

## SUSTAINABILITY FRAMEWORK POLICY

The Board of Directors of Barna Steel, S.A., on behalf of the entire Celsa Group ('**Celsa Group**' or the '**Company**'), in the context of its general and non-delegable power to determine the general policies and strategies of the Company, has approved this *Sustainability Framework Policy* (the '**Policy**').

### I. Purpose

This Policy establishes the general principles and objectives that make up the Celsa Group's sustainability strategy, with the aim of carrying out all its activities to promote the creation of long-term value for both the Company and its stakeholders, thus promoting the achievement of the Sustainable Development Goals (SDGs) approved by the World Organization of the United Nations.

The Celsa Group's sustainable development strategy is based on three fundamental pillars: environmental, social, and corporate governance aspects. Celsa Group's principles and objectives in these three pillars are developed in the corporate policies which, together with the Governance and Sustainability System, are a fundamental part of Celsa Group's identity and bring life to the Company's Purpose, as expressed in its Code of Ethics and Professional Conduct: '*We give infinite lives to finite resources*'.

Thus, this Policy contains the framework within which Celsa Group develops and implements Sustainability, being the reference and guide for the different sustainable development policies, where the principles and objectives are broken down and specified.

## **II. Scope**

This Policy applies to Celsa Group and all group companies, taking into account their specific characteristics. Celsa Group will work to ensure that the policies of its Group companies are in line with this Policy.

## **III. General principles**

Celsa Group's sustainable development strategy pursues the creation of sustainable value in carrying out its activity and ensures the achievement of the following general principles:

- Strict compliance with legal obligations and the main recommendations and guidelines on Sustainability, such as the principles of the SDGs, the commitments of the Paris Agreement, the United Nations (UN) Guiding Principles on Business and Human Rights, as well as other international instruments, especially in the areas of good human and labour rights practices, environmental protection, and anti-corruption.
- Align Celsa Group's corporate governance model with international and national good governance recommendations.
- Ensure compliance with Celsa Group's Purpose, Mission, Values and Vision, Code of Ethics and Professional Conduct, and its adaptation to the principles of Sustainability.
- Promote the identification of Celsa Group as a sustainable company and in continuous improvement of its behaviour towards society.
- Carry out Celsa Group's activity maximising the creation of value and competitiveness in a sustainable, innovative and efficient manner and ensuring that business approaches are long-term.
- Promote the circular economy and circular consumption.
- Foster diversity, equality, and the work-life balance of our professionals.
- Minimise negative impacts on the environments and communities in which Celsa Group operates.
- Maintain responsible management of the Celsa Group's value chain, and involving our suppliers, providers, and collaborators in the achievement of our environmental, social and economic commitments.

- Promote any policy that develops the areas of Sustainability, and promote the updating, supervision and effective monitoring of their compliance.
- Establish and maintain the relevant systems and procedures for the proper management and implementation of this Policy.

Based on these general principles, Celsa Group assumes the responsibility to promote economic, social, and environmental sustainability, as well as corporate sustainability, contributing on improving the environment in which it operates.

#### **IV. Competent organic structure for sustainability**

The following Celsa Group bodies are involved, according to their competencies, in the following functions and responsibilities:

- a) The Board of Directors of Celsa Group, as the body responsible for determining the corporate strategy in environmental, sustainability and corporate governance matters and approving the corporate policies of Celsa Group.
- b) The Group's Steering Committee, led by the Group's CEO, reviews at each meeting the main advances in the development of the Group's sustainability strategy and its integration into the overall business strategy.
- c) The Group's Executive Committee, led by the Group's Chief Operating Officer (COO), reviews, once a month, all the developments in all the sustainability areas of the Group.
- d) The position of the Chief Sustainability Officer consists of creating, defining, and driving the Celsa Group's sustainability strategy so that our activity benefits the resources and environments of the planet and society. The CSO's duties include: ensuring compliance with sustainability's best practice standards; organising and prioritising sustainability actions; providing the Executive Committee with input on the sustainability's application best practices and helping the committee to apply the most appropriate; and creating the necessary measures to minimise and neutralise the impact of our activity on the planet and society resources.
- e) Sustainability Executive Committee (SEC): Committee responsible for promoting sustainability, proposing new corporate policies and objectives, reporting on the evolution

of sustainability initiatives, contributing to the definition and implementation of the Celsa Net Positive Plan, reviewing the Environmental, Social & Governance (ESG) balance sheet, as well as promoting the alignment of strategic guidelines and team cohesion. The SEC is composed by the sustainability managers of the business units, the supply chain managers, and a representative of the people, the organisation and development department, and the corporate sustainability team.

- f) Business Unit Sustainability Committee (BU SEC): For each Business Unit, there is a SEC. Their task is to monitor sustainability issues more closely, with a focus on the environment, and to analyse risk points and solutions. These committees are composed of the Head of Sustainability, the environmental manager, the plant manager, the institutional relations manager (if any) and the Chief Executive Officer (CEO) (as a guest).

## **V. Sustainability objectives**

To achieve the general principles mentioned above of sustainable development, Celsa Group has set the following objectives:

- To adopt innovative and sustainable management, developing professional relationships based on diversity, inclusion and a sense of belonging, equal opportunities and non-discrimination in people management, productivity, profitability, efficiency, and sustainability.
- To operate on the basis of responsible management of the risks and opportunities derived from the evolution of the environment, maximising the positive impacts of our activities in the different territories in which we operate and minimising, as far as possible, the negative impacts, focusing on medium and long-term business approaches.
- To foster an ethical business culture, transparency, and trust with stakeholders, working together with the different stakeholders, promoting bilateral and fluid communication on the Celsa Group's business activity regarding sustainability.
- To contribute on the recognition of Celsa Group in the achievement of its strategic sustainable objectives and the continuous improvement of its reputation.

Based on these objectives, Celsa Group demonstrates its public commitment, at the highest level, to assume its responsibility to promote economic, social, and environmental sustainability, contributing on improving the environment, society, and the future.

## **VI. Areas included by Celsa Group in Sustainability**

For Celsa Group, the areas comprising Sustainability are:

- a) Human rights: to respect, promote, and demand respect for internationally recognised human rights, in accordance with our Human Rights Policy, committing ourselves to control and monitor compliance in relation to those who work in and on behalf of the Celsa Group, promoting initiatives and action plans that protect human rights and have a positive and sustainable social impact.
- b) Occupational health and safety: considering health and safety as our first priority and promoting a safe and healthy working environment for everyone who works in our centres, favouring their overall well-being, avoiding the risks that may arise in the performance of their duties, all in accordance with our Occupational Health and Safety Policy.
- c) Corporate governance and regulatory compliance: acting at all times in accordance with our Code of Ethics and Professional Conduct and in accordance with the legislation in force in the countries and territories in which we operate, adopting the best practices in corporate governance at national and international level, maintaining an adequate system of regulatory compliance, keeping an open dialogue with our stakeholders through appropriate and accessible channels, and committing ourselves to the economic, environmental, and social development of the regions in which we operate, as well as to responsible taxation.
- d) Quality: ensuring the safety and quality of the products and services we offer by involving our value chain in the Celsa Group Sustainability objectives and requiring due diligence of our supply chain in respecting and complying with the principles set out in our Code of Ethics and Professional Conduct, in accordance with our Supply Chain Policy.
- e) Environment: on one hand, to promote the protection of the environment and the responsible and efficient use of natural resources, promoting a greater use of renewable

energies and carrying out sustainable management of water--an essential resource in Celsa Group's processes, always taking into account its scarcity and value for our society, all within the framework of the Environment and Resource Management Policy; and on the other hand, to develop a strategy against climate change within the framework of the Climate Action Policy. All this is done by promoting participation in national and international projects and initiatives relevant to our activity in the field of sustainable development.

- f) Recycling and waste management: promoting the implementation of the waste hierarchy, so that the following management processes are favoured: prevention, minimisation, reuse, recovery, recycling, energy recovery, and leaving landfills as a residual management method.
- g) Diversity and inclusion: fostering a culture of respect for diversity in all its manifestations and variables and inclusion in the workplace, promoting a diverse and inclusive working environment that contributes to the achievement of corporate objectives and improved business performance, combating discrimination and inequality in any of its manifestations in the territories and communities where the Celsa Group operates. It is also important to promote the training and qualification of the team with equal opportunities, favouring personal and professional promotion, and facilitating the reconciliation of personal and professional life. All criteria are within the Equality, Diversity and Inclusion Policy, the Talent Management Policy, and the Occupational Health and Safety Policy.
- h) Innovation: supporting innovation as a fundamental and strategic pillar to achieve the economic, social, and environmental sustainability of the Celsa Group and its value chain, in accordance with the Innovation Policy.

## **VII. Sustainability Partnerships**

Celsa Group adheres, among others, to the following initiatives and associations that promote its commitment to sustainability objectives and enables analysis and improvement of sustainability management at Celsa Group level:

- UN Global Compact: an initiative that provides a practical framework to drive business sustainability.

- *Forética*: a leading organisation in sustainability and corporate social responsibility in Spain.
- *Platform for Accelerating the Circular Economy* (PACE), a platform that brings together business, government, and civil society leaders to develop a collective circular economy agenda and drive ambitious actions.
- *Fundación Empresa & Clima*: a non-profit organisation that works for business leadership and commitment in the fight against climate change.
- *Waste cluster of the Agència de Residus de Catalunya*: with the aim of contributing to its empowerment to boost the competitiveness of companies in the waste sector, strengthen their internationalisation, and promote innovation and research in this field.
- *The Carbon Disclosure Project*: A global organisation that works with shareholders and corporations to disclose the performance of large companies in relation to their greenhouse gas emissions.
- *The Science Based Target initiatives* (SBTi): aims to help on setting science-based climate change strategies to reduce greenhouse gas emissions.

This Sustainability Framework Policy was updated by the Board of Barna Steel, S.A., representing the entire Celsa Group, on 2023, July 13<sup>th</sup>.