



Transformamos el presente.
Fortalecemos el mañana.

CELSA Climate Action Policy

Approved by the Board of Directors of CELSA STEEL on 26/01/2026.

Table of Contents

1. Purpose and scope
2. Definitions
3. General guiding principles
4. Roles and responsibilities
5. Approval, communication and update process
6. References

1. Purpose and scope

Purpose: To establish a clear and effective framework for CELSA's climate action. Climate action encompasses both the reduction or mitigation of emissions of gases that contribute to global warming, and the preparation and adaptation to current and future climate changes. This policy promotes a gradual transition to a low-carbon economy, aligned with national and international commitments, including the Paris Agreement. It also establishes proactive management to identify, assess and manage climate-related risks and opportunities. Finally, it aims to strengthen CELSA's resilience to the effects of climate change, minimizing its vulnerability to phenomena such as floods or droughts, which could compromise the fulfilment of its strategic objectives.

Scope: Applies to all CELSA companies and professionals, covering all its activities, locations and operations. In investee companies, the Head of Corporate Environment will promote principles consistent with this policy and will guarantee its adequate control. CELSA will also promote the application of the principles of this policy throughout its value chain, encouraging their adoption among stakeholders, when relevant, either through dialogue, collaboration or the gradual integration of climate action criteria in purchasing processes and commercial relations. In addition, each professional is responsible for knowing, respecting and applying this policy in the development of their daily functions, actively contributing to climate action and the fulfilment of the commitments assumed by CELSA.

2. Definitions

Climate action: Climate action comprises the set of measures and strategies that an organization implements to address climate change, including mitigation, which seeks to reduce greenhouse gas emissions; adaptation, which involves adjusting to and preparing for current and future climate risks; and strengthening resilience which consists of increasing the organization's capacity to resist, recover and continue to function in the face of the adverse impacts of climate change.

Paris Agreement: International treaty adopted in 2015 whose main objective is to limit the increase in global temperature to less than 2 °C, preferably to 1.5 °C, through coordinated

actions to reduce greenhouse gas emissions and strengthen the capacity to adapt to climate change at the global level.

Decarbonization: Process that leads to the significant reduction or elimination of greenhouse gas (GHG) emissions.

Renewable energy: Energy from non-fossil renewable sources, including wind power, solar energy (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tidal energy, wave energy and other types of ocean energy, hydropower and energy from biomass, landfill gases, gases from wastewater treatment plants and biogas.

Clean energy: Energy that, in its generation and use process, does not produce significant emissions of greenhouse gases or atmospheric pollutants, contributing to decarbonization and climate change mitigation. It includes both renewable sources and other low- or zero-emission technologies, such as nuclear energy.

Greenhouse Gases (GHG): A set of gases that contribute to global warming by trapping heat in the atmosphere. The main GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), nitrogen trifluoride (NF₃), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs). The set of gases that make up this category of GHGs are those regulated in Annex V, part 2, of Regulation (EU) 2018/1999 of the European Parliament and of the Council.

Sustainability Roadmap: Inventory of initiatives that define objectives, actions and those responsible to move towards sustainability, integrating ESG (Environmental, Social and Governance) criteria in decision-making in accordance with the provisions of the Sustainability Policy. It allows the organization to anticipate challenges, align the organization for a medium-long term transformation, comply with regulations, and respond to the expectations of stakeholders. It incorporates a periodic tracking and reporting system to monitor progress and adjust actions as needed.

3. General guiding principles

Sustainability is recognized as a hub for long-term value creation. For this reason, CELSA, in addition to regulatory compliance, guides its activity in accordance with the following general guiding principles, which guide decision-making, operational management and interaction with stakeholders:

1. Integration of ESG criteria and stakeholder expectations in decision-making
2. Management of material impacts, risks and opportunities
3. Regulatory compliance and voluntary commitment
4. Flexibility and continuous evolution
5. Measurement and traceability
6. Innovation and technological development
7. Training, awareness and corporate culture
8. Transparency and responsible communication
9. Promoting sustainability in the value chain

In addition, CELSA bases its climate action on a series of specific principles, aimed at ensuring responsible action aligned with regulatory frameworks, as well as with the company's measurable objectives.

1. Climate Change Mitigation

Measure and encourage the gradual and continuous reduction of greenhouse gas emissions. Support initiatives that facilitate the decarbonization of CELSA's operations and value chain. Promote the design of products that contribute to reducing the carbon footprint to contribute to the sustainable transition of CELSA's customers.

2. Efficient and renewable use of energy

Promote energy savings and efficiency, promoting the use of renewable sources and other clean sources that contribute to the sustainable energy transition.

3. Strategic integration and climate risk management

Incorporate climate change into decision-making and risk management. Promote proactive climate risk management to reduce vulnerability and strengthen CELSA's climate resilience. Identify and take advantage of the opportunities arising from the energy transition and the low-carbon economy, promoting innovation and competitiveness and CELSA's leadership.

4. Adaptation to climate change

Promote anticipation and adaptation to climate change to strengthen CELSA's resilience to its effects, such as floods and droughts.

This approach is developed based on the methodological framework of the CSRD (Corporate Sustainability Reporting Directive), adapted to the particularities of CELSA and its sectoral and geographical context. The principles defined herein are integrated into CELSA's internal regulatory system and form part of the company's Code of Ethical Conduct.

In addition, in the preparation of this Policy, the perspectives of CELSA's main stakeholders, both internal and external, who may be affected by the impacts, risks and opportunities associated with climate change, have been considered.

4. Roles and responsibilities

The governance bases of this Policy are based on the principles established in CELSA's Sustainability Policy. This approach ensures effective, structured and transparent climate action, in line with CELSA's sustainability goals. Key responsibilities are as follows:

Board of Directors:

- To approve the Climate Action Policy, as part of its non-delegable function of defining CELSA's general policies and strategies.
- The Appointments, Remuneration and Sustainability Committee (CNRS for its acronym in Spanish), as an internal, permanent and specialized body of the Board of Directors, with advisory and supervisory functions in matters of sustainability, is responsible for supervising the implementation of this policy and forwarding to the Board any observations or proposals for updates that it deems necessary, for approval.
- The Audit and Control Committee (CAC), a collegiate and internal body of the Board of Directors, oversees the proper functioning of CELSA's risk management system, including climate risks, as well as the internal control systems related to non-financial information. This Committee evaluates the effectiveness of the control mechanisms, reviews the results of audits – internal or external – and periodically reports to the Board the most relevant aspects related to risk management and the assurance of climate and sustainability information.

Executive Committee:

- Actively promote compliance with this Policy and supervise its correct application within its areas of responsibility.

Sustainability Committee (CdS):

- As a delegated support body, it is responsible for leading the governance of sustainability, as well as promoting the integration and alignment of sustainability criteria in the management of the business and its operations. It also coordinates the implementation of this Policy in all areas of CELSA, promotes the homogeneous application of environmental criteria and carries out operational monitoring to ensure compliance.

Head of Sustainability, Environment, Public Relations and External Communications:

- Through the corporate Environment area, it is responsible for promoting the general guiding principles of this policy through the different Committees responsible for climate action, ensuring its proper application and control.

Other Corporate Functions:

- The Strategy and Processes, Purchasing, Energy, Circularity and Logistics divisions are responsible for monitoring and reporting their own direct and indirect emissions and those of the value chain in their areas of action.

Heads of each Plant and those responsible for the environment:

- CELSA's operational and business areas are responsible for the direct implementation of this Policy within their scope of action.
- This includes the identification and operational management of climate risks, compliance with the principles defined in the policy in relation to climate change

mitigation and adaptation, as well as the monitoring of key performance indicators and the application of corrective measures in the event of deviations.

5. Approval, communication and updating

The Head of Corporate Sustainability will review this Policy at least once a year, or more frequently if circumstances require it, and will update it as necessary to maintain its validity, relevance, and effectiveness. Any updates must be approved by the Board of Directors.

To guarantee CELSA's commitment to the management of climate action, this policy will be published on CELSA's website and on internal communication channels. Likewise, the necessary means will be adopted to promote their knowledge and application. In addition, a dedicated sustainability email address sostenibilidad@gcelsa.com and an ethical channel (<https://celsa.integrityline.com/>) have been set up to deal with queries and related reports.

This policy will enter into force after its approval by the Board of Directors, without prejudice to the deadlines established by the applicable regulations on climate action.

6. References

Internal Regulations:

- Code of Ethical Conduct
- Sustainability Policy
- Environmental Policy
- Risk Management and Internal Control Policy
- Purchasing Policy

External Regulations:

- Climate regulation (non-exhaustive list):
 - Law 7/2021, of 20 May, on climate change and energy transition.
 - Royal Decree 214/2025, of 18 March, which creates the register of carbon footprint, compensation and carbon dioxide absorption projects and which establishes the obligation to calculate the carbon footprint and to prepare and publish plans to reduce greenhouse gas emissions.
- Regulation of emission rights:
 - Directive 2003/87/EC: European greenhouse gas emission allowance trading system.
 - Law 1/2005, of 9 March: regulates the trading of greenhouse gas emission rights in Spain.
- Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards sustainability reporting by companies
- ISO 14001 Standard: Environmental Management System

- ISO 50001: Energy Management System