



GENERAL POLICIES

General Human Rights Policy of the Acerinox Group

16 December 2021



1. - Introduction

The purpose of this Policy is to establish the commitments of the Acerinox group and its various companies to Human Rights.

The scope and contents of Human Rights will be interpreted in accordance with the principles established in the United Nations Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work and its Follow-up Procedure of the International Labor Organization and the Guiding Principles on Business and Human Rights of the United Nations, as well as any other matter included in the Code of Conduct and Good Practices of Acerinox, SA and its corporate Group.

2. - Sphere of application

This Policy applies to all the companies that make up the Acerinox Group and binds all the governance bodies of the Group and their companies, the managers, workers and, as appropriate, the persons or entities that provide services or that supply goods to Group companies.

3.- Basic principles of action

To achieve the objectives and commitments set out above, the Group assumes and promotes the following basic principles that must govern its actions in all areas:

- a) Promote a culture of respect for Human Rights and specific training and communication actions aimed at raising the awareness of professionals in this area at all the Group's companies.
- b) Identify the potential impacts that the operations and activities carried on by the Group -directly or through a third party- may have on Human Rights.
- c) Implement a due diligence system to identify the highest risk situations and activities, and develop mechanisms to prevent and mitigate such risks, and, in the event that damage has occurred, to repair or mitigate the consequences. The assessment of this system will be made public.
- d) Using the Group's internal control systems, regularly assess the effectiveness of the due diligence system through monitoring indicators, which make it possible to establish medium- and long-term sustainability objectives, and measure the degree of progress achieved.

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- e) The Group will have complaint and grievance mechanisms in place for the main violations that may occur in this area. These procedures are based on the principles of a right to a fair hearing and the rule of *audi alteram partem*, and will respect the presumption of innocence. It will also provide for the adoption of interim measures, which will be taken when requested or where necessary.
- f) Human Rights violations may lead to the reporting thereof to the competent authorities, the provision of protection of victims and the prosecution of perpetrators.

4.- Body of Human Rights Regulations

In addition to this Policy and the others that have been approved in the area of sustainability, the Acerinox Group has other rules and regulations that contribute to achieving the objectives established therein:

- a) The Code of Conduct and Good Practices of Acerinox, S.A. and its corporate Group, as well as the General Policies on Social Relations, Health and Safety, Equality and Diversity.
- b) The General Policies regarding the protection of personal data and IT security.
- c) The General Prevention and Compliance Policy.
- d) The contracting rules of the Acerinox Group companies, which may establish contractual consequences for cases in which there is evidence of non-compliance in this area.
- e) The rules that approve the means of complaint, protection and defence in the case of Human Rights violations.
- f) Any others approved in the future by the Board of Directors of Acerinox, S.A. and the governance bodies of the various companies, in accordance with the provisions of this Policy.

5.- Declarations

The Acerinox Group on its behalf and on behalf of each of its companies:

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- a) Rejects child labour and forced or compulsory labour. "Child labour" means any work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development; specifically, that which is dangerous and detrimental to the physical, mental or moral well-being of children, and/or interferes with their schooling.
- b) Respects freedom of association and collective bargaining under the terms of the legislation of each country.
- c) Remunerates its employees with wages that are competitive in relation to the industry and the local market. The remuneration policy is communicated to employees and complies with minimum wage criteria to ensure a decent standard of living, as well as maximum overtime and minimum necessary rest.
- d) Rejects unfair discrimination on any grounds and promotes equal opportunities.
- e) Promotes diversity and inclusion and considers them to be generators of benefits for society in general, for the company and for its employees.
- f) Identifies and respects vulnerable groups in the areas of influence of its operations (indigenous peoples, disadvantaged groups, etc.).
- g) Respects the environment and recognises its importance in the fundamental rights of society, such as access to water and other ecosystem services.
- h) Protects the health and safety of its workers and contractors, as well as the health and safety of communities in the area of influence of its operations.
- i) Consults with different stakeholders on issues that may affect them and addresses their concerns about the Acerinox Group's operations. Makes available to any interested party an ethics hotline where complaints can be made with the assurance that they will be dealt with.
- j) Is committed to maintaining a working environment free from violence, mobbing or any other intimidating behaviour. Depending on the assessments carried out at each operating centre, security services will be put in place to guarantee the well-being of employees and the safety of the facilities.

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- k) The Acerinox Group is committed to the investigation of any allegation of human rights violations and to their remediation in the event that they are proven to have occurred.

6.- Validity, critical review and updating

This General Human Rights 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 Group's governance bodies will ensure that the internal services, with or without the assistance of external consultants, apply the best available techniques for the protection of Human Rights at all times.

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

7.- Body of Sustainability Regulations

Following is a list of the policies that, together with this General Human Rights 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.
- 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.

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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/gobierno-corporativo/General-Policies/>

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.