The company reports its financial results in accordance with accounting principles generally accepted in the United States ("GAAP" or referred to herein as "reported"). To supplement our consolidated financial statements reported on a GAAP basis, we provide the following non-GAAP financial measures: "comparable net revenues," "comparable currency neutral net revenues," "organic revenues," "comparable cost of goods sold," "comparable operating margin," "underlying operating margin," "comparable operating income," "comparable currency neutral operating income," "comparable EPS," "comparable currency neutral EPS," "underlying effective tax rate" and "free cash flow," each of which is defined below. Management believes these non-GAAP financial measures provide investors with additional meaningful financial information that should be considered when assessing our underlying business performance and trends. Further, management believes these non-GAAP financial measures also enhance investors' ability to compare period-to-period financial results. Non-GAAP financial measures should be viewed in addition to, and not as an alternative for, the company's reported results prepared in accordance with GAAP. Our non-GAAP financial measures do not represent a comprehensive basis of accounting. Therefore, our non-GAAP financial measures may not be comparable to similarly titled measures reported by other companies. Reconciliations of each of these non-GAAP financial measures to GAAP information are also included below. Management uses these non-GAAP financial measures in making financial, operating, compensation and planning decisions and in evaluating the company's performance. Disclosing these non-GAAP financial measures allows investors and management to view our operating results excluding the impact of items that are not reflective of the underlying operating performance.

DEFINITIONS

- "Currency neutral operating results" are determined by dividing or multiplying, as appropriate, our current period actual U.S. dollar operating results, by the current period actual exchange rates (that include the impact of current period currency hedging activities), to derive our current period local currency operating results. We then multiply or divide, as appropriate, the derived current period local currency operating results by the foreign currency exchange rates (that also include the impact of the comparable prior period currency hedging activities) used to translate the company's financial statements in the comparable prior year period to determine what the current period U.S. dollar operating results would have been if the foreign currency exchange rates had not changed from the comparable prior year period.
- "Structural changes" generally refer to acquisitions and divestitures of bottling operations, including the impact of intercompany transactions between our operating segments. In August 2022, the company acquired a controlling interest in a bottling operation in Malawi. The impact of this acquisition has been included in acquisitions, divestitures and structural changes in our analysis of net revenues on a consolidated basis as well as for the Bottling Investments and Europe, Middle East and Africa operating segments. In November 2022, the company refranchised our bottling operations in Cambodia, and in January 2023, the company refranchised our bottling operations in Vietnam. The impact of these refranchisings has been included in acquisitions, divestitures and structural changes in our analysis of net revenues on a consolidated basis as well as for the Bottling Investments and Asia Pacific operating segments.
- "Comparable net revenues" is a non-GAAP financial measure that excludes or has otherwise been adjusted for items impacting comparability (discussed further below). "Comparable currency neutral net revenues" is a non-GAAP financial measure that excludes or has otherwise been adjusted for items impacting comparability (discussed further below) as well as the impact of fluctuations in foreign currency exchange rates. Management believes the comparable net revenues (non-GAAP) growth measure and the comparable currency neutral net revenues (non-GAAP) growth measure provide investors with useful supplemental information to enhance their understanding of the company's revenue performance and trends by improving their ability to compare our period-to-period results. "Organic revenues" is a non-GAAP financial measure that excludes or has otherwise been adjusted for the impact of acquisitions, divestitures and structural changes, as applicable, and the impact of fluctuations in foreign currency exchange rates. Management believes the organic revenue (non-GAAP) growth measure provides users with useful supplemental information regarding the company's ongoing revenue performance and trends by presenting revenue growth excluding the impact of foreign exchange as well as the impact of acquisitions, divestitures and structural changes for the three months ended March 31, 2023 included the structural changes discussed above. Additionally, in July 2022, the company acquired certain brands in Asia Pacific. The impact of acquiring these

brands has been included in acquisitions, divestitures and structural changes in our analysis of net revenues on a consolidated basis as well as for the Asia Pacific operating segment for the three months ended March 31, 2023.

- "Comparable cost of goods sold" is a non-GAAP financial measure that excludes or has otherwise been adjusted for items impacting comparability (discussed further below). Management believes comparable cost of goods sold (non-GAAP) provides users with useful supplemental information regarding the company's ongoing cost of goods sold by improving their ability to compare our period-to-period results.
- "Comparable operating income" is a non-GAAP financial measure that excludes or has otherwise been adjusted for items impacting comparability (discussed further below). "Comparable currency neutral operating income" is a non-GAAP financial measure that excludes or has otherwise been adjusted for items impacting comparability (discussed further below) and the impact of fluctuations in foreign currency exchange rates. "Comparable operating margin" is a non-GAAP financial measure that excludes or has otherwise been adjusted for items impacting comparability (discussed further below). "Underlying operating margin" is a non-GAAP financial measure that excludes or has otherwise been adjusted for items impacting comparability (discussed further below), the impact of fluctuations in foreign currency exchange rates, and the impact of acquisitions, divestitures and structural changes, as applicable. Management uses these non-GAAP financial measures to evaluate the company's performance and make resource allocation decisions. Further, management believes the comparable operating income (non-GAAP) growth measure, comparable operating margin (non-GAAP) measure and underlying operating margin (non-GAAP) measure enhance its ability to communicate the underlying operating results and provide investors with useful supplemental information to enhance their understanding of the company's underlying business performance and trends by improving their ability to compare our period-to-period financial results.
- "Comparable EPS" and "comparable currency neutral EPS" are non-GAAP financial measures that exclude or have otherwise been adjusted for items impacting comparability (discussed further below). Comparable currency neutral EPS (non-GAAP) has also been adjusted for the impact of fluctuations in foreign currency exchange rates. Management uses these non-GAAP financial measures to evaluate the company's performance and make resource allocation decisions. Further, management believes the comparable EPS (non-GAAP) and comparable currency neutral EPS (non-GAAP) growth measures enhance its ability to communicate the underlying operating results and provide investors with useful supplemental information to enhance their understanding of the company's underlying business performance and trends by improving their ability to compare our period-to-period financial results.
- "Underlying effective tax rate" is a non-GAAP financial measure that represents the estimated annual effective income tax rate on income before income taxes, which excludes or has otherwise been adjusted for items impacting comparability (discussed further below).
- "Free cash flow" is a non-GAAP financial measure that represents net cash provided by operating activities less
 purchases of property, plant and equipment. Management uses this non-GAAP financial measure to evaluate the
 company's performance and make resource allocation decisions.

ITEMS IMPACTING COMPARABILITY

The following information is provided to give qualitative and quantitative information related to items impacting comparability. Items impacting comparability are not defined terms within GAAP. Therefore, our non-GAAP financial information may not be comparable to similarly titled measures reported by other companies. We determine which items to consider as "items impacting comparability" based on how management views our business; makes financial, operating, compensation and planning decisions; and evaluates the company's ongoing performance. Items such as charges, gains and accounting changes which are viewed by management as impacting only the current period or the comparable period, but not both, or as pertaining to different and unrelated underlying activities or events across comparable periods, are generally considered "items impacting comparability." Items impacting comparability include, but are not limited to, asset impairments, transaction gains/losses including associated costs, and charges related to restructuring initiatives, in each case when exceeding a U.S. dollar threshold. Also included are our proportionate share of similar items incurred by our equity method investees, timing differences related to our economic (non-designated) hedging activities, and timing differences related to unrealized mark-to-market adjustments of equity securities and trading

debt securities, regardless of size. In addition, we provide the impact that fluctuations in foreign currency exchange rates had on our financial results ("currency neutral operating results" defined above).

Equity Investees

During the three months ended March 31, 2023 and April 1, 2022, the company recorded a net loss of \$82 million and a net gain of \$5 million, respectively. These amounts represent the company's proportionate share of significant operating and nonoperating items recorded by certain of our equity method investees.

Transaction Gains/Losses

During the three months ended March 31, 2023, the company recorded gains of \$439 million and \$3 million related to the refranchising of our bottling operations in Vietnam and Cambodia, respectively.

During the three months ended March 31, 2023 and April 1, 2022, the company recorded charges of \$62 million and \$22 million, respectively, related to the remeasurement of our contingent consideration liability to fair value in conjunction with our acquisition of fairlife, LLC in 2020. Additionally, during the three months ended March 31, 2023 and April 1, 2022, the company recognized gains of \$151 million and \$12 million, respectively, related to the sale of a portion of our ownership interest in an unconsolidated bottling operation.

During the three months ended April 1, 2022, the company recorded a net loss of \$24 million as a result of one of our equity method investees issuing additional shares of its stock.

Restructuring

During the three months ended March 31, 2023 and April 1, 2022, the company recorded charges of \$27 million and \$10 million, respectively. The costs incurred were primarily related to certain initiatives designed to further simplify and standardize our organization as part of our productivity and reinvestment program.

During the three months ended March 31, 2023, the company recorded a charge of \$18 million, primarily related to severance costs associated with the restructuring of our North America operating unit.

During the three months ended April 1, 2022, the company recorded a gain of \$1 million, primarily related to a revision to estimated severance costs accrued in the prior year associated with our strategic realignment initiatives.

Other Items

Economic (Non-Designated) Hedges

The company uses derivatives as economic hedges primarily to mitigate the foreign exchange risk for certain currencies, certain interest rate risk, and the price risk associated with the purchase of materials used in our manufacturing processes as well as the purchase of vehicle fuel. Although these derivatives were not designated and/or did not qualify for hedge accounting, they are effective economic hedges. The changes in fair values of these economic hedges are immediately recognized in earnings.

The company excludes the net impact of mark-to-market adjustments for outstanding hedges and realized gains/losses for settled hedges from our non-GAAP financial information until the period in which the underlying exposure being hedged impacts our consolidated statement of income. Management believes this adjustment provides meaningful information related to the impact of our economic hedging activities. During the three months ended March 31, 2023 and April 1, 2022, the net impact of the company's adjustment related to our economic hedging activities resulted in an increase of \$2 million and a decrease of \$146 million, respectively, to our non-GAAP income before income taxes.

Unrealized Gains and Losses on Equity and Trading Debt Securities

The company excludes the net impact of unrealized gains and losses resulting from mark-to-market adjustments on our equity and trading debt securities from our non-GAAP financial information until the period in which the underlying securities are sold and the associated gains or losses are realized. Management believes this adjustment provides meaningful information related to the impact of our investments in equity and trading debt securities. During the three months ended March 31, 2023 and April 1, 2022, the net impact of the company's adjustment related to unrealized gains and losses on our equity and trading debt securities resulted in increases of \$32 million and \$130 million, respectively, to our non-GAAP income before income taxes.

Other

During the three months ended March 31, 2023 and April 1, 2022, the company recorded net charges of \$6 million and \$12 million, respectively, related to restructuring our manufacturing operations in the United States. Additionally, during the three months ended March 31, 2023 and April 1, 2022, the company recorded a net charge of \$4 million and a net gain of \$5 million, respectively, related to the BODYARMOR acquisition in 2021, which included various transition and transaction costs, employee retention costs and the amortization of noncompete agreements, net of the reimbursement of distributor termination fees.

Certain Tax Matters

During the three months ended March 31, 2023, the company recorded \$20 million of excess tax benefits associated with the company's stock-based compensation arrangements. The company also recorded net income tax expense of \$16 million for changes to our uncertain tax positions, including interest and penalties, and recorded a net income tax benefit of \$1 million associated with return to provision adjustments.

During the three months ended April 1, 2022, the company recorded \$54 million of excess tax benefits associated with the company's stock-based compensation arrangements. The company also recorded net income tax expense of \$34 million for changes to our uncertain tax positions, including interest and penalties, and recorded a net income tax benefit of \$4 million associated with return to provision adjustments.

(In millions except per share data)

	Three Months Ended March 31, 2023											
Net Cost of operating goods Gross revenues sold profit			Gross margin	Selling, general and administrative expenses	Other operating charges		perating ncome	Operating margin				
\$	\$ 10,980 \$ 4,317 \$ 6,663 60.7% \$		\$ 3,185	\$ 111	\$	3,367	30.7%					
	_		_		_		_	_		_		
	_		_		_		4	(62)		58		
	_		_		_		_	(45)		45		
	(21)		(35)		14		_	(4)		18		
				_	_		_					
\$	10,959	\$	4,282	\$	6,677	60.9%	\$ 3,189	\$ —	\$	3,488	31.8%	

_												
	Three Months Ended April 1, 2022											
Net Cost of operating goods Gross revenues sold profit		Gross margin	Selling, general and administrative expenses	Other operating charges	Operating income	Operating margin						
\$	10,491	\$ 4,091	\$ 6,400	61.0%	\$ 2,967	\$ 28	\$ 3,405	32.5%				
	_	_	_		_	_	_					
	_	_	_		_	(22)	22					
	_	_	_		l –	(9)	9					
	11	142	(131)		_	3	(134)					
	_	_	_		_	_	_					
\$	10.502	\$ 4.233	\$ 6.269	59.7%	\$ 2,967	s —	\$ 3.302	31.4%				

Net rating enues	Cost of goods sold	Gross profit	Selling, general and administrative expenses	Other operating charges	Operating income
5	6	4	7	296	(1)
(6)	(5)	(7)	(5)	_	(8)
11	11	11	13	_	7
	•			•	•
4	1	7	7	_	6

(5)

13

(9)

_								
	Net perating evenues	Cost of goods sold	Gross profit	Gross margin	Selling, general and administrative expenses	Other operating charges	Operating income	Operating margin
\$	10,980	\$ 4,317	\$ 6,663	60.7%	\$ 3,185	\$ 111	\$ 3,367	30.7%
	_	_	_		_	_	_	
	_	_	_		4	(62)	58	
	_	_	_		_	(45)	45	
	(21)	(35)	14		_	(4)	18	
	_	_	_		_	_	_	
\$	10,959	\$ 4,282	\$ 6,677	60.9%	\$ 3,189	\$ —	\$ 3,488	31.8%

	Three Months Ended April 1, 2022												
	Net perating evenues	Cost of goods sold	Gross profit	Gross margin	Selling, general and administrative expenses	Other operating charges	Operating income	Operating margin					
\$	10,491	\$ 4,091	\$ 6,400	61.0%	\$ 2,967	\$ 28	\$ 3,405	32.5%					
	_	_	_		_	_	_						
	_	_	_		l –	(22)	22						
	_	_	_		l –	(9)	9						
	11	142	(131)		l –	3	(134)					
ı													

Net operating revenues	Cost of goods sold	Gross profit
5	6	4
(6)	(5)	(7)
11	11	11

4	1	7
(6)	(5)	(7)
11	6	14

% Comparable Currency Impact (Non-GAAP)	(6)
% Change — Comparable Currency Neutral (Non-GAAP)	11

Reported (GAAP)

Equity Investees

Reported (GAAP)

Equity Investees

Restructuring Other Items **Certain Tax Matters** Comparable (Non-GAAP)

Items Impacting Comparability:

% Change — Reported (GAAP)

% Change — Currency Neutral (Non-GAAP)

% Change — Comparable (Non-GAAP)

% Currency Impact

Transaction Gains/Losses

Restructuring Other Items Certain Tax Matters Comparable (Non-GAAP)

Items Impacting Comparability:

Transaction Gains/Losses

Note: Certain columns may not add due to rounding.	Certain growth rates may not recalculate using the rounded dollar amounts provided.

(In millions except per share data)

Reported (GAAP)

Items Impacting Comparability:

Equity Investees

Transaction Gains/Losses

Restructuring

Other Items

Certain Tax Matters

Comparable (Non-GAAP)

Reported	(GAAP	1
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Items Impacting Comparability:

Equity Investees

Transaction Gains/Losses

Restructuring

Other Items

Certain Tax Matters

Comparable (Non-GAAP)

%	Change —	Reported	(GAAP)
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% Change — Comparable (Non-GAAP)

	Three Months Ended March 31, 2023													
Interest expense		Equity Other income (loss) (loss) — net — net		Income before income Income taxes taxes ¹		Effective tax rate	Net income ³		Diluted net income per share					
\$	372	\$	275	\$	615	\$	4,053	\$	940	23.2%	\$	3,107	\$	0.72
	_		82		_		82		3			79		0.02
	_		_		(589)		(531)		(233)			(298)		(0.07)
	_		_		_		45		11			34		0.01
	6		_		32		44		22			22		0.01
	_		_		_		_		5			(5)		_
\$	378	\$	357	\$	58	\$	3,693	\$	748	20.2% ²	\$	2,939	\$	0.68

				Thr	ee	Months	Enc	led Ap	ril 1, 2022					
inco Interest (los		quity come oss) net	ie income) (loss) it — net			ncome before ncome taxes		come xes ¹	Effective tax rate	in	Net icome ³	Diluted net income per share		
\$ 182	\$	262	\$	(105)	\$	3,458	\$	665	19.2%	\$	2,781	\$	0.64	
_		(5)		_		(5)		1			(6)		_	
_		_		12		34		(5)			39		0.01	
_		_		_		9		2			7		_	
6		_		131		(9)		(7)			(2)		_	
_		_				_		24			(24)		(0.01)	
\$ 188	\$	257	\$	38	\$	3,487	\$	680	19.5%	\$	2.795	\$	0.64	

Interest expense	Equity income (loss) — net	Other income (loss) — net	Income before income taxes	Income taxes ¹
105	5	_	17	41
101	39	55	6	10

	Net income ³	Diluted net income per share
	12	12
-	5	5

Note: Certain columns may not add due to rounding. Certain growth rates may not recalculate using the rounded dollar amounts provided.

¹ The income tax adjustments are the calculated income tax benefits (charges) at the applicable tax rate for each of the items impacting comparability with the exception of certain tax matters discussed above.

² This does not include the impact of the ongoing tax litigation with the U.S. Internal Revenue Service, if the company were not to prevail.

³ This represents net income attributable to shareowners of The Coca-Cola Company.

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Diluted Net Income Per Share:

	Three Months Ended March 31, 2023
% Change — Reported (GAAP)	12
% Currency Impact	(6)
% Change — Currency Neutral (Non-GAAP)	18
% Impact of Items Impacting Comparability (Non-GAAP)	7
% Change — Comparable (Non-GAAP)	5
% Comparable Currency Impact (Non-GAAP)	(7)

Note: Certain columns may not add due to rounding.

% Change — Comparable Currency Neutral (Non-GAAP)

(In millions)

Net Operating Revenues by Operating Segment and Corporate:

Europe,

23

	Three Months Ended March 31, 2023																
Mid	urope, dle East Africa		Latin merica				Asia Pacific	Blobal entures		Bottling vestments	Co	orporate	Eliminations		Cc	nsolidated	
\$	2,024	\$	1,386	\$	3,904	\$	1,371	\$	707	\$	1,946	\$	25	\$	(383)	\$	10,980
	(13)		1		(1)		(8)		_		_		_		_		(21)
\$	2,011	\$	1,387	\$	3,903	\$	1,363	\$	707	\$	1,946	\$	25	\$	(383)	\$	10,959

Reported (GAAP)

Items Impacting Comparability: Other Items Comparable (Non-GAAP)

Reported (GAAP)

Items Impacting Comparability: Other Items Comparable (Non-GAAP)

	Three Months Ended April 1, 2022																
Mid	urope, dle East Africa				North merica				Blobal entures		Bottling vestments	Corporate		Eliminations		Co	onsolidated
\$	1,833	\$	1,214	\$	3,590	\$	1,411	\$	729	\$	2,044	\$	25	\$	(355)	\$	10,491
	(2)		15		_		(2)		_		_		_		_		11
\$	1,831	\$	1,229	\$	3,590	\$	1,409	\$	729	\$	2,044	\$	25	\$	(355)	\$	10,502

% Cr	nange —	Reported	(GAAP)
------	---------	----------	--------

% Currency Impact

% Change — Currency Neutral (Non-GAAP)

% Acquisitions, Divestitures and Structural Changes

% Change — Organic Revenues (Non-GAAP)

% Change — Comparable (Non-GAAP

% Comparable Currency Impact (Non-GAAP)

% Change — Comparable Currency Neutral (Non-GAAP)

	Middle East & Africa	Latin America	North America	Asia Pacific	Global Ventures	Bottling Investments	Corporate	Eliminations	Consolidated
	10	14	9	(3)	(3)	(5)	3	(8)	5
	(13)	(5)	0	(8)	(8)	(9)	(1)	_	(6)
	23	19	9	5	5	5	4	_	11
	0	0	0	2	0	(7)	0	_	(1)
	23	19	9	3	5	11	4		12
AP)	10	13	9	(3)	(3)	(5)	3		4
(F)	10	13	9	(3)	(3)	(3)	3	_	4
	(14)	(6)	0	(8)	(8)	(9)	(1)	_	(6)

5

5

Note: Certain columns may not add due to rounding. Certain growth rates may not recalculate using the rounded dollar amounts provided.

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(In millions)

Operating Income (Loss) by Operating Segment and Corporate:

			Three	M	onths E	nde	d March	31	I, 2023				
Mid	urope, dle East Africa	Latin merica	North merica		Asia Pacific		Global entures	In	Bottling vestments	C	Corporate	Co	onsolidated
\$	1,135	\$ 853	\$ 1,033	\$	563	\$	51	\$	139	\$	(407)	\$	3,367
	_	_	_		_		_		_		58		58
	_	_	18		_		_		_		27		45
	(13)	1	37		(8)		3		(6)		4		18
\$	1,122	\$ 854	\$ 1,088	\$	555	\$	54	\$	133	\$	(318)	\$	3,488

Items Impacting Comparability: Transaction Gains/Losses Restructuring Other Items Comparable (Non-GAAP)

			Thre	e	Months E	nded Apr	il	1, 2022				
Mid	urope, dle East Africa	Latin merica	North merica		Asia Pacific	Global Ventures		Bottling Investments	Corpo	rate	Consolidat	ed
\$	1,007	\$ 760	\$ 1,056	\$	664	\$ 51		\$ 193	\$ (326)	\$ 3,4	05
	_	_	_		_	_	-	_		22	:	22
	(1)	_	_		_	_	-	_		10		9
	(2)	15	(155)		(2)	1		(5)		14	(1:	34)
\$	1,004	\$ 775	\$ 901	\$	662	\$ 52		\$ 188	\$ (280)	\$ 3,3	02

Reported (GAAP) Items Impacting Comparability:

Reported (GAAP)

Transaction Gains/Losses
Restructuring
Other Items
Comparable (Non-GAAP)

% Change — Reported (GAAP)	
% Currency Impact	

% Change — Currency Neutral (Non-GAAP)

% Impact of Items Impacting Comparability (Non-GAAP)

% Change — Comparable (Non-GAAP)

% Comparable Currency Impact (Non-GAAP)

% Change — Comparable Currency Neutral (Non-GAAP)

Europ Middle E & Afric	ast Latin	North a America	Asia Pacific	Global Venture			e Consolidated
13	12	(2)	(15)	1	(28)	(25)	(1)
(16)	(6)	0	(8)	(1)	(7)	(1)	(8)
28	18	(2)	(7)	2	(21)	(24)	7
1	2	(23)	1	(5)	1	(11)	(7)
12	10	21	(16)	6	(30)	(14)	6
(17)	(8)	0	(9)	(1)	(7)	(1)	(9)
28	18	21	(7)	8	(23)	(13)	15

Note: Certain columns may not add due to rounding. Certain growth rates may not recalculate using the rounded dollar amounts provided.

Operating Margin:

Reported Operating Margin (GAAP)

Items Impacting Comparability (Non-GAAP)

Comparable Operating Margin (Non-GAAP)

Comparable Currency Impact (Non-GAAP)

Comparable Currency Neutral Operating Margin (Non-GAAP)

Impact of Acquisitions, Divestitures and Structural Changes on Comparable Currency Neutral Operating Margin (Non-GAAP)

Underlying Operating Margin (Non-GAAP)

Three Months Ended March 31, 2023	Three Months Ended April 1, 2022	Basis Point Growth (Decline)	
30.66 %	32.45 %	(179)	
(1.16)%	1.01 %		
31.82 %	31.44 %	38	
(0.79)%	0.00 %		
32.61 %	31.44 %	117	
0.10 %	(0.10)%		
32.51 %	31.54 %	97	

Free Cash Flow (In millions):

Net Cash Provided by Operating Activities (GAAP)
Purchases of Property, Plant and Equipment (GAAP)

Free Cash Flow (Non-GAAP)

Three Months Ended March 31, 2023	Three Months End April 1, 2022	led	\$ Change
\$ 160	\$	323	\$ (463)
(276)	(2	217)	(59)
\$ (116)	\$ 4	106	\$ (522)

Projected 2023 Free Cash Flow (In billions):

Projected GAAP Net Cash Provided by Operating Activities¹
Projected GAAP Purchases of Property, Plant and Equipment

Projected Free Cash Flow (Non-GAAP)

Year Ending
December 31, 2023
\$ 11.4
(1.9)
\$ 9.5

¹ Does not include the impact of the ongoing tax litigation with the U.S. Internal Revenue Service, if the company were not to prevail.