



Poland

## **Information of ABP Poland sp. z o.o. on the implemented tax strategy for the tax year ended 31 March 2024**

### **Introduction to the information on the implemented tax strategy for the tax year from 1 April 2023 to 31 March 2024**

The amendment to the Corporate Income Tax Act of 15.02.1992 (Journal of Laws of 2021, item 1800, as amended; hereinafter referred to as the "**CIT Act**") effective as of 1 January 2021 imposes an obligation to prepare and publish information on the implemented tax strategy by taxpayers referred to in Article 27b(2)(1) and (2) of the CIT Act. Below we present a document that meets the requirements of Article 27c of the CIT Act.

### **About us**

ABP Poland sp. z o.o. (hereinafter referred to as "**ABP Poland**" or the "**Company**") has been operating in Polish since 2011. The main activity of ABP Poland is beef processing, production of a wide range of chilled and frozen meat products. ABP Poland's beef production plants are located in Poland in three production plants in Pniewy, Kłosowice and Tykocin. Beef produced by ABP Poland is of high quality, appreciated at prestigious competitions. We work closely with more than three thousand local farmers, supplying Europe's best-known retail companies, as well as those in the catering, manufacturing and wholesale industries.

### **Tax policy**

The Company treats the performance of tax obligations and transparency in tax reporting with the highest priority. Contacts with state and local government authorities, including the National Tax Administration, are characterized by transparency and openness. We make every effort to comply with our tax reporting obligations. We pay particular attention to the timeliness of the fulfillment of tax obligations.

The company wants to develop its main area of activity, which results in increased employment and higher tax revenues to the state budget and local governments.

Reliable fulfillment of tax obligations builds the image of the Company as a reliable contractor both for the Company's suppliers, who are largely farmers running farms in Polish, and for the recipients of our products.

The Management Board and its subordinate team of specialists in the area of finance, accounting and taxes attach great importance to the issue of tax risk management. When concluding a trade The Company endeavours to take advantage of the available tax incentives, reliefs and exemptions in accordance with the tax law. Thus, ABP Poland does not participate in constructions devoid of economic justification, which are created only for the purpose of tax avoidance or reduction of tax burdens. The decisions made by the Company are justified economically and business-wise.

**1. Information referred to in Article 27c(2)(1)(a) of the CIT Act, i.e. on the processes and procedures used by ABP Poland to manage the performance of obligations under tax law and to ensure their proper performance**

ABP Poland strives to properly fulfill all obligations resulting from the provisions of the tax law. In achieving the above goal, the Company is assisted by internal processes and procedures related to the management of the performance of tax obligations. The division of competences, duties and responsibilities in the area of taxes has been defined in detail.

Employees responsible for the correct calculation of taxes have the necessary knowledge and skills to ensure the proper performance of the Company's obligations under the provisions of the tax law. This knowledge is systematically supplemented by training and access to specialized publications. The functioning of individual processes and the application of the implemented procedures are supervised by the Management Board and the Company's management staff in order to effectively manage the areas of tax risk.

**2. Information referred to in Article 27c(2)(1)(b) of the CIT Act, i.e. on voluntary forms of cooperation with the National Tax Administration authorities used by ABP Poland**

In the tax year from 01/04/2023 to 31/03/2024, ABP Poland did not undertake voluntary forms of cooperation with the authorities of the National Tax Administration, in particular it did not conclude a cooperation agreement referred to in Article 20s of the Tax Ordinance Act of 29 August 1997 (Journal of Laws of 2021, item 1540, as amended; hereinafter referred to as the "**Tax Ordinance**").

However, the Company is fully ready to cooperate with tax authorities, and in its activities it remains open and transparent towards tax authorities.

**3. Information referred to in Article 27c(2)(2) of the CIT Act, i.e. relating to the performance of tax obligations by ABP Poland in the territory of the Republic of Poland, broken down by the taxes to which it relates**

In the tax year from 01.04.2023 to 31.03.2024. The Company fulfilled its tax obligations in the territory of the Republic of Poland, in particular with respect to the following taxes:

1) Corporate Income Tax:

- The Company was a taxpayer of corporate income tax in connection with the activity carried out in the territory of the Republic of Poland,
- The Company made every effort to comply with the obligations imposed by law with respect to the submission of the required tax returns and information. the Company made timely payments on account of income tax advances and, as a remitter, on account of lump-sum

income tax on revenues earned in the territory of the Republic of Poland by taxpayers referred to in Article 3(2) of the CIT Act,

- 2) Value Added Tax – the Company was an active VAT taxpayer and submitted tax returns (VAT-7, VAT-UE, VAT-UEK, JPK\_V7M) in accordance with the relevant regulations.
- 3) Excise duty – the Company was not a taxpayer of excise duty in the tax year to which this information relates.
- 4) Personal income tax – the Company was a personal income tax payer in the tax year. The company submitted PIT-4R tax returns and made tax payments in accordance with the relevant regulations.
- 5) Property tax - The company was a taxpayer of real estate tax. The company filed tax returns (DN-1) and made tax payments in accordance with the relevant regulations.
- 6) Agricultural tax - The company was a taxpayer of agricultural tax. The company filed tax returns (DR-1) and made tax payments in accordance with the relevant regulations.
- 7) Withholding tax – the Company filed withholding tax returns (CIT-10Z, IFT-2R) and made tax payments in accordance with the relevant regulations.

In addition, the Company monitored on an ongoing basis the possibility of other tax obligations occurring as part of its business activity.

**4. Information referred to in Article 27c(2)(2) of the CIT Act, i.e. relating to the number of information on tax schemes referred to in Article 86a § 1 item 10 of the Tax Ordinance submitted to the Head of the National Tax Administration**

The Company also takes into account the obligations under Chapter 11a of the Tax Ordinance with respect to the submission of information on tax schemes. Therefore, it monitors on an ongoing basis any events or arrangements occurring in its operations that may potentially constitute a tax scheme subject to reporting.

In the tax year ended 31 March 2023, ABP Poland did not identify arrangements constituting tax schemes in its operations, and therefore did not submit to the Head of the National Tax Administration information on tax schemes referred to in Article 86a § 1 item 10 of the Tax Ordinance.

**5. Information referred to in Article 27c(2)(3)(a) of the CIT Act, i.e. transactions with related parties within the meaning of Article 11a(1)(4) of the CIT Act, 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 Company's most recent approved financial statements**

In the tax year from 01.04.2023 to 31.03.2024, the sum of the value of transactions made by ABP Poland with related parties within the meaning of Article 11a(1)(4) of the CIT Act exceeded 5% of the balance sheet total of assets within the meaning of the accounting regulations, determined on the basis of the last approved financial statements of the Company as at 31.03.2024. These were meat sales transactions.

- 6. Information referred to in Article 27c(2)(3)(b) of the CIT Act, i.e. on restructuring activities planned or undertaken by the Company that may affect the amount of tax liabilities of the taxpayer or related parties within the meaning of Article 11a(1)(4) of the CIT Act**

In the tax year ended March 31, 2024, the Company did not undertake or plan any restructuring activities that could affect the amount of tax liabilities of the Company or its related entities within the meaning of Article 11a(1)(4) of the CIT Act.

- 7. The information referred to in Article 27c(2)(4)(a)-(d) of the CIT Act, i.e. concerning the applications submitted by the Company for issuance:**

- a) general tax interpretation referred to in Article 14a § 1 of the Tax Ordinance,**
- b) interpretation of tax law provisions 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 duty information referred to in Article 7d(1) of the Excise Duty Act of 6 December 2008 (Journal of Laws of 2020, items 722 and 1747).**

ABP Poland did not apply for the issuance of a general tax ruling referred to in Article 14a § 1 of the Tax Ordinance, individual interpretations referred to in Article 14b of the Tax Ordinance, binding rate information referred to in Article 42a of the Act on Tax on Goods and Services and binding excise information referred to in Article 7d(1) of the Act of 6 December 2008 on Excise Duty.

- 8. The information referred to in Article 27c(2)(5) of the CIT Act, i.e. concerning the Company's tax settlements in the territories or countries applying harmful tax competition indicated in the executive acts issued pursuant to Article 11j(2) of the CIT Act 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 finances issued on the basis of Article 86a § 10 of the Tax Ordinance.**

The Company did not make tax settlements in territories or countries applying harmful tax competition and was not a registered taxpayer in any of these territories or countries.