

## **MITSUBISHI UFJ TRUST AND BANKING CORPORATION – SINGAPORE BRANCH** **TAX STRATEGY STATEMENT**

### **PURPOSE**

Mitsubishi UFJ Trust and Banking Corporation (MUTB), headquartered in Tokyo, Japan is a wholly owned subsidiary of the Mitsubishi UFJ Financial Group (MUFG).

As a member of MUFG, MUTB Singapore Branch complies with all the domestic and international laws and rules that may apply. We also strive to carry out fair and transparent corporate activities with honesty and integrity, in a manner that supports and strengthens the trust and confidence that MUFG has built over the years.

The effective date of this tax strategy is 1 Jan 2026.

### **COMPLIANCE WITH TAX LAWS**

In line with MUFG Tax Policy, MUTB Singapore Branch ensures that it has sound tax governance and operations consistent with its policy to comply with all applicable tax legislation to the fullest extent possible.

MUTB Singapore Branch is committed to paying the appropriate amount of tax on its business activities and does not engage in any form of tax planning to avoid taxation. MUTB Singapore Branch aims to comply fully with Singapore tax rules and accepts a low tolerance in respect of tax compliance failure.

MUTB Singapore Branch is committed to complying with BEPS Action Plan, OCED transfer pricing guidelines and other international tax rules. Cross border intra group transactions are priced and carried out in accordance with the arm's length transfer pricing principles.

### **GOVERNANCE STRUCTURE TO MANAGE TAX RISKS**

In line with MUFG Tax Policy, MUTB Singapore Branch is consistently committing to complying with tax laws and regulations by fulfilling its tax obligations in a fair and appropriate manner.

The responsibility for Singapore tax compliance and the MUTB Singapore Branch's tax governance policy lies with the Branch General Manager with the support from the Chief Manager of Accounts Department.

Responsibility for day-to-day corporate tax compliance, including inter-company arrangements (e.g. transfer pricing agreements) rests with the Chief Manager of Accounts Department. Where there is uncertainty or complexity in relation to tax risks, the Chief Manager of Accounts Department will engage with external tax advisors to ensure its tax filing obligations are fulfilled appropriately.

MUTB Singapore Branch maintains documented tax policies and procedures for corporate income tax and goods and services tax which are reviewed by the Chief Manager and approved by the General Manager on an annual basis.

Any new product or business undertaking is subject to a review process which includes a review of legal, regulatory and other financial risks, including taxation implications. The MUTB Singapore Branch's Accounts Department must be consulted for tax compliance and reporting requirements. To the extent that there is significant tax uncertainty or complexity, we will seek external professional advice or, where applicable, consult with the relevant tax authorities.

The officers and employees of the MUTB Singapore Branch are required to promptly consult with or report to the tax department in MUTB Head Office in cases where they identify any behaviour deemed to raise serious concern over group internal tax compliance.

Tax risk controls are subject to periodic review by the MUTB Singapore Branch's internal audit function.

## **RELATIONSHIP WITH THE IRAS**

MUTB Singapore Branch maintains an open and transparent relationship with IRAS. It strives to engage proactively with IRAS and to voluntarily disclose and rectify errors (if any) on timely basis.

MUTB Singapore Branch co-operates fully with any IRAS tax queries or compliance review process. Any queries from IRAS are dealt with in a collaborative and timely manner.