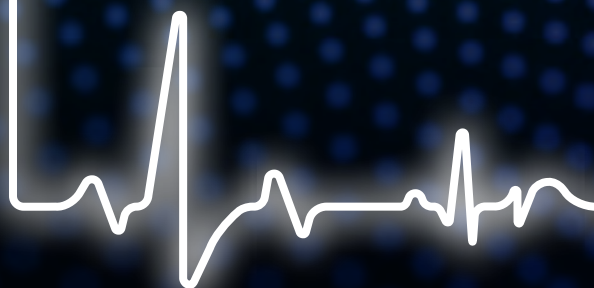




Tax Transparency Report 2024



The beating heart of energy.

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Uniper's approach to tax transparency

Uniper's tax contribution

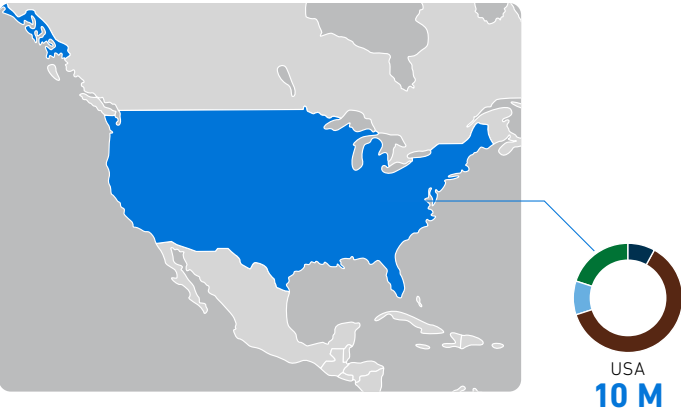
Foreword

Uniper: we accelerate the energy transition

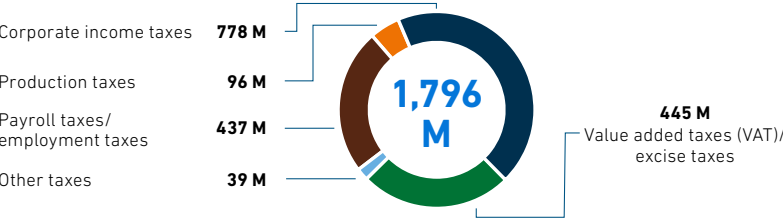
Sustainability at Uniper

Uniper's tax contribution

Tax contribution by country (€)

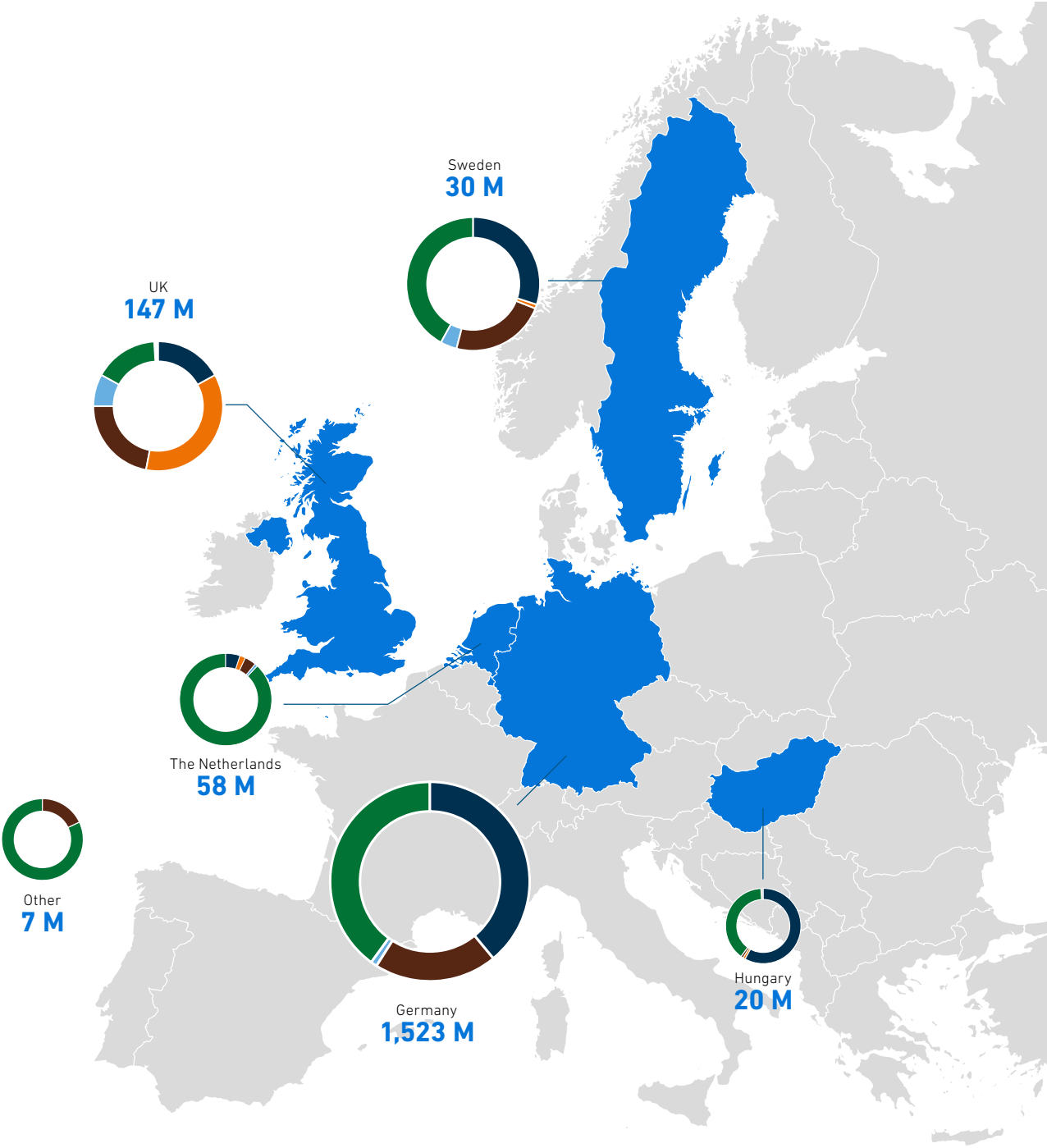


Total tax contribution



Notes:

- Rounding may result in minor deviations from the totals (see the "Country-by-country reporting" chapter).
- After the loss of control and the associated deconsolidation as of December 31, 2022, the equity interest in PAO Unipro continues to be presented as an "other" equity investment. Given the high degree of uncertainty regarding a sales price that can actually be achieved and enforced, it is measured at a carrying amount of €1. (see Uniper Annual Report 2024). Russia placed PAO Unipro under state administration in late April 2023. Consequently, we have no tax information on the company.





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Our company's transformation and growth are helping establish a solid foundation for a secure and sustainable energy supply.

Jutta Dönges, Uniper CFO

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Foreword

Uniper is a responsible energy company and therefore places great emphasis on transparency and sustainability in all parts of its business. This includes presenting our tax policies and practices openly and comprehensively. This report aims to give you insights into our tax principles and work methods as well as information about our tax contribution.

A second very successful year in a row enabled us to pay to the German government a total of around €2.6 billion of the stabilization support granted to Uniper, thus benefiting taxpayers. Uniper’s successful performance is also reflected by our tax contribution of €1.8 billion in 2024.

We have already fulfilled many of the stabilization package’s remedies of the European Commission and will continue to systematically implement those remaining within the required time frame. We are making good progress.

Overall, we have fully achieved our objectives and can now focus on the future. Systematically implementing our new strategy — even amid a demanding market environment — will enable us to build a resilient foundation for the challenges

Our corporate culture, which promotes innovation and lifelong learning, is the key to motivated and highly qualified employees and a prerequisite for our business success.

ahead. Because one thing is clear: the energy policy and geo-political environment has not become any easier, and the pace of change in recent weeks has been unprecedented.

Similarly, changes in tax policy have been announced and are to be expected. Examples include current discussions on global minimum taxation (which we presented in last year’s report) and possible tax legislation by the new German government. Countries’ tax sovereignty is central to their financing of public tasks and ensures their financial autonomy. In addition, tax systems can be designed to create incentives to promote desired economic behavior, such as investment or consumption. Conversely, tax disadvantages can help reduce undesirable behavior. Taxation’s ability to induce behavior can, when compared internationally, lead to tax competition between countries. However, international tax competition contrasts with the current global trend toward greater tax transparency and tax fairness.

Two issues in particular exemplify this trend in the EU:

One is public Country-by-country reporting (pCbCR). The other is the tax defense measures adopted by the EU against non-cooperative countries and territories.

As its name suggests, pCbCR regulates how tax-relevant information will be published in accordance with a standard that is now valid in the EU.

EU-wide defensive measures, on the other hand, are aimed at business relationships with companies domiciled in countries that do not meet minimum tax standards. Their purpose is to ensure greater tax fairness. The “Spotlight on” section of this year’s report will describe these regulations, how they work, and what new tax obligations they impose based on their implementation in Germany.

Uniper is an international energy company with activities in more than 40 countries. Having in place a functioning tax compliance management system that encompasses all necessary technologies is essential for ensuring that we meet our tax obligations — such as those arising from Germany’s Tax Haven Defense Act — in all countries punctually and comprehensively. In recent years, we have used tax projects and topics to illustrate the importance of automation and digitalization at Uniper.

In addition, our organization’s increasing use of artificial intelligence (AI) offers a wide range of benefits. AI enables us to:

- automate routine tasks,
- analyze large amounts of data,
- track and analyze complex tax regulations and changes,
- ensure that tax obligations are fulfilled correctly,
- detect risks and irregularities early.

Overall, AI therefore helps enhance our tax compliance.

Another decisive advantage is the efficiency that can be achieved through the use of AI, which frees up employees to focus on more strategically important tasks and use their expertise to add value.

The introduction of AI in our tax organization also has a considerable impact on our employees’ professional development. It gives them the opportunity to expand their skills in new, challenging areas. This not only promotes job satisfaction, but also helps retain talented specialists and junior staff for the long term.

Ongoing training in digitalization and AI is therefore indispensable for ensuring that all employees are or become familiar with the latest technologies and methods. Our corporate culture, which promotes innovation and lifelong learning, is the key to motivated and highly qualified employees and a prerequisite for our business success.

We are at the beginning of an exciting journey. We invite you to come along.



Jutta Dönges, Uniper CFO

Uniper. Accelerating the energy transition: flexible, balanced, bespoke

Düsseldorf-based Uniper is a European energy company with global reach and activities in more than 40 countries. With around 7,500 employees, we make an important contribution to security of supply in Europe, particularly in our core markets of Germany, the UK, Sweden, and the Netherlands. Our operations include 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 a total capacity of more than 7 billion cubic meters.

Uniper aims to become carbon-neutral. To achieve this, we are transforming our power plants and facilities and investing in flexible, dispatchable power generation units. We are one of Europe’s largest operators of hydropower plants and are helping further expand solar and wind power, which are essential for a more sustainable and secure future. Uniper is gradually adding renewable and low-carbon gases such as biomethane to its gas portfolio and is developing a hydrogen portfolio with the aim of a long-term transition. We plan to offset any remaining CO₂ emissions by high-quality CO₂-offsets.

Uniper is a reliable partner for communities, municipal utilities, and industrial enterprises for planning and implementing innovative, lower-carbon solutions on their decarbonization journey. As a hydrogen pioneer, we are active worldwide along the entire hydrogen value chain, and are conducting projects to make hydrogen a mainstay of the energy supply.



Sustainability at Uniper: Our responsibility toward society

Climate change remains one of today’s biggest global challenges. Addressing it will require efforts to significantly reduce greenhouse gas emissions. Being an energy company enables Uniper to play an important role in helping achieve the European Union’s climate targets. These targets call for greenhouse-gas emissions to be reduced by at least 55% by 2030 compared with a 1990 baseline and for climate neutrality to be achieved by 2050. In addition, Germany aims to be climate-neutral by 2045.

Uniper will continue to focus on transforming itself into a more climate friendly power and gas company. Due to an increasingly challenging market environment and delays in regulatory changes (particularly for hydrogen), in 2024 Uniper moved its carbon-neutrality target for Scope 1 and 2 emissions back by five years, from 2035 to 2040, and synchronized this target with its target for Scope 3 emissions. Uniper likewise stands by its target of reducing Scope 1 and Scope 2 emissions by more than 55% by 2030 relative to a 2019 baseline. We intend to reduce our Scope 3 emissions by 25% by 2030 and by 35% by 2035 compared with a 2021 baseline.

Furthermore, Uniper will end commercial coal-fired power generation by 2029, which is more than eight years earlier than its original assumption that it would exit by 2038*. In addition, Uniper plans to gradually decarbonize its gas-fired power plants.

In 2023 Uniper communicated its new strategy to transform the company over the long term. In 2024 we focused primarily on implementing this strategy in an increasingly challenging environment.

By implementing its strategy Uniper will remain a strong integrated power and gas supply company with a strong focus on its core markets of Germany, the United Kingdom, the Netherlands, and Sweden. Our approximately 1,000 customers — which include municipal utilities, industrial companies, and grid operators — are at the center of our business activities. Uniper offers its customers integrated solutions consisting of green and flexible power and gas products that are flexible, balanced, and bespoke to help customers achieve their decarbonization targets. Uniper intends to make a further decisive contribution to the energy transition’s success by increasing the use of its dispatchable gas-fired power plants. These flexible gas-fired power plants are necessary to balance out the increasing volatility of wind and solar output and thus to ensure the stability of power grids and the power supply. These power plants will help achieve the European Union’s net-zero target under the European Green Deal.

Our corporate strategy includes placing an important focus on investing in renewables and, in particular, on expanding our wind and solar capacity. Uniper plans to invest about €8 billion until the early 2030s to transform the company.

What makes an energy company sustainable from a tax perspective as well?

Our tax contributions in a wide range of countries enable us to make an essential, indirect contribution to government funding of projects that support the United Nations’ 17 Sustainable Development Goals (SDGs). For example, countries use these funds to reduce poverty domestically, improve educational opportunities, and give people access to cleaner, more affordable energy.

Sustainable Development Goals

The United Nations’ 17 SDGs are an urgent call to action for all countries. For people, they aim to end poverty, improve health and education, and reduce inequality. For the environment, they aim to combat climate change and preserve oceans and forests. We recognize the importance of all 17 SDGs and fully support them.



*This is subject to the proviso that Datteln 4 hard-coal-fired power plant is sold in accordance with the EU’s state aid decision.

Tax strategy and principles

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. Our principal tax jurisdictions include, in particular, 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 Tax teams in Germany and other countries, 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.

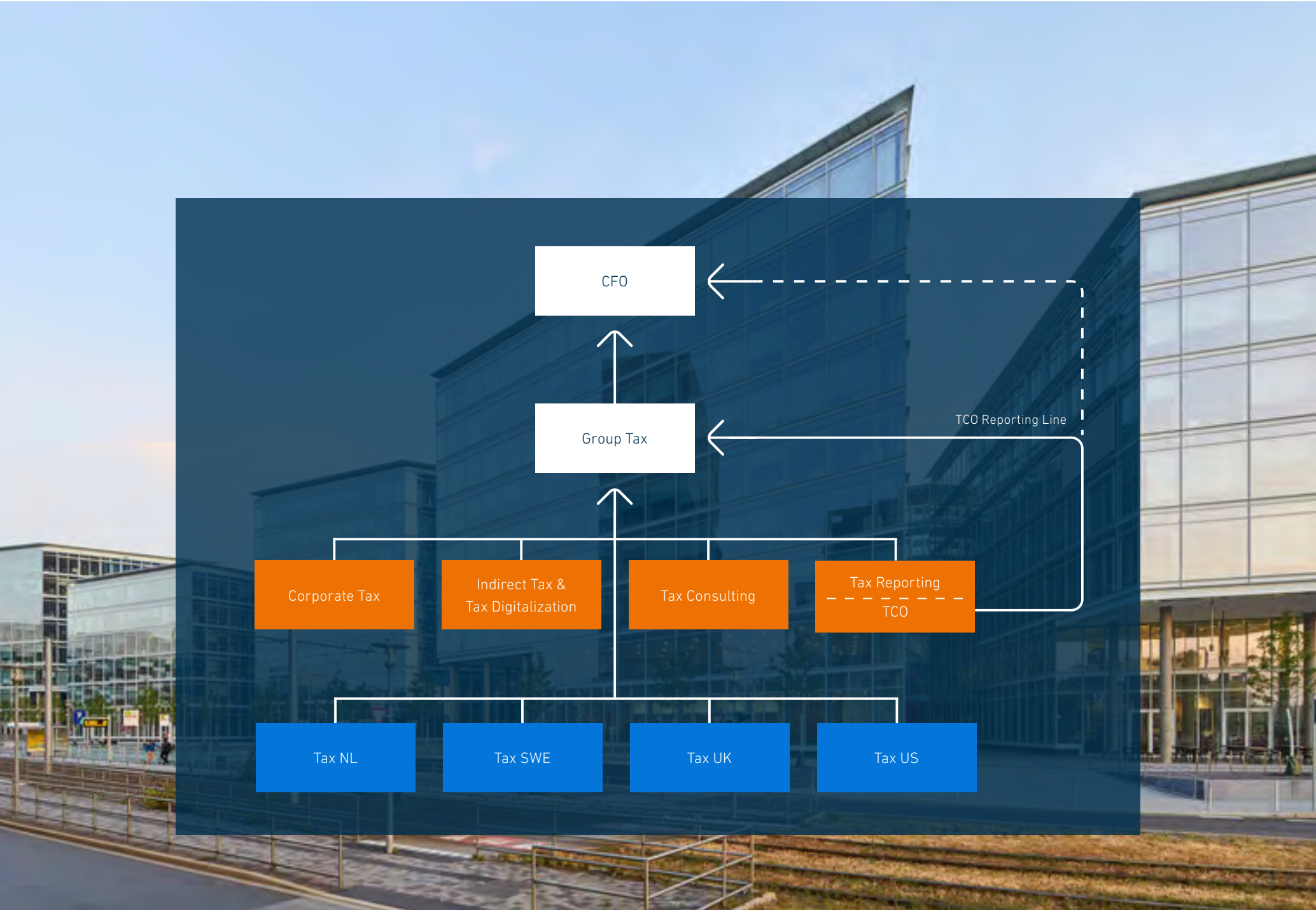
Taxation remains linked to how and in what country a company is incorporated. In addition, countries use their tax laws to compete with each other, and these laws and international framework conditions are usually extremely complicated. Moreover, most tax systems have a large number of inconsistencies and lack harmonization. Group Tax 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, while 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”).

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**
all tax departments in Germany and elsewhere are integrated by means of a functional reporting line and coordinated centrally by Group Tax. 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 of course 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.



Tax governance, internal control system, and risk management

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 employees with contact to customers, suppliers, or authorities. The training courses mainly contain case studies which are used to study and illustrate compliant behavior. Participation in compliance training is documented.

At the end of each year, Uniper SE Management Board members and executives — including Tax executives — 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 general and specific ICS requirements, standards for the implementation, documentation, and evaluation of internal controls, and the final sign-off process:

- The general 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 process level. These general standards, rules, and structures refer, among other things, to obtaining the necessary clearance from the tax function regarding, for example, decisions relevant to tax law.
- The specific ICS requirements define possible risks at the 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, among other things, 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 ICS's 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.



"Introducing the MS Copilot company-wide has enabled Uniper to lay the foundation for AI use and for a technical transformation whose potential we are leveraging."

Jutta Dönges, Uniper CFO

The Compliance function plays a central role at Uniper. The main objectives of tax risk management, which accord with compliance guideline, are to:

- Define procedures and measures to detect and analyze potential deficiencies and peculiarities.
- Coordinate investigations, evaluations, and, as appropriate, remedial measures for compliance violations in coordination with the Chief Compliance Officer.
- Integrate tax issues 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.

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 in accordance with IDW PS 980 and is continually improved based on a company-specific risk assessment. The Tax CMS involves documenting issues by topic and defining corresponding responsibilities; the overall responsibility for the Tax CMS lies with the Tax Compliance Officer (TCO).

The TCO has a specific, independent function. The TCO's tasks include ensuring an efficient Tax CMS. Essentially, this means reviewing tax guidelines — in particular and the measures and controls they define — 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.

We adopt the following main principles, which are based on the Uniper Group Tax Guidelines, to achieve these objectives and general tax compliance:

- Ensure compliance with all tax obligations: timely and complete fulfillment of all tax duties.
- Establish awareness of tax issues in the organization by providing clear information about tax obligations and their potential impact on the business.
- Support the business by proactively identifying, addressing, and resolving potential tax issues in close collaboration with all areas/functions and stakeholders involved.
- Act proactively, consistently, and reliably in aligning and coordinating business needs with tax requirements.
- Use resources/costs efficiently.

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 as strictly confidential. Any employee who reports a violation of rules is offered special protection in accordance with the Code of Conduct's principles and do not have to fear any disadvantages as a result of their report.

Germany's Tax Haven Defense Act

Germany's Tax Haven Defense Act

Germany adopted the Tax Haven Defense Act (the Act) on July 1, 2021. Its provisions was applied in stages, the first on January 1, 2022, the last on January 1, 2025 for the first time. Uniper has continually adjusted and expanded its existing processes in order to comply with all provisions at all stages.

The Act's purpose is to promote international tax justice and to encourage non-cooperative tax jurisdictions to adopt international tax standards and prevent tax avoidance. To this end, the Act imposes additional compliance and re-reporting obligations on Germany-based taxpayers that have business relationships with non-cooperative tax jurisdictions and sanctions these business relationships with tax disadvantages.

The EU periodically publishes a list of countries it deems to be non-cooperative.

The EU blacklist is a list of tax jurisdictions that do not cooperate with the EU states in tax matters. The EU blacklist is supplemented by a list of countries and territories that do not yet meet all international tax standards but have promised to implement reforms (EU grey list). Both the EU blacklist and the EU grey list are reviewed twice a year by the Economic and Financial Affairs Council (ECOFIN Council), updated if necessary, and generally transposed into EU countries' national law.

The following tax jurisdictions are on the EU blacklist and EU grey list effective December 31, 2024:

Blacklist

- American Samoa
- Anguilla
- Fiji
- Guam
- Palau
- Panama
- Russia
- Samoa
- Trinidad and Tobago
- American Virgin Islands
- Vanuatu

Greylist

- Antigua and Barbuda
- Belize
- British Virgin Islands
- Costa Rica
- Curaçao
- Eswatini
- Seychelles
- Turkey
- Vietnam



The Act has various provisions for imposing taxing sanctions on business relationships with non-cooperative tax jurisdictions and for encouraging such tax jurisdictions to cooperate. For example, the deduction of business expenses may be denied or payments to non-cooperative tax jurisdictions may be subject to additional withholding tax. In addition, tax disadvantages can arise from add-back taxation (income taxed at a low rate abroad is taxed additionally in Germany) as well as from a possible tax liability on profit distributions and the sale of equity interests.

The provisions for withholding taxes apply to payments to non-cooperative tax jurisdictions. The provisions for stricter add-back taxation and those for profit distributions and the sale of equity interests apply to investments in companies in non-cooperative tax jurisdictions. The prohibition on the deduction of business expenses and income-related expenses generally applies to all cases, but is subordinate to the stricter rules on add-back taxation and withholding tax provisions.

The application of one of the aforementioned provisions results in taxpayers facing additional increased cooperation obligations. These include the obligation to explain the business relationship, to provide copies of contracts, and to describe the business strategy being pursued as well as the respective market and competitive conditions. This information must be made available to tax authorities within one year after the close of the financial year.

The Act may become relevant for the Uniper Group in particular if tax jurisdictions relating to international maritime transport are included on the EU blacklist. Uniper's global trading in (energy) commodities and the associated maritime transport requires it to keep such business relationships under particular scrutiny.

A key step we took was to expand our internal controls in order to integrate the ban on the deduction of operating expenses, which applies for the first time effective January 1, 2025, into our tax compliance process, which has been in place since 2021. The internal controls continued serve to ensure the timely identification of relevant business relationships. The Uniper Group's operating units are closely involved in these controls. These operating functions are responsible for notifying Group Tax punctually of any and all business relationships within the meaning of the Act. Group Tax, in turn, is primarily responsible for fully reviewing and reporting all relevant business transactions and reporting them to tax authorities.

The aforementioned process, which is an integral part of the Uniper Group's Tax CMS, has the following main aspects:

- The Act's provisions are extensive and complex. The aforementioned expansion of our tax processes and controls included documenting our understanding of the Act in general and our interpretation of legal terms in particular. The purpose is to ensure uniform application of the Act's provisions throughout the Uniper Group.

- Group Tax carefully analyzes and processes notifications from the operating units. It is essential for Group Tax to have all necessary information at an early stage. Group Tax uses this information to review and document the business relationships and, if they meet Act's criteria, to disclose them to tax authorities.

- If Group Tax identifies a transaction as a business relationship within the meaning of the Act, it conducts a detailed tax audit in compliance with legally mandated documentation obligations. This audit is based in part on questionnaires that are used to record and evaluate the relevant transactions. The specified steps of the process aim in particular to ensure that defined controls are carried out and documented.

The entire process is subject to periodic review. Adjustments can be made promptly in response to legal or actual changes. The publication of the list of non-cooperative countries each February and October is another important reason for ongoing review. In addition, we draw on the experience of all Uniper units and functions involved to continually optimize individual steps of the process.



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 stakeholders' tax concerns in particular.

The Act on the Transposition of the DAC7 EU Directive and the Modernization of Tax Procedure Law, which Germany adopted in 2022, remains very significant* After all, 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 law aims to promote more collaboration between tax auditors and companies and, under the following conditions, to speed up tax audits.

*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).

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 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.

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 for taxpayers as well as for our company without altering anticipated tax revenues or the tax audit itself.

Uniper generally supports the aforementioned opportunities for closer collaboration with tax authorities. The process management tool we introduced several years ago already intensified our cooperation with tax authorities and optimized and made more transparent already coordinated workflows. Our positive experiences continue to strengthen our resolve to work with tax authorities to develop a cooperative tax audit approach and to share the knowledge we gain.

Fostering cooperation between tax authorities and taxpayers creates a good basis for collaborating with tax authorities to modernize the tax law framework and adapt it to the needs of an increasingly digitalized environment.

We support the work done by the Federation of German Industries (BDI) and the German Association of Energy and Water Industries (BDEW), including by offering our viewpoint on tax policy position papers and participating in selected working groups.

Country-by-country reporting

Country-by-country reporting

Individual Uniper Group companies pursue different business activities. Since the 2024 fiscal year, the Uniper Group has been organized into the following three operating segments to reflect the Group's strategic realignment and management: Green Generation, Flexible Generation (both previously: European Generation), and Greener Commodities (previously: Global Commodities). Administration/Consolidation is a non-operating business segment.

Green Generation



The Green Generation segment comprises low carbon power generation plants that the Uniper Group operates in Europe.

In addition to hydroelectric power plants (both run-of-river power plants and pumped storage plants), these generation plants also include nuclear power plants in Sweden, as well as wind and solar power plants. Renewable energies will play a crucial role in climate-neutral power generation in the future. To this end, Uniper is investing in the development, construction and operation of wind and solar power plants. Most of the energy generated in the Green Generation segment is sold to the Greener Commodities segment, which is responsible for the marketing and sale of energy to major customers via the traded markets and its own sales organization. Some of the energy generated is also sold directly to customers via long-term electricity supply contracts.

Flexible Generation



The Flexible Generation segment comprises the power and heat generation plants that the Uniper Group operates in Europe in order to flexibly meet the requirements of grid operators to ensure grid stability and security of supply if low carbon generation plants do not have sufficient capacity.

Gas-fired power plants, combined-cycle gas turbine power plants and, if necessary, coal- and oil-fired power plants make an important contribution to security of supply in Uniper's core markets. In addition to their commercial operation, these power plants also perform this function under various regulatory frameworks, including via the German Grid Reserve Ordinance, as special grid-stabilization assets or in the context of Capacity Market auctions in the UK. Both existing gas-fired power plants and combined-cycle gas turbine power plants that will remain in the portfolio for the long term and new builds will also increasingly be able to use hydrogen as an alternative fuel. Most of the energy generated is sold to the Greener Commodities segment. Some of the energy generated is also sold directly to customers via long-term electricity and heat supply contracts. The use of battery storage solutions will be further expanded in this segment in the future. In addition to the power plant business, this segment also includes the provision of energy services.

Greener Commodities



The Greener Commodities segment bundles the energy trading and optimization activities and forms the commercial interface between the Uniper Group and the global traded markets for energy and the major customers.

Uniper manages a gas portfolio that is optimized and sells natural gas to distributors (e.g., municipal utilities), large industrial customers and power plant operators, or in international energy markets, on the basis of long-term supply contracts with domestic and foreign suppliers, as well as through LNG imports and short-term gas-market purchases.

In addition, this segment includes gas storage operations as a key business line, as well as a number of other infrastructure investments in areas such as LNG. In the future, the Greener Commodities segment will also increasingly import, trade and in some cases even process or store in its own plants green molecules such as hydrogen, biomethane and ammonia. This segment is responsible for procuring the fuels required for conventional power generation, trading emission allowances, marketing the electricity generated and optimizing the entire energy portfolio by managing the use of power plants. Moreover, Uniper is also developing a portfolio of solar and wind power purchase agreements and trading in green certificates for the supply of green energy.

Administration/Consolidation

Administration/Consolidation bundles the non-operating functions that are performed centrally across segments, as well as the consolidations required to be carried out at Group level.

The key tax figures resulting from the aforementioned business activities for 2024 are summarized in tabular form for each country as follows.

Compared with our previous publications, the presentation this year already orientates on the future requirements of pCbCR.

This results in the following new classification structure:

Overview of countries for 2024

in M€	Germany	Sweden	UK	The Netherlands	USA	Hungary	Other Countries	Totals
Revenues Unrelated Parties	93,539	396	1,286	374	2,675	95	539	98,904
Revenues Related Parties	43,046	1,804	4,048	3,237	228	2,563	96	55,021
Revenues	136,585	2,199	5,334	3,612	2,903	2,658	635	153,926
Profit or Loss before Income Tax	1,557	27	-52	-35	-85	145	98	1,654
Stated capital	66,101	1,855	2,897	-353	70	346	303	71,219
Accumulated earnings	13,456	-1,411	3,342	-1,234	28	132	-61	14,252
Number of employees	4,865	1,028	950	331	73	31	36	7,314
Tangible Assets	4,844	3,020	1,343	172	88	223	11	9,702
Income tax paid	438	59	22	50	0	109	1	679
Income tax accrued	127	61	41	34	0	55	1	318
Taxes borne								
Corporate income taxes	590	61	38	33	1	55	0	778
Employment taxes	72	24	14	8	1	0	0	121
Production taxes	0	2	79	14	0	1	0	96
Taxes on property	3	9	14	3	1	0	0	30
Other taxes	5	0	3	1	0	0	0	9
Total taxes borne	671	96	149	59	3	57	0	1,034
Taxes collected								
Excise taxes	227	0	1	10	2	4	0	244
Sales VAT	10,337	155	928	685	0	594	6	12,705
VAT on purchases	-9,950	-243	-964	-711	0	-636	0	-12,504
Net VAT	387	-88	-37	-26	0	-41	6	201
Payroll taxes	238	22	34	15	5	1	1	317
Total taxes collected	852	-66	-2	-1	7	-36	7	762
Total tax contribution								
Total tax contribution	1,523	30	147	58	10	20	7	1,796
Total Tax Rate	41%	155%	253%	-604%	-3%	39%	0%	54%

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

The following low-tax jurisdictions are also included in the Other section of the table before:

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 owns one legal entity — Uniper Energy Services MENA DMCC — in the UAE. It is disclosed in the Annual Report 2024 as a non-consolidated affiliated company for reasons of immateriality (valued at cost).

The following overview* shows which Uniper units are active in which countries and in which segments.

* The overview contains only fully consolidated companies and their foreign tax-able permanent establishments (PE, if material). The Notes to the Uniper Annual Report 2024 provides more information on shareholdings and their domiciles.

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

List of Abbreviations, Glossary, and Additional Information

List of Abbreviations

AI	Artificial Intelligence
BDEW	Association of Energy and Water Industries
BDI	Federation of German Industries
CbCR	Country-by-country reporting
CFO	Chief Financial Officer
COSO	Committee of Sponsoring Organizations of the Treadway Commission; see: coso.org
DAC6 and/or DAC7	Council Directive (EU) on Administrative Cooperation 6 and/or 7 and Amendment of the EU Mutual Assistance Directive
ECOFIN Council	Economic and Financial Affairs Council
EVP Tax	Executive Vice President for Tax
GRI	Global Reporting Initiative; "About this report" below provides more information
ICS	Internal Control System
IDW PS 980	Principles for auditing compliance management systems
LNG	Liquefied natural gas
OECD	Organization for Economic Cooperation and Development
pCbCR	Public Country-by-country reporting

SDGs	United Nations' Sustainable Development Goals
SVPs Tax	Senior Vice Presidents for Tax
Tax CMS	Tax compliance management system
TCO	Tax Compliance Officer
the Act	Tax Haven Defense Act

Glossary

Accumulated earnings	Accumulated earnings of the previous and current years at the end of the financial year without declared profit distribution
Corporate income taxes	Current taxes on income and earnings
Digitalization@Tax	Program to digitalize Uniper's tax function
Employer contributions	Employer contributions, particularly to social insurance
Employee contributions	Employee contributions, particularly to social insurance
Excise taxes	Essentially electricity and energy tax

List of Abbreviations, Glossary, and Additional Information

Income tax paid	Paid income tax of the financial year on a cash basis
Income tax accrued	Current tax expense of the financial year without deferred taxes and taxes for uncertain tax position and taxes for prior years
Low-tax jurisdictions	Countries in which an income tax rate below 10% is possible
Number of employees	Number of Uniper Group employees (deviations to Uniper's Annual Report are possible due to the allocation to operations outside Germany)
Net-zero target	Reduction of greenhouse gas emissions emitted by the company to a minimum. The remaining greenhouse gas emissions are offset by measures outside the business activities
OECD CbCR	Multinational corporations' Country-by-country reporting financial authorities
Other property taxes	Taxes resulting from property
Overall tax rate	Total tax burden relative to earnings before taxes
Production taxes	Taxes resulting from production processes
Profit or loss before income tax	The amount of profit or loss before income tax for the financial year
Public Country-by-country reporting	Country-by-country reporting pursuant to a directive that requires the publication of tax information in all EU member states
Revenues	Revenues for the financial year including revenues with related parties
Scope 1 and 2 and/or Scope 1 to 3 emissions	Scopes 1 to 3 of greenhouse gas emissions pursuant to the Greenhouse Gas Protocol; see: ghgprotocol.org

Social security contributions	Employer and employee social security contributions
Stated capital	Stated capital at the end of the financial year
Tangible Assets	Disclosure of tangible fixed assets other than cash according to OECD-CbCR definition
Uniper. The beating heart of energy.	uniper.energy/news/uniper-the-beating-heart-of-energy
Uniper Group Tax Guidelines	Uniper Group tax guidelines and regulations
Whistleblowing process	Process for reporting possible compliance violations

History of spotlight-on topics

2023 Uniper Tax Transparency Report	Global minimum taxation (Pillar Two)
2022 Uniper Tax Transparency Report	19-16-19-7 tax relief for end-consumers
2021 Uniper Tax Transparency Report	Digitalization@Tax
2020 Uniper Tax Transparency Report	DAC6

About this report

This report, which supersedes Uniper's prior-year 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

This report is published in English and German as a pdf that can be downloaded from our website.

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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 modify them to conform with future events or developments. This report relates to the past financial year and generally does not contain any statements on events that occurred after the balance-sheet date.

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