

EY | Building a better working world

EY exists to build a better working world, helping to create long-term value for clients, people and society and build to trust in the capital markets.

Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate.

Working across assurance, consulting, law, strategy, tax and transactions, EY teams ask better questions to find new answers for the complex issues facing our world today.

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About EY's Tax services

EY's tax professionals in Japan provide you with deep technical knowledge, both global and local, combined with practical, commercial and industry experience. Our highly regarded tax professionals operate in four major cities in Japan. Our talented people, consistent methodologies and unwavering commitment to quality service enable you to build the strong compliance and reporting foundations and the sustainable tax strategies that help your business to succeed. For more information, please visit ey.com/en_jp/people/ey-tax.

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ED None.

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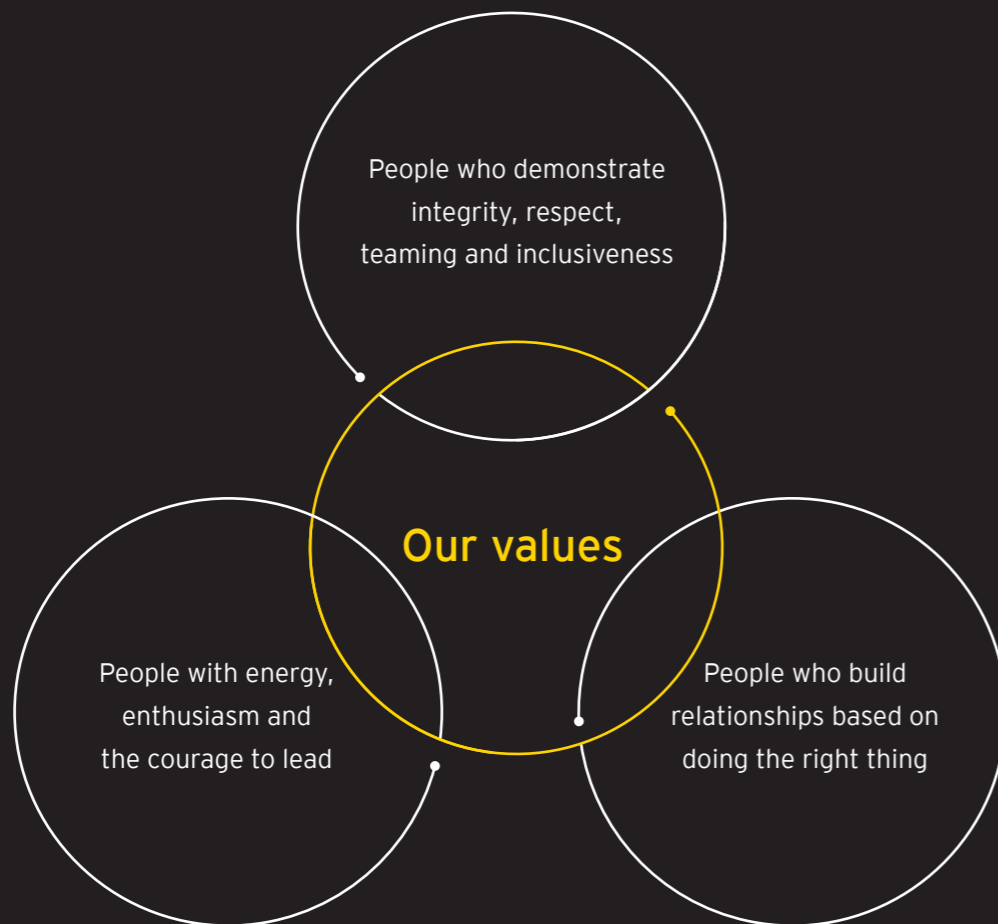
Corporate profile

Building a better working world

Building a better working world - This is our purpose. By offering superior insight and high-quality services, we contribute to building trust in capital markets and the world economy. We develop outstanding team leaders to deliver on our promises to all our stakeholders.

By doing this, we play an important role in building a better working world for EY people, clients and society.

Our values define who we are, and provide the starting point for all our actions and activities.



Leader's message

We are leaders for a new tax era, helping our clients thrive in the globalized business landscape with our best-in-class tax advisory services.

Managing Partner, Ernst & Young Tax Co.

Kazuhiro Ebina



Establishing robust global tax governance has emerged as a pressing corporate challenge as Japanese companies accelerate their overseas expansion.

In today's world, alongside the rise in cross-border investments and overseas M&A, it is increasingly important for international tax practices to properly address varying tax regulations between countries, comply with tax rules for overseas M&A and organizational restructuring, and to manage transfer pricing and other risks associated with adjustments or litigation as a result of tax audits.

Meanwhile, the trends in global sustainability are also impacting the relationship between companies and tax, with investors and other stakeholders cautious about tax avoidance and excessive tax saving measures.

The demand for improved corporate accountability, transparency and fairness is also growing, as seen in the ongoing momentum for mandatory tax disclosures mainly in the US and Europe. Base erosion and profit shifting to low-tax countries by multinational enterprises have become a global issue, driving companies to prepare for the scheduled introduction of BEPS2.0 rules, specifically focusing on global minimum tax. In addition, companies must also respond to various new tax regimes such as carbon taxes - already being introduced in Europe - and tax credit incentives.

The tax environment is increasingly complex and globalized and the demand for business transformation shows no signs of slowing down. Ernst & Young Tax Co. has identified additional key service areas (M&A transactions, cross-border human resources advisory, optimization and outsourcing of accounting and tax affairs, harmonization of legal affairs, technology-oriented transformation of tax affairs and support for high net worth individuals) to help our clients grow their business in combination with our conventional service offerings (tax filings, tax advisory and support for transfer pricing and tax examinations).

At Ernst & Young Tax Co., we also focus on the utilization of technology and the development of human resources as we strive to meet the diverse tax needs of our clients and to offer value-added services. Examples of our initiatives include recruiting and developing professionals specializing in consulting and various other fields, utilizing state-of-the-art technology (including generative AI), and enhancing partnerships with EY member firms around the world, including EY's assurance and consulting service lines in Japan.

In an era where tax is closely linked to corporate business activities and social change, our clients increasingly expect us to offer broader support for their business and not solely advise on tax issues.

The global tax landscape is endlessly evolving, and corporate and international tax strategies will continue to increase in importance. The always present EY purpose of "Building a better working world" cements our commitment to be leaders for a new tax era as tax, accounting and law professionals supporting the infrastructure of the Japanese economy.

Our services

EY professionals support business growth of clients

Ernst & Young Tax Co. provides clients with one-stop support services by leveraging its robust global network consisting of over 150 countries and regions, and by working closely with Ernst & Young ShinNihon LLC, EY Strategy and Consulting Co., Ltd. and other EY member firms in Japan.

In an increasingly complex and globalized tax environment and a relentless pursuit of business transformation, the needs of our clients are becoming more and more diverse. To meet the emerging demand, we have enhanced our conventional tax services such as tax filing support and advisory, and also expanded the scope of our services to cater to the needs of the market.

By leveraging our comprehensive professional services in conjunction with state-of-the-art technology, we will continue to deliver new value to our clients.

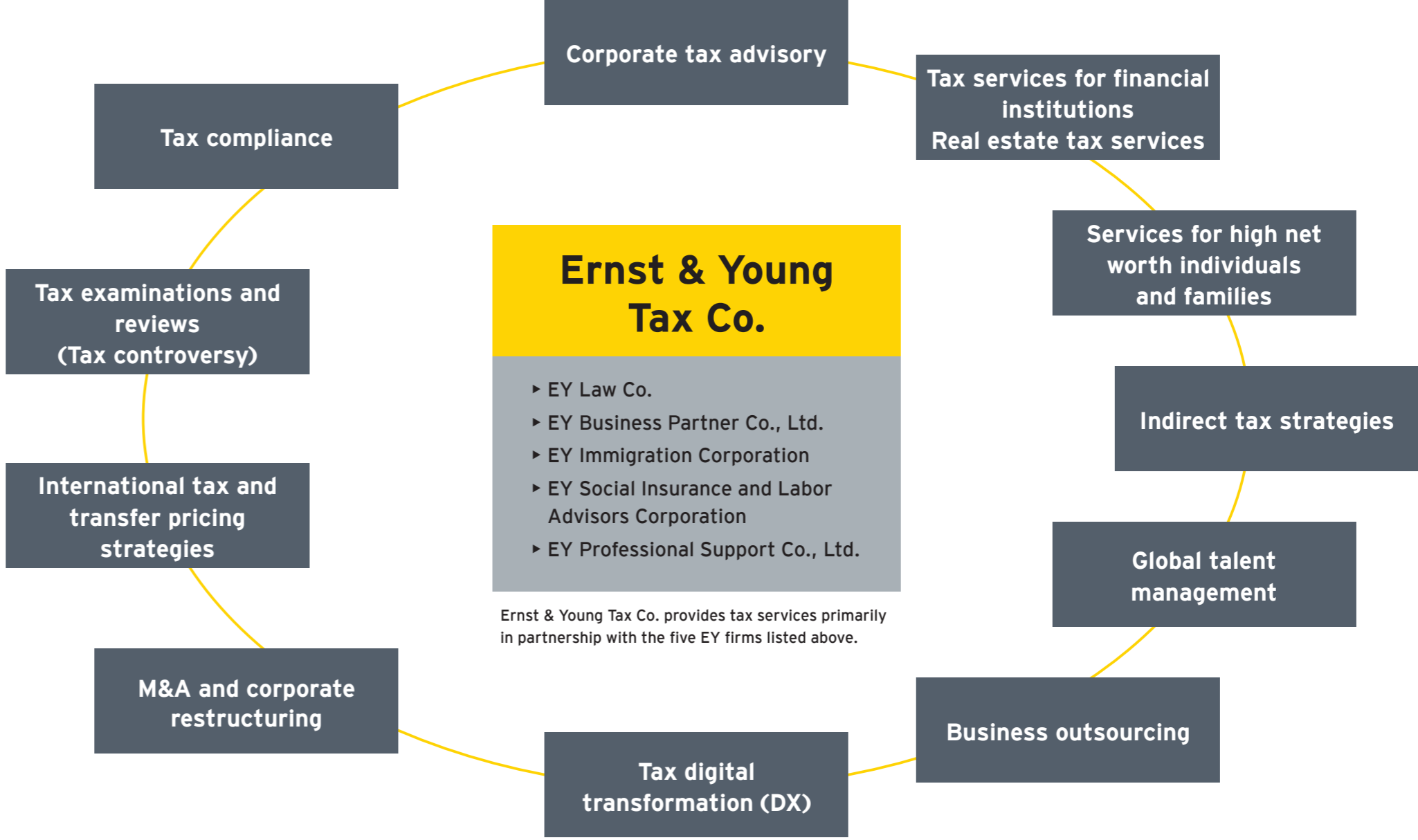
Global network specialized in tax services

Our tax desk global network, consisting of highly experienced tax professionals from major countries around the world, offers cross-border tax services tailored to the needs of each client. Our Japanese offices host tax experts conversant with tax regulations in the Americas, Europe and Asia, enabling us to offer tax services customized for each country.

Meanwhile, Japan Business Services (JBS) supports Japanese companies looking to expand their business overseas and to develop strategies for further growth, leveraging its extensive network present in major cities around the world. JBS tax professionals offer global, cross-border services which target the needs of our clients. JBS provides a suite of services which also includes advice and support for audit and consulting issues.

Sectors

Teams of EY professionals with experience in each sector monitor industry trends and provide solutions tailored to meet the different needs of each industry.



Sectors

Technology / Media and entertainment / Telecommunications	Advanced manufacturing / Mobility	Consumer products and retail	Private equity	Government and public sector / Real estate
Healthcare / Life sciences	Energy	Trading house	Financial services	

Tax services addressing corporate challenges

Service details

Ernst & Young Tax Co. offers an extensive range of tax services based on the needs of and challenges facing companies. Our suite of services spans expert advice on corporate tax and compliance matters to handling international taxation associated with overseas expansion of Japanese companies and expansion in Japan of overseas-headquartered companies. Our key services are outlined below.

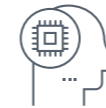
Corporate tax advisory	<ul style="list-style-type: none"> ▶ Tax advice on corporate tax, profit sharing regimes and intra-group transactions ▶ Support for complying with tax reforms and domestic corporate restructuring ▶ Advice for incorporated associations, incorporated foundations, school corporations and medical corporations
Tax compliance	<ul style="list-style-type: none"> ▶ Preparation of tax filings, tax notifications and tax applications ▶ Tax administration processes when establishing new companies or foreign-owned companies in Japan ▶ Tax provisions and tax effect accounting at fiscal year end ▶ Establishing tax governance in Japanese and global companies ▶ Complying with the tax requirements of the Electronic Preservation of Records Act and the qualified invoice system
Tax services for financial institutions	<ul style="list-style-type: none"> ▶ Comprehensive tax services specializing in banking, securities, insurance and asset management ▶ Japan domestic and inbound investment fund structuring and fund (entity) tax compliance ▶ Services to cover FATCA and CRS compliance matters
Tax services for real estate	<ul style="list-style-type: none"> ▶ Tax and transaction structuring advisory services for investors in Japanese real estate, infrastructure and renewables ▶ Tax compliance services for management and investment entities set up in this segment
Tax examinations and reviews (Tax controversy)	<ul style="list-style-type: none"> ▶ Inquiries to the tax authorities and support for tax audit compliance and tax controversy ▶ Support for responding to tax examination (audit) for international taxation ▶ Review of tax implications and support for responding to tax authorities provided by EY Tax Controversy Strategy Team
Services for high net worth individuals and families	<ul style="list-style-type: none"> ▶ Assistance to formulate and execute business succession plans, the preparation of inheritance tax returns, and support when inheriting overseas assets ▶ Family enterprise services
International tax and transfer pricing strategies	<ul style="list-style-type: none"> ▶ BEPS2.0 (global minimum tax, Amount A/B) compliance ▶ Complying with Japanese Controlled Foreign Company (J-CFC) rules ▶ Planning, consulting and implementation support for corporate restructuring ▶ Formulating and implementing transfer pricing policies and assistance with global transfer pricing documentation ▶ APAs and assistance in reaching agreements and resolving issues through intergovernmental negotiations (MAPs and ICAP) ▶ International consolidated effective tax rate optimization ▶ Optimization of supply chain operations
M&A and corporate restructuring	<ul style="list-style-type: none"> ▶ Tax due diligence for domestic and cross-border M&A ▶ Advice on tax structuring for M&A and post-M&A business integration and intra-group business reorganization
Indirect tax strategies	<ul style="list-style-type: none"> ▶ Support for customs duty planning and compliance ▶ Restructuring of global supply chains focused on customs duty cost reductions ▶ Health check and support for optimizing consumption tax ▶ Advice for the management of VAT, GST and consumption taxes
Global talent management	<ul style="list-style-type: none"> ▶ Support for individual income tax filings and visa applications in Japan and overseas, and assistance with establishing centralized management framework for relevant tasks ▶ Advisory services for tax treatment of expatriate staff and business travelers (PE recognition and stock-based compensation) ▶ Formulation of rules (allowances and benefits), assignment contracts and tax policies for expatriate staff ▶ Formulation of policies employing foreign talent in Japan ▶ Management of cross-border remote work

New tax services to support business growth

The business environment of Japanese companies is changing rapidly amid a series of legal and tax reforms in each country, lack of tax personnel and the government's potential move towards tighter taxation.

EY is expanding the scope of its services to help our clients navigate the increasingly complex and globalized tax environment to ensure that their business continues to grow.

Enhancement of tax governance



Business now needs to address the issues of OECD-led international tax reforms, carbon taxes in each country and tax disclosure requirements for a corporate ESG assessment. As a consequence, corporate tax departments must evolve from conventional compliance functions managing tax filings to teams of professionals implementing corporate tax strategies.

In corporate headquarters, tax departments face the immediate challenge of managing a group's business functions and enhancing their ability to formulate tax strategies.

EY's understanding and analysis of the market assists clients in building a solid tax governance framework to ensure that a tax department contributes to corporate value. We are able to leverage a network of professionals with extensive knowledge across multiple fields to provide clients with end-to-end support services, from formulating tax policies to reviewing the limits and responsibilities of each company, establishing business processes and implementing technology.

Tax digital transformation (DX)



Many Japanese companies are choosing to adopt the standardization and digitalization of tax administration. EY's comprehensive approach facilitates corporate tax digital transformation, including the formulation of tax strategies for a digital era, collection of information on global trends in tax administrations, data analytics and robotic process automation (RPA).

EY professionals provide not only conventional tax advisory but also offer PMO services designed to ensure the successful digital transformation of a client's tax administration. To help our clients stay apace with increasing utilization of AI, EY empowers clients to take advantage of generative AI and implement technology solutions in tax operations as a means to improve productivity and create added value.

Business outsourcing



In an EY survey conducted in 2023 into the outsourcing of tax administrations in Japan, 9.2% of Japanese companies said that they would outsource some tax and accounting tasks in the following 24 months, suggesting a further rise in the trend for outsourcing. Ernst & Young Tax Co. provides a comprehensive suite of outsourcing services in partnership with EY Business Partner Co., Ltd., assisting clients with not only tax administrations but also accounting and payroll tasks. We are currently expanding our domestic locations to meet the drastically increasing needs for tax outsourcing.

Tax services for sustainability



EY provides strategic tax services to tackle ESG issues in order to improve corporate sustainability (sustainable growth) and long-term value (LTV).

EY guides a client's journey towards improved corporate sustainability and helps them to achieve their sustainability targets by designing tax frameworks and risk management protocols that accelerate business transformation, promote decarbonization of supply chains and ensure eco-friendly business operations.



Tax services
https://www.ey.com/en_jp/tax

About EY

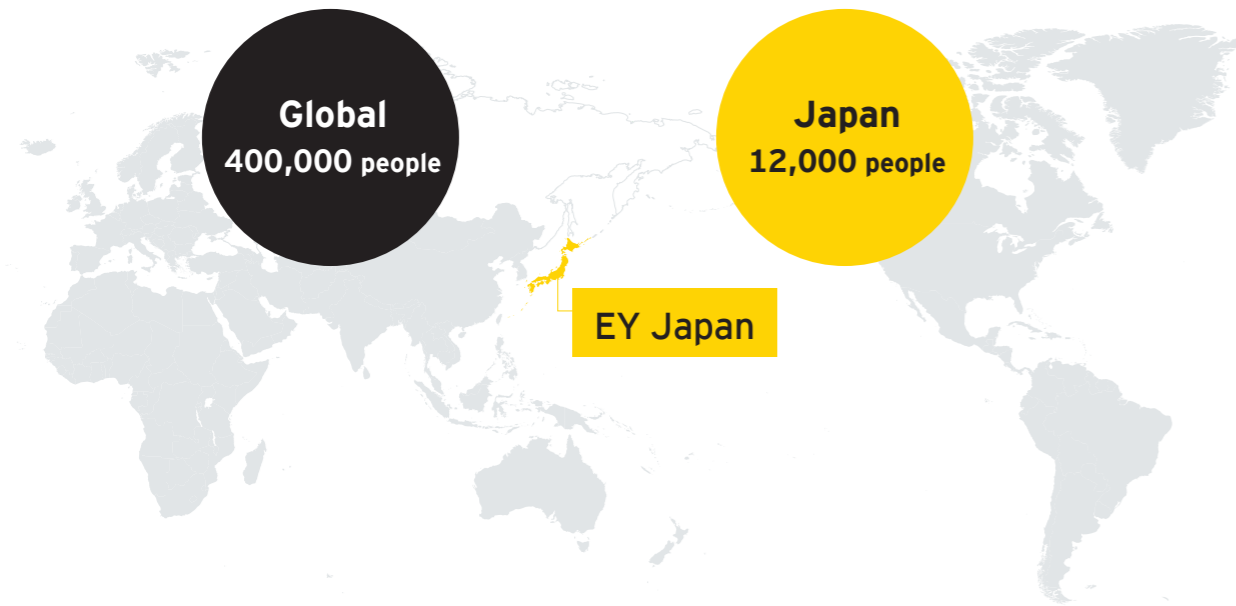


EY global network

EY is a global network of professional services firms, with nearly 400,000 people working across assurance, consulting, tax, strategy and transactions, and present in over 150 countries and regions around the world.

About EY member firms

Each EY member firm is a separate legal entity. The obligations and responsibilities of each member firm are discharged in accordance with regulations established by Ernst & Young Global Limited (EYG) and various other agreements. EYG is a UK company limited by guarantee that coordinates the member firms and promotes cooperation between them to ensure the efficient functioning of the global network.



Headcount as of end of January 2024.

EY Japan

EY Japan refers to the member firms of EY in Japan. Each of these firms is a separate legal entity and provides services through mutual collaboration.

At EY Japan, teams of experienced professionals from Ernst & Young ShinNihon LLC, Ernst & Young Tax Co., EY Strategy and Consulting Co., Ltd. and other member firms work together to provide clients with high-value services which incorporate the most recent and global perspective in solutions to the diverse challenges facing companies.

Principal services offered by EY Japan (as of January 2024)

Ernst & Young ShinNihon LLC.	Ernst & Young Tax Co.	EY Strategy and Consulting Co., Ltd.
<ul style="list-style-type: none"> ▶ Audit and assurance services ▶ Financial Accounting Advisory Services (FAAS) ▶ Climate Change and Sustainability Services (CCaSS) ▶ Forensics (Forensic & Integrity Services) ▶ Growing Enterprise Support 	<ul style="list-style-type: none"> ▶ Corporate tax advisory and tax compliance ▶ International tax strategies, M&A and corporate restructuring ▶ Indirect tax strategies ▶ Global talent management ▶ Business outsourcing related to tax, accounting, payroll and labor affairs 	<ul style="list-style-type: none"> ▶ Transactions and corporate finance (M&A) ▶ Risk ▶ Technology ▶ People ▶ Cross-sector <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p style="text-align: center;">Strategy and Transformation</p> <ul style="list-style-type: none"> ▶ EY-Parthenon (Strategy consulting) ▶ Transformation </div>

Other EY member firms

- | | |
|--|-----------------------------------|
| EY Business Partner Co., Ltd. | Ernst & Young Solutions Co., Ltd. |
| EY Law Co. | EY Forensic & Integrity LLC |
| EY Immigration Corporation | EY Japan Co., Ltd. |
| EY Social Insurance and Labor Advisors Corporation | EY Japan LLC |
| EY Professional Support Co., Ltd. | |

EY's initiatives for Building a better working world



Diversity, Equity & Inclusiveness (DE&I)

Diversity and inclusiveness are not "nice to haves." They are business imperatives. To achieve our purpose of Building a better working world, EY Japan is working to offer an attractive workplace and create an environment where diverse employees, including women and people from minority backgrounds or with physical or developmental differences, can work comfortably and demonstrate their full potential.



ey.com/en_jp/diversity-inclusiveness



Corporate responsibility

Our people are devoting their knowledge, skills and experience to build a better working world through "EY Ripples," our global corporate responsibility program. If society fails to act, the issues facing the world today are predicted to worsen further by 2030: climate change will push more than 100 million additional people into extreme poverty*¹, two billion people will lose their jobs to automation*², and the population of developing countries will reach 7.2 billion*³.

To help offset these predictions, EY is already working to build a world where everyone can contribute to, and benefit from, sustainable economic growth, and where people's lives are changed for the better. EY is committed to positively impacting one billion lives around the world by 2030 in order to contribute to the achievement of the Sustainable Development Goals (SDGs). To play its part in this mission, EY Japan also promotes activities focusing on the following three key areas: next generation education and professional support, collaboration with entrepreneurs who can impact society and initiatives to achieve a sustainable environment.

Three focus areas of EY Ripples

- ▶ Supporting the next generation workforce
- ▶ Working with impact entrepreneurs
- ▶ Accelerating environmental sustainability

*1 World Bank, Shock Waves
<https://www.worldbank.org/en/topic/climatechange/brief/shock-waves-managing-the-impacts-of-climate-change-on-poverty-background-papers>

*2 Oxford Economics, How Robots Change the World
<https://cdn2.hubspot.net/hubfs/2240363/Report%20-%20How%20Robots%20Change%20the%20World.pdf>

*3 United Nations, Population 2030
<https://www.un.org/en/development/desa/population/publications/pdf/trends/Population2030.pdf>



ey.com/en_jp/corporate-responsibility



Sustainability

Leveraging the experience and expertise accumulated through 20 years of offering sustainability and ESG services, EY helps drive a value cycle where companies accelerate sustainability through business and create business opportunities through improved sustainability.



ey.com/en_jp/sustainability

Awards

"Eruboshi" winner

Ernst & Young Tax Co. was awarded three stars in the "Eruboshi" scheme in October 2023 in recognition of its commitment to empower women in the workplace. "Eruboshi" is the scheme based on the Act on Promotion of Female Participation and Advancement in the Workplace. Certification is awarded by the Ministry of Health, Labour and Welfare to companies that meet relevant criteria and excel in promoting the empowerment of female employees. The evaluation focuses on five criteria, with companies rated on a scale of one to four based on the number of met criteria. In the latest evaluation, EY met all the five criteria of "employment," "continued employment," "working hours and working styles," "ratio of female management" and "diverse career courses," and earned the highest three-star rating.



Ranking 8th overall in Nikkei Woman's 100 Best Companies Where Women Actively Take Part Winner of Gold and Rainbow awards in the PRIDE Index, an indicator for corporate LGBT+ initiatives

EY Japan was ranked 8th overall in the 2023 edition of "100 Best Companies Where Women Actively Take Part*¹." EY Japan has also been awarded Gold in the PRIDE Index, an indicator for corporate LGBT+ initiatives, for seven consecutive years since 2017, and has earned the Rainbow award for the third consecutive year since 2021. In 2023, EY Japan was also named the Company of the Year*² in recognition of its engagement in diversity, equity and inclusiveness (DE&I) across various areas.



*1 Overall rankings based on the results of a survey conducted by Nikkei Woman and Nikkei Womenomics Project (Nikkei Inc. group) on "Female Worker's Workplace Opportunity." EY Japan was placed 8 overall out of 512 companies surveyed, making the top 20 for two years in a row.

*2 British Business Award (BBA) hosted by the British Chamber of Commerce in Japan (BCCJ) recognizes achievements in various Japan-UK business activities and sustainability/corporate responsibility initiatives. The Company of the Year title was the fourth BBA earned by EY Japan, following category wins in 2019 (innovation), 2020 (D&I) and 2022 (DE&I).

Overview of Ernst & Young Tax Co.

Business name

Ernst & Young Tax Co.

Managing Partner

Kazuhiro Ebina

(member of the Tokyo Certified Public Tax Accountants' Association)

Year of establishment

2002

(established in accordance with the revision of the Certified Tax Accountant Law)

Locations

Tokyo head office

Tokyo Midtown Hibiya,
Hibiya Mitsui Tower
1-1-2 Yurakucho, Chiyoda-ku,
Tokyo 100-0006
Tel : 03 03 3506 2411 (main number)

Osaka office

Umeda Hankyu Building
8-1 Kakuda-cho, Kita-ku, Osaka-shi,
Osaka 530-0017
Tel: 06 6315 1181

Nagoya office

JR Gate Tower, 42F
1-1-3 Meieki, Nakamura-ku, Nagoya-shi,
Aichi 450-6642
Tel: 052 588 8855

Fukuoka office

Tenjin Building, 7F
2-12-1 Tenjin, Chuo-ku, Fukuoka-shi,
Fukuoka 810-0001
Tel: 092 752 5222

Okinawa Office

The Terrace Office & Parking, 7F
1-3-12 Omoromachi, Naha-shi, Okinawa
900-0006
Tel: 098 917 5461