UK Tax Strategy

This document, which has been approved by the Board, is published in accordance with Paragraph 19(2) Schedule 19 of the Finance Act 2016 in respect of our financial year ending 31 March 2020.

The UK tax strategy contained herein applies to "K" Line Holding (Europe) Limited and its subsidiaries listed below:

- "K" Line (Europe) Limited
- "K" Line LNG Shipping (UK) Limited
- "K" Line Bulk Shipping (UK) Limited

References made to the "K" Line UK subsidiaries' (which are the 4 UK companies mentioned above) are to all "K" Line UK companies and branches. References made to "K" Line' or the 'Company' are to all "K" Line companies.

This strategy applies from the date of publication until it is superseded.

➤ The approach of the business to risk management and governance arrangements in relation to UK taxation

"K" Line is committed to high standards of corporate governance. "K" Line recognizes that good governance is pivotal in the business delivering its strategy whilst generating sustainable shareholder value and meeting our obligations towards our stakeholders.

The "K" Line UK subsidiaries consider compliance with tax legislation as key to managing their tax risk. The day-to-day management of the "K" Line UK subsidiaries' tax affairs is assisted by the work of the "K" Line UK subsidiaries' external tax advisors. The team works closely with other business functions to ensure that inherent tax risks are identified and managed appropriately.

With the tax landscape constantly changing, the "K" Line UK subsidiaries' tax affairs and tax risk management procedures are regularly reviewed to ensure that processes and measures are up-to-date so that we are able to identify, assess, manage and mitigate tax risk appropriately.

The Directors are responsible for ensuring that policies and procedures that support the approach are in place, maintained and used consistently, and that the Finance team has the skills and experience to implement the approach appropriately.

Where there is uncertainty in how the relevant tax law should be applied, external advice may be sought to support the decision making process.

> The attitude of the business towards tax planning (so far as affecting UK taxation)

The "K" Line UK subsidiaries adhere to relevant tax law and seeks to minimise the risk of uncertainty or disputes. The "K" Line UK subsidiaries do not engage in artificial tax arrangements.

The level of risk in relation to UK taxation that the business is prepared to accept

The "K" Line UK subsidiaries' appetite for tax risk is low. The structure of our affairs is based on sound commercial principles and in accordance with the relevant tax legislation. External advice is sought where appropriate.

> The approach of the business towards its dealings with HMRC

The "K" Line UK subsidiaries are committed to the principles of openness and transparency and adopt a proactive approach to raising tax issues and working collaboratively with HMRC. The Senior Accounting Officer, in conjunction with the external tax advisors, maintains contact with the "K" Line UK subsidiaries' Customer Compliance Manager and will assist HMRC during the periodic Business Risk Reviews.

The team seeks to respond to HMRC on timely basis in case of any requests for information. The processes and controls which are designed to support the delivery of the "K" Line UK subsidiaries' tax objectives are regularly reviewed.

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