



Aozora Europe Limited Tax Strategy

This document, approved by the Board of Directors of Aozora Europe Limited, sets out its approach to managing its tax affairs and tax risks.

The document is prepared in alignment with the Aozora Bank Group Tax Compliance Policy.

Introduction to Tax Strategy

Aozora Europe Limited is committed to:

- Remaining compliant with all applicable UK laws, rules and regulations;
- Paying the right amount of tax at the right time;
- Applying diligent care in tax related decision making processes and procedures; and
- Maintaining open, honest and transparent relationships with tax authorities.

Tax Governance

The Board of Directors of Aozora Europe Limited is ultimately responsible for the compliance and risk management of UK tax and the principal tax risks are monitored and reviewed on an ongoing basis.

Governance around tax matters follows formal procedures which are in line with other approved governance procedures implemented across the wider worldwide business.

The company has appropriate internal systems and controls in place to ensure that all financial transactions are accurately recorded and the tax is calculated correctly and compliance requirements are met.

Tax Planning

The company aims to carry out its financial affairs in the most tax efficient manner while ensuring full compliance with UK tax law and making accurate and timely tax returns and payments. It will only enter into tax planning that has commercial and economic substance and will not undertake any structuring that is contrived or artificial to reduce its tax liabilities.

Tax Risk Management

Given the scale and nature of the worldwide business, Aozora Europe Limited considers its tax risk to be relatively low, however the company constantly seeks to identify and deal with such potential risks when they arise. The amount of risk that the company is prepared to accept is low and this approach to tax risk is aligned to its tax governance and internal policies.

Where there is uncertainty as to application of complex tax law, external advice is sought from the major accounting and legal firms to address this uncertainty. Significant risks, if they arise, will be escalated to the Board.

Relationships with Tax Authorities

Aozora Europe Limited seeks to maintain transparent and mutually respectful relationships with HMRC and to make honest and timely disclosure in communications and returns.

When there are disagreements with HMRC on issues, the company attempts to resolve the issues in an open and timely manner.

This statement is intended to meet the requirements of Section 22 (2) of Schedule 19 of the 2016 Finance Act, in respect of the company's financial year ended 31 March 2025.