

GAR RESPONSIBLE TAX POLICY

As spelt out in our Code of Conduct, Golden Agri-Resources Ltd and its subsidiaries (“GAR” or the “Company”) are responsible to follow all of the laws that apply to its business activities. Having operations in several countries, GAR is subject to taxes in numerous jurisdictions, and it is, therefore, essential to have a tax policy that prevents any form of tax violation. Aligned with GAR’s Code of Conduct, the Company is committed to adhering to all applicable tax regulations in countries in which it operates, including meeting all applicable reporting obligations timely and accurately. We manage our tax affairs to provide responsible support to our business strategy. GAR also develops a proactive, open and transparent relationship with Tax Authorities in each relevant jurisdiction.

Tax Compliance

GAR is committed to achieve full tax compliance by making all required tax filings and disclosures on an accurate and timely basis, and to make all tax payments when due.

Our Tax Division is staffed by qualified and experienced tax professionals, supported by a reliable accounting system and strong internal controls sufficient to ensure tax compliance in every relevant jurisdiction. The staff regularly attend training to be updated with latest changes in relevant tax regulations and be able to assess any impact and consequence to the Company’s operations. When necessary, GAR also engages external tax advisors to align our business with new tax regulations and/or when GAR has new business operations or transactions.

Inter-Company Transaction and Transfer Pricing Documentation

GAR adopts an arm’s length principle in the pricing of all inter-company transactions to ensure compliance with the prevailing tax regulations related to transfer pricing. Tax Division will be involved in advance if there is any new inter-company transaction so that appropriate pricing can be determined and documented in accordance with the arm’s length principle and Transfer Pricing Documentation requirement.

GAR is committed to be open and transparent in accordance with Transfer Pricing Documentation and Country-by-Country Reporting released by the Organisation for Economic Co-operation and Development (“OECD BEPS Action 13 report”). In line with our policy to comply and follow tax laws and regulations globally, we ensure to fulfill all requirements related to OECD

BEPS Action 13 report such as prepare and submit Local File, Master File and Country-by-Country Reporting in a timely manner.

Relationship with Tax Authorities

A constructive and transparent relationship with Tax Authorities in each jurisdiction is an important component of GAR Responsible Tax Policy. We are committed to provide timely and accurate responses to any enquiries from Tax Authorities. GAR maintains a regular and open dialogue with all relevant Tax Authorities to discuss significant tax matters and work collaboratively to resolve any disputes that may arise due to changes in the tax law or interpretation of tax law. In situations where disagreements or tax disputes arise, GAR will take formal action such as tax objection or tax appeal to resolve any outstanding tax issue. GAR employs suitably qualified staff with relevant certification to represent each legal entity under GAR during any tax objection or tax appeal process.

Tax Solutions for Business

GAR's Tax Division commits to support the Company's operations, business planning and investments. All new products and material business transactions are subject to review by management to ensure that they are consistent with GAR Responsible Tax Policy and the Tax Division is consulted on any sensitive or complex technical matter. The Tax Division will therefore provide appropriate input as part of the approval process for business proposals to ensure a clear understanding of the tax consequences. In situations where the tax law is unclear or uncertain, GAR will seek advice from external advisers and also consult with Tax Authorities to avoid any future dispute.

GAR's Tax Division explores any opportunity to structure certain business, transaction or investment in a tax-efficient manner and responsible way to support the profitability of each business unit and minimise the working capital needed for operations. Despite our goal to be efficient in tax affairs, GAR does not practice aggressive tax planning that is based on unreasonable assumptions.

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