

Markel International.

UK Tax Strategy Document

Introduction

Markel International (MINT) is a UK based group, the members of which are subsidiaries of Markel Corporation, a U.S. based diverse financial holding company. The principal business of the MINT group is the marketing and underwriting of specialty insurance products.

The Markel Style is our corporation's statement of commercial ethos and is found at www.markelcorp.com/about-markel/markel-style

Markel's financial goals are to earn consistent underwriting and operating profits and superior investment returns to build shareholder value. The tax strategy of the MINT group is consistent with such objectives. Markel has a strong focus on corporate responsibility and a commitment to the communities in which it operates and we consider responsible administration and payment of taxes as an obligation of our doing business.

Our overall tax strategy is to:

- Pay the right amount of tax, in the right jurisdiction and at the right time, in accordance with applicable laws
- Consider tax in major business decisions as well as in the context of our reputation and brand
- Develop and comply with appropriate tax risk processes and ensure Board oversight with respect to such processes and compliance

Above all the MINT tax strategy reflects the honesty and fairness that we commit to in the Markel Style.

Our attitude towards tax planning

We seek to deliver long term economic growth value to our shareholders while complying fully with tax laws and regulations that apply in all the territories in which we operate. In our view our shareholders would expect no less.

While we undertake tax planning as part of our overall business strategy we do not enter into abusive tax planning transactions nor do we engage in transactions that have no commercial rationale in order to obtain a tax benefit. From time to time we do undertake transactions that have a clear commercial rationale and that also produce a beneficial tax outcome. In those circumstances we take into account both the letter of the law and the intent of the law – seeking counsel from external experts where appropriate – to ensure that our interpretation of the law is reasonable and consistent with market practices

Our tax risk appetite

Our tax arrangements are based on commercial business and economic activities. We rarely undertake transactions or employ tax planning strategies that do not have a clear and certain tax outcome. When such circumstances do arise we seek professional opinions and tax advice from independent external advisors to provide comfort that the tax outcome is more likely than not to be correct. Where appropriate we seek to engage with tax authorities to disclose and resolve tax issues, risks and uncertain tax positions.

Our approach to tax risk management and governance

As taxation is a key component of meeting our wider business objectives we believe that tax risk should be prudently managed. To that end we have established policies for the management and governance of tax risks and regularly review the processes and controls embedded in those policies. We consider that governance of tax risk exposure is a matter for MINT's Board of Directors to whom the UK group Finance Director provides updates on taxation matters. All members of the MINT group are required to comply with the Markel risk management framework and tax risk is reviewed periodically by Risk Management and on an ad-hoc basis by Internal Audit. Additionally we engage regularly with our external auditors to whom we make a full and complete disclosure of all material taxation issues as part of their audit.

Our approach towards dealing with the taxation authorities

In keeping with the ethos of the Markel Style we seek to maintain open and honest relationships with HMRC and other taxation authorities in all the territories in which we operate, to treat them with the respect that we would in turn expect from them and to engage with them on a real time basis on any matters of significance or concern. In the UK we regularly engage with HMRC through our Head of Tax to discuss our tax affairs, striving to address potential issues quickly and in a collaborative manner. In short, we endeavour to display respect, cooperation and integrity in all our dealings with tax authorities.