UK-NSI Co. Ltd.

UK-NSI Tax Strategy

This paper sets out the tax strategy of UK-NSI Co Ltd and in making this strategy available UK-NSI Co Ltd is fulfilling its responsibilities under Schedule 19 of the Finance Act 2016.

This tax strategy applies to UK-NSI Co Ltd and the document is owned by the Board of Directors of UK-NSI Co Ltd ("the Board"). It will be reviewed annually, updated as appropriate and approved by the Board. The Board is responsible for setting and monitoring the strategy. The finance team of the UK-NSI Co Ltd are accountable to the Board for the implementation of the tax strategy and the management of tax and related risk.

Our tax strategy reflects our status as a UK Limited company and is part of the Nippon Seiki Group which requires strong governance and consideration of the groups reputation,

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How UK-NSI Co Ltd manages its tax risks and levels the risk the company are prepared to accept.

UK-NSI Co Ltd on-going approach to UK tax risk management and governance is based on the principles of reasonable care and materiality. UK-NSI Co Ltd maintains on-going application of tax governance with strong internal controls in order to substantially reduce tax risk to materially acceptable levels.

UK-NSI's finance team works closely with a professional external advisers that monitors ongoing taxation compliances and reviews with UK-NSI on a regular basis.

UK-NSI's attitude to tax planning

UK-NSI Co Ltd will not engage in artificial transactions the sole purpose of which is to reduce UK tax. However, it will consider undertaking a transaction in a way that gives rise to UK tax efficiencies providing this is aligned to the group's commercial objectives as detailed above and complies with the associated UK tax legislation. The UK Group will not engage in tax efficiencies if the underlying commercial objectives do not support the position, or if the arrangements impact upon UK-NSI Co Ltd or Nippon Seiki group's reputation, brand, corporate and social responsibilities, or future working relationships with HMRC.

UK-NSI Co Ltd will seek to:

- (a) submit the UK tax returns on a timely basis, including sufficient detail to enable HMRC to form an accurate view of the affairs of the company filing the return with an adequate supporting audit trail and sign-off process,
- (b) pay the appropriate amount of tax at the right time. Where this view may differ to the position taken by HMRC, UK-NSI Co Ltd aims to be transparent about the filing position it has taken,
- (c) maintain tax accounting arrangements which are robust and accurate and comply with

Working with HMRC

UK-NSI Co Ltd will comply with all relevant legal disclosure and approval requirements and all information will be clearly presented to HMRC as appropriate. In its dealings with HMRC, UK-NSI Co Ltd will act in an open, honest and transparent manner. UK-NSI Co Ltd strategic

aim is to avoid unnecessary disputes with HMRC and thus minimise tax risk through timely and accurate information provided to HMRC.

This Tax Strategy document is available on the company website and will be subject to continuous review by "the board" to ensure that UK-NSI Co Ltd is adhering to its strategic aims and objectives.

Kiyokazu Muto Managing Director UK-NSI Co. Ltd.

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