Sompo UK and European Group Tax Strategy

This document sets out the approach to tax taken by the UK and European subsidiaries and branches of subsidiaries of Sompo International Holdings Ltd. (the "UK and European Group") on and after 28 February 2026. As this is after the acquisition of Aspen International Holdings Ltd and its subsidiaries (the "Aspen group") this strategy also encompasses the UK and European entities of the Aspen group.

The publication of this tax strategy statement is regarded as satisfying the UK statutory obligation under Para 16(2), Schedule 19, Finance Act 2016.

An additional objective of this statement is to document our compliance with applicable ESG requirements for underwriting activities, reporting on the Taxonomy KPIs and related minimum safeguards which also include taxation.

Our approach to UK and European tax risk management

For all actions, the UK and European Group is committed to:

- Adhering to the highest standards of ethics and integrity; and
- Being consistently honest, candid, and forthright in our relationships with tax authorities (being HMRC in the UK, all relevant tax authorities in Luxembourg and other European tax authorities where we have filing obligations).

We seek to ensure that the UK and European Group's approach to all UK and European tax compliance matters is aligned with these company principles. We seek to act responsibly and with integrity at all times. We are committed to fully complying with all tax laws, rules and regulations which apply to us.

Governance

We believe that tax risk should be prudently managed and controlled. We operate within an effective tax control framework focusing on risk identification, control activities and effective channels of communication. We monitor the impact of relevant tax law and regulation developments and internal business initiatives on our tax compliance and reporting obligations.

The Global Head of Tax is responsible for identifying, managing and monitoring tax risks arising within all our businesses and for global oversight of corporate tax planning, compliance and reporting. This is undertaken in the UK and Europe primarily through the activities of the Head of Tax – Europe & Asia and their International Tax Team. All significant tax risks and developments are raised to UK and European

executive management and UK and European boards of directors, as well as the parent company Chief Financial Officer, General Counsel, other members of executive management and/or the board of directors, as appropriate.

UK and European tax reporting and compliance is also periodically reviewed by our Internal Audit department in connection with our internal compliance procedures and our UK Senior Accounting Officer procedures.

Attitude Towards Tax Planning

In structuring the UK and European Group's commercial activities, we will consider, among other factors, the tax laws of the countries within which the UK and European Group operates with a view to maximizing value on a sustainable basis for the UK and European Group's stakeholders. We will not engage in aggressive tax planning transactions, and we will not enter into transactions which lack a commercial business purpose or are predicated upon unreasonable assumptions. Any transactions between a member of the UK and European Group and an affiliate will be conducted on an arm's length basis.

Level of Tax Risk Accepted

Given the scale of our business and the volume of tax obligations, risks will inevitably arise from time to time in relation to the interpretation of tax laws and the nature of our compliance arrangements. The UK and European Group proactively seeks to identify, evaluate, manage and monitor these risks to ensure they remain in line with the UK and European Group's risk appetite. Where the tax law is unclear or subject to interpretation, we engage external tax consultants for tax compliance and advisory assistance as an additional safeguard to ensure tax compliance and reduce tax risks.

Our approach towards working with UK and European tax authorities

We recognise that the tax authorities in the various jurisdictions in which we do business play an important role. We seek to maintain an open, transparent and constructive relationship with the local tax authorities in which the UK and European Group is considered to have a tax presence or tax reporting obligations. We respond to all tax authority queries in a transparent, complete and timely manner and proactively engage with them on any changes to our business that will impact our tax filings. If we identify errors in our filings we will work with tax authorities to resolve these issues as they arise.

We believe that a mutually open and transparent relationship with all applicable tax authorities is essential for creating long-term shareholder value.