

Violence and Harassment Policy

February 2025

English

1. Purpose & Scope

- 1.1. Promote and respect human rights both within the Company and throughout its value chain.
- 1.2. Foster, cultivate, and preserve a culture of respect, free from violence and harassment.
- 1.3. This Policy is applicable to all Nemak employees, contractors, suppliers, customers and any third parties interacting with Nemak, irrespective of their location, and covers all work-related activities and settings, including but not limited to, manufacturing sites, offices, remote work, business travel, off-site events, client sites and virtual platforms.

2. Definitions

- a) **Workplace Violence and Harassment:** Includes various forms of inappropriate behavior and actions, occurring between colleagues, supervisors, subordinates, or involving third parties such as clients, customers, or the public. These behaviors may include, but are not limited to, threats, irrespective of their frequency or severity, and whether intended to cause physical, emotional, sexual, or financial harm, potentially involving gender-based violence and harassment. This includes verbal, written, or online forms of misconduct.

3. General Guidelines

3.1. Rights and Responsibilities:

All Nemak employees, contractors, suppliers, customers and third parties should:

- a) Report any incident through the following channels: their direct manager or next-level manager, human resources manager or director, the local workers' council (where given/applicable), and the transparency helpline.
- b) Treat everyone with respect and refrain from engaging in any acts of violence and harassment. Additionally, the company outlines the expected behaviors of Nemak employees through the Human Rights, Diversity & Inclusion, and Code of Conduct policies and our company's values at all times.
- c) Cooperate in the investigation of incidents of violence and harassment and maintain confidentiality, when necessary.

3.2. Roles' Accountability:

- a) **Direct Supervisors:** Ensure that no individual within their team is subjected to any form of violence and harassment, including gender-based violence, or promptly intervene at the first indication.
- b) **Human Resources:** Implement preventive measures to mitigate the risk of violence and harassment, including risk management and providing information and training to employees.
- c) **Process Assessment and Governance:** Facilitate accessible channels and safe spaces for all Nemak stakeholders to raise concerns or report violations to this Policy without fear of reprisal. Furthermore, promptly, confidentially, and impartially investigate any complaints or reports of violence and harassment.
 - Monitor effectiveness of reporting and investigation mechanisms
 - Ensure disciplinary actions are applied consistently and transparently

3.3. Violence and Harassment Complaints Management:

- a) Complaints Procedure, Confidentiality and Protection against Retaliation:

- We expect employees and stakeholders to report all known or suspected violations of this policy without fear of reprisal through one of the following channels:
 - The direct manager or next-level manager
 - The Human Resources manager or director
 - The local workers' council (where given/applicable)
 - The Process Assessment and Governance department of Nemak, as well as the Legal and Compliance department of Nemak by email to (governance@nemak.com)
 - Transparency Helpline (<https://www.nemak.com/transparency-helpline/>)
- b) Confidentiality and Protection against Retaliation
 - All complaints and investigations will be treated confidentially, with information disclosed strictly on a need-to-know basis.
 - No individual will be subjected to retaliation for making a complaint, and adequate measures will be taken to ensure the complainants, victims and witnesses are protected against retaliation during and after the investigation.
 - All information pertaining to a complaint will be securely maintained.
- c) Sanctions and Disciplinary Actions:
 - Any individual found to have committed any form of violence and/or harassment will be subject to disciplinary actions, which may include verbal or written warnings, suspension, or dismissal.

4. Contact Information

For any question or clarification regarding this Policy, please contact the Human Resources, Process Assessment and Governance, or Legal and Compliance departments.

5. Revisions

0- October – 2024

1- February – 2025

6. Created / Approved by

Approved: CEO – September – 2024

Created: Talent Attraction and Diversity & Inclusion COE – Global HR

7. Related Documents

- 7.1. [Nemak Code of Conduct](#)
- 7.2. [Global Diversity & Inclusion Policy](#)
- 7.3. [HSE Policy](#)
- 7.4. [Nemak Business Code for Suppliers](#)

Corporate Statement on Violence and Harassment

At Nemak, we uphold the fundamental right of every individual to work in a safe, respectful, and inclusive environment, free from violence and harassment, we are committed to fostering a culture of respect, dignity, and safety for all individuals across our global operations. As a leading automotive company, we recognize the importance of promoting a work environment free from violence and harassment.

The company maintains a zero-tolerance policy towards violence and harassment. Nemak strictly prohibits, under any circumstances, all forms of hostility, violence, retaliation, intimidation, bullying, discrimination, and harassment, including sexual, verbal, psychological, and physical. We firmly believe that every employee, supplier, customer, and any third-party interacting with Nemak should be able to work in an environment where they feel safe, valued, and respected.