



## Sinch Tax Policy

### Introduction

This tax policy (the “Policy”)<sup>1</sup> applies to Sinch AB (publ) and its directly and indirectly owned subsidiaries (“Sinch” or “Sinch Group”). The Policy covers Sinch’s business activities globally and applies to everyone working for Sinch or on Sinch’s behalf, including employees, consultants and board members (“Representatives”). All Representatives are individually responsible for reading, understanding, and following the Policy.

This Policy is applicable for the financial year 2024.

### Risk management and governance

- Sinch strives to comply with all relevant tax laws and tax governance procedures.
- Sinch’s approach to tax and tax risk is monitored by Group Tax (being part of Finance & Legal) and overseen by the CFO and the Audit Committee, which includes members of the Board of Directors.
- Group Tax is managed by Global Head of Tax, who is responsible for communicating and annually updating the Policy.
- Representatives are encouraged to take an active role in escalating tax issues, if needed, for them to be dealt with appropriately.
- Sinch has implemented a process for internal controls, which seeks to identify, manage, and mitigate tax risks. Significant risks are reported to the Audit Committee. If needed, material tax matters will be raised to the Board of Directors.
- Sinch seeks to manage tax risks that are complex or uncertain by obtaining expert advice or by engaging directly with the appropriate tax authority.

### Sinch’s attitude towards tax planning

- Sinch believes taxes play a necessary and important role in society. Sinch Group has a responsibility to pay all taxes legally due. Tax decisions are made based on commercial reality and tax is one of many factors taken into consideration when making decisions.
- Sinch adopts its tax position based on solid economic business reasons and commonly accepted practices, avoiding abusive tax planning schemes. Tax decisions will be made based on commercial reality and in consistence with the spirit and intent of tax laws.
- We will not engage in aggressive tax planning schemes that lack commercial substance or exploit unintended loopholes in tax laws. Jurisdictions considered as “tax-havens” and low-

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<sup>1</sup> The Policy complies with the UK legislative requirements under Schedule 19, Paragraph 22(2) of the UK Finance Act 2016.

tax jurisdictions should not be used unless there are valid business operations in those jurisdictions.

### Tax compliance and Transfer Pricing

- Sinch is committed to comply with all applicable tax laws and regulations in the countries where Sinch operates. The intention is always to pay the taxes legally due, as well as file all tax returns, in a timely and correct manner.
- Sinch has a transfer pricing policy that aligns with the arm's length principle and the OECD Transfer Pricing Guidelines. Transfer pricing documentation will be prepared and maintained in accordance with local country requirements.
- Tax compliance is generally handled at the legal entity level, with the support of Finance Operations. Local tax advice should be sought from qualified external tax advisors in case of uncertainty about the local tax rules. Other material tax issues, such as for example restructurings, new establishments, intra-group cross-border transfers etc. shall be raised to Group Tax.

### The level of tax risk our business is prepared to accept

- The policy is to have a low-risk approach to our tax affairs. We seek to minimize controversy by respecting not only the letter of the law but also the spirit of the law.

### Relations with tax authorities

- Wherever Sinch operates, Sinch seeks to establish and maintain good relationships with local tax authorities. Sinch undertakes all dealings with them in a professional, transparent, and timely manner.
- These relationships are based on the principles of trust, good faith, professionalism, collaboration, and search for mutual understanding based on reciprocity to facilitate the application of the tax rules, increase legal certainty, and reduce controversy.

### Non-compliance with Policy

- Non-compliance with the Policy may result in disciplinary and/or legal actions.
- Representatives are encouraged to report breaches to their immediate supervisor, Global Head of Tax, Sinch Group's General Counsel or Sinch Compliance. Also, the confidential Sinch SpeakUp Reporting Line can be used.

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