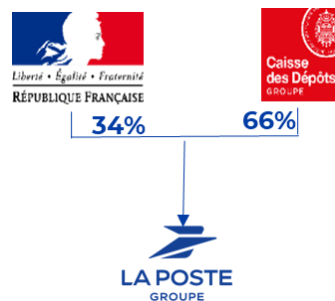


TAX POLICY

A responsible and transparent approach to tax issues

1. Context

- **About La Poste Groupe**



La Poste Groupe is a French group owned by public entities (French State and Caisse des Dépôts), which carries out several activities, including four public service missions assigned by French State:

- Universal postal service,
- Regional development,
- Press transport and delivery,
- Accessible banking.

Its activities are carried out through four divisions:

1. The **Mail-Package Services** division, which handles the Group's core business of mail and press distribution and parcel delivery. It offers services both to individuals and businesses,
2. **Geopost**: as the European leader in parcel delivery and business solutions, Geopost operates on every continent to guarantee more efficient and sustainable trade,
3. **La Banque Postale**, operating in 19 countries, is the 5th largest bancassurer in the EU zone. It supports individuals worldwide, businesses and public sector players, offering a comprehensive range of services accessible to all,
4. The **Retail and Digital** Division brings together La Poste Groupe's main channels in direct contact with individual, professional and public authority customers. It plays a key role in the distribution and marketing of postal and banking services.

As a publicly owned group, La Poste Groupe is a committed corporate citizen. In 2021, La Poste SA was the first public company to qualify as a French "société à mission" which is a French public-interest label.

In fiscal terms, this is expressed in La Poste Groupe commitment to exemplarity and transparency. The publication and enrichment of this tax policy since 2019 reflects this engagement.

- **Organization of the Tax Function: our Governance**

La Poste Groupe relies on a team of qualified and well-trained tax specialists, under the supervision of the Group Tax Director, who is responsible for the Group's tax policy.

In addition to the Group Tax Department team based in France, certain subsidiaries in France and abroad have dedicated tax teams responsible for ensuring compliance with tax regulations. These teams communicate regularly with the Group Tax Department to ensure compliance with Group tax policy.

The Group Tax Department maintains close links with Group business divisions and Branch tax departments to ensure that tax obligations are met at all levels.

It is also committed to exchanging information with business teams to make them aware of any tax issues raised by their activities, and to keep them updated with main tax issues.

During the acquisitions processes, the Group Tax Department investigates whether the Target's tax policy conforms to our own internal tax policy. Once the Target joins La Poste Groupe, the Group Tax Department ensures the former's compliance with our tax policy and applies our processes.

(i) Group Tax Department role

The Group Tax Department is part of the Group Finance Department.

Its main objectives are as follows:

- **Define and implement the Group's tax policy,**
- **Anticipate tax developments and their impact on the Group's financial performance,**
- **Provide tax support:** advice and expertise, and routine tax assistance to all Group companies,
- **Guarantee tax compliance with French and foreign legal requirements for La Poste and its subsidiaries.**

Tax management is structured to ensure that La Poste Groupe complies with the **tax laws and regulations of the countries in which it operates**. In this respect, the Group Tax Department ensures that all its companies comply with tax laws. Additionally, it is in charge of harmonizing the different tax practices among the Group's companies.

In terms of reporting, La Poste Groupe uses the tax reporting systems most commonly used by major French groups.

- **Follow-up on contentious claims and tax audits:** La Poste Groupe is regularly subject to **tax audits carried out by Tax Authorities**. The Group Tax Department ensures that all auditors' requests are dealt with in a timely and accurate manner, and that Group's interests are defended in compliance with tax law.

However, it may happen that Group's tax positions are challenged by tax authorities due to different interpretations of tax law.

The Group Tax Department is in charge of following up on any disputes that may arise.

➤ In 2024, La Poste Groupe was not involved in any tax disputes.

- **Managing tax risks:** identified tax risks are analyzed and monitored by the Group Tax Department, with the support of external consultants where necessary, when tax law is open to interpretation.

The risk management and internal control system set up by La Poste Groupe and described in its universal registration document also applies to tax function. The role of the Group Tax Department is to protect the Group's reputation in all tax-related matters.

The Group Tax Department works closely with tax authorities wherever possible to avoid any risk of tax disputes (please see our later comments regarding the French “tax partnership”).

« Tax risk management is an integral part of the Group's overall risk management process »

- **Providing predictability for the Group:** La Poste Groupe seeks to ensure an adequate financial forecasting for the Group. Accordingly, the Group Tax Department tracks any change or proposed change in the French or foreign tax legislation that could have an impact on our operations.

Robust **tax reporting** systems are in place, enabling tax returns to be prepared on time. These returns are prepared and reviewed in-house and, in some cases, checked by external consultants before being filed.

(ii) Role of the Branch Tax Departments

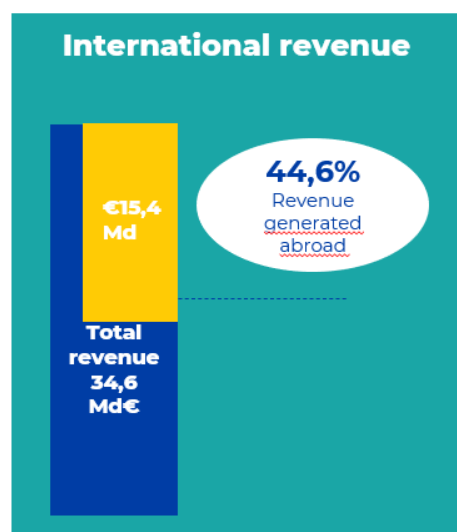
- Dedicated tax teams have been set up in the largest Branches: La Poste Immobilier, Geopost, La Banque Postale and CNP Assurances;
- Their main role is to manage tax affairs of entities within their scope, in liaison with the Group Tax Department.

2. Presentation of Our Tax Policy

- **Our commitments**

La Poste Groupe considers taxation as a fundamental part of its commitment to sustainable and responsible growth.

The Group is present in **more than 60 countries** and **44,6% of its sales are generated abroad**.



The Group is committed to paying its fair share of tax in all the countries where it operates, in compliance with applicable laws and treaties.

It also collects taxes (VAT and customs duties) and makes customs declarations on behalf of French customs authorities, as part of its role as a customs declarant. In that specific role, it carries out controls and works together with the Customs Departments to help fight against VAT and custom duties fraud.

Note that La Poste Groupe has previously published information on tax policies implemented to fight against tax evasion in its universal registration document.

To reinforce this approach, it decided to go one step further by describing its tax policy in a more detailed manner.

- **Our key principles**

The Group's approach to tax is based on several key principles:

- 1. Compliance with OECD principles**

- **Fighting tax fraud and evasion**

The Group is careful not to implement aggressive tax policies that would be disconnected from operating reality, i.e. that could be seen as artificial tax arrangements.

To this end, the Group Tax Department undertakes not to take any tax position that could be considered as tax fraud or evasion. Similarly, it ensures that entities joining the Group comply strictly with these commitments

- **Transfer pricing**

La Poste Groupe is committed to applying the OECD transfer pricing principles. Accordingly, intra-group transactions are determined in accordance with the **arm's length principle**.

Intra-group transactions are detailed in the **transfer pricing documentation** prepared by the Group Tax Department.

The Group also submits an annual "**Country by Country Reporting**" (« **CbCR** ») **statement**, including a breakdown of its profits by country.

Note: intra-group transactions between companies resident in different countries are relatively limited, given the nature of the Group's activities.

- **Pillar 2**

The EU Directive on the Global Minimum tax ("**Pillar 2**" - Directive 2022/2523), which introduces a worldwide minimum tax rate of 15%, came into force on January 1, 2024.

La Poste Groupe falls within the scope of this directive, as its consolidated annual sales exceed the €750 million threshold.

During 2023, the Group began work to assess the impact of the new rules introduced by Pillar 2 on its tax liability. This work consisted in determining the scope of application with regard to the new Pillar 2 rules, and identifying the elements required to calculate an effective tax rate on a country-by-country basis in accordance with the new standards.

For fiscal year 2024, La Poste Groupe has thus complied with all Pillar 2 regulations for the purpose of assessing its tax liability (with no significant impact on the group's accounts).

2. Tax responsibility

The Group takes tax issues in consideration in its operating activities, and may use the options provided by local regulations to reduce its tax or administrative burden.

The Group will only use tax incentives after considering their impact on its reputation and corporate social responsibility.

Essentially tax-driven operations are prohibited: the objective of each transaction must be non-artificial, coherent, credible and in line with the purpose of the law.

3. Strict policy on non-cooperative jurisdictions for tax purposes

La Poste Groupe neither encourages nor promotes tax evasion.

It confirms that its presence abroad is **justified by economic and commercial considerations**, which exclude any offshore implantation that would be driven by attractive tax regimes in those countries.

Any establishment in a country or territory on the French and European list of 'non-cooperative countries and territories' ('ETNC') is prohibited, unless justified by economic or commercial considerations (e.g. universal postal service obligations).

Any relationship whatsoever with partners, distributors and customers resident or established in a country on these lists must be submitted to the Group or subsidiary Tax Department prior to any signature or commitment.

4. Good relations with public authorities

• Relations with Tax Authorities

In its relations with Tax Authorities, La Poste Groupe:

- Verifies the compliance of group operations with local tax law,
- Ensures that tax declarations and tax payments are made in accordance with tax laws,
- Works with local authorities to ensure effective dialogue and to resolve any disputes,
- Ensures that, in the event of a dispute, all necessary information is provided transparently and promptly to the relevant tax authorities,
- Keeps all tax records and implements annual tax reporting,
- Ensures that all decisions are taken at the right hierarchical level and are properly documented to highlight facts, conclusions and potential tax risks.

« Building a lasting, transparent and professional relationship of trust with Tax Authorities is a proof of a responsible tax policy. »

- « Tax Partnership » with French Tax Authorities

In 2024, La Poste Groupe joined the “tax partnership” set up by French Tax Authorities. The aim is to share with them tax issues, as they arise, ahead of tax audits and to obtain tax rulings when needed.

It has signed a contract with French Tax Authorities to participate in this partnership. This reflects the Group's commitment to tax transparency and its desire to maintain and develop a relationship of trust with Tax Authorities.

5. Contributing to public debate

In line with its social responsibility, La Poste Groupe participates in consultations organized by the Government, Tax Authorities and professional and international organizations on the eventual impacts that tax reforms may have on the financial situation of companies.

3. Key Figures

La Poste Groupe is subject to tax in the countries where it operates.



2024

« In 2024, La Poste Groupe recorded a consolidated income tax charge of €800 million »

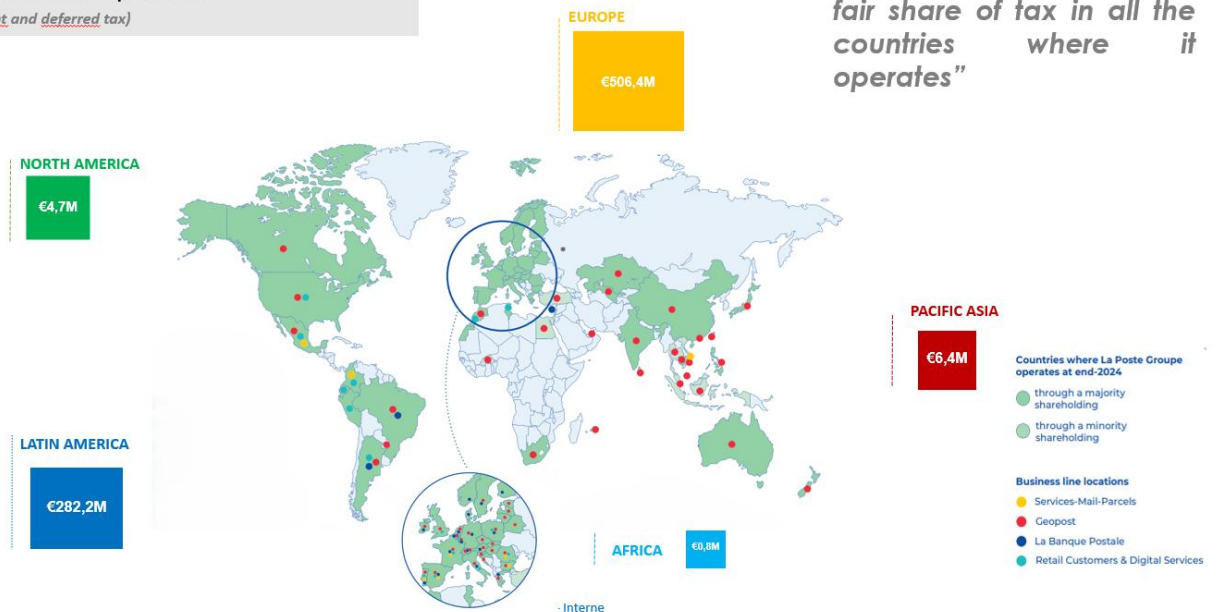
This income tax charge is allocated between geographical areas, as follows:

Allocation of the Group income tax liability between geographical areas (€M)

Fiscal year closed on December 31, 2024 – Data from Group consolidated financial statements

Group income tax expense: €800M

(current and deferred tax)



“Le Groupe La Poste is committed to paying its fair share of tax in all the countries where it operates”

- In addition to corporate income tax, La Poste Groupe pays and collects numerous contributions, such as payroll and social security taxes, sales taxes and local taxes.

- For example, it paid **over € 137 million of local taxes** and **€ 298 million in other taxes** (Business Tax, Value Added Tax “VAT”, etc.) in the year ended December 31, 2024.
- La Poste SA paid **€ 394 million of payroll tax** in the year ended December 31, 2024, and incurred **€ 496 million of non-recoverable VAT**.
- Each year, the Group publishes information related to tax matters in its universal registration document.