



Tax Strategy

Gestamp Automoción, S.A.

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1. Our principles and values in tax related matters

Gestamp's corporate culture is mainly focused on making our company the most recognized automotive supplier for its capacity to adapt its business towards the value creation for its clients, whilst keeping a sustainable economic and social development.

With this goal in mind, the safety of our clients, suppliers, employees and shareholders is also one of our major objectives, hence, our tax strategy is soundly built on the basis of our commitment with the national and international tax regulations in force at any given time.

At the same time, at Gestamp we are aware of the importance and need of the positive contribution to the public finances of the different territories in which we operate and of the transcendence of our social contribution, therefrom, we have established a clear and precise view of our social contributory responsibility.

On this basis, the principles and values that inspire and govern our tax strategy could be summarized around four basic pillars:

1. **RESPONSABILITY:**

At Gestamp, our tax strategy is considered an area of special prominence as it must be perfectly aligned with the basic principles of our business strategy but, at the same time, it constitutes an essential part of our concerns in the framework of our sustainability policy.

Within this framework, all decisions and actions of our group on tax matters operate under the fundamental principles of integrity, coherence, consistency and total respect to the applicable regulations.

It is also important to underline that all transactions with related parties are carried out on arms-length terms, and under the principles of free competition and the right balance between risks assumed and profits obtained. These transactions are all identified in our annual accounts, according to the applicable national and international regulations and they are all justified in our transfer pricing documentation, both at local and at Group level.

At Gestamp before making any decision, we always try to assess its tax implication, identifying where the value is generated, knowing that the operation will imply the payment of the relevant taxes according to the jurisdictions involved and basing such decisions on real and valid economic reasons and business purposes that fully justify them.

Furthermore, our tax policy must be considered as conservative and prudent, and always within the general rule of reasonable interpretation of the applicable tax regulations in every particular case.

In this regard, it should be noted that, from a Group perspective, we have had and want to keep a significantly low litigation profile on tax matters, confirming the level of responsibility of our tax management and delivering a high degree of security to all our agents.

2. **CONTRIBUTION:**

Gestamp always links its economic and business activity to the payment of taxes so that, where the activity is undertaken and where value is generated, the relevant taxes are paid according to the regulation in force in the relevant jurisdiction.

Under no circumstance is our objective to offshore income to certain jurisdictions exclusively based on a tax motivation.

Gestamp is not present in any territory that might be classified as a tax haven or a non-cooperative jurisdiction for tax purposes¹ other than Samoa, where our presence is limited to a sixty percent shareholding in a holding entity in Taiwan, which is the parent company of a holding company in Samoa and this, in turn, is the parent company of a Chinese subsidiary that operates a productive plant in China to supply local clients. The remaining forty percent shareholding belongs to a third-party partner whose Taiwanese nationality precisely imposes the location of the referred holding entity as direct investments from Taiwan in China are not possible.

3. **TRANSPARENCY:**

At Gestamp we have a clear commitment towards transparency on tax matters.

Accordingly, given the prudence and responsibility that governs our tax management, at Gestamp we always strive for the maximum transparency providing at all times clear and truthful information to our shareholders, to the market and to all our stakeholders.

4. **COOPERATION:**

Gestamp is in the process of formalizing its adherence to the Code of Good Tax Practices driven by the Spanish State Tax Administration Agency (AEAT). However, Gestamp is currently not a party to the Large Business Forum organized by the AEAT due to its access mechanism procedures.

¹ Data updated as of 30 September 2022

In any case, given the importance of our Group as well as the relevance of our activity and sector, Gestamp is always willing to participate in any initiative whose purpose is to promote, from solid values of professionalism, collaboration, good faith, mutual confidence and reciprocal respect, a cooperative relationship and a constructive dialogue with the different public administrations of the countries where we have operations and an industrial presence.

2. Management and control systems

At Gestamp, tax matters are managed in an orderly and professional manner to guarantee both duly and timely compliance with all tax obligations and the effective management of tax risks.

For this purpose, Gestamp, on the one hand, has an adequate, expert and integrated organization with sufficient technical competence at a corporate, divisional and local level, which allows us to manage and ensure compliance with our tax policies and, on the other hand, the procedures, systems and internal controls applied are the most effective to ensure that the fiscal function is developed in a proper manner.

The competent and responsible bodies at Gestamp in tax matters are the Board of Directors, the Audit Committee, the Risk Committee, the Tax Area of the Legal and Tax Department and the Internal Audit and Risk Management Department.

In particular, the Tax Area of the Legal and Tax Department is responsible for preserving and developing all the principles and values of Gestamp in tax matters and for controlling the compliance with these principles and values at the group level, defining and establishing the necessary mechanisms to achieve that goal. Likewise, the group Tax Area also provides information on tax risks and their management to the Internal Audit and Risk Management Department.

Moreover, the Internal Audit and Risk Management Department conducts continuous monitoring of fiscal risks, including them into the Comprehensive Risk Management System of Gestamp and, in particular, in the Risks Map, and informs of tax related risks to the Audit Committee.