

*Tax Policy and  
Transparency  
Report 2023*

## 1. Introduction

Swiss Life is a leading European provider of life and pensions and financial solutions. By helping private and corporate clients to prepare their financial future, Swiss Life enables people to lead a self-determined life. In Switzerland, France and Germany, Swiss Life offers private and corporate customers comprehensive and individual advice plus a broad range of proprietary and partner products through its sales force and distribution partners such as brokers and banks. The 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. Swiss Life International provides multinational corporations with employee benefits solutions and high net worth individuals with structured life and pensions products. Several subsidiaries are also part of the Swiss Life Group. At the end of 2023 the Swiss Life Group employed approximately 10 000 people worldwide and had a network of around 17 000 advisors.

## 2. Tax Policy

### 2.1 Commitment to compliance

Swiss Life takes its corporate responsibilities seriously, in its business operations, its role as an employer as well as 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 Organisation for Economic Cooperation and Development's (OECD) principles on corporate governance.

A key 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 persistently challenging capital market environment.

Risk management is a key component of Swiss Life's management process. The responsible committees of the Corporate Executive Board and the Board of Directors continually monitor and manage risks, and their decisions are then incorporated into the annual planning process.

Swiss Life sets great store by compliance with all legal provisions and regulatory requirements. 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 Group CFO, the Group Head of Taxation supports the Board of Directors and the Group Executive Board in all tax matters pertaining to the Swiss Life Group. The Group Head of Taxation has overall functional responsibility, overseeing and coordinating the activities of the local Tax Services Functions.

The Division CFO and the Tax Services Divisions are responsible at their level for day-to-day tax questions and compliance with the overall tax policy of the Group. The Tax Services Divisions report functionally to the Group Head of Taxation. 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 organise its commercial activities to create sustainable value for its stakeholders. The Group is committed not to use low or no tax jurisdictions or so-called «tax havens» for tax planning or other purposes. 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 in transactions that are purely tax driven without commercial substance 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 when 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 under consideration of local rules and requirements that 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 OECD<sup>1</sup> and the GSSB<sup>2</sup> reflected in its GRI<sup>3</sup> 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 2023 per Jurisdiction

	Number of Employees*	Revenues Unrelated Parties*	Revenues Related Parties*	Assets*	Profit (Loss)*	Current Income Tax Accrued*	Current Income Tax Paid*	Income Tax Accrued*	Income Tax Rate*
Switzerland	3'697	4'837	812	32'034	671	133	202	124	18.5%
France	2'853	3'182	708	4'371	-37	26	29	49	38.0%
Germany	2'565	1'783	496	3'747	65	42	49	21	36.7%
Luxembourg	285	933	150	2'496	617	13	36	46	23.0%
United Kingdom	613	128	16	17	28	7	7	7	23.7%
Rest of Europe	398	659	106	215	19	9	3	8	44.8%
Rest of World	29	20	0	1	1	0	0	0	13.3%
	10'442	11'542	2'289	42'879	1'366	229	326	254	27.0%

\*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 31 «Scope of Consolidation» in the Annual Report. The Tax Rate for France of 38% does not include certain French real estate entities with negative fair value changes.

Number of employees:	Calculated as Full Time Equivalent (FTE) as per 31.12.2023.
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 (i.e. Assets other than Cash or Cash Equivalents, intangibles, or financial assets) as per 31.12.2023.
Profit (Loss):	Profit (Loss) before income tax according to consolidated financial statement (incl. intercompany Revenues / Expenses excl. intercompany Dividends per Entity / Jurisdiction).
Current Income Tax Accrued:	Corporate Current Income Tax accrued according to IAS 12.
Income Tax Accrued:	Corporate Current Income Tax + Deferred Income Tax accrued according to IAS 12.

<sup>1</sup> Organisation for Economic Co-operation and Development

<sup>2</sup> Global Sustainability Standards Board

<sup>3</sup> Global Reporting Initiative

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.

### 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	x
Luxembourg	x	x	x	x	
Rest of Europe	x	x	x	x	x
Rest of World	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		
	2023	2022
Current income tax expense	229	347
Deferred income tax expense	25	132
<b>TOTAL INCOME TAX EXPENSE</b>	<b>254</b>	<b>479</b>

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		
	2023	2022
PROFIT BEFORE INCOME TAX	1366	1934
Income tax calculated using the expected weighted-average tax rate	368	388
Increase/reduction in taxes resulting from		
lower taxed income	-184	-131
non-deductible expenses	85	131
other income taxes (incl. withholding taxes)	61	40
change in unrecognised tax losses	32	28
adjustments for current tax of prior periods	-82	24
changes in tax rates	5	10
intercompany effects	17	-47
other	-46	37
INCOME TAX EXPENSE	254	479

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

## 4. Other information

Our Tax policy is reviewed annually by tax experts of all divisions and approved by the Corporate Executive Board of Swiss Life. On 14 May 2024 the Corporate Executive Board of Swiss Life approved this document with effect as of 01 June 2024 according to the annual review and renewal procedure. Swiss Life is of the opinion that this document and its publication is compliant with paragraph 16(2) of Schedule 19 of the United Kingdom Finance Act 2016 to publish an external tax policy.