

Walker Limited

In compliance with section 161 and section 19(2) of schedule 19 Finance Act 2016, the company is publishing its tax strategy for the year ended 31 December 2021. As the designated holding company of the U.K group we confirm that this strategy will apply to the following UK companies:

Tenneco Automotive UK Limited

Tenneco Management (Europe) Limited

F-M Motorparts Limited

Tenneco Walker UK Limited

Federal-Mogul Global Growth Limited

Federal-Mogul Limited

F-M Trademarks Limited

Piston Rings (UK) Limited

Federal-Mogul Engineering Limited

FDML Holdings Limited

Federal-Mogul Technology Limited

Federal-Mogul Controlled Power Limited

AE International Limited

Federal-Mogul UK Investments Limited

Federal-Mogul Asia Investments Limited

Federal-Mogul Valvetrain Limited

Federal-Mogul UK Powertrain Limited

Responsibility and Governance

The company has a culture of compliance throughout its business seeking to operate within all legal and statutory requirements. Furthermore, the company's shared values encourage ethical behaviour throughout the organisation.

Our **tax strategy** is:

- Meet all legal requirements and to make all appropriate tax returns and tax payments in accordance with deadlines.
- Seek to utilise available tax reliefs and incentives where available in a manner which is consistent with the government's fiscal policy.
- Consider the tax impact in major or complex business decisions.
- Seek advice from tax professionals on major or complex business decisions.
- Comply with appropriate tax risk processes and ensure there is Board oversight into this compliance

Risk management and governance arrangements

The business has a positive view towards tax compliance and actively reviews areas of the business assessing the risks and seeking solutions with the aid of external professionals. Strategies are put in place and followed up to ensure that the company fulfils its tax filing and payment obligations.

Tax planning

Our activities centre on an approach designed to ensure compliance with all relevant and applicable tax rules. We undertake tax planning as part of our business activities seeking professional advice where required. We do not undertake aggressive tax planning, the sole purpose for which would be obtaining a tax advantage.

Relationship with HM Revenue and Customs (HMRC)

Our compliance culture requires us to have a positive relationship with HMRC focusing compliance and cooperation, which includes timely filing and payments.

We employ the services of tax professionals to act as our agents, and in a number of cases liaise with HMRC on our behalf. We have also employed a tax manager for the UK to work with the finance teams and professional advisors.