



## TAX POLICY

### **Responsibility**

ALFA Development aims to operate within the framework of best practice and good conduct, as well as the spirit and letter of the law. In this policy, the term "tax" refers broadly to both direct and indirect taxes and levies, including corporate income tax, VAT, land tax, and others.

ALFA Development is committed to a responsible and transparent tax practice, where all tax-related decisions can be clearly explained and remain within the boundaries of applicable legislation.

### **Tax Compliance**

- ALFA Developments intent is to pay the correct amount of tax as and when the obligation arises. Business decisions are driven by sound commercial rationale, and tax payment is a consequence, not the goal.
- This tax policy is designed to avoid double taxation.
- ALFA Development has no activities in, nor intends to operate in, countries listed on the EU's blacklist of non-cooperative jurisdictions.
- Intra-group and cross-border transactions are priced according to the arm's length principle, as defined by the OECD Transfer Pricing Guidelines.
- ALFA Development rejects tax evasion.
- The company maintains an open dialogue with tax authorities and ensures that sufficient expertise is applied in cases where transaction complexity demands it.

### **Risk Management**

Risk management related to both direct and indirect taxes is the responsibility of the board and company management. This includes managing tax risks in relation to major transactions and during tax planning.

ALFA Development continuously reviews its processes to ensure compliance with both national and international regulations.

### **Expectations for Business Partners**

ALFA Development expects its partners not to engage in aggressive tax planning that is inconsistent with this tax policy. If it becomes known that a partner undertakes tax practices that violate this policy, the partnership will be reconsidered.

### **Follow-Up and Reporting**

If any tax activities are identified that do not comply with this policy, employees should report to their immediate manager. Alternatively, reports can be submitted through ALFA's grievance mechanism. Inquiries can be submitted via the following [form](#)



This policy has been developed internally within the organisation with external support and has been approved by executive management. The policy is reviewed annually and revised as necessary.

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