

Compliance Policy

The Governing Body of **thyssenkrupp Materials Processing Europe, SLU**, an organization dedicated to the longitudinal and transverse cutting of steel for forming, with or without coating, in all its ranges of finishes, aware of the **strategic importance of Ethics, Regulatory Compliance, and the Prevention of Criminal Risks**, establishes this Criminal Compliance Policy as an expression of its firm commitment to legality, corporate integrity, and sustainability. This policy forms 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 for 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 tkMPE 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 tkMPE 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 tkMPE's resilience and sustainability

tkMPE 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



José Almonacid
CEO