



Lear Corporation United Kingdom Tax Strategy

Introduction

Lear Corporation and its subsidiaries and affiliates (collectively “Lear”) have a substantial presence in many countries around the world and pay a significant amount of various taxes and contributions that are levied on both a federal and municipal level.

Given its global footprint, Lear ensures that its overall approach to tax is aligned with its core values and overall strategy, hence it is strongly committed to be a responsible, reliable and respected taxpayer that is transparent on all tax matters, acting fairly, responsibly and with the highest level of integrity in all relations with tax authorities.

At the same time, it is very well recognized within Lear, that the company has a responsibility to maintain strict compliance with its tax obligations in all the jurisdictions in which Lear operates, in accordance with the requirements levied by applicable laws and regulations.

Transfer Pricing, Tax Transparency and Tax Planning

Lear’s transfer pricing policy is based on the OECD arm’s length principle supported by economic analysis and reports. In addition, Lear implemented OECD’s country-by-country reporting (“CBCR”) in conjunction with the Base Erosion and Profit Shifting (BEPS) initiative.

In structuring our business activities, in line with our Code of Business Conduct and Ethics we abide by the tax laws (as well as all other relevant regulatory or administrative guidance) in all countries in which we operate. We will take steps to take advantage of reliefs and incentives so long as they comply with tax legislation. We would take into consideration the likelihood of challenge from tax authorities including Her Majesty’s Revenue and Customs (“HMRC”) in the UK and whether our position is defensible. Any structuring that is undertaken will be consistent with the commercial and economic substance and will be consistent with our core values and overall strategy. We do not put in place any arrangements that are contrived or artificial.

We obtain advice from appropriately qualified external advisors on specialized UK and non-UK tax matters, for example, as part of our tax return process. We seek the input of external advisers as a key source of specific tax expertise to supplement the skills of our own finance and tax teams in appropriate cases to mitigate risk.

Governance and Tax Risk Management

Our Board of Directors provides leadership with respect to our approach in conducting our business matters, including taxation, in accordance with our core values and overall strategy.

Lear maintains a continual application of tax governance with strong internal controls in order to substantially reduce tax risk to a materially acceptable level. Key tax policies are achieved through robust procedures that are embedded into Lear's corporate policies.

In line with the above, Lear developed internal controls to reinforce the accuracy and completeness of data to support our tax compliance. Such processes and internal controls are documented and are subject to regular reviews by internal and external audits.

The application of these policies is reinforced by compliance with Sarbanes-Oxley ("SOX") requirements as applicable for a publicly listed company in the United States.

Cooperation with Tax Authorities

Lear fosters an atmosphere that promotes transparency, cooperation and communication with tax authorities, including HMRC in the UK, for issues to be reported, disclosed and managed on a timely basis.

We seek to minimize the risk of a dispute with the taxing authorities by being open and transparent about our tax affairs and submitting necessary information to tax authorities in a timely manner.

Any inquiries raised by tax authorities are answered on a timely basis and with proper diligence. Any errors or mistakes in tax returns are fully disclosed as soon as practicable.

This document is intended to satisfy the obligations on behalf of all qualifying entities in Lear Corporation, pursuant to Paragraph 19(2) and Part 2, Schedule 19, Finance Act 2016. This is reviewed annually and updated as appropriate and was last published on September 30, 2020.