

HUMAN RIGHTS POLICY

PURPOSE

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

TUBACEX believes one of its main responsibilities is to respect Human Rights, avoiding and preventing any violation. As a result, the Company is fully committed to observing them and recognizes the role it plays in the protection of people's rights and freedoms.

LEGAL FRAMEWORK

Pursuant to Article 249 bis of the Spanish Corporate Enterprises Act, 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. Thus, as a participant in the UN Global Compact, TUBACEX supports the Ten Principles on Human, Labor, Environmental and Anti-Corruption standards; the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights; and the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO). The Company strives to adhere to the principles established in these standards, aligned with those applicable to TUBACEX and to comply with all applicable laws, wherever it operates.

SCOPE

This general policy applies to all subsidiaries, partially or wholly-owned companies and commercial offices that make up the Group, as of the date of its approval.

Likewise, it is applicable to all activities and business functions performed by TUBACEX and its employees.

COMMITMENTS

This policy represents TUBACEX's commitment to develop an organizational culture that implements a policy supporting internationally recognized human rights and avoid any involvement in potential human rights violations.

Human rights are understood as all those contained in international standards, including, but not limited to the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

In particular, TUBACEX acquires the following commitments:

- The abolition of child labor, complying with all laws regulating the minimum working age. If applicable, the Group's standards will prevail over local legislation regarding the minimum working age, as long as they are beneficial to and guarantee better compliance with this commitment.
- Prohibit the use of forced labor and exploitative working conditions
- Avoid causing or contributing to an adverse impact on human rights through its own activities
- Address any impact on human rights and fundamental freedoms of individuals should they occur
- Prevent or mitigate adverse impact on human rights directly or indirectly related to its operations, products, services or activities
- Eliminate discrimination in recruitment and employment and promote occupational health and safety in accordance with the commitments taken in the Diversity, Equality and Inclusion Policy and in the Occupational Health and Safety Policy, respectively.
- Guarantee the right to equal pay for work of equal value, also set out in the Diversity, Equality and Inclusion Policy
- Uphold the freedom of association and the effective recognition of the right to collective bargaining
- Guarantee the elimination of inhuman or degrading treatment and harassment.

To achieve these commitments, the Company will continue to implement internal assessment processes to identify, mitigate and correct any situation that may pose a risk in terms of Human Rights.

The commitments included in this Policy shall be incorporated and communicated to all TUBACEX employees to ensure their effective compliance, as well as to all other stakeholders.

APPROVAL & 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.

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Author	Sustainability Director	
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