

NGK Spark Plugs (UK) Ltd

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Tax Strategy - year ended 31 March 2021

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This tax strategy applies to the NGK Spark Plug business in the UK. Its publication is regarded as satisfying the statutory obligation under Schedule 19 of the UK Finance Act 2016 for the year ending 31 March 21.

NGK Spark Plugs (UK) Ltd follows the NGK Spark Plug global corporate compliance policy, which recognises that “we are a member of society and, in understanding the spirit and the purpose of the laws and ordinances, respond appropriately to the demands of society and aim to become a company trusted by the international community”.

We undertake the payment of taxes on the basis of this policy, and in accordance with the following principles:

- NGK Spark Plugs (UK) Ltd will fulfil its social responsibilities by observing the laws on corporate taxation and other taxes, as well as international taxation standards including the OECD Transfer Pricing Guidelines and the Action Plan on Base Erosion and Profit Shifting (BEPS).
- In order to ensure compliance with tax law, NGK Spark Plugs (UK) Ltd will work towards improving our knowledge of, and correct understanding of taxation, and to enhance reliability and transparency, adopting a sincere approach of honesty and maturity to all interactions with tax authorities.
- NGK Spark Plugs (UK) Ltd will properly manage tax risks by working toward appropriate disclosures and payment of taxes, thereby enhancing shareholder value of the NGK Group.

Our approach to tax risk management and governance

NGK Spark Plugs (UK) Ltd is subject to a broad range of UK taxes, including corporation tax, VAT, customs duties, employment taxes and other local taxes, such as business rates. We are committed to complying with our UK tax obligations and to developing and maintaining a strong governance framework to support this.

Ultimate responsibility for the tax strategy and the supporting governance framework, procedures and controls for the management of tax risk rests with the Board of Directors.

Day to day responsibility for these areas and the operational management of tax risk lies with the General Manager – Finance. Where considered appropriate, we engage external professional advisors to support us in meeting our tax payment and filing arrangements and to provide advice where there is potential uncertainty or complexity in relation to a risk or the application of legislation.

Our attitude to tax planning and the level of tax risk we are prepared to accept

We are committed to paying an appropriate amount of tax, while considering the need to structure our business in an efficient manner. We take account of a number of factors, including tax, in considering how to achieve our commercial objectives and will seek to make use of tax reliefs, incentives and credits available to the business where appropriate. Any tax planning undertaken by us will have commercial and economic substance and will have regard to our global Corporate Philosophy and Corporate Code of Conduct and the potential impact on our reputation.

Our approach to tax risk follows the principles that apply to the management of our other business risks. We consider issues individually, taking account of the commercial needs of the business and our corporate philosophy in assessing the level of risk we are prepared to accept. We are working to develop and maintain policies that operate to support compliance with UK tax laws and regulations and to enable us to identify, assess and manage tax risks.

Our relationship with HMRC

NGK Spark Plugs (UK) Ltd is committed to having an open, professional and cooperative relationship with HMRC. We aim to ensure full disclosure of relevant information and to respond to queries and information requests in a timely manner. Where there is uncertainty or difference of opinion on the appropriate tax treatment in a given case, we seek to work constructively with HMRC in order to resolve the matter.

31 March 2021

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