Tubacex

2025 CDP Corporate Questionnaire 2025

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.
Read full terms of disclosure

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12/15/2025, 10:03 am

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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 global leader in the design, manufacturing and supply of advanced industrial tubular solutions in stainless steel and high-nickel alloys, with a strong focus on innovation and value-added services for the energy and mobility sectors. Founded in 1963 and headquartered in Spain, it is the world's largest producer of seamless stainless-steel tubes and one of the few companies with a fully integrated production model—from steelmaking to final product delivery and service. With over 2,700 employees worldwide, TUBACEX operates 24 production facilities across Spain, Austria, the USA, Italy, India, Thailand, Saudi Arabia, Norway, Canada, Singapore, the UAE, Guyana and Kazakhstan, supported by a global distribution network through TUBACEX Service Solutions (TSS) and commercial presence in more than 38 countries. Its client portfolio spans critical industries including oil and gas, petrochemical, chemical, low-carbon energy, hydrogen, carbon capture and storage (CCS), aerospace, food processing, water desalination, electronics, and capital goods. TUBACEX's strategic plan, known as NT2 (New Tubacex in the Next Transition), extends through 2027 and is anchored on four pillars: sustainability and energy transition, financial strength, diversification and reduced dependence on Oil & Gas, and operational competitiveness. Through this plan, the company is expanding its offering of solutions for the hydrogen value chain, CCS technologies, and renewables while committing to reduce its Oil & Gas business to less than one-third of its portfolio. Its integrated structure includes several specialized entities: • TTI (TUBACEX TUBOS INOXIDABLES, S.A.U.): Produces seamless stainless steel and high-nickel alloy tubes. • ACERALAVA: Stainless steel mill supplying billets and bars for strategic sectors. • SALEM TUBE INC. and TUBACEX DURANT: U.S.-based production hubs for cold-drawn and coiled tubing. • SBER (Schoeller-Bleckmann Edelstahlrohr GmbH): Austrian facility producing hot-finished and umbilical tubes. • IBF S.p.A.: Italian plant producing large-dimension fittings

and tubes in high-alloy stainless steels. • TUBACEX TUPES & PIPES (India): Supplier of long-length and U-shape cold-finished tubes. • AWAJI Stainless (Thailand): Specializes in stainless steel accessories. • TTA (TUBACEX Taylor Accesorios): Spanish plant manufacturing seamless butt-welding fittings. • TUBACOAT: Develops customized advanced coatings for steel and nickel alloy products. • TUBACEX SERVICES: Offers tailored industrial service solutions. • TUBACEX UPSTREAM TECHNOLOGIES: Focuses on the manufacture and maintenance of machined components for the upstream Oil & Gas sector. • NTS Amega Global: Provides precision manufacturing, rental, and repair solutions across 11 international locations, enhancing Tubacex's upstream capabilities. With a strong commitment to sustainability, Tubacex has received validation from the Science Based Targets initiative (SBTi) in 2024 for its decarbonization targets and aims to reach net-zero emissions by 2050. The company is also advancing in circular economy practices and has integrated ESG metrics into its incentive schemes, further aligning its operations with the goals of the European Green Deal and global climate ambitions.
[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

12/29/2024

(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:
☑ 5 years

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

Select from:

☑ 5 years

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

Select from:
☑ 5 years
[Fixed row]

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

767541000

(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
☑ Italy
☑ Spain
☑ Brazil
☑ Canada
☑ Singapore
☑ Kazakhstan
☑ Saudi Arabia
☑ United Arab Emirates
☑ France
☑ Guyana
☑ Norway
☑ Austria
☑ Thailand

☑ United States of America

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

	Are you able to provide geolocation data for your facilities?	Comment
	Select from: ☑ Yes, for all facilities	*Tubacex can provide geolocation data for its 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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 2

(1.8.1.1) Identifier

IBF-FITTINGS DIVISION

(1.8.1.2) Latitude

45.493568

(1.8.1.3) Longitude

9.62647

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 3

(1.8.1.1) Identifier

IBF-PIPES DIVISION

(1.8.1.2) Latitude

45.493568

(1.8.1.3) Longitude

8.951819

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 4

(1.8.1.1) Identifier

NTS - BROUSSARD

(1.8.1.2) Latitude

30.164806

(1.8.1.3) Longitude

-91.975412

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 5

(1.8.1.1) Identifier

NTS - HOUSTON

(1.8.1.2) Latitude

29.98812

(1.8.1.3) Longitude

-95.37539

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 6

(1.8.1.1) Identifier

NTS - ODESSA

(1.8.1.2) Latitude

31.87

(1.8.1.3) Longitude

-102.26

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 7

(1.8.1.1) Identifier

TUBACEX DURANT, INC

(1.8.1.2) Latitude

33.967799

(1.8.1.3) Longitude

-96.369406

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 8

(1.8.1.1) Identifier

NTS Amega - UAE

(1.8.1.2) Latitude

24.968676

(1.8.1.3) Longitude

55.07381

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 14

(1.8.1.1) Identifier

NTS SAUDI, LLC

(1.8.1.2) Latitude

26.240502

(1.8.1.3) Longitude

49.986436

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 15

(1.8.1.1) Identifier

PROMET, AS

(1.8.1.2) Latitude

58.933371

(1.8.1.3) Longitude

5.603808

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 16

(1.8.1.1) Identifier

SALEM TUBE, INC

(1.8.1.2) Latitude

41.35583

(1.8.1.3) Longitude

-80.409703

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 19

(1.8.1.1) Identifier

TSS NORWAY, AS

(1.8.1.2) Latitude

58.893236

(1.8.1.3) Longitude

5.738555

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 20

(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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 23

(1.8.1.1) Identifier

TUBACEX IBF KAZAKHSTAN

(1.8.1.2) Latitude

47.104282

(1.8.1.3) Longitude

51.914328

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

Row 24

(1.8.1.1) Identifier

TUBACEX INNOVACIÓN, SL

(1.8.1.2) Latitude

43.298259

(1.8.1.3) Longitude

-2.870967

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.

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

(1.8.1.4) Comment

Tubacex has carried out a comprehensive mapping and monitoring process of its main facilities and geolocations, identifying critical operational sites across its global footprint. This effort enables the company to better assess environmental and social risks, ensure regulatory compliance, and support decision-making in areas such as sustainability, logistics, and resource management.
[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

Tubacex has continued to advance in its value chain mapping through a structured four-step process that includes: 1. Internal coordination: Identification of responsible people within the company, capable of mapping both purchasing and sales flows while prioritizing key categories and counterparties. 2. Profiling of entities: Assessment of the nature, size, and geographical location of value chain actors, across upstream and downstream stages. 3. High-impact categories: In the upstream segment, purchasing categories with the greatest impact on total procurement volume were selected for deeper analysis. 4.Sales and distribution model: On the downstream side, the focus was placed on sales channels and product routes within a globalized service and logistics network. In 2024, the mapping process was further reinforced with the integration of: • A due diligence framework aligned with OECD guidelines, incorporating human rights assessments across all locations. • A continuous supplier monitoring system (Go Supply) with over 100 ESG checkpoints and regular engagement with critical suppliers. • Inclusion of local community impact identification, especially in potentially vulnerable territories, supported by the Tubacex Foundation. • A materiality-based methodology for identifying and evaluating significant impacts, risks, and opportunities (IROs) in the value chain. This mapping approach covers Tier 1 suppliers and key downstream clients, and considers Tier 2–3 suppliers through indirect influence and surveillance tools. The findings are being used to inform mitigation strategies and the design of effective engagement with stakeholders across geographies.

[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?

(1.24.1.1) Plastics mapping

Select from:

☑ No, but we plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

☑ Judged to be unimportant or not relevant

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

Our core business is the manufacturing of steel-based seamless tubes and components. Plastics are not produced or used in our direct operations, and their presence in our upstream or downstream value chain is minimal and non-material. Our circular economy and resource efficiency strategies are entirely focused on steel and high-nickel alloys, not polymers. Tubacex is not currently prioritizing mapping plastics but continues to monitor waste streams to ensure full regulatory compliance.
[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

Tubacex links its time horizons directly with its strategic, ESG, and financial planning. In the short term (2024–2030), the company's roadmap aligns with its validated SBTi targets (64.32% reduction in scope 1+2 and 55.40% in scope 3 per value added by 2030), and with its NT2 Strategic Plan (2023–2027), which is built around sustainability, profitability, and competitiveness. Medium-term horizons (2031–2040) align with transition goals from the UN Agenda 2030 and intermediate milestones toward climate neutrality. Long-term planning (2041–2050 and beyond) incorporates adaptation to physical climate risks such as heatwaves and water stress, evaluated using IPCC scenarios (SSP2-4.5, SSP3-7.0, SSP5-8.5). These timeframes are also used in financial risk analysis, where short-term impacts (e.g., CBAM, EU ETS II, energy costs) are monetized to inform investment and operational decisions. The integration of these climate-linked horizons ensures consistent and informed strategic planning.

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 period aligns with the final phase of Agenda 2030 and marks a transition window for industrial electrification and regulatory adaptation.Tubacex monitors transition risks and ESG trends to position for long-term competitiveness.

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. Strategic and financial planning considers IPCC scenarios (SSP2-4.5, 7.0, 8.5) to ensure operational resilience and climate neutrality.
[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:

☑ No

(2.2.2.16) Further details of process

Tubacex's approach to identifying, assessing, and managing climate-related environmental dependencies, risks, impacts, and opportunities is comprehensive and structured across several critical phases. We begin by identifying 43 significant operational sites, including our steelmaking facility, seamless tube production plants, distribution centers, warehouses, and corporate offices. These locations were selected through a detailed materiality analysis using indicators such as personnel headcount, revenue contribution, production volumes, energy and water consumption, and waste generation. This analysis led to the prioritization of 9 material plants that require special attention due to their potential exposure to climate-related impacts and their strategic importance to business continuity. Our physical climate risk assessment is based on the IPCC Sixth Assessment Report (AR6), particularly the Shared Socioeconomic Pathways (SSPs), namely SSP2-4.5, SSP3-7.0, and SSP5-8.5. These scenarios allow us to model the evolution of acute and chronic physical hazards—such as extreme heat, drought, floods, wildfires, and water stress—under various future climate conditions. For each material site, we calculate physical risk using a structured formula that accounts for threat, exposure, and vulnerability, with vulnerability defined as sensitivity over adaptive capacity. In parallel, Tubacex assesses transition risks and opportunities using scenario-based analysis from the International Energy Agency (IEA), while integrating European and national policy developments including the European Green Deal, Fit for 55, REPowerEU, and the EU Emissions Trading System (ETS). This ensures that the company remains aware of regulatory tightening, carbon pricing mechanisms, and technological changes relevant to its operating environment. Risks and opportunities are evaluated both qualitatively and quantitatively. Transition risks are assessed using the likelihood–impact matrix, while opportunities are measured using a scoring methodology that reflects both Tubacex's ability to capitalize on the opportunity and its potential business value. The process also monetizes selected risks—such as the CBAM impact on the steel division and ETS cost increases—to support

informed decision-making in strategic and financial planning. All findings from this environmental risk assessment process are embedded into Tubacex's Corporate General Risk Control Policy, which is certified under ISO 31000. The company applies a three-line governance model, where risks are reviewed by Internal Audit, the Risk and Compliance Function, and ultimately by the Board of Directors, through its Audit and Sustainability Committees. This integrated, location-specific, and forward-looking methodology enables Tubacex to proactively identify climate vulnerabilities, anticipate regulatory shifts, and reinforce resilience, thereby aligning its climate strategy with long-term business continuity and global climate goals.

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 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

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

☑ Scenario analysis

(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 follows a structured process, aligned with TNFD and LEAP methodology, to identify, assess and manage environmental dependencies, impacts, risks and opportunities, focusing on water. The process begins with an initial screening under the "Evaluate" phase of LEAP, identifying the company's dependencies on water-related ecosystem services, such as water supply, flow regulation, precipitation patterns and water quality, and the associated impacts on both operations and ecosystems. This screening informs the subsequent risk assessment, which is conducted under various climate scenarios and temporal horizons. Risks are analyzed using a combination of threat, exposure, sensitivity and adaptive capacity. Threats—including water scarcity, flooding, and water quality, are quantified using climate projections and the WWF Water Risk Filter (scale 1–5). Exposure incorporates plant-specific factors such as production volume, revenue, personnel and water use. Sensitivity is evaluated qualitatively, reflecting the susceptibility of both the company and aquatic ecosystems to operational pressures and dependencies, while vulnerability is derived by comparing sensitivity to adaptive capacity. Inherent and residual risks are determined by cross-referencing these variables. Opportunities are assessed based on Tubacex's capacity to act and the effectiveness of the opportunity, considering temporal horizons and potential impact. To identify Tubacex's material sites, physical locations and specific sites with significant sustainability impacts were analyzed. A total of 43 sites were assessed, including the steel plant, production facilities, distribution centers, warehouses and corporate offices. Of these, 23 sites were considered material for the analysis of water-related risks and opportunities. The methodology follows the TNFD recommendations and the LEAP framework (Locate, Evaluate, Assess, Prepare). In the first phase, "LOCATE," the materiality of Tubacex activities was defined in relation to its sector using the GICS (Global Industry Classification Standard) via the Encore tool. The ecological context of each location was then analyzed by identifying study sites and using bibliographic resources and appropriate tools to determine their environmental status through selected indicators. Tubacex made use of key tools such as the WWF Water Risk Filter, Aqueduct and ICCA for the identification of sensitive areas. Sensitive areas were determined following TNFD criteria, including areas of high physical water stress, which directly influence the company's water risk management and planning.

[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 conducts a comprehensive assessment of environmental risks and opportunities that explicitly considers the interconnections between environmental dependencies, impacts, risks, and opportunities. In 2024, this process was strengthened through the adoption of the TNFD-aligned LEAP methodology, which allows for a contextual and integrated analysis across 43 operational sites. The company recognizes the cross-cutting nature of issues such as water, climate, biodiversity, and pollution. For example, water scarcity is not only an operational risk but also linked to ecosystem degradation and reputational concerns. Common tools, such as the WWF Risk Filters, are applied across topics to evaluate exposure, sensitivity, and adaptive capacity, enabling consistent risk prioritization. This integrated approach ensures that Tubacex captures cascading and systemic risks that may arise from interconnected environmental factors. Climate change impacts, for instance, are assessed for their direct and indirect effects on biodiversity and water resources, while transition risks like competition for natural resources are viewed through both environmental and stakeholder lenses. Interdependencies are factored into the company's corporate risk management model, supporting more resilient and coordinated responses across business units. This framework allows Tubacex to anticipate and manage cumulative pressures on natural resources, contributing to long-term sustainability and strategic alignment with global ESG expectations.
[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 uses both qualitative and quantitative approaches. A substantial transition risk is defined as one that meets several cumulative thresholds: a high probability of occurrence (80%), an economic impact exceeding 5% of EBITDA, a requirement for intervention by the Board of Directors, significant damage to the Group's reputation or stock value, and irreversible environmental damage. For physical risks, Tubacex applies the IPCC formula: PHYSICAL RISK = THREAT × EXPOSURE × VULNERABILITY, where VULNERABILITY = SENSITIVITY / ADAPTIVE CAPACITY. The result of this calculation determines a prioritization score (in %) that reflects the degree of materiality. A substantial physical risk is considered to exist when this prioritization score is between 40% and 100%, indicating high or very high severity, with short-term occurrence expected.

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 define and assess substantial climate- and water-related opportunities, Tubacex employs a combination of qualitative and quantitative criteria that align with its strategic business goals. A substantial opportunity is one that the company can integrate or capitalize on within the current fiscal year, or that is already being implemented. These opportunities must demonstrate a significant impact on key areas such as operational efficiency, resource optimization, strategic resilience, and financial performance. Tubacex also considers how such opportunities may enhance its market positioning—particularly in emerging sectors like hydrogen and low-carbon technologies—and its reputation among stakeholders, including investors, customers, and regulators. The evaluation process takes into account the time horizon for the opportunity to materialize, the company's internal capacity to implement it effectively, and the broader context in which it operates. Tubacex places particular emphasis on initiatives that contribute to decarbonization, innovation in sustainable manufacturing, and circular economy models. By doing so, the company ensures that climate- and water-related opportunities are not only technically and economically viable but also capable of driving long-term value creation and strengthening its leadership in sustainable industrial solutions.
[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 apply a comprehensive and systematic approach to identifying and classifying potential water pollutants associated with our operations. This process is embedded within our ISO 14001-certified environmental management system and is aligned with both regulatory obligations and internal sustainability standards. The identification of pollutants begins with a detailed analysis of all substances used in production processes, taking into account their chemical composition, hazardous properties, and potential environmental impacts—particularly their potential to affect water bodies and aquatic ecosystems. Our environmental policy mandates regular evaluation of production inputs and outputs to detect pollutants such as heavy metals (notably nickel and chromium), as well as other chemical residues. We continuously monitor wastewater discharges through a set of key parameters, including pH, biochemical oxygen demand (BOD), and chemical oxygen demand (COD), to ensure that effluent quality remains within permitted environmental thresholds. This monitoring is conducted both internally and through periodic assessments by accredited external laboratories. The pollutants to be measured, the sampling methods, and the frequency of testing are explicitly defined in the Integrated Environmental Authorizations (AAI) applicable to each facility. These legal instruments form the backbone of our surveillance system, which allows us to detect early deviations and implement corrective measures before impacts materialize. Our facilities—such as TTI Amurrio, Aceralava, and Llodio—are subject to continuous environmental monitoring under this framework. We measure the effectiveness of our pollutant identification process through compliance tracking with regulatory limits, analysis of non-conformity events, and review of third-party sampling results. This structured and preventive approach enables Tubacex to manage water-related environmental risks proactively and ensure the protection of both ecosystems and human health.
[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

Waste industrial liquids include spent nitric acid, cutting fluids, and alkaline degreasing solutions. Spent nitric acid, from cleaning and passivation processes, contains residual nitrates and degraded acidic compounds, which can impact local water quality if not properly treated.

(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

Tubacex minimizes the adverse impacts of potential water pollutants through a multi-layered prevention and control strategy embedded within its ISO 14001-certified environmental management system. All emissions to water are managed under Integrated Environmental Authorizations (AAI), which specify thresholds, pollutant categories, and sampling frequencies. Wastewater monitoring is conducted regularly using direct measurements of key indicators such as pH, COD, BOD, nickel, chromium, and ammonia. Although current levels of nitrates and ammonia remain below the permitted thresholds, Tubacex has planned a significant upgrade: a new Water Treatment Plant (WTP) scheduled to become operational in 2026. This facility will enable advanced treatment of effluents to further reduce potential impacts on surface waters in Spain. In addition to routine compliance, Tubacex has implemented water recycling measures (e.g., recovery of rinse waters), sealed flooring in storage areas to prevent leaching, and closed-loop cooling systems across its operations to reduce discharge volumes. Preventive infrastructure, continuous environmental monitoring, and external validation by accredited bodies ensure early detection and rapid response to deviations. This approach not only guarantees legal compliance but also supports ecosystem protection and public health safeguarding in the long term.

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

Tubacex minimizes the adverse impacts of potential water pollutants through a multi-layered prevention and control strategy embedded within its ISO 14001-certified environmental management system. All emissions to water are managed under Integrated Environmental Authorizations (AAI), which specify thresholds, pollutant categories, and sampling frequencies. Wastewater monitoring is conducted regularly using direct measurements of key indicators such as pH, COD, BOD, nickel, chromium, and ammonia. Although current levels of nitrates and ammonia remain below the permitted thresholds, Tubacex has planned a significant upgrade: a new Water Treatment Plant (WTP) scheduled to become operational in 2026. This facility will enable advanced treatment of effluents to further reduce potential impacts on surface waters in Spain. In addition to routine compliance, Tubacex has implemented water recycling measures (e.g., recovery of rinse waters), sealed flooring in storage areas to prevent leaching, and closed-loop cooling systems across its operations to reduce discharge volumes. Preventive infrastructure, continuous environmental monitoring, and external validation by accredited bodies ensure early detection and rapid response to deviations. This approach not only guarantees legal compliance but also supports ecosystem protection and public health safeguarding in the long term.
[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

As of 2024, Tubacex conducted a comprehensive water risk assessment across 23 operational sites, identifying 4 locations as highly sensitive due to water stress, pollution risk, and reliance on ecosystem services. These sites were prioritized based on criteria aligned with the TNFD and WWF Water Risk Filter methodology. Although the current assessment focuses on direct operations, plans are in place to expand the scope to include upstream and downstream value chain risks by integrating water-related dependencies and transition impacts into our CSRD-aligned materiality process.

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

Plastics are not materially used in Tubacex's core operations or product value chain, as our industrial activity centers on the manufacturing of seamless stainless-steel tubes. Consequently, plastics-related environmental risks have not been identified as material at this time. While we do not currently conduct a dedicated plastic risk screening, we maintain environmental compliance protocols and waste management systems that capture incidental plastic use (e.g. in packaging or auxiliary materials). As part of our continuous improvement and circular economy strategy, we remain attentive to emerging regulations and stakeholder expectations regarding plastics.
[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 prolonged drought conditions represent a critical environmental risk that could materially affect operational continuity in the steel sector. Given the industry's reliance on water-intensive cooling systems, such scenarios may result in regulatory restrictions on industrial water use, directly challenging production stability. For Tubacex, the strategic implications include: • Operational Disruption: Reduced plant throughput stemming from constrained access to water or compliance with imposed usage limits. • Capital Expenditure Pressure: The need to accelerate investment in advanced water efficiency and recirculation technologies to safeguard production resilience and regulatory compliance. • Value Chain Vulnerability: Potential disruptions in the availability of finished products may affect service to key customers, with implications for portfolio retention and reputation.

(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 (especially for the ACERALAVA, TTI AMURRIO y TTI LLODIO facilities).

(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)

3230000

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

9700000

(3.1.1.25) Explanation of financial effect figure

Currently, Tubacex has not experienced any issues related to water scarcity. However, under high-emission climate scenarios (SSP5-8.5) in the short term Tubacex faces an elevated risk of water scarcity at critical operational sites — specifically, the ACERALAVA, TTI Amurrio, and TTI Llodio facilities. Projections indicate an increased frequency and intensity of drought events, which may trigger regulatory or physical constraints on industrial water use. To quantify potential financial exposure, a scenario analysis was conducted assuming a 10% reduction in allowable water consumption during the summer period (three months). This restriction would necessitate a proportional reduction in production output, thereby directly impacting revenue generation during the affected period. Based on this model, the estimated financial impact ranges between €4.8 million and €14.5 million.

(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

261000

(3.1.1.28) Explanation of cost calculation

The total cost figure reported includes both realized and planned CAPEX directly allocated to the implementation of water stewardship measures across Tubacex's global operations. For 2024, a total of €261,000 has already been executed, and a further €585,824 is budgeted through 2025. These costs were calculated based on actual project budgets and technical designs for: - Installation and automation of closed-circuit water reuse systems to reduce freshwater withdrawals. - Deployment of decantation and filtration units to increase reuse of process water. - Upgrade of cooling tower efficiency systems to lower evaporation and operational water intensity. - Design and engineering of advanced water treatment systems for high-risk facilities identified through the WWF Water Risk Filter and internal risk mapping. - Monitoring and sensor systems for real-time detection of leaks, anomalies, and water loss.

(3.1.1.29) Description of response

SITUATION Tubacex operates industrial facilities,such as ACERALAVA, TTI Amurrio and TTI Llodio, that are highly dependent on water) cooling and production processes). With increasing water stress and recurrent droughts in Spain, the company identified a growing environmental risk to production continuity due to potential water restrictions and decreased availability. TASK The company needed to develop and implement effective water management solutions to mitigate the operational and financial risks posed by water scarcity. The objective was to ensure uninterrupted production, regulatory compliance and alignment with its broader sustainability goals, particularly those related to water conservation. ACTION Tubacex implemented technical and organizational measures to improve water efficiency across its plants, sucha as: - Closed-loop systems for water reuse in production processes, adapted to the specific characteristics of each plant. - Automating cooling water circuits to optimize flow and minimize losses. - Deploying remote water meters with telemetry for accurate monitoring.. - Optimizing purge systems and reuse of neutralized wastewater at different stages of production. - Installing automatic shut-off systems and solenoid valves in cooling lines to avoid unnecessary discharge. - Developing energy and water saving plans, supported by constant monitoring of consumption data. - Implementing a water separation project aimed at improving the efficiency of wastewater treatment systems and optimizing reuse. RESULT The integrated measures led to improved control over water consumption and a significant enhancement in the company's resilience to potential drought-related disruptions. The total CAPEX investment in 2024 reached €261,000 supporting Tubacex's contribution to SDG 6 (Clean Water and Sanitation). In 2025, Tubacex plans to advance in the evaluation and management of its water consumption by calculating its water footprint, guided by ISO 14046.

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 prolonged drought conditions represent a critical environmental risk that could materially affect operational continuity in the steel sector. Given the industry's reliance on water-intensive cooling systems, such scenarios may result in regulatory restrictions on industrial water use, directly challenging production stability. For Tubacex, the strategic implications include: • Operational Disruption: Reduced plant throughput stemming from constrained access to water or compliance with imposed usage limits. • Capital Expenditure Pressure: The need to accelerate investment in advanced water efficiency and recirculation technologies to safeguard production resilience and regulatory compliance. • Value Chain Vulnerability: Potential disruptions in the availability of finished products may affect service to key customers, with implications for portfolio retention and reputation.

(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 (especially for the ACERALAVA, TTI AMURRIO y TTI LLODIO facilities).

(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)

3230000

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

9700000

(3.1.1.25) Explanation of financial effect figure

Currently, Tubacex has not experienced any issues related to water scarcity. However, under high-emission climate scenarios (SSP5-8.5) in the short term Tubacex faces an elevated risk of water scarcity at critical operational sites — specifically, the ACERALAVA, TTI Amurrio, and TTI Llodio facilities. Projections indicate an increased frequency and intensity of drought events, which may trigger regulatory or physical constraints on industrial water use. To quantify potential financial exposure, a scenario analysis was conducted, assuming a 10% reduction in allowable water consumption during the summer period (three months). This restriction would necessitate a proportional reduction in production output, thereby directly impacting revenue generation during the affected period. Based on this model, the estimated financial impact ranges between €4.8 million and €14.5 million.

(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

261000

(3.1.1.28) Explanation of cost calculation

The total cost figure reported includes both realized and planned CAPEX directly allocated to the implementation of water stewardship measures across Tubacex's global operations. For 2024, a total of €261,000 has already been executed, and a further €585,824 is budgeted through 2025. These costs were calculated based on actual project budgets and technical designs for: - Installation and automation of closed-circuit water reuse systems to reduce freshwater withdrawals. - Deployment of decantation and filtration units to increase reuse of process water. - Upgrade of cooling tower efficiency systems to lower evaporation and operational water intensity. - Design and engineering of advanced water treatment systems for high-risk facilities identified through the WWF Water Risk Filter and internal risk mapping. - Monitoring and sensor systems for real-time detection of leaks, anomalies, and water loss.

(3.1.1.29) Description of response

SITUATION Tubacex operates industrial facilities,such as ACERALAVA, TTI Amurrio and TTI Llodio, that are highly dependent on water) cooling and production processes). With increasing water stress and recurrent droughts in Spain, the company identified a growing environmental risk to production continuity due to potential water restrictions and decreased availability. TASK The company needed to develop and implement effective water management solutions to mitigate the operational and financial risks posed by water scarcity. The objective was to ensure uninterrupted production, regulatory compliance and alignment with its broader sustainability goals, particularly those related to water conservation. ACTION Tubacex implemented technical and organizational measures to improve water efficiency across its plants, sucha as: - Closed-loop systems for water reuse in production processes, adapted to the specific characteristics of each plant. - Automating cooling water circuits to optimize flow and minimize losses. - Deploying remote water meters with telemetry for accurate monitoring.. - Optimizing purge

systems and reuse of neutralized wastewater at different stages of production. - Installing automatic shut-off systems and solenoid valves in cooling lines to avoid unnecessary discharge. - Developing energy and water saving plans, supported by constant monitoring of consumption data. - Implementing a water separation project aimed at improving the efficiency of wastewater treatment systems and optimizing reuse. RESULT The integrated measures led to improved control over water consumption and a significant enhancement in the company's resilience to potential drought-related disruptions. The total CAPEX investment in 2024 reached €261,000 supporting Tubacex's contribution to SDG 6 (Clean Water and Sanitation). In 2025, Tubacex plans to advance in the evaluation and management of its water consumption by calculating its water footprint, guided by ISO 14046.

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 changing its electricity supply in 2020. However, increasing the percentage of green electricity continues to be a challenge in certain geographies where it operates. In some countries, such as India, the USA and the United Arab Emirates, difficulties are being encountered, as the plants purchase electricity according to the country's energy mix, with no possibility of modifying it. On the other hand, in certain European facilities, such as Italy (IBF), renewable electricity is

available, although its percentage is low (19.17%) compared to other countries where 100% renewable electricity PPAs are in place. This contributes to the Group's Scope 2 GHG emissions and may hinder the achievement of its decarbonization targets.

(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)

57000

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

114000

(3.1.1.25) Explanation of financial effect figure

Carbon pricing mechanisms may influence the cost of electricity consumed by Tubacex. In Europe, the implementation of EU ETS2, which regulates CO_2 emissions from fossil fuel use in sectors such as buildings and transport, is expected to increase the cost of energy from these sources, potentially affecting the final price of electricity purchased by Tubacex. Currently, there is no financial impact, as the mechanism is in a transitional phase. Starting in 2025, regulated entities must report 2024 emissions and onward. In 2027, obligations to surrender emission allowances begin. Consequently, the financial effect up to 2027 will be EUR 0. From 2027, an indirect impact is expected as higher electricity costs for Tubacex facilities in Europe that do not yet use 100% renewable energy, such as IBF Vittuone and Piacenza. EU ETS2 affects fossil fuel suppliers (regulated entities). Having to pay for carbon emissions may lead to additional costs, which could be passed on to electricity suppliers and ultimately consumers. However, uncertainty remains regarding the magnitude of this impact as it depends on market developments. The projected impact is estimated under two EUA2 price scenarios (emission allowances under EU ETS2), assuming: - During 2027–2030, both facilities achieve 50% green electricity (a conservative estimate). - Suppliers will pass 100% of the cost increase to Tubacex. - Two EUA2 price scenarios: rapid transport electrification, with EUA2 price around EUR 50, and slower electrification than Fit for 55 projections, with EUA2 price around EUR 100, resulting in cost increases of EUR 10/MWh and EUR 20/MWh, respectively. For 2027, the average total electricity consumption of 2022–2024 in both facilities was calculated at 3,806.67 MWh. Applying the 50% green electricity target estimates renewable and non-renewable consumption at 1,903.34 MWh each. Using projected price increases for non-renewable electricity, the additional cost for 2027–2030 is: - Rapid electrification: approx. EUR 57,000 (cumulative 2027–2030). - Slow electrification: approx. EUR 114,000 (cumulative 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

50000

(3.1.1.28) Explanation of cost calculation

The cost of responding to the risk is calculated based on the sum of the investments (CapEx) made in the reporting year for implementing initiatives to improve energy efficiency (and consequently reduce electricity consumption) at the Italy (IBF) facilities: Vittuone and Piacenza.

(3.1.1.29) Description of response

SITUATION In 2024, Tubacex identified that its Italian facilities, IBF Vittuone and Piacenza, were highly exposed to transition risks under the upcoming EU ETS II regulation. These plants still relied heavily on fossil-fuel-based electricity, with only 19.2% sourced from renewables. With EU ETS II obligations starting in 2027, fossil energy suppliers will need to surrender emission allowances, likely increasing electricity prices via carbon cost pass-throughs. This posed a financial and regulatory vulnerability for Tubacex's Italian operations. TASK Tubacex needed to mitigate this exposure to rising electricity costs and support its goal of sourcing 100% renewable electricity by 2025. The challenge was to implement short-term, cost-effective energy efficiency measures while laying the groundwork for medium-term renewable procurement. ACTION The risk response included actions to reduce electricity consumption, such as: - Replacing heating systems for production and office facilities. - Monitoring and controlling consumption of thermal treatment furnaces. - Installing variable frequency drives on main motors. These initiatives also involved facility retrofits, systems optimization, and early-stage work to install LED lighting and replace inefficient equipment at high-risk sites. They complemented Tubacex's renewable energy sourcing strategy, including PPAs planned for expansion in 2025. RESULT The 2024 initiatives reduced the electricity demand baseline and strengthened Tubacex's resilience against future regulatory cost increases. These actions align with its SBTi targets, contribute to SDGs 7 and 13, and reflect a clear, measurable financial commitment to managing transition risks under EU ETS II.

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, particularly the EU Emission Trading System (EU ETS), have growing implications for Tubacex's Acería de Álava (ACERALAVA) facility. Covered under the EU ETS, this site faces increased cost exposure from stricter regulations in Phase IV (2026–2030) and the phased implementation of the Carbon Border Adjustment Mechanism (CBAM). From 2024 to 2027, the total volume of emission allowances will fall by 4.3% annually, and by 4.4% from 2028 onward. CBAM will reduce free allocations for covered sectors like steel. If ACERALAVA maintains its current Scope 1 emissions, it will face a deficit by 2026: • Emissions: 28,266 tCO_2e • Free allowances: 17,705 tCO_2e • Deficit: 10,561 tCO_2e At a forecasted EUA price of €91.35/tCO_2 in 2026, the impact may reach €965,000, with annual costs from €540,000 to €2.1 million between 2026 and 2030. CBAM will phase out free allocations as follows: 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, 14% in 2033, and 0% from 2034. Tubacex is preparing for this long-term shift, where EUA purchases become a standard cost and decarbonization and energy efficiency upgrades at ACERALAVA are essential. These risks are classified as virtually certain in the short term and of medium-high magnitude.

(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)

431000

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

1950000

(3.1.1.25) Explanation of financial effect figure

Currently, Acería de Álava (ACVA) is subject to the EU ETS. In the short term, ACVA is expected to face increasing costs for purchasing allowances due to the reduction of free allocations with the entry into force of the CBAM (2026–2030). To estimate the projected short-term impact (up to 2030), it is assumed that there will be a deficit balance in ACVA's Scope 1 emissions compared to the minimum preliminary free allocations they would receive in that period. The cost of purchasing emission allowances has been estimated taking into account: projected ACVA emissions for the period (2026–2030); preliminary free allocations considering the CBAM reduction factors; and the estimated average EUA price for the same period. In this regard, ACVA's Scope 1 emissions in 2026 are projected to be approximately 22,776 tCO2e; the total free allocations for this facility would be around 17,705 tCO2e, resulting in a deficit balance of -5,071 tCO2e. On the other hand, in 2026 the EUA price is projected to be approximately EUR 85, according to expert forecasts. Multiplying this price by the emissions deficit, the financial impact in 2026 would be approximately EUR 431,000, representing the minimum range for the analyzed period. By 2030, ACVA's emissions will be lower, although free allocations will also decrease progressively, while the EUA price is projected to increase. Therefore, in 2030, if ACVA's emissions are approximately 22,776 tCO2e, free allocations are 9,352 tCO2e (balance: -13,424 tCO2e), and considering the EUA price at approximately EUR 145, the financial impact would be around EUR 1.95 million. It should be noted that this cost estimate does not consider the possible surplus carried over for this year. Additionally, both ACVA's annual emissions and EUA prices may fluctuate due to technological or market factors, so this estimate must 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

10260000

(3.1.1.28) Explanation of cost calculation

The cost of responding to the risk is approximately EUR 10.26 million, considering the total investments to implement various decarbonization initiatives at ACVA (both completed and planned). CapEx of measures implemented in the reporting year (2024): EUR 85,690 CapEx of measures planned for the period 2025: EUR 9,985,186 The differential OpEx of the initiatives is also included, that is, the additional costs incurred after implementing the initiatives.

(3.1.1.29) Description of response

SITUATION Acería de Álava (ACERALAVA) is one of Tubacex's most carbon-intensive facilities and is regulated under the EU ETS. With Phase IV (2026–2030) and the CBAM reducing free emissions allowances, the site faces rising operational costs from increased EUA purchases. Tubacex has prioritized decarbonization investments at ACERALAVA as part of its climate strategy. TASK Tubacex aims to reduce Scope 1 emissions at ACERALAVA by improving energy efficiency and upgrading industrial processes, lowering EUA exposure, ensuring CBAM compliance and supporting long-term climate resilience. ACTION The response includes measures to improve energy efficiency, highlighting furnace replacement and waste heat recovery. Participation in Spain's PERTE enables short-term decarbonization initiatives, focused mainly on optimizing energy efficiency in production processes. Planned and implemented actions include: -Installation of variable frequency drives on combustion motors in PIT and blooming furnaces. -Implementation of heat recovery systems to maximize energy utilization. -Replacement of PIT furnace burners with self-recovering models. -Incorporation of advanced control and automation systems for continuous energy efficiency improvement. -Flue gas analyzers for real-time emissions monitoring. -Automation upgrades for fans and filters. -Installation of a new ladle furnace to modernize steel refining. -Deployment of a STATCOM system to improve power stability. -EV charging infrastructure and low-carbon energy sourcing to reduce indirect emissions. RESULT These actions are expected to significantly reduce Scope 1 CO_2 emissions and minimize EUA purchases, mitigating financial risks under the EU ETS and CBAM. They also enhance process efficiency, modernization and advance Tubacex's SBTi-aligned climate goals and commitment to SDG 13 (Climate Action).

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 scheme, EU ETS II, was introduced, which will be fully implemented from 2027. This system will regulate CO2 emissions from fuel consumption used in buildings, road transport, and other sectors. Starting in 2028, regulated entities, including fuel suppliers for Tubacex's own vehicles or distributors, will have to report the average percentage of costs related to the delivery of emission allowances that were passed on to consumers during the previous year, providing greater transparency on the additional costs for the company. This system could have an indirect impact on freight transport costs for facilities in Europe, such as those in Austria and Italy and even in Spain (Amurrio and Llodio).

(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-low

(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)

145000

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

303000

(3.1.1.25) Explanation of financial effect figure

At present, there is no financial impact from this new mechanism, as it is in a transitional phase. Starting in 2025, regulated entities will have to report 2024 emissions and so on. In 2027, the obligations to surrender emission allowances will begin. Consequently, the current financial effect up to 2027 will be EUR 0. The projected financial effect has been estimated based on two EUA2 price scenarios (emission allowances under EU ETS2). The estimate is made under the following assumptions: i) It is assumed that diesel suppliers (fuel used by Tubacex Logistics trucks) will pass 100% of the cost increase on to the consumer (Tubacex). II) Two EUA2 price scenarios are considered: a rapid transport electrification scenario, where the EUA2 price is contained (around EUR 50) and a slower electrification

scenario than expected under Fit for 55, where the EUA2 price would be higher (EUR 100). This could result in an approximate increase of EUR 0.12/liter and EUR 0.25/liter, respectively. To obtain an annual reference value for 2027, fuel consumption per kilometer traveled by the trucks was estimated at approximately 0.4 l/km, translating to an annual consumption of approximately 403,836 liters. To calculate additional costs, these consumption values in liters are multiplied by the two price increases according to the ETS2 scenarios. Additional vehicle fuel consumption costs: - Rapid electrification scenario: increase of approx. EUR 145,000 (cumulative 2027–2030). - Slow electrification scenario: increase of approx. EUR 303,000 (cumulative 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

0

(3.1.1.28) Explanation of cost calculation

No specific actions have been taken to address the indirect cost transmission risk posed by EU ETS II in the transportation sector.

(3.1.1.29) Description of response

No specific actions have been taken to address the indirect cost transmission risk posed by EU ETS II in the transportation sector.
[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)

1500000

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

Select from:

☑ 1-10%

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

6465000

(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

Tubacex identifies water scarcity as a physical risk with a short-term impact (2020–2039), particularly in its Basque Country operations (Aceralava, Amurrio, and Llodio), where drought conditions and summer restrictions could limit water availability and reduce production output. To quantify the impact, a conservative scenario of a 10% drop in water availability over three months was modeled. In response, the company invested €261,000 in 2024 in water efficiency measures, including closed-loop systems, automated controls, and real-time monitoring, aimed at increasing resilience and mitigating potential operational disruptions. A further €585,824 has been budgeted for 2025. Regarding transition risks, Tubacex anticipates rising operating costs in the short term due to evolving climate policies. These include increased costs from EU ETS Phase IV and the gradual phase-out of free allowances under CBAM starting in 2026, higher energy prices from fossil-based electricity (notably in Italy), and transport cost pass-throughs linked to EU ETS II from 2027. The company's SBTi-validated climate targets and active decarbonization initiatives, including renewable electricity sourcing and increased circularity, are expected to mitigate these risks progressively.

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)

6465000

(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), particularly in Tubacex's industrial facilities located in the Basque Country—Aceralava, TTI Amurrio, and TTI Llodio—which are exposed to increasing drought conditions and seasonal water stress. These events could result in temporary restrictions on industrial water use, especially during the summer months, leading to reduced production volumes and revenue loss. To assess the financial impact, Tubacex modeled a conservative scenario involving a 10% reduction in water availability over a three-month period. While additional scenarios were evaluated, this one was selected to reflect a cautious view, especially as the company is already taking adaptation measures. In 2024, Tubacex invested €261,000 in water efficiency projects, including closed-loop systems, automated controls, and real-time monitoring technologies, aimed at increasing operational resilience and minimizing potential water-related disruptions. With respect to transition risks related to water, Tubacex conducted an analysis as part of its broader sustainability and climate risk assessment framework. This includes evaluating how regulatory changes, stakeholder expectations, and shifts in water pricing could affect future operating costs or investment decisions in water-intensive processes. The inclusion of water-related transition risks in the 2024 analysis reflects Tubacex's commitment to improving risk oversight in line with evolving climate disclosure standards.

[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

5

(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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

Row 5

(3.2.1) Country/Area & River basin

United Arab Emirates

☑ Other, please specify :N/A

(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:

☑ 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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

Row 6

(3.2.1) Country/Area & River basin

Saudi Arabia

☑ Other, please specify :N/A

(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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

Row 7

(3.2.1) Country/Area & River basin

United States of America

☑ Other, please specify :N/A

(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

6

(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:

☑ 11-20%

(3.2.11) Please explain

To identify its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

Row 8

(3.2.1) Country/Area & River basin

Singapore

☑ Other, please specify :N/A

(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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

Row 9

(3.2.1) Country/Area & River basin

Guyana

☑ Other, please specify :N/A

(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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

Row 10

(3.2.1) Country/Area & River basin

Norway

☑ Other, please specify :N/A

(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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

Row 11

(3.2.1) Country/Area & River basin

Thailand

☑ Other, please specify :N/A

(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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

Row 12

(3.2.1) Country/Area & River basin

Kazakhstan

☑ Other, please specify :N/A

(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 its material locations exposed to water-related risks, Tubacex assessed 23 physical sites across its operations. These include the steelmaking plant, production facilities, distribution centers, warehouses, and corporate offices—each representing locations where the company has significant environmental interaction. In line with the TNFD´s LEAP (Locate, Evaluate, Assess and Prepare) procedure, the methodology involved a contextual analysis of each site to assess its ecological setting and vulnerability to water-related impacts, dependencies, risks and opportunities. Prioritization of sites was based on two key criteria: their materiality for the business and their sensitivity to water-related risks. The ecological context was examined using bibliographic resources and geospatial tools to evaluate the status of nature and water systems in each area. For the analysis of water risk, the WWF Water Risk Filter was applied. Sensitive areas were identified based on TNFD-aligned indicators, including exposure to physical water risks such as droughts, floods, water quality degradation, and disruption of ecosystem services. Data from the Aqueduct platform (WWF/World Resources Institute), as well as factors like proximity to protected areas (e.g., Red Natura 2000) were utilized to support this assessment.

[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	Comment
	Select from: ☑ No	*Tubacex was subject to no fines, enforcement orders, and/or other penalties for water-related regulatory violations in 2024.*

[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

12/30/2023

(3.5.2.4) Period end date

12/29/2024

(3.5.2.5) Allowances allocated

20403

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

28266

(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 is currently regulated under the EU Emissions Trading Scheme (EU ETS) through a single installation: the Acería de Álava facility in Spain. The emissions covered include process-related and stationary combustion emissions. While the company still benefits from a limited volume of free allowances, it recognizes that these allocations will be progressively phased out by 2034, in accordance with the EU ETS reform and the implementation of the Carbon Border Adjustment Mechanism (CBAM). As part of its strategic response, TUBACEX has identified this phase-out as a material climate transition risk. The company is actively preparing through investments in technological innovation and emissions reduction measures, with the objective of minimizing exposure to future compliance costs and enhancing the sustainability of its operations.
[Fixed row]

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

Tubacex ensures regulatory compliance with the EU Emissions Trading System (EU ETS), which currently applies to its Acería de Álava steelmaking facility in Spain. This facility emits greenhouse gases from industrial processes and fuel combustion and is subject to verification and reporting obligations under the EU ETS. The company regularly assesses all other production sites across Europe to determine whether they meet the regulatory thresholds for inclusion, using an internal monitoring tool based on capacity and emission profiles. In preparation for the progressive reduction and eventual phase-out of free allowances by 2035, Tubacex is strategically preparing for the full operational and financial impact of the EU ETS. In parallel, it has launched an internal adaptation project to address the requirements of the Carbon Border Adjustment Mechanism (CBAM) under EU Regulation 2023/956. The company has begun collecting and reporting emissions embedded in imports, as required under the transitional phase of CBAM, and is implementing the necessary IT and procedural infrastructure to ensure full compliance in the permanent phase. Tubacex's broader climate compliance strategy is embedded within its Climate Transition Plan, which outlines a decarbonization roadmap aligned with its corporate sustainability vision. In 2024, the company received validation from the Science Based Targets initiative (SBTi) for its science-aligned objectives, including a 64.32% absolute reduction in Scope 1 and 2 GHG emissions and a 55.4% intensity reduction in Scope 3 emissions by 2030, using 2019 as a base year. These targets are being pursued through multiple levers, including energy efficiency improvements, increased use of renewable electricity, process electrification, and circular economy measures. Additionally, Tubacex is actively preparing to meet broader EU regulatory requirements such as the Corporate Sustainability Reporting Directive (CSRD) and EU Taxonomy Regulation. In 2023, it conducted a comprehensive gap analysis to align its ESG practices with the European Sustainability Reporting Standards (ESRS) and subsequently in 2024 has worked on developing its sustainability report in line with the standards. As part of this preparation, Tubacex is enhancing its ESG data systems, integrating climate and sustainability criteria into its procurement strategy, and strengthening risk management frameworks related to climate and environmental compliance. This holistic approach ensures the company not only complies with current and emerging regulations but also strengthens its long-term resilience and competitiveness in a low-carbon economy.

(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
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

By-products generated by the stainless steel industry, such as slags, contain high-value elements in the form of oxides or metals. Some of these elements can be environmentally problematic if disposed of incorrectly. Stainless steel slags are currently the main type of non-hazardous waste generated by the Group. Therefore, any approach toward circular economy solutions for the treatment, recovery and valorization of this type of waste would have a significant economic and environmental impact. Reducing waste generation would positively affect the risk of ecosystem contamination near the plants, decreasing the likelihood of habitat degradation and reducing the resilience of local species (e.g., through disease spread or contributing to the increase of invasive species). In this regard, TUBACEX has the opportunity to improve its recovery processes by increasing the recovery of metals that will later be used as inputs in steel manufacturing. This will not only reduce the need for raw materials but also help decrease the waste generated by the company and the environmental impact caused by waste generation.

(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. The circular economy approach for the treatment, recovery and valorization of stainless-steel slag could have a significant economic and environmental impact.

(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)

660000

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

700000

(3.6.1.23) Explanation of financial effect figures

To assess the financial impact of optimizing waste management at TUBACEX, the current cost related to managing its main non-hazardous waste, stainless steel slags, has been analyzed. This waste undergoes R4 treatment for the recovery of metals and metallic compounds. Currently, the valorization process is carried out at a specialized plant in Europe dedicated to stainless steel industry products, representing an operational cost for TUBACEX of between €1,323,000 and €1,393,000. To improve efficiency and reduce management and transportation costs, TUBACEX conducted a market study to identify valorization plants in Spain that would allow local waste management. As a result, a local supplier in the Germany was identified, which would reduce the operational costs associated with the treatment of this

waste by half. Based on this analysis, TUBACEX has made the strategic decision to switch to this local supplier, allowing significant savings in operational costs. However, as the supplier change has not yet been implemented, no financial impacts were recorded in the reporting year. To estimate short-term OPEX savings under this new alternative, the 2024 operational expenditure is taken as a reference, applying the expected 50% reduction.

(3.6.1.24) Cost to realize opportunity

0

(3.6.1.25) Explanation of cost calculation

Although the agreement with the local provider was formalized in 2024, the transition process is still underway; therefore, no cost reductions were realized in the 2024 reporting year. Full financial benefit is expected to materialize in the short term, once operational integration is completed.

(3.6.1.26) Strategy to realize opportunity

SITUATION Slag generated from stainless steel production, particularly at the Aceralava facility, represents the main non-hazardous industrial waste stream within Tubacex. Historically, this material was treated at a specialized recovery plant in Europe, leading to significant logistics and processing costs. In addition to the economic impact, the company recognized an opportunity to enhance its circular economy performance by recovering valuable metals and repurposing non-recoverable slag. One of the strategic pillars of Tubacex's Climate Change Transition Plan is promoting waste circularity, prioritizing recycling and reuse over landfill disposal. TASK Tubacex aimed to establish a more cost-effective, local, and circular strategy for slag management, with a dual goal: reduce operational expenses and increase waste reuse and recycling rates. The company is committed to achieving 95% recycling of waste by 2030. The key initiative focuses on promoting sustainable alternatives to landfilling, particularly the recycling of Aceralava's main waste, slag, via a specialized provider that recovers part of the mineral for reintegration into production and repurposes non-recoverable material for asphalt in road construction. - The slag valorization project was initiated in 2022 and scaled up over the following years. Actions included: - Avoiding landfill disposal of 14,487 tonnes of slag in 2023 and 13,926 tonnes in 2024. - Conducting a market study to evaluate alternative recovery options within Spain. - Selecting a local provider in Spain to recover metallic content and reuse non-recoverable slag in road construction. RESULT Although full operational savings will be realized in the short term, the initiative directly contributes to Tubacex's circularity rate, which reached 82.32% in 2024, up from 81.96% in 2023. The project plays a central role in the roadmap to achieve 95% waste recovery and recycling by 2030, while reducing environmental impact, lowering logistics emissions, and supporting regional circular economy goals.

Water

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp6

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Reputational capital

☑ Other reputational capital opportunity, please specify :Increase in the transparency of environmental practices and policies resulting from the disclosure obligations of the CSRD Directive.

(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

(3.6.1.6) River basin where the opportunity occurs

Select all that apply

☑ Other, please specify :Nervion River

(3.6.1.8) Organization specific description

The European Union's Corporate Sustainability Reporting Directive (CSRD) imposes new disclosure requirements on companies' environmental practices and policies. These disclosure obligations provide a valuable opportunity to enhance corporate reputation by increasing transparency and strengthening stakeholder relationships. By adopting a proactive and transparent approach that demonstrates its commitment to pollution prevention and control, Tubacex can improve

stakeholder relations, generating greater trust and credibility. This approach not only ensures regulatory compliance but also delivers significant long-term benefits in terms of reputation, loyalty, and competitiveness.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Other, please specify :Increase in revenue

(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 increased business volume.

(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)

20720000

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

25330000

(3.6.1.23) Explanation of financial effect figures

To assess the financial impact of this opportunity, the following aspects have been considered: - Several recent studies support the direct relationship between improved corporate reputation, resulting from the adoption of ESG disclosure and transparency practices and better financial performance. Notable examples include the IE University research project titled "The Connection Between Purpose and Profit: Are ESG Strategies Worth It?" and the academic article "Leveraging ESG Reporting for Corporate Reputation: A Study on Supply Chain Transparency in Environmental Practices", both published in 2025. - According to an article published by Grupo Caliber in 2025, a company specialized in marketing and public relations, reputation contributes between 3% and 7.5% of a company's annual revenue. To estimate the potential financial impact, a 3% increase in Tubacex's business volume has been projected, taking 2024 reported revenue as a reference. This percentage is adopted with a conservative approach, selecting the lower end of the range identified in the reference studies. Additionally, to account for possible variations in market conditions and the effectiveness of implemented initiatives, a ±10% margin of uncertainty has been applied to the estimated result.

(3.6.1.24) Cost to realize opportunity

35000

(3.6.1.25) Explanation of cost calculation

As the cost of implementing the opportunity, the operational expenses (OPEX) corresponding to the hiring of consultancy services for the disclosure and compliance with the requirements established by the CSRD, incurred during the reporting year, have been considered.

(3.6.1.26) Strategy to realize opportunity

SITUATION Within its sustainability strategy, TUBACEX has set an ambitious course toward a more sustainable future, establishing key strategic objectives focused on business decarbonization and circularity, development of innovative solutions supporting the energy transition, protection and welfare of people and local communities and the strengthening of a robust culture of transparency and integrity. TASK The company aimed to consolidate an ethical and transparent culture while improving ESG data quality, traceability and reliability. This includes enhancing ESG performance and presence in sustainability ratings such as CDP and S&P, to ensure consistent improvement and stakeholder trust. Action: TUBACEX implemented strategic actions under the pillar "Do the right thing and foster transparency": - Adhering to the highest ethical and compliance standards. - Strengthening information governance, ESG management, and sustainable financing. - Promoting an active risk management culture. - Developing a solid model of internal and external communication. Specifically, the company focused on: -Implementing a dedicated ESG data consolidation system to improve data quality and reliability. -Increasing presence and performance in ESG ratings, achieving 49 points in S&P and an A- rating in CDP 2024. RESULT These actions have strengthened TUBACEX's governance and transparency framework, enhanced ESG data credibility and positioned

the company to meet or exceed external ESG evaluation standards. This strategy supports long-term sustainability goals, builds stakeholder trust and reinforces TUBACEX's commitment to ethical practices and regulatory compliance.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☑ Other energy source opportunity, please specify :Energy efficiency of 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 the operational costs (OPEX) of TUBACEX's activities. In addition, it represents a valuable opportunity to contribute positively to biodiversity. Implementing energy-efficient technologies not only enhances the company's sustainability but also helps protect and preserve ecosystems. This includes the use of more efficient furnaces, optimization of manufacturing processes through the implementation of energy management and advanced automation systems, as well as the recovery of waste heat for reuse in the production process. By reducing emissions and resource consumption, environmental impact is minimized and biodiversity conservation is promoted.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Other, please specify :Reduction of OPEX in energy consumption

(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

☑ The opportunity has already had a substantive effect on our organization in the reporting year

(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

(3.6.1.13) Effect of the opportunity on the financial position, financial performance and cash flows of the organization in the reporting period

The opportunity has already had an impact on the organization in the reporting year, in terms of reducing operational energy consumption costs.

(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 energy consumption costs.

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

Select from:

☑ Yes

(3.6.1.16) Financial effect figure in the reporting year (currency)

41000

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

7380000

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

9020000

(3.6.1.23) Explanation of financial effect figures

To assess the financial impact of this opportunity, the energy efficiency measures implemented during the reporting year, as well as those planned in the short term, have been considered. These measures generate an estimated annual energy saving in kWh. This saving is multiplied by the average electricity cost for the facility where it occurs, allowing the estimation of the monetary savings at the OPEX level achieved by Tubacex. Initiatives include, among others, optimization of cooling and compressor systems, as well as improvements to hydraulic systems. The figure reported for the reference year corresponds to the savings generated by projects already executed across Tubacex's facilities. The short-term estimate considers the expected impact of planned projects and initiatives. A ±10% margin is applied to this projection to account for potential deviations in the results.

(3.6.1.24) Cost to realize opportunity

770000

(3.6.1.25) Explanation of cost calculation

As the cost of implementing the opportunity, the capital expenditure (CAPEX) and operational expenses (OPEX) associated with the energy efficiency projects and measures implemented during the reporting year have been considered.

(3.6.1.26) Strategy to realize opportunity

SITUATION TUBACEX identified improving energy efficiency across its facilities as a key opportunity to reduce environmental impact, lower emissions and optimize operational costs associated with energy consumption. TASK The objective was to develop and implement a corporate strategy to maximize energy and cost savings while ensuring effective monitoring of consumption and continuous improvement of efficiency across all Group plants. ACTION A corporate energy efficiency project was implemented, structured around three main pillars: - Integration of digital energy measurement and control systems connected with MES to optimize monitoring and energy management. - Optimization of production and workshop processes, with a focus on reducing energy consumption through operational and planning improvements. - Incorporation of energy-efficient technologies, including heat recovery systems, variable frequency drives and other innovations, enabling sustained reduction in consumption and emissions. RESULT These actions have allowed TUBACEX to achieve measurable reductions in operational energy costs (OPEX), improve process efficiency and advance corporate sustainability and decarbonization goals, generating economic savings while supporting responsible resource management.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp6

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Reputational capital

☑ Other reputational capital opportunity, please specify :Increase in the transparency of environmental practices and policies resulting from the disclosure obligations of the CSRD Directive.

(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

The European Union's Corporate Sustainability Reporting Directive (CSRD) imposes new disclosure requirements on companies' environmental practices and policies. These disclosure obligations provide a valuable opportunity to enhance corporate reputation by increasing transparency and strengthening stakeholder relationships. By adopting a proactive and transparent approach that demonstrates its commitment to pollution prevention and control, Tubacex can improve stakeholder relations, generating greater trust and credibility. This approach not only ensures regulatory compliance but also delivers significant long-term benefits in terms of reputation, loyalty, and competitiveness.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Other, please specify :Increase in revenue

(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 increased business volume.

(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)

20720000

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

25330000

(3.6.1.23) Explanation of financial effect figures

To assess the financial impact of this opportunity, the following aspects have been considered: - Several recent studies support the direct relationship between improved corporate reputation, resulting from the adoption of ESG disclosure and transparency practices and better financial performance. Notable examples include the IE University research project titled "The Connection Between Purpose and Profit: Are ESG Strategies Worth It?" and the academic article "Leveraging ESG Reporting for Corporate Reputation: A Study on Supply Chain Transparency in Environmental Practices", both published in 2025. - According to an article published by Grupo Caliber in 2025, a company specialized in marketing and public relations, reputation contributes between 3% and 7.5% of a company's annual revenue. To estimate the potential financial impact, a 3% increase in Tubacex's business volume has been projected, taking 2024 reported revenue as a reference. This percentage is adopted with a conservative approach, selecting the lower end of the range identified in the reference studies. Additionally, to account for possible variations in market conditions and the effectiveness of implemented initiatives, a ±10% margin of uncertainty has been applied to the estimated result.

(3.6.1.24) Cost to realize opportunity

35000

(3.6.1.25) Explanation of cost calculation

As the cost of implementing the opportunity, the operational expenses (OPEX) corresponding to the hiring of consultancy services for the disclosure and compliance with the requirements established by the CSRD, incurred during the reporting year, have been considered.

(3.6.1.26) Strategy to realize opportunity

SITUATION Within its sustainability strategy, TUBACEX has set an ambitious course toward a more sustainable future, establishing key strategic objectives focused on business decarbonization and circularity, development of innovative solutions supporting the energy transition, protection and welfare of people and local communities and the strengthening of a robust culture of transparency and integrity. TASK The company aimed to consolidate an ethical and transparent culture while improving ESG data quality, traceability and reliability. This includes enhancing ESG performance and presence in sustainability ratings such as CDP and S&P, to ensure consistent improvement and stakeholder trust. Action: TUBACEX implemented strategic actions under the pillar "Do the right thing and foster transparency": - Adhering to the highest ethical and compliance standards. - Strengthening information governance, ESG management, and sustainable financing. - Promoting an active risk management culture. - Developing a solid model of internal and external communication. Specifically, the company focused on: -Implementing a dedicated ESG data consolidation system to improve data quality and reliability. -Increasing presence and performance in ESG ratings, achieving 49 points in S&P and an A- rating in CDP 2024. RESULT These actions have strengthened TUBACEX's governance and transparency framework, enhanced ESG data credibility and positioned the company to meet or exceed external ESG evaluation standards. This strategy supports long-term sustainability goals, builds stakeholder trust and reinforces TUBACEX's commitment to ethical practices and regulatory compliance.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp15

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☑ Other markets opportunity, please specify :Use of the Energy Efficiency Certificate System

(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

Related to OP_CC_02, particularly for the facilities in Spain, TUBACEX could choose to leverage the Energy Savings Certificate (CAEs) system to increase operational efficiency and gain a competitive advantage in the market. This system, which promotes the co-financing of investments in energy efficiency, can provide significant support for TUBACEX to enhance energy efficiency through various measures in its facilities and vehicle fleet.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Other, please specify :Increase in revenue

(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 increased revenue.

(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)

3740000

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

3760000

(3.6.1.23) Explanation of financial effect figures

To assess the financial impact of this opportunity, the energy efficiency measures already implemented have been considered, which have generated energy savings eligible under the CAEs framework. Based on this, the potential revenue that TUBACEX could obtain has been estimated, both from the CAEs already awarded, according to available information and from the CAEs expected to be generated in the short term, calculated based on the estimated savings and a range of market prices for these certificates. The sum of both values constitutes the total projection.

(3.6.1.24) Cost to realize opportunity

11470000

(3.6.1.25) Explanation of cost calculation

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

(3.6.1.26) Strategy to realize opportunity

SITUATION Tubacex set a target to reduce energy intensity by 25% by 2030 compared to 2019 (MWh/€VAB), aiming for a ratio of 2.13 MWh/€VAB. The company identified its steelmaking operations, particularly PIT furnaces, as key areas for efficiency improvements to achieve this goal. TASK The objective was to implement energy efficiency measures that would lower energy intensity, reduce Scope 1 and 2 emissions and ensure progress toward the Science-Based Targets Initiative (SBTi) approved goals. ACTION - Implemented energy efficiency upgrades in the steel mill, focusing on PIT furnaces. - Achieved ISO 50001 certification to standardize energy management practices. - Monitored energy performance to track intensity reductions against the 2019 baseline. - Planned future measures to further reduce Scope 2 emissions, including installation of LED lighting and replacement of equipment with lower-impact devices. RESULT By 2024, energy intensity was reduced to 1.50 MWh/€VAB, a 47% decrease from the baseline, surpassing the original target ahead of schedule. ISO 50001 certification contributed to a 54.4% reduction in Scope 1 and 2 emissions, moving closer to the SBTi-approved 64% reduction target for 2030. Future initiatives on Scope 2 reduction are expected to sustain progress toward the company's long-term energy efficiency and decarbonization objectives.
[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)

35655000

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

Select from:

☑ 21-30%

(3.6.2.4) Explanation of financial figures

Tubacex's financial performance in 2024 has been influenced by several environmental opportunities that led to reduced operating costs (OPEX). One major factor was the strategic shift in stainless steel slag management to a local Basque provider, expected to reduce the cost by 50% annually, considering current contracts and supplier sourcing. Additionally, energy efficiency projects, including digital monitoring systems, optimized furnaces, and process improvements, have continued to reduce electricity and gas consumption, contributing to long-term cost containment. Tubacex also projects a 60% reduction in natural gas use by 2030 compared to its 2019 baseline (326,423 MWh/year), which would significantly reduce energy expenditure. These initiatives, along with decarbonization strategies like Scope 1 and 2 emission targets validated by the SBTi and increased renewable electricity contracting (84% in 2024), indicate strong alignment between environmental opportunity realization and EBITDA performance. Further opportunities include process energy efficiency improvements, greater transparency driven by CSRD disclosure requirements, and the use of the Energy Savings Certificate (ESC) system in Spain.

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)

23025000

(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

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 was initiated in 2024 to ensure a more comprehensive understanding of the financial impact and potential benefits. In 2024, Tubacex advanced its water efficiency strategy by implementing a series of measures focused on closed-loop systems, reuse of water in rinsing and cooling circuits, and the installation of real-time monitoring systems. These actions were supported by a confirmed CAPEX investment of €261,000 in

2024, with an additional €585,824 budgeted for 2025, targeting facilities in water-sensitive regions such as Aceralava, Amurrio, and Llodio. While these measures are expected to reduce water consumption, improve resilience to drought-related restrictions, and lower operating risk, no direct alignment with EBITDA has yet been attributed. A key next step is the planned development of a water footprint analysis in 2025 based on ISO 14046, which will enable Tubacex to better quantify both the environmental and financial impact of water-related opportunities. This staged approach reflects a growing strategic focus on water stewardship within the broader ESG and decarbonization agenda.
[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 regular review of the composition of the Board, with a view to appointing individuals who meet established criteria. This approach seeks to integrate gender perspective in the different areas of organization and promote diversity and the elimination of any type of discrimination, including prejudices, roles and stereotypes in the Board. This enriches the diversity of the Council in terms of knowledge, career oath, background, nationality and gender, fostering a more 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

☑ Director on board

☑ Chief Executive Officer (CEO)

☑ Board-level committee

☑ 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

☑ Reviewing and guiding innovation/R&D priorities

☑ Overseeing and guiding the development of a climate transition plan

☑ 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

☑ 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 Sustainability and Good Governance Commission meets at least four times a year and reviews the deployment of the ESG strategy. With the aim of strengthening TUBACEX's governance structure, and in line with current recommendations and best practices in the field, the Board of Directors of TUBACEX agreed in 2022 to establish a new Sustainability and Good Governance Commission. The Commission is responsible for overseeing the promotion of the Company's ESG policies, ensuring their integration into the Strategic Plan, verifying that ESG risks are embedded in TUBACEX's risk management and control systems, setting the guidelines and criteria for the preparation of the Non-Financial Information Statement, and promoting alignment with the 17 Sustainable Development Goals (SDGs) across the Group. Additionally, it periodically evaluates the adequacy of the Corporate Governance System. Relevant information is presented as a 12-month trend and compared to the annual objectives defined. Besides this commission, the Chief Executive Officer also includes climate-related information in the monthly

management report submitted to the Board of Directors from June 2025. This includes updates on key indicators, progress towards defined targets, and milestone achievements, ensuring continuous oversight of climate action and sustainability performance at the highest governance level.

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

☑ Reviewing and guiding innovation/R&D priorities
☑ 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 Sustainability and Good Governance Commission meets at least four times a year and reviews the deployment of the ESG strategy. With the aim of strengthening TUBACEX's governance structure, and in line with current recommendations and best practices in the field, the Board of Directors of TUBACEX agreed in 2022 to establish a new Sustainability and Good Governance Commission. The Commission is responsible for overseeing the promotion of the Company's ESG policies, ensuring their integration into the Strategic Plan, verifying that ESG risks are embedded in TUBACEX's risk management and control systems, setting the guidelines and criteria for the preparation of the Non-Financial Information Statement, and promoting alignment with the 17 Sustainable Development Goals (SDGs) across the Group. Additionally, it periodically evaluates the adequacy of the Corporate Governance System. Relevant information is presented as a 12-month trend and compared to the annual objectives defined.

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

(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 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

☑ 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

☑ Overseeing reporting, audit, and verification processes

(4.1.2.7) Please explain

The Sustainability and Good Governance Commission meets at least four times a year and reviews the deployment of the ESG strategy. With the aim of strengthening TUBACEX's governance structure, and in line with current recommendations and best practices in the field, the Board of Directors of TUBACEX agreed in 2022 to establish a new Sustainability and Good Governance Commission. The Commission is responsible for overseeing the promotion of the Company's ESG policies, ensuring their integration into the Strategic Plan, verifying that ESG risks are embedded in TUBACEX's risk management and control systems, setting the guidelines and criteria for the preparation of the Non-Financial Information Statement, and promoting alignment with the 17 Sustainable Development Goals (SDGs) across the Group. Additionally, it periodically evaluates the adequacy of the Corporate Governance System. Relevant information is presented as a 12-month trend and compared to the annual objectives defined.
[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

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

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

The Commission on Sustainability and Good Governance is a delegated committee of the Board of Directors responsible for overseeing, approving and supervising the ESG plan. It monitors impacts, risks and opportunities, including those related to GHG emissions, climate risks and decarbonization initiatives. Sustainability management reports on the identification and analysis of materially relevant incidents, risks and opportunities at least once a year. Additionally, the Commission on Sustainability and Good Governance is informed quarterly of the progress of the sustainability plan, including the effectiveness of policies, actions, parameters and adopted targets in sustainability, as well as the definition and implementation of due diligence processes.

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 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 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

(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

The Commission on Sustainability and Good Governance is a delegated committee of the Board of Directors that oversees, approves and supervises the ESG plan. It is responsible for monitoring impacts, risks and opportunities including those related to water impacts, dependencies, risks and opportunities in the global model. The sustainability management team reports on the identification and analysis of materially relevant incidents, risks and opportunities at least once a year. Additionally, the Commission on Sustainability and Good Governance is informed quarterly about the progress of the sustainability plan, which includes the effectiveness of policies, actions, parameters and adopted targets in sustainability, as well as the definition and implementation status of due diligence processes.

Biodiversity

(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

☑ 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

(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 line with the commitments made in the Strategic Framework for Sustainability of TUBACEX, the company has adopted an integrated Environmental Policy that specifies the commitments associated with the main challenges and opportunities of environmental nature, including biodiversity. Through this policy, TUBACEX commits to protecting and preserving biodiversity and ecosystems by implementing measures that minimize the impact of industrial activities. The company also undertakes to promote these biodiversity protection requirements across its areas of influence. This integrated Environmental Policy was approved in December 2023 by the CEO, who is responsible for defining strategies, action plans and related objectives.
[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

TUBACEX uses a PDCA management model establishing KPIs annually across all areas, including sustainability metrics like energy intensity, GHG emissions, % of renewable electricity and waste management. These KPIs are linked to management evaluation via a top down goal setting and bottom-up performance evaluation approach, involving over 300 key employees. ESG targets represent 5% of total variable compensation alongside financial, departmental and individual goals. In 2024, the model focused on 3 indicators within the 5% ESG weight, one being Scope 1 and 2 emissions with a weight of 2%. In 2024, the Board of Directors approved a long-term incentive plan (2024-2026) for the CEO and executives, including share allocations. If multi-year strategic goals are met and the beneficiary's

relationship with the company is maintained, shares will be delivered as an incentive. Throughout 2025 the indicators have been restructured into 2 indicators, so 2.5% of the compensation would go to climate

Water

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

Select from:

☑ No, but we plan to introduce them in the next two years

(4.5.3) Please explain

In the current year, only two indicators related to greenhouse gas emissions have been considered within the incentive scheme, without including objectives or metrics directly related to water use or management. However, TUBACEX recognizes the strategic importance of the water resource, especially in the context of climate change and industrial sustainability. Therefore, work is being carried out on the development of a methodology for calculating the Group´s water footprint, which will allow for a better understanding and control of its impact in this area. This work will be the basis for the development of a new environmental incentive plan with a more detailed vision, which will include water-related targets in future year.
[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

☑ Shares

(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

TUBACEX integrates ESG objectives into both its short-term variable remuneration and long-term incentive plans, aligning them with its sustainability strategy—particularly in areas such as CO2 emissions reduction and the promotion of low-carbon business segments. In the short-term variable remuneration plan, ESG objectives represent 5% of the total weight, of which 2.5% is specifically linked to emissions reduction. This weight will increase to 3% in 2025, reflecting the

company's growing focus on climate-related performance. These indicators are integrated into the company's PDCA management process, which involves monthly monitoring and ties performance to individual evaluations at all levels—from middle management to senior leadership. In the long-term incentive plan (2024–2026), ESG criteria account for 10% of the total weight, with 5% specifically tied to sales in low-carbon segments, directly contributing to the company's climate transition strategy. Key performance indicators are reviewed and defined annually across all functional areas, ensuring that both financial and non-financial performance, including climate-related progress, are systematically tracked and incentivized.

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

Incentives play a key role in encouraging the implementation of sustainable practices and technologies. Notably, TUBACEX´s new variable compensation policy includes climate-related goals, such as reducing emissions intensity and lowering its carbon footprint, alongside traditional financial performance targets.
[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 form part of the Group as of the date of its approval. In addition, the Group is committed to collaborating with suppliers and customers (stakeholders) to promote sustainable practices and extend policy commitments throughout the value chain.

(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 form part of the Group as of the date of its approval. In addition, the Group is committed to collaborating with suppliers and customers (stakeholders) to promote sustainable practices and extend policy commitments throughout the value chain.

(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

(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

☑ Sustainable Development Goal 6 on Clean Water and Sanitation

(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) 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 represents the interests of Spanish Steel manufacturers and was one of the initiators and first signatories of the Pact for the Circular Economy, launched by the Ministry of Environment. The association´s members are committed to achieving climate neutrality by 2050. Additionally, for every tonne produced, 7€ is allocated to environmental investment. UNESID actively contributes to shaping the structure of both Spanish and European steel companies, as it is a member of Worldsteel and EUROFER. The association promotes corporate social responsibility and environmental sustainability, working closely with public authorities to develop legislation and technical standards through continuous and constructive dialogue. It also participates in the preparation of studies and statistical reports on the sector, fostering competitiveness and facilitating access for companies to international markets.

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

28443

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

Through this contribution, Tubacex ensures active participation in sector-wide initiatives focused on sustainability, decarbonization, and alignment with European and national climate objectives. By being part of UNESID, Tubacex contributes to collective efforts that provide technical expertise, data, and industry perspectives to policymakers. This engagement strengthens the dialogue between industry and regulators, enabling the development of realistic and effective policies, laws, and regulations that promote energy efficiency, reduce greenhouse gas emissions, and foster the transition to a low-carbon economy. It helps ensure that legislation considers both the environmental goals and the technological and economic feasibility for the steel industry, thus maximizing the positive impact on environmental protection while supporting industrial competitiveness.

(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

The European Steel Tube Association represents European manufacturers of steel tubes in various areas of EU regulation, particularly in trade defense, environmental regulation, standardization, foreign trade policy and other issues impacting the business of EU steel tube producers. To achieve these objectives, ESTA maintains close contact with the relevant services of the EU Commission to contribute to the development of trade files and work on environmental legislation.

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

2875

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

This membership allows Tubacex to stay directly connected to discussions on environmental and industrial policy that are highly relevant to its business activity. Through ESTA, Tubacex collaborates with peer companies to identify sector-specific challenges—such as decarbonization pathways, circular use of raw materials,

and efficiency in tube manufacturing—and to translate these into evidence-based recommendations for policymakers. This collective representation ensures that the particularities of the tube industry are recognized in EU regulations and standards, rather than being diluted within the broader steel sector.

(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

TUBACEX is a member of the International Gas Union (IGU), which engages globally across the full gas value chain. IGU promotes fair international gas trade, supports low carbon and renewable gas development (including hydrogen and biomethane), and advocates for climate-aligned infrastructure investment. It also organizes major conferences like the World Gas Conference to foster innovation. This aligns with TUBACEX´s alignment to decarbonization through responsible energy transition pathways.

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

6000

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

By participating in IGU, Tubacex engages in international dialogue on the role of natural gas and related technologies in the transition towards a lower-carbon energy system. This platform enables Tubacex to contribute to shaping global perspectives on energy policy, including the integration of renewable gases, hydrogen, and carbon capture solutions. Through its membership, Tubacex gains access to technical studies, scenario analysis, and policy discussions that inform regulatory frameworks across different jurisdictions. The funding therefore strengthens Tubacex’s ability to anticipate and influence international policy debates that may directly or indirectly affect the environmental performance of the gas value chain.

(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 :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 represents the interests of Spanish Steel manufacturers and was one of the initiators and first signatories of the Pact for the Circular Economy, launched by the Ministry of Environment. The association´s members are committed to achieving climate neutrality by 2050. Additionally, for every tonne produced, 7€ is allocated to environmental investment. UNESID actively contributes to shaping the structure of both Spanish and European steel companies, as it is a member of Worldsteel and EUROFER. The association promotes corporate social responsibility and environmental sustainability, working closely with public authorities to develop legislation and technical standards through continuous and constructive dialogue. It also participates in the preparation of studies and statistical reports on the sector, fostering competitiveness and facilitating access for companies to international markets.

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

28443

(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

Through this contribution, Tubacex ensures active participation in sector-wide initiatives focused on sustainability, decarbonization, and alignment with European and national climate objectives. By being part of UNESID, Tubacex contributes to collective efforts that provide technical expertise, data, and industry perspectives to policymakers. This engagement strengthens the dialogue between industry and regulators, enabling the development of realistic and effective policies, laws, and regulations that promote energy efficiency, reduce greenhouse gas emissions, and foster the transition to a low-carbon economy. It helps ensure that legislation considers both the environmental goals and the technological and economic feasibility for the steel industry, thus maximizing the positive impact on environmental protection while supporting industrial competitiveness.

(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

☑ ESRS

☑ 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 and Talent**

(4.12.1.6) Page/section reference

2. Environmental information

(4.12.1.7) Attach the relevant publication

Consolidated-Non-Financial-information-statement-2024_Tubacex.pdf

(4.12.1.8) Comment

TUBACEX presents its sustainability report for the 2024 financial year, prepared in accordance with the guidelines set out in Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022, as regards corporate sustainability reporting (CSRD), whose transposition into Spanish law is pending. This directive requires companies to disclose their environmental practices, including aspects related to pollution. This obligation represents an opportunity for TUBACEX to improve its reputation through transparency and trust-building with stakeholders. By acting proactively and with commitment, the company not only ensures regulatory compliance but also gains lasting benefits in terms of image, loyalty, and competitiveness. The report also incorporates certain breakdowns required by Law 11/2018 that are not expressly covered by the ESRS. Additionally, it includes information based on well-established references, including the Global Reporting Initiative (GRI) standards and EFRAG guidelines. The report covers the period from January 1 to December 31, 2024, and provides comparative data for 2023. It applies to the entire Group, except where specific indicators with defined scopes are detailed.

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

☑ ESRS

☑ 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

2. Environmental information

(4.12.1.7) Attach the relevant publication

Consolidated-Non-Financial-information-statement-2024_Tubacex.pdf

(4.12.1.8) Comment

TUBACEX presents its sustainability report for the 2024 financial year, prepared in accordance with the guidelines set out in Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022, as regards corporate sustainability reporting (CSRD), whose transposition into Spanish law is pending. This directive requires companies to disclose their environmental practices, including aspects related to pollution. This obligation represents an opportunity for TUBACEX to improve its reputation through transparency and trust-building with stakeholders. By acting proactively and with commitment, the company not only ensures regulatory compliance but also gains lasting benefits in terms of image, loyalty, and competitiveness. The report also incorporates certain breakdowns required by Law 11/2018 that are not expressly covered by the ESRS. Additionally, it includes information based on well-established references, including the Global Reporting Initiative (GRI) standards and EFRAG guidelines. The report covers the period from January 1 to December 31, 2024, and provides comparative data for 2023. It applies to the entire Group, except where specific indicators with defined scopes are detailed.
[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:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ First time carrying out analysis
[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 analysis of climate risks and opportunities is based on several core assumptions. These include strong policy measures like the European Green Deal and Spain's PNIEC, both aimed at achieving net-zero emissions by 2050. The analysis assumes that global and regional economies will transition toward low-carbon models, although the impact will vary by sector. Climate forecasts from the IPCC predict more extreme weather patterns and changes in resource availability, along with significant advancements in clean technologies and wider adoption of renewable energy. However, key uncertainties remain—particularly regarding the effectiveness of policies, the pace of technological development, and how economic conditions will evolve. The analysis also faces limitations due to its reliance on fluctuating data and projections. Regulatory changes and shifts in technology could further affect these assumptions. Nevertheless, TUBACEX is well-prepared to manage these uncertainties through flexible planning and in-depth scenario analysis, supporting a resilient, future-oriented strategy for addressing climate-related risks and opportunities. This assessment of climate risks and opportunities was developed during the first half of 2024 with a comprehensive approach aligned with the recommendations of the TCFD, the European Green Taxonomy, and the IPCC management framework. The main objective is to ensure the resilience of TUBACEX´s strategy and business model in the face of climate change challenges. This analysis includes physical risks, transition risks and climate opportunities, considering their financial and operational impact.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for TUBACEX´s climate risk and opportunity analysis is based on the following elements: - International Energy Agency (IEA) scenarios. - Policies, plans and strategies at regional (European Union) level, such as the European Green Pact, the targets defined in Fit for 55, REPowerEU, or those established under the EU ETS (European Union Emissions Trading System) market. - National policies, plans and strategies, such as Spain´s PNIEC 2021-2030, Spain´s Climate Change and Energy Transition Law 7/2021 and Spain´s National Climate Change Adaptation Plan (PNACC 2021-2023) Market trends, technological developments, and shifts in consumer and other stakeholder preferences toward low GHG emitting products and services have also been considered. Therefore, the assessment is based on a sustainability and climate neutrality scenario, with the premise of meeting the objectives of the Paris Agreement and achieving net-zero emissions by 2050. For TUBACEX, the scope of this analysis is crucial in identifying critical vulnerabilities in its business model. This assessment of climate risks and opportunities was developed during the first half of 2024 with a comprehensive approach aligned with the recommendations of the TCFD, the European Green Taxonomy and the IPCC management framework. The primary objective is to ensure the resilience of TUBACEX´s strategy and business model in the face of climate change challenges. This analysis includes physical, transition risks and climate opportunities, considering their financial and operational impact.

Water

(5.1.1.1) Scenario used

Water scenarios

☑ WWF Water Risk Filter

(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

☑ Liability

☑ Reputation

☑ Technology

☑ Acute physical

☑ Chronic physical

(5.1.1.7) Reference year

2024

(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

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

Stakeholder and customer demands

☑ Consumer attention to impact

Regulators, legal and policy regimes

☑ Level of action (from local to global)

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Macro and microeconomy

☑ Domestic growth

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The water-related risk analysis has been conducted following TNFD recommendations, applying a scenario-based approach across different time horizons. It aligns with the IPCC risk definition, considering the interaction of hazard, exposure and vulnerability. It assumes increasing pressures on water ecosystems due to more frequent and intense climatic events, changes in water availability and growing competition for the resource. Key assumptions include the progressive tightening of water regulations in countries where TUBACEX operates, along with rising costs linked to water use. Increased frequency of extreme events (droughts and floods) and potential deterioration in surface water quality are expected to affect both operations and ecological surroundings. Technological advances in water recycling and efficiency are assumed to progress gradually, but with uneven adoption across sites. Current infrastructure is vulnerable to extreme events, especially in areas with low water resilience. Hazard was assessed using the WWF Water Risk Filter composite index, combining current and projected climatic and physical variables under different future scenarios. Exposure is defined by the operational importance of each site (production volume, revenue, employment, water consumption) and the condition of receiving ecosystem. Sensitivity reflects dependence on and potential impact to water-related ecosystem services. Adaptive capacity was qualitatively evaluated based on corporate documentation, mitigation plans and expert judgment. The final measure of vulnerability is determined by combining each site's sensitivity and adaptive capacity. Key uncertainties include the quality and spatial resolution of hydrological and ecological data, the actual evolution of public policies, market responses and the effective implementation of planned measures. Additional constraint is granularity of the data which would be made better if the sites

develop environmental risk analysis or evaluations to develop data from site-specific studies. Another limitation is partial coverage of the supply chain.This analysis covers the most material owned sites. As a result, inherent risk classified as very high is water resource contamination at SBER Ternitz, and high inherent risks include contamination at ACVA, TTI Amurrio, TTI Llodio, TTP Umbergaon, SAT Greenville and TBX Spain assets, as well as increased flooding impacting infrastructure at TTP Umbergaon.

(5.1.1.11) Rationale for choice of scenario

The selection of the scenario for TUBACEX's water risk analysis is based on the need to assess the resilience of its business strategy in the face of climate change impacts on water resources. This analysis has been developed in accordance with the recommendations of the Taskforce on Nature-related Financial Disclosures (TNFD), using the WWF Water Risk Filter as the main tool. This tool enables a comprehensive assessment of physical water-related risks, including scarcity, flooding and quality degradation, across different time horizons (short, medium, and long term) and climate scenarios. The choice of this scenario is particularly relevant as it allows for the analysis of how changes in hydrological patterns, based on IPCC climate projections, may affect both the availability and functionality of water resources at our facilities. In this context, variables such as climate threat, local exposure and ecological sensitivity are incorporated, enabling the identification of locations where residual water-related risk is high. The assessment has been applied to the group's most material sites, taking into account both their share in production and their geographical location within vulnerable ecosystems. Exposure indicators were defined based on two components: i) production, personnel, revenue and water consumption, which represent 50% of the weighting; ii) the state of the aquatic ecosystem, assessed through the WWF Water Risk Filter, which accounts for the remaining 50%. This dual approach ensures that both operational relevance and environmental vulnerability are reflected in the exposure evaluation.

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

2019

(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 analysis of climate risks and opportunities is based on several core assumptions. These include strong policy measures, such as the European Green Deal and Spain's PNIEC, both aimed at achieving net-zero emissions by 2050. The analysis assumes that global and regional economies will transition toward low-carbon models, although the impact will vary by sector. Climate forecasts from the IPCC predict more extreme weather patterns and changes in resource availability, alongside significant progress in clean technologies and wider adoption of renewable energy. However, key uncertainties remain, particularly regarding the effectiveness of policies, the pace of technological development, and the evolution of economic conditions. The analysis also faces limitations due to its reliance on fluctuating data and projections. Regulatory changes and technological shifts could further affect these assumptions. Nevertheless, TUBACEX is well-prepared to manage these uncertainties through flexible planning and in-depth scenario analysis, supporting a resilient, future-oriented strategy for addressing climate-related risks and opportunities. This assessment of climate risks and opportunities was developed during the first half of 2024 with a comprehensive approach aligned with the recommendations of the TCFD, the European Green Taxonomy, and the IPCC management framework. The primary objective is to ensure the resilience of

TUBACEX's strategy and business model in the face of climate change challenges. The analysis includes physical risks, transition risks, and climate opportunities, considering their financial and operational impacts.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for the assessment of physical risks from climate change is based on the most recent climate projections within the existing range of IPCC scenarios. Reference is made to the Sixth Assessment Report (AR6) on climate change, which introduces Shared Socioeconomic Pathways (SSP), and which form the basis of the scenarios used for this analysis. The scenarios analyzed are detailed below: - SSP1- 2.6: A sustainability and climate neutrality scenario. - SSP2- 4.5: The reference scenario (baseline) - SSP3- 7.0: An intermediate scenario between the baseline and the worst-case scenario. - SSP5- 8.5: A scenario of higher dependence on fossil fuels and high impact of physical risks. Once the projections of the four scenarios described above have been analyzed, the physical risks are assessed based on the worst-case scenario identified, following the recommendations of the precautionary principle.

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

2019

(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 analysis of climate risks and opportunities is based on several core assumptions. These include strong policy measures, such as the European Green Deal and Spain's PNIEC, both aimed at achieving net-zero emissions by 2050. The analysis assumes that global and regional economies will transition toward low-carbon models, although the impact will vary by sector. Climate forecasts from the IPCC predict more extreme weather patterns and changes in resource availability, alongside significant progress in clean technologies and wider adoption of renewable energy. However, key uncertainties remain, particularly regarding the effectiveness of policies, the pace of technological development, and the evolution of economic conditions. The analysis also faces limitations due to its reliance on fluctuating data and projections. Regulatory changes and technological shifts could further affect these assumptions. Nevertheless, TUBACEX is well-prepared to manage these uncertainties through flexible planning and in-depth scenario analysis, supporting a resilient, future-oriented strategy for addressing climate-related risks and opportunities. This assessment of climate risks and opportunities was developed during the first half of 2024 with a comprehensive approach aligned with the recommendations of the TCFD, the European Green Taxonomy, and the IPCC management framework. The primary objective is to ensure the resilience of TUBACEX's strategy and business model in the face of climate change challenges. The analysis includes physical risks, transition risks, and climate opportunities, considering their financial and operational impacts.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for the assessment of physical risks from climate change is based on the most recent climate projections within the existing range of IPCC scenarios. Reference is made to the Sixth Assessment Report (AR6) on climate change, which introduces Shared Socioeconomic Pathways (SSP), and which form the basis of the scenarios used for this analysis. The scenarios analyzed are detailed below: - SSP1- 2.6: A sustainability and climate neutrality scenario. -

SSP2- 4.5: The reference scenario (baseline) - SSP3- 7.0: An intermediate scenario between the baseline and the worst-case scenario. - SSP5- 8.5: A scenario of higher dependence on fossil fuels and high impact of physical risks. Once the projections of the four scenarios described above have been analyzed, the physical risks are assessed based on the worst-case scenario identified, following the recommendations of the precautionary principle.

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

2019

(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

☑ 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 analysis of climate risks and opportunities is based on several core assumptions. These include strong policy measures, such as the European Green Deal and Spain's PNIEC, both aimed at achieving net-zero emissions by 2050. The analysis assumes that global and regional economies will transition toward low-carbon models, although the impact will vary by sector. Climate forecasts from the IPCC predict more extreme weather patterns and changes in resource availability, alongside significant progress in clean technologies and wider adoption of renewable energy. However, key uncertainties remain, particularly regarding the effectiveness of policies, the pace of technological development, and the evolution of economic conditions. The analysis also faces limitations due to its reliance on fluctuating data and projections. Regulatory changes and technological shifts could further affect these assumptions. Nevertheless, TUBACEX is well-prepared to manage these uncertainties through flexible planning and in-depth scenario analysis, supporting a resilient, future-oriented strategy for addressing climate-related risks and opportunities. This assessment of climate risks and opportunities was developed during the first half of 2024 with a comprehensive approach aligned with the recommendations of the TCFD, the European Green Taxonomy, and the IPCC management framework. The primary objective is to ensure the resilience of TUBACEX's strategy and business model in the face of climate change challenges. The analysis includes physical risks, transition risks, and climate opportunities, considering their financial and operational impacts.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for the assessment of physical risks from climate change is based on the most recent climate projections within the existing range of IPCC scenarios. Reference is made to the Sixth Assessment Report (AR6) on climate change, which introduces Shared Socioeconomic Pathways (SSP), and which form the basis of the scenarios used for this analysis. The scenarios analyzed are detailed below: - SSP1- 2.6: A sustainability and climate neutrality scenario. - SSP2- 4.5: The reference scenario (baseline) - SSP3- 7.0: An intermediate scenario between the baseline and the worst-case scenario. - SSP5- 8.5: A scenario of higher dependence on fossil fuels and high impact of physical risks. Once the projections of the four scenarios described above have been analyzed, the physical risks are assessed based on the worst-case scenario identified, following the recommendations of the precautionary principle.

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:

☑ 4.0ºC and above

(5.1.1.7) Reference year

2019

(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 analysis of climate risks and opportunities is based on several core assumptions. These include strong policy measures, such as the European Green Deal and Spain's PNIEC, both aimed at achieving net-zero emissions by 2050. The analysis assumes that global and regional economies will transition toward low-carbon models, although the impact will vary by sector. Climate forecasts from the IPCC predict more extreme weather patterns and changes in resource availability, alongside significant progress in clean technologies and wider adoption of renewable energy. However, key uncertainties remain, particularly regarding the effectiveness of policies, the pace of technological development, and the evolution of economic conditions. The analysis also faces limitations due to its reliance on fluctuating data and projections. Regulatory changes and technological shifts could further affect these assumptions. Nevertheless, TUBACEX is well-prepared to manage these uncertainties through flexible planning and in-depth scenario analysis, supporting a resilient, future-oriented strategy for addressing climate-related risks and opportunities. This assessment of climate risks and opportunities was developed during the first half of 2024 with a comprehensive approach aligned with the recommendations of the TCFD, the European Green Taxonomy, and the IPCC management framework. The primary objective is to ensure the resilience of TUBACEX's strategy and business model in the face of climate change challenges. The analysis includes physical risks, transition risks, and climate opportunities, considering their financial and operational impacts.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for the assessment of physical risks from climate change is based on the most recent climate projections within the existing range of IPCC scenarios. Reference is made to the Sixth Assessment Report (AR6) on climate change, which introduces Shared Socioeconomic Pathways (SSP), and which form the basis of the scenarios used for this analysis. The scenarios analyzed are detailed below: - SSP1- 2.6: A sustainability and climate neutrality scenario. - SSP2- 4.5: The reference scenario (baseline) - SSP3- 7.0: An intermediate scenario between the baseline and the worst-case scenario. - SSP5- 8.5: A scenario of higher dependence on fossil fuels and high impact of physical risks. Once the projections of the four scenarios described above have been analyzed, the physical risks are assessed based on the worst-case scenario identified, following the recommendations of the precautionary principle.

Water

(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

2024

(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

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

Stakeholder and customer demands

☑ Consumer attention to impact

Regulators, legal and policy regimes

☑ Level of action (from local to global)

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Macro and microeconomy

☑ Domestic growth

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

TUBACEX's analysis of water-related risks and opportunities is based on core assumptions regarding the increasing pressure on global freshwater resources due to climate change, regulatory developments, and ecosystem degradation. The analysis was conducted using the WWF Water Risk Filter and follows the TNFD framework, focusing on three main dimensions: water scarcity, flooding, and water quality degradation. These dimensions reflect IPCC projections under various climate scenarios and are particularly relevant for assessing how changing hydrological patterns could impact TUBACEX's operations. The analysis assumes that environmental and water-related regulations will become more demanding, particularly in water-stressed areas, and that stakeholder expectations around sustainable water management will grow. It also considers possible technological advances in water efficiency and reuse, which represent strategic opportunities. However, uncertainties remain regarding the pace of regulatory implementation, regional variability of water availability, and the sensitivity of ecosystems supporting our operations. To address these uncertainties, TUBACEX applies a flexible and location-specific approach that considers local exposure, ecological sensitivity, and adaptive capacity at each site. This enables the company to identify high-risk facilities and prioritize mitigation actions, such as water recycling targets and nature-based solutions. The objective is to ensure the resilience of the company's business model and long-term operations amid increasing water-related challenges, aligning with international frameworks and nature-related financial disclosure standards.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for the assessment of water-related physical risks at TUBACEX is based on IPCC climate projections, integrated through the WWF Water Risk Filter. Three representative climate pathways were analyzed: - Optimistic (RCP2.6/RCP4.4): Assumes strong mitigation measures, halving GHG emissions by 2050. Global temperature rise unlikely to exceed 2°C by 2100, resulting in lower water-related risks. - Intermediate (RCP4.5/RCP6.0): Reflects current trends where emissions peak mid-century. Temperatures likely exceed 2°C, increasing drought, flood, and water quality risks. - Pessimistic (RCP6.0/RCP8.5): Assumes no major mitigation; emissions rise throughout the century. Temperature increases likely exceed 4°C, with severe impacts on water availability and ecosystem health. TUBACEX bases its physical water risk assessment on the pessimistic scenario, following the precautionary principle to ensure the resilience of operations under worst-case conditions.

Water

(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

2024

(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
☑ Climate change (one of five drivers of nature change)

Finance and insurance
☑ Cost of capital

Stakeholder and customer demands
☑ Consumer attention to impact

Regulators, legal and policy regimes
☑ Level of action (from local to global)

Relevant technology and science

☑ Granularity of available data (from aggregated to local)

Macro and microeconomy

☑ Domestic growth

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

TUBACEX's analysis of water-related risks and opportunities is based on core assumptions regarding the increasing pressure on global freshwater resources due to climate change, regulatory developments, and ecosystem degradation. The analysis was conducted using the WWF Water Risk Filter and follows the TNFD framework, focusing on three main dimensions: water scarcity, flooding, and water quality degradation. These dimensions reflect IPCC projections under various climate scenarios and are particularly relevant for assessing how changing hydrological patterns could impact TUBACEX's operations. The analysis assumes that environmental and water-related regulations will become more demanding, particularly in water-stressed areas, and that stakeholder expectations around sustainable water management will grow. It also considers possible technological advances in water efficiency and reuse, which represent strategic opportunities. However, uncertainties remain regarding the pace of regulatory implementation, regional variability of water availability, and the sensitivity of ecosystems supporting our operations. To address these uncertainties, TUBACEX applies a flexible and location-specific approach that considers local exposure, ecological sensitivity, and adaptive capacity at each site. This enables the company to identify high-risk facilities and prioritize mitigation actions, such as water recycling targets and nature-based solutions. The objective is to ensure the resilience of the company's business model and long-term operations amid increasing water-related challenges, aligning with international frameworks and nature-related financial disclosure standards.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for the assessment of water-related physical risks at TUBACEX is based on IPCC climate projections, integrated through the WWF Water Risk Filter. Three representative climate pathways were analyzed: - Optimistic (RCP2.6/RCP4.4): Assumes strong mitigation measures, halving GHG emissions by 2050. Global temperature rise unlikely to exceed 2°C by 2100, resulting in lower water-related risks. - Intermediate (RCP4.5/RCP6.0): Reflects current trends where emissions peak mid-century. Temperatures likely exceed 2°C, increasing drought, flood, and water quality risks. - Pessimistic (RCP6.0/RCP8.5): Assumes no major mitigation; emissions rise throughout the century. Temperature increases likely exceed 4°C, with severe impacts on water availability and ecosystem health. TUBACEX bases its physical water risk assessment on the pessimistic scenario, following the precautionary principle to ensure the resilience of operations under worst-case conditions.

Water

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 6.0

(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

2024

(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
☑ Climate change (one of five drivers of nature change)

Finance and insurance
☑ Cost of capital

Stakeholder and customer demands
☑ Consumer attention to impact

Regulators, legal and policy regimes
☑ Level of action (from local to global)

Relevant technology and science
☑ Granularity of available data (from aggregated to local)

Macro and microeconomy
☑ Domestic growth

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

TUBACEX's analysis of water-related risks and opportunities is based on core assumptions regarding the increasing pressure on global freshwater resources due to climate change, regulatory developments, and ecosystem degradation. The analysis was conducted using the WWF Water Risk Filter and follows the TNFD framework, focusing on three main dimensions: water scarcity, flooding, and water quality degradation. These dimensions reflect IPCC projections under various climate scenarios and are particularly relevant for assessing how changing hydrological patterns could impact TUBACEX's operations. The analysis assumes that environmental and water-related regulations will become more demanding, particularly in water-stressed areas, and that stakeholder expectations around sustainable water management will grow. It also considers possible technological advances in water efficiency and reuse, which represent strategic opportunities. However,

uncertainties remain regarding the pace of regulatory implementation, regional variability of water availability, and the sensitivity of ecosystems supporting our operations. To address these uncertainties, TUBACEX applies a flexible and location-specific approach that considers local exposure, ecological sensitivity, and adaptive capacity at each site. This enables the company to identify high-risk facilities and prioritize mitigation actions, such as water recycling targets and nature-based solutions. The objective is to ensure the resilience of the company's business model and long-term operations amid increasing water-related challenges, aligning with international frameworks and nature-related financial disclosure standards.

(5.1.1.11) Rationale for choice of scenario

The selection of scenarios for the assessment of water-related physical risks at TUBACEX is based on IPCC climate projections, integrated through the WWF Water Risk Filter. Three representative climate pathways were analyzed: - Optimistic (RCP2.6/RCP4.4): Assumes strong mitigation measures, halving GHG emissions by 2050. Global temperature rise unlikely to exceed 2°C by 2100, resulting in lower water-related risks. - Intermediate (RCP4.5/RCP6.0): Reflects current trends where emissions peak mid-century. Temperatures likely exceed 2°C, increasing drought, flood, and water quality risks. - Pessimistic (RCP6.0/RCP8.5): Assumes no major mitigation; emissions rise throughout the century. Temperature increases likely exceed 4°C, with severe impacts on water availability and ecosystem health. TUBACEX bases its physical water risk assessment on the pessimistic scenario, following the precautionary principle to ensure the resilience of operations under worst-case conditions.
[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 is committed to strengthening its resilience against climate-related risks and capitalizing on potential climate-related opportunities. To achieve this, the company needs to understand how different climate scenarios could affect its operations and strategy. The company must anticipate both physical risks (such as extreme weather) and transition risks (from moving toward a low-carbon economy) to ensure its long-term viability. TUBACEX needed to assess the potential impacts of climate change on its operations. This included identifying and evaluating various risks and opportunities across different time horizons and developing an effective framework to incorporate climate-related factors into the company's strategic planning. Additionally, the company aimed to update its risk assessment model for 2024, considering global and regional climate change strategies and aligning with internationally recognized frameworks. The company implemented scenario analysis as a strategic tool, using the most recent climate projections from the IPCC and incorporating Shared Socioeconomic Pathways (SSPs) to evaluate different future scenarios. It analysed the following scenarios: • A climate-neutral and sustainability scenario: Focused on significant efforts to reduce greenhouse gas emissions, used to assess transition risks and climate opportunities. • The baseline scenario (Trend): A reference scenario based on historical patterns, useful for assessing physical risks. • Fossil-fuel-dependent scenario: Assumed a high impact of physical risks due to continued dependence on fossil fuels In 2024, the company updated its climate risk and opportunity model based on IPCC recommendations, considering three SSPs: SSP2-4.5 (trend), SSP3-7.0 (high GHG emissions), and SSP5-8.5 (very high GHG emissions). This included evaluating physical risks (acute and chronic) across three-time horizons: short-term (2020-2039), medium-term (2040-2059), and long-term (2080-2099). The analysis also considered transition risks, based on the Paris Agreement Climate Neutrality Target (IPCC SSP1-2.6) and the IEA Net Zero Emissions by 2050 scenario. Transition risks were categorized into regulation, technology, market, and reputational risks, while opportunities were based on resource efficiency, energy sources, products and services, market access, and resilience. As a result of this comprehensive analysis, TUBACEX was able to identify and assess critical climate-related risks and opportunities for its business. This enabled the company to proactively develop strategies to reduce risks and capitalize on emerging opportunities. The updated climate risk model, aligned with the TCFD and CDP recommendations, provides a robust framework for the company to navigate future uncertainties, ensuring the resilience of its strategy and business model to the challenges posed by climate change.

Water

(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

(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 is committed to strengthening its resilience against water-related risks and taking advantage of opportunities that may arise from the climate context. To this end, the company has developed a scenario analysis to understand how different climate trajectories may affect the availability and quality of water resources, as

well as their impact on operations, facilities and ecosystems where it operates. The assessment is based on the most recent climate projections from the IPCC and has been developed using the WWF Water Risk Filter tool, which allows for a comprehensive assessment of physical water risks (such as scarcity, flooding and water quality deterioration) across different time horizons (short, medium and long term). In line with the Task Force on Climate-related Financial Disclosure (TCFD) recommendations, this analysis builds on the tool´s current basin risk assessment framework and incoporates the most relevant climate scenarios (IPCC Representative Concentration Pathways - RCPs) and socio-economic narratives (IIASA Shared Socioeconomic Pathways - SSPs). Accordingly, the Water Risk Filter scenarios follor the respective combined pathways. The scenarios considered include: 1.- Optimistic scenario pathway represents a world with sustainable socio-economic development (SSP1) and moderate reduction of GHG emissions (RCP2.6 /RCP4.5), leading to an increase of global mean surface temperature of approximately 1.5°C by the end of the 21st century. 2.- Current trend scenario pathway represents a world similar to current socio-economic development trends (SSP2) and intermediate GHG emission levels (RCP4.5 /RCP6.0), leading to an increase of global mean surface temperature of approximately 2°C by the end of the 21st century. 3.- Pessimistic scenario pathway represents a world with unequal and unstable socio-economic development (SSP3) and high GHG emission levels (RCP6.0 /RCP8.5), leading to an increase of global mean surface temperature of approximately 3.5/4°C by the end of the 21st century.
[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 acknowledges the urgency of addressing climate change and supports a progressive transition to a low-carbon economy. However, we have not explicitly committed to ceasing all spending on or revenue generation from activities that contribute to fossil fuel expansion, as we consider that an immediate and absolute disengagement could generate significant socio-economic disruptions. Our approach is based on a gradual and responsible transition that balances environmental objectives with energy security, customer needs and industrial competitiveness. We continue to focus on improving energy efficiency, reducing emissions and exploring opportunities to support the decarbonization of hard-to-abate sectors. In this context, we aim to contribute to a just transition that is technically and economically viable, without compromising the stability of our operations or the needs of our stakeholders.

(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´s transition plan is embedded within our business strategy and communicated through various channels to all our stakeholders, including shareholders, financial institutions, employees, suppliers, clients and the wider community. The FY2024 results for TUBACEX were shared in a live webcast open to the public, which can be viewed on our website. – Shareholders: They review and approve the management report during the Annual General Meeting. – Board: The strategy and sustainability plan are reviewed by the strategy committee and the Sustainability and Good Governance Commission. -Investors and financial institutions: Engage through regular one-on-one meetings and roadshows. – Suppliers: Two feedback mechanisms are in place: i) regular bilateral meetings with key suppliers to exchange feedback and align on strategic priorities; and ii) annual supplier days, planned to resume in 2025, serving as a platform to present our strategy and gather broader supplier input. – Clients: i) Regular one-on-one meetings with key clients; ii) annual satisfaction surveys that include sustainability topics. – Employees: i) town hall meetings held in each business unit; i) suggestion schemes incorporated within our production operating model (TxPS). – Governments: periodic meetings with local and regional governments and public agencies in the areas where we operate. – Society: Analysis of the feedback from social media channels.

(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

The Transition Plan aims to significantly reduce the organization’s carbon footprint, aligning with the global goals of the Paris Agreement and contributing to the transition to a low-carbon economy. The key objectives of the Plan have been defined and validated according to the Science-Based Goals initiative (SBTi) demonstrating that these goals contribute to limiting global temperature increase to 1.5ºC. The company is currently committed to reducing its carbon footprint across all activities, working towards achieving climate neutrality by 2050. As part of the commitment to sustainability, the follow-up to the Transition Plan has involved implementing various strategic actions aimed at improving processes and reducing environmental impact. This transition plan, approved by the TUBACEX Board of Directors, is also aligned with the company’s strategic plan, particularly through one of the pillars of its foundational pillars: sustainability and energy transition. The

strategy of the Transition Plan is based on three key levers: process efficiency through technological innovations, switching to renewable energy sources and boosting waste circularity. The ultimate goal of this plan is to meet the emission reduction targets validated by the SBTi with a path that is updated annually, based on the actions carried out and planned by the production plants..

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

TUBACEX's business strategy unfolds in three main phases under its Strategic Plan. The first phase focuses on strengthening its traditional product lines by supporting existing customers in their decarbonization efforts, offering solutions that reduce environmental impact and improve efficiency. At the same time, the company aims to reinforce its leadership in highly profitable market segments. The second phase, which runs alongside the first, targets low-emission energy sources. During this phase, TUBACEX is developing innovative technologies for energy generation, storage, and transport in emerging areas such as hydrogen and carbon capture and storage (CCS), reflecting the growing global focus on clean energy. The third and final phase emphasizes diversification and expansion, exploring both organic and inorganic growth opportunities in sectors like power generation and mobility, with the goal of launching and scaling new business lines.

(5.2.12) Attach any relevant documents which detail your climate transition plan (optional)

Consolidated-Non-Financial-information-statement-2024_Tubacex.pdf

(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

Situation In 2023, the EU introduced two major carbon-related regulations: EU ETS 2, to be implemented in 2027, which will regulate CO_2 emissions from fuel use in buildings and transport, potentially increasing freight costs for TUBACEX's European sites (Austria, Italy, Spain); and the Carbon Border Adjustment Mechanism (CBAM), which applies to imported energy-intensive goods. From 2026, CBAM will require importers to purchase certificates to match EU carbon pricing. During the transitional period (Oct 2023–Dec 2025), importers must report embedded emissions quarterly. This poses a risk to TUBACEX, particularly due to reliance on non-EU suppliers that often lack emissions data. Task TUBACEX needed to prepare for increased compliance and cost risks, meet CBAM's quarterly reporting requirements, and anticipate the financial impact of purchasing certificates. A key challenge was the lack of emissions transparency among several third-country suppliers. Additionally, the company aimed to explore opportunities to reduce environmental impact and enhance resource efficiency, particularly regarding the management of stainless steel slag, its primary non-hazardous waste. Action The company conducted internal impact assessments to forecast future cost increases from EU ETS 2 and CBAM. It developed a reporting framework aligned with CBAM obligations and engaged with non-EU suppliers to collect emissions data. In parallel, TUBACEX began evaluating circular economy solutions for recovering valuable elements from stainless steel slag to minimize waste and environmental risks. Result TUBACEX improved its regulatory preparedness by setting up emissions tracking systems ahead of CBAM's full implementation. It identified supply chain vulnerabilities and began addressing them through early supplier engagement. The slag valorization strategy has revealed environmental and economic benefits, supporting TUBACEX's transition toward a more sustainable and resilient operating model under evolving EU climate regulations.

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

Situation TUBACEX operates in a complex market where ESG considerations are increasingly relevant. The company must identify risks and opportunities tied to sustainability, particularly regarding GHG emissions and alignment with the Paris Agreement's goal of reaching net-zero emissions by 2050. New regulations, such as the EU Emissions Trading Scheme (EU ETS II), and changing stakeholder preferences for low emission products create added pressure. Furthermore, environmental issues like pollution prevention and control, are gaining attention from stakeholders. Task The company needed to assess suppliers' ESG performance to ensure compliance with sustainability goals and manage environmental and social risks. The company also had to evaluate the impacts of new frameworks like the EU ETS II and the EU Action Plan 'Towards a Zero Pollution for Air, Water and Soil' on its supply chain and operations. It aimed to improve ESG performance, assess risks, and align operations with the Paris Agreement´s goals. This included ensuring supplier compliance with the Group´s environmental and social standards, preparing for regulatory changes and strengthening stakeholder trust through sustainable practices. Action In 2024, TUBACEX assessed 913 suppliers, representing 87.7% of its purchase volume, against ESG criteria. These suppliers had to meet TUBACEX's social and environmental standards to be approved. They completed a detailed questionnaire on environmental management, generating a specific rating per supplier. TUBACEX reviewed its management processes to incorporate sustainability into its supply chain evaluation by supplier category and region (Tier 1). This helped the company better understand potential risks and develop an approval process that effectively evaluates and drives sustainability performance. TUBACEX monitored regularly developments like EU ETS II and stakeholder concerns about environmental impacts, addressing both risks and opportunities. The company considered potential indirect effects on freight transport in Europe, especially for facilities in Austria, Italy and Spain. Recognizing growing stakeholder interest in responsible practices, TUBACEX prioritizes evaluating suppliers accordingly and enhancing its internal systems to improve sustainability across the value chain. Result TUBACEX successfully assessed and rated its suppliers' ESG performance, ensuring 100% compliance with its sustainability requirements. The process enabled the company to identify and mitigate social and environmental risks across its supply chain. By aligning with new EU regulations and the Zero Pollution Action Plan, TUBACEX strengthened stakeholder relations and reinforced its position as a responsible business, this approach enhanced the company´s reputation, reduced environmental risks and supported long-term resilience in a market increasingly driven by ESG expectations.

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

Situation TUBACEX operates in an energy-intensive industrial sector, with current processes largely dependent on natural gas. In this context, reducing CO_2 emissions and improving energy efficiency have become strategic priorities. Furthermore, these efforts offer an opportunity to contribute to biodiversity preservation and ecosystem protection, aligning with ESG expectations. Task The company needed to improve the energy efficiency of its production processes, reduce operational costs (OPEX), and decrease its environmental impact. Additionally, it aimed to enhance circularity and reduce business risks associated with natural resource dependencies across its value chain, thereby strengthening its ESG positioning. Action TUBACEX invested in R&D projects focused on increasing energy efficiency and decarbonization. These include implementing more efficient furnaces, optimizing manufacturing through advanced energy management and automation systems, and recovering waste heat for reuse in production. The company is also exploring renewable energy integration, such as the use of green hydrogen produced onsite via electrolyzers powered by renewable electricity, either self-generated or acquired through power purchase agreements (PPAs). Result These actions contribute directly to emission reductions and OPEX savings, while advancing circularity through waste recycling and lower environmental pollution. The transition supports biodiversity protection, reduces long-term energy costs, and decreases fossil fuel dependence. Collectively, these efforts enhance TUBACEX's ESG performance and resilience in a resource-constrained future. Currently, 31% of R&D efforts are devoted to the energy transition. Although the resources allocated to the energy transition in 2024 have maintained the trend of 2023, The increase in investment for the development of new solutions in the gas extraction segment has reduced the proportion devoted to the energy transition.

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

Situation ACERÍA DE ÁLAVA (ACVA) is impacted by carbon pricing mechanisms, especially the EU Emissions Trading Scheme (EU ETS), which is tightening with reduced allowances from 2024-2027 and declining free allocations for Scope 1 emissions from 2026-2030. The phased implementation of the EU Carbon Border Adjustment Mechanism (CBAM) from 2026-2034 may also increase production costs. Given its energy-intensive production processes, which currently rely heavily on natural gas, TUBACEX faces rising costs and operational risks. Task The company needed to manage the financial risks of reduced EU ETS allowances and CBAM, while working to lower its carbon footprint. Key priorities included transitioning to green electricity, enhancing energy efficiency, and exploring renewable energy integration—such as using green hydrogen produced with on-site electrolyzers powered by renewable energy or secured through power purchase agreements (PPAs). Action TUBACEX began its green transition in 2020, targeting 100% green electricity by 2025. By 2023, 82.5% of electricity used was green. The company strategically contracted green electricity for its facilities and adopted energy-efficient technologies, such as optimized furnaces, advanced energy management systems, and waste heat recovery. These actions improve process efficiency, reduce emissions, and lower operating costs (OpEx), supporting both sustainability and profitability. Result By mid-2024, TUBACEX had achieved 84% green electricity consumption. Through energy efficiency measures and the transition to green power, the company significantly reduced greenhouse gas emissions and environmental impacts. The integration of energy-efficient technologies further decreased operational costs. This strategy not only advances TUBACEX's carbon reduction goals but also strengthens energy security, lowers long-term energy costs, and reduces reliance on fossil fuels.

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

Situation Global competition for scarce natural resources such as water is increasing. This trend can influence stakeholder and public perceptions of companies that rely heavily on these resources, such as TUBACEX. Negative perceptions may arise from concerns over biodiversity impacts linked to water extraction and use,

particularly if companies are not seen as managing these resources sustainably. Furthermore, water stress and drought can reduce overall water availability, potentially leading to industrial water use restrictions. The steel industry is highly water-intensive due to its cooling systems, making production vulnerable to such limitations Task TUBACEX needed to mitigate potential reputational risks and production vulnerabilities associated with water scarcity. The company was tasked with improving water management, optimizing consumption, and ensuring operational continuity in regions increasingly exposed to water stress. Key impacts identified included: -Reduced production capacity due to lack of water or regulatory restrictions on industrial water use. -High investment costs for implementing recirculation and water-saving technologies. -Potential impacts on the customer portfolio due to low product availability. Action To address these risks and seize opportunities, TUBACEX implemented several water management strategies. These included: -Installing systems for treating and reusing water used in cooling, inspection, and cleaning processes. -Adopting advanced technologies such as closed-loop cooling systems and dry-cleaning methods to significantly reduce water consumption. -Deploying real-time monitoring systems to track water usage and quickly detect leaks or inefficiencies Result These measures positioned TUBACEX to proactively manage water-related risks while improving operational resilience. By optimizing water consumption and embracing circular water practices, the company reduced exposure to regulatory and reputational risks, enhanced production reliability, and strengthened stakeholder confidence in its environmental stewardship—particularly in regions prone to water scarcity.
[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): affects plant productivity due to limited water availability or industry-specific restrictions (as ACERÍA DE ÁLAVA, TTI AMURRIO and TTI LLODIO). It also leads to high investment costs for new recirculation and water saving technologies as well as impacts on the customer portfolio due to low product availability. - Carbon pricing (transition risk): EU ETS II raises costs, addressed via investments in emission reduction technologies and renewables. Between 2024 and 2027, the total number of allowances issued in the EU will gradually decrease (by 4.3% per year, and by 4.4% per year from 2028). - Fossil fuel dependency (transition risk): reliance on fossil fuels for electricity is mitigated by power purchase agreements (PPAs) to improve efficiency and increase green energy use. During the first half of 2024, green electricity accounted for 84% of electricity consumed at Group level. However, a significant part of the Group's consumption still comes from emission-generating sources (diesel, propane and natural gas). - Carbon border adjustment mechanism (CBAM) (transition risk): CBAM introduces new reporting requirements and potential cost increases for imports. We are developing systems to manage these new requirements and avoid cost impacts. - Efficiency opportunities: improving energy efficiency in processes directly impacts reducing emissions and lowering operating costs (OPEX) for TUBACEX activities. Implementing energy-efficient technologies represents a valuable opportunity for the company. 2. Changes in resources, resource allocation and funding plans: TUBACEX adjusts its resource strategies to respond to risks. For example, to manage carbon pricing risks under EU ETS II, the company invests in carbon-reducing technologies and renewable energy, reallocating resources accordingly. 3. Case Study: Decarbonization Initiatives at ACERÍA DE ÁLAVA: TUBACEX has implemented measures such as speed variators in furnace motors and pressure control systems to reduce Scope 1 emissions. Future initiatives include reducing CO2 equivalent emissions (Scope 1 and 2) by 64.32% in absolute terms by 2030, compared to 2019 levels, and 55.40% for Scope 3 in financial intensity (over Gross Value Added, GVA). Both targets were validated by SBTi in April 2024. 4. Time horizons and impact of financial planning: Environmental risks influence both short- and long-term financial planning.

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 stress and drought resulting from high water consumption can adversely affect the surrounding ecosystem and the species that depend on these water sources for their survival. This leads to changes in social or stakeholder perceptions, primarily due to competition for natural resources. Competition for scarce resources such as water, minerals, and land is increasing globally, which can negatively impact the perception of companies that rely on these resources, such as TUBACEX. Concerns about biodiversity loss related to the extraction and use of these resources may arise, particularly if the company is seen as not managing them sustainably or responsibly, thus increasing the risk of reputational damage. With the growing frequency and severity of droughts due to climate change, improving water management and optimizing consumption is essential, especially in regions more vulnerable to water scarcity. In this regard, TUBACEX can implement strategies to reduce water consumption, such as real-time monitoring systems to track water use and detect leaks or waste.
[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)

84451500

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

11

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

11

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

11

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

11

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

89

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

For the calculation of the indicators- according to the analysis carried out- both ACERALAVA´s sales to third parties and sales made by steel trading companies (TSS) will be considered eligible and aligned, in so far as they correspond to an eligible activity (sale of steel) versus other non-eligible activities (sale of other products). To this end, TSS sales have been classified according to the origin of the material, specifically those sourced from ACERALAVA. For sales, the calculation will be carried out based on the following criteria: the share of revenue from eligible activities (numerator) relative to total company revenue (denominator) excluding inter-company sales.

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)

2790000

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

4.42

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

4.42

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

4.42

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

4.42

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

95.58

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

For the calculation of the indicators- according to the analysis carried out- both ACERALAVA´s sales to third parties and sales made by steel trading companies (TSS) will be considered eligible and aligned, in so far as they correspond to an eligible activity (sale of steel) versus other non-eligible activities (other products). To this end, TSS sales have been classified according to the origin of the material, specifically those sourced from ACERALAVA. To calculate CapEx and OpEx, items corresponding to ACERALAVA and the proportion of TSS used for the related activity are considered. For CapEx, calculation will be carried out according to the following criteria: the proportion of fixed assets invested in eligible economic activities (numerator) relative to the total assets acquired in the year 2023 (denominator). This includes the sum of all additions to tangible and intangible assets before depreciation, amortization and any revaluation, including those resulting from business combinations, regardless of the eligibility of the activities.

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)

6418000

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

24.1

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

24.1

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

24.1

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

24.1

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

75.9

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

For the calculation of the indicators, according to the analysis carried out, both ACERALAVA’s sales to third parties and sales made by steel trading companies (TSS) will be considered eligible and aligned, insofar as they correspond to an eligible activity (sale of steel), as opposed to non-eligible activities (other products). To this end, TSS sales have been classified based on the origin of the material, specifically those sourced from ACERALAVA. To calculate CapEx and OpEx, items

corresponding to ACERALAVA and the proportion of TSS used for the related activity are taken into account. For OpEx, the calculation will be carried out according to the following criteria: the ratio of eligible taxonomy-aligned OpEx (numerator) to total taxonomy OpEx (denominator). The denominator includes the aggregation of direct non-capitalised R&D expenses, activity-related costs, maintenance and repair costs, and environmental management costs necessary to ensure the continued efficient operation of assets. These are considered material, regardless of eligibility. Short-term leases for inter-company transactions are excluded.
[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)

84451500

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

11

(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

11

(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)

2790000

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

4.42

(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

4.42

(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)

6418000

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

24.1

(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

24.1

(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

For the calculation of the indicators- according to the analysis carried out- both ACERALAVA´s sales to third parties and sales made by steel trading companies (TSS) will be considered eligible and aligned, in so far as they correspond to an eligible activity (sale of steel) versus other non-eligible activities (other products). For this, the sales of TSS classified according to the origin of the material have been considered, specifically those from ACERALAVA. To calculate CapEx and OpEx, items corresponding to ACERALAVA and the proportion of TSS used for the related activity are considered. To calculate CapEx and OpEx, items corresponding to ACERALAVA and the proportion of TSS used for the related activity are taken into account.

(5.4.2.28) Substantial contribution criteria met

Select from:

☑ Yes

(5.4.2.29) Details of substantial contribution criteria analysis

Following the adoption, on 13 June 2023, of the Delegated Environmental Regulation by the European Commission, which defines complementary activities related to the four remaining environmental objectives (sustainable use of water and marine resources, transition to a circular economy, pollution prevention and control, and protection of biodiversity and ecosystems), TUBACEX has assessed whether its operations fall within the scope of this regulation. After careful analysis, it was concluded that the company's activities do not align with the descriptions provided in the regulatory text and are therefore outside its scope. In line with the criteria established for assessing eligibility, the alignment analysis has focused on the stainless-steel long products manufacturing activity carried out at the Group's steel mill, ACERALAVA, as well as on the products marketed by TSS that originate from this facility. In this context, compliance is supported by the use of electric arc furnaces (EAF) with a scrap content exceeding 70% in the production of stainless steel, taking into account both internal and external scrap relative to the volume of ingots produced.

(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

Consolidated-Non-Financial-information-statement-2024_Tubacex.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 TUBACEX upholds the Universal Declaration of Human Rights, ILO, OECD, and UN Global Compact principles. In December 2023, it launched a new Occupational Safety and Health policy to reduce workforce risks. Its assessed plants are certified under ISO 45001 for occupational risk prevention. Human Rights As a UN Global Compact member, TUBACEX supports its Ten Principles on human rights, labor, environment, and anti-corruption. In 2024, following a 2023 CSRD gap analysis, the company initiated a Human Rights Due Diligence project across all Group entities. This effort includes integrating human rights risk factors—such as supplier type, geographic location, and purchase volume—into supplier approvals. The materiality assessment also addressed potential impacts on indigenous communities, which, though considered minor, are respected through actions led by the TUBACEX Foundation. Anti-Corruption and Bribery TUBACEX enforces strict anti-corruption policies, rejecting all irregular practices and operating with legality and ethics. Its Code of Conduct applies to all business partners and subsidiaries. The Audit and Compliance Commission, under the Board of Directors, ensures compliance with anti-corruption laws and internal rules. Tax Policy Commitment Reinforcing its corporate governance and social responsibility, TUBACEX updated its Corporate Tax Policy in December 2023. The policy aims to manage financial risks, ensure legal compliance, and promote responsible tax behavior, prioritizing adherence to local tax laws and risk prevention. Fair Competition TUBACEX promotes fair and ethical competition, strictly adhering to local and international antitrust regulations. In alignment with its Code of Conduct, it publicly rejects prohibited practices and monitors compliance through an open reporting channel.

(5.4.3.2) Additional contextual information relevant to your taxonomy accounting

Our report on the eligibility and alignment of certain TUBACEX activities with EU taxonomy criteria is included in section 5. Taxonomy, in 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 carried out by the Group's steelworks, ACERÁLAVA (NACE 24.10), as well as products originating from this plant and sold through TSS, TUBACEX´s master distributor (NACE 46.77). In this case, compliance is based on the use of scrap in electric arc furnaces (EAF), where scrap accounts for more than 70% of high-alloy steel production. This report was recently audited by Ernst & Young (EY), who issued a favorable assurance statement 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's ambitious 2030 program is strategically aligned with global decarbonization efforts, incorporating advanced material solutions for CCUS (Carbon Capture, Utilization, and Storage) and hydrogen technologies to help carbon-intensive industries reduce emissions. This initiative represents a significant step toward sustainability, redirecting TUBACEX's investments and expertise to better support industries in reducing their carbon footprint. TUBACEX conducts extensive R&D activity, equivalent to 1% of its annual sales. The company aims to ensure that 80% of total R&D efforts are dedicated to energy transition. Currently, 31% of R&D activities are devoted to this area. Although the resources allocated to the energy transition in 2024 remain consistent with 2023 levels, increased investment in developing new solutions for the gas extraction segment has reduced the proportional share directed toward energy transition. This share is currently lower than anticipated but is expected to rise in 2025. The vast majority of the R & D programme focuses on: A) Design and commercialization of products related to the green economy applicable across all stages of the hydrogen value chain, B) Reduction of CO2 emissions through continuous innovation in materials and processes, such as carbon capture, storage, and use (CCU). C) Advancing the circular economy, by improving production processes through waste reduction or recovery. In addition, TUBACEX actively promotes and accelerates the development of emerging technologies in the energy transition field, adopting an open innovation approach. This includes identifying relevant technology innovators and forming partnerships to support industrialization and scale-up phases, thereby accelerating impact. One example is a waste-to-hydrogen (H_2) project, which has received support from 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:

☑ Low-to-medium temperature heating

(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

31

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

80

(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

TUBACEX´s R&D investments are aligned with its climate commitments and transition plan by focusing on technologies that reduce greenhouse gas emissions and enable the shift towards low-carbon operations. In 2024, TUBACEX continued allocating significant resources to energy transition projects, representing 31% of our total R&D efforts, consistent with 2023 levels. This includes the replacement of the heating system for both production facilities and offices, a project that directly contributes to improved energy efficiency and lower emissions. Key areas of work within R&D portfolio are linked to the green economy, particularly the hydrogen value chain. Projects include green hydrogen production via electrolysis, hydrogen storage, and its use in high-temperature furnaces, all of which support long-term decarbonization of industrial processes. Although the relative share of R&D dedicated to energy transition decreased compared to 2023, this was due to increased investment in high-impact projects within the natural gas extraction segment. Importantly, 62% of innovation efforts overall remain directed towards advancing the energy transition, underscoring our commitment to align R&D activities with our climate transition plan and net-zero objectives.

Row 3

(5.5.5.1) Technology area

Select from:

☑ Efficiency/recovery equipment on existing process plant

(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

31

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

80

(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

TUBACEX's R&D investment in installing LED plant lighting is aligned with its climate commitments by reducing electricity consumption and associated emissions in production and office facilities. This initiative replaces conventional lighting with high-efficiency LED systems, delivering measurable energy savings while improving workplace conditions. The project forms part of TUBACEX's broader R&D efforts dedicated to the energy transition, which accounted for 31% of total R&D in 2024. By improving energy efficiency in auxiliary systems such as lighting, the company ensures that decarbonization is embedded not only in core production processes but also across supporting operations. In addition, TUBACEX's innovation portfolio continues to prioritize projects within the green economy and hydrogen value chain, including green hydrogen production, storage and application in high-temperature furnaces. These areas complement initiatives like LED lighting, together advancing the company's climate transition plan and supporting long-term emissions reduction across operations. Although the share of R&D allocated to the energy transition slightly decreased in 2024 due to significant investments in natural gas extraction projects, 62% of the company's overall innovation efforts remain focused on advancing low-carbon solutions. This reflects the strong alignment of TUBACEX's R&D activities with its net-zero commitments and climate transition roadmap.

Row 4

(5.5.5.1) Technology area

Select from:

☑ High temperature heating

(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

31

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

80

(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

R&D investment in the replacement of the furnace recuperator is aligned with climate transition plan as it directly contributes to improving energy efficiency in high-temperature processes. This initiative reduces fuel consumption and associated greenhouse gas emissions, while also enhancing the overall performance and longevity of production assets. The project is part of TUBACEX´s broader commitment to the energy transition, with 31% of our R&D efforts in 2024 dedicated to low-carbon technologies. Within this context, improving thermal recovery systems represents a key step in decarbonizing energy-intensive operations. In parallel, innovation strategy continues to focus on the green economy and the hydrogen value chain, including projects on green hydrogen production via electrolysis, hydrogen storage and its use in high-temperature furnaces. These areas are complementary to the furnace recuperator replacement, as they support long-term pathways for reducing reliance on fossil fuels in industrial processes. Although the relative share of energy transition R&D decreased in 2024 due to higher investments in natural gas extraction solutions, 62% of our overall innovation efforts remain focused on advancing the energy transition, reflecting the strong alignment of R&D portfolio with climate commitments and decarbonization goals.

Row 5

(5.5.5.1) Technology area

Select from:

☑ Control systems

(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

31

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

80

(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

TUBACEX's R&D investments in monitoring the consumption of heat treatment furnaces, implementing a digital energy control system and installing more energy-efficient air compressors are fully aligned with its climate commitments and transition plan. These initiatives are focused on improving energy efficiency, reducing operational emissions, and integrating digital technologies to optimize industrial processes. In Vittuone, TUBACEX has installed a remotely controlled data monitoring and analysis system with dedicated software on heat treatment furnaces, enabling real-time tracking and optimization of energy use. In parallel, the implementation of a digital energy control system across facilities allows for holistic monitoring and management of energy consumption, while the introduction of more efficient air compressors contributes to significant reductions in electricity demand. Together, these initiatives form part of the 31% of TUBACEX's R&D efforts in 2024 dedicated to the energy transition. They demonstrate how the company is embedding decarbonization not only in core production processes but also in auxiliary systems that are essential to reducing its carbon footprint. At the same time, TUBACEX's innovation portfolio continues to prioritize projects within the green economy and hydrogen value chain, including green hydrogen production, storage and use in high-temperature furnaces. These projects complement energy efficiency initiatives by building long-term alternatives to fossil fuel dependence. Although the relative share of R&D allocated to the energy transition decreased in 2024 due to increased investments in natural gas extraction projects, 62% of the company's overall innovation efforts remain focused on advancing low-carbon solutions. This reflects the strong alignment of TUBACEX's R&D portfolio with its climate transition roadmap and net-zero objectives.

Row 6

(5.5.5.1) Technology area

Select from:

☑ Efficiency/recovery equipment on existing process plant

(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

31

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

80

(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

TUBACEX's R&D investment in the implementation of a digital energy control system is aligned with its climate commitments and transition plan by enabling real-time monitoring and optimization of energy consumption across production and office facilities. This initiative enhances operational efficiency, reduces unnecessary energy use, and contributes directly to lowering greenhouse gas emissions. The project is part of TUBACEX's broader R&D focus on the energy transition, which represented 31% of total R&D investment in 2024. By integrating digital technologies into energy management, the company strengthens its ability to decarbonize not only production processes but also supporting infrastructure. In addition, TUBACEX's innovation portfolio remains focused on the green economy and the hydrogen value chain, including green hydrogen production, storage and application in high-temperature furnaces. These projects complement digital energy control by building a comprehensive pathway towards energy transition and long-term emissions reduction. Although the relative share of R&D allocated to the energy transition decreased in 2024 due to increased investment in natural gas extraction projects, 62% of the company's overall innovation efforts remain dedicated to low-carbon solutions. This demonstrates the strong alignment of TUBACEX's R&D activities with its climate transition roadmap and net-zero commitments.
[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)

28.61

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

71.49

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

0.48

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

0.5

(5.9.5) Please explain

TUBACEX's water-related CAPEX represented 28.61% of the total CAPEX invested in adaptation initiatives and projects during the reporting year. For the next reporting year, planned investments in water adaptation measures are expected to account for 71.49% of the total CAPEX dedicated to general adaptation measures. This reflects an anticipated increase of approximately 43% in capital expenditure allocated to water-related adaptation, demonstrating the company's strategic commitment to enhancing water resilience across its operations. Water-related OPEX accounted for 0.48% of total initiative OPEX in the reporting year, and although currently low, TUBACEX expects it to increase proportionally as new water adaptation measures are implemented, reflecting their ongoing maintenance and management requirements. TUBACEX's commitment to aligning water-related CAPEX and OPEX with its adaptation and sustainability goals.
[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:
☑ Shadow price

(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 and the evolution of prices up to 2030. This method provides a representative and up-to-date value, allowing carbon-related decisions to be consistent with market trends and regulatory policies.

(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)

65

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

135

(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

The internal pricing approach is monitored and evaluated annually to ensure that it meets its objectives. At the end of the year, the impact of carbon pricing on CAPEX decision-making is reviewed. This analysis allows us to verify whether carbon pricing has influenced the prioritization of more sustainable investments and to adjust the internal price system or values (if necessary) to maximize its effectiveness in future exercises.
[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
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:

☑ 51-75%

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

Suppliers are required to provide evidence of their environmental management systems and are subject to an audit plan. The assessment of the environmental impact of the supply chain is based on two key variables: the management system implemented by the supplier and the proximity to the source of supply. Suppliers that achieve the highest scores are considered the least harmful in terms of supply chain sustainability.

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

Select from:

☑ 51-75%

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

913
[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

☑ Vulnerability of suppliers

(5.11.2.4) Please explain

TUBACEX has a dedicated supply chain management process, which is currently being revised to better integrate stakeholder expectations around sustainability and to strengthen the Group's influence over its suppliers in this area. So far, the company has focused on its critical suppliers, those with the greatest impact on spending, business continuity, and climate, to reduce supply chain risks and lower its overall carbon footprint. Critical suppliers are selected based on four main criteria: (1) compliance with regulatory requirements, (2) adherence to the TUBACEX Code of Conduct, (3) mitigation of supply risks (including ESG, financial, and geographical factors), and (4) the carbon footprint of the products supplied. As part of its ongoing review, TUBACEX is refining its supplier evaluation approach to reflect industry-specific social, environmental, and governance standards. The updated process will target suppliers where the company can have the most influence, supported by a continuous improvement loop involving feedback and corrective actions to enhance sustainability across the supply chain.
[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 include a clause that addresses non-compliance with ESG practices. Failure to comply with the Code of Conduct may result in the termination of the contract. In addition to the Code of Conduct for Suppliers, TUBACEX has a Compliance Plan that outlines the requirements mandated by local legislation in regions where TUBACEX has production and/or marketing activities. One of the key aspects of the annual compliance plan is the verification and homogenization of local compliance requirements across the various jurisdictions where the company has production and/or marketing activities. If the supplier, or any party acting on its behalf and, on its behalf, violates this clause, TUBACEX may terminate all contracts with the supplier or its group companies. 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%

(5.11.6.12) Comment

TUBACEX has a dedicated supply chain management system that is currently being revised to align with stakeholder expectations regarding sustainability and to strengthen the company's influence over its supply chain in this area. As part of this process, suppliers with the highest turnover or those considered critical in terms of social, environmental, or governance impact will be assessed and audited using both sector-specific and company-specific criteria to evaluate their sustainability performance and risk level. The process will include a continuous improvement cycle, providing feedback and recommendations to suppliers, thereby enhancing TUBACEX's ability to drive sustainability throughout its supply chain. This approach will be integrated into existing supplier management tools, such as the supplier portal, which, since 2019 has improved visibility into suppliers' sustainability performance, focusing on those with the best results. This year, TUBACEX began defining policies and procedures to manage cases where suppliers do not comply with the sustainability requirements outlined in the TUBACEX Code of Conduct and related policies. These measures will allow for the reporting of non-compliance and enable TUBACEX to take corrective action effectively and proactively. The company also continues to strengthen its procedures to ensure that any incidents are properly managed.

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:

☑ 76-99%

(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:

☑ 26-50%

(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 dedicated supply chain management system, currently under revision to align with stakeholder expectations and to strengthen the company's influence over its supply chain. Suppliers with the highest turnover or critical in terms of social, environmental, or governance impact will be assessed and audited using sector-specific and company-specific criteria to evaluate their sustainability performance and risk level. The process includes a continuous improvement cycle, offering feedback and recommendations to enhance supplier performance. This approach is integrated into existing tools, such as the supplier portal, which since 2019 has improved visibility into suppliers' sustainability performance, prioritizing those with the best results. In 2024, 913 suppliers were evaluated (up from 829 in 2023, 801 in 2022 and 774 in 2021), representing 87.75% of total expenditure. 100% of these suppliers completed a questionnaire about their environmental management model, which has been used to create a specific rating. The evaluation criteria have been expanded to include sustainability aspects (environment, human rights, child labour, safety and health...). This process raises awareness among suppliers about the importance of sustainability and their role in its development. The questionnaire also triggers alerts in cases where a critical question receives an inadequate response, ensuring that all suppliers meet ESG standards aligned with TUBACEX's needs.

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 dedicated supply chain management system, currently under revision to align with stakeholder expectations and to strengthen the company's influence over its supply chain. Suppliers with the highest turnover or critical in terms of social, environmental, or governance impact will be assessed and audited using sector-specific and company-specific criteria to evaluate their sustainability performance and risk level. The process includes a continuous improvement cycle, offering feedback and recommendations to enhance supplier performance. This approach is integrated into existing tools, such as the supplier portal, which since 2019 has improved visibility into suppliers' sustainability performance, prioritizing those with the best results. In 2024, 913 suppliers were evaluated (up from 829 in 2023, 801 in 2022 and 774 in 2021), representing 87.75% of total expenditure. 100% of these suppliers completed a questionnaire about their environmental management model, which has been used to create a specific rating. The evaluation criteria have been expanded to include sustainability aspects (environment, human rights, child labour, safety and health...). This process raises awareness among suppliers about the importance of sustainability and their role in its development. The questionnaire also triggers alerts in cases where a critical question receives an inadequate response, ensuring that all suppliers meet ESG standards aligned with TUBACEX's needs.
[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:

☑ Adoption of the United Nation's International Labour Organization principles

(5.11.7.3) Type and details of engagement

Information collection

☑ Other information collection activity, please specify :Implement a supplier screening process that assesses and evaluates their ESG performance through structured criteria and analysis.

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☑ 76-99%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☑ 51-75%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

We require our suppliers to align with the core International Labour Organization (ILO) labour standards, which include the elimination of forced and child labour, the right to collective bargaining, and non-discrimination in employment. This framework establishes minimum expectations that link social responsibility directly to environmental performance, since fair labour practices support safer, more sustainable production processes. Effect: Embedding these principles has improved supplier accountability and created a baseline for environmental and social compliance. Suppliers are increasingly reporting on both their environmental performance and their adherence to decent work standards, which fosters a culture of responsibility throughout our supply chain.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ Yes, please specify the environmental requirement :A positive evaluation of the supplier

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Yes

Water

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ No, this engagement is unrelated to meeting an environmental requirement

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Upstream value chain transparency and human rights

(5.11.7.3) Type and details of engagement

Information collection

☑ Collect environmental risk and opportunity information at least annually from suppliers

☑ Other information collection activity, please specify :Implement a supplier screening process that assesses and evaluates their ESG performance through structured criteria and analysis.

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☑ 76-99%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☑ 51-75%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

We actively promote transparency in the upstream value chain by encouraging suppliers to disclose their environmental impacts, and human rights approach. Effect: This engagement has enhanced our ability to identify and address environmental risks at earlier stages of the value chain. It has also fostered collaboration with suppliers to implement corrective actions and sustainability initiatives, leading to measurable improvements in resource efficiency, reduced emissions, and strengthened respect for human rights.

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☑ Yes, please specify the environmental requirement :A positive evaluation of the supplier

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☑ Yes

[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 recognizes the importance of tracking our climate impact and is committed to helping our customers calculate their own climate impact. Climate-related information is publicly shared and available to all customers, regardless of their purchase volume or sector. In the operational area, TUBACEX is driving the development of stainless-steel solutions through energy and emission efficient processes, implementing strategies that minimize environmental impact while actively contributing to the decarbonization of customers. Additionally, TUBACEX leverages its technological capacity to develop innovative solutions that support the energy transition and facilitate the shift toward climate change mitigation. Regarding the downstream value chain, in 2024 TUBACEX initiated an assessment of our key customers to understand their sustainability practices and evaluate their risk levels regarding potential human rights violations. Customers with the highest turnover have been categorized based on customer type and geographical location, allowing us to identify those who may present a higher risk of social and environmental rights violations. The analysis is complemented by an in-depth review of their management plans through publicly available information, helping to define their inherent risk levels and assess their environmental, social, and governance (ESG) commitments. This analysis is set to continue throughout 2025, with new parameters and study methodologies being incorporated. This year, adopting a more collaborative approach with certain clients has allowed us to share best practices in sustainability and assess the alignment of objectives pursued by both parties.

(5.11.9.6) Effect of engagement and measures of success

By openly sharing our climate-related data and supporting clients in assessing their environmental impact, TUBACEX strengthens long-term strategic partnerships. As customers increasingly seek ways to reduce their carbon footprint, they depend on transparent access to relevant information. This often leads to collaboration in the co-development of advanced, value-driven solutions, an approach that aligns with our commitment to open innovation. A clear example is our work on customized

solutions that address industry-specific challenges in energy efficiency, both within traditional energy sectors and in emerging fields linked to new energy technologies.

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 is firmly rooted in transparency, especially in the disclosure of climate-related information. In addition to clients and suppliers, the company is committed to sharing this data with a broad range of stakeholders across the value chain. As demand for climate disclosures has grown, particularly from

banks and project financiers, TUBACEX has consistently provided the necessary information to foster trust and strengthen strategic relationships. The company actively participates in initiatives that support the energy transition, promoting collaborative models that enable shared learning and technological synergy. This includes engagement in industry associations, participation in energy transition clusters, and partnerships with start-ups to explore innovative business and technology models.

(5.11.9.6) Effect of engagement and measures of success

TUBACEX evaluates the effectiveness of its engagement in associations and collaborative initiatives through both qualitative and quantitative measures. Success is reflected in the company's ability to: Strengthen stakeholder trust: By providing transparent and consistent climate-related disclosures, TUBACEX has observed increased recognition from financial institutions, industry peers, and customers, who rely on this information for decision-making. Influence sectoral progress: Participation in industry associations and energy transition clusters enables TUBACEX to contribute to collective roadmaps, regulatory dialogues, and best practice sharing, which enhance the sector's overall alignment with decarbonization pathways. Drive innovation outcomes: Collaborations with start-ups and research partners have led to the development of new business and technology models, with measurable outputs such as pilot projects, joint research papers, and technology adoption rates. Expand partnerships: Growth in the number and diversity of associations, clusters, and collaborative agreements in which TUBACEX participates serves as a proxy for the success of its engagement strategy. Support long-term business resilience: Ultimately, success is measured by the ability of these partnerships to accelerate the company's energy transition roadmap, reduce climate-related risks, and unlock opportunities in low-carbon markets.

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

The shareholders support TUBACEX's business project and their trust are key. Responding to their interests and building trust through long-lasting and stable relationships is TUBACEX´s priority with this group. The finance team also maintains permanent, transparent and stable relationships with other groups such as banks, investors and analysts, who represent access to sources of funding for clients. TUBACEX regularly shares information about its decarbonization plan and emission reduction plan. This information is highlighted in its quarterly earnings reports.

(5.11.9.6) Effect of engagement and measures of success

TUBACEX recognizes the importance of identifying and managing climate change risks and opportunities, integrating them into both its strategic and operational decisions. This proactive management allows the company to strengthen relationships with your stakeholders, access sustainable financing and improve the efficiency of its processes. To support this approach, the company continuously monitors critical risks and implements adaptation and mitigation measures based on key indicators such as water consumption and CO2 emissions. An example of this is the annual reporting of its Scope 1, 2 and 3 emissions, as well as its firm commitment to reduction in line with international climate targets.
[Add row]

(5.12) Indicate any mutually beneficial environmental initiatives you could collaborate on with specific CDP Supply Chain members.

Row 1

(5.12.1) Requesting member

Select from:

☑ Schlumberger Limited

(5.12.2) Environmental issues the initiative relates to

Select all that apply

☑ Climate change

(5.12.4) Initiative category and type

Innovation

☑ New product or service that reduces customers' products/services operational emissions

(5.12.5) Details of initiative

Co-designing tubular solutions with reduced embedded emissions, for example through increased use of recycled steel and adoption of green energy in manufacturing, directly supporting clients' Scope 3 reduction targets.

(5.12.6) Expected benefits

Select all that apply

☑ Reduction of downstream value chain emissions (own scope 3)

(5.12.7) Estimated timeframe for realization of benefits

Select from:

☑ 1-3 years

(5.12.8) Are you able to estimate the lifetime CO2e and/or water savings of this initiative?

Select from:

☑ No

(5.12.11) Please explain

At present, TUBACEX is not yet able to quantify the exact reduction in greenhouse gas emissions resulting from collaborative initiatives with clients. Despite these challenges, TUBACEX is actively working on developing the capability to measure such impacts. This includes: Enhancing internal systems for carbon accounting and product-level life cycle assessment (LCA). Engaging with industry associations and clients to co-create methodologies for measuring shared emission reductions. Exploring digital tools that enable better traceability and transparency of environmental data across the supply chain. Our objective is to move from qualitative to quantitative reporting in the near future,

Row 2

(5.12.1) Requesting member

Select from:

☑ Petróleo Brasileiro SA - Petrobras

(5.12.2) Environmental issues the initiative relates to

Select all that apply

☑ Climate change

(5.12.4) Initiative category and type

Innovation

☑ New product or service that reduces customers' products/services operational emissions

(5.12.5) Details of initiative

Co-designing tubular solutions with reduced embedded emissions, for example through increased use of recycled steel and adoption of green energy in manufacturing, directly supporting clients' Scope 3 reduction targets.

(5.12.6) Expected benefits

Select all that apply

☑ Reduction of downstream value chain emissions (own scope 3)

(5.12.7) Estimated timeframe for realization of benefits

Select from:

☑ 1-3 years

(5.12.8) Are you able to estimate the lifetime CO2e and/or water savings of this initiative?

Select from:

☑ No

(5.12.11) Please explain

At present, TUBACEX is not yet able to quantify the exact reduction in greenhouse gas emissions resulting from collaborative initiatives with clients. Despite these challenges, TUBACEX is actively working on developing the capability to measure such impacts. This includes: Enhancing internal systems for carbon accounting and product-level life cycle assessment (LCA). Engaging with industry associations and clients to co-create methodologies for measuring shared emission reductions. Exploring digital tools that enable better traceability and transparency of environmental data across the supply chain. Our objective is to move from qualitative to quantitative reporting in the near future,
[Add row]

(5.13) Has your organization already implemented any mutually beneficial environmental initiatives due to CDP Supply Chain member engagement?

(5.13.1) Environmental initiatives implemented due to CDP Supply Chain member engagement

Select from:

☑ No, but we plan to within the next two years

(5.13.2) Primary reason for not implementing environmental initiatives

Select from:

☑ Other, please specify :Formal projects directly linked to CDP engagement are still under development.

(5.13.3) Explain why your organization has not implemented any environmental initiatives

TUBACEX has not yet implemented mutually beneficial environmental initiatives specifically as a result of CDP Supply Chain member engagement. The main reason is that while the company actively collaborates with clients and suppliers on sustainability topics, formal projects directly linked to CDP engagement are still under development. However, TUBACEX is committed to advancing this type of collaboration. We are currently: Strengthening our internal methodologies to better quantify the environmental impact of joint initiatives. Exploring potential projects with supply chain partners focused on decarbonization, circularity, and energy efficiency. Participating in industry associations and clusters that will provide a framework for launching such initiatives in collaboration with CDP members. Our intention is to translate these discussions into concrete projects in the near future, ensuring measurable benefits for both TUBACEX and CDP Supply Chain partners.
[Fixed 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

TUBACEX compiles environmental data from all its facilities on a monthly basis, covering key aspects such as energy consumption, water usage, raw materials, waste generation, and more. This process is supported by a digital tool that allows us to monitor indicators by plant and by month, ensuring accuracy and traceability. Our consolidation approach is fully aligned with financial reporting standards, providing consistency and reliability across the organization.

Water

(6.1.1) Consolidation approach used

Select from:

☑ Operational control

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

TUBACEX compiles environmental data from all its facilities on a monthly basis, covering key aspects such as energy consumption, water usage, raw materials, waste generation, and more. This process is supported by a digital tool that allows us to monitor indicators by plant and by month, ensuring accuracy and traceability. Our consolidation approach is fully aligned with financial reporting standards, providing consistency and reliability across the organization.

Plastics

(6.1.1) Consolidation approach used

Select from:

☑ Other, please specify :Not deemed material

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

Not deemed material

Biodiversity

(6.1.1) Consolidation approach used

Select from:

☑ Other, please specify :Not deemed material

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

Not deemed material
[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?

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply ☑ No

[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 not relevant

(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 2

(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

(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. For the Spanish plants, the 2024 emission factor published by Redeia is applied. This factor is derived from the average of the monthly emission factors associated with electricity generation in the national system, considering all technologies involved. For the remaining plants, the emission factor provided by the IPCC is used.

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

Emissions are calculated from actual electricity consumption and the corresponding emission factors. The electricity mix emission factor is applied in both the location-based and market-based approaches. In addition, under the market-based method, Guarantees of Origin (GdOs) are considered for each plant where available.

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

A hybrid approach is applied, using purchased goods data (weight or volume) combined with standard emission factors from Ecoinvent 3.8 and sector-specific sources.

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

A spend-based approach is applied, multiplying CAPEX by CNAEs emission factors.

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

Quantities used for Scope 1 and 2 calculations are multiplied by the corresponding 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

Transport data are recorded based on volumes and estimated distances, and multiplied by specific emission factors for each transport mode.

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 are multiplied by emission factors from DEFRA

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

A spend-based approach is applied, using DEFRA emission factors for business travel.

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

Transport data are recorded based on volumes and distances, and multiplied by specific emission factors for each transport mode from DEFRA.

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 used the emission factors from our most 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)

0

(7.5.3) Methodological details

We have modeled the key markets where our products are sold, as well as the reverse supply chains that enable us to reuse products as scrap in our steel mill. This information will be reported in the coming years once the data has been verified. Current estimates indicate that these emissions account for a low share of the total (less than 1%).

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)

49327.02

(7.6.3) Methodological details

Emissions are calculated based on actual fuel consumption at each site, applying the corresponding emission factors for each fuel as published by the Spanish Ministry of Industry. In addition, direct process emissions are included, calculated from actual consumption and the appropriate emission factors according to material composition. All greenhouse gases are converted into CO_2e using the relevant Global Warming Potential (GWP) values.

Past year 1

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

48612

(7.6.2) End date

12/30/2023

(7.6.3) Methodological details

Emissions are calculated based on actual fuel consumption at each site, applying the corresponding emission factors for each fuel as published by the Spanish Ministry of Industry. In addition, direct process emissions are included, calculated from actual consumption and the appropriate emission factors according to material composition. All greenhouse gases are converted into CO_2e using the relevant Global Warming Potential (GWP) values.

Past year 2

(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

Emissions are calculated based on actual fuel consumption at each site, applying the corresponding emission factors for each fuel as published by the Spanish Ministry of Industry. In addition, direct process emissions are included, calculated from actual consumption and the appropriate emission factors according to material composition. All greenhouse gases are converted into CO_2e using the relevant Global Warming Potential (GWP) values.

Past year 3

(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

Emissions are calculated based on actual fuel consumption at each site, applying the corresponding emission factors for each fuel as published by the Spanish Ministry of Industry. In addition, direct process emissions are included, calculated from actual consumption and the appropriate emission factors according to material composition. All greenhouse gases are converted into CO_2e using the relevant Global Warming Potential (GWP) values.

Past year 4

(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

Emissions are calculated based on actual fuel consumption at each site, applying the corresponding emission factors for each fuel as published by the Spanish Ministry of Industry. In addition, direct process emissions are included, calculated from actual consumption and the appropriate emission factors according to material composition. All greenhouse gases are converted into CO_2e using the relevant Global Warming Potential (GWP) values.

Past year 5

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

67340.08

(7.6.2) End date

03/10/2019

(7.6.3) Methodological details

Emissions are calculated based on actual fuel consumption at each site, applying the corresponding emission factors for each fuel as published by the Spanish Ministry of Industry. In addition, direct process emissions are included, calculated from actual consumption and the appropriate emission factors according to material composition. All greenhouse gases are converted into CO_2e using the relevant Global Warming Potential (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)

42765

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

14571

(7.7.4) Methodological details

Due to limited data availability in some countries, the market-based figure results in a mixed approach, as both location-based and market-based emission factors are applied. A market-based approach is specifically used for Spain, Austria, the USA, Norway, and Italy. For both approaches, emissions are calculated from actual electricity consumption and the corresponding emission factors. The electricity mix emission factor is applied under both the location-based and market-based methods, except in Spain, where the supplier is Repsol. Under the market-based method, Guarantees of Origin (GdOs) are additionally considered for each plant.

Past year 1

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

42645

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

14506

(7.7.3) End date

12/30/2023

(7.7.4) Methodological details

Due to limited data availability in some countries, the market-based figure results in a mixed approach, as both location-based and market-based emission factors are applied. A market-based approach is specifically used for Spain, Austria, the USA, Norway, and Italy. For both approaches, emissions are calculated from actual

electricity consumption and the corresponding emission factors. The electricity mix emission factor is applied under both the location-based and market-based methods, except in Spain, where the supplier is Repsol. Under the market-based method, Guarantees of Origin (GdOs) are additionally considered for each plant.

Past year 2

(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)

16361.12

(7.7.3) End date

12/30/2022

(7.7.4) Methodological details

Due to limited data availability in some countries, the market-based figure results in a mixed approach, as both location-based and market-based emission factors are applied. For both approaches, emissions are calculated from actual electricity consumption and the corresponding emission factors. The electricity mix emission factor is applied under both the location-based and market-based methods. Under the market-based method, Guarantees of Origin (GdOs) are additionally considered for those plants where they are available.

Past year 3

(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)

18107.97

(7.7.3) End date

12/30/2021

(7.7.4) Methodological details

Due to limited data availability in some countries, the market-based figure results in a mixed approach, as both location-based and market-based emission factors are applied. For both approaches, emissions are calculated from actual electricity consumption and the corresponding emission factors. The electricity mix emission factor is applied under both the location-based and market-based methods. Under the market-based method, Guarantees of Origin (GdOs) are additionally considered for those plants where they are available.

Past year 4

(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)

21398.94

(7.7.3) End date

12/30/2020

(7.7.4) Methodological details

Due to limited data availability in some countries, the market-based figure results in a mixed approach, as both location-based and market-based emission factors are applied. For both approaches, emissions are calculated from actual electricity consumption and the corresponding emission factors. The electricity mix emission factor is applied under both the location-based and market-based methods. Under the market-based method, Guarantees of Origin (GdOs) are additionally considered for those plants where they are available.

Past year 5

(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)

72789.76

(7.7.3) End date

12/30/2019

(7.7.4) Methodological details

Due to limited data availability in some countries, the market-based figure results in a mixed approach, as both location-based and market-based emission factors are applied. For both approaches, emissions are calculated from actual electricity consumption and the corresponding emission factors. The electricity mix emission factor is applied under both the location-based and market-based methods. Under the market-based method, Guarantees of Origin (GdOs) are additionally considered for those plants where they are available.
[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)

246945

(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 goods consumptions (weight, volume, spent) 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)

25412

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average 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)

27592

(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)

7212

(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)

92

(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)

490

(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

It is expected to represent less than 0,1% of the total. Planned to include in coming years.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

IT does not apply to the operations performed by Tubacex.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Relevant, not yet calculated

(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)

3078

(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) multiplied 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:

☑ Not relevant, explanation provided

(7.8.5) Please explain

It is estimated to account for less than 1% of Scope 3 emissions. However, we already have the model in place, and it will be incorporated into our carbon footprint reporting in 2025.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

It is not applicable.

Franchises

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

It is not applicable.

Investments

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

It is not applicable.

Other (upstream)

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

It is not applicable.

Other (downstream)

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

It is 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

12/30/2023

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

296390

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

32378.16

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

26957

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

6748

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

94.58

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

311

(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)

3000

(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)

0

(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

12/30/2022

(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)

0

(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 3

(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)

0

(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)

0

(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 facilities.

Past year 4

(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)

0

(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)

0

(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 5

(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)

34811.43

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

1227

(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)

0

(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)

0

(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

Consolidated-Non-Financial-information-statement-2024_Tubacex.pdf

(7.9.1.5) Page/section reference

1-8

(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

Consolidated-Non-Financial-information-statement-2024_Tubacex.pdf

(7.9.2.6) Page/ section reference

1-8

(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

Consolidated-Non-Financial-information-statement-2024_Tubacex.pdf

(7.9.2.6) Page/ section reference

1-8

(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: Use of sold products
☑ Scope 3: Processing of sold products
☑ Scope 3: Purchased goods and services
☑ Scope 3: Waste generated in operations
☑ Scope 3: Upstream 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

Consolidated-Non-Financial-information-statement-2024_Tubacex.pdf

(7.9.3.6) Page/section reference

1-8

(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:

☑ Increased

(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)

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

Other emissions reduction activities

(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

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

No change

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

No change

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

No change

Change in output

(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

Change in methodology

(7.10.1.1) Change in emissions (metric tons CO2e)

234

(7.10.1.2) Direction of change in emissions

Select from:

☑ Increased

(7.10.1.3) Emissions value (percentage)

30

(7.10.1.4) Please explain calculation

Tubacex has included a new plant in the CDP report and in the accounting of its emissions, this one belonging to SBER Group.

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

No change

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

No change

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

No change

Other

(7.10.1.1) Change in emissions (metric tons CO2e)

546

(7.10.1.2) Direction of change in emissions

Select from:
☑ Increased

(7.10.1.3) Emissions value (percentage)

70

(7.10.1.4) Please explain calculation

Increase in natural gas consumption.
[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)

49278.47

(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:
☑ CH4

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

24.71

(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:
☑ N2O

(7.15.1.2) Scope 1 emissions (metric tons of CO2e)

23.83

(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)

3582.84

(7.16.2) Scope 2, location-based (metric tons CO2e)

3729.08

(7.16.3) Scope 2, market-based (metric tons CO2e)

12.81

Brazil

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

9.33

(7.16.3) Scope 2, market-based (metric tons CO2e)

3.74

Canada

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

81.69

(7.16.3) Scope 2, market-based (metric tons CO2e)

307.72

France

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

5.13

(7.16.3) Scope 2, market-based (metric tons CO2e)

0.7

Guyana

(7.16.1) Scope 1 emissions (metric tons CO2e)

106.31

(7.16.2) Scope 2, location-based (metric tons CO2e)

15.12

(7.16.3) Scope 2, market-based (metric tons CO2e)

13.39

India

(7.16.1) Scope 1 emissions (metric tons CO2e)

3639.04

(7.16.2) Scope 2, location-based (metric tons CO2e)

2043.84

(7.16.3) Scope 2, market-based (metric tons CO2e)

8238.77

Italy

(7.16.1) Scope 1 emissions (metric tons CO2e)

1529.49

(7.16.2) Scope 2, location-based (metric tons CO2e)

1156.66

(7.16.3) Scope 2, market-based (metric tons CO2e)

1105.19

Kazakhstan

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

0

(7.16.3) Scope 2, market-based (metric tons CO2e)

0

Norway

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

433

(7.16.3) Scope 2, market-based (metric tons CO2e)

10.95

Saudi Arabia

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

356.5

(7.16.3) Scope 2, market-based (metric tons CO2e)

1054.5

Singapore

(7.16.1) Scope 1 emissions (metric tons CO2e)

0

(7.16.2) Scope 2, location-based (metric tons CO2e)

3.1

(7.16.3) Scope 2, market-based (metric tons CO2e)

54.55

Spain

(7.16.1) Scope 1 emissions (metric tons CO2e)

37996.4

(7.16.2) Scope 2, location-based (metric tons CO2e)

30140.02

(7.16.3) Scope 2, market-based (metric tons CO2e)

32.32

Thailand

(7.16.1) Scope 1 emissions (metric tons CO2e)

505.18

(7.16.2) Scope 2, location-based (metric tons CO2e)

7.98

(7.16.3) Scope 2, market-based (metric tons CO2e)

504.07

United Arab Emirates

(7.16.1) Scope 1 emissions (metric tons CO2e)

42.65

(7.16.2) Scope 2, location-based (metric tons CO2e)

359.57

(7.16.3) Scope 2, market-based (metric tons CO2e)

847.07

United States of America

(7.16.1) Scope 1 emissions (metric tons CO2e)

1926.59

(7.16.2) Scope 2, location-based (metric tons CO2e)

4424.04

(7.16.3) Scope 2, market-based (metric tons CO2e)

2385.22
[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	*Steel*	*29340.95*
Row 2	*Extrusion*	*12170.9*
Row 4	*Tubacex Advanced Solutions*	*65.92*
Row 5	*Americas*	*1878.19*
Row 6	*Asia*	*3639.04*
Row 7	*Special Components*	*2232.02*

[Add row]

(7.17.2) Break down your total gross global Scope 1 emissions by business facility.

Row 1

(7.17.2.1) Facility

ACVA - AMURRIO

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

29340.95

(7.17.2.3) Latitude

43.034558

(7.17.2.4) Longitude

-3

Row 2

(7.17.2.1) Facility

TTI - AMURRIO

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

5724.43

(7.17.2.3) Latitude

43.037083

(7.17.2.4) Longitude

-3

Row 3

(7.17.2.1) Facility

TDI - DURANT

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

208.3

(7.17.2.3) Latitude

33.97

(7.17.2.4) Longitude

-96.37

Row 4

(7.17.2.1) Facility

IBF - VITTUONE

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

569.21

(7.17.2.3) Latitude

45.49

(7.17.2.4) Longitude

9.63

Row 6

(7.17.2.1) Facility

TTI - LLODIO

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

2865.1

(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)

44.59

(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)

3.53

(7.17.2.3) Latitude

31.87

(7.17.2.4) Longitude

-102.26

Row 10

(7.17.2.1) Facility

NTS - DUBAI

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

42.65

(7.17.2.3) Latitude

24.97

(7.17.2.4) Longitude

55.07

Row 11

(7.17.2.1) Facility

SALEM - GREENVILLE

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

1669.89

(7.17.2.3) Latitude

41.36

(7.17.2.4) Longitude

-80.41

Row 12

(7.17.2.1) Facility

SBT - TERNITZ

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

87.33

(7.17.2.3) Latitude

47.71

(7.17.2.4) Longitude

16.04

Row 13

(7.17.2.1) Facility

TBX SERVICES - OREJO

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

65.92

(7.17.2.3) Latitude

43.4

(7.17.2.4) Longitude

-3.74

Row 15

(7.17.2.1) Facility

TTP - INDIA - UMBERGAON

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

3639.04

(7.17.2.3) Latitude

20.18

(7.17.2.4) Longitude

72.78

Row 16

(7.17.2.1) Facility

IBF-PIACENZA

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

960.28

(7.17.2.3) Latitude

45.49

(7.17.2.4) Longitude

9.63

Row 19

(7.17.2.1) Facility

NTS - GUYANA

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

106.31

(7.17.2.3) Latitude

6.77

(7.17.2.4) Longitude

-58.15

Row 21

(7.17.2.1) Facility

NTS - HOUSTON

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0.28

(7.17.2.3) Latitude

29.99

(7.17.2.4) Longitude

-95.38

Row 26

(7.17.2.1) Facility

SBER - TERNITZ

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

3494.03

(7.17.2.3) Latitude

47.71

(7.17.2.4) Longitude

16.04

Row 29

(7.17.2.1) Facility

TAT - SAMUT PRAKAN

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

505.18

(7.17.2.3) Latitude

13.58

(7.17.2.4) Longitude

100.65

Row 30

(7.17.2.1) Facility

NTS Oklahoma

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

33.99

(7.17.2.4) Longitude

-96.37

Row 31

(7.17.2.1) Facility

NTS - CANADA

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

53.29

(7.17.2.4) Longitude

-113.53

Row 32

(7.17.2.1) Facility

NTS - SINGAPORE

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

1.45

(7.17.2.4) Longitude

103.8

Row 33

(7.17.2.1) Facility

PROMET

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

58.93

(7.17.2.4) Longitude

5.6

Row 34

(7.17.2.1) Facility

NTS - DAMMAM

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

26.24

(7.17.2.4) Longitude

49.99

Row 35

(7.17.2.1) Facility

TSS NORWAY

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

58.89

(7.17.2.4) Longitude

5.74

Row 36

(7.17.2.1) Facility

TSS - AMBROSERO

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

43.42

(7.17.2.4) Longitude

-3.53

Row 37

(7.17.2.1) Facility

TSS AUSTRIA

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

47.71

(7.17.2.4) Longitude

16.04

Row 38

(7.17.2.1) Facility

TSS BRASIL

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

-23.59

(7.17.2.4) Longitude

-46.88

Row 39

(7.17.2.1) Facility

TSS FRANCE

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

45.67

(7.17.2.4) Longitude

5.11

Row 40

(7.17.2.1) Facility

TSS INDIA - GUJARAT

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

23.03

(7.17.2.4) Longitude

70.13

Row 41

(7.17.2.1) Facility

TSS ES - AMURRIO

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

43.03

(7.17.2.4) Longitude

-3

Row 42

(7.17.2.1) Facility

TTA - ARTZINIEGA

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

43.12

(7.17.2.4) Longitude

-3.12

Row 43

(7.17.2.1) Facility

TAI - HOUSTON

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

29.99

(7.17.2.4) Longitude

-95.38

Row 44

(7.17.2.1) Facility

TTP - INDIA - UMBERGAON

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

20.18

(7.17.2.4) Longitude

72.78

Row 45

(7.17.2.1) Facility

TXUT - DERIO 702

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

43.3

(7.17.2.4) Longitude

-2.87

Row 46

(7.17.2.1) Facility

TXUT TRADING - ABU DHABI

(7.17.2.2) Scope 1 emissions (metric tons CO2e)

0

(7.17.2.3) Latitude

23.67

(7.17.2.4) Longitude

54
[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*	*19792.23*
Row 2	*Iron & Steel*	*29340.95*
Row 3	*Vehicles & machinery rental & leasing*	*193.83*

[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	*29349.95*	*Scope 1 activities*

[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	*Steel*	*18962.09*	*0*
Row 2	*Extrusion*	*14433.12*	*0*
Row 4	*Tubacex Advanced Solutions*	*553.06*	*58.39*
Row 6	*Asia*	*2042.32*	*8235.99*
Row 7	*Special Components*	*3159.55*	*4682.63*
Row 8	*Americas*	*3614.06*	*1596.68*

[Add row]

(7.20.2) Break down your total gross global Scope 2 emissions by business facility.

Row 1

(7.20.2.1) Facility

ACVA - AMURRIO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

18962.09

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 2

(7.20.2.1) Facility

TTI - AMURRIO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

1639.6

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 3

(7.20.2.1) Facility

TDI - DURANT

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

694.18

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

1577.44

Row 4

(7.20.2.1) Facility

IBF - PIACENZA

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

291.08

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

551.14

Row 5

(7.20.2.1) Facility

IBF - VITTUONE

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

865.58

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

553.74

Row 6

(7.20.2.1) Facility

TTI - LLODIO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

9115.53

(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)

117.6

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

128.42

Row 8

(7.20.2.1) Facility

NTS - GUYANA

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

15.12

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

13.39

Row 9

(7.20.2.1) Facility

NTS - ODESSA

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

96.84

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

93.21

Row 10

(7.20.2.1) Facility

NTS - CANADA

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

81.69

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

307.72

Row 11

(7.20.2.1) Facility

NTS - HOUSTON

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

594.69

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

566.92

Row 13

(7.20.2.1) Facility

NTS - SINGAPORE

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

3.1

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

54.55

Row 14

(7.20.2.1) Facility

NTS - DUBAI

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

357.61

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

844.93

Row 15

(7.20.2.1) Facility

PROMET - TANANGER

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

366.02

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

9.75

Row 17

(7.20.2.1) Facility

NTS - DAMMAM

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

356.5

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

1053.81

Row 18

(7.20.2.1) Facility

SALEM - GREENVILLE

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

2912.79

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 19

(7.20.2.1) Facility

SBER - TERNITZ

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

2251.11

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 20

(7.20.2.1) Facility

SBT - TERNITZ

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

1426.87

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 21

(7.20.2.1) Facility

TBX SERVICES - OREJO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

178.61

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 22

(7.20.2.1) Facility

TAT - SAMUT PRAKAN

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

7.98

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

503.54

Row 23

(7.20.2.1) Facility

TSS ES - AMBROSERO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

81.55

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

34.51

Row 24

(7.20.2.1) Facility

TSS NW - STAVANGER

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

66.97

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

1.2

Row 25

(7.20.2.1) Facility

TSS AT - TERNITZ

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

51.1

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

13.34

Row 26

(7.20.2.1) Facility

TSS BR - SAO PAULO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

9.33

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

3.74

Row 27

(7.20.2.1) Facility

TSS FR - SATOLAS-ET-BONCE

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

5.13

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0.7

Row 28

(7.20.2.1) Facility

TSS INDIA - GUJARAT

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

1.52

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

2.78

Row 29

(7.20.2.1) Facility

NTS - DUBAI

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

1.96

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

2.15

Row 31

(7.20.2.1) Facility

TSS ES - AMURRIO

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

156.89

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 32

(7.20.2.1) Facility

TTA - ARTZINIEGA

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

5.74

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

0

Row 33

(7.20.2.1) Facility

TAI - HOUSTON

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

7.94

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

18.05

Row 34

(7.20.2.1) Facility

TTP - INDIA - UMBERGAON

(7.20.2.2) Scope 2, location-based (metric tons CO2e)

2042.32

(7.20.2.3) Scope 2, market-based (metric tons CO2e)

8235.99
[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*	*18962.09*	*0*
Row 2	*Metal Processing*	*21528.23*	*11514.36*
Row 3	*Metals supply, wholeshale & trading*	*382.4*	*76.46*
Row 4	*Vehicles & machinery rental & leasing*	*1892.33*	*2980.18*

[Add row]

(7.21) Break down your organization’s total gross global Scope 2 emissions by sector production activity in metric tons CO2e.

Steel production activities

(7.21.1) Scope 2, location-based, metric tons CO2e

18962.09

(7.21.2) Scope 2, market-based (if applicable), metric tons CO2e

0

(7.21.3) Comment

There is only one facility that produces steel within the group so only emissions related to that facility (Acería de Álava, ACVA) are included in this section.
[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)

49327.02

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

42765.06

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

14571

(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

Not applicable
[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)

29340.95

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

18962.09

(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.

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)

1529.49

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

1156.66

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1103.93

(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.

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)

3.1

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

54.55

(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.

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)

48.4

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

809.13

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

788.55

(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.

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)

42.65

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

357.61

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

844.93

(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.

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)

81.69

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

307.72

(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.

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)

356.5

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1054.5

(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.

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)

366.02

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

9.66

(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.

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)

1669.89

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

2912.79

(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.

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)

3494.03

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

2251.11

(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.

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)

9.33

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

3.31

(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.

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)

66.97

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1.2

(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.

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)

7.94

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

18.06

(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.

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)

505.18

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

7.98

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

504.07

(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.

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)

208.3

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

694.18

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

1578.7

(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.

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.

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)

51.1

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

13.34

(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.

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)

5.13

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

0.7

(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.

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)

1.52

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

2.78

(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.

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)

238.44

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

34.5

(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.

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)

65.92

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

178.61

(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.

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)

0

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

5.74

(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.

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)

3639.04

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

2042.32

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

8235.98

(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.

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)

8589.53

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

10755.13

(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.

Row 25

(7.23.1.1) Subsidiary name

NTS AMEGA ATLANTIC

(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)

106.31

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

15.12

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

12.48

(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.

Row 26

(7.23.1.1) Subsidiary name

TUBACEX SERVICE SOLUTIONS MIDDLE EAST, FZCO

(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)

1.96

(7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

2.06

(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.

Row 27

(7.23.1.1) Subsidiary name

SCHOELLER BLECKMANN TECHNISCHES SERVICE GmbH & Co.KG

(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)

87.33

(7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

1426.87

(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.
[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:
☑ Schlumberger Limited

(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

150000

(7.26.9) Emissions in metric tonnes of CO2e

9865.4

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

Fossil fuel combustion, 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

The source for calculation is the revenue of Tubacex for the specific customer in the reporting year. Using the revenue as a proxy, to estimate the gross value added (GVA) of the products/services provided to the customer, we multiply this value with our calculated emission intensity in terms of ton of CO2 equivalent per thousand euros of GVA. The method applies the average intensity of the group, not any specific business unit. By 2025, TUBACEX plans to get a refined method in place, based on actual emissions of the customer and the business unit providing the service taking advantage of the emissions tool developed by TUBACEX and that allows to know the carbon footprint at product level (cradle to gate).

(7.26.14) Where published information has been used, please provide a reference

Not applicable.

Row 2

(7.26.1) Requesting member

Select from:

☑ Schlumberger Limited

(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 the market value 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

150000

(7.26.9) Emissions in metric tonnes of CO2e

2914.2

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

Electrical power consumption

(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

The source for calculation is the revenue of Tubacex for the specific customer in the reporting year. Using the revenue as a proxy, to estimate the gross value added (GVA) of the products/services provided to the customer, we multiply this value with our calculated emission intensity in terms of ton of CO2 equivalent per thousand euros of GVA. The method applies the average intensity of the group, not any specific business unit. For 2026 we plan to have a refined method, based on actual GVA of the customer and the business unit providing the service. By 2024, TUBACEX plans to get a refined method in place, based on actual emissions of the customer and the business unit providing the service taking advantage of the emissions tool developed by TUBACEX and that allows to know the carbon footprint at product level (cradle to gate).

(7.26.14) Where published information has been used, please provide a reference

Not applicable

Row 3

(7.26.1) Requesting member

Select from:

☑ Schlumberger Limited

(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 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 the market value 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

150000

(7.26.9) Emissions in metric tonnes of CO2e

621.64

(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 market value of product purchased

(7.26.14) Where published information has been used, please provide a reference

Not applicable.

Row 4

(7.26.1) Requesting member

Select from:
☑ Petróleo Brasileiro SA - Petrobras

(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 the market value 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

24502598

(7.26.9) Emissions in metric tonnes of CO2e

1573.53

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

Fossil fuel combustion, 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

The source for calculation is the revenue of Tubacex for the specific customer in the reporting year. Using the revenue as a proxy, to estimate the gross value added (GVA) of the products/services provided to the customer, we multiply this value with our calculated emission intensity in terms of ton of CO2 equivalent per thousand euros of GVA. The method applies the average intensity of the group, not any specific business unit. For 2026 we plan to have a refined method, based on actual GVA of the customer and the business unit providing the service. By 2024, TUBACEX plans to get a refined method in place, based on actual emissions of the customer and the business unit providing the service taking advantage of the emissions tool developed by TUBACEX and that allows to know the carbon footprint at product level (cradle to gate).

(7.26.14) Where published information has been used, please provide a reference

Not applicable.

Row 5

(7.26.1) Requesting member

Select from:

☑ Petróleo Brasileiro SA - Petrobras

(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 the market value 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

24502598

(7.26.9) Emissions in metric tonnes of CO2e

464.81

(7.26.10) Uncertainty (±%)

5

(7.26.11) Major sources of emissions

Electrical power consumption

(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

The source for calculation is the revenue of Tubacex for the specific customer in the reporting year. Using the revenue as a proxy, to estimate the gross value added (GVA) of the products/services provided to the customer, we multiply this value with our calculated emission intensity in terms of ton of CO2 equivalent per thousand euros of GVA. The method applies the average intensity of the group, not any specific business unit. For 2026 we plan to have a refined method, based on actual GVA of the customer and the business unit providing the service. By 2024, TUBACEX plans to get a refined method in place, based on actual emissions of the customer and the business unit providing the service taking advantage of the emissions tool developed by TUBACEX and that allows to know the carbon footprint at product level (cradle to gate).

(7.26.14) Where published information has been used, please provide a reference

Not applicable.

Row 6

(7.26.1) Requesting member

Select from:

☑ Petróleo Brasileiro SA - Petrobras

(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 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 the market value 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

24502598

(7.26.9) Emissions in metric tonnes of CO2e

9915.18

(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

The source for calculation is the revenue of Tubacex for the specific customer in the reporting year. Using the revenue as a proxy, to estimate the gross value added (GVA) of the products/services provided to the customer, we multiply this value with our calculated emission intensity in terms of ton of CO2 equivalent per thousand euros of GVA. The method applies the average intensity of the group, not any specific business unit. For 2026 we plan to have a refined method, based on actual GVA of the customer and the business unit providing the service. By 2024, TUBACEX plans to get a refined method in place, based on actual emissions of the customer and the business unit providing the service taking advantage of the emissions tool developed by TUBACEX and that allows to know the carbon footprint at product level (cradle to gate).

(7.26.14) Where published information has been used, please provide a reference

Not applicable.
[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 15% but less than or equal to 20%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year

	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

243167

(7.30.1.4) Total (renewable + non-renewable) MWh

243167.00

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

128996

(7.30.1.3) MWh from non-renewable sources

31702

(7.30.1.4) Total (renewable + non-renewable) MWh

160698.00

Total energy consumption

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

128996

(7.30.1.3) MWh from non-renewable sources

274869

(7.30.1.4) Total (renewable + non-renewable) MWh

403865.00
[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)

132976.28

(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

132976.28

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

58992.55

(7.30.5.3) MWh consumed from non-renewable sources inside steel sector boundary (excluding recovered waste heat/gases)

0

(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

58992.55

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

58992.55

(7.30.5.3) MWh consumed from non-renewable sources inside steel sector boundary (excluding recovered waste heat/gases)

132976.28

(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

191968.83
[Fixed row]

(7.30.6) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application

	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

1474

(7.30.7.8) Comment

This amount in Mwh refers to the consumption of liquid fuel, that is, Diesel

Gas

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

240606

(7.30.7.8) Comment

This amount in Mwh refers to the consumption of Natural Gas

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

1087

(7.30.7.8) Comment

This amount in Mwh refers to the consumption of Propane

Total fuel

(7.30.7.1) Heating value

Select from:
☑ LHV

(7.30.7.2) Total fuel MWh consumed by the organization

243167

(7.30.7.8) Comment

The total amount refers to a combination of Natural Gas, Fuel and propane
[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:

☑ 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:

☑ Wind

(7.30.14.5) Low-carbon energy consumed via selected sourcing method in the reporting year (MWh)

102656

(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

Not applicable

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)

4113

(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

Not applicable

Row 4

(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)

24655

(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

Not applicable

Row 5

(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)

1031

(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

Not applicable

Row 6

(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)

654

(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

Not applicable
[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)

24775.11

(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)

24775.11

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)

734.8

(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)

734.80

France

(7.30.16.1) Consumption of purchased electricity (MWh)

30

(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)

30.00

Guyana

(7.30.16.1) Consumption of purchased electricity (MWh)

31.44

(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)

31.44

India

(7.30.16.1) Consumption of purchased electricity (MWh)

11945.77

(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)

11945.77

Italy

(7.30.16.1) Consumption of purchased electricity (MWh)

3413

(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)

3413.00

Kazakhstan

(7.30.16.1) Consumption of purchased electricity (MWh)

0

(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)

0.00

Norway

(7.30.16.1) Consumption of purchased electricity (MWh)

1031.29

(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)

1031.29

Saudi Arabia

(7.30.16.1) Consumption of purchased electricity (MWh)

2084.5

(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)

2084.50

Singapore

(7.30.16.1) Consumption of purchased electricity (MWh)

133.7

(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)

133.70

Spain

(7.30.16.1) Consumption of purchased electricity (MWh)

103079.39

(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)

103079.39

Thailand

(7.30.16.1) Consumption of purchased electricity (MWh)

1048

(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)

1048.00

United Arab Emirates

(7.30.16.1) Consumption of purchased electricity (MWh)

2096.04

(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)

2096.04

United States of America

(7.30.16.1) Consumption of purchased electricity (MWh)

10287.39

(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)

10287.39
[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:
☑ Natural gas

(7.32.2) Total consumption

12604422.65

(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

0.01

(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

None
[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)

48805

(7.41.2) Blast furnace iron consumption (metric tons)

0

(7.41.3) Direct reduced iron consumption (metric tons)

0

(7.41.4) Crude steel production (metric tons)

61601

(7.41.5) Crude steel capacity (metric tons)

80000

Other

(7.41.1) Metal scrap consumption (metric tons)

0

(7.41.2) Blast furnace iron 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)

48805

(7.41.2) Blast furnace iron consumption (metric tons)

0

(7.41.3) Direct reduced iron consumption (metric tons)

0

(7.41.4) Crude steel production (metric tons)

61601

(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)

61601

(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

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

63898.02

(7.45.3) Metric denominator

Select from:
☑ unit total revenue

(7.45.4) Metric denominator: Unit total

767540800

(7.45.5) Scope 2 figure used

Select from:
☑ Market-based

(7.45.6) % change from previous year

0.12

(7.45.7) Direction of change

Select from:
☑ Increased

(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

0.47

(7.49.3) Energy intensity figure, GJ (LHV) per metric ton of crude steel production

4.01

(7.49.4) Methodology applied

Select from:

☑ GHG Protocol

(7.49.5) Comment

Applies to Acería Alava. Energy includes 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

72072.4

(7.52.3) Metric numerator

Metric tons

(7.52.5) % change from previous year

0.29

(7.52.6) Direction of change

Select from:

☑ Increased

(7.52.7) Please explain

Since the total tons of waste produced increase by only 0.29%, the amount of recycled and recovered waste increased slightly from 82.2% in 2023 to 81.96% in 2024. This constant demonstrates Tubacex's commitment to recycling 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-SBTi.pdf

(7.53.1.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.1.5) Date target was set

12/30/2022

(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)

72780.76

(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)

140120.840

(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)

49995.116

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

49327

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

14571

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

63898.000

(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

84.57

(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. Previourly target approved by Sbti is included below: reduction of 59% (intensity/tons produced)

(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

[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

12/30/2019

(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:

☑ Other, please specify :Metric tons CO2e per EUR (€) value-added

(7.53.2.12) End date of base year

12/30/2019

(7.53.2.13) Intensity figure in base year for Scope 1

0.59

(7.53.2.14) Intensity figure in base year for Scope 2

0.64

(7.53.2.33) Intensity figure in base year for all selected Scopes

1.2300000000

(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 (%)

59

(7.53.2.57) Intensity figure at end date of target for all selected Scopes

0.5043000000

(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

0.62

(7.53.2.61) Intensity figure in reporting year for Scope 2

0.18

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

0.8000000000

(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

59.25

(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

The reason for the replacement is that the cross-sector methodology - currently underway (reduction of 64% in absolute terms) is more oriented toward the business model, which goes beyond the tons produced and focuses on delivering value.

(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 64.32% by 2030.

(7.53.2.86) Target objective

The strategic objective is to achieve a 59% reduction in carbon intensity (in tons produced) 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.

(7.53.2.88) 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-SBTi.pdf

(7.53.2.4) Target ambition

Select from:

☑ 1.5°C aligned

(7.53.2.5) Date target was set

12/30/2022

(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 1: Purchased goods and services

☑ Category 10: Processing of sold products

☑ Category 5: Waste generated in operations

☑ Category 4: Upstream 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:

☑ 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

0.97

(7.53.2.16) Intensity figure in base year for Scope 3, Category 2: Capital goods

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)

0.12

(7.53.2.18) Intensity figure in base year for Scope 3, Category 4: Upstream transportation and distribution

0.004

(7.53.2.19) Intensity figure in base year for Scope 3, Category 5: Waste generated in operations

0.0003

(7.53.2.20) Intensity figure in base year for Scope 3, Category 6: Business travel

0.01

(7.53.2.24) Intensity figure in base year for Scope 3, Category 10: Processing of sold products

0.01

(7.53.2.32) Intensity figure in base year for total Scope 3

1.2743000000

(7.53.2.33) Intensity figure in base year for all selected Scopes

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

(7.53.2.45) % 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

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

0.9158

(7.53.2.63) Intensity figure in reporting year for Scope 3, Category 2: Capital goods

0.0942

(7.53.2.64) Intensity figure in reporting year for Scope 3, Category 3: Fuel- and energy-related activities

0.1023

(7.53.2.65) Intensity figure in reporting year for Scope 3, Category 4: Upstream transportation and distribution

0.0267

(7.53.2.66) Intensity figure in reporting year for Scope 3, Category 5: Waste generated in operations

0.0003

(7.53.2.67) Intensity figure in reporting year for Scope 3, Category 6: Business travel

0.0018

(7.53.2.71) Intensity figure in reporting year for Scope 3, Category 10: Processing of sold products

0.0114

(7.53.2.79) Intensity figure in reporting year for total Scope 3

1.1525000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

1.1525000000

(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

17.25

(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:

☑ 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

12/30/2019

(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 9: Downstream transportation and distribution

☑ Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

☑ Category 1: Purchased goods and services
☑ Category 5: Waste generated in operations
☑ Category 4: Upstream transportation and distribution

(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

2.36

(7.53.2.16) Intensity figure in base year for Scope 3, Category 2: Capital goods

0.4

(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)

0.3

(7.53.2.18) Intensity figure in base year for Scope 3, Category 4: Upstream transportation and distribution

0.01

(7.53.2.19) Intensity figure in base year for Scope 3, Category 5: Waste generated in operations

0.0008

(7.53.2.20) Intensity figure in base year for Scope 3, Category 6: Business travel

0.027

(7.53.2.23) Intensity figure in base year for Scope 3, Category 9: Downstream transportation and distribution

0.088

(7.53.2.32) Intensity figure in base year for total Scope 3

3.1858000000

(7.53.2.33) Intensity figure in base year for all selected Scopes

3.1858000000

(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

2.2300600000

(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

3.1

(7.53.2.63) Intensity figure in reporting year for Scope 3, Category 2: Capital goods

0.32

(7.53.2.64) Intensity figure in reporting year for Scope 3, Category 3: Fuel- and energy-related activities

0.35

(7.53.2.65) Intensity figure in reporting year for Scope 3, Category 4: Upstream transportation and distribution

0.09

(7.53.2.66) Intensity figure in reporting year for Scope 3, Category 5: Waste generated in operations

0.0011

(7.53.2.67) Intensity figure in reporting year for Scope 3, Category 6: Business travel

0.006

(7.53.2.70) Intensity figure in reporting year for Scope 3, Category 9: Downstream transportation and distribution

0

(7.53.2.79) Intensity figure in reporting year for total Scope 3

3.8671000000

(7.53.2.80) Intensity figure in reporting year for all selected Scopes

3.8671000000

(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

-71.29

(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

The reason for the replacement is that the cross-sector methodology is more oriented toward the business model, which goes beyond the tons produced and focuses on delivering value.

(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 30% reduction in emissions intensity relative to tons produced 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)

(7.53.2.86) Target objective

The strategic objective is to achieve a 30% reduction in Scope 3 emissions intensity relative to tons produced by 2030. This ambitious target is crucial for enhancing our sustainability practices and minimizing our carbon footprint across the value chain.

(7.53.2.88) Target derived using a sectoral decarbonization approach

Select from:
☑ Yes
[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

32

(7.54.1.13) % of target achieved relative to base year

80.00

(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

82.29

(7.54.2.12) % of target achieved relative to base year

63.6857142857

(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 S1+S2 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.

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 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 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
Under investigation	*6*	*`Numeric input*
To be implemented	*10*	*8620.83*
Implementation commenced	*1*	*1492*
Implemented	*3*	*167.6*
Not to be implemented	*1*	*`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
☑ Machine/equipment replacement

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

148.5

(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 1.2)

8569

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

85690

(7.55.2.7) Payback period

Select from:
☑ 1-3 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:
☑ 6-10 years

(7.55.2.9) Comment

Replacement furnace recuperator

Row 8

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in production processes
☑ Other, please specify :Compressed air

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

19.1

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

16943

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

254156

(7.55.2.7) Payback period

Select from:

☑ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ 11-15 years

(7.55.2.9) Comment

More energy-efficient air compressors model.

Row 9

(7.55.2.1) Initiative category & Initiative type

Transportation

☑ Other, please specify :Company fleet vehicle replacement

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

5.56

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

882

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

8220

(7.55.2.7) Payback period

Select from:

☑ No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:
☑ 6-10 years

(7.55.2.9) Comment

Electric car charger
[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 SBTi.

Row 2

(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 3

(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 4

(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 5

(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

(7.65.3) Comment

Not applicable

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

(7.65.3) Comment

Not applicable

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

(7.65.3) Comment

Not applicable

Electric arc furnace: Integrated, real-time process control and monitoring systems

(7.65.1) % of total plant capacity

100

(7.65.2) Primary reason for not having technique

Select from:

☑ Other, please specify :We use the selected technology

(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

(7.65.3) Comment

Not applicable

Casting: Near net shape casting, e.g. thin slab, thin strip, etc.

(7.65.1) % of total plant capacity

15

(7.65.2) Primary reason for not having technique

Select from:

☑ Other, please specify :We use the selected technology

(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

(7.65.2) Primary reason for not having technique

Select from:
☑ Other, please specify :We use the selected technology

(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

(7.65.3) Comment

Not applicable

Hot rolling mill: Walking beam furnace

(7.65.1) % of total plant capacity

10

(7.65.2) Primary reason for not having technique

Select from:
☑ Other, please specify :We use the selected technology

(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

(7.65.2) Primary reason for not having technique

Select from:
☑ Other, please specify :We use the selected technology

(7.65.3) Comment

The percentage of total plant capacity refers to the steel mill plant

Other

(7.65.1) % of total plant capacity

0

(7.65.2) Primary reason for not having technique

Select from:

☑ Other, please specify :Not applicable

(7.65.3) Comment

Not applicable
[Fixed row]

(7.73) Are you providing product level data for your organization’s goods or services?

Select from:

☑ No, I am not providing data

(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 retired 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:
☑ Yes

(9.1.1) Provide details on these exclusions.

Row 1

(9.1.1.1) Exclusion

Select from:
☑ Water aspects

(9.1.1.2) Description of exclusion

Water discharges corresponding to some TUBACEX´s plants.

(9.1.1.3) Reason for exclusion

Select from:
☑ Data is not available

(9.1.1.4) Primary reason why data is not available

Select from:
☑ We are planning to collect the data within the next two years

(9.1.1.7) Percentage of water volume the exclusion represents

Select from:

☑ 61-70%

(9.1.1.8) Please explain

Certain sites have been excluded from discharge data reporting because they were not considered significant for the water risk, opportunities, and impacts analysis. Out of 43 sites analyzed, 23 were identified as plants with significant water consumption in the group and among them, discharge data is available for 13 sites. The excluded sites primarily include commercial offices and warehouses, which have very low water consumption, while the sites with significant water consumption account for approximately 94.7% of total water consumption. Discharges represent 15.2% and 4.2% for wastewater treatment, reflecting the percentage of sites for which discharge data is not yet available. Discharges from that sites are therefore excluded from this reporting. The calculations provided are based on measured data and estimates with a high confidence level (97%).
[Add row]

(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

Direct monitoring, using consumes from plants (invoices or meters).

(9.2.4) Please explain

TUBACEX measures water intake from municipal, surface, and groundwater sources using direct meter readings and invoices, with the exception of four months of estimated data at Álava due to meter errors. Groundwater is not extracted. Discharge data will be included starting in 2025. The company applies ISO 14001-based policies to identify and assess water pollutants, focusing on substances like heavy metals and chemical residues. A comprehensive analysis of materials used in

production is conducted, considering environmental risks. Wastewater is monitored continuously to ensure compliance. Environmental Authorizations specify which pollutants must be analyzed, sampling frequency, and whether discharge is into rivers or sewer systems. Accredited external bodies collect and analyze samples. Key metrics include pH, BOD, COD, and heavy metals. All measurements are direct, with no estimations, ensuring regulatory compliance and early risk mitigation.

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

Direct monitoring, using consumes from plants (invoices or meters).

(9.2.4) Please explain

TUBACEX measures water intake from municipal, surface, and groundwater sources using direct meter readings and invoices, with the exception of four months of estimated data at Álava due to meter errors. Groundwater is not extracted. Discharge data will be included starting in 2025. The company applies ISO 14001-based policies to identify and assess water pollutants, focusing on substances like heavy metals and chemical residues. A comprehensive analysis of materials used in production is conducted, considering environmental risks. Wastewater is monitored continuously to ensure compliance. Environmental Authorizations specify which pollutants must be analyzed, sampling frequency, and whether discharge is into rivers or sewer systems. Accredited external bodies collect and analyze samples. Key metrics include pH, BOD, COD, and heavy metals. All measurements are direct, with no estimations, ensuring regulatory compliance and early risk mitigation.

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:

☑ Not relevant

(9.2.4) Please explain

TUBACEX has certified environmental management systems and is working to strengthen governance and the systematization of data collection for reporting purposes, in order to comply with new sustainability reporting regulations following the TCFD and TNFD LEAP methodology. The commitment to water quality is demonstrated through wastewater monitoring and discharge control. In plants located in water-stressed areas, actions are not focused on minimizing consumption or water efficiency, but rather on ensuring water quality. For this purpose, water samples are monitored, and wastewater discharges are periodically controlled.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Yearly

(9.2.3) Method of measurement

Calculations are based on measured data and estimates with a high confidence level (97%).

(9.2.4) Please explain

Only a small proportion of discharges comes from certain sites within the group, primarily warehouses and commercial offices and for these sites the exact discharge volumes are not fully known. Data collection is prioritized at sites with higher water consumption and higher discharge volumes, which are more significant for the group's water risk and impact analysis. A proportion of 15.2% and 4.2% corresponds to sites for which discharge information is not yet available. Sites with higher consumption and significant discharges are prioritized, and it is expected that all sites with relevant water consumption will be progressively incorporated by 2025. It is expected that by 2025, discharge information from all sites will be progressively incorporated.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Yearly

(9.2.3) Method of measurement

Calculations are based on measured data and estimates with a high confidence level (97%).

(9.2.4) Please explain

Only a small proportion of discharges comes from certain sites within the group, primarily warehouses and commercial offices and for these sites the exact discharge volumes are not fully known. Data collection is prioritized at sites with higher water consumption and higher discharge volumes, which are more significant for the group's water risk and impact analysis. A proportion of 15.2% and 4.2% corresponds to sites for which discharge information is not yet available. Sites with higher consumption and significant discharges are prioritized, and it is expected that all sites with relevant water consumption will be progressively incorporated by 2025. It is expected that by 2025, discharge information from all sites will be progressively incorporated.

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:

☑ Yearly

(9.2.3) Method of measurement

Calculations are based on measured data and estimates with a high confidence level (97%).

(9.2.4) Please explain

Only a small proportion of discharges comes from certain sites within the group, primarily warehouses and commercial offices and for these sites the exact discharge volumes are not fully known. Data collection is prioritized at sites with higher water consumption and higher discharge volumes, which are more significant for the group's water risk and impact analysis. A proportion of 15.2% and 4.2% corresponds to sites for which discharge information is not yet available. Sites with higher consumption and significant discharges are prioritized, and it is expected that all sites with relevant water consumption will be progressively incorporated by 2025. It is expected that by 2025, discharge information from all sites will be progressively incorporated.

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Yearly

(9.2.3) Method of measurement

Direct measurements are carried out for the following pollutants: ammonia, total nitrogen, total phosphorus, chromium and nickel and compounds, halogenated organic compounds, total organic carbon (COD), and trichloroethylene, for the plants with Integrated Environmental Authorisations, such as TTI Amurrio, TTI Llodio and ACERALAVA.

(9.2.4) Please explain

The previously mentioned pollutants have been identified through direct measurements. In the case of plants of relative importance for which data was not available, estimates have been made based on measurements from the previous year. This is because, according to current legislation, there is no obligation to measure certain parameters, or the results of the annual measurements are not yet available. As a result, it was decided to estimate the values not obtained directly.

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:

☑ Yearly

(9.2.3) Method of measurement

Direct measurements are carried out for the following pollutants: ammonia, nitrogen oxides, total nitrogen, total phosphorus, chromium and compounds, nickel and compounds, halogenated organic compounds, total organic carbon, trichloroethylene, and fluorides, for the plants with Integrated Environmental Authorisations, such as TTI Amurrio, TTI Llodio and ACERALAVA.

(9.2.4) Please explain

The previously mentioned pollutants have been identified through direct measurements. In the case of plants of relative importance for which data was not available, estimates have been made based on measurements from the previous year. This is because, according to current legislation, there is no obligation to measure certain parameters, or the results of the annual measurements are not yet available. As a result, it was decided to estimate the values not obtained directly.

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:

☑ 26-50

(9.2.2) Frequency of measurement

Select from:

☑ Monthly

(9.2.3) Method of measurement

Temperature of discharged water is measured periodically at different points in the plants, in line with Environmental Authorizations

(9.2.4) Please explain

This information is not consolidated at Group level. TUBACEX has implemented ISO 14001 standard in its main production plants. Non-certified plants follow a voluntary system based on this standard to control the processes and minimize the environmental impacts of the activity. This ensures the monitoring and periodic maintenance of equipment and the monitoring of environmental parameters, ensuring compliance with authorized limits and minimizing risks associated with pollution and emissions.

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

Direct monitoring, by consumes from plants (invoices or meters).

(9.2.4) Please explain

TUBACEX ensures the provision of fully-functioning, safely managed WASH services to all workers across its plants. Monitoring is carried out through internal audits, occupational health & safety inspections, and compliance certificates of facilities.

Water recycled/reused

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Yearly

(9.2.3) Method of measurement

Direct monitoring, using operational data from meters and internal control systems

(9.2.4) Please explain

TUBACEX consolidates at Group level the volume of water reused and recycled in its plants, using actual operational data obtained from meters and internal monitoring systems, without resorting to modeled estimates. The indicator refers exclusively to internally recirculated water within production processes, including measures such as closed-loop cooling systems, reuse of cooling water, and recovery of water from degreasing rinse tanks.

The provision of fully-functioning, safely managed WASH services to all workers

(9.2.1) % of sites/facilities/operations

Select from:

☑ 76-99

(9.2.2) Frequency of measurement

Select from:

☑ Continuously

(9.2.3) Method of measurement

Direct monitoring, based on internal audits, occupational health & safety inspections, and compliance certificates of facilities across all plants.

(9.2.4) Please explain

Although there is not yet a formal measurement system in place for WASH service provision across all facilities, Tubacex ensures that all workers have access to fully functioning and safely managed water, sanitation and hygiene (WASH) services. As part of its commitment to the UN Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) conventions, Tubacex guarantees safe and healthy working conditions including access to clean drinking

water, sanitary facilities, and hygiene provisions at all operational sites. This commitment is embedded in the company's internal health and safety policies, implemented globally. All Tubacex facilities are designed and maintained in accordance with local and international health and safety regulations, including WASH-related requirements. While the importance of establishing monitoring indicators is recognized, Tubacex currently relies on operational compliance, internal protocols and adherence to legal framework
[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)

1731.62

(9.2.2.2) Comparison with previous reporting year

Select from:
☑ Higher

(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

Water consumption has shown an increase compared to 2023, which is due to improved accuracy in the reported data, as in 2024 a plant from the SBER group, in Austria, has been included in the report for the first time. However, upon detailed analysis, a decrease in water consumption, both from the municipal network and surface water, can be observed compared to 2023.

Total discharges

(9.2.2.1) Volume (megaliters/year)

1465.41

(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:

☑ Higher

(9.2.2.5) Primary reason for forecast

Select from:

☑ Increase/decrease in efficiency

(9.2.2.6) Please explain

Discharge volumes are reported for the first time in 2024. No direct comparison with the previous year is available. The reported data have been calculated with high accuracy, based on measured values and estimates with a high confidence level (97%).

Total consumption

(9.2.2.1) Volume (megaliters/year)

266.21

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Lower

(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:

☑ Change in accounting methodology

(9.2.2.6) Please explain

Total water consumption shows a decrease compared to 2023. This change is primarily due to the inclusion of discharge volumes in the 2024 calculations, which provides a more complete and accurate picture of water use. The reported data are based on measured values and estimates with a high confidence level (97%). [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)

9.46

(9.2.4.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(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

0.55

(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

To identify Tubacex's material sites, physical locations and specific sites with significant sustainability impacts were analyzed. A total of 43 sites were assessed, including the steel plant, production facilities, distribution centers, warehouses and corporate offices. Of these, 23 sites were considered material for the analysis of water-related risks and opportunities. The methodology follows the TNFD recommendations and the LEAP framework (Locate, Evaluate, Assess, Prepare). In the first phase, "LOCATE," the materiality of Tubacex activities was defined in relation to its sector using the GICS (Global Industry Classification Standard) via the Encore tool. The ecological context of each location was then analyzed by identifying study sites and using bibliographic resources and appropriate tools to determine their environmental status through selected indicators. Tubacex made use of key tools such as the WWF Water Risk Filter, Aqueduct and ICCA for the identification of sensitive areas. Sensitive areas were determined following TNFD criteria, including areas of high physical water stress, which directly influence the company's water risk management and planning. Dubai is the location with the highest water stress within Tubacex's operations (4 WWF) located in drought-prone areas, followed by Thailand (3.6 WWF) and Saudi Arabia (4 WWF).
[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)

67.98

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

The volume of fresh surface water, related to rivers, is calculated entirely using actual data from a meter and/or invoices. As part of its current ESG Plan, TUBACEX has defined a specific target for reducing water consumption by optimizing its intensity relative to financial value (Gross Value Added) in both industrial processes and irrigation use. The current trend in consumption reduction is positive.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

TUBACEX does not use seawater in its productions processes.

Groundwater – renewable

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

1389.62

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.7.5) Please explain

Water consumption has shown an increase compared to 2023, which is due to greater accuracy in the reported data, as in 2024 a plant from the SBER group has been included in the report. However, upon detailed analysis, a decrease in water consumption, both from the municipal network and surface water, can be observed compared to 2023. The quality of water from aquifers is taken into account, especially in the case of Austria, where there is a high dependence on water resources for industrial processes; a closed-loop system is used with water extracted from an aquifer. In India, there is also a high dependence on water consumption from an aquifer with a low risk of drought at the location.

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

101.36

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.7.5) Please explain

Water consumption has shown an increase compared to 2023, which is due to greater accuracy in the reported data, as in 2024 a plant from the SBER group has been included in the report. However, upon detailed analysis, a decrease in water consumption, both from the municipal network and surface water, can be observed compared to 2023. The quality of water from aquifers is taken into account, especially in the case of Austria, where there is a high dependence on water resources for industrial processes; a closed-loop system is used with water extracted from an aquifer. In India, there is also a high dependence on water consumption from an aquifer with a low risk of drought at the location.

Produced/Entrained water

(9.2.7.1) Relevance

Select from:

☑ Not relevant

(9.2.7.5) Please explain

TUBACEX does not use produced water in its productions processes

Third party sources

(9.2.7.1) Relevance

Select from:

☑ Relevant

(9.2.7.2) Volume (megaliters/year)

172.65

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in efficiency

(9.2.7.5) Please explain

Water consumption has shown an increase compared to 2023, which is due to greater accuracy in the reported data, as a plant from the SBER group was included in the 2024 report. However, a detailed analysis shows a decrease in water consumption, both from the municipal network and surface water sources, compared to 2023. Therefore, a positive future trend is expected regarding municipal water consumption.
[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

1403.82

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ This is our first year of measurement

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.8.5) Please explain

This information is not consolidated at Group level. TUBACEX has implemented ISO 14001 standard in its main production plants. Non-certified plants follow a voluntary system based on this standard to control the processes and minimize the environmental impacts of the activity. This ensures the monitoring and periodic maintenance of equipment and the monitoring of environmental parameters, ensuring compliance with authorized limits and minimizing risks associated with pollution and emissions. In plants affected by Integrated Environmental Authorizations (AAI) specify the pollutants that must be measured in each discharge flow, whether into the river (as in the case of TTI Amurrio and Aceralava) or into a collector (as in TTI Llodio), as well as the frequency with which samples must be taken for analysis.

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

0

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ This is our first year of measurement

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.8.5) Please explain

TUBACEX's industrial operations are located in areas where freshwater sources—such as municipal supply, authorized surface water, or groundwater—are sufficient and available for meeting operational needs. None of our production facilities are located in coastal or estuarine environments where such sources would be relevant or necessary. All our water needs are met through freshwater sources such as municipal supply networks and authorized groundwater or surface water catchments, depending on the location. These sources are selected based on availability, quality, regulatory compliance, and operational efficiency.

Groundwater

(9.2.8.1) Relevance

Select from:

☑ Relevant

(9.2.8.2) Volume (megaliters/year)

9.63

(9.2.8.3) Comparison with previous reporting year

Select from:

☑ This is our first year of measurement

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.8.5) Please explain

This information is not consolidated at Group level. TUBACEX has implemented ISO 14001 standard in its main production plants. Non-certified plants follow a voluntary system based on this standard to control the processes and minimize the environmental impacts of the activity. This ensures the monitoring and periodic maintenance of equipment and the monitoring of environmental parameters, ensuring compliance with authorized limits and minimizing risks associated with pollution and emissions.

Third-party destinations

(9.2.8.1) Relevance

Select from:
☑ Relevant

(9.2.8.2) Volume (megaliters/year)

51.97

(9.2.8.3) Comparison with previous reporting year

Select from:
☑ This is our first year of measurement

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:
☑ Change in accounting methodology

(9.2.8.5) Please explain

Wastewater from several of our manufacturing facilities (including IBF, TTA, TBX Services, TSS Norway, Durant, NTS, a portion of ACVA and TTP) is conveyed to external wastewater treatment providers, typically through municipal sewer systems. These third parties are responsible for the final treatment and discharge of the water into the environment in compliance with applicable regulations. At present, TUBACEX does not directly discharge to surface water bodies or groundwater in these cases. The responsibility for environmental discharge lies with the third-party operator. Monitoring is conducted at the point of transfer to ensure quality and compliance with discharge permits. Although the company does not track the final environmental destination once the water leaves our system, we report volumes discharged to third parties and maintain documentation of treatment agreements and discharge licenses.
[Fixed row]

(9.2.9) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

Tertiary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:
☑ Relevant

(9.2.9.2) Volume (megaliters/year)

48.45

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ This is our first year of measurement

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 71-80

(9.2.9.6) Please explain

Around 71–80% of discharges generated by industrial operations have been treated prior to release. This treatment is considered relevant due to the type of potential contaminants present, such as heavy metals and chemical residues. In 2024, continuous monitoring of the wastewater composition was also carried out to ensure compliance with legal requirements and effectively manage risks to aquatic ecosystems and human health. This is the first year that the total volume of treated megaliters is being reported, as a result of improved data accuracy and the inclusion of an additional SBER Group plant in Austria in the disclosure. The volume of treated discharges is expected to remain stable or even decrease in the coming years, as a result of ongoing water efficiency measures aimed at optimizing water use in industrial processes and promoting internal recirculation.

Secondary treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

1002.32

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ This is our first year of measurement

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 71-80

(9.2.9.6) Please explain

Around 71–80% of discharges generated by industrial operations have been treated prior to release. This treatment is considered relevant due to the type of potential contaminants present, such as heavy metals and chemical residues. In 2024, continuous monitoring of the wastewater composition was also carried out to ensure compliance with legal requirements and effectively manage risks to aquatic ecosystems and human health. This is the first year that the total volume of treated megaliters is being reported, as a result of improved data accuracy and the inclusion of an additional SBER Group plant in Austria in the disclosure. The volume of treated discharges is expected to remain stable or even decrease in the coming years, as a result of ongoing water efficiency measures aimed at optimizing water use in industrial processes and promoting internal recirculation.

Primary treatment only

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Not relevant

(9.2.9.6) Please explain

Not relevant: In our plants, only primary treatment is not carried out. Water volumes undergo additional treatment before discharge, either at our facilities or after treatment by a third party.

Discharge to the natural environment without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

353.05

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ This is our first year of measurement

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 21-30

(9.2.9.6) Please explain

Approximately 21–30% of discharges generated by industrial operations are released directly into the natural environment without prior treatment. This is primarily due to the nature of these discharges, which consist of non-hazardous process waters or stormwater runoff that meet regulatory quality standards and pose minimal

environmental risk. Continuous monitoring is conducted to ensure compliance with legal limits and to safeguard aquatic ecosystems and human health. Efforts are ongoing to further reduce these untreated discharges through improved water management and treatment technologies. This is the first year that the total volume of untreated megaliters is being reported, as a result of improved data accuracy and the inclusion of an additional SBER Group plant in Austria in the disclosure.

Discharge to a third party without treatment

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

0.09

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ This is our first year of measurement

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ Less than 1%

(9.2.9.6) Please explain

Less than 1% of discharges generated by industrial operations are sent to a third party without prior treatment. This practice is considered relevant due to the nature of the discharges and the type of potential contaminants involved, such as heavy metals and chemical residues. In 2024, continuous monitoring of the wastewater composition was carried out by the third party to ensure compliance with legal requirements and to effectively manage risks to aquatic ecosystems and human health. This is the first year that the total volume of untreated megaliters discharged to third parties is being reported, as a result of improved data accuracy and the inclusion

of an additional SBER Group plant in Austria in the disclosure. The volume of discharges sent untreated to third parties is expected to remain stable or even decrease in the coming years, due to ongoing water efficiency measures aimed at optimizing water use in industrial processes and promoting internal recirculation.

Other

(9.2.9.1) Relevance of treatment level to discharge

Select from:

☑ Relevant

(9.2.9.2) Volume (megaliters/year)

61.5

(9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☑ This is our first year of measurement

(9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☑ Change in accounting methodology

(9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☑ 21-30

(9.2.9.6) Please explain

Approximately 21–30% of discharges generated by industrial operations fall under the "Other" category, which includes all volumes for which no detailed treatment information is available. These discharges may include a mix of treated, untreated, or partially treated waters. Continuous efforts are being made to improve data collection and reporting accuracy. This is the first year that the total volume of discharges in this category is being reported, thanks to enhanced data accuracy and the inclusion of an additional SBER Group plant in Austria in the disclosure. The volume of discharges classified as "Other" is expected to remain stable or decrease in the coming years as data management improves and water efficiency measures continue to be implemented.

[Fixed row]

(9.2.10) Provide details of your organization’s emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.

(9.2.10.1) Emissions to water in the reporting year (metric tons)

55160.51

(9.2.10.2) Categories of substances included

Select all that apply

☑ Nitrates

☑ Phosphates

☑ Priority substances listed under the EU Water Framework Directive

(9.2.10.3) List the specific substances included

Trichloro-ethylene, ammonia, chromium, lead and its compounds, nickel and its compounds, halogenated organic compounds, fluorides, nitrates and phospates.

(9.2.10.4) Please explain

The reported values (in tonnes per year) correspond to emissions from the plants of TTA, TAT, SALEM, TTI Llodio, SBER and TTI Amurrio, and refer specifically to priority substances listed under the EU Water Framework Directive. In the case of nitrogen compounds, the data includes emissions from TTI Llodio, SBER and ACVA. For phosphates, emissions are reported for SBER and TTI Llodio. In all cases, the measured values are well within the legal limits established by environmental regulations. It should be noted that the total reported emissions for the group in previous years were very high, because they were based on estimates for all group plants, derived from priority substances detected in studies from a subset of plants. For plants that did not report actual emissions, values were assigned per pollutant proportionally to production levels, which led to high estimated totals. In 2025, direct measurements have been carried out for the plants listed above, resulting in a total of 8.17 tonnes of emissions to water for the group. This practice will be extended in 2025 and beyond to include additional group plants, improving the accuracy and completeness of reported emissions data. Tubacex follows ISO 14001 policies to monitor water pollutants, focusing on heavy metals and chemical residues. Wastewater is continuously sampled by accredited labs for key parameters to ensure compliance, with audits and evaluations for early risk detection.
[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

23

(9.3.3) % of facilities in direct operations that this represents

Select from:

☑ 26-50

(9.3.4) Please explain

To identify Tubacex's material sites, physical locations and specific sites with significant sustainability impacts were analyzed. A total of 43 sites were assessed, including the steel plant, production facilities, distribution centers, warehouses and corporate offices. Of these, 23 sites were considered material for the analysis of water-related risks and opportunities. The methodology follows the TNFD recommendations and the LEAP framework (Locate, Evaluate, Assess, Prepare). In the first phase, "LOCATE," the materiality of Tubacex activities was defined in relation to its sector using the GICS (Global Industry Classification Standard) via the Encore tool. The ecological context of each location was then analyzed by identifying study sites and using bibliographic resources and appropriate tools to determine their environmental status through selected indicators. Tubacex made use of key tools such as the WWF Water Risk Filter, Aqueduct and ICCA for the identification of sensitive areas. Sensitive areas were determined following TNFD criteria, including areas of high physical water stress, which directly influence the company's water risk management and planning.

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

TUBACEX does not currently measure water use in its upstream value chain. At present, we do not have detailed visibility over the water use associated with the production of raw materials or services purchased from suppliers. This includes the water embedded in the supply of alloy steels, metallic inputs, and logistics services. However, we recognize the importance of understanding water-related impacts beyond our operational boundaries. As part of our broader ESG strategy, we plan to begin assessing upstream water use starting in 2025, by: Identifying strategic suppliers with potentially significant water footprints. Engaging selected suppliers through sustainability questionnaires. Exploring secondary data sources such as life-cycle inventory databases and industry benchmarks to estimate water intensity by material or service type. Our goal is to progressively enhance our understanding and reporting of value chain water use in line with CDP and Science-Based Targets for Nature (SBTN) expectations.
[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 and discharges

(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:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

11.46

(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

0.34

(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

11.12

(9.3.1.21) Total water discharges at this facility (megaliters)

2.09

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.23) Discharges to fresh surface water

2.09

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

9.37

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

An analysis of impacts, dependencies, risks, and opportunities related to water stress at the ACERALAVA plant has been carried out, considering sales volume, production in tons, water consumption and the geographic location. According to WWF Water Risk Filter, the plant is not located in a water-stressed area (1,6 WWF). Although the facility primarily uses potable water, a specific residual process draws water from the river for a cooling system, which represents the only registered industrial discharge. This process is used to produce a martensitic material, which is uncommon, so the river intake and discharge are minimal; water is mainly used to cool ingots and is returned to the river almost entirely. This discharge is calculated by direct measurement. The plant also manages sanitary wastewater, but overall it is considered self-sufficient in water treatment. Its Integrated Environmental Authorization specifies the pollutants that must be measured in each discharge flow into the river, as well as the frequency of sampling. Subsequently, an external Accredited Control Body (OCA) collects the samples according to this schedule and analyzes the established parameters. The comparison of water consumption with the previous year shows a lower value this year, as discharges were not accounted for last year but are included in the calculation in the reporting year. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 2

(9.3.1.1) Facility reference number

Select from:

☑ Facility 2

(9.3.1.2) Facility name (optional)

IBF SpA.

(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 and discharges

(9.3.1.7) Country/Area & River basin

Italy

☑ Other, please specify :Trebbia river

(9.3.1.8) Latitude

45.493568

(9.3.1.9) Longitude

9.62647

(9.3.1.10) Located in area with water stress

Select from:
☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

52.06

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:
☑ Higher

(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

47.17

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

4.89

(9.3.1.21) Total water discharges at this facility (megaliters)

50.5

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:
☑ This is our first year of measurement

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

50.41

(9.3.1.27) Total water consumption at this facility (megaliters)

1.56

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

The quality of the aquifers and surface water bodies in the area is generally considered good. Monitoring of the Trebbia River shows that water quality remains consistently high along the entire stretch. According to the WWF Water Risk Filter, the site is not located in a water-stressed area (1,4 WWF). A significant surface water body is present, located less than 250 m from the site and hydrogeologically downstream, or alternatively located more than 250 m away but receiving discharges from the site. For the IBF plants, the nature and quantity of these discharges do not generate significant impacts on the consortium's wastewater treatment plant. All data provided are estimates. The water stress parameter is determined based on the volume of available surface and groundwater in a given area, and the overall risk level reflects the integration of indicators such as Water Depletion, Baseline Water Stress, Blue Water Scarcity and Groundwater Level trends. The comparison of water consumption with the previous year shows a lower value this year, as discharges were not accounted for last year but are included in the calculation in the reporting year. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 3

(9.3.1.1) Facility reference number

Select from:

☑ Facility 3

(9.3.1.2) Facility name (optional)

NTS- BROUSSARD

(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 reporting excludes sites with a small proportion of discharges, primarily warehouses and commercial offices, because they have a lower water consumption compared to the rest of the sites in the group. Data collection is prioritized at sites with significant water consumption and higher discharge volumes, which represent most of the water use in the group (approximately 94.7%). It is expected that, by 2025, discharge data from all sites will be progressively incorporated, improving the consolidation of discharge information

(9.3.1.7) Country/Area & River basin

United States of America

☑ Other, please specify :NA

(9.3.1.8) Latitude

30.164806

(9.3.1.9) Longitude

-91.975412

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.52

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ This is our first year of measurement

(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

0.52

(9.3.1.27) Total water consumption at this facility (megaliters)

0.52

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the NTS Broussard plant. According to the WWF Water Risk Filter, the site is located in an area with a score of 1.4 WWF, indicating a low water stress risk. 2024 is the first year in which water withdrawals have been measured, establishing a baseline for future monitoring and reporting. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 4

(9.3.1.1) Facility reference number

Select from:

☑ Facility 4

(9.3.1.2) Facility name (optional)

NTS- ROCKET CANADA, 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 reporting excludes sites with a small proportion of discharges, primarily warehouses and commercial offices, because they have a lower water consumption compared to the rest of the sites in the group. Data collection is prioritized at sites with significant water consumption and higher discharge volumes, which represent most of the water use in the group (approximately 94.7%). It is expected that, by 2025, discharge data from all sites will be progressively incorporated, improving the consolidation of discharge information

(9.3.1.7) Country/Area & River basin

United States of America

☑ Other, please specify :NA

(9.3.1.8) Latitude

53.29343

(9.3.1.9) Longitude

-113.52823

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.4

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ This is our first year of measurement

(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

0.4

(9.3.1.27) Total water consumption at this facility (megaliters)

0.4

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the NTS Rocket Canada plant. According to the WWF Water Risk Filter, the site is located in an area with a score of 1.6 WWF, indicating a low water stress risk. 2024 is the first year in which water withdrawals have been measured, establishing a baseline for future monitoring and reporting. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 5

(9.3.1.1) Facility reference number

Select from:

☑ Facility 5

(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 reporting excludes sites with a small proportion of discharges, primarily warehouses and commercial offices, because they have a lower water consumption compared to the rest of the sites in the group. Data collection is prioritized at sites with significant water consumption and higher discharge volumes, which represent most of the water use in the group (approximately 94.7%). It is expected that, by 2025, discharge data from all sites will be progressively incorporated, improving the consolidation of discharge information

(9.3.1.7) Country/Area & River basin

United Arab Emirates

☑ Other, please specify :NA

(9.3.1.8) Latitude

24.96879

(9.3.1.9) Longitude

55.074115

(9.3.1.10) Located in area with water stress

Select from:

☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

1.95

(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

1.95

(9.3.1.27) Total water consumption at this facility (megaliters)

1.95

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:
☑ About the same

(9.3.1.29) Please explain

The plant, located in UAE, presents a high water quality risk level (4.8, WWF Water Risk Filter) and is situated in a drought-prone area. However, there are no processes at this site that consume a material volume of water. It is important to note that facilities located in high water stress areas, where water extraction may pose a significant challenge, are required to develop plans to mitigate the potential impacts of this risk. The WWF Water Risk Filter provides a parameter of water availability that considers not only climatological indicators, such as the duration and frequency of drought events, but also the abundance or scarcity of freshwater resources. This parameter is derived from the volume of available surface and groundwater in a specific area. The overall risk level reflects the integration of several indicators, including Water Depletion, Baseline Water Stress, Blue Water Scarcity, and Groundwater Level trends. These factors are particularly relevant as they can significantly affect business activities, leading to potential supply chain disruptions, increased operational costs and limitations on company growth. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 6

(9.3.1.1) Facility reference number

Select from:

☑ Facility 6

(9.3.1.2) Facility name (optional)

NTS- AMEGA WEST SINGAPORE, PTE 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 reporting excludes sites with a small proportion of discharges, primarily warehouses and commercial offices, because they have a lower water consumption compared to the rest of the sites in the group. Data collection is prioritized at sites with significant water consumption and higher discharge volumes, which represent most of the water use in the group (approximately 94.7%). It is expected that, by 2025, discharge data from all sites will be progressively incorporated, improving the consolidation of discharge information

(9.3.1.7) Country/Area & River basin

Singapore

☑ Other, please specify :NA

(9.3.1.8) Latitude

1.453057

(9.3.1.9) Longitude

103.803796

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.61

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ This is our first year of measurement

(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

0.61

(9.3.1.27) Total water consumption at this facility (megaliters)

0.61

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:
☑ This is our first year of measurement

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the NTS AMEGA WEST plant. According to the WWF Water Risk Filter, the site is located in an area with a score of 2.2 WWF, indicating a low water stress risk. At present, water discharges have neither been measured nor estimated. Plans are in place to optimize the collection of these data in the coming years, in order to establish a reliable baseline for future monitoring and reporting. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 7

(9.3.1.1) Facility reference number

Select from:

☑ Facility 7

(9.3.1.2) Facility name (optional)

NTS- AMEGA ATLANTIC, 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 reporting excludes sites with a small proportion of discharges, primarily warehouses and commercial offices, because they have a lower water consumption compared to the rest of the sites in the group. Data collection is prioritized at sites with significant water consumption and higher discharge volumes, which represent most of the water use in the group (approximately 94.7%). It is expected that, by 2025, discharge data from all sites will be progressively incorporated, improving the consolidation of discharge information.

(9.3.1.7) Country/Area & River basin

Guyana

☑ Other, please specify :NA

(9.3.1.8) Latitude

6.77422

(9.3.1.9) Longitude

-58.1507

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.02

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ This is our first year of measurement

(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

0.02

(9.3.1.27) Total water consumption at this facility (megaliters)

0.02

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the NTS Amega Atlantic plant. According to the WWF Water Risk Filter, the site is located in an area with a score of 2.4 WWF, indicating a low water stress risk. 2024 is the first year in which water withdrawals have been measured, establishing a baseline for future monitoring and reporting.

Row 8

(9.3.1.1) Facility reference number

Select from:

☑ Facility 8

(9.3.1.2) Facility name (optional)

NTS- ODESSA

(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 reporting excludes sites with a small proportion of discharges, primarily warehouses and commercial offices, because they have a lower water consumption compared to the rest of the sites in the group. Data collection is prioritized at sites with significant water consumption and higher discharge volumes, which represent most of the water use in the group (approximately 94.7%). It is expected that, by 2025, discharge data from all sites will be progressively incorporated, improving the consolidation of discharge information.

(9.3.1.7) Country/Area & River basin

United States of America
☑ Other, please specify :NA

(9.3.1.8) Latitude

31.87

(9.3.1.9) Longitude

-102.26

(9.3.1.10) Located in area with water stress

Select from:
☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.2

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:
☑ This is our first year of measurement

(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

0.2

(9.3.1.27) Total water consumption at this facility (megaliters)

0.2

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the NTS Odessa plant. According to the WWF Water Risk Filter, the site is located in an area with a score of 3.2 WWF, indicating a low water stress risk. 2024 is the first year in which water withdrawals have been measured, establishing a baseline for future monitoring and reporting. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 9

(9.3.1.1) Facility reference number

Select from:

☑ Facility 9

(9.3.1.2) Facility name (optional)

NTS- HOUSTON

(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 reporting excludes sites with a small proportion of discharges, primarily warehouses and commercial offices, because they have a lower water consumption compared to the rest of the sites in the group. Data collection is prioritized at sites with significant water consumption and higher discharge volumes, which represent most of the water use in the group (approximately 94.7%). It is expected that, by 2025, discharge data from all sites will be progressively incorporated, improving the consolidation of discharge information.

(9.3.1.7) Country/Area & River basin

United States of America

☑ Other, please specify :NA

(9.3.1.8) Latitude

29.98812

(9.3.1.9) Longitude

-95.579068

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.03

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ This is our first year of measurement

(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

0.03

(9.3.1.27) Total water consumption at this facility (megaliters)

0.03

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the NTS Houston plant. According to the WWF Water Risk Filter, the site is located in an area with a score of 2 WWF, indicating a low water stress risk. 2024 is the first year in which water withdrawals have been measured, establishing a baseline for future monitoring and reporting. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 10

(9.3.1.1) Facility reference number

Select from:

☑ Facility 10

(9.3.1.2) Facility name (optional)

NTS DAMMAN, 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 reporting excludes sites with a small proportion of discharges, primarily warehouses and commercial offices, because they have a lower water consumption compared to the rest of the sites in the group. Data collection is prioritized at sites with significant water consumption and higher discharge volumes, which represent most of the water use in the group (approximately 94.7%). It is expected that, by 2025, discharge data from all sites will be progressively incorporated, improving the consolidation of discharge information.

(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)

2.58

(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

2.58

(9.3.1.27) Total water consumption at this facility (megaliters)

2.58

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

The plant, located in Saudi Arabia, presents a high water quality risk level (3.6 WWF Water Risk Filter). The WWF Water Risk Filter provides a parameter of water availability that considers not only climatological indicators, such as the duration and frequency of drought events, but also the abundance or scarcity of freshwater resources. This parameter is derived from the volume of available surface and groundwater in a specific area. The overall risk level reflects the integration of several indicators, including Water Depletion, Baseline Water Stress, Blue Water Scarcity, and Groundwater Level trends. These factors are particularly relevant as they can significantly affect business activities, leading to potential supply chain disruptions, increased operational costs and limitations on company growth. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 11

(9.3.1.1) Facility reference number

Select from:

☑ Facility 11

(9.3.1.2) Facility name (optional)

TSS NORWAY, AS.

(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 reporting excludes sites with a small proportion of discharges, primarily warehouses and commercial offices, because they have a lower water consumption compared to the rest of the sites in the group. Data collection is prioritized at sites with significant water consumption and higher discharge volumes, which represent most of the water use in the group (approximately 94.7%). It is expected that, by 2025, discharge data from all sites will be progressively incorporated, improving the consolidation of discharge information.

(9.3.1.7) Country/Area & River basin

Norway

☑ Other, please specify :NA

(9.3.1.8) Latitude

58.893236

(9.3.1.9) Longitude

5.738555

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

0.67

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ This is our first year of measurement

(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

0.67

(9.3.1.27) Total water consumption at this facility (megaliters)

0.67

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been carried out for TSS Norway. The facility does not use recycled water nor store water onsite. According to the WWF Water Risk Filter, the site is not located in a water-stressed area (score 1 WWF) and is assessed as being at low risk in terms of water quality. 2024 is the first year in which withdrawals have been calculated, providing a baseline for future monitoring. At this stage, there is no information available on discharges, however, measures will be implemented in the coming years to ensure that discharge data is collected and reported consistently. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 12

(9.3.1.1) Facility reference number

Select from:

☑ Facility 12

(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 and discharges

(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)

9.82

(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

9.82

(9.3.1.21) Total water discharges at this facility (megaliters)

5.09

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

5.09

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

4.73

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much lower

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the Salem Tubes facility. The manufacture of high-quality stainless steel and nickel alloy tubular products requires the use of water in several key processes, including cold rolling, degreasing, bright annealing, and heat treatment, to produce mechanical tubing, bars and billets, special components, instrument tubing, hydraulic tubing, aerospace applications and heat exchanger tubing. According to the WWF Water Risk Filter, the site is located in an area with a score of 1 WWF, indicating no water stress. The plant discharges into the Pennsylvanian aquifers and the Mercer Formation. The comparison with the previous year shows a significantly lower value because discharges have been measured and included in the calculation for the first time this year. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 14

(9.3.1.1) Facility reference number

Select from:

☑ Facility 14

(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 and discharges

(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)

1424.91

(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

1414.76

(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

10.15

(9.3.1.21) Total water discharges at this facility (megaliters)

1382.16

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:
☑ This is our first year of measurement

(9.3.1.23) Discharges to fresh surface water

1382.16

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

42.75

(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 extracted from the aquifer and used in a closed circuit system. According to the WWF Water Risk Filter, the drought index for the area is 1 WWF, indicating no water stress. A significant portion of the production facilities generate wastewater as part of the manufacturing process. Depending on the type, this wastewater is treated and subsequently discharged into the Schwarza River. For 2024, both consumption and discharges have been calculated based on estimated parameters, which will serve as a basis for future improvements in measurement accuracy and reporting. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 15

(9.3.1.1) Facility reference number

Select from:

☑ Facility 15

(9.3.1.2) Facility name (optional)

TUBACEX AWAJI THAILAND, 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 and discharges

(9.3.1.7) Country/Area & River basin

Thailand
☑ Other, please specify :NA

(9.3.1.8) Latitude

13.58466

(9.3.1.9) Longitude

100.64948

(9.3.1.10) Located in area with water stress

Select from:
☑ Yes

(9.3.1.13) Total water withdrawals at this facility (megaliters)

4.94

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☑ This is our first year of measurement

(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

4.94

(9.3.1.21) Total water discharges at this facility (megaliters)

4.94

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:
☑ This is our first year of measurement

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

4.94

(9.3.1.27) Total water consumption at this facility (megaliters)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.29) Please explain

Tubacex Awaji Thailand, Ltd. is located in Thailand and presents a high water quality risk level of 3.6 according to the WWF Water Risk Filter. The WWF Water Risk Filter provides a parameter of water availability that considers not only climatological indicators, such as the duration and frequency of drought events, but also the abundance or scarcity of freshwater resources. This parameter is derived from the volume of available surface and groundwater in a specific area. The overall risk level reflects the integration of several indicators, including Water Depletion, Baseline Water Stress, Blue Water Scarcity, and Groundwater Level trends. These factors are particularly relevant as they can significantly affect business activities, leading to potential supply chain disruptions, increased operational costs and limitations on company growth. 2024 is the first year in which both withdrawals and discharges have been measured and monitored at this facility, establishing a baseline for future reporting and management. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 16

(9.3.1.1) Facility reference number

Select from:

☑ Facility 16

(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 and discharges

(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)

3.96

(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

3.96

(9.3.1.21) Total water discharges at this facility (megaliters)

3.96

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

3.96

(9.3.1.27) Total water consumption at this facility (megaliters)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Lower

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the Tubacex Durant. 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 mechanical tubing, bars and billets, special components, instrument tubing, hydraulic tubing, aerospace applications and heat exchanger tubing. According to the WWF Water Risk Filter, the site is located in an area with a score of 1.5 WWF, indicating no water stress. The comparison with the previous year shows a significantly lower value because discharges have been measured and included in the calculation for the first time this year. Although the total volume of discharges is known, there is currently no information on their detailed breakdown or final destinations, therefore, the corresponding categories are reported as zero. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 17

(9.3.1.1) Facility reference number

Select from:

☑ Facility 17

(9.3.1.2) Facility name (optional)

TUBACEX TAYLOR ACCESORIOS

(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 and discharges

(9.3.1.7) Country/Area & River basin

Spain
☑ Other, please specify :Nervion River

(9.3.1.8) Latitude

43.123175

(9.3.1.9) Longitude

-3.119199

(9.3.1.10) Located in area with water stress

Select from:
☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

4.39

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:
☑ This is our first year of measurement

(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

4.39

(9.3.1.21) Total water discharges at this facility (megaliters)

4.39

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.23) Discharges to fresh surface water

3.39

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

3.39

(9.3.1.27) Total water consumption at this facility (megaliters)

0

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the TTA Artziniega plant. According to the WWF Water Risk Filter, the site is located in an area with a score of 1.6 WWF, indicating no water stress. The facility uses only municipal water and does not extract groundwater or perform any discharges outside regulated limits, so all water consumption is directly measured rather than estimated. Water is primarily used in the pickling process and for cooling in the heat treatment baths. Legionella analysis is performed and water is monitored prior to any discharge, in accordance with the discharge declaration requirements established by the Basque Government. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 18

(9.3.1.1) Facility reference number

Select from:

☑ Facility 18

(9.3.1.2) Facility name (optional)

TUBACEX TUBOS INOXIDABLES- AMURRIO

(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 and discharges

(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:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

83

(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

83

(9.3.1.21) Total water discharges at this facility (megaliters)

1.45

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☑ This is our first year of measurement

(9.3.1.23) Discharges to fresh surface water

1.45

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

81.55

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the TTI Amurrio plant. According to the WWF Water Risk Filter, the site is located in an area with a score of 1.6 WWF, indicating no water stress. The facility does not generate industrial wastewater, as any process water is reused at the Aceralava plant. The only discharges consist of sanitary wastewater from toilets. The plant uses exclusively potable water, and any unused water is sent to ACVA or TTI Llodio. Until now, discharges were released directly into the river due to the absence of a sewer collector. Currently, a collector and treatment station are under construction, with expected commissioning in 2026. 2024 is the first year in which discharges have been measured, establishing a baseline for future monitoring and reporting. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 19

(9.3.1.1) Facility reference number

Select from:

☑ Facility 19

(9.3.1.2) Facility name (optional)

TUBACEX TUBOS INOXIDABLES- LLODIO

(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 and discharges

(9.3.1.7) Country/Area & River basin

Spain

☑ Other, please specify :Nervion river

(9.3.1.8) Latitude

43.135584

(9.3.1.9) Longitude

2.968355

(9.3.1.10) Located in area with water stress

Select from:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

104.61

(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

68.22

(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

36.39

(9.3.1.21) Total water discharges at this facility (megaliters)

149.61

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:
☑ This is our first year of measurement

(9.3.1.23) Discharges to fresh surface water

149.61

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.25) Discharges to groundwater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

-45

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ Much lower

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks, and opportunities has been conducted for the TTI Llodio plant. According to the WWF Water Risk Filter, the site is located in an area with a score of 1.6 WWF, indicating no water stress. Industrial water use is metered both at the point of abstraction and at discharge, as required, while sanitary wastewater is estimated based on the number of employees and periodic analytical results. A significant portion of water is drawn directly from the river and industrial discharges are currently conveyed through a municipal sewer that empties into the river without treatment. A wastewater treatment plant is planned for construction in 2025, with operations expected to begin in 2026. Since 2023, local companies have been progressively connecting to the sewer system, aiming for full integration into the treatment network by 2025. Comparison with water consumption from the previous year shows a much lower value because discharges were accounted for the first time this year. The resulting net value is negative, indicating a net contribution to the water environment in the reporting year. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.

Row 20

(9.3.1.1) Facility reference number

Select from:

☑ Facility 20

(9.3.1.2) Facility name (optional)

TUBACEX TUBES AND PIPPES UMBARGEON

(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 reporting excludes sites with a small proportion of discharges, primarily warehouses and commercial offices, because they have a lower water consumption compared to the rest of the sites in the group. Data collection is prioritized at sites with significant water consumption and higher discharge volumes, which represent most of the water use in the group (approximately 94.7%). It is expected that, by 2025, discharge data from all sites will be progressively incorporated, improving the consolidation of discharge information.

(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:

☑ No

(9.3.1.13) Total water withdrawals at this facility (megaliters)

24.12

(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

24.12

(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)

24.12

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☑ About the same

(9.3.1.29) Please explain

An analysis of water-related impacts, dependencies, risks and opportunities has been conducted for the TTP Umbargeon plant. The facility has a high dependence on the aquifer for water consumption. According to the WWF Water Risk Filter, the risk of drought at the site is low, with a score of 3.2 WWF. NOTE: In Tubacex's internal reporting, the term "consumption" refers to water withdrawals as defined by CDP.
[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:

☑ 76-100

(9.3.2.2) Verification standard used

ISAE 3000

Water withdrawals – volume by source

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

ISAE 3000

Water withdrawals – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:
☑ 76-100

(9.3.2.2) Verification standard used

ISAE 3000

Water discharges – total volumes

(9.3.2.1) % verified

Select from:
☑ Not verified

(9.3.2.3) Please explain

This information has not been verified as it is not currently included in our reporting. It will be considered for inclusion in the 2025 reporting cycle.

Water discharges – volume by destination

(9.3.2.1) % verified

Select from:

☑ Not verified

(9.3.2.3) Please explain

This information has not been verified as it is not currently included in our reporting. It will be considered for inclusion in the 2025 reporting cycle.

Water discharges – volume by final treatment level

(9.3.2.1) % verified

Select from:

☑ Not verified

(9.3.2.3) Please explain

This information has not been verified as it is not currently included in our reporting. It will be considered for inclusion in the 2025 reporting cycle.

Water discharges – quality by standard water quality parameters

(9.3.2.1) % verified

Select from:

☑ 76-100

(9.3.2.2) Verification standard used

ISAE 3000

Water consumption – total volume

(9.3.2.1) % verified

Select from:
☑ 76-100

(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)

767540000

(9.5.2) Total water withdrawal efficiency

443249.67

(9.5.3) Anticipated forward trend

As part of its ESG Plan, TUBACEX has defined a specific target for reducing water consumption that involves optimizing intensity relative to financial value (Gross Value Added) in both industrial processes and irrigation use. The measures and targets have been defined internally, with input from experts and with an awareness of the importance of this element to stakeholders. This target is not focused on plants located in water-stressed areas but aims to reduce water intensity at group level.
[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

The products manufactured by TUBACEX do not contain hazardous substances. In the case of potential specific impacts, efforts are made to minimize the use of hazardous substances, and the necessary procedures and measures are in place to prevent environmental impacts arising from operations under normal or emergency conditions. In addition, advanced practices are implemented, such as proper storage of hazardous substances, controlled waste management, and efficient facility design to reduce environmental impacts.
[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

(9.14.1) Products and/or services classified as low water impact

Select from:

☑ No, but we plan to address this within the next two years

(9.14.3) Primary reason for not classifying any of your current products and/or services as low water impact

Select from:

☑ Important but not an immediate business priority

(9.14.4) Please explain

TUBACEX does not currently classify its products or services as low water impact. However, we acknowledge that certain manufacturing facilities within our group have significantly lower water withdrawal and discharge volumes due to their technological configuration, and water reuse practices. This presents an opportunity to preliminarily evaluate the relative water intensity of products based on their plant of origin. In the near future, we intend to explore internal methodologies for assessing water impact per product family, using available site-level water consumption data. This would allow us to identify lower-impact product lines and integrate

water considerations into our eco-design and product stewardship initiatives. While we are not yet able to make formal product-level claims, water efficiency and circularity are key priorities in our ongoing ESG roadmap.
[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

TUBACEX is aware of the importance of managing our water resources due to the impact they have on production processes. It is currently in the process of detailing the procedures and methodologies according to water use, associated risks, and measurement of its water footprint looking towards 2025.

Water withdrawals

(9.15.1.1) Target set in this category

Select from:
☑ Yes

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

03/30/2027

(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. It focuses on improving access to water, sanitation, and hygiene (WASH) in Guyana and Suriname, reaching 25 schools in Guyana and benefiting 6,000 children, as well as 4 centers in Suriname, impacting 4,200 boys and girls.

(9.15.2.14) Plan for achieving target, and progress made to the end of the reporting year

This project is part of a three-year collaboration agreement aimed at strengthening water, sanitation, and hygiene (WASH) systems, as well as implementing awareness campaigns in educational centers. As this is the first year of collaboration and no baseline values are available, the results achieved so far are considered initial. In 2024, 4.8% of the target number of children in Guyana and 12.5% in Suriname have been reached through the implemented actions. Additionally, 1.15% of the company's annual profit has been allocated to Social Action initiatives, exceeding the established goal of 1%, which demonstrates a strong commitment to social impact from the early stages of the project.

(9.15.2.16) Further details of target

As of 2024, a total of 287 children in Guyana have been reached through the WASH program, representing 4.78% of the established target. In Suriname, 150 children have benefited from the initiative, equivalent to 12.5% of the target. While these figures indicate that progress is still limited at this stage, notable advances are expected in the coming years, allowing the project to move steadily towards achieving its full impact goals. In terms of financial commitment, €482,735 have been allocated to social action initiatives in 2024 alone. This amount exceeds 1% of company profits, which was the original target set for 2030. Therefore, the performance trend for this target is ahead of expectations, demonstrating Tubacex's firm commitment to social responsibility and community development.

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

Water use efficiency

☑ Increase in water withdrawal efficiency (i.e. revenue generation per water withdrawal volume)

(9.15.2.4) Date target was set

12/30/2022

(9.15.2.5) End date of base year

12/30/2019

(9.15.2.6) Base year figure

2.3

(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

0.9

(9.15.2.10) Target status in reporting year

Select from:

☑ Achieved and maintained

(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

This assessment covers all TUBACEX Group plants, as part of its current ESG Plan, the organization has defined a specific target for reducing water consumption that involves optimizing intensity relative to financial value (Gross Value Added) in both industrial processes and irrigation use. This target is reviewed annually by calculating the water intensity parameter for the current year and observing the trend compared to previous years. The current trend is positive, as the objective has been achieved and continues to decline, with a 10% reduction compared to 2023. The methodology is based on the division of the cubic meters used (data obtained from the water supplier) divided by the Gross Value Added (GVA).

(9.15.2.15) Actions which contributed most to achieving or maintaining this target

As part of its ESG Plan, TUBACEX has set a target to reduce water consumption by optimizing water intensity relative to financial value (Gross Value Added) in both industrial processes and irrigation. The measures and targets have been defined internally, with expert input and stakeholder awareness. This target does not focus on plants in water-stressed areas but aims to reduce water intensity across the Group. Therefore, it is not linked to managing material incidents, risks or opportunities in water-stressed zones. Water intensity is the ratio of water consumption to Gross Value Added (GVA). Reducing consumption while maintaining GVA, or increasing GVA without more water use, promotes efficient resource use and lower overall consumption. Although regulations do not mandate targets here, sustainable water management remains a key pillar of TUBACEX's environmental policy, and various operational measures have been implemented to optimize its use and minimize associated impacts.

(9.15.2.16) Further details of target

TUBACEX is implementing multi-phase WASH initiative in collaboration with UNICEF, for improving access to safe water, sanitation and hygiene (WASH) services in schools. It aligns with our commitment to respect human rights and support communities in our areas of influence. The program has four key phases: -Phase 1, Partnership established: We formalized a collaboration agreement with the regional/state water utility and UNICEF to ensure institutional support, technical coordination and long-term sustainability of the WASH improvements. -Phase 2, WASH assessment completed: A comprehensive assessment was carried out in selected schools to evaluate existing WASH infrastructure, hygiene practices and areas requiring urgent intervention. -Phase 3, Infrastructure upgrades (in progress): Targeted upgrades are being implemented, including the installation and repair of water supply systems, toilets, and handwashing stations, with a focus on accessibility and gender-sensitive design. Phase 4, Education and awareness campaign (upcoming): WASH-focused educational campaign will be launched to promote long-term hygiene practices among students, teachers and the wider school community, reinforcing behavioral change and ownership. This initiative demonstrates a proactive approach to advancing SDG 6 (Clean Water and Sanitation), particularly for vulnerable children and complements our internal commitments to ensure access to safely managed WASH services across our own operations.
[Add row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☑ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☑ Other, please specify :Impacts, Risks and Opportunities assessment

[Fixed row]

(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]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

	Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity	Comment
Legally protected areas	*Select from:* ☑ No	*No activities located in or near legally protected areas*
UNESCO World Heritage sites	*Select from:* ☑ No	*No activities located in or near UNESCO World Heritage sites*
UNESCO Man and the Biosphere Reserves	*Select from:* ☑ No	*No activities located in or near UNESCO Man and the Biosphere Reserves*
Ramsar sites	*Select from:* ☑ No	*No activities located in or near Ramsar sites*
Key Biodiversity Areas	*Select from:* ☑ No	*No activities located in or near Key biodiversity areas*
Other areas important for biodiversity	*Select from:* ☑ No	*No activities located in or near other areas important for biodiversity*

[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

Environmental performance – Climate change

☑ Waste data

☑ Fuel consumption

☑ Base year emissions

☑ Electricity/Steam/Heat/Cooling generation

☑ Electricity/Steam/Heat/Cooling consumption

☑ Emissions reduction initiatives/activities

☑ Progress against targets
☑ Renewable fuel consumption
☑ Renewable Electricity/Steam/Heat/Cooling consumption
☑ Year on year change in emissions intensity (Scope 3)
☑ Year on year change in absolute emissions (Scope 1 and 2)
☑ Year on year change in emissions intensity (Scope 1 and 2)
☑ Renewable Electricity/Steam/Heat/Cooling generation
☑ Year on year change in absolute emissions (Scope 3)

(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 involves a comprehensive review of the Non-Financial Information Statement (EINF) and Corporate Sustainability Report (CSRD) Performed annually, this process confirms the reliability of the data concerning our direct operations. We offer limited assurance on the accuracy of the disclosed information, in accordance with industry standards and regulatory obligations. Although some upstream supplier data may be omitted due to challenges in obtaining complete details, the EINF verification underscores our dedication to transparency and accountability in our environmental performance.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Consolidated-Non-Financial-information-statement-2024_Tubacex.pdf

Row 2

(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

Environmental performance – Water security

☑ Water consumption– total volume

☑ Water withdrawals– total volumes

☑ Water withdrawals – volumes by source

☑ Emissions to water in the reporting year

☑ Water intensities of products and services

☑ Facilities with water-related dependencies, impacts, risks and opportunities

(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 involves a comprehensive review of the Non-Financial Information Statement (EINF) and Corporate Sustainability Report (CSRD) Performed annually, this process confirms the reliability of the data concerning our direct operations. We offer limited assurance on the accuracy of the disclosed information, in accordance with industry standards and regulatory obligations. Although some upstream supplier data may be omitted due to challenges in obtaining complete details, the EINF verification underscores our dedication to transparency and accountability in our environmental performance.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

Consolidated-Non-Financial-information-statement-2024_Tubacex.pdf
[Add row]

(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

	Additional information	Attachment (optional)
	The verification letter can be found on pages 1-8.	*Consolidated-Non-Financial-information-statement-2024_Tubacex.pdf*

[Fixed 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