

TAX POLICY



PREAMBLE

Bouygues is a diversified services group operating in markets with strong growth potential in over 80 countries. Its aim is to make life better every day for as many people as possible. The Bouygues group's six business segments meet customers' essential needs for housing, transportation, low-carbon energy, communication, news and entertainment, in favour of the common good. To support its transformation and bring its entities together around a common vision, the Group has defined four core values:

- **Respect:** treat others how you would like to be treated.
- **Commitment:** commitment is about giving your heart and soul.
- **Pioneering:** bold innovation, not blind ambition.
- **Sharing:** knowledge and experience are meant to be passed on.

The Group's core values are set out and developed in its Code of Ethics and Human Resources Charter. Embedded in those core values is exemplary tax conduct in all the countries where the Group operates.



GEOGRAPHICAL EXPANSION STRATEGY

The Group's decision to establish operations in a particular country is determined by its desire to develop the best possible offering and service for its customers in that country. This strategy, driven exclusively by commercial objectives, is set out at the level of Bouygues SA, the parent company of the Group, which is headquartered in France.

Internal organisational or operational needs may require that the Group be present (albeit very marginally) in countries viewed as low-tax jurisdictions. As a result, for the first time in 2025, the Group has calculated the 15% minimum tax per country developed by the OECD "Pillar 2" that came into force on 1 January 2024. As anticipated, this new tax is immaterial compared with the corporate income tax it pays worldwide. This amount may vary over time, depending on the countries where the Group's projects are carried out.



FISCAL CITIZENSHIP

The Group does not have an aggressive fiscal policy. That means it only enters into transactions that have a strictly commercial motivation and are not artificial. The entities used are not based on tax optimisation schemes. The Group's strategy is solely to achieve its commercial and industrial objectives while making a societal contribution to all its stakeholders. The Group's operations generate a substantial amount of taxes and duties both in France and abroad, constituting a large part of its economic contribution.

The Group pays corporate income tax, withholding taxes, import and customs duties, stamp duties and other taxes in geographies where it operates. It also collects and pays payroll-based taxes in respect of its employees, and indirect taxes like VAT and some industry-specific taxes.

The Group is committed to exemplary tax practices in each country where it operates, and thereby seeks high-quality relations with local tax authorities.

As regards stakeholders (subcontractors, suppliers, etc.) the Bouygues group's Anti-Corruption Compliance Programme prohibits all "payments [] in third countries for purely fiscal purposes".



COMPLIANCE WITH LEGAL REQUIREMENTS AND TAX LAWS

The Group's approach is to comply strictly with local laws. To this end, the remit and resources of its Tax Department are structured in order to fully comply with evolving regulations in countries where the Group operates.

Prior to signing a contract, the Group ensures that the structures executing the contract comply with applicable tax obligations.

And during the life of a contract, the Group fulfils filing obligations in accordance with all laws and regulations and submits returns and pays taxes within the legal time limits.

The Group also communicates factual and narrative information in line with OECD (BEPS action plan) and European Union recommendations. Bouygues reports information about tax in its Universal Registration Document, including the effective tax rate, a tax proof, and the total tax paid in France, abroad and worldwide.

COMPLIANCE WITH OECD PRINCIPLES

Given the significant proportion of the Group's activities carried out in France and the nature of its operations in foreign countries, intragroup transactions between companies resident in different countries are limited. Such transactions are priced in accordance with the "arm's length" principle enshrined in recommendations issued by the OECD and the European Union, and are detailed in the Group's transfer pricing documentation. They are disclosed to the tax authorities in simplified transfer pricing declarations and through annual tax returns, where countries require this.

RELATIONS WITH LOCAL TAX AUTHORITIES

The Group strives to build and maintain constructive relations with local tax authorities based on mutual respect. Wherever possible it works collaboratively to achieve effective dialogue and resolve any disputes. It responds appropriately and in a timely manner to requests for information from each tax authority.

In France, Bouygues has signed up to the *Partenariat Fiscal* (Tax Partnership) with the Ministry of the Economy and Finance in order to consolidate coordination with the Tax Authorities and safeguard against the risks and strategic tax challenges facing companies in the Bouygues SA group tax election. An equivalent approach is fostered with tax authorities in other countries.

MANAGING TAX RISK

The Tax Department, assisted where necessary by external advisors, tries to eliminate the risk arising from uncertainty or complexity in interpreting tax laws and regulations. Despite this, the size of its business and the volume of its tax obligations means that the Group's tax positions may be contested by tax authorities due to differing interpretations. In such cases, the Tax Department aims to defend the Group's interests while respecting the spirit of the law, and the objective sought by the legislator.

GOVERNANCE

This Tax Policy was established at the level of Bouygues SA, the Group's parent company headquartered in France, and has been shared with the Bouygues group Audit Committee and Board of Directors.

Chief Executive Officers and Chief Financial Officers of Group entities, assisted by their tax teams, implement this Policy locally. Chief Financial Officers, with support from internal audit, are also responsible for ensuring that controls and procedures underpinning this Policy are in place, regularly updated and properly applied.

The internal control and risk management systems put in place by Bouygues and described in its Universal Registration Document also apply to the Tax Department. These help to prevent, identify and control the main tax risk factors that might impede the attainment of the Group's objectives.

At least once a year, the Group's Finance Department presents potential tax risks and litigation to the Audit Committee, along with an analysis of the split of taxes paid between the five principal jurisdictions in which the Group operates.

Finally, Internal Audit may carry out audits of the Tax Department and of tax management procedures, and their correct application.