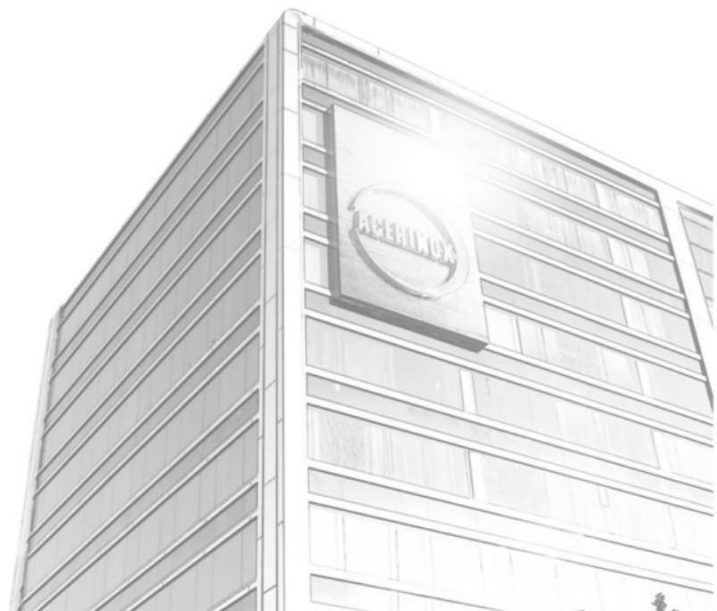




Personal Data Protection Policy of the Acerinox Group

December 18, 2024



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I. Introduction

1. The Personal Data Protection Policy (hereinafter, also referred to, indistinctly, as the “Policy”) has been approved by the Board of Directors of Acerinox, S.A. (hereinafter, “Acerinox”), in accordance with the non-delegable power of the Board of Directors to determine the general policies and strategies of Acerinox and its Group, as provided for under Sections 249 *bis* and 529 *ter* of the recast text of the Corporate Enterprises Act, approved by Royal Legislative Decree 1/2010, of July 2.
2. This Policy sets out, endorses and promotes the development and implementation of two significantly important strategic objectives that govern and inspire the activities of Acerinox, the parent company of the Group (hereinafter, the “Acerinox Group”, the “Group” or the “Organization”) within the different jurisdictions in which it operates, namely:
 - The commitment toward the constant development of a general data protection and privacy framework that sets out and promotes all of the efforts that the Acerinox Group carries out in pursuit of the due compliance with the legal data protection and privacy regulations applicable to its activities, which are implemented through the different procedures, instructions, controls and other internal guidelines, as appropriate.
 - The upmost standards of compliance with regard to applicable data protection regulations and respect for the fundamental right to privacy of all natural persons whose personal data is processed by the Acerinox Group, as well as the prevention of any liability that may result from any breach or non-compliance with applicable data protection regulations, taking into account the different jurisdictions in which the Acerinox Group operates.
3. The terms and provisions of this Policy harmonize and incorporate all of the requirements and obligations established pursuant to Regulation (EU) 2016/679, of the European Parliament and of the Council, of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter, the “Regulation”), as well as the Data Protection and Digital Rights Act 3/2018, of December 5 (hereinafter, the “LOPDGDD”), together with the principles and standards set out in the different data protection regulations, in light of the countries in which the Group operates. Thus, this Policy is configured, furthermore, as a benchmark for the implementation and development of the essential elements and requirements set out both in the aforementioned regulations as well as in the criteria and different pronouncements issued by competent authorities, with implications and application for the Acerinox Group itself.

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4. This Policy sets out the principles, obligations and commitments that together configure and define personal data protection, and its purpose is to establish the guidelines and criteria that the Acerinox Group must take into consideration and apply in relation to the different personal data processing activities carried out by the Group.
5. All workers and directors of the Acerinox Group are required to respect the rights and freedoms of all individuals whose data is or may be processed in the performance of their duties, regardless of whether they are employees, candidates, contacts, suppliers, or customers, as well as any other third party whose information is the subject of any data processing.
6. Personal data processing carried out by the workers and directors of the Acerinox Group will be conducted while ensuring the confidentiality, security, and integrity of the data, in accordance with the principles of lawfulness, fairness and transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality.
7. Furthermore, this Policy serves as a guiding framework for the subsequent implementation and development thereof in data protection procedures, instructions, controls, or other internal guidelines that govern obligations, requirements, and specific issues required pursuant to applicable regulations and by competent supervisory authorities (such as the Spanish Data Protection Agency or the European Data Protection Board). Moreover, the purpose of this Policy is to serve as a reference document upon which the data protection system of the Acerinox Group will be based.
8. For the purposes of this Policy, the term “Members of the Organization” shall refer to the members of the governing bodies of the entities that conform the Acerinox Group, members of senior management, directors, employees, temporary workers or employees or workers subject to collaboration agreements, volunteers of the Organization, and all other individuals under the hierarchical supervision of any of the foregoing.
9. Furthermore, the term “Business Partner” shall refer to any individual or legal entity, except for the Members of the Organization, with whom the Organization has established or expects to establish any type of business relationship. By way of example, however not limited to, the foregoing term includes customers, suppliers, intermediaries such as external collaborators or sales prospecting staff, external advisors, or individuals or legal entities contracted by the Acerinox Group for the delivery of goods or the provision of services.

II. Principles

1. The safeguard regarding personal data protection constitutes an essential element for establishing a true ethical and compliance culture within organizations. The adequate business performance of Acerinox and its Group in this regard, as well as the trust and confidence that they generate, largely

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depend on this data protection culture, which will be set out both in this Policy as well as in any other procedures, instructions, controls, or other internal guidelines established pursuant to this Policy.

2. In line with the foregoing purpose, the essential regulatory compliance principles that underpin and support this Policy are set out hereinbelow:
 - Scrupulous respect for the fundamental right to privacy, as well as the basic principles in relation thereto.
 - Strict compliance with all data protection legislation and regulations applicable to the Acerinox Group and each of the entities that comprise the Group.
 - Consistency between the activities carried out by the Acerinox Group, and the conduct of its members, with the Group's objectives and the ethical culture it promotes.
 - Continuous improvement through the development and review of this Policy as well as any other procedures, instructions, controls, or other internal guidelines that complement this Policy, thereby adapting all of the foregoing to any legislative amendments that take place, as well as to the criteria and legal doctrine established by competent authorities from time to time.
 - Training as well as the raising of awareness among all members of the Group in relation to their respective data protection obligations.

II. Scope

1. The Data Protection Policy addresses the identified risks that affect the activities of the Organization in relation to personal data processing, and accordingly this Policy is mandatorily applicable to all entities that form part of the Acerinox Group. The foregoing entities, in the respective jurisdictions in which they operate, will ratify and adhere to this Policy through their respective governing bodies and, therefore, this Policy will be applicable to all members of the Organization (hereinafter, "Group Members" or "Members of the Organization"), regardless of their position or geographical location, and all of the foregoing without prejudice to the specific regulations applicable in the countries where the Acerinox Group operates.
2. Furthermore, this Policy will also be valid and mandatorily applicable in relation to the activities carried out jointly with Business Partners with which the entities of the Acerinox Group operate, and that may represent data protection risks for the Organization, when said activities involve the processing of personal data.

IV. Data protection bodies

1. The principles of leadership, exemplarity, and commitment within the Acerinox Group play a fundamental role in the successful establishment and implementation of the Group's general data protection strategy.
2. The Board of Directors of Acerinox, through the CEO, has delegated upon the individuals and bodies that comprise the data protection system, and in particular, the Data Protection Officer of the Acerinox Group, the task of supervising and overseeing the necessary compliance with all applicable data protection regulations and data protection policies of the Acerinox Group, to ensure that all companies within the Group safeguard and uphold the necessary respect for individuals' privacy, as well as all of the requirements and obligations established under applicable legislation, guaranteeing their independence and operational efficacy.
3. The Data Protection Officer will be assisted by the individuals and areas the support of which is deemed essential in order to ensure compliance with applicable regulations and the fundamental rights of individuals, for example: the directors responsible for processes, information systems, corporate risks, the legal department, internal audits, and cybersecurity.
4. The data protection responsibilities and functions of all of the individuals and bodies that comprise the data protection system of the Acerinox Group will be set out and developed by way of the corresponding internal guidelines.

V. Data protection obligations

1. The applicable personal data protection regulations establish a series of different principles and obligations that all entities that process personal data, whether as a data controller or data processor, must comply with and adhere to. Hereinbelow, the main obligations will be generally outlined which must be complied with by all of the companies of the Acerinox Group, as well as their employees and directors, with the support and supervision of the Data Protection Officer, without prejudice to the subsequent development and implementation of said principles and obligations, in detail, by way of the corresponding procedures, instructions, controls, or other internal guidelines, as appropriate.
 - Adhere to the following basic data protection principles:
 - Lawfulness, fairness and transparency: data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.

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- Purpose limitation: data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
 - Data minimization: data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
 - Accuracy: data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
 - Storage limitation: data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
 - Integrity and confidentiality: data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.
 - Accountability: the Group must adopt the measures it deems necessary in order to carry out the data processing, in accordance with the scope of compliance provided for in applicable regulations.
- Comply with the duty of disclosure and transparency, thereby ensuring that all data subjects whose personal data is processed by any of the companies of the Acerinox Group are properly informed about the details of the data processing, in accordance with the regulatory requirements applicable in each of the respective countries in which the Group operates.
 - Carry out lawful data processing based upon a correct and appropriate legitimate basis.
 - Ensure the correct exercise of the rights of data subjects in relation to data protection.
 - Adopt the necessary measures to ensure that any third parties that process data on behalf of the Acerinox Group provide the necessary safeguards regarding regulatory compliance and the observance of individuals' rights.
 - Instruct and train the workers of the Acerinox Group companies on data protection, in accordance with the applicable regulations in each of the respective countries in which the Group operates.
 - Cooperate diligently with the competent supervisory authorities.
2. Develop and comply with the procedures, instructions, controls, or any other internal guidelines that may be necessary in relation to the due compliance with data protection regulations and the defense of the rights of individuals whose data is processed by the Acerinox Group.

VI. Consequences of breach

1. All persons to whom this Policy is applicable must mandatorily comply with the terms and provisions thereof. If any breach is identified, the Data Protection Officer must be notified as soon as the breach has been detected. Acting quickly in all aspects related to data protection is considered to be of utmost importance, in light of the short deadlines provided for under applicable regulations.
2. Any breach of this Policy will result in the adoption of the corresponding measures, as applicable.

VII. Publication

1. This Policy is hereby made available to all Members of the Organization, interested parties, Business Partners and third parties, by way of the publication thereof on the Organization's website (www.acerinox.com), as well as to any pertinent persons for the adequate defense of the Organization's interests.

Drafted by: Compliance Department

Reviewed by: Secretary General

Approved by: Board of Directors of Acerinox, S.A.

Date of approval: December 18, 2024

Date of most recently approved version: N.A.