

## INFORMATION ON THE TAX STRATEGY IMPLEMENTED IN 2022 GLOBE TRADE CENTER S.A.

Pursuant to Article 27b and Article 27c of the Corporate Income Tax Act, this information presents the tax strategy of Globe Trade Center S.A. in the tax year ended 31 December 2022.

### Legal basis

Pursuant to Article 27c sec. 1 with reference to Article 27b sec. 2 point 2) of the Corporate Income Tax Act ("Act"), corporate income tax payers shall prepare and publish information on the tax strategy implemented in a given tax year, if the taxpayer's revenue value obtained in a given fiscal year exceeded the equivalent of EUR 50 million converted into PLN at the average EUR exchange rate announced by the National Bank of Poland on the last business day of the calendar year preceding the year in which the above limit was exceeded.

Pursuant to Article 27c sec. 4 of the Act, the taxpayer shall publish information on the implemented tax strategy for the tax year, prepared in Polish or its translation into Polish, on its website by the end of the twelfth month following the end of the tax year. The taxpayer's website shall include publicly available information on the tax strategy implemented for individual years.

Pursuant to Article 27c of the Act, information on the implemented tax strategy shall include, taking into account the nature, type and size of the business, in particular:

1. the following information regarding the taxpayer:
  - a. processes and procedures for managing the performance of obligations under the tax law and ensuring their proper performance,
  - b. voluntary forms of cooperation with the authorities of the National Revenue Administration.
2. information on the taxpayer's fulfillment of tax obligations in the territory of the Republic of Poland, including information regarding the number of pieces of information provided to the Head of the National Revenue Administration regarding tax schemes referred to in Article 86a § 1 point 10 of the Tax Ordinance, with a breakdown into particular taxes,
3. Information regarding:
  - a. transactions with related entities within the meaning of Article 11a sec. 1 point 4 of the Act, whose value exceeds 5% of the balance sheet total of assets within the meaning of accounting regulations, determined on the basis of the last approved financial statements of the company, including entities that are not tax residents of the Republic of Poland,

- b. restructuring activities scheduled or undertaken by the taxpayer which may affect the amount of tax liabilities of the taxpayer or related entities within the meaning of Article 11a sec. 1 point 4 of the Act,
4. information regarding the taxpayer's applications submitted for the issuance of:
  - a. a general tax ruling referred to in Article 14a § 1 of the Tax Ordinance,
  - b. a tax law provisions ruling referred to in Article 14b of the Tax Ordinance,
  - c. binding information on rate referred to in Article 42a of the Value Added Tax Act,
  - d. binding information on excise referred to in Article 7d sec. 1 of the Act of 6 December 2008 on excise duty (Journal of Laws of 2020, item 722, as amended).
5. information regarding the taxpayer tax settlements in territories or countries applying harmful taxation competition indicated in the implementing acts issued on the basis of Article 11j sec. 2 and pursuant to Article 23v sec. 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 § 10 of the Tax Ordinance

- excluding information covered by a trade, industrial, professional or manufacturing process secret.

**Elements of the tax strategy of Globe Trade Center S.A. implemented in the fiscal year ended 31 December 2022.**

**I. Processes and procedures applied to the management of the performance of obligations under tax law and ensuring their proper performance.**

The Company has processes and procedures in place, developed for particular departments, regarding necessary actions to be taken for the proper fulfillment of tax obligations by the Company. The procedures are subject to periodical update.

The circulation of documents in the Company is fully automated and has several layers of acceptance/ qualification/ verification of documents and business events in terms of taxation.

In 2022, the Company permanently cooperated with a tax advisor responsible for the preparation and supervision of the day-to-day tax settlements of the Company. The Company's tax settlements were also verified by other external entities providing tax advisory services. Additionally, the Company consulted, on an ongoing basis, tax implications of the substantial transactions with renowned tax advisory providers. Regular cooperation with such external entities significantly reduces the risk of irregularities in tax settlement.

Training sessions on taxes are available to the Company's employees dealing with tax settlements, as well as electronic tools in order to consolidate, expand and constantly update their tax knowledge.

## **Procedures**

### **Tax settlements**

The Company has written procedures supporting correctness of tax settlements in the area of VAT and CIT, particularly with respect to the obligations of a remitter of the withholding tax.

### **Tax schemes**

The Company has a procedure in place to ensure the proper implementation of obligations regarding the tax schemes reporting to the Head of the National Revenue Administration.

### **Document circulation and approval**

The Company has a procedure in place for the circulation and approval of documents, part of which is also the tax assessment and qualification of documents.

### **Fixed assets**

The Company has a procedure in place regarding general principles of recognizing fixed assets.

### **Issuing sales invoices and corrective invoices**

The Company has a procedure in place for issuing sales invoices and corrective invoices.

### **ESG policy**

The company implemented an ESG policy based, among others, on the pillars of organizational order. The company applies the best management practices aimed at ethical action ensuring compliance with the law in all operations.

## **II. Voluntary forms of cooperation with the authorities of the National Revenue Administration.**

In 2022, the company did not participate in voluntary forms of cooperation with the authorities of the National Revenue Administration.

## **III. information on the taxpayer's fulfillment of tax obligations in the territory of the Republic of Poland, including information regarding the number of pieces of information provided to the Head of the National Revenue Administration regarding**

**tax schemes referred to in Article 86a § 1 point 10 of the Tax Ordinance, with a breakdown into particular taxes.**

In 2022, the company promptly fulfilled tax obligations incumbent upon it on the territory of the Republic of Poland in corporate income tax, personal income tax and social security contributions, value added tax, property tax and other public-law charges.

In 2022, the Company did not submit any information regarding tax schemes referred to in Article 86a § 1 point 10 of the Tax Ordinance to the Head of the National Revenue Administration.

**IV. Information regarding transactions with related entities within the meaning of Article 11a sec. 1 point 4 of the Act, whose value exceeds 5% of the balance sheet total of assets within the meaning of accounting regulations, determined on the basis of the last approved financial statements of the company, including entities that are not tax residents of the Republic of Poland.**

In accordance with the approved Company's 2022 financial statements, the balance sheet total of the Company's assets was PLN 5,704,616k.

Therefore, for 2022, the threshold for transactions subject to disclosure regarding the tax strategy implemented in 2022, amounted to PLN 285,230.8k.

Transactions that met the above criteria included an increase in the share capital of a subsidiary by converting a previously granted loan into capital and an increase in the share capital of the company through the issuance of new shares.

**V. Information regarding restructuring activities scheduled or undertaken by the taxpayer which may affect the amount of tax liabilities of the taxpayer or related entities within the meaning of Article 11a sec. 1 point 4 of the Act.**

On 4 January 2022, National Court Register registered the amendment to the Company's articles of association regarding the increase of the Company's share capital through the issuance of ordinary bearer shares.

On 10 January 2022, the Company received notifications from GTC Holding Zrt and GTC Dutch Holdings B.V regarding a change in the total number of votes in the Company resulting from issue of 88,700,000 ordinary O series shares and registration of the increase in the Company's share capital. Before the abovementioned change, GTC Holding Zrt held, directly and indirectly, 320,466,380 shares in the Company, entitling to 320,466,380 votes in the Company, representing 66% of the share capital of the Company and carried the right to 66% of the total number of votes in the Company. After the abovementioned change, GTC Holding Zrt holds, directly and indirectly, 359,528,880 shares in the Company, entitling to 359,528,880 votes in

the Company, representing 62.61% of the share capital of the Company and carrying the right to 62.61% of the total number of votes in the Company.

In 2022 the following events performed by the Company took place:

- Disposal of the following Serbian subsidiaries was executed: Atlas Centar d.o.o. Beograd, Demo Invest d.o.o. Novi Beograd, GTC BBC d.o.o., GTC Business Park d.o.o. Beograd, GTC Medjunarodni Razvoj Nekretnina d.o.o. Beograd and Commercial and Residential Ventures d.o.o. Beograd,
- Disposal of the Romanian subsidiary, Cascade Building S.R.L, was executed,
- Disposal of the Croatian subsidiary, GTC Matrix d.o.o., was executed.

**VI. information regarding the taxpayer's applications submitted for the issuance of:**

- a. a general tax ruling referred to in Article 14a § 1 of the Tax Ordinance,**
- b. a tax law provisions ruling referred to in Article 14b of the Tax Ordinance,**
- c. binding information on rate referred to in Article 42a of the Value Added Tax Act,**
- d. binding information on excise referred to in Article 7d sec. 1 of the Act of 6 December 2008 on excise duty (Journal of Laws of 2020, item 722, as amended).**

In 2022, the Company did not file any applications for the issuance of: (i) a general tax ruling referred to in Article 14a § 1 of the Tax Ordinance, (ii) a ruling regarding the tax law provisions referred to in Article 14b of the Tax Ordinance (iii) binding information on rate referred to in Article 42a of the Value Added Tax Act, (iv) binding information on excise referred to in Article 7d sec. 1 of the Act of 6 December 2008 on excise duty (Journal of Laws of 2020, item 722, as amended).

**VII. Information regarding the taxpayer's tax settlements in territories or countries applying harmful tax competition indicated in the implementing acts issued on the basis of Article 11j sec. 2 of the Act and in the announcement of the minister competent for public finance issued pursuant to Article 86a § 10 of the Tax Ordinance.**

Pursuant to § 1 of the Regulation of the Minister of Finance of 28 March 2019 on the determination of countries and territories applying harmful tax competition in the field of corporate income tax, harmful tax competition is applied in tax systems in the following countries and territories:

- 1) the Principality of Andorra;
- 2) Anguilla - Overseas Territory of the United Kingdom of Great Britain and Northern Ireland;
- 3) Antigua and Barbuda;
- 4) Sint-Maarten, Curaçao - countries included in the Kingdom of the Netherlands;
- 5) the Kingdom of Bahrain;
- 6) British Virgin Islands - an Overseas Territory of the United Kingdom of Great Britain and Northern Ireland;

- 7) Cook Islands - a Self-Governing Territory Associated with New Zealand;
- 8) the Dominica Community;
- 9) Grenada;
- 10) Sark - a Dependent Territory of the British Crown;
- 11) Hong Kong - a Special Administrative Region of the People's Republic of China;
- 12) The Republic of Liberia;
- 13) Macau - a Special Administrative Region of the People's Republic of China;
- 14) The Republic of Maldives;
- 15) The Republic of the Marshall Islands;
- 16) The Republic of Mauritius;
- 17) The Principality of Monaco;
- 18) The Republic of Nauru;
- 19) Niue - a Self-Governing Territory Associated with New Zealand;
- 18) The Republic of Panama;
- 21) The Independent State of Samoa;
- 22) The Republic of Seychelles;
- 23) Saint Lucia;
- 24) The Kingdom of Tonga;
- 25) US Virgin Islands - a US Unincorporated Territory;
- 26) The Republic of Vanuatu.

In accordance with the announcement of the Minister of Finance, Funds and Regional Policy of 27 February 2023 on the announcement of the list of countries and territories indicated in the EU list of non-cooperative jurisdictions for tax purposes adopted by the Council of the European Union, which were not included in the list of countries and territories applying harmful tax competition issued on the basis of the provisions on personal income tax and the provisions on corporate income tax, from the date of adoption of this list by the Council of the European Union (Polish Monitor 2023, item 236), the list of countries indicated above was extended by the following countries:

- 1) Bahamas,
- 2) The Republic of Fiji;
- 3) Guam;
- 4) Republic of Costa Rica;
- 5) The Republic of Palau;
- 6) The Republic of Trinidad and Tobago;
- 7) Russian Federation;
- 8) Turks and Caicos Islands,
- 9) American Samoa.

In 2022, the Company did not make tax settlements in the territories or countries indicated above.

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