Europe Finance
UK Tax Strategy Local Sub-Master Policy

Definitions

"Company" means Fujitsu Limited and relevant Fujitsu Group companies.
"Organization" means a unit that carries out quality activities in business and operations. This includes divisions, companies, and units covering multiple companies such as regions.
"Employees" mean directors, officers, and employees of the Company.
"Products and services" mean the following:
(1) Products and services (including system integration, professional services, etc.), their accompanying items, and the facilities required to provide the services.
(2) Internal IT systems built within each Company, and their operations and maintenance

Sub-Master Policy Statement

Introduction

The Fujitsu UK Tax Strategy applies to Fujitsu Services Holdings PLC and its UK subsidiaries, Fujitsu Europe Holding B.V.'s UK subsidiaries, Fsas Technologies Limited and all other subsidiary companies of Fujitsu Limited, whether directly or indirectly held, that have been incorporated in the UK (together referred to as "Fujitsu UK"). This document, approved by the Board / senior management of each entity of Fujitsu UK, sets out the strategic tax objectives and approach adopted when conducting tax affairs and dealing with tax risk.

Fujitsu UK's tax strategy is aligned with the Fujitsu Europe Tax Policy, Fujitsu Group Tax Policy and Fujitsu Europe Finance Guidance on Tax Risk Management which are reviewed annually. The SVP, Head of International Finance and Head of Europe Finance and the Head of Tax Europe are responsible for management of the tax affairs of Fujitsu Europe. The Fujitsu subsidiaries which are located in the UK but not part of the Fujitsu Europe have adopted the Fujitsu Europe Tax policies to the extent that these are mentioned below in this document. This strategy is effective from the date of publication until it is superseded.

Fujitsu Europe Tax Policy

Fujitsu Europe believes that effective tax governance represents an opportunity to integrate tax into strategic planning in order to build corporate value for the benefit of shareholders and other stakeholders.

The impact of tax on earnings and the director's duty to maximize shareholders value are recognized together with Fujitsu's Global Business Standards ('Fujitsu Way') and Fujitsu´s approach to tax matters which was published in Sustainability Data Book 2025. Fujitsu UK recognizes that it is, first and foremost, a member of society, not just an organization. As a responsible member of society, Fujitsu UK conducts its tax affairs based on the principles of regulatory compliance, sound ethics and integrity, in order to preserve and enhance the company´s reputation.

Within the Fujitsu Europe Tax Policy, we set out the principles of tax strategy and tax planning and we define the Fujitsu Europe Tax team's role in putting these objectives into practice in daily business routine.

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The main aim of the tax strategy is to reflect and to support business and commercial strategy by complying with the tax laws, ensuring a sustainable tax rate and mitigating tax risks in a timely and cost-efficient manner.

Fujitsu Europe Tax Code of Conduct

The Europe Group Tax Code of Conduct outlines the principles setting out how relevant individuals are expected to operate with respect to tax matters in support of the above Fujitsu Europe Tax Policy. Any non-adherence to the Code of Conduct may be subject to disciplinary proceedings.

a. Business climate: taxpayer morale

- Fujitsu Europe promotes and strives for ethical and transparent business practices.
- Fujitsu Europe ensures that all tax decisions are accompanied by due consideration to its corporate and social responsibilities.
- Fujitsu Europe does not use any artificial tax structure or so called "tax haven" jurisdiction for the sole purpose of reducing or avoiding tax burden.

b. Compliance and reporting principles

- Fujitsu Europe respects and complies with all applicable tax laws, treaties, government regulations and statutes and customs in every jurisdiction it operates, as well as other guidelines such as those laid out in the Business Erosion and Profit Shifting (BEPS) project led by the OECD. Violating laws or regulations, even when motivated by a misguided devotion to the organization, is unacceptable.
- Fujitsu Europe endeavors to understand all relevant tax laws and regulations prior to initiating any business.
- Fujitsu Europe builds awareness and systematically updates a knowledge pool of tax rules and disclosure requirements applicable in every jurisdiction it operates.

c. Relationship with tax authorities / governments

- Fujitsu Europe builds and maintains an open, transparent and honest relationship with tax authorities about its tax affairs. Fujitsu Europe will regularly report its Tax Policy in an understandable and transparent way.
- Fujitsu Europe provides relevant and straightforward information to tax authorities to facilitate understanding of its tax strategy and underlying business models.
- Fujitsu Europe seeks tax rulings from tax authorities only to confirm applicable tax treatment by transparent disclosure of all facts.

d. Transfer pricing policy

- Fujitsu Europe ensures that its transfer pricing policies comply with the current OECD guidelines.
- Fujitsu Europe applies arm´s length principle to determine any transfer price within the Fujitsu Group, thus ensures that the appropriate income is reported in the jurisdiction where the value is created.

e. Tax planning principles

- Fujitsu Europe uses tax planning to support and ethically align business operation with the tax laws, therefore not to use secrecy jurisdictions or so-called "tax havens" solely for tax avoidance, nor artificial tax structures that have no commercial or operational substance.
- Fujitsu Europe evaluates tax planning opportunities within clear risk parameters (further information on Finance Guidance on Tax Risk Management).

Fujitsu Europe Tax Risk Management Principals

The objective of tax risk management in Fujitsu Europe is to identify, assess and reduce tax risk to an acceptable level. Tax risk management is not necessarily minimizing risk.

Businesses make profits by taking risks and a no-risk strategy is neither cost effective nor right for any business. We aim to ensure that all personnel with tax responsibilities, or whose business activities may have a tax impact, have a consistent understanding of how tax risk is identified, assessed, reported and managed.

Fujitsu UK context and relationship with HMRC

The day-to-day management of Fujitsu UK tax affairs is provided by the UK Tax team supported by Europe Tax team members as appropriate.

Fujitsu UK's appetite for risk is low and we structure transactions based on sound commercial principles and in line with the Fujitsu Europe Tax Policy and relevant tax legislation. Aggressive tax planning is not proactively considered. We obtain external professional advice where appropriate.

It is Fujitsu UK's general policy to be transparent and proactive with HMRC in all interactions with HMRC through regular meetings and communication with HMRC.

Specifically, Fujitsu UK commits to the following:

- to have an open, honest, and collaborative professional relationships with HMRC.
- to engage in full, open and early dialogue with HMRC to discuss tax planning, strategy, risks and significant transactions.
- to make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion.
- to engage in proactive discussion to bring matters to a rapid conclusion in areas in which differing legal interpretations between HMRC and Fujitsu UK occur.
- to interpret the relevant laws in a reasonable way, and ensure transactions are structured consistently with a co-operative relationship.
- to seek external tax advice only when the Fujitsu UK tax department does not have required expertise or seek confirmation of the applicability / interpretation of relevant tax legislation.

Authority and Accountability

The Policy Owner shall:

a) Ensure that all relevant Employees are aware of and, where appropriate, trained in the operation of this Policy and any changes to it.
b) Ensure that any changes to the Policy or its associated Processes are duly authorized, for example by a suitable Governance Meeting.
c) Submit a regular report on the effectiveness of this Policy to the Corporate Governance, Risk Management & Compliance Committee.
d) Ensure that Processes are specified and maintained to enable Fujitsu Europe to achieve its strategic objectives in respect of this Policy.

Local Management

The local FD is responsible for all tax reporting and adherence to this Policy. Fujitsu Europe Tax will support the local FDs. In UK the Head of Group Tax UK & Ireland is responsible for the implementation of the Policy.

Fujitsu Europe Tax

Fujitsu Europe Tax supports the local FD in implementing this Policy. It is the focal point on all tax related matters and provides systematical support to all decision makers. Fujitsu Europe Tax provides guidance and procures tax compliance services for countries which do not have an in-house Tax function and monitors the tax compliance status.

Employees
Each Employee in the organizations to which this Policy is applicable (see below – Applicability) must comply with it and with its associated Processes, which are published in the EBMS.

Any Employee found to be in breach of any Policy may be subject to disciplinary proceedings that may lead to dismissal.

Applicability

This Policy applies to Fujitsu operations in UK. This means that all Employees, Contractors, Working Partners and businesses carried on by Fujitsu Services Holdings PLC and its UK subsidiaries, Fujitsu Europe Holding B.V.'s UK subsidiaries, Fsas Technologies Limited and all other subsidiary companies of Fujitsu Limited, whether directly or indirectly held, that have been incorporated in the UK.

Scope

The Scope of the Policy covers all employees within the Company in Europe.

Related Standards, Legislation and Regulation

This Policy is designed to enable compliance in accordance with Paragraph 16(2), Schedule 19, Finance Act 2016.