



General offer of services dedicated to the real estate sector



I. Purchase/sales of real estate

1. VAT analysis on purchase/sales of real estate.
2. Detailed analysis of a transfer tax treatment (VAT or CLAT).
3. Tax structuring (including general taxation in Poland), in particular:
 - tax costs of the acquisition (including transfer taxes, financing);
 - tax aspects of debt financing;
 - tax aspects of ongoing operating activities of the property;
 - tax costs on distribution of funds generated by the property during the existence of the investment;
 - tax aspects of a potential future exit from the investment.
4. Asset Purchase Agreement tax review (including price split preparation for corporate tax purposes or CLAT purposes).
5. Application for an individual tax ruling related to purchase/sales transaction, fixed establishment and permanent establishment.
6. DAC6 – MDR reporting.
7. Real Estate Tax (RET) analysis.

II. Exit from the investment

1. Tax analysis on the exit from the investment.
2. CIT calculation in case of the share deal, including tax registration of the foreign entity (if required).

III. Tax advisory on other Real Estate Services, such as: developing, improving, managing (assets/property), operating, maintaining and leasing

1. VAT analysis on ongoing operating activities, in particular:
 - application of binding VAT regulation (including the preparation of tax instructions);
 - the necessity to amend VAT deduction due to an abandoned investment.
2. CIT analysis on ongoing operating activities, in particular:
 - application of WHT regulations (including the verification of a beneficial owner status, application for WHT opinion and WHT refund);
 - application of Minimum Tax regulations and Shifted Profit regulations;
 - application of regulations related to limitations on tax deductibility of costs;
 - application of regulations related to Polish Holding Company;
 - application of regulations related to real estate companies (including reporting).
3. PIT analysis on ongoing operating activities (including reporting).
4. CLAT analysis on ongoing operating activities.
5. RET analysis on ongoing operating activities and RET compliance.
6. Pillar II (GloBE) analysis and reporting.



IV. Other services provided to companies operating in real estate sector, such as:

1. Handling tax checks and tax controls.
2. Applying for individual tax rulings.
3. Representing clients in contact with tax authorities.
4. MDR reporting (preparing and submitting of MDR files).
5. Analysing the creation of fixed establishment (FE) and permanent establishment (PE).
6. Conducting tax audits and Tax Due Diligence (TDD).

TRANSFER PRICING ANALYSIS



1. Preparation and review of TP reports (economic & benchmark analysis, group TP Master file) regarding intra-group services (e.g. management services, IT services, etc.).

AUDIT

1. Audit services.
2. Financial Due Diligence (FDD).

ADVISORY SERVICES

1. Company/branch incorporation, sale of shares in a ready-made company as an SPV for the investment.
2. Legal analysis of companies' AoA.
3. Legal advisory on capital increase, decrease, mergers and transformations of companies.
4. Legal analysis and support in negotiating various contracts referring to real estate property: SPA, sale/purchase agreements, lease contracts, etc.
5. Preparing Shareholders' Meetings and Board Meetings minutes (including approval of Financial Statements).
6. Submitting FS to the NCR online as a proxy.
7. Preparing other corporate documentation for the companies: share books, minute books, etc.
8. Advisory to report UBO to the Central Register of Beneficial Owners.
9. Support in getting PESEL numbers for foreigners and digital signatures in Poland.
10. Liquidation of companies and branches.
11. Legal Due Diligence.

OUTSOURCING: ACCOUNTING, HR & PAYROLL

I. Accounting services and tax reporting

1. Ongoing accounting and tax support:
 - keeping your books of accounts on an ongoing basis;
 - drafting and filing relevant tax returns.
2. Year-end closing service:
 - preparing the CIT-8 return;
 - preparing annual financial statements in compliance with Polish law.
3. Additional services exceeding the scope of the standard support:
 - preparing external reports (to the Statistics Poland (GUS) and the National Bank of Poland (NBP) as well as management reports);
 - drafting and filing amendments to tax returns;
 - servicing audits and internal controls.
4. Implementation process:
 - establishing rules governing our cooperation, as well as document and information flow;
 - defining internal reporting requirements;
 - defining individual needs of your organisation and service delivery dates.



OUTSOURCING: ACCOUNTING, HR & PAYROLL

II. Payroll services

1. The ongoing payroll support covers:
 - running timely payrolls;
 - keeping employee timesheet records;
 - maintaining employee documents (personnel files);
 - validation of Occupational Health and Safety training certificates and medical check-ups;
 - preparation and transfer of payslips to the e-mail address of an employee or Client;
 - drafting and transfer of monthly ZUS reports;
 - updates of employee data in ZUS databases;
 - calculation of social insurance contributions;
 - calculation of monthly PIT advances.
2. Drafting annual PIT and ZUS returns and reports upon year-end closing.
3. Ad hoc assistance:
 - supporting the employment of new staff;
 - running employee exit processes.
4. Implementation process:
 - establishing rules for cooperation and document flow;
 - defining terms for handing over documentation and the Płatnik database;
 - identifying individual needs of your organization and setting service delivery dates.

DEDICATED TAX TEAM



Piotr LISS
Tax Partner

Tax advisor (ref. 10240)

Piotr graduated from the Poznań University of Economics, Faculty of Management. He was entered in the register of tax advisors in 2005. On board of RSM Poland since 2004, since 2008 a Partner in the Tax Department.

Piotr is a specialist in the field of corporate taxation, particularly with regard to corporate income tax and international taxation laws. He supervises projects related to tax optimisation and tax restructuring, as well as tax audits and due diligence projects. As an experienced practitioner, he shares his knowledge and expertise in tax law through training courses for management boards and financial and accounting authorities, as well as specialist training courses scheduled by the Polish Accountants' Association and other acclaimed training institutes. He is the author of numerous publications in the field of tax law (in, among others, the *Rzeczpospolita* daily and the *Dziennik Gazeta Prawna* daily) and monographs regarding corporate taxation. As a member of the Center of Excellence in Tax, he attends a number of international conferences, both as a participant and a speaker.

He is married with three children. Piotr spends his free time cycling and solving his clients' tax issues.



Monika SMAGA
Tax Director
Tax advisor (ref. 13741)

Monika is a graduate of the University of Economics in Katowice and has completed post-graduate studies at the Warsaw School of Economics in international tax strategies. She has gained her professional experience as a member of accounting teams in companies with both Polish and foreign equity as well as a company providing accounting and tax services (working in VAT Compliance and Tax Advisory departments), and one of the BIG 4 firms.

She joined RSM Poland in 2019 as a Tax Manager.

Monika is an expert in corporate taxation in the real estate sector, FMCG and renewable energy sources. Her main area of interest includes real estate tax, withholding tax, and other international taxes (e.g.: Pillar II) as well as regulations governing reportable arrangements (MDR / DAC 6). She provides consulting services on tax and transactional planning. She also carries out tax reviews and due diligence investigations.

As a practitioner, Monika shares her knowledge of taxes and professional expertise during multiple training courses which she conducts. She is an author of numerous publications on various tax issues (published in, i.a., *Rzeczpospolita* or Wolters Kluwer), and a co-author of one of the first books on Polish SAF-T.

After hours, she enjoys mountain hiking. Monika is also interested in paintings as well as culture and art of the Korean Peninsula.

DEDICATED AUDIT TEAM



Marcin KAWKA
Audit Partner

Statutory auditor (ref. 11864)

Marcin is a graduate of the Poznań University of Economics, specialisation: corporate finance and accounting. He also graduated from the Poznań University of Technology and is a qualified IT engineer. In 2009 he was entered in the register of statutory auditors.

Marcin has been with RSM Poland since 2001, and he is responsible for managing the audit department. He is in charge of the team during the performance of financial audit activities, in particular audits and reviews of individual and consolidated financial statements, consolidation packages, including those prepared in accordance with IFRS and US GAAP. Additionally, he supervises the examination of merger and transformation plans of companies. Marcin also manages the transaction advisory department at RSM Poland and is responsible for due diligence projects in Poland and abroad. In addition, he is a member of the management board of RSM Poland Audit.

As an external auditor, he has conducted audits of financial statements for entities such as: Terg group, OSI group, Sports Direct, Benetton Retail Poland, Boart Longyear, SealedAir, and participated in due diligence projects of some of the largest entities in the chemical industry, distribution of consumer electronics and household appliances, and green energy sector. As a long-term practicing professional, Marcin shares his knowledge and experience in accountancy and audit through training courses dedicated to management boards as well as finance and accounting authorities organised by the Accountants Association in Poland. He also actively participates in training within the RSM network as a member of the RSM IFRS Champions Group. Additionally, Marcin was active in the self-government of statutory auditors as a Member of the Regional Council of the Polish Chamber of Statutory Auditors in Poznań.

After hours, Marcin is an avid fan of football and running, spending his free time on running trails and football pitches.



Monika SKÓRKA
Audit Partner

Statutory auditor (ref. 11488)

Monika is a statutory auditor and a graduate of the Faculty of Economics of the Warsaw University of Life Sciences.

With RSM since 2014 as an Audit Partner. She is in charge of a team of specialists and deals with emerging substantive issues, verifies the performed works and takes final decisions regarding the type of documents issued to the client.

Monika specialises in auditing financial statements under the Polish Accounting Act and IFRS. She has wide experience in auditing domestic and foreign manufacturing and service companies and due diligence reports, gained in BDO Polska, Mazars, Misters Audytor and Grant Thornton Frąckowiak. As an auditor, she conducted audits of financial statements for the following entities: Animex Capital Group, PKP Capital Group, PWN Naukowe Capital Group, Adgar, Alpla Opakowania z Tworzyw Sztucznych, BIC Polska, Electropoli, Fenix Metals, Inter Europol, Ledvance, NTG Polar Road, TATA Consultancy Services, Totalizator Sportowy, Wielkopolski Bank Spółdzielczy (neoBank).

Monika is a passionate traveller and an animal lover. In her free time she supports local animal shelters.

DEDICATED LEGAL TEAM



**Krzysztof
WARAKOMSKI**
Corporate Advisory Manager

Krzysztof graduated in law from the Faculty of Law and Administration of Adam Mickiewicz University in Poznań and completed a three-year legal advisor's apprenticeship conducted by the Regional Chamber of Legal Advisors in Szczecin.

He has been advising entrepreneurs for more than 10 years. He gained experience working with law firms specializing in corporate services. Legal advisor since 2017, with RSM since 2018. He implements and supervises legal support for business clients as Manager in the Corporate Advisory Department.

Krzysztof specializes in corporate law, business law and commercial contracts. He has extensive experience in the processes of incorporation, transformation, merger and liquidation of companies in the service and industrial sectors. He conducts and supervises legal due diligence projects and legal advisory on business sales. Krzysztof speaks fluent English.

Privately, Krzysztof is a fan of traveling, healthy and active lifestyle, reading, and in winter he loves snowboarding.



**Hubert
KĘDRACKI**
Corporate Advisory Manager

Hubert graduated from Adam Mickiewicz University in Poznań, Faculty of Law and Administration. He was entered into the register of legal counsels of the District Chamber of Legal Counsels in Poznań in 2021.

With RSM since 2022.

He gained his professional experience both in the legal department providing services to manufacturing enterprises and in cooperation with law firms, where he supported entrepreneurs in all legal matters related to their business.

Hubert specializes in comprehensive business consulting for entrepreneurs, as well as in conducting proceedings in the field of commercial company law, such as the formation, ongoing management and liquidation of companies and in the processes of transformation, division and merger of companies. He also provides support in processes of due diligence and transaction advisory (M&A).

Hubert is fluent in English and communicative in Spanish.

DEDICATED OUTSOURCING EXPERT



Anna RAMUT
Accounting & Payroll Partner

Anna graduated in accounting from the Krakow University of Economics. She is an auditor (Register No. 12372) and also a certified accountant (Certificate No. 15951).

With RSM Poland since 2019 as Partner managing the office in Katowice. Before that, from 2006, she had run a business providing bookkeeping and HR and payroll services to Polish and international companies and had been in charge of the Audit Department. Anna has extensive experience in providing comprehensive services to service provision (IT and technology), manufacturing (automotive and electronics), and trade companies.

Privately an enthusiast of an active lifestyle, she spends her free time on meeting friends, working out, bicycle rides, and travelling.

WHY RSM?



TRUSTED BRAND

RSM Poland is the only Polish member firm of RSM, a leading network of independent audit, tax and advisory companies, encompassing over 120 countries, 810 offices and 43,000 people internationally. RSM has twice become the winner of the prestigious 'Network of the Year' title awarded by the International Accounting Bulletin. In 2019, RSM saw record global revenue of USD 5.74 billion, showing growth for the sixth consecutive year.

RSM Poland is the 10th largest auditing company in Poland according to the 'Rzeczpospolita' ranking of 18 April 2016 and the most effective tax advisory firm in the ranking of 13 March 2013 published by 'Dziennik Gazeta Prawna'.

INTERNATIONAL NETWORK

We are leaders in providing services to international clients – mainly international Capital Groups. We provide comprehensive services in Polish, English and German. We advise both domestic and foreign enterprises operating in Poland and abroad.

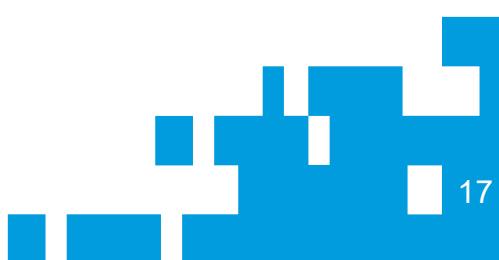
Companies united under the RSM brand are leaders in advisory services on domestic markets. The close relationships within the RSM network guarantee that the services offered by RSM all over the world are tailored to meet individual needs of clients and provided at the same highest possible standards.

INDIVIDUAL APPROACH TO EACH CLIENT

We know that each enterprise requires individual approach. Therefore, when planning provision of our services, we focus on specific needs of our client, with whom we determine the methods and deadlines. We support our clients in achieving their goals in the most effective and safe way possible. This can be achieved through direct and successful communication as well as intelligent case management.

RELIABILITY AND EXPERIENCE

We have been operating in the business consulting market since 1991. During this time, we have gained a wealth of expertise and experience. We have also managed to build a unique team of top experts. We set high requirements for our staff, so that our clients can be sure that they are advised by the best specialists, who first and foremost value Quality, Assurance, Reliability and Experience.



Should you have any questions,
please do not hesitate to contact us

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