

Tax Policy ("Policy")

Osotspa Public Company Limited and subsidiaries

(approved by the meeting of the Board of Directors No. 8/2021 held on 11 August 2021 This Policy shall be effective from 12 August 2021 onwards



หน่วย/งาน (Unit /Division) :	Finance and Accounting
แก้ไขครั้งที่ (Revision No.) :	<u>-</u>
วันที่เริ่มใช้ (Effective Date) :	12 AUGUST 2021
Personal Data Protection Policy	

เรื่อง (Subject) :

Personal Data Protection Policy

OSP Group Tax Policy is established and adopted by the Board of Directors based on our Corporate Governance principles and Code of Conduct, which requires our business be transacted in accordance with a high standard of business ethics.

OSP Group Tax Policy comprises of 3 key areas as follows:

- 1. Tax Governance
- 2. Tax Risk Management
- 3. Tax Transparency

Tax Governance

OSP Group is committed to being a co-operative and compliant taxpayer in countries we operate. The Group aims not only to fully comply with Thailand Revenue Code and foreign tax laws applicable to our foreign operations, but also the spirit of those laws.

We operate our intercompany transactions via transfer pricing based on Arm's Length Principle, in compliance with tax regulations, with an aim to pay appropriate amount of tax according to where value is created within the normal course of business.

We pursue tax planning that is consistent with business operations with sound commercial substance. We do not misuse the tax structure in the way of tax avoidance, nor engage in artificial, fraudulent, or abnormal arrangement to shift profits to tax heavens.

We are responsible to our shareholders to be financially efficient and deliver a sustainable taxation that enhances shareholder value. We look for legally available tax incentives applicable to our businesses, e.g. tax holidays, tax incentives granted for investments, and making full use of our deferred tax assets.

Tax Risk Management

OSP Group's tax risk is observed and managed through the company compliance system. Items with exposure are timely identified and risk-assessed for mitigation actions. The progress of actions is monitored and reported to Risk Management Committee.

We dedicate our resources to understand tax obligations and assure full compliances. In key tax matters, we apply for advance ruling from tax authorities and/or seek advice from reliable advisors to mitigate uncertainty. We monitor the government's policies or initiatives that would lead to law enactment, from drafting to promulgation of the tax law, and are aware of potential impact to our businesses.

Tax Transparency

OSP Group discloses its Tax Policy to the stakeholders and public via its website. Tax information disclosure is made in accordance with regulatory requirements. Our Business transactions are accurately recorded in accordance with applicable GAAPs and financial reporting standards. Tax Returns are filed timely with related taxes paid to Tax Authorities as required. OSP Group cooperates with tax authorities, including providing information in response to the tax authorities' requests.

-Signature-

(Mr. Surin Osathanugrah)

Chairman of the Board of Directors