

## GENERAL SUSTAINABILITY POLICY

### PURPOSE

TUBACEX Group (hereinafter TUBACEX or the Company) is a leading multinational industrial supplier of advanced tubular solutions for the energy and mobility sectors.

Sustainability is a key element of our business strategy. It is deployed through a strategic framework and a vision focused on driving business neutrality and circularity; developing innovative solutions for the energy transition; looking after our people and nearby environment; while promoting transparency and integrity.

### LEGAL FRAMEWORK

Pursuant to Article 249 bis of the Spanish Corporate Enterprises Act, of the Royal Legislative Decree 1/2010 of July 2, 2010, approving the revised text of the Corporate Enterprises Act, the Board of Directors has the non-delegable power to define the Company's general policies and strategies.

National and international regulatory frameworks have been taken into consideration in their preparation, and in particular the Agenda for Sustainable Development and Sustainable Development Goals ("SDGs") as the main scope of application and from which the rest of the proposals, policies and strategies of the European Commission for sustainability derive.

### SCOPE

This Corporate Sustainability Policy for TUBACEX Group is applicable to all subsidiaries, partially or wholly-owned companies and commercial offices that make up the Group, as of the date of its approval.

### COMMITMENTS

This Policy represents a general framework for action, establishing the basic principles of action and commitments for the company to manage and integrate sustainable practices within the company's activities and business strategy.

TUBACEX will continue working to uphold its commitment to the different sustainability standards and initiatives. As a signatory of the UN Global Compact since 2004, TUBACEX has aligned its sustainability strategy with the different action frameworks, including but not limited to the United Nations SDGs and the different international programs derived

from this European Agenda, or those established in the UN Framework Convention on Climate Change, among others.

As a result, through this Policy, TUBACEX undertakes to continue working towards the fulfilment of its objectives in terms of sustainability based on the following pillars:

- Promote and maintain a governance model for a responsible business, which encourages and promotes mechanisms to support good practices in governance, legal compliance, ethics, and corruption and bribery prevention, seeking the strictest compliance with national and international legislation in all markets and places in which it operates.
- Uphold a continued commitment to reliability and transparency, always giving special consideration to the needs and expectations of all its stakeholders.
- Ratify our express, strict and public commitment to Human Rights, guaranteeing compliance with them. To this end, the Company will rely on international instruments to identify, monitor, prevent, mitigate, remedy or eliminate any potential impacts that its activity or related activities may have on this area.
- Facilitate responsible business through sales and contractual relationships based on the principles of transparency, truthfulness, trust and good faith.
- Maintain a close relationship with suppliers and customers in order to promote sustainable practices and extend TUBACEX's sustainability commitments to them.
- Always seek customer satisfaction by prioritizing innovation, strategic intelligence and continuous improvement processes, assessing and minimizing any impact on the environment and people.
- Promoting a safe working environment that encourages healthy practices by eliminating hazards and reducing risks associated with each position, while placing the value of human life before any other economic consideration.
- Encourage the professional development of the workforce, promoting equal opportunities, respect and non-discrimination of employees.
- Minimize environmental impact derived from TUBACEX's activity by aligning with international initiatives linked to the promotion of the circular economy and encouraging practices for energy transition and climate neutrality through the reduction and compensation of greenhouse gas emissions.

- Drive the value chain to promote respectful attitudes and to protect the environment and human rights.
- Analyze and manage the impact of the company on the communities in which it operates to identify development opportunities and create shared value through local partnerships.
- Establish and implement procedures to verify compliance with other documents included in the Company's Strategic Sustainability Framework.
- Train and raise awareness among all personnel working for or on behalf of the organization, who must strive to contribute to comply with the objectives established annually in the Global Sustainability Strategy.

**SUPERVISION AND MONITORING**

This policy was approved by the Board of Directors at its meeting of December 13, 2023, following a favourable report from the Sustainability and Corporate Governance Committee who will be responsible for monitoring it. The implementation, achievement, measurement and monitoring of the specific commitments contemplated in other derived regulations will be carried out by the heads of each affected area in each case.

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