

**PRZEDSIĘBIORSTWO
PRZEŁADUNKOWO-SKŁADOWE
"PORT PÓŁNOCNY" SP. Z O.O.**

Information on the implemented tax
strategy for 2022

1. List of abbreviations and definitions

Tax Ordinance	Act of 29 August 1997 Tax Ordinance (consolidated text: Journal of Laws of 2021, item 1540, as amended)
Port Północny, Company	Przedsiębiorstwo Przeladunkowo-Składowe "Port Północny" Sp. z o.o.
Tax year	Company's fiscal year ended December 31, 2022
CIT Act	Corporate Income Tax Act of 15 February 1992 (consolidated text: Journal of Laws of 2021, item 1800, as amended)
PIT Act	Personal Income Tax Act of 26 July 1991 (consolidated text: Journal of Laws of 2021, item 1128, as amended)
Excise Duty Act	Excise Duty Act of 6 December 2008 (consolidated text: Journal of Laws of 2022, item 143, as amended)
VAT Act	Value Added Tax Act of 11 March 2004 (consolidated text: Journal of Laws of 2022, item 931, as amended)

2. Admission

In connection with the statutory obligation to prepare and publish information on the tax strategy for the tax year, in accordance with Article 27c of the CIT Act, the following information is presented on the tax strategy for the tax year, taking into account the nature, type and size of the business conducted by Przedsiębiorstwo Przeladunkowo-Składowe "Port Północny" Sp. z o.o., with its registered office in Gdańsk, entered in the register of entrepreneurs of the National Court Register, kept by the District Court Gdańsk-Północ in Gdańsk, VII Commercial Division of the National Court Register, KRS 0000073870, REGON 190009841, NIP 5830008536.

This information has been prepared on the basis of the provisions of Article 27c of the CIT Act and presents information on:

- 1) applied by the taxpayer:
 - a. processes and procedures for managing the performance of obligations arising from tax law and ensuring their proper performance,
 - b. voluntary forms of cooperation with the National Revenue Administration,
- 2) the taxpayer's performance of tax obligations in the territory of the Republic of Poland, together with information on the number of information provided to the Head of the National Tax Administration on tax schemes referred to in Article 86a § 1 point 10 of the Tax Ordinance, with an indication of the taxes to which the schemes relate,
- 3) 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 accounting regulations, determined on the basis of the company's last approved financial statements, including entities that are not tax residents of the Republic of Poland,
- 4) restructuring activities planned or undertaken by the taxpayer that may affect the amount of tax liabilities of the taxpayer or related entities within the meaning of Article 11a(1)(4) of the CIT Act,
- 5) applications submitted by the taxpayer for the issuance of:
 - a. general tax ruling referred to in Article 14a § 1 of the Tax Ordinance,
 - b. interpretation of tax law provisions referred to in Article 14b of the Tax Ordinance,
 - c. binding rate information referred to in Article 42a of the VAT Act,
 - d. binding excise duty information referred to in Article 7d(1) of the Excise Duty Act,
- 6) tax settlements of the taxpayer in territories or countries applying harmful tax competition indicated in executive acts issued pursuant to Article 11j(2) of the CIT Act

and pursuant to Article 23v(2) of the PIT Act, as well as in the announcement of the minister competent for public finance issued pursuant to Article 86a § 10 of the Tax Ordinance,

- excluding commercial, industrial, professional or production process secrets.

The Port Północny is a company that operates a terminal in the Port of Gdansk specializing in the transshipment of bulk goods – in particular coal and iron ore. The company belongs to the Sea-Invest Group, which is a leader in port transshipments in Europe and Africa. The combination of a strategic location with excellent technical equipment enables efficient and fast transshipment of large volumes of cargo and makes the Port Północny terminal a strategic link in the bulk cargo transport chain for the industrial sector. Given that the Company, as a business entity, operates on a large scale, it is necessary to establish in its organizational structures activities to ensure the proper performance of the obligations imposed on it by the provisions of tax law.

Tax burdens are a significant item in the Company's financial settlements. The Company has applied and continues to use a strategy which is a set of principles that have guided and continue to be followed by the Port Północny with regard to tax burdens. Compliance with them is aimed at ensuring effective and consistent management of tax governance, tax risk, human resources and organization in the scope of the tax function, as well as tax documentation and data, as well as IT systems supporting the operation of individual areas.

In its operations, the Company is guided by the principles of honesty and due diligence, also in the field of taxes.

The Company's objective is to take steps to comply with tax law by implementing mechanisms aimed at ensuring the proper performance of tax obligations and timely payment of public law receivables. The Company does not carry out any activities that are part of the so-called tax optimization and aimed at tax avoidance, as well as those that increase tax risk and may in any way lead to a reduction in the state budget or local government units. The Company's undertaking of business activities is preceded by a thorough verification of their tax consequences, which results in non-undertaking / withdrawal from undertakings generating tax risks.

The priority in the scope of tax settlements of the Company and the Group is tax security, understood as minimizing the risk of tax arrears and the risk of sanctions under special regulations.

3. Information on the processes and procedures used by the Taxpayer to manage the performance of obligations arising from the provisions of tax law and to ensure their proper performance

The Company, as an entity conducting business activity, being both a taxpayer and a payer of individual taxes, fulfils its obligations in accordance with the provisions of tax law. As a rule, the taxpayer fulfils its tax obligations on time, including the payment of taxes. In the event of a delay, corrective actions are immediately taken, i.e. compliance with the obligation or correction and, if necessary, payment/additional payment of the tax liability with interest. The Company shall exercise due diligence to ensure that such situations do not recur in the future.

A number of procedures applicable to the performance of obligations arising from the provisions of tax law and ensuring their proper performance, as well as internal practices having an indirect impact on the performance of these obligations, apply to the Company's business activities. These include, in particular:

- *Procedure defining the scope of responsibility for the performance of tasks related to the settlement of tax liabilities,*
- *Internal procedure for reporting tax schemes*
- *Procedure for exercising due diligence by the Company's employees as purchasers of materials, goods and services in domestic and foreign transactions;*
- *Organizational Regulations of the Company,*
- *Ordinance of the President of the Management Board of the Company on the introduction of e-invoices and electronic orders.*

The internal procedures implemented by the Company are adequate to the structure of the Port Północny, the size and subject of operations, including the economic sector and the scale of domestic and foreign transactions.

4. Information on voluntary forms of cooperation with the National Revenue Administration used by the Port Północny

In the fiscal year, the Company did not use voluntary forms of cooperation with the National Tax Administration.

5. Information on the fulfilment of tax obligations by the Port Północny in the territory of the Republic of Poland, together with information on the number of information provided to the Head of the National Tax Administration on tax schemes referred to in Article 86a § 1 point 10 of the Tax Ordinance, with a breakdown by tax, to which they relate

The Company is a Polish tax resident and fulfils its tax obligations in accordance with the law, also with respect to taxes and fees other than CIT, i.e. in particular in the following areas:

- VAT
- PIT (as a payer),
- real estate tax,
- tax on civil law transactions,

- tax on means of transport,
- withholding tax (as a payer).

During the Tax Year, the Port Północny made every effort to properly shape tax settlements and relations with the National Tax Administration and other tax authorities, to provide the necessary information and to maintain transparency in the tax area. In the Tax Year, the Company did not identify the reportable events as information on tax schemes referred to in Article 86a § 1 item 10 of the Tax Ordinance, and thus did not provide the Head of the National Tax Administration with information on tax schemes in the Tax Year.

6. 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 accounting regulations, determined on the basis of the Company's last approved financial statements, including entities that are not tax residents of the Republic of Poland

In the fiscal year, the Company executed 3 transactions with related parties within the meaning of Article 11a(1)(4) of the Corporate Income Tax Act, the value of which exceeded 5% of the balance sheet total of assets within the meaning of accounting regulations, determined on the basis of the last approved financial statements.

7. Information on planned or undertaken restructuring activities by the taxpayer that may affect the amount of tax liabilities of the taxpayer or related entities within the meaning of Article 11a(1)(4) of the CIT Act

In the fiscal year, the Company did not undertake any restructuring activities that could affect the amount of tax liabilities of the Company or its affiliates within the meaning of Article 11a(1)(4) of the CIT Act.

8. Information on applications submitted by the Company for the issuance of:

- a) general tax ruling referred to in Article 14a § 1 of the Tax Ordinance,
- b) interpretation of tax law provisions referred to in Article 14b of the Tax Ordinance,
- c) binding rate information referred to in Article 42a of the VAT Act,
- d) Binding Excise Information referred to in Article 7d(1) of the Excise Duty Act.

The Company did not file any application in the Tax Year for the issuance of:

- a) general tax ruling referred to in Article 14a § 1 of the Tax Ordinance;
- b) interpretation of tax law provisions referred to in Article 14b of the Tax Ordinance,
- c) binding rate information referred to in Article 42a of the VAT Act,
- d) Binding Excise Information referred to in Article 7d(1) of the Excise Duty Act.

9. Information on the Company's tax settlements in territories or countries applying harmful tax competition indicated in executive acts issued pursuant to Article 11j(2) of the CIT Act and pursuant to Article 23v(2) of the PIT Act, as well as in the

announcement of the minister competent for public finance issued pursuant to Article 86a § 10 of the Tax Ordinance

In the Tax Year, the Company did not make any tax settlements in the 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 PIT Act, as well as in the announcement of the minister competent for public finance issued pursuant to Article 86a § 10 Tax Ordinance. Furthermore, the Company is not and has never been registered as a taxpayer in any of the aforementioned territories or countries.