**Joyson Safety Systems Poland Sp. z o.o.**

Information on the tax strategy implementation for the tax year ended on 31 December 2020

**This Information on the Tax Strategy Implementation fulfils the duty imposed on specified corporate income tax payers in 2021 as laid down in Article 27c of the CIT Act[1].**

## I. About JOYSON SAFETY SYSTEMS POLAND SP. Z O.O.

**Joyson Safety Systems Poland Sp. z o.o.'s** ("Joyson", the "Company") business object is to manufacture safety parts and accessories for vehicles, including seat belts. The Company is engaged in activities in the supplies area and handles engineering tasks within the manufacturing process.

Since 28 October 2002 the Company has carried on its business operations in the Kamiennogórska SME Special Economic Zone (Kamienna Góra Commune).

Joyson's total revenue in 2020 reported in its CIT-8 annual return filed in Poland was in excess of EUR 50m, which is why the Company is required to draw up and publish information on the tax strategy implemented for 2020 on the ground that it has met the conditions laid down in Article 27c Clause 1 in conjunction with Article 27b Clause 2 Item 2 of the CIT Act.

## II. KEY RULES UNDERLYING THE COMPANY'S TAX STRATEGY FOR THE TAX YEAR FROM 1 JANUARY THROUGH 31 DECEMBER 2020

Joyson's guiding principles are inter alia Ethics and Integrity, Commitment to Quality, Accountability and Speaking-Up, which also apply for the Company's tax strategy.

The Company is aware that social responsibility is an important part of its business, specifically in respect of our approach to tax compliance duties. The Company seeks to demonstrate a model social responsibility attitude as a corporate citizen within the broadest sense of the word.

The primary purpose of the Company's tax strategy is to ensure compliance with tax law and other requirements that affect its tax liabilities and the effective operation and maintenance of tax risk management tools.

All of the Company's actions that have an impact on its tax compliance accounts have a business and economic justification.

The solutions we are implementing, which are designed to support our everyday operations, are compliant with the due diligence and care standards applied in the area of the Company's tax compliance duties.

Joyson maintains open and transparent relations with tax authorities. The Company's tax matters are handled by the Key Taxpayers Service Centre.

## III. IMPLEMENTATION OF THE COMPANY'S TAX STRATEGY IN 2020

Bearing the foregoing in mind, under Article 27c Clause 2 of the Corporate Income Tax Act[2], the Company publishes this information on Joyson's tax strategy implementation for the tax year ended on 31 December 2020:

1. The Company made every effort to carry out all its tax duties correctly and within the applicable deadlines, specifically to accurately and timely compute and pay all its liabilities under public law, report and disclose any information to be disclosed mandatorily and implement all and any necessary processes and procedures to facilitate the achievement of the strategic tax objectives.

[1] *The Corporate Income Tax Act of 15 February 1992, JL 2021, Item 1800, (the "**CIT Act**").*

The Company had procedures and instructions in place which governed the management of the duties laid down in tax law and ensured compliance, including inter alia the procedure for identifying tax arrangements (MDR), the fixed assets management procedure, the procedure for monitoring billing operations and payments and other procedures. The cited processed and procedures were subject to review and approval.

The Company provides the ongoing internal monitoring and audit of compliance with the Company's tax procedures, including the due fulfilment of the tax functions assigned and proper measures to respond to and handle any irregularities identified. The Company was continually carrying out measures to identify, evaluate, manage and monitor the applicable tax duties and tax risks.

Adherence to the cited tax compliance duties was controlled and supervised by an internal audit team. While carrying on its day-to-day operations, Joyson exercised diligence to ensure that it stayed abreast of the applicable tax compliance requirements and duties.

The Company also relied on the assistance of third parties that provided professional tax advisory services.

2. Joyson did not use any forms of voluntary cooperation with the National Tax Administration authorities, specifically it did not take part in the cooperation program.

3. The Company carried out its tax compliance duties on a timely basis. In 2020 the Company was a taxpayer or tax remitter of the following taxes/ duties:

| | **Type of tax** | **The Company's taxpayer/ tax remitter status** |
|---|---|---|
| **Income taxes** | Corporate Income Tax | YES |
| | Personal income tax | YES (as a tax remitter) |
| **Indirect taxes** | Value added tax | YES |
| | Customs duty | YES |
| **Other taxes and duties** | Real estate tax | YES |
| | Green tax | YES |

4. In 2020 the Company did not file any tax arrangement reports referred to in Article 86a § 1 Item 10 of the Tax Code to the Director of the National Tax Information Office[3].

5. In 2020 the Company carried out the following transactions with related parties within the meaning of Article 11a Clause 1 Item 4 the value of which was in excess of 5% of the balance sheet total, established by reference to the Company's audited financial statements for 2020:
    a. purchase of components;
    b. sale of finished goods.
6. The Company neither planned nor undertook any restructuring projects that might have affected the level of the Company's tax liabilities or those of its related parties within the meaning of Article 11a Clause 1 Item 4 of the CIT Act.

7. The Company did not file any requests for:

[3] *The Tax Code of 29 August 1997 (JL 2021, Item 1540 with amendments; the "Tax Code").*

a. a general tax ruling referred to in Article 14 § 1 of the Tax Code;
b. a tax ruling referred to in Article 14b of the Tax Code;
c. a binding rate information decision referred to in Article 42a of the Value Added Tax Act[4];
d. a binding excise information decision referred to in Article 7d Clause 1 of the Excise Duty Act[5].

8. In 2020 the Company made settlements with a company based in Hong Kong, which is one of the territories classified as one pursuing harmful tax competition practices. Save the foregoing, the Company did not carry out any tax settlements in the territories or countries pursuing harmful tax competition practices listed in the implementing regulations issued under Article 11j Clause 2 of the CIT Act, under Article 23v Clause 2 of the PIT Act[6] and in the announcement made by the minister competent for public finance under Article 86a § 10 of the Tax Code.

[4] *The Value Added Tax Act of 11 March 2004 (JL 2021, Item 685 with amendments; the "VAT Act ").*
[5] *The Excise Duty Act of 6 December 2008 (JL 2020, Item 722 with amendments).*
[6] *The Personal Income Tax Act of 26 July 1991 (JL 2021, Item 1128 with amendments; the "PIT Act").*