

## **VISTEON CORPORATION SPIN-OFF BASIS ALLOCATION INFORMATION FOR FORD MOTOR COMPANY SHAREHOLDERS**

On June 28, 2000, Ford Motor Company ("Ford") distributed all of the common stock of Visteon Corporation ("Visteon") owned by Ford to Ford Common and Class B shareholders of record as of the close of business on June 12, 2000. Unless you sold your right to receive Visteon shares before the distribution date, you recently received .130933 shares of Visteon for each Ford share you owned.

Ford has received an opinion from its outside advisors, Davis Polk & Wardwell, that a Ford shareholder's receipt of Visteon stock should be tax-free for U.S. Federal income tax purposes. If you sell your Visteon shares, you will have taxable gain or loss equal to the difference between your sales proceeds and your tax basis in the shares.

To determine your tax basis, you will have to allocate the tax basis that you had in your Ford shares between your Ford shares and your Visteon shares based on their relative fair market values on June 28, 2000. Based upon the average high and low composite prices of Ford and Visteon on the New York Stock Exchange on June 28, 2000, 96.07% of your pre-distribution tax basis in your Ford shares should be allocated to your Ford shares, and the remaining 3.93% should be allocated to your Visteon shares (including any fractional share interest). For example:

- Assume you own 100 shares of Ford stock with a \$35 per share basis for a total basis of \$3,500
- You received 13.0933 shares of Visteon stock as a result of the distribution.
- Your total basis in your Ford shares would be reduced to \$3,362.45 (96.07% of \$3,500), or \$33.62 per share (\$3,362.45 divided by 100 shares)
- Your total basis in your Visteon shares would be \$137.55 (3.93% of \$3,500), or \$10.51 per share (\$137.55 divided by 13.0933 shares).

**You should consult your tax advisor regarding the application of this calculation to your particular circumstances.**

If you received cash in lieu of a fractional share, you will be treated as having sold the fraction for the amount of cash received, and you would report gain or loss on that sale equal to the difference between your basis in the fractional share of Visteon (determined using the above methodology) and the amount of cash received.

If you acquired Ford shares on more than one occasion, you will need to perform this calculation separately for each group of shares.

All shareholders who received Visteon stock should make this basis allocation even if some or all of their Ford stock was sold after the record date and before the distribution date of Visteon stock.

You should retain this information to support the determination of your basis in your Ford and Visteon shares. **In order to assist you in complying with U.S. tax reporting requirements, we are attaching a form of statement to be completed by you and filed with your 2000 U.S. Federal income tax return.**

June 28, 2000

**DESCRIPTIVE STATEMENT  
FOR THE U.S. INTERNAL REVENUE SERVICE**

**(To be attached to tax return for the 2000 tax year)**

**Statement of shareholder receiving a distribution of common stock of Visteon Corporation (“Visteon”),  
a controlled corporation, pursuant to U.S. Treasury Regulations Section 1.355-5(b).**

1. On June 28, 2000, the undersigned, a shareholder of Ford Motor Company (“Ford”) as of June 12, 2000 received shares of Visteon’s common stock in a spin-off pursuant to Section 355 of the Internal Revenue Code (the “Code”).

2. Ford has been advised by counsel that the spin-off should qualify as a tax-free distribution under Section 355 of the Code. The result of a tax-free distribution is that no gain or loss will be recognized by the stockholders of Ford upon their receipt of shares of Visteon’s common stock in the spin-off, except to the extent of gain attributable to any cash received in lieu of a fractional share of Visteon’s common stock.

3. The names, addresses and IRS employer identification numbers of the corporations involved are:

(a) Ford Motor Company  
The American Road  
Dearborn, MI 48121  
Employer identification number: 38-0549190

(b) Visteon Corporation  
5500 Auto Club Drive  
Dearborn, MI 48126  
Employer identification number: 38-3519512

4. The undersigned did not surrender any stock or securities of Ford in connection with the spin-off.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Shareholder Signature