

ETHICAL, SOCIAL AND ENVIRONMENTAL REQUIREMENTS FOR SUPPLIERS OF GOODS AND SERVICES

This document must be complied with by all Gestamp Group suppliers and their employees, as well as any subcontractors (jointly referred to as the “suppliers”), regardless of the country or territory in which said suppliers and employees are providing their services, in the areas of human rights, labor standards, business ethics, environmental protection and safety.

ETHICS

Suppliers must respect the applicable laws and establish the highest standards in terms of ethics, social responsibility and transparency. They must uphold sound principles in their business relationships, rejecting unfair competition, corruption, bribery and conflicts of interest.

- **Legal compliance:** Suppliers are required to act at all times in accordance with the legal requirements that apply to their activity and to their business relationship with the Gestamp Group. They must also respect the laws and sector codes that apply to them.
- **Free competition:** Suppliers will bear in mind the regulations that apply to them regarding competition; more specifically, they will abstain from any anti-competitive practices.
- **Responsibility and transparency:** Suppliers must conduct their financial transactions in a transparent and rigorous manner, reflecting in this way all financial, non-financial, commercial or business information they may publish.
- **Corruption and money laundering:** Suppliers must not participate in or support any kind of fraudulent or corrupt behavior, which includes the offering and acceptance of bribes, gifts and facilitating payments. Suppliers must not take part in or support money laundering.
- **Conflicts of interest:** Suppliers will encourage measures aimed at ensuring that their employees avoid situations in which their financial interests enter into conflict with their job responsibilities, and that they report any such situations should they occur.
- **Controls regarding exports, trade and international sanctions:** Suppliers must comply with any restrictions that may apply to the exportation of goods, services and technology, as well as with any trade restrictions involving certain countries, regions, companies, entities or individuals.
- **Data protection and security:** Suppliers must respect privacy rights when it comes to the collection, withholding, use, and dissemination or any other kind of processing of personal data. Suppliers must not use or share any confidential information they may have received during their business relationship, unless they have been authorized by Gestamp to do so, they have a legal obligation to do so, or they are ordered to do so by a judicial or administrative authority.
- **Intellectual property and piracy:** Suppliers must respect the group’s industrial and intellectual property rights. Furthermore, they must ensure that there is no risk

of introducing counterfeit goods and adhere to the technical regulations of the product design process.

- **Complaints channel:** Suppliers must establish an effective mechanism for complaints and grievances, in accordance with UN Guiding Principle 31, which enables stakeholders to raise concerns regarding corporate ethics, human rights and any other matter, ensuring that this is done anonymously, confidentially and without any form of reprisal.
- **Remediation:** Suppliers must provide remediation or cooperate in remediation efforts via legitimate processes when their business activities cause or contribute to adverse environmental or social impacts.

HUMAN RIGHTS

Suppliers must respect internationally recognized human rights and ensure compliance with such rights within their organization. Suppliers must guarantee that neither they nor their business partners or suppliers are in violation of any human rights, both directly and indirectly, in the conducting of their business affairs.

- **Abolition of child labor:** Suppliers must avoid employing anyone under the age at which the obligation to attend school ceases or, in any case, anyone who is under 15 years of age for light work and 18 years of age for work that is dangerous or detrimental to health.
- **Eradication of forced labor and modern slavery:** Suppliers must avoid hiring employees against their will or under threat, particularly when this includes the use of violence or intimidation, forced debt, limitation of freedom of movement, withholding of wages, disciplinary practices and physical punishment, withholding of identity documents or threats of reporting to the immigration authorities. Employees shall be free to terminate their employment at any time pursuant to the stipulated notice period, without incurring any penalties or deductions from wages.
- **Ethical recruitment:** Recruitment agencies must not request that workers pay hiring fees, nor may they confiscate, destroy and/or deny access to passports or other documents. Furthermore, they must provide workers with a written contract or a notification of employment at the start of the contract period in a language they understand and clearly and truthfully declaring their rights and responsibilities.
- **Freedom of association and right to collective bargaining:** Suppliers must respect the right of workers to freely join or form trade unions and to seek representation in the workplace without any form of reprisal or discrimination.
- **Working conditions:** Suppliers must offer fair pay, which should enable its workers and their families to cover their needs. Moreover, they must respect the provisions of applicable legislation and sectoral regulations and avoid more than 48 hours of work per week, ensuring one day of rest per week.

- **Non-discrimination:** Suppliers must contribute to the eradication of all forms of discrimination and harassment based on race, ethnicity or caste, religion, ideology, age, nationality, sexual orientation, gender, marital or family status, social origin, disability or opinion.
- **Health and safety in the workplace:** Suppliers must commit to implementing effective health and safety policies that are adapted to the work in question and based on prevention, through specific action plans, emergency response, management of incidents and accidents, corrective actions and commitments that are applicable to all employees, including subcontractors.
They equally commit to offering their employees a safe and healthy work space, personal protective equipment, and training on occupational health and safety.
- **Rights of migrant workers:** Suppliers must ensure decent working conditions for migrant workers due to their vulnerability.
- **Rights of local communities:** Suppliers agree to not infringe on the rights of local communities in terms of their right to access basic services such as water, energy, food, their freedom of movement, housing, land use, health and education. More specifically, they will not violate the rights of native, aboriginal and indigenous peoples.
- **Security forces:** Suppliers must ensure that the security forces hired do not exercise a use of force that violates human rights.
- **Safety of products and services:** The supplier's products and services must comply with the highest health and safety standards so that they pose no risk to stakeholders, the environment, and society in general.
- **Conflict minerals:** Suppliers must comply with the laws regarding the responsible sourcing of minerals and will apply and undertake any legally required investigations in relation to minerals sourced from conflict areas. Suppliers are also required to provide the Gestamp Group with any information regarding the potential impact on human rights or the environment of the minerals included in their products. If such an impact is suspected or confirmed, steps must be identified and taken as quickly as possible to find alternative sources of supply of the minerals in question.

ENVIRONMENTAL PROTECTION

Suppliers must protect the environment and comply with environmental legislation. Furthermore, they must take a preventive approach so as to avoid having a harmful impact on natural resources and biodiversity, as well as fostering initiatives that promote greater environmental responsibility.

- **Environmental management:** Suppliers must comply with environmental legislation and implement, operate and improve their procedures on an ongoing basis, giving particular consideration to the environmental aspects. In this regard, the Gestamp Group reserves the right to require that its suppliers obtain the ISO

14001 certificate or any equivalent certificates that the Gestamp Group deems necessary.

- **Saving resources:** Suppliers must consume natural resources responsibly, which includes the consumption of water and the use of raw materials.
- **Reduction of greenhouse gas emissions:** Suppliers must monitor the greenhouse gas emissions originating from their activities and make an effort to reduce those emissions, when possible design a decarbonization plan to reduce those emissions throughout its value chain, consume renewable energy, and make efficient use of energy and fuels in general.
- **Water, air and soil quality:** Suppliers must prevent any contamination of the water, air and soil by means of continuous monitoring and reducing the use of pollutants. Should environmental damage occur, suppliers commit to allocate all the resources necessary to restore the situation to what it was prior to the events that caused the impact in question.
- **Noise:** Suppliers must monitor and control industrial noise levels to avoid sound pollution.
- **Reduction of waste and promotion of the circular economy:** Suppliers must cut down on the generation of waste at the source and encourage recycling, reuse and recovery as much as possible.
- **Responsible management of chemical products:** Suppliers must identify, minimize or eliminate the use of restricted substances in their manufacturing processes and in finished products so as to ensure regulatory compliance.
- **Biodiversity, land use and deforestation:** Suppliers must protect the ecosystems—particularly the key biodiversity areas—that are impacted by their operations, and prevent deforestation in accordance with international biodiversity regulations, including the Resolutions and Recommendations issued by the International Union for Conservation of Nature (IUCN) regarding Biodiversity.

Suppliers must set up appropriate management systems to ensure compliance with the requirements set out in this document. Here, management systems are understood to be a combination of policies, processes, duties, tools and internal controls that assist an organization in monitoring its operations, achieving objectives and ensuring continuous improvement.

Suppliers state that they have read and understand the contents of this document, and they commit to apply it in their company or group of companies, regardless of the country in which they are operating. Furthermore, suppliers commit to demand that these requirements—or those on an equivalent compliance level—be met in their own supply chain (tier-1 suppliers), with the aim of setting the highest ethical, social and environmental standards across the entire value chain, obtaining a similar commitment to what is described in this document from their own suppliers.

The Gestamp Group reserves the right to terminate the contractual relationship with any suppliers or contractors that fail to comply with the principles outlined in this document.

