

TCI Co., Ltd.

Tax Strategy & Governance Policy Statement

Adopted by the 3rd Meeting of the Board of Directors of TCI Co., Ltd. in 2026, August 10, 2026

TCI Co., Ltd. has established a company-level risk management system and defined the responsibilities of its Risk Management Committee, and has publicly issued its Integrity Management Operating Procedures and Code of Conduct, covering the persons to whom they apply and anti-dishonest conduct.

Upholding the principles of integrity in business, responsible tax payment and a high degree of transparency, we regard tax governance as an important cornerstone of corporate governance and sustainable operations. Taxation is a vital resource supporting public infrastructure and social development. We understand that paying tax in accordance with the law in every jurisdiction in which we operate, and implementing fairness and compliance, are key to maintaining stakeholder trust, reducing the risk of disputes and securing long-term value.

Our Commitments

- Compliance with the letter and spirit of tax law: In all jurisdictions in which we operate, we comply with both the provisions and the legislative spirit of tax laws and related regulations, giving full consideration to legislative purpose, public policy intent and the principle of equitable taxation.
- Responsible taxation aligned with value creation: We bear a reasonable tax burden commensurate with our actual business activities and the locations where value is created. We do not act for tax-driven purposes, nor do we improperly shift economic value or profits actually created to low-tax jurisdictions.
- Anti-avoidance and commercial substance: We expressly oppose tax avoidance in any form and do not adopt tax structures or arrangements that lack commercial substance or economic rationale. All investment structures, organizational designs and cross-border transactions must have a legitimate commercial purpose and genuine operational and management functions.
- Transfer pricing and related-party transaction governance: We price transactions in accordance with the OECD Arm's Length Principle, maintain a transfer pricing policy and documentation system, and periodically review the reasonableness and consistency of transaction terms in accordance with local regulatory requirements.
- Position on tax havens and tax transparency: We do not engage in tax planning through tax havens or jurisdictions lacking transparency for tax avoidance purposes. Where an establishment is set up for genuine operational needs, we ensure it has adequate commercial substance, management functions and information transparency, and complies with international anti-avoidance and information exchange standards.
- Tax risk management and internal control: We incorporate tax risk into our enterprise-wide risk management framework and, through internal control systems and professional teams, continuously identify, assess and manage tax-related risks. For material, complex or high-risk matters, we consult external professional advisors as appropriate to ensure that our treatment is reasonable, compliant and consistent.
- Board oversight and continuous improvement: This policy has been reviewed and approved by the Board of Directors or a functional committee authorized by it. The Board regularly receives management reports on material tax matters, cross-border transaction arrangements, regulatory changes and tax disputes, and supervises continuous improvement and policy updates.
- Transparent disclosure and stakeholder communication: We disclose our tax governance principles and policy direction through the Company website, the sustainability report or other appropriate means, so as to enhance transparency and promote communication and trust with investors, regulators and other stakeholders.

Our Strategy

- Compliance governance and regulatory foresight: We establish group-level tax compliance management and institutionalized processes, and continuously monitor tax legislation and regulatory trends to ensure that policy, operations and filings are consistent and auditable.

- Risk identification, management and internal control: We incorporate tax risk into enterprise risk management, apply differentiated controls and escalation mechanisms according to the level of risk, and reduce the risk of disputes and losses through internal controls and routine reviews.
- Related-party transactions and transfer pricing governance: With the arm's length principle at the core, we implement transfer pricing documentation, periodic review and cross-departmental collaboration to reduce transfer pricing risk and enhance transaction transparency.
- Cross-border structures and commercial substance management: We ensure that investment structures, organizational designs and cross-border transactions have a legitimate commercial purpose and substantive functions, avoiding unnecessary structural complexity and compliance risk.
- Information disclosure and stakeholder collaboration: On the principle of openness and transparency, we clearly communicate our tax governance position and management practices, and respond to stakeholder expectations regarding responsible taxation and transparency.
- Board oversight and continuous improvement: Through Board oversight and periodic review and update mechanisms, we ensure that this policy remains consistent with and effective for our operating model, risk profile and changes in the external environment.

Scope of Application

This policy takes effect upon approval by the Board of Directors. We will review and update it periodically in light of changes in the regulatory environment, our operating model and our risk profile, and will maintain the timeliness and consistency of external disclosure in accordance with corporate governance principles.