



TERMINALS

Allcargo Terminals Limited

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Corporate Tax Governance Policy

Allcargo Terminals Limited (hereby “ATL”/”Company”) headquartered in India and its core business comprises of Container Freight Stations (CFS) and Inland Container Depots (ICD). Allcargo Terminals Limited carries on activities, which are subject to a large array of jurisdictions, local laws for taxation and international taxation. The Company recognizes the role tax systems play in the continuous growth and development of the countries it operates in. Thus, tax compliance and transparency are crucial to Company, and we have a comprehensive tax strategy in line with our Tax Principles mentioned in this Policy. As a responsible corporate citizen, all tax activities will be carried out in compliance with applicable tax laws and regulations to protect shareholder value, including ATL’s reputation and brand.

Scope and Applicability

This policy is applicable to all corporate offices and facilities of ATL Companies or companies under the management & control of Allcargo Terminals Limited. This policy is applicable from the date of publication until it is superseded. Reference to “tax”, “taxes” or “taxation” are too local as well as global taxation and to all corresponding worldwide taxes and similar duties in respect of which Company has legal responsibilities.

ATL Tax Governance Framework

ATL tax governance framework align with the core value of the company

ATL Values	Tax Governance Framework
Entrepreneurship with a Purpose	<p>Creating Tax Value</p> <ul style="list-style-type: none"> To manage efficiently the tax cost to the company of doing business, including the company’s cash taxes and effective tax rate, within the ambit of all applicable laws <p>Ownership of Risk & Reputation</p> <ul style="list-style-type: none"> To control and manage tax risk and the Company’s reputation through appropriate policies, communication and robust defence. <p>Compliance with integrity</p> <ul style="list-style-type: none"> To ensure the integrity of all reported tax numbers and timely compliance and all relevant statutory tax obligations
Collaboration	<p>Business Partnering</p> <ul style="list-style-type: none"> To be recognized as a vital business partner by our stakeholders and to facilitate the growth and development of the company’s business activities in tax efficient manner. <p>Engagement with tax authorities</p> <ul style="list-style-type: none"> To engage with government & tax authorities constructively and positively in the interest of all our stakeholders.
Innovation Execution &	<p>Tax Technology</p> <ul style="list-style-type: none"> To adopt newer technologies and innovation in place of conventional methods of doing tax compliances
Customer Centricity	People

	<ul style="list-style-type: none"> To develop and enhance our people professionally and personally as a part of world-class tax team in meeting the objectives in a way that will enhance our customer experience.
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Company Tax Principles

The Company Tax principles sets out to govern, manage and disclose tax risks and report tax positions, submit tax returns and pay the correct tax due in a timely and accurate fashion. Furthermore, the company will adhere to the arms' length principal regarding intragroup transactions between Group companies, as set out in current OECD principles and in accordance with current and future Base Erosion & Profit Sharing (BEPS) related developments and implementations and also in accordance with the tax laws of jurisdiction the company operates in

The company tax principles focuses on below aspects:

1. Tax Governance and Tax risk management
2. Tax Planning
3. Policy Engaging Tax Authorities
4. Transactional Data Integrity
5. Controlling & Reporting

Tax Governance & Tax Risk Management

Tax risks can take several different forms (e.g. compliance tax risks, operational tax risks, financial tax risks and strategic tax risks). Tax risk can lead to reputational risk and material financial risk to the ATL.

Tax governance and tax risk management are part of the global ATL risk and compliance processes. Tax governance and control processes are set up in such a way that any tax filing required by law will be submitted timely and accurately and payments of taxes due will be paid in accordance with the submitted tax filings. Each company takes responsibility for applying the principles through the below governance structure:

- Ultimate responsibility for the implementation of the Tax Strategy rests with the Board of each company;
- The executive management of each company member's tax compliance is delegated by the Board to the Chief Financial Officer where the role exists; otherwise, it is delegated to the senior member of the finance team.
- Day-to-day management of each company tax affairs is delegated to the senior member of the tax team and in case, there is no dedicated tax team to the Finance team.
- The teams managing tax affairs are staffed with appropriately trained individuals, drawing on support from the internal tax team and external advisor as necessary;
- The Board of each company ensures that the Tax Strategy is one of the factors considered in all investments and significant business decisions taken.

Each tax team member/finance team will ensure that any material risk is reported to senior management and board members to provide a general overview of the potential liabilities and to advise the senior management on how to mitigate and control these tax risks.

Furthermore, as part of these overall governance and control processes, the company makes sure that the tax positions and any tax risks are correctly and appropriately accounted for in accordance to applicable accounting rules and standards.

As part of tax governance & risk, management advice should be sought from external tax experts/advisor wherever appropriate.

Tax Planning

ATL undertakes a transparent and open tax approach for tax optimization. The attitude towards tax planning ensure the below:

- Seek to maintain the highest of reputations and confidence of all stakeholders
- Comply with all applicable laws and regulations
- Behave in a way that maintains the trust in the ATL by regulators, Revenue Authorities, client & the public.
- Ensure tax affairs are conducted in compliance with tax laws of the jurisdictions in which company operates

Tax planning for the company means take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation.

No business decisions shall be ever influenced or taken which demands shifting of profits to lower tax jurisdictions. The company does not engage in any activities that are at odds with the BEPS principles outlined by the OECD. The company seeks to comply with all International standards as it relates to Inter-group transactions. Company endorses no actions that use secrecy jurisdictions (tax havens) or misuse tax structures.

Engagement with Tax authorities

The company engages with tax authorities in a transparent, constructive and pro-active manner, in which it strives to establish a collaborative relationship with the relevant departments of any tax authority.

On disagreement with a tax authority, we shall work constructively to resolve the issue in a timely manner through appropriate methods of dispute and grievance resolution. We strive to strengthen our relationships with the Government and tax authorities, and advocate for tax legislation that encourage innovation and growth.

If and when necessary and possible, the company will actively reach out to tax authorities to clarify both the company's long term tax position as well as short term uncertainties by requesting upfront explanations, clarifications and agreements.

When possible, company engages in partnerships with the tax authorities and requests for advance agreements on complex tax or transfer pricing matters. The same open and cooperative approach also applies to regular tax audits in most countries where company operates.

Transactional Data Integrity

ATL seeks to ensure that tax issues are properly recognized at the earliest stages of a transaction.

When business is seeking input in relation to transactions, investment or product, the business unit is responsible for providing with all the necessary information.

This information will include a detailed description of the facts, size of the transaction, involvement of third parties or other jurisdictions, the potential exposure from legal action by third parties, external advice received commercial objectives / rationale, timeframe of the transaction and approvals required.

It is the business' responsibility to ensure that the facts outlined as part of the briefing do not change. If the facts do change then the business should inform the Tax Function as and when there is a change.

Controlling & Reporting

The reported financial figures as of monthly-quarterly-yearly closings should be reflecting all accrued and paid taxes for the reporting period.

Absolute transparency is required between local colleagues and company tax team to ensure proper accounting principles as well as controlling and reporting functions can be maintained.

At each reporting period, tax accruals and payment as well as tax provisions should be fully accounted and recognized to ensure no significant adjustments in the financials will be required.

Policy Review

The Policy shall be reviewed periodically, and it is the responsibility of the Chief Financial Officer to ensure such review and applicable updates are performed.

Version	Effective Date	Description of changes
Version 1.0	5 th July 2023	Adoption of Policy at the Board Meeting held on 5 th July 2023