

## NS United Kaiun Group - Our Approach to UK Taxation

### Introduction

NS United Kaiun Group (hereafter “the Group”) is a multi-national enterprises group providing high-quality marine transportation services.

NS United Shipping (U.K.) Ltd. is the only subsidiary based in United Kingdom, owned and controlled by the Group.

This document has been prepared to meet the requirements of paragraph 19 (2) of Schedule 19 of the UK Finance Act 2016, and to be effective for the financial year ending March 31, 2023.

#### I. Risk management and governance arrangements in relation to UK taxation

Based on the "NS UNITED KAIUN GROUP Corporate Philosophy", our group has established a “Code of Conduct” and “Internal Control Basic Policy”, and applies the relevant provisions to tax operations in each country, including the United Kingdom. The following provisions are stipulated in the “Code of Conduct” and the “Internal Control Basic Policy” regarding tax operations.

#### Code of Conduct

- I. Comply with laws and regulations domestically and overseas and act in accordance with social norms and the Group Corporate Philosophy.
- II. Do not offer any bribes or give unfair profits, or make an illegal offer and promises to civil servants.
- III. Endeavor to organize account records and vouchers adequately for appropriate accounting and tax processing
- IV. Consult with a Rules of Compliance consultation system without delay in case of encounter suspicious behavior or a possible violation of the Code of Conduct

#### Internal Control Basic Policy

- I. Regulations and systems for managing the risk of loss of the Company
- II. System to ensure the appropriateness of operations in the corporate group consisting of the Company and its subsidiaries

Considering the above provisions, we carry out tax-related operations at our business bases around the world, including the United Kingdom. Double

taxation is an example of a common risk in the Group's business structure. In accordance with the Risk Management Regulations, the Finance and Accounting group will consider countermeasure for such risks, and that will be discussed, decided, or reported to each committee, the Board of Executive Officers, and the Board of Directors. Regarding tax risks that have a significant impact on business, the Executive Officers Committee and the Board of Directors will be the organization to deal with, and the president and directors will be responsible for them.

2. Attitude to tax planning as far as UK taxation

In connection with future business plans, the Group may use tax planning within the scope of tax laws and accounting standards to estimate the amount of tax payments in advance in order to plan cash flow and to stabilize financial indicators. We will have expert advice when we need a precise interpretation of each provision of Tax laws and judicial precedents. To prepare a tax planning, we take a conservative approach based on income calculated from future business plans.

3. The acceptable level of risk for UK taxation

As business structures become more complicated and diversified, tax management is also becoming more specialized. In this complicated taxation process, there is a risk of additional taxes due to tax return errors and/or delays, and we believe that it is difficult to eliminate this risk completely.

For this reason, the Group will make efforts to reduce risks by considering the impact of tax risks in advance from the following perspectives.

- We assess tax risks on a case-by-case basis and take lawful and reasonable measures in each case.
- Prices applicable to transactions within the Group, including the United Kingdom, are calculated in accordance with the relevant laws and regulations of each country or region and the arm's length principle.
- In order to maximize the shareholder's value of our group, we will make appropriate and effective use of tax relief measures. We will not intend to avoid tax through interpretation or application that deviates from the purpose of laws and regulations.

#### 4. Approach towards HMRC

In accordance with the Code of Conduct, we will cooperate with HMRC as follows on the premise that we do not offer any bribes or give unfair profits, or make an illegal offer and promises to civil servants including those in the United Kingdom.

- We will interpret relevant laws and regulations rationally and file all tax returns accordingly.
- We will respond to requests for information from HMRC in a timely manner.
- If a dispute arises with HMRC, we will endeavor to resolve it in a timely manner. If we have a disagreement with them, we will work with them to resolve the issue, except in case of filing an appeal against their actions or views.