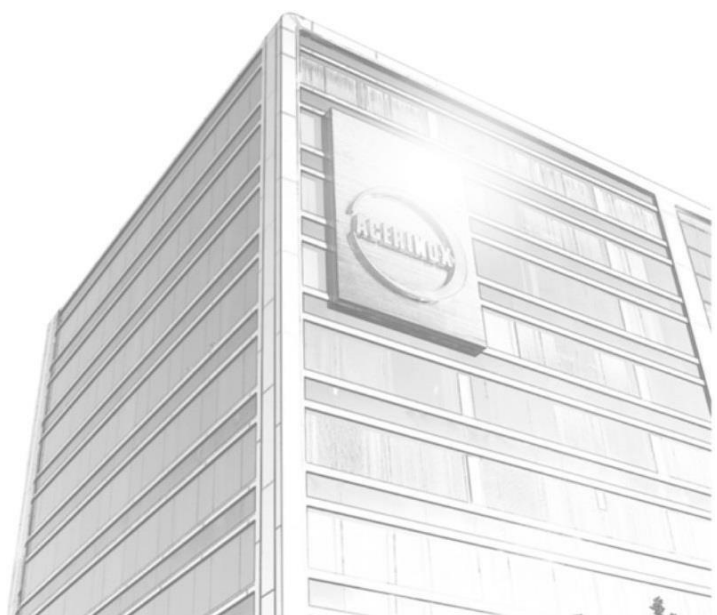




GENERAL POLICIES

Sustainability Due Diligence Policy of the Acerinox Group

February 26, 2025



SUSTAINABILITY DUE DILIGENCE POLICY OF THE ACERINOX GROUP

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SUSTAINABILITY DUE DILIGENCE POLICY OF THE ACERINOX GROUP

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. This policy (hereinafter, the “**Policy**”) aims to establish the due diligence principles that should guide the actions of the Acerinox Group concerning sustainability.

These principles consider the General Sustainability Policy of the Acerinox Group and the relevant national and international standards, practices, and recommendations related to sustainability and corporate due diligence in sustainability (hereinafter, “**Due Diligence**”). Among others, they include the Sustainable Development Goals (“**SDGs**”), the United Nations (hereinafter, the “**UN**”) Guiding Principles on Business and Human Rights, the Organization for Economic Co-operation and Development (hereinafter, the “**OECD**”) Guidelines for Multinational Enterprises on Responsible Business Conduct, the OECD Due Diligence Guidance for Responsible Business Conduct, and the International Labor Organization's Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, along with related supporting documents and texts.

The Policy is detailed and implemented through procedures, instructions, plans, and other internal regulations, and is aligned with various corporate regulations related to environmental and social areas. The Policy is also supported by the Company's corporate governance system, which includes the Code of Conduct and Good Practices of Acerinox, S.A. and its Group of companies, as well as the General Risk Control and Management Policy of Acerinox, S.A. and its Group of companies.

In accordance with the foregoing, the Company's Board of Directors approved this Policy at its meeting on February 26, 2025.

II) SCOPE OF APPLICATION

This Policy applies to Acerinox and the entities within the Acerinox Group (hereinafter, the “**Acerinox Group**” or the “**Group**”).

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.

For entities not controlled by Acerinox or its subsidiaries, the promotion of principles that 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

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a management role.

The Policy applies to the directors, senior managers and employees, and workers' representatives of the Acerinox Group, as well as individuals or legal entities engaged in commercial relationships with the Acerinox Group (hereinafter, the “**Business Partners**”) across its chain of activities (hereinafter, the “**Activity Chain**”).

In its application, consideration is also given to the various groups, communities, or entities whose rights or interests could be affected by the products, services, and operations of the Company, its subsidiaries, and/or its Business Partners. This includes national environmental and human rights institutions, civil society organizations focused on environmental protection, and legitimate representatives of these individuals, groups, communities, or entities (hereinafter, the “**Stakeholders**”).

III) GENERAL PRINCIPLES

The Due Diligence approach aims to reduce the probability and exposure of the Group to risks and impacts and to seize opportunities that impact sustainable value creation.

The Group takes on and promotes the following principles that must govern its actions:

- a) **Understand Due Diligence as a continuous, dynamic process** to identify and manage risks and adverse human rights and environmental impacts related to the Group's business activity and its Business Partners in the Activity Chain.
- b) **Address issues on Due Diligence matters with suitable** measures proportional to the severity and likelihood of the actual or potential risks and adverse effects. When necessary, due to the nature of the situation or required measures, the adoption of preventive or corrective action plans is included. These plans take into consideration the extent of the Company's or its subsidiaries' involvement and, where applicable, their ability to influence the Business Partner.
- c) **Integrate Due Diligence** into management systems and procedures, promoting alignment between the different internal departments.
- d) **Repair any actual adverse effects** caused by the Company or its subsidiaries through the implementation of remediation measures proportional to the Acerinox Group's degree of involvement in producing the adverse impact.
- e) Collaborate, where necessary, with the **Business Partners in the Activity Chain** to improve the effectiveness of implemented preventive or corrective action plans.

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- f) **Establish free, accessible, and non-retaliatory complaint, participation, and consultation mechanisms** for Stakeholders to communicate and participate in the management of adverse effects.
- g) **Disclose and publicly report** information on Due Diligence processes and measures taken to identify and manage actual or potential adverse effects, including findings and outcomes.
- h) **Periodically review and, when necessary, update risk management policies and systems** to align with the outcomes of Due Diligence procedures.
- i) **Promote training initiatives** for those working within the Group's companies and, when applicable, for Business Partners. These initiatives aim to inform about the real or potential adverse effects associated with the activities of the Group and its Business Partners throughout the Activity Chain and to develop the necessary skills for their prevention, management, and mitigation.

In applying and developing these Due Diligence principles, Acerinox and its subsidiaries will ensure that all interactions with Stakeholders comply fully with privacy and data protection regulations, while also implementing the necessary information security measures.

IV) BUSINESS PARTNERS AND ACTIVITY CHAIN

Managing a sustainable Activity Chain is a priority for the Acerinox Group, reflecting its strong commitment to consistently conveying the Group's quality, efficiency, and innovation to its Business Partners, along with principles of ethics, integrity, compliance, transparency, and overall sustainability.

To achieve these objectives, measures are put in place to enhance the effectiveness of this Policy's Principles, including:

- a) **Incorporate Due Diligence pre-qualification processes** in the selection procedures for Business Partners, tailoring them, when necessary, to the specific risks and context related to the business relationships, activity areas, or geographical locations of the Business Partners.
- b) **Obtain contractual guarantees from direct Business Partners** to demonstrate their compliance with the Code of Conduct for Business Partners of the Acerinox Group or the principles of the Policy; additionally, ensure these commitments are passed on to the individuals or legal entities with whom they have commercial agreements and who are part of the Acerinox Group's Activity Chain.
- c) **Oversee the fulfillment** of obligations and commitments made by the Business Partners **throughout the contract term** through verification activities, such as internal and/or external audits. This responsibility does

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not exempt the Business Partners from promptly reporting any relevant information regarding actual or potential adverse effects.

If we identify adverse effects, either real or potential, during these verification activities or through other means, we will assess the need to implement corrective actions. Failing to comply with these actions may ultimately lead to the suspension or termination of the contract.

If an adverse effect is caused solely by the Business Partners within their Activity Chain, the Company and the Group will not be held responsible.

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.

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 in sustainability, 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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