

Global Tax Policy. 2025.

V1.0

Opella.

Executive Summary.

As a B Corp certified multinational consumer healthcare company, Opella has a responsibility to uphold the highest standards of legal and tax compliance in every jurisdiction in which it operates, ensuring full adherence to all applicable local laws and regulations.

Our primary objective is to ensure that all tax obligations are fulfilled accurately, completely, and on time, and that we comply with all other applicable tax requirements.

Oversight and governance of tax matters is primarily ensured by our Central Tax Department led by Opella's Global Head of Tax, who supervises robust tax controls, policy frameworks and standardized procedures. Opella's Global Head of Tax, acting in the direct team of our Group Chief Financial Officer, frequently informs the Opella Executive Committee to ensure transparency. A detailed set of internal tax controls has also been implemented to support the operational effectiveness of the Global Tax Policy.

To maintain operational excellence, our tax matters are furthermore supported by several departments in our various Global Business Services (GBS) centres, with all teams constantly collaborating.

Being a B Corp certified company, part of Opella's tax strategy is also to maintain a sustainable and competitive effective tax rate (ETR) on its operations while upholding our commitment to responsible business practices and community contribution.

Furthermore, we are committed to maintaining an open, transparent, and cooperative approach with tax authorities and other governmental bodies worldwide, promoting responsible tax conduct and full adherence to international tax standards and regulations.

1. Our Tax Approach.

Six principles guiding Opella’s responsible global tax conduct.

1.1. Our Commitment to Responsible Tax Conduct.

At Opella, our mission is to bring health in people’s hands by making self-care as simple as it should be. Our work is guided by a strong foundation of values: respect for and protection of people and the environment, integrity in managing company information, and integrity in our business practices. These principles are embedded in our Code of Conduct and extend fully to our approach to taxation.

We view responsible tax conduct as an integral part of our corporate governance framework.

1.2. Our Global Footprint and Tax Responsibilities.

Opella operates in multiple jurisdictions worldwide and employs more than ten thousand people representing diverse nationalities and cultures. As a result of our global presence and operations, we are subject to a wide range of taxes, including, but not limited to:

- Corporate income taxes at national, federal, state, and local levels.
- Property and asset-related taxes.
- Customs duties and trade-related levies.
- Sector-specific and healthcare-related taxes.
- Employment-related taxes, including social security and payroll contributions.

In addition, we collect and remit indirect taxes, such as value-added tax (VAT), sales taxes, and other consumption taxes charged to customers, as well as employment-related withholdings on behalf of our employees.

We recognize that taxes represent an important contribution to the public finances of the countries in which we operate, supporting infrastructure, healthcare systems, and economic development.

Opella in Numbers 2025.

With our headquarters in France, Opella currently performs business directly in 38 countries through its local affiliates across Europe and Latin America, North America, Asia-Pacific, the Middle East, and Africa, with 13 manufacturing facilities, 7 Science Hubs and approximately 11,000 employees worldwide.

Europe.	Americas.	Asia-Pacific.	Middle East & Africa.
France. HQ Germany Italy Poland Hungary + additional markets	United States Mexico Brazil + additional markets	China Japan Vietnam Australia + additional markets	Tunisia + additional markets

1.3. Compliance and Governance.

As a multinational corporation, Opella has a responsibility to pay the appropriate amount of tax in the jurisdictions where it conducts business, in full compliance with applicable laws and regulations.

Our primary objective is to ensure that all tax obligations are fulfilled accurately, completely, and on time. We are committed to filing all required tax returns and making tax payments in accordance with the governing laws and regulatory requirements of each jurisdiction in which we operate.

Our Tax Policy is grounded in the following principles:

- Full compliance with applicable tax laws and international standards.
- Setting up a globally standardized Tax Operating Core Model, with the inclusion of our respective internal teams, a tax compliance service provider and multiple tax compliance tools.
- Maintenance of robust internal controls and governance processes.
- Alignment of tax outcomes with the underlying economic substance of our activities.
- Transparent and accurate financial reporting.

We do not pursue artificial or aggressive tax arrangements that lack commercial substance or that are inconsistent with our ethical standards.

1.4. Transparency and Constructive Engagement.

Opella is committed to developing and maintaining open, transparent, and constructive relationships with tax authorities and other governmental bodies worldwide. We seek to engage in a cooperative and professional manner, responding to inquiries in a timely and transparent way and working proactively to resolve issues where they arise.

Our Central Tax Department, together with our various departments in Opella's Global Business Services, is responsible for effectively managing our tax audits and litigations. With this cooperation underlined by our tax core model policies and processes, we ensure that all similar procedures are properly supervised and handled with proactive communication towards and with the tax authorities.

Transparency and responsible tax conduct are essential to maintaining trust with all stakeholders.

1.5. Intragroup and Transfer Pricing Approach.

Opella seeks to align transfer pricing outcomes with the underlying economic substance and value creation of our activities.

Opella applies the principles set out in the OECD Transfer Pricing Guidelines to ensure that transactions between affiliated entities are conducted in accordance with the arm's length principle. Our transfer pricing policies are supported by appropriate economic analyses ensuring that the contributions of our affiliates to value creation are fairly remunerated.

We are equally committed to complying with local rules and regulations applicable to our intercompany transactions. Specific analyses are conducted to align the pricing of all intragroup flows with applicable local requirements, and our transfer pricing documentation approach caters to local documentation specificities and deadlines.

To promote certainty and minimize disputes, we may engage in Advance Pricing Agreements (APAs) with relevant tax authorities for material or structural intercompany flows to provide long-term predictability for both Opella and tax authorities and support a transparent and cooperative tax environment.

1.6. Long-Term Value and Shared Growth.

We have a responsibility to our shareholders to safeguard the long-term competitiveness and financial performance of our group. At the same time, we are committed to ensuring that the communities in which we operate benefit from the growth and development generated by our activities.

We believe that responsible tax practices support sustainable business performance, strengthen our reputation, and contribute to stable and prosperous societies.

Through our commitment to integrity, compliance, and transparency, we aim to create enduring value for all stakeholders.

2. Tax Governance, Risk Management & Internal Controls.

Six pillars of Opella's governance and compliance framework.

2.1. Governance and Accountability.

Overall accountability for the implementation, enforcement and yearly revision of this Tax Policy rests with the Global Head of Tax reporting to the Chief Financial Officer who approves the Tax Policy.

The Finance Leadership team, led by the Group Chief Financial Officer, provides independent oversight of our tax strategy and governance framework and receives regular reporting on tax compliance, risk management, and policy implementation.

We aim to provide clear roles and responsibilities at all organizational levels to ensure consistent application of our tax principles worldwide.

2.2. Policy Implementation and Embedding.

Our Tax Policy is embedded throughout the organization and supported by:

- Comprehensive tax procedures and operational guidelines accessible to relevant personnel.
- Regular training programs for finance, tax, and other key functions.
- Alignment with our Code of Conduct and broader business conduct standards.
- Ongoing internal communications addressing regulatory developments and policy updates.

Through these measures, we promote a strong culture of compliance and responsible tax conduct.

2.3. Risk Identification, Management & Monitoring.

We apply a structured and proactive tax risk management framework that includes:

- Periodic risk assessments across jurisdictions and business activities.
- Continuous monitoring of legislative and regulatory developments.
- Defined escalation procedures for significant tax risks.
- Integration with our enterprise risk management system.
- Regular updates with the members of the Finance Leadership Team.

Our approach ensures that tax risks are identified early, assessed appropriately, and managed in a consistent and transparent manner.

2.4. Compliance Evaluation and Assurance.

We regularly assess the effectiveness of our tax compliance framework through:

- Internal tax compliance reviews and self-assessments.
- Internal audit procedures covering key tax processes and controls.
- External audit review of tax positions and provisions as part of the annual financial statement audit.
- Key performance indicators monitoring compliance and reporting quality.
- Annual evaluations of the effectiveness of our tax control framework.

This multi-layered assurance model supports the accuracy, integrity, and transparency of our tax reporting.

2.5. Stakeholder Engagement and Reporting Channels.

We are committed to maintaining open and accessible channels for raising concerns related to tax or other compliance matters. Stakeholders may report concerns through:

- Our Hotline, available 24/7 in multiple languages.
- Our online ethics reporting portal.
- Direct communication with the Global Head of Tax.
- Local compliance officers in relevant jurisdictions.
- Anonymous reporting mechanisms, where legally permitted.

All concerns are treated confidentially, investigated promptly, and addressed with appropriate remedial actions where necessary.

Opella is committed to proactive and transparent stakeholder engagement in relation to its tax strategy and practices. It systematically identifies and engages with relevant internal and external stakeholders to gather their perspectives. Feedback is collected through a range of channels, the Company then carefully evaluates this input and incorporates relevant insights into its tax decision-making processes, ensuring that its approach remains responsible, balanced, and aligned with applicable regulations as well as broader societal expectations.

2.6. Public Tax Reporting.

Our public tax disclosures are subject to:

- External audit by our independent auditors as part of the annual financial statement audit.
- Internal review and approval processes involving senior management.
- Oversight by the Global Head of Tax.

We comply with applicable tax disclosure and reporting requirements in all relevant jurisdictions.

3. Business Taxes Paid In 2025.

Income and local business taxes paid by region (in kEUR).

Region.	Company Income Tax.	Other Business Taxes. ¹
EMEA	73,927	12,113
ASIA	27,030	20,155
LATAM	19,712	4,269 (credit) ²
NORTH AMERICA	—	185
TOTAL	120,669	28,184

¹ not inclusive of employment-related taxes, VAT and customs. ² local tax credit amounts included in the balance.

CIT PAID. 120,669 k€	OTHER TAXES. 28,184 k€
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Customs duties paid. Top 10 countries.

Top 10 countries represent ~100% of total customs duties paid in FY2025.

Country.	Customs Duties (€).
United States	4,516,709
Mexico	2,886,335
Argentina	1,429,985
Brazil	1,000,000
France	146,757
Ecuador	48,861
Colombia	43,849
Australia	25,622
Germany	25,451
Italy	1,781
Total	10,125,350

TOTAL CUSTOMS DUTIES PAID IN 2025. €10,125,350 Across top 10 countries.	SHARE FROM USA. 44.6% Single-largest contributor.
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Document History.

Version Number.	Version Application Date.	Description of changes.
1.0	30/04/2025	First issuance of this Tax Policy.

Issued by.	Central Tax Department.
Verified by.	Finance, Legal, Ethics & Business Integrity, Risk Management.
Approved by.	Chief Financial Officer.
Diffusion.	Public and internally.