



VYNOVA Runcorn Limited, Bankes Lane Office, Bankes Lane, PO Box 9, Runcorn, Cheshire, WA7 4JE

Vynova Group UK Tax Strategy for the Year Ending 31 December 2022

Scope

Vynova Runcorn Limited publishes this Tax Strategy covering its approach and attitude for handling its tax affairs and managing the tax risks in the UK.

This Tax strategy for the year ending 31 December 2022 is compliant with the UK legislative requirements of Paragraph 16 (2), Schedule 19, Finance Act 2016. This publication is freely and publicly available online for stakeholders to understand the approaches adopted when dealing with the UK taxation.

Introduction

Vynova is a leading European chemical manufacturer which has operations in five countries. In Runcorn, we produce ethylene dichloride (EDC), an essential intermediate for the production of PVC. The main building block of this is chlorine (Cl₂), produced in our JV with Inovyn combined with externally bought ethylene (C₂). The by-product when producing Cl₂ is caustic soda (NaOH), sold into the market by Vynova Belgium. It is a basic chemical used by our customers to make a wide range of end products for daily life.

The Group's objective is to ensure full tax compliance with all relevant laws, regulations, and reporting and disclosure requirements in the jurisdictions it operates in. The UK Group is committed to paying its fair share of UK taxes on time and submit all the legally required documents to the tax authority, HM Revenue & Customs ('HMRC'), on a timely and accurate basis. This is underpinned by a policy of cooperation, transparency, and full disclosure.

Tax risk management and governance

Ensuring tax compliance obligations are met is fundamental to our risk management.

Ultimate responsibility for overall corporate governance and tax risk management for the global group sits with the Board of the Group in Belgium. The executive management team exercises professional competence and judgement to identify, assess, manage and mitigate any potential tax risks.

The Finance Team in Belgium is responsible for the day-to-day management of the Group's tax affairs and work closely with the UK Finance Team to ensure the fulfilment of all UK tax obligations and the implementation of tax risk management procedures across all UK subsidiaries.

Where Vynova does not have the adequate expertise in certain areas of UK tax, it engages external tax advisors to provide additional support.

Acceptable levels of tax risk

Being a multinational business, Vynova is exposed to a level of tax risk due the complexity of the international tax system. There may be different interpretation of tax legislation across territories applying the arm's length principle to establish appropriate transfer prices and profit allocation in line

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with OECD guidelines. The UK Group endeavours to mitigate, manage and monitor these risks through appropriate risk management. In cases where significant uncertainty regarding to a risk arises, additional support from external UK tax advisors may be sought.

Tax planning

The group has an obligation to ensure it is returning as much value to shareholders as possible and this will include mitigating double taxation and taking advantage of incentives and reliefs such as capital allowances. In the engagement of a prospective transaction, decision making is determined by commercial and economic considerations rather than tax consequences. Tax driven structures are not entered into and Vynova does not endeavour to achieve a tax advantage that arises from aggressive tax planning or abusive tax arrangements. Tax advantages are only received through legislated tax reliefs or appropriate tax arrangements that are accepted by the UK tax laws. All intercompany transactions between subsidiaries are undertaken on an arm's length basis and are aligned with the OECD guidelines.

Relationship with HMRC

Where appropriate, Vynova works collaboratively with HMRC in an open, transparent and professional manner. The UK Group remains compliant with all statutory filing requirements and provides sufficient tax disclosures to HMRC on an accurate and timely basis. Any decisions concerning tax are taken with consideration to Vynova's wider reputation and relationships with all stakeholders.

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