

EQUAL OPPORTUNITIES, NON-DISCRIMINATION AND INCLUSION POLICY

The Tubacex Group (hereinafter “TUBACEX” or “the Company”), in line with its corporate values and the commitments set out in its Human Rights Policy, reaffirms its firm commitment to equal opportunities, non-discrimination and inclusion as fundamental principles guiding its conduct.

This Policy establishes the principles and commitments that guide the promotion of equal treatment and opportunities, the prevention of discrimination and the consolidation of an inclusive and respectful culture across all activities, territories and hierarchical levels of the organization.

SCOPE OF APPLICATION

This Policy is mandatory for all subsidiaries, investees, production facilities and commercial offices that make up the TUBACEX Group, regardless of their geographic location, as of the date of its approval.

Likewise, its principles and commitments are conveyed to business relationships, suppliers, contractors and relevant business partners.

REGULATORY FRAMEWORK

This Policy is applied in line with the main international and European frameworks on human rights, equality and sustainability, especially the Universal Declaration of Human Rights, ILO Conventions, the UN Guiding Principles on Business and Human Rights, the United Nations Global Compact and the European CSRD and CSDDD Directives, as well as the United Nations 2030 Agenda.

GUIDING PRINCIPLES

- Equal treatment and opportunities: ensure that all people are treated fairly and with respect, without any discrimination.
- Equity: recognize individual differences and ensure that internal policies and management processes promote real and effective equality.
- Inclusion: build open, collaborative and safe working environments in which all people can fully develop.

- Zero tolerance for discrimination, harassment or any form of violence at work.

OBJECTIVE AND COMMITMENTS

TUBACEX is committed to full equality both in relation to relationships among people within the company itself and in relationships between them and other people, entities and/or third parties external to it.

As stated in the Company's Code of Conduct, in section 4.2 "We respect each other":

- We will ensure an environment in which equal opportunities apply to all people.
- We will ensure that there is no place for any type of discrimination.
- We will strive for a working environment that promotes dignity and respect, rejecting any manifestation of violence, abuse of authority and intimidation, and with particular sensitivity towards less represented or more vulnerable groups.

In this regard, it assumes the following commitments to ensure an inclusive, equitable and respectful working environment:

Equality and non-discrimination

- Ensure equal treatment and opportunities in access to employment, training, promotion, remuneration and work-life balance.
- Ensure equal pay for work of equal value and pay transparency.
- Prevent any form of direct or indirect discrimination, whether based on gender, age, origin, nationality, sexual orientation, gender identity or expression, disability, religion, beliefs or any other personal or social condition.
- Incorporate a gender perspective and intersectional diversity into all management and decision-making processes.
- Identify, prevent and correct possible inequalities or structural barriers, promoting an inclusive and equitable environment that supports the personal and professional development of all employees.

Safe environments free from harassment

- Promote diversity and eliminate any form of discrimination, direct or indirect, including digital harassment, based on gender, age, origin, nationality, sexual orientation, gender identity or expression, disability, religion, beliefs or any other personal or social condition, promoting inclusive and respectful work environments.
- Enable a universal and global channel, the whistleblowing channel, ensuring accessibility, confidentiality and protection of the complainant against retaliation.
- Ensure a defined and confidential escalation process for managing harassment or discrimination incidents, with different levels of responsibility and clear action protocols.
- Adopt proportionate corrective or disciplinary measures in cases of discriminatory or harassing conduct, in accordance with the Code of Ethics and the applicable legal framework.

Training and awareness

- Implement training for all employees on the prevention of discrimination and harassment in the workplace, as well as on diversity and inclusion.
- Offer specific training programs for leaders and middle managers to promote inclusive team management and prevent unconscious bias.
- Regularly evaluate the effectiveness of training programs and integrate results into annual continuous improvement plans.

Diversity, accessibility and work-life balance

- Ensure universal accessibility by eliminating physical, technological and attitudinal barriers, adapting facilities, processes and tools.
- Promote generational and cultural diversity, fostering collaboration and the exchange of experiences in multinational environments.

- Facilitate work-life balance, promoting co-responsibility, flexibility and organizational wellbeing policies.

Inclusive communication

- Use inclusive language in all corporate communications and institutional materials.
- Represent the diversity of the Group's people in campaigns, training and awareness materials, avoiding stereotypes or biases.

GOVERNANCE AND RESPONSIBILITIES

The correct implementation and effectiveness of this policy requires a clear distribution of functions and responsibilities at all levels of the organization:

- Chief Executive Officer: approves the Policy, ensures compliance and periodically monitors the associated results. Ensures the integration of its principles into the Group's strategy.
- Sustainability Department: drafts, reviews and updates the Policy, and ensures technical consistency with the rest of the corporate policies and procedures.
- 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.
- People Department: coordinates its implementation, 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.

REVIEW AND CONTINUOUS IMPROVEMENT

The TUBACEX Group maintains a systematic process of review and continuous improvement of its performance in social action matters.

- Periodically evaluates results obtained through performance indicators.
- 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.

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