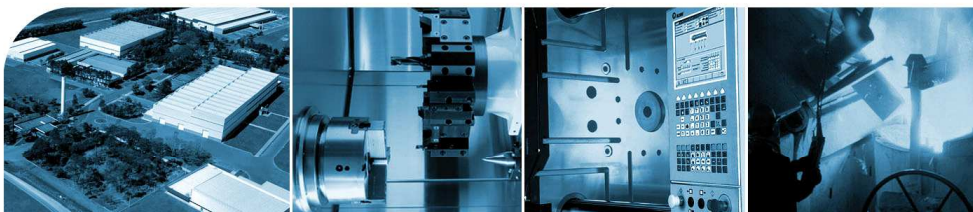




ROMI®

TRADIÇÃO EM INOVAR



Manual For Suppliers - Cast and machined

Prepared by:

Indústrias Romi S.A.

Santa Bárbara d'Oeste - SP

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GLOSSARY

CLASSIFICATION OF SUPPLIERS

GENERAL

Suppliers of items / services applied to Romi products: Manufacturers of Mechanical Items, Service Suppliers of Machining, Deburring, Painting, Surface Treatment, Foundry Supplies and others.

Suppliers that are not applied to Romi products, such as suppliers of Expedient Materials, Auxiliary Materials, Construction Material, PPE, Direct Debit, among others, are not evaluated.

AUTOMOTIVE QUALITY

Suppliers of direct items or services: Manufacturers of Items or Service Suppliers that are incorporated into the final product that is delivered to the customer, or which use influences the geometry or functionality of the product, such as Scrap, Pig Iron, Alloy Elements, Cores, Paints (final painting), Deburring, Sandblasting, Painting, Heat Treatment among others.

Suppliers of indirect items or services: Manufacturers of Items or Service Suppliers that are not incorporated into the final product that is delivered to the customer, for example, Paints for casting process (core and mold painting), Filter, Sand, Resin, Bentonite among others.

GENERAL AND AUTOMOTIVE QUALITY

Calibration service suppliers: Instrument calibration service suppliers

Transport service suppliers: Machinery and components transport service suppliers.

Note: The classification of the supplier depends on the analysis carried out by ROMI.

TERMS USED IN THE MANUAL

PRODUCT: Applies to item/service;

INDÚSTRIAS ROMI S/A: It is understood as Romi;

PPAP: Production Parts Approval Process;

IMDS: International Material Data System;

PPM: Parts per Million: Indicator that shows the degree of rejection of the products supplied, obtained by calculating the quantity of rejections divided by the total number of pieces supplied times one million;

IP: Punctuality index: Indicator that shows the percentage of punctual deliveries made by the supplier in relation to the total deliveries made;

RNC: Non-Compliance Report;

UF10: Factory Unit 10 - Foundry;

UF81: Factory Unit 81 - Machining for Third Parties;

UF82: Factory Unit 82 - Heavy Foundry.

INTRODUCTION

This Manual was developed by Romi with the purpose of guiding all of its suppliers regarding the minimum requirements, necessary for the supply of items and/or services.

As an important communication channel between Romi and its Suppliers, this Manual should be used by all companies, who wish to be or are already part of Romi's group of regular suppliers, as a guide for meeting the expected standards.

This Manual describes the supplier evaluation / reevaluation system and the methods used to monitor the performance of each supplier.

Romi's main quality goal is to ensure the permanent satisfaction of its customers and the environmental goal is to reduce environmental impacts. And for that reason, we want our suppliers to constantly seek continuous improvement to meet and exceed the expectations and requirements of this Manual.

PURPOSE

The main purpose of this Manual is to define and regulate the requirements for the supply of products to Romi.

To meet Romi's requirements, suppliers must:

- a) Implement adequate systems and controls that ensure the timely supply of products in compliance, free from defects;
- b) Manage its facilities, processes, management systems and personnel so that, consistently and at fair costs, it can manufacture products and provide services that meet the needs of Romi and its customers;
- c) Develop and implement a Quality Management System based on the standard established by Romi and documented in the topics of this manual;
- d) Meet the applicable legal requirements;
- e) Use appropriate statistical techniques for continuous process control and improvement;
- f) Continuously improve processes, reducing variation and eliminating all losses;
- g) Conduct its operations in order to ensure that all products and/or services provided to Romi comply with the laws and regulations applicable to Brazil, the jurisdictions in which the supplier does business and the country informed by Romi (corresponding to the final customer), if applicable.

CONFIDENTIALITY

Any subject dealt with suppliers must be considered confidential, i.e. under no circumstances should the subjects discussed between Romi and the Supplier be brought to the attention of third parties, without any prior authorization from Romi. The Supplier ratifies this commitment when receiving this Manual. Except in cases where Romi's Customer requests the need to enter into a specific confidentiality agreement by a supplier. Failure to comply with this requirement is subject to penalty and/or legal sanctions.

GENERAL SUPPLY CONDITIONS

In addition to meeting the requirements of this Manual, suppliers must comply with all the clauses of the General Supply Conditions, a document available on Romi's website (<http://www.romi.com/>).

1. EVALUATION OF SUPPLIERS - QUALITY

The Evaluation procedure was created to verify that suppliers are able to meet the requirements specified by Romi.

The supplier can be approved through the certification analysis (ISO 9001 / IATF 16949 / ISO 17025 / ISO 14001) and/or the company will be submitted to an evaluation process as follows:

- Audits at the company's premises made by Romi through evaluation forms, and/or request for proofs of compliance with the minimum requirements necessary to be a Romi supplier or;
- Self-evaluation, a situation where the supplier is responsible for filling out the form and sending it.

The methods mentioned above depend on the supplier's classification, as defined in the Glossary and on the criteria defined in item 1.2.

The main requirements demanded by Romi for suppliers are those described in the ISO 9001 standard, mainly:

- a) Process Control and Monitoring (Management of processes by indicators);
- b) Human and Material Resources Availability;
- c) Critical Analysis Process for supply;
- d) Supplier Control;
- e) Product Identification and Preservation;
- f) Controls and Resources focused on Product/Service Provision;
- g) Product/Service Release Process;
- h) Non-compliance and Corrective Action;
- i) Competence Management.

Romi reserves the right to freely evaluate, select and qualify its suppliers according to the forms and criteria mentioned in the following items.

The forms used will be available for consultation with suppliers, as requested.

1.1. FORMS

The forms used in the evaluation process are:

Form	Goal	Application
FAFG - Suppliers Evaluation Form (General)	Supplier Evaluation, Self-Evaluation and Self-Reevaluation	Manufacturer, Service Supplier and Distributors
FAFQA - Suppliers Evaluation Form (Automotive Quality)	Suppliers Evaluation	Manufacturer, Service Supplier and Distributors
FAPF - Supplier Process Audit Form	Suppliers Evaluation	Manufacturer, Service Supplier and Distributors
FAAF – Suppliers Evaluation Audit Form	Suppliers Evaluation	Manufacturer, Service Supplier and Distributors

FADF - Supplier Development Audit Form - ISO 9001 Requirements	Suppliers Development	Manufacturer, Service Supplier and Distributors
FADF - Supplier Development Audit Form - IATF 16949 Minimum Requirements	Suppliers Development	Manufacturer, Service Supplier and Distributors
FADF - Supplier Development Audit Form - IATF 16949 Requirements	Suppliers Development	Manufacturer, Service Supplier and Distributors
FAFST - Transport Service Supplier Evaluation Form	Self-evaluation, Evaluation and Reevaluation of Transportation Suppliers	Transportation Suppliers
FAFSC - Calibration Service Supplier Evaluation Form	Self-evaluation, Evaluation and Reevaluation of Calibration Suppliers	Calibration Suppliers

1.2. INITIAL CRITERIA FOR SUPPLIER EVALUATION

Suppliers will be evaluated according to the application of the items/services provided, taking into account the criteria and documentation defined in the following table:

Application	Critical for Quality	Evaluation Criteria	Documentation
Suppliers of items or services applied to the Romi product (General)	Yes	Supplier Evaluation, Self-Evaluation and Self-Reevaluation	FAFG + ISO 9001 or IATF 16949 Certification or FAFG (self-evaluation) or FAFG + FAAF (evaluation) + PPAP*
Suppliers of indirect items or services (Automotive Quality)	Yes	Evaluation	FAFQA + ISO 9001 or IATF 16949 Certification + PPAP or FAFQA + FAAF (partial repeal by the customer required) + ISO 14001*

Suppliers of indirect items or services (Automotive Quality)	Yes	Evaluation	FAFQA + ISO 9001 or IATF 16949 Certification or FAFQA + FAAF (partial repeal by the customer not required) + ISO 14001*
Calibration service suppliers	Yes	Self-evaluation	ISO 17025 Certification + FAFSC cover or FAFSC
Transport service suppliers	No	Self-evaluation	ISO 9001 Certification and/or FAFST + AEO or RMP Certification

* Due to the need to meet Romi's customers specific requirements, the document may be required by the UF10 / UF81 / UF82 Development Analyst, becoming mandatory for the supplier in question.

Notes:

- Audits must be carried out on the machining, heat treatment, deburring and painting suppliers classified as General, not ISO 9001 certified, and that 85% of the monthly revenue is from items or services provided to Romi;
- Direct and indirect suppliers of the Automotive Chain, whose products or services are intended for products manufactured for Romi customers, which specify mandatory ISO 14001 Certification, must have or seek certification. These suppliers will be identified by the Supplier Development Analyst. Active suppliers that participate in the supply chain and do not have such certification, will have to present an implementation plan to Romi, and partial repeal will consequently be required to the customer to continue in the supply chain until the certification is effective;
- The Supplier that is certified (ISO 9001 / IATF 16949 / ISO 17025 / ISO 14001) must send a copy of the certificate to Romi whenever it is renewed. Monitoring will be carried out through the certificate's expiration date;
- The PPAP submission level will be informed by Romi, according to the criticality of the item. When Romi does not specify how to submit PPAP, the AIAG manual should be used as a reference;
- Suppliers of Instrument and Testing Calibration Services applicable to automotive quality must have ISO 17025 certification, unless there is a partial repeal to the customer involved. The ISO 17025 certificate will be accepted, as long as the scope is proven by the sector responsible for the instrument, regarding meeting Romi's requirements;
- Road transportation suppliers of export and import goods, preferably, must have the Authorized Economic Operator (AEO) certification, otherwise, they must have the Risk Management Plan (RMP), which should include the stopping route, monitoring and scope as a priority, where the expiration of this document will be controlled. For this case, even if the transport company has the ISO 9001 certification, it is mandatory to complete the evaluation form, in the applicable questions that will be informed by Romi;
- Seal supplier used in export packaging must comply with the requirements of ISO 17712, which includes ISO 9001 certification and seal testing.

1.2.1. CALIBRATION SERVICE SUPPLIERS

Tests and Instruments Calibration Service Suppliers that are certified by ISO 17025, may be exempted from the evaluation, as long as they send a copy of the certification(s), and the scope is proven as to meet Romi's requirements.

Suppliers that are not certified by ISO 17025 will undergo the evaluation process.

Suppliers to which self-evaluation applies and who continue to provide calibration services to Romi, will be reevaluated every 3 years.

1.2.2. EXTERNAL TRANSPORTATION SERVICE SUPPLIERS

Road transportation suppliers for national goods that are certified under the ISO 9001 standard with a scope of certification compatible with Romi's interests, in addition to sending the certificate must also complete the evaluation form.

Road Transportation Suppliers of export and import goods, preferably, must have the Authorized Economic Operator (AEO) certification, otherwise, they must have the Risk Management Plan (RMP), which should include the stopping route, monitoring and scope.

For suppliers that have the relevant certification (ISO 9001 or AEO), the reevaluation will be according to the expiration of the certificate, and in the case of the Risk Management Plan - RMP it will be according to the expiration date of the document.

In cases where evaluations are applied through self-evaluation forms, the frequency of the reevaluation will be 3 years.

1.2.2.1 VIOLATION OF INTEGRITY OF THE LOADING UNIT (CONTAINER), TAMPERING OR BREAKING OF SEAL IN PACKAGES FOR THE EXTERNAL MARKET

Whenever there is a violation of the integrity of the loading unit, tampering or breaking the seals mentioned in the export documents vs. the seals found on the goods, SCOMEX must be immediately communicated and it will request photos for prior analysis of the packaging conditions.

Regardless of the condition of the packaging, a ROMI dispatcher will go to the place where the goods are located to check the loading and reseal.

In case the packaging has minor damages, the dispatcher will take the necessary material to carry out the proper closing of the packaging, at the place of shipment; otherwise, the goods must be returned to ROMI, so that the packaging process is redone.

In all cases, SCOMEX must update all documentation, considering the new seal(s).

1.2.3. SPECIFIC REQUIREMENTS

In order to comply with IATF 16949, in which Romi is certified, and service to customers in the Wind, Agricultural, Construction and Earthmoving, Oil and Gas, Railroad segments, among others, which have specific requirements, the suppliers are also required to meet these requirements.

Below are listed the minimum requirements that must be met:

- a) After the process is approved by Romi, no technical changes will be allowed without prior consent from Romi. The supplier must communicate in advance any changes to the item/process, such as: code, design, technical characteristics,

material/labor used, change or repair of tools or equipment, change of layout, change of parts sub-supplier, materials or subcontracted services (supplier must ensure that its subcontractors take the necessary measures to fulfill the obligations undertaken by the supplier), use of inactive tools, alteration of testing and measurement methods, new source of raw material. Upon notification of the change proposal, Romi defines the need (or lack thereof) for PPAP submission, as well as the level and reason for submission in each case. Only after the changes have been approved by Romi, the item can be supplied.

NOTE: If necessary, Romi must request a derogation from the customer due to changes in purchased products.

- b) Suppliers must meet statutory and regulatory requirements currently applicable to Brazil, their country and the country informed by Romi, if applicable, and must cascade all applicable requirements in the supply chain to the manufacturing site.
- c) The products of the suppliers must not contain and/or use any substances that are prohibited or in excessive quantities or subject to method restrictions, as defined by specific customer requirements and/or regulatory agency regulations, including the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) listed in the REACH candidate list, Declaration on conflict zone minerals and IMDS (if applicable).
- d) When requested, the supplier must inform the PPAP and register on the website, www.mdsystem.com the information regarding REACH, IMDS and the declaration on conflict zone minerals, as applicable.
- e) Suppliers of the Cast and Machined units must designate in their companies the person responsible for the Civil Liability for the Product and, make this communication annually to Romi or when the responsible person changes. (If applicable).
- f) Every batch delivered to the Cast and Machined units of Romi, must be accompanied by the Certificates inherent to the service performed (e.g. Certificates of Chemical, Physical, Dimensional / Visual analysis, etc.), containing information about the material, dimensional / visual and surface treatment, etc. (If applicable).
- g) The Supplier must have and provide all necessary updates to the written prescriptions regarding the assurance of the quality and reliability requirements of the products and services destined to Romi, complying with the stated, not stated and regulatory requirements. Such prescriptions must be available for verification when requested by the competent Romi departments.
- h) At any time, the supplier must be subject to receiving notifications of possible project changes and/or process improvements requested by Romi or Romi's Customers.

The Supplier Development Analyst will carry out the breakdown of other Specific Requirements of Romi's Customers and make the information available to suppliers.

Suppliers will be notified whenever there is a change in these requirements and must take the necessary actions according to the updates.

In the case of non-compliance with the specific requirement by the supplier, Romi may request a partial repeal to its final customer, however, if there is no approval of the partial repeal, the qualification or supply process may be interrupted.

1.3. FINANCIAL EVALUATION

Suppliers will be assessed through consultation with the Credit Protection Service (e.g. SERASA), and in case of financial pending issues, it will be analyzed whether it may significantly impact the supply to Indústrias Romi SA, which may cause the supplier selection process to fail.

1.4. GENERAL RESULT OF THE SUPPLIERS SELF-EVALUATION / AUDITING

The forms of Self-evaluation or Evaluation are divided into groups of Requirements, based on the standards defined by Romi. After the application of the forms with the suppliers, the result of the evaluation must be analyzed, and the relevant actions taken, as shown in the table below:

Scoring of the Requirement	Level of Compliance of the Requirement	Classification of the Requirement	Supplier Action
80 to 100%	Requirement met	Green	Submit evidence to prove the score when requested by the auditor.
50 to 79.99%	Requirement partially met	Yellow	Determine action plan or monitor supplier
0 to 49.99%	Requirement not met	Red	Define and execute an action plan, if there is interest in the continuity of development by Romi

The supplier must carry out the actions defined in the table above within a schedule to be agreed with Romi.

Some supplier evaluation forms are based on VDA 6.3, so for these cases the Classification Rules provided for in the VDA manual will be used.

All non-compliances or opportunities for improvement pointed out in supplier audits must have an action. The Action Plan and deadlines will be agreed with the Supplier Development Analyst.

Romi reserves to itself, to the purchasers of machines manufactured by Romi or to Romi's customers, the right to monitor the manufacture of items or the performance of services ordered by Romi through audits.

1.5. SUPPLIER PERFORMANCE MEASURING AND MONITORING

The indicators will be periodically calculated and used to continuously monitor the performance of each supplier. With their application, it will be possible to identify failures and points for improvement, with the purpose of constantly improving the quality of deliveries. Poor performance on these indicators may lead to disqualification of the supplier.

Any supplier that is performing poorly on deliveries may not participate in new developments and be placed on a reevaluation or disqualification level.

Suppliers that present non-conformities will be subject to bear the non-quality costs incurred for Romi. The criteria used to recover these costs are detailed in the General Supply Conditions, a document available on Romi's website (<http://www.romi.com/>).

The main indicators used to monitor the performance of suppliers are mentioned in the following items (1.5.1, 1.5.2 and 1.5.3).

For the automotive quality management system, suppliers will also be monitored through the indicators:

- Extra Shipping Index for Automotive Customers - Need for extra shipping to meet the deadline of Romi's customer, caused by the supplier's delay;
- Line Stops at Customers - Line stop at Romi's customer, due to a problem caused by the supplier;
- - Product returns made by Romi's customer, due to a problem caused by the supplier;

- Customer formal complaints / Special Situation - Formal complaints or Romi's classification as "Special Situation", due to a problem caused by the supplier.

1.5.1. QUALITY: PPM INDEX

The measurement and monitoring of quality performance will be done for suppliers applied to Romi products and processes. The calculation formula is as follows:

$$PPM = (QTY. OF NON-COMPLIANT PARTS / QTY. OF SUPPLIED PARTS) \times 1,000,000$$

1.5.2. PUNCTUALITY: PUNCTUALITY INDEX

The index will be measured by the percentage of punctual deliveries made by the supplier in relation to the total deliveries made. The tolerances allowed for anticipations and delays in deliveries are defined annually by Romi, and the criteria for comparing dates vary according to the market, as follows:

Intern market: The promised delivery date, mentioned in the Purchase Order, is compared with the actual delivery date, as evidenced by the ordinance stamp on the corresponding Invoice.

External market: The requested shipping date, mentioned in the Purchase Order, is compared with the supplier's invoice date.

$$IP = (TOTAL PUNCTUAL DELIVERIES / TOTAL DELIVERIES) \times 100$$

1.5.3. IQF: SUPPLY QUALITY INDEX (QUALITY + PUNCTUALITY)

IQF measurement and monitoring will be done for suppliers applied to Romi products and processes.

The value of the IQF is obtained by combining the INC* and IP** scores. The index will be calculated according to the following formula:

$$IQF = (0.6 \times INC) + (0.4 \times IP)$$

For the calculation of the IQF it is considered:

Index	Weight
INC	60.00%
IP	40.00%

* INC = Non-Compliance Index: % obtained by converting the PPM value according to the following table:

PPM INC scale	
1-600 PPM	100%
601-1000 PPM	95%
1001-1400 PPM	90%
1401-1800 PPM	85%
1801-2200 PPM	80%
2201-2800 PPM	75%
2801-3200 PPM	70%
3201-4000 PPM	65%
4001-5000 PPM	60%
5001-6200 PPM	55%
Above 6200 PPM	50%

** IP = Punctuality Index in Deliveries: Qty. of punctual deliveries / Total qty. of deliveries.

1.5.4. RESULTS DISCLOSURE

The criteria and frequency for the results disclosure will be defined by Romi and timely communicated to Suppliers.

1.5.5. CRITERIA FOR CORRECTIVE ACTION DUE TO NON-COMPLIANCES CAUSED BY SUPPLIERS

The Supplier Development Analyst may follow the following criteria for requesting corrective action from suppliers of direct and indirect products and services:

- Monthly PPM > 1800;
- Quality problem detected in Romi's Customers due to Supplier Non-Compliance;
- Non-Compliances detected at Romi that are impacting delays in delivery to Romi's Customers;
- Severity and/or RNC occurrence greater than 4 in the GOC;
- Others according to need.

When sending an 8D report to be completed by the supplier, the following deadlines must be observed:

- Containment Action (3D) = 24 hours
- Root Cause Analysis (4D) = 8 days (consecutive)
- Definition of Action Plan (5D) = 15 days (consecutive)

Note: After implementing the planned actions, Romi will be able to schedule audits to verify the actions "in loco" with prior notice. Evidence of the results of the actions implemented after a certain period may also be requested.

1.6. REEVALUATION OF SUPPLIERS

1.6.1. CRITERIA FOR SUPPLIERS CLASSIFIED AS GENERAL

Direct suppliers that “**do not have**” quality or punctuality problems:

Criteria	Revaluation frequency	Action to be taken
Certified Supplier ISO 9001 or IATF 16949	According to the expiration of the certificate	Keep the certificate up to date
Non-certified supplier ISO 9001 or IATF 16949	4 years (After last evaluation)	Auditing the supplier or requesting self-evaluation

Indirect suppliers that “**do not have**” quality or punctuality problems:

Criteria	Revaluation frequency	Action to be taken
Certified Supplier ISO 9001 or IATF 16949	According to the expiration of the certificate	Keep the certificate up to date
Non-certified supplier ISO 9001 or IATF 16949	5 years (After last evaluation)	Auditing the supplier or requesting self-evaluation

Direct suppliers who “have” specific quality or **punctuality** problems:

Criteria: Up to 2 months in the year with the out-of-specification IQF.

Criteria	Revaluation frequency	Action to be taken
Certified Supplier ISO 9001 or IATF 16949	3 years (After last evaluation)	Auditing the supplier or requesting self-evaluation
Non-certified supplier ISO 9001 or IATF 16949	2 years (After last evaluation)	Auditing the supplier

Indirect suppliers who “have” specific quality or **punctuality** problems:

Criteria: Up to 2 months in the year with the out-of-specification IQF.

Criteria	Revaluation frequency	Action to be taken
Certified Supplier ISO 9001 or IATF 16949	4 years (After last evaluation)	Auditing the supplier or requesting self-evaluation
Non-certified supplier ISO 9001 or IATF 16949	3 years (After last evaluation)	Auditing the supplier

Direct suppliers who “have” **systemic** quality or punctuality problems:

Criteria: 3 months or more in the year with the out-of-specification IQF.

Criteria	Revaluation frequency	Action to be taken
Certified Supplier ISO 9001 or IATF 16949	1 year (After last evaluation)	Auditing the supplier
Non-certified supplier ISO 9001 or IATF 16949	6 months (After last evaluation)	Auditing the supplier

Indirect suppliers who “have” **systemic** quality or punctuality problems:

Criteria: 3 months or more in the year with the out-of-specification IQF.

Criteria	Revaluation frequency	Action to be taken
Certified Supplier ISO 9001 or IATF 16949	2 years (After last evaluation)	Auditing the supplier
Non-certified supplier ISO 9001 or IATF 16949	1 year (After last evaluation)	Auditing the supplier

1.6.2. SUPPLIERS CLASSIFIED AS AUTOMOTIVE QUALITY

For suppliers classified as “Automotive Quality”, in addition to the need to send the updated certification according to the expiration date, the reevaluation will be made according to the following criteria:

Direct suppliers that “**do not have**” quality or punctuality problems:

Criteria	Revaluation frequency	Form to be used
Certified Supplier ISO 9001 or IATF 16949	4 years (After last evaluation)	FAPF - Supplier Process Audit Form
Non-certified supplier ISO 9001 or IATF 16949	2 years (After last evaluation)	FADF - Supplier Development Audit Form - ISO 9001 Requirements

Indirect suppliers that “**do not have**” quality or punctuality problems:

Criteria	Revaluation frequency	Form to be used
Certified Supplier ISO 9001 or IATF 16949	5 years (After last evaluation)	FAPF - Supplier Process Audit Form
Non-certified supplier ISO 9001 or IATF 16949	3 years (After last evaluation)	FADF - Supplier Development Audit Form - ISO 9001 Requirements

Direct suppliers who “have” specific quality or **punctuality** problems:

Criteria: Up to 2 months in the year with the out-of-specification IQF.

Criteria	Revaluation frequency	Form to be used
Certified Supplier ISO 9001 or IATF 16949	2 years (After last evaluation)	FAPF - Supplier Process Audit Form
Non-certified supplier ISO 9001 or IATF 16949	1 year (After last evaluation)	FADF - Supplier Development Audit Form - ISO 9001 Requirements

Indirect suppliers who “have” specific quality or **punctuality** problems:

Criteria: Up to 2 months in the year with the out-of-specification IQF

Criteria	Revaluation frequency	Form to be used
Certified Supplier ISO 9001 or IATF 16949	3 years (After last evaluation)	FAPF - Supplier Process Audit Form
Non-certified supplier ISO 9001 or IATF 16949	2 years (After last evaluation)	FADF - Supplier Development Audit Form - ISO 9001 Requirements

Direct suppliers who “have” **systemic** quality or punctuality problems:

Criteria: 3 months or more in the year with the out-of-specification IQF.

Criteria	Revaluation frequency	Form to be used
Certified Supplier ISO 9001 or IATF 16949	1 year (After last evaluation)	FAPF - Supplier Process Audit Form
Non-certified supplier ISO 9001 or IATF 16949	6 months (After last evaluation)	FADF - Supplier Development Audit Form - ISO 9001 Requirements

Indirect suppliers who “have” **systemic** quality or punctuality problems:

Criteria: 3 months or more in the year with the out-of-specification IQF

Criteria	Revaluation frequency	Form to be used
Certified Supplier ISO 9001 or IATF 16949	2 years (After last evaluation)	FAPF - Supplier Process Audit Form

Non-certified supplier ISO 9001 or IATF 16949	1 year (After last evaluation)	FADF - Supplier Development Audit Form - ISO 9001 Requirements
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Notes: VDA 6.3 forms can be used to audit the process, if it is a specific requirement from Romi's customers.

When it is not possible to carry out the audit on the supplier's site, Romi will carry out an off-site audit. In this case, the supplier must send all the evidence requested by Romi, which will be critically evaluated and the dealings must be followed according to Item 1.6.3.

1.6.3. ACTION PLAN SETTLEMENTS

An action plan will be opened to settle the requirements that score less than 10 in the audit performed or according to the VDA 6.3 classification criteria (when applicable).

The term of the action plan will be defined by the auditor together with the supplier, according to the action to be carried out.

Upon exceeding 30 days of the agreed term, the supplier will be blocked from making further purchases.

The effectiveness of the actions implemented will be evidenced through the performance of the supplier. When presenting an unsatisfactory performance, a new supply option will be analyzed.

1.7. DEVELOPMENT OF THE SUPPLIER'S QUALITY MANAGEMENT SYSTEM

The development of the supplier's quality management system is applicable only to Automotive Quality suppliers of direct items or services, and will be done according to the criteria defined in the following table:

Supplier level	Criteria	Form to be used	Deadline for auditing
Does not have ISO 9001 Certification	Presented IQF within the goal during the year under review	FADF - Supplier Development Audit Form - ISO 9001 Requirements	2 years
Does not have ISO 9001 Certification	Presented IQF below the goal for up to 2 months in the year under review	FADF - Supplier Development Audit Form - ISO 9001 Requirements	1 year

Have ISO 9001 Certification	Did not present IQF below the goal for 3 consecutive months in the year under review	FADF - Supplier Development Audit Form - IATF 16949 Minimum Requirements	5 years
Have ISO 9001 Certification	Presented IQF below the goal for 3 consecutive months in the year under review	FADF - Supplier Development Audit Form - IATF 16949 Minimum Requirements	1 year
Meets IATF 16949 minimum requirements	Did not present IQF below the goal for 3 consecutive months in the year under review	FADF - Supplier Development Audit Form - IATF 16949 Requirements	5 years
Meets IATF 16949 minimum requirements	Presented IQF below the goal for 3 consecutive months in the year under review	FADF - Supplier Development Audit Form - IATF 16949 Requirements	1 year

Suppliers will be notified of the development audit date in advance, and the requirements to be audited will be sent to them.

An action plan will be opened to deal with the required actions. The time for completion of the actions should not exceed 1 year from the date of the audit.

The requirement for ISO 9001 or IATF 16949 certification through third party audits, will depend on the customer's partial repeat period, when specified, or it will be a maximum of 1 year after the implementation of the actions.

2. SUPPLIERS EVALUATION - ENVIRONMENT

2.1. REQUIREMENTS FOR ENVIRONMENTAL SUPPLIERS

Considering the current Environmental Legislation, which determinations are subject to its activity, proof of regularity before the government and other control and inspection bodies is essential, as well as full compliance with the current federal, state and municipal legislation. Therefore, in addition to other documents that can be requested later, the documents listed below must always be in force and updated.

- Federal Technical Registration, from IBAMA;
- Operating License, issued by the state environmental control agency; and
- Fire Department Inspection Report.

Below is a list of the main requirements of the federal environmental legislation, so that suppliers identify those that are applicable to the activities of their company and provide compliance regularization.

MAIN ENVIRONMENTAL LEGISLATION REQUIREMENTS					
Item	Requirement	Source	No. Year	Subject	Application

01	Law	Legislation	12,651 2012	Institutes the Forest Code.	Suppliers, transporters and consumers of forest products and by-products.
	Amended by the Provisional Measure	Legislation	571 2012		
02	Law	Legislation	6,938 1981	Institutes the National Environment Policy; determines the appropriate use of environmental resources and environmental licensing.	General.
	Amended by Law	Legislation	12,651 2012		
03	Law	Legislation	9,433 1997	Institutes the National Water Resources Policy. Institutes charging for water use. Subject to the capture of public waters to the granting of the competent body.	General. Also applicable to companies that collect groundwater or surface water bodies, or discharge effluents into water bodies, derivations, capture for irrigation, etc.
	Amended by Law	Legislation	12,334 2010		

4	Law	Legislation	12,305 2010	It institutes the National Solid Waste Policy, determines the shared responsibility regarding the product's life cycle, the elaboration of the Waste Management Plan and Reverse Logistics, among other obligations. Regulated by: Decree No. 7,404, of December 23, 2010.	General.
05	Law	Legislation	9,605 1998	Environmental Crimes Law. Provides for penalties and administrative sanctions derived from conducts and activities harmful to the environment. Regulated by: Decree No. 3,179, of September 21, 1999, regarding administrative sanctions.	General.
06	Decree	Presidency	96,044 1988	Regulates the transport of dangerous goods by road. It determines obligations to the contractor, the dispatcher, the transporter and the	Suppliers and/or transporters of dangerous products, i.e. explosives, gases, flammable liquids, substances subject to spontaneous

				recipient. Regulated by: ANP Resolution No. 420, of Thursday, February 12, 2004.	combustion, substances that, in contact with water, emit flammable gases, oxidizing substances and organic peroxides, toxic substances and infectious substances, radioactive materials, corrosive substances, miscellaneous dangerous substances and items.
07	Decree	Presidency	99,274 1990	Regulates Law No. 6,938/81, which provides for the National Environmental Policy. It prohibits pollution and requires environmental licensing.	General.
8	Decree	Presidency	99,280 1990	It promulgates the Vienna Convention on the protection of the ozone layer and the Montreal Protocol on substances that deplete the ozone layer.	Companies that use CFCs (freons, Halons, etc.) and other substances that are harmful to the ozone layer, in their processes and in household appliances, including air conditioning.
09	Ordinance	MINTER	53 1979	Provides for the destination and treatment of waste. Prohibits the final disposal of waste on the ground.	General.
10	Ordinance	MINTER	100 1980	Establishes a standard for the emission of black smoke from vehicles powered by diesel.	Companies that own diesel vehicles.
11	Resolution:	ANP	05 2008	Establishes the safety conditions of the storage facilities for transportable LPG containers.	Companies using transportable LPG containers.
	Amended by Resolution	ANP	54 2011		
12	Resolution:	ANP	15 2005	Establishes the necessary requirements for authorization to exercise the activity of distribution of liquefied petroleum gas (LPG) and its regulation.	Companies that use and distribute LPG.
	Amended by Resolution	ANP	39 2011		
13	Ordinance	IBAMA	85 1996	It determines for companies that have their own load and passenger transport fleet with diesel vehicles to create and adopt the Internal Fleet Self-	Companies that have their own load and passenger transport fleet with diesel vehicles.

				Inspection and Correct Maintenance Program.	
14	Resolution:	CONAMA	237 1997	Provides for environmental licensing.	General.
15	Resolution:	ANTT	420 2004	Approves additional instructions to the Road and Rail Transport Regulations for Dangerous Products.	Suppliers and/or transporters of dangerous products, i.e. explosives, gases, flammable liquids, substances subject to spontaneous combustion, substances that, in contact with water, emit flammable gases, oxidizing substances and organic peroxides, toxic substances and infectious substances, radioactive materials, corrosive substances, miscellaneous dangerous substances and items.
	Amended by Resolution	ANTT	3,763 2012		
16	Law	Federal	10,357 2011	It establishes standards for control and inspection over chemical products that can be used, directly or indirectly, for the illicit elaboration of narcotic, psychotropic substances or that determine physical or psychic dependence, and other measures.	Companies that operate with products controlled by the Federal Police.
17	Ordinance	MJ	1,274 2003	Provides for chemicals controlled by the Federal Police. It submits to control and inspection, by the federal police department, under the terms of this ordinance, the chemical products listed in lists I, II, III and IV and in their respective addenda, contained in annex I	Companies that operate with products controlled by the Federal Police.
	Amended by Ordinance	MJ	113 2004		

18	Resolution:	CONAMA	313 2002	Provides for the National Inventory of Industrial Waste.	Companies which processes generate any type of industrial waste, which types are listed in art. 4 or that have been included in the list by the state environmental agency.
19	Resolution:	CONAMA	01 1990	Establishes standards regarding noise pollution and noise emission.	General.
20	Resolution:	CONAMA	08 1990	Establishes the maximum emission limits for pollutants for external combustion processes in new fixed sources.	Companies which processes have boilers, incinerators and various ovens that generate any type of atmospheric emission - smoke, vapors, gases, etc.
21	Resolution:	CONAMA	382 2006	Establishes the maximum emission limits for air pollutants for fixed sources.	Companies which processes have boilers, incinerators and various ovens that generate any type of atmospheric emission - smoke, vapors, gases, etc.
22	Resolution:	CONAMA	267 2000	Provides for the prohibition of the use of substances that deplete the Ozone Layer.	Companies that use CFCs (freons, Halons, etc.) and other substances that are harmful to the ozone layer, in their processes and in household appliances, including air conditioning.
	Amended by Resolution	CONAMA	340 2003		
23	Resolution:	CONAMA	357 2005	It provides for the classification of bodies of water and environmental guidelines for their classification, as well as establishing the conditions and standards for the discharge of liquid effluents into bodies of water, and other measures.	Companies that discharge liquid effluents into bodies of water, or that have a septic tank.
	Amended by Resolution	CONAMA	430 2011		

24	Resolution:	CONAMA	358 2005	Provides for the treatment and final disposal of waste from health services.	Hospitals, clinics, medical service points, outpatient clinics, clinical and microbiological laboratories and companies that have any of these services.
25	Resolution:	CONAMA	362 2005	Provides for use, combustion, incineration, formula and constitution, treatment, disposal, recycling, refining, industrialization, transportation, commercialization of lubricating oils.	Load / passenger transporters, companies that have a vehicle fleet, companies that have machines / equipment / engines that use lubricating oil and that generate this waste in their maintenance activities, users, manufacturers, recyclers, refiners and suppliers of lubricating oil.
26	Resolution:	ANVISA	306 2004	Provides for the Technical Regulation for the management of waste from health services.	Hospitals, clinics, medical service points, outpatient clinics, clinical and microbiological laboratories and companies that have any of these services.
27	Normative Instruction	IBAMA	06 2014	Institutes individuals and companies that are required to register in the Federal Technical Registry of Potentially Polluting Activities or Users of Natural Resources.	All private and legal persons described in Annexes I and II of the standard.

Finally, we emphasize the need to know and comply with all federal Environmental Legislation, as well as that of your state and municipality, in order to ensure full compliance with applicable legal requirements.

2.2. SUPPLIER ENVIRONMENTAL EVALUATION AND QUALIFICATION

Suppliers classified as critical are evaluated according to the following table:

SUPPLIER	TYPE OF EVALUATION/DOCUMENTS
Supplier of outsourced machined items	<ul style="list-style-type: none"> • Environmental Audit (optional); • ISO 14001 certification (optional, except for Romi customers products that specify that it is mandatory); • Operating license; • Fire Department Inspection Record.

Laboratory Analysis Service Supplier	<ul style="list-style-type: none"> • Business license; • Fire Department Inspection Report; • ISO 14001 Certification (optional); • ISO/IEC 17025: 2005 Certification (referring to the parameters to be analyzed); • Chemical responsibility certificate.
Pest Control Service Supplier	<ul style="list-style-type: none"> • ISO 14001 Certification (optional); • Fire Department Inspection Report; • Health surveillance operating license; • Term of technical responsibility.
Painting Service Supplier	<ul style="list-style-type: none"> • Environmental Audit (optional); • ISO 14001 Certification (optional); • Operating license; • Fire Department Inspection Record.
Industrial Hooks/Towel Cleaning Service Supplier	<ul style="list-style-type: none"> • Operating license; • Fire Department Inspection Report; • ISO 14001 Certification (optional).
Fire Extinguisher Maintenance Service Supplier	<ul style="list-style-type: none"> • Fire Department Inspection Report; • Certified by INMETRO; • ISO 14001 Certification (optional); • Term with the procedures regarding the collection, storage and disposal of chemical powders extinguishers.
Deburring / Painting Service Supplier	<ul style="list-style-type: none"> • Environmental Audit (optional) • ISO 14001 certification (optional, except for Romi customers products that specify that it is mandatory); • Operating license; • Fire Department Inspection Record.
Cooling Service Supplier	<ul style="list-style-type: none"> • Term with the procedures related to the collection, storage and disposal of gases controlled by the Montreal Protocol.
Waste/Effluent Disposal Service Supplier	<ul style="list-style-type: none"> • Environmental Audit (optional); • ISO 14001 Certification (optional) • Operating license; • CTF IBAMA; • Fire Department Inspection Record. <p>Note: In case of transport under the responsibility of the contracted company, also request documents from the category of the hazardous product/waste external transportation supplier.</p>
Heat/Surface Treatment Service Supplier	<ul style="list-style-type: none"> • Environmental Audit or ISO 14001 Certification; • Operating license; • Fire Department Inspection Record.
Inland transportation supplier	<ul style="list-style-type: none"> • ISO 14001 Certification (optional) • MOPP Portfolio - Handling and Operation of Dangerous Products, by truck drivers; • Forklift Operator Certificate, for forklift trucks; • PAE - Emergency Response Plan; • Environmental Insurance (optional).
Hazardous product/waste external transportation supplier	<ul style="list-style-type: none"> • ISO 14001 Certification (optional); • Fire Department Inspection Report; • Emergency service plan; • Environmental Insurance (optional).
Chemicals Manufacturer	<ul style="list-style-type: none"> • Operating license; • Fire Department Inspection Report; • ISO 14001 certification (optional, except for Romi

	customers products that specify that it is mandatory). Note: In case of transport under the responsibility of the contracted company, also request documents from the category of the hazardous product/waste external transportation supplier.
Resin Manufacturer (Casting)	<ul style="list-style-type: none"> • Operating license; • ISO 14001 certification (optional, except for Romi customers products that specify that it is mandatory); • Fire Department Inspection Report; Note: In case of transportation under the responsibility of the contracted company, also request documents from the category of the hazardous product/waste external transportation supplier;
Wood Packaging Suppliers	<ul style="list-style-type: none"> • Operating license; • CTF IBAMA; • Fire Department Inspection Report; • ISO 14001 Certification (optional); • Wood Origin Certificate; • Accreditation Certificate at the Ministry of Agriculture, Livestock and Supply - MAPA (if applicable); • Technical Responsibility Term (when applicable).
Environmental Consulting	<ul style="list-style-type: none"> • CTF IBAMA; • Fire Department Inspection Report (optional); • Registration with the Bar Association (if applicable).
Gas Manufacturer	<ul style="list-style-type: none"> • Operating license; • CTF IBAMA; • Fire Department Inspection Report; • ISO 14001 Certification (optional). Note: In case of transport under the responsibility of the contracted company, also request documents from the category of the hazardous product/waste external transportation supplier.

Notes:

- Non-critical continuous internal service suppliers are included in Romi's environmental management system, following internal rules and procedures.
- Every transporter will be inspected at the time of waste destination;
- Environmental auditing of machining, heat treatment, painting and deburring suppliers will be carried out only in cases of exclusivity, i.e. 85% or more of their production dedicated to Romi. For suppliers of waste disposal, it will be carried out when it is hazardous waste.

2.2.1. ENVIRONMENTAL QUALIFICATION OF CRITICAL SUPPLIERS EVALUATED BY THE SUBMISSION OF DOCUMENTS AND ENVIRONMENTAL AUDITING

Critical suppliers evaluated in accordance with the table in item 2.2, are environmentally qualified based on the documentation submitted or the audit carried out, meeting one of the following established criteria:

Classification	Description	Provision	Action
Green	Verification of all documents according to the table of requirement 2.2 (Score 180)	Purchase	The company is able to be a Romi supplier, and the purchase of an item and/or service may be made.
Yellow	Partial verification of the documents according to the table of requirement 2.2 (Score 150) Note: Prior License, Installation License or Operation License with renewal request within the legal term (120 days before expiration) the supplier will be controlled in this category until the document is issued.	Purchase	The action plan will be monitored by Romi, and in the meantime, the purchase of an item and/or service may be made.
Red	Failure to verify the documents according to the table of requirement 2.2. or the lack of Environmental Licensing (Score 0)	No purchase	The purchase of an item and/or service cannot be made, only in exceptional cases with the approval of the heads or manager of the responsible area

3. SUPPLIER ASSESSMENT - COMPLIANCE

The Compliance Program (“Program”) of Industrias Romi S.A. and its subsidiaries (“Company” or “ROMI”) establishes guidelines for the prevention, detection, and correction of inadequate practices or practices that violate Laws, Standards, and external and internal Regulations, encouraging the reporting of irregularities, as well as guiding and demanding ethical and responsible conduct from its members, gaining relevance as an instrument of corporate governance.

3.1. CODE OF ETHICS AND BUSINESS CONDUCT - SUPPLIERS

The Company seeks the highest standards of integrity, transparency and trust in all its businesses and relationships and is guided by a set of ethical and moral values..

The Romi Code of Ethics and Business Conduct can be accessed through the link: <https://www.romi.com/en/en-investidores/corporate-governance/compliance-program/code-of-ethics-and-conduct/>, we seek a relationship with our suppliers based on technical and transparent criteria, conducted in an ethical and respectful manner. The Code of Ethics and Business Conduct includes all the items below:

1. Applicability
2. Principles and values
3. Conduct Guidelines:
 - 3.1. Discriminatory actions
 - 3.2. Use of alcohol, drugs, and weapons
 - 3.3. Relationship with business partners
 - 3.4. Receiving/offering gifts
 - 3.5. Fraud, bribery, and corruption
 - 3.6. Relationship with public authorities and government agencies
 - 3.7. Relationship with Shareholders and Investors
 - 3.8. Relationship with the press

- 3.9. Social responsibility
- 3.10. Environment
- 3.11. Health and safety
- 3.12. Freedom of association
- 3.13. Use of assets
- 3.14. Use of information/confidentiality
- 3.15. Parallel activities
- 3.16. Activities not in the company's interests and business
- 3.17. Relatives/affective relationship
- 3.18. Potentially conflicting situations
- 4. Reporting channel
- 5. Management of the Code of Ethics and Business Conduct
- 6. Advisory bodies
- 7. Miscellaneous
- 8. Words of the CEO
- 9. Conflict of interest statement/Acceptance statement

3.1.1. RELATIONSHIP WITH BUSSINESS PARTNERS

3.1.1.1. All relationships with Romi's business partners, such as Clients, Suppliers, and Service Providers, must be based on technical and transparent criteria, conducted in an ethical and respectful manner, promoting a lasting and trusting relationship, acting in accordance with corporate purposes.

3.1.1.2. Employees who have a family relationship or personal interest with any of Romi's business partners cannot participate in any decision-making process of the Company or use the prerogatives of their position or power of influence when conducting matters related to that partner.

3.1.1.3. The use of Romi's name to buy goods, contract services, obtain loans, privately or for third parties, benefiting from credit or special discounts granted to the Company, will be considered as conflicting with Romi's interests.

3.1.1.4. The receipt of benefits, such as payments, gifts, loans, entertainment, travel, employment for relatives and favors of any nature, from individuals or legal entities that are current or potential business partners of the Company will be considered as conflicting with Romi's interests.

3.1.1.5. Employees acting on behalf of Romi ("Internal Employees"), who have any type of relationship, including kinship, with people commercially linked to Romi, whether Suppliers, Investors, or Partners, must communicate to the Company, through Internal Audit, and declare such a relationship, provided that these internal Employees have a power of influence as a result of their activities at the Company.

3.1.2. RECEIVING/OFFRING GIFTS

3.1.2.1. The practice of exchanging gifts and services must be conducted with caution and transparency so that it does not influence or appears to influence business decisions.

3.1.2.2. The receipt or offer of non-monetary gifts, with a market value equivalent to up to twenty percent (20%) of the current federal minimum wage, for each calendar year, shall not be considered a conflict of interest.

3.1.2.3. Gift or services that exceed this amount must be returned or, if impossible, forwarded to the Human Resources Manager, who will decide on their final destination.

3.1.3. FRAUD,BRIBERY, AND CORRUPTION

Romi has an Anti-Corruption and Bribery Policy available on its website.

Employees must base their relationship with the Private Organization and their respective employees on strict compliance with the legislation, rules and procedures applicable, the Code of Ethics, refraining from practicing the acts of corruption listed in the Anti-Corruption Law, in a non-exhaustive manner, such as:

- (i) Promise, offer, or give, directly or indirectly, undue advantage to a Private Organization or a third party related to it.
- (ii) Concur to practice illegal acts against the Private Organization for self-benefit;
- (iii) Use an individual or legal entity interposed to conceal or disguise the real interests or the identity of the beneficiaries of these acts;
- (iv) Obtain undue advantage or manipulating the economic-financial balance of contracts, through fraud, in contracts and/or related contracts entered into with Private Organizations;

3.2. ETHICAL REPORTING CHANNEL OF ROMI

Romi's Employees who become aware of any situations, acts, facts or practices that violate the provisions of this Code, in the policies, legislation or regulations applicable to the Company, must communicate them through the Company's Reporting Channel, available on Romi's website: www.romi.com, "Fale Conosco" (Contact Us) link.

Romi's Reporting Channel enables transparent and anonymous communication and ensures impartial and confidential treatment. The reports made on the channel will be analyzed by the Internal Audit and the Executive Ethics Committee, which will treat each case appropriately, guaranteeing the confidentiality and preserving the reporter's identity, with no retaliation of any kind being allowed.

3.3. SUPPLIER ASSESSMENT REQUIREMENTS IN COMPLIANCE

1. Does the company know about the Romi Compliance program and the Code of Ethics and Business Conduct? <https://www.romi.com/en/en-investidores/corporate-governance/compliance-program/>;

<https://www.romi.com/en/en-investidores/corporate-governance/compliance-program/code-of-ethics-and-conduct/>;

2. Does the company know the Romi communication channels, if it has any ethical complaints to make? <https://www.romi.com/en/contact-us/>-

3. Does the company have or have been involved in any corruption, money laundering or fraud process?

If so, please provide related information, which will be analyzed by Romi's Compliance area.

4-Does the company have a code of ethics and a frequency to train its employees?