



Mellenu Holding

Tax Charter

May 2026

1 Purpose and scope

This document sets out Mellenu Holding's (Mellenu or the Group) approach towards the management and control of its tax affairs and sets out the general framework within which the Group operates when considering tax related issues. The principles defined here are followed by all Group entities and its employees and are part of the Group's Tax Policy.

2 General principles of tax matters in Mellenu Holding

The taxes Mellenu pays are an important part of its wider economic and social impact and play a key role in the development of countries in which the Group operates. Mellenu regards this as a critical part of our commitment to grow in a sustainable, responsible and socially inclusive way. Therefore, proper tax management is essential for the Group, its shareholders and other stakeholders affected by its activities. Mellenu is committed to comply with all applicable tax laws, rules and regulations, irrespective of whether they are local, national or supranational. The Group fosters a culture of compliance with tax laws, even by persons who do not carry out their work closely related to tax, finance or accounting. As a basic rule of our day-to-day business, the Group's tax strategy is aligned with its business and commercial strategy. The Group believes its obligation is to pay the amount of tax legally due in any jurisdiction, whether a well-established market or a new entry for Mellenu, in accordance, in form and substance, with rules set by governments and where economic value is created. In order to optimise value for all stakeholders, Mellenu Group may seek to take steps to use reliefs and incentives available under applicable laws and double tax treaties to maintain the Group's global tax efficiency, avoiding double taxation and reducing unnecessary tax burden. All transactions must have a business purpose and commercial rationale, consistent with the Group's commitment to be a good corporate fiscal citizen.

3 Tax risk management and tax compliance

Mellenu has established policies which govern our approach to identify, manage and mitigate tax risks. These include as an example transfer pricing using the 'arm's length

principle' based on OECD transfer pricing Guidelines, in conjunction with local requirements applicable in jurisdictions where the Group operates, for transactions between Group entities or necessary analysis and reporting for DAC6 purposes. Tax risks are actively managed within an appropriate framework and control procedures. Significant risks are reported to the Executive Committee. Potential material risks are assessed for the likelihood of occurrence and the negative financial or reputational impact on the Group. Due consideration is given to the Group's reputation and its corporate and social responsibilities when considering tax issues and this forms part of the overall decision-making and risk assessment process within the Group. Mellenu does not tolerate tax evasion of any kind, including facilitation of tax evasion by any person employed or contracted to Group or acting on the Group's behalf. In situations where applicable tax laws and/or practice are unclear, the Group will engage with external tax advisers to ensure compliance and that statutory and legislative tax obligations are met. However, as tax legislation is often complex and its application may be unclear, it is impossible to ensure that our interpretation of our obligations will always be accepted by tax authorities. Therefore, Mellenu aims to ensure it is aware of all relevant tax risks, including in relation to compliance matters, financial reporting, tax management, tax audits and legislative developments by staying up-to-date in terms of qualification for its employees as well as using the relevant tools for its tax work.

4 Relationships with tax authorities

Mellenu recognises the important role of all tax authorities in the various jurisdictions in which the Group operates, acknowledging them as stakeholders in its business. It is the Group's policy to be transparent and proactive in all interactions with tax authorities. Therefore, all Mellenu companies seek to maintain constructive, collaborative and professional relationships with local tax authorities based on transparency and trust. The Group will comply with relevant legal disclosure and approval requirements, and all information will be clearly presented to the tax authorities or other relevant bodies, as appropriate.

5 Transparency

Our local operations publish detailed accounts, including their resident entities, primary activities, the number of employees and corporate income tax paid with the relevant national company registers as required by, and in compliance with, local laws. As a business that issues bonds, we share detailed accounts of our guarantors in our investor reports. A full list of our Group entities and their national residence can be found in our annual report.