

Information about the implemented tax strategy for the tax year 2021

The information about the implemented tax strategy of PAS Polska sp. z o.o. [**PAS Polska or the Company**] has been prepared and published based on article 27c sec. 1 in conjunction with the article 27b sec. 2 point 2 of the act on Corporate Income Tax [**the CIT Act**].

PAS Polska commenced its operations on 21 November 1995. Until 2002 the Company had operated under the name PAS Elektrotechnika-Polska Sp. z o.o., which was later changed into PAS Noma Systems Polska Sp. z o.o. Since January 2005 the Company had operated under the name PAS Appliance Systems Polska Sp. z o.o., however since February 2008 the Company has operated under the name PAS Polska Sp. z o.o. In accordance with the agreement concluded on 27 July 2006, there was change in the Company's shareholder from PAS Deutschland GmbH to PAS Management Holding GmbH, which acquired all the shares.

The Company's headquarter is in Opalenica, at 5 Stycznia street 90 – 92. The Company operates in Poland and has two production plants – one in Opalenica and the other one in Łódź, within the Łódź Special Economic Zone.

PAS Polska is a part of PAS Group, whose core area of activity is the production and sale of household appliance components and automotive industry components.

The Company is a manufacturing entity specializing in the production and sale of cable harnesses and electronic control panels used in household appliances, particularly in washing machines, dryers, microwaves and refrigerators.

1. Information about the taxpayer's processes and procedures for managing the execution of tax obligations and ensuring compliance with tax law

The primary objective of PAS Polska is to comply with all the requirements specified in applicable national and international tax laws.

The Company strives to accurately determine and promptly settle its tax obligations and other public law liabilities. When managing tax matters, the Company also considers the principles of appropriateness and fairness in relation to the use of tax incentives and exemptions provided by law.

PAS Polska accepts the lowest level of tax risk in its operations. Therefore, the Company responsibly implements a tax risk management policy, which is designed to reduce the likelihood of the tax risk occurrence. With this in mind, the employees responsible for tax-related functions within the Company regularly monitor changes in tax regulations and expand their knowledge. The Company also seeks the assistance of specialists, particularly tax advisors, to ensure the compliance with legal requirements in its operations.

The Company pays special attention to maintaining transparency and mutual respect in its cooperation with the tax authorities. PAS Polska approaches their representatives with openness, integrity, and professionalism.

The implemented tax policy aligns with the general principles of the Company's operations as a socially responsible business entity that strives for meaningful engagement within its environment, including fulfilling its tax obligations in Poland.

2. Information about the taxable person's voluntary forms of cooperation with the National Tax Administration

In 2021, the Company did not participate in any voluntary forms of cooperation with the National Tax Administration authorities. In particular, the Company did not enter into a cooperation agreement as referred to in Article 20s(1) of the Tax Ordinance.

Nevertheless, PAS Polska places great emphasis on maintaining full transparency towards the tax authorities. PAS Polska takes care to diligently and timely fulfill its informational obligations towards the tax authorities as required by applicable tax laws.

3. Information about the fulfilment of tax obligations by the taxpayer in the territory of Republic of Poland, including the number of mandatory disclosures, as referred to in Article 86a(1) (10) of the Tax Ordinance, submitted to the Head of National Tax Administration (broken down into respective taxes)

Tax obligations

The Company is aware that proper determination and timely payment of taxes contribute to the social and economic development of the country and its citizens.

In 2021, the Company fulfilled its tax obligations within the territory of the Republic of Poland, particularly in the following tax areas:

1. **CIT** - The Company is subject to Corporate Income Tax in relation to its activities carried out within the territory of the Republic of Poland. Therefore, the Company makes every effort to fulfill the obligations imposed by the law, including the payment of advance income tax installments. The Company acts as a withholding tax agent for the withholding tax on payments made to non-residents (**WHT**).
2. **PIT** - The Company is a payer of personal income tax due to employing a significant number of individuals. In 2021, the Company fulfilled its obligations as required by law, which included calculating, withholding, and remitting income tax, as well as preparing and submitting the necessary tax returns and information.
3. **VAT** - The Company is an active VAT taxpayer, and in 2021, it maintained and submitted the required VAT records, tax returns, and tax information to the tax authorities as mandated by law.

Tax schemes (MDR)

In 2021 the Company did not report any tax schemes.

Tax proceedings, tax audits, and customs and fiscal controls

In 2021, the Company was not involved in any tax proceedings, tax audits, or customs and fiscal audits.

4. Information on transactions with affiliated entities within the meaning of Article 11a.1 (4) of the CIT Act the value of which exceeds 5% of total assets from the balance sheet, identified on the basis of the latest approved financial statements of the company, including transactions with foreign tax residents

5. Information on restructuring actions planned or taken by the taxpayer which may have an impact on the amount of tax liabilities of the taxpayer or affiliated entities within the meaning of Article 11a.1 (4) of the CIT Act

In 2021, PAS Polska did not engage in, nor did it plan to engage in, any restructuring activities that could have affected the amount of its tax obligations or the tax obligations of related entities within the meaning of Article 11a(1)(4) of the CIT Act.

6. Information on the taxpayer's requests for general tax rulings, individual tax rulings, binding rate information or binding excise information

In 2021, the Company did not submit an application for:

- general tax ruling referred to in Article 14a(1) of the Tax Ordinance,
- individual tax ruling referred to in Article 14b of the Tax Ordinance,
- binding rate information as referred to in Article 42a of the VAT Act,
- binding excise information referred to in Article 7d.1 of the Excise Duty Act.

7. Information about tax settlements made by the taxpayer in territories or states applying harmful tax competition

In 2021, the Company engaged in transactions involving the purchase of goods and services as well as the sale of goods with entities registered in Hong Kong.

The Company did not engage in any other tax settlements in territories or countries applying harmful tax competition as indicated in executive acts issued under Article 11j(2) of the Act and under Article 23v(2) of the Act on Personal Income Tax, as well as in the announcement of the Minister responsible for public finance issued under Article 86a(10) of the Tax Ordinance.
