RiverStone International – UK tax strategy

Scope

This UK tax strategy applies to UK resident corporations in each UK sub-group of RiverStone International ("the UK businesses").

The UK businesses regards this document as complying with the requirements of Schedule 19 to the Finance Act 2016 (UK) to publish a UK tax strategy.

Overview

The UK businesses operate primarily in the insurance industry and are therefore subject to stringent regulatory rules and requirements in the UK.

The tax affairs of the UK businesses are managed in a way which takes into account their corporate reputation as well as the best interests of the UK businesses and various stakeholders, including shareholders and employees. Set out below is the UK tax strategy as it relates to UK tax risk management and governance, UK tax planning, and relationships with UK tax authorities.

UK tax risk management and governance

Day to day management of tax affairs and tax risks, and primary responsibility for delivering the UK tax strategy, sit with the CFO of the UK businesses. The CFO relies on their own expertise, other in-house resource and external advisors.

An important component of the UK tax strategy is risk management. Enterprise risk management architecture that is a requirement of Solvency II insurance regulations is fully embedded in the UK businesses. In addition, the businesses maintain internal control frameworks which comply with the UK's Senior Accounting Officer legislation which requires businesses to establish and maintain appropriate tax accounting arrangements. The control frameworks include measures intended to identify, assess and manage tax risks and to ensure compliance with tax reporting obligations. Compliance with these control frameworks is reviewed at regular intervals by management of the UK businesses and/or by their internal audit teams. The UK businesses also have procedures designed to prevent persons associated with the UK businesses from committing tax evasion facilitation offences as defined in the Criminal Finances Act 2017.

UK tax planning and tax risk appetite

UK businesses are committed to fully complying at all times with their tax payment and reporting obligations.

The CFO of the UK businesses seeks to ensure that the tax implications of all material commercial transactions are considered by in-house resource and external advisors, where appropriate. The UK businesses seek to be efficient in their tax affairs and may consider planning to make use of available tax reliefs, allowances and other benefits, but only in accordance with applicable laws and regulations. The UK businesses do not engage in artificial or abusive tax avoidance transactions.

The UK businesses seek to avoid uncertainty and unexpected results in their tax positions. In any instances where tax laws are unclear or their application is uncertain, the UK businesses will, with support from external advisors when appropriate, fully analyse and understand any tax risks. The UK businesses are not prescriptive in terms of the level of acceptable tax risk in respect of any particular matter as each matter is assessed based on its specific facts and circumstances.

Relationship with UK tax authorities

The UK businesses are committed to maintaining a transparent and cooperative relationship with HMRC (the UK tax authority). When appropriate, representatives of the UK businesses meet with the HMRC Customer Compliance Manager in order to maintain real time engagement regarding business developments and risks. The UK businesses are committed to ensuring that they are responsive to requests for information by HMRC and that the information they provide is accurate and complete. Where appropriate, the UK businesses will seek advance tax rulings from HMRC prior to undertaking certain transactions.