

## Yihai Kerry Arawana Holdings Co., Ltd

### Tax Policy

Yihai Kerry Arawana Holdings Co., Ltd. (hereinafter referred to as the “Company”) commits to engaging in group tax policy in accordance with relevant national laws, regulations and rules. This tax policy sets the direction on how Company shall conduct its tax affairs and manage its tax risks.

#### 1. Scope of Application

This Policy is a disclosure statement applicable to all employees of the Company and its subsidiaries.

#### 2. Key Principles

Company’s Tax Policy is established based on the following key principles:

1. Company is committed to fulfill all statutory tax compliance and disclosure obligations in accordance with all relevant tax laws and regulations;
2. Company shall pay the right and proper amount of taxes;
3. Company shall manage its tax affairs in an efficient manner that seeks to maximize shareholder value, and at the same time, ensure all tax planning is built on sound commercial business activities and in compliance with all relevant laws and regulations; and
4. Company will not adopt any tax planning and structures that are aggressive, meant for tax avoidance or not in compliance with laws and regulations.

#### 3. Statutory Tax Compliance

Company Tax Department oversees and monitors the tax risks of the Company and its subsidiaries.

Company Tax Department regularly reports the Board of Directors, or relevant management, on tax requirements, laws and regulations to ensure proper risk management is implemented.

Company Tax Department has a team of experienced tax personnel and are supported by the tax and finance teams in the respective jurisdictions. Company has a reliable accounting system and continue to develop technology tools to manage and monitor its tax compliance.

Company and its subsidiaries must comply with all statutory compliance according to the

relevant tax laws and regulations in which they operate.

Company must ensure that:

- All tax returns are completed accurately and submitted on time;
- All information on the tax return is accurate;
- All taxes are paid by their due dates;
- Inter-company transactions are conducted at stand-alone basis and supportable by relevant transfer pricing documentations and analysis.

For specific requirements, please refer to the Company's management system, "Tax Information Management System".

#### **4. Business Transactions**

Commercial needs of the Company are paramount, and all tax advices will be undertaken in this context.

To effectively and pro-actively manage the tax risks, Company Tax Department should be engaged from the planning and throughout the implementation processes of any major commercial transactions, including but not limited to the following:

- All merger and acquisitions
- Changes in corporate/ shareholding structures
- Cross-border intercompany trading, service and/ or financing transactions
- All significant changes in business and financing transactions

Under no circumstances will Company adopt aggressive tax planning such as use of “tax haven” for tax avoidance. Any structures or positions adopted must comply with law and regulations, supportable by commercial rationale and, aligned with the economic substance and commercial activity.

#### **5. Tax Resources**

While Company has a team of qualified tax personnel, Company believes that proper use of external tax advisor will have a positive impact on the Company in managing tax risks.

External tax advice will be sought under the following circumstances:

1. When the tax law is unclear or subject to interpretation prior to reaching and/or to support major decisions as appropriate;

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2. When the potential tax exposure is material;
  3. When the Company does not have any prior experience in dealing with such tax issues (for example, tax relating to new jurisdictions)

#### **6. Tax Transparency**

Company is committed to establish and maintain constructive working relationship with all tax authorities.

We will always provide timely and accurate responses to any reasonable and legitimate requests from any tax authorities.

We are committed to engage open dialogues with tax authorities to discuss any tax matters or tax policies.

#### **7. Comments/Questions**

Any comments or questions regarding the Tax Policy shall be directed to Company Tax Department.

#### **8. Policy Revision**

The Company regularly revise and renew this policy in accordance with laws and regulations, its own business development, common industry practices and good standards.

Yihai Kerry Arawana Holdings Co., Ltd.

June, 20, 2023