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## Tax Compliance Management: Polish Enterprises in the Co-Operative Tax Compliance Programme

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Barbara Zbroińska<sup>1</sup>, Izabela Konieczna<sup>2</sup>

### **Abstract:**

**Purpose:** The aim of the study is to outline the assumptions of the pilot Co-operative Tax Compliance Programme introduced in Poland, as well as to conduct an analysis and characterization of the companies that have joined the programme.

**Design/Methodology/Approach:** The research employs the method of analysis and critique of literature and legal acts, logical analysis and construction, as well as a comparative analysis of statistical data and financial results of the companies participating in the programme.

**Findings:** As of mid-2025, the programme included 15 companies in good financial standing, characterized by high credibility and a negligible bankruptcy risk. These entities paid the due income tax and did not engage in transactions or settlements in countries practicing harmful tax competition. Prior to concluding the co-operative compliance agreement, the companies applied for individual tax rulings, which demonstrates that tax certainty is a significant motive for participating in the programme.

**Practical Implications:** The results of the analysis confirm international experiences, indicating that large organizations with strong market and financial positions, which prioritize maintaining a good reputation, show a significant interest in co-operative compliance. The programme promotes ethical and socially responsible business conduct in the interest of both the state and the taxpayer.

**Originality/Value:** The article presents the author's own assessment of the experiences gained from the implementation of the co-operative tax compliance pilot programme in Poland.

**Keywords:** Compliance Risk Management, Tax compliance, co-operative compliance.

**JEL classification:** K40, M14.

**Paper Type:** Research article

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<sup>1</sup>Jan Kochanowski University of Kielce, Poland, ORCID: 0000-0002-1724-0786,  
e-mail: [barbara.zbroinska@ujk.edu.pl](mailto:barbara.zbroinska@ujk.edu.pl);

<sup>2</sup>Jan Kochanowski University of Kielce, Poland, ORCID: 0000-0002-3632-3245,  
e-mail: [izakonieczna@ujk.edu.pl](mailto:izakonieczna@ujk.edu.pl);

## **1. Introduction**

The social costs of an unfair tax burden distribution – disproportionate to actual income due to tax avoidance – are borne by both the state and law-abiding enterprises. The effects of tax erosion caused by aggressive tax planning have initiated collective international actions aimed at curbing this phenomenon.

This cooperation has resulted in a declaration of measures against tax avoidance, involving changes in tax legislation and the implementation of guidelines for tax authorities focused on close cooperation in information exchange. Key initiatives include the Base Erosion and Profit Shifting (BEPS) project (OECD 2013, Action Plan) and the adoption of the EU Anti-Tax Avoidance Directive (ATAD), which contains provisions preventing the shifting of profits to low-tax jurisdictions (Council, 2016). Relevant amendments to tax regulations were introduced in Poland in 2018.

The recommendations and procedures implemented by tax authorities have proven insufficiently effective in curbing tax avoidance. Multinational corporations, in particular, evade restrictions by exploiting differences and loopholes in the tax regulations of the countries where their group entities operate (Kluzek, 2020).

The traditional approach to tax enforcement, based on direct audits and repressive measures, no longer meets the demands of dynamic economic development and modern management practices. This has prompted governments and tax administrations to adopt a more innovative, informal approach toward the taxpayer – one based on cooperation, mutual trust, and taxpayer self-control, supported by the assistance of the tax authority.

The concept of co-operative compliance emerged from concerns regarding the tax administration's ineffectiveness in enforcing tax liabilities, particularly in the face of increasingly sophisticated tax optimization methods employed by large entities, especially multinational corporations. Co-operation offers organizations the opportunity to choose an honest approach to their tax obligations in exchange for tax certainty. The Co-operative Tax Compliance Programme was introduced in Poland in 2020.

## **2. Prerequisites for Tax Compliance Risk Management**

The growing problem of lost tax revenues, the limited resources of tax administrations, and concerns over rising social dissatisfaction with the coercive nature of tax enforcement of state fiscal authorities have inspired an interest in tax risk management and the implementation of tax compliance management procedures (OECD, 2004). In the OECD guidelines, tax compliance is defined as the extent to which a taxpayer complies with legal regulations regarding registration, filing, reporting, and payment.

Tax compliance risk management is a continuous process that supports decision-making, encompassing the stages of systematic risk identification, assessment, classification, and treatment (OECD, 2004). It falls within the scope of general Enterprise Risk Management (ERM) and concerns the most critical element of tax risk for an organization (OECD, 2016).

Managing tax risk and non-compliance is an element of organizational culture that positively impacts the image of a socially responsible organization. Tax transparency is also included among the criteria of the international ranking GRI 207: Tax 2019 (Grinbau, 2022).

In an era of deepening globalization, dynamic changes are occurring in the corporate environment, driven by the activities of multinational corporations, the growth of e-commerce, shifting employment models, a rapid increase in the number of contractors, and the anonymity of transactions, alongside innovations in business structures and financial products. Applying the law under these conditions is becoming increasingly complex and fraught with growing risk.

Multinational enterprises experience legal risk associated with conducting transactions across countries with diverse tax systems. Discrepancies in the assessment of tax consequences stem, to some extent, from differing interpretations of the law, the non-complementary nature of regulations across various states, and efforts to find solutions for complex legal situations; they are not always a manifestation of deliberate manipulation (Björklund, 2021).

In a volatile environment and with the vast international scope of business activities, a growing role for tax advisory services and a rapid expansion of the market for aggressive tax planning services have been observed (OECD, 2008). Commercial activity in this area undermines the state's fiscal interests and prompts administrative initiatives that serve as a counterweight to the temptation of tax avoidance.

As early as 2004, OECD guidelines pointed to the need for a shift in tax authority strategies – moving towards cooperation with the taxpayer, a better understanding of business operations, and the identification of the causes of non-compliance and the motives behind taxpayer decisions.

The 2008 document highlighted the necessity of strengthening the enhanced relationship between the tax authority and the taxpayer to encourage openness and information disclosure.

It was emphasized that the success of this mission depends on the proper attitude of the tax authority, characterized by business understanding, impartiality, proportionality, transparency, and responsiveness (OECD, 2008). The administration is expected to be flexible and prepared for various responsive strategies tailored to different taxpayer attitudes.

### **3. The Assumptions of the Co-operative Compliance Concept**

A consequence of the evolving approach to tax enforcement is the further development of the ‘enhanced relationship’ postulate into co-operative compliance. The primary objective of the tax authority is to collect due taxes and fees in accordance with the law and in a manner that sustains trust in the state, as represented by the administration.

The co-operative compliance model serves as a complement to the traditional vertical oversight scheme: auditing, tax enforcement, and the application of sanctions. The essence of the tax administration’s approach is encapsulated in the statement: ‘co-operation where possible, and enforcement where necessary’ (OECD, 2013, Co-operative, p. 42).

In the co-operative model, the role of the tax authority is to make a justified selection of tools to effectively stimulate compliance and prevent violations, while the taxpayer’s efforts to ensure tax compliance should be supported by the tax authority in their mutual interest.

The objective of the co-operative tax compliance programme is to ensure the tax compliance of large entities even before the tax return is filed and an audit is initiated. The taxpayer expresses a readiness to disclose significant information regarding tax risk assessments, ambiguous situations, and uncertainties in the interpretation of regulations. In return, they obtain real-time tax certainty, as encapsulated in the principle: ‘providing certainty in exchange for transparency’ (OECD, 2016).

This approach transforms not only the working style of the tax administration but also the taxpayer’s internal organization of the tax function. Instead of confrontation-based relations, it proposes a partnership founded on full transparency of operations and documentation. Under this model, the taxpayer fulfills tax obligations through established internal control procedures, while the tax authority adopts a responsible approach, providing the taxpayer with tax certainty.

Social norms and informal institutions gain greater significance in the relationship between the taxpayer and the tax authority. This informal approach operates within the framework of existing law as a ‘soft law’ instrument, requiring high levels of competence from both parties (Gribnau, 2022).

Integrity is binding for both sides: the taxpayer expects their arguments to be heard, and the authority’s decisions to be clearly explained. Achieving tax compliance through co-operation and informal relations is a dynamic process in which both parties mutually explore the boundaries of compromise within the limits of the law (Björklund, 2021).

A prerequisite for participating in the co-operative tax compliance programme is the taxpayer's implementation of internal Tax Control Framework (TCF) procedures, which detail the tax strategy, including tax risk, risk appetite, and clear tax planning objectives (OECD, 2016). A self-control mechanism deemed effective by the tax authority, combined with the conviction regarding the reliability of the disclosed information on tax risks, provides a basis for reducing the number of audits, inspections, and reporting requirements (OECD, 2016).

The result of such co-operation is the reduction of information asymmetry, which most commonly stems from tax planning or differing interpretations of regulations applied to specific business events (Eberhartinger, 2021). Mitigating this asymmetry reduces the costs of performing the fiscal function and serves the interest of the state.

Taxpayers who wish to comply with the law and expect high-quality services in return join the co-operative tax compliance programme voluntarily (De Widt, 2024). Experiences from the programme's implementation indicate that these participants are typically corporations employing advanced tax risk management processes and pursuing less risky tax strategies (Eberhartinger, 2021). The decision to enter into a co-operative relationship is the result of a rational cost-benefit analysis regarding risky tax optimization.

Tax systems, the structures of specific taxes, and the mechanisms for tax control and enforcement vary across different countries (OECD, 2013). A natural consequence of these differences is the variation in the specific details of co-operative tax compliance programmes, such as the eligibility criteria for participation, the scope of disclosed information, the party initiating the entry into the programme, and the fulfillment of additional conditions.

Some countries exclude high-risk taxpayers from the programme, while in others, the programme is dedicated specifically to key taxpayers. The most advanced and widely adopted version of co-operative tax compliance is the Dutch Horizontal Monitoring (HM) model – a compliance model preferred by the OECD as a benchmark example of such a programme.

The application of the horizontal monitoring model yields mutual, measurable individual and social benefits (OECD, 2013). The social benefit lies in the expected long-term increase in tax revenues for the state budget and the promotion of voluntary compliance attitudes.

The benefits for the tax authority are associated with the rational use of limited personnel resources, reduced administrative costs due to the taxpayer's involvement in the self-control process, a decrease in conflict situations resolved in court, and the creation of a positive image of a state authority oriented toward business understanding and taxpayer assistance. On the taxpayer's side, the most significant universal benefits – regardless of the agreement model or tax residence – include the

mitigation of uncertainty, a reduction in administrative costs related to a lower frequency of tax audits, and an improved corporate image and prestige.

The informal nature of the relationships and the privileges granted to programme participants have raised public concerns regarding the potential undermining of the principle of tax justice – concerns that are countered by rational argumentation (Huiskers-Stoop, 2019).

A programme participant does not receive a benefit in the form of a reduced tax burden; rather, the privileges serve as compensation for the costs incurred in implementing the self-control system and the taxpayer's additional obligations.

Such participants are in a different position than others because they provide full information to the tax administration and execute a self-control plan, thereby reducing the burden on tax authorities, which justifies their privileged treatment (Burzec, 2024). The legislator's task is to structure the rules of the co-operative tax compliance programme so that, on one hand, excessive regulation does not undermine the informal nature of the relationship and mutual trust, while on the other, it does not arouse mistrust among other taxpayers (De Widt, 2024).

Preserving the principle of tax equality remains contingent upon the professionalism and impartiality of tax officials in assessing the information received and the associated tax risks (OECD, 2016). The state, meanwhile, must be certain that the taxpayer's privileges are proportionate to the programme's objectives (Majdańska, 2019).

#### **4. Assumptions of the Co-operative Tax Compliance (CTC) Programme in Poland**

The Co-operative Tax Compliance Programme, introduced in Poland in 2020 through an amendment to the Tax Ordinance Act, is the equivalent of the Dutch Horizontal Monitoring model, adapted to Polish socio-economic conditions, the legal system, and historical context (Ustawa, 2025; Rządowy, 2019). The first co-operation agreements were signed in 2022. The agreement is entered into voluntarily for an indefinite period and may be terminated by either party.

The objective of the programme is to ensure the taxpayer's compliance with the law under conditions of mutual trust, transparency, and the tax authority's understanding of the specific nature of the business activity (Ustawa, Art. 20 § 2). Participation in the programme may be initiated by either party, provided that the tax authority decides whether to grant consent to the agreement and may withdraw from it if the taxpayer fails to fulfill its terms.

Acceptance is contingent upon a positive result of a preliminary audit, which assesses the maturity of the taxpayer's self-control mechanisms, the execution of the

tax function, as well as the prior reliability of filed tax returns and an attitude demonstrating credibility and a willingness to comply with regulations.

The programme is designed for large taxpayers with annual net revenues exceeding 50 million EUR – entities of key economic importance, capable of implementing internal control mechanisms and possessing the human, material, and financial resources to maintain the tax function's control system, while simultaneously being the most susceptible to aggressive tax optimization (Rządowy, 2019; Pałys, 2021).

The agreement imposes general obligations on the taxpayer, which include: the commitment to the timely payment of correctly determined tax, the maintenance of a Tax Control Framework (TCF) agreed upon with the tax authority, the voluntary disclosure – without prior request – of all significant tax issues that could lead to a discrepancy in positions between the taxpayer and the authority, and the provision of any information that could impact the attainment of a tax benefit (Ustawa, Art. 20u).

Cooperation under the agreement is characterized by the tax authority's individualized approach toward the taxpayer, in accordance with the principle of proportionality – namely, the adequacy of the frequency and scope of audit activities (Ustawa, Art. 20v).

The level of supervision is contingent upon the taxpayer's ethics and organizational culture, both of which are verified through monitoring audits throughout the duration of the agreement.

The agreement further provides for the possibility of the programme participant entering into a tax agreement or an investment agreement with the tax authority regarding the resolution of disputed or doubtful issues, involving the mutual alignment of tax law interpretations (Ustawa, Art. 20zb).

A tax agreement may concern the interpretation of legal provisions, advance pricing agreements (APA), or the amount of simplified CIT (Corporate Income Tax) prepayments. In turn, an investment agreement may pertain to the interpretation of the tax consequences of planned or ongoing investments.

Tangible benefits for Polish taxpayers participating in the programme include a 50% reduction in the fee for entering into an Advance Pricing Agreement (APA), the eligibility to apply for the privilege of simplified corporate income tax prepayments, and the reduction or non-accrual of interest on certain tax arrears.

Furthermore, participants may be exempted from default interest on specific incorrectly calculated tax liabilities and receive priority treatment regarding tax overpayment refunds and tax proceedings initiated at the taxpayer's request (Katalog 2023; Ustawa, Art. 20zc).

## 5. Characteristics of Companies Participating in the Co-operative Tax Compliance Programme

By mid-2025, fifteen entities had signed a co-operation agreement to join the programme, fourteen of which were subjected to analysis (Table 1). The majority of these are part of multinational corporations and possess both domestic and foreign subsidiaries. One of the entities is a State-Owned Enterprise (SOE), while six companies are funded exclusively by Polish capital. Two companies operate within a Special Economic Zone (SEZ). In terms of the nature of their business activities, manufacturing and trading enterprises are the most predominant.

The group of co-operative tax compliance programme participants includes companies that significantly exceed the required revenue threshold, with 2024 revenues ranging from EUR 307 million to EUR 16,312 million (PLN 1.3 billion to PLN 69 billion, based on the NBP exchange rate of EUR 1 = PLN 4.23 effective December 29, 2025). In terms of revenue volume and sales profitability, the programme participants are leaders in their respective industries.

They hold assets valued between EUR 95 million and EUR 4,019 million (PLN 400 million to PLN 17 billion) and equity ranging from EUR 35 million to EUR 2,364 million (PLN 150 million to PLN 10 billion). Only three out of the fourteen entities incurred a loss in 2024, while the remaining companies achieved a net profit. Most of these companies operate in concentrated markets, where the five largest competitors hold significant market shares, each exceeding 10% (Sprawozdania, 2024).

The assessment of a company's creditworthiness is of paramount importance for building mutual trust. The highest creditworthiness rating, 'A', is held by 43% of the companies, while three companies received a 'B' rating (high creditworthiness), and 35% of the entities were assessed at a moderate creditworthiness level. These high ratings are attributed, among other factors, to a secure level of debt; in over 60% of the entities, the share of external capital in total capital does not exceed 50%.

The second factor shaping the creditworthiness assessment is insolvency risk, interpreted as the percentage probability of a company closing due to bankruptcy or restructuring proceedings within the next two consecutive years. In all analyzed entities, the insolvency risk is negligible, remaining below 1%, and for half of the companies, this risk is even lower than 0.1%.

All entities participating in the programme paid Corporate Income Tax (CIT) in 2024, with one-third of them contributing more than EUR 23 million (PLN 100 million) each to the state budget. For the majority of the analyzed entities, CIT represents between 17% and 21% of their gross profit. Given the nominal tax rate of 19%, this indicates only minor adjustments of the accounting result for expenses non-deductible for tax purposes.

Two companies conducted trade transactions with non-European contractors (Informacja, 2024). In 2024, none of the companies carried out settlements in jurisdictions practicing harmful tax competition. One-third of the companies submitted requests for individual tax rulings, most frequently concerning Value Added Tax (VAT) and excise tax (Informacja, 2024).

## **6. Conclusion**

Factors that significantly increase tax non-compliance risk and the need for its mitigation include transactions with foreign related parties and expansion into international markets, including those beyond Europe.

Companies participating in the Co-operative Tax Compliance Program, most of which belong to international capital groups, are characterized by significant economic potential as measured by revenue, asset value, equity, and corporate income tax (CIT) paid.

The complexity of legal application is evidenced by the fact that one-third of the studied entities applied for individual tax rulings, more frequently concerning VAT and excise duty than income tax. Reports on implemented tax strategies indicate that companies engaging in transactions in non-European markets are most concerned about the risk of conflict with tax authorities arising from divergent interpretations of regulations.

All analyzed companies reliably fulfilled their tax obligations and are considered highly credible; their insolvency risk is negligible. This confirms European experience, which indicates a greater inclination toward open cooperation and transparency among entities in sound financial health, characterized by a large scale and wide scope of business operations.

Such entities value tax certainty and a strong reputation, perceiving greater benefits from cooperation than from risky tax optimization. The mutually agreed-upon Co-operative Tax Compliance Program is a manifestation of taxpayers' prudence in mitigating tax risk and a strategic utilization of the privileges guaranteed to its participants.

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**Table 1. Characteristics of companies participating in the co-operative tax compliance programme in Poland, data for 2024.**

Company No. / Sector	Revenue (PLN million) *	Total Assets (PLN million) *	Gross profit (PLN million) *	CIT (PLN million) *	Net profit/loss (PLN million) *	Debt ratio (%)	Bankruptcy risk (%)	Credit Rating	Net margin higher than x% of industry peers	Revenue higher than x% of industry peers	Market share (%)
1. Timber wholesale	1 266	401,1	12,1	3,6	8,57	48	0,12	B	32	100	2,0
2. Manufacturer of plastic products	3 151	1 889	- 19,8	3,3	- 23,2	40	0,15	B	34	99	20,0
3. Manufacturer of wood-based panels	1 291	1 940	10,3	12,5	- 2,2	18	0,06	C	30	95	9,0
4. Wholesale of fruit and vegetables	2 201	439,7	15,2	3,0	12,2	67	0,10	B	40	100	8,0
5. Wholesale of tobacco products	17 422	3 027	896,5	157,8	738,6	81	0,26	C	87	9	50,0
6. Construction of roads and motorways	9 398	7 816	n.a.	0,2	623,6	84	0,41	C	49	100	20,0
7. Sugar producer	5 771	8 557	388,1	69,7	318,4	26	0,06	A	50	80	60,0
8. Meat products manufacturer	12 174	4 378	408,1	70,8	337,3	44	0,04	A	48	99	30,0
9. Cement manufacturer	2 492	3 732	822,7	154,6	668,1	26	0,03	A	82	95	30,0
10. Wholesale of clothing	20 440	17 501	n.a.	504	1 747	70	0,34	C	78	100	50,0
11. Gambling and betting activities	69 208	3 316	601,8	123,3	478,5	44	0,04	A	47	98	80,0
12. Wholesale of tyres	1 499	475,7	33,9	7,1	26,9	39	0,03	A	54	99	6,0
13. Bus and coach manufacturer	2 300	1 817	-296,0	22,2	- 318,2	91	0,68	C	n.a.	n.a.	n.a.

14. Packaging manufacturer	14 488	17 000	2 094	457,6	1 637	41	0,04	A	58	100	7,0
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**Note:** \* Financial data converted from PLN to EUR using the National Bank of Poland (NBP) average exchange rate of 1 EUR = 4.23 PLN (Exchange Rate Table No. 249/A/NBP/2025, dated December 29, 2025, available at: <https://nbp.pl/statystyka-i-sprawozdawczosc/kursy/tabela-a/>).

“n.a.” denotes data not available.

**Source:** Sprawozdania finansowe KRS (2025), BizRaport, <https://www.bizraport.pl/>.