

UK Tax Strategy

Introduction

The purpose of this document is to set out the tax strategy for all UK companies and UK sub-groups within the FNZ Group Limited (“FNZ”) Group, in accordance with Schedule 19 of the Finance Act 2016 paragraphs 19(2) and 22(2).

FNZ is a market leading provider of end-to-end technology and highly scaled industrial strength back-office investment services to the financial services and wealth management sectors. Our services support a wide range of asset types and work across a range of currencies and markets to drive our customers’ businesses around the globe. Our service platform combines cutting edge software, industrial scale, secure infrastructure and efficient asset servicing to offer cost-effective, bespoke wealth management solutions.

FNZ seeks to comply with all applicable tax laws, rules and regulations without exception and to paying the amount of tax legally due in any territory in accordance with rules set by the relevant authorities. FNZ is committed to being characterised as a good corporate fiscal citizen.

Tax Risk Management and Governance

FNZ is committed to firm-wide governance and a risk management framework, which includes the management of tax risks. Tax risks are assessed and monitored by the tax team (“Group Tax”), which are reported to the relevant Boards periodically, and by exception if appropriate.

FNZ has a low appetite for tax risk and aim to ensure it is aware of risks in relation to tax compliance, financial reporting, tax planning, tax audits and legislative developments. FNZ will comply with the tax laws, rules and regulations in the jurisdictions the FNZ Group operates. In particular, tax returns, claims, elections and payments should be made accurately and on time, while interest charges and penalties will be avoided or minimized.

The Group Tax Policy has been approved by the relevant Boards and sets out the requirements to be applied

across the FNZ Group in the day to day oversight and control of the Group’s tax matters. Group Tax are responsible for the day to day management of tax affairs and ensure this policy is implemented across all jurisdictions.

Tax Authorities

FNZ recognises the important role of all tax authorities in the various jurisdictions in which the FNZ Group operates. FNZ seeks to have an open, collaborative and transparent relationship with HMRC. FNZ may meet with HMRC to discuss transactions or issues where there is potential for the tax treatment to be uncertain. FNZ recognises that on occasion there will be areas in which the legal interpretation may differ from that of HMRC and where the tax treatment of activities and transactions is uncertain. In such cases, FNZ will engage in proactive discussions with HMRC with a view to bringing matters to a reasonable conclusion as rapidly and equitably as possible.

Tax Planning and Risk

FNZ undertakes tax planning only where it supports genuine commercial activity but in doing so aims to be compliant with all relevant tax laws and practices. FNZ does not enter into artificial arrangements in order to avoid taxation, nor does it undertake aggressive tax planning. Transactions between FNZ Group companies must comply with the arm’s length principle as defined in the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations and included in Article 9 of the OECD Model Tax Convention.

FNZ seeks to ensure that transactions achieve a tax result which is consistent with the underlying economic consequences and are consistent with the spirit and the letter of the law. When deemed necessary, external advice will be sought in relation to areas of complexity or uncertainty to support FNZ in understanding the tax consequences of its commercial and economic activities and complying with those effects.

FNZ recognises the risk of facilitation of tax evasion. Each business is required to consider appropriate controls to mitigate this risk. In addition, staff are reminded of the risks of facilitation of tax evasion in training, as appropriate.