

CORPORATE POLICY ON THE EXCHANGE OF INFORMATION WITH COMPETITORS

GRI RENEWABLE INDUSTRIES S.L

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PURPOSE

The purpose of this policy is to establish mandatory rules and standards for all GRI Renewable Industries Group (hereinafter, "GRI", the "Group", or the "Entity") personnel which govern the exchange of information between such personnel and personnel from competing companies

SCOPE OF APPLICATION

This Policy applies to all companies that make up the GRI Group and all persons in the GRI Group in carrying out their duties and responsibilities, in all professional areas in which they represent the Group, and which maintain relationships with competitors, understood as such by the directors, managers, and employees of GRI companies, regardless of one's position, title, or geographical location.

CODE OF ETHICS AND CONDUCT

The GRI Code of Ethics and Conduct establishes an express statement on the values, principles, and guidelines of behavior that all the Group's employees must adopt in carrying out their professional work. Highlighted among its provisions is the obligation of those whose functions are related to commercial activities to always take established precautionary and information measures in their contacts with competitors, seeking advice on any doubts or incidents from the Compliance Committee through the Ethics Channel.

PRINCIPLES AND RULES OF ACTION

The exchange of information represents a particularly sensitive activity that may lead to a normative violation of antitrust laws and/or constitute a crime. Therefore, the GRI Group, with the intention of safeguarding its interests and those of its employees, thus establishes the following rules of action, which must be considered mandatory at all times, and may result in, upon the verification and detection of breach thereof, the corresponding penalties pursuant to applicable penalties.

As regards attendance or participation in events (such as trade shows, meetings, etc.) in which competitors are or may be interacted with, GRI Group employees cannot carry out, under any circumstances, actions that may give rise to or give the appearance of:

- Disclosing especially sensitive, individualized, and concrete GRI Group information, or requesting similar information related to other companies (commercial strategies, price lists, etc.).
- Coordination with competing companies through the establishment of anti-competitive agreements, such as pricing, establishment, and distribution of market shares, etc.

- Actions that harm consumers or other competitors by altering regular market conditions (the elimination of market and competition uncertainties, an increase in access barriers for non-members, and so forth).

Otherwise, the exchange of information, though care must be taken, shall be allowed in the following cases:

- Information not considered business secrets (for example, opinions on the impact a specific public policy may have on the market or the drafting of an economic outlook analysis).
- Technical information on the sector seeking a positive externality, understood as a possible improvement of existing techniques that may result in increases in quality, safety, etc.
- Exchange of public information.

ASSESING AND REPORTING POTENTIAL VIOLATIONS

Upon GRI Group personnel becoming aware of or suspecting that violations are occurring, or if a claim has been received from other external parties, for behaviors contrary to the performance standards established in this Policy, GRI employees are required to report such issues. To this end, the Group offers its employees the Ethics Channel to file complaints and queries regarding this Policy or any Corporate Policy issued by the GRI Group.

The GRI Group prohibits and will not tolerate any retaliation or threat of retaliation against any employee who reports a possible violation of the law, regulations, or Company policies, including the Exchange of Information Policy with competing companies.

DISCIPLINARY MEASURES

The Group may exercise the legal or disciplinary measures it deems appropriate, in accordance with current legislation in the corresponding jurisdiction, for failure to comply with this Policy or any of the policies and/or development codes of the Group's Compliance Model.

Inappropriate behavior, subject as such to any type of penalty, whether legal or disciplinary, shall include not only those persons in violation of this Policy's provisions and other supporting documents, but also those who, through action or failure to act, collaborate in said behavior.

LANGUAGE

This Standard is published in Spanish and English, the Spanish version prevailing in the event of a discrepancy between the two.

APPROVAL AND EFFECTIVE DATE

This policy was approved by the GRI Group's Board of Directors on 9 March 2023 and came into force on the same date. As from the effective date, previous provisions on the same content are repealed.

Acek Desarrollo y Gestión Industrial, S.L.
duly represented by Mr. Juan María Riberas Mera

Mr. Tomohisa Suzue

Holding Gonvarri, S.L. duly represented by Mr.
Juan María Riberas Mera

Mr. Takayuki Saito

Gestamp Bizkaia, S.A. duly represented
by Mr. Francisco José Riberas Mera

Mr. Mario Ruiz Escribano

