

Clarios Poland Tax Strategy – 2022

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This document has been prepared by Clarios Poland Sp. z o. o. (“CP” or “the Company”) to ensure compliance with tax obligations purposes specified in art. 27c of the Tax Income Act, enacted on February 15, 1992, with subsequent changes in force from January 1, 2022 – “Information about the implementation of tax strategy”. During preparation of this document, CP considers official Guidelines of National Tax Administration (KAS), and following Framework of Internal Tax Controls.



1. Introduction – Clarios group

Clarios is a world leader in advanced energy storage solutions headquartered in Milwaukee, State of Wisconsin, United States (“U.S.”).

Clarios operates globally, serving customers in over 140 countries, through affiliates located in over 40 countries across the world.

Clarios is a subsidiary of Brookfield Business Partners LP (“BBU”), a business services and industrial company focused on owning and operating high-quality businesses that benefit from barriers to entry and/or low production costs.

Clarios Poland tax strategy is consistent with the Company’s overall global tax strategy which covers all entities consolidated in Brookfield’s financial statements which are prepared in conformity with accounting principles generally accepted in the United States of America.

2. Information about tax processes and tax procedures and used by Clarios Poland, to fulfill all obligations resulting from tax regulations and ensuring accuracy and timely filings of tax returns and tax payments

Clarios Poland is committed to full compliance with all statutory obligations and full disclosure to tax authorities. The Company’s tax affairs are managed in a way which considers the corporate reputation and are done in line with Brookfield’s overall high standards of governance.

Clarios Poland conducts business activity and settles tax liabilities in Poland. In particular, the Company settles corporate income tax (including withholding tax), personal income tax, value added tax and other taxes and fees if such an obligation arises. Clarios Poland is obliged to comply with both the principles resulting from the local tax strategy implemented by the Company and the global tax strategy implemented by the Clarios Group. The Company’s main objective is to exercise due diligence in the performance of its obligations under tax regulations applicable to the Company.

The calculation of the Company’s tax liabilities is made on the basis of the law, and the payment of tax liabilities is carried out in a timely manner. Tax returns and information required by law are also submitted on time. If necessary, the Company makes appropriate corrections to the submitted tax returns, information or the amount of the tax liability paid, ensuring that the Company’s settlements are consistent with the law and the actual course of economic events.

3. Information about voluntary forms of cooperation with bodies of the National Revenue Administration implemented by Clarios Poland

Clarios Poland maintains professional and transparent relationships with the tax authorities and ensure timely and accurate tax compliance reporting. In 2022, Clarios Poland had no compliance program cooperation with the National Tax Administration.

4. Information regarding implementation of tax obligations, including complex reporting of tax schemes- Mandatory Disclosure Rules (MDR)

In 2022, Clarios Poland did not have any arrangements that would require submission of MDR reports. The Company constantly monitors events in terms of a possible obligation to report a tax scheme

5. Information about transactions with related party entities. Information about planned restructuring activities or undertaken ones Clarios Poland

During 2022, Clarios Poland purchased products from related parties for distribution to third-parties. Clarios Poland also collected battery cores from third parties and sold them to affiliated company for lead recycling. Company also received and provided some centralized services to related party entities.

Clarios Poland not planned and was not involved in or affected by business restructurings or intangible transfers in 2022.

6. Information about individual tax rulings requested or received by Clarios

During 2022 Clarios Poland didn't submit any tax rulings nor was involved in other tax proceedings with National Tax office.

7. Information about transactions with entities located in tax havens

During 2022 Clarios Poland didn't have any transactions with entities located in tax havens.