

TAX ADMINISTRATION SERVICE

TAX REPORTING SYSTEM 2023

TAXPAYER NAME: NEMAK, S.A.B. DE C.V.

ANNEX INFORMATION: REPORT

REPORT ON THE REVIEW OF THE TAX SITUATION OF THE TAXPAYER

TO THE BOARD OF DIRECTORS AND SHAREHOLDERS OF NEMAK, S.A.B. DE C.V.,

TO THE MINISTRY OF FINANCE AND PUBLIC CREDIT,

TO THE TAX ADMINISTRATION SERVICE,

TO THE GENERAL ADMINISTRATION OF LARGE TAXPAYERS AUDIT IN MEXICO CITY.

1. I ISSUE THIS REPORT IN CONNECTION WITH THE AUDIT I CONDUCTED UNDER THE INTERNATIONAL STANDARDS ON AUDITING (ISA) OF THE SEPARATE FINANCIAL STATEMENTS PREPARED BY THE MANAGEMENT OF NEMAK, S.A.B. DE C.V. IN ACCORDANCE WITH ARTICLES 32-A OF THE FEDERAL TAX CODE (CFF), 58 SECTIONS I, IV, AND V OF THE REGULATIONS OF THE CFF (RCFF), RULES 2.10.6, 2.10.14, 2.10.15 OF THE MISCELLANEOUS TAX RESOLUTION FOR 2023 (RMF), AND THE INSTRUCTIONS FOR INTEGRATION AND CHARACTERISTICS AND THE GUIDE FORMATS FOR THE PRESENTATION OF THE OPINION ON SEPARATE FINANCIAL STATEMENTS FOR TAX PURPOSES CONTAINED IN ANNEX 16 OF THE RMF. AN AUDIT CONDUCTED IN ACCORDANCE WITH THE ISA PROVIDES A REASONABLE LEVEL OF ASSURANCE; HOWEVER, IT DOES NOT GUARANTEE THAT AN AUDIT WILL DETECT ANY POSSIBLE OMISSION, ERROR, OR CONDUCT THAT MAY CONSTITUTE A TAX OFFENSE, AS IT IS NOT DESIGNED FOR SUCH PURPOSE.

AS A RESULT OF THIS AUDIT, I ISSUED AN UNQUALIFIED REPORT DATED MAY 14, 2024.

2. EXCLUSIVELY FOR THE MATTERS MENTIONED IN THIS SECTION 2, I DECLARE, UNDER OATH OF TRUTHFULNESS, BASED ON ARTICLES 52 SECTION III OF THE CFF, 57 AND 58 SECTION III OF THE RCFF, AND RULE 2.10.15 OF THE RMF, THAT:

A. REGARDING THE AUDIT CONDUCTED IN ACCORDANCE WITH THE ISA ON THE SEPARATE FINANCIAL STATEMENTS OF NEMAK, S.A.B. DE C.V. (THE ENTITY) FOR THE YEAR ENDED DECEMBER 31, 2023, TO WHICH I REFER IN THE PREVIOUS SECTION, I ISSUED MY OPINION WITHOUT QUALIFICATIONS THAT WOULD AFFECT THE TAX SITUATION OF THE TAXPAYER.

B. AS PART OF MY AUDIT DESCRIBED IN THE PREVIOUS SECTION, I REVIEWED THE INFORMATION AND ADDITIONAL DOCUMENTATION PREPARED BY AND UNDER THE RESPONSIBILITY OF THE ENTITY, IN ACCORDANCE WITH ARTICLES 32-A OF THE CFF, 58 SECTIONS I, IV, AND V OF THE RCFF, RULES 2.10.6, 2.10.7, 2.10.14 OF THE RMF, AND THE GUIDE FORMATS AND INSTRUCTIONS FOR INTEGRATION AND CHARACTERISTICS FOR THE PRESENTATION OF THE OPINION ON SEPARATE FINANCIAL STATEMENTS FOR

TAX PURPOSES CONTAINED IN ANNEX 16 OF THE RMF, WHICH IS SUBMITTED THROUGH THE 2023 TAX OPINION REPORTING SYSTEM (SIPRED) VIA THE INTERNET TO THE SAT. I AUDITED THIS INFORMATION AND DOCUMENTATION THROUGH SELECTIVE TESTING, USING AUDIT PROCEDURES AND SCOPES THAT I CONSIDERED APPROPRIATE UNDER THE CIRCUMSTANCES, BASED ON MY PROFESSIONAL JUDGMENT. I BELIEVE THAT THE AUDIT EVIDENCE I HAVE OBTAINED PROVIDES A SUFFICIENT AND APPROPRIATE BASIS TO SUPPORT MY OPINION, IN ACCORDANCE WITH THE ISA, ON THE SEPARATE FINANCIAL STATEMENTS AS A WHOLE. THIS INFORMATION IS INCLUDED SOLELY FOR THE USE AND ANALYSIS OF THE DECENTRALIZED ADMINISTRATION OF LARGE TAXPAYERS AUDIT.

BASED ON MY AUDIT, I STATE THE FOLLOWING:

I. WITHIN THE SELECTIVE TESTS CARRIED OUT IN COMPLIANCE WITH THE ISA, I REVIEWED THE TAX SITUATION OF THE TAXPAYER REFERRED TO IN ARTICLE 58, SECTION V OF THE RCFF, FOR THE PERIOD COVERED BY THE AUDITED SEPARATE FINANCIAL STATEMENTS AND, WITHIN THE SCOPE OF MY SELECTIVE TESTS, I REVIEWED THAT THE GOODS AND SERVICES PURCHASED OR SOLD OR PROVIDED FOR USE OR ENJOYMENT BY THE ENTITY WERE EFFECTIVELY RECEIVED, DELIVERED, OR PROVIDED, RESPECTIVELY. IN ACCORDANCE WITH SECTION II OF RULE 2.10.15 OF THE RMF, THE PROCEDURES I APPLIED DID NOT INCLUDE EXAMINING COMPLIANCE WITH CUSTOMS AND FOREIGN TRADE REGULATIONS.

MY WORKING PAPERS CONTAIN EVIDENCE OF THE AUDIT PROCEDURES APPLIED TO SELECTED ITEMS THROUGH SAMPLING, WHICH SUPPORT THE CONCLUSIONS REACHED.

II. I VERIFIED, BASED ON SELECTIVE TESTS AND THE ISA, THE CALCULATION AND PAYMENT OF FEDERAL TAXES INCURRED DURING THE YEAR, AS INCLUDED IN THE LIST OF TAX LIABILITIES OF THE TAXPAYER AS A DIRECT TAXPAYER OR AS A WITHHOLDING AGENT. SINCE THE ENTITY HAS NO EMPLOYEES, NO EMPLOYER-EMPLOYEE CONTRIBUTIONS TO THE MEXICAN SOCIAL SECURITY INSTITUTE (IMSS) ARISING FROM WAGES AND SALARIES WERE DETERMINED.

III. I VERIFIED, BASED ON SELECTIVE TESTS AND THE ISA, THAT THE TAXPAYER WAS ENTITLED TO THE CREDIT BALANCES APPLIED IN COMPENSATIONS MADE DURING THE REVIEWED PERIOD AND THAT THE AMOUNTS PENDING REFUND OR REFUNDED TO THE ENTITY BY THE TAX AUTHORITY RESULTED FROM SUCH BALANCES.

IV. I REVIEWED, BASED ON THEIR NATURE AND APPLICATION MECHANISM USED, WHERE APPLICABLE, IN PREVIOUS YEARS, THE ITEMS AND AMOUNTS SHOWN IN THE FOLLOWING ANNEXES: RECONCILIATION BETWEEN ACCOUNTING AND TAX RESULTS FOR INCOME TAX (ISR) PURPOSES AND RECONCILIATION BETWEEN REPORTED REVENUES ACCORDING TO THE STATEMENT OF COMPREHENSIVE INCOME, TAXABLE INCOME FOR ISR PURPOSES, AND THE TOTAL SUM OF TRANSACTIONS FOR VALUE-ADDED TAX (VAT) PURPOSES FROM FINAL MONTHLY PAYMENTS MADE IN 2023.

V. I WAS NOT AWARE THAT THE TAXPAYER FILED AMENDED TAX RETURNS DURING THE YEAR THAT MODIFIED THOSE FROM PREVIOUS YEARS. LIKEWISE, I REVIEWED THE AMENDED RETURNS THAT I WAS AWARE OF, FILED BY THE TAXPAYER FOR TAX DIFFERENCES IN THE AUDITED YEAR, VERIFYING THAT THEY WERE FILED IN ACCORDANCE WITH TAX REGULATIONS.

VI. SINCE THE ENTITY HAS NO EMPLOYEES, IT DID NOT DETERMINE OR PAY EMPLOYEE PROFIT SHARING.

VII. THROUGH SELECTIVE TESTING, I REVIEWED THE BALANCES OF THE ACCOUNTS INDICATED IN THE ANNEXES RELATING TO THE COMPARATIVE ANALYSIS OF EXPENSE SUBACCOUNTS, THE COMPARATIVE ANALYSIS OF SUBACCOUNTS OF THE COMPREHENSIVE FINANCING RESULT, RECONCILING, WHERE APPLICABLE: A) THE DIFFERENCES WITH THE BASIC SEPARATE FINANCIAL STATEMENTS, ORIGINATED BY RECLASSIFICATIONS FOR PRESENTATION PURPOSES, AND B) THE DETERMINATION OF DEDUCTIBLE AND NON-DEDUCTIBLE AMOUNTS FOR INCOME TAX PURPOSES.

VIII. I HAD NO KNOWLEDGE THAT THE ENTITY OBTAINED RULINGS FROM TAX OR JURISDICTIONAL AUTHORITIES (FEDERAL COURT OF ADMINISTRATIVE JUSTICE (FORMERLY FEDERAL COURT OF TAX AND ADMINISTRATIVE JUSTICE) OR SUPREME COURT OF JUSTICE – DISTRICT COURTS AND CIRCUIT COURT), OR THAT IT BENEFITED FROM TAX INCENTIVES, EXEMPTIONS, SUBSIDIES, OR TAX CREDITS DURING THE YEAR ENDED DECEMBER 31, 2023.

IX. DURING THE YEAR, BASED ON MY AUDIT TESTS, I DID NOT OBSERVE THAT THE ENTITY WAS JOINTLY LIABLE AS A WITHHOLDER IN THE SALE OF SHARES CARRIED OUT BY FOREIGN RESIDENTS.

X. I REVIEWED THE FOREIGN EXCHANGE LOSSES ACCRUED DUE TO FOREIGN CURRENCY FLUCTUATIONS. THIS REVIEW WAS CONDUCTED ON A SELECTIVE BASIS THROUGH UNDERSTANDING, EVALUATION, AND TESTING OF INTERNAL CONTROLS, COVERING A PERCENTAGE OF THE ACCRUED FOREIGN EXCHANGE GAINS OR (AND) LOSSES THROUGH SUBSTANTIVE DETAILED TESTS ON EXCHANGE RATE FLUCTUATIONS, PROVIDING COVERAGE FOR THE ACCRUED FOREIGN EXCHANGE GAINS OR (AND) LOSSES.

XI. THE ENTITY'S BALANCES WITH ITS MAIN RELATED PARTIES AS OF DECEMBER 31, 2023, ARE DISCLOSED IN NOTE 20 TO THE SEPARATE FINANCIAL STATEMENTS, INCLUDED IN THE ANNEX "NOTES TO THE FINANCIAL STATEMENTS" OF SIPRED. TRANSACTIONS WITH RELATED PARTIES CARRIED OUT DURING THE YEAR ARE DISCLOSED IN ANNEX 16 "TRANSACTIONS WITH RELATED PARTIES" OF SIPRED. WITHIN THE SCOPE OF MY SELECTIVE TESTING, I REVIEWED COMPLIANCE WITH OBLIGATIONS RELATED TO TRANSACTIONS WITH RELATED PARTIES IN ACCORDANCE WITH THE FOLLOWING REGULATIONS: ARTICLES 11, 27, SECTION XIII, 28, SECTIONS XVII, FOURTH PARAGRAPH, SUBSECTION B), XVIII, XXVII, XXIX, 76, SECTIONS IX, X, AND XII, 179, AND 180 OF THE INCOME TAX LAW.

XII. DURING THE YEAR ENDED DECEMBER 31, 2023, IN THE GENERAL DATA ANNEX OF SIPRED, THE ENTITY INCLUDED INFORMATION RELATED TO THE APPLICATION OF SOME CRITERIA DIFFERENT FROM THOSE THAT MAY HAVE BEEN DISCLOSED BY THE TAX AUTHORITY PURSUANT TO SUBSECTION H) OF SECTION I OF ARTICLE 33 OF THE FEDERAL TAX CODE IN FORCE AS OF DECEMBER 31, 2023. THE TAXPAYER STATED IN THE MENTIONED ANNEX THAT DURING THE YEAR ENDED DECEMBER 31, 2023, IT DID NOT APPLY SUCH CRITERIA.

XIII. WITHIN THE SCOPE OF MY SELECTIVE TESTING, I REVIEWED THE INFORMATION THAT THE TAXPAYER REPORTED IN THE INFORMATIONAL RETURNS FILED IN THE FOLLOWING ANNEXES OF THE MULTIPLE INFORMATION RETURN WITHOUT OBSERVING ANY OMISSION: A) ARTICLE 76, SECTION VI OF THE INCOME TAX LAW "INFORMATION ON" (ANNEX 4 OF THE MULTIPLE INFORMATION RETURN)

3. IT IS IMPORTANT TO NOTE THAT A PUBLIC ACCOUNTANT DOES NOT HAVE THE PROFESSIONAL TRAINING OR LEGAL AUTHORITY TO DETERMINE AND/OR LEGALLY QUALIFY WHICH CONDUCTS MAY

CONSTITUTE THE COMMISSION OF A TAX OFFENSE. THEREFORE, IT WILL ALWAYS BE UP TO THE COMPETENT AUTHORITIES TO LEGALLY DETERMINE THE EXISTENCE OR NON-EXISTENCE OF THE PRESUMED CONDUCT THAT COULD CONSTITUTE A TAX OFFENSE.

OTHER MATTERS

4. MY RESPONSES TO THE QUESTIONS IN THE TAX DIAGNOSTIC AND TRANSFER PRICING QUESTIONNAIRES, WHICH ARE PART OF THE INFORMATION INCLUDED IN SIPRED, ARE BASED ON THE RESULTS OF MY AUDIT OF THE BASIC SEPARATE FINANCIAL STATEMENTS OF NEMAK, S.A.B. DE C.V. AS OF DECEMBER 31, 2023, AND FOR THE YEAR THEN ENDED, WHICH WAS CONDUCTED IN ACCORDANCE WITH INTERNATIONAL AUDITING STANDARDS (ISA). CONSEQUENTLY, THE RESPONSES INDICATING COMPLIANCE WITH TAX REGULATIONS BY THE TAXPAYER ARE SUPPORTED BY: A) THE RESULTS OF MY AUDIT CONDUCTED IN ACCORDANCE WITH ISA, OR B) THE FACT THAT DURING MY AUDIT CONDUCTED PURSUANT TO ISA, I REVIEWED AND HAD NO KNOWLEDGE OF ANY NON-COMPLIANCE BY THE TAXPAYER WITH ITS TAX OBLIGATIONS. SOME RESPONSES TO THE QUESTIONS IN THE TAX DIAGNOSTIC QUESTIONNAIRE AND THE TRANSFER PRICING QUESTIONNAIRE WERE LEFT BLANK DUE TO: 1) THEY DO NOT APPLY TO THE ENTITY, 2) THERE IS NO POSSIBLE ANSWER, OR 3) THE INFORMATION WAS NOT REVIEWED AS IT WAS NOT WITHIN THE SCOPE OF MY REVIEW, WHICH DOES NOT CONSTITUTE NON-COMPLIANCE WITH TAX REGULATIONS.

5. REGARDING THE ENTITY'S RESPONSES TO THE TAXPAYER'S TAX DIAGNOSTIC AND TRANSFER PRICING QUESTIONNAIRES INCLUDED IN THE "GENERAL DATA" AND "TAXPAYER INFORMATION ON ITS TRANSACTIONS WITH RELATED PARTIES" ANNEXES, RESPECTIVELY, WHICH FORM PART OF THE INFORMATION INCLUDED IN SIPRED, I HAVE ANALYZED AND REVIEWED THAT THESE RESPONSES ARE CONSISTENT WITH THE RESULTS OF MY AUDIT CONDUCTED IN ACCORDANCE WITH ISA. CONSEQUENTLY, THE RESPONSES INDICATING COMPLIANCE WITH TAX REGULATIONS BY THE TAXPAYER ARE SUPPORTED BY THE FACT THAT DURING THE AUDIT I CONDUCTED, I REVIEWED AND HAD NO KNOWLEDGE OF ANY NON-COMPLIANCE REGARDING THE TAX OBLIGATIONS REFERRED TO IN THESE QUESTIONNAIRES. LIKEWISE, SOME QUESTIONS REQUIRE INFORMATION THAT IS NOT PART OF THE BASIC SEPARATE FINANCIAL STATEMENTS, SO THE RESPONSES WERE PROVIDED BY THE ENTITY AND WERE NOT WITHIN THE SCOPE OF MY AUDIT.

6. AS OF DECEMBER 31, 2023, NO MATERIAL DIFFERENCES WERE IDENTIFIED IN CONTRIBUTIONS PAYABLE BY THE TAXPAYER AS A DIRECT OBLIGOR OR IN ITS CAPACITY AS A WITHHOLDER.

[signature]

C.P.C. CARLOS A. LÓPEZ VÁZQUEZ
AGAFF REGISTRATION NUMBER 18167

MONTERREY, N.L., ON MAY 14, 2024