

## **NORDEN Tax principles**

NORDEN Group aims to increase sustainable growth and value creation for society and our stakeholders through responsible and effective tax management. As part of this NORDEN has formalised a set of principles to provide guidance for responsible tax behaviour throughout NORDEN.

NORDEN always complies with current tax legislation in force in countries of operation in line with NORDEN's corporate responsibility as well as the expectations of our stakeholders.

## **Relationship with regulators**

NORDEN respects the right of governments to determine their own tax regime, rates and tax collection mechanisms and their obligation to protect a sustainable tax base.

NORDEN seeks to develop respectful relationships with national tax authorities based on transparency and mutual trust. All dealings with tax authorities will be professional and timely.

## **Compliance**

NORDEN acts in accordance with applicable laws at all times and are guided by OECD Guidelines for Multinational Enterprises, OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations as well as the Statement on Documentation of the Pricing of Controlled Transactions (Bekendtgørelse om dokumentation af prisfastsættelsen af kontrollerede transaktioner). We comply with the tax legislation of the countries in which we operate, and we pay the accurate amount of tax in a timely manner.

NORDEN's tax consists of tax paid according to the regulations of the Danish Tonnage Tax Act for shipping activities as well as according to the applicable tax regulations in all relevant jurisdictions.

NORDEN's approach to tax payment and the nature of our business is transparent. NORDEN regularly makes our financial statements available in timely and transparent communication, including our tax principles. We comply with all relevant transparency rules, including country-by-country reporting.

NORDEN may make legitimate use of tax incentives and exemptions offered by governments. We do not use structures meant for aggressive tax planning or tax avoidance. NORDEN does not use structures that clearly do not meet the intentions of the law, or where commercial motives to use a structure are clearly inferior to the tax motives.

## **Transfer Pricing**

OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administration apply to NORDEN Group, as entities with the Group transact with each other. This entails that Management must ensure that NORDEN Group gives appropriate and timely consideration to transfer pricing requirements in establishing processes, pricing and other considerations for transactions between within the NORDEN Group and in reporting the income derived from such transactions in the tax returns through sufficient documentation.

Transfer pricing requires that pricing of services between entities within NORDEN Group reflect market forces and the arm's length principle, and if this is not the case, the tax liabilities of the associated entities and the tax revenues of the host countries could be distorted.

**Adoption**

The NORDEN tax principles is overseen and has been approved by the Board of Directors 2020-01-16. The principles will be reviewed within 2 years of this date.