



# Operating instructions for the Electronic Shareholder Forum

Madrid, March 12, 2024



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# ACERINOX, S.A.

## RULES OF OPERATION FOR THE ELECTRONIC SHAREHOLDER FORUM APPROVED BY THE BOARD OF DIRECTORS AT ITS MEETING ON MARCH 12, 2024

### I. Introduction

Pursuant to article 539.2 of the revised text of the Spanish Capital Companies Act, approved by Royal Legislative Decree 1/2010, of July 2 (hereinafter, LSC), ACERINOX, S.A. has set up an Electronic Shareholder Forum on the Company's website to hold its Annual Shareholders' Meetings.

The board of directors of ACERINOX, S.A., at its meeting of March 12, 2024, approved this document, namely the "Rules of Operation for the Electronic Shareholder Forum" (hereinafter, the Rules of Operation).

### II. Electronic forum concept

This is a space available on the Company's website where, in accordance with the LSC, shareholders may publish proposals, accompanied by their contact details, to enable communication between shareholders.

The forum is not a mechanism for online digital conversation among shareholders, nor is it a place for virtual debate. Neither does the forum constitute a channel of communication between the Company and its shareholders.

### III. Purpose of the forum

The forum has been made available to facilitate communication between the shareholders of ACERINOX, S.A. (individuals, natural and legal persons, and any voluntary associations that may be formed) prior to the holding of the Annual Shareholders' Meetings.

Shareholders may submit posts to the in the forum that, in accordance with the LSC, serve as:

- I. Publications of proposals intended for submission in addition to the agenda announced in the notice of call.
- II. Requests for support for such proposals.
- III. Initiatives to reach a sufficient percentage to exercise a minority right outlined in law.
- IV. Offers or requests for voluntary representation.

### IV. Forum access and use

Access to and use of the forum is reserved exclusively to individual shareholders of ACERINOX, S.A. and to voluntary associations of shareholders registered in the Register set up for this purpose by the Spanish National Securities Market Commission (CNMV).

To access the forum, shareholders and voluntary associations must sign up as registered users. To do so, they must complete the forum access request form.

This form shall indicate the contact details to be published in the forum so that interested shareholders may contact each other regarding posts on the forum.

In order to formally submit the application for registered user status, the user must accept the Rules of Operation.

ACERINOX, S.A. will send forum access codes to registered users at the email address they provide.

Once a registered user has been approved by ACERINOX, S.A., access to and use of the forum will require the user to complete a special use form. Via this form, the registered user must legally declare that there have been no changes to the circumstances that permitted their admission as registered user.

The period of operation of the forum shall be from the date of publication of the call convening the Annual Shareholders' Meeting until the date on which the meeting is held.

## V. Posting to the forum

Shareholders registered as users may submit proposals relating to the matters indicated in section III. The Company's administrator will post these to the forum, provided that the administrator considers these to be in accordance with the law and the Rules of Operation.

Proposals published in the forum will include the following shareholder identification information (provided via the registered user form):

- name and surname/company name and identification of its representative, in the case of legal entities;
- number of shares owned; and
- contact information indicated by the shareholder via the form, in order to facilitate communication with other interested shareholders.

ACERINOX, S.A. may decline to post to the forum or remove from it at any time communications that it considers to be non-compliant with applicable law and/or these Rules of Operation.

Posts containing comments that are disrespectful, offensive, xenophobic, racist, or violent, will not be posted to the forum, nor will any posts likely to break the law in any way or that are not suitable for the nature or scope of the forum in general.

ACERINOX, S.A. is not responsible for the accuracy, veracity, validity, legality, or relevance of forum posts. Likewise, ACERINOX, S.A. has the power, but not the obligation, to monitor the content of posts appearing in the forum; these are the sole responsibility of the shareholders who post them.

No personal data or third-party information may be entered without the express and documented consent of the person concerned; impersonating others is also prohibited.

The publication of posts on the forum is conditional upon the user's maintaining their status at all times as a shareholder of ACERINOX, S.A. or as a voluntary association of shareholders duly constituted and registered in the CNMV. If ACERINOX, S.A., in its capacity as the administrator of the forum, should at any time question the fulfillment of these conditions, it may require the user to provide accreditation of their continued status, being able to request any information or documentation deemed appropriate to verify the ends provided for here. Likewise, the shareholder accepts the obligation to provide the Company with extremely prompt notification of the loss of shareholder status, if applicable.

In no case may a post made or published via the forum be understood as a notification to ACERINOX, S.A. to exercise any shareholder rights, either individual or collective (adding agenda items, remote voting, etc.), nor does it supplement the requirements outlined in law, the Company's bylaws, or the Company's internal regulations for the exercise of any of the said rights or the performance of shareholders' initiatives and actions. All rights and powers that shareholders wish to exercise must be exercised through the legally established channels; the forum is not, under any circumstances, a valid channel for these purposes.

In order to exercise these rights, and for any other matters, shareholders may contact the Company through the Shareholders' Office, whose contact details appear on the Company's website.

After the conclusion of the Annual Shareholders' Meeting, ACERINOX, S.A. reserves the right to erase and delete all posts regarding said meeting.

## VI. Protection of personal data

The personal data provided by the shareholders for the use of the forum will be processed by ACERINOX, S.A., as the data controller, to manage and supervise the operation of the forum (legitimate basis: the execution of these Rules of Operation), as well as to manage each year's Annual Shareholders' Meeting of ACERINOX, S.A. (in compliance with the legal obligations of ACERINOX, S.A.), and to carry out statistical analyses of the Company's shareholders (in accordance with ACERINOX, S.A.'s legitimate interest in knowing which shareholders are participating in the forum).

The personal data processed will only be shared with governmental authorities and agencies when necessary to comply with a legal obligation, and may be processed by technology or systems service providers and entities hired to operate the forum. In any case, no international transfers will be made and your data will not be subject to automated decisions.

The data will be kept only as long as necessary for the fulfillment of the aforementioned purposes and, subsequently, for the period established by law to be able to comply with any legal or contractual issues.

Shareholders accessing the forum may exercise their right to data access, rectification, opposition, and suppression, as well their right to portability and limitation of processing, under the terms established in current legislation, by contacting the Data Protection Officer of ACERINOX, S.A., at their mailing address in Madrid, 28035, Calle Santiago de Compostela

no. 100, or at the email [dpo@acerinox.com](mailto:dpo@acerinox.com), providing a copy of their Spanish National ID (DNI) or legally valid supporting document, and indicating which right they wish to exercise.

If, in the exercise of such rights, the data provided by a shareholder to the Company are rectified or deleted at the shareholder's request, ACERINOX, S.A. shall proceed to rectify or delete the posts that, at the shareholder's request, have been published in the forum.

Likewise, if you are not satisfied with the exercise of your rights, you may contact the Data Protection Officer by email at the following address [dpo@acerinox.com](mailto:dpo@acerinox.com), or file a complaint with the Spanish Data Protection Agency through the website [www.aepd.es](http://www.aepd.es).

ACERINOX, S.A. reserves the right to modify, at any time and without prior notice, the presentation, configuration, operation, and content of the forum, as well as the conditions for its use, without prejudice to legal provisions.

## VII. Absence of license

ACERINOX, S.A. authorizes the registered users to make use of the intellectual and industrial property rights related to the software installed on the server of ACERINOX, S.A., or a third party that provides the services comprising the forum, exclusively for the purposes set forth in section III above (Purpose of the forum) and according to the provisions of these Rules of Operation. The registered user shall refrain from obtaining, or attempting to obtain, access to and use of the forum and its contents by means or procedures other than those which have been made available or indicated for that purpose in each case.

ACERINOX, S.A. does not grant any type of license or usage authorization of any kind for its intellectual and industrial property rights or for any other forum-related property or right other than that provided for in the preceding paragraph.

## VIII. Cost of use

Access to and use of the forum by registered users is free of charge, except for the cost of connection through the telecommunications network offered by the access provider contracted by each registered user.

## IX. Contact inbox

Registered users who have suggestions or proposals for improving the forum, who require technical assistance, who wish to report content that does not comply with these Rules of Operation or who wish to exercise their rights under personal data protection law may contact the Company's email address ([dpo@acerinox.com](mailto:dpo@acerinox.com)), which will be provided for this purpose on the forum. The purpose of this inbox is to provide service to registered users and to improve the quality of the forum, without implying any administrative monitoring or liability.

Madrid, March 12, 2024