
TAX POLICY

Document control

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Review and approval

Endorsed for application within Jan De Nul Group by	Date
Director: F. Buyle	20-Dec-2023
Director: N. Van Ghendt	20-Dec-2023

Reference documents

Reference	Title
JDN controlled documents	
JDN-POL-0003	Code of Conduct
JDN-POL-0006	Supplier Code of Conduct
JDN-POL-0012	Policy for the protection of whistleblowers

Definitions

Definition	Meaning
Jan De Nul Group	Jan De Nul Group means Sofidra SA and all of its affiliated companies.

Abbreviations

Abbreviation	Meaning
OECD	Organisation for Economic Co-operation and Development

1 Statement of intent – objectives

In line with our vision, mission and values, taking into account the interests of our stakeholders, this document sets out the Jan De Nul Group's ("Jan De Nul") approach to conducting its tax affairs and dealing with tax risk.

The Tax Policy adopts the principles set out in the Jan De Nul's Code of Conduct as published on the website www.jandenu.com.

Jan De Nul supervises the commitments of its local offices, be it individual branches, permanent establishments or subsidiaries, collectively called companies of Jan De Nul Group, in ensuring that it complies with the Tax Policy. The Policy aims to minimise the level of risk which, together with strong internal controls, substantially reduces the tax risk to materially acceptable levels.

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2 Scope

2.1 Implementation scope

Policy to be implemented by		Geographical boundary
Companies of Jan De Nul Group	Yes, by all companies of Jan De Nul Group	Worldwide
Supply chain of Jan De Nul Group	Yes	
Clients of Jan De Nul Group	No	

The Tax Policy is approved by the Board of Directors and applies to all taxes relevant to the global business of the Group.

2.2 Information scope

The Tax Policy may be communicated to any third party without any restrictions, for informative purposes.

3 Commitments

3.1 Risk management and governance arrangements

Jan De Nul is committed to ensuring that its tax affairs are transparent and compliant with all tax laws and regulations applicable globally and are in line with international best principles (e.g. OECD and EU guidelines and standards). This includes (but is not limited to) adherence to the arm's length standard for intra-group transactions as adopted by the Organisation for Economic Co-operation and Development (OECD) in Article 9 of the OECD Model Tax Convention.

Jan De Nul has an in-house tax team which is responsible for ensuring tax compliance across Jan De Nul. The day-to-day tax activities are undertaken by the local financial management team. Jan De Nul seeks support of external tax advisors for ensuring the Group complies, in an accurate and timely manner, with all applicable tax laws and regulations, including:

- Accurate tax compliance, i.e. filing all mandatory tax returns, reports and disclosures;
- Timely payment of all direct and indirect taxes, levies and duties;
- Keeping of the proper records and documentation to support the tax filings;
- Responsible tax risk management resulting from legitimate tax planning based on sound business reasons, including application, as appropriate, of available tax reliefs and incentives.

With reference to non-current or extraordinary transactions or operations, the tax consequences and risks are identified by the financial management team and/or Jan De Nul's in-house tax team with the support of external tax advisers.

3.2 Attitude towards tax planning

Jan De Nul's tax planning approach reflects the Tax Policy adopted at the worldwide group level and is consistent and aligned with the Code of Conduct and approach to corporate governance wherever Jan De Nul operates. Jan De Nul's tax team aims to support the commercial needs of the business to achieve their objectives.

Jan De Nul takes a conservative approach to tax planning and does not engage in tax planning arrangements where a significant risk of challenge by Tax Authorities is considered. Jan De Nul aims to ensure full disclosure and to be transparent about the filing position that it has taken.

External advisers provide appropriate input into business proposals to ensure that there is a clear understanding of the tax consequences of any decisions made.

External tax advice is also sought with respect to areas of complexity or uncertainty in relation to current tax legislation. Advice may also be sought from Tax Authorities directly for assistance in interpretation or application of tax legislation.

3.3 The Group's approach towards its dealings with Tax Authorities

Jan De Nul ensures an open, cooperative and professional approach in its relationship with Tax Authorities.

Jan De Nul is committed to:

- Making fair, accurate and timely disclosures in correspondence and returns, and responding to queries and information requests in a timely fashion;
- Seeking to resolve issues with Tax Authorities in a timely manner, and where disagreements arise, to work with Tax Authorities to resolve issues by agreement where possible;
- Being open and transparent about decision-making, governance and tax planning;
- Structuring transactions in order to give a tax result which is not inconsistent with the economic consequences (unless specific legislation anticipates that result), nor contrary to the spirit of the prevailing legislation and regulations; and
- Interpreting the relevant laws in a reasonable way and ensuring transactions are structured consistently. Where appropriate, pre transaction clearance from Tax Authorities will be sought.

4 Implementation

Implementation by Jan De Nul Group

This policy is communicated via:	JDN website. To be communicated both internally and externally.
This policy is implemented by means of:	Communication / publication
Responsibility of implementation of this policy is with:	Tax department and local financial management team
This policy is aligned with:	Jan De Nul Group (Supplier) Code of Conduct
This policy will be evaluated, reviewed and updated:	Periodically revised in line with our (Supplier) Code of Conduct in order to ensure that it reflects relevance, stakeholder input, changing circumstances, changing legislation, amended certifications, new knowledge and opportunities for Jan De Nul Group.

**Implementation by value chain**

This policy is communicated via:	JDN Website, contracts and purchasing conditions (see Code of Conduct)
This policy is implemented by means of:	Communication / publication
Responsibility of implementation of this policy is with:	Business and project management Tax department and local financial management team
This policy is aligned with:	Jan de Nul Group (Supplier) Code of Conduct
This policy is communicated to:	All counterparties of Jan De Nul Group