Tubacex

2024 CDP Corporate Questionnaire 2024

Word version

Important: this export excludes unanswered questions
This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.
Terms of disclosure for corporate questionnaire 2024 - CDP

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01/08/2025, 10:34 am

Contents

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☑ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☑ EUR

(1.3) Provide an overview and introduction to your organization.

(1.3.2) Organization type

Select from:

☑ Publicly traded organization

(1.3.3) Description of organization

TUBACEX is a premium stainless-steel manufacturer of tubular solutions for the energy sector. Founded in 1963, it is the world's largest producer of seamless tubes in stainless steel and high nickel alloys. Based in Spain, it is one of the few companies with a fully integrated production model, with total control of every step from steel casting to the manufacture of tubes and pipes and their subsequent distribution and sale. TUBACEX counts with 24 manufacturing facilities in Spain, Austria, the USA, Italy, India, Thailand, Saudi Arabia, Norway, Canada, Singapore, UAE, Guiana and Kazakhstan together with a global distribution network (TSS) as well as sales offices located around the world in 38 countries. The main sectors of demand for the tubes manufactured by TUBACEX are the oil and gas, petrochemical, chemical and energy industries. It also directs part of its production to the mechanical, aerospace, food, water desalination, electronics, capital goods and new technologies industries, among other sectors of activity. In 2015 TUBACEX created Tubacex Service Solutions, with service centres in the main business hubs to boost its distribution channel. In 2020 the company added new warehouses in Pennsylvania, USA (TSS PA) and Norway (TSS Norway), in addition to the logistics centres of Amega West, company acquired by the NTS Group in 2020. One group of leading companies: · TUBACEX TUBOS INOXIDABLES. TTI– S.A.U. is a subsidiary of TUBACEX S.A., which manufactures exclusively seamless stainless steel and nickel alloy tubes and pipes. · ACERALAVA (Acería de Álava S.A.U.), part of the Tubacex Group, is a Stainless-Steel Mill that manufactures high quality stainless steels [Martensitic, Austenitic, Superaustenitic, Duplex and Superduplex and high nickel Alloys]. The company supplies premium billets for Tubacex Seamless Tube&Pipe manufacturing mills and is also a key player in the Market supplying premium Ingots, Billets and Round bars to key sectors such as Oil & Gas, Power Generation and Chemical. · SALEM TUBE Inc. is a subsidiary with industrial

facilities in Greenville (Pennsylvania), which manufactures cold-drawn seamless tubes in stainless steel and high-nickel alloys and superalloys. - TUBACEX DURANT. TUBACEX Durant, located in Durant, Oklahoma, is TUBACEX America's newest manufacturing facility. Durant began production in 2019. Working in conjunction Salem facility, the Durant mill offers an extensive portfolio of high-performance tubing and corrosion-resistant alloys. In addition to producing standard straight-length tubes, Durant specializes in the manufacturing of coiled tubes. · SCHOELLER BLECKMANN GmbH (SBER), with industrial facilities in Ternitz (Austria), is a company created in 1840 and joined the TUBACEX Group in 1999. This plant manufactures hot-finished and cold-rolled tubes and has a production plant for umbilical tubes. · IBF. IBF S.p.A. located in north of Italy is a leading manufacturer of high alloy stainless steel tubes and special fittings of large dimensions. · TUBACEX INDIA. Located in Umbergaon (India) manufactures cold finished tubes and pipes. The company is able to deliver tubes up to 28 m (length), straight and U-Shape. · AWAJI STAINLESS started its activity in 1987. In January 2017, it became part of TUBACEX. The manufacturing plant is located in SAMUT PRAKAN, south of Bangkok. Awaji Stainless is specialized in the manufacture of stainless-steel accessories, complementing the range offered by IBF and TTA. · TUBACEX SERVICE SOLUTIONS (TSS). TSS operates as a "master distributor" of seamless stainless-steel tubes for the domestic and international market. It has the largest stock of stainless-steel tubes in the Spanish market and one of the largest in Europe. · TUBACEX TAYLOR ACCESORIOS S.A.U. (TTA), Head Office and manufacturing plant located in Artziniega (Alava) Spain, manufactures Seamless butt-welding fittings. This mill complements the activity of the Group in the Oil and Gas field and could provide for a full range of fittings within a unique package by adding products of the rest of fitting manufacturers of the Group (Caps, Tees, etc.). · TUBACEX SERVICES devoted to service and customized solutions applied to steel products. · TUBACOAT S.L., is devoted to engineering and industrial development of customized innovative coatings applied to long steel and nickel alloy products providing longer life cycle to the refining petrochemical processing units. · TUBACEX UPSTREAM TECHNOLOGIES is a service company created in 2016 specialized in manufacturing, repair and maintenance of stainless-steel machined components for the Oil & Gas industry. · NTS Amega Global has 11 locations on 4 continents across the globe (Norway, Saudi Arabia, UAE, Canada, Singapore, Guyana, Midland, Alaska, Oklahoma, Houston and Broussard) It is a company specialized in precision manufacturing, rental, and repair solutions for the Oil&Gas industry.
[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/30/2023

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:

☑ Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:

☑ Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:
☑ 4 years

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:
☑ 4 years

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:
☑ 4 years
[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

852400000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: ☑ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

ES0132945017

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No
[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply
☑ India
☑ France

☑ Italy
☑ Spain
☑ Brazil
☑ Canada
☑ Singapore
☑ Kazakhstan
☑ Saudi Arabia
☑ United Arab Emirates
☑ United States of America
☑ Guyana
☑ Norway
☑ Austria
☑ Thailand

(1.8) Are you able to provide geolocation data for your facilities?

	Are you able to provide geolocation data for your facilities?
	Select from: ☑ Yes, for all facilities

[Fixed row]

(1.8.1) Please provide all available geolocation data for your facilities.

Row 1

(1.8.1.1) Identifier

ACERÍA DE ÁLAVA, S.A.U.

(1.8.1.2) Latitude

43.034558

(1.8.1.3) Longitude

-3.003234

Row 2

(1.8.1.1) Identifier

IBF-FITTINGS DIVISION

(1.8.1.2) Latitude

45.493568

(1.8.1.3) Longitude

9.62647

Row 3

(1.8.1.1) Identifier

IBF-PIPES DIVISION

(1.8.1.2) Latitude

45.493568

(1.8.1.3) Longitude

8.951819

Row 4

(1.8.1.1) Identifier

NTS - BROUSSARD

(1.8.1.2) Latitude

30.164806

(1.8.1.3) Longitude

-91.975412

Row 5

(1.8.1.1) Identifier

NTS - HOUSTON

(1.8.1.2) Latitude

29.98812

(1.8.1.3) Longitude

-95.37539

Row 6

(1.8.1.1) Identifier

NTS - ODESSA

(1.8.1.2) Latitude

31.87

(1.8.1.3) Longitude

-102.26

Row 7

(1.8.1.1) Identifier

NTS - OKLAHOMA

(1.8.1.2) Latitude

35.347974

(1.8.1.3) Longitude

-97.440582

Row 8

(1.8.1.1) Identifier

NTS Amega - UAE

(1.8.1.2) Latitude

24.968676

(1.8.1.3) Longitude

55.07381

Row 9

(1.8.1.1) Identifier

NTS AMEGA ATLANTIC, INC

(1.8.1.2) Latitude

6.77422

(1.8.1.3) Longitude

-58.1507

Row 10

(1.8.1.1) Identifier

NTS AMEGA WEST SINGAPORE PTE LTD.

(1.8.1.2) Latitude

1.453057

(1.8.1.3) Longitude

103.803796

Row 11

(1.8.1.1) Identifier

NTS AMEGA WEST USA, INC

(1.8.1.2) Latitude

43.298259

(1.8.1.3) Longitude

-2.870967

Row 12

(1.8.1.1) Identifier

NTS MIDDLE EAST, FZCO

(1.8.1.2) Latitude

24.968791

(1.8.1.3) Longitude

55.074109

Row 13

(1.8.1.1) Identifier

NTS ROCKET CANADA, LTD.

(1.8.1.2) Latitude

53.29343

(1.8.1.3) Longitude

-113.52823

Row 14

(1.8.1.1) Identifier

NTS SAUDI, LLC

(1.8.1.2) Latitude

26.240502

(1.8.1.3) Longitude

49.986436

Row 15

(1.8.1.1) Identifier

PROMET, AS

(1.8.1.2) Latitude

58.933371

(1.8.1.3) Longitude

5.603808

Row 16

(1.8.1.1) Identifier

SALEM TUBE, INC

(1.8.1.2) Latitude

41.35583

(1.8.1.3) Longitude

-80.409703

Row 17

(1.8.1.1) Identifier

SCHOELLER BLECKMANN EDELSTAHLROHR, GmbH

(1.8.1.2) Latitude

47.711468

(1.8.1.3) Longitude

16.038525

Row 18

(1.8.1.1) Identifier

TSS DO BRASIL COM. E DISTRIB. DE TUBOS E AÇOS ESPEC., LTDA

(1.8.1.2) Latitude

-23.590388

(1.8.1.3) Longitude

-46.877817

Row 19

(1.8.1.1) Identifier

TSS NORWAY, AS

(1.8.1.2) Latitude

58.893236

(1.8.1.3) Longitude

5.738555

Row 20

(1.8.1.1) Identifier

TUBACEX AMERICA INC.

(1.8.1.2) Latitude

29.84742

(1.8.1.3) Longitude

-95.579068

Row 21

(1.8.1.1) Identifier

TUBACEX AWAJI THAILAND, Ltd.

(1.8.1.2) Latitude

13.58466

(1.8.1.3) Longitude

100.64948

Row 22

(1.8.1.1) Identifier

TUBACEX DURANT, INC

(1.8.1.2) Latitude

33.967799

(1.8.1.3) Longitude

-96.369406

Row 23

(1.8.1.1) Identifier

TUBACEX IBF KAZAKHSTAN

(1.8.1.2) Latitude

47.104282

(1.8.1.3) Longitude

51.914328

Row 24

(1.8.1.1) Identifier

TUBACEX INNOVACIÓN, SL

(1.8.1.2) Latitude

43.298259

(1.8.1.3) Longitude

-2.870967

Row 25

(1.8.1.1) Identifier

TUBACEX LOGISTICS, S.A.

(1.8.1.2) Latitude

43.034558

(1.8.1.3) Longitude

-3.003234

Row 26

(1.8.1.1) Identifier

TUBACEX SERVICE SOLUTIONS AUSTRIA, GmbH

(1.8.1.2) Latitude

47.711468

(1.8.1.3) Longitude

16.038525

Row 27

(1.8.1.1) Identifier

TUBACEX SERVICE SOLUTIONS FRANCE, S.A.S.

(1.8.1.2) Latitude

45.674145

(1.8.1.3) Longitude

5.108891

Row 28

(1.8.1.1) Identifier

TUBACEX SERVICE SOLUTIONS INDIA, Pvt. Ltd.

(1.8.1.2) Latitude

23.03397

(1.8.1.3) Longitude

70.13414

Row 29

(1.8.1.1) Identifier

TUBACEX SERVICE SOLUTIONS MIDDLE EAST, FZCO

(1.8.1.2) Latitude

24.926895

(1.8.1.3) Longitude

55.0546

Row 30

(1.8.1.1) Identifier

TUBACEX SERVICE SOLUTIONS S.A.U. - AMBROSERO

(1.8.1.2) Latitude

43.421836

(1.8.1.3) Longitude

-3.533593

Row 31

(1.8.1.1) Identifier

TUBACEX SERVICE SOLUTIONS S.A.U. - AMURRIO

(1.8.1.2) Latitude

43.034854

(1.8.1.3) Longitude

-3.001401

Row 32

(1.8.1.1) Identifier

TUBACEX SERVICES, S.L.

(1.8.1.2) Latitude

43.397732

(1.8.1.3) Longitude

-3.744331

Row 33

(1.8.1.1) Identifier

TUBACEX SERVICIOS DE GESTIÓN, SL

(1.8.1.2) Latitude

43.298259

(1.8.1.3) Longitude

-2.871001

Row 34

(1.8.1.1) Identifier

TUBACEX TAYLOR ACCESORIOS, S.A.U.

(1.8.1.2) Latitude

43.123175

(1.8.1.3) Longitude

-3.119199

Row 35

(1.8.1.1) Identifier

TUBACEX TUBES AND PIPES

(1.8.1.2) Latitude

20.180636

(1.8.1.3) Longitude

72.776618

Row 36

(1.8.1.1) Identifier

TUBACEX TUBOS INOXIDABLES, S.A.U. - AMURRIO

(1.8.1.2) Latitude

43.037083

(1.8.1.3) Longitude

-3.000199

Row 37

(1.8.1.1) Identifier

TUBACEX TUBOS INOXIDABLES, S.A.U.- LLODIO

(1.8.1.2) Latitude

43.135584

(1.8.1.3) Longitude

-2.968355

Row 38

(1.8.1.1) Identifier

TUBACOAT, S.L.U.

(1.8.1.2) Latitude

43.298259

(1.8.1.3) Longitude

-2.871001
[Add row]

(1.20) Which parts of the steel value chain does your organization operate in?

Select all that apply
☑ Electric arc furnace operations
☑ Hot rolling
☑ Cold rolling and finishing
☑ Scrap steel recycling
☑ Other steelmaking operations (please specify) :Forgin, Extrusion, Pilgering, Machining

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:
☑ Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

☑ Upstream value chain

☑ Downstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

☑ Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

☑ Tier 3 suppliers

(1.24.7) Description of mapping process and coverage

For the mapping of the value chain we followed four main steps: - Identification of responsible people in the organization, able to develop their buying and selling flows prioritizing key categories and companies. - Identification of the entities, their nature and size, as well as their geographical location. - In the case of the upstream activities, determination of purchasing categories with the greatest impact on total purchases. - In the case of the downstream chain, determination of the business model and sales channels, with all product routes. The analysis has been conducted to determine the different serious impacts and due diligence efforts. [Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

	Plastics mapping	Primary reason for not mapping plastics in your value chain	Explain why your organization has not mapped plastics in your value chain
	Select from: ☑ No, but we plan to within the next two years	*Select from:* ☑ Judged to be unimportant or not relevant	*Our products are steel made and plastics have little use in our value chain*

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

6

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Our short-term vision corresponds to our SBTi commitments. In April 2024 we moved from a sectorial to a cross-sectorial approach setting the following targets: to reduce absolute scope 1 and 2 GHG emissions 64.32% by 2030 from a 2019 base year; and scope 3 GHG emissions 55.40% per EUR value added within the same timeframe. This short-term vision is also aligned with the strategic planning. Although our strategy is planned for 5 years (2023-2027), our ESG strategy is aligned with United Nations Agenda (Sustainable Development Goals 2030) and our key indicators have public target to 2030. This time horizons are set considering climate transition risks and opportunities. For physical risks the time horizons are much longer: Short term: 2020-2039; Medium-term: 2040-2059; and Long-term:2080-2099) For this kind of risks we are considering baseline scenario, high GHG emissions scenario and very high GHG emissions scenario, based on IPCC SSP2-4.5, SSP3-7.0; and SSP 5-8.5.

Medium-term

(2.1.1) From (years)

7

(2.1.3) To (years)

16

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Our medium-term time horizon serves as a crucial step toward achieving our 2050 net-zero commitment. This timeframe enables Tubacex to stay adaptable to evolving trends while maintaining alignment with its net-zero goals.

Long-term

(2.1.1) From (years)

17

(2.1.2) Is your long-term time horizon open ended?

Select from:

☑ No

(2.1.3) To (years)

26

(2.1.4) How this time horizon is linked to strategic and/or financial planning

According to far future climate change impact and recognition of the far below 1.5-scenario in 2050 and our commitment to Net Zero by that year, aligned with European Commission main strategies.
[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: ☑ Yes	*Select from:* ☑ Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities	*Select from:* ☑ Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Partial

(2.2.2.5) Supplier tiers covered

Select all that apply

☑ Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ COSO Enterprise Risk Management Framework

☑ Internal company methods

International methodologies and standards

☑ IPCC Climate Change Projections

Other

☑ Desk-based research

☑ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Drought
☑ Landslide
☑ Wildfires
☑ Heat waves
☑ Cyclones, hurricanes, typhoons
☑ Heavy precipitation (rain, hail, snow/ice)
☑ Flood (coastal, fluvial, pluvial, ground water)

Chronic physical

☑ Changing precipitation patterns and types (rain, hail, snow/ice)
☑ Changing wind patterns
☑ Precipitation or hydrological variability
☑ Temperature variability
☑ Water stress

Policy

☑ Carbon pricing mechanisms
☑ Changes to international law and bilateral agreements
☑ Changes to national legislation

Market

☑ Availability and/or increased cost of raw materials
☑ Changing customer behavior
☑ Uncertainty in the market signals

Reputation

☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback
☑ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)
☑ Stigmatization of sector

Technology

☑ Transition to lower emissions technology and products

☑ Unsuccessful investment in new technologies

Liability

☑ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ NGOs

☑ Customers

☑ Employees

☑ Investors

☑ Suppliers

☑ Regulators

☑ Local communities

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ Yes

(2.2.2.16) Further details of process

Tubacex's approach to analyzing climate-related risks and opportunities is comprehensive, involving several critical phases. We start by identifying 43 significant sites essential to our operations, including our steel plant, production facilities, distribution centers, warehouses, and corporate offices. These locations are thoroughly assessed for their sustainability impact, as they represent the key areas where our activities could have substantial environmental consequences. The scope of risk and opportunity identification, along with their subsequent evaluation, covers facilities selected based on a prior materiality analysis. This analysis assessed factors such as personnel, revenue, production, energy consumption, and water consumption. As a result, 9 plants were identified as material, requiring special attention due to their significant influence on both operations and sustainability. For physical climate risk assessment, we utilize the most recent climate projections provided by the IPCC's Sixth Assessment Report (AR6), which includes Shared Socioeconomic Pathways (SSP). This report provides an extensive view of potential climate scenarios, enabling us to understand how different variables could affect our operations. To evaluate transition risks and opportunities, we rely on scenarios from the International Energy Agency (IEA), while also considering regional and national policies such as the European Green Deal, Fit for 55, REPowerEU, and the EU ETS. This multi-layered approach ensures that our assessment is both globally aligned with scientific consensus and contextually aware of regulatory and policy frameworks that could impact our business. The evaluation of risks and opportunities is conducted through well-established formulas designed to quantify and prioritize potential impacts. Physical risks are assessed by calculating threat, exposure, and vulnerability, with vulnerability being defined as sensitivity divided by adaptive capacity. Transition risks are evaluated based on both the likelihood of occurrence and potential consequences. Opportunities are also assessed, taking into account Tubacex's ability to leverage them and their overall effectiveness, measured through a formula that considers the potential to capitalize on each opportunity

and its practical impact. Our environmental risk assessment is integrated into Tubacex's Corporate General Risk Control Policy, ensuring that environmental risks are managed in conjunction with broader strategic risks. This alignment reinforces our commitment to sustainability and resilience throughout our operations. By adopting this structured approach and incorporating the latest scientific forecasts and policy developments, Tubacex builds a robust framework for identifying, assessing, and managing environmental impacts, dependencies, risks, and opportunities. This method enables us to anticipate future challenges, capitalize on emerging opportunities, and ensure long-term sustainability, aligning with global climate goals and our broader commitment to environmental stewardship.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Water

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

(2.2.2.4) Coverage

Select from:

☑ Partial

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative only

(2.2.2.8) Frequency of assessment

Select from:

☑ Annually

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

☑ Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ LEAP (Locate, Evaluate, Assess and Prepare) approach, TNFD

☑ TNFD – Taskforce on Nature-related Financial Disclosures

☑ WWF Water Risk Filter

☑ Other commercially/publicly available tools, please specify **:**CDSB Framework application guidance for water-related disclosures (Water Guidance)

Enterprise Risk Management

☑ COSO Enterprise Risk Management Framework

Other

☑ External consultants

☑ Materiality assessment

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Drought

☑ Pollution incident

☑ Toxic spills

☑ Other acute physical risk, please specify **:**Lost of species Risk of water shortage

Chronic physical

☑ Increased ecosystem vulnerability

☑ Water availability at a basin/catchment level

Policy

☑ Changes to international law and bilateral agreements

☑ Introduction of regulatory standards for previously unregulated contaminants

☑ Other policy, please specify **:**Disclosure obligations on pollution-related aspects due to new Corporate Sustainability Reporting Directive (CSRD)

Reputation

☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback

Technology

☑ Transition to water efficient and low water intensity technologies and products

Liability

☑ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Customers

☑ Employees

☑ Investors

☑ Local communities

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

☑ Yes

(2.2.2.16) Further details of process

Tubacex has established a thorough process for identifying, assessing, and managing environmental dependencies, impacts, risks, and opportunities. As part of this approach, the company evaluated 43 locations, including steel plants, production sites, distribution centers, warehouses, and corporate offices, to identify material locations with a significant environmental impact. This assessment focused on both the materiality of each site and its sensitivity to water-related risks, in line with the TNFD framework. Tubacex's approach to analyzing water-related risks and opportunities involves a comprehensive evaluation of its material locations with a significant environmental impact. To this end, the organization assessed 43 sites, including steel plants, production facilities, distribution centers, warehouses, and corporate offices where the company operates extensively. This assessment was conducted following the principles of the TNFD, focusing on a contextual analysis of Tubacex's locations. Prioritization of these sites was based on two criteria: their materiality and their sensitivity to water-related issues. The ecological context of each location was analyzed using appropriate bibliographic resources and tools to assess their status with respect to nature through a selection of indicators. For evaluating water risk indicators, the WWF Water Risk Filter was utilized. The analysis identified sensitive areas based on criteria established in the TNFD framework, including high physical water risks, drought risk, flood risk, water quality, and ecosystem service status, drawing on data from WWF's Aqueduct tool. This detailed evaluation allowed Tubacex to identify 11 locations that are particularly vulnerable due to heightened water-related risks. The methodology employed by Tubacex is developed in accordance with IPCC guidelines, TCFD and TNFD recommendations, and COSO's Enterprise Risk Management (ERM) Framework, emphasizing a primarily qualitative approach that relies on expert judgment. This rigorous process enables Tubacex to effectively manage its environmental dependencies and impacts, ensuring sustainable operations and informed decision-making regarding water-related risks and opportunities.
[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

☑ Yes

(2.2.7.2) Description of how interconnections are assessed

Tubacex carries out an exhaustive analysis of environmental risks and opportunities, assessing different environmental components and their interrelationships. This process identifies cross-cutting risks that may affect key areas such as water resources, pollution, biodiversity and climate change. To do this, the dependencies on natural resources such as water, energy and raw materials are analysed by collecting data from the different facilities. The potential impacts of these risks and opportunities are then determined, and how they may affect the various areas is assessed. For example, climate impacts can have an impact on nature and biodiversity, as well as influence water bodies.
[Fixed row]

(2.3) Have you identified priority locations across your value chain?

(2.3.1) Identification of priority locations

Select from:

☑ Yes, we are currently in the process of identifying priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

☑ Direct operations

(2.3.3) Types of priority locations identified

Locations with substantive dependencies, impacts, risks, and/or opportunities

☑ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to water

(2.3.4) Description of process to identify priority locations

Water and climate risk analysis for the key sites

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

☑ No, we have a list/geospatial map of priority locations, but we will not be disclosing it

[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ EBITDA

(2.4.3) Change to indicator

Select from:

☑ % decrease

(2.4.4) % change to indicator

Select from:

☑ 1-10

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

☑ Other, please specify :Climate threat, exposure and vulnerability

(2.4.7) Application of definition

To assess the materiality of Climate and Water transition risks, TUBACEX evaluates both the probability of occurrence, considering historical and future occurrence, and the magnitude of impact across various categories: economic, organizational, reputational, and environmental. The time horizon over which the risk may materialize is also considered. A substantial transition risk is defined by the following criteria: a high probability of occurrence (80%), an economic impact of exceeding 5% of EBITDA; requires the intervention of the Board of Directors due to its organizational impact; severely affects the Group's image and/or its share price; and shows extremely serious and harmful effects on the environment, with irreversible long-term consequences. For evaluating the materiality of Climate and Water physical risks, TUBACEX uses the IPCC's formula as a reference: PHYSICAL RISK THREAT x EXPOSURE x VULNERABILITY, where VULNERABILITY is defined as SENSITIVITY / ADAPTIVE CAPACITY. The outcome of this calculation determines the degree of prioritization, expressed as a percentage. As with transition risks, the time horizon for potential occurrence is taken into account. A substantial physical risk is defined as one with a high or very high prioritization level, ranging from 40% to 100%, with a likelihood of occurrence in the short term.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ EBITDA

(2.4.3) Change to indicator

Select from:

☑ % increase

(2.4.4) % change to indicator

Select from:

☑ 1-10

(2.4.6) Metrics considered in definition

Select all that apply

☑ Time horizon over which the effect occurs

☑ Other, please specify :Impact of the opportunity and Potencial to seize the opportunity

(2.4.7) Application of definition

To assess the materiality of Climate and Water related opportunities, TUBACEX evaluates both its capacity to capitalize on the opportunity and the potential effectiveness of the opportunity. A substantial climate-related opportunity is defined by the following criteria: the ability to integrate or capitalize on the opportunity within the current fiscal year, or an opportunity that is already being leveraged; a significant impact on business operations, efficiency, strategic resilience, financial performance, market positioning, and reputation; and the time horizon over which the opportunity may materialize
[Add row]

(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?

(2.5.1) Identification and classification of potential water pollutants

Select from:

☑ Yes, we identify and classify our potential water pollutants

(2.5.2) How potential water pollutants are identified and classified

At Tubacex, we implement comprehensive policies and processes to identify and classify potential water pollutants, aligned with the ISO 14001 environmental management standard. Our initial assessments focus on detecting substances that may adversely affect water bodies and ecosystems, such as heavy metals and chemical residues. Our environmental management policy mandates thorough analysis of all materials used in production based on their chemical properties and potential environmental risks. We continuously monitor wastewater composition to ensure compliance with legal requirements, effectively managing risks to water bodies and human health. To identify pollutants, we utilize key metrics, including monitoring heavy metal concentrations (e.g., nickel and chromium) and measuring essential parameters like pH, biochemical oxygen demand (BOD), and chemical oxygen demand (COD). These indicators facilitate compliance assessment and guide corrective actions. Our Integrated Environmental Authorizations (AAI) specify pollutants to be measured in discharge streams, detailing the required sampling

frequency for wastewater analysis. This framework enables us to identify potential pollutants and mitigate risks before they impact the environment. We measure success by tracking compliance with legal thresholds, monitoring non-compliance instances, and analyzing results from external accredited bodies conducting periodic assessments.
[Fixed row]

(2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

Row 1

(2.5.1.1) Water pollutant category

Select from:
☑ Nitrates

(2.5.1.2) Description of water pollutant and potential impacts

The main pollutant that is outside the levels of our Environmental Impact Authorization is nitrates.

(2.5.1.3) Value chain stage

Select all that apply
☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply
☑ Beyond compliance with regulatory requirements
☑ Other, please specify **:**Water Treatment Plant

(2.5.1.5) Please explain

From 2026, there will be a Water Treatment Plant that will minimize the impact of pollutants into the river in Spain. Despite this, we are currently well below the limits established/permitted in the integrated environmental impact authorizations.

Row 2

(2.5.1.1) Water pollutant category

Select from:

☑ Inorganic pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Human-caused ammonia in fecal discharges

(2.5.1.3) Value chain stage

Select all that apply

☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☑ Beyond compliance with regulatory requirements

☑ Other, please specify **:**Water Treatment Plant

(2.5.1.5) Please explain

From 2026, there will be a Water Treatment Plant that will minimize the impact of pollutants into the river in Spain. Despite this, we are currently well below the limits established/permitted in the integrated environmental impact authorizations.
[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

☑ Yes, both in direct operations and upstream/downstream value chain

Water

(3.1.1) Environmental risks identified

Select from:

☑ Yes, only within our direct operations

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Evaluation in progress

(3.1.3) Please explain

So far, we have only evaluated the risks related to our direct operations, but we are committed to advancing our evaluations and will be conducting further assessments to identify any potential risks in our upstream and downstream operations. This proactive approach will enable us to uncover vulnerabilities and opportunities for improvement, ensuring we align with our sustainability goals and enhance our overall water management strategy.

Plastics

(3.1.1) Environmental risks identified

Select from:

☑ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☑ Evaluation in progress

(3.1.3) Please explain

Although plastics are almost not used in our processes and product we are conducting a thorough analysis in all our operations
[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Water stress

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Spain

(3.1.1.9) Organization-specific description of risk

Water stress and drought can reduce water availability levels, potentially leading to water usage restrictions in the industry. The steel industry consumes a large amount of water due to the cooling systems used, which could impact production. The main impacts are: Decreased production capacity of plants due to a lack of water for processes and/or water usage restrictions applied to the industry. High investment costs in new water recirculation and saving technologies. Impact on the customer portfolio due to the low availability of products.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Other, please specify **:** Production losses associated with reduced water availability

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Very likely

(3.1.1.14) Magnitude

Select from:

☑ Medium-high

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The risk is expected to have a short-term impact (2020-2039), in terms of production losses due to reduced water availability for processes.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

485000

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

14550000

(3.1.1.25) Explanation of financial effect figure

Currently, Tubacex has not experienced any issues related to water scarcity. However, droughts are expected to increase in the short term, potentially leading to water usage restrictions in the industry. Therefore, the calculation of the projected financial impact is based on a hypothetical scenario of a 10% reduction in water consumption during the summer months (3 months). This would result in production losses, as the company would be forced to reduce its volume, thereby affecting revenues during the water consumption restriction period.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

40000

(3.1.1.28) Explanation of cost calculation

The cost of responding to the risk is given by the sum of investments in water-saving and efficient use technologies implemented during the reporting year.

(3.1.1.29) Description of response

TTo mitigate the risks associated with water use and efficiency, Tubacex has implemented several adaptation measures across its plants. These actions aim to optimize water usage, reduce waste, and ensure long-term sustainability. Key measures include the reuse of water in production processes and the establishment of closed-loop systems, tailored to the specific characteristics of each plant. These systems allow for the efficient recycling of water, minimizing consumption. Tubacex has also automated water circuits to improve the use of cooling water, and installed water meters with remote measurement capabilities to provide precise data on consumption. This ensures a better understanding and control of water use, enabling more informed decision-making. Additionally, purge systems have been optimized, and procedures for reusing wastewater and neutralized water in various stages of production have been implemented. These initiatives contribute to reducing the total amount of water needed, while promoting sustainable resource use. Further energy and water-saving plans have been introduced, including the installation of automatic shut-off systems and solenoid valves in cooling processes. Continuous monitoring ensures that consumption is kept within sustainable limits. These actions are part of Tubacex's broader sustainability strategy and contribute to UN Sustainable Development Goal 6 (Clean Water and Sanitation) by promoting efficient water use and minimizing waste. The company plans to continue refining these measures, ensuring long-term risk management in water security. Example of organization-specific actions: One key initiative involves the automation of water circuits and installation of remote water meters, which have significantly improved the accuracy of consumption data and enhanced water management. This project is ongoing and being implemented across various Tubacex plants.

Water

(3.1.1.1) Risk identifier

Select from:

☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Chronic physical

☑ Water stress

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Spain

(3.1.1.7) River basin where the risk occurs

Select all that apply

☑ Other, please specify **:**Nervion River

(3.1.1.9) Organization-specific description of risk

Water stress and drought can reduce water availability levels, potentially leading to water usage restrictions in the industry. The steel industry consumes a large amount of water due to the cooling systems used, which could impact production. The main impacts are: Decreased production capacity of plants due to a lack of water for processes and/or water usage restrictions applied to the industry. High investment costs in new water recirculation and saving technologies. Impact on the customer portfolio due to the low availability of products.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Other, please specify **:** Production losses associated with reduced water availability

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Very likely

(3.1.1.14) Magnitude

Select from:

☑ Medium-high

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The risk is expected to have a short-term impact (2020-2039), in terms of production losses due to reduced water availability for processes.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

485000

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

14550000

(3.1.1.25) Explanation of financial effect figure

Currently, Tubacex has not experienced any issues related to water scarcity. However, droughts are expected to increase in the short term, potentially leading to water usage restrictions in the industry. Therefore, the calculation of the projected financial impact is based on a hypothetical scenario of a 10% reduction in water consumption during the summer months (3 months). This would result in production losses, as the company would be forced to reduce its volume, thereby affecting revenues during the water consumption restriction period.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

40000

(3.1.1.28) Explanation of cost calculation

The cost of responding to the risk is given by the sum of investments in water-saving and efficient use technologies implemented during the reporting year.

(3.1.1.29) Description of response

To mitigate the risks associated with water use and efficiency, Tubacex has implemented several adaptation measures across its plants. These actions aim to optimize water usage, reduce waste, and ensure long-term sustainability. Key measures include the reuse of water in production processes and the establishment of closed-loop systems, tailored to the specific characteristics of each plant. These systems allow for the efficient recycling of water, minimizing consumption. Tubacex has also automated water circuits to improve the use of cooling water, and installed water meters with remote measurement capabilities to provide precise data on consumption. This ensures a better understanding and control of water use, enabling more informed decision-making. Additionally, purge systems have been optimized, and procedures for reusing wastewater and neutralized water in various stages of production have been implemented. These initiatives contribute to reducing the total amount of water needed, while promoting sustainable resource use. Further energy and water-saving plans have been introduced, including the installation of automatic shut-off systems and solenoid valves in cooling processes. Continuous monitoring ensures that consumption is kept within sustainable limits. These actions are part of Tubacex's broader sustainability strategy and contribute to UN Sustainable Development Goal 6 (Clean Water and Sanitation) by promoting efficient water use and minimizing waste. The company plans to continue refining these measures, ensuring long-term risk management in water security. Example of organization-specific actions: One key initiative involves the automation of water circuits and installation of remote water meters, which have significantly improved the accuracy of consumption data and enhanced water management. This project is ongoing and being implemented across various Tubacex plants.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to international law and bilateral agreements

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Italy

(3.1.1.9) Organization-specific description of risk

Tubacex began transitioning to green energy sources in 2020, with the aim of reaching 100% renewable electricity by 2025. At the Group level, 82.5% of the electricity consumed in 2023 was from green sources, rising to 84% in the first half of 2024. Each facility has a specific percentage of green electricity contracted. In 2023, some plants achieved 100% green electricity, while others, such as the IBF plants in Italy, had a lower share at 19.2%. Across the Group, green electricity represented 33.6% of total energy consumption in 2023, and 32.7% in the first half of 2024. This highlights that a significant portion of the Group's energy consumption still comes from emission-generating sources, such as diesel, propane, and natural gas, which contribute to its Scope 2 GHG emissions. Carbon pricing mechanisms could affect Tubacex's electricity consumption. For energy sourced from fossil fuels, rising CO2 costs under systems like EU ETS II (or similar mechanisms in other regions) would lead to higher electricity prices, driven by the marginal pricing model used in most markets.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Other, please specify **:**Increase in OpEx (expected) due to rising prices of non-green electricity as a result of EU ETS II.

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Very likely

(3.1.1.14) Magnitude

Select from:

☑ Medium-high

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The risk is expected to have a short-term impact in terms of increased operating costs for energy consumption (non-green electricity).

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

66000

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

131000

(3.1.1.25) Explanation of financial effect figure

Currently, there is no financial impact from this new mechanism, as it is in a transitional phase. Regulated entities will need to report their emissions for 2024 starting in 2025, and so on. The obligation to surrender emission allowances begins in 2027. As a result, the current financial effect until 2027 will be 0. It is important to note that if the IBF facilities in Italy achieve the target of 100% green electricity, this risk would be eliminated. Starting in 2027, an indirect impact is expected in the form of increased electricity costs for Tubacex facilities that do not yet have 100% renewable electricity (IBF Vittuone and Piacenza). The implementation of EU ETS II will affect companies supplying fossil fuels (regulated entities). As they will need to pay for their carbon emissions, these companies may incur additional costs that, in many cases, would be passed on to electricity retailers and ultimately to consumers. However, the magnitude of this impact remains uncertain, as it depends on market developments. The expected impact has been estimated based on two scenarios for EUA2 prices (emission allowance under EU ETS II). The estimation is made under the following assumptions: - It is assumed that from 2027 to 2030, both facilities will achieve 50% green electricity (a conservative estimate). - It is assumed that retailers will pass 100% of the cost increase to consumers (Tubacex). - Two scenarios for EUA2 prices are considered: a rapid electrification scenario for transportation, where the EUA2 price remains contained (around 50), and a slower electrification scenario than projected under Fit for 55, where the EUA2 price would be higher (100). This could result in an approximate increase of 10/MWh and 20/MWh, respectively. To obtain a reference annual value for 2027, the average annual consumption of non-green electricity over the last three years (2021-2023) for both facilities was calculated. The approximate annual consumption is 4,369 MWh. This reference consumption was multiplied by the target percentage (50% green electricity) to estimate the non-green electricity consumption for 2027 (2,184 MWh). To determine the additional costs, the aforementioned consumption value was applied with the two price increases according to the ETS II scenarios. The additional costs for non-green electricity consumption are as follows: - Rapid electrification scenario: 66,000 (2027-2030). - Slow electrification scenario: 131,000 (2027-2030)

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

770000

(3.1.1.28) Explanation of cost calculation

The risk response cost is calculated based on the total investments (CapEx) made for implementing energy efficiency improvement initiatives, which consequently reduce electricity consumption. Additionally, it includes the differential OpEx associated with one of the initiatives, representing the extra costs incurred after its implementation.

(3.1.1.29) Description of response

To mitigate the risks related to energy consumption and associated costs, Tubacex has implemented several actions aimed at reducing electricity usage. The measures focus on improving energy efficiency across its facilities. Key initiatives include the installation of LED lamps, which consume significantly less energy compared to traditional lighting. This transition is part of an ongoing effort to reduce the overall electricity demand within the company's operations. Additionally, Tubacex has replaced multifunction printers with models that are more energy-efficient and less polluting. These new devices help to lower electricity consumption and reduce the environmental footprint associated with everyday office operations. Further steps have been taken to enhance energy efficiency in buildings, with targeted improvements in heating, ventilation, and air conditioning (HVAC) systems. By optimizing HVAC performance, the company ensures a more efficient use of energy, reducing both operational costs and carbon emissions. These energy-saving measures are part of Tubacex's broader commitment to sustainability and help mitigate the risks posed by rising energy prices and environmental regulations. The implementation of these actions not only addresses immediate concerns but also aligns with UN Sustainable Development Goal 7 (Affordable and Clean Energy) by promoting energy efficiency and reducing reliance on non-renewable energy sources.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ Spain

(3.1.1.9) Organization-specific description of risk

Carbon pricing mechanisms can have significant implications for Tubacex's operations. For example, the European Union Emission Trading System (EU ETS), which has already impacted one of Tubacex's sites, has undergone some modifications since the end of 2023. Between 2024 and 2027, the total number of allowances issued in the EU will gradually decrease by 4.3% per year, and starting in 2028, this reduction will increase to 4.4% annually. Scope 1 Emissions: With the implementation of Phase IV (2026-2030), a reduction in free allocation is expected due to the lowering of benchmark values. If the currently affected site (Acería de Álava) maintains a similar emission volume, resulting in a deficit balance (where emissions exceed allowances), it could face increased production costs. Additionally, the gradual phasing out of free allocation under the EU ETS for sectors included in the CBAM will occur concurrently with the phased introduction of the CBAM between 2026 and 2034. This reduction will be progressive: free allocation will decrease to 97.5% in 2026, 95% in 2027, 90% in 2028, 77.5% in 2029, 51.5% in 2030, 39% in 2031, 26.5% in 2032, and 14% in 2033. Finally, EU ETS facilities in sectors affected by the CBAM will no longer receive free allocation starting in 2034.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Other, please specify **:**Expected increase in OpEx due to the purchase of emission allowances following the implementation of the CBAM

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Virtually certain

(3.1.1.14) Magnitude

Select from:

☑ Medium-high

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The risk is anticipated to have a short-term impact on operational costs at Acería de Álava, resulting from the EU ETS and the introduction of the CBAM.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

542000

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

2110000

(3.1.1.25) Explanation of financial effect figure

Currently, Acería de Álava (ACVA) is subject to the EU ETS. For the reference year (2023), despite having a deficit balance, it was not necessary to purchase emission allowances because ACVA had a surplus in its portfolio. Therefore, the financial effect figure for the reference year is 0 EUR. In the short term, ACVA is expected to incur increasing costs for the purchase of allowances due to the reduction of free allocations with the entry into force of the CBAM (2026 - 2030). For estimating the anticipated impact in the short term (up to 2030), it is assumed that there will be a deficit balance in ACVA's Scope 1 emissions concerning the minimum preliminary free allocations they would receive during that period. The costs of purchasing emission allowances have been estimated considering: projected emissions at ACVA for the period (2026 - 2030); preliminary free allocations accounting for CBAM reduction factors; and the estimated average price of EUA during the same period. In this regard, it is projected that in 2026, ACVA's Scope 1 emissions will be approximately 28,266 tCO2e; total free allocations for this facility would be around 17,705 tCO2e, resulting in a deficit balance (-10,561 tCO2e). On the other hand, in 2026, it is projected that the EUA price could be approximately 91.35

EUR, according to expert forecasts. Multiplying this price by the emissions deficit, the economic impact in 2026 would be approximately 965 thousand EUR. In 2027, following the same procedure, the impact could be slightly lower (940 thousand EUR), representing the minimum range for the analyzed period. By 2030, ACVA's emissions are expected to decline; however, free allocations will also gradually decrease while the EUA price is projected to increase. Therefore, in 2030, if ACVA's emissions are approximately 25,016 tCO2e and free allocations are 9,352 tCO2e (balance: -15,664 tCO2e), considering an EUA price of about 135 EUR, the economic impact would be around 2.1 million EUR. It is noteworthy that in estimating costs, any potential surplus in portfolio for this year is not being considered. Additionally, both ACVA's annual emissions and EUA prices may fluctuate due to technological or market factors; thus, this estimate should be updated periodically.

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

1220000

(3.1.1.28) Explanation of cost calculation

The cost of risk response is approximately 1.22 million, considering the total investments made to implement various decarbonization initiatives at ACVA (both completed and planned). - CapEx for measures implemented from 2021 to 2023: 127,400 - CapEx for planned measures for the period 2024-2025: 1,095,310

(3.1.1.29) Description of response

To address the risk associated with the tightening of carbon pricing mechanisms, Tubacex has implemented several measures aimed at reducing emissions and improving energy efficiency across its operations. These actions directly target the energy-intensive processes within the company's facilities, with the goal of minimizing exposure to rising carbon costs while enhancing operational sustainability. Key measures already in place include: - Installation of variable frequency drives on combustion motors for the Pits furnaces, which optimizes energy use and reduces electricity consumption, thus lowering the company's carbon footprint. - Installation of a pressure control system for the Hipertemple furnace, improving energy efficiency by enhancing control over combustion processes and minimizing fuel use. In addition to these measures, Tubacex has identified several short-term actions to further mitigate risks associated with carbon pricing: - Installation of heat recovery systems for the PIT furnaces, enabling the reuse of waste heat and reducing overall energy demand. Smoke analyzers to monitor and control emissions in real-time, ensuring compliance with evolving carbon pricing regulations. - Deployment of an oxygen lance to improve combustion efficiency and reduce fuel consumption. - Replacement of the furnace heat recovery system to maximize energy recovery and reduce carbon emissions. These efforts help Tubacex mitigate the financial impact of stricter carbon pricing mechanisms by lowering overall emissions and improving energy efficiency. Moreover, Tubacex's commitment to sustainability and carbon reduction directly supports UN Sustainable Development Goal 13 (Climate Action), which calls for urgent action to combat climate change and its impacts. By investing in energy efficiency and reducing emissions, Tubacex not only adheres to regulatory requirements but also contributes to broader climate action efforts.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Changes to international law and bilateral agreements

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Upstream value chain

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ India
☑ Italy
☑ Spain
☑ Brazil
☑ Canada
☑ Singapore
☑ Kazakhstan
☑ Saudi Arabia
☑ United Arab Emirates
☑ United States of America
☑ France
☑ Guyana
☑ Norway
☑ Austria
☑ Thailand

(3.1.1.9) Organization-specific description of risk

In 2023, a new parallel emissions trading system, EU ETS 2, was introduced, which will be fully implemented starting in 2027. This system will regulate CO2 emissions from fuel consumption in buildings, road transport, and other sectors. It could have an indirect impact on the transportation costs of goods for facilities in Europe, including those in Austria, Italy, and Spain.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Other, please specify **:**Expected increase in OpEx due to cost transfer from EU ETS 2 on diesel for road transport.

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☑ Very likely

(3.1.1.14) Magnitude

Select from:

☑ Medium-high

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The risk is expected to have a short-term impact in terms of increased operating costs, particularly for the diesel used in trucks transporting Tubacex products by road.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☑ Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

127000

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

265000

(3.1.1.25) Explanation of financial effect figure

Currently, there is no financial impact from this new mechanism, as it is still in the transitional phase. Regulated entities will need to report emissions for 2024 starting in 2025, and this process will continue thereafter. The obligation to deliver emission allowances will begin in 2027. As a result, the current financial effect until 2027 will be 0 EUR.

(3.1.1.26) Primary response to risk

Policies and plans

☑ More ambitious environmental commitments and policies

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

No measures have been implemented yet

(3.1.1.29) Description of response

To address the risk of cost transmission through the value chain due to the introduction of the new EU Emissions Trading Scheme (ETS II), Tubacex has not yet established specific measures directly targeting this risk. However, as of April 2024, the Group has received approval for its greenhouse gas (GHG) reduction targets from the Science Based Targets initiative (SBTi). The decarbonization strategies outlined to meet these targets for Scope 1 and 2 emissions include the purchase of green energy for all plants starting in 2025 and implementing various energy efficiency actions across its facilities. Additionally, the company is considering proposed initiatives for decarbonization support from the Basque Government and PERTEs (Strategic Projects for Economic Recovery and Transformation), which are still pending approval. The Group also plans to enhance the scrap contribution in steel production to support increased circularity and reduce material use. For Scope 3 emissions, Tubacex has set an ambitious target of a 55% reduction by 2030 compared to the 2019 baseline. Key strategies to achieve this include reducing material

use, increasing the circularity of materials (i.e., a higher percentage of recycled materials), and reducing emission factors. While specific measures to address the cost transmission risk from EU ETS II are not yet defined, Tubacex's overall decarbonization strategy will help mitigate the impact of increased emissions costs by reducing overall emissions and enhancing energy efficiency. This approach will contribute to managing costs indirectly through improved operational efficiency and sustainability, aligning with UN Sustainable Development Goal 13 (Climate Action) by supporting significant reductions in greenhouse gas emissions.
[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:
☑ Other, please specify :EBITDA

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

735000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:
☑ Less than 1%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

4850000

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☑ 1-10%

(3.1.2.7) Explanation of financial figures

The physical risk of water scarcity is expected to have a short-term impact (2020-2039), affecting production due to reduced water availability in industrial processes. Droughts may lead to water use restrictions, particularly during the summer months, which would decrease production volumes and revenues during these periods. To estimate the financial impact, a hypothetical scenario of a 10% reduction in water flow over three months was considered. Although other scenarios were evaluated, the most conservative one is presented, as the company is implementing adaptation measures, such as investments in water efficiency projects, to mitigate this risk. Regarding transition risks, a short-term impact on operating costs is also expected. The main risks identified are: increased costs from the EU ETS and the introduction of the CBAM, higher costs for raw materials imported from non-EU countries, rising prices for non-renewable energy, and increased fuel costs for transportation. Although some of these risks do not have a direct financial impact currently, starting in 2026, the reduction in free emission allowances will lead to additional costs for purchasing these allowances. As with physical risks, various scenarios have been considered, and the most conservative one has been selected. This approach takes into account that the company is developing decarbonization initiatives and transitioning to renewable energy, which will help to minimize these risks in the future.

Water

(3.1.2.1) Financial metric

Select from:

☑ Other, please specify :EBITDA

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

0

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☑ Less than 1%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

4850000

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☑ 1-10%

(3.1.2.7) Explanation of financial figures

The physical risk of water scarcity is expected to have a short-term impact (2020-2039), affecting production due to reduced water availability in industrial processes. Droughts may lead to water use restrictions, particularly during the summer months, which would decrease production volumes and revenues during these periods. To estimate the financial impact, a hypothetical scenario of a 10% reduction in water flow over three months was considered. Although other scenarios were evaluated, the most conservative one is presented, as the company is implementing adaptation measures, such as investments in water efficiency projects, to mitigate this risk. Regarding transition risks, we have completed an analysis of water-related transition risks, though no financial impact was attributed in the 2023 reporting year. Moving forward, these risks will be incorporated into our 2024 risk analysis, ensuring a more comprehensive understanding and proactive management of potential financial implications.
[Add row]

(3.2) Within each river basin, how many facilities are exposed to substantive effects of water-related risks, and what percentage of your total number of facilities does this represent?

Row 1

(3.2.1) Country/Area & River basin

Spain

☑ Other, please specify **:**Nervión

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

3

(3.2.4) % of your organization’s total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 1-25%

(3.2.10) % organization’s total global revenue that could be affected

Select from:

☑ 21-30%

(3.2.11) Please explain

To identify Tubacex's material locations, the organization carried out an assessment of the physical locations and specific sites with a significant impact on the enviroment. Forty-three sites were included, covering the steel plant, production plants, distribution centers, warehouses and corporate offices, where the company has significant operations. Following the basis of the TNFD, the proposed methodology consists of a contextual analysis of Tubacex locations. Prioritization is based on two criteria: on the one hand, their materiality, and on the other, their sensitivity in relation to water. The analysis of the ecological context of the locations consists of identifying the study locations and using the appropriate bibliographic resources and tools to determine the status of the locations with respect to nature through a selection of indicators. For water risk indicators, the WWF water risk filter was used. The following criteria established in the TNFD framework were used to determine the sensitive areas: Areas of high physical water risks; Drought risk, Flood risk, Water quality and Ecosystem service (water) status, using wwf from aqueduct data as a source.

Row 2

(3.2.1) Country/Area & River basin

Austria

☑ Other, please specify **:**Schwarza River

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization’s total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ Less than 1%

(3.2.10) % organization’s total global revenue that could be affected

Select from:

☑ 11-20%

(3.2.11) Please explain

To identify Tubacex's material locations, the organization carried out an assessment of the physical locations and specific sites with a significant impact on the enviroment. Forty-three sites were included, covering the steel plant, production plants, distribution centers, warehouses and corporate offices, where the company has significant operations. Following the basis of the TNFD, the proposed methodology consists of a contextual analysis of Tubacex locations. Prioritization is based on two criteria: on the one hand, their materiality, and on the other, their sensitivity in relation to water. The analysis of the ecological context of the locations consists of identifying the study locations and using the appropriate bibliographic resources and tools to determine the status of the locations with respect to nature through a selection of indicators. For water risk indicators, the WWF water risk filter was used. The following criteria established in the TNFD framework were used to determine the sensitive areas: Areas of high physical water risks; Drought risk, Flood risk, Water quality and Ecosystem service (water) status, using wwf from aqueduct data as a source.

Row 3

(3.2.1) Country/Area & River basin

Italy

☑ Other, please specify **:**Trebbia river

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

2

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 1-25%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☑ 1-10%

(3.2.11) Please explain

To identify Tubacex's material locations, the organization carried out an assessment of the physical locations and specific sites with a significant impact on the enviroment. Forty-three sites were included, covering the steel plant, production plants, distribution centers, warehouses and corporate offices, where the company has significant operations. Following the basis of the TNFD, the proposed methodology consists of a contextual analysis of Tubacex locations. Prioritization is based on two criteria: on the one hand, their materiality, and on the other, their sensitivity in relation to water. The analysis of the ecological context of the locations consists of identifying the study locations and using the appropriate bibliographic resources and tools to determine the status of the locations with respect to nature through a selection of indicators. For water risk indicators, the WWF water risk filter was used. The following criteria established in the TNFD framework were used to determine the sensitive areas: Areas of high physical water risks; Drought risk, Flood risk, Water quality and Ecosystem service (water) status, using wwf from aqueduct data as a source.

Row 4

(3.2.1) Country/Area & River basin

India

☑ Other, please specify **:**Termora River

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization’s total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ Less than 1%

(3.2.10) % organization’s total global revenue that could be affected

Select from:

☑ 1-10%

(3.2.11) Please explain

To identify Tubacex's material locations, the organization carried out an assessment of the physical locations and specific sites with a significant impact on the enviroment. Forty-three sites were included, covering the steel plant, production plants, distribution centers, warehouses and corporate offices, where the company has significant operations. Following the basis of the TNFD, the proposed methodology consists of a contextual analysis of Tubacex locations. Prioritization is based on two criteria: on the one hand, their materiality, and on the other, their sensitivity in relation to water. The analysis of the ecological context of the locations consists of identifying the study locations and using the appropriate bibliographic resources and tools to determine the status of the locations with respect to nature through a selection of indicators. For water risk indicators, the WWF water risk filter was used. The following criteria established in the TNFD framework were used to determine the sensitive areas: Areas of high physical water risks; Drought risk, Flood risk, Water quality and Ecosystem service (water) status, using wwf from aqueduct data as a source.

Row 5

(3.2.1) Country/Area & River basin

United Arab Emirates

☑ Other, please specify **:**NA

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ Less than 1%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☑ 1-10%

(3.2.11) Please explain

To identify Tubacex's material locations, the organization carried out an assessment of the physical locations and specific sites with a significant impact on the enviroment. Forty-three sites were included, covering the steel plant, production plants, distribution centers, warehouses and corporate offices, where the company has significant operations. Following the basis of the TNFD, the proposed methodology consists of a contextual analysis of Tubacex locations. Prioritization is based on two criteria: on the one hand, their materiality, and on the other, their sensitivity in relation to water. The analysis of the ecological context of the locations consists of identifying the study locations and using the appropriate bibliographic resources and tools to determine the status of the locations with respect to nature through a selection of indicators. For water risk indicators, the WWF water risk filter was used. The following criteria established in the TNFD framework were used to determine the sensitive areas: Areas of high physical water risks; Drought risk, Flood risk, Water quality and Ecosystem service (water) status, using wwf from aqueduct data as a source.

Row 6

(3.2.1) Country/Area & River basin

Saudi Arabia

☑ Other, please specify **:**NA

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

(3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ Less than 1%

(3.2.10) % organization's total global revenue that could be affected

Select from:

☑ 1-10%

(3.2.11) Please explain

To identify Tubacex's material locations, the organization carried out an assessment of the physical locations and specific sites with a significant impact on the enviroment. Forty-three sites were included, covering the steel plant, production plants, distribution centers, warehouses and corporate offices, where the company has significant operations. Following the basis of the TNFD, the proposed methodology consists of a contextual analysis of Tubacex locations. Prioritization is based on two criteria: on the one hand, their materiality, and on the other, their sensitivity in relation to water. The analysis of the ecological context of the locations consists of identifying the study locations and using the appropriate bibliographic resources and tools to determine the status of the locations with respect to nature through a selection of indicators. For water risk indicators, the WWF water risk filter was used. The following criteria established in the TNFD framework were used to determine the sensitive areas: Areas of high physical water risks; Drought risk, Flood risk, Water quality and Ecosystem service (water) status, using wwf from aqueduct data as a source.

Row 7

(3.2.1) Country/Area & River basin

United States of America

☑ Other, please specify **:**NA

(3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☑ Direct operations

(3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

2

(3.2.4) % of your organization’s total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☑ 1-25%

(3.2.10) % organization’s total global revenue that could be affected

Select from:

☑ 1-10%

(3.2.11) Please explain

To identify Tubacex's material locations, the organization carried out an assessment of the physical locations and specific sites with a significant impact on the enviroment. Forty-three sites were included, covering the steel plant, production plants, distribution centers, warehouses and corporate offices, where the company has significant operations. Following the basis of the TNFD, the proposed methodology consists of a contextual analysis of Tubacex locations. Prioritization is based on two criteria: on the one hand, their materiality, and on the other, their sensitivity in relation to water. The analysis of the ecological context of the locations consists of identifying the study locations and using the appropriate bibliographic resources and tools to determine the status of the locations with respect to nature through a selection of indicators. For water risk indicators, the WWF water risk filter was used. The following criteria established in the TNFD framework were used to determine the sensitive areas: Areas of high physical water risks; Drought risk, Flood risk, Water quality and Ecosystem service (water) status, using wwf from aqueduct data as a source.
[Add row]

(3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations
	Select from: ☑ No

[Fixed row]

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

☑ Yes

(3.5.1) Select the carbon pricing regulation(s) which impact your operations.

Select all that apply

☑ EU ETS

(3.5.2) Provide details of each Emissions Trading Scheme (ETS) your organization is regulated by.

EU ETS

(3.5.2.1) % of Scope 1 emissions covered by the ETS

100

(3.5.2.2) % of Scope 2 emissions covered by the ETS

0

(3.5.2.3) Period start date

12/31/2022

(3.5.2.4) Period end date

12/30/2023

(3.5.2.5) Allowances allocated

13050

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

28564

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:

☑ Facilities we own and operate

(3.5.2.10) Comment

TUBACEX has only one facility affected by the EU ETS: Acería de Álava, located in Spain. The GHG emissions covered under this regulation are process emissions and emissions derived from fuel consumption in fixed sources. TUBACEX still has a certain amount of free assignments, but is aware that they will progressively reach 0 in 2035. In addition, we identified a climate risk associated with CBAM that will also affect us, so the company is strategically preparing to face this situation through technological improvements and emission reduction initiatives.
[Fixed row]

(3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

TUBACEX is committed to complying with climate change regulations and maintaining a focus on carbon pricing systems. The company ensures annual compliance with the EU Emissions Trading System (EU ETS) for affected sites and conducts regular reviews to confirm that other installations within the European Union remain outside its scope. This involves assessing the installed and production capacities of its facilities using a customized tool. TUBACEX also closely monitors emerging global and regional climate-related regulations, including carbon pricing mechanisms. A notable example is the Carbon Border Adjustment Mechanism (CBAM), established under Regulation 2023/956 on May 10, 2023. CBAM will require importers of EU goods to purchase certificates equivalent to the carbon price that would have applied had the goods been produced under EU carbon pricing rules. In response, the company has developed an adaptation project to ensure compliance during the CBAM transition period, which includes quarterly reporting on the emissions associated with its imports.   As part our global business strategy and commitments to combating climate change, we are continuously working to reduce our energy consumption and carbon footprint. Given the ongoing evolution and enhancement of carbon taxes and trading schemes worldwide, we recognize the likelihood of carbon taxes being implemented in the near future. We are acutely aware of the potential impact on our business and have implemented various initiatives to mitigate this risk, including energy efficiency measures, green economy practices, and circularity initiatives such as waste reduction and reuse initiatives.   In addition to the aforementioned measures, with the upcoming implementation of the Corporate Sustainability Reporting Directive (CSRD) in 2025, TUBACEX has conducted an analysis for the 2023 financial year to identify any gaps between its current management practices and the new reporting requirements. This gap analysis, combined with a materiality assessment, has facilitated the development of a roadmap to align with the new reporting standards effectively.   Finally, in 2021, TUBACEX carried out an analysis of the NACE codes under which each of the companies operate, classifying each of these activities as eligible or ineligible, depending on its inclusion in Annex I of Regulation (EU) 2020/852 (European Taxonomy). Therefore, companies dedicated to steel manufacturing and, by extension, all those dedicated to tube manufacturing were included in the eligibility analysis. However, considering the implications of the description of the activity (3.9 iron and steel manufacturing) for determining eligibility, TUBACEX recalculated these figures in 2022, considering steel manufacturing activities (ACERÁLAVA) as eligible, excluding the process of manufacturing tubes and other tubular products included in the 2021 analysis, hence responding to a more precise interpretation of the Directive. In 2023, TUBACEX analyzed the implications of extending eligibility to the remaining environmental targets for subsequent inclusion in this report.

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

	Environmental opportunities identified
Climate change	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized

	Environmental opportunities identified
Water	*Select from:* ☑ Yes, we have identified opportunities, and some/all are being realized

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Cost savings

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Upstream value chain

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ India
☑ Italy
☑ Spain
☑ Brazil
☑ Canada
☑ Singapore
☑ Kazakhstan
☑ Saudi Arabia
☑ United Arab Emirates
☑ United States of America
☑ France
☑ Guyana
☑ Norway
☑ Austria
☑ Thailand

(3.6.1.8) Organization specific description

Byproducts generated by the stainless steel industry, such as slags, contain valuable elements in the form of oxides or metals. Some of these elements can pose environmental challenges if improperly disposed of. Stainless steel slags are currently the main type of non-hazardous waste produced by the Group. Therefore, any approach towards circular economy solutions for the treatment, recovery, and valorization of this type of waste would have a significant economic and environmental impact.

(3.6.1.9) Primary financial effect of the opportunity

Select from:
☑ Other, please specify **:**Reduction/Savings in OPEX (actual or expected) in Waste Management

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply
☑ Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:
☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-high

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

It is expected that this opportunity will have a short-term impact in terms of reducing waste management operational costs.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ Yes

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

630000

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

770000

(3.6.1.23) Explanation of financial effect figures

To assess the financial impact of optimizing waste management at TUBACEX, the current costs associated with managing its main non-hazardous waste—stainless steel slag—have been analyzed. This waste undergoes R4 treatment for the recovery of metals and metallic compounds. Currently, the valorization process takes place at a specialized plant in Europe dedicated to stainless steel industry products, which incurs an operational cost of 1,400,000 for TUBACEX. To enhance efficiency and reduce management and transportation costs, TUBACEX conducted a market study to identify valorization plants in Spain that could facilitate local waste management. As a result, a local supplier in the Basque Country was identified, which could halve the operational costs associated with the treatment of this waste. Following this analysis, TUBACEX has made the strategic decision to switch to this local supplier, enabling significant savings in operational costs. However, as the supplier change has not yet been implemented, no financial impacts have been recorded in the reporting year. In the short term, a reduction in expenses to 700,000 is anticipated, with an estimated variation of /- 10%.

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

No cost has been identified associated with implementing the opportunity.

(3.6.1.26) Strategy to realize opportunity

TUBACEX has implemented various measures for more sustainable waste management, ranging from the efficient management of hazardous waste to specific initiatives at different plants. The most ambitious project in this area is related to the management and recovery of slag, the main non-hazardous waste from its steelworks. Initiated in 2022 and continued in 2023, this project has managed to avoid sending 14,487 tonnes of slag to landfill in 2023 and 10,714 tonnes in 2022. The slag revalorisation process is currently carried out at a recovery plant in Europe, specialising in products from the stainless steel industry. With the aim of improving efficiency and reducing management and transport costs, TUBACEX carried out a market study to identify recovery plants in Spain that would allow for local waste management. As a result, a local supplier was identified in the Basque Country that would enable the operating costs associated with the treatment of this waste to be reduced by half. Based on these results, TUBACEX has made a strategic decision to switch to this local supplier, which will enable it to make significant savings in its operating costs.

Water

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp4

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☑ Other energy source opportunity, please specify **:**Efficiency in the use of water resources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ Spain

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☑ Other, please specify **:**Nervion River

(3.6.1.8) Organization specific description

Water is an essential natural resource in the TUBACEX manufacturing process. With the increasing incidence of more frequent and severe droughts due to climate change, it is essential to improve water management and optimize water consumption, especially in regions more susceptible to water scarcity. In this regard, TUBACEX can implement various strategies. These include the installation of systems to treat and reuse the water used in the cooling, inspection and cleaning processes, the adoption of advanced technologies such as closed-loop cooling systems and dry cleaning methods that reduce water consumption, and the implementation of real-time monitoring systems to control water use and detect leaks or waste. The potential to take advantage of the opportunity is considered "High", as it is an opportunity that can be integrated in the short-medium term and for which certain measures have already been taken. The impact of the opportunity is considered "High", due to the importance of water in the company's operations, which could significantly influence the company's operations, efficiency and bottom line.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced direct costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-high

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The opportunity is expected to have a short-term impact in terms of reducing operational costs related to water consumption.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ No

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

No cost has been identified associated with implementing the opportunity.

(3.6.1.26) Strategy to realize opportunity

In 2022, TUBACEX launched a project to evaluate the maturity of its water management practices. Initially, the focus was on analyzing the operational aspects of the plants, followed by an assessment of geographic factors and potential associated risks. This project identified opportunities to improve water management and optimize consumption across its facilities. As a result, TUBACEX has developed a water use and protection management plan that incorporates solutions like water recovery processes. These efforts aim to enhance the efficiency of water use, ensuring more sustainable practices and addressing potential risks related to water availability and usage in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☑ Increased efficiency of production and/or distribution processes

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ India
☑ Italy
☑ Spain
☑ Brazil
☑ Canada
☑ Singapore
☑ Kazakhstan
☑ Saudi Arabia
☑ United Arab Emirates
☑ United States of America
☑ France
☑ Guyana
☑ Norway
☑ Austria
☑ Thailand

(3.6.1.8) Organization specific description

Improving energy efficiency in processes has a direct impact on reducing emissions and lowering TUBACEX's operational costs (OPEX). Therefore, implementing energy-efficient technologies represents a valuable opportunity for the company. This includes the use of more efficient furnaces, optimizing manufacturing processes through the implementation of energy management systems and advanced automation, as well as recovering waste heat for reuse in the production process.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-high

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The opportunity is expected to have a short-term impact in terms of reducing operational costs related to energy consumption.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ Yes

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

4080

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

4980000

(3.6.1.23) Explanation of financial effect figures

To assess the financial impact of this opportunity, the reduction in operational expenses (OPEX) resulting from energy consumption has been considered, thanks to various energy efficiency initiatives and projects implemented or planned at TUBACEX's facilities. These initiatives include the installation of digital systems for energy measurement and control, the adoption of specific technologies, and the application of measures within production processes. The reported figure for the reference year includes the savings generated by all initiatives and projects already implemented across TUBACEX's different plants. Conversely, the anticipated financial impact takes into account the estimated reduction in OPEX for the projects and initiatives planned for short-term execution, with an estimated variation of /- 10%.

(3.6.1.24) Cost to realize opportunity

576000

(3.6.1.25) Explanation of cost calculation

The capital expenditure (CapEx) associated with the energy efficiency projects and measures already implemented has been considered as the cost of pursuing this opportunity.

(3.6.1.26) Strategy to realize opportunity

One of the main initiatives adopted by TUBACEX to reduce its environmental impact is improving the energy efficiency of its facilities. To achieve this, various projects have been initiated and planned, including the deployment of digital energy measurement and control systems, the adoption of specific technologies, and the implementation of measures in production processes such as waste heat recovery, fuel switching, low-energy carbon consumption, process optimization, and the replacement of machinery with more efficient equipment, among others. In 2022, a notable project was carried out at the ACERALAVA plant, recognized for its technological innovation in energy efficiency and sustainability. This project has driven the comprehensive digitalization of the manufacturing process in the steelworks, transforming it into a smart plant, resulting in significant waste reduction and optimized furnace operations.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☑ Use of low-carbon energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ India
☑ Italy
☑ Spain
☑ Brazil
☑ Canada
☑ Singapore
☑ Kazakhstan
☑ Saudi Arabia
☑ United Arab Emirates
☑ United States of America
☑ France
☑ Guyana
☑ Norway
☑ Austria
☑ Thailand

(3.6.1.8) Organization specific description

TUBACEX's production processes are energy-intensive and currently rely heavily on natural gas. To reduce CO2 emissions, TUBACEX could integrate renewable energy sources into its production process, such as using green hydrogen produced with onsite electrolyzers powered by renewable electricity, either generated internally or acquired through power purchase agreements (PPAs). This strategy will not only help the company reduce its carbon footprint but also ensure a supply of clean electricity, contribute to lower long-term energy costs, and decrease its dependence on fossil fuels.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Reduced indirect (operating) costs

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☑ Short-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-high

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The opportunity is expected to have a short-term impact in terms of reducing energy consumption operational costs, thanks to the implementation and use of energy from renewable sources.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☑ Yes

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

11100000

(3.6.1.18) Anticipated financial effect figure in the short-term – maximum (currency)

13570000

(3.6.1.23) Explanation of financial effect figures

To assess the financial impact of this opportunity, the reduction in operational expenses (OPEX) due to lower gas consumption has been considered, thanks to the use of cleaner energy sources. Data from a study conducted by TUBACEX has been utilized, which projects a 60% decrease in gas consumption by 2030, using the 2019 consumption level (326,423 MWh/year) as a reference. Considering this projected 60% reduction in gas consumption from the 2019 level, the expected decrease in consumption amounts to 198,853.80 MWh/year. This figure has been multiplied by the average gas price in Spain between 2019 and 2023, as this is where TUBACEX concentrates the majority of its consumption. To calculate the maximum and minimum values, an estimated variation of /- 10% has been applied.

(3.6.1.24) Cost to realize opportunity

3192000

(3.6.1.25) Explanation of cost calculation

As the cost of implementing the opportunity, capital expenditure (Capex) on research and development (R&D) for alternative energy sources has been considered.

(3.6.1.26) Strategy to realize opportunity

One of TUBACEX's main decarbonisation strategies to achieve its SBTi emissions reduction targets is the purchase of green energy at all its plants from 2025 onwards. In this context, the company has implemented and planned projects that increase the use of low-carbon energy sources, especially through power purchase agreements (PPAs) at its different facilities. In addition, TUBACEX allocates CAPEX to research and development of alternative energy sources, such as the use of green hydrogen produced on site. It also has projects for the future installation of photovoltaic panels at some of its plants.
[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:
☑ Other, please specify **:**EBITDA

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

15810000

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☑ 11-20%

(3.6.2.4) Explanation of financial figures

Several short-term opportunities have been identified that are expected to reduce operating costs related to energy consumption, waste management, and the transition to renewable energy sources. One key opportunity involves optimizing the management of stainless steel slag, a non-hazardous waste that incurs significant expenses when processed at a specialized facility. By switching to a local provider, TUBACEX aims to significantly cut these costs, leading to substantial savings. Additionally, TUBACEX has implemented various energy efficiency initiatives, including the installation of digital monitoring systems and the adoption of advanced technologies. These efforts are anticipated to further reduce operational expenses related to energy consumption. Another significant opportunity lies in the projected reduction of natural gas consumption through the use of cleaner energy sources. This shift is expected to yield additional savings on operational expenses, contributing to the overall reduction in costs. Various scenarios have been considered, and the most conservative one has been selected to ensure a cautious approach in evaluating the financial impact of these opportunities. This method takes into account potential market fluctuations and the gradual implementation of initiatives, allowing TUBACEX to minimize financial risk while leveraging identified opportunities for cost savings.

Water

(3.6.2.1) Financial metric

Select from:

☑ Other, please specify **:**EBITDA

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

0

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☑ Less than 1%

(3.6.2.4) Explanation of financial figures

Although opportunities related to the environmental issue of water have been identified, a financial analysis aligned with the substantive effects of these opportunities was not conducted in the 2023 reporting year. However, this evaluation is planned for 2024 to ensure a more comprehensive understanding of the financial impact and potential benefits.
[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☑ Executive directors or equivalent

☑ Non-executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

The policy covers the regular analysis of the composition of the Board of Directors, with the aim of appointing individuals who meet the established criteria. This approach seeks to enhance the diversity of the Board in terms of knowledge, experience, backgrounds, nationalities, and gender, fostering a more comprehensive and inclusive governance structure.
[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Chief Executive Officer (CEO)

☑ Board-level committee

☑ President

☑ Other, please specify **:**President of the Sustainability and Good Governance commission

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :REGULATION OF THE SUSTAINABILITY AND GOOD GOVERNANCE COMMISSION OF THE BOARD OF DIRECTORS OF TUBACEX, S.A.

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Overseeing and guiding scenario analysis
☑ Overseeing the setting of corporate targets
☑ Monitoring progress towards corporate targets
☑ Overseeing and guiding public policy engagement
☑ Overseeing and guiding public policy engagement
☑ Overseeing and guiding acquisitions, mergers, and divestitures
☑ Overseeing and guiding the development of a climate transition plan
☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
☑ Reviewing and guiding innovation/R&D priorities
☑ Approving and/or overseeing employee incentives
☑ Overseeing and guiding major capital expenditures
☑ Monitoring the implementation of a climate transition plan
☑ Overseeing and guiding the development of a business strategy

(4.1.2.7) Please explain

The board of directors is informed in a monthly meeting. CEO informs of all topics regarding strategy and management including sustainability. The monthly report presented to the board includes the following variables: • Supply chain operations, including raw material origin and climate impact • Production operations consumption of key resources (energy, water, materials) and scope 123 emissions • Internal and external logistics and scope 3 emissions • Circular economy indicators related to renewable material consumptions and This information is showed as an evolution of the past 12 months and compared to the objective defined for the year The sustainability and good governance commission meets 4 times a year and reviews the ESG strategy deployment

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Chief Executive Officer (CEO)

☑ President

☑ Other, please specify :President of the Sustainability and Good Governance commission

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify :REGULATION OF THE SUSTAINABILITY AND GOOD GOVERNANCE COMMISSION OF THE BOARD OF DIRECTORS OF TUBACEX, S.A.

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

☑ Overseeing and guiding public policy engagement

☑ Overseeing and guiding public policy engagement

☑ Reviewing and guiding innovation/R&D priorities

☑ Approving and/or overseeing employee incentives

☑ Overseeing and guiding major capital expenditures

☑ Overseeing and guiding the development of a business strategy

☑ Overseeing and guiding acquisitions, mergers, and divestitures

☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.7) Please explain

The Board of Directors is regularly informed of the progress of the projects included in the sustainability plan. Both through the Corporate Governance and Sustainability Committee and through the CEO, they have access to all the necessary information regarding: - Evolution of environmental indicators. - Evolution of relevant projects within the sustainability plan: materiality, decarbonization, sustainable financing. - Evolution of environmental risks and opportunities projects (climate, pollution, circular economy, water resources and biodiversity). The sustainability and good governance commission meets 4 times a year and reviews the ESG strategy deployment

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Chief Executive Officer (CEO)

☑ President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☑ Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

☑ Other policy applicable to the board, please specify **:**REGULATION OF THE SUSTAINABILITY AND GOOD GOVERNANCE COMMISSION OF THE BOARD OF DIRECTORS OF TUBACEX, S.A.

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☑ Reviewing and guiding annual budgets
- ☑ Overseeing the setting of corporate targets
- ☑ Monitoring progress towards corporate targets
- ☑ Approving corporate policies and/or commitments
- ☑ Overseeing and guiding public policy engagement
- ☑ Overseeing reporting, audit, and verification processes
- ☑ Overseeing and guiding acquisitions, mergers, and divestitures
- ☑ Monitoring supplier compliance with organizational requirements
- ☑ Monitoring compliance with corporate policies and/or commitments
- ☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☑ Overseeing and guiding public policy engagement
- ☑ Reviewing and guiding innovation/R&D priorities
- ☑ Approving and/or overseeing employee incentives
- ☑ Overseeing and guiding major capital expenditures
- ☑ Monitoring the implementation of the business strategy

(4.1.2.7) Please explain

The Board of Directors is regularly informed of the progress of the projects included in the sustainability plan. Both through the Corporate Governance and Sustainability Committee and through the CEO, they have access to all the necessary information regarding: - Evolution of environmental and biodiversity indicators. - Evolution of relevant projects within the sustainability plan: materiality, decarbonization, sustainable financing. - Evolution of environmental risks and opportunities projects (climate, pollution, circular economy, water resources and biodiversity). The sustainability and good governance commission meets 4 times a year and reviews the ESG strategy deployment
[Fixed row]

(4.2) Does your organization’s board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

- ☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Engaging regularly with external stakeholders and experts on environmental issues

☑ Integrating knowledge of environmental issues into board nominating process

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

☑ Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Additional training

☑ Training in an environmental subject by a certified organization, please specify **:**Experience

Experience

☑ Executive-level experience in a role focused on environmental issues

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

☑ Consulting regularly with an internal, permanent, subject-expert working group

☑ Engaging regularly with external stakeholders and experts on environmental issues

☑ Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	*Select from:* ☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

☑ Measuring progress towards environmental science-based targets

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a climate transition plan

☑ Managing major capital and/or operational expenditures relating to environmental issues

☑ Conducting environmental scenario analysis

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

Other

☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

In addition to this, TUBACEX is empowering the Sustainability and Good Governance Commission approved in 2021. Their main objective is to ensure their execution and to monitor the evolution of GHG emissions, SBT performance, Climate Risks, Decarbonization initiatives, etc.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental targets

Strategy and financial planning

☑ Developing a business strategy which considers environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Managing acquisitions, mergers, and divestitures related to environmental issues

☑ Managing major capital and/or operational expenditures relating to environmental issues

Other

☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

In addition to this, TUBACEX is empowering the Sustainability and Good Governance Commission approved in 2021. Their main objective is to ensure the integration of Water impacts, dependencies, risks and opportunities in the global model.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Sustainability Officer (CSO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing public policy engagement related to environmental issues

☑ Managing value chain engagement related to environmental issues

Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

☑ Setting corporate environmental policies and/or commitments

Strategy and financial planning

☑ Developing a climate transition plan

☑ Implementing a climate transition plan

☑ Conducting environmental scenario analysis

issues

☑ Managing annual budgets related to environmental issues

☑ Implementing the business strategy related to environmental issues

☑ Developing a business strategy which considers environmental issues

☑ Managing environmental reporting, audit, and verification processes

☑ Managing acquisitions, mergers, and divestitures related to environmental

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

CSO has the responsability to define strategies, policies, action plans and objectives related to bio diversity
[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

2

(4.5.3) Please explain

We apply a PDCA management model, defining key performance indicators at the start of the year for each area, including sustainability metrics (e.g., energy intensity, emissions, % of renewable electricity, and waste management). These indicators are tied to the performance evaluations of managers, from operational levels to the C-suite, using a top-down approach for setting objectives and a bottom-up method for measuring performance. Over 300 key employees are included in this system. The ESG objective weighs 5% of the total variable compensation, which is made up of economic, area, and personal objectives (totaling 100%). In 2023, this objective was based on 21 Environmental, Social, and Governance indicators, with environmental aspects comprising 34% of the ESG panel. The total impact on compensation was 1.7%. For 2024, the system was simplified to three key indicators representing this 5%, with Scope 1 and 2 emissions being one of them, contributing equally to the ESG panel.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☑ Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

0.3

(4.5.3) Please explain

We apply a PDCA management model, defining key performance indicators at the start of the year for each area, including sustainability metrics (e.g., energy intensity, emissions, % of renewable electricity, and waste management). These indicators are tied to the performance evaluations of managers, from operational levels to the C-suite, using a top-down approach for setting objectives and a bottom-up method for measuring performance. Over 300 key employees are included in this system. The ESG objective weighs 5% of the total variable compensation, which is made up of economic, area, and personal objectives (totaling 100%). In 2023,

this objective was based on 21 Environmental, Social, and Governance indicators, with environmental aspects comprising 34% of the ESG panel. The total impact of water intensity was 0.3%.
[Fixed row]

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Executive Officer (CEO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Achievement of environmental targets

Strategy and financial planning

☑ Board approval of climate transition plan

☑ Shareholder approval of climate transition plan

☑ Achievement of climate transition plan

☑ Shift to a business model compatible with a net-zero carbon future

Emission reduction

☑ Implementation of an emissions reduction initiative

☑ Reduction in emissions intensity

☑ Increased share of renewable energy in total energy consumption

☑ Reduction in absolute emissions

Resource use and efficiency

☑ Energy efficiency improvement

☑ Reduction in total energy consumption

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

The committee is evaluated on sustainability criteria in the monthly PDCA. Each of the selected committee members has an evaluation KPI in their PDCA which depends directly on sustainability performance. This factor is measured as different KPI and compared to the annual fixed objective. Meeting these objectives has a direct impact on their annual bonus.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Incentives can play a crucial role in driving the adoption of sustainable practices and technologies. It should be noted that, with the new variable remuneration policy, climate targets (the reduction of the TUBACEX emissions intensity and carbon footprint among its objectives) are included along with other financial objectives

Water

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

☑ Chief Compliance Officer (CCO)

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Achievement of environmental targets

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

(4.5.1.5) Further details of incentives

The committee is evaluated on sustainability criteria in the monthly PDCA. Each of the selected committee members has an evaluation KPI in their PDCA which depends directly on sustainability performance. This factor is measured as different KPI and compared to the annual fixed objective. Meeting these objectives has a direct impact on their annual bonus.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

Incentives can play a crucial role in driving the adoption of sustainable practices and technologies. It should be noted that, with the new variable remuneration policy in 2023 (environmental targets such as water consumption) are included along with other financial objectives.
[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: ☑ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Climate change

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

(4.6.1.4) Explain the coverage

This Policy applies to all subsidiaries, facilities and commercial offices that make up the Group, although there is a mention to extending these requirements to the value chain. In addition to this, there is an specific Purchasing policy, as well as Purchasing General Terms and Conditions, that incorporates the extension of envirionmental commitment to suppliers

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to a circular economy strategy
☑ Commitment to comply with regulations and mandatory standards
☑ Commitment to take environmental action beyond regulatory compliance
☑ Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

☑ Commitment to 100% renewable energy
☑ Commitment to net-zero emissions

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

Integrated-environmental-policy_Tubacex.pdf

Row 2

(4.6.1.1) Environmental issues covered

Select all that apply

☑ Water

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

(4.6.1.4) Explain the coverage

This Policy applies to all subsidiaries, facilities and commercial offices that make up the Group, although there is a mention to extending these requirements to the value chain. In addition to this, there is an specific Purchasing policy, as well as Purchasing General Terms and Conditions, that incorporates the extension of envirionmental commitment to suppliers

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to comply with regulations and mandatory standards

☑ Commitment to take environmental action beyond regulatory compliance

Water-specific commitments

☑ Commitment to control/reduce/eliminate water pollution

☑ Commitment to reduce water consumption volumes

☑ Commitment to reduce water withdrawal volumes

☑ Commitment to the conservation of freshwater ecosystems

☑ Other water-related commitment, please specify **:**Implementation of water efficiency initiatives Preserve and make responsible use of available natural resources and in particular, water consumption

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☑ Yes, in line with Sustainable Development Goal 6 on Clean Water and Sanitation

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

Integrated-environmental-policy_Tubacex.pdf
[Add row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☑ UN Global Compact

☑ Other, please specify **:**European Steel Tube Association (ESTA) • The Cluster Association of the Steel Industry (SIDEREX) • The Spanish Association of Fluid Handling Equipment Exporters (FLUIDEX) • International Umbilical Manufacturer´s Federation (UMF) • Innobasque • Basque

(4.10.3) Describe your organization’s role within each framework or initiative

Since 2004, TUBACEX has been a signatory of the United Nations Global Compact, the world’s largest voluntary initiative on human rights, labor, environment and anti-corruption. By signing the Compact, TUBACEX joins in the support for the basic pillars to overcome major challenges to sustainable development, promoting the 10 universal principles and reporting annually on progress made in these areas. It also materializes its commitment to the promotion of the major challenges of sustainable development, channeled through the 2030 Agenda and its Sustainable Development Goals (SDGs), from which the rest of the proposals, policies and strategies of international frameworks for sustainability derive
[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

☑ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

☑ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

☑ Paris Agreement

(4.11.4) Attach commitment or position statement

Grupo-Tubacex-S.A.-Near-Term-Approval-Letter-Monday-8th-April-2024.pdf

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

☑ No

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Tubacex participates in several associations that could influence environmental regulations at national and international levels. • European Steel Tube Association (ESTA) • The Cluster Association of the Steel Industry (SIDEREX) • The Spanish Association of Fluid Handling Equipment Exporters (FLUIDEX) • International Umbilical Manufacturers Federation (UMF) • Innobasque • Basque Energy Cluster • API (American Petroleum Institute) • The Steel Manufacturers Association (UNESID) • International Energy Forum IEF • International Gas Union IGU • Stainless Steel Tube Trade Advancement Committee SSTTAC • Spanish-Norwegian Chamber of Commerce Through different periodic meetings, where the aspects with the greatest impact on the sector are discussed, the next steps are agreed upon to convey the industry's opinion and concerns to international organizations responsible for decision making.
[Fixed row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

Row 1

(4.11.2.1) Type of indirect engagement

Select from:
☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe
☑ Other trade association in Europe, please specify **:**UNESID

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply
☑ Climate change

(4.11.2.6) Indicate whether your organization’s position is consistent with the organization or individual you engage with

Select from:
☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

UNESID incorporated Spanish steel manufacturers position. UNESID collaborates in the structuring of Spanish and European companies (as it belongs to Worldsteel and EUROFER) and actively participate in the legislative and standardization process, providing the vision of the sector from the first phases of the legislative process and at different moments of its evolution on the main challenges, concerns and needs of the sector at a European, national and even regional level. UNESID also acts as interlocutor with the administration to facilitate and standardize the interpretation of environmental requirements

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 2

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe

☑ Other trade association in Europe, please specify **:**European Steel Tube Association ESTA

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Climate change

(4.11.2.6) Indicate whether your organization’s position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual’s position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization’s position is consistent with or differs from the organization or individual’s position, and any actions taken to influence their position

ESTA represents the interests of the Steel Pipe Association and consequently of nearly all producers of steel pipes in the EU. Among its goals we can find: to represent the Industry on all matters linked with the Customs Regulations, and to act on its behalf in any event of unfair trade; or to keep the European Commission advised of the needs of the Industry.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization’s engagement is aligned with global environmental treaties or policy goals

Select from:
☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization’s engagement on policy, law or regulation

Select all that apply
☑ Paris Agreement

Row 3

(4.11.2.1) Type of indirect engagement

Select from:
☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Europe
☑ Other trade association in Europe, please specify **:**IGU

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply
☑ Climate change

(4.11.2.6) Indicate whether your organization’s position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The mission of IGU is to advocate gas as an integral part of a sustainable global energy system, and to promote the political, technical and economic progress of the gas industry. It has the vision of being the most influential, effective and independent non-profit organisation, serving as the spokesperson for the gas industry worldwide

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Paris Agreement

Row 4

(4.11.2.1) Type of indirect engagement

Select from:

☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

Global

☑ Other global trade association, please specify :s Association UNESID (Spanish Association of Companies Producing Steel and Primary Steel Processing Products)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☑ Water

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☑ Consistent

(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☑ No, we did not attempt to influence their position

(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

UNESID incorporated Spanish steel manufacturers position. UNESID collaborates in the structuring of Spanish and European companies (as it belongs to Worldsteel and EUROFER) and actively participate in the legislative and standardization process, providing the vision of the sector from the first phases of the legislative process

and at different moments of its evolution on the main challenges, concerns and needs of the sector at a European, national and even regional level. UNESID also acts as interlocutor with the administration to facilitate and standardize the interpretation of environmental requirements.

(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

0

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☑ Yes, we have evaluated, and it is aligned

(4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☑ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

☑ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

☑ GRI

☑ TCFD

☑ TNFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Emission targets

☑ Emissions figures

☑ Risks & Opportunities

☑ Value chain engagement

☑ Dependencies & Impacts

☑ Content of environmental policies

☑ Other, please specify **:People & Talent**

(4.12.1.6) Page/section reference

5.3.1. Environment

(4.12.1.7) Attach the relevant publication

2023-Sustainability-Report.pdf

(4.12.1.8) Comment

This Sustainability Report is part of TUBACEX's management report and addresses Environmental, Social, and Governance (ESG) issues, including human rights and anti-bribery efforts, as identified through the company's materiality assessment and sustainability strategy. It highlights key priorities and corporate commitments while complying with Act 11/2018 on the disclosure of non-financial information, which is also subject to external audit. The report includes significant impacts from the reporting period and prioritizes material information based on established references, including the Global Reporting Initiative (GRI) standards, EFRAG guidelines, and supervisory publications from ESMA and CNMV. Covering the period from January 1 to December 31, 2023, it also provides comparative data from 2022. The report encompasses the entire Group, except where specific indicators are detailed with particular scopes.

Row 2

(4.12.1.1) Publication

Select from:

☑ In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

☑ GRI

☑ TCFD

☑ TNFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Water

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Risks & Opportunities

☑ Dependencies & Impacts

☑ Content of environmental policies

☑ Other, please specify **:Consumption**

(4.12.1.6) Page/section reference

5.3.1. Environment

(4.12.1.7) Attach the relevant publication

2023-Sustainability-Report.pdf

(4.12.1.8) Comment

This Sustainability Report is part of TUBACEX's management report and addresses Environmental, Social, and Governance (ESG) issues, including human rights and anti-bribery efforts, as identified through the company's materiality assessment and sustainability strategy. It highlights key priorities and corporate commitments while complying with Act 11/2018 on the disclosure of non-financial information, which is also subject to external audit. The report includes significant impacts from the reporting period and prioritizes material information based on established references, including the Global Reporting Initiative (GRI) standards, EFRAG guidelines, and supervisory publications from ESMA and CNMV. Covering the period from January 1 to December 31, 2023, it also provides comparative data from 2022. The report encompasses the entire Group, except where specific indicators are detailed with particular scopes.
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

☑ Yes

(5.1.2) Frequency of analysis

Select from:

☑ Annually

Water

(5.1.1) Use of scenario analysis

Select from:

☑ No, and we do not plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☑ Lack of available methodologies

(5.1.4) Explain why your organization has not used scenario analysis

In our water-related analysis, scenario-based approaches were not considered. Instead, the evaluation was based on the current level of threat, using historical data for both impact drivers and the dependencies analyzed. This approach focused on addressing immediate risks. However, we acknowledge the importance of scenario analysis and plan to incorporate it in the future to improve our ability to address water-related challenges more effectively

[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization’s scenario analysis.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

☑ IEA NZE 2050

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Policy

☑ Market

☑ Reputation

☑ Technology

☑ Liability

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2019

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

Finance and insurance

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Consumer sentiment

☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

☑ Methodologies and expectations for science-based targets

Direct interaction with climate

☑ On asset values, on the corporate

☑ Perception of efficacy of climate regime

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

TUBACEX's climate risk and opportunity analysis is grounded in several key assumptions. These include the implementation of robust policies such as the European Green Deal and Spain's National Integrated Energy and Climate Plan (PNIEC), both aimed at achieving net-zero emissions by 2050. It is anticipated that global and regional economic growth will align with a transition to low-carbon economies, though with varying impacts across different sectors. IPCC climate projections indicate an increase in extreme weather events and shifts in resource availability, while significant advancements in clean technologies and a greater adoption of renewable energy sources are expected.The primary uncertainties involve the effectiveness of these policies, the speed of technological progress, and the dynamics of the global and local economies. Constraints arise from the reliance on evolving projections and data, which, while informed by the latest models and research, are inherently subject to change as new information and technologies emerge. Regulatory frameworks and technological advancements may also shift, influencing the assumptions made in the analysis. Despite these factors, TUBACEX remains well-positioned to address these uncertainties through adaptive planning and rigorous scenario analysis, ensuring a robust and forward-looking approach to climate risk and opportunity management.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for TUBACEX's climate risk and opportunity analysis is meticulously grounded in a strategic and well-structured approach. The choice leverages the latest projections from the IPCC's Sixth Assessment Report (AR6) and the Shared Socioeconomic Pathways (SSP), which offer a range of future socioeconomic scenarios. By integrating different scenarios such as SSP1-2.6, SSP2-4.5 and SSP5-8.5, TUBACEX can evaluate a broad spectrum of future possibilities, from ambitious climate action to high-emission trajectories. This approach ensures that the company is well-prepared for a range of potential outcomes, enhancing its resilience and strategic alignment with global climate objectives. Notably, TUBACEX has focused on the SSP1-2.6 and IEA Net Zero Scenario for assessing transition risks and climate opportunities. These scenarios, which involve significant efforts to reduce greenhouse gas emissions, align closely with global climate ambitions. The inclusion of International Energy Agency (IEA) scenarios, regional policies like the European Green Deal, and Spain's National Integrated Energy and Climate Plan (PNIEC) provides a comprehensive evaluation of both global and local transition risks and opportunities. This diverse selection of scenarios supports TUBACEX in navigating a complex and evolving climate landscape, ensuring a robust and adaptive approach to managing climate-related risks and opportunities.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 2.6

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP1

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2015

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025
☑ 2030
☑ 2040
☑ 2050
☑ 2060
☑ 2070
☑ 2080
☑ 2090
☑ 2100

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature
☑ Changes in ecosystem services provision
☑ Speed of change (to state of nature and/or ecosystem services)

Finance and insurance

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Consumer sentiment
☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

☑ Global regulation
☑ Level of action (from local to global)
☑ Global targets
☑ Methodologies and expectations for science-based targets

Direct interaction with climate

☑ On asset values, on the corporate
☑ Perception of efficacy of climate regime

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

TUBACEX's climate risk and opportunity analysis is grounded in several key assumptions. These include the implementation of robust policies such as the European Green Deal and Spain's National Integrated Energy and Climate Plan (PNIEC), both aimed at achieving net-zero emissions by 2050. It is anticipated that global and regional economic growth will align with a transition to low-carbon economies, though with varying impacts across different sectors. IPCC climate projections indicate an increase in extreme weather events and shifts in resource availability, while significant advancements in clean technologies and a greater adoption of renewable energy sources are expected.The primary uncertainties involve the effectiveness of these policies, the speed of technological progress, and the dynamics of the global and local economies. Constraints arise from the reliance on evolving projections and data, which, while informed by the latest models and research, are inherently subject to change as new information and technologies emerge. Regulatory frameworks and technological advancements may also shift, influencing the assumptions made in the analysis. Despite these factors, TUBACEX remains well-positioned to address these uncertainties through adaptive planning and rigorous scenario analysis, ensuring a robust and forward-looking approach to climate risk and opportunity management.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for TUBACEX's climate risk and opportunity analysis is meticulously grounded in a strategic and well-structured approach. The choice leverages the latest projections from the IPCC's Sixth Assessment Report (AR6) and the Shared Socioeconomic Pathways (SSP), which offer a range of future socioeconomic scenarios. By integrating different scenarios such as SSP1-2.6 SSP2-4.5, and SSP5-8.5TUBACEX can evaluate a broad spectrum of future possibilities, from ambitious climate action to high-emission trajectories. This approach ensures that the company is well-prepared for a range of potential outcomes, enhancing its resilience and strategic alignment with global climate objectives. Notably, TUBACEX has focused on the SSP1-2.6 and IEA Net Zero Scenario for assessing transition risks and climate opportunities. These scenarios, which involve significant efforts to reduce greenhouse gas emissions, align closely with global climate ambitions. The inclusion of International Energy Agency (IEA) scenarios, regional policies like the European Green Deal, and Spain's National Integrated Energy and Climate Plan (PNIEC) provides a comprehensive evaluation of both global and local transition risks and opportunities. This diverse selection of scenarios supports TUBACEX in navigating a complex and evolving climate landscape, ensuring a robust and adaptive approach to managing climate-related risks and opportunities.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 4.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP2

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 2.5ºC - 2.9ºC

(5.1.1.7) Reference year

2015

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2070

☑ 2080

☑ 2040
☑ 2050
☑ 2060
☑ 2090
☑ 2100

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature
☑ Changes in ecosystem services provision
☑ Speed of change (to state of nature and/or ecosystem services)

Finance and insurance

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Consumer sentiment
☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

☑ Global regulation
☑ Level of action (from local to global)
☑ Global targets
☑ Methodologies and expectations for science-based targets

Direct interaction with climate

☑ On asset values, on the corporate
☑ Perception of efficacy of climate regime

Macro and microeconomy

☑ Domestic growth
☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

TUBACEX's climate risk and opportunity analysis is grounded in several key assumptions. These include the implementation of robust policies such as the European Green Deal and Spain's National Integrated Energy and Climate Plan (PNIEC), both aimed at achieving net-zero emissions by 2050. It is anticipated that global and regional economic growth will align with a transition to low-carbon economies, though with varying impacts across different sectors. IPCC climate projections indicate an increase in extreme weather events and shifts in resource availability, while significant advancements in clean technologies and a greater adoption of renewable energy sources are expected.The primary uncertainties involve the effectiveness of these policies, the speed of technological progress, and the dynamics of the global and local economies. Constraints arise from the reliance on evolving projections and data, which, while informed by the latest models and research, are inherently subject to change as new information and technologies emerge. Regulatory frameworks and technological advancements may also shift, influencing the assumptions made in the analysis. Despite these factors, TUBACEX remains well-positioned to address these uncertainties through adaptive planning and rigorous scenario analysis, ensuring a robust and forward-looking approach to climate risk and opportunity management.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for TUBACEX's climate risk and opportunity analysis is meticulously grounded in a strategic and well-structured approach. The choice leverages the latest projections from the IPCC's Sixth Assessment Report (AR6) and the Shared Socioeconomic Pathways (SSP), which offer a range of future socioeconomic scenarios. The SSP2-4.5 scenario has been considered, as it is a baseline scenario that is consistent with historical patterns for physical risk assessment, in which some countries make progress in reducing emissions while others do not. By integrating SSP2-4.5 alongside other scenarios such as SSP1-2.6 and SSP5-8.5, TUBACEX can evaluate a broad spectrum of future possibilities, from ambitious climate action to high-emission trajectories. This approach ensures that the company is well-prepared for a range of potential outcomes, enhancing its resilience and strategic alignment with global climate objectives. The selection of scenarios for TUBACEX's climate risk and opportunity analysis is meticulously grounded in a strategic and well-structured approach. The choice leverages the latest projections from the IPCC's Sixth Assessment Report (AR6) and the Shared Socioeconomic Pathways (SSP), which offer a range of future socioeconomic scenarios. The SSP3-7.0 scenario has been considered as a high-emission intermediate pathway, marked by limited commitment to climate action and a strong reliance on fossil fuels. By integrating SSP3-7.0 alongside other scenarios such as SSP2-4.5 and SSP5-8.5, TUBACEX can evaluate a broad spectrum of future possibilities, from ambitious climate action to high-emission trajectories. This approach ensures that the company is well-prepared for a range of potential outcomes, enhancing its resilience and strategic alignment with global climate objectives.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 7.0

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP3

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 3.5ºC - 3.9ºC

(5.1.1.7) Reference year

2015

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2070

☑ 2080

☑ 2090

☑ 2050
☑ 2060
☑ 2100

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature
☑ Speed of change (to state of nature and/or ecosystem services)

Finance and insurance

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Consumer sentiment
☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

☑ Global regulation
☑ Level of action (from local to global)
☑ Global targets
☑ Methodologies and expectations for science-based targets

Direct interaction with climate

☑ On asset values, on the corporate

Macro and microeconomy

☑ Domestic growth
☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

TUBACEX's climate risk and opportunity analysis is grounded in several key assumptions. These include the implementation of robust policies such as the European Green Deal and Spain's National Integrated Energy and Climate Plan (PNIEC), both aimed at achieving net-zero emissions by 2050. It is anticipated that global and

regional economic growth will align with a transition to low-carbon economies, though with varying impacts across different sectors. IPCC climate projections indicate an increase in extreme weather events and shifts in resource availability, while significant advancements in clean technologies and a greater adoption of renewable energy sources are expected.The primary uncertainties involve the effectiveness of these policies, the speed of technological progress, and the dynamics of the global and local economies. Constraints arise from the reliance on evolving projections and data, which, while informed by the latest models and research, are inherently subject to change as new information and technologies emerge. Regulatory frameworks and technological advancements may also shift, influencing the assumptions made in the analysis. Despite these factors, TUBACEX remains well-positioned to address these uncertainties through adaptive planning and rigorous scenario analysis, ensuring a robust and forward-looking approach to climate risk and opportunity management.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for TUBACEX's climate risk and opportunity analysis is meticulously grounded in a strategic and well-structured approach. The choice leverages the latest projections from the IPCC's Sixth Assessment Report (AR6) and the Shared Socioeconomic Pathways (SSP), which offer a range of future socioeconomic scenarios. The SSP3-7.0 scenario has been considered as a high-emission intermediate pathway, marked by limited commitment to climate action and a strong reliance on fossil fuels. By integrating SSP3-7.0 alongside other scenarios such as SSP2-4.5 and SSP5-8.5, TUBACEX can evaluate a broad spectrum of future possibilities, from ambitious climate action to high-emission trajectories. This approach ensures that the company is well-prepared for a range of potential outcomes, enhancing its resilience and strategic alignment with global climate objectives.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 8.5

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ SSP5

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 4.0°C and above

(5.1.1.7) Reference year

2015

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2050

☑ 2060

☑ 2070

☑ 2080

☑ 2090

☑ 2100

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Changes in ecosystem services provision

☑ Speed of change (to state of nature and/or ecosystem services)

Finance and insurance

☑ Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

☑ Consumer sentiment

☑ Sensitivity to inequity of nature impacts

Regulators, legal and policy regimes

☑ Global regulation

☑ Level of action (from local to global)

☑ Global targets

☑ Methodologies and expectations for science-based targets

Direct interaction with climate

☑ On asset values, on the corporate

Macro and microeconomy

☑ Domestic growth

☑ Globalizing markets

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

TUBACEX's climate risk and opportunity analysis is grounded in several key assumptions. These include the implementation of robust policies such as the European Green Deal and Spain's National Integrated Energy and Climate Plan (PNIEC), both aimed at achieving net-zero emissions by 2050. It is anticipated that global and regional economic growth will align with a transition to low-carbon economies, though with varying impacts across different sectors. IPCC climate projections indicate an increase in extreme weather events and shifts in resource availability, while significant advancements in clean technologies and a greater adoption of renewable energy sources are expected.The primary uncertainties involve the effectiveness of these policies, the speed of technological progress, and the dynamics of the global and local economies. Constraints arise from the reliance on evolving projections and data, which, while informed by the latest models and research, are inherently subject to change as new information and technologies emerge. Regulatory frameworks and technological advancements may also shift, influencing the assumptions made in the analysis. Despite these factors, TUBACEX remains well-positioned to address these uncertainties through adaptive planning and rigorous scenario analysis, ensuring a robust and forward-looking approach to climate risk and opportunity management.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for TUBACEX's climate risk and opportunity analysis is meticulously grounded in a strategic and well-structured approach. The choice leverages the latest projections from the IPCC's Sixth Assessment Report (AR6) and the Shared Socioeconomic Pathways (SSP), which offer a range of future socioeconomic scenarios. Notably, TUBACEX has focused on the SSP5-8.5 scenario due to its alignment with current global trends and the need to address high-emission risks comprehensively. SSP5-8.5 represents a pathway with high reliance on fossil fuels and significant greenhouse gas emissions, reflecting a scenario of continued high emissions and associated risks. This scenario was chosen to ensure a thorough assessment of potential extreme climate impacts, which is crucial for robust risk management and strategic planning. By integrating SSP5-8.5 alongside other scenarios such as SSP2-4.5, and SP3- 7.0. TUBACEX can evaluate a broad spectrum of future possibilities, from ambitious climate action to high-emission trajectories. This approach ensures that the company is well-prepared for a range of potential outcomes, enhancing its resilience and strategic alignment with global climate objectives.
[Add row]

(5.1.2) Provide details of the outcomes of your organization's scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply
☑ Risk and opportunities identification, assessment and management
☑ Strategy and financial planning
☑ Resilience of business model and strategy
☑ Capacity building
☑ Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:
☑ Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

TUBACEX employs scenario analysis as a strategic tool to evaluate how different future scenarios could impact the organization. This approach enables TUBACEX to identify potential risks that may arise and uncover opportunities that the company can capitalize on. By doing so, the organization enhances its resilience, by ensuring better preparedness for uncertainties, developing strategies to mitigate risks or seize opportunities, and ultimately improving its capacity to adapt to environmental changes. The scenario selection process considers various socio-economic futures: 1. Sustainability and Climate Neutrality Scenario: This scenario focuses on significant efforts to reduce greenhouse gas emissions, assessing transition risks and climate-related opportunities. 2. Baseline Scenario:

This scenario aligns with historical patterns for physical risk assessment, where some countries make progress in reducing emissions while others lag. 3. High Fossil Fuel Dependence Scenarios: Two scenarios are selected, one representing an intermediate level of dependence on fossil fuels, and the other depicting a more pessimistic outlook with higher fossil fuel reliance and greater physical risks. The four selected scenarios and their implications are as follows: 1. Paris Agreement, Climate Neutrality Goal The scenario analysis based on Paris Agreement Objective, Climate Neutrality (IPCC SSP 1-2.6; IEA Net Zero Emissions by 2050) quantify potential risks and opportunities in three different time horizons. The main implications of this scenario are: -Ambitious policies and legislation to stimulate green transition in the technological, economic and energy sectors (e.g. Tightening of the EU ETS). -Limitation of global warming in line with the Paris Agreement (1.5C, with limited overshoot) Achievement of net zero CO2 emissions around 2050. -Social shift towards more environmentally sustainable systems, enabling achievement of development goal commitments, reducing inequality and resource and energy consumption. -Low dependence on fossil fuels and high share of renewable energy (including bioenergy) as a result of the implementation of energy efficiency measures and behavioral changes. -Extreme weather conditions are increasing compared to historical levels, but their magnitude, frequency and impacts are less severe than in a scenario of high GHG emissions. 2. Trend Scenario (IPCC SSP2 -4.5). A balanced energy development is achieved, although there is still dependence on fossil fuels. It represents an intermediate emissions pathway compared to other scenarios 3. High GHG Emissions Scenario (IPCC SSP3 -7.0) Progress towards a sustainable model is slow. CO2 emissions remain at current levels. This scenario assumes high population growth, slow economic development in some regions and predominant use of fossil fuels resulting in high GHG emissions 4. Very High GHG Emissions Scenario (IPCC SSP5 -8.5) Some climate policies are in place in some jurisdictions, but on a global scale efforts are insufficient to stop significant global warming, leading to high physical risk. -Economic and social development is driven by the exploitation of abundant fossil fuel resources and intensive resource and energy use. For physical risk analysis, TUBACEX has prioritized the SSP5-8.5 scenario, aligning with current global trends and addressing high-emission risks comprehensively. This choice ensures a thorough evaluation of potential extreme climate impacts, critical for effective risk management and strategic planning. The analysis based on this worst-case scenario (RCP8.5) has allowed TUBACEX to quantify potential risks at each facility and develop specific action plans, along with new guidelines for designing and constructing future facilities to minimize financial impacts, such as increased insurance premiums. Regarding transition risks and opportunities, TUBACEX has focused on the Paris Agreement, Climate Neutrality Goal scenario. This scenario is the foundation for all climate policies and objectives outlined in the international framework, under the premise of achieving the Paris Agreement targets and reaching net zero by 2050. The risk analysis based on this neutrality scenario has helped TUBACEX identify significant risks, such as policy shifts and market changes, while also revealing opportunities with positive business impacts. This has enabled the company to implement measures to mitigate these risks and capitalize on potential opportunities.
[Fixed row]

(5.2) Does your organization’s strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

☑ Yes, we have a climate transition plan which aligns with a 1.5°C world

(5.2.3) Publicly available climate transition plan

Select from:

☑ Yes

(5.2.4) Plan explicitly commits to cease all spending on, and revenue generation from, activities that contribute to fossil fuel expansion

Select from:

☑ No, and we do not plan to add an explicit commitment within the next two years

(5.2.6) Explain why your organization does not explicitly commit to cease all spending on and revenue generation from activities that contribute to fossil fuel expansion

Tubacex understands the importance of moving towards a more sustainable future and reducing our reliance on fossil fuels. However, we believe that this transition should be undertaken gradually and responsibly to ensure both economic stability and a reliable energy supply. We are committed to improving efficiency and reducing emissions in our current operations. By maintaining a balanced and flexible approach, we do not only protect the interests of our customers and employees but also make a significant contribution to a fair and sustainable energy transition, ensuring that the needs of all stakeholders are considered and minimizing social and economic impacts.

(5.2.7) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

☑ Our climate transition plan is voted on at AGMs and we also have an additional feedback mechanism in place

(5.2.8) Description of feedback mechanism

Tubacex transition plan is included in our business strategy that is communicated through different channels to all our stakeholders, including shareholders, financial institutions, employees, suppliers, clients, and society in general. The FY2023 results for Tubacex were presented during a live webcast, which was open to the public. The webcast is available for viewing on our website Microsoft PowerPoint - TUBACEX_FY 2023_Presentación de resultados_28.02.2024 • Shareholders: They review and vote the management report in the AGM • Board: Reviews the strategy and the sustainability plan in the strategy commission and in the Sustainability and Good governance commission • Investors and financial institutions: Regular bilateral meetings and roadshows. During 2023 it was held the Capital Markets Day. tubacex.com/wp-content/uploads/2023/11/211123-Tubacex-equity-story.pdf • Suppliers: Two feedback channels i) yearly supplier days where the strategy is presented, and feedback is gathered ii) regular bilateral meetings with key suppliers • Clients: i) regular bilateral meetings with key clients, ii) annual satisfaction surveys including topics on sustainability • Employees: i) Town hall meeting in each business unit ii) Suggestion schemes included in our production operating model (TxPS) • Governments: Periodic meeting with local and regional governments and public agencies in the regions we operate • Society: Social media input analysis

(5.2.9) Frequency of feedback collection

Select from:

☑ More frequently than annually

(5.2.10) Description of key assumptions and dependencies on which the transition plan relies

In developing our transition plan, we have made several key assumptions. First, we project sustained growth in demand for sustainable and high-quality products, particularly driven by the increasing adoption of advanced materials in the energy transition. This context has enabled Tubacex's Low Carbon Business Unit to expand its operations across various industries where our advanced materials will be pivotal. Second, we anticipate that regulatory changes will continue to favor sustainable practices, based on our ongoing engagement with government authorities. Third, we expect technological advancements to enhance our operational efficiency and product innovation, supported by our continuous investment in research and development.The successful implementation of our plan depends on several critical factors, including supportive government policies, active cooperation from stakeholders, and the availability of essential resources. Our Low Carbon Business Unit focuses on several strategic areas, such as hydrogen applications, carbon capture, and circular economy initiatives. This includes developing specific materials for hydrogen, high-pressure stainless steel tubing, components for electrolyzers, and unique solutions for carbon capture and CO2 injection. Our approach also encompasses innovations in steel grades, special products for fertilizers, and waste-to-energy applications. This integrated approach ensures that our transition plan aligns with our business strategy and is executed efficiently..

(5.2.11) Description of progress against transition plan disclosed in current or previous reporting period

TUBACEX's business strategy is developed in three key phases during this Strategic Plan. In the first phase, it will boost its presence in terms of its traditional products, focusing on accompanying existing customers in their decarbonization processes through products and services that minimize their environmental impact and increase efficiency. In parallel, the company will continue to consolidate its position as a leader in highly profitable segments. The second phase, which coexists with the first, focuses on low-emission energies. Here, TUBACEX works on the development of innovative solutions for the generation, storage and transportation of energy in emerging markets, such as hydrogen and CCS (Carbon Capture and Storage). This stage responds to the growing importance of clean energy in the transition to a more sustainable future. Finally, the third phase focuses on diversification and growth. During this stage, the company will analyze organic and inorganic expansion opportunities in the power generation and mobility sectors, with an emphasis on driving new businesses.

(5.2.13) Other environmental issues that your climate transition plan considers

Select all that apply

☑ No other environmental issue considered

[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

☑ Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

☑ Products and services

☑ Upstream/downstream value chain

☑ Investment in R&D

☑ Operations

[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Increasing carbon prices through taxes or other mechanisms may impact both our suppliers' and our own operating costs. Recent legislations, such as the Spanish Climate Change and Energy Transition Law (121/000019) demand that companies demonstrate excellence in circular economy. These constraints constitute a potential regulatory risk to our products and services, and a financial risk to our operations. However, they also represent an opportunity to promote the benefits of a 100% renewable product such as stainless steel. To act upon these risks, we defined in 2019 a Sustainability Strategy Roadmap, that includes the supply chain as one of the main priority lines, including actions like: i) Development of new valorisation technologies to reduce the volume of waste sent to landfills by 80% by 2025

and 95% by 2030 (starting point is 60% during 2019). To achieve this target Tubacex is partnering with other companies in the sector and world class suppliers to build a slag recycling plant to covert waste into green asphalt. ii) Green electricity sourcing: TUBACEX has initiated the process of analysis and negotiation for the extension of the long-term electricity supply agreement (PPA) for renewable energy sources, currently active in the Spanish plants, to the rest of the business units (European ones already sourcing part of green electricity) In addition, there is an agreement for the supply of non-fossil fuel at the American plants. iii) Promote ESG criteria in the selection, evaluation, and continuous development of our suppliers. In 2023 we updated our environmental policy and in 2024 we are redefining our evaluation model for suppliers, considering ESG parameters, that has reached in 2023 the application to more than 800 suppliers. The TUBACEX Supplier Quality Manual establishes compliance with international standards in terms of respect for the environment in order to form part of the company's panel of suppliers. Among these, the following stand out: ISO 9001 or alternatively QS-9000, VDA certification, ISO / TS 16949 or EAQF or API Q1 may be accepted; ISO 14001 (especially suppliers included in the ERS list "Environmental Risk Suppliers" must have obtained this certificate or, alternatively, present a plan to obtain ISO 14001 within the following 24 months), in addition to other certifications in terms of occupational risk prevention. In order to face all challenges affecting the value chain (scope 3 reductions and regulatory landscape affecting to the whole value chain), Tubacex has started in 2024 a project to redefine the homologation process

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Identified risks and opportunities related to market, regulation, technology, or physical climate change, will require changes from our existing partners in the supply chain. As we move forward with our strategy to reduce our internal footprint, we will need our supplier to follow us in this road. Scope 3 emissions, mostly upstream, are the largest in our footprint. As a result of this we have focused on i) Engage with our suppliers to promote commitment with the Paris objectives. We have reached more than 800 key suppliers (90% of purchase volume) and requested information on their sustainability policies including climate change. ii) Developed new supply chains, with companies specialized in waste management and circularity to increase the already high percentage of renewable material we use (65.70% in 2022 in our steel making company, and 26.65% in the group, but most of the remaining 73.35% is steel produced with renewable materials). As a result of these new supply chains in 2023 we avoided more than 14.000tn of landfill in relation to previous year, while reduced more than 800tn our raw material procurement, contributing to a reduction of 3000tn of emissions) iii) Develop new supply chains related to energy efficiency and decarbonization of energy. As an example, we are implementing digital energy management solutions and identify and implement energy saving initiatives.

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

Tubacex carries out a high level of R&D activity with a strong focus on: -Products targeting the green economy (i.e. products for the hydrogen value chain). - CO2 emissions reduction, either targeting better efficiency or gas market development. - Circular economy, mainly dedicated to production processes improvement by waste reduction or valorisation. The program is reviewed and adjusted together with the company strategy, therefore evolving to adapt to new inputs. It should be noted that in 2023, 80% of TUBACEX's innovation efforts were focused on developing solutions that reduce its customers' emissions, promote the circular economy or improve its environmental performance There are projects related to new products development, new technologies, performance improvement, and basic research within the R&D program.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

As part of our risk assessment process, we identified that increasing carbon prices through taxes or other mechanisms may impact our operating costs and that ambitious reduction targets in both our internal and external emissions are needed to support our reputation with different stakeholders (clients, investors, banks, etc.). To respond to these risks, we defined in 2019 a Sustainability Strategy Roadmap, that includes Operations as one of the main priority lines, including actions like: - Improve the scrap recovery, classification, and sourcing to increase the scrap content of our steel making operations, reducing the use of pure metals and ferroalloys, thus significantly reducing our scope 3 emissions - Energy Efficiency Programme: Launched a global initiative, covering all manufacturing, logistics and commercial sites in the group, to optimize our energy consumption, including an Energy Management System, aligned with ISO 50001 requirements. - Investments in several key processes to improve yields of the hold and cold forming of hollows and tubes to reduce raw material consumptions.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☑ Water

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

The influence of water scarcity on production volumes has significantly shaped our operational strategy. Water is crucial for various industrial processes, including cooling and treatment, and its reduced availability poses a considerable risk of operational disruption, potentially resulting in diminished production output and increased costs. In response, we have implemented closed-loop water systems, enhanced water recovery initiatives, and optimized automation within our processes to ensure efficient water utilization and reduce reliance on external sources. These strategic measures not only protect production capacity but also align with our long-term sustainability objectives by minimizing our environmental footprint and bolstering operational resilience. By effectively managing water resources, we mitigate the risks of disruptions that could adversely impact production and profitability, while ensuring compliance with evolving environmental regulations.
[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

- ☑ Revenues
- ☑ Direct costs
- ☑ Indirect costs
- ☑ Access to capital
- ☑ Capital allocation
- ☑ Capital expenditures
- ☑ Acquisitions and divestments

(5.3.2.2) Effect type

Select all that apply

- ☑ Risks
- ☑ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- ☑ Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

1. Integration into Financial Planning: -Water Scarcity (Physical Risk): We implemented closed-loop water systems and advanced data collection to reduce water usage and mitigate financial impacts of shortages. -Carbon Pricing (Transition Risk): The EU ETS II increases costs, addressed through investments in emission reduction technologies and renewable energy. -Dependence on Fossil Fuels (Transition Risk): Our reliance on fossil fuels for electricity is mitigated by Power Purchase Agreements (PPAs) for green energy and efficiency upgrades. -Carbon Border Adjustment Mechanism (CBAM) (Transition Risk): CBAM introduces reporting requirements and potential cost increases for imports. We are developing systems to manage these new requirements and avoid cost impacts. -Opportunities for Efficiency: We are improving resource efficiency, focusing on water optimization and energy-saving technologies to reduce costs and environmental impact 2. Changes in Resourcing, Resource Allocation, and Funding Plans: We adjust our resourcing strategies to respond to risks. For instance, to manage carbon pricing risks under the EU ETS II, we invest in carbon reduction technologies and renewable energy, reallocating resources accordingly. 3. Case Study: Decarbonization Initiatives at Acería de Álava At Acería de Álava, we've implemented measures like variable speed drives on furnace motors and pressure control systems to reduce Scope 1 emissions. Future initiatives include heat recovery systems and smoke analyzers. This aligns with Tubacex's goal to cut Scope 1 and 2

GHG emissions by 64.32% and Scope 3 by 55.40% by 2030. Significant capital investments support these decarbonization targets. 4. Time Horizons and Financial Planning Impact: Environmental risks influence both short-term and long-term financial planning. Immediate impacts include expenditures on water and energy efficiency. 5. Funding Strategies for Environmental Commitments: We leverage internal capital, green financing, and government subsidies for our environmental initiatives, such as green bonds and financial incentives from the Basque Government, supporting energy efficiency, renewable energy, and emission reduction efforts. Aligned with our climate goals, Tubacex is investing in key areas, including nuclear and aerospace, and expanding into green technologies to secure future grow in the energy transition.

Row 2

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Revenues

☑ Direct costs

☑ Indirect costs

☑ Capital expenditures

(5.3.2.2) Effect type

Select all that apply

☑ Risks

☑ Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

☑ Water

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Water Scarcity (Physical Risk): Water scarcity poses a risk to operational costs. To mitigate this, we have implemented closed-loop water systems and advanced data collection technologies. These efforts reduce water usage, improve efficiency, and help manage the financial impact of potential water shortages. Opportunities for Efficiency: We are optimizing water use as part of our broader resource efficiency strategy. This contributes to cost savings while reducing environmental impact.

Short-Term Financial Planning Impact: Our financial planning includes immediate capital expenditures for water efficiency projects, ensuring we are well-prepared for both current and future water-related challenges.
[Add row]

(5.4) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition	Methodology or framework used to assess alignment with your organization's climate transition	Indicate the level at which you identify the alignment of your spending/revenue with a sustainable finance taxonomy
	Select from: ☑ Yes	*Select all that apply* ☑ A sustainable finance taxonomy	*Select from:* ☑ At both the organization and activity level

[Fixed row]

(5.4.1) Quantify the amount and percentage share of your spending/revenue that is aligned with your organization's climate transition.

Row 1

(5.4.1.1) Methodology or framework used to assess alignment

Select from:
☑ A sustainable finance taxonomy

(5.4.1.2) Taxonomy under which information is being reported

Select from:
☑ EU Taxonomy for Sustainable Activities

(5.4.1.3) Objective under which alignment is being reported

Select from:

☑ Total across climate change mitigation and climate change adaption

(5.4.1.4) Indicate whether you are reporting eligibility information for the selected objective

Select from:

☑ Yes

(5.4.1.5) Financial metric

Select from:

☑ Revenue/Turnover

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

92185000

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

10.81

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

10.81

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

10.81

(5.4.1.10) Percentage share of financial metric that is taxonomy-eligible in the reporting year (%)

10.81

(5.4.1.11) Percentage share of financial metric that is taxonomy non-eligible in the reporting year (%)

89.19

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization's climate transition

TUBACEX has considered steel manufacturing activities (ACERÁLAVA) as eligible, excluding the process of manufacturing tubes and other tubular products included in the last analysis, hence responding to a more precise interpretation of the Directive. For the calculation of the indicators, ACERÁLAVA's sales to third parties will be considered eligible, as will sales of the steel trading companies (TSS) (eligible activity) in accordance with the aligned analysis carried out, as opposed to other products (non-eligible activity), having considered TSS sales "by origin of the material" (ACERÁLAVA) for this purpose. Items corresponding to ACERÁLAVA and the proportion of TSS used for the related activity are considered for CapEx and OpEx.

Row 2

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☑ A sustainable finance taxonomy

(5.4.1.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.1.3) Objective under which alignment is being reported

Select from:

☑ Total across climate change mitigation and climate change adaption

(5.4.1.4) Indicate whether you are reporting eligibility information for the selected objective

Select from:

☑ Yes

(5.4.1.5) Financial metric

Select from:

☑ CAPEX

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

3264000

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

3.75

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

3.75

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

3.75

(5.4.1.10) Percentage share of financial metric that is taxonomy-eligible in the reporting year (%)

3.75

(5.4.1.11) Percentage share of financial metric that is taxonomy non-eligible in the reporting year (%)

96.25

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization's climate transition

TUBACEX has considered steel manufacturing activities (ACERÁLAVA) as eligible, excluding the process of manufacturing tubes and other tubular products included in the last analysis, hence responding to a more precise interpretation of the Directive. For the calculation of the indicators, ACERÁLAVA's sales to third parties will be considered eligible, as will sales of the steel trading companies (TSS) (eligible activity) in accordance with the aligned analysis carried out, as opposed to other products (non-eligible activity), having considered TSS sales "by origin of the material" (ACERÁLAVA) for this purpose. Items corresponding to ACERÁLAVA and the proportion of TSS used for the related activity are considered for CapEx and OpEx.

Row 3

(5.4.1.1) Methodology or framework used to assess alignment

Select from:

☑ A sustainable finance taxonomy

(5.4.1.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.1.3) Objective under which alignment is being reported

Select from:

☑ Total across climate change mitigation and climate change adaption

(5.4.1.4) Indicate whether you are reporting eligibility information for the selected objective

Select from:

☑ Yes

(5.4.1.5) Financial metric

Select from:

☑ OPEX

(5.4.1.6) Amount of selected financial metric that is aligned in the reporting year (currency)

4845080

(5.4.1.7) Percentage share of selected financial metric aligned in the reporting year (%)

21.28

(5.4.1.8) Percentage share of selected financial metric planned to align in 2025 (%)

21.28

(5.4.1.9) Percentage share of selected financial metric planned to align in 2030 (%)

21.28

(5.4.1.10) Percentage share of financial metric that is taxonomy-eligible in the reporting year (%)

21.28

(5.4.1.11) Percentage share of financial metric that is taxonomy non-eligible in the reporting year (%)

78.72

(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization's climate transition

TUBACEX has considered steel manufacturing activities (ACERÁLAVA) as eligible, excluding the process of manufacturing tubes and other tubular products included in the last analysis, hence responding to a more precise interpretation of the Directive. For the calculation of the indicators, ACERÁLAVA's sales to third parties will be considered eligible, as will sales of the steel trading companies (TSS) (eligible activity) in accordance with the aligned analysis carried out, as opposed to other products (non-eligible activity), having considered TSS sales "by origin of the material" (ACERÁLAVA) for this purpose. Items corresponding to ACERÁLAVA and the proportion of TSS used for the related activity are considered for CapEx and OpEx.
[Add row]

(5.4.2) Quantify the percentage share of your spending/revenue that was associated with eligible and aligned activities under the sustainable finance taxonomy in the reporting year.

Row 1

(5.4.2.1) Economic activity

Select from:
☑ Manufacture of iron and steel

(5.4.2.2) Taxonomy under which information is being reported

Select from:

☑ EU Taxonomy for Sustainable Activities

(5.4.2.3) Taxonomy alignment

Select from:

☑ Taxonomy-aligned

(5.4.2.4) Financial metrics

Select all that apply

☑ Turnover

☑ CAPEX

☑ OPEX

(5.4.2.5) Types of substantial contribution

Select all that apply

☑ Own performance

☑ Transitional activity

☑ Activity enabling mitigation

☑ Activity enabling adaptation

(5.4.2.6) Taxonomy-aligned turnover from this activity in the reporting year (currency)

92185000

(5.4.2.7) Taxonomy-aligned turnover from this activity as % of total turnover in the reporting year

10.81

(5.4.2.8) Taxonomy-aligned turnover from this activity that substantially contributed to climate change mitigation as a % of total turnover in the reporting year

10.81

(5.4.2.9) Taxonomy-aligned turnover from this activity that substantially contributed to climate change adaptation as a % of total turnover in the reporting year

0

(5.4.2.13) Taxonomy-aligned CAPEX from this activity in the reporting year (currency)

3264000

(5.4.2.14) Taxonomy-aligned CAPEX from this activity as % of total CAPEX in the reporting year

3.75

(5.4.2.15) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change mitigation as a % of total CAPEX in the reporting year

0

(5.4.2.16) Taxonomy-aligned CAPEX from this activity that substantially contributed to climate change adaptation as a % of total CAPEX in the reporting year

0

(5.4.2.20) Taxonomy-aligned OPEX from this activity in the reporting year (currency)

4845080

(5.4.2.21) Taxonomy-aligned OPEX from this activity as % of total OPEX in the reporting year

21.28

(5.4.2.22) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change mitigation as a % of total OPEX in the reporting year

0

(5.4.2.23) Taxonomy-aligned OPEX from this activity that substantially contributed to climate change adaptation as a % of total OPEX in the reporting year

0

(5.4.2.27) Calculation methodology and supporting information

The scope of the alignment assessment focuses on the activity of "manufacture of iron and steel" corresponding to the activity carried out by the Group's steel plant, ACERÁLAVA (NACE 24.10) and the products from this plant marketed through the trading company TSS. trading company TSS. This change in criteria with respect to that made in 2021 corresponds to a more reliable interpretation of the legislation. Thus, for the calculation of the indicators, ACERÁLAVA's sales to third parties will be considered eligible and, in accordance with the analysis carried out, aligned, as well as the sales of the sales of steel trading companies (TSS) (eligible activity) as opposed to other products (non-eligible activity), having (non-eligible activity), taking into account the sales of TSS 'by origin of the material' (ACERÁLAVA, ACERÁLAVA and TSS). material" (ACERÁLAVA). For Capex and opex, the items taken are those corresponding to the ACERÁLAVA company and the proportion of TSS used for the related activity

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

With the European Commission approval of the Environmental Delegated Regulation on June 13, 2023, defining the complementary activities under the four remaining environmental objectives (sustainable use and protection of water and marine resources; transition to a circular economy; prevention and control of pollution; and protection and recovery of biodiversity and ecosystems), TUBACEX has analyzed whether its activities are covered by this Delegated Regulation, whereby it is excluded as it does not adhere to the description of the incorporated activities. In line with the criteria defined for the eligibility analysis, the scope of the alignment assessment focuses on the activity related to the manufacture of long stainless steel products developed by the Group's steelworks, ACERÁLAVA and the products originating from this plant and sold through TSS. Compliance in this case is due to the consumption of scrap in EAF furnaces, as it exceeds 70% of fine steel production In line with the criteria defined for the eligibility analysis, the scope of the alignment assessment focuses on the activity related to the manufacture of long stainless steel products developed by the Group's steelworks, ACERÁLAVA and the products originating from this plant and sold through TSS. Compliance in this case is due to the consumption of scrap in EAF furnaces, as it exceeds "70% of fine steel production*.*

(5.4.2.30) Do no significant harm requirements met

Select from:

☑ Yes

(5.4.2.31) Details of do no significant harm analysis

CLIMATE CHANGE ADAPTATION: The assessment (identification, classification and assessment) of the physical risks related to CC has been carried out, identifying and materializing the vulnerabilities, as well as the solutions for the adaptation of the activities under analysis to them. The risk assessment includes climate projections adapted to the characteristics of the activities under analysis There is an implementation plan for the planned solutions. WATER AND MARINE RESOURCES An assessment of water risks has been carried out (both as a resource and as a recipient). A management plan has been drawn up for water use and protection. INTEGRATED POLLUTION PREVENTION AND CONTROL ACERÁLAVA uses Nickel in its manufacturing process; a substance included in Annex XVII of Regulation (EC) No 1907/2006, complying with the requirements established for its use. The activity is carried out in accordance with the best available technologies (BAT) in steel production in accordance with Directive 2010/75/EU of the European Parliament and of the Council, on industrial emissions. More specifically, in accordance with the BATs related to the management of atmospheric emissions for steel manufacturing and casting processes in basic oxygen converters and/or electric arc furnace casting processes. Emissions are below the legal emission limits set by Directive (EU) 2015/2193 for the steel industry1 BIODIVERSITY AND ECOSYSTEMS ACERÁLAVA has carried out environmental impact assessments, including an assessment of the biodiversity and ecosystems. The methodology applied in the Environmental Risk Analysis corresponds to that established in the UNE 150008:2008 Standard on Environmental Risk Analysis and Assessment, with regard to the performance of risk analysis, in accordance with the provisions of Royal Decree 2090/2008 on Environmental Responsibility. In the case of warehouses that form part of TSS, there is no significant impact on the environment as a result of the activity developed. In the case of impact on the biodiversity, they are located in industrial areas that carry out their corresponding environmental impact analysis and are therefore, outside of any area considered protected. Although in the 2023 materiality analysis, biodiversity has not been considered a material aspect, TUBACEX has incorporated this element in its environmental risk analysis.

(5.4.2.32) Minimum safeguards compliance requirements met

Select from:

☑ Yes

(5.4.2.33) Attach any supporting evidence

2023-Sustainability-Report (1).pdf
[Add row]

(5.4.3) Provide any additional contextual and/or verification/assurance information relevant to your organization's taxonomy alignment.

(5.4.3.1) Details of minimum safeguards analysis

Occupational Safety and Health Policy: TUBACEX is guided by the principles of the Universal Declaration of Human Rights, the International Labor Organization (ILO), the OECD Guidelines, and the United Nations Global Compact. In December 2023, the organization launched a new Occupational Health and Safety policy, emphasizing its commitment to reducing the impact of its activities on human resources. The relevant plants have an Occupational Risk Prevention Program certified under ISO 45001. Human Rights Commitment: TUBACEX complies with national and international human rights frameworks, supporting the Ten Principles of the UN Global Compact and the ILO's Declaration on Fundamental Principles and Rights at Work. The company adheres to all applicable laws in its operational regions. In December 2023, TUBACEX introduced a Human Rights general policy, signed by the Board of Directors, which includes internal and external analysis processes for potential impacts. A governance system with responsibilities assigned to Audit and Compliance Committees and a Sustainability Committee has been established, along with a whistleblower channel for reporting non-compliances. A Due Diligence in Human Rights project will apply to all Group companies and key suppliers starting in 2024. Anti-Corruption and Bribery Policies: TUBACEX strictly adheres to regulations aimed at preventing and combating corruption. The company promotes its Code of Conduct and extends this commitment to all associated companies and partners. The Audit and Compliance Committee monitors compliance with legal standards and oversees ethical conduct within the Group. Tax Policy Commitment: The Tubacex Group is committed to good corporate governance and making a positive contribution to society and the economy. In December 2023, it updated its Corporate Tax Policy to reflect its tax strategy, ensuring the management of financial and non-financial risks while adhering to good tax practices. Fair Competition: TUBACEX promotes a governance model that encourages ethical business practices and compliance with national and international laws in all markets. The company is committed to fair competition, as outlined in its Code of Conduct, and communicates appropriate behaviors to its employees through accessible channels.

(5.4.3.2) Additional contextual information relevant to your taxonomy accounting

Our report on eligibility and alignment of certain TUBACEX activities with the criteria of the EU Taxonomy are included in an annex to the organization's annual sustainability report. The scope of the alignment assessment focused on the activity related to the manufacture of long stainless steel products developed by the Group's steelworks, ACERÁLAVA (NACE 24.10) and the products originating from this plant and sold through TSS (TUBACEX master distributor). Compliance in this case is due to the consumption of scrap in EAF furnaces, as it exceeds 70% of high-alloy steel production. This report was recently audited by Ernst & Young (EY) auditors, who issued a favorable certificate to the company.

(5.4.3.3) Indicate whether you will be providing verification/assurance information relevant to your taxonomy alignment in question 13.1

Select from:

☑ Yes

[Fixed row]

(5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

(5.5.1) Investment in low-carbon R&D

Select from:

☑ Yes

(5.5.2) Comment

TUBACEX carries out an extensive R&D activity, in the range of 1% over sales. The target of the company is that the effort dedicated to the different aspects of sustainability, mainly energy transition, surpasses 80% of the total expenditure.The figure of 2024 is 89%, and it is expected to remain in that range or higher for the foreseeable future. The vast majority of the R&D program is focused on: A) products targeting the green economy (i.e., products for the hydrogen value chain). – B) CO2 emissions reduction, either targeting better efficiency or CCUS C) circular economy, mainly dedicated to production processes improvement by waste reduction or valorization. In addition, TUBACEX is actively seeking to promote and accelerate emerging technologies in the energy transition field, working with an open innovation approach, by looking for relevant technology innovators, and partnering for the industrialization and scaling-up phases, to accelerate and multiply their impact. One example is a waste to H2 project, which has been granted by the European Innovation Fund.
[Fixed row]

(5.5.5) Provide details of your organization's investments in low-carbon R&D for steel production activities over the last three years.

Row 1

(5.5.5.1) Technology area

Select from:

☑ Carbon capture, utilization, and storage (CCUS)

(5.5.5.2) Stage of development in the reporting year

Select from:

☑ Applied research and development

(5.5.5.3) Average % of total R&D investment over the last 3 years

33

(5.5.5.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

5000000

(5.5.5.5) Average % of total R&D investment planned over the next 5 years

35

(5.5.5.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

80% R&D efforts are connected to Energy Transition. 38% of the budget in 2024 is related to CCUS and CO2 emissions reduction. Projects are mainly related to new products for CO2 storage and new heating technologies to reduce natural gas consumption

Row 2

(5.5.5.1) Technology area

Select from:

☑ Other, please specify **:**Green H2 Value Chain

(5.5.5.2) Stage of development in the reporting year

Select from:

☑ Applied research and development

(5.5.5.3) Average % of total R&D investment over the last 3 years

26

(5.5.5.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

5000000

(5.5.5.5) Average % of total R&D investment planned over the next 5 years

30

(5.5.5.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

80% R&D efforts are connected to Energy Transition. 36% of the budget is dedicated to products targeting the green economy (i.e., products for the hydrogen value chain). Projects are mainly related to green hydrogen production via electrolysis, hydrogen storage and use of hydrogen in high temperature furnaces.

Row 3

(5.5.5.1) Technology area

Select from:

☑ Other, please specify **:**Circularity

(5.5.5.2) Stage of development in the reporting year

Select from:

☑ Applied research and development

(5.5.5.3) Average % of total R&D investment over the last 3 years

7

(5.5.5.4) R&D investment figure in the reporting year (unit currency as selected in 1.2) (optional)

5000000

(5.5.5.5) Average % of total R&D investment planned over the next 5 years

25

(5.5.5.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

80% R&D efforts are connected to Energy Transition. 15% of the budget in 2024 is related to circular economy. Most important projects are related to the use of obsolete electrical batteries as source of critical materials for steelmaking process, process of biofuels and waste valorization.
[Add row]

(5.9) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?

(5.9.1) Water-related CAPEX (+/- % change)

100

(5.9.2) Anticipated forward trend for CAPEX (+/- % change)

50.56

(5.9.3) Water-related OPEX (+/- % change)

0

(5.9.4) Anticipated forward trend for OPEX (+/- % change)

0

(5.9.5) Please explain

In the reporting year, the water-related CAPEX has been calculated based on measures that have already been implemented, reflecting our commitment to enhancing our water stewardship practices. For the forthcoming reporting year, we anticipate a Anticipated forward tren for CAPEX that aligns with our ongoing initiatives. Currently, we are not calculating operating expenditure (OPEX); however, we plan to conduct this assessment soon, incorporating measures that are scheduled for implementation.
[Fixed row]

(5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing of environmental externalities	Environmental externality priced
	Select from: ☑ Yes	*Select all that apply* ☑ Carbon

[Fixed row]

(5.10.1) Provide details of your organization’s internal price on carbon.

Row 1

(5.10.1.1) Type of pricing scheme

Select from:

☑ Internal fee

(5.10.1.2) Objectives for implementing internal price

Select all that apply

☑ Conduct cost-benefit analysis

☑ Drive energy efficiency

☑ Incentivize consideration of climate-related issues in risk assessment

☑ Influence strategy and/or financial planning

☑ Reduce upstream value chain emissions

(5.10.1.3) Factors considered when determining the price

Select all that apply

☑ Alignment with the price of allowances under an Emissions Trading Scheme

(5.10.1.4) Calculation methodology and assumptions made in determining the price

Average ETS value of the previous year

(5.10.1.5) Scopes covered

Select all that apply

☑ Scope 1

☑ Scope 2

☑ Scope 3, Category 1 - Purchased goods and services

☑ Scope 3, Category 2 - Capital goods

(5.10.1.6) Pricing approach used – spatial variance

Select from:

☑ Uniform

(5.10.1.8) Pricing approach used – temporal variance

Select from:

☑ Evolutionary

(5.10.1.9) Indicate how you expect the price to change over time

The Price changes over time because it is aligned with the average ETS value

(5.10.1.10) Minimum actual price used (currency per metric ton CO2e)

25

(5.10.1.11) Maximum actual price used (currency per metric ton CO2e)

80

(5.10.1.12) Business decision-making processes the internal price is applied to

Select all that apply

☑ Capital expenditure

☑ Risk management

(5.10.1.13) Internal price is mandatory within business decision-making processes

Select from:

☑ Yes, for some decision-making processes, please specify :CAPEX allocational

(5.10.1.14) % total emissions in the reporting year in selected scopes this internal price covers

93

(5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

☑ Yes

(5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

At the end of the year, the impact of carbon pricing on CAPEX decision-making is reviewed
[Add row]

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Customers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change
Investors and shareholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change
Other value chain stakeholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change

[Fixed row]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

Climate change

(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

Select from:

☑ Yes, we assess the dependencies and/or impacts of our suppliers

(5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

Select all that apply

☑ Contribution to supplier-related Scope 3 emissions

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☑ 1-25%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

The threshold has been fixed employing our estimates for our scope 3 contribution to climate change. We have identified those categories of products that account for over 80% of our scope 3 emission and we asses the overall carbon footprint and product footprint of the suppliers in those categories.

(5.11.1.5) % Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

Select from:

☑ 1-25%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

185
[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ Material sourcing

☑ Procurement spend

☑ Regulatory compliance

(5.11.2.4) Please explain

TUBACEX has a specific management process for its supply chain, which is currently under review in order to further incorporate the expectations of interest groups in terms of sustainability performance and to increase the TUBACEX Group's leverage on its supply chain in terms of sustainability. However, till now now TUBACEX has prioritized its critical suppliers,in terms of spend, business continuity and climate impact, in order to mitigate supply risk while minimizing the overall carbon foootrpint of the organization. To achieve this the group has selected its critical suppliers based on: 1st compliance to regulatory limitations 2nd compliance to Tubacex Group Code of Condust 3rd supply risk mitigation (ESG, Financial, geographical dependency) 4th overall product carbon footprint of the products supplied As previously described, TUBACEX is re-evaluating and defining the supplier assessment methodology to tailor the assessment to sector specific criterion level in terms of social, environmental or governance performance. This process will be focused ad increasing the improvement effort on those suppliers on which Tubacex has more leverage. Therefore it will be complemented by a closed loop of improvement proposals and feedback to suppliers, which will increase the group's pulling effect on its supply chain in terms of sustainability
[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

Climate change

(5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:
☑ Yes, environmental requirements related to this environmental issue are included in our supplier contracts

(5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:
☑ Yes, we have a policy in place for addressing non-compliance

(5.11.5.3) Comment

Our contracts always have a clause stating non-compliance to our ESG practices, or code of conduct can result in the resolution of the contract. However specific ESG clauses are defined according to the supplier and product category.
[Fixed row]

(5.11.6) Provide details of the environmental requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☑ Adoption of the UN International Labour Organization Principles

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Supplier scorecard or rating

☑ Supplier self-assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☑ 100%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:

☑ 100%

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:

☑ 100%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ None

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

☑ Providing information on appropriate actions that can be taken to address non-compliance

(5.11.6.12) Comment

TUBACEX has a specific management process for its supply chain, which is currently under review in order to incorporate the expectations of interest groups in terms of sustainability performance and to increase the TUBACEX Group's leverage on its supply chain in terms of sustainability. In this way, suppliers with the highest turnover or the criticality level in terms of social, environmental or governance performance will be evaluated and audited using criteria adapted to their sector and type of company to identify their performance in this area, along with their level of risk. This process will be complemented by a closed loop of improvement proposals and feedback to suppliers, which will increase the group's pulling effect on its supply chain in terms of sustainability. This process will be integrated into existing supplier management tools, such as the supplier portal, which has provided greater insight into the sustainability status of supplier companies since 2019, prioritizing those with the best performance. In 2023, supplier companies representing 85.5% of the purchasing volume signed the TUBACEX Supplier Code of Conduct, making it their own and committing themselves to its compliance. No breach of the TUBACEX Code of Conduct has been reported until now.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☑ Compliance with an environmental certification, please specify **:** ISO 14001

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Supplier self-assessment

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☑ 1-25%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☑ 76-99%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:

☑ 76-99%

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:

☑ 51-75%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☑ Retain and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:

☑ 1-25%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Assessing the efficacy and efforts of non-compliant supplier actions through consistent and quantified metrics

☑ Providing information on appropriate actions that can be taken to address non-compliance

(5.11.6.12) Comment

TUBACEX has a specific management process for its supply chain, which is currently under review in order to incorporate the expectations of interest groups in terms of sustainability performance and to increase the TUBACEX Group's leverage on its supply chain in terms of sustainability. In this way, suppliers with the highest turnover or the criticality level in terms of social, environmental or governance performance will be evaluated and audited using criteria adapted to their sector and type of company to identify their performance in this area, along with their level of risk. This process will be complemented by a closed loop of improvement proposals and feedback to suppliers, which will increase the group's pulling effect on its supply chain in terms of sustainability. This process will be integrated into existing supplier management tools, such as the supplier portal, which has provided greater insight into the sustainability status of supplier companies since 2019, prioritizing those with the best performance. In 2023, supplier companies representing 85.5% of the purchasing volume signed the TUBACEX Supplier Code of Conduct, making it their own and committing themselves to its compliance. No breach of the TUBACEX Code of Conduct has been reported until now.

Climate change

(5.11.6.1) Environmental requirement

Select from:

☑ Monitoring and reduction of Product Carbon Footprint (PCF)/ product life-cycle emissions

(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☑ Second-party verification

(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:
☑ 1-25%

(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:
☑ 1-25%

(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement

Select from:
☑ 76-99%

(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement

Select from:
☑ 26-50%

(5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:
☑ Suspend and engage

(5.11.6.10) % of non-compliant suppliers engaged

Select from:
☑ 51-75%

(5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☑ Developing quantifiable, time-bound targets and milestones to bring suppliers back into compliance

(5.11.6.12) Comment

TUBACEX has a specific management process for its supply chain, which is currently under review in order to incorporate the expectations of interest groups in terms of sustainability performance and to increase the TUBACEX Group's leverage on its supply chain in terms of sustainability. In this way, suppliers with the highest turnover or the criticality level in terms of social, environmental or governance performance will be evaluated and audited using criteria adapted to their sector and type of company to identify their performance in this area, along with their level of risk. This process will be complemented by a closed loop of improvement proposals and feedback to suppliers, which will increase the group's pulling effect on its supply chain in terms of sustainability. This process will be integrated into existing supplier management tools, such as the supplier portal, which has provided greater insight into the sustainability status of supplier companies since 2019, prioritizing those with the best performance. In 2023, supplier companies representing 85.5% of the purchasing volume signed the TUBACEX Supplier Code of Conduct, making it their own and committing themselves to its compliance. No breach of the TUBACEX Code of Conduct has been reported until now.
[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ No other supplier engagement
[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information about your products and relevant certification schemes

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders in creation and review of your climate transition plan

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ 100%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

TUBACEX is actively sharing climate related information with customers in order to help them monitor and calculate their climate impact. TUBACEX is aware of the importance of monitoring our climate impact and is keen on helping our customers on the way of calculating their climate impact. Climate related information is shared publicly and is available for all customers independent on the purchasing volume or sector. TUBACEX does not make a discrimination in terms of climate related information sharing. All information is shared publicly and available for all customers. Also, TUBACEX is at our customers disposal in order to facilitate any additional climate related information they require. Besides this, the company aims at providing advanced industrial products and services. We want to do so by contributing to the development of innovative solutions for the energy transition offering our technological capability to our customers and to business diversification. We facilitate the industrialization of innovative technological solutions, moving towards business diversification. We scale high impact green technologies for sustainable growth from the design to its subsequent implementation in industrial processes; maintaining a proactive vision in emerging technologies that reduce the environmental footprint and foster the diversification of our business. We collaborate with our customers on the development of innovative solutions that facilitate their transition. We work with our customers on the co-development of tubular solutions, making improvement proposals to the design that lead to better environmental performance.

(5.11.9.6) Effect of engagement and measures of success

Transparency through making our climate related information public and helping our customers in the task of calculating their climate impact helps us develop close strategic long-term relations with our customers. Clients seek solutions that result in a reduction of their carbon footprint, being able to access all the necessary information to make it possible. Sometimes, this means joint co-development of advance solutions and value proposals, promoting our philosophy of open innovation. An example of this is the development of different solutions that solve specific problems in the industry in terms of energy efficiency, both in conventional energy sectors, and in proposals with high added value for new activity segments linked to new energies.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Other value chain stakeholder, please specify :Associations

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks

☑ Share information about your products and relevant certification schemes

☑ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☑ Collaborate with stakeholders in creation and review of your climate transition plan

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ 100%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

TUBACEX's sustainability strategy implies transparency regarding sharing climate related information. Apart from customers and suppliers, TUBACEX is open to share any climate related information with other stake holders in the value chain. In the past years TUBACEX has identify and increasing request regarding climate related information from our banks and project financing entities. In all cases, TUBACEX has adapt and shared the requested information to help building confidence strengthen the relationship between parties. TUBACEX participates in leading initiatives that lead the energy transition. We believe in the importance of developing collaborative models to pool knowledge and technological synergies. For this reason, we are involved in associations and clusters for the energy transition, exploring new business models. We also explore new business and technology models along with start-ups.

(5.11.9.6) Effect of engagement and measures of success

As an example of this TUBACEX is leading the HY2DEC project. The objective of the project is to advance towards sustainable production and use of green hydrogen and oxygen, as well as CO2 capture, to achieve a positive emissions balance. The project, which is part of CDTI's Misiones program, focuses on intensive industrial sectors such as steel and ceramics. The research areas include electrochemical hydrogen production, heat generation using green hydrogen as fuel, and CO2 capture technologies. Each participating company has specific research objectives related to their expertise. The project, with a total budget of 5,872,941 EUR, is scheduled to be completed in 2025, and the scalability and industrialization of prototypes developed by the participants will be explored. We are also participating in digital projects that, through the use of artificial intelligence, optimizes a key production process, contributing to lower energy consumption and a reduction in CO2 emissions, aligned with our company's strategic sustainability purpose. Some of the associations we are currently participating in: · H2IT- Italian Association of Hydrogen and Fuel Cells · Basque Hydrogen Corridor · SHYNE (Spanish Hydrogen Network): · Net-Zero MAR Alliance · H2Basque.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☑ Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

☑ Share information on environmental initiatives, progress and achievements

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 100%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ None

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Tubacex regularly shares information on its decarbonization plan and emissions reduction pathway. This information is highlighted in its quarterly earnings reports. In addition, the company is actively linking its financing to climate sustainability objectives, thus maintaining a very active approach with banks.

(5.11.9.6) Effect of engagement and measures of success

The impact of this type of engagement is reflected in the positive valuation of the company and transparency. In the case of banks, it is materializing with the signing of several financing operations linked to sustainability objectives, more specifically related to the scope 1, 2 and 3 emissions.
[Add row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

We consolidate environmental information from all plants on a monthly basis, incorporating information on energy consumption, water, raw materials, waste, etc. This is done through a computerized tool that allows us to monitor indicators on a plant-by-plant, month-by-month basis. Our consolidation approach in totally aligned with financial consolidation.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

We consolidate environmental information from all plants on a monthly basis, incorporating information on energy consumption, water, raw materials, waste, etc. This is done through a computerized tool that allows us to monitor indicators on a plant-by-plant, month-by-month basis. Our consolidation approach in totally aligned with financial consolidation.
[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:

☑ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	Select all that apply ☑ No

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply

☑ Yes, a change in methodology

☑ No, but we have discovered significant errors in our previous response(s)

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

Changes in Methodology: We have expanded the scope 3 categories reported to include categories 10, 12 and corrected category 4 calculation methods. Category 9 emissions have been reassigned, without changes, to category 4 Error correction: The Scope 2 local-based emissions data for the years 2019, 2020, 2021, and 2022 have been reformulated due to corrections in the calculation
[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:
☑ Yes

(7.1.3.2) Scope(s) recalculated

Select all that apply
☑ Scope 2, location-based
☑ Scope 3

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

Changes in Methodology: We have expanded the scope 3 categories reported to include categories 10, 12 and corrected category 4 calculation methods. Category 9 emissions have been reassigned, without changes, to category 4 As threshold to recalculate emissions we used a variance of more than 0.1% of total scope emissions Error correction: The Scope 2 local-based emissions data for the years 2019, 2020, 2021, and 2022 have been reformulated due to corrections in the calculation

(7.1.3.4) Past years' recalculation

Select from:
☑ Yes
[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:

☑ We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

☑ We are reporting a Scope 2, market-based figure

(7.3.3) Comment

Because the information available for some countries is limited, the market-based figure is a mixed figure, as we used both location-based emission factors and market- based emission factors. We used a market-based approach for Spain, Austria, USA, Norway, Italy
[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

☑ Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

Row 1

(7.4.1.1) Source of excluded emissions

All sites

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 3: Employee commuting

(7.4.1.6) Relevance of Scope 3 emissions from this source

Select from:

☑ Emissions are relevant but not yet calculated

(7.4.1.9) Estimated percentage of total Scope 3 emissions this excluded source represents

0.1

(7.4.1.10) Explain why this source is excluded

The emissions percentage from this source is very low and we are actively working on improvements, and this source will be included in the next years.

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

We estimate the emissions by calculating the number of employees, applying a typical distribution across transportation modes, and using average distances while being conservative with the distances

Row 3

(7.4.1.1) Source of excluded emissions

COMMERCIAL OFFICES

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 1

☑ Scope 2 (location-based)

☑ Scope 2 (market-based)

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☑ Emissions are not relevant

(7.4.1.4) Relevance of location-based Scope 2 emissions from this source

Select from:

☑ Emissions are not relevant

(7.4.1.5) Relevance of market-based Scope 2 emissions from this source

Select from:

☑ Emissions are not relevant

(7.4.1.8) Estimated percentage of total Scope 1+2 emissions this excluded source represents

0.1

(7.4.1.10) Explain why this source is excluded

Based on the commercial office activity, it is assumed that overall consumption is lower than that of plants where there is active production

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

The estimation was based on the nature of the commercial office activity, which has significantly lower energy demands compared to production facilities. We used the consumption data from similar sites, ensuring that, at most, it would be equivalent to a small percentage of the overall group's emissions
[Add row]

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

67340.08

(7.5.3) Methodological details

Measurement based on actual energy consumption for stationary and mobile combustion with IPCC 2006 Guidelines. Chapter 2. Table 2.3. For process emissions actual material consumption and ecoinvent 3.8 factor

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

56292.23

(7.5.3) Methodological details

Actual consumption and local factor from carbonfootprint.com

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

72780.76

(7.5.3) Methodological details

Actual consumption and supplier provided factors

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

268877.18

(7.5.3) Methodological details

Hybrid approach, actual consumption (weight or volume) with standard factors (ecoinvent 3.8, sector specific)

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

45696.42

(7.5.3) Methodological details

Spend based approach

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

34415.22

(7.5.3) Methodological details

We multiply the quantities used for the calculation of Scope 1 and 2 emissions for the different types of fuels by appropriate upstream emission factors, depending on the type of energy and the country.

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

1228

(7.5.3) Methodological details

We have recorded the transport data with volumes and estimated distances, multiplied by specific emission factors for each mode of transport.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

92

(7.5.3) Methodological details

Tons of waste generated mutiplied by emission factors ecoinvent

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/31/2019

(7.5.2) Base year emissions (metric tons CO2e)

3149.73

(7.5.3) Methodological details

Spend based approach

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not evaluated. Estimated less 0.1% of total

Scope 3 category 8: Upstream leased assets

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not applicable to Tubacex operations

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

10130.51

(7.5.3) Methodological details

We have recorded the transport data with volumes and distances, multiplied by specific emission factors for each mode of transport.

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

3661.02

(7.5.3) Methodological details

we have used the emission factors of our more significant factories as a reference.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not applicable to Tubacex operations

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

4531.34

(7.5.3) Methodological details

we have modeled key markets where our products are sold and return supply chains to reuse products as scrap for our steel mill

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not applicable to Tubacex operations

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not applicable to Tubacex operations

Scope 3 category 15: Investments

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not applicable to Tubacex operations

Scope 3: Other (upstream)

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not applicable to Tubacex operations

Scope 3: Other (downstream)

(7.5.1) Base year end

12/30/2019

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

Not applicable to Tubacex operations
[Fixed row]

(7.6) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

48540.66

(7.6.3) Methodological details

Calculation based on actual fuel consumptions by site considering emission factor for each fuel provided by the spanish ministry of industry. It also includes process direct emissions related which are calculated based on actual consumption and corresponding emission factors based on material composition. GHG gases converted into CO2e using GWP values

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

54811.35

(7.6.2) End date

12/30/2022

(7.6.3) Methodological details

Calculation based on actual fuel consumptions by site considering emission factor for each fuel provided by the spanish ministry of industry. It also includes process direct emissions related which are calculated based on actual consumption and corresponding emission factors based on material composition. GHG gases converted into CO2e using GWP values

Past year 2

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

28083.77

(7.6.2) End date

12/30/2021

(7.6.3) Methodological details

Calculation based on actual fuel consumptions by site considering emission factor for each fuel provided by the spanish ministry of industry. It also includes process direct emissions related which are calculated based on actual consumption and corresponding emission factors based on material composition. GHG gases converted into CO2e using GWP values

Past year 3

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

43123.13

(7.6.2) End date

12/30/2020

(7.6.3) Methodological details

Calculation based on actual fuel consumptions by site considering emission factor for each fuel provided by the spanish ministry of industry. It also includes process direct emissions related which are calculated based on actual consumption and corresponding emission factors based on material composition. GHG gases converted into CO2e using GWP values

Past year 4

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

67340.08

(7.6.2) End date

12/30/2019

(7.6.3) Methodological details

Calculation based on actual fuel consumptions by site considering emission factor for each fuel provided by the spanish ministry of industry. It also includes process direct emissions related which are calculated based on actual consumption and corresponding emission factors based on material composition. GHG gases converted into CO2e using GWP values
[Fixed row]

(7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

35162.74

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

14704.43

(7.7.4) Methodological details

Actual consumption in each site, with local emission factor for corresponding market/country and market emission factor base on energy commercialization company reported factor, or specific contract, or physical ppa for sites covered

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

41448.29

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

16361.12

(7.7.3) End date

12/30/2022

(7.7.4) Methodological details

Actual consumption in each site, with local emission factor for corresponding market/country and market emission factor base on energy commercialization company reported factor, or specific contract, or physical ppa for sites covered

Past year 2

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

24255.01

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

18107.97

(7.7.3) End date

12/30/2021

(7.7.4) Methodological details

Actual consumption in each site, with local emission factor for corresponding market/country and market emission factor base on energy commercialization company reported factor, or specific contract, or physical ppa for sites covered

Past year 3

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

37382.19

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

21398.94

(7.7.3) End date

12/30/2020

(7.7.4) Methodological details

Actual consumption in each site, with local emission factor for corresponding market/country and market emission factor base on energy commercialization company reported factor, or specific contract, or physical ppa for sites covered

Past year 4

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

56262.23

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e) (if applicable)

72789.76

(7.7.3) End date

12/30/2019

(7.7.4) Methodological details

Actual consumption in each site, with local emission factor for corresponding market/country and market emission factor base on energy commercialization company reported factor, or specific contract, or physical ppa for sites covered
[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

275973.34

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Hybrid method

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

60

(7.8.5) Please explain

Activity data from our ERP systems with actual consumptions (weight, volumen, spend) multiplied by emission factors from suppliers or reference databases like ecoinvent

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

99238.79

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Spend-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Spend multiplied by public available factor (DEFRA)

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

26773.66

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Hybrid method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Activity/consumption of fuel multiplied by public upstream factor (DEFRA or local ones where available)

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

5451.56

(7.8.3) Emissions calculation methodology

Select all that apply
☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Activity, weight and distance, multiplied by emission factor for each transportation model (DEFRA)

Waste generated in operations

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

94.58

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Hybrid method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Activity multiplied by specific factors (ecoinvent)

Business travel

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

329.17

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Hybrid method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Data provided by travel supplier

Employee commuting

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

Rough estimation of less that 0.1% of emissions. Planned to include it in the next 2 years

Upstream leased assets

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

Not applicable

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

Not applicable. Sold ex-works

Processing of sold products

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

3208.14

(7.8.3) Emissions calculation methodology

Select all that apply
☑ Hybrid method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Actual sales of semifinished goods (bars) muliplied by emission factor using as reference our two most significant sites as a proxy to calculate factor of third parties.

Use of sold products

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

Not applicable to our products. No emission generated

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:
☑ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

3400.95

(7.8.3) Emissions calculation methodology

Select all that apply
☑ Hybrid method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Estimation model, calculating emissions from scrap recovery and transport from originating country to consumption point in our value chain

Downstream leased assets

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

Not applicable

Franchises

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

Not applicable

Investments

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

Not applicable

Other (upstream)

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

Not applicable

Other (downstream)

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Not applicable
[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/30/2022

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

246395.35

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

8181

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

29208.36

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

9172.03

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

108

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

258.61

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

0

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

0

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

3208.14

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

3400.95

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

None

Past year 2

(7.8.1.1) End date

12/30/2021

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

144282.52

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

23324.81

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

15844.26

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

4719.26

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

33

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

54.91

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

0

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

1574.81

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

571.95

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

1424.6

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

Long strike affecting key facilitie

Past year 3

(7.8.1.1) End date

12/30/2020

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

142122.41

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

23559.33

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

26139.46

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

809.22

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

55

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

84.8

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

0

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

6682.82

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

3573.67

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

2960.92

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

Impact of pandemic

Past year 4

(7.8.1.1) End date

12/30/2019

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

268877.18

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

45696.42

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

34415.22

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

1228

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

92

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

3149.73

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

0

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

0

(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)

10130

(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)

3661.02

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

0

(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

4531.34

(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

0

(7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

(7.8.1.16) Scope 3: Investments (metric tons CO2e)

0

(7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

(7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

(7.8.1.19) Comment

Base Year SBTi
[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	*Select from:* ☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	*Select from:* ☑ Third-party verification or assurance process in place
Scope 3	*Select from:* ☑ Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:

☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.1.4) Attach the statement

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(7.9.1.5) Page/section reference

page 176

(7.9.1.6) Relevant standard

Select from:
☑ ISAE3000

(7.9.1.7) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:
☑ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.2.5) Attach the statement

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(7.9.2.6) Page/ section reference

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(7.9.2.7) Relevant standard

Select from:

☑ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:

☑ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.2.5) Attach the statement

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(7.9.2.6) Page/ section reference

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(7.9.2.7) Relevant standard

Select from:

☑ ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

- ☑ Scope 3: Capital goods
- ☑ Scope 3: Business travel
- ☑ Scope 3: Processing of sold products
- ☑ Scope 3: Purchased goods and services
- ☑ Scope 3: Waste generated in operations
- ☑ Scope 3: End-of-life treatment of sold products
- ☑ Scope 3: Upstream transportation and distribution
- ☑ Scope 3: Downstream transportation and distribution
- ☑ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.3.3) Status in the current reporting year

Select from:

☑ Complete

(7.9.3.4) Type of verification or assurance

Select from:

☑ Limited assurance

(7.9.3.5) Attach the statement

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(7.9.3.6) Page/section reference

(7.9.3.7) Relevant standard

Select from:
☑ ISAE3000

(7.9.3.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:
☑ Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO2e)

1333.3

(7.10.1.2) Direction of change in emissions

Select from:
☑ Decreased

(7.10.1.3) Emissions value (percentage)

1.87

(7.10.1.4) Please explain calculation

Change to supplier with renewable electricity in some geographies

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

4193.73

(7.10.1.2) Direction of change in emissions

Select from:

☑ Decreased

(7.10.1.3) Emissions value (percentage)

5.89

(7.10.1.4) Please explain calculation

Energy efficiency measures implemented

Divestment

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

None

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

None

Mergers

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

None

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

2400.34

(7.10.1.2) Direction of change in emissions

Select from:
☑ Decreased

(7.10.1.3) Emissions value (percentage)

3.37

(7.10.1.4) Please explain calculation

Reduced output

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

None

Change in boundary

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:

☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

None

Change in physical operating conditions

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

None

Unidentified

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

None

Other

(7.10.1.1) Change in emissions (metric tons CO2e)

0

(7.10.1.2) Direction of change in emissions

Select from:
☑ No change

(7.10.1.3) Emissions value (percentage)

0

(7.10.1.4) Please explain calculation

NO CHANGE
[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:
☑ Market-based

(7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:
☑ No

(7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:
☑ Yes

(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:
☑ CO2

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

48518.49

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:
☑ N2O

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

21.9

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:
☑ CH4

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

0.27

(7.15.1.3) GWP Reference

Select from:
☑ IPCC Sixth Assessment Report (AR6 - 100 year)
[Add row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

Austria

(7.16.1) Scope 1 emissions (metric tons CO2e)

3341.17

(7.16.2) Scope 2, location-based (metric tons CO2e)

2409.1

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Brazil

(7.16.1) Scope 1 emissions (metric tons CO2e)

15.5

(7.16.2) Scope 2, location-based (metric tons CO2e)

2.64

(7.16.3) Scope 2, market-based (metric tons CO2e)

3.72

Canada

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

74.18

(7.16.3) Scope 2, market-based (metric tons CO2e)

282.44

France

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

11.66

(7.16.3) Scope 2, market-based (metric tons CO2e)

5.07

Guyana

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

15

(7.16.3) Scope 2, market-based (metric tons CO2e)

15

India

(7.16.1) Scope 1 emissions (metric tons CO2e)

3822.98

(7.16.2) Scope 2, location-based (metric tons CO2e)

6947.01

(7.16.3) Scope 2, market-based (metric tons CO2e)

8198.82

Italy

(7.16.1) Scope 1 emissions (metric tons CO2e)

1346.29

(7.16.2) Scope 2, location-based (metric tons CO2e)

1140.57

(7.16.3) Scope 2, market-based (metric tons CO2e)

1174.9

Kazakhstan

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

30

(7.16.3) Scope 2, market-based (metric tons CO2e)

30

Norway

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

62.17

(7.16.3) Scope 2, market-based (metric tons CO2e)

10.7

Saudi Arabia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

1610.34

(7.16.3) Scope 2, market-based (metric tons CO2e)

1425.12

Singapore

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

103.66

(7.16.3) Scope 2, market-based (metric tons CO2e)

117.72

Spain

(7.16.1) Scope 1 emissions (metric tons CO2e)

38040.75

(7.16.2) Scope 2, location-based (metric tons CO2e)

17730.47

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Thailand

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

306.06

(7.16.3) Scope 2, market-based (metric tons CO2e)

361.72

United Arab Emirates

(7.16.1) Scope 1 emissions (metric tons CO2e)

38.69

(7.16.2) Scope 2, location-based (metric tons CO2e)

1104.17

(7.16.3) Scope 2, market-based (metric tons CO2e)

1019.86

United States of America

(7.16.1) Scope 1 emissions (metric tons CO2e)

1950.78

(7.16.2) Scope 2, location-based (metric tons CO2e)

3605.71

(7.16.3) Scope 2, market-based (metric tons CO2e)

2058.36
[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply
☑ By business division
☑ By facility
☑ By activity

(7.17.1) Break down your total gross global Scope 1 emissions by business division.

	Business division	Scope 1 emissions (metric ton CO2e)
Row 1	*America*	*1923.49*
Row 2	*Asia*	*3822.98*
Row 3	*BU Extrusion*	*12125.01*

	Business division	Scope 1 emissions (metric ton CO2e)
Row 4	*BU Steel*	*29063.25*
Row 5	*SPECIAL COMPONENTS*	*1501.17*
Row 6	*Trading & Services*	*104.77*

[Add row]

(7.17.2) Break down your total gross global Scope 1 emissions by business facility.

Row 1

(7.17.2.1) Facility

ACERÍA DE ÁLAVA, S.A.U.

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

29063.25

(7.17.2.3) Latitude

43.034558

(7.17.2.4) Longitude

-3

Row 2

(7.17.2.1) Facility

TUBACEX TUBOS INOXIDABLES, S.A.U. - AMURRIO

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

5815.57

(7.17.2.3) Latitude

43.037083

(7.17.2.4) Longitude

-3

Row 3

(7.17.2.1) Facility

TUBACEX DURANT, INC

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

88.68

(7.17.2.3) Latitude

33.97

(7.17.2.4) Longitude

-96.37

Row 4

(7.17.2.1) Facility

IBF-FITTINGS DIVISON

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

973.21

(7.17.2.3) Latitude

45.49

(7.17.2.4) Longitude

9.63

Row 5

(7.17.2.1) Facility

IBF-PIPES DIVISON

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

373.08

(7.17.2.3) Latitude

45.49

(7.17.2.4) Longitude

8.95

Row 6

(7.17.2.1) Facility

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

2968.27

(7.17.2.3) Latitude

43.14

(7.17.2.4) Longitude

-2.97

Row 7

(7.17.2.1) Facility

NTS-BROUSSARD

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

10.15

(7.17.2.3) Latitude

30.16

(7.17.2.4) Longitude

-91.98

Row 8

(7.17.2.1) Facility

NTS-ODESSA

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

12.62

(7.17.2.3) Latitude

31.87

(7.17.2.4) Longitude

-102.26

Row 9

(7.17.2.1) Facility

TUBACEX AMERICA INC.

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

14.67

(7.17.2.3) Latitude

29.85

(7.17.2.4) Longitude

-95.58

Row 10

(7.17.2.1) Facility

NTS MIDDLE EAST, FZCO

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

28.54

(7.17.2.3) Latitude

24.97

(7.17.2.4) Longitude

55.07

Row 11

(7.17.2.1) Facility

SALEM TUBE, INC

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1834.81

(7.17.2.3) Latitude

41.36

(7.17.2.4) Longitude

-80.41

Row 12

(7.17.2.1) Facility

SCHOELLER BLECKMANN EDELSTAHLROHR, GmbH

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

3341.17

(7.17.2.3) Latitude

47.71

(7.17.2.4) Longitude

16.04

Row 13

(7.17.2.1) Facility

TUBACEX SERVICES, S.L.

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

104.77

(7.17.2.3) Latitude

43.4

(7.17.2.4) Longitude

-3.74

Row 14

(7.17.2.1) Facility

TUBACEX TAYLOR ACCESORIOS, S.A.U.

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

88.9

(7.17.2.3) Latitude

43.12

(7.17.2.4) Longitude

-3.12

Row 15

(7.17.2.1) Facility

TUBACEX TUBES AND PIPES

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

3822.98

(7.17.2.3) Latitude

20.18

(7.17.2.4) Longitude

72.78
[Add row]

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Metal processing*	*19424.05*
Row 2	*Iron & Steel*	*29063.25*
Row 3	*Vehicles & machinery rental & leasing*	*53.36*

[Add row]

(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

	Gross Scope 1 emissions, metric tons CO2e	Comment
Steel production activities	*48540.66*	*scope 1 emissions*

[Fixed row]

(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

Select all that apply

☑ By business division

☑ By facility

☑ By activity

(7.20.1) Break down your total gross global Scope 2 emissions by business division.

	Business division	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	*America*	*3125.09*	*1580.73*
Row 2	*Asia*	*6800*	*8025.33*
Row 3	*BU Extrusion*	*9367.88*	*0*
Row 4	*BU Steel*	*10569.84*	*0*
Row 5	*Special Components*	*4838.88*	*4851.07*
Row 6	*Trading & Services*	*461.06*	*247.3*

[Add row]

(7.20.2) Break down your total gross global Scope 2 emissions by business facility.

Row 1

(7.20.2.1) Facility

ACERÍA DE ÁLAVA, S.A.U.

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

10569.84

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 2

(7.20.2.1) Facility

TUBACEX TUBOS INOXIDABLES, S.A.U. - AMURRIO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

2634.366

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 3

(7.20.2.1) Facility

TUBACEX DURANT, INC

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

1579.845

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

1580.73

Row 4

(7.20.2.1) Facility

IBF-FITTINGS DIVISION

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

558.339

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

575.14

Row 5

(7.20.2.1) Facility

IBF-PIPES DIVISION

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

582.232

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

599.76

Row 6

(7.20.2.1) Facility

TUBACEX TUBOS INOXIDABLES, S.A.U.- LLODIO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

4354.909

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 7

(7.20.2.1) Facility

NTS - BROUSSARD

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

175.517

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

150.07

Row 8

(7.20.2.1) Facility

NTS - ODESSA

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

86.635

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

83.4

Row 9

(7.20.2.1) Facility

NTS ROCKET CANADA, LTD.

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

74.181

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

282.44

Row 11

(7.20.2.1) Facility

NTS - HOUSTON

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

381.744

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

381.95

Row 12

(7.20.2.1) Facility

NTS AMEGA WEST SINGAPORE PTE LTD.

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

113.66

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

118.72

Row 13

(7.20.2.1) Facility

NTS MIDDLE EAST, FZCO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

818.109

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

818.11

Row 14

(7.20.2.1) Facility

PROMET, AS

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

6.232

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

9.64

Row 15

(7.20.2.1) Facility

NTS SAUDI, LLC

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

1610.344

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

1425.12

Row 16

(7.20.2.1) Facility

SALEM TUBE, INC

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

1545.246

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 17

(7.20.2.1) Facility

SCHOELLER BLECKMANN EDELSTAHLROHR, GmbH

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

2378.601

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 18

(7.20.2.1) Facility

TUBACEX SERVICES, S.L.

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

44.933

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 19

(7.20.2.1) Facility

TUBACEX AWAJI THAILAND, Ltd.

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

306.064

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

361.72

Row 20

(7.20.2.1) Facility

TUBACEX SERVICE SOLUTIONS S.A.U. - AMBROSERO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

102.763

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

43.49

Row 21

(7.20.2.1) Facility

TSS NORWAY, AS

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

55.936

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

1.06

Row 22

(7.20.2.1) Facility

TUBACEX SERVICE SOLUTIONS AUSTRIA, GmbH

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

30.497

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 23

(7.20.2.1) Facility

TSS DO BRASIL COM. E DISTRIB. DE TUBOS E AÇOS ESPEC., LTDA

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

2.641

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

3.72

Row 24

(7.20.2.1) Facility

TUBACEX SERVICE SOLUTIONS FRANCE, S.A.S.

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

11.655

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

5.07

Row 25

(7.20.2.1) Facility

TUBACEX AMERICA INC.

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

12.238

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

12.28

Row 26

(7.20.2.1) Facility

TUBACEX SERVICE SOLUTIONS INDIA, Pvt. Ltd.

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

147.017

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

173.49

Row 27

(7.20.2.1) Facility

TUBACEX SERVICE SOLUTIONS MIDDLE EAST, FZCO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

7.783

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

8.19

Row 28

(7.20.2.1) Facility

TUBACEX SERVICE SOLUTIONS S.A.U.

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

45.596

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 29

(7.20.2.1) Facility

TUBACEX TAYLOR ACCESORIOS, S.A.U.

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

80.824

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 31

(7.20.2.1) Facility

TUBACEX TUBES AND PIPES

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

6799.996

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

8025.33

Row 32

(7.20.2.1) Facility

TUBACEX IBF KAZAKHSTAN

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

30

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

30

Row 33

(7.20.2.1) Facility

NTS AMEGA ATLANTIC, INC

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

15

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

15
[Add row]

(7.20.3) Break down your total gross global Scope 2 emissions by business activity.

	Activity	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	*Iron & Steel*	*10569.84*	*0*
Row 2	*Metal Processing*	*20951.99*	*11226.08*
Row 3	*Metals supply, wholeshale & trading*	*416.13*	*247.3*
Row 4	*Vehicles & machinery rental & leasing*	*3224.79*	*3231.05*

[Add row]

(7.21) Break down your organization’s total gross global Scope 2 emissions by sector production activity in metric tons CO2e.

	Scope 2, location-based, metric tons CO2e	Scope 2, market-based (if applicable), metric tons CO2e
Steel production activities	*35162.74*	*14704.43*

[Fixed row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Consolidated accounting group

(7.22.1) Scope 1 emissions (metric tons CO2e)

48540.66

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

35162.74

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

14704.43

(7.22.4) Please explain

All emissions from all plants are reported at a consolidated level

All other entities

(7.22.1) Scope 1 emissions (metric tons CO2e)

0

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

0

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

0

(7.22.4) Please explain

All emissions from all plants are reported at a consolidated level
[Fixed row]

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:
☑ Yes

(7.23.1) Break down your gross Scope 1 and Scope 2 emissions by subsidiary.

Row 1

(7.23.1.1) Subsidiary name

ACERÍA DE ÁLAVA, S.A.U.

(7.23.1.2) Primary activity

Select from:

☑ Iron & steel

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

29063.246

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

10569.84

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year.

Row 2

(7.23.1.1) Subsidiary name

IBF, S.p.A.

(7.23.1.2) Primary activity

Select from:

☑ Metal processing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

1346.289

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

1185.571

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1219.9

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 3

(7.23.1.1) Subsidiary name

NTS AMEGA WEST SINGAPORE PTE LTD.

(7.23.1.2) Primary activity

Select from:

☑ Vehicles & machinery rental & leasing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

113.66

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

118.72

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 4

(7.23.1.1) Subsidiary name

NTS AMEGA WEST USA, INC

(7.23.1.2) Primary activity

Select from:

☑ Vehicles & machinery rental & leasing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

37.438

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

643.896

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

615.42

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 5

(7.23.1.1) Subsidiary name

NTS MIDDLE EAST, FZCO

(7.23.1.2) Primary activity

Select from:

☑ Vehicles & machinery rental & leasing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

28.544

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

825.891

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

826.3

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 6

(7.23.1.1) Subsidiary name

NTS ROCKET CANADA, LTD.

(7.23.1.2) Primary activity

Select from:

☑ Vehicles & machinery rental & leasing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

74.181

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

282.44

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 7

(7.23.1.1) Subsidiary name

NTS SAUDI, LLC

(7.23.1.2) Primary activity

Select from:

☑ Vehicles & machinery rental & leasing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

1610.34

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1425.12

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 8

(7.23.1.1) Subsidiary name

PROMET, AS

(7.23.1.2) Primary activity

Select from:

☑ Vehicles & machinery rental & leasing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

6.232

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

9.64

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 9

(7.23.1.1) Subsidiary name

SALEM TUBE, IN

(7.23.1.2) Primary activity

Select from:

☑ Metal processing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

1834.805

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

1545.246

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 10

(7.23.1.1) Subsidiary name

SCHOELLER BLECKMANN EDELSTAHLROHR, GmbH

(7.23.1.2) Primary activity

Select from:

☑ Metal processing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

3341.174

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

2378.601

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 11

(7.23.1.1) Subsidiary name

TSS DO BRASIL COM. E DISTRIB. DE TUBOS E AÇOS ESPEC., LTDA

(7.23.1.2) Primary activity

Select from:

☑ Metals supply, wholesale & trading

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

2.641

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

3.72

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 12

(7.23.1.1) Subsidiary name

TSS NORWAY, AS

(7.23.1.2) Primary activity

Select from:

☑ Metals supply, wholesale & trading

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

55.936

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1.06

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 13

(7.23.1.1) Subsidiary name

TUBACEX AMERICA INC.

(7.23.1.2) Primary activity

Select from:

☑ Metals supply, wholesale & trading

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

12.238

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

12.28

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 14

(7.23.1.1) Subsidiary name

TUBACEX AWAJI THAILAND, Ltd.

(7.23.1.2) Primary activity

Select from:

☑ Metal processing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

306.064

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

361.72

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 15

(7.23.1.1) Subsidiary name

TUBACEX DURANT, INC

(7.23.1.2) Primary activity

Select from:

☑ Metal processing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

88.681

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

1579.845

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1580.73

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 16

(7.23.1.1) Subsidiary name

TUBACEX LOGISTICS, S.A.

(7.23.1.2) Primary activity

Select from:

☑ Logistics - transport

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

0

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 17

(7.23.1.1) Subsidiary name

TUBACEX SERVICE SOLUTIONS AUSTRIA, Gmb

(7.23.1.2) Primary activity

Select from:

☑ Metals supply, wholesale & trading

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

30.497

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 18

(7.23.1.1) Subsidiary name

TUBACEX SERVICE SOLUTIONS FRANCE, S.A.S.

(7.23.1.2) Primary activity

Select from:

☑ Metals supply, wholesale & trading

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

11.655

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

5.07

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 19

(7.23.1.1) Subsidiary name

TUBACEX SERVICE SOLUTIONS INDIA, Pvt. Ltd.

(7.23.1.2) Primary activity

Select from:

☑ Metals supply, wholesale & trading

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

147.017

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

173.49

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 20

(7.23.1.1) Subsidiary name

TUBACEX SERVICE SOLUTIONS S.A.U.

(7.23.1.2) Primary activity

Select from:

☑ Metals supply, wholesale & trading

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

148.359

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

43.49

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 21

(7.23.1.1) Subsidiary name

TUBACEX SERVICES, S.L.

(7.23.1.2) Primary activity

Select from:

☑ Metal processing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

104.771

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

44.933

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 22

(7.23.1.1) Subsidiary name

TUBACEX TAYLOR ACCESORIOS, S.A.U.

(7.23.1.2) Primary activity

Select from:

☑ Metal processing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

88.899

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

80.824

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 23

(7.23.1.1) Subsidiary name

TUBACEX TUBES AND PIPES PVT LTD

(7.23.1.2) Primary activity

Select from:

☑ Metal processing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

3822.976

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

6799.996

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

8025.33

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year

Row 24

(7.23.1.1) Subsidiary name

TUBACEX TUBOS INOXIDABLES, S.A.U.

(7.23.1.2) Primary activity

Select from:

☑ Metal processing

(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary

Select all that apply

☑ No unique identifier

(7.23.1.12) Scope 1 emissions (metric tons CO2e)

8783.836

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

6989.275

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0

(7.23.1.15) Comment

We have maintained our traditional classification under the "Iron and Steel" model. However, in these columns, we have incorporated the classification for each subsidiary according to its primary activity. This classification will be considered starting next year
[Add row]

(7.26) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.

Row 1

(7.26.1) Requesting member

Select from:

(7.26.2) Scope of emissions

Select from:

☑ Scope 1

(7.26.4) Allocation level

Select from:

☑ Company wide

(7.26.6) Allocation method

Select from:

☑ Allocation based on mass of products purchased

(7.26.7) Unit for market value or quantity of goods/services supplied

Select from:

☑ Currency

(7.26.8) Market value or quantity of goods/services supplied to the requesting member

10658242.4

(7.26.9) Emissions in metric tonnes of CO2e

656.23

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

fossil fuel combution, mainly natural gas

(7.26.12) Allocation verified by a third party?

Select from:

☑ No

(7.26.13) Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

We applied a company wide approach, assigning emissions in each scope category to the client based on mass of products

Row 2

(7.26.1) Requesting member

Select from:

(7.26.2) Scope of emissions

Select from:

☑ Scope 2: market-based

(7.26.4) Allocation level

Select from:

☑ Company wide

(7.26.6) Allocation method

Select from:

☑ Allocation based on mass of products purchased

(7.26.7) Unit for market value or quantity of goods/services supplied

Select from:

☑ Currency

(7.26.8) Market value or quantity of goods/services supplied to the requesting member

10658242.4

(7.26.9) Emissions in metric tonnes of CO2e

198.79

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

emissions from non-renawable electricity

(7.26.12) Allocation verified by a third party?

Select from:

☑ No

(7.26.13) Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

We applied a company wide approach, assigning emissions in each scope category to the client based on mass of products

Row 3

(7.26.1) Requesting member

Select from:

(7.26.2) Scope of emissions

Select from:

☑ Scope 3

(7.26.3) Scope 3 category(ies)

Select all that apply

☑ Category 2: Capital goods

☑ Category 6: Business travel

☑ Category 1: Purchased goods and services

☑ Category 10: Processing of sold products

☑ Category 5: Waste generated in operations

☑ Category 12: End-of-life treatment of sold products

☑ Category 4: Upstream transportation and distribution

☑ Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.26.4) Allocation level

Select from:

☑ Company wide

(7.26.6) Allocation method

Select from:

☑ Allocation based on mass of products purchased

(7.26.7) Unit for market value or quantity of goods/services supplied

Select from:

☑ Currency

(7.26.8) Market value or quantity of goods/services supplied to the requesting member

10658242.4

(7.26.9) Emissions in metric tonnes of CO2e

5603.26

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

Ferroalloys and metals used in steel production. Although a high level of scrap is used there are still significant amounts of raw materials

(7.26.12) Allocation verified by a third party?

Select from:
☑ No

(7.26.13) Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

We applied a company wide approach, assigning emissions in each scope category to the client based on mass of products

Row 5

(7.26.1) Requesting member

Select from:

(7.26.2) Scope of emissions

Select from:
☑ Scope 1

(7.26.4) Allocation level

Select from:
☑ Company wide

(7.26.6) Allocation method

Select from:

☑ Allocation based on mass of products purchased

(7.26.7) Unit for market value or quantity of goods/services supplied

Select from:

☑ Currency

(7.26.8) Market value or quantity of goods/services supplied to the requesting member

14793775.5

(7.26.9) Emissions in metric tonnes of CO2e

910.86

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

fossil fuel combution, mainly natural gas

(7.26.12) Allocation verified by a third party?

Select from:

☑ No

(7.26.13) Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

We applied a company wide approach, assigning emissions in each scope category to the client based on mass of products

Row 7

(7.26.1) Requesting member

Select from:

(7.26.2) Scope of emissions

Select from:
☑ Scope 2: market-based

(7.26.4) Allocation level

Select from:
☑ Company wide

(7.26.6) Allocation method

Select from:
☑ Allocation based on mass of products purchased

(7.26.7) Unit for market value or quantity of goods/services supplied

Select from:
☑ Currency

(7.26.8) Market value or quantity of goods/services supplied to the requesting member

14793775.5

(7.26.9) Emissions in metric tonnes of CO2e

275.93

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

emissions from non-renawable electricity

(7.26.12) Allocation verified by a third party?

Select from:

☑ No

(7.26.13) Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

We applied a company wide approach, assigning emissions in each scope category to the client based on mass of products

Row 8

(7.26.1) Requesting member

Select from:

(7.26.2) Scope of emissions

Select from:

☑ Scope 3

(7.26.3) Scope 3 category(ies)

Select all that apply

☑ Category 2: Capital goods

☑ Category 6: Business travel

☑ Category 1: Purchased goods and services

☑ Category 10: Processing of sold products

☑ Category 12: End-of-life treatment of sold products

☑ Category 4: Upstream transportation and distribution

☑ Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

☑ Category 5: Waste generated in operations

(7.26.4) Allocation level

Select from:

☑ Company wide

(7.26.6) Allocation method

Select from:

☑ Allocation based on mass of products purchased

(7.26.7) Unit for market value or quantity of goods/services supplied

Select from:

☑ Currency

(7.26.8) Market value or quantity of goods/services supplied to the requesting member

14793775.5

(7.26.9) Emissions in metric tonnes of CO2e

7777.45

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

Ferroalloys and metals used in steel production. Although a high level of scrap is used there are still significant amounts of raw materials

(7.26.12) Allocation verified by a third party?

Select from:

☑ No

(7.26.13) Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

We applied a company wide approach, assigning emissions in each scope category to the client based on mass of products

Row 9

(7.26.1) Requesting member

Select from:

(7.26.2) Scope of emissions

Select from:
☑ Scope 1

(7.26.4) Allocation level

Select from:
☑ Company wide

(7.26.6) Allocation method

Select from:
☑ Allocation based on mass of products purchased

(7.26.7) Unit for market value or quantity of goods/services supplied

Select from:
☑ Currency

(7.26.8) Market value or quantity of goods/services supplied to the requesting member

137064

(7.26.9) Emissions in metric tonnes of CO2e

7.81

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

fossil fuel combution, mainly natural gas

(7.26.12) Allocation verified by a third party?

Select from:
☑ No

(7.26.13) Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

We applied a company wide approach, assigning emissions in each scope category to the client based on mass of products

Row 11

(7.26.1) Requesting member

Select from:

(7.26.2) Scope of emissions

Select from:
☑ Scope 2: market-based

(7.26.4) Allocation level

Select from:

☑ Company wide

(7.26.6) Allocation method

Select from:

☑ Allocation based on mass of products purchased

(7.26.7) Unit for market value or quantity of goods/services supplied

Select from:

☑ Currency

(7.26.8) Market value or quantity of goods/services supplied to the requesting member

137064

(7.26.9) Emissions in metric tonnes of CO2e

2.36

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

emissions from non-renawable electricity

(7.26.12) Allocation verified by a third party?

Select from:

☑ No

(7.26.13) Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

We applied a company wide approach, assigning emissions in each scope category to the client based on mass of products

Row 12

(7.26.1) Requesting member

Select from:

(7.26.2) Scope of emissions

Select from:

☑ Scope 3

(7.26.3) Scope 3 category(ies)

Select all that apply

☑ Category 2: Capital goods

☑ Category 6: Business travel

☑ Category 1: Purchased goods and services

☑ Category 10: Processing of sold products

☑ Category 5: Waste generated in operations

☑ Category 12: End-of-life treatment of sold products

☑ Category 4: Upstream transportation and distribution

☑ Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.26.4) Allocation level

Select from:

☑ Company wide

(7.26.6) Allocation method

Select from:

☑ Allocation based on mass of products purchased

(7.26.7) Unit for market value or quantity of goods/services supplied

Select from:

☑ Currency

(7.26.8) Market value or quantity of goods/services supplied to the requesting member

137064

(7.26.9) Emissions in metric tonnes of CO2e

66.65

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

Ferroalloys and metals used in steel production. Although a high level of scrap is used there are still significant amounts of raw materials

(7.26.12) Allocation verified by a third party?

Select from:

☑ No

(7.26.13) Please explain how you have identified the GHG source, including major limitations to this process and assumptions made

We applied a company wide approach, assigning emissions in each scope category to the client based on mass of products
[Add row]

(7.27) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

Row 1

(7.27.1) Allocation challenges

Select from:

☑ Diversity of product lines makes accurately accounting for each product/product line cost ineffective

(7.27.2) Please explain what would help you overcome these challenges

The variety of customers, a long operational footprint and grouped energy meters in our factories, difficult the task of separating the energy consumption and therefore the emissions of each customer order.
[Add row]

(7.28) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

	Do you plan to develop your capabilities to allocate emissions to your customers in the future?	Describe how you plan to develop your capabilities
	Select from: ☑ Yes	*By calculating emission footprint of each product using LCA approach and assigning based on procured products by client*

[Fixed row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

☑ More than 70% but less than or equal to 75%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:* ☑ No
Consumption of purchased or acquired steam	*Select from:* ☑ No
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ No

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☑ LHV (lower heating value)

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

236888.76

(7.30.1.4) Total (renewable and non-renewable) MWh

236888.76

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

128620.74

(7.30.1.3) MWh from non-renewable sources

31726.54

(7.30.1.4) Total (renewable and non-renewable) MWh

160347.28

Total energy consumption

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

128620.74

(7.30.1.3) MWh from non-renewable sources

268615.29

(7.30.1.4) Total (renewable and non-renewable) MWh

397236.04
[Fixed row]

(7.30.5) Report your organization’s energy consumption totals (excluding feedstocks) for steel production activities in MWh.

Consumption of fuel (excluding feedstocks)

(7.30.5.1) Heating value

Select from:
☑ LHV (lower heating value)

(7.30.5.2) MWh consumed from renewable sources inside steel sector boundary

0

(7.30.5.3) MWh consumed from non-renewable sources inside steel sector boundary (excluding recovered waste heat/gases)

236888.76

(7.30.5.4) MWh consumed from waste heat/gases recovered from processes using fuel feedstocks inside steel sector boundary

0

(7.30.5.5) Total MWh (renewable + non-renewable + MWh from recovered waste heat/gases) consumed inside steel sector boundary

160347.28

Consumption of purchased or acquired electricity

(7.30.5.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.5.2) MWh consumed from renewable sources inside steel sector boundary

128620.74

(7.30.5.3) MWh consumed from non-renewable sources inside steel sector boundary (excluding recovered waste heat/gases)

31726.54

(7.30.5.4) MWh consumed from waste heat/gases recovered from processes using fuel feedstocks inside steel sector boundary

0

(7.30.5.5) Total MWh (renewable + non-renewable + MWh from recovered waste heat/gases) consumed inside steel sector boundary

236888.76

Total energy consumption

(7.30.5.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.5.2) MWh consumed from renewable sources inside steel sector boundary

128620.74

(7.30.5.3) MWh consumed from non-renewable sources inside steel sector boundary (excluding recovered waste heat/gases)

268615.29

(7.30.5.4) MWh consumed from waste heat/gases recovered from processes using fuel feedstocks inside steel sector boundary

0

(7.30.5.5) Total MWh (renewable + non-renewable + MWh from recovered waste heat/gases) consumed inside steel sector boundary

397236.04
[Fixed row]

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ No
Consumption of fuel for the generation of heat	*Select from:* ☑ Yes
Consumption of fuel for the generation of steam	*Select from:* ☑ No
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ No

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.8) Comment

There is no MWh fuel consumed for self-generation of steam because it is a small proportion and we do not have the measurement system to distinguish it

Other biomass

(7.30.7.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.8) Comment

There is no MWh fuel consumed for self-generation of steam because it is a small proportion and we do not have the measurement system to distinguish it

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.8) Comment

There is no MWh fuel consumed for self-generation of steam because it is a small proportion and we do not have the measurement system to distinguish it

Coal

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

(7.30.7.8) Comment

There is no MWh fuel consumed for self-generation of steam because it is a small proportion and we do not have the measurement system to distinguish it

Oil

(7.30.7.1) Heating value

Select from:

☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

2479.43

(7.30.7.8) Comment

There is no MWh fuel consumed for self-generation of steam because it is a small proportion and we do not have the measurement system to distinguish it

Gas

(7.30.7.1) Heating value

Select from:

☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

229595.37

(7.30.7.8) Comment

There is no MWh fuel consumed for self-generation of steam because it is a small proportion and we do not have the measurement system to distinguish it

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

4813.96

(7.30.7.8) Comment

There is no MWh fuel consumed for self-generation of steam because it is a small proportion and we do not have the measurement system to distinguish it

Total fuel

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

236888.76

(7.30.7.8) Comment

There is no MWh fuel consumed for self-generation of steam because it is a small proportion and we do not have the measurement system to distinguish it [Fixed row]

(7.30.14) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in 7.7.

Row 1

(7.30.14.1) Country/area

Select from:

☑ Austria

(7.30.14.2) Sourcing method

Select from:

☑ Retail supply contract with an electricity supplier (retail green electricity)

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Renewable energy mix, please specify :76% Hidropower, 15% Wind and 9% Solar

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

18958.82

(7.30.14.6) Tracking instrument used

Select from:

☑ Contract

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Austria

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ No

(7.30.14.10) Comment

N/A

Row 2

(7.30.14.1) Country/area

Select from:

☑ Spain

(7.30.14.2) Sourcing method

Select from:

☑ Physical power purchase agreement (physical PPA) with a grid-connected generator

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Renewable energy mix, please specify **:**100% Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

80000

(7.30.14.6) Tracking instrument used

Select from:

☑ Contract

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Spain

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ No

(7.30.14.10) Comment

N/A

Row 3

(7.30.14.1) Country/area

Select from:

☑ United States of America

(7.30.14.2) Sourcing method

Select from:

☑ Retail supply contract with an electricity supplier (retail green electricity)

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Nuclear

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

3975

(7.30.14.6) Tracking instrument used

Select from:

☑ Contract

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ United States of America

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ No

(7.30.14.10) Comment

N/A

Row 4

(7.30.14.1) Country/area

Select from:

☑ Norway

(7.30.14.2) Sourcing method

Select from:

☑ Retail supply contract with an electricity supplier (retail green electricity)

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Renewable energy mix, please specify **:**91% Hidropower and 9% Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

985.41

(7.30.14.6) Tracking instrument used

Select from:

☑ Contract

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Norway

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ No

(7.30.14.10) Comment

N/A

Row 5

(7.30.14.1) Country/area

Select from:

☑ Italy

(7.30.14.2) Sourcing method

Select from:

☑ Retail supply contract with an electricity supplier (retail green electricity)

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Renewable energy mix, please specify :51% Hidropower, 23% Wind and 26% Solar

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

3628

(7.30.14.6) Tracking instrument used

Select from:

☑ Contract

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Italy

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ No

(7.30.14.10) Comment

N/A

Row 6

(7.30.14.1) Country/area

Select from:

☑ Spain

(7.30.14.2) Sourcing method

Select from:

☑ Retail supply contract with an electricity supplier (retail green electricity)

(7.30.14.3) Energy carrier

Select from:

☑ Electricity

(7.30.14.4) Low-carbon technology type

Select from:

☑ Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

28297.51

(7.30.14.6) Tracking instrument used

Select from:

☑ Contract

(7.30.14.7) Country/area of origin (generation) of the low-carbon energy or energy attribute

Select from:

☑ Spain

(7.30.14.8) Are you able to report the commissioning or re-powering year of the energy generation facility?

Select from:

☑ No

(7.30.14.10) Comment

The rest of the electricity consumed in Spain is assumed to come from renewable sources, as the supplier has submitted the electricity label "A" (100% of renewable origin) to the National Commission of Markets and Competition in 2022 and does not have at the date of issue of the verification report (February 2024) the information related to 2023; in which case it will be taken into consideration in the sustainability and verification report of 2025 with respect to the 2024 fiscal year. [Add row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Austria

(7.30.16.1) Consumption of purchased electricity (MWh)

18958.82

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

18958.82

Brazil

(7.30.16.1) Consumption of purchased electricity (MWh)

24

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

24.00

Canada

(7.30.16.1) Consumption of purchased electricity (MWh)

674.37

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

674.37

France

(7.30.16.1) Consumption of purchased electricity (MWh)

217.57

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

217.57

Guyana

(7.30.16.1) Consumption of purchased electricity (MWh)

17.7

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

17.70

India

(7.30.16.1) Consumption of purchased electricity (MWh)

11577

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

11577.00

Italy

(7.30.16.1) Consumption of purchased electricity (MWh)

3628

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

3628.00

Kazakhstan

(7.30.16.1) Consumption of purchased electricity (MWh)

61.47

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

61.47

Norway

(7.30.16.1) Consumption of purchased electricity (MWh)

1000.42

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

1000.42

Saudi Arabi

(7.30.16.1) Consumption of purchased electricity (MWh)

2817

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

2817.00

Singapore

(7.30.16.1) Consumption of purchased electricity (MWh)

322.13

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

322.13

Spain

(7.30.16.1) Consumption of purchased electricity (MWh)

108297.51

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

108297.51

Thailand

(7.30.16.1) Consumption of purchased electricity (MWh)

752

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

752.00

United Arab Emirates

(7.30.16.1) Consumption of purchased electricity (MWh)

2732.42

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

2732.42

United States of America

(7.30.16.1) Consumption of purchased electricity (MWh)

9266.87

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

9266.87
[Fixed row]

(7.32) Disclose details on your organization’s consumption of feedstocks for steel production activities.

Row 1

(7.32.1) Feedstocks

Select from:
☑ Coke

(7.32.2) Total consumption

2102.01

(7.32.3) Total consumption unit

Select from:
☑ metric tons

(7.32.4) Dry or wet basis?

Select from:
☑ Dry basis

(7.32.5) Inherent carbon dioxide emission factor of feedstock, metric tons CO2 per consumption unit

3.02

(7.32.6) Heating value of feedstock, MWh per consumption unit

7.83

(7.32.7) Heating value

Select from:

☑ LHV

(7.32.8) Comment

NA

Row 2

(7.32.1) Feedstocks

Select from:

☑ Natural gas

(7.32.2) Total consumption

61993809.86

(7.32.3) Total consumption unit

Select from:

☑ cubic metres

(7.32.4) Dry or wet basis?

Select from:

☑ Dry basis

(7.32.5) Inherent carbon dioxide emission factor of feedstock, metric tons CO2 per consumption unit

0

(7.32.6) Heating value of feedstock, MWh per consumption unit

0.01

(7.32.7) Heating value

Select from:
☑ LHV

(7.32.8) Comment

NA
[Add row]

(7.41) Report your organization’s steel-related consumption, production and capacity figures by steel plant.

Electric arc furnace

(7.41.1) Metal scrap consumption (metric tons)

53612

(7.41.2) Blast furnace iron consumption (metric tons)

512

(7.41.3) Direct reduced iron consumption (metric tons)

0

(7.41.4) Crude steel production (metric tons)

66900

(7.41.5) Crude steel capacity (metric tons)

80000

Other

(7.41.1) Metal scrap consumption (metric tons)

0

(7.41.3) Direct reduced iron consumption (metric tons)

0

(7.41.4) Crude steel production (metric tons)

0

(7.41.5) Crude steel capacity (metric tons)

0

Total

(7.41.1) Metal scrap consumption (metric tons)

53612

(7.41.2) Blast furnace iron consumption (metric tons)

512

(7.41.3) Direct reduced iron consumption (metric tons)

0

(7.41.4) Crude steel production (metric tons)

66900

(7.41.5) Crude steel capacity (metric tons)

80000
[Fixed row]

(7.41.1) Report your organization’s steel-related production outputs and capacities by product.

Row 1

(7.41.1.1) Product

Select from:
☑ Hot-rolled steel

(7.41.1.2) Production (metric tons)

66900

(7.41.1.3) Capacity (metric tons)

80000

(7.41.1.4) Comment

It is ingots not hot rolled, but no option in dropdown
[Add row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.227

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

63245.09

(7.45.3) Metric denominator

Select from:

☑ Other, please specify :Gross Value Added Euros

(7.45.4) Metric denominator: Unit total

278527

(7.45.5) Scope 2 figure used

Select from:

☑ Market-based

(7.45.6) % change from previous year

23.83

(7.45.7) Direction of change

Select from:

☑ Decreased

(7.45.8) Reasons for change

Select all that apply

☑ Other emissions reduction activities

(7.45.9) Please explain

The improvement stems from enhanced efficiency, reduced consumption, and a greater reliance on green energy sources, significantly increasing the overall sustainability impact.
[Add row]

(7.49) State your organization’s emissions and energy intensities by steel production process route.

Row 1

(7.49.1) Process route

Select from:
☑ Scrap-electric arc furnace

(7.49.2) Emissions intensity figure, metric tons CO2e per metric ton of crude steel production

0.43

(7.49.3) Energy intensity figure, GJ (LHV) per metric ton of crude steel production

7.05

(7.49.4) Methodology applied

Select from:
☑ GHG Protocol

(7.49.5) Comment

Applies to Acería Alava. Energy include consumption to convert ingots into bars
[Add row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:

☑ Waste

(7.52.2) Metric value

72530

(7.52.3) Metric numerator

Metric tons

(7.52.4) Metric denominator (intensity metric only)

N/A

(7.52.5) % change from previous year

16.24

(7.52.6) Direction of change

Select from:

☑ Decreased

(7.52.7) Please explain

Although the total amount of tons of waste produced has decreased by 16.24%, the amount of waste recycled and recovered has increased from 81.3% in 2022 to 82.2% in 2023, which demonstrates Tubacex's commitment to recycling 100% of the waste generated.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☑ Absolute target
☑ Intensity target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:
☑ Abs 2

(7.53.1.2) Is this a science-based target?

Select from:
☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.1.3) Science Based Targets initiative official validation letter

Grupo Tubacex S.A. - Near-Term Approval Letter - Monday 8th April 2024.pdf

(7.53.1.4) Target ambition

Select from:
☑ 1.5°C aligned

(7.53.1.5) Date target was set

12/31/2022

(7.53.1.6) Target coverage

Select from:
☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.1.11) End date of base year

12/30/2019

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

67340.08

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

72789.76

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

140129.840

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/30/2030

(7.53.1.55) Targeted reduction from base year (%)

64.32

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

49998.327

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

48540.66

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

14704.43

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

63245.090

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

85.30

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

The target covers all Scope 1 and Scope 2 emissions across all sites within the group. This comprehensive approach ensures that every facility contributes to our overall emissions reduction efforts, aligning with our commitment to sustainability and regulatory compliance. There are no exclusions, as the target is designed to encompass all operations to achieve a unified reduction in our carbon footprint.

(7.53.1.83) Target objective

The strategic objective is to achieve a 64.32% reduction in Scope 1 and Scope 2 emissions by 2030, based on 2019 levels. This target is integral to our long-term sustainability strategy, helping us mitigate climate change impacts and comply with regulatory requirements. By significantly reducing our emissions, we aim to enhance our operational efficiency and contribute to global efforts for carbon neutrality.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

The plan to reach the 64.32% reduction target by 2030 includes purchasing 100% renewable electricity and improving the efficiency of natural gas consumption across our operations. The levers for reducing Scope 1 and 2 emissions are as follows: - Purchase of green electricity across all plants starting in 2025. - Implementation of energy efficiency actions in the plants - Enhancements in the contribution of scrap in the steel mill. Additionally, we plan to progressively introduce green hydrogen as a renewable energy source for specific processes, which aims to further reduce our reliance on fossil fuels.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

Row 2

(7.53.1.1) Target reference number

Select from:

☑ Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

☑ No, but we are reporting another target that is science-based

(7.53.1.5) Date target was set

12/31/2019

(7.53.1.6) Target coverage

Select from:

☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

(7.53.1.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:
☑ Market-based

(7.53.1.11) End date of base year

12/30/2019

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

67234

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

72790

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

140024.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/30/2025

(7.53.1.55) Targeted reduction from base year (%)

50

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

70012.000

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

48540.66

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

14704.43

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

63245.090

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

109.67

(7.53.1.80) Target status in reporting year

Select from:

☑ Replaced

(7.53.1.81) Explain the reasons for the revision, replacement, or retirement of the target

This target vas approved by SBTi in 2019 but we have replaced this target with another one which also approved by the science-based target initiative, changing from sectorial to cross-sectorial approach

(7.53.1.82) Explain target coverage and identify any exclusions

This target covers Scope 1 and 2 emissions from all our sites and facilities. That means the GHG emissions generated by the consumption of Natural gas, diesel on mobile sources, Coke, electrodes, ferroalloys and additives in furnaces and electricity. The SBTi has approve our intensity targets, but we also have absolute targets of reducing scope 1 and 2 emissions that has been achieved this year.

(7.53.1.83) Target objective

The strategic objective is to achieve a 50% reduction in Scope 1 and Scope 2 emissions by 2025, based on 2019 levels.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

[Add row]

(7.53.2) Provide details of your emissions intensity targets and progress made against those targets.

Row 1

(7.53.2.1) Target reference number

Select from:

☑ Int 3

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.2.3) Science Based Targets initiative official validation letter

TUBA-SPA-001-OFF Certificate.pdf

(7.53.2.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.2.5) Date target was set

12/31/2019

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.2.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per metric ton of steel

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.13) Intensity figure in base year for Scope 1 (metric tons CO2e per unit of activity)

1.01

(7.53.2.14) Intensity figure in base year for Scope 2 (metric tons CO2e per unit of activity)

1.09

(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)

2.1000000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2050

(7.53.2.56) Targeted reduction from base year (%)

59

(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)

0.8610000000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

59

(7.53.2.60) Intensity figure in reporting year for Scope 1 (metric tons CO2e per unit of activity)

0.73

(7.53.2.61) Intensity figure in reporting year for Scope 2 (metric tons CO2e per unit of activity)

0.22

(7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)

0.9500000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

92.82

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

The target covers all Scope 1 and Scope 2 emissions across all sites within the group. This comprehensive approach ensures that every facility contributes to our overall emissions reduction efforts, aligning with our commitment to sustainability and regulatory compliance. There are no exclusions, as the target is designed to encompass all operations in order to achieve a unified reduction in our carbon intensity by 59% by 2030.

(7.53.2.86) Target objective

The strategic objective is to achieve a 59% reduction in carbon intensity (measured in tons) for Scope 1 and Scope 2 emissions by 2030, based on 2019 levels. This target is integral to our long-term sustainability strategy, helping us mitigate climate change impacts and comply with regulatory requirements. By significantly reducing our emissions intensity, we aim to enhance our operational efficiency and contribute to global efforts for carbon neutrality.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

The plan to reach the 59% emissions intensity reduction target by 2030 includes several key initiatives: - Purchase of green energy across all plants starting in 2025. - Implementation of energy efficiency actions in the plants - Enhancements in the contribution of scrap in the steel mill. Additionally, we plan to progressively introduce green hydrogen as a renewable energy source for specific processes, aiming to further reduce our reliance on fossil fuels. Regular monitoring and evaluation of our progress will ensure we stay on track to meet this ambitious target.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

Row 2

(7.53.2.1) Target reference number

Select from:

☑ Int 4

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.2.3) Science Based Targets initiative official validation letter

TUBA-SPA-001-OFF Certificate.pdf

(7.53.2.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.2.5) Date target was set

12/31/2019

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 3

(7.53.2.10) Scope 3 categories

Select all that apply

☑ Category 2: Capital goods

☑ Category 6: Business travel

☑ Category 1: Purchased goods and services

☑ Category 5: Waste generated in operations

☑ Category 4: Upstream transportation and distribution

☑ Category 9: Downstream transportation and distribution

☑ Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per metric ton of steel

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.15) Intensity figure in base year for Scope 3, Category 1: Purchased goods and services (metric tons CO2e per unit of activity)

4.02

(7.53.2.16) Intensity figure in base year for Scope 3, Category 2: Capital goods (metric tons CO2e per unit of activity)

0.68

(7.53.2.17) Intensity figure in base year for Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e per unit of activity)

0.51

(7.53.2.18) Intensity figure in base year for Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e per unit of activity)

0.02

(7.53.2.19) Intensity figure in base year for Scope 3, Category 5: Waste generated in operations (metric tons CO2e per unit of activity)

0.0014

(7.53.2.20) Intensity figure in base year for Scope 3, Category 6: Business travel (metric tons CO2e per unit of activity)

0.05

(7.53.2.23) Intensity figure in base year for Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e per unit of activity)

0.15

(7.53.2.32) Intensity figure in base year for total Scope 3 (metric tons CO2e per unit of activity)

5.4314000000

(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)

5.4314000000

(7.53.2.36) % of total base year emissions in Scope 3, Category 1: Purchased goods and services covered by this Scope 3, Category 1: Purchased goods and services intensity figure

100

(7.53.2.37) % of total base year emissions in Scope 3, Category 2: Capital goods covered by this Scope 3, Category 2: Capital goods intensity figure

100

(7.53.2.38) % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) covered by this Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) intensity figure

100

(7.53.2.39) % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution covered by this Scope 3, Category 4: Upstream transportation and distribution intensity figure

100

(7.53.2.40) % of total base year emissions in Scope 3, Category 5: Waste generated in operations covered by this Scope 3, Category 5: Waste generated in operations intensity figure

100

(7.53.2.41) % of total base year emissions in Scope 3, Category 6: Business travel covered by this Scope 3, Category 6: Business travel intensity figure

100

(7.53.2.44) % of total base year emissions in Scope 3, Category 9: Downstream transportation and distribution covered by this Scope 3, Category 9: Downstream transportation and distribution intensity figure

100

(7.53.2.53) % of total base year emissions in Scope 3 (in all Scope 3 categories) covered by this total Scope 3 intensity figure

100.0

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2050

(7.53.2.56) Targeted reduction from base year (%)

30

(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)

3.8019800000

(7.53.2.59) % change anticipated in absolute Scope 3 emissions

30

(7.53.2.62) Intensity figure in reporting year for Scope 3, Category 1: Purchased goods and services (metric tons CO2e per unit of activity)

4.13

(7.53.2.63) Intensity figure in reporting year for Scope 3, Category 2: Capital goods (metric tons CO2e per unit of activity)

1.48

(7.53.2.64) Intensity figure in reporting year for Scope 3, Category 3: Fuel- and energy-related activities (metric tons CO2e per unit of activity)

0.4

(7.53.2.65) Intensity figure in reporting year for Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e per unit of activity)

0.08

(7.53.2.66) Intensity figure in reporting year for Scope 3, Category 5: Waste generated in operations (metric tons CO2e per unit of activity)

0.0014

(7.53.2.67) Intensity figure in reporting year for Scope 3, Category 6: Business travel (metric tons CO2e per unit of activity)

0.005

(7.53.2.70) Intensity figure in reporting year for Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e per unit of activity)

0

(7.53.2.79) Intensity figure in reporting year for total Scope 3 (metric tons CO2e per unit of activity)

6.0964000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)

6.0964000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

-40.81

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

The target covers all Scope 3 emissions across the group, specifically focusing on achieving a 30% reduction in emissions intensity (tons) by 2030, based on 2019 levels. This includes emissions from categories 3.1 (Purchased goods and services), 3.2 (Capital goods), 3.3 (Fuel- and energy-related activities), 3.4 (Upstream transportation and distribution), 3.5 (Waste generated in operations), 3.6 (Business travel), and 3.9 (Downstream transportation and distribution).

(7.53.2.86) Target objective

The strategic objective is to achieve a 30% reduction in Scope 3 emissions intensity (tons) by 2030, relative to 2019 levels.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

To reach the 30% emissions intensity reduction target for Scope 3 by 2030, our plan includes: - Reducing the use of materials in our production processes. - Increasing circularity by utilizing a higher percentage of material from recycled sources. - Lowering emission factors associated with our supply chain and product use. Regular monitoring of these initiatives will help ensure we stay on track to meet our target.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ Yes

Row 3

(7.53.2.1) Target reference number

Select from:

☑ Int 5

(7.53.2.2) Is this a science-based target?

Select from:

☑ Yes, and this target has been approved by the Science Based Targets initiative

(7.53.2.3) Science Based Targets initiative official validation letter

Grupo Tubacex S.A. - Near-Term Approval Letter - Monday 8th April 2024.pdf

(7.53.2.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.2.5) Date target was set

12/31/2022

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 3

(7.53.2.10) Scope 3 categories

Select all that apply

☑ Category 2: Capital goods

☑ Category 6: Business travel

☑ Category 5: Waste generated in operations

☑ Category 4: Upstream transportation and distribution

☑ Category 7: Employee commuting
☑ Category 1: Purchased goods and services
☑ Category 10: Processing of sold products
☑ Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.53.2.11) Intensity metric

Select from:
☑ Other, please specify **:**Metric tons CO2e per EUR (€) value-added

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.15) Intensity figure in base year for Scope 3, Category 1: Purchased goods and services (metric tons CO2e per unit of activity)

0.97

(7.53.2.16) Intensity figure in base year for Scope 3, Category 2: Capital goods (metric tons CO2e per unit of activity)

0.16

(7.53.2.17) Intensity figure in base year for Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e per unit of activity)

0.12

(7.53.2.18) Intensity figure in base year for Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e per unit of activity)

0.004

(7.53.2.19) Intensity figure in base year for Scope 3, Category 5: Waste generated in operations (metric tons CO2e per unit of activity)

0.0003

(7.53.2.20) Intensity figure in base year for Scope 3, Category 6: Business travel (metric tons CO2e per unit of activity)

0.01

(7.53.2.21) Intensity figure in base year for Scope 3, Category 7: Employee commuting (metric tons CO2e per unit of activity)

0

(7.53.2.24) Intensity figure in base year for Scope 3, Category 10: Processing of sold products (metric tons CO2e per unit of activity)

0.01

(7.53.2.32) Intensity figure in base year for total Scope 3 (metric tons CO2e per unit of activity)

1.2743000000

(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)

1.2743000000

(7.53.2.36) % of total base year emissions in Scope 3, Category 1: Purchased goods and services covered by this Scope 3, Category 1: Purchased goods and services intensity figure

100

(7.53.2.37) % of total base year emissions in Scope 3, Category 2: Capital goods covered by this Scope 3, Category 2: Capital goods intensity figure

100

(7.53.2.38) % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) covered by this Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) intensity figure

100

(7.53.2.39) % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution covered by this Scope 3, Category 4: Upstream transportation and distribution intensity figure

100

(7.53.2.40) % of total base year emissions in Scope 3, Category 5: Waste generated in operations covered by this Scope 3, Category 5: Waste generated in operations intensity figure

100

(7.53.2.41) % of total base year emissions in Scope 3, Category 6: Business travel covered by this Scope 3, Category 6: Business travel intensity figure

100

(7.53.2.42) % of total base year emissions in Scope 3, Category 7: Employee commuting covered by this Scope 3, Category 7: Employee commuting intensity figure

100

(7.53.2.45) % of total base year emissions in Scope 3, Category 10: Processing of sold products covered by this Scope 3, Category 10: Processing of sold products intensity figure

100

(7.53.2.53) % of total base year emissions in Scope 3 (in all Scope 3 categories) covered by this total Scope 3 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100.0

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

55.4

(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)

0.5683378000

(7.53.2.59) % change anticipated in absolute Scope 3 emissions

55.4

(7.53.2.62) Intensity figure in reporting year for Scope 3, Category 1: Purchased goods and services (metric tons CO2e per unit of activity)

0.99

(7.53.2.63) Intensity figure in reporting year for Scope 3, Category 2: Capital goods (metric tons CO2e per unit of activity)

0.36

(7.53.2.64) Intensity figure in reporting year for Scope 3, Category 3: Fuel- and energy-related activities (metric tons CO2e per unit of activity)

0.1

(7.53.2.65) Intensity figure in reporting year for Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e per unit of activity)

0.02

(7.53.2.66) Intensity figure in reporting year for Scope 3, Category 5: Waste generated in operations (metric tons CO2e per unit of activity)

0.0003

(7.53.2.67) Intensity figure in reporting year for Scope 3, Category 6: Business travel (metric tons CO2e per unit of activity)

0.001

(7.53.2.68) Intensity figure in reporting year for Scope 3, Category 7: Employee commuting (metric tons CO2e per unit of activity)

0

(7.53.2.71) Intensity figure in reporting year for Scope 3, Category 10: Processing of sold products (metric tons CO2e per unit of activity)

0.01

(7.53.2.79) Intensity figure in reporting year for total Scope 3 (metric tons CO2e per unit of activity)

1.4813000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)

1.4813000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

-29.32

(7.53.2.83) Target status in reporting year

Select from:

☑ Underway

(7.53.2.85) Explain target coverage and identify any exclusions

The target encompasses all Scope 3 emissions across the group, specifically aiming for a 55% reduction in emissions intensity relative to value added (VAB) by 2030. This includes emissions from categories 3.1 (Purchased goods and services), 3.2 (Capital goods), 3.3 (Fuel- and energy-related activities), 3.4 (Upstream transportation and distribution), 3.5 (Waste generated in operations), 3.6 (Business travel), 3.9 (Downstream transportation and distribution), as well as 3.10 (Processing of sold products) and 3.12 (End-of-life treatment of sold products).

(7.53.2.86) Target objective

The strategic objective is to achieve a 55% reduction in Scope 3 emissions intensity relative to VAB by 2030. This ambitious target is crucial for enhancing our sustainability practices and minimizing our carbon footprint across the value chain.

(7.53.2.87) Plan for achieving target, and progress made to the end of the reporting year

To achieve the 55% emissions intensity reduction target for Scope 3 by 2030, our plan includes: - Reducing the use of materials in our production processes to enhance resource efficiency. - Increasing circularity by sourcing a greater percentage of materials from recycled sources, thereby minimizing waste. - Lowering emission factors throughout our supply chain to decrease the overall carbon footprint associated with our operations. We will regularly review these initiatives to ensure that we remain on track to meet our target, promoting sustainability and operational efficiency throughout the organization.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ No

Row 4

(7.53.2.1) Target reference number

Select from:

☑ Int 1

(7.53.2.2) Is this a science-based target?

Select from:

☑ No, but we are reporting another target that is science-based

(7.53.2.5) Date target was set

12/30/2020

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.53.2.9) Scope 2 accounting method

Select from:

☑ Market-based

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per metric ton of steel

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.13) Intensity figure in base year for Scope 1 (metric tons CO2e per unit of activity)

0.24

(7.53.2.14) Intensity figure in base year for Scope 2 (metric tons CO2e per unit of activity)

0.26

(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)

0.5000000000

(7.53.2.34) % of total base year emissions in Scope 1 covered by this Scope 1 intensity figure

100

(7.53.2.35) % of total base year emissions in Scope 2 covered by this Scope 2 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

60

(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)

0.2000000000

(7.53.2.58) % change anticipated in absolute Scope 1+2 emissions

60

(7.53.2.60) Intensity figure in reporting year for Scope 1 (metric tons CO2e per unit of activity)

0.17

(7.53.2.61) Intensity figure in reporting year for Scope 2 (metric tons CO2e per unit of activity)

0.05

(7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)

0.2200000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

93.33

(7.53.2.83) Target status in reporting year

Select from:

☑ Replaced

(7.53.2.84) Explain the reasons for the revision, replacement, or retirement of the target

We have replaced this target with another one which has been approved by the science-based target initiative

(7.53.2.85) Explain target coverage and identify any exclusions

In line with the new TUBACEX 2022-25 strategic plan, TUBACEX drives forward its diversification strategy to achieve a more balanced business mix with a focus on gas, power, and energy. To achieve a more balanced business mix with a focus on gas, energy transition towards green energies and an alternative to coal, TUBACEX is defining its transformation into a supplier of sophisticated industrial products and high-value-added services for the energy and mobility sector without losing its hallmarks. In this context, the ton of steel produced is no longer a representative indicator of our activity. That's why we have revised our targets and commitments and set new ones based on the value-added. As the intensity target of reducing scope 1 and 2 emissions to tons of steel sold is a target approved by the SBTi, we have calculated it and reported it as an additional indicator of the carbon performance of TUBACEX in 2021. The approved target is to reduce scope 1 and 2 carbon intensity by a ton of steel sold by 59% in 2030 from a 2019 base year.

(7.53.2.86) Target objective

The strategic objective is to achieve a 60% reduction in carbon intensity (measured in tons) for Scope 1 and Scope 2 emissions by 2030, based on 2019 levels

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ No

Row 5

(7.53.2.1) Target reference number

Select from:

☑ Int 2

(7.53.2.2) Is this a science-based target?

Select from:

☑ No, but we are reporting another target that is science-based

(7.53.2.5) Date target was set

12/30/2020

(7.53.2.6) Target coverage

Select from:

☑ Organization-wide

(7.53.2.7) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

(7.53.2.8) Scopes

Select all that apply

☑ Scope 3

(7.53.2.10) Scope 3 categories

Select all that apply

☑ Category 2: Capital goods

☑ Category 6: Business travel

☑ Category 1: Purchased goods and services

☑ Category 5: Waste generated in operations

☑ Category 4: Upstream transportation and distribution

☑ Category 9: Downstream transportation and distribution

☑ Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.53.2.11) Intensity metric

Select from:

☑ Metric tons CO2e per metric ton of steel

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.15) Intensity figure in base year for Scope 3, Category 1: Purchased goods and services (metric tons CO2e per unit of activity)

0.97

(7.53.2.16) Intensity figure in base year for Scope 3, Category 2: Capital goods (metric tons CO2e per unit of activity)

0.16

(7.53.2.17) Intensity figure in base year for Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e per unit of activity)

0.12

(7.53.2.18) Intensity figure in base year for Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e per unit of activity)

0.004

(7.53.2.19) Intensity figure in base year for Scope 3, Category 5: Waste generated in operations (metric tons CO2e per unit of activity)

0.0003

(7.53.2.20) Intensity figure in base year for Scope 3, Category 6: Business travel (metric tons CO2e per unit of activity)

0.01

(7.53.2.23) Intensity figure in base year for Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e per unit of activity)

0.04

(7.53.2.32) Intensity figure in base year for total Scope 3 (metric tons CO2e per unit of activity)

1.3043000000

(7.53.2.33) Intensity figure in base year for all selected Scopes (metric tons CO2e per unit of activity)

1.3043000000

(7.53.2.36) % of total base year emissions in Scope 3, Category 1: Purchased goods and services covered by this Scope 3, Category 1: Purchased goods and services intensity figure

100

(7.53.2.37) % of total base year emissions in Scope 3, Category 2: Capital goods covered by this Scope 3, Category 2: Capital goods intensity figure

100

(7.53.2.38) % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) covered by this Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) intensity figure

100

(7.53.2.39) % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution covered by this Scope 3, Category 4: Upstream transportation and distribution intensity figure

100

(7.53.2.40) % of total base year emissions in Scope 3, Category 5: Waste generated in operations covered by this Scope 3, Category 5: Waste generated in operations intensity figure

100

(7.53.2.41) % of total base year emissions in Scope 3, Category 6: Business travel covered by this Scope 3, Category 6: Business travel intensity figure

100

(7.53.2.44) % of total base year emissions in Scope 3, Category 9: Downstream transportation and distribution covered by this Scope 3, Category 9: Downstream transportation and distribution intensity figure

100

(7.53.2.53) % of total base year emissions in Scope 3 (in all Scope 3 categories) covered by this total Scope 3 intensity figure

100

(7.53.2.54) % of total base year emissions in all selected Scopes covered by this intensity figure

100

(7.53.2.55) End date of target

12/30/2030

(7.53.2.56) Targeted reduction from base year (%)

30

(7.53.2.57) Intensity figure at end date of target for all selected Scopes (metric tons CO2e per unit of activity)

0.9130100000

(7.53.2.59) % change anticipated in absolute Scope 3 emissions

30

(7.53.2.62) Intensity figure in reporting year for Scope 3, Category 1: Purchased goods and services (metric tons CO2e per unit of activity)

0.99

(7.53.2.63) Intensity figure in reporting year for Scope 3, Category 2: Capital goods (metric tons CO2e per unit of activity)

0.36

(7.53.2.64) Intensity figure in reporting year for Scope 3, Category 3: Fuel- and energy-related activities (metric tons CO2e per unit of activity)

0.1

(7.53.2.65) Intensity figure in reporting year for Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e per unit of activity)

0.02

(7.53.2.66) Intensity figure in reporting year for Scope 3, Category 5: Waste generated in operations (metric tons CO2e per unit of activity)

0.0003

(7.53.2.67) Intensity figure in reporting year for Scope 3, Category 6: Business travel (metric tons CO2e per unit of activity)

0.001

(7.53.2.70) Intensity figure in reporting year for Scope 3, Category 9: Downstream transportation and distribution (metric tons CO2e per unit of activity)

0

(7.53.2.79) Intensity figure in reporting year for total Scope 3 (metric tons CO2e per unit of activity)

1.4713000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes (metric tons CO2e per unit of activity)

1.4713000000

(7.53.2.81) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.2.82) % of target achieved relative to base year

-42.68

(7.53.2.83) Target status in reporting year

Select from:

☑ Replaced

(7.53.2.84) Explain the reasons for the revision, replacement, or retirement of the target

We have replaced this target with another one which has been approved by the science-based target initiative

(7.53.2.85) Explain target coverage and identify any exclusions

In line with the new TUBACEX 2022-25 strategic plan, TUBACEX drives forward its diversification strategy to achieve a more balanced business mix with a focus on gas, power, and energy. To achieve a more balanced business mix with a focus on gas, energy transition towards green energies and an alternative to coal, TUBACEX is defining its transformation into a supplier of sophisticated industrial products and high-value-added services for the energy and mobility sector without

losing its hallmarks. In this context, the ton of steel produced is no longer a representative indicator of our activity. That's why we have revised our targets and commitments and set new ones based on the value-added. As the intensity target of reducing scope 1 and 2 emissions to tons of steel sold is a target approved by the SBTi, we have calculated it and reported it as an additional indicator of the carbon performance of TUBACEX in 2021. The approved target is to reduce scope 1 and 2 carbon intensity by a ton of steel sold by 59% in 2030 from a 2019 base year.

(7.53.2.86) Target objective

The strategic objective is to achieve a 30% reduction in Scope 3 emissions intensity (tons) by 2030, relative to 2019 levels.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:

☑ No

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☑ Targets to increase or maintain low-carbon energy consumption or production

☑ Net-zero targets

☑ Other climate-related targets

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

Row 1

(7.54.1.1) Target reference number

Select from:

☑ Low 1

(7.54.1.2) Date target was set

12/30/2021

(7.54.1.3) Target coverage

Select from:

☑ Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

☑ All energy carriers

(7.54.1.5) Target type: activity

Select from:

☑ Consumption

(7.54.1.6) Target type: energy source

Select from:

☑ Low-carbon energy source(s)

(7.54.1.7) End date of base year

12/30/2019

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

517364

(7.54.1.9) % share of low-carbon or renewable energy in base year

0

(7.54.1.10) End date of target

12/30/2030

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

40

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

33.7

(7.54.1.13) % of target achieved relative to base year

84.25

(7.54.1.14) Target status in reporting year

Select from:

☑ Underway

(7.54.1.16) Is this target part of an emissions target?

This target is part of Abs1, Int1 and Int3.

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

☑ No, it's not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

The target to achieve 40% green energy by 2030 covers the primary energy-consuming plants within our organization. This includes purchased/acquired renewable energy sources, ensuring that all key facilities contribute toward meeting the goal. There are no exclusions to this target, as it is applied organization-wide, including all relevant operational areas with significant energy demands. This comprehensive approach allows us to maximize our impact in reducing carbon emissions across the organization. The target forms part of our broader strategy for long-term sustainability and carbon neutrality, aligning with regulatory requirements and industry best practices.

(7.54.1.20) Target objective

The objective of this target is to increase the share of green energy consumption to 40% by 2030, significantly reducing our dependence on fossil fuels.

(7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

To achieve the 40% green energy target by 2030, we will implement a range of strategic initiatives, including securing long-term Power Purchase Agreements (PPAs) with renewable energy providers and enhancing energy efficiency measures across our facilities. A key component of our plan is the purchase of green electricity for all plants starting in 2025, which will play a crucial role in reaching our target.
[Add row]

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

Row 1

(7.54.2.1) Target reference number

Select from:
☑ Oth 2

(7.54.2.2) Date target was set

01/01/2021

(7.54.2.3) Target coverage

Select from:
☑ Business activity

(7.54.2.4) Target type: absolute or intensity

Select from:
☑ Absolute

(7.54.2.5) Target type: category & Metric (target numerator if reporting an intensity target)

Waste management

☑ Other waste management, please specify :Percentage of recycled materials consumed.

(7.54.2.7) End date of base year

12/30/2019

(7.54.2.8) Figure or percentage in base year

60

(7.54.2.9) End date of target

12/30/2030

(7.54.2.10) Figure or percentage at end of date of target

95

(7.54.2.11) Figure or percentage in reporting year

82.3

(7.54.2.12) % of target achieved relative to base year

63.7142857143

(7.54.2.13) Target status in reporting year

Select from:

☑ Underway

(7.54.2.15) Is this target part of an emissions target?

Not directly but indirectly it is because increasing the use of recycled materials reduces Scope 3 emissions from materials.

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

☑ No, it's not part of an overarching initiative

(7.54.2.18) Please explain target coverage and identify any exclusions

The 95% recycling target for 2030 applies to our entire organization. It focuses on increasing the use of scrap metal in steel manufacturing and recovering other minerals from valorization processes. Given the capacity of our furnaces and our experience in scrap recovery, we believe this goal is achievable.

(7.54.2.19) Target objective

The objective is to recycle 95% of all waste generated across our entire organization by 2030. This target supports our sustainability strategy by minimizing landfill waste and promoting a circular economy.

(7.54.2.20) Plan for achieving target, and progress made to the end of the reporting year

To meet the 95% recycling target by 2030, we will continue our mineral recovery projects and adopt a strategic approach to optimize scrap purchasing, ensuring that we enhance the inputs for our furnaces. This includes improving our operational practices and leveraging the accumulated experience in scrap recovery to maximize efficiency.
[Add row]

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

☑ NZ3

(7.54.3.2) Date target was set

12/31/2022

(7.54.3.3) Target Coverage

Select from:

☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply

☑ Abs2

(7.54.3.5) End date of target for achieving net zero

12/30/2050

(7.54.3.6) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.54.3.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

☑ Hydrofluorocarbons (HFCs)

(7.54.3.10) Explain target coverage and identify any exclusions

Scope 1 y 2

(7.54.3.11) Target objective

9809 tn CO2e in S1S2 from a baseline in 2019 of 140130 or a reduction of 93%, as calculated with the SBTi Net-Zero-Tool with an absosulte contraction method and Iron and Steel pathway. This target replaces previous target NZ1/NZ2 reported in previous years

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☑ Unsure

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

☑ No, and we do not plan to within the next two years

(7.54.3.17) Target status in reporting year

Select from:

☑ Underway

(7.54.3.19) Process for reviewing target

There is pathway detailed by site, scope and year, aligned with the 2030 targets and the period 2031-2050. This pathway has been validated with the management committee and the board and reviewed at least once a year. This pathway has also been shared with key stakeholders and included in some finance operations, with the compromise of tubacex to monitor and report progress. In the 2024 CSRD report, This pathway will be reported.

Row 2

(7.54.3.1) Target reference number

Select from:

☑ NZ1

(7.54.3.2) Date target was set

12/31/2019

(7.54.3.3) Target Coverage

Select from:

☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply

☑ Abs2

(7.54.3.5) End date of target for achieving net zero

12/30/2050

(7.54.3.6) Is this a science-based target?

Select from:

☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.54.3.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)
☑ Methane (CH4)
☑ Nitrous oxide (N2O)

(7.54.3.10) Explain target coverage and identify any exclusions

Scope 1 and 2 in intensity by Tn

(7.54.3.11) Target objective

This target covers scope 1 and 2 emissions in all our facilities and business divisions. This target is a SBT target that has been recently approved. The objective is to achieve net-zero by 2050 by reducing as much as we can energy consumption and raw materials consumption. To do so, we have several sustainability plans in place, and when no more emissions can be reduced, we will offset our residual emissions investing in nature-based solution projects.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:
☑ Unsure

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:
☑ No, and we do not plan to within the next two years

(7.54.3.17) Target status in reporting year

Select from:
☑ Replaced

(7.54.3.18) Explain the reasons for the revision, retirement, or replacement of the target

Move from an intensity based to absolute target based on last SBTi criteria

(7.54.3.19) Process for reviewing target

Yearly review by management Committee and Board

Row 3

(7.54.3.1) Target reference number

Select from:
☑ NZ2

(7.54.3.2) Date target was set

12/31/2019

(7.54.3.3) Target Coverage

Select from:
☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply
☑ Int2

(7.54.3.5) End date of target for achieving net zero

12/30/2050

(7.54.3.6) Is this a science-based target?

Select from:
☑ Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.54.3.8) Scopes

Select all that apply

☑ Scope 3

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)

☑ Methane (CH4)

☑ Nitrous oxide (N2O)

(7.54.3.10) Explain target coverage and identify any exclusions

Scope 3

(7.54.3.11) Target objective

This target covers scope 3 emissions mainly related to purchased goods and services in all our facil- ities and business divisions. This target is a SBT target that has been recently approved. The objective is to achieve net-zero by 2050 by reducing as much as we can energy consump- tion, raw materials consumption and improving circularity. To do so, we have several sustain- ability plans in place, and when no more emissions can be reduced, we will offset our residual emissions investing in nature-based solution projects.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☑ Unsure

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

☑ No, and we do not plan to within the next two years

(7.54.3.17) Target status in reporting year

Select from:

☑ Replaced

(7.54.3.18) Explain the reasons for the revision, retirement, or replacement of the target

Align with new SBTi targets based on economic intensity. We are developing a new one for Scope 3 and we intend to present it in the next two years to SBTi

(7.54.3.19) Process for reviewing target

Yearly review by management Committee and Board
[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:
☑ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	*9*	*`Numeric input*
To be implemented	*49*	*5676*
Implementation commenced	*0*	*0*
Implemented	*3*	*4239*
Not to be implemented	*2*	*`Numeric input*

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☑ Motors and drives

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

3639

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in C0.4)

659829

(7.55.2.6) Investment required (unit currency – as specified in C0.4)

57500

(7.55.2.7) Payback period

Select from:

☑ <1 year

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ 16-20 years

(7.55.2.9) Comment

Implementation of systems to enhance motor efficiency in industrial furnaces.

Row 2

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes

☑ Smart control system

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

366

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in C0.4)

17338

(7.55.2.6) Investment required (unit currency – as specified in C0.4)

69900

(7.55.2.7) Payback period

Select from:

☑ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ 16-20 years

(7.55.2.9) Comment

Implementation of a system to regulate pressure in industrial furnaces

Row 3

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

☑ Lighting

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

234

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 2 (location-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in C0.4)

26875

(7.55.2.6) Investment required (unit currency – as specified in C0.4)

120000

(7.55.2.7) Payback period

Select from:

☑ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ Ongoing

(7.55.2.9) Comment

Replace lightning with efficient LED
[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☑ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

Tubacex annually analyses the different regulatory requirements they must comply with and ensures their completion. Additionally, Tubacex has a budget for energy efficiency measures, such as lighting replacement or energy-efficient equipment replacement. Regarding low-carbon investments, Tubacex is always searching for new R&D projects and emission reduction initiatives that help reduce their impact on climate change, such as the creation of a new material recycling installation. Finally, as part of their climate change commitments and the initiatives they have in place, Tubacex committed to the SBT

Row 4

(7.55.3.1) Method

Select from:

☑ Dedicated budget for energy efficiency

(7.55.3.2) Comment

Tubacex annually analyses the different regulatory requirements they must comply with and ensures their completion. Additionally, Tubacex has a budget for energy efficiency measures, such as lighting replacement or energy-efficient equipment replacement. Regarding low-carbon investments, Tubacex is always searching for new R&D projects and emission reduction initiatives that help reduce their impact on climate change, such as the creation of a new material recycling installation. Finally, as part of their climate change commitments and the initiatives they have in place, Tubacex committed to the SBTi and they have now validated their targets.

Row 6

(7.55.3.1) Method

Select from:

☑ Dedicated budget for low-carbon product R&D

(7.55.3.2) Comment

TUBACEX annually analyses the different regulatory requirements they have to comply with and ensures their completion. Additionally, TUBACEX has a budget for energy efficiency measures, such as lighting replacement or energy-efficient equipment replacement. Regarding low-carbon investments, TUBACEX is always searching for new R&D projects and emission reduction initiatives that help reduce their impact on climate change, such as the creation of a new material recycling

installation. Finally, as part of their climate change commitments and the initiatives they have in place, TUBACEX committed to the SBTi and they have now validated their targets. As of today, 60% of the R&D expenditure is dedicated to developments targeting, directly or indirectly, the green economy (hydrogen & renewables), CO2 emissions reduction or circular economy.

Row 7

(7.55.3.1) Method

Select from:

☑ Dedicated budget for other emissions reduction activities

(7.55.3.2) Comment

TUBACEX annually analyses the different regulatory requirements they have to comply with and ensures their completion. Additionally, TUBACEX has a budget for energy efficiency measures, such as lighting replacement or energy-efficient equipment replacement. Regarding low-carbon investments, Tubacex is always searching for new R&D projects and emission reduction initiatives that help reduce their impact on climate change, such as the creation of a new material recycling installation. Finally, as part of their climate change commitments and the initiatives they have in place, TUBACEX committed to the SBTi and they have now validated their targets. As of today, 60% of the R&D expenditure is dedicated to developments targeting, directly or indirectly, the green economy (hydrogen & renewables), CO2 emissions reduction or circular economy.

Row 8

(7.55.3.1) Method

Select from:

☑ Other **:**SBTi Commitment

(7.55.3.2) Comment

TUBACEX annually analyses the different regulatory requirements they must comply with and ensures their completion. Additionally, TUBACEX has a budget for energy efficiency measures, such as lighting replacement or energy-efficient equipment replacement. Regarding low-carbon investments, Tubacex is always searching for new R&D projects and emission reduction initiatives that help reduce their impact on climate change, such as the creation of a new material recycling installation. Finally, as part of their climate change commitments and the initiatives they have in place, Tubacex committed to the SBTi and they have now validated their targets.
[Add row]

(7.65) Disclose your organization’s best available techniques as a percentage of total plant capacity.

Electric arc furnace: Scrap preheating

(7.65.1) % of total plant capacity

0

(7.65.2) Primary reason for not having technique

Select from:
☑ Other, please specify :Low volume, discrete process

Electric arc furnace: Oxy-fuel burners

(7.65.1) % of total plant capacity

0

(7.65.2) Primary reason for not having technique

Select from:
☑ Other, please specify :Low volume, discrete process

Electric arc furnace: Oxygen blowing for liquid steel oxidation or post combustion

(7.65.1) % of total plant capacity

0

(7.65.2) Primary reason for not having technique

Select from:
☑ Other, please specify :Low volume, discrete process

Electric arc furnace: Integrated, real-time process control and monitoring systems

(7.65.1) % of total plant capacity

100

(7.65.3) Comment

The percentage of total plant capacity refers to the steel mill plant.

Casting: Absence of soaking pits and primary rolling of ingots

(7.65.1) % of total plant capacity

0

(7.65.2) Primary reason for not having technique

Select from:
☑ Other, please specify **:**Low volume, discrete process

Casting: Near net shape casting, e.g. thin slab, thin strip, etc.

(7.65.1) % of total plant capacity

15

(7.65.3) Comment

The percentage of total plant capacity refers to the steel mill plant.

Hot rolling mill: Hot charging

(7.65.1) % of total plant capacity

70

(7.65.3) Comment

The percentage of total plant capacity refers to the steel mill plant.

Hot rolling mill: Recuperative/regenerative burners

(7.65.1) % of total plant capacity

0

(7.65.2) Primary reason for not having technique

Select from:

☑ Other, please specify **:**Low volume, discrete process

Hot rolling mill: Walking beam furnace

(7.65.1) % of total plant capacity

10

(7.65.3) Comment

The percentage of total plant capacity refers to the steel mill plant.

Hot rolling mill: Variable speed drives on combustion air fans of reheat furnace

(7.65.1) % of total plant capacity

100

(7.65.3) Comment

The percentage of total plant capacity refers to the steel mill plant.

[Fixed row]

(7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☑ No

(7.79) Has your organization canceled any project-based carbon credits within the reporting year?

Select from:

☑ No

C9. Environmental performance - Water security

(9.1) Are there any exclusions from your disclosure of water-related data?

Select from:

☑ No

(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Consumes from plants (invoices or meters)

(9.2.4) Please explain

We currently measure water intake from three different sources: municipal water, surface water or groundwater. In the calculation of our water intensity we eliminate groundwater as it is a consumption of water that is returned to the river or collector after its use in the industrial process. However, we are working on a project to measure withdrawals and discharges according to all the required criteria. This information will be included in the 2024 sustainability report as part of the requirements of the Corporate Sustainability Reporting Directive.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Consumes from plants (invoices or meters)

(9.2.4) Please explain

We currently measure water intake from three different sources: municipal water, surface water or groundwater. In the calculation of our water intensity we eliminate groundwater as it is a consumption of water that is returned to the river or collector after its use in the industrial process. However, we are working on a project to measure withdrawals and discharges according to all the required criteria. This information will be included in the 2024 sustainability report as part of the requirements of the Corporate Sustainability Reporting Directive.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes. Water withdrawals and discharges are part of the management (quality, emissions, volumes per source...).

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Unknown

(9.2.3) Method of measurement

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes.

(9.2.4) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes. Water withdrawals and discharges are part of the management (quality, emissions, volumes per source...).

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Unknown

(9.2.3) Method of measurement

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes.

(9.2.4) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes. Water withdrawals and discharges are part of the management (quality, emissions, volumes per source...).

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Unknown

(9.2.3) Method of measurement

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes.

(9.2.4) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes. Water withdrawals and discharges are part of the management (quality, emissions, volumes per source...).

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not monitored

(9.2.4) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes. Water withdrawals and discharges are part of the management (quality, emissions, volumes per source...).

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Unknown

(9.2.3) Method of measurement

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes.

(9.2.4) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes. Water withdrawals and discharges are part of the management (quality, emissions, volumes per source...).

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not monitored

(9.2.4) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the group, following the standard and with specific environmental processes. Water withdrawals and discharges are part of the management (quality, emissions, volumes per source...).

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:

☑ 100%

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Consumes from plants (invoices or meters). Our current corporate model is not consolidating total discharges, so consumption is equal to Withdrawals. Our manufacturing plants are ISO 14001 certified so discharges are monitored at plant level.

(9.2.4) Please explain

We currently measure water intake from three different sources: municipal water, surface water or groundwater. In the calculation of our water intensity we eliminate groundwater as it is a consumption of water that is returned to the river or collector after its use in the industrial process. However, we are working on a project to measure withdrawals and discharges according to all the required criteria. This information will be included in the 2024 sustainability report as part of the requirements of the Corporate Sustainability Reporting Directive.
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

1515.9

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Investment in water-smart technology/process

(9.2.2.4) Five-year forecast

Select from:

☑ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in business activity

(9.2.2.6) Please explain

Our water accounting methodolgy is under review, and will incorporate more informarmation to have a complete view of our water balance.

Total discharges

(9.2.2.1) Volume (megaliters/year)

0

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ This is our first year of measurement

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.2.4) Five-year forecast

Select from:

☑ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in efficiency

(9.2.2.6) Please explain

Our water accounting methodolgy is under review, and will incorporate more informarmation to have a complete view of our water balance. We currently measure withdrawals, being consumptions only considering water withdrawals.

Total consumption

(9.2.2.1) Volume (megaliters/year)

1515.9

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Investment in water-smart technology/process

(9.2.2.4) Five-year forecast

Select from:

☑ Lower

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in efficiency

(9.2.2.6) Please explain

Our water accounting methodolgy is under review, and will incorporate more informarmation to have a complete view of our water balance. We currently measure withdrawals, being consumptions only considering water withdrawals.
[Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

(9.2.4.1) Withdrawals are from areas with water stress

Select from:

☑ Yes

(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

34

(9.2.4.3) Comparison with previous reporting year

Select from:
☑ About the same

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in efficiency

(9.2.4.5) Five-year forecast

Select from:
☑ Lower

(9.2.4.6) Primary reason for forecast

Select from:
☑ Investment in water-smart technology/process

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

2.24

(9.2.4.8) Identification tool

Select all that apply
☑ WWF Water Risk Filter

☑ Other, please specify **:**Task Force on Nature-Related Financial Disclosures CDSB (2021): Application guidance for water-related disclosures Natural Capital Protocol (NCC).

(9.2.4.9) Please explain

We have carried out an impact, dependencies, risks and opportunities assessment. Firstly we have identified material locations considering: volume of sales, production (tons), water consumptions and location. Considering different tools to analyze the scarcity risk we have considered that plants located at Italy (IBF Piaccenza) and Oklahoma (Tubacex Durant) are those with the highest water scarcity ratings (very high) Spanish and Austrian plants (ACERALAVA, TTI and SBER), as well as the one in Vittuone (IBF) are those presenting a MEDIUM in water scarcity. If we consider algo MEDIUM water scarcity in the assessment our total weithdrawals from areas with water stress would go up to 1466,1.
[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:
☑ Relevant

(9.2.7.2) Volume (megaliters/year)

89.58

(9.2.7.3) Comparison with previous reporting year

Select from:
☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

We regularly measure water use from surface sources to evaluate the efficiency measures implemented at the plants.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:
☑ Not relevant

(9.2.7.5) Please explain

We do not use seawater in our productions processes

Groundwater – renewable

(9.2.7.1) Relevance

Select from:
☑ Relevant

(9.2.7.2) Volume (megaliters/year)

1241

(9.2.7.3) Comparison with previous reporting year

Select from:
☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

We regularly measure water use from surface sources to evaluate the efficiency measures implemented at the plants. At IBF (Italy) there is a high dependence on the aquifer for water use. The quality of the aquifers and surface water bodies is considered, on the whole, to be good.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

The groundwater used comes from aquifers.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

We do not use produced water in our productions processes

Third party sources

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

185.33

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

We regularly measure water use from municipal sources to evaluate the efficiency measures implemented at the plants.
[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:

☑ Not relevant

(9.2.8.5) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the Group, following the standard and with specific environmental processes. That inluyes measuring and managing all aspects related to water.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☑ Relevant but volume unknown

(9.2.8.5) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the Group, following the standard and with specific environmental processes. That inluyes measuring and managing all aspects related to water.

Groundwater

(9.2.8.1) Relevance

Select from:

☑ Relevant but volume unknown

(9.2.8.5) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the Group, following the standard and with specific environmental processes. That inluyes measuring and managing all aspects related to water.

Third-party destinations

(9.2.8.1) Relevance

Select from:

☑ Relevant but volume unknown

(9.2.8.5) Please explain

This information is not consolidated at Group level. Manufacturing plants around the world manage environmental aspects following the ISO 14001 standard, being mainly certified or, if not certified because they are recent additions to the Group, following the standard and with specific environmental processes. That inluyes measuring and managing all aspects related to water.

[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

Direct operations

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

11

(9.3.3) % of facilities in direct operations that this represents

Select from:

☑ 51-75

(9.3.4) Please explain

To identify Tubacex's material locations, the organization carried out an assessment of the physical locations and specific sites with a significant impact on the enviroment. Forty-three sites were included, covering the steel plant, production plants, distribution centers, warehouses and corporate offices, where the company has significant operations. Following the basis of the TNFD, the proposed methodology consists of a contextual analysis of Tubacex locations. Prioritization is based on two criteria: on the one hand, their materiality, and on the other, their sensitivity in relation to water. The analysis of the ecological context of the locations consists of identifying the study locations and using the appropriate bibliographic resources and tools to determine the status of the locations with respect to nature through a selection of indicators. For water risk indicators, the WWF water risk filter was used. The following criteria established in the TNFD framework were used to determine the sensitive areas: Areas of high physical water risks; Drought risk, Flood risk, Water quality and Ecosystem service (water) status, using wwf from aqueduct data as a source.

Upstream value chain

(9.3.1) Identification of facilities in the value chain stage

Select from:

☑ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, but we are planning to do so in the next 2 years

(9.3.4) Please explain

We are in a process to identify environmental dependencies, impacts, risk and opportunities in the supply chain and planning the extension to the whole value chain (scope: tier 1)
[Fixed row]

(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.

Row 1

(9.3.1.1) Facility reference number

Select from:

☑ Facility 1

(9.3.1.2) Facility name (optional)

ACERÍA DE ÁLAVA, S.A.U.

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals only

(9.3.1.6) Reason for no withdrawals and/or discharges

Our current methology only considers consumption (from municipal and surface water)

(9.3.1.7) Country/Area & River basin

Spain

☑ Other, please specify **:**Nervion river

(9.3.1.8) Latitude

43.034558

(9.3.1.9) Longitude

-3.003234

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

11.7

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0.4

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

11.2

(9.3.1.27) Total water consumption at this facility (megaliters)

11.7

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

ACERALAVA - ACVA is one of the plants located in Spain where a water scarcity risk has been identified with an impact on manufacturing (tons produced) and economic (impact on sales). ACERALAVA depends on surface water (Nervión riverbed) as a recipient of its effluents as well as to obtain water for its operations. The surface cooling of the ingots (martensitic steels) is carried out with a water bath, which is taken from the Nervión river. This cooling is carried out in a tank (martensitic cooling box). The water generated contains scale, which is decanted before discharge into the river. This would be the only industrial water discharge for which a specific authorization is available. At Aceralava all discharges to the river are within the limits of the Environmental Impact Authorization.

Row 2

(9.3.1.1) Facility reference number

Select from:

☑ Facility 2

(9.3.1.2) Facility name (optional)

SCHOELLER BLECKMANN EDELSTAHLROHR, GmbH

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals only

(9.3.1.6) Reason for no withdrawals and/or discharges

Our current methology only considers consumption (from municipal and surface water)

(9.3.1.7) Country/Area & River basin

Austria

☑ Other, please specify **:**Schwarza River

(9.3.1.8) Latitude

47.711468

(9.3.1.9) Longitude

16.038525

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

1196.2

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

1185.9

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

10.2

(9.3.1.27) Total water consumption at this facility (megaliters)

10.3

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

SBER-Ternitz has a high dependence on water consumption for the industrial processes carried out at the plant. Water is used in a closed circuit of water extracted from the aquifer (Schoeller-Bleckmann Technisches Service GmbH (Gemeindewasserleitungs-verband Ternitz und Umgebung)). Total consumption is 1196244 m3.

While the drought index in the area is 1.5 WWFA significant portion of production facilities produce wastewater as part of the manufacturing process. as part of the manufacturing process. Depending on the type, the wastewater is treated and treated and then discharged into the Schwarza.

Row 3

(9.3.1.1) Facility reference number

Select from:

☑ Facility 3

(9.3.1.2) Facility name (optional)

TUBACEX TUBOS INOXIDABLES, S.A.U.

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals only

(9.3.1.6) Reason for no withdrawals and/or discharges

Our current methology only considers consumption (from municipal and surface water)

(9.3.1.7) Country/Area & River basin

Spain

☑ Other, please specify :Nervion River

(9.3.1.8) Latitude

43.037083

(9.3.1.9) Longitude

-3.000199

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

221.6

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

89.1

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

132.4

(9.3.1.27) Total water consumption at this facility (megaliters)

221.5

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

TTI is one of the plants located in Spain where a water scarcity risk has been identified with an impact on manufacturing (tons produced) and economic (impact on sales). TTI-Amurrio makes intensive use of water for several of its industrial activities. The drought risk index in the area is low (2.3-WWF) and the average annual rainfall is 1,200 mm. The ecosystemic conditions of the area, typical of a Cantabrian mixed forest, do not present a high risk of drought. Clean rainwater: it is collected over the entire surface of the factory and is conducted to the river. The effluents generated are not discharged, so the incidence of polluting water discharges could only occur in the event of a discharge into a body of water. Water quality in Amurrio has a high pollution score (4-WWF). The Nervión River has been historically degraded due to the existence of urban-industrial discharges that make it more susceptible to damage by polluted effluents as well as a reduced capacity to buffer polluting pressures. A loss of containment of water with the presence of oils, acids or other toxic substances from manufacturing would flow into the Nervión River with the potential for an ecological catastrophe with an increase in potential systemic ecological risk. TTI Llodio discharges to a collector and from there to the river (the water treatment plant will be operating at the beginning of 2026). In TTI Amurrio there is no discharge of industrial water into the river.

Row 5

(9.3.1.1) Facility reference number

Select from:

☑ Facility 4

(9.3.1.2) Facility name (optional)

IBF, S.p.A.

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals only

(9.3.1.6) Reason for no withdrawals and/or discharges

Our current methology only considers consumption (from municipal and surface water)

(9.3.1.7) Country/Area & River basin

Italy

☑ Other, please specify :Trebbia river

(9.3.1.8) Latitude

45.057654

(9.3.1.9) Longitude

9.624642

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

34.4

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

30.99

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0.5

(9.3.1.20) Withdrawals from third party sources

3.5

(9.3.1.27) Total water consumption at this facility (megaliters)

3.5

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

The quality of the aquifers and surface water bodies is considered, on the whole, to be good. The monitoring of the Trebbia river, on the other hand, shows that the quality remains high along the entire stretch. However, very high water quality risk note (5- WWF) in Piacenza. A significant surface water body located less than 250 m from the site and hydrogeologically downstream of the site or located more than 250 m from the site but receiving discharges from the site is present. For the IBF2 plant, the nature/quantity of these discharges does not generate particular impacts on the consortium's wastewater treatment plant.

Row 6

(9.3.1.1) Facility reference number

Select from:

☑ Facility 5

(9.3.1.2) Facility name (optional)

TUBACEX TUBES AND PIPES PVT LTD

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals only

(9.3.1.6) Reason for no withdrawals and/or discharges

Our current methology only considers consumption (from municipal and surface water)

(9.3.1.7) Country/Area & River basin

India

☑ Other, please specify **:**Termora River

(9.3.1.8) Latitude

20.180636

(9.3.1.9) Longitude

72.776618

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

23.3

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

23.3

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.27) Total water consumption at this facility (megaliters)

23.3

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:
☑ About the same

(9.3.1.29) Please explain

High dependence on aquifer for water consumption. The risk of drought in the location of its plant is low (2.3-WWF).

Row 8

(9.3.1.1) Facility reference number

Select from:
☑ Facility 6

(9.3.1.2) Facility name (optional)

NTS MIDDLE EAST, FZCO

(9.3.1.3) Value chain stage

Select from:
☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals only

(9.3.1.6) Reason for no withdrawals and/or discharges

Our current methology only considers consumption (from municipal and surface water)

(9.3.1.7) Country/Area & River basin

United Arab Emirates

☑ Other, please specify **:**NA

(9.3.1.8) Latitude

24.968791

(9.3.1.9) Longitude

55.074109

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

2.2

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

2.2

(9.3.1.27) Total water consumption at this facility (megaliters)

2.2

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

Although there is a high risk of drought in the site area (4.3-WWF), there are no processes that use a large volume of water, mainly for domestic use.

Row 9

(9.3.1.1) Facility reference number

Select from:

☑ Facility 7

(9.3.1.2) Facility name (optional)

NTS SAUDI, LLC

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals only

(9.3.1.6) Reason for no withdrawals and/or discharges

Our current methology only considers consumption (from municipal and surface water)

(9.3.1.7) Country/Area & River basin

Saudi Arabia

☑ Other, please specify **:**NA

(9.3.1.8) Latitude

26.240502

(9.3.1.9) Longitude

49.986436

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

2.5

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

2.5

(9.3.1.27) Total water consumption at this facility (megaliters)

2.5

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

High drought risk zone (4.4-WWF). However, water consumption is limited (2,525 m3-Total) using water tanks. The site is located in a high water quality risk zone (5-WWF), however there is no effluent production into water bodies.

Row 10

(9.3.1.1) Facility reference number

Select from:

☑ Facility 8

(9.3.1.2) Facility name (optional)

SALEM TUBE, INC

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals only

(9.3.1.6) Reason for no withdrawals and/or discharges

Our current methology only considers consumption (from municipal and surface water)

(9.3.1.7) Country/Area & River basin

United States of America

☑ Other, please specify :NA

(9.3.1.8) Latitude

41.35583

(9.3.1.9) Longitude

-80.409703

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

8.3

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

8

(9.3.1.27) Total water consumption at this facility (megaliters)

8.4

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

The manufacture of high quality stainless steel and nickel alloy tubular products makes use of water in processes such as cold rolling, degreasing, bright annealing and heat treatment for the production of products such as mechanical tubing, bars and billets, special components, instrument tubing, hydraulic tubing, aerospace, heat exchanger tubing... Therefore, they depend as an essential ecosystem service in aquifer recharge. Low drought risk (2-WWF)

Row 11

(9.3.1.1) Facility reference number

Select from:

☑ Facility 9

(9.3.1.2) Facility name (optional)

TUBACEX DURANT, INC

(9.3.1.3) Value chain stage

Select from:

☑ Direct operations

(9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☑ Dependencies

☑ Impacts

☑ Risks

☑ Opportunities

(9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☑ Yes, withdrawals only

(9.3.1.6) Reason for no withdrawals and/or discharges

Our current methology only considers consumption (from municipal and surface water)

(9.3.1.7) Country/Area & River basin

United States of America

☑ Other, please specify **:**NA

(9.3.1.8) Latitude

33.967799

(9.3.1.9) Longitude

-96.369406

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

2.1

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ About the same

(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.18) Withdrawals from groundwater - non-renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

2.1

(9.3.1.27) Total water consumption at this facility (megaliters)

2.1

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

The manufacture of high quality stainless steel and nickel alloy tubular products makes use of water in processes such as cold rolling, degreasing, bright annealing and heat treatment for the production of products such as mechanical tubing, bars and billets, special components, instrument tubing, hydraulic tubing, aerospace, heat exchanger tubing... Therefore, they depend as an essential ecosystem service in aquifer recharge. Low drought risk (1,5- WWF)
[Add row]

(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?

Water withdrawals – total volumes

(9.3.2.1) % verified

Select from:

☑ 1-25

(9.3.2.2) Verification standard used

ISAE 3000

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:
☑ 1-25

(9.3.2.2) Verification standard used

ISAE 3000

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:
☑ Not verified

(9.3.2.3) Please explain

Not verified since it is not included in our reporting.

Water discharges – total volumes

(9.3.2.1) % verified

Select from:
☑ Not verified

(9.3.2.3) Please explain

Not verified since it is not included in our reporting.

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☑ Not verified

(9.3.2.3) Please explain

Not verified since it is not included in our reporting.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☑ Not verified

(9.3.2.3) Please explain

Not verified since it is not included in our reporting.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☑ Not verified

(9.3.2.3) Please explain

Not verified since it is not included in our reporting.

Water consumption – total volume

(9.3.2.1) % verified

Select from:

☑ 1-25

(9.3.2.2) Verification standard used

ISAE 3000
[Fixed row]

(9.4) Could any of your facilities reported in 9.3.1 have an impact on a requesting CDP supply chain member?

Select from:

☑ No, CDP supply chain members do not buy goods or services from facilities listed in 9.3.1

(9.5) Provide a figure for your organization’s total water withdrawal efficiency.

(9.5.1) Revenue (currency)

852400000

(9.5.2) Total water withdrawal efficiency

562306.22

(9.5.3) Anticipated forward trend

Reduction of the water consumption intensity is a key indicador in our ESG Plan, through water efficiency projects and a positive financial perspectives.
[Fixed row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

(9.13.1) Products contain hazardous substances

Select from:

☑ No

(9.13.2) Comment

Our products do not contain substances classified as hazardous although hazardous substances are used for manufacturing within the limits, complying with best available techniques.
[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

	Products and/or services classified as low water impact	Primary reason for not classifying any of your current products and/or services as low water impact	Please explain
	Select from: ☑ No, but we plan to address this within the next two years	*Select from:* ☑ Important but not an immediate business priority	*Our current priority is classifying productos and services as low carbon.*

[Fixed row]

(9.15) Do you have any water-related targets?

Select from:

☑ Yes

(9.15.1) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

Water pollution

(9.15.1.1) Target set in this category

Select from:

☑ No, but we plan to within the next two years

(9.15.1.2) Please explain

We are aware of the importance or managing our water resources because of the impact in our production processes. We are in a process to classify our water withdrawals and discharges to be able to measure our hidric footprint in a near future.

Water withdrawals

(9.15.1.1) Target set in this category

Select from:

☑ No, but we plan to within the next two years

(9.15.1.2) Please explain

We are aware of the importance or managing our water resources because of the impact in our production processes. We are in a process to classify our water withdrawals and discharges to be able to measure our hidric footprint in a near future.

Water, Sanitation, and Hygiene (WASH) services

(9.15.1.1) Target set in this category

Select from:

☑ Yes

Other

(9.15.1.1) Target set in this category

Select from:

☑ Yes

[Fixed row]

(9.15.2) Provide details of your water-related targets and the progress made.

Row 1

(9.15.2.1) Target reference number

Select from:
☑ Target 1

(9.15.2.2) Target coverage

Select from:
☑ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Water, Sanitation, and Hygiene (WASH) services
☑ Increase in the proportion of local population using safely managed sanitation services, including a hand-washing facility with soap and water around our facilities and operations

(9.15.2.4) Date target was set

03/30/2024

(9.15.2.5) End date of base year

12/30/2023

(9.15.2.6) Base year figure

0

(9.15.2.7) End date of target year

03/30/2026

(9.15.2.8) Target year figure

6000

(9.15.2.9) Reporting year figure

0

(9.15.2.10) Target status in reporting year

Select from:

☑ New

(9.15.2.11) % of target achieved relative to base year

0

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ Sustainable Development Goal 6

(9.15.2.13) Explain target coverage and identify any exclusions

This project was launched on March 31, 2024 in collaboration with UNICEF with a scope limited to the investment made by the Tubacex Foundation.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

This project was launched on March 31, 2024 in collaboration with UNICEF with the specific objective of: Improve educational facilities (25 schools) Improve climate resilience with the installation of solar panels to power water systems Educate and raise awareness on water use, sanitation and hygiene.

(9.15.2.16) Further details of target

Target has been established by the end of the program (3 years) considering the situation of access to water and literacy in Guyana and Suriname and the program's objective of promoting enabling environments for learning.

Row 2

(9.15.2.1) Target reference number

Select from:

☑ Target 2

(9.15.2.2) Target coverage

Select from:

☑ Organization-wide (direct operations only)

(9.15.2.3) Category of target & Quantitative metric

Monitoring of water use

☑ Increase in the proportion of sites monitoring water consumption total volumes

(9.15.2.4) Date target was set

12/30/2022

(9.15.2.5) End date of base year

12/30/2022

(9.15.2.6) Base year figure

26.2

(9.15.2.7) End date of target year

12/30/2030

(9.15.2.8) Target year figure

1.8

(9.15.2.9) Reporting year figure

0.99

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved

(9.15.2.11) % of target achieved relative to base year

103

(9.15.2.12) Global environmental treaties/initiatives/ frameworks aligned with or supported by this target

Select all that apply

☑ None, alignment not assessed

(9.15.2.13) Explain target coverage and identify any exclusions

As part of the company's sustainability plan, TUBACEX incorporated specific actions related to water consumption. Firstly, it consolidated the measurement of consumption at all its plants to establish reduction targets and move from an intensity over gross value added of 2.2 to 1.8 (the base year being 2029 and the target year 2030). We are currently redefining the measurement methodology.

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

The first step is to promote the measurement of all water-related indicators to support decision making. As part of our environmental policy, we advocate the responsible use of water and, to this end, we promote measures that favor the sustainable management of water resources, balancing the assurance of supply to meet human needs, the maintenance of healthy ecosystems and the contribution to economic development.

(9.15.2.16) Further details of target

This target was set in 2022, considering 2019 as base year, and it is focused on improving water consumption over value added (Euros).
[Add row]

C11. Environmental performance - Biodiversity

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
	Select from: ☑ Yes, we use indicators	*Select all that apply* ☑ Other, please specify :Report type

[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: ☑ Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

Governance

☑ Environmental policies

(13.1.1.3) Verification/assurance standard

General standards

☑ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

Our third-party verification process includes a thorough assessment of the Non-Financial Information Statement (EINF). Conducted annually, this verification ensures the integrity of the information related to our direct operations. We provide reasonable assurance regarding the accuracy of the reported data, aligning with industry standards and regulatory requirements. While certain upstream supplier data may be excluded due to difficulties in obtaining complete information, the verification of the EINF reinforces our commitment to transparency and accountability in our environmental performance.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

2023-Sustainability-Report (1).pdf

Row 3

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Water

(13.1.1.2) Disclosure module and data verified and/or assured

Governance

☑ Environmental policies

(13.1.1.3) Verification/assurance standard

General standards

☑ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

Our third-party verification process includes a thorough assessment of the Non-Financial Information Statement (EINF). Conducted annually, this verification ensures the integrity of the information related to our direct operations. We provide reasonable assurance regarding the accuracy of the reported data, aligning with industry standards and regulatory requirements. While certain upstream supplier data may be excluded due to difficulties in obtaining complete information, the verification of the EINF reinforces our commitment to transparency and accountability in our environmental performance.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

2023-Sustainability-Report (1).pdf

Row 4

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

☑ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Climate change

☑ Electricity/Steam/Heat/Cooling consumption

☑ Fuel consumption

☑ Waste data

(13.1.1.3) Verification/assurance standard

General standards

☑ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

Our third-party verification process includes a thorough assessment of the Non-Financial Information Statement (EINF). Conducted annually, this verification ensures the integrity of the information related to our direct operations. We provide reasonable assurance regarding the accuracy of the reported data, aligning with industry standards and regulatory requirements. While certain upstream supplier data may be excluded due to difficulties in obtaining complete information, the verification of the EINF reinforces our commitment to transparency and accountability in our environmental performance.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

2023-Sustainability-Report (1).pdf
[Add row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Sustainability Director

(13.3.2) Corresponding job category

Select from:
☑ Environment/Sustainability manager
[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:
☑ Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute