

Tax Strategy Document for Sumitomo Forestry Europe Limited and the other members of its UK sub-group Financial Year: 31 December 2024

1. Introduction

This document, as approved by the Board of Directors of Sumitomo Forestry Europe Limited ("the Company"), sets out the tax strategy of the Company and all the other UK members of the UK sub-group, namely SF Paradise Limited, Bywater SFC Holdings Limited, Bywater SFC Management Limited, Bywater SFC Investments Limited, 123 Golden Lane Limited, 35 Fountain Street Limited, 34 Fouberts Place Limited, Coombe Road Holdings Limited and Coombe Road Propco Limited (together, "the UK Group"). All UK entities are coterminous and have a year end of 31 December 2024.

The UK Group's tax strategy is published in accordance with Schedule 19 of the Finance Act 2016. It applies to all UK taxes relevant to the UK Group's operations.

2. Tax governance

The Board of Directors of each entity is ultimately responsible for the compliance and risk management of all UK taxes for that entity, with principal tax risks monitored and reviewed on an ongoing basis. Day-to-day responsibility is delegated to the Finance Team.

The ultimate parent, Sumitomo Forestry Co. Ltd ("HQ") has established an Corporate Planning Department to provide support on international tax operations including UK taxes. There is also a Risk Management Committee within HQ which monitors tax governance and other compliance matters.

3. Our approach to tax

The UK Group is committed to:

- **Compliance:** Complying with all applicable UK tax laws and regulations in a responsible and transparent manner.
- **Accuracy:** Ensuring all tax returns are accurate and filed on a timely basis.
- **Openness:** Maintaining an open and constructive relationship with HMRC.
- **Ethics:** Conducting tax planning in a responsible and ethical manner, consistent with the overall tax strategy set by HQ.

4. Tax risk management

The UK Group recognises that tax risks exist and is committed to identifying, evaluating, and managing these risks effectively. However, given the size and scale of the worldwide business, it is considered that the tax risks within the UK Group are low.

The UK group regularly reviews tax risks arising from its business activities, including changes in legislation and business strategies. With support from HQ, it maintains robust internal controls to ensure compliance with tax laws and regulations.

Where there is any uncertainty or complex tax matters, external advice is sought from the UK Group's accountants and tax advisers. Any significant risks arising are escalated to the relevant Board of Directors as well as HQ.

5. Attitude to tax planning

The UK Group will only engage in tax planning that is aligned with the overall tax strategy set by HQ. This means:

- Tax planning must support underlying commercial objectives and will not be undertaken for artificial or aggressive purposes.
- The UK Group will be transparent with HMRC about its tax planning activities.

The UK Group is only prepared to accept a low level of risk for UK taxation.

6. Working with HMRC

The UK Group is committed to maintaining a cooperative and transparent relationship with HMRC. This includes:

- Engaging with HMRC proactively on complex or uncertain tax matters.
- Disclosing all relevant information to HMRC in a timely manner.
- Working collaboratively with HMRC to resolve any disputes in a fair, quick and efficient manner and to prevent any reoccurrences of problems.

7. Review

This tax strategy will be reviewed annually and updated as necessary to reflect changes in legislation, business activities, and the UK Group's overall tax strategy.

Approved by The Board of Directors of Sumitomo Forestry Europe Limited