



Conflict Minerals Policy

16 December 2025

| Version | Issued by | Supervisor | Approved by | Company | Approval date |
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| 1.0- Conflict Minerals Policy | Corporate Procurement Department. | | | GESTAMP AUTOMOCIÓN, S.A. | November 2014 |
| 2.0- Conflict Minerals Policy | Corporate Purchasing Department and ESG Department | Sustainability Committee | Board of Directors | GESTAMP AUTOMOCIÓN, S.A. | 16 December 2025 |

1. Introduction

International regulations on conflict minerals have evolved to ensure that the extraction and trade of minerals classified as conflict minerals, specifically tin, tantalum, tungsten and gold (3TG), do not finance armed conflicts or contribute to human rights violations. In addition, other minerals such as cobalt, copper, mica, nickel, lithium and graphite, commonly referred to as extended minerals under broader regulatory and industry frameworks, are increasingly subject to comparable due diligence expectations throughout global supply chains.

In the United States, the Securities and Exchange Commission (SEC) approved the final regulation on the extraction of "conflict minerals" in Section 1502 of the Dodd-Frank Act, that requires publicly listed companies to disclose whether their products contain 3TG minerals sourced from the Great Lakes region of Africa. To date, Section 1502 remains in force, which means that companies filing with the SEC under the Exchange Act must file Form SD and, when applicable, include a Conflict Minerals Report as an exhibit.

This matter has been also addressed by initiatives carried out by the European Commission and the OECD. The European Commission's original proposal (COM 2014/0111) dated 03 March 2014) was adopted as Regulation (EU) 2017/821 of May, 2017, laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold from conflict-affected and high-risk areas; the mentioned Regulation entered into force in 2017 and has applied since January 1st, 2021. The OECD, for its part, issued the Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, 2016), which, in the "conflict minerals" context, is the non-binding core reference that remains in effect, alongside ongoing complementary materials and updates to support implementation.

More recently, the European Union has expanded the scope of responsible business conduct through the adoption of the Corporate Sustainability Due Diligence Directive (CSDDD) — Directive (EU) 2024/1760, which entered into force on 25 July 2024. This directive establishes mandatory human rights and environmental due diligence obligations for large EU and non-EU companies operating in the Union. It complements sector-specific frameworks such as Regulation (EU) 2017/821 on conflict minerals, extending due diligence requirements beyond the minerals sector to cover a broad range of environmental and human-rights risks throughout global value chains. Member States must transpose the directive into national law by 26 July 2027, after which its obligations will apply progressively according to company size and turnover thresholds.

2. Scope of application

This Conflict Minerals Policy (the "Policy") is global in nature and applies to Gestamp Automoción S.A. and its controlled subsidiaries ("Gestamp", or the "Group") in all the geographical areas in which it operates.

3. Purpose of the Policy

While Gestamp is not a publicly traded company in the United States, some of its customers are. As a result, the company is occasionally required to share information regarding its sourcing practices.

Gestamp acknowledges the relevance of responsible sourcing and is committed to aligning its practices with internationally recognized standards in this area.

In general, Gestamp's suppliers must meet stringent quality requirements, and they must also respect human rights, labour laws, and environmental and ethical requirements in accordance with the principles of the Global Compact and Gestamp's Code of Conduct.

4. Commitment

In order to ensure that Gestamp avoids knowingly use Conflict Minerals, the Group undertakes to:

- Adopt and enforce this Conflict Minerals Policy in all Group companies.
- Make commercially reasonable efforts to ensure that this Policy is effectively communicated and implemented across its supply chain.
- Maintain a process for requesting information from our suppliers based on the guidelines and reporting templates of the Responsible Minerals Initiative (RMI). The selection of suppliers from whom information is requested depends on the type of products or services provided.
- Report upon request from our customers any information regarding the presence of conflict minerals in the supplied products.

In accordance with international reference frameworks and the company's Code of Conduct, Gestamp has developed a set of processes to ensure the proper management and transparency of information related to conflict minerals.

Additionally, Gestamp supports industry-wide efforts to improve traceability, transparency, and responsible sourcing practices in relation to conflict minerals. The Group aligns its approach with internationally recognized frameworks, such as the OECD Due Diligence Guidance and the initiatives led by the Responsible Minerals Initiative (RMI).

Gestamp actively participates in these industry initiatives, which contribute to improve supply chain accountability. This expectation is also reflected in the [ESG Requirements for Suppliers](#).

5. Risk Assessment & Mitigation

In line with our commitment to avoiding the known use of conflict minerals, Gestamp has implemented a series of actions aligned with the OECD Due Diligence Guidance for Responsible Business Conduct. This process includes the following actions:

- Embed responsible conduct into policies and management actions:
 - Periodic review of the Conflict Minerals Policy and update when necessary. The Policy is publicly available on the website and attached in different internal procedures (like Procedure for responding to Conflict Minerals Request).

- Implement a process for collecting supplier information, whereby direct material suppliers who physically deliver goods are required to complete the industry-standard templates used in the automotive sector: the CMRT (Conflict Minerals Reporting Template) and the EMRT (Extended Minerals Reporting Template), both provided by the Responsible Minerals Initiative (RMI).
- Establish an internal procedure to respond transparently to information requests made by our customers.
- Identify and assess adverse impacts in operations, supply chains & business relationships.
 - Creation of a conflict minerals working group within the company, aimed at periodically reporting the response status of our suppliers regarding conflict minerals.
- Prevent or mitigate the adverse impacts.
 - Support or collaborate with suppliers in case of detecting non responded questionnaires.

6. Expectations for suppliers

Gestamp expects its suppliers to comply with all applicable laws and regulations concerning the responsible sourcing of minerals.

Suppliers must:

- Undertake any legally required investigations related to the origin of minerals used in their products.
- Inform Gestamp of any potential human rights or environmental impacts associated with these minerals.
- Take prompt corrective actions, including identifying and transitioning to alternative sources, if such impacts are suspected or confirmed.
- Report in a timely manner on matters related to Conflict Minerals through the communication channels and formats established by Gestamp.

Supplier compliance is monitored, where suppliers are required to acknowledge and adhere to Gestamp's ESG Requirements.

Gestamp reserves the right to ask its suppliers to provide additional evidence regarding Conflict Minerals in their supply chains. It expects suppliers to maintain this traceability data for five years and to submit this information to Gestamp should the latter so request.

7. Channels for stakeholder communication, participation and dialogue

Gestamp recognizes that effective training and communication are essential to ensuring responsible sourcing practices across the organization and its supply chain. To this end, the Group has implemented a formal procedure that is communicated to all relevant internal stakeholders and employees involved in conflict minerals reporting.

Training resources have been made available to guide employees in responding to conflict minerals-related inquiries. A consultation channel has also been established via the Purchasing Sustainability and ESG email contacts to provide ongoing support.

All relevant stakeholders have access to this Policy. Supplier engagement is reinforced and suppliers are expected to comply with the provisions outlined in [Gestamp's ESG Requirements for Suppliers](#), including those related to responsible mineral sourcing, human rights, and environmental impact.

In order to respond communications regarding potential breaches of the Code of Conduct or other internal regulations and applicable legislation, including matters related to conflict minerals, as well as to receive suggestions, inquiries or concerns, Gestamp provides a dedicated whistleblowing hotline.

This channel is available to employees and people linked in any way to the Group (employees, clients, suppliers, collaborators, partners, shareholders and investors and local communities, among others) and is known to all of them because information about the channel is provided in the mandatory training on the Code of Conduct given to all employees.

The reports are analysed and investigated as quickly as possible, applying the principles of confidentiality, non-retaliation and protection of personal data to all those involved in the investigation process, with a focus on the whistleblower and accused party. If an infringement is proven, the corresponding sanction shall be imposed by the competent internal bodies.

8. Approval and implementation

This Policy has been approved by the Company's Board of Directors, at the proposal of the Sustainability Committee. Any amendments to the Policy will require the oversight of the Sustainability Committee and approval of the Board of Directors.

The Corporate Purchasing Department and ESG Department will be directly responsible for implementation of this Policy throughout the organisation under the supervision of the Sustainability Committee of the Board of Directors.

You may contact the Gestamp Corporate Purchasing Department (purchasingsustainability@gESTAMP.com) and ESG Department (GestampESG@gESTAMP.com) if you have any questions or suggestions or need any clarifications related to this document.