



**Information on the implemented tax strategy for the 2023 tax year prepared  
pursuant to Article 27c of the Act of Corporate Income Tax**

**Prochem S.A.  
ul. Łopuszańska 95  
02-457 Warszawa  
NIP 113 00 10 523, KRS 0000019753**

## 1. General information

Company Prochem S. A. registered in the National Court Register (KRS) under KRS number 0000019753 conducts activities at the following address: ul. Łopuszańska 95, 02-457 Warszawa, NIP 1130010523, REGON 012532360. Principal activity according to Polish Business Classification (PKD 2007) determines symbol 7112Z engineering activities and related technical consulting. According to Warsaw Stock Exchange classification the company belongs to construction sector.

PROCHEM specializes in designing and implementing construction investments. PROCHEM's sectors of activity include:

- Manufacturing plants
- Oil and gas sector
- Process installations
- Power industry sector
- General construction
- Environmental protection sector

The scope of the conducted activities includes:

- Pre-investment activities
- Multi-discipline design
- Project execution
- Project execution management

The information on the implemented tax strategy for the tax year from January 1, 2023 to December 31, 2023 (hereinafter referred to as the "Information") prepared by Prochem S.A. is intended to fulfil the obligation imposed on the Company, according to which taxpayers whose revenues in the previous tax year exceeded EUR 50 million are obliged to prepare this Information.

Information on the implemented tax strategy for the tax year from January 1, 2023 to December 31, 2023 has been prepared in accordance with the requirements of Art. 27c of the Act of Corporate Income Tax of February 15, 1992 (Journal of Laws of 2023, item 2805, as amended).

## 2. Information on the implemented tax strategy

### *Tax processes and procedures*

Prochem S.A. complies with tax law regulations and duly fulfils the obligations imposed on the Company by tax law regulations. The tax policy implemented by the Company is aimed at supporting key business decisions and ensuring compliance with the law of concluded transactions.

Tax obligations are fulfilled by designated employees of the Company, who have the necessary knowledge and skills to ensure the proper performance of obligations arising from tax law. These persons constantly monitor changes in tax law regulations and familiarize themselves with the case law of tax authorities and courts in order to ensure the proper performance of obligations arising from tax law regulations.

The Management Board and management staff of Prochem S.A. ensure effective and adequate control of the organization in terms of fulfilling the obligations imposed by tax law through the use of internal processes and procedures for controlling the transactions carried out, in particular:

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- exercises due diligence to ensure the correctness of tax settlements;
- places emphasis on verifying its contractors and business partners in terms of their registered office and business location;
- makes decisions to reduce tax risk by minimizing threats from the external and internal environment;
- organizes ongoing staff training in the field of tax law, conducted by specialists;
- undertakes all necessary actions to correctly determine and pay tax liabilities on time.

The submitted tax declarations, tax information and tax settlements constitute a full reflection of the Company's business activities in the territory of the Republic of Poland.

The processes related to tax determination and payment carried out by the Company include, among others:

- collecting documents on the basis of which the tax base is calculated;
- calculation of the tax base;
- tax calculation;
- declaring a tax liability by submitting an appropriate tax return or paying due advance payment;
- timely payment of tax due.

***Voluntary forms of cooperation with the National Revenue Administration bodies***

In contacts with the National Revenue Administration bodies, the Company demonstrates openness and willingness to cooperate, and provides all explanations and required information in a timely manner.

In 2023, the Company did not undertake any formal voluntary forms of cooperation with the National Revenue Administration bodies, i.e. it did not participate in the Cooperation Program.

***Fulfilment of tax obligations, including information on tax schemes***

In 2023, the Company fulfilled tax obligations as a taxpayer or payer, including among others in relation to the following taxes:

- corporate income tax;
- personal income tax;
- goods and services tax.

The Company takes all necessary actions to correctly determine and timely pay public law liabilities, i.e.:

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- identifies events that give rise to tax obligations;
- calculates and pays corporate income tax advances on time;
- submits monthly JPK-VDEK files and settles the tax liability for goods and services tax, or possibly requests the transfer of the VAT surplus to subsequent settlement periods;
- acts as a payer of personal income tax, pays the due liability in this respect within the statutory deadlines and sends information and declarations to the relevant tax offices within the statutory deadlines;
- constantly verifies obligations related to the possible payment of salaries to non-residents;
- prepares local tax documentation;
- monitors the occurrence of tax schemes and, if such an obligation occurs, reports transactions on the appropriate forms.

In 2023, the Company did not identify any tax schemes referred to in Article 86a § 1 item 10 of the Tax Ordinance, and therefore did not provide any information on tax schemes to the Head of the National Revenue Administration.

In 2023, the Company did not file any applications for a general tax interpretation, individual tax law interpretation, binding rate or excise tax information.

### ***Related party transactions***

According to the Company's financial statements for the 2023 tax year, the carrying amount total of assets amounted to PLN 114,654 thousand. In the 2023 tax year, the Company entered into one transaction with a related entity, the value of which exceeded 5% of the carrying amount of assets.

Irydion Sp. z o. o. with its registered office in Warsaw (Resident)

Loan received – EUR 3,540 thousand, value in PLN = PLN 15,392 (after conversion into PLN at the average NBP exchange rate of 31.12.2020).

The transactions referred to in part hereby of the Information are understood as single transactions between related entities, and not only controlled transactions within the meaning of art. 11a sec. 1 item 6 of the Act of CIT. At the same time, it should be noted that the transactions referred to above were not aggregated within the meaning of the definition of controlled transactions of a homogeneous nature.

### ***Restructuring activities planned or undertaken***

In the 2023 tax year, the Company did not undertake any restructuring activities that could affect the amount of tax liabilities of the Company or its related entities, and does not plan to undertake such activities in the future.

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### ***Tax settlements in tax heavens***

In 2023, for which information on the implemented tax strategy is prepared, the Company did not make any tax settlements in territories or countries constituting harmful tax competition, in so-called tax heavens.