Tax Transparency Report 2023

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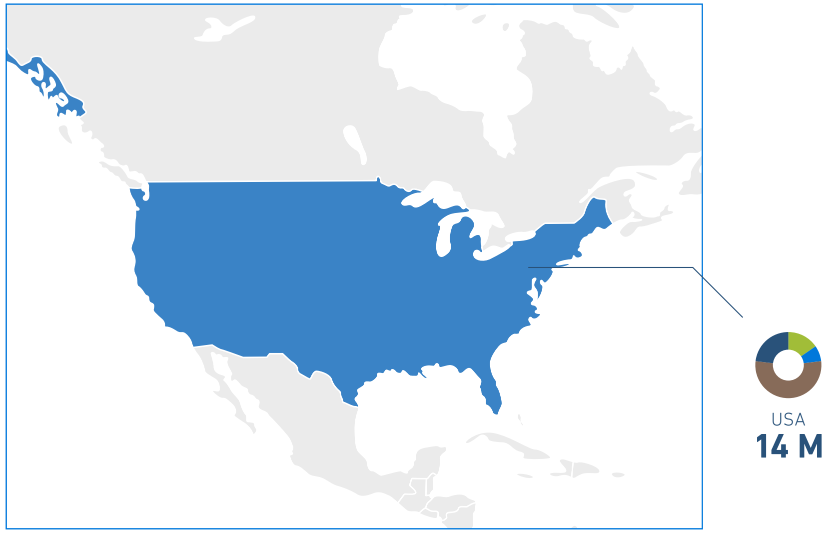
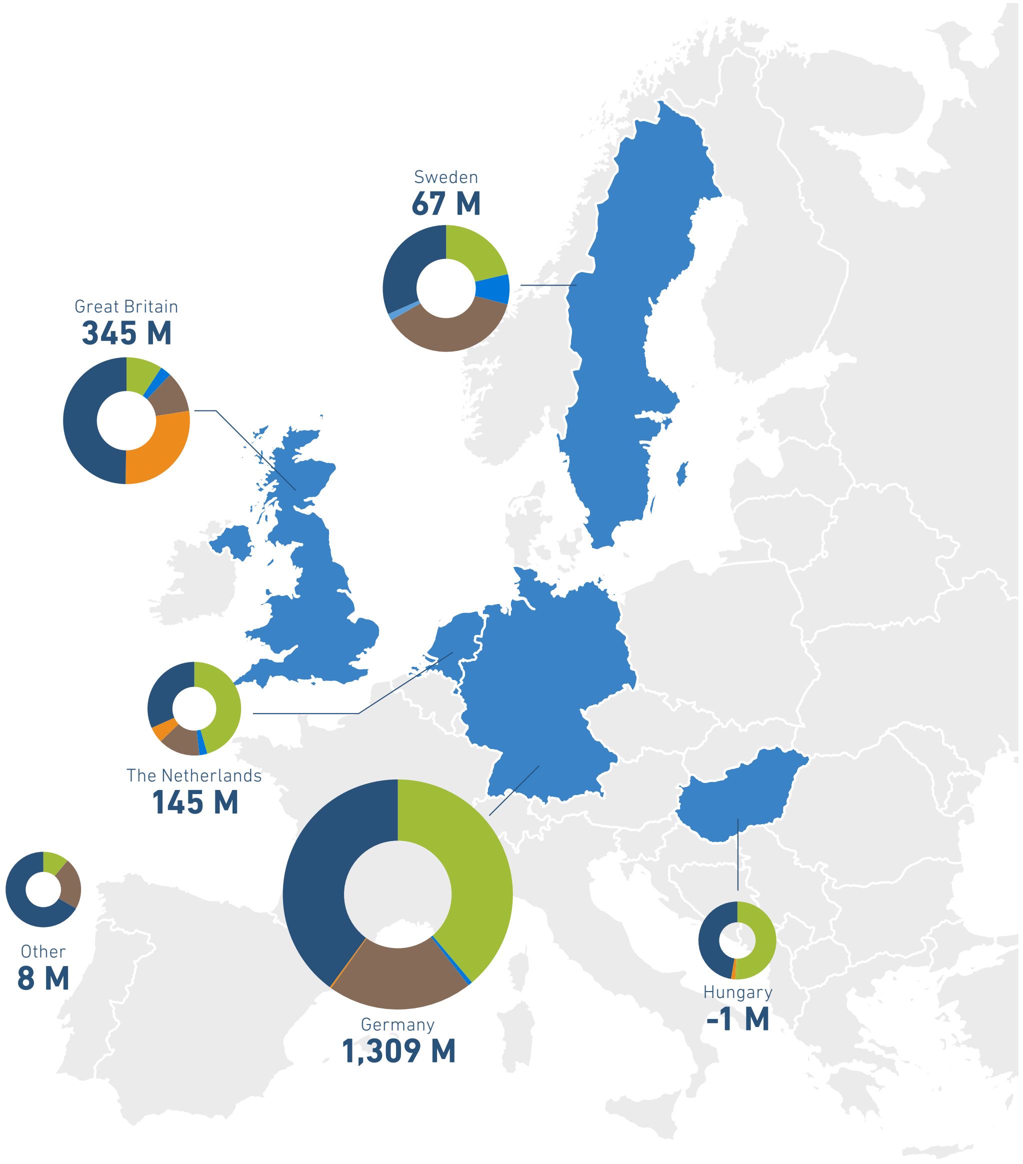
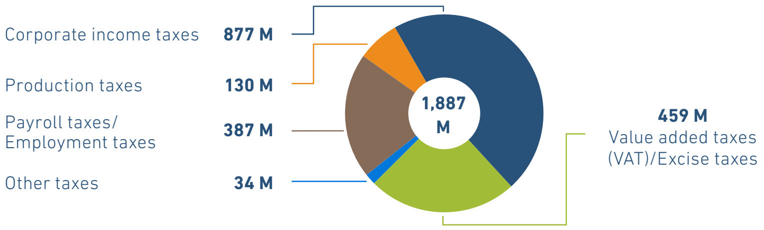
Uniper's tax contribution

Tax contribution by country (€)





Total tax contribution



Notes:
- Rounding may result in minor deviations from the totals (see the "Country-by-country reporting" chapter).
- The Russian Power Generation segment, consisting of our majority stake in PAO Unipro, was deconsolidated and classified as a discontinued operation in our Consolidated Financial Statements effective December 31, 2022, owing to our lack of decision-making authority and scope for intervention (see the Uniper Annual Report 2023). Consequently, this report contains no presentation of these activities.

Foreword

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The implementation of our new corporate strategy is Uniper's contribution to shaping a successful, sustainable energy transition.

Dr. Jutta A. Dönges, Chief Financial Officer

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.

About a year ago, we emphasized here how important the support and stabilization of our system-critical company is so that it could continue to ensure supply security and what additional responsibility this has placed on Uniper. Now, one year later, we can look back on a very positive business performance in 2023. Uniper:

- only had to utilize a portion of available stabilization support and reduced existing credit lines ahead of schedule
- took appropriate steps to ensure that no additional stabilization support will be needed in the future
- posted extraordinarily good results in 2023 in a favorable market environment
- already fulfilled some of the stabilization package's remedies and is generally making good progress in this area.

Extraordinarily high earnings resulted in the Group's tax contribution reaching the substantial figure of €1.9 billion.

We remain aware of the great efforts made by all those involved—the Germany federal government and, indirectly, taxpayers—to save our company. We took what we learned from the developments of the last two years to give our company a stable foundation.

Our new corporate strategy, which we explain in more detail in the "Uniper – Accelerating the energy transition" section below, will help shape a successful, sustainable energy transition.

This is also reflected in our tax strategy: we ensure fair and appropriate taxation of our activities in the countries in which we operate and support global efforts to achieve tax justice and combat tax avoidance and evasion. The OECD's and G20's Pillar Two initiative to reform international taxation to achieve global minimum taxation is an important step toward achieving these global objectives and is this year's "Spotlight on" topic.

Compliance with all applicable tax laws and regulations in the countries in which we operate remains a necessity for our tax strategy. We have a comprehensive tax compliance management system that we review and update on a regular basis. We maintain a constructive and respectful dialog with tax authorities and strive to clarify tax issues at an early stage. We continue to invest in the automation and digitalization of our tax processes to ensure that our tax function continues to have optimal capabilities in the future as well. We use advanced technologies to record, analyze, and communicate our tax data more efficiently. We also promote our tax employees' digital skills and lifelong learning.

We know that the shortage of people with tax expertise is a challenge. We address it in part by taking targeted measures to develop and retain staff. As an attractive employer, we also attach great importance to promoting diversity and inclusion. A reflection of this is that around 50% of our Tax department's employees and managers are women. We currently employ people from more than 80 countries and have a special corporate culture that we call The Uniper Way. Diverse and inclusive collaboration leads to better results, more innovation, and greater satisfaction.

We appreciate your interest in our report and look forward to your feedback. We invite you to follow our journey and join us shaping the energy transition.

Dr. Jutta A. Dönges
Chief Financial Officer

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

Düsseldorf-based Uniper is an international energy company with activities in more than 40 countries. The company and its roughly 7,000 employees make an important contribution to supply security in Europe.

Uniper's operations encompass 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. The company owns and operates gas storage facilities with a total capacity of more than 7 billion cubic meters.

Uniper intends to be completely carbon-neutral by 2040. Uniper aims for its installed power generating capacity to be more than 80% zero-carbon by 2030. To achieve this, the company is transforming its power plants and facilities and investing in flexible, dispatchable power generating units. Uniper is already one of Europe's largest operators of hydropower plants and is helping further expand solar and wind power, which are essential for a more sustainable and secure future. The company is progressively expanding its gas portfolio to include green gases like hydrogen and biomethane and aims to convert to these gases over the long term.

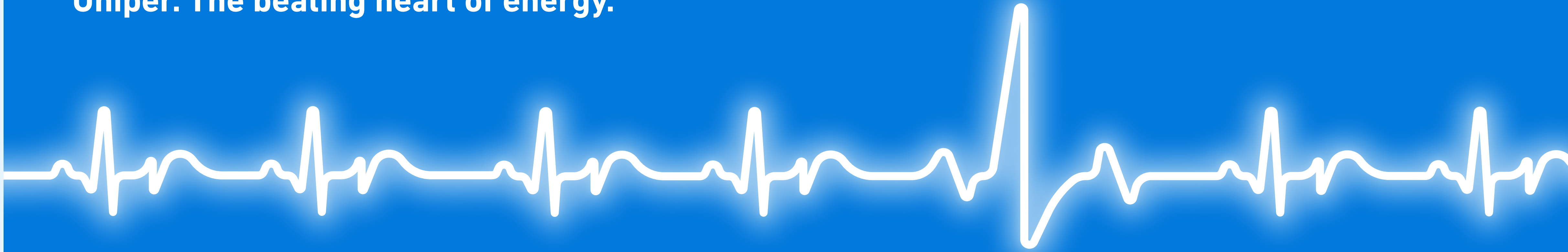
Uniper is a hydrogen pioneer, is active worldwide along the entire hydrogen value chain, and is conducting projects to make hydrogen a mainstay of the energy supply.

Our specialty is the production of flexible low-carbon power that is available when needed.

Uniper helps achieve a sustainable, low-carbon world and supports the energy transition. We are likewise committed to making a significant contribution to supply security.

We are as central to the energy system as the heart is to the body. Because our energy is the engine that drives industry and daily life. This is especially true in times of scarce energy and major climate challenges. Like no other company, we master the interplay between power and gas—regionally and on international markets. Our new slogan sums up the role we play in society: Uniper is the beating heart of energy.

Uniper. The beating heart of energy.



Sustainability at Uniper: our responsibility toward society

Climate change is one of today's biggest global challenges. Addressing it will require significant reductions in gases that are harmful to the earth's climate. 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 the 1990 base year and for climate neutrality to be achieved by 2050. Germany aims to achieve climate neutrality by 2045.

Uniper recognizes its special task and responsibility to propel the energy transformation.

We set targets to reduce the Uniper Group's Scope 1 and 2 emissions by at least 55% by 2030 (relative to 2019) and to achieve climate neutrality in these scopes by 2035. Uniper aims for the Group's Scope 1 to 3 emissions to be climate-neutral by 2040—ten years earlier than previously planned. Consequently, Uniper plans to end coal-fired power generation by 2029[1]. This 2029 target moves our coal phaseout forward by more than eight years compared with our previous intentions. In addition, we are consistently and steadily decarbonizing our business units that are currently still fossil-based.

Under our new strategy, we will remain an integrated electricity and gas supply company with a strong focus on our 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. We will offer our customers integrated solutions with green and flexible electricity and gas products that are flexible, balanced, and bespoke to help them achieve their own decarbonization targets.

What makes an energy company sustainable from a tax perspective?

Making our business segments structurally more sustainable contributes directly to reducing emissions.

In addition, 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. For example, countries use these funds to reduce poverty domestically, improve educational opportunities, and give people access to cleaner, more affordable energy

[1]Assuming the divestment of Datteln 4 pursuant to the European Commission's remedies

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

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. 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 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.

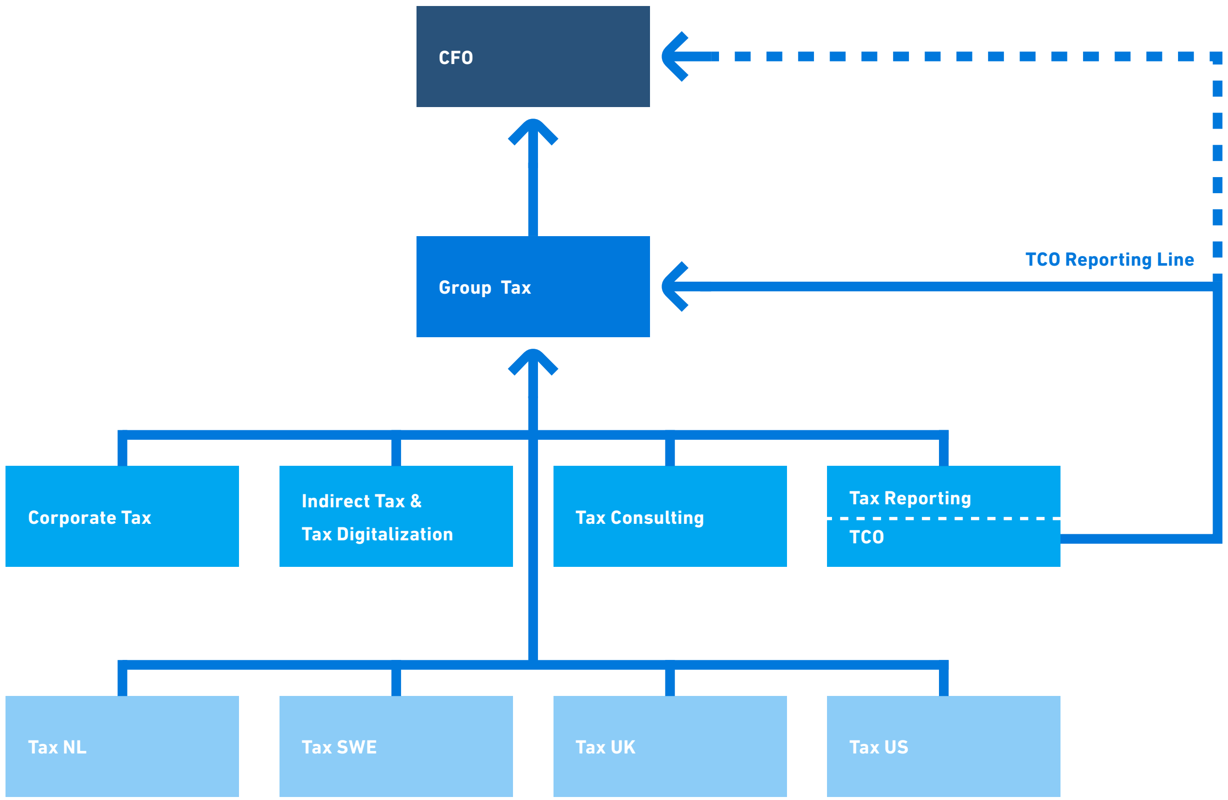
Taxation remains linked to how and in what country a company is incorporated. In addition, countries use their tax laws to compete with each other, and these laws and international framework conditions are usually extremely complicated. Moreover, most tax systems have a large number of inconsistencies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



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 all 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, the members of the Uniper SE Management Board and senior executives, including those in 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 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, inter alia, 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 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 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 at Uniper. The main objectives of tax risk management derived from this are in line with the Compliance Policy 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.
- Integrate findings 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.

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 pursuant to IDW PS 980 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.

"The challenges of the future are huge, diverse, and, at the same time, full of opportunities. Get to know our special and probably unique corporate culture and follow us on The Uniper Way.

Dr. Jutta A. Dönges
Chief Financial Officer

The Uniper Way
The Uniper Way describes how we want to work together as individuals, within teams, and across our organization. It serves as the compass to guide how we implement our strategy and how to serve our customers. Curious? Then we invite you to learn more about our special corporate culture and follow The Uniper Way at this link:
https://www.uniper.energy/career/working-uniper/uniper-way

Spotlight on: Pillar Two global minimum tax

Spotlight on: Pillar Two global minimum tax

What is Pillar Two?

The OECD's base erosion and profit shifting (BEPS) initiative has published detailed rules for implementing the reform of the international tax system to combat multinational companies' tax-avoidance strategies. The levying of a top-up tax is designed to ensure that income is taxed at an effective rate of at least 15%, regardless of the country in which it is generated.

Global minimum taxation aims to prevent tax avoidance and ensure that multinational companies pay an appropriate amount of tax where they do business. It also seeks to discourage competition for low tax rates and promote transparency on corporate profits and taxes. The global minimum tax applies to companies with consolidated revenues of more than €750 million. The OECD estimates that this affects around 8,000 companies worldwide and around 800 companies in Germany, including the Uniper Group.

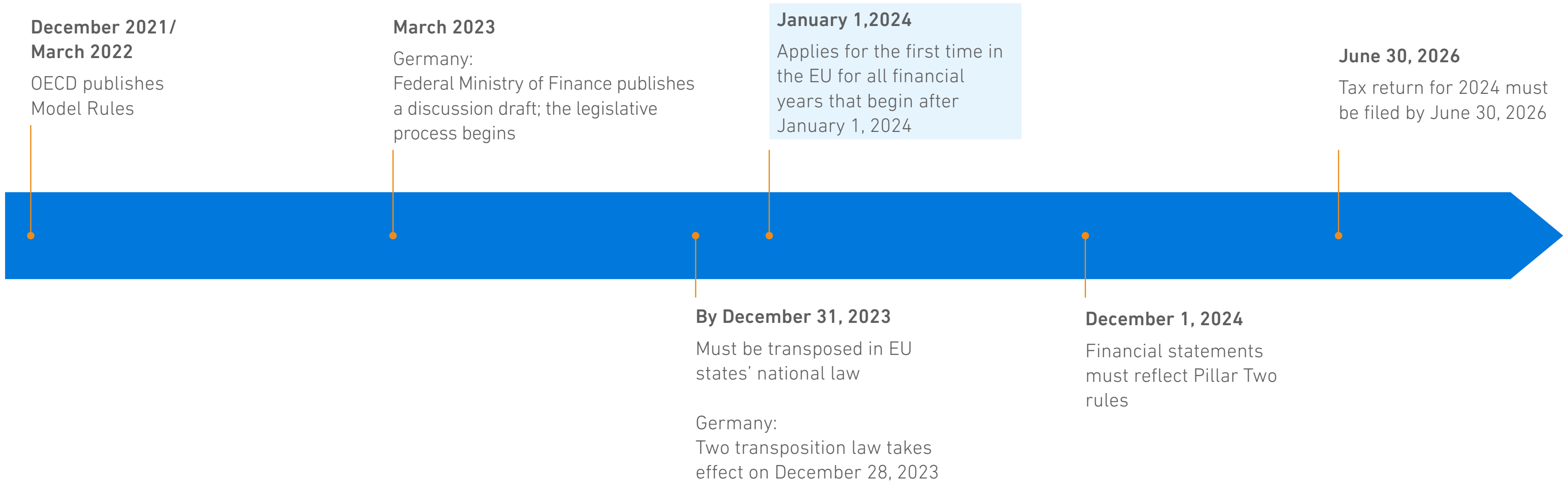
Time frame

The OECD Model Rules, the framework for international minimum taxation agreed on by over 140 countries worldwide, were published on December 20, 2021. However, Pillar Two's specific details and implementation may vary by country as it is transposed into national law. Following approval by the Bundestag and Bundesrat and the law's publication at the end of December 2023, the regulations took effect in Germany on January 1, 2024.

The global minimum taxation rules will apply in the EU for the first time for financial years beginning after December 31, 2023. Accordingly, the regulations are mandatory for Uniper SE as the Group parent company and thus also for all Group subsidiaries and business units from January 1, 2024, onward and must be reflected in 2024 financial statements. In addition, the notes to the 2023 consolidated financial statements must contain a qualitative statement on the possible or anticipated adverse impact of minimum taxation.

The first Pillar Two tax return is for 2024 and must be filed by June 30, 2026.

The United Kingdom, the Netherlands, and Sweden also passed similar laws that have already taken effect. The United States currently has no plans to introduce Pillar Two rules because its own global intangible low-taxed income (GILTI) rules already provide for a minimum tax on foreign income. It is currently uncertain whether these rules could be amended so that this tax can be integrated into the global system.



Spotlight on: Pillar Two global minimum tax

Substantive rules and how they work

Pillar Two ensures a globally uniform taxation system with a globally comparable calculation of the effective tax rate by introducing a complex calculation mechanism with its own rules for determining profits. Pillar Two's tax calculation is not based on earnings under applicable commercial or tax law, but on the IFRS income shown on a subsidiary company's or business unit's own financial statements. Taking into account numerous adjustments, the IFRS income of each reportable group company and business unit is reconciled to global anti-base erosion (GloBE) income. Altogether, more than 200 different items must be checked and, if necessary, reconciled from IFRS income to GloBE income.

After GloBE income has been calculated for all relevant business units, the associated covered taxes must be assessed and measured.

The Pillar II calculation is based on a country-by-country approach. Consequently, the covered taxes and GloBE income of all companies and business units in a country are added together (Pillar Two calls this jurisdictional blending) to calculate the effective tax rate (ETR). Cross-border offsetting—that is, offsetting between high- and low-taxed group companies in different countries—is not permitted. The decisive factor for the creation of a top-up tax due to low taxation in a country is whether the country's total ETR is less than 15%.

Because Uniper operates in more than 40 countries, the global minimum taxation rules had to and must still be analyzed intensively and reviewed on an ongoing basis.

Simplifications

The rules include simplifications, known as safe harbors, to reduce the requirements resulting from Pillar Two's introduction.

The rules of the safe harbors, some of which are temporary, contain three tests, one of which must be passed to avoid a top-up tax.

1. De minimis test

As part of a defined simplified materiality test, countries do not fall within Pillar Two's scope, at least temporarily, if the revenues or profits generated there do not reach the required thresholds of €10 million and €1 million, respectively.

2. Simplified ETR test

The simplified ETR test is met if the effective tax rate determined according to simplified principles reaches or exceeds a certain minimum threshold that evolves over time (for example, 15% for the 2024 financial year).

3. Routine profit test

The routine profit test is met if the minimum taxable profit determined according to the simplified calculations is equal to or less than a substance-based tax-free amount, which depends, among other things, on the payroll and the amount of fixed assets.

If at least one of the three tests is met, no full calculation is required and the top-up tax for this tax jurisdiction is zero.

The data required for the tests can be determined temporarily on the basis of OECD country-by-country reporting (OECD CbCR). Like Pillar Two, OECD CbCR is based on country-by-country income tax reporting. This can make things easier, especially for the transitional period through 2026, but also requires additional research and administration effort, because the figures need to be adjusted and prepared for the tests. Under the permanent safe harbor rules, however, CbCR figures will no longer be used, but rather a simplified calculation based on GloBE rules.

Global minimum tax (15%)	
Scope	**Group revenues > €750 million**
Objective	**Limit international tax competition, tax global earnings at a minimum rate of 15% on a country-by-country basis**
Implementation at Uniper	**Introduce an IT tax-calculation tool to calculate each country's effective tax rate and, if applicable, the top-up tax**
Simplifications	**Create safe harbors and temporary synergies by using existing OECD CbCR**

Spotlight on: Pillar Two global minimum tax

Implementation at Uniper

Uniper is a multinational company with consolidated Group revenues of over €750 million and therefore must apply and implement the rules on global minimum taxation. The collection and processing of the data necessary to calculate Pillar Two require a revision of data management. This is because a new IFRS reference figure is now decisive in addition to the previous tax calculation. In addition, many data points are required per relevant business unit in order to perform the calculations. Close and constructive cooperation between the Tax department and the Accounting department, among others, is therefore an absolute prerequisite and essential for successful implementation. New processes must be defined and introduced in all our global Group's units. The tax effects resulting from the global minimum taxation rules must be reflected in the Group's and its individual companies' financial statements and therefore must be independently audited. Additional processes are therefore necessary for the preparation and audit of financial statements in order to meet all substantive requirements in a timely manner. In addition, these processes must be included, documented, and audited as part of our existing tax compliance management system.

Process automation and digitalization are of great importance at Uniper. We therefore use an IT-supported calculation tool that meets the Pillar Two rules' and calculates the effective tax rate and, if applicable, the top-up tax on a country-by-country basis.

Initial calculations and simulations indicate that Uniper will not face any significant burdens from the aforementioned rules. However, the additional country-by-country calculation and the entire implementation of a very complex set of rules represent a significant human-resource challenge for Uniper Tax and other departments involved. Even the temporary simplification rules require a review of their applicability and therefore create additional administrative work.

Existing reporting pursuant to the OECD, Pillar Two, and the Global Reporting Initiative (GRI) as well as the introduction of public CbCR on January 1, 2025, aim to enhance tax transparency and tax justice. Their rules and areas of application are in some cases very similar. Consequently, greater harmonization of the various reporting requirements would lead to welcome simplifications. This would increase the comparability of the aforementioned CbCRs and reduce system-related deviations between the key tax metric to be reported.

Update on selected spotlight-on topics of our previous publications:

- **19-16-19-7(-19) tax relief for end-consumers**

The legislated temporary reduction of the VAT on natural gas and district heating service from 19% to 7% expires on March 31, 2024. As in prior years, all necessary departments are involved in implementing the reversal of the temporary tax rate reduction and ensuring that the standard tax rates are invoiced correctly and on time.

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.

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.[1] 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.

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.

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.

[1] 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).

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 for tax payers as well as for our company without altering anticipated tax revenues or the tax audit per se.

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

The fostering of cooperation between tax authorities and taxpayers creates a good basis for collaborating with tax authorities to modernize the tax legal 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 and, pursuant to our internal reporting setup, are assigned to the following operating 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-cycle gas turbine 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 energy to major customers via the traded 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 traded 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. Uniper sells natural gas to resellers (e.g., municipal utilities), major industrial customers and power plant operators on the basis of differently structured contracts. This segment additionally includes infrastructure investments and gas storage operations.

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 2023 are summarized in the following section and presented in tabular form for each country.

Country-by-country reporting

Overview of Countries 2023

in M€	Germany	Sweden	Great Britain	The Netherlands	USA	Hungary	Other	Total
Profit before corporate income taxes	4,539	1,748	638	-150	5	291	-139	6,933
Stated capital	69,949	2,082	2,810	587	129	264	274	76,096
Accumulated earnings	17,267	-1,218	3,390	-294	93	29	-94	19,173
Assets used in operations	5,903	2,967	1,449	173	71	205	4	10,772
Number of employees	4,517	968	920	308	69	36	59	6,877
Total tax contribution	**1,309**	**67**	**345**	**145**	**13**	**-1**	**8**	**1,886**
Total tax rate	**13%**	**4%**	**45%**	**-50%**	**77%**	**19%**	**-4%**	**16%**
Taxes Borne								
Corporate income taxes	521	37	210	46	3	54	6	877
Production taxes	1	1	117	8	0	2	0	130
Employment taxes	64	22	13	8	1	0	0	108
Taxes on property	3	9	9	3	1	0	0	25
Other taxes borne	5	0	3	1	0	0	0	9
Total taxes borne	**595**	**70**	**352**	**65**	**6**	**56**	**6**	**1,149**
Taxes collect								
Net VAT	301	-25	-41	54	0	-62	1	229
Sales VAT	*12,858*	*187*	*2,031*	*1,152*	*0*	*534*	*18*	*16,780*
VAT on purchases	*-12,556*	*-212*	*-2,071*	*-1,098*	*0*	*-595*	*-17*	*-16,550*
Payroll taxes	203	22	31	14	6	1	2	279
Excise taxes	210	0	2	12	2	4	0	229
Other taxes collected	0	0	0	0	0	0	0	0
Total taxes collected	**714**	**-3**	**-7**	**79**	**8**	**-57**	**3**	**737**

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

Country-by-country reporting

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)

On May 31, 2023, Uniper completed the sale of 100% of the shares in its United Arab Emirates-based crude oil processing and marine fuel trading business (Uniper Energy DMCC), following the fulfillment of conditions precedent and the receipt of regulatory approvals. Divestment of this non-strategic shareholding is part of the remedies Uniper must fulfill pursuant to the EU's state-aid approval.

Since this date, Uniper only owns one legal entity—Uniper Energy Services MENA DMCC—in the UAE. It is disclosed in the Annual Report 2023 as a non-consolidated affiliated company for reasons of immateriality (valued at cost).

The following overview[3] 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	
	Uniper Renewables GmbH	LNG Terminal Wilhelmshaven GmbH	
		Elektrolyse Mitteldeutschland GmbH	
Sweden	Sydkraft Thermal Power AB	Sydkraft Hydrogen AB	Sydkraft AB
	Sydkraft Hydropower AB		Sydkraft Försäkring AB
	Kolbäckens Kraft KB		
	Sydkraft Nuclear Power AB		
	OKG AB		
Great Britain	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	
	Uniper Technologies Limited	Uniper Hydrogen UK Limited	
The Netherlands	Uniper Benelux Holding B.V.	Uniper Infrastructure Asset Management B.V.	NA
	Utilities Center Maasvlakte Leftbank B.V.	Uniper Gas Transportation and Finance B.V.	
	Uniper Benelux N.V.	Uniper Hydrogen Netherlands B.V.	
USA	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

[3]The overview contains only fully consolidated companies and their foreign taxable permanent establishments (if material). The Notes to the Uniper Annual Report 2023 provide more information on shareholdings and their domiciles.

List of Abbreviations, Glossary, and Additional Information

BDI	Federation of German Industries
BEPS	Base erosion and profit shifting
CbCR	Country-by-country reporting
CFO	Chief Financial Officer
COSO	Committee of Sponsoring Organizations of the Treadway Commission; see: https://www.coso.org
DAC6 and/or DAC7	Council Directive (EU) on Administrative Cooperation 6 and/or 7 and Amendment of the EU Mutual Assistance Directive
ETR	Effective tax rate: tax rate that equals the ratio of covered taxes to a country's GloBE income
EVP Tax	Executive Vice President for Tax
GILTI	Global Intangible Low-Taxed Income: U.S. tax rule similar to Pillar Two rules
GloBE	Global Anti-Base Erosion
GRI	Global Reporting Initiative; "About this report" below provides more information
IAS/IFRS	International Accounting Standards / International Financial Reporting Standards
ICS	Internal Control System
IDW PS 980	Principles for properly auditing compliance management systems
LNG	Liquefied natural gas
OECD	Organization for Economic Cooperation and Development

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

Consumption taxes	Essentially electricity and energy taxes
Corporate income taxes	Current taxes on income and earnings
Covered Taxes	Individual Group units' actual tax expense/income for the financial year, to be calculated in accordance with Pillar Two rules
Digitalization@Tax	Program to digitalize Uniper's tax function
Employee contributions	Employee contributions, particularly to social insurance
Employer contributions	Employer contributions, particularly to social insurance
GloBE income	Net income or loss for a financial year adjusted for the items named in Pillar Two rules

List of Abbreviations, Glossary, and Additional Information

Jurisdictional blending	Aggregated calculation of taxes and income for all group in a jurisdiction or country
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)
OECD CbCR	Country-by-country reporting in accordance to OECD rules
Operating assets	Tangible fixed and inventories other than cash
Other property taxes	Taxes resulting from property
Overall tax rate	Total tax burden relative to earnings before taxes
Pillar Two	Global minimum taxation
Production taxes	Taxes resulting from production processes
Public CbCR	Directive that requires the publication of tax information in all EU member states
Safe harbors	Temporary simplifications for applying Pillar Two rules
Scope 1 and 2 / Scope 1 to 3 emissions	Scopes 1 to 3 of greenhouse gas emissions pursuant to the Greenhouse Gas Protocol; see: https://ghgprotocol.org
Social security contributions	Employer and employee social security contributions
Top-up tax	Supplementary tax for each tax jurisdiction calculated pursuant to Pillar Two using GloBE rules

Uniper Group Tax Guidelines	Uniper Group tax guidelines and regulations
Uniper. The beating heart of energy.	https://www.uniper.energy/news/uniper-the-beating-heart-of-energy
Whistleblowing process	Process for reporting possible compliance violations

Historie Fokusthema

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
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

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. This report refers to 2023 and contains no statements about events that occurred after December 31, 2023.

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