# **International Tax Compliance Documentation**

## **Confidential Legal Instrument**

Nexus Intelligent Systems, Inc.

#### PRELIMINARY STATEMENT

This International Tax Compliance Documentation ("Document") is executed on January 22, 2024, by and between Nexus Intelligent Systems, Inc., a Delaware corporation with principal offices at 1200 Technology Park Drive, San Jose, California 95134 (hereinafter "Company").

## 1. DEFINITIONS

- 1 "Applicable Tax Laws" shall mean all federal, state, local, and international tax regulations governing corporate taxation, including but not limited to:
- a) Internal Revenue Code
- b) Foreign Earnings Repatriation Statutes
- c) International Tax Treaties
- d) OECD Transfer Pricing Guidelines
- 2 "Taxable Jurisdictions" shall include, but are not limited to:
- United States
- United Kingdom
- Singapore
- Germany
- Canada

## 2. TAX COMPLIANCE FRAMEWORK

1 Corporate Tax Structure

The Company maintains a comprehensive tax compliance strategy designed to:

- a) Ensure full legal adherence to all applicable tax regulations
- b) Optimize legitimate tax efficiency
- c) Maintain transparent reporting mechanisms
- d) Mitigate potential international tax risks

## 2 Transfer Pricing Methodology

Nexus Intelligent Systems, Inc. employs arm's length transfer pricing principles consistent with international standards, specifically:

- Detailed transactional documentation
- Independent valuation of intercompany transactions
- Annual comprehensive transfer pricing studies
- Consistent application of OECD recommended methodologies

### 3. INTERNATIONAL REVENUE ALLOCATION

# 1 Revenue Segmentation

The Company's international revenue is categorized as follows:

- North American Operations: 62.4%
- European Market Segment: 22.7%
- Asia-Pacific Region: 14.9%

### 2 Jurisdictional Tax Rates

Effective tax rates are maintained within the following ranges:

- United States: 21.0% 23.5%
- United Kingdom: 19.0% 20.5%
- Singapore: 17.0% 18.5%
- Germany: 30.0% 32.0%
- Canada: 26.5% 28.0%

### 4. COMPLIANCE ATTESTATIONS

## 1 Historical Compliance

The Company certifies:

- a) No outstanding tax assessments
- b) Full compliance with all filing requirements
- c) No pending tax litigation
- d) Timely submission of all required documentation

#### 2 Documentation Retention

Comprehensive tax records are maintained for a minimum of seven (7) years, including:

Annual tax returns

- Supporting financial statements

- Transfer pricing documentation

- Intercompany transaction records

5. RISK MITIGATION STRATEGIES

1 Audit Preparedness

The Company maintains:

- Comprehensive internal audit protocols

- Quarterly tax compliance reviews

- External independent tax advisory relationships

2 Potential Contingent Liabilities

Potential tax exposures are continuously monitored and assessed, with appropriate financial reserves established.

6. CONFIDENTIALITY AND LIMITATIONS

1 This document represents a summary of tax compliance strategies and should not be construed as

definitive legal advice.

2 All information contained herein is strictly confidential and intended solely for authorized review.

7. EXECUTION

Executed by authorized representative:

Dr. Elena Rodriguez

Chief Executive Officer

Nexus Intelligent Systems, Inc.

Date: January 22, 2024

**DISCLAIMER** 

This document is prepared in good faith and represents the Company's best understanding of its tax compliance obligations as of the execution date.