



Tax Policy
NOS, SGPS, S.A.

(Approved at a meeting of the Board of Directors on 3 March 2022)



1. BACKGROUND

NOS Group¹ is aware that creating a set of authority and supervision structures, both internal and external, as well as defining good practices and implementing a set of guidelines for the conduct of the company's management, are essential for good corporate governance and respect for the principle of social responsibility.

Tax management and strategy are important elements for decision-making processes and play a significant role in the efficient business performance and success of the company.

The Tax Policy consists of ensuring compliance with the applicable tax legislation and rules and making sure the practices followed are coordinated across all the Group's companies, taking into account social interests and the Group's long-term objectives, avoiding tax risks and inefficiencies when making decisions, and thereby enhancing the creation of value for the shareholder.

Thus, the purpose of NOS Group's Tax Policy is to establish a set of clear principles, values and rules, based on excellence and commitment to best tax practices, helping to guide the performance of the Board of Directors itself, and promoting the creation of value for all the company's stakeholders, including its shareholders.

¹All the companies in a control or group relationship with NOS, pursuant to article 21 of the Portuguese Securities Code [*Código dos Valores Mobiliários*] or any other code that may replace it.



2. TAX POLICY

2.1. Purpose and scope

The Tax Policy of NOS Group brings together its tax strategy, and its commitment to the tax regulations and to the application of good tax practices, fostering cooperation with the Tax Authorities.

This Policy will be applied to all entities of NOS Group.

2.2. Principles:

The tax strategy of NOS Group, and its respective relationship with the Tax Authorities, is based on the following principles:

- Ensuring full compliance with the tax legislation and rules in force in Portugal and in each country where NOS Group operates, through the timely payment of taxes, contributions and other levies owed;
- Monitoring the impacts arising from the introduction of new legislative measures, in order to assess the possible consequences for NOS Group and mitigate any possible adverse impacts;
- Ensuring compliance with all its tax obligations, within the stipulated deadlines, and guaranteeing the appropriate and prudent interpretation of the legislation relating to its operations, with the support of lawyers or external consultants where necessary, and/or requesting the opinion of the local tax authorities when possible;
- Taking advantage of any tax benefits and incentives that are applicable and appropriate to the Group's operations;
- Minimising the tax risks associated with the operations and strategic decisions of NOS Group, through efficient management, enabling it to achieve legitimate and efficient taxation and generate value for shareholders;
- Managing its relationship with the Tax Authority, proactively and in good faith, cooperating and promoting a relationship of trust and professionalism, to ensure the provision of information and the timely delivery of accurate and complete documentation, and providing any clarifications needed for an accurate and transparent understanding of the operations in which NOS Group is involved, mitigating situations of tax litigation;



- Defending its legitimate interests by administrative or legal means, when the payment of any taxes, contributions and other levies raises questions of legality over the interpretation of the applicable rules;
- In the area of transfer pricing, defining the terms and conditions of intra-group transactions, taking into account the OECD rules and guidelines, and the international best practices applicable to this area;
- Defining and implementing frameworks for supervision, review and control of the tax function;
- Assessing the developments and tax implications of operations or matters submitted for the approval of the Executive Committee or the Board of Directors that are relevant factors for decision-making.

2.3. Good tax practices

In the application of the principles outlined above, in order to strengthen its commitment to compliance, development and implementation of good tax practices, NOS Group adopts the following practices:

a) Prevention and control of tax risk

- Aligning and/or integrating the Tax Policy and tax risk management and control systems with the other policies of NOS Group, whether related to the commercial or financial areas or to human resources, or other applicable policies.
- Mitigating significant tax risks by reducing potential conflicts arising from the interpretation of the applicable legal provisions.
- Not incorporating or acquiring companies located in tax havens without valid economic reasons and with the sole purpose of avoiding taxes, and avoiding structures that are not fully integrated and transparent aimed at reducing the tax burden and avoiding compliance with the tax obligations.
- Complying with the arm's length principle with respect to intra-group transactions and complying with transfer pricing documentation obligations.
- Periodically reviewing intra-group contracts and transfer pricing policies.
- Identifying, in advance, any tax risks involved in the relevant investments, transactions and business of NOS Group.



2.4. Resources allocated to implementation

NOS Group is exposed to the evolution of tax legislation and possible interpretations of the application of tax and parafiscal regulations in different ways; therefore, it must ensure that its employees, policies and systems keep abreast of these changes, understanding the trends in tax policy, in order to determine the possible effects of these changes, anticipate the direction of future developments and integrate these factors into the tax and business strategies.

For this purpose, the number, qualification and technical training of the employees allocated to the implementation and execution of tax policy is considered a priority by NOS Group, ensuring that these employees are constantly updated with regard to legislative, doctrinal and jurisprudential developments in tax matters.

In addition, bearing in mind the complexity of the tax system, or the need for an occasional analysis of more critical issues, NOS Group occasionally calls on consultants and lawyers specialised in the area of tax, with proven experience and recognised prestige in this area.

2.5. Monitoring and control

NOS Group will adopt the necessary control mechanisms to ensure compliance with the tax legislation and rules and will promote the monitoring of the principles and good practices referred to above, as well as those that may be implemented in the future.

The Board of Directors, the body responsible for defining NOS Group's Tax Policy, will also ensure monitoring and compliance with the policy.

3. TERM

This Policy will enter into effect on the date of its approval.

The Tax Policy will be revised whenever appropriate, in response to any changes that occur in NOS Group's business model and in accordance with the tax system in force and other applicable tax rules.