



Marelli – UK Tax Strategy

Overview

This document describes Marelli's UK tax strategy. This strategy has been prepared in compliance with the requirements of section 161 and Schedule 19 of the Finance Act 2016.

This strategy applies to the Marelli companies that are based in the UK, which are ultimately for 100% owned by Marelli Holding based in Japan. Marelli has the following companies in the UK (hereinafter: the Group):

- Marelli Automotive Systems Europe plc.;
- Marelli Automotive Systems UK Limited;
- Automotive Lighting UK Limited.

Our objective is to manage the UK tax matters of the Group in accordance with applicable laws and Marelli's Code of Conduct, which defines the Group's relationship with its stakeholders and governs how it conducts its business.

Tax Governance

The day-to-day tax management of the Group tax affairs is the responsibility of the UK Finance Manager with support of the Marelli Tax Team and external tax advisors. The support of the internal tax team in combination with external tax advisor ensures proper review. All material UK tax matters are brought to the attention of the EMEA Head of Tax and/or the Global Head of Tax by the UK Finance Manager.

Tax strategy and policies are reviewed on an on-going basis by the directors of the Group. This Strategy is reviewed and approved by the Group directors.

Risk and tax planning

The Group aims to minimize tax risks. In managing its tax affairs, the Group will fully comply with the UK tax legislation and strive to prepare and file timely and accurate tax returns and make tax payments in time.

The Group strives to be efficient and deliver long-term value to its stakeholders. It considers planning options that are consistent with the overall business objectives and tax strategy of the Group and it complies with the letter and spirit of UK tax law. This includes claiming available tax incentives and exemptions.



Relationship with HMRC

The Group is committed to acting with integrity and transparency in all UK tax matters. An important part is the maintenance and development of a strong, proactive working relationship with HMRC. We are committed to dealing openly and transparently with HMRC and significant business transactions related to the Group will be actively communicated with HMRC.