

MISI UK Tax Strategy

This UK tax strategy applies to the UK branch of Marubeni Itochu Steel Europe GmbH, Marubeni Itochu Tubulars PLC, Barclay & Mathieson Limited, Avon Steel Company Limited, Breal Capital (Pulman) Holdings Limited and Abram Pulman & Sons Limited (collectively, the “UK group”). The ultimate parent of the UK sub-group is Marubeni Itochu Steel Inc. (“MISI”), incorporated in Japan.

UK Tax Risk Management and Governance

- Responsibility for MISI Group tax governance lies with the Corporate Administration Division of Marubeni-Itochu Steel Inc. (“MISI”) as part of MISI Group’s finance function.
- Tax related operations are handled by the respective tax departments of MISI and the MISI Group companies. Tax risks and operations that affect MISI Group as a whole, including the UK group, are managed by MISI’s accounting department.
- We are supported as necessary by tax and legal professionals where issues related to our tax positions or treatments are unclear.
- We strive to reduce tax uncertainty in each jurisdiction we operate in, including the UK, by utilizing methods including advance consultations with the tax authorities.

Attitude Towards Tax Planning (As It Affects UK Tax)

- All MISI Group tax planning in the UK and elsewhere is performed in accordance with applicable tax laws and regulations, and follows a specific business purpose.
- We do not undertake any tax planning initiatives that are not aligned to business operations.
- In the course of our usual business activities, MISI Group may utilize available beneficial tax incentives to maximize shareholder value through tax efficiencies.
- While beneficial tax incentives may impact our decision making process in respect of business operations, they are only one of the economic factors we consider.

Acceptable Level of UK Tax Risk

- As part of our global management framework, aiming to maximize shareholder value and minimize our tax risks, we strive to appropriately respond to changes in tax laws and regulations.
- Based on a low tax-risk appetite, we aim to pay the appropriate amount of tax in the appropriate jurisdictions based on the value generated through our activities. This includes the UK.

Approach of the Group Towards its Dealings with HMRC

- MISI Group strives to maintain a positive relationship through our communications with HMRC and sincere responses to any inquiries raised
- We also make all attempts to resolve any disagreements in opinion with the tax authorities of each jurisdiction we operate in, if they arise, through direct communication. In addition, we investigate the causes of issues that may arise and put in place the appropriate mechanisms to prevent their reoccurrence.
- MISI Group observes the applicable tax laws and regulations of each jurisdiction we operate in and makes appropriate tax payments globally.

The publication of this strategy statement is regarded as satisfying the requirements under Paragraph 22(2), Schedule 19, Finance Act 2016. The tax strategy statement was published on 1st April, 2024.

Marubeni-Itochu Steel Inc.

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