

## **Atrium Group Tax Strategy Statement FY 2021**

Atrium Underwriting Group Limited's tax strategy, which is approved by AUGL's Board, is aligned to our group policies and our Code of Conduct.

### **Tax Risk Appetite:**

- We are committed to complying with all tax laws, rules, and regulations applicable to the Atrium Group.
- In evaluating potential transactions, we consider the overall commercial, financial and tax aspects.
- Where there is uncertainty or complexity in relation to a tax risk, we may seek external advice and, where appropriate, we may obtain tax clearances from relevant tax authorities.

### **Approach to Risk Planning:**

- As part of our compliance process, we aim to pay the right amount of tax in the right place at the right time. This involves disclosing the relevant facts and circumstances to tax authorities and claiming reliefs and incentives where available.
- In managing our business activities, we consider, among other factors, the tax laws of the countries in which we operate with a view to maximising value on a sustainable basis for our shareholders. We do not enter or structure transactions that are contrived, artificial or that lack a business purpose.

### **Tax Risk Management and Governance:**

- In line with the Group's risk management approach and our policies, we proactively seek to identify, evaluate, manage, monitor, and mitigate tax risks.
- We review intercompany transactions to ensure compliance with arm's length principles as defined by the OECD transfer pricing standards and relevant local law.
- The governance and controls around our tax-related risks are set by the Board of Directors and monitored by the Risk Committee and the Audit Committee of the Board of Directors, in addition to our external auditor's oversight.

### **Relationships with Tax Authorities:**

- We engage with all tax authorities, with honesty, integrity, respect, and fairness and in a spirit of cooperative compliance.
- Should we disagree with a ruling or decision of a tax authority, we will first consider resolving any disputed matters through proactive and transparent discussion and negotiation.

The publication of this tax strategy statement is intended to comply with Paragraph 19 (2), Schedule 19 of the Finance Act 2016 in the United Kingdom.