

**INFORMATION ON THE
EXECUTED TAX STRATEGY FOR YEAR 2022**

“BROWN BROTHERS HARRIMAN (POLAND)”
Spółka z ograniczoną odpowiedzialnością

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[Approved by: the Management Board of the Company]

BROWN BROTHERS HARRIMAN (POLAND) SP. Z O.O.

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BROWN BROTHERS HARRIMAN (POLAND) SP. Z O.O. WITH ITS REGISTERED OFFICE IN KRAKÓW AT THE ABOVE ADDRESS.
REGISTERED IN THE REGISTER OF ENTREPRENEURS OF THE NATIONAL COURT REGISTER HELD BY THE DISTRICT COURT
FOR KRAKÓW ŚRÓDMIEŚCIE IN KRAKÓW, WITH NUMBER KRS 0000365084. NIP PL6751437605. PLN 5,000.

List of terms and abbreviations

For the purposes of this document, the terms below have the following meanings:

Term/Abbreviation	Definition/Description
2022	Tax year starting 1 January 2022 and ending 31 December 2022
Company, BBH Poland	"BROWN BROTHERS HARRIMAN (POLAND)" spółka z ograniczoną odpowiedzialnością
Group, BBH Group	An international group of Brown Brothers Harriman companies all over the world
CIT Act	Act of February 15, 1992 on Corporate Income Tax (consolidated text, Journal of Law 2022, item 2587, as amended)
Tax Ordinance	Act of August 29, 1997 - Tax Ordinance (consolidated text, Journal of Law of 2022, item 2651 as amended)
VAT Act	Act of March 11, 2004 on Value Added Tax (i.e. Journal of Laws 2022 item 1570 as amended)
Excise Tax Act	Act of December 6, 2008 on Excise Tax (consolidated text Dz.U. of 2022, item 143, as amended).
PIT Act	Act of July 26, 1991 on Personal Income Tax (consolidated text, Journal of Law of 2022, item 2647 as amended)

Introduction

This document presents the information on execution of the tax strategy in 2022 by "BROWN BROTHERS HARRIMAN (POLAND)" spółka z ograniczoną odpowiedzialnością which is a part of the Brown Brothers Harriman Group in Poland.

BBH Poland as a corporate income tax taxpayer with a turnover exceeding EUR 50 million achieved in the fiscal year ended December 31, 2022, is required to prepare and publish information on the executed tax strategy for the fiscal year ended December 31, 2022.

This information on the executed tax strategy has been prepared in accordance with Article 27c of the Corporate Income Tax Act of February 15, 1992 (consolidated text, Journal of Laws 2022, item 2587, as amended) (the "CIT Act").

Information that is covered by trade, industrial, professional or manufacturing process secrets, as well as information to which access is restricted due to applicable laws or contractual obligations in this regard or arising from business decisions planned or made by the Company, may have been excluded from publication.

„BROWN BROTHERS HARRIMAN (POLAND)” Sp. z o.o.

The main subject of business activity of BBH Poland is the provision of documentation and data management services related to administrative and operational support - so-called "back office" support. Recipients of the activities performed by BBH Poland are BBH Group entities that are foreign tax residents. The recipients use the support services provided by the Company in the course of providing services to external clients of the BBH Group, such as, for example, banks and collective investment institutions.

Table 1. Basic information about the Company

Company name	"BROWN BROTHERS HARRIMAN (POLAND)"
Company registered office	ul. Stanisława Klimeckiego 1, 30-705 Kraków
Identification data	KRS (National Court Register) number: 0000365084 NIP (Taxpayer Identification Number) number: 6751437605 REGON (Business Statistics Number) number: 121337007
Share capital	PLN 5 000
Date of entry into the register of entrepreneurs of the National Court Register	2010-09-13
Number of employees as of the end of 2022	1 636

Processes and procedures for managing the fulfillment of obligations under tax law and ensuring their proper performance

Legal basis: Under art. 27c(2)(1)(a) of the CIT Act a taxpayer should provide information on the processes and procedures for managing the performance of its obligations under tax law and ensuring their proper execution.

The Company makes business decisions taking into account tax obligations and ensuring due diligence in all related areas. The Company's rules of conduct for tax matters in 2022 were based on the provisions of tax law and generally accepted good practices in this area. In order to effectively implement the rules of conduct, BBH Poland has developed appropriate processes and procedures to ensure the proper execution of its obligations under the tax law. They were developed and implemented taking into account the nature of the Company, its organizational structure and the specifics of providing administrative and operational support services under which the Company operates.

An important role in the proper fulfillment of the Company's tax obligations is also ensured by the Group to which the Company belongs - the BBH Group, whose principles and mission include timely filing of tax returns and making proper tax payments, maintaining an open and transparent dialogue with tax authorities, or monitoring any changes in laws and regulations and assessing their potential consequences. The Group's goal is to conduct its business, including tax settlements, in an ethical and correct manner. To achieve this goal, the Group has adopted high standards related to the ethical dimension of business conduct by all BBH Group companies and by the Group's business partners.

In order to ensure compliance of tax settlements with regulations and to secure the stability of the processes performed, duties were carried out by qualified specialists employed by the Company with extensive knowledge of taxation, supported by highly specialized members of the BBH Group's company-wide tax team. The performance of duties was facilitated by the use of developed IT and data processing systems, which allow for reliable tax settlements, as well as streamlined data flow.

The Company proceeded in accordance with its tax strategy, which defines the Company's approach to key tax issues, i.e. the principles for handling tax matters, and implemented written procedures for the settlement of individual taxes to ensure that settlements comply with tax laws.

Risk management and internal audits

In the scope of risk management and control, the Company took steps to identify potential tax risks through appropriate controls and monitoring, and thereafter to eliminate or reduce them. The Company manages the risk by following a conservative tax profile, striving to permanently improve the tax risk profile and to minimize the negative effects of the misinterpretation that could lead to a dispute with tax authorities.

Risk identification and assessment is based on the experience and expertise of BBH Poland employees, as well as employees of the BBH Group's company-wide tax team. BBH Group's company-wide tax team is informed about tax risks in Poland and co-decides on actions taken to reduce the risk. Risk level assessment is often carried out with the support of professional consulting companies with which BBH Poland cooperates on an ongoing basis.

The Company's employees whose activities may affect BBH's tax settlements continuously follow changes in tax laws to ensure that settlements are compliant with applicable laws. In addition, Group tax specialists are responsible for coordinating activities that have a significant impact on the Company's tax settlements in a consistent manner for the BBH Group, while ensuring compliance with local tax regulations.

Employees are also required to follow the Company's Tax Code of Conduct, which is consistent and coherent with the values that BBH Poland adheres to while implementing its strategy and business goals.

Information management and record keeping

In order to ensure the correct and complete record of the collected data, the Company was in possession of IT tools which maintain the integrity of the data entered and automate work, e.g. Oracle Peoplesoft. The IT tools were adapted to the current needs of the Company and formed the basis for the proper preparation and completion of tax returns, financial statements and other statutory obligations.

Voluntary forms of cooperation with the bodies of the National Revenue Administration (KAS)

Legal basis: Under art. 27c(2)(1)(b) of the CIT Act, a taxpayer should provide information on voluntary forms of cooperation used by the taxpayer with the authorities of the National Revenue Administration.

The Company did not use any voluntary forms of cooperation with National Revenue Administration authorities within the meaning of article 27c paragraph 2 point 1 letter b of the Corporate Income Tax Act.

The Company did not use any voluntary forms of cooperation with the authorities of the National Tax Administration within the meaning of Article 27c (2) para. 1 letter b of the CIT Act, such as participation in the Cooperative Tax Compliance or entering into an advance pricing agreement (APA).

Information on the tax obligations fulfilled by the Company on the territory of the Republic of Poland

Legal basis: Under art. 27c(2)(2) of the CIT Act, a taxpayer should provide information on the fulfilment of its tax obligations in the territory of the Republic of Poland along with information on the number of information provided to the Head of the National Tax Administration on tax schemes referred to in Article 86a § 1 item 10 of the Tax Ordinance, broken down by the taxes to which they relate.

The overriding goal of the Company in terms of tax obligations was reliable reporting and compliance with regulations, including timely submission of all tax declarations, forms and information, collecting documentation and meeting tax payment deadlines with due diligence. BBH Poland made every effort to ensure that the information provided reflects the facts faithfully and precisely and is complete, up-to-date and transparent.

The Company appropriately fulfilled its tax obligations in all areas required by tax law, taking into account the scope of the Company's operations. The main taxes under which the Company performed its obligations are corporate income tax (CIT) and value added tax (VAT). Information on the settlement of corporate income tax, in particular, value of tax revenues, tax deductible costs, tax income or due tax are published by the Ministry of Finance on its website¹.

In addition, BBH Poland performed the obligations of the tax remitter in the area of personal income tax (PIT) and withholding tax.

¹ <https://www.gov.pl/web/finanse/indywidualne-dane-podatnikow-cit>

Information on the amount of information on tax schemes provided to the Head of the National Revenue Administration (KAS), broken down by taxes to which it relates

Legal basis: Under Article 27c(2)(2) of the CIT Act, the taxpayer shall provide information regarding the taxpayer's performance of tax obligations in the territory of the Republic of Poland, together with information on the number of information provided to the Head of the National Tax Administration on tax schemes referred to in Article 86a § 1(10) of the Tax Ordinance, broken down by the taxes to which they relate.

In 2022, the Company verified whether certain events result in the obligation to report tax schemes and did not identify any events that would be subject to the obligation to report as a tax scheme. Therefore, in 2022, the Company did not provide the Head of the National Revenue Administration with any information on tax schemes pursuant to article 27c paragraph 2 point 2 of the Corporate Income Tax Act.

Additionally, the Company regularly verifies events in terms of the obligation to report tax schemes.

Information on transactions with related entities

Legal basis: Under Article 27c(2)(3)(a) of the CIT Law, taxpayers shall provide information on transactions with related parties within the meaning of Article 11a(1)(4) of the CIT Law, the value of which exceeds 5% of total assets within the meaning of the accounting regulations, as determined on the basis of the company's last approved financial statements, including entities that are not tax residents of the Republic of Poland.

In 2022, the Company had transactions with related parties within the meaning of Article 11a (1) (4) of the CIT Act, the value of which exceeds 5% of the total balance sheet assets within the meaning of the accounting regulations.

The balance sheet total of assets within the meaning of the accounting regulations, disclosed in the financial statements for 2022, as of the date of preparation of this document amounted to PLN 125,141,364.00.

Accordingly, the Company indicates the following transactions exceeding 5% of total assets:

- sale of back-office services to related entities based in the United States, Ireland and Luxembourg.

The above transaction information is consistent with the transfer pricing information (TPR-C form) provided by the Company for the fiscal year 2022.

In addition, the Company has timely fulfilled its transfer pricing obligations. In accordance with the applicable regulations, the Company verified the transactions covered by the documentation obligation in 2022, prepared the Local File with the relevant comparative analyses, and has in place the Group Master File. The Company also timely filed transfer pricing information (TPR-C form) and a statement on the preparation of local transfer pricing documentation for 2022.

Information on restructuring activities planned or undertaken by the Company that may affect the amount of tax liabilities of the Company or related entities

Legal basis: Under art. 27c(2)(3)(b) of the CIT Act, a taxpayer should provide information on restructuring activities planned or undertaken by the taxpayer that may affect the amount of tax liabilities of the taxpayer or related entities within the meaning of art. 11a(1)(4) of the CIT Act.

In 2022, the Company did not undertake or plan to undertake any restructuring activities that could affect the amount of the Company's tax liabilities within the meaning of article 11a paragraph 1 point 4 of the Corporate Income Tax Act.

Information on making tax settlements for the taxpayer in territories or countries which apply harmful tax competition

Legal basis: Under art. 27c(2)(5) of the CIT Law, taxpayers shall provide information on making tax settlements of the taxpayer in territories or countries practicing harmful tax competition indicated in executive acts issued on the basis of Article 11j(2) of the CIT Law and on the basis of Article 23v(2) of the PIT Law, and in the announcement of the minister responsible for public finance issued on the basis of Article 86a § 10 of the Tax Ordinance.

The Company did not make tax settlements in territories or countries which apply harmful tax competition indicated in executive acts issued pursuant to article 11j paragraph 2 and pursuant to article 23v paragraph 2 of the Act of 26 July 1991 on personal income tax and in the announcement of the minister competent for public finance issued pursuant to article 86a paragraph 10 of the Tax Code.

In particular, in the above-mentioned territories/countries, in 2022, the Company:

- has not been registered for the purposes of tax settlement;
- did not submit tax declarations or forms;
- did not collect and pay taxes.

Information on motions submitted by the Company

Legal basis: Under Art. 27c(2)(4) of the CIT Act, taxpayers shall provide information on applications submitted for the issuance of:

(a) general tax interpretation referred to in Article 14a § 1 of the Tax Ordinance,

(b) tax law interpretation referred to in Article 14b of the Tax Ordinance,

(c) binding rate information referred to in Article 42a of the Value Added Tax Act,

(d) binding excise tax information, as referred to in Article 7d paragraph 1 of the Excise Tax Law.

In 2022, the Company did not submit any requests for:

- the general interpretations of tax laws within the meaning of Article 14a § 1 of the Tax Ordinance;
- an individual interpretation of tax laws within the meaning of Article 14b of the Tax Ordinance;
- binding rate information within the meaning of Article 42a of the VAT Act;
- binding excise information within the meaning of Article 7d Section 1 of the Excise Tax Act.