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Information about the implemented tax strategy

Last updated: May 4th 2023

This document constitutes information about the implemented tax strategy of PUMA SE (parent company of the PUMA Group) based in Germany. It describes how the company approaches and implements the tax function. It does not contain any information covered by trade secrets, about industrial knowledge, production processes etc. The information relates to the company's tax year lasting from January 1st to December 31st, 2022. It is updated once a year.

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1. Introduction

As a global corporate citizen with many entities doing business around the globe, PUMA is aware of the many responsibilities that we have – also as a tax payer. One of our most important goals is to treat tax matters with the highest responsibility. Therefore, we are fully committed to act in accordance with tax regulations and to fulfill all our tax obligations. All our business decisions are made primarily based on economic considerations, not tax considerations.

2. Regulatory body within the group

Our Management Board and Chief-Financial-Officer have adopted this PUMA Tax Strategy on behalf of the PUMA Group.

The Board of Directors appoints the Chief-Financial-Officer as the responsible board member for the tax strategy. He oversees the overall adherence to this strategy. He controls the tax strategy and furthermore delegates its execution to the Group Tax Department. The Group Tax Department sets the standards for the tax related topics from a value-added-tax, corporate-income-tax and trade-tax perspective. It is not responsible for customs and excise taxes.

3. Culture

As displayed in PUMAs Code of Ethics, our tax culture can be summarized with its guiding principle "We pay our fair share". We dutifully acknowledge our role as taxpayer and reject illegal tax and customs evasion.

4. Relationship with the tax authorities

We attach high priority to build respectful relationships with the fiscal authorities as we both seek transparency and trust. Consequently, we work collaboratively with the fiscal authorities and try to achieve agreements at any moment in time. We are in close contact with the relevant tax authorities on an ongoing basis, ensuring a high level of trust and reliability.

5. Taxation goals

PUMA respects all tax laws and international standards in all countries where we operate. We strongly encourage an ethical and transparent tax policy. For that reason, we have the following goals regarding taxes:

- PUMA fulfills all requirements for direct and indirect taxes, social contributions, wage taxes and other business-related taxes. This includes the filing of correct tax returns in due time,

- PUMA shows correct tax positions in its books,
- PUMA does deal at arm's length in intragroup transactions,
- PUMA is not using artificial structures without economical benefits that enables it to receive tax benefits,
- PUMA implements an effective tax compliance system

6. Tax havens & Non-cooperative jurisdictions

PUMA does not use so called "tax havens" to avoid taxes and shift profits to these jurisdictions. If Group entities are based in jurisdictions that are either non-cooperative for tax purposes or on the list of jurisdictions that are in cooperation with the EU with commitments taken to implement tax good governance principles, they do exist only for commercial reasons, but not for tax avoidance reasons.

Due to recent changes in the list of the Council to the European Union regarding countries that are non-cooperative for tax purposes (Updated February 14th 2023, FISC 29, ECOFIN 143, 6375/23 "Annex I"), PUMA in 2022 was resident in the following countries:

- Russian Federation (PUMA-RUS o.o.o.)

Regarding countries that are in cooperation with the EU with respect to commitments taken to implement tax good governance principles (Updated February 14th 2023, FISC 29, ECOFIN 143, 6375/23 "Annex II"), PUMA in 2022 was resident in the following countries:

- Hong Kong (PUMA Asia Pacific Ltd.; World Cat Ltd.; stichd Limited; PUMA International Trading Services Ltd.; Development Services Ltd.; PUMA Hong Kong Ltd.)
- Malaysia (PUMA Sports Goods Sdn. Bhd.)
- Thailand (PUMA Sports (Thailand) Co., Ltd.)
- Turkey (PUMA Spor Giyim Sanayi ve Ticaret A.S.)
- Vietnam (World Cat Vietnam Sourcing & Development Services Company Limited - CÔNG TY TNHH DỊCH VỤ PHÁT TRIỂN & NGUỒN CUNG ỨNG WORLD CAT VIỆT NAM)

7. Dealing with Tax risks

It is natural that certain risks arise when doing business internationally. This also applies for tax risks. However, PUMA established a compliance process that makes it possible to identify, report and minimize these tax risks.

8. Mandatory Disclosure Rules (MDR)

Since 2018 the EU Council Directive 2011/16 is in force. It aims at transparency and fairness in taxation and obliges taxpayers in Europe to report cross-border tax arrangements, which meet one or more specified characteristics, and which concern either more than one EU country or an EU country and a non-EU country. It mandates a reporting obligation for these tax arrangements if the requirements of the law are met. Failure to comply with MDR could mean facing significant sanctions under local law and reputational risks for businesses or intermediaries.

PUMA takes the reporting obligation of MDR very seriously. With the support from our professional advisors as well as internally we check the requirements for reporting when any business reorganizations or restructurings are made.

9. Group Tax Policy

Compliance is a very important topic for PUMA. To achieve a high level of proficiency in tax matters, we created a Group Tax Policy. Our Group Tax Policy is part of our internal control system. We are using it as a guideline for our tax compliance topics. It

- describes the tax compliance in the PUMA Group,
- defines our tax culture and the tax compliance goals,
- displays the organization of the tax compliance within the group,
- sets the standards for the compliance monitoring and
- regulates the procedure for handling errors.

It serves as a basis for any local tax compliance management system and can be adjusted if required by local tax regulations. It will be updated and checked at least once a year. All changes are discussed with the CFO.