TAX POLICY FOR FY2025

Atlantic Grupa d.d.

July 2025

Atlantic Grupa Tax Principles

Our Commitment to Responsible Tax Conduct

Atlantic Grupa considers taxation an integral part of its corporate responsibility and long-term value creation. As a responsible corporation, we are committed to conducting our tax affairs in a transparent, responsible and sustainable manner, while complying with both the spirit and the letter of applicable tax laws and regulations in all jurisdictions in which we operate. We recognize that taxes represent an important contribution to the financing of public services, infrastructure, education, healthcare and economic development in the communities where we operate. We therefore seek to maintain high standards of tax governance, tax compliance and tax transparency, consistent with our values of integrity, accountability and responsible business conduct. Atlantic Grupa supports internationally recognized standards of responsible tax conduct, tax governance and tax transparency, including OECD principles and relevant European Union good tax governance initiatives.

Tax Transparency

Atlantic Grupa is committed to maintaining an open, transparent and cooperative approach towards tax matters. We provide timely, accurate and complete tax reporting in accordance with applicable legislation and reporting requirements. Transparency is one of the key principles of our tax approach. We are committed to providing stakeholders with meaningful, accurate and accessible tax-related information through regular public disclosures and tax transparency reporting. To support this commitment, Atlantic Grupa publishes a Public Country-by-Country Report and complies with all applicable domestic and international tax disclosure obligations.

Our key tax transparency figures in 2025

Table 1. Where the Group has its main activity and value drivers

Country	Total revenue	EBT	Paid tax	Current tax	Tangible Assets	No. of employees
Slovenia	520.630.464 €	19.543.947 €	5.140.553 €	4.316.167 €	48.614.994 €	705
Croatia	586.573.004 €	11.583.034 €	3.207.854 €	3.583.187 €	130.341.703 €	2.262
Serbia	626.618.503 €	- 805.676 €	1.092.628 €	1.240.019 €	105.655.431 €	2.244
Bosnia and Herzegovina	84.869.955 €	12.200.649 €	1.597.316 €	1.089.594 €	17.305.431 €	221
Macedonia	88.364.571 €	165.203 €	319.175 €	271.318 €	10.781.954 €	335
Austria	30.326.635 €	216.560 €	71.899 €	69.983 €	313.688 €	32
Russia	15.933.632 €	1.739.310 €	460.520 €	509.120 €	20.352 €	11
Netherlands	31.684 €	- 50.311 €	- €	- €	- €	0
Germany	129.694 €	6.395 €	- €	- €	- €	1
USA	1.203.002 €	1.180.856 €	166.542 €	166.542 €	- €	0

Table 2. How much taxes the Group effectively pays across the main markets

Country	ETR
Slovenia	22,08%
Croatia	30,93%
Serbia	N/A*
Bosnia and Herzegovina	8,93%
Macedonia	164,23%
Austria	32,32%
Russia	29,27%

** Serbia has negative EBT but still pays tax*

Taxes Aligned with Economic Activity and Revenue Generation

Atlantic Grupa believes that taxes should be paid in the jurisdictions where economic value is created and where revenue-generating activities take place. Our tax position reflects the commercial substance of our business operations, including the location of employees, business functions, assets, investments and entrepreneurial activities. We seek to ensure that profits are reported and taxed in the countries where the underlying economic activities are performed and where value is generated. We seek to ensure that taxable profits arise where value is created and where the activities supporting revenue generation are performed. Our geographical footprint, production facilities, workforce distribution and investment profile support this principle and ensure that tax outcomes reflect the economic reality of our operations. Public Country-by-Country reporting further enhances transparency by providing stakeholders with insight into the relationship between revenues, profits, employees and taxes across jurisdictions.

In 2025, Atlantic Grupa generated revenues of EUR 1.2 billion (consolidated), recorded profit before tax of EUR 42.1 million (consolidated) and an income tax expense of EUR 9.97 million, resulting in an effective tax rate of 23.7%. During the year, the Group employed approximately 5,800 employees across its operations. Atlantic Grupa operates through companies and representative offices in 10 countries and exports its products to more than 40 markets worldwide. Through transparent public disclosures, we seek to provide stakeholders with a clear understanding of the relationship between our business activities, financial performance and tax contribution.

Tax outcomes are aligned with the realities of our business operations and are not driven by artificial arrangements or structures designed primarily to obtain tax advantages. Transactions between Atlantic Grupa related companies are conducted on an arm's-length basis and in accordance with the OECD Transfer Pricing Guidelines. Transfer pricing policies are designed to ensure that profits are allocated consistently with the functions performed, assets employed and risks assumed by each group entity. Atlantic Grupa does not seek to avoid taxation through the use of artificial arrangements, aggressive tax planning structures, secrecy jurisdictions or tax havens that lack genuine business purpose or economic substance. Every legal entity within the Group must support a legitimate commercial, operational or strategic objective.

Fair Tax Contribution

Atlantic Grupa is committed to paying its fair share of taxes in the countries in which it operates and creates value. We believe that responsible tax conduct contributes to sustainable economic development and strengthens trust among employees, consumers, investors, business partners, governments and wider society. Our contribution to financing public services, infrastructure, education and healthcare extend beyond corporate income taxes, social security contributions, value-added taxes, customs duties, withholding taxes and other business taxes arising from our operations. Atlantic Grupa continuously supports a wide range of socially responsible initiatives by providing donations and sponsorships to cultural and artistic associations, The Red Cross, sports organizations, volunteer fire brigades, local communities, educational institutions, and many other organizations that contribute to the well-being and development of society. Tax considerations are never the sole driver of our business decisions. Commercial rationale, business strategy, operational requirements and long-term sustainability remain the primary considerations in determining investments, transactions and organizational structures.

Responsible Tax Planning

Atlantic Grupa manages its tax affairs efficiently while respecting applicable laws and regulations in every jurisdiction where it operates. We may utilize tax incentives, reliefs and exemptions where these are explicitly provided by law and intended to encourage investment, innovation, economic development or employment. Such incentives are only applied where they are aligned with our business activities and supported by genuine economic substance. Tax incentives are never the primary driver of investment decisions. They are applied only when supported by genuine commercial activities, long-term business objectives and the creation of sustainable economic value. Atlantic Grupa does not engage in aggressive tax planning, artificial tax structures or arrangements that are disconnected from the commercial reality of its operations.

Relationship with Tax Authorities

Atlantic Grupa seeks to maintain professional, transparent, cooperative and constructive relationships with tax authorities in all jurisdictions where it operates. We engage openly with tax authorities and provide complete, accurate and timely information when required. Where uncertainty arises regarding the interpretation or application of tax legislation, we seek clarification through established legal and administrative procedures and strive to resolve issues through constructive dialogue and mutual understanding.

Tax Governance and Risk Management

Tax governance forms an integral part of Atlantic Grupa's overall corporate governance and risk management framework. Tax risks are identified, assessed and managed through established policies, procedures and internal controls designed to ensure tax compliance and effective risk management. Material tax risks are considered within the Group's broader enterprise risk management framework and are subject to oversight through established governance processes. Atlantic Grupa also monitors developments in international tax legislation, including OECD-led initiatives, EU tax reforms and global minimum taxation requirements. Tax governance processes are regularly reviewed to ensure compliance with evolving regulatory expectations and emerging best practices.

Roles and Responsibilities

The Management Board is responsible for overseeing the Group's governance framework and significant business risks, including tax-related risks. The President of the Management Board has overall responsibility for the Group's risk management framework. The Vice President of the Management Board for Finance, Procurement and IT, together with the Group Tax Director and the Group Tax team, is primarily responsible for managing Atlantic Grupa's tax affairs, implementing tax policies, monitoring tax compliance and managing tax risks. Material tax matters are escalated and reported through the Group's governance structure to ensure appropriate oversight and decision-making. Each Corporate Function is highly aware of the tax policies and risks and informs the Group Tax team prior to commencing any business activity that might have an influence on tax compliance.

Audit Committee Oversight

The Audit Committee oversees the effectiveness of Atlantic Grupa's risk management and internal control systems, including the management of material tax risks. The Group's tax function reports to the Chief Financial Officer, who regularly reports significant tax matters, tax risks and compliance developments to the Audit Committee. The Committee monitors the effectiveness of tax risk management processes and reviews material findings arising from internal and external audits.

International Tax Reporting

Atlantic Grupa is committed to providing stakeholders with meaningful information regarding its tax contribution and tax governance framework. We support greater transparency through public reporting and disclosure of tax-related information. The Group publishes a Public Country-by-Country Report in accordance with applicable legislation and reporting requirements. For the year ended 31 December 2025, the Group reported an effective tax rate of 23.7%. Differences between the effective tax rate and statutory tax rates in individual jurisdictions arise from the local tax legislation specifics, non-taxable income, non-deductible expenses, utilization of tax losses and the application of global minimum tax rules. Atlantic Grupa does not engage in artificial arrangements designed to reduce its effective tax rate. Atlantic Grupa is also within the scope of the OECD Pillar Two global minimum tax framework and recognized a Pillar Two top-up tax expense of EUR 474 thousand during 2025. The Group remains committed to complying with applicable global minimum tax requirements and monitoring further developments in international tax legislation. Through these disclosures, Atlantic Grupa seeks to provide stakeholders with a transparent overview of its tax contribution across the jurisdictions in which it operates.

Continuous Improvement

Atlantic Grupa regularly reviews its tax governance framework, tax policies and tax risk management processes to ensure continued alignment with evolving legal requirements, international standards and stakeholder expectations. We recognize that responsible taxation is an important element of sustainable business conduct and long-term value creation. Through transparent reporting, effective governance and a commitment to aligning taxation with economic activity, Atlantic Grupa seeks to maintain the trust of shareholders, employees, business partners, governments and wider society. We remain committed to continuously strengthening and reviewing our approach to responsible taxation, transparency and good corporate governance, recognizing that responsible tax conduct is an important component of sustainable business performance and long-term value creation.