

Tax Policy Atrium Ljungberg AB

(Resolved at the Board meeting on 20 May 2021)

Purpose and goal

The Tax Policy is based on Atrium Ljungberg’s core values and has been produced to guide our employees on how Atrium Ljungberg works with tax issues.

The goal is for Atrium Ljungberg to be a reliable, long-term and responsible member of society that consistently complies with laws and regulations and that, when required, transparently balances shareholder interests with public interests.

Responsibility and governance

Atrium Ljungberg’s Board of Directors adopts the company’s general tax policy. The CEO is ultimately responsible for compliance with the Tax Policy and can delegate responsibility for this to the CFO.

Our Tax Policy includes the following:

- Atrium Ljungberg works with sustainable urban development and our ambition is to create long-term value growth for shareholders and society, as well as new and existing customers. Taxable gains generated through aggressive tax planning can cause long-term damage to Atrium Ljungberg’s brand and relationships with current and future stakeholders, so aggressive tax planning must not be used when managing tax issues. Aggressive tax planning relates to transactions that are not for commercial reasons, but only aim to reduce tax.
- Atrium Ljungberg must manage tax in accordance with the relevant laws and rules, and tax must be checked, reported and paid correctly.
- The following taxes are the ones that mostly apply to Atrium Ljungberg’s operations: income tax, property tax and VAT. The Group’s Tax Policy supports the employees in all tax-related issues, enabling them to act in accordance with the relevant legislation and to adopt a sustainable commercial approach.
- Atrium Ljungberg’s customers are involved in a wide range of activities that have different rules in place for VAT and property tax. The rules on these taxes are monitored carefully as this is an essential part of the commercial offer with requirements for high predictability and minimisation of administrative expenses.
- Atrium Ljungberg has an extensive project portfolio, which involves substantial investments that are directly deductible in accordance with current regulations. The ambition is always to comply with these regulations and to report this openly to the relevant authorities.
- Any contact with the Swedish Tax Agency and other authorities must be carried out in the spirit of openness and transparency.

- Atrium Ljungberg uses external loans to raise financing for its operations and works with financial instruments, when this is commercially justified. Its financial operations are regulated by Atrium Ljungberg's Finance Policy.
- Atrium Ljungberg's operations are highly capital-intensive and subject to risks that are inherent with this kind of work. The company has recorded taxable losses historically and in conjunction with company acquisitions. There are regulations in place that enable companies to offset previous losses against future profits.
- Atrium Ljungberg uses Group contributions in Sweden and takes a Group-wide approach to taxes.
- The Group does not have any operations or units outside Sweden.

In cases where the rules and regulations are unclear or ambiguous, interpretation is to be based on the spirit of the law, and Atrium Ljungberg is to act proactively and transparently through open claims and advance notification.

Updates

This policy must be updated annually or whenever it is deemed necessary, and is adopted at an ordinary Board meeting that follows the inaugural meeting.