

GROUP CORPORATE TAX STRATEGY

Group Corporate Tax Strategy

1. Introduction




UAE Corporate Tax law (“CT Law”) is applicable to financial years starting on or after 1 June 2023. Since RAK Properties PJSC (‘RAKP’) follows January-December as its financial period for reporting purposes, accordingly, the UAE CT law shall apply to the RAKP and its subsidiaries (the “Group”) with effect from 1 January 2024 (i.e., first tax period being from 1 January 2024 to 31 December 2024).

2. Objective

Our vision is to develop a group CT policy that aligns group-level tax strategy practices, captures the tax positions adopted by the group, enables the group to identify tax risks, and helps in mitigating those risks. This policy aims to enable businesses to:

- Promote and streamline tax compliance.
- Develop and improve an organization’s tax risk governance and control framework.
- Achieve greater certainty with respect to its tax affairs.

Our CT strategy focuses on the following key pillars:

 <p>Tax compliance</p>	<p>We prioritize tax compliance by adhering to applicable tax rules, ensuring timely filing and payment of taxes. We employ qualified professionals/ external consultants to oversee, update and implement the corporate tax policies on a regular basis.</p>
 <p>Minimizing tax leakage</p>	<p>We work towards minimizing unintended tax leakages while emphasizing efficient tax management. We are committed to avoiding artificial tax arrangements.</p>
 <p>Transfer Pricing (‘TP’)</p>	<p>We are committed to complying with prescribed TP norms. All intercompany transactions to be undertaken at arm’s-length as per the TP Policy of the Group which is a part of overall CT framework to ensure fairness and compliance with tax regulations.</p>



This policy applies to all Group entities to the extent they are subject to UAE Corporate Tax Law and encourages alignment with the Group’s tax governance standards.



We do not shift value to low-tax jurisdictions or use artificial structures without commercial substance. We avoid secrecy jurisdictions or tax havens for tax avoidance; any presence there is only for genuine commercial reasons and full compliance.

3. Scope

This CT policy pertains solely to UAE CT regulations (including relevant decisions and other guidance issued in the form of guides and FAQs by the FTA as on the date of this policy document). Any taxation matters related to any other UAE law and overseas operations (not having a POEM in UAE) are not encompassed herein and are dealt with in accordance with the rules and laws applicable to such entities.

This Group Corporate Tax Policy is approved by the Board of Directors and is regularly updated to align with regulatory requirements and business changes.