

Human Rights Policy

November 4th, 2025



1. Introduction and Purpose

Gestamp is committed to respecting the human rights that are recognized in international frameworks in all its work and in all the markets in which it operates.

To this end, it establishes basic operating principles that are applicable to both its direct and indirect activities as well as a due diligence system to prevent, mitigate and correct any possible negative impact on human rights.

2. Scope

This policy applies to all employees of the Gestamp Group, as well as subcontractors, suppliers, partners and collaborators, in compliance with the United Nations Guiding Principles on Business and Human Rights.

In countries where national legislation is in conflict with human rights compliance, we will establish the risk control and mitigation measures required to ensure a minimum standard of human rights, without breaching the legislation in force.

3. Human Rights at Gestamp

3.1. Definition of Human Rights

Human rights are rights and freedoms inherent to all human beings that guarantee that they can live with dignity, justice, peace and freedom in any country in the world. They are universal rights since they apply to all people regardless of race, sex, religion, nationality, culture or any other condition. Additionally, these rights are interconnected and interdependent.

3.2. Frameworks of reference

Gestamp respects the rights established in:

- the United Nations International Bill of Human Rights, which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.
- the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its core standards
- the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises
- the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy
- the UN Guiding Principles on Business and Human Rights and the UN Global Compact
- the United Nations Global Compact
- National legislation- In the event national regulations conflict with an international framework, the more stringent one should be followed.

4. Due Diligence

In accordance with established international frameworks and its own Code of Conduct, Gestamp establishes a due diligence process that enables it to identify the real and potential risks of violating human rights that may result from Gestamp's regular business activities. This process:

- Implements a procedure to find, assess and prioritize risks related to human rights
- Establishes the prevention, mitigation and corrective measures required to minimize the consequences and likelihood that these risks occur and to prevent the company's involvement in the event that these rights are violated.
- Promotes human rights awareness throughout the value chain.
- Makes a whistleblower channel available to all stakeholders so that they can communicate any questions or concerns related to human rights issues.
- Corrects adverse human rights impacts arising from the company's direct and indirect activities by establishing effective corrective measures.
- Publicly communicates the measures established to prevent and mitigate the potential violation of these rights, as well as the possible detection of these events.
- Periodically reviews internal due diligence processes,

5. Principles of conduct

Gestamp establishes the following minimum human rights principles as company guidelines in its relationships with employees, suppliers, subcontractors, partners, customers and the communities with which it interacts.

- **Prohibition of child labor.** The employment of anyone under the age at which the obligation to attend school ceases or, in any case, anyone who is at least 15 years old for light work and 18 years old for work that is dangerous or detrimental to health must be strictly avoided. As a general rule, compliance with applicable national regulations in this regard or, if these are less stringent, with ILO conventions on minimum working age must be ensured.
- **Eradication of forced labor, human trafficking and modern slavery.** Hiring employees against their will or under threat, particularly the use of violence or intimidation, forced debt, limitation of freedom of movement, withholding of wages, withholding of identity documents or threats of reporting to the immigration authorities, must always be avoided. Employees shall be free to terminate their employment relationship at any time pursuant to the stipulated notice period, without incurring any penalties or deductions from wages.
- **Non-discrimination and Harassment-Free Workplace.** Contribute to the eradication of all forms of discrimination and harassment based on race, ethnicity or caste, religion, ideology, age, nationality, language, sexual orientation, gender, marital or family status, social origin, disability or opinion. Uphold a culture of respect that promotes diversity, equal opportunity and inclusion, as well as a work environment that is free of harassment, abuse, intimidation or violence, creating an inclusive working environment for all.

Likewise, freedom of expression and the right to privacy are ensured.

- **Use of Public or Private Security Forces.** When employing security forces, Gestamp ensures they are properly vetted, trained, and monitored to prevent any risk to human rights, and adheres to international standards and principles.
- **Fair wages and benefits.** Provide employees with a salary that is equal to or greater than the legal minimum wage (according to the applicable legislation in each country), without discrimination between men and women workers for work of equal value, ensuring that it covers their needs and those of their families. In any event, employees should not be subject to salary withholdings or reductions for disciplinary reasons.
- **Respect for the work schedule.** Respect the provisions of applicable legislation and sectoral regulations or the relevant ILO conventions, if they are stricter, avoid more than 48 hours of work per week and ensure one day of rest per week.
- **Health and safety assurance.** Implement effective safety and health policies that are adapted to the job and based on prevention, through specific action plans, protective measures, training and commitments that are applicable to all employees, regardless of their role within the company.
- **Freedom of Expression and Privacy.** Gestamp respects and upholds the right of all individuals to freely express their opinions, ideas, and concerns without fear of retaliation or discrimination. The company also guarantees the protection of personal data and privacy, ensuring that all information is handled responsibly, securely, and in accordance with applicable laws and international standards.
- **Union association and collective bargaining.** Respect the right of employees to freely join or form trade unions and to seek representation in the workplace without any form of retaliatory discrimination.

In countries where trade unions are prohibited, employees may regularly hold workers' meetings to freely discuss issues related to working conditions.

- **Rights of migrant workers.** Advocate for ensuring decent working conditions for migrant workers because of their vulnerability.
- **Rights of local communities and indigenous people.** Respect the rights of local communities, ensuring their access to basic services such as land, cultural heritage, water, energy, food, freedom of movement, housing, property, land use, health, and education. Likewise, their active participation in decisions that may affect them must be ensured, through processes that guarantee their free, prior, and informed consent (FPIC). Specifically, do not violate the rights of native, aboriginal and indigenous peoples.
- **Environmental conservation.** Protect and respect the environment so that people can enjoy clean air and water, a stable climate, and healthy biodiversity and ecosystems.
- **Safety of its products and services.** Comply with the highest health and safety standards so that the products manufactured or services provided pose no risk to the environment, its end users, its stakeholders and society in general.
- **Avoid the purchase of conflict minerals.** Actively avoid the purchase, possession and use of conflict minerals or 3TG (tin, tungsten, tantalum and gold and derivatives from the Democratic Republic of Congo and surrounding areas) and other minerals (cobalt, mica, copper, nickel, lithium and graphite) from similar sources.

Likewise, Gestamp will ask its suppliers for collaboration and information on these materials with the aim of helping its customers to comply with their legal obligations.

■ **Grievance Mechanisms, Stakeholder Engagement, and Remediation**

Gestamp is committed to ensuring transparent and effective processes for identifying and addressing human rights concerns. To this end, the company will:

Grievance Mechanisms: Provide accessible, confidential, and reliable channels through which stakeholders—including employees, communities, and partners—can report concerns and seek remedy.

Stakeholder Engagement: Establish inclusive consultation processes with affected communities and workers to understand potential impacts and promote collaborative solutions.

Remediation: Implement appropriate and timely corrective actions in response to confirmed human rights violations, ensuring accountability and preventing recurrence.

6. Approval

This Policy has been approved by the Company's Board of Directors, upon request of the Sustainability Committee. Any modification of the same will require the oversight of the Sustainability Committee and approval of the Board of Directors.

Version	Issuer	Supervisor	Approving Body	Company	Date of approval
1.0	ESG Department	Sustainability Committee	Board of Directors	GESTAMP AUTOMOCIÓN, S.A.	November 7th, 2022
2.0	ESG Department	Sustainability Committee	Board of Directors	GESTAMP AUTOMOCIÓN, S.A.	November 4th, 2025

For any questions, clarifications, or suggestions related to this document, please contact the Gestamp ESG department.: GestampESG@gestamp.com