



UK Tax Strategy, for the year ending December 31, 2022

Introduction

The following information is provided in compliance with the requirements of Schedule 19, paragraph 16(2) of Finance Act 2016.

The headings below follow the scheme of the legislation and related guidance that has been published by Her Majesty's Revenue and Customs ("HMRC").

About The Travelers Companies, Inc.

The Travelers Companies, Inc. is a United States SEC-listed public company that is headquartered in the United States and has insurance operations in Canada, the United Kingdom, the Republic of Ireland and throughout other parts of the world as a corporate member of Lloyd's, as well as in Brazil and Colombia, primarily through joint ventures.

The Travelers Companies, Inc. is the ultimate parent company of the UK companies¹ to which this UK tax strategy applies.

It is the policy of the UK Group Companies to comply with all applicable laws, rules and regulations. Further, it is the personal responsibility of each employee, officer and director to adhere to the applicable requirements imposed by laws, rules and regulations. This responsibility is contained in the Code of Business Conduct and Ethics set forth by The Travelers Companies, Inc. and applies to every employee, wherever located.

UK Tax Strategy

The tax strategy of the UK Group Companies addresses four key objectives:

- i. Compliance with the applicable laws, rules and regulations;
- ii. Managing their tax liabilities in accordance with applicable laws, rules and regulations;
- iii. Mitigating their tax risk through internal systems, processes and controls, with the use of internal and external specialist knowledge and skills, as appropriate; and
- iv. Appropriate interaction with HMRC.

¹ The companies to which the UK tax strategy applies are: Travelers Corporate Trustee Limited, Travelers London Limited, Aprilgrange Limited, F&G UK Underwriters Limited, Travelers Underwriting Agency Limited, Travelers Management Limited, Travelers Syndicate Management Limited, Travelers Insurance Company Limited, Camperdown Corporation, Travelers Insurance Designated Activity Company UK branch, The Travelers Indemnity Company - UK PE and Travelers Special Services Limited (collectively, the "Travelers UK Companies"), and Xbridge Limited. The Travelers UK Companies and Xbridge Limited are collectively referred to as the "UK Group Companies" and individually referred to as a "UK Group Company".

The UK tax strategy relates to all taxes that the UK Group Companies bear, as well as the taxes that it collects on behalf of the UK government, including employment taxes, value added taxes and excise taxes. It addresses the following key objectives:

i. Compliance with laws

- a. The tax return filings of the UK Group Companies are prepared in a timely manner and the determination of taxes due is in accordance with all applicable laws, rules and regulations.

ii. Managing tax liabilities

- a. The UK Group Companies look to applicable laws, rules and regulations to establish their tax liabilities.
- b. Each UK Group Company evaluates the use of tax incentives provided under applicable laws, rules and regulations to manage its tax liabilities in a tax-efficient manner.
- c. The UK Group Companies take a multi-disciplinary approach to tax planning, involving, as appropriate, tax, finance, accounting, legal and regulatory personnel, as well as external legal, tax and accounting advisors from time to time. The UK Group Companies do not engage in transactions where the sole purpose is tax avoidance.

iii. Mitigating tax risk

- a. Tax risk is managed in a manner consistent with the management of other risks by the UK Group Companies. The UK Group Companies have a low tolerance for tax risk and, where applicable, have been granted a low risk status by HMRC. The risk management framework implemented by the UK Group Companies requires a risk owner to establish processes for identifying, measuring, controlling and reporting on the tax risk. The Travelers UK Companies' Chief Financial Officer and Xbridge Limited Chief Financial Officer are the risk owners of the Travelers UK Companies and Xbridge Limited, respectively. Travelers UK Companies' Chief Financial Officer and Xbridge Limited Chief Financial Officer report on tax risks to the Travelers UK Companies' governance committee and Xbridge Limited governance committee, respectively.
- b. The Travelers Companies, Inc. employs tax professionals in the US who work closely with local finance professionals of the UK Group Companies. The UK Group Companies and The Travelers Companies, Inc. invest in the continuing education and development of their tax and finance professionals to keep abreast of applicable laws, rules and regulations.
- c. As appropriate, outside legal, tax and accounting advisors are engaged to supplement internal tax and finance functions.
- d. The UK tax strategy is owned, and reviewed at least annually, by the Boards of the Travelers UK Companies with respect to the Travelers UK Companies, and, separately, the Board of Xbridge Limited with respect to Xbridge Limited. The responsibility for day-to-day implementation of the UK tax strategy rests with the Chief Financial Officer of the Travelers UK Companies, with respect to the Travelers UK Companies, and the Chief Financial Officer of Xbridge Limited, with respect to Xbridge Limited.

- e. The Boards of the Travelers UK Group Companies and Xbridge Limited receive reports, at least annually, from their respective Chief Financial Officers on UK tax matters. These reports cover, among other matters, significant UK tax risks, if any, updates of any UK tax planning that might have been undertaken, changes to the effective tax rate of the UK companies, any communication with HMRC or non-UK tax authorities and any impending changes in UK tax policy or legislation that might affect the UK companies in a material way.

iv. *Interaction with tax authorities*

- a. Each UK Group Company takes tax enquiries seriously and endeavors to address those with HMRC in a timely manner.
- b. The UK Group Companies aim to comply with applicable laws, rules and regulations in their dealings with HRMC, whether in tax returns or other communication.
- c. The UK Group Companies may seek advance tax clearance from HMRC when deemed appropriate by the relevant Chief Financial Officer.

In summary, the UK Group Companies are committed to:

- i. Complying with UK tax laws, rules and regulations,
- ii. Paying the amount of tax in UK determined in accordance with applicable laws, rules and regulations,
- iii. Mitigating its tax risk through appropriate personnel, systems, processes and controls, and
- iv. Cooperating with HMRC in accordance with applicable laws, rules and regulations.