



THIRD POINT RE

UK Tax Strategy 2018

Third Point Re UK - Tax Strategy Statement

The relevant UK subsidiaries of the Third Point Reinsurance Ltd. (“TPRE”) Group, being those companies listed in the Appendix and collectively referred to as the “Third Point Re UK Entities”, have developed and adopted this document, in compliance with their duties under Paragraph 16(2), Schedule 19, Finance Act 2016 to publish a UK tax strategy.

Our approach to risk management and governance arrangements in relation to UK taxation

Risk management is integral to the Third Point Re UK Entities’ business strategy and the achievement of their commercial objectives, with risks assessed and mitigated in accordance with the Enterprise Risk Management Framework (“Framework”) of the TPRE Group. Risks associated with taxation are regarded within the Framework as operational risks. An operational risk is the risk of loss arising from inadequate or failed internal processes, people, systems or from external events, impacting an entity’s ability to operate. Our approach to managing taxation risk is to ensure changes to tax requirements are monitored as far in advance of their introduction as practicable to ensure the Third Point Re UK Entities can plan for and manage the consequences of any changes.

Controls have been put in place to mitigate taxation risks. These controls are proportionate to the potential severity of each risk’s impact on key stakeholders and the likelihood of occurrence, including quarterly tax meetings held by the Chief Financial Officer (“CFO”) of the TPRE Group where the evaluation of tax compliance and other tax issues are evaluated with the assistance of external tax advisors. These quarterly tax meetings encompass the tax activities of the Third Point Re UK entities. Both the design and operational effectiveness of those controls are routinely monitored and tested by Finance within the TPRE Group, with additional oversight from our external auditors.

The CFO of the TPRE Group, working closely with external tax advisors, has overall responsibility for each Third Point Re UK Entity’s tax affairs, and provides updates to each entity’s Board on tax matters where relevant.

Our attitude towards tax planning and the level of risk in relation to taxation that we are prepared to accept

The Third Point Re UK Entities each have a low tolerance for taxation risk. They comply with the requirements of the tax laws in all jurisdictions in which they operate and approach the management of their tax affairs in a reasonable and responsible way. The Third Point Re UK Entities do not engage in aggressive tax planning nor do they enter into non-commercial transactions where the main purpose or one of their main purposes is to avoid tax. Our primary motivation is to maintain tax compliance of our Third Point Re UK Entities and transparency with the HMRC.

The Third Point Re UK Entities recognize that tax law can be complex in its application and therefore rely on the finance team of the TPRE Group which comprises highly trained and experienced personnel to support their business. They often seek external tax advice to assist in interpreting new legislation or provide advice a proposed transaction, in order to reduce the associated taxation risk.

Working with HMRC in the UK

The Third Point Re UK Entities conduct their tax affairs in a courteous, open and transparent manner with all relevant tax authorities and adopt a constructive approach to resolving outstanding tax matters. If issues arise, they would schedule meetings with HMRC to discuss any tax issues in relation to the UK at an early stage. In addition, they ensure that all tax returns, reports and required disclosures are made in a timely fashion.

Appendix: Third Point Re UK Entities

Third Point Re (UK) Holdings Ltd.

Third Point Re Marketing (UK) Limited