

GENERAL POLICY FOR THE DEVELOPMENT, APPROVAL, MODIFICATION, DISSEMINATION AND CUSTODY OF INTERNAL REGULATIONS

INTRODUCTION

The Code of Conduct of the TUBACEX Group (hereinafter "TUBACEX" or "the Company") constitutes the basis of its Criminal Risk Organization and Management Model. It establishes the set of general ethical principles that should govern the conduct of all members of the organization, principles that are developed through the corresponding General Policies, Area Regulations, Procedures and other internal regulations.

GENERAL POLICIES are regulations that develop general principles that provide basic guidelines on the behaviour that TUBACEX expects from itself and from all those who are part of the organization.

AREA REGULATIONS are those that regulate issues specific to a particular area of the organization, setting out the basic guidelines to which the organization and all its members must adhere in relation to a given issue or activity.

PROCEDURES are regulations that detail the way in which certain activities should be carried out, establishing behavioural guidelines that affect the regular activity of the members of the organization.

The purpose of this GENERAL POLICY is to regulate the process of preparation, approval, modification, disclosure and custody of all internal regulations generated by the Company in order to promote an orderly development of regulations that avoids any difficulties, inconsistencies and contradictions that could result from an uncontrolled proliferation of regulations.

PREPARATION AND CONTENT

GENERAL POLICIES: As part of its work of monitoring and verifying the organization and criminal risk model, the Compliance Directorate must periodically assess the adequacy and effectiveness of the General Policies in force. In this context, in coordination with the different areas, it may propose the approval of new General Policies or the updating of existing ones to the Board of Directors, through the corresponding committee. The different areas may also propose the approval or updating of other General Policies they

deem necessary through their directors. By way of example without limitation, the book of minimum General Policies to be maintained by the Company is included as an Annex.

AREA REGULATIONS: It is the responsibility of each Area Management to assess the need to generate specific policies or regulations in areas within their competence, and they are also responsible for their preparation.

PROCEDURES: In compliance with its obligation to promote the drafting of the regulations that are necessary for the development of the Criminal Risk Organization and Management Model and the Code of Conduct, the Compliance Directorate shall also be responsible for identifying the internal regulations that need to be drafted for a better definition of the necessary guidelines for action in the Company's normal activity. All members of the Organization must collaborate with the Compliance Directorate in identifying the regulations that may need to be developed or updated.

Without prejudice to the fact that the drafting of regulations of a lower level than the General Policies is assumed by the heads of the corresponding areas, the Compliance Directorate will coordinate the entire process until their approval, in order to guarantee the coherence of the entire internal regulatory system.

The different areas may also draw up regulations of a lower level than the Procedures, such as Manuals, Instructions, Protocols or Internal Regulations on more specific aspects of their activities.

The Company's General Policies should have a homogeneous structure, as should the Area Regulations as far as possible, and it is recommended that they include at least the following provisions:

- Purpose or objectives of the new regulation.
- Regulatory framework supporting the need for its enactment or issue.
- The scope of application of the regulation, which should indicate whether it applies to the entire organization or to a specific part of it.
- The specific obligations or action guidelines that are established.
- Identification of those responsible for the supervision and monitoring of the regulation.

In any case, the same corporate formats and coding system must be used, including version control with the following minimum content:

Current version	<i>1.0</i>	
Version history	Date	Version
	December 12, 2023	<i>1.0</i>
Author	Compliance Directorate	
Approved by		
Approval date		

APPROVAL OF POLICIES AND PROCEDURES

The determination of the Company's general policies and strategies is legally attributed to the Board of Directors as a non-delegable power, and it is therefore responsible for the approval of the General Policies.

The Chief Executive Officer is responsible for approving the area regulations, at the proposal of the Management of the Area responsible for their preparation.

As a general rule, procedures and other internal regulations must be approved by the Chief Executive Officer at the proposal of the Management of the Area responsible for their preparation or, failing that, by the Compliance Director. However, those that affect or have been prepared by a single area of the company may be approved by the Corporate Management of the Area in question.

FILING, PUBLICATION AND DISSEMINATION OF POLICIES AND PROCEDURES

The Compliance Directorate shall keep an updated record of all General Policies, Area Regulations and Procedures in force at any given time. The book of General Policies must be published on the corporate website.

In addition to the Code of Conduct, the policies in force and all those internal regulations that the Compliance Directorate considers require general knowledge due to their relevance, shall also be published on the Corporate Intranet.

Likewise, the Compliance Directorate shall assess the possible publication of manuals or compendiums containing the regulations in force at any given time, in order to facilitate and foster their knowledge and application.

Current version	<i>1.0</i>	
Version history	Date	Version
	December 12, 2023	<i>1.0</i>
Author	Compliance Directorate	
Approved by	Board of Directors	
Approval date	January 25, 2024	

ANNEX I**GENERAL POLICY BOOK**

- Crime prevention
- Corporate Governance
- Conflicts of interest
- Related-party transactions
- Anti-corruption
- Acceptance of gifts and hospitality to third parties
- Due diligence in partner control
- Information security
- Personal Data Protection.
- Claims channel management
- Corporate tax
- Risk management and control
- Shareholder remuneration
- Board of Directors Remuneration
- Senior Management Remuneration
- Selection of candidates for board members
- Communication with shareholders and investors
- Procurement and auditor relations
- Sustainability
- Human Rights