

2018 UK Tax Strategy Statement – FMC Chemicals Limited

Overview

This publication sets out the UK tax strategy for FMC Chemicals Ltd. as required by the UK legislation set out in schedule 19 of Finance Act 2016. Livent Corporation – the ultimate parent (based in the US) understands the importance of complying with local tax laws around the world in the most tax efficient way possible.

Approach to Risk Management and Governance Arrangements

Our goal is to adhere to a low tolerance for tax risk. All significant tax planning and compliance positions are vetted out with internal senior management as well as outside legal, audit, and tax professionals where applicable to ensure that tax risks are minimized.

After implementation, we have a practice of monitoring changes in tax law to ensure that positions we have taken are still in compliance.

We have an established tax accounting and compliance procedure that our local finance professionals as well as outside tax advisors (where applicable) follow. This is reviewed and approved by senior management to ensure that Livent maintains the integrity of the various tax filings and any other tax compliance requirements. The focus is to identify, measure, and manage the amount of risk that Livent takes on all positions taken.

Attitude towards Tax Planning

Our tax planning strategies support business objectives while keeping local tax compliance in mind.

Our intercompany transactions are established based on an arm's length principle and adhere to the transfer pricing rules and regulations promulgated under the OECD's transfer pricing guidelines for multinational entities as well as the U.S. Treasury Section 482.

Attitude towards Risk

Our policies and practice adhere to a low tolerance towards risk. This is to ensure that we maintain compliance with local tax laws and regulations in every jurisdiction from which we conduct business activities.

Relationship with HM Revenue & Customs (HMRC)

FMC Chemicals Ltd. has worked with the HMRC in the past and will continue to do so in the future with regards to timely tax filings and various disclosure requirements where applicable.

This tax strategy applies to FMC Chemicals Ltd. in compliance with Schedule 19, Finance Act 2016 and has been approved by Marina Zivik as Chief Tax Officer for the year ending 31 December 2019

About Livent

For more than six decades, Livent has partnered with its customers to safely and sustainably use lithium to power the world. Livent is one of only a small number of companies with the capability, reputation, and know-how to produce high-quality finished lithium compounds that are helping meet the growing demand for lithium. The company has one of the broadest product portfolios in the industry, powering demand for green energy, modern mobility, the mobile economy, and specialized innovations, including light alloys and lubricants. Livent employs approximately 800 people throughout the world and operates manufacturing sites in the United States, England, India, China and Argentina. For more information, visit livent.com.