
Anticorruption Policy

Grupo Duro Felguera



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07/09/2017	V1		Duro Felguera's Board of Directors	Master Version.
15/02/2022	V2	Internal Audit and Compliance Department	Duro Felguera's Board of Directors	Principles and behavioural guidelines are reinforced.



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1. INTRODUCTION

Corruption is a widespread phenomenon that affects both the public and private sectors and raises serious social, moral, economic and political concerns, undermines good governance, hinders development and distorts market competition. In this sense, **Grupo Duro Felguera emphasizes the prohibition of corruption in all its forms** and promotes compliance with the law in the development of this Policy, which adds to the rest of the corporate policies for developing a regulatory system that aligns the Company's strategy with the law.

This Anticorruption Policy has been drawn up in line with the main regulatory references and best practices in national and international anticorruption matters, as well as with behavioural principles and guidelines established in the Grupo Duro Felguera's Code of Conduct and in the rest of its internal regulations.

A Glossary of Terms is attached as Annex 1 to this Policy, in recognition of the diversity of definitions that may be applied to the concepts contained therein.

2. PURPOSE OF THE POLICY

The purpose of this policy is to define the guidelines for anticorruption behaviour in line with the principles and rules of conduct adopted by Duro Felguera Group in its Code of Conduct.

Thus, Grupo Duro Felguera is committed to **zero tolerance** of any conduct that could be considered acts of **corruption or bribery** both in the public sector (authorities and public officials) and in the private sector (companies, organisations, entities or individuals that do not correspond to States). Therefore, within the framework of this Policy, all of Duro Felguera's employees are expected to act with integrity and transparency in their dealings with commercial relationships, avoiding and condemning any conduct that could be considered an act of **corruption or bribery** within the **public** and **private sectors**. For the purposes of this Policy, corruption, bribery or kickbacks may be used interchangeably to refer to the conduct of these illicit practices in both the private and public sectors.

3. SCOPE OF APPLICATION

This Anticorruption Policy applies to Grupo Duro Felguera, and to all operations and/or activities carried out.

Duro Felguera's Board of Directors and the management bodies of the rest of the Group's companies are responsible for communicating this Policy and providing antibribery training to the employees and representatives of the Group ("*Tone at the top*").

Accordingly, this Policy applies to Duro Felguera Group Employees, Representatives, and Third Parties, and shall be communicated to them individually.

4. COMBATING PUBLIC AND PRIVATE CORRUPTION

Following the general principle of zero tolerance towards any form of corruption, Grupo Duro Felguera does not allow (i) the acceptance or delivery of gifts, gratuities, favours or courtesies from or to Third Parties, either in cash or in kind, or any other valuable object, unless they are of symbolic value, comply with the requirements set out in section 5.1 of this Policy and are not made with the intention of influencing the impartiality that should govern their actions; (ii) the giving or promising of cash, gifts, presents, incentives or retribution, of any kind, to public officials or authorities, national or international, without any kind of exception whatsoever.

5. GIFTS, INVITATIONS AND HOSPITALITY POLICY

5.1.- General behavioural guidelines

It is prohibited by the Code of Conduct to offer or receive gifts or entertainment to or from Third Parties within the framework of a business or commercial relationship, as this could compromise the Group's independence and fairness in those relationships. Accordingly, Employees and Representatives of the Group may only offer or accept gifts or entertainment to or from Third Parties **for lawful purposes**, subject to the following conditions:

-  Not be worth more than 300 euros.
-  The intention or purpose of the gift or invitation shall be in accordance with **normal standards of courtesy and customary business practice**, and in no case shall there be any expectation of unjustified commercial consideration or advantage.
-  They must be **appropriate and proportionate**. A gift or invitation shall be deemed to be appropriate and proportionate when it is socially acceptable, without any risk of its possible disclosure constituting social criticism.
-  The Group's promotional gifts must comply with the features inherent to such gifts in the context of commercial relations, and their amount shall not exceed the aforementioned ceiling.
-  They must adhere to the **laws and regulations in force at a given time**, both from the country that gave the gift and the country receiving it. In this sense, these guidelines are compatible with Spanish legislation, but may not be compatible with the legislation of other countries, and therefore compliance with foreign legislation must also be ensured.
-  The expenses incurred as a result of these gifts, gifts, promotional campaigns, among others, must be duly: (i) **accounted for**, according to their nature and allowing their traceability, (ii) **recorded and documented**, through the corresponding invoices, receipts and vouchers, which must include the date of the expense, its concept, the identity of the

person to whom the gift or campaign is made and the reason for its realization; and (iii) be **subject to review** as described in the following point.

5.2.- Prohibited conduct

Outside the limits described above, prohibited conduct means as follows:

- The giving or promising of **cash** or, where appropriate, cash equivalents (e.g. cheques or gift cards) to public officials or authorities, national or international, as well as the giving or receiving of cash or cash equivalents to or from Third Parties.
- Offering or giving **any kind of gift, present, incentive or retribution, of any kind, to public officials or authorities, national or international.**
- The giving or receiving of **gifts and invitations** that involve a **high economic value** that exceeds customary customs and practices, or are intended as **consideration** for an **unjustified or unlawful advantage or benefit**, in accordance with the provisions of the previous section.
- Accepting or offering gifts or invitations aimed at **favouring commercial relations in which Grupo Duro Felguera participates.**

The Employees and Representatives of the Group shall inform the Head of the Internal Audit and Compliance Department, in advance, of: (i) accepting or offering gifts or commercial and entertainment invitations that have a value greater than 150 euros and less than 300 euros; and (ii) accepting or offering gifts or commercial and entertainment invitations, when there are doubts about compliance with the requirements or conditions established in this regard in section 5.1 of this Policy. Commercial and entertainment gifts or invitations that do not comply with the requirements of the Anticorruption Policy shall be rejected and, if they have been received or given, the head of the Department of Internal Audit and Regulatory Compliance will manage the corresponding return or request to return the same.

6. TRAVEL EXPENSES

6.1.- General behavioural guidelines

Representation expenses are incurred to act on behalf of the Group, mainly in dealings with third parties. These are expenses for meals, events or any type of professional act carried out on behalf of Grupo Duro Felguera.

Any expenses of this nature may only be justified for **essentially work-related reasons**, in accordance with the specific circumstances of each case. However,

the principle of **austerity and proportionality governing the behaviour of Grupo Duro Felguera shall be observed** at all times.

During the course of our professional activity, it is common to incur expenses derived from food and possible business travel, which will be governed by the provisions of **the expenses procedure in force** in Grupo Duro Felguera.

6.2.- Prohibited conduct

Any type of offer, promise, payment or authorisation of meals and/or invitations that exceeds the ceiling established in the expenses procedure defined by Grupo Duro Felguera is prohibited.

Likewise, expenses for meals and/or invitations that **are not duly justified**, or whose justification does not correspond to essentially work-related reasons in accordance with the provisions of the **expenses procedure in force in** Grupo Duro Felguera, shall not be approved.

7. OTHER SPECIAL EXPENSES

7.1.- Charitable contributions, sponsorships, patronage and other related items

In terms of preventing fraudulent and corrupt practices, Employees and Representatives of the Group shall follow the following behavioural guidelines:

-  Contributions on behalf of Grupo Duro Felguera to charities, sponsorships and patronage must be made with **absolute transparency**, which requires that they be **formalised in documents and expressly included in the financial statements** of Grupo Duro Felguera. Further, the contribution should be formally approved by the competent person or body within the Group and by the Compliance Committee.
-  Amounts given to a charity must not be related to commercial arrangements, nor be made for the purpose of securing a contract or doing business. In addition, they must be made in the name of a non-profit organisation and not in the name of an individual.
-  Neither sponsorship nor patronage should be linked to the behavior of the beneficiary of the sponsorship or patronage, nor to acts that could be construed as **acts of promotion of a particular political party or group**.
-  If a grant is to be made to a foundation or organisation, it is important to ensure that it does not have any links to civil servants, public authorities, or political parties. Similarly, it is imperative to confirm the credibility and solvency of the subsidised entity, in particular whether it has a transparent

and reliable management system which will guarantee that the grant will be used appropriately and for its intended purpose. Regardless, the destination of the funds provided must be verified.

7.2.- Political contributions

Grupo Duro Felguera does not **have any political** ties. Additionally, Grupo Duro Felguera prohibits any type of contribution in its name and on its behalf that may be perceived as having **political implications**. Donations to political parties by legal entities are expressly prohibited in accordance with applicable legislation.

8. RELATIONS WITH PUBLIC OFFICIALS AND AUTHORITIES

8.1.- General behavioural guidelines

Public officials and authorities should be dealt with in accordance with the **principles of transparency, integrity, objectivity, impartiality, and lawfulness**.

In any case, in dealing with public officials and authorities, the following behavioural standards shall be observed:

-  Compliance with the values, principles and behavioural guidelines contained in Grupo Duro Felguera's **Code of Conduct**.
-  Refraining from acting or dealing with public officials or authorities in case of **conflict of interest**.
-  Control and verification of the **accuracy and integrity of the information** provided to Public Officials.
-  Operate with **transparency and lawfulness** in all public tenders, bids, contracting with public administrations, independent bodies, state-owned or publicly owned companies of any nationality and/or country.
-  A minimum of **two people should attend meetings** with members of Public Officials.
-  All documentation exchanged with the public sector should be properly **stored and supervised** by the person assigned for this purpose.

8.2.- Facilitation payments

Facilitation payments to public officials and authorities are **prohibited**.

Exceptionally, in the event of circumstances that pose a **threat to the health, safety or welfare** of Employees and Representatives, such a payment would not be considered a breach under this Policy if the Employee or Representative, **prior to making** the payment, notifies such circumstances by email to the head

of the Internal Audit and Compliance Department and the latter expressly authorises the payment on the grounds that there is a real danger to the health, safety or welfare of the Employee or Representative, on a case-by-case basis.

9. SCENARIOS OF CONFLICTS OF INTEREST

A conflict of interest exists when the interests of the Group may be compromised by the private interests of Employees, Representatives, or persons related to them.

Accordingly, the employees and representatives of each of the companies of Grupo Duro Felguera are required to inform the head of the Internal Audit and Compliance Department of any conflict of interest, whether real or potential, between the Group and themselves. This type of conflict of interest is defined as follows:

-  **Real conflicts:** occur when an Employee and/or Representative who is accountable for making a decision or judgement on behalf of a Group company or companies has a vested interest in the outcome of the decision or judgement. The conflict is real (actual) when this Employee and/or Representative is actually present at the time of making that decision or judgement.

Example: a Buyer has requested three quotations from suppliers. The main shareholder of one of the participating suppliers is a relative of this buyer. The conflict is real insofar as this decision-maker has to decide (selecting the supplier), and there is a particular and personal interest (choice of the relative) that will affect the decision.

-  **Potential conflicts:** occur when an Employee and/or Representative who is responsible for deciding or judgement on behalf of a Group company or companies has a particular interest that could influence the making of that decision or judgement. There is a potential conflict because the Employee and/or Representative has not yet been placed in a position where he/she is required to make that decision or render said judgement.

Example: a Buyer has a relative who is the General Manager of an important supplier. Duro Felguera Group has not yet opened a bidding process for this type of supplier but may be required to do so in the future. The Conflict is potential because the Buyer, at this time, does not have to make a decision in this respect, but in the future, it may have to make a decision and would be affected.

-  **Perceived conflicts:** occur when an Employee and/or Representative who is responsible for making decisions on behalf of a Group company or companies, although not having any particular interest that could influence the decision or judgement, is reasonably believed by a third party to have such an interest.

Example: a Buyer has requested quotations from three suppliers. The General Manager of one of these suppliers has the same surname as the

Buyer of Grupo Duro Felguera. Considering the coincidence of surnames, a third party may think that the two individuals are related. The conflict is perceived because, although they have the same surnames, they are not related.

Providing the necessary information or documentation to clarify the non-existence of the conflict of interest can be helpful in resolving perceived conflicts of interest. Even though these conflicts do not pose a real risk of corruption (as in fact, there is no link), they may negatively affect the reputation of the Group, as it could be interpreted that the Group acted unlawfully.

When determining whether there is a conflict of interest, it is understood to exist in the following circumstances:

-  Situations in which Employees and Representatives of the Group have shares, units or interests with customers or suppliers that maintain contractual or commercial relations with Grupo Duro Felguera.
-  Situations in which Employees and Representatives of the Group are related by blood or marriage up to the second degree to persons who hold positions in clients or suppliers who have contractual or commercial relations with Grupo Duro Felguera.
-  Employees and representatives of Duro Felguera engage in external activities and receive remuneration from entities that are contrary to the corporate interest of the Group.
-  Situations of hierarchical dependence or any other circumstances in which Employees and Representatives of the Group are in a position to exercise direct or indirect influence over other Employees and Representatives of the Group.
-  Any other situations where Employees and Representatives of the Group may become involved in business transactions or transactions that puts their personal interests ahead of those of the Group, or where such personal interests improperly influence, or may improperly influence, the conduct of the business relationship.

Grupo Duro Felguera shall keep a record of any case of conflict of interest (real, potential or perceived) and of the actions taken to mitigate the conflict.

10. ACCOUNTING RECORDS

10.1.- General behavioural guidelines

For Grupo Duro Felguera, **transparency** is a fundamental principle within its corporate strategy.

Therefore, the Group shall maintain an appropriate internal control system over financial information, which includes the reporting and the true and fair view of all transactions carried out in the name and on behalf of Grupo Duro Felguera.

The accounting books and records of Grupo Duro Felguera must be accurate and detailed, and inaccurate or misleading operational statements are strictly prohibited.

As a result, accurate, appropriate, and reasonably detailed documentation must be maintained to cover all transactions, and the documentation must be handled in accordance with internal information management policies.

Payments or receipts shall be subject to special control and scrutiny when: (a) are made by/to a company with which commercial relations are initiated for the first time; (b) come from or must be made into an account other than that which has traditionally been used by the company in its commercial relations with Grupo Duro Felguera; (c) must be made to/or received from an account or by an entity located in non-transparent tax havens; (d) are made by/to natural or legal persons not mentioned in the corresponding contracts; (e) are made by/to entities in which it is not possible to identify the partner, owner or beneficial owner; and (f) are extraordinary and not foreseen in the corresponding agreements or contracts.

Likewise, all payments made under the Group's contracts or commercial agreements shall be adequately justified. Payments must be made in the countries in which the business is conducted. These payments must be made by bank transfer and not in cash.

10.2 Prohibited conduct

In any case, and regardless of other concurrent circumstances, the following conduct is categorically prohibited:

-  Payments and receipts arising from commercial transactions in cash for an amount exceeding 1,000 euros or its equivalent in foreign currency.
-  The opening of **accounts not registered** by the Group.
-  Carrying out transactions for the purpose of not recording them in the books or recording them inappropriately.
-  Recording of non-existent expenditure.
-  **Incorrectly indicating the nature** of expenses in accounting records.
-  Using **forged documents**.
-  The deliberate destruction of accounting documents before the deadline stipulated by law.



- Repatriation of funds to another account or country than the country of origin.
- Making payments on behalf of Third Parties that are not expressly stated and justified in the contract signed by the parties and are not related to the business.

11. EMPLOYEES

11.1.- Process for hiring new Employees

Grupo Duro Felguera shall implement the necessary hiring procedures to guarantee the suitability of the Employees who carry out activities related to: (i) financial, administrative and accounting management; (ii) sales management; and (iii) representation of the Group before authorities and public officials. These procedures will be used to ensure that these Employees comply with the high ethical standards established by the Group, meet the minimum requirements of their positions, and are not associated with Third Parties who, due to the positions they hold within the Group, could benefit Grupo Duro Felguera's commercial relations or its dealings with Public Officials.

11.2.- Bonuses

Compensation arrangements, including salary bonuses and incentives, may encourage the participation or proliferation of corrupt practices. Consequently, Grupo Duro Felguera must establish clear and transparent policies regarding variable remuneration that will prevent its Employees and Representatives from acting in an unethical or unlawful manner.

12. THIRD PARTIES WHO MAY ACT ON BEHALF OF GRUPO DURO FELGUERA

As part of the daily operations of Grupo Duro Felguera, commercial and business relations exist with third parties, whether they are Temporary Joint Ventures (UTEs), partners, customers, suppliers, contractors, subcontractors, agents, collaborators, among others; the abovementioned Third Parties.

In particular, in the case of Third Parties that act, or may come to act, or mediate on behalf of and for the benefit of Grupo Duro Felguera, the corresponding **due diligence procedures** must be applied in accordance with the internal regulations established for this purpose.

In any case, such due diligence procedures shall be applied to Third Parties that are considered as agents, customers, business partners and any others with whom an agreement of intent is made to carry out projects or any type of business development.

Consequently, Grupo Duro Felguera will require adherence to this Policy from all Third Parties (including business partners) with which it establishes commercial relations.



When there are indications that a Third Party is likely to generate a potential risk of non-compliance with the principles and behavioural guidelines contained in this Policy, as well as with the applicable anticorruption laws, Grupo Duro Felguera will refrain from contracting or doing business with the aforementioned Third Party.

13. INCIDENT REPORTING, ENQUIRIES AND INTERPRETATION

13.1.- Responsible body

In the first instance, the head of the **Internal Audit and Compliance Department** shall be responsible for resolving any incidents or enquiries that may arise from the application and interpretation of this Policy. Whenever this department may be involved in an incident, it may be reported directly to the Chairman of the Audit, Risk and Compliance Committee, who shall forward it to the body responsible for its handling, as described in the Group's Regulations on Reporting Enquiries, Incidents and Internal Investigations.

13.2.- Ethics Line

All Employees and Representatives of the Group as well as Third Parties who have a contractual relationship with the Group are required to report, by means of the mechanisms implemented for this purpose, any act or fact that may involve possible breaches of which they are aware or suspect, as well as any enquiries they may make.

To this end, Grupo Duro Felguera provides the following channels for communication with its Employees, Representatives and Third Parties:

- The **Ethics Line** : <https://lineaetica.durofelguera.com>, through which, they may communicate potential breaches of this Policy.
- The **e-mail address**: dcn@durofelguera.com, through which they may communicate any doubts or enquiries arising from the application or interpretation of this Policy.

In this regard, the reporting of incidents and enquiries shall be governed by the provisions of the Group's Internal Enquiries, Incidents and Investigations Reporting Standard.

14. COMMITMENT TO DISSEMINATION BY THE DURO FELGUERA BOARD OF DIRECTORS AND SENIOR MANAGEMENT, AND MECHANISMS OF DISSEMINATION

Through this Policy, Duro Felguera's Board of Directors and the Employees of the Group who have the status of Senior Management, commit themselves to the fight against corruption in the public and private sector. On an annual basis, they will sign the **Declaration of Commitment** attached as Annex II.

Likewise, an effective anti-corruption system starts with proper dissemination by organisations. Hence, communication is a key element in the process of raising corporate awareness as well as in demonstrating the corporate commitment to the principles of transparency and integrity.

15. TRAINING FOR EMPLOYEES AND REPRESENTATIVES

As part of the promotion of a culture of integrity in Grupo Duro Felguera, the annual training plan will include specific training and communication activities on this Policy, as well as on the behavioural principles and guidelines established in the Code of Conduct in order to prevent unlawful conduct and conduct contrary to the Group's principles of action. In this regard, the head of the Internal Audit and Compliance Department is responsible for promoting the dissemination of the behavioural principles and guidelines contained in this Policy and in the Code of Conduct to the Employees and Representatives of the Group, through the **training and communication activities** deemed appropriate, as the case may be.

16. BREACH OF POLICY

Failure to comply with the principles and behavioural guidelines set out in this Policy shall:

-  When carried out by an **Employee**, be sanctioned according to the severity of the facts and the applicable labour regulations (Workers' Statute, applicable Collective Bargaining Agreement or other applicable), the breach of which may result in sanctions and disciplinary measures, including dismissal and/or claims for damages.
-  When carried out by a **Representative** (member of a management body of any of the companies comprising Grupo Duro Felguera), be sanctioned in accordance with the provisions of the Regulations of the Board of Directors or other applicable rules.
-  When carried out by a **Third Party**, be sanctioned in accordance with the contract signed between the parties or the legal provisions governing the relationship between them, the breach of which may give rise to resolutive and/or compensatory actions or measures.

The Employees, Representatives and Third Parties of the Group with the delivery, dissemination and/or communication of this Policy are aware that any action contrary to the provisions herein, as well as to the rules, policies, guidelines and instructions approved at any time by Grupo Duro Felguera, to the applicable regulations, in each case and at any time, and to the contractual or legal provisions applicable to them in the performance of their duties, could generate not only disciplinary liability, but also civil, administrative and/or criminal liability for which they would be fully liable.

17. PUBLICATION AND ENTRY INTO FORCE

This Policy was approved by the Board of Directors of Duro Felguera on 7 September 2017, as well as its amendment on **15** February 2022.



As a condition of corporate policy, this standard must be adhered to by all subsidiaries and countries where Grupo Duro Felguera is present and must be known and applied in all of them.

ANNEX I. GLOSSARY OF TERMS

Audit, Risk and Compliance Committee: internal body of the Board of Directors with powers to, among others, supervise the effectiveness of Duro Felguera's internal control, internal audit and risk management systems. It is also responsible for supervising and monitoring good corporate governance, transparency in corporate actions and compliance with Grupo Duro Felguera's rules of governance and the Internal Code of Conduct.

Compliance Committee: a chartered control body responsible for the periodic supervision and monitoring of Grupo Duro Felguera's Crime Prevention Model, the composition of which corresponds to that described in the Crime Prevention Manual.

Conflicts of interest: a *conflict of interest* shall be understood as any situation in which the interest of Duro Felguera or of any of the companies comprising the Group collide, directly or indirectly, with the particular interest of a specific member or of a person related to him/her.

Corruption or act of corruption: shall mean the *act of offering, promising, giving, accepting or receiving, as the case may be, an undue advantage to/by a public official or an employee/representative of a company, directly or indirectly, with the aim of obtaining an illicit advantage (e.g. from a contract, licence, favourable outcome of an inspection, judicial proceedings, etc.).*¹ Bribery is therefore a mechanism or form of corruption.

Duro Felguera: Duro Felguera, S.A.

Employees: any natural person who maintains an employment relationship with any of the companies of Grupo Duro Felguera, including all managers and persons who hold powers of organisation and control, as well as any person who provides employment services for any of the companies of the Group, regardless of their contracting regime.

Public official and/or public authority: *Public official or public authority*², whether national or international, shall mean: (i) any person holding a legislative, executive, administrative or judicial office, whether appointed or elected, permanent or temporary, paid or unpaid, regardless of that person's seniority in office; (ii) any other person performing public functions, including for a public agency or public undertaking, or providing a public service; (iii) any person connected with a public office in any public international body; and (vi) any other person defined as a *public official* in the domestic law of each jurisdiction.

¹Since there is no unified concept of what constitutes corruption, we have adopted the definitions given by the International Chamber of Commerce, the United Nations Convention against Corruption, and the OECD Convention.

²In determining what constitutes a public official under this Policy, the definition of public official provided by the United Nations Office on Drugs and Crime (UNODC) has been used as a reference.



Grupo Duro Felguera: the business group comprising Duro Felguera, as a parent company, and its subsidiaries or investees. Grupo Duro Felguera is understood to consist of all the Spanish and foreign companies that fall within the Group's consolidation perimeter according to its annual accounts.

Wrongful payments or perks: *wrongful payments or perks* shall be understood as any kind of request, delivery, acceptance or consideration, whether monetary or not, which is not duly justified or which is unlawful.

Facilitation payments: *facilitation payments* are small, unofficial and inappropriate payments made to a low-level official to initiate or expedite day-to-day administrative procedures. For example, a small payment made to immigration staff to expedite the granting of a work permit to a senior foreign manager.

The difference between a facilitation payment and payment for a more expedited service is that in the latter case it is advertised as a legitimate service with a pre-established fee, public and addressed to any interested party, which is paid transparently to the entity providing the service through the established means of payment and with the delivery of a receipt. In contrast, facilitation payment is usually made to a natural person in a concealed manner, usually in cash and without a receipt.

Due diligence: this refers to the process of investigating and gathering information on a Third Party in order to determine its actual risks and to analyse its actual economic and financial situation.

Representatives: all legal representatives of the companies comprising Grupo Duro Felguera, including the statutory directors, and those authorised to make decisions on behalf of said companies, including the de facto directors or other external governing bodies, and any natural or legal persons linked by legal relationships and/or of any nature other than employment relationships, who act on their behalf.

Head of the Internal Audit and Compliance Department: responsible for the implementation of the crime prevention plan and, in general, of the Group's crime prevention policy. Therefore, among its functions is the management of the Group's communication channels for incidents and enquiries (Ethics Line and e-mail dcn@durofelguera.com). This department is part of the Compliance Committee.

Third parties: all natural or legal persons who provide services to Grupo Duro Felguera, through a relationship other than an employment relationship and are not included in the definition of Representatives. These include, but are not limited to, suppliers, contractors, providers, manufacturers, collaborators, consultants or commercial agents, business or commercial partners.

ANNEX II. ANNUAL DECLARATION OF COMMITMENT

Grupo Duro Felguera is committed to complying with the highest ethical standards in matters of compliance, as well as to the fight against public and private corruption. Therefore, this declaration serves as an example of the commitment to the Group in the prevention of corruption and the maintenance of upright conduct. This commitment extends to the dissemination and training on the Compliance Policy, the Crime Prevention Model and their implementing regulations, especially the Code of Conduct and the Group's Anticorruption Policy.

At Grupo Duro Felguera we take our legal responsibilities extremely seriously, and therefore failure to comply with the Crime Prevention Model, as well as with other applicable internal regulations, and specifically with the Anticorruption Policy, will give rise to the implementation of the corresponding disciplinary measures, in accordance with the applicable regulations.

Therefore, it is the responsibility of each and every one of us to comply with and enforce compliance with the Compliance Policy, the Crime Prevention Model and their implementing regulations, especially the Code of Conduct and the Group's Anticorruption Policy, which govern the professional activity of Grupo Duro Felguera.

In this regard, I would like to point out that:

- I have received, read and understood the Compliance Policy, the Crime Prevention Manual (and its Annex), the Code of Conduct and the Anticorruption Policy of Grupo Duro Felguera.
- Throughout the course of my responsibilities in Grupo Duro Felguera, I have faithfully complied with these regulations.
- I have communicated the Compliance Policy, the Crime Prevention Manual (and its Annex), the Code of Conduct and the Anticorruption Policy of Grupo Duro Felguera to my direct subordinates and I have asked them to comply with them faithfully in the development of their activities.
- If I have become aware of any situation that may conflict with compliance with the above documents, I have duly communicated this fact to the head of the Internal Audit and Compliance Department.

Date: _____

Mr/Ms/Mrs [*] _____