

Tax Governance Policy

1. Scope

- 1.1 Hysan is committed to fully complying with its statutory tax obligations in which it operates, including the payment and reporting of taxes.
- 1.2 The overall governance and responsibility for the Group's tax affairs rests with the Board and the Chief Financial Officer of the Company.
- 1.3 Day-to-day responsibilities for the Group's tax affairs are handled by the Finance Department, which is led by the Chief Financial Officer. The Chief Financial Officer has responsibility for ensuring compliance with the Group's tax policies.
- 1.4 The Group's tax matters are overseen by the Audit and Risk Management Committee of the Company.
- 1.5 The Group has developed a Tax Governance Framework to provide guidance on how its tax affairs should be managed. The Tax Governance Framework comprises several elements including the Group's Tax Strategy, its Tax Policy, and its approach to dealing with tax authorities.

2. Tax Strategy

The Group's Tax Strategy is as follows:

- **Compliance:** To comply with tax obligations in which the Group operates and to comply with the Group's Tax Policies;
- **Risk Management:** To control and manage tax risks and the Group's reputation through appropriate policies and communications; and
- **Sustainability:** To facilitate the growth and development of the Group's business activities in a tax-efficient, ethical and responsible manner.

3. Tax Policies

The Group's tax policies are as follows:

- Tax risks arising from the Group's operations must be monitored and managed by our governance framework and material risks must be reported to the Audit and Risk Management Committee;
- Tax compliance obligations must be properly discharged;

- Robust processes and procedures must be in place to minimize tax risks and compliance errors and must be periodically reviewed to ensure that they are updated to reflect changes in latest law and practice;
- All tax positions taken must be well-considered and in compliance with applicable laws, regulations and practices, with due advice being taken from reputable professional firms or qualified external advisers as appropriate;
- When entering into commercial transactions, the Group may seek to take steps to procure advantages of tax incentives, reliefs and exemptions implemented by the relevant tax authorities and available under the applicable tax legislation;
- The tax affairs of the Group should be arranged and managed to support its commercial business activities;
- Related party transactions must be properly managed and documented to ensure they are in compliance with latest tax law and practice; and
- The Finance Department should be informed and consulted in advance on tax and business matters where appropriate, including the tax consequences of material commercial transactions and decisions made with respect to such transactions.

4. Transparency

4.1 The Group is committed to having a transparent and constructive relationship with the relevant tax authorities in the jurisdictions in which the Group has operations.

4.2 All dealings with any tax authority should be conducted in a professional and open manner.

Definitions:

“**Board**” shall mean the board of directors of the Company.

“**Company**” or “**Hysan**” shall mean Hysan Development Company Limited.

“**Group**” shall mean the Company and its subsidiaries.
