

GROUP TAX POLICY

Purpose

The objective of this policy is to set out SD Guthrie Berhad (“SD Guthrie”) tax policy and approach in conducting its tax affairs and management of tax risks.

Key Principles

SD Guthrie is committed to conducting its tax affairs in all countries in which it operates based on the following principles :

- Ensure all transactions are business / commercially driven and appropriate evaluation on tax impact and tax risk are undertaken.
- Ensure compliance with relevant tax laws, rules and regulations including timely filing of tax returns, other tax reporting obligations and paying taxes within the stipulated timelines.
- Maintain constructive professional relationships with the relevant tax authorities, government bodies and stakeholders.
- Ensure all tax matters are managed in an efficient and responsible manner, protect shareholder interests, and contribute to the country by paying fair amount of taxes.

Tax Management

The Group Finance-Tax Department (“Group Tax”) is responsible for overseeing all tax related activities of SD Guthrie and this is under the purview of the Chief Financial Officer. Group Tax will provide advice and guidance to ensure compliance with relevant tax laws, rules and regulations and engage external consultants, when necessary.

To ensure potential tax risks and tax opportunities are considered, all business units and finance departments are required to engage and seek advice from Group Tax for all transactions including but not limited to:

- Merger and acquisition
- Investment and divestment
- Distribution of profit / repatriation of income
- Changes in corporate and shareholding structure
- Changes in business models
- Cross-border business arrangements and payments
- Financing arrangements
- Intra-group and related party transactions

Tax Compliance

SD Guthrie must follow all filing and reporting obligations as required by the relevant tax law, rules and regulations including timely filing of returns and payments of taxes; in all the countries it operates in.

Intra-group and related party transactions must be conducted at arm’s length principles and follow transfer pricing requirements.

Tax Efficiency Management

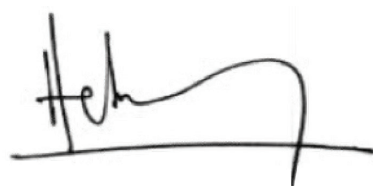
SD Guthrie ensures that any tax efficiency management opportunities are carried out in accordance with the relevant tax laws.

In support of business / commercial activities and optimizing shareholders returns, SD Guthrie will utilize tax incentives provided that it is aligned with the intended objectives of the authorities that introduces the incentives.

Tax Authorities

SD Guthrie seeks to build and maintain constructive professional relationships with the relevant tax authorities and government bodies (collectively known as “the authorities”) by :

- Being transparent, cooperative, and professional in any dealings with the authorities
- Complying with reporting obligations and payment responsibilities



Datuk Mohamad Helmy Othman Basha

Group Managing Director

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