



**THE ACERINOX GROUP'S
INTERNAL GUIDELINES ON
GIFTS AND INVITATIONS:
BAHRU STAINLESS SDN
BHD AND ACERINOX SC
MALAYSIA SDN BHD**

Madrid, February 8, 2022

CONTENTS:

I.	INTRODUCTION	3
II.	SCOPE	3
III.	PARTIES INCLUDED IN THE SCOPE	4
IV.	PROHIBITIONS	4
V.	MAXIMUM AMOUNT OF GIFTS AND INVITATIONS.....	4
VI.	RETURNING GIFTS AND INVITATIONS	5
VII.	REPORTING NON-COMPLIANCE WITH THE GUIDELINES	5

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I. INTRODUCTION

The Code of Conduct and Best Practices of Acerinox, S.A. and its Group companies details the principles and ethical responsibilities involved in managing the businesses and corporate responsibilities assumed by the Group's business associates.

These guidelines develop the basic principles of the aforementioned Code in relation to accepting or offering gifts and invitations for business reasons.

II. SCOPE

The purpose of these guidelines is to establish the lines of action to be followed in relation to offering and accepting gifts and invitations.

Gifts and invitations aimed at promoting the brand image of Acerinox, S.A. and of its Group companies, as well as sponsorship, are excluded from the scope of these guidelines.

A **gift** is deemed to be the donation of goods or the promise or concession of any economic or other type of benefit. This definition also includes gifts given in accordance with social norms, merchandising gifts and unusual discounts.

An **invitation** is understood to be any treatment, generally of a social nature, which is offered or received within the context of commercial relationships, including invitations to trips, meals or events.

The calculation of the value of the gift or invitation shall include all the supplementary items related thereto, as well as the sum of the parts into which the total value might be divided.

III. PARTIES INCLUDED IN THE SCOPE

The criteria and recommended lines of action contained in these guidelines are applicable to all employees, executives and directors of Bahru Stainless SDN BHD and Acerinox SC Malaysia SDN BHD, as well as their business associates (agents, intermediaries, consultants and subcontractors) whenever they act on behalf of them.

These rules must be applied in all countries, including countries where offering valuable gifts to business partners is customary.

IV. PROHIBITIONS

Gifts and invitations which breach any applicable legislation, the principles of Acerinox, S.A.'s Code of Conduct or these guidelines shall not be accepted or offered and, specifically, the following items shall not be given or received:

- Gifts in the form of cash or cash equivalents.
- Gifts from or to public officials or public employees, Malaysian or foreign authorities, auditors or their families.
- Gifts or invitations that are not customary in the market or which, due to their value, characteristics or circumstances, may reasonably be thought to have an undue effect on the course of commercial, administrative or professional relationships of Group companies, or sway decisions.
- Any contribution to political parties or organisations controlled by them.

Family members of employee(s) are strictly prohibited from receiving gifts from any external providers having financial, business or contractual dealings with Bahru Stainless Sdn Bhd or Acerinox SC Malaysia Sdn Bhd, as the gift may influence the actions of the employee in the course of performing their duties with Bahru Stainless Sdn Bhd or Acerinox SC Malaysia Sdn Bhd.

V. MAXIMUM AMOUNT OF GIFTS AND INVITATIONS

Offered or received gifts or invitations should in no case exceed the amount of 200 RM. (Ringgit Malaysia)

Gifts and invitations may be inappropriate even when below the indicated threshold if they are frequently given to or received from the same individual. Therefore, it must be ensured that frequent gifts and invitations are justified in the context of the business relationship and that their frequency is reasonable.

VI. RETURNING GIFTS AND INVITATIONS

Gifts or invitations which are considered inappropriate or have not been authorised must be returned or rejected by the recipient, and this circumstance must be communicated to the Chief Compliance Officer. If it cannot be returned, the HR department will, where possible, allocate the gift or invitation to a social cause, recording its end use in the corresponding register.

VII. REPORTING NON-COMPLIANCE WITH THE GUIDELINES

Non-compliance with these guidelines can be reported via the following channels:

- Communication to a superior, the Internal Audit Department or the Compliance Department.
- The whistleblowing channel on the corporate website: www.acerinox.com.
- Email addressed to comitededenuncias@acerinox.com.
- By post to the Whistleblowing Committee, Acerinox, S.A., c/ Santiago de Compostela 100, 28035 Madrid, Spain.
- Through the ethical channels that the Acerinox Group companies may have at local level:
 - (i) communication to the Senior Manager, Internal Audit Department or Compliance Officer;
 - (ii) corporate website reporting channel www.acerinox.com;
 - (iii) email to comitededenuncias@acerinox.com ;
 - (iv) email or courier to the Complaints Committee, Acerinox S.A., Santiago de Compostela 100, 28035 Madrid, Spain; and/or
 - (v) postal address to Chief Compliance Officer (CCO), Rodrigo Garcia-Vega Redondo, Calle Santiago de Compostela, 100 (28035) Madrid, Spain.
Email: rodrigo.garcia@acerinox.com
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Approving body: The CEO of Acerinox, S.A.

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