

The breach of these guidelines will be sanctioned accordingly.

IX. BRIBERY RISK ASSESSMENT

The Compliance Department shall conduct the bribery risk assessment on Bahru Stainless SDN BHD and Acerinox SC Malaysia SDN periodically, at least once in every 2 years, or whenever so instructed by the board of directors.

The results of the bribery risk assessment shall be documented properly and the results shall be presented to Bahru Stainless SDN BHD and Acerinox SC Malaysia SDN top management to confirm its data and action plans. The responsibilities of performing the action plans shall be allocated to the relevant department heads in Bahru Stainless SDN BHD and Acerinox SC Malaysia SDN or the relevant person in charge.

X. RELATED CRIMES

These guidelines are essentially aimed at preventing the perpetration of the crimes of bribery, corruption in business, influence peddling, and illegal financing of political parties and misappropriation of funds. These crimes will be adapted to the legal requirements in the countries where the Group operates.

XI. WHISTLEBLOWING

The Group encourages its employees and executives, as well as the third parties that have relationships with the Group, to voice their concerns with respect to the prevention of bribery, in good faith or based on a reasonable belief.

Non-compliance with these guidelines must 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 ethics channels that the Acerinox Group companies may have at 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
Tel: +34 91 398 51 05

The concerns and complaints voiced will be managed impartially and transparently protection the confidentiality of the claimant.

The Group will adequately protect good faith whistleblowers and individuals who report reprisals, avoiding any retaliation against them.

XII. EFFECTIVE DATE, REVIEW AND UPDATES

These guidelines will have effect from the date of its dissemination. They will be reviewed and updated periodically to adapt them to the changes in the activities of the Group or the applicable legislation.

Any amendments that must be made to these guidelines must be proposed by the Compliance Department and authorised by the approving body.

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Prepared by: The Compliance Department

Reviewed by: The Legal Department

Approved by: The General Secretary on behalf of the CEO of Acerinox, S.A.

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