

# Tax Policy

NNIT GROUP

Classification: PUBLIC  
Version: 1

CVR no. 21 09 31 06

# Table of Contents

<b>1</b>	<b>INTRODUCTION</b> .....	<b>3</b>
<b>2</b>	<b>POLICY</b> .....	<b>3</b>
2.1	LOCATIONS .....	3
2.2	COMPLIANCE.....	3
2.3	INDIRECT TAXES .....	4
2.4	PAYROLL TAXES .....	4
<b>3</b>	<b>ROLES AND RESPONSIBILITY</b> .....	<b>4</b>

# 1 Introduction

NNIT operate and has companies in 13 countries, all of which are governed by national and international tax legislation. This document outlines NNIT's Groups Global Tax Policy and describes governing principles for tax management.

The tax policy covers corporate income tax, payroll taxes, and indirect taxes. The policy includes the obligation to mitigate tax risk to the extent possible and ensure compliance with local income tax legislation, safeguarding proper and adequate transfer pricing as well as the underlying assumptions for calculating the taxable income for the locations where NNIT operates.

Wherever possible, we seek to develop cooperative relationships with tax authorities, based on mutual respect, transparency, and trust.

## 2 Policy

The overall aim is to be tax compliant and live up to our corporate social responsibility. NNIT Group is to comply with tax legislation and to meet legal requirements, including timely filing of tax returns and tax payments. At the same time, NNIT has an obligation to ensure return for our shareholders by managing tax to secure a competitive tax rate in accordance with tax legislation.

### 2.1 Locations

NNIT is headquartered in Soeborg, Denmark and have companies in 12 other countries as well. NNIT pays income taxes on profits in the locations where value is created within the normal course of business activity. NNIT's approach to tax planning is to support the local and global business activities by ensuring that NNIT is not subject to double taxation while following both national and international tax legislation.

Transactions between NNIT entities are conducted based on arm's length principle and in accordance with current OECD guidelines.

### 2.2 Compliance

Our ambition is to apply best practices and act in accordance with applicable legislation on tax computation and tax reporting, to ensure that we pay the right amount of tax at the right time in the locations where we operate. NNIT strives to be compliant with local and global tax requirements.

Complying with tax regulation can be complex as the interpretation of legislation and case law may not always be clear-cut and may change over time. Where the law is unclear or subject to

interpretation, we will seek the advice of tax advisers. We strive to mitigate and manage any arising tax risk.

We do not set up artificial structures in tax havens to avoid taxes on activities or engage in tax planning which moves revenue from high-to low-tax countries to minimize tax payments.

## 2.3 Indirect taxes

NNIT will at all times strive to comply with local indirect tax legislation (VAT, sales taxes, withholding taxes etc.).

## 2.4 Payroll taxes

NNIT will ensure that employee withholding taxes are paid directly to local tax authorities as part of the salary payments made in the jurisdictions where NNIT is operating. It is not the responsibility of NNIT to monitor or control potential employee tax affairs. NNIT will merely subtract the income taxes payable based on the tax information provided by the employees and/or local revenue authorities.

# 3 Roles and responsibility

The Board of Directors has the overall responsibility for this Policy and the framework for compliance with tax legislation.

The Executive Management is responsible for preparation of sufficient documentation of tax decisions taken and to make recommendations to the Board of Directors about the Policy and compliance herewith.

It is the responsibility of the Executive Management to ensure that the provision for tax costs is made with due consideration of the overall tax guidelines into mind.

Additionally, it is the responsibility of the Executive Management to monitor tax risks on an ongoing basis and take appropriate action in accordance with this Policy.

NNIT Groups' Global Tax Policy is reviewed on an annual basis by the Board of Directors. Furthermore, operational tax matters, including how tax risks are monitored and managed, is reported to the Audit Committee on a periodic basis.

This policy has been adopted by the Board of Directors of the Company on December 6, 2021.