

Somers Group Holdings Ltd. (“Somers Group” or “the Group”) is a privately held, global specialty property and casualty insurance and reinsurance holding company headquartered in Bermuda, with operations in the UK, Europe and the United States. Bermuda is chosen as its headquarters due to its strong regulatory system, global reputation in reinsurance, and connections to major insurance markets.

The Group’s approach to risk management and governance in relation to UK taxation

The Group operates in a heavily regulated industry and places significant emphasis on reputation and corporate responsibility. The Board of Directors has overall responsibility for the Group’s tax strategy and governance framework. Responsibility for the application and management of tax governance and tax risks is delegated to executive management including the Chief Financial Officer (CFO). The CFO handles day-to-day tax matters, reports to the Board and is supported by the Group’s finance function, senior business leaders and external tax advisors.

The Group’s risk appetite in relation to UK taxation

The Group maintains strict controls to manage risks, including compliance with the UK Senior Accounting Officer (SAO) rules. Processes and systems are in place to:

- i) identify and monitor tax risks within the wider risk framework,
- ii) report such risks to senior management, and
- iii) escalate risks to the relevant Board where appropriate.

Overall, the Group has a low appetite for tax risk and does not engage in tax positions based on interpretations of tax law which are aggressive or subject to significant uncertainty.

The Group’s attitude towards tax planning (so far as affecting UK taxation)

Tax is considered in all significant business decisions and transactions. In doing so, the Group seeks to comply with all relevant tax laws and regulations in order to pay the right amount of tax at the right time. The Group does not engage in artificial or aggressive tax planning or transactions that do not have a genuine commercial purpose and when tax rules are complex or unclear, external experts are consulted. All intra-group transactions are conducted in accordance with the arm’s length principle.

The Group’s approach towards its dealings with HMRC

The Group seeks to maintain open, transparent, and cooperative relationships with tax authorities, including HMRC. This includes a commitment to filing accurate and timely tax returns, paying taxes on time, responding quickly to queries and audits and seeking advance certainty where appropriate.

The Somers Group regards the publication of this tax strategy, as approved by the Group’s Board of Directors, as complying with its duty under Schedule 19 (Paragraph 22) of Finance Act, 2016 to publish its UK tax strategy in the current financial year. This tax strategy applies to all Somers Group entities which are resident in the UK.