

## **JAPEX UK E&P LIMITED**

1 Marischal Square Centre 5038, Broad Street,  
Aberdeen, Aberdeenshire, United Kingdom

JAPEX UK E&P Limited – UK Group Tax Strategy  
Financial year ending 31 December 2020

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### **UK Group Tax Strategy**

This document is to satisfy the requirements under Section 161 and PART 2 of Schedule 19 of the UK Finance Act 2016 that qualifying UK companies need to publish details of their Tax Strategy, either on their web-site or in a freely available document. These requirements apply to a UK group even if it is a part of a multi-national group. JAPEX UK E&P Limited (JUK) is a subsidiary of Japan Petroleum Exploration Co.,Ltd.(JAPEX), a company incorporated in Japan. The principal activity of JUK is the development for hydrocarbons in the UK Continental Shelf. JAPEX is the ultimate parent company, and monitors and supports tax affairs of JUK.

### **Commitment to Compliance**

We are committed to compliance with tax law and practice in the UK. Compliance for us means paying the right amount of tax in the right place at the right time. It includes disclosing all relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where available.

### **Responsible Attitude to Arranging Our Tax Affairs**

In structuring our commercial activities, we consider – among other factors – the tax law of UK, and prepare tax planning appropriately with a low tax risk. Any structuring that is undertaken has commercial and economic substance and has full regard to the potential impact on our reputation and goals. We do not put in place any arrangements that are contrived or artificial.

### **Effective Tax Risk Management**

Given the nature of our business and complexity of tax obligations, risks would arise from time to time in relation to the interpretation of complex tax law and nature of our compliance arrangements. We actively seek to identify, evaluate, monitor and manage these risks to ensure they remain in line with our goals. Where there is significant uncertainty or complexity in relation to a risk, we may seek external advice, particularly in relation to our complex UK oil & gas tax affairs. Our directors are responsible for our tax policies and management.

### **Approach in Dealing with HM Revenue & Customs (HMRC)**

We seek to develop and maintain professional and transparent relationships with HMRC. We ensure that there is access to relevant information demonstrating the integrity of our tax processes, returns and payments.

### **Board Ownership and Oversight**

This tax strategy is approved by all Directors of JUK.