

## **UK Tax Strategy**

**Date: 12 November 2024**

### **Introduction**

This tax strategy applies to the UK companies in each UK sub-group of Premia Holdings Limited (“the Premia UK businesses”) which is the ultimate parent and controlling company of the UK entities.

The Premia Group is focused on sourcing, structuring and servicing run-off business. The UK businesses operate in the reinsurance industry focusing on acquiring and reinsuring insurance and reinsurance run-off books of business. The Premia UK Holdings 1 Ltd sub-group primarily serves run-off business sourced from Lloyd’s of London syndicates and related capital providers. The Premia UK Holdings 2 Ltd sub-group manages general insurance liabilities arising from the company market.

The purpose of this document is to communicate our approach to tax to all stakeholders and meet requirements of Schedule 19 of the Finance Act 2016.

### **Our commitment to compliance**

Our commitment to compliance means that we will endeavour to be compliant with all aspects of UK tax law. For us, compliance means paying the right amount of tax in the right place at the right time and claiming reliefs and incentives in line with the provisions of the tax law, where available.

### **Our approach to the management of tax risk**

Further to the wider comments on tax risk acceptance and management in this strategy, the approach to tax risk is aligned to the approach taken for broader risks faced by the business' i.e. tax isn't treated differently to any other risk.

The process of risk acceptance and risk management is addressed through a framework of policies, procedures and internal controls. All policies are subject to approval and ongoing review by the Board and relevant Board committees. Our approach to tax risk management is no different and is fully aligned to the wider business strategic objectives. We partner with all stakeholders, including HMRC, in a transparent way to ensure an appropriate approach to tax risk management.

Ultimately tax governance is the responsibility of the UK Boards who have approved this tax strategy and is monitored by the Executive Committee and Audit Committee, with day-to-day management delegated to the CFO of the UK businesses and the respective UK Finance Teams. The UK businesses are supported by external advisors where required.

The UK insurance industry is subject to extensive regulatory rules and requirements. We are regulated by the Financial Conduct Authority and the Prudential Regulation Authority. We also adhere to Solvency II regulations for insurers which establishes governance and risk

management as a central pillar of the framework and requires the UK businesses to have an effective system of governance including risk management in place. The Lloyd's business also adheres to rules and regulations set by Lloyd's.

The UK businesses are also subject to the Senior Accounting Officer regime and have undertaken a risk-based assessment to review tax accounting arrangements currently in place. Tax risks and controls are documented in our tax risk register which is closely monitored and updated on an annual basis. Any material tax risks are reported to the Executive Committee, Audit Committee and UK Boards as appropriate.

We use independent external advisors to provide specialist support for matters which may impact our tax filing obligations. We seek to use HMRC approved arrangements to facilitate tax risk management and achieve certainty. The nature of our business means that transaction risk is a high priority. For all material changes, we engage with external tax advisors to ensure that any tax risk is fully considered.

### **Tax risk appetite & tax planning**

Although the UK businesses seek to be effective and efficient with tax planning, such as utilising legitimate tax incentives (e.g. R&D tax credits), we are committed to paying the appropriate amount of tax in compliance with tax legislation. We only undertake planning in the context of wider business and commercial activity. Tax is not the principal driver of transactions but one of many factors that are considered.

Where planning is undertaken, external tax advisors are consulted to ensure that the tax technical interpretation is fully aligned to the intentions of legislation. We therefore adhere to the spirit as well as the letter of the law in interpreting tax legislation.

We take a zero-tolerance approach to the facilitation of tax evasion and will not engage in aggressive tax avoidance schemes.

### **Our approach towards our dealings with HMRC**

We endeavour to maintain a transparent, co-operative and collaborative approach to our dealings with HMRC. If we identify any issue in our tax compliance obligations, we will voluntarily disclose this to HMRC on a timely basis.