

Corporate Social Responsibility Requirements for Gestamp Group Suppliers

Compliance with the requirements herein is mandatory for all Gestamp Group suppliers and their employees (jointly, the “Suppliers”) regardless of the country or territory in which said suppliers and employees provide their services, in the fields of human rights, labour regulations, business ethics, environmental protection and safety.

I. Human Rights and Labour Regulations

- **Observance of Human Rights**
Suppliers must at all times respect internationally recognised human rights and promote and oversee compliance with them within their organisations. Suppliers must ensure that neither they, their business partners nor their suppliers directly or indirectly violate any human rights in the course of their business activities.
- **Abolition of Child Labour**
Under no circumstances shall child labour be allowed. Suppliers must comply with applicable domestic regulations in this regard or the ILO’s conventions on minimum employment age, if the latter is stricter.
- **Free Choice of Employment**
Suppliers must respect their employees’ freedom to terminate their employment relationship as regulated by law and their contract. Suppliers must under no circumstances resort to forced or compulsory labour. For these purposes, labour is deemed to be forced when it is imposed by means of violence or threats or, more generally, when a person is unwillingly bound to an employment relationship.
- **Freedom of Association and the Right to Collective Bargaining**
Suppliers must observe their employees’ right to associate freely, join labour unions and seek labour-related representation. Suppliers undertake to respect union independence and pluralism, under the terms set forth in applicable regulations.
- **Fair remuneration and Benefits**
Suppliers must comply with applicable regulations in the relevant territory and industry in terms of salary and wage benefits for their employees.

- **Working Days**
Suppliers shall meet the requirements of applicable legislation and industry standards, or relevant ILO conventions, if the latter are stricter.
- **Ban on Discrimination**
Suppliers must foster the eradication of all forms of discrimination based on race, religion, age, nationality, sexual orientation, gender identity, marital status, family circumstances or disabilities
- **Health and Safety in the Workplace**
Suppliers agree to implement effective, task-specific health and safety policies based on prevention in the form of specific action plans and commitments applicable to all employees regardless of their role in the company.

II. Business Ethics and Compliance

- **Compliance with the Law and the Code of Conduct**
Suppliers must at all times abide by the laws and regulations applicable to their activity and business relationship with the Gestamp Group. They must also comply with the provisions contained in the Gestamp Group Code of Conduct.
- **Free Competition**
Suppliers shall especially observe antitrust laws and regulations protecting free competition, and they shall refrain from collusive or anti-competitive conduct and, in general, any practices that are prohibited pursuant to such legislation.
- **Preventing Corrupt Practices**
The Gestamp Group expects the highest level of integrity from its Suppliers in all their business activities and relationships. Suppliers must refrain from any and all forms of fraud or disloyalty, from insolvency offences, and from corrupt practices, influence-peddling and similar conduct. In particular, Suppliers must strictly avoid offering or accepting any kind of inappropriate payment or bribery of or by public officials, private entities or individuals.
- **Avoiding Conflicts of Interest**
Suppliers must implement strict standards on negotiations with third parties, including but not limited to business partners, and must demand compliance within their organisations. These standards must pursue and establish decision-making mechanisms based solely on the company's interests, preventing decisions from being influenced by the personal interests of the company's employees.
- **Managing and Safeguarding Data Privacy**
Suppliers must use only legitimate methods to obtain the personal data they process, strictly complying with the regulations in this regard. Suppliers must keep and process the personal data solely for the purposes for which the data subjects have granted authorisation.

- **Protecting Intellectual Property**

Suppliers must protect the Gestamp Group's intellectual property rights with at least the same degree of diligence as they protect their own and, in all cases, with a reasonable degree of diligence in line with industry standards. Suppliers must not infringe the intellectual property rights of the Gestamp Group or any third parties.

III. Environmental Protection

- **Environmental Management**

Suppliers must comply with environmental laws, and implement, operate and continuously improve their procedures, taking environmental issues specially into account. To this end, the Gestamp Group reserves the right to require its suppliers to obtain ISO 14001 certification, or any kind of equivalent certification that the Gestamp Group deems appropriate.

- **Reducing Greenhouse Gas Emissions**

Suppliers must monitor the greenhouse gas emissions resulting from their business activities, they shall strive to reduce these emissions and endeavour to use energy efficiently.

- **Preventing Air, Water and Soil Pollution**

Suppliers must prevent pollution of the air, water and soil through continuous monitoring and reducing the use of pollutants.

- **Saving Resources and Reducing Waste**

Suppliers must use proper waste disposal and recycling management systems and strive to reduce water consumption as well as the amount of final waste disposed of by using resources effectively.

- **Managing Chemicals**

Suppliers must disclose any potentially contaminating or hazardous chemicals they use and must handle them correctly. They must not include illegal chemicals in their products or use them in manufacturing processes.

IV. Others

- **Responsible Procurement of Minerals**

Suppliers must comply with laws regarding responsible procurement of minerals and implement and conduct any investigations required by law in relation to conflict minerals. Suppliers must inform the Gestamp Group of any information about the potential impact of the minerals included in their products on human rights or the environment. If any impact of this kind is suspected or confirmed, they must identify and deploy actions for alternative sourcing of the relevant minerals as soon as possible.

The principles and requirements contained herein are developed and regulated in detail in the Gestamp Group's policies and codes, which are available through the links below:

1. Code of Conduct:
<https://www.gestamp.com/About-Us/Vision-Corporate-Principles/Code-of-conduct>
2. Sustainability Policy:
[https://www.gestamp.com/Gestamp11/media/GestampFiles/Sustainability/Politics/EN/Sustainability-Policy-\(pdf\).pdf?ext=.pdf](https://www.gestamp.com/Gestamp11/media/GestampFiles/Sustainability/Politics/EN/Sustainability-Policy-(pdf).pdf?ext=.pdf)
3. Health and Safety Policy:
[https://www.gestamp.com/Gestamp11/media/GestampFiles/Sustainability/Commitments/Health%20and%20safety/Healthy-Safety-Policy-at-Gestamp-\(pdf\).pdf](https://www.gestamp.com/Gestamp11/media/GestampFiles/Sustainability/Commitments/Health%20and%20safety/Healthy-Safety-Policy-at-Gestamp-(pdf).pdf)
4. Environmental Policy:
https://www.gestamp.com/Gestamp11/media/GestampFiles/Sustainability/Environment/Environmental%20management/Environmental_Policy.pdf?ext=.pdf
5. Conflict Mineral Policy:
<https://www.gestamp.com/Gestamp11/media/GestampFiles/Sustainability/Politics/EN/Conflict-Minerals-Policy-FINAL.pdf>
6. Gift and Hospitality Regulations:
<https://www.gestamp.com/Gestamp11/media/GestampFiles/Sustainability/Politics/EN/Regulation-Gifts-and-tokens-of-appreciation.pdf>
7. Anti-corruption and Anti-fraud Policy:
https://www.gestamp.com/Gestamp11/media/GestampFiles/Shareholders%20Investors/Corporate%20Governance/Corporate%20Policies/Pol%c3%adtica%20anticorrupci%c3%b3n%20y%20fraude/2018_12_17-Politica-anticorrupcion-y-fraude-EN-vfinal.pdf?ext=.pdf

Compliance with the documents above is mandatory for the Gestamp Group's Suppliers. In the event of any discrepancy between this document and the corresponding code or policy, the latter shall prevail.

Suppliers hereby declare that they have been informed of the preceding text and agree to apply its terms in their company or corporate group, regardless of the country in which they operate. Suppliers also agree to demand similar commitments to those contained herein from their own suppliers.