

Virtu Financial LLC

UK Tax Strategy Statement

INTRODUCTION

This Statement summarises the approach by which the Virtu Financial group of companies (“Virtu”, “the Virtu Group”, “the Group”) addresses the management of tax in our UK business. The Statement aims to meet the requirements of the UK Finance Act 2016 for certain groups to publish, in a publicly available manner, a UK tax strategy statement. We regard this Statement as fulfilling, for the year ending 31 December 2021, our duty to publish a UK tax strategy document under Schedule 19 of the Act.

BACKGROUND

Virtu is a US-headquartered securities firm offering investors a range of services designed to address trading needs across asset classes, product types and time zones. The firm combines advanced technology with exceptional client service across market making, agency execution and venues.

The Virtu Group’s operations in the UK consist predominantly of supporting trade execution services in a wide range of financial instruments and currencies.

APPROACH TO TAX GOVERNANCE AND RISK MANAGEMENT

The Virtu Group’s operations in the UK give rise to a range of UK tax payment and reporting obligations, primarily arising under corporation tax, PAYE/NIC and VAT legislation.

The Group aims to comply with all applicable tax obligations and ensures that there is clear responsibility allocated for compliance with relevant UK tax obligations.

Primary responsibility for UK tax, at Senior Management level, rests with the European Head of Finance. The responsibility covers the fulfilment of the Group’s UK tax obligations and its approach to management of UK tax matters generally. The European Head of Finance delegates specific areas of responsibility to appropriate members of the European Finance team.

For any aspects of tax compliance where external professional support is required, the Group engages an appropriately skilled professional firm and service team.

The Group’s UK operations’ broader framework of governance over financial and legal matters provides a solid foundation for the management of tax compliance and tax risk matters. Any significant judgements or choices to be made in relation to UK tax matters are escalated to an appropriate level of management. In addition, when any significant doubt arises in relation to a UK tax matter, Virtu obtains appropriate external advice from relevant professionals.

We also maintain active interaction with professional firms in relation to potential changes in UK tax law that may be relevant to our business and, in particular, our UK tax compliance obligations.

ATTITUDE IN RELATION TO TAX PLANNING

The Group aims to be in full compliance with all relevant UK tax law, both in letter and in spirit in accordance with the aims of the Group’s Code of Business Conduct and Ethics. We seek to claim benefit from available UK tax reliefs and incentives where applicable. We also seek to ensure that



our approach to UK tax planning is consistent with our broader commercial objectives and is not artificial or contrived, informed by external professional advice as and when appropriate.

The Group values its business reputation and aims to conduct itself consistently with Virtu's core values of honesty and integrity. Virtu will always take into account our business reputation with all of our stakeholders in managing our tax affairs.

TAX RISK APPETITE

Consistently with our attitude to tax planning, we maintain a low level of appetite for tax risk. While it may be impossible to eliminate entirely the risk of a difference of view with HMRC (or any other tax authority) on a specific tax issue, we seek to control and minimize the possibility of any material difference arising.

As indicated above, in the event of any significant tax uncertainty arising on any relevant UK tax matter, the Group consults its external advisers to ensure any position it adopts is soundly based in law.

VIRTU GROUP'S RELATIONSHIP WITH HMRC

The Virtu Group aims to be responsive, professional and transparent in its dealings with HMRC. We aim to provide all required information to HMRC on a timely basis and with no gaps versus expectations.

We believe that constructive engagement with HMRC, when the occasion arises, contributes positively to our achievement of high standards of compliance with UK tax and a responsible approach to tax planning. For tax items that are sufficiently material and we view as having more than one interpretation, we look to enter into dialogue with HMRC at an early opportunity.

We also believe that a positive relationship with HMRC contributes strongly to the maintenance of our desired low levels of tax risk in the UK business

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