

TAX GOVERNANCE POLICY

Tax Risk Management and Governance Policy for JERA Global Markets Pte. Ltd.

The JERA Global Markets Group (JERAGM) is a leading utility-backed energy trader specialising in LNG, power, coal and freight.

JERAGM is a joint venture between majority shareholder JERA Co., Inc (66.7%), the leading Japanese power producer and EDF Trading Ltd (33.3%), the trading arm of a leading European power producer Électricité de France S.A. (EDF).

Guided by core values of Agility, Collaboration, Trust, and Ownership, the Group is committed to responsible business practices and sustainable value creation.

The Group's Tax Strategy and Tax Policy aligns with the Inland Revenue Authority of Singapore's Tax Governance Framework (TGF), emphasising compliance, tax risk governance, and strong relationships with tax authorities. This Policy sets out the Group's tax governance, strategy, and risk management approach, complementing other operational policies.

The following provides a holistic overview of the Group's principles and practices under the three TGF building blocks:

Compliance with Tax Laws

- We are committed to full compliance with all applicable tax laws and regulations in Singapore. We commit to ensure that all tax filings, payments, and disclosures are accurate, complete, and submitted timely in accordance with statutory deadlines.
- We adopt a conservative and responsible approach to tax planning, ensuring that all arrangements have a genuine commercial purpose and are aligned with the spirit and intent of the law. Tax considerations are integrated into business decisions and transactions, with the Tax Team providing oversight and approval to mitigate tax risks.
- Regular reviews and self-assessments are conducted to monitor compliance and identify any potential gaps. Where uncertainties arise, we proactively seek clarifications from external tax advisors and/or tax authorities to ensure strong technical support for our tax positions regarding the interpretation and application of tax laws.

Relationship with Tax Authorities

- We seek to build and sustain an open and professional relationship with the Inland Revenue Authority of Singapore (IRAS), founded on trust and mutual respect. This approach enables efficient, transparent, and collaborative communication when addressing tax matters.
- We commit to timely and appropriate responses to IRAS inquiries, cooperating in good faith and taking necessary measures to prevent recurrence of tax issues.
- We also proactively engage with IRAS and other Government authorities on new tax developments / requirements to minimise disputes and aim to reach timely consensus on any disagreements. This supports our objective of managing tax risks effectively while maintaining a strong and credible standing with regulators.

Governance for Managing Tax Risk

- We have a formalised governance structure with clearly defined roles and responsibilities. At the highest level, the Board of Directors provides ultimate oversight of tax governance and receives updates on tax risk management strategies and significant tax matters, when required. The Board is supported by various committees and chief officers, along with a qualified internal Tax Team that manages tax compliance, reporting, and risk mitigation activities, ensuring adherence to established tax policies and procedures.
- A robust system of internal controls and tax risk management processes is maintained to identify, assess, and mitigate tax risks. Significant tax risks or issues are escalated to senior management and, ultimately, to the Board for review, guidance, and decision-making, ensuring that key matters receive appropriate oversight.
- Where tax matters involve complexities beyond internal expertise, we engage external advisors to provide specialised guidance and ensure prudent tax risk management. Where appropriate, we also proactively seek advance rulings or clarifications from tax authorities to enhance certainty and support sound tax law application.