

TAX POLICY

VERSION: 1

DATE OF APPROVAL: 2023-09-14

APPROVER: BOARD OF DIRECTORS

POLICY OWNER: GENERAL COUNSEL

1. BACKGROUND AND PURPOSE

Vestum AB (publ), reg. no 556578-2496 (“**Vestum**”), has developed governing documents, including this policy, and processes to ensure that Vestum is complying with applicable laws and regulations and that Vestum’s values and desired ways of conducting business are communicated and followed throughout the entire organization.

The object of this policy is to secure compliance with tax regulations.

2. AUDIENCE

This policy applies to Vestum, and all legal entities controlled by Vestum (“**Vestum Group**”). Accordingly, the policy applies to all employees and temporary staff within Vestum Group and it is everyone’s responsibility to adhere to, and act according to, the principles set out in the policy.

3. VESTUM’S COMMITMENT TO COMPLY WITH TAX REGULATIONS

Vestum Group is committed to fully comply with tax regulations. Accordingly, employees within Vestum Group are required to adhere to applicable tax regulations in all jurisdictions in which Vestum Group operates.

4. VESTUM’S OVERALL APPROACH TO TAX

Vestum Group believes that a fair and transparent tax system constitutes a vital element of a well-functioning society. Tax revenues are critical for governments to fulfil their objectives. In Vestum Group’s dealings the long-term interests of its stakeholders; the society, shareholders, customers and employees, shall be considered and balanced.

Vestum Group shall pay the correct amount of tax, in due time, with due consideration and in a transparent manner. Vestum Group shall encourage customers, suppliers and other business partners to adhere to the principles set out in this policy.

Vestum Group shall handle transfer pricing matters in accordance with the arm’s length principle and applicable domestic tax legislation.

Vestum Group shall be transparent about key financial information such as revenues, assets, FTE’s and reported tax in the jurisdictions where Vestum Group operates.

Vestum Group shall maintain a strong and long-lasting relationship with the tax authorities in the countries where Vestum Group operates, built on transparency and trust.

5. TAX PLANNING

Vestum Group shall apply a conservative attitude with respect to tax planning measures.

Vestum Group shall not engage in artificial arrangements or other forms of aggressive tax planning with the sole or main purpose of reducing tax liabilities. An arrangement shall be assessed on its own merits and not be accepted just because it is market practice or believed to be legal.

In certain cases, there might be alternative interpretations of tax or case law. In those situations, Vestum Group shall use internal and/or external expertise to secure an appropriate tax interpretation, taking Vestum Group's general attitude to tax into account. When relevant Vestum Group shall engage in dialogue with the tax authorities.