



Human Rights Policy

Gestamp Automoción Group

16 December 2019

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1. Introduction

Human rights violations are a risk in today's working world, an obstacle faced by economic and social development, weaken the Rule of Law and are detrimental to the market and corporate reputation. Gestamp Automoción, S.A. ("**Gestamp**" or the "**Company**") and the companies belonging to it (hereinafter "**Gestamp Group**") are strongly committed to ensuring that the activities carried out for the purpose of business development comply with the ethical principles of its Code of Conduct, this Human Rights Policy (hereinafter the "**Policy**") and the applicable laws in all the countries in which it operates, particularly those laws and principles concerning human rights.

Gestamp Group has been a signatory of the Principles of the United Nations Global Compact since 2008, and became a partner of the Global Compact in 2011. The Global Compact is a practical framework for developing, implementing and disseminating corporate social responsibility policies and practices in the areas of Human Rights, Labour Standards, Environment and Anti-Corruption.

The purpose of this Policy is to design and establish the general guidelines for action which shall govern the daily activity of Gestamp Group and thus send out a strong and clear message against human rights violations of any kind, as well as explicitly declare Gestamp Group commitment to complying with the best international practices in this area.

This Policy develops the internal regulations concerning human rights already established in the Code of Conduct.

2. Scope of application

This Policy shall apply to the employees, executives and members of the governing bodies of Gestamp Group. Similarly, for those companies it works with but does not manage, Gestamp shall encourage this Policy to be applied in the context of its role in governing bodies.

All employees, executives and members of the governing bodies of Gestamp Group shall be expected to know, understand and comply with the provisions contained in this Policy. For this purpose, Gestamp shall share with them its commitment and principles.

In addition, the Company promotes respect for human rights among its suppliers and commercial

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partners.

3. Commitment

Gestamp is committed to respect and not be complicit in the violation of internationally recognised human rights and, particularly, those referred to in:

- (i) The International Bill of Human Rights, composed of the following instruments adopted by the General Assembly of the United Nations: The Universal Declaration of Human Rights of 10 December 1948, the International Covenant on Civil and Political Rights and its two optional protocols of 16 December 1966, and the International Covenant on Economic, Social and Cultural Rights of 16 December 1966.
- (ii) The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work adopted by the International Labour Conference on 18 June 1998.
- (iii) The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy adopted by the Governing Body of the International Labour Office in November 1977.

It shall also strictly comply with the applicable legislation, in accordance with the highest standards for ethics and professional conduct, including:

- (i) The Guiding Principles on Business and Human Rights assumed by the United Nations on 16 June 2011.
- (ii) The most recent version of the guidelines originally published in 1976 by the Organisation for Economic Co-operation and Development (OCDE) for Multinational Enterprises.
- (iii) The principles of the UN Global Compact announced at its annual meeting in 1999.

In addition, Gestamp shall assume the responsibility to protect, respect and remedy in the event of human rights violations resulting directly or indirectly from its activities, as well as to implement control processes to ensure compliance.

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4. Principles

The fundamental principles of human rights assumed by Gestamp Group in the course of its activities are listed below:

4.1. Labour principles

Fair working conditions

Gestamp Group strictly complies with the labour regulations applicable to each of the areas in which it operates and, specifically:

- to adjust salaries and work benefits to the applicable legislation in the relevant territory and business sector in order to benefit its employees as much as possible and guarantee a minimum level of social welfare;
- promote productivity but also respect for daily and weekly working hours, weekly rest periods and annual leave;
- guarantee job security for employees who go on maternity or paternity leave;
- protect personal and family privacy and employees' good name, credit, honour and reputation, and
- encourage employees' personal and professional development.

Equality and non-discrimination

Gestamp Group expressly commits to not discriminate on the basis of race, religion, sex, age, nationality, sexual orientation, gender identity, civil or family status or disability, or any other personal and/or social condition.

Likewise, it will maintain a rigorous and objective recruitment policy that exclusively focuses on the academic, personal and professional merits of candidates and the requirements of Gestamp Group. In particular, it will foster gender equality as regards access to employment and professional promotion opportunities, and will respect wage parity for similar positions.

Gestamp fosters the training of its employees. The training plans guarantee equal opportunities and professional development and actively contribute to achieving the objectives of the Group. Furthermore, promotion is based on the merit, ability and performance of individuals.

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Decent employee treatment

Gestamp Group ensures to guarantee a working environment in which mutual trust and respect prevails among employees and condemns all types of cruel or inhumane treatment, as well as any form of bullying (whether verbal, physical, sexual or psychological), threats or intimidation in the workplace.

Eradication of forced labour and other forms of modern slavery

Gestamp Group respects the freedom of its employees to terminate their professional relationship and shall under no circumstances resort to forced or obligatory labour, which encompasses all work or services demanded under threat of any type of punishment and for which said individual has not voluntarily offered their services.

Condemnation of child labour

Gestamp Group respects children's rights and, as such, condemns child labour, thus complying with the applicable legislation in the countries in which it operates and, in any case, with ILO Convention 138 on the minimum age for employment.

Health and safety in the workplace

Gestamp ensures that its workplaces respect the strictest safety and occupational health conditions, by implementing specific action plans and commitments applicable to all employees regardless of their role in the Company.

In addition, Gestamp informs its employees of the existing risk in their workplace, as well as the internal procedures and rules established to minimise and/or eliminate them.

Freedom of association and the right to collective bargaining

Gestamp Group respects the principle of freedom of association and the right of employees to decide whether or not they want to support or join a trade union or other organisations.

Gestamp respects the right of employees to choose their own representatives when such right is provided for by applicable regulations. Likewise, Gestamp works with its employees' representatives within the legal framework.

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4.2. Matters relating to the work environment

Freedom of expression and opinion of employees

Gestamp Group respects its employees' right to express, either verbally, in writing or symbolically, their worries, understanding and ideas in relation to the context and reality in which they live and encourage dialogue as a way to solve any internal differences which may occur with respect to opposing or mixed opinions.

Foster local employment

Gestamp Group contributes to the economic and social development of the communities in which it operates, by creating sources of stable employment and collaborating with local agents in matters in which it can add value.

Physical safety of employees in complicated contexts

Gestamp shall guarantee the physical protection of people involved in complicated social contexts, characterised by violent situations and conflicts which negatively impact human rights.

Decent work and rights regarding migrants

Gestamp Group understands the vulnerable status of migrants and their families, as well as their legal status and offers opportunities for development by respecting their rights and guaranteeing dignified work.

5. Non-compliance and whistle-blower channel

If there is reasonable evidence that an irregularity or an act that is illegal or against the action principles established in the Code of Conduct or this Policy has been committed, they shall inform their immediate superior (if they are an employee), or, where this is not appropriate, the Compliance Office, through the channels indicated on the corporate website.

Any questions or concerns regarding compliance with, application or interpretation of this Policy should be reported to the Regulatory Compliance Unit, by emailing corporatecompliance@gestamp.com, prior to taking any action that may constitute a breach of this Policy or applicable internal or external regulations.

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6. Monitoring and control

The Regulatory Compliance Unit and Compliance Office will be responsible for ensuring compliance with the Policy, making sure that Gestamp Group action principles against human rights violations are integrated into all of its activities.

7. Approval

This Policy has been approved by the Board of Directors of the Company and any modification thereof will require the approval of the aforementioned body.

This Policy shall be reviewed and updated whenever necessary to bring it into line with the Company's legal, corporate and financial position at all times.