

*Tax Policy and
Transparency
Report 2020*

1. Introduction

Swiss Life is a leading European provider of life and pensions and financial solutions. Swiss Life enables people to lead a self-determined life and has more than 160 years of experience in helping private and corporate clients prepare their financial future. The Swiss Life Group operates in Switzerland, France and Germany and has competency centres in Luxembourg, Liechtenstein and Singapore. Swiss Life Select, Tecis, Horbach, Proventus, Fincentrum, and Chase de Vere advisors choose suitable products for customers from the market according to the Best Select approach. Swiss Life Asset Managers offers institutional and private investors access to investment and asset management solutions. Moreover, Swiss Life provides multinational corporations with employee benefits solutions and high net worth individuals with structured life and pensions products. The subsidiaries Livit, Corpus Sireo, Beos, Mayfair Capital and Fontavis are also part of the Swiss Life Group. The Group employs a workforce of around 9800 and has at its disposal a distribution network of some 15800 advisors.

2. Tax Policy

2.1 Commitment to compliance

Swiss Life takes its corporate responsibilities seriously, whether in its business operations, its role as an employer and its responsibility to society and environment. Swiss Life is a member of several sustainability initiatives as outlined in its Sustainability Report. As a taxpayer, Swiss Life aims to bear its fair share of the public budget, contributes to the economy, and offers jobs and training opportunities. Tax compliance for us means paying the appropriate amount of tax in the right place on a timely basis. It involves disclosing relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where available.

2.2 Tax governance and risk management

Swiss Life complies with accepted standards of corporate governance and, in the interests of its shareholders, policyholders and staff, attaches great importance to the requirements entailed in terms of the management and organisation of the Swiss Life Group. The corporate governance of Swiss Life Holding Ltd (Swiss Life Holding) is based on the relevant directives issued by the SIX Swiss Exchange and the Swiss Financial Market Supervisory Authority FINMA. It is modelled on leading national and international corporate governance standards; in particular, the Swiss Code of Best Practice for Corporate Governance issued by the Swiss Business Federation “economiesuisse”, as well as the Organization for Economic Cooperation and Development’s (OECD) principles on corporate governance.

One pillar of Swiss Life’s responsible, sustainable business is its integrated, value-oriented risk management involving both quantitative and qualitative elements. The goal is to protect customers’ funds and ensure the best possible investment of risk capital, while complying with legal and regulatory requirements and considering the current capital market environment.

Risk management is a key component of Swiss Life’s management process. The respective committees of the Corporate Executive Board and the Board of Directors continually monitor and take decisions in the area of risk management.

Swiss Life sets great store by compliance with all applicable legal provisions and regulatory stipulations in all its activities. Its Code of Conduct is an important tool in this respect. It

contains the values and principles of Swiss Life as well as the rules of conduct, which are binding for all employees. It stipulates that all employees of Swiss Life must comply fully with all applicable laws and regulations, all relevant internal directives, and guidelines.

The management of the Group's tax affairs is based on Directives and Guidelines that are approved by the Corporate Executive Board.

Under the leadership of the General Counsel, the Head of Corporate Tax supports the Board of Directors and the Group Executive Board in all tax matters pertaining to the Swiss Life Group. The General Counsel and the Head of Corporate Tax jointly have overall functional responsibility, overseeing and coordinating the activities of the local Tax Services Functions.

The Division CFO and Tax Services Functions of the Divisions are responsible at their level for day-to-day tax questions and compliance with the overall tax policy of the Group. The Division CFO and Tax Service Functions of the Divisions report functionally to the Head of Corporate Tax. In certain tax questions, it remains at the discretion of the Group Tax Services Function to take over responsibilities from the local Tax Services Functions.

2.3 Attitude towards tax planning

Tax is one of a range of topics that the Swiss Life Group will consider when deciding how to organize its commercial activities to create sustainable value for its stakeholders. All tax planning must support genuine commercial activity and comply fully with all applicable tax laws and regulations as well as reflecting legislative intent. The Group will not enter into transactions that are purely tax driven or that result in an artificial or contrived outcome. Where the interpretation or application of tax laws is not clear, we take well-reasoned approaches based on available legal authorities and administrative positions of tax authorities, engaging external advisors where considered necessary.

All cross-border intercompany transactions within the Group must be in line with the international and national Transfer Pricing rules and requirements, in particular the «Arm's Length Principle» as stipulated in Art. 9 of the OECD Model Tax Treaty. These standards apply to all Swiss Life entities. However, local rules and requirements specify how to implement the Transfer Pricing Guideline in each jurisdiction. Where such domestic law provides stricter rules, Swiss Life follows such rules.

2.4 Level of tax risk the group is willing to take

Swiss Life is a highly regulated international financial group with a broad variety of stakeholders. Hence, its internal governance accepts only a low level of tax risk appetite, which must be monitored and reported to Group Tax. Tax risks are considered as part of the Group's wider internal control system (ICS). It involves the identification and assessment of several potential tax risks as well as the controls required to mitigate those risks and ensure they fall within the approved risk appetite.

2.5 Working with tax authorities

Swiss Life builds and maintains professional and constructive relationships with tax authorities in all the jurisdictions where it operates. For material transactions or tax events Swiss Life may engage with relevant tax authorities on a real time basis to agree or clarify the application of tax

legislation to such a transaction or tax event. As a large business Swiss Life is subject to annual tax audits in several countries, during which Swiss Life may discuss and agree the status of current, future, and past tax risks.

3. Tax Transparency Report

3.1 Regional Allocation

Swiss Life is committed to transparency in tax matters and provides key tax information for jurisdictions where Swiss Life operates. The following Country-by-Country Reporting ("CbCR") of Swiss Life applies reporting standards set by the OECD¹ and the GSSB² reflected in its GRI³ Sustainability Reporting Standard 207 Tax. Swiss Life makes its CbCR available to the Swiss Federal Tax Authority who exchanges the CbCR automatically with other tax authorities in concerned tax jurisdictions according to OECD requirements. In detail reported countries are listed according to main business activities of Swiss Life in the respective country.

Reporting per Jurisdictions

Rounded amounts in CHF million

Jurisdictions*	Number of Employees*	Revenues Unrelated Parties*	Revenues Related Parties*	Assets*	Profit (Loss)*	Income Tax Accrued*	Income Tax Paid*	Income Tax Rate*
Switzerland	3'646	13'769	705	30'145	811	129	147	19.0%
France	2'802	4'626	200	4'478	148	85	86	20.0%
Germany	2'296	2'598	441	2'673	184	55	50	25.5%
Luxembourg	227	504	67	1'590	184	20	7	24.5%
United Kingdom	577	101	14	14	14	3	3	19.0%
Rest of Europe	240	116	15	261	14	1	2	20.5%
Rest of World	35	10	14	1	-4	0	0	0.0%
	9'823	21'725	1'456	39'162	1'351	293	295	20.5%

*Definitions are used according to terminology of the OECD (CbCR), and the Annual Report of Swiss Life Group. Please note that allocations per Jurisdictions may deviate from Segment Reporting provided in the Annual Report. Regarding Jurisdictions of Entities please refer to Section 35 "Scope of Consolidation" in the Annual Report.

Number of employees:	Calculated as Full Time Equivalent (FTE).
Revenues Unrelated Parties:	Revenues from third party transactions.
Revenues Related Parties:	Revenues from intra-group transactions with Constituent Entities in other tax jurisdictions. Constituent Entities are any separate business units that are included in the Consolidated Financial Statements for financial reporting purposes.
Assets:	Assets held for sale, Investment Property, Property and Equipment, and Inventory of other Assets according to consolidated financial statement (meaning Assets other than Cash or Cash Equivalents, intangibles, or financial assets).
Profit (Loss):	Profit (Loss) before income tax according to consolidated financial statement. (incl. intercompany Revenues / Expenses excl. intercompany Dividends per Entity / Jurisdiction).
Income Tax Accrued:	Corporate current Income Tax accrued on profit/loss of the relevant tax period: Income Tax Accrued = Current Income Tax Expense - Adjustments for Current Tax of prior periods.
Income Tax Paid:	Corporate income tax paid on a cash basis during current fiscal year, on a cashflow view considering all tax periods.
Income Tax Rate:	Expected Income Tax Rate according to IAS 12, based on the geographical allocation of the profits (losses) before Tax according to consolidated financial statement and the applicable Nominal Tax Rates in the respective tax jurisdictions.

¹ Organisation for Economic Co-operation and Development

² Global Sustainability Standards Board

³ Global Reporting Initiative

Main business activities per country

	Insurance Life & Pension	Proprietary Asset Management*	Third Party Asset Management*	Investment Services*	Financial Advice
Switzerland	x	x	x	x	x
France	x	x	x	x	x
Germany	x	x	x	x	x
United Kingdom			x	x	x
Luxembourg	x	x	x	x	
Rest of Europe	x	x			x
Rest of World	x	x			x

*Proprietary Asset Management: Manages the assets of the Swiss Life Group insurance companies.

*Third-Party Asset Management: Manages the assets of third-party clients.

*Investment Services: Refers to investment fund, real estate, and project development services.

3.2 Income tax

Current and deferred income taxes are recognised in profit or loss except when they relate to items recognised directly in equity. Income taxes are calculated using the tax rates enacted or substantively enacted as of the balance sheet date.

Income tax expense

Rounded amounts in CHF million		
	2020	2019
Current income tax expense	266	390
Deferred income tax expense	34	-67
TOTAL INCOME TAX EXPENSE	300	324

Current income tax expense (266) = Income Tax accrued (293) – Current Tax Prior year (27)

Current income tax expense in the annual report includes adjustments for current tax of prior periods. According to OECD guidance for CbCR the reported Income tax accrued is the amount of accrued current tax expense recorded on taxable profits or losses for the Reporting Fiscal Year of all Constituent Entities resident for tax purposes in the relevant tax jurisdiction.

Reconciliation of income tax expense

Rounded amounts in CHF million		
	2020	2019
PROFIT BEFORE INCOME TAX	1351	1528
Income tax calculated using the expected weighted-average tax rate	275	291
Increase/reduction in taxes resulting from		
lower taxed income	-60	-102
non-deductible expenses	52	45
other income taxes (incl. withholding taxes)	26	29
change in unrecognised tax losses	-6	-6
adjustments for current tax of prior periods	-27	71
changes in tax rates	5	-103
intercompany effects	13	91
other	22	8
INCOME TAX EXPENSE	300	324

Tax numbers of this section and further information regarding profit taxes are published in Section "[Consolidated Financial Statements](#)" of the Annual Report of Swiss Life.

4. Other information

On 13 April 2021 the Corporate Executive Board approved this document with effect as of 01 June 2021 and is renewed annually. Swiss Life is of the opinion that this document and its publication represent compliance with paragraph 16(2) of Schedule 19 of the United Kingdom Finance Act 2016 to publish an external tax policy.