

**Information on the tax
strategy executed by
Greiner Packaging sp. z
o.o.
in tax year
1.01.2022-31.12.2022**

Table of contents

I. Introduction	<i>Fehler! Textmarke nicht definiert.</i>
II. General	<i>Fehler! Textmarke nicht definiert.</i>
1. Information on the Company	2
2. Purposes of the Company's tax strategy.....	4
III. Information on the taxpayer-implemented management procedures and processes ensuring tax obligation performance and tax compliance along with information on the forms of voluntary cooperation with the National Revenue Administration	5
1. Information on the taxpayer-implemented management procedures and processes for tax obligation performance under tax law and for ensuring their proper performance.....	5
2. Information on the forms of voluntary cooperation with the National Revenue Administration applied by the Taxpayer	7
IV. Information on the fulfilment of tax obligations by the taxpayer in the territory of the Republic of Poland, along with information on the number of tax arrangements disclosed to the Head of the National Revenue Administration as per the type of tax to which they relate	7
1. Information on how the taxpayer fulfils their tax duties	7
2. Information on the number of information on tax schemes provided to the Head of the National Fiscal Administration	7
V. Information on related-party transactions and restructuring activities taken up by the taxpayer	8
1. Information on transactions with related parties as defined by Article 11a(1)(4) of the CIT Act, with the value exceeding 5% of the balance sheet total of the assets within the meaning of the Accounting Act, determined as per the last approved financial statement of the Company, including entities not being Polish tax residents	8
2. Information on the taxpayer's planned or performed restructuring activities that may impact the amount of tax liabilities due from the taxpayer or the taxpayer's related entities under Article 11a(1)(4) of the CIT Act.	8
VI. Information on the submitted applications	8
1. Applications for issuing a general tax ruling, pursuant to Article 14a(1) of the Polish Tax Code	8
2. Applications for issuing a tax ruling providing interpretation of tax regulations, pursuant to Article 14b of the Polish Tax Code	8
3. Applications for issuing Binding Rate Information, pursuant to Article 42a of the Polish VAT Act.	9
4. Applications for issuing Binding Excise Information, pursuant to Article 7d(1) of the Polish Excise Duty Act	9
VII. Information on the taxpayer's tax settlements in countries applying harmful tax competition	9

I. Introduction

This information is to fulfil by **Greiner Packaging sp. z o.o.** (hereinafter: the "**Company**") of the obligations under Article 27c of the Corporate Income Tax Act of February 15, 1992 (i.e. Journal of Laws of 2022, item 2587).

This information relates to the tax strategy implemented by the Company in the tax year **1.01.2022-31.12.2022**.

II. General

1. Information on the Company

Greiner Packaging spółka z ograniczoną odpowiedzialnością was established by a notarial deed of incorporation dated 2.01.1997, and is currently registered in the Register of Entrepreneurs of the National Court Register under **KRS number 0000039165** by the District Court for the City of Warsaw XXI Commercial Division of the National Court Register on August 28, 2001. The Company has its registered office at Al. XX-lecia 54, 96-515 Teresin, and its identification numbers are **NIP: 8371274842** and **REGON: 750057723**.

The Company has a branch in Grodzisk Mazowiecki with its headquarters at Plantowa Street 16, 05-825 Grodzisk Mazowiecki.

The Company is a member of the Greiner Packaging Group (hereinafter: the "**Group**"), which has specialized in the production of plastic packaging for more than 60 years, operating in 19 countries worldwide and employing approximately 4,900 people. The parent company of the Greiner Packaging Group is the Austrian company Greiner AG, which owns 100% of one of the Company's shareholders, Greiner Packaging International GmbH. The Company's shareholding structure is as follows:

- 1) Greiner Packaging Slusovice s.r.o., a company incorporated under Czech law, holding 3,271 shares with a total value of PLN 16,355,000.00 (62.3%);
- 2) Greiner Packaging International GmbH, a company incorporated under Austrian law, holding 1,979 shares with a total value of PLN 9,895,000.00 (37.7%).

Globally, Greiner Packaging Group's operations consist of two business units: Packaging and Assistec. The Packaging business unit produces packaging, while the Assistec business unit produces technical parts and assemblies made of plastic.

Locally, the Company's operations are carried out at two production facilities - in Teresin and Grodzisk Mazowiecki, with a portion of production allocated to each as follows:

- 1) Teresin plant - production of, among other things, cups, lids, rigid PP and PS films for thermoforming cups;
- 2) Grodzisk plant - production of, among other things, bottles, jars and production for the Assistec division.

Organizationally, 7 divisions have been separated in the Company, reporting to the Company's Board of Directors:

- 1) Logistics Division,
- 2) IT Division,
- 3) Health and Safety Division,
- 4) Sales Division,
- 5) Accounting Division,
- 6) Controlling Division,
- 7) HR Division.

In addition, each of the production plants has separate units dealing with, among other things, sales, production, purchasing, warehouse, maintenance, human resources management, unit management and environmental protection, as well as units dealing with areas necessary for the operations of a particular plant.

The Company's line of business is the production of packaging for the food, pharmaceutical, cosmetic and special-purpose packaging industries. The packaging produced by the Company is made of plastics and combinations of plastics and cardboard.

The object of the Company's activity indicated in the KRS in accordance with the PKD classification is as follows:

Predominant activity	
22.22.Z	Manufacture of plastic packaging
Other activity	
22.21.Z	Manufacture of plastic plates, sheets, tubes and profiles
22.29.Z	Manufacture of other plastic products
46.19.Z	Activity of agents dealing in sale of various types of goods
46.76.Z	Wholesale of other intermediate products
46.90.Z	Non-specialized wholesale trade

52.10.B	Warehousing and storage of other goods
82.92.Z	Packaging activity
18.13.Z	Service activities related to preparing for printing
96.09.Z	Other service activities, n.e.c.

The Company's share capital amounts to PLN 26.250.000,00. The financial results from operations in the period **1.01.2022-31.12.2022** amounted to (all figures are presented in thousands of PLN):

- Assets: PLN 263.283
- Sales revenues: PLN 448.836
- Net profit: PLN 38.626

The above values reflect the Company's recorded increase in total assets and net income against fiscal 2021 by 9,29% and 12,12%, respectively. In 2021, the corresponding values included in the Company's financial statements were:

- Assets: PLN: 238.824
- Net income: 394.437 PLN
- Net profit: PLN 30.754

2. Purposes of the Company's tax strategy

The Company pursues its tax strategy to ensure its obligations under the tax law are fulfilled. The performance of public-law obligations and payment of related liabilities to the State Treasury are treated by the Company's authorities as the Company's obligation resulting from its business activity in the territory of the Republic of Poland.

The Company's Management Board ensure effective and adequate control of the organization from the perspective of fulfilling the obligations imposed on the Company by the provisions of the tax law, in particular:

- exercises due diligence to ensure the correctness of the Company's tax accounts;
- demonstrating proactive approach in terms of defining values and developing organisational culture, including transparency of tax settlements;
- focusing on the screening of the Company's contractors and business partners, both in terms of their economic credibility as well as their registered office and their business activities;

- employs highly qualified staff for financial and tax services and invests in enhancing staff knowledge of tax law;
- makes decisions to mitigate tax risks by minimising threats from the external and internal environment.

The Company's tax strategy is constantly adapted to changes taking place in the external and internal environment of the organization, as well as to newly identified risks arising from operating in the trade industry.

III. Information on the taxpayer-implemented management procedures and processes ensuring tax obligation performance and tax compliance along with information on the forms of voluntary cooperation with the National Revenue Administration

1. Information on the taxpayer-implemented management procedures and processes for tax obligation performance under tax law and for ensuring their proper performance

a) Organization of the process of fulfilling obligations under the tax law

In accordance with the practical processes adopted in the Company, the organization of the process of fulfilling obligations under the tax law has the following course in the Company:

- 1) The Chief Accountant supervises the implementation of obligations under the tax law.
- 2) Ensuring the fulfillment of taxpayer and payer duties is the responsibility of the Accounting Department, which conducts day-to-day settlements, tax calculations, legal and tax qualification of individual economic events, and analyses based on verified source documents. The Accounting Department is supervised by the Chief Accountant, who at the same time is the main person in charge of internal communication with the Company's Board of Directors.
- 3) The Accounting Department includes Independent Accountants, Bookkeepers and other employees. Employees of the Accounting Department report organizationally to the Chief Accountant.
- 4) Employees of the Accounting Department perform all necessary settlements and tax calculations based on source data received.
- 5) The Company observes due diligence procedures in the verification of contractors. The Company verifies counterparties in the VIES system and obtains counterparties' certificates of residency.

- 6) The Company enters into transactions with related parties on an arm's length basis and prepares transfer pricing documentation.
- 7) The Company performs ongoing verification of the activities performed in terms of tax scheme reporting obligations. For this purpose, the Company uses a tool developed by an external entity for the entire Group to identify potential tax schemes in the Group.
- 8) 8) The employees of the Accounting Department archive the Company's tax settlement documents on an ongoing basis, which are stored electronically on the Company's internal drive. The Company retains accounting records for a period of at least 5 years counting from the year in which the tax payment deadline expires, but never less than the applicable statute of limitations on the amount due.

The Company takes all necessary measures to correctly determine public law receivables and pay them in a timely manner

b) Procedures applied

The Company has implemented procedures (both in writing and in the form of the so-called good practice) regulating in detail the implementation of tasks in the scope of accounting and taxes, in particular in the area:

- counteracting the failure to provide information on tax schemes;
- functioning of the Accounting Department;
- preparation of tax returns;
- issuing sales invoices;
- accounting for purchases;
- warehouse management;
- accounting for personal income tax;
- resolving tax doubts;
- tax costs or input tax deduction;
- cooperation with external tax advisors - permanent consulting;
- cooperation with external tax advisors - projects carried out outside permanent consultancy;
- accounting for withholding tax;
- obligations under transfer pricing regulations;
- reporting of tax schemes;
- monitoring the amendment of tax laws;
- participation in tax proceedings / tax audit;
- procedure of information on violations;
- archiving of documents.

2. Information on the forms of voluntary cooperation with the National Revenue Administration applied by the Taxpayer

So far, the Company has not entered into any cooperation with tax authorities that goes beyond the activities aimed at meeting its obligations under the tax law.

IV. Information on the fulfilment of tax obligations by the taxpayer in the territory of the Republic of Poland, along with information on the number of tax arrangements disclosed to the Head of the National Revenue Administration as per the type of tax to which they relate

1. Information on how the taxpayer fulfils their tax duties

The Company takes all necessary measures to correctly and timely fulfil its obligations arising from the provisions of the tax law in the territory of the Republic of Poland, in particular:

- identifies events that give rise to tax obligations;
- calculates and pays the tax due in a timely manner to the bank account of the competent tax office;
- provides tax authorities with the relevant declarations, lists, records, reports and information that it is obliged to submit in accordance with the tax provisions;
- prepares local transfer price documentation as well as benchmarking analyses;
- monitors executed transactions from the perspective of the provisions of Act of August 29, 1997. - Tax Ordinance (i.e. Dz. U. of 2023, item 2383, as amended; hereinafter: "Tax Ordinance") on tax schemes.

In the year **1.01.2022-31.12.2022** the Company fulfilled its tax obligations as a payer of the following taxes:

- corporate income tax;
- value added tax (VAT);
- property tax.

In the year **1.01.2022-31.12.2022** the Company fulfilled its tax obligations as a remitter of the following taxes:

- personal income tax (PIT) - on account of employee remuneration paid;
- flat-rate corporate income tax (WHT) - due to: dividends and other income from participation in the profits of legal entities.

2. Information on the number of information on tax schemes provided to the Head of the National Fiscal Administration

In the year 1.01.2022-31.12.2022 the Company submitted two MDR-1 information on tax schemes to the Head of the National Revenue Administration, which related to corporate income tax.

V. Information on related-party transactions and restructuring activities taken up by the taxpayer

1. Information on transactions with related parties as defined by Article 11a(1)(4) of the CIT Act, with the value exceeding 5% of the balance sheet total of the assets within the meaning of the Accounting Act, determined as per the last approved financial statement of the Company, including entities not being Polish tax residents

According to the Company's financial statements for the year **1.01.2022-31.12.2022**, the balance sheet total of the Company's assets was **PLN 263,282,110.65**. **5% of this sum constituting the transaction threshold amounts to PLN 13,164,105.53.**

In the year **1.01.2022-31.12.2022**, the Company did not conclude transactions with related entities whose value exceeded 5% of the balance sheet total.

2. Information on the taxpayer's planned or performed restructuring activities that may impact the amount of tax liabilities due from the taxpayer or the taxpayer's related entities under Article 11a(1)(4) of the CIT Act.

In the year 1.01.2022-31.12.2022, a decision was made to transfer production to the Company within the Group from another production site belonging to a related party. As a consequence of the change in the production location of the products, there was also a simultaneous transfer of customer relationships (i.e. intangible assets that are difficult to value).

VI. Information on the submitted applications

1. Applications for issuing a general tax ruling, pursuant to Article 14a(1) of the Polish Tax Code

In the year **1.01.2022-31.12.2022** the Company did not apply for issuing any general tax rulings.

2. Applications for issuing a tax ruling providing interpretation of tax regulations, pursuant to Article 14b of the Polish Tax Code

In the year **1.01.2022-31.12.2022** the Company did not submit any application for issuing any individual tax interpretation.

3. Applications for issuing Binding Rate Information, pursuant to Article 42a of the Polish VAT Act.

In the year **1.01.2022-31.12.2022**, the Company did not apply for binding rate information.

4. Applications for issuing Binding Excise Information, pursuant to Article 7d(1) of the Polish Excise Duty Act

In the year **1.01.2022-31.12.2022** the Company did not apply for issuing any binding excise information.

VII. Information on the taxpayer's tax settlements in countries applying harmful tax competition

In the year **1.01.2022-31.12.2022** the Company did not make any tax settlements in territories or countries applying harmful tax competition.