# Coforge Limited Tax Policy

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## Preface

Coforge Limited (hereafter referred to as "Coforge") is a digital services and solutions provider using emerging technologies and deep domain expertise to deliver business impact to various clients. Our Tax Policy is developed in line with company's commitment "*creating value for our stakeholders and adhere to principles of ethical business conduct*". Company's commitment reflects the foremost criticality of corporate governance at Coforge.

## Objectives

- To foster highest levels of corporate governance reinforced by various controls, procedures, and a comprehensive risk management framework.
- To ensure 100% compliance with all applicable tax obligations in accordance with the tax laws and regulations of the jurisdictions within which we operate.
- To ensure transparency with tax authorities and uphold utmost integrity in tax filing, reporting, and payment obligations.
- To ensure that all forms of taxation levied upon Coforge are paid within stipulated period and with accuracy to the relevant authority(ies).
- To continuously foster a theme of transparency and trust in our stakeholder relationships.

## Scope

This policy is applicable to all operations of Coforge Limited present in India. Coforge complies with extant tax regulations and practices in all the countries in which it operates, including India. In this policy, references to 'tax', 'taxes', 'taxation' are to those taxes applicable to the India-specific operations of Coforge.

## Tax Strategy

To ensure that the Tax Policy is wholly embedded in company's business operation, the tax strategy comprises of the six principles elaborated in this section below:

#### 1. Governance

The responsibility of Coforge's tax strategy and governance lies with the Chief Financial Officer (CFO) and implementation of all taxation matters is the responsibility of the Global Head of Tax. Compliance with all applicable tax regulations as well as internal policies, guidelines and governance procedures relating to taxation is tracked and monitored by the taxation department of Coforge. It is the responsibility of Global Head of Tax to oversee the activities conducted by the taxation department. Coforge regards taxation impact as a prime consideration for its business and strategic investment decisions. Significant issues relating to tax are discussed and considered by the Audit Committee on quarterly basis and business strategies and commercial considerations take precedence over tax optimization. Significant business decisions are made with due regard to tax consequences, but predominantly aimed to maximize shareholder's value on a sustainable basis.

#### 2. Compliance: Regulatory and Tax Norms

Coforge is committed to adhering to all local and national regulatory and tax compliances applicable to our operations in India. All applicable transfer pricing rules and regulations for the transactions applicable to Coforge across all tax jurisdictions are complied with. Tax filing, reporting and payment obligations are undertaken in accordance with the rules and regulations of each tax jurisdiction. The company's tax department works in line with business operation team and provides guidance to ensure proper compliance with applicable tax obligations. In case of complexity or uncertainty on an issue, support is sought from external tax experts to ensure absolute compliance.

#### 3. Corporate Strategy and Planning

Coforge's tax planning measures are within the parameters of extant tax rules and regulations, with minimal risks of their non-acceptance by revenue authorities. The company opts to utilize available tax incentives, reliefs, and exemptions in line with the intent of the law and may seek expert advice in cases of uncertainty to promote compliance and diligence. The company has adopted open and transparent tax strategies for tax optimization and business decisions are not influenced nor taken with the intention of 'shifting of profits to lower tax jurisdictions' or creating tax havens. Coforge ensures not to undertake any contrived or artificial tax arrangements which are not underpinned by commercial or economic substance. Due consideration is given to impact on our relationships with stakeholders and the core values of the company.

#### 4. Risk Management

Coforge ensures tax compliance and tax reporting is carried out in a transparent and fair manner with adequate documentation to support these processes. Consideration is given to Coforge's overall high standard of governance, business ethics and core business values. Tax controls, strategies and processes are monitored regularly to identify tax risks for business and legislative changes; the company has a diligent and professional approach to assess tax risks and identify steps for managing and mitigating the identified risks. The tax department provides guidance on appropriate mitigation measures for the identified risks and advice is sought from external experts where appropriate or where there is uncertainty regarding applicability or interpretation of tax law.

#### 5. Transfer Pricing

Coforge's ensures that all transfer pricing computations are based on the well accepted 'arm's-length' principle that are effective within Coforge across tax jurisdictions.

#### 6. Cooperation with Tax Authorities

Tax returns are submitted to relevant tax authorities. Any necessary correction of material errors made or misstatement in tax filing are rectified without any undue delay as and when identified. We ensure full cooperation with tax authorities, with the aim to conduct all such engagements with transparency and respect.

### Amendments to the Policy

The tax department at Coforge monitors local laws and regulations pertaining to taxation that might have a significant impact on this Policy. Any changes required will be approved by the CFO and Global Head of Tax before their integration in updated versions of this policy document. The Board reserves the right to amend this Policy as suggested by the CFO and Global Head of Tax.

Gautam Samanta President