Tax transparency report 2023

> ***To build a net zero energy future with electricity and innovative solutions and services, to help save the planet and drive wellbeing and economic development.***

Since 2020, the EDF Group, the world leader in energy, has had a "*raison d'être*" that meets ambitious objectives: achieving carbon neutrality, combating climate change, preserving natural resources, promoting well-being and solidarity, and fostering responsible development. Faced with the urgency of climate change, the Group is resolutely committed to playing a key role in the energy transition

Xavier Girre
Group Senior Executive Vice President

In charge of the Performance, Impact, Investment and Finance Directorate

In this context, the EDF Group is a partner in Europe's ambitions for carbon neutrality by 2050. The stakes are high, since the aim is to at least double the share of electricity in the European energy mix.

In this new electricity system that is taking shape, EDF will keep its promise to provide customers with the carbon-free electricity they need, when they need it, thanks to its presence in all electricity businesses.

Les The EDF Group's Corporate Social Responsibility (CSR) commitments have gradually become inseparable from its performance. Business ethics, transparency and tax compliance are important links in this.

Since 2017, the EDF Group has had a Group Tax and Customs Policy that applies to all its entities and employees and publishes, each year, the corporation tax paid in a number of States in which it is present.

As an extension of these practices, we have decided to publish a tax transparency report detailing in particular these guiding principles, the practical applications of our tax policy and the Group's tax contribution in the many countries in which it operates.

1 THE GROUP, OUR ACTIVITIES AND OUR CHALLENGES

1.1. OUR ACTIVITIES

In order to provide its customers with a complete and optimised experience, the EDF Group is involved both upstream and downstream of any energy offer.

As a major player in the energy transition, the EDF Group is an integrated energy company, active across the entire electricity value chain: generation, transmission, distribution, trading, energy sales and energy services.

Electricity generation

The EDF Group builds and operates secure, affordable, carbon-free electricity generation facilities, including nuclear, hydro, wind and photovoltaic power stations.

Transmission and distribution

The transmission and distribution networks make it possible to deliver electricity to end customers, ensuring a balance between supply and demand.

Energy supply

The EDF Group delivers energy and energy services to nearly 40 million customer locations worldwide.

Optimisation and trading

This activity enables the EDF Group to meet the energy supply commitments it has made to its customers, by making trade-offs between available resources.

The EDF Group is present on 5 continents

[1] *Map of EDF Group locations as at 31/12/2023 – Source: EDF Universal Registration Document 2023*

The EDF Group is supporting the energy transition worldwide by developing **low-carbon solutions** in new growing geographic areas while consolidating its historic positions.

1.2. OUR KEY FIGURES FOR 2023

KEY FIGURES
2023

Sales
€139.7 Bn

EBITDA
€39.9 Bn

Net income excluding non-recurring items
€18.5 Bn

Sharing added value with our stakeholders

Suppliers
Purchases
€10.5 Bn

State and territories
Taxes
€7.6 Bn

Employees
Remuneration
€15.5 Bn

40.9 M
Customers worldwide

179,550
Employees worldwide

467.6 TWh
Electricity generated is 93% carbon-free

€706 M
Research and development budget

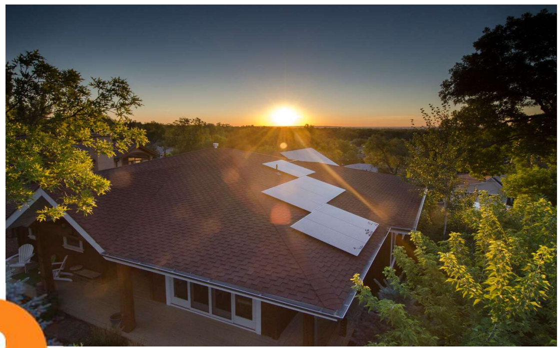
€9.8 Bn
Profit before tax

1.3. OUR CHALLENGES

In June 2024, the EDF Group resolutely strengthened its commitment by defining its new " Ambitions 2035 " project, which meets its performance development and energy improvement objectives based on 4 cornerstones:

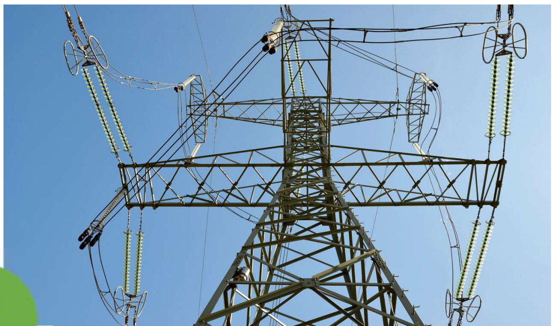
1

Helping customers reduce their carbon footprint:
Through appropriate commercial offers, carbon-free usage and self-consumption



2

Producing more low-carbon electricity:
By developing nuclear and renewable energies

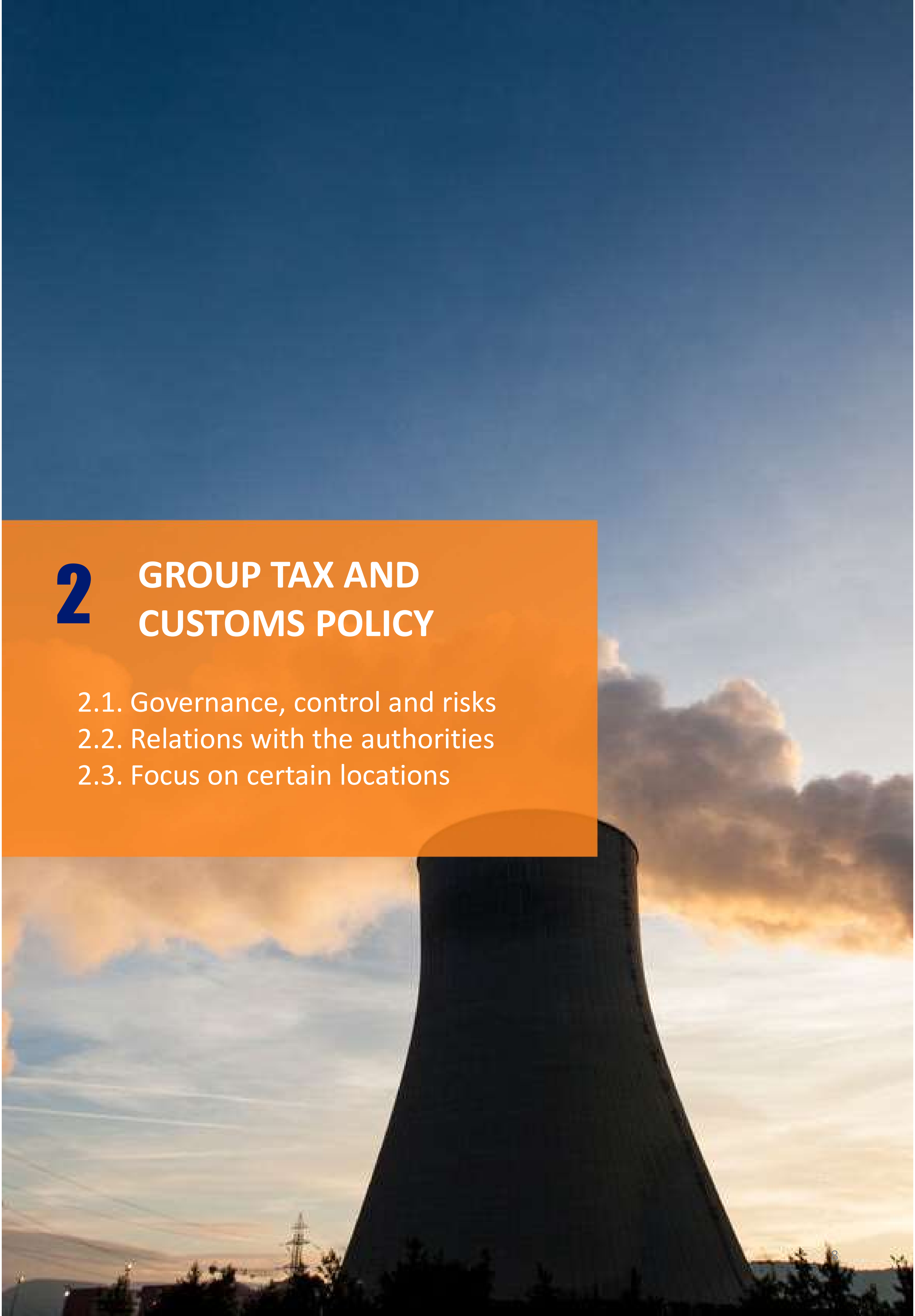


3

Developing networks to meet the challenges of the energy transition:
Through major investments to develop and secure networks

4

Developing flexible solutions to meet the needs of the electricity system:
In particular, by developing the carbon-free operation of flexible thermal generation resources, deploying managed, controllable recharging stations for electric vehicles and B2C load shedding contracts



2 GROUP TAX AND CUSTOMS POLICY

2.1. GOVERNANCE, CONTROL AND RISKS

In drawing up its report, the Group complies with the standards defined by the Global Reporting Initiative (GRI) specific to taxation. A cross-reference table is presented in the appendix to the report (GRI-207).

Tax and customs governance

The EDF Group has a tax and customs department organised around:

- a Group Tax and Customs Division integrated into the Performance, Impact, Investments and Finance Directorate;
- tax and customs teams within the main operational directorates of EDF SA, and its subsidiaries in France and in most of the countries where the Group operates.

Skills management is a priority, with a particular focus on training, the development of expertise and career management. Internal mobility is encouraged, enabling tax specialists to strengthen their expertise, diversify their experience and acquire new skills within the Group's different entities.

The tax and customs department is made up of around one hundred professionals, the vast majority of whom - almost 80 people - are based in France. The other tax specialists are spread around the world, mainly in the United Kingdom, Italy, the United States, Belgium and Brazil.

The importance given to tax governance within the Group is reflected in particular by the fact that tax and customs activities are now part of the Performance, Impact, Investment and Finance Directorate.

Furthermore, the Group Tax and Customs Division reports regularly to the Group Executive Committee. It ensures that major projects and investments, validated by the members of the Group Commitments Committee, systematically benefit from tax expertise.

The Group's Tax and Customs Division draws up the general guidelines that make up the Tax and Customs Policy, one of the Group's 17 policies, which is overseen by the Group's Director of Finance and Impact, a member of the Executive Committee.

The Tax and Customs Division is also responsible for deploying and ensuring compliance with this policy. To achieve this, it relies on a network of local tax specialists and tax correspondents and/or the finance manager.

This organisation is thus based on the responsibility for tax matters of tax directors, tax managers or finance managers of the operational directorates of EDF SA and its subsidiaries. It makes it possible to cover all the Group's tax issues, providing support and security for the business and, more specifically, for each project.

Tax policy

The Tax and Customs Policy aims to protect and promote the Group's financial interests in accordance with its rules and ethics. It is part of EDF's strategy to create value for employees and shareholders, in line with its reputation and image, and in compliance with its commitments to corporate social responsibility (CSR).

The Tax Policy is applied consistently across all Group entities, both in France and in the countries where the Group operates. EDF communicates about its Tax Policy to ensure transparency and strengthen the trust of its stakeholders. This transparency is essential to demonstrate the Group's commitment to acting responsibly and ethically in all the territories in which it operates.

This vision consists of pursuing the following orientations at all times and in all Group entities:

- strengthening the Group's tax and customs performance in strict compliance with national and international tax and customs laws and regulations;
- continuously and systematically improving tax risk management;
- implementing the actions required for effective forward-looking tax cash management, as well as careful and proactive management of the Group's effective tax rate;
- guaranteeing the conditions necessary for the development of constructive relations with the tax and customs authorities and with any other authorities or public bodies, by maintaining transparent and professional exchanges with them.

2.1. GOVERNANCE, CONTROL AND RISKS

Tax ethics

The EDF Group's Tax and Customs Policy prohibits any form of tax fraud or evasion. In this context, the Group adopts a clearly defined policy on setting up operations in "tax havens", prohibiting any operations in Non-Cooperative States and Territories (NCSTs), unless it can be shown that the operation is necessary and has no tax purpose. Indeed, any presence in these territories must be justified by operational reasons and be part of a framework of clear and transparent objectives.
These exceptions must be based on proven economic needs and comply with local laws and regulations. This means that any purely artificial operation aimed solely at obtaining tax advantages is strictly prohibited.

Accordingly, the main intra-group transactions are directly related to the operating activities of our companies, such as the sale and purchase of electricity and gas, trading in nuclear fuels, and engineering and research and development services. They also include traditional flows necessary for the development of the business, such as financing, service provision and trademark licences.

In addition, Tax and Customs Policy is aligned with the Group's commercial and industrial strategy.

In its relations with its financial and commercial partners, EDF undertakes to:

- never assist or encourage them to contravene tax and customs laws or regulations;
- not to facilitate or support operations whose effectiveness depends on withholding information from tax or customs authorities;
- never offer or take part in operations with a primarily tax-related purpose.

More generally, the EDF Group may inform its customers and employees about current tax regulations but refrains from providing tax advice.

Poutès dam, Haute Loire, France

2.1. GOVERNANCE, CONTROL AND RISKS

Tax compliance

In an environment marked by constant changes in tax regulations, the EDF Group is committed to guaranteeing the compliance of its operations and to respecting all tax and customs obligations in all countries where the Group operates.

To ensure this compliance, the Group anticipates the implementation of new regulations by setting up dedicated working groups.
By way of illustration, the OECD's "Pillar 2" work on the introduction of a worldwide minimum tax rate of 15% has been monitored by a dedicated team in order to anticipate the impact on the Group and ensure that it complies with the relevant deadlines (see section 3.4. of this report).

Similarly, EDF is preparing for the widespread introduction of electronic invoicing in France, scheduled for 2026, by organising a cross-functional project involving tax, accounting and information systems management skills.

Particular attention is paid to draft finance bills and, more generally, to all tax and regulatory changes likely to apply in the main countries where the Group operates. The Group actively participates in conferences and committees with other companies, enabling it to share experiences and deepen its collective understanding of new tax provisions. EDF also makes every effort to maintain a relationship of trust with French and foreign tax authorities, based on transparency and constructive dialogue.

This vigilance and rigour in terms of compliance enables EDF to assume its fiscal responsibility by paying the amounts of taxes and levies required in each country, within the legal deadlines.

The tax compliance principles covered by EDF's Tax and Customs Policy also apply to transfer pricing, i.e. the prices charged between Group companies in cross-border operations. The Group therefore undertakes to ensure that the allocation of operating margins between Group companies located in different countries accurately reflects the economic reality of the location of its activities. This sharing of margins is determined in strict compliance with the arm's length principle, in accordance with the principles of the Organisation for Economic Co-operation and Development (OECD).

To ensure compliance with international regulations and secure its tax positions, the Group may also use Advance Pricing Agreements (APAs). These agreements enable the transfer pricing determination methodology to be validated in advance with the tax authorities, thereby avoiding the risk of future disputes.

Compliance with standards is accompanied by rigorous documentation of intra-Group transactions, which are also subject to regular audits by local tax authorities. In accordance with tax regulations, the Group complies with its transfer pricing documentation obligations, in particular in France, through:

- a "*Master file*", which each year provides a detailed overview of the Group's worldwide activities, its transfer pricing policy and the breakdown of income and taxes;
- "*local files*" and simplified transfer pricing declarations, prepared each year, which present a detailed analysis of intra-group transactions, including market price comparables and the justification for the prices applied;
- CbCR (Country-by-Country Reporting), filed each year with the French tax authorities, which mainly details the worldwide breakdown of intra-group and third-party income, profit before tax, tax due and paid, and headcount for each country in which the Group operates (see section 3.4. of the report).

2.1. GOVERNANCE, CONTROL AND RISKS

Risk management

The EDF Group manages tax risk like any other risk. It is identified through a process of control and review of tax activities, including the validation of accounts. The tax managers in each area systematically examine all potential tax issues. The Group's tax practices and related procedures may be subject to internal and external audits (statutory auditors, tax authorities, Cour des Comptes).

The internal control system guarantees compliance with the directives and instructions issued by the Group, while ensuring compliance with laws and regulations, in a complex environment marked by constant changes in national and international tax legislation.
It also aims to ensure that internal processes operate smoothly, so as to guarantee the reliability of financial information.

Given the Group's decentralised organisation, the risks of non-compliance are identified by the finance or tax directors responsible for each Business Unit (BU) or subsidiary. If a risk is identified, it is their responsibility to implement short- or medium-term action plans to eliminate any risk and also to restore compliance, if necessary using external advice depending on the complexity and urgency of the matter. These risks may include in particular reporting problems (such as late filings, omissions or inaccuracies) or misinterpretation of tax legislation.

This internal control system makes it possible to cover all the Group's operations and scope.

The EDF Group has introduced a code of conduct called "*Ethics and Compliance*", which is the first cornerstone of its anti-corruption system. This code applies to all Group employees. The subsidiaries controlled by EDF apply this code within their respective entities, taking into account their specific characteristics and the legislation in force in the countries where they operate.

In addition, a whistleblowing system is available to all employees, as well as to external and occasional collaborators of the EDF Group. This mechanism enables all offences, including tax offences, to be reported through the company's internal channels. Tax compliance is an integral part of the ethical and responsible management of the company.

2.2. RELATIONS WITH THE AUTHORITIES

As part of its commitment to fiscal transparency, the EDF Group undertakes to maintain constructive relations with the authorities of all the countries in which it operates. This commitment translates into fluid communication and active cooperation, so that the Group can ensure that its practices comply with current regulations.

Relationship of trust

In the countries where the Group operates, EDF encourages taxpayers **to sign up to the exchange and trust programmes** offered to them by the tax authorities. EDF favours transparent and proactive exchanges with the tax authorities whenever possible. In the United Kingdom, for example, the Group has a dedicated contact to facilitate communication with respectively the customs and tax authorities.
For example, in 2022, the Group signed up to a programme in Italy, the "Cooperative Compliance Program", aimed at promoting closer cooperation between the Italian tax authorities and taxpayers to prevent tax disputes

In addition, the Group wishes to step up its exchanges with the French tax authorities via the tax partnership mechanism. By undertaking to be transparent and to provide accurate answers to the authorities, companies receive personalised support and clarification of the applicable tax regulations. The aim is thus to secure the tax treatment of the EDF Group's activities in order to prevent disputes and ensure better tax compliance.

Generally speaking, the EDF Group favours measures designed to strengthen the **tax security** of its operations and to remove potential uncertainties in particular related to the interpretation by the tax authorities of tax laws after they have been adopted by the legislator.

Rulings and Advance Pricing Agreements (APAs)

In order to secure its tax positions, the Group uses all the measures offered by the regulations:

- Tax rulings: the Group submits requests to the tax authorities to **clarify the interpretation of tax laws**, given their complexity and the importance of applying them to its operations;
- APAs: to secure its transfer pricing policy for cross-border intra-group transactions, the Group signs agreements with the authorities of the countries concerned so that they agree in advance on the prices to be charged by the Group between its entities for future financial years. Thus, most electricity sales and purchases between EDF SA and its UK subsidiary Trading have been the subject of an agreement between the tax authorities of the two countries for more than 15 years now.

2.2. RELATIONS WITH THE AUTHORITIES

Diverse participations

The EDF Group fully assumes its role as a responsible taxpayer and cooperates fully in all exchanges with the tax authorities concerning the development or practical implementation of tax laws and doctrine. Accordingly, this may involve responding to requests from the public authorities and **taking part in exchanges with the tax authorities on draft regulations.**

The Group participates in public consultations on draft new national or international regulations, as well as on tax administration doctrine (Bulletin Officiel des Finances Publiques in France).

EDF also participates in various working groups set up by the French tax authorities, such as the one involving large companies, which is working on the project to introduce electronic invoicing across the board.

Whenever possible, the Group also applies to test the authorities' new tools. In France, for example, EDF is involved in piloting the electronic invoicing reform project and is a member of the working group on the new customs declaration information system.

Lazer floating solar power plant, Provence Alpes Côte d'Azur, France

Tax disputes

In order to maintain good relations with the tax authorities, the Group always favours discussion and **amicable resolutions** to avoid tax disputes wherever possible. This approach is reflected in transparency and constructive exchanges during audits, then preferential use of all pre-litigation dispute resolution mechanisms with the tax authorities.

Nevertheless, given the constant changes and increasing complexity of tax regulations, certain interpretations may be a source of uncertainty.

When the Group and the tax authorities are unable to reach agreement on issues that have a significant impact on the Group, it may have to challenge certain positions before the competent courts in order to defend its interpretation of the tax regulations.

Tax disputes with significant implications for the Group are detailed in the Universal Registration Document_2023 (see URD 2023 – Section 17.3.1 « *Tax audits* »).

2.3. FOCUS ON CERTAIN LOCATIONS

Non-Cooperative States and Territories (NCSTs), commonly known as “tax havens”, are jurisdictions that do not comply with international standards in terms of transparency, cooperation, exchange of information and the fight against tax evasion.

As part of its tax policy, the EDF Group strictly prohibits any establishment in these territories unless it can demonstrate the operational necessity of the establishment and the absence of a tax purpose.

This prohibition applies equally to the countries included in:

- the official French list of NCSTs, comprising 13 States and territories in 2023*;
- those included in the European Union (EU) list of non-cooperative tax jurisdictions, also known as the “*Blacklist*”, comprising 16 States and territories in 2023**.

In addition, the EU has drawn up a grey list of countries*** which, despite the commitments made to reform their tax policies, do not yet fully meet the required transparency and information exchange criteria.

In accordance with its tax policy, the Group undertakes to:

- prohibit any establishment in the States on these lists (NCSTs, grey list and blacklist) other than for operational reasons;
- and refrain from any operation or financial flow with these jurisdictions.

This policy reflects the Group's commitment to imposing on itself tax conduct that is responsible and complies with its principles, avoiding any involvement in practices that may be perceived as facilitating tax evasion or optimisation. The EDF Group is thus committed to conducting its business activities with integrity, contributing fairly to the fiscal resources of the countries in which it operates. These tax ethics are an essential cornerstone of its corporate responsibility and its commitment to all its stakeholders.

Nam Theun 2 hydroelectric power station, Laos

* The French list in 2023 included the following States: Anguilla, British Virgin Islands, Seychelles, Panama, Vanuatu, Fiji, Guam, US Virgin Islands, Palau, American Samoa, Samoa, Trinidad and Tobago.
** The EU’s blacklist in 2023 included the following States: Anguilla, American Samoa, Bahamas, Fiji, Guam, Palau, Panama, Samoa, Trinidad and Tobago, Turks and Caicos Islands, US Virgin Islands, Vanuatu.
*** The EU's grey list in 2023 included the following States: Armenia, Eswatini, Turkey, Barbados, Botswana, Dominica, Seychelles, Costa Rica, Hong Kong, Malaysia, Qatar, Uruguay, Jamaica, Jordan, North Macedonia, Russia, Belize, British Virgin Islands, Israel, Montserrat, Thailand and Vietnam.

2.3. FOCUS ON CERTAIN LOCATIONS

As part of its commitment to **tax transparency**, the EDF Group presents below its locations in the jurisdictions which:

- either do not fully comply with international requirements on transparency and the exchange of information between authorities (EU grey list);
- or have introduced a low rate of corporation tax (below 15%).

Ireland

> 10
Entities

€5 M
Pprofit before tax

€0.2 M
Tax paid

21
Employees

4 %
ETR*

The Group mainly has a captive insurance company there, based in Dublin, which participates in the majority of the Group's insurance programmes.

EDF is also present in the country to develop offshore wind farms and solar farms.

Luxembourg

5
Entities

€82 M
Profit before tax

€1 M
Tax paid

1
Employee

1 %
ETR

The Group mainly holds two reinsurance captives there: one essentially covers EDF SA's nuclear civil liability risk and the second reinsures Framatome.

Vietnam

2
Entities

€17 M
Profit before tax

€1 M
Tax paid

> 110
Employees

4 %
ETR

The Group has a stake in the company that owns and operates the Phu My 2.2 combined cycle gas turbine (CCGT) plant, which has a capacity of 715 MW.

Since 2021, EDF has also been developing a rooftop solar panel business there

Singapore

5
Entities

€91 M
Profit before tax

€6.3 M
Tax paid

3
Employees

7 %
ETR

The Group is mainly established there through its joint venture with the Japanese group Jera to carry out trading transactions on the Asian markets.

* Simplified ETR: corresponds to the ratio of tax paid to profit before tax

2.3. FOCUS ON CERTAIN LOCATIONS

United Arab Emirates

> 5
Entities

- €11 M
Profit before tax

€ -
Tax paid

> 460
Employees

0 %
ETR

The Group is present in the country through its stake in an entity responsible for the operation and maintenance of large cooling production facilities in the Middle East.

EDF also provides project management assistance services to local electricity companies.

Finally, the Group has also recently inaugurated a photovoltaic power station there.

Qatar

2
Entities

> €0.01 M
Profits before tax

< €0.1 M*
Tax paid

> 125
Employees

1064 %
ETR

The Group has a stake in an entity responsible for the operation and maintenance of large cooling production facilities in the Middle East.

EDF also provides project management assistance services to local electricity companies.

Bahraïn

2
Entities

> €0.2 M
Profit before tax

€ -
Tax paid

> 60
Employees

0 %
ETR

The Group has a subsidiary responsible for the operation and maintenance of large cooling production facilities in the Middle East.

EDF also provides project management assistance services to local electricity companies.

* Tax paid on the EDF Group's profitable activities in Qatar.

3 GROUP TAX CONTRIBUTION IN 2023

3.1. GLOBAL TAX CONTRIBUTION

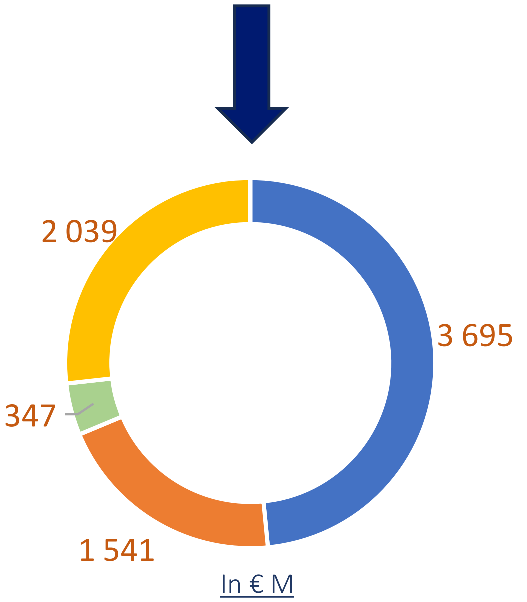
As a responsible electricity operator and supplier, the EDF Group is taking its place as a major player in the **ecological transition** and energy sovereignty. As such, it is committed to contributing to the development of the areas in which it operates, both in terms of local employment, local purchases, the creation of economic value and also through its **tax contribution.**

The EDF Group's worldwide contribution includes **taxes definitively borne** by EDF:

- income tax, which is paid in all countries where the Group's activities generate profits;
- taxes specific to the energy sector, such as taxes on basic nuclear facilities (INB), flat-rate taxes on production facilities (IFER), etc. ...;
- taxes on remuneration paid to its employees;
- other taxes, such as the territorial economic contribution (contribution économique territoriale or CET) and property taxes.

€7.6 Bn*

in taxes paid by the Group in 2023



* Contrary to the URD data, this amount:

- does not take into account taxes on Brazilian goods and services rebilled to customers and the tax on surplus profits paid in Belgium in 2024
- and takes account of basic nuclear facility additional taxes paid by EDF SA and recognised as fixed assets under IFRS

- Income tax
- Taxes on means of energy production
- Taxes on remuneration
- Other taxes

The Group's global tax contribution paid in 2023 amounts to **€7,622 M**, including:

€3,695 M in income tax compared with € 1,282 M in 2022.

€3,927 M in other taxes, up by € 901 M compared with 2022.

In addition, the Group collects very large amounts of taxes on behalf of States or other bodies (amount deducted directly from payments of consumers' electricity bills).

The Group's effective tax rate (ETR) is 25.13% in 2023, i.e. a rate slightly lower than the theoretical French tax rate of 25.82% (for further explanations, see URD 2023 – Note 9 « Income taxes »).

Since 2016, the Group has been subject to tax CbcR. As from the 2024 financial year, the Group will be required to publish its CbCR by 31 December 2026. As part of this 2023 tax transparency report, the Group is anticipating this obligation by publishing its simplified 2023 tax CbcR with its tax data by country.

3.2. TAX CONTRIBUTION IN FRANCE

€127 Bn
Sales

€15 Bn
Profit before tax

> 130,000
Employees

> 500
Companies

France is the country in which the EDF Group has historically operated and therefore receives the largest share of its tax contribution. The Group is deeply rooted in France's economic fabric, with a nationwide presence through more than 1,300 subsidiaries. This strong presence explains why almost 70% of the Group's total sales is generated in France.

EDF is a key player in the French energy landscape, operating one of the largest nuclear generation fleets in the world. At the same time, the Group is investing massively in renewable energies, thus contributing to energy production that is 93% free of direct CO_2 emissions. These efforts support EDF's commitment to the energy transition and the fight against global warming.

The Group plays a key role in supplying energy and services to 29.6 million customers in France. This activity is at the heart of EDF's activities, reflecting its commitment to ensuring a reliable and sustainable distribution of energy across the country.

Given the Group's strong presence in France and its low-carbon production capacity, the Group actively supports national commitments to sustainable development and the energy transition.

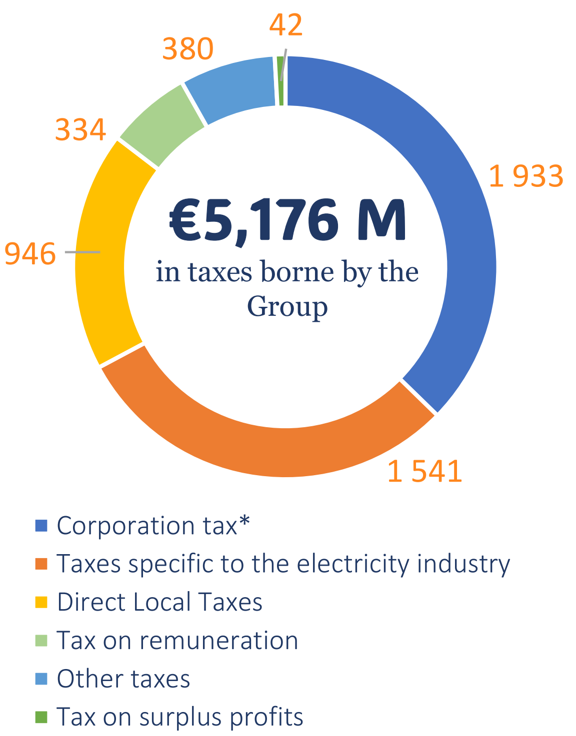
€5.2 Bn
in taxes borne by the Group

€7.4 Bn
in taxes collected by the Group

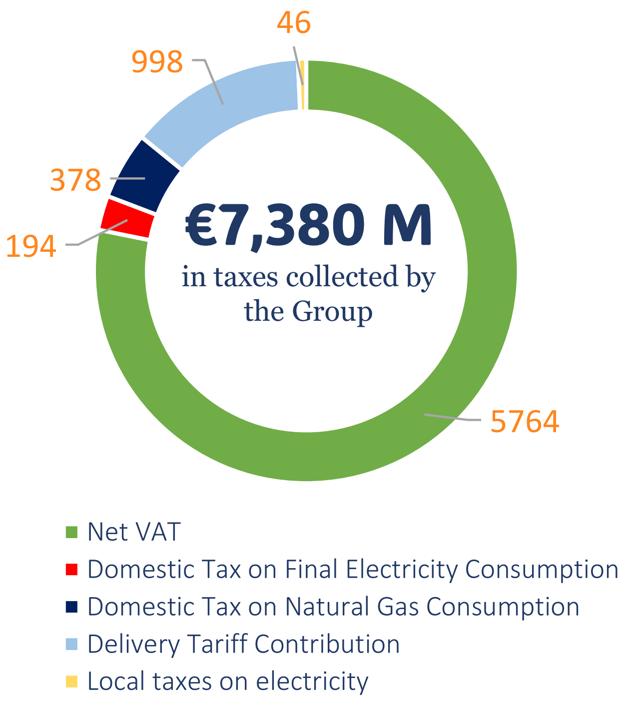
€12.6 Bn
paid to the State and local authorities' Budget

3.2. TAX CONTRIBUTION IN FRANCE

Breakdown of taxes borne on the Group's activities in France by type of tax (in € millions):



Breakdown of taxes collected on the Group's activities in France by type of tax (in € millions):



* Given the loss-making results for 2022, the EDF Group has generated losses carried forward that will reduce its future taxable income subject to corporation tax.

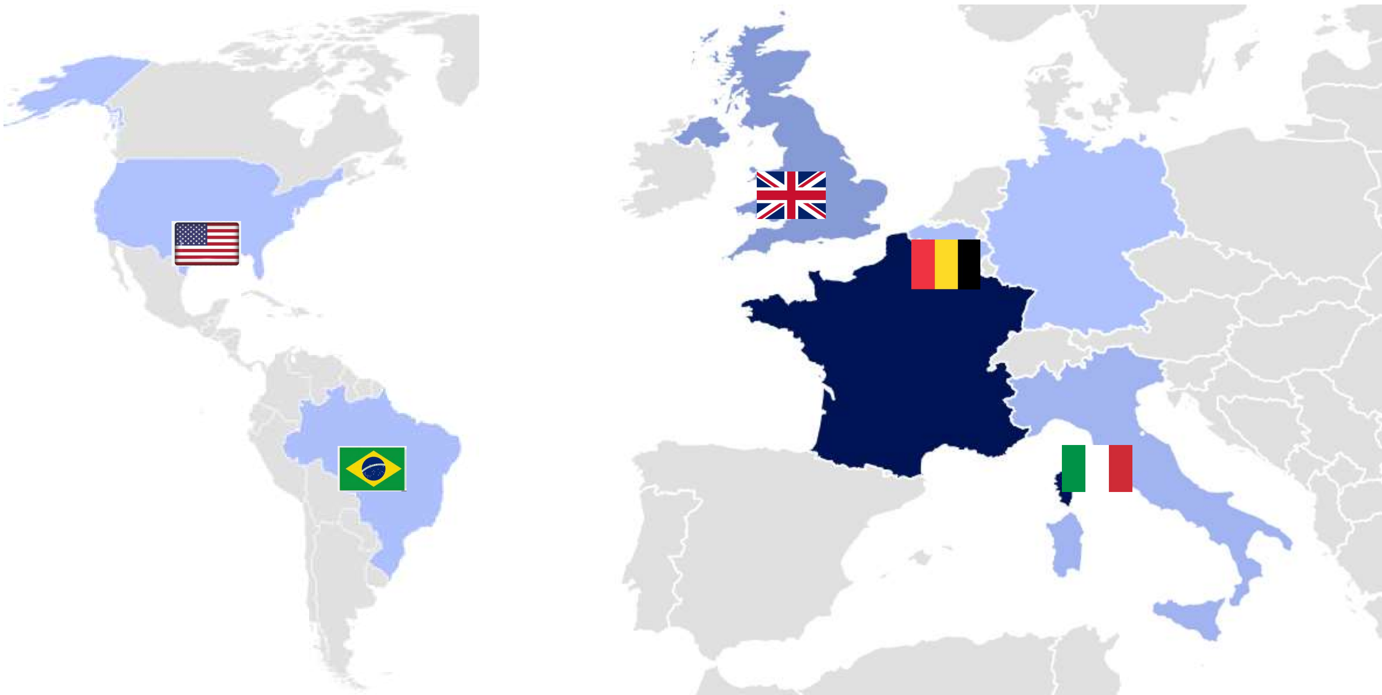
The EDF Group benefits from various **tax incentives** as part of its business activities and its massive investments in France, in particular to support the energy transition. These are essentially the following schemes:

- The **R&D tax credit** ("CIR") which enables companies to reduce their tax by a percentage of the expenditure incurred on research and development (R&D) activities in order to encourage innovation by reducing the cost of R&D. For the 2023 financial year, EDF thus benefited from a research tax credit amounting to €73 M, out of a total of €272 M of R&D expenditure eligible for this scheme;
- In the **French Overseas Departments and Regions** (DROM) where the Group operates, it is possible to benefit from exemptions from social security contributions to encourage investment and local employment, a reduced VAT rate, as well as tax exemption measures for productive or property investments, aimed at stimulating the development of the regional economic fabric.
- For the development of renewable energies, EDF can also benefit from tax exemptions or reductions when locating in **free zones**.

These tax breaks are essential to facilitate and accelerate the investments needed for the energy transition, while contributing to competitiveness and the development of innovation.

3.3. TAX CONTRIBUTION IN OTHER COUNTRIES

The EDF Group is present in 68 countries around the world. Outside France, its main operations are located in the United Kingdom, Italy, the United States, Belgium and Brazil.



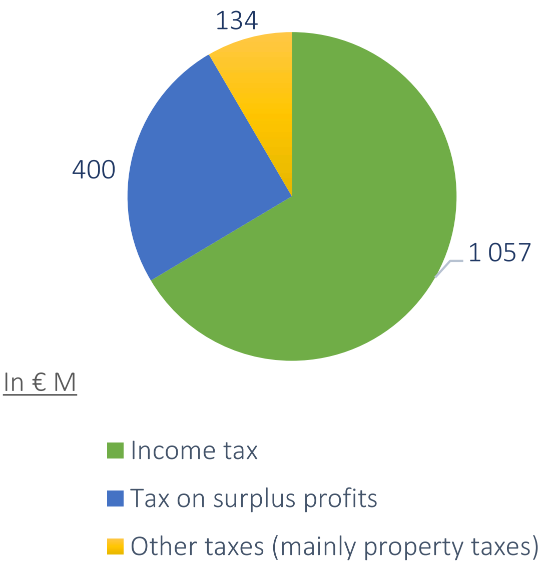
3.3. TAX CONTRIBUTION IN OTHER COUNTRIES

Hinkley Point nuclear power station, United Kingdom

United Kingdom

€1.6 Bn

in taxes borne by the Group*



The EDF Group is a major energy player in the UK, focusing primarily on the generation and supply of electricity. EDF Energy, its UK subsidiary, is one of the country's leading electricity producers, with diversified generation capacity including nuclear energy, renewable energies (notably wind and solar) and gas-fired power stations.

EDF is playing a key role in the UK's energy transition, supporting carbon emission reduction targets and investing in new energy technologies and infrastructure, such as the Hinkley Point C nuclear power station project.

The Group is also involved in supplying electricity and energy services to millions of homes and businesses across the country.

Finally, EDF is also present in the United Kingdom through its subsidiary EDF Trading, which is responsible for acting as the Group's sole interface with the electricity markets.

€36 Bn
Sales

-€7 Bn**
Profit before tax

> 16,000
Employees

> 120
Companies

* Tax paid on the EDF Group's profitable activities in the United Kingdom

** Including a €12.9 Bn impairment of HPC assets and EDF Energy goodwill (See note 10.8 of the notes to the consolidated financial statements at 31/12/2023).

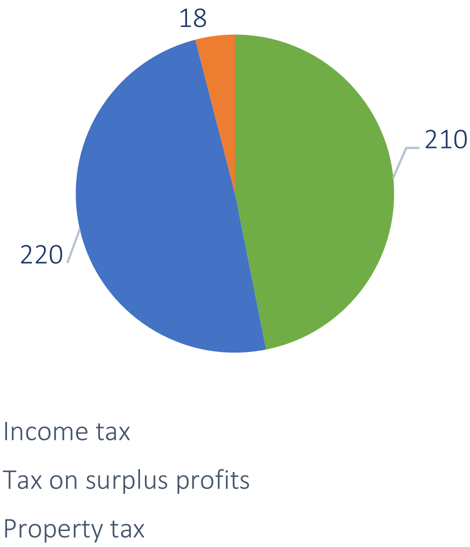
3.3. TAX CONTRIBUTION IN OTHER COUNTRIES

Mistretta wind farm, Sicily

Italy

€448 M

in taxes borne by the Group



In Italy, the EDF Group operates mainly through its subsidiary Edison, a leading energy company with a 140-year history as one of the oldest operators in the sector.

The Group's activities in Italy cover the production, distribution and supply of electricity and gas. EDF has a diversified portfolio in energy production, including thermal and hydroelectric power stations, as well as renewable energy facilities, notably wind and solar power.

Edison also plays a central role in the country's natural gas supply, being one of the main operators on the Italian market.

The Group is committed to the country's energy transition, investing in projects to reduce carbon emissions, promote energy efficiency and develop sustainable mobility solutions, thereby contributing to the decarbonisation of transport in Italy.

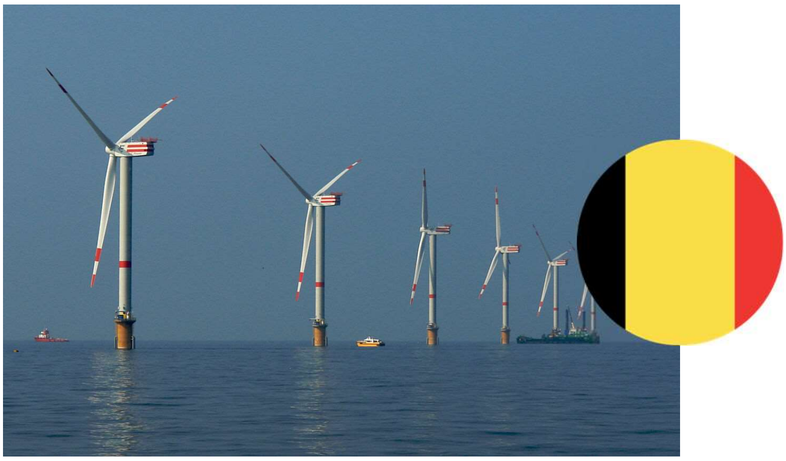
€24 Bn
Sales

€695 M
Profit before tax

> 4,600
Employees

> 50
Companies

3.3. TAX CONTRIBUTION IN OTHER COUNTRIES

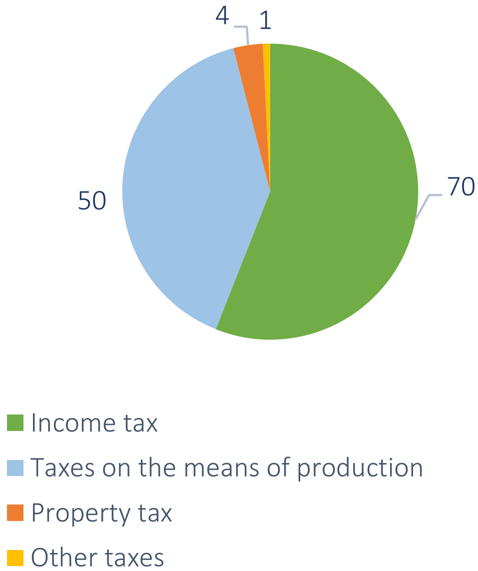


Offshore wind farm, Belgium

Belgium

€125 M*

in taxes borne by the Group



* Excludes €146 M of tax on surplus profits paid in Belgium in 2024.

In Belgium, the EDF Group is mainly active through its subsidiary **Luminus**, which is one of the country's leading electricity producers and suppliers. Luminus operates a diversified energy portfolio, including thermal power stations, wind farms and hydroelectric facilities. Furthermore, it also has a number of stakes in Belgian nuclear facilities.

The subsidiary is also a key player in the development of **renewable energies**, with a strong commitment to wind power and energy optimisation projects.

Indeed, as well as producing energy, Luminus offers innovative energy services for homes and businesses, designed to optimise energy consumption and support Belgium's energy transition.

In addition, the EDF Group, via its subsidiary **EDF Belgium** and as part of a long-standing nuclear cooperation with Electrabel, owns 50% of the Tihange 1 nuclear power station in undivided joint ownership.

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€5 Bn
Sales

€279 M
Profit before tax

> 2,500
Employees

> 65
Companies

3.3. TAX CONTRIBUTION IN OTHER COUNTRIES

Sinop hydroelectric development, Brazil

Brazil

€113 M*

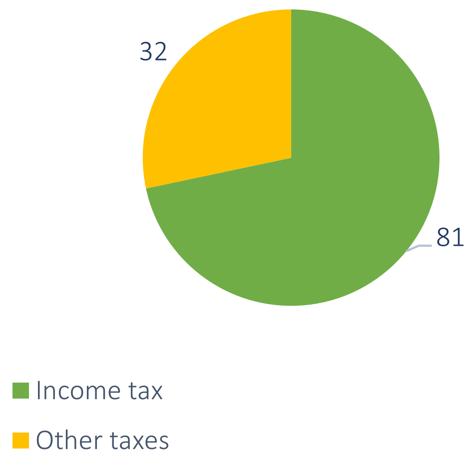
in taxes borne by the Group

Brazil is a strategic market for the international development of the EDF Group, which has been present there for almost 30 years.

It operates the 402 MW Sinop hydroelectric power station there located in the State of Mato Grosso, as well as the Norte Fluminense (827 MW) and Marlim Azul (565 MW) combined cycle gas turbine plants.

It also has more than 1.8 GW of solar and wind power projects in Brazil, particularly in the north-east of the country, a region that is ideal for harnessing renewable energies. These projects are helping to diversify Brazil's energy supply by promoting green energy sources, in line with the country's energy transition objectives.

The Group recently won its first project in the electricity transmission sector and is also developing storage solutions



* Excludes €144 M of taxes on Brazilian goods and services (ICMS) rebilled to customers.

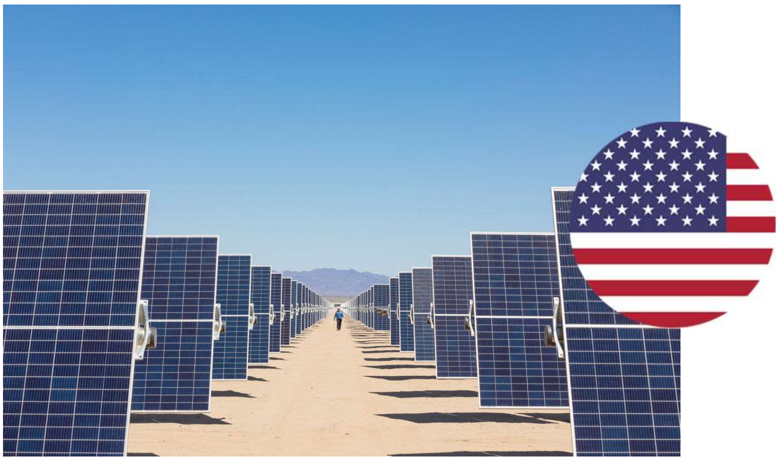
€781 M
Sales

€175 M
Profit before tax

> 250
Employees

> 10
Companies

3.3. TAX CONTRIBUTION IN OTHER COUNTRIES

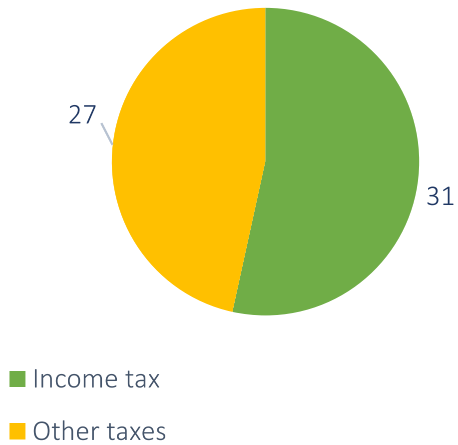


Solar park in California, United States

United States

€58 M

in taxes borne by the Group



The EDF Group operates throughout North America, with a strong presence in the United States.

Firstly, by exploiting **renewable energies** through the development, construction and operation of wind farms (onshore and offshore) and solar farms. These projects are making a major contribution to the United States' energy transition. EDF Renewables is one of the leading producers of renewable energy, with projects in states such as California, Texas and South Dakota.

Secondly, through electricity and gas **trading** by which the Group plays a key role in the energy markets by optimising it while ensuring the reliability of energy supplies.

But also through **energy services**, local energy management, energy efficiency and public lighting.

Finally, through Framatome, the Group is actively involved in the maintenance and supply of fuel for the US **nuclear fleet**, as well as supporting the renewal of licences and the development of new reactors.

€2.5 Bn
Sales

€123 M
Profit before tax

> 3,900
Employees

> 80
Companies

3.3. TAX CONTRIBUTION IN OTHER COUNTRIES

CbCR

(Country-by-Country Reporting)

The information set out below is taken from the EDF Group's CbCR and is used to prepare the Group's consolidated financial statements. These figures are given in € M.

Country	Sales	Profit before tax (+) or loss (-)	Tax paid *	Tangible assets	Number of employees
France	127,171	15,134	1,933	150,153	136,514
United Kingdom	35,986	(6,947)	1,057	16,489	16,378
Italy	24,444	695	428	3,994	4,687
Belgium	5,170	279	70	1,729	2,584
United States	2,446	123	31	5,092	3,967
Germany	2,109	98	29	490	3,059
Brazil	781	175	81	1,120	257
Canada	367	50	13	921	334
Poland	341	6	7	240	791
Vietnam	281	17	1	94	117
Ireland	265	5	0	65	21
Spain	156	9	2	52	851
South Africa	153	11	2	126	207
Luxembourg	141	82	1	0	1
China	100	(47)	1	427	433
Israel	97	(18)	-	522	93
Greece	67	14	5	239	114
India	54	(12)	1	319	164
Saint-Martin	40	27	10	83	66
Japan	32	0	0	3	33
Others	284	(127)	6	457	1,930

* Corresponding to the tax paid, which may differ from the tax charge due to the rules relating to the payments of instalments and tax balance.

PILLAR II

(Worldwide minimum tax)

To address concerns about tax base erosion and the transfer of tax benefits between States in large multinationals, an agreement was entered into in 2021 between more than 135 OECD jurisdictions to introduce a **minimum tax of 15%** per country on the profits made by multinational groups with sales in excess of € 750 million.

The Finance Act for 2024 transposed these international regulations into French law, with their first effective application from the 2024 financial year. The first Pillar II reporting will therefore have to be filed in June 2026 for the 2024 financial year.

Since 2022, the Group has been anticipating the implementation of these new Pillar II regulations. To date, the following **actions** have been carried out:

1

Defining the **scope of Pillar II** by carrying out a preliminary analysis making it possible to identify the entities concerned and those with specific characteristics with regard to these regulations.

2

Implementation of an annual process of **reporting** of the necessary **data** for the entities included in the scope. This process includes reviewing and discussing the data collected, monitoring its consolidation and analysing impacts at Group level, sharing conclusions internally and then with the Board of Statutory Auditors.

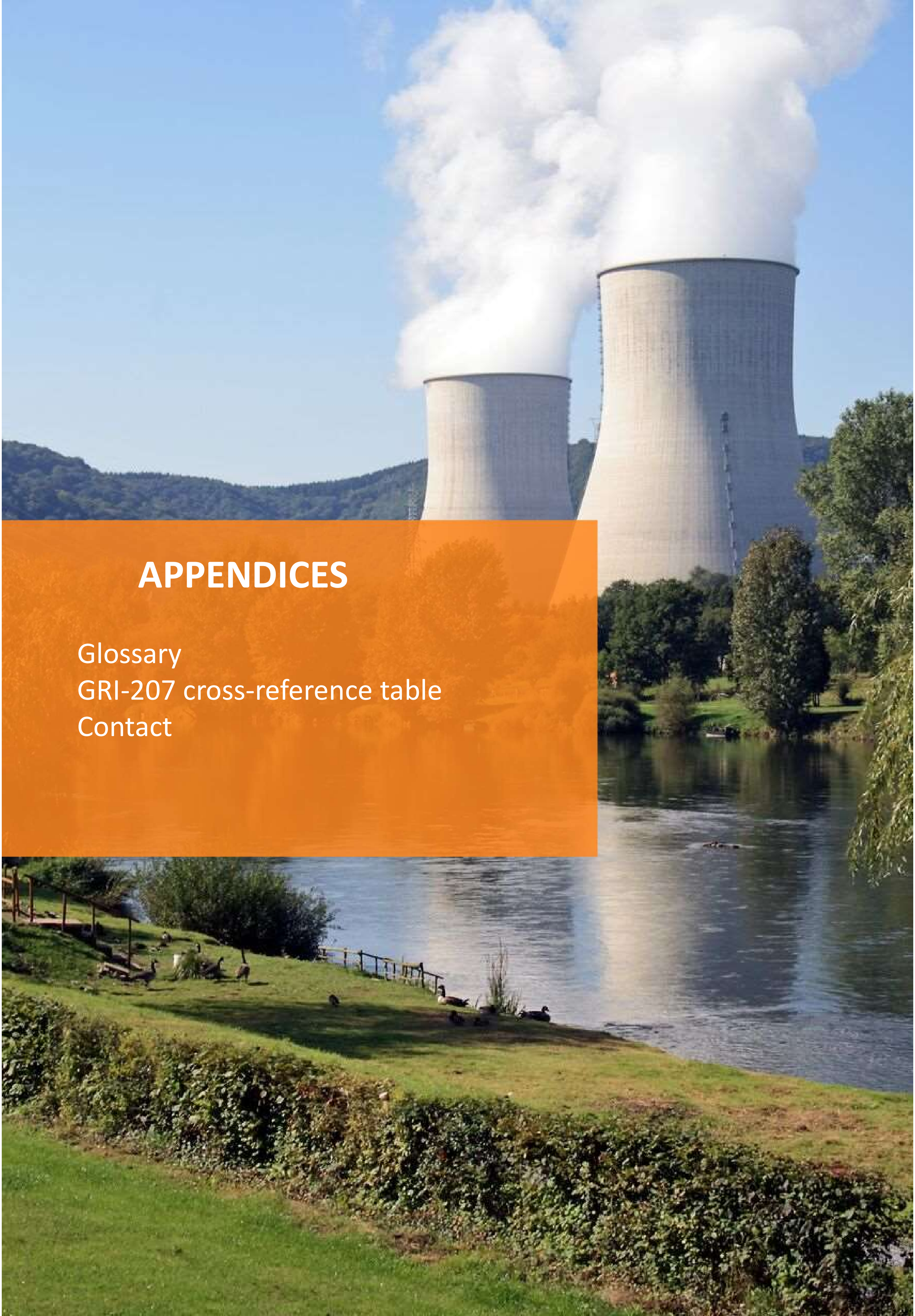
3

Training the entire Group's tax and accounting **teams** involved in these new regulations.

The Group has therefore been able to assess the impact of these regulations for the 2022 and 2023 financial years. As a result, if the regulations had been applicable for these two financial years, Pillar II would not have had a material impact on the Group.

For the 2023 financial year, this would result (excluding the safeguard clause to be retained for the first few years of application) in an additional charge of €22 M mainly coming from:

- Singapore, where certain trading activities not controlled by the Group benefit from a tax rate of less than 15%;
- Luxembourg, due to the presence of a Group reinsurance captive and the treatment associated with provisions for fluctuations in claims.



APPENDICES

Glossary
GRI-207 cross-reference table
Contact

GLOSSARY

Load shedding contract
Load shedding involves asking customers to temporarily reduce their electricity consumption during peaks in consumption. In return, they benefit from advantageous pricing, or even remuneration in certain cases.

Business Unit
Operational entity within a company or group. It generally corresponds to a specific segment of the business.

Employees
A natural person bound to an employer by the conclusion of a contract of employment and by a relationship of permanent subordination.
This does not include subcontractors or external service providers.

EBITDA
Financial indicator that refers to earnings before interest, taxes, depreciation and amortisation. It reflects the increase in an entity's wealth generated by its operating activities, independently of non-operating items.

Tax cash
Cash effect linked to a company's tax obligations. This includes cash flows associated with the payment of income tax, VAT, social security contributions and other taxes that the company must pay to the tax authorities, net of any tax credits or subsidies received.

Tax paid
Taxes actually paid during the financial year.

Sales
The sum of sales of goods, manufactured products, provision of services and income from related activities generated by a company in the course of its business activity.

Effective tax rate
Rate corresponding to the ratio between the total consolidated tax charge under IFRS (current tax and deferred tax) and the consolidated profit before tax, calculated in accordance with IFRS.

Free zones
Geographical areas within a country where companies benefit from tax, customs and regulatory advantages in order to stimulate regional development.

Income tax
Direct tax levied on the profits made by companies during a given tax period. Its purpose is to tax the company's taxable income, i.e. the accounting profit adjusted in accordance with the tax regulations in force. In France, this tax is mainly represented by corporation tax.

Basic Nuclear Facility taxes
The Tax on Basic Nuclear facilities is a specific tax in France that applies to operators of nuclear facilities. This tax is intended to finance the monitoring, control and regulation of nuclear facilities, and to contribute to the costs associated with nuclear safety and radiation protection.

IFER tax
The Flat-Rate Tax on Network Companies (IFER) is a tax designed to ensure that companies operating certain types of equipment and networks contribute to the financing of local authorities. The IFER therefore only applies to companies operating in the energy, rail transport and telecommunications sectors.

Tax on surplus profits
This tax stems from an EU regulation requiring Member States to introduce a measure to capture the inframarginal rents earned by producers above a certain threshold of electricity sales over a given period. This tax has in particular been introduced in France, the UK, Italy and Belgium.

Domestic Tax on Final Electricity Consumption
The excise duty on electricity (“TICFE”) is a tax paid by all final consumers of electricity. It is collected by energy suppliers and paid into the State's general budget.

Domestic Tax on Natural Gas Consumption
The excise duty on natural gas (“TICGN”) is a tax collected by natural gas suppliers from their customers who consume natural gas for fuel purposes. It is paid into the State’s general budget.

Delivery Tariff Contribution
The Delivery Tariff Contribution is a tax collected by electricity suppliers for supply contracts that include delivery. It is paid to the “Caisse Nationale des retraites des Industries Electriques et Gazières” (“CNIEG”).

GRI-207 CROSS-REFERENCE TABLE

The GRI standards (Global Reporting Initiative, an independent body) are international reference standards for the preparation of reports on sustainable development.
In 2019, the GRI introduced a new tax standard: GRI-207. More specifically, GRI 207-Tax provides those who wish to comply voluntarily with the obligations and guidelines relating to tax communication.

For an international group like EDF, complying with these standards improves transparency and helps prevent the risks of tax non-compliance.

GRI 207-1: Approach to tax	Comments
The group must provide a description of its tax policy, indicating in particular: ▪ whether the organisation has a tax strategy and, if so, and provided that the strategy is public, the source from which it can be obtained; ▪ the organisation's governance body or management, which formally reviews and approves the tax strategy; ▪ the policy's approach to regulatory compliance; ▪ the link with the commercial strategy and the sustainable development strategy.	EDF describes the requirements of GRI 207-1 in part 2 "*Group Tax and Customs Policy*" of this report. EDF presents its tax strategy to ensure transparency and strengthen the trust of stakeholders. This transparency is essential to demonstrate the Group's commitment to acting responsibly and ethically in all the territories in which it operates. The Group is committed to ensuring the compliance of its operations and to complying with all tax and customs obligations, whether national or international. To ensure this compliance, the Group anticipates new regulations thanks to a skilled department, active monitoring and participation in various working groups. EDF's Tax and Customs Policy is aligned with its commercial and industrial strategy. Indeed, EDF undertakes to comply with tax and customs laws by not participating in tax optimisation practices or withholding information from its partners. The Group is also actively committed to contributing to the development of territories in which it operates through its tax contribution. This commitment includes promoting low-carbon energies and improving access to energy in developing countries.

GRI 207-2: Tax governance , control and risk management	**Comments**
The group must provide a description of the tax governance and control framework, specifying in particular: ▪ the governance body responsible for compliance with the tax strategy; ▪ integration of the tax policy in the group; ▪ the approach to tax risk management;	Part 2 of this report and in particular that relating to the "*Governance, control and risks*" describes the elements required by the GRI 207-2 standard. The Tax and Customs Director, who reports to the Finance Directorate, reports to the Executive Committee. This Director ensures that the Group's tax policy is implemented and complied with, with the support of the Group's tax specialists. Tax risks are managed like any other risk: they are identified through a process of internal control, review and audits. The Group's decentralised organisation enables finance and tax directors to identify the risks of non-compliance at their level. Once the risk has been identified, all the necessary steps are taken to restore compliance.

GRI-207 CROSS-REFERENCE TABLE

• assessment of compliance as part of governance and control. The group must also provide a description of: • mechanisms for reporting deviations concerning the conduct of business and the Group's fiscal integrity; • the certification process for tax information.	This internal control system ensures compliance with the Group's directives and with laws and regulations, in a complex and constantly changing environment of national and international tax legislation. In addition, the Group has set up a whistleblowing system available to all employees, external collaborators and occasional workers of the Group. This mechanism makes it possible to report any infringements, including those relating to taxation, through the company's internal channels.

GRI 207-3 – Stakeholder engagement and management concerns related to tax	Comments
The group must provide a description of the approach to stakeholder engagement and the management of stakeholder concerns, mentioning in particular: ▪ the approach to engagement with the tax authorities; ▪ the approach to defending public policies with regard to the tax policy.	Part 2 of this report describes in detail the Group's relations with the tax authorities. The report discusses, for example, the various tax partnership agreements and the exchange procedures used by the Group with the tax authorities (rulings, APAs). In addition, the Group regularly participates in working groups with other French groups and the tax authorities on various regulatory projects. The Group may also take part in public consultations.

GRI 207-4 – Country-by-country reporting	Comments
Lastly, the group must provide detailed information such as: taxes paid, income, economic activities, broken down by country (CbCR) as well as the list of entities established in each country.	Part 3 of this report, entitled "Group tax contribution", includes a simplified version of the CbCR report submitted to the tax authorities.

N.B.: No assurance can be given as to the relevance, completeness or accuracy of the information or opinions contained in this report, and EDF's directors shall not be liable for any loss resulting from any use that may be made of this report or its contents.

Unless otherwise indicated, the data presented in this report are for the year 2023. Detailed information is available in the EDF Universal Registration Document (URD) 2023 filed with the Autorité des marchés financiers on 4 April 2024, which can be consulted online on the AMF's internal website at www.amf- france.org or EDF's website at www.edf.fr.

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