

TM Claims Service Europe Limited Tax Strategy

This Tax Strategy document details the approach taken in relation to ensuring that the UK tax obligations of TM Claims Service Europe Limited (TMCSE) are understood, properly managed and complied with. This Tax Strategy applies to all UK taxes applicable to TMCSE and the document is owned by the Board of Directors of TMCSE.

TMCSE operates its business responsibly, complying with all local laws and regulations that govern its operations, whilst seeking to be fair, honest and transparent in our dealings with all of our stakeholders. Its Tax Strategy is consistent with this approach.

Approach to UK tax risk management

TMCSE has a strong risk reporting and risk governance system in place to ensure effective risk management of all areas of financial, operational and regulatory risk. Management of tax risks is undertaken on a basis consistent with the management of other risks.

The Managing Director is accountable for ensuring that TMCSE has appropriate tax accounting arrangements in place. UK Tax is part of CBW LLP's outsource function with day to day matters undertaken by their outsourcing team who liaise with the UK Tax Teams of other UK based Tokio Marine companies where appropriate. CBW LLP is responsible for the preparation of the annual Corporation Tax Computation and return for TMCSE, though they liaise with the UK Tax Teams of other UK based Tokio Marine companies for group related issues such as group relief.

CBW LLP Tax Team, consisting of tax professionals, liaises with key internal stakeholders, including outsourcing and HR, as well with international colleagues, to identify, assess and control tax risks that arise as a result of TMCSE size, complexity and the nature of its business or transactions. External advice may be sought on specialist or difficult or uncertain matters as necessary.

Controls and procedures are in place to mitigate the risk of inaccurate or late tax returns and tax payments and we are committed to compliance with UK tax law and practice. Changes to, and new, tax legislation or practices relevant to UK tax are monitored with changes made to procedures being implemented when required.

Approach to UK tax planning

TMCSE does not engage in any UK tax planning that solely relates to the avoidance of tax or that involves an aggressive interpretation of tax law. It does consider tax planning involving tax incentives or opportunities intended through UK government policy. Where there are ambiguities, or the technical tax position in relation to our understanding of proposed transactions is not clear, then we will consult with external advisors and/or HMRC, where appropriate, with a view to following the correct treatment under tax law.

Acceptable tax risk

In line with TMCSE wider policy in relation to financial risk management, the level of acceptable UK tax risk is at the cautious end of the spectrum, allowing TMCSE to protect its capital.

This approach means that UK tax positions are not taken where it is deemed that a successful HMRC challenge to such arrangements would be likely.

Relationship with HMRC

TMCSE sees open, constructive and transparent discussions with HMRC as a key and valuable part of managing their tax compliance framework. We, along with CBW LLP, seek to engage with HMRC on an honest basis with real time working when necessary.

TMCSE considers that that publication of this strategy complies with the duty under paragraph 16(2) of Finance Act 2016.

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