

Information on the implemented tax strategy For the fiscal year 1 January to 31 December 2022.

The information was prepared by:

Tatra Spring Polska Sp. z o.o.

08-400 Garwolin, ul. Trakt Lwowski 155, hereinafter referred to as the "Entity".

Legal basis for the preparation of the Information: art. 27c of the Act on Corporate Income Tax of 15 February 1992 (Journal of Laws of 2022, item 2587, as amended).

General information about the entity with regard to the nature, type and size of its activities

Tatra Spring Polska Sp. z o.o. was established on 12.06.2008. The entity's share capital as at 31.12.2022 was PLN 50,000, divided into 100 shares of PLN 500 each and fully subscribed by COSMINT S.p.A., based in Italy. Cosmint S.p.A has been part of the Intercos Group since 2017, a world leader in the development and production of contract cosmetic products. The entity is engaged in its core business of service-oriented cosmetics production, including the packaging of cosmetic products, perfumery products and the production of nail varnishes on behalf of large multinationals. The entity does not have its own brands. The Company has implemented the ISO 9001 quality management system and GMP 22716. as at 31.12.2022. The Unit employed 309 people on a contract of employment. Due to

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ul. Trakt Lwowski 155 08-400 Garwolin, Poland

NIP PL8262117983 REGON 141454000

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the specific nature of its operations, the Unit also uses employees hired by a temporary employment agency and subcontractors. During periods of increased productivity, the Unit employs an additional 350 people. Successively, the Entity also increases its managerial staff and hires key employees on production lines. As at 31.12.2022, the assets and liabilities of Tatra Spring Polska Sp. z o.o. showed an amount of PLN 150,141,918.37. In 2022, sales revenue amounted to PLN 263,215,205.83 and a 45% increase was recorded compared to the previous year.

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

The Unit performs its obligations under tax law (in the capacity of a taxpayer and tax payer) with the utmost diligence, with a view to correctly determining the amount of tax liabilities (other public law benefits of a tribute nature) and other legal obligations (reporting, information and other obligations). The Unit's employees engaged in the performance of tax obligations are obliged to verify the settlements made, taking into account published tax interpretations, tax explanations, judgments, professional press and other sources of knowledge. The assumption of making tax settlements by the Entity is the correct and non-optimising performance of legal obligations. With the above principles in mind, the Entity in particular:

- employs a team of staff with high professional qualifications, dedicated to the application of tax law (with a view also to ensuring a scale of employment that takes into account the nature, type and size of its activities), and
- uses the services of specialised entities (in particular tax advisers) to support its own staff in the performance of the legal obligations imposed on the Unit.

Re 1. Describe tax clearance jobs - organisational structure:

- Chief Accountant - a person responsible for settlement of CIT, PCC (if an activity subject to this tax is performed), local taxes, including real estate tax (currently not present in the Unit's practice), Deputy Chief Accountant - person responsible for accounting for VAT and withholding tax - WHT (in cooperation with the Finance Director), Environmental Manager - the person responsible for clearing excise duty,
- Senior HR Specialist/ HR Manager in the HR department- the person responsible for PIT clearance.

Re 2 External entities supporting the Entity in the performance of its tax obligations: The Entity continuously uses 8 tax consulting companies. The support consists of activities initiated by the service providers (e.g. so-called post-tax alerts sent on a regular basis) and advice provided on behalf of the Unit, depending on the needs that arise. The selection of the consulting firm is motivated by the professional specialisations of the individual service providers.

Tax settlements and the performance of other tax obligations are subject to internal control. It is carried out through the activities of employed persons, also in co-ordination with external companies. In both variants, verification activities are performed by a designated person inside the Unit, which are additionally supervised by that person's superior.

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

In the year covered by the Information, the Unit did not use any voluntary forms of cooperation with the authorities of the National Tax Administration (in particular, the Unit did not conclude: an agreement on cooperation with the Sze-fem KAS, a prior price agreement, etc.).

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Information on the taxpayer's fulfilment of tax obligations on the territory of the Republic of Poland, together with information on the number of information on tax schemes referred to in Article 86a § 1 item 10 of the Tax Ordinance, provided to the Head of the National Fiscal Administration, with a breakdown by the taxes to which they relate.

1. The entity discharged its tax obligations for the following tax titles in the year under review:
2. Activities performed as a taxpayer:
 - corporate income tax (accounted for at the stage of advance payments made on the so-called simplified principles - Art. 25 para. 6 et seq. CIT and shown in the annual settlement; the entity submitted tax return CIT-8 for the tax year 2022),
 - value added tax (settled on a monthly basis; in 2022 the Entity filed tax returns for 12 months of 2022),
 - performance of excise tax obligations (the Entity is a registered excise tax payer, submitting quarterly declarations
3. Activities performed in the capacity of payer:
 - Personal income tax (employee and other settlements covered by PIT-11 information and disbursements declared in form PIT-8ARI The entity filed a PIT4R return for the tax year),
 - Withholding tax (WHT) - The entity pays benefits from various titles subject to Article 21 CIT. The entity, as a payer, pays benefits from various titles applying relevant provisions of international agreements on avoidance of double taxation and Polish law. The entity has the documents necessary for proper settlement of WHT (certificates of residence, declarations of actual beneficiaries, etc.). The entity has submitted the following withholding tax information/declarations for 2022: IFT-2R.

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 assets within the meaning of the accounting regu-

lations, determined on the basis of the last approved financial statement of the company, including entities which are not tax residents of the Republic of Poland

2022- 7,507,095.92 Sale of core services by the Company to INTERCOS EUROPE S.P.A.. - PLN 22.3 million.

2021 - 5,184,629.69 - Sale of core services by the Company to INTERCOS EUROPE S.P.A. - 9.2 million PLN

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).

In the year covered by the Information, the Entity did not plan or undertake restructuring activities that could affect the tax liability of the taxpayer or the Entity's related parties.

Information on applications submitted by the taxpayer for: general tax interpretation referred to in Article 14a § 1 of the Tax Ordinance.

The Unit did not make the aforementioned requests in the year covered by the Information.

Information on applications submitted by the taxpayer for the issuance of interpretations of tax law provisions referred to in Article 14b of the Tax Ordinance.

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The Unit did not make the aforementioned requests in the year covered by the Information.

Information on applications submitted by the taxpayer for: binding rate information referred to in Article 42a of the Value Added Tax Act.

The Unit did not make the aforementioned requests in the year covered by the Information.

Information on applications submitted by the taxpayer for the issuance of: binding excise information referred to in Article 7d(1) of the Excise Duty Act of 6 December 2008 (Journal of Laws of 2022, item 143, 1137, 1488, 1967, 2180 and 2236).

The Unit did not make the aforementioned requests in the year covered by the Information.

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, section 2 and on the basis of Article 23v, section 2 of the Personal Income Tax Act of 26 July 1991 and in the announcement of the Minister competent for public finance issued on the basis of Article 86a § 10 of the Tax Ordinance.

The entity did not make the aforementioned settlements in the year covered by the Information.

TATRA SPRING POLSKA Sp. z o.o.
Krzysztof Michalik

General Manager

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