

2023- Information on the Realization of the Tax Strategy by Emirates (Rządowa Spółka Handlowa) Oddział w Polsce (Hereinafter: 'The Company').

1. Introduction

The following information is provided in compliance with the requirements of Article 27c of the CIT Act as it applies to Emirates Branch in Poland which is a member of the Emirates group.

The Company has committed to conducting the Emirates group strategy. For this reason, the document has been prepared on the basis of a group-wide tax strategy.

The Emirates group (the "Group") comprises Emirates and dnata. Emirates is a global airline, serving 150 airports in 80 countries from its hub in Dubai, United Arab Emirates. Dnata is one of the largest combined air services providers in the world and the largest travel management company in the UAE. Its main activities are the provision of cargo and ground handling, catering and travel services.

The aim of the Tax Strategy is to reflect and support the business of the Group by ensuring full compliance with tax legislation and regulations in the countries where the Group has operations, mitigating tax risks in a timely and cost-effective manner and by ensuring a sustainable tax rate.

The tax profile of Emirates is predominantly determined by the application of bilateral tax treaties concluded between the UAE and the various countries. These tax treaties, in general, follow the basic principle laid down in article 8 of the OECD Model Treaty, based on which profits derived from the operation of aircraft in international traffic are exclusively taxable in the country of residence of the airliner. In January 2022, the UAE Ministry of Finance announced that it will introduce Federal Corporate Income Tax (CIT) on the net profits of businesses in the UAE, the country of residence of Emirates. Emirates is subject to CIT since 1st of April 2024. Alternatively, countries may exempt the profits derived from international aviation traffic on the basis of reciprocity. In the situation where there is no tax treaty or reciprocal exemption, the profit is in general determined on a net income basis via generally accepted net income apportionment formulas.

Tax is one of the elements the Group takes into account in its commercial and economic activities, while the various businesses within the Group may also respond to available tax incentives and tax exemptions.

The Group focusses on being fully compliant with the applicable tax rules and principles in the various countries in which it operates. This includes the preparation and filing of tax returns in time and the payment of all due taxes in time in accordance with the relevant tax laws and regulations (including international standards such as those issued by the OECD, bilateral tax treaties for the avoidance of double taxation and specific agreements concluded between the Group and the relevant authorities of specific countries).

2. Information on the taxpayer's processes and procedures for managing and ensuring the proper performance of its obligations under tax law

The finance department, in cooperation with the external accounting office, monitors the compliance of activities in the branch with requirements and legislation. The parent company is then informed of all changes. The external accounting office engages licensed tax advisor with reference to services provided to the Company.

The Company has a procedure for checking contractors on the VAT taxable persons' list (so called 'white list').

The Group has global procedures in place regarding Anti-Money Laundering (AML) and identification / reporting tax schemes.

The company works with the IATA organization, which supports it in properly meeting its tax obligations.

3. Voluntary forms of cooperation with the National Tax Administration authorities

There were no voluntary forms of cooperation with the tax authorities and no agreement on cooperation referred to in Article 20s of the Tax Ordinance Act was concluded.

4. Information on the fulfilment of tax obligations by the taxpayer on the territory of the Republic of Poland, together with information on the number of information on the tax schemes referred to in Article 86a § 1 item 10 of the Tax Ordinance, provided to the Head of the National Fiscal Administration, broken down by the taxes to which they relate

Emirates Branch in Poland fulfilled its tax and contribution obligations in Poland in a timely manner and in accordance with the requirements of the law for the different types of taxes and charges. The company paid:

- Social Security Contributions
- PIT
- Environmental levy on gas and dust emissions
- Custom duty

Due to the scale of the Company's activities in Poland, corporate income tax data is published on the website of the Ministry responsible for public finance:

<https://www.gov.pl/web/finanse/2023-bis>

The Company is registered VAT payer and applies 0% VAT rate in its business model.

The company did not file any information on tax schemes with the tax authorities.

5. Information on transactions with related parties within the meaning of Article 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 statement of the company, including entities which are not tax residents of the Republic of Poland

The Company did not engage in any related party transactions other than the allocation of revenues and costs for the purpose of permanent establishment tax profit calculation.

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

The Company did not carry out restructuring operations that could affect the tax liability of the taxpayer or related parties.

7. Information on applications submitted by the taxpayer for the issuance of:

General tax interpretation referred to in Article 14a § 1 of the Tax Ordinance,

The Company did not request such interpretation.

Interpretation of tax regulations, referred to in Article 14b of the Tax Ordinance,

The Company did not request such ruling.

Binding rate information referred to in Art. 42a of the Law on Goods and Services Tax,

The Company did not request such binding rate information.

Binding excise tax information referred to in Article 7d(1) of the Act of 6 December 2008 on Excise Tax (Journal of Laws of 2023, item 1542, 1598 and 1723),

The Company did not request such binding information.

Information concerning the taxpayer's tax settlements in territories or countries applying harmful tax competition indicated in executive acts issued pursuant to Article 11j(2) and pursuant to Article 23v(2) of the Personal Income Tax Act of 26 July 1991 and in a notice issued by the minister competent for public finance pursuant to Article 86a § 10 of the Tax Ordinance

The Company did not settle taxes in territories or countries applying harmful tax competition indicated in executive acts issued pursuant to Article 11j(2) and pursuant to Article 23v(2) of the Personal Income Tax Act of 26 July 1991 and in a notice issued by the minister competent for public finance pursuant to Article 86a § 10 of the Tax Ordinance.