

INFORMATION ON THE IMPLEMENTED TAX STRATEGY FOR 2021

1. List of terms

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

Abbreviation	Definition/description
FY	Fiscal year starting on 1 January and ending on 31 December
Company, ETS	of Ergo Technology & Services S.A.
ERGO/Munich Re Group	The international group to which the Company belongs.
"PDOP Act".	The Act on Corporate Income Tax of 15 February 1992 (consolidated text: Dz. U. of 2021, item 1800, as amended);
Tax Ordinance	Act of 29 August 1997 - Tax Ordinance (consolidated text of 2021, item 1540 as amended)

Introduction

The document outlines how the Company implemented its tax strategy in 2021.

ETS, as a corporate taxpayer with revenues in excess of €50 million in the tax year ending 31 December 2021, is required to prepare and publish information on its ongoing tax strategy for the tax year ending 31 December 2021.

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 comprehensive IT systems for business. It also specialises 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 at the insurance sector.

ETS specialises 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 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	Ul. Leona Droszyńskiego 24 80-381 Gdańsk
Identifying data	KRS: 0000438903, NIP (Tax ID): 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 2021)	924

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 advisers 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 Revenue 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. The proceedings are pending.

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

In 2021, 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 a 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 Revenue Administration, broken down by the taxes to which they relate

In 2021, the Company provided the Head of the National Revenue Administration with information on the tax scheme referred to in Article 86a par. 1 item 10 of the Tax Ordinance concerning the cross-border merger with Ergo Digital IT GmbH. The tax law provisions applicable in the scheme are corporate income tax, value added tax and the Tax Ordinance.

Information on transactions with related parties

In 2021, 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 for two related entities based in Poland,
- the provision of IT services to a related entity based in Poland and a related entity 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

On 4 January 2021, a cross-border merger of technology companies Atena Usługi Informatyczne i Finansowe S.A. (now ETS) with ERGO Digital IT GmbH (Merger) took place.

The acquiring company was Atena Usługi Informatyczne i Finansowe S.A., a Polish joint stock company with its registered office in Sopot (the "Acquiring Company"). The acquired company is ERGO Digital IT GmbH, a German limited liability company based in Germany.

The merger of the acquiring company with the acquired company was effected by transferring all the assets of ERGO Digital IT GmbH to Atena Usługi Informatyczne i Finansowe S.A. (i.e. merger by acquisition). As a result of the Merger, the Acquiring Company assumed all rights and obligations of the Acquired Company on the Merger Date.

The merging companies had the same shareholder, ERGO Technology & Services Management AG, Düsseldorf.

As of the merger date, i.e. 4 January 2021, the name of the Acquiring Company was changed from Atena Usługi Informatyczne & Finansowe S.A. to ErgoTechnology & Services S.A.

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

In 2021, the Company did not make tax settlements in territories or countries applying harmful tax competition, as indicated in the executive acts issued on the basis of Article 11j(2) of the Corporate Income Tax Act of 15 February 1992 and Article 23v(2) of the Personal Income Tax Act of 26 July 1991 and in the announcement of the Minister responsible for public finance issued on the basis of Article 86a par. 10 of the Tax Ordinance.

Information on requests submitted by the Company

In 2021, the ETS did not request:

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