



Criminal Compliance Policy

Approved by the Board of Directors
CELSA STEEL S.A. as at 28 January 2025

Important information about this document

Identification of the Policy	<i>Criminal Compliance Policy</i>
Global or national implementation policy	Global
Rules it replaces	<i>Crime Prevention Compliance Policy</i>
Rules it repeals	None
Related standards	<i>Code of Ethical Conduct, Crime Prevention and Response Manual</i>
Business unit or function concerned	All business units and functions of the <i>CELSA</i> Group
Staff concerned	<i>All Members of the Organisation and Business Partners, as appropriate.</i>
Mainly responsible for its monitoring	<i>Ethics Committee</i>
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1 Definitions

For clarification purposes, the following definitions are provided to clarify the scope of this *Policy*:

- **CELSA / Organisation:** for the purposes of the *Criminal Prevention Model*, it shall refer to the company CELSA STEEL, S.A. and to the rest of the entities that make up the *Criminal Control Perimeter*, listed in **Annex I** of this *Policy*.
- **Criminal control perimeter:** includes the entities adhering to *CELSA's Criminal Prevention Model*, listed in **Annex I** of this *Policy*.
- **Board of Directors:** *CELSA's* governing body, to the extent that it has primary responsibility and authority for activities, governance and policies, and to which *CELSA's* Steering Committee reports and is accountable.
- **Management Committee:** a group of members within *CELSA*, with management and control functions within the *organisation* at the highest level.
- **Audit and Control Committee:** a permanent body made up of several members of the *Board of Directors*, of an informative and consultative nature, without executive functions, with full powers of information, advice and proposal within its scope of action, which is responsible, among other duties, for supervising the *Criminal Prevention Model*.
- **Members of the Organisation:** members of the *Board of Directors*, members of the Steering Committee, employees, workers or temporary employees or employees under a collaboration agreement and all other persons under the hierarchical subordination of any of the above.
- **Business partners:** any legal or natural person, other than *Members of the Organisation*, with whom the *Organisation* has or plans to establish some kind of business relationship. By way of example, but not limitation, this includes installation companies, agents or commission agents, suppliers, external advisors, *joint ventures*, customers and, in general, natural or legal persons contracted by *CELSA* to deliver goods or provide services.
- **Third party:** a natural or legal person or body independent of the *Organisation*.
- **Stakeholders:** the purposes of the *Crime Prevention Model*, this group includes natural or legal persons who, while not being *Business Partners* or *Members of the Organisation*, may be affected or perceived to be affected by a decision or activity of the *Organisation*. By way of example, this includes public administrations.
- **Criminal Prevention Model:** an organisational and management system for the prevention of crime, whose objective is the prevention, detection and management of *criminal risks*, and whose essential basis is represented in the *Criminal Compliance Policy* and in the *Crime Prevention and Response Manual*.
- **Ethics Committee:** *CELSA's* internal collegiate body with autonomous powers of initiative

and control, which is entrusted, among other tasks, with the responsibility of supervising the operation and observance of the *Criminal Prevention Model*. The existence of this body responds to the requirements established in Spanish criminal law (article 31 bis of the Spanish Criminal Code) regarding the supervision of the *Criminal Prevention Model*. Likewise, the *Ethics Committee* performs the role of *Head of the Internal Information System*.

- ***Criminal Compliance Policy***: is the set of provisions contained in this text, occasionally referred to as the "*Policy*".
- ***Catalogue of criminal risks and expected behavioural parameters***: document that reflects the list of offences applicable to legal persons under the terms of Spanish criminal law, as well as a brief description (not literal) of each one of them and develops the conduct expected of its addressees for their prevention, detection or early management.
- ***Crime Prevention and Response Manual***: this is the text that develops the organisational measures and procedures aimed at making the *Criminal Compliance Policy* effective.
- ***Criminal risk***: risk related to the development of conduct that could constitute a crime for which *CELSA* could be investigated, according to the criminal liability regime for legal persons established in the Spanish Criminal Code.
- ***Subjects affected by this document***: all *Members of the Organisation*, as well as *Business Partners* to be determined, when it is advisable or necessary to transfer all or part of the contents of this document

2 Object

This *Policy* develops the provisions of *CELSA's Code of Ethical Conduct and*, therefore, links with its ethical values, ratifying *CELSA's* firm will to maintain a conduct that respects both the rules and highest ethical standards and setting, for this purpose, its framework of principles of compliance in criminal matters.

This *Policy* is aligned with *CELSA's* culture of integrity and respect for the rules and takes into consideration not only the interests of the *Organisation* but also the demands that may come from its Stakeholders. In this sense, it is aligned with *CELSA's* strategic objectives and, consequently, with its determination not to tolerate any conduct that may constitute a crime. Therefore, the *Board of Directors*, the *Audit and Control Committee* and the *Steering Committee*, as well as the rest of the *Members of the Organisation*, must be fully committed to complying with its provisions.

Based on this commitment to compliance, it sets out the expected behavioural parameters of the *Subjects affected by this document*, requiring them to commit to them, describing the measures taken to monitor this mandate and the consequences in the event of non-compliance.

3 Scope of application

3.1 Companies and persons concerned

This *Criminal Compliance Policy* (hereinafter, the "*Policy*") is mandatory and applies globally to *CELSA*, as well as to its subsidiaries that have adhered to this *Policy* and that make up its *criminal control perimeter* for the purposes of this text.

Members of the Organisation shall comply with its contents, regardless of the position they hold and the territory in which they are located, unless the applicable law in the jurisdiction in which they operate provides for more stringent provisions, which shall prevail over this *Policy*.

As proof of delivery and acceptance of this document, the formal declaration of conformity in *Annex II* is provided to *Members of the Organisation*.

CELSA may also provide this *Policy* to those natural and legal persons who, in their commercial or industrial activity, are related to it, whose adherence to it will be performed through the channels provided for in *Annex III* of this *Policy*.

3.2 Activities concerned

CELSA's Catalogue of Criminal Risks and Expected Behavioural Parameters briefly describes the different criminal offences for which, in accordance with the provisions of article 31 bis of the Spanish Criminal Code, legal entities may be investigated in Spain. These criminal offences are for offences¹ committed in the name or on behalf of them, and for their direct or indirect benefit, (i) by **their legal representatives and de facto or de jure administrators**, or (ii) by **persons under their authority**, when the commission of the offence, in the latter case, is the result of a lack of due control, given the specific circumstances of the case.

The content of the *Catalogue of Criminal Risks and Expected Behavioural Parameters* not only summarises the different offences, but also describes for each of them, the main activities that could entail *Criminal Risks*, so that the addressees can be alert to situations that could expose them to such *Criminal Risks* in the exercise of their activities.

Likewise, reference is made to the behavioural parameters that *CELSA* expects from the *Subjects affected by this document*, which may include references to other internal rules or procedures in this regard.

¹ The Spanish Criminal Code provides for the criminal liability of legal persons for the commission of a closed list of offences (*numerus clausus*), which will be described in later sections of this *Policy*, without prejudice to the personal criminal liability that the *Members of the Organisation* or *Business Partners* who have committed the offence or who have cooperated or participated in the offences may have.

4 List of offences and behavioural parameters

The *Catalogue of Criminal Risks and Expected Behavioural Parameters* summarises the criminal offences for which **any legal person** may be criminally liable under the terms of the Spanish Criminal Code in force, although this document is neither detailed nor closed, as, in **addition to the modalities set out below, there may be other ways of incurring criminal offences.**

It is the **obligation of each person to be duly informed of the laws and their compliance.** It must be taken into consideration that the benefit obtained from an unlawful activity can be both **direct** and **indirect**, and caution must be exercised with regard to any conduct which, although unlawful, may end up benefiting *CELSA* in this broad sense. Likewise, legal persons are not only liable for actions or omissions that occur in Spain, but **also for what happens in any other country if certain circumstances are complied with**, which makes it necessary to be alert to potentially criminal conduct under Spanish law that occurs abroad.

In this regard, if you have any doubts regarding the content of this section or wish to obtain more information on the subject, you can contact the *CELSA Ethics* Committee or make a query through the [Ethics Line](#) and/or consult the criminal offences in the [current Spanish Criminal Code](#) (www.boe.es).

5 Organisational Measures

CELSA's *Criminal Compliance Policy* is based both on the principles and values set out in its *Code of Ethical Conduct* and on the requirements of article 31 bis of the Spanish Criminal Code, which are set out below:

5.1 Ethics Committee

5.1.1 Composition

CELSA has an *Ethics Committee*, which is responsible for criminal prevention and will be in charge of making this *Policy* effective through the implementation of the different measures set out in the *Criminal Prevention Model* that develops it.

The *Ethics Committee* is a collegiate body and is composed of the following members:

- *Compliance Manager*
- *Chief People Officer*
- *Chief Financial*
- *Head Sustainability & Public*
- *Chief Legal Officer*

The *Compliance Manager*, as a representative, reports directly on the activities of the *Ethics Committee* to the *Audit and Control Committee*, to which he reports functionally, as well as to the *Steering Committee*.

5.1.2 Autonomy and Independence

The *Board of Directors* has appointed the *Ethics Committee*, endowing it with autonomous powers of initiative and control, as well as the greatest possible independence to carry out its tasks, so that it is free from any business conditioning factors that could prejudice the performance of its duties.

In this regard, the *Ethics Committee* performs its tasks autonomously, without specifying specific mandates for this purpose, under the protection of the provisions of this *Policy* and the provisions of the *Crime Prevention and Response Manual*.

Under the terms set out in this *Policy*, the *Ethics Committee* enjoys the full support of the *Board of Directors* and the *Audit and Control Committee*, which entrust it with the responsibility of supervising the operation and observance of the *Crime Prevention Model*. In this respect, the members of the *Ethics Committee* are entitled to freely access both the documents of the *Organisation* and the *Members of the Organisation* that they require for the performance of their duties. All *Members of the Organisation* are obliged to immediately provide them with the documents and information requested in the performance of their duties.

The independence of the members of the *Ethics Committee* guarantees neutrality in decision-making. This independence is supported by their access to the *Audit and Control Committee* and the *Board of Directors* and, therefore, their distance from the management team and those in charge of operational management. In addition, the performance of the *Ethics Committee* is ultimately assessed by the *Audit and Control Committee*.

5.2 Obligations of Members of the Organisation

Insofar as compliance with the Law and the correct development of the *Criminal Prevention Model* is the responsibility of all *Members of the Organisation*, all of them are expected, regardless of the position they hold in the *Organisation*, to **(i)** ensure compliance with the provisions of this *Policy*, **(ii)** immediately respond to any indications they may receive from the members of the *Ethics Committee* in the exercise of the functions described above, **and (iii)** report through the Ethics Line any possible non-compliance observed within the *Organisation*.

5.2.1 CELSA's Board of Directors, Audit and Control Committee and Management Committee

The *Board of Directors*, the *Audit and Control Committee* and the *CELSA Management Committee* not only support the *Ethics Committee* in the exercise of its duties, but also actively promote the culture of *Compliance* in the *Organisation*, ensuring that it has adequate resources to effectively implement the *Criminal Prevention Model* and promoting the use of procedures and channels for reporting potentially criminal conduct that may affect the *Organisation* and its activities, among other issues.

The leadership exercised in *CELSA* by the *Board of Directors*, the *Audit and Control Committee* and the *Management Committee* means that, in addition to the duties that all the *Members of the Organisation* have, they are assigned the following important duties.

(i) Duties of the Board of Directors

The *Board of Directors* is *CELSA's* highest independent body responsible for the governance and representation of the *organisation*.

In relation to the *Crime Prevention Model*, the latter is responsible for approving and monitoring the development, management and administration of general policies and strategies, and is ultimately responsible for the *Crime Prevention Model*.

However, in matters of criminal *compliance*, *CELSA's* Board of *Directors* will act through the *Audit and Control Committee*.

The *Board of Directors* is responsible for formally approving this *Policy*, as well as any updates that may be required, and for promoting the adoption and implementation of a *Criminal Prevention Model* appropriate to *CELSA*, suitable for preventing, detecting and managing the *criminal risks* that threaten the *Organisation*.

In compliance with the provisions of the Spanish Criminal Code, *CELSA* assigned the supervision of the operation and compliance with the *Criminal Prevention Model* to a body

of the legal entity (*Ethics Committee*), with the *Board of Directors* being responsible for its appointment and for formally approving the creation of this body, granting it the necessary autonomous powers of initiative and control as well as adequate and sufficient financial, material and human resources so that it can effectively carry out its work.

As the body responsible for adopting the *Criminal Prevention Model*, the *Board of Directors* is responsible for periodically assessing its effectiveness, modifying it, if necessary, when it becomes aware, through any channel, of the existence of serious breaches or when there are significant changes in the circumstances affecting the *Organisation*, in the assessment of its *criminal risks* or in the *criminal compliance* objectives set by the Organisation.

Likewise, under the terms set forth in the *Criminal Prevention Model regarding criminal compliance* reports, the *Board of Directors* receives, reviews and subscribes to the reports provided by the *Ethics Committee*, through the *Audit and Control Committee*, adopting any actions suggested by it and promoting those it deems most appropriate for the appropriate management of the *criminal risks* identified.

(ii) Duties of the *Audit and Control Committee*

As a delegated body of the *Board of Directors* in relation to the *Criminal Prevention Model*, the *Audit and Control Committee* is responsible for:

- Adopt the necessary measures for the implementation and supervision of the development and application of the *Criminal Compliance Policy* and the *Code of Ethical Conduct*, as well as the rest of the policies that make up the *Criminal Prevention Model*, and their monitoring and updating.
- Supervision, monitoring and verification of the *Criminal Prevention Model*.

(iii) Duties of the *Steering Committee*

CELSA's *Steering Committee* collaborates with the *Board of Directors and the Audit and Control Committee* in the performance of its responsibilities, especially with regard to the transmission of the *Compliance* culture in the *Organisation* and its zero tolerance of conduct that could lead to the commission of illegal acts.

Due to its proximity to CELSA's strategic and operational objectives and its hierarchical position, the *Steering Committee* is responsible for directing and supporting all *Members of the Organisation* in the exercise of their *Compliance* obligations, ensuring that they are integrated into their daily activities within the *organisation*.

It must also ensure the availability of adequate and sufficient resources for the effective implementation of the *Crime Prevention Model*, communicating internally the importance of such implementation in a manner consistent with the provisions of this *Policy*.

The *Steering Committee* should also identify and act to manage potential or actual conflicts of interest where there are instances of delegated responsibility or decision-making authority in areas where *criminal risks* exist.

The Steering *Committee* participates in the processes of identification, analysis and evaluation of *criminal risks* when required to do so, and is also responsible for encouraging *Members of the Organisation* to use the channels available to them, *Business Partners* and *Third Parties* to report potentially unlawful conduct that may affect the *Organisation* and its activities.

With regard to communications from *Members of the Organisation* about activities related to *criminal risks*, the Steering *Committee* guarantees that there will be no retaliation, discrimination or sanctions for those communications performed in good faith or for those actions aimed at avoiding participation in unlawful actions.

5.2.2 All CELSA Members

All *Members of the Organisation* are responsible for understanding, observing and applying the provisions of this *Criminal Compliance Policy*, collaborating with the *Ethics Committee*, the *Board of Directors*, the *Audit and Control Committee* and the Steering *Committee* when necessary, and especially observing the behaviour expected of them with regard to the offences contained in *the Catalogue of Criminal Risks and expected behavioural parameters*.

Likewise, all *Members of the Organisation* shall immediately report to the members of the *Ethics Committee* any action to prevent or remedy the possible commission of an offence or potential offence of which they are aware

In addition, all *Members of the Organisation* must attend the training sessions on criminal compliance that are determined by reason of their function or position in the *Organisation*, and immediately provide the information and documentation requested by the members of the *Ethics Committee*.

6 Knowledge and declaration of conformity

This *Policy* is mandatory for new recruits and is available to all *Members of the organisation* on the [CELSA employee portal](#).

CELSA also makes this *Policy* available to its *Business Partners* through [CELSA's corporate website](#).

Members of the Organisation will be asked to sign their annual declaration of compliance with this *Criminal Compliance Policy* using the model attached as **Annex II**.

7 Reporting Conduct

All *Members of the Organisation* are obliged to report individual or collective behaviour or activities that occur in the context of their activities in the *Organisation* and that may contravene the content of this *Policy* or the other documents of the *Criminal Prevention Model*, regardless of whether such behaviour has been ordered or requested by a superior.

In order for this *Policy* to be effectively applied, *CELSA* has provided itself with various reporting and internal communication mechanisms so that *Members of the Organisation*, *Business Partners* and *Third Parties* can perform queries and/or reports related to practices that are contrary to applicable legislation or *CELSA*'s internal regulations.

In particular, the following channels have been made available:

a) Written communications:

- The *Ethics Line* will be available at the following link: <https://celsa.integrityline.com/>, accessible from the *Organisation's* employee portal and on *CELSA*'s corporate website.
- By Email: comite.etico@gcelsa.com
- By post to the following address for the attention of *the Ethics Committee*:

C/Ferralla, 12, Pol.Ind. San Vicente,
08755 Castellbisbal (Barcelona) Spain

b) Verbal communications

- By phone:
Spain +34 910477636.
France +33187212291.
Poland +48221523361.

The Whistleblower must enter the Access PIN code **9097**, corresponding to *CELSA*, after initiating the call, and may choose to communicate in the official language of the place from which the communication is performed, in English, or in Spanish.

- By means of a face-to-face meeting with the *Compliance Manager* or any other member of the *Ethics Committee*, within seven (7) days of the request. This communication will be previously informed and will be transcribed and the Whistleblower will be informed of the processing of his/her data in accordance with the legislation in force.
- Line manager or a member of *CELSA's management*, who should forward the information to the *Ethics Committee*.

Furthermore, the *Organisation* informs potential whistleblowers that they also have external reporting channels to the competent authorities and, where appropriate, to the institutions, bodies, offices or agencies of the European Union, such as, inter alia:

- At antitrust matters: [Complaint of prohibited conduct | CNMC](#)
- In the area of tax offences: [Tax Agency: Complaints](#)
- In case it is related to subsidies or fraud involving European funds: [Anti-fraud mailbox - Complaints channel of the Recovery and Resilience Mechanism - Recovery, Transformation and Resilience Plan Government of Spain \(planderecuperacion.gob.es\)](#).
- National Anti-Fraud Coordination Service: [IGAE:Servicio Nacional de Coordinación Antifraud \(hacienda.gob.es\)](#)
- Oficina Antifrau de Catalunya: [Complaints to the Anti-Fraud Office of Catalonia](#)
- As well as any other competent local authority where CELSA operates.

Potential whistleblowers are also made aware of the existence of a public body called the Independent Whistleblower Protection Authority (IPA), to which they can also turn.

Most convenient, however, is the use of the internal channels mentioned above as the preferred channel of communication.

8 Consequences of non-compliance

In accordance with the provisions of this *Policy*, as well as the *Crime Prevention and Response Manual*, all *Subjects affected by this document*, regardless of their organisational group and geographical and/or functional location, are obliged to comply with the principles and procedures set out in these texts, insofar as they are applicable to them. Likewise, for the purposes of ensuring the correct development of the *Crime Prevention Model*, they are urged to report any contravention thereof, in the terms set out in section 7 ("*Reporting Conduct*") of this *Policy*.

Consequently, when the *Ethics Committee* becomes aware of a breach of the provisions of this *Policy*, it will propose, as appropriate, to the *Board of Directors*, through the *Audit and Control Committee*, and to the *Steering Committee*, the disciplinary measures in the labour (for *Members of the Organisation*) or contractual (in commercial relations with *Business Partners*) sphere that it considers proportional to the risk or damage caused.

The *Steering Committee* is responsible for taking the relevant decisions with regard to facts related to serious or very serious administrative offences, occupational safety offences and any other contravention of *CELSA's* internal regulations or the applicable legal system that does not have criminal implications.

The *Board of Directors* is responsible for taking the relevant decisions regarding those events that may give rise to criminal liability for *CELSA*, once informed by the *Ethics Committee* through the *Audit and Control Committee*

Such measures will not only apply to those whose conduct has caused the risk or damage, but also to those *Members of the Organisation* who have not followed the procedures established by *CELSA* for prevention and response, which in itself is considered a breach of the values and ethical principles to which *CELSA* and all *Members of the Organisation* are committed.

The measures adopted from a labour perspective shall be respectful of the applicable regulations, without losing forcefulness or proportionality with the seriousness of the facts from which they arise, informing the *Workers' Legal Representatives* if appropriate.

In the event that there are unequivocal indications that the actions of any *Member of the Organisation* could constitute a criminal offence, this circumstance shall be reported to the competent *Public Authorities* for their knowledge and prosecution. Such notification shall be accompanied by the evidence and/or indications that may have been gathered in this respect.

Annexes

Annex I

Entities adhering to *CELSA's Criminal Compliance Policy*

Entities adhering to the *Criminal Compliance Policy* according to CELSA's corporate organisation chart²

Entity Company name	Date of accession	Corporate body which has formalised accession
CELSA STEEL, S.A.	[...]	[...]
CELSA LUXCO 1	[...]	[...]
CELSA LUXCO 2	[...]	[...]
CELSA OPCO, S.A.	[...]	[...]
CORCATINSER, S.L.U.	[...]	[...]
EUROPEAN SUPPLY CHAIN SERVICES, S.L.U.	[...]	[...]
NERVACERO, S.A.	[...]	[...]
CELSA ATLANTIC, S.L.	[...]	[...]
CELSA FRANCE, SAS	[...]	[...]
FERIMET, S.L.U.	[...]	[...]
APLICACIONES DE ACERO RIO TER, S.A.	[...]	[...]
INVERSIONES PICOS DE EUROPA, S.A.	[...]	[...]
COMPAÑÍA ESPAÑOLA DE LAMINACIÓN, S.L.	[...]	[...]
ALESPAL -AÇOS LAMINADOS ESPANHÓIS, LDA	[...]	[...]
GLOBAL STEEL WIRE, S.A.	[...]	[...]

² CELSA entities adhering to this *Criminal Compliance Policy* located outside Spanish territory must adapt the content of this policy to the legal requirements of the country in which they are located.

GLOBAL SPECIAL STEEL PRODUCTS, S.A.U.	[...]	[...]
ACEROS PARA LA CONTRUCCIÓN, S.A.U.	[...]	[...]
CELSA STEEL US	[...]	[...]
MOREDA RIVIERE TREFILERIAS SA	[...]	[...]
CELSA WIRE CERDANYOLA SA	[...]	[...]
PROTEK PLUS, S.A.U.	[...]	[...]
PIMAR 2002 TAS, S.L.	[...]	[...]
CELSA POLSKA HOLDING SPZOO	[...]	[...]
ROTORUA S.A.R.L. ("LuxCo 1")	[...]	[...]
SEMPRE DEVELOPMENT S.A.R.L.	[...]	[...]
CELSA HUTA OSTROWIEC HOLDING SP. Z.O.O.	[...]	[...]
CELSA HUTA OSTROWIEC SP. Z.O.O.	[...]	[...]
STAL-SERVICE SP. Z.O.O.	[...]	[...]
CATALUNYA STEEL, S.L.	[...]	[...]
WIRE ROD HOLDINGS, S.L.	[...]	[...]
CELSA LUXCO 3	[...]	[...]
CELSA LUXCO 4	[...]	[...]

Annex II

Formal declaration of conformity of the *Members of the Organisation*

Declaration of conformity

The undersigned hereby acknowledges that he/she has received the following documents, has read them and is satisfied with their contents:

- *CELSA's Code of Ethical Conduct*
- *Criminal Compliance Policy [\[link\]](#).*
- *Catalogue of criminal risks and expected behavioural parameters [\[link\]](#).*
- *[\[Other Organisational Policies\]](#) (specify)*

It therefore declares to be committed to their content and to develop the behaviours set out in them.

These documents regulate important matters for *CELSA* and, therefore, failure to comply with their provisions may have serious consequences in the labour field.

Name:

Signature:

Date of declaration:

Annex III

Formal declaration of conformity (in the form of a "letter" and "clause") from *Business Partners*

CELSA

[Address CELSA]

[Third-party company]

[Address of third party company]

Declaration of conformity

Dear Sirs;

We hereby inform you that we have had access to the following documents from your organisation:

- *CELSA's Code of Ethical Conduct [website where it can be found].*
- *Criminal Compliance Policy [web page where it can be found].*
- *[Other] [web pages where they can be found]*

In relation to them and having read their contents, we declare that we agree with their terms and principles, committing ourselves to conduct ourselves in line with them.

In addition, we agree to provide you with access to our facilities for verification purposes, and to submit to any verification procedures you may indicate to us.

We are aware that these documents regulate matters of great importance for CELSA, so that our substantial non-compliance with their content will cover the termination for just cause of the business relations that you maintain with us.

Name of the representative of [Third party company]: Signature:

Position:

Date of declaration:

Clause [No.]. Declaration of conformity

[Third party] declares that it has access to the following CELSA documents:

- *CELSA Code of Ethical Conduct [web page where it can be found].*
- *Criminal Compliance Policy [web page where it can be found].*
- *[Other] [web pages where they can be found]*

In relation to them, [Third Party Company] agrees to be bound by their terms and principles and undertakes to conduct itself in accordance with.

In addition, [Third Party Company] agrees to provide CELSA with access to its facilities for verification purposes, and to submit to the verification procedures that may be indicated for such purposes.

These documents regulate matters of great importance to CELSA, so that substantial non-compliance by [Third Party] with their contents will be grounds for termination of this contractual relationship for just cause.