



## Global Business Code for Suppliers

## **Preface**

Nemak seeks to advance our commitment that all aspects of our business relationships are based on Nemak's Values: Customer Focus, Trust and Collaboration, Innovation, and Respect & Responsibility (social, environmental, and economic). Nemak intends to achieve this commitment through long-term, mutually beneficial partnerships with our suppliers.

Therefore, we expect our suppliers to comply with this Global Business Code for Suppliers (the "Code") and to bind their own suppliers accordingly.

This Code is based on Nemak's Values and high standard business principles set forth in Nemak's Code of Conduct & and in the following international treaties and agreements: The Organization for Economic Cooperation and Development's (OECD) Guidelines for Multinational Enterprises, the Global Compact and the Universal Declaration of Human Rights of the United Nations (UN) and the Conventions of the International Labor Organization (ILO).

This Code reflects our commitment to a culture of integrity, honesty and accountability and outlines the basic principles that all suppliers are expected to follow when doing business with Nemak. Nemak expects its suppliers to cascade this expectation through their own supply chain.

## **Declarations**

Suppliers should be aware that Nemak's Purchasing department is the only department authorized to initiate and close business with suppliers. Official documents such as contracts and purchase orders are the only mechanisms to formalize business agreements with Nemak.

Nemak reserves the right to withhold payment if a supplier decides to deliver products or services in breach of the requisites described in the previous paragraph.

Suppliers are expected to adapt sustainable and responsible practices that promote conservation of resources and raw materials and shall not provide products containing materials that contribute to human rights abuses, bribery and violation of ethics, or negatively impact the environment

In addition, Nemak does not accept materials and alloys containing mineral in conflict such as Tungsten, Tantalum, Tin and Gold (3TG) from DRC (Democrat Republic of Congo).

English is the official language for external corporate communications with suppliers. However local language can be used for convenience in day to day operations to facilitate an appropriate and professional dialogue

## **I. Business Practices, Ethics & Compliance**

### **Compliance with laws.**

Suppliers shall obey all applicable laws and regulations and comply with the above-mentioned international treaties and agreements. Suppliers are expected to monitor business processes and policies to ensure compliance with applicable law and regulations.

### **Prohibition of corruption.**

Supplier shall not engage in corruption or bribery and shall have adequate compliance programs to ensure that its employees do not engage in such conduct. Nemak will enforce this prohibition strictly and will take appropriate corrective actions in the event of noncompliance, including the termination of business relationships, cooperation with authorities and any applicable legal action.

**Fair competition.**

Supplier shall respect the rules of fair competition and shall comply with all applicable competition and anti-trust laws.

**Prohibition of money laundering.**

Supplier shall not take part in any form of money laundering.

**Privacy & intellectual property.**

Supplier shall make appropriate use of confidential information and intellectual property rights. Supplier shall take adequate safeguards to protect the intellectual property rights of its business partners and the privacy of its employees.

**Gifts, services and favors**

Gifts, services and favors should never be offered to or received by Nemak's employees. Symbolic promotional gifts of a nominal value up to \$30 USD or less may be offered provided that they do not compromise, or appear to compromise, the employee's ability to make objective business decisions in the best interest of Nemak.

**Business relation**

Nemak provides suppliers with fair opportunities to present a bid and ensures that decisions are taken through a confidential and consensual process, based on bidding, internal evaluations and supplier assessment results.

Nemak's employees are expected not to engage in unfair, deceptive or misleading practices when interacting with suppliers.

**Business Relations with Direct Family Members**

If a direct family member\* of a Nemak employee is employed by or has investments in a supplier, this can create a conflict of interests or an apparent conflict of interests, especially if the employee has discretionary authority in dealing with suppliers as part of their job at Nemak or if their direct family member deals with Nemak on behalf of suppliers. Such situations call for extra scrutiny in order to prevent security or confidentiality breaches and to avoid conflicts of interest.

Nemak's employees are expected to excuse themselves from any business dealing with suppliers in the event a conflict of interests arises.

If a supplier becomes aware or identifies a conflict or a potential conflict of interest they should disclose this to the Purchasing team and/or via Alfa's Transparency Hotline. Nemak will ensure that appropriate actions are taken when a violation is detected.

\*Spouse, partner, parent, step-parent, child, step-child.

**II. Environment & Product Safety****Resource conservation.**

Supplier shall commit to responsible environmental practices such as waste avoidance, recycling, and energy conservation. Supplier is expected to take a precautionary approach to any environmental challenges.

**Reducing environmental impact and emissions.**

Supplier shall seek to minimize the environmental impact of its operations and to control its emissions.

**Hazardous materials and product safety.**

Supplier shall identify any hazardous materials used in its operations and ensure that they are safely handled, moved, stored, and disposed, and shall procure to recycle or reuse its materials. Supplier is expected to comply with all product safety requirements set by applicable laws and regulations.

**Environmental management systems.**

Supplier shall establish and maintain a robust environmental management system (e.g. ISO 14001 EMAS).

**Water management, waste and air quality.**

Supplier is expected to preserve water resources and reduce water consumption in all activities related to maintain its operations, as well as minimize emissions that damage air quality.

### **III. Human Rights**

**Respect for human rights.**

Supplier shall be committed to protecting internationally accepted human rights, and to enforce the following conditions at all its locations:

**Prohibition of child labor.**

Supplier shall not use child labor, or employ any person under the age of 15 or below the legal minimum age, if higher.

**Prohibition of forced labor.**

Supplier shall not use forced or compulsory labor in any form.

**Principle of non-discrimination.**

Supplier shall not engage in discriminatory practices based on age, gender, race, ethnic or social background, national origin, religion or belief, disability, gender reassignment, union activity, political affiliation or any other personal characteristic or other status protected by law.

### **IV. Working Conditions**

**Occupational health and safety.**

Supplier shall ensure that its work environment meets or exceeds applicable occupational health and safety standards.

**Freedom of association and collective bargaining.**

Supplier shall respect its employees' freedom of association and right to collective bargaining. In locations where these rights do not exist due to legal constraints, supplier should provide adequate channels for employee concerns to be heard.

**Fair wages.**

Supplier shall provide its employees with compensation and benefits that are fair and comply with applicable laws.

**Fair working hours.**

Supplier shall comply with all applicable laws regulating working hours.

### **V. Information Security and Privacy**

**Confidentiality**

Supplier shall take proactive measures in order to correctly safeguard personal data or confidential information that is disclosed to it for the purpose of the supply of products and/or services.

Supplier represents and warrants that personal data or confidential information may only be used for business purposes and in strict alignment with any agreements between the parties, as well as with any Nemak policies and the applicable law.

**Information Security Awareness.**

Supplier shall implement awareness and learning programs (across their employees) with respect to information security, taking preventive measures, and implementing policies, procedures and controls on how to classify and manage information.

**Access Controls and Password Management.**

Supplier shall define process and policies and take the necessary measures to have a controlled and secure access to data sources and systems.

Supplier shall implement password policies (e.g. validity period, strong mandatory combination of characters, etc.) in order to protect and correctly safeguard access to data from unauthorized persons.

**Cybersecurity Risks and Incidents Management.**

Supplier shall identify cybersecurity risks and take appropriate action towards preventing any security incidents.

Supplier shall have the appropriate mechanisms to promptly report severe risks or inappropriate management of personal data or confidential information.

**Business Continuity.**

Supplier shall develop business continuity plans for critical systems. These plans shall include, but not be limited to, disaster recovery procedures that are tested at least once a year.

**Malware Management.**

Supplier shall have appropriate antivirus software with firewall features in all computers in order to block any malware attempt.

**Physical Access.**

Supplier shall ensure that personal data and confidential information is only accessed by authorized personnel under the need-to-know basis.

For further details regarding Information Security Requirements for Suppliers please refer to the following [annex](#).

**VI. Implementation and Compliance**

This Code is part of the contracts entered into between Nemak and its suppliers.

Nemak reserves the right to audit and verify suppliers' compliance with these guidelines and to take appropriate action in case of violations.

Suppliers may report violations or suspected violations to this Code anonymously to [Alfa's Transparency Helpline](#) by sending an email to: [transparency@alfa.com.mx](mailto:transparency@alfa.com.mx) or by calling any of the Helpline's toll-free numbers in the countries where Nematik operates.

Nematik will not take any retaliatory actions against stakeholders who report a violation or who cooperate in the investigation of a violation reported by someone else.

If a supplier is found to have breached this Code, Nematik may develop a corrective action plan and monitor the progress of the supplier for a specified time-frame (depending on the severity of the breach). Nematik may terminate its relationship with any supplier that repeatedly and knowingly violates this Code and refuses to implement improvement plans.

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