

INTEGRATED REPORT 2021



Intelligent. Integrated. Inside.

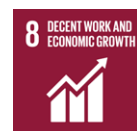


04

Conscious leadership

The value of
doing things well

Long before ethics, integrity and transparency ceased to be optional for companies, Grupo Antolin already saw these as essential. They reflect our way of understanding our place in the world and setting the pace in the industry, always hand in hand with our founding values and with the belief that responsible management is the only way to transform a company into a business creating real added value for all of society.



4.1.

What moves us:

Vision and Values

Grupo Antolin's **commitment** to society begins with the promotion of an internal culture through which principles such as respect, integrity and ethics are strengthened. That is why the company is advancing in its aim to position itself as a benchmark in the industry due to its responsible management and its values, the same ones that have guided it since its creation over 70 years ago.

VISION

Our vision for the future is to be the leading company in automobile interiors, creating value for our stakeholders.

VALUES

Our values are the pillars that define how Grupo Antolin works in a globalized, competitive and changing environment.



PEOPLE, THE KEY TO SUCCESS

- › Recognize achievements: everyone contributes to success
- › Build a climate of trust
- › Be tolerant with mistakes
- › Listen, communicate: act transparently
- › Teamwork



FAMILY SPIRIT

- › Act honestly
- › Respect others
- › Deal with issues fairly



PASSION FOR A JOB WELL DONE

- › Work with quality
- › Meet your commitments
- › Train yourself permanently
- › Be involved from the beginning



INNOVATION, FUNDAMENTAL TO OUR FUTURE

- › Be flexible and open to new ideas
- › Don't conform, encourage boldness
- › Everything can be questioned, look for the best solution



CONTRIBUTION TO THE DEVELOPMENT OF SOCIETY

- › Be committed to your environment
- › Represent the company's values in society





4.2.

What guides us:

Corporate governance

At Grupo Antolin, the promotion of the aspects of sustainability starts with the Board of Directors, setting the strategic lines for the main ESG* issues in the business

Management approach

Ethics, integrity and transparency are the three main pillars on which Grupo Antolin’s Corporate Governance is based. With the responsibility that following these three main principles implies, the company adopts sustainability criteria for each and every one of its decisions to ensure the proper functioning of its business activity, looking forward for long-term future and to respond the needs and expectations of its environment and stakeholders.

Grupo Antolin also monitors the trends that set the path in terms of governance and integrates them into its governance model, as well as extending the environmental, social and good governance requirements into the company’s strategy and the development of these criteria in the supply chain.

At Antolin, the promotion of the aspects of sustainability starts with the Board of Directors, setting the strategic lines for the main ESG issues in the business and supervising and analyzing their development. In this task, the Board of Directors has the support and advice of the Advisory Board, made up of diverse profiles with extensive experience in different sectors, as well as in the leadership and supervision of environmental, social and governance issues. The Members of the Advisory Board are directly involved in the monitoring and management of these issues through the Sustainability and Corporate Governance Committee.

To deal with the continuous market challenges and the increase in the company’s size and complexity, Grupo Antolin has chosen to professionalize its governing bodies as a way to guarantee the smooth running of the business and better decision-making.

Corporate Governance Model

Grupo Antolin’s governance and administration bodies are governed by a set of rules and principles that safeguard the smooth running of the company.

- › Articles of Association
 - › Internal Corporate Governance Rules
 - › [Vision and Values](#)
 - › [Code of Ethics and Conduct](#)
 - › [Corporate policies](#)
 - › Other internal codes, processes and procedures required or recommended through sector-related provisions
 - › The Regulations of the Board of Directors and of the Delegated Committees, which were modified at the meeting of the highest administrative body held on December 15, 2021
- › IATF 16949. Quality
 - › OHSAS 18001. Occupational health and safety
 - › ISO 45001. Occupational health and safety. 2019
 - › ISO 14001. Environment
 - › ISO 17025. Laboratory and Calibration
 - › ISO 27001. Security of information
 - › UNE 19601. Criminal Compliance
 - › ISO 37001. Anti-bribery
 - › ISO 50001. Energy efficiency
 - › Other internal processes and procedures

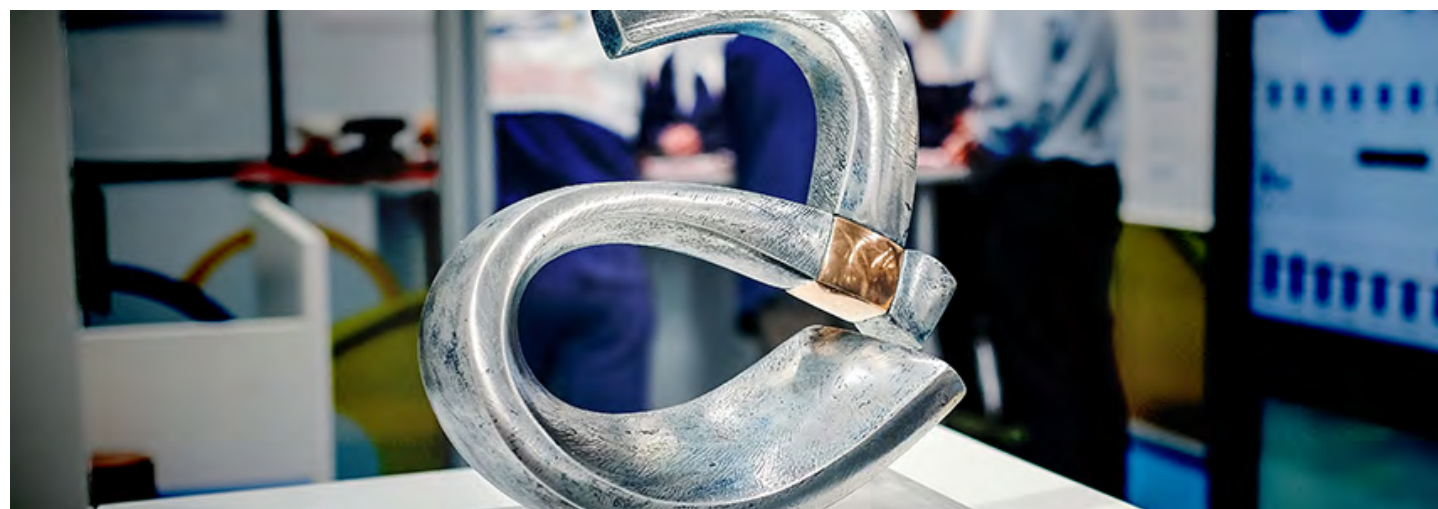
Another essential part of Grupo Antolin’s governance is its management model, comprised of a set of policies, processes, procedures, guidelines and forms designed to meet the requirements of the international management system standards and internal management needs.

Composition of the governing bodies

	Members	Men	Women	% Women	Spanish nationality
Board of Directors	5	3	2	40%	4
Advisory Board	6	3	3	50%	5
Total	11	6	5	45%	9

	Independent	Average age	Over 45 years	Average length of service in years
Board of Directors	0	56	4	14
Advisory Board	6	55	5	3
Total	6	55	9	8

*Environmental, Social and Corporate Governance



Governance of the organization

The **General Shareholders' Meeting** and the **Board of Directors** are the backbone of Grupo Antolin's governance model.

General Shareholders' Meeting

All its members belong to the Antolin family and all the shareholders are represented in it. It is therefore the company's highest decision-making body in which all its members share the same values. It met three times in 2021.

Board of Directors

This body is responsible for the governance, management, administration, strategic decision making and monitoring of the company's most important issues. The Board is made up of five members, two of whom are women, who are elected by the General Shareholders' Meeting for a renewable six-year period. Daily management is entrusted to the Chief Executive Officer and Management Committee. Ten meetings were held in 2021.

During the last year, Grupo Antolin continued making progress in aligning the Board of Directors with the best corporate governance practices, as well as working to comply with the new regulations and the implementation of the company's corporate strategy. In 2021, Miguel Ángel Vicente García was appointed as an external director, replacing Ana Berta Antolin Arribas, as representative of one of the Board's member companies.

Members of the Board of Directors

Ernesto Antolin

Chairman



María Helena Antolin

Vice-Chair



Emma Antolin

Member



Miguel Ángel Vicente

Member



Jesús Pascual

Member



Pablo Ruíz

Non-Board Member Secretary

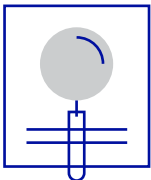
Alberto Guerra

Vice-secretary



Committees

Although all the committees retained their Chairmen in 2021, significant changes occurred in their composition with the approval of the Board of Directors meeting held on December 15, 2021. These changes will take effect in 2022. In this regard, the plan is to rotate the Chair and change the composition, duties and number of members in the different existing committees.



AUDIT COMMITTEE

4	MEMBERS	1	WOMAN
2	INDEPENDENT ADVISORY DIRECTORS	7	MEETINGS

This is chaired by an independent advisory director and it is responsible of: supervising internal control, risk management, internal financial reporting management system (FRMS) and external audit. It also works with the Sustainability and Corporate Governance Committee to analyze the management of conflicts of interest and prepare the formulation of the annual accounts and the Statement of Non-Financial Information (SNFI).



SUSTAINABILITY AND CORPORATE GOVERNANCE COMMITTEE

4	MEMBERS	2	WOMEN
2	INDEPENDENT ADVISORY DIRECTORS	7	MEETINGS

Chaired by an independent advisory director, its name was changed at a meeting of the Board of Directors held on July 22, 2021. It has powers to monitor compliance with the Corporate Governance rules, internal codes of ethics, compliance programs, environmental policies and corporate responsibility. It also supervises the Annual Corporate Governance Report and the preparing of the SNFI, in coordination with the Audit Committee.



APPOINTMENTS AND REMUNERATION COMMITTEE (ARC)

5	MEMBERS	2	WOMEN
2	INDEPENDENT ADVISORY DIRECTORS	7	MEETINGS

It deals with evaluating the remuneration policies of the company and has responsibility for nominating candidates for the Advisory Board and the Board of Directors; as well as, for analyzing candidates for senior management roles. Like the two previous committees, it is also chaired by an independent advisory director.

Advisory Board

It is a consulting body that offers advice on all those decisions corresponding to its area of responsibility, as established in the Board regulations.

Operating as a **joint committee**, it is made up of six independent advisory directors, three men and three women, who sit on different Delegated Committees. All of them have had **outstanding careers** in their respective areas and experience in leading companies and organizations. They also come from different professional backgrounds, which undoubtedly enriches their contribution as advisers to Grupo Antolin.

Under the operation of an extended Board of Directors, the members of the Board of Directors and the independent directors (without voting rights) actively and simultaneously participate in the Board of Directors meetings. The advisory directors also meet independently from the Board of Directors, in order to propose suggestions and recommendations.

The composition of the Advisory Board will be affected in 2022 by the departure of an independent advisory director, as it was agreed in December, moving to a system of five advisory directors instead of the six it had in 2021.

Members of the Advisory Board (from A-Z)

Juan de Antonio



Founder and Chief Executive Officer of Cabify

He has a degree in Telecommunications Engineering from the Polytechnic University of Madrid and an MBA from Stanford University. He is the founder of Cabify, the first Spanish unicorn, one of the most successful and recognized Spanish startups. With a clear focus on innovation and sustainability in the world of mobility and a competitive pricing policy, he has managed to differentiate and position the company in the market. He has worked as a consultant at Boston Consulting Group and was Marketing and Business Development Director at Zero Motorcycles.

Milagros Caiña



Former Director of Human Resources and Labor Relations at BMW

She has a degree in Business Administration from VWA in Hagen and was the first woman on BMW's board as Director of Human Resources and Labor Relations. Her professional career has been focused on the area of people management and social relations, performing her duties for the railway group Deutsche Bahn AG-DB Mobility Logistics, Schenker AG, in the logistics sector, and Vossloh AG.

Macarena Cassinello



Director at Siemens Gamesa Renewable Energy, Business Expert at Palfinger AG

She has a Senior Industrial Engineering degree from the School of Industrial Engineering of Barcelona (ETSEIB), a Masters in Automotion from the Polytechnic University of Catalonia (UPC) and Global Management Program (GMP) from INSEAD Business School. She started her professional career at SEAT and Nissan, where she held various positions in Spain and Europe. She then joined CNH (Fiat Group), with responsibility in the United States, Europe and Asia. She was Chief Quality Officer at IVECO until 2019 and has been a director at IVECO España and a member of the IESE I-WILL Advisory Board.

Carmen Gómez de Barreda



Independent Director of Red Eléctrica Corporación and Grupo Mutua Madrileña. Proprietary Director of Hispasat

She has a degree in Economic and Business Sciences from Comillas Pontifical University (ICADE) and a Masters in Business Management IESE (Executive MBA) from the University of Navarre and has worked for 30 years in the energy sector with responsibilities in different business groups such as Enagás, Repsol and BP Oil España. She has been Director of Oil Markets in the National Energy Commission, as well as Managing Director of the Strategic Reserves Corporation. She has also been the representative of the Spanish Delegation in the Emergency Questions Group and the Markets Group of the International Energy Agency (IEA). Independent Director of Ezentis Group until 2021, she is currently the Coordinating Director and President of the Sustainability Committee at Red Eléctrica, President of the ARC at Hispasat, as well as President of the Audit Committee at Grupo Mutua Madrileña.

Ramón Sotomayor



Independent Director at Velatia and member of the Board of Directors of Lantero Group, Levantina y Asociados de Minerales and ABE Capital Partners

He has a degree in Industrial Engineering from the University of Portsmouth an MBA from the University of Rutgers. He started his professional career at Ercross España and then joined the ThyssenKrupp Group where he held various positions, including Chief Executive Officer for southern Europe, Africa and the Middle East. He has been an advisory director at Nexus Ibérica and was a member of the Board of Directors and the Appointments and Remuneration Committee of Abengoa until November 2020. Currently he is Independent Director and Chairman of the Appointments and Remuneration Committee at Velatia and member of the Board of Directors of Lantero Group, Levantina y Asociados de Minerales and ABE Capital Partners.

Bernardo José Villazán



Director of the Chair of Connected Industry 4.0 at Comillas Pontifical University ICAI-ICADE

He has a Senior Industrial Engineering degree from Comillas Pontifical University ICAI, is a Graduate in an Advanced Business Management Program (PADE) from IESE Business School, and is qualified in Good Corporate Governance through Instituto de Consejeros Administradores (Institute of Directors and Administrators). Merit Member of the Association and College of Engineers of ICAI and Honorary Member of the Industry 4.0 Observatory. Previously, he was the President of Lucent Technologies, Independent Director and President of the Audit Committee at Laniver, and Independent Director and Chairman of the Appointments and Remuneration Committee of Telvent GIT, a NASDAQ listed company.

Main progress in 2021

Amendment of the Regulations of the Board of Directors and of the Delegated Committees.

Process to review and update the Regulations to adapt them to the latest legal changes regarding the reporting of non-financial information, as well as in relation to internal procedures regarding conflicts of interest. Adaptation of the Regulations to the composition and structural changes in the Delegated Committees.

Progress in the partial reelection of the Advisory Board.

Approval of the departure of one of the independent advisory directors with effect from January 1, 2022 and extension of the term of office for the Chairmen of the Board's Delegated Committees, moving from an annual term to biennial terms.

Self-assessment following the good governance of listed companies standards

of the operation of the Board of Directors and the Delegated Committees of the Board, according to biennial planning and under the guidance of the independent advisor who chairs the Appointments and Remuneration Committee.

Review, assessment and updating of the financial and non-financial risk map.

Among these, the catalog has been updated in coordination with Grupo Antolin's Audit Committee and Risk Committee.

Updating the organization model and risk catalog in matters of criminal compliance, extending it to all companies in Spain,

increasing the number of controls tested by 41.6%.

Through the digitalization of the reporting of required information and the automation project, the **Non-Financial Reporting Management System (NFRMS)**, relating to the main indicators in environmental, social (human resources and health and safety), ethics and compliance matters has been implemented.

Development and implementation of the Communication and Marketing Plan 2020-2021.

Launch of the **Next Generation Plan**.

Recognition of the Sustainability Department.

Alignment of the new department's structure and objectives with the company's Strategic Plan.

Stakeholder Materiality: project for customers.

Grupo Antolin's positioning in the *One Client* project.

Strategic plan. New sustainability strategic line with the definition of specific objectives and milestones in environmental, social and corporate governance matters, under the triple perspective of value contribution: Planet, People and Business.

Climate change and circular economy. Review of the strategic lines of action planned for 2021-2022.

EU Taxonomy Project. Identification of environmentally sustainable financial investments and activities in line with the eligibility criteria defined in the regulations with the aim of mitigation and adaptation to climate change, in collaboration with the firm AFI (Analistas Financieros Internacionales).

Monitoring of the action plans derived from the Climate Survey 2019-2021 focused on the material issues identified in relation to sustainability.

Preparation of the 2020 Annual Report under the

principles defined for preparing the Integrated Report, with an update in the materiality of information and methodology.

Compliance with the best practice recommendations relating to the preparation of the Statement of Non-Financial Information (SNFI)

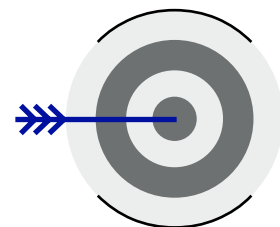
in line with the requirements established in Spanish Law 11/2018, of December 28, 2018, on non-financial information and diversity. Verification Report by a third party without qualifications.

Updating of the 2020-2021 Sustainability Master Plan

and extension to the 2022 financial year.

Review and update actions related to the **Crisis Management Manual**.





Challenges 2022

In accordance with the expert positioning analyses carried out, the key points of interest identified by institutional investors for the 2022 season for the General Shareholders' Meetings of listed companies, and which Grupo Antolin follows as a model, will be, among others:

→ Review and update the governance-related information **reporting and communication procedures** for rating or assessment agencies.

→ Self-assessment following the **good governance of listed companies standards** of the operation of the Board of Directors and the Delegated Committees of the Board, according to biennial planning and under the guidance of the independent advisor who chairs the Appointments and Remuneration Committee.

→ Development of **non-financial information** and its integrated reporting.

→ Information on corporate transactions.

→ Monitoring of the **EU Taxonomy Project**, as well as the foreseeable developments in regulatory matters regarding the content and scope of the information on environmentally sustainable economic investments and projects, within the framework of adapting the future regulation on the matter to the European framework.

→ Monitoring of the **climate change, decarbonization and circular economy targets**. Analysis of Grupo Antolin's footprint and trends.

→ Continuous adaptation of the **Sustainability Master Plan** to the expectations and needs of the market, stakeholders and the company itself.

→ Updating **new CNMV developments** regarding the best corporate governance practices of listed companies.





Management team

Grupo Antolin’s management team is made up of 271 members distributed across the 26 countries in which the company operates. Integrated into this team, Grupo Antolin’s Management Committee is formed by 15 leading professionals who have extensive experience in the automotive industry.

The Management Committee has seen a 25% increase in female representation compared to the 2020 financial year, with the appointment of a new Human Resources Director, currently representing 27% of the total members. This trend reflects the company’s commitment to promoting talent to positions of great responsibility regardless of gender or other personal circumstances.

Senior management



Ernesto Antolin Arribas
Chairman



María Helena Antolin Raybaud
Vice-Chair



Jesús Pascual Santos
Chief Executive Officer

Management committee



CORPORATE FUNCTIONS

They offer global services to the Business Units and the regions



REGIONS

They work continuously with the Business Units and provide a local vision



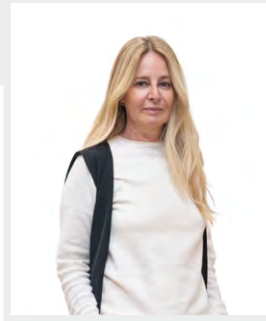
BUSINESS UNITS

Responsible for the standardization of products and industrial processes as well as the technical and industrial aspects

Corporate functions



Cristina Blanco
Corporate Finance Director



Fernanda Cardama
Organization and Human Resources Director



Juan Carlos González
Corporate Business and Technology Director



Miguel Marañón
Corporate Sales Director



Miguel Ángel Prado
Corporate Industrial Director



Pablo Ruiz
Corporate Legal Director



Javier Villacampa
Corporate Innovation Director

Business Units



Marta Cuevas
Director of the Lighting and HMI BU



Jorge Juárez
Director of the Electronic Systems BU



Pedro Santesteban
Director of the Overheads and Trunk Trim BU



Fernando Sanz
Director of the Cockpits and Doors BU

Regions



Russ Goemaere
Regional Director NAFTA



Jorge Juárez
Regional Director Asia-Pacific



Miguel Marañón
Regional Director Europe

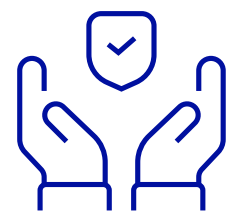
4.3.

We are setting standards: Ethics and compliance

Management approach

Leading by example is one of Grupo Antolin's hallmarks, especially in relation to full compliance and respect for all laws. This way of understanding its activity is even more deeply rooted today, if that is possible, given the global nature and complexity of the markets and the increase in the reputational risks inherent to the business and its impact on society. The company makes significant effort to generate an internal culture in which every person is a model of responsible behavior in their relationships with others.

As part of the company's **new Environmental, Social and Corporate Governance (ESG) objectives**, Grupo Antolin aspires to strengthen the added value of its business model in which it positions itself as a leader in ethics, integrity and compliance, and extend its responsible management to the entire supply chain.



Business OBJECTIVES

A benchmark in ethics, integrity, and compliance

- > **100%** of people trained in the Code of Ethics
- > A **responsible supply chain**
- > **100%** adherence to the Supplier Code of Conduct
- > **100%** of direct material suppliers assessed in ESG
- > **0** confirmed ESG complaints

Ethics and Compliance Model

As part of the company's Strategic Plan, the **Compliance Master Plan 2017-2024** sets the road map to evolve the organization's initial compliance maturity level to an optimal level by 2024. The aim is for the organization to be able to proactively identify any potential risk and provide an appropriate response.

In addition to the foregoing, it is important to note that Grupo Antolin relies on a series of tools and guides in the daily management of its activity that safeguard its ethical commitment.

CODE OF ETHICS AND CONDUCT

Cornerstone of Grupo Antolin's compliance management system and a guide for the daily behavior of all members of the organization. Compliance with this is extended to all associations with external persons or organizations.

Code of Conduct for Suppliers

Essential in the supply chain selection and assessment processes.

Whistleblowing Channel

Confidential and open to anyone inside or outside the organization.

COMPLIANCE SYSTEM

Set of policies and guides for the control and prevention of practices contrary to the legal system in the territories in which the company operates, as well as those that violate Grupo Antolin's internal regulations.

Corporate Compliance Policy

Framework to effectively define, detect and assess the risks Grupo Antolin is facing due to a potential breach of the regulations.

Anti-corruption policy

Brings together the commitments, guides and policies to fight against any conduct that may be considered an act of corruption or bribery.

Corporate Social Responsibility Policy

Guarantees responsible management of the impact of Grupo Antolin's activity on the environment and society.

Conflict of interest policy

Express declaration that guarantees the absence of conflicts of interest in Grupo Antolin's relationships with its commercial and professional environment.

Gifts and hospitality services policy

Grupo Antolin forbids the promising, offering, receiving or granting of any unjustified benefit to directors, managers, employees or collaborators of any company, business, association, foundation or organization.

Compliance guidelines: donations and contributions

Describes what the purpose of a donation or contribution should be, aligned with the sustainable contribution model established by the company.

Telematic conduct guide

New guide launched in 2021 for the proper use of information and communication technology tools in the workplace.

Committed to Human Rights

Respect for the Human Rights of everyone involved in Grupo Antolin's activity is a priority issue for the company. From a culture based on the principles of **prevention, mitigation and repair**, Grupo Antolin pursues the objective of zero violations both in its organization and in the supply chain.

Grupo Antolin closely follows the trends in this matter and meets the expectations of its stakeholders. Knowing how to listen and understand what a concept as broad as Human Rights means allows the company to anticipate the requirements, as well as integrate this commitment into all the team's decisions and actions.

Human Rights management model at Grupo Antolin

Grupo Antolin is firmly committed to a sustainable business model that combines profitability with the economic, social and environmental prosperity of society, mainly in the countries in which it operates, always considering a Human Rights approach.

1

Public commitment to Human Rights

Grupo Antolin promotes its protection and respect through the Code of Ethics and Conduct, as a guiding document and highest expression of ethics and integrity, interpreted jointly with the rest of the organization's policies that implement each of the Company's principles and commitments.

EXTERNAL REFERENCE FRAMEWORK

- ▶ Universal Declaration of Human Rights.
- ▶ United Nations Global Compact.
- ▶ Agenda 2030 on Sustainable Development.
- ▶ Guiding Principles for Companies and Human Rights.
- ▶ Children's Rights and Business Principles.
- ▶ Directive Guidelines of the OECD for Multinational Companies.
- ▶ Guidelines and principles of the International Labor Organization.
- ▶ Modern Slavery Statement.
- ▶ World Benchmark Alliance. Corporate Human Rights Benchmark Corporate (CHRB).

INTERNAL REGULATORY FRAMEWORK

- ▶ Code of Ethics and Conduct.
 - Code of Conduct for Suppliers
 - Whistleblowing Channel
- ▶ [Strategic plan: Sustainable business model. Planet, People, Business Objectives.](#)
- ▶ [Corporate social responsibility policy: Human Rights Policy.](#)
- ▶ [Conflict minerals policy.](#)
- ▶ Modern Slavery & Human Trafficking Statement.

2

Due diligence procedure

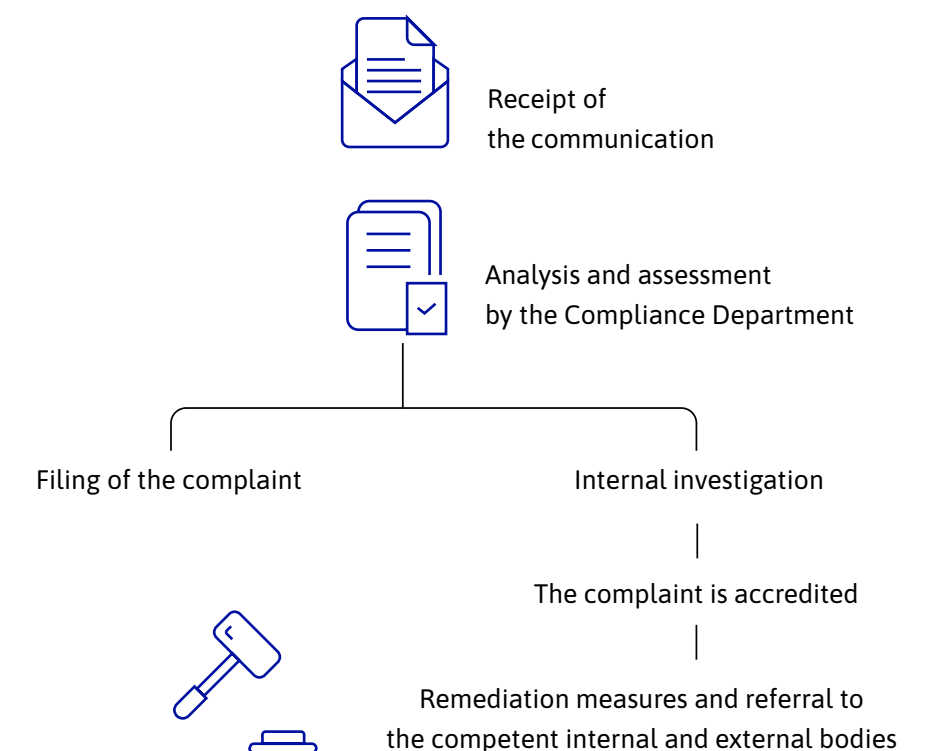
Grupo Antolin is making progress in the process from a dual materiality approach, with several key points

- ▶ Identification of applicable Human Rights based on their impact.
- ▶ Identification of potential conflicts from a prevention and management perspective.
- ▶ Awareness, education and training for 100% of the workforce.
- ▶ Acceptance of the Code of Ethics by 100% of the team.
- ▶ Extension of the commitment and acceptance of the Code of Ethics for suppliers by 100% of the supply chain.
- ▶ Assessment of the Human Rights performance of 100% of direct material suppliers.
- ▶ Promotion of mechanisms that allow for the safe communication of any queries, information or complaints.
- ▶ Research, processing, remedy and follow-up procedures.
- ▶ Continuous monitoring as a measure for anticipating potential risks.

3

Mechanisms for redress

The Whistleblowing Channel is Grupo Antolin's main complaint mechanism, available to all employees and external stakeholders.



Promoting compliance with Human Rights throughout the value chain represents one of the company's priorities for the future, even more so given that the future will bring growing risks such as technological development, accelerated urbanization in developing countries and the consequences of climate change.

In 2021, Grupo Antolin implemented different initiatives to make progress in complying with Human Rights:

- › Coaching and training for its professionals in the area of Human Rights, supported by awareness and education actions.
- › Identification of applicable Human Rights based on their impact for Grupo Antolin, supported by the methodology developed by the Corporate Human Rights Benchmark (CHRB) initiative for the automotive sector.
- › Specific training for the prevention and fight against harassment.
- › Updating of the main Human Rights violation risks linked to the automotive sector within the company's current risk classification in SAP_GRC (Risk Management module).
- › Monitoring of actions and behaviors that could involve a violation of Human Rights.

With the demands that have characterized the company since the beginning, Antolin is progressing, hand in hand with its customers, in reinforcing the promotion of diversity, respect for Human Rights and providing decent working conditions throughout the supply chain. In the United States, it actively works with the Ford Suppliers Diversity and Inclusion team in the Tier "II WIN (Widening the Inclusion Network) Program USA & the Michigan Minority Supplier Development Council", to make progress in meeting the targets set to promote procurement through minority-owned suppliers from socially or economically disadvantaged and underrepresented groups

The company has also taken part in training sessions given by the Volkswagen Group in those countries considered to be at risk where it has a presence. Another important area of action is the fight against human trafficking. At the request of Honda: Grupo Antolin has created a working group under the Human Rights in Transit initiative to take measures to combat this serious violation of Human Rights in the particularly sensitive region of North America.

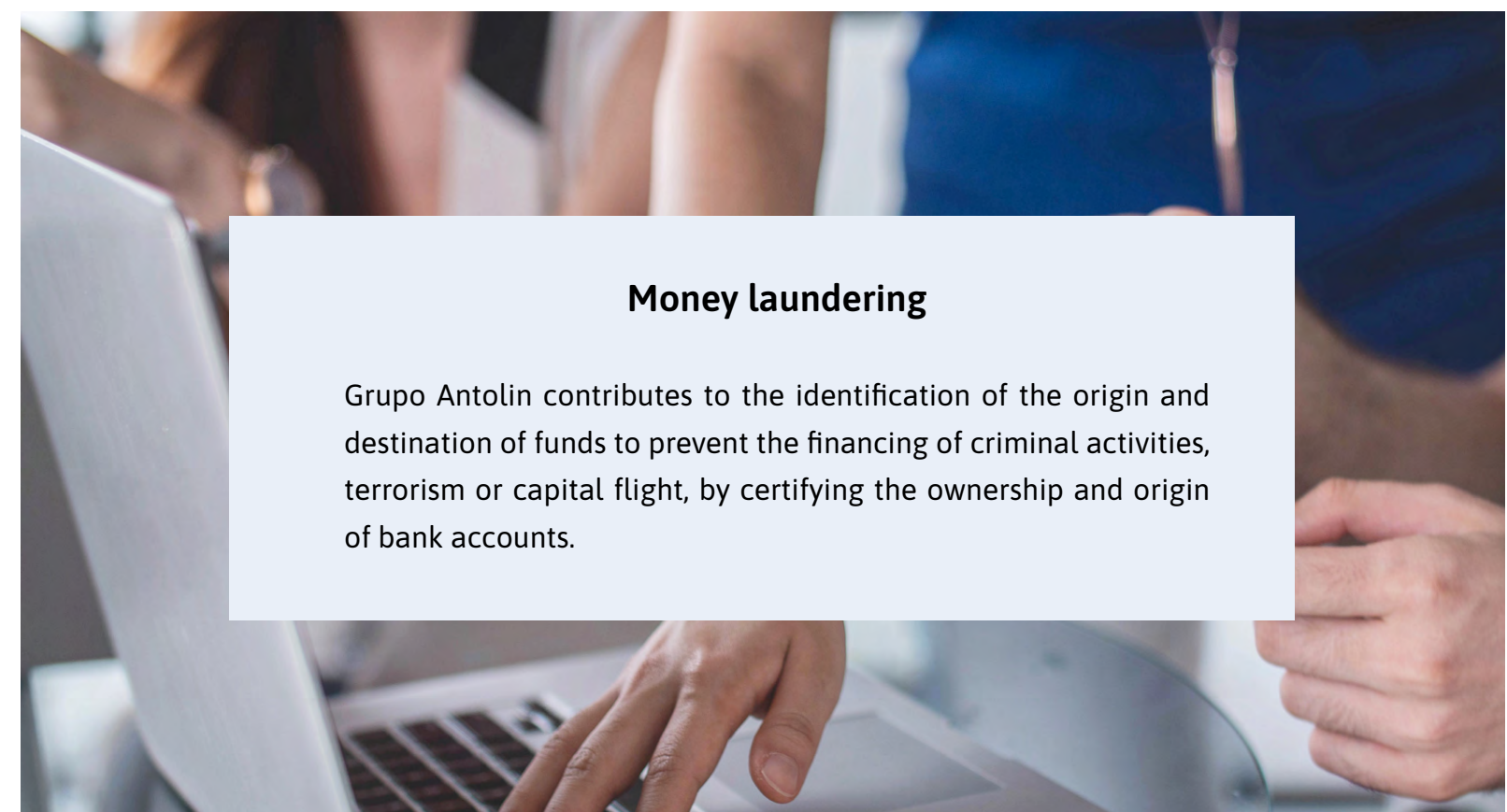
No cases of Human Rights violations were identified in 2021

Fight against corruption and bribery

Grupo Antolin promotes a zero tolerance culture against any form of bribery or corruption, be it active or passive, private or public. To do this, it has a [Global Anti-Corruption Policy](#), aligned with the main international references on corporate responsibility and anti-corruption, such as Principle Ten of the United Nations Global Compact, the recommendations of the Organization for Economic Co-operation and Development (OECD), the United States Foreign Corrupt Practices Act, and the United Kingdom Bribery Act, among others.

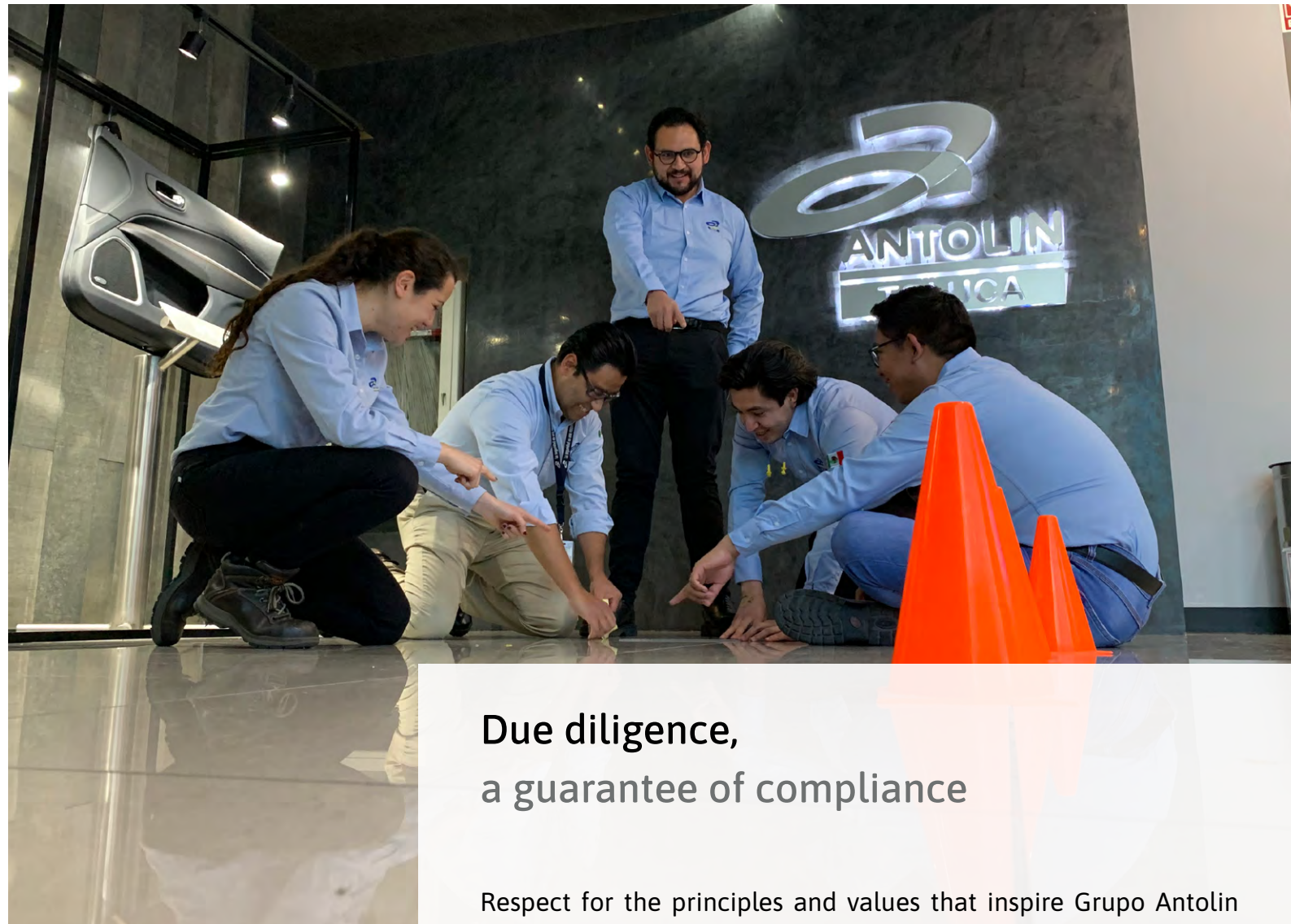
The company also constantly broadens and improves the mechanisms for detecting, correcting and reporting these abusive practices. Proof of this is the certification of the Criminal Compliance and Anti-Bribery Management Systems in accordance with the requirements of the **UNE 19601:2017** and **ISO 37001:2017 international standards**. From a financial viewpoint, Grupo Antolin has various controls implemented through the internal risk control and management system relating to financial reporting (FRMS), developed and assessed by an Internal Auditor.

Another fundamental element of this commitment is the training, educating and awareness of all its professionals. In 2021, Grupo Antolin offered its teams new courses –through its e-learning platform– on issues such as anti-corruption and conflicts of interest. The training is completed with awareness actions such as the one carried out for International Anti-Corruption Day with the publication of a statement and an information video to remind the entire organization of the importance of this zero tolerance.



Money laundering

Grupo Antolin contributes to the identification of the origin and destination of funds to prevent the financing of criminal activities, terrorism or capital flight, by certifying the ownership and origin of bank accounts.



Due diligence, a guarantee of compliance

Respect for the principles and values that inspire Grupo Antolin goes beyond scrupulous internal compliance and also concerns any external people and companies who want to be associated with the organization. That is why it considers it essential to equip itself with due diligence procedures, included within the **Compliance Management System**.

Through these procedures, the company defines, implements and manages the due diligence common to the entire workforce, to people who are in exposed positions within the organization, as well as to third parties linked to Grupo Antolin's activities (customers, suppliers and business partners).

Through the detection of those situations that may entail a risk, the **monitoring methods** defined by the organization are put into place so that they can be appropriately monitored and subsequently validated. This allows action plans to be defined that guarantee the good work of the company and compliance with the governance model.

Grupo Antolin's due diligence mechanisms apply to all of the people and entities who want to work with the organization

Managing conflicts of interest

Grupo Antolin understands a conflict of interest to be a situation that affects the level of objectivity, neutrality or independence of a person due to being unduly influenced by an interest of a personal or financial nature. To identify these cases, Grupo Antolin follows its Conflict of Interest Policy, which includes both prevention and management measures:



Procedures that prevent or control the exchange of information between professionals who participate in activities that may involve a risk, as well as a close supervision of their functions.



Training: teams are informed about the content and approval of the Conflict of Interest Policy through internal notifications.



Certification of conflicts of interest: individual and confidential declaration to be completed by a certain group, which, due to its responsibility and authority, participates in decision-making.



Establishment of a procedure and system for the segregation of functions: a tool that allows us to monitor, manage and control access.



Advice: any employee can communicate or request advice in potential situations of this type, through a private email address for Compliance or the Whistleblowing Channel.

Respect for free competition

Grupo Antolin defends free competition and believes that it has a beneficial effect on the economy as it encourages companies to be more efficient, to innovate and to constantly improve the quality of their products. In an environment where the rules of the game are clear for everyone, Grupo Antolin considers that the freedom of companies to make their own decisions offers the end customer the best options to choose the products or services that best suit their needs.

The company therefore does not allow participation in any activity that may result in a restriction of this right. On the closing date of this report, there were no pending or completed legal actions in the area of competition. In 2021, all the sales teams received training on this matter through a course given by the Compliance department on the Spanish Competition and Antitrust Act.

All claims received through the Whistleblowing Channel are processed, analyzed and assessed by the Compliance Department

Promotion of transparency

Grupo Antolin has established a culture of transparency among all of the people forming part of the company or who maintain a regular relationship with it. The key element is the [Whistleblowing Channel](#), provided to allow for the reporting of possible breaches of the Code of Conduct. The complainant (internal or external) can submit their report through the website, an email address or a PO Box. They have the option to identify themselves or do this anonymously.

All reports made through this channel are processed, analyzed and assessed by the company's Compliance Department. If the procedure continues, an internal investigation is launched. If in the end there is proof of an infringement, measures to be adopted to remedy this are proposed (disciplinary action, reporting to the authorities, system improvements or internal procedures to prevent similar situations in the future), and it is referred to the competent bodies to agree on and impose the corresponding disciplinary action.

Twenty-five complaints were received through the Whistleblowing Channel in 2021, one fewer than in the previous year. Of these, eighteen were substantiated complaints and in response there were eighteen corrective actions. One case of corruption was also recorded, which was responded to appropriately, as well as five reports in the area of Human Rights and discrimination, which were also resolved.



Responsible taxation conduct

Grupo Antolin strictly complies with **current tax regulations both nationally and internationally** in all the countries in which it operates. The corporate tax policy is integrated into the company's Corporate Governance regulations, which are approved by the Board of Directors.

All entities comprising Grupo Antolin contribute fairly to meeting public financial demands, always acting with prudence in the interpretation of the regulations and demonstrating responsibility in their application. Moreover, both in Spain and in all other countries in which it operates, the company wants to comply with, develop and implement good tax practices. And it has committed to having relationships with the Tax Authorities based on the principles of transparency, good faith and fairness.

Security of information

Respecting privacy and guaranteeing the proper processing of the information on professionals, customers and other stakeholders with whom Grupo Antolin interacts is a fundamental element for the company on which to build and retain the trust shown by them all. To do this, the Corporate Information Security Policy is integrated into Grupo Antolin's management model, which guarantees the highest standards of ethics, integrity and compliance in this matter.

The guidelines on which this protection of corporate information resources is based are:



Cyber Security and Security of Information are closely related concepts. Security of information, which encompasses management beyond information systems, including areas such as prototype management or the physical security of buildings, continues to be mostly focused on digital assets. To achieve better adherence to cyber security, in 2021, the responsibility for information security was transferred to the Corporate Information Systems Department.

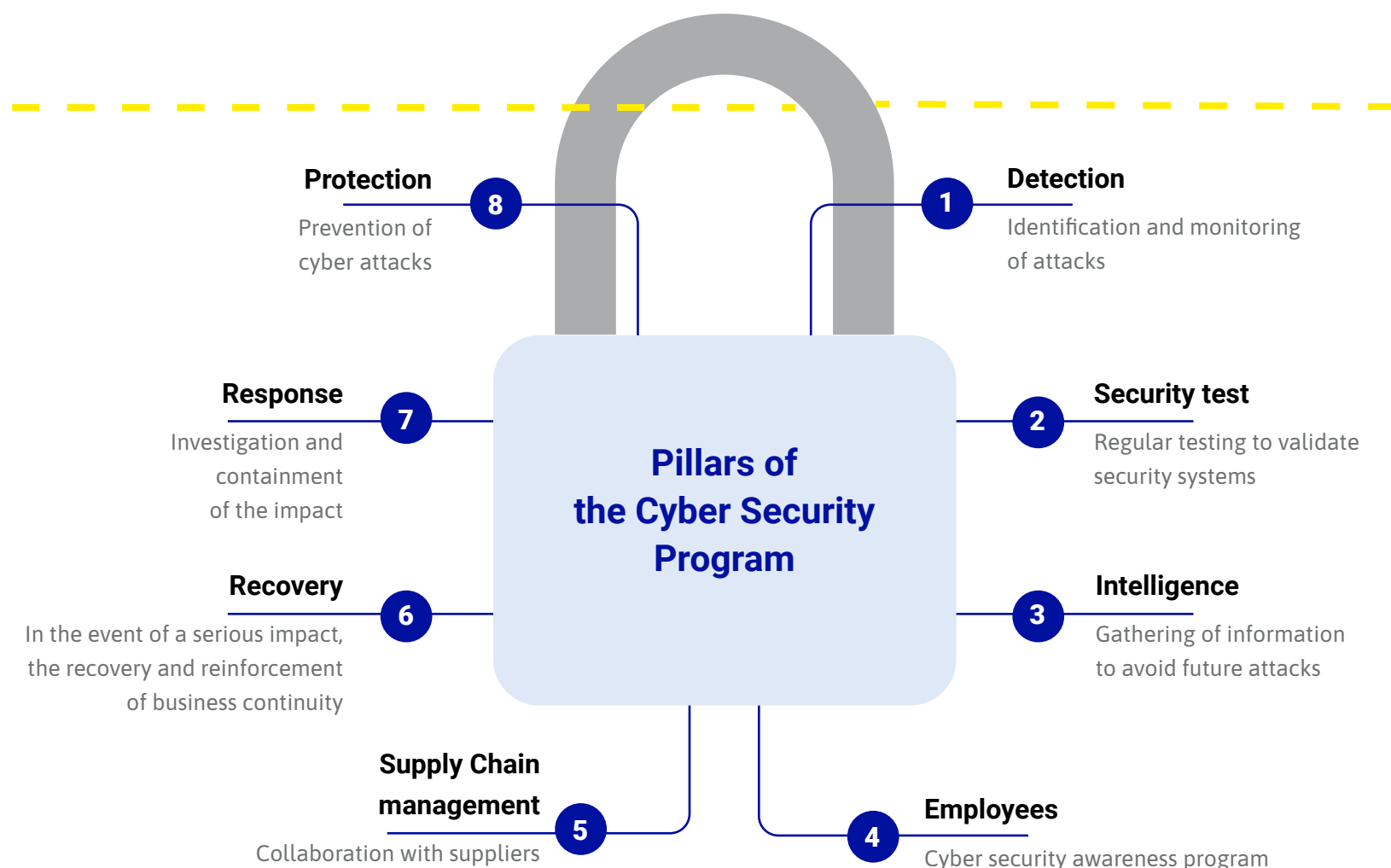
As recognition of the strength of the information security systems, it is worth mentioning the obtaining of the *Very high* label as a result of the audit by TISAX (Trusted Information Security Assessment Exchange). This, together with the ISO 27001 Audit, have been passed with no issues raised.

As a consequence of the digitalization of business activity, robotization and digital tools, driven by the effect of the pandemic, dependence on digital communication for interaction with others has multiplied. As this dependence progresses, the risk of cyber attacks increases exponentially at a company like Grupo Antolin. In this context, Antolin has defined a 360° strategy, based on eight pillars, with the aim of reinforcing the protection of the Company's assets against cyber attacks and cyber crimes.

In 2021, different notification, awareness and training actions have been carried out for the entire workforce who make digital tools their main working method. In addition to raising awareness and informing about the adverse effects of malicious communications (malware), the objective was to make it easier for the user to identify communications or interactions that could lead to potential security breaches in the system and their consequences.

In this way, the company not only commits to properly identifying data and information, but to implementing the control mechanisms required to protect them, and to using them efficiently for its legitimate business needs worldwide. This premise also applies to the management of confidential information provided by its customers.

In addition, the mobility of the future is already raising new information security challenges. As a result, Grupo Antolin is working on new technological solutions by taking into account respect for the protection and privacy of the information obtained in these developments.



Environmental and socio-economic compliance

Grupo Antolin is very happy to respond to any queries or complaints it receives on environmental, social or economic matters. The organization’s ethical and compliance conduct establishes a series of procedures to channel such communication. In 2021, no significant breaches of environmental, social-economic legislation or regulations have been identified.



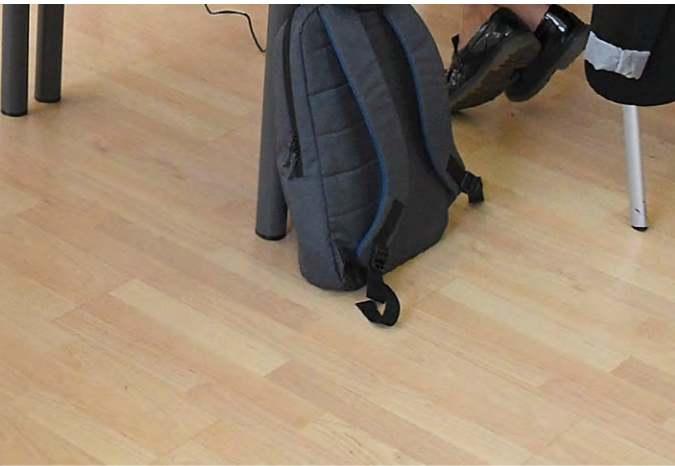
Training and awareness-rising: key factors for a compliance culture

The investment in training and awareness made by Grupo Antolin not only improves the performance, productivity and competitiveness of the company, but also offers the workforce the possibility to improve their qualifications and enhance their talent and employability. In 2021, new training modules were offered on the ‘Success Factor’ e-learning platform. These are in addition to the course launched last year on Compliance and the Code of Ethics and Conduct.

Among the new training options made available over the last year, it is worth mentioning a **training module on the prevention and combating of harassment**, to recognize the various forms of harassment, respond effectively to potential incidents and understand everyone’s role in preventing harassment and promoting respect.

Beyond this training activity, Grupo Antolin carries out awareness campaigns with posters and other information materials at the work centers, and incorporates new communication tools such as the “weekly compliance flashes” and increasingly popular formats such as videos, podcasts and audiobooks.

	Compliance and Human Rights through the Code of Ethics and Conduct online course*		Anti-corruption and Competition		Data protection and privacy		Conflict of interest and Independence**		Prevention and combating of harassment**	
	Employees	Hours	Employees	Hours	Employees	Hours	Employees	Hours	Employees	Hours
2020	6,237	5,503	1,724	1,249	501	594				
2021	6,783	5,697	1,938	1,404	588	687	1,645	1,316	3,895	2,922



*Cumulative figure since its launch in 2019 as a ratio of the target audience according to the impact of its activity.
**Launched in 2021

4.4.

Preventing and controlling risks

Management approach

Risk management is a fundamental part of Grupo Antolin's strategy and it believes that investing in its prevention and mitigation brings the company closer to its business goals in all the areas where it operates.

To this end, it has an Internal Control system that reflects some key principles:

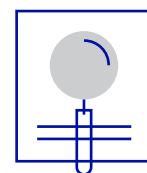
- › Managing risks across the company.
- › Ensuring compliance with the Corporate Risk Management process: identification, assessment, response, monitoring and tracking of the risks and information on them.
- › Establishing the risk levels deemed acceptable by the company.
- › Providing responses to the risks that are consistent and appropriate given the business situation.
- › Regularly reviewing the assessment of risks and the responses to them.
- › Monitoring the controls and strategies related to risk management to verify that they work.
- › Assessing the fulfillment of the activities to identify, assess, respond to, monitor and track the risks and information on them, in accordance with the latest standards.
- › Designing the information systems, internal controls and strategies for managing and mitigating risks.

The bodies involved in Grupo Antolin's risk management are:



Management Committee

Ensures the proper functioning of the Risk Management Model.



Audit Committee

Supervises and manages the company's risk control system.



Risk committee

This is made up of Grupo Antolin's Corporate Risk Manager and representatives from different organizational areas. Its functions include updating and analyzing the company's risk catalog, monitoring and recommending the development of specific action plans.

Risk catalog

Grupo Antolin has a risk catalog that contains the different types of risks identified by the company. It is updated regularly following three criteria: probability of risk occurrence, internal capacity to detect and manage the risk, and impact in the event of the detected risk materializing.

As part of the risk catalog, under non-financial risks, Grupo Antolin has included all risks that do not have a financial origin but do have a quantifiable impact on the business.

Corporate risks

- › **Strategic Risks:** related to the objectives in the Strategic Plan
- › **Operational Risks:** related to the objectives linked to the effective and efficient use of resources
- › **Reporting Risks:** related to the reliability of the supplied information
- › **Compliance Risks:** Related to compliance with laws and regulations

Specific risks

- › Corruption and money laundering
- › Human resources
- › Training
- › Health and safety
- › Environment
- › Suppliers
- › Human Rights
- › Social action and communities

Given Grupo Antolin's strong commitment to promoting sustainability, energy savings and energy efficiency, the company includes several points related to **climate change**: environmental risk, non-compliance with environmental legislation, incidents in the environmental management of production (which includes waste management) and, finally, the risk of climate change.

Risk map

In January 2021, Grupo Antolin's new risk map came into force. This is shared monthly with the Risk Committee and the Management Committee, and also regularly with the Audit Committee for its analysis and review.

In addition to what is called the 'Environment risk' being ranked in ninth place, this risk map includes new risks related to the social and economic consequences of the pandemic for Grupo Antolin, its staff, customers and supply chain.

During the second half of the year, Grupo Antolin updated the catalog of risks and their subsequent assessment. The consolidation of the risks assessed resulted in a new scorecard, which will be regularly monitored from January 2022.

Good practice

Grupo Antolin, the industrial company with the best reputation in Spain

The 2021 edition of the Merco Empresas ranking, the most prestigious corporate reputation monitor in Spain, placed Grupo Antolin among the 100 Spanish companies with the best reputation in the country; specifically, in 92nd place.

Moreover, within the ranking of the companies with the best reputation in the sector, the company achieved first place, becoming the industrial company most valued for its responsible management and its values.

Grupo Antolin has been a feature in Merco Empresas since 2014, when it entered the industrial sector ranking for the first time. For the company, this is a great recognition of its efforts to develop a sustainable business model that generates value for all its stakeholders through processes and products that are environmentally friendly and its commitment to innovation and technological development. All with the clear ambition of becoming a benchmark in the industry thanks to its responsible management and values.

SDGs IMPACTED



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