

2022 Required Documentation Regarding United Kingdom Tax Strategy for American Axle & Manufacturing Holdings, Inc. & Subsidiaries (AAM)

AAM has a group tax strategy and this document indicates how the relevant parts of that group strategy apply in the context of United Kingdom (UK) tax matters and obligations. This document is in response to the requirements of Schedule 19 Finance Act 2016.

The UK entities covered by this strategy are:

- Albion Automotive (Holdings) Limited
- Albion Automotive Limited
- Metaldyne International (UK) Ltd.

The approach of the group to risk management and governance arrangements in relation to UK taxation

Generally, AAM tax compliance activities are performed at the local country level for non-US income taxes, including UK taxes. United States (US) income tax activities and global tax management and tax planning is centralized in the US. AAM generally uses a variety of tax advisors to assist in tax planning and in tax compliance when and where required, including in the UK.

AAM Attitude to Tax Planning

The AAM group (including its UK companies) pays taxes in accordance with the applicable local country tax laws. AAM strives to streamline its entity structure to allow for tax efficient movement of cash world-wide. This planning strategy is important to AAM because our business is capital intensive. Cash is required to be moved among entities from time to time to fund capital investment for new product programs. AAM uses various tax advisors in its tax planning activities to ensure AAM is aware of and complies with local laws and tax requirements.

AAM takes advantage of incentive programs such as tax holidays, grants, and tax abatements to maintain cost competitiveness globally. AAM currently has no such incentive program in place in its UK operations.

Managing Tax Risk

AAM's world-wide tax strategies are periodically evaluated by the AAM centralized tax management team along with our tax advisors. Significant tax strategies are reviewed by AAM's Board of Directors. In addition, as local country tax laws change, we re-evaluate local country tax risks and modify our tax planning and strategies in order to maintain compliance with global tax law requirements.

Tax risks and exposures are reviewed with AAM's Chief Financial Officer on a quarterly basis.

AAM has a robust self-assessment internal control process in which controls testing is performed quarterly to ensure AAM is in compliance with its tax compliance and reporting activities world-wide. This process enables AAM to effectively monitor tax risk.

AAM does not view its UK subsidiaries as high risk from a tax perspective.

Working with HM Revenue & Customs (HMRC)

AAM's policy is to develop trustworthy and effective working relationships with all Tax Authorities globally. Generally, this policy has been working as desired and has created a positive working relationship whereby issues tend to be resolved with less controversy at the field level and in a time-efficient manner.

Over the years, AAM's UK subsidiaries have not been subject to many audits. Our personnel therefore do not have a well-developed working relationship with the HMRC. However, AAM believes that any future relationship with HMRC will be positive, trustworthy and transparent just as it is with other country Tax Authorities.