

ENVIRONMENT AND CLIMATE ACTION POLICY

PURPOSE

The TUBACEX Group (hereinafter “TUBACEX” or the “Company”) integrates environmental and energy management and the sustainable transition as fundamental pillars of its corporate strategy, its responsible business model and its contribution to sustainable development.

This policy establishes the principles and commitments that guide the Group’s environmental action, in line with its Sustainability Policy, and its contribution to the objectives of the European Green Deal, the European Union Green Taxonomy, the United Nations 2030 Agenda, and the Corporate Sustainability Reporting Directive (CSRD).

Tubacex recognizes the right of all people to enjoy a clean, healthy and sustainable environment and commits to advancing towards a just transition, low-carbon and climate-resilient.

SCOPE OF APPLICATION

This Policy applies to all subsidiaries, production plants, logistics centers, and commercial offices of the Group, in all countries where it operates, as of its approval date, regardless of their geographic location, legal nature and/or level of operational dependence.

Consistently, the Company conveys its environmental and energy expectations to suppliers, contractors and business partners, promoting the progressive adoption of responsible practices throughout the value chain and, where possible, encouraging the integration of environmental criteria consistent with this Policy.

STRATEGIC COMMITMENTS

TUBACEX defines its strategic environmental commitments as the principles that guide its responsible action and its active contribution to sustainability. These commitments provide a framework for decision-making, continuous improvement and the integration of environmental criteria into all Group operations, ensuring strict compliance with all applicable environmental legislation and regulation, as well as those voluntary requirements that the organization subscribes to in the regions where it operates.

Likewise, the organization promotes going beyond such standards whenever technically and operationally possible, reinforcing a culture of responsibility and prevention.

Energy transition and climate change

The TUBACEX Group recognizes climate change as one of the greatest global challenges and assumes an active role in the transition towards a low-carbon economy. It promotes a decarbonized, resilient production model aligned with the principles of climate neutrality and energy efficiency.

- Measure and promote the gradual and continuous reduction of Scope 1, 2 and 3 greenhouse gas emissions through the establishment of science-aligned targets.
- Assess and report physical and transition risks, as well as environmental opportunities, in line with reference frameworks.
- Continuously improve energy performance, promoting efficiency, rational energy use and technological innovation.
- Progress towards the consumption of renewable electricity in all operations.
- Incorporate climate resilience and adaptation criteria into processes, facilities and investment decisions.
- Actively participate in energy transition and industrial decarbonization initiatives.

Responsible management of natural resources

TUBACEX is committed to the active protection of the environment and the prevention of pollution through the responsible management of natural resources, applying the environmental mitigation hierarchy as a guiding principle: avoid, minimize, repair and, when necessary, compensate negative impacts on ecosystems and natural resources. Specifically, it commits to applying the following measures:

- Protect the environment and prevent pollution of air, water, soil and noise, and manage waste and hazardous products appropriately.
- Maintain effective water and emissions treatment systems, ensuring compliance with and exceeding applicable environmental standards.
- Continuously improve efficiency in water use, applying recycling, reuse and consumption reduction strategies.
- Support the procurement of energy-efficient products and services that contribute to improving the Group's energy performance.

Circular economy and efficient use of resources

With the aim of establishing a framework to promote the circular economy and the full utilization of the entire production process, the TUBACEX Group commits to:

- Promote circularity by increasing, as far as possible, the use of recycled materials and promoting the reuse, recovery and recycling of waste throughout its entire value chain.
- Minimize, as far as possible, the generation of all types of waste, avoiding its generation at source.

- Adopt the necessary measures to improve the efficiency of the use of raw and auxiliary materials.
- Promote collaboration with universities, technology centers and customers to advance circular and low-carbon solutions.
- Promote research and development of clean technologies, sustainable materials and innovative solutions to reduce environmental footprint.

Protection of biodiversity and ecosystems

TUBACEX recognizes biodiversity as an essential environmental asset for the sustainability of the planet. Its commitment focuses on conserving natural ecosystems and ensuring that industrial operations are carried out respecting the ecological balance of the environments in which it operates.

- Protect and preserve biodiversity through the implementation of measures that avoid or minimize the impact of industrial activity on the ecosystems in which it operates, ensuring the prevention of deforestation and the degradation of natural habitats, and promoting responsible land and natural resource management practices.
- Convey to the value chain these requirements for the protection of any area of national or international biodiversity.
- Assess potential impacts arising from changes in the Group's activities, applying the mitigation hierarchy: avoid, minimize, repair and compensate.

MANAGEMENT AND CONTINUOUS IMPROVEMENT

TUBACEX is committed to ensuring continuous improvement of environmental performance and an adequate and effective deployment of the above commitments through the use of measures and tools within its reach:

- Environmental Emergency Plan: TUBACEX will maintain and periodically review an Environmental Emergency Plan, ensuring a rapid, coordinated and effective response to any incident with potential impact on the environment.
- Continuous improvement: Ongoing pursuit of the optimization of industrial processes with a focus on improving environmental performance. Likewise, the best available technologies and advanced practices in these matters are implemented to minimize the resulting environmental impacts without compromising the quality of the manufactured products.
- Measurement and monitoring, including transparency and reporting, through periodic indicators and the annual publication of the Sustainability Report.
- Training and awareness: Train all TUBACEX employees on the importance of contributing to the commitments defined in this policy and the implementation of associated good practices and measures.

- Collaboration and value chain, promoting the adoption of sustainable practices in resource consumption, emissions control, waste management and energy efficiency.

GOVERNANCE AND RESPONSIBILITIES

The application of this Policy is articulated through a governance model that defines the functions and responsibilities of the different bodies and levels of the organization:

- Board of Directors: approves the Policy, ensures compliance and periodically monitors the associated results. It ensures the integration of its principles into the general corporate governance framework and the Group's strategy.
- Sustainability and Good Governance Committee: oversees the effective implementation of the Policy, analyzes progress and associated risks and submits recommendations to the Board of Directors, ensuring appropriate accountability.
- Sustainability Department: drafts, reviews and updates the Policy, coordinates its implementation and ensures technical consistency with the rest of the corporate policies and procedures. It also compiles and consolidates the information necessary to monitor the associated indicators and commitments and coordinates its transparent and verifiable communication through the annual sustainability report.
- Senior Management: drives the implementation of the Policy throughout the organization, ensuring the availability of the material, human and financial resources necessary for its execution. It also periodically assesses the associated performance, ensures its integration into management and decision-making processes, and promotes compliance with the commitments established in this policy.
- Plant management, operational management and corporate areas: are responsible for the effective implementation, day-to-day execution and compliance with the principles and commitments set out in the Policy, integrating them into their processes, decisions and management systems. They provide the information necessary for monitoring, evaluation, continuous improvement and communication and reporting.

REVIEW AND CONTINUOUS IMPROVEMENT

The TUBACEX Group maintains a systematic process of review and continuous improvement of its environmental performance, ensuring the effectiveness, relevance and ongoing adequacy of this Policy and the associated management system. To this end, the company:

- Periodically evaluates results obtained through performance indicators, internal and external audits, legal compliance assessments and specific reviews of the management system.
- Conducts a Management Review, analyzing achievements, opportunities for improvement and the adequacy of allocated resources.
- Incorporates lessons learned into action plans.
- Reviews and updates this Policy and strategic objectives periodically, at least every two years, or earlier if significant changes occur in the regulatory, strategic or operational context that recommend doing so.
- Communicates results to all people in the Group and relevant stakeholders, ensuring transparency, accountability and continuous improvement of performance.

These activities ensure that the Policy remains current, applicable and consistent with corporate commitments, regulation and stakeholders' expectations.

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