

# Risks and uncertainties

## FCA

Risks related to the Group's business, strategy and operations

FCA- If vehicle shipment volumes deteriorate, particularly shipments of the Group's pickup trucks and larger SUVs. As is typical for an automotive manufacturer, the Group has significant fixed costs and, therefore, changes in vehicle shipment volumes can have a significant impact on profitability. Further, profitability in the U.S., Canada, Mexico and Caribbean islands (NAFTA), a region which contributed significantly to the Group's revenue in 2018. The Group's dependence within the NAFTA region on pickup trucks and larger SUVs remained high in 2018 as well. Moreover, the Group tends to operate with negative working capital as it generally receives payment for vehicle shipments before the vehicles are shipped. FCA - The Group's businesses are affected by global financial markets and general economic and other conditions. The Group's results of operations and financial position may be influenced by various macroeconomic factors. In general, the automotive sector has historically been subject to highly cyclical demand and tends to reflect the general economic conditions. In addition to slow economic growth or recession, other economic circumstances, such as increases in energy prices, can also impact the automotive sector. The Group is also subject to risks inherent to operating globally, including those related to:

- exposure to local political conditions;
- import and/or export restrictions;
- multiple tax regimes, including regulations relating to transfer pricing and withholding and other taxes and duties;
- compliance with applicable anti-corruption laws;
- foreign investment and/or trade restrictions or requirements (including tariffs), foreign exchange controls and other trade barriers;
- the introduction of more stringent laws and regulations.

The Group is particularly susceptible to these risks in the emerging markets where it operates, including Turkey and Brazil. For instance, on June 23, 2016, a majority of voters in a national referendum in the United Kingdom (UK) voted to leave the European Union (EU). Although FCA does not believe Brexit, including a no-deal Brexit, would have a direct material impact on its operations, it could have an indirect impact. Additionally, in recent years, certain member countries of the European Union have implemented austerity measures which could impact the automotive sector. New or revised agreements between the U.S. and its trading partners may also impact our business, in particular with respect to trade tariffs. There has been a recent and significant increase in activity and speculation regarding tariffs and duties between the U.S. and other countries. In addition, FCA and other Brazilian taxpayers have recently had significant disputes with the Brazilian tax authorities. While FCA believes that it is more likely than not that there will be no significant impact from these disputes, given the complexity of the tax issues, there is a risk that the resolution of these disputes could have a material impact on the Group's financial performance. FCA - The Group may be unsuccessful in efforts to increase the growth of some of the brands that it believes have high potential. The volume growth and margin expansion strategies reflected in Group's business plan include the renewal of existing brands and the introduction of new brands. These strategies have required and will continue to require significant investments in products, powertrains, production facilities and other resources. FCA - Future performance depends on the Group's ability to offer innovative, attractive products.

The Group's success depends on, among other things, its ability to develop innovative, high-quality products that meet the needs of consumers. The Group may not be able to effectively compete with other automakers with regard to electrification, autonomous driving and other emerging technologies. In addition, as a result of the extended product development cycle and inherent difficulty in predicting consumer preferences, the Group may not be able to develop products that contain desirable technologies and are attractive to and accepted by consumers. The failure to develop and offer innovative, attractive and relevant products on a timely basis that compare favorably to those of competitors could have a material impact on the Group's financial performance. FCA - Laws, regulations and governmental policies, including those regarding increased fuel efficiency requirements, may impact the Group's business. As the Group seeks to comply with government regulations, particularly those related to fuel efficiency, vehicle emissions and other requirements, the Group expects the number and scope of these regulatory requirements, along with the costs associated with compliance, to increase. In addition, fuel efficiency regulations have increased in several markets. For example, in September 2017, China implemented new fuel efficiency requirements for light-duty vehicles. FCA - The Group is subject to diesel emissions investigations by several government agencies and to a number of lawsuits. On January 10, 2019, FCA announced that FCA US reached final settlements on civil, environmental and consumer protection claims related to diesel emissions. FCA remains subject to diesel emissions-related investigations by the U.S. Securities and Exchange Commission and other regulatory authorities. The Group has also received inquiries from other regulatory authorities in a number of jurisdictions as they examine the Group's compliance with applicable laws and regulations. In Europe, the group has been working with the Italian Ministry of Transport (MIT) and the Dutch Vehicle Regulator. In addition, at the request of the French Consumer Protection Agency, the Juge d'Instruction du Tribunal de Grande Instance de Paris is investigating the Group's compliance with applicable laws and regulations. While FCA believes that it has made meaningful progress in resolving a significant portion of the emissions related claims, there is a risk that the resolution of these claims could have a material impact on the Group's financial performance. Those inquiries and litigation may lead to further enforcement actions, penalties or damage awards, any of which could have a material impact on the Group's financial performance.

FCA - The Group's success largely depends on the ability of the management team to operate and manage the Group's business effectively. The Group's success largely depends on the ability of its senior executives and other members of management to execute the Group's strategy. The Group has developed succession plans that it believes are appropriate, although it is difficult to predict with certainty the future performance of the Group. FCA - The Group may be subject to more intensive competition if other manufacturers pursue consolidations. The Group has for some time advocated for consolidation in the automotive industry due to its view that the industry is overcapacity. FCA - Product recalls and warranty obligations may result in direct costs, and any resulting loss of vehicle sales could have a material impact on the Group's financial performance. FCA and the U.S. automotive industry in general, have experienced a sustained increase in recall activity to address product quality issues. Any costs incurred, or lost vehicle sales, resulting from product recalls could materially adversely affect the Group's financial performance. FCA - The automotive industry is highly competitive and cyclical and the Group may suffer from those factors mentioned above. Substantially all of the Group's revenues are generated in the automotive industry, which is highly competitive, cyclical and subject to changes in the general condition of the economy. In the automotive business, sales to consumers are cyclical and subject to changes in the general condition of the economy. The automotive industry is also subject to the constant renewal of product offerings through frequent launches of new models. Additionally, global vehicle production capacity exceeds current demand. In the event that industry shipments decline, the Group may experience a loss of sales. FCA - The lack of a captive finance company in certain key markets could place the Group at a competitive disadvantage. The Group's dealers enter into wholesale financing arrangements to purchase vehicles from the Group to hold inventory. Unlike many of its competitors, the Group does not own and operate a controlled finance company dedicated to financing the sale of vehicles.

In the event that FCA establishes a captive financial services company in the U.S., it will be subject to the risks  
In other markets, the Group relies on controlled finance companies, joint ventures and commercial relationships  
the performance of loans and leases in their portfolio, which could be materially affected by delinquent  
wholesale auction values of used vehicles;  
● higher than expected vehicle return rates and the residual value performance of vehicles they lease; a  
● fluctuations in interest rates and currency exchange rates.

Any financial services provider, including the Group's joint ventures and controlled finance companies, will also  
To the extent that a financial services provider is unable or unwilling to provide sufficient financing at competitive  
FCA - Vehicle retail sales depend heavily on affordable interest rates for vehicle financing

In certain regions, including NAFTA, financing for new vehicle sales has been available at relatively low interest  
FCA - The Group's business operations and reputation may be impacted by various types of claims, lawsuits, and  
The Group is currently subject to claims, lawsuits, investigations and other legal proceedings relating to

FCA - A significant security breach compromising the electronic control systems contained in the Group's vehicles  
The Group's vehicles, as well as vehicles manufactured by other original equipment manufacturers (or OEMs)  
FCA - A significant malfunction, disruption or security breach compromising the operation of the Group's information  
The Group's ability to keep its business operating effectively depends on the functional and efficient operation

A malfunction or security breach that results in a wide or sustained disruption to its business could have a material  
In addition to supporting its operations, the Group uses its systems to collect and store confidential and sensitive  
The Group's reputation could also suffer in the event of a data breach, which could cause consumers to purchase

FCA - There can be no assurance that the Group will be able to offset the earnings power lost from the expected  
On October 22, 2018, FCA announced that it has entered into a definitive agreement with CK Holdings, Ltd., a  
If the improvement in the Group's capital position resulting from the sale of Magneti Marelli is not sufficient to cover

FCA - The Group may not be able to adequately protect its intellectual property rights, which may harm its business  
The Group's success depends, in part, on its ability to protect its intellectual property rights. If the Group fails to  
The laws of some countries in which the Group operates do not offer the same protection of its intellectual property

FCA - The Group's reliance on joint arrangements in certain emerging markets may adversely affect the development  
The Group intends to expand its presence in emerging markets, including China and India, through partnerships  
For instance the GAC FCA JV locally produces the Jeep Cherokee, Jeep Renegade, Jeep Compass and all-new

The Group's reliance on joint arrangements to enter or expand its presence in these markets may expose it to  
FCA - The Group faces risks associated with increases in costs, disruptions of supply or shortages of raw materials  
The Group uses a variety of raw materials in its business including steel, aluminum, lead, resin and copper, and

As with raw materials, the Group is also at risk for supply disruption and shortages in parts and components for  
Any interruption in the supply or any increase in the cost of raw materials, parts, components and systems could  
FCA - Labor laws and collective bargaining agreements with the Group's labor unions could impact its ability to

Substantially all of the Group's production employees are represented by trade unions, are covered by collective  
These and other provisions in the Group's collective bargaining agreements may impede its ability to restructure  
FCA - The Group is subject to risks associated with exchange rate fluctuations, interest rate changes, credit risk

The Group operates in numerous markets worldwide and is exposed to market risks stemming from fluctuations  
The Group uses various forms of financing to cover funding requirements for its industrial activities and for providing  
In addition, although the Group manages risks associated with fluctuations in currency and interest rates through

The Group's financial services activities are also subject to the risk of insolvency of dealers and retail consumers  
FCA - FCA is a Dutch public company with limited liability, and the shareholders may have rights different from  
The rights of FCA's shareholders may be different from those of shareholders of a corporation governed by the laws of the U.S.

FCA - It may be difficult to enforce U.S. judgments against FCA  
FCA is incorporated under the laws of the Netherlands, and a substantial portion of its assets are outside of the  
FCA - FCA operates so as to be treated as exclusively resident in the United Kingdom for tax purposes, but the

FCA is not a company incorporated in the United Kingdom (?UK?). Therefore, whether it is resident in the UK for  
The test of "central management and control" is largely a question of fact and degree based on all the circumstances  
Although it has been accepted by HMRC that FCA's "central management and control" is in the UK, it would not

FCA's residence for Italian tax purposes is largely a question of fact based on all circumstances. The Company  
Although it has been accepted that its "central management and control" is in the UK, FCA would be resident in  
FCA does not expect a UK exit from the European Union resulting from the referendum held in June 2016 to affect  
FCA - If FCA is deemed to not maintain a permanent establishment in Italy, it could experience a material increase

Whether FCA has maintained a permanent establishment in Italy following the Merger (an "Italian P.E.") is largely  
FCA filed a ruling request with the Italian tax authorities in respect of the continuation of the Fiscal Unit via the  
Moreover, the Rulings are not assessments of certain sets of facts and circumstances. Therefore, even though the  
Risks related to FCA's liquidity and existing indebtedness

FCA - Limitations on the Group's liquidity and access to funding may limit its ability to execute its business strategy  
The Group's performance depends on, among other things, its ability to finance debt repayment obligations and  
The Group could, therefore, find itself in the position of having to seek additional financing and/or having to restructure  
FCA - The Group has significant outstanding indebtedness, which may limit its ability to obtain additional financing

Although it has substantially completed the de-leveraging of its balance sheet this year, the extent of the Group's  
it may not be able to secure additional funds for working capital, capital expenditures, debt service requirements  
● it may need to use a portion of its projected future cash flow from operations to pay principal and interest  
● it is more financially leveraged than its competitors, which may put it at a competitive disadvantage; and  
● it may not be able to adjust rapidly to changing market conditions, which may make it more vulnerable  
These risks may be exacerbated by volatility in the financial markets, particularly that resulting from perceived  
FCA - Restrictive covenants in the debt agreements could limit the Group's financial and operating flexibility



PartnerRe produces its business both through brokers and through direct relationships with insurance company  
PartnerRe - PartnerRe is exposed to credit risk relating to its reinsurance brokers and cedants  
In accordance with industry practice, PartnerRe may pay amounts owed under its reinsurance policies to broke  
PartnerRe - If PartnerRe is downgraded by rating agencies, its standing with brokers and customers could be n  
Third party rating agencies assess and rate the claims paying ability and financial strength of insurers and reins  
PartnerRe's financial strength ratings are subject to periodic review as rating agencies evaluate the Company  
If the Company's ratings were downgraded, its competitive position in the reinsurance industry may suffer, and  
PartnerRe's current financial strength ratings are as follows:

Standard & Poor's  
Moody's

The status of any further changes to ratings or outlooks will depend on various factors. PartnerRe can offer no  
PartnerRe - PartnerRe may require additional capital in the future, which may not be available or may only be a  
PartnerRe's future capital requirements depend on many factors, including regulatory requirements, its ability t  
PartnerRe - PartnerRe's investments are subject to interest rate, credit, equity and real estate related risks whi  
PartnerRe invests the net premiums it receives unless, or until such time as, it pays out losses and/or until they  
PartnerRe is exposed to significant financial and capital market risks, including changes in interest rates, credit  
PartnerRe's fixed maturity portfolio is primarily invested in high quality, investment grade securities. It also inve  
PartnerRe also invests in preferred and common stocks or equity-like securities. The value of these assets fluct  
Fluctuations in the fair value of its equity-like investments may reduce PartnerRe's income in any period or year  
In addition, PartnerRe invests directly and indirectly in real estate assets, which are subject to overall market co  
PartnerRe - foreign currency fluctuations may reduce PartnerRe's net income and its capital levels  
Through its multinational reinsurance operations, PartnerRe conducts business in a variety of foreign (non-U.S.)  
PartnerRe - PartnerRe may suffer losses due to defaults by others, including issuers of investment securities, r  
Issuers or borrowers whose securities PartnerRe holds, reinsurers, clearing agents, clearing houses, joint ventu  
PartnerRe - PartnerRe's debt, credit and International Swap Dealers Association (ISDA) agreements may limit  
PartnerRe has incurred indebtedness and may incur additional indebtedness in the future. Additionally, it has e  
The agreements relating to its debt, letter of credit facilities and ISDA agreements contain various covenants th  
If PartnerRe is in default under the terms of these agreements, then it would also be restricted in its ability to de  
PartnerRe - If any one of the financial institutions that PartnerRe uses in its operations, including those that par  
PartnerRe maintains cash balances significantly in excess of the U.S. Federal Deposit Insurance Corporation in  
Those banks may not be able to meet their funding requirements if they experience shortages of capital and liqu  
PartnerRe - Operational risks, including human or systems failures, are inherent in PartnerRe's business  
Operational risks and losses can result from many sources including fraud, errors by employees, failure to docu  
PartnerRe's modeling, underwriting and information technology and application systems are critical to its busin  
PartnerRe - Cybersecurity events could disrupt business operations, result in the loss of critical and confidential  
PartnerRe is dependent upon the effective functioning and availability of its information technology and applicat  
PartnerRe - The loss of key management personnel could adversely affect PartnerRe  
PartnerRe's success has depended, and will continue to depend, partly upon its ability to attract and retain ma  
PartnerRe believes there are only a limited number of available qualified executives in the business lines in whi  
PartnerRe ? The business may be adversely impacted by inflation

Deficit spending by governments in PartnerRe's major markets exposes PartnerRe to heightened risk of inflatio

#### Risks Related to PartnerRe's Industry

PartnerRe - PartnerRe's profitability is affected by the cyclical nature of the reinsurance industry  
Historically, the reinsurance industry has experienced significant fluctuations in operating results due to compet  
Although the Company is currently experiencing improving market conditions with increased pricing in most No  
PartnerRe - PartnerRe operates in a highly competitive environment  
The reinsurance industry is highly competitive and PartnerRe competes with a number of worldwide reinsuranc  
The lack of strong barriers to entry into the reinsurance business means that PartnerRe also competes with nev  
Competition in the types of reinsurance that PartnerRe underwrites is based on many factors, including the per  
Further, insurance-linked securities and derivative and other non-traditional risk transfer mechanisms and altern  
The level of competition is determined by supply of and demand for capacity. Demand is determined by client b  
All of the above factors may adversely affect PartnerRe's profitability and results of operations in future periods

#### Legal and Regulatory Risks

PartnerRe - Political, regulatory, governmental and industry initiatives could adversely affect PartnerRe's busin  
PartnerRe's reinsurance operations are subject to extensive laws and regulations that are administered and en  
It is not possible to predict all future impacts of these types of changes but they could affect the way PartnerRe  
In addition, in order to ensure compliance with applicable regulatory requirements or as a result of any investig  
Recent government intervention and the possibility of future government intervention have created uncertainty  
PartnerRe believes it is likely there will continue to be increased regulation of, and other forms of government p

- Providing reinsurance capacity in markets and to clients that PartnerRe targets or requiring PartnerRe
- Further restricting PartnerRe's operational or capital flexibility;
- Expanding the scope of coverage under existing policies;
- Regulating the terms of reinsurance policies;
- Adopting further or changing compliance requirements which may result in additional costs which may
- Disproportionately benefiting the companies domiciled in one country over those domiciled in another.

The insurance industry is also affected by political, judicial and legal developments that may create new and ex  
PartnerRe - Legal and enforcement activities relating to the insurance industry could affect PartnerRe's busin  
The insurance industry has experienced substantial volatility as a result of litigation, investigations and regulato  
These investigations have resulted in changes in the insurance and reinsurance markets and industry business

PartnerRe - Emerging claim and coverage issues could adversely affect PartnerRe's business  
Unanticipated developments in the law, as well as changes in social and environmental conditions could potentially affect PartnerRe's business  
The full effects of these and other unforeseen emerging claim and coverage issues are extremely hard to predict  
The insurance industry is also affected by political, judicial and legal developments that may create new and existing risks  
PartnerRe - The vote by the U.K. to leave the EU could adversely affect PartnerRe's business  
As a result of Brexit, negotiations to determine the terms of the U.K.'s withdrawal from the EU and its future relationship with the EU  
Brexit could also lead to legal uncertainty and differing laws and regulations between the U.K., and the EU, and the U.K. and the EU  
PartnerRe - PartnerRe's international business is subject to applicable laws and regulations relating to sanctions and anti-bribery laws  
PartnerRe must comply with all applicable economic sanctions and anti-bribery laws and regulations of the U.S. and other countries  
PartnerRe - PartnerRe's international business is subject to applicable laws and regulations relating to data protection  
Regulatory authorities around the world have implemented or are considering a number of legislative changes  
The General Data Protection Regulation, which regulates data protection for all individuals within the EU, includes requirements for data controllers and processors  
As a group operating worldwide, PartnerRe strives to comply with all applicable data protection laws and regulations

PartnerRe - PartnerRe is subject to cybersecurity risks and may incur increasing costs in an effort to manage them  
The cybersecurity regulatory environment is evolving, and the related costs and resources required for compliance are increasing  
Among the requirements are the maintenance of a cybersecurity program with governance controls, risk-based assessments, and incident response plans  
Taxation Risks  
PartnerRe - Changes in PartnerRe's effective income tax rate could affect its results of operations  
PartnerRe's effective income tax rate could be adversely affected in the future by net income being lower than expected  
In addition, the determination of PartnerRe's provisions for income taxes requires significant judgment, and the amount of provisions may vary significantly

PartnerRe - The U.S. Tax Cuts and Jobs Act could materially and negatively impact PartnerRe's business, financial results and cash flows  
The U.S. Tax Cuts and Jobs Act (the "TCJA") was signed into law on December 22, 2017. In addition to reducing the corporate income tax rate from 35% to 21%, the TCJA also includes provisions that may affect PartnerRe's business  
PartnerRe - If PartnerRe's non-U.S. operations become subject to U.S. income taxation, its net income will decrease  
PartnerRe believes that the Company itself and its non-U.S. subsidiaries, other than certain business sourced back to the U.S., are not currently subject to U.S. income taxation  
In addition, legislation regarding the scope of non-U.S. entities and operations subject to U.S. income tax has been introduced in the U.S. Congress

CNH INDUSTRIAL  
Risks related to the business, strategy and operations  
CNH Industrial - Global economic conditions impact the business  
The Group's results of operations and financial position are and will continue to be influenced by macroeconomic conditions  
Economic conditions vary across regions and countries, and demand for the Group's products and services generally varies with economic activity  
CNH Industrial - The Group is exposed to political, economic and other risks beyond its control as a result of operating in a global market  
The Group manufactures and sells products and offers services in several continents and numerous countries and is subject to risks such as:  
• changes in laws, regulations and policies that affect, among other things:  
• import and export duties and quotas;  
• currency restrictions;  
• the design, manufacture and sale of the Group's products, including, for example, engine emissions regulations;  
• interest rates and the availability of credit to the Group's dealers and customers;  
• property, contract rights and intellectual property;  
• where, to whom and what types of products may be sold, including new or additional trade or economic barriers;  
• taxes;  
• regulations from changing world organization initiatives and agreements;  
• changes in the dynamics of the industries and markets in which the Group operates;  
• labor disruptions;  
• disruption in the supply of raw materials and components, including rare materials (the latter might be subject to export controls);  
• changes in governmental debt relief and subsidy program policies in certain significant markets such as China;  
• withdrawal from or changes to trade agreements or trade terms, negotiation of new trade agreements;  
• war, civil unrest and terrorism.

In recent years, terrorist attacks have occurred around the world, leading to personal safety anxieties and political instability  
There can be no guarantee that the Group will be able to quickly and completely adapt its business model to changes in the global market  
CNH Industrial - Reduced demand for equipment would reduce the Group's sales and profitability  
The agricultural equipment market is influenced, in particular, by factors such as:  
• the price of agricultural commodities and the ability to competitively export agricultural commodities;  
• the profitability of agricultural enterprises, farmers' income and their capitalization;  
• the demand for food products; and  
• agricultural policies, including aid and subsidies to agricultural enterprises provided by governments around the world

In addition, unfavorable climatic conditions, especially during the spring, a particularly important period for general construction  
The construction equipment market is influenced, in particular, by factors such as:  
• public infrastructure spending; and  
• new residential and non-residential construction; and  
• capital spending in oil and gas and, to a lesser extent, in mining.

The commercial vehicles market is influenced, in particular, by factors such as:  
• changes in global market conditions, including the level of interest rates;  
• changes in levels of business investment, including timing of fleet renewals; and  
• public infrastructure spending.

The above factors can significantly influence the demand for agricultural and construction equipment, as well as the Group's financial results  
CNH Industrial - The Group depends on suppliers for raw materials, parts and components  
The Group relies upon suppliers for raw materials, parts and components that it requires to manufacture its products  
The Group uses a variety of raw materials in its businesses, including steel, aluminum, lead, resin and copper, and is exposed to price fluctuations  
CNH Industrial - Competitive activity, or failure by the Group to respond to actions by its competitors, could adversely affect the Group's business  
The Group operates in highly competitive global and regional markets. Depending on the particular country, it may face different competitive conditions  
CNH Industrial - Costs of ongoing compliance with, or failure to comply with, increasingly stringent environmental and safety regulations could increase the Group's costs  
The Group is subject to comprehensive and constantly evolving laws, regulations and policies in numerous jurisdictions  
Further, environmental, health and safety regulations change from time to time, as may related interpretations and enforcement  
CNH Industries - Changes in government monetary or fiscal policies may negatively impact the group's results

Most countries where the Group's products and services are sold have established central banks to regulate m  
CNH Industrial ? The Group's future performance depends on its ability to innovate and on market acceptance  
The success of the Group's businesses depends on their ability to maintain or increase their market share in e  
CNH Industrial ? The Group's existing operations and expansion plans in emerging markets could entail signific  
The Group's ability to grow its businesses depends to an increasing degree on its ability to increase market sh  
CNH Industrial ? The Group is subject to extensive anti-corruption and antitrust laws and regulations  
Due to the global scope of the Group's operations, it is subject to many laws and regulations that apply to its o  
CNH Industrial ? The Group may be adversely affected by the UK vote to leave the European Union (Brexit)  
In a June 23, 2016 referendum, the United Kingdom (?U.K.?) voted to terminate the U.K.'s membership in the  
Brexit could adversely affect U.K., European or worldwide economic and market conditions more broadly and c  
CNH Industrial is organized as a Dutch company but it is considered resident in the U.K. for U.K. tax purposes.  
CNH Industrial - Dealer equipment sourcing and inventory management decisions could adversely affect the G  
The Group sells its products primarily through independent dealers and is subject to risks relating to their inven  
CNH Industrial - The Group may not be able to realize anticipated benefits from any acquisitions and, further, c  
The Group has engaged in the past, and may engage in the future, in mergers and acquisitions or enter into, ex

- technological and product synergies, economies of scale and cost reductions not occurring as expected
- unexpected liabilities;
- incompatibility of operating information or other systems;
- unexpected changes in laws;
- inability to retain key employees;
- protecting intellectual property rights;
- inability to source certain products or components (or the cost thereof);
- significant costs associated with terminating or modifying alliances; and
- problems in retaining customers and integrating operations, services, personnel, and customer bases.

If problems or issues were to arise among the parties to one or more strategic alliances for managerial, financial  
CNH Industrial ? The Group's business operations may be adversely impacted by various types of claims, laws  
The Group is involved in pending litigation and investigations on a wide range of topics, including dealer and su  
CNH Industrial ? A cybersecurity breach could interfere with the Group's operations, compromise confidential i  
The Group relies upon information technology systems and networks in connection with a variety of its busines  
While the Group actively manages information technology security risks within its control through security meas  
A failure or breach in security, whether of the Group's systems and networks or those of third parties on which  
CNH Industrial - Changes in privacy laws could disrupt the Group's business

The Group is also subject to various laws regarding privacy and the protection of personal information. The reg  
CNH Industrial ? The Group faces risks associated with its employment relationships  
In many countries where the Group operates, its employees are protected by laws and/or collective labor agree  
CNH Industrial - The ability to execute its strategy is dependent upon the Group's ability to attract, motivate an  
The Group's ability to compete effectively, to manage its business effectively and to expand its business deper

CNH Industrial ? The Group's business may be affected by unfavorable weather conditions, climate change or  
Poor, severe or unusual weather conditions caused by climate change or other factors, particularly during the p  
In addition, natural disasters, pandemic illness, terrorist attacks or violence, equipment failures, power outages,  
Furthermore, the potential physical impacts of climate change on the Group's facilities, suppliers and customer  
CNH Industrial - Changes in demand for food and alternate energy sources could impact the Group's revenues  
Changing worldwide demand for farm outputs to meet the world's growing food and alternative energy demand  
CNH Industrial - International trade policies may impact demand for the Group's products and its competitive p  
Government policies on international trade and investment such as sanctions, import quotas, capital controls or

#### Financial risks

CNH Industrial ? difficulty in obtaining financing or refinancing existing debt could impact the Group's financial  
The Group's future performance will depend on, among other things, its ability to finance debt repayment oblig  
The Group's ability to access the capital markets or other forms of financing and related costs are highly deper  
CNH Industrial ? The Group is subject to exchange rate fluctuations, interest rate changes and other market ris  
The Group operates in numerous markets worldwide and is exposed to market risks stemming from fluctuations  
The Group uses various forms of financing to cover the funding requirements of its Industrial Activities and for f  
Although the Group seeks to manage its currency risk and interest rate risk, including through hedging activities  
The Group also faces risks from currency devaluations. Currency devaluations result in a diminished value of fu

CNH Industrial ? Because Financial Services provides financing for a significant portion of the Group's sales w  
Negative economic conditions can have an adverse effect on the financial industry in which Financial Services  
CNH Industrial ? An increase in delinquencies or repossessions could adversely affect the results of Financial S  
Fundamental in the operation of Financial Services is the credit risk associated with its customers/borrowers. T  
In addition, although Financial Services evaluates and adjusts its allowance for credit losses related to past due

CNH Industrial ? New regulations or changes in financial services regulations could adversely impact the Group  
Financial Services? operations are highly regulated by governmental authorities in the locations where it operat  
CNH Industrial ? The Group may be exposed to shortfalls in its pension plans  
At December 31, 2018, the funded status for the Group's defined benefit pension and other post-employment l  
To the extent that the Group's obligations under a plan are unfunded or underfunded, it will have to use cash fl  
CNH Industrial ? The Group has significant outstanding indebtedness, which may limit its ability to obtain additi

As of December 31, 2018, the Group had an aggregate of \$24,543 million (including \$19,358 million relating to  
the Group may not be able to secure additional funds for working capital, capital expenditures, debt se  
the Group may need to use a portion of its projected future cash flow from operations to pay principal  
the Group may be more financially leveraged than some of its competitors, which could put it at a com  
the Group may not be able to invest in the development or introduction of new products or new busine  
the Group may not be able to adjust rapidly to changing market conditions, which may make it more vul  
the Group may not be able to access the capital markets on favorable terms, which may adversely affe

- the Group may not be able to secure additional funds for working capital, capital expenditures, debt se
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These risks are exacerbated by the ongoing volatility in the financial markets, in part resulting from perceived stress in the financial markets. CNH Industrial's Restrictive covenants in the Group's debt agreements could limit its financial and operating flexibility. The agreements governing the Group's outstanding debt securities and other credit agreements to which it is a party may require the Group to incur additional indebtedness by certain subsidiaries; make certain investments; enter into certain types of transactions with affiliates; sell or acquire certain assets or merge with or into other companies; and/or use assets as security in other transactions.

Although the Group does not believe any of these covenants materially restrict its operations currently, a breach of any of these covenants could have a material adverse effect on the Group's financial condition and results of operations. Other risks

CNH Industrial ? The Group operates and will continue to operate, as a company that is resident in the U.K. for tax purposes. CNH Industrial is not incorporated in the U.K.; therefore, in order to be resident in the U.K. for tax purposes, CNH Industrial's central management and control is in the U.K., CNH Industrial is considered to be resident in the U.K. for tax purposes. CNH Industrial does not expect Brexit to affect its tax residency in the U.K.; however, it is unable to predict with certainty the effect of Brexit on CNH Industrial's residence for Italian tax purposes is also largely a question of fact based on all the circumstances.

CNH Industrial ? Tax may be required to be withheld from dividend payments. Although the U.K. and Dutch competent authorities have ruled that CNH Industrial should be treated as solely resident in the U.K. for tax purposes, should withholding taxes be imposed on future dividends or distributions with respect to CNH Industrial common shares, this could have a material adverse effect on the Group's financial condition and results of operations.

CNH Industrial ? The Group may incur additional tax expense or become subject to tax exposure. The Group is subject to income taxes in many jurisdictions around the world. Its tax liabilities are dependent upon the results of tax audits in various jurisdictions. CNH Industrial ? The maintenance of two exchange listings may adversely affect liquidity in the market for CNH Industrial common shares.

The dual listing of CNH Industrial's common shares on the NYSE and the MTA may split trading between the two exchanges, which could result in lower trading volumes and volatility. CNH Industrial ? The loyalty voting structure may affect the liquidity of the Company's common shares and restrict the ability of investors to exercise their rights as shareholders. This loyalty voting structure is designed to ensure that the Company's shareholding base remains long-term oriented. CNH Industrial ? The loyalty voting structure may prevent or frustrate attempts by the Company's shareholders to effect a change of control of the Company. The provisions of the Company's Articles of Association establishing the loyalty voting structure may make it more difficult for shareholders to effect a change of control of the Company. The loyalty voting structure may also prevent or discourage shareholders' initiatives aimed at changes in the Company's management or board of directors.

### FERRARI

#### Risks Related to the business, strategy and operations

Ferrari - Ferrari may not succeed in preserving and enhancing the value of the Ferrari brand, which it depends upon. Ferrari's financial performance is influenced by the perception and recognition of the Ferrari brand, which, in turn, is influenced by the success of its Formula 1 racing team. Ferrari selectively licenses the Ferrari brand to third parties that produce and sell Ferrari-branded luxury goods. Ferrari ? Ferrari's brand image depends in part on the success of its Formula 1 racing team. The prestige, identity, and appeal of the Ferrari brand depend in part on the continued success of the Scuderia Ferrari Formula 1 racing team. The success of its racing team depends in particular on Ferrari's ability to attract and retain top drivers and race engineers.

Ferrari ? If Ferrari is unable to keep up with advances in high performance car technology, its brand and competitive position may be adversely affected. Performance cars are characterized by leading-edge technology which is constantly evolving. In particular, advanced technologies such as hybrid and electric powertrains are being developed and applied to high performance cars. As technologies change, Ferrari plans to upgrade or adapt its cars and introduce new models in order to continue to offer high performance cars. The transition to hybrid and electric technologies is costly and may become even more costly in the future. Developing and applying new automotive technologies is costly and may become even more costly in the future.

Ferrari - If its car designs do not appeal to clients, Ferrari's brand and competitive position may suffer. Design and styling are an integral component of Ferrari's models and of its brand. Its cars have historically been designed and styled to appeal to a niche market of affluent collectors and enthusiasts. Ferrari - The value of the Ferrari brand depends in part on the automobile collector and enthusiast community. An important factor in the connection of clients to the Ferrari brand is Ferrari's strong relationship with the global collector and enthusiast community. If there is a change in collector appetite or damage to its brand, Ferrari's ties to and the support it receives from the collector and enthusiast community may be adversely affected.

Ferrari ? Ferrari's business is subject to changes in client preferences and trends in the automotive and luxury goods markets. Ferrari's continued success depends in part on its ability to originate and define product and trends in the automotive and luxury goods markets. The automotive and luxury goods markets are highly competitive and rapidly changing. Furthermore, this risk is particularly pronounced as Ferrari expands in accordance with its strategy into adjacent product categories. Ferrari - Demand for luxury goods, including luxury performance cars, is volatile, which may adversely affect Ferrari's business. Volatility of demand for luxury goods, in particular luxury performance cars, may adversely affect Ferrari's business.

Ferrari - Ferrari faces competition in the luxury performance car industry. Ferrari faces competition in all product categories and markets in which it operates. It competes with other international luxury performance car manufacturers. Ferrari ? Ferrari's growth strategy exposes it to risks. Ferrari's growth strategy includes a controlled expansion of its sales and operations, including the launching of new models and the expansion of its retail network. Ferrari's growth depends on the continued success of its existing cars, as well as the successful design and introduction of new models. Ferrari's growth strategy may expose it to new business risks that it may not have the expertise, capability or resources to manage. Ferrari plans to redesign its international network footprint and skill set. It also plans to open additional retail stores in new markets.

Consumer demand and behavior, as well as tastes and purchasing trends may differ in these markets, and as a result, Ferrari's international expansion plans may be unsuccessful, its business, results of operation and financial performance may be adversely affected. Ferrari - The low volume strategy may limit potential profits, and if volumes increase Ferrari's brand exclusivity may be diluted. A key to the appeal of the Ferrari brand and its marketing strategy is the aura of exclusivity and the sense of luxury. On the other hand, Ferrari's current growth strategy contemplates a measured but significant increase in car sales. In pursuit of its strategy, Ferrari may be unable to maintain the exclusivity of the brand. If it is unable to balance the need for exclusivity with the need for growth, Ferrari's brand and competitive position may be adversely affected.

Ferrari - The small number of car models Ferrari produces and sells may result in greater volatility in its financial performance. Ferrari depends on the sales of a small number of car models to generate its revenues. Ferrari's current production strategy may result in greater volatility in its financial performance. Ferrari - Global economic conditions may adversely affect Ferrari's business. Ferrari's sales volumes and revenues may be affected by overall general economic conditions. Deteriorating global economic conditions may result in lower consumer spending in the luxury performance car industry. Many factors affect the level of consumer spending in the luxury performance car industry, including the state of the global economy, interest rates, and the availability of credit.

Many factors affect the level of consumer spending in the luxury performance car industry, including the state of the global economy, interest rates, and the availability of credit. Ferrari's sales volumes and revenues may be affected by overall general economic conditions. Deteriorating global economic conditions may result in lower consumer spending in the luxury performance car industry. Many factors affect the level of consumer spending in the luxury performance car industry, including the state of the global economy, interest rates, and the availability of credit.

Ferrari - Developments in China and other growth and emerging markets may adversely affect Ferrari's business  
 Ferrari operates in a number of growth and emerging markets, both directly and through its dealers and it has  
 Ferrari believes it has potential for further success in new geographies, in particular in China, but also more generally  
 Ferrari's exposure to growth and emerging countries is likely to increase, as it pursues expanded sales in such  
 Maintaining and strengthening its position in these growth and emerging markets is a key component of Ferrari's  
 global business strategy.

Ferrari - Ferrari may be adversely affected by the UK determination to leave the European Union (Brexit)  
 By 23 June 2016, the United Kingdom formally notified the European Union of its intention to withdraw from the European  
 Union. Ferrari's success depends largely on the ability of its current management team to operate and manage  
 Ferrari's success depends on the ability of its senior executives and other members of management to effectively  
 Ferrari - Ferrari relies on its dealer network to provide sales and services  
 Ferrari does not own its dealers and virtually all of its sales are made through its network of dealerships located  
 Ferrari's growth strategy also depends on its ability to attract a sufficient number of quality new dealers to sell  
 Ferrari's business depends on a significant number of suppliers, which provide the raw materials, components  
 Ferrari cannot guarantee that it will be able to maintain access to these raw materials, and in some cases this access  
 As with raw materials, Ferrari is also at risk of supply disruption and shortages in parts and components it purchases  
 In the past, Ferrari has replaced certain suppliers because they failed to provide components that met its quality  
 Changes in Ferrari's supply chain have in the past resulted and may in the future result in increased costs and  
 More, if Ferrari's suppliers fail to provide components in a timely manner or at the level of quality necessary to  
 Ferrari's business, Ferrari's business depends on its manufacturing facilities in Maranello and Modena  
 Ferrari assembles all of the cars that it sells and manufactures, and all of the engines it uses in its cars and sells  
 In the event that it were unable to continue production at either of these facilities or it became uneconomic for it  
 Maranello and Modena are located in the Emilia-Romagna region of Italy which has the potential for seismic activity  
 Ferrari - Ferrari relies on its licensing and franchising partners to preserve the value of its licenses and the failure  
 Ferrari currently has multi-year agreements with licensing partners for various Ferrari-branded products in the sports  
 Ferrari - Ferrari depends on the strength of its trademarks and other intellectual property rights  
 Ferrari believes that its trademarks and other intellectual property rights are fundamental to its success and man  
 Ferrari - Third parties may claim that Ferrari infringes their intellectual property rights  
 Ferrari believes that it holds all the rights required for its business operations (including intellectual property rights)  
 Ferrari - Revenues from Formula 1 activities may decline and related expenses may grow  
 Revenues from Ferrari's Formula 1 activities depend principally on the income from its sponsorship agreements  
 If Ferrari is unable to renew its existing sponsorship agreements or if it enters into new or renewed sponsorship  
 In addition, extensive talks were held in 2018 and are continuing among the owners of the Formula 1 business  
 Ferrari - Engine production revenues are dependent on Maserati's ability to sell its cars  
 Ferrari produces V8 and V6 engines for Maserati. It has a multi-year arrangement with Maserati to provide V6 engines  
 Ferrari - Ferrari faces risks associated with its international operations, including unfavorable regulatory, political  
 Ferrari currently has international operations and subsidiaries in various countries and jurisdictions in Europe, M

- conforming its cars to various international regulatory and safety requirements where its cars are sold;
- difficulty in establishing, staffing and managing foreign operations;
- difficulties attracting clients in new jurisdictions;
- foreign government taxes, regulations and permit requirements, including foreign taxes that it may not
- fluctuations in foreign currency exchange rates and interest rates, including risks related to any interest
- its ability to enforce its contractual and intellectual property rights, especially in those foreign countries
- European Union and foreign government trade restrictions, customs regulations, tariffs and price or ex
- foreign labor laws, regulations and restrictions;
- preferences of foreign nations for domestically produced cars;
- changes in diplomatic and trade relationships;
- political instability, natural disasters, war or events of terrorism; and
- the strength of international economies.

If Ferrari fails to successfully address these risks, many of which it cannot control, its business, operating results  
 Ferrari - New laws, regulations, or policies of governmental organizations regarding increased fuel economy re  
 Ferrari is subject throughout the world to comprehensive and constantly evolving laws, regulations and policies  
 Current European legislation limits fleet average greenhouse gas emissions for new passenger cars. Due to its  
 In the United States, the U.S. Environmental Protection Agency (EPA) and the National Highway Traffic Safe  
 In the United States, considerable uncertainty is associated with emissions regulations under the current admin  
 In the state of California (which has been granted special authority under the Clean Air Act to set its own vehicl  
 In addition, Ferrari is subject to legislation relating to the emission of other air pollutants such as, among others  
 Other governments around the world, such as those in Canada, South Korea, China and certain Middle Eastern  
 In response to severe air quality issues in Beijing and other major Chinese cities, in 2016 the Chinese governm  
 Ferrari could lose its status as an SVM in the EU, the United States and other countries if it does not continue t  
 Under these existing regulations, as well as new or stricter rules or policies, Ferrari could be subject to sizabl  
 In the future, the advent of self-driving technology may result in regulatory changes that Ferrari cannot predict  
 In September 2017 the Chinese government issued the Administrative Measures on CAFC (Corporate Average  
 Ferrari - The introduction of hybrid cars is costly and its long-term success is uncertain  
 Ferrari is gradually but rapidly introducing hybrid technology in its cars. In accordance with its strategy, Ferrari  
 While some of Ferrari's past models, such as LaFerrari and LaFerrari Aperta, have included hybrid technology  
 In Ferrari's transition to self-driving technology, it may face competition from other manufacturers, which may  
 Because hybrid technology is a core component of Ferrari's strategy, and it expects that a significant portion o  
 Ferrari - If its cars do not perform as expected Ferrari's ability to develop, market and sell its cars could be har



Ferrari's cars may contain defects in design and manufacture that may cause them not to perform as expected  
Ferrari - Car recalls may be costly and may harm Ferrari's reputation  
Ferrari has in the past and may from time to time in the future be required to recall its products to address performance issues  
Ferrari - Ferrari may become subject to product liability claims, which could harm its financial condition and liquidity  
Ferrari may become subject to product liability claims, which could harm its business, operating results and financial condition  
Ferrari - Ferrari is exposed to risks in connection with product warranties as well as the provision of services  
A number of Ferrari's contractual and legal requirements oblige it to provide extensive warranties to its clients, and there is also a risk that Ferrari will be required to extend the guarantee or warranty originally granted in certain circumstances  
Ferrari's insurance coverage may not be adequate to protect Ferrari against all potential losses to which it may be exposed  
Ferrari maintains insurance coverage that it believes is adequate to cover normal risks associated with the operation of its business  
Ferrari - improper conduct of employees, agents, or other representatives could adversely affect Ferrari's reputation  
Ferrari's compliance controls, policies and procedures may not in every instance protect it from acts committed by its employees, agents, or other representatives  
Ferrari - A disruption in information technology could compromise confidential and sensitive information  
Ferrari depends on its information technology and data processing systems to operate its business, and a significant disruption of these systems could adversely affect its operations  
Any unauthorized access to in-vehicle IT systems may compromise the car security or the privacy of customers  
Ferrari's indebtedness could adversely affect its operations and it may face difficulties in servicing or refinancing its debt  
As of December 31, 2018, Ferrari's gross consolidated debt was approximately €1,927 million (which includes debt of its subsidiaries)  
Ferrari - Car sales depend in part on the availability of affordable financing  
In certain regions, financing for new car sales has been available at relatively low interest rates for several years, but this may change  
Ferrari - Ferrari may not be able to provide adequate access to financing for its dealers and clients, and its financial condition could be adversely affected  
Ferrari's dealers enter into wholesale financing arrangements to purchase cars from it to hold in inventory or to sell to customers  
In most markets, Ferrari relies on controlled finance companies and commercial relationships with third parties, and the performance of loans and leases in their portfolio, which could be materially affected by delinquency rates higher than expected car return rates and the residual value performance of cars they lease; and fluctuations in interest rates and currency exchange rates.

Furthermore, to help fund its retail and wholesale financing business, Ferrari's financial services companies also provide other financial services  
Any financial services provider, including Ferrari's controlled finance companies, will face other demands on its capital and liquidity  
To the extent that a financial services provider is unable or unwilling to provide sufficient financing at competitive rates, Ferrari's dealer and retail customer financing in Europe are mainly provided through its partnership with FCA EAS  
Ferrari - Labor laws and collective bargaining agreements with its labor unions could impact Ferrari's ability to attract and retain employees  
All of Ferrari's production employees are represented by trade unions, are covered by collective bargaining agreements, and may be subject to strikes or other labor actions  
Ferrari - Ferrari is subject to risks associated with exchange rate fluctuations, interest rate changes, credit risk, and other market risks  
Ferrari operates in numerous markets worldwide and is exposed to market risks stemming from fluctuations in currency exchange rates  
Ferrari seeks to manage risks associated with fluctuations in currency through financial hedging instruments. A significant change in currency exchange rates could adversely affect Ferrari's financial condition  
Ferrari's financial services activities are also subject to the risk of insolvency of dealers and retail clients, as well as changes in credit ratings  
Ferrari - changes in tax, tariff or fiscal policies could adversely affect demand for Ferrari's products  
Imposition of any additional taxes and levies designed to limit the use of automobiles could adversely affect the demand for Ferrari's cars  
The impact of any such tariffs on Ferrari's operations and results is uncertain and could be significant, and it could be difficult to quantify  
Ferrari - If Ferrari were to lose its Authorized Economic Operator certificate, it may be required to modify its current operations  
Because Ferrari ships and sells its cars in numerous countries, the customs regulations of various jurisdictions could adversely affect its operations

**Risks Related to the Common Shares**  
Ferrari - the market price and trading volume of Ferrari's common shares may be volatile, which could result in fluctuations in Ferrari's revenue and earnings  
The market price of Ferrari's common shares may be highly volatile and could be subject to wide fluctuations. Such volatility may be caused by:  
• variations in Ferrari's operating results, or failure to meet the market's earnings expectations;  
• publication of research reports about it, the automotive industry or the luxury industry, or the failure of other companies in the industry;  
• departures of any members of Ferrari's management team or additions or departures of other key personnel;  
• adverse market reaction to any indebtedness Ferrari may incur or securities it may issue in the future; actions by shareholders;  
• changes in market valuations of similar companies;  
• changes or proposed changes in laws or regulations, or differing interpretations thereof, affecting Ferrari;  
• adverse publicity about the automotive industry or the luxury industry generally, or particularly scandalous events;  
• litigation and governmental investigations; and  
• general market and economic conditions.

Ferrari - The loyalty voting program may affect the liquidity of Ferrari's common shares and reduce the common shares' trading volume  
The implementation of Ferrari's loyalty voting program could reduce the trading liquidity and adversely affect the market price of Ferrari's common shares  
The loyalty voting program is designed to encourage shareholders to vote on matters relating to the company's operations  
Ferrari - The interests of Ferrari's largest shareholders may differ from the interests of other shareholders  
EXOR N.V. (EXOR?) is Ferrari's largest shareholder, holding approximately 23.7 percent of its outstanding common shares  
In addition, as of February 15, 2019, Piero Ferrari, the Vice Chairman of Ferrari, holds approximately 10.1 percent of Ferrari's common shares  
Ferrari - Ferrari may have potential conflicts of interest with FCA and EXOR's related companies  
Questions relating to conflicts of interest may arise between Ferrari and FCA, the former largest shareholder in Ferrari  
Ferrari - The loyalty voting program may make it more difficult for shareholders to acquire a controlling interest in Ferrari  
The provisions of Ferrari's articles of association which establish the loyalty voting program may make it more difficult for shareholders to acquire a controlling interest in Ferrari  
Ferrari is a Dutch public company with limited liability, and its shareholders may have rights different from those of shareholders of a company governed by the laws of the United States  
Ferrari - Ferrari expects to maintain its status as a "foreign private issuer" under the rules and regulations of the SEC  
As a "foreign private issuer," Ferrari is exempt from rules under the Securities Exchange Act of 1934, as amended, that would otherwise apply to it  
Ferrari's ability to pay dividends on its common shares may be limited and the level of future dividends may fluctuate significantly  
Ferrari's payment of dividends on its common shares in the future will be subject to business conditions, financial performance, and other factors  
Ferrari - The maintenance of two exchange listings may adversely affect liquidity in the market for Ferrari's common shares  
Ferrari's common shares are listed on the NYSE and the MTA, and the split trading between the NYSE and the MTA, adversely affects the liquidity of Ferrari's common shares

Ferrari - It may be difficult to enforce U.S. judgments against the Company  
Ferrari is organized under the laws of the Netherlands, and a substantial portion of its assets are outside of the United States  
In addition, there is uncertainty as to whether the courts outside the United States would recognize or enforce judgments against Ferrari  
Ferrari - FCA creditors may seek to hold Ferrari liable for certain FCA obligations  
One step of Ferrari's Separation from FCA included a demerger from FCA of the Ferrari common shares previously held by FCA  
Risks Related to Taxation  
Ferrari - Changes to taxation or the interpretation or application of tax laws could have an adverse impact on its business  
Ferrari's business is subject to various taxes in different jurisdictions (mainly Italy), which include, among other things, income taxes, corporate taxes, and sales taxes  
Changes in tax laws or regulations or in the position of the relevant Italian and non-Italian authorities regarding taxation could have an adverse impact on Ferrari's business  
In order to reduce future potential disputes with tax authorities, Ferrari seeks advance agreements with tax authorities in various jurisdictions  
In addition, tax laws are complex and subject to subjective valuations and interpretive decisions, and Ferrari will continue to be subject to audits and potential disputes with tax authorities  
Ferrari - As a result of the demergers and the merger in connection with the Separation, Ferrari might be jointly and severally liable for the tax obligations of the companies that were merged into Ferrari  
Although the Italian tax authorities confirmed in a positive advance tax ruling issued on October 9, 2015 that the tax liability of the companies merged into Ferrari will be limited to the tax liability of those companies, there is no assurance that the Italian tax authorities will continue to issue such advance tax rulings  
Ferrari - There may be potential "Passive Foreign Investment Company" tax considerations for U.S. holders of Ferrari stock  
Shares of Ferrari stock would be stock of a "passive foreign investment company," or a PFIC, for U.S. federal income tax purposes if Ferrari is a PFIC  
U.S. persons who own shares of a PFIC are subject to a disadvantageous U.S. federal income tax regime with respect to such shares  
While Ferrari believes that shares of its stock are not stock of a PFIC for U.S. federal income tax purposes, this determination is based on current law and may be subject to change  
Ferrari - The consequences of the loyalty voting program are uncertain  
No statutory, judicial or administrative authority directly discusses how the receipt, ownership, or disposition of special voting shares will be treated for U.S. federal income tax purposes  
The fair market value of the special voting shares, which may be relevant to the tax consequences, is a factual determination  
The tax treatment of the loyalty voting program is unclear and shareholders are urged to consult their tax advisors  
Ferrari - Ferrari currently benefits or seeks to benefit from certain special tax regimes, which may not be available in the future  
Ferrari currently calculates taxes due in Italy based, among other things, on certain tax breaks recognized by Italy under the Law of Intellectual Property, No. 30 of 2014, Business continuity incentives and the supplemental (Financial Act 2015) issued in 2015  
Periodi correlati:

FY 2017

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