



Micro Leasing Public Company Limited and Group Companies
(Tax Policy)

Micro Leasing Public Company Limited and its subsidiaries

Tax Policy

Section 1

1.1 Principles and Objectives

The executives of Micro Leasing Public Company Limited and its subsidiaries (hereinafter referred to as the “Group”) have set the strategy for tax operations to be correct, transparent, auditable and sustainable in the long term. Therefore, in order to manage taxes in accordance with the Group’s strategic plan, the Group’s tax management is well-supervised and has a framework for operational risk management, controlling risk assessment, risk monitoring, and risk management and control. The Group’s departments are directly responsible for managing the operational risks of their own departments and setting risk management at an acceptable level, with appropriate resource allocation and the creation of an internal operational risk management culture.

In addition, the Group has issued a tax policy to ensure that tax management complies with the same standards, with efficient and thorough operations, with proper tax payment in accordance with the law, and with guidelines for tax planning for maximum benefit. Guidelines for operations in the event of tax rulings with government agencies, which are measures to prevent the Company’s reputation risk, monetary risk (penalty fees), or tax risk in inter-company transactions. Therefore, the tax policy has been established for operators to use as a guideline in tax operations.

1.2 Scope

This tax policy applies to tax transactions related to Micro Leasing Public Company Limited and its subsidiaries.

Company means Micro Leasing Public Company Limited.

Subsidiary means a company under the control of the Company, which is in accordance with the announcement of the Securities and Exchange Commission.

The Company operates only in Thailand. Therefore, there is no income received or transferred abroad. Therefore, there is no risk of double taxation and risk of income transfer within the group of companies.

Section 2

2.1 Tax supervision

The Group of Companies has a good governance policy, focusing on conducting business with honesty and strictly complying with tax laws and related regulations. There is control of operations according to the tax policy framework and there is a process for reviewing operations according to the policy and a process for approving reports according to the following work procedures:

- Adhere to and comply with the requirements of tax laws and laws related to the Group of Companies' operations by complying with both the written and the spirit of the laws and related regulations, by controlling both direct and indirect taxes and to maximize the benefits of stakeholders.
- Adhere to the payment of taxes in accordance with the duties of those with income to pay taxes as required by law.
- Use tax privileges appropriately. By complying with relevant laws and regulations
- Do not seek opportunities from unusual tax structures to avoid taxes (Tax Avoidance), including avoiding complex tax structures for the purpose of tax avoidance
- Comply with the principle of compensation price that the parties are independent of each other to set prices honestly in business (Arm's length Principle) in determining the transfer price between related companies or persons and do not use the transfer price as a tool for inappropriate tax planning
- Arrange for highly experienced tax consultants to provide tax advice before conducting every complex transaction to ensure that the Group complies with the requirements of tax laws and related laws correctly and completely

2.2 Tax risk management

The Group places importance on tax risk management by complying with the operational risk management policy and emphasizing that the Group's units are aware of and understand the management and control of tax risks in order to operate efficiently and to ensure that the Group complies with the relevant taxes and regulations

1. Tax compliance (Process Compliance)

1.1 Focus on correctness and facts in business operations

- Comply with relevant tax laws and regulations, study new laws and comply with them In case of unclear laws, the Group will consider to follow the principle of transparency as the main principle.
- Prepare tax policies and operational manuals in writing and update them when there are changes in tax laws.
- Assess the impact and determine the operating procedures according to relevant laws and regulations before selling new products or conducting new business. In case of doubt, the Group will seek opinions from relevant government agencies to ensure that the Group manages taxes prudently.
- Set policies for paying taxes and duties appropriately within the time specified by law, using tax privileges correctly and efficiently, while giving the highest importance to maintaining the Company's reputation.
- Record all tax-related accounts completely, arrange for regular review of tax calculations, and store tax reports and documents in appropriate formats, stored in a secure system or location, to ensure that the information is secure and accessible only to relevant persons.
- Regularly organize training to develop the knowledge and skills of operating staff.
- Consider hiring suitable tax consultants to provide advice on planning or provide opinions on complicated matters or matters for which there are no references, including determining the scope of necessary work, negotiating the consulting fees within the Group, including using the Group's experience in the consideration.

- Committed to complying with relevant tax laws and regulations in a timely manner, with proper and complete documentation of tax refund requests, and without incurring fines or expenses due to the Group not complying with regulations.
- Established procedures for reviewing and approving items to reduce the risk of additional tax liabilities.

1.2 Analysis and determination of risks in the company's units with risk management steps

- Define the scope of risk analysis (Objectives Establishment)
- Identify tax risks (Risk Identification) both internal and external risks
- Assess risks (Risk Assessment) including severity of impact (Consequence), possibility of occurrence (Likelihood) and level of control/audit intensity (Internal control)
- Risk mitigation (Risk Acceptance) including risk acceptance (Risk Avoidance)

1.3 Appropriate tax risk management methods by considering

- Impact on the group of companies that may occur if such methods are selected and solutions
- Estimate the cost of management according to such methods
- Impact on the financial position of the group of companies that may be received

2. Monitoring and Reporting

1. There is a person responsible for tax to review and consider tax risks by arranging an effective audit by assessing the tax risks of the group of companies at appropriate periods
2. Arrange for an audit of tax operations by an effective internal auditor, which is part of operational risk management and coordinate with external auditors on issues of risk or damage related to taxes.
3. Arrange for an audit by an external agency or an audit by a tax specialist within an appropriate timeframe and submit the audit results and assessment reports to the relevant agencies, along with reporting significant tax issues from the audit to the relevant management and the board of directors.

Section 3

3.1 Tax operations

1. Tax planning and guidelines

- Tax management by strictly complying with the provisions of the Revenue Code and laws related to business operations to create maximum added value for stakeholders, with the Group taking into account correct tax payment as the main consideration, whereby the Group consults with individuals with expertise in providing advice on compliance with the law.
- Tax payments are made within the timeframe stipulated by law, and the Finance Department is responsible for managing the payment or refund of related taxes to maximize liquidity for the Group.
- Following up on newly issued tax policies, studying the criteria and tax measures and tax benefits, considering the resulting impacts, preparing and informing the responsible departments of the Group so that they can comply with the new laws correctly.
- Considering the tax impacts for investment structure management or when there are new transactions by the Group's tax department.
- Determining the Company's transfer price for intercompany transactions in accordance with the market reference principle. The Company complies with the Revenue Code and related laws.
- The Company does not have a group structure that involves the use of profit transfers to companies with lower tax rates to avoid paying taxes.
- The Company's tax policy has been approved by the Board of Directors before being implemented.

2. Tax coordination and consultation with government agencies

- Provide tax consultants for important tax issues or new transactions that are complicated in tax operations.
- Provide tax personnel to coordinate tax operations with government agencies.

- In the case of new investment projects or new transactions, the tax personnel must be the coordinators to request tax consultations with government agencies or tax consultants for correct operations.

3.2 Tax rulings with government agencies

1. Coordinate with government agencies to provide accurate tax information that is in line with the facts when being investigated by government agencies.

2. In the case of a ruling that affects a significant amount of tax, consider the tax impact and inform the Board of Directors of the facts before proceeding with the clarification or dispute or consenting to the government agency to acknowledge and consider appropriate approaches for operations.