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Fortalecemos el mañana.

CELSA Environmental Policy

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 CELSA's environmental management, focused on the prevention of pollution and the continuous improvement of its environmental impact. This policy complements the specific policies of Climate Action, Circular Economy and Procurement, where these areas are developed in depth, in line with CELSA's purpose: "we give infinite lives to finite resources". In addition, its application guarantees legal compliance and proactive management to identify, assess and manage environmental risks.

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 its adoption among stakeholders, when relevant, either through dialogue, collaboration or the gradual integration of environmental criteria in purchasing processes and commercial relationships. In addition, each professional is responsible for knowing, respecting and applying this policy in the development of their daily functions, actively contributing to the protection of the environment and the fulfilment of the commitments assumed by CELSA.

2. Definitions

Pollution: The direct or indirect introduction, as a result of human activity, of pollutants into the atmosphere, water or soil, which may have harmful effects on human health or the environment, which may cause damage to material property, or which may deteriorate or hinder the enjoyment and other legitimate uses of the environment. It can be classified according to the medium affected or the type of impact generated:

- **Water:** Emission of pollutants by the company into surface or underground bodies of water, such as rivers, lakes, seas and aquifers. This pollution can alter water quality, affect aquatic biodiversity, and compromise its use for human, agricultural, or industrial consumption.
- **Air:** Release of pollutants into the air – both indoors and outdoors – as a result of industrial, logistical or energy processes. These emissions can include toxic gases, particulate matter, and volatile organic compounds that affect human health and contribute to climate change.

- Soil: introduction into the soil, as a result of human activity, of substances, vibrations or heat that may have harmful effects on human health or the environment, cause damage to material property or deteriorate or hinder the enjoyment and other legitimate uses of the environment. Soil pollutants include inorganic pollutants, persistent organic pollutants (POPs), pesticides, nitrogen and phosphorus compounds, among others.
- Acoustics: generation of high noise levels as a result of industrial, logistical or transport activities that exceed the permitted thresholds and negatively affect human health, wildlife and the quality of life of nearby communities.
- Lighting: excessive or misdirected emission of artificial light from industrial, logistical or security facilities that alters the natural cycles of light and darkness.

Substances of concern and substances of very high concern: Any substance that, due to its hazardous properties, may pose a significant risk to human health or the environment and that may adversely affect the reuse and recycling of materials in the product in which it is present, as defined in the relevant Ecodesign requirements for specific Union products. Substances of concern are those that meet the criteria set out in Regulation (EC) No 1907/2006 and No 1272/2008 of the European Parliament and of the Council. Substances of very high concern are those that meet the criteria of Regulation No 1907/2006 (REACH).

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 environmental management on a series of specific principles, aimed at guaranteeing responsible action aligned with regulatory frameworks, as well as with the organization's measurable objectives.

1. Pollution prevention

Promote the prevention and reduction of water, air, soil, acoustic and light pollution through risk mitigation controls, as well as their measurement and monitoring. Support the adoption of practices and technologies that minimize environmental impact, and drive continuous measurement and monitoring of relevant environmental parameters, ensuring compliance with legal requirements and continuous improvement.

2. Standardization of environmental management systems

Promote standardized and efficient environmental management through the adoption and implementation of recognized systems, such as ISO 14001. This standardization establishes clear processes, ensures regulatory compliance and facilitates continuous improvement, promoting a culture committed to environmental protection. In addition, it integrates environmental management in a systematic and uniform way throughout CELSA's operations.

3. Prevention of the production, use, distribution and marketing of substances of concern and very high concern

Promote the identification, control and reduction of substances of concern and very high concern in the production, use, distribution and marketing of CELSA. Promote strict compliance with current regulations and the search for safer alternatives, minimizing risks to human health and the environment. Promote training and internal awareness for responsible and preventive management.

4. Strategic integration and management of environmental risks and impacts

Incorporate environmental management into decision-making and risk management, ensuring its integration into strategy and operations. Promote proactive management of environmental risks to strengthen operational resilience, ensure regulatory compliance, and improve CELSA's environmental performance.

This approach is developed on the basis of 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, have been considered, which may be affected by the impacts, risks and opportunities associated with the environment.

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 environmental management, in line with CELSA's sustainability objectives. Key responsibilities are as follows:

Board of Directors:

- To approve the Environmental 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, supervises the proper functioning of CELSA's risk management system, including environmental 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 environmental and sustainability information.

Executive Committee:

- Actively promote compliance with this Policy and supervise its correct application within its areas of responsibility.
- Ensure the early identification of environmental risks and guarantee the timely intervention of the Head of Legal in any meeting, decision or initiative with possible implications in this area.

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.

The Head of Corporate Sustainability, Environment, Public Relations and External Communication:

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

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 environmental risks, compliance with the principles defined in the policy, particularly in relation to pollution prevention and control, 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 Sustainability, Environment, Public Relations and External Communications 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 deadlines established by the applicable regulations on climate action.

6. References

Internal Regulations:

- Code of Ethical Conduct
- Sustainability Policy
- Climate Action Policy
- Circular Economy Policy
- Risk Management and Internal Control Policy
- Purchasing Policy

External Regulations:

- Royal Legislative Decree 1/2016 on industrial emissions.
- 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

- Directive (EU) 2024/1203 of the European Parliament and of the Council of 11 April 2024 on the protection of the environment through criminal law, replacing Directives 2008/99/EC and 2009/123/EC
- Regulation (EC) No 1907/2006 and No 1272/2008 of the European Parliament and of the Council
- Regulation No 1907/2006 (REACH)
- ISO 14001 Standard: Environmental Management System
- ISO 50001: Energy Management System
- ISO 14021 Standard: Environmental Labels and Declarations
- SustSteel Standard: Sectoral Sustainability Management System for Steel
- UNE 36901 Standard: Steel Sustainability Management System