

Tax Policy SP Group

SP Group A/S
Snavevej 6-10
DK-5471 Søndersø
CVR no. 15 70 13 15



Tax Policy for SP Group

SP Group's tax policy reflects the Group's principles, ethical positions and strategy. In SP Group, we are conscious of our obligation to comply with tax legislation and thus also of our responsibility to contribute by paying tax in the countries in which we operate. Our tax payments form an integral part of our overall contributions to society and are a natural consequence of our operations and value creation.

This tax policy applies to all companies of SP Group and covers all tax liabilities to which SP Group is subject.

Governance and responsibility

SP Group's CFO and the chairman of the Audit Committee are responsible for the tax policy. The tax policy is reviewed once a year and submitted to the Audit Committee and the Board of Directors for approval, after which it is published on our website.

Tax practices at SP Group

We strive to always comply with applicable tax legislation and practices in the countries in which we operate. As a result of SP Group's global activities, we have significant intra-group cross-border revenue. Intra-group transactions are completed in accordance with the arm's length principle ensuring that revenue and income are allocated to the

countries where the activities are performed, and earnings are generated.

We manage our global tax matters in a way that is consistent with SP Group's long-standing corporate values and ethical positions. Our approach to tax is structured based on the following principles:

- Our tax matters are based on our commercial activities;
- Tax matters are governed proactively by having a clear internal governance structure, robust business models, processes and controls;
- Reporting and filings to tax authorities as well as payment of taxes must be made in due time;
- We have an open and constructive dialogue with the tax authorities in the countries in which we operate;
- We regularly review the tax incentives available in the countries in which we operate or incentives made available to specific industries in which we operate. Tax incentives are accepted to the extent they are considered appropriate;

- We do not establish ourselves in tax haven countries that are on the EU's list of non-cooperative countries;
- In the event of unclear legislation or practices, or if the tax liability is substantial, we will obtain opinions from professional, well-reputed, independent external advisers, and we will regularly review whether it would be suitable to seek clarification through binding rulings or the like from tax authorities.

Communicating with tax authorities and other stakeholders

We want to maintain a constructive and transparent dialogue with the tax authorities in the countries in which we operate.

We regularly review initiatives supporting increased voluntary reporting on tax matters and determine, with due consideration to SP Group's activities, which information would be relevant to provide in addition to the information we are required by law to provide. We currently provide a country-by-country breakdown of the calculated tax expense, which information is provided in our Group Annual Report. We strive to provide adequate answers to any enquiries about SP Group's tax matters submitted by relevant stakeholders.

Approval and publication

The Board of Directors is responsible for compliance with this policy and for conducting an annual review thereof.

This policy was approved by the Board of Directors on 29 April 2026. The policy is available on SP Group's website www.sp-group.com.

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