



GLOBAL TAX POLICY

12 September 2024

1. About this Global Tax Policy and Breitling's tax function

The purpose of this policy is to outline Breitling's overall approach regarding its tax matters. Breitling is conscious of its role and responsibility through the taxes it pays in the various jurisdictions in which it conducts its business and its business strategy which focuses on long-term and sustainable growth. This policy is built on pillars emphasizing full compliance with all tax laws and regulations. It furthermore incorporates as a key principle the avoidance of artificial arrangements, or methods of tax avoidance.

This Group Tax Policy has been developed by the Breitling tax team, a group of highly skilled tax professionals who lead tax affairs and ensure adherence to our tax pillars through dedicated policies and internal controls. It is approved by the board of directors and the management team of Breitling.

2. Breitling's tax pillars

Compliance with tax laws and regulations: By always ensuring adherence to both the letter and spirit of all relevant international and domestic tax laws, we seek to avoid tax disputes and minimize tax uncertainty. Breitling continuously monitors the evolution of all relevant regulations and guidelines related to tax to maintain full compliance of its operations. Breitling continuously invests in technology to ensure timely filings and payments of all its taxes. When necessary, Breitling may seek external advice for complex or uncertain tax matters.

Tax planning and domiciles: Breitling endorses a limited tax risk appetite, avoiding aggressive, artificial and non-business driven structures. The Group does not use any artificial or advantageous tax domiciles and is organized exclusively in jurisdictions in which it conducts its business activities. None of the Breitling group entities are based in non-cooperative tax states. Breitling may take steps to procure advantage of reliefs and incentives available under applicable laws and double tax treaties.

Transfer pricing: Our transfer pricing policy adequately reflects the allocation of profits among countries where we operate and in line with the local nexus. We always seek to perform transactions on an arm's length basis and to adhere to all Organisation for Economic Co-operation and Development (OECD) principles along with international and local transfer pricing rules. The group tax team ensures preparation and maintenance of proper transfer pricing documentation.

Approach to requests from tax authorities: Breitling takes reasonable tax positions in accordance with relevant tax laws and regulations. We foster transparent, respectful and trusted relationships with local tax authorities. Due to the complexity of tax matters worldwide we actively engage in open discussions, seeking pre-approvals when possible (e.g., advance pricing agreements). In case of tax audits, we would always seek to settle first and we would litigate when we believe our positions are reasonable.
