

Dialogue and Communication Policy with CELSA Stakeholders

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

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1. Purpose and scope

Purpose: To establish a clear and effective framework for communication and dialogue between the CELSA Group (hereinafter, "CELSA") and its stakeholders, guaranteeing the transparency, veracity and accessibility of economic-financial, non-financial and corporate information. This policy aims to promote relationships of trust, collaboration and mutual respect, strengthening responsible and quality communication as a fundamental pillar of CELSA's reputation and good governance. It also promotes the dissemination of relevant and truthful information, in accordance with current legislation and the best national and international practices of dialogue and communication.

Scope: Applies to all CELSA companies and professionals, covering all its activities, locations and operations. In investee companies, principles consistent with this policy will be promoted and their adequate control will be guaranteed. In addition, each professional is responsible for knowing, respecting and applying this policy in the development of their daily functions, contributing to the fulfilment of the commitments assumed by CELSA.

2. Definitions

Interest Groups or Interested Parties: all persons, groups and entities whose rights or interests may be affected by the activities, products, services or operations of the Company, its subsidiaries or its business partners, as well as those who legitimately represent them.

Financial information: A set of accounting, economic and financial data of the company that allows it to evaluate its equity, financial situation and the results of its operations. It includes, among others, financial statements, annual accounts, balance sheets, operating results and cash flows, as well as any other relevant information that facilitates the understanding of the company's economic situation by its stakeholders.

Internal Control over Financial Reporting (ICFR): A set of environmental, social and governance data, as well as other relevant sustainability aspects whose disclosure is required by current regulations. In the environmental field, topics such as climate action (mitigation and

adaptation to climate change), pollution, water management, biodiversity and the circular economy are included. On the social level, aspects related to own workers, employees in the value chain, local communities and customers are addressed. Finally, the governance dimension includes issues such as the fight against corruption, the prevention of bribery and the strengthening of corporate governance, among others.

Internal Control System over Sustainability Information Reporting (ICSIR): A set of processes and controls to ensure the reliability, integrity, accuracy, comparability and traceability of an organization's non-financial information.

Non-Financial Information Control System (NFMS): A set of processes and controls established to ensure the reliability, integrity, accuracy, comparability and traceability of the organization's non-financial information, ensuring that data on sustainability and non-financial aspects reliably reflect the company's performance and management in these areas.

3. General guiding principles

CELSA conceives dialogue and communication with its stakeholders as essential elements to generate shared value and guarantee transparency, allowing them to make informed decisions about the company. In line with its ethical and good governance commitments, dialogue and communication with its stakeholders is based on the following general guiding principles, which are integrated into CELSA's internal regulatory system and are part of the company's Code of Ethical Conduct.

1. Regulatory compliance and voluntary commitment

Ensure compliance with applicable legislation and regulation in terms of dialogue, communication and transparency with stakeholders. Promote cooperation and transparency with authorities, regulatory bodies, and other competent institutions and the voluntary application of standards of dialogue and responsible communication.

2. Ethics, integrity and respect

Maintain ethical, upright and responsible conduct in all interactions with stakeholders, based on respect and consistency with the Code of Ethical Conduct and CELSA's internal regulations. Avoid any type of bias, discrimination or practice that may affect CELSA's trust or reputation.

3. Active dialogue and collaboration

Promote a two-way, open and constructive dialogue with stakeholders, based on active listening, empathy and mutual respect. Promote stable and collaborative relationships that allow the integration of the legitimate expectations of stakeholders in CELSA's decision-making.

4. Transparency and responsible communication

Promote clear, transparent, truthful, reliable and periodic communication on CELSA's progress, results and performance, both in economic-financial and non-financial matters, which allows stakeholders to form a complete understanding of the company and make informed decisions. To ensure that the information disseminated is truthful, balanced, complete and understandable, faithfully reflecting the reality of CELSA. To ensure the traceability, reliability and consistency of published financial and non-financial information, in accordance with recognised regulatory and methodological frameworks, and to promote independent verification and continuous improvement of the internal control of the reporting systems.

5. Clear, accessible and secure communication

Ensure that relevant information is disclosed in a clear and accessible manner, using the most appropriate channels for each stakeholder group. To promote the continuous improvement of communication processes and tools, taking advantage of the opportunities offered by new technologies and communication channels.

6. Relevance and usefulness of the information

Disseminate meaningful and useful information, which facilitates a proper understanding of CELSA's performance, objectives and impact in economic, environmental, social and governance matters, thus contributing to the strengthening of trust and corporate reputation.

4. Roles and responsibilities

The governance of this Policy is based on the principles established in CELSA's Sustainability Policy, ensuring a structured, transparent and coherent approach to dialogue and communication with stakeholders. This framework ensures the quality, veracity and accessibility of the information disseminated, as well as adequate coordination between the responsible areas. Key responsibilities are as follows:

Board of Directors:

- The Board of Directors is responsible for making available to shareholders, prior to each General Meeting of Shareholders (the "General Meeting"), all legally required information or that necessary to form an informed opinion for the benefit of the corporate interest and shareholders. The General Meeting is an essential channel of communication between CELSA and its shareholders, informing on the evolution of the business and the key strategies that guide the company in the medium and long term.
- 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, supervises the proper functioning of CELSA's risk management system, including the risks of dialogue and communication with stakeholders, 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 sustainability information.
- To ensure transparency and immediate access to information, CELSA publishes all relevant documents on its corporate website, also using financial intermediaries or other agents when necessary.
- Specific and temporary channels are also enabled to promote the informed participation of shareholders, including telematic attendance, remote voting and proxy, as well as electronic communication forums, from the call to the conclusion of the Meeting.

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 the criteria for dialogue and communication with stakeholders, and carries out operational monitoring to ensure compliance.

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

- The Head of Sustainability, Environment, Public Relations and External Communications, a member of the Executive Committee, is responsible for coordinating and promoting the principles of this Policy throughout the organisation, ensuring the coherence, veracity and consistency of non-financial messages.
- It supervises the management of the general communication channels (corporate website, media, social networks) and collaborates with the Internal Communication area to ensure the correct dissemination of information to the professionals who are part of CELSA.
- In addition, it is responsible for ensuring that the content published complies with the regulatory obligations, good governance commitments and transparency criteria established by CELSA.

Ethics Committee:

- It is responsible for making available to CELSA's stakeholders a public and anonymous Whistleblowing Channel, through which any person can report, in good faith, possible legal, ethical or regulatory breaches, as well as breaches of the Code of Ethics.
- It is also responsible for the management, analysis and resolution of complaints and for ensuring the correct processing of each case in accordance with the principles of independence, objectivity, equity and protection against retaliation.

The Internal Communication Department:

- The Internal Communication Department, which reports to the Chief People Officer, is responsible for promoting fluid, transparent and coherent communication with its professionals, through the various internal communication channels, which facilitate the dissemination of relevant information and promote the connection between the different areas and people of the company.

Heads of each Plant and Operational Areas

- CELSA's operational and business areas are responsible for applying this Policy in their area, ensuring clear, coherent communication aligned with corporate messages.
- They participate in the generation and dissemination of relevant information to CELSA professionals and local stakeholders and collaborate in the updating of operational content that is channeled through CELSA's official media and platforms.

5. Approval, communication and updating

The Head of Sustainability, Environment, Public Relations and External Communications, the Legal and Compliance Department, together with the Internal Communications Department, 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 ensure its proper implementation, 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 enforceability deadlines established by the applicable regulations on sustainability.

6. References

Internal Regulations:

- Code of Corporate Ethics
- Supplier Code of Conduct
- Corruption and Bribery Prevention Policy
- Conflicts of Interest Policy
- Personal Data Protection Policy
- Internal Information System Policy
- Risk Management and Internal Control Policy
- Purchasing Policy
- Human Rights and Environmental Due Diligence Policy
- Sustainability Policy

External Regulations:

- 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
- Law 19/2013, of 9 December, on transparency, access to public information and good governance