

Allianz Capital Partners GmbH – Tax Strategy

Financial year ended 31 December 2018

Allianz Capital Partners GmbH is a subsidiary of Allianz SE and a member of the Allianz Group (the “Group”). Allianz SE operates in more than 70 countries including the UK. Tax is embedded in almost every aspect of doing business and heavily impacts the key financial data and performance of the Group. The Group’s key objective is to ensure full compliance with the tax regulations of all the countries in which it operates.

While Allianz Capital Partners GmbH retains responsibility and oversight for its own tax affairs, as a subsidiary within the Allianz Group, it operates within the Allianz Group tax governance framework and takes advantage of group tax expertise and resources in managing its tax affairs. Similarly, in line with the wider Group, Allianz Capital Partners GmbH also operates as a responsible tax payer and collector to ensure that the reputation of the Group is protected. This includes accurate and timely reporting, and effective tax risk management.

Allianz Capital Partners GmbH only accepts unavoidable tax risks. Where there is significant uncertainty or complexity in relation to a risk, external advice may be sought.

Any tax planning and optimisation activities undertaken are compliant with tax laws and supported by solid business reasons to sustain a credible long term reputation with tax authorities.

In line with the Group approach, Allianz Capital Partners GmbH engages with tax authorities, including HMRC, with honesty, integrity, respect and fairness and in a spirit of co-operative compliance. Should a disagreement with a ruling or decision of a tax authority ever arise, Allianz Capital Partners GmbH would first seek to resolve any disputed matters in a cooperative manner, through pro-active and transparent discussion and negotiation.

This strategy is approved, owned and overseen by the Allianz Capital Partners GmbH Board and applies to the following entities operating in the UK:

- Allianz Capital Partners GmbH London Branch
- Allianz Private Equity UK Holdings Ltd (dissolved on 9 January 2018)
- Allianz Specialised Investments Ltd (dissolved on 9 January 2018)
- 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 plc
- Allianz Renewable Energy Partners VI Ltd
- Allianz Renewable Energy Partners VII LP
- Allianz Renewable Energy Partners VIII Ltd
- Allianz Renewable Energy Partners IX Ltd (incorporated on 27 July 2018)
- Corn Investments Ltd
- RMPA Holdings Ltd
- RMPA Nominees Ltd
- RMPA Services plc