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MADRID, MARCH 24, 2025

**OPERATING INSTRUCTIONS FOR  
THE ELECTRONIC SHAREHOLDER FORUM**

**2025 General  
Shareholders' Meeting**

# Table of contents

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<b>I. Introduction</b>	<b>3</b>
<b>II. Electronic forum concept</b>	<b>3</b>
<b>III. Purpose of the forum</b>	<b>3</b>
<b>IV. Forum access and use</b>	<b>4</b>
<b>V. Posting to the forum</b>	<b>4</b>
<b>VI. Personal data protection</b>	<b>5</b>
<b>VII. Absence of license</b>	<b>7</b>
<b>VIII. Cost of use</b>	<b>7</b>
<b>IX. Contact inbox</b>	<b>7</b>



# ACERINOX, S.A.

## OPERATING INSTRUCTIONS FOR THE ELECTRONIC SHAREHOLDER FORUM APPROVED BY THE BOARD OF DIRECTORS

### I. Introduction

Pursuant to the provisions of Article 539.2 of the recast text of the Spanish Corporate Enterprises Act, approved by Royal Legislative Decree 1/2010, of July 2 (hereinafter, the “LSC”), Acerinox, S.A. (hereinafter, “Acerinox” or the “Company”), has set up an Electronic Shareholder Forum on the Company’s website to hold its General Shareholders’ Meetings.

The Board of Directors of Acerinox, at its meeting held on March 24, 2025, approved this document, namely the “Operating instructions for the Electronic Shareholder Forum” (hereinafter, the “Operating Instructions”).

### II. Electronic forum concept

This is a space available on the Company’s website where, in accordance with the LSC, shareholders may publish proposals, accompanied by their contact details, to enable communication between shareholders.

The forum is not a mechanism for online digital conversation among shareholders, nor is it a place for virtual debate. Neither does the forum constitute a channel of communication between the Company and its shareholders.

### III. Purpose of the forum

The forum has been made available to facilitate communication between the shareholders of Acerinox (individuals, natural and legal persons, and any voluntary associations that may be formed) prior to the holding of the General Shareholders’ Meetings.

Shareholders may submit posts to the in the forum that, in accordance with the LSC, serve as:

- I. Publications of proposals intended for submission in addition to the agenda announced in the call notice.
- II. Requests for support for such proposals.
- III. Initiatives to reach a sufficient percentage to exercise a minority right outlined in law.
- IV. Offers or requests for voluntary representation.

## IV. Forum access and use

Access to and use of the forum is reserved exclusively to individual shareholders of ACERINOX that are registered in the corresponding account register and to voluntary associations of shareholders registered in the Register set up for this purpose by the Spanish National Securities Market Commission (CNMV).

To access the forum, shareholders and voluntary associations must sign up as registered users (hereinafter, a “Registered User”). To do so, they must access via:

- I. Electronic Spanish national ID (DNI); or
- II. A recognized electronic user certificate that is valid and in force and has not been revoked, in accordance with the applicable legislation, and issued by the Spanish Public Certification Authority (CERES), which is part of the Fábrica Nacional de Moneda y Timbre.

In the event that the shareholder cannot register as a Registered User in the ways mentioned hereinabove, the shareholder may complete the registration form for the Electronic Shareholder Forum. In this case, the shareholder must provide a nominative document showing the ownership of the shares and must verify their identity by means of a copy of the front of their Spanish national ID (DNI), copy of the front of their Spanish foreigner’s ID (NIE), identification page of their passport or equivalent identification document (and, in the case of a legal entity, a document of sufficient proof of representation).

In order to formally submit the application for Registered User status, the user must accept the Operating Instructions of the forum. Furthermore, the user must declare that they confirm the veracity of the information on share ownership in the Company as provided in the registration form. Finally, the shareholder must accept a clause regarding data protection.

The period of operation of the forum shall be from the date of publication of the call convening the General Shareholders’ Meeting until the date on which the meeting is held.

## V. Posting to the forum

Shareholders registered as users may submit communications relating to the matters indicated in section III. The Company’s administrator will post these to the forum.

Proposals published in the forum will include the following shareholder identification information (provided via the registered user form):

- name and surname/company name and identification of its representative, in the case of legal entities;
- number of shares owned; and
- contact information indicated by the shareholder via the form, in order to facilitate communication with other interested Registered Users.

Acerinox may decline to post to the forum or remove from it at any time communications that it considers to be non-compliant with applicable law and/or these Operating Instructions.

Posts containing comments that are disrespectful, offensive, xenophobic, racist, or violent, will not be posted to the forum, nor will any posts likely to break the law in any way or that are not suitable for the nature or scope of the forum in general.



Acerinox is not responsible for the accuracy, veracity, validity, legality, or relevance of forum posts. Likewise, Acerinox has the power, but not the obligation, to monitor the content of posts appearing in the forum; these are the sole responsibility of the Registered Users who post them.

No personal data or third-party information may be entered without the express and documented consent of the person concerned; impersonating others is also prohibited.

The publication of posts on the forum is conditional upon the user's maintaining their status at all times as a shareholder of Acerinox or as a voluntary association of shareholders duly constituted and registered in the CNMV. If Acerinox, in its capacity as the administrator of the forum, should at any time question the fulfillment of these conditions, it may require the user to provide accreditation of their continued status, being able to request any information or documentation deemed appropriate to verify the ends provided for here. Likewise, the Registered User accepts the obligation to provide the Company with extremely prompt notification of the loss of shareholder status, if applicable.

In no case may a post made or published via the forum be understood as a notification to Acerinox to exercise any shareholder rights, either individual or collective (adding agenda items, remote voting, etc.), nor does it supplement the requirements outlined in law, the Company's bylaws, or the Company's internal regulations for the exercise of any of the said rights or the performance of shareholders' initiatives and actions. All rights and powers that shareholders wish to exercise must be exercised through the legally established channels; the forum is not, under any circumstances, a valid channel for these purposes.

In order to exercise these rights, and for any other matters, shareholders may contact the Company through the Shareholders' Office, whose contact details appear on the Company's website.

After the conclusion of the General Shareholders' Meeting, Acerinox reserves the right to erase and delete all posts regarding said meeting.

## VI. Personal data protection

ASPECT	DETAILS
<b>Data Controller</b>	Acerinox, S.A.
<b>Purposes of the Data Processing</b>	<ul style="list-style-type: none"><li>• Management and supervision of the Electronic Forum.</li><li>• Management of the General Shareholders' Meetings of Acerinox.</li><li>• Carrying out statistical studies of the Company's shareholders.</li></ul>
<b>Lawful Basis for Processing</b>	<ul style="list-style-type: none"><li>• Execution of a contract (Art. 6.1.b GDPR) for the management of the Forum.</li><li>• Compliance with a legal obligation (Art. 6.1.c GDPR) for the management of the Meetings.</li><li>• Legitimate interest (Art. 6.1.f GDPR) for statistical studies.</li></ul>
<b>Categories of Data Processed</b>	<ul style="list-style-type: none"><li>• Identification data: name and surname, ID card or other identification document.</li><li>• Contact data (postal address, email, telephone)</li><li>• Number of shares.</li><li>• Connection data: IP address, date and time of access.</li></ul>



ASPECT	DETAILS
<b>Data Recipients</b>	<ul style="list-style-type: none"><li>• Competent authorities and public bodies, in compliance with legal obligations.</li><li>• Technology service providers acting as data processors.</li><li>• Other entities contracted for the operation of the Forum, acting as data processors.</li><li>• Other Registered Users of the Forum, to the extent necessary to facilitate communication between them within the framework of the purposes of the Forum.</li></ul>
<b>Storage Periods</b>	<ul style="list-style-type: none"><li>• Data for the management of the Forum: Duration of the Forum + legal limitation periods.</li><li>• Data for the management of Meetings: Periods established by commercial legislation.</li><li>• Data for statistical studies: Anonymized data once the General Shareholders' Meeting has ended.</li><li>• Data for inquiries and exercise of rights: Time necessary to process the request + legal limitation periods.</li></ul>
<b>International Transfers</b>	International transfers are not carried out.
<b>Automated Decisions</b>	No automated decisions are adopted, including profiling, with the personal data of Registered Users.
<b>Data Security</b>	Acerinox, S.A. has implemented the necessary technical and organizational security measures to guarantee a level of security appropriate to the risk, in accordance with Article 32 of the GDPR. More details in the company's Information Security Policy.
<b>Exercise of Rights</b>	Registered Users may exercise their rights of access, rectification, opposition, erasure, portability and restriction of processing, and may contact the Acerinox Data Protection Officer for this purpose at Madrid, 28035, calle de Santiago de Compostela nº 100, or by email at <a href="mailto:dpo@acerinox.com">dpo@acerinox.com</a> indicating which right they wish to exercise. Likewise, if they do not obtain satisfaction in the exercise of their rights, they may file a complaint with the Spanish Data Protection Agency through the website <a href="http://www.aepd.es">www.aepd.es</a>
<b>Additional Information</b>	For more detailed information on the processing of personal data, the complete Privacy Policy of Acerinox, S.A. can be consulted at <a href="https://www.acerinox.com/export/sites/acerinox/es/accionistas-e-inversores/gobierno-corporativo/galleries/Politiclas-Generales-Gobernanza/Personal-Data-Protection-Policy-of-the-Acerinox-Group.pdf">https://www.acerinox.com/export/sites/acerinox/es/accionistas-e-inversores/gobierno-corporativo/galleries/Politiclas-Generales-Gobernanza/Personal-Data-Protection-Policy-of-the-Acerinox-Group.pdf</a>



## VII. Absence of license

Acerinox authorizes the registered users to make use of the intellectual and industrial property rights related to the software installed on the server of Acerinox, or a third party that provides the services comprising the forum, exclusively for the purposes set forth in section III above (Purpose of the forum) and according to the provisions of these Operating Instructions. The registered user shall refrain from obtaining, or attempting to obtain, access to and use of the forum and its contents by means or procedures other than those which have been made available or indicated for that purpose in each case.

Acerinox does not grant any type of license or usage authorization of any kind for its intellectual and industrial property rights or for any other forum-related property or right other than that provided for in the preceding paragraph.

## VIII. Cost of use

Access to and use of the forum by registered users is free of charge, except for the cost of connection through the telecommunications network offered by the access provider contracted by each registered user.

## IX. Contact inbox

Registered users who have suggestions or proposals for improving the forum, who require technical assistance, who wish to report content that does not comply with these Operating Instructions or who wish to exercise their rights under personal data protection law may contact the Company's email address ([dpo@acerinox.com](mailto:dpo@acerinox.com)), which will be provided for this purpose on the forum. The purpose of this inbox is to provide service to registered users and to improve the quality of the forum, without implying any administrative monitoring or liability.

Madrid, March 24, 2025



