



Tax Policy

Geographical Area:	Europe
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Date:	15.12.2017
Version Status:	v 1.3
Document Location:	TWG Intranet
Review date:	30.11.2018
All policies are subject to local laws where the Company operates. <u>These policies are subject to change without prior notification</u>	

1. Introduction

This Document sets out the Tax Policy of TWG Europe (TWGE)

2. Scope

The Tax Policy applies to all operations of TWGE. For these purposes TWGE means TWG Europe Limited and its subsidiaries. The principal operating companies of TWGE are:

London General Insurance Company Limited (“LGI”);
London General Life Company Limited (“LGL”); and
TWG Services Limited (“TWGS”).

3. Regulatory, Legislative and Corporate Context

TWGE is subject to the legal and regulatory requirements of each territory in which it operates and does business, along with European-wide legislation and Directives. Specifically TWGE is subject to the UK tax authority.

This strategy is aligned with TWGE's corporate policies and its codes of practice and operation

4. Policy Statements and Principles

Board ownership

This document is approved, and ultimately owned and overseen by the Operating Board of TWGE.

Compliance

TWGE actively seeks to comply with tax law and practice in all of the territories in which it operates, including the UK which is its main European place of business.

Compliance for TWGE means paying the right amount of tax, in the right place, at the right time and involves disclosing all relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where available.

Tax affairs

In structuring its commercial activities TWGE will consider the tax laws of the countries within which it operates with a view to maximising value on a sustainable basis for its shareholders.

TWGE will seek external advice as appropriate when undertaking tax planning and when material changes to tax legislation or their application arise, to ensure correct understanding and application.

Tax planning will have commercial and economic substance and will have regard to the potential impact on TWGE's reputation. TWGE will not undertake planning that is contrived or artificial.

Risk management

TWGE has dedicated tax management resource with responsibility for all taxation matters and reporting to the Chief Financial Officer.

Risks will inevitably arise occasionally in relation to the interpretation of tax law and the nature of tax compliance arrangements. TWGE actively seeks to identify, evaluate, manage and monitor tax risks to ensure they remain in line with the group's risk appetite. Where there is significant uncertainty and / or complexity in relation to a risk, external advice will be sought.

Tax authority interaction

TWGE is committed to the principles of openness and transparency in dealings with tax authorities. TWGE will engage with tax authorities with honesty, integrity, respect and fairness and in a spirit of co-operative compliance. TWGE may at times disagree with a ruling or decision of a tax authority but will first seek to resolve any disputed matters through transparent discussion and negotiation.

Board ownership

This strategy is aligned with all our codes of practice and operation as detailed on our intranet and is approved, owned and overseen by the Board of TWG Europe Limited. The CFO does and will continue to report to the Board on taxation matters that impact the business; highlighting risks, mitigation strategies and opportunities.

TWGE consider this publication as complying with the duty under paragraph 16(2) and paragraph 25(1) of Schedule 19 of the Finance Act 2016.

5. Responsibilities

The Board of TWGE has overall responsibility for this policy and the related tax strategy.

The Chief Financial Officer is responsible for the implementation of this policy, the tax strategy, and their effectiveness.

The Corporate Tax Manager, Europe is responsible for the overall awareness and application of this policy and will oversee adherence at an operational level through internal systems and controls.

The Legal, Risk and Compliance departments provide support to the Corporate Tax Manager in effecting the requirements of this policy.

All staff are responsible for their adherence to this policy, its related strategy,, processes and controls and for reporting any issues.

6. Reporting

The Corporate Tax Manager shall report promptly to the Chief Financial Officer any material issues arising in respect of this policy and the tax strategy.

The Chief Financial Officer shall in turn report periodically to the TWGE Management Audit & Risk Committee and to the TWGE Operating Board and on an ad hoc basis as appropriate, and at least annually.

7. Document and Policy Review

This document shall be maintained and kept up to date by the Corporate Tax Manager. A formal review of this document will be conducted at least annually by the Corporate Tax Manager and the outcome of such review will be reported by the Chief Financial Officer to the TWGE Management Audit & Risk Committee and to the TWGE Operating Board. The review will include an assessment of the key controls and the adequacy and effectiveness of the tax strategy.

Any changes to the tax strategy require approval by the TWGE Operating Board.

8. Publication

This document shall be published internally via the TWGE intranet and the tax policy shall be published publicly on TWGE's web site, and refreshed regularly (normally annually and within a maximum of 15 months of the previous current version).

Document Change History

This change history must be updated when any edits are made to this document. Any changes are subject to the review and the approval of the document owner prior to formal approval.

Amendments

This Document has been amended by:

Name	Changes made	Date of Approval	Version/ Status
Stuart Wiles	Created - first version	24 November 2017	Draft v 1.1
David Owen		28 November 2017	Draft v1.2
Stuart Wiles		15 December 2017	Final v 1.3

Approvals

This Document has been approved by:

Name	Signature	Changes made	Date of Approval	Version/ Status
TWG Europe Operating Board	DM OWEN CO SECREARY	No changes	18th December 2017	v1.3