

INTEGRATED ENVIRONMENTAL POLICY

TUBACEX Group is a multinational group with headquarters in Alava and a global leader in the supply of stainless steel and high-alloyed tubular solutions (tubes and accessories).

As a result of the commitments taken in its Sustainability Policy and Strategic Framework, TUBACEX Group has drawn up this Integrated Environmental Policy with the aim of defining more specifically its environmental commitments, and particularly those associated with issues considered material for its activity. These commitments will provide a framework for the organization's environmental goals.

SCOPE

This Policy applies to all subsidiaries, facilities and commercial offices that make up the Group, as of the date of its approval.

COMMITTED TO ENERGY TRANSITION AND CLIMATE CHANGE

TUBACEX Group, aware that climate change is one of the most urgent challenges of our time and maintaining energy transition promotion as a key priority, undertakes the following commitments:

- Measure and reduce the carbon footprint in all its activities by working to achieve climate neutrality by 2050.
- Improve energy performance particularly based on innovation and efficient energy management and use.
- Promote the use of renewable energy and decarbonization of energy sources used.
- Participate in cutting-edge initiatives to contribute to the energy transition.

COMMITTED TO ENVIRONMENTAL PROTECTION

Moreover, TUBACEX Group recognizes the importance of the environmental impact caused by industrial activities and therefore, embraces the specific commitment to protect the environment and prevent pollution, contributing to avoid, mitigate and remedy any impact derived from any activity that may pollute water, soil or the atmosphere, through the following measures:

- wastewater and atmospheric emissions treatment systems that guarantee compliance with and exceed local environmental standards, without causing significant damage to the public water and the atmosphere; and
- Protection and prevention of soil contamination through proper management of hazardous products and waste.

COMMITTED TO CONTRIBUTE TO THE CIRCULAR ECONOMY

With the aim of establishing a framework to promote the circular economy and integral use of the entire production process, TUBACEX Group is committed to:

- Encouraging circularity by increasing as much as possible the use of recycled materials and promoting the reuse, recovery and recycling of waste throughout its value chain;
- Minimizing as far as possible the generation of any type of waste, while avoiding generation at source.

COMMITTED TO RESPONSIBLE CONSUMPTION OF NATURAL RESOURCES

As part of the TUBACEX Group's commitment to responsible consumption and efficient resource management, the following obligations are established:

- Implement the necessary measures to improve efficiency in the use of raw and auxiliary materials.
- Preserve and make responsible use of available natural resources and in particular, water consumption.

COMMITTED TO BIODIVERSITY AND ECOSYSTEM PROTECTION

Aware of the importance of biodiversity for the health of the planet, TUBACEX Group commits to its protection and preservation through the implementation of measures that minimize the impact of industrial activity on the ecosystems in which it operates. Likewise, it is committed to extending these national or international biodiversity protection requirements to the value chain.

Therefore, any change in TUBACEX's activities that may have an impact on this issue will be taken into account to be assessed and to implement measures to mitigate it.

The principles of action in this context shall always follow the mitigation hierarchy whereby potential or real, direct or indirect impact caused by TUBACEX's activity, and its value chain will be avoided, minimized, repaired and compensated.

TUBACEX Group has a series of measures and tools in place to ensure the **continuous improvement of environmental performance** and an adequate and effective deployment of the above commitments:

- Compliance with legal and other voluntary requirements: TUBACEX endeavors to strictly comply with all related laws and regulations and other voluntary requirements subscribed in the regions where it operates, and even to exceed such standards whenever possible.
- Efficiency in processes: permanently seeking to optimize industrial processes with a focus on improving environmental performance. In addition, the best available technologies and advanced practices in these matters are rolled out to minimize environmental impact without compromising the quality of manufactured products.
- Measuring and monitoring: including transparency and reporting on all commitments defined in this policy, through periodic indicators and annual publication of the Sustainability Report.
- Education and awareness: training for all TUBACEX employees on the importance of contributing to the commitments defined in this policy and the implementation of good practices and associated measures.
- Collaboration with stakeholders: working closely with suppliers and customers to promote sustainable practices and extend these commitments to the entire value chain.

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