INFORMATION LEAFLET FOR CLIENTS

Information for individuals with foreign (non-Polish) tax residency status investing (outside of business activity) in financial instruments issued by entities from Poland, EU and the United States of America

This information indicates the tax consequences of typical investments and is not legal or tax advice. Individual factors may change the tax implications, therefore, it is recommended to consult a tax advisor before settling investment products. Information prepared and valid according to the state as of November 12, 2025.

Polish-sourced income under the Personal Income Tax Act primarily includes i.a.:

a) **Income from publicly traded securities/derivatives:** Profits from selling or exercising rights related to securities and derivative financial instruments traded on a Polish regulated stock exchange.
b) **Income from transfer of ownership (shares/rights) in entities with significant Polish real estate:** This applies if at least 50% of the entity's assets (directly or indirectly) consist of real estate in Poland.
c) **Income from transfer of ownership in a Polish real estate company:** Specifically, income from transferring shares or similar rights in a company defined as a "real estate company" under Polish tax law.
d) **Income from receivables settled by legal persons having their place of residence, registered office or management board in the territory of the Republic of Poland:** Specifically income from dividends, interest, etc.

It means that if you are **not** a Polish tax resident and you invest in securities of American or EU companies (which are not listed on the Polish stock exchange, their value does not mainly derive from real estate located in Poland, and they are not "real estate company" under Polish tax law) then in general you **do not have tax obligations in Poland regarding these investments.**

This means that UniCredit will not issue a Polish PIT-8C document or other tax declarations for you to the Polish tax office. If a non-resident invests in Polish securities (e.g., shares of companies based in Poland, bonds of Polish issuers), UniCredit may be required to withhold tax on the amounts paid and issue an IFT-1R (not a PIT-8C, which applies to income from securities trading). In the case of the sale of Polish securities by a non-resident, UniCredit issues a PIT-8C if the conditions for determining that the income is sourced in Poland are met.

Nevertheless, the Bank is obliged to transfer information about your investments within the framework of international standards (CRS/FATCA) and in accordance with regulatory provisions. You will also receive information about your transactions from the Bank. UniCredit transfers data on non-resident accounts to the Polish tax authorities, which then forward it to the tax authorities of the client's country of residence as part of the automatic exchange of information (CRS).

Therefore, it is important for the client to ensure that the data provided to the bank (particularly the country of tax residence and tax identification number) is current and accurate.

1. Taxation of foreign investment income: EU and the United States

When investing in American or EU securities, it is crucial to highlight that under certain conditions income may be subject to taxation in both the USA, EU and Poland. This is a key issue that should always be included in your annual tax

settlements. In addition, please note that any amount earned with us will be reported to relevant tax authorities.

Tax liability in Poland may arise if a non-resident earns income from Polish sources (e.g. dividends from Polish companies, interest on Polish bonds, or profits from the sale of Polish shares). In such cases, UniCredit, as the payer, collects withholding tax at the domestic or treaty rate (if the client provides a valid tax residency certificate) and issues an IFT-1R.

Remember: The fact that you do not have tax obligations in Poland does not mean that you are exempt from paying taxes altogether. You will have to settle your income from these investments in accordance with the tax regulations of the country of your tax residence.

2. Dividends and interest from Poland: withholding tax and settlement in Poland

- **Tax obligation in Poland:** Income from Polish-sourced dividends is subject to a 19% tax rate in Poland (the so-called "Belka tax").
- **Non-resident clients** must submit a valid **tax residency certificate** through our systems in order to be eligible for preferred tax treatment. Once we receive and verify it, we are entitled to apply the lower withholding tax rates (for dividends and interest from Poland) resulting from the relevant tax treaty. Failure to provide a certificate requires us to collect the domestic rate (19%).
- **In most cases, dividend/interest recipients are entitled to credit the amounts of tax paid in Poland against tax in their country of residence.**

UniCredit is obliged to prepare and submit the IFT-1/IFT-1R information to the non-resident and the Polish tax office. The IFT-1R contains detailed information on all non-resident income earned in Poland (e.g. dividends, interest, other passive

income) and withholding tax withheld. This document is crucial for a non-resident to settle taxes in their country of residence and avoid double taxation.

IFT-1 and IFT-1R Reporting:

- **IFT-1R (annual information):** Mandatory information prepared by the Bank after the end of the tax year (by the end of February of the following year) for any non-resident who is subject to Polish withholding tax. It contains data about the payer, taxpayer, type of payment, total amounts of income and withholding tax collected.
- **IFT-1 (upon request):** Information submitted upon your written request during the year (within 14 days of submitting the request). Its preparation does not release the Bank from the obligation to issue IFT-1R after the end of the year.
- **Important:** UniCredit is obliged to prepare IFT-1R even if it has not collected withholding tax due to the application of an exemption or a 0% rate resulting from regulations (e.g., from a double tax treaty). This form serves a purely informational function for the tax office.

3. Taxation of capital gains from the sale of foreign financial instruments

- **Capital gains in Poland:** Profits obtained from the sale of foreign financial instruments, e.g. shares, ETFs, are subject to a 19% tax rate in Poland when these securities are listed on the Polish stock exchange or their value derives mainly from real estate located in Poland or they have a status of Polish "real estate company" under Polish tax law),
- **Bank's reporting obligations:** In such a case the Bank, as an entity maintaining an investment account, will issue a PIT-8C information form. This document contains data on revenues and costs related to the sale of financial instruments, which are necessary for self-settlement of tax in the annual PIT-38 return. The deadline for submitting PIT-38 and paying tax is April 30 of

the year following the tax year.

- For investments in financial instruments issued by entities from other countries (e.g., USA, EU countries), withholding tax may be levied in the issuing country in accordance with local regulations and double taxation treaties. Clients should independently settle the tax on this income in their country of residence, using the documents and statements provided by the bank.

4. Important general information:

- **Currency exchange rate conversion:** For the purpose of preparing PIT-8C, revenues and costs expressed in foreign currencies (EUR, USD, etc.) are converted to PLN according to the average NBP exchange rate from the last working day preceding the day of earning income (sale) or incurring costs (purchase):

  (i) Revenues are converted to PLN according to the NBP exchange rate from the last working day preceding the day of earning income (e.g., sale of securities).

  (ii) Acquisition costs are converted to PLN according to the NBP exchange rate from the last working day preceding the day of incurring costs (e.g., purchase of securities).

- Actual exchange rates applied by UniCredit do not apply for tax purposes.
- **One PIT-8C form:** Even if you have more than one investment account at UniCredit, the Bank will issue only one PIT-8C form for a given tax year, summing up all transactions.

  (i) The Bank maintains separate FIFO settlements for each client's investment account, but sums the results from all accounts in PIT-8C.

(ii) The client does not need to independently aggregate data from several accounts maintained at UniCredit – the bank issues one collective PIT-8C.

5. Potential additional charges in other markets

It is worth noting that, in addition to the USA, some countries may have additional tax obligations, for instance financial transaction tax or capital gains tax withheld at source.

6. Overview of taxes and fees in European jurisdictions

Country	Tax / Fee	Rate	Notes	Type
France	French Financial Transaction Tax (FTT)	0.4% of the value of shares purchased	Applies to net purchases of shares of companies with a market capitalization above EUR 1 billion.	Tax
Spain	Spanish Financial Transaction Tax (FTT)	0.2% of the value of shares purchased	Applies to net purchases of shares of companies with a market capitalization above EUR 1 billion.	Tax
USA	SEC levy	$20.60 per million dollars of sales transaction value	New rate (from April 4, 2026)	Fee
United Kingdom	UK Stamp Duty Reserve Tax (for securities issued by entities located in Ireland)	1% of the purchase transaction value	No additional notes.	Tax

United Kingdom	UK Stamp Duty Reserve Tax (for securities issued by entities located outside Ireland)	0.5% of the purchase transaction value	No additional notes.	Tax
United Kingdom	PTM Levy	GBP 1 per transaction if the total transaction value exceeds £10,000	The PTM Levy is payable on transactions in securities of these companies registered in the United Kingdom, the Channel Islands or the Isle of Man whose shares are admitted to trading on a UK regulated market or multilateral trading facility.	Fee
Italy	Italian Financial Transaction Tax (FTT)	0.1% of the value of shares purchased	The tax does not apply to net purchases of shares of companies with a capitalization below EUR 500 million.	Tax

Summary

The information above is for informational purposes only and does not constitute tax advice. UniCredit strives to explain the basic principles of investment taxation but does not provide tax advisory services. In case of doubts regarding tax obligations, you should contact a professional tax advisor or seek information from the tax office. Please remember that tax regulations may change, and your individual situation (e.g. combining income from various sources) may affect how you settle your taxes. In the event of a change in tax residency (e.g. returning to Poland or changing the country of residence), the client should immediately inform the bank and update their documentation, as taxation and reporting rules change. UniCredit would like to

emphasise that ultimately the client is responsible for the correct settlement of taxes in the country of residence, and the bank does not provide tax advisory services.

We recommend that you always verify information regarding your investment income and consult a tax advisor in case of any doubts.