

Solventum UK Holding Company - Tax Strategy

In compliance with Section 161 and Section 19(2) of Schedule 19 to the Finance Act 2016, Solventum UK Holding Company Limited is pleased to publish this Tax Strategy for the year ended 31 December 2024.

References to 'UK Taxation' are to the taxes and duties set out in paragraph 15(1) of the Schedule, which include Income Tax, Corporation Tax, PAYE, NIC, VAT, Insurance Premium Tax, and Stamp Duty Land Tax. References to 'tax', 'taxes', or 'taxation' are to UK taxation and to all corresponding worldwide taxes and similar duties in respect of which Solventum UK has legal responsibilities.

References to Solventum are to Solventum Corporation. References to Solventum UK are to Solventum UK Holding Company Limited and its UK affiliates.

This UK Tax Strategy has been approved by the Board of Solventum UK Holding Company Limited.

About Solventum

Solventum is a leading global healthcare company developing, manufacturing, and commercializing a broad portfolio of solutions that leverages deep material science, data science, and digital capabilities to address critical customer and patient needs. We constantly seek to enable the improvement of standards of care and move healthcare forward with innovation powered by insights, clinical intelligence, technology, and manufacturing expertise. Our 70+ year history of discovering and innovating advanced solutions has helped us solve our customers' toughest challenges. With \$8 billion USD in sales, our circa 20,000 employees connect with customers all around the world.

Solventum UK has significant presence for Solventum Group, with multiple locations in the UK including an R&D facility and service and repair centre. We provide jobs for almost 500 people, bringing expertise in 4 different business segments:

MedSurg is a provider of solutions including negative pressure wound therapy, advanced wound dressings, advanced skin care, I.V. site management, sterilization assurance, temperature management, surgical supplies, medical tapes and wraps, stethoscopes, medical electrodes, and medical technologies

Dental Solutions is a provider of a comprehensive suite of dental and orthodontic products including brackets, aligners, restorative cements, and bonding agents that span the "life of the tooth," including products designed for preventative dental care, direct and indirect restoration, and broad orthodontic needs.

Health Information Systems provides healthcare systems with software solutions – including computer-assisted physician documentation, direct-to-bill and coding automation, classification methodologies, speech recognition, and data visualization platforms – that are designed to eliminate revenue cycle waste, create more time for patient care, and support value-based care.

Purification and Filtration is a provider of purification and filtration technologies including filters, purifiers, cartridges, and membranes.

Solventum UK's Approach to Taxation

Solventum UK is committed to complying with all applicable tax laws, rules, regulations, reporting and disclosure requirements through the implementation of standardised, simplified, cost-effective and automated compliance processes. This means paying the right amount of tax in the right place at the right time and involves disclosing all relevant facts and circumstances to the tax authorities and claiming reliefs, incentives and exemptions in line with and in the spirit of the applicable tax legislation.

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In addition, Solventum's UK Tax Strategy is consistent with our values set forth in Solventum's Code of Conduct:

<https://www.solventum.com/en-ie/home/our-company/ethics-compliance/#code-conduct>

- Put people first - We value our team members first and foremost and then extend this empathy and respect to the world around us. This creates positive change for our stakeholders, and most importantly, the people and patients our innovations help every day.
- Win with excellence - We set high standards for ourselves and work hard to exceed them. By bringing quality, reliability and integrity to the way we work, we ensure patient safety and compliance while achieving exceptional results for the people we serve.
- Solve what matters - Fuelled by bold ambition and unique capabilities, we push ourselves to think in different ways, to learn and listen closely to what our customers need most. With this clear focus we create innovative solutions that shape the future of health
- Advance together - We act swiftly and skilfully as one team, collaborating across the organization to anticipate and create solutions that meet our customers' most important needs.
- Live with heart - We believe in changing the world for the better. Driven by a desire to make an impact on the countless lives, we look for opportunities to bring our kindness, talent and expertise to serve our communities and those in need.

Our success depends on our integrity and embracing personal responsibility to speak up where something may not be quite right.

Solventum UK group approach to risk management and governance arrangements in relation to UK taxation

At the highest level, responsibility for taxes resides with Solventum's Senior Vice President, Tax. The Senior Vice President, Tax reports to Solventum's Executive Vice President and Chief Financial Officer and is a member of Solventum's Financial Leadership Team. The Senior Vice President, Tax has oversight over the material tax matters of Solventum's worldwide business and supply chain.

In the UK, Solventum UK ensures the appropriateness of its accounting and tax records on an ongoing basis to enable us to meet our compliance obligations. We document and confirm this to His Majesty's Revenue and Customs (HMRC) annually in accordance with the Senior Accounting Officer (SAO) regime.

Day-to-day management of Solventum UK's taxes are delegated to the EMEA Tax Leader and UK Indirect Tax Analyst. Processes relating to various taxes are allocated to the relevant process owners responsible for executing tax compliance controls. Appropriate training is carried out for staff who manage or process matters that have tax implications.

Attitude of the group to tax planning (so far as affecting UK taxation)

Solventum UK engages in tax planning that is aligned with its commercial business activities or supply chain needs, and in compliance with UK tax rules and regulations may engage in tax planning or other activities potentially perceived as tax planning. We do not engage in artificial tax arrangements that lack economic substance, one of the main purposes of which would be to obtain a tax advantage. We may, however, evaluate potential economic options resulting from business transactions with consideration of tax efficiency.

Transactions between Solventum companies are conducted on an arms-length basis in accordance with appropriate OECD transfer pricing rules. This ensures the group's profits are taxed where economic activities are performed. Solventum UK supports international transparency on taxation matters, including OECD measures on Country-by-Country Reporting (which it undertakes as part of a relevant group) and the

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Automatic Exchange of Information global standard. The group also complies with cross-border tax avoidance arrangement disclosure rules (known as the mandatory disclosure rules, or MDR).

Where there are any areas of uncertainty, Solventum UK engages its external professional advisors to provide specialist advice as and when needed.

Level of risk in relation to UK taxation that the group is prepared to accept

Our approach to tax risk follows the commercial principles that apply to our management of legal, compliance, and other business risks. Our internal framework operates to support compliance with tax laws and regulations in the UK and to ensure we identify, assess and mitigate tax risks.

Approach toward dealings with HMRC

We strive to have an open, honest and collaborative working relationship with HMRC.

When submitting tax computations and returns to HMRC, Solventum UK discloses all relevant facts and identifies any transactions or issues where it considers that there is potential for the tax treatment to be uncertain. We recognise that there could be areas of differing legal interpretations between us and HMRC, and where appropriate we will engage in proactive discussion to bring matters to as rapid a conclusion as possible.

Any inadvertent errors in submission of tax returns and tax computations to HMRC are fully disclosed as soon as reasonably practicable after they have been identified.

We engage with HMRC and relevant international governments on proposed changes to tax legislation where appropriate, either directly or via representative bodies.

This tax strategy is updated annually for publication on our website.