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INFORMATION ON THE TAX STRATEGY IMPLEMENTED IN THE TAX YEAR FROM 1 JANUARY 2021 TO 31 DECEMBER 2021

This Information on the Tax Strategy Implemented is the fulfilment of the duty, arising from art. 27c of the 15th February, 1992 Act on corporate income tax (consolidated text: Journal of Laws of 2021, item 1800, as amended, hereinafter: the CIT Act).

1) Basic assumptions of Onde S.A. tax strategy

Onde S.A. („**the Company**”) makes up an element of Erbud Capital Group, with an experience in the construction industry of over 30 years. The company specializes in construction on the RES market (wind farms and photovoltaics construction). It is one of the construction leaders on the renewable energy market in Poland. The company operates also in the segment of road and engineering construction.

In 2021, ONDE S.A. founded its own capital group. The group was expanded by the photovoltaic and wind farms projects in the **develop, build and sell model**, by purchasing, investing or co-investing in photovoltaic and wind farm projects at various stages of their preparation. The group does not exclude the idea of generation and sale of electricity under the RES installations built by the Company.

The strategic assumption of the Company as a leader in the RES industry is also the attempt to raise social awareness, sustainable development and approach to implemented projects with high standards of security being kept along with care taken for the environment and relations with the external surroundings.

The main assumptions of the Company’s tax strategy, following that of the whole Erbud Group and that of Onde Group, include attempting to ensure correct, complete and timely tax settlements. The Company also undertakes all reasonable actions to minimize tax risks and ensure transparency in relations with tax authorities.

The company complies with high standards of diligence and professionalism in the area of tax management developed and applicable within the Erbud Group. To ensure high quality and the effectiveness of tax processes implemented in the Erbud Group, in earlier years, an entity specialized in accounting-tax operations was founded -- Erbud Shared Services Sp. z o. o., which plays the function of 'Shared Services Centre' ("SSC"). In accordance with the strategic assumptions of the Erbud Group, the company outsourced a part of its tasks in the field of the tax function to the SSC.

SSC has been provided with adequately selected and systematically updated IT systems and appropriately qualified and experienced employees who regularly broaden and deepen their tax knowledge, among other things by participating in tax training. The above resources allow to handle tax settlements and processes of Erbud Group companies at the highest level. At the same time, the Company jointly with SSC also assures that its employees who are involved in the tax function (in particular, in providing output tax data to SSC), do have the appropriate knowledge and access to relevant functionalities in the IT systems.

The Company’s Management Board fulfils an active role in the process of taking key decisions in the tax area, those related to tax risk management included. In the case of new, non-standard, business relevant or high value transactions or actions, the Company carries out a tax analysis at the planning stage. These analyses are carried out with the support of experts from SSC and external tax advisors and they are taken into account in the legal and business analysis of the transaction.

In accordance with the approach adopted by the Company’s Management Board, the Company together with SSC attempts to choose such solutions which limit to a minimum the risk of disputes with tax authorities. The Company and SSC permanently cooperate with entities, providing tax advisory services. In case of doubt as to the application of tax law in significant tax issues, the Company applies for an individual tax interpretation.

2) Information on the processes and procedures applied to manage the fulfilment of obligations, arising from the provisions of tax law and ensuring their being correctly effected

The company and SSC have tax processes/procedures implemented that assure effective tax management, current identification of tax risks and ensure timely submission of tax returns with correct and reliable data.

The Company's cooperation with SSC is established in a way that ensures an efficient and effective flow of data, documents and information. The company lodges with SSC all accounting and legal documents which refer to the transactions or events that could affect tax liabilities and gives them the relevant explanations. SSC takes care for all events which occur in the Company to be correctly recorded in the tax ledgers, and accounted for from tax point of view. It also transfers to the finance department, legal department and the Company's operational departments the relevant information, that on tax risks, if any, included when it requires actions or decisions on behalf of the Company, in particular of its Management Board.

At the moment this information is drawn up, the Company and SSC have the following tax procedures/instructions:

- a) a procedure for preventing non-compliance with the obligation to provide information about tax schemes (MDR-mandatory disclosure report);
- b) an instruction related to the verification of contractors on the so-called 'white list' and the split mechanism payments;
- c) an instruction on how to mark transactions for the purposes of JPK_VAT applicable from 1 October 2020;
- d) an instruction on settling *in minus* adjustments;
- e) a withholding tax (WHT) settlement instruction;
- f) TP's (Loan Transaction) policy on intra-group loans and guarantees;
- g) an operating procedure (automated) for settling bad debt relief in VAT;
- h) a procedure for settling expenses related to company cars.

In addition, both entities' processes have informal tax (not written down) procedures based on currently established practice with regard to cooperation and flow of tax information between the Company and SSC and all significant areas of the Company's tax settlements, such as VAT settlements and CIT and PIT tax advances of employees.

The above tax procedures/processes ensure that the Company's tax issues are properly managed and supervised.

3) Information on voluntary forms of cooperation with the National Revenue Administration authorities

In 2021, the Company did not participate in voluntary forms of cooperation with the National Revenue Administration authorities

4) Information on the fulfilment of tax obligations in the territory of the Republic of Poland, together with that on the number of pieces of information provided to the Head of the National Revenue Administration about tax schemes referred to in Art. 86a § 1 point 10 of the Tax Code, broken down into the taxes to which they relate

The company is a taxpayer of corporate income tax, value added tax, Council tax on real estates, tax on civil law transactions and tax on means of transport. The company is personal income tax payer.

In 2021, the Company did not provide the Head of the National Revenue Administration with information on the tax schemes (In 2021, the Company did not identify in connection with its operations any tax schemes liable to reporting).

5) Information on transactions with related entities within the meaning of art. 11a subpara. 1 point 4, whose value exceeds 5% of balance total assets as understood by the accounting regulations, set forth pursuant to the last approved financial statements of the company, including those that are not tax residents of the Republic of Poland

In 2021, the Company carried out transactions with related entities, whose total value exceeded 5% of total assets.

Below, you will find the information on the Company's most significant transactions with related entities (capital connections; in relation to loan transactions and sureties when setting forth the value of the transactions, the amounts of interest and fees paid / received in 2021 were included):

- 1) Erbud S.A. – purchase transactions of construction services, support services, loans granting, security granting, loans being granted and securities being granted at a total value of: about PLN 100 million.
- 2) Erbud Shared Services Sp. z o.o. - purchase transactions of support services at a total value of: about PLN 3 million.
- 3) IDE Projekt Sp. z o.o. - purchase transactions of designing services at a total value of: about PLN 3 million.
- 4) Ear-Marked Companies (SPV) from the RES segment – transactions to finance projects of these companies (RES projects).

6) Information on restructuring activities planned or undertaken by the taxpayer that may affect the total of tax liabilities of the taxpayer or related entities as understood by Art. 11a subpara. 1 point 4

In 2021, the Company participated in the following restructuring transactions *sensu largo*:

1. ONDE SA's acquisition of shares in 21 RES segment companies, submitting an application to register Devoze sp. z o.o. Company and the acquisition of 100% of shares of IDE Projekt sp. z o.o. designing company and in consequence founding ONDE Capital Group, made up by 23 subsidiaries
2. Increase in the share capital (8,250,000 new shares) and listing on the Warsaw Stock Exchange;
3. Issuance of 1,105,000 shares under the employee programme and their acquisition by managers and key employees of ONDE Group;
4. Furthermore, ONDE Group launched business in the area of renewable Energy sources in the **develop, build and sell model**. This business is based on acquisition, development, building, and then, sale of photovoltaic and wind farm projects.

The above actions were not motivated by the desire to achieve a tax advantage, but only by strictly business conditions.

7) Information on the taxpayer's applications for a general tax interpretation, referred to in Art. 14a § 1 of the Tax Code, for the interpretation of tax law, referred to in Art. 14b of the Tax Code, for the binding tax rate information referred to in Art. 42a of the Act on value added tax, for the binding excise information referred to in art. 7d subpara. 1 of the 6th December 2008 Act on excise tax (Journal of Laws of 2020, item 722, as amended)

In 2021, the Company did not submit any applications for an individual tax interpretation, general tax interpretation, binding tax rate information or binding excise information.

8) Information on the taxpayer's tax settlements in the territories or countries, applying detrimental tax competition indicated in executory acts issued pursuant to art. 11j subpara. 2 and pursuant to art. 23v subpara.2 of the 26th July, 1991 Act on personal income tax and in the announcement of the minister responsible for finance issued pursuant to art. 86a § 10 of the Tax Code

In 2021, the Company did not make any tax settlements in territories or countries which apply detrimental tax competition.