

Expeditors Polska sp. z o.o.  
ul. Żwirki i Wigury 16B  
02-092 Warszawa  
Tax ID: 5222736891  
REGON: 01571527900000  
National Court Register no.: 0000201043

## **Information on the executed tax strategy for 2021**

This Information is intended to fulfill the obligation imposed on Expeditors Polska Sp. z o.o. (hereinafter: "Expeditors Polska") by the provision of art. 27c of the Corporate Income Tax Act (Journal of Laws 2021.1800 consolidated text as amended). The information presented below relates to the main assumptions of Expeditors Polska's internal tax strategy and its implementation for the full calendar tax year ended 31 December 2021.

### **1. Description of Expeditors Polska's activities**

Expeditors Polska was registered in the National Court Register on 23 March 2003 under the number 0000201043 by the District Court for the Capital City of Warsaw, 13th Commercial Division of the National Court Register.

Expeditors Polska has a share capital of PLN 50.000. The owner of 100% of Expeditors Polska's shares is Expeditors International of Washington, Inc. (100 shares with a par value of PLN 500 each).

Expeditors Polska's main business is the operation of other transportation agencies, classified under PKD (Polish Classification of Activities) code 52.29.C.

Expeditors Polska's other activities includes:

- 49. 41. Z, Road transport of goods
- 52. 24. A, Transshipment of goods in seaports
- 52. 24. C, Transshipment of goods at other transshipment points
- 52. 10. B, Warehousing and storage of other goods
- 52. 29. A, Activities of maritime transport agencies

As part of its business activities, Expeditors Polska offers logistics solutions such as air, ocean and road transportation, distribution services and customs brokerage, and other ancillary services to customers. The above services are offered mainly to customers operating in international trade.

## **2. Expeditors Polska's processes and procedures for managing the performance of its obligations under tax law and ensuring proper implementation**

Correct tax filing and tax settlement is important to Expeditors Polska not only for reasons of tax security and avoidance of costs associated with incorrect tax filings (overassessments, interest on tax arrears and penalties), but also from the perspective of the principles of social justice and corporate social responsibility.

The tax processes occurring at Expeditors Polska are carried out in such a way as to allow for proper tax filing and settlements. In the tax processes taking place at Expeditors Polska, special emphasis is placed on:

- correct archiving and recording of documents,
- correct calculation of tax liabilities,
- proper preparation and timely filing of all tax returns that Expeditors Polska is required to file,
- timely payment of taxes, and
- detection and elimination of errors.

In order to properly implement tax processes in Expeditors Polska, the following tax procedures, formally unwritten but applied in-practice, were in operation in 2021:

- verification of contractors (including using the whitelist of VAT taxpayers),
- application of the VAT split payment method
- proper filing and settlement of taxes for which Expeditors Polska is a taxpayer or remitter.

## **3. Information on voluntary forms of cooperation with the National Tax Administration authorities applied by Expeditors Polska**

Expeditors Polska's ongoing tax strategy involves cooperation with the National Tax Administration authorities based on building positive relationships and transparency, to ensure the provision of full and reliable information on Expeditors Polska's tax filings.

In 2021 Expeditors Polska did not undertake any formal voluntary forms of cooperation with the National Tax Administration authorities.

**4. Information with respect to Expeditors Polska's implementation of tax obligations in the Republic of Polska, including information on the tax schemes provided to the Head of National Tax Administration, broken down by the taxes to which they relate**

Expeditors Polska was subject to unlimited corporate income tax liability in 2021. Expeditors Polska made advance payments of income tax by the statutory deadline, and also filed a return for the tax year and paid the tax due by the statutory deadline. Expeditors Polska acted as a withholding tax agent in 2021. Expeditors Polska calculated, withheld and paid the tax due to the relevant tax office within the statutory deadline. Expeditors Polska also filed corporate income tax returns and information required by law (i.e. CIT-10Z, IFT-2R, CIT-8, CIT-ST).

Expeditors Polska is an active taxpayer of Value Added Tax (VAT), and as such it settled its accounts with the relevant tax authority in accordance with the provisions of the VAT Act. In particular, Expeditors Polska complied with its obligations to submit returns and information in a timely manner. In compliance with the VAT Act, Expeditors Polska also filed amended/corrected VAT declarations in 2021.

In addition, Expeditors Polska acted as a withholding tax agent for personal income tax. Accordingly, Expeditors Polska paid the tax collected within the statutory deadline and submitted the declarations and information, required by the regulations, to the relevant tax office.

Expeditors Polska was not subject to obligations as a withholding tax agent or as a taxpayer with respect to other taxes (specifically, real estate tax, agricultural tax, forestry tax, transportation tax, excise tax, tax on civil law transactions).

Expeditors Polska was not subject to and did not declare other taxes in 2021 constituting income of the state budget or local government.

**5. Information on transactions with related parties (within the meaning of Article 11a.1.4. of the Corporate Income Tax Act) where the value of such transactions exceeds 5% of total assets within the meaning of the accounting regulations, determined on the basis of the last approved financial statements of Expeditors Polska, including entities that are not tax residents of the Republic of Polska**

Expeditors Polska did not make any individual transactions with related parties in 2021, where the unit value of such transaction exceeded the above-mentioned amount.

However, the total value of all transactions made with related parties within the meaning of Article 11a.1.4 of the CIT Act exceeds 5% of the balance sheet total assets within the meaning of the accounting regulations, as determined on the basis of Expeditors Polska's financial statements for 2021.

## **Revenue transactions**

Expeditors Polska generated revenue in 2021 primarily from the following categories of transactions with related parties:

- revenues from ocean freight;
- revenues from air freight;
- revenues from additional local fees;
- revenues from additional local costs, documentation.

Transactions were carried out with numerous related parties based in different countries around the world, e.g. USA, Bangladesh, Malaysia, Singapore, Argentina, Cambodia, Canada, Chile, China, Colombia, Dominican Republic, Egypt, Hungary, Italy, Norway, France, Japan, Lithuania.

## **Cost transactions**

Expeditors Polska incurred costs in 2021 primarily from the following categories of transaction with related parties:

- remuneration for a regional IT employee;
- remuneration for the use of software;
- remuneration for the ability to use a trade name;
- remuneration for access to the Expeditors global network of affiliates;
- remuneration for marketing services;
- remuneration for training services;
- registration fees;
- fees for commissions;
- remuneration due to employees and regional managers.

The transactions were carried out with numerous related parties based in different countries around the world, e.g: USA, Bangladesh, Malaysia, Portugal, Singapore, Canada, Chile, Colombia, Denmark, Egypt, Finland, Hungary, United Kingdom, Italy, India, Mexico, Switzerland, Spain, France, Japan, Ireland, Romania, among others.

**6. Information on restructuring activities planned or undertaken by the taxpayer that may affect the tax liabilities of the taxpayer or related entities within the meaning of Article 11a.1.4 of the Corporate Income Tax Act**

Expeditors Polska has not taken, nor does it plan to take, any restructuring actions in the near future.

**7. Information on applications submitted by Expeditors Polska for a general tax interpretation referred to in Article 14a § 1 of the Tax Ordinance**

Expeditors Polska did not submit any requests in 2021 for a general tax ruling under Article 14a § 1 of the Tax Ordinance.

**8. Information on applications submitted by Expeditors Polska for individual tax rulings, referred to in Article 14b of the Tax Ordinance**

Expeditors Polska did not submit any requests in 2021 for individual tax rulings under Article 14b § 1 of the Tax Ordinance.

**9. Information on applications submitted by Expeditors Polska for the binding rate information referred to in Article 42a of the VAT Act**

Expeditors Polska did not submit any requests in 2021 for the binding rate information, as provided for in Article 42a of the VAT Act.

**10. Information on applications submitted by Expeditors Polska for the binding excise information referred to in Article 7d paragraph 1 of the Excise Tax Act of 6 December 2008**

Expeditors Polska did not submit any requests for binding excise information in 2021, as referred to in Article 7d.1 of the Excise Tax Act of 6 December 2008.

**11. Information on Expeditors Polska's tax settlements in territories or countries practicing harmful tax competition indicated in the executive acts issued on the basis of Article 11j.2 of the Corporate Income Tax Act and on the basis of Article 23v.2 of the Personal Income Tax Act, and in the announcement of the Minister responsible for public finance issued on the basis of Article 86a § 10 of the Tax Ordinance.**

Expeditors Polska did not make any tax settlements in territories or countries with harmful tax competition in 2021.