

Declaration on Public Country-by-Country Reporting for the Enterprises of the multinational Group JSC Samruk-Kazyna

The report on information related to corporate income tax for the reporting period of 2023, ending on December 31, 2023 ("FY2023"), also referred to as the public country-by-country reporting ("Public CbC Report" or "Report"), concerning the enterprises of the multinational group JSC Samruk-Kazyna Group ("Group"), has been prepared in accordance with the provisions of Chapter 13¹ of *Order 1802/2014 for the approval of Accounting regulations regarding the individual and consolidated annual financial statements*, as well as Chapter 8¹ of *Order 2844/2016 for the approval of Accounting regulations compliant with International Financial Reporting Standards*, as further amended and completed. It is currently available free of charge on the Rompetrol Group's website:

<https://www.rompetrol.com/group-reports>

The data and information contained in the Report pertain exclusively to the operations of the JSC Samruk-Kazyna Group in Romania. The public CbC Report does not include information regarding the Group's operations in other jurisdictions, as such information has not been made available to the entities in Romania by the Group's ultimate parent company for the reasons outlined below:

- Romania introduced the requirements for publishing the CbC report two years earlier than other European Union member states, where the obligation to present such information will take effect starting with the 2025 calendar year. Under these circumstances, the disclosure of centralized information regarding operational activities, financial data, and detailed tax information by fiscal jurisdictions where the Group operates could be a sensitive issue, potentially jeopardizing the Group's competitive position and strategic initiatives, especially given that this information would be disclosed two years before other companies are subject to a similar obligation.
- The JSC Samruk-Kazyna Group consistently aims to comply with tax and accounting regulations and compliance standards in every jurisdiction where it operates. However, the early implementation of the disclosure requirements for Public CbC purposes may place the Group at a disadvantage.
- The requirement to publish the report in a readable electronic format, in the absence of a predefined structure issued by authorities, leaves room for uncertainty and interpretation.

- As an alternative to publishing the report on the entity's/subsidiary's/branch's website, the law provides the option to simultaneously make the report available to the public in a readable format on the online registry mentioned in Directive (EU) 2017/1132, as transposed into national legislation, and free of charge to any third party within the Union. The fact that no procedures have yet been published in this regard makes the process of publishing the Report even more uncertain and challenging.

Therefore, considering the reasons outlined above, including the lack of detailed guidelines on how to efficiently complete and submit the required information, at this stage, regarding the obligation for the Public CbC Report, the Group opts to provide information exclusively for entities in Romania.

At the same time, the JSC Samruk-Kazyna Group intends to present complete information starting with the 2025 calendar year, when the Public CbC Report will become a standard practice for all large multinational groups operating in the European Union, which will then face similar compliance requirements.

Public Country-by-Country Reporting for the Multinational Enterprises of JSC Samruk-Kazyna Group

General information regarding the Ultimate Parent Company of the Group

| | |
|--|---|
| Name of the Group | JSC Samruk-Kazyna |
| Name of the ultimate parent of the Group | Samruk-Kazyna Sovereign Wealth Fund JSC |
| Country in which the ultimate parent company is registered | Kazakhstan |
| Tax identification number of the ultimate parent company | 081140000436 |
| Fiscal year – start date | 01.01.2023 |
| Fiscal year – end date | 31.12.2023 |
| Reporting Currency | RON |

| | |
|---|--|
| Is the information in the report based on the reporting instructions used for tax purposes, pursuant to Section III, Parts B and C of Annex III to Council Directive 2011/15/EU (yes/no)? | Yes |
| General comments | <p>The revenues presented below do not include dividend income received by the entities in Romania. The total revenues include also foreign exchange income.</p> <p>The corporate income tax recorded and paid includes the solidarity contribution owed by companies engaged in activities in the oil, natural gas, coal, and refinery sectors.</p> |

General information regarding the entities in Romania of the Group

General overview of the elements' allocation for each country individually

| | |
|---|-----------------|
| Tax Jurisdiction | Romania |
| Country Code | RO |
| Revenues | 35,304,209,771 |
| Gross Profit (Loss) | (122,106,183) |
| Corporate Income Tax Paid -on Cash basis | 659,305,272 |
| Income Tax Accrued - current year | 221,873,316 |
| Accumulated Gains (Losses) | (5,918,405,646) |
| Number of Employees | 4,375 |
| Additional columns may be added as needed | NA |

List of subsidiaries and activities

| | |
|----------------------------------|--------------|
| Member State or Tax Jurisdiction | Country Code |
| Romania | RO |

| Entity | Description of the activity |
|--|--|
| Rompetrol Energy | Rompetrol Energy, a company established with the purpose of designing, building, operating, and owning a new cogeneration thermal power plant to produce and sell electricity and thermal energy, using gaseous and liquid fuel. |
| Byron Shipping SRL | Byron Shipping SRL operates as a shipping agency for some of the tankers anchored in the Midia port (under the name "The Rompetrol Shipping Agency"). |
| KMG Rompetrol Service Center SRL | KMG Rompetrol Service Center SRL provides support services to affiliated entities, such as: administrative services, secretarial services, legal services, procurement services, financial services, human resources services, etc. |
| KMG Rompetrol SRL | KMG Rompetrol SRL acts as the corporate centre of the KMG International Group, providing its members with a wide range of services, particularly management consulting services, as well as other services provided centrally at the group level (assistance in human resources, finance, legal, IT, etc.). |
| Romanian Kazah Energy Investment Fund SA | Romanian Kazah Energy Investment Fund SA operates under the main NACE code "6420 - Activities of holding companies," and its main objectives focus on investing in projects related to the operations of the KMG group in the following industries: oil and gas, extraction, refining, distribution, storage, transportation, services, and marketing, as well as electricity: production, distribution, and supply. |
| Rompetrol Development SRL | Rompetrol Development SRL its main activity is the rental of distribution stations to the affiliated entity Rompetrol Downstream SRL. |
| Rompetrol Downstream SRL | Rompetrol Downstream is active in the fuel distribution market since its establishment. The company operates six fuel depots, as well as a local network of fuel distribution stations, including both its own stations and those owned by partners, ensuring its presence across the entire territory of Romania. |
| Rompetrol Well Services SA | Rompetrol Well Services SA offers a wide range of services for oil and natural gas wells. These services include cementing and various pumping operations, well stimulation, tubing operations, nitrogen services, equipment rentals, etc. |

| Entity | Description of the activity |
|---|---|
| Midia Marine Terminal SRL | Midia Marine Terminal SRL operates the main logistical assets of the Petromidia and Vega refineries, with the primary activity of handling goods transported by sea (crude oil, refined petroleum products, LPG, ethylene, and other petroleum products or raw materials) to/from ships until the completion of loading/unloading operations. |
| Rompetro Petrochemicals SRL | Rompetro Petrochemicals is the petrochemical division of the Rompetrol Group. |
| Rompetro Quality Control SRL | The main activity of Rompetrol Quality Control is conducting testing and technical analysis activities, according to NACE code 7120 - "Testing and technical analysis activities," along with other secondary activities as specified in the company's articles of incorporation. |
| Rompetro GAS SRL | Rompetro GAS SRL operates in the wholesale trade of solid, liquid, and gaseous fuels and derivative products, according to NACE code 4671 - "Wholesale trade of solid, liquid, and gaseous fuels and derivative products." The company is also involved in the production of LPG through the blending of several components, predominantly purchased from the affiliated company Rompetrol Rafinare SA. |
| Rominserv SRL | Rominserv SRL specializes in delivering industrial investment projects and full maintenance services, with the aim of modernizing and technologizing the refining processes of the Group, fuel distribution stations, logistics terminals, and docks. |
| Rompetro Rafinare SA | Rompetro Rafinare SA operates two refineries: Petromidia and Vega, as well as the petrochemical division. |
| Oilfiled Explorations Business Solutions SA | Oilfiled Explorations Business Solutions SA has as main activity code NACE code 0910 - "Support activities for the extraction of crude oil and natural gas," operating in the extractive industry. |
| Rompetro Financial Group SRL | Rompetro Financial Group SRL has as main activity the provision of holding activities according to NACE code "6420." |
| Rompetro Logistics SRL | Rompetro Logistics SRL is a limited liability company within the KMG International Group that currently predominantly engages in space rental activities. |
| RomOil SRL | RomOil SRL primarily carries out the rental of spaces owned by the company to Rompetrol Downstream SRL, according to NACE code 6820 - "Rental and subletting of own or leased real estate." |
| Global Solution Services SRL | Global Solution Services SRL provides activities according to NACE 8010 - "Security and guard services." |
| Global Security System - Fire Services SRL | Global Security System - Fire Services SRL provides fire prevention and extinguishing services. |
| Rompetro Renewables SRL | Rompetro Renewables SRL has as its main activity the production of electricity. |