

MODERN SLAVERY STATEMENT GESTAMP ETEM AUTOMOTIVE BULGARIA S.A.

Introduction

Since 2019, Etem Group and Gestamp Group have entered into an agreement concerning the creation of a joint venture focused on the extrusion and processing of aluminum profiles in the automotive industry.

Gestamp, with presence in more than 23 countries, is an international group dedicated to the design, development and manufacture of metal automotive components. The group specializes in developing innovatively designed products to achieve increasingly safer and lighter vehicles, thereby reducing energy consumption and environmental impact. Throughout its more than 20 years of experience, Gestamp has become a global technology provider characterized by its proximity to customers, ongoing innovation and strong internationalization. Here you can find more information about Gestamp.

Etem Group is a leader in aluminum extrusion, with more than 50 years of experience and continuous presence in the design and production of aluminium profiles. Etem has been the first ever integrated designer and producer of aluminium systems in Greece and among the most prominent ones in SE Europe. Through continuous innovation and investments in infrastructure, cutting-edge equipment and our people, ETEM became an international company with worldwide presence. Click here to know more about Etem Group.

For more information, please visit our website.

Policies and principles

Within GESTAMP ETEM AUTOMOTIVE BULGARIA S.A., commitment on ethical principles is extremely important. We support and respect the fundamental principles, as articulated in the Universal Declaration of Human Rights. We support the protection of international human rights across the business value chain and will not be complicit in any human rights' abuse. Our policies and procedures adhere to all applicable international, European and national laws and regulations concerning the freedom of association, assembly, and collective bargaining, as well as the prohibition of discrimination, forced and underage labour. Our principles on human rights are reflected in our <u>Business Code of Conduct</u> and our <u>Labour Human Rights Policy</u>, where we state our commitment to all rights contained in the ILO's declaration on Fundamental Principles and Rights at Work.

All GESTAMP ETEM AUTOMOTIVE BULGARIA S.A. employees are given the Business Code of Conduct during induction and must comply with company's principles.

Training

All employees receive regular training on our Business Code of Conduct and all aspects of our policies and specific training modules for material aspects of Human Rights.

Due diligence and Risk assessment

At least every five years, GESTAMP ETEM AUTOMOTIVE BULGARIA S.A. performs a Human Rights Risk Assessment and due diligence process to identify and monitor actual and potential risks within the context of our operations and beyond.

Grievance and remediation

Internal grievance mechanisms and public <u>integrity hotline</u>, are in place to ensure that employees and all stakeholders can report concerns or suspected violations.

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Supply Chain

These principles are not limited within our operational control; they are reflected in our <u>Sustainability Policy</u> and our <u>Supplier's Code of Conduct</u>, where suppliers and business partners are requested to comply with fundamental principles, including a dedicated section to Human Rights that includes, but is not limited to, the following clauses: Equal Opportunities, Child and Forced Labour, Harassment, Safe Working Conditions, Working hours, wages and benefits, freedom of association and more.

GESTAMP ETEM AUTOMOTIVE BULGARIA S.A. performs annual supply chain risk assessment, including actual and potential human rights risks based on industry and country of origin criteria and risks, while we operate on a written sustainable sourcing procedure, including assessment and risk identification tools. Sustainability due diligence on all suppliers regularly updates our procurement strategy.

The modern slavery statement has been approved by the top management of GESTAMP ETEM AUTOMOTIVE BULGARIA S.A.

Sofia, 01.10.2024

Emmanouil Fountoukis
Chief Executive Officer