

JERA Global Markets Tax Strategy 2026/27

Introduction To JERA Global Markets

The JERA Global Markets Group ("the Group") is headquartered in Singapore, with offices located in the UK (London), Japan (Tokyo), Brisbane (Australia) and the US. The Group is a leading utility-backed energy trader specialising in LNG, Power and Coal & Freight. In April 2025, the company expanded its remit to include Japanese power trading following the integration of its shareholders' respective Japanese power trading businesses.

JERA Global Markets is a joint venture between majority shareholder JERA Co., Inc. ("JERA") (66.7%), Japan's largest power generation company and EDF Trading Ltd ("EDFT") (33.3%), the trading arm of a leading European power producer Electricité de France.

The Group operates one of the most exciting energy portfolios in the world which gives it access to an in-depth understanding of the way local, regional and international energy markets behave. These insights enable the company to help its customers increase security of supply, optimise their fuel supply portfolios and improve the risk management of their energy assets.

JERA Global Markets Pte. Ltd. ("JERAGM"), the primary entity of the Group where majority of the business operates under, is rated AA- (stable) by R&I rating agency and benefits from strong financial support from both its shareholders.

Governance

The Group's CEO reports to a Board constituted of 6 representatives, 4 appointed by JERA and 2 by EDFT. The activity of the Board is supported by 2 specialised Committees: the Audit Committee looking at Finance (including Tax), Internal Audit, Governance and Risk matters and the Remuneration Committee looking at Health and Safety, Human Resources and Compensation related matters. Both those committees regularly report to the Board.

Supporting the CEO is an Executive Committee ("ExCom") constituted of the Chief Finance and Risk Officer ("CFRO") and the Managing Director of Japanese Power. The wider Leadership Team comprises the SVP Coal, the SVP LNG, the SVP JERA Supply, the SVP Finance and Treasury, the SVP Legal, Compliance and Contracts, the SVP IT and the VP Risk and Middle Office Transformation who support the ExCom in the management of the JERAGM group's commercial activities and business operations.

The SVP Finance and Treasury, who reports to the CFRO, has overall responsibility for the tax strategy, tax risk management and the governance framework which supports the tax strategy. Day-to-day management of the tax strategy is delegated to the Group Tax Manager who reports to the SVP Finance and Treasury.

Tax Strategy & Application

This Tax Strategy applies only to JERAGM, and its UK-based affiliates JERA Global Markets UK Ltd and JERA Global Markets Holdings Ltd, and is consistent with the overall strategies of the Group's shareholders, JERA and EDFT. It aims to create value for the business and shareholders while upholding its reputation and commitment to responsible business practices.

Commitment to Tax Compliance

The Group seeks to comply with its tax, filing and payment obligations globally. Further, the Group aims to act with integrity and transparency in all tax matters with a commitment to full compliance with all tax legislation and full disclosure to tax authorities in the jurisdictions in which it operates in.

Risk Management

The Group benefits from a tried and tested Risk Control and Management framework. This framework hinges around 5 core components:

- 1- **Oversight** of the organisation's risk management approach, policies and systems through **the Board, Audit and Remuneration Committees**.
- 2- **Core policies** that set a comprehensive framework for doing business at JERAGM.
- 3- JERAGM departments use a suite of **risk controls** to manage, monitor and report risks/ breaches on a daily basis
- 4- Several **internal committees** are in place to coordinate and support risk management activities, to consider identified breaches, to review projects and counterparts and to take corrective actions when needed.
- 5- **External auditors** / consultants provide an independent assurance over risks and controls activities at least once a year

Regular risk controls are performed by each department in line with the policies and procedures in place. Roughly 30 controls are performed at the end of each day to ensure operational processes have been properly followed.

Responsibilities for operating and monitoring risk management and internal control activities are clearly documented and communicated across the company. Education and training to ensure an appropriate awareness of roles, responsibilities and accountabilities are available for employees.

The Audit Committee and Board of Directors regularly evaluate the effectiveness of processes for identifying and managing risks to the achievement of the Group's objectives and can challenge or approve the risk profile of the Group.

Specifically, regarding identification, assessment and management of Tax risk the Group has developed what it believes to be appropriate systems and procedures.

The Group is proactive in managing tax risks throughout its business. It ensures they are highlighted and monitored and that the most significant are reported to the appropriate level to ensure efficient oversight and Board engagement.

JERAGM's Approach To Tax Planning

JERAGM aims to manage its tax affairs in an efficient and pro-active manner to ensure its tax attributes maximise value for our shareholders. The company utilises tax incentives, exemptions and reliefs where they are relevant to its business and apply them in the manner intended.

JERAGM only undertakes tax planning to enable the elimination of tax risk created by its day-to-day business operations (e.g. to avoid suffering double taxation or unexpected tax costs arising from commercial activities). It does not participate in any artificial schemes or arrangements that are primarily designed and focused on reducing tax liabilities. The purpose of the JERAGM tax department is to be a trusted business partner through the provision of timely and reliable advice, efficient tax planning and effective compliance procedures.

External advice may be sought in relation to areas of uncertainty or complexity and to ensure that JERAGM's activities are in line with our tax strategy.

JERAGM's Approach To Dealings With Tax Authorities

JERAGM works together with tax authorities in a manner that is open and honest in order to build positive, long-term relationships. It aims to maintain regular contact and dialogue with tax authorities to ensure complete transparency of its tax liabilities and obligations.

JERAGM ensures that tax authorities are kept up to date on significant transactions or changes to the company's business and disclose all relevant facts including details of any transactions or issues where the tax treatment is unclear. This approach is applied proactively to both current and future events and transactions.

Transparency

JERAGM complies with international compliance measures to improve transparency including OECD measures such as country-by-country reporting and where relevant exchange of information between tax authorities. The company do not tolerate tax evasion or the facilitation of tax evasion by persons acting on its behalf.

The JERA Global Markets Group regards the publication of this document as complying with the duty under paragraph 19(2), Sch.9, Part 2 of the Finance Act 2016.