

INFORMATION ON THE IMPLEMENTED FISCAL STRATEGY FOR 2022

1. List of terms

For the purposes of this document, the following terms have the following meanings:

| Abbreviation | Definition/description |
|----------------------|--|
| FY | Fiscal year beginning 1 January and ending 31 December |
| Company, ETS | Ergo Technology & Services S.A. |
| ERGO Group/Munich Re | The international group to which the Company belongs. |
| PDOP Act | Act of 15 February 1992 on Corporate Income Tax (consolidated text: Journal of Laws of 2022, item 2587, as amended). |
| Tax Ordinance | Act of 29 August 1997 - Tax Ordinance (consolidated text of 2023, item 2383 as amended). |

Introduction

The document outlines how the Company implemented its tax strategy in 2022.

ETS, as a corporate taxpayer with revenues in excess of €50 million in the tax year ending 31 December 2022, is required to prepare and publish information on its ongoing tax strategy for the tax year ending 31 December 2022.

This information on the implemented tax strategy has been prepared in accordance with Article 27c(2) of the PDOP Act.

ERGO Technology & Services S.A.

Ergo Technology & Services S.A. specializes in designing, creating, implementing and integrating of comprehensive IT systems for business. It also specializes in managing large implementation projects. The company offers comprehensive IT services: consulting, business process analysis, implementation and integration of systems, including ready-made domain systems, turnkey design of *back-office*, *front office*, *middleware* and *business intelligence* solutions, preparation of infrastructure for IT solutions, training and IT support. The solutions proposed by ETS are mainly directed to the insurance sector.

ETS specializes in comprehensive business solutions that support the operations of financial institutions. The company has achieved a sustainable competitive advantage in this respect by serving the market of insurance companies, for which the constant monitoring, optimization and adaptation of business processes to the needs of the changing market is the basis for maintaining a competitive advantage.

Table 1. Basic information about the Company

| | |
|---|---|
| Name of the Company | ERGO Technology & Services S.A. |
| Registered office | 24 Leona Droszyńskiego Street 80-381 Gdansk |
| Identification data | KRS: 0000438903, NIP: 585-10-07-625, REGON: 190880611 |
| Share capital | PLN 1,303,000 |
| Date of entry in the National Court Register | 1995-06-29 |
| Number of employees (average employment in 2022) | 1209 |

Processes and procedures for managing the performance of obligations arising from tax law and ensuring their proper performance

The basic principles for dealing with tax matters have been based on tax legislation and common good practice in this area.

The Company fulfilled tax obligations in all areas required by tax law, taking into account the scope of ETS activities.

In order to fulfil its tax obligations effectively, the Company has structured its tax processes taking into account the nature of the ETS business, its internal structure and its role in the Group.

In the field of accounting and taxes, the Company uses its own staff. In the area of risk management and control, the Company carried out appropriate internal controls to ensure compliance.

In addition, the ETS engages qualified tax advisors to ensure its tax security, especially for new, large and recurring transactions.

The Company's Board of Directors is aware of the importance of tax compliance, proper management of tax matters and tax risks relating to the Company's operations.

The CFO and the Chief Accountant play a key role in tax matters. The Company ensures on an ongoing basis that employees who are not directly involved in tax matters are aware of the importance of reliable documentation of business operations.

ETS uses proven IT systems in its operations to streamline data flow and prepare correct tax returns.

Voluntary forms of cooperation with the National Tax Administration (KAS)

The Company has applied to the Head of KAS in 2019 to issue a unilateral pricing agreement for a transaction related to the acquisition of a licence and the provision of services for the implementation of licensed solutions concluded for two entities based in Poland. On 1 December 2023, the Company received decision in which Head of KAS issued Advance Pricing Arrangement for transaction involving provision of IT services by the Company to two related parties based in Poland.

Information on tax obligations carried out by the ETS on the territory of the Republic of Poland

In 2022, the Company fulfilled its obligations in the following areas:

- corporate income tax - data on PDOP settlements are published on the website of the Ministry of Finance,
- withholding tax,
- value added tax (VAT),
- customs duties,
- stamp duties,
- environmental fee,
- as payer in relation to the salaries of ETS employees, it settled personal income tax (PIT) and social and health insurance contributions (ZUS).

Information on tax schemes submitted to the Head of the National Tax Administration, broken down by the taxes to which they relate

In 2022, the Company did not provide the Head of the National Tax Administration with any information on tax schemes referred to in Article 86a par. 1 item 10 of the Tax Ordinance, due to the non-occurrence of such schemes.

Information on transactions with related parties

In 2022, ETS has entered into the following transactions, the value of which exceeded 5% of total assets, as determined on the basis of the Company's last approved financial statements:

- the Company's licensing of and support for the implementation of the licensed solutions to two related parties based in Poland,
- the provision of IT services to a related party based in Poland and a related party based in Germany,
- the provision of comprehensive support services to a related entity based in Germany.

Information on restructuring measures planned or undertaken by the Company

In 2022, the Company has not undertaken or planned to undertake any restructuring actions that could affect its tax liabilities. It also does not plan to take such actions in the future.

Information on tax settlements in territories or countries applying harmful tax competition

In 2022, the Company did not perform any tax settlements in territories or countries applying harmful tax competition, as indicated in the acts issued pursuant to Article 11j para. 2 of the Corporate Income Tax Act of 15 February 1992 and Article 23v para. 2 of the Personal Income Tax Act of 26 July 1991 and in the announcement of the Minister responsible for public finance issued pursuant to Article 86a para. 10 of the Tax Ordinance.

Information on applications submitted by the Company

In 2022, the ETS did not apply for :

- general tax interpretation,
- individual tax interpretation,
- binding rate information,
- binding excise information.