



# GENERAL POLICIES

## General Sustainability Policy of the Acerinox Group

February 26, 2025



# GENERAL SUSTAINABILITY POLICY OF THE ACERINOX GROUP

## TABLE OF CONTENTS

<b>I) INTRODUCTION AND PURPOSE</b>	<b>2</b>
<b>II) SCOPE OF APPLICATION</b>	<b>2</b>
<b>III) GENERAL PRINCIPLES</b>	<b>3</b>
<b>IV) STAKEHOLDERS</b>	<b>4</b>
<b>V) TRANSPARENCY AND INTEGRITY IN SUSTAINABILITY INFORMATION</b>	<b>5</b>
<b>VI) GOVERNANCE</b>	<b>6</b>
A) <i>Board of Directors</i>	6
B) <i>Sustainability and Audit Committees</i>	6
C) <i>Management Committee</i>	6
D) <i>Sustainability Department</i>	6
<b>VII) POLICY DISSEMINATION</b>	<b>7</b>
<b>VIII) REVIEW, UPDATING, AND IMPLEMENTATION</b>	<b>7</b>

# GENERAL SUSTAINABILITY 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 General Sustainability Policy of the Acerinox Group (hereinafter, the “**General Sustainability Policy**” or the “**Policy**”) aims to set the principles guiding the sustainability strategy and management guidelines of the Acerinox Group.

These principles align with Acerinox's values and strategy, consider the Sustainable Development Goals (hereinafter, “**SDGs**”), and adhere to the Paris Agreement and the Ten Principles of the UN Global Compact. They also reflect the evolving sustainability regulations in the countries where the Acerinox Group operates, particularly driven by the European Union and its influence in Spain.

In terms of sustainability governance, the Policy incorporates recommendations, best practices, and standards established by supervisory authorities and esteemed organizations.

The principles of the Policy are further developed and detailed in various policies, procedures, instructions, and plans that form the internal regulations concerning environmental and social matters. These principles are also interpreted and complemented in coordination with the diverse rules constituting the Company's corporate governance system, such as the Code of Conduct and Good Practices of Acerinox, S.A. and its Group of companies, and the General Risk Control and Management Policy of Acerinox, S.A. and its Group of companies.

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

## II) SCOPE OF APPLICATION

The General Sustainability Policy is applicable to Acerinox and the entities within the Acerinox Group (hereinafter, the “**Acerinox Group**” or the “**Group**”).

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 or

## GENERAL SUSTAINABILITY POLICY OF THE ACERINOX GROUP

its subsidiaries, the promotion of principles that align with this Policy will be encouraged.

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.

The principles of the Policy also extend to the groups associated with the business activities of the Acerinox Group (hereinafter, the “**Stakeholders**”).

### III) GENERAL PRINCIPLES

The Acerinox Group's sustainability strategy seeks to ensure all business activities promote the sustainable creation of value for shareholders and other Stakeholders.

This strategy centers on core objectives: protecting people, assets, and the environment, mitigating climate change, and respecting human rights.

To achieve and integrate these objectives into the business model, the Group commits to and advocates the following principles to guide its actions:

- a) **Comply with existing laws** in all jurisdictions where the Group operates and voluntarily adopt best practices aligned with this Policy.
- b) Develop a business model founded on **management systems that are economically viable, environmentally sustainable, and socially inclusive**.
- c) **Prevent, manage, and mitigate adverse effects** on human rights and the environment arising from business activities across the entire Activity Chain.
- d) Strive to **combat climate change** by implementing energy efficiency measures, encouraging the use of renewable energy, and optimizing water consumption to reduce greenhouse gas emissions; **and, if necessary, adapt to climate change effects**.
- e) Promote **research, development, and innovation**, ensuring new technologies are used effectively to modernize organizational and production processes, contributing to economic decarbonization and sustainable value creation.
- f) Foster the **circular economy** by producing fully recyclable products, maximizing the use of recycled and reused materials throughout the Activity Chain, and supporting recycling and waste recovery.
- g) Ensure the **responsible and sustainable use of natural resources**, particularly raw materials and water, while **protecting and enhancing biodiversity and ecosystems** throughout the entire Activity Chain.
- h) **Honor human rights** as outlined by the United Nations Charter and related standards, integrating them as a fundamental part of the ethical values and

## GENERAL SUSTAINABILITY POLICY OF THE ACERINOX GROUP

conduct of the Group's entities, and ensure their respect and protection across the Activity Chain.

- i) Maintain **suitable working conditions that ensure people's health and safety** by implementing and regularly reviewing management strategies and systems that follow the best available techniques and practices.
- j) Build **professional relationships grounded in the principles of dignity, equality, merit, and capability, while attracting talent and encouraging diversity and inclusion.**
- k) Encourage **value creation and foster the development of a more prosperous and sustainable environment in the communities** where the Group operates.
- l) Foster **ethical commitments and responsibilities** in business management and throughout the entire Activity Chain, in alignment with the Acerinox, S.A. Code of Conduct and Good Practices, as well as other regulatory developments.
- m) Establish **relationships of trust and respect with the various Stakeholders** of the Acerinox Group, considering their interests and concerns as integral to management decision-making processes.
- n) **Develop indicators to set short, medium, and long-term sustainability objectives and measure progress** in this area.
- o) Support and contribute to **achieving the Sustainable Development Goals (SDGs) and the Ten Principles of the United Nations Global Compact.**

### IV) STAKEHOLDERS

The Acerinox Group believes that maintaining responsible relationships with its Stakeholders is essential for creating sustainable and shared value.

Therefore, it has developed a Stakeholder Map that identifies the following groups:

- a) Shareholders and investors:
- b) Members of the Acerinox Group (including Directors, Senior Management, and Employees)
- c) Customers.
- d) Business Partners.
- e) Local communities near the Group's production centers.
- f) Administrative bodies responsible for granting and enforcing permits, authorizations, or licenses within their jurisdiction.

## GENERAL SUSTAINABILITY POLICY OF THE ACERINOX GROUP

g) Civil society.

The relations of the entities that make up the Acerinox Group with the Stakeholders shall be governed by the following principles:

- a) **Respect**, as means of fostering mutual trust.
- b) **Transparency in information**, ensuring that relevant information is shared with Stakeholders accurately and transparently.
- c) **Participation and engagement**: creating channels, mechanisms, or tools to facilitate constant, two-way communication.
- d) **Collaboration**: enhancing the effectiveness of the Acerinox Group's sustainability strategy and supporting the achievement of the Sustainable Development Goals (SDGs).
- e) **Identifying and understanding stakeholder concerns and expectations** about sustainability issues related to the Group's activities.
- f) **Regularly reviewing** relationship mechanisms to ensure their effectiveness and incorporating practices or tools for improvement.

All interactions between Acerinox, its subsidiaries, and Stakeholders will fully comply with applicable privacy and data protection laws, and appropriate information security measures will be implemented.

### ***V) TRANSPARENCY AND INTEGRITY IN SUSTAINABILITY INFORMATION***

The Acerinox Group is deeply committed to ensuring transparency and integrity in its information. This commitment is crucial for building trust and credibility with markets, investors, and other Stakeholders across its value chain.

The Group will provide timely and comprehensive information on all matters outlined in relevant regulations, specifically including:

- a) The processes used to identify, assess, and manage sustainability incidents, risks, and opportunities (hereinafter, "**IROs**").
- b) How the Group's strategy and business model engage with significant sustainability-related IROs, detailing the approaches taken to address them.
- c) The Group's achievements and progress concerning sustainability issues.
- d) The governance processes, controls, and procedures employed to oversee, manage, and monitor sustainability-related IROs.

Subsidiaries of the Acerinox Group will provide all necessary information on these topics and cooperate to adhere to the Policy's principles and commitments regarding

## **GENERAL SUSTAINABILITY POLICY OF THE ACERINOX GROUP**

transparency and integrity in sustainability information.

This information will undergo external verification and be presented in accordance with the applicable regulatory terms.

### ***VI) GOVERNANCE***

The Policy includes the framework for the Group's governance on sustainability:

#### ***A) Board of Directors***

The Acerinox Board of Directors is responsible for setting strategic objectives and management guidelines regarding sustainability. It also monitors and oversees the sustainability strategy affecting the Company and its Group.

#### ***B) Sustainability and Audit Committees***

The Sustainability and Audit Committees are tasked with ensuring the implementation and development of this Policy within the Company and the Group. They fulfill these roles through their supervisory and control functions as outlined in the Acerinox Board of Directors' Regulations.

The Audit Committee of the Group will oversee the mandatory reporting on these matters.

#### ***C) Management Committee***

The Acerinox Management Committee oversees the implementation of the sustainability strategy at the Group level, with support from the Sustainability Department, which coordinates and promotes these efforts. Any regulations adopted by the Group's subsidiaries must align with the principles of this Policy and the management guidelines set by the Acerinox Board of Directors concerning the Group.

#### ***D) Sustainability Department***

A dedicated department will handle sustainability responsibilities, led by an individual appointed by the CEO of Acerinox. This department will be supported by leaders from various internal areas.

It will coordinate the preparation of sustainability information for each financial year to present to the Sustainability and Audit Committees of Acerinox, as well as to the Board of Directors.

The Sustainability Department is responsible for developing proposals for internal plans, procedures, and protocols to implement and advance this Policy and other corporate sustainability regulations, especially the Sustainability Due Diligence Policy of the Acerinox Group.

## **GENERAL SUSTAINABILITY POLICY OF THE ACERINOX GROUP**

It also manages and oversees the effectiveness of adopted measures for practical implementation, coordinating with relevant internal departments as needed.

The Sustainability Department regularly reports to the Acerinox Sustainability Committee and Audit Committee concerning their areas of responsibility.

### ***VII) 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.

### ***VIII) 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 in sustainability, as well as changes affecting the structure and activities of the Acerinox Group.

The General Sustainability Policy will enter into force upon approval by the Acerinox Board of Directors.

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