

## Fosun Group Tax Guiding Principles

Fosun International Limited (“Fosun”, “we” or “the group”) is listed on HKEX(stock code:00656), certificated by Hong Kong IRD as a Hong Kong tax residence.

### **Our Tax Guiding Principles:**

As a responsible business, we manage our global tax responsibilities in keeping with our mission and values. Our approach to tax aims to align with the needs and long-term interests of our various stakeholders - including governments, shareholders, colleagues at Fosun (i.e., employees) and the communities where we operate:

- ✧ Fosun acts as a responsible global tax citizen, striving to comply with applicable tax law and regulation in respective jurisdiction where we set our foot in.
- ✧ We conduct ethical and transparent tax strategy according to our business economy substances.
- ✧ We maintain honest and open dialogue with tax authority and tax policy maker.
- ✧ We report and disclose our tax position in accordance with applicable domestic and international tax regulation.

### **Tax Code of Conduct and Tax Policy at Fosun**

Under the supervision of the Boards, we are committed to provide transparent and accessible information to tax administrations in order to facilitate an understanding of our tax strategy and the underlying business models. We promote an open and honest dialogue between tax policy makers and businesses as the basis for our daily work.

We meet internationally recognized standards by applying transfer pricing policy. We strive to conduct arm’s length principle in related party transactions according to OECD transfer pricing guideline and domestic transfer pricing regulation.

We hold our operation and tax status transparent in accordance with various international, regional and domestic tax compliance requirement such as Country-by-Country report, Common Reporting Standard, Mandatory Disclosure Regime...etc.

Responding to coordinated international rules and eliminating tax avoidance such as OECD’s Base Erosion and Profit Shifting action plan, we spare no effort to align our tax payment with profit generating activity and refrain from using tax structure which does not have business substance.

Our tax colleagues work together with finance, legal and business team to optimize business efficiency by aligning with location of value creation and our business model according to OECD guideline and local tax laws. This may include the identification of tax efficiencies such as use of applicable conventional and domestic tax incentives, reliefs or exemption which legally and economically permissible. However, it is worth to notice that tax holds no decisive role to

determine how the business is operated.