

IOCHPE MAXION S.A. SUPPLIER CODE OF CONDUCT

Introduction

Iochepe-Maxion S.A. and its subsidiaries and joint ventures (“IOCHPE-MAXION”) is committed to operate in an ethical, upright, and transparent way in all activities and we expect that our directors, officers, employees, service providers, vendors, commercial agents, representatives, intermediaries, consultants and suppliers act the same way.

For IOCHPE-MAXION, compliance means knowing, understanding and enforcing the laws and regulations that govern our business globally, in addition to this Supplier Code of Conduct and our internal rules, which were designed in order to ensure our organization's reputation and to preserve the company's assets, as well as to guarantee a good and appropriate relationship with our employees, directors, officers, shareholders, customers, suppliers and service providers, governments and society as a whole.

This Supplier Code of Conduct acts in a reciprocal way and sets out the details of the minimum requirements for IOCHPE-MAXION’s global supplier network and the behaviors we would expect of each other. These are based on legal regulations, as well as internationally recognized standards such as the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, as well as the ILO core labor standards and the principles of the UN Global Compact.

We expect the highest standards of business ethics from suppliers and their agents in the entire supply chain. We expect suppliers to be explicit about the standards they demand of executives, employees, partners and subcontractors and to have governance and processes in place to monitor adherence to these standards.

1. Requirements for suppliers of IOCHPE-MAXION

This Supplier Code of Conduct serves as a vital framework that outlines the ethical, operational, and regulatory expectations we have for all our suppliers. At IOCHPE-MAXION, we are committed to upholding the highest standards of integrity, social responsibility, and sustainability in our supply chain. This document represents a collective commitment to a business environment that respects human rights, protects the environment, and promotes fair and ethical business practices. Presented below are the key requirements and principles in that respect, underscoring the critical role suppliers play in maintaining our shared values and sustainability goals.

The Supplier Code of Conduct is a supplementary document to the Company's Code of Conduct, and the compliance with its principles and terms remains mandatory for Suppliers. We expect our suppliers to act with fairness, integrity, honesty, and transparency, and comply with all applicable laws, statutes, and regulations. IOCHPE-MAXION emphasizes compliance with working hours regulations, the prohibition of child labor and modern slavery, fair wages and benefits, no harassment and non-discrimination, and freedom of association. Our management practices also comply with the Conflict Mineral Regulation, a regulatory standard that has been mandatory throughout the European Union since 2001. Based on the requirements of this legislation, IOCHPE-MAXION prepares a Conflict Mineral Report used in the supplier management process.

All suppliers shall, as a minimum, establish a policy on working conditions and human rights that contains, as a minimum, the following topics: prohibition of child labor; young workers; wages and benefits; working hours; prohibition of modern slavery; freedom of association and collective bargaining; non-discrimination and harassment; women's rights; diversity, equity, and inclusion; land, forest, and water rights and forced eviction.

IOCHPE-MAXION requires ethics, integrity, and transparency in the relationship with its suppliers. IOCHPE-MAXION's directors, officers and employees must act diligently when selecting, contracting, and maintaining suppliers, seeking what is in IOCHPE-MAXION's best interest, based on technical, impartial and transparent criteria, including: reputation and ethical conduct, competence, quality, level of service, technological

innovation, compliance with deadlines, competitiveness, and economic and financial situation, among others.

1.1 Environmental responsibility

IOCHPE-MAXION fulfills its social responsibilities by carrying out its activities with productivity, supplying quality products and providing excellent services, complying with all applicable laws and regulations, avoiding waste, and respecting the environment, cultural values, human rights and social organization of the communities in which it operates. In this way, it satisfies its customers, creates job opportunities, contributes to the sustainable development of the regions in which it operates and generates wealth for society.

IOCHPE-MAXION's activities are conducted in a responsible way with regard to protecting health, biodiversity and preserving the environment, seeking, whenever feasible and over time, to reduce and minimize the environmental impact caused by its operations, as well as to spread this commitment with sustainability among its directors, officers and employees, suppliers and customers as well as to the community at large.

IOCHPE-MAXION has a commitment to decarbonization, aiming to reduce CO2 emissions, covering the life cycle of its products. It also involves the increase of use of renewable energy, and it is expected that all the suppliers will engage in the same efforts to enhance decarbonization.

It is IOCHPE-MAXION goal to be a sustainable leader in the automotive sector with major advancements made in procurement and utilization of renewable energy and implementation of several solar generation projects.

We further demonstrated this urgency by joining the United Nations Global Compact and committing to the SBTi Net-Zero Standard. These public pledges also serve to bring greater visibility of sustainability across our organization so that all our employees know how they can contribute and so that our suppliers actively work on energy efficiency projects as well.

IOCHPE-MAXION manages materials and waste in accordance with European REACH legislation and other applicable regional legislation.

12 Social responsibility

IOCHPE-MAXION's suppliers must not allow child labor or any type of slave or forced labor or compulsory labor. Neither shall they support, contribute to, assist or facilitate human trafficking, nor tolerate disciplinary measures that involve physical or psychological abuse of any type.

IOCHPE-MAXION does not accept abusive or discriminatory conduct or undue benefit in the selection, admission, remuneration, evaluation or promotion processes of its directors, officers and employees. Among others, the following criteria are to be used in the aforementioned processes: technical, preparation, educational background, professional experience, performance, appropriate behavior and attitude, and the ability to work in groups.

IOCHPE-MAXION's business activities take into consideration the health and livelihood of local communities and indigenous peoples. We consider risk scenarios like air, water, or soil pollution, deforestation, improper handling of hazardous waste, or groundwater extraction in areas of water scarcity when determining our precise fields of action, also to protect the legal positions of the above groups of persons. We also strongly oppose the destruction of cultural and ritual sites and the unlawful eviction and deprivation of land, forests, and waters. It is also our declared aim to minimize the impact on the local population of construction work at our sites, as well as ongoing operations. We are committed to avoid or at least minimize adverse effects on the local population.

IOCHPE-MAXION is committed to sourcing the materials used in its products in a manner that does not support, contribute to, aid or facilitate armed conflicts or human rights violations. This includes materials that may contain tin, tungsten, tantalum, and gold, which are known as "conflict minerals". IOCHPE-MAXION makes reasonable efforts to ensure any such minerals that may be included in its products are produced in a responsible way and do not contribute to armed conflicts or human rights violations.

IOCHPE-MAXION does not tolerate unlawful conduct on the part of security personnel toward employees or third parties. Security forces engaged by us are contractually obliged to respect all internationally recognized human rights and environment-related rights and to ensure that security personnel receive adequate guidance and training, where necessary, through appropriate regulations and measures.

IOCHPE-MAXION is committed to combating counterfeiting and makes reasonable efforts to: minimize the risk of introduction of counterfeit parts into its products; detect counterfeit parts and materials; report any detected counterfeit cases of its products or of parts and materials in its supply chain; and remove any counterfeit parts from its products.

13 Compliance requirements

IOCHPE-MAXION's accounting records must be produced in accordance with the applicable laws and regulations, the generally accepted accounting principles and the IOCHPE-MAXION's internal rules.

IOCHPE-MAXION is committed to keeping accurate, complete, true and auditable accounting records, with no acts of omission or manipulation being permitted, whether by mistake or fraud. Conducts such as the forgery of documents, the filling out of reports with false information and the contracting of suppliers with over-billing, are examples of fraud and will result in the application of disciplinary measures as provided for in this Supplier Code of Conduct.

IOCHPE-MAXION's financial statements shall be drawn up in accordance with generally accepted accounting principles and their disclosure shall meet the minimum requirements established in the applicable accounting pronouncements and regulations.

Suppliers must warrant that the products, the purchase, manufacture, incorporation into IOCHPE-MAXION's goods and systems and the use, marketing, sale, modification, repair and/or reconstruction thereof (including before and after incorporation into IOCHPE-MAXION's goods and systems during manufacture, if applicable) do not and will not infringe any patent, trademark, copyright, trade secret, industrial design right or other intellectual property right of any third party in any jurisdiction.

Supplier hereby agrees to comply fully with all applicable economic sanctions and export control laws and regulations, including without limitation, whenever applicable, those regulations maintained by the U.S. Commerce Department's Bureau of Industry and Security ("BIS") and the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"). Without limiting the generality of the foregoing, each supplier shall not, (directly or indirectly) sell, provide, export, re-export, transfer, divert, loan, lease, consign, or otherwise dispose of any equipment, product, services, software, source code, technical data, or technology received from IOCHPE-MAXION under any agreement to or via any person, entity, or destination, or for any activity or end-use restricted by the laws or regulations of the United States or any other applicable jurisdiction without obtaining all required government authorizations. Supplier agrees to indemnify and hold harmless IOCHPE-MAXION for supplier's noncompliance with this provision. This provision shall survive termination or cancellation of the respective underlying agreement (e.g., a purchase order).

Firmly believing that free and open competition stimulates creativity and promotes continuous improvement, IOCHPE-MAXION is committed to fully complying with the competition laws and regulations. The aforesaid rules shall guide the actions of its directors, officers and as well as of third parties who legitimately and directly represent IOCHPE-MAXION, with all of the aforementioned parties being prohibited from practices or acts that are designed to frustrate or defraud the competitive process.

IOCHPE-MAXION does not tolerate any conduct that is related to money laundering or the financing of terrorism or the smuggling of weapons and narcotics, or its facilitation in any form or context, or any business practices that could create the impression of improper manipulation or influence. This applies irrespective of any alleged regional customs. IOCHPE-MAXION's directors, officers, employees, vendors, commercial agents, representatives, intermediaries, consultants and its suppliers shall comply with the laws and regulations that deal with this matter in the locations in which they operate and shall immediately report to the Hotline (<https://hotline.iochpe.com.br/>) if they identify any suspicious activities related to money laundering or terrorist financing and smuggling such as: atypical or irregular forms of payment or indications of financial resources of illegal origin.

Supplier and its employees, agents and/or representatives shall fully comply, and shall ensure that all of the supplier's subcontractors and suppliers comply, with the requirements of all applicable laws and regulations relating to the protection, use and transfer of personal data, including without limitation the Regulation 2016/679 of the European Parliament and of the Council (General Data Protection Regulation).

IOCHPE-MAXION does not permit professional decisions to be based on personal interests or interests that are not in alignment with those of the IOCHPE-MAXION. Therefore, any director, officer, employee, or other governance agent in a situation of possible conflict of interest should immediately express it and avoid influencing or taking part in any decision related to the situation in question. If he or she does not do so, any person who has knowledge of this situation should give notification of the alleged conflict.

Reports of suspected violations and complaints can be made directly to the complainant's manager, his or her unit's Human Resources Department, or through the Hotline, which allows the report or complaint to be made anonymously. IOCHPE-MAXION will ensure strict compliance with the rules of anonymity, confidentiality and prohibition of retaliation as this is a key factor in ensuring trust in the Hotline.

IOCHPE-MAXION prohibits and does not tolerate acts or threats of retaliation against any person who reports an activity or situation that is potentially in breach of this Supplier Code of Conduct, of IOCHPE-MAXION's internal rules or of the laws and regulations applicable to IOCHPE-MAXION, or who is collaborating in an investigation. Retaliation is a violation which can and shall be reported to the Hotline.

IOCHPE-MAXION's undertaking not to retaliate protects the whistleblower who acts responsibly and in good faith, even if his or her report or complaint proves to be unfounded. As a result of this, employees, directors, officers, suppliers and third parties may make reports of suspected violations and complaints without any fear that their current or potential relationship with IOCHPE-MAXION will be adversely affected by such reports or complaints.