

**INFORMATION  
ON THE IMPLEMENTED FISCAL  
STRATEGY  
ERGO Technology & Services S.A.  
FOR 2023**

### 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 2023, item 2805, as amended)
Tax Ordinance	Act of 29 August 1997 - Tax Ordinance (consolidated text of 2023, item 2383 as amended).

## 1. Introduction

The document outlines how the Company, pursued its tax strategy in 2023.

ETS, as a corporate taxpayer with revenues in excess of €50 million in the tax year ending 31 December 2023, is required to prepare and publish information on its ongoing tax strategy for the tax year ending 31 December 2023.

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

## 2. Information about the Company

Ergo Technology & Services S.A. specializes in the design, development, implementation and integration of complex IT systems for business. It also specializes in managing large implementation projects.

The company's offer includes comprehensive IT services: consulting, business process analysis, implementation and integration of systems, including off-the-shelf domain systems, design of turnkey solutions in the areas of back-office, front office, middleware and business intelligence, preparation of infrastructure for IT solutions, training and IT support. The solutions proposed by ETS are mainly addressed 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 regard by serving the insurance company market, for which the constant monitoring, optimization and adaptation of business processes to the needs of the changing market is fundamental to maintaining a competitive edge.

**Table 1. Basic information about the Company**

<b>Company name</b>	<b>ERGO Technology &amp; Services S.A.</b>
<b>Registered office</b>	24 Leona Droszyńskiego Street 80-381 Gdansk
<b>Identification data</b>	KRS: 0000438903, NIP: 585-10-07-625, REGON: 190880611
<b>Share capital</b>	PLN 1,303,000
<b>Date of entry in the National Business Register</b>	1995-06-29
<b>Number of employees (average employment in 2023)</b>	1308

### **3. Processes and procedures for managing and ensuring the proper performance of tax law obligations**

The basic principles for dealing with tax matters have been based on tax legislation and common good practice in this area. The company complied with its 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 area of accounting and taxation, 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 ECJ 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 also employees 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.

ETS had its annual financial statements for 2023 audited by an independent auditor. The audit resulted in a positive auditor's opinion, indicating the compliance of the prepared statements with the legal regulations and the correctness of the accounts.

The parent company of the Company is ERGO Technology & Services Management AG, Düsseldorf. ERGO Technology & Services Management AG does not prepare consolidated financial statements. Consolidated financial statements are prepared at the top level of the group, which includes the Company as a subsidiary, by MÜNCHENER RÜCKVERSICHERUNGS-GESELLSCHAFTIENGESELLSCHAFT (Munich RE), Munich.

**4. 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 a decision in which the Head of KAS issued a unilateral prior pricing agreement for a transaction involving the provision of IT services by the Company to two related parties based in Poland.

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

In 2023, the Company fulfilled its commitments in terms of:

- 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 duty,
- environmental fee,
- as payer in relation to the salaries of ETS employees, accounted for personal income tax (PIT) and social and health insurance (ZUS) contributions.

**6. Information on tax schemes submitted to the Head of the National Fiscal Administration**

In 2023, the Company provided the Head of the National Tax Administration with one information on tax schemes referred to in Article 86a par.1(10) of the Tax Ordinance relating to personal income tax and received confirmation of the assignment of the tax scheme. To date, the Company has not taken any further actions related to the implementation of the scheme.

**7. Information on transactions with related parties**

In 2023, 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 and a related party based in Estonia,
- the provision of IT services to a related party based in Poland and four related parties based in Germany,
- the provision of comprehensive support services to an affiliate based in Germany.

ETS prepares transfer pricing documentation as required by Polish tax legislation.

**8. Information on restructuring measures planned or undertaken by the Company**

In 2023, the Company has not undertaken or planned to undertake any restructuring activities that could affect tax liabilities.

**9. Information on tax settlements in territories or countries applying harmful tax competition**

In 2023, the Company did not make any tax settlements in territories or countries applying harmful tax competition, as indicated in the executive 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.

**10. Information on applications submitted by the Company**

In 2023, the ETS did not apply for :

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