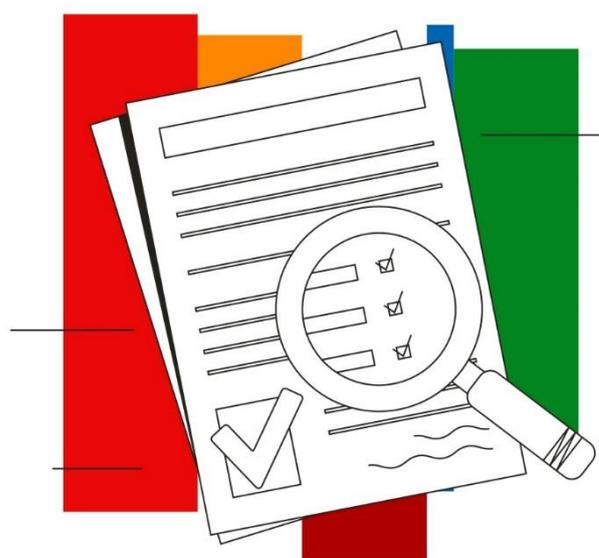


# Information on the implemented tax strategy for Podatkowa Grupa Kapitałowa mBank

Tax report for 2020



## Entity drawing up the information

Name: Podatkowa Grupa Kapitałowa mBank ("PGK")  
Tax Identification Number: 1070044374  
Registered office: ul. Prosta 18, 00-850 Warszawa  
Fiscal year: 1 January 2020 – 31 December 2020  
Date of preparation of the information: 30 September 2021

## Scope of information

We have prepared and publish this **information on the implemented tax strategy for 2020** ("Tax Report"), in accordance with Article 27c of the Corporate Income Tax Act of 15 February 1992 ("CIT Act").

In the Tax Report, we refer in particular to:

- information on the processes and procedures followed by PGK to manage and ensure the proper performance of its obligations under tax law,
- information on voluntary forms of cooperation with bodies of the National Revenue Administration applied by PGK,
- information on the fulfilment of tax obligations by PGK in the territory of the Republic of Poland, including the number of tax scheme notifications provided to the Head of the National Revenue Administration in accordance with the relevant provisions of tax law, including a breakdown by the taxes to which they relate,
- information on transactions with related parties within the meaning of the relevant provisions of tax law, whose value exceeds 5% of the total assets within the meaning of the accounting regulations, determined on the basis of the last approved financial statements, including information on transactions with entities which are not tax residents of the Republic of Poland,
- information on restructuring activities planned or undertaken by PGK, which may affect the amount of tax liabilities of the Bank or of related parties within the meaning of the relevant provisions of tax law,
- information on applications submitted by PGK for the issuance, in accordance with the relevant provisions of tax law, of a general tax interpretation, an individual tax interpretation, binding tax rate information or binding excise information,
- information concerning tax payments of PGK in territories or countries applying harmful tax competition as defined in the relevant provisions of tax law.

**We have not presented** information covered by trade, industrial, professional or manufacturing process secrecy in the Tax Report.

## Tax report for PGK

- As of 1 January 2020, mBank S.A., mBank Hipoteczny S.A., mFinanse S.A. and mLeasing Sp. z o.o. ("Companies") formed **Podatkowa Grupa Kapitałowa mBank** ("PGK"). The Companies entered into an agreement for four years. According to tax law, the entire tax capital group was a corporate income tax (CIT) taxpayer in 2020. mBank S.A. was the parent company and, in particular, calculated, collected and paid CIT on behalf of PGK.
- In 2020, it was PGK's objective to **duly perform all the obligations** provided for by CIT Act ("Tax Strategy"). We pursued this objective based on internal regulations of the Companies and the agreement concluded by the Companies which sets out the principles of performing tax obligations in PGK.
- In 2020, PGK **did not participate** in any of the voluntary forms of cooperation with bodies of the National Revenue Administration, among others, PGK did not enter into a tax cooperation agreement pursuant to Article 20s of the Tax Ordinance Act of 29 August 1997 ("Tax Ordinance").
- In 2020, PGK performed its tax obligations in the territory of the Republic of Poland in accordance with tax law. mBank S.A., as the parent company, paid CIT on behalf of PGK in accordance with the CIT Act. For the year 2020, CIT for PGK amounted to **PLN 478.0 million** as at the date of the Tax Report.
- In 2020, PGK **did not provide** the Head of the National Revenue Administration with tax scheme notifications. There were no circumstances obliging PGK to provide such a notification.
- In 2020, PGK **carried out transactions** with related parties within the meaning of Article 11a(1)(4) of the CIT Act in connection with transactions with related parties carried out by individual Companies. Detailed information in this respect is provided in the tax reports of individual Companies.
- In 2020, PGK **did not undertake and did not plan** any restructuring activities which could affect the amount of tax liabilities of PGK or related parties within the meaning of Article 11a(1)(4) of the CIT Act.
- In 2020, PGK submitted **5 requests** for tax law interpretations referred to in Article 14b of the Tax Ordinance (individual interpretations). PGK did not submit requests for a general tax interpretation referred to in Article 14a(1) of the Tax Ordinance, binding tax rate information referred to in Article 42a of the VAT Act of 11 March 2004, and binding excise tax information referred to in Article 7d(1) of the Excise Tax Act of 6 December 2008.
- In 2020, PGK **did not make** tax payments in territories or countries applying harmful tax competition listed in the implementing regulations issued pursuant to Article 11j(2) of the CIT Act and in announcement of the minister responsible for public finance issued pursuant to Article 86a(10) of the Tax Ordinance.

## Additional information

The Tax Report is available on our website: <https://www.mbank.pl/o-nas/informacje-wymagane-przepisami-prawa/informacja-o-realizowanej-strategii-podatkowej>.

Read other important document: *Annual report of mBank S.A. Group for 2020*.

## Appendices

- 1/ *Information on the implemented tax strategy for mBank S.A.*
- 2/ *Information on the implemented tax strategy for Bank Hipoteczny S.A.*
- 3/ *Information on the implemented tax strategy for mLeasing Sp. z o.o.*
- 4/ *Information on the implemented tax strategy for mFinanse S.A.*