

Tax Policy

Version 1.0
2024/05/07

1. Introduction

Colruyt Group wants to make a positive difference in everything it does. Our group mission and our values are the crucial guidelines in this. Every day we work on a common goal: Together, we create sustainable added value through value-driven craftsmanship in retail. As a retailer and people-oriented organisation, we want to take responsibility and, from our special place in the value chain, be a lever for sustainable positive change.

The same goes for our commitment to tax compliance. At Colruyt Group, we are committed to conducting our business operations ethically, and in compliance with all applicable laws and regulations. Our tax policy aligns with our values of sustainable entrepreneurship and contributing positively to the communities in which we operate. In our annual report, we provide information on the contributions paid in terms of the different taxes applicable to us, such as withholding tax on wages, income tax on profits, value added taxes, product-related taxes (customs, excise), property withholding taxes, registration duties, provincial and municipal taxes and other federal taxes.

This policy applies to Colruyt Group. Colruyt Group is understood to mean Colruyt Group NV, whose registered address is established in 1500 Halle, Edingensesteenweg 196, VAT BE0400.378.485, and all legal entities affiliated with Colruyt Group NV within the meaning of article 1:20 of the Belgian Code of Companies and Associations.

2. Compliance with laws and regulations

At Colruyt Group, we are aware of the importance of responsibly managing our tax affairs. Colruyt Group is dedicated to complying with all applicable international and local tax laws and regulations in each jurisdiction in which we operate. This includes accurate and timely reporting, payment of taxes, and compliance with filing requirements in each country of operation. Regular reviews of our procedures are conducted to align with changes in tax laws and regulations to ensure ongoing compliance. As part of our commitment to tax compliance, we attend to continuous training and development for our tax professionals.

3. Tax planning and strategy

Colruyt Group's tax planning is guided by a commitment to legal compliance and ethical conduct. Our approach to tax management is focused on supporting the business objectives and commercial activities of our group. We do not engage in practices that rely on the use of tax havens for tax avoidance purposes nor practices that consist in a transfer of value to low tax jurisdictions where such would not be aligned with

genuine commercial considerations, operational business activities and substance. Through tax planning, we aim to mitigate tax risks, facilitate, and improve operational efficiencies, and deliver lasting value to all our stakeholders (i.a. shareholders, customers, suppliers, co-workers, the public), while upholding our high standards of integrity and corporate responsibility.

4. Tax governance and risk management

Tax risk management is key in an ever-evolving global tax landscape. To manage these risks effectively, we conduct regular assessments and quality assurance reviews with the aim to identify, assess, and address potential tax risks before they become significant issues, demonstrating our commitment to prudent and responsible tax management.

5. Reporting and transparency

We are committed to transparency regarding our tax governance and tax affairs. Our stakeholders, including investors, customers, suppliers, regulators, and the public, can rely on accurate and comprehensive disclosures in our financial reports and other relevant communications, regarding our global activities, profits, our effective tax rate and taxes and contributions paid to the tax authorities.

Colruyt Group is committed to complying with i.a. country-by-country reporting requirements. The country-by-country reporting provides transparency on revenues, profits and taxes paid on a country-level, and is submitted in accordance with the applicable laws and regulations.

6. Transfer pricing

Colruyt Group is committed to maintaining arm's length transfer pricing for all transactions involving related parties. We recognize the importance of ensuring that such transactions reflect market conditions and are conducted on terms and conditions that would be agreed upon between unrelated entities.

7. Sustainable practices and tax incentives

As a value-driven group, we are committed to sustainable business practices. The 17 sustainable development goals, as set by the United Nations to address global challenges by 2030, act as a compass for our sustainability ambitions and strategy. In our annual reports, Colruyt Group reports about the impact we achieve based on the Sustainable Development Goals. We actively seek opportunities to invest in ESG-related initiatives. By leveraging financial and tax incentives, credits, and initiatives available that encourage and reward

sustainable practices, innovation, and investments, we aim to not only reduce our environmental impact, but also to contribute positively to society and to drive meaningful change in our industry, with respect for people, the planet, prosperity, peace, and partnership.

8. Collaboration with tax authorities

We maintain an open and collaborative relationship with tax authorities in the countries where we operate. We engage in constructive dialogue and provide the tax authorities with all necessary information to address inquiries or audits promptly and transparently.

Colruyt Group is committed to responsible tax management and acknowledges the importance of certainty and compliance in tax matters. Colruyt Group is committed to making informed decisions based on clear and authoritative guidance from tax authorities. In case of material transactions, Colruyt Group may seek advance tax rulings from relevant tax authorities to reduce uncertainty, ensure compliance with tax laws and foster transparent tax practices.

9. Collaboration with public instances and sector federations

At Colruyt Group, we recognize the evolving nature of tax legislation and the impact it has on our operations. Whether upon request or through proactive interaction, we seek to contribute to the development of fair, balanced and effective regulations by actively engaging with decision makers and sector federations and by providing valuable insights and perspectives. This commitment reflects our dedication to staying informed and advocating for a tax landscape that is transparent, equitable, and encouraging sustainable business practices.

10. Review and approval and continuous improvement

This tax policy has been duly reviewed and approved by the Board of Directors of Colruyt Group. This approval process ensures alignment with our company values and signifies a collective endorsement of our commitment to transparent, lawful and responsible tax practices.

We are committed to regularly reviewing and updating our tax policy as necessary to reflect changes in tax laws, regulations and international tax developments, and align with evolving best practices in tax management.

11. Conclusion

Colruyt Group's tax policy reflects our commitment to responsible business conduct, sustainability and compliance. We are dedicated to upholding these principles as we continue to develop and make a positive impact on society and the environment.