

Tosoh Bioscience Ltd.

UK TAX POLICY

1. Introduction

This document sets out the tax policy of the Tosoh Group's UK subsidiary Tosoh Bioscience Ltd. and covers both direct and indirect taxes, including corporate tax, PAYE, VAT and Customs duties. As with all aspects of business conduct, Tosoh is committed to being a responsible and reasonable enterprise and therefore, it ensures that the appropriate amount of taxes are paid each year.

By disclosing its UK tax policy to all stakeholders, Tosoh is fulfilling its obligations under Schedule 19 of the Finance Act 2016.

2. Company profile

Tosoh is a Japanese group, headquartered in Tokyo, specialised in the production of chemical and specialty products. The group comprises over 100 companies in 20 different countries and has a multi-ethnic workforce of more than 12,000 people.

Tosoh's principal markets include the chemical and petrochemical, construction, automotive, consumer electronics, information technology, bioscience, and environmental markets.

With respect to Tosoh Bioscience Ltd., the company focuses solely on the "Bioscience" business unit and operates as a distributor in the UK of chromatographic columns, media and sophisticated diagnostic systems.

3. Compliance commitment

Tosoh is committed to compliance with all relevant laws, rules, regulations, and reporting and disclosure requirements wherever there is a requirement to do so following its transactions and business presence in the UK. This compliance is realised by internal governance procedures seeking to identify key tax risks and that allows the finance team to manage and mitigate those risks. In this regard, the relevant tax laws will be interpreted in a reasonable way and in line with the legislator's intention.

In view of the above, the finance team will collaborate closely with the Group's businesses to provide advice and guidance necessary to ensure compliance, hereby obtaining external advice when appropriate.

4. Responsibility

As regards tax planning, Tosoh may consider different tax outcomes when considering how to structure certain transactions and the manner of implementing business ideas. That being said, any structuring that is undertaken will have a commercial and economic purpose and will take into consideration the potential impact on Tosoh's global reputation. Tosoh will not consider any artificial arrangements, nor will it engage in tax aggressive planning that goes against the intention of the legislator.

5. Risk management

As a global enterprise, active in a variety of different business units and markets, Tosoh is subject to different risks, including tax related risks. Tosoh is committed to professional diligence and care in the management of all risks associated with tax matters. More specifically, this means that tax risks are identified, analysed and mitigated or acted upon appropriately.

In case tax risks seem complex or uncertain, appropriate written advice evidencing the facts, risks and conclusions may be taken from third party advisers to support the decision-making process. Tosoh is committed to ensure that at all times its tax position appropriately reflects the business activities it undertakes in the UK.

6. Relationship with HRMC

Tosoh believes that an open and co-operative attitude vis-à-vis the tax authorities is a determining factor in the effective management of tax risks. When a tax dispute or tax uncertainty would appear, the aim would be to strive for early agreement with HRMC on these matters, and to achieve certainty and full compliance wherever possible.

Tosoh has no pending tax litigation in the UK.

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