



UK Tax Strategy Aurelius Group 2018

AURELIUS Group is an international multi-asset manager investing in a wide range of sectors. The head of the group AURELIUS Equity Opportunities SE & Co KGaA is resident in Germany and publicly traded in the m:access segment of the Munich Stock Exchange. Aurelius has presently investments in more than 40 countries, inter alia in the United Kingdom.

Aurelius Group is committed to comply with tax filing, reporting and payment obligations wherever we operate and to foster constructive and transparent relationships with the tax authorities.

Given the structure of the Aurelius Group the oversight of the subgroups' tax affairs, the day-to-day responsibility for the tax strategy, the supporting governance framework, the management of tax risks and the handling of the respective tax filing, reporting and payment obligations at the level of the single companies is assigned to the local companies' management. The local management shall also inform the Chief Financial Officer (CFO) and/or the tax and legal team of AURELIUS Equity Opportunities SE & Co KGaA about any material adverse tax events which arise at the local companies' level. The monitoring of the overall Group tax aspects (such as country by country reporting, senior accounting officer rules, group tax reliefs, corporate interest restrictions rules and further Group tax responsibilities) is assigned to the CFO of AURELIUS Equity Opportunities SE & Co KGaA and the Group Tax Director, whose responsibility is also to inform the Board of AURELIUS Equity Opportunities SE & Co KGaA about key tax events at the Group level. This allows Board members to be adequately engaged in the tax affairs at the overall Group level and thereby ensure Aurelius Group is adhering to its responsibilities.

There are five key principles to which Aurelius Group adheres when considering all aspects of taxation:

Appropriately qualified team: At the level of the local companies the responsibility for the tax affairs sits with appropriately qualified and experienced teams, consisting of finance and/or tax professionals. At the level of AURELIUS Equity Opportunities SE & Co KGaA the overall Group tax affairs are managed by an experienced Group Tax Team consisting of the Group Tax Director and 5 Tax Managers who are supported by local tax advisers. The Board of AURELIUS Equity Opportunities SE & Co KGaA will continue to review the structure of the Group Tax Team at suitable intervals to ensure it remains appropriate to the business environment and external tax environment.

External advisers: To assist the local management and the Group Tax Team of AURELIUS Equity Opportunities SE & Co KGaA, external advisers are engaged to provide technical expertise when necessary.

Attitude to tax planning: Aurelius Group has a strong commercial focus and, as part of its duty to its stakeholders to mitigate unnecessary costs, utilizes tax reliefs and allowances available in the manner intended by the tax authorities and statute. Any tax planning undertaken has commercial and economic substance and reasons and Aurelius Group does not engage in any artificial tax arrangements.

Risk Management and Governance: Given the scale and nature of our business we are aware that risks associated with compliance and reporting failures as well as risks associated with undertaking of transactions and reorganisations within the Group may arise. In cooperation with the external tax advisors the local management as well as management of Aurelius Group proactively seek to identify, manage and monitor the tax risks. The oversights of the risk areas are supported – in accordance with the respective responsibility – by the local tax teams (where available), local management, Aurelius Group Tax Team, Group Internal Audit and external tax advisers.

Transparency with HMRC: The local UK companies seek to have an open and transparent relationship with HMRC and will disclose all relevant facts and circumstances to the HMRC and seek to resolve any disputed matters through pro-active and transparent discussion.