Anti-Corruption, Bribery, and Fraud Policy

Gestamp Automoción Group

November 4, 2025

Version	Emitter	Supervisor	Approval Body	Entity	Date of approval
1.0	Regulatory Compliance Unit	Audit Committee	Board of Directors	Gestamp Automoción, S.A. and controlled companies	December 17, 2018
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1. INTRODUCTION AND PURPOSE

Corruption, bribery and fraud are a very present phenomenon in today's society. These illicit activities hinder economic and social development, weaken the rule of law and, in the business sphere, generate significant risks to fair competition, sustainability and corporate reputation. Gestamp Automoción, S.A. (the "**Company**") and the companies in which it has control (hereinafter, the "**Group**") are firmly committed to maintaining a principle of zero tolerance against corruption, bribery and fraud, ensuring that the activities carried out for the development of its business comply with the ethical principles of its Code of Conduct and other internal regulations. and with the laws applicable in all the countries in which it operates and, in particular, with those laws and principles relating to corruption, bribery and fraud.

In order to guarantee this commitment, the Group has implemented a Compliance System that, in line with international best practices, aims to prevent, detect and respond to any conduct that involves non-compliance with applicable regulations, both external and internal.

Within the framework of this System, a Criminal Risk Prevention Model (hereinafter, the "**MPRP")** has been developed whose purpose is (i) to identify the criminal risks that could potentially materialize within the Group, (ii) to analyze and evaluate the identified criminal risks, (iii) to determine and establish the necessary controls for the prevention or minimization of the materialization of such risks and (iv) to establish action plans in those areas where a need for improvement has been detected.

The MPRP integrates policies, procedures, internal controls, training and secure information channels, under the supervision of a structure of internal bodies specialized in internal control and regulatory compliance.

This Anti-Corruption, Bribery and Anti-Fraud Policy (hereinafter referred to as the "**Policy**") is integrated into the Group's Compliance System and MPRP, developing the principles against corruption, bribery and fraud set out in the Code of Conduct and concretizing them into specific obligations. The Policy is configured as the central axis of the prevention of these risks, and its purpose is to project and establish the general parameters of action that must be followed by directors, managers and employees contractually linked to the companies of the Group, as well as by third parties that are related to it, allowing to prevent, identify and mitigate any form of corruption, bribery or fraud within the organisation and send a strong message of opposition to such conduct.

In this regard, and given that corruption, bribery and fraud can materialise through third parties related to the Group (intermediaries, partners, suppliers or customers), this Policy will be understood to be complemented by the Third Party Due Diligence Policy, which regulates the framework for action for the identification, analysis and mitigation of integrity risks and international sanctions associated with counterparties with which the Group maintains commercial relations.

This Policy constitutes the general regulatory framework for the prevention of corruption, bribery and fraud for all the companies of the Group, and is applied uniformly and as a matter of priority in all the jurisdictions in which it operates.

Notwithstanding the foregoing, when the applicable local regulations establish additional or more specific requirements, the Group's companies must adapt their internal procedures to comply with these requirements, maintaining in all cases consistency with the principles and obligations set out in this Policy.

Since 2008, the Group has been a signatory of the Principles of the United Nations Global Compact, becoming a partner of the Global Compact since 2011. The Global Compact is a practical framework for developing, implementing and disseminating corporate social responsibility policies and practices in the areas of Human Rights, Labour Standards, Environment and Anti-Corruption. Specifically, and in accordance with the Tenth Principle, the Group formally assumes the commitment to work against corruption in all its forms, including extortion and bribery, and to develop concrete policies and programs that address the issue of corruption.

The Group is also aligned with the main international references on corporate responsibility and anti-corruption, such as the recommendations of the Organisation for Economic Co-operation and Development (OECD), the *Foreign Corrupt Practices Act* (FCPA) of the United States and the *Bribery Act* of the United Kingdom.

2. PRINCIPLES OF ACTION

The principles on which this Policy is based are as follows:

(a) In the performance of its business activity, the Group does not tolerate any type of corruption, bribery or fraud, or any other type of illicit or fraudulent or unethical behaviour. At all times, the Group will comply with the legislation in force in each country in which it operates and with its own internal regulations.

(b) The principle of "zero tolerance" towards corruption, bribery or fraud will take precedence over obtaining any type of economic benefit or competitive advantage for the Group.

(c) The relations of the persons linked to the Group, both with any authority or public official and with any third party, must be based on the strictest transparency, honesty and integrity.

(d) The Group encourages the use of the Internal Information System, allowing employees, partners, suppliers and customers to report irregularities and possible criminal acts or acts contrary to this Policy, the Code of Conduct and other applicable regulations.

(e) In the course of this Internal Information System, irregularities and possible criminal acts will be analysed and investigated as quickly as possible, applying the principles of confidentiality, non-retaliation and protection of personal data to all persons involved in the investigation process, with special attention to the complainant and the person reported.

(f) If the infraction is proven, the corresponding sanction will be imposed by the competent internal bodies.

(g) The Group will collaborate and cooperate with the authorities, judicial and administrative bodies, in relation to the investigation of alleged criminal acts that may be committed within it.

(h) The Group promotes a culture of integrity through continuous training on ethics and compliance. Likewise, its employees, partners, suppliers and customers will be promoted and encouraged to be aware of this Policy and to adopt behavioural guidelines consistent with it.

3. ANTI-CORRUPTION, ANTI-BRIBERY AND ANTI-FRAUD RULES

3.1. PUBLIC CORRUPTION

The Group, among others, strictly prohibits the following conduct:

(a) Offering, promising or granting to authorities and/or public officials any type of benefit or advantage, with the purpose of making the authority and/or public official act or refrain from acting in relation to the exercise of their public functions.

(b) Influencing a public official or authority by using the personal relationship with him or her, in order to obtain an advantage or benefit of any kind.

(c) Make facilitation payments, directly or through third parties. "Facilitation payments" shall be understood as those small payments made to public officials or authorities for the purpose of initiating, facilitating or expediting the performance of administrative or similar procedures.

(d) Offering, delivering or promising gifts, invitations, trips, or other hospitality to authorities or public officials, unless they are of symbolic value and are permitted under the provisions of the Regulations on Gifts and Hospitality.

(e) Making donations, sponsorships, contributions or any other economic or in-kind benefit in favour of entities, organisations or activities linked, directly or indirectly, to authorities, public officials or politically exposed persons, when their purpose is to unduly influence the adoption of official decisions or to obtain undue advantages. Any donation or sponsorship must comply with the applicable regulations in each jurisdiction, respond to legitimate purposes and have prior and documented authorization.

(f) Using intermediaries, consultants, agents or any third party to channel improper payments or illicitly influence decisions of authorities or public officials.

(g) The hiring, directly or indirectly, of former officials or politically exposed persons who are subject to periods of incompatibility, disqualification or restriction established by the applicable regulations in each jurisdiction.

3.2. PRIVATE CORRUPTION

The Group strictly prohibits the following conduct in the field of relations between private entities:

(a) To promise, offer or grant to directors, administrators, employees or collaborators of a private company any advantage or benefit, in order to obtain preferential treatment, advantageous contractual conditions or any other illicit benefit.

(b) Receiving, requesting or accepting, from a director, administrator, employee or collaborator of the Group, any advantage or benefit as consideration to unjustifiably favour a third party in the contracting, execution or termination of a commercial relationship.

(c) Offering, soliciting, or accepting hidden commissions, bribes, or undeclared incentives in the framework of business relationships with third parties.

3.3. FRAUD

The Group, among others, strictly prohibits the following conduct:

(a) Falsifying any information, data or document, including financial, accounting, technical or commercial information in order to mislead partners, customers, suppliers or any other interested party.

(b) Use of corporate structures, simulated contracts or legal artifices to hide fraudulent transactions.

(c) Using deception or trickery on the part of employees who are remunerated for objectives in an essential and main way to obtain the remuneration linked to the achievement of those objectives.

(d) To deceive about the conditions in the provision of a service, the characteristics of a product or the execution of an activity.

(e) Alienating, encumbering or leasing movable or immovable property over which there is no power of disposal.

(f) To dispose of an asset by concealing its charges, or to alienate or encumber an asset that has already been disposed of, before the definitive transfer of the asset.

(g) Carrying out acts of disposition of assets that delay, hinder or impede the effectiveness of a seizure or an executive or enforcement procedure, whether judicial, extrajudicial or administrative, whether initiated or foreseeable to be initiated.

(h) The lifting or concealment of assets that prevents the collection of creditors, whatever the nature or origin of the obligation or debt, including the economic rights of workers, whether the creditor is an individual or any legal person, public or private.

(h) Acquiring, using, converting, or transferring property knowing that it comes from criminal activity.

(i) Not to keep the strictest confidentiality about all the information they access as a result of their professional performance and they must refrain from using it improperly for their own benefit or that of third parties.

(j) Issuing or accepting false or simulated invoices; applying deductions, rebates or unfair tax benefits; to carry out fictitious registrations or deregistrations of workers; making an incorrect remuneration classification with the purpose of reducing contributions; intentionally omitting the practice or payment of withholdings or compulsory social contributions; or simulate displacements or special regimes in order to avoid legal obligations.

(k) Filing tax returns, withholdings or social contributions with knowledge of their inaccuracy or incompleteness; deliberately delaying their filing or payment to obtain an undue advantage; or altering accounting or payroll records with the aim of modifying the taxable base or the contribution base.

3.4. CORRUPTION THROUGH INTERMEDIARIES

The conduct provided for in this section shall also be prohibited in the case of being carried out through intermediaries or third parties.

In order to prevent this type of conduct, the following precautions are adopted, among others:

(i) Commercial processes and transactions shall be documented in writing and duly accounted for, in order to ensure the traceability of all operations.

(ii) In compliance with the regulations governing listed companies and in line with good practices in corporate governance, an Internal Control System for Financial Reporting (ICFR) has been developed that is part of the Group's internal control and is configured as a set of processes that the Board of Directors, the Audit Committee, Senior Management and the employees involved carry out to provide reasonable assurance regarding the reliability of the regulated financial information.

(iii) Employees of the Group are not authorized to enter into contracts or carry out operations on behalf of the Group, without having the corresponding authorization or power of attorney. In addition, when employees negotiate on behalf of the Group, they must provide the information in a complete, transparent, understandable, accurate and precise manner.

(iv) Any payment to be made in the Group must be made by cheque or bank transfer, and payments in cash or by bearer cheque are expressly prohibited.

(v) All contracts entered into by the Group will be based on the commitment and willingness to enter into force and comply with what is agreed therein. For this reason, the Group's employees may not prevent or hinder the performance of the contracts and the obligations assumed therein.

Along with these prohibitions relating to corruption, bribery and fraud, the Group prohibits any practices

aimed at undermining market integrity, including:

(a) Carrying out acts of unfair competition, such as the misappropriation of trade secrets or confidential information, the dissemination of information that discredits competitors or the adoption of practices aimed at hindering their commercial activity.

(b) Participation in money laundering operations derived from criminal activities, through the acquisition, conversion, use or transfer of assets with knowledge of their illicit origin.

4. GIFTS AND HOSPITALITY

Giving or receiving gifts and hospitality can be a sign of goodwill or courtesy in business relationships, but some gifts due to their entity or relevance can be considered a form of corruption. Gifts or hospitality must be reasonable, proportionate and comply not only with current laws but also with the Group's Gift and Hospitality Regulations.

The Group regulates invitations, gifts and donations in accordance with these Regulations, and the following requirements must be met:

(a) The gift or attention must be allowed by local legislation, regulation and politics, according to each country.

(b) No gift or care is offered or accepted in exchange for a fraudulent advantage.

(c) The nature, value and frequency of the gift or attention must be appropriate to the occasion on which it is given and to the circumstances of the recipient.

(d) The benefit must be offered or received in a transparent manner, that is, it must be authorized in accordance with internal regulations, and susceptible to being identified and audited.

(e) It is prohibited to offer or accept gifts in cash or cash equivalents, such as gift cards, vouchers, gift vouchers or other instruments that represent monetary value or benefits that, by their repetition, may compromise the independence of the recipient, or generate a real, potential or perceived conflict of interest.

5. DONATIONS OR GRANTS

The Group maintains a policy of political neutrality and prohibits any financial contribution, donation or benefit in kind to political parties, candidates, public officials or their members. Likewise, it is prohibited to make donations, sponsorships or aid, direct or indirect, to entities linked to authorities, public officials or politically exposed persons, when their purpose is to unduly influence official decisions or obtain undue advantages. For the purposes of complying with this principle:

(a) The Group will ensure at all times that donations or sponsorship activities do not violate or breach any applicable law or regulation, or that these actions serve to finance any illegal activity.

(b) No donations may be made on behalf of the Group without the prior written consent of the Group Management. The Group Management will ensure that the authorised donations are not linked to any political activity or are intended for political parties or their members.

Donations must respond to legitimate purposes, be proportional, transparent and registered in accordance with internal procedures, and donations in cash or through instruments that prevent traceability are prohibited.

6. POLICY COMPLIANCE

Compliance with this Policy, as well as with the rest of the applicable internal and external regulations, is an essential condition for the maintenance of the employment, contractual or any other relationship that the recipients of the same maintain with the companies of the Group.

Failure to comply with this Policy may result in disciplinary measures in accordance with the applicable labor regulations, without prejudice to any civil, administrative, or criminal liabilities that may arise.

Any person who has knowledge or a well-founded suspicion of conduct contrary to this Policy, the Code of Conduct or the applicable regulations, must report it through the Internal Information System, using the channels provided.

All recipients of this Policy should bear in mind that non-compliance with it, as well as with any other applicable internal or external regulations, could lead to the imposition of criminal sanctions, exposing the Group to serious operational, financial and reputational risks, among others.

Any doubt or query regarding the compliance, application or interpretation of this Policy must be communicated to the Regulatory Compliance Unit, via email corporatecompliance@gestamp.com.

7. MONITORING AND CONTROL

The Regulatory Compliance Unit and the Compliance Office will be responsible for compliance with the Policy, ensuring that the Group's principles of action and rules against corruption, bribery and fraud are integrated into all the activities carried out by the Group. They will also supervise the proper functioning of the mechanisms necessary to prevent and detect corruption and fraud behaviour.

8. APPROVAL

This Policy has been approved by the Board of Directors and any modification thereof will require the approval of said body.

This Policy will be reviewed and updated when necessary to adapt it to the new legal, social or economic reality that takes place at any given time.