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DESARROLLO

1. Purpose

The purpose of this Corporate Social Responsibility (CSR) Policy is to take into consideration the effects of business activities on all those who are directly or indirectly affected by them, namely: customers, employees, suppliers, companies, shareholders, local communities, institutions and future generations.

2. Scope of application

This Policy is mandatory and is applicable globally and directly to all the companies that make up the METAL GROUP - regardless of their geographical location - and is binding on all their personnel, regardless of the position and function they hold.

Compliance with this Policy is also obligatory for individuals and/or legal entities related to the METAL GROUP, insofar as applicable, who, where applicable, must undertake in writing to comply with it.

In accordance with the Policy, the METAL GROUP may develop procedures and instructions to implement and comply with the obligations assumed, as well as to adapt it to the various local legislations applicable to the Group.

3. Content of the Policy

3.1. General principles

The METAL GROUP's commitment to society can be summarized in four areas of action:

- ✓ Respect for ethics, integrity and professionalism in the Group's relations with its Stakeholders.
- ✓ Respect for the economic, social and environmental surroundings.
- ✓ Promotion of innovation and research in the application of its processes.
- ✓ Creation of employment and well-being, as an economic engine for society.

3.2. Concept of CSR

For the purposes of this policy, Corporate Social Responsibility is a strategic commitment acquired by companies that seek to achieve their business objectives, complying with their legal and contractual obligations, and applying social and stability criteria in their relations with their stakeholders, thus contributing to the satisfaction of their needs and expectations.

This commitment is voluntary and seeks to ensure that companies are in balance with respect to three fundamental pillars: social well-being, sustainable economic growth, and responsible use of natural resources and the environment.

3.3. Basic principles of action

The METAL GROUP's basic principles of action in relation to its stakeholders and the environment are based on compliance with the national and international laws and regulations in force in the countries in which it operates, as well as compliance with the international commitments related to corporate social responsibility, signed voluntarily. Furthermore, it undertakes to carry out all its activities in accordance with the fundamental principles of information transparency, ethics and integrity.

a) Transparency of information

METAL GROUP is committed to complete rigor in the information it transmits, always respecting the interests of customers and the rest of the organization's social partners.

This general objective of transparency is articulated through the following guidelines:

- ✓ Transmitting to the outside world the corporate strategies and those specific to each business area of the organization.
- ✓ Projecting the business reality, so that the Group's different audiences recognize it as a solid and well-managed group inside and outside Spain.
- ✓ To contribute to the configuration of a positive corporate image, which helps to achieve business objectives and commercial action.
- ✓ To maintain a fluid relationship with the different interlocutors of the organization.

METAL GROUP manages its commitment to transparency towards its stakeholders through the corresponding departments and the Group's website.

b) Ethics and Integrity

METAL GROUP is committed to promoting, reinforcing and controlling issues related to ethics and integrity, through measures to prevent, detect and eradicate bad practices. The organization promotes awareness of the general principles of conduct, ethics and integrity among all employees, customers, suppliers and subcontractors.

c) Conflicts of Interest

Professional decisions and actions must be based on the benefit of the METAL GROUP and must not be motivated by personal considerations or relationships.

Any non-compliance with this aspect, as well as any doubt that may arise on the occasion of its application or interpretation, must be reported to the Metal Group Compliance Body through its whistle-blowing channel, by e-mail to the following address: canaletico@metalgroup.es.

The Compliance Body may act on its own initiative or at the request of any employee, manufacturer, supplier or third party with a direct relationship and legitimate commercial or professional interest, by means of a complaint made in good faith. In any case, the information transmitted through this channel is confidential, as is the identity of the bona fide whistleblowers against whom METAL GROUP will not take reprisals under any circumstances

3.4. Specific principles of action

3.4.1. Customers

The METAL GROUP's commitment to customers is based on a clear strategy based on the following points:

- ✓ Orientation towards problem solving.
- ✓ Feedback on the relationship with the customer.

- ✓ Information on METAL GROUP capabilities.
- ✓ Identification of future needs and opportunities for collaboration.
- ✓ Search for the best technical and economic solution for the customer.
- ✓ Responsible use of information, thus guaranteeing customer confidentiality.

The contracting departments are responsible for their management, promoting the following aspects:

- ✓ Follow-up of the client's needs.
- ✓ Periodic measurement of customer satisfaction.
- ✓ Anticipation in the knowledge of customer needs.

3.4.2. Employees

The basic principles of action are:

- ✓ Integrity: METAL GROUP promotes among its employees the recognition of behaviour in accordance with the ethical principles of good faith, which are manifested in loyalty to the company and defence of the Group's interests; compliance with the laws in force; probity in management and prohibition of bribery and corruption; avoidance of any type of conduct and procedure against unfair competition and commitment to confidentiality. Likewise, the Group's commitment to the tax regulations in force is established, avoiding the concealment of relevant information, the illegal avoidance of tax payments or the obtaining of undue tax benefits.
- ✓ Professionalism: METAL GROUP's employees and managers must stand out for their high level of professionalism based on efficient performance and focused on excellence and quality of service. In this sense, their behaviour must be based on the principles of quality and innovation of their products and services; customer orientation; efficient use and protection of company assets; establishment of stable relationships based on trust and mutual benefit with collaborating companies and suppliers and commitment to information transparency.
- ✓ Respect for People and the Environment: METAL GROUP is committed to acting in accordance with the United Nations Global Compact. In this sense, all actions of the METAL GROUP and its employees shall scrupulously respect the Human Rights and Public Freedoms included in the Universal Declaration of Human Rights, and therefore the relationship between the Group and its employees, as well as between employees themselves, is based on the following commitments:
- ✓ Promotion of the professional and personal development of all its employees, ensuring equal opportunities.
- ✓ Non-discrimination on grounds of race, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political or trade union opinions, religion or any other personal, physical or social condition.
- ✓ No person shall be forced to perform work against his or her will and workers shall be paid a fair wage in accordance with the laws in force at any given time.
- ✓ All persons should be free to associate freely; to belong to trade unions and to participate in negotiations with the company.
- ✓ Working hours must be regulated in accordance with the law so that employees can reconcile work and private life.
- ✓ METAL GROUP will apply the utmost caution when safeguarding information and personal data with the aim of guaranteeing its confidentiality and integrity, implementing the necessary technical and organizational measures with regard to the custody, storage and conservation of data and with the aim of preventing its alteration, loss, unauthorized processing or access, all in accordance with current legislation on intellectual property, trade secrets and the protection of personal information.
- ✓ METAL GROUP shall at all times comply with applicable international, national or local regulations regarding financial controls, export controls, fair competition and anti-trust and counterfeit parts.

- ✓ Our partners and collaborators must respect human rights without diminishing the state's obligation to protect them. These rights include the protection of child and youth labour as well as non-discrimination on the basis of gender, ethnicity, race, age, etc. And to establish a specific policy for cases of harassment.
- ✓ Group companies are committed to maintaining a training policy for the learning and personal and professional development of their employees.
- ✓ Commitment to health and safety at work, providing its employees with a safe and stable environment, permanently updating occupational risk prevention measures and respecting the applicable regulations in this area in all the places where it carries out its business activities.
- ✓ Eradication of child labour.
- ✓ Eradication of forced labour.
- ✓ Respect for the rights of minorities.

3.4.3. Suppliers

The purchasing department manages the relationship with suppliers and contractors, and defines management and control processes, detailed according to operational needs, including the following points:

- ✓ Existence of specific rules and systems for the management, classification, approval and risk control of suppliers and subcontractors.
- ✓ Analysis of the level of compliance with these systems.
- ✓ Promoting collaboration with suppliers and transparency in contractual relations.

All Group employees who participate in selection processes for contractors, suppliers and external collaborators have the obligation to act impartially and objectively, applying quality and cost criteria and avoiding the collision of their personal interests with those of the company.

3.4.4. Environment

METAL GROUP combines its business objectives with environmental protection and the appropriate management of the expectations of its stakeholders in this area. METAL GROUP's environmental policy defines the general principles to be followed, including the elements of policy and planning developed and complying with the requirements of the ISO 14001 Standard. Within these principles, the following is established:

- ✓ Commitment to compliance with legislation.
- ✓ Commitment to pollution prevention.
- ✓ Commitment to continuous improvement.
- ✓ Commitment to transparency, communication and training of Group employees, suppliers, customers and other stakeholders.
- ✓ Promote the reduction of greenhouse gas emissions that contribute to minimising our footprint on the environment, as well as making efficient use of energy.
- ✓ Ensure that the maximum possible percentage of the energy consumed comes from renewable energies.
- ✓ Make rational and sustainable use of water, managing the risks related to water scarcity and ensuring that the water used is returned to the environment in the desired condition.
- ✓ Ensure compliance with applicable legal requirements to maintain air quality.
- ✓ Make responsible use of all natural resources and promote the reduction of waste generated.
- ✓ Make responsible use and management of all chemicals used.

3.4.5. Quality

For METAL GROUP, quality is a differentiating factor compared to the competition in the sector, promoting:

- ✓ The periodic establishment of quality objectives and the evaluation of their fulfilment.

- ✓ The development of initiatives and actions aimed at improving the quality of the services provided.
- ✓ Carrying out specific collaboration activities with suppliers and subcontractors to improve quality.

3.4.6. Innovation

METAL GROUP, through its commitment to technological development, responds to the growing demand from customers and society for improvements in processes, technological advances and service quality. The management system is at the service of the general research strategy of each of the companies which, despite their specific characteristics, promote the following lines of action:

- ✓ Development of strategic lines of research.
- ✓ Strategic collaboration with external organizations.
- ✓ Responsible investment, with the aim of promoting research and generating operational techniques in a constant and efficient manner.

3.4.7. Social Action

Commitment to the improvement of society is part of the METAL GROUP's objectives. In order to contribute to this objective linked to its business strategy and generate real shared value for all stakeholders, it seeks to promote the following objectives:

- ✓ Favoring the momentum of the business and its sustainability. Improve the company's recognition and reputation.
- ✓ Increase employee and collaborator satisfaction.
- ✓ Contribute to the improvement of the society in which METAL GROUP operates.

4. Communication of the Policy

This Policy shall be available on the Website and the App for all employees and shall be made available to all of the Company's stakeholders. The Policy will also be the subject of appropriate communication, training and awareness-raising activities to ensure that it is properly understood and put into practice.

5. Implementation of the Policy

METAL GROUP undertakes to allocate specific resources to ensure the effective implementation of the Policy.

6. Updating and reviewing the Policy

The Policy will be reviewed and updated when appropriate, in order to adapt it to changes that may arise in the business model or in the context in which the Group operates, guaranteeing at all times its effective implementation.

Antonio Román Molina
C.E.O

In Abadiano, 30th of March 2022

CUADRO DE REVISIONES				
DETALLE DE REVISION	REVISION	FECHA	REVISADO	APROBADO
Edición inicial	00		SISTEMAS	C.E.O.

