



## ATI ZKM Forging Sp. z o.o.

Information on the implemented tax strategy for the tax  
year ending Dec. 31, 2023.

In accordance with Article 27c of the Corporate Income Tax Act  
(i.e., JL 2022 item 2587, as amended)

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## I. Admission

### 1. Abbreviations and definitions

Company, Taxpayer	ATI ZKM Forging Sp. z o.o. with based in Stalowa Wola
CIT Act	Act of 15 February 1992 on corporate income tax (Journal of Laws of 2022, item 2587, as amended)
VAT Act	Act of 11 March 2004 on the tax on goods and services (Journal of Laws of 2022, item 931, as amended)
PIT Act	Personal Income Tax Act of 26 July 1991 (Journal of Laws of 2022, item 2647 as amended)
Tax Ordinance	Tax Ordinance Act of 29 August 1997 (Journal of Laws of 2022, item 2651, as amended)
Tax year	Tax year from 1 January 2023 to 31 December 2023
NTA	National Tax Administration
CIT	Corporate income tax
VAT	Value Added Tax
PIT	Personal income tax

### 2. Information about the Company

Company identification data	
<b>Legal form</b>	ATI ZKM Forging Sp. z o.o. (LTD)
<b>Address</b>	Władysława Grabskiego 54, 37-450 Stalowa Wola
<b>NRC</b>	0000065981
<b>TIN</b>	8651002837
<b>NORNEE</b>	830209855
<b>Registry Court</b>	District Court in Rzeszów, XII Commercial Division of the National Court Register

ATI Inc. ("ATI"), a US-based multinational corporation listed on the New York Stock Exchange, considers the publication of this tax strategy to be in line with the obligation resulting from the amendment to the CIT Act effective from 2021 (the so-called "Polish Transaction") for the year ended December 31, 2023. As the parent company of an international group, ATI confirms that this strategy will apply to ATI ZKM Forging Sp. z o.o. ("ATI ZKM") and confirms that this tax strategy has been endorsed by the relevant board(s).

ATI is not only committed to complying with laws and regulations. Our commitment is to reflect the highest level of integrity and ethics in our dealings with ourselves, our customers, our suppliers, our shareholders, the public and the government agencies we work with. ATI ZKM's tax strategy reflects our integrity and ethics and includes all applicable taxes in Poland, including corporate income tax, VAT, withholding at source, customs duties, stamp duties, employee taxes and all other applicable taxes. We fulfill all our tax obligations reliably and on time.

ATI ZKM is part of the ATI multinational group based in the USA and is one of the main manufacturers of drop forgings in Central Europe. The main sales directions are the following industries: aviation, transport, automotive, mining and construction machinery, oil and gas, railway industry and military segment.

ATI ZKM strives for full compliance of the Company's tax settlements with the applicable provisions of tax law. The Company calculates taxes and pays them based on the relevant regulations and in accordance with the actual course of economic events. In the course of its activity, the Company uses available tax reliefs and exemptions according to their purpose.

## II. Elements of Information on the implemented tax strategy

### 1. Tax processes and procedures

**Information on the processes and procedures used by the Taxpayer regarding the management of the performance of obligations arising from the provisions of tax law and ensuring their proper implementation (article 27c section 2 point 1 letter a of the CIT Act).**

The Management Board of the Company and persons supervising the Company's tax settlements make every effort to ensure that the process of managing the performance of obligations arising from the provisions of tax law ensures their proper implementation.

For this purpose, duties in the tax area have been entrusted to persons with adequate qualifications, specialist knowledge and professional experience.

The Management Board and supervisors ensure effective and adequate control of the organization from the perspective of fulfilling the obligations imposed on the Company by tax law, in particular:

- exercises due diligence to ensure the correctness of tax settlements.
- demonstrates a proactive attitude in the range of indicate values and build organizational culture – including transparency of tax settlements.
- puts emphasis on verification of its contractors and business partners, particularly in terms of the place of registered office and conducting business activity.
- invests in broadening employees' knowledge of tax law.

The company uses written procedures – directly or indirectly referring to tax aspects – which are a tool supporting the management process of tax function in order to properly and timely fulfill the Company's tax obligations, in accordance with applicable regulations, while exercising due diligence. The internal procedures and processes implemented in the Company are adequate to its structure, subject of activity and scale of domestic and foreign transactions.

In order to ensure the proper course of processes carried out in the Company and related tax settlements, procedures addressing in particular the following issues were implemented:

- responsibility for the Company's tax settlements, including making tax settlements regarding individual taxes, in particular CIT and VAT, in a manner consistent with the law, as well as the issue of counteracting failure to comply with tax obligations including persons responsible for taking actions such as:
  - identification of tax obligations,
  - making an adequate legal and tax classification,
  - preparation of tax calculations,
  - preparation of information and tax returns,
  - payment of tax payments,
  - exercising control and supervision in this regard.
- making accounting settlements e.g., rules for the closing of the accounting year and months, the control of accounting records and the entry of accounting documents into the records, as well as their storage and archiving.
- flow of information and circulation of documents, affecting the timely identification of tax liabilities.
- Document Management, including the rules for archiving and storing tax documents and responsibility for the circulation of cash.

The Company takes all necessary measures to correctly determine and timely pay public law receivables for instance.:

- identifies events that give rise to tax obligations.
- calculates and pays due taxes on time.
- compiles and transmits SAF-T in mandatory areas.
- provides the tax authorities with the relevant tax returns, statements, reports, and information to which it is obliged by the provisions of tax law.
- prepares transfer pricing documentation, in particular local documentation (Local File) benchmarking and transfer pricing information (TPR-C form).

- monitors transactions concluded from the perspective of the provisions of the Tax Ordinance on tax schemes and reports possible arrangements that constitute a tax scheme to the Head of the National Tax Administration.

The Company also uses the help of external specialists in the case of issues raising serious doubts, in particular when the wording of tax law provisions is not clear. The Company's employees responsible for tax settlements use the following tax consultancy services organized by the tax advisory companies: trainings, industry portals and publications.

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

### **Information on voluntary forms of cooperation with the National Tax Administration used by the Taxpayer (article 27c section 2 point 1 letter B of the CIT Act)**

In the tax year ending 31 December 2023, the Company did not use or participate in voluntary forms of cooperation with the authorities of the National Tax Administration.

The Company strives to maintain open and transparent relations with tax authorities in order to ensure transparency and the correctness of financial settlements.

## 3. Implementation of tax obligations, including information on tax schemes.

### **Information on the performance of tax obligations by the Taxpayer on the territory of the Republic of Poland together with information on the number of information submitted to the Head of the National Tax Administration on tax schemes referred to in article 86a § 1 point 10 of the Tax Ordinance, divided on taxes to which they relate (article 27c section 2 point 2 of the CIT Act).**

The company is a Polish tax resident and fulfils its tax obligations in the field of taxes and fees in the following areas:

- CIT
- VAT
- PIT (as a payer)
- property tax

- forest tax
- customs
- withholding tax (as a payer)

The above settlements are made on time and in accordance with the provisions of generally applicable law.

Within the meaning of the regulations, referred to in article 86a § 1 point 10 of the Tax Ordinance. the company did not identify any tax scheme in 2023.

#### 4. Related party transactions.

**Information on transactions with related parties within the meaning of article 11a sec. 1 point 4 of the CIT Act, the value of which exceeds 5% of the balance sheet total of assets within the meaning of the accounting regulations, determined on the basis of the latest approved financial statements of the company, including entities that are not tax residents of the Republic of Poland (article 27c(2)(3)(a) of the CIT Act).**

In the tax year, the Company carried out the following transaction, that have a value in excess of five percent (5%) of the value of total assets based upon its statutory financial statements i.e. the Company's receivables resulting from transactions carried out under the Cash Pooling agreement.

#### 5. Planned or undertaken restructuring activities.

**Information on restructuring activities planned or undertaken by the taxpayer that may affect the amount of tax liabilities of the taxpayer or related entities within the meaning of article 11a sec. 1 point 4 of the CIT Act (article 27 c section 2 point 3 letter b of the CIT Act).**

In the tax year, the Company did not undertake restructuring activities that could affect the amount of tax liabilities of the Company or its related entities within the meaning of article 11a sec. 1 point 4 of the CIT Act..



6. Applications submitted.

a) for a general tax ruling

**Information on applications submitted by the Taxpayer for a general tax interpretation referred to in article 14a § 1 Tax Ordinance (article 27 c section 2 point 4 letter a of the CIT Act)**

The Company did not apply for a general tax interpretation referred to in article 14a § 1 of the Tax Ordinance in the tax year.

b) for an individual tax interpretation

**Information on applications submitted by the Taxpayer for issuance Individual the tax ruling referred to in article 14; b Tax Ordinance (article 27 c section 2 point 4 lit. b of the CIT Act)**

The company did not apply for issuance in the tax year Individual the tax ruling referred to in article 14b Tax Ordinance.

c) for binding rate information

**Information on applications submitted by the Taxpayer for issuance binding rate information referred to in article 42a of the VAT Act (article 27c sec. 2 point 4 lit. c of the CIT Act).**

The Company did not apply for binding rate information in the tax year referred to in article 42a of the VAT Act.

d) for the issuance of binding excise information

**Information on applications submitted by the Taxpayer for issuance binding excise information referred to in article 7d section 1 of the Excise Duty Act (article 27c section 2 point 4 letter d of the CIT Act)**

The company did not apply for binding information in the tax year excise duty referred to in article 7d sec. 1 of the Excise Duty Act.

## 7. Tax settlements in tax havens

**Information on making tax settlements of the Taxpayer in territories or countries applying harmful tax competition indicated in executive acts issued pursuant to article 11j sec. 2 of the CIT Act of the CIT Act pursuant to article 23v section 2 of the PIT Act and the announcement of the minister competent for public finances issued pursuant to article 86a § 10 of the Tax Ordinance**

The company did not carry out in the tax year tax settlements in territories or countries applying harmful tax competition, indicated in implementing acts issued pursuant to article 11j sec. 2 of the CIT Act pursuant to article 23v sec. 2 of the PIT Act and an announcement of the minister competent for public finances issued pursuant to article 86a § 10 of the Tax Ordinance.