

NOVEMBER 2023

TAX STRATEGY

We are a specialist UK financial services group focusing on attractive segments of the UK retirement income market. The Group is a leading and established provider of retirement income products and services to individual and corporate clients.

At Just we have a compelling, clear purpose, to help people achieve a better later life by providing competitive products, financial advice, guidance and services to those approaching, at and in-retirement.

Below, we have set out our tax strategy, which summarises how we approach our tax affairs. This tax strategy applies to all Just group companies and to our dealings with our clients. This tax strategy is in accordance with the requirements set out under paragraph 16(2) of Schedule 19 of the Finance Act 2016 to publish the group tax strategy.

Governance

Just is firmly committed to compliance with all relevant tax laws, rules, regulations and reporting and disclosure requirements, in the UK as well as all countries in which we operate. It is of primary importance that we pay the correct amount of tax at the right time, under all relevant laws and regulations.

Overall responsibility for tax governance and tax risk management is with the Group Chief Financial Officer (CFO), the Group Financial Controller (GFC), the Chief Risk Officer (CRO) and the Board.

Operational responsibility for tax compliance, tax risk management and general tax matters (Corporation tax, Value Added Tax, Transaction Taxes and Annuitants PAYE) falls to the Head of Tax and the tax function. Employment tax matters are dealt with by Human Resources with guidance from the tax function as and when required.

Broader tax responsibilities relating to specific tax processes and data requirements may sit within other departments such as Finance, Human Resources, Compliance and Operations. Where this is the case, these responsibilities are documented within a tax risk governance framework and subject to internal audit or external review on a periodic basis.

Tax processes are regularly reviewed and refined, and Just carries out annual Senior Accounting Officer reporting to HMRC.

Approach to tax risk management

We recognise that we are providing an important long-term service to our policyholders and manage our tax affairs in a way that is consistent with this objective. We look to manage tax risk in line with other commercial and operational risks that the group are subject to, by introducing and maintaining appropriate monitoring and management procedures across the organisation, ensuring a consistent approach to risk management across the business. The business does not have a fixed monetary level of acceptable risk but seeks to minimise the risk of operational failure by undertaking the following activities:

- **Monitoring:** The tax function is responsible for identifying relevant changes in the tax regime and ensuring our systems and processes are updated appropriately. The CFO, GFC, CRO and the tax function are involved in significant business changes in order to confirm that all relevant tax matters have been considered.
- **Management:** Just continues to develop structured tax controls which are introduced into business processes in order to reduce tax risk. Operation of these controls is performed by relevant departments and reviewed annually by the tax function as part of the Senior Accounting Officer process.
- **Communication:** The tax function is responsible for communicating tax risk within the organisation. Tax risks are reported monthly to the risk function which is consistent with other operational risk matters. Significant tax risks are highlighted to the Board and senior management for consideration.

Attitude to tax planning

Our approach to tax planning focusses on the effective management of the group's tax position in line with the broader commercial objectives to put customers first and deliver long-term economic value to our shareholders.

We will only utilise legitimate tax reliefs for the purposes for which they were intended by Parliament. The UK tax authorities and other tax regimes often include tax credits or exemptions for commercial business activity. Where relevant, we will seek to claim these incentives if they are consistent with the commercial objectives of the business and do not create significant risk. Where there is uncertainty we may engage with tax advisors and/or the tax authorities in order to confirm the right tax treatment.

Relationship with tax authorities

We are committed to the principles of openness and transparency in our dealings with HMRC and all tax authorities in a collaborative, courteous and timely manner.

Where there is uncertainty on a tax matter, we will typically seek independent advice and work with HMRC (or other tax authorities) to achieve resolution in an open and constructive manner.