

## **INFORMATION ON THE TAX STRATEGY**

carried out in the fiscal year  
closed on 31 December 2023

**OKECHAMP SPÓŁKA AKCYJNA**

## Abbreviations

<i>Abbreviation</i>	<i>Name</i>
Company, Okechamp S.A.	Okechamp S.A.
CIT law	Law of 15 February 1992 on corporate income tax (consolidated text, Journal of Laws of 2023 item 2805 as amended)
CIT tax or CIT	Corporate income tax
PCC tax PCC	Civil law translations tax
PIT tax or PIT	Personal income tax
VAT tax or VAT	Value-added tax
Head of KAS	Head of the National Revenue Administration
MDR	Mandatory Disclosure Rules concerning the obligation to disclose (report) information on tax schemes to the Head of the National Revenue Administration

## I. Introduction

### Purpose of the information

The purpose of the information on the Company's tax strategy is to fulfil the obligation established in art. 27c of the CIT law, pursuant to which the information on the tax strategy carried out for the given fiscal year must be prepared and made public by CIT taxpayers who generated revenues in the given fiscal year exceeding EUR 50 million. As the taxed revenues of the Company for the fiscal year closed on 31 December 2023 exceeded said limit, the Company has drafted this report and is making it public.

This information is drafted for the Company's fiscal year, which opened on 1 January and closed on 31 December 2023 (hereinafter: **FY23**).

### About the Company

Okechamp S.A. is one of the global leaders and the Polish leader in manufacturing and processing mushrooms. The Company's operations involve the following:

- Manufacturing substrates and casings in Poland;
- Cultivating and processing mushrooms in Poland;
- Logistics and selling mushrooms.

The Company's business model is based on a vertical integration of the value creation chain, which means that manufacturing safety is controlled at every stage until the processing and delivery of the finished product to the shelf in commercial chains throughout the world.

Okechamp S.A. is also the owner of the OLE! brand, a major entity on the vegetable and mushroom snack market.

The manufacturing operations of the Company are conducted at the Substrate Factory and Mushroom Plants in Borucino and the Production Plant in Grodzisk Wielkopolski. The Company's headquarters and its Commercial, Financial, HR, and IT departments are located in Poznań.

## II. Information on the fulfilled tax strategy

### 1.1. Applied tax processes and procedures

In order to ensure compliance of its operation with the provisions of the tax law and proper management and legal fulfilment of the obligations dictated by the provisions of the tax law, the Company enforces tax processes and procedures adapted to its size and structure, i.e. the following:

1. **tax strategy**, which covers the Company's tax policy, tax risk management standards, approach to planning taxes, and relations with fiscal authorities (hereinafter: **Strategy**);
2. **tax processes and procedures enforced by the Company**, which specify the standards established in the Strategy towards chosen specific tax obligations of the Company and the areas of its operations and cover diverse activities related with settling taxes, both written and not. Said processes and procedures include the following:

- a) Proper accounting of business events creating or not creating tax obligations and responsibilities.
- b) Proper establishment of events resulting from accounting of tax settlements.
- c) Proper fulfilment of formal responsibilities, including submission of required statements, declarations, tax information's, notifications, reports, and other required documents.
- d) Proper enforcement of effective tax rates.
- e) Proper qualification of business events in scope affecting tax obligations and responsibilities.
- f) Proper collection and preparation of documents required directly by the provisions of the tax law.
- g) Proper collection and preparation of documents required indirectly by the provisions of the tax law but affecting preservation of due diligence in order to properly fulfil tax obligations.
- h) MDR obligations (so-called MDR procedure).
- i) Other required unwritten sets of behaviours reflected in the Company's organisational culture, which must be continuous and consolidated in order to ensure proper fulfilment of tax obligations.

## **1.2. Agreement on cooperation with the Head of KAS**

The Company is not party to the agreement on cooperation with the Head of KAS. Throughout FY23, the Company did not request:

- a) advance pricing arrangement (APA),
- b) protective tax rulings,
- c) opinions on application of preferences in scope of tax at source,
- d) Investment Agreement (so-called interpretation 590),
- e) VAT Cross-Border Ruling (CBR).

The Company was also not party to the Mutual Agreement Procedure (MAP).

Simultaneously, in the event of contacts with the National Revenue Administration, the Company is open to transparent cooperation and offering the required clarifications and information at the appropriate times.

**2. Selected main obligations of the Company in Poland dictated by the provisions of the tax law, including MDR**

**2.1. Information concerning tax obligations to be fulfilled by the taxpayer within the territory of Poland**

	Type of tax		Information on whether the Company fulfils obligations in scope of the given tax
<u>Direct taxes</u>	CIT	Taxpayer	YES
		Withholding agent	YES
	PIT	Taxpayer	NO
		Withholding agent	YES
<u>Indirect taxes</u>	VAT		YES
	EXCUSE		NO
	CUSTOMS TAX		YES
	PCC		NO
<u>Local taxes</u>	Real estate tax		YES
	Means of transport tax		YES
	Forestry tax		NO
	Agricultural tax		YES

**2.2. MDR**

*Information of tax schemes submitted to the Head of KAS in the fiscal year covered by the information on fulfilment of the Tax Strategy involving the Company as a promoter, user, or supporter, including distribution of taxes*

In 2023, the Company did not disclose any tax scheme information to the Head of the National Revenue Administration.

**3. Information on transactions with affiliates to value exceeding 5% of the balance sheet total and restructuring operations planned or undertaken by the Company with potential impact on the tax obligations of the Company or its affiliates within the fiscal year covered by this Tax Strategy information**

<p><b>Transactions of the Company with affiliates to value exceeding 5% of the balance sheet total</b></p>	<p>The Company carried out the following transactions with affiliates to value exceeding 5% of the balance sheet total within the time covered by this information:</p> <ul style="list-style-type: none"> <li>a) Procuring financing;</li> <li>b) Granting a guarantee;</li> <li>c) Procuring a guarantee.</li> </ul> <p>Details of the aforementioned transactions are confidential.</p>
<p><b>Information on restructuring operations planned or undertaken by the Company with potential impact on the tax obligations of the Company or its affiliates</b></p>	<p>The company did not conduct (nor did it intend to conduct) any restructuring operations with potential impact on the tax obligations of the Company or its affiliates within the time covered by this information.</p>

**4. Information on requests for general tax interpretations, individual tax interpretations, binding rate information (WIS), and binding excise information (WIA) made by the taxpayer**

**4.1. General tax interpretations**

The Company did not request any general tax interpretations in the fiscal year covered by this Tax Strategy information.

**4.2. Individual tax interpretations**

The Company did not request any individual tax interpretations in the fiscal year covered by this Tax Strategy information.

**4.3. Binding rate information (WIS)**

The Company did not request any binding rate information in the fiscal year covered by this Tax Strategy information.

#### **4.4. Binding excise information (WIA)**

The Company did not request any binding excise information in the fiscal year covered by this Tax Strategy information.

#### **5. Information on tax settlements in countries or territories practicing harmful tax competition**

List of countries practicing harmful tax competition in accordance with the Regulation of the Minister of Finances of 28 March 2019 on establishment of countries and territories practicing harmful tax competition in scope of corporate income tax (Journal of Laws 2019 item 600).

**The tax systems of the following countries and territories are practicing harmful tax competition:**

- 1) Principality of Andorra;
- 2) Anguilla – Overseas Territory of the United Kingdom of Great Britain and North Ireland;
- 3) Antigua and Barbuda;
- 4) Sint Maarten, Curaçao – countries of the Kingdom of the Netherlands;
- 5) Kingdom of Bahrain;
- 6) British Virgin Islands – Overseas Territory of the United Kingdom of Great Britain and North Ireland;
- 7) Cook Islands – Independent Territory with political links to New Zealand;
- 8) Commonwealth of Dominica;
- 9) Grenada;
- 10) Sark – Dependency of the British Crown;
- 11) Hong Kong – Special Administrative Region of the People's Republic of China;
- 12) Republic of Liberia;
- 13) Macau – Special Administrative Region of the People's Republic of China;
- 14) Republic of Maldives;
- 15) Republic of the Marshall Islands;
- 16) Republic of Mauritius;
- 17) Principality of Monaco;
- 18) Republic of Nauru;
- 19) Niue – Independent Territory with political links to New Zealand;
- 20) Republic of Panama;
- 21) Independent State of Samoa;
- 22) Republic of Seychelles;
- 23) Saint Lucia;
- 24) Kingdom of Tonga;
- 25) U.S. Virgin Islands – Unincorporated Territory of the United States;
- 26) Republic of Vanuatu

List of countries and territories reluctant to cooperate for tax purposes pursuant to the announcement of the Minister of Finance of 28 February 2024 on establishment of the list of countries and territories listed in the European Union's list of jurisdictions reluctant to cooperate for tax purposes assumed by the Council of the European Union not included in the list of countries and territories practicing harmful tax competition issued based on the provisions on personal income tax and the provisions on corporate income tax, including the date of adoption of said list by the Council of the European Union (Journal of Laws of 2024 item 185).

**Countries reluctant to cooperate for tax purposes:**

- 1) Republic of Fiji;
- 2) Guam;
- 3) Republic of Palau;
- 4) Republic of Trinidad and Tobago;
- 5) Russian Federation
- 6) American Samoa



The Company did not settle any taxes in the aforementioned countries and territories practicing harmful tax competition in the fiscal year preceding this Tax Strategy information.