



# GENERAL POLICIES

## Safety, Health, and Environment Policy of the Acerinox Group

February 26, 2025



# SAFETY, HEALTH, AND ENVIRONMENT POLICY OF THE ACERINOX GROUP

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# SAFETY, HEALTH, AND ENVIRONMENT POLICY OF THE ACERINOX GROUP

## I) INTRODUCTION AND PURPOSE

The Board of Directors of Acerinox, S.A. (hereinafter, “**Acerinox**” or the “**Company**”), as a listed company, holds the legally non-delegable authority to establish the general policies and strategies of the Company and of the Group of which it is the parent company. The Safety, Health, and Environment Policy of the Acerinox Group (hereinafter, the “**Policy**”) aims to affirm Acerinox's commitment to safeguarding the health and safety of its employees and protecting the environment.

This Policy considers the Code of Conduct and Good Practices of Acerinox, S.A. and its Group of companies, the General Sustainability Policy of the Acerinox Group, the Sustainability Due Diligence Policy of the Acerinox Group (in particular), and the Human Rights Policy of the Acerinox Group. It aligns with key international standards on human rights and sustainability, such as the United Nations Sustainable Development Goals (hereinafter, the “**SDGs**”), and other complementary documents and texts.

In compliance with sustainability due diligence obligations, the Acerinox Group is committed to implementing effective measures to identify and manage the risks and adverse impacts on occupational health and safety, as well as those related to the environment, that may result from its products, services, and operations. This commitment also extends to its dealings with individuals or entities that have commercial relationships with the Acerinox Group (hereinafter, referred to as “**Business Partners**”) throughout its chain of activities (hereinafter, the “**Activity Chain**”).

In accordance with the foregoing, the Company's Board of Directors approved this Safety, Health, and Environment Policy for the Acerinox Group at its meeting on February 26, 2025.

## II) SCOPE OF APPLICATION

This Policy applies to Acerinox and entities within the Acerinox Group (hereinafter, the “**Acerinox Group**” or the “**Group**”) and, as such, is applicable to all its directors, managers, and employees.

Subsidiaries may develop their own regulations, but these must comply with this Policy and other internal regulations established by Acerinox for the Group. They must also consider the specific legal requirements of the markets in which they operate. Subsidiaries are required to provide all necessary information to the Company and cooperate to ensure the effective implementation of this Policy.

The different entities within the Group will ensure that the principles of the Policy are applied, where appropriate and to the extent applicable, to the individuals or legal entities that have commercial relationships with any of the entities comprising the Acerinox Group (hereinafter, the “**Business Partners**”) throughout their chain of activities (hereinafter, the “**Activity Chain**”).

For entities not controlled by Acerinox and its subsidiaries, the promotion of principles that align with this Policy will be encouraged.

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Where relevant, this Policy also applies to joint ventures, temporary business associations, and similar partnerships where Acerinox or its subsidiaries take on a management role.

In implementing this Policy's principles, Acerinox Group entities will engage constructively with parties involved in their business activities. This includes investors, shareholders, employees and their representatives, as well as the Business Partners in the Activity Chain (including contractors), national institutions, and legitimate representatives of these individuals and groups (the "**Stakeholders**").

### **III) GENERAL PRINCIPLES**

Safety is one of the key values guiding Acerinox's efforts to solidify its leadership in the stainless steel and high-performance alloys manufacturing sectors. This safety concept includes the physical and mental well-being of all Group members, sustainable environmental protection, and asset protection.

The Acerinox Group operates with the belief that all negative environmental incidents and impacts can be prevented and avoided, focusing on risk management to reduce, minimize, or eliminate them.

Operational Excellence is a key factor for the Acerinox Group in maintaining its safety, health, and environmental standards among the top in the steel industry. By clearly defining expectations and allocating necessary resources, Acerinox fosters continuous improvement through balanced, measurable objectives and goals, ensuring transparent, truthful, and reliable reporting to the markets.

To this end, the Group adopts and promotes the following general principles to guide all activities related to safety, health, and the environment, as well as, when applicable, those of its Business Partners within the Activity Chain:

- a) Comply with all current laws and regulations regarding occupational hazard prevention and environmental protection. Ensure that every workplace maintains a safety, health, and environmental management system that aligns with applicable local regulations and, when relevant, international standards.
- b) Continuously identify and assess risks, especially those stemming from organizational changes or modifications to internal structures, facilities, and processes. Implement suitable measures to prevent, manage, mitigate, and, whenever possible, eliminate these risks.
- c) Integrate preventive measures across all activities and organizational levels. Collaborate with employees, clients, Business Partners, specialized organizations, public authorities, and other Stakeholders to effectively identify and manage risks, opportunities, and impacts.
- d) Develop preventive measures to minimize risks to worker health and safety, as well as environmental and asset impacts. Allocate necessary resources to ensure these measures are effective.
- e) Protect the environment by optimizing energy use, managing and safeguarding water quality, reducing noise pollution, and mitigating effects on soil and natural surroundings resulting from the Group's activities. Encourage sustainable use and

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consumption of resources, raw materials, and waste by promoting the circular economy.

- f) Set, review, and, when necessary, update safety, health, and environmental performance indicators. Use these indicators to evaluate the management system's efficiency. These indicators allow proactive responses before incidents occur or impacts become evident and support establishing short, medium- and long-term goals to track progress in this area.
- g) Cultivate a safety culture within the Group through outreach, awareness programs, and training initiatives that promote both individual and collective responsibility. Ensure all personnel, whether internal or external, are properly qualified.
- h) Respond immediately and with zero tolerance to any malicious actions or unsafe behaviors that threaten the safety of individuals, the environment, or the Group's assets. Establish incentives, reward systems, and proactive recognition for positive actions and contributions in this area.
- i) Promote communication, consultation, and active participation of employees and other Stakeholders as a crucial component in implementing safety, health, and environmental management systems.
- j) Ensure information confidentiality, uphold privacy rights, and fully comply with data protection laws, while implementing appropriate information security measures.
- k) Actively ensure that all products produced and sold are safe and comply with the strictest product safety regulations throughout their life cycle.
- l) Plan and execute contingency and business continuity plans to manage serious incidents.

Implement a management system at work sites that meets the requirements set by applicable local regulations while also considering international standards for safety, health, and the environment.

### **IV) GOVERNANCE**

The Governance foundations regarding sustainability, as outlined in the General Sustainability Policy of the Acerinox Group, form an integral part of this Policy.

### **V) POLICY DISSEMINATION**

Acerinox will actively promote the dissemination of this Policy within the Company and its Group, also considering Business Partners and Stakeholders connected with the Group's activities.

The Policy will be available to shareholders and other Stakeholders on the Company's corporate website, alongside other corporate policies and sustainability standards.

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## ***VI) REVIEW, UPDATING, AND IMPLEMENTATION***

This Policy will be reviewed and updated as necessary, considering regulatory changes, international standards, or criteria set by supervisory and control authorities, as well as changes affecting the structure and activities of the Acerinox Group.

The Policy will enter into force upon approval by the Acerinox Board of Directors, although the Group may adhere to timelines outlined in applicable regulations regarding the enforceability of obligations in this area.

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