SCOR Operations in the UK Tax Strategy

Version 1.0 – 31 October 2023

To be published on the internet (excluding internal SCOR governance pages)

ABOUT THE DOCUMENT

Document Information

Properties

The document properties are:

Owner	Group Chief Financial Officer (hereafter "Group CFO")
In force from	08.11.2022
Author	SCOR UK Finance
Approved by	Board of Directors of SCOR SE and subsidiary boards

Review process

This Tax Strategy for SCOR's UK operations (the "UK Tax Strategy") shall be reviewed and approved annually by the respective company Boards.

The table below outlines the changes included in the Board approved versions of this policy (including the present version).

Version & date	Reviewer(s)	Main changes
Version 1.0	Board of	Approval of the Policy
(25.10.2017)	Directors of	,
	SCOR SE	
Version 1.0	UK CFO & UK	
(11.10.2018)	Compliance	Removal of explict reference to "Three Lines of Defence" in Tax Risk Management section
	Officer	Botonico III Tax Misi Management Section
Version 1.0	Board of	
(23.10.2018)	Directors of	Approval of the Policy
	SCOR SE	
Version 1.0	Board of	
(18.10.2019)	Directors of	Approval of the Policy
	SCOR SE	
Version 1.0	Board of	
(05.11.2020)	Directors of	Approval of the Policy
	SCOR SE	
Version 1.0	Board of	
(05.11.2021)	Directors of	Approval of the Policy
	SCOR SE	
Version 1.0	Board of	
(08.11.2022)	Directors of	Approval of the Policy
	SCOR SE	
Version 1.0	Board of	
(09.11.2023)	Directors of	Approval of the Policy
,	SCOR SE	

Scope

The UK Tax Strategy applies to all SCOR Group subsidiaries with a taxable permanent establishment in the United Kingdom, being SCOR SE, SCOR UK Company Ltd, SCOR Europe SE, SCOR Underwriting Ltd, SCOR UK Group Ltd, SCOR Services UK Ltd, SCOR Lime St Ltd, SCOR Asia House GP Ltd, SCOR

Asia House Ltd, SCOR Asia House LP, SCOR Investment Partners UK Ltd, The SCOR Managing Agency, Blue Star Syndicate Management Ltd and Accorde Management Services Ltd (hereafter called the SCOR's UK Operations or "SUO").

Applicability

The policy applies to all the relevant UK taxes within scope of the legislation affecting SCOR, being: income tax, corporation tax, value added tax, employment (PAYE) taxes & national insurance, diverted profits tax, insurance premium tax, stamp duty land tax, stamp duty reserve tax, customs duties, excise duties.

Exception process

Please send your requests for any exception including the reasons why an exception is needed to the Author of this Policy: aaygun@scor.com.

Change requests

Please send your direct change requests, including the reasons for change to: aaygun@scor.com

SCOR's UK Operations' Tax strategy

SCOR's UK operations, referred to collectively as "SUO" (or "we"), strive to be transparent and compliant in respect of UK taxation matters, and to pay the appropriate tax in the UK. This Tax Strategy is being published in accordance with Schedule 19, Finance Act 2016 and covers all SUO, both companies and permanent establishments.

Governance in relation to UK taxation

Responsibility for SUO's tax strategy ultimately rests with the Board of SCOR SE ("Group Board"). The respective SUO Boards and Branch Managers hold responsibility for implementing this strategy and ensuring compliance with all relevant UK tax laws, with appropriate oversight from the Group Board. Responsibility for tax matters in the UK lies with the Chief Financial Officer ("CFO") of the relevant UK company or permanent establishment, with the CFOs being supported by the UK Tax Manager who deals with the day-to-day management of UK tax affairs. SCOR's Tax Department is led by the Group Tax Manager based in Paris. Tax risk is monitored by SCOR's Tax Department, including the UK Tax Manager, and is discussed regularly with the UK CFO.

The UK CFO is responsible for notifying the relevant Board and/or Branch Manager of any significant tax matters which impact SUO.

Tax Risk Management

We know that it is not possible to eliminate tax risk entirely, but we believe that the exposure to tax risk should be managed closely so that it is reduced to acceptable levels. All material tax risks are identified and managed via our internal controls and processes and where relevant reviewed by internal and external audit.

SUO operates various integrated control processes to manage risk, including tax risk, involving the following:

- Business Process Owner
- Internal Control System Competence Centre (reporting to Group Risk Management) and SCOR's Tax Department
- Group Internal Audit

We consider our tax affairs to be relatively straightforward, however we do recognise that some areas of tax law are complicated and open to interpretation and so we would seek the advice of external advisors on significant or complex issues.

Level of Acceptable Tax Risk

We are not prescriptive in terms of what constitutes an acceptable level of tax risk and each tax matter is assessed on its specific facts and circumstances in line with our strategic objectives. However, we have a low appetite for tax risk. We seek to take appropriate steps to mitigate the material tax risks and remediate issues identified to ensure key controls operate within acceptable tolerance levels. We take very seriously both our reputation and our brand and take the necessary steps to maintain both.

Risk tolerance for tax compliance penalties or material financial statement tax misstatements is low.

Attitude towards tax planning

We do not engage in tax planning other than that which supports genuine commercial activity, in line with the group <u>Code of Conduct</u> (copy included in the Board Appendices). Whilst we strive to be efficient with our tax affairs and we will make use of available reliefs and allowances, our focus is on ensuring compliance with all relevant tax laws and practices.

Approach to dealing with Tax Authorities

SUO maintains an open and transparent relationship with HM Revenue & Customs ("HMRC"). We display respect, integrity and professional cooperation in our dealings with HMRC. In particular we:

- aim to work in real time with HMRC where possible.
- inform HMRC on group changes affecting UK entities.
- seek advance clearances where necessary on complex areas of tax law or when new tax laws are introduced; and
- respond promptly and with full disclosure to any enquiries that are raised by HMRC.

Overall, we strive to be transparent in our dealings with HMRC, conduct all our tax matters in a professional manner and pay the appropriate level of UK taxation in line with our low appetite for tax risk.