Tax Policy

Background and premise

cBrain has, as part of the CSR work, developed a number of policies. The policy "Anti-corruption" states, among other things, that "We do not perform aggressive tax calculations or use transfer pricing to avoid paying tax".

Through this tax policy, cBrain wants to deepen and unfold the company's position on tax matters. This is done by applying a value-based approach, where principles and ethical norms are expressed for how the company should behave. It is a fully conscious choice as it matches the company's values, culture and approach. The policy is a policy and guideline that should guide the company in its decisions.

Purpose

The Tax policy establishes principles and guidelines for the company's actions in relation to tax issues.

Principle

We follow current tax rules in the countries cBrain is taxable to. There is no aggressive tax policy. cBrain follows an ethical attitude of being the good citizen.

Transfer pricing is used to tax income in the countries where the business is conducted, so that earnings are allocated to the right country according to current and recognized principles.

Starting point and approach

The starting point for the company's conduct in the field of taxation is:

- cBrain wants to act and behave as a good citizen of society
- cBrain follows both the letter and the intention of the law
- cBrain does not speculate for the purpose of reducing taxes
- cBrain decides on fiscal purposes based on usual business considerations and in close and natural context with these.

Based on the above, cBrain optimizes long-term owners' interests.

The approach when deciding on tax matters is based on:

- Principles that can be explained and defended
- A technical/business approach to tax issues
- Clarity on the background of decisions
- A behavior in which caution is exercised
- Applying ordinary practice, with consideration to objective and common interpretation of the respective laws and practices

- When reviewed we have a strong gut feeling.

Behavior in relation to tax authorities

The company wants to have an open, proactive and trustworthy relationship with the tax authorities.

The company must act timely, accurate and provide the necessary information in relation to the tax authorities.

Practice

Specifically, it is implemented in everyday life through 4 principles:

Principle # 1: Good Citizenship
The basic principle is that we want to act as good citizens and therefore pay the tax that can be expected of a good citizen.

Principle # 2: Feel (Ask yourself)
All of our business operations are based on the “good citizen” principle. Therefore, when we plan transactions that can have a tax effect, we ask ourselves whether, with the specific disposition, do we behave expectantly, and and do we ensure transparency by documenting and revising unusual dispositions. This is executed through the following 4 steps:

- Step 1: Do we have business in that respective country?
  If we make business transactions that have a tax effect in a country without including the provision of solution or services in that country, it is considered unusual.

- Step 2: Do we use abnormal practices?
  If we make business transactions that have a tax effect different from similar transactions, it is considered unusual.

- Step 3: Are there new practices?
  If we make new business transactions which have a tax effect, this is considered unusual.

- Step 4: Assessment and documentation
  All unusual dispositions are presented to and approved by management. The approved decisions are documented and audited by the company's audit committee.

Principle # 3: Reasonable Behavior
Management is responsible for taking care of the corporate interests and at the same time balancing the interests of the company and its owners in relation to the interests of society. The company must therefore act holistic but business wise. In relation to tax, the company defines three types of action:

- Type 1: Smart
  The company makes transactions that are only carried out for tax reasons. For example, invoicing via international construction which reduces tax payment.

- Type 2: Sensible
  The company acts as expected by similar companies with similar types of activities.

- Type 3: Naive
  The company undertakes transactions that causes larger tax payment than that paid by similar companies with similar types of activities.

Types 1 and 3 are in principle not compatible with the "Good citizen" principle.

Principle # 4: International balance (“International balance”)
Internationally, the company seeks to act and dispose in the same way, across all countries and thus without regard to any tax advantages and disadvantages that may exist in individual countries.

Anchoring

The tax policy is rooted in the Board of Directors and is revised every two years.

The Audit Committee ensures that tax policy is complied with.

The daily responsibility for compliance with tax policy is placed with the CFO.

Reporting

The company continuously reports through the Annual Report - on:

- Structural/organizational conditions and indication of background for presence in individual countries
- Tax returns in the countries where the company is present
- Current and paid tax calculated country by country
- Total corporate tax contribution and effective tax rate
- Any ongoing disputes with authorities/tax cases pending before the courts
- Investigations, inquiries, etc. from the tax authorities on significant matters.

Reporting aims to provide as much openness as possible about applied taxation principles, about the structure of the company and about assessed and paid taxes. Where uncertainty exits about the content of relevant provisions or a risk of disagreement with the tax authorities arises, contact is made at an early stage.

Log

Version	Date	Author	Description
1.0	2019.08.21	EJJ	Tax policy created, approved by board of directors
1.1	2021.11.03	EJJ	Revised. Approved by the board