



Tax Strategy for the United Kingdom

Scope

This UK tax strategy sets out Miller's approach and strategy for handling its tax affairs and managing the tax risks of its UK Group for the year ending 31 December 2022. This UK tax strategy is intended to comply with paragraphs 19 and 25 of schedule 19 of the Finance Act 2016. It applies to all UK entities and all UK taxes.

Introduction

Miller is one of the leading specialist insurance and reinsurance brokers operating through Lloyds, the London and international markets.

One of our core values at Miller is to do the right thing, whether this is acting with integrity, making principled decisions, or giving clients clear, honest and unbiased advice. Therefore, we have aligned our UK tax strategy to support this value, our governance framework, our tax risk management, our approach to tax planning, our tax risk appetite, and our relationship with HM Revenue & Customs (HMRC).

Governance in relation to UK taxation and Risk Management

We have processes and controls that support our governance framework, which are compliant with HMRC requirements. Day-to-day management and implementation of the tax strategy is delegated to the Head of Tax & Treasury who directly reports to the Chief Finance Officer. Miller operates a three lines of defence model with first line management responsible for managing and maintaining their risks and controls. A quarterly risk and controls self-assessment is provided to the Risk Team for escalation to the quarterly Risk Committee, a sub-committee of the Miller Board. This includes updates on risks, controls, and risk appetite. Where a risk or control has been considered to be performing outside of appetite, more substantive updates are provided which includes detail of remediation activity for returning to within tolerance.

Tax Planning

Tax planning is part of the overall business decision-making process and does not implement or utilise any tax avoidance strategies. All transactions have an underlying commercial substance, and any related tax planning upholds the letter and spirit of the law. In situations where the tax law is unclear or uncertain, we seek advice from external advisors.

Tax Risk Appetite

Miller has a low appetite for tax risk; and specifically has a zero tolerance for tax evasion or the facilitation of tax evasion by Miller or anyone associated with Miller.

Miller seeks to ensure that financial and other reporting is accurate, useful and timely. This includes reporting to taxation authorities. Miller also seeks to eliminate regulatory breaches and any activity that may result in withdrawal of regulatory licences; or material/public sanction by regulatory or tax authority.

Miller's risk appetite is approved by the Board and monitored by the Risk Team through a set of formal key risk indicators, with early warning thresholds in place to identify changes to risk exposure. Any breach of risk appetite or the early warning indicators is escalated to the Risk Committee and Board with details of remediation activity where necessary.

Our relationship with HMRC

Miller seeks to have a transparent and constructive relationship with HMRC in relation to current, future, and past tax risks.

We are committed to being compliant with all tax reporting obligations and ensuring our UK tax computations and returns contain full disclosure of any facts relevant to determine the tax treatment of specific transactions. We seek to ensure we pay the correct amount of tax and payments are made on time.