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Aguilar de Campoo, January 1, 2025

## 1. PURPOSE

The tax strategy of Galletas Gullón, S.A. and its subsidiaries (hereinafter referred to as “**Galletas Gullón**”) highlights its commitment to promoting responsible taxation, promoting prevention and developing key transparent programmes to build trust among the different stakeholders.

Galletas Gullón daily activity is governed by the principles of fiscal efficiency, prudence, non-repatriation of tax benefits and minimization of tax risk, complying with all the tax obligations required in the territories in which its activity is carried out, thus contributing to its economic and social progress.

## 2. SCOPE


This Policy applies to all companies of Galletas Gullón.

## 3. COMMITMENT

Galletas Gullón is firmly committed to comply with the principles and good practices described by the Tax Administration. The Company is aware of its responsibility for the sustainable economic development of the communities in which it is present and that the taxes it pays are significant in their economies.

That is why Galletas Gullón is committed to responsible tax payment in the countries in which it is present, applying the following policy principles:

- Compliance with the law, following both the letter and the spirit.
- Adopt tax positions based on sound economic and business motives or commonly accepted practices, avoiding abusive tax planning schemes or practices.
- Provide truthful and complete information on operations.
- Prioritize non-litigation avenues for dispute resolution where possible and the possibilities offered by legal procedures to enhance agreements with administrations.
- Here is some evidence of Galletas Gullón's responsible compliance:
  - o Implementation of the Code of Best Tax Practices.
  - o No use of special purpose entities in tax havens.
  - o Policy for the Prevention of Money Laundering and Terrorism Financing.
  - o Internal procedure for the conduct of commercial transactions with countries, natural or legal persons included in the Black List.
  - o Internal procedure to establish transfer prices aligned with value creation and the arm's length principle.
  - o Organizational structure and adequate means to comply with tax obligations.

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Galletas Gullón reconciles responsible compliance with its tax obligations with a commitment to creating value for shareholders.

Perform an efficient management of tax costs and benefits, taking into account the global interests of Galletas Gullón and preventing significant tax risks.

These are some of Galletas Gullón evidences of the fiscal efficiency and defence of its social interest:

- Tax planning aligned with the business and oriented to legitimate optimization.
- Corporate structure aligned with the business and in accordance with the legal requirements and standards of corporate governance.
- Application of tax benefits accessible to all economic operators (R+D+i deductions, freedom of depreciation, capital reserve, etc.).

Galletas Gullón is committed to promote a cooperative relationship with tax administrations. Being a relationship inspired by the principles of trust, good faith, professionalism, collaboration, loyalty and seeking mutual understanding on a basis of reciprocity to facilitate the application of the tax system, increase legal certainty and reduce litigation.

Furthermore, Galletas Gullón applies responsible tax policies that allow the prevention of behaviours that may generate significant tax risks.


These risks fall within the global risk management of Galletas Gullón in order to mitigate or eliminate them and to ensure the defence of the legitimate interests of Galletas Gullón in the event that they are assumed because it was not possible to reach a common understanding with the Tax Administration.

These are some evidences of the responsible tax practices application:

- Approval by the Management Body of the Responsible Tax Policy. Monitoring by said body of the implementation of the strategy and the management of fiscal risks at least once a year.
- Intention to reach conclusions of friendly procedures and agreements with the tax administration system in various matters.

Galletas Gullón is committed to ensuring that transparency is the basis of its performance in the exercise of the fiscal function, and to this end:

- It is obliged to comply with the best external tax reporting standards to facilitate understanding of our tax contribution and our tax policies.
- Incorporation of fiscal objectives in the economic impact, in our Responsible Business Master Plan.
- Corporate structure aligned with the business and in accordance with the legal requirements and standards of corporate governance

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**Communication and whistleblowing. Liability in the event of non-compliance**

Any report regarding the application of this Policy shall be addressed through the Whistleblowing Channel, although it may be made through other channels, subsequently all of them should be channelled through this channel. It is guaranteed that the bona fide informant shall not suffer any retaliation, guaranteeing if desired, her/his confidentiality and anonymity.

Furthermore, this procedure should be used if there is a reasonable suspicion of a non-compliance with the provisions of this Policy, the Code of Conduct or any other procedure established in Galletas Gullón.

In order to have a universal communication channel with Galletas Gullón's stakeholders, a corporate space has been made available to the public in our website to securely, anonymously and effectively share any behaviour that violates this Policy, Galletas Gullón Code of Conduct or any other act/omission that may violate any of the principles or agreements of which Galletas Gullón forms part.

Access: [Whistleblowing Channel \(gullon.es\)](https://www.gullon.es)

This Policy has been reviewed and approved by the CEO on behalf of the Board of Directors of Galletas Gullón on January 1st, 2025.

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Juan Miguel Martínez Gabaldón  
CEO and General Director