
Regulation Compliance Policy

Duro Felguera Group



NOTICE: This document is a translation of a duly approved Spanish-language document and is provided for informational purposes only. In the event of any discrepancy between the text of this translation and the text of the original Spanish language document that this translation is intended to reflect, the text of the original Spanish-language document shall prevail.



Date	Revision	Issued by	Approved by	Description
19/12/2019	V1		Board of Directors Duro Felguera	Initial version
02/08/2022	V2	Internal Audit and Compliance Department	Board of Directors Duro Felguera	The regulation of adhesion of Spanish and Foreign subsidiaries is improved.



CONTENT

I.	INTRODUCTION	4
II.	PURPOSE OF THE POLICY	4
III.	SCOPE OF APPLICATION	5
IV.	GENERAL PRINCIPLES REGARDING CRIME PREVENTION.....	6
V.	BASE MODELS OF CRIME PREVENTION	7
VI.	CHANNELS FOR NOTIFYING ENQUIRIES AND INFRACTIONS	8
VII.	COMMITMENT OF THE BOARD OF DIRECTORS AND SENIOR MANAGEMENT AND DISSEMINATION.....	9
VIII.	INVESTED COMPANIES THAT FORM PART OF THE THE PERIMETER OF CONSOLIDATION OF DURO FELGEUERA GROUP	9
IX.	INVESTED COMPANIES THAT DO NOT FORM PART OF THE PERIMETER OF CONSOLIDATION OF DURO FELGUERA GROUP.....	10
X.	NON-FULFILLMENT OF THE POLICY	12
XI.	PUBLICATION AND ENTRY INTO FORCE.....	12
	ANNEX I. GLOSSARY OF TERMS	13
	ANNEX II. ANNUAL DECLARATION OF COMMITMENT.....	15
	ANNEX III. DECLARATION OF COMMITMENT OF SUBSIDIARIES UNCONSOLIDATED.....	16

I. INTRODUCTION

The introduction of the criminal liability of the legal person in the Spanish legal system, as well as the need to design and implement models of organisation and management of criminal risks (or crime prevention models) prompted the Board of Directors of Duro Felguera, S.A. (hereinafter "Duro Felguera") to design and implement in 2015 a Crime Prevention Model, in accordance with the requirements established in the Criminal Code, which would apply to Duro Felguera as parent company and its subsidiaries, and which would integrate and strengthen the culture of compliance that the organisation had been promoting and encouraging since long before the reforms of the Criminal Code.

The Duro Felguera Group has not only equipped itself with internal regulatory instruments that meet the need of adequate control and management systems in the field of criminal prevention and detection, but also, with the implementation of its Criminal Offence Prevention Model, it has strengthened its firm commitment to ensure compliance with ethical principles and good corporate governance, through a solid culture of regulatory compliance, in which the ethical values of the organisation are central to its activity and decision-making.

So, the Board of Directors of Duro Felguera, with the aim of guaranteeing that all companies that make up the Group carry out a professional activity that reflects a true culture of regulatory compliance that, in turn, complies with the established legal obligations, has promoted the approval of a policy that establishes the fundamental bases of the Duro Felguera Group's Crime Prevention Model, as well as the principals, rules and recommendations that apply to other Spanish or foreign companies that, despite not forming part of the Group's consolidation perimeter, are companies in which Duro Felguera has a stake.

Consequently, this Regulation Compliance Policy has been drawn up in line with the main regulatory references and best practices in the field of regulatory compliance, and in accordance with what is described in the rest of the internal regulations, especially the Code of Conduct and the Anti-Corruption Policy.

II. PURPOSE OF THE POLICY

The purpose of the Regulation Compliance Policy is to establish the fundamental bases and operation of the Duro Felguera Group's Crime Prevention Model, which states its commitment to establishing a culture of regulatory compliance that allows the development of diligent professional conduct, as well as to firmly condemn the commission of any kind of illegal act, without it being justified under any circumstances on the basis of a benefit for the organisation.

Likewise, this Policy also establish the principals, rules and recommendations on regulatory compliance applicable, as the case may be, to Spanish or foreign companies in which Duro Felguera has an interest that do not form part of its consolidation perimeter, which must adhere to this policy in the event that they have not designed and implemented a similar policy.

III. SCOPE OF APPLICATION

This Regulatory Compliance Policy applies to Duro Felguera and its subsidiaries (hereinafter, "Duro Felguera Group" or the "Group")¹. And therefore, this Policy is mandatory for:

-  All legal representatives of the companies that make up the Duro Felguera Group, including the legal directors, and those authorised to take decisions on behalf of these companies, including the de facto directors or other external supervisory bodies, and any natural or legal persons linked by legal relationships and/ or of any nature other than employment relationships, acting on their behalf (hereinafter referred to as "Representatives").
-  Any natural person who has an employment relationship with any of the companies in the Duro Felguera Group, including all officers and persons with organisational and controlling powers, as well as any person who provides employment services for any of the Group companies, irrespective of their employment status (hereinafter "Employees").
-  Any individual or legal entity that provides services to Duro Felguera Group, through a relationship other than an employment relationship and which is not included in the definition of Representatives, among them, vendors, contractors, suppliers, manufacturers, collaborators, consultants or commercial agents, business or commercial partners (hereinafter "Third Parties"), in all aspects applicable to them and taking into account the specific case.

The Regulatory Compliance Policy applies to all activities, both main and accessory, carried out directly or indirectly by the subjects previously qualified as mandatory. This Policy must be understood jointly with the matrix of criminal risks in which the typified conducts that could potentially be identified as crimes in the name or on behalf of the Group are collected. This matrix of criminal risks not only summarizes the different crimes, but also describes for each one of them, the main sensitive activities that entail criminal risks, all for the purpose of keeping the Group's employees and representatives alert to situations that could expose them to said risks in the exercise of their activities.

Likewise, paragraph IX of this Policy establishes the principals, rules and recommendations on regulatory compliance applicable to Spanish or foreign companies in which Duro Felguera has holdings and which do not form part of its consolidation perimeter.

¹ In this regards, it will be understood that the Duro Felguera Group is made up of all the companies that make up the scope of consolidation in accordance to its consolidated annual accounts.

IV. GENERAL PRINCIPLES REGARDING CRIME PREVENTION

The Duro Felguera Group must design, implement and maintain a Crime Prevention Model that complies with the following general principles:

-  Culture of legality. To require all Employees, Representatives and, where appropriate, Third Parties, to act at all times in accordance with the provisions of current legislation, especially criminal legislation, as well as with all the rules, principles and values that make up the Group's internal regulations.
-  Zero tolerance for the commission of offences within the organisation, without in any case being justified on the basis of benefit to the organisation.
-  Identification of Criminal Risks. Facilitate the necessary mechanisms to identify activities where criminal acts may be committed and encourage responsible action by all members of the organisation. All of this in accordance with the standards, principles and values established in the area of regulatory compliance.
-  Prevention and Control. Develop and implement the mechanisms of prevention and control that allows mitigate and minimize the exposure of Duro Felguera Group to the hypothetical criminal risks associated with the development of its activities.
-  Commitment. The management bodies of the companies that make up the Duro Felguera Group, the rest of its Representatives and Employees who have the status of senior managers shall be responsible for promoting and ensuring compliance with the rules and principals that govern the Group's Crime Prevention Model.
-  Transparency. Establish mechanisms and tools to facilitate the reporting to the supervisory and control body of the Crime Prevention Model of any suspicious fact or conduct that could imply the commission of a crime or non-compliance with this Policy, the Model and the regulations governing them. As well as establishing the obligation for Employees and Representatives to report these aspects, guaranteeing that the informant in good faith does not suffer reprisals.
-  Information. Guarantee that all Employees, Representatives and, where applicable, Third Parties, knows and have access to all the policies, procedures, manuals and regulations that make up the Crime Prevention Model. As well as to guarantee training and awareness of the obligations imposed by the Model.
-  Provision of financial and human resources. Provide an adequate framework for the definition, supervision, monitoring and achievement of the objectives of the Crime Prevention Model, through the provision of sufficient financial and human resources for the development of the compliance function.

-  Autonomy and independence. Guarantee the designation of an independent and autonomous supervisory and control body that is responsible for the supervision and effectiveness of the Crime Prevention Model, reporting directly to the Board of Directors of Duro Felguera –or to its delegated committees and/ or, depending on the case, to the administrative body of the respective company of the Group.

-  Continuous improvement and efficiency. Periodically review of the Crime Prevention Model through a process of continuous improvement by the supervisory and control body, which will report to the Board of Directors of Duro Felguera –or to its delegated committees–, on a recurring basis, and at least, annually, of its supervision and monitoring activities, as well as of the structural and regulatory changes that may have occurred, performance measurements of criminal regulatory compliance and the results that are made on its evaluation.

Responsibilities. All Employees, Representatives and, where applicable, Third Parties, must know and respond for all their actions or omissions that imply a breach of this Policy, the Crime Prevention Model and the regulations that develop them, in accordance with the applicable regulations.

V. BASIS OF THE CRIME PREVENTION MODEL

The Crime Prevention Model of Duro Felguera Group is a system of organisation and control aimed at both preventing, detecting and responding to crime through the design and implementation of a set of rules, policies and procedures that link all Employees, Representatives and, where applicable, Third Parties; and, whose supervision and verification will correspond to a body with autonomous powers of initiative and control.

Consequently, the rules, policies and procedures that make up the basis of the Crime Prevention Model of Duro Felguera, are:

-  **Regulatory Compliance Policy**, this Policy constitutes the basis of the Crime Prevention Model of Duro Felguera Group, establishing its general basic principles.

-  **Code of Conduct**, constitutes the basis of regulatory compliance of the Group, establishing the principles and guidelines of behaviour that inspire their actions.

-  **Crime Prevention Manual**, this is the document that describes, on the one hand, the configuration of the Crime Prevention Model and, on the other hand, each of the identified risks, along with their corresponding generic and specific controls, and recommendations to follow and prevent their materialization.

- df Anticorruption Policy**, which regulates the fundamental aspects of anti-corruption, establishing patterns of behaviour and prohibited conduct in the following areas: fight against corruption and bribery, situations of conflict of interest, accounting records, relationship with officials and public authorities, business partners and third parties that may act on behalf of the Duro Felguera Group.
- df Regulation of the Supervision and Control Body of the Crime Prevention Model**, which regulates the configuration of the supervisory and control body of the Crime Prevention Model of Duro Felguera Group and its functions, as well as the functions and responsibilities of other bodies of the Group in matters of criminal risk prevention.
- df Norm of communication of incidents and internal investigations**, describes the basic principles of use and operation of the Ethics Line, and establishes the procedure to follow in the communication and processing of incidents and queries.
- df Due Diligence with third parties**, determines the obligation to assess the risk that the Duro Felguera Group may commit regarding commercial relationship with (i) commercial mediator; (ii) potential partners in associative contracts; and (iii) the hiring of external advisors and consultants.
- df Third Parties Code of Conduct**, establishes the principles, behaviour guidelines and commitments that must be assumed by Third Parties that contract with the Group, within the framework of any commercial, business or collaboration relationship with the Group.

All policies, procedures, manuals, protocols and any other regulations that have been issued by the Duro Felguera Group in order to regulate the actions of its Employees and Representatives within the framework of the activities and functions carried out on behalf of or in favour of the Group will also integrate the Crime Prevention Manual of the Duro Felguera Group

VI. CHANNELS FOR NOTIFYING ENQUIRIES AND INFRACTIONS

All Employees, Representatives and, where applicable, Third Parties who have a relationship with the Group have the obligation to report all breaches related to this Policy, the Crime Prevention Model and the regulations that develop them, especially the Code of Conduct and the Anti-Corruption Policy, of which they are aware or suspect through the from provided on the Ethics Line (<https://lineaetica.durofelguera.com>).

Additionally, Duro Felguera Group makes available to its Employees, Representatives and Third Parties the email address dcn@durofelguera.com, through which they can make inquiries to the person in charge of the Internal Audit and Regulatory Compliance Department about the application and interpretation of this Policy, the Crime Prevention Model and the regulations that develop them, especially the Code of Conduct and the Anticorruption Policy.

VII. COMMITMENT OF THE BOARD OF DIRECTORS AND SENIOR MANAGEMENT AND DISSEMINATION MECHANISMS

This Policy reinforces the commitment of the Board of Directors and the Senior Management of the Duro Felguera Group in the defence of compliance with the law, as well as in the communication and dissemination of the principles contained in the Crime Prevention Model. Enforcing said commitment, and on an annual basis, both, the Representatives who have the status of members of the Board of Directors of Duro Felguera and of the administrative bodies of the rest of the companies that make up the Duro Felguera Group, as the Employees of the Group who have the status of Senior Management will sign the Annual Declaration of Commitment as per Annex II.

VIII. INVESTED COMPANIES THAT FORM PART OF THE PERIMETER OF CONSOLIDATION OF DURO FELGEUERA GROUP

The management bodies of the Spanish or foreign companies that form part of the consolidation perimeter of the Duro Felguera Group, in accordance with their consolidated annual accounts, must ratify their adherence to this Regulatory Compliance Policy and to the Crime Prevention Model of the Duro Felguera Group, as well as ratify their commitment to compliance and communication to the Employees of the same.

Foreign companies within the perimeter should analyse the criminal law of the country in which they are domiciled in order to determine which criminal and/ or administrative liability regime applies to legal persons. When the applicable foreign criminal legislation establishes the criminal and/ or administrative liability of legal persons, these foreign companies must analyse whether, in accordance with said foreign criminal legislation, the Crime Prevention Model of the Duro Felguera Group, to which they adhere, complies with the requirements and conditions for the exoneration or mitigation of the criminal and/ or administrative liability of the legal person and, if not, they must adopt the additional measures necessary for their compliance.

In any case, when the foreign criminal legislation applicable to these foreign companies establishes the criminal and/ or administrative liability of the legal person, these companies must carry out an analysis and identification of the hypothetical criminal risk that may be associated with the activities they carry out.

The obligations established in this section shall correspond to the management body of the Spanish or foreign companies in the scope of consolidation, which must take the necessary actions or measures for their effective compliance. These management bodies shall also be responsible for informing the Compliance Committee of compliance with these obligations, either directly or through the designation of a responsible body, as the case may be.

The Compliance Committees shall be responsible for supervising and controlling compliance with these obligations, and shall report to the Board of Directors of Duro Felguera, directly and/ or through the Audit, Risk and Compliance Committee.

IX. INVESTED COMPANIES THAT DO NOT FORM PART OF THE PERIMETER OF CONSOLIDATION OF DURO FELGUERA GROUP

Spanish or foreign companies owned by Duro Felguera which do not form part of the scope of consolidation, as well as unincorporated entities comprising Group companies, e.g. joint ventures and consortia, operating entities (hereinafter referred to as "Unconsolidated Entities") are obliged to conduct themselves with integrity, in accordance with the law and ethics, and in line with the principles, values, standards of behaviour, basic rules and international standards implemented by Duro Felguera Group through the present Policy, its Crime Prevention Model and the regulations that develop them, especially the basic regulations set up in section V of this Policy.

Thus, in terms of regulatory compliance and crime prevention, the following regulations and recommendations will be applied:

A. Declaration of knowledge of and compliance with the Duro Felguera Group's Regulatory Compliance Policy and Crime Prevention Model.

All Non-Consolidated Entities, through their legal representatives, must sign a declaration in which they undertake to comply with the Regulatory Compliance Policy, the Crime Prevention Model of Duro Felguera Group and the regulations that develop them, especially the Code of Conduct and the Anti-Corruption Policy (Annex III).

The Board of Directors of Duro Felguera shall be responsible through the head of the Group's Internal Audit and Regulatory Compliance Department, to send copies of all the documents identified in section V of this Policy to the management or governing bodies of these entities and to obtain a declaration of knowledge and compliance duly signed by a representative of the entity.

B. Design and implementation of an organisation and management model for criminal risk control, or controls in relation to the prevention of corruption, bribery, trading in influence, money laundering and tax fraud.

Depending on the criminal legislation applicable to the Non-Consolidated Entity, the following rules will apply:

-  The Non-Consolidated Entities with legal personality shall, **when the applicable criminal legislation establishes the criminal and/ or administrative liability of the legal person**, design and implement an organisation and management model for criminal risk control or crime prevention model that has adequate controls for the prevention and/ or mitigation of the hypothetical criminal risks associated with the activities they carry out, complying with the requirements established by the applicable

criminal legislation and the general principles of crime prevention established in section IV of this Policy.

df **The Non-Consolidated Entities with their own legal personality, when the applicable criminal legislation does not establish the criminal and/ or administrative liability of the legal person**, or when despite establishing criminal and/ or administrative liability of the legal person it is not applicable due to the lack of legal personality, e.g. joint ventures and consortia, shall at least design and implement adequate controls to prevent and/ or mitigate the risks of corruption, bribery, trading in influence, money laundering and tax fraud. These entities shall incorporate the principles, behavioural guidelines and standards of compliance established by the Duro Felguera Group.

The Board of Directors of Duro Felguera shall be responsible, supported by the Compliance Committees, encourage the administration or governance body of the Non-Consolidated Entity to design and implement the corresponding crime prevention controls in matters of corruption, money laundering and tax fraud, depending on the case.

The Compliance Committees shall be responsible for supervising and controlling compliance with these obligations, and shall report this to the Board of Directors of Duro Felguera, directly and/ or through the Audit, Risk and Compliance Committee

C. Notify irregularities or infractions detected

The Non-Consolidated Entities shall report directly to the Head of Internal Audit and Regulatory Compliance Department of the Duro Felguera Group (i) any violation or breach of the Regulatory Compliance Policy, the Crime Prevention Model of the Group and the regulations that develop them, especially the Code of Conduct and the Anticorruption Policy and (ii) any irregularity or crime committed by employees and representatives within said organization. In order to carry out this obligation, the Non-Consolidated Entities must inform their employees and representative of the possibility of reporting this type of infraction to their administrative or governing body, or directly to the person in charge of the Duro Felguera Group's Internal Audit and Regulatory Compliance Department, being able to use the Duro Felguera Ethics Line for this purpose.

Likewise, the Non-Consolidated Entities can make inquiries to the person in charge of the Internal Audit and Regulatory Compliance Department through the email account dcn@durofelguera.com regarding the application and interpretation of this Policy, the Crime Prevention Model and the regulations that develop them.

D. Control of Non-Consolidated Entities

The Head of Internal Audit and Regulatory Compliance Department upon request to the Legal Department, shall keep a register of the Non-Consolidated Entities, the regime and percentage of participation, the applicable regime of criminal and/ or administrative liability of the legal person and the measures or controls adopted



regarding the prevention of criminal risk. The analysis of the legislation applicable to those entities can be subcontracted to third parties.

X. NON-FULFILLMENT OF THE POLICY

The fulfilment of this Policy is responsibility of all Employees and Representatives of Duro Felguera Group. Nevertheless, the board of Directors of Duro Felguera, the Compliance Committee, the person in charge of the Internal Audit and Regulatory Compliance Department and the employees who have the status of Senior Management of the Group will be in charge of publicizing the content of the Policy, as well as supervising the fulfilment in each of their respective area of application.

Failure to comply with the provisions of this Policy may result in the application of the appropriate sanctioning measures, all in accordance with the provisions of the Collective Bargaining Agreements, the applicable labour regulations, or the commercial contracts governing the relationship between the parties.

XI. PUBLICATION AND ENTRY INTO FORCE

This Policy, as well as the Crime Prevention Model of Duro Felguera, will be subject to review and continuous improvement, especially when regulatory, social, business or any other circumstances so require.

This Policy was approved by the Board of Directors of Duro Felguera on December 19th, 2019, having been reviewed and updated on August 2nd, 2022. This Policy, which is mandatory, has been available to all employees of the Group and Representatives through the corporate intranet. Likewise, Third Parties related to the Group may access through the website of Duro Felguera.

ANNEX I. GLOSSARY OF TERMS

Audit, Risks and Compliance Committee: Internal body of the Board of Directors with powers, inter alia, to supervise the effectiveness of the internal control of Duro Felguera, the internal audit and the risks management system. In addition, it will be in charge of supervising and monitoring the good corporate governance, the transparency in social actions and compliance of the rules of Governance of Duro Felguera Group and of the Internal Conduct Regulations.

Compliance Committee: Collegiate control body responsible for the periodic supervision and monitoring of the Crimes Prevention Model of Duro Felguera Group, whose composition corresponds to the description set out in the Crimes Prevention Manual.

Duro Felguera: Duro Felguera, S.A.

Employees: Any individual person who maintains a labour link with any of the companies of the Duro Felguera Group, including all the executives and persons who hold organisation and control powers, as well as any person who provides labour services for any of the Group's companies, regardless of their contracting system.

Representatives: As the legal representatives of the companies that form Duro Felguera Group, including the jure directors, and those who are authorised to take decisions in the name of these companies, inter alia, the de facto directors or other external control bodies, and any individual persons or legal entities linked by legal relations and/ or of any nature other than labour, who act in its name.

Duro Felguera Group: Business group made up of Duro Felguera, as parent company, and its dependent or investee companies. It will be understood that Duro Felguera Group is composed of all the Spanish or foreign companies that form the Group's consolidation perimeter in accordance with its annual accounts.

Duro Felguera Group develops its activity in the following fields:

-  Construction, manufacturing and assembly activities in the metal, boilermaking, foundry and capital goods fields with turnkey projects.
-  The provision of marketing, distribution, construction and installation of services in energy activities, solid and liquid fuels, electronics and naval transport.
-  The promotion and creation of industrial, commercial and service companies, their expansion, development and modernization, national and international, and within the activities that constitute their corporate purpose.

Head of the Regulating Compliance and Internal Audit Management: This is the person in charge of executing the plan for the prevention of committing offences and, in general, for the Group's policy for preventing offences. His/ her duties consequently include the Group's management of the communication channels,

incidents and consultations (Ethics Line and e-mail dcn@durofelguera.com). This management forms part of the Compliance Committee.

Third Parties: All individual persons or legal entities that provide services or deliver goods or products to Duro Felguera Group, by means of a relationship other than labour and who are not included in the definition of Representatives. These include vendors, contractors, suppliers, manufacturers, collaborators, consultants or sales agents, business or commercial partners, inter alia.

Criminal Risk Matrix: document whose function is to analyse and assess the risk of committing crimes within the Duro Felguera Group. In this sense, the Duro Felguera Group has analysed, according to its activity, in its criminal risk matrix the risk of incidence of the following crimes defined in the Penal Code:

-  Crime of corruption in business
-  Crime of Fraud
-  Accounting Crime
-  Crime against Public Property
-  Crime of social security fraud
-  Crimes of punishable insolvency and frustration of the execution
-  Investor fraud crimes
-  Crime of abuse of privileged information and illicit communication of privileged information
-  Crime of altering the prices
-  Crime of corruption in international business transactions
-  Crime of bribery and influence peddling
-  Crime against industrial property
-  Crime of Discovery and disclosure of company secrets
-  Crime of money laundering and financing of terrorism
-  Crime of illegal financing of political parties
-  Crime of embezzlement of public funds
-  Crime against natural resources and the environment
-  Risk crimes caused by explosives and other agents
-  Crimes against public health
-  Smuggling crime
-  Crimes against the rights and safety of workers
-  Computer damage crime
-  Crime against intellectual property
-  Grant Fraud Crime
-  Crimes against the rights of foreign citizens
-  Hate speech crime
-  Crimes of Price alteration in competition and public auctions
-  Crime of refusal to inspection actions



ANNEX II. ANNUAL DECLARATION OF COMMITMENT

Grupo Duro Felguera is committed to comply with the highest ethical standards in matters of compliance, as well as to 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 of the Compliance Policy, the Crime Prevention Model and their implementing regulations, particularly the Code of Conduct and the Group's Anticorruption Policy.

At Duro Felguera Group 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 specially 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 use to comply with and enforce compliance, which govern the professional activity of Duro Felguera Group.

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

- I have received, read and understood the Compliance Policy, The Crime Prevention Model (and its Annex), the Code of Conduct and the Anticorruption Policy of Duro Felguera Group.
- Throughout the course of my responsibilities in Duro Felguera Group, I have faithfully complied with these regulations.
- I have communicated the Compliance Policy, The Crime Prevention Model (and its Annex), the Code of Conduct and the Anticorruption Policy of Duro Felguera Group 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 [*] _____

**ANNEX III. DECLARATION OF COMMITMENT OF SUBSIDIARIES
UNCONSOLIDATED**

Mr/ Ms. _____, of legal age, with National ID Document no. _____, who intervenes for and on behalf of the company _____, with Tax ID Code no. _____ and address at _____ (hereinafter, "_____"), in his/ her status as _____, hereby and for all the appropriate legal effects, states that:

- Duro Felguera Group has issued [...] a copy of (i) Regulatory Compliance Policy; (ii) Crime Prevention Model; (iii) Code of Conduct; (iv) Anticorruption Policy; (v) Regulations of the Oversight and Control Organ of the Crime Prevention Model; (vi) Incident reporting and internal investigations standard; (vii) Third Party Due Diligence Standard; and (viii) Third Party Code of Conduct. That [...] is aware of the content and scope of these regulations and agrees to comply with the principals and behavioural guidelines established in them.
- **Assumption 1. Unconsolidated entities with legal personality domiciled in jurisdictions that provide for criminal and/ or administrative liability of the legal persons:**
- **Option A.** [...] has designed and implemented its own penal risks prevention model and code of conduct applicable to its activity and it counts on suitable controls for the prevention and/ or mitigation of the risks of corruption, bribery, influence peddling, money laundering and tax fraud. The Model implemented by [...] incorporates and respects the behaviour guidelines and principals that are established in paragraph IV of the Regulatory Compliance Policy of Duro Felguera Group.
- **Option B.** [...] undertakes to design and implement its own criminal risk prevention model and code of conduct applicable to its activity, including appropriate controls for the prevention and/ or mitigation of, inter alia, the risk of corruption, bribery, influence peddling, money laundering and tax fraud. This model will comply with the general principles of crime prevention established in paragraph IV of the Regulatory Compliance Policy of Duro Felguera Group.
- **Assumption 2. Unconsolidated entities with legal personality, where the applicable criminal law does not provide for criminal and/ or administrative liability of the legal person, or where, despite providing for criminal liability of the legal person, it is not applicable because it lacks legal personality, e.g. joint ventures and consortia.**
- **Option A.** [...] has implemented adequate controls for the prevention and/ or mitigation of the risks of corruption, bribery, influence peddling, money laundering and tax fraud and, has integrated into its internal policies and regulations the general principles of crime prevention established in paragraph IV of the Regulatory Compliance Policy of Duro Felguera Group.



Option B. [...] undertakes to design and implement its own criminal risk prevention model and code of conduct applicable to its activity, including appropriate controls for the prevention and/ or mitigation of, inter alia, the risk of corruption, bribery, influence peddling, money laundering and tax fraud. This model will comply with the general principles of crime prevention established in paragraph IV of the Regulatory Compliance Policy of Duro Felguera Group.

- [...] undertakes to immediately notify to Duro Felguera any infraction or non-fulfilment of the Regulatory Compliance Policy, Crime Prevention Model, and the regulations that develop them, among them, the Code of Conduct and the Anticorruption Policy, including any information or trace of any indication of the commission of a crime within the organization. These communications will be made through the Ethics Line: <https://lineaetica.durofelguera.com/>. Additionally, [...] undertakes to collaborate with Duro Felguera in the investigation carried out therefore.
- [...] undertakes to inform its employees and representatives of the possibility of (i) notify this type of infraction to its administrative body, or directly through the Ethics Line: <https://lineaetica.durofelguera.com/>; and to (ii) consult on the interpretation and application of the Regulatory Compliance Policy and the Crime Prevention Model and the regulations that develop them, to the e-mail dcn@durofelguera.com.

In _____, on _____ of _____ of _____.

[Signature]