

Tax Policy.





Foreword

Elevion Group commits to be an ethical and sustainable partner. This means that we focus on providing sustainable practices for our clients and suppliers, as well as developing businesses that benefit society through economic and social growth. We believe that working towards implementing high procurement standards at the opportunities we invest, is the most appropriate way to reduce environmental and social risks and generate value. Elevion Group acknowledges that the business we do relates to specific climate-related risks and opportunities and considers the impact of each potential investment on climate.

Jaroslav Macek, CEO of Elevion Group B.V.

Elevion Group Introduction

Elevion Group B.V. is a leading European provider of end-to-end decarbonization and higher energy efficiency solutions. Thanks to its unique structure and its pioneering spirit, its capabilities can be easily scaled across the project scope, for various project sizes and a range of required expertise. Elevion Group operates on 12+ European markets (including The Netherlands, Germany, Austria, Italy, Poland, Romania and Hungary) through 60+ highly specialized independent companies, but with the financial strength of an international group. Elevion Group B.V., a subsidiary of ČEZ a.s., with its headquarters in Amsterdam, acts as the holding company of the Elevion Group.



Policy Summary

The purpose of this tax policy is to define the fundamental tax governance framework of the Elevion Group (hereinafter also the “Group”). This includes definition of the Group’s approach to tax compliance, but also outlining basic principles on tax professionalism, relationship with tax authorities, transfer pricing, tax risk management, as well as considerations on tax optimizations.

Statement of our Tax Policy

In tax area, the Elevion Group is fully committed to adherence to local tax standards and we perceive our contribution to societal welfare as our utmost goal. Therefore, the Elevion Group is appreciative of its duty to pay fair economic value in the form of taxes to countries in which it operates.

The Group’s tax strategies are regularly reviewed by the Board of Directors and Supervisory Board of Elevion Group B.V.

Key Tax Principles

Approach to tax compliance

The Elevion Group seeks to adhere to highest professional standards and full integrity when preparing its tax returns. All tax returns, as well as tax disclosures, are filed in line with local requirements.

We work solely with trustworthy tax advisors and promote mutual constructive dialogue about tax positions assumed. We acknowledge that some ambiguities may arise due to various interpretations of tax laws and regulations, but due care is always exerted in defining the eventual tax position assumed while considering the prevailing tax practice as well as practical approach of local tax authorities. The Group also makes appropriate tax disclosures in its Group’s financial statements in line with requirements of applicable IFRS framework.



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Tax professionalism

Group's tax matters are administered by an experienced financial team, in some cases the members having certified tax advisor status. We acknowledge tax environment becoming more and more complex and, therefore, changes in tax laws are actively promoted not only in Group's financial organization, but also in its business operations.

We are fully committed to promote tax awareness and professionalism and, therefore, the members of both the global and local financial teams shall have sound expertise in tax matters, whilst continuous tax training programs have been implemented in this respect. We also actively work with the tax team of our ultimately shareholder, ČEZ, a.s., to ensure tax consistency within the CEZ group and we abide by the tax policies it defines.

Approach to tax authorities

The Group seeks to maintain open, fair and respectful dialogue with local tax authorities. We pursue the imperative of full tax transparency and never assume aggressive tax positions which solely rest on the presumption of being not identified by tax authorities.

Transfer pricing

The Group is well aware of dynamic transfer pricing environment in which it operates and all OECD transfer pricing initiatives are monitored closely by the Group. The Group is committed to prepare transfer pricing documentation for each material intragroup transaction or as required by local law and/or deemed appropriate. The Group has also set out global transfer pricing policies for intragroup transactions, which are constantly updated based on developments in tax environment. The Group always aims at abiding by the arm's length principle when setting its transfer prices.



Tax risk management

The Elevion Group perceives tax risks with utmost care potentially having both financial and reputational impact and, therefore, tax risk management constitutes integral part of global enterprise risk management. The Group has appropriate mechanisms at its disposal that safeguard early identification, assessment, measurement and monitoring of relevant tax risks. The respective tax control mechanism has been implemented and defined in cooperation with the CEZ Group.

Tax optimization

The Group recognizes its responsibility to contribute equitable tax amounts to local jurisdictions and aims at full compliance with local tax frameworks. On the other hand, it has also fiduciary duty to protect the shareholder value and maintain reasonable amount of tax costs. Business considerations though always prevail and tax optimisations shall be aligned with the commercial substance of the underlying business, whilst the Group is never engaged in artificial tax arrangements.

Date:

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