



## **GENERAL POLICIES**

### **2.- General Policy of Corporate Social Responsibility of Acerinox, S.A. and its Group of Companies**

## **GENERAL POLICY OF CORPORATE SOCIAL RESPONSIBILITY OF ACERINOX, S.A. AND ITS GROUP OF COMPANIES**

The ACERINOX, S.A. ("Acerinox" or "the Company") Board of Directors is responsible for the ongoing approval, design, assessment and review of the Company's Corporate Government System, and for approving the Corporate Policies that implement the principles set out in the Companies Act and in the Good Governance Code of Listed Companies, which contain guidelines that govern the actions of the Parent Company and that of the companies that form part of the Group, as well as its directors, managers, and employees.

Among Corporate Policies, the goal of those concerning Corporate Social Responsibility is to promote a culture of social responsibility, with global characteristics, throughout the Group that helps improve the well-being of persons, boosts the economic and social development of the communities where the group is present, and creates sustainable value for shareholders, investors, employees, clients, suppliers and creditors, for the territories in which the Group performs its business, for the environment, the regulatory bodies, and the media (the "stakeholders").

The aim of the General Policy of Corporate Social Responsibility is to establish the basic principles and general action framework for the management of corporate social responsibility practices taken on by the Company and the Group, and to serve as the base for the integration of social responsibility in the Group's business model and strategy. The General Policy of Corporate Social Responsibility is developed and supplemented through the different Policies of Social Responsibility that cater to specific needs and expectations on a local level, or regarding specific stakeholders.

The General Policy of Corporate Social Responsibility applies to all Companies that form part of the Group. Management of said policy in each Company shall promote the alignment of its own policies with those of the Group, and shall implement the measures necessary for its implementation in order for them to follow principles and guidelines that are consistent with those established in this Policy.

### **I.- Goals of the General Policy of Corporate Social Responsibility**

Acerinox and the other companies that belong to the Group develop their business project and their own responsible business model with the goal of being innovative, transparent, inclusive, open, and committed companies able to create sustainable value for their stakeholders.

The knowledge, circulation, and implementation of the values expressed by the Group's commitment in terms of business ethics and corporate social responsibility serve to guide the actions of the Board of Directors, its committees, and other Company bodies in their relationships with stakeholders.

Specifically, the instruments implemented by the Group must:

- Help achieve the strategic goals of the Group, for the purpose of offering a quality and environmentally-friendly product.
- Improve the competitiveness of the Group through the introduction of management practices based on innovation, equal opportunities, productivity, profitability, and sustainability.
- Responsibly manage risks and opportunities stemming from the evolution of its environment, as well as maximizing positive impacts on its activities in the different territories where it operates, and minimizing negative impacts as far as possible.
- Encourage a culture of ethical behaviour and increase business transparency by generating credibility and trust with and between stakeholders.
- Contribute to improve the reputation and outside recognition of the Group.

## **II.- Principles of the Policy**

### **1. General action principles**

To achieve the aforementioned goals in terms of corporate social responsibility, Acerinox adopts the following general action principles.

- Comply with current legislation in the countries and territories in which it operates, adopting in a voluntary and supplementary manner international commitments, standards and guidelines where the legal system is not adequately or sufficiently developed.
- Support, through its adoption and circulation, the integration of the principles of the United Nations Global Compact as well as that of other international instruments, especially those concerning human rights, labour practices, the environment, and the fight against corruption.
- Follow the Corporate Governance System guidelines and, especially, the Code of Good Practices of Acerinox S.A. and the companies that make up its Group. This code sets out the Company's commitment to the principles of business ethics and transparency in all scopes of action, and regulates the responsible behaviours of all of the Group's professionals in the performance of their activities.

- Encourage free market practices, rejecting any kind of illegal or fraudulent practice, implementing effective mechanisms for the prevention, monitoring, and sanction of any irregularity.

Specifically, to take on the commitment of pursuing and prosecuting any practice of corruption that becomes evident within the Group in any of the territories where it operates.

- Adopt advanced corporate governance practices in line with those generally acknowledged in international markets, based on business transparency and mutual trust with stakeholders.
- Promote channels of communication and dialogue, as well as favour the Group's relationships with its shareholders, investors, employees, clients, suppliers and, in general, with all of its stakeholders in accordance with what is established in the Policy regarding relationships with stakeholders. The purpose of this is to strike a balance between business values and social expectations and to adapt, whenever possible, the Group's policies and strategies to their interests, concerns and needs, using any and all instruments of communication at its disposal, such as direct contact, social networks, the Company's corporate website and those of the different companies that belong to the Group.

## **2. Action principles according to area**

The following is a description of the basic action principles of Acerinox and its Group concerning different aspects of corporate social responsibility and with its main stakeholders.

### **2.1. Basic action principles concerning sustainability.**

Sustainability is the fundamental principle that governs the Group's policies, strategies and operations. Its fundamental action principles are implemented as part of the Sustainability Policy and are summarised below:

- a) Establish instruments to reinforce the competitiveness of manufactured products through efficiency in manufacturing, transportation and distribution processes.
- b) Create value for shareholders, clients, and suppliers by ensuring that business profits represent one of the pillars of sustainability for the future of the Company and the Group.
- c) Boost the sustainable use of resources and the protection of biodiversity, as well as contribute in the fight against climate change by promoting the minimization of impacts originating through Group activities, encouraging respect of the environment and procuring precise information and training in order to do so.

## 2.2. Basic action principles concerning transparency.

Transparency is fundamental in transmitting trust and credibility to both the markets and investors, as well as to employees and the remaining stakeholders. Acerinox agrees to:

- a) Distribute relevant and trustworthy information regarding the Group's performance and activities.
- b) Encourage transparency by assuming the commitment to prepare and regularly publish financial and non-financial information about its activities, following one of the generally accepted methodologies for the latter.

The parent Company of the Group shall publish the following reports: the Annual Financial Report, the Annual Corporate Governance Report, the Sustainability Report, and the Annual Remunerations of Directors Report, as well as any other documentation or report required under current standards. Copies of the aforementioned documents shall always be available on the company website.

The presentation of results and informative meetings with analysts and investors shall be subject to dissemination through the company website. Furthermore, said page will re-broadcast live at the General Shareholders' Meeting.

## 2.3 Basic action principles concerning innovation and development.

The Company considers innovation to be a variable with strategic importance that benefits all the Group's businesses, as well as all of its activities:

- a) It will boost research & development, and innovation (R&D&i) activities aimed at efficiency in the continual optimisation of the Group's business operations, the management of its facilities and teams, the reduction of its operational and maintenance costs, the decrease in its environmental impact, and the development of new products and services that respond to the needs of its clients.
- b) It will endeavour to achieve innovations that encourage the sustainable development and efficient management of resources, and which contribute to the social and economic development of the areas where the Group performs its activities.
- c) It will endeavour to keep the Group at the forefront of new technologies.

## 2.4. Actions principles concerning responsible taxation.

The taxes paid by the Group in the countries and territories where it operates represent the main contribution of Group companies to the sustainment of public expenditure, and as such represent one of its key contributions to society.

The Group assumes the following commitments within the framework of what is established in the Corporate Tax Policy:

- a) Comply with all current legislation concerning tax matters in the different countries and territories where it operates.
- b) Adopt decisions regarding taxation matters based on a reasonable interpretation of the applicable standard.
- c) Not establish or acquire companies that are residents of tax havens, with the sole exception being those that limit themselves to selling their products in said territories.
- d) Not use opaque or contrived structures unrelated to the activities of the Group and whose only purpose is to reduce its tax burden. The Group specifically adopts the commitment to not perform transactions between bodies related exclusively by motivations to erode the tax bases or to transfer profits to territories with low rates of taxation.
- e) Maintain a good relationship with the authorities in matters to do with taxes based on trust, good faith, professionalism, collaboration, loyalty, and reciprocity. This is without prejudice to any legitimate disputes that, respecting the aforementioned principles and in defence of its own interests, may arise with said authorities regarding the application of standards.

The company's Tax Policy of the company is the subject of a separate document called "Tax Policy of Acerinox, S.A. and the Companies that make up its Group".

### **III.- Action principles concerning the main stakeholders**

#### **1. With shareholders and investors**

The shareholders and investors of Acerinox are the main stakeholders with which the Group has relations. The action principles that guide this relationship are the following:

- a) Shareholders must exercise their rights with the Company and other shareholders, and must in return perform their duties with loyalty, good faith and transparency within the framework of social interest and in compliance with the Company's corporate governance system.
- b) The Company must facilitate and promote the responsible exercise of its rights and compliance with its obligations towards its shareholders and the owners or rights or interests over shares subject to the principle of equal treatment.

- c) The Company must encourage the informed participation of shareholders at the General Shareholders' Meeting and must adopt timely measures in order to facilitate said General Shareholders' Meeting, effectively exercising its duties and terms of reference in accordance with the law and the system of corporate governance.

## **2. With the communities where the Group performs its activities**

Acerinox and its Group of companies are characterised by its international presence. During its operations it takes on the following action principles concerning the different territories and communities where it operates:

- a) Harmonize the Group's activities in the different countries where it operates, pursuant to the different social and cultural realities of these countries.
- b) Reinforce the relationships of trust with the different communities it interacts with through the support of the different Public Administrations and benchmark social organisations.
- c) Reinforce respect of the rights of disadvantaged ethnic and group minorities in all communities where the Group is present.

## **3. With the environment**

Acerinox aspires to continue being the leader of environmentally-friendly stainless steel manufacturers.

The fundamental action principles are:

- a) Preserve the biodiversity of ecosystems, landscapes, and species where the Group performs its activities.
- b) Prevent pollution by progressively integrating technologies that are more efficient and less intensive in terms of carbon emissions from its facilities.
- c) Optimize management of hazardous and non-hazardous waste through implemented systems that set targets and goals over, among other aspects, the reduction of waste, the promotion of good practices and the use of recycled materials.

## **4. With employees**

The relationship between the different companies that make up the Group and their employees shall pursue the following principles:

- a) Companies that belong to the Acerinox Group must respect the human and labour rights recognized under national and international legislation, and especially those that degrade the group of workers as a whole - rejecting child, forced, or mandatory labour- as well as the rights of all ethnic minorities in those places where it performs its activities, under the terms set out in the Policy regarding respect of all human rights.

- b) Companies that belong to the Acerinox Group must recruit, select, and retain talent within a favourable framework of labour relationships based on equal opportunities, non-discrimination, and the consideration of diversity in all its variables, facilitating integration measures for disadvantaged groups as well as ensuring a reconciliation between the personal and work lives of its employees.
- c) A fair remuneration policy shall favour the hiring of the best professionals and shall strengthen the Group's human resources.
- d) Training and qualification of its employees shall favour professional promotion and shall adapt human resources to a diverse and multicultural work environment.
- e) And above all else, the Companies that belong to the Group shall maintain and promote a safe and healthy work environment both at the workplace and within its catchment areas.

## **5. With clients**

Acerinox is aware of the importance of having clients that are satisfied with the products it sells and with the services it provides, and therefore assumes the following principles of action:

- a) Respect and comply with all standards that regulate the activities of communication and marketing, assuming the voluntary codes that give transparency and truthfulness to said actions.
- b) Pay special attention to the health and safety of its clients throughout the entire life-cycle of the products it sells by complying with all and any legislation applicable in each case.
- c) Adopt the instruments necessary to guarantee the confidentiality of its clients' information.
- d) Monitor the quality of the service provided to its clients through satisfaction surveys.

## **6. With suppliers**

The supply chain shall respect the principles of corporate social responsibility assumed by the Group. To do so:

- a) Responsible practices shall be adopted in the management of the supply chain.

- b) The companies of the Group shall check<sup>1</sup> that the supply chain complies with the principles and values set out in the Code of Good Practices regarding business ethics and transparent management, labour practices, health and safety, the environment, the quality and safety of the products and services, and shall introduce responsible practices within the value chain promoting strict respect of the human and labour rights recognised in national and international legislation in the performance of its activities.
- c) In the selection of suppliers they shall offer a competitive system under equal conditions, publishing all documents regarding conditions and other applicable standards for the contracting, as well as the usage procedures.

#### **IV.- Mechanisms for the implementation, monitoring and control of the Policy**

In accordance with its terms of reference, the Appointments, Remunerations and Corporate Governance Committee at Acerinox, S.A. shall monitor this policy and assess the level to which it is complied with.<sup>2</sup>

#### **V.- Circulation**

The Company shall publish this policy on its website.