

IntegraFin Holdings plc

Group Tax Strategy – Financial Year 2018

SCOPE

IntegraFin Holdings plc (IHP) is the holding company for all of the companies in the IntegraFin Group (the Group). This tax strategy applies to IHP and all of its direct and indirect subsidiaries. References to IHP or the Group are to all these entities.

The strategy applies to UK Taxation as defined within the UK tax strategy legislation (see para 15, Sch 19 FA16). The strategy also covers worldwide taxation, in respect of which the Group has responsibilities.

This strategy applies from the date of publication until it is superseded.

OBJECTIVES

The Group's tax strategy is to comply fully with all statutory obligations, make full disclosure to tax authorities in all appropriate jurisdictions, and to pay all tax when it is due.

The Group will follow local and international rules concerning reporting about clients' investments to tax authorities.

The Group's tax affairs are managed to the same high ethical, legal and professional standards as the delivery of the Group's services to clients. The Group aims to comply with both the spirit and letter of the law in all tax matters, and to achieve certainty in the Group's tax affairs.

GOVERNANCE

The Board of IHP assumes ultimate responsibility for IHP's tax strategy and compliance. Executive responsibility for tax matters, ensuring compliance with the respective Group entity taxation regimes, is assigned to the IHP Group Director & Chief Financial Officer (CFO). The CFO keeps the Board informed of all key tax events, and any relevant changes to taxation regulation that may materially affect the Group and its operations.

The Group's tax strategy is reviewed annually. It is supported by a Tax Governance Framework, which aligns to the Group's wider risk and control framework. Independent monitoring and reporting of tax risks and controls is supported by Group Risk Management, and key risks and issues related to tax are escalated to and considered by the Board and IHP's Audit and Risk Committee.

IHP's Audit and Risk Committee monitors the integrity of financial reporting systems, internal controls and risk management frameworks, expressly include those elements relating to taxation.

Responsibility for the tax strategy, the supporting governance framework and management of tax risk ultimately sits with the Chief Accountant (CA). Day-to-day responsibility for each of these areas sits with the Group Tax Specialist, who reports to the CA, and manages the day-to-day activities of the Tax team. The Tax team is staffed with appropriately qualified individuals, and is assisted by external consultants who specialise in the taxation of long-term insurance business.

TAX RISK MANAGEMENT

The Board recognises that the Group is exposed to a variety of tax risks. These are grouped under the following headings:

Tax compliance and reporting risks

The risks associated with compliance failures, such as submission of late or inaccurate returns, the failure to submit claims and elections on time, or where finance or operational systems and processes are not sufficiently robust to support tax compliance and reporting requirements.

Transaction risks

The risk that transactions are carried out, or actions are taken, without appropriate consideration of the potential tax consequences, or where advice taken is not correctly implemented.

Operational risk

The risk that the day-to-day activities of the Group trigger an unintended tax liability.

Tax risk is managed by the Group, consistent with its objective of achieving certainty in its tax affairs, and to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

Control and escalation processes have been put in place to identify, quantify and manage key risks.

As far as is reasonably practicable, tax risk is controlled by ensuring that reasonable care and oversight is applied in relation to all processes which could materially affect compliance with tax obligations.

The key risks are monitored, and horizon scanning for business and legislative changes which may impact them is undertaken, such that changes to processes or controls are made when required.

Processes relating to different taxes are allocated to appropriate process owners. The Group has appropriately qualified in-house taxation expertise, and engages external tax consultants for the provision of advice and additional technical support when required.

The Tax team undertakes or assists with tax filings, manages relationships with tax authorities, and assists with various forms of tax and financial reporting.

Activities include reporting the Group's tax position, and ensuring understanding and compliance with tax obligations in each jurisdiction in which the Group operates.

Where appropriate, the Group will engage with tax authorities to disclose and resolve issues, risks and uncertain tax positions. External advice is always obtained when a material transaction is being considered.

TAX PLANNING

The Group's attitude towards tax planning is consistent with the objectives set out above. The Group does not engage in tax planning beyond conventional tax management. When entering into commercial transactions, the Group seeks to take advantage of tax incentives, reliefs and exemptions consistent with the spirit of the tax legislation.

Tax advice is not a component of the Group's product offering. It is the responsibility of Financial Advisers that use the Transact platform to ensure they are acting in accordance with their clients' needs.

TRANSPARENCY, COMPLIANCE AND RELATIONSHIPS WITH TAX AUTHORITIES

The Group supports an open and transparent relationship with HMRC, and other tax authorities as relevant, based upon mutual trust and respect which will enable constructive dialogue, the correct delivery of taxes due by the Group, and provision of information to our clients to enable them to report and pay taxes due as appropriate.

Any unintended errors in submissions to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

The Group consults HMRC's Customer Compliance Manager for the Group whenever appropriate. Members of the Tax team attend relevant events run by HMRC.

The Group does not tolerate tax evasion, nor does it tolerate the facilitation of tax evasion by any person(s) acting on the Group's behalf.

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The holding company of the Integrated Financial Arrangements Ltd group of companies.