

## **Information on the Implemented Tax Strategy for the tax year lasting from October 1, 2022 to September 30, 2023**

Tyco Electronics Polska Sp. z o.o.

[Prepared on: 27<sup>th</sup> September 2024]

[Updated on: \_\_\_\_ ]

### **List of terms and abbreviations**

For the purposes of this document, the following terms have the following meanings:

<b>Abbreviation</b>	<b>Description</b>
FY23	Tax year started on October 1, 2022 and ended on September 30, 2023
The Group	Term applicable to all TE brand companies worldwide (TE Connectivity Group)
TE PL, the Company	Tyco Electronics Polska Spółka z ograniczoną odpowiedzialnością

## 1. Introduction

This document presents information on the tax strategy implemented by TE PL for FY23, prepared on the basis of Article 27c of the Act of February 15, 1992 of the corporate income tax (hereinafter: the “**CIT Act**”).

TE PL, as a taxpayer of corporate income tax, whose value of revenue obtained in FY23 exceeded the PLN equivalent of EUR 50 million, is required to prepare and publish information on the tax strategy implemented for the tax year ended on September 30, 2023.

The following information has been prepared in accordance with Article 27c of the CIT Act.

## 2. TE PL

TE PL operates within the TE Connectivity Group. The Group produces connectivity and sensor solutions, including electronic and electrical parts. The elements produced by the Group enable development in the field of transport, industry, medicine, energy, data transmission and modern home solutions.

**Table 1. General information about the Company**

<b>Company</b>	Tyco Electronics Polska Spółka z ograniczoną odpowiedzialnością
<b>Address and registered seat of the Company</b>	ul. Cybernetyki 19, Warsaw 02-677
<b>Identification data</b>	KRS: 0000102622 TIN (pol. NIP): 7781001824 REGON: 63020118500000
<b>Share capital</b>	PLN 6 494 650
<b>Date of entry into the Register of Entrepreneurs of the National Court Register</b>	28.03.2002

## 3. Processes and procedures for managing the performance of the tax law obligations and ensuring their proper realization

TE PL complies with the provisions of the tax law, taking into account in its business activity the tax consequences related to the transactions performed and striving for their reliable settlement on tax grounds.

The Company entrusted the keeping of its accounting books and preparation of tax declarations to a specialized unit which provides accounting services to entities from the Group

(“SSC”). The SSC acts as a shared services center, conducting the Company’s settlements in accordance with the internally adopted procedures. The Company supervises the accounting service process, verifies and accepts prepared tax settlements.

The Company follows the principles of diligence, accuracy and prudence in its tax settlements. For these purposes, the Company takes into account tax regulations, individual or general tax rulings, binding tax explanations and commonly accepted good practices.

The tax processes enforced by the Company are aimed at:

- timely fulfilment of obligations related to the preparation and submission of tax returns and other reporting obligations,
- verification of counterparties in order to reduce the risk of concluding transactions with entities involved in risky affairs, in particular those aimed at tax avoidance and tax fraud,
- two-stage verification of prepared tax settlements.

With regard to the implementation of tax processes, the Company carries out procedures covering, inter alia:

- the method of booking documents and analysing inconsistencies (including involvement of external advisors),
- rules for preparing tax calculations and submitting tax returns,
- rules for contact with tax authorities, respecting a transparent approach,
- principles of due diligence in economic transactions, including verification of counterparties in regard to potential areas of economic and tax risk,
- stages of internal approval for transactions and settlements made.

All procedures implemented by TE PL are updated on a regular basis. Personnel responsible for their compliance have appropriate qualifications and experience.

#### **4. Forms of voluntary cooperation with the bodies of the National Revenue Administration**

In FY23, the Company did not use any forms of voluntary cooperation with the bodies of the National Revenue Administration, referred to in Article 27c (2) (1) (b) of the CIT Act.

#### **5. Information on the Company’s fulfilment of tax obligations in the territory of the Republic of Poland**

The Company performs its tax obligations in accordance with the principles of diligence, accuracy and prudence. The Company focuses on reliable reporting and compliance with the Polish regulations, including the timely submission of all tax returns, forms and tax information, collecting the required documentation and meeting tax payment deadlines. The Company makes every effort to ensure that the information provided faithfully reflects the facts and is complete, up-to-date and understandable.

In order to ensure compliance of the tax settlements with applicable regulations, in FY23 the Company ensured applying appropriate resources and tools. While exercising due diligence, the Company relied on the support of professional advisory companies in the field of tax consultancy in its day-to-day operations.

The main taxes under which the Company performed its obligations are:

- corporate income tax (CIT),
- personal income tax (PIT),
- value added tax (VAT),
- customs.

**6. Information on the number of information on tax schemes submitted to the Head of the National Revenue Administration, broken down by taxes to which they relate**

In FY23, the Company did not report to the Head of the National Revenue Administration tax schemes referred to in Article 86a § 1 point 10 of the Tax Ordinance Act of August 29, 1997 (hereinafter: **"Tax Ordinance"**).

**7. Information on transactions with related entities, the value of which exceeds 5% of the balance sheet total of assets, determined on the basis of the last approved financial statement of the Company**

The balance sheet total of the Company as of September 30, 2023 amounted to PLN 613 391 975,45. In the information about the implemented tax strategy, the Company is obliged to disclose those transactions with related entities, the value of which exceeded PLN 30 669 598.77.

In FY23, the Company was a party to the following transactions whose value exceeded the above-mentioned threshold:

1. sale of components concluded with a related entity based in Switzerland;
2. sale of components concluded with a related entity based in Germany;
3. purchase of components for production purposes, concluded with a related entity based in Switzerland;
4. purchase of components for production purposes, concluded with a related entity based in Germany;
5. provision of kitting services to a related entity based in Switzerland;
6. provision of sales support services, service and technical support services to a related entity based in Switzerland;

7. a loan transaction under which a related entity based in Switzerland provided financing to the Company;
8. a loan transaction under which a related entity based in Luxembourg provided financing to the Company;
9. an intra-group financing transaction (cash pooling)

#### **8. Information on planned or undertaken restructuring activities that may affect the amount of tax liabilities of the Company or related entities**

The Company has not taken and is not planning to undertake any restructuring activities in the foreseeable period that could affect the tax liabilities of the Company or its related entities within the meaning of Article 11a (1) (4) of the CIT Act.

#### **9. Information on applications submitted by the Company**

In FY23, the Company did not submit any applications for:

1. general tax ruling referred to in Article 14a § 1 of the Tax Ordinance,
2. interpretation of tax law provisions, referred to in Article 14b of the Tax Ordinance,
3. binding rate information referred to in Article 42a of the Act on value added tax,
4. binding excise information referred to in Article 7d (1) of the Act of December 6, 2008 on excise duty.

#### **10. Information on performing tax settlements by the taxpayer in territories or countries applying harmful tax competition**

The Company does not perform tax settlements in territories or countries using harmful tax competition indicated in the executive acts issued pursuant to Article 11j (2) of the CIT Act and pursuant to Article 23v (2) of the Act of July 26, 1991 on personal income tax and in the announcement of the minister competent for public finance issued pursuant to Article 86a § 10 of the Tax Ordinance.

In particular, in the above-mentioned territories / countries in FY23 the Company:

- was not registered for tax purposes,
- did not submit tax returns or forms,
- did not collect or pay any taxes.