TAX STRATEGY
FOR FINANCIAL YEAR 2025

HUGO BOSS

I. Introduction

As the Management Team of HUGO BOSS, we firmly believe that paying tax is of central importance to our global economic and social relationships. By paying our taxes, we assume responsibility for our actions in every country in which we operate. Our tax payments are an important contribution to the expansion and maintenance of infrastructure and social cohesion in every one of these countries, as well as representing a cornerstone in our commitment to conduct and develop our business in a sustainable, fair and cooperative manner across the world.

Despite the fact that there is not always absolute certainty regarding tax in international business transactions, which leaves some space for interpretation, HUGO BOSS recognizes its clear responsibility in respect of local legislation. This forms the basis for the responsible and dutiful treatment of tax matters and is in line with the company's ambition to comply to all applicable laws and regulations. For this reason, tax compliance for HUGO BOSS is more than gearing our decision-making processes to the exact wording of the law. HUGO BOSS commits to fully comply with the spirit as well as the letter of the tax laws and regulations in the countries in which it operates.

For this purpose, HUGO BOSS has drawn up the following guiding principles in the form of a tax strategy aimed at ensuring that legal obligations are met throughout the Group as a whole, as well as aligning it with our economic activities. The following tax strategy was developed by the Group Tax Department and approved by the management board and the Audit Committee.

II. Tax compliance

HUGO BOSS has introduced a global body of rules for all its employees worldwide. This code of conduct sets out the company's fundamental values and summarizes "Conduct in Compliance with the Law" as follows:

"It goes without saying that HUGO BOSS is committed to complying with the law. In particular, violations of the law that are criminal offenses or that could be injurious to HUGO BOSS's reputation must be avoided at any cost. Every employee must be aware of and understand the laws and internal policies that are relevant for their area of responsibility. Superiors, Legal, Data Protection and Compliance are available to provide support and advice."[1]

The code of conduct, which can be accessed by all employees at any time, provides all employees with a set of rules on how to proceed in the event of unlawful or unethical behavior. All employees must immediately report suspected cases to their own superior, the subsidiaries' Compliance Officers or the Group Compliance Officer. Of course, this reporting procedure can be carried out anonymously.

As a matter of principle, the Group Tax Department is involved in the process of continuously meeting all the Group's obligations under the tax law. This is particularly the case when decisions are made as part of processes that affect the entire Group or that could have an impact on the reputation of HUGO BOSS. The aim is to ensure tax compliance in all departments that deliver information which is relevant for the tax department and/or that are subject to tax obligations.

The HUGO BOSS Group Tax Department establishes guidelines and directives for this purpose. Therefore, each transaction within the Group follows the arm's-length principle as set out in the OECD guidelines. Our transfer pricing principles prevent tax avoidance through manipulated pricing. All transactions are backed up with appropriate documentation of the underlying facts, purpose and pricing mechanism. It also offers regular training in this area. Due to increasing digitalization, tax reporting is supported by a first-class global tax reporting tool, which ensures

[1] The current version of the HUGO BOSS Code of Conduct is available at: https://group.hugoboss.com/fileadmin/user_upload/Code_of_Conduct/HUGO_BOSS_Code_of_Conduct.pdf

a high degree of transparency and assurance that the reported figures are accurate. To fulfil the reporting obligations entirely and in compliance with the OECD, arising due to the BEPS (Base Erosion and Profit Shifting) developments, new processes have been implemented e.g. the country-by-country reporting. Furthermore, a special IT tool for transfer pricing documentation is utilized to ensure the timely provision of relevant information.

Comprehensive controls aim to monitor and ensure payment of all taxes owed as well as compliance with applicable tax disclosure obligations under local laws. Efficient collaboration between local tax authorities, our external auditors and our tax advisors is crucial in this respect, and is promoted by HUGO BOSS in a sustainable fashion.

No HUGO BOSS subsidiary is operated in so-called tax havens specifically to avoid taxes, and no profits are shifted to these jurisdictions. All HUGO BOSS Group companies perform active trade or business activities on company premises or serve as holding or leasing entity. This also applies for our subsidiaries in countries such as Switzerland (canton of Zug), Singapore or the Netherlands which could be considered to be low-tax jurisdictions. HUGO BOSS does not use tax structures without economic benefit that allows it to obtain tax benefits. The tax authorities are regularly informed of all the HUGO BOSS Group companies and their respective functions.

III. Tax risk management

HUGO BOSS has to pay tax in many countries as a result of the global nature of its business activities. Local tax laws are often complex and are subject to interpretation by both management and the authorities themselves. Recent international developments have heightened their complexity further. At the same time, companies' compliance with tax regulations and the documentation thereof is subject to increasing public scrutiny. The ambiguity of these developments has meant greater uncertainty for taxpayers.

Effective risk management enables the Group to identify such uncertainties and the resulting risks at an early stage and to mitigate any potential adverse consequences by implementing suitable measures. This includes financial risks in the form of interest on tax payments, fines or penalties, as well as damage to the reputation of HUGO BOSS or a lasting deterioration in its relationship with the authorities. It also refers to the loss of production advantages or export advantages as potential risks. The objective of HUGO BOSS is to minimize tax-related risks by means of appropriate mitigation measures as far as possible. More detailed information on the HUGO BOSS Group's risk and opportunities policy is provided in the "Report on Risks and Opportunities" section of the Annual Report 2023.[2]

The Group Tax Department is in constant contact with all business units (risk owners) so that it is always informed about the latest developments which could have potential tax implications. As part of its corporate governance, the ethically correct payment of corporate taxes also plays an important role for us in our global economic and social relationships. It is therefore ensured that in addition to internal stakeholders, the expectations of external stakeholders on tax matters is also taken into account. All relevant facts are analyzed and assessed together with Group Risk Management. Tax-related issues that present potential tax risks are reported to the Managing Board and the Supervisory Board's Audit Committee to ensure effective risk management.

[2]The Report on Risks and Opportunities 2024 can be viewed at: https://annualreport-2024.hugoboss.com/management-report/report-on-risks-and-opportunities/risk-and-opportunity-management-system.html

To avoid tax risks and minimize their financial consequences, the aim is to reduce the number of fiscal years not yet definitively audited by the tax authorities, where possible through prompt tax audits. The risk mitigation strategy also involves continuous review of tax risks as part of the quarterly reporting process and monitoring of tax risks and opportunities. To establish legal certainty about our own legal position with regard to matters of material significance, we seek to obtain binding rulings from financial authorities where necessary and legally possible as well as second opinions from external advisors. Last but not least, we prevent tax risks from occurring and minimize their effects by submitting tax declarations and returns on time.

IV. Tax function responsibilities and governance

In the case of the HUGO BOSS Group, meeting tax obligations involves the close collaboration of the Group Tax Department and CFO as well as the responsible officers of the Group companies. The CFO, SVP Group Finance & Tax and the Head of Group Tax maintain a constant exchange on current issues, tax positions and projects. The Group Managing Board is also provided with regular comprehensive updates on current tax positions and issues, at least at the time of the half-year and annual report, and as part of the risk management and compliance reporting process. The Supervisory Board, and in particular its Audit Committee, receive quarterly reports on any material tax positions and tax risks.

Within the Group Tax Department, there is regular communication on current topics and the optimization of processes and business transactions, including regular reports on recent, relevant legal developments and training events visited. In addition, the HUGO BOSS Group Tax Department periodically publishes Group-wide information about recent, tax-related legal developments aimed at the target audience.

The Group Tax Department is staffed by specialists in the areas of corporate income tax, value added tax, international tax, tax accounting, transfer pricing and employment tax. All are highly qualified and specialized in their respective domains, enabling them to master the inherent complexity of this area of expertise. By attending ongoing and specific internal and external training events they continuously develop their skills and awareness of current developments.

The HUGO BOSS Group Tax Department sees itself as a business partner to the Group companies based outside Germany, and provides them with support. This allows it to analyze the measures required from a tax perspective together with the Group companies – where appropriate by utilizing the expertise of local tax specialists. In the event of changes in the law or impending restructuring measures, the HUGO BOSS Group also has access to local tax experts, always in close coordination with the Group Tax Department.

V. Relationship with government and tax authorities

HUGO BOSS cooperates intensively with public institutions and local financial authorities with the aim of fostering an enduring, open and constructive approach to discussing tax matters. This requires a responsible and practical interpretation of the applicable laws. As a matter of course, HUGO BOSS reserves the right to defend its legal positions, if necessary, with recourse to the courts.

HUGO BOSS respects every government's right to define its own taxation law and the implementation thereof. HUGO BOSS also believes in fostering cooperative relationships with tax authorities based on mutual trust and respect, reliability and professionalism. That is the commitment we make, irrespective of any discussions with the tax authorities that may arise from the interpretation of applicable legal provisions.

In order to avoid friction in our dealings with financial authorities and to meet legally prescribed deadlines, we review all correspondence in terms of its completeness and factual accuracy without delay.

The Managing Board
HUGO BOSS AG