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Fortalecemos el mañana.

CELSA Sustainability 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 sustainability management. This policy aims to serve as a framework of reference for CELSA's actions in the environmental, social and governance (ESG) field. It is developed through specific ESG policies and in line with CELSA's purpose: "we give infinite lives to finite resources". In addition, its application guarantees legal compliance and proactive management aimed at identifying, evaluating and managing impacts, risks and opportunities in terms of sustainability in line with CELSA's sustainability objectives. It also strengthens the control of the quality, reliability and transparency of the non-financial information that is prepared, reviewed and disclosed.

Scope: Applies to all CELSA companies and professionals, covering all its activities, locations and operations. In investee companies, the Head of Corporate Sustainability will promote principles consistent with this policy and will ensure its adequate control. CELSA will also promote the application of the principles of this policy throughout its value chain, encouraging their adoption among stakeholders, where relevant, either through dialogue, collaboration or the gradual integration of sustainability criteria into CELSA's chain of activity. In addition, each professional is responsible for knowing, respecting and applying this policy in the development of their daily functions, actively contributing to sustainability and compliance with the commitments assumed by CELSA.

2. Definitions

Double Materiality: Methodological principle to determine the significant impacts that an organization causes on the environment (materiality of impact), and the risks and opportunities that environmental, social and governance (ESG) issues generate in the organization (financial materiality). This approach recognizes that ESG aspects can be relevant both for their effect on society and the environment and for their influence on financial performance and business resilience.

Sustainability Roadmap: Inventory of initiatives that define objectives, actions and those responsible for moving towards sustainability, integrating ESG 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.

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.

Sustainability: Ability to meet the needs of the present without compromising the ability of future generations to meet their own needs, integrating economic, social and environmental protection in a balanced way. This concept seeks a balance between profitability and social and environmental responsibility, thus contributing to the company's long-term resilience and the lasting well-being of people and the planet.

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

To promote decisions aligned with ESG criteria, balancing the creation of long-term sustainable value with the demands of the business and the specific context of CELSA. Under this principle, the Sustainability Roadmap is configured as an operational instrument, aimed at translating this strategic vision into specific objectives, taking into account the interests and needs of stakeholders.

2. Management of material impacts, risks and opportunities

Identify, prevent and mitigate negative impacts and risks in terms of sustainability, including human rights and the environment, through a comprehensive analysis based on the principle of Double Materiality and the risk profile defined by CELSA's Board of Directors, in coherence with the Risk Management and Internal Control Policy. Likewise, to identify and enhance the positive impacts and material opportunities that contribute to sustainability management.

3. Regulatory compliance and voluntary commitment

Ensure compliance with applicable legislation and regulations on sustainability. Promote voluntary adherence to national and international sectoral initiatives, pacts and standards relevant to the company, such as the Sustainable Development Goals (SDGs) or the Principles of the United Nations Global Compact.

4. Flexibility and continuous evolution

Sustainability must be managed through a dynamic strategy, integrated into the core of business activity, capable of anticipating and adapting to constantly evolving regulatory frameworks, environments and social expectations. This approach involves the periodic review of objectives and action plans, scenario-based planning, and the incorporation of multiple perspectives. Modular and scalable solutions that strengthen resilience and competitiveness will be promoted. Sustainability is conceived as an evolutionary and transversal axis that guides decision-making in the short, medium and long term.

5. Measurement and traceability

Develop metrics and encourage the use of tools to measure sustainability performance and strengthen data-driven decision-making. Promote the traceability of resources throughout the life cycle of products and production processes. Promote environmental certifications and labeling that support the sustainability of the company and its products.

6. Innovation and technological development

Promote research, development and innovation, ensuring the appropriate use of new technologies to improve the efficiency of organizational and production processes, and strengthen the resilience of business models. Support solutions that drive a low-carbon, circular, efficient and resilient economy.

7. Training, awareness and corporate culture

To promote the training and awareness of CELSA professionals and its collaborators in the field of sustainability, promoting an organizational culture committed to and aligned with the company's global strategic vision, and in particular with its sustainability objectives.

8. Transparency and responsible communication

Encourage clear, transparent and regular communication on progress and results in sustainability, both internally and externally. To guarantee the quality and traceability of the non-financial information published by CELSA, in accordance with the recognized regulatory and methodological frameworks. Promote independent verification and continuous improvement of the Internal Control System over Sustainability Information Reporting (ICSIR), ensuring consistent and reliable

communication on sustainability performance. Promote an open dialogue with stakeholders to integrate their perspectives in a balanced way in decision-making, in line with CELSA's context and objectives.

9. Promoting sustainability in the value chain

Promote sustainability in the value chain, encouraging the adoption of principles and good practices among the main stakeholders. To promote two-way communication with key stakeholders to incorporate their needs and expectations into CELSA's sustainability performance.

The principles defined here are aligned with CELSA's strategy, its sectoral and geographical context, and are integrated into CELSA's internal regulatory system and form part of the company's Code of Ethical Conduct. In addition, the perspectives of CELSA's main stakeholders, both internal and external, have been considered in the preparation of this Policy, which may be affected by the impacts, risks and opportunities in terms of sustainability.

In line with this framework, the methodological model of the CSRD (Corporate Sustainability Reporting Directive) and its European Sustainability Reporting Standards (ESRS), is incorporated as a reference for the preparation and communication of non-financial information.

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 Sustainability 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 sustainability risks, as well as the internal control systems related to 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 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 Management 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 sustainability criteria and carries out operational monitoring to ensure compliance.

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

- Through the Corporate Sustainability area, it is responsible for promoting the general principles of action 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.

Addresses 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 sustainability risks, the fulfilment of the objectives defined in the Sustainability Roadmap, 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 enforceability deadlines established by the applicable regulations on sustainability.

6. References

Internal Regulations:

- Code of Ethical Conduct
- Climate Action Policy
- Circular Economy Policy
- People Policy
- Health and Safety Policy
- Corruption and Bribery Prevention Policy
- Stakeholder Dialogue and Communication Policy
- Due Diligence Policy
- Risk Management and Internal Control Policy
- Purchasing Policy

External Regulations:

- Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 on corporate sustainability reporting.
- Law 11/2018, of 28 December, amends the Commercial Code and establishes new obligations on the disclosure of non-financial information and diversity for certain companies in Spain
- ISO 14001 Standard: Environmental Management System
- ISO 50001: Energy Management System
- ISO 14021 Standard: Environmental Labels and Declarations
- ISO 45001 Standard: Occupational Health and Safety Management System
- SustSteel Standard: Sectoral Sustainability Management System for Steel
- UNE 36901 Standard: Steel Sustainability Management System
- BES 6001 Standard: Responsible Sourcing