Berli Jucker Public Company Limited บริษัท เบอร์ลี่ ยุคเกอร์ จำกัด (มหาชน)	
Tax Policy	Reference number : SRMD 02 / 2020
	Review date : 24 March 2021
	Approval date : 24 March 2021
	(Executive Board Meeting No.2/2021)
	Effective date : 24 March 2021
	Supersede date : 19 June 2020

Berli Jucker Public Company Limited and the group companies (hereinafter referred to as BJC Group) recognizes great importance on tax management based on the principle of accuracy, transparency, and accountability. That includes tax strategy and tax practice to be compliance with the BJC group's strategy and ethics in order to bring about sustainable growth.

## Policy Scope

This policy applies to the business operations of Berli Jucker Public Company Limited and its subsidiaries.

## Guidelines

- 1. BJC Group's taxation complies with the applicable laws and regulations in which the company operates.
- 2. BJC Group has tax planning and operation department that must frequently follow up new relevant tax policies, laws or regulations, including scrutinizing the principles, guidelines, and business's impact in order to form a proper tax strategy.
- 3. BJC Group's approach to transfer pricing for the purpose of trading goods and services properly conducts in accordance with the market price and updated Revenue Code: Transfer Pricing especially about the prevention of transfer pricing between relating company and partnership.
- 4. BJC Group will arrange tax strategy under the reason of commerce, and does not have tax avoidance policy.
- 5. BJC Group will establish its subsidiaries in Preferential Tax Regimes countries, Low Tax Jurisdictions countries, or Tax Haven Countries for legal business purpose, including complying with tax laws and regulations in which the Company Group operate and/or invest as well.
- 6. BJC Group may consider making use of tax incentives, and obtain tax exemption and tax allowance privileges at certain times according to country's tax laws and policies. All privileges may affect a business's decision, but will be considered as a part of economic factors.

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- 7. BJC Group has responsibility for stakeholders' profits due to its great financial credibility and its tax structure which sustainably provides added value to its stakeholders.
- 8. Tax policy must be considered and approved by the Board of Directors or the Committee delegated by the Board of Directors.

The Tax Policy will be effective from 24 March 2021 onwards.