

AssuredPartners London

UK Tax Strategy

YE December 2019



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1. INTRODUCTION

This document, approved by the board of AssuredPartners Holdings Limited on behalf of the UK group (“AssuredPartners” / “The Group”), sets out the approach to conducting its tax affairs and dealing with tax risks for the year ending 31 December 2019.

The Group regards the publication of this UK tax strategy as complying with its duty under the Finance Act 2016, Schedule 19, paragraph 16(2).

The UK tax strategy applies for the financial year ended 31 December 2019 and will be reviewed annually. References to ‘UK Tax’ are to the taxes and duties set out in Finance Act 2016, Schedule 19, paragraph 15(1) which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to ‘tax’, ‘taxes’ or ‘taxation’ are to UK tax and to all corresponding worldwide taxes and similar duties in respect of which the Group has legal responsibilities.

Taking each of the requirements of paragraph 16 (2) of Schedule 19 in turn:

2. APPROACH OF THE UK GROUP TO RISK MANAGEMENT AND GOVERNANCE ARRANGEMENTS IN RELATION TO UK TAX

The AssuredPartners group includes the following UK entities:

- AssuredPartners Holdings Limited - #08116277
- AssuredPartners London Limited - #04152499
- Hettle Andrews & Associates Limited - #04728481

2.1 Governance

Ultimate responsibility for the Group’s UK tax strategy, the supporting governance framework and management of tax risk remains with the relevant UK Boards and is subject to UK Board approval. Day to day, UK tax risk is overseen by senior members of the relevant Group entities’ finance teams and the Group’s Vice President of Corporate Tax. The Group’s tax strategy aligns to the Group’s wider risk and control framework. Key risks and issues related to tax are escalated to and considered by the Group’s Audit Committee.

2.2 Tax risk management and reduction

The Group is exposed to a variety of tax risks as follows:

- *The Group aims to manage tax risk in a similar way to any area of operational risk across the Group. The business is supported by oversight functions, including Tax and Internal Audit functions*
- *The Group routinely engages UK third party accounting firms to aid in the tax compliance, audit of financials, and the implementation of tax strategies as needed.*
- *As needed, the Group looks to engage with tax authorities to disclose and resolve issues, risks and uncertain tax positions. As a result, at any given time, the Group may be exposed to financial and reputational risks arising from its tax affairs although the tax risk management procedures in place mean that these risks are carefully controlled*

3. ATTITUDE OF THE GROUP TO TAX PLANNING (SO FAR AS AFFECTING UK TAX)

The Group acknowledges its responsibility to pay the right amount of tax, as defined by all rules and regulations, in each of the principal jurisdictions in which it operates.

The commercial needs of the Group are paramount and all tax planning must have a business purpose. The economic benefits associated with tax planning must never override compliance with all applicable laws. The Group's Vice President of Corporate Tax will ensure that tax arrangements are well-understood and based on soundly researched principles.

All material tax arrangements are vetted through local jurisdiction third party accounting and legal firms.

4. LEVEL OF RISK IN RELATION TO UK TAX THAT THE GROUP IS PREPARED TO ACCEPT

The Group's tax risk appetite requires that, where tax law is unclear or subject to interpretation, the level of risk which the group accepts in relation to UK tax is consistent with its overall objective of achieving certainty in the group's tax affairs. The relevant stakeholders are consulted before any decision is made in order to confirm it is in line with their own objectives.

5. APPROACH TOWARDS DEALINGS WITH HMRC AND OTHER TAX AUTHORITIES

The firm seeks to comply with its tax filing, tax reporting and tax payment obligations globally. The Group's Vice President of Corporate Tax recognises the importance of developing a strong, collaborative relationship with HMRC, and the Group's Vice President of Corporate Tax will:

- *Proactively manage AssuredPartners Inc.'s (through its UK Subsidiaries) relationship with HMRC with the aim of minimizing the risk of challenge, dispute or damage to its credibility*
- *Participate in any tax authority formal consultation process where it is expected that the matter under consultation will have a material impact on the Group's liability or the Group's tax compliance management*
- *In the event of discovering an error or mistake in a submitted tax return, the Group will provide full and voluntary disclosure to HMRC as soon as practical, including the reason(s) for the error. The Group will then co-operate fully with any follow-up queries, ensure prompt settlement of any outstanding tax liability and put process improvements in place to mitigate the tax risk going forward.*
- *Aim to deal with queries from HMRC on a timely basis and provide full information to explain how the business operate and manages tax risks.*

6. DOCUMENT CONTROL

Responsibility:	The Finance department who have overall responsibility for the operation of the Statement within the business.
Reviewed by:	Stuart Quilter
Position held:	Group Finance Director
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