



## **Tax policy**

This policy was adopted by the Board of Directors of Castellum AB (publ) on 15 June 2023.



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## 1 Background

Castellum's sustainability efforts are a natural, integrated part of its operations, and over time the company aims to become the most sustainable property company in Europe. This requires Castellum to conduct its operations responsibly in relation to both society and our stakeholders. For several years, Castellum has had a Code of Conduct based on our values and the principles of the UN Global Compact. In the Code, Castellum clarifies its positions on issues such as business ethics and information – which is highly relevant to the company's views taxes. Compliance with laws and ordinances is self-evident, and good business ethics should also characterise this field.

## 2 Document owner

Castellum's tax policy will be revised on a regular basis and adopted by the Board at least once each year. Castellum's Chief Financial Officer is the document owner and responsible for the policy.

## 3 Scope

In managing its taxes, Castellum will comply with the company's tax policy which, briefly put, means that Castellum must endeavour to pay the correct taxes in every country where it conducts operations. Castellum continually monitors changes to laws and legal praxis so that taxes are managed in accordance with applicable laws and regulations.

Tax management will be evaluated as an integral part of the company's business decisions and general risk management. This evaluation will also take risks to brand and reputation into consideration.

Castellum will acquire operations not in order to gain tax advantages, but because they are a fit with its business model. In the event of an acquisition, the laws and regulations in force will be complied with.

The company will operate ethically, legally and in a businesslike manner in view of its tax expenses and will not operate in grey zones or engage in aggressive tax avoidance. "Aggressive tax avoidance" pertains to transactions that could risk Castellum's reputation and standing as a responsible societal stakeholder.

Castellum's contact with the tax authorities in the respective countries will be marked by openness and transparency. The company will openly describe the principles that govern its tax governance and the tax that is to be paid to its stakeholders. In cases where regulations are unclear or ambiguous, the spirit of the law will be interpreted and Castellum will be proactive and transparent through open requests, applications for preliminary decisions or alternately in dialogue with the tax authority.

## 4 Breaches of policy

Any breach of this policy is to be reported to Castellum's compliance function, also serving as the Group's Chief Legal Officer, who will in turn inform the CEO.