

Greiner Packaging Sp. z o.o.
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Information on the execution of the Tax Strategy in 2020

Greiner Packaging Sp. z o.o. (the 'Company'), in fulfilment of its obligations under Article 27c of the Corporate Income Tax Act of 15 February 1992 (Journal of Laws 2021, item 1800), has adopted a written version of tax strategy. The document was adopted by a resolution of the Company's Board of Directors and employees involved in processes related to tax settlements have constant access to the document.

The Company's tax settlements for 2020 were subject to analysis by an independent entity – an external tax advisory company.

According to the implemented tax strategy, the Company applies a number of processes and procedures for managing the performance of its obligations under tax law and ensuring their proper execution, including in particular those related to:

- a. the preparation of tax returns, including rules on the control of the correctness of their submission to the relevant tax authorities and the timely payment of tax receivables;
- b. the issuance of sales invoices, including a description of methods for appropriate verification of contractors;
- c. the execution of the purchases, making payments and processing purchase documents;
- d. resolving any tax uncertainties, including in particular the issue of whether it is allowed to recognise tax costs and to deduct input VAT;
- e. the settlement of personal income tax, including the correct preparation of tax returns and timely payment of the tax;
- f. the fulfilment of obligations regarding transfer pricing regulations, including the preparation of relevant documentation and submission of required declarations;
- g. the implementation of obligations relating to counteracting the failure to convey information on tax schemes (Mandatory Disclosure Rule);
- h. the implementation of withholding tax obligations, including in particular verifying whether the conditions allowing the application of a reduced rate or the exemption from withholding tax are fulfilled;
- i. reporting identified breaches in relation to tax and legal matters and proceeding in case of confirmed breaches;
- j. performance of the inventory of the warehouse and validation of its results;
- k. archiving of documents, including especially documents relevant from the perspective of tax settlements;
- l. the constant monitoring of tax law amendments and implementation of new statutory obligations;
- m. participation in tax proceedings, including rules on cooperation with a tax authority in the event of a tax investigation or tax audit.

The processes and procedures applied by the Company consider the specifics of the Company's operation and ensure reliable and timely fulfilment of tax obligations, as well as minimising the risk of the occurrence of incorrect tax settlements. As part of the indicated processes and procedures, the Company has additionally defined the scope of responsibility of individual employees for the proper performance of duties related to tax settlements.

The Company fulfils its tax obligations in the territory of the Republic of Poland, in particular by timely submission of appropriate tax returns, payment of tax receivables, payment of any other due public receivables, maintaining appropriate documentation related to tax settlements and archiving it for the required period of time, fulfilling obligations regarding transfer pricing regulations and withholding tax payments.

In 2020, the Company was a taxpayer of:

- a. corporate income tax;
- b. value added tax;
- c. real estate tax.

In 2020, the Company was a payer of:

- a. personal income tax;
- b. lump-sum income tax on certain revenues received within the territory of the Republic of Poland by the taxpayers subject to limited tax liability.

In 2020, the Company did not use voluntary forms of cooperation with the National Revenue Administration.

In 2020, the Company did not perform transactions with related parties (including entities that are not tax residents of the Republic of Poland) which value exceeded 5% of the total balance sheet assets, determined on the basis of the last approved financial statements of the Company.

In 2020, the Company had no tax settlements in territories or countries with harmful tax competition.

In 2020, the Company did not submit requests for a general tax interpretation, an individual interpretation of tax law, binding the tax rate information or excise information.

In 2020, the Company did not report to the Head of the National Revenue Administration any information on tax schemes within the meaning of Article 86a § 1 point 10 of the Tax Ordinance Act of 29 August 1997 (Journal of Laws 2021, item 1540). The Company executes its statutory obligations related to the reporting of tax schemes using a tool prepared for the entities of the entire capital group (including the Company) by a professional external tax advisor. The tool enables efficient identification of possible tax schemes and facilitates mutual information on their occurrence within the capital group.

In 2020, the Company did not undertake or plan any restructuring activities that could affect its tax liabilities or the tax liabilities of its affiliates.