

# **MHC Infrastructure UK Limited and APPLE HOLDCO (J) LIMITED and APPLE FINCO (J) LIMITED - Tax Strategy**

## **Introduction**

MHC Infrastructure UK Limited (“MIUK”) and APPLE HOLDCO (J) LIMITED and APPLE FINCO (J) LIMITED (“APPLE SPC”) are UK registered company, which are wholly owned subsidiary of Mitsubishi HC Capital Inc. (“MHC”), headquartered in Tokyo, Japan.

This document is intended to outline MIUK and APPLE SPC’s approach to managing their tax affairs, and satisfies MIUK and APPLE SPC’s reporting requirements in respect of the financial year ended December 2024, in line with Schedule 19 of the UK Finance Act 2016. This document will be updated regularly to reflect any changes to the company’s tax strategy.

MIUK and APPLE SPC’s tax strategy is in line with the general group tax policy of MHC. The group’s basic tax policy seeks to ensure that:

1. All tax compliance obligations are fulfilled;
2. The group does not engage in any tax avoidance or contrived tax planning;
3. The group is transparent in its tax affairs; and
4. A trusted relationship with tax authorities is maintained.

## **Management of tax risks**

Ultimate responsibility for MIUK and APPLE SPC’s tax compliance and strategy lies with MHC. The business uses professional tax advisors to support its tax compliance and ensure tax risks are mitigated appropriately.

Any proposed material changes to business operations or structure are subject to a risk review and approval process at MHC, which includes consideration of the tax implications. Tax risk controls are subject to periodic review by MHC.

## **Attitude to tax planning**

In line with the group’s basic tax policy, MIUK and APPLE SPC do not engage in tax avoidance, and any tax planning undertaken is done so with the primary objective of maintaining compliance with the relevant tax regulations of the jurisdictions involved, and with the assistance of professional tax advisors.

## **Accepted level of risk**

MIUK and APPLE SPC aim to comply fully with UK tax regulations and has procedures in place to ensure that tax risks are minimized as far as is reasonably possible. Accordingly, MHC Infrastructure UK Limited and APPLE SPC use professional tax advisors where relevant to assist in managing all aspects of their UK tax affairs.

## **Approach to working with HMRC**

MIUK and APPLE SPC maintain an open and transparent relationship with HMRC, in line with the group’s basic tax policy. MIUK and APPLE SPC aim to cooperate fully with any enquiries or other queries raised by HMRC.

This policy for MIUK has been reviewed and approved by the Directors of MIUK and at MHC December 7, 2023.

This policy for APPLE SPC has been reviewed and approved by the Directors of APPLE SPC December 7, 2023.