



Elmos Semiconductor SE ESG Policies

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| Section: | Governance |
| Chapter: | Compliance |
| Policy: | Tax compliance management system (Tax CMS) |
| Coverage: | Elmos Group |
| Supported UN SDGs: |     |

Addressed GRI Standards: 2-27, 207

Overview: Elmos has a compliance management system (CMS) in place to ensure compliance with applicable laws and regulations as well as all internal rules and guidelines. Elmos also has a tax compliance management system (tax CMS) in place as a separate segment of the CMS. The purpose of the tax CMS is to meet tax obligations in full and on time. The following four areas should be mentioned in relation to tax obligations, in line with the guidance provided by the Organisation for Economic Co-operation and Development (OECD):

- Tax registration
- Timely filing of tax returns
- Complete and correct information, including compliance with obligations to keep and retain records
- Timely payment of any tax liabilities

Scope: Tax compliance requires the strategic organizational application of country-specific tax laws. The process requires identifying circumstances in whose case the tax laws bring tax consequences. At the same time, tax-related obligations of documentation, record keeping, and reporting must be met.

The following types of tax are part of the tax compliance management system in place at the Elmos Group:

- Income tax (corporation tax and trade tax)
- Value-added tax
- Wage tax (including non-cash benefits)
- Property transfer tax

The primary goal of the tax CMS within the Elmos Group is to avert risks of material tax-related violations, or detect them early on, with reasonable certainty.

Responsibilities: The tax compliance officers for the individual types of taxes report at least once annually to the tax compliance officer for the Elmos Group, who in turn reports quarterly to the Chief Compliance Officer, who bears the ultimate responsibility for compliance reporting at Elmos. In organizational terms, the tax compliance function is associated with the finance department. Employees who work on tax-related matters receive specific internal and external training and are kept up to date on new tax legislation through activities such as external seminars. Fundamental responsibility for the tax CMS and the content of the tax CMS specifications rests with the statutory representatives of Elmos Semiconductor SE, and specifically the member of the Management Board responsible for finance.

External review of appropriateness and effectiveness: Elmos Semiconductor SE engaged an independent external auditing firm to review the appropriateness, implementation, and effectiveness of the tax compliance management system. This assessment found that during the period under review, the principles

and measures set out in the tax CMS specifications, in accordance with the CMS principles applied, were suitable to identify risks of material violations of tax laws and regulations early on and avert these compliance violations, in both cases with reasonable certainty.

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| ESG policies | Compliance management system (CMS) Employee training Whistleblower system |
| ESG KPIs | Average hours of training |
| Accompanying documents | Code of Conduct for Employees Code of Conduct for Suppliers and Business Partners Anti-Corruption Guideline |
