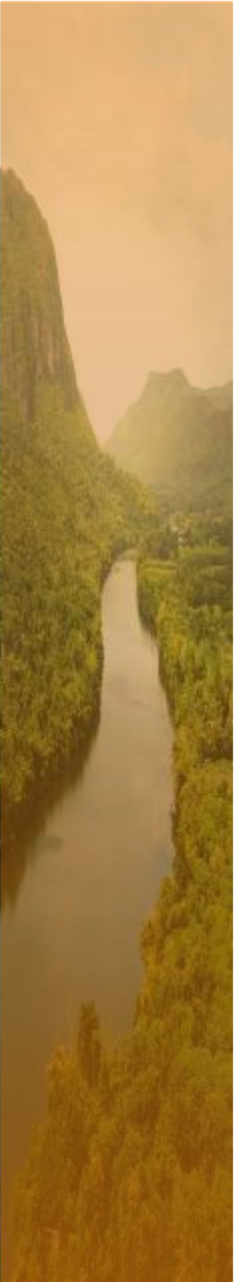
CIE Automotive

COUNTRY BY COUNTRY REPORT 2025



The Country-by-Country Report (CbCR) is a financial report which large multinational enterprises must present to the tax authorities of the countries where they operate.

Its main purpose is to provide a clear and detailed account of their activities worldwide, broken down by each country where they have a presence. It is one of the initiatives recommended by the Organization for Economic Co-operation and Development (OECD) for combating tax evasion and aggressive tax planning.

More specifically, its implementation stems from the recommendations made in the Base Erosion and Profit Shifting (BEPS) Plan, a host of measures designed to prevent companies from manipulating their tax structures and minimizing their tax bases by means of transfer pricing or other artificial tax mechanisms. It provides country-by-country disclosures for revenues, taxes borne, employees and tangible assets.

Its goals and benefits can be summed up as follows:

COUNTRY BY COUNTRY GOALS

Tax transparency

It provides the tax authorities with a clear account of organizations' economic and tax activities in each jurisdiction, so helping detect possible tax evasion risks

Better audits and compliance

It enables and facilitates more effective comparisons between companies' financial information ensuring that multinational enterprises are not shifting profits to countries with low or no taxes by means of transfer pricing or other aggressive tax practices.

Tax justice

By providing fuller accounts of their revenues, taxes and activities, enterprises are encouraged to become more transparent and comply with applicable tax regulations in a fair way in every country where they do business.

Stronger international cooperation

Since multinationals operate in several countries, this reporting effort facilitates cooperation among tax authorities from different jurisdictions, paving the way for more exhaustive analysis of global tax structures.

In other words, the **Country-by-Country Report** is a key tool in the international taxation field, one that is designed to improve tax transparency and justice at large corporate groups, helping prevent the abuse of tax systems and guaranteeing that taxes are paid as intended in each jurisdiction

Evolution of requirements towards transparency

2013:
BEPS AND OCDE

2016:
Transposition of BEPS regulations

2017:
Adoption of EU Directive 2016/881

2022:
Transposition of EU Directive 2021/2101

2025:
Bizkaia NFIS 6/2025

BEPS INITIATIVE

BEPS (**Base Erosion and Profit Shifting)** initiative was launched by the OECD in 2013, with the aim to ensure that companies pay taxes where their profits and activities are genuinely generated, preventing an aggressive tax planning that can lead to tax evasion.

OBLIGATION TO SUBMIT COUNTRY-BY-COUNTRY REPORT

Spain adopts the OCDE's BEPS regulations to ensure **tax transparency** globally and implements the obligation to submit **Country-by-Country Report** for multinational groups with revenues over 750 million euros.
The Country-by-Country Report must be submitted to the Tax Agency within 12 months of the group's fiscal year-end, using Form 231.

TAX COOPERATION BETWEEN EU COUNTRIES

Spain adopts **European Directive 2016/881** , which requires that **Country-by-Country Reports must be shared** among tax authorities in EU member states, promoting the tax transparency and allowing countries to compare information to detect possible evasive practices.

OBLIGATION TO PUBLIC DISCLOSE OF COUNTRY-BY-COUNTRY INFORMATION

In 2022, Spain transposes **European Directive 2021/2101,** which requires multinational companies to **publicly disclose Country-by-Country information.**
The new legislation applicable to fiscal years beginning on or after 22 June 2024, requires multinational companies to publish tax information, in an accessible manner on the website of the obligated entity and to file it with the Commercial Registry together with the annual accounts, which must be updated annually, within six months from the end of the fiscal year.
This measure enhances tax transparency and has the aim to detect the practice of shifting profits to countries with low taxes.

COMPLEMENTARY TAX

Bizkaia transposes **European Directive 2022/2523** through NFIS 4/2024 and definitively approves it under NFIS 6/2025, which introduces the **complementary tax** as an additional measure to ensure that multinational groups are taxed properly, with the aim that **large groups pay a global minimum tax rate**, reducing the possibility of choosing locations with low tax rates.
This measure that strengthens international tax policy is closely linked to the implementation of Country-by-Country reports and efforts to combat tax evasion.

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 Autocam
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

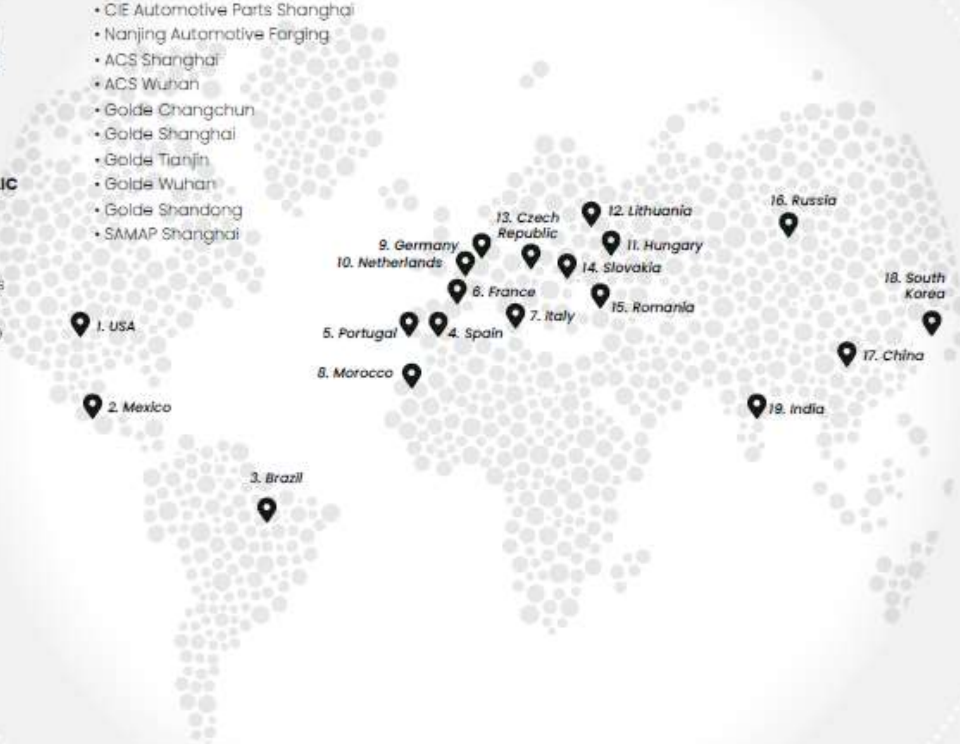
13. CZECH REPUBLIC
- CIE Zdanice
- CIE Metal CZ
- CIE Plasty
- CIE Unitools Press
- CIE Praga Louny

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

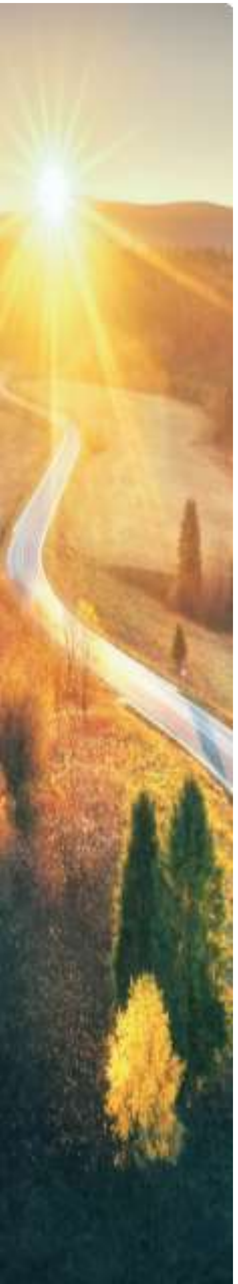


18. SOUTH KOREA
- Roof Systems Korea

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

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**

The data in the table above correspond to information for the 2025 financial year and will be submitted to the administration in the corresponding form 231. These figures may vary if new OECD guidelines or recommendations are published for the preparation of the Country-by-Country Report after the publication of this report, but before the deadline for submitting the form to the Tax Agency. The section "Report definitions" includes a summary of the definitions and considerations taken for the preparation of the Country-by-Country Report.



Scope and list of constituent entities and their main activities

CIE Automotive operates in a total 23 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.

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.

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.

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 recognized within property, plant and equipment and inventories.

Country by Country Report 2025

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