



COUNTRY BY COUNTRY REPORT 2023

CIE Automotive maintains its commitment to **transparency** through the preparation, since 2015, of the **Country by Country Report**



Since 2013, more than 140 countries have been working together within the OECD Inclusive Framework, in order to implement actions to address tax evasion, improve the coherence of international tax rules and ensure a more transparent tax environment.



The Action Plan against Base Erosion and Profit Shifting, known by its acronym in English BEPS, is an OECD project that highlights the importance of integrating tax international policies referring to tax planning strategies used by international groups that take advantage of mismatches in tax rules to avoid paying taxes. One of the measures resulting from this work or **BEPS Action Plan** was the **Country by Country Report**.



The **Country by Country Report** requires multinationals to provide financial and tax information in relation to their Income Tax at country level, as well as the identification of the entities that make up the Group and their main activities.

2. LOCATION OF CIE PRODUCTIVE ACTIVITIES

CIE Automotive group's operating structure

1. UNITED STATES I+D

- CIE USA
- CIE Newcor RGI Clifford
- CIE Newcor MTG
- CIE Somaschini North America
- Golde Auburn Hills

2. MEXICO I+D

- CIE Amaya Mex
- CIE Celaya (multitec.)
- CIE Matic
- CIE Nugar
- CIE PEMSA Celaya
- CIE Plásticos México
- CIE PEMSA Saltillo
- CIE Forjas de Celaya
- Bill Forge de México
- Golde Puebla
- CIE Mapremex

3. BRAZIL I+D

- CIE Autoforjas
- CIE Autometal SBC
- CIE Dias D'Ávila
- CIE Autocom
- CIE Jardim Sistemas
- CIE Nakayone
- CIE Durametal
- CIE Taubaté
- CIE Autometal Diadema (multitec.)
- CIE Autometal Pernambuco
- CIE Autometal Minas
- CIE Autometal Salto
- CIE Autometal Pernambuco II

4. SPAIN I+D

- CIE Alcasting
- CIE Amaya
- CIE Denat
- CIE Egaña
- CIE Galfor
- CIE Gameko
- CIE Inyectametal
- CIE Legazpi
- CIE Mecasur
- CIE Mecauto
- CIE Norma
- CIE Nova Recycl
- CIE Orbelan
- CIE Recycle
- CIE Recylan
- CIE Recytec
- CIE Udalbide
- CIE Vilanova
- ACS Ibérica

5. PORTUGAL I+D

- CIE Stratis
- CIE Plasfil

6. FRANCE I+D

- CIE Compiègne
- ACS France

7. ITALY

- Metalcastello Spa
- CIE Somaschini
- CIE Somaschini Automotive

8. MOROCCO

- CIE Maroc

9. GERMANY I+D

10. HUNGARY

- CIE Salgglas

11. LITHUANIA

- CIE LT Forge

12. CZECH REPUBLIC

- CIE Zdanice
- CIE Metal CZ
- CIE Plasty
- CIE Unitools Press
- CIE Praga Louny

13. SLOVAKIA I+D

- CIE Mar SK
- Golde Lozorno

14. ROMANIA

- CIE Matricon
- ACS Romania
- Golde Oradea

15. RUSSIA

- CIE RUS

16. CHINA I+D

- CIE Automotive Parts Shanghai (multitec.)
- Nanjing Automotive Forging
- ACS Shanghai
- ACS Wuhan
- Golde Changchun
- Golde Shanghai
- Golde Tianjin
- Golde Wuhan
- Golde Shandong
- SAMAP Ningde
- SAMAP Shanghai

17. INDIA I+D

- CIE India Forgings Pune
- CIE India Gears Pune
- CIE India Gears Rajkot
- CIE India Stampings Rudrapur
- CIE India Stampings Nashik
- CIE India Stampings Kanhe
- CIE India Stampings Kanhe II
- CIE India Stampings Zaheerabad
- CIE India Stampings Pantnagar
- CIE India Stampings Nagpur
- CIE India Composites Division
- CIE India Foundry Division
- CIE India Magnetic Products Division
- Bill Forge Bommasandra
- Bill Forge Jigani (Plant 2)
- Bill Forge Attibele
- Bill Forge Coimbatore
- Bill Forge Haridwar
- Bill Forge Jigani (Plant 6)
- CIE Aluminium Casting Aurangabad HPDC
- CIE Aluminium Casting Aurangabad GDC
- CIE Aluminium Casting Pantnagar
- CIE Aluminium Casting Pune
- CIE Hosur
- Golde Pune

Refer to the Appendix to the consolidated annual financial statements for more information about the corporate structure.

Country-by-Country Report Definitions

Scope and list of constituent entities and their main activities

CIE Automotive is present in 23 tax jurisdictions through nearly 140 corporate enterprises. The country-by-country (CbC) report presents aggregate data for the entities that are fully consolidated (i.e., it does not provide information about investments in joint arrangements or associates).

Virtually all of the CIE Automotive companies carry out activities in different areas of the automotive sector, ranging from the design and manufacture of parts to their sale and distribution to TIER 1 suppliers.

The list of subsidiaries, joint arrangements and associates, along with salient information about their activities and registered offices, are provided as an Appendix to the Consolidated Annual Accounts.

Data source

The information used to prepare the CbC report was drawn from the same source as the annual Consolidated Annual Accounts of the CIE Automotive Group, i.e., the separate 2023 financial statements of each of the companies comprising the Group, prepared under International Financial Reporting Standards (IFRS).

Revenues

Revenues are split into two columns:

- The revenues received from related parties that fall under the scope of the CbC report but belong to different jurisdictions than that shown, i.e., revenues within a given jurisdiction are eliminated.
- Revenues received from third parties. Third parties include associates and joint arrangements.

This item includes, in addition to sales revenue, operating income and financial income, and, so long as net positive, gains derived from the remeasurement of financial instruments at fair value and exchange gains.

Income tax paid

Following the OECD's approach, income tax paid is presented on a cash basis and therefore includes any taxes reimbursed, payments under assessments, settlements as a result of lawsuits and withholdings. In several of the CIE Automotive Group's tax jurisdictions, the amount of tax paid refers to prior years and, therefore, differs from the tax accrued in the current year.

Income tax accrued

Again following the OECD's approach, this item includes the current and deferred tax accrued by each of the companies as per their financial statements, prepared in accordance with IFRS. Current tax expense only reflects the activities for the current year, and so excludes deferred taxes and provisions for uncertain tax liabilities.

Stated capital and accumulated earnings

Stated capital is gleaned from the share capital as per the separate financial statements under IFRS used to prepare the Consolidated Annual Accounts of the CIE Automotive Group, translated into euros at the historical exchange rate.

Accumulated earnings comprise the legal reserve, other reserves and retained earnings on that same basis.

Employees

The report provides the average headcount at year-end for 2023, following IFRS criteria.

Tangible assets

This is the sum of fixed assets recognised within property, plant and equipment and inventories.

Tax jurisdiction	REVENUE THIRDPARTY	REVENUE RELATED PARTY	TOTAL REVENUES	Pre-tax profit	Corporate Income tax Paid	Accrued Corporate Income tax (*)	Share capital declared	Retained Earnings	Average number of employees	Tangible assets excluding cash and cash equivalents
GERMANY	150	28	178	50	1	7	5	-46	454	2
BARBADOS	0	0	0	0	0	0	0	0	0	0
BRAZIL	390	0	390	68	5	15	381	400	3,286	189
CZECH REPUBLIC	130	7	137	6	1	2	49	17	560	75
CHINA	325	16	341	51	11	8	42	228	1,414	105
SLOVAKIA	155	1	157	8	0	2	0	-40	523	36
SPAIN	797	115	913	53	8	20	737	719	2,353	403
FRANCE	108	4	112	6	2	1	3	45	276	33
GUATEMALA	0	0	0	0	0	0	0	0	0	0
NETHERLANDS	0	1	1	0	0	0	0	42	4	0
INDIA	664	5	668	86	21	21	68	334	7,549	272
ITALY	141	1	141	19	6	3	15	24	421	85
SOUTH KOREA	12	0	12	0	0	0	0	0	5	0
LITHUANIA	58	0	58	8	1	1	7	12	225	30
MOROCCO	5	0	5	0	0	0	4	0	63	3
MEXICO	888	14	902	102	25	25	425	607	5,731	486
PORTUGAL	21	3	25	1	0	0	5	10	273	12
ROMANIA	92	10	102	9	1	2	6	34	587	40
RUSSIA	2	0	2	1	0	0	2	-2	38	0
HUNGARY	10	2	12	2	0	0	1	-7	131	8
UK	1	0	1	1	0	0	0	0	0	0
USA	391	1	391	7	0	-3	160	170	1,632	173
TOTAL	4,340	208	4,548	478	82	104	1,910	2,547	25,525	1,952

The data in the table above relate to 2023 and will be presented to the tax authorities on Form 231. These figures are subject to change in the event that the OECD publishes new guidelines or recommendations regarding country-by-country reporting subsequent to publication of this report but before the deadline for submitting the above Form to the Spanish tax authorities.

Refer to the Section "Elaboration Criteria" for a synopsis of the definitions and considerations used in preparing CIE's Country-by-Country Report.

(*) Tax accrued by legally incorporated entities in each jurisdiction, excluding uncertain tax positions.

