

Anti-Corruption Policy

August 2022

1. Purpose & Scope

- 1.1. Ensure that Nemak, S.A.B. de C.V., its subsidiaries and affiliates (together hereinafter, "Nemak"), employees, directors, officers, suppliers, contractors, customers and other third parties doing business with Nemak comply with all applicable Anti-Corruption Laws.
- 1.2. Reaffirm our commitment to strive for a culture of integrity, honesty, transparency and accountability everywhere we operate and in accordance with the highest level of ethical standards, while striving to ensure that our operations and activities comply with all applicable Anti-Corruption Laws.
- 1.3. Establish the basic principles and framework for preventing, detecting, investigating and remedying any corrupt or bribery acts and, if applicable, apply the corresponding penalties and other disciplinary action.
- 1.4. This Global Anti-Corruption Policy is applicable to, and intended for, all subsidiaries and affiliates, employees, directors, officers, suppliers, contractors, customers and other third parties doing business with Nemak.

2. Definitions

- a) **Anti-Corruption Laws:** the Mexican General Law of Administrative Liabilities (*Ley General de Responsabilidades Administrativas*), the U.S. Foreign Corrupt Practices Act of 1977, the UK Bribery Act of 2010, and the rules and regulations promulgated thereunder, and all other laws, rules, and regulations of any jurisdiction where Nemak does business and has operations concerning or relating to bribery or corruption.
- b) **Corrupt or bribery acts:** Offer, promise, pay or receive cash or cash equivalents (e.g., checks, money orders, gift cards, etc.), stock, products, raw materials, discounts on products and services not readily available to the public, gifts, handouts, entertainment, travel, employment opportunities, donations, accommodations, contributions or any anything else of value, to any individual or entity, to improperly influence their acts or decisions in order to obtain an unfair or unlawful benefit or advantage, either personal or for the company. The mere act of offering or promising any kind of wrongful compensation, even if the act has not yet been completed is, by itself, an act of corruption.
- c) **Conflicts of Interest:** There is a Conflict of Interest whenever a situation of any of our employees (due to their position, time, resources or information) puts them in a position were a decision made on behalf of Nemak may render an improper benefit either to themselves, their families and/or their relatives. A Conflict of Interest may also occur due to the relationship of an employee with a third party that would impair such employee's judgment to perform his/her job responsibly, or lead to a misuse of such employee's position, authority or influence inside the company. A relationship of an employee with a third party includes a blood relative, in-laws and relatives by election.

3. General Guidelines

- 3.1. We expect all employees, directors, officers, suppliers, contractors, customers and other third parties doing business with Nemak to perform their duties in accordance with applicable laws, rules, and regulations and in an ethical manner.

3.2. We strive to ensure that all our operations and activities comply with all applicable Anti-Corruption Laws.

3.3. It is strictly prohibited that employees or contractors engage, order, authorize, promise, conspire, induce or perform corrupt or bribery acts, either directly or through third parties.

3.4. Relationships with other companies or institutions

Nemak values its business relationships with customers and suppliers, and expect employees to treat customers and suppliers honestly and with respect. It is strictly prohibited for Nemak employees to offer, solicit, pay or receive any kind of economic compensation, or anything of value from or to customers, suppliers, contractors, government officials and other third parties or organizations or entities in order to obtain an unfair or improper business advantage.

3.5. Relationships with authorities

It is strictly prohibited to perform corrupt or bribery acts when engaging with any kind of authority including government officers or government-owned entities, as well as members of political parties, or candidates for public offices, with the purpose of inducing or causing an action or inaction to obtain a benefit, either personal or for the company.

3.6. Gifts and hospitalities

Nemak employees must never offer or solicit gifts, services, and favors in exchange for preferential treatment in any business dealing. Any gifts, handouts, entertainment, accommodations, services, or favors that an employee either accepts or provides to any third parties must be in accordance to reasonable business practices and must not compromise, or appear to compromise, the employee's ability to make objective business decisions in the best interest of Nemak.

3.7. Accounting records

The recording, safekeeping, and preparation of financial and company reports for Nemak's different stakeholders must strictly adhere to national, state, and local laws and regulations, and generally accepted accounting principles and control guidelines. We expect those employees involved in creating, processing or recording information to maintain its integrity. Employees must never alter or falsify documents, records, invoices, payments or reports, or conceal information that may alter the interpretation of financial or any other relevant company information.

3.8. Conflicts of Interest

Conflicts of interest arise when a personal interest of a Nemak employee interferes or even appears to interfere, with the best interests of Nemak. Nemak employees shall always act in the best interests of Nemak. Nemak has the policy of avoiding any decision made by any of its employees that is or even appears to be made in a Conflict of Interests situation. At the time of occurring, or presuming the existence of this kind of situation, the employee will report it to employee's supervisor and, upon the supervisor's judgment, refrain from making any individual decision transferring such tasks to the immediate supervisor or a competent third party that would guarantee an impartial judgment.

3.9. Political donations

Political donations may never be made to obtain or retain business or any undue advantage in favor of Nemak. Written approval from the appropriate BU Vice President and the Legal

Department is required before the contribution is made. Applicable law in various jurisdictions may restrict or prohibit payments or contributions to political parties or candidates for public office. The Legal Department may retain external counsel in the country in which the relevant contribution is to be made, for the purpose of having external counsel confirm whether or not such contribution is permitted under applicable law and, if permitted, how it shall be documented and executed.

3.10. Donations

Donations may raise issues under applicable Anti-Corruption Laws, particularly when a donation is made to a charitable organization associated with a government official. Donations may as well be prohibited under applicable law. Donations, whether in kind or in cash, may only be made to registered and reputable charitable organizations and must not be made to obtain or retain a business advantage, nor a special service from a third party. The Legal Department may retain external counsel in the country in which the relevant donation is to be made, for the purpose of having external counsel confirm whether or not such donation is permitted under applicable law and, if permitted, how it shall be documented and executed.

3.11. Disciplinary measures

- a) Employees or contractors in breach of this Policy are subject to disciplinary actions ranging from a warning to termination of employment or contract. The severity of such disciplinary actions will depend on the seriousness of the breach and on whether the breach came from an error, willful misconduct, or negligent action. Employees or contractors may also be subject to civil and criminal penalties if the law has been breached.
- b) While individuals cannot insulate themselves from discipline or the applicable scope of any pertinent laws by reporting their own violations, self-reporting may, in appropriate circumstances and subject to applicable laws, be considered as a mitigating factor in any disciplinary action.

3.12. Reporting

- a) Nemak will fully support any Nemak personnel or third parties who decline to engage in conduct that would place Nemak's ethical principles and reputation at risk. As such, Nemak strongly encourages reporting and/or raising concerns in good faith with respect to any known or suspected violations of this Policy or applicable Anti-Corruption Laws. This Policy expressly prohibits a reporting person of performing their own preliminary investigations. Investigations of alleged violations may involve complex legal issues, and if a reporting person acts alone without proper guidance, they may compromise the integrity of an investigation and adversely affect both themselves and Nemak.
- b) Employees may raise concerns or report violations as follows:
 - **Within the business unit or global staff department**
An employee's Human Resources manager will be able to resolve any concerns or questions that the employee might have.
 - **Nemak's Internal Control & Governance and Legal & Compliance Departments**
Employees may report concerns to Nemak's Internal Control & Governance Department and the Legal & Compliance Department by sending an e-mail to: governance@nemak.com.
 - **Integrity and Transparency Helpline**
Nemak has established a toll-free Integrity and Transparency Helpline in the countries

listed below. Any individual may submit anonymous reports to the Integrity and Transparency Helpline, or else, may indicate that they wish to be contacted. Consistent with its obligations under applicable law, Nemak, to the extent reasonably possible, will keep confidential the identity of anyone reporting in good faith any actual or suspected violation of this Policy or applicable Anti-Corruption Laws.

Argentina	0800-444-5685
Austria	0800-293-215
Brazil	0800-892-2016
Canada	1-866-238-2860
China	+86-21-2068-9511
Czech Republic	800-701-160
Germany	0800-180-8939
Hungary	06-800-16476
India	000-800-100-5794
Mexico	800-265-2532
Poland	00800-112-4028
Russia	880-0301-7408
Slovakia	0800-606-251
Turkey	0800-621-8888
USA	1-866-482-1957

A report may also be submitted via e-mail to:

transparency@alfa.com.mx.

- **No retaliation**

Nemak strictly prohibits retaliation against any individual who raises concerns in good faith regarding actual or suspected misconduct related to this Policy. Such retaliation would be grounds for discipline, against whoever intends to exercise it, including potential termination of employment. According to its obligations under applicable law and the enforcement processes established in Nemak's internal policies, Nemak will keep confidential the identity of anyone reporting a possible wrongdoing to the extent reasonably possible. No one will have his or her job terminated, demoted, suspended, harassed, or discriminated against solely because they reported a possible violation.

4. Contact Information

For questions or comments about this Policy, please contact Nemak's Internal Control & Governance Department and the Legal & Compliance Department by sending an e-mail to governance@nemak.com.

5. Revisions

- 0, July– 2016
- 1, January – 2017
- 2, May – 2019
- 3, August – 2022

6. Created / Approved by

Created by: Global Legal & Compliance Manager – Finance – August 2022

Approved by: Global Audit & Legal Director – Finance – August 2022