



# sidenor

## EQUALITY PLAN

### 2024 - 2028





# SIDENOR GROUP EQUALITY PLAN

2024-2028

## 1. Introduction

The principle of equality is recognised in international spheres and also in our own state legislation. Specifically, Article 14 of the Spanish Constitution stipulates the right to equality and non-discrimination for reasons relating to gender. Moreover, Organic Law 3/2007 of 22 March on the effective equality of women and men (hereinafter "LOI") sets out to effectively implement the right to equal treatment and opportunities for women and men, most particularly by removing discrimination against women in any aspect of their lives.

Sidenor Aceros Especiales, S.L.U., Sidenor Investigación y Desarrollo, S.A and Sidenor Bright Steels, S.L.U (hereinafter "the Company" or "the Business" or "SIDENOR" fully concur with the importance of this principle of equality between women and men. This second Equality Plan will give continuity to the project that emerged in 2018 in which, considering the ongoing lack of parity and by way of a second step in the commitment undertaken in this area, the need to create an Equality Plan was perceived.

The Company drew up an Initial Situation Diagnostic, hereinafter "the Diagnostic", which enabled this new Equality Plan to be established in accordance with the current situation of the Company and with more specific measures geared towards achieving the objective, meeting the requisites introduced by legislation concerning equality through Royal Decree 901/2020 of 13 October on equality plans and their registration.

To this end, by way of a preliminary step, an Equality Committee was set up and helped to validate the Diagnostic and the Remuneration Register, and also to draw up and implement this new Equality Plan.

The Diagnostic conducted an analysis of the following areas:

- Selection and engagement process.
- Professional classification.
- Training.
- Professional promotion.
- Working conditions.
- Co-responsible exercise of rights concerning private life, working life and family life.
- Underrepresentation of women.
- Remuneration.
- Prevention of sexual harassment and gender-related harassment.
- Rights for female victims of gender violence.
- Prevention of Occupational Hazards from the gender perspective.
- Bodies representing employees.
- Communication, language, image and raising awareness.

On the basis of the conclusions reached in each of these areas studied, a starting point is established for the objectives and measures to be implemented for the Equality Plan.

## 2. General Regulations of the Equality Plan

### 2.1. Signatories

This Equality Plan is signed by the persons sitting on the Equality Committee, which was incorporated on 12 July 2023, and is composed of the following individuals:

Representing the company:

Roberto Alonso  
Amagoia Abalos  
Cruz M<sup>a</sup> Alberdi  
Ihintza Arregi  
Estibaliz Ochoa  
Garbiñe Iturbe  
Olatz Aranbarri  
Marta Yuste  
Verónica Pérez  
Cristina Ibergallartu  
Iñigo Murillo  
Fermín Arrizabalaga

Representing Trade Unions:

For CCOO: Antonio Martínez, Sergio Fernández and Sebastián Zuazo  
For ESK: Urbano Guerrero  
For LA SENDA DE UGARTE: José Ángel Becerra  
For LAB: Jorge Barroso and Ibon Zabaleta  
For UGT: Rosario M<sup>a</sup> Alonso, Sergio Colmenero and Jose Luis Balciscueta  
For USO: David Moreno and Víctor Sánchez

### 2.2. Territorial and personal scope of application

Pursuant to the provisions of Article 46.3 of the “LOI”, the Plan applies to the entire Company, and extends to all areas of national territory.

It therefore covers not only all its work facilities, but any others that may be added in the future, and its scope of application applies to all Spanish territory.

The provisions of the Equality Plan must generally be observed by the workforce of which the Company is composed, irrespective of their type of contract or of the posts they hold, and this includes employees assigned by temporary employment agencies.

### 2.3. Scope of application over time

The Equality Plan is variable and dynamic, and its measures will respond to principles of reasonableness and proportionality, in a bid to match the specific situation of the Company at any given time.

To this end, the term of validity of this Plan is four years from 22 July 2024, the date of its signature and entry into force, up to 21 July 2028.

At the date of termination of the period of validity, this Equality Plan's Negotiation Committee or, as the case may be, any new Negotiation Committee that may be created, will negotiate a new Plan, on the basis of an update of all and any data that may be necessary because they have been modified to assess the situation of equality between women and men at Sidenor at that time.

When the term of validity of this Plan expires on 21 July 2028, no extensions will be permitted.

### 3. Diagnostic report and remuneration audit

#### 3.1. Diagnostic report

The main conclusions drawn from the Diagnostic Report by Sidenor Aceros Especiales, S.L.U, Sidenor Investigación y Desarrollo S.A. and Sidenor Bright Steels, S.L.U. are set out in this Equality Plan in the section "Specific objectives of the Equality Plan, measures and time schedule".

The conclusions of the Equality Plan's Diagnostic are set out point by point, in addition to any issues to be corrected or fostered at companies. The aim is to achieve real material equality within the Sidenor Group, and to this end specific measures are introduced, establishing timelines, resources, parties responsible and realisation and measurement indicators for effective compliance. The indicators will be broken down by gender, whenever measurements refer to individuals.

The Diagnostic report was drawn up in due consideration of the issues regulated by Article 7 of Royal Decree 901/2020. The analysis was produced with the assistance of qualitative data, such as manuals, policies, in-house procedures, among others, and also with quantitative data broken down by gender such as total workforce, numbers of outgoing and incoming employees, number of interviews, types of contracts drawn up, number of instances of collaboration with training facilities, classification in professional categories, age, seniority, types of training and training schedules, internal promotion, types of working days and work/family balance measures.

All workforce data used in this Report are at 31 December 2022.

#### 3.2. Remuneration audit

For the purposes of the Remuneration Audit performed for Sidenor Aceros Especiales, S.L.U. (which includes Sidenor Bright Steels, S.L.U.) and also for Sidenor Investigación y Desarrollo S.A., pursuant to the provisions of Royal Decree 902/2020 of 13 October on equal remuneration for women and men, the following factors were employed to carry out the job assessment exercise:

- Training
- Languages

- Special training on specific issues/areas
- Experience
- Complexity
- Decision-making
- Responsibility for people
- Impact on results

The objective of carrying out the assessment of jobs using the factors stipulated is to guarantee objectivity and equality throughout the entire process.

To carry out the assessment of jobs properly, a percentage weighting and a points weighting were allocated to each factor, considering the characteristics of the Company.

Finally, in due consideration of the characteristics of each type of job, a score was allocated to each of the factors (where 1 is the lowest score, and 4 the highest), in order to obtain a total score for each post out of 1,000 points, and create different categories to combine posts with the same value.

In this way, the score obtained for each type of job ranges between 0 and 1,000 points, with a classification on 10 scales (each scale refers to an interval of 100 points), for the purposes of grouping types of job with the same value.

To analyse each scale, the various concepts were grouped in respect of both additions to basic pay and salary perks. In this way, interpretation of the data is more specific, and it is possible to draw real conclusions and decide whether or not they are justified in the event of any deviations.

The additions to basic pay were defined as follows:

- Seniority
- Personal allowance
- Special tasks
- Overtime
- Availability pay
- Annual extra payments
- Installation allowance
- Shift system
- Holidays
- Other extra payments
- Training
- Variable remuneration

The following were defined as salary perks:

- Travel
- Temporary incapacitation
- Expenses
- Miscellaneous

The following conclusions were drawn from the remuneration audit performed on Sidenor Aceros Especiales, S.L.U. (which includes Sidenor Bright Steels, S.L.U.):

The gap obtained with effective amounts stands at a mean of -12% and a median of -2%. This information analysed from compared amounts changes to a gap of 2% mean and 1% median.

Although in the company overall, the average comparative gap is low, the scale-based analysis shows a difference between jobs in relation to workshop tasks and office work. In the case of the former, workshop posts, the gap stands at 14% for the compared mean, and the main reasons for the difference are the additions to basic pay in relation to seniority and the shift system. This is due to the type of sector in which we operate - it is a masculinised sector, and female participation is still a minority, and moreover a recent phenomenon.

No unjustifiable discrepancies exceeding 25% between men and women were identified in any group (scale obtained from the job assessment exercise). As explained in the remuneration audit, all significant differences were scale-justified.

Justification was also furnished for any additions (to basic pay and salary perks) with a discrepancy of more than 25% against remuneration transparency.

Consequently, since there is no unequal pay to be corrected, it is not necessary to implement an action plan, and this is why no specific measures have been included to correct unequal pay, although control measures are included to prevent the emergence of any inequalities.

The following conclusions were drawn in the case of the remuneration audit performed at Sidenor Investigación y Desarrollo, S.A.:

The gap obtained from the effective amounts stands at a mean of 33% and a median of 32%. This information analysed from compared average amounts substantially changes the analysis. In this case there is an 18% gap for posts requiring intermediate qualifications/training, and the gap falls to 6% for the posts held by staff with higher qualifications/training, such as researchers. In both cases, female access to these posts emerged much later, and this is why their seniority is lower, thus explaining the gap.

Justification was also furnished for any additions (to basic pay and salary perks) with a discrepancy of more than 25% against remuneration transparency.

Consequently, since there is no unequal pay to be corrected, no action plan has been implemented, and this is why no specific measures have been included to correct unequal pay, although control measures are included to prevent the emergence of any inequalities.

### 3.3. Code for sexual harassment and gender-related harassment

With respect to information concerning the prevention of sexual harassment and gender-related harassment supplied in the Diagnostic Report, conclusions are as follows:

The Company has a Procedure for Sexual Harassment and Gender-related Harassment as part of the "Action in the event of Mobbing" Document, which lays down the guidelines for reporting sexual harassment, gender-related harassment and/or psychological harassment in the workplace. This protocol has been operational since 2016, it was updated in 2019, and made available to the entire workforce in 2020.

The Protocol regulates, in a broad sense, harassment, including psychological harassment, discriminatory harassment or violence in the workplace, and also any measures necessary to address sexual harassment and gender-related harassment in this Equality Plan.

With respect to sexual harassment and gender-related harassment issues, the Diagnostic reveals that the company has not received any reports, complaints or charges in this regard, and has not been obliged to discipline or dismiss any staff in the workforce for this reason.

The code was addressed by the committee, and meets the regulated contents of section 7 of the annex to Royal Decree 901/2020.

The Protocol for Sexual Harassment and Gender-Related Harassment (Action in the event of Mobbing) contains a declaration of principles and the definition of sexual harassment and gender-related harassment, and consequent identification of any instances of conduct that may constitute harassment. It states the procedure for action to be taken to address any complaints or reports that may emerge, and the precautionary and/or corrective measures applicable. It also stipulates reactive measures to harassment and, where applicable, the disciplinary system.

The range of specific measures in relation to the prevention of sexual harassment and gender-related harassment is set out in the section addressing "Specific objectives of the Plan and measures to be taken".

### 3.4. Conclusions of the initial Diagnostic

There follow the sections analysed in the diagnostics and their respective conclusions, which are common to each of the companies in the group: Sidenor Aceros Especiales, S.L.U.; Sidenor Bright Steels, S.L.U. and Sidenor investigación y Desarrollo, S.A., according to the data observed in the diagnostic:

#### 3.4.1. Selection and engagement process

In the course of the last year, the number of employees engaged, 9.7% female and 90.3% male, was very similar to the number of job applications submitted by each gender.

The number of women engaged permanently, accounting for 9.25% of the total number of these engagements, has increased and is extremely similar to the representation of this gender within the workforce, and they are increasingly a feature of contracts not covered by Collective Agreements, and as Specialist Technical Officers and Auxiliary Technical Officers.

Turning to individuals on training practicums, the number of females, specifically 14, or 47%, easily outstrips the average statistics of the market in which Sidenor operates.

#### 3.4.2. Professional classification



Composition of the workforce by genders shows an imbalance (9.5% are female, and 90.5% male). The group showing the largest representation of women is Contracts not covered by Collective Agreements, which accounts for 35%, but men dominate the other groups, and the group with the smallest female presence is Operators, administration and “DUAL” scheme, standing at only 4%.

The age curve is similar for both sexes, but an analysis of seniority in the case of women reveals that more women have been engaged in recent years.

#### 3.4.3. Training

Measures have been taken to ensure that all those working for the company have access to the same training facilities, irrespective of their sex, and the design of the training plan takes account of the posts held by each person. 66,858 hours of training were given, and 9.5% of trainees were female.

Most training is provided during working hours, and only 0.9% of training hours was outside these hours.

#### 3.4.4. Professional promotion

Although fewer women submitted applications, they secured more promotions than men, who submitted more applications than they did, but nevertheless obtained fewer promotions. 4 women featured in a range of promotions, and 8 men in the course of 2022. The outcome of this was promotion for 2 out of 4 women, and for 1 man out of 9.

Turning to Sidenor’s talent management model, the traits appraised are safety, technical aptitude, commitment and the capacity of individuals. These are all appraised irrespective of gender.

#### 3.4.5. Working conditions

In most cases, continuous shifts are the case for employees working split shifts which reduce their working hours. It is mostly women who undertake this shift-working setup.

#### 3.4.6. Co-responsible exercise of rights concerning private life, working life and family life

Sidenor does not operate any part-time contracts, and the workforce provides its services on a full-time basis. The exception is those with fewer working hours, which mostly applies to women, although men have increasingly been seeking this within the last two years. 4% of female employees avail themselves of this mechanism, as against 2% of male employees.

#### 3.4.7. Underrepresentation of women

The company does not have a balanced proportion of both genders in its workforce, but this underrepresentation of women is due to the social reality at the time of engagement. It is not due to any discrimination sought by the company. The workforce is composed of 1,630 men, accounting for 90.5% of the total workforce, and 171 women, accounting for 9.5% of the workforce. It should, however, be pointed out that in General Offices and R+D, the gender distribution is more equal, and women account for 39% and 38% of jobs respectively.

#### 3.4.8. Remuneration

From the remuneration register, the conclusion was reached that no unjustifiable discrepancies exceeding 25% between men and women were identified in any group, since there was justification for all significant differences, and these were unrelated to gender issues at Sidenor.

#### 3.4.9. Prevention of sexual harassment and gender-related harassment

There is a Protocol for Sexual Harassment and Gender-Related Harassment (in the “Action in the event of Mobbing” document) which explains how to act in these situations. The protocol stipulates that an external expert will be tasked with complaints, in a bid for greater objectivity concerning the issue to be addressed.

#### 3.4.10. Rights for female victims of gender violence

Female victims of gender violence are entitled to apply for a transfer to another work facility and a post with the same or equivalent professional category, and in these cases they will be entitled to apply for economic assistance by way of a contribution to the costs of relocation.

#### 3.4.11. Prevention of Occupational Hazards from the gender perspective

Sidenor operates a specific procedure known as workplace adaptation of especially sensitive female employees, including pregnant women.

#### 3.4.12. Communication, language, image and raising awareness

Written and spoken language are not sexist per se, although certain ways of using them are sexist. This is why Sidenor is committed to making its workforce aware of this reality which is intangible but is present in the daily working environment.

### 4. General objectives of the Equality Plan

The Sidenor Equality Plan sets out to implement a number of measures to secure effective equality at the Business, following the Situation Diagnostic's detection of areas for improvement in connection with equal opportunities for women and men. They will be implemented from the perspective of a number of general objectives:

- Make equality one of the Company's strategic objectives.
- Prevent and, as applicable, eliminate any manifestations, de facto situations, instances of conduct or actions in the corporate environment that undermine or may potentially undermine the full application of effective equality between women and men, and non-discrimination due to gender at the Business, either directly or indirectly.
- Make the gender perspective part of management at the Business.
- Correct any imbalances between men and women that may be present in various areas.

- Raise awareness and train the entire organisation in the principle of equal opportunities for men and women.
- Encourage the use of non-sexist inclusive language in all areas.
- Facilitate a balance for the personal life, family life and working life of the Sidenor Group workforce and encourage co-responsibility between men and women.
- Guarantee equality in future recruitment processes.
- Guarantee the specific employment conditions for female victims of gender violence.
- Guarantee inclusion of the gender perspective in the assessment and prevention of occupational hazards.

## 5. Justification of the advisability of a single equality plan for all businesses in the Group

This Equality Plan is the Sidenor Group's second Equality Plan.

Sidenor Aceros Especiales, S.L.U., Sidenor Bright Steels, S.L.U. and Sidenor Investigación y Desarrollo, S.A. form part of the same business group and have commercial links, and so the analysis of equality issues must be performed on a joint basis, notwithstanding consideration of the activities of each business and inclusion of the situation diagnostics in each of them.

These Group businesses share a number of corporate policies, in addition to certain characteristics of organisation, production, management of staff and other characteristics. Specifically, the governance system operated by the Business is the same, and employment guidelines and decisions are centralised for all the Company's business units.

This means that the situation diagnostic of these businesses is quite similar, and it is advisable for the corrective measures determined to be the same for all the Group companies. This joint analysis will propitiate properly aligned homogeneous decision-making and treatment, thereby complying with the requirements and policies to which the companies are subject.

## 6. Specific objectives of the Equality Plan, measures and time schedule

There follow a number of the aspects of improvement set out in the Equality Diagnostic in the areas analysed and, pursuant to the general objectives stipulated in the preceding section, along with a number of more specific objectives, and the measures to be implemented to properly correct the shortcomings observed.

Since employment policies are common across the group, the conclusions of the diagnostic report on the three Sidenor Group companies and, consequently, the measures to be taken concerning equality are applicable to Sidenor Aceros Especiales, S.L.U., to Sidenor Bright Steels, S.L.U., and to Sidenor Investigación y Desarrollo, S.A., as set out below:

## 6.1. Selection and engagement process

### a) Main aspects to be improved

The Equality Diagnostic detected aspects to be improved in relation to the selection and engagement process:

- Not all those involved in selection processes have received training in equal opportunities.
- Men were engaged more frequently than women at all times.
- With respect to onboardings by professional groups, most new female employees are taken on for administrative and technical posts not directly related to industrial plant production tasks.
- Most men, on the other hand, are taken on for groups related to factory production activities.

### b) First specific objective and measures for implementation

OBJECTIVE: Boost submission of applications by the underrepresented sex, in accordance with the vacancy to be filled.

N°	Measures						Indicator					Timeline			Party responsible		
6.1.1.1	Broaden recruitment sources and communication channels for possible job offers in order to bolster parity in the applications submitted (including territorial public employment services).						Number of recruitment sources (list of the sources)					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
6.1.1.2	Notify the entire workforce of vacancies and/or ensure that they have easy access to this information.						N° of communication channels used.					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
6.1.1.3	Draw up a register of candidates for selection processes that enables the percentages of women and men applying to be specified.						N° of interviews broken down by gender					For the entire duration of the plan			The Human Resources Department		

	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.1.1.4	Establish a regular review of the workforce balance by gender, in general, and by professional categories.						N° of women and men in the workforce				Annual, for the duration of the Plan			The Human Resources Department		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				X
6.1.1.5	Define indicators on engagement procedures, broken down by gender and organisational levels.						N° of persons engaged by gender, by organisational level and type of contract.				Annual, for the duration of the Plan			The Human Resources Department		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				X

c) Second specific objective and measures for implementation

OBJECTIVE: Guarantee a selection process that takes no account of the person's gender.

N°	Measures						Indicator					Timeline			Party responsible		
6.1.2.1	The candidate or staff recently engaged will be informed of the Company’s commitment to equality, during the selection process and during the initial onboarding, respectively.						Number of employees engaged who have been issued with the Equality Plan / Total number of employees engaged					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.1.2.2	Interviews do not contain any questions in relation to the personal circumstances of people (age, marital status, dependent children)						Interviews do not contain any questions that may refer to the personal circumstances of candidates people (age, marital status,					For the entire duration of the plan			The Human Resources Department and the head		

		dependent children)		
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	etc.).						etc.)								of the department where the engagement is made.		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.1.2.3	Provide training in equality for those involved in the selection process (Human Resources, and also heads of department involved in the process).						Number of people involved in selection processes with training in equality / total number of people involved in selection processes					21 months from registration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
							X										
6.1.2.4	Move towards a parity composition of selection teams.						Number of women making up the selection team / N° of people making up the selection team					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.1.2.5	Draw up a style book with a set of criteria to be followed to conduct interviews without any discriminatory questions.						Date of publication of the style book.					12 months from registration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
			X														
6.1.2.6	Make the company’s commitment to equal treatment and opportunities for women and men a visual part of job offers						N° of job offers with the commitment / N° of job offers					For the entire duration of the plan			The Human Resources Department		

	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X	X	X	X	X	X	X	X	X	X	X	X	X
6.1.2.7	Monitoring of fixed-term engagements.						N° of engagements by group or professional category and by gender					Annual, for the duration of the Plan		The Human Resources Department		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				X

## 6.2. Professional classification

### a) Main aspects to be improved

With respect to professional classification, the Sidenor group has a composition imbalance in relation to gender. The smallest representation of women is found in Operators, administration + “DUAL” scheme, standing at 4%.

### b) First specific objective and measures for implementation

OBJECTIVE: Boost the presence of women in the operators’ group.

N°	Measures						Indicator					Timeline			Party responsible		
6.2.1.1	Bolster contacts with teaching facilities, schools and universities to boost onboarding. Encourage agreements with training facilities to give women with technical qualifications access to the company, and work on introducing initiatives to raise awareness for local teaching facilities or institutions in order to give visibility to the company’s professional opportunities for women						Number of teaching facilities, schools and universities with which collaboration is ongoing					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X				X				X				X				



### 6.3. Training

#### a) Main aspects to be improved

The Company's Equality Diagnostic detected the following main aspects to be improved in relation to the training given to the workforce:

- Work is ongoing to enable people on leave as legal or family guardians to gain access to training, in order to facilitate their return to work or recycling after they have returned.
- The Company must continue to bolster access for women to specialist training to assist with their professional development.

#### b) First specific objective and measures for implementation

**OBJECTIVE:** Raise awareness and provide training in equal opportunities for the general workforce, and most especially for staff working on company schemes to ensure equality for men and women and objectivity in all processes.

Nº	Measures						Indicator					Timeline			Party responsible		
6.3.1.1	Provide training in equal opportunities for women and men, and also in the prevention of harassment, with priority given to: (I) those sitting on the Equality Monitoring Committee, (ii) those involved in the selection processes, and (iii) those involved in professional promotion and backed, should this be deemed advisable in each situation, by the resources of each territory.						1.Number of members of the Equality Monitoring Committee who have been trained in equal opportunities for women and men and in the prevention of harassment. 2.Number of those involved in selection and promotion processes who have been trained in equal opportunities for women and men					27 months from registration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
			X														
6.3.1.2	On a progressive basis, train the entire workforce in equal opportunities for women and men, and also in the prevention of harassment.						Number of employees who have received information on equality and the prevention of harassment / total number of employees					For the entire duration of the plan			The Human Resources Department		
Time schedule																	

	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.3.1.3	Furnish a copy of the Equality Plan to the entire workforce, and post a copy on the Intranet and other corporate media.						Number of employees who have received the Equality Plan / total number of employees				For the entire duration of the plan		The Human Resources and Purchases Departments			
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
			X													
6.3.1.4	Conduct a review of the Training Plan from the gender perspective in order to prevent any sexist connotations and stereotypes and prevent any discrimination in relation to gender.						Evidence that the Training Plan has been reviewed from the gender perspective to prevent any sexist connotations and stereotypes, and also prevent any discrimination in relation to gender.				Annual, for the duration of the Plan		The Human Resources Department			
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				X
6.3.1.5	The gender perspective will be included in training activities.						Training activities with the gender perspective are in place.				Annual, for the duration of the Plan		The Human Resources Department			
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
			X				X				X				X	
6.3.1.6	The workforce will be encouraged to attend training courses on equal opportunities.						Number of equality training attendees / Number convened				Annual, for the duration of the Plan		The Human Resources Department and the head of department			
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				X

6.3.1.7	Deliver the training report to the Monitoring Committee						Carried out YES/NO					Annual, for the duration of the Plan			The Human Resources Department	
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				X

c) Second specific objective and measures for implementation

OBJECTIVE: Help women and men gain access to specialist training that assists their professional development at the company, in a balanced fashion.

N°	Measures						Indicator					Timeline			Party responsible		
6.3.2.1	Priority will be given to online training, provided the training is officially approved.						Number of online training units / Total number of training units					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.3.2.2	Provide specific training to further professional promotion and functional mobility.						Specific training is provided to further professional promotion and functional mobility.					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.3.2.3	Detect training needs within the workforce in relation to improvement of their performance in employment, with a particular focus on women, to further their capacitation for posts mostly filled by men.						N° of women who have been on the “Avanza” Plan					Annual, for the duration of the Plan			The Human Resources Department and the head of department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	

			X				X				X				X	
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d) 6.3.4. Second specific objective and measures for implementation

OBJECTIVE: Encourage a female presence in training activities during periods over which they have been removed from professional activity for long periods of time.

N°	Measures						Indicator					Timeline			Party responsible		
6.3.3.1	Encourage the involvement of women and men in training activities during periods over which they have been removed from professional activities for long periods of time (leave for legal guardianship, child care, female victims of gender violence etc.).						Number of employees who have been removed from professional activities for long periods (child care leave, maternity leave etc.), and who have received training during this period / Total number of employees who have been removed from professional activities for long periods (child care leave, maternity leave etc.)					For the entire duration of the plan			The Human Resources Department and the head of department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	

6.4. Professional promotion

a) Main aspects to be improved

The following aspects to be improved were detected in the Equality Diagnostic of Sidenor Group companies:

- The “Avanza” Plan is a skills assessment tool for employees covered by a collective bargaining agreement, and through improvements to communication it sets out to ascertain people’s concerns, assess their contribution, and discover their expectations as part of a joint enterprise.
- The “Avanza” Plan has been operational at a number of Group plants since 2022 in a number of departments in Basauri, in Legutiano and some departments in Azkoitia, but implementation is still pending at plants such as Reinosa and the other departments in Basauri, Azkoitia and Vitoria so that it can reach all women and guarantee opportunities for professional promotion.
- Moreover, no specific training in equality is provided for those involved with professional promotions.

b) First specific objective and measures for implementation

OBJECTIVE: Improve and facilitate conditions for professional development and promotion.

Nº	Measures						Indicator					Timeline			Party responsible		
6.4.1.1	Announce vacancies (on the Intranet, notice board, in monthly e-mails to the workforce etc.), ensuring that the language and images are neutral, with no gender slants.						Notification of vacancies to Company employees					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
6.4.1.2	Improvements to communication channels to ensure that promotions reach the entire workforce.						Number of improvement initiatives taken with respect to communication channels.					18 months from registration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
						X											
6.4.1.3	Boost workforce participation in internal promotion processes with the collaboration of those responsible for the areas.						Number of internal promotion processes notified					Annual, for the duration of the Plan			The Human Resources Department and the head of department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
			X				X				X				X		
6.4.1.4	Make it easier for people to declare their desire for promotion/development.						Amount of feedback (party responsible-employee).					Annual, for the duration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
			X				X				X				X		
6.4.1.5	Ensure that people who have been in a situation						Number of employees that have					For the entire duration of the plan			The Human Resources Department		

	of leave due to legal guardianship or suspension of contract due to child care or natural breastfeeding can apply for professional promotion processes.						applied for promotion processes and have been in a situation of leave due to legal guardianship or suspension of a maternity leave or paternity leave contract or natural breastfeeding / total number of employees who have applied for promotion processes									
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.4.1.6	Attendance by employees of training courses on equal opportunities will be bolstered.						Number of equality training attendees / Number convened					Annual, for the duration of the Plan		The Human Resources Department and the head of department		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				X
6.4.1.7	Inform the Monitoring Committee of the internal promotion processes.						Sample of 10% of promotion processes to ensure they contain no gender slants					Annual, for the duration of the Plan		The Human Resources Department		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				X
6.4.1.8	Boost female applications for internal promotion processes with the collaboration of those responsible for the areas.						Nº of women applying for internal promotion processes notified					Annual, for the duration of the Plan		The Human Resources Department and the head of department		
7. Economic, human and material resources	For the Equality Plan to be applied and implemented properly, sufficient economic resources must be earmarked to ensure that the measures it contains are carried out. The Company is aware of this, and undertakes to provide the necessary means for effective application of the Quality Plan, furnishing the material, economic or personal resources or resources of any type, including the following:															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
											X				X	

- Dedication of members of the Equality Committee to the functions of assessing and monitoring the measures stipulated in this Plan and the level of achievement of the objectives set, and any other amendments to the Plan which become necessary or useful in the future.

6.4.1.9	Boost the development of technical competence and skills within the organisation through the “Avanza” Plan, highlighting the promotion of women to assist with their development inside the organisation.						N° of training programmes for women arising from the "Avanza" Plan				Annual, for the duration of the Plan			The Human Resources Department and the head of department		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				X

c) Second specific objective and measures for implementation

OBJECTIVE: Boost professional promotion as a means of increasing parity.

N°	Measures						Indicator					Timeline			Party responsible		
6.4.2.1	Work on raising awareness in the current workforce to encourage women to apply for internal vacancies or professional promotion processes.						Number of female candidates / total number of candidates					For the entire duration of the plan			The Human Resources Department and the head of department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.4.2.2	Provide specific training towards professional promotion and functional mobility.						Number of training schemes towards professional promotion and functional mobility					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.4.2.3	Information and monitoring of internal promotions, stating the number of people applying and the number of those selected.						N° of promotions					Annual, for the duration of the Plan			The Human Resources Department		
	Time schedule																

	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				X
6.4.2.4	Boost the involvement of women and men in training activities during periods over which they are removed from professional activities for long periods of time (leave to care for families and for child care).						Number of training activities taken up by employees during periods over which they are removed from professional activities for a long period of time (leave for child care, maternity leave etc.) / total number of training activities					For the entire duration of the plan		The Human Resources Department and the head of department		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

## 6.5. Working conditions

### a) Main aspects to be improved

The Equality Diagnostic of SIDENOR Group companies detected the following main aspects to be improved in relation to a balance between work and family life:

- An analysis must be performed of the workforce's perception with respect to working conditions for a work/life balance, its knowledge of these conditions, and the resources available to the workforce.

### b) First specific objective and measures to implement it

OBJECTIVE: Facilitate the exercise of rights to a work/family balance.

Nº	Measures	Indicator	Timeline	Party responsible
6.5.1.1	The workforce will be informed of their right to a work/family balance by means of posts on the Company notice board, the Intranet and any other usual means of communication.	Number of posts concerning a work/family balance on the notice board, the Intranet or any other usual means of communication to which employees have access	For the duration of the Plan	The Human Resources Department



Time schedule
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	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
			X													
6.5.1.2	The company will examine scenarios with exceptional personal circumstances declared by employees.						Number of applications with exceptional personal circumstances declared by employees / N° of applications accepted by the Company				For the entire duration of the plan		The Human Resources Department			
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.5.1.3	State that development of a professional career or the possibilities of promotion will not be denied to those exercising any rights to a work/family balance (leave, fewer working hours, adaptations to the working day etc.).						It has been declared that development of a professional career or the possibilities of promotion will not be denied to those exercising any rights to a work/family balance (leave, fewer working hours etc.).				Annual, for the duration of the Plan		The Human Resources Department			
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X				X				X				
6.5.1.4	Aid for direct care for the physically and/or mentally disabled: Sidenor employees personally caring for children under 18 years old with a disability/incapacity officially recognised by the competent public body of at least 33%, who have no entitlement to payments from Social Security or other public bodies, and do not carry on any paid professional activity, will receive an extraordinary annual allowance as follows: - Between 33% and 65%: 200 € a year. - Over 65%: 600 € a year. The Company reserves the right to increase these amounts to 3,000 € a year in cases of extraordinary necessity. Employees must apply						Number of allowances paid over for personal care of physically and/or mentally disabled persons / number of allowances for personal care of physically and/or mentally disabled persons				For the entire duration of the plan		The Human Resources Department			

	with accreditation of their entitlement to assistance, which may not be combined with other allowances.															
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.5.1.5	Allowance for care of minors with serious illnesses stipulated in Royal Decree 1148/2011 of 29 July. The beneficiaries of allowances will be employees caring for minors with cancer and other serious illnesses described in the list of afflictions established in this decree who are working full-time. Applications must be made with accreditation of the situation. When the situation has been accredited and analysed, the Business will introduce an extraordinary annual allowance over the period of time it establishes. The amount will not be a general sum, but will be established on an individual basis in accordance with the circumstances of each person, to a maximum of 12,000 €.						Number of allowances granted for care of minors with serious illnesses (Royal Decree 1148/2011) / number of allowances applied for in respect of care of minors with serious illnesses (Royal Decree 1148/2011)				For the entire duration of the plan		The Human Resources Department			
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.5.1.6	Guarantee sufficient proper spaces as female changing rooms in the workplace, depending on developments in numbers of women engaged.						Survey carried out YES/NO				15 months from registration of the Plan		The Human Resources Department			
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
					X											

c) Second specific objective and measures for implementation

OBJECTIVE: Ascertain the opinion of the workforce on implementation of the Equality Plan.

Nº	Measures						Indicator					Timeline			Party responsible		
6.5.2.1	Preparation of an equality survey halfway through the Plan. Its content and the method used to create and distribute it will be decided by the Assessment and Monitoring Committee						Number of individuals receiving the survey against the number of individuals in the survey.					Halfway through the period of validity after the Plan has been registered			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
											X						
6.5.2.2	Monitor work/family measures in relation to the organisation of work: adaptation of the working day, fewer working hours, leave for child care, breastfeeding etc., changes to holiday dates.						Report on applications, accepted and rejected					Annual, for the duration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
				X				X				X				X	

## 6.6. Co-responsible exercise of rights concerning private life, working life and family life.

### a) Main aspects to be improved

The Equality Diagnostic of the Sidenor Group companies detected the following main aspects to be improved in relation to a work/family balance:

- The analysis of distribution of the workforce against weekly working hours shows that part-time working days or days with or fewer hours, between 20 and 40 hours, are more commonly worked by women than men, which is because women combine their work with child care more frequently than men.

### b) First specific objective and measures for implementation

OBJECTIVE: Encourage a proper balance of compatibility between workplace responsibilities and personal/family life, and boost co-responsibility.

Nº	Measures						Indicator					Timeline			Party responsible		
6.6.1.1	Carry out information and awareness campaigns specifically targeting men, on co-responsibility and balanced task-sharing.						Number of information and awareness campaigns specifically targeting men, on co-responsibility and balanced task-sharing					Annual, for the duration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
						X				X				X			
6.6.1.2	In transfer requests, give special priority to any situations which, such as gatherings of families, assist with the work/life balance.						Number of transfers applied for due to family gatherings which assist with the work/life balance / N° of applications granted					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.6.1.3	Compatible working hours for couples working at the Company with children: Sidenor employees working shifts at the same facility and living with minors may submit applications to the Company to maintain their shift work in shifts that are compatible to prevent both of them providing services at the same time. In this way at least one of them can take care of the children directly. The application must be made jointly by the two employees in the Human Resources Department, with accreditation of the reason for the application, and this department will grant this circumstance on the basis of organisational or production-related criteria. If permission is granted, the Company may take proper organisational measures to guarantee a proper service in the departments or areas in which they						Number of working-hour compatibilities granted / total number of applications for working-hour compatibilities					For the entire duration of the plan			The Human Resources Department		

	work.																
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.6.1.4	Annual leave of 16 hours (in 4-hour blocks) which may be recouped up to the first quarter of the following year for accompanying children under 14 years old to the paediatrician or other medical specialists, with no age limit for children with an acknowledged and properly accredited disability. This kind of leave may also apply to any dependent ascendants or descendants in a legally recognised situation of dependency. Applications must be made by employees in the human resources department, accrediting the reason, and it is this department that grants this circumstance, for organisational or production-related reasons. Medical evidence must be furnished within the 48 hours following, with arrival and departure times. If the request is granted, the Company may take the proper organisational measures to guarantee a full service in the departments or areas in which the applicant works. Leave may be recouped up to the first quarter of the following year, at the behest of the Company, on notice of 5 days and in full working days, unless by the end of the year the balance outstanding does not make up a full working day, in which case the period of time will be regularised.						Number of medical accompaniment permits granted / Total number of medical accompaniment permits applied for					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	

## 6.7. Underrepresentation of women

a) Main aspects to be improved

The Equality Diagnostic for Sidenor Group companies detected the following aspects to be improved in relation to the underrepresentation of women at the Company:

- Although most of the workforce is composed of men, and this is not discrimination on the part of Sidenor, but rather the social reality of the time at which new employees are being sought, work must continue to boost the female presence and facilitate female access to the industry.

b) First specific objective and measures for implementation

OBJECTIVE: Boost the female presence in professional groups.

N°	Measures						Indicator					Timeline			Party responsible		
6.7.1.1	Seek new channels to attract women to the sector.						N° of new channels					Annual, for the duration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X				X				X				X				
6.7.1.2	Information and monitoring of posts where women are underrepresented						N° of persons in posts where women are underrepresented					Annual, for the duration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
				X				X				X				X	
6.7.1.3	In the case of new arrivals and/or internal promotions to improve the female/male balance in posts where females are underrepresented, women will be engaged for the post, in the same conditions and provided they meet the same profile required (qualifications, knowledge and skills) for the post offered.						N° of occasions on which women were chosen for posts with lesser representation					For the entire duration of the plan			The Human Resources Department and the head of department		
	Time schedule																
	2024	2024	2025	2025	2025	2025	2026	2026	2026	2026	2027	2027	2027	2027	2028	2028	

	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

## 6.8. Remuneration

### a) Main aspects to be improved

The Equality Diagnostic of Sidenor Group companies detected the following aspect for improvement in relation to remuneration at the Company:

- Although there is no unjustified gender remuneration gap, Sidenor wishes to ensure that this circumstance will not change for the duration of the Plan.

### b) First specific objective and measures for implementation

OBJECTIVE: Ensure that the same remuneration is paid for a post with the same value.

Nº	Measures						Indicator					Timeline			Party responsible		
6.8.1.1	Conduct a pay gap survey halfway through the Plan in order to analyse developments and potential corrective measures if need be.						Compare the Pay Audit in the initial diagnostic to this new survey					Halfway through the period of validity after the Plan has been registered			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
	X				X				X				X				

## 6.9. Prevention of sexual harassment and gender-related harassment

### a) Main aspects to be improved

This Equality Diagnostic for Sidenor Group companies detected the following aspects to be improved in relation to the prevention of sexual harassment and gender-related harassment at the Company:

- The need to make the entire workforce aware of the functioning of the harassment code in order to prevent harassment with greater effectiveness.

### b) First specific objective and measures for implementation



OBJECTIVE: Make the sexual harassment and gender-related harassment code known in order to prevent harassment.

Nº	Measures						Indicator					Timeline			Party responsible		
6.9.1.1	Make a copy of the sexual harassment and gender-related harassment Protocol (regulated in the “Action Protocol in the event of mobbing” document) available to the entire workforce and to all new arrivals at the Company.						1. Number of people who have received a copy of the harassment prevention code / N° of employees 2. Number of people who have received a copy of the harassment prevention code / N° of new arrivals at the company					For the entire duration of the plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
		X															
6.9.1.2	Post a copy of the harassment prevention code on the Intranet and on other corporate media						Provide evidence of a copy of the harassment prevention code posted on the Intranet and on other corporate media					9 months from registration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
		X															
6.9.1.3	Dispatch of a monitoring committee manifesto on Zero Tolerance of harassment to the entire workforce.						Manifesto and date of dispatch					12 months from registration of the Plan			Monitoring Committee		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
X																	

## 6.10. Rights for female victims of gender violence

### a) Main aspects to be improved

The Equality Diagnostic of the SIDENOR Group companies detected the following main aspects to be improved in relation to the rights of female victims of gender violence at the Company:

- Offer the victim, if she works at the same facility as the perpetrator, the chance to change to another facility, and reinforce the measures Sidenor has in place for these cases.
- Sidenor's total condemnation of acts of gender violence must also be made clear. Article 1 of Organic Law 1/2004 on Comprehensive Measures for Protection against Gender Violence defines this as “any act of violence (...) which, as a manifestation of discrimination, a situation of inequality and men's relations of power over women, is carried out against the latter by those who are or have been their spouses or by those who have or have had links to them through similar sentimental relations, even if they do not live together [...], the result of which is or may be physical, sexual or psychological harm or suffering, and threats of such acts, coercion or arbitrary deprivation of freedom, in their public life or in their private life”.
- The signatories to this plan are in agreement with total rejection of this kind of violence and, because this is also manifested in the workplace, they seek to secure a working environment with no discrimination.

b) First specific objective and measures for implementation

OBJECTIVE: Guarantee rights to which female employees falling victim to gender violence are entitled.

N°	Measures						Indicator					Timeline			Party responsible		
6.10.1.1	Include an information campaign on the rights of female employees falling victim to gender violence.						Number of people attending training courses on the rights of female employees falling victim to gender violence / Total number of employees					24 months from registration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
								X									
6.10.1.2	Disseminate the preferential right of the victims of gender violence to fill any vacancy at another work						Number of geographic mobility plans offered to victims of gender violence / number					16 months from registration of the Plan			The Human Resources Department		

	facility.						of geographic mobility plans applied for by victims of gender violence									
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X												
6.10.1.3	Victims of gender violence who, in a definitive judicial ruling, are obliged to leave their post at the location in which they had been providing their services and move to another Sidenor work facility, will be entitled to economic assistance as a contribution to the costs of relocating.						Requests for economic assistance for relocation by victims of gender violence / number of requests accepted for requests for economic assistance for relocation by victims of gender violence					For the entire duration of the plan		The Human Resources Department		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.10.1.4	Continue collaboration with associations, town halls etc. to help female victims of gender violence for the purposes of assisting their employability.						Number of businesses or organisations contacted / number of women who have taken part in company activities using this procedure.					Annual, for the duration of the Plan		The Human Resources Department		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
			X				X				X				X	
6.10.1.5	If the perpetrator also works at Sidenor, the victim will be given the option of deciding which of the two should be transferred to another work facility.						Nº of people who have decided on this option during the period of validity of the Plan.					For the entire duration of the plan		The Human Resources Department		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

6.10.1.6	Organise an event or campaign to promote the International Day for the Elimination of Violence against Women.						Carried out YES/NO					Annual, for the duration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
		X				X				X					X		

#### 6.11. Prevention of Occupational Hazards from the gender perspective.

##### a) Main aspects to be improved

The Equality Diagnostic of the SIDENOR Group companies detected the following main aspects to be improved in relation to the prevention of occupational hazards from the gender perspective at the Company:

- Make use of Group resources in such a way that all work tools, materials or facilities, are in keeping with the gender perspective.

##### b) First specific objective and measures for implementation

OBJECTIVE: Make the gender perspective part of prevention of occupational hazards.

N°	Measures						Indicator					Timeline			Party responsible		
6.11.1.1	Make the gender perspective part of the creation of the Prevention Plan, the Emergency Plan, supervision of health, and any other document-based obligation in relation to the prevention of occupational hazards.						The gender perspective is made part of the creation of the Prevention Plan, the Emergency Plan, supervision of health, and any other document-based obligation in relation to the prevention of occupational hazards.					48 months from registration of the Plan			Human Resources and Safety Departments		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
																	X
6.11.1.2	Draw up an assessment of psychosocial hazards expressly including the gender perspective and not limited exclusively to maternity and/or breastfeeding issues.						Date of the assessment and related queries.					48 months from registration of the Plan			Human Resources and Safety Departments		

	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
																X
6.11.1.3	Report on the existence or non-existence of proper breastfeeding facilities at the various work centres, in order to make plans for possible adaptations throughout the lifespan of the Plan.						Information on the review conducted. N° of courses of action planned				Halfway through the period of validity after the Plan has been registered			Human Resources and Safety Departments		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
												X				
6.11.1.4	Conduct a review of PPE and work clothes from the gender perspective in order to add any items that may be necessary.						Checklist of suitable PPE				12 months from registration of the Plan			The Human Resources, Safety and Purchases Departments		
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
				X												

## 6.12. Communication, language, image and raising awareness.

### a) Main aspects to be improved

The Equality Diagnostic of both Sidenor Group companies detected the following main aspects to be improved in relation to communication, language, image and raising awareness at the Company:

- The language used by the companies on most occasions is not neutral in either internal or external communications.
- With respect to communication, there are no regular internal informative meetings with the workforce. Meetings are only held with the Works Committee when this is deemed advisable.
- Internal communication facilities are not used in such a way as to foster equal opportunities and spread awareness of this among staff.
- With respect to external communication (other than the announcement of vacancies), no reference is made to equal opportunities for women and men.

b) First specific objective and measures for implementation

OBJECTIVE: Ensure that internal communication fosters an equal image of men and women.

Nº	Measures						Indicator					Timeline			Party responsible		
6.12.1.1	Revise and correct, if necessary, the language and images used in internal communications: Intranet, notice board etc., to make them inclusive.						If this was found to be necessary, the language and images used in internal communications were revised and corrected – Intranet, notice board etc. – to render them neutral.					12 months from registration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
				X				X				X				X	
6.12.1.2	Revise and correct, if necessary, the language of the website to make it inclusive.						If this was found to be necessary, a review was conducted of the use of inclusive language on the Company’s website and in the company’s internal communications					12 months from registration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
				X				X				X				X	
6.12.1.3	Distribution of the inclusive language guide to be applied in all external and internal communications.						Existence of an inclusive language guide					12 months from registration of the Plan			The Human Resources Department		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
				X													
6.12.1.4	Notice boards and the Intranet will be used as communication vehicles for the measures taken to date concerning equality and any others introduced subsequently, in addition to legal modifications in relation to this issue or through the Plan itself.						Number of publications on equality shared on notice boards and the Intranet					For the entire duration of the plan			The Human Resources Department		
	Time schedule																

	2024	2024	2025	2025	2025	2025	2026	2026	2026	2026	2027	2027	2027	2027	2028	2028
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	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
6.12.1.5	The gender perspective will be taken into account during meetings with the workforce.						Evidence that the gender perspective is taken into account during meetings with the workforce.				For the entire duration of the plan		The Human Resources Department			
	Time schedule															
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2
	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

c) Second specific objective and measures for implementation

OBJECTIVE: Ensure that external communication fosters an equal image of men and women.

Nº	Measures						Indicator					Timeline			Party responsible		
6.12.2.1	Our suppliers and customers will be notified of the Company’s commitment to equality on the corporate website.						Evidence that suppliers and customers have been notified of the Company’s commitment to equality on the corporate website (posts in the company’s internal communication channels)					18 months from registration of the Plan			The Human Resources and Purchases Departments		
	Time schedule																
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2	2027 Q3	2027 Q4	2028 Q1	2028 Q2	
					X												



	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2
				X				X				X
6.4.1.8	Boost female applications for internal promotion processes with the collaboration of those responsible for the areas.						Nº of women applying for internal promotion processes notified				Annual, f duration o	
7. Economic, human and material resources												
For the Equality Plan to be applied and implemented properly, sufficient economic resources must be earmarked to ensure that the measures it contains are carried out. The Company is aware of this, and undertakes to provide the necessary means for effective application of the Quality Plan, furnishing the material, economic or personal resources or resources of any type, including the following:												
	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	2026 Q3	2026 Q4	2027 Q1	2027 Q2
			X				X				X	

- Dedication of members of the Equality Committee to the functions of assessing and monitoring the measures stipulated in this Plan and the level of achievement of the objectives set, and any other amendments to the Plan which become necessary or useful in the future.
- A Room at the Company's facilities will be used for Committee meetings to this end.
- Allocation of economic resources to improve the current conditions of equality.

This list has not been finalised or appraised, and therefore, in due consideration of developments in the application of the measures stipulated in the Equality Plan, and any circumstances ensuing, the Company may bolster, adapt or extend the means provided here, in accordance with solvency, financial capacity and priority in achievement of the objectives.

## 8. Equality Plan assessment and monitoring system

The Committee will establish an effective system in this Equality Plan to assess and monitor the objectives it sets.

The Equality Plan Monitoring Committee will be tasked with adopting the measures set out in this Equality Plan and assessing the level of achievement of the objectives established for each area in which action is to be taken, as described in the preceding section.

The Monitoring Committee will be composed of 13 individuals, in representation of each trade union federation that approves this Equality Plan and by an identical number of representatives of the business.

Each federation will choose the people who are to represent them, in due consideration of their agendas, their own regulations and any criteria they may deem advisable to this end. The Sidenor Group will also choose its representatives.

At meeting it may also be advised by persons unrelated to the company, with special qualifications in the issues regulated by this chapter. They may speak, but have no voting rights.

Those making up the Equality Plan Monitoring Committee are as follows:

Representing the Company:

Roberto Alonso, Amagoia Abalos, Fermín Arrizabalaga, Cruz M<sup>a</sup> Alberdi, Ihintza Arregi, Estibaliz Ochoa, Verónica Pérez, Marta Yuste, Cristina Ibergallartu, Iñigo Murillo, Beatriz De La Torre, Garbiñe Iturbe and Edurne Andrés

#### Representing Trade Unions:

For CCOO: Sergio Fernández, Inmaculada Arroyo, Sebastián Zuazo and Sebastián Martínez

For ESK: Roberto Gómez

For LA SENDA DE UGARTE: José Ángel Becerra

For UGT: Rosario M<sup>a</sup> Alonso, Sergio Colmenero, Borja Lombraña and David Rodríguez

For USO: David Moreno, Miguel Angel Capetillo and Víctor Sánchez

All members of the Committee must exercise caution at all times with respect to any information, data, documents and/or any other information that may be used by the Committee.

For the purposes of assessing and monitoring the measures set out in the plan, the Equality Monitoring Committee will hold ordinary meetings once a year (at the beginning of the third quarter of each year following signature of the agreement), or extraordinary meetings when this is agreed by the parties, with a maximum timeline of 30 days, and the minutes will be drawn up for each meeting. In any case, an interim assessment will be conducted, and another final assessment will also be carried out, in July 2026 and July 2028.

The purpose of assessment and monitoring of the Plan by this Monitoring Committee will be to further the principle of equality and non-discrimination by assessing and monitoring the application of the measures tabled, in order to:

- Monitor the measures actually applied and those pending application, as per the schedule established.
- Identify possible obstacles to application, for the purposes of correcting or amending the strategy.
- Conduct a proper analysis of the changes arising.
- Detect fresh needs and proposals for improvement.
- Distribute the Plan and its progress to the entire workforce.
- Prepare an interim assessment and a final review assessment of the plan (Article 9.6 Royal Decree 901/2020)

## 9. Procedure for amendment of the Equality Plan

The provisions of Article 9 of Royal Decree 901/2020 are applicable for amendments to the Equality Plan. The current Plan will therefore be reviewed and amended, where applicable, in the following circumstances:

- When this must be done as the consequence of the outcome of regular monitoring, the interim assessment or the final assessment.

- When it is observed that it does not meet the legal or regulatory requisites, or is insufficient as a result of action taken by the Employment and Social Security Inspectorate.
- In the event of a merger, absorption, transfer or modification of the legal status of the Company.
- In the event of any incidents substantially modifying the Company workforce, its work methods, organisation or remuneration systems, including non-application of collective bargaining agreements and substantial modifications to working conditions or of any situations analysed in the situation diagnostic that formed the basis for drawing up the diagnostic.
- When a judicial ruling finds the Company guilty of direct or indirect discrimination for reasons related to gender, or when it determines that the Equality Plan does not meet the legal or regulatory requisites.

In the event of any of the aforementioned circumstances, the Equality Plan Negotiation Committee will be notified of the new situation emerging and, if this is a substantial change, it will be reviewed at the first meeting to monitor the Equality Plan.

When necessary, due to any of the aforementioned circumstances, the review will entail an update of the diagnostic, and of the measures stipulated in the Equality Plan, to the extent that may be necessary.

The foregoing is understood without prejudice to regular monitoring of the Plan, in such a way that the measures may be reviewed at any time for as long as it lasts, for the purposes of adding, refocusing, improving, correcting, intensifying, attenuating, or even ceasing to apply any of the measures it may contain in accordance with any effects that may emerge in relation to the achievement of its objectives.

## 10. Extrajudicial ruling on any disputes in relation to the Equality Plan

The Equality Committee will also be responsible for solving any discrepancies that may arise in the interpretation and application of the contents of this Equality Plan.

In the event of any discrepancies on the Equality Committee due to the interpretation, application, monitoring, assessment or review of the Equality Plan, the parties undertake to voluntarily and expressly submit to the procedures for reconciliation, mediation and arbitration for the purposes of resolving any conflicts arising from the interpretation, application, monitoring, assessment and amendment of this Equality Plan.

As per the 6<sup>th</sup> Agreement on the Autonomous Solution of Employment Conflicts, published in the "BOE" Official State Journal of 10 December 2020, the Interconfederal Mediation and Arbitration Service ("SIMA") is stipulated as the extrajudicial forum for any disputes in relation to the Equality Plan.

The Plan Negotiation Committee is solely and exclusively tasked with amending and altering the contents of the Equality Plan.

## 11. Publication and publicity for the Plan

The Equality Plan will be registered pursuant to the provisions of Article 11 of Royal Decree 901/2020, to make it publicly available.

Notwithstanding the foregoing, in order to ensure that it is made known to the workforce, a copy will be sent to:

- all employees, to whom it will be made available on the Intranet or the corresponding corporate channel, and when the new arrival joins the Company.
- the Negotiation Committee and the Equality Committee.

## 12. Comprehensive protection against gender violence

The Company and employee representatives are highly sensitive to the abominable social reality of gender violence.

In keeping with this feeling, and in a bid to mitigate as far as possible the potential consequences of this reality for female employees of Sidenor who fall victim to it, a number of initiatives have been determined that will be applied in cases in which individuals fall victim to gender violence. The Business seeks the collaboration of the entire workforce, at all levels, to effectively implement the rights laid down herein, and also for the purposes of bringing about a society with no discrimination, no violence and no harassment, by creating secure environments.

Approval of the Organic Law for Comprehensive Measures of Protection against Gender Violence ("L.O. 1/2004") constitutes a major acknowledgement of rights for female victims of gender violence, and bolsters the commitment to the elimination of violence undertaken by public institutions and social organisations.

Definition:

Organic Law 1/2004 Article 1 on Comprehensive Measures of Protection against Gender Violence:

“Any act of violence (...) which, as a manifestation of discrimination, a situation of inequality and men's relations of power over women, is carried out against the latter by those who are or have been their spouses or by those who have or have had links to them through similar sentimental relations, even if they do not live together [...], the result of which is or may be physical, sexual or psychological harm or suffering, and threats of such acts, coercion or arbitrary deprivation of freedom, in their public life or in their private life”.

The conditions for accrediting these measures will be those regulated in the corresponding regulations.

Accreditation of situations of gender violence, Article 23 of "L.O. 1/2004"

Situations of gender violence that lead to acknowledgement of the rights regulated by this law will be accredited by a conviction for any of the manifestations of violence against women stipulated in this law, a protection order or any other judicial ruling which stipulates precautionary measures in favour of the victim, or by a report by the Prosecution with indications that the plaintiff is a victim of gender violence. Situations of violence against women may also be accredited by means of reports by social services, by specialist services, or by the

assistance services provided by the competent Public Authority for the victims of gender violence, or in any other way, provided it is stipulated in the sectoral regulations governing access to each of the rights and resources.

Establishing the circumstance of women in the working environment, in keeping with the achievement of socially sustainable development and better working relations for women in employment, the victims of gender violence will be entitled, for the purposes of gaining effective protection and exercising their right to comprehensive social assistance, to:

1. Shorter working hours. Victims of gender violence will be entitled to make effective their protection or their right to full social assistance, to a shorter working day, with a proportional reduction of pay or the rearrangement of work time in accordance with what may be agreed with the Company. They will also be entitled to carry out their activities totally or partially in a remote format, or cease to do so if this is the system established, provided that in both cases this procedure for the provision of services is compatible with the post and functions carried out by the individual.
2. Geographic mobility or change of work facility. Any victims of gender violence will be entitled to request a transfer to another work facility and a post with the same professional category or the equivalent, and will be given preference for another job function.

The duration of the transfer will be up to 12 months, and this may be renewed for periods of 6 months, up to 2 years.

If, when this period has elapsed, or the circumstances which gave rise to this transfer request are no longer in place, the person will be entitled to choose whether to return to their job or to stay in the new job; in the latter case, the reservation of the previous post will expire.

The company will be obliged to notify female employees of any vacancies that are available at that time or that may arise in the future.

In the event of a definitive ruling, and a restraining order against the aggressor, if the victim and the aggressor are employed at the same work facility and the latter has not been dismissed by the company, the woman will decide which person is transferred. If this is not possible, action will be taken to ensure that the victim and the aggressor do not meet in the same environment, for the purposes of guaranteeing the safety of the female employee.

Any victim of gender violence who, pursuant to a definitive legal ruling, is forced to leave the job at the location where she was providing her services and move to another Sidenor facility will be entitled to economic assistance by way of a contribution to the costs of the move.

3. Suspension of the employment contract. Right to apply for suspension of relations of employment, with the job reserved, for a period of 3 months.

During the period of suspension, provided the waiting-period requisites have been met, female employees who are victims of gender violence will be entitled to draw unemployment benefit.

4. Termination of the employment contract. Dismissal of female employees who have fallen victim to gender violence through the exercise of their right to an effective judicial remedy or of the rights acknowledged in the Employment Statute will be declared null and void.  
Should these employees decide to terminate their employment contract of their own accord, and state this intention, the company will help them find a new job.
5. Absences or impunctuality. Any absences or impunctuality arising from the physical or psychological situation arising from gender violence will be considered justified, notwithstanding notification of such absences by the individuals as soon as possible.

In any case, irrespective of these measures, any individuals who can demonstrate that they are victims of gender violence will have the right to have their specific case examined and, by mutual agreement with the Business, for measures to be applied that are best suited to their specific circumstances, in accordance with the possibilities of the Business and their genuine feasibility.

These measures will be linked to the validity of Organic Law 1/2004 on comprehensive measures for protection against gender violence and regulations in this area, and to the validity and monitoring of the Equality Plan which includes them.

This Equality Plan was signed over on 22 July 2024 in Basauri, and ratified by the following:

#### Representing the company:

Roberto Alonso  
Amagoia Abalos  
Cruz M<sup>a</sup> Alberdi  
Ihintza Arregi  
Estibaliz Ochoa  
Garbiñe Iturbe  
Olatz Aranbarri  
Marta Yuste  
Verónica Pérez  
Cristina Ibergallartu  
Iñigo Murillo  
Fermín Arrizabalaga

#### Representing Trade Unions:

For CCOO: Sebastián Martínez, Sergio Fernández and Sebastián Zuazo

For ESK: Roberto Gómez

For LA SENDA DE UGARTE: José Ángel Becerra

For UGT: Rosario M<sup>a</sup> Alonso, Sergio Colmenero and Borja Lombraña

For USO: David Moreno and Víctor Sánchez

## Signatures:

For the company

Roberto Alonso
Amagoia Abalos
Cruz M <sup>a</sup> Alberdi
Ihintza Arregi
Estibaliz Ochoa
Garbiñe Iturbe
Olatz Aranbarri
Marta Yuste
Verónica Pérez
Cristina Ibergallartu
Iñigo Murillo
Fermín Arrizabalaga

For the trade unions:

CCOO Sebastián Martínez
CCOO Sergio Fernández
CCOO Sebastián Zuazo
ESK Roberto Gómez
LA SENDA DE UGARTE José Ángel Becerra
UGT Rosario M <sup>a</sup> Alonso
UGT Sergio Colmenero
UGT Borja Lombraña
USO David Moreno
USO Víctor Sánchez





**sidenor**  
EQUALITY PLAN

