

Purpose

This publication sets the tax strategy of Bolt Technology Group and applies to all our Group entities. The Group comprises the ultimate holding company, Bolt Technology OÜ, and all its subsidiaries globally. This tax strategy has been approved by the Board of Directors of Bolt Technology OÜ on 5th of November 2024 and will remain effective until any amendments are approved by the Board.

Bolt Technology OÜ Group tax strategy is overseen by the Chief Financial Officer. A dedicated internal tax team, led by the Head of Tax, is responsible for the implementation of the tax strategy.

Our tax strategy is formulated in compliance with the UK legislative requirements under Schedule 19, Finance Act 2016 to cover our UK operations.

Objectives

Bolt is committed to the highest standards of business and ethical behaviour as well as contributing to the society by fair share of taxes in all the jurisdictions we operate. Our approach to tax seeks to enable and support our business strategy and balance the various interests of our stakeholders, including shareholders, governments, employees, customers, consumers and the communities in the jurisdictions which we operate.

We recognise that non-compliance with tax laws and regulations may give rise to a significant financial and reputational damage to the Group. Our aim is to effectively manage the tax cost within the ambit of the applicable laws by avoiding unnecessary tax risks, while applying tax efficient solutions. In our work, we follow the following principles.

Principle 1: Tax follows business substance

We aim to have a compliant and competitive tax position to support our business objectives. All our transactions must have an economic substance and align with our commercial activity. The group does not undertake - or facilitate - any transactions the main purpose, or one of the main purposes, of which is achieving a tax benefit. If there are legally valid alternatives to reach the same business objective, we prefer the most tax optimal solution whilst fully complying with all relevant and applicable tax laws. The business objectives will never overvalue the requirement to comply with legal requirements.

The tax support to the business is in the context of being an enabler, willing to accept uncertainty and risk in line with our risk appetite. We follow “the more likely than not” principle for making decisions, taking into account the relevant materiality considerations. This means that we would not undertake the transaction unless it is at least more likely than not that our proposed treatment would stand up to examination by the tax authorities.

Principle 2: Professionalism and responsibility

We employ experienced and qualified professionals in our internal tax team to manage our tax

affairs which we continuously develop. In addition, where we lack the necessary in-house competence, we engage external advisors.

We support our businesses in understanding our objectives in reducing tax risks and the methods for their mitigation. The potential tax risks and their relation to the group tax risk appetite is part of any decision-making process.

Principle 3: Compliance with tax regulations

We are committed to complying with all the laws, practices and international guidelines. We proactively identify and manage tax risks and continuously monitor changes in tax law and practice. We submit all the returns and reports, and pay all the necessary taxes, correctly and in due time. Our internal tax team maintains oversight of compliance activities and tax audits.

As a fast-growing, innovative business, we can encounter uncertainty in respect of the tax treatment of our products or transactions we undertake in the various jurisdictions. When legal acts or practice are unclear, we clarify the standpoints with the relevant tax authorities or tax counsels, and, where necessary, with our local auditors, in order to secure the justified positions. These standpoints must be defensible to the extent we believe that, in case of a dispute, we are prepared to defend in tribunals or courts.

We consider it important that taxable profit is divided in the value chain as per the value created in the ordinary course of business. We perform all the transactions between related parties at arm's length in accordance with the OECD Transfer Pricing Guidelines and document it appropriately.

Principle 4: Transparency and cooperation with tax authorities and governments

We create open and trustworthy relationships with tax authorities and rely on their support in all markets in which we operate. We respond to reasonable, legitimate and specific requests from tax authorities and other regulators and disclose information required to enable an informed assessment of our tax position.

We are committed that our platform users are paying their fair share of taxes. We support the legislation that is consistently applied across market participants to enable ease of tax collection and enforcement. We comply with the various global withholding, reporting and information sharing requirements and, if required by law, share information with authorities.

Where material uncertainties exist in relation to the application or interpretation of tax law, we communicate with tax authorities proactively to avoid any potential tax disputes and reputational risks due to improper compliance. In case of requests, we cooperate with authorities in a transparent and compliant manner to achieve a meaningful solution on a timely basis.

We seek to create dialogue with tax policy makers on matters of local and international

importance where the outcome of the subject matter is expected to have a material impact on Bolt.