



TAX  
TRANSPARENCY  
REPORT 2022



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## Mundys S.p.A.

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Piazza di San Silvestro 8, 00187 Rome

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Piazza Armando Diaz 2, 20123 Milan

# 1. INTRODUCTION

## Our vision of taxation as an ESG key contributor

With the aim of fully integrating the distinguishing features of **sustainable enterprise**, Mundys S.p.A. ("Mundys") has adopted a Tax Strategy inspired by a vision of **taxation** as an **ESG key element**.

This **approach** is inspired by the strong belief that:



taxes make a key contribution to achieve needs of the communities in which the Group operates (the "**S**" in **Social**)



tax compliance and tax risk monitoring are the cornerstone of good corporate governance and, as such, comprise one of the minimum safeguards the Group seeks to ensure in order to qualify as being sustainable (the "**G**" in **Governance**)

To give substance to and implement this approach, since 2018, Mundys:



has set out in the **Tax Strategy** the objective to ensure compliance with the spirit of tax legislation



has adopted a **Tax Control Framework** (TCF), compliant with OECD guidelines



has facilitated a transparent and cooperative approach towards the Tax Authority (i.e. by participating in Italian cooperative compliance regime)



Mundys' firm belief in operating ethically and our focus on tax management and risk control, as well as our commitment to deal transparently with tax authorities, have enabled the Company to obtain **Fair Tax Mark** certification from the Fair Tax Foundation.

TAX STRATEGY

TAX CONTROL FRAMEWORK



COOPERATIVE COMPLIANCE

TAX REPORTING

## Disclosure of our approach to taxation

**2022** was an eventful year for Mundys, which in addition to the change of controlling shareholders, also saw the Group exit the stock market.

Notwithstanding the **Group** deems it vital to continue along the **tax transparency path** it embarked upon since 2020, with the first application in the Integrated Annual Report of **GRI-207 international standard**.

This path moves along two lines:



### TAX RISK MANAGEMENT

Provide evidence of how the Tax Strategy has been implemented, ensuring adequate processes for tax compliance and tax risk mitigation

### TRANSPARENCY

Disclosing information on the contribution through taxes paid and collected to the communities where Mundys operates.



### STAKEHOLDERS ENGAGEMENT

- Tax Authority
- Communities
- Partners
- Investors
- Employees



#### Engage Board of Directors

- Tax Strategy
- Policies and procedures
- Tax Control Framework Annual Report



#### Define the Tax Strategy

- Tax Strategy approved by the BoD in 2018 and revised in 2023



#### Establish processes and procedures

- Tax Control Framework Monitoring
- Tax Compliance Model
- Interpretative Tax Risk Management Policy



#### Establish a reporting framework

- GRI 207
- Tax Transparency Report

# 2. MUNDYS GROUP OVERVIEW

Mundys group is present in 29 countries and operates in the sectors of **motorway** and **airport concessions** and **mobility services**.



## MOTORWAYS

France, Brazil, Spain, Italy, Chile, Mexico, Argentina, India, Puerto Rico, Poland, United States

**9,125**

Km

**44**

Concessions

abertis



los lagos



## AIRPORTS

France, Italy

**5**

Airports

Aeroporti di Roma



## MOBILITY SERVICES

Australia, Austria, Belgium, China, Colombia, France, Germany, Greece, Hong Kong, England, Italy, Netherlands, Poland, Portugal, Czech Republic, Serbia, Singapore, Slovakia, Spain, United States, Swiss, Turkey, Hungary

**~9.6 Millions**

On-board units

**600 cities**

in 4 continents

Telepass

YUNEX TRAFFIC

(data as at 31 December 2022)

## Toll roads

### ABERTIS

Abertis group managed 32 concessions with responsibility for the development, maintenance and operation of toll motorways, operating approximately 7,625 km of motorway in Europe (France, Spain and Italy), America (Chile, Mexico, Brazil, the United States, Puerto Rico and Argentina) and India.

### OTHER MOTORWAYS

This segment includes 12 holders of concessions for the construction, operation and maintenance of toll motorways in Brazil, Chile and Poland, covering a total network of approximately 1,500 km.

## Airports

### AEROPORTI DI ROMA

The group includes Aeroporti di Roma (ADR) and its subsidiaries that operate within the Roman airport system, consisting of “Leonardo da Vinci” international airport located in Fiumicino and “Giovan Battista Pastine” airport located in Ciampino.

ADR is the number one airport operator in Italy by number of passengers and the seventh biggest in Europe.

### AÉROPORTS DE LA CÔTE D’AZUR

The airports segment includes *Aéroports de la Côte d’Azur (ACA)* and its subsidiaries, whose main activity is the management of three airports in France: *Nice Côte d’Azur airport, Cannes – Mandelieu airport* and *Saint-Tropez – La Môle airport*. The ACA group is France’s second most important airport hub.

## Mobility services

### TELEPASS

Telepass group provides sustainable, integrated mobility services. Specifically, Telepass is responsible for operating electronic tolling systems in Italy and 13 European countries and transport-related payment systems (car parks, restricted traffic zones, vehicle tracking systems, etc.), and provides digital mobility, insurance services and roadside assistance. Telepass has distributed approximately 9.6 million onboard units to customers and has approximately 831 thousand Telepass Pay customers.

### YUNEX TRAFFIC

On 30 June 2022, Mundys acquired Yunex Traffic, a global leader in the innovative Intelligent Transport Systems (ITS) sector, from the Siemens group. Yunex Traffic’s traffic management and urban mobility infrastructure and platforms are used in over 600 cities and on 4 continents (Europe, the Americas, Asia and Oceania).

# 3. TAX REPORTING

Since 2021, the Group adopted a tax reporting framework which provides for:



Details of Total Tax Contribution (taxes borne and taxes collected) in the countries in which our business is run



Details of revenues, profit before tax, income tax accrued and paid in line with the GRI's 207 Country By Country reporting

During 2022, on the path towards greater transparency we enriched the reporting framework with the following further information:



Total Tax Contribution benchmark (2022 vs 2021)



Total Tax Contribution by business segment



Total Tax Contribution sheet dedicated to the main jurisdictions

Mundys reporting framework provides a clear and immediate insight into our tax approach and the role it plays in the economic and social environment.

This highlights one again social responsibility and reputation Group approach in the different jurisdictions where it operates, leveraging tax purpose as a key element in the transition to a fairer and more sustainable future.

## 3.1. TOTAL TAX CONTRIBUTION

### 3.1.1. Group's Total Tax Contribution

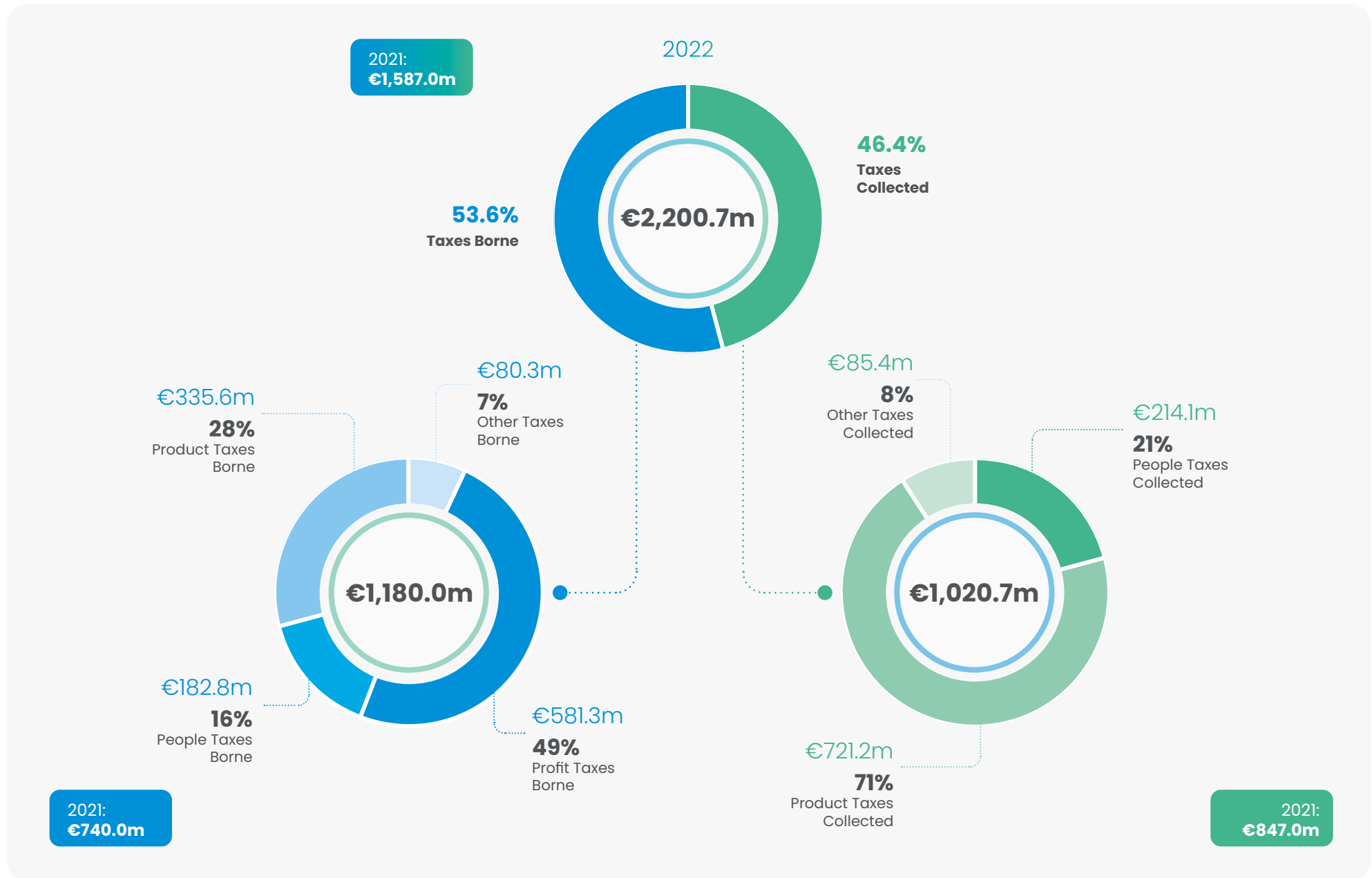
In line with international standards for tax transparency, taxes paid by Mundys are classified as **taxes borne** and **taxes collected** to highlight the importance of the Group's role as both tax contributor (taxes borne), and as collector of taxes on behalf of governments (taxes collected).

Taxes borne or collected fall into the following four categories:

	<b>Profit Taxes</b>	Corporate income taxes (including withholding taxes)
	<b>People Taxes</b>	Labour taxes and social security contributions
	<b>Product Taxes</b>	Indirect taxes on the production, sale or use/consumption of goods and services
	<b>Other Taxes</b>	Taxes not included in the previous categories





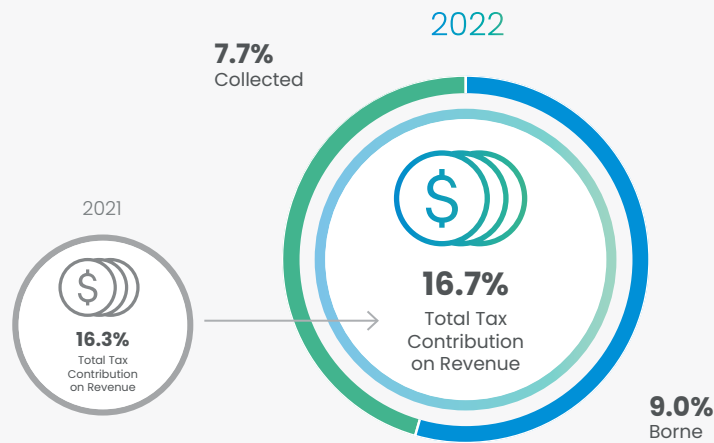


### 3.1.2. Key indicators of the Group's tax contribution

#### TOTAL TAX CONTRIBUTION ON REVENUE

##### Total Tax Contribution as a percentage of Revenue

For every **€100 of Revenue** generated by Mundys in 2022, total taxes of **€16.7 were paid**, including **€9.0 in taxes borne** and **€7.7 in taxes collected**.

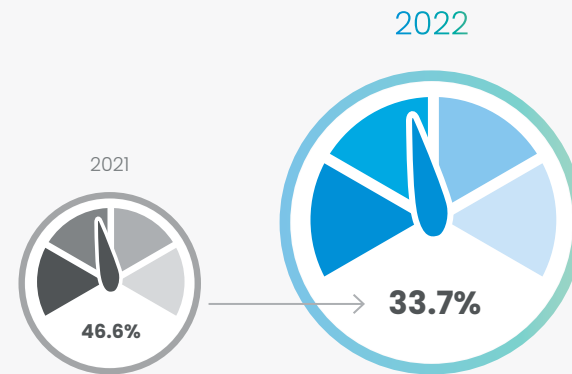


The **Total Tax Contribution as a percentage of Revenue** in 2022 is in line with the 2021 figure and reflects business trends, which saw an increase in both **levels of revenue and tax contribution** (especially with respect to taxes borne).

#### TOTAL TAX RATE

##### Taxes borne as a percentage of profit before taxes borne

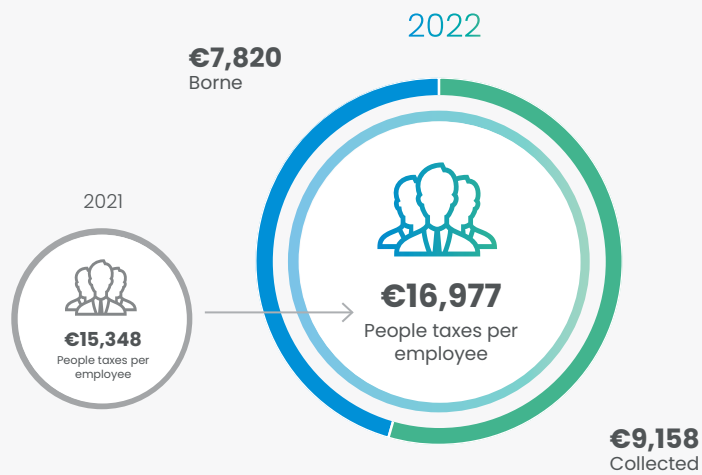
The total tax rate provides a measure of the tax charge for all the taxes borne by Mundys and calculated as a percentage of the taxes borne and paid compared with profit before tax. For every **€100 of Mundys' profit before taxes borne**, taxes borne of **€33.7 were paid**.



The **total tax rate in 2022**, despite a significant increase in taxes borne, is affected by the **participation exemption** related to the sale of Autostrade per l'Italia, amounting to **€2,809 million**.

## PEOPLE TAXES PER EMPLOYEE

For every person employed, Mundys paid **€16,977** in **people taxes**, including **€7,820** in people **taxes borne** and **€9,158** in people **taxes collected**.

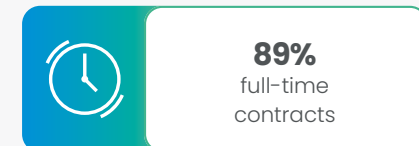
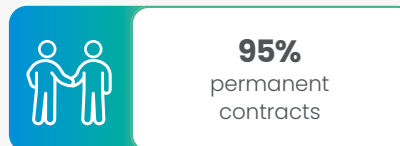


The **value of people taxes per employee** in 2022 is up slightly on the 2021 figure.

## DISTRIBUTION OF TOTAL WORKFORCE BY COUNTRY

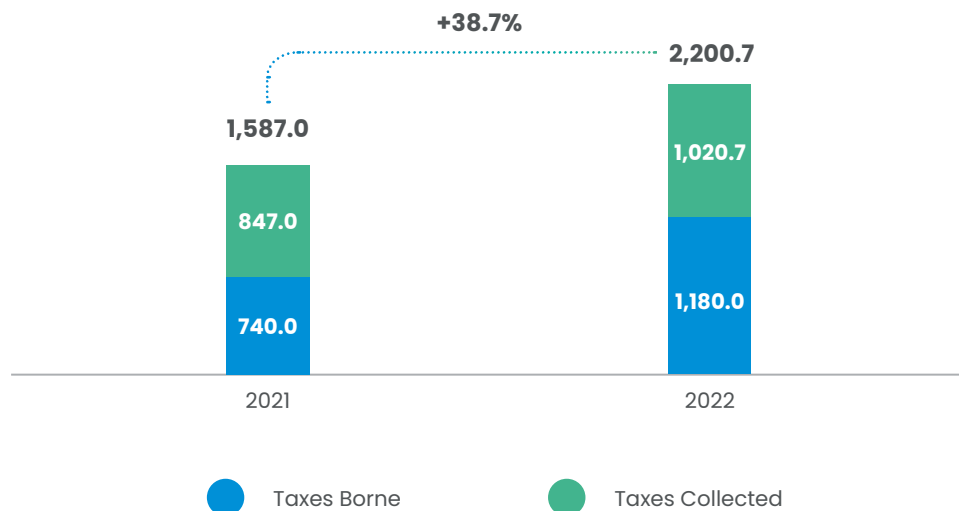


Over **23,000 employees** in **29 Countries**



### 3.1.3. The trend of the Group's tax contribution between 2022 and 2021

2022 saw a significant increase in the Total Tax Contribution amounting to **€613.7 million (up 38.7%)** compared to 2021.



Tax contribution break down growth as follows:



an **increase in profit taxes** (an increase of approximately €371.7 million corresponding to up 177.4%) due to the improved economic performance in the post-pandemic period and extraordinary reimbursements received in 2021 due to overpayments related to the contraction of business during the pandemic period



an **increase in people taxes** (an increase of approximately €83.9 million corresponding to up 26.8%), reflecting higher wages, salaries and social security contributions essentially related to Yunex acquisition, and progressive withdrawal from job support schemes, compensated by decrease of employees in Spain due to concessions termination



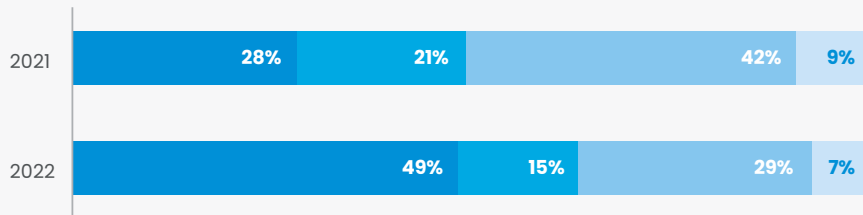
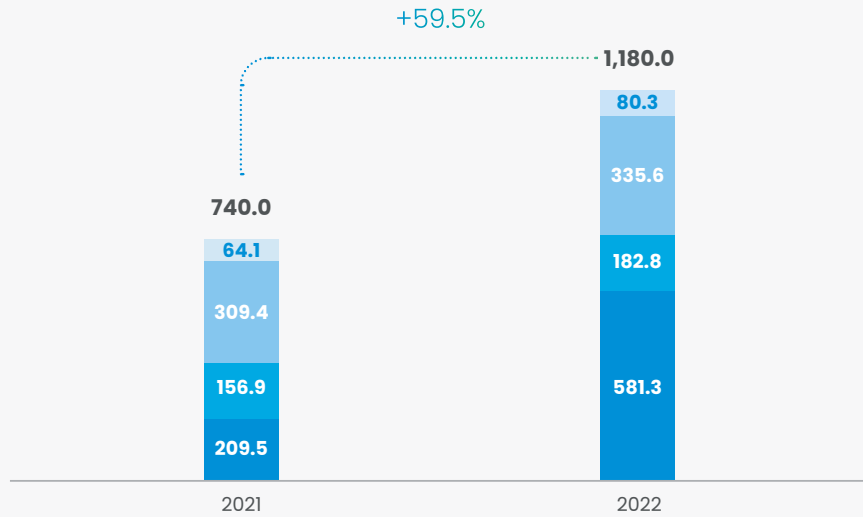
a significant **increase in product taxes** (of approximately €87.3 million corresponding to up 9.0%) and **other taxes** (of approximately €70.8 million corresponding to up 74.5%), mainly as a result of higher revenues deriving primarily from the recovery of motorway and airport concession traffic

The overall upturn in the Group's tax contribution, which has affected both **taxes borne** and **taxes collected**, albeit to varying degrees, reflects i) the performance of the transport and airport segments, which made good progress in recovering pre-pandemic traffic levels in 2022, and ii) the entry of Yunex into the Mundys Group from the second half of the year.



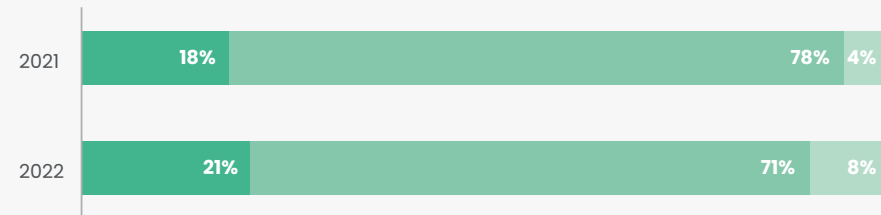
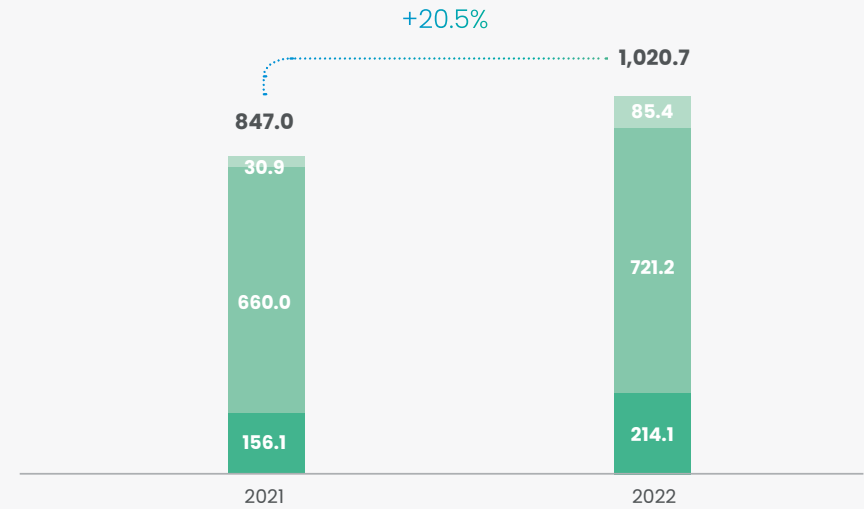
### 3.1.4. Taxes borne and taxes collected

#### TAXES BORNE



- Profit Taxes Borne
- People Taxes Borne
- Product Taxes Borne
- Other Taxes Borne

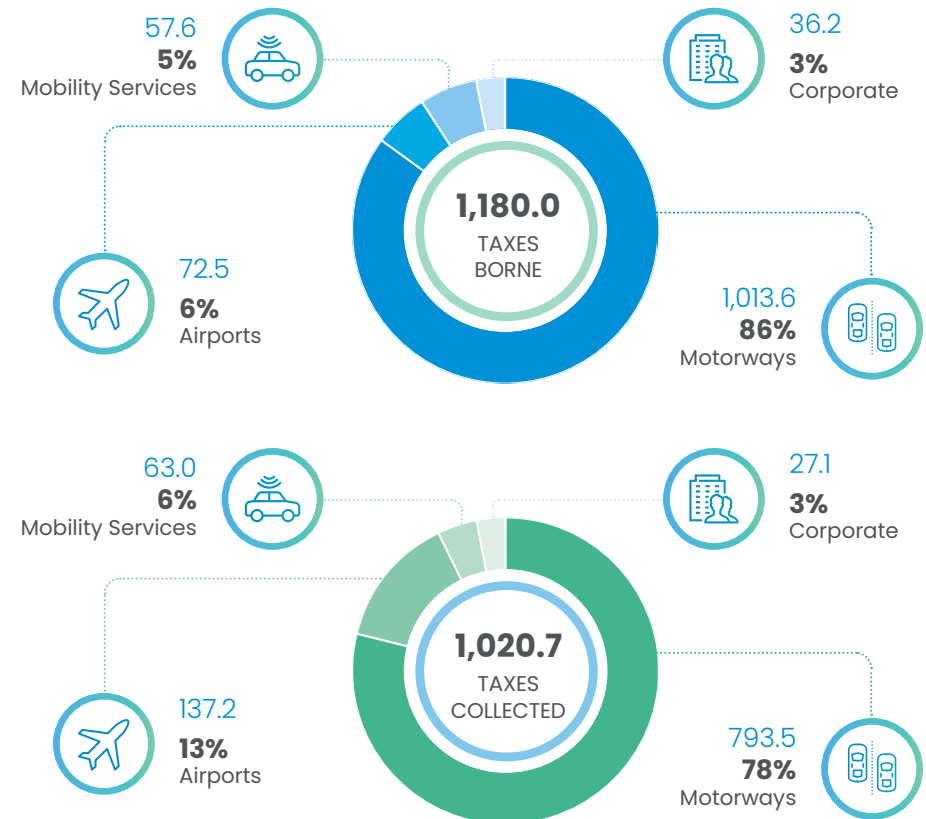
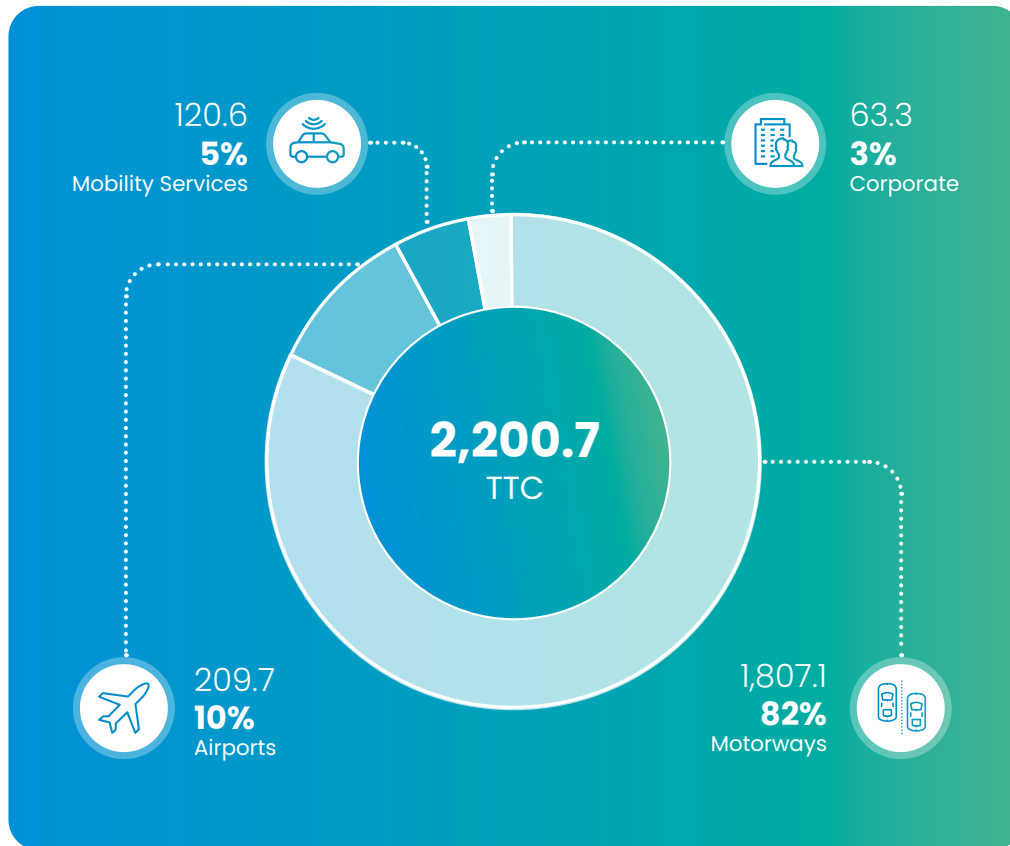
#### TAXES COLLECTED



- People Taxes Collected
- Product Taxes Collected
- Other Taxes Collected

### 3.1.5 The Total Tax Contribution by business segment




2022 Business Segment Total Tax Contribution sees **Motorway** activities sharing approximately **82%** of the Group. **Airport** activities and those relating to **Mobility Services** represent **10%** and **5%** respectively. The remaining **3%** refers to the tax contribution made by Mundys (**Corporate** activities).



Business segments contribute to Taxes Borne and Taxes Collected in a consistent manner. The greater weight of Taxes Collected in Airport segment compared to Tax Borne is mainly due to the presence of specific taxes on passenger boarding fees and on noise emissions.

Comparison between 2022 and 2021 shows - albeit to different extents - a significant increase for each business segment contribution in which the Group operates.

The Total Tax Contribution growth for each operating segment is due to an increase in both Taxes Borne and Taxes Collected:

BUSINESS SEGMENT	2021	2022	DELTA 2021-2022	DELTA % 2021-2022
	1,372.8	1,807.1	434.3	31.6%
	129.8	209.7	79.9	61.5%
	56.3	120.6	64.3	114.3%
	28.1	63.3	35.2	125.7%
<b>TOTAL</b>	<b>1,587.0</b>	<b>2,200.7</b>	<b>613.7</b>	<b>38.7%</b>



In relation to **Motorway** activities, due to higher motorway traffic and mainly associated with higher profit taxes



In relation to **Airport** activities, due to the higher airport traffic and mainly connected to the increase in surcharges on passenger boarding fees and taxes on emissions



In the **Mobility** segment, mainly due to 2022 Yunex acquisition

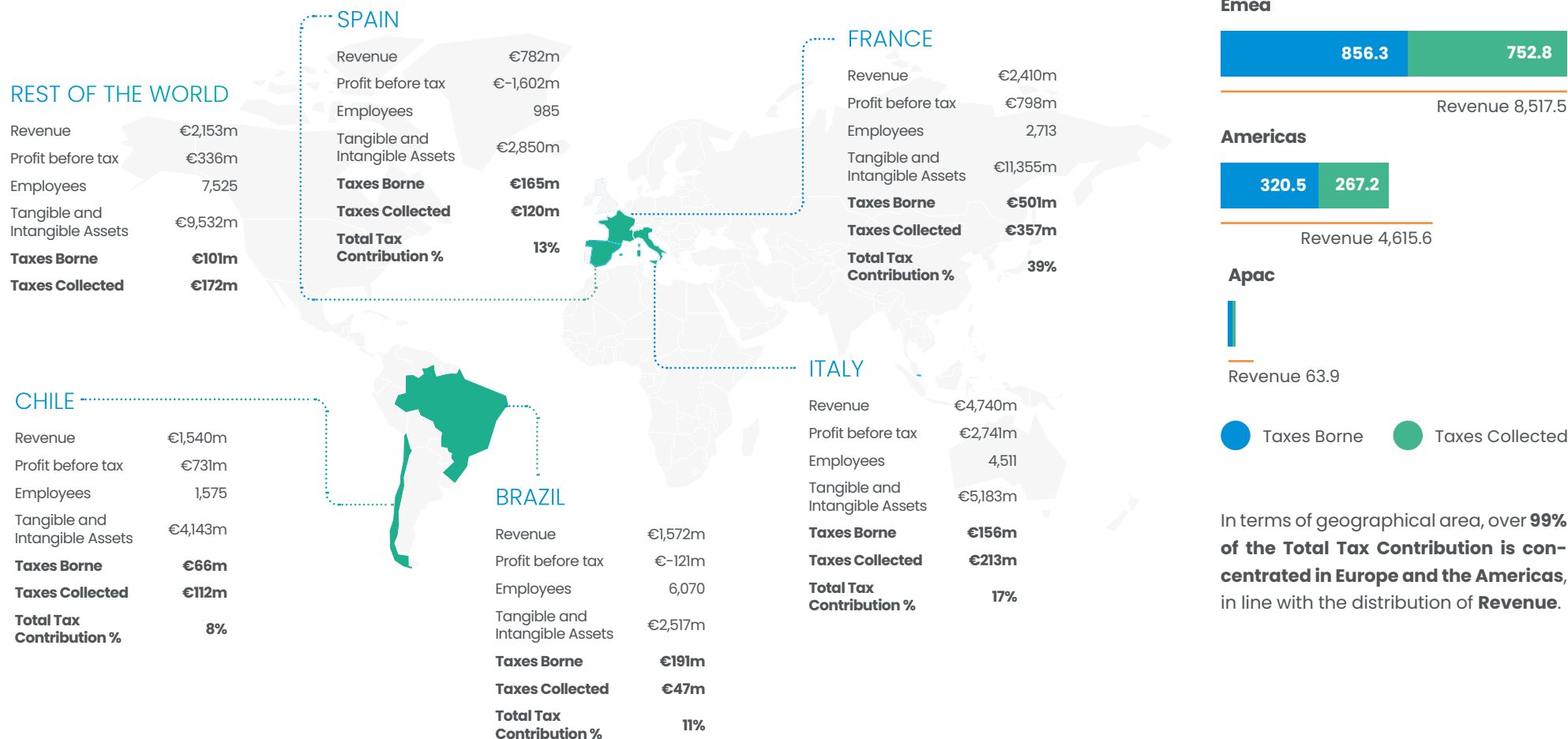


In relation to **Corporate** activities, mainly due to the higher non-deductible VAT, higher taxes on labor and taxes on dividends

### 3.1.6. The Total Tax Contribution by geographical area

The Total Tax Contribution is primarily concentrated in **France, Spain, Italy, Brazil and Chile**, in line with the distribution of Revenue, Employees and Tangible and Intangible Assets.

These five countries, which account for a Total Tax Contribution of **€1,927.9 million**, equal to around **90%** of the Group's Total Tax Contribution, represent over 85% of the Group's Revenue, 70% of total employees and of Tangible and Intangible Assets.

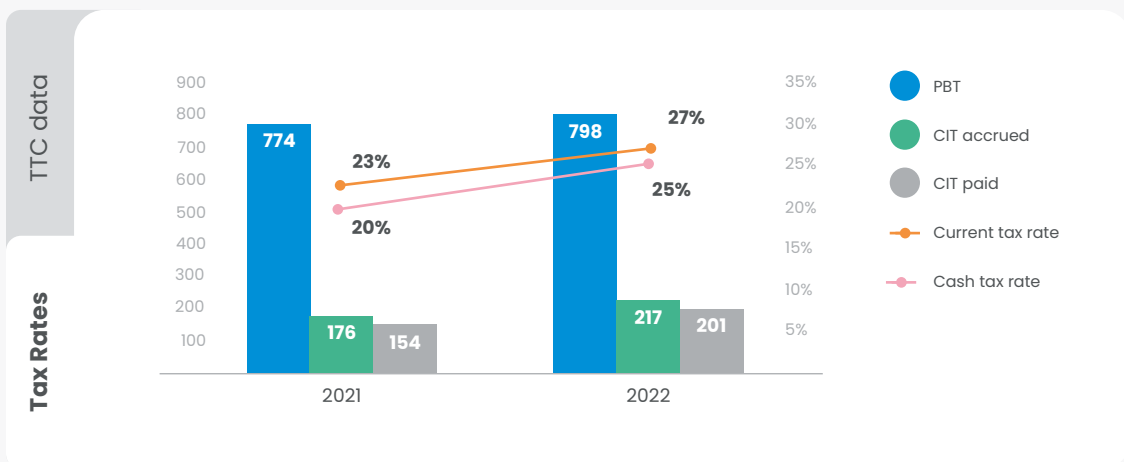


In terms of geographical area, over **99%** of the Total Tax Contribution is concentrated in Europe and the Americas, in line with the distribution of Revenue.

Total Tax Contribution %" represents the weight of country's TTC on the Group's TTC

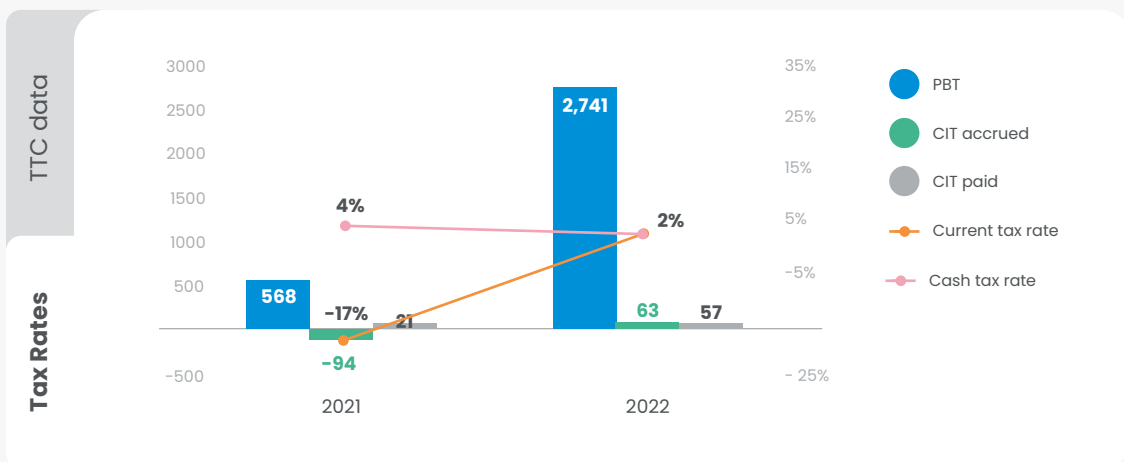


# 3.2 MAIN COUNTRIES



**Group's tax contribution in France amounted to €858.0 million, up €140.4 million compared to 2021 due to an increase of:**

- i. profit taxes borne (up €47.1 million), as a result of the steady recovery of performance in the post-pandemic period
- ii. product taxes borne (up €21.3 million) and collected (up €40.2 million), both related to higher motorway and airport traffic revenue



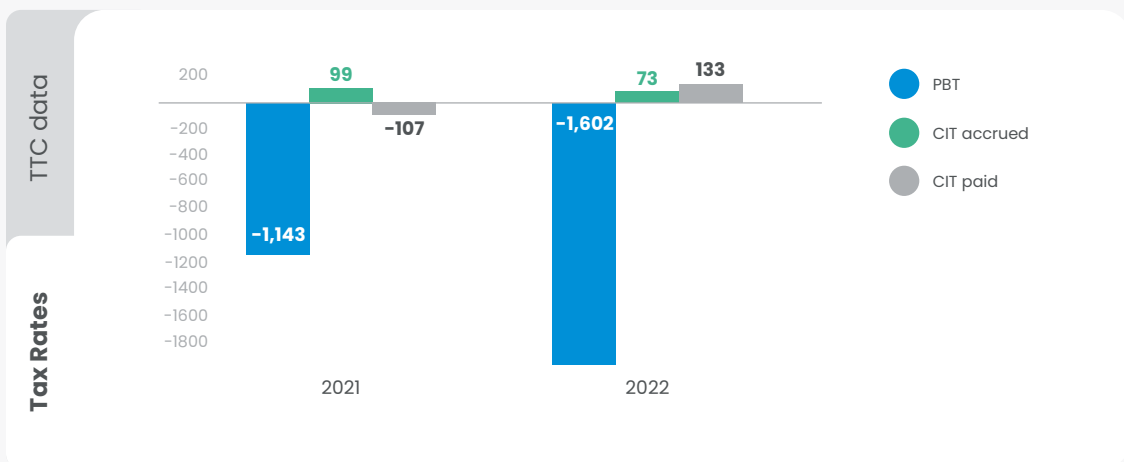
**Group's tax contribution in Italy amounted to €368.4 million, up €138.9 million compared to 2021, due to an increase of:**

- profit taxes borne (up €38.1 million) following the steady recovery of economic performance in the post-pandemic period
- people taxes borne (up €11.0 million) and collected (up €14.1 million), in line with increases in the number of employees and in wages and salaries
- product taxes borne (up €7.8 million) and collected (up €13.0 million), the latter in relation to higher motorway and airport traffic revenues
- other taxes collected also posted significant growth (up €56.9 million), in relation to increased airport traffic

**2022 Total Tax Rate is significantly affected by Autostrade per l'Italia disposal capital gain, amounting to EUR 2,809 million, which is almost totally exempt for tax purposes.**



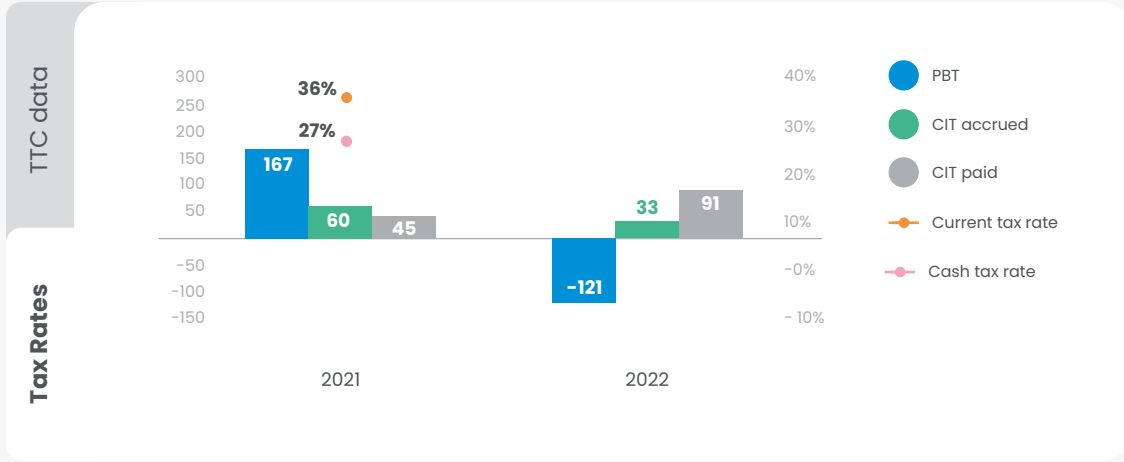
# SPAIN



**Group's tax contribution in Spain amounted to €285.5 million, up €119.3 million, reflecting the combined effect of:**

- an increase in profit tax (up €252.6 million) due to (i) non-recurring tax refund by Abertis group in 2021 (approx. €140 million) (ii) higher final tax payments
- a decrease in people taxes collected (down €2.5 million) due to the termination of Acesa and Invicat motorway concessions
- a reduction in products and services taxes collected (down €68.0 million) as a result of the expiry of motorway concessions
- a reduction in product taxes borne (down €43.8 million) due to extra payment done in 2021 (restatement of non-deductable VAT related to previous years)

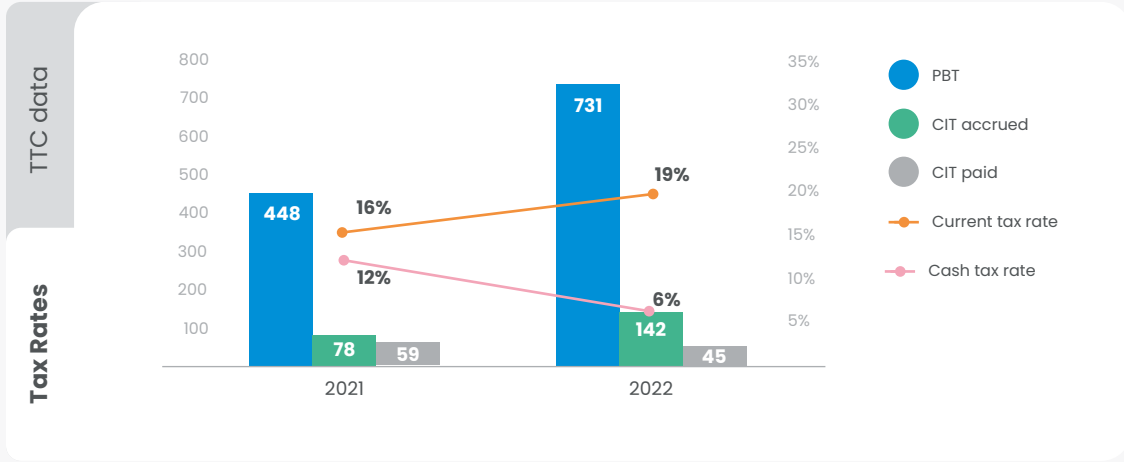
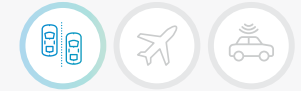
**With negative Profit Before Taxes, the Current (Income) Tax Rate, the Cash (Income) Tax Rate and the Total Tax Rate cannot be calculated.**



**Group's tax contribution in Brazil amounted to €237.4 million, up €78.8 million, due to an increase of:**

- i. profit taxes borne (up €31.3 million) as a result of the steady overall recovery in economic performance in the post-pandemic period and higher financial income on loans receivable at variable rates - which rose in line with the upturn in interest rates in the local Brazilian market
- ii. people taxes borne (up €5.8 million) and collected (up €12.4 million), due to higher wages and salaries
- iii. product taxes borne (up €23.4 million), due to higher motorway traffic revenue

**With negative Profit Before Taxes, the Current (Income) Tax Rate, the Cash (Income) Tax Rate and the Total Tax Rate cannot be calculated.**



**Group's tax contribution in Chile amounted to €178.2 million, up €17.8 million, reflecting the combined effect of:**

- i. an increase in product taxes borne (up €12.0 million) and collected (up €19.0 million), which in both cases related to higher motorway traffic revenues
- ii. a reduction in profit taxes (down €13.9 million) as a result of:
  - a. profit before tax includes positive item that will be tax on a cash basis
  - b. no tax advance payments by concession companies expired during 2022 (Autopista del Sol and Elqui)
  - c. previous year tax credit used to offset 2022 tax payments

# 4. TAX STRATEGY

The Tax Strategy defines the objectives and principles Mundys has adopted to manage its own and the Group's taxation. It expresses the **Board of Directors'** desire to ensure responsible tax management, in the context of the governance inspired by the values set out in the **Code of Ethics**.

The **responsible management** prescribed by the Tax Strategy entails:

- policy, guidelines, processes and procedures, which enable identification, measurement and mitigation of **tax compliance risks**
- proactive discussion with the Tax Authority, on **interpretative tax risks**, including in the context of the **cooperative compliance** regime
- the diffusion of its **values** and **guidelines** in the countries where the Group operates

**mundys**

abertis

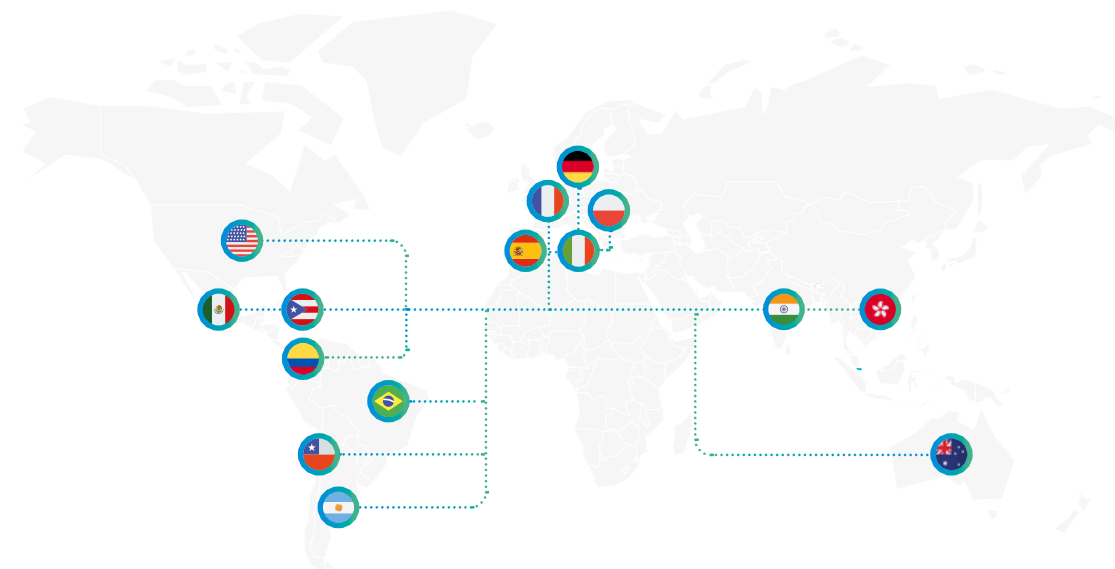
Aeroporti di Roma

Telepass

YUNEX TRAFFIC

spea ENGINEERING

Azzurra Aeroporti Sp.A.



## 4.1. TAX MANAGEMENT STRATEGIC GUIDELINES

Mundys Group’s Tax Strategy is grounded in the following tax principles, which reflect the core values on which is based the sustainable tax management Group commitment:

### Tax fairness

Ensure the payment of taxes due, within the legally prescribed deadlines, observing the spirit as well as the letter of the law and ensuring that, at the same time, the Group enjoys legitimate tax benefits

### Responsible tax governance

An approach to taxation respectful of different stakeholders engaged, and that guarantees the highest level of accountability and disclosure on the adequacy of tax strategy and risk processes adopted

### Tone at the top

The Board of Directors defines Mundys Group’s tax strategy and oversees its application, as well as the effectiveness of the Tax Control Framework safeguards



### Tax Authority engagement

The Group maintains a transparent relationship with the Tax Authority, including through cooperative compliance regime

### Tax whistleblowing

The whistleblower protection procedure also applies to conduct that may involve breaches of tax legislation

### Intercompany transactions

Mundys applies the arm’s length principle in determining the terms and conditions of intercompany transactions, in line with internationally recognised standards

To ensure effective implementation of the general principles outlined, Mundys' tax strategy applies the following **guidelines**:

### Tax Compliance

Commit to applying the tax rules provided for in treaties, EU regulations and laws of the jurisdictions in which the Group operates, ensuring compliance with both the letter and spirit of the tax laws.

Should the legislation give rise to significant tax uncertainties, Mundys shall adopt a reasonable interpretation to be disclosed in advance to the competent Tax Authority.

### Tax Fairness

Ensure to pay the amount of taxes due according to the law and at the right time, without necessarily choosing to pay the highest amount. Therefore, Mundys is committed:

- towards the affected communities in which the Group operates to pay taxes as significant source of government revenue to their sustainable developments.
- towards its stakeholders, not to pay more taxes than is due under the law, ensuring in any event that it takes advantages of any legitimate tax savings and permitted tax benefits.

### Tax risk Management

Adopt a Tax Control Framework, for tax risks management, continuously updated and in line with OECD recommendations and the criteria adopted by the Italian Tax Authority, to monitor the risk of incurring the violation of tax regulations or the abuse of principles and purpose of the tax system.

Extend gradually the Tax Control Framework to the most relevant entities of the Group.

### Aggressive Tax Planning

Adopt an approach to taxation that excludes the use of artificial constructions and the localization of profits in tax havens with the sole purpose of obtaining undue tax advantages in contrast with the purposes or the spirit of the provisions or of the relevant tax system.

Monitor tax compliance with the key principles established in the Tax Strategy.

Declare and remit taxes in the jurisdictions in which the Group has economic substance and carries out its effective economic activity.

### Arm's length principle

Apply the arm's length principle for setting intercompany transactions in accordance with the OECD guidelines (Model Tax Convention and Transfer Pricing Guidelines).

### Tax Authority engagement

Ensure transparency and accuracy in relations with Tax Authorities, promoting adherence to co-operative compliance regimes for Group companies, that integrate the requirements set by the relevant domestic regulations and adhering to the provisions on the transfer pricing documentation.

### Tax Reporting and Sustainability

Considering that tax matters fall under sustainability impacts, risks, and opportunities, present an annual publicly available Tax Transparency Report that provides investors with information to evaluate the adequacy of the established Tax Strategy, tax risk management processes implemented and the tax contribution to the jurisdictions where the Group operates (both in terms of taxes paid – Taxes Borne – and in terms of taxes collected – Taxes Collected).

### Whistleblowing

Fully implement a global whistleblowing procedure, which provides anonymous channels for reporting any unlawful or justifiably suspicious conduct, including in tax matters, as well as for communicating any tax findings. Set up a special committee for the analysis and management of whistleblowing reports, with protections for the whistleblower and compliance with national and EU regulations.

### Soft Controls

Encourage tax compliance culture and awareness of the value of compliance in the Group.

There must be no management incentive schemes linked to undue reductions in the tax burden.



## 4.2. TAX STRATEGY FROM DESIGN TO IMPLEMENTATION

Mundys has progressively implemented specific tools to track and monitor the effective **implementation** of the strategic guidelines set out in the Tax Strategy, which is reported to the Board of Directors in the annual report.

In particular, with regard to the goal of refraining from aggressive tax planning, Mundys has invested heavily in **technology** throughout the Group in order to adopt advanced digital solutions.

In this way, the Parent Company's Tax Affairs unit is guaranteed control over the effective tax rates of overseas subsidiaries, in application of Italian laws governing controlled foreign companies – and with an eye on the future, of further requirements, such as those that will result from the OECD's Global Minimum Tax rules – and the ability to gather the country-by-country data required by domestic and international laws on transfer pricing.

Critical analysis of the data and information obtained enables Tax Affairs to constantly monitor the location of Group entities. This is partly to ensure, where investment has taken place in a low-tax jurisdiction, that the related presence is solely linked to specific local business purposes (economic substance).



## 4.3. A GROUP SYMPHONY ON TAXATION

In full harmony with Mundys strategic objectives on taxation, **Abertis**:



assigns the Board of Directors the responsibility for adopting the **Fiscal Strategy** in line with the Mundys's principles and monitoring its concrete implementation



adopts a risk management model, including **fiscal risks**, approved and monitored by the **Audit, Control and Sustainability Committee**



adheres to the **Código de Buenas Prácticas Tributarias**, a framework of evolved tax authority/taxpayer relations, jointly developed in Spain by the Tax Authority and the Forum of Large Enterprises



publishes, as part of its annual financial reporting, a **section on fiscal reporting**, describing its strategy, governance model and the ways in which it communicates with and involves stakeholders, as well as the contribution the group makes to the communities in which it operates through the publication of CbCR and Total Tax Contribution information



*Photo on the right: Conductor Vanessa Benelli Mosell conducts the young orchestra of the Accademia di Santa Cecilia during the concert held on 16 March 2023 at Fiumicino airport in Rome for the launch of the Mundys brand*

# 5. TAX GOVERNANCE, CONTROL AND RISK MANAGEMENT

## 5.1. TAX GOVERNANCE

Mundys developed Group Tax Governance rules, defining the **roles and responsibilities** involved in managing the Company's and the Group's taxation and implementing appropriate controls to ensure ongoing compliance with the principles contained in the Tax Strategy in the jurisdictions in which the Group operates.

Mundys **Board of Directors** has approved the Tax Governance Framework, thus ensuring that there is adequate commitment to promoting a culture of tax compliance and the related values at all levels of the organisation.

The Tax Governance Framework implemented by Mundys guarantees ongoing management of tax risk based on the **3 lines of defence** model. The Tax Risk Officer prepares an annual **Tax Control Framework Report**, which provides information on the outcomes of the control activities carried out. The Report is described to the Audit, Risk and Sustainability Committee, the Board of Directors. In the annual report to Mundys Board of Directors, significant critical issues arising at subsidiaries that may expose the Group to significant tax risks or go against the Tax Strategy are highlighted.

### The 3 lines of control



#### RISK OWNER (I LEVEL)

The **tax unit** and other line functions involved in various ways in the Tax Control Framework (risk owners) are responsible for first-level controls



#### TAX RISK OFFICER (II LEVEL)

The **Tax Risk Officer** conducts second-level controls and is responsible for revising and monitoring the first-level controls implemented through the Tax Control Framework



#### INTERNAL AUDIT (III LEVEL)

**Internal Audit** carries out third-level controls of the entire Internal Control and Risk Management System, including the Tax Control Framework

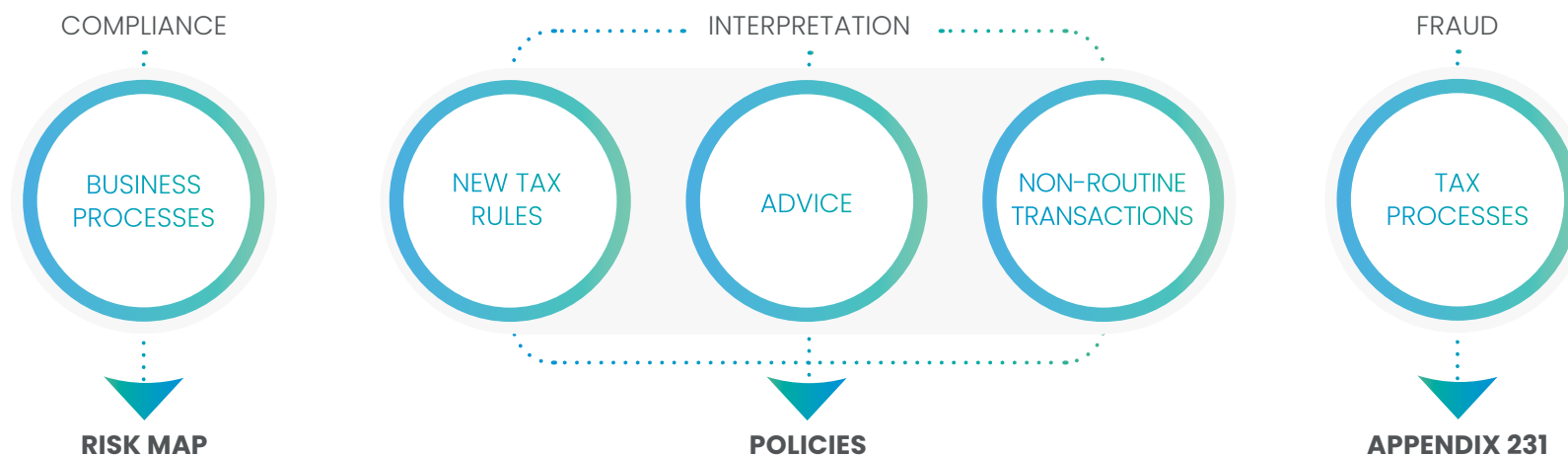
## 5.2. TAX CONTROL AND RISK MANAGEMENT

The Tax Control Framework ensures the correct definition of the tax variable in terms of three aspects:

- **compliance** risk – with the aim of guaranteeing correct compliance with tax regulations – monitored through risk/control maps, in which tax risks are appropriately associated with business processes and activities designed to mitigate such risks, including related quantitative assessments. In defining compliance risk controls, Mundys has invested in technology, adopting solutions for the digitalisation of tax processes, regarding the calculation of taxes and the preparation of key requirements, such as application of the Controlled Foreign Companies rule and the preparation of Country by Country reporting, in order to obtain greater assurance of the accuracy of data relevant for the Company’s and the Group’s tax compliance purposes in the different jurisdictions in which it operates. In addition, the Company has designed and formally adopted internal policies and procedures, with specific regard to transfer pricing and the Directive on Administrative Cooperation 6, defining principles, guidelines and appropriate controls to mitigate the related tax risk.

- the risk relating to the **interpretation** of tax legislation – with the aim of pursuing well-founded, certain solutions – involving timely identification, correct measurement and control by a specific internal procedure that, depending on the magnitude of risk, ensures the identification of cases of tax uncertainty and provides mechanisms for internal decision-making escalation with regard to assumption of the related risks, for prior discussion with the tax authorities and for reporting to the Board of Directors in the form of the specific Tax Control Framework Report. Mundys has implemented a process for managing uncertain tax positions that involves a specific technological solution that tracks and traces tax decision-making, as well as keeping historical records of risk positions relating to specific fiscal years and the choices made by the Company.
- In the Italian context, the Tax Control Framework has been further enhanced with measures to mitigate the risk of **tax fraud** by boosting interconnections with the Organisational, Management and Control Model, for the purposes of entities’ liability for tax offences, as enshrined in Legislative Decree 231 of 2001.

### Tax Risk



## 5.3. RELATIONSHIP WITH TAX AUTHORITY

Mundys Group carries on its business in all the jurisdictions in compliance with tax legislation and a transparency-based approach with tax authorities.

Furthermore, Mundys promotes adherence to **cooperative compliance** schemes, where provided for. Mundys and its main Italian subsidiaries are already cooperating and engage in **transparent** dialogue with the tax authorities to establish prior **certainty** with regard to particularly complex tax arrangements.

Since **2014**, Abertis has voluntarily adhered to the *Código de Buenas Prácticas Tributarias*. As part of this initiative, Abertis undertakes to comply with guiding principles aimed at:



promote mutual cooperation based on good faith and transparency of tax practices



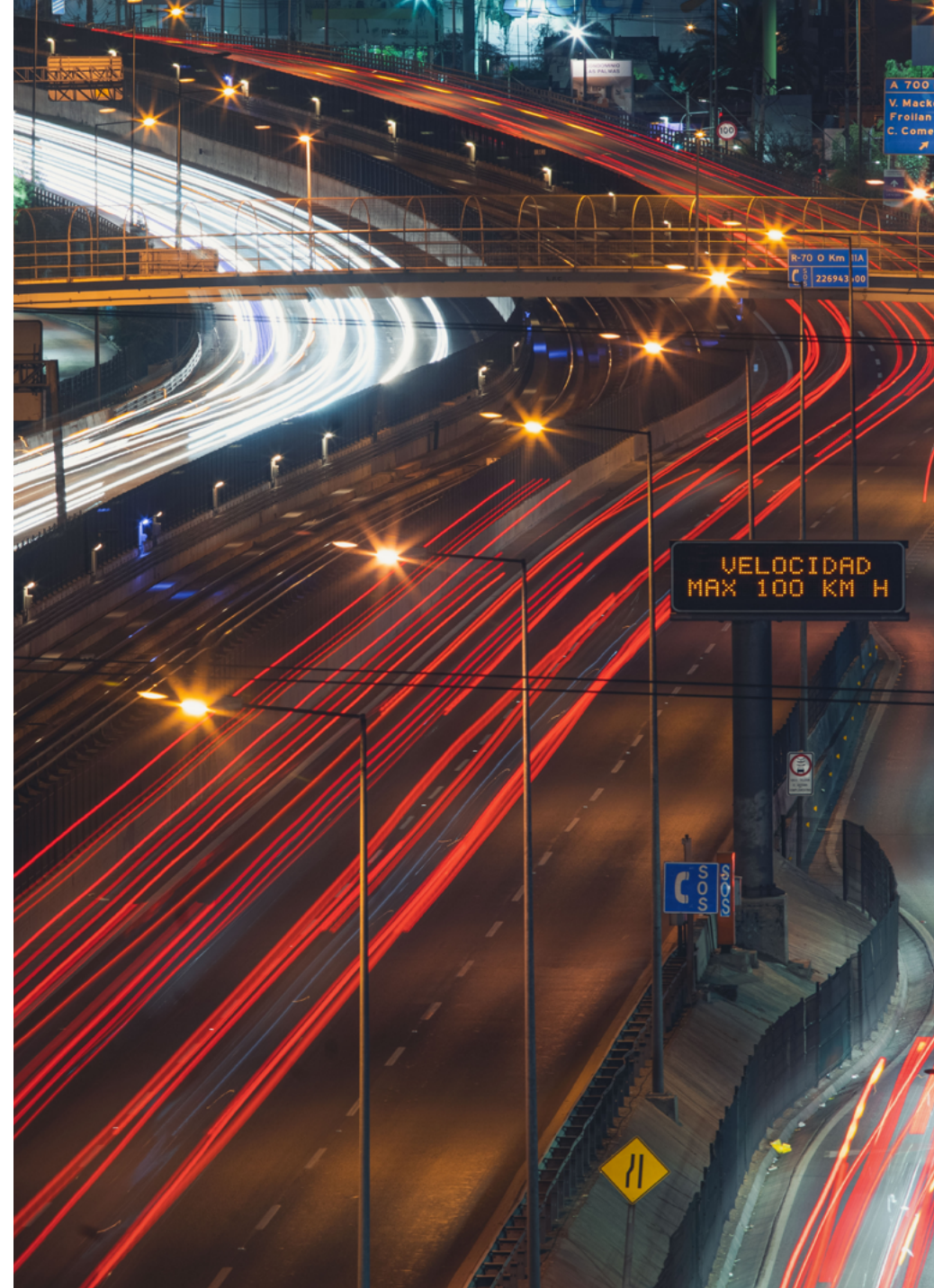
increase certainty in the application and interpretation of tax legislation



reduce tax disputes

Furthermore, on an annual basis Abertis voluntarily submits a **tax transparency report** to the Spanish tax authorities, in which it provides relevant tax information about its group.

For further information, please refer to the section of the **institutional website** available at the following link: <https://www.abertis.com/financial-information-fiscal-transparency/>



# 6. APPENDIX

## 6.1. GROUP KEY FIGURES

The scope of this Report includes all entities consolidated on a **line-by-line or proportional basis** in the context of Mundys' consolidated financial statements, in accordance with the relevant International Financial Reporting Standards (IFRS), with the exception of entities reclassified for the purposes of this report as discontinued operations in accordance with IFRS 5 (namely Autostrade per l'Italia - ASPI subgroup entities).

Reference should be made to Annex 1, "Scope of consolidation and shareholdings of the Mundys Group as at and for 31 December 2022" of the 2022 Integrated Annual Report (IAR), for information on entity names, principal activities and tax residence jurisdiction.

In this regard, it should be noted that, in line with the principles set out in Mundys' tax strategy, Group entities are incorporated in the jurisdictions in which they conduct their actual business, and their tax residence is always the same as their location, with neither the former nor the latter being guided by tax assessments.

KEY FIGURES	
Intangible assets (concession rights)	€34,723m
Tangible assets	€856m
Revenue	€13,197m
Profit before tax	€2,883m
Corporate income taxes accrued	€644m
Corporate income taxes paid	€567m
Taxes borne	€1,180m
Taxes collected	€1,021m
Employees	23,379

## 6.2 MAIN COUNTRIES KEY FIGURES

### France

	FY 2021	FY 2022	%
Entity	16	20	-
Revenue	€2,290m	€2,410m	+5%
Profit before tax	€774m	€798m	+3%
Corporate Income Tax accrued	€176m	€217m	+24%
Corporate Income Tax paid	€154m	€201m	+31%
Tangible and Intangible Assets	€10,740m	€11,355m	+6%
Employees	2,795	2,713	-3%

### Italy

	FY 2021	FY 2022	%
Entity	31	30	-
Revenue	€2,612m	€4,740m	+81%
Profit before tax	€568m	€2,741m	+382%
Corporate Income Tax accrued	-€94m	€63m	+167%
Corporate Income Tax paid	€21m	€57m	+166%
Tangible and Intangible Assets	€3,293m	€5,183m	+57%
Employees	4,062	4,511	+11%


**Spain**

	FY 2021	FY 2022	%
Entity	23	25	-
Revenue	€1,256m	€728m	-38%
Profit before tax	-€1,143m	-€1,602m	-40%
Corporate Income Tax accrued	€99m	€73m	-27%
Corporate Income Tax paid	-€107m	€133m	+224%
Tangible and Intangible Assets	€3,126m	€2,850m	-9%
Employees	1,305	985	-25%


**Brazil**

	FY 2021	FY 2022	%
Entity	22	22	-
Revenue	€1,057m	€1,572m	+49%
Profit before tax	€167m	-€121m	-178%
Corporate Income Tax accrued	€60m	€33m	-46%
Corporate Income Tax paid	€45m	€91m	+103%
Tangible and Intangible Assets	€1,889m	€2,517m	+33%
Employees	6,125	6,070	-1%


**Chile**

	FY 2021	FY 2022	%
Entity	23	24	-
Revenue	€1,169m	€1,540m	+32%
Profit before tax	€488m	€731m	+50%
Corporate Income Tax accrued	€78m	€142m	+81%
Corporate Income Tax paid	€59m	€45m	-24%
Tangible and Intangible Assets	€3,470m	€4,143m	19%
Employees	1,660	1,575	-5%

## 6.3. COUNTRY-BY-COUNTRY REPORTING

Tax jurisdiction (€m, except for the number of employees)	Third- party revenue	Revenue from intercompany transactions with other tax jurisdictions	Profit/(Loss) before tax	Corporate income taxes paid	Corporate income taxes accrued	Number of employees	Tangible assets	Stated capital	Accumulated earnings	Wages and salaries	Intangible assets (concession rights)
Argentina	402.2	-	22.8	3.0	-1.2	1,801.0	17.5	225.6	4.5	48.7	-
Australia	9.4	1.9	-0.2	0.1	-	65.0	3.5	26.7	-	2.3	-
Austria	21.0	5.0	4.8	1.6	0.3	138.0	4.2	0.0	-	5.4	-
Belgium	6.1	-	0.0	-	-	56.0	3.7	1.3	-	2.1	-
Brazil	1,571.8	-	-121.1	90.9	111.8	6,070.0	50.8	4,341.1	-997.5	45.3	2,466.0
Bulgaria	0.2	-	-0.0	0.0	-	5.0	0.0	-	-	0.1	-
Canada	1.0	0.4	0.1	0.0	0.0	9.0	0.0	-	-0.1	0.6	-
Chile	1,539.6	0.2	730.8	44.7	141.5	1,575.0	43.4	1,439.2	625.4	31.6	4,099.7
China	4.8	0.2	0.8	-	-0.0	31.0	2.5	7.1	-	0.8	-
Colombia	3.0	0.1	-0.4	0.1	-	106.0	0.3	12.5	-	0.6	-
Croatia	1.1	2.8	0.2	0.1	0.0	55.0	0.3	0.3	0.7	1.7	-
Czech Republic	6.1	-	1.6	-	-	104.0	1.3	7.5	-	2.2	-
France	2,388.0	22.0	797.8	200.9	217.4	2,713.0	239.9	2,080.7	1,144.7	126.1	11,115.1
Georgia	-	-	0.1	-	-	-	-	-	-	-	-
Germany	106.8	3.7	25.2	-	-0.2	1,064.0	24.8	739.0	0.0	40.3	-
Greece	2.0	0.0	-0.0	0.1	-	16.0	0.6	4.2	-	0.3	-
Hong Kong	1.1	-	-2.5	-	-	25.0	0.3	3.5	-	0.9	-
Hungary	4.8	0.2	0.5	0.1	0.2	36.0	1.3	0.0	0.4	0.6	-
India	42.0	1.5	16.7	2.2	2.1	53.0	1.1	59.7	-9.8	1.2	96.2
Ireland	0.8	1.4	0.4	0.0	0.0	7.0	-	-	3.6	0.6	-
Italy	4,733.0	6.9	2,741.0	57.1	63.0	4,511.5	236.8	6,092.7	11,383.8	234.2	4,945.9
Luxembourg	2.0	-	0.6	-	0.0	-	0.1	674.9	0.7	-	-
Mexico	746.1	-	208.8	17.1	15.8	1,435.0	13.5	1,448.4	604.4	13.2	5,631.5
Netherlands	25.8	79.0	6.5	1.2	0.9	165.0	7.9	2.0	26.6	6.2	-



Tax jurisdiction (€m, except for the number of employees)	Third- party revenue	Revenue from intercompany transactions with other tax jurisdictions	Profit/(Loss) before tax	Corporate income taxes paid	Corporate income taxes accrued	Number of employees	Tangible assets	Stated capital	Accumulated earnings	Wages and salaries	Intangible assets (concession rights)
Poland	102.6	5.0	24.8	8.8	10.0	328.0	12.5	71.5	105.6	6.7	98.7
Portugal	5.4	0.0	0.0	0.0	0.0	64.0	0.6	1.1	0.0	1.1	-
Puerto Rico	187.5	0.0	46.3	4.4	8.1	98.0	36.3	309.8	9.8	4.5	1,317.4
Qatar	7.2	-	0.2	0.3	0.0	11.0	-	-	-	0.9	-
Republic of Serbia	2.5	0.0	0.4	-0.0	-0.1	14.0	0.2	0.4	-	0.2	-
Romania	-	-	-0.8	-	-	-	-	-	-	-	-
Singapore	2.1	0.8	-0.7	-	-	22.0	0.1	1.4	-	1.2	-
Slovakia	5.5	-0.5	0.1	-	-	40.0	0.3	4.8	-	0.7	-
Spain	725.6	56.4	-1,601.5	132.6	72.6	985.0	85.3	13,371.4	1,186.0	55.2	2,764.4
Sweden	1.3	-	0.1	0.0	-	-	-	-	-	-	-
Switzerland	16.8	0.8	-1.1	0.0	0.1	89.0	2.2	5.6	-0.8	4.7	-
Tunisia	-	-	-0.0	-	-	-	-	-	-	-	-
Turkey	1.7	-	-2.7	-	-	13.0	0.3	5.1	-	0.2	-
United Kingdom	133.9	34.8	3.6	1.4	1.5	1,246.0	49.0	202.7	9.3	32.4	-
United States	154.9	8.7	-19.9	0.0	0.0	429.0	15.3	2,015.3	64.0	28.8	2,188.6
<b>Total</b>	<b>12,966</b>	<b>231</b>	<b>2,883</b>	<b>567</b>	<b>644</b>	<b>23,379</b>	<b>856</b>	<b>33,156</b>	<b>14,161</b>	<b>702</b>	<b>34,723</b>

## 6.4. TOTAL TAX CONTRIBUTION BY TAX JURISDICTION 2022 – 2021

2022

Tax jurisdiction (€m)	Tax Borne					Tax Collected				Total Tax Contribution
	Profit Taxes	People Taxes	Product Taxes	Other Taxes	Total Taxes Borne	People Taxes	Product Taxes	Other Taxes	Total Taxes Collected	
<b>Americas</b>	<b>157.6</b>	<b>30.0</b>	<b>125.8</b>	<b>7.0</b>	<b>320.5</b>	<b>43.2</b>	<b>221.7</b>	<b>2.4</b>	<b>267.2</b>	<b>587.7</b>
Argentina	3.0	7.1	22.1	1.4	33.6	6.1	4.7	1.3	12.1	45.7
Brazil	88.4	15.5	85.7	1.3	191.1	22.7	24.0	-	46.7	237.7
Canada	0.0	0.0	0.1	0.0	0.2	0.3	-	-	0.3	0.5
Chile	44.5	1.5	17.7	2.3	66.1	5.5	105.8	0.9	112.2	178.2
Mexico	17.1	2.6	-	0.5	20.2	5.9	87.1	-	93.0	113.2
Puerto Rico	4.4	0.4	0.0	1.3	6.2	1.6	-	0.2	1.8	8.0
United States	0.0	2.7	0.1	0.2	3.1	1.1	0.1	0.0	1.2	4.3
<b>APAC</b>	<b>2.2</b>	<b>0.1</b>	<b>0.9</b>	<b>-</b>	<b>3.2</b>	<b>0.5</b>	<b>0.2</b>	<b>-</b>	<b>0.7</b>	<b>3.8</b>
India	2.2	0.1	0.9	-	3.2	0.5	0.2	-	0.7	3.8
<b>EMEA</b>	<b>421.5</b>	<b>152.7</b>	<b>208.8</b>	<b>73.3</b>	<b>856.3</b>	<b>170.4</b>	<b>499.3</b>	<b>83.1</b>	<b>752.8</b>	<b>1,609.1</b>
Austria	1.6	1.6	-	0.2	3.4	2.9	1.5	-	4.3	7.7
Croatia	0.1	0.8	0.0	0.0	0.9	0.0	-	-	0.0	0.9
France	203.0	62.9	188.9	46.4	501.3	39.5	316.2	1.0	356.7	858.0
Germany	-	5.8	-	0.2	6.0	17.5	4.6	-	22.1	28.1
Hungary	0.0	-	0.0	0.0	0.0	0.1	-	-	0.1	0.1
Ireland	0.0	-	0.6	-	0.6	0.3	-	-	0.3	0.9
Italy	59.3	63.9	26.3	6.0	155.6	76.1	57.1	79.6	212.8	368.4
Luxembourg	-	-	-	-	-	-	-	-	-	-
Netherlands	1.2	0.3	0.0	-	1.5	2.9	4.8	-	7.7	9.2
Poland	8.7	1.1	0.0	0.6	10.4	2.1	12.3	0.0	14.4	24.8
Portugal	0.0	0.1	-	0.0	0.2	0.2	-	0.0	0.2	0.4
Qatar	0.3	-	-	-	0.3	-	-	-	-	0.3
Spain	145.9	12.4	-12.5	19.5	165.4	22.0	95.7	2.4	120.1	285.5
Switzerland	0.0	0.2	0.0	0.0	0.3	0.1	-	-	0.1	0.4
United Kingdom	1.4	3.5	5.5	0.2	10.5	6.8	7.2	-	13.9	24.5
<b>Total</b>	<b>581.3</b>	<b>182.8</b>	<b>335.6</b>	<b>80.3</b>	<b>1,180.0</b>	<b>214.1</b>	<b>721.2</b>	<b>85.4</b>	<b>1,020.7</b>	<b>2,200.7</b>

2021

Tax jurisdiction (€m)	Tax Borne					Tax Collected				Total Tax Contribution
	Profit Taxes	People Taxes	Product Taxes	Other Taxes	Total Taxes Borne	People Taxes	Product Taxes	Other Taxes	Total Taxes Collected	
<b>Americas</b>	<b>128.2</b>	<b>21.2</b>	<b>82.9</b>	<b>5.5</b>	<b>237.9</b>	<b>26.8</b>	<b>165.5</b>	<b>3.4</b>	<b>195.7</b>	<b>433.6</b>
Argentina	3.3	6.9	18.0	1.6	29.8	5.7	4.6	1.1	11.4	41.2
Brazil	57.2	9.8	62.4	0.1	129.4	10.3	19.1	0.1	29.5	158.9
Canada	0.0	0.0	0.2	0.0	0.2	0.2	-	-	0.2	0.4
Chile	58.4	1.4	5.8	2.4	68.0	3.6	86.8	2.0	92.4	160.4
Mexico	9.3	2.1	-3.5	0.3	8.2	5.7	54.9	-	60.6	68.7
Puerto Rico	-	0.3	0.0	1.0	1.3	1.0	-	0.2	1.2	2.5
United States	0.0	0.6	0.2	0.2	0.9	0.5	-	-	0.5	1.4
<b>Apac</b>	<b>0.0</b>	<b>0.1</b>	<b>0.6</b>	<b>-</b>	<b>0.7</b>	<b>0.6</b>	<b>0.1</b>	<b>-</b>	<b>0.7</b>	<b>1.4</b>
India	0.0	0.1	0.6	-	0.7	0.6	0.1	-	0.7	1.4
<b>Emea</b>	<b>81.3</b>	<b>135.7</b>	<b>225.9</b>	<b>58.5</b>	<b>501.4</b>	<b>128.7</b>	<b>494.4</b>	<b>27.5</b>	<b>650.7</b>	<b>1,152.0</b>
Austria	-	-	-	-	-	-	-	-	-	-
Croatia	0.1	0.6	0.1	0.0	0.8	0.0	-	-	0.0	0.8
France	155.9	60.8	167.6	20.2	404.5	37.0	276.0	0.1	313.1	717.7
Germany	-	-	-	-	-	-	-	-	-	-
Hungary	0.0	0.0	0.0	0.0	0.1	0.0	-	-	0.0	0.1
Ireland	0.5	-	3.3	-	3.8	1.8	0.1	-	1.9	5.8
Italy	21.2	53.0	18.5	8.0	100.6	62.0	44.2	22.8	129.0	229.5
Luxembourg	-	-	-	-	-	-	-	-	-	-
Netherlands	0.0	0.0	0.2	0.0	0.2	-	-	-	-	0.2
Poland	9.2	1.0	0.0	0.6	10.8	1.7	10.4	0.0	12.1	22.9
Portugal	-0.0	0.1	-	0.0	0.1	0.2	-0.1	0.0	0.1	0.3
Qatar	-	-	-	-	-	-	-	-	-	-
Spain	-106.7	19.1	31.3	29.6	-26.6	24.5	163.8	4.6	192.9	166.3
Switzerland	0.0	0.2	0.0	0.0	0.3	0.1	-	-	0.1	0.4
United Kingdom	1.1	0.7	4.9	-	6.7	1.4	-	-	1.4	8.1
<b>Totale</b>	<b>209.5</b>	<b>156.9</b>	<b>309.4</b>	<b>64.1</b>	<b>740.0</b>	<b>156.1</b>	<b>660.0</b>	<b>30.9</b>	<b>847.0</b>	<b>1,587.0</b>

## 6.5. RECONCILIATIONS WITH THE CONSOLIDATED FINANCIAL STATEMENTS

The reconciliation of the Country-by-Country Reporting (CbCR) data included in this document with the same information presented in Mundys consolidated financial statements as at 31 December 2022 is provided below.

Regarding the data on i. Third-party revenue; ii. Profit/(Loss) before tax; iii. Tangible assets; iv. Income tax paid in accordance with the cash basis of accounting; and v. Income tax accrued on profits/losses, please refer to the disclosure in section "6.5 Tax transparency" of the 2022 Annual Financial Report (Integrated Annual Report or IAR).

In this regard, it should be noted that the amounts shown in this report, unlike the same amounts disclosed in the above-mentioned section of the Integrated Annual Report, do not include the figures for the Autostrade per l'Italia (ASPI) subgroup, re-classified for the purposes of the consolidated financial statements as discontinued operations in accordance with IFRS 5.

Item (€m)	CbCR TTR (a)	CbCR data for ASPI (b)	Restatement of CbCR amounts	CbCR IAR (a+b+c)
Third-party revenue	12,966	1,431		14,396
Profit/(Loss) before tax	2,883	441	180	3,504
Tangible assets	856	-		856
Income tax paid in accordance with the cash basis of accounting	567	-22	8	553
Income tax accrued on profit/losses	644	75		719

The reconciliation of "Revenues" is only performed with reference to "Revenues from transactions with third parties" (€12,966 million). Intercompany revenues with other jurisdictions' (€231 million), by their nature, are not shown in the consolidated financial statements, as they are eliminated in the context of the consolidation process. Regarding the other CbCR data shown in this document:



The total figure for "Intangible assets deriving from concession rights" corresponds to the same data included in the consolidated financial statements



The total figure for "Wages and salaries" (€702 million) differs from the item "Wages, salaries and related contributions" in the consolidated financial statements (€937 million) insofar as the latter includes social security contributions (€235 million)

## 6.6. OTHER TAX INFORMATION

### Mundys' holdings and their tax residence jurisdictions

The Group is present in:

- **The Netherlands**, via Abertis Infraestructuras Finance B.V., established in November 2004. This company became part of the Group following the acquisition of Abertis (2018). The company, which carries out financial activities for the Abertis subgroup, issued bonds amounting to €1,250 million in 2020 and €750 million in 2021. Its location in a country with a highly dynamic financial market such as the Netherlands facilitates the Group's access to the capital market and enables more efficient management of bond issues;
- **Luxembourg**, via Aero I Global & International S.à.r.l ("Aero I"), a company acquired by Mundys SpA in March 2018. Aero I is a Luxembourg special purpose vehicle with a 15.49% stake (and 26.64% of the voting rights) in Getlink SE, a company with tax residency in France, listed on the Euronext Paris market, which holds the concession to operate the Channel Tunnel submarine link connecting France and the United Kingdom (formerly Groupe Eurotunnel SE);
- **Puerto Rico**, via entities of the Abertis subgroup that are mainly involved in operating toll road concessions. Abertis is one of the main players in the local market in Puerto Rico;
- **Ireland**, via entities of the Abertis subgroup, which operated the barrier-free "free-flow" toll system on the M-50 west of Dublin until August 2021. A minor operational contract is still currently in place;
- **Hungary**, via an entity of the Abertis subgroup that works on toll technology solutions, serving the local market in Central Europe and the Balkans;

- **Qatar**, through a branch of the Abertis subgroup that works on toll technology solutions. In 2020, the branch was awarded the contract to design and operate an urban tolling solution for the Doha Expressway;
- **Switzerland**, via an entity of the Telepass sub-group that develops software and technology applications used in the transport and urban mobility sector. The platform the technology application is based on is in Switzerland, although the service is exclusively aimed at Italian customers.

Moreover, via the acquisition of **Yunex** in 2022, entities operating in tax jurisdictions such as Belgium, Luxembourg, Hong Kong, the Netherlands, Singapore and Switzerland joined the Group<sup>1</sup>. Yunex entities in these jurisdictions conduct business by offering Intelligent Transport Systems and Smart Mobility solutions to local customers, primarily public administrations and other public bodies. In this regard, the on-site presence of Yunex entities and the personnel they employ foster the development of local business relations and is often required for participation in public tenders and competitions.

### The Group's uncertain tax positions

In line with the information already included in the Integrated Annual Report and in application of IFRIC 23, no uncertain tax positions were recognised in the accounting of income taxes in 2022.

1-1) Belgium: Yunex SA / NV Belgium; 2) Hong Kong: Yutrafic Ltd Hongkong; 3) Luxembourg: Yunex Branch Luxembourg; 4) Netherlands: Yunex Traffic BV Netherlands; 5) Singapore: AIMSUN Pte Ltd. Singapore and Yunex Pte. Ltd Singapore; 6) Switzerland: Yunex AG Switzerland; 7) Hungary: Yunex Traffic Kft. Hungary

## 6.7. DISCLAIMER

This document was prepared by Mundys with the support of a leading independent external consultant who has developed specific expertise in the field of tax transparency over the years.

The data contained therein, collected and processed internally by Mundys, were checked for consistency by the external consultant. However, the origin of the data was neither verified nor audited by the latter.

This document has been prepared in euros. Unless otherwise stated, amounts (except for the number of employees) are rounded to the first decimal place. As a result, the sum of rounded amounts may not coincide with the rounded total.

