



# Information on the implemented tax strategy

**GENERAL LOGISTICS SYSTEMS POLAND**

**LLC**



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**GENERAL LOGISTICS SYSTEMS POLAND LIMITED LIABILITY COMPANY**

Registered address: 10 Tęczowa St., 62-052 Głuchowo, NIP: 7851561831, REGON: 631058749

Registration Court: District Court Poznań-Nowe Miasto and Wilda in Poznań, VIII Economic Department - National Court Register



## I. Introduction

This document containing information on the tax strategy implemented by General Logistics Systems Poland Ltd. (hereinafter also referred to as GLS Poland or the Company) for the fiscal year from April 1, 2021 to March 31, 2022 (hereinafter also referred to as the Fiscal Year) has been prepared and published based on the provisions of Article 27c, Paragraph 1 in conjunction with Article 27b, Paragraph 2, Item 2 of the Corporate Income Tax Act of February 15, 1992 (hereinafter referred to as the CIT Act).

## II. Information about GLS Poland

General Logistics Systems Poland is a company operating within the GLS Group. GLS Group provides high-quality, reliable parcel transportation services to more than 250,000 customers, complemented by freight and express services. Through its own domestic companies and partner companies, the GLS Group has built an extensive international network, allowing it to deliver parcels to customers in more than 40 countries. GLS' comprehensive road network makes the company one of the leading providers of courier and express services in Europe. The group also operates through subsidiaries in Canada and on the West Coast of the US.

In Poland, GLS has a network of 50 branches and more than 5,000 "Szybka Paczka" parcel delivery and pickup points, operating in well-connected locations across the country.

GLS attaches particular importance to environmental issues. Since 2008, it has been implementing initiatives focusing on, among other things, responsible use of resources and systematic implementation of environmentally friendly solutions. Sustainability is also one of the key elements of the GLS Group's new Accelerate strategy. This includes the gradual replacement of the fleet with low- or zero-emission vehicles.

GLS Poland's mission statement reads "With passion and openness, we deliver more than parcels. We deliver what we promise through flexible and modern solutions, taking care of the environment. From the people for the people." The new strategy complements this vision, putting customer needs and expectations at the heart of the company. This is the focus of the company's plan for long-term investments related primarily to increasing the potential of GLS' operational network.

The company willingly engages in numerous corporate social responsibility actions, including supporting the Poland Business Run. GLS Poland is a winner of prestigious awards and distinctions- the company was awarded the title of Logistics Leader in the category of Digital Communication Tools and the title of Great Place to Work. The company is also proud of its excellent NPS score, which reflects customer satisfaction.

As of March 31, 2022. GLS Poland had 1193 employees in Poland.

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### **III. Processes and procedures for managing the performance of tax obligations - tax policy**

*Legal basis: Article 27c(2)(1)(a) of the Corporate Income Tax Act*

#### **1. Tax mission of GLS Poland**

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GLS Poland places special emphasis on reliability, correctness, transparency and timeliness of public and legal settlements.

Within the framework of such a mission in the field of taxation, the key values that guide the Company are the correct fulfillment of obligations imposed by law, timely payment of public and legal receivables and reliable fulfillment of reporting obligations.

All of the Company's activities in the field of taxation are part of a widely understood social responsibility. Reliable fulfillment of tax obligations is part of the Company's image as a trustworthy business partner and employer, as well as a responsible taxpayer.

Within the framework of the adopted tax strategy, GLS Poland does not use tax optimization tools or undertake other tax avoidance activities. The Company does not engage in aggressive tax optimizations with the sole purpose of generating a tax benefit and no other economic purpose. The Company only takes advantage of those tax benefits and simplifications that the legislature offers and promotes for all taxpayers.

## **2. Tax risks**

Tax risks that the Company identifies are the frequency of changes in tax laws, their complexity, different positions on the interpretation of their application, short vacatio legis of tax laws.

The Company takes measures to mitigate the above risks, including ongoing monitoring of changes in regulations in publicly available sources, cooperating with tax advisors, auditors, conducting tax audits, in justified cases the Company applies for an individual interpretation of tax law.

## **3. Performance of tax obligations**

At GLS Poland, the Senior Finance Manager and the Chief Accountant, reporting to the Chief Financial Officer, are responsible for the performance of tax duties.

Decisions regarding tax settlements that may cause the greatest tax risks are made after internal consultation, including with the Group Tax Manager, and after consultation with external tax advisors by the CFO.

## **4. Tax procedures**

The Company has implemented a number of measures to properly comply with its tax obligations taxation, including internal processes involving Company employees from various departments. These processes are performed in particular to:

- correct recognition of economic events in tax settlements (e.g. application of correct tax rates, correct recognition of the moment of occurrence of tax liability),
- collection of full documentation related to the tax recognition of the event,

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- proper verification of counterparties, inter alia, within the framework of the so-called due diligence tax due diligence,
- determining the market level of remuneration in transactions with related parties,
- proper fulfillment of formal obligations, in particular timely submission of declarations, returns, tax information, notifications and other required documents,
- timely payment of tax determined in the correct amount.

The Company has procedures in place for the implementation by the Company of its tax obligations. These include in particular, procedures for purchasing and verifying contractors, issuing invoices, bookkeeping, countering the failure to comply with the obligation to provide information on tax schemes, use of company cars.

Persons responsible for the Company's tax settlements continuously monitor the Company's business areas.

Persons employed by the Company in positions related to tax settlements are qualified to perform their duties. They also have access to up-to-date tax knowledge in the form of access to tax and legal systems and portals, the trade press, and regularly participate in training courses and workshops. Employees of the tax and finance teams keep abreast of changes in regulations, interpretations and clarifications by tax authorities.

#### **5. Dobrowolne formy współpracy z organami KAS**

*Legal basis: Article 27c(2)(1)(b) of the Corporate Income Tax Act*

The Company has not joined the "Cooperation Program" referred to in Article 20s of the Tax Ordinance and thus has not entered into an agreement with the Head of KAS on cooperation with respect to taxes within the jurisdiction of the National Tax Administration.

When cooperating with tax authorities, especially in the case of checking activities or possible inspections, the Company shall exercise due diligence to ensure that the checkers/inspectors obtain all information and documents that are required to carry out the aforementioned procedures. Persons authorized to act on behalf of the Company cooperate with the employees of the tax authorities and endeavor to ensure the conditions necessary for the efficient performance of their activities.

### **IV. Information on the implementation of tax obligations in the territory of the Republic of Poland**

*Podstawa prawna: art. 27c ust. 2 pkt 2) Ustawy o podatku dochodowym od osób prawnych*

#### **1. Corporate income tax**

GLS Poland is a corporate income tax payer in connection with its activities in the Republic of Poland. The Company makes the utmost efforts to comply with the obligations imposed by the law with respect

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to filing the required tax returns and information, and has made payments on account of simplified advance payments for income tax and as a payer of lump-sum income tax on income earned on the territory of the Republic of Poland by the taxpayers referred to in Article 3 Section 2 of the CIT Law.

The Company filed its annual tax return for the Fiscal Year within the deadline stipulated in the CIT Law and paid tax in the amount of PLN 36.4 million.

The Company timely prepared transfer pricing documentation and submitted a statement confirming that the transfer prices of controlled transactions covered by the local transfer pricing documentation for the Fiscal Year were determined on terms that unrelated parties would have determined among themselves.

The Company ranks among the 1,000 largest CIT taxpayers in Poland.

## **2. Value Added Tax**

The Company remained registered as an active taxpayer of goods and services tax during the period covered by this Information. During the period from April 1, 2021 to March 31, 2022. The Company submitted returns and records for value added tax in the form of Single Control Files for monthly periods.

## **3. Personal income tax**

During the period from April 1, 2021 to March 31, 2022, the Company acted as a payer of personal income tax for the payment of salaries to its employees and other individuals. The Company filed tax returns and made tax payments in accordance with relevant regulations.

## **4. Local taxes**

The Company was a property taxpayer from April 1, 2021 to March 31, 2022. The Company filed tax returns (DN-1) and made tax payments in accordance with relevant laws.

## **5. Other taxes**

During the period from April 1, 2021 to March 31, 2022. The Company was not subject to any other tax obligations in Poland. In particular, the Company was not obliged to pay tax on civil law transactions, tax on means of transportation, excise tax, or gaming tax.

## **V. Information on the number of information on tax schemes submitted to the Head of KAS**

*Legal basis: art. 27c (2) (2) of the Corporate Income Tax Law*

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During the period from April 1, 2021 to March 31, 2022. GLS Poland did not provide the Head of KAS with information on tax schemes.

## **VI. Information on transactions with related parties**

*Legal basis: art. 27c (2) (3) (a) of the Corporate Income Tax Act*

The Company belongs to an international capital group. In view of this, GLS Poland undertook related party transactions in the period from April 1, 2021 to March 31, 2022. Related party transactions entered into by the Company as part of its day-to-day operations are, as a rule, typical transactions carried out within capital groups. The transactions in question are each time carried out in compliance with the arm's length principle.

During the Fiscal Year, the Company carried out the following transactions with related parties within the meaning of Article 11a (1) (4) of the CIT Act, the value of which exceeded 5% of total assets within the meaning of the accounting regulations, as determined on the basis of the Company's last approved financial statements:

- settlement of international GLS transport network fees (so-called International Internal Clearing);

The value of other transactions with related parties did not exceed the statutory limit indicated above during the period covered by this Information.

## **VII. Information on planned or undertaken restructuring activities**

*Legal basis: art. 27c (2) (3) (b) of the Corporate Income Tax Act*

The Company did not take any restructuring actions during the period from April 1, 2021 to March 31, 2022 that may affect its tax liabilities or those of its related parties. The Company also did not plan to take the aforementioned restructuring actions during the period covered by this Information.

## **VIII. Information on tax settlements in so-called tax havens**

*Legal basis: art. 27c (2) (5) of the Corporate Income Tax Act*

Pursuant to Article 27c(2)(5) of the CIT Law, information on the implemented tax strategy includes information on making tax settlements of the taxpayer in territories or countries practicing harmful tax competition indicated in the executive acts issued pursuant to Article 11j(2) of the CIT Law and pursuant to Article 23v(2) of the PIT Law, and in the announcement of the minister responsible for public finance issued pursuant to Article 86a § 10 of the Tax Ordinance.

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During the period covered by this Information, the Company does not make tax settlements for any taxes in the territories or countries applying harmful tax competition indicated in the aforementioned legal acts.

During the period from April 1, 2021 to March 31, 2022, the Company provided courier services to customers based in Hong Kong. These entities are not related parties to GLS Poland within the meaning of Article 11a(1)(4) of the CIT Act.

## **IX. Other information**

*Legal basis: art. 27c (2) (4) of the Corporate Income Tax Law*

The Company in the period from April 1, 2021 to March 31, 2022 did not apply for:

- ✓ individual interpretation of tax laws - referred to in Article 14b of the Tax Ordinance Act;
- ✓ general tax interpretation - referred to in Article 14a § 1 of the Tax Ordinance Act;
- ✓ binding rate information - referred to in Article 42a of the VAT Act;
- ✓ binding excise information - referred to in Article 7d paragraph 1 of the Excise Tax Act.

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