

U.K. tax policy statement

1. Introduction

This policy sets out the UK tax strategy relating to the business and operations of Ares Management LP and all of its affiliated entities and partnerships (“**Ares**”). By making this policy publicly available, Ares regards this policy as compliant with the UK tax strategy publication requirement.

This tax policy applies to taxes applicable to those entities subject to UK tax.

2. Principles

Ares is committed to:

- (a) acting as a responsible global tax citizen;
- (b) complying with international tax laws (including UK tax laws) taking into account not only the letter of the law but clearly discernible legislative policy;
- (c) meeting internationally recognised standards by applying transfer pricing policies such as the arm's-length principle;
- (d) ensuring payment of taxes; and
- (e) maintaining a good open working relationship with tax authorities it deals with.

3. Minimising level of tax risks

Ares seeks, where possible, to minimise the risk of uncertainty or disputes.

Ares is committed to paying taxes due to HM Revenue & Customs (“HMRC”) at the right time, and to ensuring its compliance with all relevant tax regulations.

The pursuit of artificial tax arrangements is not undertaken and it is Ares’ goal to ensure that the outcomes are consistent with commercial realities.

Diligent professional care and judgement will be employed to assess tax risks in order to arrive at well-reasoned conclusions on how the associated risks should be managed. Where there is uncertainty as to the application or interpretation of tax law, appropriate advice evidencing the facts, risks and conclusions may be taken from third party advisers to support the decision-making process.

Ares engages in and seeks dialogue with tax authorities in the countries where it conducts major business operations on a continuous basis.

4. Tax risk management

Ares complies with applicable tax laws and practices in the territories in which it operates, which means that Ares manages tax affairs to adhere to the relevant rules with respect to determining the bases for its worldwide tax liabilities, the timing of tax payments and disclosing all relevant facts and circumstances to applicable tax authorities.

Ares routinely instructs external advisers to ensure that tax risks are identified and any tax positions taken by us are backed by the opinions of experts.

5. Appetite towards tax planning

Where there are alternative ways of conducting its business or structuring a transaction, Ares may choose the alternative which achieves the commercial aims of the business with the lowest tax cost. However, Ares will not enter into any non-commercial arrangements where the only purpose is to reduce the tax burden of the business, nor will it seek to utilise any scheme that is artificial in nature and that seeks to provide benefit beyond the apparent intent of the legislation.

Where tax incentives and exemptions are implemented by the Government to support investment, employment and economic growth, Ares may seek to apply them in the manner intended.

6. Approach to dealings with HMRC

Ares seeks to develop open working relationships with tax authorities worldwide based on transparency and trust, while seeking consensus and avoiding conflict. Ares shall make any required disclosures to tax authorities promptly and take a proactive approach to resolving any tax disputes with tax authorities. Ares takes a constructive, cooperative and open approach to all aspects of engagements with HMRC.

7. Governance

This policy is designed by and managed by the Ares Chief Legal Officer, Global Head of Tax and Head of European Tax.