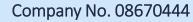


FLOODRE

Tax Strategy

2023





Authorised by the Prudential Regulation Authority and regulated by the Prudential Regulation Authority and the Financial Conduct Authority FRN 706046





Tax Strategy



Background

This document sets out the tax strategy for Flood Re. The strategy has been approved by the Board of Flood Re and is publicly available on our website. The strategy complies with the UK tax strategy publication requirement set out in Part 2 of Schedule 19 Finance Act 2016.

Purpose

The purpose of the tax strategy is to set out Flood Re's approach to managing its tax obligations.

Strategy

The strategy covers the following keys areas:

Tax Compliance

Flood Re is committed to complying with all tax obligations in line with relevant tax law and regulations.

Engagement with UK tax authority

Flood Re acts with honesty and integrity in its dealings with HMRC on a transparent and co-operative basis. The relevant taxes are Corporation Tax, VAT and Employment taxes. This includes making accurate disclosures in correspondence and returns and responding to enquiries in a constructive and timely way.

Tax planning

Flood Re's approach to tax is consistent with the provisions of the Professional Conduct in Relation to Tax (PCRT). The company is committed to applying tax legislation consistently in line with both the intention and spirit of the law. The approach taken is to pay the right tax at the right time. Any tax planning would only be undertaken in the context of the wider business activity.

Flood Re's commercial activities are carried out in a tax efficient manner. We will only claim tax reliefs and incentives where applicable. Flood Re will not undertake transactions that provide no economic benefit other than a tax saving.

We do not participate in tax avoidance schemes.



Tax Strategy - Continued



Management of tax risks

Flood Re's approach to tax is consistent with its appetite to managing its operational risk; adopting as low a risk approach as is commercially sensible. We are committed to paying the appropriate amount of tax and maintaining a good relationship and reputation with other stakeholders including the government and regulatory authorities. External advice would be sought in the rare circumstance where the risk, complexity and size of the decision requires an opinion from a Third Party.

All significant tax issues or developments are reported to the Flood Re Board. Tax risks are identified and monitored and if appropriate included on Flood Re's risk register. Flood Re commits to complying with documented policies and procedures concerning tax risk management.

Governance

Tax is part of the finance function of Flood Re. The Chief Financial Officer has overall responsibility for tax. Day to day matters are carried out by the Senior Financial Accountant with our outsourced tax function, Morrison Govan, and other members of the finance team.

The tax strategy is owned by the Chief Financial Officer and is approved by the Flood Re Board. The strategy is reviewed on an annual basis by the Board.

Signed on behalf of Flood Re

Stuart Logue, Chief Financial Officer

