



Stewart Title Limited Tax Strategy

Introduction

In accordance with paragraph 16(2) of Schedule 19 of the Finance Act 2016, Stewart Title Limited presents the firm's UK Tax Strategy for Stewart Title Limited and its subsidiaries ("The Group") for the year ended 31 December 2022. This tax strategy applies to all UK taxes applicable to the Group and has been approved by the Board of Directors of Stewart Title Limited ("the Board").

The policy is reviewed annually.

Approach to UK tax Risks

The Group has a low appetite towards tax risk and as such all significant tax decisions are considered by the senior management team and agreed with the Board. Expert tax Counsel is sought on a case-by-case basis where appropriate.

The Group's policies and protocols are drafted to ensure that its filings are done on a timely and accurate basis. The Group will engage tax experts to prepare its returns to ensure current tax rules are applied. Annual tax filings and tax positions are subject to review by the Group's independent external auditors.

Attitude towards Tax Planning

As a title insurer in the UK market, the Group considers it a requisite part of its corporate citizenship to pay its calculated tax. As such the Group does not engage in tax schemes which are speculative. While the Group is protective of its proprietary data, it willingly discloses data, including tax data, where required and/or recommended by HMRC. Additionally, the UK arm of the Group reports as required under the Organisation for Economic Co-operation and Development guidelines for compliance with Base Erosion and Profit Shifting (BEPS) requirements.

The level of risk in relation to UK taxation

The Group seeks to comply fully with its regulatory obligations and ensures its tax arrangements are consistent with a low tax risk approach to conducting its business.

The Group does not seek to structure transactions in ways that give tax results inconsistent with the transaction's underlying economic consequences.

Where the tax treatment of any particularly material transaction is uncertain, external tax advice will be sought before proceeding with the transaction.

Working with HMRC

Whenever a UK tax matter is presented to the Group, it will speak with its tax experts to understand the issue and how best to present the matter to HMRC. It is important that the Group does sufficient work and/or research beforehand so that HMRC receives from the Group the necessary facts to consider the matter in full.