

Conning Holdings Limited and Subsidiaries – Global Tax Strategy

Overview

This document sets out the tax strategy of Conning Holdings Limited and its subsidiaries (“CHL”). CHL is committed to full compliance and transparency in all aspects of its statutory tax obligations and reporting to tax authorities. We recognize that we have a corporate and social responsibility and understand that collecting and paying taxes is important to the economies and societies in which we operate. CHL’s tax strategy seeks to establish a clear group-wide approach based on openness and transparency in all aspects of tax reporting and compliance. CHL regards the publication of the information set out below as compliance with the duty to publish a tax strategy as set out in paragraph 16 of Schedule 19 of the Finance Act 2016 for the 2019 financial year.

Tax Planning

Our tax strategy is aligned with our overall business objectives and is focused on ensuring that tax policies and tax risks are managed to provide sustainable outcomes over the long-term. It is of primary importance that CHL pays and collects the correct amount of tax at the right time and to comply with the respective tax laws and reporting requirements across each of the jurisdictions in which it operates. We seek to maintain a tax strategy that promotes transparency and sustainability with policies that:

- Adhere to the legal requirements of the respective jurisdictions (including all reporting, filing, payment and collection obligations);
- Consider our reputation, business strategy, and corporate and social responsibilities;
- Maintain an appropriate tax risk oversight and governance framework;
- Engage appropriate subject matter experts for large or unusual tax items;
- Incorporate tax considerations in our major strategic and operational decision-making; and
- Weigh the potential impact of new legislation or tax policy developments.

Our tax strategy applies to the compliance, payment and reporting of all taxes borne and collected by CHL globally. CHL aims to ensure that its tax policies are consistently applied across its operations and proactively engages with local operational resources to support this objective. It is important that all areas of CHL’s business receive appropriate support from a tax perspective in its commercial activities.

CHL seeks to take an appropriate and balanced approach with tax considerations in structuring its commercial activities; however, we do not undertake aggressive measures with the purpose of tax avoidance. Accordingly, CHL may seek to utilize any appropriate tax incentives or other opportunities to obtain tax efficiencies where such practice:

- Aligns with the intended objectives of tax legislation or respective incentives program;
- Aligns with our business and operational objectives; and
- Does not result in an imbalance in our tax risks (including potential reputational risk or impact on our relationship with tax authorities).

CHL aims to form strong and prudent tax technical positions to support the business, commercial and regulatory context of transactions. Where tax law is unclear or subject to interpretation, professional advice or advance clearance from tax authorities may be sought to ensure that CHL’s position does not lead to conflict.

Governance and Management of Tax Risks

Responsibility for tax strategy, management of tax risks, and administration of the governance framework resides with CHL's corporate finance organization, which reports to the group Chief Financial Officer. All CHL subsidiaries are responsible for complying with the principles and strategy set out in this document. Independent tax advice is often sought from external tax advisors, particularly on matters requiring specialized expertise. The group Chief Financial Officer is responsible for the appointment of external advisors, subject to the approval of the CHL Board of Directors. CHL outsources the preparation of all tax compliance filings to external tax advisors to ensure it remains compliant with all local tax filing requirements.

We look to manage tax risks in a similar way to other operational risks across the group to align with CHL's group-wide risk management framework and ensure that the level of tax risks is in line with CHL's overall risk appetite. There is also an independent operational risk group that monitors and reports on tax risks, with any key risks and issues escalated to the CHL Risk Committee and the CHL Audit Committee. We actively seek to identify, evaluate, monitor and manage tax risks, which can be generally categorized as follows:

- Tax reporting and compliance risks, which includes risks associated with our ability to meet our obligations for fair and accurate tax reporting, payment, collection, filing of returns and elections, and other compliance requirements on a timely basis.
- Transaction-related risks, which includes the risk that actions are taken without appropriate consideration for potential tax consequences or situations where tax law is unclear or subject to interpretation.
- Reputational risks, which look at a broader impact of tax risk on our key stakeholders, including: clients, shareholders, business partners, tax authorities, and the markets where we operate.

There continues to be significant changes in tax legislation, and a corresponding increase in the complexity of tax risks. We seek to manage this uncertainty by seeking the appropriate expert advice and proactively engaging in discussions to understand and manage the impact on our business.

Relationship with Tax Authorities

As an organization, CHL aims to be honest, fair and truthful in all its dealings, and these principles of integrity are reflected in its relationship with tax authorities. CHL is committed to maintaining an open and cooperative relationship with tax authorities in all jurisdictions where we operate. CHL seeks to make full and accurate disclosures in all filings and correspondence with tax authorities. We take a proactive approach on all tax matters and seek to manage any matters in a timely and cooperative manner. Where tax inquiries or audits are opened, we adopt a proactive approach to the provision of information to the relevant tax authorities to aid the resolution of any matters under review. We support initiatives to enhance transparency of taxation matters, including OECD measures to increase collaboration between different tax jurisdictions.