

Compliance Policy



The Governing Body of [thyssenkrupp Materials Processing Europe S.L.](#), an organization dedicated to the longitudinal and transversal cutting of steel for shaping, with or without coating, in all its finish ranges, aware of the strategic importance of [Ethics, Regulatory Compliance, and Criminal Risk Prevention](#), establishes this Criminal Compliance Policy as an expression of its firm commitment to legality, corporate integrity, and sustainability.

This policy is part of the [Criminal Compliance Management System](#), in accordance with the requirements of the [UNE 19601](#) standard, within the framework of an organizational culture based on responsibility, transparency and continuous improvement.

Commitments and Principles of Action

The Governing Body declares its commitment and responsibility in the implementation, maintenance, evaluation and continuous improvement of the Criminal Compliance System, aimed at:

- ✔ [Promoting and consolidating a genuine Culture of Compliance](#) at all levels of the organization, as a key element in the prevention, detection and response to criminal risks and irregular conduct.
- ✔ [Fostering individual and collective responsibility](#), ensuring that every thyssenkrupp Materials Processing Europe S.L. employee understands and internalizes their active role in [crime prevention](#) through strict compliance with current legislation, especially criminal law, and adherence to corporate values.
- ✔ [Identifying, assessing, preventing and mitigating criminal risks](#) that could affect thyssenkrupp Materials Processing Europe S.L. through proactive management based on risk assessment, objective planning, controls and preventive measures, as well as the periodic review of their effectiveness.
- ✔ [Ensure effective, secure and confidential communication channels](#), including the ethics hotline, that allow reporting of possible breaches, irregularities or indications of criminal risks without fear of retaliation, protecting the whistleblower in accordance with current legislation.

✔ [Establish proportionate disciplinary measures](#) to sanction conduct that violates the law, ethical commitments or the Criminal Compliance System, applying criteria of fairness, proportionality and respect for fundamental rights.

✔ [Integrate sustainability, due diligence and a risk-based approach into criminal compliance](#), consistent with ESG principles and the Sustainable Development Goals (SDGs), strengthening the resilience and sustainability of thyssenkrupp Materials Processing Europe S.L.

thyssenkrupp Materials Processing Europe S.L. designates a [Criminal Compliance Body with authority, autonomy, independence, sufficient resources and professional qualifications](#), responsible for: Supervising, controlling and verifying the effective compliance of the Criminal Compliance Management System, Promoting training, awareness and communication actions in compliance matters, ensuring document traceability and accountability to the Governing Body and periodically evaluating the suitability, effectiveness and improvement of the system.

The Governing Body is committed to [leading by example](#) and promoting the active involvement of all staff and collaborators in compliance with this policy and in achieving the objectives derived from the Criminal Compliance System, ensuring its proper implementation, supervision and updating in the face of possible regulatory or strategic changes.

This policy will be [communicated, disseminated, understood, applied and reviewed periodically](#), maintaining its alignment with the principles of good corporate governance, criminal liability of legal entities and ethical business culture.



Jose Almonacid
CEO

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