

MILLIKEN INDUSTRIALS LIMITED

2021 TAX STRATEGY

As UK trading subsidiaries of the US headed Milliken and Company worldwide group of companies, Milliken Industrials Limited, Borchers Additives Ltd and Borchers Catalyst (UK) falls within the definition of a Qualifying Company for the purposes of paragraph 5(3) of Schedule 19, Finance Act 2016. This paper sets out the tax strategy of all 3 companies and by making this strategy available, the company is fulfilling its obligations under paragraph 22 of Schedule 19 of Finance Act 2016.

Overview of our group's approach to tax strategy

Our business has a strong focus on corporate responsibility and we see responsible administration and payment of taxation as a responsibility of our business.

Milliken's Associate Code of Conduct sets out what is expected of everyone at Milliken in terms of compliance and ethical behavior generally and our approach to tax aligns with that.

Our overall tax strategy is to:

- Meet all applicable legal requirements and to make all appropriate tax returns and tax payments;
- Seek to utilize available tax reliefs and incentives where available in a manner which is consistent with the government's policy objectives;
- Consider the tax impact in major or complex business decisions, for example in acquisitions;
- Operate in an environment where we consider tax in the context of our reputation and brand; and
- Comply with appropriate tax risk processes, and ensure there is Board oversight into this compliance.

Milliken Industrials Limited / Borchers Additives Ltd / Borchers Catalyst (UK)

The sections that follow set out the group's approach to risk management and governance, tax planning, tax risk and our approach when dealing with tax authorities, as pertains to Milliken Industrials Limited / Borchers Additives Ltd / Borchers Catalyst (UK) and to UK taxation.

Risk management and governance arrangements

The group head of tax owns and implements our approach to tax and is responsible for ensuring that policies and procedures that support this approach are implemented, maintained and used consistently around the world.

We want our tax affairs to be compliant with tax legislation, and recognize that managing tax compliance is increasingly complex. Our internal structure is set up to ensure:

- The UK Board of directors understand the importance of tax compliance, and how it is achieved;

- Those individuals tasked with the operation of our finance function own the way our business manages its tax risk in consultation with our US Tax department; and
- The business portrays a positive view towards tax compliance and the importance of meeting our obligations.

We keep under review how we meet our tax obligations by seeking external tax advice, investing in tax training for our staff and also monitoring how we manage our relationship with tax authorities.

Tax planning

We undertake tax planning as part of our overall business strategy. Professional advice is sought on a transactional basis, with the depth of such advice being driven by our assessment of the risk presented by each opportunity.

We adhere to relevant tax law and do not engage in artificial tax arrangements, the sole purpose for which would be to obtain a tax advantage. We have a responsibility to minimize our tax risk and our exposure to negative publicity through non-compliance.

We conduct transactions between Milliken group companies on an arms-length basis and in accordance with current OECD principles.

Attitude towards risk

The Board sees compliance with tax legislation as key to managing our tax risk. We understand the importance of tax in the wider context of business decisions and have processes in place to ensure tax is considered as part of our decision-making process.

We have relationships with professional advisers that allow us to seek expert advice on specialist areas of tax. Our approach is to ensure we are compliant and understand our responsibilities with regards to tax, rather than looking for ways to aggressively avoid payment of tax.

The Board is conscious of the hugely negative publicity attracted by a bad attitude towards tax and sees strong internal processes and a good relationship with our professional advisors as the best way to manage this reputational risk.

Relationship with HM Revenue & Customs (HMRC)

Our communication with HMRC is focused around timely tax compliance, for example meeting relevant filing and payment deadlines for taxes the company pays.

We employ the services of professional tax advisers to act as our agents and, in a number of cases, they liaise with HMRC on our behalf, to help us build a collaborative relationship with HMRC and reduce our tax risk.