

# UK Branch Tax Strategy

SVB Financial Group ("SVB Financial") is a diversified financial services company, as well as a bank holding company and a financial holding company.

We offer commercial and private banking products and services through our principal subsidiary, Silicon Valley Bank (the "Bank"), which is a California state-chartered bank founded in 1983 and a member of the Federal Reserve System. The Bank's core business is focused on innovation, including technology, life sciences, cleantech, premium wineries, and private equity/venture capital.

The Bank's UK Branch provides financial services to businesses across the technology and innovation landscape in the UK, including loans, deposits, cash management products and foreign exchange management. It is not involved in private or retail banking services to individuals.

## Introduction

Our tax strategy is consistent with our values. We are committed to helping the communities in which we work and live and therefore recognise the importance of paying the right amount of tax at the right time. Our key tax objective is to ensure we pay the right amount of tax as required by tax regulations and comply with our tax obligations in all tax jurisdictions in which we operate. Tax for this purpose includes all taxes that we incur on our business operations, as well as tax that we collect on behalf of the government, such as withholding taxes and employment taxes.

## Our approach to risk management and governance arrangements in relation to UK taxation

We have adopted and comply with HMRC's Code of Practice on Taxation for Banks. Effective tax risk management is crucial to us and we have robust internal tax controls which we proactively monitor and manage in order to mitigate key tax risks that are identified from an overall organisational perspective. The objectives of these controls are to provide reliability, completeness and integrity of information; to comply with policies, plans, procedures, laws and regulations; to provide economical and efficient use of resources; and to accomplish our objectives and goals for operations.

Additionally, our internal control team tests these key tax controls on a quarterly and annual basis. Whenever the Bank undertakes a significant transaction or change in business, there is significant uncertainty or complexity, we seek external advice to ensure the tax impact is suitably evaluated and documented. Any key tax risks are communicated to our Group Board and Audit Committee on a quarterly basis.

The EMEA Chief Financial Officer is responsible for tax compliance within the UK Branch.

## Level of acceptable tax risk

The UK Branch's attitude to tax risk is low and the UK Branch has not historically pursued overly aggressive or high-risk planning opportunities, and this continues to be the case.

## Our attitude towards tax planning

Our key tax planning objective is to maximise long term shareholder value in relation to the tax impacts of our business activities at a risk level consistent with all applicable rules, regulations, our reputation and the Banking Code of Conduct.

We take a conservative approach to tax planning by ensuring all transactions have a commercial rationale, producing tax results that are compliant with tax laws and regulations. We do not enter into structures or schemes where the main purpose is the avoidance of tax and we do not promote aggressive tax planning strategies. Currently, we operate under a simple organisational structure from both a business and tax perspective which has been established in accordance with regulatory requirements.

Tax planning or structuring advice may be sought in the context of any complex transactions or long-term corporate business strategic planning objective. Key tax planning strategies will be presented to and approved by our Group Board, Audit Committee and Executive Committee and, where appropriate, our UK governing body.

## Approach towards our dealings with HMRC

We have an open, transparent, and collaborative approach when communicating and working with HMRC and ensure that we engage with integrity, honesty and respect. We aim to file our tax returns in a timely manner and provide prompt responses to queries from HMRC. Where appropriate, we proactively communicate and engage with and disclose any issues to HMRC.

**This tax strategy applies to the year ending 31 December 2019. Our strategy is compliant with the requirements of para 16(2) and 25(1) of Schedule 19, Finance Act 2016.**