

Mefta Green Transfo Energy Poland sp. z o.o.

INFORMATION ON THE IMPLEMENTED TAX STRATEGY

for the fiscal year lasting:

January 1, 2022 to December 31, 2022

Document title

Information on the implemented tax strategy for 2022 in Schneider Electric Transformers Poland sp. z o.o (now Mefta Green Transfo Energy Poland sp. z o.o.) (hereinafter: "**the Company**").

Legal basis for publication of information on the implemented tax strategy

Pursuant to the wording of the Corporate Income Tax Act of February 15, 1992 (i.e., Journal of Laws of 2021, item 1800, as amended, hereinafter the "**CIT Act**"), effective as of January 1, 2021, selected CIT taxpayers are obliged to publish information on the executed tax strategy. The obligation arises, among other things, in a situation where the revenue criterion referred to in Article 27b, Section 2, Point 2 of the CIT Law is met.

In view of the Company's fulfillment of the revenue criterion for the fiscal year from January 1, 2022 to December 31, 2022 (hereinafter: the "**Fiscal Year**"), the Company hereby fulfills the obligation imposed by the CIT Law and publishes information on the executed tax strategy for the Fiscal Year with the scope of data required under Article 27c, Section 2 of the CIT Law.

I. General information about Schneider Electric Transformers Poland sp. z o.o.

In 2022, the Company was part of the Schneider Electric international capital group (hereinafter: "**Schneider Group**" or "**Group**") operating in the broad energy industry.

On January 5th 2023, the Company was sold by Schneider Electric Polska sp. z o.o. to the French entity Green Transfo SAS, and changed its name to Mefta Green Transfo Energy Poland sp. z o.o..

During the Fiscal Year the Group's strategy focused on carrying out a global digital transformation, integrating world-leading process and energy technologies, automation, real-time control systems, software and digital services for various market segments: industrial plants, office and residential buildings, data centers and critical infrastructure facilities.

The Company is one of the leading manufacturers of medium-voltage transformers in Poland. The Company's headquarters are located in Mikolow, where the Company operates its manufacturing plant.

During the Fiscal Year, the plant produced transformers using two different technologies:

- MINERA oil-immersed transformers in the power range from 25kVA to 4MVA;
- TRIHAL dry-type transformers with vacuum technology, in the power range from 40kVA to 4 MVA;

The Company's production is aimed at both highly specialized customers from the energy and industrial sectors (large corporations and power utilities), as well as individual customers (small businesses).

The Company exports its products in particular to markets such as France, Belgium, Denmark, Germany, Greece, Czech Republic, Slovakia, Sweden, Hungary, Austria.

The transformers produced meet the highest quality standards, and are designed with attention to both the highest durability, reliability and efficiency of the device itself, as well as the most economical operation possible throughout the life of the product.

In all areas of its business, including tax matters, the Company is based on the following values: honesty, transparency, responsibility and integrity, implementing best market practices in this regard.

The Company adheres to universal ethical values in its operations (and requires it from its environment, including employees in particular). In addition, it makes every effort to act in the best interests of its employees, its associates and partners, also keeping in mind the welfare of local communities and the environment. The above is

accomplished by using available energy and resources in its operations, while combining innovative solutions and sustainable development.

II. Information on the tax strategy implemented in the Fiscal Year

1. Processes and procedures for managing the performance of tax law obligations and ensuring their proper execution

The Company's basic objectives for the tax function

It is the Company's goal and objective to fulfill all tax obligations imposed by applicable laws in a correct and timely manner.

With this goal in mind, the Company is taking a number of measures to properly perform its tax obligations, including payment of taxes in the amount prescribed by the relevant tax laws.

In particular, the implementation of this objective in the Fiscal Year was made possible by the Company's appropriate organizational structure, which is adapted to the size and type of business and allows for the effective management and execution of the Company's tax function.

In order to ensure the fullest implementation of tax objectives, a number of processes and procedures were in place at the Company during the Fiscal Year to systematize and safeguard key areas of tax function execution.

The procedures and processes in place at the Company are properly organized, and their degree of formalization (by writing them down) is adapted to the Company's needs, i.e. some of them, due to, among other things, the materiality of the amounts and the complexity of the duties, have been written down in the form of formal procedures, while some of them function on the basis of patterns of procedure developed over the years of the Company's operation and in close cooperation with external tax advisors.

Implementation of the tax function - tax settlements, reporting

The basic principles for handling tax matters in the Fiscal Year were based on tax regulations and generally accepted good practices.

The processes and procedures in place were aimed at accurate reporting and compliance with applicable regulations, including the submission of tax returns, forms and information, as well as meeting tax payment

deadlines under tax regulations. The Company strived and made every effort to ensure that the reported information reflected the facts and was complete and up-to-date.

Moreover, the persons responsible for performing tasks in the tax area at the Company have the appropriate training and professional experience to ensure the proper implementation of tax obligations.

In addition, the Company has a system of training in practice to ensure that those involved in the execution of the

In addition, the Company has a system of training in practice to ensure that those involved in the execution of the tax function have the appropriate competence, so that the Company has efficient and well-prepared human resources responsible for the proper operation of the tax function.

Approach to the economic environment (counterparties, tax administration authorities)

In terms of its relations with counterparties, the Company strived during the Fiscal Year to apply an approach that ensures respect for the principles of merchant integrity and fulfillment of obligations stipulated by law. In terms of taxation, the Company's approach was expressed in its efforts to apply transparent contractual arrangements that do not raise doubts from the tax side, timely issuance of invoices and payment of receivables.

In its dealings with the tax administration, the Company was guided by the principles of transparency and proactivity. The Company sought to establish and maintain good relations with the tax authorities, conducting them in a professional, reliable and timely manner.

2. Voluntary forms of cooperation with the National Tax Administration authorities

The Company indicates that during the Fiscal Year it did not participate in any voluntary formalized forms of cooperation with the National Tax Administration authorities.

In particular, the Company did not enter into a tax cooperation agreement pursuant to Article 20s § 1 of the Tax Ordinance Act (i.e., Journal of Laws 2021, item 1540, as amended, hereinafter: the "**Tax Ordinance**").

Notwithstanding the above, however, the Company, in its dealings with tax authorities, is characterized by openness and transparency, so as to perform all tax obligations in a reliable, correct and timely manner.

3. Information on the Company's performance of tax obligations in the territory of the Republic of Poland, including information on tax schemes submitted to the Head of the National Tax Administration

The Company indicates that in the Fiscal Year, it timely fulfilled all obligations under the tax laws in force in the territory of the Republic of Poland.

In terms of tax reporting, the Company made every effort to ensure that tax declarations, information, forms and returns were submitted within the deadlines required by the law, and that their content was complete, understandable and corresponded to actual economic events. During the Fiscal Year, the Company met its tax payment deadlines. The Company fulfilled its obligations based on the applicable laws and regulations, taking into account the specifics of its business activities.

The Company indicates that in the Fiscal Year it did not identify any reportable tax schemes in the course of its business and thus did not submit to the Head of the National Tax Administration the information on tax schemes referred to in Article 86a of the Tax Ordinance.

4. Transactions with related parties

The Company presents below information on transactions carried out with related parties within the meaning of Article 11a, Section 1, Item 4 of the CIT Law, the value of which exceeded 5% of total assets within the meaning of the accounting regulations, as determined on the basis of the last approved financial statements, including entities that are not tax residents of the Republic of Poland.

No.	Type of transaction	Entity name	Country of residence
1	Sale of finished goods	Schneider Electric Austria GmbH	AT
2	Sale of finished goods	Schneider Electric Australia Pty Ltd	AU
3	Sale of finished goods	Schneider Electric NV/SA	BE
4	Sale of finished goods	Schneider Electric Schweiz AG	CH
5	Sale of finished goods	Schneider Electric CZ, s.r.o.	CZ
6	Sale of finished goods	Schneider Electric Niemcy	DE
7	Sale of finished goods	Schneider Electric Denmark	DK
8	Sale of finished goods	SCHNEIDER ELECTRIC A.E.B.	GR
9	Purchase	SCHNEIDER ELECTRIC GB	GB
10	Sale of finished goods	Transvo Servis	FR
11	Sale of finished goods/ purchase	Schneider Electric Industries	FR
12	Cash pooling	SNC Boissiere Finance	FR
13	Sale of finished goods/ purchase	Schneider Electric SA	FR

14	Sale of finished goods	Schneider Electric France	FR
15	Sale of finished goods	Schneider Electric International	FR
16	Sale of finished goods	Schneider Electric d.o.o.	HR
17	Sale of finished goods	Schneider Electric Hungaria Zrt.	HU
18	Sale of finished goods	Schneider Electric Lietuva	LT
19	Sale of finished goods	Schneider Electric Latvia SIA	LV
20	Sale of finished goods	Schneider Electric	NL
21	Sale of finished goods/ purchase/cash pooling	Schneider Electric Polska Sp. z o.o.	PL
22	Sale of finished goods	Elda-Eltra Electra	PL
23	Sale of finished goods	Schneider Electric Romania S.R.L.	RO
24	Sale of finished goods	Schneider Electric Serbia	RS
25	Sale of finished goods	Schneider Electric SE0100	SE
26	Sale of finished goods	Schneider Electric d.o.o.	SI
27	Sale of finished goods	Schneider Electric Slovakia Spol s.	SK
28	Sale of finished goods	Schneider Electric Saudi Arabia	SA
29	Sale of finished goods	Schneider Electric Ukraine LLC	UA
30	Sale of finished goods	Schneider Electric Egypt&NEA Egipt	EG
31	Sale of finished goods	Schneider Electric RPA	ZA
32	Purchase	Schneider Enerji Endustrisi	TR
33	Sale of finished goods	SCHNEIDER ELECTRIC NIGERIA LTD	NG
34	Sale of finished goods	Schneider Electric SE CHINA	CN

The Company further points out that the remuneration determined in transactions with related parties corresponds to the arm's length principle, described in detail in the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations and the Polish CIT Act.

At the same time, the Company indicates that all documentation obligations under the transfer pricing regulations have been fulfilled by the Company in accordance with the applicable regulations.

5. Restructuring activities

The Company informs that during the Fiscal Year it neither planned nor undertook restructuring activities that could affect the tax liabilities of the Company or related parties within the meaning of Article 11a, Section 1, Point 4 of the CIT Law.

6. Information on submitted applications for general tax law interpretations, individual tax law interpretations, binding rate information and binding excise information

The Company did not file applications for the Fiscal Year for:

- a) general tax interpretation referred to in Article 14a § 1 of the Tax Ordinance;
- b) an individual tax interpretation referred to in Article 14b § 1 of the Tax Ordinance;
- c) binding rate information (WIS), as referred to in Article 42a of the Tax on Goods and Services Act of March 11, 2004 (i.e., Journal of Laws of 2021, item 685, as amended);
- d) binding excise information (WIA) referred to in Article 7d, Section 1 of the Excise Tax Act of December 6th, 2008 (i.e., Journal of Laws of 2020, item 722 and 1747, as amended).

7. Information on tax settlements in territories or countries practicing harmful tax competition

The Company informs that in the Fiscal Year it did not make tax settlements in territories or countries applying harmful tax competition indicated in the executive acts issued on the basis of Article 11j, Section 2 of the CIT Law and in the announcement of the Minister responsible for public finance issued on the basis of Article 86a, Section 10 of the Tax Ordinance.