



# Tax Transparency Report 2022



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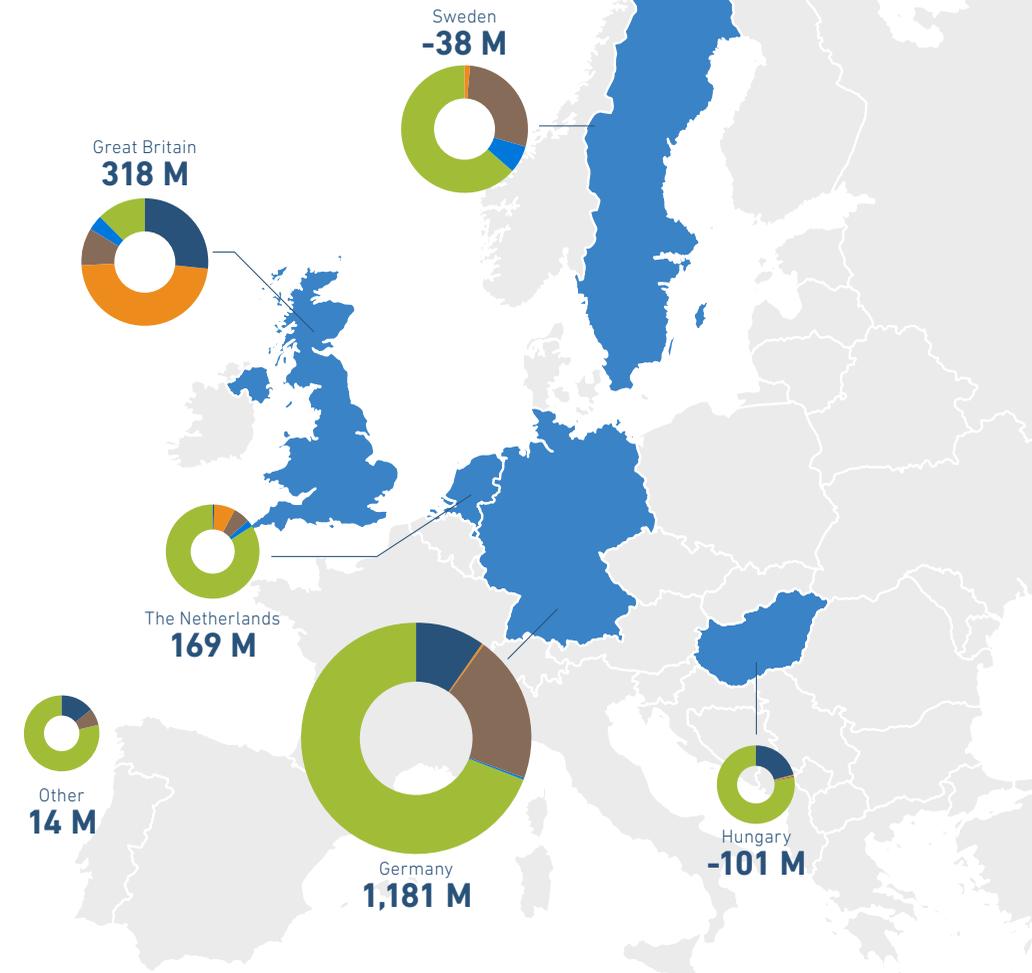
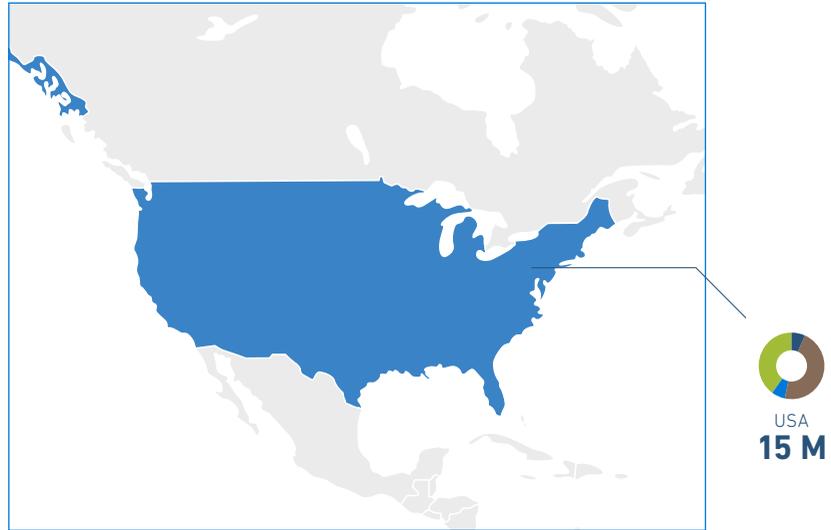
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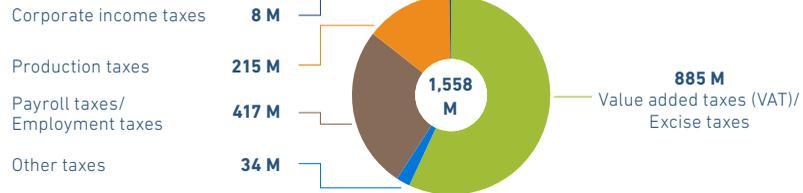
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# Uniper's tax contribution

## Tax contribution by country (€)



## Total tax contribution



### Notes:

- Rounding may result in minor deviations from the totals (see the Country-by-Country Reporting chapter).
- Unipro, our Russian business unit, was deconsolidated from our consolidated financial statements as of December 31, 2022 and had to be classified as discontinued operations (see the Uniper Annual Report 2022). Consequently, this report contains no presentation of these activities.

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## Foreword

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Saving and supporting our company gives us a special obligation to use our resources and financial means responsibly.

**Dr. Jutta A. Dönges**, Chief Financial Officer



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# Foreword

As Uniper’s CFO, I’m delighted to present another edition of our Tax Transparency Report.

Our third report published continues to present our tax positions simply and transparently.

Our company is responsible for its actions toward shareholders and stakeholders. This includes paying a fair share of taxes in the countries where we operate. Potentially all of our operations could impose tax obligations in these countries. Uniper paid a total of nearly €1.6 billion in taxes worldwide in 2022. If you’re wondering what a “fair share” of taxes is, I recommend that you consult our prior-year report, in which we answered precisely this question.

All countries rely on tax revenues, which are essential for their long-term development. Tax revenues enable governments to fulfill their obligations toward citizens. They widen governments’ scope to take action and support. They have a positive impact on societal development, for example by funding investments in education, culture, environmental protection, infrastructure and security.

The main tasks of our business are to supply security and propel the energy transition. We’re very grateful to have the German government (“Bund”) as a partner at our side to support our company in this current existential crisis. The stabilization measures that have been adopted enabling us to continue to perform our tasks and make our contribution to ending the crisis. Of course, we take full account of the requirements and conditions associated with the stabilization measures.

It’s extremely important for us not only to pay our share of taxes, but especially also to use the money made available to us by the Bund responsibly and moderately. Consequently, we also feel a special obligation to report transparently on our tax contribution.

Like the prior-year reports, this one is based on GRI 207: Taxes, a Global Reporting Initiative (GRI) standard for sustainable tax reporting. In particular, this report includes commentary on our tax approach, tax transparency, internal tax governance setup, proactive information sharing, and cooperative and constructive collaboration with tax authorities. Commentary on our internal control and risk management system is a key feature.

These topics are essential to our tax compliance management system and help us ensure that the taxation of each of our business units is appropriate and lawful.

Last year’s report presented examples of the importance of digitalization for our tax function and how automation accelerates and optimizes our processes. This year we provide a brief update on this topic.

The current topic of this year’s issue is 19-16-19-7 tax relief for end-consumers. This practical example is intended to illustrate the challenges that the temporary VAT reductions pose for our company and how we’re helping ensure that these tax reductions reach end-consumers.

This Tax Transparency Report is an update of the reports for prior years. Readers may therefore be familiar with some passages. However, especially the aforementioned update on the digitalization of our tax function, the new focus topic, and country-specific reporting of our tax figures provide further insights into our tax matters.

I hope you enjoy reading the report.

Dr. Jutta A. Dönges  
Chief Financial Officer

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## Uniper SE: who we are

Düsseldorf-based Uniper is an international energy company with activities in more than 40 countries. With around 7,000 employees, it makes an important contribution to security of supply in Europe. Uniper’s core businesses are power generation in Europe, global energy trading, and a broad gas portfolio.

Uniper procures gas—including liquefied natural gas (LNG)—and other energy sources on global markets. We own and operate gas storage facilities with an aggregate capacity of more than 7 billion cubic meters. We plan for our roughly 22.5 GW of installed power-generating capacity in Europe to be carbon-neutral by 2035. We already rank among Europe’s largest operators of hydroelectric plants.

In the field of renewable energy generation, Uniper has a business unit for European onshore wind and solar power plants, which bundles competences in the development as well as in the operation, marketing and management of solar and wind power plants. We intend to further expand solar and wind energy, which are essential for a more sustainable and autonomous future. Growth is targeted both through the development and subsequent sale of the renewable projects and through the operation of the owned renewable projects.

Uniper is a reliable partner for communities, municipal utilities, and industrial enterprises. We plan and implement innovative, lower-carbon solutions that propel their decarbonization journeys.

Therefore, Uniper is contributing to a more sustainable and lower-carbon world while supporting the energy transition. At the same time, Uniper is committed to making a significant contribution to security of supply.

Empower  
Energy  
Evolution

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# Sustainability at Uniper: our responsibility toward society

Climate change is one of the biggest global challenges today. To address this challenge and to achieve the goals of the Paris Agreement, the aim is to significantly reduce emissions. Worldwide, 189 countries have signed or otherwise joined the Paris agreement. At the beginning of 2020, the European Parliament passed a resolution strengthening the EU’s climate targets, aiming to reduce CO2 emissions by 55% by 2030 compared to the base year 1990 and to achieve climate neutrality by 2050.

We have committed to becoming carbon neutral by 2050. The transformation path is being continuously driven forward in all business areas.

To achieve this ambitious transformation, Uniper is focusing on growing existing green businesses and establishing green businesses. Two of the most important business areas established in this context are: Hydrogen and Renewable Power Generation.

As a hydrogen player, Uniper has already gained many years of experience in operating hydrogen plants, as Uniper was one of the first European utilities to produce green hydrogen based on electrolysis processes.

Uniper has developed an extensive pipeline of projects aimed at producing low-carbon hydrogen in Europe as well as importing and trading hydrogen and its derivatives, such as ammonia, methanol, and sustainable fuels.

In the years ahead, we will focus on bringing these projects to fruition in order to supply the low-carbon hydrogen that Germany and Europe need for a successful energy transition.

Our existing gas and storage infrastructure and our many years of experience in procurement, optimization, and trading give Uniper a very good position in the emerging hydrogen market as well as the dynamically developing biomethane market.

Uniper’s subsidiary Uniper Renewables maintains a diversified platform for developing solar and onshore wind projects in its core European markets, with the capacity to bring more than 1 GW of generation capacity per year to ready-to-build status by the end of 2025 at the latest. Today Uniper already has a 3 GW pipeline of projects that could reach construction readiness by 2026. More than 1 GW of them is backed by secured greenfield and co-development projects.

In addition, Uniper contributes to the decarbonization of its customers’ infrastructure that is necessary for supply security. This involves offering green industrial solutions that enable customers to decarbonize their own processes and products.

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# Sustainability at Uniper: our responsibility toward society

In the European Generation segment, Uniper is self-committed to reduce greenhouse gas emissions by at least 50% by 2030 compared to 2019. Furthermore, Uniper aims to reach carbon neutrality in the European Generation by 2035. A total of 5 GW of carbon-free generation capacity, consisting of hydro generation in Germany and Sweden as well as nuclear generation in Sweden, represent the backbone of Uniper's carbon free generation portfolio.

The path to reach the decarbonization goals comprises mainly a clearly defined coal phase-out strategy and decarbonization of the gas-fired generation fleet.

Furthermore, Uniper has committed to reducing its indirect (Scope 3) carbon emissions by 35% by 2035 compared with 2021.

But what makes an energy company sustainable from a tax perspective?

Our tax contributions in a wide range of countries enable us to make indirectly by public authorities an essential contribution to funding projects that support the United Nations' 17 Sustainable Development Goals. For example, governments use these funds to reduce poverty domestically and to improve educational opportunities.

## Sustainable development goals



Uniper supports the 17 United Nations Sustainable Development Goals (SDGs).

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# Tax strategy and principles

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## Tax strategy and principles

Uniper is a responsible taxpayer that also fulfills its social responsibility regarding public financing. This is unambiguously reflected in our Code of Conduct as well.

Uniper is active in many countries in which it is subject to a variety of tax obligations and responsibilities. The principal tax jurisdictions in which Uniper operates include Germany, the United Kingdom, the Netherlands, Sweden, Hungary, and the United States.

Uniper pursues a consistent tax strategy group-wide. This enables us to meet the wide range of tax obligations we face and simultaneously achieve our business objectives. Our tax strategy clearly defines our tax functions, identifies and delegates specific tasks, and establishes the organizational setup for these tasks to be carried out efficiently and effectively.

The Uniper Group’s continually evolving structure and the complexity of these tasks make it essential for all Uniper units to work together closely. It is the only way for Uniper to achieve its tax objectives and to safeguard, coordinate, and promote its interests. The Uniper Group Tax Guidelines define the principles for how the different parts of the tax organization work together on tax matters.

They enable the Group’s tax organization to make best use of its available expertise and resources and to ensure its continual improvement in line with best practices.

Pursuant to the Uniper Group Tax Guidelines, the CFO delegates the responsibility for compliance with these guidelines to the Executive Vice President for Tax (EVP Tax). Senior Vice Presidents for Tax (SVPs Tax), who head the single Tax departments, report to the EVP Tax. The SVPs Tax ensure that Uniper’s Group-wide tax strategy is complied with and implemented in their respective areas of responsibility.

Taxation generally remains linked to how and in what country a company is incorporated. In addition, countries use their tax laws to compete with each other, and these laws and international framework conditions are usually extremely complicated. Moreover, most tax systems have a large number of inconsistencies and lack harmonization. The Group Tax function is responsible for Uniper’s tax position both financially and qualitatively. The objective is to always meet Uniper’s tax obligations punctually, appropriately, and completely, and under these conditions also doing the best-possible job of helping Uniper achieve its business objectives.

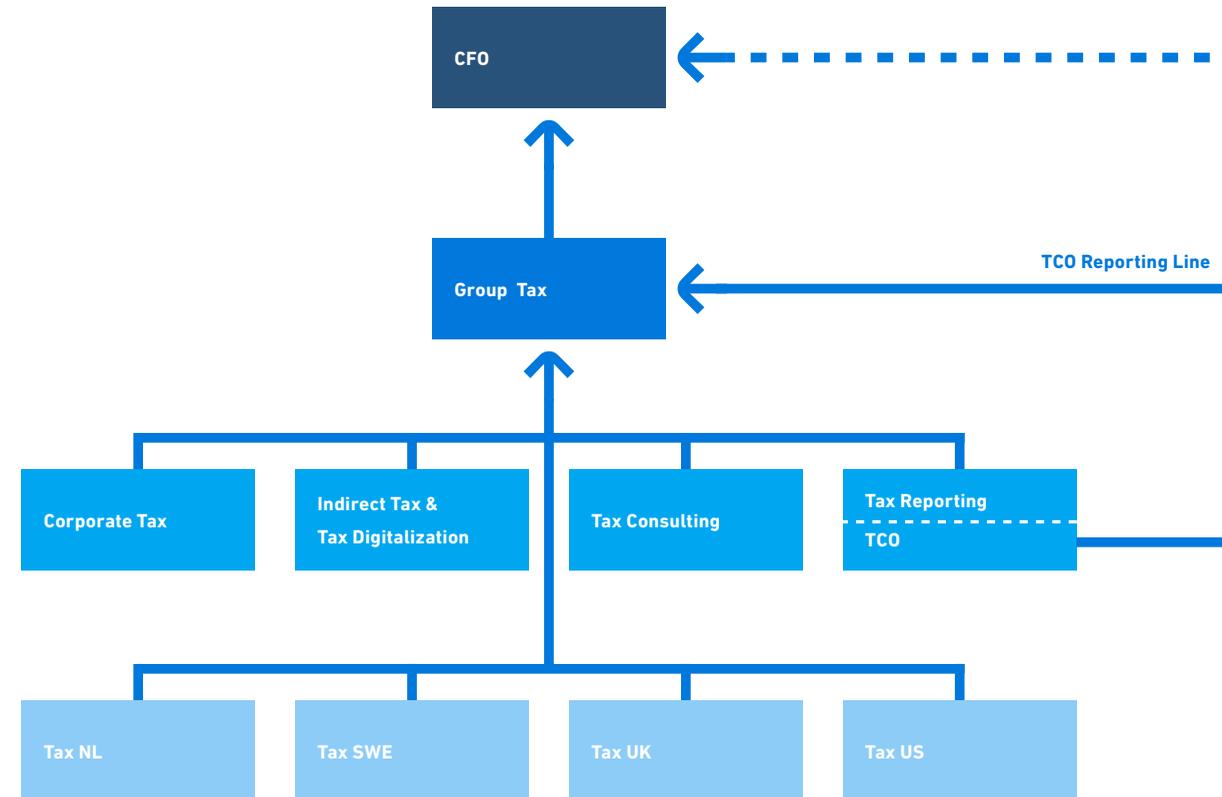
Uniper wants its business operations to help successfully tackle global challenges like energy access, climate protection, respect for human rights, innovativeness, and the provision of necessary infrastructure. Uniper’s commitment to addressing these issues is reflected in its corporate strategy and Code of Conduct (“Tone at/from the top”).

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# Tax strategy and principles

Our tax strategy has therefore defined the following objectives:

- **Integration:** Maintain a functionally oriented business organization to ensure that tax tasks are carried out efficiently.
- **Compliance/Control:** Group Tax centrally manages all tax functions in Germany and elsewhere along clear reporting lines that are entirely within the tax organization. This enables Uniper to fully meet high standards for tax compliance, including all tax obligations, and to avoid dependence on non-tax functions as well as conflicts of interest and loyalty.
- **Value contribution:** The Tax function adds value primarily by optimizing Uniper’s tax position and by efficiently planning in-house workflows and allocating resources.
- **Reputation:** The degree to which Uniper’s tax position can be optimized is strictly limited by its commitment to comply fully with all tax laws. The Tax team therefore must always safeguard Uniper’s decision-makers and prevent potential damage to the company’s reputation.



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# Tax governance, internal control system, and risk management

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# Tax governance, internal control system, and risk management

The tax strategy and principles described above are comprehensively integrated into the organization. They are firmly established in the Code of Conduct and in the internal guidelines and are being brought to life in practice throughout the organization.

The regular review and, if necessary, update of our tax strategy and its implementation are the responsibility of the EVP Tax, the SVPs Tax, and the Tax Compliance Management team.

In order to reinforce the Code of Conduct, web-based training sessions are conducted by the Uniper Compliance team on a regular basis. It is mandatory for all managers and employees to participate in these training sessions. In addition, some units and teams receive classroom training. The target group for these modules consists primarily of all employees with contact to customers, suppliers, or authorities. The training courses contain case studies which are used to study and illustrate compliant behavior. Participation in compliance training is documented.

At the end of each year, the members of the Uniper Management Board and the executives, i.e. also the managers in the Tax teams, confirm in writing that they themselves and their teams have acted in accordance with the Code of Conduct in their respective areas of responsibility.

In addition to the Code of Conduct and the policies, corresponding requirements and procedures for the internal control system (ICS) are defined in a consistent Group-wide framework. Uniper's ICS is based on the globally recognized COSO framework (COSO: The Committee of Sponsoring Organizations of the Treadway Commission) and pursues, among other things, compliance with applicable laws and regulations. The ICS requirements relate to basic and specific ICS requirements, standards for the implementation, documentation, and evaluation of internal controls, and the final sign-off process:

- The basic ICS requirements are an important component of Uniper's ICS. They define overarching ICS principles and are binding for all functions in the Uniper Group. The goal is to create a protected control environment for business processes and control activities at an operational pro-

cess level. These general standards, rules, and structures refer, inter alia, to obtaining the necessary alignment with the Tax function regarding, for example, decisions relevant to tax law.

- The specific ICS requirements define possible risks at process level in a central risk catalog, which reflects company- and industry-specific aspects. They therefore serve as a checklist and guide for setting up internal controls and documenting them in the various functions. The controls covering the risks of the risk catalog are documented in a central IT application.
- The internal sign-off process is, inter alia, based on an annual assessment of the processes including the controls by the functional manager. It includes a statement regarding the ICS's effectiveness. All Uniper Group functions are involved in this process prior to the Management Board confirming the effectiveness within the Uniper Group. The Audit and Risk Committee of Uniper SE's Supervisory Board is informed about the Uniper Group's ICS on a regular basis.

The Compliance function plays a central role in Uniper's risk management system, from which tax risk management is derived. Its main objectives are in line with the compliance guideline and are as follows:

- Define procedures and measures to detect and analyze potential deficiencies and peculiarities.
- Coordinate investigations, evaluations, and, remedial measures for compliance violations as appropriate in coordination with the Chief Compliance Officer.
- Integration into the existing whistleblowing process.
- Inform management and report to the Management Board or a committee of the Supervisory Board (for example, the Audit and Risk Committee) on compliance aspects.
- Monitor processes within the Tax function.

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## Tax governance, internal control system, and risk management

Uniper has in place an ICS and a tax compliance management system (Tax CMS). The purpose of these systems is, among other things, to ensure compliance with tax laws in the respective jurisdictions.

The Tax CMS is part of the CFO's remit. The status of Tax CMS activities is monitored by means of periodic reports. The EVP Tax is responsible for running and monitoring the Tax CMS.

The Tax CMS is based on generally accepted audit standards and is continually improved based on a company-specific risk assessment. As part of the Tax CMS, issues are documented according to topic and corresponding responsibilities are defined; the overall responsibility for the Tax CMS lies with the Tax Compliance Officer (TCO).

The TCO has a clearly defined and independent function. The TCO's tasks include ensuring an efficient Tax CMS. Essentially, this means reviewing tax guidelines and the measures and controls defined therein as well as identifying deficits and remedying them.

The TCO has unrestricted access to information regarding all relevant tax-related data. The TCO reports directly to the EVP Tax on a standardized basis and at regular intervals or ad hoc as required. Reporting is particularly necessary considering possible compliance violations.

Uniper's in-house Tax team in Germany is informed on a quarterly basis about current developments in the Tax CMS.

To achieve these objectives and general tax compliance, there are the following main principles based on the Uniper Group Tax Guidelines:

- Ensuring compliance with all tax obligations: timely and complete fulfillment of all tax duties.
- Establishing awareness of tax issues in the organization by providing clear information about tax obligations and their potential impact on the business.
- Supporting the business by proactively identifying, addressing, and resolving potential tax issues in close collaboration with all areas/functions and stakeholders involved.
- Acting proactively, consistently, and reliably in aligning and coordinating business needs with tax requirements.
- Using resources/costs in an efficient manner.

Uniper understands that non-compliance with legal and/or statutory provisions and Group policies is also an economic risk. The Management Board therefore encourages all employees and other stakeholders to point out possible violations of the Code of Conduct and other violations of laws or guidelines, in particular regarding corruption, money laundering, antitrust law, and capital market law (insider trading).

Uniper has set up a whistleblowing hotline for internal and external stakeholders. It is operated by an external law firm in order to maintain transparency and impartiality. Any tip received will be treated strictly confidential. Any employee who reports a violation of rules is offered special protection in accordance with the principles of the Code of Conduct and will not have to fear any disadvantages as a result of their report.

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The changes in recent weeks and months have been extraordinary and challenging. Fulfilling the related tasks with the required speed and precisely implementing the necessary measures requires stable processes, reliable IT, and, above all, a strong team.

**Dr. Jutta A. Dönges**  
Chief Financial Officer

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# Focus on: 19-16-19-7 Tax relief for end-consumers

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## Focus on:

# 19-16-19-7 Tax relief for end-consumers

The degree to which the Corona pandemic and the ongoing war in Ukraine have shaped the past three years in social and economic terms can hardly be fathomed. In this highly dynamic situation, German lawmakers passed a variety of relief packages for citizens and companies to mitigate the economic repercussions of these crises.

In the second half of 2020 the VAT was temporarily reduced from 19% to 16% and the lower VAT on certain goods and products from 7% to 5%.

In 2022 German lawmakers lowered the VAT on natural gas and district heating service from 19% to 7%. The reduced rate applies until March 31, 2024. Alongside this this rate reduction, in December 2022 the German Bundestag also passed December emergency aid, which relieved citizens and companies of their December 2022 payment for gas and heat service.

These measures, which were adopted at short notice, posed various challenges for companies in the energy industry. For example, only end-consumers were to benefit from the reduced VAT, whereas the VAT was to remain cost-neutral for companies. Furthermore, all questions and issues that arose had to be analyzed and clarified in a very short time in order for the tax-rate reductions to be correctly reflected in processes. The same applied to the implementation of December emergency aid.

The tax, accounting, and settlement teams of various Uniper companies first clarified a large number of substantive issues and identified the material tax consequences for the Uniper Group. They then jointly investigated which specific steps were necessary to implement the tax-rate reductions. This involved conducting comprehensive interviews with staff responsible for the processes. Corporate IT, the department responsible for implementation on the technical side, was consulted in particular.

The necessary process adjustments mainly involved entering previously nonexistent tax codes into our tax systems. The codes were needed to enable automated, rule-based accounting in conjunction with accurate tax reporting. Particularly in cases of accrual and deferral, service catalogs were defined for the first time. The catalogs made it possible to determine in which case constellations no tax codes had previously been required and had to be introduced for the first time.

The layout of our invoices had to be considerably adjusted to display several tax rates and December emergency aid. Doing this on such short notice was possible with the help of our IT department. The adjustments across the entire billing process were thoroughly tested within the required time. The aim was not to expose Uniper to the risk of charging too much or too little tax.

Uniper Tax continues to be available to support the departments involved in order to clarify any issues that may arise subsequently and to ensure that our invoices charge the correct tax. This also includes, in particular, support in responding as swiftly as possible to questions posed by our customers.

We are also in continual contact and exchange with other energy companies in order to promote a consistent industry-wide approach. New findings from our consultations with tax authorities are promptly communicated and implemented across the Group.

### Approach Uniper Tax



#### Tax law

- Evaluate the legislation, associated publications, and the industry's final assessment from a Tax function perspective
- Positioning in cases of doubt



#### Process identification

- Identify the departments to involve and the company processes to be adjusted



#### Process adjustment

- Assess technical requirements
- Make any necessary adjustments, test them, and implement them on the system side



#### Communications

- Communicate with the departments involved
- Provide subject-matter and technical support during and after the implementation phase

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## Update: Digitalization@Tax

Digitalization is a decisive factor for the competitiveness of Uniper's current and future operating activities and represents a cornerstone of the energy transition. In 2021 we therefore launched COO Digital Evolution (COODE), a three-year digital transformation program. COODE places Uniper employees at the center and aims to optimize today's operating processes and propel tomorrow's innovations by means of digital solutions and more consistent data use. The COODE program has already implemented more than 100 digital solutions, thereby contributing to supply security, greater efficiency, and flexibility.

The program's key tasks include the digitalization and optimization of the Tax function's processes as well. In 2022 this related to the improvement and expansion of existing systems and tools for determining tax-relevant data for the quarterly and annual financial statements, the annual report, and tax returns. We also introduced a tool for documenting and archiving emails for the first time and established a data platform that significantly simplifies the collection of tax data for country-specific reporting.

In 2020 the European Union introduced a new tax reporting system that requires reporting for certain transactions referred to as cross-border tax arrangements (DAC6 or MDR). Uniper met this requirement by developed and implementing an IT-based Group-wide reporting process. The design of this process has continued to prove its worth in practice in 2022. Our previous Tax Transparency Reports contain additional information and a detailed description of the key features of this process.

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# Stakeholder engagement and management of tax issues

# Stakeholder engagement and management of tax issues

Our principle of cooperative and constructive collaboration with tax authorities as well as the prompt and consistent implementation of new and amended tax requirements also results in the involvement of the tax authorities in our tax processes. This enables Uniper not only to obtain legal certainty regarding the proper tax assessment of relevant topics at an early stage, both in Germany and abroad, but also to take appropriate account of tax concerns of stakeholders in particular.

A key tax development in this area in Germany in 2022 was the adoption of the Act on the Transposition of the DAC7 EU Directive and the Modernization of Tax Procedure Law.<sup>1</sup> The law expands and specifies the taxpayer's duty to cooperate in tax audits and also stipulates the principles of alternative audit approaches.

By expanding the duty to cooperate and proposing possible audit simplifications, the new law aims to promote more collaboration between tax auditors and companies and, under the following conditions, to speed up tax audits:

Tax authorities can make a binding commitment to the taxpayer for a future tax audit to simplify the audit's methods and scope. This can be done, for example, by specifying the focal points of, or omitting some aspects from, the audit. The prerequisite for this is that the company has in place a tax compliance management system (Tax CMS) and that the tax authority has assessed and recognized the system's effectiveness in a previous audit.

A tax compliance management system is therefore generally effective if it ensures that:

- (1) the tax bases are correctly recorded and taken into account
- (2) the taxes due on them are paid in full and on time
- (3) ongoing coverage of tax litigation risks is provided.

The tax authorities' commitment is subject to the condition that the requirements for the tax compliance management system continue to be met in the subsequent period to be audited; if not, tax authorities may withdraw their commitment.

Tax authorities now have the opportunity to gather and evaluate their findings and experiences during a specified trial period and to communicate them internally until June 30, 2029. Our Tax CMS was certified as appropriate in 2019 and accordingly provides a good basis for an effectiveness review by tax authorities.

The aforementioned legislation better meets the desire of many taxpayers for the planning and implementation of tax audits to take into account a company's governance structures. It also reflects OECD recommendations and developments in other countries. The idea is to promote a collaborative, mutually trustful approach between tax authorities and taxpayers.

<sup>1</sup> See the Act on the Transposition of Council Directive (EU) 2021/514 of March 22, 2021 amending Directive 2011/16/EU on administrative cooperation in taxation and modernizing the law on tax procedure of December 20, 2022 (BGBl. I 2022, 2730).

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## Stakeholder engagement and management of tax issues

It is important to emphasize that this approach does not necessarily result in a concurring assessment and view on individual tax issues and questions of interpretation. Rather, the tax authority is given the opportunity to gain a deep insight into the setup and processes of a taxpayer's tax organization and control environment. This provides the tax authority with an impression of the degree of responsibility that a company assumes and the effort that it makes with regard to the fulfillment of its obligations under tax law.

This confidence-building measure is intended to lay the foundation for even more constructive cooperation. A more risk-oriented approach could lead to faster tax audits and thus also to faster legal certainty for both sides. The resulting reduction in administrative activities alone should add value on the government side as well as for our company without altering anticipated tax revenues or the tax audit per se.

Uniper supports the aforementioned amended legislation and the opportunity it creates for closer collaboration with tax authorities. The process management tool we introduced in 2021 already intensified our cooperation with tax authorities and optimized and made more transparent already coordinated workflows. The positive experiences we have had strengthen our resolve to work with tax authorities to develop a cooperative tax audit approach for the aforementioned trial period and to share the knowledge we gain.

Should the findings of the trial period lead to a permanent amendment of German law, however, a number of issues regarding the specific implementation of the cooperative audit approach still need to be clarified. These issues are addressed, among other places, in the comments of the eight main German trade associations on the draft legislation for the law.<sup>2</sup>

The eight main German trade associations include the Federation of German Industries (BDI). We support the BDI's work, including its statements in tax policy position papers and is also actively involved by participating in working groups and the Young Tax Talents program.

Overall, we welcome German lawmakers' initiative to promote cooperation between tax authorities and taxpayers. This creates a good basis for collaborating with tax authorities to modernize tax law and adapt it to the needs of an increasingly digitalized environment.

<sup>2</sup> See the statement on the draft legislation of the Act on the Transposition of Council Directive (EU) 2021/514 of March 22, 2021, amending Directive 2011/16/EU on administrative cooperation in taxation and modernizing tax procedural law (status: July 2, 2022; IV B 6 - S 1316/21/10019 :019, 2022/0696428) of July 29, 2022.

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- › Tax strategy and principles
- › Tax governance, internal control system, and risk management
- › Spotlight on:
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# Country-by-country reporting

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## Country-by-country reporting

Individual Uniper Group companies pursue different business activities and, pursuant to our internal reporting setup, are assigned to the following segments/business division.

### European Generation

The European Generation segment comprises the various power and heat generation facilities that the Uniper Group operates in Europe. In addition to fossil-fuel power plants (coal-, gas-, oil- fired power plants; combined gas and steam power plants) and hydroelectric power plants, these generation facilities also include nuclear power plants in Sweden. Most of the energy produced is sold to the Global Commodities segment, which is responsible for the marketing and sale of the energy to major customers via the trade markets and its own sales organization. A further portion of the energy generated is marketed by means of long-term electricity and heat supply contracts. In addition to the power plant business, this segment also includes the marketing of energy services, which encompass engineering and asset management as well as operational and maintenance services.

### Global Commodities

The Global Commodities segment bundles the energy trading activities and forms the commercial interface between the Uniper Group and the global trade markets for energy and the major customers. Within this segment, the fuels required for power generation (mainly coal and gas) are procured, emission allowances are traded, the electricity produced is marketed, and the portfolio is optimized by managing the use of the power plants. On the basis of long-term contracts with suppliers within and outside Germany, Uniper sells natural gas to resellers (e.g., municipal utilities), major industrial customers, and power plant operators. This segment additionally includes infrastructure investments and gas storage operations.

### Russian Power Generation (Discontinued Operations)

PAO Unipro, a company listed in Russia, is responsible for conducting all business in connection with power generation and associated activities in Russia. These include the procurement of the fuels needed for the power plants, the operation and management of the plants and the trading and sale of the energy produced. The Russian Power Generation business division, which is classified as a discontinued operation and consists of the majority interest in PAO Unipro, was deconsolidated as of December 31, 2022, owing to Uniper’s loss of decision-making rights and inability to direct activities. Consequently, the following section does not present or take into account tax information relating to Russia.

### Administration/Consolidation

The non-operating functions that are performed centrally across segments of the Uniper Group are combined under Administration/Consolidation, which also includes the consolidations required to be carried out at the Group level.

The key tax figures resulting from these business activities for 2022 are summarized in the following section and presented in tabular form for each country.

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# Country-by-country reporting

## Overview of Countries 2022

in M€	Germany	Sweden	Great Britain	The Netherlands	USA	Hungary	Other	Total
Profit before corporate income taxes	-15,413	-1,300	2,515	887	33	184	85	-13,010
Stated capital	67,556	1,051	2,377	944	145	139	373	72,584
Accumulated earnings	-726	-2,199	3,006	29	103	-90	-104	19
Assets used in operations	3,485	5,044	1,598	1,076	1	225	20	11,449
Interest-bearing loan receivables	9,512	506	592	24	271	32	417	11,353
Number of employees	4,721	905	932	310	75	36	71	7,050
<b>Total tax contribution</b>	<b>1,181</b>	<b>-38</b>	<b>317</b>	<b>169</b>	<b>15</b>	<b>-101</b>	<b>14</b>	<b>1,558</b>
<b>Total tax rate</b>	<b>0%</b>	<b>-3%</b>	<b>12%</b>	<b>2%</b>	<b>9%</b>	<b>21%</b>	<b>3%</b>	<b>-3%</b>
<b>Taxes Borne</b>								
Corporate income taxes	-147	0	113	0	1	38	2	8
Production taxes	2	2	200	10	0	1	0	215
Employment taxes	66	21	12	8	1	0	0	109
Taxes on property	-1	10	14	3	1	0	0	27
Other taxes borne	4	0	2	1	0	0	0	7
<b>Total taxes borne</b>	<b>-75</b>	<b>33</b>	<b>341</b>	<b>22</b>	<b>3</b>	<b>40</b>	<b>2</b>	<b>366</b>
<b>Taxes collect</b>								
Net VAT	799	-90	-56	122	0	-145	11	640
<i>Sales VAT</i>	28,499	164	3,281	1,370	0	904	25	34,243
<i>VAT on purchases</i>	-27,701	-253	-3,337	-1,248	0	-1,050	-15	-33,603
Payroll taxes	237	19	29	16	6	0	1	308
Excise taxes	221	0	3	10	6	4	0	244
Other taxes collected	0	0	0	0	0	0	0	0
<b>Total taxes collected</b>	<b>1,256</b>	<b>-70</b>	<b>-24</b>	<b>148</b>	<b>12</b>	<b>-141</b>	<b>12</b>	<b>1,192</b>

\* Total tax rate not meaningful in all countries due to current earnings situation.

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The following so-called low-tax jurisdictions are also included in the Other section of the above table.

### Malta

Uniper is the sole shareholder of an insurance company and a holding company in Malta, which are domiciled there for reasons relating to insurance. Both companies are subject to local taxation in Malta.

### United Arab Emirates (UAE)

Uniper is the sole shareholder of three companies in the United Arab Emirates (UAE) whose purposes are oil processing, trading activities, and services. All of these companies are operational, and they own local assets and have employees. Uniper’s income in the UAE in 2022 is not subject to income tax because the UAE does not have such as tax system.

Uniper has entered into an agreement to sell 100% of the shares in its crude oil processing and marine fuel trading business (Uniper Energy DMCC). The sale, which is expected to close in the months ahead, is subject to certain conditions being met.

<sup>3</sup>The overview contains only fully consolidated companies and their foreign taxable permanent establishments (if material). The Notes to the Uniper Annual Report 2022 provides more information on shareholdings and their domiciles.

The following overview<sup>3</sup> shows which Uniper units are active in which countries and in which segments.

Land	European Generation	Global Commodities	Admin
Germany	Rhein-Main-Donau GmbH	Uniper Global Commodities SE	Uniper SE
	Donau-Wasserkraft Aktiengesellschaft	METHA-Methanhandel GmbH	Uniper Beteiligungs GmbH
	Uniper Kraftwerke GmbH	Kokereigasnetz Ruhr GmbH	Uniper Holding GmbH
	BauMineral GmbH	Lubmin-Brandov Gastransport GmbH	Uniper Financial Services GmbH
	Uniper Systemstabilität GmbH	Uniper Energy Storage GmbH	Uniper IT GmbH
	RuhrEnergie GmbH, EVR	Uniper Energy Sales GmbH	Uniper HR Services Hannover GmbH
	Uniper Anlagenservice GmbH	Uniper Ruhrgas International GmbH	Uniper Risk Consulting GmbH
	Gemeinschaftskraftwerk Irsching GmbH	Uniper Hydrogen GmbH	Uniper International Holding GmbH
	Uniper Wärme GmbH	Liqvis GmbH	
	Uniper Technologies GmbH	DFTG-Deutsche Flüssigerdgas Terminal Gesellschaft mit beschränkter Haftung	
Sweden	Uniper Renewables GmbH		
	Sydkraft Thermal Power AB	NA	Sydkraft AB
	Sydkraft Hydropower AB		Sydkraft Försäkring AB
	Kolbäckens Kraft KB		
	Sydkraft Nuclear Power AB		
Great Britain	OKG AB		
	Uniper UK Limited	Holford Gas Storage Limited	NA
	Uniper UK Gas Limited	Uniper Energy Trading UK Staff Company Limited	
	Uniper UK Corby Limited	Uniper Global Commodities London Ltd.	
	Uniper UK Ironbridge Limited	Uniper Global Commodities UK Limited	
The Netherlands	Uniper Technologies Limited	Uniper Hydrogen UK Limited	
	Uniper Benelux Holding B.V.	Uniper Infrastructure Asset Management B.V.	NA
	Utilities Center Maasvlakte Leftbank B.V.	Uniper Ruhrgas BBL B.V.	
	Uniper Benelux N.V.	Uniper Gas Transportation and Finance B.V.	
USA		Uniper Hydrogen Netherlands B.V.	
	NA	Uniper Global Commodities North America LLC	NA
Hungary	Uniper Hungary Energetikai Kft.	NA	NA
Canada	NA	Uniper Trading Canada Ltd.	NA
Malta	NA	NA	Ergon Insurance Ltd Ergon Holdings Ltd
	NA	Uniper Energy DMCC	NA
UAE	NA	Uniper Energy DMCC	NA

## List of Abbreviations, Glossary, and Additional Information

<b>BDI</b>	Federation of German Industries
<b>CFO</b>	Chief Financial Officer
<b>COSO</b>	Committee of Sponsoring Organizations of the Treadway Commission; see: <a href="http://coso.org">coso.org</a>
<b>DAC6 and/or DAC7</b>	Council Directive (EU) on Administrative Cooperation 6 and/or 7 and Amendment of the EU Mutual Assistance Directive
<b>EVP Tax</b>	Executive Vice President for Tax
<b>GRI</b>	Global Reporting Initiative; "About this report" below provides more information
<b>ICS</b>	Internal Control System
<b>MDR</b>	Mandatory Disclosure Regime of the OECD; see: Description to DAC6
<b>SDGs</b>	United Nations' Sustainable Development Goals
<b>SVPs Tax</b>	Senior Vice President(s) for Tax
<b>Tax CMS</b>	Tax Compliance Management System
<b>TCO</b>	Tax Compliance Officer

# List of Abbreviations, Glossary, and Additional Information

<b>Employer contributions</b>	Employer contributions, particularly to social insurance
<b>Employee contributions</b>	Employee contributions, particularly to social insurance
<b>Digitalization@Tax</b>	Program to digitalize Uniper's Tax function
<b>Corporate income taxes</b>	Current taxes on income and earnings
<b>Overall tax rate</b>	Total tax burden relative to earnings before taxes
<b>Number of employees</b>	Number of Uniper Group employees (deviations to Uniper's Annual Report are possible due to the allocation to operations outside Germany)
<b>Low-tax countries</b>	Countries whose income tax rate is below 10%
<b>Operating assets</b>	Property, plant, and equipment as well as assets in conjunction with Sweden's nuclear waste fund
<b>Production taxes</b>	Taxes resulting from production processes
<b>Other property taxes</b>	Taxes resulting from property
<b>Social security contributions</b>	Employer and employee social security contributions
<b>Tax codes</b>	Part of the master data in IT systems for the correct taxation of transactions
<b>Uniper Group Tax Guidelines</b>	Uniper Group tax guidelines and regulations
<b>Consumption taxes</b>	Essentially electricity and energy taxes
<b>Whistleblowing process</b>	Process for reporting possible compliance violations

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## Historie Fokusthema

<b>2021 Uniper Tax Transparency Report</b>	Digitalization@Tax
<b>2020 Uniper Tax Transparency Report</b>	DAC6

## About this report

Like our overarching sustainability reporting, this report is based on the current standards of the Global Reporting Initiative (GRI), in particular the module GRI 207: Taxes. GRI is a private-sector organization that publishes standards for the preparation of sustainability reports. For more information, visit: [globalreporting.org](https://globalreporting.org)

**Disclaimer**

This document may contain forward-looking statements based on current assumptions and forecasts made by Uniper SE management and other information currently available to Uniper. Various known and unknown risks, uncertainties, and other factors could lead to material differences between the actual future results, financial situation, development, or performance of the company and the estimates given here. Uniper SE does not intend, and does not assume any liability whatsoever, to update these forward-looking statements or to adapt them to future events or developments.

