



NS Solutions IT Consulting Europe Ltd.

TAX STRATEGY FOR NS SOLUTIONS IT CONSULTING EUROPE LTD. FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2020

March 2021

NS Solutions IT Consulting Europe Ltd., a limited company registered in England and Wales, is wholly owned by NS Solutions Corporation. NS Solutions Corporation is incorporated and tax resident in Japan, headquartered in Tokyo.

The overall group is engaged in various businesses within the information technology industry including provision of consultation on business and information systems; plan, design, develop, implement, operate and maintain information systems; develop, manufacture and sales of software and hardware; and provision of outsourcing services using information technology.

NS Solutions IT Consulting Europe Ltd. provides clients in the UK with financial IT (Information Technology) system consulting services, IT business analysis, and system design.

This strategy applies to NS Solutions IT Consulting Europe Ltd., and it is regarded that this publication complies with the duty under paragraphs 16 and 19 of Schedule 19 to the Finance Act 2016. In this report, references to “the Company” are to NS Solutions IT Consulting Europe Ltd., the UK entity.

The Company’s tax strategy and policy comprises four key components:

Compliance and governance

The group is committed to compliance with tax law and practice in the UK. It complies with all statutory obligations and discloses all relevant facts and circumstances to the tax authorities.

The ultimate responsibility for the Company’s UK tax strategy and compliance rests with the Board of the Company. The executive management of the Company is delegated by the Board to the Managing Director of NS Solutions IT Consulting Europe Ltd. The Board’s responsibility to monitor the integrity of the Company’s financial reporting system, internal

controls and risk management framework, expressly includes those elements relating to taxation.

Day-to-day management of the Company's UK tax affairs is delegated to the administration team comprised of internal and external individuals who are appropriately qualified. The administration team report to the Managing Director of the Company. For complex issues, advice is sought from external advisers

Managing tax risks

The Company actively seeks to identify, evaluate, monitor and manage risks in relation to the interpretation of complex tax law and compliance arrangements to ensure it remains in line with our objectives.

As a component of the overall internal control framework applicable to the Company's financial reporting system, the Company operates a system of tax risk assessment and control. It seeks to reduce the level of tax risk arising from the Company's operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations.

Processes relating to different taxes are allocated to appropriate process owners, who carry out a review of activities and processes to identify key risks and mitigating controls in place. These key risks are monitored for business and legislative changes which may impact and changes to processes or controls are made when required.

Where there is significant uncertainty or complexity in relation to a risk, external advice may be sought.

In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks, including tax risks, which need to be addressed and for determining what actions should be taken to manage those risks, having regard to the materiality of the amounts and obligations in question.

Attitude towards tax planning and level of risk

The Company's attitude towards tax planning is consistent with the group's global code of business conduct "NSSOL Group Global Code Of Business Conduct" set out in the website link <https://www.nssol.nipponsteel.com/en/corporate/conduct.html>

When entering into commercial transactions, the Company seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation. Amongst other factors, the tax laws of the countries in which the Company operates are considered, with a view to maximising value on a sustainable basis for the ultimate

shareholders and employees.

Any structuring that is and will be undertaken has commercial and economic substance with full regard to the potential impact on the group's reputation and broader goals. The Company will not put in place any arrangements that are contrived or artificial.

The level of risk which the Board accepts in relation to UK taxation is consistent with its overall objective of achieving certainty in the group's tax affairs. At all times the Company seeks to comply fully with its regulatory and other obligations and to act in a way which upholds its reputation as a responsible corporate citizen.

Working with HM Revenue & Customs

The Company engages with HM Revenue & Customs ("HMRC") with honesty, integrity, respect and fairness and in a spirit of co-operative compliance. It seeks to have a transparent and constructive relationship with HMRC through regular communication in respect of developments in the Company's business, current, future and retrospective tax risks, and interpretation of the law in relation to all relevant taxes.

HMRC is and will be informed of significant transactions and changes in the business, seeking to discuss any tax issues arising at an early stage. All relevant facts are disclosed and any transactions or issues with potential for the tax treatment to be uncertain are identified, when submitting tax computations and returns to HMRC. Any inadvertent errors in submissions made to HMRC are and will be fully disclosed as soon as reasonably practicable after they are identified.