

Public

UK Tax Strategy

March 2024

Daiwa Securities Group Inc.

Daiwa
Capital Markets

Introduction

This UK Tax Strategy has been adopted by all UK entities that are controlled by Daiwa Securities Group Inc. including:

- Daiwa Capital Markets Europe Limited (DCME)
- DC Advisory Holdings Limited (DCAHL)
- Daiwa Corporate Advisory European Holdings Limited (DCAEH)
- Daiwa Corporate Advisory Limited (DCA)
- Daiwa Sustainable Investments Limited (DSIL)
- Daiwa Asset Management (Europe) Limited (DAMEL)
- Daiwa Institute of Research Limited – London Branch (DIR)

These entities are collectively referred to as the UK Group for the purposes of this UK Tax Strategy.

The approach of the Daiwa Securities Group to corporate tax matters is governed by the Tax Policy enacted by the Group.

Daiwa Securities Group Tax Policy

1. Compliance

Daiwa Securities Group fulfils its social responsibility by complying with laws and regulations (including their intent or spirit) of every country and region, and through appropriate tax payments with high ethical standards.

2. Tax Planning

Daiwa Securities Group eliminates tax risks by eliminating double taxation through tax treaties and other means, optimizing tax expenses through appropriate use of preferential tax treatment, and conducting appropriate tax treatment in light of the tax regulations of each country and region.

In addition, Daiwa Securities Group does not engage in any inappropriate transactions without commercial substance for the purpose of tax avoidance. We do not transfer profits to low-tax countries or regions, or use tax havens for the purpose of tax avoidance.

3. Transfer Pricing Taxation

For cross-border intragroup transactions, Daiwa Securities Group sets appropriate prices which comply with arm's length principles in accordance with the OECD Transfer Pricing Guidelines as well as tax laws and ordinances in each country and region.

4. Appropriate Disclosure

Daiwa Securities Group provides transparent and appropriate disclosure of its tax policy and other tax-related information.

5. Responsibility

Daiwa Securities Group regards tax risks as key management issues and its Chief Financial Officer (CFO) is responsible for all tax issues of the group. In addition, the CFO, executive officer in charge of Finance, and Head of Finance Department of Daiwa Securities Group Inc. from time to time provide guidance and advice to subsidiaries and other departments within the group as necessary, so that corporate governance over tax matters is shared and implemented throughout Daiwa Securities Group.

6. Relationship to Tax Authority

Daiwa Securities Group maintains a relationship of trust with tax authorities by responding to them in a cooperative and honest manner.

Tax Governance and Risk Management in relation to UK taxation

Ultimate responsibility for the UK tax strategy rests with the Board of each company or senior management in the case of DIR. The CFO or equivalent position in each company has overall responsibility for UK taxation matters. For DCME, the day-to-day responsibility is delegated to the Head of Tax who reports to the Deputy CFO. The finance teams or management of the other entities manage the tax affairs on a day-to-day basis with support from DCME.

DCME has an in-house tax team, staffed by qualified and experienced tax professionals. The Head of Tax is responsible for the management of tax risk. The tax risk management process is aligned with the company's overall risk management framework for identifying, managing and controlling risks. The tax team maintains documented policies and procedures with respect to compliance obligations which are reviewed regularly and updated for changes in tax legislation.

For DCME, the Head of Tax reports quarterly on tax matters and key tax risks to the Audit Committee.

For DCA, DCAEH and DCAHL the CFO and finance team meet regularly with DCME tax team to ensure compliance with UK tax obligations. The CFO reports at least annually on tax matters and key tax risks to the Boards of DCA and DCAEH after consultation with the DCME Head of Tax.

For DSIL the CFO is supported by the DCME tax team as required.

DAMEL senior management manages all the company's risk including tax. DAMEL is supported by the DCME Tax and Performance & Reward teams in regards to tax.

For DIR, the chief representative manages risk including tax. DIR is supported by the DCME Tax and Performance & Reward teams in regards to tax.

Attitude towards UK Tax Planning

The UK Group will only undertake tax planning that is aligned with the business strategy and supports genuine commercial activity. The companies listed above do not enter into arrangements that would lead to a failure under Part I of the Code of Practice on Taxation for Banks which has been adopted.

Level of UK tax risk

The UK Group's appetite for tax risk is low. It does not participate in aggressive tax planning or complex structured arrangements designed to minimise tax liabilities.

Tax Compliance and Relationship with HMRC

The UK Group is committed to full compliance with its UK tax obligations. The UK Group strives for an open, transparent and cooperative relationship with HMRC. This includes a timely tax compliance process in respect of applicable UK taxes and timely response to HMRC requests or enquiries.

The companies listed above regard this publication as their sub-group or company UK tax strategy for the year ended 31 March 2024 (complying with their duty under paragraph 19(2) and 20 or 22(2), as appropriate of Schedule 19, Finance Act 2016.