

**Information on the implemented tax strategy
for the fiscal year 2022
intive GmbH
operating in Poland through its branch
intive GmbH Sp. z o.o. Oddział w Polsce**

This document constitutes information on the implementation of the tax strategy by intive GmbH, Regensburg, Germany (hereinafter: "intive" or the "Company"). This information has been prepared and made public in order to fulfil the obligation imposed on the Company by the provisions of Article 27c of the Corporate Income Tax Act of 15 February 1992 (hereinafter: the "CIT Act"), which came into force on 1 January 2021.

The information relates to the tax year that begins on 1 January 2022 and ends on 31 December 2022.

Basic information about the company

Intive GmbH is a company incorporated under German law, operating in the territory of the Republic of Poland through its branch (hereinafter: "branch"). It is part of the intive Group (hereinafter: "Group" or "intive Group"), which provides services worldwide through companies located on three continents (South America, North America and Europe).

As part of its activities, the intive Group, including intive GmbH and its Polish branch, provides software services using the latest telecommunications solutions. The range of services offered includes, amongst others: the development of mobile applications, web platforms or integrated IT systems. The intive Group focuses mainly on the creation of customised IT solutions based on existing software and IT solutions. The Group also offers the creation of new products and solutions from scratch to solve existing problems in a way that is completely tailored to the needs of its customers. In addition, as part of its activities, the Group also offers after-sales services in the form of maintenance, upkeep, security evaluation, service quality testing and further development of the IT solution provided to the customer.

Intive GmbH was among the largest corporate income taxpayers in Poland in 2019, 2021 and 2022 as defined in Article 27b paragraph 2(2) of the CIT Act, i.e. taxpayers other than tax capital groups, where the value of revenue earned in the tax year exceeded the equivalent of EUR 50 million converted into PLN according to the average euro exchange rate announced by the National Bank of Poland on the last working day of the calendar year preceding the year in which individual taxpayer data was made public (respectively, it was PLN 226,096,517.15 in 2019, PLN 299,103,522.20 in 2021 and PLN 407.857,58 in 2022).

The correct fulfilment of tax obligations and the timely payment of all public liabilities are key values of the Company. The Company does not undertake activities that could be classified as tax optimisation or tax avoidance, nor does it undertake activities that could increase tax risks or expose the state or local government budgets to undue depletion. The Company's approach to tax settlements is based on careful review of the tax consequences of business activities and not undertaking tax-risky initiatives.

Key points of intive GmbH's tax strategy

In implementing its tax strategy, Intive GmbH primarily emphasizes compliance with the requirements set out in applicable national laws, including tax law, as well as the provisions of European Union law and ratified international agreements. It makes every effort to pay due taxes and other public law charges to state or local government bodies within the statutory deadlines. It is important for the Company to cooperate with tax authorities in a professional and transparent manner and to immediately clarify any doubts or questions from the authorities.

When planning specific business operations, the Company takes into account the impact of the potential effects of the materialisation of tax risks on its business, its reputation, as well as the reputation of the intive Group as a whole. It does not undertake any business operations (both current operational and long-term investment) that are unjustified by actual strategic and business needs and are only intended to lead to tax benefits. In addition, measures are taken to properly manage tax risks arising from changes in tax laws and their interpretations and from transactions, paying particular attention to the systematic monitoring of dynamic changes in tax regulations and their interpretations and analysing their impact on the Company's operations, including the provision of training on tax laws to employees responsible for performing tax functions, and in the event of uncertainty as to the correct interpretation of the relevant tax laws, the Company seeks assistance from external tax advisers.

Information on the taxpayer's processes and procedures for managing and ensuring the proper performance of its obligations under tax law

The processes that affect the correctness of the Company's tax settlements are those that involve employees from many departments, not only from the so-called back office but also from the operational departments.

It is from them that the department dealing with the implementation of the tax function has information on the economic operations carried out, which makes it possible to correctly recognise these events in the tax settlements (recognising them in the appropriate reporting periods according to the correctly determined moment when the tax obligation arises or applying appropriate tax rates). Documentation is also collected, which forms the basis for the recognition of business operations in the Company's books and for its tax settlements. Also, the verification of counterparties within the framework of so-called due diligence takes place as a result of the cooperation of the operational and financial departments.

The Company's finance departments are also concerned with the proper fulfilment of formal obligations, including the timely submission of tax returns and information as well as any other required documents (e.g. transfer pricing documentation). The Company also pays particular attention to the timely payment of taxes established as part of these settlements.

A number of procedures operating within the organisation mainly concern:

- issuing sales invoices to customers,
- recording purchases made by the Company,
- accounting for business trips and settlements with employees,
- recording of fixed assets and equipment,
- the determination of exchange rate differences, the write-down of receivables and the establishment of cost/income provisions.

Since 2022, all processes at intive have been supported by an ERP system implemented in key companies in the Group, including the Polish branch.

In addition, procedures are in place for the determination of withholding tax, the preparation and sending of JPK files, the calculation of monthly advance payments and the annual income tax settlement.

In the event that any doubt arises regarding any of the processes resulting from changes in tax law, changes in its interpretation or in view of the emergence of new circumstances or the planning of new projects, the Company uses the assistance of professional, reputable consulting firms. The employees responsible for performing the tax function regularly participate in numerous training courses, which allow them to keep their tax knowledge up-to-date and to continuously improve their competences.

Information on voluntary forms of cooperation with the National Tax Administration authorities applied by the taxpayer

The Company did not undertake any voluntary forms of cooperation with the National Tax Administration authorities in the tax year for which this information is prepared, in particular it did not conclude a cooperation agreement referred to in Article 20s of the Tax Ordinance Act of 29 August 1997 (i.e. Dz.U. of 2021, item 1540 as amended; hereinafter: the Tax Ordinance), did not apply for a advance pricing agreements or an opinion on the application of the exemption which allows to benefit from relief at source method.

Although the Company has not taken advantage of the aforementioned forms of cooperation, it does not exclude the possibility of taking such an action in the future, provided that there are applicable premises for doing so.

Information on the implementation of tax obligations by the taxpayer in the territory of the Republic of Poland, together with information on the number of notifications on mandatory disclosure rules referred to in Article 86a § 1 item 10 of the Tax Ordinance Act, provided to the Head of the National Revenue Administration, broken down by the taxes to which they relate

Being a Company governed by German law, intive GmbH realized tax obligations in the territory of the Republic of Poland, applicable to income earned in its territory.

In the fiscal year for which this information is prepared, intive GmbH realized tax obligations in the territory of the Republic of Poland, in particular with regard to the following taxes:

- Corporate income tax – operating in the Republic of Poland through its branch, intive GmbH calculates monthly tax revenues and costs on activities performed in the territory of the country, together with payment of tax advances for this tax, and by the end of the third month following the end of the tax year, prepares the annual CIT-8 return together with the entire year's tax settlement. The company prepares transfer pricing documentation and submits it when requested by the authorities, as well as submits completed TPR returns to the competent authority in a timely manner;
- lump-sum tax on income/profit earned in the territory of the Republic of Poland by non-residents (so-called withholding tax) – if there are any payments qualifying for withholding tax in a given month, the Company, as the remitter, pays the due tax by the seventh day of the following month and completes the annual CIT-10Z return together with IFT information, which it simultaneously sends to its counterparties and to the competent tax office;
- Value added tax (VAT) – intive GmbH is an active VAT taxpayer (registered under PL1070043765) and therefore submits the required declarations on a monthly basis and prepares and sends JPK files, as well as prepares corrections to these documents with the amended files if necessary;
- personal income tax – the company, as the remitter, pays income tax on the salaries of its employees to the tax office, as well as submits PIT-11 returns annually and prepares and sends PIT-4R returns to the competent tax office

intive GmbH did not identify tax schemes in its business operations in 2022, and therefore did not provide the Head of the National Revenue Administration with information on tax schemes referred to in Article 86a § 1(10) of the Tax Ordinance Act.

Information on 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 last approved financial statements of the Company, including entities which are not tax residents of the Republic of Poland

As part of its operational activities, intive GmbH carries out a number of transactions with its related parties. These are operations that are necessary for the performance of the services provided to third parties, for the administration of the entire organisational structure, as well as for the acquisition of the financing necessary for the operation.

During the fiscal year for which this information is prepared, intive GmbH carried out the following transactions, the value of which exceeded 5% of its total assets within the meaning of the accounting regulations, as determined on the basis of the latest approved financial statements of the Company's branch:

- providing programming services within the Group – during the year, programmers employed at the branch provided services on projects belonging to other companies in the Group, for which the companies were charged at agreed rates that correspond to market rates;
- purchase of software services within the group – programmers employed by other companies in the Group provided services to projects assigned to the branch, and therefore the branch was charged an expense under the common transfer pricing policy;
- sales support services from related parties - related parties in the United States and the United Kingdom, due to the nature of the market there, provide sales support services locally to the Polish branch
- Acquisition of intra-group funding – during 2022, the branch also raised funds for its day-to-day operations from other Group entities.

Information on restructuring measures planned or undertaken by the taxpayer which may affect the tax liability of the taxpayer or of related parties within the meaning of Article 11a(1)(4),

Intive GmbH, which is part of the rapidly growing intive Group, is carrying out a number of restructuring measures to simplify its structure and merge companies operating within the same country. The restructuring carried out in the Group during 2022 did not involve the Polish branch and did not affect tax liabilities.

Any planned restructuring measures will not directly affect the activities of the Polish branch, but only indirectly through the parent company (merger of German companies) or through shareholdings (mergers of companies in Argentina).

Bearing in mind that the IT services market and the Group's development plans are subject to great dynamics, it cannot be ruled out that such measures will take place in future years.

Information on applications submitted by the Company for a general tax ruling referred to in Article 14a § 1 of the Tax Ordinance

In 2022, the Company did not apply for a general ruling of the tax law provisions referred to in Article 14a § 1 of the Tax Ordinance.

Information on applications submitted by the Company for the issuance of an individual ruling of tax law provisions referred to in Article 14b of the Tax Ordinance

In 2022, the Company did not apply for an individual ruling of the provisions of the tax law referred to in Article 14b of the Tax Ordinance.

Information on applications submitted by the Company for Binding Rate Information referred to in Article 42a of the VAT Act

In 2022, the Company did not apply for Binding Rate Information as referred to in Article 42a of the VAT Act.

Information on applications submitted by the Company for the issuance of Binding Excise Information referred to in Article 7d(1) of the Excise Duty Act

In 2022, the Company did not apply for Binding Excise Information as referred to in Article 7d(1) of the Excise Duty Act.

Information on the taxpayer's tax settlements in territories or countries applying harmful tax competition indicated in executive acts issued on the basis of Article 11j(2) of the CIT Act and on the basis of Article 23v(2) of the Personal Income Tax Act and in the notice of the minister competent for public finance issued pursuant to Article 86a § 10 of the Tax Ordinance

In 2022, the Company did not make tax settlements for any taxes in 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 and in the notice of the minister responsible for public finance issued pursuant to Article 86a § 10 of the Tax Ordinance.