

Athora Group Tax Policy



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This policy shall be posted to Athora.com (corporate site) and accessible in a reasonable manner to visitors of that site. It will not be included on regional sites and will not be translated.

Athora Tax Policy

Athora Holding Limited and all its subsidiaries (together "Athora"), are committed to tax compliance in all jurisdictions in which it operates. This compliance includes complete and timely tax filings, maintenance of tax records in support of those filings, and transparent interactions with governmental tax authorities. The protection of our policyholders and shareholders is at the core of our strategy and work. Athora continually invests in technical, financial, risk management, and compliance infrastructure and platforms to benefit policyholders, bearing in mind our obligations to all stakeholders. In order to meet Athora's commitments to its stakeholders, business decisions must consider tax from a strategic perspective, while being cognizant of tax obligations and responsibilities. Athora's Group Tax Department should provide value to the organization while remaining dedicated to maintaining high ethical standards and corporate social responsibility.

Governance and Commitment to compliance

Athora currently has operations across several jurisdictions. Operating in various jurisdictions gives rise to a number of tax risks. Athora actively oversees and mitigates these risks and any adverse financial or reputational loss by maintaining highly qualified experts with both the relevant tax experience and qualifications for our global business in its Group Tax Department, considering tax implications in business decisions, and maintaining a strong relationship with tax authorities. All of these strategies are intended to ensure the highest level of compliance with relevant tax obligations.

In structuring Athora's transactions and activities, the company considers the tax implications in the relevant jurisdictions and utilises this information to make the optimal strategic decisions for Athora and its various stakeholders. Any tax planning undertaken will have a commercial and economic purpose and will be mindful of the company's goals and responsibilities regarding tax compliance.

A good relationship with the various tax authorities is a key component in ensuring compliance. By keeping a transparent and open dialogue tax risks can be appropriately mitigated. Athora keeps appropriate and complete documentation relating to its business activities and tax positions at all times. In specific circumstances, Athora may request clarification or tax clearances from a tax authority when the current tax legislation or guidance is unclear or open to interpretation.

Tax Priorities

Athora has a number of tax priorities that are a vital part of maintaining its business and ensuring continued growth. By ensuring these priorities are fulfilled Athora can help minimise the risk of any financial loss to the group and manage its reputational risk.

The company's key priorities are:

- Compliance with international tax standards (such as OECD initiatives).
- Ensuring compliance with reporting and tax filings in each relevant jurisdiction is completed in an efficient, accurate and timely manner.
- Building and maintaining strong tax teams who focus on both local and global tax issues.
- Encouraging an environment which allows the reporting and escalation of any tax issues if necessary and provides appropriate training to personnel.
- Striving to maintain a strong relationship with the relevant tax authority in each jurisdiction.

Implementing efficient tax operation procedures and ensuring appropriate guidance in respect to our tax obligations is available for staff so that tax implications can be considered in business decisions.

Appropriate staff are also trained on these procedures.

Attitude Toward Tax Planning

Tax decisions taken by the company will follow the appropriate tax legislation and guidance where available. In the event that the tax law is open to interpretation, Athora will maintain relevant guidance which supports its views, including the use of expert advice when necessary. Where there is meaningful doubt in respect of interpretation Athora will maintain an open and transparent dialogue with the relevant tax authorities in respect of same.



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