

Tax Policy



CALOUSTE GULBENKIAN
FOUNDATION

The Calouste Gulbenkian Foundation is a private institution of public utility with a privileged tax status in the different jurisdictions where it operates, granted in accordance with the statutory purposes it pursues and on the basis of whose outcomes it periodically reports.

The Foundation understands that the payment of taxes is a key aspect of many of the Sustainable Development Goals, with particular emphasis on Goal 10 – Reducing Inequalities, since taxes are an integral part of public policies aimed at redistributing wealth.

The reduction of inequalities is central to the Foundation’s strategy and an integral part of its activity. Accordingly, the Foundation makes a commitment to the United Nations Resolution “Transforming our world: the 2030 Agenda for Sustainable Development (2015)”, which recognises the important contribution of taxes to the achievement of the Sustainable Development Goals.

The Tax Policy and its publication contribute to fulfilling the Gulbenkian Foundation’s commitment to transparency towards all stakeholders in matters that are crucial for sustainable management.

1.

Purpose

The Foundation's Tax Policy aims to ensure the full compliance with all tax duties in every jurisdiction where the Foundation operates, through the payment of taxes, contributions and other levies that may be due, as well as through the fulfilment of all reporting obligations.

As part of said purpose, the Foundation is responsible for adopting an appropriate and prudent interpretation of the legislation in force in relation to the operations carried out, with the support of lawyers and external consultants, and by seeking the opinion of local tax authorities whenever necessary and possible, so as to guarantee full compliance with the applicable regulations.

The Foundation shall build a proactive, sound and close relationship of cooperation with the tax authorities of the various countries where it operates, based on trust and good faith, in order to ensure the provision of the information, documentation and clarifications required for an adequate understanding of the activities carried out in each geography.

2.

Scope

The Foundation's Tax Policy applies to all dimensions of its activities, including its investments and its relations with suppliers, employees and the beneficiaries of its initiatives.

The Tax Policy covers taxes, social security contributions, and other legal charges, such as fees, fines and other payments to public entities.

The Foundation is also responsible for acting in such a way as not to encourage inappropriate tax practices by entities with which it interacts.

3.

General Principles

The Calouste Gulbenkian Foundation interprets its exemption from income tax (with regard to corporate income tax, by order of the Minister of Finance dated 18 July 1989) as an added responsibility in pursuing its mission in the service of society. This responsibility also translates into the scrupulous fulfilment of all tax duties from which it is not exempt.

In this context, the Foundation adopts a stance of rejecting tax evasion practices and aggressive tax planning.

The Foundation's Tax Policy is applied with rigour and professionalism, taking into account the legitimate interests of all stakeholders and in full alignment with its mission.

The Foundation shall therefore:

- Implement the options which, in tax matters, prove most appropriate to its activities, in strict compliance with both the spirit and the letter of the law;
- Defend its legitimate interests through administrative channels and, if necessary, judicially, whenever the payment of any taxes, contributions or levies raises well-founded doubts as to legality;
- Make use of applicable tax benefits and incentives that are appropriate to its activities, on the understanding that such benefits are intended to encourage specific behaviours with a positive impact on society. Thus, the use of tax benefits and incentives, within the spirit in which they were created and insofar as they fall within the scope of the Foundation's mission and activities, is in full alignment with the Foundation's Tax Policy;
- Use applicable tax benefits and incentives with the sole and exclusive purpose of pursuing its statutory aims, as set out in its statutes;
- Create the conditions for individuals and entities engaged with the Foundation to comply with the tax and para-fiscal obligations arising directly from such relationships, namely through the provision of information and/or tax and para-fiscal statements, whether general or individualised, which the Foundation is legally required to provide or which are deemed relevant;
- Promote an environment of tax risk mitigation in its activities.

4.

Best Practices

In applying the general principles set out above, the Foundation shall promote best practices in tax matters.

The Foundation shall not establish or use artificial vehicles created solely for the purpose of reducing or exempting the payment of taxes. Equally prohibited are structures designed to transfer results to low-tax jurisdictions, as well as the creation of structures intended to obscure financial and accounting movements and their tax consequences.

The Foundation shall not participate in, promote or facilitate operations lacking economic substance; such operations must be based on assumptions and values that fully adhere to the factual reality on which they are projected.

The Foundation shall not establish or acquire companies in tax havens, in accordance with the list of non-cooperative jurisdictions defined by the European Union.

The Foundation shall not conceal a taxable event by reclassifying or converting it into another fact that is exempt or subject to lower taxation.

In the context of a pre-litigation tax matter, where the Foundation has solid grounds to support its position, based on the law in force, the consistent case law of higher courts or established legal doctrine, priority shall be given to seeking resolution through administrative channels, within a framework of good faith and cooperation with the Tax Authorities.

Where resolution by this means proves impossible, leading to an actual litigation scenario, the matter shall be submitted by the Foundation to the competent jurisdiction.

5.

Governance, Control and Audit

The present Tax Policy, the approval and periodic review of which fall within the remit of the Board of Trustees, contributes to mitigating risks of legal non-compliance as well as the reputational risks associated with it.

The primary responsibility for verifying the strict compliance with the Foundation's Tax Policy lies with the Board of Trustees, which delegates to the Executive Board such decisions as may, at any given time, prove necessary and appropriate to the spirit of the policy.

The Foundation's internal control system is based on the three lines of defence model. The first line of defence is the responsibility of each Organisational Unit, within the scope of its internal activity. Said units are specifically responsible for the proper characterisation and classification of the activities undertaken and the services contracted, refraining from promoting or accepting any solution that seeks to conceal a tax-relevant event with the aim of reclassifying or converting it into another fact that is exempt or subject to lower taxation.

The second line of defence is carried out by the Legal Department, which oversees the legal framework of the tax-relevant facts and activities promoted by, or involving, the Foundation, and by the Finance and Investments Department, which handles the monitoring of the tax choices made, the preparation of the necessary and mandatory declarations, interaction with the Tax Authorities, and coordination with the Legal Department in the interpretation of more contentious situations.

The third line of defence is ensured by the internal audit function, which is the responsibility of the Audit and Risk Management Department, in coordination with the Audit Committee.

6.

Transparency

The Calouste Gulbenkian Foundation conducts its activities according to high standards of transparency and integrity, including in the area of taxation. In this context, the Foundation's Tax Policy is public and available on its institutional website, ensuring that all stakeholders have access to its content.

The Foundation is fully committed to ensuring the clear, accurate and transparent disclosure of tax-relevant information, in compliance with applicable legal requirements and in line with best practices in the sector. This disclosure is carried out in particular through its institutional reporting instruments, such as the Annual Report.

Approval date
JULY 2025