



## **Kellanova's Global Tax Policy**

**Mission Statement:** 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 every country where we operate.

**Governance and Management:** Kellanova's Global Code of Ethics shapes our tax policy. The policy is governed by the reporting and control framework established by Kellanova's Board of Directors and its Committees. Day-to-day management of our tax affairs is delegated to our VP of Corporate Taxes, who reports to Kellanova's Chief Financial Officer. The global tax policy is reviewed annually to address emerging tax risks and changes in tax laws.

**Tax Compliance:** Kellanova is committed to complying with all applicable tax regulations and international standards, including the arm's length principle for transfer pricing, in line with OECD standards. We document the arm's length nature of our transactions contemporaneously. We continuously monitor changes in the tax environment, including OECD initiatives, EU tax directives, and U.S. legislation, ensuring timely and effective responses to these changes.

**Tax Payments:** Kellanova pays the correct amount of taxes in each country it operates, reflecting the actual economic and legal activities of the business. Kellanova ensures tax payments are timely and accurate to all relevant tax authorities and does not pay taxes that are not legally due.

**Risk Management:** When evaluating tax risks, Kellanova considers the legislative and regulatory environment, as well as operational and economic factors. We do not take tax positions contrary to the law, engage in tax evasion, or participate in artificial or high-risk transactions. We seek external tax advice for complex and significant tax issues.

**Relationships with Tax Authorities:** Kellanova aims to build and maintain positive relationships with tax authorities and governments by adopting a cooperative and transparent approach. We engage in appropriate dispute resolution procedures when necessary and may seek advance clearance for major transactions where mechanisms are available. In the U.S., Kellanova participates in the Compliance Assurance Program, working collaboratively and transparently with U.S. tax authorities to identify and resolve potential tax issues before filing our tax return each year.

**Engagement with Governments:** Kellanova engages with governments on proposed tax legislation and regulation developments, either directly or through representative bodies.

**Continuous Improvement:** Kellanova strives to improve the efficiency of the tax function and develop a team through training and maintaining appropriate licenses. Our tax team is comprised of qualified and experienced professionals.

**Commitment to Stakeholders:** Protecting the interests of our shareholders, employees, consumers, customers, authorities, and communities is a key objective underpinning our approach to tax. We are committed to safeguarding Kellanova's reputation in a transparent manner.

This statement is intended to satisfy any statutory responsibilities Kellanova may have to disclose its approach to managing global taxes. In particular, it is intended to comply with the UK disclosure requirement provided in Schedule 19 of the UK 2016 Finance Act and relates to the financial year ending December 28, 2024.