Vestas Group
Tax Policy

The Vestas Group Tax Policy outlines Vestas' global management of taxes including governance, structuring and risk management. The policy is approved annually by the Board of Directors.

The purpose of the Vestas Group Tax Policy is to define global management of taxes including governance, structuring and risk management. The policy applies to all decisions that directly or indirectly affect reporting and/or payment of taxes notwithstanding the nature of the tax as long as it falls or could fall under the liability of any Vestas Group Company.

Roles & Responsibilities

The Global Tax organisation is responsible for ensuring that all tax-related matters are executed accurately and responsibly aligned with Vestas' Tax Policy. To achieve this, Global Tax operates through dedicated organisational lines, each dedicated to assessing and managing different aspects of taxation that affect Vestas:

Group Tax is responsible for:
- Maintaining a global tax framework to accommodate the Vestas Business Model
- Global transfer pricing Policy
- Maintaining a global control-framework
- Consolidating the Group tax position
- Managing global tax risk reporting
- Subject matter expert support across Global Tax
- Supporting complex and cross-border matters with tax authorities

Regional Tax Directors are responsible for:
- Application of the global tax framework in close coordination with the Group Tax subject matter experts
- Handling daily communication with tax authorities
- Acting as business partner to Regional business functions in collaboration with the Global tax business partner function
- Overseeing local tax compliance and tax filing
- Monitoring, controlling, and reporting regional taxes to Group Tax
- Managing tax risks related to Regional project execution

The Global Tax Business Partner function is responsible for:
- Ensuring alignment of the Global Tax framework towards new global business cases
- Maintaining close coordination with Regional Tax Directors to align regional and global initiatives
- Facilitating tax structuring in the earliest phases of business development
- Managing tax risks related to Global project execution
- Coordination of legal structures and financing

Shared Service Center is responsible for:
- Selected rule-based accounting & controlling activities that support local compliance processes

Tax Policy

Our approach to tax

Vestas considers a sustainable, socially responsible and compliant tax practice to be a corner stone in contributing positively to the communities we're part of and create a sustainable planet for future generations. By taking a responsible and transparent approach to tax, our tax practice helps sustain the Group's license to operate globally and locally, and we therefore also believe that local operations must be proportionally matched by local tax contributions.

We strive for high tax compliance standards across the Group, and we recognise that tax policy is part of securing the long-term competitiveness of a multinational Group. Therefore, in order to support shareholder interests, Vestas aims at meeting industry standards in the countries we operate, and don't establish subsidiaries or branches in any jurisdictions unless supported by business operations and a physical footprint.

In support of our approach to tax, Vestas' Code of Conduct help ensure integrity and compliance in our corporate decisions, while our Values of Accountability, Collaboration, Simplicity and Passion provide further guidance. In addition, responsible tax planning and tax practices contribute to the UN Sustainable Development Goals and are part of our sustainability strategy "Sustainability in everything we do".

In this policy, we outline the principles that guide our decision making and practice on tax as a multinational entity, including how we ensure we contribute positively to the societies we're part of, and how we navigate the grey areas resulting from multiple jurisdictions' tax legislation with developing tax regimes as well as international organisations such as OECD which can lead to interpretative challenges in situations when the letter of the law is not consistent with the intention of the law.

Tax Governance

The Vestas' tax practice is governed by a global organisation where the roles have been defined to secure an efficient structure where:
- The global tax policy and strategy is centralised in Group Tax along with the global controlling function
- The Regional Tax Directors oversee regional tax positions and ensures compliance with the global tax policy, general tax compliance and tax filing in their respective Region
- The Global Tax Business Partner function collaborates with global business units, providing tax advice for decision-making, planning and execution

Tax Planning

As part of the Global tax policy Vestas has defined guiding principles for a number of issues where difficult decisions must be made on recurrent basis:
- In accordance with the corporate values of Vestas – Accountability and Simplicity – we find aggressive tax planning to be contrary to sustainable development and potentially also damaging to the long-term development and success of our industry. Rooted in the Vestas values we take a responsible and prudent approach to tax planning by focusing on the substance of our business and by not pursuing artificial structures.
- Structuring: Vestas rely on sound legal structures that are based on the individual business cases and does not apply legal structures that are constructed to avoid or artificially defer corporate tax payments or unduly shift the tax jurisdiction governing transactions.
- Tax Havens: When establishing subsidiaries and branches, Vestas will solely consider this based on the business opportunities at

hand. Vestas does not engage in establishing subsidiaries or branches in any jurisdictions where this is not supported by a business decision and a physical footprint. This footprint is typically connected to our production or projects, while Vestas also has offices in some international business hubs such as Singapore and Dubai where we have limited representation. This is not the result of tax planning, but a decision to be close to our business partners and a qualified workforce.

- Tax rulings and APAs: Vestas generally accepts unilateral- & bilateral agreements, Advance Pricing Agreements (APA) and Mutual Agreement Procedures (MAP) as means to secure tax compliance. Based on this, Vestas actively pursues a strategy to confirm the judgement underlying the adopted principles in jurisdictions where complexity is high. Where possible, Vestas seeks to adopt bilateral measures to support transparency.
- Tax incentives: Vestas operates in a number of jurisdictions where the government has introduced and promote incentives to encourage specific investments & activities. Such incentives commonly reduce tax rates or postpone tax payments through advanced depreciations. Vestas seeks to benefit from such tax incentives where these are commonly available across the industry.
- Stakeholder tax planning: Vestas generally expect vendors, partners and customers to share Vestas values in respect to tax planning. To the extent possible Vestas monitor the behaviour of partners from project to project. Based on this screening Group Tax, together with management, continuously evaluate if stakeholders act within Vestas values of integrity and accountability and take appropriate actions.

Investments by Vestas Ventures and Vestas Development

Vestas has established the business unit Vestas Development and the investment company, Vestas Ventures.

Vestas Development is responsible for the funding and development of the wind power projects in the Vestas Development portfolio. Vestas Development identifies project sites, funds and develops the wind power projects, by obtaining all rights and permits that support the construction and operation of them with Vestas' technology. All rights and permits required to be obtained for the wind farms under development (including but not limited to the power purchase agreements, licenses, permits, land rights, contacts, etc.), are key value drivers. Vestas seek to sell the projects to a third-party investor in advance of the start of construction, with the right to sell Vestas' technology and AOM long-term services. It is vital to secure all rights and responsibilities to the project in a separate company whose shares may be sold to a new owner(s). Developing wind power projects is complex and risky and many project opportunities will never make it to construction.

For these reasons, the project development rights and permits will be owned and funded by a special purpose vehicle (SPV), which will enable the isolation and securitisation of assets in a separate company. Different investment structures such as joint ventures or forms of co-investments are sometimes needed, making it necessary to set up a holding structure creating a separation between the operation and the ownership. This allows for flexibility and changes in the ownership structure without interfering with the underlying investment, i.e., the wind power project. Vestas Development invests primarily in projects in greenfield development stage, but also invests in late-stage development projects that may already hold a significant value or where Vestas Development may be offering financial solutions in exchange of Vestas technology and services exclusivity.

Vestas Development will perform the development work either through its own means or through contracted third-party services. For projects acquired, Vestas will in general seek to align the ownership structure to our policy and general approach, but for some projects we may deviate and leave it as-is. This can be a result of a limited holding period or a limited size of the project, which would make it commercially unviable to re-work the structure.

Vestas Ventures is a platform designed to invest into external companies to challenge our status quo and achieve our long-term vision to become the global leader in sustainable energy solutions. The typical investment case for Vestas Ventures will be to take a minority stake in the target company for a medium to long-term holding.

The activities in Vestas Ventures and Vestas Development may from time-to-time lead to the acquisition or investment in projects or companies, which at the point of investment can have a corporate structure that is not fully in line with the tax policy outlined in this document. In line with the above-mentioned Stakeholder Tax Planning, Vestas sees it as an obligation to use its leverage in the planning phase to design an investment structure in accordance with Vestas' values and policies.

Transfer Pricing

Vestas subscribe to the OECD Transfer Pricing framework applying the arm's length principle and as part of the tax policy allocate taxable income where the true and fair value is considered to be created based on general recognised transfer pricing principles.'

Tax Disputes

From time-to-time Vestas is faced with individual tax authorities that disagree to the judgement performed internally by Vestas. This is a consequence of running a global and complex operation, despite a conservative and responsible approach by Vestas to tax governance and tax planning.

Such situations most commonly arise out of transfer pricing where judgements often give rise to a different opinion. In these cases, Vestas seeks to be as transparent as possible in demonstrating the basis for the judgement. Where a common understanding cannot be reached, Vestas will consider escalating to administrative- and judicial courts as well as application of mutual agreement procedures, when available, to eliminate the risk of double taxation.

Tax Risk Management

Vestas recognises that the complexity of a global tax policy require a clear strategy on managing risk. This is supported by the Vestas tax risk management principles that are based on a two-tier system:

- A bottom-up reporting of identified tax risks from local management that is assessed and consolidated centrally, and
- A centralised evaluation of the systemic risks related to operating based on a global business model

The risks are consolidated on a quarterly basis and prioritised based on likelihood and impact. Actions are planned on how to most effectively mitigate and prevent identified tax risks.

The Vestas Material Risk Policy forms a central element of the tax and VAT governance in relation to project activities and corporate structure by securing that decisions with material impact on the tax risk profile will be decided by management based on recommendations from the corporate structure committee and Group Tax.

Controlling is performed on an annual compliance list where local management confirms that they have fulfilled the statutory filing requirements in the jurisdictions where they operate.

Tax risks are included in our tax risk management reporting and reported to management on a quarterly basis together with assurance that sufficient contingencies are in place.

Effective Tax Rate & Payments

Based on the tax policy in place Vestas expect a stable tax rate marginal around the statutory tax rate of the jurisdictions where Vestas has operations and translating into tax payments on par with the reported tax rate.

This policy has been approved by the Board of Directors of Vestas Wind Systems A/S on 13 August 2024.