



Kellogg's Tax Policy & Objectives

- Our mission is to ensure compliance with all applicable tax laws and obligations, as well as the spirit of those laws, in respect of all direct and indirect taxes, in all of the countries in which we operate.
- Kellogg Company's Global Code of Ethics shapes our tax policy and objectives. The tax policy and objectives are governed by the reporting & control framework set down by Kellogg Company's Board of Directors and its Committees. Day-to-day management of our tax affairs is delegated to our VP, Corporate Taxes who reports to the Company's Chief Financial Officer. As part of this process, the tax policy and objectives are reviewed annually to ensure that any emerging tax risks and changes to tax laws are addressed.
- We pay the correct amount of taxes locally in each country in which we operate, reflecting the actual economic and legal activities taking place there and the value created in the normal course of business. We work to ensure timely and accurate tax payments to all relevant tax authorities. We do not pay taxes that are not legally due or that are claimed on an unprincipled or unjustified basis. We act in accordance with the applicable tax regulations and are guided by relevant international standards. This includes acting in accordance with the arm's length principle in relation to transfer pricing, in line with the OECD's standard. The arm's length nature of our transactions is documented contemporaneously.
- Substantial changes to tax laws have taken place in recent years, including OECD BEPS, EU tax directives, and US tax reform. We continuously monitor changes in the tax environment, ensuring that we act upon changes in an effective and timely manner.
- We approach tax risks with consideration of the regulatory environment and take into account our own operational and economic factors. We do not take tax positions that are not defensible under full disclosure. We do not engage in tax evasion, artificial, or high-risk transactions and we do not use tax structures without commercial substance.
- We seek to build, develop and maintain positive relationships with tax authorities and their respective governments. We adopt a cooperative and transparent approach with these tax authorities and, when necessary, engage in appropriate dispute resolution procedures.
- Where jurisdictions tax authorities provide appropriate mechanisms to obtain advance clearance in respect of the tax impact of major transactions, we may opt to obtain such clearances. We are under the Compliance Assurance Program (CAP) with the IRS. This involves working collaboratively and transparently with the IRS to identify and resolve potential tax issues before we file our tax return each year. We also engage with governments on proposed developments in tax legislation and regulation when appropriate, either directly or through representative bodies.
- We continually strive to improve the efficiency of our Tax function and to develop our people to ensure that we have appropriately skilled personnel with the resources, up-to-date expertise, training and systems to perform their roles. On a wider company basis, we also seek to develop tax awareness across our functions and businesses.
- Protecting the interests of our shareholders, employees, consumers, customers, authorities and the communities where we operate are key objectives underpinning our approach to Tax. We are committed to safeguarding the reputation of the Company in a transparent manner.

Kellogg Company intends this statement to satisfy any statutory responsibilities it may have to disclose its approach to the management of taxes. In particular, this statement complies with the UK disclosure requirement under Schedule 19 of the UK 2016 Finance Act and relates to the financial year ended 30 December 2023.