



Bank Polski

Information on the
implemented tax strategy
for 2020

Powszechna Kasa
Oszczędności Bank Polski
Spółka Akcyjna Tax Group

This document is only a translation
of the original in Polish.

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1. General information

1.1. LEGAL BASIS FOR PREPARATION OF THE INFORMATION

The information on the implemented tax strategy of the Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna Tax Group for 2020 (hereinafter: PGK information on the implemented tax strategy) was prepared in order to fulfil the obligation imposed on taxpayers by Article 27c of the Act on Corporate Income Tax.

1.2. TAX GROUP

The Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna Tax Group¹ (hereinafter: PGK PKO Banku Polskiego S.A. or PGK) was established on 5 November 2018 by:

- PKO Bank Polski S.A. (hereinafter: PKO BP or the Bank) as the parent company,
- PKO Bank Hipoteczny S.A. (hereinafter: PKO BH) and
- PKO Leasing S.A. (hereinafter: PKO Leasing).

The establishment of PGK allows the consolidation of income of PKO BP, PKO BH and PKO Leasing (hereinafter: Companies) for the purposes of corporate income tax and enables the use of operational facilitations addressed to tax groups as provided for in the provisions of the Act on Corporate Income Tax. PGK PKO Banku Polskiego S.A. was established for a period of 3 fiscal years, starting from 1 January 2019.

1.3. ACTIVITIES OF THE PGK COMPANIES

PKO BP is a universal deposit and credit bank which services both Polish and foreign individuals, legal persons and other entities. The Bank's activities include, inter alia, holding and trading cash in foreign currencies, as well as conducting foreign exchange and foreign currency transactions, opening and maintaining bank accounts in banks abroad, as well as depositing foreign currency in those accounts.

PKO BH is a mortgage bank that specializes in granting housing mortgage loans to individual customers and also purchases receivables under such loans from PKO BP. The primary objective of PKO BH in terms of financing is the issuance of mortgage covered bonds, which are to serve as the main source of long-term financing of housing mortgage loans.

PKO Leasing is engaged in the business of financial and operating leasing and financial lending.

1.4. THE GROUP

PKO BP is the parent in the Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna Group (hereinafter: Group), which operates in the territory of the Republic of Poland and, through the Bank's subsidiaries, in the territory of Ukraine, Sweden and Ireland, as well as in the form of the Bank's foreign branches: in the Federal Republic of Germany (Branch in Germany), the Czech Republic (Branch in the Czech Republic) and the Slovak Republic (Branch in Slovakia).

The Group offers mortgage loans, provides specialist financial services in the areas of leasing, factoring, debt collection, investment funds, pension funds and insurance, and provides other services, including: car fleet management, transfer agent, provision of technology solutions, outsourcing of IT specialists and support for business run by other entities, and also manages real estate.

¹ Taxpayer's details: Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna Tax Group, Tax ID No (NIP): 1080022799

2. Processes, procedures and voluntary forms of cooperation with the National Revenue Administration bodies

Legal basis: Article 27c(2)(1)(a) and (b) of the Act on Corporate Income Tax:

Information on the implemented tax strategy includes information on:

- a) the processes and procedures for managing the fulfilment and ensuring the correct fulfilment of obligations under tax law,
- b) voluntary forms of cooperation with the National Revenue Administration bodies applied by a taxpayer.

2.1. PKO BP

Supervision over the Finance and Accounting Division at PKO BP, including the Tax Department, is exercised by the Vice-President of the Management Board of PKO BP. The Tax Department, together with other relevant units of the Bank, is responsible for fulfilling tax obligations and ensuring that the tasks relevant to the Bank's tax obligations are properly performed by other units of the Bank.

PKO BP has implemented and applies internal regulations to ensure that its tax obligations are properly fulfilled and transactions are properly documented. In this respect, the basis for the Bank's activities include: resolutions of the Management Board of PKO BP concerning: the principles of fulfilment of tax obligations, tax scheme reporting (MDR) and compliance with obligations concerning transfer pricing. Based on the above resolutions, directors of the relevant functional divisions issued decisions concerning:

- settlement of individual taxes by the Bank as a taxpayer and tax remitter (including those related to foreign branches of PKO BP,
- fulfilment of information duties,
- MDR tax scheme reporting²,
- meeting transfer pricing obligations,
- fulfilment of obligations under FATCA³ and CRS⁴.

Internal regulations are regularly reviewed and updated to ensure their compliance with generally applicable laws.

Independently, in 2021, the Management Board of PKO BP adopted, in the form of a resolution, the Tax Strategy of PKO BP, which was subsequently approved by the Supervisory Board.

The process of fulfilling tax obligations of PKO BP is covered by the internal control system in accordance with the provisions of the Banking Law. As part of the control activities, individual units of PKO BP are subject to periodic verification covering issues concerning the fulfilment of tax obligations, the purpose of which is to ensure that these units, including the Tax Department, correctly fulfil the tasks entrusted to them.

Fulfilment of tax obligations at the Bank is a separate process, which is subject to assessment in terms of int. al. operational and compliance risk. The so-called tax risk appetite at PKO BP is low. The Bank limits activities when it is not possible to eliminate the tax risk using legally permissible tools.

In order to ensure reliable and timely fulfilment of tax obligations:

- 1) the Bank raises employees' tax awareness by providing them with information on applicable tax laws, their planned amendments and interpretation, including through:
 - periodic information on amendments to the tax law, individual tax rulings and general interpretations of tax laws, as well as the decisions of administrative courts;
 - specialist training and guidelines for the employees;
- 2) the Bank conducts ongoing analyses of the tax implications of new products, the Bank's business processes, investment projects and contracts; these activities are taken by qualified employees, including tax advisors;

² *Mandatory Disclosure Rules*

³ *Foreign Account Tax Compliance Act*

⁴ *Common Reporting Standard*

- 3) the Bank analyzes and mitigates its tax risk, using available instruments, including, but not limited to, individual tax rulings and securing opinions; where necessary, PKO BP also uses the assistance of external tax advisors;
- 4) the Bank uses IT applications and strives to automate tax processes; an important part of the tax process is the use of electronic means of communication, both in contacts with tax authorities and with customers;
- 5) the Bank is actively involved in legislative initiatives; among other things, it participates in consulting bills as part of public consultations within the limits of the laws in force in Poland, and takes other initiatives to create an effective, but fair tax system in Poland;
- 6) the Bank avoids the use of structures intended for aggressive tax planning or tax evasion (including tax havens) and avoiding solutions that are contrary to the intention of the legislator or the spirit of the law (the principle of tax honesty).

A key element of the process of fulfilling tax obligations at PKO BP is maintaining high standards in relations with tax authorities, which are based on the principles of fairness and transparency. To this end:

- contacts with tax authorities, including the National Revenue Administration bodies, are based on the principle of mutual trust and are implemented in a professional and transparent manner;
- the obligations arising from generally applicable tax laws are fulfilled in an honest and careful manner, meeting the deadlines stipulated by the law;
- in the course of the tax proceedings and tax audits, the Bank is proactive and provides precise and comprehensive responses.

PKO BP is not a party to a cooperation agreement or a prior pricing arrangement.

2.2. PKO BH

Supervision over the Finance and Accounting Office is exercised by the Vice-President of the Management Board of PKO BH. The Finance and Accounting Office, together with other relevant organizational units of PKO BH, is responsible for the fulfilment of tax obligations and ensuring that the tasks relevant to the tax obligations of PKO BH are properly performed by other units of PKO BH.

PKO BH has implemented and applies internal regulations to ensure that its tax obligations are properly fulfilled and transactions are properly documented. The basis for PKO BH's activities in this respect are resolutions of the Management Board of PKO BH concerning: the principles of fulfilment of tax obligations, tax scheme reporting (MDR) and compliance with obligations concerning transfer pricing. Based on the above resolutions, the director of the Finance and Accounting Office issued decisions concerning:

- settlement of individual taxes by PKO BH as a taxpayer and tax,
- fulfilment of information duties,
- MDR tax scheme reporting,
- meeting transfer pricing obligations.

Internal regulations are periodically reviewed and updated, so that they comply with generally applicable legislation.

Independently, in 2021, the Management Board of PKO BH adopted, in the form of a resolution, the Tax Strategy of PKO BH, which was subsequently approved by the Supervisory Board.

The process of fulfilling tax obligations of PKO BH is covered by the internal control system in accordance with the provisions of the Banking Law. As part of the control activities, individual organizational units of PKO BH are subject to periodic verification covering issues concerning the fulfilment of tax obligations, the purpose of which is to ensure that these units, including the Finance and Accounting Office, correctly fulfil the tasks entrusted to them.

Fulfilment of tax obligations at PKO BH is a separate process, which is also subject to assessment in terms of int. al. operational and compliance risk. The so-called tax risk appetite at PKO BH is low. PKO BH limits activities when it is not possible to eliminate the tax risk using legally permissible tools.

In order to ensure reliable and timely fulfilment of tax obligations:

- 1) PKO BH raises employees' tax awareness by providing them with information on applicable tax laws and their planned amendments;

- 2) PKO BH conducts ongoing analyses of the tax implications of new products, business processes of PKO BH, contracts;
- 3) PKO BH analyzes and mitigates its tax risk, using available instruments such as individual tax rulings; where necessary, PKO BH also uses the assistance of external tax advisors;
- 4) PKO BH uses IT tools; an important part of the tax process is the use of electronic means of communication in contacts with tax authorities;
- 5) PKO BH is actively involved in legislative initiatives through, among other things, participation in thematic forums of business organizations and forums established at the Minister of Finance;
- 6) PKO BH avoids the use of structures intended for aggressive tax planning or tax evasion (including tax havens) and avoiding solutions that are contrary to the intention of the legislator or the spirit of the law (the principle of tax honesty).

A key element of the process of fulfilling tax obligations at PKO BH is maintaining high standards in relations with tax authorities, which are based on the principles of fairness and transparency. To this end:

- contacts with tax authorities, including the National Revenue Administration bodies, are based on the principles of mutual trust and are implemented in a professional and transparent manner;
- the obligations arising from generally applicable tax laws are fulfilled in an honest and careful manner, meeting the deadlines stipulated by the law;
- in the course of the tax proceedings and tax audits, PKO BH is proactive and provides precise and comprehensive responses.

PKO BH is not a party to a cooperation agreement or a prior pricing arrangement.

2.3. PKO LEASING

Supervision over the Accounting and Finance Division is exercised by the Vice-President of the Management Board of PKO Leasing. The tasks related to the definition and implementation of the tax policy of PKO Leasing are performed within the designated division by the Accounting Department and the Tax Team within its structure.

At PKO Leasing, the policy for fulfilling obligations arising from tax law are governed by the procedures introduced by resolutions of the Management Board, which describe the processes related to settlements of PKO Leasing. These procedures relate to:

- settlement of individual taxes,
- MDR tax scheme reporting,
- meeting transfer pricing obligations.

The procedures are regularly updated and adapted to changing tax regimes.

In order to ensure reliable and timely fulfilment of tax obligations:

- 1) PKO Leasing raises employees' tax awareness by providing them with information on applicable tax laws and, their planned amendments;
- 2) PKO Leasing conducts ongoing analyses of the tax implications of new products, business processes of PKO Leasing, contracts;
- 3) PKO Leasing analyzes and mitigates its tax risk, using available instruments, including in particular individual tax rulings; where necessary, PKO Leasing also uses the assistance of external tax advisors;
- 4) PKO Leasing uses IT tools; an important part of the tax process is the use of electronic means of communication in contacts with tax authorities;
- 5) PKO Leasing is actively involved in legislative initiatives as part of, among other things, participation in thematic forums of business organizations;
- 6) PKO Leasing avoids the use of structures intended for aggressive tax planning or tax evasion (including tax havens) and avoiding solutions that are contrary to the intention of the legislator or the spirit of the law (the principle of tax honesty).

PKO Leasing is not a party to a cooperation agreement or a prior pricing arrangement.

2.4. PGK

Additionally, the detailed manner of fulfilment of tax obligations by PGK as a corporate income taxpayer, and in particular the tasks of individual companies comprising PGK, and the deadlines for their completion, are set out in the “Agreement between the companies comprising the Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna Tax Group”⁵.

3. Fulfilment of tax obligations and filing of reports on tax schemes

Legal basis: Article 27c(2)(2) of the Act on Corporate Income Tax:

Information on the implemented tax strategy includes information on a taxpayer’s fulfilment of tax obligations in the territory of the Republic of Poland together with information on the number of reports on tax schemes filed with the Head of the National Revenue Administration, as referred to in Article 86a § 1(10) of the Tax Ordinance, broken down into taxes to which they apply.

3.1. TAX OBLIGATIONS⁶

Taking into account the generally applicable provisions of tax law, including the provisions of the European Union law and ratified international agreements, PGK and the Companies comprising it make every effort to comply with their corporate social responsibility for timely payment of taxes in amounts determined in accordance with the binding regulations and reflecting the results of the activities conducted. PGK is one of the largest corporate income tax payers in Poland. The tax due for 2020 amounted to PLN 1,294 million. PKO BP and PKO BH are also taxpayers of tax on certain financial institutions, which for 2020 amounted to:

- PLN 957 million in PKO BP,
- PLN 89 million in PKO BH.

The companies comprising PGK, are also value added tax taxpayers (the highest liability in this respect for 2020 was paid by PKO Leasing: PLN 78 million), local taxes, including in particular vehicle tax (the highest liability in this respect for 2020 was paid by PKO Leasing: PLN 43 million), tax on civil law transactions, excise duty, as well as customs duties and stamp duty. In discharging their obligations as tax remitters under the Act on Personal Income Tax and the Act on Corporate Income Tax, the Companies properly calculate, withhold and remit tax, and also submit the information required by tax law.

PGK and the Companies make every effort to timely submit tax returns, declarations and information required by tax law. Additionally, PKO BP and PKO BH identify and provide information about customers who are US taxpayers or residents of other countries under FATCA and CRS, respectively. The Companies also comply with their obligations under transfer pricing regulations. In this respect, the Bank, as the parent in the Group, prepares group transfer pricing documentation and information on the group entities (CBC-R⁷).

3.2. REPORTS ON SCHEMES

Information on the number of reports on tax schemes filed in 2020 by PKO BP, PKO BH and PKO Leasing with the Head of the National Revenue Administration⁸, broken down into taxes to which they apply:

3.2.1. PKO BP

The Bank, while exercising due diligence, filed reports on tax schemes and complied with other obligations under tax law regarding tax scheme reporting (MDR). The reports on tax schemes (MDR-1 form) filed in 2020

⁵ Agreement separate from the Tax Agreement of the Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna Tax Group concluded in the form of a notarial deed and registered by the Head of the Second Mazovian Tax Office.

⁶ Tax amounts as at 1 December 2021.

⁷ *Country-by-Country Report*

⁸ For the purpose of preparing the Information on the implemented tax strategy, PGK assumed that the number of reports on tax schemes filed with the Head of the National Revenue Administration equalled the number of submitted MDR-1 forms.

by the Bank resulted mainly from the identification of the so-called other specific hallmarks⁹ (due to the high volumes of transactions executed by the Bank in its business operations) and the prudence that the Bank follows in fulfilling its tax and information obligations. They did not apply to cross-border tax schemes, and the Bank acted as a user.

List of MDR-1 forms submitted by the Bank to the Head of the National Revenue Administration in 2020, including supplements.

Tax	Numer
Corporate income tax	14
Personal income tax	1
Tax on civil law transactions	1
Total	16

The Bank received confirmations of the assignment of tax scheme numbers for the MDR-1 reports filed in 2020, excluding the MDR-1 report concerning tax on civil law transaction (as at 1 December 2021, there was no position of the Head of the National Revenue Administration in this respect).

3.2.2. PKO BH

In 2020, PKO BH did not file reports on tax schemes (MDR-1) due to the fact that no new tax schemes were identified. At the same time, PKO BH fulfilled other obligations under tax law concerning tax scheme reporting (MDR).

3.2.3. PKO LEASING

In 2020, PKO Leasing provided the Head of the National Revenue Administration with one MDR-1 report concerning tax on civil law transactions. However, the arrangement indicated in the MDR-1 form did not constitute a tax scheme referred to in Article 86a § 1(10) of the Tax Ordinance, so the Head of the National Revenue Administration refused to assign it a tax scheme number. At the same time, PKO Leasing fulfilled other obligations under tax law concerning tax scheme reporting (MDR).

4. Related party transactions

Legal basis: Article 27c(2)(3)(a) of the Act on Corporate Income Tax:

Information on the implemented tax strategy includes information on transactions with related parties within the meaning of Article 11a(1)(4), 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 last approved financial statements of the company, including with parties which are not tax residents of the Republic of Poland.

4.1. TRANSFER PRICING POLICY

The companies comprising PGK: PKO BP, PKO BH and PKO Leasing apply transfer pricing policies on an arm's length basis. As the parent of the PKO Bank Polski S.A. Group, PKO BP prepares group transfer pricing documentation and information on the group entities (CBC-R). In transactions concluded with related parties, within the meaning of Article 11a section 1(4) of the Act on Corporate Income Tax (hereinafter: related parties), PKO BP, PKO BH and PKO Leasing apply the arm's length principle, i.e. they determine prices

⁹ Other specific hallmarks referred to in Article 86a § 1(1) of the Tax Ordinance do not result from the European Union law and were introduced into the national legal order at the initiative of the Polish legislator. A sufficient prerequisite for the Bank to identify other specific hallmarks of a tax scheme is the exceeding of the transaction or tax amount thresholds set forth in the aforementioned provision.

at a level which would be applied between non-related entities and verify them using one of the following methods: the comparable uncontrolled price method, cost plus, profit split method, resale price method, and the transactional net margin method. If none of these methods can be used, they apply other methods, including the valuation technique, which is the most appropriate in the given circumstances.

4.2. INFORMATION ON TRANSACTIONS

Information on transactions¹⁰ of PKO BP, PKO BH and PKO Leasing, the value of which in 2020 exceeded, respectively, 5% of the balance sheet total of assets within the meaning of accounting regulations, determined on the basis of the last approved financial statements of a given Company, concluded by PKO BP, PKO BH and PKO Leasing with parties related to them, including with parties which are not tax residents of the Republic of Poland

4.2.1. PKO BP

The Bank did not carry out any related party transactions, whose value exceeded 5% of the balance sheet total of its assets, including with parties which are not tax residents of the Republic of Poland.

4.2.2. PKO BH

Related party transactions that exceeded 5% of the balance sheet total of PKO BH assets in 2020 concerned:

- three working capital overdraft facilities granted by PKO BP; as at 31 December 2020, the total value of credit limits was PLN 6,500 million (each of these 3 facilities separately exceeds 5% of the balance sheet total of assets);
- purchase of portfolios of receivables under mortgage-secured housing loans in the amount of PLN 342 million from PKO BP in 2020, with simultaneous repayment of the liability for the purchase of receivables in the amount of PLN 2,400 million, plus accrued interest;
- a guarantee agreement, whereunder PKO BP, as the Guarantor, accepted the obligation to acquire, on its own account up to PLN 2,000 million, PKO BH bonds issued under the Bond Issue Programme.

More information on the above transactions is described in the Financial statements of PKO Bank Hipoteczny S.A. for the year ended 31 December 2020, available at: <https://www.pkobh.pl/raporty/raporty-okresowe/>.

4.2.3. PKO LEASING

Related party transactions that exceeded 5% of the balance sheet total of PKO Leasing assets in 2020 involved:

- working capital facility granted by PKO BP; as at 31 December 2020, the credit limit was, respectively, for each currency: PLN 10,844 million, EUR 709 million and USD 40,845 million;
- overdraft facility granted by PKO BP; as at 31 December 2020, the credit limit was PLN 2,500 million;
- bank guarantees issued by PKO BP to the lenders of PKO Leasing, i.e., inter alia, to: the European Investment Bank (EIB), the Council of Europe Development Bank (CEB), the European Bank for Reconstruction and Development (EBRD), the International Financial Corporation (IFC) or Bank Gospodarstwa Krajowego (BGK); as at 31 December 2020, the total amount of guarantees issued by PKO BP to the lenders of PKO Leasing was PLN 2,265 million.

Financial information on related party transactions is presented in the separate financial statements of PKO Leasing S.A. for 2020, available at: <https://www.pkoleasing.pl/o-nas/sprawozdania-finansowe/>.

¹⁰ For the purpose of preparing the Information on the implemented tax strategy, the transaction and transaction value are determined, respectively, in accordance with the rules and criteria taken into account by the individual Companies comprising PGK for the preparation of local transfer pricing documentation and information on transfer pricing (TPR-C).

5. Restructuring measures¹¹

Legal basis: Article 27c(2)(3)(b) of the Act on Corporate Income Tax:

Information on the implemented tax strategy includes information about restructuring measures planned or undertaken by a taxpayer, which may affect the amount of tax liabilities of the taxpayer or related parties within the meaning of Article 11a(1)(4).

In 2020, the following companies merged: PKO Leasing Nieruchomości sp. z o.o. as the acquired company and PKO Leasing as the acquiring company, and ZenCard sp. z o.o. as the acquired company and PKO BP Finat sp. z o.o. as the acquiring company.

Moreover, the liquidation of Molina spółka z ograniczoną odpowiedzialnością 3 S.K.A. was completed, and Molina spółka z ograniczoną odpowiedzialnością 5 S.K.A. and Molina spółka z ograniczoną odpowiedzialnością 6 S.K.A. were put into liquidation.

At the beginning of July 2020, in connection with the closing of the securitization of lease receivables of PKO Leasing carried out in cooperation with the special purpose vehicle ROOF Poland Leasing 2014 DAC, PKO Leasing commenced operational activities related to the liquidation of this special purpose vehicle.

On 14 January 2021: "CENTRUM HAFFNERA" sp. z o.o. as the acquired company and its subsidiary "Sopot Zdrój" sp. z o.o., as the acquiring company, merged (reverse merger). The change was recorded in the National Court Register of the acquiring company. After the merger, NEPTUN - fizan holds 62,944 shares in "Sopot Zdrój" sp. z o.o., with a total nominal value of PLN 31,472 thousand, which represent 72.98% of the company's share capital and entitle to 72.98% of votes at the Shareholders' Meeting.

With respect to entities based in Ukraine, in 2020 works on ownership changes commenced; they culminated in July 2021 with the acquisition of Finansowa Kompania "Idea Kapitał" sp. z o.o. (subsidiary of KREDOBANK S.A.) by Finansowa Kompania "Prywatne Inwestycje" sp. z o.o. (indirect subsidiary of NEPTUN-fizan based in Poland).

6. Requests for interpretation and binding information

Legal basis: Article 27c(2)(4) of the Act on Corporate Income Tax:

Information on the implemented tax strategy includes information about a taxpayer's requests for the issuance of:

- a) a general interpretation referred to in Article 14a § 1 of the Tax Ordinance,
- b) an 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 Act on Value Added Tax,
- d) binding excise information referred to in Article 7d(1) of the Act of 6 December 2008 on excise duty (Journal of Laws of 2020, items 722 and 1747).

6.1. REQUESTS FOR GENERAL INTERPRETATIONS

Neither PGK nor any of the Companies comprising it submitted a request for a general tax interpretation referred to in Art. 14a § 1 of the Tax Ordinance.

¹¹ For the purpose of preparing the Information on the implemented tax strategy, restructuring measures include information on mergers of companies, transformation of a company into another company, contribution to a company in the form of a company's enterprise or its organized part (including as part of the division of the company) and exchange of shares.

6.2. REQUESTS FOR INDIVIDUAL RULINGS

6.2.1. PGK

PGK submitted 7 requests for an interpretation of tax law provisions referred to in Article 14b of the Tax Ordinance as regards corporate income tax; they concerned:

- tax deductible expenses (4 requests),
- tax base and tax amount (2 requests),
- taxation of the parties to a leasing agreement (1 request).

6.2.2. PKO BP

The Bank:

- 1) submitted 14 requests for an interpretation of tax law provisions referred to in Article 14b of the Tax Ordinance; they concerned:
 - a) corporate income tax in the context of:
 - transfer pricing (1 request),
 - tax base and tax amount (3 requests),
 - tax deductible expenses (2 requests);
 - b) personal income tax in the context of:
 - objective exemption (1 request),
 - source of revenue (3 requests);
 - c) value added tax in the context of:
 - objective exemption (3 requests),
 - tax deduction and refund (1 request);
- 2) submitted 1 request for an interpretation of tax law provisions referred to in Article 14b of the Tax Ordinance, that concerned all of the following issues:
 - a) corporate income tax in the context of tax deductible costs,
 - b) personal income tax in the context of the object and subject of taxation and withholding of tax or tax advances by remitters,
 - c) value added tax in the context of the supply of goods and services;
- 3) was a party to the proceedings in the case of 3 joint requests referred to in Article 14r of the Tax Ordinance, concerning value added tax (with respect to objective exemption) and tax on civil law transactions (with respect to the object of taxation).

6.2.3. PKO BH

PKO BH did not submit requests for an interpretation of tax law provisions referred to in Article 14b of the Tax Ordinance.

6.2.4. PKO LEASING

PKO Leasing submitted 7 requests for an interpretation of tax law provisions referred to in Article 14b of the Tax Ordinance; they concerned:

- a) corporate income tax in the context of:
 - taxation of the parties to a leasing agreement (1 request),
 - tax deductible expenses (2 requests),
 - sources of revenue (1 request);
- b) value added tax in the context of:
 - objective exemption (1 request),
 - the scope of taxation (1 request),
 - tax base (1 request).

6.3. REQUESTS FOR BINDING RATE INFORMATION

None of the Companies comprising PGK requested the issuance of binding rate information referred to in Article 42a of the Act on Value Added Tax.

6.4. REQUESTS FOR BINDING EXCISE INFORMATION

None of the Companies comprising PGK requested the issuance of binding excise information referred to in Article 7d section 1 of the Act on excise duty.

7. Settlement in tax havens

Legal basis: Article 27c(2)(5) of the Act on Corporate Income Tax:

Information on the implemented tax strategy includes information concerning tax settlements made by a taxpayer in the territories or countries applying harmful tax competition indicated in the implementing acts issued pursuant to Article 11j(2) and Article 23v(2) of the Act of 26 July 1991 on Personal Income Tax Act and in the announcement of the minister competent for public finance issued pursuant to Article 86a § 10 of the Tax Ordinance.

Neither PGK nor any of the Companies comprising it made any tax settlements in territories or countries applying harmful tax competition indicated in the implementing acts issued pursuant to Article 11j(2) of the Act on Personal Income Tax Act and in the announcement of the minister competent for public finance issued pursuant to Article 86a § 10 of the Tax Ordinance.

List of referenced acts:

Act on Corporate Income Tax - Act of 15 February 1992 on Corporate Income Tax (consolidated text: Journal of Laws of 2021.1800, as amended)

Act on Personal Income Tax - Act of 26 July 1991 on Personal Income Tax (consolidated text: Journal of Laws of 2021.1128, as amended)

Act on Value Added Tax - Act of 11 March 2004 on Value Added Tax (consolidated text: Journal of Laws of 2021.685, as amended)

Tax Ordinance - Act of 27 August 1997 – Tax Ordinance (consolidated text: Journal of Laws of 2021.1540, as amended)

Banking Law act - Act of 29 August 1997 – Banking Law (consolidated text: Journal of Laws of 2020.1896, as amended)

Act on excise duty - Act of 6 December 2008 on excise duty (consolidated text: Journal of Laws of 2020.722, as amended)