

# Information about tax strategy implemented in Standard Chartered GBS Sp. z .o.o in 2023

#### Introduction

This document fulfils the obligation of SC GBS Poland sp. z o.o. ("Company") to prepare and publish information about the implemented tax strategy, as specified in Article 27c of the Act of February 15, 1992 on the Corporate Income Tax (consolidated text, Journal of Laws of 2021, item 1800 as amended; "the CIT Act"), for 2021.

### I. Information about the Company

The Company is a member of the Standard Chartered group of companies. The Standard Charted group is a leading global financial institution that delivers a broad range of financial services across investment banking, securities, investment management and consumer banking to a large and diversified client base that includes corporations, financial institutions, governments and individuals. Founded in 1969, the Standard Chartered group is headquartered in London and maintains offices in all major financial centres around the world.

The core business of the Company is to provide support services to other entities in the Standard Chartered group. The Company provides mainly technological and operational support services.

## II. Standard Chartered Group's approach to Tax

The Group's approach to tax is governed by our tax strategy which has been approved by the Board.

Under our tax strategy, we manage our tax affairs in alignment with our commercial strategy, having regard to building long term shareholder value and to maintaining our reputation as a responsible taxpayer with tax authorities and regulators. The Group aims to control tax risks to ensure that losses (financial or reputational), including any related to conduct of business matters, do not cause material damage to the Group's franchise. Risks relating to the tax aspects of financial crime compliance are governed by the Group Financial Crime Risk Committee. Management of all other tax risks is overseen by the Group Non-Financial Risk Committee. Both directly report to Group Risk Committee.

Standard Chartered operates in accordance with our values and our Brand Promise Here for good. In the UK, Standard Chartered has adopted The Code of Practice on Taxation for Banks, which commits us to operate in accordance with our understanding of the intentions of Parliament in relation to tax planning. We seek to apply this standard in all jurisdictions in which we operate and are committed to paying all taxes legally due. We manage our relationships with tax authorities and regulators in a transparent, professional and constructive manner. We routinely seek feedback from HM Revenue and Customs (HMRC) on our relationship with them and we seek to resolve issues with HMRC before returns are filed where practicable. Standard Chartered contributes to the development of sustainable tax policy and legislation, typically through direct engagement with tax authorities, public consultation processes or in our role as a member of an industry group.

We are a global business and have substantial commercial operations in both high and low tax jurisdictions. Our tax filings are based on the premise that transactions between group entities are priced on an arm's length basis. We do not artificially erode tax bases or divert profits. Tax is considered as part



of relevant business decisions and we only engage in tax planning that supports a genuine commercial activity. We do not enter into transactions whose sole purpose is to minimise or reduce tax cost. Similarly, we do not promote products to our customers where the tax treatment is contrary to our understanding of the intent of the law. We are committed to combatting financial crime, including money laundering arising from tax evasion, and in accordance with the UK's corporate criminal offence legislation, prevention of the facilitation of tax evasion by the Group or associated persons. We also support tax authorities in their efforts to tackle tax evasion through client tax information regimes such as FATCA and the Common Reporting Standard.

#### III. The Company approach to Tax in 2021

1) The Company applied appropriate processes and procedures appropriate processes and procedures for all relevant Polish tax regimes.

The Company identifies and assesses all tax risk arising from its business activities. To ensure consistency, for all decisions where potential tax risk has been identified, the risk is assessed and rated using a standard risk assessment methodology. The Company systemically identifies existing or emerging tax risks, which exceed appetite as well as tax risk metrics and/or learn lessons from significant internal or external events to implement relevant mitigating actions. This is achieved through Enterprise Risk Management Framework

The Tax Obligations and Tax Risk Management Framework (including a Framework for Client Tax Risk) frames the overall tax policy for the Group. Tax standards mapped to the policy are as follows: Transfer Pricing Standards, FACTA & US Tax Withholding Standard, Common Reporting Standard, Business Tax Standard and Tax Compliance Standard. Tax Risk Metrics ensure that taxes are managed appropriately. Tax obligations are discharged by a three lines of defence model. Each team who has first line responsibility has written operating procedures and controls in place.

- 2) The Company was not party to a cooperation agreement in the field of taxes pursuant to Article 20s.1 of the Act of August 29, 1997 Tax Ordinance (consolidated text, Journal of Laws of 2021, item 1540 as amended: "Tax Ordinance") and was not a party to an advance pricing agreement (APA).
- 3) The Company was committed to fulfil all its tax obligations imposed on it in the territory of the Republic of Poland correctly and in a timely manner. In fulfilling its tax and reporting obligations, the Company strives to interpret tax regulations in accordance with the wording and purpose of the law, as well as apply the prevailing interpretation of tax law.
- 4) In the fiscal year 2023, the Company performed tax obligations in the following scope: as a taxpayer of corporate income tax, as a taxpayer of value added tax, as a tax remitter of personal income tax, as a tax remitter of corporate income tax, as an entity obliged to perform information obligations resulting from the Tax Ordinance and other provisions of the tax law.
- 5) For the 2023 year the Company has been outsourcing certain activities to ensure proper performance of tax obligations relating to CIT, VAT, PIT, withholding tax and transfer pricing to external professional entities. The Company makes sure that external firms receive all information necessary to properly perform contracted activities and monitors the quality of services delivered by these service providers.



- 6) In cases of significant tax issues or risk, the Company seeks advice from external professional advisers.
- 7) The Company analysed the transactions or activities performed to comply with the obligation to report information on the tax schemes (MDR), using the procedure in place to prevent failure to comply with the obligation to provide information on tax schemes implemented in the Company. In 2023 the Company provided information on tax scheme (MDR-1) referred to in Article 86b.1, 86c.1 and 86c.2 and 86d.4 of the Tax Ordinance in reference to corporate income tax.
- 8) The Company performed transactions with related entities within the meaning of Article 11a.1.4 of the CIT Act, the aggregate value of which exceeded 5% of the balance sheet total of assets within the meaning of the accounting regulations, determined on the basis of the last audited financial statements of the Company.

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Groups Legal Entities	Standard Chartered Bank, Singapore; Standard Chartered Bank, UK; Standard Chartered Bank, USA; Standard Chartered Bank AG; Standard Chartered Global Business Services Co.; Standard Chartered Bank Kenya LTD; Standard Chartered Bank Zimbabwe Ltd; Standard Chartered Bank Tanzania Ltd; Standard Chartered Bank Gambia Ltd; Standard Chartered Bank Sierra Leone Ltd; Standard Chartered Bank Uganda Ltd; Standard Chartered Bank, Falklands; Standard Chartered Bank, Bahrain; Standard Chartered Bank, UAE; Standard Chartered Bank, Jordan Limited; Standard Chartered Bank (HK) Ltd; Standard Chartered Bank Mauritius OBU; Standard Chartered Bank, Angola; Standard Chartered Bank Nigeria Ltd; Standard Chartered Bank Botswana Ltd; Standard Chartered Bank, Oman; Standard Chartered Bank, South Africa; Standard Chartered Bank, Qatar; Standard Chartered Bank, Iraq; Standard Chartered Bank (Singapore) Ltd; Standard Chartered Global Business Services (Guangzhou); Standard Chartered Bank, Australia Bch, Standard Chartered Bank Malaysia Bhd; Standard Chartered Bank Cote d' Ivoire SA; Standard Chartered Bank, ARO; Standard Chartered Bank Cameroon SA; Standard Chartered Bank, ARO; Standard Chartered GBS Private Ltd.; Standard Chartered Bank (Singapore); Standard Chartered Bank, MESA; Standard Chartered Bank, Philippines; Standard Chartered Bank Zambia Ltd; Standard Chartered Bank, Brunei; Standard Chartered Bank, Japan; Standard Chartered Bank Sri Lanca; Standard Chartered Bank Vietnam
Services	The Company provides business services including information technology, financial crime compliance, risk management, legal services, human resources, corporate and investment banking, compliance, finance, and operations, banking, and other business support services to its related parties from the Standard Chartered Group.

- 9) The Company did not plan and did not perform any restructuring activities that could affect the amount of its tax liabilities or tax liabilities of related entities within the meaning of Article 11a.1.4 of the CIT Act.
- 10) The Company did not apply for:
- a) a general tax ruling referred to in Article 14a.1 of the Tax Ordinance,



- b) binding rate information referred to in Article 42a of the Act of March 11, 2004 on the tax on goods and services (consolidated text, Journal of Laws of 2021, item 685 as amended),
- c) binding excise information referred to in Article 7d.1 of the Act of 6 December 2008 on excise duty (consolidated text, Journal of Laws of 2020, item 722 as amended);
- 11) The Company did not apply for an individual tax ruling (under Article 14b.1 of the Tax Ordinance).
- 12) The Company did not settle any taxes in the territories or countries applying harmful tax competition indicated in executive acts issued on the basis of: Article 11j.2 of the CIT Act, Article 23v.2 of the Act of July 26, 1991, on personal income tax and the announcement of the minister competent for public finance issued pursuant to Article 86a.10 of the Tax Ordinance.