



FCA Tax Strategy

Introduction

FCA NV and its controlled subsidiaries (collectively, the “Group”) is committed to managing its business responsibly through a strong, group-wide commitment to the highest standards of integrity, accountability and transparency. This commitment is also incorporated in the principles and rules governing tax processes and management as defined in the Group Tax Strategy.

Group Tax Strategy

The Group has adopted the Group Tax Strategy (the “Tax Strategy”) and supporting Policies to ensure that Tax Compliance, Tax Planning and Tax Risks are effectively and consistently managed at the Regional, Sector and Group levels. Governance within the Group’s tax organization is structured to effectively and fully support the Group’s Tax Strategy. The Tax Strategy is guided by the primary consideration that all material tax positions taken by the Group must comply with applicable laws and regulations and with the core principles that define the Group’s relationships with its main stakeholders and govern how it conducts its business activities.

Tax Compliance

The Group is committed to fulfilling all fiscal obligations in administering and paying all required taxes. We remain compliant with the tax law in the jurisdictions in which the Group operates and international standards where applicable. Cross-border transactions between members of the Group are conducted on an arms-length basis in accordance with applicable laws and regulations including OECD¹ Guidelines where applicable.

Tax Planning

The Group is structured and operates in the most tax efficient manner and any transaction entered into must have a valid business purpose or rationale before implementation. In making commercial decisions we take tax into account in the same way as any other cost. Where there is more than one way of structuring a commercial business arrangement, we take a holistic view, considering all factors including tax. We may implement an alternative with a lower tax cost, provided it is compliant with the laws and relevant regulations in the applicable jurisdiction.

Relationship with Tax Authorities

The Group’s policy is to maintain an open, honest and transparent relationship in all dealings with tax authorities and other relevant government bodies in the jurisdictions in which we operate. The Group

¹ Organisation for Economic Co-operation and Development



recognizes that there will be areas of differing legal interpretations with the tax authorities at times and where this occurs, we will engage in proactive discussions to resolve any such issues as quickly as possible. If we are unable to resolve any such differing interpretations of law, we may initiate legal proceedings but only if supported by competent and sufficiently supportable legal opinions.

Tax Risk Management

The Group only takes tax positions that are appropriately supported by relevant law. If the relevant law is unclear, FCA will obtain opinions from outside advisors to clarify and support the position. In any case, all information will be clearly presented to the tax authorities or other relevant bodies for approval. The Group follows best practice and has adopted the COSO² framework as the basis for the Group's Tax Internal Control framework. Accordingly, the Group has a system of tax risk controls, which establishes specific procedures for managing tax risks identified by the Group's tax department as material and intrinsic to the Group's business operations.

Governance

The Group Vice President of Tax is responsible for centralized coordination and management of the Tax Strategy and for ensuring that the Group complies with all fiscal obligations for administering and paying all applicable taxes. These responsibilities are achieved through a dedicated Group tax structure of Regional Heads and Sector Heads of Tax who manage all tax-related matters at the Group level and within each of the Business Operating segments and Service companies, which are clearly defined and regularly updated.

The publication of the following tax strategy is in accordance with the requirements of Paragraph 16(2), Schedule 19, Finance Act 2016 for the financial year ending 31 December 2019

Issued in December, 2019

² Committee of Sponsoring Organizations of the Treadway Commission