

RiverStone UK – UK tax strategy

Scope

This UK tax strategy applies to all UK resident corporations in the RiverStone International Group. This UK resident corporations in the RiverStone International Group consist of RiverStone Holdings Limited (“RHL”) and Advent Capital Holdings Limited (“ACH”) and all the UK resident subsidiaries of these companies (together “RiverStone UK”).

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

Overview

RiverStone UK operates primarily in the insurance industry and is therefore subject to stringent regulatory rules and requirements in the UK.

The tax affairs of RiverStone UK’s businesses are managed in a way which takes into account their corporate reputation as well as the best interests of RiverStone UK businesses and various stakeholders, including shareholders and employees. Set out below is RiverStone UK’s 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 of RiverStone UK businesses, and primary responsibility for delivering the UK tax strategy, sits with the CFO of RiverStone UK. The CFO relies on the expertise of in-house resource and external advisors. The CFO reports on material tax matters to RiverStone UK’s Board’s of Directors at regularly scheduled Board meetings.

An important component of RiverStone UK’s tax strategy is risk management. Enterprise risk management architecture that is a requirement of Solvency II insurance regulations is fully embedded in the RiverStone UK businesses. In addition, RiverStone UK 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 RiverStone UK businesses and/or by their internal audit teams. The RiverStone UK businesses also have procedures designed to prevent persons associated with the RiverStone UK businesses from committing tax evasion facilitation offences as defined in the Criminal Finances Act 2017.

UK tax planning and tax risk appetite

RiverStone UK businesses are committed to fully complying at all times with their tax payment and reporting obligations, including country-by-country reporting requirements.

The CFO of the RiverStone UK business seeks to ensure that the tax implications of all material commercial transactions are considered by in-house resource and/or external advisors. RiverStone 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. RiverStone UK businesses do not engage in artificial or abusive tax avoidance transactions.

RiverStone 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, RiverStone UK businesses will, with support from external advisors when appropriate, fully analyse and understand any tax risks. RiverStone 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

RiverStone UK businesses are committed to maintaining a transparent and cooperative relationship with HMRC (the UK tax authority). When appropriate, representatives of RiverStone UK businesses meet with the HMRC Customer Compliance Manager in order to maintain real time engagement regarding business developments and risks. RiverStone 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, RiverStone UK businesses will seek advance tax rulings from HMRC prior to undertaking certain transactions.