

## **Venator UK Group Tax Strategy**

As required by His Majesty's Revenue and Customs (HMRC) and in accordance with paragraph 16(2), Schedule 19 of the Finance Act 2016, this document sets out the tax strategy for the Venator group of companies operating in the UK ("Venator UK") for the year ending 31 December 2025.

### **Insolvency Processes**

The following Venator companies entered into Administration on 2 September 2025:

- Venator Materials PLC
- Venator Materials International UK Limited
- Venator Investments UK Limited

In addition, Venator Materials UK Limited entered into Administration on 22 October 2025

As a result of the processes, the respective Joint Administrators are responsible for the taxation affairs for the companies over which they are appointed. Whilst not directly responsible for the other UK Venator companies, the Joint Administrators have not actively done anything, or refrained from doing anything, to deviate from the application of this strategy to those other UK companies.

This strategy applies to all companies that Venator UK operates in the UK, subject to the above caveats.

### **Overview of the Group's business**

The Venator group (the "Group") has operated as a chemicals company and has been committed to the safe, sustainable and responsible manufacturing of high performance TiO<sub>2</sub> pigments and performance additives.

The Group has been focused on delivering pigments and additives that make a difference to daily life and contribute to a more sustainable future. The Group has been focused on the production of Titanium Dioxide and Performance Additives and has been a leading global producer in many of its key product lines – including TiO<sub>2</sub>, colour pigments, functional additives and timber treatment products.

Based in Wymondley, UK, the Group's products have been sold in many countries worldwide.

### **The Group's approach to risk management and governance arrangements in relation to UK taxation**

The Group's tax strategy is reviewed periodically and at least once per year. The Joint Administrators of Venator Materials PLC are responsible for the affairs of that company, and are working with the senior management team and boards of directors of other companies in the Group in relation to the management of the Group's worldwide tax affairs.

The Group's tax department previously reported to the Vice President, Tax and Treasury and has responsibility for tax risk management. The tax department proactively seeks to identify, measure, manage and monitor tax risks. It may also seek external advice, where relevant.

The Group does not tolerate or facilitate tax evasion. It operates a robust control environment and continually reviews the procedures and safeguards it operates to prevent a corporate criminal

offence being committed under the Failure to Prevent Facilitation of Tax Evasion legislation, as introduced in the Criminal Finances Act 2017.

The Group's operations are closely aligned with the overall risk management framework of the Sarbanes Oxley Act of 2002. Any material risks (whether internal or external) identified by the Group's internal controls are escalated to, and considered by, the Joint Administrators or the respective Boards of Directors.

The Group is committed to sound principles of corporate governance to enhance the long-term value of the Group for the benefit of its stakeholders. The Group believes that the long-term interests of its stakeholders are advanced by responsibly addressing the concerns of stakeholders and interested parties. The Group acknowledges that one of the key stakeholder groups are the tax authorities in the jurisdictions where the Group operates.

The Group maintains high ethical standards and conducts its business with integrity. The Group's values of Integrity, Zero harm, Teamwork, Innovation and Performance are reflected in its Business Conduct Guidelines which all associates are expected to uphold. The Guidelines go to the very core of the Group's culture and corporate identity and reaffirms the Group's commitment to do the right thing and act with integrity, transparency, and honesty in all circumstances.

Tax contributions of the Group cover corporate taxes, employment taxes, customs duties, property taxes and VAT (and other sales-based taxes).

#### **The Group's attitude towards tax planning**

The Group organises its affairs to be compliant with all applicable UK laws including those pertaining to taxation. The Group does not engage in artificial tax arrangements for the purpose of reducing tax. Intragroup transactions are conducted on an arm's-length basis and comply with transfer pricing rules in the jurisdictions where the Group operates.

#### **The level of risk in relation to UK taxation that the Group is prepared to accept**

The Group structures transactions consistently with the underlying commercial reality based on sound principles with a desire to achieve certainty in the Group's tax affairs.

#### **The Group's approach towards dealings with HMRC**

It is the Group's practice to be open and transparent with HMRC. The Group is committed to promptly disclose material matters to HMRC and to openly discuss issues where the law may be new or where differing interpretations may be apparent.