

Maiden Global Holdings Ltd: UK tax strategy

Year ended 31 December 2017

This document, approved by the Board, outlines the UK tax strategy of Maiden Global Holdings Ltd (the “Company”) in accordance with the requirements of the Finance Act 2016.

Company background

The principal activity of the Company is to provide insurance consultancy services to subsidiaries, other related party companies and third parties. The business is conducted through a UK tax resident operating company and a German tax resident branch, Maiden Global Holdings Ltd. Niederlassung Deutschland. The Company has direct or indirect subsidiaries located in Australia, Austria, Germany, the Netherlands and Russia.

The Company’s tax planning aims to support the commercial needs of the business by ensuring that tax affairs are carried out in the most tax efficient manner whilst remaining compliant with all relevant laws, regulations and reporting and disclosure requirements. The Company’s tax affairs are managed in a way which takes into account the wider Maiden group’s standards of governance, ethics and risk appetite.

The Company is committed to working cooperatively with key regulatory stakeholders such as the UK Financial Conduct Authority (FCA) and HM Revenue & Customs (HMRC).

The Company appreciates the fundamental importance of ensuring tax compliance and manages its tax obligations commensurately.

Approach to risk management and governance arrangements in relation to taxation

Tax is part of the Finance function of the Maiden Group and is the ultimate responsibility of the Maiden Group’s CFO. In the UK, tax strategy is reviewed at the Company’s Board level. Implementation of the UK tax strategy is the responsibility of the UK Finance Director. Day-to-day tax matters are delegated to the UK Finance team which includes qualified accountants.

External specialist advice is taken when preparing certain annual tax returns including the corporation tax return. Large accounting firms are further engaged to advise on transfer pricing, indirect tax, employment tax and other tax matters requiring specialist knowledge.

Tax risk appetite

The Company seeks to minimise risk wherever possible when conducting its business affairs including tax matters. The Company seeks to identify, evaluate, monitor and manage UK tax risks in order to mitigate them. Where there is significant uncertainty or complexity in relation to a tax risk, external advice is sought.

The Company follows these principles:

- The Company is committed to acting with integrity and transparency in all tax matters.
- The Company will comply with the letter and spirit of UK tax law.
- Timely and accurate tax returns are made that reflect the fiscal obligations to Governments.
- The Company aims for certainty on tax positions and will not make interpretations of tax law that are opposed to its original spirit.
- To support in ensuring that tax law and its spirit is interpreted correctly, advice is sought from large accounting and/or legal firms.

Approach towards dealings with HMRC

The Company is committed to the principles of openness and transparency in its approach to dealing with HMRC, and in particular the Company will:

- make fair, accurate and timely disclosure in correspondence and returns, and respond to queries and information requests in a timely fashion;
- seek to resolve issues with HMRC in a timely manner and, where disagreements arise, work with HMRC to resolve issues by agreement where possible;
- reasonably believe that transactions are structured to give a tax result which is not inconsistent with the economic consequences (unless specific legislation anticipates that result);
- interpret the relevant laws in a reasonable way, and ensure transactions are structured consistently; and
- ensure all interactions with HMRC are conducted in an open, collaborative and professional manner.