



Report on Related-Party Transactions for the year ending December 31, 2023

Madrid, February 28, 2024



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REPORT BY THE AUDIT COMMITTEE OF ACERINOX, S.A., ON RELATED-PARTY TRANSACTIONS CORRESPONDING TO THE 2023 FINANCIAL YEAR, IN COMPLIANCE WITH RECOMMENDATION 6 LETTER C) OF THE GOOD GOVERNANCE CODE

I.- Introduction

The Good Governance Code of Listed Companies, approved by the Spanish National Securities Market Commission (CNMV) on February 18, 2015, and subsequently revised in June 2020, recommends (see Recommendation 6) that publicly listed companies prepare and publish certain reports on their websites, including a report by the Audit Committee on related-party transactions. Therefore, the Audit Committee of Acerinox, S.A. ("**Acerinox**" or the "**Company**"), following the aforementioned recommendation, has prepared this report.

II.- Applicable law

The revised text of the Spanish Capital Companies Act, approved by Royal Legislative Decree 1/2010, of July 2 ("**LSC**"), establishes the regime applicable to transactions that listed companies enter into with related parties, specifically regulated in articles 529 vicies to 529 tercies of the LSC.

The legal regime, which defines related-party transactions on the basis of the concept of the related party, establishes which related-party transactions are subject to approval by the Annual Shareholders' Meeting and which fall under the authority of the board of directors, while taking into account the possibility that the board of directors may delegate the approval of related-party transactions that meet certain legal requirements. For these transactions, the board of directors must adopt an internal information and regular monitoring procedure involving the Audit Committee; this procedure will allow the fairness and transparency of these transactions to be verified, as well as (where relevant) verifying compliance with the legal criteria authorizing delegation by the board.

In accordance with the above, the board of directors of Acerinox, at its meeting held on December 16, 2021, approved the Company's Approval Protocol for Related-Party Transactions (the "**Protocol**"). Based on the provisions regarding related-party transactions established in the LSC, the Company's bylaws, the regulations of the Annual Shareholders' Meeting, and the regulations of the Acerinox board of directors, the Protocol implements the application criteria regarding the approval system for related-party transactions affecting the Company, as well as for the publication of information about them. It also establishes an internal procedure for the identification, analysis, approval, monitoring, information, and control of related-party transactions.

III.- Application of the Acerinox, S.A. Protocol for Related-Party Transactions in 2023

In accordance with the provisions of the Protocol, the Company has an operating group to assess possible related-party transactions and, if applicable, to coordinate the procedure to be followed for their submission to the relevant internal Acerinox body or authority for approval.

As established by the Protocol, the operating group comprises the chief financial officer, the chief compliance officer and the secretary of the Audit Committee, who acts as secretary of the operating group.

In order to verify that the Protocol is being applied properly, the operating group has issued a report on its activities for fiscal year 2023, the conclusions of which are endorsed by the Audit Committee. The report concludes, without prejudice to the analysis of various transactions to confirm or rule out their status as related-party transactions, that none of them met the requirements to be considered related-party transactions under the regime set forth in the LSC.

IV.- Related-party transactions carried out by Acerinox, S.A. or its subsidiaries in 2023

Based on the foregoing, the Audit Committee concludes that during fiscal year 2023 the Company has not carried out any related-party transactions in accordance with the provisions of articles 529 vicies to 529 tervicies of the LSC, having applied the provisions of the Protocol in this regard.

The Company has reported on this in the Annual Corporate Governance Report for fiscal year 2023, without prejudice to the information included in the notes to the financial statements on transactions that, from an accounting point of view, are considered to be related-party transactions.

Date of approval by the Audit Committee: February 23, 2024

Date of presentation to the board of directors: February 28, 2024

