IOI PROPERTIES
Trusted.

IOI Properties Group Berhad

Group Tax Governance Statement

OVERVIEW

The cornerstone principles of corporate governance at IOI Properties Group Berhad and its Subsidiaries ("IOI Properties") are guided by our Mission Statement:

Trusted... to deliver
Trusted... to build confidence
Trusted... to innovate
Trusted... to conduct our business with integrity
Trusted... to empower our people
Trusted... to safeguard our environment
Trusted... to build sustainable communities

Whereby we are guided by strong values of ethics and integrity to safeguard the interests of all stakeholders at all times. In addition, a set of Core Values guides our employees at all levels in the conduct and management of the business and affairs of IOI Properties.

In the same spirit, the Management is committed to placing good governance at the heart to ensure the tax governance and risk management framework are consistent with our Group's Mission and Core Values.

This Group Tax Governance Statement (the "Statement") sets out IOI Properties' tax policy and approach in conducting its tax affairs and dealing with tax compliance risk. The Statement is reviewed periodically by Group Tax and any proposed amendments will be submitted for review by the Audit Committee and approval by the Board.

It applies to the Board and all employees within the Group in particular those in business operations, finance, and supporting units involved in managing and overseeing the tax affairs. The Statement act as a guidance to drive consistent tax behaviors, professional conduct and our approach to working relationship with Tax authorities and other stakeholders.

1. KEY PRINCIPLES

IOI Properties is committed to conduct its tax affairs based on the following principles:

(a) Ensure that business transactions are driven by business purpose or commercial purpose taking into account IOI Properties' Mission and Core Values;

(b) Timely compliance with all applicable tax laws and regulations of the countries in which it operates in;
(c) The Group believes in paying our fair share of taxes in every country where we operate and also fulfill our good governance responsibilities by complying with the intent and purpose of the applicable tax laws and regulations, recognizing our obligation to withhold taxes and collect other indirect taxes, and delivering these taxes to the government;
(d) Apply due diligence and professional care, including seeking written opinion from third party advisors and confirmations from the tax authorities, where necessary when the revenue legislation is unclear, to ensure that the position taken is supportable and defendable; and
(e) Adoption of transparent, proactive and collaborative professional relationships with the relevant tax authorities to minimise potential disputes and to enhance tax certainty, which includes improving the clarity of legislation, increasing predictability and consistency of tax administration practices, effective dispute prevention, and effective dispute resolution mechanisms.

2. TAX GOVERNANCE & TAX RISK MANAGEMENT

Group Tax, business operations and supporting units in each entity and location are responsible in ensuring timely tax compliance. In addition, Group Tax will work together with the business operations and supporting units to provide advice and guidance in ensuring compliance with the tax laws, regulations and practices to support that business decision making are commercially justified and that appropriate tax implication are considered.

The business operations and supporting units seek input from Group Tax on:
(a) Business proposals to ensure a clear understanding of the tax implications and consequences;
(b) Assessment and management of tax risks to ensure compliance with local and overseas tax legislation in respect of IOI Properties' transactions that may have tax implications, especially business transaction involves new tax jurisdiction outside where the Group is operating;
(c) Tax approach to ensure that a position taken is supported by documentation, legal interpretation and the practice adopted by the tax authorities. Where required, external professional tax advice would be sought in consultation with Group Tax;
(d) Tax audits and enquiries from various tax authorities; and
(e) Update and implementation on new and changes to tax ruling and regulations.

In addition, Group Tax is involved in the planning, implementation and documentation including but not limited to any business acquisitions and disposals, changes in corporate structure, significant business transactions, and services arrangements as well as selection of tax advisors who employ appropriately qualified and trained tax professionals with the right levels of expertise and understanding.

3. APPROACH TO TAX PLANNING

IOI Properties is cognisant of the importance of ensuring any tax planning opportunities are carried out within the ambit of the tax laws aligned with the Group's commercial and economic activities, and will not undertake any aggressive tax planning.

IOI Properties will utilise tax incentives offered by Government authorities provided that they are aligned with intended policy objectives of the Governments which introduced the incentives, supported with genuine commercial activity and consistent with the business and/or operational objectives of IOI Properties.

4. MANAGEMENT OF TAX RISKS

Any changes in relevant tax laws and practices are monitored through regular updates from external tax advisors, professional bodies and dialogues with relevant tax authorities and participation in seminars and conferences. All information will subsequently be disseminated to business operations and supporting units via appropriate channels and periodic in-house update and training.

We regularly monitor relevant changes and developments in the tax systems. We review our corporate and financing structures to confirm that our presence in all countries is grounded in substantive and commercial reasons.

Group Tax, business operations and supporting units have responsibility to determine the technical position to be taken by IOI Properties, with collaborative advice sought from both tax and legal advisors where necessary. For significant tax matters, approval and endorsement is sought from Senior Management and the Board of Directors.

Notwithstanding that our tax position(s) are aimed to be reasonable, responsible, and consistent with legislative intent, there may be instances where they may differ from the position taken by the tax authorities. Where such circumstances arise, written advice will be obtained from external advisors to support the decision-making process where there is uncertainty on the application or interpretation of tax law; or the transaction carries substantial reputational, monetary or regulatory risk.

We seek to manage our affairs consistent with our tax strategy principles and depending on the degree of risk and/or nature of the transactions involved, the tax action/ decisions will be referred to our Senior Management and Board of Directors for approval and endorsement.

5. RELATIONSHIPS WITH TAX AUTHORITIES

IOI Properties seeks to:

(a) Deal with tax authorities and other relevant bodies in a collaborative, transparent, timely and professional manner;
(b) Discuss on application of certain rules and regulations and request for confirmation on technical position, where applicable;
(c) Make fair, accurate and timely disclosure in correspondences and returns; and
(d) Provide response to queries and information requests on a timely basis and seek to resolve issues with the tax authorities to aim for mutual understanding on disputed matters and to obtain agreement on technical positions, where possible.

This Group Tax Governance Statement has been approved and adopted by the Board on 27 August 2026.