



IRPC Public Company Limited

Tax Policy

2026

IRPC Public Company Limited strictly adheres to the principles of sustainable transparency and fairness. When engaging with tax-related matters, these principles are embedded at all levels of our organization to ensure alignment in tax approaches in IRPC PLC. to promote good governance and accountability at all times. We are committed to conducting our business in full compliance with relevant rules, laws and regulations, and firmly believing in paying our fair share of taxes, and trustworthy tax policy of each and every entities of IRPC PLC. operating in every country for the sustainable development and optimizing the tax management for the best benefits oof IRPCPLC. and its stakeholders. IRPC PLC. has established the following Tax Policy as follows.

1. This Policy shall come into force from the date of its announcement.
2. The Announcement of IRPC Public Company Limited No. 004/2023 Re: Tax Policy for IRPC Group Companies, dated 22 June 2023, shall be repealed and replaced by the following provisions.

3. Tax planning and compliance

- COMPLIANCE

Manage the taxation for stakeholders' benefits by paying tax properly as required by law. IRPC PLC. will maintain the organization's reputation and constructive relationships with the relevant state tax agencies and authorities. IRPC PLC. acts in accordance with all applicable laws, regulations, and international standards, and is committed to managing its tax affairs responsibly and transparently, in compliance with both the spirit and the letter of the tax laws in all jurisdictions where the company operates.

- STRUCTURE

IRPC PLC. realizes that profits should be taxed where the economic activities generating the profits are performed and expects to pay 'fair share' of taxes on our activities where they take place. We will publicly report our key financial information, including tax, for the countries in which we operate.

We are fully aware of direct and indirect risks from aggressive tax planning and do not use contrived or abnormal tax structures that are intended for tax avoidance and have no commercial substance. IRPC PLC. do not support any activities, aiming to aggressively structure IRPC PLC.'s

tax affairs. Tax havens are not used for tax planning purposes. IRPC PLC. has thus instilled a policy across IRPC PLC. in setting up our offshore subsidiaries, to avoid foreign jurisdictions considered as tax havens.

- **TRANSFER PRICING**

Transactions between related parties are based on arm's length principle to ensure that the fair share of taxes is paid with respect to our function performed and our business strategies.

- **TAX INCENTIVES**

Consider tax impact for investments and new transactions. This should be carried out by designated party responsible for tax to ensure that transactions and structure are done according to commercial activities and align with business strategies and adherence with prevailing tax legislation. For the benefit of stakeholders, IRPC PLC. will consider tax incentives/exemption available for our commercial activities.

- **TAX RISK MANAGEMENT**

Consider tax risks to ensure that tax risks are identified, managed, and reported to the management and our tax positions are supported by relevant laws. We will regularly review relevant laws to ensure that emerging risks are addressed.

4. Coordination with Government Agencies

- Appoint a party responsible for overseeing tax matters. Coordination with government agencies about tax matters must be done through the designated responsible party to ensure that all relevant information will be timely submitted governing authorities and enhancing transparency of our tax affair.

5. Tax Consultant

- IRPC PLC. shall consider a complex investment project or transaction to ensure that all taxation risks are mitigated, complied with laws and regulations and maximized the benefits. Prior to commence a complex investment project or transaction, IRPC PLC. shall necessarily consider hiring a highly experienced tax consultant.

This Policy shall apply to IRPC PLC.. IRPC PLC. shall encourage its affiliates, subsidiaries, associates and other companies within the IRPC Group to adopt and apply this Policy, as appropriate, provided that such adoption and application do not conflict with applicable laws, rules and regulations; the articles of association of

the relevant entity; the authority of the board of directors of each entity; agreements with shareholders, creditors or third parties; or the specific business context of each company.

Announced and effective on 15 September 2026



(Asst. Prof. Dr. Chaiyaporn Puprasert)

Chairman

Note: This policy has been approval by the Board of Directors, at the meeting number 10/2026 on 21 July 2026