

ANTOLIN MODERN SLAVERY STATEMENT 2024

This statement is made by Grupo Antolin Irausa, S.A.U., as parent company of Antolin, pursuant to section 54 of the Modern Slavery Act 2015, to identify the steps that have been taken to prevent slavery and human trafficking from taking place in any part of its business and of its supply chain. This statement has also been made by its affiliates Grupo Antolin Leamington Ltd. and Antolin Interiors UK Ltd.

This statement under the Act mentioned is referred to the financial year ended on 31 December 2024.

ABOUT ANTOLIN

Antolin is a leading multinational company specializing in the design, development, manufacture, and supply of components for automobile. As the strategic ally of more than one hundred vehicle manufacturers around the world, the company is a global supplier of innovative technological solutions for automobile interiors at a time when new mobility paradigms are making this a more sustainable and technologically advanced space that aims to improve the travel experience.

Antolin's work covers every process of the product cycle, from the very conception to mass delivery, including the components' design, all with the highest quality standards. Its excellence has established Antolin as a **full-service supplier car interior industry**.

The company's products and solutions are **grouped into Business Units (BUs)** organized within **two main areas** that distinguish between consolidated businesses and those with a more technological component to maximize the potential of each segment, fostering optimized development aligned with the specific strengths of each area:

- Product Systems, divided into four business units: headliners, door panels and hard trim, instrument panels and central consoles and components and JIT;
- Technology Solutions, including lighting, HMI (Human Machine Interface) and electronic control units.

Antolin supplies a wide range of products focused on the vehicle interior more than 110 vehicle brands worldwide. The company has revolutionized the user experience in nearly **700 car models**, specifically, **9 of the 10 best-selling vehicles worldwide** or the **top ten best-selling cars in Europe**, are equipped by Antolin in 2024.

At 31 December 2024, Antolin boasts a superb international position with a presence in **23 countries** and employs nearly **20,000 people** in approximately **111 production plants** and **Just In Time (JIT)** assembly and sequencing centers, and **25 technical-commercial offices**. The company headquarters are in Burgos, Spain.

Thanks to the added value of its products, countries and customers, the company can take advantage of diverse global growth opportunities, particularly owing to its presence in Asia-Pacific, Eastern Europe, North America and, South America which helps mitigate the impact of fluctuations in local and regional production on the business, especially in recent years, when global supply chain problems have arisen.

It started over 70 years ago as a modest family business founded in a small workshop in the city of Burgos, Spain. At present, **Antolin is fully owned by the Antolin family**, whose members are wholeheartedly committed to the long-term strategy and growth of the business. The functions of the Chair and CEO are performed by two different people, who provide different perspectives and skills at the helm of the organization.

At a critical time for the automotive industry and mobility in general, Antolin has set out its own management path guided until 2026 by its **Transformation Plan** launched in 2023. As a result of this period of evolution, their **vision and values** have been **reformulated** to make them a clear reflection of the company; a modern and innovative reality that is based on our historical desire to excel as their essence and guide our work and our business: **"Creating the mobility of the future from the inside, offering smart, integrated and sustainable solutions that contribute to a better world."**

At Antolin, they believe that success and the safeguarding of its future development as a company depends on, amongst other factors, its **sustainable business strategy**. Sustainability in Antolin is its way of being and doing things to consolidate a people-centric Sustainable Business model based on **three keys to value creation: Planet, People and Business**, aligned with the Sustainable Development Goals and the 2030 Agenda of the United Nations.

As a global player in the automotive sector with a team of qualified professionals committed to its code of conduct & ethics, they align their strategies and operations to the main sustainable initiatives and international institutions such as the Paris Agreement, Global Compact, CDP and STBi, as well as sectorial initiatives such as AIAG, Drive Sustainability, and the automotive industry action group.

1. Figure on 2024 ESG targets and main progress

		Targets	Main developments 2024
 VALUE FOR THE PLANET	Carbon-neutral company by 2050	CO₂-neutral in own operations (Scopes 1 and 2) by 2040 -75% CO ₂ emissions by 2028 (compared to 2019) Carbon neutral (Scopes 1, 2 and 3) by 2050 Validation of SBTi targets for 2024 (committed in 2022)	Increase in the use of renewable electricity up to 23.01% 37,092 tons of CO ₂ avoided Extension of the calculation methodology for Scope 2 emissions: market and location-based 22.8% reduction in CO ₂ emissions (Scope 1 and 2) compared to 2019 Mapping of all applicable Scope 3 categories completed, six new categories in 2024, representing 92% of total emissions
	Circular business	Ecodesign. Life cycle assessment on main products 40% sustainable plastics by 2030 (20% in 2025) 10% reduction in non-hazardous waste by 2028 (compared to 2019)	Update of life cycle assessments on existing products and new analysis on lighting products NEXUS, a door concept. Integration of circularity and sustainability through a modular "plug and play" system that facilitates recyclability at all stages of the product life cycle 50% increase in the consumption of sustainable plastics by 2023 38.72 % reduction compared to 2019 (7.6 % compared to 2023) Agreement with Casa DIFF to reuse 82% of the headliner substrates waste generated in Spain, thus averting 135 tons of landfill waste by 2024

		Targets	Main developments 2024
 VALUE OF PEOPLE	Zero accidents. Safe and healthy working environment	2.30 reduction in the overall frequency rate by 2030 2.70 by 2025	2.52 frequency rate with a 15% reduction vs. 2023
	Diversity, equity and inclusion, applied to talent	15% reduction of the pay gap by 2025 (vs. 2021: 3.55%)	Percentage increase due to structural factors with change of perimeter and revision of the indicator by 2025 50% presence of women on governing bodies
	Driver of social development	Promoting initiatives for the economic development of society	€44.79 contribution per employee
 AN ADDED BUSINESS VALUE	A benchmark in ethics, integrity and compliance	100% of confirmed ESG complaints resolved 100% of the workforce trained in the Code of Ethics in 2025	100% of confirmed ESG complaints resolved (47 complaints, 20 upheld and resolved) 99% trained on target group based on the risk approach
	Responsible supply chain	96% adherence to the Code of Conduct for production suppliers (direct material and investments) 90% of direct supply chain assessed on ESG by 2026 94% adherence to CMRT (Conflict Minerals Reporting Template) by 2026	90% adherence to the Code of Conduct for production suppliers (direct material and investments) 76.20% of direct supply chain assessed on ESG by 2024, up 4.8% on 2023 100% adherence to CMRT (Conflict Minerals Reporting Template)

Key sustainability projects in 2024:

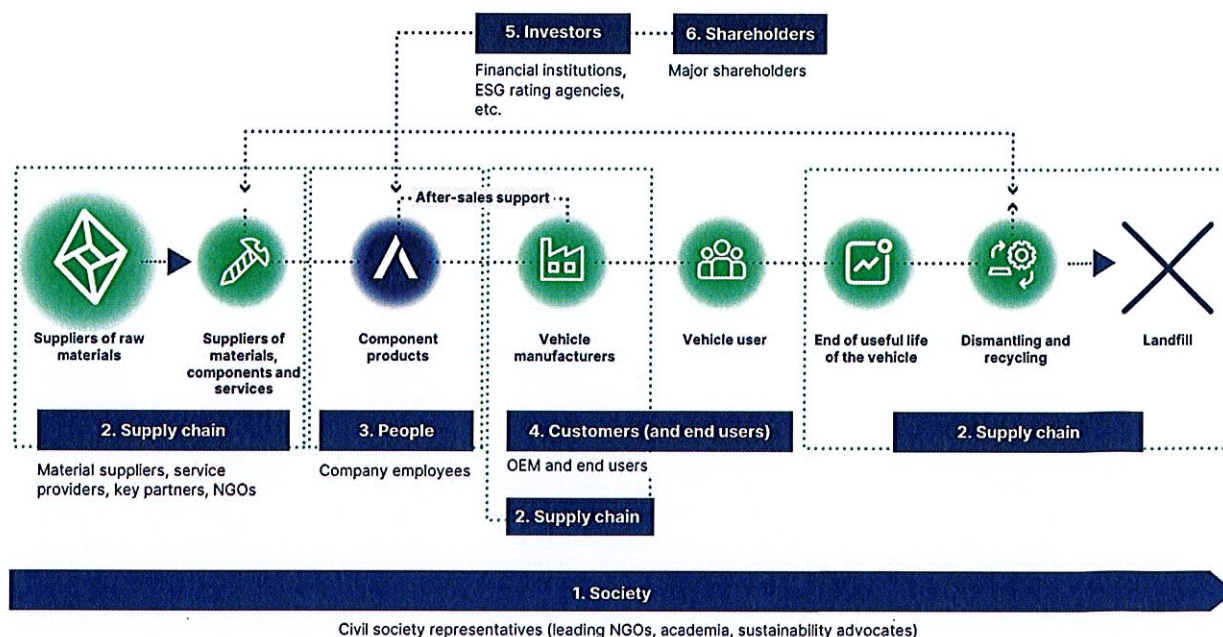
As part of its transformation process and the reformulation of the company's vision and values, Antolin's management launched two key projects in 2024 that will devise the company's roadmap in terms of sustainability: ESG B2V (business to value) Strategy and the decarbonization project. Both initiatives address sustainability in a cross-cutting manner and combine the efforts of different areas of the company in their respective areas of responsibility.

Linked to ESG B2V (business to value) Strategy, Antolin identified 17 material topics from the perspective of double materiality (impact and financial materiality) and in terms of the impacts, risks and opportunities (IROs) associated with its own operations and its value chain, in accordance with the Corporate Sustainability Reporting Directive (CSRD) beyond regulatory compliance.

VALUE CHAIN AND STAKEHOLDER MAPPING

Following the guidelines of the CSRD, in 2024 Antolin identified the main players and stages within its value chain - across the cycle from upstream to downstream - as well as the key stakeholders involved in each stage: customers, employees, investors, shareholders, society and supply chain,

2. Figure on Value chain and stakeholder mapping



ANTOLIN'S COMMITMENT TO HUMAN RIGHTS

Antolin is firmly committed to a sustainable business model that combines profitability with the economic, social, and environmental well-being of society using a human rights approach, particularly in those activities and countries where it is present.

The company embraces and integrates the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights (UNGP), and extends compliance therewith to all stakeholders, by the highest ethical and professional standards, and always complies with all local laws and regulations applicable to its business. Antolin expects the same high standards which we set for themselves from those parties with whom they engage.

All decisions and actions taken by Antolin must meet criteria of integrity, ethics and transparency in line with respect for human rights. As part of its culture of prevention, mitigation and remedy, Antolin's Code of Ethics and Conduct and the Corporate Social Responsibility and Human Rights Policy steers the organization and its supply chain toward complying with these tenets in the quest for increased commitment and accountability to combat modern slavery, including servitude, forced labor and human trafficking. Both documents form part of the corporate governance model and are issued directly by the company's Board of Directors, at the proposal of its Sustainability and Corporate Governance Committee. They must be interpreted alongside the organization's other policies which expound upon each of the principles and commitments undertaken by the company.

Respect for, promotion of and compliance with the Code and policies extend beyond Spain's borders to commercial, industrial, financial and value chain activity on a global scale. The Compliance Department is responsible for ensuring compliance with human rights commitments in all geographies where Antolin is present. The effectiveness of the company's human rights management model and the control activities implemented are regularly

reviewed by Antolin's own Internal Audit department. Thanks to this approach, 100% of the complaints processed in 2024 were investigated and resolved.

The results are reported to the Audit and Sustainability and Corporate Governance delegated Committees reporting to the Board of Directors, made up of company executives, non-executive members and independent advisory directors, and the CEO.

In accordance with the framework set by the Guiding Principles of Business and Human Rights, Antolin's human rights management model follows three steps:



1. PUBLIC COMMITMENTS IN RESPECT OF HUMAN RIGHTS

Antolin's firm commitment to human rights includes strict adherence to all labor standards that promote the fight against forced, child and youth labor, as well as compliance with the legislation in force in each country regarding hours worked and social dialogue.

To anticipate and respond to any issues in this area, Antolin carries out a continuous analysis of trends, stakeholder expectations and regulatory requirements. In this regard, human rights have been considered in the double materiality assessment conducted in 2024 as a precursor to mandatory compliance with the CSRD. As a result of this study, topics linked to this area of human rights, such as working conditions, equal treatment and opportunities for all, and other work-related rights of both own staff and employees in the value chain, have been identified as material.

External reference framework:

- United Nations Universal Declaration of Human Rights.
- The 2030 Agenda: Sustainable Development Goals 3, 4, 5, 7, 8, 10, 16 and 17.
- The Principles of the United Nations Global Compact. Principles 1, 2, 3, 4, 5 and 6.
- Guiding Principles on Business and Human Rights.
- Children's Rights and Business Principles. OECD Guidelines for Multinational Enterprises.
- Guidelines and Principles of the International Labour Organization (ILO), Conventions 29, 87, 98, 100, 105, 111, 138, 182.
- The Global Sullivan Principles of corporate social responsibility.
- Section 1502 on conflict minerals of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
- Street Reform and Consumer Protection Act
- World Benchmarking Alliance. Corporate Human Rights Benchmark (CHRB).
- German Due Diligence Law.

Internal reference framework

- Code of Ethics and Conduct.
- Sustainable Business Model Strategy: Planet, People and Business.
- Corporate Social Responsibility (CSR) and Human Rights Policy.

- Commitment against modern slavery and human trafficking: Modern Slavery and Human Trafficking Statement.
- Conflict Minerals Policy.
- Compliance Management System. Model of organization and management of criminal risks.
- Suppliers' Manual.
- Suppliers' Code of Conduct.

As part of its commitment to Human Rights and with the labor standards in the countries where the Company is present, **Antolin supports the elimination of all forms of forced and compulsory labor**; recognizes and defends freedom of association and the effective recognition of the right to collective bargaining; respects the current legislation in each country with regards to working hours; applies wage policies in accordance with the local legislation, including respecting minimum wage conditions; **supports the abolition of child labors and young workers** and favors of the abolition of discriminatory practices in employment and occupation.

The [CSR and human rights policy](#) enshrined specific commitments regarding:

- *Ethical recruitment.* Antolin establishes ethics, integrity and transparency in the recruitment, promotion, and selection processes in accordance with international, regional, and national legislation and performance standards.
- *Prevention of cruel, inhumane, or degrading treatment.* Antolin do not tolerate any type of cruel, inhumane, or degrading treatment in the workplace. The Company complies with all non-discrimination and fair treatment policies.
- *Respect for freedom of expression.* All persons forming part of Antolin have the right to express their opinions through the established consultation channels.
- *Ensuring freedom of speech* is an important part of the company's Code of Ethics and Conduct, and any situation that goes against the fundamental principles and rights of personnel and/or within the context of the companies to which this code applies must be reported.
- *Non-complicity in human rights abuses.* Preventing, detecting, and eradicating any complicit action in cases of human rights abuses, whether perpetrated within Antolin's scope of responsibility, on its behalf or for its benefit.
- *Respect of minorities, local communities, and indigenous rights.* Recognizing, respecting, and complying with international, regional, and national legislation, including the tax and urban development legislation in the countries and territories in which the company operates, as well as their culture, customs, and history.
- *Women rights.* Establishing and developing policies that integrate equality of treatment and opportunities between men and women without directly or indirectly discriminating because of sex, race, color, language, religion, opinion, origin or any other personal and/or social condition or circumstance. Antolin considers diversity, equity, and inclusion in all policies regarding people management as a cross-cutting factor that is used as the basis for all decisions taken in this area.

- *Abolition of child labor and young workers.* Combat child by respecting and promoting children's rights and young within its sphere of influence.
- *Animal welfare.* Respect the freedoms and rights of animals in compliance with the applicable regulations in force regarding animal welfare and their use in automotive components.
- *Minimum wage conditions.* Respect the right to a decent wage, ensuring equal pay for positions of equal value.
- *Value Chain.* Cascading its sustainable development commitments to the entire supply chain by applying responsibility criteria to the purchases it makes and monitors ESG risks both in its suppliers and their collaborators.
- *Extending its commitment to Human Rights to the acquisition of certain raw materials,* by collaborating with companies that share the respect for Human Rights, business ethics, fair working conditions and environmental responsibility.

2. DUE DILIGENCE PROCEDURE AND PREVENTION PRACTICES

Due diligence procedures are a key element of the entire compliance management system as they ensure that the will of the organization in enforcing its values applies to its relationships both with customers, suppliers, business partners and third parties in general (external) and with employees or members of the organization (internal).

Progress is taking place internally in due diligence on Human Rights, from a dual materiality perspective. A dual approach focused on the one side, on the promotion and development of initiatives that identify and mitigate risks for possible adverse impacts on Human Rights, directly or indirectly associated with its activity or that of its value chain. On the other, an analysis is performed on how stakeholder groups may affect the business through their assessment and determination.

In anticipation of the Corporate Sustainability Due Diligence Directive (CSDDD) Antolin is **stepping up its efforts to prepare for the new requirements and to strengthen its due diligence process** on the bases of the CHRB (Corporate Human Rights Benchmark) model specific to the automotive industry, with the following key points:

- Identification of applicable human rights based on their impact.
- Identification of potential conflicts from a prevention and management perspective.
- Raise awareness, education, and training for 100% of the workforce.
- Adherence to the Code of Ethics by 100% of the team.
- Extension of the commitment and acceptance of the Code of Conduct for suppliers by 100% of the supply chain (96% by 2026).
- Assessment of the human rights performance of direct material suppliers to reach 96% by 2026.
- Promotion of mechanisms that allow for the safe communication of any queries, information, or complaints.
- Research, processing, redress and follow-up procedures.
- Continuous monitoring as a measure for anticipating potential risks.

- Membership of the Business & Human Rights work group of the Spanish network of the UN Global Compact.
- Join the Business & Human Rights Accelerator program, promoted by the United Nations to reinforce its commitment through action, Antolin seeks to strengthen due diligence processes in respect of human rights.

Commitment in the supply chain

Effective integration of respect for human rights throughout the company requires smooth communication and close collaboration along the value chain, as suppliers play an essential role in the success of Antolin's operations.

To minimize the risks associated with the sourcing of conflict minerals —a particularly exposed area in terms of human rights protection— Antolin has a multidisciplinary and multicultural team tasked with updating its policy in this area and applying a rigorous due diligence process. This ensures responsible management of minerals and high-risk areas

Integration of human rights into risk management

Due to the nature of Antolin business and its approach to governance there is low risk of slavery and human trafficking in its business. Nevertheless, Antolin has integrated human rights into its risk management system in 2018, which allows it to establish processes and mechanisms that mitigate the potential impacts of both the company and its employees. For this purpose, the company uses the SAP GRC tool through its risk management module.

As a preventive measure, the Compliance area monitors possible incidents monthly, recording them in the risk map to guarantee traceability and reinforce Antolin's commitment in this issue.

Assessment of impact on human rights

Antolin identifies and analyses the needs that are top priority for the main stakeholders in the environment where it operates. Once it has analyzed them it considers whether these needs are aligned with the lines of contribution and the scope of action defined by the company. Similarly, with a view to possible alliances, it verifies whether the collaborating entities meet the criteria established by Antolin and assesses the positive impact on the Sustainable Development Goals.

Employee training and awareness-raising

Beyond the mandatory nature of Antolin's human rights policies, awareness-raising is key to helping interiorize commitments. To that end, training actions are combined with awareness-raising campaigns, the distribution of informative materials in the workplace, communication tools such as weekly flashes, videos, podcasts and audiobooks, as well as specific actions or programs on the issues that are most relevant to the company to detect human rights risks it faces in its daily management activity.

Alongside the innovative learning gamification project (QUIZ), online compliance portal — available 24 hours a day, seven days a week— offers additional resources to complement the knowledge of the company's professionals on human rights compliance issues.

3. Figure on 2024 Training in Compliance and Human Rights Training

Social capital	2023	2024
ETHICS AND BUSINESS CONDUCT		
MANDATORY TRAINING. On target group based on the risk approach		
COMPLIANCE AND HUMAN RIGHTS		
Online training on the Code of Ethics and Conduct, Employees trained (no.)	13,676	14,431

Free, Prior and Informed Consent (FPIC)

Despite Antolin does not operate directly in indigenous communities, each contribution programme arises from the relationship and three-way collaboration between the company, the NGOs or public-private partnerships, and the local community.

Development of human rights capabilities for local communities

Antolin's sustainable contribution model sets the basis for the stakeholder relations model. The company is a potential transformative force in the areas where it operates to build spaces of economic, social, and environmental prosperity based on ethics, transparency, and professionalism.

3. MECHANISMS FOR REDRESS

Following the detailed commitments and requirements demanded by European and local regulations to ensure ethical compliance, Antolin set up an international transparency channel (Whistleblowing) in 2010 to handle complaints regarding possible breaches, conducts or actions that are contrary to the values, commitments and principles set out in the Code of Ethics and Conduct, policies, and regulations, including those related to possible slavery and human trafficking.

The Whistleblowing or transparency channel is the official channel directly available to all Antolin employees, as well as to external people related to the company. This channel allows whistle-blowers - whether via the web or through the mail, telephone or email- to file anonymous reports, ensuring that all information received is treated with the utmost confidentiality and protection, through the intranet, the website, and a mailbox.



4. Figure on Mechanism for redress

When relationships or situations that could entail a risk are detected, the organization's supervisory mechanisms for adequate monitoring and subsequent validation go into effect

and action plans are drawn up to ensure that the company follows best practices and complies with the Antolin governance model. Independent professionals, legal advisors, human resources and external consultants may be involved in this process.

Regarding respect for human rights, 100% of the confirmed human rights complaints in 2024 (two cases of harassment and three cases in violation of respect, dignity and fair treatment in the workplace) were resolved in line with the company's objectives. All of them having been filed by Antolin employees, the complaints were addressed by the company through action plans and remedies such as: disciplinary actions, coaching and training, prevention and awareness-raising, victim support or monitoring of actions and conduct.

Note: The scope of the concept of human rights taken as reference for the reporting of the indicator was defined in accordance with the United Nations Universal Declaration of Human Rights and the Guidelines and Principles of the International Labour Organization (ILO): eradication of child labour and that of adolescents aged 16-18 years, elimination of forced or coerced labour, slavery and people trafficking, respect for healthy working hours, diversity, inclusion and non-discrimination in employment and occupation, fair, equal and non-discriminatory pay respecting minimum wage conditions, freedom of association and right to collective bargaining, and occupational health and safety management

INCREASING TRANSPARENCY and MINIMIZING RISKS within the SUPPLY CHAIN

The value chain now lies at the epicenter of regulatory action on sustainability to provide a new framework of obligations for organizations: to identify the end-to-end impacts of their supply chain with a particular focus on environmental and human rights issues.

A supply chain with shared ESG objectives

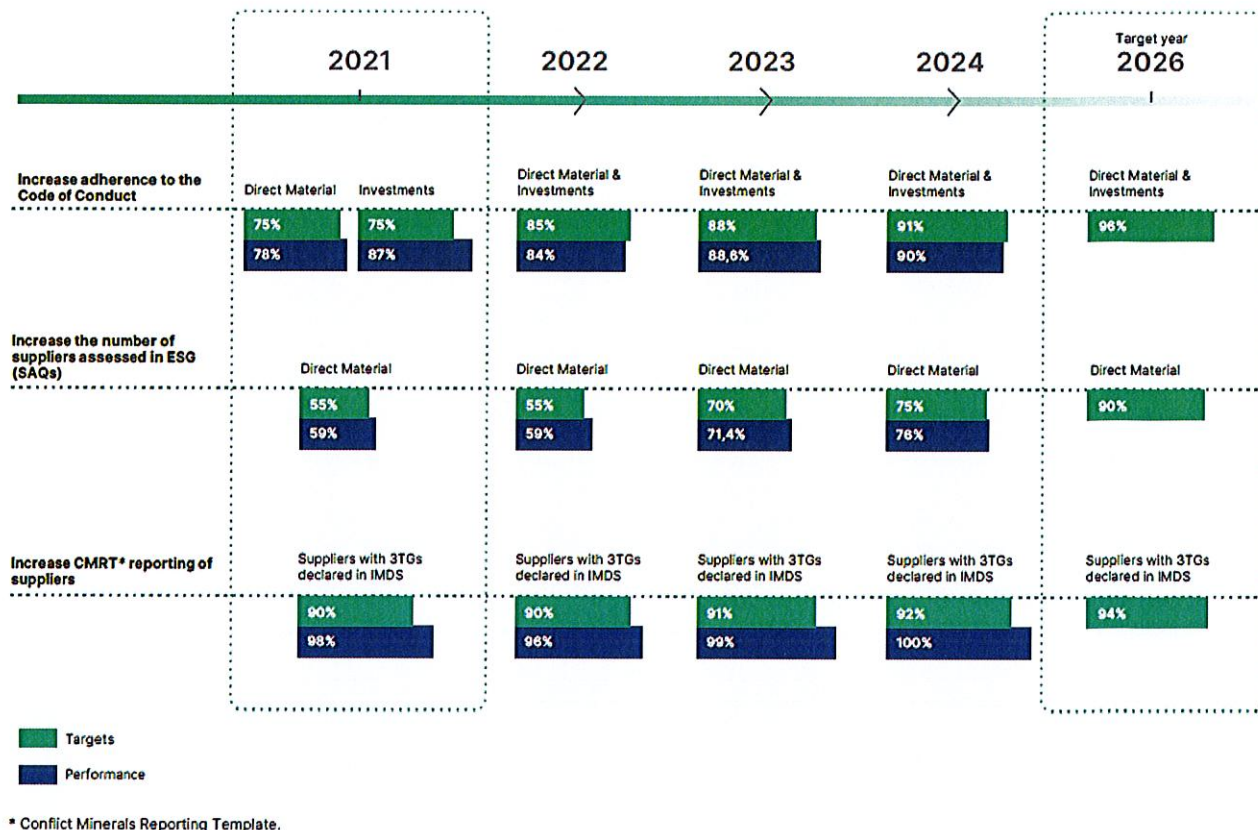
Antolin works alongside its supply chain to strengthen the positive impacts of its business and to foresee and minimize adverse effects, all with a clear purpose: to foster sustained and sustainable growth of society and to decarbonize mobility from a position of respect for and the upholding of human rights.

Based on the strategic priorities enshrined in its value creation pillars (Planet, People and Business), the company has established a series of targets for its suppliers and sub-suppliers to be also shared with their own chain:

- To be recognised as a responsible business
- To be carbon neutral
- To be a circular business
- To extend the commitments and objectives across the supply chain: to reach net zero emissions by 2050 at the latest throughout the supply chain.

Keenly aware that the development of a responsible business rests upon sharing this ambition with its suppliers, Antolin has set out requirements concerning the most critical aspects for responsible supply chain management, all under the umbrella of its ESG goals.

4. Figure on Targets and progress at 31.12.2024



Responsible supply chain management system

Antolin's relationship with its supply chain is structured based on a sustainable, robust and effective management system, which is supported by the following:

- *The Supplier Manual* which ensures that suppliers meet the standards required by Antolin, therefore satisfying its customers and key stakeholders updated in 2024.
- *The Supplier Code of Conduct.*
- *Corporate Social Responsibility and Human Rights Policy.*
- *Conflict Minerals Policy.*
- *Application of OECD due diligence for mineral supply chains in conflict-affected and high-risk areas.*
- *A procurement platform* as the optimum communication tool.
- *Commitment against modern slavery and human trafficking: Modern Slavery Statement.*
- *Whistleblowing.* A transparency channel also opens to suppliers to submit their complaints about actions or conduct contrary to Antolin's Code of Ethics and Conduct.
- *Risk management model.*

- *Self-assessment questionnaire (SAQ, for the identification, measurement, and management of risks present throughout the supply chain.*
- *Training and qualifications.*
- Roadmap for the sustainable supply chain with ESG objectives (Environmental, Social and Governance) that will enable the company to reach the goals set as part of its sustainable strategy.

Due to increasing legal and customer requirements, global competition and rising costs, Antolin updated the Supplier Manual MP01 in 2024, including obligations to be fulfilled over the life of the project.

The [Supplier Code of Conduct](#) is a commitment not only to meet prevailing domestic and international legislation, but also to abide by the Universal Declaration of Human Rights, the Conventions of the International Labor Organization (ILO), the guidelines of the Organization for Economic Co-operation and Development (OECD) and the principles enshrined in the United Nations Global Compact. As part of Antolin's comprehensive sustainability system determines the company's supplier selection and purchasing strategy. Approval and application of the Code is mandatory for all direct material and investment suppliers, which account for over 90% of Antolin's total expenditure on procurement. These requirements must also be extended to cover suppliers' providers in their respective supply chains.

Should a supplier fail to meet the minimum standards set out in the Code of Conduct, Antolin reserves the right to review the commercial relationship and apply corrective actions, in line with the associated contractual terms and conditions. There were no cases of failure to comply with the Code in 2024.

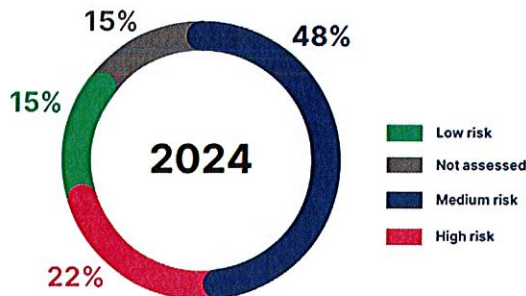
Supply chain risk management

Detecting risk as early as possible is key to making informed decisions and strengthening the company's resilience. The challenges facing Antolin are extremely changeable, as are the conditions in which it operates. The processes needed to analyze, quantify and manage supply chain risks are essential in this area.

To this end, Antolin uses two technological tools for real-time detection and early warning of risks that may impact its supply chain -Risk Radar (Sphera) and Dun & Bradstreet (D&B)- to:

- define a common risk scorecard across the company to avoid the costs of supply chain disruption,
- provide a global map detailing potential environmental, financial, social or natural-catastrophe risks with a local or global impact, among others,
- identify global ESG risks, as well as those specific to each supplier,
- define and include risk indicators as a criterion in supplier selection.

Breakdown by risk type.



In 2024, Antolin conducted 87 due diligence procedures on suppliers suspected of posing a risk, of which 15% presented a low risk. The remainder mainly presented financial risks and the corresponding mitigation measures were taken.

5. Figure on Reinforced due diligences in 2024

Monitoring of the supply chain

As part of the sustainable business objectives, Antolin plans to assess 90% of the direct material supply chain against ESG criteria by 2026. To this end, it uses the self-assessment questionnaire (SAQ), the contents of which are aligned with vehicle manufacturers' recommendations ([Drive Sustainability](#) and [Automotive Industry Action Group](#)). The SAQ updated in 2023 includes a section on "responsible sourcing of raw materials"

AIAG & Drive Sustainability's Automotive Industry Guiding Principles on Sustainability act as a guide for the sector in its commitment to excellence, innovation, transparency and sustainable performance. They include several requirements in terms of business ethics, labor conditions, human rights, health and safety, environmental leadership and due diligence for suppliers at all levels.

To comply with these principles, automotive suppliers must implement one or more management systems that help to control their operations, achieve targets and ensure continuous improvement. To validate and interpret the results, Antolin is supported by [SupplierAssurance](#), the industry benchmark recommended by AIAG. SupplierAssurance analyzes supply chain due diligence requirements in light of legislative developments; examines supplier performance on key human rights and sustainability issues; verifies the information provided; and makes recommendations on areas for improvement. The results of the SAQs are available to suppliers registered on the procurement platform, within a section called Sustainability.

All internal controls, together with the support provided to suppliers by the STAs (Supplier Technical Assurance), ensure effective monitoring of the supply chain activity based on fluid and constant communication, without Antolin having to conduct any additional internal audits. To support the foregoing, thirdparty sustainability audits focus on suppliers whose activity is more exposed to non-compliance risks, principally those associated with human rights.

In this regard, Antolin has a zero-tolerance policy against human rights violations across its supply chain. Due to the source and working conditions associated with conflict minerals, smelters are the supply chain link posing the greatest threat.

In line with OECD guidelines, Antolin has been applying the principle of vigilance and continuous improvement for some time now, including a series of initiatives that are more crucial now than ever following approval of the Due Diligence Directive.

- Publication of the updated and publicly accessible [Conflict Minerals Policy](#).
- *Appointment of the conflict minerals team*, which oversees defining the objectives, monitoring, and managing the achievement of the objectives. This is a multicultural and multidisciplinary team composed of representatives from the sustainability, procurement, sales, and global project engineering areas, all under the leadership of the sustainability area.
- Identifying and assessing the risks in the supply chain, as well as developing a system that offers a quick response to potential risks. In addition to the human rights violation risks associated with conflict minerals, other indirect risks include the non-application or inadequate application of due diligence and fraudulent reporting through the Conflict Minerals report.
- Identification of the suppliers that provide 3TG to Antolin in their products (tungsten, tantalum, tin, gold), as well as cobalt and mica, and an assessment to find out whether they comply with the objectives established in this matter.
- Membership of the **Responsible Minerals Initiative (RMI)**, an alliance that promotes the intersectoral work of the Responsible Minerals Assurance Process (RMAP). This body conducts audits of foundries and facilities in the factories that extract potentially conflicting minerals or materials.

In 2024 95% of the 190 suppliers identified as supplying products containing conflict minerals correctly submitted their Conflict Mineral Reporting Template (CMRT). Of the 531 mineral smelters present in the supply chain, 357 are eligible and 174 are currently being audited by RMAP under Responsible Minerals Initiative (RMI) criteria to determine their eligibility.

After starting to monitor the cobalt and mica supply chain in 2021, a 90% response rate was obtained in 2024 from the 125 suppliers identified as suppliers of said minerals. Of the 145 cobalt and mica smelters, 131 are eligible and 14 are currently being audited by RMAP under Responsible Minerals Initiative criteria.

Supplier training and qualifications

As part of its commitment to integrate sustainability into its entire value chain, Antolin was one of the 17 companies promoting the "Sustainable Suppliers" training program, an initiative of the Spanish Global Compact Network, the ICO Foundation and ICEX, the aim of which is to deliver sustainability training for SMEs, to recognize and share good leadership practices of sustainable supply chains. In its second year, 3,200 SME suppliers -1,952 from 50 countries- completed the training in 2024. Antolin's efforts to roll out training programs for its value chain were recognized at the first edition of CPOnet's Alcance 3.0 Awards in the "Best training and education initiative" category.

Communication with suppliers: Confidentiality and transparency

Antolin has a non-disclosure agreement (NDA) to ensure the secure exchange of information between the company and its suppliers. Compliance with this NDA is mandatory while the

supplier is registered on Antolin's procurement platform. If the information to be shared with the supplier is considered strategic, technological, or deemed delicate (strategically, technologically or for whatever other reason) an expanded NDA is activated to cover certain matters in greater depth.

In addition to confidentiality, transparency is vital to Antolin's relationship with its supply chain. To that end, the procurement platform is available publicly on the company's website, accessible to all current and future suppliers and interested third parties looking to consult the information available. The portal includes:

- Purchase terms and conditions (by country).
- Supplier sustainability (which includes the Code of Conduct and the transparency channel).
- Conflict minerals.
- EDI (electronic communication with suppliers to transmit information on logistics processes).
- Supplier portal.
- Support (where suppliers can seek all manners of assistance).
- Data security (suppliers can consult the security policy and use the channels available to report any information security issues).

6. Figure on 2024 ESG Supplier Monitoring Data

Social capital	2023	2024
SUPPLY CHAIN		
Total active tier 1 suppliers (no.)	3,098	2,956
Active tier 1 direct material suppliers (no.)	2,598	2,484
Total purchase volume from tier 1 suppliers (€K)	2,684,047	2,262,665
Purchase volume from tier 1 direct material suppliers (€K)	2,496,869	2,100,694
Purchase volume from local suppliers (€K)	1,263,417	1,071,163
Suppliers of products containing materials in conflict with declaration/certification of origin/compliant (%)	99	100
Direct material suppliers with relevant environmental, social and governance (ESG) impacts (no.)	458	456
Suppliers of direct materials assessed for their ESG performance (no.)	1,854	1,893
Suppliers of direct materials assessed for their ESG performance (%)	71.40	76.20
Panel suppliers with completed ESG self-assessment questionnaire in the last three years (no.)	2,153	2,192
Suppliers with self-assessment questionnaire answers considered "High Risk" (no.)	267	318
Production suppliers that have accepted the Supplier Code of Ethics (%)	88	90
STAs (supplier technical assistants: responsible for supplier monitoring and development) (no.)	56	51
Due diligences carried out on suppliers suspected of risks (no.)	85	87

The main source of data for 2024 Grupo Antolin Irausa, S.A.U., as parent company of Antolin, is the [2024 Integrated Report](#) including the Statement of Non-Financial Information 2024, as part of the Antolin consolidated annual accounts. The Statement of Non-Financial Information has received a favorable verification report, without qualifications, from the company KPMG about its adaptation to the content demanded by the Spanish Law 11/2018 on non-financial information and diversity and the 2021 Global Reporting Initiative standards selected. This Antolin Integrated Annual Report 2024 includes, as a new feature, the results of the double materiality assessment, carried out in accordance with CSRD regulations. It also follows the criteria of the Integrated Reporting Framework developed by the International Integrated Reporting Council (IIRC). For information where no international reporting standards exist, the company has defined the calculation and reporting methods. All the economic-financial data underpinning Antolin's information throughout the Statement have been externally audited by a third party.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act and has been approved by the Boards of Directors of Grupo Antolin-Irausa, S.A.U. on 28 May 2025.

Burgos, 28 May 2025



Cristina Blanco
CEO
Grupo Antolin-Irausa, S.A.U.