

Acerinox, S.A. and its Group of companies Responsible purchasing Policy

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ACERINOX, S.A. AND ITS GROUP OF COMPANIES RESPONSIBLE PURCHASING POLICY

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ACERINOX, S.A. AND ITS GROUP OF COMPANIES RESPONSIBLE PURCHASING POLICY

<u>1. - Introduction</u>

The purpose of this General Responsible Purchasing Policy is to provide Acerinox Group employees, mainly those involved in the process of contracting purchases of goods and services, with a general framework of action that makes it possible to ensure that the selection and contracting of suppliers and contractors complies with the internal regulations in place at all times and, especially, with the values of the corporate culture and the Code of Conduct and Good Practices of Acerinox, S.A. and its corporate Group.

As part of the responsible management pursued, this Policy includes general principles for the purchase of goods and services, which encompass economic, competitive, social and environmental aspects that affect the Acerinox Group's supply chain.

2. - Sphere of application

This General Responsible Purchasing Policy applies to all purchases of products and services made by any of the entities that make up the Acerinox Group and binds all the Group's governance bodies and their companies, managers and workers, and also extends to all their suppliers and contractors.

Also, it is expected that said suppliers and contractors that supply goods or provide services to the Acerinox Group companies will convey the content of this Policy to their own supply chains.

3.- Objectives

The Acerinox Group's objective is to consolidate stable and lasting relationships with its suppliers based on shared ethical criteria that make it possible to create value in a sustainable manner, and to this end:

- a) It will regularly include social and environmental criteria in purchasing decisions.
- b) It will promote the development and sustainable long-term growth of all entities involved in the supply chain.
- c) It will promote sustainability principles among the suppliers and contractors of the Acerinox Group.
- d) It will ensure that the selection of suppliers complies at all times with the fulfilment of the commitments acquired and the internal rules of the Group that regulate contracting.

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4.- Basic principles of action

To achieve the objectives and commitments set out above, the Acerinox Group assumes and promotes the following basic principles:

- a) It will comply with the laws, regulations and any other current legislation, the Code of Conduct and Good Practices of Acerinox, S.A. and its corporate Group, and the rest of the internal rules of the Acerinox Group.
- b) It will carry out a preliminary analysis of the Group's purchasing, distribution and contracting practices, and will integrate these ethical, social, environmental, gender equality, impartiality and health and safety criteria therein, in line with the sustainability objectives and the body of policies and rules of the Acerinox Group.
- c) It will ensure that the selection of supplies, raw materials, products and services by the entities of the Group can contribute to sustainable development along the entire value chain and, to this end, it will place particular value on those suppliers or contractors that demonstrate:
 - A guarantee of a more responsible management of their operations, taking into consideration the life cycle of the product or service they offer.
 - A commitment within their organisation to raising the levels of information, training, health and well-being of workers through the assessment of occupational hazards.
 - Specific actions in the field of corporate responsibility and an ethical framework that ensures transparency in their operations.
 - The adoption of, and respect for, occupational health and safety, human rights, environmental, ethical and social standards.
 - The adoption of environmental policies that ensure an optimisation of the natural resources used and the minimisation of environmental impacts.
- d) It will apply mechanisms that promote transparency in the management of purchases and will promote equal opportunities for suppliers and contractors that participate in a specific purchasing process, basing the selection of suppliers and contractors, the award of purchases and decision-making on objective and equitable criteria.
- e) It will encourage, to the extent possible, transactions with local suppliers and contractors, provided that the local supply is sufficient and thus competitiveness is not impaired, to promote the development of the business sector and the creation of employment within the communities in which the Acerinox Group operates.

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- f) Through ongoing dialogue with suppliers and contractors, it will promote their heightened awareness of sustainability principles and issues.
- g) It will work alongside suppliers and contractors to generate open innovation, and develop and improve the products it manufactures as well as its internal processes.
- h) It will study any technological advance that could arise within the supply chain to reduce negative environmental impacts.
- i) It will guarantee the confidentiality of information, ensuring the non-disclosure to third parties of the data of suppliers and contractors involved in the Acerinox Group's supply chain.
- j) It will apply due diligence and adequate monitoring of the basic principles of action established in this Policy, and will define indicators that allow for the setting of annual objectives to analyse the level of implementation thereof and prevent the Group's and its customers' sustainability commitments from being affected.

5.- Validity, critical review and updating

This General Responsible Purchasing Policy will come into force from 1 January 2022 onwards.

This Policy will be critically reviewed in view of the objectives achieved and, where appropriate, updated to adapt it to possible changes that may occur in general applicable regulations.

The monitoring, verification of compliance and updating of these principles and objectives is the responsibility of all the executives of the Group companies.

6.- Body of Sustainability Regulations

Following is a list of the policies that, together with this General Responsible Purchasing Policy, have been adopted by the Acerinox Group in order to establish and achieve its sustainability objectives:

- a) General Sustainability Policy of the Acerinox Group.
- b) General Human Rights Policy of the Acerinox Group.
- c) General Equality, Diversity and Inclusion Policy of the Acerinox Group.

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- d) General Health and Safety at Work Policy of the Acerinox Group.
- e) General Recruitment and Promotion Policy of the Acerinox Group.
- f) General Responsible Purchasing Policy of the Acerinox Group.
- g) General Sustainable Production and Marketing Policy of the Acerinox Group.
- h) General Climate Change Policy of the Acerinox Group.

These policies, as well as the rest of those adopted by the Acerinox Group, can be consulted at the following link:

https://www.acerinox.com/en/accionistas-e-inversores/gobierno-corporativo/politicas-generales/index.html

The following are also part of the Group's Sustainability Policies:

- a) The Code of Conduct and Good Practices of Acerinox, S.A. and its corporate Group.
- b) Any other rules or standards approved in the future by the Board of Directors of Acerinox, S.A. and those approved by the various companies of the Group in the implementation of the above.

Approved by: the Board of Directors of ACERINOX, S.A.