

Delivering fiscal 2020.

Information on the implemented fiscal 2020 strategy.

The Management Board of RUBAU POLSKA SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered office in Warsaw, ul. Trojańska 7, 02-261 Warsaw, entered in the Register of Entrepreneurs of the National Court Register under KRS no.: 0000368335, holding NIP: 5252491135, REGON: 142519812, hereinafter referred to as: "**the Company**" pursuant to Article 27c in connection with Article 27b(2)(1) of the Corporate Income Tax Act of 15 February 1992 (consolidated text i.e. Journal of Laws of 2023, item 2805, of 2024, item 232.) has prepared this information on the Company's tax strategy, hereinafter referred to as: "**Tax Strategy**" for the fiscal year 2021, hereinafter, as: "**Fiscal Year**".

RUBAU POLSKA SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ is a company operating on the construction market in Poland since 2010 and is part of the Rubau Group.

The tax strategy supports the tax risk management process while influencing the prevention of tax risks by applying the following principles:

1. compliance with the law,
2. integrity and transparency of operations,
3. the ethical stance of the Company and its bodies,
4. payment of taxes in accordance with the relevant regulations,
5. no non-economic transactions,
6. lack of cooperation with countries applying harmful tax competition.

All of the Company's operations and transactions are real and are not motivated by creative tax planning.

The Company fulfils its reporting obligations in accordance with the applicable legislation, in particular submitting the declarations and reports required by law.

Information on the Company's processes and procedures for managing and ensuring the proper performance of its tax law obligations.

The Company has processes and procedures in place to manage the fulfilment of its tax law obligations and to ensure their correct implementation. These are processes based on day-to-day practice, as well as on the division of responsibilities that allow for double verification of the correctness of their implementation.

In terms of day-to-day practice, the Company implements the following processes, among others:

Due diligence. -

Before entering into a business relationship, the basic data of the counterparties are checked for compliance with the applicable tax requirements (e.g. registration of the counterparty as an active VAT payer and the existence of a bank account on the white list).

Expenditure approval procedure. -

Before payment is made, substantive verification is carried out and expenditure is authorised according to a responsibility matrix. Approved documents are checked from the point of view of their accounting and tax correctness and go through the full approval route according to the place of origin of the cost. Documents that are not correct are returned to the relevant persons for correction.

The procedure also takes into account compliance with bank payment regulations pursuant to Article 19 of the Act of 6.03.2018. Entrepreneurs' Law (Journal of Laws of 2018, item 646 as amended) and Article 108a of the Value Added Tax Act (i.e. Journal of Laws of 2024, item 361).

Procedure to confirm the actual transaction.

Each transaction, and thus the document confirming the economic event, is subject in the first instance to the approval of the ordering person responsible for the place where the cost arises. Representation and advertising costs, as well as other non-deductible costs, are additionally approved by the chief accountant.

Procedure for the performance of payer's duties with regard to the calculation of salaries, payroll tax and lump sum tax on dividends paid. The Company uses the services of a professional service provider in the scope in question ensuring the timeliness and correctness of the settlement of the payer obligations. The performance of these tasks is subject to the supervision and verification of a qualified employee of the Company responsible for the scope.

1. Information on the voluntary forms of cooperation applied by the Company with the National Tax Administration authorities.

The company did not pursue forms of voluntary cooperation with the KAS authorities, in particular no cooperation agreements, no prior pricing agreements and no anti-avoidance opinions.

2. Information on the fulfilment of tax obligations by the taxpayer within the territory of the Republic of Poland.

The company has an active operational business and does not avoid taxation. When in doubt, it makes use of available interpretations and tax explanations and external tax advisory services. Cooperation with auditors plays an important role in this respect. The company's board of directors makes decisions related to tax risk management. All business operations are of a business nature and are not motivated by creative business strategy planning.

The company declared and paid the following taxes during the fiscal year:

- CIT
- VAT
- PIT 4R
- PIT 8AR tax

3. Information on transactions with related parties within the meaning of Article 11a(1)(4), the value of which exceeds 5% of the balance sheet total of assets within the meaning of the accounting regulations, determined on the basis of the last approved financial statement of the company, including entities which are not tax residents of the Republic of Poland.

Transactions whose value exceeds 5% of total assets within the meaning of the accounting regulations, as determined on the basis of the Company's 2021 financial statements, include:

- Costs of bank guarantees
- Remuneration costs for members of the management board
- Non-resident staff costs
- Interest expense on a loan from a related party

4. Information on restructuring measures planned or undertaken by the taxpayer which may affect the tax liability of the taxpayer or of related parties within the meaning of Article 11a(1)(4).

The Company in 2020 did not plan or undertake restructuring activities that could affect the tax liabilities of the Company or related parties

5. Information about the taxpayer's applications for:

a) general tax interpretation referred to in Article 14a § 1 of the Tax Ordinance - the Company did not apply,

b) interpretations of the provisions of tax law referred to in Article 14b of the Tax Ordinance - the Company did not apply,

(c) the binding rate information referred to in Article 42a of the Value Added Tax Act - the Company did not submit applications

d) binding excise information referred to in Article 7d(1) of the Excise Duty Act of 6 December 2008 (Journal of Laws of 2020, item 722, as amended) - the Company did not submit applications

6. Information concerning the taxpayer's tax settlements in territories or countries applying harmful tax competition indicated in executive acts issued pursuant to Article 11j(2) and pursuant to Article 23v(2) of the Personal Income Tax Act of 26 July 1991 and in the announcement of the Minister competent for public finance issued pursuant to Article 86a(10) of the Tax Ordinance

The Company did not settle taxes in territories or countries with harmful tax competition.