



# Tax Strategy implemented in Poland in 2022

Information on the implemented tax strategy regarding the activities of State Street Bank International GmbH with its seat in Munich, operating in Poland through State Street Bank International GmbH (Sp. z o.o.) Oddział w Polsce ("SSBI") - prepared and made public pursuant to Art. 27c of para. 1 in conjunction with art. 27b para. 2 points 1 and 2 of the Act on Corporate Income Tax.

During the tax year 1.01.2022 to 31.12.2022:

1. SSBI had processes and procedures in place that related to the management of obligations resulting from the provisions of tax law, which ensure their proper performance, regarding, in particular:
  - a. verification of contractors,
  - b. issuance of invoices and acceptance of source documents,
  - c. posting of revenues and expenses,
  - d. calculation of tax liabilities,
  - e. making and retaining of tax filings;
2. SSBI did not participate in any of the voluntary forms of cooperation with the authorities of the State Tax Administration, including in particular, it did not conclude a collaboration agreement as regards taxes pursuant to Art. 20s § 1 of the Tax Ordinance Act;
3. SSBI had timely fulfilled its statutory tax obligations in the territory of the Republic of Poland;
4. SSBI had not provided the Head of the State Tax Administration with any information on tax schemes referred to in Art. 86a § 1 (10) of the Tax ordinance;
5. within its business activity SSBI had solely performed business support functions, supporting the operations of foreign associated entities, including its headquarter and foreign branches. All such services were performed at the request, according to requirements, under supervision and for the benefit of other members of the State Street group. All such dealings were made with related entities within the meaning of Art. 11a (1) (4) of the Act on Corporate Income Tax (the Polish branch did not provide any support services to unrelated entities). The related party dealings with the value exceeding 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, including entities that are not

tax residents of the Republic of Poland, were predominantly realized on the revenue side and were connected with performance of support services for entities from the following jurisdictions:

- Germany
- United Kingdom
- Ireland
- USA
- Italy
- Luxembourg;

6. SSBI had not taken and did not plan to take any restructuring measures that could affect the amount of our tax liabilities and those of entities associated with us, as defined in Art. 11a (1) (4) of the Act on Corporate Income Tax;

7. SSBI did not apply for a general tax interpretation referred to in Art. 14a § 1 of the Tax ordinance;

8. SSBI did not apply for an individual tax interpretation referred to in Art. 14b of the Tax ordinance;

9. SSBI did not apply for the issuance of binding tax rate information referred to in Art. 42a of the Act on Value Added Tax;

10. SSBI did not apply for the binding excise information referred to in Art. 7d (1) of the Act on Excise Duty;

11. SSBI did not settle its tax liabilities in territories or countries applying harmful tax competition indicated in executive acts issued on the basis of

Art. 11j (2) of the Act on Corporate Income Tax and in the announcement of the minister competent for public finance issued on the basis of art. 86a § 10 of the Tax ordinance.

*State Street regards the publication of this information as complying with its duty under art. 27c of the Act on Corporate Income Tax to publish the information on the Tax Strategy realized in Poland.*

*This information is in respect of the 2022 tax year and financial year and the Tax Strategy applicable in this period.*