

REQUEST FOR PROPOSAL (RFP)

Corporation Tax Compliance (FY 2025–26), Deferred Tax (Annual IFRS), OECD Pillar Two (UK) Compliance and Review and Update of the Bank's Tax Management Framework Policy.

Union Bank of India (UK) Limited ("the Bank")

RFP Issue Date: 11.02.2026

Proposal Due Date: 20.02.2026

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Financial bid is to be sent separately in a closed envelope to "The Chief Compliance Officer, Union Bank of India UK Limited (Please see Section 13 of the RFP)

Contact Person: Sahil Stanley (Head of Finance) & Rahul Kumar (ED & COO)

1. Introduction

Union Bank of India (UK) Limited ("the Bank") is a wholly owned subsidiary of Union Bank of India ("the Parent Bank"), a public sector bank headquartered in India. The Bank commenced operations on 10 July 2014 and operates under the regulatory framework of the United Kingdom.

The Bank's financial year runs from 1 April to 31 March.

The Bank is required to comply with HMRC Corporation Tax ("CT") regulations and the Companies Act requirements relating to deferred tax accounting under IFRS. The Bank publishes annual statutory IFRS financial statements. Accordingly, deferred tax calculations are required annually.

The Union Bank of India Group exceeds the €750 million revenue threshold and is therefore within the scope of the OECD Pillar Two Global Minimum Tax framework. The Bank's first in-scope period is FY 2024–25 and the first GloBE Information Return (GIR) is due 30 September 2026. This engagement includes end-to-end preparation and filing of the GIR.

The Bank invites proposals from qualified firms to provide: (1) UK Corporation Tax compliance services for FY 2025–26; (2) Annual IFRS deferred tax calculations and disclosures; (3) OECD Pillar Two (UK) impact assessment and compliance services, including GIR preparation and filing; and (4) Review and Update of the Bank's Tax Management Framework Policy.

2. Scope of Work – UK Corporation Tax Compliance (FY 2025–26)

2.1 Tax Accounting Support

- Prepare the annual corporation tax provision calculation and supporting workings.
- Assist with accounting treatment of taxes and drafting CT disclosure notes for statutory accounts.
- Liaise with statutory auditors on tax figures, positions, and supporting schedules.

2.2 Corporation Tax Computation (CTC) and Filing

- Prepare the annual Corporation Tax Computation (CTC).
- Prepare a detailed compliance timetable aligned to the Bank's reporting and HMRC deadlines.
- Collect, validate, and review information required for CTC preparation.
- Provide a draft computation for management review.
- Provide a tax analysis/position letter detailing key assumptions, elections, technical interpretations, and material judgments.
- Advise on, prepare, and submit all relevant claims and elections to HMRC (as applicable).
- Convert the computation and supporting items into iXBRL format.

- Prepare and file the CT600 return together with the iXBRL-tagged financial statements.
- Initiate repayment claims where applicable and support related correspondence.
- Provide updates on HMRC guidance and relevant UK tax legislation during the engagement.
- Provide other HMRC-related support as required (e.g., enquiries, notices, follow-up letters).

3. Scope of Work – Deferred Tax Calculations (IFRS) – Annual Only

As the Bank publishes annual financial statements as per IFRS, deferred tax calculations are required once annually, aligned to the financial year-end (31 March). The Bidder will:

- Prepare the annual deferred tax calculation under IFRS, identifying taxable and deductible temporary differences.
- Prepare Deferred Tax Asset (DTA) and Deferred Tax Liability (DTL) schedules, including roll-forwards and supporting analysis.
- Assess recoverability of deferred tax assets and document evidence and judgments.
- Prepare annual deferred tax disclosures for inclusion in statutory financial statements.
- Provide an audit-ready deferred tax pack and support audit review, including walkthroughs and responses to audit queries.

4. Scope of Work – OECD Pillar Two (UK) Compliance, Impact Assessment (One Time Exercise) and GIR Filing (Annual)

4.1 Background and Requirements

The UK has implemented the OECD Pillar Two Global Minimum Tax framework through the Domestic Top-Up Tax (DTT) and Multinational Top-Up Tax (MTT). The Union Bank of India Group exceeds the €750 million revenue threshold and is therefore in scope. The Bank's first in-scope period is FY 2024–25, and the first GloBE Information Return (GIR) is due 30 September 2026.

The Bank invites proposals for the delivery of a complete, self-contained UK Pillar 2 (GloBE) impact assessment for the FY 2024–25 in-scope period, based on qualified 2025 financial data, and for end-to-end preparation and filing of the GIR. Outputs must be capable of reliance without further in-house build or paid follow-up work.

Proposals must be prepared on the basis that:

- The work will be subject to detailed technical challenge by auditors and internal governance forums.
- Outputs must be capable of reliance without further in-house build or paid follow-up work.
- Conclusions must be final and supportable, not illustrative, indicative, high-level, or hypothetical.

4.2 Minimum Technical Coverage

The scope must include, at a minimum:

- Interpretation and application of UK Pillar 2 primary and secondary legislation applicable to FY 2024–25.
- Interpretation and application of relevant OECD Model Rules, Commentary, Administrative Guidance, and Safe Harbour provisions.
- Identification and resolution of UK–OECD divergences, interpretative ambiguities, and areas of evolving or incomplete guidance relevant to the UK analysis.

The assessment must determine and document the Bank's UK-specific Pillar 2 position, including:

- GloBE income or loss.
- Covered taxes (current and deferred).
- Adjustments, exclusions, elections, and transitional provisions.
- Jurisdictional effective tax rate (ETR).
- Any UK top-up tax exposure (or confirmation of none) and the basis for the conclusion.

Where technical uncertainty exists, it must be explicitly identified, assessed for materiality, and addressed through documented assumptions and reasoned professional judgment.

4.3 Interaction with Global GloBE Rules (Mandatory)

The engagement must explicitly address interaction with the global OECD GloBE framework to the extent necessary to reach robust and defensible UK conclusions, including:

4.3.1 Income Inclusion Rule (IIR)

An assessment of whether low-taxed profits arising in non-UK jurisdictions within the Union Bank of India Group could be subject to top-up tax under an Income Inclusion Rule applied by another group entity, and whether such application would impact, offset, or otherwise affect the UK Pillar 2 position.

This must include:

- analysis of whether relevant group entities are located in jurisdictions that have implemented an IIR,
- consideration of IIR sequencing relative to UK Pillar 2 rules, and
- confirmation of whether any UK top-up tax exposure is affected by IIR application elsewhere in the Group.

4.3.2 Undertaxed Profits Rule (UTPR)

An assessment of whether the Undertaxed Profits Rule could apply to allocate top-up tax to the UK in respect of low-taxed profits arising elsewhere in the Group, where the Income Inclusion Rule is not applied or is applied only partially.

This must include:

- confirmation of whether UTPR conditions are met,
- analysis of whether the UK could act as an allocating jurisdiction, and
- assessment of any resulting UK Pillar 2 tax exposure.

4.3.3 Qualified Domestic Minimum Top-Up Tax (QDMTT)

An assessment of whether relevant jurisdictions have implemented a Qualified Domestic Minimum Top-Up Tax and the extent to which such taxes would collect top-up tax locally, thereby reducing or eliminating exposure under the IIR or UTPR.

This must include:

- identification of jurisdictions with QDMTT regimes,
- confirmation of whether such regimes are “qualified” for GloBE purposes, and
- explanation of how QDMTTs interact with, and affect, the UK Pillar 2 outcome.

4.3.4 Overall Sequencing and Impact

The assessment must clearly explain the sequencing and interaction of IIR, UTPR, and QDMTT mechanisms and explicitly conclude:

- whether and how these rules affect the Bank’s UK Pillar 2 calculations,
- whether any top-up tax is expected to arise in the UK or elsewhere in the Group, and
- the degree of certainty associated with these conclusions.

4.4 GIR Preparation and Filing (End-to-End)

- Define data requirements and implement data intake, validation, and transformation processes for GIR completion.
- Prepare the GIR (including all required schedules, elections, and disclosures) in a format ready for submission.
- Provide an audit-ready GIR submission pack, including calculation models, reconciliations, and evidence trails.
- Support management and auditor walkthroughs of the GIR and underlying computations.
- File the GIR by the statutory deadline (30 September 2026) through the applicable filing mechanism, subject to Bank review and formal sign-off.
- Provide post-filing support for reasonable follow-up queries related to the filed GIR within an agreed period.

5. Scope of Work: Review and Update of the Bank's Tax Management Framework (One Time Exercise)

As part of the scope of services, the appointed consultant shall conduct a comprehensive review of the Bank's Tax Management Framework Policy. The consultant will assess the framework's alignment with current UK tax legislation, regulatory expectations, and industry best practices.

The review & update must include:

- Preparation of a revised and updated Tax Management Framework document, incorporating all proposed changes and ensuring it reflects the Bank's operating model and regulatory obligations.

The consultant is expected to work closely with the Bank's finance and tax teams to ensure that the revised framework is practical, implementable, and tailored to the Bank's specific requirements.

6. Deliverables

6.1 UK Corporation Tax

- Annual corporation tax provision workings and disclosure support.
- Corporation Tax Computation (CTC) with supporting schedules (audit-ready).
- iXBRL-tagged CT600 submission package, including financial statements.
- Claims/elections documentation and submissions (if applicable).
- HMRC query support relating to filed returns/claims within the agreed period.

6.2 Deferred Tax (Annual Only)

- Annual deferred tax calculation pack (DTA/DTL schedules, movements, supporting analysis).
- Annual IFRS deferred tax disclosures for statutory financial statements.
- Audit support pack and walkthroughs.

6.3 Pillar II (UK) and GIR

- Comprehensive UK Pillar 2 impact assessment technical report (FY 2024–25) (One Time Exercise).
- Executive and technical slide packs for governance, audit, and regulatory discussions.
- Detailed calculation models with transparent workings and reconciliations to UK statutory accounts.
- Safe harbour and elections assessment (transitional/permanent as applicable).
- End-to-end preparation and filing of the GIR (due 30 September 2026), including an audit-ready submission/sign-off pack and submission evidence.
- Post-filing support for reasonable follow-up queries related to the filed GIR within an agreed period.

6.4 Tax Management Framework Policy

- Review & draft revised and updated Tax Management Framework document.

7. Methodology and Technical Approach

Proposals must set out a detailed, step-by-step methodology, including:

- Data intake, validation, and transformation processes across UK CT & Pillar 2/GIR workstreams.
- Calculation steps for all Pillar 2 components and how conclusions will be evidenced for audit/governance reliance.
- Approach to elections, exclusions, safe harbours, and treatment of uncertain areas with documented professional judgment.
- Controls to ensure completeness, accuracy, and consistency of models and reconciliations.
- Quality assurance processes, including senior technical review and sign-off.
- Approach to project management, timelines, and stakeholder walkthroughs (Finance, Tax, Risk, Audit, regulators).

Generic, high-level, or illustrative descriptions will not be sufficient.

8. Consultant Qualifications

Proposals must include clear and verifiable evidence of:

- Experience in UK corporate tax compliance for financial institutions.
- Strong IFRS tax accounting capabilities (including deferred tax under IAS 12).
- Expertise in OECD Pillar Two rules and UK implementation, including GIR preparation.
- Experience with multinational banking groups and Indian banking groups with UK subsidiaries.
- Adequate professional indemnity insurance coverage.

Proposals must also include:

- Named team members, roles, responsibilities, and expected senior time involvement (Partner/Engagement Lead and technical review lead).
- Comparable engagement examples/case studies, including Pillar 2 impact assessments.

9. Duration of Engagement

9.1 UK Corporation Tax and Deferred Tax

- UK Corporation Tax compliance and tax accounting support for FY 2025–26 (1 April 2025 to 31 March 2026). Can be extended for a further period of 2 years.
- Annual deferred tax calculation aligned to year-end reporting (31 March 2026). Can be extended for a further period of 2 years.

9.2 Pillar II (UK) and GIR

- Impact assessment and safe harbour evaluation (as required for compliance readiness).
(One Time Exercise)
- Engagement runs through completion and filing of the first GIR due 30 September 2026. Can be extended for a further period of 2 years.

9.4 Tax Management Framework Document

- Review & draft revised and updated Tax Management Framework document (One Time Exercise).

10. Commercial Terms – Strict Fixed Fee

All proposals must be submitted on a strict fixed-fee basis. The fixed fee must cover the entirety of the work required to enable the Bank to meet its obligations, including:

- UK Corporation Tax compliance for FY 2025–26 & Annual IFRS deferred tax calculation and disclosures.
- UK Pillar 2 impact assessment (One Time Exercise)
- End-to-end GIR preparation and filing.
- Review & draft revised and updated Tax Management Framework document (One Time Exercise)

No fee uplifts will be permitted due to complexity, technical uncertainty, or data refinement. Proposals must clearly state pricing assumptions, data dependencies/external constraints, and any exclusions (exclusions undermining compliance or reliance are unlikely to be acceptable).

The fee proposal must include a detailed breakdown of all activities outlined above.

11. Proposal Response Format

- Executive summary.
- Understanding of requirements (UK CT, deferred tax, Pillar 2/GIR).
- Methodology and detailed workplan (step-by-step).
- Deliverables and reliance statement (audit-ready).
- Team and experience (named resources and senior time involvement).
- Relevant case studies.
- Fixed fee pricing (assumptions, dependencies, exclusions).
- Quality assurance and governance approach.
- Risk management and controls.
- Appendices (sample outputs, templates, references).

12. Evaluation Criteria

- Technical capability and robustness of methodology (especially Pillar 2/GIR workstream).
- Demonstrated experience with UK banking tax compliance and IFRS tax accounting.
- Demonstrated ability to deliver audit-ready, reliance-ready Pillar 2 and GIR outputs.
- Quality of proposed team and senior involvement.
- Fixed-fee value for money and transparency of assumptions/exclusions.

13. Submission Instructions

- Submit proposals in PDF to: sahil.stanley@unionbankofindiauk.co.uk & rahul.kumar@unionbankofindiauk.co.uk. However, please note that the Financial bid is to be sent separately in a closed envelope to “The Chief Compliance Officer, Union Bank of India UK Limited, 12 Arthur Street, London EC4R 9AB”.
- Subject: “RFP – CT, Deferred Tax & Pillar 2/GIR– [Firm Name]”.
- Submission deadline: 20.02.2026.
- Proposals must remain valid for 90 days.