

Allianz Capital Partners GmbH / Group – Our UK Tax Strategy

Introduction

This strategy¹ applies to Allianz Capital Partners GmbH London Branch and the related operating entities listed at the end.

The Allianz Group has a global reach operating in more than 70 countries including the UK. Being a tax collector as well as a taxpayer, tax is an integral part of our overall Group business principles and codes.

The Allianz Group acts transparently and responsibly in all tax matters and works closely with experts, auditors and tax authorities, including HMRC, to ensure that we pay our fair share of taxes.

Allianz Tax Strategy and Principles

The Allianz Group tax strategy includes the following key rules and principles:

- Full compliance with tax regulations, accurate and timely reporting and effective tax risk management.
- Safeguarding of the Group's reputation as a responsible taxpayer.
- Existence of a sound organisational set up for appropriate tax management.
- Full compliance of tax planning and optimisation activities with tax laws, supported by solid business reasons to sustain a credible longterm reputation with tax authorities.
- Disclosure of meaningful tax information in a transparent way.
- Continuous improvement and harmonisation of tax processes through simplification and digital solutions

Tax Risk Management and Tax Governance

These principles provide the basis for our Allianz Standard for Tax Management which represents the framework and minimum requirements for all tax relevant processes, methods and structures within the Allianz Group.

All Group entities including those situated in the UK have to adhere to the standard when conducting their tax activities.

¹ The purpose of this statement is to satisfy the UK legislative requirements of paragraph 19(2) Schedule 19 Finance Act 2016 in relation to the publication of tax strategy insofar as it affects our UK Group. This covers the period ending 31 December 2022 and we review and refresh our tax strategy annually.

With this standard, we are committed to a transparent compliance and disclosure policy, seeking to maintain good relationships with tax authorities, acting as a trusted partner, paying accurate amounts of taxes in a timely manner.

In order to achieve consistent and full implementation of our tax strategy, the Group operates local tax functions in its major operations including the UK.

Allianz's appetite for tax risk is low. We therefore seek to minimise tax risks by actively and continuously identifying, assessing, monitoring and managing them.

Tax Compliance and Tax Advocacy

We constantly aim for certainty in our tax positions and obtain internal or external advice and validate our position where appropriate. If we seek rulings from tax authorities to confirm an applicable tax treatment, we do so based on full disclosure of all relevant facts and circumstances.

We seek efficiency in tax matters, including the prevention of double taxation and pay only the tax due following reasonable interpretation and application of tax rules.

We do not engage in aggressive tax planning or artificial structuring that lacks business purpose or economic substance. Our tax activities are conducted with the clear understanding that all facts and circumstances must be disclosed to tax authorities.

This strategy is aligned with our Code of Conduct and is approved, owned and overseen by the Allianz Capital Partners GmbH Board.

Application of the UK tax strategy

In addition to Allianz Capital Partners GmbH London Branch, our UK tax strategy applies to the following entities operating in the UK:

- Allianz Renewable Energy Fund Management 1 Ltd
- Allianz Renewable Energy Partners I LP
- Allianz Renewable Energy Partners II Ltd
- Allianz Renewable Energy Partners III LP
- Allianz Renewable Energy Partners IV Ltd
- Allianz Renewable Energy Partners V Ltd
- Allianz Renewable Energy Partners VI Ltd
- Allianz Renewable Energy Partners VII LP
- Allianz Renewable Energy Partners VIII Ltd
- Allianz Renewable Energy Partners IX Ltd
- Corn Investments Ltd

- RMPA Holdings Ltd
- RMPA Nominees Ltd
- RMPA Services plc
- Allianz Infrastructure Holding I Pte. Ltd
- Allianz Infrastructure Holding II Pte. Ltd