

**Information on the
tax strategy executed
by Acerinox Polska
Sp. z o.o.
in 2020**

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I. Introduction

This report is provided by Acerinox Polska Sp. z o.o. (hereinafter as "Company") to fulfill its obligations under Article 27c of the Act of 15 February 1992 on the Corporate Income Tax (consolidated text: Journal of Laws of 2021, item 1800, as amended).

This information relates to the tax strategy executed by the Company in the tax year 2020.

II. General information

1. Information on the Company

Acerinox Polska Sp. z o.o. with its registered office in Warsaw (address: ul. Daniszewska 23, 03-230 Warsaw, NIP: 5272309599, REGON: 01634996000000) is entered into the register of entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw, 13th Commercial Division of the National Court Register under the KRS number 0000104713.

Acerinox Polska Sp. z o.o. belongs to Acerinox Group, which is one of the primary international groups in the stainless-steel industry and is regarded as one of the most competitive in such industry. The Group has six manufacturing sites and an extensive commercial network active in the five continents. Acerinox Polska Sp. z o.o.'s shareholder is Acerinox, S.A, a Spanish listed company, traded publicly in the largest Spanish Stock Exchange market, Bolsa de Madrid.

The company operates in the field of sales support for the Acerinox Group on the Polish and Czech markets, occasionally also in Slovakia and Hungary, using its warehouse and service center. According to the Polish Classification of Activity (PKD), the subject of economic activity includes, inter alia, manufacture of metals, manufacture of fabricated metal products, except machinery and equipment, wholesale of metals and metal ores, wholesale of metal products. However, Acerinox Polska does not manufacture; it only does if necessary a finish and cutting activity to better serve the clients.

The main customers of the Company on Polish market are steel distributors and processors, as well as customers operating in such industries as construction, industrial equipment, machine construction, electromechanical and electronic products and the steel industry.

2. Strategic objectives of the Company

The company's tax strategy is aimed at ensuring the proper fulfillment of obligations under the tax law. The fulfillment of public law obligations and the necessity to pay the related amounts due to the State Treasury are treated by the Company's authorities as the Company's obligation resulting from its operations in the territory of Poland. The Board and management of the Company ensure effective and adequate control of the organization from the perspective of fulfilling the obligations imposed on the Company by the provisions of the tax law, in particular:

- by exercising due diligence to ensure the correctness of the Company's tax settlements;
- by showing a proactive attitude in terms of indicating values and building the culture of the organization - including in the field of transparency of tax settlements;
- by putting emphasis on the verification of its contractors and business partners; in particular in terms of the place of establishment and business activity;
- by investing in expanding the knowledge of the staff in the field of tax law;
- by making decisions in order to reduce tax risk by minimizing threats from the external and internal environment.

III. Information on the management processes and procedures ensuring the fulfilment of tax obligations and tax compliance implemented by the taxpayer along with the information on the forms of voluntary cooperation with the National Revenue Administration

1. Information on the processes and procedures applied by the taxpayer for managing the performance of obligations under tax law and ensuring their proper performance.

a) Organization of the process of fulfilling obligations resulting from the provisions of tax law

The organization of the process of compliance with tax law obligations in the Company is as follows:

- 1) The Management Board of the Company supervises the implementation of the obligations arising from the provisions of the tax law.
- 2) The fulfillment of obligations under the tax law belongs to the Chief Accountant, who takes appropriate steps to clarify doubts related to the legal and tax qualification of individual economic events.
The fulfillment of the obligations of a personal income taxpayer (on account of remuneration paid to employees) is the responsibility of an external payroll provider.
- 3) Tax calculations are made monthly or annually (depending on the tax) by the Chief Accountant on the basis of verified source documents.
- 4) The Chief Accountant prepares, on the basis of the prepared calculation, tax declarations on the appropriate official forms. In case of exceptional transactions it might also be advised and reviewed by an external Tax advisor
- 5) The Chief Accountant is responsible for submitting the tax returns to the competent tax office and for paying the tax within the statutory deadline.

Documents related to the tax calculation and copies of submitted declarations are archived in an orderly manner both in paper and electronic form on the Company's server.

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

- pays monthly income tax advances,
- pays monthly VAT,
- makes payments for the purchase of statutory goods using the split payment mechanism;
- pays real estate tax monthly;
- performs the obligations of the payer in the personal income tax on remuneration paid to employees, also collects and transfers to the tax office advances for income tax on these persons.

b) Procedures applied

The Group which the Company belongs to and the Company, have procedures in place to ensure that the Company correctly fulfills its obligations under the tax law, taking into account the organizational structure of the Company.

2. Information on voluntary forms of cooperation with the authorities of the National Revenue Administration used by the taxpayer

In the tax year 2020, the Company did not conclude a cooperation agreement with the Head of the National Tax Administration, referred to in Art. 20s of the Tax Code. or an advance pricing agreement referred to in section III of the Act of October 16, 2019 for the settlement of disputes regarding double taxation and the conclusion of an APA (Journal of Laws, item 2200).

Nevertheless, the Company undertakes all necessary forms of cooperation with tax authorities in order to properly fulfill its obligations under the tax law.

IV. Information on the fulfillment of tax obligations by the taxpayer in the territory of the Republic of Poland, along with information on the number of information provided to the Head of the National Revenue Administration on tax schemes, broken down by taxes to which they relate.

1. Information on the fulfillment of tax obligations by the taxpayer

The company takes the necessary measures to correctly and timely fulfill the obligations arising from the provisions of tax law in the territory of the Republic of Poland, in particular:

- identifies the events that create tax obligations;
- calculates and pays the due tax on time to the account of the competent tax office;
- submits to the tax authorities the relevant declarations, lists, statements, reports and information to be submitted by the provisions of tax law,
- prepares local transfer pricing documentation and comparability analysis,
- monitors transactions from the perspective of the provisions of the Tax Code on tax schemes in order to possibly report the arrangement, which is a tax scheme, to the Head of the National Revenue Administration.

In 2020, the Company fulfilled the tax obligations of the payer (collector) resulting from the following taxes:

- personal income tax - on employee remuneration;
- Withholding taxes

2. Information on the number of information on tax schemes provided to the Head of the National Revenue Administration

In the fiscal year 2020, the Company did not identify any arrangements that would have met the tax scheme criterion (MDR), therefore in the above-mentioned period, the Company did not provide information on tax schemes to the Head of the National Tax Administration.

V. Information on transactions with related entities or restructuring activities undertaken by the taxpayer

1. Information on transactions with related entities within the meaning of Art. 11a (1)(4) the value of which exceeds 5% of the balance sheet total of assets within the meaning of the accounting regulations, determined on the basis of the last approved financial statements of the company, including non-Polish tax residents

According to the Company's financial statements for 2020, the balance sheet total of assets amounted to PLN 166,023 thousand.

In 2020, the Company concluded the following transactions with related entities, the value of which exceeds 5% of the balance sheet total of assets:

Counterparty		Goods		Services	Nature of relationship
		Purchase	Sales	Sales	
Acerinox Europa, S.A.U.	Non-resident	211 382 459,00	-	1 315 040,00	Indirect capital
Columbus Stainless Pty Ltd.	Non-resident	135 140 364,00	-	222 176,00	Indirect capital
Roldan, S.A.	Non-resident	22 961 546,00	-	8 103,00	Indirect capital
Inoxidables de Euskadi, S.A.U.	Non-resident	843 916,00	39 065,00	-	Indirect capital
Acerinox Deutschland GmbH	Non-resident	811 023,00	-	35 896,00	Indirect capital
Inoxfil, S.A.	Non-resident	310 781,00	-	16 200,00	Indirect capital
Bahru Stainless, Sdn. Bhd.	Non-resident	-	-	462 693,00	Indirect capital
Total:		371 450 090,00	39 065,00	2 060 108,00	

2. Information on restructuring activities planned or undertaken by the taxpayer that may affect the amount of tax liabilities of the taxpayer or related entities within the meaning of Art. 11a (1)(4)

In the fiscal year 2020, the Company did not plan or undertake any restructuring activities that could affect the amount of tax liabilities of the Company or its related entities, in particular:

- mergers with other companies;
- transformation into another company;
- making a contribution to another company in the form of a company's enterprise or its organized part (including division of the company);
- share exchange.

VI. Information on submitted applications

1. Applications for a general tax interpretation referred to in Art. 14a (1) of the Tax Ordinance Act.

In the fiscal year 2020, the Company did not submit any applications for a general tax interpretation.

2. Applications for an interpretation of tax law provisions referred to in Art. 14b of the Tax Ordinance Act.

In the fiscal year 2020, the Company did not submit any applications for an interpretation of tax law.

3. Applications for the issuance of binding rate information referred to in Art. 42a of the Polish VAT Act.

In the fiscal year 2020, the Company did not submit any applications for a binding rate information.

4. Applications for the issuance of binding excise information referred to in Art. 7d (1) of the Polish Excise Duty Act.

In the fiscal year 2020, the Company did not submit any applications for binding excise duty information.

VII. Information on making tax settlements for the taxpayer in countries applying harmful tax competition

In the fiscal year 2020, the Company did not make tax settlements in territories or countries applying harmful tax competition.