

Information on the implemented tax strategy for 2020

Agora Tax Capital Group

22 December 2021



1. List of terms and abbreviations

For the purposes of this document, the following terms have the following meanings:

2020	Fiscal year commenced on 1 January 2020 and ended on 31 December 2020
Agora	Agora Spółka Akcyjna
Agora TC	Agora TC Spółka z ograniczoną odpowiedzialnością
AMS	AMS Spółka Akcyjna
SSC	Agora S.A.'s financial departments acting as a shared services centre through which Agora S.A. provides bookkeeping services, other accounting matters, tax and financial services to its subsidiaries that are members of the PGK, except for Helios S.A.
Agora Group	A capital group comprising the parent company, Agora S.A., and 19 subsidiaries
Grupa Radiowa Agory (Agora Radio Group)	“Grupa Radiowa Agory” Spółka z ograniczoną odpowiedzialnością
Helios	Helios Spółka Akcyjna
CCC	Act of 15 September 2000 – Commercial Companies Code (consolidated text: Journal of Laws of 2020, item 1526).
Tax Ordinance	Tax Ordinance Act of 29 August 1997 (consolidated text: Journal of Laws of 2021, item 1540).
Agora PGK	Agora Tax Capital Group comprising Agora S.A., Agora TC Sp. z o.o., AMS S.A., “Grupa Radiowa Agory” Sp. z o.o., Helios S.A., Plan A Sp. z o.o., Plan D Sp. z o.o., Yieldbird Sp. z o.o.
Plan A	Plan A Spółka z ograniczoną odpowiedzialnością
Plan D	Plan D Spółka z ograniczoną odpowiedzialnością
Companies served	The following companies: Agora, Agora TC, AMS, Grupa Radiowa Agory, Plan A, Plan D, Yieldbird, for whom accounting services and tax settlements are carried out

by the SSC

by the parent company, Agora, in the form of a shared services centre (SSC)

CIT Act

Corporate Income Tax Act of 15 February 1992 (consolidated text: Journal of Laws of 2021, item 1800).

PIT Act

Personal Income Tax Act of 26 July 1991 (consolidated text: Journal of Laws of 2021, item 1128)

Excise Duty Act

Excise Duty Act of 6 December 2008 (consolidated text: Journal of Laws of 2020, item 722).

Accounting Act

Accounting Act of 29 September 1994 (consolidated text: Journal of Laws of 2021, item 217).

VAT Act

Value Added Tax Act of 11 March 2004 (consolidated text: Journal of Laws of 2021, item 685).

Yieldbird

Yieldbird Spółka z ograniczoną odpowiedzialnością

1. Introduction and legal basis

This document provides information on the tax strategy pursued in 2020 by the Agora Tax Capital Group (Agora PGK) and each of its member companies.

Tax capital groups are obliged to prepare and publish information on the implemented tax strategy for the financial (fiscal) year pursuant to Article 27c(1) of the Corporate Income Tax Act of 15 February 1992.

2. Agora PGK – overview

As at 31 December 2020, the Agora Tax Capital Group comprised the following subsidiaries:

- Agora S.A.,
- Agora TC Sp. z o.o.,
- AMS S.A.,
- “Grupa Radiowa Agory” Sp. z o.o.,
- Helios S.A.,
- Plan A Sp. z o.o.,
- Plan D Sp. z o.o.,
- Yieldbird Sp. z o.o.

The tax capital group was registered for a period of 3 fiscal years from 1 March 2018 to 31 December 2020, and subsequently the registration was extended to 31 December 2021 and to 31 December 2022 by two decisions of the competent tax authorities.

Agora acts as a parent company, representing the tax capital group with respect to obligations arising from the Corporate Income Tax Act and the provisions of the Tax Ordinance, including publishing information on the implemented tax strategy on behalf of the Agora PGK. Agora PGK is registered under tax ID number (NIP) 1080022196.

3. Agora Group – overview

As at 31 December 2020, the Agora Group comprised the parent company, Agora S.A., and 19 subsidiaries. Additionally, the Agora Group held shares in a jointly controlled company, Instytut Badań Outdooru IBO Sp. z o.o., and in associates, ROI Hunter a.s. and Eurozet Sp. z o.o.

Agora has been operating in the media market for more than 30 years. The company started its operations in 1989 with the publishing of the first edition of the nationwide daily newspaper *Gazeta Wyborcza*, which remains one of the most popular dailies in the country. Since 1999, the company has been listed on the Warsaw Stock Exchange. The shareholding structure is published on Agora's website¹. In 2020, Agora and its subsidiaries operated in the following business segments: the Movies and Books, Press, Outdoor, Internet and the Radio. For detailed information about the Group's current operations, see Agora's website².

Key information on each of the companies of the Agora PGK is presented below:

¹ www.agora.pl/akcje-i-akcjonariat

² www.agora.pl

<p>Agora S.A. Address: ul. Czerska 8/10, 00-732 Warsaw Tax ID No (NIP): 5260305644 KRS No: 0000059944</p>	<p>The Company is, among others, the publisher of <i>Gazeta Wyborcza</i>, one of the most popular opinion-forming newspapers in Poland, the <i>Wyborcza.pl</i> website and the <i>Gazeta.pl</i> horizontal portal. The company also publishes books as well as music and film albums.</p> <p>Agora owns also several dozen online brands, including: <i>Sport.pl</i>, <i>Plotek.pl</i>, <i>Wysokieobcasy.pl</i>.</p> <hr/> <p>Number of employees (average headcount) in 2020: 1,237</p>
<p>Agora TC Sp. z o.o. Address: ul. Czerska 8/10, 00-732 Warsaw Tax ID No (NIP): 8992445228 KRS No: 0000105451</p>	<p>The core business of Agora TC is the provision of telecommunications services to members of the Agora Group. The Company does not provide telecommunications services to the public.</p> <hr/> <p>Number of employees (average headcount) in 2020: 8</p>
<p>AMS S.A. Address: ul. Czerska 8/10, 00-732 Warsaw Tax ID No (NIP): 7820021306 KRS No: 0000079299</p>	<p>AMS is the leader in Out-of-Home (OOH) advertising in Poland. It operates in the areas of classic and digital OOH. At the end of 2020, it operated approximately 22,000 advertising spaces.</p> <p>AMS is also a leader in the urban furniture segment in Poland, installing several thousands of bus shelters in over 30 cities.</p> <hr/> <p>Number of employees (average headcount) in 2020: 149</p>
<p>“Grupa Radiowa Agory” Sp. z o.o. Address: ul. Czerska 8/10, 00-732 Warsaw Tax ID No (NIP): 5212897003 KRS No: 0000126767</p>	<p>Agora Radio Group owns three music radio brands of local stations: <i>Złote Przeboje</i>, <i>Rock Radio</i> and <i>Radio Pogoda</i>. The company is also a majority shareholder of a supra-regional <i>Radio TOK FM</i> and operates <i>Tokfm.pl</i> website.</p> <hr/> <p>Number of employees (average headcount) in 2020: 114</p>
<p>Helios S.A. Address: ul. Henryka Sienkiewicza 82/84, 90-318 Łódź Tax ID No (NIP): 7251482632 KRS No: 0000005092</p>	<p>Helios is the largest multiplex cinema network in Poland in terms of the number of facilities. At the end of 2020 the network comprised 50 modern cinemas, 281 screens, 15 Helios Dream rooms and nearly 53,000 seats in total.</p> <hr/> <p>Number of employees (average headcount) in 2020: 366</p>
<p>Plan A Sp. z o.o. Address: ul. Czerska 8/10, 00-732 Warsaw Tax ID No (NIP): 5213807019 KRS No: 0000710312</p>	<p>Plan A's business objects include, among others, business and management consultancy activities. The company was established as part of Agora's strategy to grow its business in the future by investing in new projects.</p> <hr/> <p>The company had no employees in 2020.</p>
<p>Plan D Sp. z o.o.</p>	<p>The Company's core business comprised advertising and other</p>

Address: ul. Czerna 8/10,
00-732 Warsaw

Tax ID No (NIP): 5220102863

KRS No: 0000087256

information technology and computer service activities, including operation of the classifieds website Domiporta.pl until June 2020

Number of employees (average headcount) in 2020: 12

Yieldbird Sp. z o.o.

Address: ul. Czerna 8/10,
00-732 Warsaw

Tax ID No (NIP): 6792996939

KRS No: 0000324436

Yieldbird is a company operating in the advertising sector dedicated to optimizing advertising revenue for medium and large publishers.

Number of employees (average headcount) in 2020: 29

4. Tax processes and procedures



Legal basis: pursuant to Article 27c(2)(1)(a) of the CIT Act, the taxpayer shall provide information on the processes and procedures in place to manage and ensure the proper performance of tax law obligations.

Agora PGK, as well as its individual member Companies, have appropriate tax processes and procedures in place to ensure proper management of performance of tax law obligations. Tax procedures and processes enable the mitigation of tax risks and standardise the tasks of individuals responsible for them both in Agora PGK and in the individual member Companies.

The procedures in place have been developed and implemented taking into account the corporate structure of the respective Companies and the specific nature of the sectors in which Agora PGK operates. Accounting operations and tax settlements are centralized in the parent company – Agora that operates as a Shared Services Centre for all members of Agora PGK, except for Helios. This company has a separate Accounting Department which also handles tax settlements. Within the Agora Group, Helios' Accounting Department collaborates closely with the Agora Group Shared Services Centre, which also includes the Agora SA Tax Department, in terms of accounting for and tax treatment of economic events.

The tax processes and procedures implemented and operated in Agora PGK and in individual Companies are part of the general framework for ensuring high standards and due care in the conduct of the Agora Group's business activities; their general principles are described in the Group's documents, such as:

- Agora Code of Ethics,
- Compliance Risk Charter,
- Procedure for counteracting money laundering and terrorist financing at Agora S.A.,
- Policy for receiving and giving gifts and other benefits at Agora S.A.

These documents are described on a dedicated page on the Agora Group's website³ and set out the core values and rules of conduct applicable across the Agora Group with respect to, among others, compliance with the law, avoidance of corruption, observance of human rights and labor law, and protection of information and personal data. The Agora Group also complies with industry regulations arising from its media and advertising operations.

³ <https://raportcsr-2020.agora.pl/etyka-i-prawa-czlowieka-w-aporze>

Compliance with the highest ethical standards, applicable laws, internal regulations and external codes of conduct is ensured by an extensive compliance system, including the aforementioned Agora's Code of Ethics and Compliance Risk Charter, as well as numerous measures (e.g. cyclical compliance risk assessment) taken by the Compliance Officer.

Agora has been listed on the Warsaw Stock Exchange since 1999. Therefore, Agora PGK, in a specific way through Agora, is committed to ensure proper communication with its investors and shareholders and pursues a transparent information policy. It complies, among others, with best practice for listed companies - since the first edition of "The Code of Best Practice for WSE Listed Companies"⁴ came into force in 2002 - and observes the highest reporting standards, which entails publishing periodic separate and consolidated financial statements for the Agora Group on a dedicated website⁵.

Tax settlements

The basic rules of conduct in tax matters of Agora PGK and its member Companies are based on tax legislation and the current line of interpretation and case law. Bookkeeping and tax settlement operations are centralized for all members of Agora PGK, with the exception of Helios. A Tax Department has been separated within the organizational structure of the SSC to coordinate activities and centralize the approach to legal and tax issues. By centralizing tax settlements in the Shared Services Centre, the processes and procedures in place in the Companies supported by the SSC can be harmonized and standardized.

Helios has a separate Accounting Department which also handles tax settlements. Nevertheless, the close collaboration between the Helios' Accounting Department and the SSC, guaranteed, among others, by cooperation in fulfilling the information obligations for WSE-listed companies, ensures a uniform approach to the preparation of tax settlements in Helios in relation to the companies supported by the SSC and, consequently, in the entire Agora PGK.

The objective of both, the Companies supported by the SSC and Helios, is the timely reporting, submission of returns and payment of tax liabilities, as well as the fulfillment of other tax law obligations. The aforementioned entities make every effort to ensure that the tax returns filed and other documents submitted to the tax authorities are consistent with the facts and are based on properly maintained documentation.

Among the documents supporting the existing tax processes, a key role is played by the procedures regulating important issues and obligations from the perspective of Agora PGK and its member Companies, such as those related to:

- reporting for VAT purposes,
- checking the correctness of the tax treatment of costs and the deduction of input VAT on purchase transactions,
- exercising due diligence with regard to withholding tax,
- countering the failure to comply with obligations to provide information on tax schemes (MDR),
- tax settlements as part of the operation of the Tax Capital Group.

Moreover, the existing tax processes are supported by such documents as schedules, instructions, internal verification lists or flowcharts depicting selected processes regarding the performance of tax obligations.

The performance of the duties imposed by tax law on Agora PGK and its member Companies has been entrusted to qualified employees with extensive understanding of tax law. Processes related to tax classification of events, keeping of accounts and records, collection of required documentation and reporting relevant tax data both in Agora Group and its member Companies are organised in such a way as to ensure compliance of tax settlements with the applicable tax laws and to secure the correct performance of these activities.

⁴ <https://www.gpw.pl/dobre-praktyki2021>

⁵ <https://www.agora.pl/raporty>

Collaboration with business departments

Collaboration with the Companies' business departments occurs on an ongoing basis based on developed operating models. Information necessary for the preparation of tax settlements and the fulfilment of tax obligations is provided to the departments dealing with tax settlements without undue delay. Where necessary, business departments support the SSC and the Helios' Accounting Department in the completion of additional information and data and provide assistance in understanding the specifics of the business sector in question in order to properly reflect transactions according to the applicable tax law.

Tax risk management and internal controls

Agora PGK ensures that due care is exercised and potential tax risks are minimised by implementing appropriate controls and monitoring the processes and settlements applied by both, the SSC and Helios. The level of risk is assessed based on internal expertise with the support of the SSC Tax Department or by engaging with external tax advisors.

Agora PGK is committed to ensuring that its managers have adequate knowledge of its tax affairs. As Agora is a listed company, tax issues are discussed periodically prior to the publication of separate and consolidated financial statements for stock exchange reporting purposes.

Information management and record-keeping

In the area of tax settlements, Agora PGK and its member Companies use specialised IT tools, comprising in particular sophisticated accounting systems that ensure correct and complete recording of the data collected. The IT tools used by the Agora Group are tailored to the current needs, corresponding to the business activities and sectors in which PGK Agora operates, and allow for the correct preparation and filing of tax returns and fulfilment of other statutory obligations.

Employees of the Company

All employees of the Agora PGK Companies are required to comply with the law, as well as to observe the highest ethical standards required by both internal and industry requirements.

PGK Agora ensures that the substantive knowledge of the employees involved directly and indirectly in the tax processes, i.e. the employees of the SSC, including the Tax Department, Financial Reporting, Accounting and Financial Sales Support and employees of the Accounting Department of Helios, is updated on a regular basis. This is done through the distribution of information materials, participation in tax training courses, including those organised by third parties, and the use of available websites dedicated to tax issues. In addition, the SSC disseminates tax expertise to other employees (including those of the Controlling Department and operational departments) in order to increase their awareness in the area of taxation and to make them more effective in achieving their objectives in this area.

5. Information on performance of tax-related obligations



Legal basis: pursuant to Article 27c(2)(1)(a) of the CIT Act, the taxpayer shall provide information on the processes and procedures in place to manage and ensure the proper performance of tax law obligations.

Agora PGK makes all necessary efforts to ensure that the information reported on tax obligations reflects the facts in a clear and precise manner, is up-to-date, complete and understandable.

The main taxes in respect of which Agora PGK and its member Companies performed their tax-related obligations included: corporate income tax (CIT), value added tax (VAT), personal income tax (PIT), tax on civil law transactions (PCC), withholding tax (WHT), environmental levies and taxes, as well as social security and health insurance contributions on salaries and wages paid to employees (ZUS).

Individual data of Agora PGK as a payer of CIT are published on a regular basis in accordance with Article 27b(2) of the CIT Act on the website⁶ of the Ministry of Finance.

6. Voluntary forms of cooperation with the National Revenue Administration authorities



Legal basis: pursuant to Article 27c(2)(1)(b) of the CIT Act, the taxpayer shall provide information on voluntary forms of cooperation with the National Revenue Administration authorities.

In 2020, neither Agora PGK nor any of its member Companies, benefited from voluntary forms of cooperation with the National Revenue Administration authorities.

7. Tax schemes



Legal basis: pursuant to Article 27c(2)(2) of the CIT Act, a taxpayer shall provide information on the taxpayer's fulfilment of tax obligations in the territory of the Republic of Poland, together with information on the number of tax schemes referred to in Article 86a § 1(10) of the Tax Ordinance, broken down by the taxes to which they relate, reported to the Head of the National Revenue Administration.

To ensure correct and timely fulfillment of the obligation to report tax schemes, Agora PGK has developed and implemented a procedure setting out the activities and steps to be taken to fulfill the obligations to identify and report information on tax schemes (MDR).

Neither Agora PGK nor any of its member Companies identified any tax schemes in 2020. Therefore, neither PGK Agora nor any of its member Companies were obliged to report to the Head of the National Revenue Administration information on tax schemes referred to in Article 86a § 1(10) of the Tax Ordinance.

At the same time, please note that due to the Covid-19 pandemic, the statutory MDR reporting deadlines have been suspended from 31 March 2020 until the 30th day after the date of revocation of the epidemic emergency and epidemic status announced in connection with COVID-19.

⁶ www.gov.pl/web/finanse/2020-indywidualne-dane-podatnikow-CIT

8. Related-party transactions



Legal basis: pursuant to Article 27c(2)(3)(a) of the CIT Act, taxpayers shall provide information on transactions with related parties, within the meaning of Article 11a(1)(4) of the CIT Act, whose value exceeds 5% of total assets within the meaning of accounting regulations, as determined on the basis of the company's most recent approved financial statements, including entities that are not tax residents of the Republic of Poland.

Member Companies of Agora PGK carried out the following transactions with related parties within the meaning of Article 11a (1)(4) of the CIT Act, whose value exceeds 5% of total assets within the meaning of accounting regulations:

<p>Agora</p>	<p>Within the meaning of accounting regulations, Agora's total assets, as determined on the basis of the financial statements for 2020, amounted to PLN 1,041,990,306 as at 31 December 2020.</p> <p>In 2020, Agora executed the following transactions with related parties within the meaning of Article 11a(1)(4) of the CIT Act, whose value exceeded 5% of its total assets (i.e. PLN 52,099,515):</p> <ol style="list-style-type: none"> 1. receipt of a surety under a bank guarantee from a Polish entity, 2. participation in Agora's group cashpooling structure.
<p>Agora TC</p>	<p>Within the meaning of accounting regulations, Agora TC's total assets, as determined on the basis of the financial statements for 2020, amounted to PLN 2,170,014 as at 31 December 2020.</p> <p>In 2020, Agora TC executed the following transactions with related parties within the meaning of Article 11a(1)(4) of the CIT Act, whose value exceeded 5% of its total assets (i.e. PLN 108,501):</p> <ol style="list-style-type: none"> 1. sale of data transmission services to a Polish entity, 2. sale of telecommunications services to Polish related parties, 3. lease of telecommunications equipment and optical fibers from an entity with tax residency in Poland, 4. participation in Agora's group cashpooling structure.
<p>AMS</p>	<p>Within the meaning of accounting regulations, AMS' total assets, as determined on the basis of the financial statements for 2020, amounted to PLN 280,034,130 as at 31 December 2020.</p> <p>In 2020, AMS executed the following transactions with related parties within the meaning of Article 11a(1)(4) of the CIT Act, whose value exceeded 5% of its total assets (i.e. PLN 14,001,706):</p> <ol style="list-style-type: none"> 1. receipt of a surety under a bank guarantee from an entity with tax residency in Poland, 2. participation in AMS' group cashpooling structure.
<p>Grupa Radiowa Agory (Agora)</p>	<p>Within the meaning of accounting regulations, Agora Radio Group's total assets, as determined on the basis of the financial statements for 2020, amounted to PLN 88,185,916</p>

Radio Group)	<p>as at 31 December 2020.</p> <p>In 2020, Agora Radio Group executed the following transactions with related parties within the meaning of Article 11a(1)(4) of the CIT Act, whose value exceeded 5% of its total assets (i.e. PLN 4,409,296):</p> <ol style="list-style-type: none"> 1. sale of advertising time on radio stations and websites to a Polish entity, 2. providing surety under a bank guarantee to an entity with tax residency in Poland, 3. participation in Agora's group cashpooling structure.
Helios	<p>Within the meaning of accounting regulations, Helios' total assets, as determined on the basis of the financial statements for 2020, amounted to PLN 767,664,094 as at 31 December 2020.</p> <p>In 2020, Helios did not execute transactions with related parties within the meaning of Article 11a(1)(4) of the CIT Act, whose value exceeded 5% of its total assets (i.e. PLN 38,383,205).</p>
Plan A	<p>Within the meaning of accounting regulations, Plan A's total assets, as determined on the basis of the financial statements for 2020, amounted to PLN 23,683 as at 31 December 2020.</p> <p>In 2020, Plan A executed the following transactions with related parties within the meaning of Article 11a(1)(4) of the CIT Act, whose value exceeded 5% of its total assets (i.e. PLN 1,184):</p> <ol style="list-style-type: none"> 1. lease of office premises from a Polish entity, 2. purchase of accounting services from an entity with tax residency in Poland.
Plan D	<p>Within the meaning of accounting regulations, Plan D's total assets, as determined on the basis of the financial statements for 2020, amounted to PLN 3,096,871 as at 31 December 2020.</p> <p>In 2020, Plan D executed one transaction with related parties within the meaning of Article 11a(1)(4) of the CIT Act, whose value exceeded 5% of its total assets (i.e. PLN 154,844) – it was the participation in Agora's group cashpooling structure.</p>
Yieldbird	<p>Within the meaning of accounting regulations, Yieldbird's total assets, as determined on the basis of the financial statements for 2020, amounted to PLN 43,435,460 as at 31 December 2020.</p> <p>In 2020, Yieldbird executed the following transactions with related parties within the meaning of Article 11a(1)(4) of the CIT Act, whose value exceeded 5% of its total assets (i.e. PLN 2,171,773):</p> <ol style="list-style-type: none"> 1. lease of internet advertising space from Polish entities, 2. participation in Agora's group cashpooling structure.

9. Restructuring activities



Legal basis: pursuant to Article 27c(2)(3)(b), taxpayers shall provide information on restructuring activities planned or undertaken by the taxpayer, which may affect the amount of tax liabilities of the taxpayer or its related entities in the meaning of Article 11a(1)(4) of the CIT Act.

In 2020, Agora PGK and its selected member Companies undertook or planned the following restructuring activities, which could affect the amount of tax liabilities of the Company or its related entities within the meaning of Article 11a(1)(4) of the CIT Act:

<p>Agora</p>	<p>On 1 October 2020, Agora merged with Agora Poligrafia Sp. z o.o. pursuant to Article 492 § 1(1) of the CCC, i.e. by transferring all assets of Agora-Poligrafia to Agora. Agora remained the sole shareholder of Agora-Poligrafia and hence the merger was effected in a simplified manner pursuant to Article 516 § 6 of the CCC, without any increase in Agora's share capital and without any amendment to its articles of association. Agora-Poligrafia was dissolved on the date of the merger without liquidation proceedings and removed from the Register of Entrepreneurs of the National Court Register.</p> <p>On 23 April 2020 and 16 September 2020, the Extraordinary General Shareholders' Meetings of Goldenline Sp. z o.o. (wholly owned by Agora) adopted resolutions to increase the company's share capital (i) from PLN 300,000 to PLN 400,000 through the creation of 100 new shares with a par value of PLN 1,000 each and with a total par value of PLN 100,000 and (ii) from PLN 400,000 to PLN 3,221,000 through the creation of 2,821 new shares with a par value of PLN 1,000 each. The newly created shares were offered for subscription by the sole shareholder of this company, i.e. Agora, in exchange for cash contributions.</p>
<p>AMS</p>	<p>On 17 December 2020, subsidiaries of AMS , i.e. Piano Group sp. z o.o., Benefit Multimedia sp. z o.o. and Benefit Multimedia sp. z o.o. SKA were merged pursuant to Article 492 § 1(1) of the CCC, i.e. through the transfer of all assets of Benefit Multimedia sp. z o.o. and Benefit Multimedia sp. z o.o. SKA to Piano Group sp. z o.o. (merger by acquisition pursuant to Article 492 § 1(1) of the Commercial Companies Code); without an increase in the share capital of the acquirer.</p> <p>Optimizers Sp. z o.o., a subsidiary of AMS, planned the takeover of certain assets and functions from other companies of the AMS group, related to the operation of digital media and advertising on these media, in 2021.</p>
<p>Plan D</p>	<p>On 9 June 2020, Plan D sold an enterprise, within the meaning of Article 55' of the Civil Code, constituting an organized group of tangible and intangible assets intended for conducting business activity, in particular involving, among other things, running an internet classifieds website under the name of Domiporta.pl, making it possible to place and view classifieds concerning real estate, to Auto Centrum Sp. z o.o., with its registered office in Krosno.</p>
<p>PGK</p>	<p>On 8 December 2020, a decision was issued by the Head of the Second Mazovian Tax Office in Warsaw to register an agreement to extend the period of operation of the Agora</p>

Additional information on the restructuring activities planned or undertaken by the taxpayer is provided in the [Consolidated Financial Statements](#) for the Agora Group for 2020.

10. Tax settlements in territories or countries applying harmful tax competition



Legal basis: pursuant to Article 27c(2)(5) of the CIT Act, taxpayers shall provide 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(2) of the CIT Act and pursuant to Article 23v(2) of the PIT Act and in the announcement of the minister competent for public finance issued pursuant to Article 86a § 10 of the Tax Ordinance.

In 2020, neither Agora PGK nor any of its member Companies, executed tax settlements in territories or countries applying harmful tax competition as defined in executive acts issued on the basis of Article 11j(2) of the CIT Act and pursuant to Article 86a § 10(1) of the Tax Ordinance. In particular, in these territories/countries, neither Agora PGK nor any of its member Companies in 2020:

- was registered as an active payer of any tax,
- submitted any tax returns or forms,
- withheld and paid taxes.

11. Motions submitted



Legal basis: Pursuant to Article 27c(2)(4) of the CIT Act, taxpayers shall provide information on motions filed for the issue of:

- a) a general tax ruling referred to in Article 14a § 1 of the Tax Ordinance,
- b) a tax law ruling referred to in Article 14b of the Tax Ordinance,
- c) a binding rate information referred to in Article 42a of the VAT Act,
- d) a binding excise duty information referred to in Article 7d(1) of the Excise Duty Act.

In 2020, neither Agora PGK nor any of its member companies filed any motions for the issue of:

- a general tax law ruling referred to in Article 14a § 1 of the Tax Ordinance,
- a binding rate information referred to in Article 42a of the VAT Act,
- a binding excise duty information within the meaning of Article 7d(1) of the Excise Duty Act.

In 2020, Agora PGK filed a joint motion with its member Companies for an individual corporate income tax (CIT) ruling in respect of extending the operation of the tax capital group. Furthermore, Helios filed a motion for

an individual ruling on the grounds of the VAT Act in connection with the conclusion of a long-term lease agreement.