

UK Tax Strategy Publication

This UK tax strategy applies to the UK entities within KIOXIA Corporation (hereinafter referred to as “KIOXIA UK entities”) to satisfy the statutory requirements under Para 19(2), Schedule 19 of Finance Act 2016. KIOXIA UK entities are guided by the same principles as KIOXIA Corporation and follow the KIOXIA Group Standards of Conduct.

a) KIOXIA UK Entities commitment to tax compliance

In accordance with KIOXIA Group Standards of Conduct, each KIOXIA UK entity company shall manage tax matters in compliance with all applicable laws and regulations of UK, as well as to comply with guidelines published by international organisations such as Organisation for Economic Co-operation and Development (OECD).

b) The attitude of the group towards tax planning (so far as affecting UK taxation)

To comply with tax laws and regulations, we take into account taxation as a factor when making business decisions, which are made with genuine commercial and economic substance. In this regard, we would take available legal measures, such as consolidated tax filing regimes and tax incentives, and external tax advice to achieve reasonable and appropriate tax expenses from an optimal group-wide perspective.

c) The level of risk in relation to UK taxation that the group is prepared to accept

As an international business we expect to have tax risks from time to time. We look to identify, evaluate, manage and report tax risks in line with our wider approach to risk management. We seek to mitigate tax risks through an advanced assessment of transactions and evaluation of tax return filings in conjunction with the advice sought from our external tax advisors. We will also examine tax risks considering non-tax related aspects, such as reputational risk.

d) The approach of the group towards its dealings with HMRC

We will deal in an open, honest and transparent manner with HMRC in line with laws and regulations. Our explanations would be consistent from an overall KIOXIA UK Entities perspective. We will seek external guidance and advice to prepare tax computations and returns as well as the requested information for all UK taxes in a timely and accurate manner.

e) The approach of the UK group to risk management and governance arrangement in relation to UK taxation

In compliance with KIOXIA Group Standards of Conduct, our management commits to improve tax matters and corporate governance systems. Accordingly, management will supervise the group-wide tax matters, recognize important tax issues and make decisions to resolve them.

This UK Tax Strategy applies to:

KIOXIA Europe GmbH - UK Branch

KIOXIA Technology UK LTD