CIE Automotive, S.A. and Subsidiaries

Limited Assurance Report Issued by an Assurance Provider on the Consolidated Non-Financial Information Statement (NFIS) and Sustainability Reporting

31 December 2025

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

KPMG Auditores, S.L.
Paseo de la Castellana, 259C
28046 Madrid

Limited Assurance Report Issued by an Assurance Provider on the Consolidated Non-Financial Information Statement and Sustainability Reporting of CIE AUTOMOTIVE, S.A. and subsidiaries for 2025

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the Shareholders of CIE Automotive, S.A.

Limited Assurance Conclusion

Pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the Consolidated Non-Financial Information Statement (hereinafter NFIS) of CIE Automotive, S.A. (hereinafter the Entity) and its subsidiaries (hereinafter the Group) for the year ended 31 December 2025, which forms part of the consolidated Directors' Report of the Group.

The content of the NFIS includes additional information to that required by prevailing mercantile legislation concerning non-financial information, specifically including the sustainability reporting prepared by the Group for the year ended 31 December 2025 (hereinafter the sustainability reporting) in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 as regards corporate sustainability reporting (CSRD). This sustainability reporting has also been subject to limited assurance review.

Based on the procedures conducted and the evidence we have obtained, no issues have come to our attention that would lead us to believe that:

a) The Group's Non-Financial Information Statement for the year ended 31 December 2025 has not been prepared, in all material respects, in accordance with the contents included in prevailing mercantile legislation and with the selected European Sustainability Reporting Standards (ESRS) or other criteria described in accordance with each subject matter in the *"6. Indicator tracking table based on the requirements of the Non-Financial Disclosures and Diversity Reporting Act and Directive (EU) 2022/2464 of the European Parliament and of the Council on Corporate Sustainability Reporting"* table of the aforementioned statement.

b) the sustainability reporting as a whole has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in the accompanying note "1.1.1.1 DR BP-1: General basis for preparation of the Sustainability Statement", including:

   - That the description provided of the process to identify the sustainability reporting included in note "*1.1.4.1 Information on the materiality assessment process"* is consistent with the process in place and that it identifies the material information to be disclosed in accordance with the requirements of the ESRS.
   - Compliance with the ESRS.
   - Compliance of the disclosure requirements, included in subsection "*2.1. Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)"* of the environmental section of the sustainability reporting with article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

Reg. Mer Madrid, T. 11.961, F. 90, Sec. 8, H. M -188.007, Inscrip. 9
N.I.F. B-78510153

Basis for Conclusion

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Revised Guidelines 47 and 56 issued by the Spanish Institute of Registered Auditors on assurance engagements on non-financial information and considering the content of the note published by the ICAC on 18 December 2024 (hereinafter generally accepted professional standards).

The procedures applied in a limited assurance engagement are less extensive compared to those required in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the level of assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those standards are described in more detail in the *Responsibilities of the assurance provider* section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) of the International Ethics Standards Board for Accountants (IESBA Code of Ethics), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1 (ISQM 1), which requires a quality management system to be designed, implemented and operated that includes policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Directors’ Responsibilities

The preparation of the NFIS included in the Consolidated Directors’ Report of the Group, and the content thereof, is the responsibility of the Directors of CIE Automotive, S.A. The NFIS has been prepared in accordance with prevailing mercantile legislation and the selected ESRS and other criteria described in accordance with each subject matter in the *“6. Indicator tracking table based on the requirements of the Non-Financial Disclosures and Diversity Reporting Act and Directive (EU) 2022/2464 of the European Parliament and of the Council on Corporate Sustainability Reporting”* table of the aforementioned statement.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the NFIS is free from material misstatement, whether due to fraud or error.

The Directors of CIE Automotive, S.A. are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the NFIS was obtained.

In relation to sustainability reporting, the entity's Directors are responsible for developing and implementing a process to identify the information to be included in sustainability reporting in accordance with the CSRD, the ESRS and article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 and for disclosing information about this process in the sustainability disclosures themselves in note *"1.1.4.1 Information on the materiality assessment process"* This responsibility includes:

- understanding the context in which the Group's business activities and relationships are conducted, and its stakeholders, in relation to the Group's impact on people and the environment.
- identifying actual and potential impacts (both negative and positive), and any risks and opportunities that might affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing and the cost of capital in the short, medium or long term.
- evaluating the materiality of the impacts, risks and opportunities identified.
- making assumptions and estimates that are reasonable in the circumstances.

The Directors are also responsible for the preparation of sustainability reporting, including the information identified by the process, in accordance with the sustainability reporting framework applied, including compliance with the CSRD, compliance with the ESRS and compliance with the disclosure requirements included in the subsection "*2.1. Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)"* of the environmental section of the sustainability reporting with article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- Designing, implementing and maintaining such internal control as the Directors determine is relevant to enable the preparation of sustainability reporting that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for sustainability reporting and making assumptions and estimates that are reasonable in the circumstances for specific disclosures.

Inherent Limitations in the Preparation of the Information

In accordance with the ESRS, the entity's Directors are required to prepare prospective information based on assumptions, which are to be included in the sustainability reporting, about events that may occur in the future, as well as possible future actions, if any, that the Group may take. The actual outcome may differ significantly from the estimate, as it refers to the future and future events often do not occur as expected.

In determining sustainability disclosures, an entity's management interprets legal and other terms that are not clearly defined and may be interpreted differently by other people, including the legal conformity of such interpretations, and are therefore subject to uncertainty.

Responsibilities of the Assurance Provider

Our objectives are to plan and perform the assurance engagement in order to obtain limited assurance about whether the NFIS and sustainability reporting is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report containing our conclusions thereon. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we apply our professional judgement and maintain an attitude of professional scepticism throughout the engagement. We also:

- Design and implement procedures to assess whether the process for identifying the information to be included in both the NFIS and sustainability reporting is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of material information to be disclosed in accordance with the requirements of the ESRS.
- Apply risk-based procedures, including obtaining an understanding of internal controls relevant to the engagement in order to identify the disclosures in which it is most likely that material misstatements arise, whether due to fraud or error, but not for the purpose of providing a conclusion about the effectiveness of the Group's internal control.
- Design and implement procedures that respond to disclosures in both the NFIS and sustainability reporting in which material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the Work Carried Out

A limited assurance engagement includes performing procedures to obtain evidence to support our conclusions. The nature, timing and extent of the procedures selected depend on professional judgement, including an identification of the disclosures in which material misstatements, whether due to fraud or error, are likely to arise in the NFIS and sustainability reporting.

Our work has consisted of making inquiries of management, as well as of the different units and components of the Group that have participated in the preparation of the NFIS, reviewing the processes for compiling and validating the information presented in the NFIS and sustainability reporting and applying certain analytical procedures and sample review tests, which are described below:

In relation to the NFIS assurance review process:

- Meetings with the Group’s personnel to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFIS for 2025 based on the materiality analysis performed by the Group and described in the “*1.1.4.1 Information on the materiality assessment process*” section, considering the content required by prevailing mercantile legislation.
- Analysis of the processes for compiling and validating the data presented in the NFIS for 2025.
- Review of the information related to the risks, policies and management approaches applied in relation to the material aspects presented in the NFIS for 2025.
- Corroboration, through sample testing, of the information relative to the content of the NFIS for 2025 and whether it has been adequately compiled based on data provided by the information sources.

In relation to the assurance on sustainability reporting process:

- Making inquiries of Group personnel:
  - to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
  - to understand the source of information used by management (e.g. stakeholder interaction, business plans and strategy documents); and the review of the Group's internal documentation on its process.
- Gaining, through inquiries with Group personnel, an understanding of the entity's processes for collecting, validating and presenting information relevant to the preparation of its sustainability reporting.
- Assessing the consistency of the evidence obtained from our procedures on the Group-implemented process to determine the information to be included in sustainability reporting with the description of the process included in such disclosures and assessing whether the Group-implemented process identifies the material information to be disclosed in accordance with the requirements of the ESRS.
- Assessing whether all the information identified in the Group-implemented process to determine the information to be included in sustainability reporting is effectively included.
- Assessing the consistency of the structure and presentation of sustainability reporting with the provisions of the ESRS and the rest of the sustainability reporting framework applied by the Group.
- Conducting inquiries of relevant personnel and analytical procedures on information disclosed in the sustainability reporting, considering information in which material misstatements are likely to arise, whether due to fraud or error.
- Performing, where appropriate, substantive sampling procedures on the information disclosed in the selected sustainability reporting, considering information in which material misstatements are likely to arise, whether due to fraud or error.
- Procuring, where applicable, the reports issued by accredited independent third parties accompanying the consolidated Directors' Report in compliance with EU regulations and, in relation to the information to which they refer and in accordance with generally accepted professional standards, confirming, exclusively, the accreditation of the assurance provider and that the scope of the report issued complies with EU regulations.
- Procuring, where appropriate, the documents containing the information included by reference, the reports issued by auditors or assurance providers of such documents and, in accordance with generally accepted professional standards, confirming, exclusively, that, as regards the document to which the information included by reference, the conditions described in the ESRS for including information by reference in the sustainability reporting are met.
- Procuring a representation letter from the Directors and management regarding the NFIS and sustainability reporting.

Other Information

The Directors of CIE Automotive, S.A. are responsible for the other information. The other information comprises the consolidated annual accounts and other information included in the consolidated Directors' Report but does not include either the auditor's report on the consolidated annual accounts or the assurance reports issued by accredited independent third parties required by EU law on specific disclosures contained in the sustainability reporting and accompanying the consolidated Directors' Report.

Our assurance report does not cover the other information, and we do not express any assurance conclusions about it.

In connection with our assurance engagement on the sustainability reporting, our responsibility consists of reading the other information identified above and, in doing so, consider whether there is a material inconsistency between the other information and the sustainability reporting or the knowledge we have obtained during the assurance engagement that could be indicative of material misstatements in the sustainability reporting.

KPMG Auditores, S.L.

(Signed on original in Spanish)

Silvana Alfaya Bas

25 February 2026

Non-Financial and Sustainability Reporting for the year ended 31 December 2025

TABLE OF CONTENTS

1. General disclosures

1.1. ESRS 2 General requirements
1.1.1 Basis for preparation
1.1.1.1 Disclosure Requirement (DR) BP-1: General basis for preparation of the Sustainability Statement
1.1.1.2 DR BP-2: Disclosures in relation to specific circumstances
1.1.2 Governance
1.1.2.1 DR GOV-1: The role of the administrative, management and supervisory bodies
1.1.2.2 DR GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
1.1.2.3 DR GOV-3: Integration of sustainability-related performance in incentive schemes
1.1.2.4 DR GOV-4: Statement on due diligence
1.1.2.5 DR GOV-5: Risk management and internal controls over sustainability reporting
1.1.3. Strategy
1.1.3.1 DR SBM–1: Strategy, business model and value chain
1.1.3.2 DR SBM-2: Interests and views of stakeholders
1.1.3.3 DR SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
1.1.4 Management of impacts, risks and opportunities
1.1.4.1 Information on the materiality assessment process
1.1.4.1.1 DR IRO-1: Description of the process to identify and assess material impacts, risks and opportunities
1.1.4.1.2 DR IRO-2: Disclosure Requirements in ESRS covered by the undertaking's Sustainability Statement
1.1.4.2 Minimum disclosure requirement (DR) of the policies and actions
1.1.4.2.1 DR - Policies MDR-P: Policies adopted to manage material sustainability matters
1.1.4.2.2 DR - Actions MDR-A: Actions and resources in relation to material sustainability matters
1.1.5 Metrics and targets
1.1.5.1 DR - Metrics MDR-M: Metrics in relation to material sustainability matters
1.1.5.2 DR - Targets MDR-T: Tracking effectiveness of policies and actions through targets

2. Environmental disclosures

2.1. Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)
2.1.1 Compliance with the Climate Taxonomy Regulation (Regulation (EU) 2020/852)
2.1.2 Table of Annex II Delegated Regulation (EU) 2021/2178
2.2 Climate change (ESRS E1)
2.2.1. Governance
2.2.1.1 DR related to ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes
2.2.2 Strategy
2.2.2.1 DR E1-1: Transition plan for climate change mitigation
2.2.2.2 DR related to ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
2.2.3. Management of impacts, risks and opportunities
2.2.3.1 DR related to ESRS 2 IRO-1: Description of the processes to identify and assess material climate-related impacts, risks and opportunities
2.2.3.2 DR E1-2: Policies related to climate change mitigation and adaptation
2.2.3.3 DR E1-3: Actions and resources in relation to climate change policies
2.2.4. Metrics and targets
2.2.4.1 DR E1-4: Targets related to climate change mitigation and adaptation
2.2.4.2 DR E1-5: Energy consumption and mix
2.2.4.3 DR E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions
2.2.4.4 DR E1-7: GHG removals and GHG mitigation projects financed through carbon credits
2.2.4.5 DR E1-8: Internal carbon pricing
2.2.4.6 DR E1-9: Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

2.3 Pollution (ESRS E2)
2.3.1 Management of impacts, risks and opportunities
2.3.1.1 DR related to ESRS 2 IRO-1 - Description of the process to identify and assess impacts, risks and opportunities related to pollution
2.3.1.2 DR E2-1 – Policies related to pollution
2.3.1.3 DR E2-2 - Actions and resources related to pollution
2.3.2 Metrics and targets
2.3.2.1 DR E2-3: Pollution-related targets
2.3.2.2 DR E2-4: Air pollution
2.3.2.3 DR E2-6: Anticipated financial effects from pollution-related impacts, risks and opportunities
2.4 Water and marine resources (ESRS E3)
2.4.1 Management of impacts, risks and opportunities
2.4.1.1 DR related to ESRS 2 IRO-1: Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities
2.4.1.2 DR E3-1: Policies related to water and marine resources
2.4.1.3 DR E3-2: Actions and resources related to water and marine resources
2.4.2 Metrics and targets
2.4.2.1 DR E3-3: Targets related to water and marine resources
2.4.2.2 DR E3-4: Water consumption
2.4.2.3 DR E3-5: Anticipated financial effects from water and marine resources-related impacts, risks and opportunities
2.5 Resource use and circular economy (ESRS E5)
2.5.1 Management of impacts, risks and opportunities
2.5.1.1 DR related to ESRS 2 IRO-1: Description of the processes to identify and assess effects from resource use and circular economy-related risks and opportunities
2.5.1.2 DR E5-1: Policies related to resource use and circular economy
2.5.1.3 DR E5-2: Actions and resources related to resource use and circular economy
2.5.2 Metrics and targets
2.5.2.1 DR E5-3: Targets related to resource use and the circular economy
2.5.2.2. DR E5-4: Resource inflows
2.5.2.3 DR E5-5: Resource outflows
2.5.2.4 DR E5-6: Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities

3. Social Information

3.1. Own workforce (ESRS S1)
3.1.1. Strategy
3.1.1.1 DR related to ESRS 2 SBM-2 – Interests and views of stakeholders
3.1.1.2 DR Related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model
3.1.2. Management of impacts, risks and opportunities
3.1.2.1 DR S1-1 – Policies related to own workforce
3.1.2.2 DR S1-2 - Processes for engaging with own workforce and workers' representatives about impacts
3.1.2.3 RD S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns
3.1.2.4 RD S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions
3.1.3. Metrics and targets
3.1.3.1 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
3.1.3.2 RD S1-6 – Characteristics of the undertaking's employees
3.1.3.3 DR S1-7 - Characteristics of non-employees in the undertaking's own workforce
3.1.3.4 DR S1-8 – Collective bargaining coverage and social dialogue
3.1.3.5 DR S1-9 - Diversity metrics
3.1.3.6 DR S1-10 - Adequate wages
3.1.3.7 DR S1-11 - Social protection
3.1.3.8 DR S1-12 - Persons with disabilities
3.1.3.9 DR S1-13 - Training and Skills Development Metrics

3.1.3.10 DR S1-14 - Health and Safety Metrics
3.1.3.11 DR S1-15 - Work-Life Balance Metrics
3.1.3.12 DR S1-16 - Remuneration metrics (pay gap and total remuneration)
3.1.3.13 RD S1-17 – Incidents, complaints and severe human rights impacts
3.2. Workers in the value chain (ESRS S2)
3.2.1. Strategy
3.2.1.1 DR related to ESRS 2 SBM-2 – Interests and views of stakeholders
3.2.1.2 DR related to ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
3.2.2. Management of impacts, risks and opportunities
3.2.2.1 ESRS S2-1 – Policies related to value chain workers
3.2.2.2 DR S2-2 – Processes for engaging with value chain workers about impacts
3.2.2.3 DR S2-3 – Processes to remediate negative impacts and channels for value chain workforce to raise concerns
3.2.2.4 DR S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions
3.2.3. Metrics and targets
3.2.3.1 DR S2-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
3.3. Customers (Entity-specific disclosures) (ES)
3.3.1 DR SBM-2: Interests and views of stakeholders
3.3.2 DR SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
3.3.3 DR IRO-1: Description of the process to identify and assess material impacts, risks and opportunities
3.3.4 R - Policies MDR-P: Policies adopted to manage material sustainability matters
3.3.5 DR - Actions MDR-A: Actions and resources in relation to material sustainability matters
3.3.6 Targets MDR-T: Tracking effectiveness of policies and actions through targets
3.3.7 Metrics MDR-M: Metrics in relation to material sustainability matters

4. Governance Disclosures

4.1. Business conduct (ESRS G1)
4.1.1. Governance
4.1.1.1 ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies
4.1.2. Management of impacts, risks and opportunities
4.1.2.1 DR related to ESRS 2 IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities
4.1.2.2 DR G1-1 - Corporate culture and business conduct policies and corporate culture
4.1.2.3 DR G1-2 – Management of relationships with suppliers
4.1.2.4 RD G1-3 – Prevention and detection of corruption and bribery
4.1.3. Metrics and targets
4.1.3.1 DR G1-4 – Incidents of corruption and bribery
4.1.3.2 DR G1-5 – Political influence and lobbying activities
4.1.3.3 DR G1-6 – Payment practices

5. Indicators under the Non-Financial Disclosures and Diversity Reporting Act not covered by the European Sustainability Reporting Standards

6. Indicator tracking table based on the requirements of the Non-Financial Disclosures and Diversity Reporting Act and Directive (EU) 2022/2464 of the European Parliament and of the Council on Corporate Sustainability Reporting

1. General disclosures

1.1 ESRS 2 General requirements

1.1.1 Basis for preparation

1.1.1.1 Disclosure Requirement (DR) BP-1: General basis for preparation of the Sustainability Statement

ESRS 2- BP-1- 5 a)	*The undertaking shall disclose:* ***(a) whether the sustainability statement has been prepared on a consolidated or individual basis;***

This report is the 2025 Consolidated Non-Financial and Sustainability Reporting of CIE Automotive, is submitted as an annex of its Consolidated Directors' Report, and it provides information on the sustainability activity of CIE Automotive S.A., and its investees during the year in the countries in which it operates. The Chinese joint venture SAMAP is excluded from this scope, as it is consolidated by the equity method.

ESRS 2- BP- 1-5 b) i	*The undertaking shall disclose:* ***b) for consolidated sustainability statements:*** ***i. a confirmation that the scope of consolidation is the same as for the financial statements, or, where applicable, a declaration that the reporting undertaking is not required to draw-up financial statements or that the reporting undertaking is preparing consolidated sustainability reporting pursuant to Article 48i of Directive 2013/34/EU****; and*

The scope of the information included in the Consolidated Non-Financial and Sustainability Reporting refers to the financial scope considered in CIE Automotive's Consolidated 2025 Financial Statements.

ESRS 2- BP- 1-5 b) ii	*The undertaking shall disclose the following information:* ***b) for consolidated sustainability statements:*** ***ii. where applicable, an indication of which subsidiary undertakings included in the consolidation are exempted from individual or consolidated sustainability reporting pursuant to Articles 19a(9) or 29a(8) of Directive 2013/34/EU.***

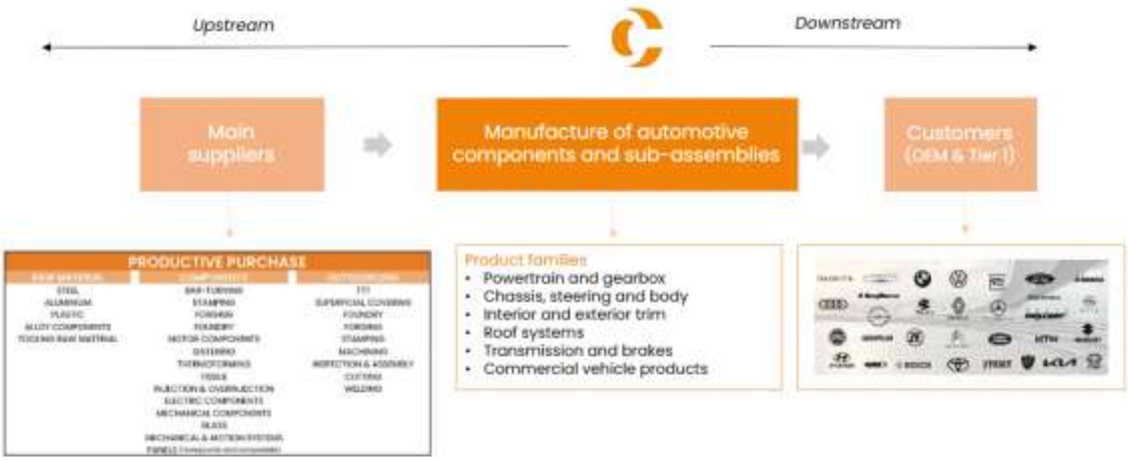
Under the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), the following subsidiaries are exempted from the obligation to publish individual Consolidated Non-Financial and Sustainability Reporting.

a) Subsidiaries within the European Union that comply with the CSRD but whose data are included in the group's consolidated Consolidated Non-Financial and Sustainability Reporting.
b) Subsidiaries in Spain subject to the Spanish Non-Financial Disclosures and Diversity Reporting Act [*Ley 11/2018 en materia de Información No Financiera y Diversidad*], which were exempt until the full entry into force of the CSRD in 2024.
c) Subsidiaries outside the scope of the CSRD.

CIE Automotive does not have any subsidiaries or affiliates to which these points apply.

ESRS 2- BP- 1-5 c) AR 1	*The undertaking shall disclose the following information:* ***(c) to what extent the sustainability statement covers the undertaking's upstream and downstream value chain (see ESRS 1 section 5.1 Reporting undertaking and value chain);***

This report takes into account CIE Automotive's value chain, both upstream, considering production suppliers, including raw material suppliers, which make up the vast majority of the Group's supply chain, and downstream, including its Original Equipment Manufacturers (OEM) and Tier 1 customers.



ESRS 2-BP- 1-5 d)	*The undertaking shall disclose the following information*: ***(d) whether the undertaking has used the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation (see ESRS 1 section 7.7 Classified and sensitive information and information on intellectual property, know-how or results of innovation); and***

In preparing the 2025 Consolidated Non-Financial and Sustainability Reporting, CIE Automotive has not omitted any specific item of information on intellectual property, know-how or the results of innovation, as set out in *ESRS 1, section 7.7. Classified and sensitive information and information on intellectual property, know-how or results of innovation).*

ESRS 2-BP- 1-5 e)	*The undertaking shall disclose the following information*: ***(e) for undertakings based in an EU member state that allows for the exemption from disclosure of impending developments or matters in the course of negotiation, as provided for in articles 19a(3) and 29a(3) of Directive 2013/34/EU, whether the undertaking has used that exemption.***

In preparing the 2025 Consolidated Non-Financial and Sustainability Reporting, CIE Automotive has not used the exemption from disclosure of impending developments or matters in the course of negotiation, as provided for in articles 19a(3) and 29a(3) of Directive 2013/34/EU.

1.1.1.2 DR BP-2: Disclosures in relation to specific circumstances

ESRS 2-BP-2-9 a)	*When the undertaking has deviated from the medium- or long-term time horizons defined by ESRS 1 section 6.4 Definition of short-, medium- and long-term for reporting purposes, it shall describe*: ***(a) its definitions of medium- or long-term time horizons***.

CIE Automotive has considered the following time horizons, aligned with section 6.4 of indicator ESRS 1:

- Short term: the same period adopted by the company as the reference period in its financial statements, i.e. the reporting period of financial year 2025.
- Medium-term time horizon: from the end of the short-term reporting period defined in (a) up to 5 years.
- Long term: over five years.

However, as stated in section *1.1.2.5 DR GOV-5: Risk management and internal controls over sustainability reporting*, ESRS indicator *2-GOV-5-36 e)*, the time horizon for climate risks varies, a time horizon of 2050 would be considered for them, in line with the company's temporal target for climate neutrality, established based on EU targets.

ESRS 2-BP- 2-9 b)	*When the undertaking has deviated from the medium- or long-term time horizons defined by ESRS 1 section 6.4 Definition of short-, medium- and long-term for reporting purposes, it shall describe*: ***(b) the reasons for applying those definitions***.

As stated in section 2.2.2.2. *DR related to ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model* in indicator *ESRS 2 - SBM-3- 19 b)* AR 7 and 13, various time horizons and climate change scenarios were included to make the analysis more robust.

Three climate horizons: optimist, intermediate and pessimist, and three-time scenarios:

- Current or short term: 2020-2025.
- Medium term: 2030.
- Long term: 2050.

In relation to the current or short term horizon, as stated in the response to ESRS indicator *2-SBM-3-19 b) AR 7* and 13, the current year 2025 is not indicated, but a period 2020-2025, given that many of the variables and parameters are not accessible for 2025, or are not accessible in 2025 in all geographical areas, therefore the closest data to 2025 that is accessible in all geographical areas is used, and in the worst case it could refer to 2020.

ESRS 2-BP-2-10 a); b); c); d)	*When metrics include upstream and/or downstream value chain data estimated using indirect sources, such as sector-average data or other proxies, the undertaking shall: (a) identify the metrics; (b) describe the basis for preparation;(c) describe the resulting level of accuracy; and (d) where applicable, describe the planned actions to improve the accuracy in the future (see ESRS 1 chapter 5 Value chain).*

Throughout this Consolidated Non-Financial and Sustainability Reporting, the requirements of this indicator will be included wherever data on upstream or downstream stages of the Value Chain are estimated using proxies, such as average sectoral data or other proxies.

The sustainability indicators included in this Consolidated Non-Financial and Sustainability Reporting are based on primary, secondary or modelled data, as appropriate. Where direct data cannot be obtained, estimates based on actual data trends, sectoral information or expert analysis were used, complying with the qualitative criteria defined by the European Sustainability Reporting Standards (ESRS).

Examples include the use of proxy data for emissions indicators along the Value Chain. All the information will be referenced and detailed where appropriate throughout this report.

In the context of an evolving report, it is anticipated that the calculation methodologies and available data will improve in the coming years. This may entail adjusting historical data or projected trajectories to better reflect the most recent and reliable information, especially in relation to information on the Value Chain.

ESRS 2-BP-2-11 a); b) i; b) ii	*In accordance with ESRS 1 section 7.2 Sources of estimation and outcome uncertainty, the undertaking shall: (a) identify the quantitative metrics and monetary amounts it has disclosed that are subject to a high level of measurement uncertainty; (b) in relation to each quantitative metric and monetary amount identified:* *i. disclose information about the sources of measurement uncertainty (for example, the dependence of the amount on the outcome of a future event, on a measurement technique or on the availability and quality of data from the entity's upstream and/or downstream value chain); and* *ii. disclose the assumptions, approximations and judgements the entity has made in measuring it*

As indicated in *ESRS 2-BP-2-10 a); b); c); d)*, the requirements of this indicator will be included throughout this Consolidated Non-Financial and Sustainability Reporting where sources of estimation and outcome uncertainty are included.

Examples include the use of proxy data for emissions indicators along the Value Chain. All the information will be referenced and detailed where appropriate throughout this report.

In the context of an evolving report, it is anticipated that the calculation methodologies and available data will improve in the coming years. This may entail adjusting historical data or projected trajectories to better reflect the most recent and reliable information, especially in relation to information on the Value Chain.

ESRS 2-BP-2–13 a); b); c)	*When changes in the preparation and presentation of sustainability information occur compared to the previous reporting period(s), (see ESRS 1 section 7.4 Changes in preparation or presentation in sustainability information), the undertaking shall: (a) explain the changes and the reasons for them, including why the replaced metric provides more useful information; (b) disclose revised comparative figures, unless it is impracticable to do so. When it is impracticable to adjust comparative information for one or more prior periods, the undertaking shall disclose that fact; and (c) disclose the difference between the figure disclosed in the preceding period and the revised comparative figure.*

Throughout this Consolidated Non-Financial and Sustainability Reporting, this indicator's requirements will be included when there have been changes in preparation or presentation in sustainability information compared to the previous reporting period(s).

As stated in indicator *ESRS 2-IRO-2-59*, given that in 2025 there have been no substantial changes in the company's activity in relation to its organisational and operational structure, nor any material changes in external factors, and in accordance with EFRAG guidelines in this regard, CIE Automotive confirms that the results of the materiality analysis for the 2024 financial year remain relevant for the 2025 financial year, and therefore the conclusions reached previously will be used in the preparation of the sustainability statement. Consequently, the same Impacts, Risks and Opportunities (IROs) analysis will be maintained in 2025.

It is worth highlighting the monitoring and approval in 2024 by the ESG Committee of the double materiality analysis, which identified material impacts, risks and opportunities (IROs) in the field of sustainability, facilitating the integration of this understanding into the company's management mechanisms, valid for 2025.

ESRS 2-BP-2–14 a); b); c)	*When the undertaking identifies material prior period errors (see ESRS 1 section 7.5 Reporting errors in prior periods), it shall disclose: (a) the nature of the prior period material error; (b) to the extent practicable, the correction for each prior period included in the sustainability statement; and (c) if correction of the error is not practicable, the circumstances that led to the existence of that condition.*

Throughout this Consolidated Non-Financial and Sustainability Reporting this indicator's requirements will be included when the company has detected material prior period errors.

ESRS 2-BP-2- 15	*When the undertaking includes in its sustainability statement information stemming from other legislation which requires the undertaking to disclose sustainability information or from generally accepted sustainability reporting standards and frameworks (see ESRS 1 section 8.2 Content and structure of the sustainability statement), in addition to the information prescribed by ESRS, it shall disclose this fact. In case of partial application of other reporting standards or frameworks, the undertaking shall provide a precise reference to the paragraphs of the standard or framework applied.*

In its Consolidated Non-Financial and Sustainability Reporting, CIE Automotive has included the disclosures required under the Non-Financial Information and Diversity Reporting Act, in addition to the disclosures required under the European Union's Corporate Sustainability Reporting Directive (CSRD).

This information is included in section 6. Indicators under the Non-Financial Disclosures and Diversity Reporting Act not covered by the European Sustainability Reporting Standards.

ESRS 2-BP-2- 16	*When the undertaking incorporates information by reference (see ESRS 1 section 9.1 Incorporation by reference), it shall disclose a list of the disclosure requirements of ESRS, or the specific datapoints mandated by a Disclosure Requirement, that have been incorporated by reference.*

Throughout this Consolidated Non-Financial and Sustainability Reporting, cross-references have been incorporated between the various disclosure requirements of the ESRS, as well as, where appropriate, cross-references to the Consolidated Financial Statements for the year ended 31 December 2025.

1.1.2 Governance

1.1.2.1 DR GOV-1: The role of the administrative, management and supervisory bodies

ESRS 2-GOV-1 –21 a)	*The undertaking shall disclose the composition of the administrative, management and supervisory bodies:* ***(a) the composition and diversity of the administrative, management and supervisory bodies****;*

Based on ESRS 2 Appendix C - Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures, this information is included in this report under *ESRS G1 4.1.1.1. ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*, indicators *ESRS 2 - GOV-1-5 a)* and *ESRS 2 - GOV-1-5 b).*

ESRS 2-GOV-1 –21 b)	*The undertaking shall disclose the composition of the administrative, management and supervisory bodies:* ***(b) representation of employees and other workers****;*

Based on ESRS 2 Appendix C - Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures, this information is included in this report under section *4.1.1.1. ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*, indicators *ESRS 2 - GOV-1-5 a) and ESRS 2 - GOV-1-5 b).*

ESRS 2-GOV-1 –21 c)	*The undertaking shall disclose the composition of the administrative, management and supervisory bodies:* ***(c) experience relevant to the sectors, products and geographic locations of the undertaking****;*

Based on ESRS 2 Appendix C - Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures, this information is included in this report under section *4.1.1.1. ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies, indicator ESRS 2 - GOV-1-5 b).*

ESRS 2-GOV-1 –21 d)	*The company will disclose the following information on the composition and diversity of the members of its administrative, management and supervisory bodies:* ***(d) percentage by gender and other aspects of diversity that the undertaking considers. The board's gender diversity shall be calculated as an average ratio of female to male board members.***

At year-end 2025, the Board of Directors of CIE Automotive had 12 members, five of whom are women and seven of whom are men. Thus, the ratio of females to males is 42%.

Based on ESRS 2 Appendix C - Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures, the details of the members of the Board are included in this report under section *4.1.1.1. ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*, indicator *ESRS 2 - GOV-1-5 a).*

ESRS 2-GOV-1 –21 e)	*The undertaking shall disclose the composition of the administrative, management and supervisory bodies:* ***(e) the percentage of independent board members****.* ***For undertakings with a unitary board, this corresponds to the percentage of independent non-executive board members. For undertakings with a dual board, it corresponds to the percentage of independent members of the supervisory body.***

At year-end 2025, the Board of Directors of CIE Automotive had 12 members, of whom three are independent, two are executive and seven are shareholder-nominated board members. As a result, the percentage of independent board members is 25%.

Based on ESRS 2 Appendix C - Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures, the details of the members of the Board are included in this report under section *4.1.1.1. ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*, indicator *ESRS 2 - GOV-1-5 a).*

ESRS 2-GOV-1 -22 a)	*The undertaking shall disclose the following information about the roles and responsibilities of the administrative, management and supervisory bodies;* ***(a) the identity of the administrative, management and supervisory bodies (such as a board committee or similar) or individual(s) within a body responsible for oversight of impacts, risks and opportunities****;*

Based on ESRS 2 Appendix C - Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures, the details of the members of the Board are included in this report under section *4.1.1.1. ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*, indicator *ESRS 2 - GOV-1-5 a).*

ESRS 2-GOV-1 – 22 b) AR 3	*The undertaking shall disclose the following information about the roles and responsibilities of the administrative, management and supervisory bodies;* ***(b) how each body's or individual's responsibilities for impacts, risks and opportunities are reflected in the undertaking's terms of reference, board mandates and other related policies****;*

CIE Automotive incorporates Environmental, Social and Governance (ESG) considerations into all its business decisions, from strategic planning to operational execution. With this approach, it not only responds to the demands of its customers and increasing sustainability regulation but also ensures long-term profitability by driving efficiency and innovation to minimise its negative impacts.

Oversight of ESG and sustainability management is the responsibility of the Board's ESG Committee, which has delegated the Horizontal ESG Committee to track how well these principles are being applied. This tracking is carried out by means of ESG indicators that measure the progress of the various areas. The indicators are included in the management plans of each plant and serve to monitor the evolution of the 2025 ESG Strategic Plan in aspects linked to sustainability.

It is worth highlighting the monitoring and approval in 2024 by the ESG Committee of the double materiality analysis, which identified material impacts, risks and opportunities (IROs) in the area of sustainability, facilitating the integration of this understanding into the company's management mechanisms, valid for 2025.

Duties of the ESG Committee

The Committee is constituted as an internal body of an informational and advisory nature without executive duties, with powers of information, consultancy and proposal within the scope of its operations.

For this purpose, the Committee will have the following responsibilities:

i. Promote the existence of a Code of Conduct in the Company, propose its adoption to the Board, along with subsequent amendments, and adopt the necessary measures to encourage awareness and compliance with the Code of Conduct.
ii. Issue the any reports that, within the scope of the matters within its competence, should be prepared in relation to complaints received by the Company through its whistleblowing channel or any other similar channel that may be established.
iii. Periodically review the environmental policies, including the climate change, social and corporate governance policies, and propose to the Board, for approval or forwarding to the General Shareholders Meeting, the amendments and updates that will contribute to the development and continuous improvement of company policies.
iv. Understand, promote, guide and supervise the corporate governance strategy and performance in the area of sustainability, and report on them to the Board.
v. Supervise compliance with legal requirements and other corporate governance legislation.
vi. Supervise and assess the processes related to the various stakeholders.
vii. Evaluate and review the Company's plans in the execution of the ESG responsibility policies and monitor their degree of compliance.
viii. Report on the performance by non-profit institutions linked to the Group regarding the general interest and ESG activities entrusted to them.
ix. Submit, before its approval, the Company's Annual Corporate Governance Report, gathering for this purpose the reports of the Audit and Compliance Committee and the Appointment and Remuneration Committee with regard to those sections of the report falling under their purview, and the Annual Report.
x. Any other duties resolved by the Company's Board.

It is important to note that the Board is ultimately responsible to all its stakeholders for the existence and operation of the company's Risk Management System (RMS), and it ensures its existence and design, and supervises it through the activities carried out by the Audit and Compliance Committee.

Duties of the Audit and Compliance Committee (ACC)

The Audit and Compliance Committee's function is to help the Company's Board supervise its financial and non-financial statements, and to exercise its oversight over CIE Automotive, S.A., and its Group companies.

For this purpose, the Committee will have the following responsibilities:

i. Periodically review the risk policies and propose amendments and updates to the Board.
ii. Approve the policy on hiring the auditor.
iii. Inform the General Shareholders Meeting on matters raised by shareholders that fall within the Committee's scope of competence.
iv. Supervise the effectiveness of the internal control mechanisms of the Company and its Group, as well as its system for managing financial and non-financial risks, including tax risks and risks related to corruption.
v. Generally ensure that the established internal control policies and systems are being implemented effectively in practice.
vi. Analyse, together with the auditors, any major weaknesses of the internal control system detected during the audit.
vii. Supervise the process for preparing and reporting regulated financial and non-financial information.
viii. Propose to the Board, for submission to the General Shareholders Meeting, the appointment, re-election or replacement of the auditors, as well as the terms of their engagement, in accordance with the applicable legislation, and to regularly receive information about the audit plan and its execution from the auditors, as well as preserving their independence in the exercise of their functions.
ix. Supervise the activity of the Compliance and Internal Audit areas, which will report fee on the Audit and Compliance Committee and ensure their independence.
x. Propose the selection, appointment and dismissal of the heads of the Compliance and Internal Audit services; propose the budget for these services; approve their focus and annual work plan, ensuring that their activity is mainly focused on relevant risks; receive regular reports on their activities; and verify that senior management takes into account the conclusions and recommendations of their reports.
xi. Establish the appropriate relationships with auditors or audit firms for the purpose of receiving information on any matter that may compromise their independence, to be examined by the Audit Committee, and any other matter relating to the process of auditing the accounts, in addition to any other communication laid down in legislation regarding auditing of accounts and auditing standards.
xii. In any event, the audit committee should annually receive from the external auditor written confirmation of the latter's independence versus the Company or institutions directly or indirectly related to the Company, as well as information on additional services of any kind provided by the above auditor or by related persons or institutions and the fees received from those entities, in accordance with the legislation governing the auditing of accounts.
xiii. Annually issue, prior to the issuance of the audit report, a report in which it expresses an opinion on the independence of the auditor. This report must contain, in any case, a summary of the additional services provided as referred to in the above paragraph, in the terms established by law.
xiv. Inform the Board in advance of the financial and non-financial information that, due to the Company's listed status, it must periodically make public, ensuring that the interim financial statements are prepared with the same accounting criteria as the financial statements and, for this purpose, consider the appropriateness of a limited review by the auditor.
xv. Inform the Board, prior to passing the relevant resolution, of the creation or acquisition of equity investments in special-purpose vehicles or entities domiciled in countries or territories considered to be tax havens, as well as any other transactions or operations of a similar nature that, due to their complexity, could diminish the Group's transparency.
xvi. Generally supervise the functioning of the whistleblowing channel or any other similar channel established, receiving regular information on the functioning of the channel (at least the number of complaints received, their origin and types, and the results of the investigations, together with the measures and lines of action proposed or adopted), proposing the appropriate actions to improve its functioning and reduce the risk of irregularities in the future, with the possibility of bringing in other committees, the internal audit function (including the Compliance Officer) or an external adviser when, due to the case's importance or complexity, this is considered appropriate.
xvii. Any other duties decided by the Company's Board or that are attributed to it by the corporate or accounting legislation in force from time to time.

ESRS 2-GOV-1 – 22 c) i AR 4	*The undertaking shall disclose the following information about the roles and responsibilities of the administrative, management and supervisory bodies:* ***(c) a description of management's role in the governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities, including:*** ***whether that role is delegated to a specific management-level position or committee and how oversight is exercised over that position or committee;***

It is important to note that the Board is ultimately responsible to all its stakeholders for the existence and operation of the company's Risk Management System (RMS), and it ensures its existence and design, and supervises it through the activities carried out by the Audit and Compliance Committee.

As stated in *ESRS 2-GOV-1 -22 b) AR 3,* the Audit and Compliance Committee is responsible for overseeing the process of preparing and presenting the required financial and non-financial information. However, oversight of ESG and sustainability management is the responsibility of the Board's ESG Committee, which has delegated the Horizontal ESG Committee to track how well these principles are being applied. This tracking is carried out by means of ESG indicators that measure the progress of the various areas. The indicators are included in the management plans of each plant and serve to monitor the evolution of the 2025 ESG Strategic Plan in aspects linked to sustainability.

It is worth highlighting the monitoring and approval in 2024 by the ESG Committee of the double materiality analysis, which identified material impacts, risks and opportunities (IROs) in the area of sustainability, facilitating the integration of this understanding into the company's management mechanisms and thus progressing towards their effective management. This analysis is valid for the 2025 financial year.

The industrial conglomerate's social responsibility extends to its supply chain. CIE Automotive has a Supplier Platform for managing and assessing ESG aspects.

All the information is consolidated in a global ESG scorecard, kept on the group's corporate intranet, and its evolution is reported to the ESG Committee and the CEO, who makes the Horizontal ESG Committee responsible for monitoring each indicator.

The Board and the Management Committee are engaged in the fight against climate change. The ultimate responsibility for environment-related activities rests with the Board. Within the Board, the environmental representative is the ESG Committee. The chair of this committee has experience and knowledge regarding climate change.

The company's CEO, in turn, is involved in sustainable growth and is ultimately responsible for the achievement of the Strategic Plan, which integrates the ESG Plan. The ESG Committee is a body that reports and makes proposals to CIE Automotive's ESG Committee.

ESRS 2-GOV-1 – 22 c) ii	*The undertaking shall disclose the following information about the roles and responsibilities of the administrative, management and supervisory bodies:* ***(c) a description of management's role in the governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities, including:*** ***ii. information about the reporting lines to the administrative, management and supervisory bodies;***

All the sustainability information from the 2025 ESG Strategic Plan is consolidated in a global ESG scorecard, kept on the group's corporate intranet, and its evolution is reported to the ESG Committee and the CEO, who makes the Horizontal ESG Committee responsible for monitoring each indicator.

This tracking is carried out by means of ESG indicators that measure the progress of the various areas. The indicators are included in the management plans of each plant and serve to monitor the evolution of the 2025 ESG Strategic Plan in aspects linked to sustainability.

It is worth highlighting the monitoring and approval in 2024 by the ESG Committee of the double materiality analysis, which identified material impacts, risks and opportunities (IROs) in the area of sustainability, facilitating the integration of this understanding into the company's management mechanisms and thus progressing towards their effective management. This analysis is valid for the 2025 financial year.

Lastly, it should again be emphasised that the Board is ultimately responsible to all the stakeholders for the existence and functioning of the company's Risk Management System (RMS), and it guarantees its existence and design, and it supervises it through the activities carried out by the Audit and Compliance Committee, which, as stated in *ESRS 2-GOV-1 -22 b) AR 3*, is responsible for supervising the process of preparing and presenting the mandatory financial and non-financial information.

However, oversight of ESG and sustainability management is the responsibility of the Board's ESG Committee, which has delegated the Horizontal ESG Committee to track how well these principles are being applied. This tracking is carried out by means of ESG indicators that measure the progress of the various areas. The indicators are included in the management plans of each plant and serve to monitor the evolution of the 2025 ESG Strategic Plan in aspects linked to sustainability.

ESRS 2-GOV-1 – 22 c) iii	*The undertaking shall disclose the following information about the roles and responsibilities of the administrative, management and supervisory bodies*: ***(c) a description of management's role in the governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities, including:*** ***iii. whether dedicated controls and procedures are applied to the management of impacts, risks and opportunities and, if so, how they are integrated with other internal functions;***

Compliance with the 2025 ESG Strategic Plan in the area of sustainability is tracked Environmental, Social and Governance (ESG) indicators that measure the progress of the various areas. The indicators are included in the management plans of each plant and serve to monitor the evolution of the 2025 ESG Strategic Plan in aspects linked to sustainability.

These indicators are linked to compliance with certain controls that mitigate certain sustainability risks included in the company's general Risk Map, which is updated annually.

It is worth highlighting the monitoring and approval in 2024 by the ESG Committee of the double materiality analysis, which identified material impacts, risks and opportunities (IROs) in the area of sustainability, facilitating the integration of this understanding into the company's management mechanisms and thus progressing towards their effective management. This analysis is valid for the 2025 financial year.

ESRS 2-GOV-1 – 22 d)	*The undertaking shall disclose the following information about the roles and responsibilities of the administrative, management and supervisory bodies*: ***(d) how the administrative, management and supervisory bodies and senior executive management oversee the setting of targets related to material impacts, risks and opportunities, and how they monitor progress towards them.***

The Board is ultimately responsible to all its stakeholders for the existence and operation of the company's Risk Management System (RMS), and it ensures its existence and design, and supervises it through the activities carried out by the Audit and Compliance Committee.

As stated in *ESRS 2-GOV-1 -22 b) AR 3,* the Audit and Compliance Committee is responsible for overseeing the process of preparing and presenting the required financial and non-financial information. However, oversight of Environmental, Social and Governance (ESG) and sustainability matters is the responsibility of the Board's ESG Committee, which has delegated the Horizontal ESG Committee to track how well these principles are being applied. This tracking is carried out by means of ESG indicators that measure the progress of the various areas. The indicators are included in the management plans of each plant and serve to monitor the evolution of the 2025 Strategic Plan in aspects linked to sustainability.

All the information is consolidated in a global ESG scorecard, kept on the group's corporate intranet, and its evolution is reported to the ESG Committee and the CEO, who makes the Horizontal ESG Committee responsible for monitoring each indicator.

The targets included in the 2025 ESG Strategic Plan, published in 2021, are not directly related to the material impacts, risks and opportunities identified during the dual materiality assessment. However, they will be taken into account in the new Strategic Sustainability Plan that will be prepared and published.

ESRS 2-GOV-1 – 23 a) AR 5	*The disclosure shall include a description of how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee sustainability matters, including:* ***(a) the sustainability-related expertise that the bodies, as a whole, either directly possess or can leverage, for example through access to experts or training;***

Based on ESRS 2 Appendix C - Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures, the details of the members of the Board are included in this report under section *4.1.1.1. ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*, indicator *ESRS 2 - GOV-1-5 a)*.

It should be noted that in 2023 the focus was placed on the training of Board members in matters relating to sustainability in general, good governance and the new reporting, taxonomy and environmental legislation, without leaving social aspects behind. A specific training session was given to all the Board members, a more general session was given on a training platform to the rest of the organisation, and an exclusive session was given to the members of the ESG Committee together with the members of the Horizontal ESG Committee. All of this is in line with the company's commitment to making firm progress in these aspects, which are integrated into its business model and corporate strategy.

In 2024, to ensure continuity, CIE Automotive provided training to all company personnel, including members of the Board of Directors, on the Code of Professional Conduct, which, in addition to being the cornerstone of all the Group's corporate policies and procedures, is the document that sets out the standards of conduct expected of all company personnel, including those relating to sustainability.

In 2025, not only has training in the area of the Code of Professional Conduct been maintained, but a new global training project has also been launched in the area of corruption prevention, identification and how to deal with conflicts of interest, which will be mandatory for all company personnel, including members of the Board of Directors.

ESRS 2-GOV-1 – 23 b)	*The disclosure shall include a description of how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee sustainability matters, including:* ***(b) how those skills and expertise relate to the undertaking's material impacts, risks and opportunities.***

Based on ESRS 2 Appendix C - Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2 General Disclosures, the expertise and experience of the members of the Board are included in this report under section *4.1.1.1. ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies*, indicator *ESRS 2 - GOV-1-5 a)*.

The Board is ultimately responsible to all its stakeholders for the existence and operation of the company's Risk Management System (RMS), and it ensures its existence and design, and supervises it through the activities carried out by the Audit and Compliance Committee.

As stated in *ESRS 2-GOV-1 -22 b) AR 3,* the Audit and Compliance Committee is responsible for overseeing the process of preparing and presenting the required financial and non-financial information. However, oversight of Environmental, Social and Governance (ESG) and sustainability matters is the responsibility of the Board's ESG Committee, which has delegated the Horizontal ESG Committee to track how well these principles are being applied. This tracking is carried out by means of ESG indicators that measure the progress of the various areas. The indicators are included in the management plans of each plant and serve to monitor the evolution of the 2025 Strategic Plan in aspects linked to sustainability.

The Board and the Management Committee are engaged in the fight against climate change. The ultimate responsibility for environment-related activities rests with the Board. Within the Board, the environmental representative is the ESG Committee. The chair of this committee has experience and knowledge regarding climate change.

The company's CEO, in turn, is involved in sustainable growth and is ultimately responsible for the achievement of the Strategic Plan, which integrates the 2025 ESG Plan. The ESG Committee is a body that reports and makes proposals to CIE Automotive's ESG Committee.

It is important to highlight that, when preparing the dual materiality assessment, not only was supervision and approval of the result required from the ESG Committee, but they were also involved in the project from the start, actively contributing value through their knowledge of the sector and the company, as well as through the knowledge they have gained in this area throughout their extensive careers. They made this contribution both during the three internal meetings of the ESG Committee where the project was discussed, and through individual interviews with the external consultant that assisted CIE Automotive in the dual materiality assessment.

1.1.2.2 DR GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

ESRS 2-GOV-2 – 26 a)	*The undertaking shall disclose the following information: (a) whether, by whom and how frequently the administrative, management and supervisory bodies, including their relevant committees, are informed about material impacts, risks and opportunities (see Disclosure Requirement IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities of this Standard), the implementation of due diligence, and the results and effectiveness of policies, actions, metrics and targets adopted to address them;*

CIE Automotive has implemented, updated and enhanced a Risk Management and Control System (RMS) to mitigate risks that, should they materialise, could threaten its strategic goals. Similarly, the RMS is a system where work is already underway to also include the management of the impacts and opportunities that are affecting or may affect the company. This model, developed in its Risk Management and Control Policy, follows the methodology of the ISO 31000 standard.

CIE Automotive's risk management system provides reasonable assurance of the prevention, identification, assessment and ongoing monitoring of all the material impacts, risks and opportunities, covering strategic, operational, financial, environmental, social and governance (ESG) aspects, as well as compliance. While the current RMS is primarily focused on managing the company's risks, it will be enhanced to include managing impacts and opportunities.

These risks, approved annually by the Board, are managed in accordance with the established risk appetite and tolerance levels. The model, included under the Risk Control and Management Policy, follows ISO 31000 methodology and is under the direct responsibility of the Board, which has delegated its supervision and correct functioning to the Audit and Compliance Committee, with the participation of the ESG Committee in areas directly related to sustainability.

While in 2024 the participation of the Chair of the ESG Committee, and even the Chair and CEO of the company, in the preparation of the double materiality analysis was noteworthy, in 2025 a dynamic of monitoring the results in the various Board committees held has been followed. As in 2024, members of senior management and the management team were present at these committees, where the main topic was to monitor the results and actions of the double materiality analysis carried out in 2024.

A general Risk Map is drawn up annually, with around 300 people participating in 2025. All those involved responded by considering the scope of each risk within the 2026-2030 time frame, except in the case of climate risk, which has a 2050 time frame, and for its geographical and technological scope, meaning that some people may assess a risk for more than one region and more than one technology.

This process is coordinated by the Compliance Body, which annually submits the result to the Audit and Compliance Committee for supervision and approval and subsequently reports to the Board. In addition, this Risk Map is also presented to the ESG Committee for its information.

As in previous years, the analysis of the international and national context in which the company operates, taking as a reference studies and analyses such as those of the World Economic Forum, was the basis for drawing up the global Risk Map, by region and technology, which shows an estimate in euros of the impact on EBITDA of the possible materialisation of each risk, according to the defined parameters, as well as the evolution of the main risks in the last two years in all the detailed categories. The map also shows the total number of controls launched in the year for each region and technology, and internal control compliance by plant, with details of the controls, risk owners and specific evidence. The entire process is monitored by the SAP GRC internal management tool.

ESRS 2-GOV-2 – 26 b)	*The undertaking shall disclose the following information: (b) how the administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing the undertaking's strategy, its decisions on major transactions, and its risk management process, including whether they have considered trade-offs associated with those impacts, risks and opportunities;*

The persons with responsibility for implementing this policy are CIE Automotive's Board members and the internal employees, all within their scope of management, and in each case, they must coordinate their responses to the impacts, risks and opportunities with any other management bodies and departments affected.

In this context, the roles and responsibilities of each of the members of the organisation involved in the Risk Management System ("RMS"), a system in which work is already underway to also include managing impacts and opportunities, are as follows:

Body	Responsibilities
Board of Directors *(via the Audit and Compliance Committee)*	✓ Highest level of responsibility to the stakeholders for the existence and functioning of the RMS. ✓ Ensuring the existence and suitable design of the RMS. ✓ Overseeing the RMS via the activities performed by the ACC.
Compliance Body	✓ Responsible for designing and implementing the RMS, and for its functioning. ✓ Defining CIE Automotive's methodology, procedures, and criteria for identifying, assessing, classifying, approving, and responding to risks. ✓ Responsible for producing the Risk Map. ✓ Designing controls to prevent or mitigate identified risks and monitor compliance. ✓ Periodic reporting to the ACC regarding the evolution of the risks and the overall functioning of the RMS.
Internal Audit Department	✓ Assessing the effectiveness of the RMS and reporting periodically to the ACC, Senior Management, and Management Team, regarding any weaknesses detected and scheduling of the proposed corrective measures, in addition to proposing recommendations to improve them.
Senior Management and Management Team	✓ Identifying and assessing impacts, risks and opportunities. ✓ Ensuring implementation and conveyance of a risk-focused culture at the company. ✓ Defining, establishing and/or modifying the risk tolerance level, which must be sent to the Board for its approval. ✓ Approving the plans and actions proposed by the Compliance Body that could be considered necessary for addressing the identified risks. ✓ Conducting a dynamic self-assessment process containing information on compliance with policies and procedures, the controls in place, and the risks arising from its day-to-day activities. ✓ Reporting to the Compliance Body on an annual basis on the evolution of risks, the prevention measures adopted, and the additional measures proposed.
Other own employees	✓ Persons responsible for identifying risks that threaten compliance with their objectives, and reporting these to the person responsible from the area. ✓ Collaborating with the persons responsible from the area during risk assessment and classification; proposing action plans to handle the identified risks; and collaborating during execution of those plans.

Table showing the separation of duties for the RMS:

	Board	Compliance Body	Internal Audit Department	Senior Management and Management Team	Other own employees
Risk identification		X		X	X
Risk assessment		X		X	
Risk handling		X			
Risk oversight	X	X	X		
Updating		X		X	
Breaches			X		X

ESRS 2-GOV-2 – 26 c)	*The undertaking shall disclose the following information: (c) a list of the material impacts, risks and opportunities addressed by the administrative, management and supervisory bodies, or their relevant committees during the reporting period.*

A list of the material impacts, risks and opportunities addressed by the administrative, management and supervisory bodies, or their relevant committees during the reporting period is provided below. These IROs will be managed directly by Senior Management and the Management Team and will form part of the new Strategic Sustainability Plan to be developed after the current 2025 ESG Strategic Plan comes to an end in 2025.

Category	ESRS	Topic	Subtopic	Sub-subtopic	Description of the IRO
Impact	E1	Climate change	Climate change mitigation	N/A	Use of environmentally friendly materials such as green steel coils and recycled resins.
Impact	E1	Climate change	Climate change adaptation	N/A	Generation of greenhouse gas emissions associated with energy-intensive material production processes. This would be the case for the production of materials such as steel coils and aluminium ingots.
Impact	E1	Climate change	Climate change mitigation	N/A	Contributing to the decarbonisation of transport by building components for electric vehicles.
Impact	E1	Climate change	Energy	N/A	Reducing emissions of pollutants by self-generating green energy.
Risk and Opportunity	E1	Climate change	Climate change adaptation	N/A	Financial impacts arising from: Accompanying the company's suppliers in the adoption of environmental management systems, which facilitates traceability and control of ESG data in the upstream Value Chain.
Risk and Opportunity	E1	Climate change			Increasing the price of emission allowances.
Risk and Opportunity	E1	Climate change			Development of environmental legislation imposing more stringent climate change mitigation and adaptation targets.
Risk and Opportunity	E1	Climate change			Varying degrees of maturity of suppliers on ESG issues, e.g. renewable energy use, carbon footprint, workers' rights, etc.
Risk and Opportunity	E1	Climate change	Climate change mitigation	N/A	Financial impacts arising from: Contribution to the decarbonisation of transport through the manufacture of components for electric vehicles.
Risk and Opportunity	E1	Climate change	Energy	N/A	Financial effects derived from: Reduction of pollutant emissions through self-generation of green energy.
Risk and Opportunity	E1	Climate change	Climate change mitigation	N/A	Financial effects derived from: Generation of emissions linked to the company's data centres.
Impact	E2	Pollution	Air pollution	N/A	Air pollution associated with generation of Scope 3 emissions.
Impact	E2	Pollution	Water pollution	N/A	Reduced potable water consumption due to increased use of recycled water.
Impact	E2	Pollution	Air pollution	N/A	Reduction of Scope 1 and 2 emissions due to the use of renewable energy and self-generation of energy to supply the company's facilities.

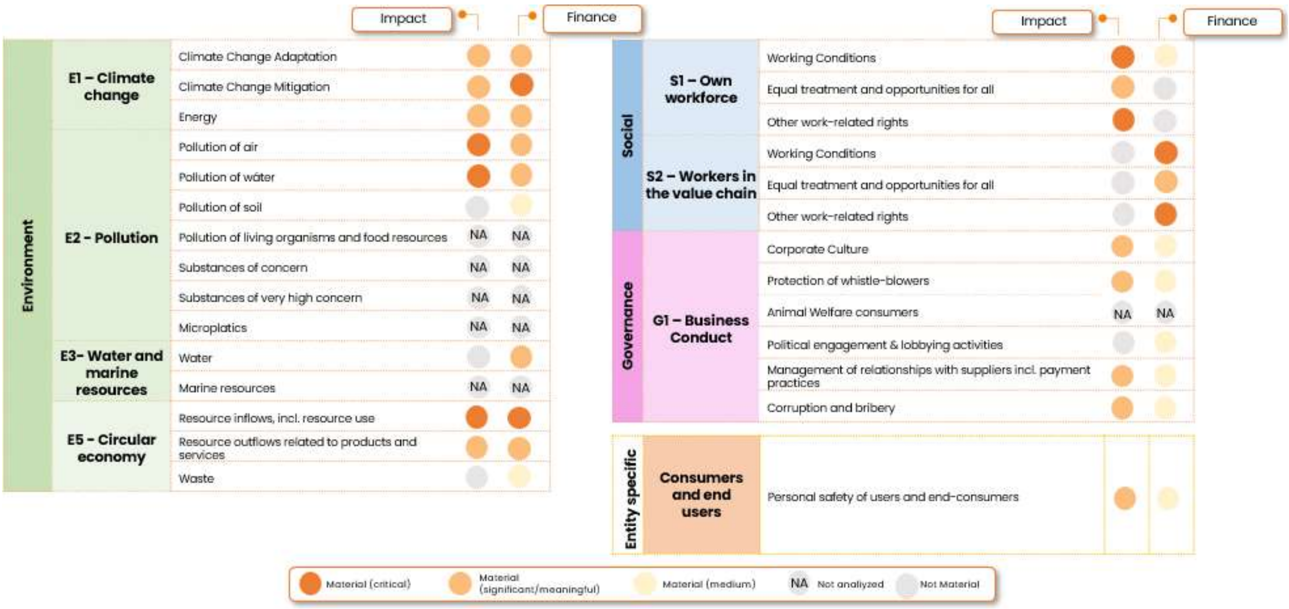
Category	ESRS	Topic	Subtopic	Sub-subtopic	Description of the IRO
Impact	E2	Pollution	Air pollution	N/A	Increase in the company's environmental footprint due to selling parts manufactured in other geographic locations to meet the requirements of certain customers.
Risk and Opportunity	E2	Pollution	Pollution of soil	N/A	Financial impacts arising from: Soil contamination through chemical soil erosion during the extraction of raw materials.
Risk and Opportunity	E2	Pollution	Air pollution	N/A	Financial effects arising from: Increase in the company's environmental footprint due to the marketing of components manufactured in other geographical locations to meet the requirements of certain customers.
Risk and Opportunity	E2	Pollution	Water pollution	N/A	Financial impacts arising from: Increased eutrophication of seawater as a result of discharges from non-recycled water.
Risk and Opportunity	E2	Pollution	Water pollution	N/A	Financial effects arising from: Increased ecotoxicity of freshwater as a result of non-recycled waste in production processes.
Risk and Opportunity	E2	Pollution	Air pollution	N/A	Financial effects due to: Reduction of Scope 1 and 2 emissions as a result of the use of renewable energy and self-generation of energy to supply the company's facilities.
Impact	E3	Water and marine resources	Water	Extraction of water	Decrease in the volume and quality of water sources near the plants due to the intensive use of this resource, especially in industrial processes that require processing materials at high temperatures.
Impact	E3	Water and marine resources	Water	Water consumption	Increased water consumption due to increased production of products linked to water-intensive technologies.
Impact	E5	Circular economy	Resource inputs, including resource use	N/A	Use of recycled materials in production processes involving aluminium.
Impact	E5	Circular economy	Resource inputs, including resource use	N/A	Use of returnable packaging that can be used for other products, thus reducing waste and extending the packages' life cycle.
Impact	E5	Circular economy	Resource inputs, including resource use	N/A	Internal reuse of returns from the company's various production processes through its own recycling system.
Impact	E5	Circular economy	Resource outflows related to products and services	N/A	Development of products under eco-design criteria and with a life cycle approach that improves their reparability, disassembly and separation, and thus increases their recyclability.
Impact	E5	Circular economy	Resource outflows related to products and services	N/A	Recirculation of water from high-temperature material processing through internal water treatment systems and facilities.
Impact	E5	Circular economy	Resource inputs, including resource use	N/A	Reduction in the volume of materials used in production processes due to a reduction in the gross weight of the products manufactured by the company.

Category	ESRS	Topic	Subtopic	Sub-subtopic	Description of the IRO
Risk and Opportunity	E5	Circular economy	Waste	N/A	Financial impacts arising from: Generation of toxic waste during the process of extracting raw materials.
Risk and Opportunity	E5	Circular economy	Waste	N/A	Financial impacts arising from: Generation of waste associated with the use of technical plastics.
Risk and Opportunity	E5	Circular economy	Waste	N/A	Financial impacts arising from: Sale of non-recyclable steel waste to local suppliers for reuse.
Risk and Opportunity	E5	Circular economy	Resource inputs, including resource use	N/A	Financial effects derived from: Internal reuse of returns from the company's different production processes through its own recycling system.
Risk and Opportunity	E5	Circular economy	Resource outflows related to products and services	N/A	Financial effects derived from: Development of products under eco-design criteria and with a life cycle approach, which improves the reparability of products, their disassembly and separation, thus increasing their recyclability.
Impact	ES	Consumers	Personal safety of users and end-consumers	Personal safety	Designing more robust parts that help boost vehicle safety.
Risk and Opportunity	ES	Consumers	Personal safety of users and end-consumers	Personal safety	Financial effects arising from: Design of more robust parts with an impact on increased vehicle safety.
Impact	G1	Business conduct	Corporate culture	N/A	High security of OEM data, including information relating to part moulds and prototypes.
Impact	G1	Business conduct	Corporate culture	N/A	Fostering a corporate culture of high ethical standards, transparency and integrity.
Impact	G1	Business conduct	Corporate culture	N/A	Promotion of a corporate culture that includes respect for human rights as a pillar through awareness-raising and training of professionals.
Impact	G1	Business conduct	Corruption and bribery	Prevention and detection	Existence of cases of corruption, fraud, bribery and money laundering, among other illicit practices.
Impact	G1	Business conduct	Corruption and bribery	Prevention and detection	Ineffectiveness of the Whistleblowing Channel for detecting and punishing illicit practices.
Impact	G1	Business conduct	Corruption and bribery	Prevention and detection	Breaches of the principles of the Code of Ethics and loss of trust among the company's stakeholders.
Impact	G1	Business conduct	Management of relationships with suppliers, including payment practices	N/A	Relations with suppliers based on objectivity, transparency and fair and non-discriminatory treatment.
Impact	G1	Business conduct	Protection of whistleblowers	N/A	Economic or social duress on employees of the company or its Value Chain, placed on them by powerful figures in the company because they filed complaints.
Impact	G1	Business conduct	Management of relationships with suppliers, including payment practices	N/A	Helping suppliers develop their processes by partnering with them.

Category	ESRS	Topic	Subtopic	Sub-subtopic	Description of the IRO
Risk and Opportunity	G1	Business conduct	Corporate culture	N/A	Financial impacts arising from: Increasing information security demands from the OEMs.
Risk and Opportunity	G1	Business conduct	Political participation and lobbying	N/A	Financial impacts arising from: Promotion of ESG issues through participation in key automotive associations and clusters.
Risk and Opportunity	G1	Business conduct	Political participation and lobbying	N/A	Financial impacts arising from: Collaboration with Public Administrations as a key Stakeholder Group to achieve improved services for communities.
Risk and Opportunity	G1	Business conduct	Management of r elationships with suppliers, includin g payment practices	N/A	Financial effects arising from: Contribution to the development of suppliers' processes through the establishment of partners.
Risk and Opportunity	G1	Business conduct	Corporate culture	N/A	Financial effects derived from: Promotion of a corporate culture that includes respect for human rights as a backbone through awareness-raising and training of professionals.
Risk and Opportunity	G1	Business conduct	Corruption and bribery	Prevention and detection	Financial effects derived from: Corruption cases involving company employees and local authorities.
Risk and Opportunity	G1	Business conduct	Corruption and bribery	Prevention and detection	Financial effects derived from: Corruption cases and non-compliance with requirements by clients (OEMs).
Risk and Opportunity	G1	Business conduct	Management of r elationships with suppliers, includin g payment practices	N/A	Financial effects arising from: Relations with suppliers based on objectivity, transparency and fair, non-discriminatory treatment.
Risk and Opportunity	N/A	Strategic			Supply chain disruptions as a result of geopolitical conflicts, natural disasters or health crises.
Risk and Opportunity	N/A	Strategic			Development of non-financial reporting legislation requiring the publication of sensitive and/or confidential company data and information.
Impact	S1	Own workforce	Working conditions (own workers)	Secure employmen t	Job and financial security for workers through stable long-term employment opportunities.
Impact	S1	Own workforce	Equal treatment and op portunities for all (own workers)	Training and skills developme nt	Training policies that promote professional development and careers.
Impact	S1	Own workforce	Equal treatment and op portunities for all (own workers)	Measures against violence and harassment in the workplace	Cases of violence or harassment due to discrimination (racial, gender or sexual) in the company.
Impact	S1	Own workforce	Equal treatment and op portunities for all (own workers)	Diversity	Lack of representation of women in management and executive positions in the company.

Category	ESRS	Topic	Subtopic	Sub-subtopic	Description of the IRO
Impact	S1	Own workforce	Other work-related rights	Forced labour	Vulnerable workers, especially cross-border workers, due to modern slavery practices in the company's facilities.
Impact	S1	Own workforce	Other work-related rights	Child labour	Lack of protection for children due to cases of child labour in the company's plants.
Risk and Opportunity	S1	Own workforce	Working conditions (own workers)	Secure employmen t	Financial impacts arising from: Increased job insecurity due to outsourcing operations to BRICs countries.
Risk and Opportunity	S1	Own workforce	Working conditions (own workers)	Work-life balance	Financial impacts arising from: Work-life balance due to working conditions including flexible working hours and measures to combat excessive working hours.
Risk and Opportunity	S1	Own workforce	Working conditions (own workers)	Health and safety	Financial impacts arising from: Fatalities due to accidents during working hours.
Risk and Opportunity	S1	Own workforce	Working conditions (own workers)	Secure employmen t	Financial impacts arising from: Job losses and reduced value generation due to downsizing in company plants.
Risk and Opportunity	S2	Workers in the value chain	Equal treatment and opportunities for all in the Value Chain	Diversity	Financial impacts arising from: Increased diversity and inclusion of employees in the Value Chain due to the company's influence to improve ESG policies.
Risk and Opportunity	S2	Workers in the value chain	Equal treatment and opportunities for all in the Value Chain	Measures against violence and harassment in the workplace	Financial impacts arising from: Cases of violence or harassment due to discrimination (racial, gender or sexual) on the premises of the companies in the Value Chain.
Risk and Opportunity	S2	Workers in the value chain	Other work-related rights	Forced labour	Financial impacts arising from: Unprotection of vulnerable workers, especially cross-border workers, due to modern slavery practices in suppliers' facilities.
Risk and Opportunity	S2	Workers in the value chain	Other work-related rights	Child labour	Financial impacts arising from: De-protection of children due to the presence of child labour on suppliers' premises.
Risk and Opportunity	S2	Workers in the value chain	Working conditions in the value chain	Freedom of association	Financial impacts arising from: Infringement of the right to freedom of association of workers in the value chain due to the lack of control of ethical commitments by the company.
Risk and Opportunity	S2	Workers in the value chain	Working conditions in the value chain	Health and safety	Financial effects derived from: Decrease in the accident rate in the value chain thanks to the efficiency of the monitoring and controls carried out on suppliers within the framework of contracts with the company.

In addition, the final results of the double materiality analysis carried out in 2024 and validated in 2025 are shown below in table form, indicating which issues are material and their importance.



1.1.2.3 DR GOV-3: Integration of sustainability-related performance in incentive schemes

ESRS 2-GOV-3–29 a) AR 7	*The undertaking shall disclose the following information about the incentive schemes and remuneration policies linked to sustainability matters for members of the undertaking's administrative, management and supervisory bodies, where they exist: **(a) a description of the key characteristics of the incentive schemes***

In 2025, members of the company's senior management had an incentive scheme linked to sustainability matters. Sustainability at CIE Automotive was measured by compliance with the objectives and indicators of the 2025 ESG Strategic Plan.

ESRS 2-GOV-3–29 b)	*The undertaking shall disclose the following information about the incentive schemes and remuneration policies linked to sustainability matters for members of the undertaking's administrative, management and supervisory bodies, where they exist: **(b) whether performance is being assessed against specific sustainability-related targets and/or impacts, and if so, which ones**;*

Performance is being assessed against the specific targets and impacts related to the objectives and indicators of the 2025 ESG Strategic Plan.

ESRS 2-GOV-3–29 c)	*The undertaking shall disclose the following information about the incentive schemes and remuneration policies linked to sustainability matters for members of the undertaking's administrative, management and supervisory bodies, where they exist: **(c) whether and how sustainability-related performance metrics are considered as performance benchmarks or included in remuneration policies.***

The degree of compliance with the objectives and indicators of the 2025 ESG Strategic Plan are considered as benchmarks of sustainability-related performance.

ESRS 2-GOV-3–29 d)	*The undertaking shall disclose the following information about the incentive schemes and remuneration policies linked to sustainability matters for members of the undertaking's administrative, management and supervisory bodies, where they exist: **(d) the proportion of variable remuneration dependent on sustainability-related targets and/or impacts**.*

In 2025, the proportion of variable remuneration dependant on sustainability-related targets or impacts was 10% of total incentives, which are a percentage of gross remuneration, with the percentage varying according to the responsibilities of each member of senior management.

ESRS 2-GOV-3-29 e)	*The undertaking shall disclose the following information about the incentive schemes and remuneration policies linked to sustainability matters for members of the undertaking's administrative, management and supervisory bodies, where they exist: **(e) the level in the undertaking at which the terms of incentive schemes are approved and updated**.*

The CEO is the level in the company at which the terms of incentive sustainability-related schemes are approved and updated.

1.1.2.4 DR GOV-4: Statement on due diligence

ESRS 2-GOV-4-30; 32 AR 8-AR 10	*The undertaking shall provide a mapping that explains how and where its application of the main aspects and steps of the due diligence process are reflected in its sustainability statement, to allow a depiction of the actual practices of the undertaking with regard to due diligence.*

CORE ELEMENTS OF DUE DILIGENCE	SECTIONS IN THE CONSOLIDATED NON-FINANCIAL AND SUSTAINABILITY REPORTING
a) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies; ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
b) Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 GOV-2 ESRS 2 SBM-2: Interests and views of stakeholders ESRS 2 IRO-1 ESRS 2 MDR-P Thematic ESRS: - DR S1-1 – Policies related to own workforce. - ESRS S2-1 – Policies related to value chain workers - DR G1-2 – Management of relationships with suppliers
c) Identifying and assessing adverse impacts	ESRS 2 IRO-1 (including Application Requirements related to specific sustainability matters in the relevant ESRS); ESRS SBM-3 Thematic ESRS: - DR S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns - DR G1-3 – Prevention and detection of corruption and bribery
d) Taking actions to address those adverse impacts	ESRS 2 MDR- A Thematic ESRS: - DR S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions - DR S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions - DR G1-3 – Prevention and detection of corruption and bribery
e) Tracking the effectiveness of these efforts and communicating	ESRS 2 MDR-M ESRS 2 MDR-T Thematic ESRS: - DR S1-17 – Incidents, complaints and severe human rights impacts - DR S2-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

1.1.2.5 DR GOV-5: Risk management and internal controls over sustainability reporting

ESRS 2-GOV-5-36 a) AR 11	*The undertaking shall disclose the following information*: ***(a) the scope, main features and components of the risk management and internal control processes and systems in relation to sustainability reporting****;*

System of Internal Control over Non-Financial Reporting (ICNFR)

As with the Internal Control over Financial Reporting System (ICFR), the ICNFR (or system of internal control over sustainability reporting) is defined as the set of processes that the company carries out to provide reasonable assurance regarding the reliability of the non-financial information it discloses to the market.

This means that CIE Automotive's ICNFR system, of implementation and establishment at CIE Automotive level, must ensure that the consolidated non-financial information that the company publicly releases at any given time remains in compliance with the applicable legislation and standards, and in particular, that this is being done by preparing the Consolidated Non-Financial and Sustainability Reporting, or any substitute document based on the current legislation. That information must present a suitable reflection of all material aspects of the Group's activities in relation to Environmental, Social, and Governance (ESG) matters, while demonstrating that specific ESG objectives are being achieved.

The above must be understood as part of CIE Automotive's voluntary commitment to ESG matters, and in relation to it, the Group's intention to provide the market with reliable elements that reasonably allow assessment and monitoring of CIE Automotive's performance in relation to a variety of ESG subjects, so that its performance can be calibrated by comparison with the performance of similar companies.

In line with the CNMV's recommendations, the Audit and Compliance Committee ("ACC") is responsible for oversight of the process for preparing and ensuring the integrity of not just the financial reporting, but also the non-financial reporting, and it has also been assigned the function of final oversight of the risk control and management systems for both financial and non-financial risks.

However, in line with those same recommendations, the ACC's role is compatible with inclusion of the Environmental, Social, and Governance Committee ("ESGC") in the model for the ICNFR system as a specialised committee, which has responsibility for reporting of the consolidated NFIS (or a substitute document if required by the current legislation), on the basis of the non-financial information it has available, while also monitoring compliance with the objectives on that subject found in the 2025 ESG Strategic Plan.

The ICNFR system is based on following fundamental **principles**, which are the same as those that apply to the ICFR system:

✓ **Control environment:**
- The company demonstrates a commitment to ethical integrity and values.
- The Board demonstrates its independence from the administration and management areas and performs oversight of the implementation and performance of the internal controls.
- The management areas involved, with approval from the Board (via the ACC and ESGC), establish the structures, lines of reporting, and authorities and responsibilities, as appropriate for achieving the objectives.
- The company demonstrates a commitment to recruiting, developing, and retaining qualified personnel, in line with the objectives.
- The company retains individuals who are committed to their internal control responsibilities in pursuit of objectives.

✓ **Risk assessment:**
- The company specifies its objectives with sufficient clarity to allow identification and assessment of the risks related to them.
- The company identifies the risks affecting compliance with the objectives throughout the entity and analyses the risks to determine how they should be managed.
- The company identifies and evaluates changes that could have a significant impact on the internal control system.

✓ **Control activities:**

- The company selects and implements control activities that contribute to reducing, to acceptable levels, the non-financial reporting risks that could affect achievement of the objectives, as well as the potential financial impact of those risks.
- The company selects and implements general control activities regarding technology, to support compliance with the objectives.
- The company implements its control activities through policies that establish expectations, with procedures used to put those policies into action.

✓ **Information and communication:**

- The company obtains or generates relevant, high-quality information, and uses it to support the functioning of its internal control system.
- The company communicates information internally regarding objectives and responsibilities, to support the functioning of its internal control system.
- The company communicates with its stakeholders regarding situations affecting the functioning of its internal control system.

✓ **Monitoring and reporting:**

- The company selects, implements, and performs ongoing and/or separate evaluations to confirm that the internal control components exist and are functioning properly.
- The company evaluates and communicates internal control deficiencies in an adequate way, to all groups responsible for taking corrective actions, including Senior Management and the Board (via the ACC and ESGC), as appropriate.

All relevant documentation related to the internal control model, including the certification process and the actual internal controls, is currently stored in the following corporate tools:

✓ SAP GRC: the corporate tool used by the Compliance Body, where all information related to the ICNFR system is stored, along with the information related to the non-financial risks and the controls used to mitigate those risks.

✓ Corporate intranet: all information related to this subject is recorded and managed using the specific module developed for the Environmental Department.

✓ Supplier portal: this platform is used to manage the information that is required for the entire supply chain, to comply with the Group's requirements and commitments on this subject.

✓ SAP ECC, S/4 HANA, Datasul and SAP BPC: the Group's main corporate financial tools, which are used to record and consolidate, respectively, the financial aspects corresponding to the non-financial areas.

The company has a specific ESG dashboard, which includes the indicators used to monitor proper functioning of the model and compliance with the non-financial objectives established in the Strategic Plan.

The people responsible for performing the controls add evidence to those tools to demonstrate that the controls were performed, and they evaluate the results obtained and classify them as either satisfactory or unsatisfactory. This allows the internal control situation to be monitored in real time, which makes it possible to act quickly whenever deficiencies are detected. Action plans are established for any deficiencies detected, to ensure that they will be remedied within a specific timeframe, which is determined based on the action plan's complexity.

ESRS 2-GOV-5-36 b)	*The undertaking shall disclose the following information:* ***b) the risk assessment approach followed, including the risk prioritisation methodology;***

CIE Automotive's Risk Control Management Policy establishes the general framework for action, as well as the procedures and responsibilities to control and manage the risks that CIE Automotive must face efficiently and effectively.

Risk identification

The risk identification process consists of searching for events (associated with internal or external factors) that could affect CIE Automotive's objectives from the Strategic Plan (a combination of business and sustainability) or the annual budgeting.

That identification includes analysis of:

- ✓ Events that could affect (create or prevent, improve or worsen, accelerate or delay) achievement of the objectives.
- ✓ The sources of risk, including those that are under the company's control and those that are not.
- ✓ The areas of the company or project where the risks could have an impact.
- ✓ The causes and potential consequences, the cumulative or domino effects, and the risk scenarios.
- ✓ The locations where the risks originate.
- ✓ Identifying those with responsibility for managing the risks.

The identification process should be performed in various sessions:

- ✓ Prior to initiation of new operations, processes, or activities.
- ✓ Periodically (at least half-yearly).
- ✓ On an ad hoc basis (whenever relevant changes are detected).

The following risk categories are defined:

- ✓ **Strategic:** risks that affect high-level objectives directly related to the Strategic Plan.
- ✓ **Operational:** risks that affect the objectives linked to effective and efficient use of resources.
- ✓ **Financial:** risks that affect the financial objectives.
- ✓ **Compliance:** risks related to infringements by Senior Management or the company's own employees of external legislation or standards, or internal rules.
- ✓ Environmental, Social, and Governance **(ESG):** these risks affect environmental, social, ethical, and corporate governance aspects, or compliance with laws or standards.

It is important to understand the **external factors**, to ensure that the objectives and concerns of the stakeholders are taken into account. The external context may include, but is not limited to:

a) The social, cultural, political, legal, financial, technological, economic, natural, and competitive environment existing at the international, national, regional, or local level.
b) The factors and trends that could have an impact on the organisation's objectives.
c) Stakeholder relations.

The **internal factors** are those that the organisation is able to influence and therefore manage the risk. The risk management process must be consistent with the organisation's culture, processes, structure, and strategy.

A list of risks is compiled as a result of the risk identification process, with the following information included:

- ✓ The risk coding (ID).
- ✓ Each risk's effect (threat or opportunity) and type (strategic, financial, operational, ESG, or compliance).
- ✓ A description or definition of the risk.
- ✓ The objective affected by the risk.

Risk assessment

Risk assessment is the process of comparing the level of risk with the established risk criteria, so that decisions can be made about how to prioritise and handle each risk.

There is a synergy between the general risks that the company considers may have an impact on achieving the objectives of the Strategic Plan and the impacts, risks and opportunities (IROs) that were identified when performing the dual materiality assessment, as those IROs are considered a fundamental part of the company's overall risk assessment.

The following table shows the relationship between some of the main general risks included in the company's Risk Map and the IROs considered in the double materiality analysis.

It should be noted that the risks included here are part of the total risk catalog used to prepare the annual Risk Map, the main result and main risks identified are detailed in datapoint *ESRS 2-GOV-5-36 c)*, and the associated IROs are detailed again in datapoint *ESRS 2-GOV-5-36 d)*.

Risk Map	ESRS	Topic	Subtopic	Sub-subtopic	Description of the IRO
✓ CIE Culture ✓ Breaches of the Professional Code of Conduct ✓ Company reputation and image ✓ Sustainable supply chain ✓ Compliance with legislation ✓ Business continuity and resilience	G1	Business conduct	Corporate culture	N/A	Promotion of a corporate culture that includes respect for human rights as a pillar through awareness-raising and training of professionals.
	G1	Business conduct	Corruption and bribery	Prevention and detection	Existence of cases of corruption, fraud, bribery and money laundering, among other illicit practices.
	G1	Business conduct	Corruption and bribery	Prevention and detection	Ineffectiveness of the Whistleblowing Channel for detecting and punishing illicit practices.
	G1	Business conduct	Corruption and bribery	Prevention and detection	Breaches of the principles of the Code of Ethics and loss of trust among the company's stakeholders.
✓ Talent attraction and retention ✓ Team for growth ✓ Company reputation and image ✓ Health and safety ✓ Business continuity and resilience	S1	Own workforce	Working conditions (own workers)	Secure employment	Job and financial security for workers through stable long-term employment opportunities.
	S1	Own workforce	Equal treatment and op portunities for al (own workers)	Diversity	Integration of workers from various backgrounds and cultures due to promoting inclusive practices at all levels of the company.
	S1	Own workforce	Equal treatment and op portunities for al (own workers)	Diversity	Lack of representation of women in management and executive positions in the company.
	S1	Own workforce	Equal treatment and op portunities for al (own workers)	Training and skills development	Training policies that promote professional development and careers.
	S1	Own workforce	Other work-related rights	Child labour	Lack of protection for children due to cases of child labour in the company's plants.
	S1	Own workforce	Other work-related rights	Forced labour	Vulnerable workers, especially cross-border workers, due to modern slavery practices in the company's facilities.
✓ Company reputation and image ✓ Sustainable supply chain ✓ Health and safety ✓ Business continuity and resilience	S2	Workers in the value chain	Working conditions in the value chain	Health and safety	Reduction in the accident rate in the Value Chain thanks to the efficiency of the monitoring and controls carried out on suppliers within the framework of contracts with the company.
	S2	Workers in the value chain	Other work-related rights	Forced labour	Lack of protection of vulnerable workers, especially cross-border workers, due to modern slavery practices in suppliers' facilities.
	S2	Workers in the value chain	Other work-related rights	Child labour	Lack of protection for children due to cases of child labour in suppliers' plants.
✓ Climate change ✓ Business continuity and resilience	E1	Climate change	Climate change mitigation	N/A	Use of environmentally friendly materials such as green steel coils and recycled resins.
	E1	Climate change	Climate change adaptation	N/A	Generation of greenhouse gas emissions associated with energy-intensive material production processes. This would be the case for the production of materials such as steel coils and aluminium ingots.
	E1	Climate change	Climate change mitigation	N/A	Contributing to the decarbonisation of transport by building components for electric vehicles.
	E1	Climate change	Energy	N/A	Reducing emissions of pollutants by self-generating green energy.
	E1	Climate change	Climate change mitigation	N/A	Generation of emissions linked to the company's data centres.

Risk Map	ESRS	Topic	Subtopic	Sub-subtopic	Description of the IRO
	E1	Climate change	Climate change mitigation	N/A	Financial impacts arising from: Refusal of OEMs to take on the extra cost of production with sustainable materials.
	E1	Climate change	Climate change adaptation	N/A	Financial impacts arising from: Accompanying the company's suppliers in the adoption of environmental management systems, which facilitates traceability and control of ESG data in the upstream Value Chain.

Assessment scales were defined for probability of occurrence and impact, to create a standardised way of assessing the risks.

Risk Level (R) = Probability of Occurrence (P) x Impact (I)

The following general Probability of Occurrence (P) values are established:

	5 - Very high	4 - High	3 - Moderate	2 - Low	1 - Very Low
	> 80%	61% - 80%	31% - 60%	10% - 30%	< 10%
Past occurrence	The risk has materialised more than 5 times in the last 2 years.	The risk has materialised more than 5 times in the last 5 years.	The risk has materialised more than 5 times in the last 10 years.	The risk has materialised 1 to 4 times in the last 10 years.	The risk has not materialised, or materialised more than 10 years ago.
Future occurrence	If the risk materialises it will affect the organisation immediately (during the current financial year).	If the risk materialises it will affect the organisation within one year (the following financial year).	If the risk materialises it will affect the organisation within the next two years.	If the risk materialises it will affect the organisation within the next five years.	If the risk materialises it will only affect the organisation after more than five years.

Probability of occurrence for climate change risks:

	5 - Very high	4 - High	3 - Moderate	2 - Low	1 - Very Low
	> 80%	61% - 80%	31% - 60%	10% - 30%	< 10%
Future occurrence	If the risk materialises it will affect the organisation soon (within the next three years).	If the risk materialises it will affect the organisation before the year 2030.	If the risk materialises it will affect the organisation between the years 2030 and 2040.	If the risk materialises it will affect the organisation within 20 years after the year 2040.	If the risk materialises it will not affect the organisation until after the year 2050.

The (P) value must be based on the best possible estimate, using the information available.

The Impact (I) values are established in relation to three categories: financial, organisational, and reputational. These scales are used to position each risk on the Risk Map, which is the primary risk assessment tool.

5 - Very high	4 - High	3 - Moderate	2 - Low	1 - Very Low
EBITDA would decrease very sharply. Generates a negative impact on the P&L of more than 5%.	EBITDA would decrease sharply. Generates a negative impact on the P&L of more than 3.5%, up to 5%.	EBITDA forecasts would decrease significantly. Generates a negative impact on the P&L of more than 1.5%, up to 3.5%.	EBITDA forecasts would decrease slightly. Generates a negative impact on the P&L of more than 0%, up to 1.5%.	The current EBITDA level would be maintained.
Organisational impact				
If the risk materialises the Board would have to become involved.	If the risk materialises the CEO would have to become involved.	If the risk materialises it could be resolved at the corporate level.	If the risk materialises it could be resolved at the level of each division.	If the risk materialises it could be resolved at the level of each facility.
Reputational impact				
Loss of reputation by various activities that have a severe effect on the image and share price.	Loss of reputation by various activities that have an effect on the image and share price.	Occurrence of an event that is reported in major media sources and becomes known to the regulator/analysts.	Occurrence of an event that is reported in local media sources.	No impact.

[1] *Operating Account*

The event will generate either a negative risk (threat) or positive risk (opportunity), depending on whether its impact on the Group is negative or positive.

Also, when the risks are being assessed based on their type, the speed of occurrence may also be considered, which is defined as the amount of time that passes from materialisation of the risk until that risk directly or indirectly affects CIE Automotive's objectives.

The Compliance Body is responsible for the risk assessment process, and it must assess the risks identified within the time periods established.

Once the risk assessments are completed, they must be consolidated to produce the Risk Map, where the risk levels are represented as a table of probabilities of occurrence and impacts, using the following risk criteria:

Risk Level	Risk decision[1]
High or Very High	The assessed risk (threat/opportunity) is considered unacceptable. It must be actively handled and controls must be established.
Moderate	The assessed risk (threat/opportunity) is considered potentially unacceptable. That way it must be handled depends on the context, but controls must be established.
Low or Very Low	The assessed risk (threat/opportunity) is considered acceptable. That way it must be handled depends on the context, but controls do not have to be established.

[1] *The Compliance Body has final decision-making authority regarding the need to handle a risk or establish controls for it.*

The Compliance Body performs consolidation of the risks, taking into account the specific weights of the assessments performed by each of the persons responsible and each geographic area, for each type of risk. This results in a global vision for CIE Automotive and allows the risks to be prioritised.

ESRS 2-GOV-5-36 c)	*The undertaking shall disclose the following information* ***(c) the main risks identified and their mitigation strategies including related controls***

The result of the 2025 Risk Map shows that the main risks that may affect the organisation in achieving the strategic, operational, financial, compliance and sustainability objectives of its budget for 2026 and subsequent years, are as follows:

	Main risks 2025	**vs 2024**
1	Geopolitical risk	▲ 1
2	Change in market trends	▼ 1
3	Cybersecurity and data privacy	-
4	Team for growth	▲ 2
5	Talent attraction and retention	-
6	Management of M&A-led growth	▲ 5
7	Sustainable supply chain	▼ 3

Risks are supervised and managed by using the Risk Management and Process Control modules of the SAP GRC tool, which operates globally at all production sites, regardless of whether or not they have an ERP (Enterprise Resource Planning) system in the SAP environment.

For each risk, specific controls are established, many of which are automatic, and they are assigned to the various employees in charge of them and, in the event of incidents, action plans are established with traceability over time. In total, the Compliance department supervises compliance with more than 250 controls, applicable to each production plant, business division or corporate office, under its Internal Control Over Financial Reporting system (ICFR) and its Internal Control Over Non-Financial Reporting (ICNFR) system, which also includes ESG, criminal and regulatory compliance, IT and data protection controls under the GDPR.

The results are reviewed in the Internal Audit Department's Annual Audit Plan and must be reviewed and approved by Senior Management. All the internal audit work is managed through the SAP GRC Audit Management module, which is operational for the various local internal audit departments in Brazil, Mexico, India, China and Europe. As risk management, controls and internal audit are integrated into the same control tool (SAP GRC), the synergy obtained makes the work more efficient and provides greater value to the business divisions by letting them share their experiences and success stories.

ESRS 2-GOV-5-36 d)	*The undertaking shall disclose the following information:* ***(d) a description of how the undertaking integrates the findings of its risk assessment and internal controls as regards the sustainability reporting process into relevant internal functions and processes;***

Integration into the process map

ESG criteria are fully integrated into all of CIE Automotive's activities and decisions. In the group's Process Map, climate change occupies a central position and, in addition, and it also includes fundamental elements of CIE's culture.

In 2025, the company continued to make progress on various ESG aspects, in addition to meeting the 79 specific KPIs set out in the 2025 ESG Strategic Plan.

An important milestone was the effort to adapt the company to the requirements of the European Union's Corporate Sustainability Reporting Directive (CSRD), a directive proposed by the European Commission that seeks to improve sustainability reporting by companies. To this end, a major project was carried out in 2024 to perform the required double materiality analysis, the results of which remain valid for 2025. When the analysis was complete, the results were thoroughly checked with the various areas of the organisation. This cross-checking process was essential to ensure that the results obtained accurately and realistically reflect the perspectives of stakeholders related to the various areas, and the company's management capacity and influence in relation to the issues identified as material. Each area reviewed the information in detail that will be reported in relation to the material issues previously identified. Doing this made it possible to identify and correct any discrepancies between the material issues and the relevance of the various disclosure requirements and indicators linked to each topic.

The following table shows the relationship between the main general risks resulting from the company's 2025 Risk Map process and the IROs considered in the double materiality analysis:

Main risks 2025 Risk Map	ESRS	Topic	Subtopic	Sub-subtopic	Description of the IRO
✓ Talent attraction and retention ✓ Team for growth	S1	Own workforce	Working conditions (own workers)	Secure employment	Job and financial security for workers through stable long-term employment opportunities.
	S1	Own workforce	Equal treatment and op portunities for al (own workers)	Diversity	Integration of workers from various backgrounds and cultures due to promoting inclusive practices at all levels of the company.
	S1	Own workforce	Equal treatment and op portunities for al (own workers)	Diversity	Lack of representation of women in management and executive positions in the company.
	S1	Own workforce	Equal treatment and op portunities for al (own workers)	Training and skills development	Training policies that promote professional development and careers.
	S1	Own workforce	Other work-related rights	Child labour	Lack of protection for children due to cases of child labour in the company's plants.
	S1	Own workforce	Other work-related rights	Forced labour	Vulnerable workers, especially cross-border workers, due to modern slavery practices in the company's facilities.
✓ Sustainable supply chain	S2	Workers in the value chain	Working conditions in the value chain	Health and safety	Reduction in the accident rate in the Value Chain thanks to the efficiency of the monitoring and controls carried out on suppliers within the framework of contracts with the company.
	S2	Workers in the value chain	Other work-related rights	Forced labour	Lack of protection of vulnerable workers, especially cross-border workers, due to modern slavery practices in suppliers' facilities.
	S2	Workers in the value chain	Other work-related rights	Child labour	Lack of protection for children due to cases of child labour in suppliers' plants.

ESRS 2-GOV-5-36 e)	*The undertaking shall disclose the following information:* ***(e) a description of the periodic reporting of the findings referred to in point (d) to the administrative, management and supervisory bodies.***

A general Risk Map is drawn up annually, with around 300 employees participating in 2025. All those involved responded by considering the scope of each risk within the 2026-2030 time frame, except in the case of climate risk, which has a 2050 time frame, and for its geographical and technological scope, meaning that some people may assess a risk for more than one region and more than one technology.

This process is coordinated by the Compliance Body, which annually submits the result to the Audit and Compliance Committee for supervision and approval and subsequently reports to the Board. In addition, this Risk Map is also presented to the ESG Committee for its information.

1.1.3 Strategy

1.1.3.1 DR SBM–1: Strategy, business model and value chain

ESRS 2-- SBM-1-40 a) i	*The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters: (a) a description of:* ***i. significant groups of products and/or services offered, including changes in the reporting period (new/removed products and/or services);***

CIE Automotive produces over 7,000 parts and sub-assemblies developed using seven different core processes or technologies: aluminium injection moulding, forging, tube stamping and forming, machining, plastic injection moulding, cast iron and roof systems.

Its mastery of various technologies positions the group provides its customers one-stop shopping. They can opt for different technical proposals for the same part or choose a sub-assembly manufactured using a wide range of technologies.

The Group's technological versatility not only provides its customers various options but also allows it to direct its investments toward the technologies most in demand in the market in each situation. At present, the predominant market focus is on electric and hybrid electric vehicles. Over 80% of the components and sub-assemblies CIE Automotive builds can be adapted to these types of vehicles.

This helps prioritise sustainability issues such as: carbon emissions reduction (e.g., through parts adapted for electric vehicles); resource efficiency (e.g., more sustainable processes in injection moulding or machining); circular economy (e.g., initiatives to recycle and reuse materials in production); social innovation (e.g., creating jobs in key sectors for the energy transition).

ESRS 2-- SBM-1-40 a) ii	*The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters: (a) a description of:* ***ii. significant markets and/or customer groups served, including changes in the reporting period (new/removed markets and/or customer groups);***

CIE Automotive supports its more than 80 customers transform mobility with a range of more than 7,000 parts and sub-assemblies, manufactured at over 100 production plants of the countries in which it operates, which are adapted to their demanding quality, efficiency and sustainability needs and to the trends in the automotive sector: electrification, comfort and safety.

The company works closely with OEMs and tier-1 suppliers to optimise designs and overcome the technological and economic challenges associated with sustainable mobility. It thus offers them various technological alternatives for manufacturing the same part or sub-assembly, providing "one-stop shopping" for automotive platforms.

This proactive approach demonstrates CIE Automotive's commitment to innovation and its readiness to play a key role in the field of sustainable transport.

The company is technologically prepared to play a significant role in the transition towards electric vehicles. This is reflected in the fact that over 80% of its extensive portfolio is adaptable to various types of vehicles, including those with electric and hybrid propulsion.

In recent years, the company has consolidated its presence in the electric vehicle segment, especially in crucial areas such as batteries, motors and electronics. This strategic positioning responds to the forecast increase in market demand, in line with the guidelines of the 2025 Strategic Plan.

ESRS 2-- SBM-1-40 a) iii	*The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters: (a) a description of:* ***iii. headcount of employees by geographical areas.***

Based on ESRS 2 Appendix C - Disclosure/Application Requirements in topical ESRS that are applicable jointly with ESRS 2, the information on the number of employees by geographical areas is included in this report in section *3.1.3.2 DR S1-6 - Characteristics of the undertaking's employees.*

ESRS 2- - SBM-1- 40 a) iv	*The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters: (a) a description of:* ***iv. where applicable and material, products and services that are banned in certain markets;***

CIE Automotive confirms that in 2025, the number of products and services banned in certain markets was zero.

ESRS 2- - SBM-1- 40 b) AR 12 and 13	*The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters:* ***(b) a breakdown of total revenue, as included in its financial statements, by significant ESRS sectors. When the undertaking provides segment reporting as required by IFRS 8 Operating segments in its financial statements, this sector revenue information shall be, as far as possible, reconciled with IFRS 8 information;***

As indicated in Appendix C of ESRS 1, the disclosure of this requirement may be omitted until significant sectors of the ESRS are published.

ESRS 2- - SBM-1- 40 c) AR 12 and 13	*The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters:* ***(c) a list of the additional significant ESRS sectors beyond the ones reflected under paragraph 40(b), such as activities that give rise to intercompany revenues, in which the undertaking develops significant activities, or in which it is or may be connected to material impacts. The identification of these additional ESRS sectors shall be consistent with the way they have been considered by the undertaking when performing its materiality assessment and with the way it discloses material sector-specific information;***

CIE Automotive does not have a list of the additional significant ESRS sectors beyond the ones reflected under paragraph 40(b), such as activities that give rise to intercompany revenues, in which the undertaking develops significant activities, or in which it is or may be connected to material impacts.

ESRS 2- - SBM-1- 40 e)	*The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters:* ***(e) its sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders***

CIE Automotive continues to take firm steps in its commitment to corporate responsibility and sustainability, as evidenced by its 2025 ESG Strategic Plan, a plan primarily motivated by the preferences, needs and requirements of all its stakeholders.

Based on four strategic lines (CIE culture, ethical commitment, eco-efficiency and active listening), this 2025 ESG Strategic Plan undoubtedly marks a turning point in CIE Automotive's growing public commitment to sustainability, taking into account, on the one hand, its full integration into the company's day-to-day operations, on the other, total transparency in communicating it to the market.

The 2025 ESG Strategic Plan marks a milestone in CIE Automotive's history by establishing global commitments for the first time in the Environmental, Social and Governance (ESG) areas, which each plant must contribute to under the impetus and supervision of the horizontal corporate areas. These objectives apply globally to all the company's products and customers and to its entire value chain, regardless of where they are located.

To define and assess its progress toward these qualitative objectives, CIE Automotive uses 79 specific indicators with specific targets and deadlines. These indicators are integrated into the management plans of all the plants, which report their performance to the areas on a quarterly, half-yearly or annual basis, according to the established periodicity.

All the information is consolidated in a global ESG scorecard, kept on the group's corporate intranet, and its evolution is reported to the ESG Committee and the CEO, who makes the Horizontal ESG Committee responsible for monitoring each indicator. The indicators are subject to periodic reviews aligned with the latest analyses of the context, which considers, among other aspects, new trends in the automotive industry, stakeholder demands and the legislation in force. These objectives and the work of the corporate areas that carry them out are organised along four strategic lines: CIE culture, ethical commitment, eco-efficiency and active listening.

Compliance with the indicators under the 2025 ESG Strategic Plan, by area

Environment

Sustainable Development Goal	Indicator	Objective	Year of compliance
- 9 Industry, innovation and infrastructure - 12 Responsible consumption and production - 13 Climate action	Reduction in energy consumption (kWh/value added)	2% annual average	2025
- 9 Industry, innovation and infrastructure - 12 Responsible consumption and production - 13 Climate action	Emission intensity reduction (TCO2e/value added)	2% annual average	2025
- 9 Industry, innovation and infrastructure - 12 Responsible consumption and production - 13 Climate action	Reduction of indirect GHG emissions from power generation (Scope 2) (TCO2e)	5% annual average	2025
- 9 Industry, innovation and infrastructure - 12 Responsible consumption and production - 13 Climate action	Emission intensity reduction (TCO2e/value added)	3% annual average	2025

Supply chain

Sustainable Development Goal	Indicator	Objective	Year of compliance
- 8 Decent work and economic growth - 10 Reduce inequalities	No. of countries with ESG criteria in their procurement processes / Total number of countries in which the group operates	100%	2021
- 8 Decent work and economic growth - 10 Reduce inequalities	% local suppliers / All suppliers, out of total expenditure for the period	>70%	2023
- 8 Decent work and economic growth - 10 Reduce inequalities - 13 Climate action	No. of suppliers with annual purchasing volume > EUR 1M audited and/or self-assessed for ESG criteria in the period	25%	2022

Human Resources

Sustainable Development Goal	Indicator	Objective	Year of compliance
- 5 Gender equality - 10 Reduce inequalities	No. of plants with diversity assessment / Total number of plants in the group	100%	2025
- 3 Health and wellness - 8 Decent work and economic growth	No. of plants with ISO 45001 certification / Total number of plants in the group	100%	2025
- 3 Health and wellness - 8 Decent work and economic growth	No. of employees trained / Total no. of employees to be trained in ESG	100%	2025

Compliance

Sustainable Development Goal	Indicator	Objective	Year of compliance
- 3 Health and Wellness - 8 Decent work and economic growth	Employees trained in the Professional Code of Conduct	>95%	2021
- 3 Health and Wellness - 8 Decent work and economic growth	Holding ESG workshops	100%	2025
- 4 Quality education - 8 Decent work and economic growth	Global implementation of the compliance model	100%	2025

Sales

Sustainable Development Goal	Indicator	Objective	Year of compliance
- 17 Partnerships for the goals	No. of plants self-assessed in NQC with scores above 80%	75%	2021
- 17 Partnerships for the goals	Compile which platforms each plant uses with its customers for ESG self-assessment	100%	2021
- 17 Partnerships for the goals	No. of sales representatives trained / Total no. of sales representatives	80%	2021

Engineering

Sustainable Development Goal	Indicator	Objective	Year of compliance
- 9 Industry, innovation and infrastructure - 12 Responsible consumption and production - 13 Climate action	No. of production lines with Industry 4.0 technology initiatives implemented, by division or technology	Europe: 3 Asia: 1 Americas: 1	2024
- 9 Industry, innovation and infrastructure - 12 Responsible consumption and production - 13 Climate action	Introduction of circular economy projects to improve energy consumption (No.)	Develop a circular economy project in Europe and extend it to another region	2024
-9 Industry, innovation and infrastructure - 12 Responsible consumption and production - 13 Climate action	% improvement in ratio of gross weight to net weight	Europe: 3% improvement in 2 relevant products in 3 technologies Rest of the world: 3% improvement in 3 relevant products in 3 technologies	2025

Corporate Development

Sustainable Development Goal	Indicator	Objective	Year of compliance
- 3 Health and wellness - 8 Decent work and economic growth	New hires with the ESG Manual implemented / Total new hires	100%	2021

Financial

Sustainable Development Goal	Indicator	Objective	Year of compliance
- 8 Decent work and economic growth	Compliance with the requirements of the first sustainable financing throughout the life of the financing (%)	100%	2021
- 8 Decent work and economic growth	ESG financing agreements published (%)	100%	2023
- 8 Decent work and economic growth	Gross sustainable financing debt / Gross debt of the group	>50%	2025

Investor relations

Sustainable Development Goal	Indicator	Objective	Year of compliance
- 8 Decent work and economic growth	No. of key ESG analysts who responded/ Total number of key ESG analysts who have contacted CIE Automotive	100%	2021
- 8 Decent work and economic growth	Publication of the ESG Plan on the corporate website and on the intranet	100%	2021

ESRS 2-- SBM-1-40 f)	*The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters:* ***(f) an assessment of its current significant products and/or services, and significant markets and customer groups, in relation to its sustainability-related goals***

CIE Automotive produces over 7,000 parts and sub-assemblies developed using seven different core processes or technologies: aluminium injection moulding, forging, tube stamping and forming, machining, plastic injection moulding, cast iron and roof systems.

Its mastery of various technologies positions the group provides its customers one-stop shopping. They can opt for different technical proposals for the same part or choose a sub-assembly manufactured using a wide range of technologies.

The Group's technological versatility not only provides its customers various options but also allows it to direct its investments toward the technologies most in demand in the market in each situation. At present, the predominant market focus is on electric and hybrid electric vehicles. Over 80% of the components and sub-assemblies CIE Automotive builds can be adapted to these types of vehicles.

This helps prioritise sustainability issues such as, carbon emissions reduction (e.g., through parts adapted for electric vehicles); resource efficiency (e.g., more sustainable processes in injection moulding or machining); circular economy (e.g., initiatives to recycle and reuse materials in production); social innovation (e.g., creating jobs in key sectors for the energy transition).

One of the main markets in which CIE Automotive operates is Europe, a region where both legislation and customers are aligned with sustainability priorities. This makes it necessary to manufacture products that are in line with sustainability objectives.

In addition, the company's main customers are leading electric and hybrid vehicle manufacturers, which demand innovative and sustainable solutions and can lead CIE Automotive to invest in technologies that promote energy efficiency and emissions reduction throughout the value chain.

ESRS 2-- SBM-1-40 g)	*The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect sustainability matters:* ***(g) the elements of the undertaking's strategy that relate to or impact sustainability matters, including the main challenges ahead, critical solutions or projects to be put in place, when relevant for sustainability reporting.***

CIE Automotive constantly monitors market developments to detect risks and opportunities in sustainability issues that could condition its business in the future. This constant scrutiny enables it to mitigate key market risks and leverage its competitive advantages.

One of the main challenges and opportunities are the major investments required for electric vehicles. The transition to electric mobility is forcing the company's customers to make significant investments to innovate in battery technologies, vehicle range and electric propulsion systems. In addition, these manufacturers must design specific vehicle platforms, which requires considerable investments in engineering and design. Automotive suppliers can tackle this challenge with different strategies and lines of work. In the case of CIE Automotive, its commitment to manufacturing technologies using generalist assets, flexibility, and geographical and commercial diversification make its resilience stand out in the sector.

Parts manufacturers are playing a crucial role in the transformation of the automotive sector by helping OEMs (the customers) meet the latest trends demanded by society. These trends are giving rise to new forms of mobility and are leading to changes in manufacturing models. Studying these trends is a crucial aspect of how CIE Automotive manages market risks.

To contain climate change, the automotive industry is investing heavily in R&D&I to achieve the decarbonisation of transport. Despite these efforts, the penetration of electric vehicles is very different in each automotive market, and vehicles powered by various energy sources may coexist with each other in future.

Despite these negative factors, analysts are already starting to talk about a new cycle in the automotive industry, taking into account, among others, the following factors:

- Public interest in the new electric vehicles: Growing environmental awareness and legislation that prevent the most polluting vehicles from entering cities are driving consumers' interest in electric vehicles. As prices come down, charging points multiply and range increases, the share of electric vehicles will rise.

- Government subsidies for the transition to electric cars: Governments are implementing incentive programmes to encourage people to trade in their old vehicles for more efficient, environmentally friendly models. This is creating opportunities for manufacturers who align themselves with sustainability and efficiency initiatives. It is worth noting that three quarters of EU countries offer incentives for purchasing electric cars.

In these changing situations, the flexibility and freedom of decision offered by the CIE Automotive model is particularly relevant.

ESRS 2- - SBM-1-41	*If the undertaking is based in an EU Member State that allows for an exemption from the disclosure of the information referred to in Article 18, paragraph 1, sub-point (a) of Directive 2013/34/EU, and if the undertaking has made use of that exemption, it may omit the breakdown of revenue by significant ESRS sector required by paragraph 40(b). In this case the undertaking shall nevertheless disclose the list of ESRS sectors that are significant for the undertaking.*

CIE Automotive is not based in an EU Member State with a cut-out for the disclosure requirement under Article 18(1)(a) of Directive 2013/34/EU.

ESRS 2- - SBM-1- 42 a) AR 14	*The undertaking shall disclose a description of its business model and value chain, including:* ***(a) its inputs and its approach to gathering, developing and securing those inputs;***

To meet the challenges of the automotive sector and help it progress towards sustainability, CIE Automotive has a business model that has proven to be effective for over 25 years. This approach is underpinned by commercial, technological and geographical diversification, investment discipline and decentralised decision-making. In recent years, the model was enhanced by integrating Environmental, Social and Governance (ESG) aspects into it.

While the model is resilient in the face of sustainability challenges, there are three pillars of the model to highlight:

Multi-technology

CIE Automotive produces over 7,000 parts and sub-assemblies developed using seven different core processes or technologies: aluminium injection moulding, forging, tube stamping and forming, machining, plastic injection moulding, cast iron and roof systems.

Its mastery of various technologies positions the group provides its customers one-stop shopping. They can opt for different technical proposals for the same part or choose a sub-assembly manufactured using a wide range of technologies.

The group's technological versatility not only provides its customers various options but also allows it to direct its investments toward the technologies most in demand in the market in each situation. At present, the predominant market focus is on electric and hybrid electric vehicles.

Over 80% of the components and sub-assemblies CIE Automotive builds can be adapted to these types of vehicles.

Customer diversification

CIE Automotive has strategic business relationships with more than 80 customers worldwide, including the world's leading multinational automotive manufacturers (75%) and Tier-1 parts users (25%).

Its sales policy is based on not being overly reliant on a small number of customers. This strategic approach not only strengthens its position in price negotiations but has also been fundamental to its growth during periods of crisis.

Procurement management

CIE Automotive manages its procurement efficiently. The full details of how it manages this are included in section *3.2. Value Chain Workers (ESRS S2)*, discussed throughout the Consolidated Non-Financial and Sustainability Reporting. The main inputs in each technology are those the group refers to as productive or direct purchases, and are mainly: bar steel in forging technology, coiled steel in metal or stamping technology, plastic resins in plastic injection technology, ingot aluminium (mainly in aluminium injection technology), and embeddable components and glass in ceiling systems technology; and finally, forged steel components in machining technology.

The quality of raw materials and components is defined when the order is placed by the customer, representing around 66% of the group's total purchases in 2025.

These key suppliers show a degree of compliance with ESG criteria that CIE Automotive measures each year through the ESG risk matrix by purchasing families and through the ESG Supplier Portal.

The selection of sources of supply, prices, delivery terms, quality and delivery frequency of the inputs to the group's various plants are managed locally by each production unit in accordance with the customers' manufacturing schedules.

The purchasing procedures together with the corporate Sustainable Purchasing Policy, General Purchasing Conditions, Global Supply Chain Manual, ESG Commitment for Suppliers, are standardised and obligatory for both suppliers of productive or direct materials, as well as those of non-productive or indirect materials (mainly consumables, spare parts, services, energy, logistics, etc.).

The external ISO 20400 sustainable procurement certification that CIE Automotive obtained in 2022 and that is renewed annually, confirms compliance with ESG requirements in the supply chain management model and its exigency, monitoring and controls. In 2025, the external auditor has issued an excellent rating in its annual review.

Integration of ESG standards

In 2019, CIE Automotive officially incorporated Environmental, Social and Governance (ESG) standards into its business model. This step reinforced its commitment to the 10 Principles of the Global Compact and to the Sustainable Development Goals.

The integration of ESG standards extends beyond the company itself and includes its supply chain, which it assesses according to responsibility criteria. In addition, it actively participates in various business associations and forums to positively impact the business community.

ESRS 2- - SBM-1- 42 b)	*The undertaking shall disclose a description of its business model and value chain, including*: ***(b) its outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders;***

As indicated under *ESRS 2- SBM-1-42 (a) AR 14* and the response to *ESRS 2-SBM-1-40 (f)*, CIE Automotive produces over 7,000 parts and sub-assemblies developed using seven different core processes or technologies: aluminium injection moulding, forging, tube stamping and forming, machining, plastic injection moulding, cast iron and roof systems.

Its mastery of various technologies positions the group provides its customers one-stop shopping. They can opt for different technical proposals for the same part or choose a sub-assembly manufactured using a wide range of technologies.

The Group's technological versatility not only provides its customers various options, but also allows it to direct its investments toward the technologies most in demand in the market in each situation. At present, the predominant market focus is on electric and hybrid electric vehicles. Over 80% of the components and sub-assemblies CIE Automotive builds can be adapted to these types of vehicles.

This helps prioritise sustainability issues such as: carbon emissions reduction (e.g., through parts adapted for electric vehicles); resource efficiency (e.g., more sustainable processes in injection moulding or machining); circular economy (e.g., initiatives to recycle and reuse materials in production); social innovation (e.g., creating jobs in key sectors for the energy transition).

One of the main markets in which CIE Automotive operates is Europe, a region where both legislation and customers are aligned with sustainability priorities. This makes it necessary to manufacture products that are in line with sustainability objectives.

In addition, the company's main customers are leading electric and hybrid vehicle manufacturers, which demand innovative and sustainable solutions and can lead CIE Automotive to invest in technologies that promote energy efficiency and emissions reduction throughout the value chain.

There are also current and future positive impacts on other stakeholders. For example, in the communities in which CIE Automotive's production plants are located, where job creation and other indirect economic impacts are generated; in the workers in the value chain, the mere fact that the company promotes compliance with certain ESG criteria in its supply chain contributes to better working conditions for workers in its upstream value chain; and of course for its own employees, since by aligning itself with market trends in innovative technologies and electrification, CIE Automotive ensures that its employees have training and skills adapted to the latest developments, so that they do not lose competitiveness.

Lastly, in relation to shareholders and investors, irrespective of their stake in the company, all shareholders are treated equally in terms of information, participation and voting rights at the General Shareholders' Meeting, as required under the Spanish Corporate Enterprises Act [*Ley de Sociedades de Capital*].

Investor relations are governed by the criteria of transparency and accessibility, in line with the Policy on information, communication and contacts with shareholders, markets and other stakeholders. This policy sets out the general principles of action that guide the Investor Relations Department, which is responsible for providing accurate and regular information to the entire financial and sustainability community.

The Board monitors all information disclosed to the market and takes measures to safeguard the rights of shareholders and investors in the corporate interest.

Information is disseminated through various channels, especially through the Spanish Securities and Exchange Commission (CNMV), where the most relevant events are published, and the Group's corporate website, which has a specific "Shareholders and Investors" section. All the relevant news of the group are published in this section of the website, together with contact details.

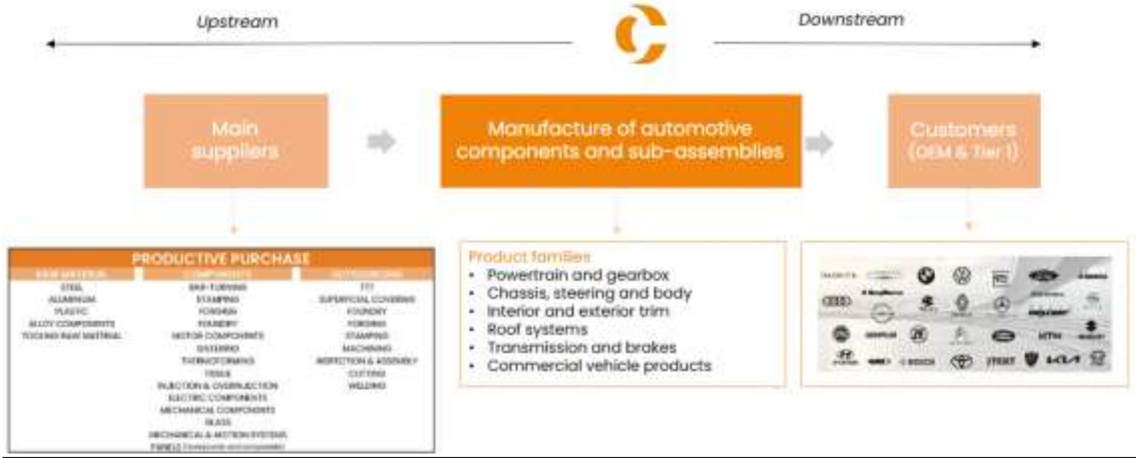
These principles will apply to the information and to the Company's relationships with the shareholders, with the markets, and with all other stakeholders, such as proxy advisors, financial intermediaries, managers and depositories of the Company's shares, financial analysts, regulatory and supervisory bodies, credit rating agencies, and reporting agencies, among others.

While still complying with the principles of equal treatment, non-discrimination, and information symmetry, the Company may adapt the information instruments, communication channels, and other the initiatives on the subject of information and communication with the shareholders and institutional and retail investors, markets, and all other shareholders on the basis of the groups that will be receiving the information.

With regard to regulatory compliance, special emphasis must be placed on the rules regarding market abuse, particularly those relating to the handling of inside information and other price-sensitive or regulated information, as contained in the applicable laws or in the Company's corporate governance rules.

ESRS 2- - SBM-1- 42 c)	*The undertaking shall disclose a description of its business model and value chain, including*: ***(c) the main features of its upstream and downstream value chain and the undertaking's position in its value chain, including a description of the main business actors (such as key suppliers, customers, distribution channels and end-users) and their relationship to the undertaking. When the undertaking has multiple value chains, the disclosure shall cover the key value chains.***

The following figure shows CIE Automotive's value chain, both upstream, considering production suppliers, including raw material suppliers, which make up the vast majority of the Group's supply chain, and downstream, including its Original Equipment Manufacturers (OEM) and Tier 1 customers.



The description of the main business actors (such as key suppliers, customers, distribution channels and end-users) and their relationship to the company are included in the Global Supply Chain Manual available on the Group's corporate website.

1.1.3.2 DR SBM-2: Interests and views of stakeholders

ESRS 2- - SBM-2- 45 a) i AR 16	*The undertaking shall disclose a summarised description of: **(a) its stakeholder engagement, including: i. the undertaking's key stakeholders***

CIE Automotive builds professional relationships based on trust, responsibility and mutual benefit with the thousands of people, organisations, groups and communities that work with it in creating its value offering. The company groups all of these stakeholders into nine main categories to homogenise its relations and drive engagement, establishing the communication channels necessary for it to understand their aspirations and recognise their contribution to the progress of all.

Shareholders	- Generate shareholder value through dividends. - Provide transparent, accurate and regular information to the investment community. - Inspire confidence in the market.
Professionals	- Offer decent employment and training in all countries - Protect the health and safety of employees - Facilitate collective bargaining. - Respect for human rights, with an emphasis on the countries most at risk.
Customers	- Commit to innovate so as to meet their demands. - Guarantee the quality and safety of products. - Continuously refine the products supplied. - Efficiently manages resources to keep prices down.
Business partners	- Strategic partnerships with Mahindra & Mahindra Ltd., in India and with Donghua Automotive Industrial, and the SAIC Group in China, allow for better understanding and adaptation to the local market.
Supply chain	- Ensure a level playing field. - Promote transparency and optimal pricing. - Apply fair payment terms. - Seek cooperation and dialogue to ensure customer satisfaction.
Society	- In its work, promote the development of the areas where it operates. - Finance social actions aimed at disadvantaged groups. - Contribute to creating safer, more comfortable and environmentally friendly cars. - The fight against climate change.
Public Administrations	- Work with local governments to improve various services. - Integrate their requirements into the company's facilities, in accordance with legality, transparency and cooperation.
Sector	- Actively participate in, and hold relevant positions in, various Spanish and European business associations.
Lenders	- Negotiate the best terms, according to investment needs and market terms.

ESRS 2- - SBM-2- 45 a) ii-v AR 16	*The undertaking shall disclose a summarised description of: **(a) its stakeholder engagement, including: ii. whether engagement with them occurs and for which categories of stakeholders; iii. How it is organised; iv. its purpose; and v. how its outcome is taken into account by the undertaking;***

The company has a wide range of information and engagement channels, the most important of which is its corporate website, where its stakeholders can consult all the company's information or access different forms of dialogue and contact.

The company remains continuously engaged with its stakeholders, as this is necessary for it to carry out its work properly, for example, from selling its products to paying the relevant taxes.

Channels of communication and engagement

Corporate Website	The corporate website www.cieautomotive.com contains relevant information about the company: in addition to information for potential employees in the "Human Resources" section, it provides access to the new Supplier Portal in the "Suppliers" section, has a "Press Room" with the company's press releases, and offers an extensive information section aimed at "Investors and Shareholders", which complies with Circular 3/2015 of the National Securities Market Commission (CNMV).
Specific contact with each stakeholder group	- ESG and Society: Susana Molinuevo - esg@cieautomotive.com - Professionals: Aitor Zazpe - hr@cieautomotive.com - Relations with investors and business partners: Lorea Aristizabal - ir@cieautomotive.com - Customers and the sector: Mikel Orbegozo - sales@cieautomotive.com - Supply chain: Irache Pardo - purchasing@cieautomotive.com - Lenders: Irache Pardo - financierocie@cieautomotive.com - Public Administration: compliance@cieautomotive.com
By post	Any stakeholder may contact the relevant department at the following postal address: *AIC - Automotive Intelligence Center.* *Parque Empresarial Boroa, Parcela 2A – 4, 48340 Amorebieta (Bizkaia), Spain.*
Whistleblowing channel	Anyone may report breaches of the guidelines of conduct set out in CIE Automotive's Professional Code of Conduct through the channel provided on the corporate website and on the corporate intranet.

Under *ESRS 2- IRO-2-59*, CIE Automotive has provided an explanation of how it has determined the material information to be disclosed related to the impacts, risks and opportunities it has assessed to be material, where the information received from its stakeholders is part of the process.

ESRS 2- - SBM-2- 45 b)	*The undertaking shall disclose a summarised description of:* ***(b) the undertaking's understanding of the interests and views of its key stakeholders as they relate to the undertaking's strategy and business model, to the extent that these were analysed during the undertaking's due diligence process and/or materiality assessment process (see Disclosure Requirement IRO-1 of this Standard);***

The results of from the company's engagement with its stakeholders were also used to identify sustainability issues in the dual materiality assessment. Although no explicit consultation with external stakeholders was carried out to understand the interests and views of the company's key stakeholders as they relate to its strategy and business model, interviews were conducted with individuals within the company (either from the Board or senior management) who have extensive knowledge of specific stakeholders, as well as an analysis of public documentation about them.

In addition, in the dual materiality process carried out in 2024, the results of which are valid for 2025, key interviews were held with the company's geographical representatives. These individuals were chosen for their specific role within the Group, as well as for their knowledge of the interests and perspectives of the various stakeholders affected.

With this approach, opinions were taken into account indirectly from the company's own professionals, customers, society, as well as from suppliers and lenders, among others.

Topic analysed	Process and scope	Documentation reviewed
Business model	Determination of the essential characteristics of the business model. Including: geographic presence, commercial diversification, multi-technology, decentralised management, ESG integration.	Internal documentation available on the corporate website: - 2023 Annual Report - Company presentation. Managing high value-added processes. - ESG Policy - 2025 ESG Strategic Plan
Products	- Mapping of the product families that make up CIE Automotive's offering, by region and technology applied in manufacturing. - Turnover by region	
Industry and sector	Study of the main trends in the automotive sector and in the autoparts sub-sector.	Sectoral reports prepared by EY: - Key trends in automotive retail - Why EY automotive - Outlook of autoparts manufacturers

Supply chain	- Understanding and scope of the automotive supply chain - Understanding of the TIER 1, TIER 2 and OEMs and CIE's positioning. - How ESG aspects are managed in the Value Chain - Purchasing model	Internal documentation available on the corporate website: - Human Rights Policy - Anti-Corruption and Fraud Policy - Code of Conduct - Environmental, Social and Corporate Governance Commitment for Suppliers - Global Supply Chain Manual

ESRS 2- - SBM-2- 45 c) i	*The undertaking shall disclose a summarised description of:* ***(c) where applicable, amendments to its strategy and/or business model, including: i. how the undertaking has amended or expects to amend its strategy and/or business model to address the interests and views of its stakeholders****;*

As shown under *ESRS 2-SBM-1-40 (e)*, CIE Automotive continues to take firm steps in its commitment to corporate responsibility and sustainability, as evidenced by its 2025 ESG Strategic Plan, a plan primarily motivated by the preferences, needs and requirements of all its stakeholders.

No amendments or adaptations were made to its strategy and/or business model in this context in 2025.

ESRS 2- - SBM-2- 45 c) ii	*The undertaking shall disclose a summarised description of:* ***(c) where applicable, amendments to its strategy and/or business model, including: ii. any further steps that are being planned and in what timeline; and***

CIE Automotive is in constant communication with its stakeholders. Once the period has expired and the objectives included in its current 2025 ESG Strategic Plan have been met, a new phase will begin, taking into account the results of the dual materiality assessment carried out in 2024, and valid for 2025, continue to include sustainability as a cornerstone of its strategy.

ESRS 2- - SBM-2- 45 c) iii	*The undertaking shall disclose a summarised description of:* ***(c) where applicable, amendments to its strategy and/or business model, including: iii. whether these steps are likely to modify the relationship with and views of stakeholders***

As shown under *ESRS 2-SBM-2-45 (c) (ii)*, CIE Automotive is in continuous communication with its stakeholders. Once the period has expired and the objectives included in its current 2025 ESG Strategic Plan have been met, a new phase will begin, taking into account the results of the double materiality analysis carried out in 2024 and valid for 2025, continue to include sustainability as a cornerstone of its strategy.

As this new plan is implemented, it will be possible to determine whether it is having any impact on the relationship with stakeholders' views, which were a key input in the dual materiality assessment.

ESRS 2- - SBM-2- 45 d)	*The undertaking shall disclose a summarised description of:* ***(d) whether and how the administrative, management and supervisory bodies are informed about the views and interests of affected stakeholders with regard to the undertaking's sustainability-related impacts.***

As shown under *ESRS 2-SBM-1-40 e)*, the information from the 2025 ESG Strategic Plan is consolidated in a global ESG scorecard, kept on the group's corporate intranet, and its evolution is reported to the ESG Committee and the CEO, who makes the Horizontal ESG Committee responsible for monitoring each indicator. The indicators are subject to periodic reviews aligned with the latest analyses of the context, which considers, among other aspects, new trends in the automotive industry, stakeholder demands and the legislation in force. These objectives and the work of the corporate areas that carry them out are organised along four strategic lines: CIE culture, ethical commitment, eco-efficiency and active listening.

Furthermore, it is worth highlighting the involvement of the ESG Committee in conducting the double materiality analysis and reviewing it in 2025.

1.1.3.3 DR SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

ESRS 2- - SBM-3- 48 a) AR 17 and 18	*The undertaking shall disclose*: ***(a) a brief description of its material impacts, risks and opportunities resulting from its materiality assessment (see Disclosure Requirement IRO-1 of this standard), including a description of where in its business model, its own operations and its upstream and downstream value chain these material impacts, risks and opportunities are concentrated;***

The information on this indicator is provided in the response to *ESRS 2-SBM-3–48 h).*

ESRS 2- - SBM-3- 48 b)	*The undertaking shall disclose*: ***(b) the current and anticipated effects of its material impacts, risks and opportunities on its business model, value chain, strategy and decision-making, and how it has responded or plans to respond to these effects, including any changes it has made or plans to make to its strategy or business model as part of its actions to address particular material impacts or risks, or to pursue particular material opportunities;***

The list of material impacts, risks and opportunities (IROs) addressed by the administrative, management and supervisory bodies or their relevant committees during the reporting period is shown in *ESRS 2-GOV-2-26 c)*. These IROs will be managed directly by Senior Management and the Management Team and will form part of the new Strategic Sustainability Plan to be developed after the current 2025 ESG Strategic Plan comes to an end in 2025.

ESRS 2- - SBM-3- 48 c) i-ii	*The undertaking shall disclose: c) with reference to the undertaking's material impacts*: ***i. how the undertaking's material negative and positive impacts affect (or, in the case of potential impacts, are likely to affect) people or the environment;*** ***ii. whether and how the impacts originate from or are connected to the undertaking's strategy and business model***

In general, the environmental, social and governance impacts, as well as those related to the material entity-specific indicators identified by CIE Automotive in its dual materiality assessment, originate from, or are related to, the company's strategy and business model. Due to its business model as a manufacturer of automotive parts, there are multiple impacts, risks and opportunities related to emissions, pollution, water consumption, circular economy, as well as those related to its own workers, workers in its value chain, customers, etc. Its strategy also has impacts, risks and opportunities associated with governance, relations with suppliers, protection of human rights both in its own operations and in its value chain, etc.

ESRS 2- - SBM-3- 48 c) iii	*The undertaking shall disclose: c) with reference to the undertaking's material impacts*: ***iii. the reasonably expected time horizons of the impacts;***

The information on this indicator is provided in the response to *ESRS 2-BP-2–9 (a).*

ESRS 2- - SBM-3- 48 c) iv	*The undertaking shall disclose: c) with reference to the undertaking's material impacts*: ***iv. whether the undertaking is involved with the material impacts through its activities or because of its business relationships, describing the nature of the activities or business relationships concerned;***

Most of the impacts identified in the dual materiality assessment arise from the type of activity the company performs: from the companies in its Value Chain extracting raw materials, to manufacturing parts and sub-assemblies using technologies.

In turn, the impacts derived from or linked to its Value Chain arise from its business relationships. All this information is contained in *ESRS 2-GOV-2 –26 (c).*

ESRS 2- - SBM-3- 48 d)	*The undertaking shall disclose*: ***(d) the current financial effects of the undertaking's material risks and opportunities on its financial position, financial performance and cash flows and the material risks and opportunities for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements;***

The material risks and opportunities identified in the dual materiality assessment are included in the table in the response to *ESRS 2- SBM-3- 48 (h)*, included below in this section.

The financial effects related to these risks and opportunities are related to economic impacts on the company's EBITDA. The event will generate either a negative risk (threat) or positive risk (opportunity), depending on whether its impact on the Group is negative or positive. Reputational impacts, which could incur financial effects, have also been taken into account. However, it should be noted that the estimate is based on a preliminary analysis and that the company is working on developing more robust methodologies.

Based on the work performed during the dual materiality assessment and taking into account the time horizons considered, the company does not consider that there will be a material risk of a materiality adjustment to the carrying amounts of the assets and liabilities disclosed in the relevant financial statements for the identified impacts, risks and opportunities in the next annual reporting period.

ESRS 2- - SBM-3- 48 e)	*The undertaking shall disclose*: ***(e) the anticipated financial effects of the undertaking's material risks and opportunities on its financial position, financial performance and cash flows over the short-, medium- and long-term, including the reasonably expected time horizons for those effects. This shall include how the undertaking expects its financial position, financial performance and cash flows to change over the short, medium- and long-term, given its strategy to manage risks and opportunities, taking into consideration: i. its investment and disposal plans (for example, capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas and asset retirements), including plans the undertaking is not contractually committed to; and ii. its planned sources of funding to implement its strategy.***

CIE Automotive assessed the possibility of gathering information on the expected financial effects of the company's material risks and opportunities on its financial position, financial performance and cash flows in the short, medium and long term, including the reasonably expected time horizons for those impacts, applying an approach based on the principle of reasonable effort, which takes into account both the impact and the availability of resources, ensuring an appropriate balance between the quality of the information reported and the feasibility of the data gathering effort.

In this second year of the Directive being applicable, no information will be reported on the anticipated financial effects of the undertaking's material risks and opportunities on its financial position, financial performance and cash flows over the short-, medium- and long-term, including the reasonably expected time horizons for those effects, due to the application of Delegated Regulation 2025/1416 ('quick fix') published in the OJEU on 10 November 2025, which amends the delegated regulation adopting the ESRS, in particular for first-phase companies, freezing and delaying the application of the transitional provisions by two years.

ESRS 2- - SBM-3- 48 f)	*The undertaking shall disclose*: ***(f) information about the resilience of the undertaking's strategy and business model regarding its capacity to address its material impacts and risks and to take advantage of its material opportunities. The undertaking shall disclose a qualitative and, when applicable, a quantitative analysis of the resilience, including how the analysis was conducted and the time horizons that were applied as defined in ESRS 1 (see ESRS 1 chapter 6. Time horizons). When providing quantitative information, the undertaking may disclose single amounts or ranges;***

To address the material impacts and risks and take advantage of the material opportunities identified in the dual materiality assessment (IROs), CIE Automotive has a resilient strategy and business model. The thematic chapters include management measures throughout them to address the material impacts, risks and opportunities related to environmental, social and governance issues.

Identifying material IROs validates and strengthens the resilience of the strategy by aligning it with the most relevant sustainability issues, with a commitment to strengthening this alignment in the next version of the Strategic Plan. This would help strengthen the resilience of the business model, enhancing CIE Automotive's ability to address the challenges arising from its business and maximise the opportunities identified.

These actions include:

- In environmental matters, actions and targets for reducing emissions, measures to optimise the use of resources, etc. Specifically, the information is included under *ESRS E1 Climate change.*
- In social matters: actions to promote professional development through training programmes, evaluation of suppliers according to social standards, etc.
- In the area of Governance: integration of good corporate governance practices, ensuring transparency and regulatory compliance.

ESRS 2- - SBM-3- 48 g)	*The undertaking shall disclose:* ***g) changes in incidents, risks and opportunities of relative importance compared to the previous reporting period.***

All information relating to this indicator is provided below in section *1.1.4.1.2. RD IRO-2: Disclosure requirements established in the ESRS covered by the company's Sustainability Statement*, data point *ESRS 2-IRO-2-59*.

ESRS 2- - SBM-3- 48 h)	*The undertaking shall disclose:* ***(h) a specification of those impacts, risks and opportunities that are covered by ESRS Disclosure Requirements as opposed to those covered by the undertaking using additional entity-specific disclosure.***

Impacts, Risks and Opportunities (IROs)

+: positive impact // -: negative impact // R: risk // O: opportunity

Topic / Sub-topic	Point in the Value Chain	Time horizon	IROs
ESRS - E1 Climate change Climate change adaptation	Upstream Upstream	Short term	(-) Generation of greenhouse gas emissions associated with energy-intensive material production processes. This would be the case for the production of materials such as steel coils and aluminium ingots. (O) Financial impacts arising from: Accompanying the company's suppliers in the adoption of environmental management systems, which facilitates traceability and control of ESG data in the upstream Value Chain.
Climate change mitigation	Company Company Upstream Downstream	Short term Long term Medium term	(+) Use of environmentally friendly materials, such as green steel coils or recycled resins. (+ and O) Contribution to the decarbonisation of transport through the manufacture of components for electric vehicles. (R) Financial effects derived from: Generation of emissions linked to the company's data centres.
Energy	Company	Short-/ medium-term	(+ and O) Reducing emissions of pollutants by self-generating green energy.
ESRS – E2 Pollution Air pollution	Upstream Company Company	Short term Medium term Medium term	(-) Air pollution associated with generation of Scope 3 emissions. (- and R) Increase in the company's environmental footprint due to selling parts manufactured in other geographic locations to meet the requirements of certain customers. (+ and O) Reduction of Scope 1 and 2 emissions due to the use of renewable energy and self-generation of energy to supply the company's facilities.
Water pollution	Company Company Company	Medium term	(+) Reduced potable water consumption due to increased use of recycled water. (R) Financial impacts arising from: Increased eutrophication of water due to discharges from non-recycled water. (R) Financial impacts arising from: Increased ecotoxicity of freshwater due to non-recycled waste in production processes.
Pollution of soil	Upstream	Medium term	(R) Financial impacts arising from: Soil contamination through chemical soil erosion during the extraction of raw materials.
ESRS - E3 Water and marine resources Water	Company Company	Medium term	(R) Financial impacts arising from: Decrease in the volume and quality of water sources near the plants due to the intensive use of this resource, especially in industrial processes that require processing materials at high temperatures. (R) Financial impacts arising from: Increased water consumption due to increased production of products linked to water-intensive technologies.

Topic / Sub-topic	Point in the Value Chain	Time horizon	IROs
ESRS - E5 **Resource use and circular economy** Resource inputs, including resource use	Company Company Company Company Company	Short term Medium term Short term Medium term Short term	(+) Use of recycled materials in production processes involving aluminium. (+) Use of returnable packaging that can be used for other products, thus reducing waste and extending the packages' life cycle. (+) Internal reuse of returns from the company's various production processes through its own recycling system. (+) Reduction in the volume of materials used in production processes due to a reduction in the gross weight of the products manufactured by the company. (O) Financial impacts arising from: Internal reuse of returns from the company's various production processes through its own recycling system.
Resource outflows related to products and services	Company Company Company	Short term	(+) Development of products under eco-design criteria and with a life cycle approach that improves their reparability, disassembly and separation, and thus increases their recyclability. (+) Recirculation of water from high-temperature material processing through internal water treatment systems and facilities. (O) Financial impacts arising from: Development of products under eco-design criteria and with a life cycle approach that improves their reparability, disassembly and separation, and thus increases their recyclability.
Waste	Upstream Company Company	Long term	(R) Financial impacts arising from: Generation of toxic waste during the process of extracting raw materials. (R) Financial impacts arising from: Generation of waste associated with the use of technical plastics. (O) Financial impacts arising from: Sale of non-recyclable steel waste to local suppliers for reuse.
ESRS - S1 **Own workforce** Working conditions (own workers)	Company Company Company Company Company	Short term	(+) Job and financial security for workers through stable long-term employment opportunities. (R) Job losses and reduced value generation due to downsizing in company plants. (O) Work-life balance due to working conditions including flexible working hours and measures to combat excessive working hours. (R) Fatalities due to accidents during working hours. (R) Financial effects arising from: Increased job insecurity as a result of outsourcing operations to the so-called BRIC countries.
Equal treatment and oppo rtunities for all	Company Company Company	Short/medium term	(+) Training policies that promote professional development and careers. (-) Cases of violence or harassment due to discrimination (racial, gender or sexual) in the company. (-) Lack of representation of women in management and executive positions in the company.
Other work-related rights	Company Company	Short term	(-) Vulnerable workers, especially cross-border workers, due to modern slavery practices in the company's facilities. (-) Lack of protection for children due to cases of child labour in the company's plants.
ESRS - S2 **Workers in the value chain** Working conditions in the value chain	Upstream Upstream	Long term	(R) Financial impacts arising from: Infringement of the right to freedom of association of workers in the Value Chain due to the company's lack of control of ethical commitments. (O) Financial impacts arising from: Reduction in the accident rate in the Value Chain thanks to the efficiency of the monitoring and controls carried out on suppliers within the framework of contracts with the company.
Equal treatment and oppo rtunities for all	Upstream Upstream	Medium/ Long term	(O) Financial impacts arising from: Increased diversity and inclusion of employees in the Value Chain due to the company's influence to improve ESG policies. (R) Financial impacts arising from: Cases of violence or harassment due to discrimination (racial, gender or sexual) on the premises of the companies in the Value Chain.
Other work-related rights	Upstream Upstream	Long term	(R) Financial impacts arising from: Lack of protection of vulnerable workers, especially cross-border workers, due to modern slavery practices in suppliers' facilities. (R) Financial impacts arising from: Lack of protection for children due to cases of child labour in suppliers' plants.

Topic / Sub-topic	Point in the Value Chain	Time horizon	IROs
ESRS – ES Customers Personal safety of users and end-consumers	Downstream Downstream	Medium/ Short term	(+) Designing more robust parts that help boost vehicle safety. (O) Financial impacts arising from: Designing more robust parts that help boost vehicle safety.
ESRS - G1 Business conduct Corporate culture	Company Company Company	Medium/ Short term	(+ and R) High security of OEM data, including information relating to part moulds and prototypes. (+) Fostering a corporate culture of high ethical standards, transparency and integrity. (+ and O) Promotion of a corporate culture that includes respect for human rights as a pillar through awareness-raising and training of professionals.
Corruption and bribery	Company Company Company	Short/Medium term	(- and R) Existence of cases of corruption, fraud, bribery and money laundering, among other illicit practices. (-) Ineffectiveness of the Whistleblowing Channel for detecting and punishing illicit practices. (- and R) Breaches of the principles of the Code of Ethics and loss of trust among the company's stakeholders.
Management of rela tionships with suppli ers, including payment practices	Company Company	Short term	(+ and O) Relations with suppliers based on objectivity, transparency and fair and non-discriminatory treatment. (+ and O) Helping suppliers develop their processes by partnering with them.
Protection of whistleblowers	Company	Medium term	(-) Economic or social duress on employees of the company or its Value Chain, placed on them by powerful figures in the company because they filed complaints.
Political participation and lobbying	Company Company	Long term	(R) Financial effects arising from: Promotion of ESG issues through participation in key automotive industry associations and clusters. (O) Collaboration with Public Administrations as a key Stakeholder Group to achieve improved services for communities.

1.1.4 Management of impacts, risks and opportunities

1.1.4.1 Information on the materiality assessment process

1.1.4.1.1 DR IRO-1: Description of the process to identify and assess material impacts, risks and opportunities

ESRS 2- - IRO-1-53 a); b); c); and g)	*The undertaking shall disclose the following information:* *(a) a description of the methodologies and assumptions applied in the described process* *(b) an overview of the process to identify, assess, prioritise and monitor the undertaking's potential and actual impacts on people and the environment, informed by the undertaking's due diligence process, including an explanation of whether and how the process:* *i. focusses on specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts;* *ii. considers the impacts with which the undertaking is involved through its own operations or as a result of its business relationships;* *iii. includes consultation with affected stakeholders to understand how they may be impacted and with external experts* *iv. prioritises negative impacts based on their relative severity and likelihood, (see ESRS 1 section 3.4 Impact materiality) and, if applicable, positive impacts on their relative scale, scope and likelihood, and determines which sustainability matters are material for reporting purposes, including the qualitative or quantitative thresholds and other criteria used as prescribed by ESRS 1 section 3.4 Impact materiality;* *(c) an overview of the process used to identify, assess, prioritise and monitor risks and opportunities that have or may have financial effects. The disclosure shall include:* *i. how the undertaking has considered the connections of its impacts and dependencies with the risks and opportunities that may arise from those impacts and dependencies;* *ii. how the undertaking assesses the likelihood, magnitude, and nature of effects of the identified risk and opportunities (such as the qualitative or quantitative thresholds and other criteria used as prescribed by ESRS 1 section 3.3 Financial materiality);* *iii. how the undertaking prioritises sustainability-related risks relative to other types of risks, including its use of risk-assessment tools;* *(g) the input parameters it uses (for example, data sources, the scope of operations covered and the detail used in assumptions).*

All the information relating to this indicator is set out below in section *1.1.4.1.2 DR IRO-2: Disclosure Requirements in ESRS covered by the undertaking's sustainability statement* indicator *ESRS 2-IRO-2-59*.

ESRS 2- - IRO-1-53 d)	*The undertaking shall disclose the following information:* *(d) a description of the decision-making process and the related internal control procedures;*

The dual materiality assessment and its results were supervised by CIE Automotive's Environmental, Social and Governance (ESG) Committee. In addition, the same information has been submitted to the company's Audit and Compliance Committee.

ESRS 2- - IRO-1-53 e) and f)	*The undertaking shall disclose the following information:* *(e) the extent to which and how the process to identify, assess and manage impacts and risks is integrated into the undertaking's overall risk management process and used to evaluate the undertaking's overall risk profile and risk management processes;* *(f) the extent to which and how the process to identify, assess and manage opportunities is integrated into the undertaking's overall management process where applicable;*

All the information relating to this indicator is set out below in section *1.1.4.1.2 DR IRO-2: Disclosure Requirements in ESRS covered by the undertaking's Consolidated Non-Financial and Sustainability Reporting* datapoint *ESRS 2-IRO-2-59*.

ESRS 2- - IRO-1-53 h)	*The undertaking shall disclose the following information:* *Whether the process has changed and how it has changed compared to the previous reporting period, when the process was last modified, and future dates for reviewing the assessment of materiality.*

All information relating to this indicator is provided below in section *1.1.4.1.2. RD IRO-2: Disclosure requirements established in the ESRS covered by the company's Sustainability Statement*, data point *ESRS 2-IRO-2-59*.

1.1.4.1.2 DR IRO-2: Disclosure Requirements in ESRS covered by the undertaking's Sustainability Statement

ESRS 2- - IRO-2-56	*The undertaking shall include a list of the Disclosure Requirements complied with in preparing the sustainability statement, following the outcome of the materiality assessment (see ESRS 1 chapter 3), including the page numbers and/or paragraphs where the related disclosures are located in the sustainability statement. This may be presented as a content index. The undertaking shall also include a table of all the datapoints that derive from other EU legislation as listed in Appendix B of this standard, indicating where they can be found in the sustainability statement and including those that the undertaking has assessed as not material, in which case the undertaking shall indicate "Not material" in the table in accordance with ESRS 1 paragraph 35.*

The list of the disclosure requirements (DR) complied with in preparing the Sustainability Statement, following the outcome of the materiality assessment (see ESRS 1 chapter 3), including the page numbers and/or paragraphs where the related disclosures are located in the Consolidated Non-Financial and Sustainability Reporting, are provided in this document's contents index.

A table of all the datapoints that derive from other EU legislation as listed in Appendix B of this standard is also included below, indicating where they can be found in the Consolidated Non-Financial and Sustainability Reporting and including those that the undertaking has assessed as not material, in which case the undertaking shall indicate "Not material" in the table in accordance with ESRS 1 paragraph 35.

List of datapoints in cross-cutting and topical standards that derive from other EU legislation:

Disclosure requirement and related datapoint	Page	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS 2 GOV-1 Gender diversity of the Board Article 21 (d)	8	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)	8			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-4 Due diligence statement paragraph 30	22	Indicator number 10 Table #3 of Annex 1			
ESRS 2 SBM-1 Participation in fossil fuel activities paragraph 40(d)(i)	n/a	Indicator number 4 Table #1 Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40(d)(ii)	n/a	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40(d)(iii)	n/a	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/181829, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40(d)(iv)	n/a			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14	64-65				Regulation (EU) 2021/1119, Article 2(1)

Disclosure requirement and related datapoint	Page	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16(g)	67		(a) of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12 (1) (d) to (g), and Article 12 (2)	
ESRS E1-4 GHG Emission Reduction Targets paragraph 34	98-99	Indicator number 4 Table #2 of Annex 1	Article 449(a) Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6	
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	100	Indicator no. 5 Table #1 and Indicator no. 5 Table #2 of Annex 1			
ESRS E1-5 Energy consumption and mix paragraph 37	99-100	Indicator number 5 Table #1 of Annex 1			
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	101	Indicator number 6 Table #1 of Annex 1			
ESRS E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions paragraph 44	101-102	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	108	Indicator number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)	
ESRS E1-7 GHG removals and carbon credits paragraph 56	n/a				Regulation (EU) 2021/1119, Article 2(1)
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66	109-110			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).	109		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5. Banking book. Exposures subject to physical risk		

Disclosure requirement and related datapoint	Page	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)	110		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2: :Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral		
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69	111			Delegated Regulation (EU) 2020/1818, Annex II	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	130	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1			
ESRS E3-1 Water and marine resources paragraph 9	n/a	Indicator number 7 Table #2 of Annex 1			
ESRS E3-1 Dedicated policy paragraph 13	136	Indicator number 8 Table #2 of Annex 1			
ESRS E3-1 Sustainable oceans and seas paragraph 14	Not material	Indicator number 12 Table #2 of Annex 1			
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	145	Indicator number 6.2 Table #2 of Annex 1			
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	145	Indicator number 6.1 Table #2 of Annex 1			
ESRS 2 - IRO 1 - E4 paragraph 16(a)(i)	Not material	Indicator number 7 Table #1 of Annex 1			
ESRS 2 - IRO 1 - E4 paragraph 16(b)	Not material	Indicator number 10 Table #2 of Annex 1			
ESRS 2 - IRO 1 - E4 paragraph 16(c)	Not material	Indicator number 14 Table #2 of Annex 1			
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24(b)	Not material	Indicator number 11 Table #2 of Annex 1			
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24(c)	Not material	Indicator number 12 Table 2 of Annex 1			
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Not material	Indicator number 15 Table #2 of Annex 1			
ESRS E5-5 Non-recycled waste paragraph 37 (d)	173	Indicator number 13 Table #2 of Annex 1			
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	n/a	Indicator number 9 Table #1 of Annex 1			
ESRS 2 - SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	177-178	Indicator number 13 Table #3 of Annex I			
ESRS 2 - SBM3 - S1 Risk	178	Indicator number 12 Table			

Disclosure requirement and related datapoint	Page	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
of incidents of child labour paragraph 14 (g)		#3 of Annex I			
ESRS S1-1 Human rights policy commitments paragraph 20	182-185	Indicator number 9 Table 3 and indicator number 11 Table 1 of Annex I			
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 21	185			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	185	Indicator number 11 Table #3 of Annex I			
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	185-186	Indicator number 1 Table #3 of Annex I			
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	194	Indicator number 5 Table #3 of Annex I			
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	218	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88(e)	219	Indicator number 3 Table #3 of Annex I			
ESRS S1-16 Unadjusted gender pay gap paragraph 97(a)	220	Indicator number 12 Table 1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-16 Excessive CEO pay ratio paragraph 97(b)	220	Indicator number 8 Table #3 of Annex I			
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	220-221	Indicator number 7 Table #3 of Annex I			
ESRS S1-17. Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 104(a)	222	Indicator number 10 Table 1 and indicator no. 14 Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	
ESRS 2 - SBM3 - S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	226	Indicators 12 and 13 Table #3 of Annex I			
ESRS S2-1 Human rights policy commitments paragraph 17	233-235	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1			
ESRS S2-1 Policies related to value chain workers, paragraph 18	236	Indicators 11 and 4 Table #3 of Annex 1			

Disclosure requirement and related datapoint	**Page**	**SFDR reference**	**Pillar 3 reference**	**Benchmark Regulation reference**	**EU Climate Law reference**
ESRS S2-1. Non respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 19	236-237	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 19	236-237			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	251	Indicator number 14 Table #3 of Annex 1			
ESRS S3-1 Human rights policy commitments paragraph 16	Not material	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1			
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines, paragraph 17	Not material	Indicator number 10 Table 1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	
ESRS S3-4 Human rights problems and incidents (36)	Not material	Indicator number 14 Table #3 of Annex 1			
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Not material	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1			
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17	Not material	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	
ESRS S4-4 Human rights issues and incidents paragraph 35	Not material	Indicator number 14 Table #3 of Annex 1			
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	n/a	Indicator number 15 Table #3 of Annex 1			
ESRS G1-1 Protection of whistle-blowers 10(d)	n/a	Indicator number 6 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS G1-4 Fines for violation of of anti-corruption and anti-bribery laws, paragraph 24 (a)	286	Indicator number 17 Table #3 of Annex 1			
ESRS G1-4 Anti-corruption and anti-bribery laws paragraph 24(b)	286-287	Indicator number 16 Table #3 of Annex 1			

ESRS 2- - IRO-2-58	*If the undertaking concludes that a topic other than climate change is not material and therefore omits all the Disclosure Requirements in the corresponding topical ESRS, it may provide a brief explanation of the conclusions of its materiality assessment for that topic.*

The topics other than climate change that were not assessed as material in the double materiality analysis carried out in 2024 and validated in 2025 and that therefore have no disclosures regarding them are: ESRS E4 Biodiversity and ecosystems, ESRS S3 Affected communities, and ESRS S4 Consumers and end-users.

The topics other than climate change that have not been identified as material in the double materiality analysis carried out in 2024 and validated in 2025, and therefore all disclosure requirements are omitted, are as follows: ESRS E4 Biodiversity and ecosystems, ESRS S3 Affected groups, and ESRS S4 Consumers and end users.

ESRS E4 and S3 are not being reported as they were assessed as being below the materiality limit.

However, ESRS S4 was initially supposed to be reported as it was assessed to be above the materiality limit, namely due to having an impact on the safety of people. However, after comparing the results of the dual materiality with internal areas of the company, both in 2024 and now in 2025, it was concluded that this standard was affecting two stakeholders: on the one hand the consumers and end-users of the parts, and on the other hand the customers who provide these parts to the consumers and end-users.

As CIE Automotive is a company that exchanges services, information and/or products from one company to another, it influences its consumers and end-users through its customers, rather than directly. Therefore, after analysis, it was concluded that this is best addressed through its impact on its customers, rather than on consumers and end-users, so this section will be dealt with in an institution-specific disclosure ESRS.

ESRS 2- - IRO-2-59	*The undertaking shall provide an explanation of how it has determined the material information to be disclosed in relation to the impacts, risks and opportunities that it has assessed to be material, including the use of thresholds and/or how it has implemented the criteria in ESRS 1 section 3.2 Material matters and materiality of information. Material matters and materiality of information.*

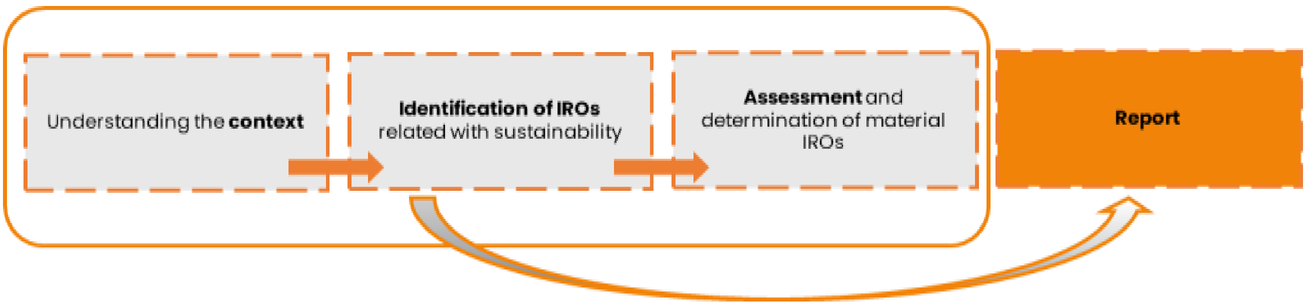
In 2024, CIE Automotive carried out its double materiality analysis, in line with the requirements established by the European Union Directive on Corporate Sustainability Reporting (CSRD), the requirements of ESRS 1 and ESRS 2, and European Financial Reporting Advisory Group (EFRAG) guidance.

Given that in 2025 there have been no substantial changes in the company's activity in relation to its organisational and operational structure, nor any material changes in external factors, and following EFRAG guidelines in this regard, CIE Automotive confirms that the results of the materiality analysis for the 2024 financial year remain relevant for the 2025 financial year, and therefore the conclusions reached previously will be used in the preparation of the sustainability statement. Consequently, the same Impacts, Risks and Opportunities (IROs) analysis will be maintained in 2025.

It is worth highlighting the monitoring and approval in 2024 by the ESG Committee of the double materiality analysis, which identified material impacts, risks and opportunities (IROs) in the field of sustainability, facilitating the integration of this understanding into the company's management mechanisms, valid for 2025.

The scope of the dual materiality assessment includes the actual and potential impacts, the risks and opportunities (IROs) related to CIE Automotive's own operations, as well as its upstream and downstream value chain, and taking into account its products, services and business relationships, covering all the regions in which it operates.

The method used for the dual materiality assessment comprises the following steps:



Understanding the context:

The first phase of the dual materiality study was to gain a full understanding of CIE Automotive's context, including its business model and its relationships with its stakeholders. The processes involved were a review of internal and external documentation, to also take into account the perspectives of external stakeholders, on the one hand, and consultations with the company's expert strategic partners, on the other hand.

Preparation of the list of Impacts, Risks and Opportunities (IROs):

To develop the list of IROs, the list of topics, subtopics and sub-subtopics of AR 16 of ESRS 1 was taken as a starting point. This selection was based on the information obtained during the initial phase of understanding the context, in which, as detailed in the relevant section, two rounds of interviews were conducted with internal interlocutors, and various internal and external sources of information were examined.

Once the list of potentially material issues was finalised, the impacts that could affect people or the environment, and the risks and opportunities arising from the company's impacts, were associated with each of the topics, sub-topics and sub-sub-topics. In addition, impacts that do not have linked risks and opportunities (R&O) were assessed as to whether they could generate financial impacts on the company.

Characterisation of the universe of IROs:

Once the list of IROs was completed, the relevant impact characterisation was carried out. This classification was carried out following the main findings of the context analysis, according to the following characteristics:

- **By ESRS, sub-topics and sub-sub-topics:** as set out in ESRS 1 AR 16 *Sustainability matters to be included in the materiality assessment*.
- **By status:** actual or potential, considering whether the impact is occurring, has occurred in the last five years or, conversely, has not yet occurred.
- **By type:** positive or negative, depending on the effects that the impact generates on the affected stakeholders.
- **By time horizon:** according to whether it was observed to have a short (reporting period), medium (next 5 years) or long term (from the next 5 years onwards) impact, in line with ESRS 1 *section 6.4. Definition of short-, medium- and long-term for reporting purposes*.
- **By point in the value chain:** depending on whether the source of the impact was in CIE Automotive's own operations or in its upstream or downstream value chain.
- **By stakeholder affected:** in accordance with the company's stakeholder model, depending on whether it affects society, public administrations, the industry, or CIE Automotive's business partners, shareholders, customers, suppliers and/or funders.

The risks and opportunities were classified according to the following metrics:

- **By type:** risk or opportunity, depending on whether they imply a decrease or an increase in EBITDA.
- **By origin:** depending on whether the origin is in the impact itself or in a dependency.

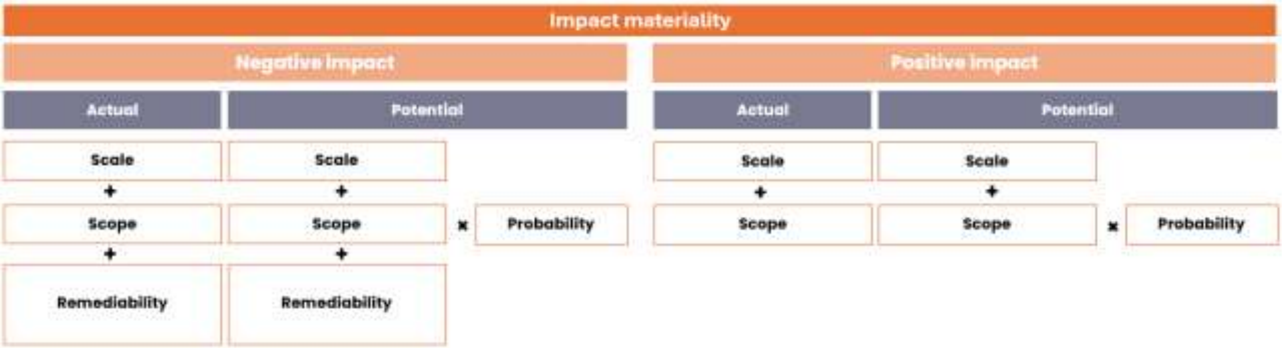
Assessment and determination of material IROs:

For the assessment, a differentiated scoring system has been established for impacts and risks and opportunities, respectively.

Impact materiality assessment system

According to ESRS 1 (paragraphs 45 and 46), the materiality of actual negative impacts is based on the severity of the impact, while for potential negative impacts it is based on the severity and likelihood of the impact. In turn, the severity is based on three factors: (1) the scale; (2) the scope; and (3) the irremediable character of the impact.

On the other hand, for positive impacts, materiality is based on the scale and scope of the impact for actual impacts, and the scale, scope and likelihood of the impact for potential impacts. A chart of the system is shown below.



According to AR 10, the characteristics of severity are described as follows:

- Scale: refers to the negative or positive severity of the impact on people or the environment.
- Scope: indicates the extent of the impacts on people or the environment.
- Irremediability: relates to the ability to remedy negative impacts: i.e., the possibility of restoring the previous state of the environment or of the people affected.

In addition, for potential impacts, the probability of occurrence must be taken into account:

- Probability: the likelihood that a potential impact will materialise, in the short, medium or long term. The time horizons established in the probability ranges are aligned with those set out in the corporate Risk Management and Control Policy.

For each of these metrics, related ranges were established to ensure the analysis was objective.

The impact assessment process has been carried out as an integrated process consisting of various phases with constant feedback. On the one hand, the company assessed the aggregate impacts by means of questionnaires and, on the other, the consultancy firm supporting CIE Automotive conducted a second impact assessment in parallel, based on external information analysed and inputs taken from two rounds of strategic interviews with CIE Automotive's stakeholders.

Financial assessment system

According to ESIS 1 paragraph 51, the materiality of risks and opportunities is based on their likelihood of occurrence, and the potential scale of the financial impacts determined on the basis of appropriate thresholds. The contribution of those risks and opportunities to financial effects in the short-, medium- and long-term was also considered.

For the ranges of these parameters, CIE Automotive's Risk Control and Management Policy was used as an input to align them as closely as possible with the company's risk map. Specifically, for the scale of the financial impact, impacts on EBITDA and on the company's reputation were considered, and the time horizons for assessing the likelihood are also aligned with this policy.

The risk and opportunity assessment process were carried out through questionnaires distributed to the company's stakeholders, which assessed the financial impact and probability of the company's previously identified aggregate impacts.

Consolidation of the impact materiality results

When determining the criteria to be used to consolidate CIE Automotive's assessments, the first step is to consider the assessments based on the internal work performed, the second step is to consider the assessments based on external sources, and the third step is to consider the final consolidation of both processes.

Final consolidation of the assessments

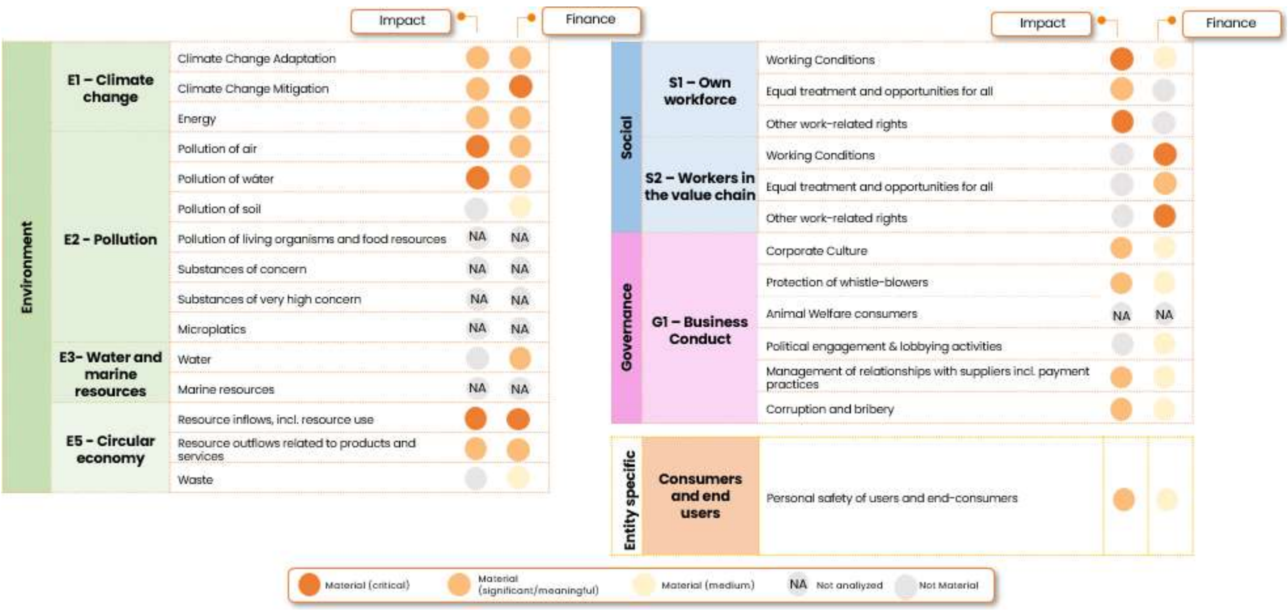
Once the discrepancies identified between the internal and external assessments had been resolved, it was determined that the impact scores would be the average of the results obtained from the assessments by CIE Automotive and EY (the consultant CIE Automotive used for this assessment), with the exception of the impacts for which discrepancies were identified and for which it was decided to prioritise one assessment or the other.

The dual materiality study is the starting point for the sustainability reporting. Dual materiality is the result of the sum of two dimensions: on the one hand, the impact perspective, which takes into account the impact that the company's activity generates on the environment in which it operates, and on the other hand, the financial perspective, which considers how conditions external to the company affect its economic performance.

Accordingly, an issue will be considered material when it falls into one of the following three categories:

- Material aspect from an impact perspective: A sustainability issue is material from an impact perspective when it generates actual or potential positive or negative impacts on people or the environment in the short, medium or long term.
- Material from a financial perspective: A sustainability issue is material from a financial perspective if it produces, or could reasonably be expected to produce, financial impacts on the company (development, financial position, financial performance, cash flows, access to financing or cost of capital) in the short, medium and long term.
- Material aspect from both perspectives: A sustainability issue is material from both perspectives.

The final results of the 2024 double materiality assessment, validated for 2025, are shown below in a table indicating which topics are material and their importance. In total, seven topics and one entity-specific disclosure topic have been identified.



1.1.4.2 Minimum disclosure requirement (DR) of the policies and actions

1.1.4.2.1 DR - Policies MDR-P: Policies adopted to manage material sustainability matters

The policies adopted by CIE Automotive to manage material sustainability matters are discussed throughout the Sustainability Report in the relevant sections:

- 2.2.3.2. DR E1-2: Policies related to climate change mitigation and adaptation
- 2.3.3.1.2 DR E2-1: Policies related to pollution
- 2.4.1.2 DR E3-1: Policies related to water and marine resources
- 2.5.1.2 DR E5-1: Policies related to resource use and circular economy
- 3.1.2.1. DR S1-1 – Policies related to own workforce
- 3.2.2.1. ESRS S2-1 – Policies related to value chain workers
- 4.1.2.2. DR G1-1 - Corporate culture and business conduct policies and corporate culture

1.1.4.2.2 DR - Actions MDR-A: Actions and resources in relation to material sustainability matters

The actions and resources related to material sustainability matters adopted by CIE Automotive are addressed throughout the Sustainability Report in the corresponding sections:

- 2.2.3.3. DR E1-3: Actions and resources in relation to climate change policies
- 2.3.3.1.3 DR E2-2: Actions and resources related to pollution
- 2.4.1.3 DR E3-2: Actions and resources related to water and marine resources
- 2.5.1.3 DR E5-2: Actions and resources related to resource use and circular economy
- 3.1.2.2. DR S1-2 - Processes for engaging with own workforce and workers' representatives about impacts
- 3.1.2.3. DR S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns
- 3.1.2.4. DR S1-4 - Taking action on material impacts on own workforce, and approaches to managing risks
- 3.2.2.2. DR S2-2 – Processes for engaging with value chain workers about impacts
- 3.2.2.3. DR S2-3 – Processes to remediate negative impacts and channels for value chain workforce to raise concerns
- 3.2.2.4. DR S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions
- 4.1.2.3. DR G1-2 – Management of relationships with suppliers
- 4.1.2.4. DR G1-3 – Prevention and detection of corruption and bribery

1.1.5 Metrics and targets

1.1.5.1 DR - Metrics MDR-M: Metrics in relation to material sustainability matters

The metrics related to material sustainability matters adopted by CIE Automotive are addressed throughout the Sustainability Report in the corresponding sections:

- 2.2.4. Metrics and targets
- 2.3.2 Metrics and targets
- 2.4.2 Metrics and targets
- 2.5.2 Metrics and targets
- 3.1.3. Metrics and targets
- 3.2.3. Metrics and targets
- 4.1.3. Metrics and targets

1.1.5.2 DR - Targets MDR-T: Tracking effectiveness of policies and actions through targets

The metrics related to material sustainability matters adopted by CIE Automotive are addressed throughout the Sustainability Report in the corresponding sections:

- 2.2.4. Metrics and targets
- 2.3.2 Metrics and targets
- 2.4.2 Metrics and targets
- 2.5.2 Metrics and targets
- 3.1.3. Metrics and targets
- 3.2.3. Metrics and targets
- 4.1.3. Metrics and targets

2. Environmental disclosures

2.1 Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

2.1.1 Compliance with the Climate Taxonomy Regulation (Regulation (EU) 2020/852)

CIE Automotive's business makes a decisive contribution to the decarbonisation of road transport because its parts can be used to manufacture zero-emission vehicles.

The climate taxonomy is a classification system of economic activities that breaks down the conditions of substantial contribution to attaining one or more of the six environmental objectives set by the European Union while doing no significant harm to the other five, in compliance with human rights and a series of minimum social safeguards defined by the ILO and the OECD.

Its main objective is to redirect economic investment flows towards decarbonisation ("Net Zero") through a dual action plan: helping financial sector companies decarbonise their portfolios, both in terms of assets and liabilities, and helping non-financial institutions (such as CIE Automotive) have greater opportunities to invest in technologies, products and services in line with the guidelines set out in the framework of the ecological transition.

An analysis of CIE Automotive's activity showed that its production processes, based on the application of various methodologies, fall under Spanish national economic activities code (CNAE) C29.3.2. Manufacture of components, parts and accessories for motor vehicles.

This economic activity is identified in Delegated Regulation 2023/2485 of 27 June 2023 under the environmental mitigation objective under code 3.18. Manufacture of automotive and mobility components, defined as follows:

*Manufacture, repair, maintenance, retrofitting, repurposing and upgrade of mobility components for zero-emission personal mobility devices and of automotive and mobility systems, components, separate technical units, parts and spare parts as defined in Article 3, points (18) to (21) and (23) of Regulation (EU) 2018/858 of the European Parliament and of the Council, type approved, designed, and constructed for use only in vehicles and buses of category M1, M2, M3, N1, N2 and N3, and in Article 3, points (15) to (18) and (21) in Regulation (EU) No 168/2013 of the European Parliament and of the Council*2, type approved, designed, and constructed for use only in vehicles of category L meeting the criteria set out in this Section and which are essential for delivering and improving the environmental performance of the vehicle.*

Consequently, as stated in Article 5 of Delegated Regulation 2023/2486 of 27 June 2023, the 2023 financial year was the first reporting year for this activity and therefore it was only mandatory to report on its eligibility, with the 2024 financial year being the first reporting year for alignment and 2025 the second. Furthermore, Delegated Regulation 2026/73 was published on 8 January 2026, but in accordance with Article 4 of that Regulation, the information is reported in accordance with the previous tables published in Regulation 2021/2178.

Finally, to comply with the requirements of the Regulations, a materiality analysis of the three indicators (turnover, CAPEX and OPEX) it was also carried out for the other activities described in the Regulations as follows.

Turnover

The key turnover indicator is calculated as the proportion of the company's revenues derived from eligible activities (numerator) over its total revenues (denominator). This revenue corresponds to revenue recognised in accordance with International Accounting Standard (IAS) 1, paragraph 82(a), as adopted by Commission Regulation (EC) No 1126/2008.

For 2025, CIE Automotive, S.A.'s eligibility indicator for revenue from CNAE activity code 3.18 was 14.23% (EUR 563,259 thousand in sales). This percentage was obtained by allocating each automotive part manufactured by each plant to each of the world's existing vehicle manufacturing platforms. To obtain the percentage of electric vehicles produced by all platforms, CIE Automotive uses information reported by *IHS Markit*, one of the world's largest global analyst firms in the industrial world, with a strong presence in the automotive industry. This company reports the percentage of pure electric vehicles manufactured globally by each platform, so that CIE Automotive was able to estimate, based on this data and its sales to each platform, the volume of its business linked to zero-emission vehicles.

CAPEX

This indicator is calculated as the ratio of fixed assets invested in eligible economic activities (numerator) to total assets acquired in 2025 (denominator). That denominator (total CapEx) is obtained as the additions to tangible and intangible assets before depreciation, amortisation, revaluations and impairments excluding changes in fair value. It also includes additions resulting from business combinations. Thus, total CAPEX covers costs that are accounted for in accordance with certain items of IAS 16, IAS 38, IAS 40, IAS 41 and IFRS 16. In 2025, the total CAPEX of the CIE Automotive Group amounted to EUR 277,421 thousand, excluding goodwill from acquisitions, which amounted to EUR 45,260 thousand, as indicated in Notes 7.1 and 7.2 to the Consolidated Financial Statements at the end of the 2025 financial year.

Regarding activity 3.18. Manufacture of automotive and mobility components, the total CAPEX was EUR 62,040 thousand. This amount is the result of work carried out under the direction of the corporate Controlling and Tax department, divided into two parts:

- First, the investment items were identified on a plant-by-plant basis using a homogeneous model and structure for the entire Group.
- Second, each line item under CapEx was linked with each of the existing vehicle manufacturing platforms in the world, using the same procedure that was used to identify the sales. In other words, it is cross-checked with the information extracted from the *IHS Markit* platform mentioned above.

In addition, in order to comply with the requirements of the Regulation, the analysis of the rest of the taxonomic activities has been carried out, with the aim of identifying whether there is CAPEX linked to other activities other than the main activity previously mentioned (3.18). Specifically, CAPEX associated with activities 7.3 Installation, maintenance and repair of energy efficient equipment and 7.6 Installation, maintenance and repair of renewable energy technologies has been identified. We conclude that this is close to 0% and therefore we have not proceeded to assess their alignment, focusing our calculation of eligible and aligned CAPEX on the main activity.

OPEX

This indicator is defined as the ratio of taxonomic eligible OPEX (numerator) to total taxonomic OPEX (denominator). This denominator reduces total operating expenses to non-capitalised direct costs that relate to research and development, building renovation measures, short-term leases, maintenance and repairs, as well as other direct expenses related to the day-to-day maintenance of tangible fixed assets by the company or a third party to whom activities are outsourced and that are necessary to ensure the continuous and efficient operation of these assets.

In 2025, the CIE Automotive Group's total taxonomic-eligible OPEX amounted to EUR 58,930 thousand, which represents 1.7% of the CIE Automotive Group's total OPEX in 2025 (EUR 3,525 million).Therefore, the taxonomic OpEx is considered non-material and, in accordance with section 1.1.3.2 of Annex I of the Delegated Regulation of 6 July 2021, the numerator of the indicator is reported as 0 and the denominator is also reported.

2.1.2 Table of Annex II Delegated Regulation (EU) 2021/2178

				Material contribution criteria						Do no significant harm criteria ("Do No Significant Harm")									
Economic activities	**Code**	**Turnover [thousands of €]**	**2025 turnover proportion**	**Climate change mitigation**	**Climate change adaptation**	**Water and marine resources**	**Pollution**	**Circular economy**	**Biodiversity and ecosystems**	**Climate change mitigation**	**Climate change adaptation**	**Water and marine resources**	**Pollution**	**Circular economy**	**Biodiversity and ecosystems**	**Minimum safeguards**	**Proportion of turnover conforming to taxonomy (A.1) or eligible under taxonomy (A.2), 2024**	**Enabling activity category**	**Transitional activity category**
ELIGIBLE ACTIVITIES ACCORDING TO TAXONOMY																			
A.1. Environmentally sustainable activities (complying with the taxonomy)																			
Manufacture of automotive and mobility components	CCM 3.18	563,259	14.23%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	**14.17%**		
Turnover from environmentally sustainable activities (which comply with the Taxonomy) A.1.		**563,259**	**14.23%**	**14.23%**	**0**	**0**	**0**	**0**	**0**								14.17%		
Of which: enabling		563,259	14.23%	14.23%	0%	0%	0%	0%	0%								**14.17%**	E	
Of which: transition		0	0%	0%													**0%**		
A.2. Eligible activities according to the taxonomy, but not environmentally sustainable (activities that do not comply with the taxonomy)																			
Manufacture of automotive and mobility components	CCM 3.18	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Turnover from eligible activities according to the taxonomy, but not environmentally sustainable (activities that do not comply with the taxonomy) A.2.		**0**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**								**0%**		
A. Turnover from ineligible activities according to the Taxonomy (A.1. + A.2.)		**563,259**	**14.23%**	**14.23%**	**0%**	**0%**	**0%**	**0%**	**0%**								**14.17%**		
B. ACTIVITIES NOT ELIGIBLE UNDER THE TAXONOMY																			
Turnover from ineligible activities according to the taxonomy		**3,394,994**	**85.77%**																
Total A + B		**3,958,253**	**100%**																

				Material contribution criteria						Do no significant harm criteria (“Do No Significant Harm”)									
Economic activities	**Code**	**Absolute CapEx [thousands of €]**	**2025 proportion of CapEx**	**Climate change mitigation**	**Climate change adaptation**	**Water and marine resources**	**Pollution**	**Circular economy**	**Biodiversity and ecosystems**	**Climate change mitigation**	**Climate change adaptation**	**Water and marine resources**	**Pollution**	**Circular economy**	**Biodiversity and ecosystems**	**Minimum safeguards**	**Proportion of CapEx conforming to taxonomy (A.1) or eligible under taxonomy (A.2), 2024**	**Enabling activity category**	**Transitional activity category**
ELIGIBLE ACTIVITIES ACCORDING TO TAXONOMY																			
A.1. Environmentally sustainable activities (complying with the taxonomy)																			
Manufacture of automotive and mobility components	CCM 3.18	62,040	22,36%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	37.41%		
Total CapEx of environmentally sustainable activities (which comply with the Taxonomy) A.1.		**62,040**	**22.36%**	**22.36%**	**0%**	**0%**	**0%**	**0%**	**0%**								**37.41%**		
Of which: enabling		62,040	22.36%	22.36%	0%	0%	0%	0%	0%								37.41%	E	
Of which: transition		0	0%	0%													0%		
A.2. Eligible activities according to the taxonomy, but not environmentally sustainable (activities that do not comply with the taxonomy)																			
Total CapEx from eligible activities according to the taxonomy, but not environmentally sustainable (activities that do not comply with the taxonomy) A.2.		**0**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**								**0%**		
A. CapEx from ineligible activities according the taxonomy (A.1. + A.2.)		**62,040**	**22.36%**	**22.36%**	**0%**	**0%**	**0%**	**0%**	**0%**								**37.41%**		
B. ACTIVITIES NOT ELIGIBLE UNDER THE TAXONOMY																			
Total CapEx of activities not eligible under the taxonomy		**215,381**	**77.64%**																
Total A + B		**277,421**	**100%**																

				Material contribution criteria						Do no significant harm criteria (“Do No Significant Harm”)									
Economic activities	**Code**	**Absolute OpEx [thousands of €]**	**2025 proportion of OpEx**	**Climate change mitigation**	**Climate change adaptation**	**Water and marine resources**	**Pollution**	**Circular economy**	**Biodiversity and ecosystems**	**Climate change mitigation**	**Climate change adaptation**	**Water and marine resources**	**Pollution**	**Circular economy**	**Biodiversity and ecosystems**	**Minimum safeguards**	**Proportion of OpEx conforming to taxonomy (A.1) or eligible under taxonomy (A.2), 2024**	**Enabling activity category**	**Transitional activity category**
ELIGIBLE ACTIVITIES ACCORDING TO TAXONOMY																			
A.1. Environmentally sustainable activities (complying with the taxonomy)																			
Total OpEx of environmentally sustainable activities (which comply with the Taxonomy) A.1.		**0**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**								**0%**		
Of which: enabling		0	0%	0%	0%	0%	0%	0%	0%								0%		
Of which: transition		0	0%	0%	0%	0%	0%	0%	0%								0%		
A.2. Eligible activities according to the taxonomy, but not environmentally sustainable (activities that do not comply with the taxonomy)																			
Total OpEx from eligible activities according to the taxonomy, but not environmentally sustainable (activities that do not comply with the taxonomy) A.2.		**0**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**								**0%**		
A. OpEx from ineligible activities according the taxonomy (A.1. + A.2.)		**0**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**								**0%**		
B. ACTIVITIES NOT ELIGIBLE UNDER THE TAXONOMY																			
Total OpEx of activities not eligible under the taxonomy		**58,930**	**100%**																
Total A + B		**58,930**	**100%**																

Below are the summary tables from ANNEX II of 2023/2486 for each of the three indicators: turnover, CAPEX and OPEX:

	Proportion of turnover	
	Compliant with taxonomy by objective	Eligible according to taxonomy by objective
CCM	14.23%	14.23%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

	Proportion of total CAPEX	
	Compliant with taxonomy by objective	Eligible according to taxonomy by objective
CCM	22.36%	22.36%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

	Proportion of total OPEX	
	Compliant with taxonomy by objective	Eligible according to taxonomy by objective
CCM	0%	0%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

2.2 Climate change (ESRS E1)

2.2.1 Governance

2.2.1.1 DR related to ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes

E1–GOV-3– 13	*The undertaking shall disclose whether and how climate-related considerations are factored into the remuneration of members of the administrative, management and supervisory bodies, including if their performance has been assessed against the GHG emission reduction targets reported under Disclosure Requirement E1-4 and the percentage of the remuneration recognised in the current period that is linked to climate related considerations, with an explanation of what the climate considerations are.*

As stated in the response to *ESRS 2-GOV-3–29 a)*, the company has an incentive scheme for senior management linked to sustainability issues. Sustainability at CIE Automotive has been measured through compliance with the objectives and indicators of the ESG 2025 Strategic Plan, which include climate-related considerations, including, among others, the GHG emissions reduction targets reported under Disclosure Requirement E1-4.

In 2025, the proportion of variable remuneration dependant on sustainability-related targets or impacts was 10% of total incentives, which are a percentage of gross remuneration, with the percentage varying according to the responsibilities of each member of senior management.

The bonuses related to sustainability goals or impacts include climate considerations, with their weigh varying according to the responsibility of each member of senior management.

2.2.2 Strategy

2.2.2.1 DR E1-1: Transition plan for climate change mitigation

E1–1-14 AR 1	*The undertaking shall disclose its transition plan for climate change mitigation.*

In 2021, CIE Automotive published its Strategic Plan, which contains both an operational part and an Environmental, Social and Governance (ESG) part, and was published under the name "2025 ESG Strategic Plan".

The environmental part of the plan is periodically reviewed by the Group's Engineering, Quality and Environment department. This review is included in the **Environmental Management Plan**, where in its 2024 version, which remains in force in 2025 with the addition of the Decarbonisation Plan carried out during 2025, these are the points that have been reviewed:

- The Group's governance regarding the environment, in particular, climate change, including reporting of environmental performance issues.
- A dependency analysis of the Impacts, Risks and Opportunities (IROs), with a focus on resilience analysis. The dependencies follow the approach of the Carbon Disclosure Project (CDP), which is part of the double materiality analysis, showing the dependencies that the company has on the various factors. This analysis includes:
    - Management of IROs
    - Analysis procedure
    - Risks and opportunities
        - Transition climate IROs.
        - Physical climate IROs.
        - Circularity.
        - Pollution.
        - Water.
- Targets and metrics
    - Short term.
    - Medium term.
    - Net-Zero.
    - Tracking.
- Emissions by region and technology

- CIE Automotive's response
    - CIE Automotive's Model.
    - Flexibility.
    - Resilience.
    - *Supply Chain Race2Zero* project.
- Action Plan:
    - Levers.
    - Projects.
    - Blocked assets.
    - Metrics.
    - Performance indicators.

In December 2022 CIE Automotive committed to set targets within 24 months, aligned with limiting global warming to 1.5°C in line with the Paris Agreement and the EU's 2050 net-zero target, based on science.

By 2024, the company fulfilled this commitment by joining the 235 companies in the automotive and parts sector with targets approved by the *Science Based Targets initiative* (SBTi). As of 10 February 2026, only 39 companies (including CIE Automotive) in the automotive sector have targets aligned with both 1.5°C and targets that include scopes 1, 2 and 3.

This 2024 **Environmental Management Plan**, which remains in force in 2025 with the addition of the Decarbonisation Plan implemented during 2025, is in line with the structure of a transition plan.

E1 – 1 – 16 a) *AR 2*	*The information required by paragraph 14 shall include: (a) by reference to GHG emission reduction targets (as required by Disclosure Requirement E1-4), an explanation of how the undertaking's targets are compatible with the limiting of global warming to 1.5°C in line with the Paris Agreement*

The *Science Based Targets initiative* (SBTi) has validated that the science-based greenhouse gas emission reduction targets presented by CIE Automotive are in line with its criteria and recommendations. The SBTi classified the company's scope 1 and 2 targets as being in line with the 1.5°C trajectory.

In this regard, CIE is committed to:

- Overall Net-Zero Target: to meet the net-zero target for greenhouse gas emissions across the Value Chain by 2050.
- Short- to medium-term targets: to reduce its absolute Scope 1 and 2 GHG emissions by 57.9% by 2033 from base year 2021. In addition, CIE Automotive is committed to reducing its absolute Scope 3 GHG emissions by 54.6% by 2033 from 2021 as a base year.
- Long-term targets: to reduce its absolute Scope 1, 2 and 3 GHG emissions by 90% by 2050 from 2021 as a base year.

In addition, CIE Automotive continues to pursue the objectives set out in its ESG Strategic Plan, which ended in 2025, in addition to the 2033 and 2050 objectives committed to under the SBT initiative, which are incorporated into the plan to achieve the commitment to limit global warming to 1.5°C in line with the Paris Agreement.

	Objective Cumulative 2021-2025	Compliance, 2025 vs. 2024	Cumulative Compliance, 2021-2025
Reduction of energy consumption intensity within the organisation – Reduction of energy consumption (electricity) – Reduction of energy consumption (gas)	-8.24%	-3.94%	-18.71%
Reduction of direct (Scope 1) GHG emissions	-8.24%	+4.43%	-11.58%
Reduction of indirect (Scope 2) GHG emissions generating energy	-21.55%	+5.03%	-34.82%
Reduction of intensity of direct and indirect (Scopes 1+2) GHG emissions	-12.55%	+4.86%	-29.68%
Decrease the total amount of waste generated and not recycled	-21.55%	+23%	-0.14%
Reduce the intensity of water abstraction	-8,24%	+7.55%	-7.21%

As indicated under *E1-1-14*, these targets are part of the environmental management plan in line with the structure of a transition plan.

E1 – 1 – 16 b)	*The information required by paragraph 14 shall include: (b) by reference to GHG emission reduction targets (as required by Disclosure Requirement E1-4) and the climate change mitigation actions (as required by Disclosure Requirement E1-3), an explanation of the decarbonisation levers identified, and key actions planned, including changes in the undertaking's product and service portfolio and the adoption of new technologies in its own operations, or the upstream and/or downstream value chain*

Key levers and projects were identified in the Environmental Management Plan and in the Decarbonisation Plan that will help achieve the targets and objectives mentioned in the previous points and in that plan.

Adopt technologies to attain:

- Reduced energy and raw material consumption:
  - o Ecodesign with a product and process approach.
  - o Efficiency through Industry 4.0 technologies.
- Switch to natural gas from non-renewable sources such as:
  - o Induction.
  - o Oxy-combustion.
  - o Use of biogas.
  - o Electrification.
  - o Use of green hydrogen.

-Use of secondary or recycled materials:
  - o Steel.
  - o Aluminium.
  - o Technical or decorative plastics.
  - o Chemical bonding elements.
  - o Fabrics.

Supply Chain Race2Zero project, to work together with the value chain to ensure its alignment, consulting and training.

Digitilization of the environmental data management process and connection with the Value Chain.

Launch of Product Carbon Footprint analysis to identify opportunities and actions for more effective impact reduction.

The action plan for decarbonisation and guidelines to be implemented throughout the period up to the target date of 2033 have also been communicated to the Group's various plants:
- Eco-design.
- Improve gross-to-net weight ratio.
- Industry 4.0.
- Waste reduction.
- Eco-efficiency.
- Renewable electricity (where available)
- Replacement of forklifts.
- Fleet electrification.
- Applicability study for photovoltaic installations.

Similarly, CIE Automotive's strategic plan has already envisaged pillars to address changes in the products and technologies the Group offers:

- Electrification: actively working to incorporate parts designed for electric and electrified vehicles.
- Internationalization, as a key to flexibility and resilience.
- Comfort, as a key trend in electric, autonomous and connected vehicles, where user experience plays a main role. Increasing actions to promote the products supplied in this area.
- Industry 4.0 as a fundamental to resource efficiency and a lever for competitiveness.
- CIE Culture. A solid foundation of flexibility, resilience, commitment to people and their environment.
- Ethical commitment.
- Eco-efficiency for managing all our resources and assets.
- Active listening.

E1 – 1 – 16 c)	*The information required by paragraph 14 shall include: (c) by reference to the climate change mitigation actions (as required by Disclosure Requirement E1-3), an explanation and quantification of the undertaking's investments and funding supporting the implementation of its transition plan, with a reference to the key performance indicators of taxonomy-aligned CapEx, and where relevant the CapEx plans, that the undertaking discloses in accordance with Commission Delegated Regulation (EU) 2021/2178.*

As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The figures given are for the Strategic Plan as a whole and not just for one action or just for the environment area.

E1 – 1 – 16 d) *AR 3*	*The information required by paragraph 14 shall include: (d) a qualitative assessment of the potential locked-in GHG emissions from the undertaking's key assets and products. This shall include an explanation of if and how these emissions may jeopardise the achievement of the undertaking's GHG emission reduction targets and drive transition risk, and if applicable, an explanation of the undertaking's plans to manage its GHG-intensive and energy-intensive assets and products.*

As part of the analysis carried out, the assets and products with the greatest difficulty in decarbonisation were identified.

With regard to Scope 1 emissions, the main assets are furnaces that use natural gas as their base energy. As explained under *E1–1–16b*, one of the levers and projects that have been launched are linked to this point, with the objective of eliminating this decarbonisation barrier, as perfectly identified lines that aim to provide a solution to this problem in the medium and long term. The phased introduction of the following technologies is explained above:

- Induction.
- Oxy-combustion.
- Use of biogas.
- Electrification.
- Use of green hydrogen.

CIE Automotive's strategy is based on using generic means, which means that no high risk was identified on the product side. This is one of the strengths of the Group's flexible model and its position as a provider of technologies and processes to systems suppliers.

While the analysis of the use phase category for scope 3 emissions aligned with SBTi standards was included for the year 2024, CIE Automotive is a technology provider, which means the OEMs are the ones that are responsible for reducing use phase emissions and defining their product sales mix.

CIE Automotive helps reduce this category by aligning its value chain to achieve decarbonisation of the fleet of vehicles sold. However, it has almost no relevant participation or influence in this category.

E1 – 1 – 16 e) *AR 4*	*The information required by paragraph 14 shall include: (e) For undertakings with economic activities that are covered by delegated regulations on climate adaptation or mitigation under the Taxonomy Regulation, an explanation of any objective or plans (CapEX, CapEx plans, OpEX) that the undertaking has for aligning its economic activities (revenues, CapEx, OpEx) with the criteria established in Commission Delegated Regulation 2021/2139.*

As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The figures indicated are for the Strategic Plan as a whole and not just for one action or only for the area of the environment.

E1 – 1 – 16 g)	*The information required by paragraph 14 shall include: (g) A disclosure on whether or not the undertaking is excluded from the EU Paris-aligned Benchmarks.*

CIE Automotive is not excluded from the European Union's Paris Agreement Benchmarks.

E1 – 1 – 16 h)	*The information required by paragraph 14 shall include: (h) An explanation of how the transition plan is embedded in and aligned with the undertaking's overall business strategy and financial planning.*

The above points have described the overlap between the company's Environmental Management Plan and its Strategic Plan, as well as the fact that the Environmental Management Plan 2024, which remains in force and has been supplemented by the Decarbonisation Plan, is in line with the structure of a transition plan.

The Environmental Management Plan arose, in essence, from the revision of the 2025 Strategic Plan and is therefore fully integrated and aligned with it, with the strategic lines being especially oriented towards facing the challenges generated at a global level, in the automotive sector and in the automotive components sector. In these areas, the fight against climate change is key and the source of many of the changes in which the sector is involved. This is why the financing of the strategic plan contemplates and integrates the lines mentioned in the previous points.

E1 – 1 – 16 i)	*The information required by paragraph 14 shall include: (i) Whether the transition plan is approved by the administrative, management and supervisory bodies.*

The Environmental Management Plan was presented to CIE Automotive's ESG Committee under CIE Automotive's *ESG Roadmap* in the first quarter of 2024, after being submitted to, and accepted by, the company's CEO. Its progress has been presented to the ESG committee during 2025.

E1 – 1 – 16 j)	*The information required by paragraph 14 shall include: (j) An explanation of the undertaking's progress in implementing the transition plan.*

The Environmental Management Plan has a long-term horizon. However, projects have already been launched that are associated with key levers such as:

- Furnace project.
- Project to digitalise the environmental data management process.
- Materials project, focusing on sustainable materials.
- *Supply Chain Race2Zero* project.
- Launch of global guidelines.
- Launch of Product Carbon Footprint Calculation.

As mentioned under E1–1–16a, there is already significant progress in reducing our environmental impact as measured by the indicators shown in the table under that standard.

In addition, the engineering division has achieved the objectives of the following indicators:

- Implementation of Industry 4.0 initiatives
- Circularity projects

In turn, the project to improve the ratio between the gross and net weight of key projects is one of the actions in the plan that has a cross-cutting impact on various objectives and targets, as explained under *E1-3-28* and *E1-4-32*, and has been successfully completed in 2025.

2.2.2.2 DR related to ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

ESRS 2 – SBM-3 – 18	*The undertaking shall explain for each material climate-related risk it has identified, whether the entity considers the risk to be a climate-related physical risk or climate-related transition risk.*

As stated in datapoint *ESRS 2-IRO-2-59*, given that in 2025 there have been no substantial changes in the company's activity in relation to its organisational and operational structure, nor any material changes in external factors, and following EFRAG guidelines in this regard. Therefore, the same climate risks analysis is maintained in 2025.

During 2025, special emphasis has been placed on communicating the analysis process and its results in different geographical areas, in many cases taking advantage of environmental forums held.

The climate risks the group is exposed to and that were assessed in the course of drawing up its risk map are listed below:

Climate-related transition risks

1. Market risk (as a weighting of the following risks)
    a. Margin risks: It falls under climate change adaptation and climate change mitigation.
    b. Product mix risks: It falls under climate change adaptation and climate change mitigation.
    c. Location risks: It falls under climate change adaptation and climate change mitigation.
    d. Investment risks: It falls under climate change adaptation, climate change mitigation and energy.

2. Technology risk (as a weighting of the following risks)
    a. Technological risks: It falls under climate change adaptation and climate change mitigation.
    b. Manufacturing process risks: It falls under climate change adaptation and climate change mitigation.
    c. Supply chain risks: It falls under climate change adaptation and climate change mitigation.

3. Political and legal risks: It falls under climate change adaptation, climate change mitigation and energy.

4. Reputational risks: It falls under climate change adaptation, climate change mitigation and energy.

Physical climate risks

5. Acute physical risks: Under climate change adaptation and climate change mitigation.
    a. Increased water accumulation in rainy periods.
    b. River flooding.
    c. Increased heat index.
    d. Water scarcity.

6. Chronic physical risks: It falls under climate change adaptation and climate change mitigation.
    a. Average temperature increase.
    b. Increase in the number of extremely hot days.
    c. Threat to the state of ecosystem services.
    d. Increased droughts.
    e. Decreased precipitation.
    f. Fewer rainy days.

ESRS 2 – SBM-3- 19 a) AR 6	*The undertaking shall describe the resilience of its strategy and business model in relation to climate change. This description shall include*: ***(a) the scope of the resilience analysis***.

The resilience analysis is based on external and internal analyses, including of the management model and business strategy. This is all part of the dependency and impact analysis supporting the analysis of risks and opportunities. As noted above, the dependencies follow the approach of the Carbon Disclosure Project (CDP), which is part of the double materiality analysis, showing the dependencies that the company has on the various factors. The internal analysis seeks to study how the company is progressing and the various aspects that condition it internally, and the external analysis looks at how the external context is evolving with a value chain approach and how the company depends on both analyses for its development. This process covers all of CIE Automotive's locations, technologies and divisions, as mentioned with the inclusion of the value chain. The Group's sensitivity and adaptation and its ability to take mitigation measures demonstrate its resilience.

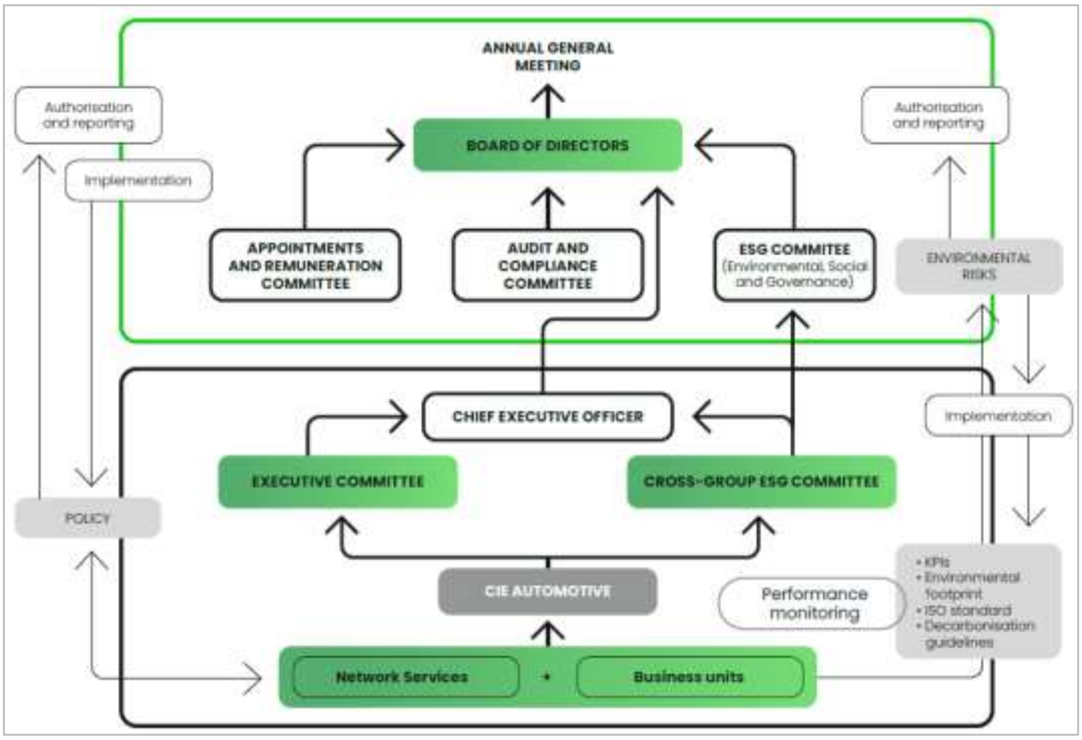
ESRS 2 – SBM-3-19 b) AR 7a, AR 7b, 7c and AR 13	*The undertaking shall describe the resilience of its strategy and business model in relation to climate change. This description shall include*: ***(b) how and when the resilience analysis has been conducted, including the use of climate scenario analysis as referenced in the Disclosure Requirement related to ESRS 2 IRO-1 and the related application requirement paragraphs.***

The Group's resilience and impacts, risks and opportunities (IROs) are analysed together. This way the analysis is done in a single process, whether for general analyses, related to climate change, or for other areas such as water resources. To this end, additional features are added to the climate change analysis, such as proactivity in the study, including tools such as an analysis of vulnerability, sensitivity and adaptation plans or actions.

This analysis is conducted every two years. Therefore, the results from 2024 remain valid.

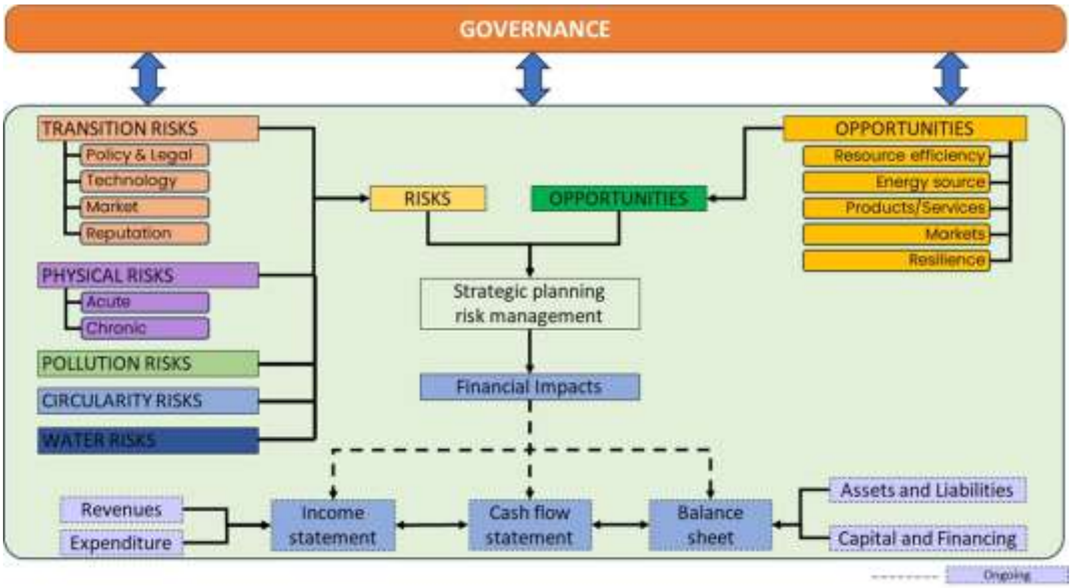
One of the reasons for pursuing a single analysis model is the high-level integration with the overall process (ESRS E1) which is described in *ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities*.

For the entire environmental domain, in particular, the process of risk and opportunity analysis and resilience is explained below. The process is fully integrated in the Group, with levels involved from the General Meeting to the operating units, as shown in the illustration below:

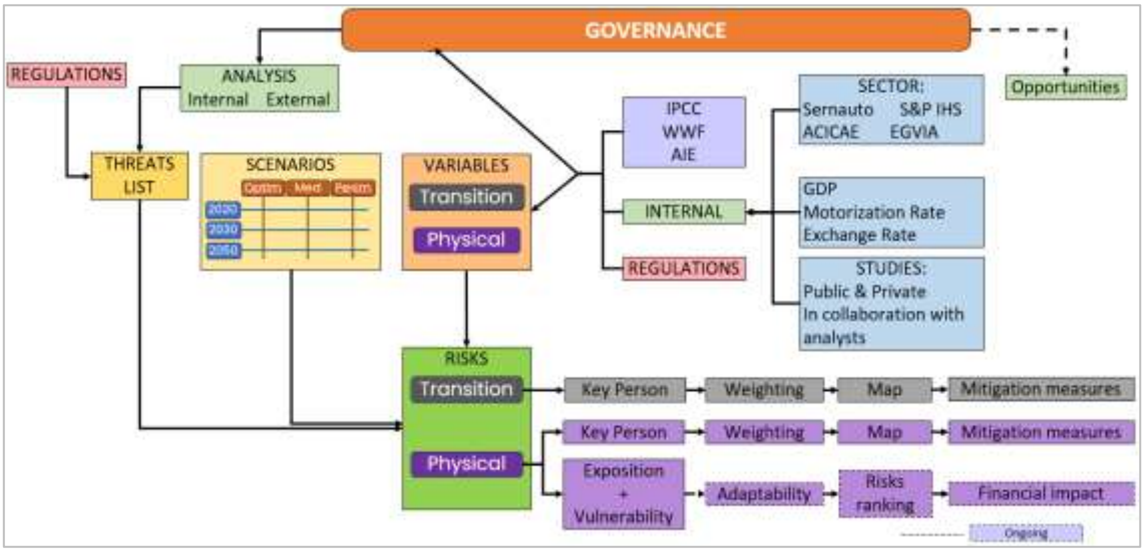


The chart illustrates the environmental governance system, which includes setting and implementation of policies, environmental and climate risk management, tracking and implementation of measures, and mitigation actions through indicators and monitoring tools. It shows how all levels of the company are involved, from the General Meeting to the Operating Units.

The details of the system and duties are set out in the Regulations of the Board and the Committees, including the ESG Committee, which are posted on the company's website in the Corporate Governance section. This governance model will appear as the top layer in the climate risk management discussed in detail below.



The resilience analysis begins with a study of vulnerabilities which is fed by the above external and internal analysis, in which quantitative and qualitative variables are considered, and this process yields, among other concepts, the threats that need to be assessed. This is shown in the following illustration:



The threat and impact selection process are based on the analysis of quantitative data, such as vehicle productions and sales in all regions in the short, medium and long term provided by S&P IHS, motorisation rates, and GDP per country or the evolution of different types of vehicle propulsion. Public and private quantitative studies are also analysed, along with those from sectoral entities such as EGVIA, SERNAUTO or ACICAE.

This reflects the impacts and dependencies between the forces stemming from trends, macroeconomic policies, energy use and mix, and technological assumptions.

This process has been evolving for several years and is part of the review of the 2025 Strategic Plan. It was launched in 2024 and, as explained above, remains in force and is contrasted with the results of the process explained in *ESRS 2 IRO-1*.

To make the analysis more robust, various time horizons and climate scenarios have been included:

Three climate scenarios:

- Optimist: Based on the representative concentration pathway RCP2.6 and shared socioeconomic pathway SSP1 in line with the Intergovernmental Panel on Climate Change (IPCC).
- Current trend: Based on RCP4.5 and SSP2 pathway in line with the IPCC.
- Pessimist: Based on RCP7.0 and SSP3 pathway in line with the IPCC.

The Representative Concentration Pathways (RCPs) and Shared Socioeconomic Pathways (SSPs) are frameworks developed by the Intergovernmental Panel on Climate Change (IPCC) to model future climate change.

- Representative Concentration Pathways (RCPs): These are greenhouse gas emission scenarios based on different concentrations of CO_2 in the atmosphere until 2100. The main ones are RCP2.6, RCP4.5, RCP6.0 and RCP8.5, where higher numbers indicate higher levels of emissions and global warming.
- Shared Socioeconomic Pathways (SSPs): These represent various global socioeconomic futures (e.g. economic growth, climate policies, inequality) that affect mitigation and adaptation capacity. They are combined with the RCPs to generate more realistic projections of climate change**.**

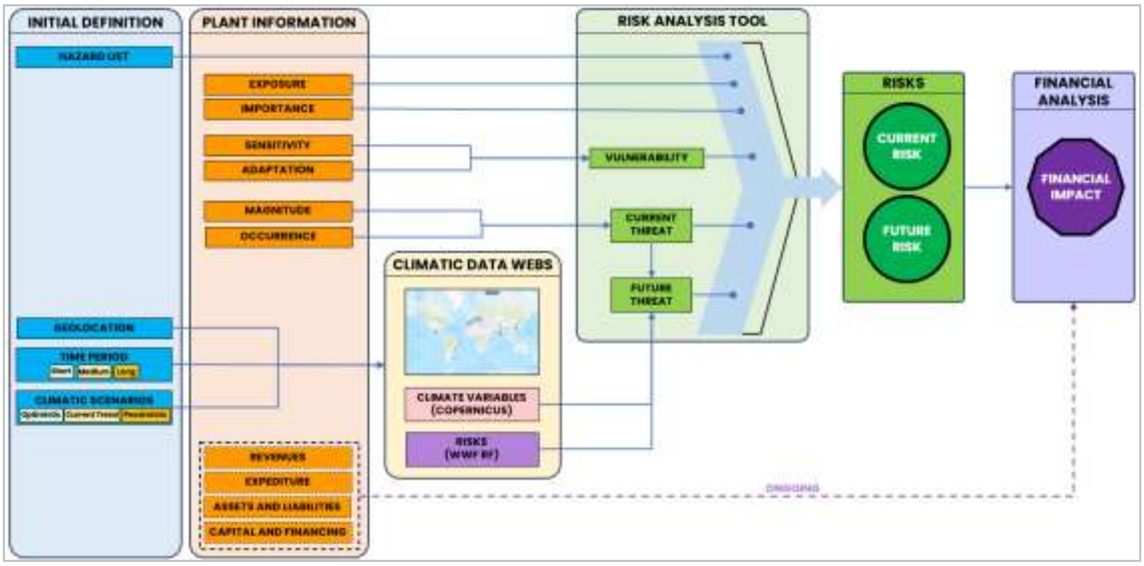
And three time horizons:

- Current or short term (2020-25).
- Medium term (2030).
- Long term (2050).

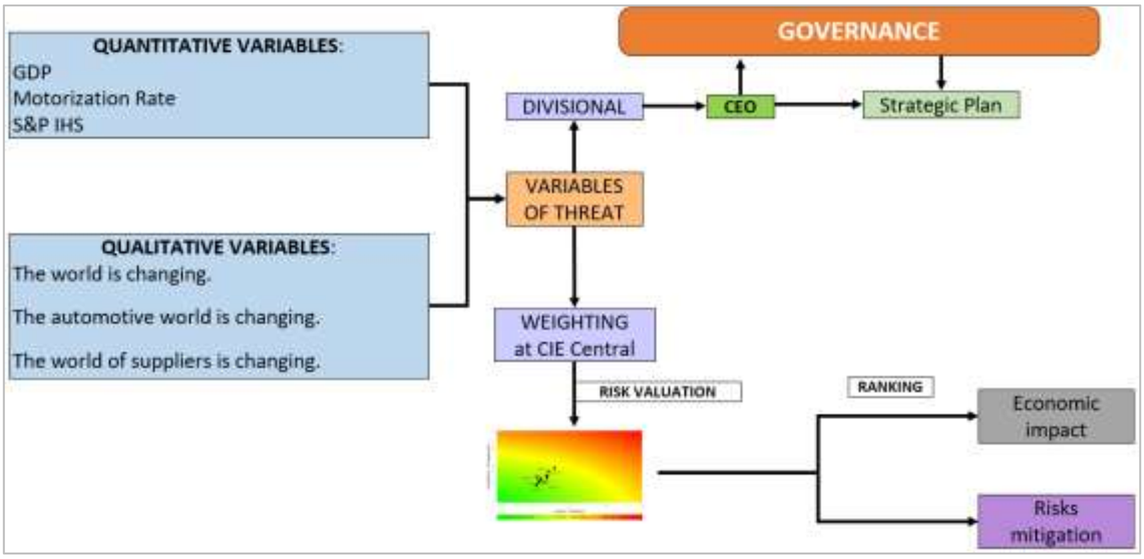
In the current or short-term horizon, the current year 2025 is not indicated, but rather a period 2020-2025, given that many of the variables and parameters are not accessible for 2025, or are not accessible in 2025 in all geographical areas, therefore the closest data to 2025 that is accessible in all geographical areas is used, and in the worst case it can refer to 2020.

For **physical climate risks** (including those associated with water and marine resources), a more detailed study is performed with a greater level of detail for chronic and acute risks, taking into account the GPS positioning of CIE Automotive's various production plants.

The complete process is shown in the following chart:



For the grouped **physical risks**, as in the case of **transitional climate risks**, pollution, circularity and the qualitative part of the water-related risks (mainly potential pollution, materiality and financial impact) the process is different, as it is not linked as closely to the physical location of the production plants and is explained in the following chart:



This approach has the advantage of also assessing risk from an economic point of view. This assessment is based on surveys sent to key people in the organisation.

In this case, the climate scenarios are based on the evolution of the price of carbon rights according to the International Energy Agency (IEA). The criteria for the selection of scenarios is more aligned with the objective of also looking for economic impacts.

Three climate scenarios:

- Stated Policies Scenario (STEPS): this scenario reflects not only current policies, but also policy plans announced to date. It focuses only on initiatives that have already been announced, highlighting the consequences of current decisions, without speculating on possible future changes.
- Announced Pledges Scenarios (APS): this shows the extent to which the stated targets and ambitions can reduce emissions to achieve carbon neutrality by 2050. It includes all recent national announcements up to August 2024, and as it is a biennial analysis, it remains valid both for 2030 targets and long-term commitments, regardless of whether they are backed by legislation. It assumes that countries will meet their targets on time, which will influence global demand for fossil fuels and clean energy.
- Net Zero Emissions Scenario: this is a policy scenario showing a pathway for the global power sector to achieve net zero CO_2 emissions by 2050, with advanced economies reaching this target earlier. It also meets key sustainable development goals, such as universal energy access by 2030 and significant improvements in air quality. This scenario is consistent with limiting global temperature increase to 1.5ºC, according to the IPCC's Sixth Assessment Report.

And three time horizons:

- Current or short term (2020-25).
- Medium term (2030).
- Long term (2050).

The current or short-term horizon does not refer to the current year 2025, but rather to the period 2020-2025, given that many of the variables and parameters are not accessible for 2025 or are not accessible in 2025 in all geographical areas. Therefore, the data closest to 2025 that is accessible in all geographical areas is used, which in the worst-case scenario may refer to 2020.

As can be seen, the vulnerability part is followed by the adaptability analysis part. The mitigation plan entails linkage with metrics for monitoring and continuously correcting the actions and the plan according to its evolution. This exercise is therefore reviewed on a regular basis.

Of course, as mentioned above, this process is shown to be integrated with the analysis of impacts, risks and opportunities (IROs). This aspect will therefore be addressed below under *ESRS 2 - IRO-1 – 20 a-c* and *ESRS 2- IRO-1 – 21*.

ESRS 2 – SBM-3- 19 c) AR 8a and 8b	*The undertaking shall describe the resilience of its strategy and business model in relation to climate change. This description shall include:* ***(c) the results of the resilience analysis including the results from the use of scenario analysis****.*

As stated in datapoint *ESRS 2-IRO-2-59*, given that in 2025 there have been no substantial changes in the company's activity in relation to its organisational and operational structure, nor any material changes in external factors, and in accordance with EFRAG guidelines in this regard. Therefore, the same climate risks analysis is maintained in 2025.

During 2025, special emphasis has been placed on communicating the analysis process and its results in different geographical areas, in many cases taking advantage of environmental forums held.

The climate risks the group is exposed to and that were assessed in the course of drawing up its risk map are listed below:

Climate-related transition risks

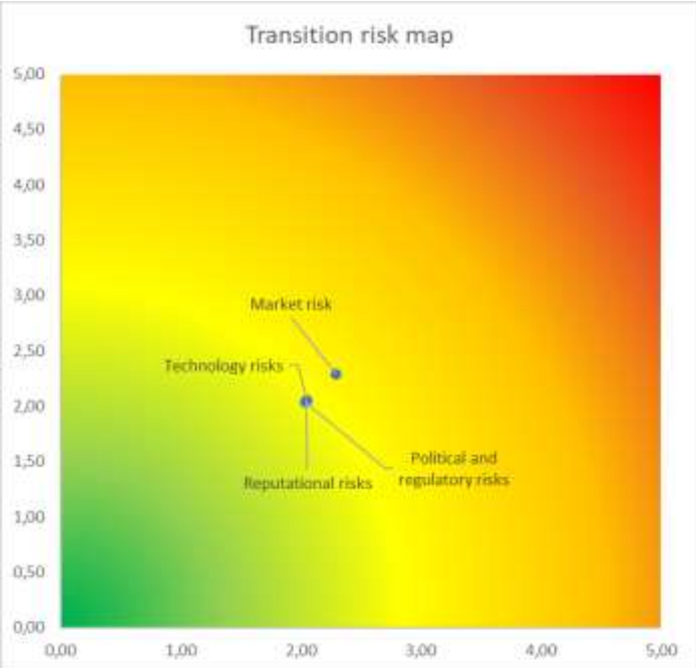
1. Market risk (as a weighting of the following risks):
   a. Margin risks (RS06.10).
   b. Product Mix Risks (RS06.4).
   c. Location risks (RS06.12).
   d. Investment risks (RS06.11).
2. Technology risk (as a weighting of the following risks):
   a. Technological risks (RS06.2).
   b. Manufacturing process risks (RS06.3).
   c. Supply chain risks (RS06.9).
3. Political and legal risks (RS06.1).
4. Reputational risks (RS06.5).

Physical climate risks

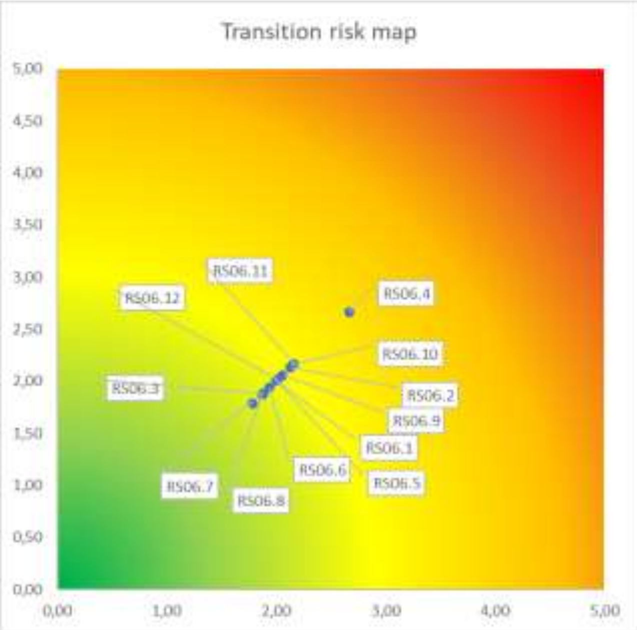
5. Acute physical hazards (RS06.6):
    a. Increased water accumulation in rainy periods.
    b. River flooding.
    c. Increased heat index.
    d. Water scarcity.
6. Chronic physical risks (RS06.7):
    a. Average temperature increase.
    b. Increase in the number of extremely hot days.
    c. Threat to the state of ecosystem services.
    d. Increased droughts.
    e. Decreased precipitation.
    f. Fewer rainy days.

Regarding the transition risks, none of them in any of the scenario and time horizon combinations has a risk higher than 3 (medium). The highest risk occurs in the product mix risk in 2050, in conjunction with the Net Zero Emissions scenario, with a value of 2.8. There is also no risk with a probability greater than 3 out of 5.

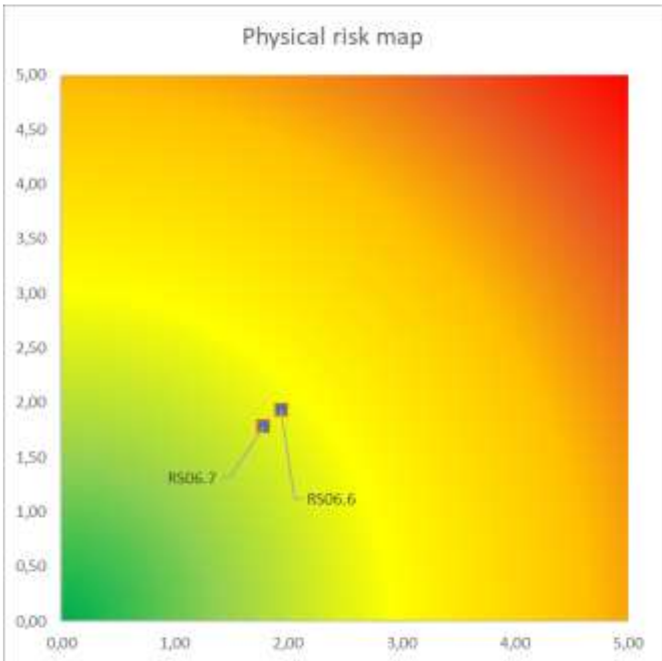
This heat map illustrates the transition risks projected for the year 2050 under the APS (Announced Pledges Scenario). The y-axis represents the risk level, while the x-axis indicates the probability of occurrence.



If the risks are broken down:

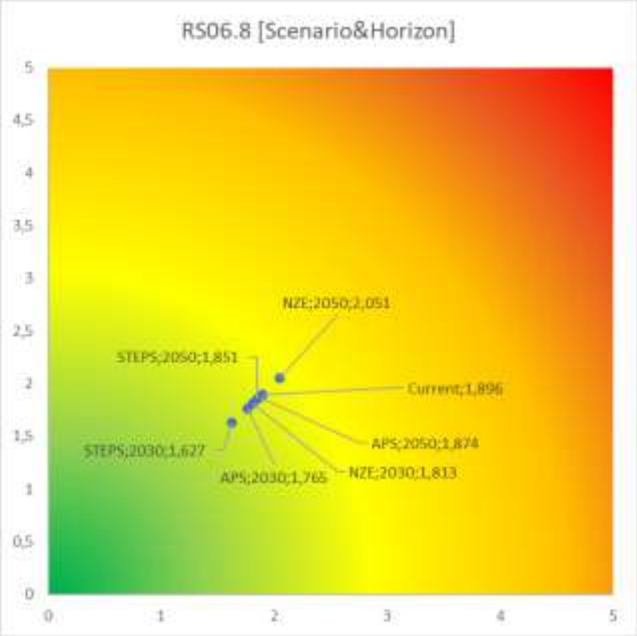


In the case of physical risks, a double analysis has been carried out, the first based on the same methodology as the rest of the risks. In this way, economic impacts can be obtained, albeit quantitatively, by assessing the impact in terms of EBITDA. The results of this first simple analysis are shown in the following graph, grouped together. The detailed analysis of physical risks, with their specific methodology, is detailed later in this section:



In addition, as an example of how the outcome of the scenario analysis affects the level of risk, the following illustration shows the evolution of transition risk RS06.4 (market mix risk) as a function of the scenario and the time horizon.

The following graph shows Risk RS06.8 (water stress risk) and its evolution in the various scenarios and time horizons.



To support the nomenclature of the graphs, the risks have previously been classified according to a coding. For example, RS06.8 is the risk of water stress. In "STEPS;2050;1.851", "STEPS" refers to the scenario used in that point, "2050" to the time horizon and "1.851" to the value of that point in risk level.

For physical risks, the assessment process was done with a more detailed analysis. It is based on the OCARA methodology, in which the analysis carried out is detailed at the level of each relevant process affecting each of the locations.

The *Outil de Cartographie des Risques et des Attaques* (OCARA) methodology is a French approach designed for risk analysis in information systems. It is based on mapping risks and attacks to identify and assess threats to critical assets. This was then supplemented with the methodological approaches proposed by the IPCC and the French Ecological Transition Agency. This methodology divides the company's environment into scopes, with Scope A being the most internal and Scope B involving external elements. Within each scope, an exhaustive analysis is made of each macro-process that the company carries out in the course of its business. Then they are broken down to a higher level of detail which are the processes, which are shown in the following table, divided into scope A and scope B.

This methodology ensures that all of the processes and aspects arising in the company's activity are taken into account with a value chain approach.

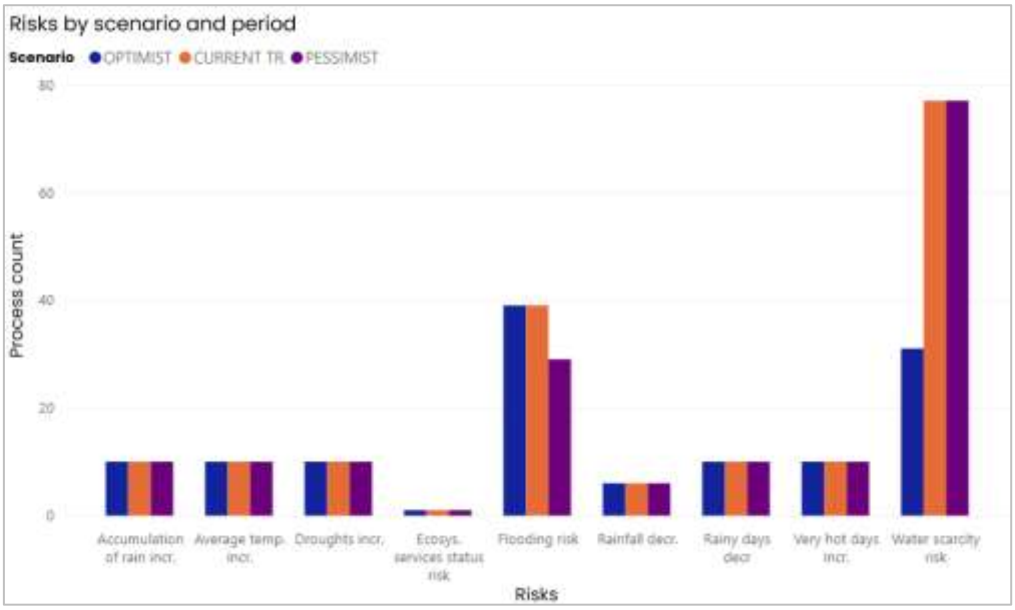
Processes analysed:

Scope	No.	Process
A	1.1	Commercial buildings
	1.2	Warehouses
	1.3	Industrial buildings
	1.4	Internal roads
	2.1	Dry products
	2.5	Storage of hazardous waste (toxic, chemical)
	3.1	Indoor production conditions
	3.2	Outdoor production conditions
	3.3	Working conditions of employees and providers of indoor on-site transport services
	3.4	Working conditions of employees and providers of outdoor on-site transport services
	4.1	Network and on-site data centres, other data capture/transmission equipment
	4.2	Power supply equipment

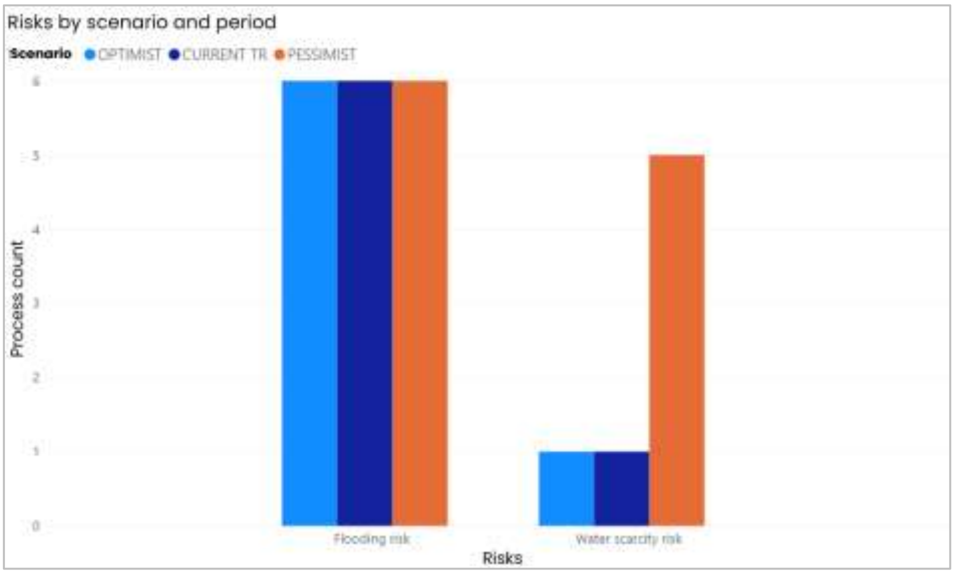
	4.3	Mechanical production equipment
	4.4	Electronic production equipment
	4.5	Cold production equipment
	4.6	Water supply equipment
	4.7	Water treatment equipment
	6.1	Fleet of conventional road vehicles
B	7.8	Equipment and machinery repair and installation suppliers
	9.1	Transport to the company - by road
	9.5	Transport to the company - by rail
	9.6	Transport from the company - by road
	9.10	Transport from the company - by rail
	9.11	Transport between company premises - by road
	10.1	Employee commutes: by road
	10.2	Employee commutes: providers of on-site transport services - by road
	10.3	Employee commutes: by rail
	10.4	Employee commutes: providers of on-site transport services - by rail
	11.1	Power supply - Mains electricity
	11.2	Power supply - Solar self-consumption
	12.1	Gas supply
	13.1	Water network - water quality
	13.2	Water network - quantity available
	13.3	Groundwater - water quality
	13.4	Groundwater - quantity available
	13.5	Surface water - water quality
	13.6	Surface water - quantity available
	13.7	Other water used (rain, sea, recycled water, etc.) - water quality
	13.8	Other water used (rain, sea, recycled water, etc.) - quantity available
	14.1	Availability and quality of telecommunications networks and internet

As is to be expected, when broken down to such a detailed level, the processes carried out at each plant and location appear as specific points with higher risks, although the overall risk of the plant remains low. This allows for much more effective decision-making and a more proactive approach to adaptive measures.

The risks that most affect the processes analysed are flooding and water scarcity as shown in the chart below, which reflects the number of processes with high or very high risk affected by each risk in the 2050 time horizon.



In fact, only the risks of flooding and water scarcity have plant processes at very high risk.



In the 2050 time horizon with pessimist scenario, less than 7% of the processes of the plants or locations have a high and very high risk.

The actions to adapt to the physical climate risks being assessed in the various locations are:

Climate change adaptation actions	
Financial adaptation actions	
AF1	The company/suppliers and/or Tier 1 customers have a dedicated treasury and financing plan to improve resilience to climate change threats.
AF2	The company/suppliers and/or Tier 1 customers have insurance to cover business interruption due to various sudden and/or periodic damage, interruption of resource supplies or services, or failures in transport infrastructure caused by climate change threats.
AF3	In its financial management, the company foresees additional costs arising from the interruption of supply of resources or services, due to various sudden and/or periodic damage caused to the facilities of its main Tier 1 suppliers or transport infrastructures caused by climate change threats.
AF4	The company conducts regular assessments of political and economic risks in the regions where it operates.
Human resources adaptation actions	
AH1	The company/suppliers and/or Tier 1 customers have established a policy for managing the working conditions of their employees and suppliers that takes into account climate hazards.
AH2	The company/suppliers and/or Tier 1 customers have flexible working policies, such as flexitime and work from home, to allow employees to adapt to adverse weather conditions or emergency situations without compromising business continuity.
AH3	The company/suppliers and/or Tier 1 customers provide health and wellness programmes, benefits and/or compensation to employees that address specific risks related to climate change. This includes managing heat stress, access to mental health services, first aid training, commuting subsidies during extreme weather events, support for medical care for health problems caused by climate threats, or similar actions.
AH4	The company/suppliers and/or Tier 1 customers carry out regular assessments of site-specific climate risks and their impact on the health and safety of employees.
AH5	The company/suppliers and/or Tier 1 customers provide regular safety and crisis management training so that employees are prepared to respond to emergency situations caused by extreme weather events.
AH6	The company has established a human resources management policy to ensure the availability of competent employees required for the activity in case transport is disrupted by climate threats.
Technical adaptation actions	
AT1	The company/suppliers and/or Tier 1 customers have developed a maintenance policy for their buildings, structures, critical equipment and/or facilities, which takes into account climatic hazards.
AT2	The site/suppliers and/or Tier 1 customers have implemented technical solutions to improve the adaptive capacity of their buildings, structures, critical equipment and/or facilities to climate change threats.
AT3	The site/suppliers and/or Tier 1 customers have implemented technical solutions to improve the adaptability of their working and production conditions to climate change threats.
AT4	The site/suppliers and/or Tier 1 customers have implemented technical solutions to improve the adaptive capacity of the natural and other assets necessary for their operations in the face of climate change threats.
AT5	The centre has measures in place to reduce its dependence on utilities in extreme weather events, such as gas and/or water tanks, electrical generators and/or emergency batteries, waste disposal alternatives, etc.
AT6	The centre has initiated a dialogue with its utility providers on the resilience and recovery times of its utilities to extreme weather events.
AT7	The company keeps spare parts and equipment in stock for critical components independently from the component suppliers.
AT8	The centre has continuity plans for all or most of its processes in case of extreme weather events.
AT9	There is an analysis of best technologies and sustainable practices to improve operational efficiency and that incorporate environmental, social and governance criteria in operations and decision making, in compliance with market expectations and as required by law.
Organisational adaptation actions	
AO1	The company ensures that its activities are not concentrated in a limited number of sites.
AO2	The company/suppliers and/or Tier 1 customers have put a resource sourcing and supply diversification policy in place taking into account their own and their suppliers' climate threats.
AO3	The company has established a policy of diversification of transport and routes, sales outlets and product stocks, taking into account climatic threats and the interests of its main suppliers and Tier 1 customers.
AO4	The company stays up to date with environmental and climate legislation and standards to ensure compliance and minimise legal risks, and with the latest research to take advantage of climate-inclusive consumer trends.
AO5	The company gives preference to suppliers and business partners that share its sustainability values.
AO6	Work is done to obtain recognised environmental certifications that support the sustainability of the company's products and processes.

These actions and those indicated below for transition risks demonstrate the Group's ability to adapt and therefore its resilience to the impacts and risks identified.

It should be noted that in recent years the sector has suffered a crisis with a drop in manufacturing volumes since 2019, for various reasons such as COVID-19 in 2020, the semiconductor crisis, logistics and supply chain problems, as well as the conflict between Ukraine and Russia.

However, in such a scenario, the Group's year-on-year results and track record are the best illustration of the resilient nature of CIE Automotive's model.

In the overall risk analysis, market risk is the greatest risk for the company, even though it is classified as medium/low. While there is an action plan for the various risks and the adaptability of the company, a description of the market risk and its action plan is shown below.

As stated in the document, market risk is affected by, and interacts with, other risks, such as product mix, margin, location and investment risk. Changes in the automotive market may lead to a shift in the product mix towards more climate-neutral solutions (e.g., electric vehicles). In this way, certain technologies could become a smaller proportion of sales, which may lead to increased competition for the remaining sales and thus to a reduction in volume or margins for certain products or technologies.

Plan for action and mitigating risks

It is still too early to say when the automotive sector will return to pre-pandemic levels of production and sales, especially in view of the various trends that have already been mentioned and that are introducing changes in the market at a very high speed. The company will reinforce its flexibility model to adapt to current or future customer needs and the latest trends.

The diversification of its product portfolio will make it more adaptive, which will set it apart from its competitors: a portfolio where more than 8 out of 10 products are independent of the vehicle's propulsion system and therefore not impacted by the electrification process of the sector. For the remaining components, work is being done from both a technological and market perspective to maximise the opportunities that are emerging in the areas of batteries, engines and power electronics or gearboxes.

With regard to the risk of products that have no clear substitute in zero-emission vehicles, CIE Automotive intends to increase its presence in products that make the greatest contribution to making vehicles lighter (forged chassis and suspension components), and in shafts and gears machining, and to be active in outsourcing traditional technologies that customers will outsource, to focus on new challenges such as connectivity, autonomous driving and offering in-vehicle software-based solutions. At the same time, it emphasises the innovation processes in these areas that, through their deployment in the coming years, will set the company apart from its competitors, to ensure that it is a winner in the process of taking advantage of the opportunity to consolidate the resulting market.

The move towards a more decarbonised economy will highlight the efforts that companies such as CIE Automotive have been making for years to introduce eco-design concepts from early stages of development and to pursue circularity in all of the company's processes. What does seem clear is that, in the medium term, automotive companies can emerge from the crisis stronger if they are able to adapt to the new scenario, which is likely to be characterised by the following factors, where CIE Automotive is already working:

- Reducing overcapacity in the sector.
- Mergers and acquisitions: fewer players, but larger, more diversified and more resilient to future crises.
- Strategic partnerships to streamline investments to adapt to changes in the sector.
- Increased financial control and discipline of companies.
- Eco-efficiency and circularity.
- A commitment to mitigating environmental impacts.

CIE Automotive's business model has already demonstrated its resilience and countercyclicality in various crises by combining geographic, commercial and technological diversity with a decentralised management model and strict financial discipline. Lastly, in the short term, the company's current focus is on guaranteeing the availability of raw materials. That is why it is strengthening its Global Management with Local Application (GLOCAL) purchasing model, along with one of the group's pillars, multi-location, so it will stay close to its manufacturers and not depend on global supply chains.

As mentioned above, the environmental management plan is coordinated and linked to the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The figures given are for the Strategic Plan as a whole and not just for one action or just for the environmental area.

The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget, with this not being material in the company's OpEx as shown in note 20 to the 2025 Consolidated Financial Statements. Therefore, it does not provide a breakdown by action, lever or line of work.

2.2.3 Management of impacts, risks and opportunities

2.2.3.1 DR related to ESRS 2 IRO-1: Description of the processes to identify and assess material climate-related impacts, risks and opportunities

ESRS 2 – IRO-1 – 20 a) AR 9 and 10	*The undertaking shall describe the process to identify and assess climate-related impacts, risks and opportunities. This description shall include its process in relation to: (a) impacts on climate change, in particular, the undertaking's GHG emissions (as required by Disclosure Requirement ESRS E1-6).*

Impacts, Risks and Opportunities (IROs)

+: positive impact // -: negative impact // R: risk // O: opportunity

Subtopics	IROs
Climate change adaptation	(-) Generation of greenhouse gas (GHG) emissions associated with energy-intensive
	(O) Financial impacts arising from: Accompanying the company's suppliers in the adoption of environmental management systems, which facilitates traceability and control of Environmental, Social and Governance (ESG) data in the upstream Value Chain.
Climate change mitigation	(+) Use of environmentally friendly materials such as green steel coils and recycled resins.
	(+ and O) Contributing to the decarbonisation of transport by building components for electric vehicles.
	(- and R) Generation of emissions linked to the company's data centres.
	(R) Financial impacts arising from: Refusal of car manufacturers (OEMs) to take on the extra cost of production with sustainable materials.
Energy	(+ and O) Reducing emissions of pollutants by self-generating green energy.

ESRS 2 – IRO-1 – 20 b) AR 13 and 14	*The undertaking shall describe the process to identify and assess climate-related impacts, risks and opportunities. This description shall include its process in relation to: (b) climate-related physical risks in own operations and along the upstream and downstream value chain, in particular: i. the identification of climate-related hazards, considering at least high emission climate scenarios; and ii. the assessment of how its assets and business activities may be exposed and are sensitive to these climate-related hazards, creating gross physical risks for the undertaking.*

The process for identifying and assessing climate-related and resilience impacts, risks and opportunities is included under *ESRS 2 – SBM-3- 19 a) and b).*

ESRS 2 – IRO-1 – 20 c) AR 13 and 14	*The undertaking shall describe the process to identify and assess climate-related impacts, risks and opportunities. This description shall include its process in relation to: (c) climate-related transition risks and opportunities in own operations and along the upstream and downstream value chain, in particular: i. the identification of climate-related transition events, considering at least a climate scenario in line with limiting global warming to 1.5°C with no or limited overshoot; and ii. the assessment of how its assets and business activities may be exposed to these climate-related transition events, creating gross transition risks or opportunities for the undertaking.*

The process for identifying and assessing climate-related and resilience impacts, risks and opportunities is included under *ESRS 2 – SBM-3- 19 a) and b).*

ESRS 2 – IRO-1 – 21 AR 13 and 14	*When disclosing the information required under paragraphs 20 (b)and 20 (c) the undertaking shall explain how it has used climate-related scenario analysis, including a range of climate scenarios, to inform the identification and assessment of physical risks and transition risks and opportunities over the short-, medium- and long-term.*

The analysis of climate-related scenarios, including a range of climate scenarios, to disclose the identification and assessment of physical and transitional risks and opportunities in the short, medium and long term is included under *ESRS 2 – SBM-3- 19 a) and b).*

2.2.3.2 DR E1-2: Policies related to climate change mitigation and adaptation

E1 – 2 - 24	*The disclosure required by paragraph 22 shall contain the information on the policies the undertaking has in place to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters.*

Title	**Environmental policy**
Description	CIE Automotive Group's environmental policy.
Objective	The purpose of this policy is to integrate environmental practices throughout the Value Chain. Doing this will contribute to achieving the United Nations Sustainable Development Goals (SDGs), and ensure transparency in the reporting on our environmental performance. The commitments in this policy are articulated as a key tool to achieve the group's goal of being a net zero emissions company by 2050 and the 1.5ºC target aligned with the Paris Agreement, in addition to its legal commitments and those of its stakeholders. As a leading global multi-technology supplier to the automotive industry, CIE Automotive has a clear commitment to sustainable development, the environment, biodiversity and the fight against climate change. We also recognise our responsibility to minimise the environmental impact of our activities, products and services, in line with the principles of sustainability and current legislation, our stakeholders' requirements and the voluntary commitments undertaken by the company. This commitment is reflected in our Environmental Policy, which guides our strategic and operational decisions towards a more sustainable business model.
Material Impacts, Risks and Opportunities	As part of the continuous reviews of the Strategic Plan, the Management Plan and the potential Transition Plan, the dependencies, impacts, risks and opportunities are assessed to ensure that the risks are mitigated and the opportunities are taken advantage of. For the environmental risks, at minimum, any acute physical, chronic physical and transitional climate risks will be addressed and risk analyses of pollution, circularity, water and biodiversity will be launched. The risk map is integrated into CIE Automotive's Risk Management System (RMS), which follows the ISO 31000 methodology and provides reasonable assurance that all significant environmental risks are prevented, identified, assessed and monitored on an ongoing basis. These risks are approved by the Board and managed according to risk tolerance levels. The Environmental Policy forms part of the company's governance process, along with the dual materiality analysis and the IROs identified in it. The policy therefore addresses the material IROs from this analysis.
Scope of the policy	The scope of this policy covers all of CIE Automotive's subsidiaries and affiliates where the company exercises financial and operational control. There are no geographical or technological exclusions. This policy has also been established to allow monitoring of the supply chain, to ensure that all its participants have commitments in line with those of the company; and to manage information security when the products sold are being developed and manufactured.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	This policy applies globally.
Value Chain	The policy includes a commitment to promote and require environmental commitments in line with those of the company throughout the Value Chain.

Body responsible for implementation	CIE Automotive's Board, through its Audit Committee, is ultimately responsible for the existence and application of this policy. The ESG Committee will oversee the implementation of this policy and ensure it is aligned with the strategic and regulatory goals, with the support of the CEO, who in turn will be supported by the corporate Engineering, Quality and Environment Department and the Horizontal ESG Committee.
Publication	Public document posted on the corporate website and on the Group's intranet.

ESRS E1-3-28 stresses the importance of implementing integrated management systems, and more specifically for them to include environmental management systems (EMS) and how to ensure their effectiveness and continuous improvement. At this point it should be emphasised that these ISO 14001 based systems ensure a Value Chain and stakeholder focus with key points of the Value Chain being ensured via internal audits and third-party audits.

Some of these key points of the EMS, where the Environmental Policy is a key point and focus of this audit and review process, are:

1. Organisational context and stakeholder analysis
The standard states that the organisation must:
- Identify relevant stakeholders (customers, suppliers, contractors, regulators, community, etc.) and understand their needs and expectations related to environmental performance.
- Incorporate these expectations into the environmental management system, to ensure that stakeholders' concerns are taken into account.

2. Value chain management
The ISO 14001 standard includes a clear focus on the value chain, ensuring that environmental impacts are not just limited to internal operations, but are considered at all stages, such as:
- Supply of raw materials: Promote purchases of materials from suppliers that comply with environmental requirements.
- Design of products and services: Promote a life-cycle approach, considering environmental impacts from the extraction of raw materials to the end of the product's useful life.
- Management of suppliers and contractors: The standard requires organisations to establish environmental requirements for their suppliers and subcontractors. This may include contractual clauses, audits and training programmes.

3. Product life cycle (life cycle approach)
The ISO 14001 standard incorporates the concept of "life cycle", which means that organisations must assess and minimise environmental impacts at all stages of their value chain:
- Extraction of raw materials.
- Production/distribution.
- Product use.
- Final disposal or recycling.

This obliges the organisation to work closely with its partners in its value chain to identify and manage environmental impacts at each stage.

4. Communication with stakeholders
The standard promotes effective communication with internal and external stakeholders to:
- Report on environmental performance and risk management.
- Encourage collaboration with partners, suppliers and customers on environmental initiatives.
- Strengthen transparency and trust with the community and other stakeholders.

E1 – 2 – 25 *AR 16 and 18*	*The undertaking shall indicate whether and how its policies address the following areas: (a) climate change mitigation; (b) climate change adaptation; (c) energy efficiency; (d) renewable energy deployment; and (e) other.*

CIE Automotive's environmental policy addresses the following areas:

- Climate change mitigation.
- Climate change adaptation.
- Energy efficiency.
- Renewable energy deployment.
- Design of Sustainable products and processes under Eco-design concepts.
- Protection of biodiversity and responsible use of water resources.
- Preservation of air, soil and water quality.
- Mandatory and voluntary compliance.
- Human engagement.
- Prevention and management of accidents and emergency situations.
- Transparency.

To achieve this, targets are set, measured and corrected through action plans and mitigation plans.

2.2.3.3 DR E1-3: Actions and resources in relation to climate change policies

E1 – 3 – 28 *AR 16 and 18*	*In addition to ESRS 2 MDR-A, the undertaking shall: The description of the actions and resources related to climate change mitigation and adaptation shall follow the principles stated in ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.*

Action	**Substitution of non-renewable fuels**
Results	Scope 1 emission reductions, within the lines of the Climate Change Adaptation and Mitigation and energy subtopics.
Scope	A guide of recommendations was launched for implementation in the group's plants including this action, getting the Value Chain involved.
Horizon	The short-term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Since 2021, a reduction of 11.58% reduction in Scope 1 emissions. The furnace project was launched to lead the transition in these critical assets.
Information	Natural gas-based furnaces are one of the critical assets and their decarbonisation is a technical/economic barrier for the whole industry.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Purchase of renewable electricity**
Results	Scope 2 emission reductions, within the lines of the Climate Change Adaptation and Mitigation and energy subtopics.
Scope	A guide of recommendations was launched for implementation in the group's plants including this action, getting the Value Chain involved.
Horizon	The short-term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Since 2021, a reduction of 34.82% percent reduction in Scope 2 emissions. The opportunity and cost of introducing higher renewable electricity content in an increasing number of countries is being piloted on a recurring basis.
Information	The availability and cost of renewable electricity does not follow the same timing in all geographic locations.
Description of associated CapEx and OpEx	No specific CapEx required.

Action	**Energy efficiency through Industry 4.0 initiatives**
Results	Scope 1 and 2 emission reductions, within the lines of the Climate Change Adaptation and Mitigation and energy subtopics.
Scope	A guide of recommendations was launched for implementation in the group's plants including this action, getting the Value Chain involved.
Horizon	The short-term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Since 2021, a reduction of 29.68% reduction in Scope 1 and 2 emissions. The engineering department is piloting compliance with this action.
Information	The KPI associated with this action was successfully completed in 2025.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Reduction of gross-weight-to-net-weight ratio**
Results	Scope 1, 2 and 3 emission reductions, within the lines of the Climate Change Adaptation and Mitigation and energy subtopics.
Scope	A guide of recommendations was launched for implementation in the group's plants including this action, getting the Value Chain involved.
Horizon	The short-term horizon is set for 2025, the medium term for 2033 and the long term for 2050
Actions	Since 2021, a reduction of 29.68% reduction in Scope 1 and 2 emissions. The engineering department is piloting compliance with this action.
Information	The KPI associated with this action was successfully completed in 2025.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area.

	The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Circularity projects**
Results	Reduction of scope 3 emissions, with an impact on the generation of greenhouse gas emissions associated with energy-intensive material production processes, thereby contributing to climate change adaptation and the use of environmentally friendly materials as part of the company's climate change mitigation efforts.
Scope	A guide of recommendations was launched for implementation in the group's plants including this action, getting the Value Chain involved.
Horizon	The short-term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Since 2021, a reduction of 11.85% reduction in Scope 3 emissions. The engineering department is piloting compliance with this action.
Information	The KPI associated with this action has been successfully completed in 2025.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Adaptation of the Azkoitia landfill site to current legislation**
Results	Mitigation of climate risks.
Scope	Azkoitia inert waste landfill.
Horizon	Short term.
Actions	Since 2022, a stabilisation and adaptation plan were launched for the installation to avoid environmental risks and to adapt it to the new legislation.
Information	Although it is a discontinued activity, mitigating any environmental risk is one of the Group's priorities.
Description of associated CapEx and OpEx	No specific CapEx required.

Action	Calculation of the carbon footprint of key products
Results	Identification of levers and barriers, along the lines of the Climate Change Adaptation and Mitigation subtopics.
Scope	Key products due to their impact on the group, including sunroofs, getting the Value Chain involved.
Horizon	Short term.
Actions	Calculating the products' footprint makes it possible to identify the key emission factors linked to them from a product/process point of view.
Information	Based on the results of this analysis, actions are taken at product level to reduce the impact. In addition, the work can be done with the Value Chain, from customers to suppliers, to align the efforts
Description of associated CapEx and OpEx	No specific CapEx required. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	Digitisation of environmental data management
Results	Identification of key factors and tracking, along the lines of the Climate Change Adaptation and Mitigation subtopics.
Scope	The entire CIE Automotive Group, getting its whole value chain involved.
Horizon	Short term.
Actions	In 2024, a project was launched for the collection and management of environmental data.
Information	Proper data management is essential for effective action and tracking to be able to react to irregularities. This must also be adapted to the latest requirements of all the company's stakeholders.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	***Supply Chain Race2Zero* project**
Results	Adaptation and mitigation of climate change in the Value Chain, within the lines of the Climate Change Adaptation and Mitigation group, in clear alignment with accompanying the company's suppliers in the adoption of environmental management systems, which facilitates traceability and control of ESG data in the upstream Value Chain.
Scope	Key suppliers to CIE Automotive.
Horizon	The short-term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	This project was launched in 2022 and aims to align the objectives and actions of the value chain with those of CIE Automotive and, in turn, with those of its stakeholders.

Information	Scope 3 accounts for the largest percentage of the Group's emissions, with category 1 having the greatest impact, which is why suppliers are key to aligning the entire value chain.
Description of associated CapEx and OpEx	No specific CapEx required. The OpEx is mainly linked to the group's R&D activities and was incorporated into its strategic lines and therefore into the recurrent R&D budget, together with the efforts of the purchasing division. As mentioned in Note 20 to the 2025 Consolidated Financial Statements, the OPEX associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Materials project**
Results	Adaptation and mitigation of climate risks in the use of materials.
Scope	Key materials consumed throughout the Group, getting the Value Chain involved.
Horizon	The short-term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Materials are the group with the greatest impact on CIE Automotive's emissions. This project aims, in combination with the *Supply Chain Race2Zero* project, to significantly reduce Scope 3 emissions.
Information	The materials should be analysed from the point of view of sustainability and functionality, especially where they have high mechanical or aesthetic requirements.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Optional equipment project**
Results	Climate Change Adaptation and Mitigation subtopics.
Scope	A guide of recommendations was launched for implementation in the group's plants including this action, getting the Value Chain involved.
Horizon	The short-term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Since 2021, a reduction of 29.68% reduction in Scope 1 and 2 emissions. Improving optional equipment such as compressors and waste heat recovery systems helps reduce energy consumption.
Information	For years, recurring studies have been carried out on the main optional equipment of each plant to see if it is possible to improve its efficiency.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already called for EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company.

	Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Eco-design**
Results	Climate change adaptation and mitigation subtopics.
Scope	Eco-design criteria were incorporated into process 3 of CIE Automotive's management model, which affects all the Group's plants and involves the entire value chain.
Horizon	The short-term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Eco-design criteria were incorporated during the product and process development process. Eco-design manuals have also been implemented to take advantage of opportunities to reduce environmental impact throughout the development chain.
Information	Considering eco-design factors at the earliest stages of project definition makes this option more feasible.
Description of associated CapEx and OpEx	No specific CapEx required. This plan incorporates the environmental actions discussed above. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

One of the foundations of the integrated management system is to close the circle of strategy, policies, actions and objectives or goals by ensuring the processes and actions are effective. To this end, actions are linked to targets or objectives that are continuously reviewed as metrics of the effectiveness of each action and of the system.

It should be recalled that one of the pillars of environmental management systems certified with the ISO 14001 standard is the Plan-Do-Check-Act (PDCA) cycle approach, which ensures continuous improvement:

- **Plan:** Identify environmental aspects, legal requirements and risks/opportunities; define environmental objectives and targets; and establish action plans.
- **Do:** Implement the plans and procedures designed.
- **Check:** Monitor, measure, analyse and evaluate environmental performance against the established objectives.
- **Act:** Correct and adjust the system as necessary to improve its effectiveness.

This pillar is combined with two other key pillars:

Monitor, measure and assess performance

- The standard requires organisations to continuously monitor their environmental performance, assessing whether the objectives and targets are being met.
- Internal audits are a key tool to verify the effectiveness of the system. In the case of CIE Automotive, these are corroborated by third-party certification.

Continuous improvement

The standard encourages continual improvement through periodic reviews of the system, identification of non-conformities and implementation of corrective and preventive actions. This allows the system to constantly progress and become more effective in achieving its goals.

For this purpose, a matrix has been set up to ensure that all the actions are linked to objectives or goals. This matrix is shown in the table below.

		Obj1	Obj2	Obj3	Obj4	Obj5	Obj6	Obj7	Obj8	Obj9	Obj10	Obj11	Obj12	Obj13
		Energy consumption intensity reduction	Direct GHG emissions reduction (Scope 1)	Indirect GHG emissions reduction (Scope 2)	Direct and indirect GHG emissions intensity reduction (Scope 1 and 2)	Reduction of total non-recycled waste generated	Reduction of water extraction intensity	General Net Zero target	Short-medium term reduction targets for Scope 1+2	Short-medium term reduction target for Scope 3	Improvement of gross weight-net weight ratio	Industry 4.0 initiatives	Circularity projects	ISO 14001 certification
Acc1	Non-renewable fuel substitution	x	x	x*	x			x	x	x				x
Acc2	Purchase of renewable electricity			x	x		x*							
Acc3	Energy efficiency via Industry 4.0 initiatives	x	x	x	x	x		x	x	x*		x		x
Acc4	Reduction of gross weight-net weight ratio	x	x	x	x	x	x*	x	x	x	x	x		
Acc5	Circularity projects	x*	x*	x*	x*	x*		x	x*	x			x	x
Acc6	Adaptation of Azkoitia landfill to current legislation													x
Acc7	Key product carbon footprint calculation	x	x	x	x	x	x	x	x	x	x		x	
Acc8	Environmental data management digitization	x	x	x	x	x	x	x	x	x	x	x	x	x
Acc9	Supply Chain Race2Zero project	x*	x*	x*	x*	x*	x*	x	x*	x	x*	x*	x*	x*
Acc10	"Materials" project	x*	x*	x*	x*	x*	x*	x	x*	x	x*	x*	x*	x*
Acc11	Auxiliary equipment project	x	x	x	x		x*	x*	x	x*		x*		x*
Acc12	Eco-design	x	x	x	x	x	x	x	x	x	x	x	x	x

The entries identified with an asterisk (*) are those that are mainly involved in the Value Chain.

The following table reflects the alignment of the actions and sub-themes of the Impact, Risk and Opportunity (IRO) analysis, as well as in the answers to *indicator E1-4-32*, through the objectives they pursue.

	E1		
	Adaptation	Mitigation	Energy
Reduction of energy consumption intensity	x	x	x
Reduction of direct GHG emissions (Scope 1)	x	x	x
Reduction of indirect GHG emissions (scope 2)	x	x	x
Reduction of direct and indirect GHG emissions intensity (scope 1+ 2)	x	x	x
Reduction of the total amount of waste generated and not recycled	x		
Reduce water withdrawal intensity	x		
Overall Net-Zero target	x		
Short-medium term reduction targets scope 1 + 2	x		
Short-medium term targets for scope 3 reductions	x		

E1 – 3 – 29 a)	*In addition to ESRS 2 MDR-A, the undertaking shall: (a) when listing key actions taken in the reporting year and planned for the future, present the climate change mitigation actions by decarbonisation lever including the nature- based solutions.*

The key actions being implemented are designed to directly and interdependently address the levers and forces identified under *E1 – 1 – 16 b)*. These are all aligned and managed through the Environmental Management Plan, structured as a transition plan. These actions include:

- Adopting sustainable technologies:
    - Reducing consumption of energy and raw materials.
    - Replacing natural gas from non-renewable sources with alternative sources.
    - Using reused materials or materials from recycling processes.
- Collaboration and mentoring initiatives: The *Supply Chain Race2Zero* project, focused on the alignment and sustainable improvement of the Value Chain.
- Digitisation of environmental management: Automating and improving environmental data management, integrating the connection with the links in the Value Chain.
- Analysis of the carbon footprint of products: Identifying opportunities to reduce environmental impacts through highly effective actions.
- Action plan for decarbonisation: Implementation of a detailed roadmap of measures to be rolled out until the target date of 2033.
- CIE Automotive's Strategic Plan: Reinforcement of the strategic pillars for adapting the group's products and technologies, through its 8 basic lines of action.

These measures reflect a comprehensive approach aligned with sustainability requirements, geared towards the ecological transition and reaching the strategic targets set.

E1 – 3 – 29 b)	*In addition to ESRS 2 MDR-A, the undertaking shall: (b) when describing the outcome of the actions for climate change mitigation, include the achieved and expected GHG emission reductions.*

Each of the actions mentioned under *E1-3-28* specifies the scope it will have an impact on, as well as the timeframe in which the action will materialise.

In the short term, aligned with the ongoing 2025 Strategic Plan period, all targets related to GHG reduction and energy—closely interconnected-are being met. The following graph illustrates the progress made toward the total commitments for the 2021-2025 period in relation to the key targets in this area. It is important to note that 2021 serves as the baseline year for our targets. It should be noted that the base year for our targets is 2021.

In the summary graph, on the left is the definition of the indicator or KPI with its units, followed by the value of the average annual target. Below, the reduction already achieved from 2021 to 2025 and the committed value for the whole period.

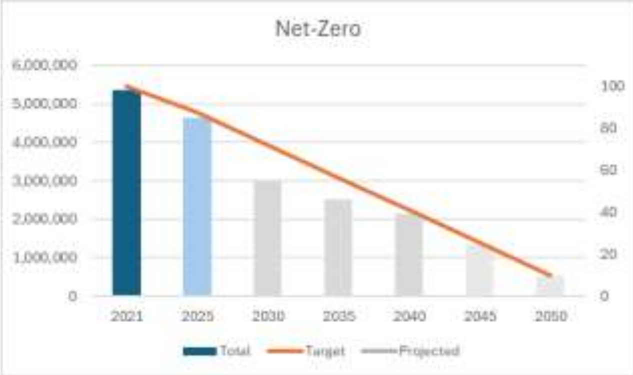
In the short and medium term, the target already validated by SBTi (Science Based Target initiative), is a reduction based on the year 2021 and target date 2033. The blue trend line shows a linear decrease year by year until the target is achieved, and the bars show the emission values for each year, with the values up to 2025 being actual values and from 2025 to 2033 extrapolations of trends according to the introduction of the actions, levers and projects mentioned in this report. This is shown in the graph below, in which the above information is shown for the scope 1 plus scope 2 target.

Primary axis in tonCO2e and secondary axis in %.

Similarly, the graph below shows the above information for Scope 3. At this point it should be recalled that the availability of materials of recycled or secondary origin, where renewable energies have been used in their manufacture, is not expected to be available until after 2028 with partial introduction from 2025 to 2028. Further acceleration in the electrification of vehicles is also expected in the coming years with a significant impact on in-use emissions.

Primary axis in tonCO2e and secondary axis in %.

Finally, the last graph in this section shows the aforementioned information for the 'net-zero' target. In this case, the target date is 2050 and the reasoning for the evolution of emissions is largely conditioned, especially in the early years, by the afore mentioned evolution of Scope 3 emissions, since these account for most of the total emissions.



Primary axis in tonCO2e and secondary axis in %.

E1 – 3 – 29 c) i AR 20	*In addition to ESRS 2 MDR-A, the undertaking shall: (c) relate significant monetary amounts of CapEx and OpEx required to implement the actions taken or planned to: i. the relevant line items or notes in the financial statements.*

As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The figures given are for the Strategic Plan as a whole, not just for one action or just for the environmental area.

The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company, making a more detailed breakdown unnecessary.

Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established

E1 – 3 – 29 c) ii AR 22	*In addition to ESRS 2 MDR-A, the undertaking shall: (c) relate significant monetary amounts of CapEx and OpEx required to implement the actions taken or planned to: ii. the key performance indicators required under Commission Delegated Regulation (EU) 2021/2178.*

As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The figures given are for the Strategic Plan as a whole, not just for one action or just for the environmental area.

The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company and does not need to be broken down in further detail.

Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

E1 – 3 – 29 c) iii AR 20	*In addition to ESRS 2 MDR-A, the undertaking shall: (c) relate significant monetary amounts of CapEx and OpEx required to implement the actions taken or planned to: iii. if applicable, the CapEx plan required by Commission Delegated Regulation (EU) 2021/2178.*

As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The figures given are for the Strategic Plan as a whole, not just for one action or just for the environmental area.

The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company, making a more detailed breakdown unnecessary.

Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

2.2.4 Metrics and targets

2.2.4.1 DR E1-4: Targets related to climate change mitigation and adaptation

E1 – 4 – 32	*The disclosure of the targets required in paragraph 30 shall contain the information required in ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets.*

Objective	**Reduce intensity of energy consumption**
Description	The aim is to make more efficient use of the energy resources consumed by the company as set out in the environmental policy.
Target level	Intensity target for sales. This is calculated by dividing the company's energy consumption by its annual sales.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	The reduction compared to 2021 was 18.71%, meaning that the target was successfully achieved.

Objective	**Reduction of direct (Scope 1) GHG emissions**
Description	Reflects the company's commitment to reducing emissions from the direct use of non-renewable fuels
Target level	Absolute objective. This is calculated as the sum of all the company's Scope 1 emissions in the year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.

Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	The reduction compared to 2021 was 11.58%, meaning that the target was successfully achieved.

Objective	**Reduction of indirect (Scope 2) GHG emissions**
Description	Reflects the company's commitment to reducing emissions from indirect use of non-renewable energies.
Target level	Absolute objective. This is calculated as the sum of all the company's Scope 2 emissions in the year.
Scope	The entire Group, getting its whole value chain involved
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	The reduction compared to 2021 was 34.82%, meaning that the target was successfully achieved.

Objective	**Reduction of intensity of direct and indirect (Scopes 1+2) GHG emissions**
Description	Reflects the company's commitment to reducing emissions from direct and indirect use of non-renewable energies.
Target level	Intensity target for sales. This is calculated by dividing the company's total Scope 1 and Scope 2 emissions from the year by its sales in the year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	It is evolving positively, as the reduction compared to 2021 has been 29.68%, meaning that the target has been satisfactorily achieved.

Objective	**Decrease the total amount of waste generated and not recycled**
Description	Reflects the company's commitment to reducing the impact of waste generated.
Target level	Absolute objective. Total weight of waste not sent for recycling or reuse in a year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aimed at reducing Scope 3 emissions.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	The disruption of the supply chain in the field of foundry sand recycling has led to an increase in the generation of non-recyclable waste. As it has not been possible to rebuild this supply chain, the target set has not been achieved, with an improvement of only 0.14% compared to the 2021 values.

Objective	**Reduce the intensity of water abstraction**
Description	Reflects the company's commitment to reducing water consumption.
Target level	Intensity target for sales. The total volume of water extracted by the company in a year divided by its sales in that year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Focuses on reducing and mitigating one of the risks identified in the company's IRO analysis.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	Due to increased production and production requirements in Asian plants, the established target has not been met by a narrow margin, with a reduction of 7.21% compared to 2021. Efforts in this area will be stepped up to redirect and improve results.

Objective	**Overall Net-Zero target**
Description	Meet the net-zero target for greenhouse gas emissions across the Value Chain by 2050.
Target level	Absolute target, in line with SBTi requirements, to achieve Net-Zero throughout the company by 2050 at the latest.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2050
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement and the net-zero strategy
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	No significant variations.
Performance	Most of the reduction is expected from 2030 onwards when the use phase will be decarbonised, and lower emitting materials will become competitively available in all regions

Objective	**Short/medium-term range reduction of scopes 1 + 2**
Description	Short- to medium-term targets: to reduce its absolute Scope 1 and 2 GHG emissions by 57.9% by 2033 from base year 2021.
Target level	Absolute objective. Calculated as the sum of Scope 1 and Scope 2 emissions according to the GHG protocol.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2033
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	No significant variations.
Performance	It is evolving positively as the reduction compared to 2021 has been 29.68%.

Objective	**Short/medium-term range reduction of scope 3**
Description	Short- to medium-term objectives: CIE Automotive is committed to reducing its absolute Scope 3 GHG emissions by 54.6% by 2033 from 2021 as a base year.
Target level	Absolute objective. Calculated as total Scope 3 emissions according to the GHG protocol.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2033
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.

Geographical regions	The whole Group.
Variations	No significant variations.
Performance	Scope 3 depends heavily on the sector's electrification ratio. This point is up to our customers and is currently influenced by various drivers that can either accelerate or slow down the pace of electrification.

The alignment of the targets and sub-topics of the Impacts, Risks and Opportunities (IROs) analysis is shown below:

	E1		
	Adaptation	Mitigation	Energy
Reduce intensity of energy consumption	x	x	x
Reduction of direct (Scope 1) GHG emissions	x	x	x
Reduction of indirect (Scope 2) GHG emissions	x	x	x
Reduction of intensity of direct and indirect (Scopes 1+2) GHG emissions	x	x	x
Decrease the total amount of waste generated and not recycled	x		
Reduce the intensity of water abstraction	x		
Overall Net-Zero target	x		
Short/medium-term range reduction of scopes 1 + 2	x		
Short/medium-term range reduction of scope 3	x		

E1 – 4 – 33 AR 27 and 29	*For the disclosure required by paragraph 30, the undertaking shall disclose whether and how it has set GHG emissions reduction targets and/or any other targets to manage material climate-related impacts, risks and opportunities, for example, renewable energy deployment, energy efficiency, climate change adaptation, and physical or transition risk mitigation.*

Various GHG emission reduction targets are set out above under *E1-4-32*. In addition, the Group's guidelines for recommendations include buying renewable electricity in locations and markets where this is possible.

E1 – 4 – 34 a) AR 23, 24, 27, 29 and 31	*If the undertaking has set GHG emission reduction targets, ESRS 2 MDR-T and the following requirements shall apply: (a) GHG emission reduction targets shall be disclosed in absolute value (either in tonnes of CO2eq or as a percentage of the emissions of a base year) and, where relevant, in intensity value.*

This information is included above under *E1-4-32*.

E1 – 4 – 34 b)	*If the undertaking has set GHG emission reduction targets, ESRS 2 MDR-T and the following requirements shall apply:* ***(b) GHG emission reduction targets shall be disclosed for Scope 1, 2 and 3 GHG emissions, either separately or combined. The undertaking shall specify, in case of combined GHG emission reduction targets, which GHG emission Scopes (1, 2 and/or 3) are covered by the target, the share related to each respective GHG emission Scope and which GHGs are covered. The undertaking shall explain how the consistency of these targets with its GHG inventory boundaries is ensured (as required by Disclosure Requirement E1-6). The GHG emission reduction targets shall be gross targets, meaning that the undertaking shall not include GHG removals, carbon credits or avoided emissions as a means of achieving the GHG emission reduction targets.***

This information is included above under *E1-4-32*.

E1 – 4 – 34 c)	*If the undertaking has set GHG emission reduction targets, ESRS 2 MDR-T and the following requirements shall apply;* ***(c) the undertaking shall disclose its current base year and baseline value, and from 2030 onwards, update the base year for its GHG emission reduction targets after every five-year period thereafter. The undertaking may disclose the past progress made in meeting its targets before its current base year provided that this information is consistent with the requirements of this Standard.***

This information is included above under *E1-4-32*.

E1 – 4 – 34 e) *AR 26*	*If the undertaking has set GHG emission reduction targets, ESRS 2 MDR-T and the following requirements shall apply;* ***(e) The undertaking shall state whether the GHG emission reduction targets are science- based and compatible with limiting global warming to 1.5ºC. The undertaking shall state which framework and methodology has been used to determine these targets including whether they are derived using a sectoral decarbonisation pathway and what the underlying climate and policy scenarios are and whether the targets have been externally assured. As part of the critical assumptions for setting GHG emission reduction targets, the undertaking shall briefly explain how it has considered future developments (e.g., changes in sales volumes, shifts in customer preferences and demand, regulatory factors, and new technologies) and how these will potentially impact both its GHG emissions and emissions reductions.***

This information is included above under *E1-4-32*.

E1 – 4 – 34 f) *AR 30*	*If the undertaking has set GHG emission reduction targets, ESRS 2 MDR-T and the following requirements shall apply****; f) The undertaking shall describe the expected decarbonisation levers and their overall quantitative contributions to achieve the GHG emission reduction targets (e.g., energy or material efficiency and consumption reduction, fuel switching, use of renewable energy, phase out or substitution of product and process).***

This information is included under *E1 – 1 – 16 b), E1 – 1 – 16 c) and E1 – 3 – 29 a).*

2.2.4.2 DR E1-5: Energy consumption and mix

Due to the incorporation of the CIE Metal Norte, CIE Engrecon and CIE Autometal Piracicaba plants, the reporting scope of these indicators has increased.

E1 – 5 – 37 a) *AR 32 and 33*	*The disclosure required by paragraph 35 shall include the total energy consumption in MWh related to own operations disaggregated by:* ***(a) Total energy consumption from fossil sources***

2025: 782,633.47 (2024: 841,434.08 MWh)

E1 – 5 – 37 b) *AR 32 and 33*	*The disclosure required by paragraph 35 shall include the total energy consumption in MWh related to own operations disaggregated by:* ***(b) Total energy consumption from nuclear sources.***

2025: 44,050.67 MWh (2024: 44,003.04 MWh)

E1 – 5 – 37 c) *AR 32 and 33*	*The disclosure required by paragraph 35 shall include the total energy consumption in MWh related to own operations disaggregated by:* ***(c) Total energy consumption from renewable sources.***

2025: 662,217.34 MWh (2024: 646,541.22). The data reported for 2024 is not consistent with that reported in the previous financial year because findings have been made regarding electricity consumption at some plants and more than was actually consumed was reported.

E1 – 5 – 37 c) i *AR 32 and 33*	*The disclosure required by paragraph 35 shall include the total energy consumption in MWh related to own operations disaggregated by:* ***(c)*** ***Total energy consumption from renewable sources disaggregated by:*** ***i. Fuel consumption for renewable sources including biomass (also comprising industrial and municipal waste of biologic origin), biofuels, biogas, hydrogen from renewable sources, etc.***

2025: 4,732.88 MWh (2024: 5,376.98 MWh)

E1 – 5 – 37 c) ii *AR 32 and 33*	*The disclosure required by paragraph 35 shall include the total energy consumption in MWh related to own operations disaggregated by:* ***(c)*** ***Total energy consumption from renewable sources disaggregated by:*** ***ii. Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources.***

2025: 654,060.68 (2024: 637,752.02 MWh). The data reported for 2024 is not consistent with that reported in the previous financial year because findings have been made regarding electricity consumption at some plants and more than was actually consumed was reported.

E1 – 5 – 37 c) iii *AR 32 and 33*	*The disclosure required by paragraph 35 shall include the total energy consumption in MWh related to own operations disaggregated by:* ***(c)*** ***Total energy consumption from renewable sources disaggregated by:*** ***iii. Consumption of self-generated non-fuel renewable energy.***

2025: 3,423.78 MWh (2024: 3,422.22 MWh)

E1 – 5 – 38 a) *AR 33*	*The undertaking with operations in high climate impact sectors shall further disaggregate their total energy consumption from fossil sources by:* ***(a) Fuel consumption from coal and coal products.***

2025: 0MWh (2024: 1,493.57 MWh)

E1 – 5 – 38 b) *AR 33*	*The undertaking with perations in high climate impact sectors shall further disaggregate their total energy consumption from fossil sources by:* ***b) Fuel consumption from crude oil and petroleum products.***

2025: 100,679.43 (2024: 86,592.94 MWh). The data reported for 2024 is not consistent with that reported in the previous financial year because findings have been made regarding fuel consumption at some plants and more than was actually consumed was reported.

E1 – 5 – 38 c) *AR 33*	*The company with operations in high climate impact sectors will further disaggregate its total energy consumption from fossil sources by:* ***c) Fuel consumption from natural gas.***

2025: 364,194.20 MWh (2024: 350,821.87 MWh). The data reported for 2024 is not consistent with that reported in the previous financial year because findings have been made regarding fuel consumption at some plants and more than was actually consumed was reported.

E1 – 5 – 38 d) *AR 33*	*The undertaking with operations in high climate impact sectors shall further disaggregate their total energy consumption from fossil sources by:* ***d) Fuel consumption from other fossil sources.***

2025: 0 MWh (2024: 0 MWh)

E1 – 5 – 38 e) *AR 33*	*The undertaking with operations in high climate impact sectors shall further disaggregate their total energy consumption from fossil sources by:* ***e) consumption of electricity, heat, steam and refrigeration purchased or procured from fossil sources.***

2025: 317,759.84 MWh (2024: 339,224.29 MWh). The data reported for 2024 is not consistent with that reported in the previous financial year because findings have been made regarding electricity consumption at some plants and more than was actually consumed was reported.

E1 – 5 – 39	*Where applicable, the undertaking shall disaggregate and disclose separately its non-renewable energy production and renewable energy production in MWh.*

Energy production (MWh)	2025	2024
Non-renewable	0	0
Renewable	3,423.78	3,422.22

E1 – 5 – 40 AR 36	*The undertaking shall provide information on the energy intensity (total energy consumption per net revenue) associated with activities in high climate impact sectors.*

2025: 0.41 MWh/K€ (2023: 0.43 MWh/k€)

E1 – 5 – 41	*The disclosure on energy intensity required by paragraph 40 shall only be derived from the total energy consumption and net revenue from activities in high climate impact sectors.*

CIE Automotive confirms that the energy intensity required by paragraph 40 is only derived from the total energy consumption and net revenue from activities in high climate impact sectors.

E1 – 5 – 42	*The undertaking shall specify the high climate impact sectors that are used to determine the energy intensity required by paragraph 40.*

Due to CIE Automotive's business model, all of its activities fall within high climate impact sectors.

E1 – 5 – 43 AR 38	*The undertaking shall disclose the reconciliation to the relevant line item or notes in the financial statements of the net revenue amount from activities in high climate impact sectors (the denominator in the calculation of the energy intensity required by paragraph 40).*

Due to CIE Automotive's business model, all of its activities fall within high climate impact sectors.

2.2.4.3 DR E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions

E1 – 6 – 44 AR 39, 40 and 48	*The undertaking shall disclose in metric tonnes of CO2eq its: (a) gross Scope 1 GHG emissions; (b) gross Scope 2 GHG emissions; (c) gross Scope 3 GHG emissions; and (d) total GHG emissions.*

The data reported for 2024 is not consistent with that reported in the previous financial year because findings have been made regarding fuel and electricity consumption at some plants and more than was actually consumed was reported. A different emission factor has also been used for electricity in India in accordance with legal requirements.

	Retrospective							
	Base year (2021)	Comparative (2024)	N (2025)	%N/N-1 25vs24	2025	2030	2033	(2050)
Scope 1 GHG emissions								
Gross Scope 1 GHG emissions (tCO2eq)	107,775.62	91,257.61	95,298.27	+4.43%	-8.24%	NA*	-57.87% *	-
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0	0	0	0	0%	0%	0%	0%
Scope 2 GHG emissions								
Gross location-based Scope 2 GHG emissions (tCO2eq)	518,131.96	435,230.70	438,262.93	+0.70%	-	NA*	-	-
Gross market-based Scope 2 GHG emissions (tCO2eq)	378,791.33	235,058.13	246,878.27	5.03%	-21.55%	NA*	-57.87%*	-

Significant Scope 3 GHG emissions								
Total Gross indirect (Scope 3) GHG emissions (tCO2eq)	4,886,223.99	5,424,349.17	4,307,085.96	-20.60%	-	NA*	-54.60%	-
1. Purchased goods and services	3,520,028.82	3,790,566.79	3,113,489.45	-17.86%	-	NA*	-	-
2. Capital goods	-	-	-	-	-	NA*	-	-
3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)	61,188.89	66,461.55	69,171.67	+4.08%	-	NA*	-	-
4. Upstream transportation and distribution	32,375.70	39,801.10	40,576.10	1.95%	-	NA*	-	-
5. Waste generated in operations	32,419.03	29,280.23	35,570.82	21.48%	-	NA*	-	-
6. Business traveling	-	-	-	-	-	NA*	-	-
7. Employee commuting	-	-	-	-	-	NA*	-	-
8. Upstream leased assets	-	-	-	-	-	NA*	-	-
9. Downstream transportation	37,108.23	50,126.43	36,609.30	-26.97%	-	NA*	-	-
10. Processing of sold products	35,816.53	24,654.50	20,575.25	-16.55%	-	NA*	-	-
11. Use of sold products	893,194.94	1,136,921.09	803,130.44	-29.36%	-	NA*	-	-
12. End-of-life treatment of sold products	249,850.79	269,934.25	169,492.35	-37.21%	-	NA*	-	-
13. Downstream leased assets	-	-	-	-	-	NA*	-	-
14. Franchises	-	-	-	-	-	NA*	-	-
15. Investments	24,241.07	16,603.22	18,470.59	11.25%	-	NA*	-	-

Total GHG emissions								
Total GHG emissions (location-based) (tCO2eq)	5,512,131.57	5,950,837.48	4,840,647.16	-18.66%	-	NA*	-	-
Total GHG emissions (market-based) (tCO2eq)	5,372,790.94	5,750,664.91	4,649,262.50	-19.15%	-	NA*	-	-90%

*CIE Automotive does not have reduction targets for 2030.

*CIE Automotive is committed to reducing its absolute Scope 1 and 2 GHG emissions by 57.87% by 2033, using 2021 as the base year.

In 2025, significant variations are observed in some Scope 3 emission categories: category 5 (waste generated in operations) shows an increase due to specific difficulties in waste management in certain regions, as explained throughout the report. Meanwhile, categories 9 (downstream transport and distribution), 11 (product use) and 12 (end of product life) show a reduction, mainly associated with a revision of the calculation approach, based on more detailed information from operations and less reliance on general estimates, which better reflects the conditions of transport, use and final treatment of products.

E1 – 6 – 47	*In case of significant changes in the definition of what constitutes the reporting undertaking and its upstream and downstream value chain, the undertaking shall disclose these changes and explain their effect on the year-to-year comparability of its reported GHG emissions (i.e., the effect on the comparability of current versus previous reporting period GHG emissions).*

In the variations for 2025 compared to the 2024 reporting period, it should be noted that the CIE Engrecon and CIE Autometal Piracicaba plants have been added to the emissions report. These plants are medium or medium-low in size, and the decision has been made to maintain the initial reduction and decarbonisation targets in the short term, even with these additions.

E1 – 6 – 48 a) *AR 43*	*The disclosure on gross Scope 1 GHG emissions required by paragraph 44 (a) shall include:* ***(a) the gross Scope 1 GHG emissions in metric tonnes of CO2eq.***

The gross Scope 1 GHG emissions in metric tonnes CO2eq are 95,298.27.

Below is the breakdown of Scope 1 emissions in metric tonnes of CO2eq by continent, country and technology:

Continent	Gross Scope 1 GHG emissions in metric tonnes CO2eq
Europe	30,130.75
Asia	20,815.39
North America	31,732.05
South America	12,620.07
Total	**95,298.27**

Country	Gross Scope 1 GHG emissions in metric tonnes CO2eq
India	20,790.37
China	25.02
France	695.96
Spain	21,894.25
Romania	2,239.75
Lithuania	1,349.94
Slovakia	609.48
Morocco	47.01
Hungary	364.57
Czech Republic	983.34
Portugal	311.00
Italy	1,518.79
Germany	116.67
Mexico	24,479.69
United States	7,252.37
Brazil	12,620.07
Total	**95,298.27**

Technology	Gross Scope 1 GHG emissions in metric tonnes CO2eq
Aluminium injection moulding	30,507.12
Forging	14,299.28
Iron casting	5,323.51
Machining	12,652.35
Stamping and tube forming	21,343.50
Plastic	9,262.85
Roof systems	1,828.98
Non-productive offices	80.68
Total	**95,298.27**

E1 – 6 -49 a) AR 45 and 47	*The disclosure on gross Scope 2 GHG emissions required by paragraph 44 (b) shall include:* ***(a) the gross location-based Scope 2 GHG emissions in metric tonnes of CO2eq.***

The gross location-based Scope 2 GHG emissions in metric tonnes of Co2eq are 438,262.93.

Below is the breakdown of location-based Scope 2 emissions in metric tonnes of CO2eq by continent, country and technology:

Continent	Gross location-based Scope 2 GHG emissions in metric tonnes CO2eq
Europe	49,183.39
Asia	278,694.78
North America	87,591.78
South America	22,792.99
Total	**438,262.93**

Country	Gross location-based Scope 2 GHG emissions in metric tonnes CO2eq
India	254,568.39
China	24,126.38
France	31.82
Spain	24,435.61
Romania	3,108.90
Lithuania	4,900.74
Slovaka	129.57
Morocco	838.89
Hungary	3,249.86
Czech Republic	5,013.42
Portugal	2,132.91
Italy	5,135.79
Germany	205.88
Mexico	68,097.38
United States	19,494.40
Brazil	22,792.99
Total	**438,262.93**

Technology	Gross location-based Scope 2 GHG emissions in metric tonnes CO2eq
Aluminium injection moulding	58,719.33
Forging	129,542.60
Iron casting	94,412.92
Machining	47,693.76
Stamping and tube forming	67,262.27
Plastic	28,703.11
Roof systems	11,560.14
Non-productive offices	368.82
Total	**438,262.93**

E1 – 6 -49 b) AR 45 and 47	*The disclosure on gross Scope 2 GHG emissions required by paragraph 44 (b) shall include:* ***(b) the gross market-based Scope 2 GHG emissions in metric tonnes of CO2eq.***

The gross market-based Scope 2 GHG emissions in metric tonnes of CO2eq. are 246,878.27.

Below is the breakdown of market-based Scope 2 emissions in metric tonnes CO2eq by continent, country and technology:

Continent	Gross market-based Scope 2 GHG emissions in metric tonnes CO2eq
Europe	15,365.03
Asia	76,726.29
North America	1,479.80
South America	153,307.16
Total	**246,878.27**

Country	Gross market-based Scope 2 GHG emissions in metric tonnes CO2eq
India	133,078.55
China	20,228.61
France	31.82
Spain	-
Romania	2,542.20
Lithuania	-
Slovaka	35.17
Morocco	838.89
Hungary	3,249.86
Czech Republic	5,013.42
Portugal	-
Italy	3,548.88
Germany	104.79
Mexico	57,532.49
United States	19,193.80
Brazil	1,479.80
Total	**246,878.27**

Technology	Gross market-based Scope 2 GHG emissions in metric tonnes CO2eq
Aluminium injection moulding	42,306.64
Forging	47,690.55
Iron casting	37,700.11
Machining	35,737.66
Stamping and tube forming	54,525.52
Plastic	18,434.92
Roof systems	10,297.12
Non-productive offices	185.76
Total	**246,878.27**

E1 – 6 – 50 *AR 40 and 41*	*For Scope 1 and Scope 2 emissions disclosed as required by paragraphs 44 (a) and (b) the undertaking shall disaggregate the information, separately disclosing emissions from:* *(a) the consolidated accounting group (the parent and subsidiaries); and* *(b) investees such as associates, joint ventures, or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the consolidated accounting group, as well as contractual arrangements that are joint arrangements not structured through an entity (i.e., jointly controlled operations and assets), for which it has operational control.*

a. The Scope 1 and Scope 2 emissions disclosed for the consolidated accounting group are as indicated in *E1-6-48 a)* and *E1-6-49 b)*, respectively.

b. CIE Automotive does not have investees such as associates, joint ventures, or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the consolidated accounting group, as well as contractual arrangements that are joint arrangements not structured through an entity (i.e., jointly controlled operations and assets), for which it has operational control.

E1 – 6 -51 *AR 46*	*The disclosure of gross Scope 3 GHG emissions required by paragraph 44 (c) shall include GHG emissions in metric tonnes of CO2eq from each significant Scope 3 category (i.e. each Scope 3 category that is a priority for the undertaking).*

The gross GHG emissions of Scope 3 in metric tons of CO2eq are 4,307,085.96.

The significant categories of gross GHG emissions for Scope 3 for the company are as follows:

- Category 1. Purchased goods and services.
- Category 3. Fuel- and energy-related activities not included in Scope 1 or Scope 2.
- Category 4. Upstream transportation and distribution.
- Category 5. Waste generated in operations.
- Category 9. Downstream transportation and distribution.
- Category 10. Processing of sold products.
- Category 11. Use of sold products.
- Category 12. End-of-life treatment of sold products.
- Category 15. Investments.

Below are the gross GHG emissions for Scope 3 from the mentioned categories, broken down by continent, as well as the total value:

Scope 3 Categories	**Gross Scope 3 GHG Emissions by continent (Metric tons of CO2eq)**				
	Europe	**North America**	**South America**	**Asia**	**Total**
Category 1	667,664.16	1,031,204.86	315,180.96	1,099,439.47	3,113,489.45
Category 3	16,930.76	18,428.56	17,291.39	16,520.95	69,171.67
Category 4	5,465.23	11,696.49	4,223.80	19,190.57	40,576.10
Category 5	1,845.90	3,844.72	14,094.42	15,785.78	35,570.82
Category 9	5,561.84	17,647.57	4,241.01	9,158.88	36,609.30
Category 10	5,405.76	6,432.12	2,060.99	6,676.38	20,575.25
Category 11	183,025.85	254,294.09	83,001.65	282,808.86	803,130.44
Category 12	35,639.48	54,650.86	19,103.22	60,098.79	169,492.35
Category 15	0.00	779.96	0.00	17,690.63	18,470.59
TOTAL	**921,538.98**	**1,398,979.23**	**459,197.45**	**1,527,370.31**	**4,307,085.9**

Regarding the remaining categories, they are considered exclusions from the study due to:

- Category 2. Capital goods: This category has been excluded due to several studies conducted by the company, where machines were selected as a representative sample of the company's productive activity. The result showed that the carbon footprint of this category does not exceed 0.1% of the company's total carbon footprint.
- Category 6. Business travel: This category has been excluded because it represents 0.1% or less of the company's total carbon footprint.
- Category 7. Employee commuting: This category has been excluded because it represents 0.1% or less of the company's total carbon footprint.
- Category 8. Upstream leased assets: This category has been excluded b8ecause it represents 0.01% or less of the company's total carbon footprint.
- Category 13. Downstream leased assets: This category is not applicable to our company.
- Category 14. Franchises: This category has been excluded since CIE Automotive does not have franchises.

E1 – 6 -52 a) *AR 47*	*The disclosure of total GHG emissions required by paragraph 44 (d) shall be the sum of Scope 1, 2 and 3 GHG emissions required by paragraphs 44 (a) to (c). The total GHG emissions shall be disclosed with a disaggregation that makes a distinction of:* ***(a) the total GHG emissions derived from the underlying Scope 2 GHG emissions being measured using the location-based method***

Gross Scope 1 GHG emissions (t CO2 eq)	95,298.27
Gross Scope 2 GHG emissions (t CO2 eq)	438,262.93
Gross Scope 3 GHG emissions (t CO2 eq)	4,307,085.96
Total GHG emissions (t CO2 eq)	**4,840,647.16**

E1 – 6 -52 b) *AR 47*	*The disclosure of total GHG emissions required by paragraph 44 (d) shall be the sum of Scope 1, 2 and 3 GHG emissions required by paragraphs 44 (a) to (c). The total GHG emissions shall be disclosed with a disaggregation that makes a distinction of:* ***(b) the total GHG emissions derived from the underlying Scope 2 GHG emissions being measured using the market-based method.***

Gross Scope 1 GHG emissions (t CO2 eq)	95,298.27
Gross Scope 2 GHG emissions (t CO2 eq)	246,878.27
Gross Scope 3 GHG emissions (t CO2 eq)	4,307,085.96
Total GHG emissions (t CO2 eq)	4,649,262.50

E1 – 6 – 53 AR 5	*The undertaking shall disclose its GHG emissions intensity (total GHG emissions per net revenue).*

Total GHG emissions intensity (location-based) (tCO2eq/k€)	1.22
Total GHG emissions intensity (market-based) (tCO2eq/k€)	1.17

E1 – 6 – 54 AR 5	*The GHG intensity information required in paragraph 53 shall provide the total GHG emissions in metric tonnes of CO2 equivalent (required in paragraph 44(d)) per net revenue.*

Total GHG emissions intensity (location-based) (tCO2eq/k€)	1.22
Total GHG emissions intensity (market-based) (tCO2eq/k€)	1.17

E1 – 6 – 55	*The undertaking shall disclose the reconciliation to the relevant line item or notes in the financial statements of the net revenue amounts (the denominator in the calculation of the GHG emissions intensity required by paragraph 53).*

The 2025 CIE Automotive net revenue is 3,958,253,000 Euro.

2.2.4.4 DR E1-7: GHG removals and GHG mitigation projects financed through carbon credits

The following indicators do not apply to CIE Automotive because the company does not have GHG mitigation projects financed with carbon credits; nor does it have GHG absorption projects to neutralise emissions: *E1-7-56 a) AR 56 and 57, E1-7-56 b), E1-7-58 a) AR 56 and 59, E1-7-58 b), E1-7-59 a), E1-7-59 b), E1-7-61 a), E1-7-61 b),* and *E1-7-61 c).*

E1 – 7 – 60	*In the case where the undertaking discloses a net-zero target in addition to the gross GHG emission reduction targets in accordance with Disclosure Requirement E1-4, paragraph 30, it shall explain the scope, methodologies and frameworks applied and how the residual GHG emissions (after approximately 90-95% of GHG emission reduction with the possibility for justified sectoral variations in line with a recognised sectoral decarbonisation pathway) are intended to be neutralised by, for example, GHG removals in its own operations and upstream and downstream value chain.*

The net zero emissions target, in addition to the gross GHG emissions reduction targets in accordance with Disclosure Requirement E1-4, paragraph 30, includes the entire CIE Automotive Group and involves the entire value chain. For the residual percentage, which will not exceed 10% in 2050, greenhouse gas elimination policies are expected to be implemented in the supply chain in order to achieve net zero impact. However, the specific methodologies and frameworks to be applied in 2050 have not yet been defined.

2.2.4.5 DR E1-8: Internal carbon pricing

E1 – 8 – 63 a)	*The information required by paragraph 62 shall include: the type of internal carbon pricing scheme, for example, the shadow prices applied for CapEX or research and development (R&D) investment decision making, internal carbon fees or internal carbon funds.*

CIE Automotive does not use carbon credits, but does use internal carbon pricing to monetise the impact of its operations on climate change and the environment. This is an internal carbon rate used to measure the improvement and environmental performance of the plants to draw a comparative analysis.

E1 – 8 – 63 b)	*The information required by paragraph 62 shall include: the specific scope of application of the carbon pricing schemes (activities, geographies, entities, etc.)*

The scope of application of the carbon pricing schemes (activities, geographies, entities, etc.) is CIE Automotive, and it affects the energy categories (fuels and electricity).

E1 – 8 – 63 c)	*The information required by paragraph 62 shall include: (c) the carbon prices applied according to the type of scheme and critical assumptions made to determine the prices, including the source of the applied carbon prices and why these are deemed relevant for their chosen application. The undertaking may disclose the calculation methodology of the carbon prices including the extent to which these have been set using scientific guidance and how their future development is related to science-based carbon pricing trajectories.*

The internal price is obtained from the Sendeco2 website and is regularly updated for calculation.

CO2 prices	EU Allowance
Annual average €73.95	
January	€76.11
February	€75.47
March	€68.47
April	€64.30
May	€70.17
June	€72.17
July	€70.31
August	€71.12
September	€75.67
October	€78.21
November	€80.93
December	€83.90

E1 – 8 – 63 d)	*The information required by paragraph 62 shall include: (d) the current year approximate gross GHG emission volumes by Scopes 1, 2 and, where applicable, Scope 3 in metric tonnes of CO2eq covered by these schemes, as well as their share of the undertaking's overall GHG emissions for each respective Scope.*

The approximate volumes of gross GHG emissions for the current year for Scopes 1 and 2 in metric tonnes of CO2eq covered by these schemes, as well as their proportion of the company's total GHG emissions for each respective Scope, are 99% of Scope 1 and Scope 2.

2.2.4.6 DR E1-9: Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

In this second year of implementation of the directive, no information will be reported on indicators E1-9-66 a), E1-9-70 and AR 72 and 79, due to the application of Delegated Regulation 2025/1416 ("quick fix") published in the OJEU on 10 November 2025, which amends the delegated regulation adopting the ESRS, in particular for first-phase companies, freezing and delaying the application of the transitional provisions by two years.

E1 – 9 – 66 b)	*The disclosure of anticipated financial effects from material physical risks required by paragraph 64 (a) (the undertaking shall disclose its anticipated financial effects from material physical risks) shall include: **(b) the proportion of assets at material physical risk addressed by the climate change adaptation actions**.*

The adaptation actions are included under *ESRS 2- SBM-3 –19 c)* and cover 100% of CIE Automotive's assets and locations.

E1 – 9 – 66 c) *AR 70*	*The disclosure of anticipated financial effects from material physical risks required by paragraph 64 (a) (the undertaking shall disclose its anticipated financial effects from material physical risks) shall include: **(c) the location of significant assets at material physical risk.***

The analysis under *E1-9-66 d)* is carried out for all of the CIE Automotive Group's locations.

E1 – 9 – 66 d) *AR 71*	*The disclosure of anticipated financial effects from material physical risks required by paragraph 64 (a) (the undertaking shall disclose its anticipated financial effects from material physical risks) shall include:* ***(d) the monetary amount and proportion (percentage) of net revenue from its business activities at material physical risk over the short-, medium- and long-term.***

As detailed under *ESRS 2- SBM-3 –19 c)*, both the chronic and acute physical risks have come out with a risk level of less than 2.12 on a scale of 5 for the 2050 time horizon and the Net Zero Emissions scenario (the worst-case scenario). This process, detailed above, is based on surveys of key people in the organisation at the plant, regional and technology level. This procedure calculates the percentage of EBITDA and amount of revenues at risk. The level of risk is low and, accordingly, the potentially affected revenues are immaterial and none of CIE Automotive's targets or commitments are jeopardised.

E1 – 9 – 67 a)	*The disclosure of anticipated financial effects from material transition risks required by paragraph 64 (b) (the undertaking shall disclose its anticipated financial effects from material transition risks) shall include:* ***(a) the monetary amount and proportion (percentage) of assets at material transition risk over the short-, medium- and long-term before considering climate mitigation actions.***

This year CIE Automotive will not disclose any financial impacts on assets at material transition risk over the short-, medium- and long-term.

E1 – 9 – 67 b)	*The disclosure of anticipated financial effects from material transition risks required by paragraph 64 (b) (the undertaking shall disclose its anticipated financial effects from material transition risks) shall include:* ***(b) the proportion of assets at material transition risk addressed by the climate change mitigation actions.***

The adaptation actions are shown under *ESRS 2- SBM-3 –19 c)* and cover 100% of CIE Automotive's assets and locations.

E1 – 9 – 67 c) and d)	*The disclosure of anticipated financial effects from material transition risks required by paragraph 64 (b) (the undertaking shall disclose its anticipated financial effects from material transition risks) shall include:* ***(c) a breakdown of the carrying value of the undertaking's real estate assets by energy-efficiency classes.*** ***(d) liabilities that may have to be recognised in financial statements over the short-, medium- and long-term.***

This year CIE Automotive will not disclose information relating to these indicators.

E1 – 9 – 67 e)	*The disclosure of anticipated financial effects from material transition risks required by paragraph 64 (b) (the undertaking shall disclose its anticipated financial effects from material transition risks) shall include:* ***(e) the monetary amount and proportion (percentage) of net revenue from its business activities at material transition risk over the short-, medium- and long-term including, where relevant, the net revenue from the undertaking's customers operating in coal, oil and gas-related activities.***

As shown under *ESRS 2- SBM-3 –19 c)*, the transition risks have come out with a risk level of less than 2.429 on a scale of 5 for the 2050 time horizon and the Net Zero Emissions scenario (the worst-case scenario). This process, detailed above, is based on surveys of key people in the organisation at the plant, regional and technology level.

This procedure calculates the percentage of EBITDA and amount of revenues at risk. The level of risk is low and, accordingly, the potentially affected revenues are immaterial and none of CIE Automotive's targets or commitments are jeopardised.

On the other hand, CIE Automotive has no activities related to coal, oil and gas.

E1 – 9 – 68 a) and b)	*The undertaking shall disclose reconciliations to the relevant line items or notes in the financial statements of the following:* *(a) significant amounts of the assets and net revenue at material physical risk (as required by paragraph 66).* *(b) significant amounts of the assets, liabilities, and net revenue at material transition risk (as required by paragraph 67).*

This year CIE Automotive will not disclose information relating to these indicators.

E1 – 9 – 69 a) AR 80 and b) AR 81	*For the disclosure of the potential to pursue climate-related opportunities required by paragraph 64 (c) (the undertaking shall disclose its potential to benefit from material climate-related opportunities), the undertaking shall consider.* *(a) its expected cost savings from climate change mitigation and adaptation actions. (b) the potential market size or expected changes to net revenue from low-carbon products and services or adaptation solutions to which the undertaking has or may have access.*

This year CIE Automotive will not disclose information relating to these indicators.

2.3 Pollution (ESRS E2)

2.3.1 Management of impacts, risks and opportunities

2.3.1.1 DR related to ESRS 2 IRO-1 - Description of the process to identify and assess impacts, risks and opportunities related to pollution

E2-IRO-1-11 a) AR 1-AR 9	*The undertaking shall describe the process to identify material impacts, risks and opportunities, and shall provide information on:* ***(a) whether the undertaking has screened its site locations and business activities in order to identify its actual and potential pollution-related impacts, risks and opportunities in its own operations and upstream and downstream value chain, and if so, the methodologies, assumptions and tools used in the screening;***

As stated in the response to *ESRS 2 – SBM-3- 19 b) AR 7a AR 7b and 7c and AR 13*, there is a single process for determining the material impacts, risks and opportunities related to the environmental area is unique and carried out every two years.

One of the reasons for pursuing a single analysis model is the high-level integration with the overall process (ESRS E1) which is described in *ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities*.

Of course, this process can be seen to be integrated with the overall analysis of impacts, risks and opportunities (IROs) included as the response to *ESRS 2 IRO-1*, whose part in the overall impacts risks and opportunities arising from pollution are shown below.

Impacts, Risks and Opportunities (IROs)

+: positive impact // -: negative impact // R: risk // O: opportunity

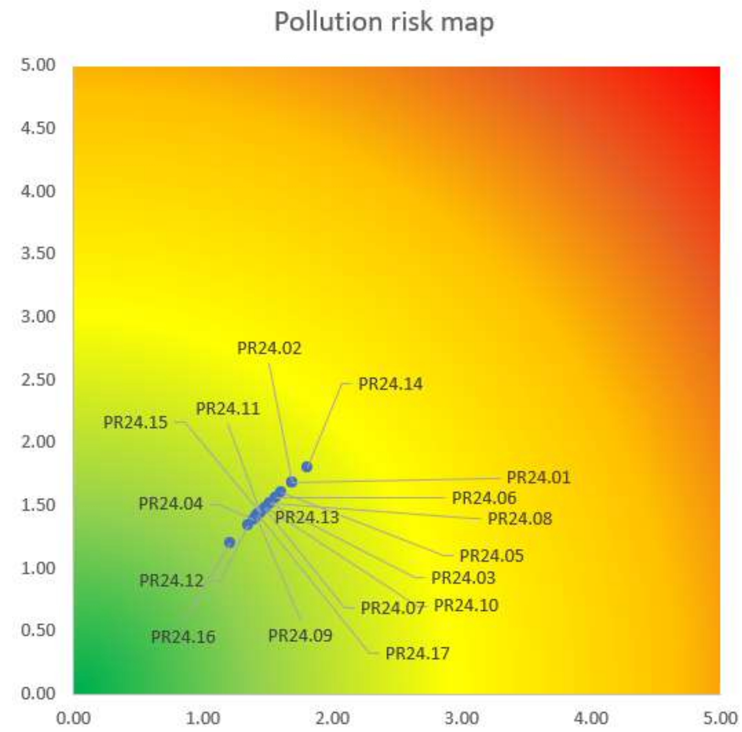
Subtopics	IROs
Air pollution	(-) Air pollution associated with generation of Scope 3 emissions.
	(- and R) Increase in the company's environmental footprint due to selling parts manufactured in other geographic locations to meet the requirements of certain customers.
	(+ and O) Reduction of Scope 1 and 2 emissions due to the use of renewable energy and self-generation of energy to supply the company's facilities.
Water pollution	(+) Reduced potable water consumption due to increased use of recycled water.
	(R) Financial impacts arising from: Increased eutrophication of water due to discharges from non-recycled water.
	(R) Financial impacts arising from: Increased ecotoxicity of freshwater due to non-recycled waste in production processes.
Pollution of soil	(R) Financial impacts arising from: Soil contamination through chemical soil erosion during the extraction of raw materials.

For a more detailed analysis of the risks arising from pollution, the following risks are analysed:

- PR24.01 : Risk of generating hazardous waste.
- PR24.02 : Risk of accidental spills.
- PR24.03 : Risk of mismanagement of solid waste.
- PR24.04 : Risk of using polluting materials.
- PR24.05: Risk of greenhouse gas (GHG) emissions.

- PR24.06: Risk of fine particulate matter (PM) emissions.
- PR24.07: Risk of volatile and toxic organic substances.
- PR24.08 : Risk of energy inefficiency.
- PR24.09 : Risk of untreated discharges.
- PR24.10 : Risks of chemical leaks.
- PR24.11 : Risk of excessive water consumption.
- PR24.12 : Risk of alteration of aquatic ecosystems.
- PR24.13: Risk of noise in logistics areas.
- PR24.14: Risk of impact on workers.
- PR24.15: Risk of impact on nearby communities.
- PR24.16 : Risk of excessive artificial lighting.
- PR24.17 : Risk of improper handling of plastic materials.

None of these risks reaches a value of 2 (medium) on a scale of 5 as shown in the heat map below, where the risk level is shown on the y-axis and the probability on the x-axis.



E2-IRO-1-11 b) *AR 1-AR 9*	*The undertaking shall describe the process to identify material impacts, risks and opportunities, and shall provide information on:* ***(b) whether and how the undertaking has conducted consultations, in particular, with affected communities.***

The overall process followed to identify and assess the impacts, risks and opportunities related to pollution, as well as whether consultations were carried out, are described under ESRS 2 IRO-1 *Description of the process to identify and assess material impacts, risks and opportunities*.

The entire environmental domain, in particular the risk, opportunity and resilience analysis process, is included and explained under the preceding indicator *ESRS 2 – SBM-3- 19 a) and b)* above.

2.3.1.2 DR E2-1 – Policies related to pollution

E2-1-14 *AR 10*	*The disclosure required by paragraph 12 shall contain the information on the policies the undertaking has in place to manage its material impacts, risks and opportunities related to pollution in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters.*

Title	**Environmental policy**
Description	CIE Automotive Group's environmental policy.
Objective	The purpose of this policy is to integrate environmental practices throughout the Value Chain. Doing this will contribute to achieving the United Nations Sustainable Development Goals (SDGs), and ensure transparency in the reporting on our environmental performance. The commitments in this policy are articulated as a key tool to achieve the group's goal of being a net zero emissions company by 2050 and the 1.5ºC target aligned with the Paris Agreement, in addition to its legal commitments and those of its stakeholders. As a leading global multi-technology supplier to the automotive industry, CIE Automotive has a clear commitment to sustainable development, the environment, biodiversity and the fight against climate change. We also recognise our responsibility to minimise the environmental impact of our activities, products and services, in line with the principles of sustainability and current legislation, our stakeholders' requirements and the voluntary commitments undertaken by the company. This commitment is reflected in our Environmental Policy, which guides our strategic and operational decisions towards a more sustainable business model.
Material Impacts, Risks and Opportunities	As part of the continuous reviews of the Strategic Plan, the Management Plan and the potential Transition Plan, the dependencies, impacts, risks and opportunities are assessed to ensure that the risks are mitigated and the opportunities are taken advantage of. For the environmental risks, at minimum, any acute physical, chronic physical and transitional climate risks will be addressed and risk analyses of pollution, circularity, water and biodiversity will be launched. The risk map is integrated into CIE Automotive's Risk Management System (RMS), which follows the ISO 31000 methodology and provides reasonable assurance that all significant environmental risks are prevented, identified, assessed and monitored on an ongoing basis. These risks are approved by the Board and managed according to risk tolerance levels. The Environmental Policy forms part of the company's governance process, along with the dual materiality analysis and the IROs identified in it. The policy therefore addresses the material IROs of the above analysis, and this is also reflected in the response to *ESRS 2-SBM-3-19 a), E1-2-25* and *E5-3-23*.
Scope of the policy	The scope of this policy covers all of CIE Automotive's subsidiaries and affiliates where the company exercises financial and operational control. There are no geographical or technological exclusions. This policy has also been established to allow monitoring of the supply chain, to ensure that all its participants have commitments in line with those of the company; and to manage information security when the products sold are being developed and manufactured. The Group's environmental policy addresses prevention, preparation for reuse, recycling, energy recovery and disposal of waste, prioritising them in that order. Similarly, waste avoidance or minimisation is prioritised over waste treatment.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	This policy applies globally.
Value Chain	The policy includes a commitment to promote and require environmental commitments in line with those of the company throughout the Value Chain.
Body responsible for implementation	CIE Automotive's Board, through its Audit Committee, is ultimately responsible for the existence and application of this policy. The ESG Committee will oversee the implementation of this policy and ensure it is aligned with the strategic and regulatory goals, with the support of the CEO, who in turn will be supported by the corporate Engineering, Quality and Environment Department and the Horizontal ESG Committee.

Publication	Public document posted on the corporate website, and available to all Group employees through the corporate intranet and the Management Model.

The response to *E2-3-22* discussed the importance of implementing integrated management systems, and more specifically for them to include environmental management systems (EMS) and how to ensure their effectiveness and continuous improvement.

At this point it should be emphasised that these ISO 14001 based systems ensure a value chain and stakeholder focus with key points of the value chain being ensured via internal audits and third-party audits.

Some of these key points of the EMS, where the Environmental Policy is a key point and focus of this audit and review process, are:

1. Organisational context and stakeholder analysis
The standard states that the organisation must:
- Identify relevant stakeholders (customers, suppliers, contractors, regulators, community, etc.) and understand their needs and expectations related to environmental performance.
- Incorporate these expectations into the environmental management system, to ensure that stakeholders' concerns are taken into account.

2. Value chain management
The ISO 14001 standard includes a clear focus on the value chain, ensuring that environmental impacts are not just limited to internal operations, but are considered at all stages, such as:
- Supply of raw materials: Promote purchases of materials from suppliers that comply with environmental requirements.
- Design of products and services: Promote a life-cycle approach, considering environmental impacts from the extraction of raw materials to the end of the product's useful life.
- Management of suppliers and contractors: The standard requires organisations to establish environmental requirements for their suppliers and subcontractors. This may include contractual clauses, audits and training programmes.

3. Product life cycle (life cycle approach)
The ISO 14001 standard incorporates the concept of "life cycle", which means that organisations must assess and minimise environmental impacts at all stages of their value chain:
- Extraction of raw materials.
- Production/distribution.
- Product use.
- Final disposal or recycling.

This obliges the organisation to work closely with its partners in its value chain to identify and manage environmental impacts at each stage.

4. Communication with stakeholders
The standard promotes effective communication with internal and external stakeholders to:
- Report on environmental performance and risk management.
- Encourage collaboration with partners, suppliers and customers on environmental initiatives.

Strengthen transparency and trust with the community and other stakeholders.

E2-1-15 a) *AR 11*	*The undertaking shall indicate, with regard to its own operations and its upstream and downstream value chain, whether and how its policies address the following areas where material:* ***(a) mitigating negative impacts related to pollution of air, water and soil including prevention and control.***

The group's environmental policy includes these aspects and commitments, among others:

1. Mandatory and voluntary compliance
We ensure compliance with all applicable environmental legislation, stakeholder requirements and voluntary commitments, ensuring transparent and documented environmental management.

2. The fight against climate change. Incorporating strategies of:
- Climate change mitigation.
- Climate change adaptation.

3. Preservation of air, soil and water quality
- Pollution prevention: Soil, Water, Air and Noise.
- Reduction of the acoustic impact of our activities.
- Location of our production plants, avoiding deforestation and impacts on biodiversity.

4. Energy Efficiency and Reducing Emissions
- We promote energy efficiency in our operations by implementing clean technologies and transitioning to renewable energy sources.
- We are committed to progressively reducing our greenhouse gas (GHG) emissions, aligning ourselves with the objectives of the Paris Agreement.

5. Management of Resources and Waste
- We optimise the use of materials in our production processes, prioritising recycled and sustainable raw materials.
- We implement circular economy practices, minimising waste generation and maximising reuse or recycling.

6. Design of Sustainable Products and Processes under Eco-design concepts

We incorporate sustainability principles into the design of our components, their manufacturing process and their life cycle, including:
- Lightweight and recyclable materials that improve fuel efficiency.
- Products designed for easy repair, reuse or recycling.
- Circularity of materials.
- Efficient and sustainable processes.
- Ensuring the safety of our products throughout the value chain and in their end use.

7. Protection of Biodiversity and Responsible Use of water resources
- We conduct environmental impact assessments of our facilities to minimise disruption to local ecosystems.
- We manage our water use responsibly, reducing consumption and guaranteeing the quality of the water we discharge. Including:
  - The use and sourcing of water resources in our own operations
  - Water treatment as a step towards more sustainable water use.
  - Prevention and abatement of water pollution resulting from our activities.
- Protecting water resources, including river and marine resources.

8. Getting people engaged: "we can all improve our environment"

9. Promoting and requiring environmental commitments in line with those of the company throughout the value chain

10. Prevention and management of accidents and emergency situations, mitigating the negative impact on people and the environment

11. Transparency and Reporting
- We publish annual sustainability reports in accordance with the Corporate Sustainability Reporting Directive (CSRD), providing verifiable data on our environmental actions, targets and results.
- We establish key performance indicators to measure and show our progress.

12. We set targets and measure our performance through the scorecard, with indicators such as:
- Energy efficiency.
- Reducing emissions.
- Water consumption.
- Generation of waste.
- Circularity.
- Use of renewable energy.
- Product safety.
- Accidents and emergencies.

E2-1-15 c) *AR 11*	*The undertaking shall indicate, with regard to its own operations and its upstream and downstream value chain, whether and how its policies address the following areas where material:* ***(c) avoiding incidents and emergency situations, and if and when they occur, controlling and limiting their impact on people and the environment.***

The response to this indicator is provided under *E2-1-14* and *E2-1-15 a)*

2.3.1.3 DR E2-2 - Actions and resources related to pollution

E2-2-18	*The description of the pollution-related action plans and resources shall contain the information prescribed in ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.*

Action	**CIE Automotive's integrated management model**
Results	Ensure the Group's best practices are implemented at all CIE Automotive locations, seeking continuous improvement and reduction of impacts on the environment, soil, air and water, along with appropriate use of water and marine resources.
Scope	The entire Group, including areas of high-water stress and getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	Continuous improvement every year.
Actions	Elaboration of a Management Model applicable to all the group's plants. This model is strengthened with the best practices detected in any of the locations and with requests transmitted by stakeholders.
Information	To ensure its implementation, both internal and third-party assessments are carried out in accordance with various standards such as ISO 14001 and ISO 50001. By 2025, over 98% of CIE's locations were ISO 14001 certified.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Implementation of an environmental management system**
Results	As part of its management model, CIE Automotive's environmental management system guarantees the analysis of risks and opportunities at local level and their improvement and mitigation plan, using metrics and measuring their impact and effectiveness.
Scope	The entire Group, including areas of high water stress and getting the value chain involved.
Horizon	Continuous improvement every year.
Actions	Group requirement for all plants to obtain ISO 14001 certification. Additionally, the certification body is global so that any deviations can be tracked more closely, compliance with the Management Model can be better ensured, and the lessons learned and best practices can be optimally applied horizontally.
Information	The implementation and certification according to ISO 14001 helps reduce the environmental impact in several ways: **1. Identification and Management of Environmental Impacts** ISO 14001 requires organisations to identify aspects of their activities, products or services that affect the environment (such as emissions, resource use, waste generation), and to develop strategies to mitigate them. **2. Legal compliance** The certification ensures that the organisation complies with local, national and international environmental legislation, reducing the risk of sanctions for non-compliance. **3. Efficiency in resource consumption** Implementing ISO 14001 encourages the optimisation of the use of resources such as water, energy and raw materials, which reduces the environmental impact associated with their extraction, production and consumption.

	4. Pollution Prevention The standard incentivises action to prevent pollution, rather than to correct it afterwards. This includes minimising emissions, reducing waste and handling chemicals safely. **5. Promoting continuous improvement** ISO 14001 requires a continual improvement approach, ensuring that organisations regularly implement actions to reduce their long-term environmental impacts. **6. Environmental awareness** The certification promotes awareness and training of employees and stakeholders on sustainable practices, thus fostering a more environmentally responsible organisational culture. **7. Reputation and competitiveness** Certified companies are valued more highly by stakeholders, who prioritise sustainability, promoting environmentally responsible business practices throughout the supply chain. Currently over 98% of the Group's locations are ISO 14001 certified.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Eco-design**
Results	Introduction of eco-design criteria in the process of launching and industrialising new projects, as well as the dissemination of eco-design manuals and tools.
Scope	The entire Group, including areas of high water stress and getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	This has already been introduced into the management system and is updated on a recurring basis to ensure its effectiveness.
Actions	Introduction into the processes and procedures for developing and launching new products and projects.
Information	CIE Automotive's Process 3 contains a series of checklists that coincide with each step of the Advanced Product Quality Planning (APQP) process, which are reviewed by plant and project management to move on to the next phase, and that incorporate the review of eco-design concepts in the project. Eco-design tools have been developed to help achieve this.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Active listening**
Results	Membership in associations aligned with CIE Automotive's objectives and policy.
Scope	Organisations aligned with eco-design, circularity, climate change, emission reduction and environmental impact reduction objectives, with a special focus on the value chain and stakeholders.
Horizon	This is an action with a long-term horizon.
Actions	Align sector objectives, both downstream and upstream. Promote the objectives reflected in the group's policy and commitments in entities that have difficulties in applying them, such as SMEs in particular. Identify new challenges and trends. Stimulate joint proposals.
Information	At the institutional level, CIE Automotive works through the Board of the Spanish Association of Automotive Suppliers (Sernauto) to promote actions to achieve climate neutrality and collaborates to set more ambitious targets for the sector. The group is a founding member of the Basque Ecodesign Center, where it works together with various government representatives and different industrial sectors to promote circularity, decarbonisation and the fight against climate change. CIE Automotive has been involved in new mobility solutions focused on zero-emission vehicles from the early stages of development. This strategy has led it to participate in Basquevolt since 2021, the Basque initiative for producing solid-state batteries. It also belongs to Forética's Climate Change Cluster [*Clúster del Cambio Climático de Forética*], a group of companies that translates the main trends and conversations on climate change worldwide into the Spanish context. It is also a member of the Spanish Quality Association [*Asociación Española de Calidad*], which has various working groups in the environmental area to influence the development of new legislation and provide guidelines and training to help the industry manage climate change.
Description of associated CapEx and OpEx	No specific CapEx or OpEx is required.

Action	**Governance and involvement of senior management**
Results	Incorporate environmental and sustainability criteria into all the company's decisions and therefore into its strategy.
Scope	The entire Group, including areas of high water stress.
Horizon	This is an action with a long-term horizon.
Actions	Boost interaction between all levels of the company by fostering fluid information and communication.
Information	The Board and the Management Committee are engaged in the fight against climate change. The ultimate responsibility for environment-related activities rests with the Board. Within the Board, the environmental representative is the ESG Committee. The chair of this committee has experience and knowledge regarding climate change. The company's CEO, in turn, is involved in sustainable growth and is ultimately responsible for the achievement of the Strategic Plan, which integrates the ESG Plan. The ESG Committee is a body that reports and makes proposals to CIE Automotive's ESG Committee. The Director of Engineering, Quality and Environment is part of this committee and manages the deployment of the strategic plan in the environmental area. Bringing engineering and environment together under one Director ensures that all the environmental objectives are addressed upstream and at the R&D stage.
Description of associated CapEx and OpEx	No specific CapEx or OpEx is required.

Action	Durability
Results	Increase the robustness of products through design processes with durability prediction and improved life prediction through simulation.
Scope	Products that CIE Automotive helps manufacture or design. Getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	The process of improvement is continuous. However, in recent years, improvements were made to the systematic approach.
Actions	Implementation of design processes that incorporate simulation of events the component may undergo in real life and correlating them through physical testing to close the design loop.
Information	Durability simulation significantly boosts the robustness of automotive components by making it possible to predict, evaluate and improve their performance under various conditions of use throughout their life cycle. For this purpose, integrating virtual and physical validation is crucial, and can lead to the following improvements or advantages: **1. Early detection of potential malfunctions:** - The simulations make it possible to identify weak points or failure-prone areas in components before the physical prototypes are manufactured. - This reduces the risk of problems during physical tests or in actual use of the vehicle. **2. Design optimisation** - The simulation tools help adjust the design parameters, such as geometry, materials and manufacturing processes, to improve the component's robustness to fatigue, vibration and other stresses. - This makes it possible to create more robust designs without the need to oversize the components. **3. Validation under real conditions** - The simulations can replicate real-world conditions of use, such as dynamic loads, thermal variations, corrosion and load/unload cycles. - This ensures that the components maintain their functionality and safety even under adverse conditions. **4. Reduced costs and development time** - By replacing some physical tests with virtual simulations, the costs and development times associated with manufacturing and testing multiple prototypes are minimised. - This allows for faster design iteration and a focus on more robust solutions. **5. Improvements in reliability and safety** - By anticipating the components' limits, the simulations help ensure that they will perform correctly throughout their lifetime, increasing consumer confidence in the quality and safety of the vehicle. **6. Compliance with the law and industry standards** - The durability simulations help ensure that the components meet stringent automotive industry standards, such as those relating to structural fatigue, impacts and vibrations.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	Repairability, reusability and end-of-life of vehicles
Results	Improved component designs to make them easier to repair, reuse, disassemble, recycle and recover at the end of their useful life.
Scope	Products that CIE Automotive helps manufacture or design. Getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	The process of improvement is continuous. However, in recent years, improvements were made to the systematic approach.
Actions	The requirements that customers indicate with respect to these points in the specifications of their development projects must be taken into account, but in any case, laws such as EU Directives 2000/53/EC and 2005/64/EC seek to promote these points.
Information	**Directive 2000/53/EC on End-of-Life of Vehicles** This directive, also known as the ELV Directive, establishes measures to prevent and reduce the environmental impact of the end-of-life of vehicles. The key points include: - **Design for disassembly and recycling**: Manufacturers should consider, during design and production, the ease of dismantling, re-use and recovery of vehicles. - **Limitation of hazardous substances**: The use of materials such as lead, mercury, cadmium and hexavalent chromium is prohibited in the manufacture of vehicles, with some specific exceptions. - **Reuse and recycling objectives**: New vehicles must be reusable and/or recyclable for at least 85% of their weight, and at least 95% reusable and/or recoverable. **Directive 2005/64/EC on the type-approval of motor vehicles with regard to their reusability** This directive complements the previous one, focusing on the type-approval of motor vehicles with regard to their suitability for re-use, recycling and recovery. It establishes requirements to ensure that vehicles meet the minimum reuse and recycling rates mentioned above. More recently, actions have been promoted that are in line with the “right to repair".
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group’s R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

One of the foundations of the integrated management system is to close the circle of strategy, policies, actions and objectives or goals by ensuring the processes and actions are effective. To this end, actions are linked to targets or objectives that are continuously reviewed as metrics of the effectiveness of each action and of the system.

It should be recalled that one of the pillars of environmental management systems certified with the ISO 14001 standard is the Plan-Do-Check-Act (PDCA) cycle approach, which ensures continuous improvement:

- **Plan:** Identify environmental aspects, legal requirements and risks/opportunities; define environmental objectives and targets; and establish action plans.
- **Do:** Implement the plans and procedures designed.
- **Check:** Monitor, measure, analyse and evaluate environmental performance against the established objectives.
- **Act:** Correct and adjust the system as necessary to improve its effectiveness.

This pillar is combined with two other key pillars:

Monitor, measure and assess performance

- The standard requires organisations to continuously monitor their environmental performance, assessing whether the objectives and targets are being met.

- Internal audits are a key tool to verify the effectiveness of the system. In the case of CIE Automotive, these are corroborated by third-party certification.

Continuous improvement

The standard encourages continual improvement through periodic reviews of the system, identification of non-conformities and implementation of corrective and preventive actions. This allows the system to constantly progress and become more effective in achieving its goals.

For this purpose, a matrix has been set up to ensure that all the actions are linked to objectives or goals. This is shown in the table below, where the entries identified with an asterisk (*) are those that are mainly involved in the value chain.

		Obj1	Obj2	Obj3	Obj4	Obj5	Obj6	Obj7	Obj8	Obj9	Obj13
		Energy consumption intensity reduction	Direct GHG emissions reduction (Scope 1)	Indirect GHG emissions reduction (Scope 2)	Direct and indirect GHG emissions intensity reduction (Scope 1 and 2)	Reduction of total non-recycled waste generated	Reduction of water extraction intensity	General Net-Zero target	Short-medium term reduction targets for Scope 1+2	Short-medium term reduction target for Scope 3	ISO 14001 certification
Act 1	Non-renewable fuel substitution	x	x	x*	x			x	x	x	x
Acc2	Purchase of renewable electricity			x	x		x*				
Acc3	Energy efficiency via Industry 4.0 initiatives	x	x	x	x	x		x	x	x*	x
Acc4	Reduction of gross weight-net weight ratio	x	x	x	x	x	x*	x	x	x	
Acc5	Circularity projects	x*	x*	x*	x*	x*		x	x*	x	x
Acc6	Adaptation of Azkoitia landfill to current legislation										x
Acc7	Key product carbon footprint calculation	x	x	x	x	x	x	x	x	x	
Acc8	Environmental data management digitization	x	x	x	x	x	x	x	x	x	x
Acc9	Supply Chain Race2Zero project	x*	x*	x*	x*	x*	x*	x	x*	x	x*
Acc10	"Materials" project	x*	x*	x*	x*	x*	x*	x	x*	x	x*
Acc11	Auxiliary equipment	x	x	x	x		x*	x*	x	x*	x*
Acc12	Eco-design	x	x	x	x	x	x	x	x	x	x
Acc13	Integrated Management Model CIE Automotive	x	x	x	x	x	x	x	x	x	x
Acc14	Implementation of an Environmental Management System	x	x	x	x	x	x	x	x	x	x
Acc15	Durability					x*	x*	x		x	x
Acc16	Repairability, reuse, and end-of-life of vehicles					x*	x*	x		x	x
Acc17	Active listening	x	x	x	x	x	x	x	x	x	x
Acc18	Governance and involvement of top management	x	x	x	x	x	x	x	x	x	x
Acc19	Increase in water	x*	x*	x*	x*	x	x	x*	x*	x*	x
Acc20	Improvement in water treatment systems	x*	x*	x*	x*	x	x	x*	x*	x*	x

The following table reflects the alignment of the actions and sub-themes of the Impact, Risk and Opportunity (IRO) analysis, as well as in the answers to *indicator E2-3-22*, through the objectives they pursue.

	E2		
	Water	Air	Ground
Reduction of energy consumption intensity		x	
Reduction of direct GHG emissions (Scope 1)		x	
Reduction of indirect GHG emissions (scope 2)		x	
Reduction of direct and indirect GHG emissions intensity (scope 1+ 2)		x	
Reduction of the total amount of waste generated and not recycled	x	x	x
Reduce water withdrawal intensity	x		
Overall Net-Zero target	x	x	x
Short-medium term reduction targets scope 1 + 2		x	
Short-medium term targets for reduction of scope 3	x	x	x
Certification according to ISO 14001	x	x	x

E2-2-19 a), b) and c) AR 14	*In addition to ESRS 2 MDR-A, the undertaking may specify to which layer in the following mitigation hierarchy an action and resources can be allocated:* ***(a) avoid pollution including any phase out of materials or compounds that have a negative impact (prevention of pollution at source); (b) reduce pollution, including: any phase-out of materials or compounds; meeting enforcement requirements such as Best Available Techniques (BAT) requirements; or meeting the Do No Significant Harm criteria for pollution prevention and control according to the EU Taxonomy Regulation and its Delegated Acts (minimisation of pollution); and (c) restore, regenerate and transform ecosystems where pollution has occurred (control of the impacts both from regular activities and incidents).***

Action	**CIE Automotive's integrated management model**
Levels of allocation of the action	(a) avoid pollution including phasing out materials or compounds that have a negative impact (prevention of pollution at source); (b) reduce pollution, including: any phase-out of materials or compounds; meeting enforcement requirements such as Best Available Techniques (BAT) requirements; or meeting the Do No Significant Harm criteria for pollution prevention and control according to the EU Taxonomy Regulation and its Delegated Acts (minimisation of pollution); and (c) restore, regenerate and transform ecosystems where pollution has occurred (control of the impacts both from regular activities and incidents).

Action	**Implementation of an environmental management system**
Levels of allocation of the action	(a) avoid pollution including phasing out materials or compounds that have a negative impact (prevention of pollution at source); (b) reduce pollution, including: any phase-out of materials or compounds; meeting enforcement requirements such as Best Available Techniques (BAT) requirements; or meeting the Do No Significant Harm criteria for pollution prevention and control according to the EU Taxonomy Regulation and its Delegated Acts (minimisation of pollution); and (c) restore, regenerate and transform ecosystems where pollution has occurred (control of the impacts both from regular activities and incidents).

Action	Eco-design
Levels of allocation of the action	(a) avoid pollution including phasing out materials or compounds that have a negative impact (prevention of pollution at source); (b) reduce pollution, including: any phase-out of materials or compounds; meeting enforcement requirements such as Best Available Techniques (BAT) requirements; or meeting the Do No Significant Harm criteria for pollution prevention and control according to the EU Taxonomy Regulation and its Delegated Acts (minimisation of pollution);

Action	Durability
Levels of allocation of the action	(a) avoid pollution including phasing out materials or compounds that have a negative impact (prevention of pollution at source); (b) reduce pollution, including: any phase-out of materials or compounds; meeting enforcement requirements such as Best Available Techniques (BAT) requirements; or meeting the Do No Significant Harm criteria for pollution prevention and control according to the EU Taxonomy Regulation and its Delegated Acts (minimisation of pollution);

Action	Repairability, reusability and end-of-life of vehicles
Levels of allocation of the action	(a) avoid pollution including phasing out materials or compounds that have a negative impact (prevention of pollution at source); (b) reduce pollution, including: any phase-out of materials or compounds; meeting enforcement requirements such as Best Available Techniques (BAT) requirements; or meeting the Do No Significant Harm criteria for pollution prevention and control according to the EU Taxonomy Regulation and its Delegated Acts (minimisation of pollution);

Action	Active listening
Levels of allocation of the action	(a) avoid pollution including any phase out of materials or compounds that have a negative impact (prevention of pollution at source); (b) reduce pollution, including: any phase-out of materials or compounds; meeting enforcement requirements such as Best Available Techniques (BAT) requirements; or meeting the Do No Significant Harm criteria for pollution prevention and control according to the EU Taxonomy Regulation and its Delegated Acts (minimisation of pollution)

Action	Governance and involvement of senior management
Levels of allocation of the action	(a) avoid pollution including any phase out of materials or compounds that have a negative impact (prevention of pollution at source); (b) reduce pollution, including: any phase-out of materials or compounds; meeting enforcement requirements such as Best Available Techniques (BAT) requirements; or meeting the Do No Significant Harm criteria for pollution prevention and control according to the EU Taxonomy Regulation and its Delegated Acts (minimisation of pollution); and (c) restore, regenerate and transform ecosystems where pollution has occurred (control of the impacts both from regular activities and incidents).

2.3.2 Metrics and targets

2.3.2.1 DR E2-3: Pollution-related targets

E2-3-22 *AR 19*	*The description of targets shall contain the information requirements defined in ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets.*

In the analysis of the IROs, there are several linked to the emissions of the various scopes, which is why part of the objectives have already been detailed as a response to *E1-4-32*, and are described again below

Objective	**Reduction of direct (Scope 1) GHG emissions**
Description	Reflects the company's commitment to reducing emissions from the direct use of non-renewable fuels.
Target level	Absolute objective. This is calculated as the sum of all the company's Scope 1 emissions in the year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	The reduction compared to 2021 was 11.58%, meaning that the target was successfully achieved.

Objective	**Reduction of indirect (Scope 2) GHG emissions**
Description	Reflects the company's commitment to reducing emissions from indirect use of non-renewable energies.
Target level	Absolute objective. This is calculated as the sum of all the company's Scope 2 emissions in the year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	The reduction compared to 2021 was 34.82%, meaning that the target was successfully achieved.

Objective	**Reduction of intensity of direct and indirect (Scopes 1+2) GHG emissions**
Description	Reflects the company's commitment to reducing emissions from direct and indirect use of non-renewable energies.
Target level	Intensity target for sales. This is calculated by dividing the company's total Scope 1 and Scope 2 emissions from the year by its sales in the year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	It is progressing positively, as the reduction compared to 2021 has been 29.68%, meaning that the target has been satisfactorily achieved.

Objective	**Overall Net-Zero target**
Description	Meet the net-zero target for greenhouse gas emissions across the Value Chain by 2050.
Target level	Absolute target, in line with SBTi requirements, to achieve Net-Zero throughout the company by 2050 at the latest.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2050
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement and the net-zero strategy.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	No significant variations.
Performance	Most of the reduction is expected from 2030 onwards when the use phase will be decarbonised and lower emitting materials will become competitively available in all regions .

Objective	**Short/medium-term range reduction of scopes 1 + 2**
Description	Short- to medium-term targets: to reduce its absolute Scope 1 and 2 GHG emissions by 57.9% by 2033 from base year 2021.
Target level	Absolute objective. Calculated as the sum of Scope 1 and Scope 2 emissions according to the GHG protocol.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2033
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	No significant variations.
Performance	It is progressing positively, as the reduction compared to 2021 has been 29.68%.

Objective	**Short/medium-term range reduction of scope 3**
Description	Short- to medium-term objectives: CIE Automotive is committed to reducing its absolute Scope 3 GHG emissions by 54.6% by 2033 from 2021 as a base year.
Target level	Absolute objective. Calculated as total Scope 3 emissions according to the GHG protocol.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2033
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	No significant variations.
Performance	Scope 3 depends heavily on the sector's electrification ratio. This point is up to our customers and is currently influenced by various drivers that can either accelerate or slow down the pace of electrification.

In addition to the more focused emission targets, targets have also been set that are indirectly related to emissions, such as energy consumption, which also has an impact on the rest of the pollution risks by setting a target for more efficient use of the resources available and therefore has an impact on the other pollution risks:

Objective	**Reduce intensity of energy consumption**
Description	The aim is to make more efficient use of the energy resources consumed by the company as set out in the environmental policy.
Target level	Intensity target for sales. This is calculated by dividing the company's energy consumption by its annual sales.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021-2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	The reduction compared to 2021 was 18.71%, meaning that the target was successfully achieved.

Similarly, objectives were also discussed in the corresponding section on water:

Objective	**Reduce the intensity of water abstraction**
Description	Reflects the company's commitment to reducing water consumption.
Target level	Intensity target for sales. The total volume of water extracted by the company in a year divided by its sales in that year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021-2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Focuses on reducing and mitigating one of the risks identified in the company's IRO analysis.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	Due to increased production and production requirements in Asian plants, the established target has not been met by a narrow margin, with a reduction of 7.21% compared to 2021. Efforts in this area will be stepped up to redirect and improve results.

As waste is an important part of the company's potential impact, a related target has also been set. This target was not detailed as a response to indicator *E1-4-32*.

Objective	**Decrease the total amount of waste generated and not recycled**
Description	Reflects the company's commitment to reducing the impact of waste generated.
Target level	Absolute objective. Total weight of waste not sent for recycling or reuse in a year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021-2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aimed at reducing Scope 3 emissions.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	The disruption of the supply chain in the field of foundry sand recycling has led to an increase in the generation of non-recyclable waste. As it has not been possible to rebuild this supply chain, the target set has not been achieved, with an improvement of only 0.14% compared to the 2021 values.

Lastly, associated with system control and standardisation, the objective is to certify the group's plants in accordance with ISO 14001:

Objective	**ISO 14001 certification**
Description	As part of its management model, CIE Automotive's environmental management system guarantees the analysis of risks and opportunities at local level and their improvement and mitigation plan, using metrics and measuring their impact and effectiveness. Additionally, the certification body is global so that any deviations can be tracked more closely, compliance with the Management Model can be better ensured, and the lessons learned and best practices can be optimally applied horizontally.
Target level	Absolute objective.
Scope	The whole Group.
Base year	2021
Period	2021-2025
Hypothesis	The hypotheses and assumptions are those set out in the risk assessment.
Scientific evidence	It is widely accepted that implementing environmental management systems helps organisations improve their environmental performance, also in the area of pollution. They help them identify risks and opportunities and establish action plans to mitigate risks, exploit opportunities and measure their effectiveness.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections. The concept of the standard is based on a value chain concept.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained. It is true that the certification process for plants joining the group or *green fields* takes 15 to 24 months.
Performance	The target has been achieved, with the exception of ISO 14001 certification for two recently commissioned plants. These two plants have not obtained ISO 14001

	certification because the deadlines indicated in the 'variations' section have not been met. Once the established deadlines have been met, the plants will be certified.

The alignment of the objectives and sub-topics of the IRO analysis are shown below:

	E2		
	Water	Air	Soil
Reduce intensity of energy consumption		x	
Reduction of direct (Scope 1) GHG emissions		x	
Reduction of indirect (Scope 2) GHG emissions		x	
Reduction of intensity of direct and indirect (Scopes 1+2) GHG emissions		x	
Decrease the total amount of waste generated and not recycled	x	x	x
Reduce the intensity of water abstraction	x		
Overall Net-Zero target	x	x	x
Short/medium-term range reduction of scopes 1 + 2		x	
Short/medium-term range reduction of scope 3	x	x	x
ISO 14001 certification	x	x	x

E2-3-23 a)	*The disclosure required by paragraph 20 shall indicate whether and how its targets relate to the prevention and control of:* ***(a) air pollutants and their respective specific loads.***

One of the impacts detected is GHG emissions and their influence on air pollution. Therefore, the objectives of the first block have a direct impact on this point. In addition, an integrated environmental management model based on the ISO 14001 standard has a direct impact on reducing air pollution impacts.

On the other hand, more efficient use of energy results in lower impacts arising from different parts of the value chain.

E2-3-23 b)	*The disclosure required by paragraph 20 shall indicate whether and how its targets relate to the prevention and control of:* ***(b) emissions to water and respective specific loads****.*

One of the objectives is to reduce water extraction and thus make more efficient use of water resources with fewer water discharges. In addition, an integrated environmental management model based on the ISO 14001 standard has a direct impact on reducing water pollution impacts.

On the other hand, more efficient use of energy results in lower impacts arising from different parts of the value chain.

E2-3-23 c)	*The disclosure required by paragraph 20 shall indicate whether and how its targets relate to the prevention and control of:* ***(c) pollution to soil and respective specific loads.***

The aim of reducing waste generation results in a reduced risk of impact on soils. In addition, an integrated environmental management model based on the ISO 14001 standard has a direct impact on reducing soil pollution impacts.

On the other hand, more efficient use of energy results in lower impacts arising from different parts of the value chain.

E2-3-25	*The undertaking shall specify as part of the contextual information, whether the targets it has set and presented are mandatory (required by legislation) or voluntary.*

The targets included in response to *E2-3–22* are voluntary, although obtaining ISO 14001 certification and complying with the Group's policy requires compliance with all mandatory objectives and requirements at each plant.

2.3.2.2 DR E2-4: Air pollution

E2-4-28 a) *AR 21 and 22*	*The undertaking shall disclose the amounts of:* ***(a) each pollutant listed in Annex II of Regulation (EC) No 166/2006 of the European Parliament and of the Council (European Pollutant Release and Transfer Register "E-PRTR Regulation") emitted to air, water and soil, with the exception of emissions of GHGs which are disclosed in accordance with ESRS E1 Climate Change.***

With regard to pollution control, it should be noted that 98% of the Group's plants have an Environmental Management System certified according to ISO 14001, which helps to identify and control their significant environmental aspects. Through this system, the facilities apply continuous improvements in pollution prevention and control to comply with local requirements.

In the case of CIE Automotive, soil pollution is not material to our own operations but to our upstream value chain. With regard to the quantities of air and water pollutants, each local area has criteria and measurement methods that make it impossible to compare data between the Group's different plants. For this reason, and to ensure the consistency of the information, the analysis has focused on plants that have an integrated environmental authorisation. The analysis concludes that the emissions of pollutants associated with these facilities (e.g. CO, NOx and COVDM as air pollutants and nitrogen and heavy metals as water pollutants) do not exceed the thresholds set out in Annex II to Regulation (EC) No 166/2006. Consequently, and in accordance with the requirements of datapoint 29, no quantitative information on emissions is reported, as the consolidation obligation only applies when the aforementioned thresholds are exceeded.

Finally, it should be noted that in 2025 a sectoral working group was set up in collaboration with the Basque EcoDesign Centre, promoted by the Basque Government's Public Environmental Management Company (IHOBE), of which CIE Automotive is a member. The aim of this working group is to improve the process of data collection and reporting with regard to air, water and soil pollution.

E2-4-28 b) *AR 20*	*The undertaking shall disclose the amounts of:* ***(b) microplastics generated or used by the undertaking.***

With the amendment of European regulations on the prevention, reduction and control of microplastic emissions, both intentional and unintentional, a study has been launched to analyse the impact of microplastics on the group's companies. This study aims to identify, assess and manage the risks and opportunities associated with these substances in the event that the regulations become applicable.

E2-4-30 a)	*The undertaking shall put its disclosure into context and describe:* ***(a) the changes over time.***

As detailed in datapoint *E2-4-28 a)*, annual analyses confirm that emissions remain below the thresholds published in Annex II of Regulation (EC) No 166/2006.

E2-4-30 b) *AR 26 and 27*	*The undertaking shall put its disclosure into context and describe:* ***(b) the measurement methodologies.***

The methodologies used for pollutant measurements are diverse, in accordance with local legislation and adapted to the activity of each plant. In plants that have specific emissions sources (those where emissions are channelled through ducts), measurements are carried out in accordance with local legislation, such as those required under the E-PRTR Regulation.

These measurements are usually periodic and are taken on days that are representative of the activity. They are taken on days when the scheduled activity is sufficiently representative of the usual activity, so that measurements can be made that reflect reality as closely as possible. Several measurements are made and are verified by an auditor, and the final values are obtained by extrapolation.

E2-4-30 c) *AR 27*	*The undertaking shall put its disclosure into context and describe* ***(c) the process(es) to collect data for pollution -related accounting and reporting, including the type of data needed and the information sources.***

In order to collect data on emissions, each of the plants that make up CIE Automotive has been required to fill in a form indicating which pollutants they emit and in what quantities. The plants report the data in kg/year, indicating whether their reported emissions are for air/atmosphere, water or soil. This form is integrated into the sustainability tool used by the company.

In a subsequent step, the responses from each plant are collected in a table format that compiles emissions, differentiating between air, water and soil emissions. A new table with the same characteristics is then generated, in which the responses from the plants are added together.

E2-4-31 *AR 27*	*When an inferior methodology compared to direct measurement of emissions is chosen to quantify emissions, the reasons for choosing this inferior methodology shall be outlined by the undertaking. If the undertaking uses estimates, it shall disclose the standard, sectoral study or sources which form the basis of its estimates, as well as the possible degree of uncertainty and the range of estimates reflecting the measurement uncertainty.*

The measurements are taken periodically because the conditions under which the measurements are taken are considered to be representative, which allows an appropriate extrapolation to be made in terms of annual emissions.

The measurement methodology is supported by the methodology required by the integrated environmental authorisation for each plant and that corresponding to its activity. In all cases, the measurements are taken on days when the activity to be analysed is representative of normal activity. In this way, the extrapolation of the measurements to the whole year provides the reality for the year. These measurements are carried out by external measurement companies and verified by an auditor.

2.3.2.3 DR E2-6: Anticipated financial effects from pollution-related impacts, risks and opportunities

E2-6-39 a) *AR 32 and 34*	*The disclosure shall include:* ***(a) a quantification of the anticipated financial effects in monetary terms before considering pollution-related actions, or where not possible without undue cost or effort, qualitative information. For financial effects arising from opportunities, a quantification is not required if it would result in disclosure that does not meet the qualitative characteristics of information (see ESRS 1 Appendix B Qualitative characteristics of information)***

In this second year of implementation of the directive, no information shall be reported regarding a quantification of the anticipated financial effects in monetary terms before considering actions related to pollution, or, when this is not possible without undue cost or effort, qualitative information. For financial effects derived from opportunities, quantification is not required if it would result in disclosure that does not meet the qualitative characteristics of information (see ESRS 1 Appendix B Qualitative Characteristics of Information), due to the application of Delegated Regulation 2025/1416 ('quick fix') published in the OJEU on 10 November 2025, which amends the delegated regulation adopting the ESRS, in particular, for first-phase companies, it freezes and delays the application of the transitional provisions by two years.

As stated under *ESRS 2- SBM-3 –19 c)*, the pollution risks have come out with a risk level of less than 2 on a scale of 5 for the 2050 time horizon and the Net Zero Emissions scenario (the worst-case scenario).

This process, detailed above, is based on surveys of key people in the organisation at the plant, regional and technology level. This procedure calculates the percentage of EBITDA and amount of revenues at risk. The level of risk is low and, accordingly, the potentially affected revenues are immaterial and none of CIE Automotive's targets or commitments are jeopardised.

2.4 Water and marine resources (ESRS E3)

2.4.1 Management of impacts, risks and opportunities

2.4.1.1 DR related to ESRS 2 IRO-1: Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

E3-IRO-1-8 a) *AR 1 and 15*	*The undertaking shall describe the process to identify material impacts, risks and opportunities, and shall provide information on:* ***(a) whether and how the undertaking it has screened its assets and activities in order to identify its actual and potential water and marine resources-related impacts, risks and opportunities in its own operations and its upstream and downstream value chain, and if so the methodologies, assumptions and tools used in the screening;***

As stated in the response to *ESRS 2 – SBM-3- 19 b) AR 7a AR 7b and 7c and AR 13*, there is a single process for determining the material impacts, risks and opportunities related to the environmental area is unique and carried out every two years.

One of the reasons for pursuing a single analysis model is the high-level integration with the overall process (ESRS E1) which is described in *ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities*.

Of course, this process can be seen to be integrated with the overall analysis of impacts, risks and opportunities (IROs) included as the response to *ESRS 2 IRO-1*, whose part in the overall impacts risks and opportunities arising from water and marine resources are shown below.

Impacts, Risks and Opportunities (IROs)

+: positive impact // -: negative impact // R: risk // O: opportunity

Subtopics	IROs
Water	(R) Financial impacts arising from: Decrease in the volume and quality of water sources near the plants due to the intensive use of this resource, especially in industrial processes that require processing materials at high temperatures.
	(R) Financial impacts arising from: Increased water consumption due to increased production of products linked to water-intensive technologies.

E3-IRO-1-8 b) *AR 1 and 15*	*The undertaking shall describe the process to identify material impacts, risks and opportunities, and shall provide information on:* ***(b) whether and how the undertaking has conducted consultations, in particular, with affected communities.***

The overall process followed to identify and assess the impacts, risks and opportunities related to water and marine resources, as well as whether consultations were carried out, are described under *ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities*.

The entire environmental domain, in particular the risk, opportunity and resilience analysis process, is included and explained under the preceding indicator *ESRS 2-SBM-3-19 a)* and *b)* above.

2.4.1.2 DR E3-1: Policies related to water and marine resources

Title	**Environmental policy**
Description	CIE Automotive Group's environmental policy.
Objective	The purpose of this policy is to integrate environmental practices throughout the Value Chain. Doing this will contribute to achieving the United Nations Sustainable Development Goals (SDGs) and ensure transparency in the reporting on our environmental performance. The commitments in this policy are articulated as a key tool to achieve the group's goal of being a net zero emissions company by 2050 and the 1.5ºC target aligned with the Paris Agreement, in addition to its legal commitments and those of its stakeholders. As a leading global multi-technology supplier to the automotive industry, CIE Automotive has a clear commitment to sustainable development, the environment, biodiversity and the fight against climate change. We also recognise our responsibility to minimise the environmental impact of our activities, products and services, in line with the principles of sustainability and current legislation, our stakeholders' requirements and the voluntary commitments undertaken by the company. This commitment is reflected in our Environmental Policy, which guides our strategic and operational decisions towards a more sustainable business model.
Material Impacts, Risks and Opportunities	As part of the continuous reviews of the Strategic Plan, the Management Plan and the potential Transition Plan, the dependencies, impacts, risks and opportunities are assessed to ensure that the risks are mitigated and the opportunities are taken advantage of. For the environmental risks, at minimum, any acute physical, chronic physical and transitional climate risks will be addressed and risk analyses of pollution, circularity, water and biodiversity will be launched. The risk map is integrated into CIE Automotive's Risk Management System (RMS), which follows the ISO 31000 methodology and provides reasonable assurance that all significant environmental risks are prevented, identified, assessed and monitored on an ongoing basis. These risks are approved by the Board and managed according to risk tolerance levels. The Environmental Policy forms part of the company's governance process, along with the dual materiality analysis and the IROs identified in it. The policy therefore addresses the material IROs of the above analysis, and this is also reflected in the response to *ESRS 2-SBM-3-19 a), E1-2-25* and *E5-3-23*.
Scope of the policy	The scope of this policy covers all of CIE Automotive's subsidiaries and affiliates where the company exercises financial and operational control. There are no geographical or technological exclusions. This policy has also been established to allow monitoring of the supply chain, to ensure that all its participants have commitments in line with those of the company; and to manage information security when the products sold are being developed and manufactured. The Group's environmental policy addresses prevention, preparation for reuse, recycling, energy recovery and disposal of the waste, prioritising them in that order. Similarly, waste avoidance or minimisation is prioritised over waste treatment.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	This policy applies globally.
Value Chain	The policy includes a commitment to promote and require environmental commitments in line with those of the company throughout the Value Chain.
Body responsible for implementation	CIE Automotive's Board, through its Audit Committee, is ultimately responsible for the existence and application of this policy. The ESG Committee will oversee the implementation of this policy and ensure it is aligned with the strategic and regulatory goals, with the support of the CEO, who in turn will be supported by the corporate Engineering, Quality and Environment Department and the Horizontal ESG Committee.
Publication	Public document posted on the corporate website, and available to all Group employees through the corporate intranet and the Management Model.

The response to *E2-3-22* discussed the importance of implementing integrated management systems, and more specifically for them to include environmental management systems (EMS) and how to ensure their effectiveness and continuous improvement.

At this point it should be emphasised that these ISO 14001 based systems ensure a value chain and stakeholder focus with key points of the value chain being ensured via internal audits and third-party audits.

Some of these key points of the EMS, where the Environmental Policy is a key point and focus of this audit and review process, are:

1. Organisational context and stakeholder analysis

The standard states that the organisation must:

- Identify relevant stakeholders (customers, suppliers, contractors, regulators, community, etc.) and understand their needs and expectations related to environmental performance.
- Incorporate these expectations into the environmental management system, to ensure that stakeholders' concerns are taken into account.

2. Value chain management

The ISO 14001 standard includes a clear focus on the value chain, ensuring that environmental impacts are not just limited to internal operations, but are considered at all stages, such as:

- Supply of raw materials: Promote purchases of materials from suppliers that comply with environmental requirements.
- Design of products and services: Promote a life-cycle approach, considering environmental impacts from the extraction of raw materials to the end of the product's useful life.
- Management of suppliers and contractors: The standard requires organisations to establish environmental requirements for their suppliers and subcontractors. This may include contractual clauses, audits and training programmes.

3. Product life cycle (life cycle approach)

The ISO 14001 standard incorporates the concept of "life cycle", which means that organisations must assess and minimise environmental impacts at all stages of their value chain:

- Extraction of raw materials.
- Production/distribution.
- Product use.
- Final disposal or recycling.

This obliges the organisation to work closely with its partners in its value chain to identify and manage environmental impacts at each stage.

4. Communication with stakeholders

The standard promotes effective communication with internal and external stakeholders to:

- Report on environmental performance and risk management.
- Encourage collaboration with partners, suppliers and customers on environmental initiatives.
- Strengthen transparency and trust with the community and other stakeholders.

E3 – 1 – 12 a) *AR 16 and 18*	*The undertaking shall indicate whether and how its policies address the following matters where material*: ***(a) water management including:*** ***i. the use and sourcing of water and marine resources in its own operations;*** ***ii. water treatment as a step towards more sustainable sourcing of water; and*** ***iii. the prevention and abatement of water pollution resulting from its activities****.*

The group's environmental policy includes these aspects and commitments, among others:

1. Mandatory and voluntary compliance

We ensure compliance with all applicable environmental legislation, stakeholder requirements and voluntary commitments, ensuring transparent and documented environmental management.

2. The fight against climate change. Incorporating strategies of:

- Climate change mitigation.
- Climate change adaptation.

3. Preservation of air, soil and water quality

- Pollution prevention: Soil, Water, Air and Noise.
- Reduction of the acoustic impact of our activities.
- Location of our production plants, avoiding deforestation and impacts on biodiversity.

4. Energy Efficiency and Reducing Emissions

- We promote energy efficiency in our operations by implementing clean technologies and transitioning to renewable energy sources.
- We are committed to progressively reducing our greenhouse gas (GHG) emissions, aligning ourselves with the objectives of the Paris Agreement.

5. Management of Resources and Waste

- We optimise the use of materials in our production processes, prioritising recycled and sustainable raw materials.
- We implement circular economy practices, minimising waste generation and maximising reuse or recycling.

6. Design of Sustainable Products and Processes under Eco-design concepts

We incorporate sustainability principles into the design of our components, their manufacturing process and their life cycle, including:

- Lightweight and recyclable materials that improve fuel efficiency.
- Products designed for easy repair, reuse or recycling.
- Circularity of materials.
- Efficient and sustainable processes.
- Ensuring the safety of our products throughout the value chain and in their end use.

7. Protection of Biodiversity and Responsible Use of water resources

- We conduct environmental impact assessments of our facilities to minimise disruption to local ecosystems.
- We manage our water use responsibly, reducing consumption and guaranteeing the quality of the water we discharge. Including:
  - The use and sourcing of water resources in our own operations
  - Water treatment as a step towards more sustainable water use.
  - Prevention and abatement of water pollution resulting from our activities.
- Protecting water resources, including river and marine resources.

8. Getting people engaged: "we can all improve our environment"

9. Promoting and requiring environmental commitments in line with those of the company throughout the value chain

10. Prevention and management of accidents and emergency situations, mitigating the negative impact on people and the environment

11. Transparency and Reporting

- We publish annual sustainability reports in accordance with the Corporate Sustainability Reporting Directive (CSRD), providing verifiable data on our environmental actions, targets and results.
- We establish key performance indicators to measure and show our progress.

12. We set targets and measure our performance through the scorecard, with indicators such as:

- Energy efficiency.
- Reducing emissions.
- Water consumption.
- Generation of waste.
- Circularity.
- Use of renewable energy.
- Product safety.
- Accidents and emergencies.

E3 – 1 – 12 b) *AR 16 and 18*	*The undertaking shall indicate whether and how its policies address the following matters where material:* ***(b)product and service design in view of addressing water-related issues and the preservation of marine resources****.*

As stated in items 5 and 6 detailed in the response to *E3-1-12 a) AR 16 and 18* above, the product and service design in view of addressing water-related issues and the preservation of marine resources does take CIE Automotive's policy into account.

E3 – 1 – 12 c) *AR 16 and 18*	*The undertaking shall indicate whether and how its policies address the following matters where material:* ***(c) Commitment to reduce material water consumption in areas at water risk in its own operations and along the upstream and downstream value chain.***

Within the Group's indicators and specific objectives, the policy explicitly expresses the target of reducing water consumption in point 12, as detailed in the response to the previous indicator, *E3-1-12 a) AR 16 and 18.* The policy explicitly mentions that the scope includes areas of high water stress.

E3 – 1 – 13 *AR 16 and 18*	*If at least one of the sites of the undertaking is located in an area of high-water stress and it is not covered by a policy, the undertaking shall state this to be the case and provide reasons for not having adopted such a policy. The undertaking may disclose a timeframe in which it aims to adopt such a policy.*

CIE Automotive's Environmental Policy is global in scope, so there is no location with high water stress that it does not cover.

2.4.1.3 DR E3-2: Actions and resources related to water and marine resources

E3 – 2 – 17 *AR 16 and 18*	*The description of the actions and resources shall follow the principles defined in ESRS 2 MDR-A Actions and resources in relation to material sustainability matters. In addition to ESRS 2 MDR-A, the undertaking may specify which layer in the mitigation hierarchy an action and resources can be allocated to*

Due to the integrated approach of CIE Automotive's management system that includes environmental issues, and the dependencies between key factors such as climate change, pollution and water and marine resource management, part of the actions have already been mentioned in response to *E2-2–18.*

Action	**CIE Automotive's integrated management model**
Results	Ensure the Group's best practices are implemented at all CIE Automotive locations, seeking continuous improvement and reduction of impacts on the environment, soil, air and water, along with appropriate use of water and marine resources.
Scope	The entire Group, including areas of high water stress and getting the value chain involved.
Horizon	Continuous improvement every year.
Actions	Elaboration of a Management Model applicable to all the group's plants. This model is strengthened with the best practices detected in any of the locations and with requests transmitted by stakeholders.
Information	To ensure its implementation, both internal and third-party assessments are carried out in accordance with various standards such as ISO 14001 and ISO 50001. By 2025, over 98% of CIE's locations were ISO 14001 certified.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or

	two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Implementation of an environmental management system**
Results	As part of its management model, CIE Automotive's environmental management system guarantees the analysis of risks and opportunities at local level and their improvement and mitigation plan, using metrics and measuring their impact and effectiveness.
Scope	The entire Group, including areas of high water stress and getting the value chain involved.
Horizon	Continuous improvement every year.
Actions	Group requirement for all plants to obtain ISO 14001 certification. Additionally, the certification body is global so that any deviations can be tracked more closely, compliance with the Management Model can be better ensured, and the lessons learned and best practices can be optimally applied horizontally.
Information	The implementation and certification according to ISO 14001 helps reduce the environmental impact in several ways: **1. Identification and Management of Environmental Impacts** ISO 14001 requires organisations to identify aspects of their activities, products or services that affect the environment (such as emissions, resource use, waste generation), and to develop strategies to mitigate them. **2. Legal compliance** The certification ensures that the organisation complies with local, national and international environmental legislation, reducing the risk of sanctions for non-compliance. **3. Efficiency in resource consumption** Implementing ISO 14001 encourages the optimisation of the use of resources such as water, energy and raw materials, which reduces the environmental impact associated with their extraction, production and consumption. **4. Pollution Prevention** The standard incentivises action to prevent pollution, rather than to correct it afterwards. This includes minimising emissions, reducing waste and handling chemicals safely. **5. Promoting continuous improvement** ISO 14001 requires a continual improvement approach, ensuring that organisations regularly implement actions to reduce their long-term environmental impacts. **6. Environmental awareness** The certification promotes awareness and training of employees and stakeholders on sustainable practices, thus fostering a more environmentally responsible organisational culture. **7. Reputation and competitiveness** Certified companies are valued more highly by stakeholders, who prioritise sustainability, promoting environmentally responsible business practices throughout the supply chain. Currently over 98% of the Group's locations are ISO 14001 certified.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Eco-design**
Results	Introduction of eco-design criteria in the process of launching and industrialising new projects, as well as the dissemination of eco-design manuals and tools.
Scope	The entire Group, including areas of high water stress and getting the value chain involved.
Horizon	This has already been introduced into the management system and is updated on a recurring basis to ensure its effectiveness.
Actions	Introduction of eco-design criteria into processes and procedures for developing and launching new products and projects.
Information	CIE Automotive's Process 3 contains a series of checklists that coincide with each step of the Advanced Product Quality Planning (APQP) process, which are reviewed by plant and project management to move on to the next phase, and that incorporate the review of eco-design concepts in the project. Eco-design tools have been developed to help achieve this.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Active listening**
Results	Membership in associations aligned with CIE Automotive's objectives and policy.
Scope	Organisations aligned with eco-design, circularity, climate change, emission reduction and environmental impact reduction objectives, with a special focus on the value chain and stakeholders.
Horizon	This is an action with a long-term horizon.
Actions	Align sector objectives, both downstream and upstream. Promote the objectives reflected in the group's policy and commitments in entities that have difficulties in applying them, such as SMEs in particular. Identify new challenges and trends. Stimulate joint proposals.
Information	At the institutional level, CIE Automotive works through the Board of the Spanish Association of Automotive Suppliers (Sernauto) to promote actions to achieve climate neutrality and collaborates to set more ambitious targets for the sector. The group is a founding member of the Basque Ecodesign Center, where it works together with various government representatives and different industrial sectors to promote circularity, decarbonisation and the fight against climate change. CIE Automotive has been involved in new mobility solutions focused on zero-emission vehicles from the early stages of development. This strategy has led it to participate in Basquevolt since 2021, the Basque initiative for producing solid-state batteries. It also belongs to Forética's Climate Change Cluster [*Clúster del Cambio Climático de Forética*], a group of companies that translates the main trends and conversations on climate change worldwide into the Spanish context. It is also a member of the Spanish Quality Association [*Asociación Española de Calidad*], which has various working groups in the environmental area to influence the development of new legislation and provide guidelines and training to help the industry manage climate change.
Description of associated CapEx and OpEx	No specific CapEx or OpEx is required.

Action	Governance and involvement of senior management
Results	Incorporate environmental and sustainability criteria into all the company's decisions and therefore into its strategy.
Scope	The CIE Automotive Group, including those working in areas of high water stress.
Horizon	This is an action with a long-term horizon.
Actions	Boost interaction between all levels of the company by fostering fluid information and communication.
Information	The Board and the Management Committee are engaged in the fight against climate change. The ultimate responsibility for environment-related activities rests with the Board. Within the Board, the environmental representative is the ESG Committee. The chair of this committee has experience and knowledge regarding climate change. The company's CEO, in turn, is involved in sustainable growth and is ultimately responsible for the achievement of the Strategic Plan, which integrates the ESG Plan. The ESG Committee is a body that reports and makes proposals to CIE Automotive's ESG Committee. The Director of Engineering, Quality and Environment is part of this committee and manages the deployment of the strategic plan in the environmental area. Bringing engineering and environment together under one Director ensures that all the environmental objectives are addressed upstream and at the R&D stage.
Description of associated CapEx and OpEx	No specific CapEx or OpEx is required.

The following two actions are specific and were not mentioned in the previous points:

Action	Increased water recirculation
Results	Reducing water extraction by extending the use of closed loops.
Scope	The entire Group, including areas of high water stress.
Horizon	This is an action with a long-term horizon.
Actions	Increase the use of closed circuits, especially in cooling areas.
Information	The Group's production process is water-intensive. To minimise extraction and discharges, the company has its own systems and facilities for water treatment, recirculation and recovery.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Improving water treatment systems**
Results	Reducing water extraction by extending the use of closed loops.
Scope	Certain plants located in India.
Horizon	2023-2026
Actions	Improvements to pre-discharge water treatment systems.
Information	The Group's production process is water-intensive. To minimise extraction and discharges, the company has its own systems and facilities for water treatment, recirculation and recovery.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established..

One of the foundations of the integrated management system is to close the circle of strategy, policies, actions and objectives or goals by ensuring the processes and actions are effective. To this end, actions are linked to targets or objectives that are continuously reviewed as metrics of the effectiveness of each action and of the system.

It should be recalled that one of the pillars of environmental management systems certified with the ISO 14001 standard is the Plan-Do-Check-Act (PDCA) cycle approach, which ensures continuous improvement:

- **Plan:** Identify environmental aspects, legal requirements and risks/opportunities; define environmental objectives and targets; and establish action plans.
- **Do:** Implement the plans and procedures designed.
- **Check:** Monitor, measure, analyse and evaluate environmental performance against the established objectives.
- **Act:** Correct and adjust the system as necessary to improve its effectiveness.

This pillar is combined with two other key pillars:

Monitor, measure and assess performance

- The standard requires organisations to continuously monitor their environmental performance, assessing whether the objectives and targets are being met.
- Internal audits are a key tool to verify the effectiveness of the system. In the case of CIE Automotive, these are corroborated by third-party certification.

Continuous improvement

The standard encourages continual improvement through periodic reviews of the system, identification of non-conformities and implementation of corrective and preventive actions. This allows the system to constantly progress and become more effective in achieving its goals.

For this purpose, a matrix has been set up to ensure that all the actions are linked to objectives or goals. This is shown in the table below, where the entries identified with an asterisk (*) are those that are mainly involved in the value chain.

		Obj6	Obj13
		Reduce the intensity of water extraction	Certification according to ISO 14.001
Acc1	Substitution of non-renewable fuels		x
Acc2	Purchasing Renewable Electricity	x*	
Acc3	Energy efficiency via Industry 4.0 initiatives		x
Acc4	Reduction of the gross weight to net weight ratio	x*	
Acc5	Circularity projects		x
Acc6	Adaptation of the Azkoitia landfill to current legislation		x
Acc7	Key Product Carbon Footprint Calculation	x	
Acc8	Digitalization Environmental Data Management	x	x
Acc9	Supply Chain Race2Zero Project	x*	x*
Acc10	Project Materials	x*	x*
Acc11	Auxiliary Equipment Project	x*	x*
Acc12	Eco-design	x	x
Acc13	CIE Automotive Integrated Management Model	x	x
Acc14	Implementation of an environmental management system	x	x
Acc15	Durability	x*	x
Acc16	Repairability, reuse and end-of-life of vehicles	x*	x
Acc17	Active listening	x	x
Acc18	Governance and Senior Management Engagement	x	x
Acc19	Increased water circularity	x	x
Acc20	Improvement in water treatment systems	x	x

The following table reflects the alignment of the actions and sub-themes of the Impact, Risk and Opportunity (IRO) analysis, as well as in the response to indicator *E3-3-22* through the objectives they pursue.

	E3
	Water
Reducing the intensity of water abstraction	x
Certification according to ISO 14001	x

E3-2-18 AR 19 and 21	*Resources can be allocated to: (a) avoid the use of water and marine resources; (b) reduce the use of water and marine resources such as through efficiency measures; (c) reclaiming and reuse of water; or (d) restoration and regeneration of aquatic ecosystem and water bodies.*

Action	**CIE Automotive's integrated management model**
Associated with:	*(a) avoid the use of water and marine resources; (b) reduce the use of water and marine resources such as through efficiency measures; (c) reclaiming and reuse of water*

Action	**Implementation of an environmental management system**
Associated with:	*(a) avoid the use of water and marine resources; (b) reduce the use of water and marine resources such as through efficiency measures; (c) reclaiming and reuse of water*

Action	**Ecodesign**
Associated with:	*(a) avoid the use of water and marine resources; (b) reduce the use of water and marine resources such as through efficiency measures; (c) reclaiming and reuse of water*

Action	**Active listening**
Associated with:	*(a) avoid the use of water and marine resources; (b) reduce the use of water and marine resources such as through efficiency measures; (c) reclaiming and reuse of water*

Action	**Governance and involvement of senior management**
Associated with:	*(a) avoid the use of water and marine resources; (b) reduce the use of water and marine resources such as through efficiency measures; (c) reclaiming and reuse of water*

Action	**Increased water recirculation**
Associated with:	*(a) avoiding the use of water and marine resources; (b) reducing the use of water and marine resources, such as through efficiency measures; (c) water recovery and reuse.*

Action	**Improvement of water treatment systems**
Associated with:	*(a) avoiding the use of water and marine resources; (b) reducing the use of water and marine resources, such as through efficiency measures; (c) water recovery and reuse.*

E3-2-19 AR 19 and 21	*The undertaking shall specify actions and resources in relation to areas at water risk, including areas of high-water stress.*

The actions discussed above cover the entire Group, including areas of high-water stress.

2.4.2 Metrics and targets

2.4.2.1 DR E3-3: Targets related to water and marine resources

E3-3-22	*The description of targets shall contain the information requirements defined in ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets.*

In the response to *E2-3-22*, water-related targets were already reflected in the response to *E2-3-22* because of the high dependency between the various environmental domains, including the following:

Objective	**Reduce the intensity of water abstraction**
Description	Reflects the company's commitment to reducing water consumption.
Target level	Intensity target for sales. The total volume of water extracted by the company in a year divided by its sales in that year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021-2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Focuses on reducing and mitigating one of the risks identified in the company's IRO analysis.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	Due to increased production and production requirements in Asian plants, the established target has not been met by a narrow margin, with a reduction of 7.21% compared to 2021. Efforts in this area will be stepped up to redirect and improve results.

Objective	**ISO 14001 certification**
Description	As part of its management model, CIE Automotive's environmental management system guarantees the analysis of risks and opportunities at local level and their improvement and mitigation plan, using metrics and measuring their impact and effectiveness. Additionally, the certification body is global so that any deviations can be tracked more closely, compliance with the Management Model can be better ensured, and the lessons learned and best practices can be optimally applied horizontally.
Target level	Absolute objective.
Scope	The whole Group.
Base year	2021
Period	2021-2025
Hypothesis	The hypotheses and assumptions are those set out in the risk assessment.
Scientific evidence	It is widely accepted that implementing environmental management systems helps organisations improve their environmental performance, also in the area of pollution. They help them identify risks and opportunities and establish action plans to mitigate risks, exploit opportunities and measure their effectiveness.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections. The concept of the standard is based on a value chain concept.
Geographical regions	The whole Group.

Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained. It is true that the certification process for plants joining the group or *green fields* takes 15 to 24 months.
Performance	The target has been achieved, with the exception of ISO 14001 certification for two recently commissioned plants. These two plants have not obtained ISO 14001 certification because the deadlines indicated in the 'variations' section have not been met. Once the established deadlines have been met, the plants will be certified.

The alignment of the objectives and sub-topics of the IRO analysis are shown below. In this case both targets affect the water sub-topic and therefore their related actions.

	E3
	Water
Reduce the intensity of water abstraction	x
ISO 14001 certification	x

E3-3-23 a)	*The disclosure required by paragraph 20 (The undertaking shall disclose the water and marine resources-related targets it has set) shall indicate whether and how its targets relate to:* ***(a) the management of material impacts, risks and opportunities related to areas at water risk, including improvement of the water quality.***

As explained in previous indicators, and specifically shown in the response to indicator *E3-3-22*, targets are a measure of the effectiveness of actions taken. These actions arise from the need to mitigate risks or to take advantage of opportunities detected in the analysis of dependencies and IROs carried out. They are therefore aligned within a common, integrated process.

E3-3-23 b)	*The disclosure required by paragraph 20 (The undertaking shall disclose the water and marine resources-related targets it has set) shall indicate whether and how its targets relate to:* ***(b) the responsible management of marine resources impacts, risks and opportunities including the nature and quantity of marine resources-related commodities (such as gravels, deep-sea minerals, seafood) used by the undertaking.***

The use of marine resources such as gravel, deep-sea minerals or shellfish is not relevant to the Group.

E3-3-23 c)	*The disclosure required by paragraph 20 (The undertaking shall disclose the water and marine resources-related targets it has set) shall indicate whether and how its targets relate to:* ***(c) the reduction of water consumption, including an explanation of how those targets relate to areas at water risk, including areas of high water-stress.***

The targets aim at taking a systemic approach to water use by implementing a single management model and third-party certification of the model based on the ISO 14001 standard. It also sets an explicit target for reducing water extraction.

These targets are set for the entire Group and therefore also for locations in areas of high-water stress.

E3-3-25	*The undertaking shall specify as part of the contextual information, whether the targets it has set and presented are mandatory (required by legislation) or voluntary.*

The targets described in response to *E3-3-22* are voluntary, although obtaining ISO 14001 certification and complying with the Group's policy requires compliance with all mandatory objectives and requirements at each plant.

2.4.2.2 DR E3-4: Water consumption

In the variations for 2025 compared to the 2024 reporting period, it should be noted that the following plants acquired by the Group have been added to the data report: CIE Engrecon, CIE Autometal Piracicaba and CIE Metal Norte.

E3-4-28 a)	*The disclosure required by paragraph 26 relates to own operations and shall include: **(a) total water consumption in m3.***

1,796,330.46 m³ in 2025, and 1,671,250.76 m³ in 2024.

E3-4-28 b) AR 28	*The disclosure required by paragraph 26 relates to own operations and shall include: **(b) total water consumption in m3 in areas at water risk, including areas of high-water stress.***

1,096,188.46 m³ in 2025, and 941,423.83 m³ in 2024.

E3-4-28 c)	*The disclosure required by paragraph 26 relates to own operations and shall include: **(c) total water recycled and reused in m3.***

66,927,985.54 m3 in 2025, and 56,011,406.72 m3 in 2024.

E3-4-28 d)	*The disclosure required by paragraph 26 relates to own operations and shall include: **(d) total water stored and changes in storage in m3.***

The total volume of water stored is not significant compared to the Group's water consumption or the volume of water recirculated and reused. Its main function is to act as a reserve for essential services, such as fire protection, certain sanitary processes or operational management in periods of drought, especially in those geographical areas where occasional restrictions may occur.

E3-4-28 e) AR 29	*The disclosure required by paragraph 26 relates to own operations and shall include: **(e) any contextual information necessary regarding points (a) to (d), including the water basins' water quality and quantity, how the data have been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, estimated, modelled, or sourced from direct measurements, and the approach taken for this, such as the use of any sector-specific factors.***

At CIE Automotive, we manage and report our water indicators based on traceable data and standardised procedures that ensure accuracy and alignment with applicable legislation, including the requirements of the Corporate Sustainability Reporting Directive (CSRD).

The methods used are described below:

1. Mains water: The consumption of mains water is recorded directly from the invoices issued by the water company. This approach ensures full traceability of the data, as the information comes from an official auditable source.

2. Well water, surface water and rainwater: The volumes of water taken from wells, surface sources and collected rainwater are measured using meters installed at the catchment or collection points.

- This method provides accurate and verifiable data on the use of these resources.
- The meters undergo regular maintenance to ensure their correct functioning and the reliability of their measurements.

3. Recirculated Water: The volume of recirculated water in our processes is calculated using a method based on:

- The recirculation capacity of the cooling towers, determined by technical specifications.
- The actual hours of operation of the towers, recorded automatically.

E3-4-29	*The undertaking shall provide information on its water intensity: total water consumption in its own operations in m3 per million EUR net revenue.*

In 2025, 0.0005 m3 per million EUR net revenue, whereas in 2024, 0.0004 m3 per million EUR net revenue.

2.4.2.3 DR E3-5: Anticipated financial effects from water and marine resources-related impacts, risks and opportunities

E3-5-33 a) AR 29	*The disclosure shall include: (a) a quantification of the anticipated financial effects in monetary terms before considering water and marine resources-related actions or where not possible without undue cost or effort, qualitative information. For financial effects arising from opportunities, a quantification is not required if it would result in disclosure that does not meet the qualitative characteristics of information (see ESRS 1 Appendix B Qualitative characteristics of information).*

In this second year of implementation of the directive, no information shall be reported regarding a quantification of the anticipated financial effects in monetary terms before considering actions related to water and marine resources or, where this is not possible without undue cost or effort, qualitative information. For financial effects derived from opportunities, quantification is not required if it would result in disclosure that does not meet the qualitative characteristics of information (see ESRS 1 Appendix B Qualitative Characteristics of Information), due to the application of Delegated Regulation 2025/1416 ('quick fix') published in the OJEU on 10 November 2025, which amends the delegated regulation adopting the ESRS, in particular, for first-phase companies, it freezes and delays the application of the transitional provisions by two years.

As stated under *ESRS 2-SBM-3–19 c)* and *E3-IRO-1-8 a)*, the water risks have come out with a risk level of less than 2.05 on a scale of 5 for the 2050 time horizon and the Net Zero Emissions scenario (the worst-case scenario).

This process, detailed above, is based on surveys of key people in the organisation at the plant, regional and technology levels, whereby a percentage of EBITDA at risk is calculated, and as a proportion, the amount of revenue at risk.

The level of risk is low and, accordingly, the potentially affected revenues are immaterial and none of CIE Automotive's targets or commitments are jeopardised.

2.5 Resource use and circular economy (ESRS E5)

2.5.1 Management of impacts, risks and opportunities

2.5.1.1 DR related to ESRS 2 IRO-1: Description of the processes to identify and assess effects from resource use and circular economy-related risks and opportunities

ESRS 2-IRO 1-11 a)	*The undertaking shall describe the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities, and shall provide information on* ***(a) whether the undertaking has screened its site locations and business activities in order to identify its actual and potential pollution -related impacts, risks and opportunities in its own operations and upstream and downstream value chain, and if so, the methodologies, assumptions and tools used in the screening.***

As stated in the response to *ESRS 2 – SBM-3- 19 b) AR 7a AR 7b and 7c and AR 13*, there is a single process for determining the material impacts, risks and opportunities related to the environmental area is unique and carried out every two years.

One of the reasons for pursuing a single analysis model is the high-level integration with the overall process (ESRS E1) which is described in *ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities*.

Of course, this process can be seen to be integrated with the overall analysis of impacts, risks and opportunities (IROs) addressed in the response to *ESRS 2 IRO-1*, whose part in the overall impacts risks and opportunities of resource use and the circular economy are shown below.

Impacts, Risks and Opportunities (IROs)

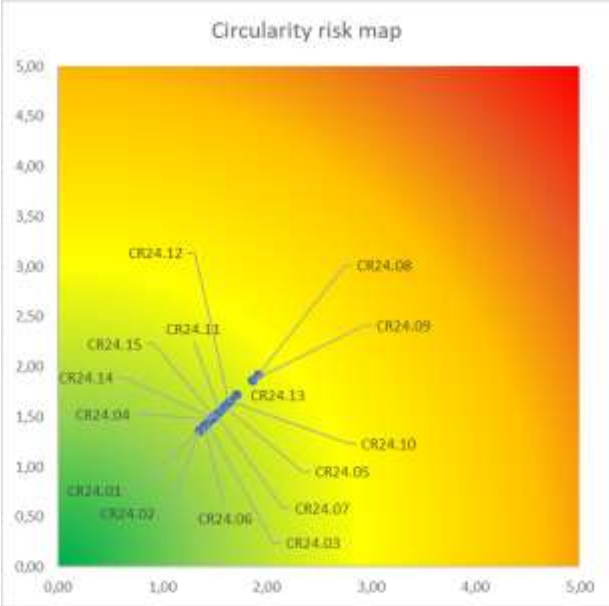
+: positive impact // -: negative impact // R: risk // O: opportunity

Subtopics	IROs
Resource inputs, including resource use	(+) Use of recycled materials in production processes involving aluminium.
	(+) Use of returnable packaging that can be used for other products, thus reducing waste and extending the packages' life cycle.
	(+) Internal reuse of returns from the company's various production processes through its own recycling system.
	(+) Reduction in the volume of materials used in production processes due to a reduction in the gross weight of the products manufactured by the company.
	(O) Financial impacts arising from: Internal reuse of returns from the company's various production processes through its own recycling system.
Resource outflows related to products and services	(+) Development of products under eco-design criteria and with a life cycle approach that improves their reparability, disassembly and separation, and thus increases their recyclability.
	(+) Recirculation of water from high-temperature material processing through internal water treatment systems and facilities.
	(O) Financial impacts arising from: Development of products under eco-design criteria and with a life cycle approach that improves their reparability, disassembly and separation, and thus increases their recyclability.
Waste	(R) Financial impacts arising from: Generation of toxic waste during the process of extracting raw materials.
	(R) Financial impacts arising from: Generation of waste associated with the use of technical plastics.
	(O) Financial impacts arising from: Sale of non-recyclable steel waste to local suppliers for reuse.

For a more detailed analysis of the risks of resource use and circular economy, the following risks are analysed:

- CR24.01Risk of lack of effective recycling.
- CR24.02Risk of not reusing hazardous by-products.
- CR24.03Risk of contaminated materials.
- CR24.04Risk of use of virgin raw materials.
- CR24.05Risk of lack of integration of recycled materials.
- CR24.06Risk of by-products not used for circular economy.
- CR24.07Risk of linear product design.
- CR24.08Risk of suppliers with poor environmental practices.
- CR24.09Risk of environmental footprint from transport.
- CR24.10Risk of using mixed or non-recyclable composite materials.
- CR24.11 Risk of lack of quality standards in recyclable materials.
- CR24.12Risk of pollution from recycling processes.
- CR24.13Risk of high energy consumption for recovery.
- CR24.14Risk of lack of attention to durability and repairability.
- CR24.15Risk of products with toxic substances.

None of these risks reaches a value of 2.15 (medium) on a scale of 5 as shown in the heat map below, where the risk level is shown on the y-axis and the probability on the x-axis. The results are shown for the 2050 time horizon and the NZE scenario.



ESRS 2-IRO 1-11 b)	*The undertaking shall describe the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities, and shall provide information on*: ***b) whether and how the undertaking has conducted consultations, in particular, with affected communities.***

The overall process followed to identify and assess the impacts, risks and opportunities related to resources and the circular economy, as well as whether consultations were carried out, are described under *ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities*. The entire environmental domain, in particular the risk, opportunity and resilience analysis process, is integrated and explained under the preceding indicator *ESRS 2-SBM-3-19 a) and b)* above.

2.5.1.2 DR E5-1: Policies related to resource use and circular economy

E5 –1 - 14	*The disclosure required by paragraph 12 shall contain the information on the policies the undertaking has in place to manage its material impacts, risks and opportunities related to resource use and circular economy in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters.*

Title	**Environmental policy**
Description	CIE Automotive Group's environmental policy.
Objective	The purpose of this policy is to integrate environmental practices throughout the Value Chain. Doing this will contribute to achieving the United Nations Sustainable Development Goals (SDGs), and ensure transparency in the reporting on our environmental performance. The commitments in this policy are articulated as a key tool to achieve the group's goal of being a net zero emissions company by 2050 and the 1.5ºC target aligned with the Paris Agreement, in addition to its legal commitments and those of its stakeholders. As a leading global multi-technology supplier to the automotive industry, CIE Automotive has a clear commitment to sustainable development, the environment, biodiversity and the fight against climate change. We also recognise our responsibility to minimise the environmental impact of our activities, products and services, in line with the principles of sustainability and current legislation, our stakeholders' requirements and the voluntary commitments undertaken by the company. This commitment is reflected in our Environmental Policy, which guides our strategic and operational decisions towards a more sustainable business model.
Material Impacts, Risks and Opportunities	As part of the continuous reviews of the Strategic Plan, the Management Plan and the potential Transition Plan, the dependencies, impacts, risks and opportunities are assessed to ensure that the risks are mitigated and the opportunities are taken advantage of. For the environmental risks, at minimum, any acute physical, chronic physical and transitional climate risks will be addressed and risk analyses of pollution, circularity, water and biodiversity will be launched. The risk map is integrated into CIE Automotive's Risk Management System (RMS), which follows the ISO 31000 methodology and provides reasonable assurance that all significant environmental risks are prevented, identified, assessed and monitored on an ongoing basis. These risks are approved by the Board and managed according to risk tolerance levels. The Environmental Policy forms part of the company's governance process, along with the dual materiality analysis and the IROs identified in it. The policy therefore addresses the material IROs of the above analysis, and this is also reflected in the response to *ESRS 2-SBM-3-19 a), E1-2-25* and *E5-3-23*.
Scope of the policy	The scope of this policy covers all of CIE Automotive's subsidiaries and affiliates where the company exercises financial and operational control. There are no geographical or technological exclusions. This policy has also been established to allow monitoring of the supply chain, to ensure that all its participants have commitments in line with those of the company; and to manage information security when the products sold are being developed and manufactured. The Group's environmental policy addresses prevention, preparation for reuse, recycling, energy recovery and disposal of waste, prioritising them in that order. Similarly, waste avoidance or minimisation is prioritised over waste treatment.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	This policy applies globally.
Value Chain	The policy includes a commitment to promote and require environmental commitments in line with those of the company throughout the Value Chain.
Body responsible for implementation	CIE Automotive's Board, through its Audit Committee, is ultimately responsible for the existence and application of this policy. The ESG Committee will oversee the implementation of this policy and ensure it is aligned with the strategic and regulatory goals, with the support of the CEO, who in turn will be supported by

	the corporate Engineering, Quality and Environment Department and the Horizontal ESG Committee.
Publication	Public document posted on the corporate website, and available to all Group employees through the corporate intranet and the Management Model.

The response to *ESRS E1-3-28* discussed the importance of implementing integrated management systems, and more specifically for them to include environmental management systems (EMS) and how to ensure their effectiveness and continuous improvement.

At this point it should be emphasised that these ISO 14001 based systems ensure a value chain and stakeholder focus with key points of the value chain being ensured via internal audits and third-party audits.

Some of these key points of the EMS, where the Environmental Policy is a key point and focus of this audit and review process, are:

1. Organisational context and stakeholder analysis
The standard states that the organisation must:
- Identify relevant stakeholders (customers, suppliers, contractors, regulators, community, etc.) and understand their needs and expectations related to environmental performance.
- Incorporate these expectations into the environmental management system, to ensure that stakeholders' concerns are taken into account.

2. Value chain management
The ISO 14001 standard includes a clear focus on the value chain, ensuring that environmental impacts are not just limited to internal operations, but are considered at all stages, such as:
- Supply of raw materials: Promote purchases of materials from suppliers that comply with environmental requirements.
- Design of products and services: Promote a life-cycle approach, considering environmental impacts from the extraction of raw materials to the end of the product's useful life.
- Management of suppliers and contractors: The standard requires organisations to establish environmental requirements for their suppliers and subcontractors. This may include contractual clauses, audits and training programmes.

3. Product life cycle (life cycle approach)
The ISO 14001 standard incorporates the concept of "life cycle", which means that organisations must assess and minimise environmental impacts at all stages of their value chain:
- Extraction of raw materials.
- Production/distribution.
- Product use.
- Final disposal or recycling.

This obliges the organisation to work closely with its partners in its value chain to identify and manage environmental impacts at each stage.

4. Communication with stakeholders
The standard promotes effective communication with internal and external stakeholders to:
- Report on environmental performance and risk management.
- Encourage collaboration with partners, suppliers and customers on environmental initiatives.
- Strengthen transparency and trust with the community and other stakeholders.

E5 –1 – 15 a)	*In the summary, the undertaking shall indicate whether and how its policies address the following matters where material:* ***(a) transitioning away from use of virgin resources, including relative increases in use of secondary (recycled) resources***

The group's environmental policy includes these aspects and commitments, among others:

1. Mandatory and voluntary compliance
We ensure compliance with all applicable environmental legislation, stakeholder requirements and voluntary commitments, ensuring transparent and documented environmental management.

2. The fight against climate change. Incorporating strategies of:

- Climate change mitigation.
- Climate change adaptation.

3. Preservation of air, soil and water quality

- Pollution prevention: Soil, Water, Air and Noise.
- Reduction of the acoustic impact of our activities.
- Location of our production plants, avoiding deforestation and impacts on biodiversity.

4. Energy Efficiency and Reducing Emissions

- We promote energy efficiency in our operations by implementing clean technologies and transitioning to renewable energy sources.
- We are committed to progressively reducing our greenhouse gas (GHG) emissions, aligning ourselves with the objectives of the Paris Agreement.

5. Management of Resources and Waste

- We optimise the use of materials in our production processes, prioritising recycled and sustainable raw materials.
- We implement circular economy practices, minimising waste generation and maximising reuse or recycling.

6. Design of Sustainable Products and Processes under Eco-design concepts

We incorporate sustainability principles into the design of our components, their manufacturing process and their life cycle, including:

- Lightweight and recyclable materials that improve fuel efficiency.
- Products designed for easy repair, reuse or recycling.
- Circularity of materials.
- Efficient and sustainable processes.
- Ensuring the safety of our products throughout the value chain and in their end use.

7. Protection of Biodiversity and Responsible Use of water resources

- We conduct environmental impact assessments of our facilities to minimise disruption to local ecosystems.
- We manage our water use responsibly, reducing consumption and guaranteeing the quality of the water we discharge. Including:
    - The use and sourcing of water resources in our own operations.
    - Water treatment as a step towards more sustainable water use.
    - Prevention and abatement of water pollution resulting from our activities.
- Protecting water resources, including river and marine resources.

8. Getting people engaged: "we can all improve our environment"

9. Promoting and requiring environmental commitments in line with those of the company throughout the value chain

10. Prevention and management of accidents and emergency situations, mitigating the negative impact on people and the environment

11. Transparency and Reporting

- We publish annual sustainability reports in accordance with the Corporate Sustainability Reporting Directive (CSRD), providing verifiable data on our environmental actions, targets and results.
- We establish key performance indicators to measure and show our progress.

12. We set targets and measure our performance through the scorecard, with indicators such as:

- Energy efficiency.
- Reducing emissions.
- Water consumption.
- Generation of waste.
- Circularity.
- Use of renewable energy.
- Product safety.
- Accidents and emergencies.

E5 –1 – 15 b) AR 9	*In the summary, the undertaking shall indicate whether and how its policies address the following matters where material:* ***(b) sustainable sourcing and use of renewable resources.***

The response to this indicator is provided under *E5-1-15 a)* and *E5-1-14*, especially in the section on scope.

CIE Automotive has adopted the waste hierarchy as the basis for its environmental management strategy, prioritising the minimisation of negative impacts and following the principles of the circular economy. Our waste policy follows a structured approach based on the following order of priority:

1. Prevent:
- We design our processes to optimise the use of materials, minimising the generation of waste at source.
- We implement continuous improvement initiatives, such as optimising cuts of metal and plastic materials in a way that maximises the use of raw materials.

2. Reuse:
- We encourage the reuse of materials such as returnable packaging and reusable containers in our logistics chains.
- In our plants, we repair equipment and components whenever possible, extending their life cycle.

3. Recycle:
- Separation and integrated waste management to maximise the recycling of materials such as metals, plastics and paper.
- We work with authorised waste managers to ensure that recyclable waste is reintegrated into the value chain as a secondary raw material.

4. Recover:
- We use non-recyclable waste for energy recovery, contributing to the reduction of waste destined for landfill.
- At some facilities, we use organic waste to generate compost or biogas, where local infrastructure allows.

5. Elimination (last option):
- Non-recoverable waste is managed responsibly through authorised landfills, minimising the environmental impact.
- We constantly review these practices to minimise the waste destined for this category.

2.5.1.3 DR E5-2: Actions and resources related to resource use and circular economy

E5–2–19	*The description of the resource use and circular economy-related actions and resources allocated shall follow the principles defined in ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.*

Action	**CIE Automotive's integrated management model**
Results	Ensure the Group's best practices are implemented at all CIE Automotive locations, seeking continuous improvement and reduction of impacts on the environment, soil, air and water, along with appropriate use of water and marine resources
Scope	The entire Group, including areas of high water stress and getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	Continuous improvement every year
Actions	Elaboration of a Management Model applicable to all the group's plants. This model is strengthened with the best practices detected in any of the locations and with requests transmitted by stakeholders.
Information	To ensure its implementation, both internal and third-party assessments are carried out in accordance with various standards such as ISO 14001 and ISO 50001. By 2025, over 98% of CIE's locations were ISO 14001 certified.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company.

	Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Implementation of an environmental management system**
Results	As part of its management model, CIE Automotive's environmental management system guarantees the analysis of risks and opportunities at local level and their improvement and mitigation plan, using metrics and measuring their impact and effectiveness.
Scope	The entire Group, including areas of high water stress and getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	Continuous improvement every year.
Actions	Group requirement for all plants to obtain ISO 14001 certification. Additionally, the certification body is global so that any deviations can be tracked more closely, compliance with the Management Model can be better ensured, and the lessons learned and best practices can be optimally applied horizontally.
Information	The implementation and certification according to ISO 14001 helps reduce the environmental impact in several ways: **1. Identification and Management of Environmental Impacts** ISO 14001 requires organisations to identify aspects of their activities, products or services that affect the environment (such as emissions, resource use, waste generation), and to develop strategies to mitigate them. **2. Legal compliance** The certification ensures that the organisation complies with local, national and international environmental legislation, reducing the risk of sanctions for non-compliance. **3. Efficiency in resource consumption** Implementing ISO 14001 encourages the optimisation of the use of resources such as water, energy and raw materials, which reduces the environmental impact associated with their extraction, production and consumption. **4. Pollution Prevention** The standard incentivises action to prevent pollution, rather than to correct it afterwards. This includes minimising emissions, reducing waste and handling chemicals safely. **5. Promoting continuous improvement** ISO 14001 requires a continual improvement approach, ensuring that organisations regularly implement actions to reduce their long-term environmental impacts. **6. Environmental awareness** The certification promotes awareness and training of employees and stakeholders on sustainable practices, thus fostering a more environmentally responsible organisational culture. **7. Reputation and competitiveness** Certified companies are valued more highly by stakeholders, who prioritise sustainability, promoting environmentally responsible business practices throughout the supply chain. Currently over 98% of the Group's locations are ISO 14001 certified.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or

	two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established. .

Action	**Eco-design**
Results	Introduction of eco-design criteria in the process of launching and industrialising new projects, as well as the dissemination of eco-design manuals and tools.
Scope	The entire Group, including areas of high water stress and getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	This has already been introduced into the management system and is updated on a recurring basis to ensure its effectiveness.
Actions	Introduction of eco-design criteria into the processes and procedures for developing and launching new products and projects.
Information	CIE Automotive's Process 3 contains a series of checklists that coincide with each step of the Advanced Product Quality Planning (APQP) process, which are reviewed by plant and project management to move on to the next phase, and that incorporate the review of eco-design concepts in the project. Eco-design tools have been developed to help achieve this.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Active listening**
Results	Membership in associations aligned with CIE Automotive's objectives and policy.
Scope	Organisations aligned with eco-design, circularity, climate change, emission reduction and environmental impact reduction objectives, with a special focus on the value chain and stakeholders.
Horizon	This is an action with a long-term horizon
Actions	Align sector objectives, both downstream and upstream. Promote the objectives reflected in the group's policy and commitments in entities that have difficulties in applying them, such as SMEs in particular. Identify new challenges and trends. Stimulate joint proposals.
Information	At the institutional level, CIE Automotive works through the Board of the Spanish Association of Automotive Suppliers (Sernauto) to promote actions to achieve climate neutrality and collaborates to set more ambitious targets for the sector. The group is a founding member of the Basque Ecodesign Center, where it works together with various government representatives and different industrial sectors to promote circularity, decarbonisation and the fight against climate change. CIE Automotive has been involved in new mobility solutions focused on zero-emission vehicles from the early stages of development. This strategy has led it to participate in Basquevolt since 2021, the Basque initiative for producing solid-state batteries. It also belongs to Forética's Climate Change Cluster [*Clúster del Cambio Climático de Forética*], a group of companies that translates the main trends and conversations on climate change worldwide into the Spanish context. It is also a member of the Spanish Quality Association [*Asociación Española de Calidad*], which has various working groups in the environmental area to influence the development of new legislation and provide guidelines and training to help the industry manage climate change.

Description of associated CapEx and OpEx	No specific CapEx or OpEx is required.

Action	**Governance and involvement of senior management**
Results	Incorporate environmental and sustainability criteria into all the company's decisions and therefore into its strategy.
Scope	The entire Group, including areas of high water stress.
Horizon	This is an action with a long-term horizon.
Actions	Boost interaction between all levels of the company by fostering fluid information and communication.
Information	The Board and the Management Committee are engaged in the fight against climate change. The ultimate responsibility for environment-related activities rests with the Board. Within the Board, the environmental representative is the ESG Committee. The chair of this committee has experience and knowledge regarding climate change. The company's CEO, in turn, is involved in sustainable growth and is ultimately responsible for the achievement of the Strategic Plan, which integrates the ESG Plan. The ESG Committee is a body that reports and makes proposals to CIE Automotive's ESG Committee. The Director of Engineering, Quality and Environment is part of this committee and manages the deployment of the strategic plan in the environmental area. Bringing engineering and environment together under one Director ensures that all the environmental objectives are addressed upstream and at the R&D stage.
Description of associated CapEx and OpEx	No specific CapEx or OpEx is required.

Action	**Increased water recirculation**
Results	Reducing water extraction by extending the use of closed loops.
Scope	The CIE Automotive Group.
Horizon	This is an action with a long-term horizon.
Actions	Increase the use of closed circuits, especially in cooling areas.
Information	The Group's production process is water-intensive. To minimise extraction and discharges, the company has its own systems and facilities for water treatment, recirculation and recovery.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Improving water treatment systems**
Results	Reducing water extraction by extending the use of closed loops.
Scope	Certain plants located in India.
Horizon	2023-2026
Actions	Improvements to pre-discharge water treatment systems.

Information	The Group's production process is water-intensive. To minimise extraction and discharges, the company has its own systems and facilities for water treatment, recirculation and recovery.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Energy efficiency through Industry 4.0 initiatives**
Results	Scope 1 and 2 emission reductions, within the lines of the Climate Change Adaptation and Mitigation and energy group.
Scope	A guide of recommendations was launched for implementation in the group's plants including this action, getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	The short term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Since 2021, a reduction of 29.68% reduction in Scope 1 and 2 emissions. The engineering department is piloting compliance with this action.
Information	The indicator associated with this action has been successfully completed in 2025 in its first monitoring milestone.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Reduction of gross-weight-to-net-weight ratio**
Results	Scope 1, 2 and 3 emission reductions, within the lines of the Climate Change Adaptation and Mitigation and energy group.
Scope	A guide of recommendations was launched for implementation in the group's plants including this action, getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	The short term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Since 2021, a reduction of 29.68% reduction in Scope 1 and 2 emissions. The engineering department is piloting compliance with this action.
Information	The indicator associated with this action has been successfully completed in 2025 in its first monitoring milestone.

Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Circularity projects**
Results	Reduction of scope 3 emissions, with an impact on the generation of greenhouse gas emissions associated with energy-intensive material production processes, thereby contributing to climate change adaptation and the use of environmentally friendly materials as part of the company's climate change mitigation efforts.
Scope	A guide of recommendations was launched for implementation in the group's plants including this action, getting the value chain involved.
Horizon	The short term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Since 2021, a reduction of 11.85% reduction in Scope 3 emissions.. The engineering department is piloting compliance with this action.
Information	The indicator associated with this action has been successfully completed in 2025 in its second monitoring milestone.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	***Supply Chain Race2Zero* project**
Results	Adaptation and mitigation of climate change in the value chain, within the lines of the Climate Change Adaptation and Mitigation group, in clear alignment with accompanying the company's suppliers in the adoption of environmental management systems, which facilitates traceability and control of ESG data in the upstream value chain.
Scope	Key suppliers to CIE Automotive.
Horizon	The short term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	This project was launched in 2022 and aims to align the objectives and actions of the value chain with those of CIE Automotive and, in turn, with those of its stakeholders.
Information	Scope 3 accounts for the largest percentage of the Group's emissions, with category 1 having the greatest impact, which is why suppliers are key to aligning the entire value chain.
Description of associated CapEx and OpEx	No specific CapEx required. The OpEx is mainly linked to the group's R&D activities and was incorporated into its strategic lines and therefore into the recurrent R&D budget, together with the

	efforts of the purchasing division. As mentioned in Note 20 to the 2025 Consolidated Financial Statements, the OPEX associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Materials Project**
Results	Adaptation and mitigation of climate risks in the use of materials.
Scope	Key materials consumed throughout the Group, getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	The short term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Materials are the group with the greatest impact on CIE Automotive's emissions. This project, in combination with Supply Chain Race2Zero, aims to significantly reduce Scope 3 emissions. Work on the project continues actively. Because CIE Automotive works with different manufacturing technologies, it handles various groups and types of materials. This means that the project's progress is not uniform but rather advances at different rates depending on the type of material. For example, in the case of aluminium, development is progressing more smoothly and without major technical complications, mainly because it is a 100% recyclable material, which facilitates its management and reuse within the process. In contrast, in the area of plastics, progress is more moderate due to the wide variety of materials available and the complexity associated with their recycling, which requires more detailed analysis and specific solutions for each type.
Information	The materials should be analysed from the point of view of sustainability and functionality, especially where they have high mechanical or aesthetic requirements.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Optional Equipment Project**
Results	Climate Change Adaptation and Mitigation.
Scope	A guide of recommendations was launched for implementation in the group's plants including this action, getting the value chain involved.
Horizon	The short term horizon is set for 2025, the medium term for 2033 and the long term for 2050.
Actions	Since 2021, a reduction of 29.68% reduction in Scope 1 and 2 emissions. Improving optional equipment such as compressors and waste heat recovery systems helps reduce energy consumption.
Information	For years, recurring studies have been carried out on the main optional equipment of each plant to see if it is possible to improve its efficiency.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions

	discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Durability**
Results	Increase the robustness of products through design processes with durability prediction and improved life prediction through simulation.
Scope	Products that CIE Automotive helps manufacture or design. Getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	The process of improvement is continuous. However, in recent years, improvements were made to the systematic approach.
Actions	Implementation of design processes that incorporate simulation of events the component may undergo in real life, and correlating them through physical testing to close the design loop.
Information	Durability simulation significantly boosts the robustness of automotive components by making it possible to predict, evaluate and improve their performance under various conditions of use throughout their life cycle. For this purpose, integrating virtual and physical validation is crucial, and can lead to the following improvements or advantages: **1. Early detection of potential malfunctions** - The simulations make it possible to identify weak points or failure-prone areas in components before the physical prototypes are manufactured. - This reduces the risk of problems during physical tests or in actual use of the vehicle. **2. Design optimisation** - The simulation tools help adjust the design parameters, such as geometry, materials and manufacturing processes, to improve the component's robustness to fatigue, vibration and other stresses. - This makes it possible to create more robust designs without the need to oversize the components. **3. Validation under real conditions** - The simulations can replicate real-world conditions of use, such as dynamic loads, thermal variations, corrosion and load/unload cycles. - This ensures that the components maintain their functionality and safety even under adverse conditions. **4. Reduced costs and development time** - By replacing some physical tests with virtual simulations, the costs and development times associated with manufacturing and testing multiple prototypes are minimised. - This allows for faster design iteration and a focus on more robust solutions. **5. Improvements in reliability and safety** - By anticipating the components' limits, the simulations help ensure that they will perform correctly throughout their lifetime, increasing consumer confidence in the quality and safety of the vehicle. **6. Compliance with the law and industry standards** - The durability simulations help ensure that the components meet stringent automotive industry standards, such as those relating to structural fatigue, impacts and vibrations.
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area.

	The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

Action	**Repairability, reusability and end-of-life of vehicles**
Results	Improved component designs to make them easier to repair, reuse, disassemble, recycle and recover at the end of their useful life.
Scope	Products that CIE Automotive helps manufacture or design. Getting the value chain involved. This action also focuses on optimising waste management in line with the waste hierarchy.
Horizon	The process of improvement is continuous. However, in recent years, improvements were made to the systematic approach.
Actions	The requirements that customers indicate with respect to these points in the specifications of their development projects must be taken into account, but in any case, laws such as EU Directives 2000/53/EC and 2005/64/EC seek to promote these points.
Information	**Directive 2000/53/EC on End-of-Life of Vehicles** This directive, also known as the ELV Directive, establishes measures to prevent and reduce the environmental impact of the end-of-life of vehicles. The key points include: - **Design for disassembly and recycling**: Manufacturers should consider, during design and production, the ease of dismantling, re-use and recovery of vehicles. - **Limitation of hazardous substances**: The use of materials such as lead, mercury, cadmium and hexavalent chromium is prohibited in the manufacture of vehicles, with some specific exceptions. - **Reuse and recycling objectives**: New vehicles must be reusable and/or recyclable for at least 85% of their weight, and at least 95% reusable and/or recoverable. **Directive 2005/64/EC on the type-approval of motor vehicles with regard to their reusability** This directive complements the previous one, focusing on the type-approval of motor vehicles with regard to their suitability for re-use, recycling and recovery. It establishes requirements to ensure that vehicles meet the minimum reuse and recycling rates mentioned above. More recently, actions have been promoted that are in line with the "right to repair".
Description of associated CapEx and OpEx	As can be seen from the previous points, the Environmental Management Plan is interwoven into the company's Strategic Plan. This plan already details the EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. This plan incorporates the environmental actions discussed above. The above figures are for the Strategic Plan as a whole, not just for one action or just for the environmental area. The OpEx are mainly related to the Group's R&D activities and have been incorporated into its strategic lines and therefore into its ongoing R&D budget. As mentioned, note 20 to the 2025 Consolidated Financial Statements, the OpEx associated with R&D is immaterial for the company. Given the uncertainty in the automotive market, due to both internal factors such as electrification, new players entering new geographical areas, decarbonisation, etc., and geopolitical factors, this is not the right time to draw up a new long-term plan. During 2026, short-term guidelines (one or two years) will be provided, and when the environment is more suitable, long-term objectives and associated resources will be re-established.

One of the foundations of the integrated management system is to close the circle of strategy, policies, actions and objectives or goals by ensuring the processes and actions are effective. To this end, actions are linked to targets or objectives that are continuously reviewed as metrics of the effectiveness of each action and of the system.

It should be recalled that one of the pillars of environmental management systems certified with the ISO 14001 standard is the Plan-Do-Check-Act (PDCA) cycle approach, which ensures continuous improvement:

- **Plan:** Identify environmental aspects, legal requirements and risks/opportunities; define environmental objectives and targets; and establish action plans.

- **Do:** Implement the plans and procedures designed.
- **Check:** Monitor, measure, analyse and evaluate environmental performance against the established objectives.
- **Act:** Correct and adjust the system as necessary to improve its effectiveness.

This pillar is combined with two other key pillars:

Monitor, measure and assess performance

- The standard requires organisations to continuously monitor their environmental performance, assessing whether the objectives and targets are being met.
- Internal audits are a key tool to verify the effectiveness of the system. In the case of CIE Automotive, these are corroborated by third-party certification.

Continuous improvement

The standard encourages continual improvement through periodic reviews of the system, identification of non-conformities and implementation of corrective and preventive actions. This allows the system to constantly progress and become more effective in achieving its goals.

For this purpose, a matrix has been set up to ensure that all the actions are linked to objectives or goals. This is shown in the table below, where the entries identified with an asterisk (*) are those that are mainly involved in the value chain.

		Obj1	Obj2	Obj3	Obj4	Obj5	Obj6	Obj7	Obj8	Obj9	Obj10	Obj11	Obj12	Obj13
		Reduction of energy consumption intensity	Reduction of direct GHG emissions (scope 1)	Reduction of direct GHG emissions (scope 2)	Reduction in the intensity of direct and indirect GHG emissions (scope 1+2)	Decrease in the total amount of non-recycled waste generated	Reduce the intensity of water extraction	Overall Net-Zero Goal	Short-term-medium-term objectives of scope reduction 1 + 2	Short-term-medium-term scope reduction objectives 3	Improvement of the gross weight-to-net weight ratio	Industry 4.0 Initiatives	Circularity projects	Certification according to ISO 14.001
Acc3	Energy efficiency via Industry 4.0 initiatives	x	x	x	x	x		x	x	x*		x		x
Acc4	Reduction of the gross weight to net weight ratio	x	x	x	x	x	x*	x	x	x	x	x		
Acc5	Circularity projects	x*	x*	x*	x*	x*		x	x*	x			x	x
Acc9	Supply Chain Race2Zero Project	x*	x*	x*	x*	x*	x*	x	x*	x	x*	x*	x*	x*
Acc10	Project Materials	x*	x*	x*	x*	x*	x*	x	x*	x	x*	x*	x*	x*
Acc11	Auxiliary Equipment Project	x	x	x	x		x*	x*	x	x*		x*		x*
Acc13	CIE Automotive Integrated Management Model	x	x	x	x	x	x	x	x	x	x	x	x	x
Acc14	Implementation of an environmental management system	x	x	x	x	x	x	x	x	x	x	x	x	x
Acc15	Durability					x*	x*	x		x		x		x
Acc16	Repairability, reuse and end-of-life of vehicles					x*	x*	x		x		x		x
Acc17	Active listening	x	x	x	x	x	x	x	x	x	x	x	x	x
Acc18	Governance and Senior Management Engagement	x	x	x	x	x	x	x	x	x	x	x	x	x
Acc19	Increased water circularity	x*	x*	x*	x*	x	x	x*	x*	x*				x
Acc20	Improvement in water treatment systems	x*	x*	x*	x*	x	x	x*	x*	x*				x

The following table reflects the alignment of the actions and sub-themes of the Impact, Risk and Opportunity (IRO) analysis, as well as in the answers to *indicator E2-3-22*, through the objectives they pursue.

Objective	**Resource input**	**Resource output**	**Waste**
Decrease in the total amount of waste generated that is not recycled.			x
Reduce water withdrawal intensity			x
Overall Net-Zero target	x	x	x
Short-medium term targets for reduction in scope 3	x	x	x
Improve gross weight to net weight ratio	x	x	x
Industry 4.0 initiatives	x	x	x
Circularity projects	x	x	x
Certification according to ISO 14001	x	x	x

E5–2–20 a)	*In addition to ESRS 2 MDR-A, the undertaking may specify whether and how an action and resources cover:* ***(a) higher levels of resource efficiency in use of technical and biological materials and water, particularly in relation to critical raw materials and rare earths as listed in the Raw Materials Information System.***

The response to this indicator is included under *E5-2-19*.

E5–2–20 b)	*In addition to ESRS 2 MDR-A, the undertaking may specify whether and how an action and resources cover:* ***(b) higher rates of use of secondary raw materials (recyclates).***

The response to this indicator is included under *E5-2-19*, with a special focus on materials, eco-design and the *Supply Chain Race2Zero* project.

E5–2–20 c)	*In addition to ESRS 2 MDR-A, the undertaking may specify whether and how an action and resources cover:* ***(c) application of circular design, leading to increased product durability and optimisation of use, and higher rates of: Reuse, Repair, Refurbishing, Remanufacture, Repurposing and Recycling.***

The response to this indicator is included under *E5-2-19*. This includes actions such as the project to improve gross-weight-to-net-weight ratio, reparability, durability and, as a basis for the whole circular design process, eco-design.

E5–2–20 d)	*In addition to ESRS 2 MDR-A, the undertaking may specify whether and how an action and resources cover:* ***(d) application of circular business practices such as (i) value retention actions (maintenance, repair, refurbishing, remanufacturing, component harvesting, upgrading and reverse logistics, closed loop systems, second-hand retailing), (ii) value maximisation actions (product-service systems, collaborative and sharing economy business models), (iii) end-of-life actions (recycling, upcycling, extended producer responsibility), and (iv) systems efficiency actions (industrial symbiosis).***

The response to this indicator is included under *E5-2-19*.

E5–2–20 e) *AR 13*	*In addition to ESRS 2 MDR-A, the undertaking may specify whether and how an action and resources cover:* ***(e) actions taken to prevent waste generation in the undertaking's upstream and downstream value chain.***

The response to this indicator is included under *E5-2-19*. Here the actions of the *Supply Chain Race2Zero* project should be noted, together with the management model featuring a value chain and life cycle approach.

E5–2–20 f)	*In addition to ESRS 2 MDR-A, the undertaking may specify whether and how an action and resources cover:* ***(f) optimisation of waste management in line with the waste hierarchy.***

The response to this indicator is included under *E5-2-19*. This includes prioritising actions such as the project to improve gross-weight-to-net-weight ratio, reparability and durability, in accordance with the hierarchy established in the point on environmental policy.

This is in addition to the circularity project and an integrated management system based on ISO 14001.

2.5.2 Metrics and targets

2.5.2.1 DR E5-3: Targets related to resource use and the circular economy

E5–3–23	*The description of the targets shall contain the information requirements defined in the ESRS 2 MDR-T. Monitoring the effectiveness of policies and actions through targets.*

Some of the objectives and targets, such as the following, have already been indicated throughout 2024 Consolidated Non-Financial and Sustainability Reporting:

Objective	**Decrease the total amount of waste generated and not recycled**
Description	Reflects the company's commitment to reducing the impact of waste generated.
Target level	Absolute objective. Total weight of waste not sent for recycling or reuse in a year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aimed at reducing Scope 3 emissions.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	The disruption of the supply chain in the field of foundry sand recycling has led to an increase in the generation of non-recyclable waste. As it has not been possible to rebuild this supply chain, the target set has not been achieved, with an improvement of only 0.14% compared to the 2021 values.

Objective	**Reduce the intensity of water abstraction**
Description	Reflects the company's commitment to reducing water consumption.
Target level	Intensity target for sales. The total volume of water extracted by the company in a year divided by its sales in that year.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2021 - 2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Focuses on reducing and mitigating one of the risks identified in the company's IRO analysis.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	Due to increased production and production requirements in Asian plants, the established target has not been met by a narrow margin, with a reduction of 7.21% compared to 2021. Efforts in this area will be stepped up to redirect and improve results.

Objective	**Overall Net-Zero target**
Description	Meet the net-zero target for greenhouse gas emissions across the Value Chain by 2050.
Target level	Absolute target, in line with SBTi requirements, to achieve Net-Zero throughout the company by 2050 at the latest.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2050
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement and the net-zero strategy.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	No significant variations.
Performance	Most of the reduction is expected from 2030 onwards when the use phase will be decarbonised and lower emitting materials will become competitively available in all regions.

Objective	**Short/medium-term range reduction of scope 3**
Description	Short- to medium-term objectives: CIE Automotive is committed to reducing its absolute Scope 3 GHG emissions by 54.6% by 2033 from 2021 as a base year.
Target level	Absolute objective. Calculated as total Scope 3 emissions according to the GHG protocol.
Scope	The entire Group, getting its whole value chain involved.
Base year	2021
Period	2033
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aligned with the 1.5°C strategy of the Paris Agreement.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	No significant variations.
Performance	Scope 3 depends heavily on the sector's electrification ratio. This point is up to our customers and is currently influenced by various drivers that can either accelerate or slow down the pace of electrification.

In addition to these objectives, there are three objectives closely linked to resource efficiency and circularity:

Objective	**Improvement of gross-weight-to-net-weight ratio**
Description	Using less starting material to obtain the same functionality results in less raw material used, less scrap and less waste associated with the manufacturing processes used. On the other hand, processing less material means using fewer energy resources.
Target level	Absolute objective.
Scope	CIE Automotive.
Base year	2021
Period	2021-2025
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.

Scientific evidence	Raw materials have the greatest impact on the company's footprint. In addition, it generates less waste. The aim is to reduce Scope 3 emissions and to a lesser extent Scope 2, by reducing energy use in transformation.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	The improvement project achieved its objectives in 2025.

Objective	**Industry 4.0 initiatives**
Description	The tools that Industry 4.0 provides companies can generate various advantages and, undoubtedly, one of them is improved efficiency and use of the company's resources.
Target level	Absolute objective.
Scope	CIE Automotive and its value chain.
Base year	2021
Period	2021-2024
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	The first step in reducing the impact on Scopes 1 and 2 is to reduce energy use. Efficiency is the key lever. The aim is to reduce Scope 1 and 2 emissions.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	Completed in 2024 with the introduction of initiatives in Europe, Asia and the Americas.

Objective	**Circularity projects**
Description	Product circularity reduces the footprint of products, especially in scope 3.
Target level	Absolute objective.
Scope	CIE Automotive and its value chain.
Base year	2021
Period	2021-2024
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios.
Scientific evidence	Aimed at reducing Scope 3 emissions.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained.
Performance	Introducing circularity strategies into the cycle of a material as crucial as steel, generating more efficient recycling loops in the steel value chain, has improved the efficiency of the circularity of this key product in Europe, Asia and the Americas. Initiatives have also been launched in the field of aluminium and plastics.

The importance of integrated management systems has also been emphasised in other sections, and an objective associated with system control and standardisation was mentioned above, namely the certification of the Group's plants in accordance with ISO 14001:

Objective	**ISO 14001 certification**
Description	As part of its management model, CIE Automotive's environmental management system guarantees the analysis of risks and opportunities at local level and their improvement and mitigation plan, using metrics and measuring their impact and effectiveness. Additionally, the certification body is global so that any deviations can be tracked more closely, compliance with the Management Model can be better ensured, and the lessons learned and best practices can be optimally applied horizontally.
Target level	Absolute objective.
Scope	CIE Automotive and its value chain.
Base year	2021
Period	2021-2025
Hypothesis	The hypotheses and assumptions are those set out in the risk assessment.
Scientific evidence	It is widely accepted that implementing environmental management systems helps organisations improve their environmental performance, also in the area of pollution. They help them identify risks and opportunities and establish action plans to mitigate risks, exploit opportunities and measure their effectiveness.
Stakeholders concerned	Definition of objectives in accordance with the environmental policy and governance shown in previous sections. The concept of the standard is based on a value chain concept.
Geographical regions	The whole Group.
Variations	Despite the addition of new companies to the Group since 2021, the commitment has been maintained. It is true that the certification process for plants joining the group or *green fields* takes 15 to 24 months.
Performance	The target has been achieved, with the exception of ISO 14001 certification for two recently commissioned plants. These two plants have not obtained ISO 14001 certification because the deadlines indicated in the 'variations' section have not been met. Once the established deadlines have been met, the plants will be certified.

The alignment of the objectives and sub-topics of the IRO analysis are shown below:

Objective	**Resource inflows**	**Resource outflows**	**Waste**
Decrease the total amount of waste generated and not recycled			x
Reduce the intensity of water abstraction			x
Overall Net-Zero target	x	x	x
Short/medium-term range reduction of scope 3	x	x	x
Improvement of gross-weight-to-net-weight ratio	x	x	x
Industry 4.0 initiatives	x	x	x
Circularity projects	x	x	x
ISO 14001 certification	x	x	x

E5-3-24 *24 a)-f)* *AR 16 and 17*	*The disclosure required by paragraph 21 shall indicate whether and how the undertaking's targets relate to resource inflows and resource outflows, including waste and products and materials, and, more specifically to:* *(a) the increase of circular product design (including for instance design for durability, dismantling, reparability, recyclability etc);* *(b) the increase of circular material use rate;* *(c) the minimisation of primary raw material;* *(d) sustainable sourcing and use (in line with the cascading principle) of renewable resources;* *(e) the waste management, including preparation for proper treatment; and* *(f) other matters related to resource use or circular economy*

The response to this indicator is included under *E5-3-23*, stressing that projects such as efficiency through the incorporation of Industry 4.0 initiatives and improving the gross-to-net-weight ratio, together with their objectives, insist on making sustainable use of resources, irrespective of whether they come from renewable sources or origins.

E5-3-25	*The undertaking shall specify to which layer of the waste hierarchy the target relates.*

The relationship of the objectives to the hierarchy expressed in the policy is shown in the following table:

	Hierarchy				
Objective	Prevent	Reuse	Recycle	Energy recovery	Eliminate
Decrease the total amount of waste generated and not recycled	x	x	x		
Reduce the intensity of water abstraction	x		x	x	x
Overall Net-Zero target	x	x	x	x	x
Short/medium-term range reduction of scope 3	x	x	x	x	x
Improvement of gross-weight-to-net-weight ratio	x	x	x		
Industry 4.0 initiatives	x	x	x	x	x
Circularity projects	x	x	x	x	x
ISO 14001 certification	x	x	x	x	x

E5-3- *26 a)-c)* *AR 14*	*In addition to ESRS 2 MDR-T, the undertaking may specify whether ecological thresholds and entity-specific allocations were taken into consideration when setting targets. If so, the undertaking may specify:* ***(a) the ecological thresholds identified, and the methodology used to identify such thresholds*** ***(b) whether or not the thresholds are entity-specific and if so, how they were determined*** ***(c) how responsibility for respecting identified ecological thresholds is allocated in the undertaking.***

CIE Automotive has assessed its capacity to collect information relating to the ecological thresholds identified and the methodology used to identify these thresholds, applying an approach based on the principle of reasonable effort, which takes into account both the level of influence and the availability of resources, ensuring an appropriate balance between the quality of the information reported and the feasibility of the data collection effort.

In this second year of implementation of the directive, the information on the ecological thresholds identified and the methodology used to identify these thresholds will not be reported. To report on this in years to come, work will be done on compiling this information.

E5-3-27 *AR 20*	*The undertaking shall specify as part of the contextual information, whether the targets it has set and presented are mandatory (required by legislation) or voluntary.*

The objectives described in response to *E5-3-23 and 24 a)-f)* are voluntary, although obtaining ISO 14001 certification and complying with the Group's policy requires compliance with all mandatory objectives and requirements at each plant.

2.5.2.2 DR E5-4: Resource inflows

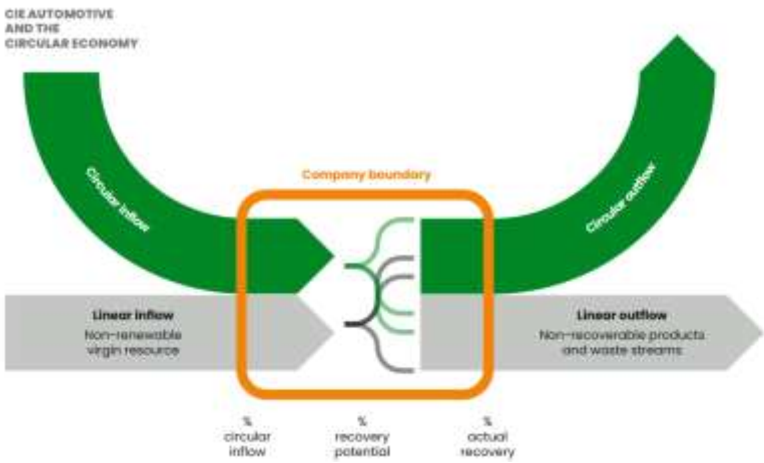
In the variations for 2025 compared to the 2024 reporting period, it should be noted that the following plants acquired by the Group have been added to the data report: CIE Engrecon, CIE Autometal Piracicaba and CIE Metal Norte.

E5-4-30 *AR 21*	*The disclosure required by paragraph 28 shall include a description of its resource inflows where material: products (including packaging) and materials (specifying critical raw materials and rare earths), water and property, plant and equipment used in the undertaking's own operations and along its upstream value chain.*

CIE Automotive develops products under the criteria of eco-design and efficiency, with a life-cycle approach, so that product repairability, disassembly and separation are improved as early as the design phase to increase their recyclability. Manufacturing any product involves an analysis of the environmental aspects associated with its production, from raw materials to waste disposal.

Thus, when selecting materials, guidelines and lessons learnt are used, and in the final phase the marking of polymeric materials is followed to promote their separation and recyclability. To further advance the circular economy, the 2025 Strategic Plan includes a series of indicators on circularity, based on the World Business Council for Sustainable Development (WBCSD) manual. The data collected indicate, for example, how often the collected water is used, which waste is recyclable and which is not, and what effects the plants' production are having on biodiversity.

CIE Automotive follows a circular production model, where products are designed according to design criteria, resources are used efficiently, and waste is minimised and recycled. During the 2025 financial year, various projects related to recyclability were carried out.



Main inputs:

- Steel.
- Aluminium.
- Plastics.
- Glass.
- Steel scrap.
- Aluminium scrap.
- Alloying elements for foundries
- Pig iron.
- Wood.
- Cardboard.
- Packaging plastics.
- Water.

As main semi-finished materials:

- Injection and over-injection moulded components (plastic and compound and natural rubber).
- Glass components.
- Aluminium castings (including pre-machined).
- Other metal components.

- Other plastic components.
- Fabric components.
- Forging (primary steel) (including pre-machined parts).
- Steel castings (primary steel) (including pre-machined parts).
- Steel formats (primary steel) (stamping process).

At CIE Automotive, the main materials are steel and aluminium, which are fundamental to both the company's own operations and its value chain.

- **Steel:** Steel can come in various forms, including primary steel, secondary steel and forged steel, as well as in various shapes and forms, such as iron ore, pipes, coils and frames. In terms of the supply chain, steel may contain a higher or lower percentage of recycled material, depending on the supplier's origin and processes. However, regardless of its input form, steel is 100% recyclable.
- **Aluminium:** Aluminium can enter the organisation in the form of primary aluminium, secondary aluminium, or as aluminium forgings. Like steel, aluminium is 100% recyclable, which reinforces our commitment to the circular economy.

These features allow us to optimise the sustainability of our operations, aligning us with best practices and environmental impact reduction targets.

The manufacturers the Group uses are general manufacturers that can work with a flexible range of SKUs, especially:

- Presses.
- Aluminium injection machines.
- Plastic injection moulding machines.
- Aluminium and iron melting furnaces.
- Assembly and welding cells.
- Machine tools for cutting and machining.
- Heat treatment furnaces.
- Painting lines.

E5-4-31 a)	*When an undertaking assesses that resource inflows is a material sustainability matter, it shall disclose the following information about the materials used to manufacture the undertaking's products and services during the reporting period, in tonnes or kilogrammes:* ***(a) the overall total weight of products and technical and biological materials used during the reporting period****.*

Tonnes	2025	2024
Biological materials	5,969.62	6,863.27
Technical materials	1,721,980.92	1,743,210.76
Raw materials	716,661.71	840,778.60
Process-related materials	77,579.26	69,627.32
Semi-fabricated articled or parts	352,891.04	398,154.65
Packaging materials	20,708.69	15,323.49
Externally recycled raw materials	192,891.03	194,911.10
Internally recycled raw materials	144,167.08	190,098.40
Semi-fabricated articles or parts - Intercompany transfers	217,082.11	34,317.20

E5−4−31 b)	*When an undertaking assesses that resource inflows is a material sustainability matter, it shall disclose the following information about the materials used to manufacture the undertaking's products and services during the reporting period, in tonnes or kilogrammes:* ***(b) the percentage of biological materials (and biofuels used for non-energy purposes) used to manufacture the undertaking's products and services (including packaging) that is sustainably sourced, with the information on the certification scheme used and on the application of the cascading principle.***

In 2025, 0.35% biological materials out of total materials (In 2024: 0.39%)

E5-4-31 c)	*When an undertaking assesses that resource inflows is a material sustainability matter, it shall disclose the following information about the materials used to manufacture the undertaking's products and services during the reporting period, in tonnes or kilogrammes:* ***(c) the weight in both absolute value and percentage, of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture the undertaking's products and services (including packaging).***

The weight in absolute value of reused or recycled secondary components, secondary intermediate products and secondary materials used to manufacture the company's products and services is 98,287.95 tonnes (2024: 84,950.80 tonnes), which represents 5.71% (2024: 4.85%) of the total raw materials used by the company.

E5-4-32	*The undertaking shall provide information on the methodologies used to calculate the data. It shall specify whether the data is sourced from direct measurement or estimations, and disclose the key assumptions used.*

The data were obtained from the invoices for the various products and should therefore be considered direct data.

2.5.2.3 DR E5-5: Resource outflows

In the variations for 2025 compared to the 2024 reporting period, it should be noted that the following plants acquired by the Group have been added to the data report: CIE Engrecon, CIE Autometal Piracicaba and CIE Metal Norte.

E5-5-35	*The undertaking shall provide a description of the key products and materials that come out of the undertaking's production process and that are designed along circular principles, including durability, reusability, repairability, disassembly, remanufacturing, refurbishment, recycling, recirculation by the biological cycle, or optimisation of the use of the product or material through other circular business models.*

On the one hand, it should be noted that CIE Automotive operates its products in a B2B scheme where it is the final assembler of the vehicle, which ends up selling it to the end consumer and that has control of the assembled vehicle's marketing, use, end of life and final specifications in terms of durability, reusability, repairability, disassembly, remanufacturing, refurbishment, recycling, recirculation by the biological cycle, or optimisation of the use of the product or material through other circular business models.

However, the Group's focus on processes with high circularity, reusability and recyclability is remarkable. CIE Automotive's product and process development processes also incorporate eco-design criteria and methodologies from the earliest stages. In line with all this are its initiatives to introduce eco-design procedures in the launching and industrialisation process of new products and projects, as well as its objectives and actions to increase the percentage of recyclability of waste and improve the gross-weight-to-net-weight ratio of its products.

In addition, it should be remembered that the main obligations of Directive 2000/53/EC on End-of-Life of Vehicles, which applies to the sector and that the Group's customers pass on as requirements in their standard specifications or as part of the design of the products we supply to them, are as follows:

- Reuse and recycle at least 85% of the vehicle's weight.
- Reuse 95% of the vehicle, including energy recovery.
- Ban on hazardous materials such as lead, mercury, cadmium and hexavalent chromium in car manufacturing.
- Obligation for manufacturers to design recyclable vehicles and to provide dismantling information.
- Dismantling and recycling must be carried out by authorised processing centres.
- Free for consumers: The scrapping of the vehicle must be free of charge at authorised centres.

This is coupled with the specific battery regulation (Regulation (EU) 2023/1542), with some features such as:

- Recycling targets: 80% recovery of lithium and 95% recovery of cobalt, nickel and copper by 2031.
- Manufacturers must use recycled materials in new batteries.
- A digital battery passport with component traceability.

As far as durability is concerned, the various vehicle manufacturers pass on durability requirements that guarantee compliance with the relevant legislation such as Euro 6 and Euro 7

- Engines and emission control systems (particulate filters, catalytic converters) must operate effectively for a longer period.

- The emission durability requirements were increased to 160,000 km or 10 years under Euro 6 and become more restrictive under Euro 7, with specific requirements for batteries.
- Manufacturers must ensure that their emission reduction systems do not lose effectiveness prematurely.

E5-5-36 a)	*Undertakings for which outflows are material shall disclose:* ***(a) The expected durability of the products placed on the market by the undertaking, in relation to the industry average for each product group.***

CIE Automotive does not have its own products and does not sell directly to end consumers. In addition, it supplies all the major automotive manufacturers, which have different requirements.

However, as explained in the response to *E5-5-35*, the sector's durability criteria are strict, ensuring a robust product for customers. The standardisation of the sector at the point of quality is highlighted by its internal standard IATF 16949, which is characterised by:

1. Integration of the quality approach in design:

The standard obliges manufacturers and suppliers to apply a **structured approach to product development**, ensuring that their products are robust and meet durability requirements.

Advanced Product Quality Planning (APQP):

- A rigorous planning process is required before a new component or vehicle can be manufactured.
- Reliability, durability and safety requirements are defined at the design stage.
- Methodologies such as Design Failure Mode and Effect Analysis (DFMEA) are applied to prevent design failures.

Risk management and validation tests:

- Validation tests must be carried out under extreme conditions to ensure the resistance of the product.
- Tools such as Design of Experiments (DOE) must be applied to optimise designs prior to production.

2. Process control to maintain robustness:

The standard imposes strict controls on production to ensure that robust designs are manufactured without deviations or defects.

Precision manufacturing and process control

- Strict control plans must be applied to ensure that each part meets design specifications.
- The use of Statistical Process Control (SPC) is required to detect variations and maintain quality.
- Critical parameters are monitored using the Production Part Approval Process (PPAP) prior to mass production.

Traceability and management of defects

- Problems should be documented and tracked to avoid repeated design failures.
- Use of the Eight Disciplines Problem Solving (8D) method to correct defects and improve design robustness.

3. Continuous improvement and reduction of variabilities

The standard obliges companies to constantly improve the quality and robustness of their designs.

Use of Plan-Do-Check-Act (PDCA) cycles:

- The processes must be continuously reviewed to identify opportunities for improvement.
- Reduced variability in materials and manufacturing is encouraged to ensure greater reliability.

Internal audits and supplier evaluations:

- Regular audits are required to ensure that the design and manufacturing processes remain robust.
- Suppliers must meet strict quality requirements to ensure that their materials and components are reliable.

E5–5–36 b)	*Undertakings for which outflows are material shall disclose:* ***(b) The reparability products, using an established rating system, where possible.***

CIE Automotive does not have its own products, and does not sell directly to end consumers, as stated in the response to *E5-5-35*.

E5-5-36 c)	*Undertakings for which outflows are material shall disclose:* ***(c) The rates of recyclable content in products and their packaging.***

Directive 2000/53/EC on End-of-Life of Vehicles sets mandatory recovery and reuse thresholds.

Current EU Recyclability Requirements

- 85% recycling and reuse → 85% of the weight of the vehicle must be reused or recycled.
- 95% total recovery → Including energy recovery, 95% of the total weight should be recovered.
- Disposal of hazardous materials → Ban on lead, mercury, cadmium and hexavalent chromium.
- Free of charge for owners → Authorised recycling centres must accept vehicles free of charge.

E5-5-37 a)	*The undertaking shall disclose the following information on its total amount of waste from its own operations, in tonnes or kilogrammes:* ***(a) the total amount of waste generated.***

In 2025 it was 383,483.37 tonnes, while in 2024 it was 357,869.23 tonnes.

E5-5-37 b) *AR 31*	*The undertaking shall disclose the following information on its total amount of waste from its own operations, in tonnes or kilogrammes:* ***(b) the total amount by weight diverted from disposal, with a breakdown between hazardous waste and non-hazardous waste and a breakdown by the following recovery operation types: i. preparation for reuse; ii. recycling; and iii. other recovery operations.***

2025	Hazardous	Non-hazardous
Reuse	4,907.97	57,816.13
Recycling	8,566.65	242,662.92
Other recovery operations	62.64	-
Total tonnes	**13,537.27**	**300,479.05**

2024	Hazardous	Non-hazardous
Reuse	4,020.96	35,511.01
Recycling	7,006.29	254,878.55
Other recovery operations	58.07	0.00
Total tonnes	**11,085.32**	**290,389.56**

E5-5-37 c) *AR 32*	*The undertaking shall disclose the following information on its total amount of waste from its own operations, in tonnes or kilogrammes:* ***(c) the amount by weight directed to disposal by waste treatment type and the total amount summing all three types, with a breakdown between hazardous waste and non-hazardous waste. The waste treatment types to be disclosed are: i. incineration; ii. landfill; and iii. other disposal operations.***

2025	Hazardous	Non-hazardous
Incineration	2,645.11	55,890.13
Landfill	1,516.92	6,085.77
Other disposal operations	2,972.27	356.85
Total tonnes	**7,134.30**	**62,332.75**

2024	Hazardous	Non-hazardous
Incineration	4,192.64	47,139.41
Landfill	1,329.49	1,184.35
Other disposal operations	2,367.51	180.96
Total tonnes	**7,889.63**	**48,504.72**

E5-5-37 d) *AR 27*	*The undertaking shall disclose the following information on its total amount of waste from its own operations, in tonnes or kilogrammes:* ***(d) the total amount and percentage of non-recycled waste.***

	2025	2024
Total amount of non-recycled waste (tonnes)	69,467.05	56,394.35
% waste not recycled	18.11%	15.76%

E5-5-38 a)	*When disclosing the composition of the waste, the undertaking shall specify:* ***(a) the waste streams relevant to its sector or activities (e.g. tailings for the undertaking in the mining sector, electronic waste for the undertaking in the consumer electronics sector, or food waste for the undertaking in the agriculture or in the hospitality sector).***

The waste streams relevant to our sector are mainly related to metal waste, in particular those from steel and aluminium scrap. These materials are key to our operations and represent a significant waste stream in terms of recycling and sustainable management within our industry.

E5-5-38 b)	*When disclosing the composition of the waste, the undertaking shall specify:* ***(b) the materials that are present in the waste (e.g. biomass, metals, non-metallic minerals, plastics, textiles, critical raw materials and rare earths).***

- Steel scrap: 226,697,366.24 kg (2024: 237,708,951 kg)
- Aluminium scrap: 15,965,553.51 kg (2024: 17,169,544 kg)

E5-5-40 *AR 33*	*The undertaking shall provide contextual information on the methodologies used to calculate the data and in particular the criteria and assumptions used to determine and classify products designed along circular principles under paragraph 35. It shall specify whether the data is sourced from direct measurement or estimations; and disclose the key assumptions used.*

The data has been obtained from collection certificates issued by waste management companies and is considered direct data (not estimates).

2.5.2.4 DR E5-6: Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities

E5-6-43 a) *AR 36*	*The disclosure shall include:* *(a) a quantification of the anticipated financial effects in monetary terms before considering resource use and circular economy-related actions, or where not possible without undue cost or effort, qualitative information. For financial effects arising from material opportunities, a quantification is not required if it would result in disclosure that does not meet the qualitative characteristics of information (see ESRS 1 Appendix B Qualitative characteristics of information).*

In this second year of implementation of the directive, no information will be reported regarding a quantification of the anticipated financial effects in monetary terms before considering the use of resources and actions related to the circular economy, or, when this is not possible without undue cost or effort, qualitative information. For financial effects arising from material opportunities, quantification is not required if it would result in disclosure that does not meet the qualitative characteristics of information (see ESRS 1 Appendix B Qualitative Characteristics of Information), due to the application of Delegated Regulation 2025/1416 ('quick fix') published in the OJEU on 10 November 2025, which amends the delegated regulation adopting the ESRS, in particular, for first-phase companies, it freezes and delays the application of the transitional provisions by two years.

As stated under *ESRS 2- SBM-3 –19 c)*, the resources and circularity risks have come out with a risk level of less than 2.15 on a scale of 5 for the 2050 time horizon and the Net Zero Emissions scenario (the worst-case scenario).

This process, detailed above, is based on surveys of key people in the organisation at the plant, regional and technology level. This procedure calculates the percentage of EBITDA and amount of revenues at risk. The level of risk is low and, accordingly, the potentially affected revenues are immaterial and none of CIE Automotive's targets or commitments are jeopardised.

3. Social Information

3.1 Own workforce (ESRS S1)

3.1.1 Strategy

3.1.1.1 DR related to ESRS 2 SBM-2 – Interests and views of stakeholders

ESRS 2 – SBM 2 - 12	*When responding to ESRS 2 SBM-2, the undertaking shall disclose how the interests, views, and rights of people in its own workforce, including respect for their human rights, inform its strategy and business model. The undertaking's own workforce is a key group of affected stakeholders.*

CIE Automotive gathers its employees' opinions about their employment situation through various channels, the most recurrent of which are the corporate intranet, the biannual work climate surveys conducted at all the plants, and the half-yearly newsletter.

Likewise, most of the plants have their own agreements and regular meetings are held with workers' representatives to discuss various labour issues and to learn about concerns in the social sphere.

In addition, in the case of new initiatives, such as the launch of the diversity and inclusion diagnostic at the beginning of the 2025 ESG Strategic Plan, workshops with employees and specific meetings can be held for this purpose.

3.1.1.2 DR Related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

ESRS 2 – SBM 3 - 13	*When responding to ESRS 2 SBM-3, paragraph 48, the undertaking shall disclose: (a)whether and how actual and potential occurrences on its own personnel, as determined in accordance with ESIS 2 IRO-1. Description of the processes for identifying and assessing material impacts, risks and opportunities: (i) arise from or relate to the firm's strategy and business models; and (ii) inform and contribute to the alignment of the firm's strategy and business model; and (b) the relationship between its material risks and opportunities arising from impacts on, and dependencies on, its own personnel and its strategy and business model.*

The overall process followed to identify and assess the impacts, risks and opportunities related to own workforce is described under *ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities*.

Impacts, Risks and Opportunities (IROs)

+: positive impact // -: negative impact // R: risk // O: opportunity

Subtopics	Sub-subtopics	IROs
Working conditions (own workers)	Secure employment	(+) Job and financial security for workers through stable.
		(R) Job losses and reduced value generation due to downsizing in company plants.
		(R) Increased job insecurity due to outsourcing operations to BRICs countries.
	Work-life balance	(O) Work-life balance due to working conditions including flexible working hours and measures to combat excessive working hours.
	Health and safety	(R) Deaths resulting from accidents during the working day.
Equal treatment and opportunities for all	Training and skills development	(+) Training policies that promote professional development and careers.
	Measures against violence and harassment in the workplace	(-) Cases of violence or harassment due to discrimination (racial, gender or sexual) in the company.
	Diversity	(-) Lack of representation of women at the entry levels of the company.
Other work-related rights	Forced labour*	(-) Vulnerable workers, due to modern slavery practices in the company's facilities.

	Child labour*	(-) Lack of protection for children due to cases of child labour in the company's plants.

*The company is not aware of any cases of forced or child labor, nor of any actual impacts arising from such cases.

ESRS 2 – SBM–3-14 a)	*When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all people in its own workforce who could be materially impacted by the undertaking are included in the scope of its disclosure under ESRS 2. These material impacts shall include impacts that are connected with the undertaking's own operations and its value chain, including through its products or services, as well as through its business relationships. In addition, the undertaking shall provide the following information:* ***(a) a brief description of the types of employees and non-employees in its own workforce subject to material impacts by its operations, and specify whether they are employees, self- employed people, or people provided by third party undertakings primarily engaged in employment activities.***

Virtually all of CIE Automotive's workforce are employees under contract who are classified by hierarchical level as officers, middle management and executives or, functionally, as direct, indirect or structural personnel.

Although on a much more limited scale (and specific to certain geographic areas and not others), our plants are also accessible to employees from suppliers and temporary employment agencies.

ESRS 2 – SBM–3-14 b)	*When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all people in its own workforce who could be materially impacted by the undertaking are included in the scope of its disclosure under ESRS 2. These material impacts shall include impacts that are connected with the undertaking's own operations and its value chain, including through its products or services, as well as through its business relationships. In addition, the undertaking shall provide the following information:* ***(b) in the case of material negative impacts, whether they are either (i) widespread or systemic in contexts where the undertaking operates (for example, child labour or forced labour or compulsory labour in specific countries or regions outside the EU), or (ii) related to individual incidents (for example, an industrial accident or an oil spill); by its operations, and specify whether they are employees, self- employed people, or people provided by third party undertakings primarily engaged in employment activities.***

In 2025, there were no potential negative impacts related to forced or child labour related to CIE Automotive's own operations and/or its value chain.

In 2025, in line with the materiality analysis from the previous year, potential negative impacts related to child or forced labour have been identified, as described in the table corresponding to datapoint *ESRS 2-SBM 2-13*. These impacts are considered widespread or systemic, as they arise from the contexts in which the company operates and not from individual incidents.

ESRS 2 – SBM–3-14 c)	*When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all people in its own workforce who could be materially impacted by the undertaking are included in the scope of its disclosure under ESRS 2. These material impacts shall include impacts that are connected with the undertaking's own operations and its value chain, including through its products or services, as well as through its business relationships. In addition, the undertaking shall provide the following information:* ***(c) in the case of material positive impacts, a brief description of the activities that result in the positive impacts, the types of employees and non-employees in its own workforce that are positively affected or could be positively affected; the undertaking may also disclose whether the positive impacts occur in specific countries or regions.***

The actual positive impacts related to workers' employment and financial stability, and to their training and skills development through training programmes, have a global reach in the regions where the company operates.

All the actions derived from the 2025 ESG Strategic Plan have an impact on all the production plants:

- All the plants will be ISO 45001 certified. Right now, practically all of them are already certified, with a level already above 100%, and they will carry out the CIE SAFETY questionnaire in which they must obtain more than 85 points or propose an action plan to improve the indicators to reach this objective, in addition to working according to the guidelines of the corporate policy of Occupational Risk Prevention and Health and Safety.
- A diversity diagnosis is carried out in all the plants, to take measures that will benefit the entire workforce.

- All the plant managers and human resources directors have formalised their commitment to human rights by signing the Human Rights Policy, with a consequent positive impact on the company's own employees.
- All the plant managers and members of the plant Management Committees have been trained in ESG matters, meeting the target set one year before the end of the 2025 ESG Strategic Plan.
- Lastly, all the employees have guaranteed access to both the whistleblowing channel and to the mechanisms of the company's protocol for preventing and dealing with harassment situations.

ESRS 2 – SBM–3-14 d) AR 44	*When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all people in its own workforce who could be materially impacted by the undertaking are included in the scope of its disclosure under ESRS 2. These material impacts shall include impacts that are connected with the undertaking's own operations and its value chain, including through its products or services, as well as through its business relationships. In addition, the undertaking shall provide the following information: **(d) any material risks and opportunities for the undertaking arising from impacts and dependencies on its own workforce.***

All the material risks and opportunities for CIE Automotive arising from the impacts and dependencies of its own workforce are included in the response to the previous section *3.1.1.2 DR related to ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model.*

ESRS 2 – SBM–3-14 e)	*When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all people in its own workforce who could be materially impacted by the undertaking are included in the scope of its disclosure under ESRS 2. These material impacts shall include impacts that are connected with the undertaking's own operations and its value chain, including through its products or services, as well as through its business relationships. In addition, the undertaking shall provide the following information: **(e) any material impacts on its own workforce that may arise from transition plans for reducing negative impacts on the environment and achieving greener and climate- neutral operations, including information on the impacts on own workforce caused by the undertaking's plans and actions to reduce carbon emissions in line with international agreements. Impacts, risks and opportunities include restructuring and employment loss as well as opportunities arising from job creation and reskilling or upskilling.***

All the material risks and opportunities for CIE Automotive arising from the impacts and dependencies of its own workforce are included in the response to the previous section *3.1.1.2 DR related to ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model.*

ESRS 2 – SBM–3-14 f) i	*When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all people in its own workforce who could be materially impacted by the undertaking are included in the scope of its disclosure under ESRS 2. These material impacts shall include impacts that are connected with the undertaking's own operations and its value chain, including through its products or services, as well as through its business relationships. In addition, the undertaking shall provide the following information: **(f) operations at significant risk of incidents of forced labour or compulsory labour either in terms of: i. type of operation (such as manufacturing plant).***

CIE Automotive ensures that none of its activities, particularly at its manufacturing sites, involve forced or compulsory labour. To ensure compliance, an annual survey is carried out to identify the plants at risk of these rights being violated and to take appropriate measures if necessary.

In the surveys conducted to date, no manufacturing plants with significant risk were identified in CIE Automotive's operations. However, continuous monitoring is maintained to ensure all the worksites are in compliance.

ESRS 2 – SBM–3-14 f) ii	*When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all people in its own workforce who could be materially impacted by the undertaking are included in the scope of its disclosure under ESRS 2. These material impacts shall include impacts that are connected with the undertaking's own operations and its value chain, including through its products or services, as well as through its business relationships. In addition, the undertaking shall provide the following information*: ***(f) operations at significant risk of incidents of forced labour or compulsory labour either in terms of: ii. countries or geographic areas with operations considered at risk.***

CIE Automotive ensures that none of its activities, regardless of their country or region, involve forced or compulsory labour. To ensure compliance, an annual survey is carried out to identify the plants at risk of these rights being violated and to take appropriate measures if necessary. In the surveys conducted to date, no countries or regions with significant risk were identified in CIE Automotive's operations. However, continuous monitoring is maintained to ensure compliance in all the regions where we operate.

ESRS 2 – SBM–3-14 g) i	*When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all people in its own workforce who could be materially impacted by the undertaking are included in the scope of its disclosure under ESRS 2. These material impacts shall include impacts that are connected with the undertaking's own operations and its value chain, including through its products or services, as well as through its business relationships. In addition, the undertaking shall provide the following information*: ***(g) operations at significant risk of incidents of child labour either in terms of: i. type of operation (such as manufacturing plant).***

CIE Automotive ensures that none of its activities, especially in its manufacturing plants or in any type of operation, involve child labour.

In its contractual relations, it implements prevention and control measures related to the minimum working age, in conformity with the standards of the International Labour Organization, or in conformity with the applicable legislation whenever it is more restrictive. In the surveys conducted to date, no manufacturing plants with significant risk were identified in CIE Automotive's operations. However, continuous monitoring is maintained to ensure all the worksites are in compliance.

ESRS 2 – SBM–3-14 g) ii	*When fulfilling the requirements of paragraph 48, the undertaking shall disclose whether all people in its own workforce who could be materially impacted by the undertaking are included in the scope of its disclosure under ESRS 2. These material impacts shall include impacts that are connected with the undertaking's own operations and its value chain, including through its products or services, as well as through its business relationships. In addition, the undertaking shall provide the following information*: ***(g) operations at significant risk of incidents of child labour either in terms of: ii. countries or geographic areas with operations considered at risk.***

CIE Automotive ensures that none of its activities, regardless of their country or region, involve child labour.

In its contractual relations, it implements prevention and control measures related to the minimum working age, in conformity with the standards of the International Labour Organization, or in conformity with the applicable legislation whenever it is more restrictive. In the surveys conducted to date, no manufacturing plants with significant risk were identified in CIE Automotive's operations. However, continuous monitoring is maintained to ensure all the worksites are in compliance.

ESRS 2 – SBM–3-15	*In describing the main types of people in its own workforce who are or could be negatively affected, based on the materiality assessment set out in ESRS 2 IRO 1, the undertaking shall disclose whether and how it has developed an understanding of how people with particular characteristics, those working in particular contexts, or those undertaking particular activities may be at greater risk of harm.*

CIE Automotive actively works to understand the specific risks faced by the workers in its various operations. To this end, we have integrated international standards, such as those set by the International Labour Organisation (ILO), into our policies and processes. In addition, we conduct regular health and safety assessments at our sites, which enable us to identify and mitigate the specific risks associated with particular work contexts, activities or worker characteristics. This approach ensures a safe, respectful and inclusive working environment.

ESRS 2 – SBM–3-16 AR 9	*The undertaking shall disclose which, if any, of its material risks and opportunities arising from impacts and dependencies on people in its own workforce relate to specific groups of people (for example, particular age groups, or people working in a particular factory or country) rather than to all of its own workforce (for example, a general pay cut, or training offered to all people in its own workforce).*

At CIE Automotive there is a risk, and in turn an opportunity, arising from the impacts and dependencies on people in its own workforce that relate to specific groups of people rather than its entire workforce, and that is the lack of representation of women at the company's entry levels, where their presence is lower than in Senior Management or on the Board.

3.1.2 Management of impacts, risks and opportunities

3.1.2.1 DR S1-1 – Policies related to own workforce

S1-1-19	*The disclosure required by paragraph 17 shall contain the information on the undertaking's policies to manage its material impacts, risks and opportunities related to its own workforce in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters. In addition, the undertaking shall specify if such policies cover specific groups within its own workforce or all of its own workforce.*

CIE Automotive has policies in place to manage the material impacts related to its own workforce.

CIE Automotive's ethical framework is developed through a series of corporate policies that must be complied with by all members of the company. These policies were first approved by the Board in December 2015 and last reviewed in 2024. It should be noted that a new Board Member Remuneration Policy was approved in 2023, and is in force until 2026. All of CIE Automotive's policies can be consulted on the corporate website.

Title	**Professional Code of Conduct**
Description	CIE Automotive conducts its business and professional activities in accordance with a Professional Code of Conduct, which serves as an ethical guide at all levels of the organisation.
Objective	To provide ethical guidelines and principles of conduct for all directors, managers, employees and workers of all the companies that comprise the Group, determining the values and commitments that must govern their work activities within the Group. It was drawn up with the aim of meeting the demands of both stakeholders and society in general, and thus continue to earn the commitment and trust they have placed in the Group.
Material Impacts, Risks and Opportunities	IROs related to the subtopics corporate culture, corruption and bribery, supplier relationship management, including payment practices, political participation and lobbying, and whistleblower protection, as well as those IROS related to working conditions, other work-related rights, Equal treatment for all, both for own workers and the entire value chain.
Scope	This Code of Conduct is binding for all members of the Group without exception. All employees have the obligation to understand and comply with these rules of conduct, and in no jurisdiction will ignorance of the law exempt them from compliance. CIE Automotive will also encourage its business partners or business associates (joint ventures, temporary joint ventures, suppliers, customers, contractors and collaborating companies) to act in accordance with this Code and to apply ethical programmes that are consistent with its standards. The Group will take appropriate action if it becomes clear that they have not complied with their policies or contractual obligations.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	The Professional Code of Conduct applies globally.
Value Chain	CIE Automotive will encourage its Value Chain to act in accordance with this Professional Code of Conduct and to implement ethical programmes that are consistent with its standards. The Group will take appropriate action if it becomes clear that they have not complied with their policies or contractual obligations.
Body responsible for implementation	CIE Automotive's Board, through its Audit Committee, is ultimately responsible for the existence and application of the Professional Code of Conduct.
Availability	Public document posted on the corporate website and on the Group's intranet.

Policy	**Health and Safety**
Description	CIE Automotive's Health and Safety Policy.
Objective	To provide safe and healthy working conditions and promote people's health.
Material Impacts, Risks and Opportunities	Working conditions, Other work-related rights, Equal treatment for all, both for the company's own workers and its entire value chain.
Scope	All CIE Automotive subsidiaries and affiliates where the company exercises financial and operational control. Applies to all workers in the Value Chain. There are no geographical or technological exclusions.
Stakeholders concerned	Value Chain Workers, Shareholders, Funders, Professionals, Customers, Business Partners, Suppliers, Society, Public Administrations and the Sector.
Geographical regions	The policy covers all regions where CIE Automotive is present.
Body responsible for implementation	The CEO, supported by the corporate Human Resources and Occupational Risk Prevention Department.
Availability	Document on the Group's corporate intranet.

Policy	**Human Rights Policy**
Description	This policy formalises the company's commitment in this area, in a manner consistent with the Professional Code of Conduct and the ten principles of the United Nations Global Compact (https://unglobalcompact.org/).
Objective	To minimise the risk of human rights violations, by establishing principles and guidelines for due diligence in relation to those rights, so that this Policy can be used to identify, prevent, mitigate, and remedy all potential negative impacts.
Material Impacts, Risks and Opportunities	IROs related to the subtopics of working conditions, other work-related rights, equal treatment for all.
Scope of the policy	Compliance with this Policy is compulsory for all members of the Group, without exception. In addition, the rules and principles from this policy must be observed by all external parties that act for or on behalf of CIE Automotive, or that participate, collaborate, or act as intermediaries in relation to its operations or business affairs.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	CIE Automotive's Human Rights Policy applies to all of the Group's activities, regardless of the worldwide location where they are being performed.
Value Chain	CIE Automotive must distribute its commitment to human rights across its entire value chain. Likewise, CIE Automotive is committed to disseminating this policy to its suppliers, contractors, collaborating companies and customers, promoting and incentivising the various components of the value chain to implement their own policy in relation to this matter and, if they do not have one, to adhere to the Group's policy.
Body responsible for implementation	The Board, through its ESG Committee, is ultimately responsible for the existence and application of this policy.
Availability	Public document posted on the corporate website and on the Group's intranet.

Policy	**Environmental, Social and Governance (ESG) policy**
Description	Describes the company's overall ESG objectives and criteria.
Objective	The policy establishes the basic principles and general framework for managing CIE Automotive's ESG practices, and serves as the basis for integrating ESG into CIE Automotive's business model and strategy, thereby creating long-term value for all of CIE Automotive's stakeholders and for the Company itself, making use of the corporate website as the main instrument for channelling stakeholder relations.
Material Impacts, Risks and Opportunities	IROs related to the subtopics of working conditions and other work-related rights.
Scope of the policy	Compliance with this Policy is compulsory for all members of the Group, without exception. In addition, the rules and principles from this policy must be observed by all external parties that act for or on behalf of CIE Automotive, or that participate, collaborate, or act as intermediaries in relation to its operations or business affairs.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	This policy must be applied in relation to all of the Group's activities, regardless of the worldwide location where they are performed.
Body responsible for implementation	The Board, through its ESG Committee, is ultimately responsible for the existence and application of this policy.
Availability	Public document posted on the corporate website and on the Group's intranet.

Policy	**Social Action Policy**
Description	CIE Automotive, S.A., believes that the Group should engage in social action, to help provide solutions for the difficulties and needs existing in the communities where it operates. This is based on its understanding that a company's success should go hand-in-hand with a commitment to working towards a more prosperous society. One of the objectives of the Group's commercial activities is to create wealth and improve quality of life in the communities where it operates. It is therefore based on a model of sustainable action, in which specific contributions are combined with more lasting forms of contribution.
Objective	- To contribute to improving the communities where CIE Automotive operates. - To increase employee satisfaction. - To enhance the Group's reputation.
Material Impacts, Risks and Opportunities	IROs related to the subtopic of equal treatment for all.
Scope of the policy	Compliance with this Policy is compulsory for all members of the Group, without exception.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	This policy must be applied in relation to all of the Group's activities, regardless of the worldwide location where they are performed.
Body responsible for implementation	The Board, through its ESG Committee, is ultimately responsible for the existence and application of this policy.
Availability	Public document posted on the corporate website and on the Group's intranet.

Document	**Protocol for preventing and handling harassment situations**
Description	This protocol, which demonstrates CIE's commitment to ESG in general and its zero tolerance of this type of situation in particular, applies to mobbing and sexual and gender-based harassment, and is designed to detect, evaluate and propose solutions if those situations arise.
Objective	This protocol aims to prevent harassment from occurring in the workplace and, if it does occur, to ensure that appropriate procedures are in place to deal with the problem and prevent it from recurring. These measures are intended to ensure a working environment free of harassment, in which all employees respect the dignity of their coworkers in the professional and personal sphere.
Material Impacts, Risks and Opportunities	IROs related to the subtopic of equal treatment for all.
Scope	This protocol is compulsory for all members of the Group, without exception.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	This protocol and its corresponding principles must be applied in relation to all of the Group's activities, regardless of the worldwide location where they are performed.
Body responsible for implementation	The Audit and Compliance Committee is ultimately responsible for the existence and application of this protocol.
Availability	Public document posted on the corporate website and on the Group's intranet.

This information is expanded upon and illustrated with examples in response to datapoints *S1-4-38 a)* and *b)* and *S1-5-47 a)*.

S1-1-20	*The undertaking shall describe its human rights policy commitments that are relevant to its own workforce, including those processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. In its disclosure it shall focus on those matters that are material in relation to, as well as its general approach.*

CIE Automotive formalises its commitment to human rights through its Human Rights Policy, which is aligned with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and OECD Guidelines. The policy guarantees:

- Respect and prevention of discrimination on the basis of personal, political or socio-economic characteristics.
- Prohibition of child and forced labour, with measures to prevent and correct possible risks.
- Decent working conditions, the right to rest, and health and safety measures.
- Freedom of association and collective bargaining.
- Promotion of human rights throughout the value chain.

CIE Automotive assesses compliance with this policy through:

- Whistleblowing Channel: Available to employees and third parties, managed by the Compliance body, as Head of the Internal Whistleblowing System, where possible violations can be reported in full confidentiality and without retaliation.
- Periodic audits and reviews: Supervised by the ESG Committee.
- Training and awareness-raising: Promoting respect for human rights, especially in high-risk regions.

The policy is reviewed annually to keep it in line with international best practices.

S1-1-20 a)	*The undertaking shall describe its human rights policy commitments that are relevant to its own workforce, including those processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. In its disclosure it shall focus on those matters that are material in relation to, as well as its general approach.* ***(a) respect for the human rights, including labour rights, of people in its own workforce.***

CIE Automotive upholds the inherent rights of all people, which are universally recognised and enshrined in the United Nations Global Compact, which it became a signatory of in 2015.

This commitment to human rights is embodied in its Human Rights Policy, which formalises its commitment to respecting human rights in all its activities and applies not only to its employees, but also to its customers, suppliers and the communities surrounding its facilities, including indigenous peoples.

In this way, it rejects child or forced labour and discrimination in employment and occupation, and promotes respect for freedom of association and the right to collective bargaining and compliance with the legislation of the countries where it operates, in accordance with internationally recognised rights and its own Human Rights Policy.

CIE Automotive offers its employees decent working conditions, fair pay for the work they perform, and the training and safety they need to perform their jobs. In addition, it respects their freedom of association and their right to collective bargaining, regardless of the country in which they are based.

These commitments are defined in its Human Rights Policy, which is signed by all the plant managers and HR managers and is drafted in accordance with the core conventions of the International Labour Organisation and the universal labour principles set out in the United Nations Global Compact.

To ensure compliance, an annual survey is carried out to identify the plants at risk of these rights being violated and to take appropriate measures if necessary. In 2025, 100% of the plants reported that they have not identified any risks in this area.

CIE Automotive ensures that no use of forced labour or child labour exploitation takes place in any of its activities. In its contractual relations, it implements prevention and control measures related to the minimum working age, in conformity with the standards of the International Labour Organization, or in conformity with the applicable legislation whenever it is more restrictive. In 2025, there were no cases of child or forced labour.

S1-1-20 b)	*The undertaking shall describe its human rights policy commitments that are relevant to its own workforce, including those processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. In its disclosure it shall focus on those matters that are material in relation to, as well as its general approach.* ***(b) engagement with people in its own workforce.***

CIE Automotive's relationship with its employees is governed by ethical principles and is based on respect for people. CIE Automotive values and respects freedom of association, fostering collective bargaining through ongoing dialogue with employee representatives, both at its European plants and in countries with a weaker trade union tradition.

In 2025, 60% of its workers were covered by collective bargaining agreements. During the year, 43 collective agreements or pacts (geographical, sectoral or production centre) were signed in several of its worksites in the following countries: Spain, Slovakia, France, Czech Republic, Romania, Brazil, Mexico, China, and India. These agreements incorporate specific company obligations negotiated with its labour partners at each plant, including the importance given to essential issues such as prevention, safety and health for employees.

Human Rights Policy

CIE Automotive's Human Rights Policy formalises its commitment in this area, in a manner consistent with its Code of Conduct and the ten principles of the United Nations Global Compact.

CIE Automotive bases its definition on the International Bill of Human Rights and also:

- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- The United Nations Guiding Principles on Business and Human Rights.
- The OECD Due Diligence Guidance.
- The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

- The United Nations Sustainable Development Goals (SDGs). Respect for human rights is one of CIE Automotive's fundamental commitments, as well as an aspect inseparably linked to the United Nations 2030 Agenda for Sustainable Development.

CIE Automotive believes that all enterprises and organisations, including those from the public sector and those from the private sector, must make a commitment to respecting human rights, and it is therefore committed to respecting those rights during all of its activities. It applies that commitment not only to the Group's employees, but also to its value chain workers, customers and suppliers, and to the communities where its facilities are located, including indigenous peoples.

CIE Automotive performs all of its activities in accordance with the principle of respect for human rights, and it is committed to:

- <u>Avoiding discriminatory practices:</u> Ensuring a work environment free from any discrimination based on gender, race, ethnicity, religion, age, disability, political views, union affiliation, sexual orientation, nationality, marital status, or socio-economic or hierarchical status, or any other form of discrimination.
- <u>Rejecting any use of forced labour or child labour:</u> Ensuring that no use of forced labour or child labour exploitation is taking place during any of its activities. CIE Automotive must therefore ensure that its procurement and contracting policies stipulate prevention and control measures related to the minimum working age, in conformity with the standards of the International Labour Organization, or in conformity with the applicable legislation whenever it is more restrictive. It is furthermore committed to complying with the labour legislation in force in the countries where it operates, and to implementing the appropriate corrective measures whenever necessary.
- <u>Offering decent employment:</u> Offering its employees fair pay, in accordance with the skills and knowledge they possess. In addition, it ensures compliance with the labour legislation in force in all of its locations, as well as its employees' right to time off. In line with this commitment, it also strives to implement measures that allow for flexible working hours. Its employee pay packages equal or exceed the legal minimums in each region, thus showing its commitment to paying a living wage. To ensure equal pay in all its operations, each year the Company will publish the ratio between the statutory minimum wage and the lowest-paid employees at its latest acquisitions, and it is committed to taking corrective action if this ratio falls below the minimum wage commitment.
  During the 2025 financial year, the Brazilian companies CIE Autometal Piracicaba and CIE Engrecon joined the Group. A pay equity analysis was carried out at both plants, confirming that the remuneration of the lowest-paid employee exceeds the current legal minimum. At CIE Engrecon, the ratio between the lowest salary and the local minimum wage is 1.0 for men and 1.4 for women, while at CIE Autometal Piracicaba, this ratio is 1.0 for both men and women.
- <u>Protecting people's health:</u> offering its employees a safe and healthy workplace, including strict compliance with all applicable legal requirements on occupational health and occupational risk prevention.
- <u>Facilitating collective bargaining and freedom of association:</u> CIE Automotive respects its employees' rights to collective bargaining and freedom of association. To the greatest extent possible, the Group must make it possible for its employees to freely gather and discuss pertinent issues related to their employment.
- <u>Encouraging a culture of respect for human rights</u> and raising employees' awareness of this subject. This especially applies to locations with the greatest risk of those rights being violated.

S1-1-20 c)	*The undertaking shall describe its human rights policy commitments that are relevant to its own workforce, including those processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. In its disclosure it shall focus on those matters that are material in relation to, as well as its general approach.* ***(c) measures to provide and/or enable remedy for human rights impacts.***

As stipulated in its Human Rights Policy, all CIE Automotive employees have an obligation to report any potential breaches of the commitments described in this policy, as well as any related to the other guidelines and rules of conduct established in the Professional Code of Conduct. They must also be allowed to file those reports anonymously if they wish.

Any reports that are filed must be treated as strictly confidential, with safeguards against retaliation for anyone filing a report in good faith. Reports may also be filed by anyone who observes any potentially improper practices, even if they are not employees of the Group.

The company makes a fully confidential Whistleblowing Channel available to facilitate reporting of irregular conduct or activities, and that channel can also be used by anyone from the Group to ask questions about any form of potentially improper conduct. The functioning of the Whistleblowing Channel is managed by the Compliance Body, and all reporting received via that channel is analysed in compliance with the Whistleblowing Channel Rules. Once the filed reports are duly analysed, they are then submitted to the Audit and Compliance Committee.

As in previous years, in 2025, training activities were carried out in the area of human rights. Specifically, over 56 thousand hours of training in human rights-related matters were provided to over 7,000 employees throughout the Group.

S1-1-21 *AR 21*	*The undertaking shall disclose whether and how its policies with regard to its own workforce are aligned with relevant internationally recognised instruments, including the UN Guiding Principles on Business and Human Rights.*

Human Rights Policy

CIE Automotive's Human Rights Policy formalises its commitment in this area, in a manner consistent with its Code of Conduct and the ten principles of the United Nations Global Compact.

CIE Automotive bases its definition on the International Bill of Human Rights and also:

- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- The United Nations Guiding Principles on Business and Human Rights.
- The OECD Due Diligence Guidance.
- The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- The United Nations Sustainable Development Goals (SDGs). Respect for human rights is one of CIE Automotive's fundamental commitments, as well as an aspect inseparably linked to the United Nations 2030 Agenda for Sustainable Development.

Respect for human rights is one of CIE Automotive's fundamental commitments, as well as an aspect inseparably linked to the United Nations 2030 Agenda for Sustainable Development.

S1-1-22	*The undertaking shall state whether its policies in relation to its own workforce explicitly address trafficking in human beings, forced labour.*

CIE Automotive upholds the inherent rights of all people, which are universally recognised and enshrined in the United Nations Global Compact, which it became a signatory of in 2015. This commitment to human rights is embodied in its Human Rights Policy, which formalises its commitment to respecting human rights in all its activities and applies not only to its employees, but also to its customers, suppliers and the communities surrounding its facilities, including indigenous peoples.

In this way, it rejects child or forced labour and discrimination in employment and occupation, rejects human trafficking and forced labour, and promotes respect for freedom of association and the right to collective bargaining and compliance with the legislation of the countries where it operates, in accordance with internationally recognised rights and its own Human Rights Policy, which mentions the fundamental conventions of the International Labour Organisation related to respect for freedom of association and the right to collective bargaining.

On the other hand, by rejecting discrimination in all its forms, as well as the various policies and audit mechanisms it has in place, the Group ensures there is no human trafficking in its perimeter. With its Sustainable Procurement policy, it has made a specific stipulation regarding human trafficking in its value chain, where it states that the company is committed to promoting and respecting human rights throughout its supply chain, ensuring non-discrimination of any kind, the right to freedom of association, and the eradication of child and forced labour, as well as human trafficking.

S1-1-23	*The undertaking shall state whether it has a workplace accident prevention policy or management system.*

CIE Automotive has a Health and Safety Policy and an Occupational Risk Prevention or Process 12 Framework System. Both the policy and the framework system are based on the ISO 45001 certification system and each plant obtains its own ISO certification.

The scope of the Health and Safety policy and framework system is Group-wide, and the latest revision of the policy was approved in November 2021.

In addition, the Group has determined in its 2025 ESG Strategic Plan that all sites within the Group's scope at the beginning of the Plan (2020) must be ISO 45001 certified by the end of 2025 and must complete the CIE SAFETY questionnaire annually. If they do not obtain a minimum of 85 out of 100 points, they will have to establish action plans to this effect.

These stringent rules have made it possible in recent years to reduce the number of accidents and the frequency and severity rates associated with them.

S1-1-24 a)	*The undertaking shall disclose*: ***(a) the elimination of discrimination, including harassment, promoting equal opportunities and other ways to advance diversity and inclusion.***

CIE Automotive has adopted a set of values, codes and mechanisms to guarantee the integrity and ethics of its actions. This ethical framework, set out in its Professional Code of Conduct, forms a solid basis, subject to continuous review. During the 2025 financial year, training activities continued to be carried out for the development of the Ethics Channel.

Since 2020, CIE Automotive has also had a Harassment Prevention and Treatment Protocol in place, which is mandatory at all Group facilities. This protocol addresses the prevention of mobbing, sexual and gender-based harassment, and includes various preventive measures, such as zero-tolerance for harassment, making all employees responsible for monitoring work-related behaviour, and implementing communication programmes. The full protocol is available on the corporate website.

On the other hand, diversity management is one of the main challenges for the company, which strives to bring together people of different culture, gender, generation and ability. For this reason, the 2025 Strategic Plan called for 100% of its plants to carry out a diversity and inclusion diagnosis (an objective that was already met this year (2024), one year ahead of the target) to obtain an overall picture of the diversity throughout the Group and take the appropriate corrective measures.

S1-1-24 b) *AR 15 and 16*	*The undertaking shall disclose*: ***(b) whether the following grounds for discrimination are specifically covered in the policy: racial and ethnic origin, colour, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national extraction or social origin, or other forms of discrimination covered by Union regulation and national law.***

The response to this indicator is provided under *S1-1-24 a)* above.

S1-1-24 c)	*The undertaking shall disclose*: ***(c) whether the undertaking has specific policy commitments related to inclusion or positive action for people from groups at particular risk of vulnerability in its own workforce and, if so, what these commitments are.***

Diversity management is one of the main challenges for the company, which strives to bring together people of different culture, gender, generation and ability. For this reason, the 2025 ESG Strategic Plan called for 100% of its production plants to carry out a diversity and inclusion diagnosis (target that was already achieved in 2024, one year ahead of schedule) to obtain an overall picture of the diversity throughout the Group and take the appropriate corrective measures.

The diagnostics were carried out using a shared diversity and inclusion tool, which assesses diversity in terms of gender, age, multiculturalism and functional diversity. This is done through diversity metrics and talent-related practices such as recruitment, hiring, promotion, training, compensation, performance and turnover, among others. In addition, a questionnaire is used to analyse plant-specific sensitivities.

The Diversity, Equity and Inclusion Committee, established in 2021 and composed of 14 representatives from all the divisions and regions, is the body in charge of these diagnostics. In situations where common problems are identified, corporate actions are being considered for implementation in the coming years, either for several plants or for the whole Group.

S1-1-24 d)	*The undertaking shall disclose*: ***(d) whether and how these policies are implemented through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected, as well as to advance diversity and inclusion in general.***

Protocol for preventing and handling harassment situations.

This protocol aims to prevent harassment from occurring in the workplace and, if it does occur, to ensure that appropriate procedures are in place to deal with the problem and prevent it from reoccurring. These measures are intended to ensure a harassment-free working environment, in which everyone respects the dignity of their colleagues, both professionally and personally.

The scope of application of this protocol is CIE Automotive. Production plants that have their own protocol in this area may apply their own specific protocol but will ensure that such protocol is consistent with the minimum measures and procedures set out in this corporate protocol.

Similarly, CIE Automotive has mechanisms, protocols and tools in place to facilitate the reporting of infractions and irregularities at the Company or breaches of its Professional Code of Conduct, including reporting harassment.

In 2023, it strengthened its Whistleblowing Channel by installing a digital platform on its corporate website and its corporate intranet, which ensures the security of the whistleblowing process and simplifies how the Company manages each case.

It is a cutting-edge and intuitive system in all the languages of the countries where the company is present, which offers the possibility of opening a secure mailbox where users can submit reports and provide complementary information in various formats (in writing, voice messages, etc.). All the information is confidential and, if the whistleblower wishes, anonymous.

The new digital channel has been implemented in accordance with the requirements of the Spanish Whistleblower Protection Act [*Ley 2/2023, de 20 de febrero, de protección de las personas que informen de incumplimientos normativos y de la corrupción*] and in line with international legal requirements, which derive from Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 (the "Whistleblowing Directive").

In all the cases reported in 2025 and communicated to both the Audit and Compliance Committee and the ESG Committee, the appropriate actions were taken to study, monitor and resolve or close the cases. The actions may include specific training plans, conciliatory measures, disciplinary proceedings and also dismissal. In the latter case, 14 people were dismissed as a result of the actions taken following the relevant internal investigations: nine people related to cases of moral harassment, three to cases of sexual harassment, one person related to cases of corruption and one person related to the report of a conflict of interest.

3.1.2.2 DR S1-2 - Processes for engaging with own workforce and workers' representatives about impacts

S1-2-27	*The undertaking shall disclose whether and how the perspectives of its own workforce inform its decisions or activities aimed at managing the actual and potential impacts on its own workforce.*

CIE Automotive recognises the importance of its own workforce's perspectives in managing the actual and potential impacts on its employees. To this end, the Company conducts work climate surveys every two years in each production centre, to comprehensively capture the opinions and concerns of its workers.

In 2025, 47 surveys were conducted, obtaining an average score of 7.4 out of 10, reflecting a positive level of overall satisfaction.

The results of these surveys were instrumental in informing specific decisions and actions aimed at improving the working environment and addressing staff concerns. Although the average score reflects a positive level of overall satisfaction, detailed analysis of the different dimensions allows specific areas for action to be prioritised and the effectiveness of the measures implemented to be subsequently evaluated through successive measurements.

The main measures taken on the basis of feedback from employees include:

- In China, initiatives are being promoted to strengthen the company's competitiveness and innovation capacity, including technological, managerial and cultural innovation, external cooperation and brand promotion. Periodic reviews of the salary policy are also being carried out with reference to industry standards and regional levels, together with the strengthening of internal communication on remuneration policies. At the same time, the capacity of the technical and engineering departments is being assessed and measures are being developed to improve product and process teams, as well as reviewing and adjusting overtime policies.
- In India, improvements are being made to infrastructure and services for employees, including changing rooms, lockers and toilets, as well as their regular maintenance. Noise levels are being measured and controls are being implemented where appropriate. Workloads and overtime are also being analysed, with adjustments being made to the distribution of work and revised policies being communicated. In addition, regular audits of warehouses are being carried out and induction processes, communication of internal vacancies and promotion opportunities are being strengthened.

- In Slovakia, measures are being implemented to improve changing rooms, lockers and shower areas, including repairs, replacement of cladding and ventilation improvements. Regular cleaning of workstations, reinforcement of general facility maintenance and improvements to common areas and access to rest areas are also being planned.
- In Spain, measures are being implemented to strengthen internal communication on vacancies and promotions, training actions aimed at middle managers and noise measurements. Projects are also being developed to optimise and manage warehouses, 5S initiatives and actions to increase participation in surveys, together with the reinforcement of regular communication on the company's progress.
- In the United States, work continues on improving internal communication through regular newsletters and reviewing the salary policy to ensure its competitiveness in the local market.
- In Brazil, actions to improve the working environment continue to be developed, including regular inspections, replacement of lighting, assessment of noise and gas levels, improvement of rest areas and training programmes in leadership and internal relations.

S1-2-27 a)	*The undertaking shall disclose whether and how the perspectives of its own workforce inform its decisions or activities aimed at managing the actual and potential impacts on its own workforce. This shall include, where relevant, an explanation of:* ***(a) whether engagement occurs directly with the undertaking's own workforce or workers' representatives****.*

Communication with employees takes place mainly through the corporate scorecard and the corporate intranet. There is also a biannual internal newsletter, "*Noticias*", in which the company discusses the most significant financial, business, social and environmental developments. To gauge its employees' concerns, CIE Automotive conducts a work climate survey at each production centre every two years.

CIE Automotive's relationship with its employees is governed by ethical principles and is based on respect for people. CIE Automotive values and respects freedom of association, fostering collective bargaining through ongoing dialogue with employee representatives, both at its European plants and in countries with a weaker trade union tradition.

In 2025, 60% of its workers were covered by collective bargaining agreements. During the year, 45 collective agreements or pacts (geographical, sectoral or production centre) were signed in several of its worksites in the following countries: Spain, Slovakia, France, Czech Republic, Romania, Brazil, Mexico, China, and India. These agreements incorporate specific company obligations negotiated with its labour partners at each plant, including the importance given to essential issues such as prevention, safety and health for employees.

On the other hand, it should be noted that it is common for the agreements negotiated between companies and their unions to lead to the creation of committees made up of representatives of management and the workers at the plants, particularly in plants operating in more demanding regulatory frameworks, such as those in the EU.

These joint committees exist not only for health and safety issues, but also for other issues such as staff training. By way of example, the CIE Legazpi agreement calls for the creation of "a Joint Committee for the Company" made up of representatives of the company's management and trade union representatives, with the aim of analysing the company's training needs, as well as determining which training courses may be of interest to the company's activity and suitable for completing its workers' training, and which workers should participate in them.

S1-2-27 b) *AR 19*	*The undertaking shall disclose whether and how the perspectives of its own workforce inform its decisions or activities aimed at managing the actual and potential impacts on its own workforce. This shall include, where relevant, an explanation of:* ***(b) the stage(s) at which engagement occurs, the type of engagement and frequency of the engagement.***

Communication with employees takes place mainly through the corporate scorecard and the corporate intranet. There is also a biannual internal newsletter, in which the company discusses the most significant financial, business, social and environmental developments. To gauge its employees' concerns, CIE Automotive conducts a work climate survey at each production centre every two years.

CIE Automotive's relationship with its employees is governed by ethical principles and is based on respect for people. CIE Automotive values and respects freedom of association, fostering collective bargaining through ongoing dialogue with employee representatives, both at its European plants and in countries with a weaker trade union tradition.

In 2025, 60% of its workers were covered by collective bargaining agreements. During the year, 45 collective agreements or pacts (geographical, sectoral or production centre) were signed in several of its worksites in the following countries: Spain, Slovakia, France, Czech Republic, Romania, Brazil, Mexico, China, and India. These agreements incorporate specific company obligations negotiated with its labour partners at each plant, including the importance given to essential issues such as prevention, safety and health for employees.

Below is an example of the issues agreed in the agreement at the CIE Legazpi plant in Gipuzkoa, Spain:

- Workers' Meetings: The companies will authorise the workers to hold paid meetings, both inside and outside working hours, up to a maximum of 8 meetings and 4 hours per year. The meetings will be convened by the Works Council, on its own initiative or at the request of the Shop Steward, as stipulated in the following paragraph and up to a limit of 8 meetings and 4 hours. The Works Councils will be obliged to convene the paid meetings within the established limit, when they are requested to do so by the delegate of a Works Council Section, provided that the relevant Works Council represents at least 33% of the company's total workforce, or directly at the request of one third of its workforce. Notice of meetings will be given at least 48 hours in advance to the management of the company, stating the date of the meeting and the agenda. The time of the meeting will be fixed in agreement with the management of the company. For exceptional and justified reasons, the company may change the date of the meeting, and the workers' representatives may reduce the period of notice to 24 hours.
- Joint Committee: The Joint Committee will meet whenever 1/3 of any of the representatives request a meeting under the powers attributed to them. The Committee will meet upon a minimum of seven days before the meeting. The meeting notice must be accompanied by a written statement setting out the issue to be discussed.
- Information about the company: Companies with more than 500 employees must provide the Works Council at least quarterly information on the progress of the business, the company's production situation, the market prospects and the planned investment plan. Companies with less than 500 employees must provide the workers' representative or Works Council regular information on the situation and general progress of the company. This is without prejudice to the information obligations under section 64 of the Spanish the Workers' Statute [*Estatuto de los Trabajadores*], the Spanish Freedom of Association Act [*Ley Orgánica de Libertad Sindical*] and concordant provisions. Any confidential information provided by the management of the Company at the meetings with the Committee will be treated as secret. The members of the Works Council or workers' representatives will be obliged to keep this information secret even from the company's own employees.
- Universal guarantees: A) The right to use, with the prior knowledge of the company, a notice board to post communications of a trade union or labour nature. b) The right to be provided meeting rooms for common use, within the possibilities of each company, without prejudice to section 8 Freedom of Association Act. Works Council meetings must be notified at least 24 hours in advance, except in urgent and well-founded cases where shorter notice may be given. Works Council meetings must be scheduled sufficiently in advance. c) Before any disciplinary measure for serious or very serious misconduct and during the limitation period, the proposed sanction will be notified 24 hours in advance to: - In the case of workers' representatives, to the Works Council. In the case of trade union delegates, the local or provincial trade union to which they belong. Within 48 hours, these bodies must issue a report, which will not be binding, and the company may adopt, without further formality, the sanction it deems appropriate. This guarantee will remain in force for two years after the expiry of the mandate.

S1-2-27 c) *AR 18 and 19*	*The undertaking shall disclose whether and how the perspectives of its own workforce inform its decisions or activities aimed at managing the actual and potential impacts on its own workforce. This shall include, where relevant, an explanation of:* ***c) the function and the most senior role within the undertaking that has operational responsibility for ensuring that this engagement happens and that the results inform the undertaking's approach.***

The Manager of the production plant in question, together with the plant's Management Committee, will have operational responsibility for ensuring that this engagement happens and that the results inform the company's approach.

It must report to the corporate HR Department, which is ultimately responsible for ensuring that this engagement takes place and that the results inform the company's approach.

S1-2-27 d) *AR 20*	*The undertaking shall disclose whether and how the perspectives of its own workforce inform its decisions or activities aimed at managing the actual and potential impacts on its own workforce. This shall include, where relevant, an explanation of:* ***d) where applicable, a Global Framework Agreement or other agreements that the undertaking has with workers' representatives related to the respect of human rights of its own workforce, including an explanation of how the agreement enables the undertaking to gain insight into the perspectives of its own workforce.***

CIE Automotive's relationship with its employees is governed by ethical principles and is based on respect for people. CIE Automotive values and respects freedom of association, fostering collective bargaining through ongoing dialogue with employee representatives, both at its European plants and in countries with a weaker trade union tradition.

In 2025, 60% of its workers were covered by collective bargaining agreements. During the year, 45 collective agreements or pacts (geographical, sectoral or production centre) were signed in several of its worksites in the following countries: Spain, Slovakia, France, Czech Republic, Romania, Brazil, Mexico, China, and India. These agreements incorporate specific company obligations negotiated with its labour partners at each plant, including the importance given to essential issues such as prevention, safety and health for employees.

Below is an example of the issues agreed in the agreement at the CIE Legazpi plant in Gipuzkoa, Spain:

- Trade union guarantees: Non-discrimination. To exercise their trade union rights, workers will be guaranteed that any acts or agreements aimed at trade union discrimination will be considered null and void, specifically those entailing: a) Making the employment of a worker conditional on membership or non-membership in a central trade union. b) The employer favouring a central trade union or trade union section of a company by means of financial or other assistance. c) Dismissing workers, punishing them, discriminating against them or causing them any kind of prejudice on the grounds of their membership or non-membership in a central trade union, provided that the union complies with the legislation in force.
- Promoting equal opportunities in hiring: Prohibition of discrimination on grounds of sex or age. The signatories to this agreement, aware of the need to include women in the labour market and for this to be carried out without discrimination of any kind and with respect for equal opportunities, agree that the following are objectives for achieving equality: 1. Both women and men must enjoy equal opportunities in terms of employment, training, promotion and development in their work. 2. Women and men must receive equal pay for equal work, as well as equality in terms and conditions of employment in all other aspects of employment. Any discrimination on grounds of sex or age in matters of pay will be prohibited and different pay for employees in similar jobs in the same enterprise on grounds of sex or age will be prohibited. If an employer fails to comply with this prohibition, the discriminated employees will be entitled to the appropriate wage differentials. 3. The jobs, working practices, work organisation and working conditions must be geared in such a way that they are suitable for both women and men.
- Fifth additional provision: Promoting equal opportunities. The workers' representatives and central trade unions express the need to promote equal opportunities for women and men. To this end, they agree to create a Committee to carry out a general diagnosis of the situation in the sector, and to establish the necessary actions to raise awareness among companies, workers and employees in the sector regarding equal opportunities, favouring respect among all people and increasing the presence of women in the industrial sphere, through proactive measures in the areas of hiring, training and promotion. The Committee will resolve, within a maximum of three months, on the information to be sent to it by the companies so it can carry out the general diagnosis referred to in the previous paragraph.

S1-2-27 e)	*The undertaking shall disclose whether and how the perspectives of its own workforce inform its decisions or activities aimed at managing the actual and potential impacts on its own workforce. This shall include, where relevant, an explanation of:* ***(e) where applicable, how the undertaking assesses the effectiveness of its engagement with its own workforce, including, where relevant, any agreements or outcomes that result.***

The aim of the work climate and staff satisfaction surveys is to find out the employees' opinions on the work climate, in order to improve it and prevent possible situations of disrespect between people.

According to its procedure, the results must be received by the plant's Human Resources Department, which will work with the plant's Manager and/or Management Committee to assess the general degree of satisfaction in the company and of each of the five large blocks, and will establish the action plan to improve the results in future editions of the survey.

The results obtained will be grouped and presented in their entirety, anonymised on a personal and departmental level, and with transparency, for the company as a whole within a period of two months, always with a guarantee of privacy of the individual information received. Once the evaluation has been carried out and the results are presented to the employees, the previously defined action plan to improve the working environment will be implemented, the success of which will be evaluated in the next survey.

In 2025, 47 surveys were carried out, with an average score of 7.4 out of 10, reflecting an overall positive level of satisfaction.

The results of these surveys were instrumental in informing specific decisions and actions aimed at improving the working environment and addressing staff concerns. Although the average score reflects a positive level of overall satisfaction, detailed analysis of the different dimensions allows specific areas for action to be prioritised and the effectiveness of the measures implemented to be subsequently evaluated through successive measurements.

The main measures taken on the basis of feedback from employees include:

- In China, initiatives are being promoted to strengthen the company's competitiveness and innovation capacity, including technological, managerial and cultural innovation, external cooperation and brand promotion. Periodic reviews of the salary policy are also being carried out with reference to industry standards and regional levels, together with the strengthening of internal communication on remuneration policies. At the same time, the capacity of the technical and engineering departments is being assessed and measures are being developed to improve product and process teams, as well as reviewing and adjusting overtime policies.
- In India, improvements are being made to infrastructure and services for employees, including changing rooms, lockers and toilets, as well as their regular maintenance. Noise levels are being measured and controls are being implemented where appropriate. Workloads and overtime are also being analysed, with adjustments being made to the distribution of work and revised policies being communicated. In addition, regular audits of warehouses are being carried out and induction processes, communication of internal vacancies and promotion opportunities are being strengthened.
- In Slovakia, measures are being implemented to improve changing rooms, lockers and shower areas, including repairs, replacement of cladding and ventilation improvements. Regular cleaning of workstations, reinforcement of general facility maintenance and improvements to common areas and access to rest areas are also being planned.
- In Spain, measures are being implemented to strengthen internal communication on vacancies and promotions, training actions aimed at middle managers and noise measurements. Projects are also being developed to optimise and manage warehouses, 5S initiatives and actions to increase participation in surveys, together with the reinforcement of regular communication on the company's progress.
- In the United States, work continues on improving internal communication through regular newsletters and reviewing the salary policy to ensure its competitiveness in the local market.
- In Brazil, actions to improve the working environment continue to be developed, including regular inspections, replacement of lighting, assessment of noise and gas levels, improvement of rest areas and training programmes in leadership and internal relations.

S1-2-28	*Where applicable, the undertaking shall disclose the steps it takes to gain insight into the perspectives of people in its own workforce who may be particularly vulnerable to impacts and/or marginalised (for example, women, migrants, people with disabilities).*

Diversity management is one of the main challenges for the company, which strives to bring together people of different culture, gender, generation and ability. For this reason, the 2025 Strategic Plan called for 100% of its production plants to carry out a diversity and inclusion diagnosis to obtain an overall picture of the diversity throughout the Group and take the appropriate corrective measures.

The diagnostics are being carried out using a shared Diversity and Inclusion Tool, which assesses diversity in terms of gender, age, multiculturalism and functional diversity. This is done through diversity metrics and talent-related practices such as recruitment, hiring, promotion, training, compensation, performance and turnover, among others. In addition, a questionnaire is used to analyse plant-specific sensitivities.

The Diversity, Equity and Inclusion Committee, established in 2021 and composed of 14 representatives from all the divisions and regions, is the body in charge of these diagnostics. In situations where common problems are identified, corporate actions are being considered for implementation in the coming years, either for several plants or for the whole Group.

To adopt specific measures for potentially vulnerable groups, CIE Automotive has implemented Equality Plans in accordance with the prevailing legislation, which include specific initiatives to ensure that women's perspectives are understood and addressed at the company. These plans address issues such as work-life balance and preventing harassment at work and sexual harassment.

This protocol aims to prevent harassment from occurring in the workplace and, if it does occur, to ensure that appropriate procedures are in place to deal with the problem and prevent it from reoccurring. These measures are intended to ensure a harassment-free working environment, in which everyone respects the dignity of their colleagues, both professionally and personally.

The scope of application of this protocol is CIE Automotive. Production plants that have their own protocol in this area may apply their own specific protocol but will ensure that such protocol is consistent with the minimum measures and procedures set out in this corporate protocol.

3.1.2.3 RD S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns

S1-3-32 a) *AR 27*	*The undertaking shall describe the processes in place to cover the matters defined within paragraph 2 of the Objective section by disclosing the following information*: ***(a) its general approach to and processes for providing or contributing to remedy where it has caused or contributed to a material negative impact on people in its own workforce, including whether and how the undertaking assesses that the remedy provided is effective.***

As stated in its Human Rights Policy, CIE Automotive believes that all enterprises and organisations, including those from the public sector and those from the private sector, must make a commitment to respecting human rights, and it is therefore committed to respecting those rights during all of its activities. It applies that commitment not only to the Group's employees, but also to its customers and suppliers, and to the communities where its facilities are located, including indigenous peoples.

CIE Automotive bases its definition on the International Bill of Human Rights and also:

- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- The United Nations Guiding Principles on Business and Human Rights.
- The OECD Due Diligence Guidance.
- The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- The United Nations Sustainable Development Goals (SDGs).

Respect for human rights is one of CIE Automotive's fundamental commitments, as well as an aspect inseparably linked to the United Nations 2030 Agenda for Sustainable Development. This Policy's objective is to minimise the risk of human rights violations, by establishing principles and guidelines for due diligence in relation to those rights, so that this Policy can be used to identify, prevent, mitigate, and remedy all potential negative impacts. As a result of this, CIE Automotive's activities must include:

- Establishing commitments.
- Assigning responsibilities.
- Periodically evaluating the due diligence system's effectiveness.
- Correcting errors and improper practices.
- Providing training on the subject of human rights and promoting a culture of respect for them.

CIE Automotive's Human Rights Policy applies to all of the Group's activities, regardless of the worldwide location where they are being performed. The Company performs all of its activities in accordance with the principle of respect for human rights, and it is committed to:

- Avoiding discriminatory practices.
- Rejecting any use of forced labour or child labour.
- Offering decent employment.
- Protecting personal health.
- Facilitating collective bargaining and freedom of association.

- Encouraging a culture of respect for human rights and raising employees' awareness of this subject.
- Promoting a commitment to human rights across the entire value chain.
- Respecting the environmental rights of all the communities in which it operates, taking into account their expectations and needs.
- Respecting indigenous communities and their traditional ways of life.
- Contributing to the fight against corruption and implementing measures on protection of privacy.

CIE Automotive will include respect for human rights when assessing investment projects and analysing social and environmental impacts. It will also take that subject into consideration during its due diligence processes before entering into collaboration agreements, by evaluating the human rights policies and practices of its counterparties.

In addition, CIE Automotive's current Environmental, Social and Governance (ESG) Policy also includes the following aspects:

- Protecting the health and safety of all of the Group's personnel, and everyone else performing work at any of CIE Automotive's facilities.
- Promoting personal and professional development for everyone at CIE Automotive, giving them the necessary means (training, equality plans, and social benefits) to help them improve their capacities for initiative, creativity, and innovation, while also increasing and encouraging participation and teamwork. CIE Automotive will also ensure that all persons are complying with the Professional Code of Conduct.
- Ensuring the well-being of CIE Automotive's employees by providing equal opportunities and a positive work environment, and preventing occupational risks. Specifically, CIE Automotive is committed to maintaining an occupational risk prevention system that provides a healthy workplace.

Lastly, as indicated in its Anti-Corruption and Fraud Policy, CIE Automotive has measures in place to implement appropriate actions in accordance with labour legislation.

S1-3-32 b) *AR28*	*The undertaking shall describe the processes in place to cover the matters defined within paragraph 2 of the Objective section by disclosing the following information;* ***(b) any specific channels it has in place for its own workforce to raise their concerns or needs directly with the undertaking and have them addressed, including whether these are established by the undertaking itself and/or through participation in third-party mechanisms.***

Whistleblowing Channel:

As part of its firm commitment to ethical conduct, and as an essential element of its anti-corruption strategy, CIE Automotive has implemented and maintain a comprehensive set of ethics tools. This includes an Internal Whistleblowing System that is in full compliance with EU legislation and the highest standards existing on the subject. This includes, among other elements, an internal reporting channel known as the Whistleblowing Channel, which is made available through the corresponding online platform. There is also a set of Whistleblowing Channel Rules that have been implemented and duly distributed. These tools play a fundamental role in promoting an organisational culture based on ethics, integrity, and transparency.

The Whistleblowing Channel, which is available via an online platform accessible through the corporate website, has been designed to serve as a means of communicating information about potential legal infringements (including infringements of EU law, criminal offences, administrative infractions, occupational health and safety violations, and possible non-compliances with the Professional Code of Conduct and all the other internal rules that are part of its Compliance Management System). The Whistleblowing Channel offers various ways of communicating the information being reported, and whistleblowers may select any of those options.

In 2023, CIE Automotive strengthened its Whistleblowing Channel by installing a digital platform on its corporate website, which ensures the security of the whistleblowing process and simplifies how the Company manages each case. It is a cutting-edge and intuitive system in all the languages of the countries where the company is present, which offers the possibility of opening a secure mailbox where users can submit reports and provide complementary information in various formats (in writing, voice messages, etc.). All the information is confidential and, if the whistleblower wishes, anonymous.

The new digital channel has been implemented in accordance with the requirements of the Whistleblower Protection Act and in line with international legal requirements, which derive from Directive (EU) 2019/1937 of the European Parliament and of the Council.

Compliance with this new law has led to the modification of the Whistleblowing Channel Rules, which set out the general principles of the system and how it is managed.

Whistleblowing Channel Rules:

The Whistleblowing Channel may be used by anyone who is part of CIE Automotive, i.e., all persons professionally related to the company (employees, regardless of their status, including trainees, whether due to being shareholders, executives or members of the Board, as well as applicants in hiring processes, interns, trainees, retirees, etc.) may submit information on alleged breaches or raise queries through the internal channel, either directly or through counsel.

It may also be used by external third parties, freelancers, suppliers, contractors and subcontractors (and their employees), provided that they comply with the established requirements and procedures.

Protocol for preventing and handling harassment situations

The company has a protocol for the prevention and treatment of harassment situations with the aim of preventing harassment from occurring in the workplace and, if it does occur, to ensure that appropriate procedures are in place to deal with the problem and prevent it from reoccurring. These measures are intended to ensure a harassment-free working environment, in which everyone respects the dignity of their colleagues, both professionally and personally.

The Whistleblowing Channel includes all available avenues for people in this situation to communicate information legitimately obtained in the context of an employment or professional relationship, in relation to issues relating to gender equality and non-discrimination policies, as well as those that may constitute harassment according to the definitions contained in this document.

For matters not covered in this document, the provisions set out in the Ethics Channel Regulations will apply.

In the cases envisaged here, each plant or production centre of the Group will have its own committee, which may be made up of:

- The HR Director of the plant or production centre where the report is filed, or failing that, the HR Director of the division or the person designated by Senior Management.
- The Occupational Risk Prevention Officer.
- The Prevention Delegate or, failing this, the legal representative of the workers or, if there is no such representative or if it is impossible for them to take part in the process, the person with the longest seniority in the contract/service.

The plant or production centre committees must report all the information related to the investigation carried out to the corporate committee.

S1-3-32 c)	*The undertaking shall describe the processes in place to cover the matters defined within paragraph 2 of the Objective section by disclosing the following information;* ***(c) whether or not the undertaking has a grievance /complaints handling mechanism related to employee matters.***

Whistleblowing Channel:

As part of its firm commitment to ethical conduct, and as an essential element of its anti-corruption strategy, CIE Automotive has implemented and maintain a comprehensive set of ethics tools. This includes an Internal Whistleblowing System that is in full compliance with EU legislation and the highest standards existing on the subject. This includes, among other elements, an internal reporting channel known as the Whistleblowing Channel, which is made available through the corresponding online platform. There is also a set of Whistleblowing Channel Rules that have been implemented and duly distributed. These tools play a fundamental role in promoting an organisational culture based on ethics, integrity, and transparency.

The Whistleblowing Channel, which is available via an online platform accessible through the corporate website, has been designed to serve as a means of communicating information about potential legal infringements (including infringements of EU law, criminal offences, administrative infractions, occupational health and safety violations, and possible non-compliances with the Professional Code of Conduct and all the other internal rules that are part of its Compliance Management System). The Whistleblowing Channel offers various ways of communicating the information being reported, and whistleblowers may select any of those options.

S1-3-32 d)	*The undertaking shall describe the processes in place to cover the matters defined within paragraph 2 of the Objective section by disclosing the following information;* ***(d) the processes through which the undertaking supports the availability of such channels in the workplace of its own workforce.***

Training on the Professional Code of Conduct

As part of training the entire company on the changes in the Professional Code of Conduct, and on several of the corporate policies that derive from it, within the recurrent training on ethics and compliance, the company provided global training in two modalities: an online version, for those who have a corporate email, and an offline version, for those people who do not require a corporate email in their day-to-day work.

By the end of 2025, more than 95% of companies had launched global training in this area, thus meeting the objective set out in the ESG Strategic Plan.

This training covers the mechanisms that the company has set up to report any breach of the guidelines of the Professional Code of Conduct, including how they operate and how to use them.

Internal communications

In view of the update of its entire regulatory framework and its approval by the Board in February 2024, the company carried out both specific campaigns to launch emails to managers and senior managers, as well as global communications to all its stakeholders, including those who make up the Group, via the half-yearly corporate magazine.

S1-3-32 e) *AR 32*	*The undertaking shall describe the processes in place to cover the matters defined within paragraph 2 of the Objective section by disclosing the following information;* ***(e) how it tracks and monitors issues raised and addressed, and, how it ensures the effectiveness of the channels, including through the involvement of stakeholders who are intended users.***

Number of complaints received in 2025

In 2025, 163 complaints were received through the Whistleblowing Channel, 72 more than in 2024, although a total of 102 (63% of the total) of these reports were closed as no evidence was found to justify them during the internal investigations carried out.

The complaints received in 2025 related to:

- Bullying: 89 cases of inappropriate behaviour by senior managers towards permanent staff. Of the total 89 cases reported, 62 (70% of the total) were closed without further action, as the internal investigation found no evidence to justify them.
- Human resource management in the day-to-day work planning in the factories 19 complaints, of which nine (47% of the total) were dismissed without further action, as the internal investigation found no evidence to justify them.
- Bribery and corruption: 16 cases reported for malpractice at various plants by individuals in the Purchasing and Human Resources departments, who breached CIE Automotive's general purchasing conditions for their own benefit. Although the amounts involved were not significant, nor did the value of the contracts with the related suppliers materially affect the financial results of the plants involved, their existence affected the group's image and ethical commitment. It should be noted that eight of the reported cases (50% of the total) were dismissed because the internal investigation did not find sufficient evidence to justify the complaint.
- Discrimination: 13 cases reported in response to discriminatory situations, of which 100% were closed after internal investigations failed to find sufficient evidence to justify the complaints.
- Business management: 12 cases related to the company's operations with its stakeholders. Of this total, five were closed (42% of the total) without any action being taken, as the internal investigation did not find sufficient evidence to justify them.
- Sexual harassment: six cases of inappropriate behaviour by senior managers towards staff, of which one case was closed as the internal investigation did not find sufficient evidence to justify it.
- Breach of the Code of Professional Conduct: a total of four cases of breach of the rules of conduct by some employees. In this case too, two of the reported cases (50% of the total) were dismissed due to lack of evidence.
- Conflict of interest: three complaints received, of which two were dismissed (66% of the total) due to lack of evidence to justify them.
- Fraud: one case reported for the use of company transport services for personal gain.

In 2024, by contrast, the complaints related to human resources management in day-to-day factory work planning (40), workplace harassment (26), business management (10), bribery and corruption (four), fraud (four), non-compliance with the guidelines of the Code of Professional Conduct (three), sexual harassment (two), discrimination (one) and conflict of interest (one).

In all the cases reported in 2025 and communicated to the ESG Committee, the appropriate actions were taken to study, monitor and resolve or close the cases.

The actions may include specific training plans, conciliatory measures, disciplinary proceedings and also dismissal. In the latter case, 14 persons were dismissed due to the actions taken following the relevant internal investigations: nine persons related to cases of bullying, three in cases of sexual harassment, one person related to corruption cases, and one in relation to a report of a conflict of interest.

At the close of the 2025 financial year, 19 complaints remain pending as the required investigation is ongoing.

In 2024, 10 individuals were dismissed as a result of the actions taken: three individuals related to cases of moral harassment, two with complaints of breach of the Code of Professional Conduct, two with cases of sexual harassment, two with cases of personnel management, and one individual related to a complaint of conflict of interest.

In addition, employees from the Management Team and the relevant HR departments mediated to resolve reported cases of bullying, sexual harassment and discrimination, and to prevent their recurrence, by further educating employees on the company's values and the guidelines of the Professional Code of Conduct. External professionals also helped carry out detailed investigations in those cases where required.

S1-3-33 *AR 31*	*The undertaking shall describe the processes in place to cover the matters defined within paragraph 2 of the Objective section by disclosing the following information;* ***(e) how it tracks and monitors issues raised and addressed, and, how it ensures the effectiveness of the channels, including through the involvement of stakeholders who are intended users.***

Training on the Professional Code of Conduct

As part of training the entire company on the changes in the Professional Code of Conduct, and on several of the corporate policies that derive from it, within the recurrent training on ethics and compliance, the company provided global training in two modalities: an online version, for those who have a corporate email, and an offline version, for those people who do not require a corporate email in their day-to-day work.

By the end of 2025, more than 95% of companies had launched global training in this area, thus meeting the objective set out in the ESG Strategic Plan.

This training covers the mechanisms that the company has set up to report any breach of the guidelines of the Professional Code of Conduct, including how they operate and how to use them.

The basic principles on which the Internal System is based are: communication, anonymous reporting, truthfulness, presumption of innocence, confidentiality, effective protection, proportionality, impartiality, fairness, the right to a hearing, equal opportunities, data protection and non-retaliation.

As indicated in both the Professional Code of Conduct and the Rules themselves, any kind of direct or indirect retaliation against those who have made due use of the Whistleblowing Channel, in good faith, is prohibited, and attempted or consummated retaliation against those who have reported in good faith will be definitively sanctioned.

The prohibition of retaliation will not prevent the adoption of appropriate disciplinary measures when the internal investigation determines that the information communicated through the internal channel is false and that the reporting person has made the report knowing it to be false and acting in bad faith.

Whistleblowing Channel Rules

Security and confidentiality measures

CIE Automotive will ensure that all necessary technical and organisational measures are taken to preserve the security of the data collected to protect them from unauthorised disclosure or access.

In this respect, whistleblowers may decide whether they want to identify themselves when making a report. Anonymous complaints are therefore admissible. In any case, maximum confidentiality will be guaranteed regarding the identity of the informants who initially or subsequently wish to identify themselves.

To this end, CIE Automotive has adopted appropriate measures to guarantee the confidentiality of all the data and will ensure that the data relating to the identity of the whistleblower is not disclosed to the accused during the investigation, while respecting the person's fundamental rights, without prejudice to any action that may be taken by the competent judicial authorities. The identity of the whistleblower may only be disclosed to the administrative and judicial authorities, where legally appropriate, for the proper handling of any administrative or judicial proceedings that may arise from the complaint lodged.

In this regard, the identity of the reporting person will only be known to the persons in charge of managing the System and investigating the report, as well as to the areas that are strictly necessary for the investigation of the facts and resolution of the reports made. Lastly, persons who, by reason of their duties, have knowledge of the complaints made, are personally bound to keep all information to which they have access secret.

Avoiding discriminatory practices

Since 2020, CIE Automotive has had a Harassment Prevention and Treatment Protocol in place, which is mandatory at all Group facilities. This protocol addresses the prevention of mobbing, sexual harassment, discriminatory harassment (on grounds of sex, gender or other discriminatory grounds), acts of violence in the workplace and cyberbullying.

It includes a number of preventive measures, such as zero tolerance of harassment, making all employees responsible for monitoring conduct at work, and implementing communication programmes. The full protocol is available on the corporate website under "Protocol for the Prevention and Treatment of Harassment Situations".

3.1.2.4 RD S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

S1-4-37	*The undertaking shall provide a summarised description of the action plans and resources to manage its material impacts, risks, and opportunities related to its own workforce in accordance with ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.*

The company's action plans and resources to manage its material impacts, risks and opportunities are integrated into its strategic planning and supported by its senior executives and management.

CIE Automotive's Risk Management System (SGR) provides reasonable assurance of the prevention, identification, assessment and ongoing monitoring of all the material risks, covering strategic, operational, financial, environmental, social and governance (ESG) aspects, as well as compliance. These risks, approved by the Board, are managed in accordance with the established risk appetite and tolerance levels.

The model, included under the Risk Control and Management Policy, follows ISO 31000 methodology and is under the direct responsibility of the Board, which has delegated its supervision and correct functioning to the Audit and Compliance Committee.

With a sustained commitment from senior management and the executive team, backed by rigorous strategic planning, CIE Automotive seeks to create an environment where risks can be managed in a controlled manner. The objective is to manage these risks actively so that, through appropriate management and value generation, new opportunities will arise.

To gauge its employees' concerns, CIE Automotive conducts a work climate survey at each production centre every two years. Workplace climate and staff satisfaction surveys aim to gather employees' opinions on the workplace climate in order to improve it and prevent any situations of disrespect between people.

In 2025, 47 surveys were carried out, with an average score of 7.4 out of 10, reflecting an overall positive level of satisfaction.

The main measures taken on the basis of feedback from employees include:

- In China, initiatives are being promoted to strengthen the company's competitiveness and innovation capacity, including technological, managerial and cultural innovation, external cooperation and brand promotion. Periodic reviews of the salary policy are also being carried out with reference to industry standards and regional levels, together with the strengthening of internal communication on remuneration policies. At the same time, the capacity of the technical and engineering departments is being assessed and measures are being developed to improve product and process teams, as well as reviewing and adjusting overtime policies.

- In India, improvements are being made to infrastructure and services for employees, including changing rooms, lockers and toilets, as well as their regular maintenance. Noise levels are being measured and controls are being implemented where appropriate. Workloads and overtime are also being analysed, with adjustments being made to the distribution of work and revised policies being communicated. In addition, regular audits of warehouses are being carried out and induction processes, communication of internal vacancies and promotion opportunities are being strengthened.
- In Slovakia, measures are being implemented to improve changing rooms, lockers and shower areas, including repairs, replacement of cladding and ventilation improvements. Regular cleaning of workstations, reinforcement of general facility maintenance and improvements to common areas and access to rest areas are also being planned.
- In Spain, measures are being implemented to strengthen internal communication on vacancies and promotions, training actions aimed at middle managers and noise measurements. Projects are also being developed to optimise and manage warehouses, 5S initiatives and actions to increase participation in surveys, together with the reinforcement of regular communication on the company's progress.
- In the United States, work continues on improving internal communication through regular newsletters and reviewing the salary policy to ensure its competitiveness in the local market.
- In Brazil, actions to improve the working environment continue to be developed, including regular inspections, replacement of lighting, assessment of noise and gas levels, improvement of rest areas and training programmes in leadership and internal relations.

S1-4-38 a) *AR 42*	*In relation to the material impacts related to its own workforce, the undertaking shall describe*: ***(a) actions taken, planned or underway to prevent or mitigate material negative impacts on its own workforce***.

Since its inception, the Company has striven to offer attractive pay and benefit packages, as well as safe working conditions negotiated with employee representatives. Thus, the training hours the company offers its employees are in line with best practices in the sector, its accident rate is comparatively low, and its working conditions in terms of working hours and remuneration are generally better than the thresholds set by each government.

In addition, employee satisfaction is assessed every two years and, where appropriate, action plans are implemented to improve the weaknesses of each production plant based on the results of these climate surveys, with a view to making CIE Automotive more attractive to potential new employees on a daily basis.

Therefore, although the availability of human resources for growth is in itself a risk, the Company has demonstrated its ability to integrate talent from acquired companies inorganically, and make it part of the talent available even at the corporate level. In fact, this has already happened on several occasions throughout the company's history, given that the current heads of the company's main business divisions were once employees of companies acquired by CIE Automotive, thereby ensuring that the employees it incorporates inorganically become part of its corporate talent pool and consequently assume new corporate responsibilities, in addition to those of an inorganic nature.

S1-4-38 b)	*In relation to the material impacts related to its own workforce, the undertaking shall describe*: ***b) whether and how it has taken action to provide or enable remedy in relation to an actual material impact.***

The aim of the work climate and staff satisfaction surveys is to find out the employees' opinions on the work climate, in order to improve it and prevent possible situations of disrespect between people.

According to its procedure, the results must be received by the plant's Human Resources Department, which will work with the plant's Manager and/or Management Committee to assess the general degree of satisfaction in the company and of each of the five large blocks, and will establish the action plan to improve the results in future editions of the survey.

The results obtained will be grouped and presented in their entirety, anonymised on a personal and departmental level, and with transparency, for the company as a whole within a period of two months, always with a guarantee of privacy of the individual information received. Once the evaluation has been carried out and the results are presented to the employees, the previously defined action plan to improve the working environment will be implemented, the success of which will be evaluated in the next survey.

In 2025, 47 surveys were carried out, with an average score of 7.4 out of 10, reflecting an overall positive level of satisfaction.

The main measures taken on the basis of feedback from employees include:

- In China, initiatives are being promoted to strengthen the company's competitiveness and innovation capacity, including technological, managerial and cultural innovation, external cooperation and brand promotion. Periodic reviews of the salary policy are also being carried out with reference to industry standards and regional levels, together with the strengthening of internal communication on remuneration policies. At the same time, the capacity of the technical and engineering departments is being assessed and measures are being developed to improve product and process teams, as well as reviewing and adjusting overtime policies.
- In India, improvements are being made to infrastructure and services for employees, including changing rooms, lockers and toilets, as well as their regular maintenance. Noise levels are being measured and controls are being implemented where appropriate. Workloads and overtime are also being analysed, with adjustments being made to the distribution of work and revised policies being communicated. In addition, regular audits of warehouses are being carried out and induction processes, communication of internal vacancies and promotion opportunities are being strengthened.
- In Slovakia, measures are being implemented to improve changing rooms, lockers and shower areas, including repairs, replacement of cladding and ventilation improvements. Regular cleaning of workstations, reinforcement of general facility maintenance and improvements to common areas and access to rest areas are also being planned.
- In Spain, measures are being implemented to strengthen internal communication on vacancies and promotions, training actions aimed at middle managers and noise measurements. Projects are also being developed to optimise and manage warehouses, 5S initiatives and actions to increase participation in surveys, together with the reinforcement of regular communication on the company's progress.
- In the United States, work continues on improving internal communication through regular newsletters and reviewing the salary policy to ensure its competitiveness in the local market.
- In Brazil, actions to improve the working environment continue to be developed, including regular inspections, replacement of lighting, assessment of noise and gas levels, improvement of rest areas and training programmes in leadership and internal relations.

S1-4-38 c) *AR 42*	*In relation to the material impacts related to its own workforce, the undertaking shall describe:* ***(c) any additional actions or initiatives it has in place with the primary purpose of delivering positive impacts for its own workforce.***

Diversity

Diversity management is one of the main challenges for the company, which strives to bring together people of different culture, gender, generation and ability. For this reason, the 2025 ESG Strategic Plan called for 100% of its plants to carry out a diversity and inclusion diagnosis to obtain an overall picture of the diversity throughout the Group and take the appropriate corrective measures.

The diagnostics were carried out using a shared Diversity and Inclusion Tool, which assesses diversity in terms of gender, age, multiculturalism and functional diversity. This is done through diversity metrics and talent-related practices such as recruitment, hiring, promotion, training, compensation, performance and turnover, among others.

In addition, a questionnaire is used to analyse plant-specific sensitivities. The Diversity, Equity and Inclusion Committee, established in 2021 and composed of 14 representatives from all the divisions and regions, is the body in charge of these diagnostics. In situations where common problems are identified, corporate actions are being considered for implementation in the coming years, either for several plants or for the whole Group.

Support for workers

- Over EUR 20 million in private insurance or medical services.
- Over EUR 9 million in food services.
- Around EUR 8 million in transport-related benefits.
- Approximately EUR 0.5 million in education.

Ulysses Programme

This is an initiative that combines employee mobility and attraction. Through it, young professionals from various plants and nationalities participate in a training centre of excellence in the Basque Country, and then continue their training in the group's flagship plants in Spain, Mexico and Italy. The programme achieves four key goals: internalising the group's values, facilitating future communication between countries, fostering intra-group relations, and obtaining highly trained employees.

Labour climate surveys

In 2025, 47 surveys were carried out, with an average score of 7.4 out of 10, reflecting an overall positive level of satisfaction.

The results of these surveys were instrumental in informing specific decisions and actions aimed at improving the working environment and addressing staff concerns. Although the average score reflects a positive level of overall satisfaction, detailed analysis of the different dimensions allows specific areas for action to be prioritised and the effectiveness of the measures implemented to be subsequently evaluated through successive measurements.

The main measures taken on the basis of feedback from employees include:

- In China, initiatives are being promoted to strengthen the company's competitiveness and innovation capacity, including technological, managerial and cultural innovation, external cooperation and brand promotion. Periodic reviews of the salary policy are also being carried out with reference to industry standards and regional levels, together with the strengthening of internal communication on remuneration policies. At the same time, the capacity of the technical and engineering departments is being assessed and measures are being developed to improve product and process teams, as well as reviewing and adjusting overtime policies.
- In India, improvements are being made to infrastructure and services for employees, including changing rooms, lockers and toilets, as well as their regular maintenance. Noise levels are being measured and controls are being implemented where appropriate. Workloads and overtime are also being analysed, with adjustments being made to the distribution of work and revised policies being communicated. In addition, regular audits of warehouses are being carried out and induction processes, communication of internal vacancies and promotion opportunities are being strengthened.
- In Slovakia, measures are being implemented to improve changing rooms, lockers and shower areas, including repairs, replacement of cladding and ventilation improvements. Regular cleaning of workstations, reinforcement of general facility maintenance and improvements to common areas and access to rest areas are also being planned.
- In Spain, measures are being implemented to strengthen internal communication on vacancies and promotions, training actions aimed at middle managers and noise measurements. Projects are also being developed to optimise and manage warehouses, 5S initiatives and actions to increase participation in surveys, together with the reinforcement of regular communication on the company's progress.
- In the United States, work continues on improving internal communication through regular newsletters and reviewing the salary policy to ensure its competitiveness in the local market.
- In Brazil, actions to improve the working environment continue to be developed, including regular inspections, replacement of lighting, assessment of noise and gas levels, improvement of rest areas and training programmes in leadership and internal relations.

S1-4-38 d) *AR 38 and 39*	*In relation to the material impacts related to its own workforce, the undertaking shall describe:* ***(d) how it tracks and assesses the effectiveness of these actions and initiatives in delivering outcomes for its own workforce.***

The response to this indicator is provided under *S1-4-38 b)* above.

S1-4-39 *AR 34*	*In relation to paragraph 36, the undertaking shall describe the processes through which it identifies what action is needed and appropriate in response to a particular actual or potential negative impact on its own workforce.*

The Professional Code of Conduct provides for monitoring mechanisms and procedures in case of non-compliance. Thus, it establishes that the Board's ESG Committee is responsible for supervising the proper implementation of the Professional Code of Conduct and details how queries should be made and irregularities and breaches should be reported through the Whistleblowing Channel.

As included in the response *to S1-3-32 e) AR 32*, the actions may include specific training plans, conciliation, disciplinary proceedings and also dismissals. In the latter case, 14 people were dismissed as a result of the actions taken following the relevant internal investigations: nine people related to cases of moral harassment, three to cases of sexual harassment, one person related to cases of corruption and one person related to the report of a conflict of interest.

S1-4-40 a) AR 44, 45 and 47	*In relation to material risks and opportunities, the undertaking shall describe*: ***(a) what action is planned or underway to mitigate material risks for the undertaking arising from its impacts and dependencies on its own workforce and how it tracks effectiveness in practice***.

CIE Automotive has not identified any cases of forced or child labour in its workforce. This is monitored through internal audits and regular human rights related surveys. The Professional Code of Conduct, which applies to both employees and suppliers, establishes an explicit commitment against any form of labour exploitation. In addition, the company has implemented confidential reporting mechanisms that allow employees to report possible violations without fear of retaliation, which reinforces compliance with these standards and mitigates reputational and legal risks.

CIE Automotive has identified key skills shortages and high staff turnover as material risks in its Risk Map. To mitigate these risks, a set of actions focused on talent retention and skills development has been implemented. These measures include:

- Continuous training programmes, which ensure that employees can develop the necessary skills to meet new challenges.
- Career plans and internal promotion, such as the Professional Development Programme (PDP), which seeks to retain quality talent and align employees' skills with the company's needs.
- International exchanges through the Ulysses Programme, which helps increase inter-cultural and leadership competencies among the workforce.

CIE Automotive is committed to paying fair wages to all Group employees, regardless of where they work. This fact is duly reflected in our Human Rights Policy which, in addition to laying out CIE Automotive's commitment to protecting people's health, avoiding discriminatory practices and rejecting the use of forced and child labour, it has also committed to offering decent employment, undertaking to provide its employees fair pay commensurate with their skills and expertise, to comply with labour legislation wherever it operates, to guarantee its employees' right to rest regardless of the legal framework in force and, as far as possible, to establish measures aimed at flexible working hours.

In addition to their wages, the company also supports its employees with a range of benefits, which improve their quality of life and that of their families and create a sense of belonging among employees. These support measures have resulted in an investment of over EUR 37 million in 2025.

S1-4-40 b)	*In relation to material risks and opportunities, the undertaking shall describe*: ***(b) what action is planned or underway to pursue material opportunities for the undertaking in relation to its own workforce***.

- The Ulysses programme has been maintained with more than 15 participants from four different nationalities, consolidating the fulfilment of the programme's strategic objective one year ahead of the deadline (2025).
- Increase in the percentage of plants with ISO 45001 certification to 100% of certifiable plants, which includes all those in the group except those acquired or developed after 2020, the date of publication of our 2025 ESG Strategic Plan, and those in which we have divested in recent years.
- Training of all group executives in environmental, social and good governance issues, achieving the strategic objective one year ahead of the deadline (2025). 100% of the members of the plant management committees have been trained in ESG, excluding plants acquired or developed after 2020, the date of publication of our ESG 2025 Strategic Plan, and those in which we have divested in recent years.
- Diversity and Inclusion diagnostics completed at 100% of the Group's sites, reaching the strategic objective one year ahead of the target date (2025). This achievement reaffirms the Company's commitment to inclusion and diversity.
- After exceeding 20% female representation for the first time in 2023 and reaching 22% in 2024, in 2025 the proportion of women in the workforce stands at 21%. This slight year-on-year variation does not alter the structural trend of progress in gender diversity within the company, in a context marked by the specific difficulties faced by the industrial sector in attracting and retaining female talent.
- Conducting diversity diagnostics at all of the Company's sites every two years to monitor and continuously track compliance with diversity and inclusion standards.
- Continuing to increase the percentage of women and other groups that may be under-represented in the Group.
- Detection of new training needs and increasing the training offered to all groups.

For more details on the requirements of *MDR-A 69* and *MDR-T 80*, please refer to the tables of objectives for datapoint *S1-5-46*, which are related to these actions.

S1-4-41	*The undertaking shall disclose whether and how it ensures that its own practices do not cause or contribute to material negative impacts on own workforce, including, where relevant, its practices in relation to procurement, sales and data use. This may include disclosing what approach is taken when tensions arise between the prevention or mitigation of material negative impacts and other business pressures.*

Data protection and security

CIE Automotive works in partnership with its customers to offer innovative solutions. Given the nature of this work, it is crucial to ensure the confidentiality of sensitive information, both at corporate and divisional level. To this end, it is implementing a project to protect information, guided by the following guidelines:

- Compliance with international reference standards, including ISO 27001, ISO 27005 and ISO/IEC 27002/2005. CIE Automotive's central engineering department in Spain obtained TISAX certification in 2021, which is based on ISO27001 criteria, and in 2022 and 2023 it extended this certification to several countries.
- Process re-engineering and social engineering tailored to the specific needs of the organisation.
- Real-time management of information security status. In 2025, no significant fines were imposed for non-compliance with data protection laws and regulations. Nor were any fines imposed as a result of legal proceedings relating to marketing and labelling infringements during the reference period, in millions of the reference currency. The Chief Information Officer is the chief executive responsible for security, acting as the CIO.

Sending and receiving CVs

The data sent to the Corporate Portal by persons interested in sending their CVs will at all times receive the most appropriate treatment in accordance with the General Data Protection Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data.

Candidates expressly consent to the Company processing, whether automatically or not, the personal data they send to the Company's portal, including any operations and technical procedures of an automated nature or not, which allow for collection, recording, storage, processing, modification, blocking and cancellation. Candidates also consent to having their personal data transferred, for the purposes of the proper implementation and control of the Group's global human resources policies, to any of the Group's companies that the company deems appropriate, including those located abroad.

In all other cases, CIE Automotive will not transfer candidates' personal data to other persons or entities, whether private or public, without their prior consent. The candidates' personal data will be kept for a period of six months. After that, the personal data will be deleted. However, this period may be renewed by candidates when they enter into the portal and update their data.

General privacy policy

INFORMATIVE CONTENT

In accordance with the General Data Protection Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 ("the GDPR"), the purpose of this Privacy Policy is to outline the manner in which CIE Automotive collects, processes and protects the personal data of persons accessing or using its services.

DATA CONTROLLER

- CIE AUTOMOTIVE S.A.
- Tax Identification Number: A20014452
- Postal address: Alameda Mazarredo 69, 8° - 48009 Bilbao (Bizkaia), Spain
- Telephone no.: +34 946 054 835
- Email address: gdpr@cieautomotive.com

PURPOSES OF THE PERSONAL DATA PROCESSING

CIE Automotive processes the personal data collected for the provision of services to customers and for its relations with suppliers, and also for the provision of its own services to potential customers and the security of the buildings and assets of CIE Automotive. For each of the services offered, the users will find a specific information policy at this privacy portal regarding how the personal data requested from them will be processed to perform the service involved.

SOURCES OF THE DATA

The personal data collected comes directly from the information provided by the data subjects.

ACCURACY AND VERACITY OF THE DATA PROVIDED

Users of CIE Automotive's services warrant and are liable, in all cases, for the accuracy, validity and authenticity of the personal data they provide, and they agree to keep them duly updated.

STORAGE

The personal data provided will be kept for as long as they are necessary to meet the purposes for which, in each case, they were collected to maintain the data subject's relationship or link with CIE AUTOMOTIVE, and their deletion is not requested by the data subject. They will also be retained in accordance with the limitation periods for complying with legal obligations incumbent on CIE Automotive.

LEGAL BASIS. LEGAL BASIS FOR USING THE DATA:

CIE Automotive will be entitled to process the data in accordance with Article 6 GDPR, relating to ordinary data, and the data subject will be informed of the lawful title(s) by which it may provide each service, which may be consent, the performance of a legal relationship to which the data subject is a party, compliance with a legal obligation, or the legitimate interest of CIE Automotive in performance of its services and competencies.

RECIPIENTS

During the processing of personal data, CIE Automotive will not transfer the data unless required by law or following authorisation of the data subject, which will be requested where necessary, informing the data subject of the consequences of not transferring the data and more specifically, the impossibility of providing the service in question.

RIGHTS:

CIE Automotive facilitates the data subjects' exercise of the following rights connected to processing of their personal data:

- The right to request access to their personal data, and the right to know which personal data are being processed and the processing operations carried out on them.
- The right to request their rectification or erasure.
- The right to request restriction of processing of their personal data where the accuracy, lawfulness or necessity of the data processing is in doubt, in which case the data may be retained for the purpose of pursuing or defending against claims.
- The right to object to the processing of personal data, where the lawful basis for processing them is a legitimate interest. The Company will stop processing the data, unless it has a compelling legitimate interest otherwise, or to bring, exercise or defend against claims.
- The right to data portability, when the legal basis for processing the data is the existence of a contractual relationship or the data subject's consent.
- Right to revoke consent.

Data subjects have the right to obtain confirmation of whether CIE Automotive is processing the personal data that affect them, and if it is, to access their personal data, and to request to have any imprecise data rectified, or if applicable, to request to have them erased for reasons such as the data no longer being necessary for the purposes for which they were collected. In certain circumstances, data subjects may also request to have the processing of their data restricted. In these cases, they will only be retained to exercise or defend against claims. In certain circumstances and on grounds relating to their particular situation, data subjects may object to the processing of their data.

In that case, CIE Automotive will stop processing the data, except where legitimate purposes prevail, or to exercise or defend against possible claims. Data subjects who have given consent for a specific purpose have the right to withdraw their consent at any time, without affecting the lawfulness of the processing based on the consent before its withdrawal.

Any of these rights may be asserted by writing to CIE Automotive at: Alameda Mazarredo 69, 8º - 48009 Bilbao (Bizkaia), or by email at gdpr@cieautomotive.com, indicating the right being asserted and the data subject's identification details.

S1-4-43	*The undertaking shall disclose what resources are allocated to the management of its material impacts, with information that allows users to gain an understanding of how the material impacts are managed.*

As mentioned in the responses to various indicators throughout this Sustainability Statement, the Company's Management Plan is coordinated with and linked to its Strategic Plan.

The Company's Strategic Plan calls for EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. The OpEx is mainly linked to the group's R&D activities and was incorporated into its strategic lines. However, it should be noted that the figures given are for the Strategic Plan as a whole and not just for one action or just for the Human Resources area.

The company's OpEx for this specific action is not material and is included in the amounts indicated in this paragraph. In addition, the Company's corporate and plant human resources departments have employees dedicated to managing these IROs. In particular, there are over 100 people from the organisation involved, including plant and corporate employees.

3.1.3 Metrics and targets

3.1.3.1 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S1-5-46	*The summarised description of the targets set to manage its material impacts, risks and opportunities related to the undertaking's own workforce shall contain the information requirements defined in ESRS 2 MDR-T.*

CIE Automotive has maintained solid and consistent performance in 2025 in its social commitments, which form part of its material sustainability issues. During the financial year, the company has consolidated the progress made in previous years in key areas such as the Ulysses programme, ESG training for management and the completion of diversity and inclusion assessments across all the group's plants.

Likewise, in 2025, the roll-out of ISO 45001 certification was completed, reaching 100% of certifiable plants and fully meeting the objective set out in the 2025 ESG Strategic Plan.

Taken together, these results reflect that the company has not only maintained the level of performance achieved in previous years but has also successfully completed one of the main milestones remaining on its social roadmap, consolidating the fulfilment of its strategic objectives ahead of the 2025 deadline.

2025 MILESTONES

- The Ulysses programme has been maintained with more than 15 participants of four different nationalities, consolidating the fulfilment of the programme's strategic objective one year ahead of the deadline (2025).
- Increase in the percentage of plants with ISO 45001 certification to 100% of certifiable plants, which includes all those in the group except those acquired or developed after 2020, the date of publication of our 2025 ESG Strategic Plan, and those in which we have divested in recent years. With this milestone, the company has achieved its last remaining objective and is now 100% compliant with the 2025 ESG Strategic Plan, as the rest of the objectives had already been achieved in previous years.
- Training of all group executives in environmental, social and governance issues, achieving the strategic objective one year ahead of the deadline (2025). 100% of the members of the plant management committees have been trained in ESG, excluding plants acquired or developed after 2020, the date of publication of our ESG 2025 Strategic Plan, and those in which we have divested in recent years.
- Diversity and Inclusion Diagnostics completed at 100% of the group's plants, achieving the strategic objective one year ahead of the deadline (2025). This achievement reaffirms the company's commitment to inclusion and diversity.

- After exceeding 20% female representation for the first time in 2023 and reaching 22% in 2024, in 2025 the proportion of women in the workforce stands at 21%. This slight year-on-year variation is part of a clearly positive medium- and long-term trend, considering that female representation stood at 14%–16% in the period 2015–2019, increased to 18% in 2020–2022 and has exceeded the 20% threshold since 2023. Overall, these results reflect structural progress in gender diversity within the company, in a context marked by the specific difficulties faced by the industrial sector in attracting and retaining female talent.

Target	**Ulysses Programme**
Description	A training programme designed to develop talent (2025 target: 15 students and 3 countries) from different geographical areas where the Group operates. Training is provided at prestigious educational centers near the headquarters, as well as in Group plants that share technology with the participant's home plant, both in Spain and in Mexico and Italy.
Target	Extension of the programme to a minimum of 15 students from at least 3 countries.
Target level	Absolute target.
Material impacts, risks and opportunities	Training policies that promote professional development and career growth.
Scope	CIE Automotive Group
Base year	2020
Target Year	2025
Period	Annual
Hypotheses	The hypotheses and assumptions are those established in the Group's risk analysis.
Affected stakeholders	Professionals, Human Resources.
Performance	Achieved. By 2023, more than 3 countries and over 15 students had already participated.

Target	**ISO 45001 Certification**
Description	The Group aims to certify all plants that were within the Group's perimeter at the beginning of the Plan (2020) under ISO 45001.
Target	Obtaining ISO 45001 certification for 100% of certifiable plants.
Target level	Absolute target.
Material impacts, risks and opportunities	Increase in frequency and severity rates, as well as workplace accidents.
Scope	CIE Automotive Group.
Base year	2020
Target Year	2025
Period	Annual.
Hypotheses	The hypotheses and assumptions are those established in the Group's risk analysis.
Affected stakeholders	Value Chain Workers, Shareholders, Financiers, Professionals, Customers, Business Partners, Suppliers, Society, Administration and the Sector.
Performance	100% of certifiable plants have been certified.

Target	**ESG Training for Management Committees**
Description	A training programme designed to educate all members of plant Management Committees on Environmental, Social, and Governance (ESG) topics.
Target	Training of 100% of Management Committee members in ESG matters.
Target level	Absolute target.
Material impacts, risks and opportunities	- Training policies that promote professional development and career growth. - Cases of violence or harassment due to discrimination (racial, gender, or sexual) within the company, although these are managed through the harassment protocol. - Lack of female representation at entry-level positions, where their presence is lower than in senior management or on the Board of Directors. - Vulnerable workers due to modern slavery practices within company facilities.
Scope	CIE Automotive Group.
Base year	2020
Target Year	2025
Period	Annual.
Hypotheses	The hypotheses and assumptions are those established within the Group's risk analysis.
Affected stakeholders	Management Committees, HR.
Performance	Achieved. By 2024, all members of plant Management Committees had been trained in ESG matters.

Target	**Diversity & Inclusion Diagnostics**
Description	A training programme designed to educate all members of plant Management Committees on Environmental, Social, and Governance (ESG) topics.
Target	100% of the Group's plants with diversity and inclusion diagnostics.
Target level	Absolute target.
Material impacts, risks and opportunities	- Training policies that promote professional development and career growth. - Cases of violence or harassment due to discrimination (racial, gender, or sexual) within the company, although these are managed through the harassment protocol. - Lack of female representation at entry-level positions, where their presence is lower than in senior management or on the Board of Directors. - Vulnerable workers due to modern slavery practices within company facilities.
Scope	CIE Automotive Group.
Base year	2020
Target Year	2025
Period	Annual.
Hypotheses	The hypotheses and assumptions are those established within the Group's risk analysis.
Affected stakeholders	Professionals, Management Committees, Human Resources.
Performance	Achieved. By 2024, all members of plant Management Committees had been trained in ESG matters.

CHALLENGES FOR 2026

- Continue to increase the percentage of women and other groups that may be underrepresented in the group.
- Reduction in accidents and improvement in associated indices, as in previous years.
- Identification of new training needs and increase in training offered to all groups.
- Work towards obtaining ISO 45001 certification for those plants that have been recently acquired or that were not included in the 2025 ESG Plan because they were not within its scope.

- Consider implementing a benchmark to understand the context of each country in terms of attracting and retaining local talent and conclude on the Group's relative position in each country in terms of talent.

S1-5-47 a)	*The undertaking shall disclose the process for setting the targets, including whether and how the undertaking engaged directly with its own workforce or workers' representatives in:* ***(a) setting any such targets****.*

CIE Automotive uses its dual materiality analysis to identify impacts and set targets. It also works to get all of its workers involved through the various channels for receiving proposals, so it can set benchmarks and adapt its internal policies, procedures and requirements.

CIE Automotive gathers its employees' opinions about their employment situation through various channels, the most recurrent of which are the corporate intranet, the biannual work climate surveys conducted at all the plants, and the half-yearly newsletter.

Likewise, most of the plants have their own agreements and regular meetings are held with workers' representatives to discuss various labour issues and to learn about concerns in the social sphere.

S1-5-47 b)	*The undertaking shall disclose the process for setting the targets, including whether and how the undertaking engaged directly with its own workforce or workers' representatives in:* ***(b) tracking the undertaking's performance against them.***

The response to this indicator is included throughout the responses provided for *S1-2-27, S1-2-27 (a), (b), (c)* and *(d)*.

S1-5-47 c)	*The undertaking shall disclose the process for setting the targets, including whether and how the undertaking engaged directly with its own workforce or workers' representatives in:* ***(c) identifying any lessons or improvements as a result of the undertaking's performance.***

The response to this indicator is included throughout the responses provided for *S1-2-27, S1-2-27 (a), (b), (c)* and *(d)* and *S1-4-38 (a), (b), (c)* and *(d)*.

3.1.3.2 RD S1-6 – Characteristics of the undertaking's employees

S1-6-50 a) *AR 57*	*In addition to the information required by paragraph 40(a)iii of ESRS 2 General Disclosures, the undertaking shall disclose:* ***(a) the total number of employees by head count, and breakdowns by gender and by country for countries in which the undertaking has 50 or more employees representing at least 10% of its total number of employees.***

	2024	2025
Sex	**Number of employees (head count)**	**Number of employees (head count)**
Men	19,038	20,437
Women	5,292	5,454
Others	0	0
Not notified	0	0
Total number of employees	**24,330**	**25,891**

Significant countries	2024 Number of employees (headcount)				2025 Number of employees (headcount)			
	Men	Women	Others	Not notified	Men	Women	Other	Not notified
BRAZIL	3,106	885	0	0	3,708	1,377	0	0
SPAIN	2,064	490	0	0	1,971	450	0	0
INDIA	6,275	96	0	0	7,771	131	0	0
MEXICO	3,584	2,075	0	0	3,264	1,826	0	0

S1-6-50 b)	*In addition to the information required by paragraph 40(a)iii of ESRS 2 General Disclosures, the undertaking shall disclose:* ***(b) the total number by head count or full time equivalent (FTE) of: i. permanent employees, and breakdown by gender; ii. temporary employees, and breakdown by gender; and iii. non-guaranteed hours employees, and breakdown by gender.***

	2024					2025				
	Men	Women	Others	Not disclosed	Total	Men	Women	Other	Not disclosed	Total
Permanent employees	16,836	4,487	0	0	21,323	16,712	4,666	0	0	21,378
Temporary employees	2,202	805	0	0	3,007	3,725	788	0	0	4,513
Total	**19,038**	**5,292**	**0**	**0**	**24,330**	**20,437**	**5,454**	**0**	**0**	**25,891**

	2024					2025				
Head count	**Women**	**Men**	**Other**	**Not disclosed**	**Total**	**Women**	**Men**	**Other**	**Not disclosed**	**Total**
Number of employees	5,292	19,038	0	0	24,330	5,454	20,437	0	0	25,891
Number of permanent employees	4,487	16,836	0	0	21,323	4,666	16,712	0	0	21,378
Number of temporary employees	805	2,202	0	0	3,007	788	3,725	0	0	4,513
Number of non-guaranteed hours employees	0	0	0	0	0	0	0	0	0	0
Number of full-time employees	5,237	18,972	0	0	24,209	5,394	20,342	0	0	25,736
Number of part-time employees	55	66	0	0	121	60	95	0	0	155

Data on number of people in 2024	ASIA	BRAZIL	EUROPE	NORTH AMERICA	TOTAL
Number of employees	7,638	3,991	5,783	6,918	24,330
Number of permanent employees	6,223	3,825	5,582	5,693	21,323
Number of temporary employees	1,415	166	201	1,225	3,007
Number of non-guaranteed hours employees	0	0	0	0	0
Number of full-time employees	7,638	3,958	5,696	6,917	24,209
Number of part-time employees	0	33	87	1	121

Data on number of people in 2025	ASIA	BRAZIL	EUROPE	NORTH AMERICA	TOTAL
Number of employees	9,046	5,085	5,490	6,270	25,891
Number of permanent employees	6,057	4,959	5,340	5,022	21,378
Number of temporary employees	2,989	126	150	1,248	4,513
Number of non-guaranteed hours employees	0	0	0	0	0
Number of full-time employees	9,046	5,019	5,403	6,268	25,736
Number of part-time employees	0	66	87	2	155

Note: The evolution of the number of employees and their different breakdowns in 2025 responds to the adaptation of the workforce to the Group's production needs in different regions. It should also be noted that part of the increase observed in Asia is due to the inclusion in the workforce calculation of participants in apprenticeship programmes (NAPS) in India, who in previous years were formally remunerated by government entities and were therefore not included as Group employees, whereas in 2025 their remuneration is now paid directly by CIE Automotive plants.

S1-6-50 c) *AR 59*	*In addition to the information required by paragraph 40(a)iii of ESRS 2 General Disclosures, the undertaking shall disclose:* ***(c) the total number of employees who have left the undertaking during the reporting period and the rate of employee turnover in the reporting period.***

In the corresponding report issued in 2024, the Group showed the total turnover rate for permanent employees and the voluntary turnover rate for permanent employees, which stood at 24% and 15% respectively. In 2025, these indicators stand at 23% and 10% respectively, a particularly positive result given the evolution of the voluntary turnover rate for permanent employees, which has fallen by 5 points in one financial year (from 15% to 10%) and is particularly significant in that it shows a decrease in voluntary departures from the Group.

Likewise, the voluntary turnover rate for both permanent and temporary employees stands at 15% in 2025, 4 points below the rate for the previous year.

With regard to the total turnover rate, it should be noted that, although it has actually fallen significantly this year, the inclusion, as mentioned in other sections of the report, of apprentices in India (NAPS) in the Group's workforce has kept the turnover rate at 40%, 2 points below the previous year's rate.

S1-6-50 d) *AR 60*	*In addition to the information required by paragraph 40(a)iii of ESRS 2 General Disclosures, the undertaking shall disclose:* ***d) a description of the methodologies and assumptions used to compile the data.***

The employee information is collected on a monthly basis through reports sent by each plant. These reports include information on employees based on two main criteria: Full-Time Equivalent (FTE) and headcount.

The FTE is reported for direct, structural and indirect labour categories. "FTE" means full-time equivalence, which makes it possible to standardise the analysis of the workforce, regardless of the different working hours that employees may have.

The headcount is used to report the hires, dismissals and headcount at the end of each month. This information is broken down by type of contract (permanent or temporary), type of working day (full or part-time), as well as by gender and age group. This provides a clear and accurate picture of the active employees and staffing fluctuations.

All the data received are reviewed internally at Corporate, where it is audited to ensure that it meets established standards of accuracy and consistency. Once they have been verified, the data are consolidated to provide an overview of the organisation's human resources status at the end of each month.

S1-6-50 d) i.	*In addition to the information required by paragraph 40(a)iii of ESRS 2 General Disclosures, the undertaking shall disclose:* ***d) a description of the methodologies and assumptions used to compile the data, including whether the numbers are reported: i. in head count or full-time equivalent (FTE) (including an explanation of how FTE is defined).***

The response to this indicator is included under *S1-6-50 (d)* above.

S1-6-50 d) ii.	*In addition to the information required by paragraph 40(a)iii of ESRS 2 General Disclosures, the undertaking shall disclose:* ***d) a description of the methodologies and assumptions used to compile the data, including whether the numbers are reported: ii. at the end of the reporting period, as an average across the reporting period, or using another methodology.***

Personnel data are collected on a monthly basis, with the plants reporting at the close of each month. The data are usually sent in around the tenth working day of the following month, ensuring that the figures reflect the staffing situation at the end of each reporting period.

S1-6-50 e)	*In addition to the information required by paragraph 40(a)iii of ESRS 2 General Disclosures, the undertaking shall disclose:* ***(e) where applicable, a provision of contextual information necessary to understand the data (for example, to understand fluctuations in number of employees during the reporting period).***

High employee turnover was mainly observed in the Indian, US and Mexican plants. In India, most of the employees who left were on temporary contracts due to local legislation limiting the duration of employment and for personal reasons of the workers. In the US, the turnover was high due to factors such as reduced customer orders, competition in the labour market, and the labour-intensive nature of the work. In Mexico, the turnover is influenced by fluctuations in customer requirements, internal restructuring and labour supply in the region. These factors contribute to variations in the number of employees during the year.

S1-6-50 f)	*In addition to the information required by paragraph 40(a)iii of ESRS 2 General Disclosures, the undertaking shall disclose:* ***(e) where applicable, a provision of contextual information necessary to understand the data (for example, to understand fluctuations in number of employees during the reporting period).***

The information on the total number of employees included in indicator *S1-6-50 a) AR 57* is included in Note 22 to the Consolidated Financial Statements for the year ended 31 December 2025.

S1-6-52 a)	*The undertaking may disclose by head count or full time equivalent (FTE) the following information:* ***(a) full-time employees, and breakdowns by gender and by region.***

Number of full-time employees by gender	**2024**	**2025**
Women	5,237	5,394
Men	18,972	20,342
Other	0	0
Not reported	0	0
Total	**24,209**	**25,736**

Number of full-time employees by region	2024	2025
ASIA	7,638	9,046
BRAZIL	3,958	5,019
EUROPE	5,696	5,403
NORTH AMERICA	6,917	6,268
TOTAL	**24,209**	25,736

S1-6-52 b)	*The undertaking may disclose by head count or full time equivalent (FTE) the following information:* ***(b) part-time employees, and breakdowns by gender and by region.***

Number of full-time employees by gender	2024	2025
Women	55	60
Men	66	95
Other	0	0
Not reported	0	0
Total	**121**	**155**

Number of full-time employees by region	2024	2025
ASIA	0	0
BRAZIL	33	66
EUROPE	87	87
NORTH AMERICA	1	2
TOTAL	**121**	**155**

3.1.3.3 DR S1-7 - Characteristics of non-employees in the undertaking's own workforce

S1-7-55 a)	*The disclosure required by paragraph 53 shall include: A disclosure of the total number of non-employees in the undertaking's own workforce, i.e., either people with contracts with the undertaking to supply labour ("self-employed people") or people provided by undertakings primarily engaged in "employment activities" (NACE Code N78).*

CIE Automotive assessed the capacity to collect information on the total number of non-employees in its workforce, i.e., people who have contracts with the company to supply labour ("self-employed people") or people provided by undertakings primarily engaged in "employment activities" (NACE code N78), applying an approach based on the principle of reasonable effort, which takes into account both the level of impact and the availability of resources, ensuring an appropriate balance between the quality of the information reported and the feasibility of the data collection effort.

In this second year of implementation of the Directive, information will not be reported on the total number of non-employees in the undertaking's own workforce, i.e., either people with contracts with the undertaking to supply labour ("self-employed people") or people provided by undertakings primarily engaged in "employment activities" (NACE Code N78) due to the application of Delegated Regulation 2025/1416 ("quick fix") published in the OJEU on November 10, 2025, which amends the delegated regulation adopting the ESRS, in particular, for first-phase companies, it freezes and delays the application of the transitional provisions by two years.

S1-7-55 b) i	*The disclosure required by paragraph 53 shall include:* ***b) an explanation of the methodologies and assumptions used to compile the data, including whether the number of non-employees is reported: i. in headcount or full-time equivalent (FTE) (including a definition of how FTE is defined).***

The employee information is collected on a monthly basis through reports sent by each plant. These reports include information on employees based on two main criteria: Full-Time Equivalent (FTE) and headcount.

The methodology applied is explained in the response to indicator *S1-6-50 (d) AR 60.*

S1-7-55 b) i	*The disclosure required by paragraph 53 shall include:* ***b) an explanation of the methodologies and assumptions used to compile the data, including whether the number of non-employees is reported: ii. at the end of the reporting period, as an average across the reporting period, or using another methodology.***

The methodology applied is explained in the response to indicator *S1-6-50 (d) AR 60.*

S1-7-55 c) AR 64 and 65	*The disclosure required by paragraph 53 shall include:* ***(c) where applicable, a provision of contextual information necessary to understand the data (for example, significant fluctuations in the number of non-employees in the undertaking's own workforce during the reporting period and between the current and the previous reporting period).***

CIE Automotive has assessed the ability to collect information relating to a provision of contextual information necessary to understand the data (for example, significant fluctuations in the number of non-employees in the undertaking's own workforce during the reporting period and between the current and the previous reporting period), applying an approach based on the principle of reasonable effort, which takes into account both the level of impact and the availability of resources, ensuring an appropriate balance between the quality of the information reported and the feasibility of the data collection effort.

In this second year of implementation of the directive, information will not be reported relating to a provision of contextual information necessary to understand the data (for example, significant fluctuations in the number of non-employees in the undertaking's own workforce during the reporting period and between the current and the previous reporting period) due to the application of Delegated Regulation 2025/1416 ("quick fix") published in the OJEU on November 10, 2025, which amends the delegated regulation adopting the ESRS, in particular, for first-phase companies, it freezes and delays the application of the transitional provisions by two years.

S1-7-56 AR 62	*Related to the information on non-employees, the undertaking may disclose the most common types of non-employees (for example, self-employed people, people provided by undertakings primarily engaged in employment activities, and other types relevant to the undertaking), their relationship with the undertaking, and the type of work that they perform.*

The most common non-salaried employees at CIE Automotive are workers hired through temporary employment agencies, mainly for direct labour. This type of contracting allows the company to respond quickly to fluctuations in demand, optimise operational resources and guarantee the continuity of production operations according to the specific needs of each period.

S1-7-57 AR 63	*Where data is not available, the undertaking shall estimate the number and state that it has done so, When the undertaking performs estimates, it shall describe the basis of preparation of this estimation.*

The response to this indicator is conditioned by what was stated above under *S1-7-55(a)* and *S1-7-55(c) AR 64 and 65.*

3.1.3.4 DR S1-8 – Collective bargaining coverage and social dialogue

S1-8-60 a) AR 66	*The undertaking shall disclose:* ***(a) the percentage of its total employees covered by collective bargaining agreements.***

In 2025, 60% of CIE Automotive's total workforce is covered by collective agreements, maintaining the previous year's trend and reflecting a sustained increase since 2019, when this percentage stood at 53%.

S1-8-60 b)	*The undertaking shall disclose:* ***(b) in the EEA, whether it has one or more collective bargaining agreements and, if so, the overall percentage of its employees covered by such agreement(s) for each country in which it has significant employment, defined as at least 50 employees by head count representing at least 10% of its total number of employees.***

In the European Economic Area (EEA), Spain is the only country where CIE Automotive has significant employment, with 25 of its production plants covered by collective bargaining agreements. In this context, 94% of the employees in Spain are covered by collective agreements. The remaining small percentage corresponds to office employees who, although not formally included in collective bargaining agreements, enjoy working conditions and wages that are above the standards set out in these agreements.

	Collective Bargaining Coverage		Social Dialogue
Coverage Rate	Employees – EEA (for countries with >50 empl. representing >10% total empl.)	Employees – Non-EEA (for countries with >50 empl. representing >10% total empl.)	Workplace representation (EEA only)(for countries with >50 empl. representing >10% total empl.)
0 – 19%			
20 – 39%		India	
40 – 59%			
60 – 79%		Mexico	
80 – 100%	Spain	Brazil	Spain

S1-8-60 c)	*The undertaking shall disclose:* ***(c) outside the EEA, the percentage of its own employees covered by collective bargaining agreements by region.***

Outside the European Economic Area (EEA), CIE Automotive discloses the percentage of employees covered by collective bargaining agreements in each region where it operates. A detailed breakdown is given below:

	2024			2025		
Countries outside the EEA	**Headcount at the end of the year**	**Number of employees covered by collective bargaining agreements**	**Percentage of employees covered by collective bargaining agreements**	**Headcount at the end of the year**	**Number of employees covered by collective bargaining agreements**	**Percentage of employees covered by collective bargaining agreements**
BRAZIL	3,991	3,826	96%	5,085	4,957	97%
CHINA	1,261	359	28%	1,138	385	34%
SOUTH KOREA	6	0	0%	6	0	0%
INDIA	6,371	2,672	42%	7,902	2,609	33%
MOROCCO	61	0	0%	56	0	0%
MEXICO	5,659	3,854	68%	5,090	3,374	66%
RUSSIA	14	0	0%	7	0	0%
US	1,259	0	0%	1,180	0	0%

S1-8-61	*For employees not covered by collective bargaining agreements, the undertaking may disclose whether it determines their working conditions and terms of employment based on collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other undertakings.*

In general, for employees not covered by collective bargaining agreements, CIE Automotive determines their working conditions and terms of employment based on the collective bargaining agreements covering other employees at the company or on benchmark collective bargaining agreements of other companies, and in most of these cases, these terms actually exceed the terms of the collective bargaining agreement,

S1-8-62	*Disclose the extent to which the working conditions and terms of employment of non-employees in its own workforce are determined or influenced by collective bargaining agreements, including an estimate of the coverage rate.*

CIE Automotive ensures that the working conditions and terms of employment of the non-salaried employees linked to its workforce comply with prevailing labour legislation and, where applicable, with the relevant collective bargaining agreements. The Company works closely with its suppliers to promote responsible labour practices that contribute to the well-being and protection of workers.

S1-8-63 a) *AR 69*	*The undertaking shall disclose the following information in relation to social dialogue:* ***(a) the global percentage of employees covered by workers' representatives, reported at the country level for each EEA country in which the undertaking has significant employment.***

With regard to social dialogue, 100% of the employees at CIE Automotive's production plants in Spain (the only EEA country with significant employment), are covered by workers' representatives.

S1-8-63 b)	*The undertaking shall disclose the following information in relation to social dialogue:* ***(b) the existence of any agreement with its employees for representation by a European Works Council (EWC), a Societas Europaea (SE) Works Council, or a Societas Cooperativa Europaea (SCE) Works Council.***

CIE Automotive does not have any agreements with its employees for representation by a European Works Council (EWC), a Societas Europaea (SE) Works Council, or a Societas Cooperativa Europaea (SCE) Works Council.

3.1.3.5 DR S1-9 - Diversity metrics

S1-9-66 a)	*The undertaking shall disclose:* ***(a) the gender distribution in number and percentage at top management level.***

Senior management is composed of 10 people, 6 of whom are men (60%) and 4 of whom are women (40%). Included under Senior Management are the 10 persons who form part of the Group's Executive Committee, as shown on the Group's corporate website in the section on *Key Management - Steering Committee Composition*, where the company's Chief Executive Officer is considered to be part of Senior Management and is also an executive member of the Board of Directors.

S1-9-66 b)	*The undertaking shall disclose:* ***(b) the distribution of employees by age group: under 30 years old; 30-50 years old; over 50 years old.***

Age group	2024	%	2025	%
Under 30	5,562	23%	6,718	26%
Between 30 and 50	14,431	59%	14,540	56%
Over 50	4,337	18%	4,633	18%

3.1.3.6 DR S1-10 - Adequate wages

S1-10-69 *AR 72 and 74*	*The undertaking shall disclose whether all its employees are paid an adequate wage, in line with applicable benchmarks. If so, stating this will be sufficient to fulfil this disclosure requirement and no further information is needed.*

CIE Automotive is committed to paying fair wages to all Group employees, regardless of where they work. This fact is duly reflected in CIE Automotive's Human Rights Policy which, in addition to laying out its commitment to protecting people's health, avoiding discriminatory practices and rejecting the use of forced and child labour, it has also committed to offering decent employment, undertaking to provide its employees fair pay commensurate with their skills and expertise, to comply with labour legislation wherever it operates, to guarantee its employees' right to rest regardless of the legal framework in force and, as far as possible, to establish measures aimed at flexible working hours,

This policy is signed by all the plant managers and human resources directors.

As part of the controls established in relation to a living wage, CIE Automotive verifies the wage situation of the employees of the companies it acquires in the first year of acquisition, to ensure that the wages of the lowest paid employee exceed local minimums, and to obtain evidence, albeit limited, that the pay offered by the companies it acquires is at least reasonable in the market in which they operate.

In this regard, in the case of Brazilian companies CIE Autometal Piracicaba and CIE Engrecon acquired in 2025, the analysis shows that the lowest wage at each plant is above the legal minimum. At CIE Autometal Piracicaba, both the lowest-paid male and female employees earn 1.0 times the local minimum wage. At CIE Engrecon, the male employee with the lowest salary also earns 1.0 times the legal minimum, while the female employee with the lowest salary earns 1.4 times the local minimum wage. This ratio is calculated as follows: lowest salary vs, local minimum wage, i.e., the local minimum is always taken as a reference and compared with the lowest salary at the plant.

S1-10-70	*If not all its employees are paid an adequate wage in line with applicable benchmarks, the undertaking shall disclose the countries where employees earn below the applicable adequate wage benchmark and the percentage of employees that earn below the applicable adequate wage benchmark for each of these countries.*

All of CIE Automotive's salaried employees receive an appropriate wage in line with the applicable benchmarks in the countries in which it operates. Therefore, there are no countries in which non-salaried employees are paid below the applicable adequate wage benchmark.

3.1.3.7 DR S1-11 - Social protection

S1-11-74 a) *AR 75*	*The undertaking shall disclose whether all its employees are covered by social protection, through public programs or through benefits offered by the undertaking, against loss of income due to any of the following major life events:* ***(a) sickness.***

CIE Automotive’s employees are covered by social protection against loss of income in the event of illness in accordance with the legislation of the country in which they work. The fact that most of CIE Automotive's plants are located in places with high levels of social protection means that most of CIE Automotive's employees do have sickness cover.

It should be noted here that the Group has numerous agreements with mutual insurance companies and organisations responsible for covering these eventualities.

S1-11-74 b) *AR 75*	*The undertaking shall disclose whether all its employees are covered by social protection, through public programs or through benefits offered by the undertaking, against loss of income due to any of the following major life events:* ***(b) unemployment starting from when the own worker is working for the undertaking.***

CIE Automotive’s employees are covered by social protection against loss of income in the event of unemployment in accordance with the legislation of the country in which they work. The fact that most of CIE Automotive's plants are located in places with high levels of social protection means that most of CIE Automotive's employees do have unemployment cover.

S1-11-74 c) *AR 75*	*The undertaking shall disclose whether all its employees are covered by social protection, through public programs or through benefits offered by the undertaking, against loss of income due to any of the following major life events:* ***(c) employment injury and acquired disability.***

CIE Automotive’s employees are covered by social protection against loss of income in the event of occupational injury and disability in accordance with the legislation of the country in which they work. The fact that most of CIE's plants are located in places with high levels of social protection (Europe, North and South America, etc.) means that most of CIE Automotive's employees are covered by unemployment insurance.

It should be noted here that as a result of negotiations with workers' representatives, many of the plants have private life and accident insurance that covers these events.

S1-11-74 d) *AR 75*	*The undertaking shall disclose whether all its employees are covered by social protection, through public programs or through benefits offered by the undertaking, against loss of income due to any of the following major life events:* ***(d) parental leave.***

CIE Automotive’s employees are covered by social protection against loss of income in the event of parental leave in accordance with the legislation of the country in which they work. The fact that most of CIE's plants are in locations with high levels of social protection (Europe, North and South America, etc.) means that most CIE Automotive employees do have parental leave coverage and, it should be noted, many of the Group's plant agreements provide for additional coverage or extra bonuses in the event of the birth of a child.

S1-11-74 e) *AR 75*	*The undertaking shall disclose whether all its employees are covered by social protection, through public programs or through benefits offered by the undertaking, against loss of income due to any of the following major life events:* ***(e) retirement.***

CIE Automotive’s employees are covered by social protection against loss of income in the event of retirement in accordance with the legislation of the country in which they work. The fact that most of CIE's plants are located in places with high levels of social protection (Europe, North and South America, etc.) means that most of CIE Automotive's employees have pensions. In addition, the Group's contributions to private retirement plans to supplement its employees' pensions are many and varied, for example, GEROA in certain plants in the Basque Country.

3.1.3.8 DR S1-12 - Persons with disabilities

S1-12-79	*The undertaking shall disclose the percentage of persons with disabilities amongst its employees, subject to legal restrictions on the collection of data.*

In line with the previous year, at year-end 2025, the percentage of CIE Automotive employees with disabilities was, subject to the legal restrictions on data collection, 1.2%.

S1-12-80	*The undertaking may disclose the percentage of employees with disabilities with a breakdown by gender.*

	2024			2025		
Employees with disabilities	**Men**	**Women**	**Total**	**Men**	**Women**	**Total**
Number	194	63	257	223	85	308
Percentage	1.0%	1.2%	1.1%	1.1%	1.6%	1.2%

The information on people with disabilities employed by CIE Automotive is compiled on a monthly basis through reports sent by each plant to the corporate Human Resources Department.

These reports include month-end staffing data, including the number of workers with disabilities broken down by professional category and gender.

It should be noted that definitions and legal requirements related to the employment of persons with disabilities vary from country to country. In some cases, plants are subject to local laws that require them to employ a minimum number of people with disabilities depending on the size of the company (e.g., in Brazil and the EEA countries).

It should also be mentioned that hiring persons with disabilities is not the only means of integrating this community into the Company, since in several countries of the Group, tasks are often subcontracted to Special Employment Centres or similar entities that directly hire persons with disabilities who subsequently provide the Group various services.

3.1.3.9 DR S1-13 - Training and Skills Development Metrics

S1-13-83 a) *AR 77*	*The disclosure required by paragraph 81 shall include:* ***(a) the percentage of employees that participated in regular performance and career development reviews; such information shall be broken down by gender.***

	2024			2025		
Employees with reviews	**Men**	**Women**	**Total**	**Men**	**Women**	**Total**
Percentage	44%	50%	45%	41%	44%	42%

S1-13-83 b) *AR 78*	*The disclosure required by paragraph 81 shall include:* ***(b) the average number of training hours per employee and by gender.***

2024	TOTAL TRAINING HOURS			TOTAL NUMBER OF PEOPLE TRAINED			HOURS PER TRAINED EMPLOYEE			HOURS PER EMPLOYEE		
Region	**M**	**W**	**TOTAL**	**M**	**W**	**TOTAL**	**M**	**W**	**TOTAL**	**M**	**W**	**TOTAL**
ASIA	186,550	23,251	**209,802**	5,634	339	**5,973**	33.1	68.6	**35.1**	25.7	62.0	**27.5**
BRAZIL	120,160	46,427	**166,587**	2,716	579	**3,295**	44.2	80.2	**50.6**	38.7	52.5	**41.7**
EUROPE	127,423	64,830	**192,254**	3,744	1,417	**5,161**	34.0	45.8	**37.3**	30.0	42.4	**33.2**
NORTH AMERICA	150,641	87,809	**238,450**	4,012	2,381	**6,393**	37.5	36.9	**37.3**	34.1	35.1	**34.5**
TOTAL	**584,775**	**222,318**	**807,093**	**16,106**	**4,716**	**20,822**	**36.3**	**47.1**	**38.8**	**30.7**	**42.0**	**33.2**

M: Men // W: Women

2025	TOTAL TRAINING HOURS			TOTAL NUMBER OF PEOPLE TRAINED			HOURS PER TRAINED EMPLOYEE			HOURS PER EMPLOYEE		
Region	**M**	**W**	**TOTAL**	**M**	**W**	**TOTAL**	**M**	**W**	**TOTAL**	**M**	**W**	**TOTAL**
ASIA	141,819	17,974	**159,793**	6,317	374	**6,691**	22.5	48.1	**23.9**	16.4	45.7	**20.9**
BRAZIL	140,284	101,336	**241,619**	3,587	967	**4,554**	39.1	104.8	**53.1**	37.8	73.6	**60.5**
EUROPE	133,733	60,876	**194,609**	3,068	1,414	**4,482**	43.6	43.1	**43.4**	33.4	41.0	**33.7**
NORTH AMERICA	158,867	91,419	**250,287**	3,554	2,202	**5,756**	44.7	41.5	**43.5**	39.0	41.5	**36.2**
TOTAL	**574,703**	**271,605**	**846,308**	**16,526**	**4,957**	**21,483**	**34.8**	**54.8**	**39.4**	**30.2**	**51.3**	**34.8**

M: Men // W: Women

S1-13-84 AR 79	*The undertaking may disclose breakdowns by employee category for the percentage of employees that participated in regular performance and career development and for the average number of training hours per employee.*

	2024	**2025**
Employee category	**Average hours of training**	**Average hours of training**
Senior management	118	103
Degree holders	37	44
Supervisors	36	34
CIE Automotive Average	**39**	**39**

	2024	**2025**
Employee category	**Percentage participating in performance reviews**	**Percentage participating in performance reviews**
Senior management	86%	79%
Degree holders	71%	65%
Supervisors	31%	29%
CIE Automotive Average	**45%**	**42%**

3.1.3.10 DR S1-14 - Health and Safety Metrics

S1-14-88 a) AR 80	*The undertaking shall disclose information on the extent to which its own workforce is covered by its health and safety management system and the number of incidents associated with work-related injuries, ill health and fatalities of its own workforce. In addition, it shall disclose the number of fatalities as a result of work-related injuries and work-related ill health of other workers working on the undertaking's sites:* ***(a) the percentage of people in its own workforce who are covered by the undertaking's health and safety management system based on legal requirements and/or recognised standards or guidelines.***

By the end of 2025, CIE Automotive will have 100% of the certifiable production plants included in the scope of the 2025 ESG Strategic Plan with ISO 45001 certification. This scope includes the plants dedicated to the manufacture of automotive components that were part of the Group at the time of publication of the Plan in 2020, excluding those acquired or developed subsequently, as well as those divested in subsequent financial years.

The total number of people employed in these plants amounts to 23,507, representing 91% of the Group's total workforce. Consequently, it can be confirmed that 91% of the workforce is covered by a health and safety management system based on recognised standards, compared to 95% in the previous financial year, due to changes in the scope and the incorporation of personnel not included in the scope of ISO 45001 certification.

S1-14-88 b) *AR 82 and 91*	*The undertaking shall disclose information on the extent to which its own workforce is covered by its health and safety management system and the number of incidents associated with work-related injuries, ill health and fatalities of its own workforce. In addition, it shall disclose the number of fatalities as a result of work-related injuries and work-related ill health of other workers working on the undertaking's sites:* ***(b) the number of fatalities as a result of work-related injuries and work-related ill health,*** *The information for (b) shall also be reported for other workers working on the undertaking's sites, such as value chain workers if they are working on the undertaking's sites.*

CIE Automotive regrets the death in 2025 of an employee as a result of injuries sustained in the workplace.

The tables below show this data for the company's own staff. In addition, it has been verified that there have been no deaths among workers in the value chain operating at the company's sites.

	2024	2025
Number of accidents	361	417
Number of occupational illnesses	23	18

	Accidents by severity			
Year	**Minor**	**Severe**	**Fatal**	**Total**
2024	351	10	0	361
2025	410	6	1	417

Occupational illnesses by sex and region:

	2024			2025		
Region	**Men**	**Women**	**Total**	**Men**	**Women**	**Total**
ASIA	0	0	0	1	0	1
BRAZIL	3	1	4	3	1	4
EUROPE	13	6	19	10	3	13
NORTH AMERICA	0	0	0	0	0	0
TOTAL	**16**	**7**	**23**	**14**	**4**	**18**

S1-14-88 c) *AR 89 and 91*	*The undertaking shall disclose information on the extent to which its own workforce is covered by its health and safety management system and the number of incidents associated with work-related injuries, ill health and fatalities of its own workforce. In addition, it shall disclose the number of fatalities as a result of work-related injuries and work-related ill health of other workers working on the undertaking's sites:* ***(c) the number and rate of recordable work-related accidents.***

	2024	2025
Number of accidents	361	417
Frequency rate	6.74	7.57

Accidents that do not cause sick leave and/or are of an in itinere nature are not included in the table above and are reported separately.

S1-14-88 d)	*The undertaking shall disclose information on the extent to which its own workforce is covered by its health and safety management system and the number of incidents associated with work-related injuries, ill health and fatalities of its own workforce. In addition, it shall disclose the number of fatalities as a result of work-related injuries and work-related ill health of other workers working on the undertaking's sites:* ***(d) with regard to the undertaking's employees, the number of cases of recordable work-related ill health, subject to legal restrictions on the collection of data.***

In 2025, CIE Automotive recorded 18 cases of work-related health problems, 5 fewer than at the end of the previous year.

S1-14-88 e)	*The undertaking shall disclose information on the extent to which its own workforce is covered by its health and safety management system and the number of incidents associated with work-related injuries, ill health and fatalities of its own workforce. In addition, it shall disclose the number of fatalities as a result of work-related injuries and work-related ill health of other workers working on the undertaking's sites:* ***(e) with regard to the undertaking's employees, the number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health.***

In 2025, CIE Automotive recorded 7,170 days lost, 68 fewer than the previous year, due to work-related injuries and/or health problems.

S1-14-89	*Disclose the information specified in points (d) and (e) of paragraph 88 with regard to non-employees.*

CIE Automotive has assessed the ability to collect information with respect to non-employees on the number of cases of recordable work-related health problems, subject to legal restrictions on data collection, and the number of days lost due to work-related injuries and deaths due to work-related accidents, work-related health problems and deaths due to health problems, applying an approach based on the principle of reasonable effort, which takes into account both the level of impact and the availability of resources, ensuring an appropriate balance between the quality of the information reported and the feasibility of the data collection effort.

In this second year of implementation of the Directive, the information will not be reported on the number of cases of recordable work-related health problems, subject to legal restrictions on data collection, and the number of days lost due to work-related injuries and deaths due to occupational accidents, work-related health problems and deaths due to health problems due to the application of Delegated Regulation 2025/1416 ("quick fix") published in the OJEU on 10 November 2025, which amends the delegated regulation adopting the ESRS, in particular for first-phase companies, freezing and delaying the application of the transitional provisions by two years.

CIE Automotive is fully committed to the health and safety of all its employees and associates. Through strict safety policies, training programmes and advanced management systems, CIE Automotive constantly works to minimise occupational hazards and ensure a safe and healthy working environment for all its workforce.

S1-14-90	*In addition, the undertaking may include the following additional information on the health and safety coverage: the percentage of its own workers covered by a health and safety management system which is based on legal requirements and/or recognised standards or guidelines and which has been internally audited and/or audited or certified by an external party.*

At the end of 2025, CIE Automotive had 100% of its plants certified under IS0 45001. These plants employ a total of 23,507 people, representing 91% of the Group's total workforce. Therefore, it can be confirmed that 91% of the workforce is covered by the health and safety management system based on recognised standards, compared to 95% in the previous year, due to changes in the scope and the incorporation of personnel not included in the scope of ISO 45001 certification.

3.1.3.11 DR S1-15 - Work-Life Balance Metrics

S1-15-93 a) AR 96 and 97	*The disclosure required by paragraph 91 shall include:* ***(a) the percentage of employees entitled to take family-related leave.***

As in the previous financial year, 100% of CIE Automotive employees are entitled to take leave for family reasons, in accordance with national legislation and/or the collective agreements applicable at each plant. The applicability of this leave varies according to local regulations and the specific agreements at each plant.

S1-15-93 b)	*The disclosure required by paragraph 91 shall include:* ***(b) the percentage of entitled employees that took family-related leave, and a breakdown by gender.***

100% of CIE Automotive's employees are entitled to take family leave under national legislation and/or the collective bargaining agreements applicable at each plant. This leave is tailored to the individual needs of each employee and the operational particularities of each worksite. In 2025, as in the previous year, the leave was used in line with the company's work and social context.

S1-15-94	*If all of the undertaking's employees are entitled to family-related leave through social policy and/or collective bargaining agreements, it is sufficient to disclose this in order to meet the requirement of paragraph 93 (a).*

As stated under *S1-15-93 a) AR 96 and 97*, all of CIE Automotive's employees are entitled to take family leave under national legislation and/or the collective bargaining agreements applicable at each plant. The applicability of this leave varies according to local legislation and plant-specific agreements.

3.1.3.12 DR S1-16 - Remuneration metrics (pay gap and total remuneration)

S1-16-97 a) AR 98 and 100	*The disclosure required by paragraph 95 shall include:* ***(a) the gender pay gap, defined as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees.***

In 2025, the wage gap was 4.7%: women earn on average 4.7% less per hour than men.

	2024			2025		
	Men	**Women**	**Wage**	**Men**	**Women**	**Wage**
Remuneration in average EUR per hour	8.71	8.11	6.88%	8.74	8.33	4.69%

Wage gap formula: ((8.74– 8.33) /8.74) x 100 = 4.69%

S1-16-97 b) AR 101	*The disclosure required by paragraph 95 shall include:* ***(b) the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual).***

Total remuneration (thousand EUR)	**2024**	**2025**
CEO	EUR 5,923 thousand	EUR 8,083 thousand
Median for all employees	EUR 17 thousand	EUR 18 thousand
Ratio	**347**	**446**

S1-16-97 c) AR 99 and 102	*The disclosure required by paragraph 95 shall include:* ***(c) where applicable, any contextual information necessary to understand the data and how the data has been compiled and other changes to the underlying data that are to be considered.***

As for the contextual information needed to understand the data and how it was collected, this year, as in the previous year, the gender pay gap analysis is carried out considering the hours worked, in accordance with the definition established in the required disclosure.

The study covers 100% of the perimeter, which is dynamic due to the incorporation of new plants and the exit of others. These changes in the perimeter may influence the results, as each new addition or adjustment in the Group's structure may have an impact on the overall composition of the data analysed. Also, the CEO's remuneration has not been included in the pay gap calculation, as there is no woman in a comparable position within the organisation.

3.1.3.13 RD S1-17 – Incidents, complaints and severe human rights impacts

S1-17-103 a) AR 103 and 106	*The undertaking shall disclose:* ***(a) the total number of incidents of discrimination, including harassment, reported in the reporting period.***

Since 2020, CIE Automotive has had a Harassment Prevention and Treatment Protocol in place, which is mandatory at all Group facilities. This protocol addresses the prevention of mobbing, sexual harassment, discriminatory harassment (on grounds of sex, gender or other discriminatory grounds), acts of violence in the workplace and cyberbullying.

It includes a number of preventive measures, such as zero tolerance of harassment, making all employees responsible for monitoring conduct at work, and implementing communication programmes. The full protocol is available on the corporate website.

In 2025, there were 108 incidents of harassment in total, including harassment as contemplated in the protocol, of which 76 (70% of the total) were closed due to insufficient evidence having been found after the relevant internal investigation, as indicated in the Whistleblowing Channel Rules.

- Bullying: 89 cases of inappropriate behaviour by senior managers towards permanent staff. Of the total 89 cases reported, 62 (70% of the total) were closed without further action, as the internal investigation found no evidence to justify them.
- Discriminatory: 13 cases reported involving discriminatory treatment, of which 100% were closed because the internal investigation did not find sufficient evidence to justify the complaints.
- Sexual harassment: six cases of inappropriate behaviour by senior managers towards permanent staff, of which one case was closed as the internal investigation found no evidence to justify the allegations.

The actions taken due to internal investigations may include specific training plans, conciliatory measures, disciplinary proceedings and also dismissal. In the latter case, 12 persons were dismissed due to actions taken following the relevant internal investigations: nine in relation to the bullying cases and three in relation to the sexual harassment cases.

It should be borne in mind that when CIE Automotive acquires new companies, as was the case this year with the Brazilian plants CIE Autometal Piracicaba and CIE Engrecon, for example, the plant's Manager and HR Director are asked to sign the Protocol and the Human Rights Policy to confirm their assent to them, so that, from the outset, both the Protocol and the Human Rights Policy apply to the newly acquired plants.

In 2024, on the other hand, there were 29 complaints related to incidents of harassment as covered by the protocol, 26 of which were for harassment at work, two for sexual harassment and one for discrimination.

S1-17-103 b) AR 103 and 106	*The undertaking shall disclose*: ***(b) the number of complaints filed through channels for people in the undertaking's own workforce to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for OECD Multinational Enterprises related to the matters defined in paragraph 2 of this Standard, excluding those already reported in (a) above.***

In 2025, zero complaints were filed through channels for people in the undertaking's own workforce to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for OECD Multinational Enterprises related to the matters defined in paragraph 2 of this Standard, excluding those already reported in (a) above.

S1-17-103 c) AR 103 and 106	*The undertaking shall disclose*: ***(c) the total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements.***

In 2025, the total amount of fines, sanctions and damages resulting from the above cases and grievances was EUR 0. However, there is a disciplinary record of six days without pay for one of the individuals named in one of the sexual harassment complaints.

S1-17-103 d) AR 103 and 106	*The undertaking shall disclose*: ***(d) where applicable, contextual information necessary to understand the data and how such data has been compiled.***

As part of its firm commitment to ethical conduct, and as an essential element of its work to eradicate discrimination and harassment, CIE Automotive has implemented and maintain a comprehensive set of ethics tools. This includes an Internal Whistleblowing System that is in full compliance with EU legislation, the relevant national laws, and the highest standards existing on the subject. This includes, among other elements, an internal reporting channel known as the Whistleblowing Channel, which is made available through the corresponding online platform. There is also a set of Whistleblowing Channel Rules that have been implemented and duly distributed. These tools play a fundamental role in promoting an organisational culture based on ethics, integrity, and transparency.

The Whistleblowing Channel, which is available via an online platform accessible through the corporate website, has been designed to serve as a means of communicating information about potential legal infringements (including infringements of EU law, criminal offences, administrative infractions, occupational health and safety violations, and possible non-compliances with the Professional Code of Conduct and all the other internal rules that are part of its Compliance Management System). The Whistleblowing Channel offers various ways of communicating the information being reported, and whistleblowers may select any of those options.

In 2023, CIE Automotive strengthened its Whistleblowing Channel by installing a digital platform on its corporate website, which ensures the security of the whistleblowing process and simplifies how the Company manages each case. It is a cutting-edge and intuitive system in all the languages of the countries where the company is present, which offers the possibility of opening a secure mailbox where users can submit reports and provide complementary information in various formats (in writing, voice messages, etc.). All the information is confidential and, if the whistleblower wishes, anonymous.

The new digital channel has been implemented in accordance with the requirements of the Whistleblower Protection Act and in line with international legal requirements, which derive from Directive (EU) 2019/1937 of the European Parliament and of the Council.

Compliance with this new law has led to the modification of the Whistleblowing Channel Rules, which set out the general principles of the system and how it is managed.

The Whistleblowing Channel includes all available avenues for people to report incidents of discrimination, including harassment, with information legitimately obtained in the context of an employment or professional relationship, in relation to issues relating to gender equality and non-discrimination policies, as well as those that may constitute harassment according to the definitions contained in this document.

All members, understood as all people who comprise the company, whether they are employees —whatever their status, including trainees—, shareholders, executives, or members of the Board of Directors, as well as applicants in hiring processes, trainees, retirees, etc., may submit information on alleged harassment.

External third parties such as suppliers, contractors and subcontractors may also use the Whistleblowing Channel, they may report the breaches referred to above through the Whistleblowing Channel in full compliance with its requirements and procedures.

All employees have a responsibility to build a working environment in which harassing behaviour is unacceptable and undesirable and are therefore obliged to report any actions that they may become aware of that could constitute harassment.

S1-17-104 a) AR 103 and 106	*The undertaking shall disclose the following information regarding identified cases of severe human rights incidents (e.g., forced labour, human trafficking or child labour):* ***(a) the number of severe human rights incidents connected to the undertaking's workforce in the reporting period, including an indication of how many of these are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises, If no such incidents have occurred, the undertaking shall state this.***

Defence of Human Rights

CIE Automotive upholds the inherent rights of all people, which are universally recognised and enshrined in the United Nations Global Compact, which it became a signatory of in 2015.

This commitment to human rights is embodied in its Human Rights Policy, which formalises its commitment to respecting human rights in all its activities and applies not only to its employees, but also to its customers, suppliers and the communities surrounding its facilities, including indigenous peoples.

In this way, it rejects child or forced labour and discrimination in employment and occupation, and promotes respect for freedom of association and the right to collective bargaining, and it complies with the legislation of the countries where it operates, in accordance with internationally recognised rights and its own Human Rights Policy.

The Human Rights Policy complies with the International Labour Organisation's core conventions related to respect for freedom of association and the right to collective bargaining, as well as with measures on prevention of child labour and compliance with the minimum work age.

In 2025, as in 2024, there were zero serious human rights incidents related to the company's workforce.

S1-17-104 b) AR 103 and 106	*The undertaking shall disclose the following information regarding identified cases of severe human rights incidents (e.g., forced labour, human trafficking or child labour):* ***(b) the total amount of fines, penalties and compensation for damages for the incidents described in (a) above, and a reconciliation of the monetary amounts disclosed in the most relevant amount in the financial statements.***

In 2025, as in 2024, there were no payments for fines, sanctions or damages for the incidents described in the response to *S1-17-104 a).*

3.2 ESRS 2: Workers in the value chain

3.2.1 Strategy

3.2.1.1 DR related to ESRS 2 SBM-2 – Interests and views of stakeholders

S2 – SBM – 2- 9	*When responding to ESRS 2 SBM-2 paragraph 43, the undertaking shall disclose how the interests, views, and rights of its value chain workers could be materially impacted by the undertaking, including respect for their human rights, inform its strategy and business model. Value chain workers are a key group of affected stakeholders.*

According to the 2025 ESG Strategic Plan, the Supply Chain is considered (Materiality Matrix) to be of high importance with respect to management. Accordingly, CIE Automotive has defined a number of ESG indicators related to its supply chain, three of which are public and are included in the 2025 ESG Strategic Plan available on the corporate website.

Value chain workers are a key group of CIE Automotive's affected stakeholders. This is why the Company focuses on this affected group and attaches increasing importance to it in its internal and external policies, procedures and requirements.

CIE Automotive's supply chain management strategy is based on a Local Management of Local Application (GLOCAL) model, in which local purchasing is promoted in each of the locations in which it operates, always following the global guidelines and procedures established by the Corporation. This decentralisation is particularly efficient because it reduces logistics and customs costs, lowers exchange rate risk, and facilitates flows by overcoming cultural and linguistic differences and time zones. At the same time, it promotes sustainable procurement by reducing CO2 emissions from transport.

Some of the documents and procedures that ensure the safety of workers in the value chain in particular, and human rights in general, are:

General Purchasing Conditions:

Mandatory and signed together with every order/purchase of all the Group's plants. They have various environmental and human rights clauses that promote the well-being of workers in the value chain. This document includes three points that reinforce CIE Automotive's commitment to workers' human rights:

- Requiring the supplier to have a system for detecting risks and/or breaches of human rights. This procedure is intended not only to identify irregularities at an early stage, but also to identify irregularities in a partner's employees, thus covering as large a part of the supply chain as possible.
- CIE Automotive has the unilateral right to carry out a physical audit at the employee's premises if it suspects or has identified a risk of a human rights violation and/or a violation of environmental legislation. It gives it the right to act swiftly and verify any irregularities without relying on the third party.
- The Group's right to terminate the business relationship without compensation if it identifies any unrectified human rights or environmental violation. It allows us to distance ourselves from any suspicions or associates who are not acting according to our standards.

Global Supply Chain Manual:

This manual is a faithful reflection of the supply chain's systems and procedures. It provides a simple visual description of the Mission and Procurement Policy, the types of product and service purchases, the procurement flowchart and the internal procedures associated with it, and the ESG requirements that suppliers must comply with to work with CIE Automotive.

Supplier ESG commitment (Supplier Code of Conduct):

A document containing environmental, social and governance (ESG) clauses, acceptance of which is a prerequisite for working with CIE Automotive, regardless of the country where the supplier is located. Specific points on conditions for workers in the Group's value chain, in which CIE Automotive's partners agree to care for their workers in areas such as: fair pay and social benefits, freedom of association, non-discrimination of any kind, decent working hours, zero forced labour, child labour or any kind of modern slavery, health and safety in accordance with legislation, and respect for the environment. Many of the requirements in this Commitment are aligned with the clauses of the International Labour Organisation (ILO), the United Nations specialised agency dealing with labour and industrial relations issues.

ISO 20400 Certification in Sustainable Procurement:

The ISO 20400 certification reinforces the Group's sustainability policies by extending them to its entire supply chain and lays the foundation for further progress in ESG:

- Ensuring supply chain safety.
- Avoiding human and labour rights, financial, environmental, and reputational risks.
- Instilling confidence in investors, customers and other stakeholders.
- Promoting employee welfare and helping open new markets for products and services.
- Being prepared to achieve decarbonisation targets.

Supplier ESG Portal:

A tool exclusively dedicated to managing the Environmental, Social and Governance aspects of the supply chain. Obligation to register and pass the ESG assessment for productive or direct suppliers, as well as non-productive or indirect suppliers with a purchase volume of over EUR 0,5 million/year.

External audit and ESG alerts, Moody's Analytics:

Assessment by one of the world's leading ESG rating and rating companies to verify the ESG compliance of over 90% of the global procurement volume, and to identify potential violations of environmental, social, human rights, etc., criteria, Covering topics such as:

- RED FLAGS: understood as limits not to be exceeded in the following areas: sanctions, human rights, environment, business behaviour, corporate governance, etc., among others.
- ESG alerts.
- Sanctions (local and international).
- Risk of default or insolvency.
- News on breaches of the law.
- Anti-bribery and corruption alerts.

Quarterly ESG indicators:

To underscore CIE Automotive's commitment and dedication to human rights and the environment, each quarter it monitors the ESG indicators set out in the 2020-25 ESG Strategic Plan, which includes ESG requirements in the supply chain.

Sustainable Procurement Policy:

This policy, which is mandatory for all Group employees, was created in 2024 and complements all the procedures mentioned above. It focuses on environmental and human rights requirements for the entire value chain, and has specific points of relevance such as:

- Workers in the Value Chain: The key point of this policy focuses on the rights of workers in the value chain. Upholding good human rights practices in the supply chain, and promoting the conditions, welfare and rights of all workers in the CIE Automotive Group's value chain.
- Rectifying non-compliance: processes and means for reporting any non-compliance, as well as the steps to be followed for identifying and reporting them, as well as processes for curing them, and the consequences of not correcting them.
- Whistleblowing channels: instructions on where and how any worker in the value chain can report or raise a suspicion of any type of human rights or environmental violation.

Conflict minerals policy:

The Minerals Policy was approved in 2021 to reinforce the requirement in this area, although the Global Supply Chain Manual and the General Purchasing Conditions already prohibited their use and required this through the "Conflict Minerals" questionnaire on the Supplier Portal. All suppliers must warrant that they do not use "Conflict Minerals", or ensure that their minerals do not originate from conflict zones, if they work with any of them. This policy is aimed at combating child and forced labour in areas designated as "conflict zones".

Supply Chain Race2Zero:

A project focused on measuring CIE Automotive's carbon footprint by getting its suppliers engaged in its commitment to achieve climate neutrality by 2050.

Supplier audits including ESG criteria:

CIE Automotive seeks to anticipate potential risks in its supply chain by implementing transparent procedures and regular audits of its suppliers. In these processes, ESG aspects are becoming increasingly important.

3.2.1.2 DR related to ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

ESRS 2 – SBM - 3 - 10	*When fulfilling the requirements of paragraph the undertaking shall disclose: (a) whether and how actual and potential occurrences on its own personnel, as determined in accordance with ESIS 2 IRO-1, Description of the processes for identifying and assessing material impacts, risks and opportunities: (i) arise from or relate to the company's strategy and business models, and (ii) inform and contribute to the alignment of the company's strategy and business model; and (b) the relationship between, on the one hand, its material risks and opportunities arising from impacts on, and dependencies on, employees in the value chain and, on the other hand, its strategy and business mode.,*

The overall process followed for the identification and assessment of impacts, risks and opportunities related to workers in the value chain, and of the units in relation to them, are described in *ESRS 2 IRO-1 Description of processes for identifying and assessing material impacts, risks and opportunities*, and within the response to ESRS indicator *2-SBM-3-48 h)*.

S2 – SBM – 3 - 11	*When fulfilling the requirements of paragraph ESRS 2 SBM-3 paragraph 48, the undertaking shall disclose whether all value chain workers who are likely to be materially impacted by the undertaking, including impacts that are connected with the undertaking's own operations and value chain, including through its products or services, as well as through its business relationships, are included in the scope of its disclosure under ESRS 2.*

As CIE Automotive has not identified any material impacts on the employees upstream or downstream in its value chain in its dual materiality analysis of its value chain, the Group defines procedures to ensure that this stakeholder group is considered in a general sense (without distinguishing, for example, whether they are subcontractors or direct employees of the company or of a supplier), rather than identifying specific factors that may place the employees at greater risk than others.

Therefore, the scope of the requirements of ESRS 2 SBM-3 includes all workers in the value chain who could be affected by the Company.

S2 – SBM – 3 – 11 a)	*In addition, the undertaking shall provide the following information: (a) a brief description of the types of value chain workers who could be materially impacted by the undertaking, including impacts that connected with the undertaking's own operations and value chain, including through its products or services, as well as through its business relationships, and specify whether they are:* *i. workers working on the undertaking site but who are not part of own workforce, i.e., who are not self-employed workers or workers provided by third party undertakings primarily engaged in employment activities (covered through ESRS S1);* *ii. workers working for entities in the undertaking's upstream value chain (e.g., those involved in the extraction of metals or minerals or harvesting of commodities, in refining, manufacturing or other forms of processing);* *iii. workers working for entities in the undertaking's downstream value chain (e.g., those involved in the activities of logistics or distribution providers, franchisees, retailers);* *iv. workers working in the operations of a joint venture or special purpose vehicle involving the reporting undertaking;* *v. workers who (within the prior categories or additionally) are particularly vulnerable to negative impacts whether due to their inherent characteristics or to the particular context, such as trade unionists, migrant workers, home workers, women or young workers.*

CIE Automotive's IRO analysis has not identified specific groups of workers at higher risk in its value chain. The policies and procedures described in this report apply equally to all suppliers, irrespective of their purchasing family, and regardless of whether the suppliers' workers are subcontracted or employed by it directly.

The company places special emphasis on ensuring that no other minority group is harmed, whether in terms of approval, hiring or contractual terms, with mandatory policies and procedures such as the Supplier Code of Conduct (referred to as the Supplier ESG Commitment in this document), the Supplier Portal, the Sustainable Procurement Policy, etc., among other corporate documents, where special relevance is given to workers who are particularly vulnerable to negative impacts due to their inherent characteristics or their particular context, such as underage workers, employees working under duress, women, workers of any race or sexual condition, etc. All these documents are identified in this report.

S2 – SBM – 3 – 11 b)	*In addition, the undertaking shall provide the following information: (b) any geographies, at country level or other levels, or commodities for which there is a significant risk of child labour, or of forced labour or compulsory labour, among workers in the undertaking's value chain.*

A double materiality analysis was carried out to identify potential ESG disruptions by identifying greater vulnerabilities by region or by purchasing families. Both of these are detailed below:

- **Geopolitical Matrix + CatNat** (Extreme event of natural or man-made origin that may cause damage to our physical or human assets)**:** The analysis of the location of the Group's production plants worldwide and the employees that supply them, and based on statistics and data from specialised third parties, showed that there is no region with a significant risk of non-compliance. All the regions scored under 2, which places them outside the danger zone of the risk matrix heat map.
- **Matrix of ESG compliance by procurement family:** to be able to carry out an analysis of risk differentiated by impact on various types of purchases, this Matrix shows that the core businesses have been working longer on compliance and investing more in ESG matters. At the same time, the non-core businesses are the ones that evolve the most year after year. No specific businesses have been identified as being less compliant or at risk.

S2 – SBM – 3 – 11 c)	*In addition, the undertaking shall provide the following information: (c) in the case of material negative impacts, whether they are either (i) widespread or systemic in contexts where the undertaking operates or has sourcing or other business relationships (e.g., child labour or forced labour in particular commodity supply chains in specific countries or regions), or (ii) related to individual incidents (e.g., an industrial accident or an oil spill) or to specific business relationships, This includes consideration of impacts on value chain workers that may arise from the transition to greener and climate-neutral operations, Potential impacts include impacts associated with innovation and restructuring, closure of mines, increased mining of minerals needed for the transition to a sustainable economy, and solar panel production.*

According to the response included under *S2-SBM-3-11 b)*, no significant risks have been identified and the indicator does not apply. However, the Conflict Minerals Policy, referred to under *S2–SBM-2– 9*, reinforces any potential non-compliance in this regard.

S2 – SBM – 3 – 11 d)	*In addition, the undertaking shall provide the following information: (d) in the case of material positive impacts, a brief description of the activities that result in the positive impacts (e.g., updated purchasing practices, capacity-building to supply chain workers), including providing opportunities for the workforce such as job creation and upskilling in the context of a 'just transition', and the types of value chain workers that are positively affected or could be positively affected; the undertaking may also disclose whether the positive impacts occur in specific countries or regions.*

By applying local purchasing management (92% of the number of our suppliers in the world are local, representing 77% of the total purchase volume in 2025) and thus favouring the local and nearby market where we operate and improving the conditions of the workers in our value chain, especially in countries with lower development indexes, opportunities were identified in the dual materiality analysis:

- Local economies are strengthened.
- The conditions of value chain workers are improved.
- Irregularities are mitigated and minority groups are empowered.
- Job stability for workers in the value chain due to solid contracts that guarantee a long-term business relationship (potential).
- Fair pay, so workers in the Value Chain can live in dignity due to the labour terms set out in the contracts signed by the company (potential).
- Establishment of social dialogue procedures that encourage the participation of workers in the Value Chain due to the terms established in the contracts signed by the company (potential).
- Reduction in the accident rate in the Value Chain thanks to the efficiency of the monitoring and controls carried out on suppliers within the framework of contracts with the company (potential).
- Increased diversity and inclusion of employees in the Value Chain due to the company's influence to improve ESG policies (potential).
- CIE Automotive is a leader in the Global Compact training programme on sustainability criteria for small and medium-sized enterprises (SMEs).

S2 – SBM – 3 – 11 e)	*In addition, the undertaking shall provide the following information: (e) any material risks and opportunities for the undertaking arising from impacts and dependencies on value chain workers.*

Impacts, Risks and Opportunities (IROs)

+: positive impact // -: negative impact // R: risk // O: opportunity

Subtopics	Sub-subtopics	IROs
Other work-related rights	Forced labour	(R) Financial impacts arising from: Lack of protection of vulnerable workers.
	Child labour	(R) Financial impacts arising from: Lack of protection for children due to cases of child labour in suppliers' plants.
	Freedom of association	(R) Financial impacts arising from: Infringement of the right to freedom of association of workers in the Value Chain due to the company's lack of control of ethical commitments,
	Health and safety	(O) Financial impacts arising from: Reduction in the accident rate in the Value Chain thanks to the efficiency of the monitoring and controls carried out on suppliers within the framework of contracts with the company.
	Diversity	(O) Financial impacts arising from: Increased diversity and inclusion of employees in the Value Chain due to the company's influence to improve ESG policies.
	Measures against violence and harassment in the workplace	(R) Financial impacts arising from: Cases of violence or harassment due to discrimination (racial, gender or sexual) on the premises of the companies in the Value Chain.

Each risk and opportunity identified above as material has been included in the compliance policies and the approval and business relationship monitoring procedures for the supply chain.

Failure to comply with any of them entails termination of the commercial relationship with the supplier under the General Purchasing Conditions, which grant CIE Automotive the right to terminate the contractual relationship for failure to cure any ESG breach, with no liquidated damages due by the Group, as reflected under*S2-SBM-2-9.*

In addition, the identified impacts are monitored on a quarterly basis through the group's internal platform.

S2 – SBM – 3 – 12 AR 8	*In describing the main types of value chain workers who are or could be negatively affected, based on the materiality assessment set out in ESRS 2 IRO-1, the undertaking shall disclose whether and how it has developed an understanding of how workers with particular characteristics, those working in particular contexts, or those undertaking particular activities may be at greater risk of harm.*

As described under *S2-SBM-3-11*, the dual materiality analysis conducted led CIE Automotive to perform a general analysis of the workers in its value chain, and no specific groups were identified as being at high risk, since the internal policies, procedures and requirements apply equally to the entire supply chain, with no exceptions in terms of region, type of purchase, etc.

Historically, CIE Automotive has been increasing its strictness and compliance with the law and improving how the most vulnerable groups are treated, for example through its policies and procedures that encourage diversity, inclusion, non-violation of human rights in any form, racial, sexual, political, etc.

The depth and granularity of this year's analysis has not allowed us to ascertain how workers with particular characteristics, those working in particular contexts or those engaged in particular activities may be at greater risk of harm at this level of detail.

Implementing best practices and attaining a clearer understanding of the standards should allow this level of detail to be achieved in the years to come.

S2 – SBM – 3 – 13 AR 9	*The undertaking shall disclose which, if any, of its material risks and opportunities arising from impacts and dependencies on its value chain workers relate to specific groups of value chain workers (for example, particular age groups, workers in a particular factory or country) rather than to all of the value chain workers,*

As described under *S2-SBM-3-11*, the dual materiality analysis conducted led CIE Automotive to perform a general analysis of the workers in its value chain, and no specific groups were identified as being at high risk, since the internal policies, procedures and requirements apply equally to the entire supply chain, with no exceptions in terms of region, type of purchase, etc.

Historically, CIE Automotive has been increasing its strictness and compliance with the law and improving how the most vulnerable groups are treated, for example through its policies and procedures that encourage diversity, inclusion, non-violation of human rights in any form, racial, sexual, political, etc.

The depth and granularity of this year's analysis did not allow for a disaggregation of risks and opportunities by specific groups in the value chain.

Implementing best practices and attaining a clearer understanding of the standards should allow this level of detail to be achieved in the years to come.

3.2.2 Management of impacts, risks and opportunities

3.2.2.1 ESRS S2-1 – Policies related to value chain workers

S2 – 1 -16 *AR 10 and 13*	*The disclosure required by paragraph 14 shall contain the information on the undertaking's policies to manage its material impacts, risks and opportunities related to value chain workers in accordance with ESRS 2 MDR-P Policies adopted to manage material sustainability matters. In addition, the undertaking shall specify whether such policies cover specific groups of value chain workers or all value chain workers.*

Title	**Sustainable Procurement Policy**
Description	Sustainable Procurement Policy.
Objective	The purpose of this policy is to integrate sustainable practices and human rights throughout the value chain. Doing this will contribute to achieving the United Nations Sustainable Development Goals (SDGs) and ensure transparency in the reporting on the Group's performance with regard to the environment, sustainability and human rights. The commitments in this policy are articulated as a key tool to achieve the Group's objective of being a proactive company and defender of the human rights of the workers in its value chain (VC), the environment, and sustainable purchasing in all the regions where it operates. This policy, which is mandatory for all CIE Automotive associates, contains an exclusive section on "Workers in the Value Chain", which upholds the best practices of the companies in the value chain with regard to their employees. It has a whistleblowing and communication channel for any worker in the value chain to anonymously report or denounce any non-compliance. Another relevant element is the section on "Remediation" where steps and consequences are indicated in the event of a non-compliance and a failure to remediate it.
Material Impacts, Risks and Opportunities	As part of the continuous reviews of the Strategic Plan, the dependencies, impacts, risks and opportunities are assessed to ensure that the risks are mitigated and the opportunities are taken advantage of. Within the risks of workers in the value chain, an attempt was made to identify the impacts of the various possible types of workers, as well as their impact on the various purchasing families. This analysis of IROs provides reasonable assurance that all material value chain worker risks are prevented, identified, assessed and monitored on an ongoing basis. This policy has been created for that purpose: i.e., to prevent any breach of human rights for all employees of the value chain, regardless of their origin and nature. These requirements also do not differentiate between workers based on the type or purchasing family that applies to them. It is considered a positive impact as well as an opportunity to be proactive on these human rights criteria in the value chain, and to have these policies and procedures that strengthen the entire supply chain and minimise its risks. This policy addresses all the material IROs identified in the dual materiality analysis; - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Scope of the policy	The scope of this policy covers all of CIE Automotive's subsidiaries and affiliates where the company exercises financial and operational control. Applies to all workers in the Value Chain. There are no geographical or technological exclusions. In addition, this policy aims to monitor the supply chain to ensure that its commitments are aligned with those of the Company.
Stakeholders concerned	Value Chain Workers, Shareholders, Funders, Professionals, Customers, Business Partners, Suppliers, Society, Public Administrations and the Sector.
Geographical regions	The policy covers all regions where CIE Automotive is present.
Value Chain	The policy includes a commitment to promote and require commitments throughout the value chain regarding sustainability and human rights that are in line with those of the Company.
Body responsible for implementation	The Environment, Social and Governance (ESG) Committee will oversee the implementation of this policy and ensure it is aligned with the strategic and regulatory goals, with the support of the CEO,

	who in turn will be supported by Procurement and Supply Chain Management and the Horizontal ESG Committee.
Availability	The policy is available and publicly accessible on CIE Automotive's corporate website.

Title	**Supplier ESG commitment (Supplier Code of Conduct)**
Description	ESG Commitment and Code of Conduct to be signed and accepted by all suppliers.
Objective	The purpose of this document is to integrate sustainable practices and human rights throughout the value chain by implementing an initial filter in which suppliers must first be approved to be able to work with CIE Automotive. By including various clauses that protect the interests of the workers and employees in the supply chain and that impose environmental and social criteria we contribute to the fulfilment of the UN's Sustainable Development Goals (SDGs) and guarantee transparency in the disclosure of our environmental, sustainability and human rights performance. 100% of suppliers have signed or tacitly accept the Supplier Code of Conduct through the General Purchasing Conditions. This information is verified by an accredited external auditor (AERCE).
Material Impacts, Risks and Opportunities	This document is mandatory for any company that intends to work with the Group, and is aligned with the clauses of the International Labour Organisation (ILO), the United Nations specialised agency dealing with labour and industrial relations issues. This policy addresses all the material IROs identified in the dual materiality analysis; - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Scope	All CIE Automotive subsidiaries and affiliates where the company exercises financial and operational control, Applies to all workers in the Value Chain. There are no geographical or technological exclusions. It also aims to monitor the supply chain to ensure that its commitments are aligned with those of the Company. 100% of suppliers have signed or tacitly accept the Supplier Code of Conduct through the General Purchasing Conditions. This information is verified by an accredited external auditor (AERCE).
Stakeholders concerned	Value Chain Workers, Shareholders, Funders, Professionals, Customers, Business Partners, Suppliers, Society, Public Administrations and the Sector.
Geographical regions	The policy covers all regions where CIE Automotive is present.
Value Chain	The policy includes a commitment to promote and require commitments throughout the value chain regarding sustainability and human rights that are in line with those of the Company.
Body responsible for implementation	The Environment, Social and Governance (ESG) Committee will oversee the implementation of this policy and ensure it is aligned with the strategic and regulatory goals, with the support of the CEO, who in turn will be supported by Procurement and Supply Chain Management and the Horizontal ESG Committee.
Availability	The policy is available and publicly accessible on CIE Automotive's corporate website.

Title	**General Purchasing Conditions**
Description	General Purchasing Conditions accepted by all suppliers and included in each order/purchase.
Objective	Mandatory and signed together with every order/purchase of all the Group's plants. They have various environmental and human rights clauses that promote the well-being of workers in the value chain. A new feature this year is the inclusion of three points that reinforce CIE Automotive's commitment to workers' human rights: - Requiring the supplier to have a system for detecting risks and/or breaches of human rights. This procedure is intended not only to identify irregularities at an early stage, but also to identify irregularities in a partner's employees, thus covering as large a part of the supply chain as possible. - CIE Automotive has the unilateral right to carry out a physical audit at the employee's premises if it suspects or has identified a risk of a human rights violation and/or a violation of environmental legislation. It gives it the right to act swiftly and verify any irregularities without relying on the third party. - The Group's right to terminate the business relationship without compensation if it identifies any unrectified human rights or environmental violation. It allows us to distance ourselves from any suspicions or associates who are not acting according to our standards.
Material Impacts, Risks and Opportunities	The same applies as for the Sustainable Procurement Policy (see table above). The IRO analysis matrix identified the risk of non-compliance with any of the clauses as a risk, but concluded that the procedures and their disclosure are sound, and if a risk is identified, it is guaranteed to be remediated or the associate is replaced (see the three detailed points in the "Target" box above). This document addresses all the material IROs identified in the dual materiality analysis; - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Scope	All CIE Automotive subsidiaries and affiliates where the company exercises financial and operational control. Applies to all workers in the Value Chain. There are no geographical or technological exclusions. It also aims to monitor the supply chain to ensure that its commitments are aligned with those of the Company.
Stakeholders concerned	Value Chain Workers, Shareholders, Funders, Professionals, Customers, Business Partners, Suppliers, Society, Public Administrations and the Sector.
Geographical regions	The policy covers all regions where CIE Automotive is present.
Value Chain	The policy includes a commitment to promote and require commitments throughout the value chain regarding sustainability and human rights that are in line with those of the Company.
Body responsible for implementation	The Environment, Social and Governance (ESG) Committee will oversee the implementation of this policy and ensure it is aligned with the strategic and regulatory goals, with the support of the CEO, who in turn will be supported by Procurement and Supply Chain Management and the Horizontal ESG Committee.
Availability	The policy is available and publicly accessible on CIE Automotive's corporate website.

Title	**Global Supply Chain Manual**
Description	Document summarising the actions, requirements, procedures and methods for managing the Group's supply chain.
Objective	This manual is a faithful reflection of the supply chain's systems and procedures. It provides a simple visual description of the Mission and Procurement Policy, the types of product and service purchases, the procurement flowchart and the internal procedures associated with it, and the ESG requirements that suppliers must comply with to work with CIE Automotive, and the minimum requirements for the workers in its value chain.
Material Impacts, Risks and Opportunities	The same applies as for the Sustainable Procurement Policy (see table above). The IRO analysis matrix identified the risk of non-compliance with any of the clauses as a risk, but concluded that the procedures and their disclosure are sound, and if a risk is identified, it is guaranteed to be remediated or the associate is replaced (see the three detailed points in the "Target" box above). This manual addresses all the material IROs identified in the dual materiality analysis; - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Scope	All CIE Automotive subsidiaries and affiliates where the company exercises financial and operational control. Applies to all workers in the Value Chain. There are no geographical or technological exclusions. It also aims to monitor the supply chain to ensure that its commitments are aligned with those of the Company.
Stakeholders concerned	Value Chain Workers, Shareholders, Funders, Professionals, Customers, Business Partners, Suppliers, Society, Public Administrations and the Sector.
Geographical regions	The policy covers all regions where CIE Automotive is present.
Value Chain	The policy includes a commitment to promote and require commitments throughout the value chain regarding sustainability and human rights that are in line with those of the Company.
Body responsible for implementation	The Environment, Social and Governance (ESG) Committee will oversee the implementation of this policy and ensure it is aligned with the strategic and regulatory goals, with the support of the CEO, who in turn will be supported by Procurement and Supply Chain Management and the Horizontal ESG Committee.
Availability	The policy is available and publicly accessible on CIE Automotive's corporate website.

Title	**ISO 20400 - Sustainable Procurement**
Description	Certification in Sustainable Purchasing and Procurement.
Objective	The ISO 20400 certification reinforces the Group's sustainability policies by extending them to its entire supply chain and lays the foundation for further progress in ESG: - Ensuring supply chain safety. - Avoiding human and labour rights, financial, environmental, and reputational risks. - Instilling confidence in investors, customers and other stakeholders. - Promoting employee welfare and helping open new markets for products and services. - Being prepared to achieve the decarbonisation targets set in the Strategic Plan.
Material Impacts, Risks and Opportunities	In the IRO analysis matrix, this is identified as an opportunity given the official nature of the certification (issued by a recognised external party), and the updated requirements over time, as it is a standard that requires annual renewal with the corresponding audit. It is considered an opportunity because these renewals are based on new requirements and legislation, are regularly verified by a specialised and are recognised third party. It is an opportunity because of the official nature of the certification and because the market or sector sees it as a distinction that sets the Company apart. In Spain, CIE Automotive is currently the only company in the automotive sector to be certified in the ISO 20400 Sustainable Procurement standard.
Scope	All CIE Automotive subsidiaries and affiliates where the company exercises financial and operational control, Applies to all workers in the Value Chain. There are no geographical or technological exclusions. It also aims to monitor the supply chain to ensure that its commitments are aligned with those of the Company.
Stakeholders concerned	Value Chain Workers, Shareholders, Funders, Professionals, Customers, Business Partners, Suppliers, Society, Public Administrations and the Sector.
Geographical regions	The policy covers all regions where CIE Automotive is present.
Value Chain	The policy includes a commitment to promote and require commitments throughout the value chain regarding sustainability and human rights that are in line with those of the Company.
Body responsible for implementation	The Environment, Social and Governance (ESG) Committee will oversee the implementation of this policy and ensure it is aligned with the strategic and regulatory goals, with the support of the CEO, who in turn will be supported by Procurement and Supply Chain Management and the Horizontal ESG Committee.
Availability	The policy is available and publicly accessible on CIE Automotive's corporate website.

S2-1-17	*The undertaking shall describe its human rights policy commitments that are relevant to value chain workers, including those processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises.*

Human Rights Policy:

CIE Automotive's Human Rights Policy formalises its commitment in this area, in a manner consistent with its Code of Conduct and the ten principles of the United Nations Global Compact.

CIE Automotive bases its definition on the International Bill of Human Rights and also:

- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- The United Nations Guiding Principles on Business and Human Rights.
- The OECD Due Diligence Guidance.
- The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- The United Nations Sustainable Development Goals (SDGs). Respect for human rights is one of CIE Automotive's fundamental commitments, as well as an aspect inseparably linked to the United Nations 2030 Agenda for Sustainable Development.

CIE Automotive believes that all enterprises and organisations, including those from the public sector and those from the private sector, must make a commitment to respecting human rights, and it is therefore committed to respecting those rights during all of its activities. It applies that commitment not only to the Group's employees, but also to its value chain workers, customers and suppliers, and to the communities where its facilities are located, including indigenous peoples.

The Clauses of the ESG Commitment for Suppliers (or Supplier Code of Conduct), described in the previous section, defines the requirements that all suppliers must meet with their employees to form part of CIE Automotive's supply chain. These clauses are aligned with, and identified in the document itself with, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

The Group's Sustainable Procurement Policy defines the Group's objectives, with an exclusive point referring to "Workers in the Value Chain", as well as the requirements to be met and the procedures in the event of non-compliance.

The commitments under these policies and procedures are to always defend all the workers in the value chain, to minimise the impact that could be posed to them in any region, to continuously adapt to new and changing legislation, and to be proactive and train any SMEs that want to work with the Group and would need adapt their procedures.

S2-1-17 a)	*In its disclosure, it shall focus on those matters that are material in relation to, as well as the general approach to:* ***(a) respect for the human rights, including labour rights, of workers****;*

Human Rights Policy:

CIE Automotive's Human Rights Policy formalises its commitment in this area, in a manner consistent with its Code of Conduct and the ten principles of the United Nations Global Compact.

CIE Automotive bases its definition on the International Bill of Human Rights and also:

- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- The United Nations Guiding Principles on Business and Human Rights.
- The OECD Due Diligence Guidance.
- The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- The United Nations Sustainable Development Goals (SDGs). Respect for human rights is one of CIE Automotive's fundamental commitments, as well as an aspect inseparably linked to the United Nations 2030 Agenda for Sustainable Development.

CIE Automotive believes that all enterprises and organisations, including those from the public sector and those from the private sector, must make a commitment to respecting human rights, and it is therefore committed to respecting those rights during all of its activities. It applies that commitment not only to the Group's employees, but also to its value chain workers, customers and suppliers, and to the communities where its facilities are located, including indigenous peoples.

The information contained in this policy is also contained in the Global Supply Chain Manual, which sets out the minimum required standards that suppliers and their subcontracting partners must respect and comply with.

These requirements are based on CIE Automotive's commitments to the following international standards:

- The OECD's Guidelines for Multinational Companies.
- The UN's Sustainable Development Goals.
- The International Labour Organisation (ILO).
- The Ten Principles of the United Nations Global Compact.

All products and services delivered by our suppliers and their subcontracted partners must comply with the occupational health and safety standards required by applicable law, including training, information and emergency measures at the workplace, such as the availability of protective and safety equipment and medical examinations to ensure adequate physical and physiological fitness.

The Supplier Code of Conduct or ESG Commitment for Suppliers defines, through its clauses, the points that all suppliers must meet with their employees to form part of CIE Automotive's supply chain.

These clauses are aligned with, and identified in the document itself with, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. This document explicitly mentions, in various clauses, the working conditions of the workers in the value chain and need for any Group associate to comply with them.

The Group's Sustainable Procurement Policy defines the Group's objectives, with an exclusive point referring to "Workers in the Value Chain", as well as the requirements to be met and the procedures in the event of non-compliance. This sub-section of the policy requires suppliers to respect the human rights of workers, including labour rights.

An example of one of these points is shown below: "Decent working conditions: Ensure that suppliers and subcontractors guarantee decent working conditions for all workers in the value chain, including fair wages, reasonable working hours and a safe and dignified working environment.

S2-1-17 b)	*In its disclosure, it shall focus on those matters that are material in relation to, as well as the general approach to:* ***(b) engagement with value chain workers****,*

As set out in the Global Supply Chain Manual, CIE Automotive has a Supplier Environmental, Social and Governance (ESG) Portal, which is an online platform focused solely on ESG management, that is free of charge and accessible at the following web address: https://supplychain.cieautomotive.com/Home/Login, and technical support is also available at: Tel: +34 910 770 157 and email: ciesupplierportal@cieautomotive.com

This platform, which in turn is an interactive channel, is designed to fulfil two objectives:

1. To help companies interested in working with CIE Automotive register with it by standardising the assessment required for them to be included on the supplier list.
2. To provide a reference tool for purchasing managers worldwide.

Once they are registered on the Portal, suppliers must answer four questionnaires covering the following areas:

- Business management
- Environmental management
- ESG management
- Conflict mineral management

CIE Automotive ensures that its procurement processes are standardised, following the criteria of objectivity, impartiality and equal opportunity. Registration through the Supplier Portal, (verified and renewed every four years), becomes a necessary requirement for these production suppliers working with CIE Automotive, and will bring multiple benefits to their company:

- Inclusion on the CIE Automotive Group's global supplier list.
- Expedited submission of the minimum documentation required to become a supplier to CIE Automotive.
- An easy tool for managing updates to the company's data and users.

Signing the Supplier ESG Commitment is mandatory for both regular suppliers, as they are part of CIE Automotive's supplier list, and new suppliers.

The CIE Automotive Group demonstrates its commitment to the workers in its value chain with its procedures and requirements for all its associates in this area. Specifically, there is the recently created Sustainable Procurement Policy with a section dedicated exclusively to "Workers in the Value Chain".

Another commitment demonstrated by the Group in its commitment to the workers in its value chain is its willingness to continue to be certified in the ISO 20400 standard, whose annual audits for renewal require showing evidence to the external auditors of the Group's work and continuous compliance in this area.

S2-1-17 c)	*In its disclosure, it shall focus on those matters that are material in relation to, as well as the general approach to:* ***(c) measures to provide and/or enable remedy for human rights impacts****.*

Section 5 of the Sustainable Procurement Policy: *Remediation of non-compliance*, defines and details the procedures and steps for rectifying and remediating any negative impacts on workers. The steps defined there will redress and remedy any possible negative impacts on the workers' human rights.

Examples of these measures to provide and/or facilitate remedies for impacts on human rights include:

- Disclosing the non-compliance to the affected parties and analysing its impact. This may lead to the supplier being suspended, depending on whether the non-compliance is remedied.
- Corrective and preventive action plans, which should be drawn up in consultation with the affected groups where appropriate, establishing monitoring mechanisms to evaluate the application and effectiveness of the established prevention and mitigation measures.

- To ensure the effectiveness of these measures, the business and operational managers must allocate resources and responsibility for prevention and mitigation to appropriate levels and duties within the organisation.

In addition, the Group's General Purchasing Conditions contain three clauses on identifying and mitigating negative impacts on workers, and the Group may even terminate its business relationship with the supplier (unilaterally and without liquidated damages) if the non-compliance is not rectified, as detailed in the response to *S2-SBM-2-9*.

S2-1-18	*The undertaking shall state whether its policies in relation to value chain workers explicitly address trafficking in human beings, forced labour or compulsory labour and child labour. It shall also state whether the undertaking has a supplier code of conduct.*

Human Rights Policy:

CIE Automotive's Human Rights Policy formalises its commitment in this area, in a manner consistent with its Code of Conduct and the ten principles of the United Nations Global Compact.

CIE Automotive bases its definition on the International Bill of Human Rights and also:

- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- The United Nations Guiding Principles on Business and Human Rights.
- The OECD Due Diligence Guidance.
- The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- The United Nations Sustainable Development Goals (SDGs). Respect for human rights is one of CIE Automotive's fundamental commitments, as well as an aspect inseparably linked to the United Nations 2030 Agenda for Sustainable Development.

CIE Automotive believes that all enterprises and organisations, including those from the public sector and those from the private sector, must make a commitment to respecting human rights, and it is therefore committed to respecting those rights during all of its activities. It applies that commitment not only to the Group's employees, but also to its value chain workers, customers and suppliers, and to the communities where its facilities are located, including indigenous peoples.

In the ESG Commitment of the Supplier Code of Conduct, which suppliers are required to sign, the suppliers acknowledge that they have been informed of this, in terms of respect for human rights, and they agree to apply it in their company or group of companies, regardless of the country in which they operate. In turn, upon acceptance of this document, they agree to obtain the same commitment from their own suppliers as they have made to CIE Automotive.

The same document explicitly addresses issues such as human trafficking, forced or compulsory labour, and child labour, among others. In addition, these requirements are also explicitly mentioned in the General Purchasing Conditions as well as in the Sustainable Procurement Policy, as detailed throughout this report.

S2-1-19 *AR 14*	*The undertaking shall disclose whether and how its policies with regard to value chain workers are aligned with internationally recognised instruments relevant to value chain workers, including the United Nations (UN) Guiding Principles on Business and Human Rights. The undertaking shall also disclose the extent to which cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve value chain workers have been reported in its upstream and downstream value chain and, if applicable, an indication of the nature of such cases.*

CIE Automotive formalises its commitment to human rights through its Human Rights Policy, which is aligned with the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work; the United Nations Guiding Principles on Multinational Enterprises; the OECD's Due Diligence Guidance; the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy; and the Sustainable Development Goals (SDGs) adopted by the United Nations.

Respect for human rights is one of CIE Automotive's fundamental commitments, as well as an aspect inseparably linked to the United Nations 2030 Agenda for Sustainable Development.

The policy guarantees:

- Respect and prevention of discrimination on the basis of personal, political or socio-economic characteristics.
- Prohibition of child and forced labour, with measures to prevent and correct possible risks.
- Decent working conditions, the right to rest, and health and safety measures.
- Freedom of association and collective bargaining.

- Promotion of human rights throughout the value chain.

CIE Automotive assesses compliance with this policy through:

- Whistleblowing Channel: Available to employees and third parties, managed by the Compliance body, where possible violations can be reported in full confidentiality and without retaliation.
- Periodic audits and reviews: Supervised by the Corporate Social Responsibility Committee.
- Training and awareness-raising: Promoting respect for human rights, especially in high-risk regions

The policy is reviewed annually to keep it in line with international best practices. CIE Automotive believes that all enterprises and organisations, including those from the public sector and those from the private sector, must make a commitment to respecting human rights, and it is therefore committed to respecting those rights during all of its activities. It applies that commitment not only to the Group's employees, but also to its customers and suppliers, and to the communities where its facilities are located, including indigenous peoples.

The ESG requirements for CIE Automotive's supply chain are set out in the Supplier ESG Commitment, a document that includes mandatory compliance criteria on matters relating to worker safety, human trafficking and the use of forced or child labour, and whether these provisions are fully compliant with the applicable ILO standards.

In this regard, as in 2024, no complaints were received in 2025 related to violations of the UN Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises that have value chain workers in their upstream and downstream value chain.

3.2.2.2 DR S2-2 – Processes for engaging with value chain workers about impacts

S2-2-22 *AR 20*	*The undertaking shall disclose whether and how the perspectives of value chain workers inform its decisions or activities aimed at managing the actual and potential impacts on value chain workers.*

When managing actual and potential impacts on workers in the value chain, the Group mainly takes into account legislation and laws in force in the various regions in which it operates, as well as legislation and recommendations of official and internationally recognised bodies for value chain workers, including the United Nations (UN) Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

The depth and granularity of this year's analysis did not allow for a disaggregation of risks and opportunities by specific groups in the value chain. Implementing best practices and attaining a clearer understanding of the standards should allow this level of detail to be achieved in the years to come.

S2-2-22 a)	*This shall include, where relevant, an explanation of:* ***(a) whether engagement occurs with value chain workers or their legitimate representatives directly, or with credible proxies that have insight into their situation.***

As reflected in the Group's Sustainable Procurement Policy, various communication channels have been established with the workers in the value chain to receive both reports of possible irregularities and first-hand information from workers on their interests or demands.

In any case, the Group regularly updates its policies and procedures and aligns itself with international reference bodies or proxies, as described in response to *S2 -1-19.*

S2-2-22 b) *AR 18*	*This shall include, where relevant, an explanation of:* ***(b) the stage(s) at which engagement occurs, the type of engagement, and the frequency of the engagement*** *.*

As reflected in the Group's Sustainable Procurement Policy, various communication channels have been established with the workers in the value chain to receive both reports of possible irregularities and first-hand information from workers on their interests or demands.

In any case, the Group regularly updates its policies and procedures and aligns itself with international reference bodies or proxies, as described in response to *S2 -1-19*. These processes are carried out at least annually.

S2-2-22 c) *AR 17 and 18*	*This shall include, where relevant, an explanation of:* ***(c) the function and the most senior role within the undertaking that has operational responsibility for ensuring that this engagement happens, and that the results inform the undertaking's approach.***

Procurement Department of each region is responsible for engaging with its specific value chain to identify any irregularities or demands from workers in its independent value chain, following the regulatory requirements of its own country as well as corporate governance requirements.

S2-2-22 d) *AR 19*	*This shall include, where relevant, an explanation of:* ***(d) where applicable, Global Framework Agreements or for agreements that the undertaking has with global union federations related to respect of human rights of workers in the value chain, including their right to bargain collectively, and including an explanation of how the agreement enables the undertaking to gain insight into those workers' perspectives.***

The ESG requirements of the Global Framework Agreements or commercial agreements with suppliers will never be less than those established in the General Purchasing Conditions, with common minimum clauses in all regions, which include clauses and requirements related to the human rights of workers, including their right to collective bargaining (a point also present in the mandatory ESG Commitment for suppliers).

The Company has no current Global Framework Agreements with global union federations.

S2-2-22 e)	*This shall include, where relevant, an explanation of:* ***(e) where applicable, how the undertaking assesses the effectiveness of its engagement with workers in the value chain, including, where relevant, any agreements or outcomes that result.***

CIE Automotive measures the effectiveness of its commitments and engagement with workers in the value chain by conducting a study and quantifying the complaints or reports it receives from the workers through the various channels, whether anonymous or not, which are available to them and publicly disclosed on its corporate website and in its Sustainable Procurement Policy.

S2-2-23	*Where applicable, the undertaking shall disclose the steps it takes to gain insight into the perspectives of workers that may be particularly vulnerable to impacts and/or marginalised (for example, women workers, migrant workers, workers with disabilities).*

CIE Automotive provides all the workers in its value chain with various communications channels, anonymous or otherwise, so they can submit any information or proposals regarding human rights, the environment or any other concerns. These channels are publicly disclosed on its corporate website and in its Sustainable Procurement Policy.

The depth and granularity of this year's analysis did not allow for a disaggregation of risks and opportunities by specific groups in the value chain. Implementing best practices and attaining a clearer understanding of the standards should allow this level of detail to be achieved in the years to come.

3.2.2.3 DR S2-3 – Processes to remediate negative impacts and channels for value chain workforce to raise concerns

S2-3-27 a) *AR 21*	*The undertaking shall describe:* ***(a) its general approach to and processes for providing or contributing to remedy where it has caused or contributed to a material negative impact on value chain workers, including whether and how the undertaking assesses that the remedy provided is effective.***

CIE Automotive is guided by the content of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises focused on remediation and grievance mechanisms.

The Sustainable Procurement policy, detailed above, sets out the procedures and steps to be followed in the event of non-compliance, with an exclusive section in the policy on "Remediation of non-compliance". The General Purchasing Conditions stipulate measures to mitigate possible risks or to terminate relations with suppliers who may commit irregularities, as stated under *S2-SBM-2-9.*

Some of the measures included in the General Purchasing Conditions that are intended to mitigate these risks include:

- Suppliers are required to be proactive and have a specific system in place to identify human rights violations of all kinds, including for workers in their value chain.

- If either party identifies a risk of non-compliance, there is a clause in the General Purchasing Conditions that allows CIE Automotive to conduct an audit at the supplier's facilities at any time to verify and quantify the potential non-compliance and thus mitigate its impact.
- If the supplier fails to remedy the breach, under another clause, CIE Automotive has the right to terminate the commercial relationship with the non-compliant partner, without of any kind liquidated damages.

S2-3-27 b) *AR 22*	*The undertaking shall describe*: ***(b) any specific channels it has in place for value chain workers to raise their concerns or needs directly with the undertaking and have them addressed, including whether these are established by the undertaking itself and/or whether they are third-party mechanisms.***

CIE Automotive has mechanisms, protocols and tools in place to facilitate the reporting of infractions and irregularities at the Company or breaches of its Professional Code of Conduct. These mechanisms focus mainly on the Whistleblowing Channel.

In 2023, it strengthened its whistleblowing channel by installing a digital platform on its corporate website, which ensures the security of the whistleblowing process and simplifies how the Company manages each case.

It is a cutting-edge and intuitive system in all the languages of the countries where the company is present, which offers the possibility of opening a secure mailbox where users can submit reports and provide complementary information in various formats (in writing, voice messages, etc.). All the information is confidential and, if the whistleblower wishes, anonymous.

The new digital channel has been implemented in accordance with the requirements of the Whistleblower Protection Act and in line with international legal requirements, which derive from Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 (the "Whistleblowing Directive").

Compliance with this new law has led to the modification of the Whistleblowing Channel Rules, which set out the general principles of the system and how it is managed

The Group provides all the workers in its value chain with various communications channels, anonymous or otherwise, so they can submit any information or proposals regarding human rights, the environment or any other concerns, and they are publicly accessible both on the corporate website and in the Sustainable Procurement Policy.

S2-3-27 c)	*The undertaking shall describe*: ***(c) the processes through which it supports or requires the availability of such channels in the workplace of value chain workers.***

As indicated in the Sustainable Procurement Policy, workers may access these channels for submitting reports and communications whenever they wish. They are anonymous if the worker so requests at the time. The communications and/or reports received are reviewed and studied in detail by the Compliance Body, which is responsible for the company's Internal Whistleblowing System.

S2-3-27 d) *AR 27*	*The undertaking shall describe*: ***(d) how it tracks and monitors issues raised and addressed, and how it ensures the effectiveness of the channels, including through involvement of stakeholders who are the intended users.***

As indicated in the Sustainable Procurement Policy, workers may access these channels for submitting reports and communications whenever they wish. They are anonymous if the worker so requests at the time. The communications and/or reports received are reviewed and studied in detail by the Compliance Body, which is responsible for the company's Internal Whistleblowing System.

The Whistleblowing Channel Rules state that all internal and/or external persons may report irregularities or breaches that are unethical, lack integrity or violate the guidelines set out in the Professional Code of Conduct, and that all communications received will be treated confidentially.

S2-3-28 AR 25 and AR 26	*The undertaking shall disclose whether and how it assesses that value chain workers are aware of and trust these structures or processes as a way to raise their concerns or needs and have them addressed. In addition, the undertaking shall disclose whether it has policies in place regarding the protection of individuals that use them against retaliation. If such information has been disclosed in accordance with ESRS G1-1, the undertaking may refer to that information.*

The information relating to this indicator was disclosed under ESRS G1-1. However, the Company would like to stress that, as stated in its Sustainable Procurement Policy, workers may access these channels for submitting reports and communications whenever they wish. They are anonymous if the worker so requests at the time. The communications and/or reports received are reviewed and studied in detail by the Compliance Body, which is responsible for the company's Internal Whistleblowing System.

These whistleblowing and communication channels are mentioned in both the Sustainable Procurement Policy and in the Supplier ESG Commitment or Code of Conduct.

These documents must be complied with and accepted by all of CIE Automotive's suppliers. Therefore, all of its workers are aware and cognizant of the existence of these whistleblowing and communication channels.

3.2.2.4 DR S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

S2-4-31 AR 28	*The undertaking shall provide a summarised description of the action plans and resources to manage its material impacts, risks, and opportunities related to value chain workers as per ESRS 2 MDR-A Actions and resources in relation to material sustainability matters.*

Action	**Performance ESG IRO Analysis (IRO Matrix, Geopolitic-CatNat Matrix, ESG Matrix by type of purchase)**
Results	Status check and mitigation of Supply Chain Risks.
Scope	The entire CIE Automotive Group and the workers in its value chain.
Horizons	Short term 2026
Actions	Carry out IRO studies to establish the Group's risk situation and determine the possible groups of workers, types of purchases and regions that are more susceptible or at greater risk in the value chain. The results do not require further action due to the quantification of the impacts of the identified IROS. This analysis addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour. A review of the IROS matrix has been carried out, introducing the following three variables into the risk analysis: The seven fundamental subjects of the ISO 20400 standard, aligned with ISO 26000: - 1. Organisational governance - 2. Human rights - 3. Labour practices - 4. Environment - 5. Fair operating practices - 6. Consumer issues - 7. Community involvement and development The Global Slavery Index (GSI): The Global Slavery Index (GSI) has been introduced as a means of assessing and measuring risks and opportunities. It rates each country according to its risk of modern slavery violations: https://www.walkfree.org/global-slavery-index/

	SDGs (Sustainable Development Goals) of the Global Compact: We include in the analysis the SDGs linked to each IRO and each objective set by the Group, in order to identify links and align ourselves with the commitments of the Global Compact. In this way, we establish an interconnection in each internal IRO, detecting in the Double Materiality the respective SDGs that we understand to be affected, and linked in turn to the Group's short- and medium-term objectives, as well as to each of the Fundamental Subjects of ISO 20400, and the actions in each of the Group's processes or procedures.
Information	The results obtained from the matrices were not considered material, or it was not considered necessary to allocate further resources given the current mitigation projects.
Description of associated CapEx and OpEx	No specific CapEx required.

Action	**ISO 20400 Certification in Sustainable Procurement**
Results	International reference standard issued by an external international expert in Sustainable Procurement. Adoption of sustainable processes and standards in the procurement process throughout the CIE Automotive Group.
Scope	The entire CIE Automotive Group and the workers in its value chain.
Horizons	Medium term. The certification expires in three years, but requires an annual renewal with the corresponding annual external audit.
Actions	Satisfactory assessment in the annual audits required to obtain ISO 20400 Certification. To this end, the procedures/requirements/policies/manuals are updated with regard to sustainability, human rights and environmental matters, as well as any points arising from the audits carried out by the external specialist. This certification and each of its reassessments address all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Information	The ISO 20400 certification reinforces the Group's sustainability policies by extending them to its entire supply chain and lays the foundation for further progress in ESG: - Ensuring supply chain safety. - Avoiding human and labour rights, financial, environmental, and reputational risks. - Instilling confidence in investors, customers and other stakeholders. - Promoting employee welfare and helping open new markets for products and services. - Being prepared to achieve decarbonisation targets.
Description of associated CapEx and OpEx	As mentioned throughout this report, the environmental management plan is coordinated and linked to the company's Strategic Plan. The Company's Strategic Plan calls for EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. The above figures are for the Strategic Plan as a whole and not just for one action or just for the environmental area, nor for one action or just for the procurement area. The OpEx is mainly linked to the group's R&D activities and was incorporated into its strategic lines. The company's OpEx allocated to this specific action is not material and is included in the amount mentioned in Note 20 to the 2025 Consolidated Financial Statements. Therefore, no breakdown is being reported by action, lever or line of work. In addition, the Corporate Human Resources Department has employees dedicated exclusively to supply chain sustainability management

Action	**Annual review and roll-out of supply chain management procedures**
Results	Updating to regulatory changes as well as customer requirements. Mitigation of risks in the supply chain.
Scope	The entire CIE Automotive Group and the workers in its value chain.
Horizons	Short term. Annual review.
Actions	Annual review and deployment of common supply chain management procedures aligned with the legal requirements of each country and the 2025 ESG Strategic Plan. Special mention of the Sustainable Procurement Policy, created and published in 2024 to strengthen the Group's relationship with workers in its value chain. This action addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Information	Study of developments in ESG criteria globally and locally in each region where the Group operates, to adapt to continuous regulatory changes and market requirements. Annual review and deployment of common supply chain management procedures aligned with the legal requirements of each country and the Group's ESG strategy. The necessary channels to raise concerns or needs have been made available to the value chain, as per AR28, including grievance mechanisms, hotlines, trade unions (where workers are unionised), works councils, engagement processes and other means through which the company's own workers and workers' representatives can raise concerns about impacts, or explain needs they would like the company to address.
Description of associated CapEx and OpEx	As mentioned throughout this report, the environmental management plan is coordinated and linked to the company's Strategic Plan. The Company's Strategic Plan calls for EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. The above figures are for the Strategic Plan as a whole and not just for one action or just for the environmental area, nor for one action or just for the procurement area. The OpEx is mainly linked to the group's R&D activities and was incorporated into its strategic lines. The company's OpEx allocated to this specific action is not material and is included in the amount mentioned in Note 20 to the 2025 Consolidated Financial Statements. Therefore, no breakdown is being reported by action, lever or line of work. In addition, the Corporate Human Resources Department has employees dedicated exclusively to supply chain sustainability management

Action	**Dual Control and monitoring of supply chain ESG/health**
Results	Monitoring and rating of the degree of compliance of the associates in the Group's value chain. Mitigation of risks in the supply chain.
Scope	The entire CIE Automotive Group and the workers in its value chain.
Horizons	Short term. Annual review.
Actions	- Internal: Supplier ESG portal: Provide the company an objective monitoring system for the ESG rating of its supply chain. Discrimination is made according to purchasing families, with the purchase of productive/direct materials being more stringent, establishing common minimum ESG requirements for all suppliers in the supply chain. - External: Through collaboration with Moody's Analytics, a leading global expert in human rights, environmental and governance risk detection systems. Constant monitoring of alerts for early identification of risks in the value chain. Definition of an action plan by the affected plant(s) and decision making that may result in the automatic termination of the commercial relationship if the supplier is not in compliance with the requirements demanded by CIE Automotive, for both direct suppliers and those suppliers' suppliers. This action addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all. - Other labour-related rights: forced labour, child labour.
Information	Monitoring and rating of the degree of compliance of the associates in the Group's value chain. Mitigation of risks in the supply chain.
Description of associated CapEx and OpEx	As mentioned throughout this report, the environmental management plan is coordinated and linked to the company's Strategic Plan. The Company's Strategic Plan calls for EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. The above figures are for the Strategic Plan as a whole and not just for one action or just for the environmental area, nor for one action or just for the procurement area. The OpEx is mainly linked to the group's R&D activities and was incorporated into its strategic lines. The company's OpEx allocated to this specific action is not material and is included in the amount mentioned in Note 20 to the 2025 Consolidated Financial Statements. Therefore, no breakdown is being reported by action, lever or line of work. In addition, the Corporate Human Resources Department has employees dedicated exclusively to supply chain sustainability management

Action	**Internal scorecard for quarterly monitoring of Environmental, Social and Governance (ESG) indicators**
Results	Monitoring of the degree of compliance of each of the Group's production plants in ESG aspects. ESG indicators of the 2025 ESG Strategic Plan. Mitigation of risks in the supply chain.
Scope	The entire CIE Automotive Group and the workers in its value chain.
Horizons	Short term. Quarterly review.
Actions	Each site must identify the additional actions that need to be implemented to achieve the Group's objectives and thus meet the targets set in the 2025 ESG Strategic Plan, and report them on a shared internal platform. This action addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Information	Monitoring of the degree of compliance of each of the Group's production plants in ESG aspects. ESG indicators of the 2025 ESG Strategic Plan. Mitigation of risks in the supply chain.

Description of associated CapEx and OpEx	As mentioned throughout this report, the environmental management plan is coordinated and linked to the company's Strategic Plan. The Company's Strategic Plan calls for EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. The above figures are for the Strategic Plan as a whole and not just for one action or just for the environmental area, nor for one action or just for the procurement area. The OpEx is mainly linked to the group's R&D activities and was incorporated into its strategic lines. The company's OpEx allocated to this specific action is not material and is included in the amount mentioned in Note 20 to the 2025 Consolidated Financial Statements. Therefore, no breakdown is being reported by action, lever or line of work. In addition, the Corporate Human Resources Department has employees dedicated exclusively to supply chain sustainability management

Action	**Internal and external training on environmental, social and governance (ESG) issues**
Results	Monitoring and compliance with the level of training of each of the Group's production plants in ESG aspects. 100% of plants trained and informed. Mitigation of risks in the supply chain
Scope	The entire CIE Automotive Group and the workers in its value chain.
Horizons	Short term. Annual review.
Actions	Dual training in ESG, Human Rights, Environmental aspects: - Internal: Annual roadshows on-site or off-site focused on continuous internal ESG training for 100% of the procurement teams according to new corporate, regulatory or commercial requirements. - External for suppliers: Continue with ESG training for suppliers at local level with specific sessions and meetings and adherence to the programme promoted by the United Nations Global Compact to train CIE Automotive's SME suppliers worldwide in sustainable procurement. This action addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all. - Other labour-related rights: forced labour, child labour.
Information	Monitoring and compliance with the level of training of each of the Group's production plants in ESG aspects. 100% of plants trained and informed. Mitigation of risks in the supply chain.
Description of associated CapEx and OpEx	As mentioned throughout this report, the environmental management plan is coordinated and linked to the company's Strategic Plan. The Company's Strategic Plan calls for EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. The above figures are for the Strategic Plan as a whole and not just for one action or just for the environmental area, nor for one action or just for the procurement area. The OpEx is mainly linked to the group's R&D activities and was incorporated into its strategic lines. The company's OpEx allocated to this specific action is not material and is included in the amount mentioned in Note 20 to the 2025 Consolidated Financial Statements. Therefore, no breakdown is being reported by action, lever or line of work. In addition, the Corporate Human Resources Department has employees dedicated exclusively to supply chain sustainability management

Action	**Audits of processes and specific audits on environmental, social and governance (ESG) issues**
Results	Physical audits and self-assessments using ESG criteria to verify the suppliers' degree of compliance with human rights, environmental, quality, etc., issues and to verify their suitability to continue to form part of CIE Automotive's supplier list. Increased number of audits carried out from the previous year to cover a higher degree of compliance and to achieve risk mitigation in the supply chain.
Scope	The entire CIE Automotive Group and the workers in its value chain.
Horizons	Short term. Annual review.
Actions	Physical audits and self-assessments using ESG criteria to verify the suppliers' degree of compliance with human rights, environmental, quality, etc., issues and to verify their suitability to continue to form part of CIE Automotive's supplier list. This action addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Information	Physical audits and self-assessments using ESG criteria to verify the suppliers' degree of compliance with human rights, environmental, quality, etc., issues and to verify their suitability to continue to form part of CIE Automotive's supplier list.
Description of associated CapEx and OpEx	Specific OpEx may be required for the auditor to travel to each region of the Group, and will vary depending on whether the auditor is internal or external.

Action	***Supply Chain Race2Zero* project**
Results	Climate change adaptation and mitigation in the value chain
Scope	CIE Automotive's key suppliers, in terms of annual purchase volume, which are therefore likely to have greater emissions,
Horizons	The short-term horizon is set for 2025, the medium term for 2033 and the long term for 2050
Actions	This project was launched in 2022 and aims to align the objectives and actions of the value chain with those of CIE Automotive and, in turn, with those of its stakeholders. This action addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Information	Scope 3 accounts for the largest percentage of the Group's emissions, with category 1 having the greatest impact, which is why suppliers are key to aligning the entire value chain.
Description of associated CapEx and OpEx	As mentioned throughout this report, the environmental management plan is coordinated and linked to the company's Strategic Plan. The Company's Strategic Plan calls for EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. The above figures are for the Strategic Plan as a whole and not just for one action or just for the environmental area, nor for one action or just for the procurement area. The OpEx is mainly linked to the group's R&D activities and was incorporated into its strategic lines. The company's OpEx allocated to this specific action is not material and is included in the amount mentioned in Note 20 to the 2025 Consolidated Financial Statements. Therefore, no breakdown is being reported by action, lever or line of work. In addition, the Corporate Human Resources Department has employees dedicated exclusively to supply chain sustainability management

S2–4–32 a) *AR 38*	*In relation to material impacts, the undertaking shall describe:* ***(a) actions taken, planned or underway to prevent or mitigate material negative impacts on value chain workers.***

One of the Group's main risks is its supply chain not being aligned with its ESG commitments and with the requirements of its stakeholders (mainly customers and legislation). That is why a global action plan is being deployed to raise awareness and increase the ESG knowledge of all CIE Automotive workers, which is also a great opportunity: an opportunity for purchasing and procurement managers, following the successful model of supply chain management (Local Management of Local Application, GLOCAL) to become even more involved in transmitting ESG compliance requirements and duties, and opportunity for the supply chain, as CIE Automotive is a driver in the implementation of requirements and training on global regulatory requirements.

The aim is to create a strong, flexible and resilient supply chain aligned with the SDGs.

Risk mitigation involves:

- Creating ESG risk matrices specific to the supply chain:
    - IROs of risks according to the ESG strategic plan (e.g., the EU's Carbon Border Adjustment Mechanism requirement, CBAM). Ensuring their monitoring, impacts and compliance by the non-European supply chain.
    - Geopolitical risks *(Nat-Cat)*
    - Risks by type of purchase (production/direct materials - non-production/indirect materials)
- Annual renewal of the externally verified ISO 20400 Sustainable Procurement Certification, which guarantees the correct management of the ESG function.
- Annual review and deployment of common supply chain management procedures aligned with the legal requirements of each country and the Group's ESG strategy.
- Formulating new procedures/policies for proper global supply chain management, such as the Sustainable Procurement Policy.
- Ensuring that the Group's purchasing teams are aware of the requirements of the CSDDD, which obliges companies to respect human rights, workers in the value chain and environmental protection throughout their value chain.
- Dual Control and monitoring of supply chain ESG/health:
    - <u>Internal:</u> Supplier ESG portal. Provide the organisation an objective monitoring system for the ESG rating of its supply chain. Discrimination is made according to purchasing families, with purchases of production/direct materials being the most stringent. Establishing common minimum ESG requirements for all suppliers in the supply chain.
    - <u>External:</u> Through MOODY'S ANALYTICS, a leading global expert in human rights, environmental and governance risk detection systems. Constant monitoring of alerts for early identification of risks in the value chain. Definition of an action plan by the affected plant(s) and decision making that may result in the automatic termination of the commercial relationship if the supplier is not in compliance with the requirements demanded by CIE, for both direct suppliers and those suppliers' suppliers.
- CIE Automotive's commitment to comply with the European Sustainability Reporting Directive (CSRD) and the requirement for its supply chain to comply with the Corporate Sustainability Due Diligence Directive (CSDDD), in accordance with OECD standards. The contracts, the Global Supply Chain Manual, and the General Purchasing Conditions must be aligned with the above legislation.
- Scorecard for quarterly monitoring of the supply chain's ESG indicators. Each plant must identify the further actions that need to be implemented to achieve the Group's objectives.
- ESG training:
    - <u>Internal:</u> Annual roadshows on-site or off-site focused on continuous internal ESG training for 100% of the procurement teams according to new corporate, regulatory or commercial requirements.
    - <u>External for suppliers:</u> Continue with ESG training for suppliers at local level with specific sessions and meetings and adherence to the programme promoted by the UN's Global Compact to train CIE Automotive's SME suppliers worldwide in sustainable procurement.
- Promote ESG audits globally. Have each plant conduct physical audits of its critical suppliers as part of verifying actual compliance.
- Supply Chain Race2Zero project: Corporate impulse and local implementation to obtain emission reduction compliance commitments aligned with the 2050 targets.

Similarly, the actions taken to verify compliance and possible material impacts that may arise associated with workers in the value chain are detailed in both their form and the resources allocated in response to *S2-4-31.*

S2-4-32 b)	*In relation to material impacts, the undertaking shall describe*: ***(b) whether and how it has taken action to provide or enable remedy in relation to an actual material impact.***

The response to *S2-4-31* details the actions CIE Automotive has taken to promote positive impacts on the workers in its value chain. In addition, the response to *S2-3-27 a)* details the processes already in place remedy possible non-compliance, and finally, as shown under *SBM-2-9*, the Company discloses the documentation associated with this requirement.

S2-4-32 c) *AR 39*	*In relation to material impacts, the undertaking shall describe*: ***(c) any additional actions or initiatives it has in place with the primary purpose of delivering positive impacts for value chain workers.***

The response to *S2-4-31* details the actions CIE Automotive has taken to promote positive impacts on the workers in its value chain. In addition, the response to *S2-3-27 a)* details the processes already in place remedy possible non-compliance, and finally, as shown under *SBM-2-9*, the Company discloses the documentation associated with this requirement.

S2-4-32 d) *AR 33 and 35*	*In relation to material impacts, the undertaking shall describe*: ***(d) how it tracks and assesses the effectiveness of such actions and initiatives in delivering intended outcomes for value chain workers.***

One of the measures taken to monitor and measure effectiveness in cases such as Environmental, Social and Governance (ESG) training and the annual review and deployment of the supply chain management procedures, is that the internal training sessions are recorded then shared with the attendees themselves and with stakeholders who were unable to attend the specific sessions.

In addition, they are stored as a repository so that the training is not lost and is always available to interested parties, and also can be analysed for further training. This is done in all the regions in which the Group operates.

In addition, when conducting supplier audits, CIE Automotive assesses its suppliers' financial position as a measure to guarantee their supplies for the duration of the projects. These assessments are carried out through process audits that consider and weigh various parameters such as planning, supplier management, reception, training and qualification, processes, maintenance, inspections, packaging, storage, continuous improvement and environment, customer satisfaction, documentation and ESG criteria.

These audits can be shared with the supplier, and the supplier assesses itself, with subsequent validation by CIE Automotive's qualified personnel to verify the information received. Thanks to this system of self-assessment and on-site audits, 849 audits were carried out in 2025, compared to 772 in 2024, an increase of 10%. The Group has set itself the challenge of increasing the number of audits by 10% for 2026, with an increase in the number of on-site audits.

The fact that 100% of the audits carried out included ESG analysis criteria, and that all of them ended with a satisfactory result, is another way of measuring the effectiveness of the measures implemented in this area.

Moreover, the response to *S2-4-31* details the actions CIE Automotive has taken to promote positive impacts on the workers in its value chain. The procedures for remedying possible non-compliances are detailed under *S2-3-27 a)*, and the documentation associated with this requirement is reported under *SBM-2-9*.

Lastly, it is important to note that the external and anonymous whistleblowing and communication channel is monitored annually with the workers in the value chain to analyse the effectiveness of the policies and procedures established in the area of human rights, as detailed in the Group's Sustainable Procurement Policy.

S2–4–33 a) *AR 29*	*In relation to paragraph 30, the undertaking shall describe: **(a) the processes through which it identifies what action is needed and appropriate in response to a particular actual or potential negative impact on value chain workers.***

The audits that the Supply Chain Department conducts annually to exceed compliance with human rights, environmental and other Environmental, Social and Governance (ESG) criteria, to obtain and renew ISO 20400 certification, are a way to identify the necessary and appropriate actions in response to a particular actual or potential negative impact on workers in the value chain.

External audit and ESG alerts provided by the external company Moodys Analytics:

Assessment by one of the world's leading ESG rating and rating companies to verify the ESG compliance of over 90% of the global procurement volume, and to identify potential violations of environmental, social, human rights, etc., criteria., covering topics such as:

- *RED FLAGS* (sanctions, human rights, environment, business conduct, corporate governance...)
- ESG alerts
- Sanctions (local and international)
- Risk of default or insolvency
- News on breaches of the law
- Anti-bribery and corruption alerts

Moreover, the response to *S2-4-31* details the actions CIE Automotive has taken to promote positive impacts on the workers in its value chain. The procedures for remedying possible non-compliances are detailed under *S2-3-27 a)*, and the documentation associated with this requirement is reported under *SBM-2-9*.

Lastly, it is important to note that the external and anonymous whistleblowing and communication channel is monitored annually with the workers in the value chain to analyse the effectiveness of the policies and procedures established in the area of human rights, as detailed in the Group's Sustainable Procurement Policy.

S2-4-33 b)	*In relation to paragraph 30, the undertaking shall describe **(b) its approach to taking action in relation to specific material negative impacts on value chain workers, including any action in relation to its own purchasing or other internal practices, as well as capacity- building or other forms of engagement with entities in the value chain, or forms of collaborative action with industry peers or other relevant parties.***

Supplier audits

CIE Automotive assesses its suppliers' financial position as a measure to guarantee their supplies for the duration of the projects. These assessments are carried out through process audits that consider and weigh various parameters such as planning, supplier management, reception, training and qualification, processes, maintenance, inspections, packaging, storage, continuous improvement and environment, customer satisfaction, documentation and ESG criteria. These audits can be shared with the supplier, and the supplier assesses itself, with subsequent validation by CIE Automotive's qualified personnel to verify the information received.

Thanks to this system of self-assessment and on-site audits, 849 audits were carried out in 2025, compared to 772 in 2024, an increase of 10%. The Group has set itself the challenge of increasing the number of audits by 10% for 2026, with an increase in the number of on-site audits.

Tools for controlling and assessing the measurement system

Suppliers must perform Repeatability and Reproducibility, Linearity, Bias and Stability tests on all the gauges and measuring instruments they use to measure critical and/or significant characteristics identified in the Control Plan. They must run these tests periodically or whenever any changes are made to the measurement system, operator, inspection calibrator or inspection method.

Special processes

The Pre-Release Control Plan, the SOP Containment Plan and the Quality Firewall are additional, temporary activities to increase the level of confidence to ensure that all the products suppliers ship meet CIE Automotive's requirements. The purposes of these additional procedures are to:

- Protect the CIE Automotive site from quality non-conformities during critical periods such as launch, start-up and ramping-up of production, quality issues during mass production or after the manufacturing process review, or when manufacturing batches are separated by a year or more.
- The pre-release control plan will serve to validate the Production Control Plan and should take into account all known critical conditions of the part, as well as any potential areas of concern identified during the development phases for new projects or modifications.
- Ensure that any quality issues that may arise are quickly identified, contained and corrected at the supplier's location.
- Increase the engagement and visibility of the supplier's senior management.
- Product performance management (PPM): this is a measurement system relating to the quality commitments of a part, component or material. It indicates the number of non-conforming parts in the process.

Contingency plan. Supplier risk management

The supplier must prepare contingency plans to meet CIE Automotive's requirements in case of any interruption in the production and delivery of parts. The supplier must notify its contact at CIE Automotive within a maximum of 12 hours.

It should notify it of the nature of the problem and take measures to ensure the supply of its product. Production disruptions could include, without limitation, natural disasters, political instability, war, capacity problems, quality problems, labour strikes, unplanned production stoppages and other events that prevent the supplier from meeting the required volumes or complying with any APQP event within the launch (e.g.: R@R or PPAP).

APQP, or Advanced Product Quality Planning, is a systematic structure used in product development and manufacturing to ensure that the products or processes created will meet the company's quality standards and customer specifications.

Ethical framework

CIE Automotive's actions must ensure that its internal and external workers all behave ethically.

Professional Code of Conduct

This Professional Code of Conduct will apply, without exception, to all everyone who belongs to the Group. Knowledge of, and compliance with, the rules of conduct set out in it are mandatory for all, and under no circumstances will ignorance of the rules exempt them from compliance.

In addition, CIE Automotive, S.A., will encourage its business partners (joint ventures, suppliers, customers, contractors and business partners) to act in a manner consistent with this code and to apply ethics programmes that are consistent with its standards. The Group will take appropriate action if there is evidence that its partners have not complied with its policies or their contractual obligations.

Due diligence guidance

CIE Automotive is aligning itself with the new Due Diligence Directive (CSDDD) and OECD recommendations to identify, prevent and manage the impact that the Company's operations may have on human rights and the environment.

Thus, the Company will extend its knowledge and experience to its own suppliers, seeking to strengthen its supply chain's commitment to respect human, labour and environmental rights, and identifying risks of violation of any of these rights in the suppliers' countries of origin.

Stance against corruption and bribery

Compliance with this policy is mandatory for all directors, officers, employees and workers of all Group companies, without exception. In addition, any third parties participate, intermediate, or act for or on behalf of CIE Automotive S.A., in transactions and business affairs must follow the guidelines and principles of this policy.

Whistleblowing Channel

CIE Automotive has established a procedure for handling reports and queries regarding breaches or irregularities under the Professional Code of Conduct. All members of the organisation and any of its stakeholders can use it to make enquiries or report unusual activities or breaches of the rules set out in the Professional Code of Conduct using the platform provided both on the corporate intranet and on the corporate website.

The Group also encourages its business partners (joint ventures, suppliers, customers, contractors and other partners) to align their conduct with the Code and apply equivalent ethical standards. Suppliers are recommended to have their own whistleblowing channel (linked to Due Diligence).

S2-4-33 c)	*In relation to paragraph 30, the undertaking shall describe* ***(c) how it ensures that processes to provide or enable remedy in the event of material negative impacts are available and effective in their implementation and outcomes.***

The response to *S2-4-31* details the actions CIE Automotive has taken to promote positive impacts on the workers in its value chain. The procedures for remedying possible non-compliances are detailed under *S2-3-27 a)*, and the documentation associated with this requirement is reported under *SBM-2-9*.

It is important to note that the external and anonymous whistleblowing and communication channel is monitored annually with the workers in the value chain to analyse the effectiveness of the policies and procedures established in the area of human rights, as detailed in the Group's Sustainable Procurement Policy.

S2–4–34 a) AR 40, 41 and 43	*In relation to material risks and opportunities, the undertaking shall describe*: ***(a) what action is planned or underway to mitigate material risks for the undertaking arising from its impacts and dependencies on value chain workers and how it tracks effectiveness in practice.***

The response to *S2-4-31* details the actions CIE Automotive has taken to mitigate material risks to the Company arising from its impacts and dependencies on value chain workers and how it tracks effectiveness in practice, as well as to promote positive impacts on value chain workers.

The procedures for remedying possible non-compliances are detailed under *S2-3-27 a)*, and the documentation associated with this requirement is reported under *SBM-2-9*.

External audit and ESG alerts provided by the external company Moodys Analytics:

Assessment by one of the world's leading ESG rating and rating companies to verify the ESG compliance of over 90% of the global procurement volume, and to identify potential violations of environmental, social, human rights, etc., criteria., covering topics such as:

- *RED FLAGS* (sanctions, human rights, environment, business conduct, corporate governance...)
- ESG alerts
- Sanctions (local and international)
- Risk of default or insolvency
- News on breaches of the law
- Anti-bribery and corruption alerts

Lastly, it is important to note that the external and anonymous whistleblowing and communication channel is monitored annually with the workers in the value chain to analyse the effectiveness of the policies and procedures established in the area of human rights, as detailed in the Group's Sustainable Procurement Policy.

S2-4-34 b)	*In relation to material risks and opportunities, the undertaking shall describe*: ***(b) what action is planned or underway to pursue material opportunities for the undertaking in relation to value chain workers.***

The response to this indicator is provided under *S2-4-34 a) RA 40, 41 and 43.*

S2–4–35 AR 32	*The undertaking shall disclose whether and how it takes action to avoid causing or contributing to material negative impacts on value chain workers through its own practices, including, where relevant, in relation to procurement, sales and data use. This may include disclosing what approach is taken when tensions arise between the prevention or mitigation of material negative impacts and other business pressures.*

The response to this indicator is provided under *S2-4-34(a) RA 40, 41 and 43.*

In addition, the Company's right to terminate any business relationship with a supplier unilaterally and without liquidated damages if the supplier is identified to not be in compliance and fails to remedy this, is detailed under *S2-SBM-2-9*. This is set out in its General Purchasing Conditions detailed throughout the report.

S2–4–36	*The undertaking shall also disclose whether severe human rights issues and incidents connected to its upstream and downstream value chain have been reported and, if applicable, disclose these.*

As in 2024, no complaints were received in 2025 regarding human rights abuses related to the upstream and downstream stages of its value chain.

S2–4–38	*The undertaking shall disclose what resources are allocated to the management of its material impacts, with information that allows users to gain an understanding of how the material impacts are managed.*

The resources that CIE Automotive allocates to manage material impacts are both financial and human. The Corporate Human Resources Department has employees dedicated exclusively to supply chain sustainability management.

Furthermore, as mentioned throughout this report, the Company's Environmental Management Plan is coordinated with, and linked to, its Strategic Plan. This plan already called for EUR 1 billion in CapEx from 2020 to 2025, which is approximately 5% per year of sales. The OpEx is mainly linked to the group's R&D activities and was incorporated into its strategic lines.

The company's OpEx allocated to this specific action is not material and is included in the amount mentioned in Note 20 to the 2025 Consolidated Financial Statements. Therefore, no breakdown is being reported by action, lever or line of work.

3.2.3 Metrics and targets

3.2.3.1 DR S2-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S2–5–41 AR 46 and 48	*The summarised description of the targets to manage its material impacts, risks and opportunities related to value chain workers shall contain the information requirements defined in ESRS 2 MDR-T.*

Objective	**Increased number of audits of processes and specific audits on environmental, social and governance (ESG) issues**
Description	Physical audits and self-assessments using ESG criteria to verify the suppliers' degree of compliance with human rights, environmental, quality, etc., issues and to verify their suitability to continue to form part of CIE Automotive's supplier list. This target addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Target level	Relative target.
Scope	The entire CIE Automotive Group and the workers in its value chain.
Base year	2023
Period	Annual
Hypothesis	The hypotheses and assumptions are those set out in the Group's risk assessment.
Stakeholders concerned	Management, Quality, Environment, Supply Chain, Suppliers, Customers, Investors.

Geographical regions	All locations where the Group is present.
Variations	No significant variations
Performance	It is progressing positively and is expected to be achieved within the committed timeframe

Objective	**New phase of the Supply Chain Race2Zero project**
Description	Climate change adaptation and mitigation in the value chain. Scope 3 accounts for the largest percentage of the Group's emissions, with category 1 having the greatest impact, which is why suppliers are key to aligning the entire value chain. Short- to medium-term objectives: CIE Automotive is committed to reducing its absolute Scope 3 GHG emissions by 54.6% by 2033 from 2021 as a base year.
Target level	Absolute target
Scope	The entire CIE Automotive Group and the workers in its value chain.
Base year	2021
Period	2033
Hypothesis	The hypotheses and assumptions are those set out in the climate risk analysis and scenarios
Scientific evidence	Aligned with the 1.5° strategy of the Paris Agreement
Stakeholders concerned	Management, Quality, Environment, Supply Chain, Suppliers, Customers, Investors.
Geographical regions	All locations where the Group is present.
Variations	No significant variations
Performance	It is progressing positively and is expected to be achieved within the committed timeframe

Objective	**Renew ISO 20400 Certification in Sustainable Procurement**
Description	Successfully pass the annual audit required to obtain ISO 20400 Certification. To this end, the procedures/requirements/policies/manuals are updated with regard to sustainability, human rights and ESG matters, as well as any points arising from the audits carried out by the external specialist. This target addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Target level	Absolute target
Scope	The entire CIE Automotive Group and the workers in its value chain.
Base year	2021
Period	Three-year expiry, annual renewal
Hypothesis	The hypotheses and assumptions are those set out in the external auditor's risk assessment.
Stakeholders concerned	Management, Quality, Environment, Supply Chain, Suppliers, Customers, Investors.
Geographical regions	All locations where the Group is present.
Variations	No significant variations
Performance	It is progressing positively and is expected to be achieved within the committed timeframe

Objective	**Continuing internal and external ESG training and outreach**
Description	Monitoring and compliance with the degree of training of each of the Group's production plants in ESG aspects, reaching 100% of the plants trained and informed. Similarly, to cover as much of the supply chain as possible. This target addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety.

	- Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Target level	Absolute target
Scope	The entire CIE Automotive Group and the workers in its value chain.
Base year	2023
Period	Annual
Hypothesis	The hypotheses and assumptions are those set out in the Group's risk assessment.
Stakeholders concerned	Management, Quality, Environment, Supply Chain, Suppliers, Customers, Investors.
Geographical regions	All locations where the Group is present.
Variations	No significant variations
Performance	It is progressing positively and is expected to be achieved within the committed timeframe

Objective	**External rating of supply chain ESG/health**
Description	Extend the coverage together with a leading global expert in human rights, environmental and governance risk detection systems. Constant monitoring of alerts for early identification of risks in the value chain. Definition of an action plan by the affected plant(s) and decision making that may result in the automatic termination of the commercial relationship if the supplier is not in compliance with the requirements demanded by CIE Automotive, for both direct suppliers and those suppliers' suppliers. Cover more risks, concepts analysed, as well as suppliers and the Group's purchasing volume. This target addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.
Target level	Absolute target
Scope	The entire CIE Automotive Group and the workers in its value chain.
Base year	2023
Period	Annual
Hypothesis	The hypotheses and assumptions are those set out in the Group's risk analysis, as well as in legislation and the requirements of customers or other stakeholders.
Stakeholders concerned	Management, Quality, Environment, Supply Chain, Suppliers, Customers, Investors.
Geographical regions	All locations where the Group is present.
Variations	No significant variations
Performance	It is progressing positively and is expected to be achieved within the committed timeframe

Objective	**Supply Chain ESG Recognition**
Description	Training days in various countries where the suppliers with the best ESG performance are rewarded and are a direct channel for transmitting knowledge and receiving any suggestions/complaints. This target addresses all the material IROs identified in the dual materiality analysis: - Working conditions: freedom of association, health and safety. - Equal treatment and opportunities for all: diversity and measures against violence and harassment in the workplace. - Other labour-related rights: forced labour, child labour.

Target level	Absolute target
Scope	The entire CIE Automotive Group and the workers in its value chain.
Base year	2023
Period	Annual
Hypothesis	The hypotheses and assumptions are those set out in the Group's risk analysis, as well as in legislation and the requirements of customers or other stakeholders.
Stakeholders concerned	Management, Quality, Environment, Supply Chain, Suppliers, Customers, Investors.
Geographical regions	All locations where the Group is present.
Variations	No significant variations
Performance	It is progressing positively and is expected to be achieved within the committed timeframe

S2- 5-42 a)	*The undertaking shall disclose the process for setting the targets, including whether and how the undertaking engaged directly with workers in the value chain, their legitimate representatives, or with credible proxies that have insight into their situation in:* ***(a) setting any such targets.***

CIE Automotive uses its dual materiality analysis to identify impacts and set targets. It also proposes to engage its value chain workers through the various public channels for receiving proposals, so it can set benchmarks and adapt its internal policies, procedures and requirements. The Sustainable Procurement Policy details the various communication channels available.

S2- 5-42 b)	*The undertaking shall disclose the process for setting the targets, including whether and how the undertaking engaged directly with workers in the value chain, their legitimate representatives, or with credible proxies that have insight into their situation in:* ***(b) tracking the undertaking's performance against them.***

The response to *S2-SBM2-9* details the monitoring of the Company's performance against Environmental, Social and Governance (ESG) criteria.

S2- 5-42 c)	*The undertaking shall disclose the process for setting the targets, including whether and how the undertaking engaged directly with workers in the value chain, their legitimate representatives, or with credible proxies that have insight into their situation in:* ***(c) identifying any lessons or improvements as a result of the undertaking's performance.***

The response to *S2-SBM2-9*, when referring to the Sustainable Purchasing Policy, details the various communication channels available for receiving proposals, so it can set benchmarks and adapt its internal policies, procedures and requirements.

3.3 Customers (*Entity-specific disclosures*) (ES)

3.3.1 DR SBM-2: Interests and views of stakeholders

ESRS 2 -SBM-2	*The undertaking shall disclose how the interests and views of its stakeholders are taken into account by the undertaking's strategy and business model.*

The information in response to this disclosure requirement is addressed in *section 1.1.3.2. ESRS 2- SBM-2 Interests and views of stakeholders*.

3.3.2 DR SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

ESRS 2 -SBM-3	*The undertaking shall disclose its material impacts, risks and opportunities and how they interact with its strategy and business model.*

In the area of personal safety of end users and consumers, CIE Automotive has identified impacts and opportunities. One significant positive impact stems from designing more robust parts that contribute to increased vehicle safety. Implementing these robust designs not only improves occupant protection in the event of an accident, reducing the severity of injuries, but also increases consumer confidence in the brand, which is essential for its reputation and market positioning.

In addition, this improved safety presents a financial opportunity for the Company. Although it may initially require investment in research and development, in the long term, designing more robust parts can result in reduced costs associated with insurance claims and legal liabilities. This strategy can also strengthen customer loyalty and increase market share by positioning the Company as a leader in safety.

CIE Automotive stands out as a benchmark for total quality in the automotive components industry. Its reputation is based on the constant improvement of its products and processes through prevention, systematic reviews, training and knowledge sharing, in accordance with its Environmental Policy.

With its focus on excellence, the Company complies with the international quality standard IATF 16949, a specific standard for the automotive industry, which harmonises the various supply chain assessments and certification systems. It is also working towards environmental management (ISO 14001) and health and safety (ISO 45001) certification in all its production plants.

Compliance with the IATF 16949 standard means compliance with consumer health and safety measures, although the company has no contact with the end users of the vehicles, as it is a B2B business. However, its Original Equipment Manufacturer (OEM) customers issue CIE Automotive both order specifications and project and product requirements, to ensure that each component contributes to guaranteeing the safety of the vehicle they finally put on the market. It should be noted that the IATF 16949 standard ensures that the expectations and requirements of the end customer are deployed throughout the supply chain and that it aims for robustness of the final product and compliance with standards of repairability, durability and recyclability that are required by regulation. This is sought to be achieved in the following ways:

1. Focus on defect prevention: the standard promotes a culture oriented towards the prevention of defects instead of their detection. This includes tools such as failure mode and effects analysis (FMEA), which identifies potential risks in design or manufacturing processes to minimize failures, or production process control, which ensures products are consistent and meet specifications. This helps to create a more robust and reliable product from its development.

2. Customer-specific requirements (CSR): the standard obliges manufacturers to comply with specific customer requirements (OEMs), which means that processes are customized according to the needs of the end customer, ensuring satisfaction and products adjusted to their expectations.

3. Focus on continuous improvement: by using continuous improvement principles (such as the Plan-Do-Check-Act cycle), the standard ensures that organizations are constantly working to improve product quality, optimize processes, and reduce costs. This leads to more robust and reliable products.

4. Risk Management and Root Cause Analysis: IATF 16949 requires identifying, evaluating, and mitigating risks that may affect product quality. This includes proactively managing risks throughout the supply chain and reviewing and resolving issues using a systematic root cause analysis approach.

5. Focus on customer satisfaction: the standard includes requirements to measure and evaluate customer perception, which obliges organizations to constantly monitor whether they are meeting end-customer expectations, from product performance to reliability and quality.

6. High standards throughout the supply chain: certification also ensures that suppliers within the automotive supply chain work under the same rigorous quality standards, ensuring consistency in the components used and therefore the robustness of the final product.

This same deployment of requirements towards suppliers, as is the case with CIE Automotive, means that repairability, separation and recyclability requirements are taken into account to improve the end of life of the vehicle.

As indicated throughout this document, CIE Automotive does not deliver products directly to the end consumer and therefore the products are from the car manufacturer or OEM. This makes it up to the OEM to decide whether to introduce low-carbon products to the end market.

However, the contribution of the technology suppliers of the end manufacturers is key and especially through efficient and decarbonized production processes. These processes and technologies are critical to manufacturing low-carbon products, as they significantly reduce greenhouse gas (GHG) emissions over the product lifecycle, contributing to sustainability and meeting global climate neutrality goals.

This relationship is detailed below:

1. Reduction of emissions in the manufacturing stages: efficiency in production processes and the use of decarbonized technologies (clean energy, electrification, etc.) directly reduce the carbon emissions associated with manufacturing. Actions of this type have already been mentioned in the environmental section and the project to replace fossil fuels in furnaces is a key lever on this point. A cleaner process reduces the carbon footprint of the product from the start, helping the final product to be considered low-carbon.

2. Efficient use of resources and materials: optimizing the use of materials in production processes helps to reduce the environmental impact associated with the life cycle of the product. These are the strategies, actions or levers used and already mentioned throughout this document:

   - Minimization of waste: implementation of Industry 4.0 initiatives or "lean manufacturing" strategies.
   - Use of recycled or low-impact materials.
   - Reduction of the ratio of gross weight to net weight.
   - Reduced product weight through optimized design.

   Reduced use of raw materials means fewer emissions in their extraction, transport and processing.

3. Integration of decarbonized materials: the use of materials produced using decarbonized processes plays a key role in the design of low-carbon products. At this point, the materials project already mentioned in the environment section is key. Materials with a reduced carbon footprint contribute to making the final product more sustainable and the great impact of category 1 of scope 3 of the Group's carbon footprint can be observed.

4. Supply chain optimization: an efficient and decarbonized supply chain reduces indirect emissions (scope 3) associated with transportation and logistics. These are the strategies, actions or related levers discussed throughout the document that entail a lower carbon associated with the transport and distribution of the product:

   - Local production to minimize transport, CIE Automotive's local approach.
   - Project Supply Chain Race2Zero .

5. Circular economy in production: adopting circular economy principles allows for the design of more sustainable processes and products with a lower carbon footprint. These are the strategies, actions or levers with which the demand for new resources is reduced and, therefore, the emissions associated with their extraction and production.

   - Circularity projects mentioned.
   - Use of recycled and recyclable materials.

6. Product decarbonization through digitalization: the digitization of design and production processes (use of simulations, digital twins, IoT, etc.) allows design to be optimized, reduce defects, waste and foresee inefficiencies. These are the strategies, actions or levers that allow for lower energy and material consumption, contributing to a lower carbon footprint:

   - Reduction of physical prototypes through virtual simulations (Finite Elements, CFD, etc.).
   - Real-time control of energy consumption to reduce defect.
   - Optimisation of production cycles, Industry 4.0.
   - Process eco-design.

7. Energy-efficient products in use: efficient production processes not only reduce emissions from the process itself but also allow optimized products to be designed to be more efficient in their service life. Mainly through the lightening of components and the use of multi-material and multi-technology strategies, which fits perfectly with CIE Automotive's philosophy.

ES (Entity Specific) Customers - Impacts, Risks and Opportunities (IROs)

+: positive impact // -: negative impact // R: risk // O: opportunity

Subtopics	IROs
Personal safety of users and end-consumers	(+) Designing more robust parts that help boost vehicle safety.
	(O) Financial impacts arising from: Designing more robust parts that help boost vehicle safety.

3.3.3 DR IRO-1: Description of the process to identify and assess material impacts, risks and opportunities

ESRS 2 -IRO-1	*The undertaking shall disclose its process to identify its impacts, risks and opportunities and to assess which ones are material.*

The information in response to this disclosure requirement is addressed under *ESRS 2- IRO-1* and *ESRS 2- SBM-3- 48 f.*

3.3.4 DR - Policies MDR-P: Policies adopted to manage material sustainability matters

Title	**Professional Code of Conduct**
Description	CIE Automotive conducts its business and professional activities in accordance with a Professional Code of Conduct, which serves as an ethical guide at all levels of the organisation.
Objective	To provide ethical guidelines and principles of conduct for all directors, managers, employees and workers of all the companies that comprise the Group, determining the values and commitments that must govern their work activities within the Group. It was drawn up with the aim of meeting the demands of both stakeholders and society in general and thus continue to earn the commitment and trust they have placed in the Group.
Material Impacts, Risks and Opportunities	Corporate culture, corruption and bribery, customer relationship management, including charging practices, political participation and lobbying, and the Whistleblowing Channel Rules.
Scope of the policy	This Code of Conduct is binding for all members of the Group without exception. All employees have the obligation to understand and comply with these rules of conduct, and in no jurisdiction will ignorance of the law exempt them from compliance. CIE Automotive will also encourage its business partners or business associates (joint ventures, temporary joint ventures, suppliers, customers, contractors and collaborating companies) to act in accordance with this Code and to apply ethical programmes that are consistent with its standards. The Group will take appropriate action if it becomes clear that they have not complied with their policies or contractual obligations.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	The Professional Code of Conduct applies globally.
Body responsible for implementation	CIE Automotive's Board, through its Audit Committee, is ultimately responsible for the existence and application of the Professional Code of Conduct.
Availability	Public document posted on the Group's corporate website.

Title	**Policy on anti-competitive practices**
Description	This policy is part of the corporate governance and compliance policies and sets out the essential principles and guidelines that must be taken into account on a daily basis in the performance of professional duties and activities.
Objective	The purpose of the legislation on anti-competitive practices is to prohibit any business-related conduct that is contrary to the principle of free competition and harmful to the public interest. The ultimate aim of that legislation is therefore to protect free and fair competition, so that each company or corporate group will be making its own independent business decisions and creating its own independent strategies, rather than engaging in collaborations or other practices that could eliminate or restrict competition. These guidelines are of compulsory compliance, because in addition to being part of our compliance culture and Compliance Management System, they were designed to prevent the very serious consequences that any potential infringements of the legislation could have.
Material Impacts, Risks and Opportunities	Information-related IROs; personal safety of users and end-consumers.
Scope of the policy	The members of the Board and all of CIE Automotive's employees and collaborators, regardless of their type of relationship or contract. In addition, the rules and principles from this policy must be observed by all external parties that act for or on behalf of CIE Automotive, or that participate, collaborate, or act as intermediaries in relation to its operations or business affairs.
Stakeholders concerned	Customers and all members of CIE Automotive.
Geographical regions	This policy applies globally.

Value Chain	CIE Automotive will encourage its value chain to act in accordance with this policy. The Group will take appropriate action if there is certainty that practices that are categorically prohibited are taking place.
Body responsible for implementation	CIE Automotive's Board, through its Audit Committee, is ultimately responsible for the existence and application of this policy.
Availability	Public document posted on the Group's corporate website.

Title	**Sustainable procurement policy**
Description	CIE Automotive's sustainable procurement policy, based on ISO 20400 certification and the UNE-15896 standard on Value-Added Procurement Management, focuses on several key aspects that ensure sustainability and social responsibility in its operations. The main contents of this policy are described below:
Principles	CIE Automotive's Sustainable Procurement Policy is based on the global management of the impacts arising from its activity. The fundamental principles on which the policy is based are: - Environmental responsibility: Prioritise the purchase of materials and products that have a lower environmental impact throughout their life cycle. Positively value relationships with suppliers that have set decarbonisation targets. - Human and labour rights: Evaluate suppliers' performance to prevent any non-compliance or identify any supplier violations, promoting a culture of respect both internally and throughout the supply chain. - Promote equality, diversity, inclusion and non-discrimination: guaranteeing work-life balance, fair pay and people's safety and well-being, ensuring working conditions, and identifying and assessing the performance of suppliers and workers in the value chain in these areas to avoid any non-compliance, and recognising best practices. - Ethics and Transparency: Maintain fair, sustainable and transparent purchasing practices, ensuring compliance with applicable laws and legislation. - Commitment to suppliers: Work with suppliers who share our values and adhere to our standards of sustainability and social responsibility.
Objective	Compliance with the standards established in the ISO 20400 certification. This reinforces the Group's sustainability policies by extending them to its entire supply chain and lays the foundation for further progress in environmental, social and governance matters.
Material Impacts, Risks and Opportunities	IROs related to designing more robust parts that have an impact on increasing vehicle safety, as well as the financial effects of that design.
Scope of the policy	The scope of application of CIE Automotive's sustainable procurement policy is broad and encompasses all the activities, functional areas and regions related to purchasing and procurement, ensuring a comprehensive and consistent approach to sustainability and social responsibility throughout its supply chain.
Stakeholders concerned	Suppliers, customers, investors and shareholders, regulators and government agencies, and business partners and associates.
Geographical regions	This policy applies globally.
Value Chain	CIE Automotive's sustainable procurement policy affects several specific points in its value chain, including supplier selection and evaluation, internal procurement processes, risk management, employee training, and regulatory compliance. This ensures consistent and effective integration of sustainability and social responsibility practices throughout the supply chain, promoting a more ethical, safe and resilient value chain.
Body responsible for implementation	CIE Automotive's Board, through its Audit Committee, is ultimately responsible for the existence and application of this policy.
Availability	Public document posted on the Group's corporate website.

Title	**Quality policy**
Description	CIE Automotive stands out as a benchmark for total quality in the automotive components industry. Its reputation is based on the constant improvement of its products and processes through prevention, systematic reviews, training and knowledge sharing, in accordance with its Environmental Policy. The priorities of the quality policy are: protecting customers, being proactive, focusing on zero defects, and services and prevention to ensure safety.
Objective	Compliance with legislation related to quality, safety, marketing and labelling.
Material Impacts, Risks and Opportunities	IROs related to designing more robust parts that have an impact on increasing vehicle safety, as well as the financial effects of that design.
Scope of the policy	The scope of application of the quality policy is global, and it is a mandatory condition that must be fulfilled by all the Group's production plants.
Stakeholders concerned	Suppliers, customers, own workers, and regulators and government agencies.
Geographical regions	This policy applies globally.
Value Chain	CIE Automotive's sustainable procurement policy affects several specific points in its value chain, from design to end-of-life. The points affected are: product design and innovation, sourcing and supplier management, production and manufacturing, quality control and claims management, logistics and distribution, and end-of-life
Body responsible for implementation	CIE Automotive's CEO is ultimately responsible for the existence and application of this policy.
Availability	Public document posted on the Group's corporate website.

3.3.5 DR - Actions MDR-A: Actions and resources in relation to material sustainability matters

It is still too early to say when the automotive sector will return to pre-pandemic levels of production and sales, especially in view of the various trends that are introducing changes in the market at a very high speed. The company will therefore reinforce its flexibility model to adapt to current or future customer needs and the latest trends.

The diversification of its product portfolio will make it more adaptive, which will set it apart from its competitors. A portfolio where more than 8 out of 10 products are independent of the vehicle's propulsion system and therefore not impacted by the electrification process of the sector. For the remaining components, work is being done from both a technological and market perspective to maximise the opportunities that are emerging in the areas of batteries, engines and power electronics or gearboxes.

With regard to the risk of products that have no clear substitute in zero-emission vehicles, CIE Automotive intends to increase its presence in products that make the greatest contribution to making vehicles lighter (forged chassis and suspension components), and in axle and gear machining, and to be active in the processes of traditional technologies that customers will outsource, to focus on new challenges such as connectivity, autonomous driving and offering in-vehicle software-based solutions.

At the same time, it emphasises the innovation processes in these areas that, through their deployment in the coming years, will set the company apart from its competitors, to ensure that it is a winner in the process of taking advantage of the opportunity to consolidate the resulting market.

Collaborating on R&D projects, either individually or through consortia with customers, has been key in areas such as transitioning to electrical vehicles, circular economy, reducing vehicle weight, safety and Industry 4.0. These projects have generated significant partnerships with traditional customers, aligning the Group with market developments.

In addition, intensive commercial work has been carried out to bring new players into the sector, adapting the commercial and partnership approach to the particularities of these new participants. This effort has paid off, with mass production projects and developments underway with customers that have completely different business models to the traditional ones.

CIE Automotive is doubling down on its flexibility model, characterised by geographic, commercial and technological diversification, to adapt to current and future customer needs and the latest automotive trends. The diversification of the portfolio, where over 80% of the products are independent of the vehicle's propulsion system, provides a differential adaptation capacity compared to the competition.

CIE Automotive's business model, underpinned by its geographic diversity and decentralised management model, has proven resilient through a number of crises. The company gets its entire value chain involved, identifying opportunities with customers and taking those needs and opportunities to its suppliers.

Compliance with the IATF 16949 standard means compliance with consumer health and safety measures, although the company has no contact with the end users of the vehicles, as it is a B2B business. However, Original Equipment Manufacturer (OEM) customers issue CIE Automotive both order specifications and project and product requirements, to ensure that each component contributes to guaranteeing the safety of the vehicle they finally put on the market.

This regulation requires the use of key tools, called "core tools", which provide great value and differential product reliability. These tools are:

- **APQP (Advanced Product Quality Planning)**: it is a structured approach to planning and developing high-quality products from the initial stages of design and development, with an impact on warranty and durability. Ensures that the product meets customer needs from design including environmental, product safety, durability or end-of-life requirements. It detects possible problems before they reach production and of course the consumer. It helps to establish clear and robust specifications that prevent failures during the life of the product, ensuring the safety of the product.
- **FMEA (Failure, Mode and Effects Analysis):** it is a methodology for identifying and analysing possible failures in a design or process, evaluating their impact and defining preventive actions, with an impact on the guarantee and durability. It reduces the risk of product failures by addressing potential issues prior to manufacturing, ensuring compliance with requirements and expectations. Improves product reliability and robustness by ensuring key risks are properly managed.
- **PPAP (Production Part Approval Process):** it ensures that all specifications, tolerances and customer requirements are met before mass production begins, impacting warranty and durability. Validates that components consistently meet specifications. It ensures that manufacturing processes are able to produce safe, durable, and quality products in high volumes.
- **SPC (Statistical Process Control):** it is the use of statistical tools to monitor and control production processes, ensuring that they remain stable and within specifications with an impact on warranty and durability. Minimizes process variations, resulting in more consistent and long-lasting products. Detects deviations before they affect the quality of the final product.
- **MSA (Measurement Systems Analysis):** it is a process to evaluate the accuracy and repeatability of measurement systems used in production with an impact on warranty and durability. It ensures that measurement tools and equipment are accurate, preventing defects related to incorrect measurements. Improves reliability by ensuring products are properly inspected.

It is this transmission of requirements to suppliers, as is the case with CIE Automotive, that takes into account the requirements of repairability, separability and recyclability to improve the vehicle's end of life.

In the response to indicator *E5-2-19*, specific actions are mentioned both in terms of durability, repairability, reuse and end-of-life of vehicles, where the importance of virtual simulation and correlation through tests to close the validation circles of the components are mentioned. This is one of the key actions that are carried out in the different R&D centres that CIE Automotive has in the different geographies.

In addition, two European Union directives are mentioned, such as Directive 2000/53/CE on End-of-Life of Vehicles, which is also known as the ELV Directive, establishes measures to prevent and reduce the environmental impact of end-of-life vehicles. Key points include:

- **Design for disassembly and recycling:** manufacturers must consider, during design and production, the ease of disassembly, reuse and recovery of vehicles.
- **Limitation of hazardous substances:** the use of materials such as lead, mercury, cadmium and hexavalent chromium in the manufacture of vehicles is prohibited, with some specific exceptions.
- **Reuse and recycling objectives:** new vehicles must be reusable and/or recyclable by at least 85% of their weight, and reusable and/or recoverable by at least 95%.

For its part, Directive 2005/64/CE on the Approval of Vehicles in relation to their Reuse, Recycling and Recovery, which complements the previous one, focusing on the type-approval of motor vehicles in terms of their suitability for reuse, recycling and recovery, establishes requirements to ensure that vehicles comply with the minimum percentages of reuse and recycling mentioned above. Finally, recently have been promoted actions that are in line with the so-called "right to repair".

In 2025, as in 2024, there were no fines related to consumer safety, or fines related to marketing and labelling infringements.

Analysis of product risk in all regions

In 2023, the Group went a step further in its pursuit of customer satisfaction by conducting a product quality risk analysis in all regions to avoid potential recall notices to end-users to have their vehicles checked for part defects or problems and have them replaced by the OEM at no cost to the end-user. This analysis is part of a global programme in collaboration with the Company's insurance broker, which also analyses industrial and environmental risks. This brings together the risk analysis and risk mitigation expertise of both companies. As part of the programme, the projects are being ranked by region, which will be specially tracked. It has also conducted seminars on internal communications and best practices, and developed new incident escalation procedures to avoid not only any legal violations, but also any kind of customer dissatisfaction. The campaign focused on preventing potential defects, and included, among other issues, strengthening procedures and controls, the traceability of all products, the process of analysing the causes of potential defects, and constant communication with customers.

Safety

Product safety is at the forefront of CIE Automotive's development and innovation strategy. Several projects are currently underway to provide a more accurate prediction in the development phase of the behaviour of components and systems throughout their life cycle, considering various possible scenarios. Thus, the Company is improving performance from a noise and vibration point of view, taking into account the parts’ frequency characteristics to achieve a better prediction during the design phase. It is also optimising the design process for crashes by incorporating better modelling of the joints between components and the interactions between them, which provides greater vehicle safety in accidents and impacts.

Virtual validation by simulation is a key tool that, when combined with the final tests to have a closed design cycle and a correlation of results, generates important advantages for the final product and, therefore, for the consumer such as:

Accurate prediction of design performance: simulation, usually through finite element analysis (FEA), allows virtualization of real scenarios such as:

- Dynamic loads (impacts, collisions).
- Fatigue and long-term endurance.
- Mechanical deformations under stress.
- Thermal behaviour (in motors or brakes, for example).

This identifies weak points or areas of stress concentration that could fail and allows the design to be adjusted to minimize risks and improve resistance.

Design optimization: through FEA, structures, materials, and geometries can be optimized to:

- Reduce weight without compromising strength (very important in the automotive industry to comply with emissions regulations and improve energy efficiency).
- Improve the distribution of stresses to avoid deformations or failures.

This creates lighter and more durable products, aligned with the demands of the automotive sector.

Reduced costs and development times: traditionally, designs were validated through physical testing that involved manufacturing multiple prototypes. With the virtual validation cycle...

- Physical iterations are reduced, as problems can be detected and corrected early in the design stages.
- Accelerates product development by decreasing the time needed for testing.

This allows products to be brought to market faster and at a lower cost, without sacrificing quality or robustness.

Evaluation of multiple critical scenarios: in the development of vehicles and their components, it is essential to evaluate the performance of designs in extreme situations, such as:

- Simulation of impacts or collisions (crash).
- Impact of vibrations on components.
- Behaviour under extreme temperature variations.

This ensures that the product can withstand real and extreme conditions, improving its reliability and robustness.

Material validation: simulation helps simulate how different materials behave, including:

- Plastics and polymers.
- Aluminium and steel.
- Glass.

This makes it possible to select optimal materials that maximize the strength of the component and increase its durability, while reducing its weight with less use of raw materials and lower consumption in the phase of use.

Safety compliance: FEA simulation makes it easy to comply with strict automotive safety regulations (such as Euro NCAP, FMVSS, etc.). For example:

- Evaluation of deformations in the structure of the vehicle during an impact.
- Structural integrity analysis to protect occupants.

The benefit obtained is the improvement of the robustness of the design, ensuring that the vehicles are safe and comply with global regulations.

Integration with advanced design processes: in the automotive sector, simulation is combined with tools such as:

- Parametric design.
- Topological or topographic optimization.
- Digital twins.

All of this allows innovative designs to be iterated, solutions to be validated in real time and to ensure that they are robust from the conceptual stage.

Lastly, new requirements were included throughout the process, focused on achieving zero defects, to guarantee maximum product safety and customer satisfaction. In accordance with the methodologies implemented in the sector, all the possible ways a product risk may appear are identified at each step, from conception to the manufacturing phase, prioritising them and generating action plans to reduce their potential occurrence and severity, radically mitigating any potential failures in the products we deliver to our customers.

Several projects are underway to provide a more accurate prediction in the development phase of the behaviour of components and systems throughout their life cycle.

Eco-design

Introducing eco-design from the early stages of development helps minimise the impact of the products manufactured by CIE Automotive during the manufacturing process and also in the in-vehicle phase. In collaboration with its customers, the concepts of repairability, disassembly and recycling are introduced to improve the circularity of the end product, although these two points are the customer's final responsibility and CIE Automotive contributes its knowledge of materials and processes, as well as of certain safety products, acting as its safety manager for the information.

3.3.6 Targets MDR-T: Tracking effectiveness of policies and actions through targets

Despite the importance of this aspect, CIE Automotive does not currently have measurable, results-oriented and time-bound targets for end-user safety. However, the company monitors its policies through certificates (IATF 16949), complaint systems and the running of a product risk analysis in 2023 and 2024 in all the regions in which CIE Automotive operates. This analysis focused on preventing potential defects, which allowed for the strengthening of procedures and controls, and facilitated the traceability of all the products, a fact that has remained unchanged in 2025.

CIE Automotive remains committed to continuous improvement and is in the process of developing metrics and strategies to track the effectiveness of its actions in this area to meet the targets set in the future.

3.3.7 Metrics MDR-M: Metrics in relation to material sustainability matters

Metric	**IATF 16949**
Methodologies	The organisation will establish a documented process for conducting internal audits. This process should include the development and implementation of an internal audit programme covering the entire quality management system. This a programme should include internal system audits, production process audits and product audits. The frequency of the audits should be reviewed and, where appropriate, corrected when changes in the process occur. The effectiveness of the audit programme should also be analysed as part of the review by management.
Validation	The measurement of the metrics is validated by the external company TÜV Rheinland.
Labelling and definition	IATF 16949 is an international quality management system standard specifically designed for the automotive industry. This standard is based on ISO 9001 and is supplemented by additional requirements specific to the automotive sector. The IATF 16949 methodology focuses on continuous improvement, preventing defects, and reducing variations and waste in the automotive supply chain.
Material Impacts, Risks and Opportunities	Linked IROs are those obtained as a result of the dual materiality exercise for the themes: pollution (E2), water and marine resources (E3), circular economy (E5), own workforce (S1), value chain workers (S2) and business conduct (G1). These have been indicated throughout this report and detailed in the response to indicator *ESRS 2-SBM-3-48 h)*.

Metric	**ISO 14001**
Methodologies	ISO 14001 establishes a methodology based on the Plan-Do-Check-Act (PDCA) cycle. The procedure is to: 1. Establish the environmental objectives and processes necessary to achieve results consistent with its environmental policy. 2. Implement the processes as planned. 3. Monitor and measure the processes against the environmental policy, including its commitments, objectives and operational criteria, and report the results. 4. Take actions to continuously improve its environmental management system and its environmental performance.
Validation	The measurement of the metrics is validated by the external company TÜV Rheinland.
Labelling and definition	ISO 14001 is an international standard that specifies the requirements for an environmental management system and provides a framework that an organisation can follow to establish, implement, maintain and improve its environmental management system. The main objective of ISO 14001 is to help organisations to improve their environmental performance and to comply with their legal obligations and other obligations they have taken on.
Material Impacts, Risks and Opportunities	Linked IROs are those obtained as a result of the dual materiality exercise for the themes: pollution (E2),), water and marine resources (E3) and circular economy (E5). These have been indicated throughout this report and detailed in the response to indicator *ESRS 2-SBM-3-48 h).*

Governance Disclosures

4.1 Business conduct (ESRS G1)

4.1.1 Governance

4.1.1.1 ESRS 2 GOV-1 - The role of the administrative, management and supervisory bodies

ESRS 2 – GOV-1–5 a)	*When disclosing information about the role of the administrative, management and supervisory bodies, the undertaking shall cover the following aspects:* ***(a) the role of the administrative, management and supervisory bodies related to business conduct.***

General Shareholders' Meeting

The General Meeting is the highest representative body of the shareholders. Its functions are regulated by the Articles of Association and the Rules of Procedure of the General Meeting.

The General Shareholders' Meeting will decide on all matters that, in accordance with the law and the Company's articles of association, fall within its powers, and particularly those related to adopting the following types of resolutions:

i. Approving, if applicable, of the company's annual individual and consolidated financial statements, resolving on the on the distribution of profits or allocation of losses from each year, and discharging the management of the company.
ii. Approving its own rules of order and making any amendments to them.
iii. Appointing, re-electing and confirming board members or decisions to dismiss them, without prejudice to shareholders' powers of co-option and right of proportional representation under the applicable legislation.
iv. Appointing and re-electing the statutory auditors for the company and its group, and resolving to remove them in the cases provided for by law.
v. Resolving on capital increases and decreases, delegating the Board the power to set the date(s) of their implementation, as appropriate and in accordance with legal requirements. The Board may make use of the delegation fully or in part or even refrain from doing so in consideration of the conditions of the market, those of the company itself, or any other fact it considers justifies this decision, reporting on this at the first General Shareholders' Meeting held after the end of the period granted for making the capital increase or decrease.
vi. Amending the articles of association.
vii. Resolving to wind up the company and to carry out a global assignment of its assets and liabilities, mergers, demergers, and to move the company's registered offices abroad.
viii. Approving operations equivalent to the company's liquidation.
ix. Approving the remuneration policies for the members of the Company's Board. Approving remuneration systems for the Company's Board members that involve granting them shares or share options, or any remuneration system indexed to its share price.
x. Approving waivers of the board members' duty of loyalty and of their non-compete clauses, where the General Meeting is authorised by law to provide those waivers.
xi. Authorising share buybacks.
xii. Approving resolutions to wind up the company and appoint or remove insolvency practitioners; approving the final liquidation balance sheet.
xiii. Approving the Company's acquisition or disposal or transfer of essential assets to another company.
xiv. Approving transfers of the Company's prior core businesses to its subsidiaries, even where it would retain full control over them.
xv. Approving transactions that the company enters into with other companies in its group that are subject to conflicts of interest, when the business or transaction in question is, by its very nature, legally reserved to the competence of the General Meeting and, in any case, when the amount or value of the transaction or the total amount of the set of transactions envisaged in a framework agreement or contract exceeds 10% of the company's total assets.
xvi. Deciding on any matters submitted to it by the Board.

According to these Rules, to attend the General Meeting, shareholders must have their shares registered in their name at least five working days before the meeting is held. The members of the Board are obliged to attend the General Meeting according to article 10 of the General Meeting Rules. The required quorums are those established in section 194 Corporate Enterprises Act.

In 2025, the General Meeting was held on 7 May and was attended by 366 shareholders, in person or by proxy, representing 85.6% of its capital. To ensure the identity of the attendees and the correct exercise of their rights, in the days leading up to the meeting, the attendees registered and exercised their rights to request information and clarification, which were answered during the General Meeting.

Board

CIE Automotive's highest decision-making body is the Board. It is composed of 12 members, including its Chair, who does not perform executive duties. Of these 12 directors, 2 are executive, 3 are independent and 7 are shareholder-nominated directors.

There is a balanced ratio between independent and shareholder-nominated directors, taking into account the percentage of share capital held by free float (ordinary investors) and stable capital (held by significant shareholders). The independent directors hold the chair, and are in the majority on the Appointments and Remuneration Committee, the Audit and Compliance Committee and the Environmental, Social and Governance (ESG) Committee.

BOARD OF DIRECTORS AT 31 DECEMBER 2025

	Position	Type of director	Appointments and Remuneration Committee	Audit and Compliance Committee	ESG Committee
Antonio María Pradera Jáuregui	Chair	Shareholder-nominated			
Fermín del Río Sanz de Acedo	Deputy Chair	Executive			
Jesús María Herrera Barandiarán	CEO	Executive			
Arantza Estefanía Larrañaga	Member	Independent	Chair	Member	Member
María Eugenia Girón Dávila	Member	Independent	Member	Member	Chair
Elena María Orbegozo Laborde	Member	Independent	Member	Chair	Member
Íñigo Barea Egaña	Member	Shareholder-nominated			Member
Javier Fernández Alonso	Member	Shareholder-nominated		Member	
Francisco José Riberas Mera	Member	Shareholder-nominated	Member		
Juan María Riberas Mera	Member	Shareholder-nominated			
María Teresa Salegui Arbizu	Member	Shareholder-nominated		Member	Member
Abanti Sankaranarayanan	Member	Shareholder-nominated			
José Ramón Berecibar Mutiozabal	Secretary (non-board member)				

Functioning of the board

The functioning of the Board is regulated by the Articles of Association and the Board Rules, which state that:

1. The Board is competent to adopt resolutions on all matters not attributed by law or the Articles of Association to the General Meeting, with no substantial limits other than those established by the corporate purpose.

2. The Board is vested with the broadest powers and authority to manage and represent the Company.

3. Nevertheless, the Board will focus its activities on the supervision, organisation and strategic coordination of the CIE Automotive Group (the "Group"), defining, in particular, the level of risk it is willing to assume. Without prejudice to the powers that may not be delegated by law, the Board will entrust, in general, the duties of organisation and strategic coordination to the Chair of the Board, the Chief Executive Officer, the Executive Committee and senior management, who will disseminate, implement and supervise the general strategy and basic management guidelines established by the Board.

4. The Board will supervise the actions of the Chair of the Board, the Chief Executive Officer and the Executive Committee and senior management, and ensure the effectiveness of the system of checks and balances provided for in the applicable legislation.

5. Without prejudice to the powers delegated to it, the Board will, in addition to those specifically mentioned in the Rules, deal with matters of relevance to the Group within its powers relating to general duties of supervision, organisation and strategic coordination, and it undertakes in particular to exercise the following responsibilities directly:

i. To establish, within the legal limits, the Group's policies and strategies and the basic guidelines for its management, and to decide on matters of strategic relevance to the Group.
ii. To prepare the Annual Financial Statements, Directors Report and Proposed Allocation of Profits and Losses, as well as the consolidated Annual Financial Statements, Directors Report, the Statement of Non-financial Information, as well as the Financial Information that, as a listed company, the Company must periodically publish, ensuring that these documents provide a fair and accurate presentation of the equity, financial and non-financial position and results of the Company and its Group, in accordance with applicable legislation.
iii. To continuously update and improve the Company's corporate governance system within the framework of current legislation and the most widely recognised good corporate governance recommendations, adopting within its powers, or proposing to the General Shareholders' Meeting, any resolutions that may be necessary or advisable.
iv. Approving the strategic or business plan, the annual management objectives and budgets, the investment and financing policy, the corporate social responsibility policy, and the shareholder remuneration policy.
v. Establishing the risk control and management policy, including tax risks, and supervision of internal reporting and control systems.
vi. Determining the Company's tax strategy and approving investments or transactions that, due to their high amount or special characteristics, have a special tax risk.
vii. Defining the structure of the CIE Automotive Group. Approving the creation or acquisition of ownership interests in special purpose vehicles or entities resident in jurisdictions considered to be tax havens, and any other transactions or operations of a comparable nature whose complexity might impair the Group’s transparency.
viii. Appointing directors by co-option and proposing the appointment, confirmation, re-election or removal of directors to the General Meeting.
ix. Appointing and renewing the internal offices of the Board and the members and offices of the committees set up within the Board.
x. Proposing that the General Meeting approve the board member remuneration policy as established by law, and adopting decisions relating to board member remuneration within the framework of the Articles of Association and the provisions of that policy.
xi. Appointing the board members who are to perform executive duties and removing them, setting the remuneration to be paid to them for their executive duties and the other terms of their contracts, in accordance with the board member remuneration policy approved by the General Meeting, and ensuring diversity within the Board.
xii. Resolving on the appointment and removal of senior officers of the Company, and setting any compensation or severance pay if they are removed, all at the proposal of the Executive Committee or, if one has been appointed, of the CEO and, in all cases, following a report from the Appointments and Remuneration Committee.
xiii. Formulating the dividend policy and making the relevant proposals to the General Meeting on how to allocate profits and losses, and resolving to pay out interim dividends.
xiv. Approving the disposal of substantial assets of the Company and, in general, investments or transactions of all kinds that, due to their size or special characteristics, are of a strategic nature, including industrial, commercial or financial transactions of particular relevance or risk for CIE Automotive, establishing, where appropriate, the Company's position vis-à-vis the CIE Automotive Group companies in the above matters and transactions, without prejudice to the powers vested in the General Meeting.
xv. Deciding on the proposals submitted to it by the Executive Committee, the CEO or the Board’s committees.
xvi. Approving, following a report from the Audit and Compliance Committee, transactions that the Company or Group companies carry out with board members or with shareholders who own significant stake or are represented on the Board, as well as with persons related to them, under the terms established by law.
xvii. Approving the Company's annual Corporate Governance Report, as well as the annual Board Member Remuneration Report and any other reports deemed advisable by the Board to improve information for shareholders and investors or that are required by law. Calling General Meetings.
xviii. Carrying out the resolutions passed by the General Meeting and any other duties entrusted to it by the General Meeting.

xix. Proposing that the General Shareholders' Meeting make the amendments to the General Meeting Rules that the Board considers appropriate to improve how the Meeting operates and for shareholders to exercise their rights.

xx. Approving and amending the Board Rules, in accordance with them.

xxi. Defining the structure of the general powers of attorney for the Company and the companies in the CIE Automotive Group, which will be granted by the corresponding management bodies in each case.

xxii. Deciding to authorise or waive the obligations arising from the duty of loyalty provided by law (except when the decision on the authorisation or waiver is legally incumbent on the General Meeting).

xxiii. Deciding on any other matters under its purview that the Board considers to be of interest to the Company or that the Rules reserve to the full Board's decision.

In 2025, the Board met seven times, all of which were presided over by its Chair.

To make it more efficient, the work of the Board is organised into committees:

Audit and Compliance Committee

Composed of five members (three independent and two shareholder-nominated directors), this committee oversees the preparation and integrity of financial and non-financial information and ensures the independence and effectiveness of the internal audit function. Its responsibilities include reviewing the internal control systems and managing financial, including tax, and non-financial risks; hiring, appointing and replacing auditors; and receiving information from the external auditor, whose independence it must ensure.

In 2025, the committee met five times.

Appointments and Remuneration Committee

Composed of four members (three independent directors and one shareholder-nominated director), this committee's duties include formulating and reviewing the criteria for selecting candidates for the Board, evaluating Board members, proposing and monitoring the system and amount of annual remuneration of Board members and senior management, and overseeing the procedures for selecting new Board members.

In 2025, the committee met three times.

Environmental, Social, and Governance (ESG) Committee

Comprising five members (three independent directors and two shareholder-nominated directors), this committee’s work includes promoting CIE Automotive's corporate governance and ESG strategy.

In 2025, the committee met one time.

ESRS 2 – GOV-1–5 b)	*When disclosing information about the role of the administrative, management and supervisory bodies, the undertaking shall cover the following aspects*: ***(b) the expertise of the administrative, management and supervisory bodies on business conduct matters.***

ANTONIO MARÍA PRADERA JAUREGUI - CHAIR (SHAREHOLDER NOMINATED)

A graduate in Civil Engineering from the Polytechnic University of Madrid, in 1979 he began his career as a manager at Banco Bilbao, where he remained until 1985. In 1988 he was appointed Executive Director of Nerisa, where he worked until 1993, when he moved to SEAT as Director of Strategy. He played an important role in the creation of INSSEC in 1995, where he was the CEO until 2010. He has been Executive Chair of CIE Automotive since 2002, where he has held positions in Strategic Management and Financial Design, as well as in Global Dominion Access, S.A. He has served on the boards of Tubacex since May 2015 and Corporación Financiera Alba since June 2015. On 31 December 2017, he stepped down from his executive role at CIE Automotive, reinforcing the company's good governance practices. Since then, and with his position on the Board and specialised committees in several listed companies, he has significantly increased his experience managing and supervising business conduct, reinforced by the training given in the various companies.

FERMÍN DEL RÍO SANZ DE ACEDO - DEPUTY CHAIR (EXECUTIVE DIRECTOR)

Degree in Business Administration and Management (San Sebastian). He began his professional career as a tax advisor in 1975 and founded Norgestión (a consultancy firm specialising in M&A, tax law and finance). He worked there until 2008. He was in charge of the tax section of the Guipúzcoa Professionals Association (ADEGI) and served on the Tax Committee of the Professionals Confederation of the Basque Country (CONFEBASK). He acted as chair of Autometal S.A., and sat on the boards of multiple companies in various production sectors, such as Fegemu S.A., Norfiser S.A., and Global Dominion Access S.A. He is currently on the boards of Alai Extrusión, S.A., Basquevolt, Marcos Larrañaga y Cia, S.A., and Viveros San Antón, S.A.5.

JESÚS MARÍA HERRERA BARANDIARAN - CEO (EXECUTIVE)

A graduate in Economics and Business Studies from the University of the Basque Country, with a Master's Degree in Internationalisation from Euroforum. He joined CIE Automotive in 1991 as CFO and HR Director at CIE Orbelan. In 1995 he was appointed deputy managing director and in 1998 he took over the general management of the company. In 2000, he was put in charge of CIE Brazil, as well as CIE Plasfil in 2002. That year he was appointed worldwide director of CIE Plastics until 2005, when he took over the general management of CIE America. He has been CEO of Autometal S.A., since 2010, and in 2011 he was appointed CEO of the entire Group, although a year later he took over as General Manager of CIE Automotive. In 2013, the Board appointed him CEO of CIE Automotive. He also serves on the board of Global Dominion Access, S.A.

ARANTZA ESTEFANÍA LARRAÑAGA - COORDINATING DIRECTOR (INDEPENDENT)

A graduate in Law with Honours and an Extraordinary End of Degree Award from the University of Deusto. From 2000 to 2019, she was Managing Partner of the Bilbao office of Uría Menéndez Abogados S.L.P., sitting on the firm's Board, Professional Practice Management Committee, and Criminal Risk Prevention Committee. She has been an independent director at Repsol, S.A., since 31 May 2019, a member of its Sustainability Committee since that date, and a member of its Remuneration Committee since 24 November 2021, serving on its Appointments Committee until that date. Since July 2021 she has been a Director and Secretary of the Board of its subsidiaries, Repsol Industrial Transformation, S.L.U., and Repsol Customer Centric, S.L. Since 8 May 2020 she has been an independent Director of Global Dominion Access, S.A., having chaired its Audit Committee until 12 May 2021. She currently serves as a member of the Audit and Sustainability Committees. Since May 2019, she has been part of the group of experts of the Economic and Social Council of the Basque Country, and since December 2019 she has served as chair of the Council's Economic Committee. She is Secretary of the Board of Bilbao Exhibition Centre S.A.

MARÍA EUGENIA GIRÓN DÁVILA - DIRECTOR (INDEPENDENT)

Holder of a degree in Industrial Engineering from ICAI and an MBA from Harvard Business School. She has been a Manager at Loewe and CEO of Carrera y Carrera after leading the "Management Buy-In" process. She is Vice Chair of the International Board of Trustees of Oceana and a member of the Board of Trustees of the Royal Tapestry Factory. She is a jury member of the European Commission's European Innovation Council Accelerator and the Green Deal. She co-founded Women Corporate Directors in Spain and is a member of the Board of the Institute of Board Members and Directors. She is also currently an independent director of Corporación Financiera Alba and Birks Group (NYSE) and a member of the advisory board of Delaviuda.

ELENA MARÍA ORBEGOZO LABORDE - DIRECTOR (INDEPENDENT)

Holder of a degree in Mathematical Sciences. She has spent part of his professional career in a multinational technology services company, focused on Information Management and Big Data. Elena María Orbegozo Laborde is a forward-thinking account manager with a proven track record of achievement in the IT sector over a career spanning over 30 years. She is an ambitious and dynamic manager of changes, dedicated to continuous business improvement, and focused on boosting revenues and streamlining business operations. She is dedicated to optimising profits.

ÍÑIGO BAREA EGAÑA - DIRECTOR (SHAREHOLDER NOMINATED)

With a degree in Aeronautical Engineering from the Polytechnic University of Madrid and the École Nationale Supérieure de l'Aéronautique et de l'Espace and an MBA from IESE Business School, he began his professional career as an engineer specialising in propulsion systems integration at Airbus. At the strategic consultancy A.T. Kearney, he worked on various international projects with a focus on improving operational efficiency. In 2020 he joined the technology company Just Eat, where he currently holds the position of general manager of Just Eat Spain.

JAVIER FERNÁNDEZ ALONSO - DIRECTOR (SHAREHOLDER NOMINATED)

Holder of an MBA with Honours from the University of Deusto, specialising in Finance. In 2000, he started his career in investment banking and M&A at Goldman Sachs in London and then joined ABN AMRO in Madrid in 2002. In 2006, he joined the Investment Department of Corporación Financiera Alba and was appointed Deputy Chief Investment Officer in 2007, Chief Investment Officer in 2012, and Managing Director in 2020, a position he currently holds. He currently represents Alba on the Boards of CIE Automotive, Ebro Foods, Profand Fishing Holding, Viscofan, and Naturgy's SPVs Rioja and Rioja Acquisition vehicles. He has previously sat on the Boards of, among others, Acerinox, ACS, Dragados, ACS Servicios y Concesiones, Euskaltel, Parques Reunidos, and Clínica Baviera. In addition, he also serves on the Board of the Group's private equity vehicle and is a member of the Investment Committee of two funds managed by Artá Capital.

FRANCISCO JOSÉ RIBERAS MERA - DIRECTOR (SHAREHOLDER NOMINATED)

Francisco J. Riberas was born in Madrid on 1 June 1964. He holds degrees in Law (1987) and in Economics and Business Studies (1988) from the Universidad Pontificia de Comillas (ICADE E-3), Madrid. He began his professional career by holding various positions in the Gonvarri Group, as Director of Corporate Development and later as its CEO. In 1997 he created Gestamp and since then he has been its CEO, eventually forming what is today the Gestamp Group. He serves on the boards of Telefónica, CIE Automotive and Wallbox. He also sits on the boards of other Gestamp companies and companies in the Acek family holding company, including companies belonging to the Gonvarri, Acek Energías Renovables and Inmobiliaria Acek groups. In addition, Francisco J. Riberas is the chair of the Spanish Association of Automotive Suppliers (SERNAUTO), and the Spain-China Council Foundation.

JUAN MARÍA RIBERAS MERA - DIRECTOR (SHAREHOLDER NOMINATED)

Jon Riberas was born in Madrid in 1968. He holds degrees in Law (1991) and in Economics and Business Studies (1992) from the Universidad Pontificia de Comillas (ICADE E-3). In 1992 he began his professional career in the Gonvarri Group in the Business Development area, later taking on the role of CEO. In 2005 he helped found ACEK Renewables, an operator in the renewable energy sector with a unique business model. In 2010 he was appointed Executive Chair of Gonvarri Industries and Co-Chair of Corporación ACEK, the family holding company. He currently holds the positions of Co-Chair of the family holding company, Executive Chair of Gonvarri Industries, Executive Chair of GRI Renewable Industries, and Deputy-Chair and member of the Board of Gestamp, in addition to serving on the Boards of CIE Automotive and Global Dominion.

MARÍA TERESA SALEGUI ARBIZU - DIRECTOR (SHAREHOLDER NOMINATED)

Holder of a degree in Economics and Business Studies from the University of Deusto. She began her professional career in the transport company La Guipuzcoana (1988-2002), where she reached the position of general manager, a position she also held at DHL Express Iberia (2002-04). She is currently the Chair of Addvalia Capital and Perth Espacio y Orden, and serves on the Board of Baztango.

ABANTI SANKARANARAYANAN - DIRECTOR (SHAREHOLDER NOMINATED)

Abanti Sankaranarayanan, an Indian national, leads the Public Affairs (India and International), Sustainability, and Risk functions in the Mahindra & Mahindra Ltd. Group, and is also a member of the Executive Committee. She also serves on the Executive Council of the Society of Indian Automobile Manufacturers (SIAM) and is Chair of the IIC Transport Working Group, in addition to co-chairing the Environment and Climate Change Committee of the Federation of Indian Chambers of Commerce and Industry for 2024. Prior to joining Mahindra, she was Head of Strategy and Corporate Affairs at Diageo India and a member of its Executive Committee, as well as a member of TATA Administrative Services (TAS), responsible for various brands within the Tata Group. Abanti's contribution to business has been recognised by Fortune India (The Most Powerful Women in Business; 2012, 2014, 2015 and 2016), IMPACT (50 Most Influential Women in Media, Marketing and Advertising; 2014, 2015, 2016 and 2017), India Today (India's 25 Most Influential Women, 2013) and Fast Company, New York (100 Most Creative People in Business, 2012). Abanti holds a degree in Economics from St. Stephen's College, Delhi and an MBA from the Indian Institute of Management (IIM), Ahmedabad.

4.1.2 Management of impacts, risks and opportunities

4.1.2.1 DR related to ESRS 2 IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities

ESRS 2 IRO-1–6	*When describing the process to identify material impacts, risks and opportunities in relation to business conduct matters, the undertaking shall disclose all relevant criteria used in the process, including location, activity, sector and the structure of the transaction.*

The general process followed to identify and assess Impacts, Risks and Opportunities (IROs) related to business conduct matters are described under ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities.

CIE Automotive has its own corporate governance regulatory framework [Articles of Association, Rules of Order of the Governing Bodies, Professional Code of Conduct, Internal Code of Conduct for the Securities Markets and the Criminal Risk Prevention Manual], which were used to identify a series of real positive impacts on its corporate culture, promoting transparency and integrity.

In addition, the company also generates a positive impact, through supplier relations, through the policies and procedures it has in place.

On the other hand, real negative impacts and risks were identified associated with corruption and bribery, and non-compliance with the Whistleblowing Channel, and risks associated with security of customer data.

Economic opportunities were also detected linked to promoting a corporate culture that includes respect for human rights, relations with suppliers based on transparency and fair and non-discriminatory treatment, and collaboration with public administrations.

ESRS G1 - Business Conduct - Impacts, Risks and Opportunities (IROs)

+: positive impact // -: negative impact // R: risk // O: opportunity

Subtopics	IROs
Corporate culture	(+ and R) High security of customer data, including information relating to part moulds and prototypes
	(+) Fostering a corporate culture of high ethical standards, transparency and integrity.
	(+ and O) Promotion of a corporate culture that includes respect for human rights as a pillar through awareness-raising and training of professionals.
Corruption and bribery	(- and R) Existence of cases of corruption, fraud, bribery and money laundering, among other illicit practices.
	(-) Ineffectiveness of the Whistleblowing Channel for detecting and punishing illicit practices.
	(- and R) Breaches of the principles of the Professional Code of Conduct and loss of trust among the company's stakeholders.
Management of relationships with suppliers, including payment practices	(+ and O) Relations with suppliers based on objectivity, transparency and fair and non-discriminatory treatment.
	(+ and O) Helping suppliers develop their processes by partnering with them.
Protection of whistleblowers	(-) Economic or social duress on employees of the company or its Value Chain, placed on them by powerful figures in the company because they filed complaints.
Political participation and lobbying	(O) Collaboration with Public Administrations as a key Stakeholder Group to achieve improved services for communities.

4.1.2.2 DR G1-1 - Corporate culture and business conduct policies and corporate culture

MDR–P G1-1-7	*The undertaking shall disclose its policies with respect to business conduct matters and how it fosters its corporate culture.*

Title	**Professional Code of Conduct**
Description	CIE Automotive conducts its business and professional activities in accordance with a Professional Code of Conduct, which serves as an ethical guide at all levels of the organisation.
Objective	To provide ethical guidelines and principles of conduct for all directors, managers, employees and workers of all the companies that comprise the Group, determining the values and commitments that must govern their work activities within the Group. It was drawn up with the aim of meeting the demands of both stakeholders and society in general, and thus continue to earn the commitment and trust they have placed in the Group.
Material Impacts, Risks and Opportunities	IROs related to the subtopics of corporate culture, corruption and bribery, supplier relationship management, including payment practices, political participation and lobbying, and whistleblower protection.
Scope of the policy	This Code of Conduct is binding for all members of the Group without exception. All employees have the obligation to understand and comply with these rules of conduct, and in no jurisdiction will ignorance of the law exempt them from compliance. CIE Automotive will also encourage its business partners or business associates (joint ventures, temporary joint ventures, suppliers, customers, contractors and collaborating companies) to act in accordance with this Code and to apply ethical programmes that are consistent with its standards. The Group will take appropriate action if it becomes clear that they have not complied with their policies or contractual obligations.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	The Professional Code of Conduct applies globally.
Value Chain	CIE Automotive will encourage its Value Chain to act in accordance with this Professional Code of Conduct and to implement ethical programmes that are consistent with its standards. The Group will take appropriate action if it becomes clear that they have not complied with their policies or contractual obligations.
Body responsible for implementation	CIE Automotive's Board, through its Audit Committee, is ultimately responsible for the existence and application of the Professional Code of Conduct.
Availability	Public document posted on the corporate website and on the Group's intranet.

Policy	**Anti-Corruption and Fraud Policy**
Description	This policy was prepared on the basis of the main sources of relevant legislation and best practices on the subject of combating corruption and fraud. There is currently an exhaustive set of pertinent laws, legislation, and international agreements, and those used for reference here include the United Nations (UN) Convention Against Corruption; the UN Anti-Corruption Ethics and Compliance Programme for Business, the Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the United States Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and Spain's Criminal Code [*Código Penal*], along with other international sources.
Objective	To define the rules of conduct related to preventing corruption, in line with the principles and rules of conduct that CIE Automotive has documented in its Professional Code of Conduct.
Material Impacts, Risks and Opportunities	IROs related to the subtopics of corruption and bribery, whistleblower protection and corporate culture.
Scope of the policy	Compliance with this Policy is compulsory for all members of the Group, without exception. In addition, the rules and principles from this policy must be observed by all external parties that act for or on behalf of CIE Automotive, or that participate, collaborate, or act as intermediaries in relation to its operations or business affairs.
Stakeholders concerned	All CIE Automotive stakeholders.

Geographical regions	This policy applies globally.
Value Chain	In line with the general principle of zero tolerance for any form of corruption, CIE Automotive does not allow acceptance of any gifts, favours, or unpaid services from external parties, whether offered in the form of cash or in kind, or as any other object of value, except for those that have only a symbolic value and are not intended to influence the objectivity that must be maintained during all of its activities.
Body responsible for implementation	CIE Automotive's Board, through its Audit Committee, is ultimately responsible for the existence and application of this policy.
Availability	Public document posted on the Group's corporate website.

Policy	**Human Rights Policy**
Description	This policy formalises the company's commitment in this area, in a manner consistent with the Professional Code of Conduct and the ten principles of the United Nations Global Compact (https://unglobalcompact.org/).
Objective	To minimise the risk of human rights violations, by establishing principles and guidelines for due diligence in relation to those rights, so that this Policy can be used to identify, prevent, mitigate, and remedy all potential negative impacts
Material Impacts, Risks and Opportunities	IROs related to the subtopics of corporate culture, anti-corruption and fraud and whistleblower protection.
Scope of the policy	Compliance with this Policy is compulsory for all members of the Group, without exception. In addition, the rules and principles from this policy must be observed by all external parties that act for or on behalf of CIE Automotive, or that participate, collaborate, or act as intermediaries in relation to its operations or business affairs.
Stakeholders concerned	All CIE Automotive stakeholders.
Geographical regions	CIE Automotive's Human Rights Policy applies to all of the Group's activities, regardless of the worldwide location where they are being performed.
Value Chain	CIE Automotive must distribute its commitment to human rights across its entire value chain. Likewise, CIE Automotive is committed to disseminating this policy to its suppliers, contractors, collaborating companies and customers, promoting and incentivising the various components of the value chain to implement their own policy in relation to this matter and, if they do not have one, to adhere to the Group's policy.
Body responsible for implementation	The Board, through its ESG Committee, is ultimately responsible for the existence and application of this policy.
Availability	Public document posted on the Group's corporate website.

G1-1-9 *AR 1*	*The disclosures required under paragraph 7 shall include how the undertaking establishes, develops, promotes and evaluates its corporate culture.*

The main rules governing corporate culture are the Articles of Association, the Rules of the Governing Bodies, the Professional Code of Conduct, the Internal Code of Conduct for Securities Markets and the Criminal Risk Prevention Manual. These texts are complemented and developed by all the corporate policies enacted by the Board.

CIE Automotive periodically reviews these standards to adapt them to the requirements and recommendations of the CNMV, prevailing legislation and the highest standards of good governance. In 2023, it amended the Whistleblowing Channel Rules to facilitate the reporting of irregularities and ensure whistleblower confidentiality, in line with the latest legislation, and it updated its Board Member Remuneration Policy to adapt it to market developments.

Likewise, in February 2024, a project was completed to comply with all the parameters proposed by Transparency International Spain (a top-level benchmark in the field) in the areas of regulatory compliance, anti-corruption and good governance. This included reviewing the following areas. In 2025, its global deployment and implementation has continued, as detailed below:

- The Internal Whistleblowing System and Channel at a global level, in accordance with the Whistleblower Protection Act, and with the aim of establishing a common body for other companies in the Group, without prejudice to the establishment of specifics in an annex.

- The criminal risk map and the criminal risk prevention, fraud and anti-corruption policies.
- Establishing new basic guidelines for defence of competition.
- Identifying recommendations of various kinds in relation to preventing various types of harassment.
- Reviewing and, where necessary, improving the good governance and ESG policies.

Both the legal framework defined by the Group and the Annual Corporate Governance Report and the Annual Board Member Remuneration Report are available on the corporate website, following the technical and legal specifications established by the National Securities Market Commission in its Circular 3/2015 of 23 June.

In parallel, the Group reviewed the controls of its risk management system, expanding its risk map with the collaboration of a larger number of people, and, as it does every year, it deployed its criminal map in all countries where the company has production centres.

Training on the Professional Code of Conduct

As part of training the entire company on the changes in the Professional Code of Conduct, and on several of the corporate policies that derive from it, within the recurrent training on ethics and compliance, the company provided global training in two modalities: an online version, for those who have a corporate email, and an offline version, for those people who do not require a corporate email in their day-to-day work.

By the end of 2025, more than 95% of companies had launched global training in this area, thus meeting the target set out in the ESG Strategic Plan.

Participation in Forética

CIE Automotive is a member of the Transparency, Good Governance and Integrity Cluster, a business platform coordinated by Forética in Spain, which aims to promote a sustainable corporate governance model and address various issues related to ESG management, disseminating the main trends in this area and serving as a meeting point where companies can engage in dialogue and exchange knowledge with each other.

The cluster's activity in 2025 focused on working on three key issues due to their topicality and impact on organisations: the internal governance of organisations and specifically on Boards of Directors, focusing on variable remuneration and incentives for directors linked to Environmental, Social and Governance (ESG) objectives; the new reporting framework set by the European Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS); and the EU Taxonomy, following the approval of the remaining 4 of the 6 environmental objectives.

G1-1-10 a)	*The disclosures in paragraph 7 shall cover the following aspects related to the undertaking's policies on business conduct matters:* ***(a) a description of the mechanisms for identifying, reporting and investigating concerns about unlawful behaviour or behaviour in contradiction of its code of conduct or similar internal rules; and whether it accommodates reporting from internal and/or external stakeholders.***

As part of its firm commitment to ethical conduct, and as an essential element of its work to eradicate corruption, CIE Automotive has implemented and maintain a comprehensive set of ethics tools. This includes an Internal Whistleblowing System that is in full compliance with EU legislation, the relevant national laws, and the highest standards existing on the subject. This includes, among other elements, an internal reporting channel known as the Whistleblowing Channel, which is made available through the corresponding online platform. There is also a set of Whistleblowing Channel Rules that have been implemented and duly distributed. These tools play a fundamental role in promoting an organisational culture based on ethics, integrity, and transparency.

The Whistleblowing Channel, which is available via an online platform accessible through the corporate website, has been designed to serve as a means of communicating information about potential legal infringements (including infringements of EU law, criminal offences, administrative infractions, occupational health and safety violations, and possible non-compliances with the Professional Code of Conduct and all the other internal rules that are part of its Compliance Management System). The Whistleblowing Channel offers various ways of communicating the information being reported, and whistleblowers may select any of those options.

In 2023, CIE Automotive strengthened its Whistleblowing Channel by installing a digital platform on its corporate website, which ensures the security of the whistleblowing process and simplifies how the Company manages each case. It is a cutting-edge and intuitive system in all the languages of the countries where the company is present, which offers the possibility of opening a secure mailbox where users can submit reports and provide complementary information in various formats (in writing, voice messages, etc.). All the information is confidential and, if the whistleblower wishes, anonymous.

The new digital channel has been implemented in accordance with the requirements of the Whistleblower Protection Act and in line with international legal requirements, which derive from Directive (EU) 2019/1937 of the European Parliament and of the Council.

Compliance with this new law has led to the modification of the Whistleblowing Channel Rules, which set out the general principles of the system and how it is managed.

Whistleblowing Channel Rules:

The Whistleblowing Channel may be used by anyone who is part of CIE Automotive, i.e., all persons professionally related to the company (employees, regardless of their status, including trainees, whether due to being shareholders, executives or members of the Board, as well as applicants in hiring processes, interns, trainees, retirees, etc.) may submit information on alleged breaches or raise queries through the internal channel, either directly or through counsel.

It may also be used by external third parties, freelancers, suppliers, contractors and subcontractors (and their employees), provided that they comply with the established requirements and procedures.

After reporting the information on a suspected breach, a message will be automatically generated to the System Administrator to notify them of the receipt of the information.

Similarly, the reporting person will automatically receive an acknowledgement of receipt through the platform. This acknowledgement will notify receipt of the communication, provide the assigned case number and ensure that personal data are processed in full compliance with the relevant regulations. In addition, the informant will be informed of the obligations and commitments regarding confidentiality, protection of personal data and guarantee of rights, which must be respected both during the processing of the file and after its closure, as the case may be.

The filed report will be recorded in the platform and its content will be stored in a secure, restricted-access database where all the reports received will be recorded. If multiple reports are received concerning the same event or events that are wholly or significantly related, the various cases may be joined together.

The System Manager will (with the support of the Compliance Body) carry out a preliminary assessment of the report as soon as possible, in particular on the sufficiency and plausibility of the report and whether it complies with the other requirements under these Rules.

The investigation phase will be opened when, after a preliminary analysis, the System Manager has decided to accept the report filed through the Channel (online platform).

Depending on the scope, subject matter, extent and/or persons allegedly involved, the investigation may be carried out directly by the System Manager (without prejudice to any consultations or support that may be required from other departments or external advisors for its full substantiation) or may be referred to other specific departments to carry out the investigation (Investigator), especially Internal Audit.

However, the System Manager will supervise the investigation of reports that they do not directly investigate, and will at all times provide support, assistance and advisory for such investigations.

The person designated to carry out the investigation may, subject to the approval of the Whistleblowing System Manager, engage external auditors or consultants to assist in the investigation and the analysis of the results.

The Investigating Person in charge of the investigation will be authorised to interact with the informant in order to obtain additional details to facilitate the proper and timely conduct of the investigation. This will include requesting additional information or evidence related to the reported facts.

G1-1-10 c)	*The disclosures in paragraph 7 shall cover the following aspects related to the undertaking's policies on business conduct matters: (c) how the undertaking protects whistleblowers, including:* *i. Details on the establishment of internal whistleblower reporting channels, including whether the undertaking provides for information and training to its own workers and information about the designation and training of staff receiving reports; and* *ii. Measures to protect against retaliation its own workers who are whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937 of the European Parliament and of the Council;*

Training on the Professional Code of Conduct

As part of training the entire company on the changes in the Professional Code of Conduct, and on several of the corporate policies that derive from it, within the recurrent training on ethics and compliance, the company provided global training in two modalities: an online version, for those who have a corporate email, and an offline version, for those people who do not require a corporate email in their day-to-day work.

By the end of 2025, more than 95% of companies had launched global training in this area, thus meeting the target set out in the ESG Strategic Plan.

This training covers the operation and use of the mechanisms that the company has put in place for reporting any breaches of the guidelines set out in the Code of Professional Conduct.

As stated in the Internal Whistleblowing System Policy and the Whistleblowing Channel Rules, the Manager of the Internal Whistleblowing System (a function assigned to the Group's Chief Compliance Officer) will be the one in charge of managing the Internal Whistleblowing System and will act with full independence and autonomy, with the necessary personal and material resources to carry out their duties. For any reports that are filed, depending on the scope, subject matter, extent and/or persons allegedly involved, the investigation may be carried out directly by the System Manager (without prejudice to any consultations or support that may be required from other departments or external advisors for its full substantiation) or may be referred to other specific departments to carry out the investigation (Investigator), especially Internal Audit. However, the System Manager will supervise the investigation of reports that they do not directly investigate, and will at all times provide support, assistance and advisory for such investigations.

When a report so requires, everyone involved in the internal investigation process must be trained in the Whistleblowing Channel Rules and the procedure to be followed.

CIE Automotive is required to train the Chief Compliance Officer on how the Whistleblowing Channel works, which is the main channel of the Internal Whistleblowing System. Similarly, it is the Chief Compliance Officer who must train and inform everyone who is directly or indirectly involved in managing the Whistleblowing Channel.

The basic principles on which the Internal Whistleblowing System is based are: communication, anonymous reporting, truthfulness, presumption of innocence, confidentiality, effective protection, proportionality, impartiality, fairness, the right to a hearing, equal opportunities, data protection and non-retaliation. For further details, the Rules can be found on the Group's corporate website.

As indicated in both the Professional Code of Conduct and the Rules themselves, any kind of direct or indirect retaliation against those who have made due use of the Whistleblowing Channel, in good faith, is prohibited, and attempted or consummated retaliation against those who have reported in good faith will be definitively sanctioned.

The prohibition against retaliation will not prevent the adoption of appropriate disciplinary measures when the internal investigation determines that the information communicated through the internal channel is false and that the whistleblower has made the report knowing it to be false and acting in bad faith.

Whistleblowing Channel Rules

Security and confidentiality measures

CIE Automotive will ensure that all necessary technical and organisational measures are taken to preserve the security of the data collected to protect them from unauthorised disclosure or access.

In this respect, whistleblowers may decide whether they want to identify themselves when making a report. Anonymous complaints are therefore admissible. In any case, maximum confidentiality will be guaranteed regarding the identity of the informants who initially or subsequently wish to identify themselves.

To this end, CIE Automotive has adopted appropriate measures to guarantee the confidentiality of all the data and will ensure that the data relating to the identity of the whistleblower is not disclosed to the accused during the investigation, while respecting the person's fundamental rights, without prejudice to any action that may be taken by the competent judicial authorities. The identity of the whistleblower may only be disclosed to the administrative and judicial authorities, where legally appropriate, for the proper handling of any administrative or judicial proceedings that may arise from the complaint lodged.

In this regard, the identity of the reporting person will only be known to the persons in charge of managing the System and investigating the report, as well as to the areas that are strictly necessary for the investigation of the facts and resolution of the reports made. Lastly, persons who, by reason of their duties, have knowledge of the complaints made, are personally bound to keep all information to which they have access secret.

Avoiding discriminatory practices

Since 2020, CIE Automotive has had a Harassment Prevention and Treatment Protocol in place, which is mandatory at all Group facilities. This protocol addresses the prevention of mobbing, sexual harassment, discriminatory harassment (on grounds of sex, gender or other discriminatory grounds), acts of violence in the workplace and cyberbullying.

It includes a number of preventive measures, such as zero tolerance of harassment, making all employees responsible for monitoring conduct at work, and implementing communication programmes. The full protocol is available on the corporate website.

Number of complaints received in 2025

In 2025, 163 complaints were received through the Whistleblowing Channel, 72 more than in 2024, although a total of 102 (63% of the total) of these reports were closed as no evidence was found to justify them during the internal investigations carried out.

The complaints received in 2025 related to:

- Bullying: 89 cases of inappropriate behaviour by senior managers towards permanent staff. Of the total 89 cases reported, 62 (70% of the total) were closed without further action, as the internal investigation found no evidence to justify them.
- Human resource management in the day-to-day work planning in the factories 19 complaints, of which nine (47% of the total) were dismissed without further action, as the internal investigation found no evidence to justify them.
- Bribery and corruption: 16 cases reported for malpractice at various plants by individuals in the Purchasing and Human Resources departments, who breached CIE Automotive's general purchasing conditions for their own benefit. Although the amounts involved were not significant, nor did the value of the contracts with the related suppliers materially affect the financial results of the plants involved, their existence affected the group's image and ethical commitment. It should be noted that eight of the reported cases (50% of the total) were dismissed because the internal investigation did not find sufficient evidence to justify the complaint.
- Discrimination: 13 cases reported in response to discriminatory situations, of which 100% were closed after internal investigations failed to find sufficient evidence to justify the complaints.
- Business management: 12 cases related to the company's operations with its stakeholders. Of this total, five were closed (42% of the total) without any action being taken, as the internal investigation did not find sufficient evidence to justify them.
- Sexual harassment: six cases of inappropriate behaviour by senior managers towards staff, of which one case was closed as the internal investigation did not find sufficient evidence to justify it.
- Breach of the Code of Professional Conduct: a total of four cases of breach of the rules of conduct by some employees. In this case too, two of the reported cases (50% of the total) were dismissed due to lack of evidence.
- Conflict of interest: three complaints received, of which two were dismissed (66% of the total) due to lack of evidence to justify them.
- Fraud: one case reported for the use of company transport services for personal gain.

In 2024, by contrast, the complaints related to human resources management in day-to-day factory work planning (40), workplace harassment (26), business management (10), bribery and corruption (four), fraud (four), non-compliance with the guidelines of the Code of Professional Conduct (three), sexual harassment (two), discrimination (one) and conflict of interest (one).

In all the cases reported in 2025 and communicated to the ESG Committee, the appropriate actions were taken to study, monitor and resolve or close the cases.

The actions may include specific training plans, conciliatory measures, disciplinary proceedings and also dismissal. In the latter case, 14 persons were dismissed due to the actions taken following the relevant internal investigations: nine persons related to cases of bullying, three in cases of sexual harassment, one person related to corruption cases, and one in relation to a report of a conflict of interest.

At the close of the 2025 financial year, 19 complaints remain pending as the required investigation is ongoing,

In 2024, 10 individuals were dismissed as a result of the actions taken: three individuals related to cases of moral harassment, two with complaints of breach of the Code of Professional Conduct, two with cases of sexual harassment, two with cases of personnel management, and one individual related to a complaint of conflict of interest.

In addition, employees from the Management Team and the relevant HR departments mediated to resolve reported cases of bullying, sexual harassment and discrimination, and to prevent their recurrence, by further educating employees on the company's values and the guidelines of the Professional Code of Conduct. External professionals also helped carry out detailed investigations in those cases where required.

G1-1-10 e)	*The disclosures in paragraph 7 shall cover the following aspects related to the undertaking's policies on business conduct matters:* ***(e) beyond the procedures to follow-up on reports by whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937, whether the undertaking has procedures to investigate business conduct incidents, including incidents of corruption and bribery, promptly, independently and objectively.***

As set out in the Whistleblowing Channel Regulations, CIE Automotive has procedures to investigate business conduct incidents, including incidents of corruption and bribery, promptly, independently and objectively.

Internal investigation procedure

1. Reception and preliminary analysis of the report

After reporting the information on a suspected breach, a message will be automatically generated to the Manager of the Whistleblowing System (the "System") to notify them of the receipt of the information. Similarly, the reporting person will automatically receive an acknowledgement of receipt through the platform. This acknowledgement will notify receipt of the communication, provide the assigned case number and ensure that personal data are processed in full compliance with the relevant regulations. In addition, the informant will be informed of the obligations and commitments regarding confidentiality, protection of personal data and guarantee of rights, which must be respected both during the processing of the file and after its closure, as the case may be. The filed report will be recorded in the platform and its content will be stored in a secure, restricted-access database where all the reports received will be recorded. If multiple reports are received concerning the same event or events that are wholly or significantly related, the various cases may be joined together.

If the information received is considered to be totally or partially confusing or insufficient, the relevant amplifications or clarifications may be requested through the platform. The System Manager will (with the support of the Compliance Body) carry out a preliminary assessment of the report as soon as possible, in particular on the sufficiency and plausibility of the report and whether it complies with the other requirements under these Rules.

2. Decision on admissibility or inadmissibility

After the preliminary analysis, the System Manager will make one of the following decisions, which will be recorded in the report:
a. To admit the report for processing and initiate the investigation in accordance with the provisions set out below.
b. Not to admit the report in the following cases:

- If the facts reported do not constitute an Infringement as set out in these Rules.
- If no evidence was produced that could at least minimally corroborate the facts.
- If the facts reported are implausible or manifestly unfounded.
- If there are reasonable grounds to believe that the information, evidence or proof provided was obtained unlawfully.
- If the information communicated is already in the public domain or the System Manager already knew them and did not consider them to constitute an infringement (unless there are relevant new circumstances, evidence or proof to justify an investigation).

Both a decision not to admit the reported information and a decision to admit it for processing will be communicated to the whistleblower through the Platform (or by email if the whistleblower used the email that was in place before the platform). The whistleblower will be able to follow the progress of the case if they wish to do so by using the unique code provided (case number) and their password in the platform messages.

3. Investigation

3.1. Opened

The investigation phase will be opened when, after a preliminary analysis, the System Manager has decided to accept the report filed through the Whistleblowing Channel (online platform). Likewise, the Manager may also initiate this phase "ex officio" when made aware, through sources or channels other than the Ethics Channel, of facts that could constitute a breach and that, to the best of their knowledge, make it advisable to open an investigation. These cases will also be recorded in the Information Management System, with an explicit note that they have been initiated "ex officio".

3.2. Designation of the body conducting the investigation

Depending on the scope, subject matter, extent and/or persons allegedly involved, the investigation may be carried out directly by the System Manager (without prejudice to any consultations or support that may be required from other departments or external advisors for its full substantiation) or may be referred to other specific departments to carry out the investigation (Investigator), especially Internal Audit. However, the System Manager will supervise the investigation of reports that they do not directly investigate, and will at all times provide support, assistance and advisory for such investigations.

The person designated to carry out the investigation may, subject to the approval of the Whistleblowing System Manager, engage external auditors or consultants to assist in the investigation and the analysis of the results. The Investigating Person in charge of the investigation will be authorised to interact with the informant in order to obtain additional details to facilitate the proper and timely conduct of the investigation. This will include requesting additional information or evidence related to the reported facts.

In addition, they will have the power to request the documentation and information they deem necessary from other offices, areas or departments of the organisation. They may also conduct interviews with such persons as they deem appropriate to verify the veracity of the facts reported. The right of the affected persons to be informed of the facts attributed to them will be guaranteed, as well as the opportunity to be heard and to exercise their right of defence in an adequate manner.

In no case will the identity of the informant be disclosed nor will access to the report received be provided to the affected persons. Communication with the affected persons will be carried out, if necessary, at such time and in such manner as deemed appropriate to ensure the success of the investigation. The identity of the informant will only be disclosed to court authorities, the Public Prosecutor's Office or the competent administrative authority in the context of a criminal or disciplinary investigation.

3.3. Investigation report

The purpose of the investigation phase is to carry out any measures deemed strictly necessary to verify the reality of the facts reported and their possible provisional classification (as a criminal offence, etc.), e.g., statements by the persons concerned/investigated, confidential questioning and interviews with witnesses, etc.

In all interviews that are conducted, the relevant facts of the interview will be noted in writing by the System Manager or the Investigator, and will be recorded in official records to be signed by the interviewees and, where appropriate, by external advisors. Likewise, all investigations will state the points required by current legislation on data protection.

Upon completion of all the steps of the investigation, the System Manager or Investigator will prepare an Investigation Report including detailed documentation of the entire investigation procedure.

The Report will contain a brief description of the following elements:

- Nature of the incident: To the extent possible, the parties involved; the nature of the facts; the date, place and circumstances in which they allegedly occurred; and the legal precepts or internal regulations breached or endangered will all be identified.
- The persons who collaborated in the investigation: The person(s) comprising the team who have collaborated with the investigation will be duly identified.

- List of relevant facts and findings: The most relevant facts gathered throughout the investigation procedure will be reported, differentiating between those obtained from documentation, from information provided by the informant, or from interviews held with the affected persons and with witnesses.
- Conclusions and assessment of the facts: The conclusions drawn will be stated with an assessment of the facts reported. These may include:
  - Closing of the report: when, after the appropriate investigation, they deem that the reported facts have not been sufficiently proven, or that they do not constitute a Breach.
  - Proposal to continue the procedure: if the investigation carried out showed that there are reasonable grounds to believe that the accused may have committed any of the breaches.

The System Manager will review the investigation report received before forwarding it to the Audit and Compliance Committee ("ACC"), regardless of whether that body conducted the investigation.

3.4. Submission of the file and final decision

The System Manager will be responsible for submitting the Investigation Report to the ACC. The ACC will decide (a final hearing with the persons concerned may be granted beforehand, if deemed strictly necessary) whether to close the case or, on the contrary, to initiate disciplinary proceedings.

The ACC decision will be forwarded:

- The Group's Human Resources Management if disciplinary action is necessary.
- The Secretary of the Board, as the Group's legal counsel, should legal action be necessary.
- The department in charge of handling the response to be taken against a reported person external to the Company.
- The Compliance Body if a specific aspect of the Compliance Management System needs to be reinforced.
- The Internal Whistleblowing System Manager for archiving, management and follow-up of the measures taken.

The informant and affected persons will in all cases be informed of the decision taken. In general, the ACC must issue a decision within the limitation periods indicated in the local legislation of each jurisdiction where the company has a presence and the investigation was carried out.

As a general rule, the statute of limitations is three months from the acknowledgement of receipt of the report by the whistleblower (if no acknowledgement of receipt was sent for the reasons set out in this protocol, the three-month limitation period will start once seven working days have passed since the day after the report was received). However, in cases of a complex investigation (due to the subject matter, the measures to be taken, etc.), the limitation period may be extended by a further three months on a reasoned basis.

G1-1-10 g)	*The disclosures in paragraph 7 shall cover the following aspects related to the undertaking's policies on business conduct matters*: ***(g) the undertaking's policy for training within the organisation on business conduct, including target audience, frequency and depth of coverage.***

CIE Automotive is committed to a policy of zero-tolerance for criminal offences, and it expects all its workers to internalise this policy. For this purpose, it will carry out training actions as necessary and with the required frequency, with the minimum frequency being once per year.

Continuous training can be included as part of the deployment of the criminal compliance model, as part of the company's ESG workshops, merely as an internal communication in its corporate magazine, as well as part of specific training programmes, such as the training carried out in 2024 on the new Professional Code of Conduct.

Training on the Professional Code of Conduct

As part of training the entire company on the changes in the Professional Code of Conduct, and on several of the corporate policies that derive from it, within the recurrent training on ethics and compliance, the company provided global training in two modalities: an online version, for those who have a corporate email, and an offline version, for those people who do not require a corporate email in their day-to-day work.

By the end of 2025, more than 95% of companies had launched global training in this area, thus meeting the target set out in the ESG Strategic Plan.

G1-1-10 h)	*The disclosures in paragraph 7 shall cover the following aspects related to the undertaking's policies on business conduct matters:* ***(h) the functions within the undertaking that are most at risk in respect of corruption and bribery.***

Corruption is a complex social, political, and financial phenomenon that exists in all countries, where it undermines democratic institutions, hinders economic development, and contributes to governmental instability.

CIE Automotive is committed to combating corruption by establishing principles to guide the behaviour of everyone in the Group. Also in relation to this commitment, CIE Automotive is a signatory of the Ten Principles of the UN Global Compact (http://www.unglobalcompact.org/). This is a voluntary pact by which companies commit to aligning their strategies and operations with 10 universally accepted principles, in 4 thematic areas: Human Rights, Labour, Environment, and Anti-Corruption.

Specifically, and in accordance with the tenth principal, CIE Automotive has a zero-tolerance policy with regard to behaviour that is likely to be considered an act of corruption and bribery, both in the public and private sphere. Consequently, CIE Automotive is committed to fighting all forms of corruption, including extortion and bribery, and to implementing specific policies on this subject.

All directors, senior managers, employees, and workers at all CIE Automotive companies must ensure that when carrying out commercial relations, their conduct always reflects the principles of integrity and transparency, while avoiding and rejecting any form of conduct that could be considered as an act of public-sector or private-sector corruption or bribery.

However, based on its accumulated experience, as well as on the reports filed through the internal channel set up for this purpose (the Whistleblowing Channel), the business areas where this type of situation is most likely to occur are those related to the management and purchase of supplies.

G1-1-11	*Undertakings that are subject to legal requirements under national law transposing Directive (EU) 2019/1937, or to equivalent legal requirements with regard to the protection of whistle-blowers, may comply with the disclosure specified in paragraph 10 (d) by stating that they are subject to those legal requirements.*

CIE Automotive's Internal Whistleblowing System (one of the main components of which is the Whistleblowing Channel) has been implemented in accordance with the requirements of the Whistleblower Protection Act and in line with international legal requirements, which derive from Directive (EU) 2019/1937 of the European Parliament and of the Council.

Compliance with this new law has led to the modification of the Whistleblowing Channel Rules, which set out the general principles of the system and how it is managed.

4.1.2.3 DR G1-2 – Management of relationships with suppliers

G1-2-14 AR 2 and AR 3	*The company should provide a description of its policy to prevent late payments, specifically to SMEs,*

CIE Automotive has a Sustainable Procurement Policy and a Global Supply Chain Manual, in which the company undertakes to ensure fair and competitive payment terms for suppliers, promoting transparency and the best possible price guaranteed by compliance with current laws and regulations.

Furthermore, as stated in the Group's Terms and Conditions of Purchase, all suppliers, whether SMEs or large companies, are treated fairly and transparently, without discrimination of any kind.

G1-2-15 a) AR 2 and AR 3	*The undertaking shall provide information about the management of its relationships with its suppliers and its impacts on its supply chain, including the following information:* ***(a) the undertaking's approach to its relationships with its suppliers, taking account of risks to the undertaking related to its supply chain and of impacts on sustainability matters; and***

Shared responsibility, shared benefits

Renewal of sustainable procurement and sourcing certification. In 2025, CIE Automotive renewed its ISO 20400 sustainable procurement and sourcing certification, remaining the only Spanish company in the sector to hold this quality seal. The annual renewal followed a rigorous audit carried out by the Spanish Association of Purchasing, Contracting and Procurement Professionals under the sustainable purchasing requirements of the International Federation of Purchasing and Supply Management (IFPSM). This audit verified that the company complied with the requirements formulated the previous year. CIE Automotive thus ratified the excellence of the Purchasing Area's operations and its contribution to the Company's sustainability and social responsibility policies. To achieve the accreditation, which is based on the UNE-15896 standard on Value-Added Purchasing Management, the following parameters were taken into account:

- Sustainable Procurement Policy,
- Selection and monitoring of suppliers,
- Procurement processes, Environmental, Social and Governance requirements in purchasing and procurement throughout the Group,
- Buyer training,
- Risk management, purchasing specifications and internal organisation,
- Alignment with the latest legislation and its requirements on Due Diligence, Taxonomy, Diversity and Inclusion.

Beyond the recognition that certification implies, it also represents a challenge for procurement teams, as it not only requires the Company to comply with ISO 20400 guidelines, but also requires its suppliers to comply with ESG standards, prohibiting them from selling to the Company without a positive assessment of their management. The ISO 20400 certification reinforces the Group's sustainability policies by extending them to its entire supply chain and lays the foundation for further progress in ESG:

- Ensuring supply chain safety.
- Avoiding financial, environmental and reputational risks.
- Instilling confidence in investors, customers and other stakeholders.
- Promoting employee welfare and helping open new markets for products and services.
- Being prepared to achieve the decarbonisation targets that CIE Automotive has set for itself, with the supply chain in scope 3 being the main generator of emissions

CIE Automotive is the only Spanish company in the automotive component sector that holds ISO 20400 certification.

G1-2-15 b) AR 2 and AR 3	*The undertaking shall provide information about the management of its relationships with its suppliers and its impacts on its supply chain, including the following information:* ***(b) whether and how it takes into account social and environmental criteria for the selection of its suppliers.***

As set out in its Global Supply Chain Manual, CIE Automotive has a Supplier ESG Portal for selecting its suppliers.

The Supplier ESG Portal is a platform focused solely on ESG management, and the entire supply chain is required to register with it to comply with the Group's requirements and commitments in this area. All registered suppliers must pass the ESG assessment for productive or direct suppliers, as well as non-productive or indirect suppliers with a purchase volume of over EUR 0.5 million/year.

The platform is free of charge and accessible at: https://supplychain,cieautomotive,com/Home/Login, and technical support is also available at: Tel: +34 910 770 157 and email: ciesupplierportal@cieautomotive,com

This platform, which in turn is an interactive channel, is designed to fulfil two objectives:

1. To help companies interested in working with CIE Automotive register with it by standardising the assessment required for them to be included on the supplier list.
2. To provide a reference tool for purchasing managers worldwide.

Once they are registered, suppliers must answer four questionnaires covering the following areas:

- Business management
- Environmental management
- ESG management
- Conflict mineral management

CIE Automotive ensures that its procurement processes are standardised, following the criteria of objectivity, impartiality and equal opportunity. Registration through the Supplier ESG Portal, (verified and renewed every four years), becomes a necessary requirement for these production suppliers working with CIE Automotive, and will bring multiple benefits to their company:

- Inclusion on the CIE Automotive Group's global supplier list.
- Expedited submission of the minimum documentation required to become a supplier to CIE Automotive.
- An easy tool for managing updates to the company's data and users.

Furthermore, signing the Supplier ESG Commitment is mandatory for both regular suppliers, as they are part of CIE Automotive's supplier list, and new suppliers.

All this information has been detailed throughout this report in response to the following indicators: *S2–4–32 a) AR 38, ESRS 2-GOV-5-36 a) AR 11, ESRS 2-SBM-2-45 a) ii-iv AR 16, S2–SBM–2-9, S2-1-17 b), S2-4-31* and *S2–4–32 a) AR 38*.

4.1.2.4 RD G1-3 – Prevention and detection of corruption and bribery

G1-3-18 a) AR 5 and AR 6	*The disclosure required under paragraph 16 shall include the following information (provide information about the undertaking's system to prevent and detect, investigate, and respond to allegations or incidents relating to corruption and bribery including the related training) shall include the following information*: ***(a) a description of the procedures in place to prevent, detect, and address allegations or incidents of corruption and bribery***.

CIE Automotive is committed to fighting fraud and corruption in all its forms, including extortion and bribery, and to developing specific policies in this area. This commitment is evidenced by its adherence to the ten principles of the United Nations Global Compact.

In addition to its Professional Code of Conduct, whose guidelines call for eradicating fraud and corruption, it also has an Anti-Corruption and Fraud Policy, which states that its relations with civil servants and authorities must be based on the principles of transparency, integrity, objectivity, impartiality and legality.

As part of its firm commitment to ethical conduct, and as an essential element of its anti-corruption strategy, CIE Automotive has implemented and maintain a comprehensive set of ethics tools. This includes an Internal Whistleblowing System that is in full compliance with EU legislation and the highest standards existing on the subject. This includes, among other elements, an internal reporting channel known as the Whistleblowing Channel, which is made available through the corresponding online platform. There is also a set of Whistleblowing Channel Rules that have been implemented and duly distributed.

These tools play a fundamental role in promoting an organisational culture based on ethics, integrity, and transparency.

The Whistleblowing Channel, which is available via an online platform accessible through the corporate website, has been designed to serve as a means of communicating information about potential legal infringements (including infringements of EU law, criminal offences, administrative infractions, occupational health and safety violations), and possible non-compliances with the Professional Code of Conduct and all the other internal rules that are part of its Compliance Management System, including all the information on preventing, detecting and handling reports or incidents of corruption or bribery. The Whistleblowing Channel offers various ways of communicating the information being reported, and whistleblowers may select any of those options.

The company is politically neutral and does not directly or indirectly finance political parties or their representatives or candidates, either in Spain or abroad.

The Internal Audit Department's duties include supervising that the Group's companies operate in accordance with its corporate values and always in compliance with the law.

As in 2024, in 2025 no public legal cases related to corruption were brought against the organisation or its employees.

Measures to prevent corruption and bribery

As is done annually, in 2025 the map was rolled out in all countries where the company operates. For each of these countries there is a specific Criminal Risk Prevention Manual, in line with the corporate manual. In addition, in each of the countries where the criminal map is deployed, training is provided in criminal matters, making the internal policies and documentation known, and reinforcing the plants' knowledge of the local legislation that applies to them.

In 2025, in line with the latest changes to the local legislation where the Company has a presence, new offences were considered and updated where necessary.

Fair competition

CIE Automotive, S.A., is committed to strict compliance with competition law. The Group also is also committed to achieving its business objectives by ethical, lawful and legally irreproachable means and to applying a fair and equitable competition regime, complying with applicable laws and legislation at all times. In the course of the year, CIE Automotive did not receive any competition-related fines, or fines due to cartel activities, price-fixing, exclusivity contracts, monopolistic practices or other activities that could have a restrictive effect on competition in the market

Measures to combat money laundering

The group has had a Criminal Risk Prevention Model in place since 2015, and it was updated in February 2024. The Company relies on this model as a measure to combat money laundering, in addition to providing training on the Professional Code of Conduct and applying its corporate policies.

To prevent or reduce as far as possible the likelihood of irregular practices and to ensure that, as soon as they are detected, they cease and that those responsible are held accountable, CIE Automotive has had a Compliance and Compliance Risk Prevention Policy in place since 2021.

G1-3-18 b)	*The disclosure required under paragraph 16 shall include the following information (provide information about the undertaking's system to prevent and detect, investigate, and respond to allegations or incidents relating to corruption and bribery including the related training) shall include the following information:* ***(b) whether the investigators or investigating committee are separate from the chain of management involved in the matter.***

The Whistleblowing Channel is intended to enable and channel the transmission of information on possible legal violations, and possible breaches of its Professional Code of Conduct, including those related to corruption and bribery.

Reports of suspected breaches and questions raised on the platform are automatically transmitted to the Chief Compliance Officer as Manager of the Internal Information System on a confidential or anonymous basis depending on the option chosen. Whistleblowers can access the platform's messaging system to find out the status of their report and communicate with the Chief Compliance Officer using the "case number" provided and the password created.

For security reasons and to preserve their confidentiality, whistleblowers cannot retrieve their "case number" or their password. Therefore, in case they forget, the reporting person will be required to start a new communication process through the platform.

As set out in the Whistleblowing Channel Rules section on designation of the body to conduct the investigation, depending on the scope, subject matter, extent and/or persons allegedly involved, the investigation may be carried out directly by the System Manager (without prejudice to any consultations or support that may be required from other departments or external advisors for its full substantiation) or may be referred to other specific departments to carry out the investigation (Investigator), especially Internal Audit.

However, the System Manager will supervise the investigation of reports that they do not directly investigate, and will at all times provide support, assistance and advisory for such investigations.

The person designated to carry out the investigation may, subject to the approval of the Whistleblowing System Manager, engage external auditors or consultants to assist in the investigation and the analysis of the results. The Investigating Person in charge of the investigation will be authorised to interact with the informant in order to obtain additional details to facilitate the proper and timely conduct of the investigation. This will include requesting additional information or evidence related to the reported facts.

In addition, they will have the power to request the documentation and information they deem necessary from other offices, areas or departments of the organisation. They may also conduct interviews with such persons as they deem appropriate to verify the veracity of the facts reported.

The right of the affected persons to be informed of the facts attributed to them will be guaranteed, as well as the opportunity to be heard and to exercise their right of defence in an adequate manner. In no case will the identity of the informant be disclosed nor will access to the report received be provided to the affected persons. Communication with the affected persons will be carried out, if necessary, at such time and in such manner as deemed appropriate to ensure the success of the investigation. The identity of the informant will only be disclosed to court authorities, the Public Prosecutor's Office or the competent administrative authority in the context of a criminal or disciplinary investigation.

G1-3-18 c)	*The disclosure required under paragraph 16 shall include the following information (provide information about the undertaking's system to prevent and detect, investigate, and respond to allegations or incidents relating to corruption and bribery including the related training) shall include the following information:* ***(c) the process, if any, to report outcomes to the administrative, management and supervisory bodies****.*

According to the Whistleblowing Channel Rules, the System Manager is responsible for submitting the Investigation Report to the Audit and Compliance Committee ("ACC"). The ACC will decide (a final hearing with the persons concerned may be granted beforehand, if deemed strictly necessary) whether to close the case or, on the contrary, to initiate disciplinary proceedings. The ACC decision will be forwarded:

- The Group's Human Resources Management if disciplinary action is necessary.
- The Secretary of the Board, as the Group's legal counsel, should legal action be necessary.
- The department in charge of handling the response to be taken against a reported person external to the Company.
- The Compliance Body if a specific aspect of the Compliance Management System needs to be reinforced.
- The Internal Whistleblowing System Manager for archiving, management and follow-up of the measures taken.

The informant and affected persons will in all cases be informed of the decision taken. In general, the ACC must issue a decision within the limitation periods indicated in the local legislation of each jurisdiction where the company has a presence and the investigation was carried out. As a general rule, the statute of limitations is three months from the acknowledgement of receipt of the report by the whistleblower (if no acknowledgement of receipt was sent for the reasons set out in the protocol, the three-month limitation period will start once seven working days have passed since the day after the report was received). However, in cases of a complex investigation (due to the subject matter, the measures to be taken, etc.), the limitation period may be extended by a further three months on a reasoned basis.

G1-3-20	*The information required in section 16 shall include details of how the company communicates its policies to the persons to whom they are relevant, in order to ensure that the policy is accessible and that they understand its implications.*

Training on the Professional Code of Conduct

As part of training the entire company on the changes in the Professional Code of Conduct, and on several of the corporate policies that derive from it, within the recurrent training on ethics and compliance, the company provided global training in two modalities: an online version, for those who have a corporate email, and an offline version, for those people who do not require a corporate email in their day-to-day work.

By the end of 2025, more than 95% of companies had launched global training in this area, thus meeting the target set out in the ESG Strategic Plan.

Internal communications

CIE Automotive is committed to a policy of zero-tolerance for criminal offences, and it expects all its workers to internalise this policy. That is why, in view of the update of its entire regulatory framework and its approval by the Board in February 2024, the Company carried out both specific campaigns to launch emails to managers and senior managers, as well as global communications to all its stakeholders, including those who make up the Group, via the half-yearly corporate magazine.

In addition, this communication is complemented by continuous training on the Professional Code of Conduct, which cites and specifies the Company's corporate policies, including its Anti-Corruption and Fraud Policy.

G1-3-21 a)	*The disclosure required under paragraph 16 shall include the following information (provide information about the undertaking's system to prevent and detect, investigate, and respond to allegations or incidents relating to corruption and bribery) shall include the following information with respect to training:* ***(a) the nature, scope and depth of anti-corruption and anti-bribery training programmes offered or required by the undertaking.***

Training on the Professional Code of Conduct

As part of training the entire company on the changes in the Professional Code of Conduct, and on several of the corporate policies that derive from it, within the recurrent training on ethics and compliance, the company provided global training in two modalities: an online version, for those who have a corporate email, and an offline version, for those people who do not require a corporate email in their day-to-day work.

By the end of 2025, more than 95% of companies had launched global training in this area, thus meeting the target set in the ESG Strategic Plan,.

Measures to prevent corruption and bribery

As is done annually, in 2025 the map was rolled out in all countries where the company operates. For each of these countries there is a specific Criminal Risk Prevention Manual, in line with the corporate manual. In addition, in each of the countries where the criminal map is deployed, training is provided in criminal matters, making the internal policies and documentation known, and reinforcing the plants' knowledge of the local legislation that applies to them.

In 2025, in line with the latest changes to the local legislation where the Company has a presence, new offences were considered and updated where necessary.

G1-3-21 b) *AR 4*	*The disclosure required under paragraph 16 shall include the following information (provide information about the undertaking's system to prevent and detect, investigate, and respond to allegations or incidents relating to corruption and bribery) shall include the following information with respect to training:* ***(b) the percentage of functions-at-risk covered by training programmes.***

CIE Automotive has a specific training plan for its key employees on the subject of criminal risk prevention. This training plan is managed by the Human Resources Department in collaboration with the Compliance Body.

Attendance at the training courses on the subject of criminal risk prevention is compulsory, and the key employees must produce written evidence that they have attended and must be given an assessment test regarding the knowledge acquired.

The training plans must include content to ensure that the employees are aware of the Professional Code of Conduct. After receiving the appropriate training, all personnel must confirm that they have obtained and agree with all the knowledge presented. They must also confirm their commitment to complying with the principles, rules, and procedures contained in this document at all times, when performing any activity in the interest of or to the benefit of CIE Automotive.

Given the global scope of both the training and the deployment of the Criminal Compliance Model, the Company considers that 100% of its at-risk functions are covered by training programmes.

The Criminal Risk Management System (CRMS), which forms part of the Criminal Compliance Model, is integrated into CIE Automotive's CRMS, a system set out in its Risk Control and Management Policy, which follows ISO 31000 methodology and provides reasonable assurance that all material offences, including corruption and bribery, are identified, assessed, prevented and monitored on an ongoing basis. These risks are approved by the Board and managed according to risk appetite and tolerance levels.

This process is coordinated by the Compliance Body, and the result are submitted to the Audit and Compliance Committee for supervision and approval, which then reports on them to the Board.

The criminal risks assessed in 2025 are the result of regulatory benchmarking of the applicable legislation in the jurisdiction of each country. This mapping took into account the Model developed and implemented in Spain, the mandatory requirements under local legislation, the local and corporate business areas likely to have a higher probability of these offences occurring, the best national and international practices, and the suggestions for improvement proposed for the various jurisdictions.

The Criminal Compliance Model, which is operational in all the countries in which the Group operates, includes training in criminal matters, to thus disseminate the internal policies and documentation, reinforcing the plants' understanding of the local legislation that applies to them.

G1-3-21 c)	*The disclosure required under paragraph 16 shall include the following information (provide information about the undertaking's system to prevent and detect, investigate, and respond to allegations or incidents relating to corruption and bribery) shall include the following information with respect to training:* ***(c) the extent to which training is given to members of the administrative, management and supervisory bodies**,*

In 2024, all the administrative, management and supervisory bodies received training on the Professional Code of Conduct and the corporate policies derived from it. The training was carried out online on a dedicated platform and remains available and in force in 2025.

This training covers the mechanisms that the company has set up to report any breach of the guidelines of the Professional Code of Conduct, including how they operate and how to use them.

In addition, in February 2024 the Board approved an update to the Company's ethical and regulatory framework, which includes the new Anti-Corruption and Fraud Policy.

In terms of Criminal Risk Prevention, CIE Automotive has a Criminal Compliance Model that is operational in all countries where the Group operates. This model includes training in criminal matters in order to raise awareness of internal policies and documentation, reinforcing knowledge of the local legislation that applies to them in the plants.

The Criminal Compliance Model, which is operational in all the countries in which the Group operates, includes training in criminal matters, to thus disseminate the internal policies and documentation, reinforcing the plants' understanding of the local legislation that applies to them.

4.1.3 Metrics and targets

4.1.3.1 DR G1-4 – Incidents of corruption and bribery

G1-4-24 a)	*The undertaking shall disclose:* ***(a) the number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws.***

As in 2024, in 2025 there were no convictions or fines for violations of anti-corruption and bribery laws. Similarly, in the course of the year, CIE Automotive did not receive any competition-related fines, or fines due to cartel activities, price-fixing, exclusivity contracts, monopolistic practices or other activities that could have a restrictive effect on competition in the market.

G1-4-24 b)	*The undertaking shall disclose:* ***(b) any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery.***

The Criminal Compliance Model, which is operational in all the countries in which the Group operates, includes training in criminal matters, to thus disseminate the internal policies and documentation, reinforcing the plants' understanding of the local legislation that applies to them.

For each of these countries there is a specific Criminal Risk Prevention Manual, in line with the corporate manual. In addition, in each of the countries where the criminal map is deployed, training is provided in criminal matters, making the internal policies and documentation known (including the Anti-Corruption and Fraud Policy), and reinforcing the plants' knowledge of the local legislation that applies to them.

CIE Automotive has an internal control system based on the "three lines of defence" model, ranging from risk identification to internal audit. In the second line of defence, the Compliance Body is responsible for reviewing and continuously improving the internal control system, both in financial and non-financial aspects. It also ensures compliance with internal regulations and external legislation, as well as policies and procedures designed to mitigate potential risks, including those related to anti-corruption and bribery.

Risks are supervised and managed by using the Risk Management and Process Control modules of the SAP GRC tool, which operates globally at all production sites, regardless of whether or not they have an enterprise resource planning system in the SAP environment. For each risk, specific controls are established, many of which are automatic, and they are assigned to the various employees in charge of them and, in the event of incidents, action plans are established with traceability over time.

In total, the Compliance Body supervises compliance with more than 250 controls, applicable to each production plant, business division or corporate office, under its Internal Control Over Financial Reporting system (ICFR) and its Internal Control Over Non-Financial Reporting (ICNFR) system, which also includes ESG, criminal and regulatory compliance, IT and data protection controls under the GDPR.

The results are reviewed in the Internal Audit Department's Annual Audit Plan, and must be reviewed and approved by Senior Management.

All the internal audit work is managed through the SAP GRC Audit Management module, which is operational for the various local internal audit departments in Brazil, Mexico, India, China and Europe. As risk management, controls and internal audit are integrated into the same control tool (SAP GRC), the synergy obtained makes the work more efficient and provides greater value to the business divisions by letting them share their experiences and success stories.

Measures to combat money laundering

The group has had a Criminal Risk Prevention Model in place since 2015, and it was updated in February 2024. The Company relies on this model as a measure to combat money laundering, in addition to providing training on the Professional Code of Conduct and applying its corporate policies.

To prevent or reduce as far as possible the likelihood of irregular practices and to ensure that, as soon as they are detected, they cease and that those responsible are held accountable, CIE Automotive has had a Compliance and Compliance Risk Prevention Policy in place since 2021.

G1-4-25 a)	*The undertaking shall disclose*: ***(a) the total number and nature of confirmed incidents of corruption or bribery.***

In 2025, a total of 16 incidents of corruption or bribery were reported, of which eight were confirmed after conducting the corresponding internal investigation, as indicated in the Ethics Channel Regulations, and the other eight were closed due to insufficient evidence found during the investigations. In addition, one report of fraud was filed, which as of the end of the 2025 financial year is still under internal investigation.

The cases reported for corruption are due to malpractice at several plants by individuals from departments such as Purchasing, Quality and Human Resources, who breached CIE Automotive's general purchasing conditions for their own benefit. Although the amounts were not significant, nor did the value of the contracts with the related suppliers materially affect the financial results of the plants involved, their existence affected the group's image and ethical commitment.

The fraud complaint is due to malpractice by individuals in the Human Resources department, although the amounts involved were not significant.

G1-4-25 b)	*The undertaking shall disclose*: ***(b) the number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents.***

In 2025, one employee was dismissed in connection with one of the 16 reported incidents of bribery and corruption, eight of which (50% of the total) were dismissed due to a lack of evidence found during the internal investigation.

In 2024, however, no dismissals were made from the CIE Automotive workforce in relation to reports of bribery and corruption.

G1-4-25 c)	*The undertaking shall disclose*: ***(c) the number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery.***

In 2025, no commercial contracts were terminated or not renewed due to violations related to corruption or bribery.

G1-4-25 d)	*The undertaking shall disclose*: ***(d) details of public legal cases regarding corruption or bribery brought against the undertaking and its own workers during the reporting period and the outcomes of such cases. This includes cases that were initiated in previous years where the outcome was only established in the current reporting period.***

CIE Automotive confirms that no public legal cases against it were opened or completed in 2025 in relation to corruption or bribery.

4.1.3.2 DR G1-5 – Political influence and lobbying activities

G1-5-29 a)	*The disclosure required by paragraph 27 (provide information on the activities and commitments related to exerting its political influence, including its lobbying activities related to its material impacts, risks and opportunities) shall include*: ***(a) if applicable, the representative(s) responsible in the administrative, management and supervisory bodies for the oversight of these activities.***

The company is politically neutral and does not directly or indirectly finance political parties or their representatives or candidates, either in Spain or abroad. Therefore, no mention is being made of the representatives responsible in the administrative, management and supervisory bodies.

G1-5-29 b)	*The disclosure required by paragraph 27 (provide information on the activities and commitments related to exerting its political influence, including its lobbying activities related to its material impacts, risks and opportunities) shall include*: ***(b) for financial or in-kind political contributions:*** ***i. the total monetary value of financial and in-kind political contributions made directly and indirectly by the undertaking aggregated by country or geographical area where relevant, as well as type of recipient/beneficiary;*** ***ii. where appropriate, how the monetary value of in-kind contributions is estimated.***

The company is politically neutral and does not directly or indirectly finance political parties or their representatives or candidates, either in Spain or abroad. Therefore, no mention is being made of the representatives responsible in the administrative, management and supervisory bodies.

In 2025, as in 2024, the total monetary value of financial and in-kind political contributions made directly and indirectly by the Company was EUR 0.

G1-5-29 c)	*The disclosure required by paragraph 27 (provide information on the activities and commitments related to exerting its political influence, including its lobbying activities related to its material impacts, risks and opportunities) shall include*: ***(c) the main topics covered by its lobbying activities and the undertaking's main positions on these in brief. This shall include explanations on how this interacts with its material impacts, risks and opportunities identified in its materiality assessment per ESRS 2.***

The company is politically neutral and does not directly or indirectly finance political parties or their representatives or candidates, either in Spain or abroad. Therefore, no mention is being made of the representatives responsible in the administrative, management and supervisory bodies. Therefore, there are no interactions with the material impacts, risks and opportunities identified in the double materiality assessment performed.

G1-5-29 d)	*The disclosure required by paragraph 27 (provide information on the activities and commitments related to exerting its political influence, including its lobbying activities related to its material impacts, risks and opportunities) shall include*: ***(d) if the undertaking is registered in the EU Transparency Register or in an equivalent transparency register in a Member State, the name of any such register and its identification number in the register.***

At year-end 2025, CIE Automotive was not registered in the EU Transparency Register or in an equivalent transparency register in a Member State.

G1-5-30	*The disclosure shall also include information about the appointment of any members of the administrative, management and supervisory bodies who held a comparable position in public administration (including regulators) in the 2 years preceding such appointment in the current reporting period.*

At year-end 2025, CIE Automotive had not appointed any member of the administrative, management and supervisory bodies who held a comparable position in a public administration in the preceding two years earlier.

4.1.3.3 DR G1-6 – Payment practices

G1-6-33 a)	*The disclosure under paragraph 31 shall include (provide information on the undertaking's payment practices, especially with respect to late payments to small and medium enterprises (SMEs)) should include:* ***(a) the average time the undertaking takes to pay an invoice from the date when the contractual or statutory term of payment starts to be calculated, in number of days.***

CIE Automotive has assessed its capacity to collect information on the average time it takes the company to pay an invoice from the date on which the contractual or legal payment term begins to be calculated, in number of days, applying an approach based on the principle of reasonable effort, which takes into account both the level of influence and the availability of resources, ensuring an appropriate balance between the quality of the information reported and the feasibility of the data collection effort.

In this second year of application of the Directive, only the data for Spain will be reported, as it is the only one available, included in Note 15 of the Consolidated Financial Statements of CIE Automotive S.A. at year-end 2025. The company is working to include this information for the other countries in future reports.

G1-6-33 b)	*The disclosure under paragraph 31 shall include (provide information on the undertaking's payment practices, especially with respect to late payments to small and medium enterprises (SMEs)) should include:* ***(b) a description of the undertaking's standard payment terms in number of days by main category of suppliers and the percentage of its payments aligned with these standard terms.***

CIE Automotive has assessed its capacity to collect information relating to the description of its standard payment terms in number of days by main category of suppliers and the percentage of its payments aligned with these standard terms, applying an approach based on the principle of reasonable effort, which takes into account both the level of influence and the availability of resources, ensuring an appropriate balance between the quality of the information reported and the feasibility of the data collection effort.

In this second year of application of the Directive, no information will be reported on the description of the Company's standard payment terms in number of days by main category of suppliers and the percentage of its payments aligned with these standard terms, and only the data for Spain will be reported, as included in Note 15 to CIE Automotive S.A.'s 2025 Consolidated Financial Statements. To report on this in years to come, work will be done on compiling this information.

G1-6-33 c)	*The disclosure under paragraph 31 shall include (provide information on the undertaking's payment practices, especially with respect to late payments to small and medium enterprises (SMEs)) should include:* ***(c) the number of legal proceedings currently outstanding for late payments.***

CIE Automotive confirms that at year-end 2025 there were no legal proceedings currently outstanding for late payments.

G1-6-33 d)	*The disclosure under paragraph 31 shall include (provide information on the undertaking's payment practices, especially with respect to late payments to small and medium enterprises (SMEs)) should include:* ***(d) complementary information necessary to provide sufficient context. If the undertaking has used representative sampling to calculate the information required under point (a), it shall state that fact and briefly describe the methodology used.***

CIE Automotive has assessed its ability to collect information regarding complementary information necessary to provide sufficient context, If the undertaking has used representative sampling to calculate the information required under point (a), it shall state that fact and briefly describe the methodology used, applying an approach based on the principle of reasonable effort, which takes into account both the level of influence and the availability of resources, ensuring an appropriate balance between the quality of the information reported and the feasibility of the data collection effort.

In this second year of implementation of the Directive, complementary information necessary to provide sufficient context will not be reported, If the undertaking has used representative sampling to calculate the information required under point (a), it shall state that fact and briefly describe the methodology used. To report on this in years to come, work will be done on compiling this information

5. Indicators under the Non-Financial Disclosures and Diversity Reporting Act not covered by the European Sustainability Reporting Standards

The analysis below refers to the requirements of the Spanish Non-Financial Disclosures and Diversity Reporting Act [*Ley 11/2018, en materia de información no financiera y diversidad*] that are not explicitly included in the ESRS requirements. However, at least some of them may be covered by additional disclosures in the framework of the application of the ESRS because they are relevant to the reporting entity.

Information on social and personnel issues:

- Distribution of staff by professional category:

2024	Men			Total men	Women			Total women	TOTAL
	<30	30-50	>50		<30	30-50	>50		
Management Committee		1	5	6		4		4	10
Senior management	17	589	279	885	10	90	26	126	1,011
Degree holders	1,317	3,532	951	5,800	381	725	179	1,285	7,085
Supervisors	3,018	7,228	2101	12,347	819	2,262	796	3,877	16,224
Total	4,352	11,350	3,336	**19,038**	1,210	3,081	1,001	**5,292**	**24,330**

2025	Men			Total men	Women			Total women	TOTAL
	>30	30-50	<50		>30	30-50	<50		
Management Committee		1	5	6		4		4	10
Senior management	25	653	286	954	6	93	25	124	1,078
Degree holders	1,358	3,615	1,013	5,986	378	745	203	1,326	7,312
Supervisors	4,129	7,120	2,242	13,491	822	2,319	859	4,000	17,491
Total	5,512	11,379	3,546	**20,437**	1,206	3,161	1,087	**5,454**	**25,891**

Types of contracts	2024	2025
Permanent contract	21,323	21,378
Fixed-term contract	3,007	4,513
Total	**24,330**	**25,891**
Full time	24,209	25,736
Part-time	121	155
Total	24,330	25,891

- Average remuneration and its evolution broken down by gender, age and professional classification or equal value (the remuneration of the Chief Executive Officer is not included in this table as there is no employee in a comparable professional classification):

	Sex		Age			Professional classification		
	Men	Women	< 30 years old	30-50 years old	> 50 years old	Senior management	Degree holders	Supervisors
2024	19,103	16,565	10,539	18,132	30,814	60,931	22,604	14,177
2025	19,225	17,156	10,683	18,372	31,050	61,548	23,210	14,221

- The average remuneration of the directors and executives, including variable remuneration, allowances, indemnifications, payments into long-term savings and benefits schemes and any other payments broken down by sex:

2024	Total workers	Men	Average remuneration (EUR)	Women	Average remuneration (EUR)
Board Members*	6	3	2,516,991	3	110,000
Senior Management	9	5	1,131,455	4	391,150

**Remunerated directors: two executive directors, three independent directors and the chairman.*

2025	Total workers	Men	Average remuneration (EUR)	Women	Average remuneration (EUR)
Board Members*	6	3	3,295,341	3	110,000
Senior Management	9	5	1,114,527	4	392,889

**Remunerated directors: two executive directors, three independent directors and the chairman.*

- Work-related accidents, in particular their rate and severity, and occupational illnesses, broken down by gender:

	2024			2025		
	Men	Women	**Total**	Men	Women	**Total**
Accidents	291	70	**361**	322	95	417
Occupational illnesses	16	7	**23**	14	4	18

	2024	2025
Frequency rate	6.74	7.57
Severity rate	0.14	0.13

- Number of dismissals by gender, age and professional classification:

2024	Men			Total men	Women			Total women	TOTAL
	<30	30-50	>50		<30	30-50	>50		
Senior management	1	22	19	42	1	5	0	6	48
Degree holders	82	173	51	306	42	59	11	112	418
Supervisors	298	333	79	710	94	148	52	294	1,004
Total	381	528	149	**1,058**	137	212	63	**412**	**1,470**

2025	Men			Total men	Women			Total women	TOTAL
	>30	30-50	<50		>30	30-50	<50		
Senior management	0	11	9	20	0	1	1	2	22
Degree holders	132	260	77	469	67	66	14	147	616
Supervisors	455	576	173	1,204	212	292	82	586	1,790
Total	587	847	259	**1,693**	279	359	97	**735**	**2,428**

Note: The increase in employee departures in 2025 is mainly due to one-off staffing adjustments resulting from organisational and production changes throughout the financial year.

- Number of hours of absenteeism:

	2024	2025
Lost hours	2,466,085	3,278,193
Absenteeism %	5%	5.8%

- Total number of training hours by professional category:

Hours	2024	2025
Senior management	82,396	77,316
Degree holders	220,340	266,042
Supervisors	504,357	502,950

Information relative to anti-corruption and bribery, and information on the undertaking:

In its Social Action Policy, CIE Automotive is committed to providing solutions to the difficulties and needs in the communities where it operates, through three types of actions:

- Donations: these are one-off instances of financial assistance given to non-governmental organisations (NGOs) and similar organisations, to help them perform their community-based activities.
- Sponsorship and patronage: carried out either at Group level or at the local individual company level, in line with the principles outlined in this policy.
- Investments in communities: long-term investments aimed at improving the communities where the Group is present.

	2024	2025
Total (€)	957,634	933,493
No, of employees who have participated in the activities	5,142	4,579
Estimated number of beneficiaries	62,542	17,066
No, of hours personal work devoted to activities	7,212	3,104

As part of its business activities, CIE Automotive interacts with various public administrations. These interactions always take place within a strict framework of legality and maximum transparency, in accordance with the principles of the Professional Code of Conduct.

The Company is not associated with any type of political views in Spain or any other country, and it prohibits any type of contribution made for and on behalf of the company to a political party or its representatives or candidates, or any type of contribution that has, or could come to have, any type of political implications. Therefore, as in 2024, in 2025, the Company confirms that it is politically neutral and does not directly or indirectly finance political parties or their representatives or candidates, either in Spain or abroad.

Other:

- Tax information: profits made country by country, income tax paid and public subsidies received

	2024		2025	
Tax jurisdiction	**Profit/(loss) before corporate income tax**	**Corporate income tax paid (cash basis)**	**Profit/(loss) before corporate income tax**	**Corporate income tax paid (cash basis)**
India	98.9	19.4	98.6	23.4
Mexico	95.8	25.8	94.1	30.9
Brazil	84.0	10.7	89.4	16.7
Basque Country	14.7	0.1	50.6	0.0
China	44.2	7.3	37.7	6.2
Spanish common territory	29.1	7.4	25.4	4.8
Slovakia	9.4	2.0	16.9	1.9
Romania	6.8	1.2	12.5	1.5
France	4.1	1.7	9.8	0.9
Germany	13.1	1.7	9.5	0.6
Czech Republic	6.4	1.7	9.4	1.5
Lithuania	7.9	1.3	8.4	1.2
USA	7.1	0.7	7.6	0.2
Italy	13.7	3.7	6.7	2.1
Navarre regional territory	1.4	0.3	1.2	0.2
Portugal	1.1	0.2	1.2	0.0
South Korea	0.2	0.1	0.1	0.0
Barbados	0.0	0.0	0.0	0.0
Netherlands	0.0	0.0	-0.0	0.0
Morocco	0.2	0.0	-0.1	0.0
Russia	0.0	0.0	-0.4	0.0
Hungary	-1.5	0.0	-3.4	0.0
Total (in millions of EUR)	**436.6**	**85.3**	**475.2**	**92.1**

The information included in this table is submitted in Form 231. Informative Tax Return of the Provincial Council of Bizkaia, a form that follows Council Directive (EU) 2016/881 of 25 May 2016 amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation, which regulates the country-by-country reports that "groups of multinational companies" must submit each year for each tax territory in which they operate. The main purpose of this report is to provide the necessary information for the risk analysis of related-party transactions, thus facilitating the work of tax administrations, which can use it to assess other risks related to tax base erosion and profit shifting.

To adapt the local laws to this Directive, the obligation to present country-by-country information was regulated in sections 43(10) and (11) of the Basque Corporate Income Tax Act [*Norma Foral 11/2013, de 5 de diciembre, del Impuesto sobre Sociedades*], and section 21 bis of Basque Provincial Decree 203/2013, of 23 December, which enacted the Basque Corporate Income Tax Regulation [*Reglamento del Impuesto sobre Sociedades*].

In 2025, CIE Automotive received EUR 1.8 million in operating subsidies, EUR 0.5 million more than in 2024. Of the total received, EUR 1.4 million was received in Spain and EUR 0.4 million in China, Italy and Hungary.

6. Indicator tracking table based on the requirements of the Non-Financial Disclosures and Diversity Reporting Act and Directive (EU) 2022/2464 of the European Parliament and of the Council on Corporate Sustainability Reporting

Scope	Indicator	Material	Selected criteria ESRS / GRI	Page
Business model	Brief description of the group's business model (business environment and organisation)	Yes	ESRS 2 GOV-1 ESRS 2 GOV-2 ESRS 2 SBM-1 G1-1	8-13 14-21 31-38 272-280
	Geographical presence	Yes	ESRS 2 SBM-1 G1-1	31-38 272-280
	Aims and strategies of the organisation	Yes	ESRS 2 SBM-1	31-38
	Main factors and trends that may affect their future performance	Yes	ESRS 2 SBM-2 ESRS 2 SBM-3 ESRS 2 IRO-1 ESRS 2 MDR-M	39-41 42-46 47 57
Materiality	Materiality analysis	Yes	ESRS 2 SBM-2 ESRS 2 SBM-3 ESRS 2 IRO-1 ESRS 2 IRO-2	39-41 42-46 47 48-56
Management approach	Management approach: Policies and risks.	Yes	ESRS 2 SBM-3 ESRS 2 MDR-P ESRS 2 IRO-1 ESRS 2 IRO-2 E1-2 E2-1 E3-1 E5-1 G1-1 S1-1 S2-1	42-46 57 47 48-56 82-84 113-115 133-136 149-152 272-280 179-187 229-237
Environmental management	Current and foreseeable effects of the company's activities on the environment and, if applicable, on health and safety	Yes	ESRS 2 IRO-1	47
	Environmental assessment or certification procedures	Yes	ESRS 2 MDR-A E1-3 E2-2 E3-2 E5-2	57 84-94 116-123 136-142 152-162
	Resources devoted to environmental risk prevention	Yes	ESRS 2 SBM-3 ESRS 2 MDR-A E1-3 E1-9 E2-2 E3-2 E5-2	42-46 57 84-94 109-111 116-123 136-142 152-162
	Application of the precautionary principle	Yes	ESRS 2 MDR-A E1-3 E1-9 E2-2 E3-2 E5-2	57 84-94 109-111 116-123 136-142 152-162
	Number of provisions and guarantees for environmental risks	Yes	ESRS 2 MDR-A E1-3 E1-9 E2-2 E3-2 E5-2	57 84-94 109-111 116-123 136-142 152-162

Scope	Indicator	Material	Selected criteria ESRS / GRI	Page
Pollution	Measures to prevent, reduce or remedy carbon emissions that seriously affect the environment (also includes noise and light pollution)	Yes	ESRS2 MDR-T ESRS2 MDR-A E2-2 E2-3	57 57 116-123 124-130
Circular economy and waste prevention and management	Measures to prevent, recycle, reuse, other forms of recovery and waste disposal	Yes	ESRS 2 MDR-A E5-2 E5-5	57 152-162 170-173
	Actions to combat food waste	No	N/A	N/A
Sustainable use of resources	Water consumption and water supply in accordance with local constraints	Yes	E3-4	145
	Consumption of raw materials and measures taken to improve the efficiency of their use	Yes	ESRS2 MDR-A E5-2 E5-4	57 152-162 168-170
	Direct and indirect energy consumption	Yes	E1-5	99-101
	Measures taken to improve energy efficiency	Yes	ESRS2 MDR-A E1-3	57 84-94
	Use of renewable energy	Yes	E1-5	99-101
Climate change	Material elements of emissions of greenhouse gases generated as a result of the company's activities, including the use of the goods and services it produces	Yes	E1-6	101-108
	Measures adopted to adapt to the consequences of climate change;	Yes	ESRS 2 MDR-A ESRS2 SBM-3 E1-1 E1-3	57 42-46 64-68 84-94
	Voluntary medium and long-term reduction targets to reduce greenhouse gas emissions and the means implemented for this purpose.	Yes	ESRS2 MDR-T E1-1 E1-4	57 64-68 94-99
	Taxonomy	Yes	Own methodology based on compliance with EU Regulation 2020/852 of 22 June,	58-64
Protection of biodiversity	Measures taken to preserve or restore biodiversity	No	N/A	N/A
	Impacts caused by activities or operations in protected areas	No	N/A	N/A
Employment	Total number and distribution of employees based on criteria representative of diversity (sex, country, occupational classification…)	Yes	S1-6 S1-9 GRI 405-1	207-211 214 290
	Total number and distribution of types of employment contracts	Yes	S1-6 S1-9 GRI 2-7	207-211 214 290
	Average annual number of permanent contracts, temporary contracts and part-time contracts by gender, age and occupational grouping.	Yes	S1-6 GRI 2-7	There were no significant changes in the workforce during the year, so data are reported only at year-end,
	Number of dismissals by sex, age and occupational classification	Yes	S1-6 GRI 401-1	207-211 291
	Average remuneration and its evolution broken down by sex, age and occupational classification or equal value	Yes	S1-16 GRI 3-3	220 290

Scope	Indicator	Material	Selected criteria ESRS / GRI	Page
	Pay gap, remuneration for equal or average jobs in the company	Yes	S1-16 GRI 405-2	220
	The average remuneration of directors and executives, including variable remuneration, allowances, indemnities and payments to long-term savings schemes and any other payments disaggregated by sex	Yes	GRI 2-19 GRI 2-20 GRI 3-3	291
	Implementation of policies of disconnecting from work	Yes	ESRS2 MDR-P S1-1	57 179-187
	Employees with disabilities	Yes	S1-12	216
Organisation of work	Organisation of work time	Yes	ESRS2 MDR-P S1-1	57 179-187
	Number of hours of absenteeism	Yes	GRI 3-3 S1-14	291 217-219
	Measures to facilitate the enjoyment of work-life balance and encourage the co-responsible exercise of these measures by both parents	Yes	ESRS2 MDR-A ESRS2 MDR-T S1-4 S1-15	57 57 197-204 219-220
Health and safety	Occupational health and safety conditions	Yes	S1-1 S1-11 S1-14	179-187 215 217-219
	Accidents at work, in particular their frequency and severity, as well as occupational diseases; disaggregated by sex.	Yes	S1-14	217-219
Social relationships	Organisation of social dialogue, including procedures for informing and consulting staff and negotiating with them	Yes	S1-2	187-192
	Mechanisms and procedures that the Company has in place to promote the involvement of employees in the Company's management, in terms of information, consultation and participation	Yes	S1-1 S1-3	179-187 192-197
	Percentage of employees covered by collective bargaining agreement, by country	Yes	S1-8 S1-15	212-214 219-220
	Review of collective agreements, particularly in the field of occupational health and safety	Yes	S1-8	212-214
Educational qualifications	Policies implemented in the field of training	Yes	ESRS2 MDR-P S1-1	57 179-187
	Total number of training hours by professional category,	Yes	S1-13	216-217
Universal accessibility of disabled persons	Physical measures to ensure accessibility to the Company's facilities for all.	Yes	ESRS2 MDR-P S1-1	57 179-187
Equality	Measures adopted to promote equal treatment and opportunities between women and men	Yes	ESRS2 MDR-T ESRS2 MDR-A S1-4 S1-5	57 57 197-204 204-207
	Equality plans (Chapter III of the Spanish Equal Rights Act [*Ley Orgánica 3/2007, para la igualdad efectiva de mujeres y hombres*]), measures adopted to promote employment, protocols against sexual and gender-based harassment, integration into the labour market and the universal accessibility of people with disabilities	Yes	ESRS2 MDR-P S1-1	57 179-187
	Policy against all forms of discrimination and, where appropriate, diversity management	Yes	ESRS2 MDR-P S1-1	57 179-187
Information on respect for human rights	Implementation of human rights due diligence procedures; prevention of risks of human rights abuses and, where appropriate, measures to mitigate, manage and remedy possible abuses committed	Yes	ESRS2 MDR-P S1-1 S1-3 S2-4	57 179-187 192-197 240-251

Scope	Indicator	Material	Selected criteria ESRS / GRI	Page
	Reports of cases of human rights abuses	Yes	S1-17	220-223
	Promotion and enforcement of the provisions of the core conventions of the International Labour Organisation relating to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in respect of employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour	Yes	ESRS2 MDR-P S1-1 S2-1	57 179-187 229-237
Information related to the fight against corruption and bribery	Measures adopted to prevent corruption and bribery	Yes	S1-3 G1-3	192-197 282-286
	Measures to combat money laundering	Yes	S1-3 G1-3	192-197 282-286
	Contributions to foundations and non-profit entities	Yes	GRI 2-28	292
Company commitments to sustainable development	Impact of the company's activity on employment and local development	No	N/A	N/A
	Impact of the company's activities on local communities and on the land	No	N/A	N/A
	Relations with local community stakeholders and the modalities of dialogue with them	No	N/A	N/A
	Partnership or sponsorship actions	No	N/A	N/A
Subcontracting and suppliers	Inclusion of social, gender equality and environmental issues in the procurement policy	Yes	ESRS2 MDR-P S2-1 S2-4 G1-1 G1-2	57 229-237 240-251 271-280 280-282
	Consideration of social and environmental responsibility of suppliers and subcontractors in relations with them	Yes	ESRS2 SBM-1 ESRS2 MDR-P S2-1 S2-4 G1-1 G1-2	31-38 57 229-237 240-251 271-280 280-282
	Supervision systems and audits and their results	Yes	GRI 2-6	248-249
Consumers	Measures for consumer health and safety	No	N/A	N/A
	Claims systems	No	N/A	N/A
Tax information	Profit obtained by country	Yes	GRI 3-3 GRI 207-4	293
	Income tax paid (by country)	Yes	GRI 3-3 GRI 207-4	293
	Government subsidies received	Yes	GRI 3-3	293