Current Report no. 21/2025

<u>Number and Date of the Current Report:</u>

Current Report no. **21/2025** dated 27 November 2025

<u>Subject of the Current Report:</u>

Refund of the overpaid corporate income tax and potential impact on the 2025 Group financial results

<u>Legal basis</u>:

Article 17 sec. 1 of MAR – inside information.

<u>Contents of the report</u>:

Zabka Group S.A. (the "**Company**") announces that having reviewed:

(a) the written rationale of the non-appealable Supreme Administrative Court's (Polish: *Naczelny Sąd Administracyjny*) judgment of 17 July 2025 on the individual tax ruling concerning tax law provisions governing the recognition of the debt financing costs as tax deductible costs of Żabka Polska sp. z o.o. ("**Żabka Polska**") (the "**NSA Judgment**"), and

(b) the outcome of tax proceedings conducted by the Head of the First Mazovian Tax Office in Warsaw (Polish: *Naczelnik Pierwszego Mazowieckiego Urzędu Skarbowego*) regarding the refund of the Żabka Polska's overpaid corporate income tax for 2018 (the "**Proceedings**"),

the Company has identified a potential material positive impact on Żabka Polska's net financial result for 2025 and, consequently, on the Group's consolidated net financial result.

In 2018 – 2025, part of the debt financing costs incurred by Żabka Polska was recognized as tax non-deductible costs by the Group. Considering the NSA Judgment the Company believes that the recognition of these debt financing costs as tax-deductible is justified. This position is corroborated by Żabka Polska obtaining on 26 November 2025 a reimbursement of the overpaid corporate income tax for 2018 in the amount of PLN 14.5 million.

The Company believes that obtaining the refund of overpaid corporate income tax for 2018 also affects Żabka Polska's tax position in other reporting periods. Similarly to 2018, Żabka Polska plans to apply for a refund of overpaid corporate income tax for the non-expired years 2019 – 2024 and obtain the refund in line with the approach confirmed by the NSA Judgement and the Proceedings.

The Company estimates the potential, joint impact of obtained refund of corporate income tax for 2018 and positive future approval of refund applications for 2019 – 2024 on the 2025 net financial result of Żabka Polska at approximately PLN 187 million, and in the same amount on the 2025 consolidated net financial results of the Group.

In addition, the Company believes that the NSA Judgment will have a positive impact on future settlements of Żabka Polska in terms of determining the tax-deductible debt financing costs.