

# CELSA Human Rights and Environmental Due Diligence 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 human rights and environmental due diligence framework that allows for the detection, evaluation, prevention, mitigation, supervision, communication and, where appropriate, reparation of the actual or potential adverse effects derived from the activities of the CELSA Group (hereinafter, "CELSA"), on its stakeholders and throughout its chain of activities.

This policy complements and illustrates CELSA's commitment to human rights and the environment, which is already reflected through the principles established in the People and Sustainability Policies, as well as in the policies on specific topics, the Code of Ethical Conduct, and in CELSA's different policies, procedures and other internal rules.

**Scope:** This policy applies to all of CELSA's companies and professionals, covering all of its activities, locations and operations. In investee companies, principles consistent with this policy will be promoted and their adequate control and monitoring will be guaranteed.

CELSA will also promote the progressive application of the principles of this policy throughout its chain of activities, encouraging their adoption among direct trading partners when relevant, either through dialogue, collaboration or the progressive integration of the principles of due diligence in human rights and the environment.

## 2. Definitions

**Chain of activities:** It covers all business operations and relationships linked to the production and provision of goods or services of an organization, both upstream (design, extraction, supply, manufacture, transportation, storage, supply and development of products or services), and downstream (distribution, transportation and storage of the company's products, provided that they are carried out for the organization or on its behalf).

**Human rights and environmental due diligence:** Continuous process by which the company identifies, assesses, prevents, mitigates, monitors, communicates and repairs

potential adverse impacts on human rights and the environment, integrating these actions into its policies and management systems. This process includes the identification, assessment and treatment of the associated risks, applying measures proportionate to the resources available to the company and contributing to sustainable development and the transition to sustainable economic and social models.

**Human Rights:** A set of fundamental rights and freedoms, inherent to all persons and universal, recognized in the Universal Declaration of Human Rights, the International Covenants on Human Rights and the fundamental Conventions of the ILO, which companies have a responsibility to respect throughout their operations and business relations in accordance with the Guiding Principles on Business and Human Rights of the United Nations United Nations (UN) and the Guidelines of the Organization for Economic Cooperation and Development (OECD).

**Adverse effect on human rights:** the harmful consequences for individuals arising from the violation of any of the human rights protected by the international instruments of reference and the applicable legal frameworks. These effects can be real, when the damage has occurred, or potential, when there is a risk that the damage may occur.

**Adverse effect on the environment:** the harmful consequences for the environment arising from the damage, deterioration or degradation of ecosystems, natural resources or environmental conditions. These effects can be real, when the damage has occurred, or potential, when there is a risk that the damage may occur.

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

**Direct business partner:** An entity with which the company has a commercial agreement related to the company's operations, products, or services or to which the company provides services for its chain of activities.

### 3. General guiding principles

CELSA recognises that respect for human rights and the environment is an ongoing process and is therefore committed to reviewing and updating the measures adopted to implement due diligence, in order to ensure that they reflect the evolution of circumstances, the nature of its activities and its business relationships.

#### 1. Grounding due diligence on international frameworks

Respect for human rights is based on national and international standards, practices and recommendations of reference, including the United Nations (UN) Guiding Principles on Business and Human Rights, the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises on

Responsible Business Conduct, the OECD Due Diligence Guide for Responsible Business Conduct and the International Labour Organization's (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, as well as the documents and texts that complement the above-mentioned instruments. In line with this commitment, CELSA undertakes to comply with applicable legislation on human rights and the environment and to apply the principles of due diligence established in this policy in the development of its activity.

CELSA has also been a member of the United Nations Global Compact since 2021 and reaffirms its commitment to its ten universal principles related to human rights, working conditions, environmental protection and the fight against corruption. In addition, CELSA expressly rejects any form of modern slavery, forced labor, human trafficking or servitude and undertakes to contribute, within its capacities and operational context, to the protection and guarantee of human rights, in accordance with international frameworks of reference.

## 2. Integrate due diligence into risk management policies and systems

Define and develop the processes necessary to integrate due diligence and its application procedures in the company, based on the approach described in this policy. Integrate due diligence into the company's policies, procedures and risk management systems, promoting an operational, progressive and transversal application in the different areas of CELSA.

## 3. Responsibly manage adverse human rights and environmental impacts

Responsibly manage negative impacts on human rights and the environment arising from its operations and those of its direct business partners. The company shall identify and assess actual and potential risks, prioritising the most serious or likely risks, and shall take proportionate measures to prevent, mitigate or, where they have already materialised, eliminate them or reduce their scope. Where appropriate, CELSA will also contribute to the reparation of the real impacts it has caused or to which it has contributed, in accordance with the applicable regulations and international reference frameworks.

## 4. Engage constructively with stakeholders

Engage constructively and transparently with stakeholders throughout the due diligence process, with the aim of identifying, preventing, minimizing, and repairing potential adverse effects. Ensure access to a notification and complaint mechanism accessible to interested parties that allows concerns or complaints about adverse effects related to CELSA's operations, subsidiaries or direct business partners to be raised anonymously, confidentially and without retaliation.

## 5. Measurement and traceability

Periodically monitor the effectiveness of the measures taken to identify, prevent, mitigate, eliminate, minimize and remedy adverse effects, and update the due diligence process when necessary to reflect changes in CELSA's activities, operating context or business relationships.

#### 6. Training, awareness and corporate culture

To promote the training and awareness of the people who are part of or collaborate with CELSA in the field of due diligence, promoting a committed organisational culture aligned with the vision of the principles of this policy.

#### 7. Transparency and responsible communication

Communicate in a transparent, periodic, accessible and lawful manner, relevant information on due diligence processes, including the identification and management of actual or potential adverse effects, as well as the measures adopted to prevent, mitigate, eliminate, minimize and repair such effects.

## 4. Roles and responsibilities

The governance bases of this Policy guarantee an effective, structured and transparent management of sustainability, in line with CELSA's objectives in this area. Key responsibilities are as follows:

#### Board of Directors:

- To approve the Human Rights and Environmental Due Diligence Policy, as part of its non-delegable function of defining CELSA's general policies and strategies. It is also responsible for supervising its implementation and ensuring its alignment with the rest of the Group's policies, ensuring consistency with the sustainability roadmap and with CELSA's ethical and corporate responsibility commitments.
- The Appointments, Remuneration and Sustainability Committee (CNRS for its acronym in Spanish), as an internal, permanent and specialised 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 it deems necessary.
- 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 risks arising from adverse human rights and environmental impacts, as well as internal control systems linked to due diligence and non-financial reporting. 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, the prevention of adverse impacts and the assurance of 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 and dependent on the Executive Committee, 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 Due Diligence criteria and carries out operational monitoring to ensure compliance.

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

- Through the Corporate Sustainability area, it is responsible for promoting the general guiding principles of this policy through the different Sustainability Committees, ensuring its proper application and control. Among which are the Sustainability Committees by Business Unit and/or by Plant.

**Head of Compliance and Risk:**

- Lead the assessment of potential direct business partners based on their risk, establish and monitor the corresponding measures and action plans, ensure the application of this Policy and complementary procedures, as well as lead the continuous improvement of the due diligence process in relation to such partners.
- Through the Counterparty Risk Committee, the specific committees that are referred to it and the corporate support teams, which provide support to the purchasing and sales areas to ensure compliance with the applicable regulation and the principles defined in CELSA's strategic plans.

**Operational and Business Areas:**

- CELSA's operational and business areas are responsible for the direct implementation of this Policy within their scope of action. This includes integrating due diligence processes into their activities, identifying and managing risks and adverse effects on human rights and the environment, as well as monitoring defined action plans and implementing corrective measures where necessary.

## 5. Approval, communication and updating

The Head of Corporate 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](mailto:sostenibilidad@gcelsa.com) and an ethical channel (<https://celsa.integrityline.com/>) have been set up to deal with queries and related reports. This channel is enabled both inside and outside the organization, to report any breach of the principles detailed in this policy and implement the necessary remediation measures.

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 due diligence.

## 6. References

### Internal Regulations:

- Code of Ethical Conduct
- Sustainability Policy
- Climate Action Policy
- Circular Economy Policy
- Purchasing Policy
- Risk Management and Internal Control Policy
- Corruption and Bribery Prevention Policy
- Stakeholder Dialogue and Communication Policy
- Health and Safety Policy
- People Policy
- Criminal Compliance Policy
- Antitrust Compliance Policy
- Conflicts of Interest Policy
- Personal Data Protection Policy
- Internal Information System Policy

### External Regulations:

- United Nations Guiding Principles on Business and Human Rights
- Organisation for Economic Co-operation and Development (the "OECD") Guidelines for Multinational Enterprises on Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Business Conduct
- International Labour Organization (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- United Nations Global Compact
- Corporate Sustainability Reporting Directive (CSRD)
- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investments and amending Regulation (EU) 2019/2088 (European Taxonomy)

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals in Conflict-Affected or High-Risk Areas
- Carbon Border Adjustment Mechanism (CBAM)