



# Tax Policy



The obligation to comply with all French or foreign tax regulations applicable to transactions managed on behalf of its customers and on its own behalf is a primary commitment for La Banque Postale Group (LBP).

The tax policy aims to harmonise tax practices within the Group, while preserving local specificities and respecting the Group's compliance rules. It covers all taxes and duties provided for by French or foreign tax regulations applicable to transactions carried out by its customers and on its behalf.

In this context of regulatory compliance, the Bank's Tax Department pursues three main objectives.

## 1 Acting as a responsible taxpayer

La Banque Postale is fully aware of the importance of taxes as a source of public revenue and its contribution to a country's macroeconomic stability and sustainable development. As a bank dedicated to serving the community, it is committed to being exemplary in terms of good tax practices and thus being consistent with its purpose: "to work towards a just transition by creating sustainable and shared value, by supporting the vitality of the regions while respecting the planet's environmental limits".

In its relations with its customers, La Banque Postale refrains from promoting or participating in transactions solely to avoid taxes or allow an undue tax advantage to be obtained.

It also undertakes not to support transactions that facilitate or support transactions with its customers whose effectiveness is based on not sending information to the tax authorities or whose purpose is to participate in contravening tax laws or regulations.

For all of its projects, on its own behalf or for its customers, La Banque Postale ensures that the objective of the transaction, whether economic or asset-based, is non-artificial, consistent, credible and in line with legislative intentions. Transactions essentially for tax purposes are therefore prohibited.

La Banque Postale is prohibited from operating in a country appearing on the official French list of non-cooperative states and territories (ETNC) or the current European tax haven blacklist. It ensures compliance with the tax rules provided for by laws, regulations and international treaties.



In its relations with the tax authorities, La Banque Postale maintains a high-quality and trusting professional relationship by ensuring that it complies with its rights and duties in respect of the legislation.

In addition, La Banque Postale Group is committed to implementing the national and international standards developed in recent years to ensure greater transparency and efficiency in the fight against tax fraud and evasion.

## 2 Anti-fraud framework

With regard to its business and regulatory projects, La Banque Postale seeks the least costly solution for LBP and its subsidiaries while refraining from allowing transactions primarily for tax purposes.

Thus, La Banque Postale does not allow transactions or series of transactions that are fictitious or do not have a real economic or asset motivation, *i.e.* they must be substantial and justified. In this context, the objective of the transaction, whether economic or asset-based, must be non-artificial, consistent, credible and in line with regulatory intentions.

In order to combat any tax optimisation system, La Banque Postale states that the solutions offered to customers:

- Must comply with normal operating procedures adapted to the functioning of La Banque Postale and its subsidiaries, in the interests of its customers,
- Must not facilitate or support transactions with customers whose effectiveness is based on not sending information to the tax authorities or which are intended to participate in contravening tax laws or regulations.

As part of this fight, La Banque Postale shall ensure that tax information and tax culture is disseminated to:

- The Bank's and its subsidiaries' departments, through notes and memos enabling them to take ownership of new regulatory measures impacting their business activity, to enable them to ensure compliance with regulations.
- The Bank's and subsidiaries' customers to enable them to understand regulatory changes and their impact on the offers distributed by the Bank and its subsidiaries.



### 3 Preventing tax evasion

LBP Group carries out the due diligence necessary for the implementation of the American FATCA tax regulations (Foreign Account Tax Compliance Act) as well as the recommendations of the OECD's BEPS (Base Erosion and Profit Shifting) plan, and its implementation at European level through the DAC directives (Directive on Administrative Cooperation) and in particular the implementation of:

- The automatic exchange of information on financial accounts (Common Reporting Standard, CRS, DAC 2);
- The automatic exchange of information on the country-by-country reporting of multinational companies (CBCR, BEPS Action 13, DAC 4),
- The declaration of cross-border arrangements as well as the automatic and mandatory exchange of information collected between tax authorities (DAC 6);
- Strengthening of tax cooperation for digital platforms (DAC 7).

### 4 Implementation of the Tax Policy

La Banque Postale's tax risks are managed by the Tax Department, which reports to the Bank's Finance and Strategy Department. The Tax Department manages tax matters relating to La Banque Postale and provides centralised tax advice for all of La Banque Postale's different business lines and subsidiaries. It helps these different stakeholders prevent and control tax risks.

It is responsible for the Group's tax policy and provides the Group with its expertise for all tax-related issues. It acts independently of other central departments and business lines. Specifically, it is a permanent member of various internal committees, namely:

- ▶ The Product Review Committee;
- ▶ The Prudential Technical Accounting Committee;
- ▶ The Retail Banking, Asset Management and Financial Markets Regulatory Oversight Committee.

It also analyses the tax consequences of the transactions that must be submitted to it. It may seek the opinions of external advisors when tax law is subject to interpretation.