

PIMCO Prime Real Estate GmbH - UK branch – Tax Strategyⁱ

Financial year ended 31 December 2023

This tax strategy applies to PIMCO Prime Real Estate GmbH - UK branch (the “Company”).

As a subsidiary within the Allianz Group, the Company operates within the Allianz Group tax governance framework and day to day responsibility for managing its tax affairs is delegated to group tax resources at its parent company, PIMCO Europe GmbH AG München, and within the wider Allianz Group. In doing so, it is acknowledged that the Company retains ultimate responsibility for its tax affairs and for its relationship with tax authorities.

Consistent with the objectives of the wider Allianz Group, the Company’s key objective is to seek to ensure that it is in full compliance with the tax regulations in all countries in which it operates.

The Company operates as a responsible tax payer and collector. This includes providing accurate and timely reporting to tax authorities, and undertaking effective tax risk management. Where there is any significant uncertainty or complexity in relation to a tax risk, internal or external advice is sought.

Any tax planning and optimisation activities undertaken are compliant with tax laws and supported by solid business reasons to sustain a credible long term reputation with tax authorities.

The Company engages with tax authorities, including HMRC, with honesty, integrity, respect and fairness and in a spirit of co-operative compliance. Should a disagreement with a ruling or decision of a tax authority ever arise, the Company would first seek to resolve any disputed matters in a cooperative manner, through pro-active and transparent discussion and negotiation.

This strategy is approved, owned and overseen by the Company’s Senior Officers.

ⁱ The purpose of this statement is to satisfy the UK legislative requirements of paragraph 19(2) Schedule 19 Finance Act 2016 in relation to the publication of tax strategy insofar as it affects the Company. This covers the period ending December 2023 and we review and refresh our tax strategy annually