

Global Tax Contribution Report 2025

CIE Automotive



CEO's
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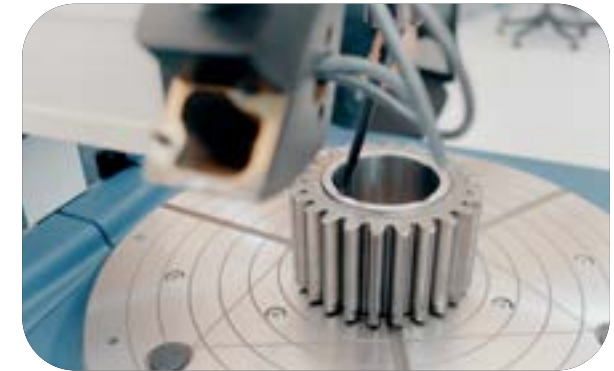
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CEO's statement

Dear reader,

2025 marked a new milestone in CIE Automotive's trajectory. We successfully completed the strategic cycle initiated in 2021, widely surpassing the targets set and reinforcing our model of sustainable and profitable growth.

In a global environment that demands responsibility and social commitment, CIE Automotive once again demonstrated its ability to generate economic and social value over the long term. Our tax contribution is one of the more tangible expressions of this commitment: tax is not only a legal obligation but also a means of directly helping to finance public services and contribute to progress in our business communities.

In 2025, our **tax contribution was our highest ever**, at €516 million in total. These figures reflect not only the magnitude of our contribution, but also CIE Automotive's ability to adapt to a constantly evolving tax environment.

Full application of the OECD's Pillar Two Model Rules, the update of our internal procedures and the upgrade of our tax risk control and management systems further refined a model that is mature, consistent and ready to tackle new challenges.

We approach taxation as an essential component of corporate sustainability. Each step forward in transparency strengthens our credibility vis-a-vis our stakeholders and confirms that we are on the right track.

This new edition of our **Tax Contribution Report** once again underlines the fact that responsible taxation and transparency are inseparable pillars of our strategy. This document provides a clear and accessible account of how we contribute to economic and social progress, framed by our conviction that credibility and accountability are the keys to building a fairer and more sustainable future.

I would like to thank our employees, customers, suppliers, shareholders and public authorities for their collaboration and trust, which are fundamental to making joint progress on this shared purpose.

Jesús Mª Herrera
Chief Executive Officer



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[01]

Executive summary

- About CIE Automotive
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- Milestones
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About CIE Automotive

CIE Automotive is a **leading multinational player in the automotive sector**, specialised in the design, development and manufacture of parts and subassemblies for the main original equipment makers (OEMs) and their tier-1 suppliers.

Our business model combines a range of productive technologies (forging, casting, machining, plastic, stamping, composites and electrical components), allowing us to offer end-to-end solutions, from structural parts to advanced vehicle electrification and digitalisation systems.

Founded in 1996, the Group has evolved continuously to become a key strategic partner in the global mobility value chain, thanks to its **technological diversification, international presence and unwavering commitment to innovation and sustainability**.

With operations in **19 countries**, more than **130 corporate enterprises** and a team of over **25,000 professionals**, CIE Automotive serves a combination of mature and emerging markets, striking a geographical balance that mitigates risks and multiplies opportunities.

Financially, **CIE Automotive boasts a long-standing record of solidity**. In 2025, our sales revenue topped €3,958 million and our net profit amounted to €336 million, further evidence of our robust, profitable and resilient model in the face of structural sector changes.

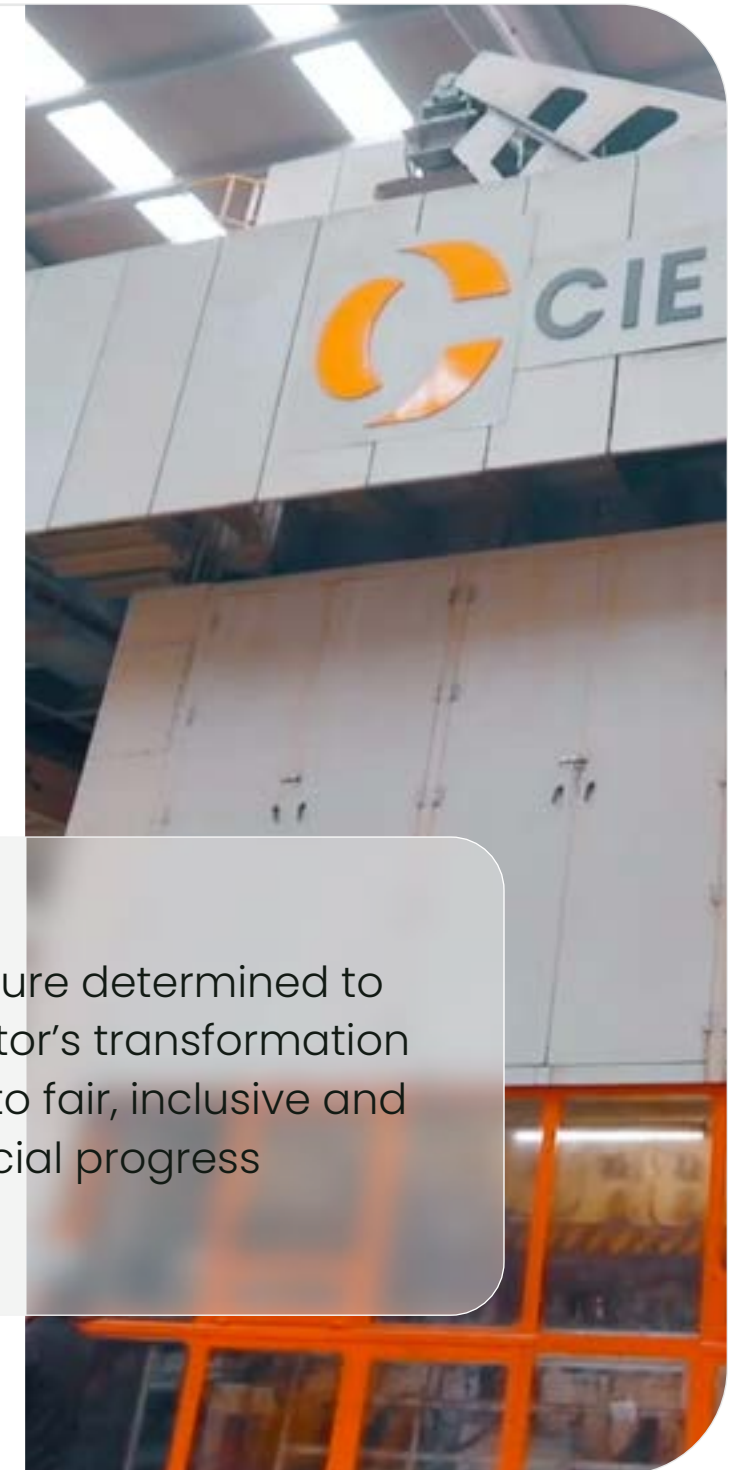
Sustainability is the central axis of our strategy. We embed environmental, social and governance criteria into our daily operations and our industrial and financial decisions and we are shaping more

efficient and environmentally-friendly mobility. Our efforts range from emissions abatement and energy efficiency at our factories to investment in career development, the promotion of equal opportunities and support for our local communities.

Framed by our long-term vision, we continue to reinforce our global footprint, invest in technology and digitalisation, foster strategic partnerships and nurture a culture articulated around transparency, integrity and the creation of shared value.

In sum, CIE Automotive looks to the future determined to remain a key player in the sector's transformation and make a real contribution to **fair, inclusive and sustainable** economic and social progress.

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Tax transparency and responsibility
are essential components of how we
engage with society, institutions and the
investment community

Our vision of responsible taxation

At CIE Automotive, **tax transparency and responsibility** are essential components of how we engage with society, institutions and the investment community.

We understand that responsible taxation goes beyond regulatory compliance: it represents an **ethical and social** commitment which contributes to the collective wellbeing. Through our taxes, we finance essential public services such as education, healthcare and infrastructure and we give back to society in the form of employment, innovation and shareholder remuneration.

Tax transparency implies the provision of clear, verifiable and readily understandable information about our tax matters, giving an account of how we comply with our tax obligations and evidencing the alignment between the taxes we pay and the real activities carried out in each country.

In the long term, this approach makes us more credible, fosters economic equity and helps forge a stable business environment. To that end, CIE Automotive is voluntarily publishing this year's **Tax Contribution Report**, in which we once again rigorously update the taxes borne and collected in each of our markets.

By means of this transparency, we are earning the trust of our stakeholders and cementing a governance framework in which taxation is embedded into the Group's ESG strategy, so fostering responsible growth and fair taxation, consistent with the value created in each territory.



Milestones

2025 has been especially important for CIE Automotive in the area of taxation due to both the growth in our tax contribution and the advances made around governance, transparency and institutional cooperation.



Record tax contribution

Our total tax contribution amounted to €516 million, underpinned by our solid industrial model and balanced global footprint.



Minimum taxation

We adapt to the minimum global tax requirements. To that end, we updated our internal procedures, strengthened our control systems and applying the Model Rules, combining legal protection and reporting transparency.

Reinforcement of our international structure

We completed the liquidation of our company in Barbados, eliminating our presence in non-cooperative jurisdictions and reinforcing the alignment between our real activities and our taxes.



Strengthening of institutional cooperation

We reinforced our relationship with the Basque tax authority, participating in its so-called Joint Permanent Relations Forum and taxpayers.

Progress on international transparency

CIE Automotive continues to publish its Country-by-Country Report annually, in keeping with its obligations under Directive (EU) 2021/2101. This exercise highlights our leadership in tax reporting.



Accolades for transparency around tax

Our tireless commitment to providing high-quality and accessible tax information has once again been acknowledged by the Haz Foundation, which has renewed our **Tax Transparency Seal (★★★)**. This distinction evidences our top-scoring performance along the criteria of tax information exhaustiveness, reliability and public accessibility.





CIE Automotive in figures

KEY
INDICATORS

2025



GLOBAL PRESENCE

4 continents
19 countries
+130 companies

Diversified international network



EMPLOYEES

+25,000 employees

Commitment, talent and shared vision



NET PROFIT

≈€336M

Solid and profitable track record



REVENUE

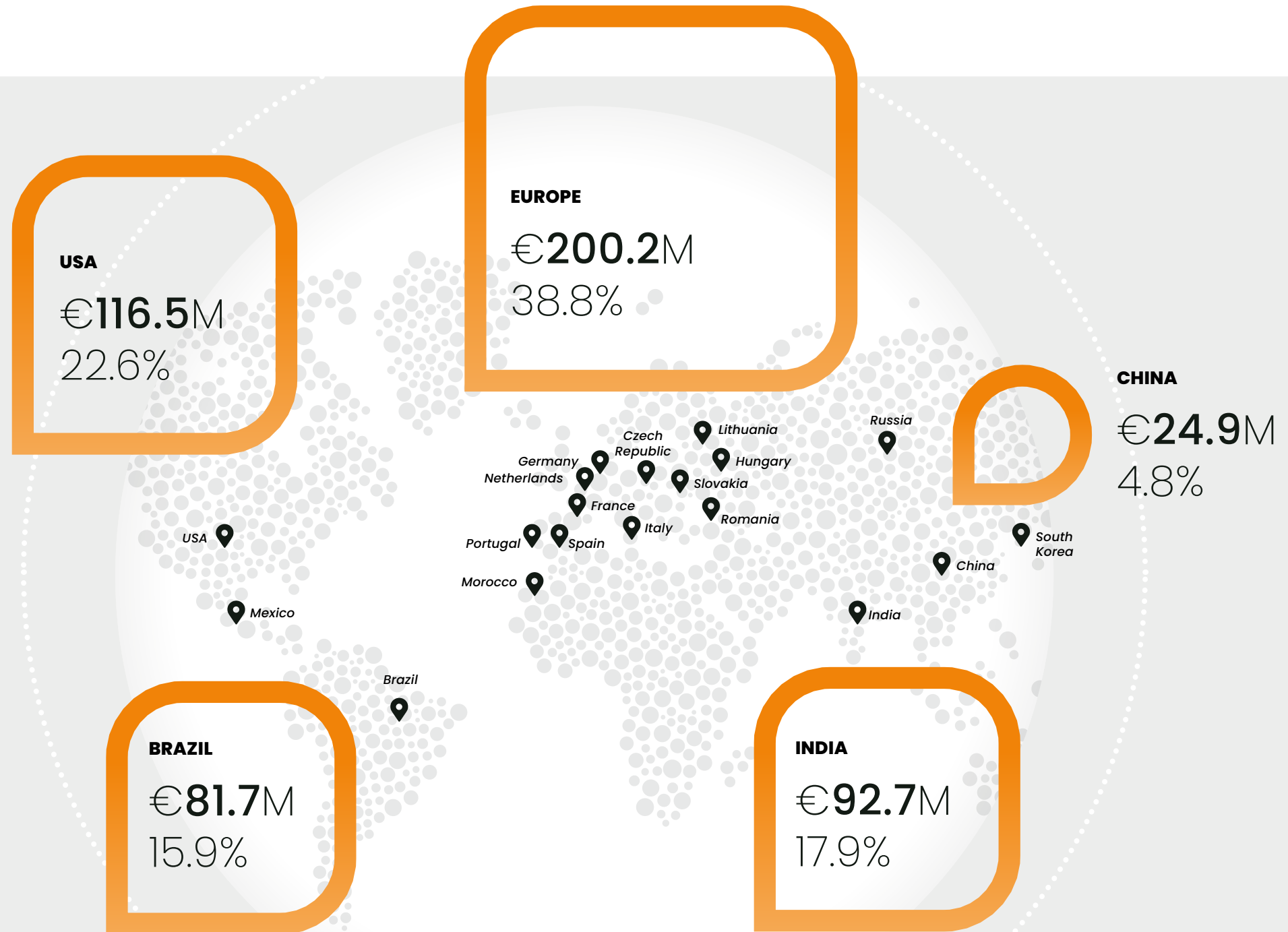
≈€3,958M

Sustained and consistent support from our business



SOLID GLOBAL FOOTPRINT

CIE Automotive's diversified global footprint is mirrored in its tax contribution. This map provides a clear and transparent snapshot of the breakdown of the taxes borne and collected and reflects our commitment to economic and social development globally.





TAX KEY INDICATORS

TAXES BORNE

€291.3M

56.4% Direct payment

TAXES COLLECTED

€224.7M

43.6% Payment on behalf of third parties

TOTAL VALUE GENERATED

€1,206M

TOTAL TAX CONTRIBUTION

€516.0M

TAX CONTRIBUTION RATIO

60.1%

CIE Automotive's total tax contribution in 2025 is **30% higher than in 2021**, extending the trend of a contribution that is growing year after year

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Tax performance

CIE Automotive's tax performance in 2025 echoes both the solidity of the Group's industrial model and the maturity of its global tax framework. During this last year we made progress on transparency, boosted our contribution to national public finances and successfully adapted our control systems for new regulatory requirements.

- Background and methodology
- Taxes borne and collected in 2025
- Consolidated social impact
- CIE Automotive's tax contribution around the world



Background and methodology

Globally, taxation has been cementing its role as a core component of the corporate sustainability thrust. Against that backdrop, **CIE Automotive is keen to reaffirm its commitment to transparency and accountability.** We publish this account out of our conviction that taxes constitute one of the main ways in which companies can contribute to economic and social development in their local communities.

To ensure like-for-like and comparable information, we rely on the **Total Tax Contribution (TTC)** methodology described in appendix 6.1 to draw up this report. That framework allows us to measure our real tax contribution by encompassing all of the different taxes paid and collected in the various jurisdictions where we operate, rather than just corporate income tax.

Furthermore, the TTC methodology takes on board best international practices, including the GRI 207 standard and the OECD's guidelines, and adapts over time to reflect emerging disclosure obligations. In this manner, **we get ahead of our regulatory requirements and reinforce the trust of investors, the authorities and society at large.**

Publication of this report constitutes a voluntary exercise in transparency and evidences the extent to which tax management has been embedded into CIE Automotive's corporate and sustainability strategies.

Publication of this report is a voluntary transparency measure with which we underscore that tax management is a strategic pillar of our vision for how we conduct our business globally and how we contribute to fairer and more sustainable economic development





Taxes borne and collected in 2025

In 2025, CIE Automotive's **total tax contribution (TTC)** amounted to **€516.0 million**, broken down between:

35.4% of taxes borne
20.0% of the total contribution

TOTAL
€516.0 million

TAXES BORNE

€291.3 million

INCOME TAX PAID

€103.2 million

TAXES COLLECTED

€224.7 million

CIE Automotive's TTC in 2025 can be classified into two major categories: **taxes borne** and **taxes collected**. This distinction provides the reader with a better understanding of the volume of taxes that imply a direct cost for the firm relative to those amounts that we manage on behalf of third parties.

In 2025, CIE Automotive paid **close to €1.4 million per day** to the public authorities in the jurisdictions in which it operates. Over €1.1 million were taxes other than corporate income tax, evidencing the diversity of taxes the Group contributes to



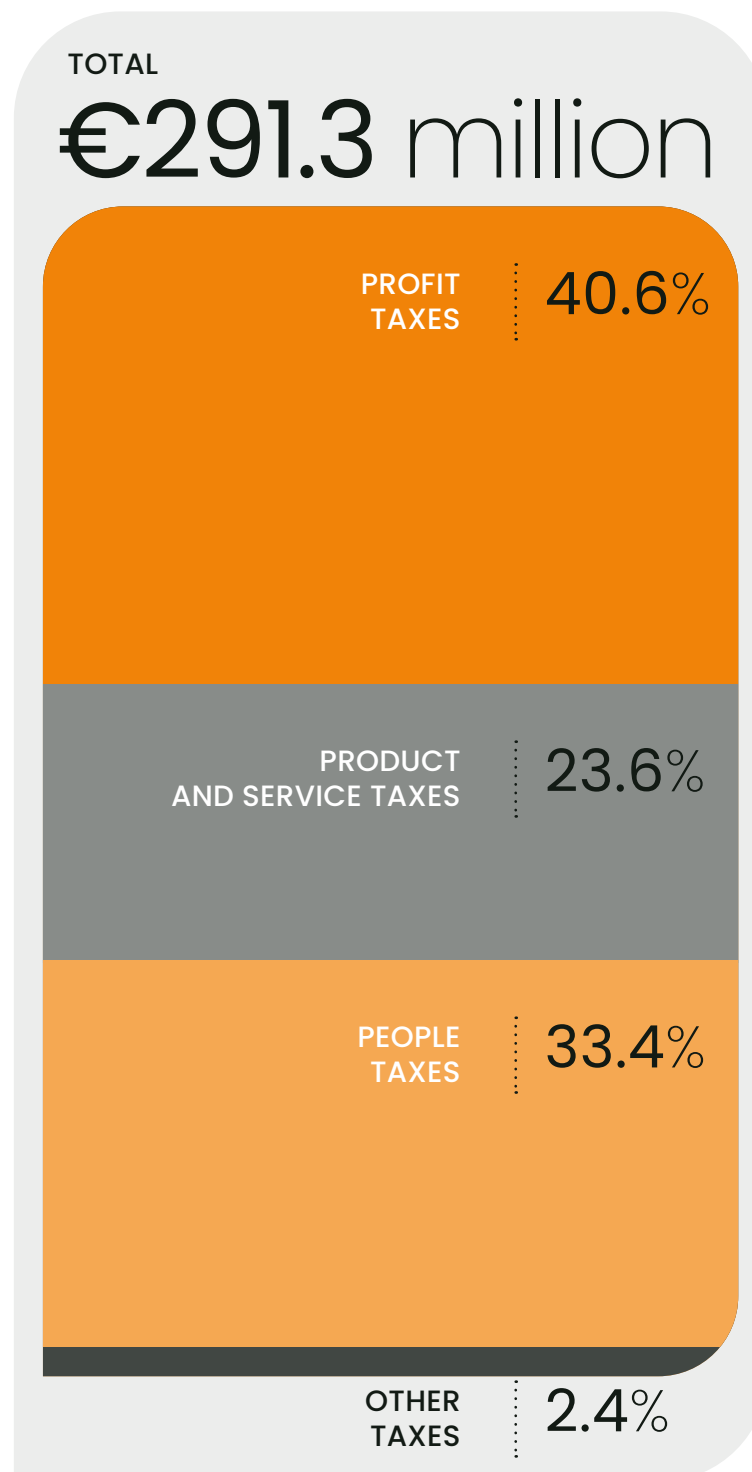


Taxes borne

These are taxes that represent a direct cost for CIE Automotive and reduce its profits. Taxes borne include:

- **Profit taxes:** like corporate income tax, which is calculated on the basis of the Group's earnings in each country.
- **People taxes:** mainly national insurance contributions borne by the employer.
- **Product and service taxes:** taxes levied on consumption and transactions that are not always reimbursable.
- **Other taxes:** these include the planet taxes and property taxes applicable in some jurisdictions.

Together, these taxes constitute the tax burden assumed by CIE Automotive directly in the course of carrying out its activities.

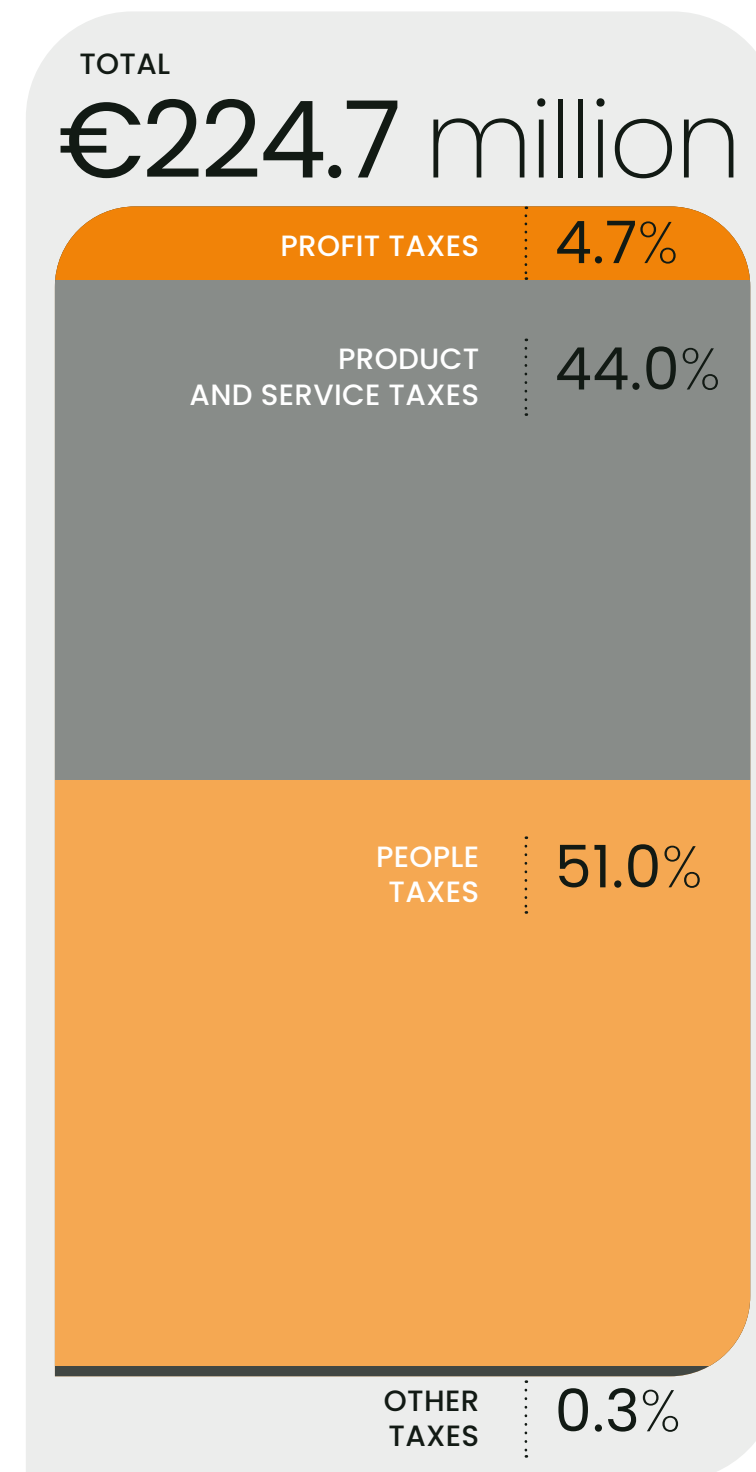


Taxes collected

These are the taxes in which CIE Automotive acts as **intermediary or withholding agent**. They do not constitute an expense for the Group as they are charged to third parties (customers, employees, suppliers and shareholders) and are transferred in their entirety to the corresponding tax authorities. This category includes:

- **Employee withholdings:** mainly from payrolls and other employee earnings.
- **Product and service taxes:** these include VAT and other indirect taxes passed through to customers.
- **Amounts withheld from suppliers, shareholders and other third parties:** as determined by the tax regulations prevailing across the various different jurisdictions.
- **Other taxes collected:** applicable in specific situations in some countries.

These taxes reflect our important role in facilitating the functioning of the national and international tax systems.





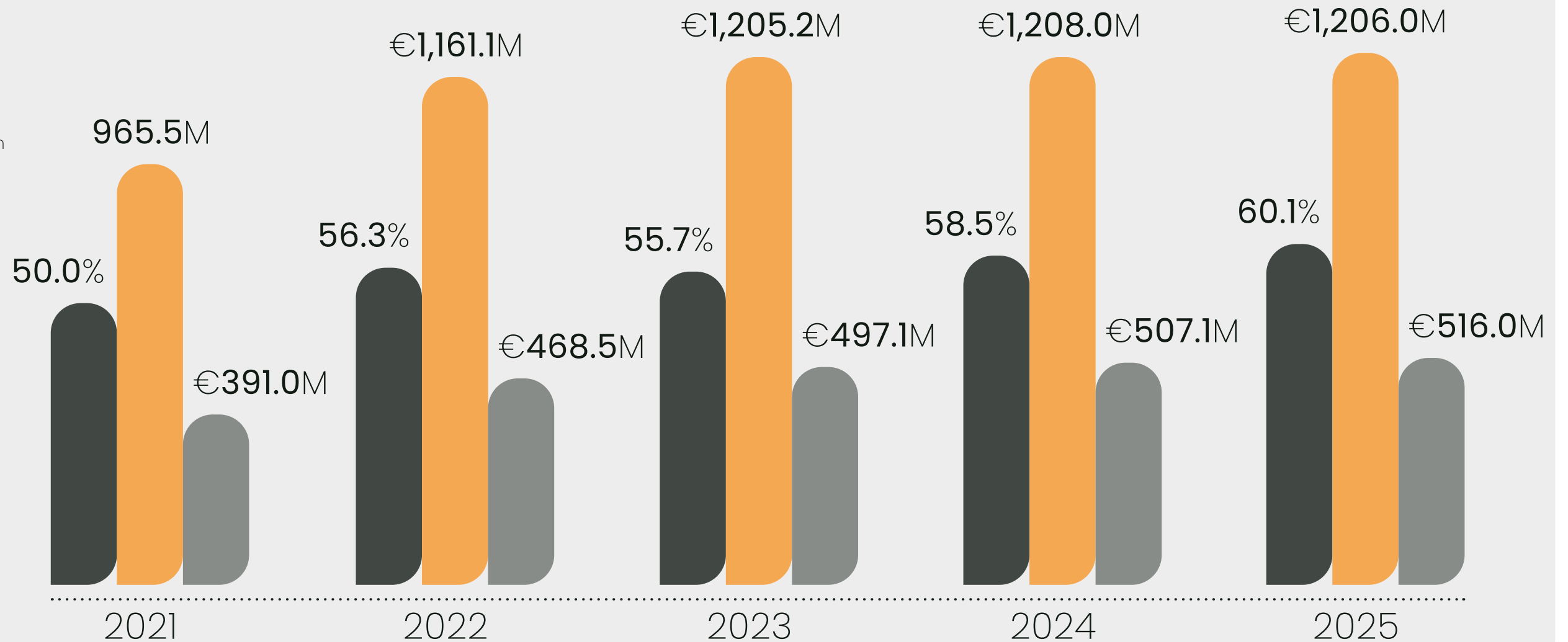
TRACK RECORD

The trend of the main indicators of tax contribution of CIE Automotive in recent years depicts a stable yet growing tax contribution.

TAX BURDEN OVER NET PROFITS

TOTAL ECONOMIC CONTRIBUTION

TOTAL TAX CONTRIBUTION



Between 2021 and 2025, our cumulative **total tax contribution** has reached **€2,380 million**, with that contribution **increasing by 1.7% in 2025**, a cumulative growth of 32.0% since 2021.

In 2025, our **Total Tax Rate (TTR)** was **60.1%**. This indicator relates the cost of all of the taxes borne, and not just corporation tax, over our worldwide earnings.

Relative to **revenue**, our **total tax burden** represented **13.0% in 2025**, in line with previous years.

Our average daily contribution to the public authorities amounted to **€1.4 million** in 2025, evidencing the regularity and continuity of the tax flows generated by the Group's activities.



Consolidated impact on society

CIE Automotive acts as an **agent of progress**, generating economic and social value in the territories where it operates. This takes the form of a business model that embeds sustainability into its economic, social and environmental dimensions and makes responsible taxation a key articulating thrust.

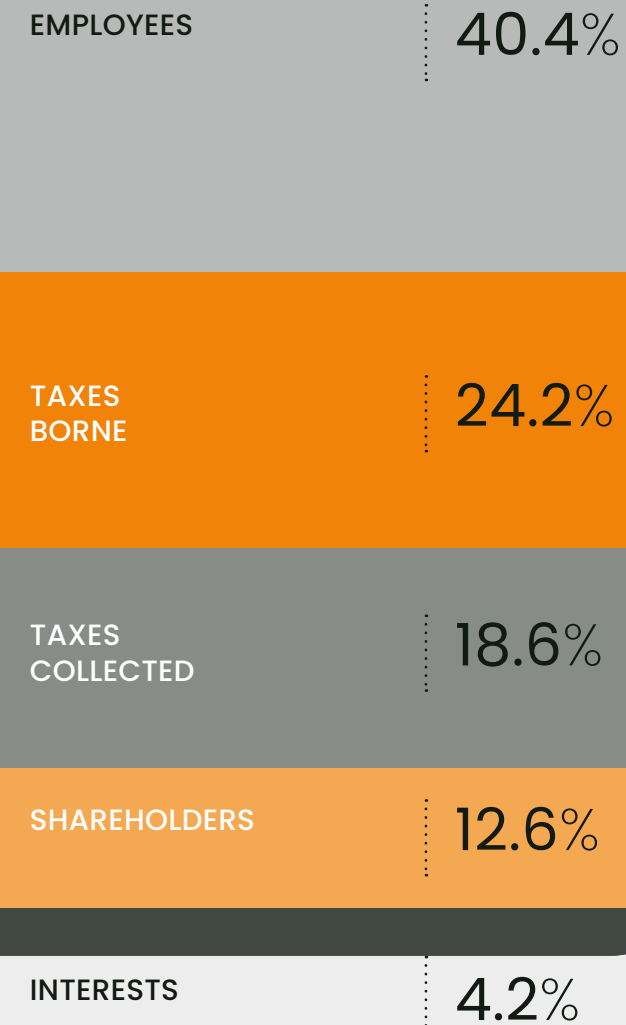
Total value distributed (social cash-flow) measures the cash that flows back to society by main stakeholder group; in addition to the taxes borne and collected by the Group, it includes the compensation paid to employees, the dividends distributed to shareholders and the interest paid to financial institutions.

In 2025, this outflow to society amounted to **€1,206 million**, evidence of our solid commitment to collective development, articulated around:

- **Employee remuneration**, highlighting CIE Automotive's role as a generator of stable and skilled work.
- **Taxes borne and collected**, helping to finance essential public goods and services across all of the jurisdictions in which we operate.
- **Dividends distributed to shareholders**, representing the return on the capital they provide us and reinforcing the credibility of our business model.
- **Interest paid to financial institutions**, reflecting our disciplined management of resources and our ties with the capital markets.

The social cash flow to society by CIE Automotive reflects the multiplier function of our industrial activity on the economy and collective wellbeing

SOCIAL CASH FLOW
€1,206.0M



TOTAL VALUE DISTRIBUTED

This indicator not only quantifies CIE Automotive's contribution, but also shows **how the value created by it gets channelled back to society at large**, serving as an economic multiplier along three dimensions:

- **Redistribution**: guaranteeing that the wealth generated reaches the various stakeholders in a balanced manner.
- **Stability**: demonstrating the regularity of the Group's contribution over time, irrespective of cyclical swings.
- **Credibility**: evidencing the transparency with which the Group accounts for where the funds it generates go.

In short, the **social cash flow to society** reflects our ability to transform our industrial activity into shared progress by placing taxation, employment and capital returns within a balanced framework which strengthens economic and social cohesion in the countries where we operate.



CIE Automotive's tax contribution around the world

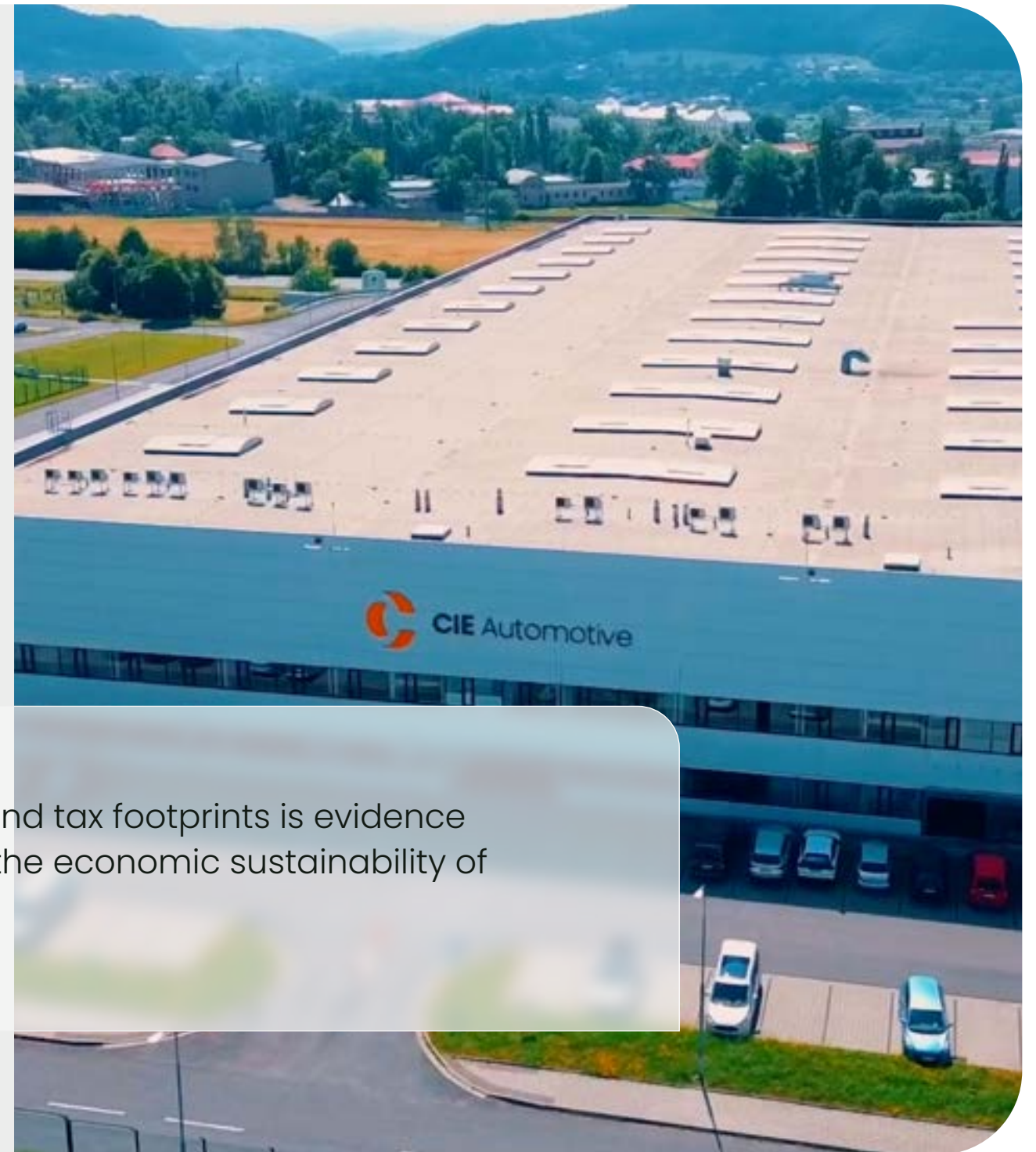
The geographic breakdown of our tax contribution mirrors the Group's global and diversified nature. With over **130 subsidiaries in 19 countries** and a manufacturing presence on four continents, CIE Automotive operates in a mix of established and emerging markets with a variety of tax systems and different levels of tax maturity.

This diversity implies a **geographical balance** between the generation and distribution of value, ensuring that we pay taxes where our actual economic activities take place.

The accompanying map illustrates this reality: the majority of our tax contribution is concentrated in our strategic manufacturing and sales regions.

Overall, this global structure is articulated around operating efficiency and **local integration** and means that we make proportionate contributions to the public finances in all of our territories.

The overlap between our industrial and tax footprints is evidence of CIE Automotive's commitment to the economic sustainability of each country in which we operate





OPERATIONAL STRUCTURE OF CIE AUTOMOTIVE GROUP

1. UNITED STATES R&D

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

2. MEXICO R&D

- CIE Amaya Mex
- CIE Celaya
- CIE Matic
- CIE Nugar
- CIE PEMSA Celaya
- CIE Plásticos México
- CIE Metal Norte
- CIE PEMSA Saltillo
- CIE Forjas de Celaya
- Bill Forge de México
- Golde Puebla
- CIE Mapremex

3. BRAZIL R&D

- CIE Forjas Minas
- CIE Autometal SBC
- CIE Dias D'Ávila
- CIE Autocom
- CIE Jardim Sistemas
- CIE Nakayone
- CIE Durametal
- CIE Taubaté
- CIE Autometal Diadema
- CIE Autometal Pernambuco I
- CIE Autometal Pernambuco II
- CIE Autometal Minas
- CIE Autometal Salto
- CIE Autometal Piracicaba
- CIE Engrecon

4. SPAIN R&D

- CIE Alcasting
- CIE Amaya
- CIE Denat
- CIE Egaña
- CIE Porriño
- CIE Galfor
- CIE Gameko
- CIE Inyectametal
- CIE Legazpi
- CIE Mecauto
- CIE Norma
- CIE Nova Recyd
- CIE Orbelan
- CIE Recyde
- CIE Recylan
- CIE Recytec
- CIE Udalbide
- CIE Vilanova
- ACS Ibérica

5. PORTUGAL R&D

- CIE Stratis
- CIE Plasfil

6. FRANCE R&D

- CIE Compiègne
- ACS France

7. ITALY

- Metalcastello Spa
- CIE Somaschini

8. MOROCCO

- CIE Maroc

9. GERMANY R&D

10. NETHERLANDS

11. HUNGARY

- CIE Salgglas

12. LITHUANIA

- CIE LT Forge

13. CZECH REPUBLIC

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

14. SLOVAKIA R&D

- CIE Mar SK
- Golde Lozorno

15. ROMANIA

- CIE Matricon
- ACS Romania
- Golde Oradea

16. RUSSIA

- CIE RUS

17. CHINA R&D

- CIE Automotive Parts Shanghai
- Nanjing Automotive Forging
- ACS Shanghai
- ACS Wuhan
- Golde Changchun
- Golde Shanghai
- Golde Tianjin
- Golde Wuhan
- Golde Shandong
- SAMAP Shanghai

18. SOUTH KOREA

- Roof Systems Korea

19. INDIA R&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 Zaheerabaad
- 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

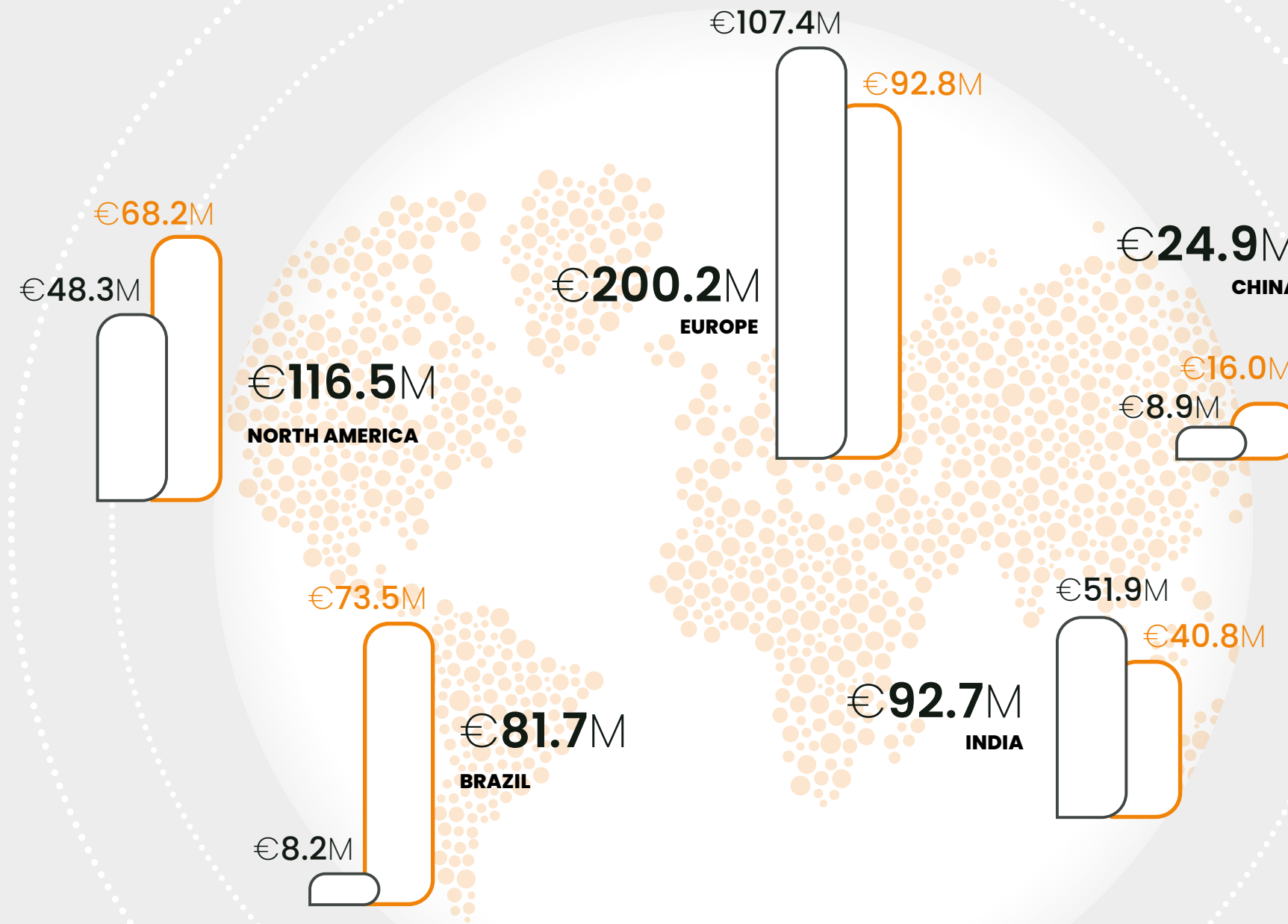


GEOGRAPHIC DISTRIBUTION OF THE TAX CONTRIBUTION IN 2025

TOTAL

- Taxes borne
- Taxes collected on behalf of third parties

TOTAL CIE AUTOMOTIVE
€516.0M





GEOGRAPHIC BREAKDOWN OF TAXES

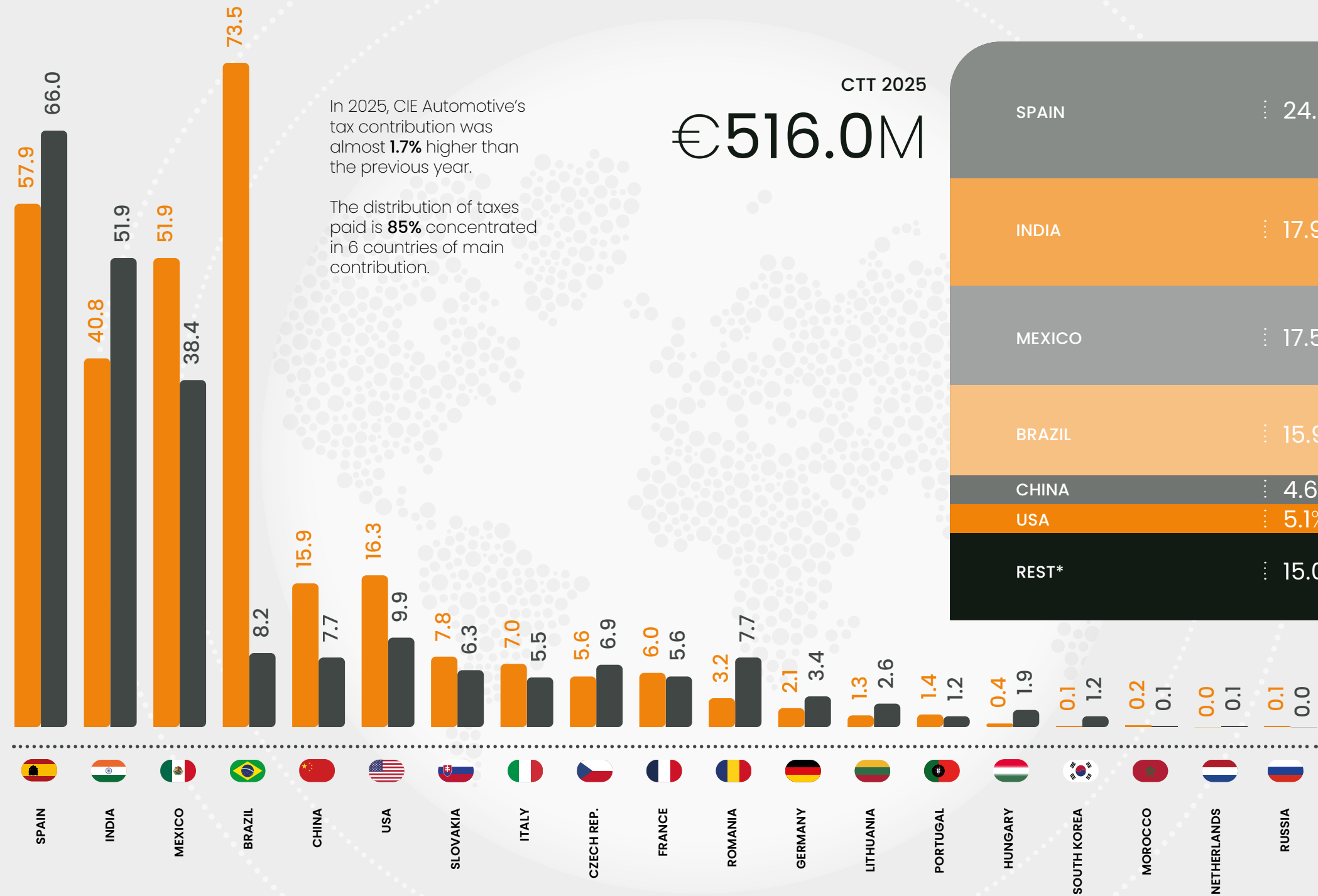
CTT 2025

€516.0M

In 2025, CIE Automotive's tax contribution was almost **1.7%** higher than the previous year.

The distribution of taxes paid is **85%** concentrated in 6 countries of main contribution.

● BORNE (PAID)
● COLLECTED (ACCRUED)



(*) Contributions less than 3%.



[03] International taxation

Transparency is a core pillar of CIE Automotive's tax strategy and a differential feature of our governance model. We view the disclosure of tax-related information not only as an exercise in responsible corporate governance but also as a key way to reinforce our credibility vis-a-vis our stakeholders and contribute to a fairer and more balanced business ecosystem.

In recent years, the international environment has been evolving in the direction of stricter reporting requirements, country-by-country disclosures, automatic information exchanges, a focus on sustainability, cross-border arrangement reporting and a shift towards digitalisation and information standardisation. CIE Automotive has been working for years to move ahead of these new requirements, voluntarily providing detailed information about the taxes it pays worldwide and implementing transparency standards that go beyond its compliance obligations.

- Country-by-Country Report
- Corporate income tax
- Global Minimum Tax
- Intragroup tax alignment



Country-by-Country Report

The **Country-by-Country Report (CbCR)** is a key tool in any tax transparency effort, allowing stakeholders to check the alignment between business activities and the taxes paid in each jurisdiction.

Championed by the OECD as part of its BEPS initiative, this report strengthens tax justice and international cooperation among authorities by offering detailed information about revenue, profits, taxes paid, employees and assets in every country where CIE Automotive operates.

The goals pursued by this reporting initiative notably include: tax transparency, fair taxation, compliance and comparability and international cooperation.

At CIE Automotive, we see the CbC Report as more than a formal obligation, we see it as a **manifestation of our commitments to integrity and clear information**. That is evident in the fact that we have been publishing it voluntarily since before it became a reporting obligation under Directive (EU) 2021/2101.

This practice reinforces CIE Automotive's position as a **benchmark in tax transparency and responsibility at the international level**.

Tax transparency.

Provides the authorities with a complete picture of reporting entities' operations by jurisdiction.



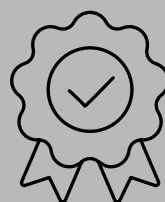
Fair taxation.

Fosters the equitable distribution of taxes by country, in line with corporate taxpayers' real business activities.



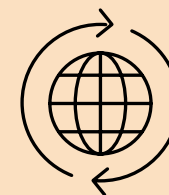
Compliance and comparability.

Facilitates auditing and mitigates the risk of aggressive tax and profit shifting practices.



International cooperation.

Promotes the exchange of information by tax authorities, bolstering trust and global oversight.



2025: A KEY YEAR FOR CBC REPORTING

2025 marked the start of a new era in the public disclosure of tax information on a country-by-country basis on the back of gradual legislative harmonisation at the European level and transposition of the new European regulations into national and regional regulations. In our tax domicile, Vizcaya, this shift has been accompanied by regional tax legislation that for years had already been requiring the preparation and communication of country-by-country information by large multinational enterprises which has recently been reinforced by the addition of new public disclosure and digital standardisation requirements.

CIE Automotive's approach has been to get well ahead of these new reporting requirements. Before public disclosure of this information became mandatory, the Group had been voluntarily and systematically reporting country-by-country tax information via its Tax Contribution Report and Non-Financial Information Statement, as well as on its corporate website. Final adaptation for the new requirements in terms of format, structure and presentation of the information therefore comes at the end of an already well-established line of initiative. CIE Automotive has the processes, systems and capabilities needed to respond rigorously to any new regulatory requirement applicable to large multinational enterprises, highlighting its entrenched commitment to compliance and transparent and responsible tax management.



2025 COUNTRY-BY-COUNTRY REPORT TABLES

The following table outlines our CbCR for 2025, aligned with the OECD’s criteria and the contents of our Spanish Tax Form 231. The figures reflect **CIE Automotive’s business activities in each jurisdiction** and evidence the alignment between the Group’s industrial footprint and the taxes paid in each territory.

To facilitate reader comprehension of the CbCR, the “Glossary of terms and definitions” appendix details the concepts and criteria used in its preparation. In addition, the “Self-assessment” appendix includes indicators designed to enable a comparable assessment of the information contained in our Form 231, using the Tax Responsibility Thermometer compiled by the Alliance for Fiscal Responsibility working group.

Tax jurisdiction	REVENUE Third Party	REVENUE Related Party	TOTAL Revenues	Pre-tax profit	Corporate Income tax Paid	Accrued Corporate Income tax (current)	Share capital declared	Retained Earnings	Average number of employees	Tangible assets
BRAZIL	475	0	475	89	17	24	378	366	4,575	243
CHINA	263	20	283	38	6	6	42	113	1,180	90
CZECH REPUBLIC	122	9	131	9	1	2	43	11	537	78
FRANCE	107	3	110	10	1	2	3	24	250	30
GERMANY	4	31	35	9	1	3	5	8	105	2
HUNGARY	11	8	19	-3	0	0	4	-7	261	10
INDIA	702	5	707	99	23	24	70	427	6,975	265
ITALY	95	1	96	7	2	2	13	43	346	82
LITHUANIA	60	0	60	8	1	1	8	25	224	29
MEXICO	883	18	901	94	31	25	540	806	5,837	550
MOROCCO	4	0	4	0	0	0	3	1	56	3
NETHERLANDS	0	1	1	0	0	0	0	42	4	0
PORTUGAL	23	2	25	1	0	0	5	8	261	13
ROMANIA	119	3	122	12	2	2	6	34	672	48
RUSSIA	0	0	0	0	0	0	2	-2	10	0
SLOVAKIA	169	2	171	17	2	3	0	22	412	35
SOUTH KOREA	13	0	13	0	0	0	0	0	6	0
SPAIN	772	122	894	77	5	6	734	646	2,500	421
UNITED STATES	325	2	327	8	0	0	160	180	1,205	129
TOTAL	4,147	227	4,374	475	92	100	2,016	2,747	25,416	2,028

In the event that the OECD or European authorities publish new regulations, guidelines or interpretations, these figures could be subject to adjustments in the future, in any case within the required deadlines for making such changes.



Consolidated corporate income tax

In 2025, CIE Automotive's consolidated **corporate income tax expense amounted to €121.6 million, which is equivalent to 25.1% of its pre-tax profit** (effective tax rate). While income tax tends to be considered the prime indicator of an organisation's tax contribution, in practice it only represents a portion of the worldwide tax burden. In the case of CIE Automotive, corporate income tax accounted for 20% of its Total Tax Contribution in 2025, demonstrating that the Group's real contribution to the different countries' public finances is bigger than this specific tax amount.

Elsewhere, its weighted average nominal tax rate, which weights the statutory rate applicable in each jurisdiction by the profits generated, was 26.5%.

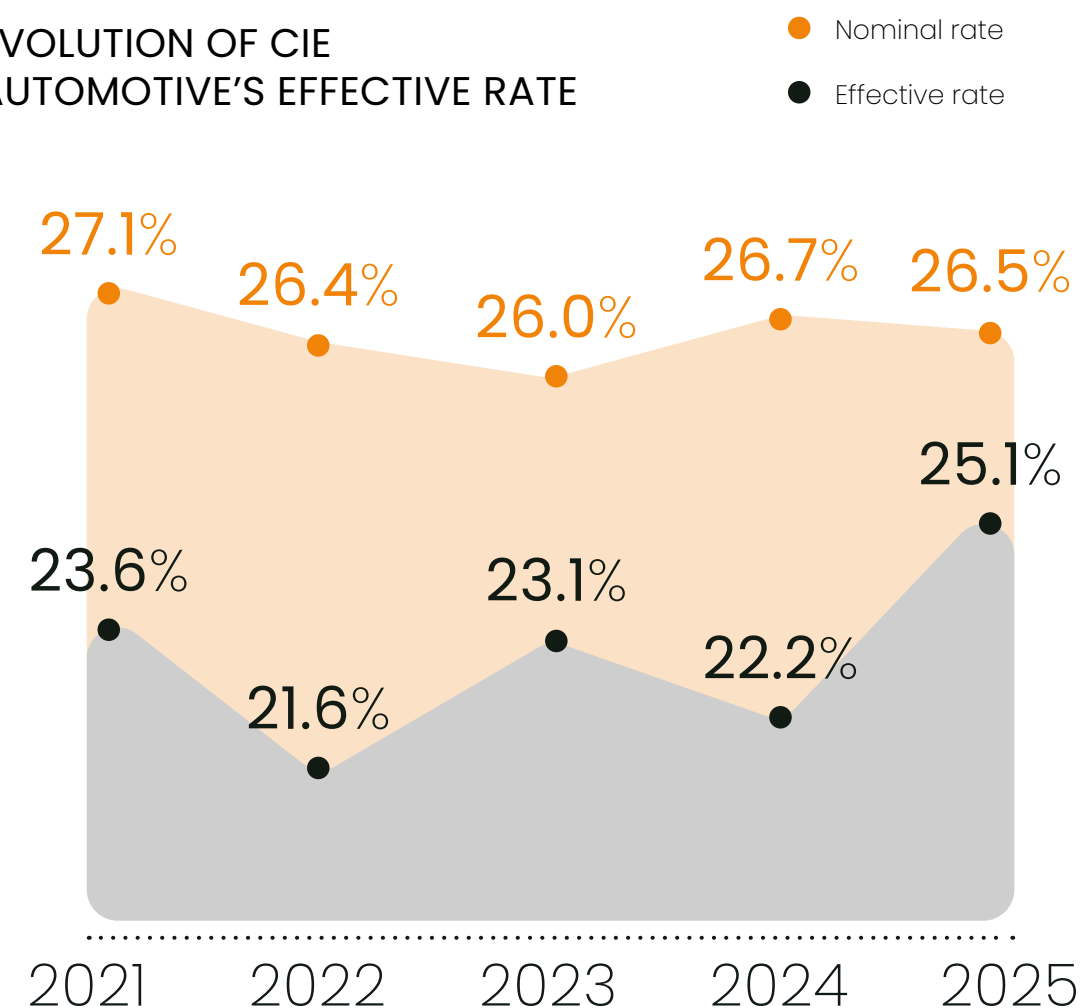
Accounting methodology explains the difference between accrued or recognised tax expense and actual payments. Under the accrual basis of accounting, tax expense is recognised in the statement of profit or loss when it is generated, whereas tax payments represent the actual cash flows, which need not necessarily coincide in time with the accruals. For this reason, the effective tax rate calculated on the basis of tax expense does not always match the effective rate calculated on the basis of taxes paid.

Fuller information about CIE Automotive's corporate income tax is provided in the Group's consolidated financial statements, as well as in the separate financial statements of each subsidiary, so guaranteeing the consistency, detail and transparency of the figures reported.

Visit the corporate website here for more information



EVOLUTION OF CIE AUTOMOTIVE'S EFFECTIVE RATE



The sustained growth in CIE Automotive's profitability in 2025 once again translated into corporate income tax expense of over €100 million.

In recent years, the Group's **effective tax rate** has been consistently within a band of 22% to 25%, evidencing a consistent and predictable tax contribution. This level of taxation places CIE Automotive clearly above the Pillar Two minimum global tax rate of 15% prescribed by the OECD for large multinational enterprises.



The tables below reconcile the Group's profit before tax (PBT) and its consolidated taxable income and its nominal and effective tax rates:

€ Million	2025
Profit before tax (*)	485.8
Adjustments to profit before local taxes and permanent differences	(47.6)
Temporary differences	(34.7)
Taxable income before tax relief	403.5
Utilisation of tax losses	(26.7)
Consolidated taxable income	376.8
Current tax at the rates applicable in each country	102.3
Tax relief applied	(3.7)
Current tax	98.6
Deferred tax	7.6
Other impacts	15.4
Consolidated income tax expense	121.6
Effective rate (**)	25.1 %

%	2025
Nominal rate Biscay	24.0%
Difference between rate in Biscay and other jurisdictions	2.5%
Permanent differences	(2.4%)
Tax credits	(0.6%)
Withholdings and other taxes	1.5%
Other	0.1%
Effective rate (**)	25.1%

(*) Profit before tax from continuing operations and discontinued operations excluding the share of profits of equity-accounted investees.

(**) Total corporate income tax expense over profit before tax from continuing operations.

The differences between the treatment of certain items of income and expenses for accounting and tax purposes, which generate **deferred tax assets and liabilities**, along with **unused tax losses** and **unused tax credits**, are recognised on the Group's consolidated balance sheet and are disclosed in its annual consolidated financial statements for 2025.

As at 31 December 2025, the Group recognised the following deferred tax assets and deferred tax liabilities, estimated at the amounts expected to be realisable within a reasonable timeframe, usually within a maximum of 10 years:

Deferred Tax Assets

€ Million	2025
Provisions and other temporary differences	149.6
IFRS 16 losses – Deferred tax assets	17.7
Losses carried forward	33.2
Tax credits	30.3
Total	230.8

Deferred Tax Liabilities

€ Million	2025
Goodwill	109.1
Fair value gains	34.2
IFRS 16 – Deferred tax liabilities	16.7
Accelerated depreciation and other	71.9
Total	231.9

Global Minimum Tax

In December 2021, the OECD published its Pillar Two Model Rules, which are designed to ensure large multinational enterprises pay a minimum level of tax on the income arising in each jurisdiction where they operate. This legislation applies to groups with consolidated revenue of more than €750 million.

One year later, in December 2022, the European Union approved Directive (EU) 2022/2523 on ensuring **a global minimum level of taxation for multinational enterprise groups and large-scale domestic groups in the Union**.

Locally, the Biscay Tax Authorities then partially transposed that Directive in the form of Provincial Law 4/2024, of 27 December 2024, with the purpose of guaranteeing that the aggregate results per country of each constituent entity are subject to minimum taxation of 15%. However, this piece of legislation only incorporated the implications derived from State Law 7/2024 in respect of 2024. The definitive transposition and full incorporation of the global minimum tax into Basque legislation ultimately materialised in the passage of Regional Act 06/2025, of 12 December 2025.

To bring about its key objective, the legislation establishes two key mechanisms:

1

The Income Inclusion Rule (IIR), applicable in fiscal years beginning on or after 1 January 2024.

It comes into play when a jurisdiction presents an effective tax rate of less than 15%.

2

The Undertaxed Profits Rule (UTPR), applicable in fiscal years beginning on or after 1 January 2025. This rule provides for a top-up tax in jurisdictions in which, following application of the IIR, the effective tax rate remains below 15%.



Following full implementation of this new framework, we have reinforced our commitment to compliance, responsible and rigorous conduct around implementation



TRANSITIONAL RELIEF AND SAFE HARBOURS

The global minimum taxation regime transposed into Basque tax law includes the transitional relief contemplated in both the Directive and the OECD's Pillar Two Model Rules. Specifically, multinational enterprises may apply the permitted **safe harbours** to avoid fully calculating their minimum taxation provided that, in accordance with their Country-by-Country Reports and considering the deferred taxes of the constituent entities, the following thresholds are met for the selected jurisdiction:

15%

FOR TAX PERIODS BEGINNING IN 2023 AND 2024.

16%

FOR TAX PERIODS BEGINNING IN 2025.

17%

FOR TAX PERIODS BEGINNING IN 2026.



The Global Anti-Base Erosion rules ("GloBE rules") contemplate an additional safe harbour for jurisdictions where a group's profit or loss before income tax, again as per the CbCR, is equal to or less than the substance-based income exclusion amount, calculated on the basis certain percentages of tangible assets and personnel costs.

In January 2026, the OECD published the so-called *Side-by-Side Package*, the central element of which is the new *Side-by-Side (SbS) Safe Harbour*. Under this mechanism, where the jurisdiction of the ultimate parent entity meets certain equivalency criteria, the group is exempt from applying the Income Inclusion Rule (IIR) and the Undertaxed Profits Rule (UTPR) under Pillar II for fiscal years beginning in 2027.

In addition to this specific *safe harbour*, the package expands and develops other mechanisms aimed at facilitating compliance, including a permanent safe harbour based on a simplified effective tax rate (*Simplified ETR Safe*

Harbour), a one-year extension of the transitional Country-by-Country Reporting safe harbour, as well as a safe harbour applicable to substance-based tax incentives.

Taken as a whole, the *Side-by-Side Package* seeks to reduce the complexity and administrative burdens associated with Pillar II, clarify the interaction between the OECD framework and domestic tax systems—with particular focus on the United States, currently considered a qualified jurisdiction—and lay the groundwork for future reviews and refinements of the global minimum tax architecture.

Once the *Side-by-Side Safe Harbour* is transposed into the relevant local legislation, CIE expects a significant reduction in the administrative burden arising from the need to perform a full GloBE tax calculation in most of the jurisdictions in which it operates, supported by the fact that the Group records a simplified effective tax rate above 15% in the majority of those jurisdictions.



Intragroup tax alignment

CIE Automotive's global growth strategy is underpinned by a **business model designed to deliver sustained and all-encompassing growth** by offering industrial solutions close to the main production hubs of its customers all around the world.

This geographic proximity not only drives operating efficiency but also allows us to respond more agilely to the changing needs of our customers in each market.

However, operating in close to 20 countries requires **rigorous management of intragroup relations** to ensure that the distribution of profits among the various subsidiaries faithfully reflects the real value created in each territory.

To this end, the Group stringently applies the **arm's length principle** so as to guarantee that all transactions among Group companies go through on terms equivalent to transactions between independent entities in comparable circumstances.

This approach is the foundation of our **transfer pricing policy**, which is fully aligned with the **OECD's Guidelines** and the actions of the **BEPS Plan**, designed to prevent base erosion and artificial profit shifting.

RESPONSIBLE MANAGEMENT OF RELATED PARTY TRANSACTIONS

Despite the complexity of operating across multiple regulatory frameworks, the tax risk associated with intragroup transactions at CIE Automotive is low thanks to the Group's eminently industrial nature.

CIE Automotive **neither centralises its profits nor uses structures for specific tax purposes**; the transactions carried out between subsidiaries reflect real business support functions or services.

These transactions fundamentally comprise **corporate services provided by the parent**, such as technical assistance, administrative management, quality assurance, financial and IT services, all of which are **arranged on an arm's length basis**, in keeping with prevailing legislation.

The **Corporate Tax Department** coordinates the correct application of these policies across all jurisdictions, ensuring the use of like, consistent and duly documented criteria.

In addition, each significant transaction is submitted to the **Board of Directors** for review, in compliance with company law and good governance standards, ensuring transparency and traceability throughout the entire process.

TRANSFER PRICING: DOCUMENTATION AND TRANSPARENCY

CIE Automotive keeps up-to-date versions of all of the documentation required under Action 13 of the BEPS Plan, which regulates the preparation of the **Master File, Local File** and **CbC Report**.

This documentation provides thorough and complete information about the Group's functional structure, risk profile, transfer pricing policy and consolidated financial information.

Compliance with these record-keeping obligations is supported by a **global network of tax experts**, as well as internal and external audits to verify data consistency and correct application of the different methodologies.

This system reinforces **legal protection** and raises the technical quality of the information presented to the various tax authorities, reducing the risk of tax-related controversies or restatements.

In 2025, the Group revised and updated its internal procedures to ensure the **consistency of its transfer pricing framework with respect to the minimum global tax rules derived from the OECD's Pillar Two Model Rules and related European Union legislation**.

This update has tightened alignment between CIE Automotive's international tax policy and the new global fairness and transparency standards.

COMMITMENT AND OVERSIGHT

International tax management is embedded into the Group's **global tax governance model**.

The **Board of Directors**, through its **Audit and Compliance Committee**, regularly reviews the Group's transfer pricing policies, significant transactions and transparency reports.

This supervision ensures that all major tax decisions are taken on the basis of rigorous technical input so that they uphold the law and align with the organisation's ethics and sustainability values.

CIE Automotive participates actively in business and technical forums devoted to international tax harmonisation, leveraging its industrial expertise and experience to enhance global tax compliance practices.

In this manner, the Group is forging a **consistent, transparent and socially responsible international tax model** conducive to fair profit distribution, so boosting its credibility as a taxpayer in the various tax systems it engages with.



[04] Tax governance and risk control

CIE Automotive boasts a **solid and transparent corporate governance model**, designed to ensure the responsible, ethical and sustainable management of the Group. The model is underpinned by a proprietary body of rules and procedures that are aligned with best practices in corporate governance, business ethics and stakeholder value creation.

- Our governance and risk management model
- Auditor independence: safeguarding transparency and reliability
- Credibility-enhancing engagement with the tax authorities
- CIE Automotive and its stance on tax havens



Our governance and risk management model

Specifically in terms of tax governance, CIE Automotive articulates its structure around three complementary levels of supervision to ensure compliance with tax legislation and the Group's own tax strategy, as well as due accountability before its internal management bodies and society at large.

This three-level model permits effective, coordinated and responsible management of taxation and embeds the tax function into CIE Automotive's overall corporate governance system.

In practice it ensures:



Effective compliance with applicable legislation



Continuous supervision and control



Transparent decision-making



A sustainable long-term tax contribution by the Group

In this manner, CIE Automotive has built an exemplary tax governance model aligned with the most stringent international standards and its mission to act as a global benchmark when it comes to responsible taxation





LEVEL 1 Tax Function

The Tax Function constitutes the first line of defence in the tax model. Its remit is to apply and oversee **compliance with the Group's tax strategy** in all of the jurisdictions where CIE Automotive operates.

Its ultimate mission is to ensure that all tax decisions are taken in conformity with prevailing legislation, international standards on responsible taxation and the Group's ethics principles. It also lends **proactive support to all of the business areas**, framed by the Group's explicit commitment to paying taxes and managing risks prudently and the shared goal of generating recurring and sustainable profits.

The Tax Function is in turn organised into two levels:

The Corporate Tax Area:

Integrated into the Management Control & Tax Department, it reports directly to the CEO.

Its main responsibilities include:

- Coordination of the global tax policy;
- Harmonisation of tax criteria;
- Review of significant transactions entailing tax risks;
- Active engagement with the tax authorities.

Local Tax Areas:

These units fall under each country's finance department and are responsible for **operational execution of the Group's tax strategy**, presentation of tax returns, diligent compliance with applicable tax obligations and direct dealings with the local tax authorities.

They report to the Corporate Tax Area, so ensuring the alignment and traceability of tax-related processes Group-wide.

LEVEL 2 Audit and Compliance Committee

The Audit and Compliance Committee provides the second line of supervision in the tax governance model.

Its work focuses on **overseeing the internal control and risk management systems** including tax related risks, and ensuring the integrity of the Group's financial and non-financial reporting efforts.

Tax-wise, the Committee carries out the following duties:

- Supervising effectiveness of the internal tax control system and correct management of the identified tax risks.
- Reporting to the Board of Directors on the tax policies applied and the tax implications of strategic transactions.
- Ensuring the independence and objectivity of the external auditor when reviewing the Group's financial and tax information.
- Fostering the dissemination of best tax practices across the Group, reinforcing a culture shaped by compliance and transparency.

The Audit and Compliance Committee operates in keeping with the principles prescribed in GRI 207 and Spain's good governance recommendations for listed companies, so ensuring consistency between the organisation's tax management and its ESG objectives.

LEVEL 3 Board of Directors

The Board of Directors is CIE Automotive's highest governance and supervisory body for tax and corporate governance matters.

Its role is to define **the Group's global tax strategy, approve tax policies and guidelines and ensure their correct application** across all subsidiaries and jurisdictions.

Its main responsibilities include:

- Determining and approving the tax strategy and its defining principles.
- Authorising transactions or structures involving significant tax risks.
- Supervising the effectiveness of the internal control model and tax risk management policies.
- Collecting information periodically about compliance with the tax strategy.
- Ensuring alignment between the Group's tax strategy, ESG strategy and sustainability objectives.

The Board also works to foster a **culture of integrity and responsibility around taxation**, disseminating the values of transparency and compliance across all Group companies, irrespective of the jurisdiction they operate in.



Auditor independence: safeguarding transparency and reliability

In an increasingly regulated global environment, ongoing auditor independence is a prerequisite for earning and **retaining the trust of investors, governments and society** and is essential to complying with the highest standards of ethics and corporate governance.

At CIE Automotive, the independence of the financial statement auditor is a non-negotiable component of our corporate governance system and an imperative for ensuring the veracity, reliability and transparency of the financial and tax information we provide to our stakeholders. Moreover, auditor independence acts **as a safeguard for public trust**, so reinforcing the Group's commitment to doing business ethically.

AUDITOR ROTATION

With the aim of upholding the highest standards of independence, CIE Automotive **periodically rotates its audit firms**, in keeping with national and international regulations.

Proactivity around the renewal, occasionally ahead of the required deadlines, of the firms responsible for our financial statement audits reflects a prudent and preventative policy designed to avoid any risk of dependence and encourage objective external reviews of the Group's financial and tax information.

LIMITS ON NON-AUDIT SERVICES

CIE Automotive has a strict policy when it comes to arranging services with the external auditor other than the statutory audit under which only ancillary or strictly necessary additional services are permitted, and only if expressly authorised by the Audit and Compliance Committee.

This approach **avoids any possible conflicts of interest** and ensures that the external auditor carries out its work objectively and impartially.

ROLE OF THE AUDIT AND COMPLIANCE COMMITTEE

The Committee is the body tasked with supervising **the independence of the external auditor** and is responsible for its appointment, re-appointment and, if applicable termination.

It also analyses, individually and on aggregate, the potential threats to auditor independence derived from engagements or services provided by entities related to the auditor, applying to that end the criteria prescribed by the CNMV in Spain, the EU and in the International Standards on Auditing (ISA).

The Committee monitors the auditor's work continually to ensure effectiveness, transparency and alignment with applicable accounting and tax standards.

PUBLIC INDEPENDENCE DECLARATIONS

Annually, CIE Automotive's auditors issue formal declarations of independence, which are published along with the consolidated financial statements on the Group's corporate website.

These declarations constitute **objective proof** of compliance with the legal and ethical requirements in place to guarantee the independence of auditors and transparent external assurance processes.



Credibility-enhancing engagement with the tax authorities

CIE Automotive engages continually and constructively with the public and tax authorities in all of the countries where it does business.

This collaboration reflects our desire to actively contribute to making tax systems stronger by fostering and facilitating **legal certainty, technical dialogue and mutual trust**.

Our approach is articulated around three pillars: **transparent reporting, constant communication and proactive engagement**, all with the aim of moving towards a more predictable, efficient and sustainable compliance model.

A PREVENTATIVE AND RESPONSIBLE APPROACH TO ENGAGEMENT

When it comes to dealing with the tax authorities, CIE Automotive's institutional relations policy is based on forward-looking collaboration in order to anticipate possible discrepancies and facilitate correct application of tax legislation.

This approach is structured around three essential lines of initiative:



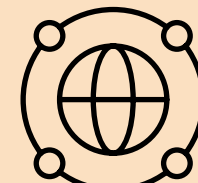
Continuous, technical dialogue

We maintain open communication channels with the tax authorities, framed by the principles of good faith, professional conduct and mutual respect. This direct contact allows us to address complex issues, clarify criteria and find balanced solutions that lend stability to our operations.



Transparent and accessible information

We voluntarily provide the information needed to facilitate the tax authorities' supervisory work. This commitment includes, in addition to compliance with its various obligations, collaboration during inspections and the proactive presentation of enquiries or substantiating documentation whenever a given transaction so requires.



Prevention and institutional cooperation

We participate actively in the forums and taskforces organised by public organisations, sharing our experience as an industrial group and with international taxation issues in a bid to improve regulations and simplify procedures. This approach helps build a more predictable and balanced tax environment.

ALIGNMENT WITH SPAIN'S CODE OF BEST TAX PRACTICES

CIE Automotive is a signatory of the **Code of Best Tax Practices** approved by Spain's tax authority (AEAT).

Endorsement of this voluntary code strengthens the relationship of mutual trust between the government and its taxpayers and translates into specific commitments:

- Fostering **legal certainty** through the constant exchange of transparent information.
- Encouraging **loyal collaboration** and **good faith interpretations** of tax law.
- Promoting **responsible tax policies**, endorsed by the Group's governing bodies.

This cooperative model constitutes one of the core components of our responsible tax strategy and is aligned with the principles set down in **GRI 207** and the contents of the **Tax Responsibility & Transparency Index**.



MULTINATIONAL TAX SUPERVISION AND RIGOROUS MANAGEMENT OF INSPECTIONS

As a listed industrial multinational enterprise, **CIE Automotive is subject to continuous supervision** by the tax authorities of the more than **23 jurisdictions** where it operates.

This degree of control guarantees the transparency of our global operations even though it can also entail **routine tax inspections or discrepancies in the interpretation of tax law** derived from regulatory complexity and differences across national tax frameworks.

In keeping with our **Corporate Tax Policy**, all of these procedures are handled with the **utmost expertise and professionalism**, under the guidance of the **Corporate Tax Department** with the support of **specialist in-house and outside advisors**.

This approach allows the Group apply consistent criteria in each market and makes us more predictable and reliable in the eyes of the competent authorities, underpinned consistently by the ethical principles that guide our tax conduct.

REDUCED LITIGATION AND PREVENTION OF TAX CONFLICTS

CIE Automotive manages the tax risks derived from its business activities so as to prevent conflicts around interpretation or litigation with the tax authorities. Before taking any decision, it analyses the possible tax implications exhaustively, weighing up the alternatives and opting for that which, as per prevailing law, the authorities' criteria and applicable jurisprudence, offers the greatest legal certainty and least exposure to risk.

As a result, **tax litigation has a very limited impact** at the Group and is limited to those cases in which there are solid legal and financial arguments to justify defence of the position taken.

This prudent approach is consistent with our low tax risk profile and our commitment to responsible taxation.

CONTINUOUS COOPERATION WITH THE INSTITUTIONS

CIE Automotive articulates its engagement with the authorities around an **alliance based on ethics, trust and reinforced voluntary compliance**.

By endorsing codes of best practices, collaborating with the national and international tax authorities and actively contributing to making local tax systems stronger, we are forging a **responsible, transparent and sustainable tax model**.

At home, we **are in constant dialogue with the Basque tax authority**, the tax jurisdiction under which the Group parent falls. This relationship is based on transparency, trust and institutional cooperation and has been cemented over the course of regular meetings, consultations prior to decision-making and participation in expert taskforces, including the so-called **Joint Permanent Relations Forum** rolled out by the Basque tax authority in 2025. The idea behind this new forum is to create a space in which to share and learn about the issues that arise in the course of

navigating the tax system, while also disseminating new developments and criteria.

This outreach initiative not only strengthens our institutional relationship with the tax authority but also allows us to **share our technical expertise and hands-on experience** with international taxation issues, so helping to modernise the Basque tax system and create an environment of greater legal certainty for other businesses.

All of which echoes our commitment to continuing to advance towards a model of **cooperative engagement with the authorities**, through a combination of **rigorous compliance, technical dialogue and contribution to the common good**, reaffirming CIE Automotive's role as a **benchmark for tax governance and assuming shared and vested responsibility**.

CIE Automotive believes that collaboration between the private sector and public authorities is essential to moving tax systems towards more modern, digital and sustainable models





CIE Automotive and its stance on tax havens

CIE Automotive has a clear and responsible position when it comes to its international footprint and tax structure.

The Group carries out its activities only in jurisdictions in which it has **real business activities, corporate substance and can effectively comply with applicable legislation**. It therefore rejects all aggressive tax planning practices and the use of low- or zero-tax territories in order to eke out undue savings.

We are fully aware that the existence of entities in countries with laxer tax regimes can adversely impact stakeholder perceptions, even when they are justified by operational or legacy factors.

As a result, we take a **proactive and transparent** approach aimed at ensuring that our corporate structure faithfully reflects the Group's industrial and business reality and that all tax-related decisions align with ethical criteria consistent with our values.

RESPONSIBLE PRESENCE AND TRANSPARENCY COMMITMENT

CIE Automotive **does not invest in or through territories classified as tax havens** in order to gain undue tax benefits.

The Group only incorporates or keeps companies for **legitimate business reasons** associated with production, logistics, sales or the provision of services.

The Group **expressly bans** the creation or use of opaque structures or structures lacking in economic substance that could unduly reduce its tax burden or hinder the traceability of its activities.

Each CIE Automotive entity must certify its **real function within the value chain** and comply with the legal and tax obligations applicable in its jurisdiction.

All decisions related to the creation, acquisition or maintenance of foreign subsidiaries are **first submitted to the Board of Directors**, so guaranteeing that they are framed exclusively by industrial, strategic or operational efficiency criteria.

GOVERNANCE AND CONTROL OF THE INTERNATIONAL STRUCTURE

The Board of Directors, through its **Audit and Compliance Committee**, supervises the Group's global corporate structure and signs off on any transaction that involves having a presence in territories that present tax risks or are considered opaque.

This oversight function includes periodical reviews of the **list of non-cooperative jurisdictions** compiled by the European Union and OECD to ensure that no CIE Automotive company is domiciled in a listed country.

It also systematically controls the **economic substance and corporate purpose** of all of its subsidiaries, verifying that their activities, staff and resources are aligned with the nature of their businesses.

This continuous assessment guarantees that the corporate structure evolves in line with the Group's real productive activity and the ethics and sustainability principles that guide our actions and management.

LIQUIDATION OF OUR COMPANY IN BARBADOS

In line with this **responsible taxation policy**, in 2025, CIE Automotive completed the liquidation of its company in **Barbados**, which the Group inherited in 2019 as part of a broader acquisition.

The liquidation decision was made in 2022 following a restructuring process, carried out in coordination with the competent authorities under the scope of a gradual rationalisation plan initiated in the wake of that transaction.

Having finalised that process, CIE Automotive **has eliminated its presence in uncooperative territories** and today only has a residual interest in one service company domiciled in the Netherlands, whose details are provided below:

Country	Company name	Activity	Revenue	Profit/(loss) before income tax	Income tax paid	Income tax accrued current	Capital declared	Accumulated earnings	No. of employees	Tangible assets
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NETHERLANDS	Golde Netherlands, BV	Holding company	602,000	(11,000)	0	0	102	42,178,471	4	0
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Data in euros except for the average number of employees.





[05] Ethical, responsible and sustainable taxation

At CIE Automotive we view taxation as an articulating component of our contribution to economic and social development. It is part of our larger approach to sustainability, which encompasses **ethical management, transparency and corporate citizenship**. Taxation plays an essential role in the creation of shared value and its integration into our ESG strategy is a hallmark of the Group's identity.

- Tax strategy and principles
- Best practices and sustainability



Tax strategy and principles

CIE Automotive's tax strategy translates into a comprehensive management model that goes beyond mere compliance with the law. Its purpose is guarantee consistent, transparent and responsible conduct so as to contribute to **value creation** for our shareholders and to economic and social development in our business markets.

Based on the principles of ethical conduct, prudence and sustainability, this strategy combines legitimate tax efficiency and a firm commitment to the collective wellbeing. It translates into six lines of initiative that guide our decision-making and define the Group's tax culture.

1. COMPLIANCE AND RESPONSIBLE TAX



Underpinning CIE Automotive's tax strategy is a **firm commitment to stringent compliance with tax legislation** in Spain and abroad.

This principle materialises in **robust in-house policies and standardised procedures** designed to ensure full and timely compliance with all tax obligations across all our tax jurisdictions.

The Group constantly monitors updates to tax law around the world, anticipating legislative and regulatory developments in each country, adapting its operations in consonance and avoiding any unreasonable interpretations of tax standards. In this manner, we ensure that tax management is consistent, coherent and updated across all of our subsidiaries, reinforcing the reliability and traceability of the underlying processes.

Our compliance effort factors in both the aims of the legislators and the underlying economic rationale. When the complexity or significance of an issue so requires, we check our interpretation of the tax rules with prestigious tax advisors. In sum, we assume a low profile when it comes to tax risk, characterised by prudent tax decisions, as borne out by the scant materiality of tax restatements across the Group.

2. TRANSPARENCY AS THE ARTICULATING AXIS



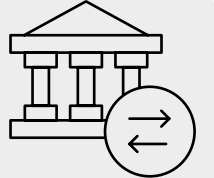
Access to information is a consistent feature of tax management at CIE Automotive and a core element of our commitment to sustainability and public accountability.

We believe that the provision of **clear, traceable and accessible tax information** is key to strengthening our relationship with our stakeholders: investors, employees, business partners, customers and tax authorities.

To that end, our policy is to **voluntarily and systematically share tax information**, providing full, verifiable and comparable information about our tax contribution in all of our business markets.

This practice is borne out by the regular publication of this **Tax Contribution Report** and our participation in **transparency initiatives and external assessments**, which publicly benchmark the Group's performance against the highest international standards.

3. COLLABORATIVE ENGAGEMENT WITH TAX AUTHORITIES



CIE Automotive engages **openly, transparently** and **constructively** with the tax authorities in all of the countries where it does business.

More specifically, our engagement with the tax authorities is built upon the principles of **constant dialogue, honesty** and **good faith** with the aim of ensuring that the Group's tax decisions are understood and endorsed by the competent authorities.

This attitude of **active cooperation** allows us to identify divergent interpretations before they become a problem and facilitates the **rapid and efficient resolution of tax incidents or discrepancies**, ensuring ongoing compliance in all jurisdictions.

We **make enquiries about tax criteria and ask for assessments or confirmations** around transactions with significant tax implications before they are carried out.

This practice injects **legal certainty and transparency** into the decision-making process and reinforces our credibility in the eyes of the authorities, aligning our conduct with the highest standards of lawfulness, ethics and tax responsibility.



4. TAX RISK MANAGEMENT: CONTROL, GOVERNANCE AND PREVENTION



Tax risk management is an essential component of CIE Automotive's corporate governance and a strategic driver of its business ethics and sustainability efforts.

The Group has a **comprehensive control and monitoring model**, designed to identify, assess and mitigate potential tax risks across all of its international operations. This model is underpinned by in-house policies and IT systems that deliver **systematic and traceable analysis** of the risks associated with the various jurisdictions. The model classifies tax risks into four major categories:

- Compliance risk: related with effecting upholding the Group's tax-related obligations, such as the presentation of tax returns or requests for information from the authorities.
- Interpretation risk: derived from possible discrepancies around the interpretation of tax law and rules.
- Regulatory risk: associated with the volatility and complexity of the legislative thrust.
- Reputational risk: linked to public scrutiny of how transparent we are being and how stakeholders perceive our tax compliance effort.

Effectiveness of the Group's tax risk control model is ensured by **horizontal and multilevel supervision of these risks**, a process which involves the local teams and the Group's governing bodies, including the **Audit and Compliance Committee**, the **Board of Directors** itself and the **Internal Control and Audit Department**.

In addition, we submit the model to **regular internal and external audits** which reinforce the reliability of the tax control system and ensure **alignment between our tax policies and our strategic targets**.

5. BALANCED TAXATION ALIGNED WITH VALUE CREATION



Our tax policy is built on fairness and alignment between the place where the taxable event occurs and that where tax is paid.

CIE Automotive declares its profits in the places where it really generates value without ever attempting to avoid taxation or artificially shift profits.

We stringently apply the **OECD Transfer Pricing Guidelines** and the **BEPS Plan Actions** so as to ensure that intragroup transactions are arranged on an arm's length basis.

This approach contributes to fair and proportionate taxation aligned with the reality of our global operations.

6. TAXATION AT THE SERVICE OF DEVELOPMENT



At CIE Automotive we view taxation as a **driver of economic and social development**.

Through the taxes we pay, we directly help finance essential public services – education, healthcare, infrastructure and innovation – and strengthen our local communities' social fabric.

Together, these six principles give shape to a solid and ethical tax strategy aligned with the highest international standards. Its application ensures that our tax contribution is not only legally correct but also socially useful, reinforcing CIE Automotive's reputation as a benchmark in governance and responsible taxation



AN ETHICAL, DYNAMIC AND GLOBAL TAX FRAMEWORK

Taxation is evolving to the beat of globalisation, digitalisation and sustainability. As a result, our tax strategy is a **living and adaptable** framework. It is approved at the Board level and reviewed regularly to layer in current international best practices.

We **interpret** tax standards **prudently and consistently**, we prioritise the prevention and control of risks and we ensure **direct supervision by the Board and its Audit and Compliance Committee**. In this manner, we guarantee fair and predictable taxation, fully embedded into the Group's ESG targets.

We also review the foundations of our tax strategy regularly to factor in regulatory developments and ensure we remain fully aligned with the standards defined by the authorities and courts in each jurisdiction.



We review the foundations of our tax strategy regularly to factor in regulatory developments and ensure we remain fully aligned with the standards defined by the authorities and courts in each jurisdiction



Principles governing our tax strategy

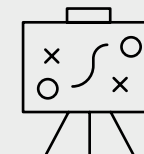
1. Global tax compliance and adaptation



We fully uphold all tax provisions in the countries where we operate, applying local and international standards in a consistent manner.

Our compliance model is updated constantly in response to the **challenges posed by a global tax environment in the throes of transformation**, fuelled by digitalisation, international cooperation and new regulatory developments. In this way, we ensure homogeneous and rigorous management aligned with best practices in tax governance.

2. Prudent and consistent interpretations



We base our tax decisions on prudent, consistent and reasonable interpretations of applicable law, at all times aligned with the economic reality of our operations.

In the event of complex transactions, we act proactively, asking the tax authorities for **clarifications or prior assessments** in order to ensure legal certainty, transparency and predictability.

3. Prevention and management of tax risks



We prioritise the **identification and mitigation of significant tax risks** and have embedded their management into our overall internal control and risk management systems.

Our model involves regular assessment, tax analytics tools and internal and external audits to ensure that our taxation faithfully reflects our activities, resources and business risks.

4. Tax as a driver of social value

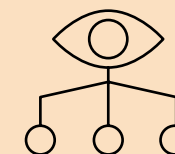


We acknowledge that taxes make an **essential contribution to economic and social development** in our business communities.

Every year we measure and publicly disclose our **Total Tax Contribution** and **Country-by-Country Report**, which evidence the scale and reach of our tax impact.

This commitment is aligned with the United Nations **Sustainable Development Goals** and reinforces our view of taxation as a tool for development, justice and sustainability.

5. Board supervision and governance



The **Board of Directors** and its **Audit and Compliance Committee** oversee application of our tax strategy and regularly analyse the tax implications of our strategic decisions.

This governance framework ensures the **traceability, transparency and accountability** of our tax management effort and guarantees that our tax principles are fully embedded into the Group's corporate, finance and ESG strategies.

6. Trust-based relations and cooperation with the tax authorities



We foster relations with the tax authorities **based on mutual trust, transparency and professional conduct**.

We encourage open dialogue and cooperation as the cornerstones of responsible taxation, we participate in cooperative compliance initiatives and we strive to resolve possible discrepancies before they become a problem.

In parallel, CIE Automotive exercises its **legitimate right to uphold its corporate interests**, acting lawfully and in line with the most stringent standards of tax ethics at all times.



Best practices and sustainability

The Group's tax strategy is fully integrated into its **ESG framework**, so that all tax-related decisions are taken in accordance with the criteria of lawfulness, prudence and having a positive impact on social and economic development.

This approach is reflected in our endorsement of **best practices in taxation**, the importance we attach to taxation as a driver of sustainability and the accolades awarded to our transparency efforts.

COMMITMENT TO BEST PRACTICES IN TAXATION

The compliance model fostered by CIE Automotive is based on accessibility, integrity and shared responsibility with the public authorities.

We understand that a balanced tax footprint and collaborative attitude are key to developing more stable and sustainable societies.

Here our key initiatives include:

- **Endorsement of the Code of Best Tax Practices** championed by Spain's tax authority, the AEAT, and the collaborative Large Enterprises Forum. The principles of conduct set down in this voluntary framework are loyal collaboration, legitimate trust and good faith interactions between the authorities and taxpayers. Its application reinforces legal certainty, tightens fraud prevention and fosters constant communication with the tax authorities.
- **Participation in the Basque tax authority's Joint Permanent Relations Forum**, a space for collaboration designed to fuel the exchange of know-how and unlock progress towards a more transparent, digital and efficient tax model.
- **Prudent management of tax risk**, as an integral part of the overall enterprise risk management system. Tax policies are reviewed and approved at the Board level, under the supervision of the Audit and Compliance Committee, so guaranteeing consistency and traceability across all jurisdictions.
- **Periodical and voluntary publication** of this Tax Contribution Report and of our Corporate Tax Policy, documents which set out the Group's principles, duties and supervisory mechanisms and reinforce its accountability before all of its stakeholders.
- **Prohibition of the use of opaque structures or structures lacking in economic substance**, ensuring that each Group entity carries out a real activity, using its own resources and on an arm's length basis, in line with the OECD's Guidelines and BEPS Plan Actions.
- **Continuous training and a culture of responsible taxation**, which is nurtured internally to strengthen ethical professional conduct and the technical expertise of the Group's financial and management teams.

These practices cement CIE Automotive as a benchmark in transparency, governance and institutional outreach and make its tax management model one of the most advanced in the worldwide manufacturing sector.





RESPONSIBLE TAXATION AND SUSTAINABILITY

Responsible taxation is a structural component of CIE Automotive's **2025 Sustainability and ESG Strategy**.

We see our taxes as a direct means of **contributing to the economic and social development** of the countries where we operate, strengthening their institutions and fostering fairness.

The Group endorsed the Global Compact back in 2015 in order to develop, implement and disseminate corporate sustainability policies and practices, including **taxation as a dimension of its governance and social impact**. Against this backdrop, we view responsible taxation as a direct path to aligning with the United Nations **Sustainable Development Goals (SDGs)**, in particular:



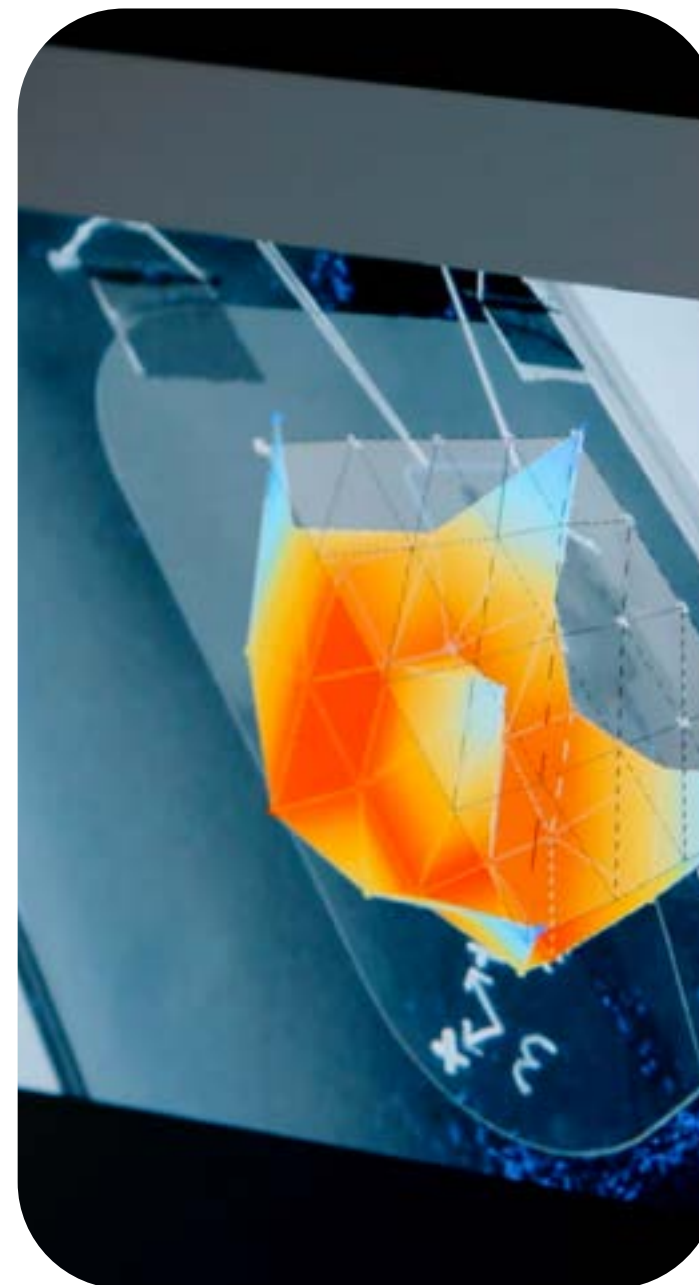
SDG 8 – Decent work and economic growth: through the generation of employment, productive investment and the payment of taxes that drive local economic activity.



SDG 9 – Industrialisation, innovation and infrastructure: by means of responsible industrial development and the infrastructure and public services financed in part thanks to our tax contribution.



SDG 16 – Peace, justice and strong institutions: enabled by transparency, ethical conduct and open collaboration with the tax authorities.



The key performance indicators reported by CIE Automotive under the umbrella of its **ESG Master Plan** include tax metrics that measure the impact of its tax contribution on social value creation.

In this manner, taxation is treated as an **enabler of sustainable governance**, which reflects the alignment between the Group's earnings and its commitment to society.

Moreover, CIE Automotive participates actively in forums and other programmes that work to integrate taxation into corporate sustainability efforts, contributing to international debates around **transparency, responsibility and tax justice**.

The ultimate goal is to continue to evolve towards a model in which taxes are seen as a **tangible expression of corporate social responsibility** and signal of the Group's ethical maturity.

In 2025, CIE Automotive strengthened its ambition to continue to advance towards a model of **excellent tax governance** by integrating tax transparency into the heart of its larger corporate sustainability efforts.

The Group plans to continue to lead the adoption of international standards by participating in responsible taxation initiatives and consolidating its role as a **multinational enterprise committed to ethical conduct, transparency and the creation of shared value**.



CEO's
statement

Executive summary

Tax performance

International
taxation

Tax governance
and risk control

Ethical, responsible and
sustainable taxation

Appendices

CIE Automotive

[06]

Appendices

- How the report was prepared: scope and applied methodologies
- Glossary of terms and definitions
- Self-assessment



How the report was prepared: scope and methodology

OBJECTIVE AND SCOPE

The Total Tax Contribution (TTC) methodology used by CIE Automotive is designed to quantify and communicate, in a comparable and verifiable manner, all of the taxes generated by the Group in all of the jurisdictions where it operates.

This tool allows the end-to-end measurement of CIE Automotive's real contribution to sustaining national public finances and reinforces its commitments around transparency, responsibility and sustainable taxation.

The information is presented on a cash basis, reporting the taxes effectively paid or collected during the fiscal year and is consolidated at the Group level using a standardised data gathering and validation process.

TOTAL TAX CONTRIBUTION (TTC) CONCEPT

The TTC comprises two major categories of taxation:

- **Taxes borne.** These are taxes that represent a direct cost for CIE Automotive and reduce its accounting profit. They include corporate income tax, taxes levied on production and specific activities, national insurance contributions borne by the employer, planet taxes and property taxes, among others.
- **Taxes collected.** These are the taxes that CIE Automotive withholds on behalf of or passes through to customers, employees, suppliers and shareholders and that do not represent a cost for it. Examples include personal income tax and dividend withholdings and valued added taxes on sales and services.

The two categories together comprise the Group's Total Tax Contribution, which is expressed in millions of euros and broken down by type of tax and country.

CLASSIFICATION BY TYPE OF TAX

To ensure international comparability, CIE Automotive categorises its taxes using PwC's Total Tax Contribution methodology and the OECD and GRI 207 guidelines.

- Profit taxes, such as corporate income tax.
- People taxes, such as social contributions and other similar charges borne or collected.
- Product and service taxes, including the indirect taxes levied on the consumption of goods and services (VAT, excise duty, sales tax, etc.).
- Other taxes, such as property taxes, planet taxes, local taxes and any other type of tax not included in the other categories.

BASIS OF CONSOLIDATION AND CONTROL

To ensure the reliability, homogeneity and traceability of the consolidated tax figures, the Group uses the following methodological principles:

- Homogeneity and comparability: application of the same criteria at all subsidiaries and in all jurisdictions.
- Rigour and traceability: data validation by means on internal reviews and financial controls.
- Transparency and exhaustiveness: voluntary publication of country-by-country information.
- Cash basis: recognition of the amounts effectively paid or collected only.
- Link with ESG: responsible taxation is an embedded pillar of the Group's environmental, social and governance performance.



Glossary of terms and definitions

GLOSSARY

Tangible assets: The sum of the carrying amounts of the fixed assets recognised on the balance sheets of all of the companies included in the scope in each tax jurisdiction. It does not include cash, cash equivalents, intangible assets or financial assets.

Profit before tax (PBT): Profit after deducting all expenses incurred except for income tax.

BEPS: Base Erosion and Profit Shifting. BEPS refers to tax planning strategies that exploit gaps and mismatches in tax rules to artificially shift profits to low or no-tax locations where there is little or no economic activity or to erode tax bases.

Stated capital: the nominal capital comprising a company's equity.

Stakeholder: An entity or individual who could be significantly affected by the activities, products and services of the reporting organisation or whose actions could affect the company's ability to execute its strategies successfully and achieve its targets. Stakeholders include groups devoted to the organisation (employees and shareholders) and others with different types of relationship (workers that are not employees, suppliers, vulnerable groups, local communities, NGOs and other civil society organisations, among others).

IBEX 35: Spain's blue chip stock index, managed by BME. It is made up of the 35 most liquid companies traded on the Spanish stock markets.

IFRS: International Financial Reporting Standards. The international accounting standards issued by the International Accounting Standards Board (IASB), stipulating the requirements for recognising, measuring, presenting and disclosing the transactions and economic events that affect a company and are reflected in its financial statements.

Income tax accrued: The sum of current tax (i.e., for the current year) on taxable income for the reporting period for all of the entities included in the scope in each tax jurisdiction, regardless of whether they have been settled.

Income tax paid: The sum of income tax paid in the reporting period by all the entities included in the scope in each tax jurisdiction, regardless of whether they relate to the current year.

Third party revenues: The sum of revenues generated by third parties across the entities included in the scope in each tax jurisdiction in the reporting period. Revenues is defined in the broadest sense to include all income, including gains on non-recurring transactions. Related party revenues: The sum of revenue during the reporting period from transactions carried out between entities within the scope that are resident in different jurisdictions, including income from non-recurring transactions but excluding dividends, portfolio impairment losses and the share of profits of associates. Tax jurisdiction: Country or territory with autonomous tax collection powers similar to those of a country.

SDG: Sustainable Development Goals. A series of 17 Goals ratified by the United Nations in 2015 as a universal call to action to end poverty, protect the planet and ensure that by 2030 everyone can live in peace and prosperity.

OECD: Organisation for Economic Co-operation and Development. International cooperation organisation made up of 38 member states with the aim of coordinating their economic and social policies.

Tax havens: To determine which tax jurisdictions lend themselves to classification as tax havens, low-tax territories or non-cooperative jurisdictions, CIE Automotive uses the tax haven definition provided in article 529.3 of Spain's Corporate Enterprises Act and the European Union's list of non-cooperative jurisdictions for tax purposes. Tier 1: Tier 1 suppliers develop solutions for incorporation into finished vehicles without major modification.

Effective tax rate (ETR): The ratio of the tax expense accounted for in the statement of profit or loss (including current tax, any provisions for tax liabilities that are not yet certain as to their amount or existence, adjustments in respect of prior-year taxes and changes in deferred tax assets and liabilities) over profit before tax.

CIE Automotive Nominal: Nominal tax rate. Application of the statutory rate to profit before tax in each jurisdiction yields theoretical tax expense, which when expressed over consolidated profit before tax provides a snapshot of CIE Automotive's average nominal tax rate.

CIE Automotive Effective: CIE Automotive's global effective tax rate is arrived at by dividing consolidated accrued tax over consolidated taxable income from the activities of all of the companies comprising the scope and the countries where it operates.



COUNTRY-BY-COUNTRY REPORT DEFINITIONS

Scope and list of constituent entities and their main activities

CIE Automotive operates more than 20 tax jurisdictions through a network of over 130 corporate enterprises. The Country-by-Country (CbC) Report presents an overall snapshot of the financial data of the entities that are fully consolidated and therefore excludes information pertaining to investees that classify as joint arrangements or associates for consolidation purposes.

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

The full list of subsidiaries, joint arrangements and associates, along with details about their activities and locations, is provided as an appendix to the Group's consolidated financial statements.

The CbC report is prepared using the same figures as CIE Automotive's consolidated financial statements, specifically using the separate financial statements for 2025 for each Group company, prepared in accordance with the 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 CIE Automotive'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 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 financial statements 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 and year-end headcount for 2025, following IFRS criteria.

Tangible assets

This is the sum of fixed assets recognised within property, plant and equipment and inventories, as well as inventory balances, excluding cash and cash equivalents.



Self-assessment (Country-by-Country Report and GRI 207)

COUNTRY-BY-COUNTRY REPORT SELF-ASSESSMENT

In line with its commitments around tax matters, CIE Automotive has updated the 2025 tax performance self-assessment it carries out using the model known as the Tax Responsibility Thermometer compiled by the Alliance for Fiscal Responsibility working group.

Using that tool, the Group systematically analyses its tax contribution and its level of tax responsibility, benchmarking its results against the indicators and best practices defined in that model with a view to identifying opportunities for improvement and reinforcing its leadership in responsible and sustainable taxation.

Dimension	Ratio	Tax Responsibility scale				CIE Automotive
		ADEQUATE	ACCEPTABLE	IMPROVABLE	DEFICIENT	
Tax contribution and geographical distribution	1. Effective rate (global, 3-year average)	>20%	15%-20%	10%-15%	<10%	ADEQUATE
	2. Effective rate as % of average nominal rate (global, 3-year average)	>90%	75%-90%	50%-75%	<50%	ACCEPTABLE
	3. Turnover (in tax controversial territories as % of total)	0%-10%	10%-20%	20%-30%	>30%	ADEQUATE
	4. Profits (in tax controversial territories as % of total)	0%-10%	10%-20%	20%-30%	>30%	ADEQUATE
Location of profits	5. Profitability (in tax controversial territories as % of other countries)	<1.5x	1.5x-2x	2x-3x	>3x	ADEQUATE
	6. Profits per employee (in tax controversial territories as % of other countries)	<2x	2x-2.5x	2.5x-3x	>3x	ADEQUATE
	7. Return on assets (in tax controversial territories as % of other countries)	<1.5x	1.5x-2x	2x-3x	>3x	ADEQUATE
Economic substance	8. Productivity per employee (in tax controversial territories as % of other countries)	<1.5x	1.5x-2x	2x-3x	>3x	ADEQUATE
	9. Turnover over assets (in tax controversial territories as % of other countries)	<1.5x	1.5x-2x	2x-3x	>3x	ADEQUATE
	10. Employees per subsidiary (in tax controversial territories as % of other countries)	<2x	2x-4x	4x-6x	>6x	ADEQUATE



DATA SOURCE

The data used to calculate these ratios come from the CbC Report template.

To assess the effective tax rates, for consistency purposes, we used the same methodology as is used in the Tax Transparency Report, defined above.

COUNTRY CLASSIFICATION

- Tax controversial territories: reflects the calculation of each concept for all countries and territories considered tax controversial territories according to the definition provided in the Corporate Tax Responsibility Thermometer. At CIE Automotive, they are currently limited to its reduced presence in the Netherlands.
- Other countries: reflects the calculation of each concept for all countries that are not tax havens or tax controversial territories.
- Total: reflects the calculation of the total for all countries.

The full description of the Thermometer is available at www.oxfamintermon.org





GRI 207 cross-reference table

CIE Automotive's unwavering commitment to adopting best practices in responsible and transparent tax management translates into voluntary alignment with the most prestigious international standards and recommendations.

To this end, the Group carries out an annual self-assessment, the outcome of which evidences its strong compliance with the Global Reporting Initiative's Topic Standard for Tax (GRI 207), which it implemented for the first time in 2021.

Below is a description of the key elements of our management approach, along with the other topic-specific disclosures defined in GRI 207 and an account of how we implement the standard in practice at CIE Automotive.



CONTENTS REGARDING THE MANAGEMENT APPROACH

	Disclosure	Guidance	Check	Evidence of compliance by CIE Automotive
207-1 Fiscal approach	Tax strategy.	Existence of a public tax strategy applicable to all companies and employees of a Group.	✔	The CIE Automotive Group has publicly and accessible on the corporate website the group's Tax Policy promoting its dissemination within the group at all levels and geographies.
	Fiscal Strategy Review Body.	Involvement of the Board of Directors in the approval and periodic monitoring of Fiscal Policies.	✔	The Governing Bodies play a fundamental role in fiscal matters. In the group, the Board of Directors approves the Fiscal Policy and oversees the execution of the strategy and the management of fiscal risks together with the Audit and Compliance Committee on an annual basis.
	Compliance approach.	Commitment to regulatory compliance.	✔	One of the principles on which the group's fiscal performance is based is legality and integrity, governed by strict compliance with tax regulations in each of the countries in which it carries out its activity, through the payment of taxes that are payable in accordance with the legal system.
	Relationship between the tax approach, business strategy and sustainable development.	Alignment of the Fiscal Policy and Strategy with the reality of the business and the commitment to sustainability.	✔	Having understood that taxation has also become a sustainability issue for many stakeholders, CIE Automotive ensures that it carries out sustainable tax management based on the principles of good practice and aligned with the development of its business. All this is thus defined in the corporate tax policy published on the corporate website.
207-2 Tax governance, control and risk management	Responsible body for compliance with the tax strategy.	Identify the highest governing body in charge of reviewing the fiscal strategy.	✔	The Board of Directors is the governing body in charge of approving the Fiscal Policy of CIE Automotive which contains the fiscal strategy. The execution and monitoring of the tax strategy is subject to supervision together with the Audit and Compliance Committee.
	Tax strategy in the organization.	Description of the processes, projects, programmes and initiatives that support tax strategy and procedures.	✔	The integration of the tax approach in CIE Automotive is governed by an orderly regulatory management model composed of policies, standards (global and specific), internal procedures and standardized processes, all subject to the guidelines of the Code of Ethics and Conduct, aimed at mitigating the most relevant tax risks.
	Tax risk management.	Identification, management and supervision of tax risks.	✔	The management of fiscal risks in CIE Automotive, is integrated into the Risk Control and Management Policy, within the Corporate Governance policies. Likewise, the group has internal processes, systems and internal controls in order to mitigate risks. The group publishes annually the Report of the Internal Control System of Financial Information (ICFR), which validates the controls associated with fiscal processes subject to systematic internal and external audits. ICFR controls are subject to continuous supervision by the Audit and Control Committee and the group's Board of Directors and follow-up by the Internal Control Management and the Audit Management. The rules and procedures are reviewed by the General Management with the aim of ensuring the integrity, homogeneity, validity, availability and accessibility of the Company's internal regulatory documents, as well as facilitating the management through the established channels and their approval at the appropriate level.
	Reporting channels.	Mechanisms for reporting unethical or illegal conduct as a mechanism for interest groups.	✔	On the CIE Automotive corporate website, a complaints channel is available where any employee or third party can communicate anonymously and confidentially any indication or possible breach of the Code of Ethics and Conduct. To reinforce the commitment to an ethical code of conduct, training actions are carried out on a recurring basis on this code of ethics and conduct, criminal responsibility, fraud and corruption.
	Compliance with tax governance and the control framework.	Explanation of the tax governance compliance assessment process.	✔	CIE Automotive supervises, checks, and maintains the tax governance and control framework. CIE Automotive relies on both internal and external auditors for the annual review of compliance with tax governance and the control framework.



TOPIC DISCLOSURES

	Disclosure	Guidance	Check	Evidence of compliance by CIE Automotive
207-3 Stakeholder engagement and management of tax concerns	Commitment to tax authorities.	Cooperative relations with tax administrations.	✔	Adherence and application of the Spanish Code of Good Tax Practices. Voluntary publication of the Tax Contribution Report. CIE Automotive not only provides the necessary information, but also requests in advance recommendations and indications from the relevant regulatory bodies for each relevant tax operation it carries out. Presentation of previous tax proposals to the competent administration in those operations with potential relevant tax impact. Participation in the Joint Forum for the Permanent Relationship with the Bizkaia Tax Authority.
	Consideration and participation of the views of internal and external stakeholders.	Public positioning on tax issues and active participation in forums/platforms to manage the regulatory environment.	✔	The CIE Automotive Group, in its search for transparency, presents its point of view on taxation policies. Subscription in various platforms of multinational companies where they expose and interact with stakeholders on the continuous changes that occur in the fiscal field (member of the Cluster of Transparency, Integrity and Good Governance created by the business platform Forética). Affiliation to different newsletters where it is kept up to date. Participation in webinars in order to resolve possible interpretations of the tax environment.
207-4 Country-by-Country reporting	Tax jurisdictions of group entities.	Complete information at the level of tax jurisdiction, referring to the place where they are resident for tax purposes.	✔	Publication of the Country-by-Country Report. Description of companies in disputed territories and included in the corporate tax liability thermometer (with an “Adequate” valuation, the maximum in the barometer).
	Entity names.	Detailed list of entities resident in each tax jurisdiction.	✔	Information included in the Country-by-Country Report and Consolidation Annual Accounts.
	Main activity.	General description of the activity carried out by the Group in each jurisdiction.	✔	Information included in the Country-by-Country Report and Consolidation Annual Accounts.
	Employees.	Number of employees and the calculation used.	✔	Information included in the Country-by-Country Report and Consolidation Annual Accounts.
	Revenue.	Income from transactions with third parties and related parties in case of belonging to a different jurisdiction.	✔	Information included in the Country-by-Country Report and this Tax Contribution Report.
	Profit/loss before tax.	Criterion followed to determine the consolidated gain/loss attributable to each jurisdiction.	✔	Information included in the Country-by-Country Report and annex to this Tax Contribution Report.
	Tangible assets other than cash and cash equivalents.	Criterion followed to determine the volume of assets attributable to each jurisdiction.	✔	Information included in the Country-by-Country Report and annex to this Tax Contribution Report.



TOPIC DISCLOSURES

207-4
Country-by-Country reporting

Disclosure	Guidance	Check	Evidence of compliance by CIE Automotive
Corporate income tax paid by cash criterion. Corporate taxes accrued in profit/loss.	Criterion used to determine the tax paid and its imputation to other tax jurisdictions.	✔	Information included in Country-by-Country Report and in this Tax Contribution Report.
Nominal vs. Accrual IS Reconciliation.	Nominal vs effective IS reconciliation.	✔	Information included in Country-by-Country Report and Consolidated Annual Accounts.
Reference exercise.	Preference for providing contemporaneous information of the CbC (same exercise / period as that of the public information in Annual Accounts). Otherwise, specify the reason.	✔	It does not differ.
Employee remuneration.	Inclusion of information on remuneration costs as an indicator of the value generated in a jurisdiction.	✔	The Annual Report contains information on the average remuneration by jurisdiction.
Employee withholdings.	Inclusion of information on remuneration costs as an indicator of the value generated in a jurisdiction.	✔	Included in the Tax Contribution Report.
Taxes collected.	Disaggregated information on taxes collected (by jurisdiction and type).	✔	Included in the Tax Contribution Report.
Other payments to governments.	Description of other taxes or tax figures supported/collected by jurisdiction.	✔	Included in the Tax Contribution Report.
Uncertain fiscal positions.	Description of the main litigations of a tax nature and quantification of their impact.	✔	Included in the Consolidated Annual Accounts.



Global Tax Contribution Report 2025

CIE Automotive

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