

Columbia Threadneedle Investments tax strategy

At Columbia Threadneedle Investments we aim to deliver positive outcomes that meet the needs of our stakeholders and we commit to always act responsibly, transparently and in the best interests of those who trust us to manage their investments. Consistent with this approach, it is important that our tax affairs are managed in a responsible, sustainable manner that is in keeping with our values.

Further, as a major investor in global companies and a responsible steward of our clients' assets, we hold a well-established belief in the importance of prudent tax management, as a key part of the responsible management of a company's affairs. We expect the companies in which we invest to demonstrate a responsible approach to and policy on tax, and we apply the same rigour and principles to our own tax management.

This 2019 tax strategy provides an overview of Columbia Threadneedle Investments' UK tax strategy and approach.

The UK Columbia Threadneedle Investments group of companies, which is ultimately owned by Ameriprise Financial Inc, a US listed company, and the investment funds it manages (the "Group"), pay tax and collect tax from employees and customers. The principles outlined below govern the Group's management of its tax affairs, approach to tax planning and tax risk appetite. Compliance with these Principles falls within the Group's governance and risk management processes.

This UK tax strategy of Columbia Threadneedle Investments has been published in line with Paragraph 19(2), Schedule 19 of Finance Act 2016 for the year ended 31 December 2019.

Columbia Threadneedle Investments UK tax risk management and governance

The Board of Threadneedle Asset Management Holdings Limited ("TAMHL") is ultimately accountable for this UK tax strategy and Principles. Tax risks are considered within the Group's governance and approval framework including the Risk and Controls Committee on an ongoing basis and escalated to the Board for consideration where appropriate.

The Group employs a UK tax team made up of a number of professionals who report to the EMEA Head of Finance and manage and oversee all the ongoing tax obligations of the UK Group in liaison with Ameriprise Financial's tax team who report to the Ameriprise Financial Inc. Chief Financial Officer, and professional services firms. As part of the overarching risk management framework, the UK tax team works closely with the business and is informed and consulted on business changes, in order to proactively identify tax risks and to ensure that the level of risk is well understood and within acceptable parameters.

Columbia Threadneedle Investments UK Tax Principles: approach to tax planning and tax risk appetite

Columbia Threadneedle Investments is committed to:

- Compliance with applicable tax laws, rules, and regulations globally.
- Paying in full and on time the right amount of tax based on the tax laws and rules of the jurisdictions in which it is required to do so.
- Interpreting tax laws using appropriate guidance and advice, including discussion with tax authorities where appropriate, and applying diligent professional care and judgement.
- Seeking professional advice where required and working closely with tax authorities where appropriate.
- Managing its tax affairs so as to enhance stakeholder value, whilst ensuring that the reputation of the business is not compromised.
- Aligning tax strategy with business and commercial rationale and evaluating tax planning opportunities in this context, within clear risk measures.
- Managing tax risk to ensure that key risks are identified, and material risks minimised as part of the Group's Risk Committee policy and procedures.
- Proactively managing and monitoring compliance with the above tax principles.

Columbia Threadneedle Investments' approach to dealing with HMRC and other tax authorities

These Tax Principles also extend to **Columbia Threadneedle Investments'** relationships with all tax authorities:

- It seeks to maintain constructive, transparent and collaborative working relationships with tax authorities based on mutual trust.
- Where issues are identified, they are immediately rectified including full disclosure as appropriate.