



## 1 Who we are

Omya is a leading global producer of industrial minerals based in Switzerland. This product category mainly includes fillers, modifiers and pigments derived from calcium carbonate and dolomite. In addition to being a producer of industrial minerals, Omya group is also a worldwide distributor of specialty chemical products. The group's major markets are the paper, plastics, paint/coatings/adhesives industries as well as construction, environment, agriculture, food and pharma.

Founded in the 19<sup>th</sup> century in Switzerland, Omya group is still headquartered at its original founding place in Oftringen, Switzerland. Today, Omya group has a global presence extending to more than 175 locations in over 50 countries with 8,000 employees.

Since the early days, Omya group has strived for excellence. This translated into state-of-the-art innovative products and superior customer service which today form the core of the values transported by the Omya brand. This would not have been possible without a strong focus on processes and constant technical innovation.

In Switzerland, Omya has consistently developed its products, manufacturing techniques and application know-how supported by its R&D activities performed by its central R&D facilities in Oftringen, Switzerland.

Although Omya group has a centralized management structure and a centralized approach in view of intellectual property, the need for a strong locally rooted presence close to customers has always been recognized as important to its business and customer satisfaction. Thus, Omya group has been present in the UK for many decades.

Omya UK Limited is a fully owned subsidiary of Plüss-Staufer Limited located in UK. The ultimate parent company is Omya AG, a holding company established under Swiss law in Oftringen, Switzerland. Omya UK Limited processes chalk, dolomite, limestone and marble in its production plants in various locations in the UK to produce Calcium Carbonate fillers and coating pigments used by numerous industries and product applications. Omya UK Limited also operates a chemical manufacturing plant [Humber plant] in East Yorkshire. The Humber Plant supplies calcium oxide, other powders and chemical blends into the rubber and plastics industries. Along with Calcium Carbonate products, Omya UK Limited sells complementary products, such as specialized chemicals, sourced from well-known principals from around the world either as a distributor or as an agent on a commission basis.

## 2 Our Values

Modesty, courtesy, integrity and perseverance summarize how Omya people behave vis-à-vis customers, partners and colleagues. These four Omya values are the most visible expression of the company's style and a key ingredient of its corporate identity. All employees are committed to living the Omya values in their daily work.

**Modesty** stands for a low-key, unassuming attitude towards Omya's customers and partners.

**Courtesy** means to be polite and respectful vis-à-vis other cultures and human individuals, whatever their level or function.

**Integrity** translates into "doing the right thing". Omya always abides by the law and acts in compliance with its rules and values.

**Perseverance** connotes to "never give up". Omya people always keep focused and committed to realistic goals.



## 3 Purpose

Globalization is still accelerating, there are shifts in the economy and one can observe an extremely rapid succession of tax policy and legislative changes all over the world. This results in more complexity and uncertainty.

The purpose of this document is to provide the overarching principles of dealing with these challenges in the field of taxes.

## 4 Applicability and Ownership

This tax strategy applies to all UK subsidiaries of the Omya group.

Omya Group principles apply worldwide and derive from a global tax policy that is cascaded down to subsidiaries.

This tax strategy is derived from globally applicable principles developed and supported by the group.

Ownership of this tax policy is by the UK Executive Management supported by the group functions and approved by UK Board of Directors.

## 5 We are compliant and manage our tax risks

### 5.1 Compliance with UK laws and regulations

Compliance encompasses the pure filing of tax returns and paying of the tax due but includes the monitoring and managing of the respective risks and the following and adoption of developments in UK tax laws and regulations.

Omya is committed to being compliant and abide by the laws and act as a good corporate citizen and a trustworthy tax payer.

### 5.2 Effective tax risk management

Compliance, monitoring and managing of tax risks are high on the agenda of the UK Executive Management.

As a group, Omya are aware of the responsibility to comply in full, with laws in the countries operated in. A central corporate team help coordinate and advise the individual countries on tax issues. Topics such as the OECD international tax reform work on Base Erosion and Profit Shifting (BEPS) are controlled centrally with a standard/harmonised approach orchestrated by Omya group.

We follow group corporate policies and Internal Control Systems to support our tax control framework. As an example, we work on an integrated ERP system (SAP) used for all transactional business. All tax settings are controlled by a central tax department in coordination with local finance personnel. Tax computations and filings are carried out with assistance from reputable tax consultants to ensure accuracy and compliance. Tax declarations and submissions are subject to review by management before submission to HMRC.



## 6 We manage our tax risks in a responsible manner

### 6.1 “Best of our Knowledge” approach

We are firmly committed to do the right thing and always act to the “best of our knowledge”. In assessing tax risks, we seek support from specialist group functions as well as from external advisors where appropriate or reach out to HMRC, via our agent, when warranted.

### 6.2 Acknowledging ambiguity of interpretation

Given the complexities of ever faster changing tax laws and interlinking international transactions involving several tax jurisdictions, it must be acknowledged that by the nature of the very matter, laws and regulations may be subject to interpretation either due to a lack of case law or diverging views of different tax jurisdictions. In these circumstances we always act to the best of our knowledge and in the legitimate interest of our business and stakeholders.

## 7 Our attitude towards Tax Planning

### 7.1 Consistency with our values / integrity of the company

We take a long term and sustainable view of tax planning, fully aligned with the values and principles of the group as detailed above.

### 7.2 Planning with commercial rationale / alignment

The operational requirements of the Omya group, first and foremost, dictate how the business is structured. Whilst tax can deliver additional value to the company and should be considered with regards to any business transformation or material transaction, business requirements and needs should be and actually are prioritized. Where business flexibility is possible, or where there is no adverse business consequence, then legitimate tax opportunities and benefits may be pursued. The group does not engage in contrived planning or artificial structures.

### 7.3 Legitimate use of free choice and opportunities

Our tax principles are aligned with a long-term vision and approach, identifying opportunities and implementing legitimate incentives but not seeking overly aggressive short-term gains at the detriment of the Omya values and / or Omya’s reputation and trustworthy standing with the competent authorities.

### 7.4 Living the arm’s length principle

Omya has a strong local business focus but in case of dealings with foreign subsidiaries, all transactions reflect actual business requirement and are rooted on sound economic need based on the arm’s length principle and supported by comprehensive Transfer Pricing documentation and benchmarking. The group does not engage in artificial transactions.

## 8 Our relationship with HMRC

Communication with HMRC is focused on 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 its agent and, when required, they liaise with HMRC on its behalf. This is seen by the board as a way to optimize the relationship with HMRC, thus maximizing a strong and transparent relationship and reducing our tax risk.