

Information on the implemented tax strategy for the tax year from 1 January to 31 December 2023.

Prepared by: Tatra Spring Polska Sp. z o.o. 08-400 Garwolin, ul. Trakt Lwowski 155, hereinafter: the 'Entity'.

Legal basis for preparing the Information: Article 27c of the Corporate Income Tax Act of 15 February 1992 (Dz. U. [Journal of Laws] of 2023, item 2805, as amended).

## **General information about the Entity as regards the nature, type and size of its operations**

Tatra Spring Polska Sp. z o.o. was established on 12.06.2008. As of 31 December 2022, the Entity's share capital amounted to PLN 50,000 and was divided into 100 shares with a nominal value of PLN 500 apiece, held in full by COSMINT S.p.A. based in Italy. Since 2017, Cosmint S.p.A. has been part of the Intercos Group, a global leader in the development and contract manufacturing of cosmetic products. The Entity's core business consists in manufacturing cosmetics, including also market preparation of cosmetic and perfumery products as well as manufacturing nail varnish for large international corporations. The Entity does not have its own brands. The Company implemented an ISO 9001 Quality Management System and Good Manufacturing Practices (GMP) 22716. As of 31 December 2023, the Entity had 306 employees under employment contracts. Due to the nature of its business, the Entity also uses employees recruited by temporary employment agencies or subcontractors. During high-production periods, the Entity takes on about 350 additional employees. The Entity has also been steadily increasing its management staff and hiring key employees on the production lines. As of 31 December 2023, Tatra Spring Polska Sp. z o.o.'s assets and liabilities totalled PLN 139,289,218.42. In 2023, sales revenues totalled PLN 254,610,092.74, down by 3% as compared to the previous year. Gross profit for 2023 amounted to 19,818,758.70. Income tax base: PLN 29,990,284.21. Corporate tax for 2023: 5,698,154.00. The Shareholder's Meeting, which was held on 6 March 2023, adopted a resolution to keep the financial result of PLN 25.3 million in the Company as undistributed net profit. A dividend payout of PLN 13.5 million was proposed.

## **Information on the processes and procedures applied by the taxpayer in managing the obligations arising from tax regulations and ensuring their correct implementation.**

The Entity fulfils its obligations under tax law (as both a taxpayer and tax bearer) with the utmost diligence, aiming for the correct determination of tax liabilities (and other public-law payments) as well as other legal obligations (such as reporting and informational duties). Employees of the Entity responsible for fulfilling tax obligations are required to verify completed settlements, taking into account published tax interpretations, guidance, rulings, industry press, and other sources of information. The Entity's approach to tax settlements focuses on accurate and compliant fulfilment of its legal obligations, without engaging in tax optimisation practices. In line with these principles, the Entity specifically:

- employs a highly qualified workforce for the application of tax law (also ensuring the scale of employment reflects the nature, type, and scope of its business activities), and
- uses specialised entities (in particular, tax advisors) to support its internal workforce in meeting the legal obligations imposed on the Entity.

Ad 1 Description of positions handling tax settlements – organisational structure:

- Chief Accountant – responsible for settling CIT, PCC (if any activities subject to this tax are performed), local taxes, including property tax (which currently does not apply to the Entity's operations),
- Deputy Chief Accountant – responsible for VAT settlements and withholding tax (WHT) (in cooperation with the Finance Director),
- Environmental Protection Manager – responsible for settling excise duty,
- Senior HR Specialist/HR Manager – responsible for PIT settlements.

Ad 2 External entities supporting the Entity in fulfilling its tax obligations: The Entity engages external tax advisory firms. The support includes initiatives from service providers (e.g., regular 'tax alerts') as well as advisory

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Share capital paid-up in full – PLN 50,000.00

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services provided at the Entity's request, as necessary. The selection of the advisory firm depends on the expertise of each service provider.

Tax settlements and the fulfilment of other tax obligations are subject to internal control. The latter is carried out through the activities of the employed personnel, and also in coordination with external firms. In both scenarios, verification activities are performed by a designated individual within the Entity, who is additionally supervised by their superior.

### **Information on the tax payer's voluntary forms of cooperation with the authorities of the National Revenue Administration.**

In the year covered by this Information, the Entity did not engage in any voluntary forms of cooperation with the authorities of the National Revenue Administration (in particular, the Entity did not enter into a cooperation agreement with the Head of the NRA, an advance pricing agreement, or any similar arrangements).

### **Information regarding the fulfilment of tax obligations by the taxpayer in the territory of the Republic of Poland, along with information on the number of reports submitted to the Head of the National Revenue Administration concerning tax schemes, as mentioned in Article 86a § 1 point 10 of the Tax Ordinance, broken down by the relevant taxes.**

In the year covered by this information, the Entity fulfilled its tax obligations in relation to the following types of taxes:

1. Activities performed as a taxpayer:

- Corporate Income Tax (calculated through advance payments made under simplified rules – Article 25(6) and subsequent of the CIT, and reported in the annual settlement; for the tax year 2023, the Entity submitted the CIT-8 tax return),
- Value Added Tax (settled on a monthly basis; in 2023, the Entity submitted tax returns for all 12 months of the year),
- Excise duty obligations (the Entity is a registered excise taxpayer, submitting quarterly AKC-KZ declarations).

2. Activities performed as a tax bearer:

- Personal Income Tax (employee-related settlements and other payments reported in PIT-11 and payments declared in the PIT-8AR form; the Entity submitted a PIT4R declaration for the tax year),
- Withholding Tax (WHT) – The Entity makes payments subject to Article 21 of the CIT. As a tax bearer, the Entity makes various payments in accordance with the applicable provisions of international double taxation treaties and Polish law. The Entity holds the necessary documents for correct WHT settlements (residence certificates, declarations by beneficial owners, etc.). For the year 2023, the Entity submitted the following WHT-related information/declarations: IFT-2R.

3. Other activities: preparation of transfer pricing documentation and TPR information.

### **Information on transactions with related entities as defined in Article 11a(1)(4), whose value exceeds 5% of the total balance sheet assets as defined by accounting regulations, determined based on the most recently approved financial statement of the company, including entities that are not tax residents of the Republic of Poland.**

PLN 22,436,171.57 sale of core services by the Company to INTERCOS EUROPE S.P.A.

PLN 2,564,505.21 purchase of support services from Cosmint SpA

PLN 4,367,866.17 purchase of agency services from Cosmint SpA

**Information on restructuring measures planned or undertaken by the taxpayer which may affect the tax liabilities of the taxpayer or of related parties within the meaning of Article 11a(1)(4).**

In the year covered by this Information, the Entity did not plan or undertake any restructuring measures that could affect the tax liabilities of the taxpayer or of parties related to the Entity.

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

In the year covered by this Information, the Entity did not submit any such applications.

**Information on applications submitted by the taxpayer for the issuance of a tax law interpretation as referred to in Article 14b of the Tax Ordinance.**

In the year covered by this Information, the Entity did not submit any such applications.

**Information on applications submitted by the taxpayer for the issuance of: a binding rate information as referred to in Article 42a of the VAT Act.**

In the year covered by this Information, the Entity did not submit any such applications.

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

In the year covered by this Information, the Entity did not submit any such application.

**Information regarding the taxpayer's tax settlements in territories or countries applying harmful tax competition, as indicated in the implementing acts issued under Article 11j(2) and Article 23v(2) of the Personal Income Tax Act of 26 July 1991, as well as in the announcement of the minister responsible for public finance issued under Article 86a § 10 of the Tax Ordinance.**

In the year covered by this Information, the Entity did not issue any such settlements.

~~TATRA SPRING POLSKA Sp. z o.o.~~  
Krzysztof Michalik  
25/10/2025  
General Manager

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