



Gestamp Wrocław Sp. z o.o.  
Tax Management Strategy 31/12/2020

This tax strategy statement applies to Gestamp Wrocław Sp. z o.o.

## Organisational Structure:

Gestamp Wrocław Sp. z o.o., is a company incorporated in Poland. Our parent company, Gestamp Automoción, S.A., is a multi-national company that is incorporated in Spain and listed on the Spanish Stock Exchange, (hereinafter referred as “Gestamp Automoción Group”). Gestamp Wrocław Sp. z o.o. is registered with the Wrocław-Fabryczna District Court, VI Financial Department of the National Court Register, number 17870 Gestamp Wrocław Sp. z o.o. has the tax identification NIP number: 5272108234 and the statistical REGON number: 012971042. The registered office / headquarters of Gestamp Wrocław Sp. z o.o. is located in Wrocław, Eugeniusza Kwiatkowskiego 3.

Gestamp Wrocław Sp. z o.o., as a tier 1 supplier, regularly trades goods and services with Automotive Original Equipment Manufacturers (OEM) and Gestamp Automoción Group companies all over the world.

## Scope:

Polish Law requires Gestamp Wrocław Sp. z o.o. to publish its tax strategy online on an annual basis. Gestamp Wrocław Sp. z o.o.’s Tax Strategy has been hereby published on the website of the Gestamp Automoción Group, available at: <https://www.gestamp.com> in accordance with article 27c of the Act of 15 February 1992 on Corporate Income Tax.

This tax strategy relates to the year ending 31st December 2020.

- Processes and Procedures on dealing with Tax Duties:

Gestamp Wroclaw Sp. z o.o. has a low appetite for taxation risk. When any risks arise they are identified, evaluated and managed proactively. We will seek external advice when there are uncertainties or complexities with any risks that arise. If it is recommended - Gestamp Wroclaw Sp. z o. o. may submit requests for individual tax rulings. In such a case, Gestamp Wroclaw Sp. z o.o. acts in accordance with the obtained rulings until the legal status and facts are up-to-date.

Tax decisions are made at all times in a manner that is in line with Gestamp Automoción Group policy and strategies.

Day to day matters are handled by the Finance and Controlling departments at Gestamp Wrocław Sp. z o.o. along with the Corporate Tax Area and specialist advice sought from qualified tax professionals when required. In addition, the company's Board of Directors works closely with the Corporate Tax Area in order to both set the tax policy and to decide on tax planning matters.

Gestamp Automoción Group and Gestamp Wroclaw Sp. z o.o. in particular, are always seeking to develop their own people in order to improve the quality of our reporting and to minimise risk to the business. In order to ensure the highest professional standard in case of VAT & CIT the company is in touch with the Corporate Tax Area that renders tax services as well as with external tax advisors.

We understand the value of our financial reporting to our management and stakeholders, and we work to provide enhanced, transparent and balanced disclosure of our tax affairs in order to facilitate the information to the management and the relationships with our stakeholders. In doing so we hope to be recognised as a vital business partner by our stakeholders.

In particular, Gestamp Wrocław Sp. z o.o. has procedures in place in order to assure the fulfilment of all the tax obligations required by the tax law. As a matter of example, it has procedures for maintaining due diligence in terms of Polish withholding tax and in the field of verification of contractors for Polish VAT purposes, as well as internal DAC6/MDR procedures aimed at counteracting failure to comply with obligations to report tax-planning schemes. Additionally Gestamp Wrocław Sp. z o. o. uses the reduced 0% VAT rate in intra – community supplies and export transactions.

- **Compliance with tax duties:**

Gestamp Wrocław Sp. z o.o. is committed to complying with all local statutory tax regulations by both the letter of the law and the spirit with which it was written across all the countries that we operate in. Gestamp Wrocław Sp. z o.o. seeks to report tax information and obligation in a timely manner and ensure that the information contained within has integrity. After the fulfilment of tax obligations, Gestamp Wrocław Sp. z o.o. makes the payment of tax liabilities, if they arise from the tax calculation.

At Gestamp Automoción Group we recognise that in Poland we are liable for a broad range of Polish taxes including but not limited to: VAT, Withholding tax, Corporation income tax, Personal income tax.

Gestamp Automoción Group claims properly available tax allowances, deductions, reliefs, incentives, exemptions and credits where available, in all cases in accordance with applicable law.

Gestamp Wrocław Sp. z o.o. has a permit to also conduct the business activity in the Wałbrzych Special Economic Zone and benefits from a tax exemption.

In particular, during FY 2020 Gestamp Wroclaw Sp. z o.o. has complied with the following taxes and taxes obligations:

Tax	Tax obligations	Period		Term
		Monthly	Yearly	
Value Added Tax (VAT)	<u>To September 2020:</u> <ul style="list-style-type: none"> <li>• Declaration VAT-7</li> <li>• JPK VAT</li> <li>• Declartion VAT-UE</li> </ul>	•		25th of each month
	<u>Since October 2020:</u> <ul style="list-style-type: none"> <li>• JPK V7M</li> <li>• Declaration VAT-UE</li> </ul>	•		25th of each month
Corporate Income Tax (CIT)	<ul style="list-style-type: none"> <li>• Declaration CIT-8 with the attachment CIT-8/0, CIT/8S</li> <li>• IFT-2R</li> <li>• ORD-U</li> </ul>		•	March, 31th
Corporate Income Tax (CIT)	<ul style="list-style-type: none"> <li>• CIT -10Z</li> </ul>		•	January, 31th
Personal Income Tax (PIT)	Declaration PIT-4	•		20th of each month
	Declaration PIT-4R		•	January, 31th
Agriculture tax	Declaration to comune office		•	January, 15th
Intrastat	Intrastat declaration	•		10th of each month

In addition, Gestamp Wroclaw Sp. z o.o. has also completed the following Transfer Pricing obligations during FY 2020:

Transfer Pricing Obligations
Local file report
Masterfile report
Statement on transfer pricing
TPR-C form
CbC-P
CbC-R

Finally, in reference to DAC 6 / MDR reporting, Gestamp Wroclaw Sp. z o.o. has not reported to the Head of the National Tax Administration any tax schemes as referred to in article 86a § 1 point 10 of the Tax Ordinance Act.

- **Cooperation with the National Tax Administration:**

An important part of our tax strategy and policies is the maintenance and development of a strong, proactive working relationship with the National Tax Administration. We always seek to be transparent with the National Tax Administration and, in cases of interpretation or complexity, work with them on a real time basis to determine the amount of tax due and asking for advice when dealing with matters open to interpretation. We hope to foster an open and collaborative working relationship with them.

Gestamp Wrocław Sp. z o.o., has not concluded any cooperation agreement under the so-called Cooperation Program.

- **Transactions with related parties:**

Transactions carried out by Gestamp Wrocław Sp. z o.o. with related parties that exceed the 5% of the balance sheet total of assets:

Company	Country	Transactions	Value (PLN)
Gestamp Polska Sp. z o.o.	Poland	Purchase/sale of finished/semi-finished goods	206 767 988,02
		Recharge of expenses	5 125 291,75
Gestamp Automoción, S.A.	Spain	Loan interests	23 276 452,55
		Trademark fees	419 266,04
		Recharge of expenses	36 553,27
Gonvarri Polska Sp. z o.o.	Poland	Purchase of raw materials	58 083 514,82
		Recharge of expenses	3 453,07

- Transactions with related parties (Continued):

The transactions carried out can be defined as follows:

- Purchase/sale of finished/semi-finished goods: Gestamp Wroclaw Sp. z o.o.'s main business activity is the manufacture of parts and accessories for vehicles to sell them to the final client or to group companies. It purchases/sales either subsets to be subsequently incorporated into the production process or finished products when there is a lack of capacity to directly manufacture them.
- Purchase/sale of raw materials: The Gonvarri Group is the main supplier (albeit not the only one) of raw materials, steel cut coils. It is worth highlighting that the purchase price of such raw material is established in the agreements signed by the Gonvarri Group companies and our clients (unrelated to Gestamp Automoción Group), although the product may be first purchased by Gestamp Wroclaw Sp. z o.o. manufacturers to be used in the manufacturing of the product ordered by such client.
- Trademark fees: Gestamp Automoción, S.A. (licensor), as legal owner of the Gestamp brand, grants a trademark license to the manufacturing plants of the group (licensees) in exchange of a royalty payment. The license is granted for the use of the trademark "Gestamp" with the sole purpose of selling/distributing automotive components manufactured, packed and sold by the mentioned manufacturing plants in the territories in which they operate.
- Loan interests: In order to finance the daily activities of the companies of the Gestamp Automoción Group as well as financing certain investments the main instrument used by the Gestamp Automoción Group are ordinary loans which may be granted by different companies within the Gestamp Automoción Group depending on the specific circumstances of each case.
- Recharge of expenses: As usual practice within business groups, synergies are created in relation to the economic activity carried out. Thus, Gestamp Automoción Group entities occasionally incur in expenses on behalf of other companies, and so these expenses are then recharged to the entities directly benefiting from them.



- **Restructuring projects:**

There are not at the moment any restructuring projects planned and/or in force which may affect the amount of the taxpayer's tax liabilities of the related parties.

- **Applications filed by the taxpayer:**

At the moment Gestamp Wroclaw Sp. z o.o., has not filed any applications from the Polish Tax Authorities.

Applications	Yes/No
General Tax ruling	No
Individual Tax ruling	No
Binding rate information	No
Binding excise information	No

- **Tax settlements:**

During FY 2020, there have not been any tax settlements in the jurisdictions pursuing harmful tax competition as listed in the regulations issued under Personal Income Tax and Corporate Income Tax laws and the announcements of the Minister of Finance.

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