

**Samsung Electronics (UK) Ltd**  
**UK Tax Strategy**  
**Financial year ending 31 December 2024**

Business and cultural overview

This UK tax strategy applies to Samsung Electronics (UK) Ltd ("SEUK").

SEUK's principal function is to import, sell and distribute electronic goods in the UK and Irish marketplace. SEUK also provides procurement, quality assurance, research and development and European headquarter services to its Korean ultimate parent company, Samsung Electronics Corporation ("SEC").

The Korean business environment has a very strong focus on hierarchy, centralised decision making and strictly enforced controls and approvals.

Approach to tax risk management and governance

SEUK has developed numerous systems to provide business information, including tax matters, to the European CFO (an SEUK Board Member) and to document required approvals on business decisions. UK tax returns are reviewed and approved by SEUK's Financial Director (who reports to SEUK's Board Members responsible for financial matters).

SEUK is committed to paying the right amount of UK tax at the right time and complying with tax laws applicable in the UK in a responsible manner.

Where the application of tax legislation is complex or uncertain, SEUK engages with professional tax advisors and HMRC in order to reduce the level of tax risk and uncertainty to a low level.

Attitude towards tax planning

SEUK does not engage in tax planning activities that are considered to be artificial, contrary to the intention of the law or against the commercial purpose of a transaction.

Transactions are conducted with Samsung group companies at an arm's length in accordance with OECD principles.

SEUK operates a robust control framework and compliance processes for tax reporting which utilises professional tax advisers and significant investments made in a comprehensive enterprise reporting planning system and a bespoke VAT system.

Working with HMRC

SEUK is open and transparent with HMRC in respect of UK tax matters. We maintain regular communications with our HMRC customer compliance manager.

SEUK's tax strategy is approved by SEUK's Board of Directors.

This policy has been published in compliance with the duty imposed under paragraph 22(2) of Schedule 19 to the Finance Act 2016.

SAMSUNG ELECTRONICS (UK) LTD

Signed: 

Sooman Park, Board Director. 28 June 2024



**Samsung Semiconductor Europe Ltd (SSEL)  
SSEL Tax Strategy  
31 December 2024**

Scope of SSEL's tax strategy report

Samsung Semiconductor Europe Ltd (SSEL) is a private limited company, incorporated in England and Wales. This strategy applies to SSEL in accordance with the duty imposed under paragraph 22(2) of Schedule 19 to the Finance Act 2016.

Business and cultural overview

SSEL's main activity was import and distribution of semiconductor devices and thin-film-transistor (TFT) and liquid-crystal display (LCD) panels until it ceased trading and became a non-trading company since 2015.

In 2015, SSEL transferred all trading activities, including customer lists, assets, novation of contracts and employees to an affiliated company, Samsung Semiconductor Europe GmbH (SSEG), in Germany. The directors intended to liquidate SSEL in 2019 but have not been able to apply for the liquidation due to an ongoing legal claim. The directors' plan to liquidate the company at the earliest available opportunity remains unchanged.

SSEL's immediate parent undertaking is Samsung Electronics (UK) Ltd (SEUK), incorporated in England and Wales. The ultimate parent undertaking and controlling party is Samsung Electronics Co. Ltd (SEC), incorporated in Republic of Korea.

SSEL's tax risk management

SSEL is committed to complying with tax laws applicable in the UK responsibly and paying the correct amount of UK tax in a timely manner. For the purpose of documentation and decision-making, Samsung utilizes its self-developed systems to provide business matters, including tax matters. SSEL's Financial Director reviews and approves UK tax returns and reports to Board Members responsible for financial matters.

SSEL's attitude to tax planning

SSEL does not engage in tax planning activities. SSEL seeks to take advantages from available tax incentives by complying with tax legislation and does not enter into commercial transactions that are deemed to be against the intention of the law.

SSEL's level of risk acceptable for UK taxation

SSEL does not have specified level of acceptable UK tax risk. To apply complex or uncertain tax legislation, SSEL engages, where appropriate, with professional tax advisors and HMRC to minimize the tax risks and uncertainty.

SSEL's relationship with HMRC

SSEL seeks to be open and transparent with HMRC. SSEL regularly maintains communications with its assigned HMRC customer compliance manager.

Samsung Semiconductor Europe Ltd

  
.....

By: 

Date: 