



**ZANTAT HOLDINGS BERHAD**  
(Registration No. 202101040483 (1440783-X))

## **TAX POLICY**

## 1.0 INTRODUCTION

- 1.1 Zantat Holdings Berhad (“**ZHB**” or the “**Company**”) is committed to conducting its business in a transparent, responsible, and ethical manner, in line with our core values and corporate governance framework.
- 1.2 The Company has established this tax policy (“**Policy**”) to communicate the principles and standards that guide our approach to tax management and transparency, demonstrating our commitment to compliance, integrity, and accountability.

## 2.0 OBJECTIVE

The purpose of this Policy is to establish a comprehensive framework for managing all tax-related matters within Zantat. This policy ensures full compliance with applicable tax laws and conformance with all relevant statutory guidelines in Malaysia.

## 3.0 POLICY SCOPE

This Policy applies to all tax-related activities of Zantat and its subsidiaries, including but not limited to corporate income tax, indirect taxes, withholding taxes, transfer pricing, and any other tax obligations in jurisdictions where Zantat operates. It also covers compliance with the statutory guidelines in Malaysia, which include among others:

- a. Income Tax Act 1967
- b. Goods and Services Tax (GST) Act 2014 (if applicable)
- c. Sales Tax Act 2018
- d. Service Tax Act 2018
- e. Real Property Gains Tax Act 1976
- f. Customs Act 1967
- g. Stamp Act 1949
- h. Labuan Business Activity Tax Act 1990
- i. Double Taxation Agreements (DTAs) entered into by Malaysia
- j. Malaysian Transfer Pricing Guidelines issued by the Inland Revenue Board (IRB)

## 4.0 GUIDING PRINCIPLES

Zantat’s approach to tax management is guided by the following principles:

- **Compliance:** Adhering to all applicable tax laws, regulations, and international best practices.
- **Transparency:** Open and comprehensive disclosure of tax-related information to stakeholders.
- **Accountability:** Clearly defining roles and responsibilities for tax governance across the organization.
- **Fairness:** Ensuring tax practices reflect the spirit of the law and align with ethical and sustainable standards.
- **Risk Management:** Proactively identifying, assessing, and managing tax risks to ensure compliance and sustainability.

## 5.0 TAX GOVERNANCE FRAMEWORK

### 5.1 Board Oversight

The Board of Directors is responsible for approving this Policy and providing strategic oversight. The Board ensures that tax strategies align with corporate governance standards and long-term objectives.

### 5.2 Audit and Risk Management Committee

The Audit and Risk Management Committee supports the Board by:

- Reviewing tax policies, practices, and compliance.
- Ensuring alignment with tax laws and relevant statutory guidelines
- Overseeing tax risk management processes.

### 5.3 Management Responsibilities

The Chief Financial Officer (CFO) manages the implementation of the Policy and oversees all tax-related matters, including:

- Ensuring compliance with tax laws and relevant statutory guidelines.
- Coordinating with external advisors and auditors to ensure compliance with applicable standards.

### 5.4 Internal Controls

Zantat has robust internal controls to:

- Ensure accurate tax filings and timely payments.
- Maintain proper documentation of tax positions and tax compliance.
- Monitor and evaluate tax-related processes and outcomes.

### 5.5 Tax Risk Management

Zantat adopts a proactive approach to tax risk management by:

- Regularly monitoring changes in tax laws and regulations.
- Conducting internal and external reviews of tax compliance and governance.
- Avoiding aggressive tax planning and ensuring alignment with the spirit of the law.

## 6.0 TRANSFER PRICING

Zantat adheres to global and local transfer pricing regulations to ensure all related-party transactions are conducted at arm's length and reflect fair market value. The company maintains comprehensive documentation and conducts periodic reviews to align with Malaysian Transfer Pricing Guidelines.

## 7.0 TAX TRANSPARENCY AND REPORTING

Zantat provides clear, comprehensive, and timely disclosures of our tax contributions and policies in our financial statements and annual reports. By ensuring tax transparency, we build trust and promoting ethical practices within the corporate sector

**8.0 ENGAGEMENT WITH TAX AUTHORITIES AND STAKEHOLDERS**

Zantat values open, honest, and proactive engagement with tax authorities and stakeholders. The company seeks to:

- Resolve tax matters constructively and efficiently.
- Foster trust by adhering to ethical tax practices.
- Align stakeholder communication with tax transparency goals.

**9.0 PERIODIC REVIEWS**

This Policy will be reviewed at least once every 3 years or as and when required to ensure effectiveness and compliance with the governing legislation and regulatory requirement.

**10.0 BOARD APPROVAL**

This Tax Policy was approved by the Board of Directors on 21 February 2025.