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## **Tax policy**

The purpose of Hartmann's tax policy is to lay down the overall framework and guidelines for Hartmann's application of current direct and indirect tax rules and to ensure openness and transparency in this respect.

### **Background and policy**

The Hartmann group has operational companies in 18 countries. These companies are subject to both national and international direct and indirect tax law.

Hartmann aims for its tax business model and group structure to be as simple and transparent as possible. The group's tax business model and practices must at all times reflect and support its business strategy.

Hartmann fully acknowledges that payments of direct and indirect tax constitute a significant contribution to the societies in which the group operates. Therefore, Hartmann also acknowledges that the group's stakeholders are increasingly concerned about tax issues. Communications about Hartmann's decisions in relation to direct and indirect taxes make up a significant part of the group's communications with investors and other stakeholders.

### **Hartmann's tax policy**

Hartmann plans its tax payments so that rules, practices and the assumed intention of legislation are complied with in all relevant tax areas.

Hartmann furthermore plans its tax policy so that the group – in accordance with the legislature's intention – pays tax where values are created and at the same time avoids double taxation and ensures fair competition.

This balancing of interests is intended to ensure that Hartmann is considered a responsible taxpayer without the group's competitiveness being weakened.

### **Tax evasion and aggressive tax planning**

Hartmann does not support or participate in activities or transactions that may be perceived as aggressive tax planning. All tax transactions are based on business considerations with no aggressive tax planning in view.

Furthermore, Hartmann does not participate in any kind of activities or transactions that, to the best of Hartmann's knowledge, objectively involve tax evasion or attempted tax evasion.

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**Tax incentives**

In areas where this is justified by commercial considerations, Hartmann makes use of tax incentives where such incentives are available. Any tax incentives used by Hartmann have been introduced by the respective countries, states, etc. with a view to supporting environment-improving measures, job creation, infrastructure improvements and the development of the local communities in which the group is represented.

**Laws and standards**

Hartmann strives to comply with all national and international direct and indirect tax rules in force at any given time as well as with the OECD's tax and transfer pricing guidelines, including documentation requirements.

**Responsibility and openness**

Hartmann pursues an open and transparent approach to dealing with the tax authorities and replies to inquiries in a timely and open manner. The group uses official channels and procedures in all communications with tax authorities, other public authorities and third parties.

External consultants with the required expertise are used where relevant. In case of doubt, binding advance rulings are obtained from the authorities if possible.

In the event of disagreement about the interpretation of facts or legislation, Hartmann seeks to collaborate with the respective authorities on identifying the matters in dispute and reaching possible solutions to disagreements or misunderstandings.

**Roles and responsibilities**

The overall responsibility for Hartmann's tax policy lies with the company's board of directors, which considers and approves the policy on an annual basis. Reviewed annually by the audit committee, the tax policy applies to all companies in the Hartmann group in which Hartmann has a controlling interest, regardless of domicile.

The responsibility for implementing and complying with the tax policy lies with the CFO, supported by the group finance function.

The day-to-day responsibility for complying with relevant local tax law lies with the local management teams, supported by external consultants.