

Furukawa Electric Europe Limited Tax Strategy

This document, approved by the board of the company, sets out the company's approach to conducting its tax affairs and dealing with tax risks for the year ending 31st December 2017. In making this strategy available the company is fulfilling its responsibilities under Finance Act 2016 Schedule 19.

This tax strategy applies to all UK taxes applicable to the company and the document is owned by the Board of Directors of Furukawa Electric Europe Ltd ("the Board"). It will be reviewed annually, updated as appropriate and approved by the Board. The Board is responsible for setting and monitoring the strategy. The Chief Financial Officer of the company is accountable to the Board for the implementation of the tax strategy and the management of tax and related risk.

Furukawa Electric Europe Limited is committed to:

- Following all applicable laws and regulations relating to its tax activities.
- Maintaining an open and honest relationship with the tax authorities based on collaboration and integrity.
- Applying diligence and care in our management of the processes and procedures by which all tax related activities are undertaken, and ensuring that our tax governance is appropriate.
- Using incentives and reliefs to minimise the tax cost of conducting our business while ensuring that these reliefs are not used for purposes which are knowingly contradictory to the intent of the legislation.

Risk management

Managing the company's tax affairs is a complex process across many functional areas of the business and as such there will inevitably be risks of error or omission within those processes (Tax Risks) which may result in the incorrect application of tax rules or calculation of tax returns. Eliminating tax risks entirely is impossible, therefore the company's attitude towards the level of control required over the processes designed to reduce these Tax Risks is driven by the likelihood of occurrence and scale of impact of each Risk.

The identified Tax Risks are then assessed on a case by case basis, allowing the company to arrive at well-reasoned conclusions on how each individual Risk should be managed. Where there is uncertainty in how the relevant tax law should be applied, external advice may be sought to support the company's decision making process.

When reviewing the Tax Risks associated with a specific decision or action, the company ensures that the following are considered:

- The legal and fiduciary duties of directors and employees.
- The requirements of any related internal policies or procedures.
- The maintenance of the company's corporate reputation, having particular regard to the way we interact with the communities around us.

The company aims to (a) submit all UK tax returns on a timely basis, including sufficient detail to enable HMRC to form an accurate view of the affairs of the company filing the return with an adequate supporting audit trail and sign-off process; (b) pay the appropriate amount of tax at the right time. Where this view may differ to the position taken by HMRC, the company aims to be transparent about the filing position it has taken; (c) maintain tax accounting arrangements which are robust and accurate (d) ensure all tax filing positions are supported with appropriate documentary evidence.

Tax planning

The company has clearly defined lines of responsibility for its tax affairs, with decisions being taken in line with the company's tax authority thresholds, ensuring that they are taken at an appropriate level. The company's tax planning aims to support the commercial needs of the business by ensuring that the company's affairs are carried out in the most tax efficient manner whilst remaining compliant with all relevant laws. The tax function is therefore involved in commercial decision making processes and provides appropriate input into business proposals to ensure a clear understanding of the tax consequences of any decisions made.

In cases where the tax guidance is unclear or the company does not feel it has the necessary expert knowledge to assess the tax consequences adequately, external advice may be sought to support the company's decision making process.

Approach towards dealings with HMRC

The company is committed to the principles of openness and transparency in its approach to dealing with HMRC, and in particular the company commits to:

- Make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion.
- Seek to resolve issues with HMRC in a timely manner, and where disagreements arise work with HMRC to resolve issues by agreement where possible.
- Be open and transparent about decision-making, governance and tax planning.
- Reasonably believe that transactions are structured to give a tax result which is not inconsistent with the economic consequences (unless specific legislation anticipates that result), nor contrary to the intentions of Parliament.
- Interpret the relevant laws in a reasonable way, and ensure transactions are structured consistently.
- Ensure all interactions with HMRC are conducted in an open, collaborative and professional manner.

Signed on behalf of the Furukawa Electric Europe Limited



Mark Grimwood

Director & Chief Financial Officer