Brevan Howard

April 2025

Global Tax Strategy

OVERVIEW

Brevan Howard's objective is to pay the appropriate amount of tax at the appropriate time in each relevant jurisdiction based on the commercial activities undertaken in accordance with both the letter and the spirit of the law in each jurisdiction.

This memo sets out Brevan Howard's global tax strategy which it applies to the Brevan Howard group of affiliated entities (the "Group" or "Brevan Howard"). Additionally, this memo sets out the governance arrangements that are in place to oversee Brevan Howard's tax affairs, the tax risks the business faces and information on how these risks are managed and controlled.

STRATEGY

Our tax strategy aligns with and supports our wider strategic aim of providing long-term value to the owners of the Brevan Howard business. To achieve this, we:

- Ensure that tax returns and tax payments are accurate and made on time, and disclose and rectify any mistakes that come to light at the earliest opportunity;
- Recognise that the Group has a responsibility to pay an appropriate amount of tax in each of the jurisdictions in which it operates and not view tax simply as a cost to be minimised;
- Do not use marketed tax avoidance schemes or undertake transactions to achieve a tax advantage that are not supported by commercial activities;
- Consider the tax consequences as part of every major business decision;
- Operate effective tax risk governance processes to identify and manage tax risks in line with the Group's risk appetite; and
- Do not tolerate tax evasion in any form and ensure that appropriate preventative procedures are maintained to reduce the risk that tax evasion is facilitated by any persons acting for or on behalf of the Group.

The tax strategy will apply to all relevant direct and indirect taxes across all Brevan Howard entities in every jurisdiction in which the business operates.

GOVERNANCE

Brevan Howard's tax strategy is owned on behalf of the Group by the board of directors of Brevan Howard Capital Management Ltd ("BHCML"). The strategy, and compliance with it, is reviewed annually. Day-to-day management and implementation of the strategy is delegated to Brevan Howard's internal tax department based in the UK and the US, overseen by the Head of Tax.

TAX RISKS

As a multi-national business with operations in multiple jurisdictions, Brevan Howard is exposed to a variety of tax risks that it aims to manage and control. Broadly, these risks can be grouped under the following headings:

1. **Tax compliance and reporting risks**, which cover risks associated with tax compliance failures such as submission of late or inaccurate tax returns or where finance or operational systems and processes are not sufficiently robust to support tax compliance and reporting requirements;
2. **Transactional risks**, which arise where transactions are carried out or actions are taken without appropriate consideration of the potential tax consequences or where advice taken is incorrect or not correctly implemented;
3. **Operational business risk**, which covers risks associated with our global operating processes which could disrupt standard processes and therefore increases tax risk for the group; and
4. **Reputational risk**, which looks beyond financial risks to the wider impact tax can have on our relationships with our stakeholders, including shareholders, investors as well as local and overseas tax authorities.

Management and control of tax risks

The Group has a limited risk appetite for all operational risks, including tax risks, across its global business. It will therefore seek to actively manage the tax risks it faces by doing the following:

- The Group will ensure that it maintains an internal tax department consisting of appropriately senior and skilled tax professionals. The department will provide advice to the Group on tax-related issues, undertake or assist with tax filings, manage relationships with external advisors and tax authorities and assist with tax and financial reporting;
- Brevan Howard's tax department will be involved in the early stages of any new business proposal to ensure that the tax consequences are appropriately considered at an early stage;
- Where necessary, the Group will engage qualified and experienced external tax advisors to discuss and validate our understanding of relevant tax legislation and tax authority practice and to assist us in complying with the tax legislation in the jurisdictions in which we operate;
- Where appropriate, we will actively engage with tax authorities in all jurisdictions in which we operate in an open and transparent manner and to disclose and resolve issues, risks and uncertain tax positions with honesty and integrity and in a timely fashion;
- Seek to comply with local law requirements on the retention of tax-related documentation; and
- Where necessary, Brevan Howard's tax department will monitor and analyse the impact of global events (such as the recent C-19 pandemic) on our operating procedures and ensure that the increased tax risk associated with the disruption is mitigated to the fullest extent possible.