



BUSINESS PARTNERS CODE OF ETHICS

AUGUST 2025



Galvaprime aspires that its conduct, and that of the people linked to it, complies with and aligns to current legislation, as well as with its principles of social responsibility, ethics, and sustainable development.

This Code sets out the company's commitment to the principles of social responsibility, business ethics, and transparency in all areas of activity, establishing a set of principles and guidelines aimed at ensuring the ethical and responsible behavior of all Galvaprime's administrators, professionals, and suppliers.

For this, Galvaprime must ensure that its mission and values are duly reflected in its approach to purchasing goods and services.

Accordingly, Galvaprime will only do business with clients, suppliers, contractors, and consultants (jointly referred to herein as "business partners") who comply with applicable laws, rules, and control regulations (jointly referred to herein as "applicable laws") and, at a minimum, with business conduct standards consistent with those established in this Supplier Code of Ethics (the "Code").

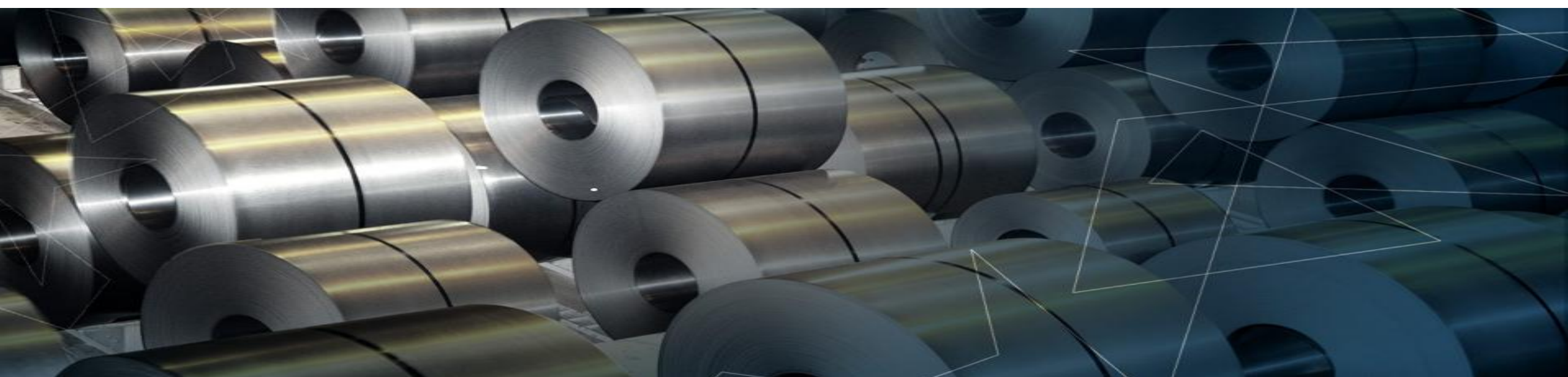
The purpose of this Supplier Code of Conduct is to disseminate and promote responsible values and behaviors in the work and professional activity of supplier companies in their different areas of operation.

The Code of Ethics formalizes the minimum ethical, social, environmental, and legal requirements that every supplier must accept and comply with in order to collaborate with Galvaprime, also assuming the commitment to extend it to their own supply chain. In the event of subcontracting by the supplier, they will be responsible for ensuring that their contractors carry out their activities in full compliance with all principles set forth in this document.

This Code applies to all Galvaprime business partners and their subcontractors.

¡Nuestro compromiso es tan fuerte, como el acero!

"Our commitment is as strong as steel!"





LEGISLATION

The business partner must comply with the applicable legislation of the country in which it operates, avoiding any conduct that, even without violating the law, may damage Galvaprime's reputation or produce adverse consequences for the company or its environment. When the business partner faces conflicting requirements, it must seek alternatives that allow it to respect internationally recognized human rights.

Avoiding any conduct that, even without violating the law, could damage Galvaprime's reputation...

HUMAN RIGHTS

Every business partner must respect the principles of the Universal Declaration of Human Rights and the conventions that develop it, as well as the recommendations of the International Labour Organization regarding workers' rights in the performance of their activities. In particular, the business partner must promote and respect, among others, the following principles:

- Respect the freedom of association and the right to collective bargaining.
- Provide safe and hygienic working conditions and comply with applicable occupational risk prevention regulations.
- Pay fair wages in accordance with legally established minimum wages.
- Avoid excessive working hours and promote work-life balance.
- Not subject employees to any type of physical or verbal abuse or any other form of intimidation.
- Prevent harsh or inhumane treatment in employment practices, child labor, or human trafficking

INCLUSION, DIVERSITY, AND HARASSMENT

We believe in and promote diversity and inclusion, and therefore we will not tolerate discrimination, harassment, or any type of workplace intimidation.

Integrate equal opportunity and non-discrimination criteria, carrying out selection, promotion, access to training, and any other personnel management practices based on professional merit and objective assessments. Do not allow any type of discrimination related to ethnic or cultural origin, sex, gender identity, sexual orientation, disability, nationality, religion, age, social origin, or ideology, among others.

Given this strong commitment, we expect business partners to have policies, procedures, and training in place to ensure that their organization and personnel comply with all applicable anti-discrimination and anti-harassment laws in the workplace and during the hiring process.

We will not tolerate the use of child labor, forced labor, or human trafficking.



HEALTH AND SAFETY

A safe workplace is a benefit and a guarantee that Galvaprime provides to its employees. We are committed to the safety and health of our staff, providing everything necessary for the safe performance of their duties, protecting them from potential occupational accidents and illnesses.

Therefore, we ask the same from our business partners. A strong commitment must be made to the health and safety of our clients, employees, communities, and other individuals affected by their operations, work, and services. Accordingly, it is expected that they take all necessary measures to provide safe working conditions that are environmentally responsible and compliant with the relevant regulations.



ENVIRONMENT

Galvaprime is strongly committed to the protection and preservation of the environment. We aim for our operations to be in harmony with nature and promote the development and implementation of prevention systems, control measures, and reduction of environmental impacts in all our operations without exception.

We therefore urge our business partners to:

- Minimize the use of substances hazardous to health and the environment.
- Reduce air pollution, energy consumption, and water consumption.
- Manage hazardous waste responsibly.
- Use materials and resources efficiently; give preference to reusable, recycled, and recyclable materials.
- Source materials from sustainable and local suppliers whenever possible.
- Reduce greenhouse gas emissions.

At Galvaprime's request, the supplier must provide data related to its CO₂ footprint (scopes 1 to 3) for the goods, manufacturing processes, and services provided.



RESPONSIBLE MINERAL SOURCING

Galvaprime is committed to ethical business conduct and responsible sourcing.

We work diligently with our supply chain partners to ensure that our products do not incorporate conflict minerals such as cobalt, mica, and silicon from entities that directly or indirectly finance conflicts or may be linked to human rights abuses, in an effort to support economic development in certain high-risk areas.



PROMOTION OF ESG (Environmental, Social y Governance) CRITERIA

Business partners shall support and promote the adoption of ESG criteria throughout the supply chain as an ethical and responsible practice that will help improve the social and environmental impact of business operations.



BRIBERY AND CORRUPTION

“While your organization works with us, you may not offer, give, or accept any type of bribe, illicit commission, gift, or benefit intended to influence a business decision or to obtain or retain certain business

This prohibition applies to cash or in-kind payments or gifts, whether made directly or through third parties.

Requests or invitations to pay a bribe may often be indirect—requests for cash or favors, subtle suggestions, or concealed arrangements within complex transactions or relationships.

Be alert to all forms of bribery requests and report any suspicious solicitation to our Ethics and Conduct Committee.

Offering luxury entertainment, travel, or hospitality; granting discounted business to one of our employees or their family members; offering employment opportunities to relatives or clients; supporting charities backed by them; or providing services or payments to government officials or their family members are examples of bribes and are strictly prohibited.

In short, neither we nor our business partners give or accept any payment, gift, hospitality, or advantage to influence a business decision, to obtain or retain business on our behalf, or in connection with our operations.





CONFLICTS OF INTEREST

"We expect our suppliers to remain alert to potential organizational or personal conflicts of interest that could affect Galvaprime's business."

Our business partners must avoid any activity that creates a conflict of interest or the appearance of one, compromising objectivity or loyalty to Galvaprime. Business partners shall not use their position to gain personal benefit at Galvaprime's expense.

To maintain full independence, business partners must identify and resolve any real or potential conflicts of interest involving their employees. In the event of a potential conflict, the supplier must follow general principles:

- Abstain from deliberations, decision-making, and access to confidential information.
- Maintain transparency and proactively disclose conflicts of interest to the Ethics and Compliance Committee through the reporting channel: etica@galvaprime.com.



Avoiding any conduct that, even without violating the law, could harm Galvaprime's reputation...



CONFIDENTIALITY

"The business partner must respect confidentiality principles regarding any information accessed as a result of its relationship with Galvaprime in the performance of its professional activity, including personal data, sensitive business information, or privileged information."

Galvaprime guarantees, at all times, the right to data protection of its employees and individuals within its stakeholder groups, ensuring proper use and protection of such information, in accordance with applicable legislation.

We require our business partners to comply with applicable data protection and privacy laws and to process data within the framework of the contractual relationship with Galvaprime.

INFORMATION SECURITY

Business partners must ensure that they implement adequate information security measures so that both digital and physical information are protected according to their confidentiality level.

Additionally, they must have an effective control model in place to verify the effectiveness of security measures, reviewing and updating this model periodically.

COMUNICACION AND TRAINING

We expect you to communicate the contents and objectives of our Supplier Code of Ethics to your staff.

We consider it good practice to implement an ethics awareness and training program that promotes ethical business decision-making and explains the benefits of such practices. Finally, we expect you to periodically assess compliance with this Code of Ethics.



NON- COMPLIANCE

Your organization and staff are obliged to report any actual or suspected violation of the Supplier Code of Ethics or any law related to the work your company performs for us.

Non-compliance by a business partner with the content of this Code may have different consequences for the contractual relationship with Galvaprime, ranging from a warning to disqualification as a supplier, without prejudice to other legal or administrative actions that may apply.

Galvaprime provides suppliers with a channel through which they can report acts that may be considered violations of this Code.

Reports or requests for guidance may be sent through our Ethics Committee's Whistleblower Channel:

- a. Phone: (81) 8112742279
- b. Email: etica@galvaprime.com
- c. Website: <https://www.galvaprime.com>
- d. Supplier 's Website
- e. Client 's Website

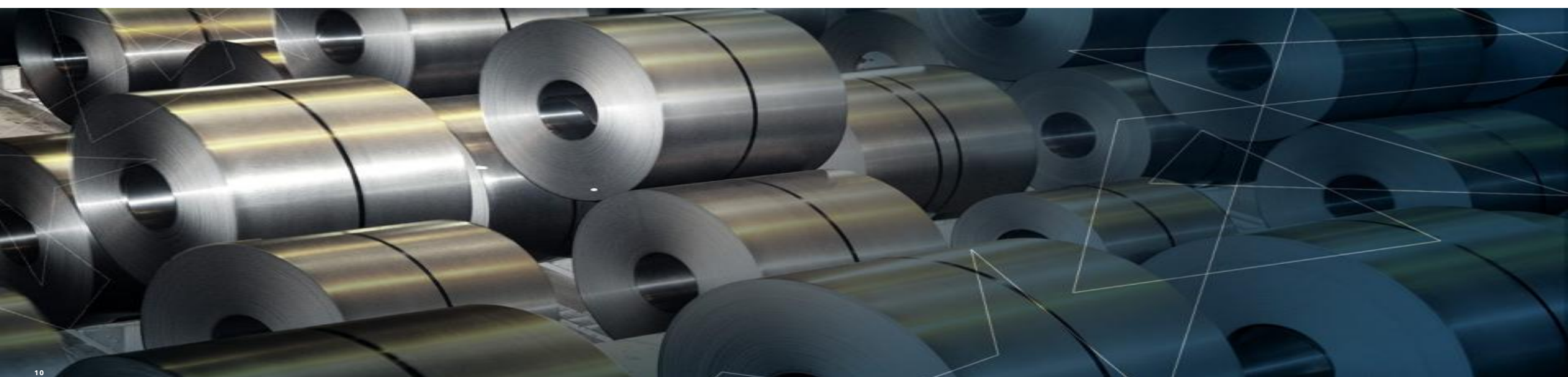
We believe that everyone, including our suppliers and their staff, should feel free to report any actual or suspected violation of this Supplier Code of Ethics, our policies, or any legal violation without fear of retaliation.

Honesty, Integrity, and Social Responsibility

APPROVAL AND REVIEW

This Code was approved by the Ethics Committee in its meeting held on August 5, 2025, and is effective immediately upon approval.

The content of this document will be updated and reviewed periodically, following the same procedure used for its creation, adapting it to changes in society in general and in Galvaprime in particular. The latest approved version will be available on Galvaprime's website.



ACKNOWLEDGMENT AND ACCEPTANCE LETTER OF THE PARTNER CODE OF ETHICS

The partner acknowledges having read and understood the terms and conditions stated in the Partner Code of Ethics and confirms its acceptance, adherence, and commitment to its compliance.

I accept the principles and conduct that I must observe.

I understand that signing this acknowledgment does not obligate Galvaprime to establish any commercial relationship with the signing company.

By signing this document, we declare our adherence to equal treatment policies for our employees regarding gender, sexual orientation, age, social status, and ethnic origin, eliminating all discrimination in our organization.

I declare that I have received and read Galvaprime S.A. de C.V.'s Code of Ethics and that I understand its content. Furthermore, I renew/express my commitment to comply with the rules and procedures contained herein.

I understand that I am obliged to report any violation of the Code as established in this document, regardless of who commits it.

Business Partner's Legal Name and Number: _____

Recipient's Name: _____

Signature: _____

Date: _____

This Code of Ethics was approved at the meeting of the Ethics Committee of Galvaprime S.A.