

1. Purpose & Scope

Nemak Corporate Values declare that the company and its stakeholders must drive business growth while acting with respect and responsibility towards our people, the environment and the communities in which we operate.

Nemak's Human Rights Policy aligns with our Values, Code of Conduct, and business policies covering diversity, environment, health and safety, and employee relations.

This Policy also reflects the principles contained in the International Bill of Human Rights, International Labor Organization Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, Sustainable Development Goals (SDGs) and the UN Guiding Principles on Business and Human Rights.

As declared by the UN, Human Rights are:

- inherent, in that they belong to every person by virtue of being human;
- inalienable, in that people cannot consent to giving them up or be deprived of them by governments or any other institution;
- universal, in that they apply to everyone regardless of any status;
- indivisible, in that no human rights may be selectively ignored; and
- interdependent, in that realization of one right contributes to the realization of other rights.

The Human Rights Policy applies to all Nemak suppliers, contractors, employees and joint venture employees over which Nemak has management control.

2. General Guidelines

Respect and Responsibility

Nemak is truly committed to maintaining and promoting the fundamental human rights of employees by operating under global code of business conduct that:

- Promotes a workplace free of discrimination and harassment
- Strictly prohibits child labor, forced labor, and human trafficking
- Guarantees fair and equitable wages, benefits, and other conditions of employment in compliance with local regulations
- Provides humane and safe working conditions
- Recognizes and respect employees' rights to freedom of association and collective bargaining

Discrimination and Harassment

Nemak rejects any type of discrimination and is committed to providing our employees with equal employment opportunities regardless of age, gender, race, ethnic background, national origin, religion, disability or any other status.

Discrimination involves any distinction, exclusion or preference that has the effect of nullifying equality of treatment or opportunity, where that consideration is based on prejudice rather than a legitimate ground.

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.

Vulnerable groups

Nemak is committed to providing a safe and protected environment for its employees at all times. We comply fully with relevant legislations and guidance regarding members of vulnerable groups such as:

- Women
- Children
- Refugees
- Internally displaced persons
- Stateless persons
- National minorities
- Indigenous peoples
- Migrant workers
- Disabled persons
- Elderly persons
- HIV positive persons and AIDS victims
- Lesbian, gay and transgender people
- Other vulnerable groups may include, for example, the poor, illiterate people, and religious groups.

Child Labor

Nemak strictly prohibits the use of child labor. We do not employ any person under the age of 18 or below the legal minimum age. Younger workers may be employed through Company approved short-term internships, apprenticeships or work experience programs, but they are not allowed to do work that may threaten their health and safety, or obstruct their education.

Forced labor and human trafficking

Nemak does not use and condemns forced labor in any form. The Company prohibits the use of all forms of forced labor, including:

- indentured labor
- bonded labor
- slave labor and any form of human trafficking

Additionally, Nemak upholds zero tolerance to the use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as method of discipline or control.

Working Conditions

Nemak provides and maintains for all personnel a work environment that meets or exceeds applicable legal standards for occupational health and safety. Each employee must follow health

and safety rules and practices and must report accidents, injuries, and unsafe equipment, practices, or conditions, and near misses.

Working hours, wages and benefits

Nemak operates in compliance with all applicable laws regulating working hours, providing competitive compensation and benefits packages relative to the industry and key talent markets, that are fair and comply with applicable laws.

Freedom of association and collective bargaining

We recognize and respect freedom of association and the right to collective bargaining. In locations where employees are unable to exercise these rights due to legal constraints or other reasons, we provide channels for employee concerns to be heard.

Avoiding complicity

Nemak upholds zero tolerance to wrongful acts of others that are inconsistent with, or disrespectful of, international norms of behavior or local laws. Functional areas must assess if through association with third parties Nemak could be at risk of being an accomplice thereof and must take preventing preventive measures.

Responsibility of Implementation

People under the scope of this policy are responsible for implementing this policy and 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. Additionally, Nemak will cooperate with the relevant authorities in case the breach is subject to civil and criminal penalties.

3. Contact Information

We expect employees and suppliers to report all known or suspected violations of this policy. All our stakeholders can raise concerns or report violations without fear of reprisal through one of the following channels:

- The direct manager or next-level manager
- The Human Resources manager or director
- Nemak Governance and Compliance department (governance@nemak.com)
- ALFA's transparency helpline (<http://www.alfa.com.mx/CONT/transparency.htm>)

Nemak commits to observe international whistleblower protection standards or laws. Retaliation against a person for reporting an issue in good faith is a violation of our Global Code of Conduct.

4. Revisions

0, May - 2019

5. Approved by

CEO – May – 2019