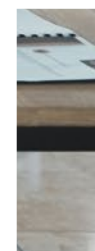
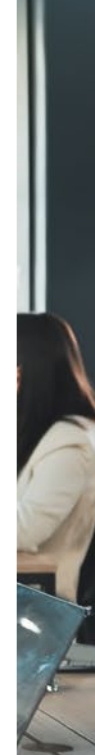


Juli 2023

Tax strategy

PwC NL

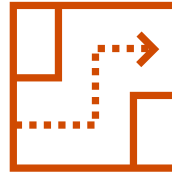


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Introduction



This document sets out the tax strategy of PwC Netherlands ('PwC NL'). The tax strategy gives guidance to all our people on tax matters and on how we act in relation to our clients and third parties we do business with. We consider our tax strategy to be a vital part of our purpose to build trust in society and solve important problems and our role in the further development of sustainable tax. The views presented in this tax strategy are those of PwC NL.



Who we are, what we do, and why



We, PwC NL, are a member of the global network of PwC member firms in 151 countries with 364,000 people. We have a workforce of over 5,700 people. We are committed to delivering quality in assurance, tax & legal and advisory services. Please visit www.pwc.com/structure for further details.

Our purpose and values

Our purpose is to build trust in society and solve important problems. Living up to our purpose not only relates to 'what we do', but also to 'how we do things'. That is why we have formulated values that are in line with our purpose. If we want to add value to our clients and society at large we need to be perceptive to their needs. This requires an outside-in perspective and looking at problems through different lenses. This helps us to become purpose-led and values-driven.

Our values and the underlying behaviours are:

Act with integrity

- Speak up for what is right, especially when it feels difficult
- Expect and deliver the highest quality outcomes
- Make decisions and act as if our personal reputations were at stake

Make a difference

- Stay informed and ask questions about the future of the world we live in
- Create impact with our colleagues, our clients, and society through our actions
- Respond with agility to the ever changing environment in which we operate

Care

- Make the effort to understand every individual and what matters to them
- Recognise the value that each person contributes
- Support others to grow and work in the ways that bring out their best

Reimagine the possible

- Dare to challenge the status quo and try new things
- Innovate, test and learn from failure
- Have an open mind to the possibilities in every idea

Work together

- Collaborate and share relationships, ideas, and knowledge beyond boundaries
- Seek and integrate a diverse range of perspectives, people, and ideas
- Give and ask for feedback to improve ourselves and others

Culture

Our purpose and values are shaping the behaviour of our people and are defining the culture of PwC. We want this culture to be externally focused, with societal involvement and responsibility being the norm.



Act with integrity



Make a difference



Care



Reimagine the possible



Work together



Who we are, what we do, and why



Strategy

The vision for the PwC network, fuelled by our purpose, is to be a trusted and relevant professional services business – one that attracts talent and combines innovative technologies, to help organisations build trust and deliver sustained outcomes.

We are calling our global strategy The New Equation, and it speaks to the two fundamental needs clients and organisations are grappling with today.

First is the urgency to successfully respond to, and change in the face of, the major shifts shaping the world: technological disruption, climate change, fractured geopolitics, and social tension. Second is the need to build trust at a time when it is both more fragile and more complicated to earn.

Delivering sustained outcomes that make a difference

Our approach embodies who we are: a community of solvers coming together with different capabilities and skills to deliver outcomes for organisations, their customers, stakeholders, and communities, which makes a positive and enduring impact right across the value chain.

Our formula is simple: we deliver bold ideas, solutions that are human-led and tech-powered, and meaningful experiences that deliver real-life results.

You cannot buy trust – you have to earn it

Trust has never been more important. It is the link that connects our organisation, our people, our customers, our stakeholders, and the world. We know that trust is not something you can buy off the shelf. It is something you earn through every interaction, every experience, every relationship, and every outcome delivered.

People solving together powered by technology

The New Equation is a future that is human-led and tech-powered. For us, people and technology work hand in hand. It is about how human ingenuity combines with technology innovation and experience to deliver faster, more intelligent, and better outcomes while building trust across the value chain.

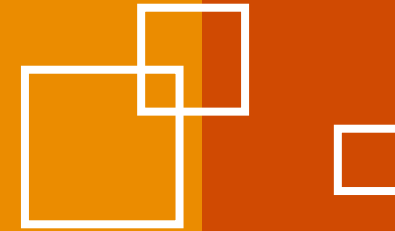
International context

PwC NL is part of a global network of separate and independent member firms operating locally in countries around the world. PwC firms are members of PricewaterhouseCoopers International Limited and have the right to use the PricewaterhouseCoopers name. Members of the PwC network share knowledge, skills, and resources.

Furthermore, PwC NL works closely with the PwC member firms in Germany, Austria, Belgium, Turkey, and Switzerland within the '[PwC Europe](#)' collaboration.



Scope



Our tax strategy applies on two different levels: PwC NL and our tax services. Our tax strategy is based on:

- [Our purpose and values](#);
- [Our business strategy](#);
- [Our Global Code of Conduct](#);
- [Our Global Tax Code of Conduct](#);
- [Our corporate sustainability policy](#);
- [Our stakeholder views](#);
- [The Dutch Association of Tax Advisers code of conduct](#) and [tax principles](#);
- [The Dutch Corporate Governance Code](#).

PwC NL

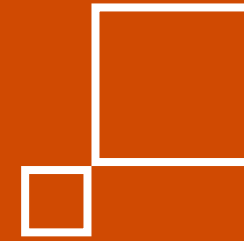
PwC NL consists of Coöperatie PricewaterhouseCoopers Nederland U.A. including its members (the private limited liability companies owned by the professional practitioners ('Partner BVs')), Holding PricewaterhouseCoopers Nederland B.V., PricewaterhouseCoopers B.V. and their subsidiaries, referred to hereafter, both jointly and individually as PwC NL. The professional practitioner whose Partner BV concluded an association agreement with Coöperatie PricewaterhouseCoopers Nederland U.A., is authorised to use the title 'partner' vis-à-vis third parties. For the scope of this strategy, PwC NL also includes partners and their personal holding.

As a member of the global PwC network, PwC NL participates in business initiatives of the PwC network. This may result in the incorporation of PwC network entities in which PwC NL holds an interest. For the purpose of this strategy, we consider these entities to be part of PwC NL. To network entities in the Netherlands in which PwC NL does not hold an interest, we commit ourselves to convey our tax strategy.

All our people have to act in line with this tax strategy in the way they work.

Our tax services

'Tax services' provided by PwC NL to its clients cover a broad range of services including advisory, strategy, digital, reporting, and tax compliance services. These services are predominantly delivered by the Tax & Legal line of service.



Tax principles relating to PwC NL

We have defined the following tax principles for PwC NL:

- We act in accordance with the law and with regulatory requirements. We follow applicable technical standards and comply with professional standards of integrity and objectivity. We abide by the principles of our [Global Tax Code of Conduct](#).
- Our tax professionals behave in line with our Global Tax Code of Conduct and the relevant professional group's code of conduct.
- We are a responsible taxpayer and pay tax where we operate: we declare profits and pay taxes where the economic activities occur.
- We manage all our relevant tax filings, domestic and foreign, with accuracy, in good faith, complete, and on time.
- We only make use of tax incentives that are in line with our business.
- We do not use low tax and non-cooperative jurisdictions¹ unless for economic and commercial reasons.
- We apply the arm's length principle.
- We have designed and implemented specific governance for tax and have a Tax Control Framework to manage our tax risks.
- We engage openly and constructively with the Dutch tax authorities on matters relating to our PwC NL tax affairs, including our approach to tax as laid down in this tax strategy. We share information about our commercial developments or transactions with the Dutch tax authorities, particularly where there are complex tax matters. Where necessary, we seek clearance from the Dutch tax authorities on uncertain tax positions if they relate to our tax affairs.

¹ Jurisdictions pursued to the [Regeling laagbelastende staten en niet coöperatieve rechtsgebieden voor belasting-doeleinden](#).

- Taxation is part of our [stakeholder dialogue](#);
- In line with our purpose, we see tax as a contribution to build trust and deliver sustainable outcomes to businesses and society.

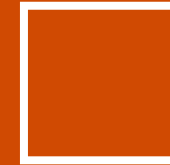
VNO-NCW Tax Governance Code

Coöperatie PricewaterhouseCoopers Nederland U.A. and its subsidiaries endorse the VNO-NCW Tax Governance Code. Given that PwC is a network of independent member firms, PwC NL can only endorse the code with respect to its own tax position. The VNO-NCW Tax Governance Code is intended to increase transparency on the tax position of larger/listed Dutch companies. We embrace this proactive approach regarding our own firm. Should the VNO-NCW Tax Governance Code conflict with our Global Tax Code of Conduct, our Global Tax Code of Conduct will take precedence.

Tax as a contribution to sustainable progress

Tax is aligned with our [corporate sustainability agenda](#). Our material topics represent our most significant impacts on the economy, environment, and people, including human rights. It is related to the impact of our services and operations and is about demonstrating responsible social and environmental behaviour through which we aim to create a positive impact with our people, our clients, and society.

In this context we see tax related to our net zero ambition, hence we consider grants and green incentives, carbon, and energy taxes. Tax can also play a role in how we take care of our people and society and is connected with PwC NL's procurement, HR, learning & development, and financial support to societal organisations.



a. Transparency in our reporting and endorsement

Walk the talk

Transparency enables sustainability. As it is our purpose to build trust in society and solve important problems, being transparent in the way we approach tax is important. As such, this tax strategy is published on our [external website](#) and we report on our tax contribution. This is one of the ways in which we inform our stakeholders on our tax approach and how it is aligned with our strategy.

Reporting externally regarding the execution of PwC NL's tax strategy

We will annually report on the execution of our tax strategy, including our stakeholder dialogue and tax risk management; in particular our ambition to align our Tax Control Framework to our sustainability agenda, and results of the application of our tax principles. We will take into account internationally accepted standards and guidance like the tax reporting standard 207 of the Global Reporting Initiative. As of financial year 2023/2024 we will take into account reporting requirements based on the CSRD.

b. SDGs

We aim to contribute to the UN Sustainable Development Goals ('[SDGs](#)'). For PwC NL taxation plays a role in achieving: SDG 8 (decent work and economic growth), 10 (reduced inequalities), 13 (climate action) and 16 (peace, justice and strong institutions).

Furthermore, we contribute to the development of sustainable tax through thought leadership publications, participating in public debates, and organising and participating in seminars.²

c. Stakeholder engagement

To build trust and deliver sustained outcomes we need to truly understand what society expects of us. We therefore maintain a proactive and [continuous dialogue](#) with our stakeholders, amongst others on our role within the tax ecosystem.

Our stakeholder group is broader than the portfolio of our clients and our people, and the societal environment in which we operate has become increasingly important to our strategy. That is why our ongoing dialogue includes supervisory authorities, interest groups, politicians, and educational and other societal organisations. We use the input of our stakeholders to evaluate and recalibrate our strategy, including our approach to tax. Topics stakeholders frequently address are tax transparency and participating in the public tax debate.

Third parties with which we do business

[PwC's Third Party Code of Conduct](#) explains the minimum standards of integrity and business conduct PwC expects of the third parties PwC does business with. PwC NL expects third parties to require the same levels of integrity and business conduct from their personnel and anyone outside their organisation engaged to provide services for or with PwC NL.

2 Promote peaceful and inclusive societies for sustainable development, provide access to justice for all, and build effective, accountable and inclusive institutions at all levels.



Approach to government roles and assignments

PwC NL has procedures in place on working with and hiring government officials. These procedures are described on [our website](#). The procedures also take into account the way we look at senior PwC persons who join a governmental body.



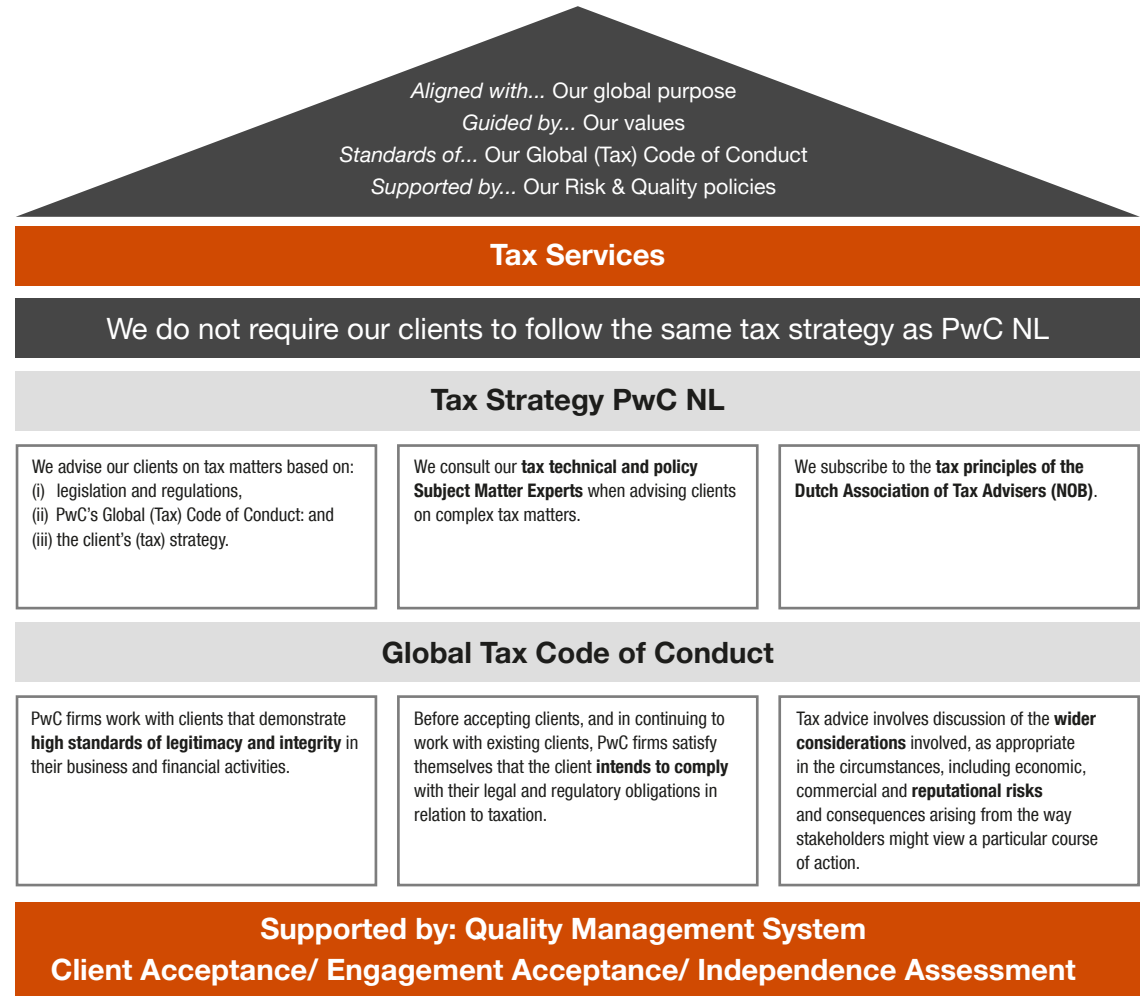


Our tax services

Our role as a tax advisor

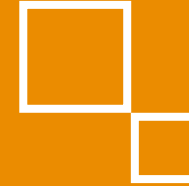
As laid down in our Global Tax Code of Conduct, we see tax as a matter of public interest. For the tax system to be effective, taxpayers need to understand their responsibilities and choices and to comply with applicable tax rules. It is a generally accepted principle that taxpayers, provided they act within the law, have a right to manage their tax affairs as they choose. Our role as tax advisers is to guide our clients in the complex and frequently changing tax environment. We acknowledge that we have a social responsibility to contribute to the integrity of the tax system. We do not shy away from discussing wider considerations with our clients, but we also dare to take a position for our clients.

Our approach is broader than just of a technical nature so that we are able to provide holistic tax advice.





Our tax services



a. Our clients are subject to extensive KYC processes

Within PwC NL all new (and existing) clients are subject to extensive Know Your Customer ('KYC') processes, which are geared at the prevention of financial economic crime and the mitigation of reputational risks. It is in line with our purpose and our role as a gatekeeper, to make sure that we do not enter into, or maintain, client relationships that are detrimental to the trust that is placed in us and that expose PwC NL to unacceptable integrity risks.

b. When advising our clients on tax matters, we consider laws and regulations, our codes of conduct and the client's strategy

With respect to advising our clients on tax matters, it is our mission to be an adviser who delivers sustained outcomes. In this respect, we advise our clients on tax matters based on (i) legislation and regulations, (ii) PwC's Global (Tax) Code of Conduct and, (iii) the client's strategy. We actively incorporate our own opinions and those of our clients' stakeholders into our advice. We present different appropriate options available to our clients taking into account all principles of our tax strategy. However, we do not require our clients to follow the same tax strategy as PwC NL.

c. We consult our tax technical and policy Subject Matter Experts when advising clients on complex tax matters

We consult our tax technical and policy SMEs on complex cases, e.g. if points mentioned under b. collide. The SMEs will review the case against the background of the legislation and regulations, the Global Tax Code of Conduct, and this tax strategy.

d. We comply with rules on independence and conflicts of interest when providing services to our clients

We safeguard independence and address potential conflicts of interest. Any potential conflicts of interest or independence issues are identified before we accept or commence work on a new client or engagement and throughout the course of an engagement. We have proper procedures in place to ensure that potential conflicts of interest or independence issues are timely identified and addressed.



Governance



As part of our broader governance within PwC NL, we have designed and implemented specific governance for tax. Where applicable, PwC NL voluntarily applies the Dutch Corporate Governance Code.

Roles and responsibilities PwC NL's tax affairs

The management of PwC NL's tax affairs requires good governance. The responsibility of the Board of Management of Coöperatie PricewaterhouseCoopers Nederland U.A. for our tax affairs is managed through the portfolio of the CFO in the Board of Management. Our CFO delegates the day-to-day management of our tax affairs to our designated tax partner. Our designated tax partner is authorised to make decisions and sign filings and other documents in relation to the tax affairs of PwC NL. The designated tax partner reports to the CFO on a quarterly basis.

The designated tax partner is supported by the Partner Service Group if activities relate to the partners and their personal holding and partner BVs and by the in-house tax director concerning corporate affairs.

The Board of Management decides how the actual tax behaviour of PwC NL should be executed, taking into account our tax principles. The Supervisory Board of Coöperatie PricewaterhouseCoopers Nederland U.A. supervises the Board of Management. The Partners' Council represents the collective interests of the partner BVs.

Partner Service Group has to be consulted by PwC NL's partners

Partners and their personal holding and partner BVs have to consult the Partner Service Group regarding their tax affairs. The Partner Service Group takes care of the partners' tax compliance and supports and monitors their tax behaviour. If required, the Partner Service Group can discuss questions, trends, and suspected incidents with the chairman and the CFO in the Board of Management and with the designated tax partner. The Partner Service Group reports directly to the CFO in the Board of Management.

Tax & Legal Board

PwC NL has organised its lines of service in three different operating units: Assurance, Tax & Legal, and Advisory. Tax & Legal has its own board, the Tax & Legal Board. The chair of the Tax & Legal Board is also a member of the Board of Management. The responsibility for our tax services is managed through the Tax & Legal Board. The Tax & Legal Board reports to the Board of Management.

Specific circumstances where the Board of Management decides on PwC NL's tax behaviour

There may be specific circumstances not foreseen in this tax strategy or that require additional attention, where the Board of Management decides on the actual tax behaviour of PwC NL.



Governance



Tax Control Framework

To act upon our tax principles, PwC NL has designed and implemented a Tax Control Framework that relates to PwC NL's tax affairs (corporate income tax, value-added tax, and wage taxes). PwC NL's in-house Tax Director is responsible for the Tax Control Framework and the continuous improvement, at least annually, of this framework and for compliance with laws and regulations. The framework is designed to identify tax risks (financial, regulatory, and reputational) related to the most important tax processes and design and to implement controls associated with such risks. Controls are carried out through e.g. interviews, data analysis, and integrated samples and are performed varying from multiple times per day to annually. The in-house tax director supported by internal auditors and the Tax, Reporting & Strategy business unit monitors the correct and effective application of the tax controls. Monitoring takes place by means of inquiry, inspection, observation, and reperformance. PwC NL's Internal Audit Department performs the annual monitoring of the Tax Control Framework. The outcome and follow-up are discussed with PwC NL's in-house tax director and shared with the Board of Management. PwC NL is one of the top 100 largest and most complex companies for which the Dutch Tax Administration/Large Business is competent. In the Individual Supervision Plan, that they prepare annually for each of these top 100 companies, the most important risks are identified and the responsibilities and efforts of both the tax authorities and the company are described.

Technology

Our global strategy The New Equation envisages a future that is human-led and tech-powered. We use technology-enabled solutions in our approach to tax. Technology is a crucial element for tax data and risk management and plays an important role for continuous improvement of our Tax Control Framework.

Training programme for PwC NL partners and employees

To strengthen adherence to our tax strategy, training for our partners and employees is embedded in our learning & development programme.

Code of Conduct Reporting & Whistleblowing Procedure

We recognise that on occasion incidents may occur that we will inevitably have to deal with. PwC NL therefore has a Code of Conduct Reporting & Whistleblowing Procedure. The purpose of the procedure is to enable incidents or suspected incidents of business wrongdoing to be raised safely within PwC NL and to be handled properly, so that suitable measures may be taken in a timely manner. The procedure applies to partners, our people, and third parties. It is also possible to report concerns or questions through the PwC Ethics Helpline. The helpline offers a secure channel and allows for anonymous reporting. More information is available on our [website](#).

Approval and maintenance of this strategy

This tax strategy has been updated and approved by the Board of Management and entered into force on 1 July 2023. The Supervisory Board has been consulted. The tax strategy is subject to periodic review by our Board of Management and will be updated if necessary to continuously reflect our purpose, values, regulations, international tax standards, and other relevant developments in society.

