

InfraRed Holdco Group

- UK Tax Strategy

This UK tax strategy is published in accordance with the requirements set out in Schedule 19 of Finance Act 2016. The strategy, which has been approved by the Board of Directors of InfraRed (UK) Holdco 2020 Ltd, is effective for the period ending 31 December 2022. It applies to InfraRed (UK) Holdco 2020 Ltd and its dormant subsidiary Sun Life (UK) Designated Member Ltd, referred to as the "InfraRed Holdco Group".

InfraRed Holdco Group

InfraRed (UK) Holdco 2020 Ltd is the UK holding company of InfraRed Partners LLP and a subsidiary of Sun Life (U.S.) Holdco 2020 Inc, which has its headquarters in the US. The company was incorporated to purchase InfraRed Partners LLP and acts solely as a passive holding company.

The Tax Strategy for the InfraRed Holdco Group sets out our approach to the management of InfraRed Holdco Group UK tax affairs in supporting business activities in the UK.

We aim for our tax affairs to be well governed and transparent, meeting all legal requirements and mitigating tax uncertainties. We have an open, transparent, co-operative and constructive relationship with HM Revenue and Customs ("HMRC").

We review our Tax Strategy every year and it is approved by the Board of InfraRed (UK) Holdco 2020 Ltd.

InfraRed Holdco Group's approach to effective tax risk management and governance

InfraRed Holdco Group uses the Sun Life UK Tax Team to assist with the preparation and submission of Corporation Tax returns and computations. We rely upon them as advisers to make us aware of relevant new or updated tax legislation to reduce the risk of any non-compliance. Compliance with regulatory, legal and ethical standards is a high priority for the InfraRed Holdco Group.

InfraRed Holdco Group's attitude towards tax planning

We make management decisions after careful consideration of all the key metrics, including the regulatory, legal, accounting and tax implications. Where we identify tax issues from a proposed management action, we analyse and understand them to ensure that there are no unintended tax costs. Whilst the management of the InfraRed Holdco Group's UK tax affairs contributes to achieving business objectives, we base all management actions on an underlying business purpose with commercial and economic substance. We do not engage in tax planning which is considered abusive or enter into transactions or arrangements where the main purpose is the avoidance of tax.

Where there is uncertainty about how a transaction is taxed, we will discuss it with HMRC and take external advice where appropriate. We may also use external advisors to provide specialist expertise or to help us to understand new tax legislation or industry practice.

InfraRed Holdco Group's assessment of acceptable tax risk

We have low tolerance for the risk of tax return errors or omissions, or late submissions or tax payments as part of our tax compliance obligations. We also have low tolerance for losses suffered as a result of failing to develop, implement and monitor controls to manage our tax risks.

InfraRed Holdco Group's approach to dealings with HMRC

We seek to maintain an open, transparent, co-operative and constructive relationship with HMRC, engaging with honesty, integrity and fairness. In certain situations, we may engage with HMRC on a real time basis to agree or understand the operation of tax legislation. We aim to discuss any significant issues before filing tax returns so that we are able to conclude any tax issues in a timely manner.

December 2022