

1. Introduction

Hitachi conducts business on a global scale across a broad range of business areas and utilizes sophisticated and specialized technologies to carry out its operations. As a result, it is exposed to risks attributable to the economic environment, risks inherent in individual industrial sectors and business lines and risks related to our operations. This is no different in the UK.

Recent developments in the tax environment have led to tax authorities around the world introducing additional reporting to enhance transparency, compliance, and governance requirements that companies must fulfil. These include the Senior Accounting Officer (“SAO”) rules and Publication of Tax Strategy requirements in the UK, the latter requiring UK resident companies that meet certain requirements to publish their tax strategy in the UK and make it available for the public.

Hitachi, as a responsible company, keeps up to date with these requirements and ensures measures are put in place not only to comply with them but also strive to encourage ethical and transparent business practices. As part of these measures, in 2016, Hitachi introduced basic rules that Hitachi Group companies must follow when dealing with any matter related to tax (the “global tax rules”). These rules are monitored and updated on a regular basis.

Scope

This Hitachi Group Strategy for UK Tax Management (the “UK Tax Strategy”) applies to all Hitachi Group UK resident entities as listed in Appendix 1.

2. UK Tax Strategy

The publication of this statement is in accordance with the statutory requirements under Para 19(2) and Para 22(2) Schedule 19 of Finance Act 2016. This statement applies to all Hitachi group entities in the UK as of March 31, 2026. It will be reviewed and updated annually and applies to all direct and indirect taxes listed in paragraph 15(1) of Schedule 19 of the Finance Act 2016, including income tax, corporate tax, VAT and PAYE.

About Hitachi in the UK

We are a global enterprise in the UK, bringing a multitude of supply chain benefits and helping to boost local economies. The UK has been a focus

country for the development of Hitachi's global business for nearly fifty years, manufacturing since 1975.

The UK has been Hitachi's European 'home' since our headquarters were established in 1981. Today, we are proud to be a major global enterprise in the UK – delivering supply-chain benefits, supporting local economies, and creating long-term value for communities. From helping to diversify the UK's energy mix, to tackling major transportation challenges and supporting the transformation of key UK industries, Hitachi is driving meaningful value to the UK and its people.

Introduction to the UK tax strategy

The UK Tax Strategy is focused on ensuring that the Hitachi Group UK companies' taxes and tax risks are managed to provide a sustainable outcome within the parameters of Hitachi's strategic and commercial objectives.

Our approach to UK taxation, including the management of tax risk, tax planning, and our relationship with HM Revenue & Customs, is guided by the Hitachi Group's core VALUES of **Harmony, Sincerity and Pioneering Spirit**. The Group maintains appropriate governance, controls and oversight to identify, assess and manage tax risks, ensuring compliance with UK tax law and alignment between tax outcomes and underlying commercial activity. Consistent with **Sincerity**, Hitachi Europe Ltd does not engage in artificial or aggressive tax planning; any tax planning undertaken supports genuine business operations and reflects the intention of the law. In line with **Harmony**, we seek to maintain an open, cooperative and professional relationship with HMRC, engaging constructively and transparently to achieve certainty where possible and resolve issues in a timely manner. Reflecting **Pioneering Spirit**, we continuously review and enhance our tax processes and controls to respond effectively to changes in legislation, business operations and regulatory expectations, supporting a responsible and sustainable approach to taxation in the UK.

The UK Tax Strategy covers the below areas:

- Approach to Risk Management and Governance
- Attitude to Tax Planning

- Level of risk the Hitachi Group UK companies are willing to accept
- Approach of the Hitachi Group UK companies towards HMRC

UK Tax Strategy Statement

(1) Approach to Risk Management and Governance

Our objective is to operate effective governance by implementing an effective tax control framework with an ongoing monitoring process to ensure key tax controls operate to mitigate tax risk to acceptable levels. The global tax rules were introduced as the general rules for risk management and governance to which all Hitachi Group companies must adhere.

The global tax rules require all Hitachi Group companies to manage their tax affairs efficiently, continuously and proactively. These rules also require all Hitachi Group companies to have systems, processes and controls in place that enable them to comply with their tax obligations and identify, assess and manage tax risks. These processes and controls include having defined key roles and responsibilities for tax management appropriate to the size of the business. When and as needed, tax is discussed at the board level of the Hitachi Group companies. In the UK, Hitachi's Internal Audit group performs annual JSOX (Japan's Financial Instruments and Exchange Law) audits on the different group companies testing these systems, processes and controls, and providing assurance to the company's management.

Given the diverse nature of taxation issues and enquiries from tax authorities, each Hitachi group company must evaluate the risks of taxation against the relevant rules and regulations in each country at that given time. If important issues are likely to arise, or have an impact on other group companies, then the company will report to both its parent company and the Hitachi, Ltd. Headquarter Tax Group.

(2) Attitude to Tax Planning

Under the Hitachi Group Codes of Conduct (the “Codes of Conduct”), Hitachi Group companies will always observe laws and regulations and act fairly in all circumstances. In addition, the companies will thoroughly implement the Codes of Conduct to ensure that all their business activities are conducted on the basis of corporate ethics and compliance, in accordance with “basics and ethics.”

Furthermore, as a matter of principle, Hitachi Group companies aim to comply with all relevant tax rules and regulations of the countries in which they operate, as well as with international standards of tax rules.

Hitachi Group UK companies aim to follow the letter and spirit of the law on all matters related to taxation. The tax implications of all significant transactions are thoroughly analyzed, with the support of external tax advisors where necessary, and potential outcomes are determined based on the rules and regulations in force at the time.

When achieving the desired commercial result, the most tax efficient outcome will be considered; however, Hitachi Group companies, as a responsible global corporate citizen, we do not engage in any form of aggressive tax planning. As a general rule, any tax planning is aligned with commercial business activities, and the final decision should be based on the commercial needs of the company or group.

(3) Level of Risk that the Hitachi Group UK companies are willing to accept

Just like other businesses, each Hitachi Group UK company has its own inherent level of tax risk that it is willing to accept. Nevertheless, as per the global tax rules, Hitachi Group companies are required to put in place measures to enhance tax risk management.

As a general practice, Hitachi’s appetite for risk is low. Hence, in uncertain situations, Hitachi Group companies will seek advice from independent external tax, legal and accounting firms and HMRC’s support to assess the potential risks of the relevant transaction. This will ensure that our risk management decisions are based upon the latest and most relevant interpretations of laws and regulations. We also ensure that informed tax decisions are made and any tax risk is appropriately reported, managed and documented. Each BU has developed its own approach to tax risk. It monitors its controls against these risks as part of the SAO process as well as Internal Audit process. Each BU have considered all relevant risks to their tax

processes and put mitigation strategies in place that align with HMRC BRR+ expectations.

(4) Approach of the company toward HMRC

Hitachi Group UK companies aim to make accurate and timely disclosures in tax returns and other documents submitted to HMRC. In addition, the companies will respond in a timely manner to any enquiries raised by HMRC and provide any necessary information as required for such enquiries.

Hitachi Group UK companies aim to act in a trustful and cooperative manner when dealing with the tax authorities as specified in the global tax rules. For these purposes, the companies will proactively manage their relationship with HMRC.

Hitachi UK entities are committed to timely submission of accurate tax computations and returns in compliance with all tax laws and regulations in the UK and elsewhere.

3. Compliance

Hitachi Group UK companies keep up to date with legislation and ensure compliance with the applicable requirements. Therefore, the UK resident companies that have met the requirements to publish their tax strategy in the UK for the financial year starting on 1st April 2025 to 31st March 2026 (“FY25”) have done so in accordance with paragraph 16(2) of the UK Finance Act 2016.

Appendix 1: List of Hitachi Group UK companies included in the strategy

HITACHI INFORMATION CONTROL SYSTEMS EUROPE LTD.
HITACHI VANTARA LTD. (U.K.)
HITACHI DIGITAL SERVICES UK LTD
ECS GLOBAL LTD
GLOBALLOGIC CORP. UK LTD
GLOBALLOGIC (UK) LTD
GLOBAL LOGIC (N.I.) LTD

HITACHI SOLUTIONS EUROPE LTD
HORIZON NUCLEAR POWER LTD
HORIZON NUCLEAR POWER WYLFA LTD
HORIZON NUCLEAR POWER OLDBURY LTD
HORIZON NUCLEAR POWER SERVICES LTD
HORIZON NUCLEAR POWER WYLFA HOLDINGS LTD
VENTYX PTY LTD
HITACHI ENERGY UK LTD
HITACHI RAIL LTD
HITACHI ZEROCARBON LTD
HITACHI ZEROCARBON BATTERY HOLDING LTD
TELESISEAGLE LTD
HITACHI HIGH-TECH ANALYTICAL SCIENCE LTD
HITACHI EUROPE LTD
HITACHI RAIL GTS HOLDING LTD
HITACHI RAIL GTS UK LTD
GTS QUADRANT LTD
HITACHI RAIL UK LIMITED
HITACHI HIGH TECHNOLOGIES EUROPE GmbH (Branch)
HITACHI INDUSTRIAL EQUIPMENT SYSTEMS EUROPE GmbH (Branch)
HITACHI RAIL SYSTEMS FRANCE (Branch)

Reflects a list of UK consolidated companies as of 1st April 2026.