



# Public Country by Country Report

Fiscal Year 2025



## Introduction

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This public country-by-country report has been prepared in accordance with the applicable regulations, with the aim of providing a transparent view of the activity and tax contribution of the Acerinox Group across the various jurisdictions in which it operates. However, for a proper interpretation, it is important to consider certain characteristics of the figures included:

- **Corporate Income Tax Paid (Cash Basis):** This item reflects the actual cash outflows effectively made during the fiscal year in respect of taxes. It must be emphasized that there is no direct correlation between this figure and the profit before tax of the current year.

The amounts reported generally derive from the settlement of prior fiscal years or instalment payments based on past results and may also include payments resulting from tax audits and/or litigation. Therefore, this figure should be analysed from a liquidity and compliance perspective with respect to prior obligations, rather than as an indicator of the tax profitability of the year under review.

- **Corporate Income Tax Accrued (Current Year):** This represents the current tax charge attributable exclusively to operations of the current financial year. This item does not include movements in deferred taxes (deferred tax assets and liabilities arising from temporary differences). Consequently, it is not possible to calculate the effective tax rate (ETR) under the OECD Pillar II Safe Harbour on a jurisdictional basis using this data.

In order to determine such ETR under the simplified Safe Harbour tests of the OECD and Spanish regulations, the ratio between income taxes (or analogous taxes) recognised as an expense in the profit and loss account and the profit before tax is used. The income tax expense recognised in profit and loss includes both current and deferred tax; however, as indicated, deferred taxes are excluded from the calculation of the Corporate Income Tax Accrued in the public country-by-country report.

Furthermore, it should be noted that differences between Corporate Income Tax accrued and actually paid in a given financial year mainly arise from the different timing and accounting nature of both concepts. Accrued tax reflects the current tax expense associated with the results of the year, under the accrual accounting principle, whereas tax paid reflects cash payments made during the period, which may relate to the current year, prior-year adjustments, or prepayments for future periods.

In this regard, divergences may be explained by (i) the timing of instalment payments and final settlements, (ii) adjustments resulting from tax audits or mutual agreement procedures, (iii) the utilisation or generation of tax credits (e.g., loss carryforwards or tax credits), and (iv) effects derived from withholding taxes or taxes paid in other jurisdictions. Therefore, these differences do not necessarily reflect inconsistencies in the Group's effective taxation, but rather timing mismatches inherent to the application of tax and accounting rules across jurisdictions.

These differences explain why, in jurisdictions such as Portugal, Poland or France, the Group reports positive tax payments for the year despite having recorded low results in financial year 2025.

- **Accumulated Earnings:** This concept represents the accumulated historical profits of the Group's entities that have been accumulated as part of equity and not distributed as dividends.

It is essential to distinguish this figure from both the profit of the current year and cash position. Accumulated earnings do not represent available cash, but rather capital that has already been reinvested in the Group's asset structure (machinery, facilities, inventories, etc.).



- **Profit (Loss) Before Income Tax or Taxes of a Similar Nature:** This concept reflects the result before tax, excluding dividends received from related entities, as well as impairments of intragroup participation. That said, although profit before tax is the starting point for tax calculation, it does not constitute the final tax base.

This is because accounting and tax regulations pursue different objectives, requiring technical reconciliation. To determine the Corporate Income Tax base, so-called 'extra-accounting' adjustments (both positive and negative) are applied. As a result, the final tax burden depends on this adjusted amount rather than on the initial accounting profit, which explains why both figures may differ significantly.

Regarding the Group's results in 2025, during that year the European market faced persistently weak demand and high global macroeconomic uncertainty. At the same time, protectionist measures applied by other countries, particularly the United States, led to a 25% increase in stainless steel imports into Europe compared to the previous year, resulting in very tight margins across the European continent.

That said, the following information should be highlighted regarding the published data in certain jurisdictions:

### **Germany**

The amounts recorded as Corporate Income Tax paid do not correspond to the tax charge of the current year but derive from settlements linked to the positive results obtained in fiscal year 2023 and to instalment payments for the year. The high level of payments reflects the strong profitability base of the entity in those periods.

The difference between accounting results and current tax arises from the use of different accounting frameworks: while taxation is calculated under local GAAP, the financial result is prepared under IFRS.

### **Spain**

The Group in this jurisdiction recorded negative results due to the exceptional circumstances described in the Annual Report.

Furthermore, in financial year 2025, following the declaration of unconstitutionality of Royal Decree-Law 3/2016, a refund of undue payments was obtained corresponding to the regularisation of Corporate Income Tax for fiscal year 2021, which explains why the tax paid in the year results in a refund.

This same adjustment also led to a lower tax expense being recognised, meaning that the recorded tax expense is linked to fiscal year 2021 and not to 2025.

### **Luxembourg**

The presence in Luxembourg is related to the development of insurance and reinsurance activities for the Group. Under this operating model, which is common in the international insurance sector, the entity manages policies, risks and technical obligations through outsourced professional managers and specialised external service providers. Therefore, income generation derives directly from asset management and the assumption of technical risks, without requiring a direct workforce structure for its operations and regulatory compliance.

### **Poland**

It is important to recall that accounting profit does not necessarily coincide with the taxable base used for tax purposes. In this jurisdiction, accounting results have been significantly impacted by large temporary adjustments, notably unrealised foreign exchange differences and adjustments arising from net realisable value



of inventories (both relating to non-taxable profits in the year), resulting in a negative taxable base for the current year, regardless of the profit reported in the accounts.

Overall, the analysis of the information included in this report requires a global perspective that takes into account the differences between accounting and tax rules, as well as the timing effects inherent to international operations. The Acerinox Group reiterates its commitment to strict compliance with tax obligations in all jurisdictions in which it operates, as well as to the principles of transparency and consistency in its tax contribution.



## Section 1. General Information

Name of the ultimate parent of the group / of the standalone undertaking	Acerinox, S.A.
Country where the ultimate parent has its registered office	The Kingdom of Spain
Financial Year - start date	1/1/2025
Financial Year - end date	12/31/2025
Reporting currency	EUR
Language of report	English - en

## Section 2. Overview of information on a country-by-country basis

Tax jurisdiction	Country code	Revenues	Profit (loss) before income tax	Income tax paid - on cash basis	Income tax accrued - current year	Accumulated earnings	Number of employees
Spain	ES	1,459,887,000	(280,884,000)	(1,545,000)	(2,008,000)	406,551,000	2,618
Portugal	PT	32,652,000	48,000	200,000	48,000	1,581,000	26
France	FR	58,731,000	898,000	733,000	305,000	9,036,000	33
Germany	DE	1,583,193,000	(9,496,000)	46,336,000	12,930,000	424,149,000	1,826
Italy	IT	87,521,000	3,635,000	1,172,000	611,000	8,275,000	47
Sweden	SE	96,040,000	(201,000)	0	0	3,176,000	26
Poland	PL	49,806,000	759,000	369,000	0	2,240,000	28
Belgium	BE	589,000	91,000	68,000	25,000	576,000	3
Luxembourg	LU	5,548,000	(16,000)	206,000	(1,000)	1,078,000	0
Austria	AT	2,812,000	2,179,000	375,000	500,000	1,886,000	4
Netherlands	NL	1,390,000	356,000	149,000	78,000	450,000	4
Turkey	TR	302,000	232,000	65,000	61,000	553,000	4
<b>All other tax jurisdictions (aggregated basis)</b>							
		4,127,113,000	382,302,000	112,423,000	113,288,000	942,588,000	4,549



## Section 3. List of subsidiaries and activities

Member State or tax jurisdiction	Country code	Name of each subsidiary undertaking in the Member State or tax jurisdiction	Brief description of the nature of activities in the Member State or tax jurisdiction
Spain	ES	Acerinox, S.A. Acerinox Europa, S.A.U. Roldan, S.A. Inoxfil, S.A. Metalinox Bilbao, S.A.U. Inoxidables de Euskadi, S.A.U. Inoxcenter, S.L.U. Inoxcenter Canarias, S.L.U.	Manufacturing and commercialization of flat and long stainless steel products. Research and development. The parent company of the group performs the functions typical of a holding entity: developing Group policies and financial strategy, designing investment and environmental policies, defining the R&D strategy, as well as administrative services (accounting, legal, and advisory).
Portugal	PT	Acerol - Comércio e indústria de aços inoxidáveis, unipessoal, Lda. Inoxplate - Comércio de productos de aços inoxidável, unipessoal, Lda.	Commercialization of stainless steel products and others (leasing services).
France	FR	Acerinox France, S.A.S. VDM Metals France S.A.S. HAYNES INTERNATIONAL SARL	Commercialization of stainless steel and high-performance alloys products.
Germany	DE	Acerinox Deutschland, GmbH VDM Metals Holding GmbH VDM Metals GmbH VDM Metals International GmbH	Manufacturing and commercialization of high-performance alloys. Research and development. Commercialization of stainless steel products. Services typical of a sub-holding activity: holding of shares or other equity instruments.
Italy	IT	Acerinox Italia, S.r.l. VDM Metals Italia S.r.l. HAYNES INTERNATIONAL S.r.l.	Commercialization of stainless steel and high-performance alloys products.
Sweden	SE	Acerinox Scandinavia, AB	Commercialization of stainless steel products.
Poland	PL	Acerinox Polska, SP Z.O.O	Commercialization of stainless steel products.
Belgium	BE	Acerinox Benelux S.A - N.V.	Commercialization of stainless steel products.
Luxembourg	LU	Inox Re S.A.	Insurance
Austria	AT	VDM Metals Austria G.m.b.H.	Commercialization of high-performance alloys products.
Netherlands	NL	VDM Metals Benelux B.V.	Commercialization of high-performance alloys products.
Turkey	TR	Metal Sanayii ve Tikaret L.S.	Commercialization of stainless steel products



## Section 4. Omitted information

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Information omitted (if any) for this financial year	Information omitted (if any) for this financial year, other tax jurisdiction	Explanation of reason for omission of information
Information omitted in previous financial years, which is disclosed in this financial year (if any)		

## Section 5. Explanations for material discrepancies between income tax paid and accrued

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Explanation of any significant discrepancy between corporate income tax paid and accrued.