



# 2021 Tax Transparency Report



# Table of Contents

Uniper's Tax  
Transparency  
Approach >

Tax Strategy  
and Principles >

Tax Governance,  
Internal Control  
System, and  
Risk Management >

Spotlight on:  
Digitalization@Tax >

Stakeholder  
Engagement and  
Management  
of Tax Issues >

Country-by-Country  
Reporting >

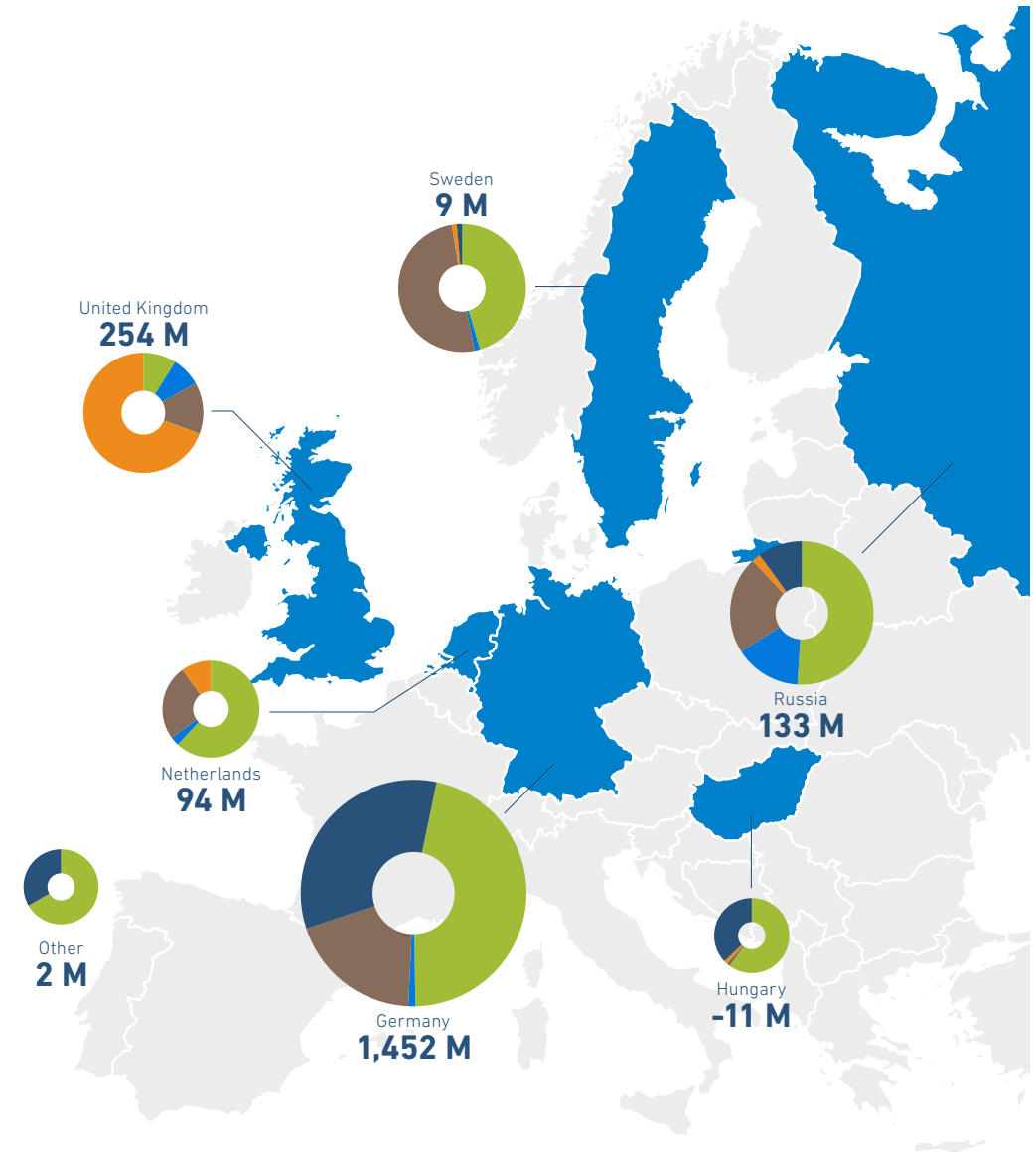
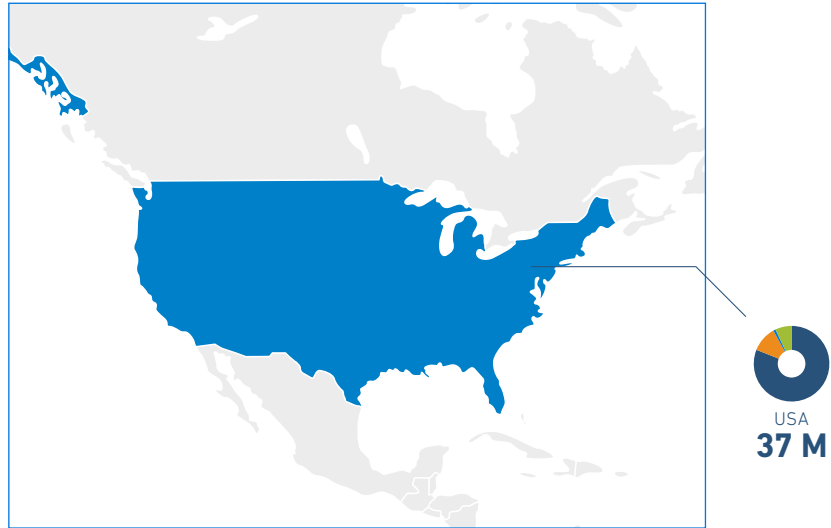
- > Uniper's Tax Contribution
- > Foreword
- > Uniper SE: Who We Are
- > Sustainability at Uniper:  
Our Responsibility  
toward Society

- > Uniper's Tax Transparency Approach
- > Tax Strategy and Principles
- > Tax Governance, Internal Control System, and Risk Management
- > Spotlight on: Digitalization@Tax
- > Stakeholder Engagement and Management of Tax Issues
- > Country-by-Country Reporting

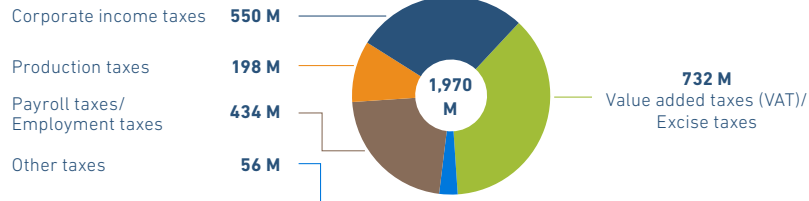
- Uniper's Tax Contribution >
- Foreword >
- Uniper SE: Who We Are >
- Sustainability at Uniper: Our Responsibility toward Society >

# Uniper's Tax Contribution

## Tax Contribution per Country (in €)



## Total Tax Contribution



Note: Deviations may occur due to rounding (see chapter Country-by-Country Reporting).

- › Uniper's Tax Transparency Approach
- › Tax Strategy and Principles
- › Tax Governance, Internal Control System, and Risk Management
- › Spotlight on: Digitalization@Tax
- › Stakeholder Engagement and Management of Tax Issues
- › Country-by-Country Reporting

Uniper's Tax Contribution ›

Foreword ›

Uniper SE: Who We Are ›

Sustainability at Uniper: Our Responsibility toward Society ›

“

This report supports global tax transparency and tax fairness and systematically continues our efforts in this area.

**Tiina Tuomela**, Chief Financial Officer



- › Uniper's Tax Transparency Approach
- › Tax Strategy and Principles
- › Tax Governance, Internal Control System, and Risk Management
- › Spotlight on: Digitalization@Tax
- › Stakeholder Engagement and Management of Tax Issues
- › Country-by-Country Reporting

Uniper's Tax Contribution ›

Foreword ›

Uniper SE: Who We Are ›

Sustainability at Uniper: Our Responsibility toward Society ›

# Foreword

As Uniper's CFO, I'm delighted to present our second Tax Transparency Report.

Our previous report, published in 2021, was the first to present our tax positions to the public simply and transparently. The EU's introduction of mandatory disclosures for tax-relevant information reaffirms our commitment to be proactive about tax transparency.

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 €2 billion in taxes worldwide in 2021. But what's a "fair share" of taxes?

All countries rely on tax revenues, which are essential for their long-term development. Tax revenues enable governments to fulfill their obligations toward their citizens, to take necessary action, and to invest in education, culture, environmental protection, and infrastructure. All of this benefits individuals and society as a whole.

Nevertheless, we don't believe that a fair share means paying a certain amount of taxes in a particular country. Instead, it means that our company recognizes the legitimate interests of all shareholders and stakeholders and our obligation to pay taxes. We adhere not only to the letter of tax laws, but also the spirit. Our approach to taxes is open, honest, and transparent.

We believe this approach enables us to pay our fair share of taxes across national boundaries. Uniper is committed to actively promoting the economic and social development of the municipalities and regions where we operate. We strive to always achieve a balance between fulfilling our responsibility as a taxpayer and addressing the legitimate interests and diverse expectations of our customers, suppliers, investors, employees, and other stakeholders. For us, this is what it means to pay our fair share.

Like last year's report, 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 global efforts and help us ensure that our various businesses meet their tax obligations.

Last year's report used EU-wide tax reporting requirements as an example of how Uniper addresses new tax challenges and puts in place processes to comply with new reporting requirements. In the future, we'll continue to present topics that exemplify our response to our continually evolving regulatory environment and to provide practical insights into our tax activities.

Consequently, the middle section of this report includes a new topic—Digitalization@Tax—along with practical examples of how we're implementing it.

Digitalization is affecting all walks of life, both private and corporate. It enhances our customer orientation, in-house processes, and cost effectiveness and thus is essential to our competitiveness. Digital solutions help us develop and implement customer-oriented products, automate processes, and thus ensure our long-term business success.

Although this report is an update, some information from the prior report remains valid and is therefore unchanged. However, our focus series and country-specific reporting of our key tax figures provide many new insights into our tax matters.

Tiina Tuomela  
CFO Uniper

- › Uniper's Tax Transparency Approach
- › Tax Strategy and Principles
- › Tax Governance, Internal Control System, and Risk Management
- › Spotlight on: Digitalization@Tax
- › Stakeholder Engagement and Management of Tax Issues
- › Country-by-Country Reporting

Uniper's Tax Contribution ›

Foreword ›

Uniper SE: Who We Are ›

Sustainability at Uniper: Our Responsibility toward Society ›

## Uniper SE: Who We Are

Uniper stands for tailor-made customer solutions in the energy sector – tackling the complex issues of the energy world.

We are a global energy company that generates, trades, and markets energy on a large scale.

We also procure, store, transport, and supply commodities, such as natural gas, LNG, and coal as well as energy-related products.

What makes us special is that we bring both technical and commercial expertise to the table and combine both for the benefit of our customers.

We seek innovative solutions and believe in the benefits of digitalization. With our versatile portfolio, we create added value for our customers. We offer tailored energy solutions and take away our customers' worries regarding their complex energy issues.

We do this more straightforwardly and better than others. In everything we do, we act responsibly:

We are driving the energy transition through decarbonization, customer focus, and security of supply: Uniper's history to date is characterized by continuous and successful development. For today's strong position in the market, we have worked hard and delivered what we promised, earning credibility and trust, especially among our customers, business partners, and our shareholders.



<https://www.youtube.com/watch?v=0wuXcBIG1eU>

# Empower Energy Evolution

- > Uniper's Tax Transparency Approach
- > Tax Strategy and Principles
- > Tax Governance, Internal Control System, and Risk Management
- > Spotlight on: Digitalization@Tax
- > Stakeholder Engagement and Management of Tax Issues
- > Country-by-Country Reporting

Uniper's Tax Contribution >

Foreword >

Uniper SE: Who We Are >

Sustainability at Uniper: Our Responsibility toward Society >

# Sustainability at Uniper: Our Responsibility toward Society

Sustainability is a high priority for Uniper. That is the reason why we have committed to carbon neutrality in our power generation business in Europe will be carbon neutral by 2035 and for the entire Group by 2050. Systematically implementing our coal exit plan and other measures will enable us to achieve more than 50% of the European Generation target by 2030. Given the demand for more energy and less carbon dioxide, pragmatism and willingness to change are required to generate the necessary energy and achieve effective carbon reduction. We understand and embrace this challenge. In line with our goal to propel the energy transition ("Empower Energy Evolution"), our strategy has three components: decarbonization, customer focus, and security of supply. Uniper will achieve these ambitious objectives by growing its existing green businesses and establishing new ones. Two of our most important new green businesses are hydrogen and renewables.

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

Our tax contributions in a wide range of countries enable us to make an essential contribution toward funding projects that support the 17 United Nations Sustainable Development Goals. Countries use these funds, for example, to reduce domestic poverty and to improve educational opportunities.

## Sustainable Development Goals



Uniper supports the 17 UN Sustainable Development Goals (SDGs)

- › Uniper's Tax Transparency Approach
- › **Tax Strategy and Principles**
- › Tax Governance, Internal Control System, and Risk Management
- › Spotlight on: Digitalization@Tax
- › Stakeholder Engagement and Management of Tax Issues
- › Country-by-Country Reporting

# 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.

Uniper is active in more than 40 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, Russia, 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 structure, which is continually evolving, 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 our Tax organization work together on tax matters.

These guidelines 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.

The CFO, who is a member of Uniper's Board of Management, has formal responsibility for tax compliance. The aforementioned guidelines delegate this responsibility to the Executive Vice President Tax (EVP Tax). Senior Vice Presidents 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.

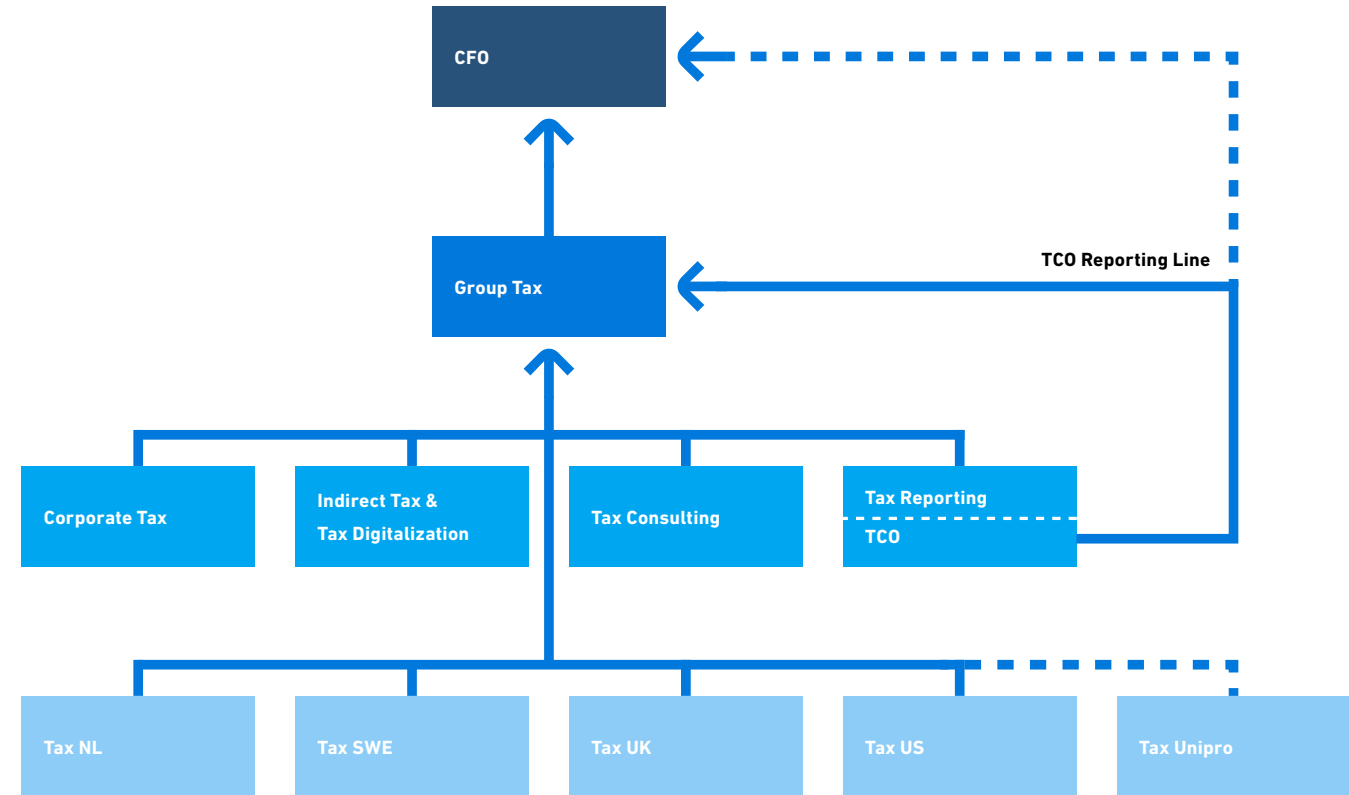
Taxation remains linked to how and in what country a company is incorporated. In addition, countries use their tax laws to compete with each other, and these laws are usually extremely complicated. Moreover, most tax systems have a large number of inconsistencies and lack harmonization. The Group Tax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

# 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 (except Tax Unipro in Russia) 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 work flows 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 damage to its reputation.



- › Uniper's Tax Transparency Approach
- › Tax Strategy and Principles
- › Tax Governance, Internal Control System, and Risk Management
- › Spotlight on: Digitalization@Tax
- › Stakeholder Engagement and Management of Tax Issues
- › Country-by-Country Reporting

# 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 Group organization. They are firmly established in the Code of Conduct and in internal guidelines and are being brought to life throughout the organization.

The regular review and, if necessary, update of our tax strategy and its implementation is 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 live classroom training. The target group for these modules consists primarily of all employees with contact to either 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 Board of Management 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 company 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 "Compliance with legal and tax regulations" or "Tone at the top."

- The specific ICS requirements define possible risks at the level of processes 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 effectiveness of the implemented ICS. All Uniper Group functions are involved in this process prior to the Board of Management confirming the ICS's effectiveness for the entire 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 Guidelines 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 procedure.
- Inform management and report to the Board of Management or a committee of the Supervisory Board (such as the Audit and Risk Committee) on compliance aspects.
- Monitor the Tax function's processes.

# Tax Governance, Internal Control System, and Risk Management

Uniper has in place an ICS and a Tax Compliance Management System (Tax CMS). Their purpose 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 period 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 continuously 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 re-

quired. 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, Uniper has the following main principles based on its Group Tax Guidelines:

- 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 relevant areas/ functions and stakeholders.
- 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 an economic risk as well. The Board of Management 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 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.



Numerous initiatives and regulations aim to achieve greater tax transparency and fairness. Harmonizing them would increase comparability between companies and countries and thus make a significant contribution to tax transparency, which we fully support.

**Tiina Tuomela**  
CFO Uniper

- › Uniper's Tax Transparency Approach
- › Tax Strategy and Principles
- › Tax Governance, Internal Control System, and Risk Management
- › **Spotlight on: Digitalization@Tax**
- › Stakeholder Engagement and Management of Tax Issues
- › Country-by-Country Reporting

# Focus on: Digitalization@Tax

## Focus on: Digitalization@Tax

The IT industry continues to offer an increasing variety of options for integrating digital solutions into internal and external business processes. It also addresses many special tax topics. All companies face the challenge of selecting the right solutions and efficiently integrating them into a sustainable tax IT infrastructure. They also must scrutinize their existing IT solutions and, if necessary, expand or replace them.

Uniper's Tax function reviews its digital solutions on a regular basis to assess their necessity and benefits. Deploying and expanding technical expertise is an essential part of this effort.

For digital solutions to be effective, employees need to be made aware of their need and use. This requires effective communications and training. The Tax function always conducts a cost-benefit analysis when considering which technical options could add value over the long term. The decisive factor is always whether such options meet our compliance requirements.

Uniper operates globally, and our business model faces continually evolving challenges as well as increasing legal obligations. This enlarges both the scope and complexity of the Tax function's compliance requirements. We use state-of-the-art digitalization and automation solutions to help meet these requirements.

Uniper proactively embraces technical possibilities in order to consistently increase the effectiveness and efficiency of its work processes and the quality of their results. Below we describe three projects that exemplify how these principles have been put into practice at Uniper:

- Process Automation: Credit-side Auditing of Accounts Payable
- Tax Data Lake
- Robotic Process Automation

### Process Automation: Credit-side Auditing of Accounts Payable

Accurate tax treatment of mass purchasing and sales transactions—such as the creation of outgoing invoices and the payment of incoming invoices—requires an enterprise resource planning (ERP) system. The ERP system automatically books and evaluates invoices for tax purposes on the basis of preset tax codes.

Automated invoice verification also involves machine learning (ML), which checks whether the legal requirements for incoming invoices are met. In addition, the ERP system performs semi-automated account assignment and books. This significantly reduces manual interventions and thus the potential for errors. The system also has analysis tools that perform check routines to further enhance compliance.

After invoice data are captured, they need to be evaluated in the form of reports, tax reports, and tax returns. For this purpose, we use tools that have a direct interface with the accounting system. These data are regularly checked for plausibility, processed, and finally made available for transmission to the tax authorities. These tools provide automated support for the entire prepara-

tion process and the fulfillment of ongoing declaration obligations for all Group companies.

### Tax Data Lake (TDL)

The archiving of tax-relevant data (such as documents, receipts, and calculations) and their availability pose significant challenges. All tax-relevant data must be stored for many years. They therefore must be archived electronically to the degree possible and also be accessible quickly and easily. Uniper's answer is the TDL, an indexed data pool with a cognitive search function for tax-relevant information. Creating the TDL involved modernizing the content and, above all, the technology of our data archiving infrastructure and connecting a wide variety of data sources. Data are continuously indexed. Other improvements include the continual optimization of the search function by means of text recognition in scanned documents. The availability of digital data offers employees and thus Uniper many advantages. For example, it provides maximum flexibility and supports remote working, which is essential amid the Corona pandemic.

- › Uniper’s Tax Transparency Approach
- › Tax Strategy and Principles
- › Tax Governance, Internal Control System, and Risk Management
- › **Spotlight on: Digitalization@Tax**
- › Stakeholder Engagement and Management of Tax Issues
- › Country-by-Country Reporting

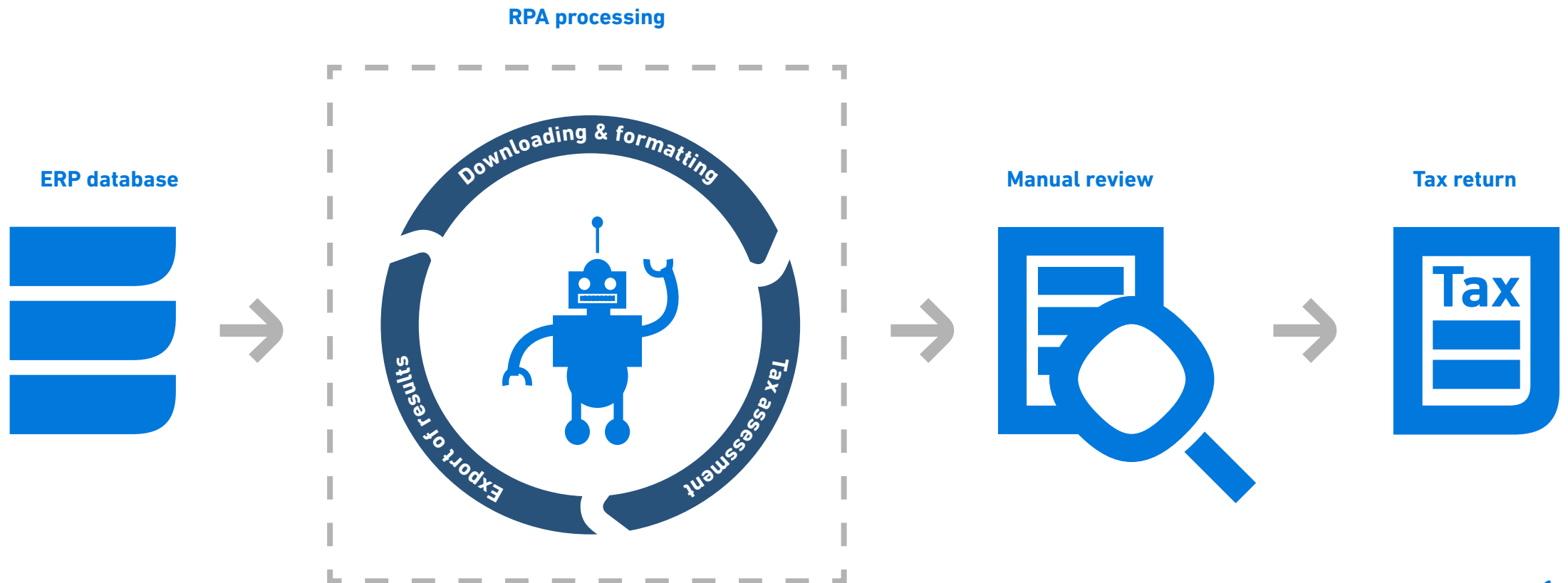
## Focus on: Digitalization@Tax

### Robotic Process Automation (RPA)

The Tax team also uses RPA, robotic programs that can automatically carry out process steps that were previously done manually. RPA is particularly helpful for rule-based recurring tasks. It realizes its full potential in the automated processing of mass transactions. To the degree possible, robots prepare and complete tasks for VAT reporting obligations in Germany and other countries as well as

for certain lump-sum declarations of payroll taxes. Tax staff then conduct quality checks of the results. This frees up staff to perform other activities and reduces the potential for manual errors. RPA has proved its worth many times over. Uniper’s RPA team therefore continually evaluates and implements new applications.

These three examples illustrate how important and, indeed, indispensable digitalization is for Uniper to optimize its processes and meet its tax obligations.





- › Uniper's Tax Transparency Approach
- › Tax Strategy and Principles
- › Tax Governance, Internal Control System, and Risk Management
- › Spotlight on: Digitalization@Tax
- › Stakeholder Engagement and Management of Tax Issues
- › Country-by-Country Reporting

# Stakeholder Engagement and Management of Tax Issues

# Stakeholder Engagement and Management of Tax Issues

Our principle of cooperative and constructive collaboration with the tax authorities as well as the prompt and consistent compliance with 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 appropriately address stakeholders' tax concerns.

A key tax development in 2020 was the European Union's (EU) adoption of a new tax reporting system. It requires the reporting of certain transactions referred to as "cross-border tax arrangements." The reporting system is also known by the abbreviations "DAC6" or "MDR." The reporting of such cross-border tax arrangements is intended to enable EU tax authorities to identify tax avoidance practices and profit shifting in a timely manner and to take steps to prevent them. Uniper complied with this system by developing a reporting process and implementing it Group-wide in 2020.

Our reporting process is designed to ensure that all the Group's relevant transactions are identified, analyzed, and reported in a timely, complete, and correct manner. The process is part of Uniper's Tax CMS. The 2020 Uniper Tax Transparency Report contains a detailed description of the reporting process's main feature starting on page 9.

The process has proven successful in practice. The review and reporting deadlines have been met. This also applies to highly complex underlying transactions. Helpfully, the process focuses on early communication of potentially relevant issues and involves key players in ongoing information sharing. This continuously reinforces awareness of these relatively new reporting obligations.

Since its implementation, the reporting process has been periodically reviewed and refined in order to further increase the efficiency of individual steps and to take account of technical developments. In particular, transaction processing and documentation has been enhanced by digitalization.

A team at the Tax function is responsible for monitoring and improving the process. This team also assesses emerging legislation and communicates its findings promptly to everyone involved. Consequently, central staff is available to explain particularly complex issues.

- › Uniper's Tax Transparency Approach
- › Tax Strategy and Principles
- › Tax Governance, Internal Control System, and Risk Management
- › Spotlight on: Digitalization@Tax
- › Stakeholder Engagement and Management of Tax Issues
- › **Country-by-Country Reporting**

# Country-by-Country Reporting

# Country-by-Country Reporting

Uniper is active in more than 40 countries and has around 11,500 employees. Uniper Group companies pursue a range of business activities and are therefore assigned to the following segments:

## 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

The Russian Power Generation segment brings together the operating power generation business of the Uniper Group in Russia. PAO Unipro, a subsidiary of Uniper SE 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.

## 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 Group level.

Overall, activities focus mainly on a secure energy supply and associated services. The most important activities include power generation and global energy trading.

The key tax figures resulting from these business activities for the year 2021 are summarized in this section and presented in tabular form for each country on the following page.

# Country-by-Country Reporting

## Overview of Countries in 2021

in M€	Germany	Sweden	Russia	Great Britain	The Netherlands	USA	Hungary	Other	Total
Profit before corporate income taxes	-3,244	-548	-49	-538	-330	225	-70	-59	-4,613
Stated Capital	70,218	1,813	2,133	486	93	89	7	432	75,271
Accumulated earnings	16,156	-1,407	1,780	401	-822	49	-84	-72	16,001
Assets used in operations	3,703	5,418	1,804	1,183	314	1	105	92	12,620
Interest-bearing loan receivables	11,357	601	19	176	991	17	0	180	13,341
Number of employees	4,831	905	4,267	992	324	80	33	62	11,494
<b>Total tax contribution</b>	<b>1,452</b>	<b>9</b>	<b>133</b>	<b>254</b>	<b>94</b>	<b>36</b>	<b>-11</b>	<b>2</b>	<b>1,970</b>
<b>Total tax rate*</b>	<b>-18%</b>	<b>-7%</b>	<b>-272%</b>	<b>-63%</b>	<b>-7%</b>	<b>14%</b>	<b>-34%</b>	<b>1%</b>	<b>-22%</b>
<b>Taxes borne</b>									
Corporate income taxes	483	2	14	+0	+0	29	22	-1	550
Production taxes	5	2	3	177	10	0	1	0	198
Employment taxes	66	32	19	11	7	1	+0	+0	137
Taxes on property	10	-2	10	19	2	+0	+0	+0	40
Cost of indirect taxes	4	+0	0	2	1	0	+0	+0	7
<b>Total taxes borne</b>	<b>569</b>	<b>35</b>	<b>46</b>	<b>208</b>	<b>20</b>	<b>31</b>	<b>23</b>	<b>-1</b>	<b>932</b>
<b>Taxes collected</b>									
Net VAT	385	-55	67	22	44	0	-38	2	427
<i>Sales VAT</i>	16,277	218	223	1,360	624	0	276	12	18,988
<i>VAT on purchases</i>	15,891	273	156	1,338	580	0	314	10	18,561
Payroll taxes	213	29	10	24	16	3	+0	+0	297
Excise taxes	285	0	0	+0	14	3	3	0	305
Withholding taxes	0	0	10	0	0	0	0	0	10
<b>Total taxes collected</b>	<b>883</b>	<b>-26</b>	<b>87</b>	<b>46</b>	<b>74</b>	<b>6</b>	<b>-35</b>	<b>3</b>	<b>1,038</b>

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

# Country-by-Country Reporting

The following "low-tax jurisdictions" are also included in the "Other" section in the previously shown table.

## Malta

Uniper is the sole shareholder of an insurance company and a holding company in Malta. They 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 two companies in the UAE that conduct oil production and trading activities. Uniper is also the sole shareholder of a service company in the UAE. All of these companies are operational, and they own local assets and have employees. Uniper's income in the UAE is not subject to corporate income tax as the UAE does not have such a tax system.

<sup>1</sup> The overview include only fully consolidated companies and their foreign, taxable permanent establishments (if material). Other information on shareholdings and their domiciles can be found in the list of shareholdings in the Notes to the Consolidated Financial Statements of Uniper's 2021 Annual Report.

The spreadsheet below provides an overview of Uniper entities by country and segments.<sup>1</sup>

Country	European Generation	Global Commodities	Russian Power Generation	Administration/Consolidation
Germany	Rhein-Main-Donau GmbH	Uniper Global Commodities SE	NA	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	RGE Holding GmbH		Uniper International Holding GmbH
	Uniper Wärme GmbH	Uniper Hydrogen GmbH		
Sweden	Uniper Technologies GmbH			
	Sydskraft Thermal Power AB	NA	NA	Sydskraft AB
	Sydskraft Hydropower AB			Sydskraft Försäkring AB
	Kolbäckens Kraft KB			
	Sydskraft Nuclear Power AB			
	OKG AB			
Russia	NA	NA	PAO Unipro	NA
UK	Uniper UK Limited	Holford Gas Storage Limited	NA	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 Benelux Holding B.V.	Uniper Infrastructure Asset Management B.V.	NA	NA
	Utilities Center Maasvlakte Leftbank B.V.	Uniper Ruhrgas BBL B.V.		
USA	Uniper Benelux N.V.	Uniper Gas Transportation and Finance B.V.		
	NA	Uniper Global Commodities North America LLC	NA	NA
Hungary	Uniper Hungary Energetikai Kft.	NA	NA	NA
Canada	NA	Uniper Trading Canada Ltd.	NA	NA
Malta	NA	NA	NA	Ergon Insurance Ltd Ergon Holdings Ltd
UAE	NA	Uniper Energy DMCC	NA	NA

## List of Abbreviations, Glossary, and Additional Information

<b>CFO</b>	Chief Financial Officer
<b>COSO</b>	Committee of Sponsoring Organizations of the Treadway Commission / private organization which publishes standards for financial reporting and risk management; see: <a href="http://coso.org">coso.org</a>
<b>DAC6</b>	Council Directive (EU) on Administrative Cooperation
<b>ERP system</b>	Enterprise resource planning system / an IT system for a company's business processes
<b>EVP Tax</b>	Executive Vice President Tax
<b>GRI</b>	Global Reporting Initiative / see explanation below: About this Report
<b>ICS</b>	Internal Control System
<b>MDR</b>	Mandatory Disclosure Regime of the OECD / see explanation above: DAC6
<b>ML</b>	Machine learning / a form of artificial intelligence in which a system uses algorithms to analyze and draw inferences from patterns in data and to propose solutions
<b>RPA</b>	Robotic Process Automation / software robots that automatize formerly manual processes
<b>SDGs</b>	UN Sustainable Development Goals
<b>SVPs Tax</b>	Senior Vice Presidents Tax
<b>Tax CMS</b>	Tax Compliance Management System
<b>TCO</b>	Tax Compliance Officer
<b>TDL</b>	Tax Data Lake / an electronic archive of tax-relevant data
<b>VAT</b>	Value added taxes

# List of Abbreviations, Glossary, and Additional Information

<b>Assets used in operations</b>	Tangible fixed assets including the Nuclear Waste Fund (Sweden)
<b>Corporate income taxes</b>	Current taxes on income, including trade taxes
<b>Digitalization@Tax</b>	Program to digitalize Uniper's Tax function
<b>Employment taxes</b>	Employer's contributions, in particular to social security
<b>Empower Energy Evolution</b>	Uniper's strategy to propel the energy transition; see: <a href="http://uniper.energy/3e">uniper.energy/3e</a>
<b>Excise taxes</b>	Essentially electricity and energy taxes
<b>Low-tax jurisdictions</b>	Countries that conduct or allow income taxation with a tax burden below 10%
<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>Payroll taxes</b>	Employees' wage taxes and contributions, in particular to social security
<b>Production taxes</b>	Taxes resulting from production processes
<b>Taxes on property</b>	Property-related taxes
<b>Total tax rate</b>	Total taxes borne relative to pretax profit
<b>Uniper Group Tax Guidelines</b>	Tax guidelines and regulations at the Uniper Group
<b>Whistleblowing Procedure</b>	Procedure for reporting possible compliance violations

## About this Report

Like Uniper's Sustainability Report, this report is also based on the currently valid standards of the Global Reporting Initiative (GRI), in particular the publication *GRI 207: Taxes*. The GRI is a private organization that publishes standards for sustainability reporting. For more information, visit: [globalreporting.org](http://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.

