

Allstate Global Holdings Limited

Tax Strategy

This policy has been published in compliance with paragraph 16(2) of Schedule 19 to the Finance Act 2016 and is in relation to the accounting period ended December 31, 2021. It will remain in force until it is next updated.

1. Introduction

The Allstate Global Holdings Group (“AGHL”) is a UK Sub-Group of The Allstate Corporation. The companies in this group are all registered in Northern Ireland and the primary trading companies are Allstate Northern Ireland Limited and Arity International Limited.

At Allstate Global Holdings, our approach to tax is essential to ensuring tax compliance with all applicable laws and in fulfilling our fiduciary responsibility to the Allstate Corporation. We aim to achieve sustainable participation in local communities for the long term as a business and as a global corporate citizen.

2. Tax in our UK Statutory Accounts

The financial statements of Allstate Global Holdings companies are prepared in accordance with United Kingdom Generally Accepted Accounting Principles. The financial statements are audited by a professional accounting firm and filed publicly in the UK.

Our business activities incur a variety of taxes, which are primarily corporate taxes and employment taxes. In addition, we collect and pay employee taxes and indirect taxes such as value added tax. The taxes we pay and collect represent a significant part of our economic contribution to the economy in which we operate.

There are various reasons why the corporate tax cash payments in a particular year may be different from the corporate tax expense in the financial statements, including timing differences and deferred taxes.

We provide information on taxes in our annual statutory accounts which are filed with UK Companies Registry. The tax disclosures in our statutory accounts summarize in aggregate the significant components of corporate income tax expense for the periods presented.

3. Tax Responsibilities and Organization

The Senior Vice President of Tax for The Allstate Corporation is responsible for managing the Company's Tax function globally and leads a senior team with specific geographic and technical responsibilities. UK finance personnel manage the routine tax processes relevant to their jurisdiction and collaborate with Corporate Tax as required.

In addition to working closely with the Corporate Tax department, AGHL group companies utilise professional tax experts routinely to give advice on tax matters and to prepare tax computations. We seek advice from external advisors on material transactions and whenever the necessary expertise is not available in-house.

The Board of Directors of each legal entity in the Group have overall responsibility for the financial reporting which includes tax, and updates on any significant tax matters are reported to the Board as required.

4. Tax Governance and Risk Management

The Allstate Code of Business Conduct addresses our responsibilities to the Company and its investors, customers, suppliers, consumers, and governments and defines how employees should conduct themselves as representatives and ambassadors of the Company. All employees are expected to understand the Code of Business Conduct and are expected to comply with the Code in addition to all applicable government laws, rules and regulations. Our approach to taxation is grounded in these values, which are reflected in our Code of Business Conduct.

The Allstate Global Holdings group maintains robust internal policies and procedures to support its tax control framework and manage risk. The governance structure in place ensures that tax decisions are taken at the appropriate level and ensures that there is alignment across our business. Each company in the group has specific Board of Directors and management approval requirements and approval process for both material, and non-material, commitments made on behalf of the relevant company. These processes include the Corporate Tax department being involved in changes in corporate structure, all business acquisitions and divestitures and business transactions.

5. Tax Planning and Level of Risk

Allstate Global Holdings group complies with applicable tax rules and regulations, including relevant transfer pricing guidelines. In the event that a company in the Group undertakes transactions, the Corporate Tax department advises the business on the tax consequences so that the business may structure its affairs in the manner that supports the business' commercial and economic activity. AGHL does not engage in artificial tax arrangements and seeks to minimize the risk of uncertainty or disputes. If a significant transaction occurs that may give rise to different interpretations, we tend to proactively seek advice from expert advisors in order to determine the best interpretation.

We adhere to the arm's length standard and apply it to ensure the parties to intercompany transactions are appropriately remunerated, as if they were unrelated parties.

6. Relationship with Taxing Authorities

Allstate Global Holdings seeks to develop open and mutually respectful relationships with government and fiscal authorities based on transparency and trust. We work collaboratively wherever, and whenever, possible with fiscal authorities to resolve disputes and to achieve early agreement.

In the UK, Allstate Global Holdings adopts an open, professional and transparent relationship with Her Majesty's Revenue and Customs ("HMRC"). We engage in open dialogue in relation to compliance and risk and are committed to making full and accurate disclosures in tax returns and in correspondence with HMRC. We seek to co-operate with HMRC at all times and to deal with issues in a timely and collaborative manner. Should genuine differences of opinion occur, we will always seek to resolve such an issue with reference to the relevant legislation and tax law.

This policy applies to the three companies in the AGHL group, being Allstate Global Holdings Limited, Allstate Northern Ireland Limited and Arity International Limited.