



# ESG POLICY

27 February 2024

Version	Issued by	Supervisor	Approved by	Company	Approval date
1.0- Sustainability Policy	ESG Department	Sustainability Committee	Board of Directors	GESTAMP AUTOMOCIÓN, S.A.	2011
2.0- ESG Policy	ESG Department	Sustainability Committee	Board of Directors	GESTAMP AUTOMOCIÓN, S.A.	27 February 2024

## 1. Introduction and purpose of the Policy

Gestamp Automoción S.A. and its controlled subsidiaries (“**Gestamp**”, or the “**Group**”) is a global business group composed of people from a vast range of countries who share a single corporate culture based on honesty, effort and the development of long-term projects.

Driven by the vision of being the most recognized automotive supplier for its ability to adapt its activity to create value for the customer, while maintaining sustainable economic and social development, Gestamp’s actions revolve around five corporate principles:

- The customer as the focus of the business
- Operational excellence, as standard practice
- Innovation, as the path to progress
- Sustainability, as a key to long-term stability
- People, as the architects of success.

Sustainability is therefore one of the strategic pillars that support Gestamp’s long-term vision within the automotive industry and the creation of value for its stakeholders.

All of this is embodied in this ESG Policy (the “**Policy**”), which sets forth the principles on which Gestamp builds its environmental, social and good governance (“**ESG**”) strategy and performance, which are aligned with its business objectives, company culture and the United Nations 2030 Agenda.

## 2. Scope of application

This Policy is global in nature and applies to the entire Group, including all its business activities and relations with third parties in all the geographical areas in which it operates.

## 3. The ESG approach at Gestamp

### **What does Gestamp do?**

Gestamp designs, develops and manufactures automotive components, generating employment and wealth in the business community. Through its activity, it contributes to safer and more sustainable mobility, focusing its actions on making parts lighter so as to reduce vehicle emissions throughout their life cycle and, in the case of electric vehicles, to increase their autonomy.

### **How does it do this?**

In performing its activities, Gestamp:

- Promotes an efficient use of resources.
- Promotes manufacturing parts with low-carbon processes and materials, encouraging the recycling of steel and aluminium to collaborate in the development of low-emission raw materials.
- Respects the rights of individuals along the entire value chain.

- Acts ethically and with transparency.

## 4. Principles of action

Gestamp establishes a series of principles of action in the environmental, social and good governance dimensions, with the aim of mitigating its negative impacts and enhancing its positive ones. These principles act as guidelines for the development of its activities.

Furthermore, Gestamp is well aware of the many challenges facing the mobility sector today. It is therefore committed not only to mitigating the risks to which its activity is exposed, but also to transforming them into opportunities that allow it to be more resilient and generate a competitive advantage.

- **Compliance with the highest ESG standards-** ensuring that the company is aligned with the applicable regulations, as well as with the most stringent international and sector-specific requirements.
- **Ethics and transparency as the cornerstone of the business-** generating value and wealth in the industrial fabric through integrity, ethics, responsibility, transparency and good governance. Gestamp applies these values throughout its entire business value chain.
- **Meeting stakeholders' expectations-** fostering dialogue and communication with employees, customers, suppliers, partners, investors, analysts, the media, communities and other stakeholders; to integrate through two-way communication channels, their expectations and requirements into the company's strategy with regard to its ESG performance.
- **Commitment to decarbonisation and the fight against climate change-** understanding that sustainable mobility involves the great challenge of decarbonising vehicles throughout their entire life cycle. Gestamp helps mitigate and adapt to climate change, contributes to the objectives of the European Green Deal and improves air quality by reducing its greenhouse gas emissions, promoting energy efficiency and the use of renewable energies, not only in the production phase but also by helping to reduce the carbon footprint of cars throughout their use life by making parts lighter.
- **Efficient use of natural resources-** aware that natural resources (such as soil, forests, water, etc.) are limited and their conservation is fundamental for society, the company contributes to a more rational and efficient use of these resources from the design, procurement and production phases. With its activities, Gestamp promotes:
  - Reducing the amount of raw material used.

- Efficient water use, promoting recycling and recirculation measures, ensuring proper water treatment, preventing and reducing water pollution, especially in areas prone to water stress.
- Fostering energy efficiency measures and the use of renewable energies.
- **Focus on the circular economy**- working to create circular business models in the sector, focusing on manufacturing automotive components with a high recycled material content, facilitated through the reintroduction of scrap as a secondary raw material and through Gestamp's proper waste management and recovery.
- **Biodiversity protection**- although the direct environmental impact of the company's operations is limited, Gestamp believes, due to the complexity of the supply chain in the automotive sector, that it is necessary to nurture and protect natural assets, ecosystems and biodiversity and to fight against deforestation throughout the entire value chain.
- **Respecting and protecting human rights**- by implementing a due diligence process that ensures compliance with human rights recognised in international reference frameworks across all its direct activities and identifying risks along the supply chain.
- **Nurturing people**- considering its employees a key resource, Gestamp is an industrial company that generates employment and establishes measures:
  - To attract and retain employees.
  - To foster diversity, equality and inclusion, establishing measures to prevent and mitigate all forms of discrimination.
  - For career development and continuous training.
  - For employee health, safety and well-being.

The Gestamp Group is committed to providing its employees, and the employees of third party companies that provide services at its facilities, with a safe and healthy working environment, considering that health and safety not only means having facilities and equipment in good condition, but also having committed people who respect the rules and put prevention before any other circumstance. For further information see the Group's *Occupational Health and Safety Policy*.

- **Responsible product design, manufacturing and use**- ensuring that all the automotive component development phases take into account passenger safety and reduced environmental impact.
- **Social contribution**- collaborating to generate a positive social and environmental impact for society as a whole, and especially in the local communities where Gestamp has a presence, placing at their disposal its human, technical and financial resources, focusing on

three strategic pillars ((i) education, (ii) mobility and transport, and (iii) the environment) that respond to the provisions of the Group's Social Action Policy.

- **Sustainability and digitalisation-** basing the sustainability strategy on the opportunities afforded by digitalisation and new technologies, using traceability as a key element in data sharing across the value chain. Furthermore, Gestamp boasts a software development strategy with a high degree of alignment to the Green Software carbon footprint standard.
- **Collaborative value chain-** supporting customers and conveying the highest ESG standards and commitments to suppliers, to achieve a value chain aligned with the sustainability principles, and participating in the creation of a collaborative ecosystem in the automotive sector, geared towards an industry:
  - That is more efficient in the use of resources and waste management, less polluting, more respectful of biodiversity, decarbonisation and the circular economy;
  - That respects human rights, focuses more on people and supports social projects that improve the lives of communities;
  - That uses technology responsibly, generates an economic impact ethically and responsibly, is transparent and follows good governance standards.

Some of the Group's policies and standards linked to the principles of action mentioned above are:

- *Code of Conduct*
- *Internal Reporting System Policy.*
- *Internal Reporting System Procedure.*
- *Human Rights Policy*
- *Occupational Health and Safety Policy*
- *Environmental Policy*
- *Social Action Policy*
- *Global Equality, Diversity and Inclusion Policy*
- *Global Hiring Policy*
- *Global Training and Development Policy*
- *Compliance Policy*
- *Anti-Corruption and Anti-Fraud Policy*
- *Third Party Due Diligence Policy*
- *ESG Requirements for Suppliers*
- *Policy on the communication of economic-financial, non-financial and corporate information and on contact with shareholders, investors and proxy advisers*

## 5. Monitoring performance in the implementation of the principles, associated risks and their management

The Sustainability Committee, in accordance with article 42 of the Regulations of the Board of Directors of Gestamp, is responsible for proposing, supervising, reviewing and ensuring compliance with sustainability policies regarding environmental, social and corporate governance matters. In this regard, with the assistance of the Group's ESG Department, the Sustainability Committee supervises that the Company's environmental, social and corporate governance practices are aligned with the Group's strategy and policies.

On the other hand, in accordance with article 40 of the Regulations of the Board of Directors of Gestamp, the Audit Committee is responsible for periodically supervising, assessing and reviewing the efficacy of internal control and financial and non-financial risk management systems, so that the main risks are adequately identified, managed and reported, receiving support in this supervisory task from the Internal Audit and Risk Management Department. In supervising non-financial risks, the Audit Committee also has the support of the Sustainability Committee for all ESG-related risks.

This Policy is part of the ESG risk management process identified in the corporate risk map and complements the Comprehensive Risk Management System Policy of Gestamp approved by the Board of Directors. It is applicable to all the companies that comprise the Group and is based on the COSO ERM and ISO 31000 standards.

Gestamp is aware that ESG risks are very closely linked to the geographical location of its plants and the complexity of the value chain in the automotive sector. As such, Gestamp aims to contribute to mitigating these risks on two fronts: focusing on both the company and its stakeholders and local surroundings.

In addition to the risk management itself, which is carried out on an ongoing basis by its owners and the organisation itself, as well as the monitoring of the different indicators defined for their measurement, an annual process is performed to identify, assess and update risks, including non-financial risks, which consists of:

- Reviewing and approving the risk assessment scales: impact, likelihood and speed of occurrence, as well as the effectiveness of the controls that mitigate them.
- Updating the Corporate Risk Map of the Group.
- Implementing and monitoring plans with comprehensive or specific action measures necessary to respond to and maintain risks within acceptable risk levels.

Gestamp has also established a Criminal Risk Prevention Model, the purpose of which is to analyse and assess the risks arising from the potential perpetration of crimes within the Group, as well as to identify the necessary controls to prevent, mitigate or detect said criminal risks, including those related to ESG. In addition, in order to deal with communications in relation to potential breaches

of the Code of Conduct and other internal or external regulations applicable to the Group, Gestamp has different whistleblowing channels available to members of the governing bodies, executives and employees of any of the companies that comprise the Group and to any individual or legal entity that has had, has or may have a relationship with or interest in Gestamp.

## 6. Channels for stakeholder communication, participation and dialogue

Gestamp aims to create long-term value for its stakeholders by focusing on the way it interacts with society and the environment, seeking to create bonds and prioritising the development of direct lines of dialogue and communication to promote a cooperative space in which it is possible to express concerns. For this reason, Gestamp provides its stakeholders with various communication channels:

- **Employees:** Corporate Intranet, internal newsletters, suggestion boxes, whistleblowing channel, performance appraisal tool, social media and direct contact with the Human Resources Department at the work centres.
- **Customers:** Customer platforms, regular meetings and audits, co-designs, customer events, industry events and daily operational contact at each production site.
- **Suppliers:** Digital platform for suppliers, contractual specifications, special collaborations, recurrent meetings and direct local contact.
- **Regulatory Bodies:** Lobbying; national, international and sector-specific association events.
- **Financial Community:** Conferences, *Roadshows*, *Site Visits*, meetings, *ad-hoc* calls, questionnaires, *Capital Markets Day*, active participation in ESG *rating* assessments, reports and conference calls on quarterly financial results.
- **Civil Society and Opinion Makers:** Press releases and social media; participation in industry forums, talks and events; social action and volunteer work.

In addition to these specific channels, Gestamp also has its company website ([www.gestamp.com](http://www.gestamp.com)) and a specific e-mail for direct contact with the ESG Department ([GestampESG@gestamp.com](mailto:GestampESG@gestamp.com)).



## 7. Responsible communication practices

The honest, accurate and objective collection and presentation of financial, non-financial and other information is vital to Gestamp. Accordingly, the Group's Code of Conduct establishes the basic principles regarding the truthfulness and handling, privacy and confidentiality of information as well as the control of inside information, inter alia. These principles are also detailed in the "Policy on the communication of economic-financial, non-financial and corporate information and on contact with shareholders, investors and proxy advisers" which, in addition to developing the principles governing the Company's communication and contacts with its shareholders, institutional investors, proxy advisers and other stakeholders, aims to maximise the dissemination, access, transparency and quality of economic-financial, non-financial and corporate information, as well as information that is legally required or that may be of interest; and to define the communication channels that the Company makes available to its shareholders, institutional investors, proxy advisers and other stakeholders in order to maintain efficient, transparent and continuous communication.

## 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 ESG Department will be directly responsible for implementation of this Policy throughout the organisation, with support from the ESG Committee under the supervision of the Sustainability Committee of the Board of Directors.

You may contact the Gestamp ESG Department if you have any questions, clarifications or suggestions related to this document: [GestampESG@gestamp.com](mailto:GestampESG@gestamp.com)