

SUPPLIER CODE OF CONDUCT

INTRODUCTION

The Tubacex Code of Conduct for Manufacturers and Suppliers (hereinafter, the Code) defines the minimum standards of ethical and responsible behaviour that must be met by all manufacturers and suppliers of the products commercialized by Tubacex in the course of its business, in line with the corporate culture of Tubacex Group (hereinafter Tubacex), firmly based on the respect for Human and Labour Rights.

Tubacex undertakes to allocate the appropriate resources so that manufacturers and suppliers are acquainted with and understand this Code and are able to ensure its compliance.

The Code shall be applied to all manufacturers and suppliers that take part in the purchasing, manufacturing and finishing processes and is based upon the following general principles that define Tubacex's ethical behaviour:

- All Tubacex's operations are developed under an ethical and responsible perspective.
- All individuals and entities, who maintain, directly or indirectly, any kind of employment, economic, social and/or industrial relationship with Tubacex, are treated fairly and with dignity.
- All Tubacex's activities are carried out in a manner that most respects the environment.

This Code is part of Tubacex's broader commitment to sustainability, ethical sourcing, and supplier responsibility. Compliance with this Code is required alongside the following related policies:

- Sustainable Procurement Standard
- Responsible Sourcing Standard (Conflict Minerals)
- Supplier Non-Compliance Standard

NO FORCED LABOUR

Tubacex shall not allow any form of forced or involuntary labour in their manufacturers and suppliers. They may not require their employees to make any kind of "deposits", nor are they entitled to retain employee's identity documents.

NO CHILD LABOUR

Manufacturers and suppliers shall not employ minors. Tubacex defines minors as those persons who have not yet reached their 16th birthday. In cases where local legislation stipulates a higher minimum age, the higher limit shall apply.

Persons with the ages between 16 and 18 years will be considered young workers. Young workers shall not work during night hours or in hazardous conditions.

NO DISCRIMINATION

Manufacturers and suppliers shall not apply any type of discriminatory practice in recruitment, compensation, access to training, promotion, termination of employment, or retirement, based on race, caste, creed, nationality, religion, age, physical or mental disability, marital status, sexual orientation, union membership, or political affiliation.

All workers shall be treated with fairness, dignity, and respect, in line with the principles of equal opportunity and inclusion.

Gender equality and diversity shall be addressed as outlined in the “Gender Equality and Inclusion” section of this Code.

The Customer and the Supplier may agree ad hoc modifications to the GPT&C (General Purchasing Terms and Conditions) that are deemed necessary or convenient in the event that the order is of a special nature or if specific circumstances apply. These modifications should be set out in writing in a separate document and signed by both parties.

GENDER EQUALITY AND INCLUSION

Tubacex promotes gender equality and diversity as key principles of ethical and sustainable business conduct.

Suppliers shall actively ensure fair representation of women and other underrepresented groups at all organizational levels, including leadership and decision-making roles.

They shall adopt and maintain policies and practices that eliminate gender bias in recruitment, promotion, compensation, and access to training or career development.

Suppliers are encouraged to set measurable objectives, collect and monitor relevant data, and regularly assess progress toward gender balance and inclusion within their workforce and supply chains.

Tubacex encourages its suppliers to foster inclusive workplace cultures that value diverse perspectives and enable equal opportunities for all individuals, regardless of gender identity or expression.

RESPECT FOR FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Manufacturers and suppliers shall ensure that their employees, without distinction, have the right of association, union membership and collective bargaining. No retaliation may arise from the exercise of such right and no remuneration or payment whatsoever may be offered to the employees in order to hinder the exercise of such a right. Likewise, they shall adopt an open and collaborative attitude towards the activities of Trade Unions.

Workers' representatives shall be protected from any type of discrimination and shall be free to carry out their representative functions in their workplace.

Where the rights to Freedom of Association and Collective Bargaining are restricted under law, the appropriate channels to ensure a reasonable and independent exercise of such rights must be designed.

NO HARSH OR INHUMANE TREATMENT

Tubacex shall not allow any form of forced or involuntary labour in their manufacturers and suppliers. They may not require their employees to make any kind of "deposits", nor are they entitled to retain employees' identity documents.

SAFE AND HYGIENIC WORKING CONDITIONS

Manufacturers and suppliers shall provide a safe and healthy workplace to their employees, ensuring minimum conditions of light, ventilation, hygiene, fire prevention, safety measures and access to a drinking water supply.

Workers shall have access to clean toilet facilities and drinking water. Where necessary, facilities for food storage shall be provided.

Accommodation, where provided, shall be clean and safe. Manufacturers and suppliers shall take the required steps to prevent accidents and injuries to health of their workers, by minimizing as much as possible the risks inherent to work.

Manufacturers and suppliers shall provide their workers with regular training in the matter of health and safety at work. The company shall keep an appropriate record of the training courses done. Likewise, they shall appoint a person in charge of health and safety within the Management, duly authorized and with the appropriate decision-making power.

In addition, suppliers shall establish structured training and awareness programs for employees covering health, safety, environment, and ethical conduct. Where suppliers operate in nuclear, aerospace, or other safety-critical industries, such programs must

explicitly include nuclear safety culture, risk prevention, and continuous improvement practices in line with recognized international standards.

EMERGENCY PREPAREDNESS AND LEGAL COMPLIANCE

Suppliers shall develop, maintain, and regularly test emergency preparedness and response plans for incidents (fire, chemical spills, accidents, natural disasters).

Suppliers must comply with all applicable laws and provide evidence of compliance upon request (permits, certifications, audit reports).

EMPLOYEE PARTICIPATION AND CONSULTATION

Suppliers shall ensure mechanisms are in place to promote active worker participation and consultation on health, safety, and environmental issues. Workers must have the right to raise concerns, propose improvements, and participate in dialogue on workplace safety and sustainability practices without fear of retaliation.

WAGES ARE PAID

Manufacturers and suppliers shall ensure that wages paid meet at least the minimum legal or collective bargain agreement, should this latter be higher. In any event, wages should always be enough to meet at least the basic needs of workers and their families and any other which might be considered as reasonable additional needs.

Manufacturers and suppliers shall not make any withholdings and/or deductions from wages for disciplinary purposes, nor for any reasons other than those provided in the applicable regulations, without the express authorization of workers. Likewise, they shall provide all workers with written and understandable information about their wage's conditions upon their recruitment, and detailed information about the particulars of their wages every time that these are paid.

Manufacturers and suppliers shall also ensure that wages and any other allowances or benefits are paid on time and are rendered in full compliance with all applicable laws and specifically, that payments are made in the manner that best suits the workers.

WORKING HOURS ARE NOT EXCESSIVE

Manufacturers and suppliers shall adjust the length of the working day to the provisions of the applicable laws or of the collective bargain agreement applicable for the sector in question, if the latter affords greater protection for the workers.

Manufacturers and suppliers shall not require their employees to work, as a rule of thumb, in excess of 48 hours a week and workers shall be granted at least one day off for every calendar day period on average.

Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate, pursuant to the provisions of the prevailing regulations in force.

REGULAR EMPLOYMENT

Manufacturers and suppliers undertake that all the employment formulas they use are part of the applicable local laws. Thus, they shall not impair the rights of workers acknowledged under labour and social security laws and regulations by using schemes that have no real intention to promote regular employment in the framework of regular employment relationships.

TRACEABILITY OF PRODUCTION

Manufacturers and suppliers shall not assign any work to third parties without the prior written authorization of Tubacex. Those who outsource any work shall be responsible for the enforcement of the Code by these third parties and their employees.

Suppliers shall extend the principles of this Code to their own suppliers, subcontractors, and business partners, ensuring that responsible practices are upheld consistently throughout the supply chain. Likewise, manufacturers and suppliers shall apply the principles of this Code to any homemaker involved in their supply chain, and shall give transparency to the locations and working conditions of said homeworkers.

In addition, suppliers must ensure complete traceability of all supplied materials, supported by Certified Material Test Reports (CMTRs) or equivalent documentation. Control of qualified/unqualified source materials and prevention of unauthorized substitution or outsourcing are mandatory.

RESPONSIBLE SOURCING OF RAW MATERIALS

Suppliers must assess and mitigate environmental and human rights risks in their raw material supply chains. This includes avoiding materials linked to armed conflict, corruption, forced labor, or environmental harm.

Suppliers are required to comply with all applicable legislation and international standards governing the responsible sourcing of minerals, including but not limited to:

- The EU Conflict Minerals Regulation (EU) 2017/821, and

- The U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, where applicable.

Suppliers shall implement due diligence processes consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, maintaining documentation demonstrating the origin and chain of custody of tin, tantalum, tungsten, and gold (3TG), as well as other critical or strategic materials.

Such documentation must be retained for a minimum of five (5) years and made available to Tubacex upon request.

Compliance with Tubacex's Responsible Sourcing Standard and traceability requirements is mandatory.

HEALTH AND SAFETY OF PRODUCTS

Suppliers must actively contribute to counterfeit prevention measures, ensuring that only certified and authentic products are delivered. Any suspected counterfeit materials must be reported immediately to Tubacex.

ENVIRONMENTAL AWARENESS

Suppliers must:

- Comply with all applicable local, national, and international environmental laws and regulations, as well as with Tubacex's internal environmental requirements.
- Fulfil all internal and external audit obligations specified in the purchase order (including aerospace and other regulated sectors).
- Implement effective environmental management practices to minimize environmental impacts, including emissions, water consumption, and waste generation.
- Promote and integrate circular economy principles, resource efficiency, and biodiversity protection into their operations.
- Where applicable, establish and pursue science-based environmental targets, and disclose performance data in a transparent manner.
- Ensure that all operations and facilities comply with local environmental laws and permit requirements, maintaining evidence of such compliance and making it available upon request.

CONFIDENTIALITY OF INFORMATION

Manufacturers and suppliers shall preserve the integrity and confidentiality of the information they may receive as a consequence of their commercial relationship with Tubacex.

The obligation of confidentiality will remain once the relation with Tubacex is terminated and it will include the obligation to return any material related to the company held by the manufacturer or supplier.

CODE IMPLEMENTATION

Manufacturers and suppliers shall implement and maintain programmes to set in motion this Code. They shall appoint a senior member of Management who shall be responsible for the implementation and enforcement of this Code.

Manufacturers and suppliers shall communicate the Code to all employees and those involved in any way in the Tubacex Supply Chain.

A copy of the Code, translated into the local language, shall be displayed in accessible locations to all workers.

Suppliers shall establish and maintain an integrated management system covering quality, environment, health, and safety. This system must ensure that processes are documented, monitored, and continuously improved in line with international standards (ISO 9001, ISO 14001, ISO 45001, ISO 19443, EN 9100).

Manufacturers and suppliers must provide formal written acceptance of this Code of Conduct prior to the establishment or renewal of any commercial relationship with Tubacex. Acceptance may be documented via signature, digital acceptance systems, or any other verifiable means.

Tubacex reserves the right to treat non-acceptance of the Code as grounds for disqualification or suspension from the supplier base.

Transparency

Manufacturers and suppliers shall carry out their activities in an honest, upright and transparent way, keeping for these purposes an appropriate accounting records system that facilitates the traceability of their decisions, as a preventive measure versus any type of corruption, bribe and extortion that might arise.

Manufacturers and suppliers shall not manipulate or influence their workers, nor shall they forge any files or records in order to alter the verification process regarding compliance with this Code.

Manufacturers and suppliers shall neither offer nor accept remuneration of any kind which seeks, or may be perceived to seek, to affect the impartial judgment or the objectivity of such parties appointed by Tubacex to carry out inspections and compliance audits in connection with this Code.

Reference to national legislation

The provisions of this Code constitute only minimum standards.

Should national regulations or any other applicable Law or any other commitments undertaken or applicable, including collective bargaining agreements, govern the same issue, the provision which offers greater protection for workers shall apply.

Verification of compliance with the Code

Manufacturers and suppliers shall authorize Tubacex and/or any third parties the former might appoint, to monitor the appropriate enforcement of the Code. For these purposes, they shall provide the required means and the appropriate access to the facilities and documentation required to ensure this verification.

Tubacex reserves the right to request and review suppliers' conflict mineral due diligence documentation and supporting evidence at any time. Failure to maintain adequate documentation or to comply with applicable conflict mineral regulations may result in corrective actions, suspension, or termination of the business relationship.

Non-Compliance and Corrective Action

As outlined in the Supplier Non-Compliance Standard, Tubacex may take the following actions in response to Code violations:

- Request a Corrective Action Plan (CAP).
- Temporarily suspend supplier status.
- Conduct additional audits or investigations.
- Terminate supplier agreements for severe or repeated breaches.

Grievance and Whistleblower Mechanism

Suppliers must provide their employees with accessible, non-retaliatory grievance mechanisms. Additionally, any stakeholder may report potential violations of this Code via the Tubacex Ethics Channel:

responsiblesourcing@tubacex.com

APPROVAL AND REVIEW

The Corporate Procurement team will oversee periodic reviews of this standard, incorporating stakeholder feedback as well as updates from industry experts, regulatory frameworks, and international best practices.

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