



# Code of Conduct

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Our values and behaviors are the foundation of our Code.

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Governance and Compliance – 2025

### EMPLOYEE ACKNOWLEDGEMENT FORM

I hereby acknowledge that I have received, read and understood Nemak's Code of Conduct and that I agree to comply with its terms, as well as with all related policies and procedures as a fundamental condition of my employment. I commit to reporting, without delay, any suspected or actual violations of the Code, policies, or applicable laws. If I have any questions about the interpretation or application of this Code, I will seek guidance from my Human Resources Manager.

Employee Name: \_\_\_\_\_

Employee Number: \_\_\_\_\_

Job Title: \_\_\_\_\_

Site: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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# 01

## Introduction

**As a leading provider of innovative lightweighting solutions for the global automotive industry, Nemak is committed to fostering a positive work environment for its employees and maintaining the highest standards of ethical business conduct across all regions.**

This Code of Conduct (the "Code") reflects our commitment to a culture of integrity, honesty, and accountability. It sets forth the basic principles and policies that all employees must observe and provides practical guidance to translate these principles into everyday actions and behaviors that support our company's values.



**CUSTOMER  
FOCUS**



**TRUST AND  
COLLABORATION**



**INNOVATION**



**RESPECT AND  
RESPONSIBILITY**

We expect all employees to comply with this Code and seek guidance from their Human Resources Manager in case of any questions regarding any specific practices or situations. While this Code does not cover all possible scenarios, it provides a common framework to help employees understand and navigate ethical challenges and uphold Nemak's values.

Employees are responsible for regularly reviewing and understanding this Code and all other Nemak's policies and guidelines. Compliance with these is essential to fostering a respectful, lawful, and professional work environment.

# 02

## Compliance with Laws and Regulations

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**We expect all employees to perform their duties in accordance with applicable laws, rules, regulations and ethical standards.**

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All employees are expected to seek advice from their Human Resources Manager if they have questions as to whether any particular practice or activity is acceptable.

Additionally, we expect our business partners—including our customers, contractors, suppliers, and third parties—to comply with all applicable laws, rules, and regulations and uphold the ethical standards set forth in this Code.

# 03

## Personnel

### 3.1 Human Rights

Nemak is committed to upholding human rights across all its operations and ensuring that all employees are treated with dignity and respect. We enforce the following principles at all our locations:

#### 3.1.1 Child Labor

We prohibit child labor. We do not employ any person under the age of 15 or below the legal minimum working age, if higher.

#### 3.1.2 Forced Labor

We categorically reject all forms of forced or involuntary labor.

#### 3.1.3 Compensation

We provide fair compensation and benefits in accordance with applicable laws.

#### 3.1.4 Working Hours

We comply with all applicable laws regulating working hours.

#### 3.1.5 Freedom of Association

We recognize and respect employees' rights to freedom of association and collective bargaining. In locations where these rights are restricted, we provide alternative channels for employees to express concerns.

#### 3.1.6 Diversity and Inclusion

We prohibit discrimination in any form and are committed to providing our employees with equal employment opportunities, regardless of personal characteristics such as age, gender, race, ethnic background, national origin, religion, or disability.

For further guidance, please refer to the Global Diversity & Inclusion Policy.

### 3.1.7 Anti-Harassment

We support work environments that are free of hostility, and physical or verbal harassment. We do not tolerate under any circumstance, harassment of any kind: sexual, workplace, or physical, among others.

For more information, please refer to the Violence and Harassment Policy.

For further guidance, please refer to the Global Human Rights Policy.

### 3.2 Substance Abuse

At work, all employees must remain free from the influence of illegal drugs or any substances that impair their judgment or ability to work safely and effectively. We encourage anyone having a substance abuse problem to seek appropriate assistance.

### 3.3 Occupational Health and Safety

Nemak provides and maintains a work environment that meets or exceeds applicable occupational health and safety standards. Employees must follow health and safety protocols and report accidents, injuries, and any unsafe equipment, practices, or conditions.

For more information, please refer to the Global Health, Safety and Environmental Policy.

### 3.4 Environment

We are committed to responsible and sustainable environmental practices, including waste reduction, recycling, and energy conservation. We strive to make sustainable use of resources and to minimize environmental impact in all business operations.

For more information, please refer to the Biodiversity and Ecosystem Services Policy.

### 3.5 Political Activities

We respect our employees' rights to participate in political activities of their choice, as long as such participation is strictly on a personal basis and does not interfere with the performance of work-related duties. Employees must refrain from using Nemak's name or logos or any other form of corporate identity for political purposes.

## 04 Business Practices

### 4.1 Confidential and Proprietary Information

Confidential and proprietary information is a valuable asset and must be managed effectively and securely. Employees often have access to confidential or proprietary information about Nemak, its customers, suppliers, and third parties. Employees must protect the confidentiality of such information, except when disclosure is authorized or legally required.

### 4.2 Anti-Corruption, Bribery and Fraud

Nemak strictly prohibits corruption, bribery and fraudulent practices, either directly or through third parties. Employees and contractors must not engage in, authorize, or facilitate such practices.

For more information, please refer to the Anti-Corruption Policy.

### 4.3 Anti-Money Laundering

At Nemak, we comply with applicable anti-money laundering laws and regulations. Employees are strictly prohibited from engaging in or facilitating any activity involving funds of illegal origin and shall refrain from conducting business with anyone known to be involved in financial misconduct or illicit transactions.

For more information, please refer to the Anti-Money Laundering and Sanctions Compliance Policy.

### 4.4 Protection of Personal Data

Nemak is committed to protecting the personal data of all employees and to complying with applicable data protection laws. Access to personal data is restricted to authorized personnel on a need-to-know basis within Nemak. We ensure that personal data is strictly processed in compliance with legal requirements and under robust data security measures.

#### 4.5 Financial Records Integrity

The recording, safekeeping, and preparation of financial and company reports for Nematik's different stakeholders must strictly comply with applicable 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. Tampering with, altering or falsifying documents, records, invoices, payments or reports, and concealing information that may alter the interpretation of financial information, are all strictly prohibited.

#### 4.6 Relations with Suppliers and Customers

We value our business relationships with customers and suppliers, and expect employees to engage with them with integrity and professionalism. Unfair, deceptive or misleading practices in interactions with customers or suppliers are strictly prohibited.

For further guidance, please refer to the Global Business Code for Suppliers.

#### 4.7 Gifts and Business Courtesies

Employees must never offer or accept gifts, meals, entertainment, hospitalities, services, favors, or any other business courtesy or item of value that might compromise, or appear to compromise, the employee's ability to make objective business decisions in the best interest of Nematik.

Employees are prohibited from soliciting any gift, meal, entertainment, hospitality, favor, service, or any other item of value or personal benefit.

It is strictly forbidden to accept, offer, promise or give cash or cash equivalent gifts under any circumstances.

For further guidance, please refer to the Anti-Corruption Policy, or consult your Human Resources Manager, the Governance Department or the Compliance Department.

#### 4.8. Conflict of Interest

All employees have the obligation to act honestly and ethically, and in the best interest of Nematik. A conflict of interest occurs when a person's or entity's vested interests raise a question of whether their actions, judgment, and/or decision-making can be unbiased. Any employee who is facing a real or potential conflict of interest must contact the Governance Department and the Compliance Department.

#### 4.9 Business Relations with Direct Family Members

If an employee's direct family member\* is employed by or has investments in a competitor or supplier of Nematik or a bank servicing Nematik, it may constitute a conflict of interest, especially if the employee has discretionary authority in dealing with the same as part of their job at Nematik or their relative deals with Nematik on behalf of the same. Such situations call for extra sensitivity to security, confidentiality, and conflicts of interest. The closeness of the relationship could lead the employee to inadvertently compromise Nematik's interests.

Any employee who becomes aware of a conflict or a potential conflict involving a direct family member should notify his/her Human Resources Manager, the Governance Department and the Compliance Department.

*\*Spouse, partner, parent, step-parent, child, step-child, sibling, step-sibling, nephew, niece, aunt, uncle, grandparent, grandchild and in-laws.*

#### 4.10 Insider Trading

During the course of employment, employees may learn "inside information" about Nematik or other companies. All non-public information should be considered inside information and must never be disclosed or used for personal gain. This includes, buying or selling stock or other securities, or making any investment decisions based on such information.

For more information, please refer to the Administration and Management of Confidential and Privileged Information Policy.

#### 4.11. Proper Use of Company's Assets

Nemak employees must protect all company assets, ensuring they are used in accordance with this Code and safeguard installations where employees work or visit.

##### 4.11.1 Use of Information Technology Infrastructure (internet, e-mail, telephones and other electronic devices)

Employees must not make any illegal, unethical, unauthorized, or disruptive use of Nemak's Information Technology infrastructure. This includes, for example, accessing, transmitting or storing inappropriate material (i.e., adult content, pornography, violent material, chain letters, offensive/demeaning material related to age, race, ethnic background, gender, religion, national origin, disability, or sexual orientation). For further guidance, please refer to the IT Infrastructure Acceptable Use Policy.

#### 4.12 External Communications

##### 4.12.1 Mass Media

Employees are not permitted to share information about the company's business activities or financial performance with representatives of the mass media or other external organizations unless they receive authorization from their respective Business Unit Director or VP. Please refer any media inquiries to your regional communications manager and the Global Communications Department ([nemakglobalcommunications@nemak.com](mailto:nemakglobalcommunications@nemak.com)).

##### 4.12.2 Social Media

Employees who wish to publish or post information on social media mentioning Nemak, and who are not the official spokespersons of the Company, need to clarify that the posting is a personal opinion that does not represent in any way an official statement of Nemak.

For further guidance regarding external communications matters, please refer to the Global Communication Policy.

# 05

## Infringements and Penalties

**If you are unsure about the proper course of action or how this Code should be interpreted in any particular situation, be sure to seek guidance from the Governance Department or the Compliance Department.**

#### WITHIN THE BUSINESS UNIT OR GLOBAL STAFF AREA

Generally, an employee's Human Resources Manager will be able to resolve any concerns or questions they may have.

#### GOVERNANCE & COMPLIANCE

Employees may report concerns to the Governance Department and the Compliance Department by sending an email to [governance@nemak.com](mailto:governance@nemak.com).

#### TRANSPARENCY HELPLINE

Nemak has established a Transparency Helpline through which employees may report any situation that is not aligned with, or that may be a violation of, any applicable law or regulation, this Code, or any other of Nemak's values, procedures or policies.

Employees may submit reports anonymously or indicate that they wish to be contacted, by accessing the following link: <https://secure.ethicspoint.com/domain/media/en/gui/97874/index.html>, or else, they can send an email to: [transparency@nemak.com](mailto:transparency@nemak.com).

If you wish to report by phone, see below a list of toll-free numbers (available 24/7) to which you may call depending on your country of residence:

Argentina	0800-345-2711
Austria	0800 250 016
Brazil	0800 007 9006
China	400-120-1840
Czech Republic	800 050 954
Germany	0800 180 1952
Hungary	06 800 19385
India	0124 512 0063
Mexico	800 872 1779
Poland	800 005 482
Slovakia	0800 606 164
USA and Canada	1-833-675-6076
Spain	900 752 030
Turkey	00800-49240880158

All reports are handled confidentially. Nemak, prohibits any form of retaliation against individuals who, in good faith, report suspected violations or who cooperate in an investigation of a suspected violation reported by someone else.

In order to conduct a full investigation, we need as much specific, factual information as possible.

### 5.1 Penalties for Breaches

Employees in breach of this Code are subject to disciplinary actions ranging from a warning to termination of employment. 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 may also be subject to civil and criminal penalties if the law has been breached.





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