TAX POLICY OF GROUPE ADP

THE TAX POLICY OF GROUPE ADP, IN LINE WITH ITS STRATEGY, SEEKS TO PRESERVE THE REPUTATION AND IMAGE OF THE GROUP AND TO MITIGATE THE TAX RISKS TO WHICH IT IS EXPOSED THROUGH THE PERFORMANCE AND DEVELOPMENT OF ITS OPERATIONS.

The Group tax policy complies with the rules and principles issued by the OECD which aim to locate and tax income where it is generated.

The Group must adopt a responsible approach to its tax practices, following an effective tax management model to ensure the Group's tax efficiency in strict compliance with applicable laws and regulations around the world.

For this purpose, the Group's tax policy is focused on three main principles.

1

PREVALENCE OF ECONOMIC ACTIVITY

An efficient tax structure is generally encouraged to the extent that it is designed, sequenced and implemented in accordance with the law and it supports substantive economic activity.

In cases where the Group has legal, technical or commercial reasons to carry out operations abroad, these must not be set up mainly for tax reasons.

In principle, the Group excludes any investment in tax havens or so-called "non-cooperative tax jurisdictions" under French domestic law or OECD standards. Such investments may be undertaken only when they are motivated by real economic activities (e.g. airport construction) other than tax savings.

The same principle of economic reality underlies the transfer pricing policy. Transfer prices are set within the Group in accordance with the principles laid down by the OECD. In this respect, intra-group transactions may have an industrial or commercial purpose only and must be performed under arm's length conditions, taking into account the operational environment, the location of intangibles (know-how, R&D) and the economic circumstances.

2

FAIR TAXATION OF OPERATIONS

The Group strictly adheres to international and domestic tax rules (i.e. local regulations, international treaties, European directives, principles issued by international organisations) and duly pays its taxes in the jurisdictions in which it operates.

In strict compliance with these rules, the Group pursues an efficient, proactive and fair tax management policy.

When applicable tax rules and principles are subject to interpretation, a favourable tax approach may be adopted to ensure the competitiveness of the Group's activities, insofar as this does not undermine the legal certainty of operations.

CONTROL OF TAX RISKS

The management of tax risks forms an integral part of the effective governance of the Group.

Continuous work is done to ensure the accurate calculation of tax costs through increased data reliability, the strong substantiation of technical positions, documented tax alternatives and ongoing improvements to the mapping and handling of tax risks within the Group.

The implementation of periodic reporting, regular tax reviews and monthly tax reconciliation ensure that financials reflect a correctly estimated tax expense.

The existence of specific procedures per tax contributes to the preparation of reliable and exhaustive tax returns in a timely manner and in compliance with applicable legislation.

Finally, the transparency of Group operations and the building of constructive relationships with public and tax authorities should contribute to the mitigation of risks of challenge, potential upward tax adjustments and reputational damage.

GROUPE ADP

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