

FY2015 CALCULATION OF CORPORATE INCOME TAX		
ON Semiconductor Slovakia, a.s. ("The Company")		
(EUR)		
Total costs	11 267 347,06	
Total revenues	12 126 140,13	
Accounting profit	858 793,07	
<b>Items increasing tax base</b>		
Account	Description	Amount
50140	We understand that fuel consumption is used for the private use of Company's employees. Due to this fact entire amount of fuel expenses represents tax non-deductible costs.	49 816,96
51310	Representation costs are treated as tax non-deductible expenses in 2015.	81 312,79
54310	Donations given by the Company are treated as tax non-deductible costs.	3 000,00
32310 45910	Creation of accruals for items (bonuses, unbilled supplies, travel expenses, air tickets, etc.) which are treated in 2015 as tax non-deductible items increasing the Company's tax base.	724 547,69
51860	Accounting and legal advisory services which have not been paid by the Company until 31 December 2015 are treated as tax non deductible cost. These expenses should be treated as item decreasing the tax base in future tax periods after their payment.	3 787,50
54120	We understand that the Company sold construction land in 2015. The difference between higher tax book value (EUR 2,383.25) and lower sale price (EUR 100.00) in total amount of EUR 2,283.25 represents an item increasing the Company's tax base in 2015.	2 283,25
S54610	Write-off of receivables towards employees where no documentation was kept by the company. Therefore the amount of EUR 2,124.93 should be treated as tax non-deductible cost.	2 124,93
54410	Contractual fines and penalties are treated as tax non-deductible expense in 2015.	20,79
55120 55140 55143 55145	We understand that the Company decided to interrupt tax depreciation of fixed tangible assets (with acquisition price higher than EUR 1,700) in total amount of EUR 688,015.33 in 2015. Therefore, the difference between higher accounting depreciation of fixed assets and zero tax depreciation of tangible fixed assets amounting EUR 324,242.94 represents the item increasing Company's tax base in 2015. Depretiation of low value fixed assets in the amount of EUR 1,103.66 and intangible assets in the amount of EUR 2,518,33 were treated as tax deductible expenses (up to maximal amount of respective accounting depreciation) as no interruption of tax depreciation is possible for these categories of assets.	324 242,94
51870	The loss from services relating the distribution of meal in own canteen is tax deductible only to 55%. Therefore, we treated 45% of total costs decreased by total revenues generated from canteen amounting EUR 5,268.15 as tax non-deductible.	5 268,15
<b>Total</b>		<b>1 196 405,00</b>
<b>Items decreasing tax base</b>		
Account	Description	Amount
66220	We understand that the full statutory account No. 66220 in the amount of EUR 18.65 represents interest income from the bank deposits. According to Slovak tax law, withheld tax on bank interest is treated as settled tax and such income is not subject to taxation.	18,65
32310 45910	Release of accruals treated as tax non-deductible in previous tax periods represents item decreasing the Company's tax base.	543 950,00
54120	The difference between lower net book value (EUR 0.00) and higher tax residual value (EUR 17,872.72) of disposed (sold) fixed assets in total amount of EUR 17,872.72 is considered as an item decreasing Company's tax base in 2015.	17 872,72
09210 09220	Release of provisions to fixed tangible assets (we understand that their creation in previous tax periods was treated as tax non-deductible) represents an item decreasing the Company's tax base in 2015.	5 057,36
<b>Total</b>		<b>566 898,73</b>
<b>Tax base</b>		<b>1 488 299,34</b>
<b>Potential utilization of tax losses</b>		<b>-3 388 135,37</b>
<b>Adjusted tax base</b>		<b>0,00</b>
Tax rate		22%
<b>Tax liability (rounded down to nearest eurocent)</b>		<b>0,00</b>
<b>Tax license</b>		<b>2 880,00</b>
Corporate income tax advances paid in 2015		0,00
Withholding tax which is considered as a tax advance		0,00
<b>Tax due (+) / Tax overpayment (-)</b>		<b>2 880,00</b>
<b>Tax for the purposes of corporate income tax advances for FY16 according to § 42</b>		<b>0,00</b>