

Tax Governance Policy (concerning SG taxation)

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Singapore Tax Governance Policy

In this document, “DKSH Group” shall refer to the companies included in the scope of consolidation used for the relevant consolidated financial statements of the DKSH Group, as published from time to time under www.dksh.com.

DKSH Group is a leading Market Expansion Services provider that operates in 36 countries. Throughout our more than 150 years of history, being a responsible corporate citizen has been the foundation of our success. At DKSH, we do business in a way that is profitable while maintaining good corporate governance and risk management. DKSH is committed to observing all applicable laws and regulations, including the tax laws of the jurisdictions where we operate.

This tax strategy covers the Singapore subsidiaries of the DKSH Group for all Singapore taxes and duties. It sets out our approach towards conducting our Singapore tax affairs and satisfies our obligations under the Income Tax Act 1947, Goods and Services Tax Act 1993 and relevant subsidiary legislations.

Approach of the Group to tax risk management and governance

Governance

Responsibility for the tax strategy, the supporting governance framework and management of tax risk ultimately lies with the Chief Financial Officer. Day-to-Day responsibility and execution for these areas sits with the Group Tax Director, who relies on the information and recommendations made by the respective Country Finance Manager of the Singapore subsidiaries of the DKSH Group.

DKSH Group’s Tax Strategy is aligned with DKSH Group’s wider risk and control framework. Key tax risks and issues at DKSH Group level are escalated to and considered by the Audit Committee of the Board of Directors of DKSH Holding Ltd.

Tax risk management

DKSH Group’s approach to tax risk follows the same principles that apply to all other business risks across the Group. Where there is substantial tax uncertainty (or complexity), DKSH Group:

- engages professional tax firms for advice and assistance; and/or
- seeks advanced tax ruling or private ruling from the tax authorities;

The Group will continue to look at resourcing and will assess headcount within the Singapore Tax and Finance function as the scale and complexity of the Singapore business evolves.

DKSH Group endeavors to comply with all tax filing, tax reporting and tax payment obligations in the jurisdictions where it operates. Our Singapore tax strategy seeks to ensure that we pay the amount of taxes legally due in Singapore.

Attitude towards tax planning

DKSH Group is committed to be a responsible taxpayer, in every jurisdiction in which it operates. Simultaneously, DKSH Group also has a responsibility to its shareholders to structure its commercial affairs in an efficient manner.

We continue to operate in a controlled framework and governance to ensure, in all material aspects, we continuously attempt to keep the tax risks low, even as we align with DKSH Group's broader commercial objectives. Our interpretation of the law reflects the commercial background and considers the spirit in which these laws are intended.

Approach towards its dealings with Inland Revenue Authority of Singapore (IRAS)

DKSH Group is cooperative and transparent in its interaction with IRAS and all relevant information is provided to the extent required by law to review the DKSH Singapore subsidiaries' tax matters. We strive to work proactively, positively and collaboratively with IRAS to achieve swift resolution to the tax matters wherever possible.

As both the business and tax environments are evolving, we will regularly review and update our Singapore tax strategy to ensure that it keeps up with the changes and enable us to effectively mitigate our risks. This includes through advance agreements and clearances where appropriate, discussion prior to return submission on a proposed interpretation of tax law where the law is unclear and / or new and in relation to any disputed issue.