



GENERAL POLICIES

Human Rights Policy of the Acerinox Group

February 26, 2025



HUMAN RIGHTS POLICY OF THE ACERINOX GROUP

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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 Human Rights Policy of the Acerinox Group (hereinafter, the “**Policy**”) is designed to affirm Acerinox and its Group entities' commitment to supporting, respecting, and protecting human rights as recognized in both national and international law.

This Policy is informed by the Code of Conduct and Good Practices of Acerinox, S.A. and its Group of companies, the General Sustainability Policy of the Acerinox Group, and particularly the Sustainability Due Diligence Policy of the Acerinox Group. It aligns with key international human rights standards, including the United Nations (hereinafter, the “**UN**”) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the principles of the UN Global Compact, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, as well as the conventions of the International Labor Organization, and the UN Sustainable Development Goals, along with related supporting documents and texts.

In compliance with sustainability due diligence obligations, the Acerinox Group is committed to implementing effective measures to identify and manage the risks and adverse impacts on human rights that may result from its products, services, and operations. This commitment also extends to its dealings with individuals or entities that have commercial relationships with the Acerinox Group (hereinafter, referred to as “**Business Partners**”) throughout its chain of activities (hereinafter, the “**Activity Chain**”).

Following this commitment, the Company's Board of Directors approved the Human Rights Policy of the Acerinox Group at its meeting on February 26, 2025.

II) SCOPE OF APPLICATION

This Policy applies to Acerinox and entities within the Acerinox Group (hereinafter, the “**Acerinox Group**” or the “**Group**”) and, as such, is applicable to all its directors, managers, and employees.

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 and its subsidiaries, the promotion of principles that

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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.

In implementing the principles of this Policy, Acerinox Group entities will engage constructively with groups related to their business activities. This includes investors and shareholders, employees and their representatives, the Business Partners in the Activity Chain, as well as national institutions of human rights and legitimate representatives of these individuals and groups (hereinafter, the “**Stakeholders**”).

III) GENERAL PRINCIPLES

To accomplish its stated objectives and commitments, the Group embraces and promotes the following general principles, which should guide its actions in all areas concerning human rights, and, where applicable, those of its Business Partners within the Activity Chain:

- a) Implement suitable human rights due diligence measures to identify and address actual and potential risks and adverse impacts that could arise from the activities of the Group and its Business Partners within the Activity Chain.
- b) Use the Group's internal control systems to regularly assess the effectiveness of its due diligence system, setting medium and long-term sustainability goals and tracking progress toward these objectives.
- c) Uphold the right to an adequate, healthy, and sustainable environment for all communities in which the Group operates, taking into account their expectations and needs.
- d) Foster a culture of respect for human rights by providing targeted training and communication initiatives to raise awareness among professionals in this field.
- e) Provide Stakeholders with free, accessible, and retaliation-free mechanisms for complaints, participation, and consultation. This allows them to communicate and engage in managing adverse human rights impacts resulting from the Group's activities.
- f) Take appropriate action if a human rights violation is detected in any facilities, centers, or locations where activities occur, and report it to the relevant authorities as required by applicable regulations.

IV) STATEMENTS

Building on the General Sustainability Policy of the Acerinox Group and the Sustainability Due Diligence Policy of the Acerinox Group, Acerinox, on behalf of itself and all entities within the Group:

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- a) Rejects child labor, forced or compulsory labor, and any form of modern slavery. “Child labor” refers to work that deprives children of their childhood, potential, and dignity, and harms their physical and psychological development; specifically, work that is dangerous and detrimental to a child's physical, mental, or moral well-being, and/or interferes with their education.
- b) Respects the rights to freedom of association and collective bargaining, as well as the free movement of people, in accordance with each country's laws.
- c) Provides competitive salaries to employees, in line with industry standards and the local market. The compensation policy is communicated to employees and meets minimum wage criteria to ensure a decent standard of living, while also adhering to limits on maximum overtime hours and necessary rest periods.
- d) Rejects unfair discrimination based on birth, race, religion, opinion, sexual or gender orientation or identity, age, or any other personal or social condition or circumstance, and actively promotes equal opportunities.
- e) Ensures a work environment free from violence, harassment (including mobbing), or any other intimidating behavior. Implements security services at each operational center as needed, based on assessments, to ensure employee well-being and facility safety.
- f) Promotes diversity and inclusion, recognizing these as beneficial for society, the company, and its employees.
- g) Honors the rights of vulnerable groups in the areas where it operates, including indigenous peoples, ethnic minorities, and disadvantaged groups.
- h) Acknowledges the vital role of the environment in safeguarding communities' fundamental rights, such as access to water and other ecosystem services.
- i) Protects the health and safety of its professionals by promoting training, awareness, and communication initiatives, while also implementing other measures aimed at safeguarding them.
- j) Rejects all forms of corruption and is dedicated to upholding ethical standards and legal compliance.
- k) Ensures confidentiality and privacy rights, adhering to privacy and data protection regulations, and implements necessary information security measures.
- l) Engages with Stakeholders on matters that may affect them and addresses their concerns regarding the operations of the Acerinox Group. Provides a confidential ethics channel for any interested party to report irregularities or behavior that contradicts the human rights principles and commitments of the Group, facilitating appropriate investigations and remedies as needed.

V) GOVERNANCE

The Governance foundations regarding sustainability, as outlined in the General Sustainability Policy of the Acerinox Group, form an integral part of this Policy.

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VI) 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.

VII) 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, as well as changes affecting the structure and activities of the Acerinox Group.

The Policy will enter into force upon approval by the Acerinox Board of Directors, although the Acerinox Group may adhere to timelines outlined in applicable regulations regarding the enforceability of obligations in this area.

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