

UK Tax strategy

This UK tax strategy disclosure applies to the following UK subsidiaries of Ocean Network Express Pte. Ltd. (Collectively the "ONE Group") of which Ocean Network Express Holdings Ltd. is the ultimate holding company:

Ocean Network Express (Europe) Ltd.

Ocean Network Express (United Kingdom Holdings) Ltd.

Introduction

The ONE Group has established corporate principles to enable the group to actively contribute to global economic growth and development and strive to maximise corporate value through creativity, operating efficiency and the promotion of ethical and transparent management. The Group has also introduced rules of conduct requiring all personnel to observe the laws and regulations of Singapore and all other nations, and act in accordance with social standards and corporate ethics while at all times exercising due caution. In accordance with the rules, the group endeavours to make a positive contribution towards the realisation of a better society as a good corporate citizen in international society and communities.

As tax laws and regulations are evolving and becoming more complex, the risk of unintentional compliance breaches is significantly increasing.

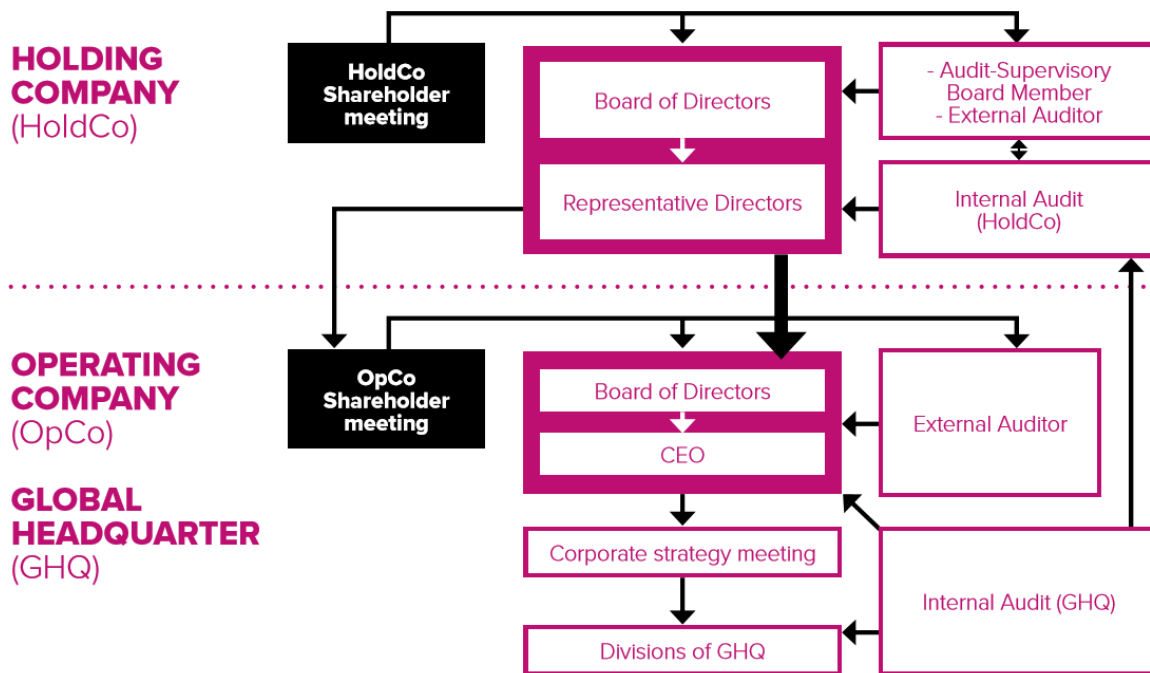
ONE is committed to ensuring compliance with local requirements and working towards tax transparency and disclosure. Consistent with its core value of reliability (i.e. delivering stable, sustainable and professional services), ONE does not condone the behaviour of profit shifting with a tax avoidance intent to minimise its tax obligation and commits to be a responsible taxpayer in all relevant countries. The group strives to carry out its tax strategy without compromising the integrity of its corporate governance and tax morality.

The group's UK tax strategy reflects these values and is based on actively contributing to economic growth through compliance with all applicable UK tax laws, regulations and local practices.

(1) Risk management & governance

Ocean Network Express Holdings, Ltd., the ultimate holding company based in Japan, oversees the governance of all operating companies globally. With operational global headquarters based in Singapore, ONE's global presence through regional offices, branches, subsidiaries and joint ventures will span across more than 100 countries.

This governance structure provides safeguards and measures for managing risks associated with the implementation of tax strategy pertaining to supporting ONE's business objectives and operational needs. In particular, the structure defines proper segregation of duties, risk management responsibilities and ownership and accountability of the overall tax risk management framework.



The tax team established under ONE’s global headquarter actively manage day to day tax matters on a global basis. There is also a deputy tax manager in the United Kingdom (UK) who is responsible for monitoring the tax risks and issues in EU region with a vertical reporting time to the global tax team.

When a tax issue arises, the global tax team will evaluate the nature of the issue and take appropriate action to mitigate the underlying tax issue. There are instances where the tax issue is complex and the law of the land is ambiguous; the global tax team will seek assistance from external advisors.

Day to day tax operations are performed locally and the UK group is supported by external advisors tasked with preparing or reviewing UK corporation tax returns, as appropriate. ONE UK management embraces best practices to ensure collaboration between the tax department and the respective upstream /downstream process owners. This is to ensure a seamless end to end process to achieve accuracy and timely tax filing /reporting and timely identification of tax risks, implementing mitigating action where necessary.

UK management may consult with management of other ONE Group subsidiaries and may report to and seek approval from the management of Ocean Network Express Pte. Ltd. concerning major tax compliance matters or areas of tax uncertainty, on a case by case basis.

(2) Tax planning

Reliability is one of ONE’s core values and we are committed to carry out our business in a truthful and reliable manner. All directors, managers and employees adhere to ONE’s Business Credo and Code of Conduct which includes our pledge to work in accordance with the law and social ordinances as an absolute requirement.

The ONE Group pays all taxes due in the UK and does not enter into artificial tax planning arrangements with the aim of avoiding tax. To the extent permitted by the law, the ONE Group utilises UK tax incentives aimed at promoting economic growth and investment, including capital allowances and group relief for losses. The group also manages its exposure to double taxation, including any double taxation resulting from its UK activities. Where relevant, the ONE Group engages trusted external advisors in seeking clarity on the interpretation of tax law and mitigating tax risk.

(3) Risk tolerance

The group makes decisions involving UK tax matters on a case by case basis taking into consideration relevant tax risks. Each issue is therefore considered on its own merits without rigid levels of acceptable risk, based on consultation with other ONE Group subsidiaries, the management of Ocean Network Express Pte. Ltd., external tax advisors or HMRC, whenever appropriate. The group's internal processes, including its rules of conduct, help ensure that tax risks in the UK are appropriately managed.

(4) Relationship with HMRC

The ONE Group strives to maintain a positive relationship with HMRC and endeavours to be transparent in all its dealings with HMRC. The group seeks to resolve significant uncertainties surrounding the interpretation of tax laws based on a timely and open dialogue with HMRC, usually supported by its external tax advisors.

The publication of this strategy statement is regarded as satisfying the requirements under Paragraph 19(2), Schedule 19, Finance Act 2016. The tax strategy statement relates to our financial year ending 31st March 2019.