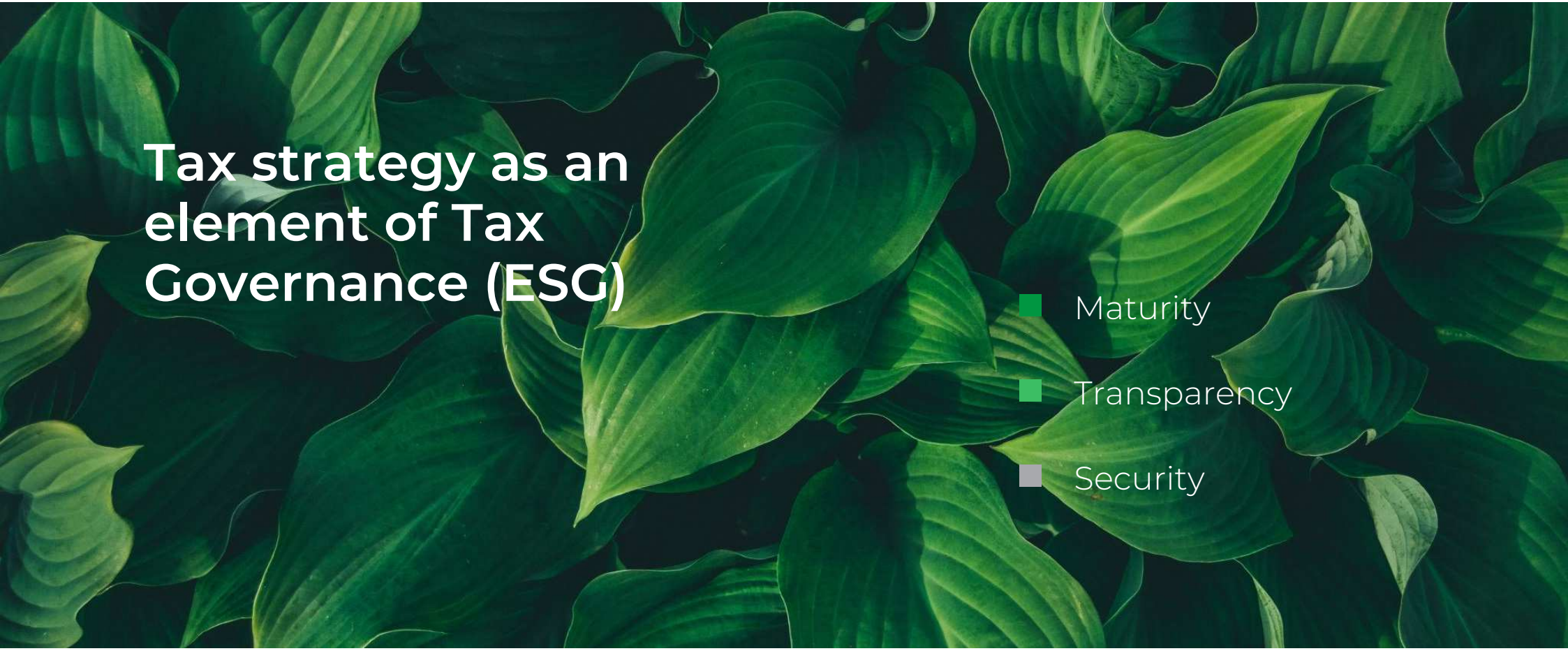
Pelion



Tax Strategy

Tax objectives and mission of the PELION Group, companies operating in a responsible and sustainable manner



Sustainable tax management that is efficient, transparent and fair towards our environment

Tax vision and mission

- Our strategy is to steadily and consistently build a strong position in the healthcare sector through the dynamic development of individual business lines, responding to the expectations of patients, customers and business partners, setting trends in the industry and implementing innovative solutions.

- Taxes paid by the PELION Group Companies constitute a justified and, at the same time, measurable contribution to the functioning of society

The tax mission is an element of corporate social responsibility



We build the economy



Taxes as an investment in society



We act responsibly

Long-term Tax Objectives



Fulfilment of tax obligations in accordance with applicable regulations



Dialogue with tax authorities (cooperation based on fair and transparent principles)



Mitigation of tax risk (supervision and control over the fulfilment of tax obligations)

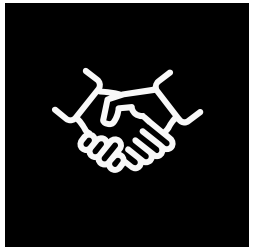


Application of the arm's length principle in transactions with related parties



Avoidance of structures designed for aggressive tax planning or tax avoidance

Fulfilment of tax obligations in accordance with applicable regulations



Meeting our social responsibility to pay taxes on time in amounts determined in accordance with applicable regulations



Fulfilment of tax obligations taking into account generally applicable tax law, including European Union law and ratified international agreements



Application of tax regulations taking into account current interpretations of tax authorities, court rulings and explanations, instructions and other guidelines of tax authorities

Fulfilment of tax obligations in accordance with applicable regulations

- The PELION Group Companies meet their social responsibility for the timely collection, payment and remittance of taxes and other public-law liabilities

- The PELION Group Companies submit tax returns, declarations and information to the tax authorities on time, fulfil their obligations with respect to the reporting of tax schemes (MDR) and comply with TP (transfer pricing) obligations

- The PELION Group Companies monitor changes in tax regulations and their interpretation and take measures to adapt the organisation in a timely manner to the requirements arising from changing regulations or their interpretation

  - Ongoing updating of internal procedures
  - Use of instruments permitted under generally applicable law (including applications for individual tax rulings and binding rate information) in order to ensure that actions taken or planned comply with tax law

Mitigation of tax risk

The priority of the PELION Group is to minimise tax risk, understood as:

- the risk of tax arrears arising in respect of any taxes for which the Company is a taxpayer or a remitter
- the risk of failing to fulfil obligations or fulfilling them late – including in particular the risk of failing to file, or filing late, declarations, documentation, information and statements
- the risk of persons managing the business affairs of the Company, including its financial affairs, being held liable under fiscal penal law



Detailed procedures – including:

- Procedure for the verification of counterparties and transactions in order to exercise due diligence in mitigating tax risks related to purchases of goods for VAT purposes in the Pelion Companies
- Procedure for preventing non-compliance with the obligation to report information on tax schemes
- Procedure for preparing tax documentation in the Pelion Companies
- Reporting procedure in the Pelion Companies, including rules for documenting intangible services
- Procedure for the tax and accounting classification of selected cost items in the Pelion Group companies

Financial and Tax Security Policy of the Pelion Companies

Central procedure for managing the fulfilment of obligations arising from tax law and ensuring their proper performance

Minimising tax risk



The PELION Group Companies are obliged to implement and apply the Financial and Tax Security Policy and the rules set out in the detailed procedures

Acceptable Level Of Tax Risk

Pelion Distinguishes The Following Risk Levels

High level

the probability that the Company's tax treatment of a given business event will be found incorrect is assessed as clearly higher than the probability that it will be found correct

Medium level

the probability that the Company's tax treatment of a given business event will be found incorrect is assessed as the same as (or similar to) the probability that it will be found correct

Low level

the probability that the Company's tax treatment of a given business event will be found incorrect is assessed as clearly lower than the probability that it will be found correct

The acceptable level of tax risk is the low level

RELATIONS WITH TAX AUTHORITIES

01 Applications for individual tax rulings

02 Binding rate information

03 Advance pricing arrangements

04 Other: protective tax opinions, opinions on the application of the WHT exemption, the National Tax Information (KIS) helpline, contact with a dedicated account officer at the Key Taxpayers Service Centre

Dialogue with tax authorities (cooperation based on fair and transparent principles)

The PELION Group Companies take care to cooperate well with the tax authorities. Positive relations are built on mutual respect and a dialogue focused on specific objectives is conducted



Transparency – reporting of tax schemes

Arm's Length Nature Of Transactions With Related Parties



In transactions with related parties, the PELION Group Companies apply the arm's length principle, i.e. they set prices on terms that would have been agreed between unrelated parties.

Achieving the goal

Transactions with related parties are analysed for compliance with the arm's length principle at the time they are concluded and, in the case of multi-year transactions, also in annual cycles.

The PELION Group has a central procedure for preparing tax documentation in the Pelion Companies.

Approach to tax avoidance and tax evasion.

- The PELION Group Companies do not engage in tax planning based on regulations that would allow an artificial or sham reduction of the effective tax burden.

- Before deciding to undertake a given activity, the PELION Group Companies analyse the risk of the general anti-avoidance rule (GAAR) and the specific anti-avoidance rules (SAAR) being applied.

The PELION Group Companies do not take actions that would not be justified by genuine strategic and business needs and would be aimed solely at obtaining tax benefits.

Due diligence in the selection and verification of potential suppliers in order to mitigate the risk of unknowing participation in VAT fraud

WHT due diligence – verification of beneficial owner status

We act responsibly



Avoidance of business relationships and transactions with entities from so-called tax havens

Tax planning only within the limits of applicable law – tax reliefs, operating within tax capital groups, utilisation of tax losses

LET'S STAY IN TOUCH



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Maturity, transparency, security