

REPORT ON CORPORATE INCOME TAX INFORMATION

Citrosuco Group - Fiscal Year 2024/2025

Section 1 – General Information

Field	Value
Ultimate Parent	Citrosuco GmbH
Country	Austria
Registration Number	125037705
Address	Millennium Tower 35 th floor, Handelskai 94-96, AT-1200 WIEN
Reporting Currency	USD
Fiscal Year Start	07/01/2024
Fiscal Year End	06/30/2025
DAC4/OECD Based	Yes
Belgian Subsidiary	Citrosuco Europe NV
Belgian Company Number	0420840438

Section 2 – Overview of Information on a Country-by-Country Basis

Jurisdiction	Code	Revenue	Profit Before Tax	Tax Paid	Tax Accrued	Employees
Austria	AT	1,365,602,787.97	-9,799,655.03	6,084,138.39	7,605,207.42	30
Belgium	BE	15,397,114.79	403,430.74	282,597.00	237,811.45	66.96
Spain	SP	411.05	42,115.14	0.00	0.00	0
All other tax jurisdictions		682,598,729.23	27,034,784.84	13,530,644.78	8,428,615.49	101

Section 3 – List of Entities and Activities

Jurisdiction	Code	Entity Name	Activity
Austria	AT	Citrosuco GmbH	Sales, Marketing or Distribution
Belgium	BE	Citrosuco Europe NV	Administrative, Management or Support Services
Spain	SP	Citrosuco Spain S.L.	Dormant
United States	US	Citrosuco North America	Sales, Marketing or Distribution
China	CN	Citrosuco (Shanghai) Co., Ltd.	Sales, Marketing or Distribution
Australia	AU	Votorantim International Australia PTY LTD	Sales, Marketing or Distribution
Australia	AU	Juice Terminal Australia PTY Limited	Other
Japan	JP	Nippon Fruit Juice Co. LTD	Sales, Marketing or Distribution
Liberia	LR	Victoria Shipping International Corporation	Other
Liberia	LR	Promenade Shipping Corporation	Other
Liberia	LR	Esplanade Shipping Corporation	Other
Liberia	LR	Premium International Shipping Corporation	Other
Liberia	LR	Citrus Vita Brasil Shipping Company	Other

Section 4 – Tax Explanations

No material discrepancies between income tax paid and accrued were reported.

Section 5 – List of Nature of Activities

Research and Development
Holding or Managing Intellectual Property
Purchasing or Procurement
Manufacturing or Production
Sales, Marketing or Distribution
Administrative, Management or Support Services
Provision of Services to Unrelated Parties
Internal Group Finance
Regulated Financial Services
Insurance
Holding Shares or Other Equity instruments
Dormant
Other

Section 6 – Country List Reference

Country selection	ISO	Country name
Andorra	AD	Andorra
United Arab Emirates	AE	United Arab Emirates
Afghanistan	AF	Afghanistan
Antigua and Barbuda	AG	Antigua and Barbuda
Anguilla	AI	Anguilla
Albania	AL	Albania
Armenia	AM	Armenia
Netherlands Antilles	AN	Netherlands Antilles
Angola	AO	Angola
Antarctica	AQ	Antarctica
Argentina	AR	Argentina
American Samoa	AS	American Samoa
Austria	AT	Austria
Australia	AU	Australia
Aruba	AW	Aruba
Azerbaijan	AZ	Azerbaijan
Bosnia-Herzegovina	BA	Bosnia-Herzegovina
Barbados	BB	Barbados
Bangladesh	BD	Bangladesh
Belgium	BE	Belgium
Burkina Faso	BF	Burkina Faso
Bulgaria	BG	Bulgaria
Bahrain	BH	Bahrain
Burundi	BI	Burundi
Benin	BJ	Benin
Bermuda	BM	Bermuda
Brunei Darussalam	BN	Brunei Darussalam
Bolivia	BO	Bolivia
Brazil	BR	Brazil
Bahamas	BS	Bahamas
Bhutan	BT	Bhutan
Bouvet Island	BV	Bouvet Island
Botswana	BW	Botswana
Belarus	BY	Belarus
Belize	BZ	Belize
Canada	CA	Canada
Cocos (Keeling) Islands	CC	Cocos (Keeling) Islands
Central African Republic	CF	Central African Republic
Congo	CG	Congo
Switzerland	CH	Switzerland
Ivory Coast (Cote D'Ivoire)	CI	Ivory Coast (Cote D'Ivoire)
Cook Islands	CK	Cook Islands

Chile	CL	Chile
Cameroon	CM	Cameroon
China	CN	China
Colombia	CO	Colombia
Costa Rica	CR	Costa Rica
Former Czechoslovakia	CS	Former Czechoslovakia
Cuba	CU	Cuba
Cape Verde	CV	Cape Verde
Christmas Island	CX	Christmas Island
Cyprus	CY	Cyprus
Czech Republic	CZ	Czech Republic
Germany	DE	Germany
Djibouti	DJ	Djibouti
Denmark	DK	Denmark
Dominica	DM	Dominica
Dominican Republic	DO	Dominican Republic
Algeria	DZ	Algeria
Ecuador	EC	Ecuador
Estonia	EE	Estonia
Egypt	EG	Egypt
Western Sahara	EH	Western Sahara
Eritrea	ER	Eritrea
Spain	ES	Spain
Ethiopia	ET	Ethiopia
Finland	FI	Finland
Fiji	FJ	Fiji
Falkland Islands	FK	Falkland Islands
Micronesia	FM	Micronesia
Faroe Islands	FO	Faroe Islands
France	FR	France
France (European Territory)	FX	France (European Territory)
Gabon	GA	Gabon
Great Britain	GB	Great Britain
Grenada	GD	Grenada
Georgia	GE	Georgia
French Guyana	GF	French Guyana
Ghana	GH	Ghana
Gibraltar	GI	Gibraltar
Greenland	GL	Greenland
Gambia	GM	Gambia
Guinea	GN	Guinea
Guadeloupe (French)	GP	Guadeloupe (French)
Equatorial Guinea	GQ	Equatorial Guinea
Greece	GR	Greece
S. Georgia & S. Sandwich Isls.	GS	S. Georgia & S. Sandwich Isls.
Guatemala	GT	Guatemala

Guam (USA)	GU	Guam (USA)
Guinea Bissau	GW	Guinea Bissau
Guyana	GY	Guyana
Hong Kong	HK	Hong Kong
Heard and McDonald Islands	HM	Heard and McDonald Islands
Honduras	HN	Honduras
Croatia	HR	Croatia
Haiti	HT	Haiti
Hungary	HU	Hungary
Indonesia	ID	Indonesia
Ireland	IE	Ireland
Israel	IL	Israel
India	IN	India
British Indian Ocean Territory	IO	British Indian Ocean Territory
Iraq	IQ	Iraq
Iran	IR	Iran
Iceland	IS	Iceland
Italy	IT	Italy
Jersey	JE	Jersey
Jamaica	JM	Jamaica
Jordan	JO	Jordan
Japan	JP	Japan
Kenya	KE	Kenya
Kyrgyzstan	KG	Kyrgyzstan
Cambodia	KH	Cambodia
Kiribati	KI	Kiribati
Comoros	KM	Comoros
Saint Kitts & Nevis Anguilla	KN	Saint Kitts & Nevis Anguilla
North Korea	KP	North Korea
South Korea	KR	South Korea
Kuwait	KW	Kuwait
Cayman Islands	KY	Cayman Islands
Kazakhstan	KZ	Kazakhstan
Laos	LA	Laos
Lebanon	LB	Lebanon
Saint Lucia	LC	Saint Lucia
Liechtenstein	LI	Liechtenstein
Sri Lanka	LK	Sri Lanka
Liberia	LR	Liberia
Lesotho	LS	Lesotho
Lithuania	LT	Lithuania
Luxembourg	LU	Luxembourg
Latvia	LV	Latvia
Libya	LY	Libya
Morocco	MA	Morocco
Monaco	MC	Monaco

Moldavia	MD	Moldavia
Montenegro	ME	Montenegro
Madagascar	MG	Madagascar
Marshall Islands	MH	Marshall Islands
Macedonia	MK	Macedonia
Mali	ML	Mali
Myanmar	MM	Myanmar
Mongolia	MN	Mongolia
Macau	MO	Macau
Northern Mariana Islands	MP	Northern Mariana Islands
Martinique (French)	MQ	Martinique (French)
Mauritania	MR	Mauritania
Montserrat	MS	Montserrat
Malta	MT	Malta
Mauritius	MU	Mauritius
Maldives	MV	Maldives
Malawi	MW	Malawi
Mexico	MX	Mexico
Malaysia	MY	Malaysia
Mozambique	MZ	Mozambique
Namibia	NA	Namibia
New Caledonia (French)	NC	New Caledonia (French)
Niger	NE	Niger
Norfolk Island	NF	Norfolk Island
Nigeria	NG	Nigeria
Nicaragua	NI	Nicaragua
Netherlands	NL	Netherlands
Norway	NO	Norway
Nepal	NP	Nepal
Nauru	NR	Nauru
Neutral Zone	NT	Neutral Zone
Niue	NU	Niue
New Zealand	NZ	New Zealand
Oman	OM	Oman
Panama	PA	Panama
Peru	PE	Peru
Polynesia (French)	PF	Polynesia (French)
Papua New Guinea	PG	Papua New Guinea
Philippines	PH	Philippines
Pakistan	PK	Pakistan
Poland	PL	Poland
Saint Pierre and Miquelon	PM	Saint Pierre and Miquelon
Pitcairn Island	PN	Pitcairn Island
Puerto Rico	PR	Puerto Rico
Portugal	PT	Portugal
Palau	PW	Palau

Paraguay	PY	Paraguay
Qatar	QA	Qatar
Reunion (French)	RE	Reunion (French)
Romania	RO	Romania
Serbia	RS	Serbia
Russian Federation	RU	Russian Federation
Rwanda	RW	Rwanda
Saudi Arabia	SA	Saudi Arabia
Solomon Islands	SB	Solomon Islands
Seychelles	SC	Seychelles
Sudan	SD	Sudan
Sweden	SE	Sweden
Singapore	SG	Singapore
Saint Helena	SH	Saint Helena
Slovenia	SI	Slovenia
Svalbard and Jan Mayen Islands	SJ	Svalbard and Jan Mayen Islands
Slovak Republic	SK	Slovak Republic
Sierra Leone	SL	Sierra Leone
San Marino	SM	San Marino
Senegal	SN	Senegal
Somalia	SO	Somalia
Suriname	SR	Suriname
Saint Tome (Sao Tome) and Principe	ST	Saint Tome (Sao Tome) and Principe
Former USSR	SU	Former USSR
El Salvador	SV	El Salvador
Syria	SY	Syria
Swaziland	SZ	Swaziland
Turks and Caicos Islands	TC	Turks and Caicos Islands
Chad	TD	Chad
French Southern Territories	TF	French Southern Territories
Togo	TG	Togo
Thailand	TH	Thailand
Tadjikistan	TJ	Tadjikistan
Tokelau	TK	Tokelau
Turkmenistan	TM	Turkmenistan
Tunisia	TN	Tunisia
Tonga	TO	Tonga
East Timor	TP	East Timor
Turkey	TR	Turkey
Trinidad and Tobago	TT	Trinidad and Tobago
Tuvalu	TV	Tuvalu
Taiwan	TW	Taiwan
Tanzania	TZ	Tanzania
Ukraine	UA	Ukraine
Uganda	UG	Uganda

USA Minor Outlying Islands	UM	USA Minor Outlying Islands
United States	US	United States
Uruguay	UY	Uruguay
Uzbekistan	UZ	Uzbekistan
Vatican City State	VA	Vatican City State
Saint Vincent & Grenadines	VC	Saint Vincent & Grenadines
Venezuela	VE	Venezuela
Virgin Islands (British)	VG	Virgin Islands (British)
Virgin Islands (USA)	VI	Virgin Islands (USA)
Vietnam	VN	Vietnam
Vanuatu	VU	Vanuatu
Wallis and Futuna Islands	WF	Wallis and Futuna Islands
Samoa	WS	Samoa
Kosovo	XK	Kosovo
Yemen	YE	Yemen
Mayotte	YT	Mayotte
Yugoslavia	YU	Yugoslavia
South Africa	ZA	South Africa
Zambia	ZM	Zambia
Zaire	ZR	Zaire
Zimbabwe	ZW	Zimbabwe
Stateless entities	X5	Stateless entities