

## Ushio U.K. Ltd Tax Strategy

### Introduction

Since its inception in 1964, USHIO has garnered a worldwide reputation as the specialist in industrial light sources. Covering the entire light spectrum from Ultraviolet to Infrared, USHIO solutions can be found in diverse range of products from cinema screens and water dispensers to life-saving medical devices and are used in the production of the latest smartphones and the testing phase of space exploration. USHIO is proud to contribute to a more advanced, happier and healthier society.

### Ushio U.K. Ltd Tax Strategy

This document is to satisfy the requirements under Section 161 and Schedule 19 (2) of the UK Finance Act 2016 that qualifying UK companies must publish details of their Tax Strategy, either on their web-site or in a freely available document. This requirement applies to UK groups even if they are part of a multi-national group. Ushio U.K. Ltd. are wholly owned by Ushio Europe B.V. a company incorporated in the Netherlands. Ushio Europe B.V. has a strong focus on corporate responsibility including the management and compliance of taxation. It's global tax policies are available on its website:

<http://www.ushio.eu/UKTaxStrategy> and <http://www.ushio.co.jp>

### Tax risk management

Ushio U.K.Ltd's overall tax strategy is to ensure that:

- Tax risks are managed in an established and robust way
- All tax legal requirements including tax compliance and reporting responsibilities are fully met
- Tax reliefs and incentives where available are utilised consistent with the aim of the legislation
- All tax processes are documented and key controls identified
- Transactional taxes such as VAT are managed through the functionality of its IT systems
- Tax impacts are always considered when implementing business decisions, including reorganisations and restructuring
- Identified tax risks are managed by robust controls developed to meet the HMRC Senior Accounting Officer regime
- Tax policies are developed in key areas such as BEPS reporting and Transfer Pricing

### Key roles and responsibilities

In the management of its tax affairs Ushio U.K. Ltd has identified the following key roles and responsibilities:

- The Ushio U.K. Ltd. CFO has ultimate responsibility for the tax affairs.
- The Finance Controller manages tax on an ongoing basis within his/her wider Finance roles
- The Accounts Payable are responsible for tax processes and have extensive experience of VAT requirements
- Where deemed appropriate professional tax advisors are engaged to support those with responsibilities above

### Information on systems and controls to manage tax risks in the UK

Where available IT functionality is utilised to manage transactional taxes such as VAT and this is reviewed and tested on a regular basis.

External tax advisors are engaged to support the management of Corporate Tax, including the submission of returns.

### Attitude to tax planning

Ushio U.K. Ltd does not actively seek tax planning structures. Where an assessment of tax impacts is undertaken the preferred option is to adopt an approach with a low tax risk.

### Why we might seek external tax advice

External tax advice is sought where a second opinion is beneficial in explaining a difficult tax issue.

### Working with HMRC

We have an open relationship with the HMRC Client Relationship Manager and the HMRC Large Business team with whom we have regular communications. HMRC are consulted where clarification is required to tax questions or interpretations in the UK.

Version: July 2018