CONSOLIDATED NON – FINANCIAL STATEMENT

FINANCIAL YEAR 2025

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Executive Summary

Introduction

In a global context marked by the energy transition, industrial transformation and increasing regulatory and social demands, Tubacex consolidates in 2025 its sustainable growth model, integrating sustainability as a cross-cutting axis of its business strategy, its business model and its decision-making.

As an industrial group specialised in advanced tubular solutions in stainless steel and high-performance alloys, Tubacex operates in critical sectors where operational excellence, technological innovation and the responsible management of environmental, social and governance (ESG) impacts are determining factors for long-term competitiveness.

This Sustainability Report shows how Tubacex transforms environmental, social and regulatory challenges into levers for competitiveness, resilience and value creation, in alignment with the NT2 Strategic Plan.

Sustainability integrated into the strategy

The Tubacex Sustainability Plan constitutes the operational framework that translates the corporate strategy and the NT2 Strategic Plan into specific objectives, projects and indicators in the environmental, social and governance fields. The definition of strategic priorities in terms of sustainability is based on the annual double materiality analysis carried out in accordance with the European Sustainability Reporting Standards (ESRS), which makes it possible to identify the most relevant impacts, risks and opportunities both from the perspective of the environment and in terms of their potential financial effect on the Group.

This exercise, validated by the governing bodies and aligned with the corporate risk management model, covers upstream and downstream phases of the Tubacex value chain, from the sourcing of raw materials and energy to the sale and distribution phase of the products by customers. In this way, the Company obtains a comprehensive view of its main dependencies, regulatory exposures and value creation opportunities in a context of energy transition and industrial transformation.

This Plan is structured around four priority pillars, aligned with the main impacts, risks and opportunities identified in the double materiality analysis and with the priorities of the steel sector. The monitoring of the Sustainability Plan is carried out through a specific governance structure, under the supervision of the Board of Directors and its delegated committees, and with indicators integrated into internal control and incentive systems.

Relationship between the Sustainability Plan and the European Sustainability Reporting Standards (ESRS) resulting from the materiality analysis:

Pillars of the Sustainability Plan	Priority SDGs*	European Sustainability Reporting Standards (ESRS)	Material sub-topics
Pillar 1 Advancing towards neutrality and enhancing the circularity of the business	SDG 7 SDG 12 SDG 13	ESRS E1: Climate Change ESRS E2: Pollution ESRS E3: Water and marine resources ESRS E5: Circular Economy	• Climate change mitigation • Climate change adaptation • Energy • Pollution of water, air and soil • Water • Resource inflows • Resource outflows • Waste
Pillar 2 Contributing to the development of innovative solutions for the energy transition	SDG 9 SDG 7 SDG 13	ESRS G1: Specific from the company	

Pillars of the Sustainability Plan	Priority SDGs*	European Sustainability Reporting Standards (ESRS)	Material sub-topics
Pillar 3 Caring for our people and local communities	SDG 3 SDG 4 SDG 5 SDG 8	ESRS S1: Own workforce ESRS S2: Workers in the value chain ESRS S3: Affected communities	• Working conditions • Secure employment • Working time • Adequate wages • Social dialogue • Freedom of association • Collective bargaining • Work-life balance • Equal treatment and opportunities • Gender equality • Training and development • Employment and inclusion • Diversity • Other labour rights • Child labour • Forced labour • Adequate housing • Privacy
Pillar 4 Doing the right thing and fostering transparency	SDG 16 SDG 17	ESRS G1: Governance	• Corporate culture • Whistleblower protection • Management of relationships with suppliers, including payment practices • Corruption and bribery

Table 1: Pillars of the Sustainability Plan

**The selection of SDGs has been made based on their material relevance to the Group's industrial activity and is not intended to cover exhaustively all the Sustainable Development Goals.*

These areas have a cross-cutting impact on competitiveness, operational resilience and the ability to access markets and financing in an environment that is increasingly demanding in regulatory and reputational terms.

The systematic consideration of these factors in planning and decision-making processes enables Tubacex to anticipate physical and transition risks — including those associated with the evolution of the climate regulatory framework, energy volatility or traceability requirements in the supply chain — and, at the same time, to strengthen its positioning in lower-carbon and higher value-added technological segments.

In line with these material areas, Tubacex structures its strategic priorities around lines of action that respond in an integrated manner to the main impacts, risks and opportunities identified. The progressive decarbonisation of the business, the promotion of circular models, the development of technological solutions for the energy transition, the strengthening of human capital and the consolidation of a robust framework of ethics and good governance constitute the levers through which the Company articulates its strategic response. This approach ensures operational continuity with the conclusions of the materiality analysis, translating them into the management model and into the evolution of the business in the medium and long term.

PILLAR 1.

Promoting circularity and climate neutrality

Decarbonisation constitutes one of the strategic pillars of Tubacex's sustainability model, in a context in which the steel sector faces significant challenges arising from its high energy and carbon intensity. The Group addresses this challenge through a Climate Transition Plan aligned with the Paris Agreement and with emissions reduction targets validated by the Science Based Targets initiative (SBTi), which cover scopes 1, 2 and 3, with a climate neutrality horizon set for 2050.

Tubacex's approach is based on a progressive strategy, combining the direct reduction of emissions in its industrial processes with the transformation of the energy mix and the promotion of circular models. The main decarbonisation levers are:

- Energy efficiency and improvement of industrial processes. The improvement of energy efficiency constitutes the main lever for the reduction of Scope 1 and 2 emissions. Tubacex has prioritised investments in its facilities with the greatest impact — particularly the steel mill — aimed at optimising furnaces, combustion systems, heat recovery, automation and advanced process control. These actions enable a structural reduction in energy consumption per unit of production, while at the same time reinforcing the Group's operational competitiveness.

- Transition of the energy mix towards renewable sources. The second key lever is the progressive decarbonisation of energy consumption through the increased use of electricity from renewable sources. The Group combines long-term power purchase agreements (PPAs), the expansion of green electricity supply across different geographies and the progressive replacement of higher-impact sources with renewable energy, adapting its strategy to the regulatory and market conditions of each country.

These levers enable Tubacex to reduce its energy and carbon intensity, safeguard its industrial competitiveness and anticipate the regulatory impact arising from the EU ETS, CBAM and the evolution of carbon pricing.

Decarbonisation is also managed from a financial and regulatory risk perspective. Tubacex integrates climate change-related risks — including those derived from the EU ETS, CBAM and the evolution of carbon prices — into its strategic planning processes, investment analysis and risk management, using tools such as an internal carbon price to guide decision-making.

The Company has also strengthened the control of other environmental impacts relevant to the sector, such as atmospheric emissions, water management in water-stressed areas and pollution prevention, relying on certified management systems, investments in best available techniques and continuous monitoring of regulatory compliance.

Main milestones achieved in 2025:

Climate change	• Update of the model for identifying environmental impacts, risks and opportunities (IROs), strengthening the double materiality approach and its alignment with the requirements of the CSRD. • Update and approval by the Board of Directors of the Environmental and Climate Action Policy, consolidating the corporate framework for climate management. • Achievement of a CDP Climate Change score of A (Leadership), positioning Tubacex among leading companies in terms of transparency and climate change management.
Fuels	• Maintenance of renewable energy power purchase agreements (PPAs) at the Spanish plants, ensuring security of supply and a structural reduction in Scope 2 emissions. • Increase in the use of electricity from renewable sources at the Italian plants, reaching approximately 50% of the electricity supply. • Replacement of energy from nuclear sources with energy from renewable sources at the Salem plant (United States), improving the Group's energy mix.
Circular economy	• Consolidation of the management and recovery model for industrial waste, particularly steelmaking slags, progressing towards a gradual reduction in landfill disposal and greater circularity in the production process.

Table 2: (PILLAR 1) Main milestones achieved in 2025

Evolution of the main indicators:

Indicator	2019	2024	2025	Objetivo 2030
GHG emissions Scope 1+2 (tCO_2e, market-based)	140,130	62,435	55,391	49,900
GHG emissions Scope 3 – Total (tCO_2e/GVA)	1.86	1.08	1.25	0.83
Energy intensity (MWh/GVA)	2.85	1.50	1.50	2.23
% electricity from renewable sources	0%	32%	35%	40%
% recycled / recovered waste	60.50%	82.3%	82.2%	95%

Table 3: (PILLAR 1) Evolution of the main indicators.

PILLAR 2.

Developing innovative solutions for the energy transition

The energy transition not only transforms industrial processes, but also the portfolio of products and services. In 2025, Tubacex has consolidated its positioning in key low-emission technologies, progressing towards a structural diversification of the business.

The Company actively participates in the development of solutions related to hydrogen, CO_2 capture and storage, alternative fuels and other emerging technologies, both to enable the future reduction of its own emissions and to support its customers in their decarbonisation processes.

Main milestones achieved in 2025:

New Markets	• Consolidation and expansion in strategic low-emission markets, with a direct impact on portfolio diversification. • Hydrogen (components for electrolysers, materials and integrated solutions). • Carbon capture and storage (CCUS). • Green ammonia and urea. • Biofuels, synthetic fuels and bioplastics. • Advanced nuclear energy (SMRs).
Technological transformation of the steel industry	• Development and implementation of high-impact solutions aimed at: • Reducing emissions at the main industrial sources. • Increasing efficiency and operational competitiveness.
Circular economy and new business models	• Development of new business activities based on: • Development of proprietary technologies. • Collaboration with start-ups. • Circular and sustainable models.

Evolution of the main indicators:

Indicator	2024	2025	Objectives
R&D&I efforts in the energy transition	31%	51%	65% to 2030
Sales to low-carbon segments (€ million)	55.6	60.8	75 to 2027

Table 5: (PILLAR 2) Evolution of the main indicators

PILLAR 3.

Caring for our people and the surrounding environment

Employees constitute one of Tubacex's main strategic assets. Their proper management is a critical factor for operational continuity and the execution of the Group's strategy in a highly specialised industrial environment.

In 2025, the Group has a global workforce of more than 2,700 people, diverse in geographical and cultural terms, and with a strong industrial component. Ensuring their safety, well-being and professional development is an absolute priority.

Occupational health and safety remains a critical management pillar, supported by advanced preventive systems, international certifications and clear objectives for reducing accident rates. At the same time, Tubacex has continued to promote continuous training, the reskilling of industrial profiles and talent development as key elements to address the technological and energy transition in a fair manner.

In terms of diversity, equality and non-discrimination, the Company has taken a significant step with the update in 2025 of its Equal Opportunities Policy, strengthening its commitment to reducing the gender pay gap, promoting female leadership and fostering the inclusion of underrepresented groups in a traditionally male-dominated sector. These commitments are integrated into people management processes and are monitored through specific indicators and action plans.

Tubacex's link with the territories in which it operates forms an essential part of its industrial identity. Beyond regulatory compliance and job creation, the Company promotes initiatives with a positive social impact through its Social Action Policy and, in particular, through the Tubacex Foundation, which channels projects in areas such as education, training, social inclusion and community development.

This commitment reinforces the Group's social licence to operate and contributes to the generation of shared value, especially in industrial environments where the Company's activity has a significant economic and social impact.

Main milestones achieved in 2025:

Health and safety	• Progress in the corporate model for the consolidation of Health and Safety indicators, improving the quality, comparability and monitoring of information. • Promotion of specific Health and Safety improvement projects across the Group's different plants. • Approval by the Board of Directors of the new Health and Safety Policy, strengthening the preventive framework and the corporate commitment to the protection of people.
Human rights	• Approval by the Board of Directors of the new General Human Rights Policy, aligned with the United Nations Guiding Principles, the OECD Guidelines and forthcoming due diligence requirements. • Progress in the implementation of the corporate human rights due diligence model, integrating this approach into business management.
Training	• Consolidation of the corporate training and e-learning platform, facilitating consistent access to training and the development of key capabilities for the technological and industrial transition.
Diversity	• Progress in equality plans and in the analysis of the gender pay gap, strengthening the progressive management of equal opportunities in a traditionally male-dominated industrial sector.
Local communities	• Approval of the new Social Action Policy, establishing a common strategic framework for the Group's social contribution and its alignment with the sustainability strategy. • Development of social initiatives linked to the territories in which the Group operates, promoting the creation of shared value in industrial environments. • Strengthening of the role of the Tubacex Foundation as the main vehicle for channelling the Group's social action, promoting impactful projects in education, inclusion and community development. • Integration of social action and engagement with local communities within Tubacex's overall ESG approach, ensuring consistency between business, sustainability and social contribution.

Table 6: (PILLAR 3) Main milestones achieved in 2025

Evolution of the main indicators

Indicator	2019	2024	2025	Objective
Total employees	2,553	2,766	2,786	-
% permanent contracts (FTE)	92%	93%	94%	-
Accident frequency rate (*)	100	36,5	38,6	25
Accident severity rate (*)	100	40,6	40,6	25
% women in the workforce	13%	14%	14%	-
Women in senior management	0	9%	18%	40%
Average training hours	13.7	12.3 h	21.28	15h/fte

Table 7: (PILLAR 3) Evolution of the main indicators

**The indicator is calculated on a base of 100, with a target of a 75% improvement, the indicator representing the progress achieved.*

PILLAR 4.

Ethics and good governance

Sustainability at Tubacex is fully integrated into the corporate governance structure and into control and oversight systems. During 2025, the Company has strengthened this model through the consolidation of a system for the control and supervision of sustainability information, aligned with the requirements of the CSRD, which enhances the reliability of ESG data and reduces the risks associated with inconsistent or non-verifiable disclosure; and through the integration of ESG indicators into incentive systems.

A key element of this progress has been the review and update of the corporate sustainability policy framework in December 2025, providing the Group with a coherent, consistent framework aligned with international best practices in environmental, social and governance matters. This set of policies — which includes sustainability, environment, human rights, equality, ethics and compliance — constitutes the foundation upon which the responsible management of the business and accountability to stakeholders are built.

Main milestones achieved in 2025:

Corporate governance and oversight	• Active oversight of ESG matters by the Board of Directors, integrating sustainability into the Group's strategic decision-making.
Policy framework	• Comprehensive review and update of the corporate ESG policy framework in December 2025, strengthening its consistency, relevance and alignment with international standards.
Incentives and performance	• Integration of ESG indicators into the variable remuneration systems of senior management and key executives, aligning sustainability objectives with business performance.
Internal control and reporting	• Implementation of the internal control system for sustainability information (SCIIS), strengthening the reliability, traceability and quality of ESG data.
Ethics and compliance	• Strengthening of the Whistleblowing Channel as a mechanism for the prevention, detection and management of potential irregularities.

	• Training provided to the entire workforce on business conduct (Code of Ethics) and the whistleblowing channel.

Table 8: (PILLAR 4) Main milestones achieved in 2025

Evolution of the main indicators

Indicator	2024	2025	Objective
Sustainability Committee at Board level	✓	✓	Mantain
% independent directors	~60%	~64%	≥50%
% women on the Board	30%	36%	Progressive increase
Updated ESG policy framework	—	✓	Keep updated
Reports received (Whistleblowing Channel)	2	4	Consolidate the channel as a key tool for reporting conduct contrary to corporate values
Confirmed cases of corruption	0	0	0

Table 9: (PILLAR 4) Evolution of the main indicators

Looking ahead

This Sustainability Report 2025 reflects an organisation undergoing a profound transformation, aware of the structural challenges facing the steel sector and committed to evolving towards a more efficient, circular, low-carbon and socially responsible industrial model.

In this context, Tubacex has initiated in 2025 a strategic review process, laying the foundations for a new phase of profitable growth, with sustainability as an integral pillar of the Group's transformation. 2026 will mark the beginning of a new strategic cycle aimed at leveraging the results already achieved and defining the next horizon of value creation, deepening its positioning in higher value-added segments, operational excellence, technological modernisation and the integration of ESG commitments as a competitive lever.

With a solid policy framework and a clear focus on delivering results, Tubacex is advancing towards a more efficient, low-carbon and technologically differentiated industrial model, convinced that sustainability constitutes a structural competitive advantage and a core element of long-term value creation.

SECTION I: Sustainability Information (CSRD)

1. General Information

1.1 1.1 Basis for the preparation of the sustainability statement

1.1.1 BP-1 General basis for the preparation of the sustainability statement

(ESRS 2 BP-1: 5 a-5b-5c-5d-5e)

Tubacex, S.A. (hereinafter, "Tubacex" or the "Company") presents its Sustainability Report for the 2025 financial year, prepared in accordance with the guidelines established in Directive (EU) 2022/2464 of the European Parliament and of the Council, of 14 December 2022, on corporate sustainability reporting (hereinafter, CSRD). The provisions of Directive (EU) 2025/794, known as the "Stop-the-Clock" Directive, have also been taken into account.

The application of this regulatory framework has entailed the adoption of the European Sustainability Reporting Standards (ESRS) as the main reference for the preparation of this report. This process has been carried out in accordance with Commission Delegated Regulation (EU) 2023/2772, as well as Delegated Act 4812/2025, known as the "Quick Fix".

Given that the aforementioned European directives have not yet been transposed into the Spanish legal framework, the report additionally includes the disclosures required by Law 11/2018 of 28 December on non-financial information and diversity, which complement and reinforce the information presented in accordance with the European Sustainability Reporting Standards (hereinafter, ESRS), promoting alignment with the objectives of the European Green Deal and contributing to a more sustainable and responsible economy. Likewise, this document also includes the information necessary to comply with the disclosure requirements of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

The information presented covers all companies within the Group's consolidation perimeter. The scope of this report is consistent with that of the published financial statements, with no exceptions or exclusions of any of the Group's subsidiaries.

Furthermore, in preparing this document, only the available qualitative and quantitative information on the value chain has been included, considering the material impacts, risks and opportunities associated both with Tubacex's own operations and with its value chain, covering both direct and indirect business relationships in upstream and downstream stages of that chain.

Tubacex has not considered it necessary to omit information on the grounds of intellectual property, know-how or classified or sensitive information. Nor has any data relating to imminent events or matters under negotiation been excluded, in accordance with the provisions of Articles 19a and 29a of Directive 2013/34/EU.

1.1.1 BP-2 Information relating to specific circumstances

(ESRS 2 BP-2: 9)

The Timeframes used throughout the document have been established in accordance with section 6.4 of ESRS 1, distinguishing between short term (up to 1 year), medium term (between 1 and 5 years) and long term (more than 5 years). In the case of the assessment of climate-related risks and opportunities, the methodology used by Tubacex incorporates specific horizons for both physical risks and transition risks and opportunities, adapted to the nature and temporal impact of each type of risk:

Physical risks	Transition risks and opportunities
• Historical baseline (climate only): 2000–2019 • Short term: 2020–2039 • Medium term: 2040–2059 • Long term: 2060–2099	• Short term: 2024–2030 • Medium term: 2031–2040 • Long term: 2041–2050

Table 10: Timeframes for climate-related risks and opportunities.

1.1.2 Estimation of the value chain

(ESRS 2 BP-2: 10)

In applying the transitional provision and considering the delegated "Quick Fix" act related to the value chain, Tubacex has not included in this report detailed quantitative information on parameters associated with that value chain, due to the difficulty in obtaining such information with the level of reliability and accuracy required for use in the context of this document.

Nevertheless, it has been possible to incorporate information relating to indirect greenhouse gas emissions (Scope 3). The calculation methodology and estimates made are documented in the corresponding section E1-6.

1.1.3 Sources of estimation and uncertainty

(ESRS 2 BP-2: 11a-11b)

With regard to the quantitative parameters and monetary amounts disclosed, the Company reports that all measurements presented in this report are actual results, based on verifiable records. However, there are certain aspects subject to a high degree of uncertainty due to the nature of the assumptions and approximations used in the calculation of certain impacts, which mainly relate to the financial assessment of climate-related risks and opportunities.

Similarly, forward-looking projections — including environmental impacts and Scope 3 emissions estimates — are subject to uncertainty arising from factors such as the variability of emission factors depending on the methodology or source used, and simplified logistical assumptions. All these assumptions are based on technical expertise and available best practices, although the Company acknowledges that such estimates inevitably entail a degree of uncertainty.

The data included in the report that have been calculated on the basis of estimates are as follows:

ESRS	Indicator	Plant	Comments
E1 – Section 2.1.8 Energy consumption and energy mix	Electricity and natural gas consumption	Tubacex Services, S.L.,	Electricity consumption for the months of August to December and natural gas consumption for March, April, September and November have been estimated due to the lack of available readings.
E1 – Section 2.1.8 Energy consumption and energy mix	Electricity consumption	NTS SAUDI	Electricity consumption for the period from August to December has been estimated following the identification of inconsistencies in the readings recorded during those months.

ESRS	Indicator	Plant	Comments
E1 – Section 2.1.9 Gross GHG emissions	GHG emissions Scope 3	All	**Scope 3.4 (upstream transportation and distribution):** the calculation has been estimated on the basis of an analysis of the origin of raw materials, applying a materiality criterion to select the plants with the highest purchasing volume as a reference. Emissions have been estimated according to distances, actual transport modes and the corresponding emission factors, prioritising the most relevant logistics flows. **Scope 3.10 (processing of sold products):** due to the diversity of the steel end-use sectors and the lack of specific emission factors, an internal benchmark has been used. This has been constructed based on the two largest own facilities that use this steel as a raw material, thereby obtaining a representative emission factor. **Scope 3.12 (end-of-life treatment of sold products):** the calculation has been carried out based on assumptions regarding the final destination of products and the scrap generated, defining representative transport routes. Based on these, an average tonne-kilometre factor has been obtained and applied to annual volumes, which have then been converted into emissions using the corresponding emission factors.
E2 – Section 2.2.5 Air, water and soil pollution	Air pollutants	ACERALAVA TTI AMURRIO TTI LLODIO	Mass emission data for atmospheric pollutants have been estimated on the basis of the data corresponding to the most recent closed financial year (2024), as updated data were not available at the time of preparation of this report. The estimation has been carried out based on the variation in production volume between one financial year and the next.
E3 – Section 2.3.5 Water consumption	Water consumption	ACERÍA DE ÁLAVA, S.A.U. TTI - AMURRIO TTI – LLODIO Tubacex Services, S.L.,	The reported water consumption includes estimated consumption for several months at the aforementioned plants, as real data for the 2025 financial year were not available due to errors or technical incidents affecting the measuring equipment. These estimates have been prepared using historical consumption data as a reference, as well as actual consumption recorded in other months of the financial year, in order to ensure the highest possible reliability of the reported information. Details of the estimated data are provided in the corresponding section of the Report.
E5 – Section 2.4.5 Resource inflows	Resource inflows	All	The quantification of resource inputs is carried out on the basis of recorded purchase data. Although this indicator does not directly reflect the physical inputs into the production system, it constitutes a methodologically consistent approach and is considered a representative proxy of the organisation's overall inputs. As the calculation is based exclusively on purchases, overlap between the categories of reused and recycled waste is avoided, thereby mitigating the risk of double counting.

Table 11: Overview of estimation methodologies.

1.1.4 Changes in the preparation of sustainability information

(ESRS 2 BP-2: 13)

The information reported in accordance with the ESRS may be updated in future reporting periods as a result of improvements in internal data collection processes or potential revisions and simplifications of the standards themselves. Accordingly, certain metrics, calculation methodologies or scopes may be modified to ensure alignment with applicable regulations and best practices. Where possible, Tubacex will provide revised comparative information, indicating the differences between the original and updated data, thereby ensuring consistency, traceability and transparency.

This report has incorporated, as changes to its structure, an executive summary of the disclosed information, as well as additional annexes to include more detailed and relevant information in the context of sustainability.

1.1.5 Information on errors from prior periods

(ESRS 2 BP-2: 14, E1-6: 48b-51, E3-4:28 b, E5-4:35. S1-9: 66b. S1-13: 83 b.), OpEx 2024)

Where applicable, any misstatements, restatements or deviations identified in data from prior periods relating to material matters are disclosed in detail, indicating in each case their nature, the correction applied or, where relevant, the justification for the impossibility of correction. Accordingly, the following information is reported in relation to information disclosed in previous years:

- The statement reported in 2024 is corrected from: "Tubacex does not generate Scope 1 GHG emissions arising from regulated emissions trading schemes" to: "Tubacex generates Scope 1 GHG emissions subject to regulated emissions trading schemes. In particular, the Álava steel plant (Aceralava) is included in the European Union Emissions Trading System (EU ETS), as its steelmaking processes meet the criteria for emission-intensive installations regulated under this system."

- Data for the 2024 financial year have been updated by applying the MITERD emission factors for 2024 (version 31, published in 2025), for both Scope 1 and Scope 2. In addition, Scope 3 data for 2024 have been restated in order to:

    - Review and update the units of measurement for materials at the Álava steel plant, adjust conversion factors and incorporate gases into the reporting, with an impact on Scope 3.1
    - To Include Scopes 3.9 and 3.12, which were not included in the original 2024 report.

- The indicator for water consumption in water-stressed areas for the 2024 financial year has been recalculated in order to use the same bibliographic source for determining areas of high water stress in both reporting periods. In 2024, the Climate Scale tool was used, whereas this report applies the WWF Water Risk Filter tool for current, 2030 and 2050 Timeframes.

- The figure for raw materials used is corrected, with the accurate figure being 166,959 tonnes of materials purchased in 2024, replacing the previously reported figure of 166,438 tonnes.

- Data for the 2024 financial year have been restated in terms of Headcount (HC), as they were originally reported in FTE (Full Time Equivalent), in order to ensure comparability with the 2025 financial year, for which indicators are calculated directly on an HC basis.

- Data for the 2024 financial year have been restated in terms of Headcount (HC), as they were originally reported in FTE (Full Time Equivalent), in order to ensure comparability with the 2025 financial year, for which indicators are calculated directly on an HC basis.

1.1.6 Information derived from other legislation or generally accepted sustainability reporting frameworks

(ESRS 2 BP-2: 15)

In addition to the information required by the European Sustainability Reporting Standards (ESRS), the regulatory framework applicable to the disclosure of sustainability information is complemented by various additional legislative provisions. In the case of the Company, the primary reference regulation is Law 11/2018, which governs the preparation of the Non-Financial Information Statement (NFIS) and establishes the minimum mandatory content in relation to non-financial information and diversity.

In this context, the following regulatory provisions are applicable:

- Law 11/2018, of 28 December, amending the Commercial Code, the revised text of the Capital Companies Act approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Audit of Accounts, in relation to non-financial information and diversity. This law constitutes the basic and primary legal framework for the disclosure of the Company's sustainability information. While the CSRD and the ESRS address overlapping thematic areas, certain requirements of Law 11/2018 demand a greater level of detail or specific treatment. The specific required content is set out in Section 2. Requirements of Law 11/2018 – NFIS.

- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (European Taxonomy). This Regulation complements sustainability information through the identification and classification of the Company's economic activities according to their alignment with the environmental objectives of the Taxonomy, including, inter alia, climate change mitigation and adaptation and the sustainable use of water and marine resources.

Furthermore, Table 1 in Annex II of this report includes other references to EU legislation associated with ESRS sustainability disclosure requirements.

1.1.7 Incorporation by reference

(ESRS 2 BP-2: 16)

No information has been incorporated by reference in this report; therefore, no list of disclosure requirements established under the ESRS, nor of the specific data points required that have been incorporated through this method, is included. All information has been presented directly and in full within this document, ensuring its accessibility and traceability.

1.1.8 Use of phase-in provisions in accordance with Appendix C of ESRS 1

(ESRS 2 BP-2: 17)

As Tubacex exceeds the threshold of 750 employees established in Appendix C of ESRS 1, it is required to report information in accordance with ESRS S1, S2, S3 and S4, in line with the results of its materiality assessment.

With regard to sections S2 (Workers in the value chain) and S3 (Affected communities), the Company has applied the proportionality provisions introduced by Delegated Act (EU) 2025/4812, implementing the minimum disclosure requirements in a manner proportionate to the material risks and opportunities identified in these areas. Consequently, the information reported under S2 and S3 focuses on disclosure requirement BP-2, paragraph 17, as set out in Chapters 3.2 Workers in the value chain and 3.3 Affected communities of this report.

1.2 Governance

1.2.1 GOV-1 Role of the administrative, management and supervisory bodies

Governance model and allocation of responsibilities

(ESRS 2 GOV-1: 21a-21b-21c-21d-22a)

Tubacex's governance system establishes a clear allocation of responsibilities between the Board of Directors, its delegated committees and the Management Committee, with the aim of ensuring appropriate oversight of the Group's strategy, risk management and overall performance, including environmental, social and governance aspects.

Board of Directors and Committees. The Board of Directors is the body responsible for the overall supervision of the Company's strategy and management. Its functions include the approval of the main strategic guidelines, oversight of the internal control and risk, impact and opportunity management system, as well as monitoring compliance with regulatory, ethical and sustainability commitments. For the proper performance of its duties, the Board is supported by specialised committees that assist in its supervisory role:

- The Audit and Compliance Committee oversees the integrity of financial and non-financial information, the functioning of the internal control system and the management of risks, impacts and opportunities, as well as compliance with legal and regulatory obligations.

- The Appointments and Remuneration Committee is responsible for proposing and overseeing policies relating to the composition of the Board and Senior Management, as well as remuneration systems, in line with good governance recommendations.

- The Sustainability and Good Governance Committee supports the Board in overseeing strategy and policies relating to sustainability, human rights, good governance and other relevant ESG aspects, ensuring their progressive integration into the Group's management.

The Board is composed of 11 members, characterised by diversity and balance: 7 are independent, 1 executive, 1 proprietary and 2 external. The detailed composition is as follows:

Name	Position	Status	Committees
Manuel Moreu Munaiz	Chairman	Independent	—
Ignacio Mataix Entero	Vice-Chairman	Independent	Appointments and Remuneration / Audit and Compliance Committee
Josu Imaz Murguiondo	Chief Executive Officer	Executive	—
Nuria López de Guereñu Ansola	Board Member	Independent	Audit and Compliance / Sustainability and Good Governance Committee
Isabel López Paños	Board Member	Proprietary	Appointments and Remuneration Committee
Iván Martén Uliarte	Board Member	Independent	Sustainability and Good Governance Committee
José Toribio González	Board Member	Other external	Audit and Compliance Committee
Gracia López Granados	Board Member	Other external	Sustainability and Good Governance Committee

Elena Guede Vázquez	Board Member	Independent	Sustainability and Good Governance Committee
Rafael Martín de Bustamante Vega	Board Member	Independent	Appointments and Remuneration Committee
Xabier Sagredo Ormaza	Board Member	Independent	Audit and Compliance Committee
Maider Cuadra Etxebarrena	Secretary to the Board (non-member)	—	All

Table 12: Composition of the Board of Directors as of 31 December 2025

Management Committee. The Management Committee, led by the Chief Executive Officer, is responsible for the day-to-day management and the implementation of the strategy approved by the Board of Directors. Within this framework, Management integrates ESG aspects into operational decision-making, risk management processes and the execution of corporate policies, periodically reporting to the Board and its committees on the evolution of performance and on the main impacts, risks and opportunities identified.

The current composition of the Management Committee is set out below. It was redefined in 2026 to drive the Group's strategic priorities.

Name	Position
Josu Imaz	Chief Executive Officer
Guillermo Ruiz-Longarte	Corporate Chief Financial Officer
Antón Azlor	Corporate Chief Commercial Officer
Ana López de Mendoza	Chief Risk and Internal Control Officer
Iker Azkargorta	Managing Director of Special Components
Diego Herrero	Corporate Director of Innovation
Manuel Sarabia	Corporate Human Resources Director and Managing Director of Advanced Solutions
Celestino Danis	Managing Director of Steel and Extrusion
Juan Gómez-Cordobés	Managing Director for the Middle East
Ajay Sambrani	Managing Director for Asia
Javier Lorenzo	Managing Director for the Americas
Olalla Montes	Corporate Director of Strategy and Transformation

Table 13: Composition of the Management Committee as of 31 December 2025

Employee representation and social dialogue

(ESRS 2 GOV-1: 21b)

Tubacex prioritises the promotion of an inclusive and participatory working environment, aligned with labour regulations and social dialogue practices applicable in each of the regions in which it operates. Employee representation is considered a key element in ensuring strong labour relations and open, constructive dialogue.

At European sites, and in accordance with applicable labour legislation, formal representation mechanisms are in place to facilitate continuous interaction between management and employees. In the United States, where employee representation is optional in many sectors, Tubacex applies an approach tailored to each site. In Asia and the Middle East, the Group promotes alternative channels for direct communication and internal dialogue, in line with local regulatory and cultural frameworks.

While these mechanisms enable the channelling of workforce participation and concerns, there is currently no direct employee representation within the Group's administrative, management or supervisory bodies.

Composition, diversity and expertise of the Board of Directors

(ESRS 2 GOV-1: 21c-21d-21e)

The Board of Directors of Tubacex is composed of professionals with extensive backgrounds and experience in business areas related to the Group's activities, with particular emphasis on sectors such as engineering, energy and transport (naval, aerospace and automotive). This consolidated expertise enables a thorough understanding of the sectors, products and markets in which the Group operates globally.

From a diversity perspective, the proportion of women on the Board stands at 36% (30% in 2024), and the proportion of independent directors is 64% (60% in 2024), in accordance with the provisions of the Board Regulations. In addition, the current ratio of women on the Board has increased to 0.56, compared to 0.43 in the previous financial year.

Risk management and Policy

(ESRS 2 GOV-1: 22b-22c-22d)

Within the framework of its strategic reflection process, Tubacex periodically updates its corporate risk map with the aim of assessing the risks to which the organisation is exposed, analysing the underlying causal relationships and obtaining an overall view of its risk exposure.

Risk identification is carried out through questionnaires and interviews with those responsible for the various business units and corporate areas, primarily members of the Management Committee. The risks identified are assessed based on their likelihood of occurrence and their impact on strategic objectives, and the projects defined within the strategic plan enable their mitigation and monitoring. This risk management system is aligned with UNE-ISO 31000:2018.

The risk map is presented to the Board of Directors at least twice a year, one of which coincides with the annual review of the Strategic Plan. The Board performs a non-delegable supervisory role over risks, supported by the Audit and Compliance Committee, which in turn is assisted by the Internal Audit and Compliance functions, and in coordination with the Sustainability and Good Governance Committee on ESG-related matters.

Tubacex's General Risk Control and Management Policy, which is approved by the Board of Directors, establishes the principles and criteria governing the Group's comprehensive risk control and management system. This policy is implemented through a structured framework based on a clear definition and allocation of roles and responsibilities, both at operational and supervisory levels, as well as on procedures, methodologies, supporting tools and information systems tailored to the different stages of the risk management process.

The system is structured in accordance with a model in which the various bodies and functions assume clearly differentiated and complementary responsibilities, aimed at ensuring the proper management of the Group's material risks, impacts and opportunities:

- The Audit and Compliance Committee periodically reviews internal control and risk management systems, including tax-related risks, in order to identify, analyse and ensure appropriate reporting of the main risks, impacts and opportunities. With regard to ESG-related risks and impacts, this work is carried out in coordination with the Sustainability and Good Governance Committee, in accordance with the provisions of the Board of Directors Regulations.

- The Internal Audit function informs, advises and reports to the Audit and Compliance Committee on the effectiveness of the internal control system and the management of risks, impacts and opportunities, supporting functional areas in the identification, measurement and control of risks.

- The Management Committee is responsible for carrying out the identification, management and control of risks, impacts and opportunities, integrated into business processes and decision-making, ensuring their proper incorporation into operational monitoring and strategy execution. It is also responsible for promoting a risk management culture within the Company and for establishing and/or delegating action plans to control and reduce exposure to such risks.

Additionally, during the 2023 financial year, the Risk and Control function was formalised at Management Committee level, aimed at strengthening the monitoring and control of the Group's risk profile. Its responsibilities include ensuring that risks are managed within acceptable tolerance levels and guaranteeing appropriate reporting on risk management to the Management Committee, the Audit and Compliance Committee and the Board of Directors.

In terms of sustainability, the oversight of impacts, risks and opportunities is actively carried out through the Sustainability and Good Governance Committee, in coordination with the Audit and Compliance Committee, thereby reinforcing the integration of ESG aspects into the Group's governance system.

Knowledge and competencies of the Board of Directors

(ESRS 2 GOV-1: 23)

The Board of Directors of Tubacex possesses the knowledge and competencies required to oversee the Group's strategy, risks and impacts, including those related to sustainability and ESG factors, in line with the nature of its activities, the markets in which it operates and the complexity of its business environment.

With regard to the maintenance and updating of these competencies, the Board relies on a combination of the professional experience of its members, the periodic information provided by Senior Management and specialised corporate functions, as well as the work of its delegated committees, in particular the Sustainability and Good Governance Committee and the Audit and Compliance Committee. In addition, the Board receives up-to-date information on regulatory trends, emerging risks and relevant sustainability and governance matters through dedicated sessions, supporting documentation and, where necessary, external advice.

The Board also includes members who contribute relevant experience in areas related to sustainability, energy, governance and sustainable development.

Ms Nuria López de Gereñu brings extensive experience in social sustainability and institutional development, promoting projects to improve access to clean energy in communities in sub-Saharan Africa and participating in business and equality forums; she has also held public responsibilities in the fields of the natural environment, infrastructure and transport, which enhances the Board's understanding of the management of environmental and social impacts.

Mr Iván Martén Uliarte has more than 30 years of experience in the energy and environmental sector, having advised governments and regulators on matters related to the energy transition and sustainable development, providing a strategic perspective on regulatory and transition risks.

Ms Elena Guede Vázquez, a Chemical Engineer with a PhD in Chemical and Environmental Engineering, has extensive international executive experience in the industrial sector and in the development of sustainability and decarbonisation strategies, contributing technical expertise to the Board in industrial processes, emissions reduction and the transition towards more sustainable production models.

This diversity of profiles and professional backgrounds contributes to a comprehensive and analytical approach to the identification and oversight of the Group's material impacts, risks and opportunities.

1.2.2 GOV-2 Information provided to the administrative, management and supervisory bodies on sustainability matters and the supervision of the Company and sustainability matters addressed by them

Information flows and frequency

(ESRS 2 GOV-2: 26a)

The Sustainability function reports to the administrative, management and supervisory bodies on the identification and analysis of material impacts, risks and opportunities (IROs) at least once a year, within the framework of materiality assessment and risk management processes. In addition, the corporate risk map, which includes relevant sustainability matters in an integrated manner, is submitted to the Board of Directors twice a year.

Furthermore, the Sustainability and Good Governance Committee receives quarterly information on the progress of the sustainability plan, including the monitoring of the effectiveness of the policies, actions, metrics and targets adopted, as well as the level of progress in the implementation of sustainability due diligence processes (DP 26 a).

Integration of information into strategy and management

(ESRS 2 GOV-2: 26b)

The identified material impacts, risks and opportunities are actively considered by the administrative and management bodies in order to adapt and transform the Company's strategy, business model and processes in response to the needs of the environment and its stakeholders. This approach involves conducting periodic analyses of the operating environment, defining proactive action plans for risk management and identifying growth opportunities aligned with emerging sustainability trends.

In this context, particular note should be made of the creation of a specific area to drive the "Low Carbon" segment, aimed at leveraging business diversification opportunities linked to decarbonisation, while at the same time mitigating risks associated with business models that are more intensive in higher-emission energy sources.

Impacts, risks and opportunities addressed

(ESRS 2 GOV-2: 26c)

The material impacts, risks and opportunities subject to analysis and oversight by the administrative, management and supervisory bodies correspond to those described in section 1.2.2 SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model, where their nature, scope and relationship with the corporate strategy are detailed.

1.2.3 GOV-3 Integration of sustainability-related performance into incentive systems

Incentive systems, scope of application and governance

(ESRS 2 GOV-3: 29ª-29b-29c-29d-29e)

Tubacex has an incentive system that integrates sustainability-related performance into the variable remuneration of Senior Management. In particular, the Company has a Long-Term Incentive Plan 2024–2026 (renewed for 2025–2027), aimed at members of the Management Committee, including the Chief Executive Officer, as well as certain key executives. This plan allows its beneficiaries to receive, after a defined period, an incentive payable in Tubacex shares, conditional upon the achievement of multi-year strategic objectives.

The calculation of the long-term incentive is based on the achievement of objectives focused on the creation of sustainable value for the Company and its shareholders. The structure of the plan allocates the weighting of objectives as follows:

- Shareholder value creation: 50%
- EBITDA (operating profit): 40%
- ESG objectives (environmental, social and governance): 10%

Within the ESG objectives, the following key parameters have been defined:

- Low Carbon product sales: 5%
- Promotion of equality: 5%

Although the Incentive Plan has a three-year duration, its terms and conditions may be adjusted where necessary to preserve the equivalence and purpose of the plan, taking into account significant changes in the Company's internal or external environment. The plan is approved by the General Shareholders' Meeting, in accordance with applicable regulations and good governance practices.

Additionally, Tubacex has implemented a variable remuneration system linked to sustainability objectives that applies to middle management and directors (approximately 300 individuals). Within this group, ESG objectives represent 5% of total annual variable remuneration. For the 2025 financial year, the indicators considered were:

- Scope 1 and 2 emissions: 2.5%
- Accident frequency rate: 2.5%This system complements the Long-Term Incentive Plan and contributes to strengthening the integration of ESG objectives into management and decision-making at different levels of the organisation

1.2.4 GOV-4 Statement on due diligence

(ESRS 2 GOV-4: 30-32)

Tubacex applies a sustainability due diligence approach aligned with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, progressively integrated into its governance system, strategy and business model.

Due diligence is applied both to its own operations and, progressively and on a risk-based approach, to the value chain. It is structured across the different key stages of the process, as described below through cross-references to the sections of the Sustainability Statement where each of these elements is set out in detail.

CORE ELEMENTS OF DUE DILIGENCE	SECTIONS OF THE SUSTAINABILITY STATEMENT
a) Integration of due diligence into governance, strategy and the business model	ESRS 2 GOV-2 ESRS 2 GOV-3 ESRS 2 SBM-3
b) Engagement with affected stakeholders across all key stages of the due diligence process	ESRS 2 GOV-2 ESRS 2 SBM-2 ESRS 2 IRO-1 ESRS 2 MDR-P ESRS S1 S1-2 ESRS S2 S2-2 ESRS S3 S3-2
c) Identification and assessment of adverse impacts	ESRS 2 IRO-1 (including the application requirements related to specific sustainability matters set out in the relevant ESRS) ESRS SBM-3
d) Adoption of measures to address those adverse impacts	ESRS 2 MDR-A ESRS E1 E1-1, E1-2, E1-3 ESRS E2 E2-1, E2-2 ESRS E3 E3-1, E3-2 ESRS E5 E5-1, E5-2 ESRS S1 S1-1, S1-4 ESRS S2 S2-1, S2-4 ESRS S3 S3-1, S3-4
e) Monitoring the effectiveness of these efforts and communication	ESRS 2 MDR-M ESRS MDR-T ESRS E1 E1-4 ESRS E2 E2-3 ESRS E3 E3-3 ESRS E5 E5-3 ESRS S1 S1-5 ESRS S2 S2-5 ESRS S3 S3-5

Table 14: Cross-references to due diligence elements

1.2.5 GOV-5 Risk management and internal controls over sustainability reporting

(ESRS 2 GOV-5: 36a-36b-36c-36d-36e)

General framework of the internal control system for sustainability information (ICS-SI)

(ESRS 2 GOV-5: 36a-36d)

The Tubacex Group has an Internal Control System for Sustainability Information (ICS-SI), designed to ensure the reliability, traceability, consistency and quality of disclosed ESG information, in alignment with the requirements of the CSRD and the European Sustainability Reporting Standards. This system is integrated into the Group's overall internal control framework, together with the corporate risk management system, the compliance system and the Internal Control System for Financial Information.

Responsibilities and governance

(ESRS 2 GOV-5: 36b)

The ICS-SI is structured through a clearly defined governance framework, with responsibilities assigned across the different levels of the organisation. The system is coordinated by the Sustainability function, in collaboration with the Risk and Internal Control, Human Resources, Compliance and Internal Audit functions, and is overseen by Management and the relevant committees of the Board of Directors. In the 2025 financial year, it was integrated into the same IT management tool used for the internal control of financial information.

Identification of sustainability reporting risks

(ESRS 2 GOV-5: 36c)

As part of the design of the SCIIS, Tubacex has defined a specific sustainability information risk matrix, identifying the main risks associated with the ESG reporting process, including, among others, regulatory changes, errors in the presentation of information, failures in the identification of material matters, integrity of input data, fraud, cybersecurity and the uniqueness of reporting. The identification and prioritisation of these risks have been carried out using a risk-based approach, prioritising those with the greatest potential impact on publicly disclosed information and on the Group's financing.

Control activities and methodology applied

(ESRS 2 GOV-5: 36a-36d)

The SCIIS has been developed in accordance with a methodology based on the COSO framework and its five components (control environment, risk assessment, control activities, information and communication, and monitoring). As a result of this work, more than 100 control activities (105 controls) have been defined, covering the different areas of sustainability reporting, including governance, strategy, indicators and operational processes, with the identification of owners, reviewers, evidence and frequency. These control activities are managed through specific digital tools, centralising oversight within the Sustainability team and ensuring the traceability of the data used for reporting.

Oversight, continuous improvement and state of development

(ESRS 2 GOV-5: 36e)

The SCIIS is conceived as a dynamic and evolving system, subject to ongoing oversight and continuous improvement processes. During the 2025 financial year, the focus has been placed on meeting the minimum required standards and establishing a solid foundation for the system, in a context of regulatory developments and ongoing revision of the ESRS standards. Looking ahead to the 2026–2027 period, Tubacex plans to advance in the consolidation and further development of the SCIIS, progressively incorporating improvements and, where appropriate, the support of independent experts, as the applicable regulatory framework becomes clearer.

1.3 Strategy, Business Model and Value Chain

1.3.1 SBM-1 Strategy, business model and value chain

(ESRS 2 SBM-1: 40 a i-40 a ii-40 a iii -40 a iv-40b-40c-40 d i-40e-40f-40g-42a-42b-42c)

Tubacex is a company specialised in the design, manufacture and supply of advanced industrial products and high value-added services for the energy and mobility sectors. Among its key products and services are:

No.	Business Line	Description	Application Sectors
1	**Bars and ingots of stainless steel with high nickel alloy content**	Long stainless steel products, specialising in ingots, bars, rolled and forged products (120–600 mm).	Tubes and bars / Flanges and industrial valves / Hollow bars and other mechanical applications
2	**Seamless stainless steel tubes**	Seamless stainless steel tubes (extrusion, piercing and cold finishing), up to 8".	Oil and gas exploration and production / Offshore / Subsea / Chemical industry / Nuclear energy / Aerospace / Low-carbon solutions
3	**Forged and machined tubular components, fittings and special connections**	Manufacture of special tubular components through forging and machining.	Nuclear energy / Petrochemical industry / Oil and gas exploration and production
4	**High-precision machining**	Complex machining solutions for high-quality alloy components, from well exploration and production to upstream oil and gas operations.	Oil and gas exploration and production / Offshore / Subsea / Drilling tools / Aerospace
5	**Operations and value-added services**	Complementary industrial services: tube threading, welding and bending, tool rental and repair, heat treatments, component machining and coatings.	Tube threading / Welding and bending / Tool rental and repair / Heat treatments / Component machining / Coatings
6	**Stockholding, service and distribution**	Leading distributor of seamless stainless steel tubes.	All industries and the energy sector / Stock management and service centres

Table 15: Sectors of application

In recent financial years, Tubacex has expanded and diversified its product portfolio, incorporating innovative, high value-added technological solutions such as the Sentinel® Prime premium connection, and strengthening its positioning in customised solutions tailored to each client's needs. No products or services have been removed from the global catalogue.

In terms of markets, Tubacex operates on a well-established international basis, with a presence in strategic sectors such as energy, mobility and the aerospace industry. Its global network includes production plants and service centres in Spain, Austria, Italy, the United States, India, Thailand, Saudi Arabia, Dubai, Norway, Canada, Singapore, Guyana, Kazakhstan and Abu Dhabi.

The Group has strengthened its presence in emerging markets, particularly in sectors linked to the energy transition and renewable energy, with no significant market withdrawals recorded within its operating structure. Furthermore, Tubacex products are not prohibited in any market.

The number of employees by geographical area is detailed below:

Number of employees by country	2024	2025
Spain	818.00	813.00
Austria	445.00	424.00
United States	369.00	360.00
United Arab Emirates	256.00	334.00
India	245.00	262.00
Italy	172.00	172.00
Saudi Arabia	189.00	158.00
Thailand	89.00	93.00
Norway	57.00	55.00
Canada	46.00	39.00
Brazil	23.00	24.00
Singapore	19.00	15.00
Guyana	15.00	15.00
France	10.00	8.00
China	6.00	6.00
Netherlands	4.00	4.00
Germany	2.00	2.00
South Korea	1.00	1.00
United Kingdom	-	1.00
TOTAL	**2,766.00**	**2,786.00**

Table 16: Employees by Country

During the 2025 financial year, the Company achieved consolidated sales of €719.2 million, compared to €767.5 million in 2024, reinforcing its position as an international benchmark in the design, manufacture and installation of advanced industrial products.

At present, the Company's main areas of focus are the Energy and Mobility sectors. Its activities range from the exploration and extraction of oil and gas, refining, and various chemical and petrochemical industries to low-emission energy, through the development of innovative solutions for energy generation, storage and transport, with a clear focus on emerging markets such as hydrogen and Carbon Capture and Storage (CCS).

	2024		2025	
End Market	Sales (€ million)	Share of Sales (%)	Sales (€ million)	Share of Sales (%)
Industrial	214.9	28 %	179.800	25%
E&P Gas	199.550	26 %	258.912	36%
E&P Oil	145.825	19 %	122.264	17%
New energy and mobility markets	153.5	20 %	107.880	15%
Powergen	53.725	7 %	50.344	7%

Table 17: Sales by Market

Likewise, its products and services meet the needs of various chemical and petrochemical, aerospace, low-carbon, fertiliser, and electronics and new technologies industries, among other sectors of activity.

Within its sustainability strategy, Tubacex sets an ambitious course towards a sustainable future, establishing key strategic objectives focused on four fundamental pillars: the decarbonisation and circularity of its business; innovation for the energy transition; the care of people and local communities; and a strong culture of transparency and integrity. This commitment to sustainability forms part of the Company's overall strategy and is embedded transversally across all its business areas. At an operational level, it guides the evolution of all products and services offered, promoting the development of stainless steel solutions through more energy- and emissions-efficient processes, applying strategies that minimise environmental impact and actively contribute to the decarbonisation of its clients.

The main pillars and strategic lines are as follows:

Advancing towards neutrality and promoting the circularity of the business	Contributing to the development of innovative solutions for the energy transition	Caring for our people and the surrounding environment	Doing the right thing and fostering transparency
Reducing its environmental footprint, acting as an active agent in decarbonisation, efficiency and circularity.	Participating in innovative initiatives that lead the energy transition and placing our technological capabilities at the service of our clients and business diversification.	Developing a safe, inclusive and equitable environment, contributing to social development wherever we operate.	Promoting a culture of transparency and integrity, based on ethical and compliance principles, incorporating best practices in good governance.
○ Advancing in decarbonisation and energy efficiency. ○ Promoting the circularity of the business. ○ Driving a sustainable supply chain.	○ Participating in leading initiatives for the transition. ○ Facilitating the industrialisation of high-impact innovative technological solutions, advancing business diversification. ○ Collaborating with our clients in the development of innovative solutions that support their transition.	○ Promoting a culture of prevention and well-being. ○ Strengthening the engagement of our people with the corporate project. ○ Fostering an inclusive, diverse and equitable culture. ○ Promoting social development and respect for human rights.	○ Upholding the highest standards of ethics and compliance. ○ Strengthening information governance, ESG management and sustainable finance. ○ Promoting an active risk management culture. ○ Developing an internal and external communication model.

Table 18: Strategic Pillars and Lines

These objectives are deeply embedded within the Company's internal processes, and are reflected in products and services designed to generate a positive and sustainable impact.

In addition to its commitment to sustainability, the Group's strategy is focused on diversification towards new products and sectors. This has enabled Tubacex to expand its offering, strengthening its presence in global markets and in businesses centred on the energy transition.

The Company has evolved towards an integrated services model, covering everything from design to after-sales, offering comprehensive and customised solutions capable of addressing current technological challenges. Furthermore, with the aim of reducing its dependence on traditional energy sources such as oil and gas, Tubacex seeks for this segment to represent less than one third of its total activity.

Another key pillar of its strategic plan is business stability. In order to mitigate market cyclicality, the Company diversifies its product mix with premium solutions, expands its geographical presence and optimises its raw materials and energy hedging strategy. In addition, it has strengthened its competitiveness through rigorous control of operating costs, efficient management of raw materials and scrap, and operational excellence supported by digitalisation.

To ensure the monitoring and fulfilment of these commitments, Tubacex has assessed the alignment of its significant products and services with its sustainability objectives, taking into account its main markets and customer groups. In segments linked to conventional energy, the main challenge identified is supporting clients in their decarbonisation processes through solutions that improve efficiency, safety and emissions reduction in existing infrastructure. Furthermore, the Group operates in segments aligned with the energy transition, offering products and solutions for applications such as hydrogen, carbon capture and storage, nuclear energy and other low-emission industries, which show a high degree of alignment with Tubacex's strategic sustainability objectives.

At the same time, Tubacex continues to advance with its NT2 Strategic Plan (New Tubacex in the Next Transition), which aims to consolidate its position as a supplier of advanced industrial products and high value-added service for the energy and mobility sectors. This plan, based on the previously mentioned pillars of sustainability, profitability and competitiveness, strengthens the Company's commercial position in a market undergoing recovery.

Presented in November 2023, it extends the duration of the original plan until 2027 and marks a new cycle focused on accelerating the energy transition and corporate transformation, aligning with emerging trends in sustainability and innovation.

The NT2 plan is structured around four key areas:

Sustainability and Energy Transition. It prioritises the development of solutions for carbon capture, storage and utilisation (CCS) and hydrogen, promoting a balanced coexistence between conventional and renewable energy.

Financial Objectives. The plan envisages solid growth in both business activity and profitability, while maintaining a balanced and sustainable financial position.

Diversification and Reduction of Dependence on the Oil & Gas Sector. The aim is to reduce exposure to the Oil & Gas sector to less than one third of total activity, while increasing diversification towards strategic sectors such as aerospace and renewable energy.

Competitiveness and Stability. It focuses on improving competitiveness through operational efficiency, debt reduction and the strengthening of long-term relationships with key clients.

This plan reflects Tubacex's firm commitment to sustainable growth, promoting innovation and adapting to global challenges, with a clear forward-looking orientation.

Tubacex sources primarily high-quality metals and minerals, as well as energy and chemical products that are essential for the manufacture of its advanced industrial products. These inputs are procured through a globally selected network of suppliers that meet high standards of quality, traceability and sustainability.

Upstream	Core operations	Downstream
Sypply of critical inputs	**Production and transformation**	**Market, use and circularity**
Metals and minerals (steel, special alloys).	Manufacturing of stainless solutions and advanced alloys.	Suppliers, traders and packagers.
Energy	Value-added industrial operations	Manufacturers of procesing equipment and EPC contractors.
Chemical products	Quality control, industrial stock management and customer service.	End customers in strategic sectors (O&G, nuclear, aerospace, energy).
Stages:		
Extraction	Industrial transformation ✓	Sales and distribution ✓
First distribution and pre-transformation	Manufacturing and quality control ✓	Use of the product
Secondary distribution and procurement ✓	Preparation and expedition ✓	End of life and recycling
✓ Scope of value chain		

Table 19: Value Chain

The Company maintains close relationships with its strategic suppliers to ensure a stable supply of these materials and to guarantee traceability and quality at all stages of the production process. In addition, the Company places significant importance on sustainability within its supply chain, seeking suppliers that are also committed to energy efficiency, emissions reduction and compliance with environmental regulations.

Value for customers lies in the reliability, high strength and superior performance of Tubacex products, which are essential for critical applications where safety, operational integrity and continuity of service are key. Through its technical expertise, advanced engineering capabilities and innovative approach, the Company offers solutions that reduce operational risk, increase lifecycle efficiency, and provide durability and cost optimisation.

Furthermore, Tubacex's commitment to quality, traceability, sustainability and regulatory compliance strengthens customer trust, creating solid, long-term relationships.

For investors, Tubacex offers a robust, diversified and resilient business model, with a strategy focused on sustainable growth and long-term profitability. The Company integrates ESG criteria into its management, thereby reducing operational, regulatory and financial risks and improving its positioning in the context of the energy transition and new market opportunities.

Its focus on innovation, operational efficiency and sustainability enables the generation of stable and attractive value for shareholders, reinforcing competitiveness and future growth potential.

1.3.2 SBM-2 Stakeholder Interests and Views

(ESRS 2 SBM-2: 45 ai-ii-iii-iv-v-45b-45ci-ii-iii-45d)

Tubacex recognises that the Company's long-term success depends on the creation and maintenance of strong, trust-based relationships with its various stakeholders. To this end, the Company has identified five main stakeholder groups that form the core of its relational ecosystem: shareholders and the financial community, employees, customers, suppliers and society.

Based on this primary structure, more than fifty stakeholder sub-groups have been defined, each with specific characteristics, expectations and needs, enabling the organisation to tailor its communication and collaboration strategies in a more precise and effective manner.

To ensure consistent and effective communication, regular interaction channels have been established with each of these groups. These forums enable the Company to maintain an ongoing dialogue, identify expectations and priorities, and design

action plans aligned with the legitimate interests of the parties involved, thereby strengthening transparency and mutual trust.

Categorization of stakeholder groups and information sources

	Shareholders and the financial community Majority and minority shareholders Analysts and investors Funding entitites Regulatory bodies	**Human team** Direct employees Third-party workers Students
	General Shareholders' Meeting Encounters Shareholder channel	Satisfaction EFQM Suggestions Key forums Training
Suppliers and partners Raw material suppliers Technology and sevice suppliers Association and clusters	**Customers** End customers Distributors Engineering firms Equipment manufacturing	**Affected communities** Regulatory bodies NGOs Educational institutions Employement agencies Media
Encounters Presence in forums Partnerships	Satisfaction surveys Commercial indicators Visits Presence in forums Trade fairs Customers' Day Market studies	Key forums Training Encouters Board of trustees Partnerships Key projects

Table 20: Stakeholder Groups

Tubacex integrates the needs and expectations of its stakeholders into its strategic reflection process, which directly involves the Executive Committee and the heads of the different areas of the Group. This approach allows for the continuous adjustment and adaptation of the business model and corporate priorities, reflecting these contributions in the aforementioned strategic plans.

These interactions constitute an essential source of information for identifying the material topics that form the basis of the materiality analysis, described in detail later in this report (IRO-1). During the current financial year, no additional specific measures have been planned to address stakeholder interests or views beyond the established dialogue mechanisms.

The purpose of these relationships goes beyond meeting immediate expectations: it seeks to strengthen the creation of sustainable and shared value, engaging local communities and promoting relationships based on transparency, trust and mutual cooperation.

- **Shareholders and the financial community**. Shareholders support Tubacex's business project and their trust is key. Addressing their interests and building confidence through long-term, stable relationships is Tubacex's priority with this group. Likewise, the finance team maintains ongoing, transparent and stable relationships with other stakeholders such as banks, investors and analysts, who represent access to sources of financing for clients.
- **Customers.** Tubacex's strategy is based on offering comprehensive value propositions tailored to the needs of its customers. Its strategy is defined to understand and be able to supply complete solutions with the highest quality standards. Accordingly, all areas, each from its respective function, are fully customer-oriented.
- **Suppliers.** They are part of Tubacex's business success, which relies on a panel of stable, sustainable and ethical suppliers, whom it evaluates to identify potential risks during procurement processes.
- **Workforce**. This group primarily represents the people who drive the business project across all categories, as well as their representatives, and extends to their families and other groups. They represent a strategic asset, contributing through their work and talent to the creation of sustainable value. Tubacex has a multicultural team of professionals with very diverse backgrounds, but with a common reference point: to grow the Company and meet the needs of our customers, shareholders and society as a whole.
- **Affected communities**. This group includes regulatory bodies, educational institutions and civil society. It is a key stakeholder group in consultation processes, both in the day-to-day operations of the plants and, in particular, in newly developed sites.

1.3.3 SBM-3 Material Impacts, Risks and Opportunities and Their Interaction with the Strategy and Business Model

(ESRS 2 SBM-3: 48a-48b-48ci-ii-iii-iv-48d-48f-48g-48h-22b)

The analysis of material impacts, risks and opportunities has made it possible to identify significant effects, both current and potential, that directly influence the Tubacex Group's business model, value chain, strategy and decision-making processes.

These impacts, which largely stem from the Group's own activities—focused on the design, manufacture and marketing of tubular solutions in stainless steel and high-performance alloys, as well as the provision of associated services for strategic sectors such as energy, mobility and industrial processes—and from its relationship with the value chain, directly affect key areas of operations. This has driven the need to adapt strategies and business models to ensure long-term competitiveness and sustainability. Although these adaptations are in the process of being integrated into the Group's various strategic plans, active efforts are already underway to align them with the identified priorities.

In this regard, the most relevant effects identified are concentrated in key areas such as climate change, occupational health and safety, supply chain management, human rights and corporate governance.

As an industrial company, Tubacex faces the challenge of reducing its environmental impact in order to comply with increasingly stringent regulations, while at the same time safeguarding the health and safety of its workforce, given the exposure to operational risks inherent to its activities, which include melting, rolling, forming and heat treatment processes, as well as the machining and finishing of tubular components.

In addition, responsible supply chain management is a critical aspect. The Company therefore strengthens its controls and assessments to ensure that its suppliers operate in accordance with ethical, social and environmental standards, minimising negative impacts on local communities.

In the field of corporate governance, Tubacex maintains a firm commitment to transparency, business ethics and regulatory compliance, which is presented as an essential pillar for strengthening stakeholder trust and ensuring sustainable development.

In response to these challenges and opportunities, Tubacex has developed a Sustainability Plan that integrates various strategic pillars and specific projects aligned with the commitments set out in different corporate policies. This plan establishes clear objectives, internally defined targets and concrete actions communicated to stakeholders, thereby reinforcing coherence between strategy, management and accountability.

Through this approach, the Company not only seeks to mitigate the risks associated with these material effects, but also to capitalise on opportunities for responsible growth, consolidating its long-term competitiveness and sustainability.

At present, the entity does not carry out an analysis of the resilience of its strategy and business model in relation to its capacity to address material impacts and risks and to take advantage of the identified material opportunities. However, the Company does prepare a corporate risk map, which is updated annually, in which all identified impacts are assessed from a comprehensive perspective, considering both their positive and negative consequences on the environment and on people. In addition, particular attention has been paid to how these impacts affect the health and well-being of communities, as well as ecosystems and natural resources.

In the social sphere, the professional development and motivation of employees represent a key opportunity to strengthen their well-being, satisfaction and commitment to the Company's strategic objectives. Promoting their growth within the organisation not only enhances overall performance, but also reinforces alignment with Tubacex's corporate values, fostering a more productive, inclusive and sustainable working environment.

In the environmental sphere, the depletion of water resources constitutes a material risk for both people and the environment. Water, an essential resource for life and economic activity, faces pressures arising from climate change and increasing industrial demand. Its scarcity may lead to critical consequences, such as reduced access to drinking water, deterioration in water quality, impacts on food security and an increase in social conflicts. For this reason, Tubacex promotes responsible and efficient water management aimed at mitigating risks and preserving environmental and social balance.

Current material impacts are expected to be tangible in the short term, while those with a high probability of occurrence are projected in the medium term. Those with low probability or dependent on external factors are considered over a long-term horizon.

This temporal classification enables the prioritisation of strategic actions and the definition of specific measures to mitigate risks and seize opportunities at the appropriate time, aligning corporate decisions with the Tubacex Group's sustainability objectives.

The vast majority of the IROs identified by Tubacex are aligned with the European Sustainability Reporting Standards (ESRS), demonstrating solid coverage of the key aspects relevant to the Company. The full inventory of these is set out in Annex II of this report.

However, the analysis process has identified two additional subtopics not explicitly covered by the ESRS, but considered critical for the sustainability and future development of the Group:

- Cybersecurity, as an essential element in an increasingly digitalised industrial environment, where information protection and operational continuity are strategic factors.

- R&D&I, as a fundamental pillar for driving technological innovation, the development of sustainable solutions and long-term competitiveness.

Details of the material impacts, risks and opportunities, grouped by ESRS topics and resulting from the Tubacex Group's double materiality assessment process, can be found in Annex I of this report. Tubacex, ensuring the traceability of results in relation to the financial statements, carried out specific calculations during the 2025 financial year on the current and expected significant financial effects arising from material risks and opportunities impacting the Tubacex Group's financial position, financial performance or cash flows, limited to those associated with climate change. It should be noted that no changes have been identified in the material IROs compared to the first materiality assessment carried out in 2024.

Below is a list of the material IROs identified in the Double Materiality Analysis, for which their position in the value chain and their effects on the Company's strategy will be detailed:

Material Topic (ESRS)	IROs	Value chain relationship		Strategic alignment
E1 – Climate Change	(I-) Generation of greenhouse gas (GHG) emissions, both direct and indirect (I+) Reduction in energy and resource consumption through energy efficiency measures (I+) Decrease in GHG emissions, directly or indirectly, through specific reduction measures and mechanisms such as CBAM, EU ETS II or internal carbon pricing (R) Extreme climate events (floods, storms, extreme droughts, etc.) (I+) Contribution to environmental protection through climate change adaptation actions (I-) Impact on human health (harm, injuries and other adverse effects) due to exposure to conditions arising from climate change, such as heat stress or extreme wildfires (I-) Consumption of energy resources and depletion of fossil fuels and other natural resources (I+) Procurement of 100% renewable energy, thereby avoiding the consumption of fossil energy resources (I+) Implementation of renewable energy self-consumption systems (R) Increase in energy costs (R) Volatility of the energy market (R) High dependence on energy generated from fossil fuels	Across the entire value chain	In the analysis of location-based physical risks, it has been considered that suppliers and customers located in the same geographical areas present a comparable exposure to the same climatic and environmental factors, thereby extending the scope of the analysis to such stakeholders. The identification of transition risks has been based on global trends in regulatory matters, energy efficiency and the transformation of production models, whose potential impact extends broadly across the activity and the value chain.	**ESG Plans. Progress towards neutrality and enhance the circularity of the business, and contribute to the development of innovative solutions for the energy transition.** Progressive decarbonisation of operations, commitment to renewable energy, energy efficiency and positioning as a provider of solutions for the energy transition. Participation in innovative initiatives that lead the energy transition.
E2 – Pollution	(I-) Deterioration of air quality with negative effects on human health, ecosystems and other living beings (I+) Reduction of air pollution through the implementation of Best Available Techniques (BAT) (I-) Noise pollution (I-) Deterioration of water quality due to pollutant discharges, with negative effects on human health and aquatic ecosystems	Across the entire value chain	Physical risks associated with emissions, discharges or failures in treatment systems may generate operational and reputational impacts that affect not only own operations, but also relationships with customers, including potential production disruptions, restrictions on the purchase and sale of products, and impacts on market perception.	**ESG Plan. Progress towards neutrality and enhance the circularity of the business** Progressive improvement of operational impact, commitment to less polluting technologies and processes, improvement in resource use efficiency, and solutions aimed at reducing the environmental pollution generated.
E3 – Water and marine resources	(I-) Alteration of soil quality without generating risks to human health or ecosystems (I-) Soil contamination with negative effects on ecosystems, living beings and workers or the local community (O) Improvement of water management, reuse and recycling of water within the process (I-) Depletion of water resources (R) Restrictions on supply and increase in prices (R) Legal disputes over water rights and access to water resources (I-) Alteration of the quality of surface or groundwater due to pollutant discharges (R) Litigation for environmental damage, as well as fines and penalties for non-compliance with regulations	Across the entire value chain	The availability and quality of water resources directly condition the production process and may require operational and technological adaptations. Situations of scarcity or supply restrictions may affect the continuity of operations and the ability to supply products to customers, with potential impacts on the value chain.	**ESG Plan. Progress towards neutrality and enhance the circularity of the business** Progressive optimisation of water use in operations, implementation of systems for the recovery and recirculation of water.
E5 – Resource use and circular economy	(I-) Depletion of material resources (intensive use of natural resources that may lead to their scarcity) (I+) Increase in the use of recycled materials (I+) Impact on the supply chain due to requirements for efficiency and recyclability (I-) Loss of valuable materials due to lack of recycling (I-) Emissions associated with the use of non-circular materials (I-) Energy consumption in inefficient stages of the life cycle (I-) Soil contamination due to poor management of hazardous waste (I-) Land occupation by landfills or other waste facilities (I+) Reduction of landfill disposal and increase in the recycling or recovery of waste	Across the entire value chain	Risks associated with the availability of critical raw materials and waste management may create supply constraints, requiring the identification of alternative raw materials and greater collaboration with suppliers and customers. Likewise, opportunities are identified in supporting customers in their ecological transition processes through more circular and resource-efficient solutions.	**ESG Plan. Progress towards neutrality and enhance the circularity of the business** Progressive transition towards efficient resource use in operations, incorporating circular economy principles through the reduction, reuse and recovery of waste.

Material Topic (ESRS)	IROs	Value chain relationship		Strategic alignment
S1 – Workers in the value chain	(R) Trade union pressure and labour disputes (I+) Economic stability and financial security of workers (I+) Worker satisfaction in relation to their job position (I+) Health and well-being of workers (I-) Accidents, injuries and occupational diseases (I-) Deterioration of physical and mental health (R) Absenteeism (R) Increase in insurance premiums (I-) Economic inequality (I-) Discrimination, exclusion and social inequality on the basis of sex, race or other personal condition (I+) Professional development, motivation and personal fulfilment (I-) Violation of human rights (I+) Impact on education (I+) Impact on people's dignity and well-being (I-) Violation of individual rights (I-) Loss or leakage of personal data and its resulting consequences	Tubacex	This standard applies exclusively to the organisation's own operations; therefore, no direct linkage is established with other stages of the value chain.	**ESG Plan. Care for our people and the surrounding environment.** Develop a safe, inclusive and equitable environment, contributing to social development wherever we operate.
S2 – Workers in the value chain	(I+) Economic stability and financial security of workers (I+) Worker satisfaction in relation to their job position (I+) Health and well-being of workers (work-life balance, flexibility, sense of representation and labour protection, appropriate working environment, etc.) (I-) Accidents, injuries and occupational diseases (I-) Deterioration of physical and mental health (I+) Professional development, motivation and personal fulfilment (I-) Economic inequality (I-) Discrimination, exclusion and social inequality on the basis of sex, race or other personal condition (I-) Existence of cases of violence and harassment (I+) Health and well-being of workers	Across the entire value chain	As this is a standard specifically focused on workers in the supply chain, the identified risks and impacts are directly linked to relationships with suppliers and other upstream stakeholders, with a potential impact on supply continuity and corporate reputation.	**ESG Plan. Care for our people and the surrounding environment.** Increased requirements in human rights and supply chain assessment .
S3 – Affected communities	(R) Risk of loss of investors and shareholders (I-) Impact on people's health and well-being (I-) Injuries and loss of life (I-) Abuse or violations of rights	Across the entire value chain	Aspects related to human rights, health and the well-being of communities may arise throughout the entire value chain, shaping the social licence to operate.	**ESG Plan. Care for our people and the surrounding environment.** Increased requirements in human rights
G1 – Business conduct	(R) Reputational and brand risk, negatively affecting the Entity's public perception (R) Risk of reduced ability to attract investment and obtain financing under favourable conditions (I+) Improved performance in sustainability matters. Contribution to environmental protection, social development and good governance, ethics and integrity (I+) Implementation of good governance practices: policies, training, etc. (I-) Professional or personal retaliation (I+) Contribution to the promotion of sustainable development through supply chain leverage, reducing associated negative environmental and social impacts (I-) Impact on the supply chain, including disruption of the supply chain (I-) Undue persecution, misunderstandings or unfounded suspicions, unjustified investigations, and impact on the individual reputation of innocent persons (I-) Abuse of power	Tubacex	Although these are internal governance aspects, their proper management has a significant impact on business relationships, the trust of customers, suppliers and investors, and access to markets and financing.	**ESG Plan. Do the right thing and promote transparency** Increase in requirements for transparency, compliance and CSRD reporting

Table 21: List of IROs and their linkage to Tubacex's value chain and strategy

I-: Negative impact
I+: Positive impact
R: Risk
O: Opportunity

1.4 *Management of impacts, risks and opportunities*

1.4.1 IRO 1 Description of the process for determining and assessing material impacts, risks and opportunities

(ESRS 2 IRO-1: 53a-53bi-ii-iii-iv-53ci-ii-iii-53d-53e-53f-53g-53h-59-)

During the 2025 financial year, Tubacex carried out the annual update of its double materiality analysis with the aim of identifying the material impacts, risks and opportunities (hereinafter, material IROs) on which to disclose information in this sustainability report.

As in the previous year, the process was carried out in accordance with the internal procedure developed based on the European Sustainability Reporting Standards (ESRS), applied in their full version and without simplifications. This procedure, which is submitted to the Sustainability and Good Governance Committee of the Board of Directors, is reviewed annually and establishes the methodology to be followed for the identification, assessment and validation of material IROs, ensuring the consistent application of the criteria defined by EFRAG in the Implementation Guidance for Materiality Assessment.

The purpose of the update is to verify the validity of the results obtained in the previous year, by assessing the existence of potential changes in the Group's scope, activities or operating context, as well as updating financial thresholds and reviewing the set of previously identified IROs.

To this end, a comprehensive analysis of the organisation's context has been carried out, including an assessment of the sectoral environment, a review of the Group's sustainability commitments and policies, and an updated identification of key stakeholders. Likewise, the entire value chain has been considered, covering from the sourcing of raw materials to the end-use phase of products, in order to provide a comprehensive view of the potential impacts and dependencies of the business.

In this review, the Abu Dhabi plant has been incorporated within the analysed scope, although its inclusion has not resulted in significant changes to the business model or to the material topics identified.

Additionally, the process has involved the participation of independent experts who have reviewed the results, proposing adjustments and additional opportunities. Furthermore, the process has taken into account the results obtained from the climate-related risk and opportunity assessment carried out in accordance with the Task Force on Climate-related Financial Disclosures (TCFD) framework, the EU Green Taxonomy and the scientific frameworks of the Intergovernmental Panel on Climate Change, as well as the analysis of water resources and resource use and circular economy conducted in accordance with the LEAP methodology proposed by the TNFD. These inputs were contrasted with the different areas of Tubacex and validated during the review meetings of the analysis, ensuring their consistency with the Group's context and strategy.

The analysis maintains the double materiality approach defined by the ESRS, which combines two complementary perspectives:

- **Impact materiality.** Impact materiality aims to identify the most significant consequences of TUBACEX's operations on people and the environment. Impacts were identified through an internal analysis based on operational data, incidents, audits and internal consultations, complemented by independent sector references. These impacts were classified as actual or potential and as positive or negative, and their presence across the value chain and in the geographies where the Group operates was analysed. Subsequently, internal representatives and external experts assessed each impact in terms of likelihood and severity, the latter measured through the sub-criteria of scale, scope and irremediability, rated on a scale from 1 to 5. Final materiality was determined by applying a significance threshold based on the combination of likelihood and severity, validated by the relevant management, which enabled the prioritisation of the most relevant impacts for management.
- **Financial materiality.** To determine financial materiality, Tubacex applies a comprehensive process that identifies and assesses sustainability risks and opportunities in accordance with the ESRS, analysing their potential impact on financial performance, cash flow, access to financing and cost of capital across different Timeframes. This analysis is supported by the corporate risk management model and takes into account the nature, likelihood and potential magnitude of the impacts. Sustainability risks, due to their strategic relevance and long-term effects, are assessed specifically and, where significant, are incorporated into the corporate risk map for continuous monitoring. The determination of both the likelihood and the magnitude of potential financial effects has been carried out through estimates supported by the Group's accumulated experience, complemented by a comprehensive analysis of relevant information. This analysis includes the consideration of hypothetical scenarios in which risks and opportunities could materialise, enabling a more precise and substantiated assessment; it is reviewed and updated

annually, ensuring continuous evaluation aligned with the evolution of the operating, regulatory and market context.

Sustainability risks are identified by the operational areas and the Sustainability Department and are presented to the Sustainability and Good Governance Committee, which oversees their proper integration into the Group's Enterprise Risk Management (ERM) model. In turn, the Audit and Compliance Committee oversees the preparation and reliability of ESG information and risks. Both committees report to the Board of Directors, which retains ultimate responsibility for their oversight. This framework ensures periodic monitoring, consistent integration into corporate control systems and effective management of sustainability risks.

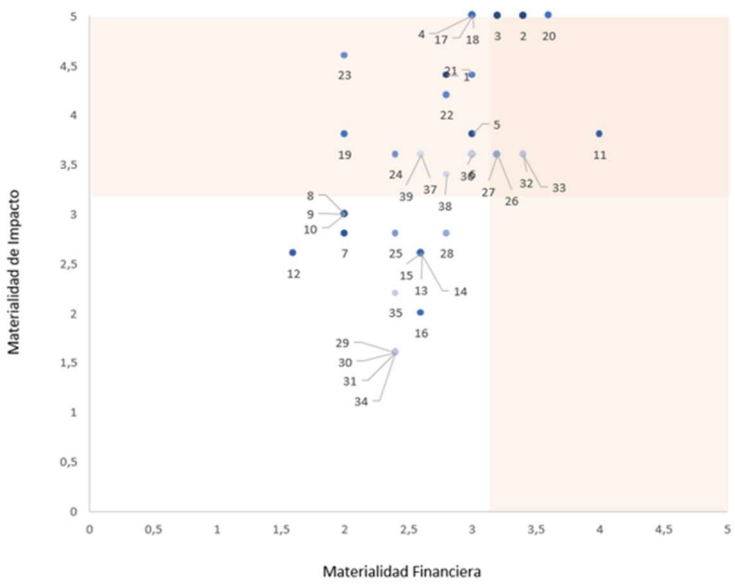
Furthermore, during 2025 the Group has defined a Sustainability Information Supervision and Control System (SCISS) with the aim of ensuring the reliability and quality of sustainability (ESG) information, aligned with the CSRD Directive and the European Sustainability Reporting Standards (ESRS). To this end, it has established a working group comprising the Sustainability, Internal Audit, Risk and Internal Control, Human Resources and Compliance functions to design a process that serves as the basis for establishing controls over key indicators, and which will allow the scope to be expanded in subsequent phases according to the Group's needs. In this initial phase, a matrix with more than 100 control activities has been defined, which will be optimised in later stages.

Double Materiality and Materiality Matrix

The results of the analysis have been reviewed and validated by the heads of the organisation's main areas and subsequently approved by representatives of Tubacex's highest governing body, ensuring their consistency with the corporate strategy and the Group's sustainability commitments.

Additionally, the exercise has been cross-checked with the Finance Department, with the aim of aligning financial materiality criteria with those used in audit and external assurance processes.

The matrix resulting from the combination of the outcomes of both perspectives provides a clearer visualisation of the topics that are prioritised both for the sustainability of Tubacex's business and for the impacts generated on the environment and society.



		SUBTOPICS
E1	1	Adaptation to climate change
E1	2	Climate change mitigation
E1	3	Energy
E2	4	Air pollution
E2	5	Water pollution / Water discharges
E2	6	Soil pollution
E2	7	Contamination of living organisms and food resources
E2	8	Substances of concern
E2	9	Substances of extreme concern
E2	10	Microplastics
E3	11	Water
E3	12	Marine resources
E4	13	Biodiversity loss
E4	14	Species status
E4	15	Extent and condition of ecosystems
E4	16	Ecosystem services and dependencies on these services
E5	17	Resource use
E5	18	Resource output
E5	19	Waste
S1	20	Working conditions
S1	21	Equal treatment and equal opportunities for all
S1	22	Other labour rights
S2	23	Working conditions
S2	24	Equal treatment and equal opportunities for all
S2	25	Other labour rights
S3	26	Economic, social and cultural rights
S3	27	Civil and political rights of groups
S3	28	Rights of indigenous peoples
S4	29	Information-related incidents
S4	30	Personal safety of consumers and end users
S4	31	Social inclusion of customers or end users
G1	32	Corporate culture
G1	33	Whistleblower protection
G1	34	Animal wellbeing
G1	35	Political engagement, political influence, and lobbying activities
G1	36	Supplier relationship management and payment practices
G1	37	Corruption and bribery
ES	38	Cybersecurity
ES	39	Innovation R&D&I

The double materiality analysis has been consolidated as an essential tool for strategic management, as it enables the identification of the most relevant risks and opportunities from an environmental, social and governance perspective, both for the Group and for its stakeholders. This process strengthens Tubacex's ability to anticipate changes in the environment, reinforce its responsible management practices and respond proactively to stakeholder expectations.

The applied model considers that the identification, assessment and monitoring of impacts, risks and opportunities (IROs) are carried out under different frameworks of action, depending on their nature. The results of this exercise are complemented by other internal assessments — environmental, social or governance — ensuring consistency across the various management systems and providing an integrated view of sustainability in corporate decision-making.

In addition, specific social and environmental assessment exercises have been conducted, enabling a deeper analysis of the areas with the greatest impact and the identification of improvement opportunities within the value chain. Risks identified as material are incorporated into the corporate risk map and managed in accordance with the Group's general risk control and management procedure. In this way, the integration of sustainability into planning, control and corporate governance processes is ensured.

The 2025 results confirm the maturity and stability of Tubacex's analysis model, aligned with EFRAG guidelines and with the double materiality approach defined by the ESRS, consolidating its role as a benchmark tool for the Group's strategic management and transparency in reporting.

1.4.2 IRO 2 Disclosure requirements covered under the ESRS addressed in the Company's sustainability statement

(ESRS 2 IRO2: 56-58-59)

As a result of the double materiality assessment of the various sustainability matters, the inventory of disclosure requirements included in this document is set out below, as well as those that have been omitted as they have not been considered material. For further information on the Disclosure Requirement (DR) addressed, the section of the report in which it is located, the associated material IRO or its relationship with the value chain, please refer to Annex 1.2. Disclosure requirements covered under the ESRS, specifically in the following tables:

- Table 1, Annex II: Disclosure requirements and regulatory reference.
- Table 2, Annex II: Detail of material impacts, risks and opportunities, grouped by ESRS topics, resulting from the materiality assessment process.

Environmental	Social	Governance
Climate change Climate change mitigation Climate change adaptation Energy **Pollution** Water, air and soil pollution **Water and marine resources** Water **Circular economy** Resource inflows	**Own workforce** Working conditions Secure employment Working time Adequate wages Social dialogue Freedom of association Collective bargaining Work-life balance Equal treatment and opportunities Gender equality Training and development Employment and inclusion Diversity Other labour rights Child labour Forced labour	**Business conduct** Corporate culture Whistleblower protection Management of relationships with suppliers, including payment practices Corruption and bribery

Environmental	Social	Governance
Resource outflows Waste	Adequate housing Privacy **Value chain workers** (All, except other labour rights (not covered as it is not material)) **Affected communities** (All, except the rights of indigenous peoples (not covered as it is not material))	

Table 22: List of material topics

The various data points (hereinafter "DP" or datapoints) that make up the disclosure requirements will be indicated throughout the text in each section by means of an abbreviated reference in parentheses. This reference will be placed at the beginning or at the end of the paragraph containing the most relevant information, depending on the context in each case. Topics, subtopics or sub-subtopics that are not material are not covered in the content of this report. This conclusion has been reached based on the materiality analysis carried out in accordance with section 1.1.2 IRO-1 of this document, where the criteria and thresholds used to make this determination are set out. Matters that have not been identified as material are those for which no relevant IRO (impact, risk or opportunity) has been identified, either due to their magnitude or severity or due to the likelihood of their occurrence.

1.4.3 MDR-P Policies adopted to manage material sustainability matters

(ESRS 2 MDR-P: 60-61-63-65e-65f)

The results of the double materiality analysis are integrated into the Group's strategic management and are reflected through the corporate policies approved by Tubacex in the environmental, social and governance areas.

The inventory of these policies, together with the identification of the body responsible for their approval, is presented in Annex 3, providing a clear and structured overview of the Group's sustainable management framework.

In line with the results of the analysis, Tubacex maintains an ongoing engagement framework with its stakeholders, enabling their expectations and concerns to be incorporated into the strategic reflection process. These interactions contribute to defining the commitments, objectives and actions that make up the Group's Sustainability Strategic Plan and guide the evolution of its policies.

Furthermore, all corporate policies linked to material matters are available to stakeholders through their publication on the Tubacex corporate website, reinforcing transparency and access to relevant sustainability information.

1.4.4 MDR-A, MDR-M, MDR-T Actions and resources, metrics, and monitoring of the effectiveness of policies and actions in relation to material sustainability matters

(ESRS 2 MDR-A, MDR-M-MDR-T:69b-80g-80i-80h)

Within the framework of its Sustainability Plan, Tubacex has defined 50 key projects aimed at driving the achievement of the objectives set across the four priority areas of action. These initiatives are aligned with the United Nations Sustainable Development Goals (SDGs), as well as with the principles of the United Nations Global Compact, of which Tubacex has been a signatory since 2004. During 2025, these projects have been reviewed, incorporating new initiatives developed by the

different areas of the company. All of them are included in a plan conceived as a living and dynamic document, reflecting the Group's activities in the field of sustainability.

Each project has a designated leader or person responsible for executing the planned actions, whose results are subject to periodic monitoring by the Sustainability Department through the project management office. This unit coordinates and oversees the various initiatives to ensure their proper execution and the achievement of the established targets. Furthermore, these projects are presented as objectives and actions in the corresponding chapters of this sustainability report.

All current financial resource allocations are reflected in the annual accounts, having been duly incorporated into different accounting sections according to their nature. However, it is important to note that the scope presented in this report is more limited, as it does not include the total investments or expenses recorded in the corresponding items of the financial statements.

The main actions, targets and metrics included in the Sustainability Plan are presented in each of the chapters where they are relevant. In addition, neither the targets nor the defined metrics have considered conclusive scientific evidence related to environmental matters, as this has been determined not to be applicable. In defining these targets, actions and metrics, an internal approach has been adopted, taking into account organisational perspectives, without a specific process of direct consultation with stakeholders. With regard to changes in targets, this has been considered not applicable.

The governance of Tubacex's ESG Plan is designed to ensure the strategic integration of sustainability at all levels of the organisation. This approach includes the following key roles:

- **Role of the Sustainability Committee:** Tubacex has established a Sustainability Committee that leads the definition, implementation and monitoring of the sustainability plan. This committee is composed of senior management members, ensuring a direct link between ESG objectives and business operations.
- **Sustainability and Good Governance Committee:** A delegated committee of the Board of Directors that oversees, approves and monitors the ESG Plan.
- **Board of Directors:** The Sustainability Plan was approved by the Board of Directors at the end of 2022.
- **Stakeholder engagement and communication:** The main indicators and targets of the Plan are communicated through the Tubacex corporate website, as well as through the published sustainability reports.

2 Environmental Information

2.1 Climate Change (E1)

2.1.1 Integration of sustainability-related performance into incentive systems (ESRS 2 GOV-3)

(E1 ESRS 2 GOV-3: 13)

Tubacex has a **variable remuneration model aimed at executives and middle management**, which incorporates sustainability indicators. At the beginning of each year, it defines the key performance indicators (KPIs) applicable to the variable incentive plans. The defined indicators are directly linked to performance evaluations. The process combines a top-down approach in the setting of objectives and a bottom-up approach in performance assessment. More than 300 key employees participate in this measurement and monitoring system.

In 2025, this system has incorporated two key indicators linked to ESG objectives, the achievement of which contributes to **5% of the total** variable remuneration. These indicators are:

- Scope 1 and 2 emissions (weighting of 2.5% of total variable remuneration)
- Frequency of occupational accidents (weighting of 2.5% of total variable remuneration)

In addition to this model, Tubacex's Board of Directors approved long-term incentive plans in 2024 and 2025 (2024–2026 and 2025–2027) aimed at the Chief Executive Officer and other members of the company's senior management, which include the granting of Company shares.

This plan allows its beneficiaries to receive an incentive payable in Tubacex shares, provided that certain multi-year strategic objectives are met and that the beneficiary maintains their relationship with the Company. The determination of the long-term incentive will be based on the following objectives, which are primarily associated with shareholder value creation:

- Weighting: 50%; Objective: Total Shareholder Return
- Weighting: 40%; Objective: Group consolidated EBITDA for the 2026 financial year
- Weighting: 10%; ESG Objective: Sales in so-called "Low-carbon" segments (5%), and objectives linked to gender diversity (5%).

2.1.2 Transition plan for climate change mitigation (E1-1)

(E1-1: 14-AR1-16a-16b-16d-16e-16g-16h-16i-16j-29a-29b-29c-29d-29f-34e-34f-AR2)

Tubacex's Climate Change Mitigation Transition Plan aims to significantly reduce the organisation's carbon footprint, aligning with the global targets of the Paris Agreement and contributing to the transition towards a low-carbon economy. The Plan's key objectives have been defined and validated in accordance with the Science Based Targets initiative (SBTi). This validation by the SBTi ensures that emission reduction targets are aligned with scientifically established pathways to limit the increase in global average temperature to 1.5°C above pre-industrial levels. This implies that the Plan's targets are based on recognised climate scenarios, take into account the available global carbon budget, and allocate a fair and proportionate contribution to the entity based on its sector and level of activity.

In this regard, the company maintains a strong commitment to reducing its greenhouse gas emissions across all its activities, with the aim of continuing to progress towards climate neutrality by 2050. At present, it is not included in the EU Paris-Aligned Benchmarks, due to the application of specific eligibility methodologies and criteria defined by these indices, which currently do not include the company within their selection universe. Nevertheless, TUBACEX continues to advance its climate commitments and will periodically review its position as its alignment with European energy transition standards evolves.

Despite this, the company maintains a continuous effort to drive its decarbonisation through its transition plan, which is reviewed annually and approved by the Board of Directors. It is aligned with the company's Strategic Plan, primarily through the Sustainability and Energy Transition pillar, based on three key levers:

- Process efficiency through technological innovations
- Transition towards renewable energy sources
- Promotion of waste circularity

Through these, the following objectives are pursued:

- To measure and promote the gradual and continuous reduction of greenhouse gas emissions (Scope 1 and 2) by 64.32% in absolute terms by 2030, compared to 2019 levels; and by 55.40% for Scope 3 in terms of financial intensity (based on Gross Value Added, GVA). Both targets were validated by the SBTi in April 2024.
- To progress towards the Net-Zero carbon objective by 2050.
- To drive the development of innovative and sustainable solutions across all operations, products and services.
- To optimise resource use, reducing waste and increasing operational efficiency.
- To promote sustainability across the entire value chain, from production to the end-of-life stage of products.

The approval and monitoring of the Transition Plan have involved the implementation of various strategic actions aimed at improving processes and reducing environmental impact, in order to ensure the compatibility of Tubacex's strategy and business model with the transition to a sustainable economy and the limitation of global warming.

The main targets, initiatives and key actions within the framework of this Plan are set out below:

Lever	Target	Objective	Key Actions
Efficiency in Processes Through Technological Innovations	Improve energy efficiency by 25% by 2030 through the adoption of innovative technologies.	Adopt advanced technologies to optimise production processes, reduce resource consumption and minimise GHG emissions. This includes the use of automation, artificial intelligence, big data and intelligent monitoring systems, as well as the development of technologies that enable improvements in energy consumption efficiency, particularly by seeking viable alternatives to natural gas.	Implement energy optimisation technologies in industrial processes. Introduce advanced control systems to monitor and reduce the consumption of water, energy and materials.
Transition towards Renewable Energy Sources	Achieve 40% renewable energy in total energy consumption by 2030, representing 100% of electricity from renewable sources.	Implement an energy transition plan to reduce dependence on fossil energy sources and increase the use of renewable energy across all operations.	Procure renewable energy through Power Purchase Agreements (PPAs) with clean energy suppliers, or through Guarantees of Origin. Explore the implementation of renewable energy in facilities with the highest potential. Explore the installation of solar panels for electricity generation.
Fuel Switching	Replace fossil fuels with lower-footprint alternatives that contribute to the achievement of Scope 1 and 2 SBTi targets.	Explore economically viable alternatives in processes with high gas consumption that are complex to electrify.	Explore alternatives such as biomass, biomethane or hydrogen.
Promotion of Waste Circularity	Increase the percentage of recovered and	Implement a sustainable waste management system for generated waste, promoting	Promote the identification of alternatives to landfill for the main waste streams.

Lever	Target	Objective	Key Actions
	recycled products to 95% by 2030.	recycling and reuse instead of disposal in landfills.	Redesign production processes to minimise waste. Promote services aimed at repair and extending the useful life of products. Increase the recycled content of materials and the percentage of waste recovery.
Value Chain Leverage	Achieve 95% of suppliers assessed on ESG criteria by 2030.	Implement a supplier qualification system that incorporates sustainability criteria into the procurement process, through close collaboration with value chain stakeholders.	Assess suppliers in terms of sustainability and strengthen engagement with their management in social, environmental and governance matters.

Table 23: ESG Plan: Levers, Targets and Objectives

The final outcome of this plan is reflected in the achievement of the emission reduction targets validated by the SBTi, following a pathway that is updated annually as a result of the actions implemented and planned by the production plants. This plan is updated periodically, incorporating the measures implemented and planned by the different plants.

According to the objectives defined above for the three scopes, the steel plant represents the greatest potential for emissions reduction, as it is the facility with the highest gas consumption and where the procurement of materials required for the manufacturing process is concentrated (Scope 3.1, which has the greatest impact within Scope 3 overall).

Year	Scope 1 (Tn CO2 eq)	Scope 2 (Tn CO2 eq)	Scope 1 + 2 (Tn CO2 eq)	% reduction compared to the 2019 base year	Scope 3 (Tn CO2 eq)	Scope 3 (Tn CO2 eq/ gva)	% reduction in intensity compared to the 2019 base year
2019	67,340.00	72,790.00	140,130.0	-	374,195.14	1.86	-
2020	49,123.00	21,390.00	70,513.00	49.68	208,013.63	1.28	31.1
2021	28,084.00	17,526.00	45,610.00	67.45	193,851.12	1.71	8.3
2022	54,813.00	16,361.00	71,175.00	49.21	301,954.44	1.26	32.4
2023	48,612.00	14,506.00	63,118.00	54.96	365,878.00	1.31	29.4
2024	47,870.00	14,572.00	62,442.00	55.40	327,294.00	1.21	34.7
2025	41,371.76	14,020.00	55,391.00	60.50	281,804.00	1.10	40.7

Table 24: Decarbonisation Pathway

The evolution of Scope 1 and 2 greenhouse gas (GHG) emissions shows a structural and sustained reduction compared to the 2019 base year. From the 140,130 tCO_2e recorded in 2019, emissions stand at 55,391 tCO_2e in 2025, representing a 60.5% reduction compared to the base year.

This trend is mainly driven by the implementation of energy efficiency projects, optimisation of industrial processes, progressive electrification and increased use of electricity from renewable sources, in line with the Group's decarbonisation strategy, together with operational adaptation to market conditions.

Within the framework of its decarbonisation strategy, Tubacex analyses not only the current emissions from its operations, but also those which, due to their technological nature (lack of alternative technologies) or structural characteristics (long useful life), cannot be eliminated in the short term. These are known as locked-in emissions and represent a key challenge on the path towards climate neutrality. In the case of Tubacex, the gas furnaces at the steel plant generate significant emissions due to the need to reach very high temperatures in the steel manufacturing process, which prevents their electrification with currently available technology. Although work is ongoing on the transition towards renewable energies, such as hydrogen and biomethane, there are currently no mature technological solutions on the market that allow the complete substitution of gas consumption in these high-temperature processes. This means that emissions from these furnaces will continue to pose a challenge for a certain period of time. These characteristics may condition emission reduction pathways in the short and medium term. In this context, Tubacex adopts a progressive transition approach, aimed at reducing the carbon intensity of existing processes and technologically preparing assets for the future incorporation of low-carbon solutions, avoiding the creation of new locked-in emissions while maintaining industrial viability.

For this reason, this plant incorporates a significant share of the investments made in new technologies (DP 16 e), which will have an impact on the criteria established in Commission Delegated Regulation (EU) 2021/2139, as the steel plant activity is included under Section 3.9 "Manufacture of iron and steel". For further information, please refer to Annex V: EU Taxonomy of environmentally sustainable activities.

2.1.3 Description of the processes for identifying and assessing climate-related material impacts, risks and opportunities (ESRS 2 IRO-1)

(ESRS 2 IRO-1: 18-19a-19b-20a-20b-20c-21-AR9-AR11a-AR11b-AR11c-AR7b-AR69b-AR12a-AR12b-AR12c-AR12d- AR15)

Tubacex has developed a systematic process to identify and assess its material impacts, risks and opportunities (IROs). The specific assessment of climate-related risks and opportunities was carried out during the first half of 2024 and updated in the first half of 2025, applying a comprehensive approach aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), the EU Green Taxonomy and the scientific frameworks of the Intergovernmental Panel on Climate Change (hereinafter, the IPCC).

The identified risks fall into the following categories:

Physicasl risks		Transition risks	Opportunities
Acute physical risks (Short-term extreme events)	Chronic physical risks (Gradual changes)	- Political and legal (current and emerging regulation) - Technological - Market - Reputational	They represent potential benefits.

Table 25: Climate-related Risks and Opportunities

For more detailed information on the identified IROs, please refer to Table 2, "Detail of material impacts, risks and opportunities, grouped by ESRS topics, resulting from the materiality assessment process", in Annex II of this report.

For Tubacex, the main impact associated with climate change arises from its greenhouse gas emissions, making this area a determining factor for both environmental sustainability and the sustainability of the business itself.

For this reason, the Group annually calculates and reports direct and indirect greenhouse gas emissions (Scopes 1, 2 and 3). The emission factors and global warming potential (GWP) values used in the calculation are based on the reference standard of the GHG Protocol, and the atmospheric warming potentials of each GHG and the emission factors are sourced from official databases (the Spanish Office for Climate Change (MITERD), DEFRA, or Ecoinvent).

Tubacex recognises the importance of analysing climate-related risks and opportunities and, therefore, has clear and effective processes in place to manage climate impacts. This management provides opportunities such as strengthening relationships with stakeholders and opening access to sustainable financing, environmental certifications and competitive advantages in more demanding markets, as well as improving process efficiency. Accordingly, Tubacex integrates the results of the analysis of climate-related risks and opportunities into both its strategic and operational decision-making. In addition, it continuously monitors critical risks and defines adaptation and mitigation measures based on KPIs related to identified risks, such as water consumption and CO_2 emissions reduction, among others.

2.1.3.1 Physical Risks

Physical risks related to climate change may have a significant impact on Tubacex's operational continuity and costs. For this reason, the company periodically analyses physical risks at the plants considered material. Below is a description of the process established to identify, assess and manage these risks in its operations, focusing this analysis exclusively on Tubacex's own assets and activities.

Tubacex assesses physical risks arising from climate change by applying the IPCC formula: Risk = Climate hazard × Exposure × Vulnerability

- Climate hazard: Projections of the most adverse scenario (SSP5-8.5) are analysed. Only relevant and applicable hazards are considered:

heat stress, extreme precipitation, wildfires, extreme wind, landslides, subsidence, hail, water scarcity and even tropical cyclones.

- Exposure: This is quantified using objective parameters per facility:
  employment, revenue, production, energy consumption and water consumption.

- Vulnerability: This is determined based on expert judgement, considering the sensitivity of processes, assets and personnel, as well as adaptive capacity according to existing plans and measures.

The combination of these variables allows risks to be classified as: low, medium, high or very high, assessing both inherent risk (without measures) and residual risk (with measures), thereby facilitating the prioritisation of adaptation actions.

Likewise, the level of risk is assessed both as residual (with adaptation measures) and inherent (without adaptation measures), enabling appropriate risk management and the establishment of adaptation measures where necessary to reduce the associated level of risk.

Climate hazards

The identification of climate hazards across different Timeframes is critical for managing risks and ensuring operational sustainability.
In this regard, Tubacex has considered the projected variation (anomaly) of climate hazards across the Timeframes (short, medium and long term) in accordance with the latest available models, analysing both acute and chronic climate hazards across the different Timeframes.
The hazards considered are: heat stress, floods, wildfires, extreme wind, landslides, subsidence, hail, water scarcity and tropical cyclones.

Exposure and sensitivity to physical events and selection of material sites

- In order to identify Tubacex's material sites, both physical locations and specific sites where activities with a significant impact on the organisation's sustainability are carried out have been analysed.
  The analysis has been carried out based on site-specific climate projections for a total of 43 locations with significant operations. As these projections are common to the geographical environment, the identified physical risks equally affect value chain stakeholders that share these locations, both upstream and downstream, with a particular impact on suppliers of critical raw materials located in the same areas. In order to determine materiality, the climate hazards to which they are exposed have been analysed based on their geographical location, incorporating into the analysis criteria related to the level of sensitivity and exposure of each site as follows:

- Exposure: revenue, raw material consumption, production, waste and water.

- Sensitivity: potential impact on processes, assets and infrastructure.

The material sites identified are: Acería de Álava, Tubacex Tubos Inoxidables and Tubacex Assets (Spain), Schoeller Bleckmann Edelstahlrohr (Austria), Tubacex Tubes and Pipes (Umbergaon, India), IBF (Piacenza and Vittuone, Italy), Salem Tube and Tubacex Durant (USA), TBX Upstream (Abu Dhabi).

Two of them account for 80% of the impact analysed.

Timeframes

Tubacex has established different Timeframes for this analysis for physical risks on the one hand, and for transition risks and opportunities on the other.
The Timeframes for physical risks are defined in accordance with IPCC criteria:

- **Historical baseline:** 2000 – 2019
- **Short term:** 2020 – 2039
- **Medium term:** 2040 – 2059
- **Long term:** 2060 – 2099

Climate Scenarios for physical risks

The incorporation of high-emission scenarios in the identification of climate risks is key to preparing for the most critical impacts. The selection of scenarios for the assessment of physical risks arising from climate change has been carried out taking into account the most recent climate projections within the range of scenarios developed by the IPCC. In particular, the Sixth Assessment Report (AR6) on climate change is taken as a reference, which introduces the Shared Socioeconomic Pathways (SSPs), forming the basis of the scenarios used for this analysis.

The different climate scenarios considered are described below:

- SSP2-4.5: The reference (baseline) scenario.
- SSP3-7.0: An intermediate scenario between the baseline and the worst-case scenario.
- SSP5-8.5: A scenario with greater dependence on fossil fuels and, therefore, a higher impact of physical risks.

In line with the precautionary principle, experts recommend using the RCP8.5 trajectory (SSP5–8.5) for the assessment of climate vulnerabilities and risks. Consequently, Tubacex's physical risk analysis has focused on the projections of this scenario, considering the different Timeframes.
This way, Tubacex can make decisions on actions by considering the worst possible scenario (SSP5-8.5) and the evolution of the hazard across the different Timeframes.

2.1.3.2 Transition Risks and Opportunities

The analysis of transition risks and opportunities in operations, as well as the selection of the different scenarios considered for their assessment, has been carried out considering:

- Scenarios from the International Energy Agency (IEA).
- European and national policies (Green Deal, Fit for 55, REPowerEU, EU ETS, NDC, PNACC, PNIEC, etc.).
- Technological and market trends.
- Sectoral information (reports, CDP, decarbonisation strategies).

Given that these scenarios, policies, trends and sectoral information are shared across the value chain, the results can be considered representative of the value chain as a whole.

The assessment of transition risks has been carried out by combining two variables: the likelihood of occurrence of the risk and the impact it could have on Tubacex, using a qualitative scale (DP 20 cii).

The assessment of opportunities is carried out by combining the variables: potential to capture the opportunity and effectiveness of the opportunity.

The impact is classified on a scale of very low, low, medium, high or very high.

Timeframes for transition risks and opportunities

Based on the above information, Timeframes are established, aligning Tubacex's strategy with the main decarbonisation milestones such as the 2030 Agenda, intermediate decarbonisation targets for 2040 and climate neutrality by 2050:

- Short term: 2025 – 2030, aligned with Tubacex's Sustainability Strategy, which includes a catalogue of specific actions in the field of sustainability
- Medium term: 2031 – 2040, aligned with the 2030 Agenda and intermediate decarbonisation targets towards climate neutrality (2030)
- Long term: 2041 – 2050, aligned with the target horizon for achieving climate neutrality by 2050

This analysis enables the preparation of a strategy that minimises risks and leverages opportunities in a changing economic environment, thereby avoiding the lack of identification and planning in the face of these events, which could leave the company exposed to unforeseen costs, loss of competitiveness and regulatory penalties. It also enables rapid adaptation to new regulations or customer demands, while in the medium and long term facilitating the planning of investments in infrastructure and technologies that ensure future viability.

Exposure and Sensitivity to transition events

Tubacex assesses the assets and activities that could be exposed and are sensitive to transition events, enabling it to anticipate and manage the associated risks.

To this end, it considers indicators related to the impact that transition risks may have on the organisation at economic, organisational and reputational levels, identifying the most sensitive and exposed assets and activities depending on the risk assessed:

- Regulatory risks: new regulations and carbon pricing.
- Market risks: changes in demand.
- Technological risks: adoption of low-carbon technologies.
- Reputational risks: stakeholder expectations.

Exposure and sensitivity are determined through a methodology that assesses:

- Likelihood of occurrence, evaluated using a qualitative scale based on regulatory trends, sectoral analysis and internal scenarios.
- Magnitude of impact, estimated considering potential effects on revenue, operating costs, investments, competitive position and reputation.
- Duration of impact, classified as short, medium and long term, according to the Timeframe in which the risks may materialise.

This analysis is essential to ensure that the company can anticipate the challenges posed by the climate transition and design strategies to mitigate them or even capitalise on emerging opportunities. By assessing exposure to

these events, Tubacex is positioned to anticipate regulatory and market trends. This enables the implementation of proactive measures such as diversification towards sustainable products, improving the energy efficiency of its operations, or adopting new technologies ahead of its competitors.

2.1.3.3 Assets and activities that are incompatible or require additional efforts to align with the transition towards a carbon-neutral economy

In the case of Acería de Álava (ACERALAVA), due to its carbon-intensive nature and high dependence on fossil fuels, it will require greater efforts for its decarbonisation, especially in relation to the risk associated with the tightening of the EU Emissions Trading System (EU ETS).

In the short term, ACERALAVA is expected to face increasing costs for the purchase of allowances due to the reduction of free allocations following the entry into force of the CBAM (2026 - 2030).

On the other hand, the IBF Vittuone and IBF Piacenza plants will require additional efforts to reduce their dependence on electricity generated from fossil fuels, such as recent investments in on-site renewable energy generation.

2.1.3.4 Climate scenarios and use of assumptions and hypotheses

Once the projections of the four scenarios described have been analysed, the assessment of physical risks has been carried out based on the worst-case scenario identified, following the recommendations of the precautionary principle mentioned above, SSP5 – 8.5 (scenario with the highest dependence on fossil fuels), while for transition risks and opportunities, the most demanding scenario in terms of regulation, market trends, technological development and consumer preferences has been considered, namely SSP1 – 2.6, the sustainability and climate neutrality scenario.

The alignment of the climate scenarios used with the assumptions reflected in the financial statements is essential to quantify the economic impact of potential climate-related risks and opportunities, thereby facilitating informed decision-making for Tubacex.

In this regard, financial estimates have been carried out for climate-related risks and opportunities with very high criticality in the short term. On this basis, a set of hypotheses and assumptions has been established to quantify the impact of critical risks and opportunities.

2.1.4 Material impacts, risks and opportunities and their interaction with the strategy and business model (ESRS 2 SBM-3)

(ESRS 2 SBM-3: AR6-AR7a-AR7b-AR8a-AR8b-19c-AR19-d)

The main objective of identifying material impacts, risks and opportunities is to ensure the resilience of Tubacex's strategy and business model in the face of challenges associated with climate change.

To this end, the application of the methodology described in the previous section makes it possible, from a financial perspective, to identify risks such as increased insurance costs or the loss of asset value in a scenario of stricter regulation.

Furthermore, this exercise has not only addressed risks, but has also identified significant strategic opportunities, facilitating the prioritisation of investments in resilient infrastructure, the adoption of more sustainable technological innovations and the adjustment of its strategy towards new markets less exposed to climate risks. No material physical or transition risks identified have been excluded from the analysis.

Likewise, the consideration of specific Timeframes during this analysis has been crucial for robust strategic planning. Physical climate risks, such as heatwaves or floods, may generate immediate impacts in the short term, while transition risks, such as regulatory or technological changes, could intensify in the medium term. On the other hand, the long term requires the assessment of scenarios with greater uncertainty, such as the impact of the full decarbonisation of the economy. Failure to consider these horizons in the assessment could result in decisions focused solely on the short term, putting at risk the long-term resilience and sustainability of the organisation.

From an opportunities perspective, resilience analysis across Timeframes makes it possible to identify specific windows for implementing innovations and strengthening competitiveness. In the short term, this may involve adapting to the growing demand for more sustainable products; in the long term, preparing the transition towards a carbon-neutral business model.

Likewise, the analysis carried out based on the different climate scenarios concludes that the greatest transition challenges are expected under the sustainability and climate neutrality scenario, based on compliance with the objectives of the Paris Agreement and the achievement of net zero emissions by 2050. This implies a profound transformation of the production model and will require significant effort in technological adaptation, energy efficiency and innovation.

For all these reasons, having a robust strategy in the face of future climate scenarios strengthens the confidence of investors, customers and other stakeholders, positioning Tubacex as a benchmark company in sustainability and responsible climate risk management.

As a result of this analysis, the following priority impacts, risks and opportunities have been updated and identified, as detailed in the following chapter ESRS 2 - IRO 1:

Physical risks	Impact
Reduction in water availability for industrial processes Risk factor: Water stress and droughts	o Reduction in the production capacity of plants due to lack of water for their processes and/or restrictions on water use applicable to industry. o High investment costs in new water recirculation and saving technologies o Impact on the customer portfolio due to low product availability.
Transition risks	**Impact**

Tightening of carbon pricing mechanisms	**Changes in the Emissions Trading System (EU ETS)** The EU ETS, which already affects one Tubacex site, has undergone modifications since the end of 2023. Between 2024 and 2027, the total number of emission allowances in the EU will decrease by 4.3% annually, and from 2028 onwards the reduction will be 4.4% per year. 2. **Impact on Scope emissions** With Phase IV of the EU ETS (2026–2030), the free allocation will be reduced due to the decline in benchmark values. If Acería de Álava maintains similar emission levels and falls into deficit relative to its allocation, it could face higher production costs. 3. **Introduction of the CBAM and phase-out of free allocation** The gradual elimination of free allocation for sectors included in the CBAM will take place in parallel with its implementation (2026–2034). By 2034, installations in sectors affected by the CBAM will no longer receive free allocations under the EU ETS.
High dependence on electricity generated from fossil fuels	Tubacex began the transition towards renewable electricity supply in 2020, but still faces challenges in certain geographies where plants depend on the national energy mix without the possibility of selecting renewable sources.
Cost pass-through along the value chain due to the introduction of a new emissions trading system (EU ETS II)	The EU ETS II, operational from 2027, will regulate emissions arising from the use of fuels in buildings and road transport. From 2028, suppliers will be required to report the cost of emission allowances passed on to customers, thereby increasing transparency. This system could indirectly increase transport costs for Tubacex's European facilities.
Opportunities	**Impact**
Improvement of waste management	Stainless steel slags, the Group's main non-hazardous waste, contain valuable materials and may generate environmental impacts if not properly managed. Advancing circular economy solutions for their treatment and recovery, as Tubacex has been doing, provides significant economic and environmental benefits.
Energy efficiency of processes	Increasing energy efficiency through more efficient furnaces, automation, energy management and heat recovery reduces emissions and lowers operating costs. It represents an opportunity that Tubacex is leveraging.
Increased transparency of environmental practices and policies resulting from the disclosure obligations of the CSRD Directive	The new environmental disclosure requirements of the CSRD enable Tubacex to enhance its reputation, strengthen trust with stakeholders and demonstrate its commitment to pollution prevention and control.
Leveraging the Energy Savings Certificate System	In Spain, Energy Saving Certificates (CAEs) offer co-financing opportunities for investments in energy efficiency in facilities and fleet, contributing to improving the Group's competitiveness and operational performance.

Table 26: Climate-related risks and opportunities and their associated impacts

Based on the analysis of climate-related impacts, risks and opportunities, Tubacex has identified adaptation and mitigation measures within its strategy and operations. The following highlights some of the most relevant measures implemented or in the process of being implemented:

Measures for efficient water management at the affected facilities (Acería de Álava, TTI Amurrio and TTI Llodio)	Decarbonisation measures implemented mainly at Acería de Álava (ACVA) due to its high impact on the overall corporate footprint	Decarbonisation measures implemented at other Group plants
o Use of closed-loop water systems for certain processes depending on the specific characteristics of each plant. o Recovery and reuse of cooling water. o Improvement in data collection for water consumption analysis (e.g. installation of new meters in pipelines). o Recovery of water from waste: reuse of water from degreasing rinse tanks and acid rinse tanks. Other options such as DAF (Dissolved Air Flotation) are also under evaluation.	o Installation of variable speed drives in the combustion engines of pit furnaces and blooming mills. o Installation of variable speed drives to improve energy efficiency. o Installation of control and automation systems to enhance energy efficiency. o Introduction of a new refining process (ladle furnace). o Installation of a STATCOM system. o Installation of an oxy-combustion system – oxygen lance	o Improvement of the cooling and compression system at the Llodio plant. o Improvement of the hydraulic system of the Llodio extrusion press. o Improvement of the cooling system of the Hipertemple furnace. o More energy-efficient air compressor model. o Heat recovery for integration into the hot water network. o Consumption of alternative fuels. o Replacement of natural gas consumption with biomass, biomethane or electrification of intensive processes. o In 2025, solar panels have been installed at the Italian plant, covering one third of its total electricity consumption. This measure is being evaluated at other Group plants. o For 2025, active PPAs at the Spanish plants have been maintained, which will enable a reduction in exposure to the expected increase in costs under the EU ETS II.

Table 27: Adaptation and mitigation measures for the physical risk: Reduction in water availability for industrial processes

Likewise, Tubacex has also promoted a climate change adaptation strategy that includes business diversification among its strategic pillars, fostering its presence in sectors aligned with the energy transition, while supporting conventional sectors in their decarbonisation processes.

Finally, Tubacex's business model is aligned with public policies and emerging regulations related to climate change. Overall, its climate resilience strategy not only protects its business model against the uncertainties of climate change, but also contributes to its leadership in the transition towards a more sustainable future, adopting a proactive approach to the monitoring and assessment of its climate-related risks and opportunities and adjusting its strategy and business model accordingly.

For more detailed information on impacts, risks and opportunities, their relationship with the value chain and Tubacex's strategy, please refer to Table 14 in section 1.3.3 of this report, as well as Table 2 in Annex II, Detail of material impacts, risks and opportunities.

2.1.5 Policies related to climate change mitigation and adaptation (E1-2)

(ESRS 2-MDR-P: 65a-65b-65c-65d. E1-2:24-25)

In line with the commitments set out in its Sustainability Strategic Plan, Tubacex has two policies that include commitments related to climate change:

- General Sustainability Policy, last review approved by the Tubacex Board of Directors in December 2025.
- Environmental and Climate Action Policy, last review approved by the Board of Directors in December 2025, which specifies the commitments associated with the main environmental challenges and opportunities, including climate action and energy transition.

Both policies are aligned with the 2030 Agenda and the Sustainable Development Goals as a reference framework and apply to all subsidiaries, affiliates, facilities and commercial offices that make up the Group. In addition, there is a commitment to extend their principles to other stakeholders in upstream and downstream stages of the value chain.

Details of these policies can be found on the Tubacex website (General Policies section) or in Annex III of this report.

In this regard, the following commitments associated with the identified material impacts, risks and opportunities (IROs) are established:

Material IRO	Associated specific commitments
• Direct and indirect generation of GHG emissions. • Reduced direct or indirect generation of GHG emissions through the implementation of specific reduction measures and other mechanisms (CBAM, EU ETS II, internal carbon pricing, etc.). • Impact on people's health (damage, injuries and other adverse effects) due to the consequences of climate change, such as heat stress, extreme fire conditions, etc. • Risk of extreme weather events (floods, storms, extreme droughts, etc.), damaging production facilities, disrupting the supply chain or the distribution of products.	• Assess and report physical and transition risks, as well as environmental opportunities, in line with reference frameworks. • Continuously improve energy performance, promoting efficiency, the rational use of energy and technological innovation. • Actively participate in energy transition and industrial decarbonisation initiatives.
• Lower energy and resource consumption. Implementation of energy efficiency measures. • Consumption of energy resources. Depletion of natural resources and other fuels. • Procurement of 100% renewable energy, thereby avoiding the consumption of fossil energy resources. • Risk of increased energy costs, rises in energy prices. This could reduce the company's profitability, especially if measures are not taken to mitigate these costs. • Risk of volatility in the energy market, subject to supply and demand, geopolitics and government changes.	• Continuous improvement of energy performance, prioritising innovation, management and efficient use of energy in all processes, seeking actions that enable process optimisation, equipment renewal and the implementation of advanced technologies. • Incorporate climate resilience and adaptation criteria into processes, facilities and investment decisions.

Material IRO	Associated specific commitments
• Risk of high dependence on electricity generated from fossil fuels, increasing production and/or regulatory costs.	• Promote the use of renewable energy and the decarbonisation of energy sources used in the Group's operations
• Contribution to environmental protection for adaptation to the consequences of climate change	• Collaborate in leading initiatives in the field of the energy transition, actively contributing to the identification of the best alternatives that promote this transition and are applicable to the nature of its activity.

Table 28: Material IROs and associated commitments related to climate change

In conclusion, Tubacex's commitments related to climate change and the energy transition reflect its firm intention to actively contribute to climate change mitigation and to the adaptation of its business model to its consequences.

Through these efforts, Tubacex seeks to align its commitments with the global objectives set out in the Paris Agreement, the Sustainable Development Goals and other international initiatives such as the Task Force on Climate-related Financial Disclosures (TCFD), Carbon Disclosure Project (CDP), Science Based Targets Initiative (SBTi), Taskforce on Nature-related Financial Disclosures (TNFD), United Nations Global Compact (UNGC), integrating climate action as a fundamental pillar of its corporate strategy.

2.1.6 Actions and resources related to climate change policies (E1-3)

(ESRS 2: 68a-68d. E1-3:16 c-16f- AR20-AR21-AR 22)

Tubacex is progressively strengthening its levers for action in response to climate change through a structured approach aimed at reducing greenhouse gas emissions, particularly in those activities with the highest energy intensity and emissions, such as the steel plant. These levers are part of the Group's decarbonisation roadmap and are based on a prioritisation analysis considering impact potential, technical feasibility and alignment with medium- and long-term climate objectives.

In the area of efficiency, flagship projects with the greatest impact at the steel plant stand out, driven within the framework of public support programmes and aimed at improving the energy efficiency of processes through the installation of variable speed drives, heat recovery systems, modernisation of combustion equipment, and the implementation of control and automation solutions in furnaces, compressors, extraction systems and auxiliary service networks. These actions enable optimisation of energy consumption, reduction of emissions intensity and direct action on the Group's main sources of direct emissions.

In parallel, Tubacex promotes levers linked to **the transition towards lower-carbon energy sources**, by increasing the use of electricity from renewable sources, optimising electricity consumption and progressively electrifying certain production stages, with the aim of reducing emissions associated with the energy mix and strengthening the operational management of consumption.

Furthermore, regarding the financial planning associated with these levers, the Group provides information on capital investments (CapEx) linked to the main decarbonisation projects. Information relating to operating expenditure (OpEx) is currently being defined, considering energy price projections by region based on official and benchmark sources, with the aim of ensuring the consistency and robustness of the data to be included in future reporting periods.

Overall, these levers enable Tubacex to make orderly and consistent progress in reducing its climate footprint, focusing efforts on those areas with the greatest contribution to emissions and ensuring the progressive integration of the climate variable into industrial and investment decision-making. This approach lays the foundations for achieving the Group's decarbonisation targets and for alignment with regulatory commitments and applicable sustainability standards.

The actions described contribute to the achievement of the targets and objectives of climate-related policies as follows:

- Actions related to the consumption of low-carbon energy are directly linked to the energy transition commitment set out in the General Sustainability Policy. In addition, they contribute to the commitments of the Integrated Environmental Policy regarding climate neutrality and the promotion of renewable energy.

- Actions focused on improving energy efficiency in production processes and facilities are aligned with the energy transition commitment of the General Sustainability Policy. They also reinforce the commitments of the Integrated Environmental Policy in relation to energy efficiency.

No actions have been implemented to establish corrective measures for individuals affected by material actual impacts.

The ability to execute the defined action plan depends on the availability and appropriate allocation of human, financial, material and technological resources. Their availability and proper allocation constitute an essential condition to ensure that actions are carried out efficiently, enabling the effective achievement of the established objectives within the planned timeframes.

During the 2024 financial year, the economic resources allocated to decarbonisation and energy efficiency projects amounted to 546,916€ in CapEx and €82,600 in OpEx.

In 2025, CapEx amounts to €9,247,410 corresponding to projects implemented or underway, mainly linked to efficiency improvements in the steel plant and the modernisation of equipment and industrial facilities.

Regarding OpEx in 2025, the actions related to this matter are integrated into ordinary operational management, and no specific material items have been identified that would justify their quantitative breakdown. There are differences between the significant operating and capital expenditures disclosed under ESRS E1 and the key performance indicators disclosed under Commission Delegated Regulation (EU) 2021/2178.

2.1.7 Targets related to climate change mitigation and adaptation (E1-4).

(ESRS 2: 68c-75-77a-77b-80a-80b-80c-80d-80e-80f-80j-80i- *E1-4: 16a-24-25-32-33-34b-34c-34d-34e-AR24-AR25a- AR25b-AR26-AR30c)*

As set out in section 2.1.2 Transition plan for climate change mitigation, Tubacex has established ambitious targets to advance decarbonisation and energy efficiency.

Scopes	Reduction targets*	Unit of measurement
Scope 1 +2	64,32%	Ton Co2 equiv
Scope 3	55,40%	Ton Co2 equiv / GVA

Table 1: Reduction targets
*Base year 2019

These targets are science-based and approved by the SBTi, and are therefore aligned with what climate science indicates is necessary to avoid the worst impacts of climate change. They are thus intended to contribute to global efforts to keep the increase in global temperature below 1.5°C or 2°C compared to pre-industrial levels, in accordance with the provisions of the Paris Agreement. The scenario considered in Tubacex's emission reduction targets corresponds to the 1.5°C scenario, the most ambitious one, which reflects the global objective of limiting the increase in temperature compared to pre-industrial levels to 1.5°C. Accordingly, all of the Company's projects are oriented towards achieving this objective, including the ultimate goal of reaching carbon neutrality (Net Zero) by 2050.

The definition of the targets is carried out following a consolidated methodology that is reviewed in accordance with its environmental management system framed under the ISO 14001 standard. This process is based on the assessment of relevant environmental aspects and on the establishment of the Company's strategic objectives, particularly those related to the energy transition and climate change mitigation. Within this framework, targets are developed with short-, medium- and long-term horizons. For long-term objectives, complementary short-term targets are established, enabling continuous monitoring of their performance and ensuring their prioritised attention.

The defined targets are referenced to the base year used, corresponding to the 2019 financial year, as this year represents the last year with normalised results, prior to the COVID-19 pandemic in 2020 and a year 2021 in which the Company faced an exceptional prolonged strike situation that affected its main production sites. Likewise, for the determination of the Scope

2 target, the market-based method has been used. Below are the specific projects developed by Tubacex within this framework:

PILLAR 1: Circularity and neutrality

Action: Improvement of energy efficiency in production processes

Target to be achieved and link to policies: Reduce energy intensity by 25% (MWh/€m GVA). Achieve a ratio of 2.13 MWh/€m GVA (target relative to the base year)

Scope of application: The entire Group, including all plants and geographical areas in which it operates.

Reference value: 2.85 MWh/GVA

Base year: 2019

Timeframe: 2030

Actions / Initiatives	Parameter to be measured and definition	Methodologies and significant assumptions	Validation	Performance against the target
i. **i. ISO 50001**: implementation of energy management systems in accordance with this reference standard **ii. Actions by plant:** **a. Optimisation of production processes** through improved energy efficiency in steel plant equipment and operations. **b. Improvement of the efficiency of equipment** and installations through the modernisation of combustion systems and the incorporation of more efficient technologies. **c. Recovery of residual energy** through the implementation of heat recovery systems in thermal processes. **d. Digitalisation, control and automation** aimed at optimising the operation of furnaces, compressors, extraction systems and other auxiliary services. **e. Optimisation of auxiliary energy services**, such as compressed air networks, pumping systems and cooling circuits.	Energy intensity (MWh/€m GVA)	Total MWh consumed (data obtained from the energy distributor) / millions of euros of Gross Value Added. Limitations to the calculation arising from the estimates made for its determination in accordance with Table 2 of Section 1.1.2.2 of this report.	Validated by supplier	**2024:** Significant progress has been achieved, reaching 1.50 MWh/GVA. **2025:** During this year, the ratio of 1.50 MWh/GVA has been maintained, representing a 47% reduction compared to the reference value, exceeding the initial target. Progress is ahead of what was originally estimated, as the objective has been achieved before the end of its Timeframe.

Action: Green electricity				
Target to be achieved and link to policies: 40% green energy. Green electricity purchase agreements covering the Group's demand (absolute target). **Scope of application:** The entire Group, including all plants and geographical areas in which it operates. **Reference value:** 0% green energy / total MWh consumed. **Base year:** 2019. **Timeframe:** 2030.				
Actions / Initiatives	**Parameter to be measured and definition**	**Methodologies and significant assumptions**	**Validation**	**Performance against the target**
i. <u>Actions by plant:</u> a. Progressive increase in the consumption of **electricity from renewable sources**, through supplies with Guarantees of Origin and equivalent mechanisms. **b. Decarbonisation of the electricity mix**, prioritising lower-carbon intensity sources across the different geographies of the Group. c. **Progressive electrifi**cation of production processes to reduce the use of fossil fuels and associated emissions.	Renewable electricity as a proportion of the total	MWh from green energy (data obtained from the energy distributor) / total MWh consumed (data obtained from the energy distributor) Limitations to the calculation arising from the estimates made for its determination in accordance with Table 2 of Section 1.1.2.2 of this report.	Validated by supplier	**2024:** Progress has been significant, reaching 32.96% of green energy used, indicating consistent progress towards the 40% target. This trend is higher than expected, achieving a level of performance close to the target in 2024. **2025:** During this year, 35.26% green energy has been achieved through Power Purchase Agreements associated with Guarantees of Origin (GoO) certified by the CNMC, as well as through the procurement of electricity from renewable sources at the remaining plants, thereby increasing the total proportion of renewable electricity consumed to the aforementioned percentage.

Table 31: Table 25. Actions and targets in the field of climate change

Targets and parameters are reviewed annually to verify that they remain relevant. In 2025, there have been no significant changes in the company's performance in achieving any target.

As can be observed, these targets are aligned with the commitments set out in the Environmental and Climate Action Policy and the Sustainability Policy, the details of which are provided in Annex III Corporate Policies. (DP MDR-T 80a).

2.1.8 Energy consumption and energy mix (E1-5).

(E1-5: 38a-38b-38c-38d-38e-37a-37b-37ci-ii-iii-39-40-41-42-47-55-AR34-AR38-AR39b-AR46h)

Energy consumption and mix	2024	2025
1)Fuel consumption from coal and coal-derived products (MWh)	0	0
2) Fuel consumption from crude oil and petroleum products (MWh)	1,474	1,509
3) Fuel consumption from natural gas* (MWh)	240,606	218,447
4) Fuel consumption from other fossil sources (MWh)	1,087	1,097
5) Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	27,589	25,563
6) Total fossil energy consumption (MWh)	**270,756**	**246,616**
Proportion of fossil sources in total energy consumption (%)	**67%**	**64.25%**
7) Fuel consumption from nuclear sources (MWh)	**4,113**	**2,077**
Proportion of nuclear sources in total energy consumption (%)	**1%**	**0.54%**
8) Fuel consumption from renewable sources, such as biomass (including also industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (MWh)	0	0
9) Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	128,996	135,123
10) Consumption of self-generated renewable energy not used as fuel (MWh)	0	0
11) Total renewable energy consumption	**128,996**	**135,123**
Proportion of renewable sources in total energy consumption (%)	**32%**	**35.21%**
Total energy consumption* (MWh)	**403,865**	**383,816**
Gross Value Added (€m)	269,641	255,618
Energy intensity (MWh/€m)	**1.50**	**1.50**

Table 32: Energy Consumption and Mix

**During the reporting period, estimates have been made for certain data of the company Tubacex Services, S.L., due to the lack of available readings. Specifically, electricity consumption for the months of August to December and natural gas consumption for March, April, September and November have been estimated.*

Tubacex does not carry out renewable or non-renewable energy generation activities.

On the other hand, Tubacex conducts all its activities within the steel sector, which is recognised as a high climate impact sector and is the only one considered for the calculation of energy intensity. As all its revenues come from this sector, these are the ones taken into account for the determination of energy intensity.

For the calculation of intensities, Gross Value Added (GVA) is used, as it is an indicator that measures the wealth generated by the company through its productive activity and the value added to goods and services acquired from third parties.

GVA is not explicitly stated in the Annual Accounts, but it is directly derived from them and can be reconciled accordingly, in line with the provisions of Article 8.5.b of the Official State Gazette (BOE) of 4 May 2022. The calculation applied includes sales, adjusted for changes in inventories, work carried out for the company and other income, less procurements, consumption and other operating expenses.

This criterion is applied consistently and periodically and is subject to external verification, ensuring the consistency and traceability of the reported information.

2.1.9 Gross Scope 1, 2 and 3 GHG emissions and total GHG emissions (E1-6).

(E1-6: 45d-46g-46h-47-48a-48b-49a-49b-51-53-54-AR39b)

Carbon Footprint	2024	2025
Natural gas consumption [tCO_2e]	43,861	39,855
Own fleet diesel consumption [tCO_2e]	382	384
Process emissions [tCO_2e]	3,627	1,132
Fugitive emissions from refrigerant gases [tCO_2e]	-	-
TOTAL SCOPE 1 [tCO_2e]	**47,870**	**41,371**
Purchased electricity GHG emissions (Market-based)	14,572	14,020
Purchased electricity GHG emissions (Location-based)	38,075	30,267
TOTAL SCOPE 2 Market-based [tCO_2e]	**14,572**	**14,020**
TOTAL SCOPE 2 Location-based [tCO_2e]	**38,075**	**30,267**

Table 33: Tubacex Group Scope 1 and 2 Carbon Footprint

For the selection of emission factors for Scopes 1 and 2, which include stationary and mobile combustion, as well as the use of refrigerant gases, official sources have been used in compliance with current climate change regulations.

In Scope 1, the emission factors published by MITERD for 2024 (version 31, published in 2025) have been applied. In Scope 2, for facilities located in Spain, the official MITERD factors for 2024 (version 31, published in 2025) associated with the electricity supplier Repsol have been used. For plants located outside Spain, emission factors published by the International Energy Agency (IEA) for the national electricity systems of each country have been used at plant level, based on the latest available update (2021 data).

Tubacex generates Scope 1 GHG emissions subject to regulated emissions trading schemes. In particular, the Acería de Álava (Aceralava) is included in the European Union Emissions Trading System (EU ETS), as its steelmaking processes meet the criteria for emission-intensive installations regulated under this system.

As a result, Aceralava must monitor, report and verify its emissions annually in accordance with the applicable regulations, as well as acquire and surrender emission allowances equivalent to its verified emissions. Tubacex complies with all EU ETS obligations and maintains the necessary internal procedures to ensure the control and traceability of regulated emissions.

SCOPE 3 - Other GHG emissions	2024	2025
Scope 3.1	254,794	208,148
Scope 3.2	25,412	23,273
Scope 3.3	27,592	24,972
Scope 3.4*	7,212	6,347
Scope 3.5	92	94
Scope 3.6	490	764
Scope 3.9	3,485	9,956

SCOPE 3 - Other GHG emissions	2024	2025
Scope 3.10**	5,076	4,787
Scope 3.12***	3,141	3,463
TOTAL SCOPE 3 [tCO_2e]	**327,294**	**281,804**
Scope 1 + Scope 2 Market-based + Scope 3 [tCO_2e] (DP 52 b)	389,736	337,195
Gross Value Added [€m] (DP AR 55)	269,642	255,618
ENERGY INTENSITY Market-based [tCO_2e/€m]	**1.44**	**1.32**
Scope 1 + Scope 2 Location-based + Scope 3 [tCO_2e] (DP 52 a)	413,239	353,442
ENERGY INTENSITY Location-based [tCO_2e/€m]	**1.53**	**1.38**

Table 34: Tubacex Group Scope 3 Carbon Footprint

***The calculation of Scope 3.10 (processing of sold products) involves a high level of complexity due to the diversity of sectors to which the marketed steel is destined and the absence of specific and homogeneous emission factors for each of them. Given the lack of detailed information on the production processes of end customers, an approach based on an internal benchmark has been adopted. This benchmark has been constructed based on the two largest in-house facilities that use this steel as a raw material for the manufacture of finished products, allowing for the estimation of a representative emission factor.*

**** The calculation of Scope 3.12 (end-of-life of sold products) has been carried out based on assumptions regarding the final destination of the products and the scrap generated at the end of their useful life. For each representative combination of origin and destination of the scrap, assumptions on transport routes have been defined, including modes and estimated distances. Based on these assumptions, an average transport factor expressed in tonne-kilometres (t·km) has been obtained and applied to the annual volumes of product and scrap. On this basis, and using the corresponding emission factors, the volumes per year have been converted into emissions associated with Scope 3.12.*

****The reduction in Scope 3 emissions in 2025 is mainly due to variations in production activity levels throughout the analysed period.*

Tubacex's plants in Spain consume electricity backed by a Power Purchase Agreement (PPA) and associated with Guarantees of Origin (GoO) certified by the CNMC, which certify that the electricity supplied comes from 100% renewable sources or high-efficiency cogeneration, thereby contributing to the reduction of Scope 2 CO_2 emissions. This supply model directly contributes to the reduction of Scope 2 CO_2 emissions and represents 26.35% of the Group's total energy consumption. Additionally, other plants within the Group procure electricity from renewable sources, increasing the total share of renewable electricity consumed to 35.21%.

In 2024, 10% of Scope 3 emissions, and 11% in 2025, have been calculated using primary data obtained directly from suppliers and other partners in our value chain.

The emissions included in the table correspond solely to the Tubacex Group. The company does not have associates, jointly controlled entities, unconsolidated subsidiaries or joint arrangements over which it does not have operational control. However, it does include in its analysis and emissions calculation other relevant indirect activities, as set out in this section.

Tubacex has maintained the same carbon footprint model during 2025, without excluding or incorporating new categories within the scope, and maintaining the same emission factors associated with purchased goods and services, capital goods, fuel- and energy-related activities, upstream transport and distribution, and waste generated. To ensure consistency and comparability in the calculation of its emissions, Tubacex uses emission factors and global warming potential rates based on recognised official sources. These include:

- The Spanish Office for Climate Change (MITERD).
- DEFRA (Department for Environment, Food & Rural Affairs of the United Kingdom).
- Ecoinvent, a globally recognised database in life cycle assessment (LCA).

Methodological framework and tools used:

Tubacex has selected the GHG Protocol framework as the reference methodology for calculating its emissions due to its robustness and wide international acceptance, as it provides a detailed framework for the quantification and management of GHG emissions, ensuring transparency and comparability of results.

For the calculations, advanced tools have been used, developed with the technical support of specialised technical assistance in this field. These tools incorporate real activity data from all facilities and apply parameterised algorithms to quantify emissions. Additionally, specific spreadsheets and analysis software compatible with GHG Protocol guidelines have been used.

The methodology applied in 2025 follows the corporate model implemented in 2020 for the calculation of emissions across all Group companies, including all three scopes, using real activity data in all cases. In 2025, a review of the model was carried out, incorporating the update of emission factors in Scope 1 and Scope 2, and the inclusion of category 3.12 within Scope 3.

Scope 1 and 2 GHG category	Calculation method
Scope 1: Direct emissions	Electricity, heating, cooling and steam generation: these emissions result from the combustion of fuels in stationary sources such as boilers, furnaces and turbines, and from other combustion processes such as flaring. *Physical or chemical processing: most of these emissions result from the manufacture or processing of ferroalloys in the steel plant.*
Scope 2: Indirect energy emissions	CO2 emissions from the generation of purchased or acquired electricity, heating, cooling and steam consumed.
Scope 3 GHG category	**Calculation method**
1: Purchased goods and services.	Approach based on actual purchase data (weight or volume) and standard factors (Ecoinvent).
2: Capital goods.	Expenditure-based approach.
3: Fuel- and energy-related activities.	Calculated by applying upstream emission factors to the quantities of energy and fuels consumed.
4: Upstream transport and distribution.	Transported volumes and estimated distances were recorded, combined with emission factors specific to each mode of transport (DEFRA).
5: Waste generated in operations.	Tonnes of waste generated by type and disposal method multiplied by emission factors.
6: Business travel.	Calculated by multiplying business travel activity data by the corresponding emission factors for each mode of transport.
7: Employee commuting.	Not considered material for Tubacex.
8: Upstream leased assets.	Not applicable to Tubacex's operations.
9: Downstream transport and distribution.	Transport volumes and distances were recorded, applying emission factors specific to each mode of transport to calculate the emissions generated.
10: Processing of sold products.	Emission factors from the most significant plants were used as a reference.

Scope 1 and 2 GHG category	Calculation method
11: Use of sold products.	Not applicable to Tubacex's operations.
12: End-of-life treatment of sold products.	Key sales markets and reverse supply chains were modelled to reuse products as scrap in the steel plant.
13: Downstream leased assets.	Not applicable to Tubacex's operations.
14: Franchises.	Not applicable to Tubacex's operations.
15: Investments.	Not applicable to Tubacex's operations.
Other (upstream).	Not applicable to Tubacex's operations.

Table 35: Carbon Footprint Calculation Methodologies

For the calculation of GHG intensity based on net revenue, Gross Value Added is used as the denominator. Tubacex uses the Gross Value Added (GVA) indicator as the basis for comparing its different environmental aspects, as it is considered more representative of the economic activity actually generated during the reporting period than mere revenue volume. This approach allows for a more accurate measurement of environmental performance in relation to the company's actual activity. The calculation of GVA is carried out in accordance with the provisions of the Official State Gazette of 4 May 2022, Article 8.5.b.

This indicator therefore reflects the economic value that the company adds to the inputs acquired and constitutes a particularly appropriate metric for normalising environmental indicators (emissions, resource consumption, waste, etc.), by linking them to the actual level of productive activity rather than solely to revenue volume.

Reasons for the methodological choice and benefits:

The selection of the GHG Protocol and official databases is based on the following principles:

- **Relevance**: These tools and methodologies are aligned with international best practices, ensuring that calculations reflect the real impact of the Group's activities.
- **Accuracy:** The use of real activity data and official databases enables a more precise assessment of emissions.
- **Transparency**: It facilitates the traceability and validation of data, providing confidence to stakeholders.
-

2.1.10 GHG removals and GHG mitigation projects financed through carbon credits (E1-7).

(E1-7: 56-58-59-60-61-AR60-AR61-AR62-AR 64-60-61)

To date, Tubacex has not developed greenhouse gas (GHG) mitigation projects financed through carbon credits, as these initiatives have not been a priority in the initial phases of its sustainability strategy. The current ESG plan has been primarily focused on maximising the reduction of Scope 1 and 2 GHG emissions, prioritising actions that directly reduce the company's operational carbon footprint.

However, Tubacex recognises the importance of addressing, in the future, projects aimed at offsetting residual emissions in order to minimise its impact and progress towards net zero emissions by 2050.

2.1.11 Internal carbon pricing system (E1-8).

(E1-8: 62-63a-63b-63c-63d-57a-56-57b-AR65-AR66)

Tubacex has a mechanism for establishing an internal carbon price based on an internal rate (shadow price), which allows the impact of carbon to be integrated into its strategic and operational decision-making processes. The main objectives of this mechanism are:

- Carry out cost-benefit analyses: Incorporating the carbon price allows for a more accurate assessment of the profitability of projects and investments, considering their environmental implications.

- Promote energy efficiency: By assigning a cost to carbon, the adoption of technologies and practices that reduce energy consumption and associated emissions is encouraged.

- Encourage the consideration of climate risks: This approach promotes the integration of climate-related issues into corporate risk assessment processes.

- Influence strategy and financial planning: The incorporation of an internal carbon price enables strategic and financial decisions to be better aligned with the company's sustainability objectives.

- Reduce emissions in the upstream value chain: Through this mechanism, Tubacex incentivises sustainable practices among its suppliers, reducing emissions associated with upstream supply chain activities.

Scope of application and scopes covered
The internal carbon price is used as a key tool in the following processes:

- **Capital expenditure**: Incorporating the cost of carbon into the evaluation of investment projects allows those that are more sustainable and have a lower environmental impact to be prioritised. The use of the internal carbon price is mandatory in certain business decision-making processes, particularly in the allocation of capital expenditure (CapEx). This ensures that investments are aligned with the company's sustainability and emissions reduction objectives.

- **Risk management:** Including the carbon price in risk management helps to identify and mitigate potential exposures related to regulatory changes or climate risks.

This mechanism is primarily focused on the Spanish market, particularly on steel plant activities, as it is a specifically regulated environment. However, its scope extends across the entire Group through corporate investment approval processes, ensuring a consistent application of the defined criteria. It also covers a wide range of emissions, including:

- **Scope 1**: Direct emissions from sources controlled by the company.

- **Scope 2:** Indirect emissions related to the generation of electricity purchased by the company.

- **Scope 3:** Specific and more significant categories, such as:
    - **Category 1:** Purchased goods and services.
    - **Category 3:** Fuel- and energy-related activities.

Factors considered in determining the price

The internal carbon price has been established in alignment with the price of emission allowances set under an Emissions Trading Scheme (EU ETS). This approach ensures that the price reflects the real costs associated with carbon emissions in the regulated market.

The price has been calculated based on the average value of ETS emission allowances from the previous year and price trends 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.

In addition to the regulated market, which currently affects only the Acería de Álava, Tubacex considers it necessary to assess the alternatives offered by the voluntary market, with the aim of incorporating it into the Group's Net Zero strategy.

At present, the company does not carry out offsetting actions (neither through the direct purchase of carbon credits nor through the promotion of projects that generate carbon credits), but it assesses credit purchase prices in both national and international markets in order to incorporate this analysis into its medium- or long-term decarbonisation strategy.

Price ranges used

The price range used varies between a minimum internal price of €65 per metric tonne of CO_2e and a maximum price of €135 per metric tonne of CO_2e. In the case of the regulated market, the price may vary between €5–50 depending on the country or the nature of the project. These values make it possible to reflect both the base cost and potential scenarios of higher regulatory pressure or climate impact. Various emission allowance trading markets have been used as sources for their determination.

Emissions coverage

This mechanism would cover approximately 90% of the total emissions reported during the year across the aforementioned scopes. However, as noted above, its application in the Spanish market — and more specifically in the steel plant — allows for a more precise identification and management of impacts in regulated environments.

Scopes	Emissions (tCO_2e) Total Group	Emissions (tCO_2e) Acería de Álava	% represented by Acería de Álava emissions relative to the total Group emissions
Scope 1	41,371	22,741	55.0
Scope 2. Market Based	14,020	0	0.0
Scope 3.1	208,148	91,155	43.8
Scope 3.3	24,972	8,569	34.3
TOTAL	**288,511**	**123,597**	**52.1**

Table 36: Acería de Álava emissions compared to the total Group emissions

Monitoring and evaluation

The internal pricing approach is monitored and evaluated annually to ensure that it meets its objectives. At the end of each year, a comprehensive review is carried out on the impact of the carbon price on decision-making related to CapEx.

This analysis makes it possible to:

- Verify whether the carbon price has influenced the prioritisation of more sustainable investments.
- Adjust the system or internal price values, where necessary, to maximise its effectiveness in future periods.

This continuous monitoring process ensures that the mechanism remains an effective tool for advancing Tubacex's strategic objectives in terms of sustainability and emissions reduction.

2.1.12 Anticipated financial effects of material physical and transition risks and potential climate-related opportunities (E1-9).

In compliance with the transitional provisions set out in requirement 10.4 of ESRS 1 and Appendix C, as well as the delegated act known as the "Quick Fix", Tubacex avails itself of the option to omit the information required in this section.

Nevertheless, the following information is provided on a voluntary basis in order to offer additional insight into the anticipated financial effects of climate change on Tubacex and thus enhance transparency for stakeholders.

Given its capacity for adaptation, Tubacex's plants are not located in geographical areas exposed to significant physical risks arising from extreme climate events or environmental changes in the short, medium or long term, with the exception of extreme droughts. These represent a physical risk of greater criticality, namely the reduction in water availability for industrial processes at the Aceralava, TTI Amurrio and TTI Llodio facilities, as a result of the associated water stress.

This impact translates into an estimated economic loss of approximately €3.2 million for one-month restrictions and €9.7 million for three-month restrictions.

The assets exposed to this risk represent 6.9% of the Group's total assets. These exposed assets are being addressed through the implementation of adaptation measures related to water efficiency and sustainable resource management strategies aimed at increasing operational resilience in the face of prolonged drought scenarios.

For the estimation of financial effects, assumptions are used to calculate the potential financial impact in the event that climate events materialise, such as water stress and drought.

Tubacex's methodology for both physical and transition risks considers two stages of risk: inherent risk, without considering mitigation and adaptation measures, and residual risk, after identifying mitigation and adaptation measures. Based on this, an estimation of critical risks has been carried out without considering mitigation and adaptation measures.

Regarding the financial effects of transition risks, three critical risks have been identified considering the most adverse sustainability and climate neutrality scenario and the short-term Timeframe (up to 2030), and have been assessed considering the information from the Group's financial statements:

Physical risks	Impact
Reduction in water availability for industrial processes Risk factor: Water stress and droughts	The calculation of the estimated financial effect is carried out under a hypothetical scenario of a 10% restriction in water consumption flow during the summer months (3 months). This would result in a proportional loss of production, as operations would be required to reduce their output, and therefore their revenues would be affected during the period of water consumption restrictions. *The range of the estimated impact varies between €3.2 million and €9.7 million.* *Net revenue from business activities exposed to material physical risk amounts to €563,411.*
Transition risks	**Impact**
Tightening of carbon pricing mechanisms	For the estimation of the expected short-term impact (up to 2030), it is assumed that there will be a deficit balance in ACVA Scope 1 emissions compared to the minimum preliminary free allocations expected for that period. ACVA emissions were projected for the period (2026 - 2030), along with preliminary free allocations, taking into account CBAM reduction factors. The average EUA price for the different years is considered, based on expert forecasts. *Therefore, the annual economic impact would range from approximately €431,000 (in the best-case year) to €1.9 million (in the worst-case year).*

	It should be noted that this cost estimate does not consider any potential surplus held in reserve for the year. Additionally, both ACERALAVA's annual emissions and EUA prices may fluctuate due to technological or market factors, and therefore this estimate should be updated periodically.
High dependence on electricity generated from fossil fuels	From 2027 onwards, Tubacex facilities without a 100% renewable electricity supply could face an increase in electricity costs due to EU ETS 2. As fossil fuel suppliers will be required to pay for their emissions, part of this cost is likely to be passed on to consumers. *Although there is uncertainty regarding the magnitude of the impact, under the assumption that only 50% of electricity will be renewable between 2027 and 2030, two potential increases are estimated: €57,000 in a rapid electrification scenario (EUA2 ≈ €50), and €114,000 in a slow electrification scenario (EUA2 ≈ €100), accumulated for the period 2027–2030.*
Cost pass-through along the value chain due to the introduction of a new emissions trading scheme (EU ETS II)	The entry into force of EU ETS II in 2027 could increase the cost of diesel used by Tubacex Logistics, as suppliers are expected to fully pass on the cost of emission allowances. *Under two EUA2 price scenarios — €50 in the case of rapid electrification and €100 in the case of slower electrification — the estimated increase would be €0.12/l and €0.25/l, respectively. Applying these increases to the projected fuel consumption, the cumulative impact for 2027–2030 would amount to €145,000 in the rapid electrification scenario and €303,000 in the slow electrification scenario.*

Table 37: Financial Effects Associated with Climate-related Risks

The percentage of exposed assets has been calculated based on the total number of sites assessed (43) and the assets with high-criticality risks related to reduced water availability for industrial processes, tightening of carbon pricing mechanisms and high dependence on electricity generated from fossil fuels. The ACERALAVA (Acería de Álava), IBF Vittuone and IBF Piacenza facilities have been identified, representing 7% of the sites (assets).

Although only 7% of Tubacex's active sites are exposed to very high-criticality transition risks, 100% of the active sites assessed have different adaptation measures in place related to the implementation of low-carbon technologies, improvements in energy efficiency, transition towards renewable energy sources and the redesign of operational processes to reduce dependence on fossil fuels.

Regarding Opportunities, the methodology for calculating the financial impact is detailed below:

Opportunities	Impact
Improvement of waste management	Tubacex has analysed the costs associated with the management of its main non-hazardous waste, stainless steel slag, whose treatment and recovery is carried out at a specialised European facility. *The existence of viable alternatives in Spanish plants would generate estimated savings of €660,000–700,000 in the short term.*

Opportunities	Impact
Energy efficiency of processes	To estimate the financial impact of energy efficiency improvements, the reduction in OpEx resulting from initiatives already implemented and planned in Tubacex plants was analysed, such as digital energy control systems and more efficient technologies. *In the reference year, these measures generated savings of €41,000.* *In addition, a further reduction in operating costs is expected for short-term projects, with an estimated savings potential between €1.3 million and €9 million.*
Increased transparency of environmental practices and policies arising from the disclosure obligations of the CSRD Directive	Various studies show that greater ESG transparency and disclosure can improve corporate reputation and, consequently, financial performance. To estimate this effect at Tubacex, a conservative 3% increase in business volume was projected based on 2024 revenues, also applying an uncertainty margin of ±10%. *Under these assumptions, the estimated financial impact ranges between €20.7 million and €25.3 million.*
Leveraging the Energy Savings Certificate System	To estimate the financial impact of this opportunity, Tubacex has considered the energy savings achieved through measures already implemented and eligible to generate Energy Savings Certificates (ESCs). On this basis, the potential revenue from both certificates already obtained and those that could be generated in the short term was calculated, using a range of market prices. *The sum of both constitutes the total projected revenue, while the cost associated with this opportunity is estimated at €11.4 million.*

Table 38: Financial Effects Associated with Climate-related Opportunities

Stranded assets

Tubacex is fully aware of the importance of calculating and disclosing the value of potentially stranded assets in order to effectively manage the financial and strategic risks associated with the transition to a low-carbon economy.

In the risk and opportunity analysis carried out, no assets have been identified that could become stranded. However, the need has been identified to implement modifications and modernisation in certain equipment and machinery to prevent them from becoming obsolete and stranded, optimising their efficiency through the application of the following measures:

- Installation of variable drives in combustion motors of PIT furnaces
- Installation of pressure control system in the hypertreatment furnace
- Heat recovery system (PIT furnaces)
- Flue gas analysers
- Oxygen lance

- Replacement of furnace recuperator

2.1.13 Article 8 of the European Union Taxonomy

ESRS 2 SBM-1: 40 D I. E1-1: 16ci

This section aims to comply with the disclosure requirements set out in Article 8 of Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment. This Regulation has been developed and supplemented by the following Delegated Regulations:

- **Delegated Regulation (EU) 2021/2139,** which defines eligible economic activities in relation to the objectives of climate change mitigation and adaptation; and Delegated Regulation (EU) 2023/2485, which introduces amendments to certain technical criteria and expands the list of economic activities.
- **Delegated Regulation (EU) 2021/2178,** which establishes the methodology applicable to the information to be reported.
- **Delegated Regulation (EU) 2022/1214**, which amends aspects relating to certain activities in the energy sector.
- **Delegated Regulation (EU) 2023/2486**, which supplements Regulation (EU) 2020/852 by defining the technical screening criteria applicable to the objectives of sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and the protection and restoration of biodiversity and ecosystems, as well as by amending Delegated Regulation (EU) 2021/2178 to extend the disclosure requirements for financial and non-financial undertakings.
- **Delegated Regulation (EU) 2026/73**, amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of the information to be disclosed on environmentally sustainable activities, and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards the simplification of certain technical screening criteria to determine whether economic activities do not cause significant harm to environmental objectives.

Delegated Regulation (EU) 2026/73 introduces amendments to the content and format of the information to be reported under the Taxonomy, which may be applied on a voluntary basis in the 2025 reporting period. For this first year of voluntary application, Tubacex has decided to maintain the methodological criteria and formats used in previous years, applying the delegated acts in force as at 31 December 2025, in order to ensure the consistency, comparability and continuity of the information disclosed.

To comply with these requirements, the Group reports on the degree of eligibility of its economic activities in accordance with the environmental objectives defined in the EU Taxonomy, through three economic indicators expressed as a percentage of turnover, capital expenditure (CapEx) and operating expenditure (OpEx).

Following the analysis of Delegated Regulation (EU) 2021/2139, the criterion adopted in 2022 for the assessment of eligibility is maintained, considering activity 3.9 “Manufacture of iron and steel”, carried out at ACERÁLAVA, included in Annex I as a transitional activity in accordance with Article 10(2) of Regulation (EU) 2020/852.

	2024	2025
SALES	84,451	59,055
CapEx	2,790	6,544
OpEx	12,587	9,452

Table 29: Financial resources of eligible activities

**In thousands of euros*

The OpEx figure includes the following items from the annual accounts:

- Environmental management expenses
- Repair and maintenance expenses
- Research and development expenses
- Lease and royalty expenses

The increase in eligible CapEx in 2025 is mainly due to a change in the Group's investment profile. During the financial year, investments were more strongly directed towards actions aimed at improving energy and technological efficiency in facilities included within the scope of the Taxonomy analysis. By contrast, in 2024 investments were largely concentrated on the development of the new plant in Abu Dhabi, with a lower impact in terms of eligibility under the criteria of the European Taxonomy.

With regard to eligible OpEx, in 2024 significant maintenance actions were carried out in the steel plant, which increased repair and maintenance expenses associated with an eligible activity and raised the corresponding percentage for that year. In 2025, although the total expenditure considered in the analysis was higher (€30 million compared to €22 million in 2024), the volume of repairs in the steel plant was lower, as part of the improvement actions linked to the PERTE for decarbonisation were recorded as investments (CapEx), thereby reducing the relative weight of eligible OpEx.

The methodological detail of the analysis carried out and of the application of the technical criteria is set out in Annex V, which forms an integral part of this information.

2.2 Pollution (E2)

2.2.1 Description of the processes for identifying and assessing material pollution-related impacts, risks and opportunities (ESRS 2 IRO-1).

(ESRS 2 IRO-1: 11a-11b-AR9)

Within the framework of the European Sustainability Reporting Standards relating to Pollution (ESRS E2), Tubacex has defined a systematic process to identify and assess impacts, risks and opportunities (IROs) associated with pollution in its operations. In accordance with AR 7, pollution-related physical risks are understood as those that may generate—or have already generated—adverse effects on the environment or human health.

Methodology applied:

The assessment of these risks and opportunities has been carried out by integrating two main approaches:

1. **LEAP methodology**

   Applied to identify and analyse environmental impacts arising from Tubacex's industrial activities, enabling the prioritisation of areas with the highest exposure or vulnerability to pollution.

2. **Enterprise Risk Management (ERM) framework based on COSO**

   This framework has been used to assess the materiality of the identified risks and their relevance to the business, incorporating a structured and consistent perspective for decision-making.

Both methodologies allow for a coordinated assessment of physical risks arising from emissions to air and water, waste generation or discharges, as well as opportunities derived from technological improvements, reductions in consumption and compliance with environmental standards required at European level.

Scope of the analysis:

The assessment process includes the facilities selected on the basis of the previously conducted materiality analysis. Their materiality has been assessed using variables such as total revenue, raw material consumption, production, waste generation, and consumption of groundwater and non-groundwater sources. Following this prioritisation, the most significant environmental aspects of each site were identified, which could give rise to pollution-related impacts, risks or opportunities.

The analysis has been focused exclusively on Tubacex's own operations. Due to the limited information available on value chain actors, the identification and assessment of physical risks in upstream and downstream stages have not been included in this exercise, although their incorporation is envisaged in future assessments.

Assumptions and sources of information:

The identification and assessment of pollution-related IROs have been carried out based on technical documentation provided by the plants, as well as other secondary information sources for the steel industry, such as:

- Technical documentation – environmental management systems of the plants.
- Best Available Techniques Reference Documents (BREF/BAT) relevant to the steel and surface treatment industries:
  - Best Available Techniques (BAT) Reference Document for the Ferrous Metals Processing Industry (2022)
  - Best Available Techniques (BAT) Reference Document for Iron and Steel Production (2013)
  - Best Available Techniques (BAT) Reference Document for Surface Treatment of Metals and Plastics (2006)
  - Kick-off meeting report for the review of the STM BREF (2022)
  - First draft (D1) of the revised STM BREF (2025)

These sources provide robust and comparable criteria for assessing risks, as well as updated technical references for identifying opportunities to reduce emissions and improve environmental performance.

Expert judgement has been considered in the analysis of pollution-related IROs; however, in addition to this specialised review, Tubacex has and uses various information sources and consultation channels to ensure an inclusive and transparent approach. The Company maintains active social media profiles and its website to share environmental information and receive feedback, and participates in sectoral conferences and events where it benchmarks its practices against other stakeholders. Through these mechanisms, Tubacex integrates input from its stakeholders into the identification and management of pollution risks, thereby strengthening collaboration and informed decision-making.

Tubacex has identified the most relevant pollution aspects through the review of technical documentation from material sites, reference documents on Best Available Techniques (BAT), and the TNFD sector guidance for the metals and mining industry. In addition, parameters such as the geographical location of the plants, as well as their proximity to protected areas (such as the Natura 2000 Network) and/or urban areas that could be adversely affected, have been considered.

The highest-priority **risks and opportunities** are set out below:

Physical risks	Impact
Air pollution due to atmospheric emissions of particulate matter (PM), heavy metals, dioxins and furans, and PAHs. Risk factor: Failure of the melting furnace gas cleaning system.	At the Acerálava plant, scrap melting and refining in the AOD converter generate gases containing particulate matter and pollutant compounds, which are treated through gas cleaning systems to ensure emissions remain below legal limits. Due to the presence of pollutants such as heavy metals, SOx, NOx, HCl, HF, VOCs, CO, dioxins and furans, a failure in the filtration system could result in emissions exceeding permitted values and adversely affect health and the environment, making this process highly sensitive from an environmental perspective. To prevent these risks, the facility carries out comprehensive monitoring through continuous tracking of the emission source, including a CEMS connected to the Basque Country Air Quality Control Network, enabling rapid detection of any anomaly and ensuring regulatory compliance.
Air pollution due to the emission of acid vapours from pickling processes. Risk factor: Failure of gas cleaning systems.	Surface treatment processes, such as pickling, generate acid vapours that may contain SOx, NOx and HF, derived from the nature of the products used. These emissions are treated in scrubbers designed to reduce their concentration and ensure compliance with legal limits. Malfunctioning of these scrubbers could result in insufficient treatment and the exceedance of emission limit values, increasing the vulnerability of the plants to environmental impacts and potential regulatory non-compliance, with negative effects on air quality in surrounding areas. To mitigate these risks, TUBACEX plants implement preventive and corrective measures that ensure adequate process control and compliance with applicable environmental regulations
Pollution generated by discharges into water systems. Risk factor: Failure of treatment systems.	The steel industry generates wastewater during the normal operation of its industrial processes. These waters typically carry acidic contaminants, solids, as well as various oils, and are treated to comply with the discharge conditions established in the plants' discharge permits, generally through mechanical treatment for solid separation and physicochemical treatment for the neutralisation and separation of acidic waters. Malfunctioning of these treatment systems may result in the discharge of contaminated water into receiving water bodies, causing pollution issues. The Tubacex plants assessed as having the highest exposure to physical pollution-related risks are TTI (Llodio) and TTP (India), mainly due to their proximity to urban areas and watercourses.

Table 39: Highest-priority pollution-related risks and opportunities

Transition risks	Impact
Tightening environmental regulation and negative public perception due to impacts on air quality and health. Type of risk: Reputational	The update of the World Health Organization (WHO) Air Quality Guidelines in 2021 and the recent adoption of Directive (EU) 2024/2881 on ambient air quality have established more stringent limit values for pollutants such as NO_2, PM2.5, PM10 and SO_2, strengthening the regulatory framework and public awareness regarding the impacts of air pollution on health. In this context, industrial activities associated with emissions of particulate matter and pollutant gases, such as those of Tubacex, may be subject to increased social and regulatory scrutiny.
Increased stakeholder concern regarding pollution and its prevention and control. Type of risk: Reputational	The EU Action Plan "Towards Zero Pollution for Air, Water and Soil", together with other pollution prevention and control initiatives, is leading stakeholders to become increasingly aware of environmental issues and to favour products and services from companies that demonstrate sustainable and responsible practices in relation to pollution prevention and control. In this context, inadequate management of environmental impacts could result in significant consequences in terms of stakeholder trust, product demand, investment and relationships with local communities.

Table 40: Highest-priority pollution-related risks and opportunities

Opportunities	Impact
Increased demand for more sustainable products and services. Type of opportunity: Products and services	The update of the World Health Organization (WHO) Air Quality Guidelines in 2021 and the recent adoption of Directive (EU) 2024/2881 on ambient air quality have established more stringent limit values for pollutants such as NO_2, PM2.5, PM10 and SO_2, strengthening the regulatory framework and public awareness regarding the impacts of air pollution on health. In this context, industrial activities associated with emissions of particulate matter and pollutant gases, such as those of Tubacex, may be subject to increased social and regulatory scrutiny.
Increased stakeholder concern regarding pollution and its prevention and control. Type of opportunity: Products and services	Growing environmental concern among consumers, companies and regulators is driving demand for more sustainable products and services, representing an opportunity for Tubacex to expand its customer base and strengthen its competitive position. Through the implementation of more efficient processes and the use of raw materials with a lower impact on health and the environment, the Company can reduce its emissions and environmental footprint, strengthening its reputation and generating benefits in terms of sales and operational efficiency.
Implementation of new BAT (Best Available Techniques) to reduce environmental impact. Type of opportunity: Resource efficiency	Best Available Techniques (BAT) for both the ferrous metals processing industry and the surface treatment of metals and plastics represent the most advanced and effective methods for establishing emission limits and conditions to minimise environmental impact. Facilities within their scope of application have the opportunity to implement advanced technologies and optimise their operational practices to reduce pollutant emissions to air, water and soil, thereby minimising the environmental impact of their operations. Likewise, the adoption of these BAT may generate significant operational benefits, such as improvements in energy efficiency, reduction in resource consumption, regulatory compliance, strengthening of corporate sustainability and consolidation of their competitive position in the market.

Opportunities	Impact
Increased transparency of environmental practices and policies arising from the disclosure obligations of the CSRD Directive. Type of opportunity: Reputational	The Corporate Sustainability Reporting Directive (CSRD) establishes new environmental disclosure requirements, including a specific section dedicated to pollution, which represent an opportunity for companies to strengthen their reputation through greater transparency. By addressing these obligations with a proactive approach and demonstrating its commitment to pollution prevention and control, Tubacex can strengthen trust and relationships with its stakeholders, improving its credibility and positioning.

Table 41: Highest-priority pollution-related risks and opportunities

For more detailed information on impacts, risks and opportunities, their relationship with the value chain and Tubacex's strategy, please refer to Table 14 in section 1.3.3 of this report, as well as Table 2 in Annex II "Detail of material impacts, risks and opportunities".

2.2.2 Policies related to pollution (E2-1).

(E2-1: 15 a-15 b-15 c-AR11)

Commitments related to pollution are set out in the General Sustainability Policy and in the Environmental and Climate Action Policy. These policies are described in greater detail—including their main contents and objectives—in Annex III Corporate Policies.

Tubacex recognises the importance of managing and mitigating the environmental impacts arising from its industrial activities and those of its value chain, as well as its responsibility to protect the environment and prevent pollution. Accordingly, it specifically addresses the following commitments in its Integrated Environmental Policy, associated with the different material impacts, risks and opportunities (IROs) identified in this area:

Material IRO	Associated commitment
• **Alteration of air quality with negative consequences for human health, as well as ecosystems and living beings.** • **Noise pollution.** • **Alteration of water quality due to the discharge of polluting substances, with negative consequences for human health and other living beings (aquatic ecosystems).** • **Alteration of soil quality without generating risks to human health or ecosystems.** • **Soil contamination with negative effects on ecosystems, living beings and employees or the local community**	• Commitment to avoid, mitigate or remedy impacts arising from any activity that generates pollutants to air, water and soil, including ensuring the minimisation of the use of hazardous substances and the implementation of the necessary procedures and measures to prevent environmental impacts arising from operations under normal or emergency conditions. • Implementation of best technologies associated with wastewater treatment and atmospheric emission systems in order to comply with and exceed local environmental standards, thereby avoiding significant harm to water bodies and the atmosphere.

Table 42: Relationship between material pollution-related IROs and associated commitments

The Integrated Environmental Policy does not include commitments related to the minimisation and substitution of substances of concern or the progressive phase-out of substances of very high concern, as these are not considered material for the organisation.

Regarding emergency situations, Tubacex assumes in its policy the commitment to maintain and periodically review an environmental emergency plan that ensures a rapid, coordinated and effective response to any incident with potential impact on the environment.

Furthermore, in compliance with the Environmental Liability Law, the ACERÁLAVA, TTI Llodio and TTI Amurrio plants have their corresponding environmental risk analyses, in which, among other aspects, the environmental hazards and causes arising from the substances used and the industrial activities carried out at the plants are identified. In this way, the magnitude of the identified risks is assessed and it is determined whether additional risk minimisation measures should be implemented to reduce impacts on people and the environment.

2.2.3 Actions and resources related to pollution (E2-2).

(E2-2: 18-AR 12-19. ESRS 2: 68 a-68 b-68 c-68 d-68 e-69 a-69b)

Tubacex has identified all actions carried out with an impact on the management of pollution-related IROs, based on the analysis of technical documentation from its plants derived from their environmental management systems, life cycle assessments, environmental impact assessments, etc. To this end, it is progressively strengthening its pollution prevention and control levers, integrating technical, operational and management solutions aimed at minimising the environmental impact of its activities and ensuring compliance with regulatory requirements and applicable sustainability standards.

All the actions presented in this section contribute to achieving the objective “Protect the environment and prevent pollution” set out in its Environmental and Climate Action Policy. In this regard, Tubacex plants have the following measures in place, which have already been implemented across various sites and are actions that were introduced previously but remain in force during 2025.

It should be noted that no actions have been implemented to establish remedial measures for individuals affected by material actual impacts, as no cases requiring direct intervention of this type have been identified.

In the area of atmospheric pollution, the Group has prioritised the implementation of technical measures at source, including the installation and improvement of emission capture and treatment systems, as well as the modernisation of combustion equipment and its control systems. These actions, supported by specific investments, enable improvements in process efficiency and reductions in associated emissions.

For the management of discharges and the protection of the water environment, Tubacex applies a preventive approach based on environmental management systems, periodic monitoring of key parameters and maintenance of treatment equipment, complemented by investments aimed at strengthening operational control and optimising water consumption.

Regarding noise pollution, the Group combines systematic measurement of noise levels with the application of best available techniques for its mitigation, integrating these actions into the routine management of its facilities.

Furthermore, regarding the value chain, during 2024 Tubacex carried out an analysis of the management of procurement processes and the supply chain, with a focus on sustainability. This analysis has made it possible to identify the main areas for improvement and propose specific initiatives to address them, thereby establishing a roadmap towards more sustainable procurement and supply chain management. The analysis included the selection of the main procurement categories and geographies, followed by the identification and analysis of ESG (environmental, social and governance) risks. A detailed review of the main supply chains was also carried out, focusing on the inherent ESG risks associated with each category and geographical region.

The different actions are detailed below, classified according to their nature, which have been continuously developed over recent years and have achieved a high level of implementation and compliance, thus remaining in force during the current financial year:

Environmental Management:

- Facilities have an environmental management system that facilitates the monitoring and periodic maintenance of the different equipment with the greatest environmental impact (scrubbers, filters, treatment systems, among others) and the monitoring of environmental parameters (effluents, gas emissions, noise levels). This ensures compliance with authorised limits and minimises risks associated with pollution and emissions. This action falls within the “avoid pollution” level of the mitigation hierarchy and is mainly applied in European plants.

Preventive Infrastructure:

- **Impermeable surfaces and paving:** impermeable materials are used in storage areas and paved surfaces to prevent the infiltration of contaminants into soil or groundwater. This action falls within the "avoid pollution" level of the mitigation hierarchy and is mainly applied in European plants.

- **Closed systems:** in industrial processes (such as cooling), closed circuits are used to optimise resource use and prevent discharges. This action falls within the "avoid pollution" level of the mitigation hierarchy and is applied across all plants.

Control of atmospheric emissions and discharges to water:

- **Prevention of leaks and spills**: implementation of plans and equipment (sealed trays, tanks with resistant coatings) to contain potential contaminants in critical areas. This action falls within the "avoid pollution" level of the mitigation hierarchy and is applied across all plants.

- **Extraction and monitoring systems**: external controls carried out by Environmental Collaboration Entities (ECA) on atmospheric emissions, discharges and noise, as well as monitoring of flow rates and concentrations of emitted pollutants to ensure compliance with environmental regulations. This action falls within the "reduce pollution" level of the mitigation hierarchy and is mainly applied in European plants.

- **Continuous Emissions Monitoring System (CEMS):** implementation of automatic continuous measurement systems at the main emission source, installed at the ACERÁLAVA plant and connected to the Air Quality Control Network of the Autonomous Community of the Basque Country, subject to maintenance, calibration and periodic control requirements. This system enables permanent monitoring of particulate emissions, facilitating early detection of deviations or potential failures in treatment systems, and ensuring compliance with emission limit values. This action falls within the "reduce pollution" level of the mitigation hierarchy.

Reduction of Acoustic Impact:

- Implementation of **specific acoustic insulation** solutions in interior walls and roofs of industrial buildings, in order to minimise the transmission of airborne noise to the outside or to other work areas. Application of operational measures aimed at noise reduction. This action falls within the "avoid pollution" level of the mitigation hierarchy and is mainly applied at TTP.

Best Available Techniques (BAT):

- **Incorporation of advanced practices** such as proper storage of hazardous substances, controlled waste handling, and efficient facility design to reduce environmental impacts. This action falls within the "avoid pollution" level of the mitigation hierarchy and is mainly applied in European plants.

Overall, these initiatives reinforce a management model focused on prevention at source, operational control and continuous improvement, contributing to the robustness and credibility of the sustainability reporting system, in line with financial control practices and applicable verification requirements.

Disclosing these actions and resources related to pollution is essential to demonstrate a proactive approach to sustainability and environmental risk management. Tubacex recognises that failing to act or to allocate sufficient resources to address pollution risks may result in regulatory sanctions, conflicts with local communities and reputational damage. Conversely, strategically allocating resources to these areas may generate significant opportunities, such as improvements in operational efficiency and a favourable market positioning.

The classification of actions based on the mitigation hierarchy makes it possible to prioritise those with the greatest positive impact on pollution management. Tubacex sites have environmental management systems in place, which incorporate a structured approach to managing environmental impacts, prioritising the following stages: avoid, minimise, restore and compensate. This involves determining whether an action is designed to prevent pollution, reduce its intensity, restore affected areas or compensate for residual impacts.

During the 2024 financial year, the economic resources implemented in relation to the management and control of pollutants amounted to 101,295€ in CapEx, mainly linked to technological improvement actions and optimisation of control systems. These investments are integrated into regular investment plans and do not correspond to structural or extraordinary projects.

No material recurring operational impacts associated with these initiatives have been identified, nor significant costs or savings requiring separate monitoring.

In the 2025 financial year, actions related to this matter continue to be integrated into general operating budgets and ordinary investment plans, with no specific items of a material nature identified that would justify their quantitative breakdown.

In application of the principle of proportionality and materiality, the Company considers that individualised financial information for 2025 is not material for a proper understanding of its performance in relation to pollution management.

2.2.4 Targets related to pollution (E2-3).

(ESRS 2: 81 b. E2-2:22-23-24.)

Within the framework of its current ESG Plan, Tubacex has not yet defined specific corporate parameters or targets related to the minimisation of impacts, risks or opportunities associated with pollution through emissions to water, soil or air pollutants, nor does it monitor the effectiveness of its policies and actions with respect to these impacts, risks and opportunities, as the plan has primarily focused on addressing other aspects considered more critical for the Company in the field of sustainability.

Nevertheless, Tubacex does have specific mandatory targets whose level of ambition is linked to the regulations applicable to the different plants and locations in which the Company operates. These targets are related to not exceeding certain legal thresholds in parameters associated with atmospheric pollution from potentially polluting activities (emission sources from the steel plant and other auxiliary processes), as well as thresholds related to water pollution, whether concerning public water bodies or wastewater collection systems. In relation to these targets, it should be noted that at Tubacex plants in the Basque Country (TTI and ACERÁLAVA), all atmospheric emission sources are equipped with treatment systems and/or process control systems to ensure compliance with established environmental standards.

In addition, accredited bodies carry out periodic verifications in accordance with the requirements of the corresponding Integrated Environmental Authorisations (IEA). Regular controls are also conducted to ensure that noise levels remain within regulatory limits. Regarding light pollution, the plants have implemented more efficient systems and low-consumption lighting, complemented by periodic measurements to ensure proper management in this area. In future ESG plans, the possibility of establishing specific objectives and targets in this area will be assessed, in line with the evolution of operations and the business, local needs and stakeholder expectations, thereby reaffirming the Company's commitment in this matter. The base year from which progress will be measured is 2023, corresponding to the first year of disclosure of pollution-related parameters in this report.

2.2.5 Air, water and soil pollution (E2-4).

(E2-4: 28 a-30 b-30 c-31)

The quantities of pollutants emitted to air and water, in tonnes per year, are set out below:

Atmospheric pollutants (kg/año)	Plants in Europe		Plants outside Europe		Total	
Year	**2024**	**2025**	**2024**	**2025**	**2024**	**2025**
Nitrogen oxides (NO_x/NO_2)	74,516.02	169,962.42	17,937.34	0	92,453.36	169,962.42
Nickel and compounds (as Ni)	45.67	6.25	10.48	0	56.15	6.25
PCDD + PCDF (dioxins + furans) (as TEQ)	0	0.00	0	0	0	0.00
Total organic carbon (TOC) (as total carbon or COD/3)	5,420.11	1,220.60	1,243.68	0	6,663.79	1,265.60
Particulate matter (PM)	0.00	6,858.63	0	1,597	0.00	8,455.63
Trichloroethylene	0.00	0.00	0	48,398	0.00	48,398.00

Table 43: Air pollutants

European plants considered: ACERÁLAVA, TTI AMURRIO, TTI LLODIO, IBF, SBER.
**Plants outside Europe considered: SALEM, DURANT, TTP.*

Water pollutants (kg/año)	Plants in Europe		Plants outside Europe		Total	
Year	**2024**	**2025**	**2024**	**2025**	**2024**	**2025**
Ammonia (NH_3)	5.88	0.45	0.80	91.69	6.68	92.14
Nitrogen oxides (NO_x/NO_2)	26.67	0	3.61	0	30.28	0
Total phosphorus	45,766.91	63.48	20.53	0	45,787.44	63.48
Chromium and compounds (as Cr) (8)	157.56	117.61	3.43	0.65	160.99	118.26
Nickel and compounds (as Ni) (8)	645.08	248.54	8.58	15.00	653.66	263.54
Trichloroethylene	0	0	1,153.00	1,376.00	1,153.00	1,376.00
Fluorides (as total F)	6,343.09	48.53	858.86	0	7,201.95	48.53

Table 44: Water pollutants

European plants taken into account: ACERÁLAVA, TTI AMURRIO, TTI LLODIO, IBF, SBER.
**Plants outside Europe considered: SALEM, DURANT, TTP.*

The data presented in the tables above are the result of the aggregation of the mass emissions of each parameter emitted by the different plants within the scope that exceed the thresholds established by the PRTR (European Pollutant Release and Transfer Register) or are very close to exceeding them.

All pollutants have been quantified through direct measurements. In the case of those material facilities for which updated data are not available—because they were not available at the time of preparation of this report—such as atmospheric pollutants from the ACERÁLAVA, TTI AMURRIO and TTI LLODIO plants, estimated data based on those corresponding to the last closed financial year, 2024, have been incorporated.

The differences observed between the results from one financial year to another are mainly due to a methodological change and improvements in the reporting process. To fill information gaps, some data for 2023 and 2024 were estimated and extrapolated considering production levels, using measurements from other plants as a reference, even though these may not fully represent their actual production reality. As production processes are not fully equivalent, this results in the variations observed.

For those parameters measured directly, no additional uncertainties are included, other than those inherent to the measurement instruments themselves. In order to comply with applicable legislation, these measurements are carried out by an accredited body that uses the established reference standards for such measurements. The Integrated Environmental Authorisations of the different plants specify the pollutants to be measured in each discharge or emission stream, as well as the frequency with which samples must be taken for analysis. These measurements make it possible to assess regulatory compliance and guide corrective actions where necessary. Success is measured through monitoring compliance with legal limits, tracking potential non-compliances, and analysing the results obtained by accredited external bodies that carry out periodic assessments.

With regard to pollutants discharged into water, comprehensive policies and processes are also applied, aimed at the identification and classification of potential water pollutants, in line with the environmental management system aligned with the ISO 14001 standard. Initial assessments focus on the detection of substances with the potential to generate adverse impacts on water bodies and associated ecosystems, such as heavy metals and chemical residues.

Accordingly, a thorough analysis of all materials used in production is prioritised, taking into account their chemical properties and potential risks to the environment. In addition, continuous monitoring of the composition of wastewater has been carried out to ensure compliance with legal requirements and to effectively manage risks to aquatic ecosystems and human health.

With respect to pollutants affecting the receiving medium of soil, the analysis of IROs of significant relevance limited the scope to the Álava steel plant, due to the nature of the activity carried out. In accordance with the Resolution of 8 March 2016 issued by the Vice-Minister for the Environment, whereby the integrated environmental authorisation for the steelmaking activity is reviewed, amended and made effective, it is established that this activity must comply with the stipulated conditions and requirements, particularly with regard to the implementation of an Environmental Monitoring Programme (EMP). This EMP specifically covers controls on atmospheric emissions, the quality of discharged water, activity indicators and noise levels. In addition to what is specified in this programme, periodic monitoring of groundwater (every 5 years) and soil (every 10 years) must also be included, in accordance with Article 10 of Royal Decree 815/2013, when a new intervention is carried out.

Regarding the latest available report on the periodic monitoring of groundwater and soil carried out in 2022, which included sampling of groundwater and soil, it should be noted that there has been no exceedance of the applicable monitoring frequencies (previously mentioned). In this regard, and in accordance with the aforementioned resolution, "controls with a frequency greater than one year shall be submitted only within the programme corresponding to the year in which the control is carried out".

With regard to PRTR (European Pollutant Release and Transfer Register) reporting requirements, direct emissions to the receiving medium of soil are neither recorded nor reported, as this is not required under the provisions of the European Regulation (Regulation (EC) No 166/2006 of the European Parliament and of the Council). This regulation only establishes the reporting of data relating to pollutants in the receiving medium of soil in the following two specific waste disposal operations: land treatment (biodegradation of waste in a terrestrial environment) and/or deep injection. It is important to note that this exclusion does not imply non-compliance with the requirements applicable to the steel plant, in accordance with the provisions of the Integrated Environmental Authorisation (IEA). Evidence of compliance with these requirements is submitted annually to the Basque Government in the report corresponding to the Environmental Monitoring Programme.

2.2.6 Expected financial effects of pollution-related impacts, risks and opportunities (E2-6).

In compliance with the transitional provisions set out in requirement 10.4 of ESRS 1 and Appendix C, as well as the delegated act known as the "Quick Fix", Tubacex avails itself of the option to omit the information required in this section.

2.3 Water resources (E3)

2.3.1 Description of the processes for identifying and assessing material water and marine resources-related impacts, risks and opportunities (ESRS 2 IRO-1).

(ESRS 2-IRO-1: 8a-8b-AR1)

Tubacex considers it essential to carry out and disclose assessments related to water and marine resources in order to identify and mitigate associated operational, regulatory and reputational risks. However, as marine resources are not considered a material aspect for the Company, this section focuses exclusively on freshwater resources.

The analysis of the effects of Tubacex's activities on these resources presents cross-cutting characteristics closely linked to other environmental areas. For example, impacts on water bodies may translate into impacts on nature, just as climate change may affect water bodies. Likewise, certain environmental pollution events may have a direct impact on water resources.

Sources of information:

The analysis of water resources has been carried out using the LEAP approach proposed by the TNFD, through which the context of material sites, as well as impacts, dependencies, risks and opportunities related to water consumption, have been analysed. To this end, a comprehensive review of the documentation of Tubacex's material sites has been conducted, together with technical information on the application of TNFD in the metals industry, publicly available data and other relevant secondary sources for the steel sector. The objective has been to identify the sites whose activity and relationship with water resources make them significant within the water resources area.

Scope of the analysis:

The assessment process began in 2024 with the evaluation of 43 key locations—including steel production plants, distribution centres, warehouses and corporate offices—and their prioritisation based on the previously conducted materiality analysis. Their materiality was assessed using key variables such as revenue, raw material consumption, production, waste generation and water consumption. Following the Pareto Principle, it was determined that 80% of the impact in each criterion is mainly concentrated in the following key sites: Acería de Álava, Tubacex Tubos Inoxidables and Tubacex Assets (Spain), Schoeller Bleckmann Edelstahlrohr (Austria), Tubacex Tubes and Pipes (Umbargeon, India), IBF (Piacenza and Vittuone, Italy), Salem Tube and Tubacex Durant (USA), TBX Upstream (Abu Dhabi).

For the update of the study in 2025, the material sites were taken as a reference due to their impact-related activity, comprising 22 sites with operational presence. For each of these sites, WWF Water Risk Filter ratings (riskfilter.org/water) were analysed for the following water sensitivity risk criteria:

- Water availability (water stress)
- Drought
- Flooding
- Water quality
- Status of the water ecosystem service

Based on the results of this analysis, the material sites were selected, and the additional location of Dubai NTS was included, which, although not considered material based on its exposure according to the variables analysed, its high-risk rating in terms of water availability (4.8 – WWF) led to its inclusion in the water resources analysis.

Methodology for identifying and assessing physical risks:
The identification of impacts and risks at Tubacex was based on the IPCC formula: Hazard × Exposure × Vulnerability, where vulnerability includes sensitivity and adaptive capacity. This methodology enables a consistent analysis across environmental areas and considers the following specific variables for the water resources area:

- **Hazard (Pressure):** External factors identified based on TNFD and tools such as ENCORE, Aqueduct and the Water Risk Filter. Pressures include emissions of toxic pollutants to water and soil, volume of water use, and three dependencies: global climate regulation services, water flow regulation services and water supply. The hazards used to determine how the impacts caused by these pressures are intensified include: water availability risk, drought and flood risks, and water quality.

- **Exposure:** The parameters used include the status of ecosystem services (assessed using the WWF Water Risk Filter) and the strategic importance of the site, which provide context for each location in relation to water resources.

- **Vulnerability:** Defines sensitivity according to the likelihood of alteration of aquatic ecosystems, effects on the site and the site's dependence on ecosystem services for the proper functioning of its direct operations, also considering the adaptation measures implemented by Tubacex.

From the intersection of these variables, various physical risks were identified, including water resource pollution, reduction in water flow in the area, reduced water supply for production processes, and increased flooding that may affect infrastructure. These risks were classified into very low, low, medium, high or very high categories based on their inherent criticality and their residual criticality, considering Tubacex's adaptation measures.

Methodology for identifying and assessing transition risks and opportunities:

The assessment of transition risks is based on the intersection between the likelihood of occurrence of the risk and its potential impact on Tubacex, using a qualitative scale. The likelihood score is assigned considering whether the identified risk has materialised in the past or could do so in the near future. The impact score, in turn, assesses the potential economic, organisational, reputational and environmental consequences for Tubacex.

Regarding opportunities, their assessment is carried out by combining the potential to leverage the opportunity and its effectiveness. The potential score is assigned qualitatively, considering the capacity to integrate the opportunity within a given timeframe. For example, if there is the possibility of leveraging the opportunity during the current financial year or if it is already being capitalised on, the rating will be very high; conversely, if the capacity to integrate it is low or non-existent, the rating will be very low. The effectiveness score is determined by assessing the positive impact that the opportunity may generate in areas such as business operations, efficiency, the robustness of the corporate strategy, profitability, market positioning and reputation, classified on a scale ranging from very low to very high.

The analysis of impacts, risks and opportunities has been carried out with the support of subject matter experts. However, Tubacex recognises the importance of effective consultation on water resources to mitigate social, regulatory and operational risks. Furthermore, disclosing how such consultations are conducted strengthens trust and the Company's reputation, demonstrating a commitment to sustainability and transparency. Therefore, in future financial years, it is planned to incorporate this type of action into water resource management and the assessment of associated risks.

The highest-priority risks and opportunities are set out below:

Physical risks	Impact
Contamination of water resources Type of risk: Reputational	Tubacex's industrial activity may generate emissions of harmful substances that negatively affect nature. This risk maintains a higher level of residual criticality at sites located in areas of greater risk due to the degradation of water quality, in line with geographical indicators from the WWF Water Risk Filter & Aqueduct. Nevertheless, Tubacex has implemented corrective and adaptation measures to address these phenomena, and a number of additional mitigation actions are currently being implemented at sites identified as priorities.

Transition risk	Impact
Changes in social or stakeholder perception due to competition for natural resources. Type of risk: Reputational	Competition for scarce natural resources, such as water, minerals and land, is increasing globally. This competition may lead to changes in social or stakeholder perception towards companies that depend on these resources, such as Tubacex.
Tightening of regulations on the protection of nature and natural resources Type of risk: Emerging regulation	The growing biodiversity crisis and pressure on resources are giving rise to stricter regulations requiring greater due diligence, traceability and transparency, as well as limits on resource use and higher costs for non-compliance. For companies, this implies new requirements for the assessment and management of impacts and dependencies on nature, potential restrictions or extraction quotas, "no net loss" conditions, and strengthened reporting and auditing obligations within the supply chain.

European directive establishing a catalogue of environmental offences subject to criminal penalties Type of risk: Emerging regulation	The tightening of European and national regulations on water abstraction, consumption and discharge —including stricter enforcement— increases requirements in terms of permits, control and effluent quality, and may require additional investments, limit production during periods of scarcity, and raise operational costs related to treatment and recirculation. To mitigate these risks, Tubacex continuously monitors water quality indicators and applies measures such as recirculation, the use of closed-loop systems, and the implementation of Best Available Techniques (BAT) and treatment systems to optimise water consumption and improve discharge quality.
Oppotunities	**Impact**
Improvements in valuation and incorporation of sustainable water management certifications. Type of opportunity: Reputational	With the increasing occurrence of more frequent and severe droughts due to climate change, it is essential to improve water management and optimise its consumption, particularly in regions more susceptible to water scarcity. In this regard, Tubacex may implement various strategies to reduce water consumption, including the implementation of environmental management systems based on recognised frameworks, while at the same time strengthening transparency in processes.
Increase in the transparency of environmental practices and policies arising from the disclosure requirements of the CSRD Directive. Type of opportunity: Reputational	Increasing requirements under the CSRD disclosure framework demand greater transparency in the management of critical resources such as water, as well as in information-gathering processes.

Table 45: Priority risks and opportunities related to water resources

Effectively addressing these issues can prevent significant risks, such as regulatory sanctions, conflicts with local communities or reputational damage affecting the confidence of investors and customers. From an opportunity perspective, the identification of material aspects enables the Company to develop more effective strategies to mitigate negative impacts, leverage technological innovations and explore new markets associated with the sustainable management of water and marine resources.

For more detailed information on impacts, risks and opportunities, their relationship with the value chain and Tubacex's strategy, please refer to Table 14 in section 1.3.3 of this report, as well as Table 2 in Annex II: Detail of material impacts, risks and opportunities.

2.3.2 Policies related to water resources (E3-1)

(E3-1: 11-12ai-ii-iii-12b-12c-13-14)

Commitments related to water use are set out in Tubacex's General Sustainability Policy and in its Environmental and Climate Action Policy. These policies are described in greater detail —including their main contents and objectives— in Annex III: Corporate policies.

It should be noted that, within the framework of its Environmental and Climate Action Policy, Tubacex assumes the following commitments in relation to water resource management:

- To maintain effective water and emissions treatment systems, ensuring compliance with and exceeding applicable environmental standards.
- To continuously improve efficiency in water use by applying recycling, reuse and consumption reduction strategies.

In this regard, the following commitments associated with the identified material impacts, risks and opportunities (IROs) are established:

Material IRO	Associated commitment
• **Depletion of water resources** • **Alteration of the quality of water resources (surface or groundwater)** • **Opportunity to improve water management, reuse and recycle water in the process** • **Risks of water scarcity and supply restrictions, including price increases due to scarcity, affecting the Company's ability to operate efficiently and increasing production costs** • **Risk of legal disputes over water rights and access to water resources if the Company were to carry out excessive water abstraction, thereby impacting water availability in the region in which it operates** • **Risk of litigation for environmental damage and fines and penalties for non-compliance with regulations**	• Implementation of measures aimed at optimising water consumption, promoting efficient and responsible use of this essential resource across all operations, regardless of whether they are located in areas of high water stress or not • Protection of the environment and prevention of pollution to air, water, soil and from noise, and appropriate management of waste and hazardous products • Implementation of best available technologies associated with wastewater treatment systems and atmospheric emissions in order to comply with and exceed local environmental standards, thereby avoiding significant damage to the public water domain and the atmosphere • Compliance with legal requirements and other voluntary requirements: Tubacex ensures strict compliance with all applicable laws and regulations and other voluntary commitments subscribed to in the regions where it operates, including exceeding such standards whenever possible

Table 46: Relationship between material IROs related to water resources and associated commitments

The commitments set out in the policies are reflected in specific actions detailed in their respective sections. Notably, actions aimed at optimising water consumption and supply stand out, such as the use of wastewater and the implementation of closed-loop cooling systems. Likewise, the commitment to water quality is materialised through the monitoring of wastewater and the control of discharges.

Tubacex has not included specific commitments related to the design of products and services aimed at addressing water-related issues and the conservation of marine resources. Furthermore, it has not included in its policy specific commitments related to reducing material water consumption in areas of water stress within its own operations or across upstream and downstream value chain stages. However, these aspects are addressed through specific projects and actions, which will be presented later in the document. The absence of specific commitments in the policy is due to the fact that the Group's general commitments apply to all its plants, without focusing exclusively on those located in areas of high water stress.

Through these commitments, the aim is not only to mitigate negative impacts and risks, but also to leverage opportunities related to the implementation of innovative technologies for water recycling and reuse, and improvements in water efficiency in production processes.

Tubacex has not included specific commitments related to the sustainable use of oceans and seas, as these have not been considered material in the double materiality analysis carried out.

2.3.3 Actions and resources related to water resources (E3-2)

(ESRS 2: 68a-68b-69a-69b. E3-2: 17-19)

Tubacex is promoting, within the framework of its Water Resources Improvement Project, a set of structural initiatives aimed at improving efficiency in water use and strengthening discharge control, integrating technical, operational and monitoring solutions throughout its production processes.

The Group's approach is based, on the one hand, on strengthening water treatment and control infrastructure through projects involving the unification and separation of streams, improvements to treatment plants and the removal of specific contaminants, enabling greater control of effluents prior to discharge and ensuring compliance with applicable regulatory limits.

On the other hand, Tubacex is making progress in reducing water consumption and optimising the use of this resource through reuse and recirculation initiatives, such as the recovery of neutralised water, the implementation of closed-loop cooling systems and the reuse of process water in key industrial operations. These actions contribute to reducing the consumption of potable water and minimising pressure on water resources.

This model is complemented by the strengthening of environmental management systems through enhanced monitoring and control, including improvements in the quality of consumption data, the installation of automatic shut-off valves and the incorporation of advanced control systems that allow water use to be adjusted to the actual needs of the processes.

At plants located in water-stressed areas, actions are focused on ensuring water quality, as the contamination of water bodies represents the most significant physical risk in relation to Tubacex's impacts on water resources. To this end, continuous monitoring of water samples and periodic control of wastewater discharges are carried out.

Overall, these initiatives reflect an approach focused on water efficiency, the prevention of environmental impacts and continuous improvement, strengthening the robustness and credibility of the Group's sustainability reporting system and aligning water management with control practices applicable in other key areas.

The actions described contribute to the achievement of the goals and objectives of the policies relevant to water, as they are directly aligned with the commitments set out in the Environmental and Climate Action Policy, specifically with regard to the responsible use of resources and the reduction of water pollution.

No actions have been implemented to establish remedial measures for individuals adversely affected by material actual impacts, as no cases requiring direct intervention of this nature have been identified.

During the 2024 financial year, economic resources allocated to water management amounted to €223,656, mainly linked to operational improvement actions and consumption optimisation. These items are integrated into the ordinary management of the business and do not correspond to structural or extraordinary investments.

No material recurring operational impacts associated with these initiatives have been identified, nor significant costs or savings requiring separate monitoring.

In the 2025 financial year, actions related to this matter continue to be integrated into general operating budgets and regular investment plans, and no specific items of a material nature have been identified that would justify their quantitative breakdown.

In application of the principle of proportionality and materiality, the Company considers that individualised financial information for 2025 is not material for an adequate understanding of its performance in relation to water management.

2.3.4 Targets related to water resources (E3-3)

(ESRS 2 68c-75-77a-77b- 80a-80b-80c-80d-80e-80f-80j. E3-3: 20-21-22-23-25-)

Within the framework of its current ESG Plan, Tubacex has established a specific target for the reduction of water consumption intensity relative to financial value (gross value added – GVA). This target covers consumption within the operational environment, primarily focused on industrial processes, across all Group companies, not only those located in water-stressed areas. For this plan, the measures and targets have been defined internally, with the participation of independent expert personnel and taking into account the relevance of this resource for stakeholders.

Although current regulations do not require the establishment of mandatory targets in this area, the sustainable management of water remains a fundamental pillar in the Group's strategy. Accordingly, various operational measures have been implemented to optimise its use and minimise associated impacts, as documented in section 2.3.3 above. The targets and the projects associated with them are set out in the table below.

Action: Water Resources Improvement Project

Target to be achieved and relationship with policies: Reduce water use intensity by 20%, from 2.3 m³/GVA (base year) to 1.81 m³/GVA, through the implementation of a strategy for efficient water use, water risk management and adaptation plans. Target defined with reference to the base year.
Scope of the action: The entire Group, including all plants and geographical areas in which it operates.

Reference value: 2.3 m³/GVA (water consumption intensity).

Base year: 2019.

Time horizon: 2030.

Actions / Initiatives	Parameter to be measured and definition	Methodologies and significant assumptions	Validation	Performance against the target
Initiatives with a direct impact on reducing water consumption: - Water treatment and purification infrastructure - Water reuse and recirculation - Flow separation and process optimisation - Optimisation of control and monitoring	Water intensity (m³/GVA). Ratio between the total volume of water consumed and gross value added.	The indicator is calculated as the sum of water inputs (surface and municipal) in m³, obtained from water suppliers, divided by Gross Value Added (GVA). Limitations in the calculation arise from the estimates made for its determination in accordance with Table 2 of section 1.1.2.2 of this report, as well as from variations in the production mix, production levels and operating conditions during the financial year.	Internal monitoring and external validation of the aggregated data.	2024 result: 0.89 m³/m€ 2025 result: 0.99 m³/m€ The results show a significant reduction compared to the base year, maintaining a positive trend in water efficiency. The year-on-year variation does not compromise the achievement of the 2030 target, as it remains aligned with the planned reduction trajectory.

Table 47: Actions and targets in the area of water resources

This target is reviewed annually by calculating the water intensity parameter for the current year and analysing the trend in relation to previous years. The current trend is positive, as the target has been achieved and reductions are still ongoing. There have been no significant changes in the Company's performance in achieving the target.

2.3.5 Water consumption (E3-4)

(E3-4: 28a-28b-28c-28d-28e-29)

WATER CONSUMPTION	2024	2025
Consumption of water supplied by the municipal network (m^3)	172,653	184,579
Surface water consumption (m3)	67,984	70,009
Groundwater consumption (m3)	1,490,984	1,435,753
Consumption of recycled or reused water (m^3)	0	0*
Total volume of water stored (m^3)	0	0
Changes in water storage (m^3)	0	0
Total water consumption (m^3) **	**1,731,621**	**1,690,341**
Gross Value Added (GVA) [€m]	269,641	255,618
Water intensity (m^3/€m)	**6.42**	**6.61**
Total water consumption excluding groundwater (m^3)	240,637	256,626
Water intensity excluding groundwater (m^3/€m)	**0.89**	**1.00**

Table 48: Water consumption

** Despite the implementation of measures for water recycling and/or reuse, specific data are not yet available to quantify the improvements achieved.*

*** During the financial year, specific estimates have been made for water consumption in certain Group companies as a result of technical incidents in measurement systems. In the case of Acería de Álava, S.A.U., municipal water consumption for the month of January has been estimated due to a meter change. At TTI – Amurrio, estimates have been made for municipal water consumption during the months of September and December, arising from issues in meter readings, including software errors and the absence of readings from the supplier. At TTI – Llodio, estimates have been made for both municipal and surface water consumption. In the case of municipal water, estimates correspond to the months of September and December as a result of meter reset, and are considered estimated and final data. With regard to surface water consumption, estimates have been applied for several months of the financial year due to recurring technical incidents in the meters (failures, breakages, incorrect readings or inactive meters), in some cases using production-based criteria to ensure data consistency. Finally, at Tubacex Services, S.L., municipal water consumption has been estimated for the month of April and for the period between August and December, due to the lack of available readings.*

Although the evolution of water intensity compared to 2024 is less favourable, the results show a significant reduction compared to the base year, maintaining a positive trend in water efficiency. The year-on-year variation does not compromise the achievement of the 2030 target, as it remains aligned with the planned reduction trajectory.

As part of our commitment to sustainability and the responsible management of natural resources, a comprehensive analysis of the impacts, dependencies, risks and opportunities associated with water scarcity has been carried out. This study, which has considered variables such as sales volume, production in tonnes, water consumption and the geographical location of each facility, has been developed using the WWF Water Risk Filter tool for current time horizons, as well as for 2030 and 2050.

The results obtained show that the plant located in Dubai (NTS Dubai) presents the highest risk (4.9 WWF) of water stress, compared to the results reported last year. Thus, in 2024, areas with water stress were reported based on climate projections obtained from the Climate Scale platform, in relation to the event associated with water scarcity, a parameter derived from the analysis of the average duration of drought events and the number of events recorded. In that financial year, the plants located in Italy (IBF Piacenza) and in Oklahoma (Tubacex Durant) were selected due to the high risk of drought (areas of water risk and high water stress) according to Climate Scale indicators.

In the 2025 financial year, an update of the water stress analysis was carried out based on the WWF Water Risk Filter. This tool provides a parameter for water availability, considering both climatological indicators such as the duration and number of drought events, and the abundance or scarcity of freshwater resources, which significantly affects business activities, such as disruptions in production and supply chains, higher operating costs and constraints on company growth. This parameter is obtained based on the volume of surface and groundwater available in a given area. The level of risk reflects the integration of indicators such as Water Depletion, Baseline Water Stress, Blue Water Scarcity and Groundwater Levels.

This analysis covers all Tubacex Group plants and provides a detailed assessment of water stress, also considering factors such as exposure, sensitivity and the adaptive capacity of the different facilities. With this comprehensive approach, the commitment to sustainable water management is reinforced, ensuring the resilience of operations in the face of climate

change challenges and contributing to the preservation of this essential resource. With regard to the water-stressed areas mentioned, details are provided in the table below:

WATER CONSUMPTION IN WATER-STRESSED AREAS	2024	2025
Total water consumption in water-stressed areas, including high water stress areas (m3)	1,947	1,946

Table 49: Water consumption in water-stressed areas

Tubacex has carried out an analysis of the ecological context of its locations through various bibliographic resources and visualisation tools (WWF based on Aqueduct data). This has made it possible to identify the regions and production plants that may have a greater impact in relation to physical water risks. As part of this exercise, the plants with the greatest dependence on water resources have been assessed, as well as drought indices, in order to determine the most sensitive operations.

The following results stand out:

- With regard to the quality and availability of water resources, the results obtained show significant differences depending on the location of each plant. In the case of the Nervión River, as it passes through Amurrio —where the steel mill and tube extrusion plants are located— a high level of pollution is identified (4 WWF), which directly affects the quality of the water used in operations. By contrast, in Piacenza, where IBF operates, the quality of surface water and aquifers is very good (4.34 WWF), placing it among the best locations within the Group. A similar situation is observed in the abstractions carried out from the Trebia River.

- In Austria, industrial activity depends largely on water resources, although operations are carried out through a closed-loop system using water from an aquifer. The area presents a low drought index (1.5 WWF), which contributes to operational stability. In India, despite the high dependence on water consumption —also sourced from an aquifer— the drought risk is limited (2.3 WWF).

- With regard to locations in Italy, the quality of surface and groundwater bodies is generally considered good; however, the risk associated with water quality is high both in Piacenza (5 WWF as a risk index, despite having good quality) and in Vittuone (4 WWF).

- The plants located in Saudi Arabia and Dubai present a high risk in terms of water quality (4 WWF) and are situated in areas with limited access to water resources. In particular, Dubai presents a particularly high water stress indicator, with very limited water availability (4.8 WWF). However, in these locations, processes requiring large volumes of material water are not carried out.

- With regard to the availability of water resources and hydrological risks, it is relevant to note that some facilities are located in areas of high water stress, where abstraction could represent a significant challenge, particularly in the Nervión basin. Likewise, the Broussard plant is located in an area with a high risk of flooding (4.5 WWF), which requires continuous assessment and adaptation measures in response to extreme events.

Despite these risks, all plants located in areas of high stress or with potential impact on water resources have specific management and mitigation plans aimed at ensuring operational continuity and environmental protection.

Data relating to water consumption are calculated entirely using data obtained from meters and/or invoices, with consumption estimates made as indicated in section “2.3.5 Water consumption (E3-4)”. When calculating water intensity, groundwater abstraction is excluded, as, after use, the water is fully returned to the basin. No models are used; rather, data are obtained from direct measurements.

2.3.6 Anticipated financial effects of impacts, risks and opportunities related to water resources (E3-5)

In compliance with the transitional provisions set out in requirement 10.4 of ESRS 1 and Appendix C, as well as the delegated act known as the “Quick Fix”, Tubacex avails itself of the option to omit the information required in this section.

2.4 Resource use and circular economy (E5)

2.4.1 Description of the processes for identifying and assessing material impacts, risks and opportunities related to resource use and the circular economy (ESRS 2 IRO-1)

(ESRS 2 IRO-1: 11 a-11 b)

Tubacex identifies IROs in accordance with the European Sustainability Reporting Standard on resource use and circular economy, following the LEAP methodology referenced in ESRS 2 IRO-1 of the CSRD. The analysis has focused exclusively on Tubacex's own assets and activities, as the information available on value chain actors remains limited. Therefore, at this stage it has not been possible to include the identification or assessment of physical risks associated with the supply chain. It is envisaged that this scope will be progressively expanded in future reporting periods as more complete and homogeneous data become available.

Scope:

The scope of the identification and assessment of physical risks has been defined based on the previously conducted materiality analysis, covering the selected facilities and considering all business specificities, as well as their interrelation with the different types of risks and opportunities. The materiality of risks has been determined based on variables such as total revenue, consumption of raw materials and consumables, production volumes and waste generation.

Methodology applied:

The methodology used for the analysis of risks and opportunities in this area is based on the assessment of the organisation's mass flow, i.e. input resources (raw materials, consumables and packaging) and output resources (products, secondary materials and waste).

Determination of priority:
The prioritisation of risks and opportunities in this area has been carried out considering the following criteria:

- Risks (physical and transition): Risk assessment is conducted using the formula Probability of occurrence (past and future) × Impact (inherent or residual). Impact is characterised taking into account economic, organisational, reputational and environmental impacts. As a result of combining these variables, the identified risks are prioritised and classified into four levels: low, medium, high and very high. Risk is assessed both on an inherent basis (without considering risk mitigation measures) and on a residual basis (considering implemented and/or planned mitigation measures).

- Opportunities: The assessment of opportunities considers the formula "Potential to leverage the opportunity" × "Effectiveness of the opportunity", subsequently classifying them into four levels of prioritisation: low, medium, high and very high.

Characterisation of risks:

Furthermore, the characterisation of physical risks associated with the circular economy has been carried out as follows:

- **Resource security:** Refers to the availability of and access to natural resources necessary for production. In the context of the Circular Economy, this involves ensuring a sustainable and efficient supply of materials, minimising the depletion of non-renewable resources.

- **Environmental externality of waste management:** Refers to the environmental effects resulting from waste management, recovery and disposal. In the context of the Circular Economy, this involves identifying and mitigating environmental impacts.

- **Cross-cutting physical risks:** These are risks encompassing potential physical impacts that may affect business operations, such as access to water resources and climate change. In the context of the Circular Economy, this involves adopting resilience and adaptation strategies to environmental and climate changes.

In the case of transition risks, risks have been identified related to current and emerging regulation, risks associated with technological improvements or innovations supporting the transition, changing market dynamics, as well as changes in societal perception regarding (actual or perceived) impacts on nature resulting from resource use.

Characterisation of opportunities:
In the analysis of opportunities related to the circular economy, several key areas have been identified:

- Efficiency opportunities focus on optimising resource use in production processes, equipment and transport.
- Market opportunities enable access to new niches and types of assets aligned with lower environmental impact models.
- In terms of financing, opportunities include access to green funds, bonds or loans that support circular initiatives.
- Resilience provides opportunities through the development of circular economy programmes, resource diversification, investment in green infrastructure, nature-based solutions and recycling and circularity mechanisms.
- Finally, reputational opportunities arise from more positive engagement with stakeholders through proactive management of environmental risks.

Time horizons:

With regard to the time horizons over which physical risks are likely to occur, their main impacts are expected to take place in the future. Therefore, they have been aligned with those of physical risks derived from climate change, with the following time horizons:

- Short term: 2020–2039 (up to 2040 in certain sources).
- Medium term: 2040–2059 (up to 2060 in certain sources).
- Long term: 2060–2099 (up to 2100 in certain sources).

With respect to transition risks and opportunities, the time scales are:

- Short term: 2025–2030
- Medium term: 2031–2040
- Long term: 2041–2050

Assumptions and sources of information:

For the identification and assessment of physical risks, various sources of information have been reviewed, such as:

- Specific plan for improvements in Tubacex's scrap contribution.
- Ecoinvent 3.10 database (European environmental prices) under the ReCiPe 2016 (H) assessment method of the SimaPro 9.6 programme.
- Law 7/2022 on waste and contaminated soils, Annex II Optimal final waste management.
- Improvement of scrap and waste management Kriteus II. Eco-innovation. IHOBE, Public Environmental Management Company of the Basque Country.
- Statista (2023). Global mine production of chromium, molybdenum and nickel from 2010 to 2023.
- Nickel Institute (n.d.). About nickel, its applications and lifecycle management.

- U.S. Geological Survey (2024). Mineral Commodity Summaries 2024: Molybdenum. U.S. Department of the Interior.

Tubacex has developed the IRO analysis with the support of expert personnel in the field, thereby ensuring the application of reference methodologies. Notwithstanding this, the Company acknowledges that effective consultations on resource use and the circular economy are relevant to strengthening transparency and ensuring that resource and circular economy management is carried out in a collaborative and inclusive manner. Therefore, in future reporting periods, the possibility of incorporating such actions will be assessed.

The priority risks and opportunities are set out below:

Physical risks	Impact
Dependence on and availability of critical raw materials Type of risk**:** Resource security	An eventual shortage of critical raw materials would directly impact the availability of key raw materials for the process, affecting delivery times, production costs and the ability to meet customers' technical specifications. On the other hand, high-quality scrap is becoming increasingly difficult to obtain. The global market is restricted in volume in the face of growing demand, especially in Europe and the USA. By not having premium scrap, process efficiency is reduced and alloys and operating costs increase.
Environmental Impact of Key Operations Type of risk**:** environmental externality of waste management	The organization's key operations have a significant environmental impact, especially those associated with the generation and management of waste with the greatest polluting potential. This type of activity contributes significantly to categories such as climate change, derived from greenhouse gas emissions that can promote global warming. Together, these impacts underscore the need for responsible management and mitigation measures that reduce the environmental footprint of the most relevant processes.
Transition risks	**Impact**
Empowering consumers for the green transition Type of risk: emerging regulations	The emerging regulatory framework on empowering consumers for the green transition requires that any environmental claim be scientific, verifiable by a third party and supported by life cycle assessments.
Geopolitical Risks in the Supply of Raw Materials and Consumables Type of risk: market	Geopolitical risk in the supply of raw materials comes from the strong geographical concentration of key resources, which can lead to supply chain disruptions due to political tensions, trade changes or export restrictions. This dependence can raise costs due to temporary shortages and affect Tubacex's ability to guarantee supply to its customers.
Opportunities	**Impact**
Increased transparency of environmental practices and policies arising from the disclosure obligations of the CSRD Directive. Opportunity Type: Reputational	The increasing requirements in the framework of CSRD disclosures demand more transparency in the management of critical resources such as water, as well as in information collection processes.
Improving waste management Opportunity Type: Efficiency	Slag contains high-value elements in the form of oxides or metals. TUBACEX has the opportunity to improve the management of this waste either through the search for alternative technologies in valuation to the current one, or cost reduction with possible local managers.

	On the other hand, refractories are a relevant waste. The opportunity lies in the potential for recovery through recycling or direct reuse, reprocessing or technological innovations.
Increased recycled raw material content Opportunity Type: Resilience	By increasing the proportion of recycled materials in its products, TUBACEX will reduce its dependence on virgin raw materials and improve its operational efficiency and competitiveness in the market. The opportunity lies in increasing this percentage, through the strengthening of relations with the supply chain.

Table 50: Risks and opportunities related to resource use and the circular economy

For more detailed information on impacts, risks and opportunities, their relationship with the value chain and Tubacex's strategy, please refer to Table 14 in section 1.3.3 of this report, as well as Table 2 in Annex II: Detail of material impacts, risks and opportunities.

2.4.2 Policies related to resource use and the circular economy (E5-1)

(E5-1: 14-15 a-15 b-16)

Commitments related to resource use and the circular economy are set out in the General Sustainability Policy and in the Environmental and Climate Action Policy. These policies are described in greater detail —including their main contents and objectives— in Annex III: Corporate policies.

In particular, the Environmental and Climate Action Policy includes among its objectives the establishment of a framework for the promotion of the circular economy and the comprehensive utilisation of the entire production process. In this regard, it establishes the following commitments associated with the identified material impacts, risks and opportunities (IROs):

IRO material	Associated commitment
• **Depletion of material resources** • **Minimization of the use of resources by favouring the use of recycled materials** • **Impact on the supply chain for the incorporation of efficiency and recyclability criteria of materials.** • **Promotion of their recovery and recycling operations (slag, refractories, etc.).**	• Promote circularity by increasing the use of recycled materials as far as possible, as well as through the reuse, recovery and recycling of waste at all stages of its value chain. This approach contributes to reducing dependence on virgin resources, promoting the use of secondary materials wherever feasible. • Adopt the necessary measures to improve efficiency in the use of raw and auxiliary materials, as well as for the conservation of available natural resources.
• **Alteration of soil quality resulting from the incorrect storage of hazardous waste.** • **Change in land use due to occupation derived from waste generation: landfills, etc.** • **Reduction of waste deposit and/or disposal operations in landfills.** • **Promotion of their recovery and recycling operations (slag, refractories, etc.).**	• Minimise the generation of waste, implementing measures that prevent its generation at source. • Application of measures to protect and prevent soil contamination through proper management of hazardous products and waste.

Table 51: Relationship between IROs related to resource use and the circular economy and associated commitments

In conclusion, the commitments undertaken by Tubacex reflect a proactive approach towards the transition to a more efficient and circular economic model, based on the principles of reduce, reuse and recycle.

2.4.3 Actions and resources related to resource use and the circular economy (E5-2)

(ESRS 2: 68 d-69 a-69 b. E5-2: 19)

Mitigating the risks arising from limited access to and the increasing cost of raw materials is essential, both to ensure operational continuity and to comply with increasingly stringent regulations on waste management and sustainability. To this end, Tubacex is progressing in the implementation of levers aimed at waste prevention, the recovery of by-products and the improvement of control over material flows, with the objective of reducing the environmental impact associated with waste generation and advancing towards a more circular model.

The Group has prioritised the development of recovery and reuse initiatives, particularly in relation to complex industrial waste. Notable projects currently under analysis include those aimed at the recovery of slag through innovative processes, enabling its reuse in external applications such as the asphalt or concrete industries, as well as projects for the recovery and reuse of spent acid baths, with the potential to significantly reduce the generation of hazardous waste and the consumption of raw materials.

In addition, Tubacex has implemented operational measures aimed at source reduction and the optimisation of waste management, including the internalisation of recovery processes, the extension of the useful life of industrial emulsions, the replacement of single-use materials with reusable alternatives, and the use of recycled or metal pallets in production processes.

Furthermore, the Group strengthens the control and traceability of waste flows through monitoring and management systems, as well as awareness-raising actions aimed at employees to improve waste separation and proper waste management, contributing to greater efficiency in the management of municipal and industrial waste.

These actions reflect an approach focused on the prevention, reuse and recovery of waste, supported by selective investments and continuous process improvement, reinforcing the robustness and credibility of the sustainability reporting system and its alignment with the principles of the circular economy.

In the subsequent section, relating to targets associated with the circular economy, the projects carried out in this area are listed and the actions undertaken for each project are detailed. In this regard, it should be noted that no actions have been implemented to establish remedial measures for individuals adversely affected by material actual impacts, as no cases requiring direct intervention have been recorded.

During the 2024 financial year, economic resources allocated to resource use and the circular economy amounted to €2,000 in CapEx and €1,658,900 in OpEx, mainly linked to operational improvement actions and key waste management. These items are integrated into the ordinary management of the business and do not correspond to structural or extraordinary investments.

No material recurring operational impacts associated with these initiatives have been identified, nor significant costs or savings requiring separate monitoring.

In the 2025 financial year, actions related to this matter continue to be integrated into general operating budgets and regular investment plans, and no specific CapEx or OpEx items of a material nature have been identified that would justify their quantitative breakdown.

In application of the principle of proportionality and materiality, the Company considers that individualised financial information for 2025 is not material for an adequate understanding of its performance in relation to resource use and the circular economy.

2.4.4 Targets related to resource use and the circular economy (E5-3)

(ESRS 2: 75-77 a-77 b- 80 a-80 b-80 c-80 d-80 e-80 j-80 i-80 f-. E5-3: 23-24-25- 27-40)

Within the framework of the Tubacex ESG Plan, the Company has established ambitious targets to advance its contribution to the circular economy, committing to achieve more than 95% waste circularity by the 2030 financial year.

These targets focus on improving the efficiency of manufacturing processes and their circularity, through the incorporation of recycled materials and waste recovery. Aspects related to product circularity or eco-design are not applicable, due to the characteristics and nature of the product manufactured.

To this end, Tubacex has planned the following actions and projects:

PILLAR 1: Circularity and neutrality

Action: Scrap metal recovery model project
Target to be achieved and relationship with policies: Achieve a use of 75% of recycled materials. (Absolute target) **Scope of action**: Group and external clients. **Baseline**: 58% recycled materials **Base year**: 2019. **Time horizon**: 2030.

Actions / Initiatives	**Parameter to be measured and definition** *(DP 75)*	**Significant methodologies and hypotheses**	**Validation**	**Performance against target**
- Improved input mix - Improvement of the evaluation model for recycled input materials, consisting of scrap metal, ferroalloys and other metal products)	% recycled input materials.	Quantity of materials of recycled origin/ Quantity of total materials used Limitations to the calculation derived from the estimates made to obtain it in accordance with Table 2 of Section 1.1.2.2. of this report.	Supplier	**2025:** A consolidated total of 70.75% recycled input materials was achieved, compared to 72.37% in the previous year (2024). The trend is in line with expectations, and this target is expected to be achieved within the established time horizon.

Action: Slag and refractory waste recovery project

Target to be achieved and relationship with policies: Promotion of a model for the recovery and revaluation of the main waste from the steel mill. To achieve recycling of 95% of the waste generated. (Absolute target)

Scope of action: Group and external clients.

Reference value: 60.5% recycled/revalued waste.

Base year: 2019.

Time horizon: 2030.

Actions / Initiatives	Parameter to be measured and definition	Significant methodologies and hypotheses	Validation	Performance against target
- Revaluation of the steel mill's slag by sending it to a management entity in Germany to recover 2% of the mineral and use the rest as road asphalt.	% recovered or revalorised waste.	Quantity of waste sent for recovery or revalorisation / Total quantity of waste generated. Waste sent for recovery or revalorisation is determined based on recovery or disposal operations recorded and documented by authorised waste managers.	Tubacex	**2024:** The percentage of waste recycled or revalorised reached 82.3%, reflecting a significant improvement compared to the base year and moving closer to the 95% target. **2025:** During this year, a total of 14,000 tonnes of this waste were sent for recovery. The percentage of waste recycled or revalorised reached 82.2%, remaining similar to the previous financial year. The trend is as expected. \n\n100% of steel plant slag is revalorised through a German waste manager.

Action: Project for the minimisation and recovery of waste generated.
Target to be achieved and relationship with policies: Achieve recycling of 95% of the waste generated. (Absolute target) **Scope of action**: Group. **Reference value**: 60.5% recycled/revalued waste. **Base year**: 2019. **Time horizon**: 2030.

Actions / Initiatives	**Parameter to be measured and definition**	**Significant methodologies and hypotheses**	**Validation**	**Performance against target**
Measures have been implemented to optimise processes to minimise waste generation and to promote the use of recycled materials, such as: - Extending the useful life of certain waste materials - Internalization of the waste recovery process to improve the control of waste management and maximize its recovery within the facilities. - Promotion of the use of reused and recycled materials in logistics processes, contributing to the reduction of the consumption of virgin resources and the minimisation of waste generation. Currently fully implemented in Spanish plants. In the process of being extended to the rest of the group's plants.	% recycled waste.	Quantity of waste destined for recycling / Total quantity of waste generated. Waste destined for recovery or revaluation is determined based on recovery or disposal operations recorded and documented by authorised managers.	Tubacex	**2024:** The percentage of waste recycled or revalorised reached 82.3%, reflecting a significant improvement compared to the base year and moving closer to the 95% target. **2025:** The percentage of waste recycled or revalorised reached 82.2%, remaining similar to the previous financial year. The trend is as expected.

Table 2: Actions and targets associated with resource use and circular economy

Targets and parameters are reviewed annually to verify whether they remain relevant. In 2025, there have been no significant changes in the Company's performance in achieving any of the targets.

These targets are aligned with the commitments set out in the comprehensive Environmental Policy and the Sustainability Policy, and are primarily focused on:

- Promoting circularity by increasing, as far as possible, the use of recycled materials and encouraging the reuse, recovery and recycling of waste throughout the value chain.
- Minimising, as far as possible, the generation of all types of waste, avoiding its generation at source.
- Adopting the necessary measures to improve the efficiency of the use of raw and auxiliary materials.
- Promoting collaboration with universities, technology centres and customers to advance circular and low-carbon solutions.

In terms of circularity, the targets established are structured around two complementary areas: the reduction of waste generated (outputs) and the increase in the proportion of recycled materials used in production processes (inputs).

Specifically, the organisation has set targets to achieve 95% recycled waste and to ensure that 75% of input materials come from recycled resources. It should be noted that scrap —the main raw material in the process— is 100% recycled, contributing decisively to the achievement of the target relating to the use of secondary materials. Furthermore, as previously indicated, the main non-hazardous waste generated —slag— is subject to a recovery process that enables the recovery of minerals and the recycling of the waste itself, significantly reducing the volume sent to landfill and, consequently, the associated impacts on landscapes and ecosystems.

For the establishment of the aforementioned targets, no requirements imposed by applicable regulations or local ecological thresholds have been taken into account, as neither situation is applicable to the type of resources or waste associated with them; therefore, the targets set are voluntary. Nevertheless, Tubacex has other targets related to the minimisation of hazardous waste generation and packaging waste, as required by applicable European regulations on waste and packaging. However, given that the volume of this type of waste is significantly lower, its contribution to promoting the circular economy is more limited compared to other categories of waste generated by the Company, which are those for which the most ambitious targets associated with the ESG Plan have been established and set out above.

2.4.5 Resource inflows (E5-4)

(E5-4: 30-31 a-31 b-31 c-32-35-AR25-AR26)

For the analysis of impacts, risks and opportunities in the Resource Use and Circular Economy area, a mass flow inventory has been obtained for each operational site, identifying input raw materials and output resources (secondary materials, waste and products). This analysis makes it possible to contextualise Tubacex's operations by identifying the most significant material flows at each location. Input resources comprise all material products and packaging used in the Company's own operations. The information collected includes the type of material, quantity, supplier and geographical location of the supplier, among other parameters, in order to assess their importance in Tubacex's production processes.

To this end, Tubacex calculates resource inflows based on purchases made. Although this figure does not directly correspond to inputs into the manufacturing system, it constitutes a reliable estimate and serves as an indicator of overall inputs to the entity. As it is based on purchases, there is no overlap between the categories of reused and recycled waste, thereby avoiding the risk of double counting.

During 2025, Tubacex did not use technical or biological materials in its production processes.

In the manufacture of products and services, Tubacex uses reused or recycled components and materials. The main reused material is scrap, which is used for steel production and constitutes the final product. With regard to packaging, materials such as wood, metal strapping and plastic are reused or recycled.

Of the total 166,959 tonnes of materials purchased in 2024, 140,035 tonnes corresponded to raw materials (scrap, ferroalloys and metal products), of which 72.4% originated from recycled sources.

In 2025, total material purchases amounted to 145,615 tonnes, of which 117,770 tonnes corresponded to raw materials. Of this volume, 72.01% originated from recycled sources.

2.4.6 Resource outflows (E5-5)

(E5-5: 35-36 a-36 b-36 c-38 a-38 b-40-37 a-37 b-37 c-39)

C As a company dedicated to the manufacture of seamless stainless steel and high-quality nickel alloy solutions, Tubacex's products are designed according to rigorous criteria of durability and resistance, particularly to meet the demands of industries operating under extreme conditions. The main aspects ensuring their performance in environments of high pressure, severe corrosion and elevated temperatures are detailed below:

- **Corrosion resistance.** Stainless steel tubes and nickel alloys are specifically designed to resist corrosion, even in the most aggressive environments. Nickel alloys are highly resistant to oxidation and corrosion in acidic and alkaline media, making them ideal materials for applications in the chemical, petrochemical and energy industries.

- **High pressure resistance.** Our tubes are designed to withstand extremely high pressures without compromising their structural integrity. Seamless manufacturing is a key factor, as it eliminates potential weaknesses associated with welding, ensuring uniform strength לאורך the entire length of the tube. Stainless steel tubes and nickel alloys are formulated with a combination of mechanical properties that enable them to withstand stresses and deformations, making them ideal for applications in high-pressure piping systems, such as in the energy and mobility industries.

- **Resistance to extreme temperatures.** Both stainless steel and nickel alloys have excellent resistance to high temperatures. Stainless steel maintains its mechanical strength and structural stability even at elevated temperatures. Nickel alloys, on the other hand, can withstand even higher temperatures without deforming or losing their mechanical properties.

The estimation of the durability of stainless steel products may vary depending on the type of product, its intended use and the conditions in which it is used. However, in general terms, the stainless steel industry typically relies on certain guidelines that help estimate the durability of stainless steel tubes. The type of alloy or conditions of use may determine product lifespan, which can range between 15 and 50 years, in line with the industry average. It should be noted that, at the end of its useful life, this product can be reintroduced into the manufacturing process as a raw material indefinitely without losing its quality or properties, as it is 100% recyclable.

When a stainless steel tube reaches the end of its useful life, it can be melted down and reintegrated into the production process to manufacture new products. This closed-loop cycle reduces the need to extract additional natural resources, thereby decreasing the environmental impact of mining and the exploitation of virgin materials. In addition to product circularity, Tubacex has a group company, NTS Amega, specialised in the design, manufacture and repair of products, particularly in the field of high-engineering industries. Its product and service offering includes the repair of a variety of equipment and components, providing high-quality technical services to extend product life. Some of the main repair services provided include:

1. **Repair of high-technology components:** NTS Amega specialises in the repair of industrial parts and equipment, such as valves, pumps, heat exchangers and other critical components requiring precision and advanced technical expertise.

2. **Restoration of industrial equipment:** The company offers restoration of equipment that no longer operates efficiently or has suffered wear due to operational demands. This includes detailed inspection, diagnosis and repair to restore equipment to optimal functional condition.

3. **Repair of special alloys:** While the company focuses on products made from stainless steel and nickel alloys, it also carries out repairs on these materials, restoring their capacity to operate in environments of high temperature, pressure and corrosion.

4. **Preventive maintenance services:** In addition to specific repairs, NTS Amega offers preventive maintenance services to avoid future failures and extend the useful life of equipment and systems, thereby ensuring proper operation and reliability in industries requiring continuous performance.

The Group generates a wide variety of waste as a result of its steelmaking, metallurgical and machining activities, with a significant presence of both hazardous and non-hazardous streams.

Among the most relevant non-hazardous waste, due to their volume and significance, are non-hazardous metal wastes — such as shavings, offcuts, grinding dust and slag— which have high recycling potential and are commonly reintegrated into production cycles. Others, such as refractory materials, packaging, wood and various liquid effluents, are appropriately treated, prioritising reduction, reuse and recycling, in order to minimise their environmental impact and optimise resource use.

With regard to hazardous waste, the most relevant include used oils, pickling sludge, emulsions and solvents, which require specialised management to prevent environmental impacts and ensure regulatory compliance. Another relevant stream consists of absorbents and contaminated materials, mainly cloths used in machining operations.

Among spent industrial liquids are nitric acid, cutting fluids and alkaline degreasing agents. Spent nitric acid originates from cleaning and passivation processes, containing nitrates and degraded acidic compounds. Spent cutting fluid is a residual emulsion composed of mineral oils, water and additives such as biocides and emulsifiers, generated during machining. Spent alkaline degreasing agents contain hydroxides, surfactants and dissolved contaminants resulting from the cleaning of metal parts.

On the other hand, ferrous metals represent the metallic waste generated during cutting, forming and machining operations. These consist mainly of shavings, offcuts and ferrous material residues, and are largely recoverable through recycling. These materials require specific treatment to maximise their reuse and minimise environmental impact. Overall, these wastes, both liquid and solid, constitute key streams for the sector due to their relevance in production processes and the need for proper management that promotes sustainability.

In addition, these wastes include slag and refractory materials used in smelting and heat treatment processes, which contain mineral and metallic compounds that can be recovered or appropriately disposed of.

The calculation of waste generated is carried out through the aggregation of official waste management records at each plant, measured directly. This approach ensures that each waste stream generated at the different facilities is taken into account. Furthermore, the method of waste disposal is determined based on the applicable local regulations at each plant and the specific nature of the waste generated, ensuring that current protocols and regulations for its treatment and disposal are followed. In this way, appropriate management of waste generated in each industrial process is ensured in compliance with legislation.

The quantities of waste generated, both hazardous and non-hazardous, according to the recovery operations carried out, are set out below:

	2024	2025
TOTAL AMOUNT OF WASTE GENERATED (ton)	**72,072.37**	**72,627.00**
Total amount of hazardous waste generated (ton)	**8,899**	**8,111**
Total amount of hazardous waste recovered (ton)	**2,976**	**2,915**
Total amount of hazardous waste destined for preparation for reuse (ton)	-	-
Total amount of hazardous waste destined for recycling (ton)	1,652	1,559
Total amount of hazardous waste destined for other recovery operations (ton)	1,324	1,356
Total amount of hazardous waste disposed of (ton)	**5,923**	**5,196**
Total amount of hazardous waste disposed of by incineration (ton)	13	17
Total amount of hazardous waste disposed of in landfill (ton)	4,763	4,296
Total amount of hazardous waste destined for other disposal operations (ton)	1,147	883
Total amount of radioactive waste (ton)	-	-

	2024	2025
TOTAL AMOUNT OF WASTE GENERATED (ton)	**72,072.37**	**72,627.00**
Total amount of non-hazardous waste generated (ton)	**63,173**	**64,516**
Total amount of non-hazardous waste recovered (ton)	**56,354**	**56,786**
Total amount of non-hazardous waste destined for preparation for reuse (ton)	3,482	2,664
Total amount of non-hazardous waste destined for recycling (ton)	52,872	54,122
Total amount of non-hazardous waste destined for other recovery operations (ton)	-	-
Total amount of non-hazardous waste disposed of (ton)	**6,819**	**7,730**
Total amount of non-hazardous waste disposed of by incineration (ton)	78	99
Total amount of non-hazardous waste disposed of in landfill (ton)	1,709	1,656
Total amount of non-hazardous waste destined for other disposal operations (ton)	5,032	5,975
Total amount of non-recycled waste (ton)	**12,742**	**12,926**
Percentage of non-recycled waste (%)	**17.7%**	**17.8%**

Table 53: Waste generate.

With regard to packaging materials, in 2024 Tubacex used a total of 1,030.56 tonnes, of which 36.33 tonnes (3.5%) corresponded to recycled materials. In 2025, the total volume of packaging materials amounted to 1,394.093 tonnes, including 44.67 tonnes of recycled content (3.20%).

It should be noted that the main packaging material used is wood, which accounted for 952 tonnes in 2024 and 1,245 tonnes in 2025. The wood used is suitable for reuse after its initial use, contributing to the optimisation of the material's life cycle and to the reduction of the environmental impact associated with packaging.

The Group generates a wide variety of waste as a result of its steelmaking, metallurgical and machining activities, with a significant presence of both hazardous and non-hazardous streams. Among the most relevant non-hazardous waste, due to their volume and significance, are non-hazardous metal wastes —such as shavings, offcuts, grinding dust and slag— which have high recycling potential and are commonly reintegrated into production cycles. Others, such as refractory materials, packaging, wood and various liquid effluents, are appropriately treated, prioritising reduction, reuse and recycling, in order to minimise their environmental impact and optimise resource use.

With regard to hazardous waste, the most relevant include used oils, pickling sludge, emulsions and solvents, which require specialised management to prevent environmental impacts and ensure regulatory compliance. Another relevant stream consists of absorbents and contaminated materials, mainly cloths used in machining operations.

2.4.7 Anticipated financial effects of impacts, risks and opportunities related to resource use and the circular economy (E5-6)

(E5-6)

In compliance with the transitional provisions set out in requirement 10.4 of ESRS 1 and Appendix C, as well as the delegated act known as the "Quick Fix", Tubacex avails itself of the option to omit the information required in this section.

3. Social Information

3.1 Own workforce (S1)

3.1.1 Material impacts, risks and opportunities and their interaction with the strategy and business model (SBM-3)

(ESRS 2 SBM-2:12-SBM-3: 11-14a-14b-14c-14d-14e-14fi-14fgi-ii-14-15-16)

Tubacex is a global group committed to the well-being and protection of its employees, who play a key role in achieving its strategic objectives and driving its business project. The Company promotes safe working environments, fosters the attraction and development of talent, and is committed to equality and inclusion. Tubacex recognises and values all its professionals, as well as their representatives, their families and other associated groups. With a multicultural and diverse workforce, it operates under a shared purpose: to grow the Company and generate sustainable value.

In order to meet employee expectations and ensure their satisfaction, it maintains open and continuous communication through channels such as experience surveys, perception surveys based on the EFQM model, suggestion boxes, key forums and continuous training spaces. These mechanisms enable the collection of feedback, the identification of areas for improvement and the fostering of a culture of collaboration and mutual growth, and serve to align operations and strategic processes with employee expectations.

Occupational Health and Safety	Occupational health and safety constitutes an absolute priority and a fundamental strategic line for Tubacex. The Company operates in a safe and responsible manner, placing the protection of human life as its primary consideration. Given the industrial nature of its operations, there are inherent risks that are managed through a preventive culture and the continuous reduction of operational risks, through investments in advanced technology and the digitalisation of production processes. These actions not only ensure the well-being of employees, but also reinforce the Company's commitment to continuous improvement in this area.
Attraction and Retention of Talent	The attraction and retention of professionals is an essential element in ensuring the execution of projects and the progress of the strategic plan. As a flexible and proactive organisation, Tubacex adapts its policies to new trends in talent management, promoting professional development, communication and the active participation of its employees. Aware that the lack of key personnel may compromise the achievement of strategic objectives, the Group focuses its efforts on attracting, retaining and developing high-impact profiles, thereby mitigating this risk and strengthening its capacity to achieve its goals.
Equality and Diversity	In 2022, diversity, equity and inclusion were incorporated into the Group's ESG risk map, recognising their strategic relevance and their impact on the long-term sustainability of the organisation. In 2023, these aspects remained a priority in the materiality analysis and were formalised with the launch of the Equality, Diversity and Inclusion Policy, establishing a formal framework for promoting equal treatment and opportunities within the Group. Building on the experience gained and the evolution of the regulatory and organisational context, in 2025 Tubacex reviewed and updated this policy, approving the new Equal Opportunities, Non-Discrimination and Inclusion Policy, which reinforces and consolidates the commitments undertaken. This progressive approach contributes to greater internal cohesion, the professional development of employees and the sustainable development of the Group, in line with its corporate objectives and best ESG practices.
Human Rights	Tubacex maintains a firm commitment to the promotion and respect of human rights, ensuring the dignity, equality and freedom of its employees in all regions in which it operates. This commitment was incorporated into the sustainability risk map in 2022 and was reviewed in 2023 to ensure that all plants shared these values. In 2024, the analysis of potentially affected human rights was expanded according to activity and location, identifying management measures aimed at mitigating potential impacts. In 2025, progress has been made in the implementation of an integrated due diligence process to address these risks effectively, in line with what is described later in section 3.1.2 (S1-1).

Table 54: Key aspects in the management of the Group's workforce

Material IROs related to own workforce are disclosed in section SBM-3 of this sustainability report (or annex). These impacts, risks and opportunities are related to working conditions, equal treatment and opportunities, as well as other labour rights, applicable to all employees, both own workforce and subcontracted personnel.

The negative impacts identified largely respond to global trends that are not exclusive to the Company: high staff turnover in certain regions, difficulty in attracting and retaining specialised talent, and challenges related to Occupational Health and Safety, arising from the inherent risks of industrial operations. In certain workplaces, the use of subcontracted personnel through Temporary Employment Agencies (ETTs), such as in India (Tubacex Tubes and Pipes) and Thailand (Awaji Thailand), responds to a need for operational flexibility. This practice seeks to minimise the impact of high turnover, enabling a structured transition of workers to the permanent workforce once the employment relationship has been consolidated.

To mitigate these impacts, Tubacex implements policies on well-being, continuous training and professional development, ensuring that all workers, whether employed or subcontracted, operate under principles of equality, safety and respect.

In addition, the Group has identified positive impacts arising from various activities implemented in the labour sphere, including continuous training, flexible work organisation, work-life balance initiatives and the implementation of Occupational Health and Safety systems across all plants. These actions have contributed to improving professional development, job stability, well-being and employee satisfaction, creating safer, more inclusive and people-oriented working environments. These positive impacts benefit both employed and non-employed personnel providing services at the Group's facilities and are observed across the different geographies in which Tubacex operates.

The analysis carried out has not identified any material adverse impacts on the own workforce arising from the Group's transition plans. The initiatives associated with these plans are being implemented progressively and in a manner compatible with maintaining appropriate working conditions, without negatively affecting employment, safety and health, or the labour rights of employees.

The systemic human rights analysis carried out in 2024 made it possible to assess risks by activity and geography. From an operational perspective, transport activities were identified globally as presenting a higher potential risk of human trafficking and forced labour, particularly for women, children and migrant workers. Although no specific cases were detected among the Group's logistics suppliers, Tubacex remains committed to strengthening monitoring in this area.

In the remaining activities analysed, according to reference sources, no systemic risks associated with forced labour or child labour have been identified.

At a geographical level, the analysis showed very high risk levels in Saudi Arabia, the United Arab Emirates and Kazakhstan; high levels in India; and moderate levels in Thailand, Brazil and Guyana, with low levels in the rest of the countries where the Group operates. For child labour, a moderate risk was identified in Brazil and a lack of direct data in countries such as Guyana, Saudi Arabia, the UAE, Kazakhstan, India, Thailand, Singapore and China; however, other international human rights indices point to the need for enhanced monitoring in this area. In the remaining geographies where the Group's companies operate, low levels of risk associated with both forced labour and child labour have been identified.

All own workforce who could be significantly affected by the Company are included within the scope of this disclosure.

During 2025, Tubacex has continued to advance its due diligence model, consolidating internal training on human rights and deploying a multi-year action plan derived from the project initiated in 2024. Key initiatives include the review of core corporate policies —including Human Rights, Sustainability, Health and Safety, Environment and Social Action, Diversity and Inclusion, Training and Social Action— and the strengthening of the internal system for identifying and prioritising risks. In parallel, progress has been made in equality initiatives, including a gender diversity assessment and the promotion of female leadership, as well as a specific focus on the integration of persons with disabilities to ensure an accessible, inclusive and professionally oriented working environment.

Through these actions, Tubacex reaffirms its commitment to responsible, ethical and sustainable management, fully integrating the perspective of people and human rights across all its global operations.

There are no material risks or opportunities arising from impacts on people within its own workforce that relate to specific groups of individuals.

For more detailed information on impacts, risks and opportunities, their relationship with the value chain and Tubacex's strategy, please refer to Table 14 in section 1.3.3 of this report, as well as Table 2 in Annex II: Detail of material impacts, risks and opportunities.

3.1.2 Policies related to own workforce (S1-1)

(ESRS 2 65a-65b-65c. S1-1: 19-20a-20b-20c-21-23-24a-24b-24c-24d)

Tubacex has a comprehensive framework of policies that guide the management and development of its own workforce, as well as the protection of Human Rights. Further details can be found in Annex III of this report, where their approving bodies, dates and specific commitments are set out. A summary of the main policies related to own workforce is provided below:

- **Equal Opportunities, Non-Discrimination and Inclusion Policy.** Reinforces the Company's commitment to full equality of treatment and opportunities, both in internal relationships among members of the organisation and in its relations with third parties, preventing and eradicating any form of direct or indirect discrimination.
- **Training and Development Policy.** Provides a framework for own workforce to develop their knowledge and acquire new skills in a competitive environment.
- **Occupational Health and Safety Policy.** Applicable both to own workforce and to individuals carrying out activities under the Company's supervision.
- **Human Rights Policy.** Represents the commitment of Tubacex and all its employees to develop an organisational culture that implements a policy supporting internationally recognised human rights.
- **Sustainability Policy.** Includes among its commitments compliance with Human Rights. To this end, the Company relies on international instruments to detect, monitor, prevent, mitigate, remedy or put an end to potential impacts that its activities or related activities may have in this area.
- **Code of Conduct.** In its latest revision, approved by the Board of Directors, it establishes the obligations of the Company —including the Chairman, Chief Executive Officer and other members of the Board of Directors, the Secretary (non-member) and all Tubacex collaborators— to: provide an environment in which equal opportunities apply to all; ensure the absence of any type of discrimination; foster a working environment that promotes dignity and respect, rejecting any manifestation of violence, abuse of authority and intimidation, with particular sensitivity towards less represented or more disadvantaged groups; and always be guided by fundamental principles reflected in the Universal Declaration of Human Rights, among others.

These policies are deployed across business units, which incorporate them into their management procedures and assume the commitments defined therein. Consistently, the sustainability plan translates these commitments into concrete objectives and specific targets, shared with the different business units, which actively participate in their achievement.

Tubacex recognises the fundamental importance of respecting Human Rights, including labour rights, of all individuals within its workforce. Its commitment is reflected in the Human Rights Policy, which is explicitly aligned with the Ten Principles on Human Rights, Labour, Environment and Anti-Corruption, the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the Fundamental Principles and Rights at Work of the International Labour Organization (ILO).

In line with this framework, Tubacex establishes the general commitment to avoid causing or contributing to adverse Human Rights impacts through its own activities and, in turn, promotes clear commitments in key areas such as:

1. Non-discrimination and equal opportunities
2. Prohibition of forced labour and child labour
3. Elimination of inhumane or degrading treatment and harassment
4. Freedom of association and collective bargaining
5. Health and safety at work
6. Respect for diversity and non-discrimination

In addition, the Policy includes Tubacex's commitment to the identification, mitigation and remediation of any situation that may pose a risk in relation to Human Rights.

In line with the due diligence model described in previous sections, further progress was made during 2025 in its development, focusing on the identification, prevention and accountability for adverse impacts of business activities. This process has been structured around international reference frameworks (UN, OECD and ILO) and the approach proposed by the CSDDD.

Tubacex's approach to communication and employee engagement is based on evaluation and active listening, with the aim of guiding management and continuously improving the employee experience.

In 2023, Tubacex launched for the first time the Employee Experience Survey as a key tool to understand the internal perception of the workforce. In 2024, the survey was extended to 100% of the global workforce, enabling a comprehensive and consistent view of employee experience across all countries and business units of the Group.

The survey analyses, among other aspects, performance and recognition, professional development opportunities, work-life balance, remuneration and benefits, corporate culture, diversity and inclusion, engagement, personal and professional priorities and overall satisfaction with the Company. It also includes a section for open comments, allowing employees to freely express opinions, concerns and suggestions.

The results obtained are analysed in a structured and in-depth manner with the aim of identifying areas for improvement and defining specific action plans that translate into tangible changes in people management policies and practices. In 2025, Tubacex has deployed and implemented the action plans derived from the survey results, with the aim of continuously improving the different factors that influence employee experience and perception.

With the aim of continuing to advance in the management of Human Rights and working conditions, Tubacex recognises the need to consolidate a comprehensive approach to engagement and consultation with its global workforce, enabling the involvement of employees, regardless of their location or role, in key processes such as the development of corporate policies, the assessment of risks and opportunities, the design and implementation of action plans, the monitoring and evaluation of results, transparent and two-way communication, and the management of impacts and remediation measures.

The Human Rights Policy also reflects Tubacex's firm commitment to remedying any adverse impact on people's rights that may arise from its activities. In this regard, the Group is working on defining formal remediation processes, without prejudice to acting on a case-by-case basis in the meantime to address any incidents that may occur. As an initial measure, a whistleblowing channel has been implemented to enable employees and other stakeholders to report potential Human Rights violations, ensuring confidentiality, protection of the reporting person and proper investigation of each case, as well as the adoption of the corresponding measures.

Accordingly, as the Company progresses in defining and implementing these processes, or as changes in the context so require, it will work on adjusting and improving its policies to ensure that they reflect international best practices in Human Rights and labour matters, pursuing their effective implementation across all its global operations.

3.1.3 Processes for engaging with own workforce and workers' representatives on impacts (S1-2)

(S1-2: 27a-27b-27c-27d-27e-28)

In line with the engagement approach described in the previous sections, Tubacex has identified the need to establish a corporate employee engagement strategy that enables the structured integration of the perspectives of different stakeholders throughout its value chain, particularly in addressing actual and potential impacts.

Tubacex maintains continuous collaboration both directly with its workforce and through their representatives by means of various structured dialogue mechanisms. This collaboration takes place at different stages of people management processes —identification of needs, assessment of labour impacts and definition of preventive or improvement measures—. Engagement is articulated through periodic surveys, works councils, follow-up meetings, information sessions and formal consultation channels, with a regular frequency ranging from monthly to quarterly or annual depending on the type of mechanism.

These forums enable the collection of employee perspectives and ensure their integration into decision-making related to well-being, safety and working conditions. Examples of these channels include: corporate experience surveys addressed to the entire workforce, participatory meetings during work shifts focused on improvement and safety, and local participation processes established by labour regulations and health and safety standards, such as ISO 45001.

The People Management Department, together with the Operations Management at each plant, is operationally responsible for ensuring that these engagement processes are carried out and that their results are integrated into decision-making and the Company's management approach, as well as for assessing the effectiveness of collaboration with own workforce through the systematic monitoring of results obtained from the various engagement channels.

Tubacex guarantees, across all its sites, respect for labour rights established under local legislation, including freedom of association and the right to collective bargaining. Where collective agreements exist, their regulation is based on good faith negotiation between the parties, within the applicable regulatory framework and with the intention of contributing to improved competitiveness. In those entities that do not have their own collective agreement, the Group respects and, where necessary, exceeds legal requirements regarding working hours, remuneration and work organisation. Even in geographies where there is no system of collective bargaining, such as the United Arab Emirates or Saudi Arabia, Tubacex ensures working conditions that meet, and in some cases exceed, the established legal minimums.

The Company does not currently have a Global Framework Agreement on human rights. However, respect for the human and labour rights of its own workforce is explicitly set out in its Code of Conduct and its General Human Rights Policy, aligned with the fundamental principles of the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights.

Furthermore, the Group maintains sectoral and/or company-level collective agreements signed with workers' legal representatives in those jurisdictions where such social dialogue frameworks exist. These agreements regulate, among other matters, working conditions, equal treatment and opportunities, occupational health and safety, and other fundamental labour rights.

Through the established social dialogue mechanisms —including works councils, trade union representatives and health and safety committees— the organisation systematically gathers and considers the perspectives of its own workforce in relation to labour and human rights issues, integrating these considerations into the routine management of its operations.

At the same time, the Group is working to better understand the perspectives of individuals who may be particularly vulnerable when addressing actual or potential risks to their working conditions. Current analyses focus especially on women and persons with disabilities, both groups with lower representation within the workforce. In this context:

- The 2023 and 2024 (biennial) employee experience survey has placed a specific focus on gender equality issues, with the aim of strengthening the corporate diagnosis in terms of diversity and promoting the presence of women in key positions of responsibility.

- Workstreams have been developed aimed at the integration of persons with disabilities into the workforce. In the plants of Llodio and Amurrio, for example, meetings have been held with partner organisations to better understand the local reality in terms of recruitment. This commitment extends across the entire organisation and is driven by the Tubacex Foundation, the Sustainability Plan and the management commitments of business units.

3.1.4 Processes to remediate negative impacts and channels for own workforce to raise concerns (S1-3)

(S1-3: 32a-32b-32c-32d-32e-33)

Tubacex has structured processes in place to address and remedy any impact affecting its own workforce. The Group applies a systematic approach that includes the identification of the impact through specific channels, the analysis of the situation and the collection of the necessary information to fully understand the impact, as well as the development of an action plan aimed at mitigating and, where necessary, remedying it. Once the remediation process has been initiated, continuous monitoring of the actions implemented is carried out, complemented by direct feedback from the affected workforce, in order to ensure the effectiveness of the process and the level of satisfaction with the solutions adopted.

To ensure that the needs of its workforce are properly heard and addressed, the Group conducts periodic employee experience surveys, described in section 3.1.3, and has an Internal Information System, mainly comprising a Whistleblowing Channel, available to all individuals within the Group. This channel is configured as a formal and secure mechanism for communication, consultation and/or reporting of potential irregularities and breaches with criminal or administrative implications, including matters covered by the Code of Conduct and aspects related to Labour Law in the field of Health and Safety.

In addition to this Whistleblowing Channel, accessible via the corporate website and the Employee Portal, employees also have the possibility to report conduct verbally by requesting a face-to-face meeting with the person responsible for the Internal Information System or with designated external managers.

In line with the principles of transparency and accessibility, Tubacex has developed training, awareness and sensitisation activities for professionals and collaborators on the purpose and functioning of the system. These actions include a specific module on the Whistleblowing Channel, integrated into the Code of Conduct training and deployed through the e-learning platform during 2025.

Furthermore, during 2025, in-person training has been provided to those employees not yet reached by the progressive rollout of the platform. It is planned that the e-learning platform will be accessible to 100% of the workforce in 2026, thereby ensuring uniform access to information and to communication and reporting mechanisms.

The corporate policy of the Internal Information System establishes that the System Owner (Compliance Officer) manages and processes the communications received and may delegate to Compliance Officers of subsidiaries or rely on external support. The System Owner acts with autonomy and independence and has the necessary resources to ensure effective management. The system and its associated policies are accessible to the entire workforce through the Employee Portal and the corporate website.

The Internal Information System fully complies with **Law 2/2023, of 20 February, on the protection of persons who report regulatory breaches and on combating corruption**, ensuring the protection of all individuals who use it, including those acting on behalf of employees. The guarantee of protection for the reporting person is explicitly set out in the policy, with Tubacex committing to prevent any form of retaliation and to preserve the confidentiality of the reporting individual and the data communicated. This commitment is reinforced through the technical and organisational measures set out in the Privacy Policy of the Internal Information System.

3.1.5 Actions taken in relation to material impacts on own workforce, approaches to mitigate material risks and leverage material opportunities related to own workforce, and effectiveness of such actions (S1-4)

(S1-4:37-38a-38b-38c-38d-39-40a-40b-41-43. ESRS 2 65a-68a-69a)

As indicated in sections 3.1.1 and 3.1.2, Tubacex implements a structured and proactive approach to managing the impacts, risks and opportunities affecting its own workforce, supported by methodologies for identification, analysis and monitoring. Each impact is analysed considering its consequences and context, enabling the definition of action plans aimed at mitigating and remedying it appropriately. This system is supported by the reporting mechanisms, feedback processes and periodic surveys described in the previous sections, fostering continuous improvement.

In addition, Tubacex promotes specific measures to strengthen well-being, equality and inclusion in the workplace, fostering training, work-life balance and gender equality as key pillars of its corporate culture, in line with the policies described in Annex III.

Actions to manage labour risks and improve working conditions are structured across various lines of action aligned with the objectives of the Training and Development Policy, the Diversity, Equity and Inclusion Policy, the Occupational Health and Safety Policy and the General Sustainability Policy:

- **Working conditions:** These actions are directly related to the objectives of the Training and Development Policy:
  - o Promotion of permanent employment contracts and social benefits.
  - o Shift rotation adapted to organisational needs, with strict respect for rest periods.
  - o Salary negotiation within the framework of collective agreements and verification of fair wages.
  - o Integration of sustainability topics into labour-related discussions, such as equality, health and safety.
  - o Promotion of work-life balance through family leave and flexible working arrangements.
  - o Implementation of health and safety plans across all plants, with ISO 45001 certification and awareness campaigns.
  - o Increased training in health and safety matters and improvements in work equipment.

- **Equal treatment and opportunities for all:** These actions are directly related to the objectives of the Diversity, Equity and Inclusion Policy:

o Analysis of gender diversity and specific recruitment and promotion measures for women.

o Physical and digital accessibility measures to facilitate the inclusion of persons with disabilities.

o Periodic review of capabilities and launch of an e-learning platform to support professional development.

o Implementation and monitoring of Equality Plans. In the Basque Country plants, Tubacex Tubos Inoxidables and Acería de Álava approved a new Equality Plan in 2023. In other plants where no plan is yet in place, there are protocols against psychological harassment, sexual harassment or harassment based on sex and/or physical violence (Tubacex Service Solutions), manuals with specific sections focused on non-discrimination (NTS-Amega Group), specific non-discrimination policies (Tubacex Tubes and Pipes, India), or policies promoting the prevention of discrimination (USA, Saudi Arabia, Singapore, among others).

• **Other labour rights:** These actions are directly related to the objectives of the Diversity, Equity and Inclusion Policy:

o Implementation of measures to control hiring age.

o Promotion of training programmes within local communities.

If an impact is identified, the remediation process follows the stages described in section 3.1.4: root cause analysis, definition and implementation of corrective actions, and continuous monitoring to ensure effective mitigation. Actions may include process modifications, additional training or other measures, depending on the nature of the impact. The satisfaction of affected personnel is assessed through surveys and feedback, enabling adjustments to ongoing solutions.

In addition to corrective measures, Tubacex promotes initiatives aimed at generating opportunities for its workforce, beyond mere regulatory compliance, consolidating a safe, fair and motivating working environment. These include:

• Flexible and people-oriented work organisation, contributing to sustainable career paths and greater stability and well-being.
• Programmes that strengthen financial security and economic stability for employees.
• Well-being and job satisfaction: a participatory work environment that enhances motivation, recognition and sense of belonging.
• Structured dialogue and employee participation spaces, even in contexts of low representation.
• Advanced occupational health and safety systems that exceed regulatory requirements and extend best practices to countries with emerging legislation.
• Equality, pay equity and diversity policies, as well as specific initiatives to strengthen female leadership and other dimensions of diversity such as age, origin, religion, beliefs, etc.
• Training in key skills and reskilling programmes for industrial personnel to support a just transition.
• Housing programmes and support for relocated personnel, facilitating integration and reducing the personal and family impact of mobility.

Monitoring and evaluation of actions are carried out through employee experience surveys, direct feedback and the analysis of indicators such as satisfaction levels, turnover, participation in flexible working programmes, contract conversion rates, collective bargaining coverage, the presence of women in management positions and the percentage of persons with disabilities employed. Results are periodically reviewed by the People and Sustainability Management, reinforcing continuous improvement and the creation of shared value with the workforce.

As described in section 3.1.4, the Internal Information System and the Compliance Plan constitute key elements in the management of impacts, risks and opportunities related to own workforce. The former ensures secure and confidential channels for reporting impacts; the latter establishes guidelines for managing ethical and regulatory risks, ensuring compliance with labour legislation, equality, well-being and safety policies, and local requirements across all geographies where Tubacex operates. This preventive approach, combined with continuous evaluation of internal processes and a corporate culture based on ethics, inclusion and respect, enables the minimisation of the likelihood of negative impacts and the leveraging of opportunities related to diversity, training and talent development.

During the 2024 financial year, financial resources allocated amounted to €250,000 in OpEx, while in 2025 this figure amounts to €150,000, allocated to actions related to the management, consolidation and development of policies and practices concerning personnel. Specifically, these amounts cover management and monitoring tools, processes for the consolidation and analysis of social information, as well as training actions aimed at strengthening internal capabilities in people management. These investments are integrated into the Group's ordinary management and respond to the continuous improvement of the talent management model, contributing to the strengthening of human capital and the appropriate monitoring of the Company's social commitments.

3.1.6 Targets related to the management of material impacts, the promotion of positive impacts, as well as risks and opportunities (S1-5)

(S1-5: 46-47a-47b-47c. ESRS 2 68c-75-77a-77b- 80a-80b-80c-80d-80e-80f-80j)

During 2025, Tubacex continued to promote medium-term targets in working conditions, equal treatment and opportunities, and other labour rights. These targets, reviewed annually, remain in force without significant changes in 2025.

PILLAR 3: People and communities

Action: Health and Safety Projects per plant
Target to be achieved and relationship with policies*:* Reduce the Lost Time Injury Frequency Rate (LTIFR) and severity rate by 75%, promote projects aimed at improving frequency and accident rates, and achieve certification of plants under ISO 45001. Achieve 100% of plants certified under ISO 45001. Health and Safety Policy. **Scope of action***:* The entire Group. **Reference value**: LTIFR: 25.7 **Base year***:* 2019 **Time horizon***:* 2030 **Validation***:* Validated by Tubacex

Actions / Initiatives	**Parameter to be measured and definition**	**Significant methodologies and hypotheses**	**Performance against target**
- Health and Safety Projects by Plant - Standardization of HSE KPIs	Lost Time Injury Frequency Rate (LTIFR) and severity rate	Number of lost time accidents / hours worked *1.000.000	**2024 Result**: LTIFR: 9.39 **2025 result**: LTIFR: 9.93. The increase in LTIFR is mainly due to the improvement of methodological criteria and incident identification and recording systems

Action: Talent Development and Management

Target to be achieved and relationship with policies*:* Increase training and professional development opportunities for the workforce, promoting continuous improvement of skills and internal growth; Training and Professional Development Policy, Equality of Opportunity, Non-Discrimination and Inclusion Policy.

Scope of action*:* The entire Group

Reference value*:* N/A

Base year*:* 2025

Time horizon*:* 2030

Validation*:* Validated by Tubacex

Actions / Initiatives	Timeframe:	Parameter to be measured and definition	Significant methodologies and hypotheses	Performance against target
- Review of internal promotion processes - Individual diagnosis and development plans - ESG Training - Employee Engagement Assessment	- 2030 - 2030 - 2030 - 2025	- N/A	- N/A - N/A - % of the workforce trained over total workforce - % of the workforce assessed over total workforce	**2025 results:** In 2025, training on the online learning platform was launched, and the first two courses were deployed (Cybersecurity and Code of Conduct). In addition, new courses were opened on Human Rights, Sustainable Development Goals (SDGs), Climate Action and Equality. **2024 result:** Employee engagement assessment conducted covering 100% of the workforce, ahead of the planned schedule.

Action: Equal opportunities and Inclusion
Target to be achieved and relationship with policies*:* Promote diversity and ensure the elimination of any form of discrimination in the workplace, fostering fair treatment and equal access to development and promotion opportunities; Equality of Opportunity, Non-Discrimination and Inclusion Policy. **Scope of action***:* The entire Group **Reference value***:* **Base year***:* 2025
Validation*:* Validated by Tubacex

Actions / Initiatives	**Time horizon:**	**Parameter to be measured and definition**	**Significant methodologies and hypotheses**	**Performance against target**
- Diversity monitoring and targets by BU - Analysis and action plan for gap reduction - Inclusion of diversity criteria in recruitment processes - Extension of the recruitment model with functional diversity by BU - Improvement of communication materials accessibility	- 2025 - 2027 - 2030 - 2030 - 2025	- Gender distribution by business unit, and analysis of remuneration by category, age, business unit and professional classification - % of job postings with social criteria / Total number of job postings - % of staff with functional diversity	- Difference between average male remuneration and average female remuneration, expressed relative to average male remuneration, excluding from the calculation remuneration categories not occupied by both sexes within each individual company. - Number of employees with disabilities / Total number of employees - No. of workers with disabilities / No. of total workers	**2024 results:** Progress was made in accessibility and inclusive communication. The corporate website was adapted to improve accessibility for people with visual impairments (one year ahead of the planned time horizon), and the development of video-format communication materials was promoted, expanding channels and formats for access to information. **2025 results:** Full workforce parametrisation has been completed, representing a significant improvement in the availability and quality of diversity-related information. This milestone enables a more detailed view of female representation by function, professional category and organisational unit, as well as disaggregated remuneration data, thereby laying the foundations for the definition of specific and tailored action plans for each area. In the field of selection and internal promotion processes, the integration of diversity and social criteria in the analysis of the offers launched has been identified as an area for improvement. Currently, this level of analysis is not carried out systematically, so its incorporation is part of the future lines of work of the project for the review of internal promotion processes.

Table 3: Actions and targets related to own workforce

Tubacex has begun to define medium-term targets for its own workforce. Although, on this occasion, this has not been carried out through a formal collaborative process, employees have the opportunity to propose improvements or raise issues through the communication channel. In this financial year, the definition of specific targets has been carried out by the Company's management, taking into account aspects recognised and valued by the most widely accepted sustainability standards.

To monitor the Company's performance in relation to the established targets, employee satisfaction surveys and other feedback mechanisms are used. These surveys enable the Company to obtain information on progress in the implementation of the targets and the effectiveness of the actions taken.

At present, as these targets are new for Tubacex's own workforce, there are not yet significant lessons learned or improvements derived from the results obtained. It is expected that, as the process evolves, the results will provide not only medium-term improvements but also valuable information to refine and enhance the targets in the future.

3.1.7 Characteristics of the Company's employees (S1-6)

(S1-6:50a-50b-50c-50di-ii--50f)

The total number of employees is detailed below, expressed as headcount, together with the breakdown by gender and by country for Tubacex in the 2024 and 2025 financial years:

Number of employees by gender	2024	2025
Men	2,371.00	2,403.00
Women	395.00	383.00
Other*	-	-
Not disclosed	-	-
TOTAL	**2,766.00**	**2,786.00**

Table 56: Breakdown of employees by gender

** Gender as specified by the employees themselves*

Number of employees by country	2024	2025
Spain	818.00	813.00
Austria	445.00	424.00
United States	369.00	360.00
United Arab Emirates	256.00	334.00
India	245.00	262.00
Italy	172.00	172.00
Saudi Arabia	189.00	158.00
Thailand	89.00	93.00
Norway	57.00	55.00
Canada	46.00	39.00
Brazil	23.00	24.00
Singapore	19.00	15.00
Guyana	15.00	15.00

Number of employees by country	2024	2025
France	10.00	8.00
China	6.00	6.00
Netherlands	4.00	4.00
Germany	2.00	2.00
South Korea	1.00	1.00
United Kingdom	-	1.00
TOTAL	**2,766.00**	**2,786.00**

Table 57: Breakdown of employees by country

The total number of employees reported in the two tables above is also reflected in section 24 "Personnel Expenses" of the Group's financial statements, ensuring the consistency and traceability of the information presented in this report.

The distribution of Tubacex's workforce is set out below in full-time equivalent (FTE) terms, broken down by type of contract and by gender.

2024	Women	Men	Other	Not disclosed	Total
Number of employees	377.49	2,288.87	-	-	**2,666.36**
Number of permanent employees	364.05	2,117.23	-	-	**2,481.28**
Number of temporary employees	13.44	171.64	-	-	**185.08**
Number of employees with non-guaranteed hours	0.00	0.00	-	-	**0.00**

Table 4: Breakdown of employees (FTE) by type of employment contract and gender

2025	Women	Men	Other	Not disclosed	Total
Number of employees	373.78	2,369.00	-	-	**2,742.78**
Number of permanent employees	366.96	2,211.94	-	-	**2,578.90**
Number of temporary employees	6.82	157.06	-	-	**163.88**
Number of employees with non-guaranteed hours	0.00	0.00	-	-	**0.00**

Table 5: Breakdown of employees (FTE) by type of employment contract and gender

Total number of employees who have left the Company and employee turnover rate:

	2024	2025
Number of employees who have left the company	487.00	509.00
Turnover rate	0.18	0.18

Table 6: Employees leaving the company and turnover rate

At Tubacex, we work to ensure transparency and accuracy in the collection and reporting of information relating to our workforce. During 2024, the Company implemented a significant improvement in its methodologies, evolving from decentralised systems to a unified platform that facilitates the generation of consistent and up-to-date data. Throughout 2025, further progress has been made with the aim of enhancing the analytical capacity of the plants.

Accordingly, all information is centralised through the Employee Portal in a single record, improving the accuracy and traceability of the reported data, including a more precise breakdown by gender and other variables.

For employees who have not worked the full year, a proportional approach has been adopted, aligned with the "full-time equivalent" (FTE) methodology. This approach enables a more accurate reflection of the effective contribution of each employee during the reference period, ensuring the consistency and comparability of the data collected.

Depending on the specific requirements of each indicator, data are reported either as a figure at a specific point in time (for example, at the end of the reporting period) or as an average calculated over the course of the yar.

3.1.8 Characteristics of non-employee workers within the Company's own workforce (S1-7)

In accordance with the proportionality provisions introduced by Delegated Act (EU) 2025/4812, the Group does not include in this report the information corresponding to disclosure requirement S1-7.

3.1.9 Collective bargaining coverage and social dialogue (S1-8)

(S1-8: 60a-60b-60c-63a-63b-AR70)

In 2025, 60.27% of Tubacex's employees are covered by collective bargaining agreements (63.41% in 2024), thereby ensuring the protection of their labour rights and access to fair and regulated working conditions.

The quantitative information on the coverage of collective bargaining agreements and social dialogue at Tubacex is set out below, distinguishing between the European Economic Area (EEA) and other regions in which the Company operates.

Within the EEA, the existence of one or more collective bargaining agreements and the percentage of employees covered in each country where Tubacex has significant employment (a minimum of 50 employees representing at least 10% of the total workforce) are detailed. In the current financial year, information is also included on collective bargaining coverage for employees outside the EEA in those regions that meet the criteria of having more than 50 employees and representing more than 10% of the total workforce.

The variation compared to the previous financial year is due to a change in the geographical disaggregation of reporting. In 2024, the Middle East region was included within Asia. Following the expansion of the Group's scope during the current financial year, including new additions in this region, it has been considered appropriate to report it separately.

Furthermore, in the area of social dialogue, information is provided on the percentage of employees represented by workers' representatives, with specific reporting at national level in each EEA country where the Company has significant employment. However, Tubacex does not have specific agreements for the representation of its employees through a European Works Council, a Societas Europaea (SE) Works Council or a European Cooperative Society (SCE)

Works Council. Therefore, employee representation is channelled through the social dialogue mechanisms existing in each country.

2024	Collective bargaining coverage		Social dialogue
Coverage rate	Employees - EEA(For countries with > 50 employees, representing > 10% total wages.)	Employees - Non-EEA (Estimate for regions with > 50 employees, representing > 10% total employees.)	Coverage rate
0%-19%	-	Asia, Middle East	0%-19%
20%-39%	-	America	20%-39%
40%-59%	-	-	40%-59%
60%-79%	-	-	60%-79%
80%-100%	Spain, Austria	-	80%-100%

2025	Collective bargaining coverage		Social dialogue
Coverage rate	Employees - EEA(For countries with > 50 employees, representing > 10% total wages.)	Employees - Non-EEA (Estimate for regions with > 50 employees, representing > 10% total employees.)	Coverage rate
0%-19%	-	Middle East	0%-19%
20%-39%	-	Americas, Asia	20%-39%
40%-59%	-	-	40%-59%
60%-79%	-	-	60%-79%
80%-100%	Spain, Austria	-	80%-100%

Table 7: Employees covered by collective bargaining

** This table only includes companies with more than 50 employees (FTE) that represent at least 10% of the Group's employees (FTE).*

** Unlike the previous financial year, this table does not include information on the coverage of collective bargaining for employees outside the EEA in entities with more than 50 employees representing more than 10% of the total workforce, in accordance with the transitional provision.**

3.1.10 Diversity metrics (S1-9)

(S1-9: 66a-66b-AR71)

At Tubacex, senior management is composed of the members of the Executive Committee, who report to the Chief Executive Officer. This group of leaders is responsible for strategic decision-making and the overall management of the Company.

The composition of senior management is set out below, detailing the distribution by gender, both in absolute numbers and as a percentage.

Number of people employed in senior management	2024	2025
Men	10.00	9.00
Women	1.00	2.00
Others	-	-

Number of people employed in senior management	2024	2025
Not communicated	-	-
TOTAL	**11.00**	**11.00**

Table 62: Employees in senior management (number)

Percentage of people employed in senior management	2024	2025
Men	91%	82%
Women	9%	18%
Others	-	-
Not communicated	-	-
TOTAL	**100%**	**100%**

Table 63: Employees in senior management (%)

In addition, data are provided on the distribution of employees as at 31 December 2024 and 2025 by age group.

Average number of employees by age group	2024	2025
<30 years	300.00	352.00
30 and 50	1,696.00	1,707.00
>50	780.00	727.00
TOTAL	**2,776.00**	**2,786.00**

Table 64: Employees by age group

** In the current financial year, the calculation criterion for this table has been modified, changing from FTE (Full-Time Equivalent) to headcount as at 31 December, following a more detailed analysis and improved interpretation of the requirements set out in the applicable standard. As a result of this methodological change, the figure corresponding to FY24 has been restated in order to ensure comparability of the information.*

3.1.11 Adequate wages (S1-10)

(S1-10: 69)

The Company ensures that all employees receive adequate wages, in accordance with applicable benchmark indices. The collective bargaining agreements applicable at Tubacex regulate the average remuneration of employees, establishing criteria of fairness across different job roles, without discrimination on the basis of gender. Both the remuneration of personnel whose pay is governed by collective agreements and that of those subject to other systems is determined on an equitable basis, thereby ensuring fair wages in line with regulations and the principles of equality within the Company.

3.1.12 Social protection (S1-11)

(S1-11: 74)

All Tubacex employees are covered by social protection, either through public programmes and/or through benefits provided by the Company, against loss of income arising from illness, work-related accidents and acquired disability, parental leave and retirement. The structure of this coverage varies depending on the regulatory framework of each country and the specific characteristics of each company within the Group, adapting to local regulations and the social protection systems in force in each jurisdiction.

3.1.13 Persons with disabilities (S1-12))

In accordance with the proportionality provisions introduced by Delegated Act (EU) 2025/4812, the Group does not include in this report the information corresponding to disclosure requirement S1-12. Nevertheless, information

related to persons with disabilities is set out in Section II: Requirements of Law 11/2018 (Non-Financial Information Statement – EINF).

3.1.14 Training and skills development metrics (S1-13)

(S1-13: 83b)

The average number of training hours per employee is set out below, broken down by gender:

Average number of training hours per employee	2024	2025
Men	11.33	21.30
Women	15.14	21.15
TOTAL	**11.87**	**21.28**

Table 65: Training hours per employee (number)

In accordance with the proportionality provisions introduced by Delegated Act (EU) 2025/4812, the Group does not include in this report the information corresponding to disclosure requirement S1-13 relating to periodic performance and professional development reviews.

3.1.15 Health and safety metrics (S1-14)

(S1-14: 88)

Tubacex maintains a strong commitment to the safety and well-being of its workforce, ensuring working environments that minimise risks and guarantee the protection of all employees. Detailed information on the management of health and safety is set out below.

	2024	2025
Percentage of in-house workers covered by the company's health and safety management system	98.52%	100.00%
Number of fatalities from work-related injuries and illnesses (1)	0	2
Number of recordable occupational accidents* (includes total lost-time accidents (54) and no lost-time accidents (94))	148	148
Number of recordable occupational disease cases	8	2
Recordable occupational accident rate	LTIFR 9,39	LTIFR 9,93

Table 66: Occupational health and safety indicators

(1) During the financial year, two fatal accidents involving subcontracted personnel were recorded at the plant in India (TTP), after which the Company immediately reinforced subcontractor control procedures and health and safety measures.

** In the current financial year, indicators relating to the number of days lost due to injuries, illnesses and deaths resulting from occupational accidents are not reported, in accordance with the transitional provision.*

3.1.16 Work-life balance (S1-15)

(S1-15: 93a-93b)

Tubacex ensures equitable access to family-related leave for all its employees. Currently, 100% of the Company's workforce is entitled to such leave, thereby supporting work-life balance in compliance with applicable regulatory frameworks.

Among all employees entitled to this leave, the percentage of those who made use of it during 2024 and 2025, broken down by gender, is as follows:

	2024	2025
Women	7.68%	9.10%
Men	5.55%	5.53%
TOTAL	5.85%	6.02%

Table 67: Employees entitled to family-related leave

3.1.17 Remuneration metrics (gender pay gap and total remuneration) (S1-16)

(S1-16: 97a-97b-97c)

At Tubacex, we are committed to transparency and pay equity across all our operations. To calculate the gender pay gap, we use both an adjusted methodology —which considers only those categories and positions in which both genders are represented— and an absolute methodology, which takes into account the remuneration of all employees.

For the calculation of this indicator, the total remuneration received is considered (base salary, seniority, allowances, overtime and bonuses), and the remuneration of all employees across the different Group companies is included. The different metrics (absolute, adjusted, annual and hourly) help us to monitor the evolution of each company in terms of both representation and pay equity.

The absolute gender pay gap for 2025 is 5.13%, compared to 9.73% in 2024.

Tubacex Group companies actively work to identify and eliminate situations of pay inequality. However, when calculating the Group's pay gap, the indicator is also influenced by other factors, including which companies are incorporating the largest number of employees. During 2025, the Group's growth in countries (UAE and Asia) where the presence of women in industrial environments remains very limited has affected overall averages, resulting in a reduction in the gap. In these countries, the average salaries of operators are below the Group average and employees are predominantly, if not exclusively, male, which consequently reduces the average remuneration of men.

A similar effect occurs in the calculation and comparison of hourly remuneration. The gender differential in hourly pay during 2025 was –4.86%, compared to –1.95% in the initial calculation carried out in 2024. In this case as well, the increase in the number of hours worked (both regular and overtime) in male-dominated countries with salaries below the Group average has had the effect of reducing men's hourly remuneration.

With regard to the consolidated figure, it encompasses highly diverse realities and establishes comparisons between very different companies, meaning that it does not reflect the actual evolution of each individual entity in terms of integration and pay equity.

This variation is determined by the lower presence of women in operations in general, and particularly in the countries where Tubacex Group is growing (especially in the UAE and Asia). This effect is further amplified by the higher number of hours (regular and overtime) worked in these countries and categories.

The result is influenced by factors other than actual remuneration, such as the highly uneven representation of women across the different companies and the differing pay levels between countries.

For this reason, effective gender equality is analysed and managed at company level, isolating the effect that consolidation of the data may have on the pay gap result.

REMUNERATION PARAMETERS	2023	2024	2025
Annual absolute pay gap (%)	8.67%	9.73%	5.13%
Absolute hourly pay gap (%)	*	-1.95%	-4.86%

Table 68: Effective gender equality in remuneration parameters

** In 2023, the hourly pay gap was not calculated, as this requirement was introduced in 2024.*

In terms of remuneration, in the 2024 financial year, the ratio between the total annual remuneration of the highest-paid individual and the average total annual remuneration of employees at Tubacex was 7.86. In the current financial year, this ratio is 13.58. This difference is due to the inclusion of the remuneration of the Executive Committee in the calculation and the change in measurement methodology, moving from the mean to the median, in accordance with the requirements established by the CSRD.

Looking ahead, progress in integrating financial information into a single tool will enable more precise and consistent data collection and management, resulting in a more detailed and representative analysis of the pay gap. This progress underscores Tubacex's commitment to continuous improvement in transparency and equity.

3.1.18 Incidents, complaints and severe human rights impacts (S1-17)

(S1-17: 103a-103b-103c-103d-104a-104b)

During the reporting period, four reports were submitted through the Whistleblowing Channel, two of them in the 2024 financial year, all related to leadership style and organisational culture. These reports have been handled in accordance with the internal procedures established, based on the assessment of each case, and have resulted in recommendations regarding management style and compliance with internal regulations. None of these reports has led to compensation, sanctions or fines.

It should be noted that, during the 2024 and 2025 financial years, no severe human rights incidents involving the Company's workforce have been identified. The identification of such cases is carried out through local channels or via direct contact with the People team, or through other instruments such as the National Contact Points for Multinational Enterprises of the OECD (Organisation for Economic Co-operation and Development). Consequently, no sanctions, fines or compensation related to these matters have arisen during the period under review.

3.2 Workers in the value chain (S2)

(S2 ESRS 2: 17-17 a)

Tubacex is progressively advancing in strengthening its knowledge and control over the value chain, with the aim of obtaining an increasingly comprehensive view of the impacts, risks and opportunities associated with its different stages. At present, analysis and reporting are primarily focused on the upstream value chain, particularly on suppliers, as this is the area where the Company has structured information, specific assessment tools and direct capacity for action.

This approach is based on a risk-based criterion, prioritising suppliers and procurement categories according to their criticality, geographical location and exposure to risks related to human rights and working conditions. During 2025, Tubacex has reinforced this approach through the implementation of standards of conduct and operational mechanisms for sustainable procurement, enabling a more systematic integration of social and labour criteria into purchasing processes and supplier management. In parallel, the Company continues to develop capabilities to improve traceability and knowledge of other stages of the value chain, fostering the progressive integration of more detailed information in future reporting periods.

The topics addressed in this chapter cover all sustainability matters material to workers in the value chain, including:

- Economic, social and cultural rights, related to working conditions, health and safety, and other labour

rights.
• Equal treatment and opportunities for all, including risks of discrimination, exclusion and inequality.
• Other labour rights, such as freedom of association, collective bargaining, social dialogue and access to grievance and remediation mechanisms.

In response, Tubacex's strategy and business model incorporate a due diligence approach aimed at identifying, preventing, mitigating and, where appropriate, remedying actual and potential adverse impacts on this group, through corporate policies and control mechanisms within the value chain, as developed in the following sections.

For more detailed information on impacts, risks and opportunities, their relationship with the value chain and Tubacex's strategy, please refer to Table 14 in section 1.3.3 of this report, as well as Table 2 in Annex II: Detail of material impacts, risks and opportunities.

3.2.1 Policies related to workers in the value chain (MDR-P)

(MDR-P ESRS 2: 17 c)

Tubacex recognises the fundamental importance of respecting Human Rights, including labour rights, for all individuals forming part of its value chain. In line with this commitment, the Company has defined processes aimed at identifying, preventing, mitigating and, where appropriate, remedying actual or potential adverse impacts on human rights arising from its business relationships.

Within this framework, Tubacex has a Supplier Code of Conduct, which establishes the minimum standards of ethical, social and labour behaviour required of all suppliers, contractors and third parties. This Code is based on international human rights and labour principles and constitutes a central element of the due diligence system within the supply chain. Compliance with it is mandatory and is reinforced through its integration into supplier qualification and contracting processes, as well as through its explicit reference in the Group's general purchasing conditions.

Additionally, during 2024, the Procurement Policy was revised to incorporate specific sustainability criteria and the protection of labour rights of workers in the upstream value chain. In 2025, this framework has been further strengthened through the adoption of operational standards for sustainable procurement, aligned with ISO 20400, which translate commitments into requirements applicable to supplier selection, evaluation and monitoring processes.

These operational standards are managed and supervised by the Procurement function, in coordination with the Sustainability function, and aim to effectively manage material impacts, risks and opportunities related to workers in the value chain, ensuring consistency between corporate commitments and their practical implementation.

3.2.2 Actions and resources related to workers in the value chain (MDR-A)

(MDR-A ESRS 2: 17 d)

In line with the policies and operational standards described, during 2025 Tubacex has strengthened the implementation of operational actions aimed at managing social and labour risks within its upstream value chain. The main actions include:

• The review of the ESG supplier assessment model, based on risk, criticality and geographical location criteria, enabling the depth of analysis to be adapted to each supplier's profile.
• The integration of human rights and labour requirements into supplier qualification processes, including ESG contractual clauses and adherence to the Supplier Code of Conduct.
• The application of a supplier segmentation system (basic, standard and critical), which determines monitoring, assessment and audit mechanisms according to the level of identified social risk.
• The structured management of non-compliance through the Supplier Non-Compliance Policy, which establishes clear procedures for detection, corrective action plans, monitoring and escalation in cases of non-compliance related to working conditions, human rights or other relevant ESG aspects.
• In addition, training, awareness and continuous improvement initiatives are being assessed and designed, both internally and for suppliers, aimed at strengthening knowledge and the application of social and labour requirements.

As a result of the implementation of these actions, and in accordance with the Sustainable Procurement Standard, Tubacex has made progress in the deployment of a structured model for managing social and labour risks in the upstream value chain, integrated into procurement processes and supplier relationships. In particular, the review of the ESG assessment model and supplier segmentation have enabled the organisation and prioritisation of supplier monitoring based on their level of risk and criticality, in line with the criteria defined in the Standard.

Furthermore, the incorporation of requirements related to human rights and working conditions into qualification and contracting processes has strengthened supplier alignment with the social and labour commitments required by the Group, establishing these requirements as a condition for initiating and maintaining commercial relationships, as предусмотрено in the Sustainable Procurement Standard.

In cases where deviations or areas for improvement have been identified, the application of the Supplier Non-Compliance Policy, as set out in the Standard, has enabled the activation of corrective action plans and their monitoring, with the aim of addressing identified issues and preventing their recurrence. This approach contributes to the mitigation of potential social and labour risks, as well as to the progressive strengthening of compliance with the standards established by Tubacex within its supply chain.

Finally, the training and awareness initiatives under development respond to the principle of continuous improvement set out in the Sustainable Procurement Standard, aiming to strengthen knowledge and the proper application of social and labour requirements both internally and among suppliers.

3.2.3 Parameters in relation to workers in the value chain (MDR-M)

(S2 MDR-M NEIS 2: 17 e)

To assess impacts, risks and opportunities related to workers in the value chain, Tubacex uses a set of primarily qualitative parameters, defined in accordance with a risk-based approach and fully integrated into procurement and supplier management processes. The main parameters used include:

- The existence and implementation of policies, codes of conduct and formal commitments relating to human and labour rights by suppliers.
- The degree of alignment of suppliers with international labour standards and the social requirements established by Tubacex.
- The results of ESG assessments, including scores, alerts and social and labour risk ratings.
- The identification of incidents or non-compliances related to working conditions, health and safety, child or forced labour, discrimination or other social risks.
- The level of definition, implementation and closure of corrective action plans, in accordance with the procedures set out in the Supplier Non-Compliance Policy.

These parameters are used to identify, prioritise and manage suppliers with greater exposure to social risks, guide due diligence actions, define corrective measures and strengthen decision-making in relation to responsible procurement. The adequacy and scope of these parameters are reviewed periodically, in line with progress in data availability and the maturity of the supply chain management system.

3.2.4 Monitoring the effectiveness of policies and actions through targets (MDR-T)

(S2 MDR-T ESRS 2: 17 d)

During the 2024 and 2025 financial years, Tubacex has focused its efforts on consolidating the methodological and operational foundations for the management of social and human rights risks within its value chain, particularly in the upstream segment. This period has enabled the definition of evaluation criteria, supplier segmentation and monitoring mechanisms aligned with corporate commitments.

Looking ahead to 2026, the Company plans to progress in the implementation of systematic mechanisms for monitoring suppliers' social performance, supported by digital tools and periodic assessment processes, which will allow for a more structured measurement of the effectiveness of the actions implemented and promote continuous improvement.

At a later stage, Tubacex expects to define additional targets through processes of progressive collaboration with relevant stakeholders in the supply chain, including, where appropriate, workers in the value chain and their legitimate

representatives, ensuring that the targets set are realistic, achievable and consistent with the identified contexts and risks.

3.3 3.3 Affected groups (S3)

(S3 ESRS 2: 17-17 a)

At this initial stage of CSRD implementation, and in accordance with the transitional provisions (Quick Fix), Tubacex adopts a progressive and predominantly qualitative approach to the identification and management of impacts, risks and opportunities related to the communities affected by its activities.

The topics addressed in this chapter cover all material sustainability matters for the different affected groups, including:

- Economic, social and cultural rights, which may generate impacts on the safety, health and well-being of the individuals forming part of the communities in which Tubacex operates.
- Civil and political rights, the infringement of which could result in significant negative impacts in terms of respect for human rights.

In this regard, Tubacex's strategy and business model incorporate a due diligence approach aimed at preventing, mitigating and, where appropriate, remedying actual and potential impacts on the economic, social, cultural, civil and political rights of affected individuals and communities.

This approach is implemented and channelled through the strengthening of its corporate policies, control mechanisms and actions carried out through social initiatives, which enable progress in this human rights and community engagement due diligence process, as described throughout this chapter.

For more detailed information on impacts, risks and opportunities, their relationship with the value chain and Tubacex's strategy, please refer to Table 14 in section 1.3.3 of this report, as well as Table 2 in Annex II "Detail of material impacts, risks and opportunities".

3.3.1 Policies related to affected groups (MDR-P)

(S3 MDR-P ESRS 2: 17 c)

Tubacex has a Human Rights Policy, approved and overseen by the Board of Directors, which establishes the commitment to respect and protect internationally recognised human rights, with the aim of preventing, mitigating and, where appropriate, remedying potential adverse impacts on individuals and communities affected by its activities. This policy applies to all Group activities and functions, across all geographies in which it operates, and is based on the main international human rights instruments.

In addition, Tubacex has a General Sustainability Policy, which sets out the Group's principles and commitments in environmental, social and governance matters, including its responsibility for sustainable development and the responsible management of impacts arising from its activities on the environment and the communities in which it operates. This policy acts as a cross-cutting framework guiding the integration of social and human rights considerations into the Group's strategy and corporate processes.

Furthermore, Tubacex has a Social Action Policy, approved by Management, which defines the framework for contributing positively to social development and the creation of shared value in the communities in which it operates. This policy guides the Group's social actions and its engagement with potentially affected groups, in alignment with international frameworks such as the Sustainable Development Goals and the United Nations Global Compact.

The implementation of the commitments set out in Tubacex's policies is articulated through various corporate instruments. Tubacex recognises the importance of having effective mechanisms in place to monitor compliance with these commitments and to apply measures to prevent, mitigate or remedy potential breaches, in accordance with the United Nations Guiding Principles and other relevant international standards. In this area, initial measures have been implemented, including a whistleblowing channel accessible to stakeholders to report potential human rights violations, ensuring confidentiality and protection of the reporting individual, as well as the investigation of cases where appropriate. In addition, the Tubacex Foundation promotes various initiatives aimed at strengthening social contribution, particularly in areas related to education, diversity and social action within communities.

3.3.2 Actions and resources in relation to affected groups (MDR-A)

(S3 MDR-P ESRS 2: 17 d)

During the 2025 financial year, Tubacex carried out various initiatives aimed at strengthening its social contribution and its relationship with local communities, primarily through the Tubacex Foundation, which promotes social action projects in the regions where the Group operates. These initiatives represent an initial approach to addressing social impacts and fostering constructive relationships with communities, while progress is being made in defining more structured impact management processes.

The main lines of action promoted by the Tubacex Foundation include:

- Training and employability of young people, through educational, training and job placement support programmes aimed at improving professional development opportunities and employability in the local environments where the Group operates.
- Promotion of diversity and inclusion, with a particular focus on functional diversity, encouraging initiatives that support the social and labour integration of people with disabilities and contribute to more inclusive environments within communities.
- Social action in vulnerable regions, through specific projects developed in communities where Tubacex has a presence, primarily focused on the training and education of children, in collaboration with local entities and specialised organisations, with the aim of contributing to the social and educational development of these communities.

In addition to the projects and initiatives promoted by the Tubacex Foundation, the plants have clear guidelines in place to foster social action within their respective regions.

All these initiatives do not replace formal due diligence processes, which are currently under progressive development.

3.3.3 Parameters in relation to affected groups (MDR-M) and monitoring the effectiveness of policies and actions through targets (MDR-T)

(S3 MDR-T ESRS 2: 17 b-17 d-17 e)

Tubacex uses a set of primarily qualitative parameters, progressively complemented by basic quantitative parameters, to carry out an initial monitoring of the effectiveness of its policies and actions in relation to affected communities.

Among the qualitative parameters, consideration is given, inter alia, to the definition of the general objectives of the initiatives undertaken, their alignment with corporate policies, the geographical scope of the projects implemented and the qualitative assessment of their contribution to social and community development.

In addition, Tubacex uses quantitative parameters, such as the number of beneficiaries of the projects implemented, which provide an initial indication of the scope of the actions carried out, without prejudice to the fact that the assessment of social impact remains in a stage of progressive development.

These parameters are reviewed periodically to verify their adequacy and relevance, and serve as a basis for advancing, in future financial years, towards the definition of more systematic monitoring mechanisms and the possible incorporation of additional metrics, depending on the maturity of management systems and the availability of information.

PILLAR 3: Employees and Communities

Initiative / Project	Relationship with policies	Geographical/collective scope	Goal	Main actions	Tracking Parameter	Progress status	2024 and 2025 results
Human Rights Diagnosis	Human Rights Policy	Group	2025	Initial identification of human rights risks by region and activity	Completion of the diagnosis (Yes/No)	Ongoing	The diagnosis was carried out in 2024, and progress was made during 2025 in the definition of a due diligence model.
Quality training for young people	Social Action Policy	Group	2030	Training programmes, dual vocational training and scholarships	Number of young participants	Ongoing	In 2024, 2 students participated in the international scholarships and 36 trainees at the training school in Austria In 2025, 40 students have participated in the dual training programs, 3 students in the internationalization programs.
Green Ideas Awards	Social Action Policy	Spain	2026	Competition to promote young talent in sustainability	Number of participants	Ongoing	Competition declared void in 2025 (1 participant). Relaunched for the 2025/26 cycle. Pending closure of the academic year to assess results.
ESG Campus	Social Action Policy	Group	2030	Sustainability training platform	Number of courses developed	Ongoing	Platform developed in 2024 and preparation of 5 courses for launch. Courses on cybersecurity, AI and code of conduct were launched during 2025.
Colabora Birmania	Social Action Policy	Vulnerable communities	2026	Educational support for Burmese children displaced to Mae Sot (Thailand)	Number of children supported	Ongoing	520 children enrolled per year (2024 and 2025)
SOS Ukraine	Social Action Policy	Basque Country	2026	Support for displaced families	Number of families supported	Ongoing	2 families in vulnerable situations supported during 2024 and 2025.
UNICEF	Social Action Policy	Guyana and Suriname	2027	Access to education, water and sanitation	Number of children benefiting	Ongoing	**Guyana**: 287 children supported as of September 2024. 300 children supported as of September 2025. **Suriname**: 150 children supported (until September 2024) and 100 children in the initial stages until September 2025.

Table 69: Actions and targets related to affected stakeholders

4 Information on governance

4.1 Business conduct (G1)

4.1.1 The role of the administrative, management and supervisory bodies (ESRS 2 GOV-1)

(G1: 5 a-5 b)

The Board of Directors plays a fundamental role in business conduct by overseeing and ensuring that the Company operates in an ethical, lawful and responsible manner. It is responsible for the approval of policies and guidelines that guide business decisions.

Furthermore, it has experience in the identification, management and mitigation of risks related to business conduct, being involved in the approval of sustainability strategies and overseeing the integration of sustainability objectives into the Group's overall strategy. Its scope of supervision includes corporate risks such as conflicts of interest, corruption or unfair labour practices. The Board has the appropriate training and knowledge to address matters relating to business conduct and relies on experts or members with experience in business ethics, sustainability and regulatory compliance.

4.1.2 Business conduct policies and corporate culture (G1-1)

(G1-1: 7-9-10 a-10 b-10 c i-10 c ii-10 e-10 g-10 h-20. ESRS 2: 65 a-65 b-65 c-65 d)

Within the framework of its commitment to good governance, business ethics and regulatory compliance, Tubacex has established a set of corporate policies that regulate business conduct and promote a corporate culture based on integrity, transparency and responsibility, applicable across the entire Group.

In this context, the Code of Conduct, in its latest revision approved by the Board of Directors, sets out the obligations governing the conduct of the Chairman, Chief Executive Officer and other members of the Board of Directors, the non-member Secretary and all Tubacex employees. The Code defines, among other principles, the promotion of equal opportunities, the absence of any form of discrimination, respect for human dignity and the explicit rejection of behaviours involving violence, abuse of authority or intimidation. It also addresses principles of integrity, legality and zero tolerance towards corruption and bribery practices, guided by the values set out in the Universal Declaration of Human Rights.

Tubacex structures the detection, reporting and investigation of potential unlawful conduct or breaches of the Code of Conduct and the Group's internal regulations through its Internal Information System, which constitutes the main mechanism for the early identification of such incidents. The system allows for the submission of reports on a confidential basis, whether identified or anonymous, through the channels enabled by the Company, and is available to Group employees, members of governing bodies and external third parties who maintain or have maintained a professional or commercial relationship with Tubacex. Reports received are recorded, analysed and assessed in accordance with established internal procedures and, where appropriate, an investigation process is initiated to clarify the facts and define the applicable corrective or disciplinary measures, ensuring at all times the confidentiality of the information and the protection of reporting individuals.

The Corporate Policy on the Internal Information System, approved by the Board of Directors, establishes the framework and general principles for the management and monitoring of such reports, with the aim of preventing, detecting and mitigating legal, ethical and reputational risks. It applies to all companies within the Tubacex Group, regardless of their activity, position within the value chain or geographical location, and is applicable to directors, executives, Group professionals and third parties who maintain or have maintained an employment or professional relationship with Tubacex. The Policy also incorporates specific protection measures against retaliation for reporting individuals, ensuring confidentiality, the prohibition of any form of direct or indirect retaliation and the diligent and independent handling of reports, in compliance with Law 2/2023 on the protection of reporting persons, transposing Directive (EU) 2019/1937, and in line with the principles of good corporate governance and regulatory compliance applicable within the European Union.

The management of the Internal Information System (Whistleblowing Channel) is entrusted to the Compliance Officer, appointed by the Board of Directors, who acts with functional autonomy and independence and is provided with the necessary resources to perform their duties. This officer coordinates the investigation of cases related to business conduct, including those linked to potential situations of corruption or bribery, ensuring that processes are conducted

promptly, independently and objectively, and that appropriate corrective or disciplinary measures are adopted where necessary, with the possibility of relying on internal or external support when required.

Additionally, the Whistleblowing Channel Privacy Policy, approved by the Board of Directors, regulates the processing of personal data collected in the management and investigation of reports or queries submitted through the Internal Information System, with the aim of ensuring confidentiality, protecting both reporting individuals and affected persons, and complying with applicable data protection regulations, thereby mitigating legal and privacy risks associated with this process. This Policy applies to all Tubacex Group companies and affects both Group professionals and external collaborators whose personal data may be processed within this framework. It is aligned with Regulation (EU) 2016/679 (GDPR), Organic Law 3/2018 and Law 2/2023, as well as with applicable European and Spanish implementing regulations.

The business conduct framework is complemented by the General Sustainability Policy, approved by the Board of Directors, which establishes the general framework for action of the Tubacex Group in environmental, social and governance matters, with the aim of integrating sustainability into strategy and decision-making, managing impacts, risks and opportunities associated with ESG performance, and monitoring them through internal management, control and reporting systems. The Policy applies to the entire Tubacex Group and is aligned with international frameworks and commitments, including the United Nations Sustainable Development Goals, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines, the ILO Declaration and the Paris Agreement.

Tubacex also has a General Risk Control and Management Policy, approved by the Board of Directors, which establishes the general framework for the identification, assessment, management and control of risks that may affect the Group, including strategic, operational, financial, legal, compliance, environmental, social and reputational risks, as well as their monitoring through the internal control system and corporate oversight processes. The Policy applies to the entire Tubacex Group and is aligned with applicable corporate regulations and best practices in corporate governance and integrated risk management.

Finally, the Social Action Policy, approved by the Board of Directors, establishes the framework for the Tubacex Group's actions in relation to social contribution and engagement with communities, with the aim of generating a positive social impact, promoting local development and coherently channelling social, educational and charitable initiatives linked to the Group's activities, as well as monitoring them through internal management and control mechanisms. The Policy applies to the entire Tubacex Group and is aligned with international commitments on sustainable development, including the United Nations Sustainable Development Goals.

The development and strengthening of Tubacex's corporate culture is based on the application of the ethical principles set out in its internal policies, which guide the behaviour of all individuals within the organisation and its business partners. These principles are reinforced through the promotion of open communication, transparency and regulatory compliance, fostering an environment of trust and responsibility.

The evaluation of corporate culture is carried out through continuous monitoring of the level of compliance with internal policies, as well as the identification of opportunities for improvement, with the aim of progressively strengthening the Group's commitment to integrity, good governance and sustainability.

Corporate policies related to business conduct and ethics are available and accessible to all relevant individuals through the Tubacex corporate website, ensuring their dissemination and awareness within the organisation and among relevant stakeholders.

Although, to date, specific aspects related to corruption and bribery had not been the subject of dedicated training programmes, Tubacex recognises the growing importance of strengthening awareness and training in ethics and compliance. In this context, in 2025 the Company launched an online training platform, accessible to the entire workforce, through which a mandatory course on the Code of Conduct has been introduced. This training aims to ensure that all employees understand and apply the ethical principles that guide decision-making and behaviour within the organisation (DP 10 g).

The training is addressed to the entire workforce, with particular focus on groups with greater capacity to influence decision-making, manage significant resources or access sensitive information, thereby reinforcing a consistent ethical culture across the organisation.

In this regard, Tubacex has identified that positions with the highest potential exposure to corruption and bribery risks are those combining decision-making authority, interaction with third parties and access to financial or strategic resources. These primarily include the following groups:

- Senior Management and executive positions
- Procurement personnel
- Sales managers and commercial functions
- Finance personnel
- Legal and Compliance personnel

4.1.3 Supplier relationship management (G1-2)

(G1-2: 14-15 a-15 b-20)

At present, Tubacex does not have a defined policy in place to prevent delays in payments. However, pursuant to Law 10/2015, third transitional provision, companies are required to disclose information regarding the average payment period to suppliers.

Tubacex systematically incorporates social and environmental criteria into the selection, evaluation and approval of its suppliers, in line with the sustainability requirements defined by the Group. To this end, it maintains a stable supplier panel, with periodic assessments that enable the identification and management of potential risks associated with procurement processes.

At year-end, 978 suppliers, representing 92.7% of the total purchasing volume (913 suppliers in 2024, representing 87.7% of the purchasing volume), had been assessed on ESG matters. All of them are required to meet the social and environmental requirements established by Tubacex for their approval, confirming that no significant impact arising from their activity has been identified.

During 2024, Tubacex reviewed and strengthened its procurement management processes with the aim of driving its supply chain in line with its sustainability commitments. As part of this process, the Company analysed the social, environmental and governance impact of its Tier 1 suppliers by category and region, in order to define a more robust approval model, oriented towards the specific risks of each supplier type and the most appropriate approach to assess and improve their sustainability performance.

This evaluation and approval process incorporates, among others, the following criteria:

- Availability of environmental management systems, legal compliance and environmental policies communicated to employees and suppliers.
- Existence of occupational health and safety systems that identify and manage risks associated with the activity.
- Commitments relating to human rights and working conditions, including the prohibition of child labour, non-discrimination policies, freedom of association and prevention of harassment.
- Compliance with ethical and anti-corruption criteria, business integrity, data protection and responsible use of intellectual property.
- Requirement for suppliers to ensure environmental, labour and ethical compliance within their own supply chain.

In this way, ESG criteria are not only considered in the initial selection process but form part of an ongoing evaluation process, enabling Tubacex to manage risks, promote responsible behaviour and ensure that its value chain operates in accordance with the highest sustainability standards.

4.1.4 Prevention and detection of corruption and bribery (G1-3)

(G1-3: 18 a-18 b- 18 c-20-21)

Tubacex has established an Internal Information System, available to and intended for the entire Group, which is primarily composed of the so-called “Whistleblowing Channel”. This Whistleblowing Channel is configured as a formal

and secure mechanism for communication, consultation and/or reporting of potential irregularities, including cases of corruption and bribery, with the protection of the reporting individual being one of its guiding principles.

To this end, the Group has various communication mechanisms in place that promote and encourage a culture of open, fluid and transparent communication, forming the basis of the Group's Internal Information System.

More specifically, the following reporting and communication channels are made available to its professionals and collaborators:

- Online Whistleblowing Channel tool, a multi-channel IT platform accessible to all its professionals and collaborators. It is available on the corporate website www.Tubacex.com and is technically managed by an external third party.
  Through the Employee Portal, access is also provided to the online Whistleblowing Channel tool, particularly for submitting complaints or claims related to administrative and/or employment matters concerning employees.

- The option is also provided to report any conduct verbally, by requesting an in-person meeting with the person submitting the report (the "Reporting Individual") with the person responsible for the Internal Information System or, where applicable, with external managers designated by them.

Notwithstanding the possibility of submitting reports, complaints and/or claims through any of the channels described, it should be noted that only those communications relating to conduct that may constitute a criminal offence or a serious or very serious administrative infringement will be covered by the protection measures established under Law 2/2023 of 20 February.

In addition, the Internal Information System also allows for the submission of queries or requests for clarification that may arise in this regard.

The Board of Directors of Tubacex S.A. has appointed the Compliance Officer as the sole person responsible for the Group's Internal Information System, tasked with ensuring its proper functioning and management.

In the event that any irregularity is detected, this person will be responsible for reporting the findings, gathering the necessary information and preparing a detailed report to be presented to the Board of Directors in a private meeting. This report will include the results of the investigation, the recommended corrective measures and the actions to be taken to ensure compliance with internal policies.

The person responsible for the System shall act with autonomy and independence from any other bodies, committees or commissions within Tubacex, and shall ensure the diligent handling of the procedures for managing the communications received. They shall not receive instructions of any kind in the exercise of their duties and must be provided with all necessary human and material resources to perform them.

In this regard, for the proper performance of their role and in connection with subsidiaries located in third countries, the person responsible for the System may delegate the management and processing of investigations to Compliance Department delegates in those subsidiaries, where deemed appropriate. Likewise, depending on the nature, complexity, significance or individuals involved in the reported facts, particularly in situations of potential conflict of interest, and where deemed appropriate by the person responsible for the System, support from external third parties may be sought.

As noted in the section "Business conduct policies and corporate culture (G1-1)", the Group has not yet conducted specific training programmes on anti-corruption and anti-bribery matters, although such programmes are planned for 2026.

4.1.5 Cases of corruption or bribery (G1-4)

(G1-4: 24 a-24 b)

Tubacex has complied with anti-corruption and anti-bribery procedures and regulations and, therefore, has not received any convictions or fines in this area during either 2024 or 2025.

4.1.6 Political influence and lobbying activities (G1-5)

(G1-5: 29 a-29 b i-29 c-29 d-30)

At present, Tubacex does not have representatives within its administrative, management or supervisory bodies specifically responsible for overseeing activities related to political influence and/or lobbying, as it does not make political contributions, whether financial or in kind.

Similarly, Tubacex does not carry out lobbying activities. Consequently, it does not prepare reports or summaries on matters addressed in this area and, therefore, no information is available regarding the Company's positions in relation to such activities or their interaction with the material impacts, risks and opportunities identified in its assessment in accordance with ESRS 2.

Tubacex is not registered in the EU Transparency Register or in any equivalent register of a Member State.

Furthermore, none of the members of the administrative, management or supervisory bodies has held comparable positions in public administration.

4.1.7 Payment practices (G1-6)

(G1-6: 33 a-33 b-33 c-33 d-80 a-80 b-80 c-80 d-80 e-77 a-77 c-77 b-73-75-76-80 f-80 j. ESRS 2: 68 d. MDR-T 80a).

The information required by the Second Final Provision of Law 31/2014, of 3 December, is set out below. This information has been prepared in accordance with the Resolution of the Spanish Accounting and Audit Institute (Instituto de Contabilidad y Auditoría de Cuentas) dated 29 January 2016, adapted to the new requirements established by the aforementioned Law for the first financial year closed following its entry into force. Accounts payable are initially measured at fair value and subsequently measured at amortised cost using the effective interest rate method.

Table 73. Payment practices

Payment Practices	2024	2025
Days		
Average payment period to suppliers	93	83
Ratio of paid transactions	100	90
Ratio of outstanding (unpaid) transactions	63	52
Thousand euros		
Total payments made	189,685	206,134
Total outstanding payments	45,505	46,450
Number of invoices paid within the legal maximum payment period (late payment law)	6,238	9,392
Percentage of the total number of invoices	34%	41%
Number of payments made within the maximum period of late payment law (Thousands of euros)	51,385	66,838
Percentage over the total monetary value of payments to suppliers	27%	32%

Table 70: Payment practices

The data included in the above table regarding payments to suppliers made by the parent company and other Spanish subsidiaries refer to those which, by their nature, qualify as trade creditors arising from debts with suppliers of goods and services. Accordingly, they include data relating to the items "Trade creditors and other payables – Suppliers" within current liabilities in the accompanying consolidated statement of financial position.

"Average payment period to suppliers" shall be understood as the measure of the payment period or delay in settling trade payables. This "average payment period to suppliers" is calculated as the ratio where the numerator is the sum of the ratio of paid transactions multiplied by the total amount of payments made, plus the ratio of outstanding transactions multiplied by the total amount of payments outstanding; and the denominator is the total amount of payments made plus the total amount of payments outstanding. In this regard, payment terms are determined by each business unit rather than by purchasing categories, with the Group adapting different payment methods in accordance with local regulations.

The ratio of paid transactions is calculated as the quotient where the numerator is the sum of the products corresponding to the amounts paid multiplied by the number of days taken to pay (the difference between the calendar days elapsed from the end of the maximum legal payment period to the actual payment date of the transaction), and the denominator is the total amount of payments made.

Similarly, the ratio of outstanding transactions corresponds to the quotient where the numerator is the sum of the products corresponding to the amounts outstanding multiplied by the number of days outstanding (the difference between the calendar days elapsed from the end of the maximum legal payment period to the reporting date of the annual accounts), and the denominator is the total amount of payments outstanding.

The maximum legal payment period applicable to companies domiciled in Spain, in accordance with Law 11/2013 of 26 July on measures to combat late payment in commercial transactions, and pursuant to the transitional provisions set out in Law 15/2010 of 5 July, is 30 days (unless the conditions established therein are met, which would allow this maximum payment period to be extended to 60 days). The Tubacex Group has implemented measures to continue aligning its average payment period with the limits established under current legislation.

As at December 2024 and 2025 year-end, there were no pending legal proceedings related to delays in payments.

Governance targets and the main related projects are set out in the table below. It should be noted that no actions have been undertaken to establish corrective measures for individuals adversely affected by material actual impacts, as no cases requiring direct intervention of this kind have been identified.

PILLAR 4: Ethics and transparency

Action: ESG Key Performance Indicators
Target to be achieved and relationship with policies: Improve data quality, traceability, and reliability, with a specific consolidation system for the ESG field. **Scope of action**: The entire Group. **Reference value**: N/A **Base year**: 2022 **Time horizon**: 2025 **Validation:** Validated by Tubacex

Actions / Initiatives	**Parameter to be measured and definition**	**Significant methodologies and hypotheses**	**Performance against target**
- Consolidation of ESG reporting by incorporating new tools. - Definition of ESG indicator dashboard and selection of indicators linked to variable remuneration. Inclusion of two ESG indicators in long-term incentives for the Executive Committee and key managers	Completed YES/NO	N/A	- The target has been achieved; therefore, performance stands at 100%. The trend has been as expected, with the project completed in 2024. Nevertheless, progress has continued in technological improvements for data visualisation and exploitation. - The target has been achieved; therefore, performance stands at 100%, with its status and effectiveness reviewed annually.

Action: Corporate risk model and ESG risks
Target to be achieved and relationship with policies: Identify and incorporate those related to sustainability into the corporate risk model
Scope of action: The entire Group.
Reference value*:* N/A
Base year: 2022
Time horizon: 2025
Validation: Validated by Tubacex

Actions / Initiatives	**Parameter to be measured and definition**	**Significant methodologies and hypotheses**	**Performance against target**
- Climate and transition risks. Over the last two years, environmental risks and opportunities have been identified using specific methodologies. The most significant risks have been transferred to the corporate risk map. - Materiality analysis. The aforementioned risks have been duly incorporated into the Group's materiality analysis, prepared in accordance with the EFRAG guidance and CSRD recommendations. - Sustainability information monitoring and control model. In addition, a sustainability information monitoring and control system has been implemented, establishing controls on material aspects and strengthening the robustness of the consolidation and control system.	Completed YES/NO	N/A	The target was reached, so the performance of the target was 100%.

Table 8: Actions and goals in the field of governance

These targets are aligned with the commitments set out in the Sustainability Policy and detailed in Annex III on Corporate Policies.

4.2 Cybersecurity

4.2.1 Policies adopted to manage material sustainability matters (MDR-P)

(ESRS 2 65a-65b-65c)

The Tubacex Information Security Policy, approved by the Board of Directors, reflects the organisation's firm commitment to defining and establishing clear guidelines, as well as providing the necessary support to manage information security. This is carried out in compliance with internal requirements, legal standards and applicable regulations, with the aim of improving the quality of services provided to its customers. Furthermore, this policy seeks to safeguard the Company's information assets and ensure the privacy of customers, partners, suppliers and employees.

To this end, the following objectives are established:

- To implement the necessary measures and procedures to protect the three fundamental pillars of information security:
    - o Confidentiality: Ensuring that only authorised users have access to data and systems.
    - o Integrity: Safeguarding the accuracy and reliability of information and systems against alteration, loss or destruction, whether accidental or intentional.
    - o Availability: Ensuring that information and systems are accessible and operational when required.
- To disseminate the regulations set out in this policy in order to promote a culture of awareness and training in information security among all Tubacex employees, thereby enabling the adoption of appropriate practices in the performance of their duties.
- To consider the Information Security Policy as the main instrument for ensuring effective protection, promoting and guaranteeing its compliance across all organisational services.

4.2.2 MDR-A, MDR-M, MDR-T Actions and resources, parameters and monitoring of the effectiveness of policies and actions in relation to material sustainability matters

(ESRS 2 68a-68b-68c-68d-75-77a-77b-80a-80b-80c-80d-80e-80f-80i-80j)

The list of projects developed by Tubacex in relation to cybersecurity is set out below. All of these projects have been completed and are therefore currently operational.

Targets and parameters are reviewed annually to verify whether they remain relevant. In 2025, there has been no significant change in the Company's performance in achieving any of its targets. Likewise, no actions have been undertaken to establish corrective measures for individuals adversely affected by material actual impacts, as no cases requiring direct intervention of this kind have been identified.

Action: Cybersecurity. Privileged Access Management System

Target to be achieved and relationship with policies*:* Implementation of a Privileged Access Management System (PAM) to prevent unauthorized access to systems that reaches 100% of companies. Information Security Policy.

Scope of action*:* The entire Group.

Reference value*:* 0%

Base year*:* 2025

Time horizon*:* 2025

Validation: Validated by Tubacex

Actions / Initiatives	Parameter to be measured and definition	Significant methodologies and hypotheses	Performance against target
- Implementation of two-factor authentication using a smartphone or physical device connected to the computer to prevent credential theft. - Implementation of a SIEM that centralizes the reception of security alerts and events from multiple platforms.	% of plants in which it has been implanted	The PAM project has been defined using risk analysis methodologies and cybersecurity best practices. Significant assumptions are based on system criticality, the potential impact of unauthorised privileged access, and reasonable and conservative assumptions derived from internal risk assessments and previous audits.	**2025 result:** Implemented in 100% of plants. The trend was as expected and the target has been achieved.

Action: Cybersecurity Project. User Work Environment Protection Project
Target to be achieved and relationship with the policies*:* Protection of the User's Work Environment consisting of the implementation in 100% of the plants of an intelligent system for detecting attack patterns. Information Security Policy. **Scope of action***:* The entire Group. **Reference value***:* 0 (not implemented) **Base year***:* 2024 **Time horizon***:* 2026 **Validation***:* Validated by Tubacex

Actions / Initiatives	Parameter to be measured and definition	Significant methodologies and hypotheses	Performance against target
- Implementation of a SIEM that centralizes the reception of security alerts and events from multiple platforms. - Deployment of advanced sensors and an intelligent system to identify attack patterns and detect threats on the network.	Implemented Yes/No	The project has been defined through risk analysis methodologies associated with the use of mobile devices and laptops outside the corporate network, aligned with good cybersecurity practices. Significant hypotheses are based on the increase in mobile working, greater exposure to threats in external environments and conservative assumptions about the potential impact of security incidents, reviewed internally.	**2025 result:** The SIEM system was deployed in 2024, while attacker detection probes were implemented in 2025 at the Data Centre, Llodio, Amurrio, SBER, Salem and Durant.

Table 9: Actions and goals related to cybersecurity

These projects have required the development of the following actions, all of which are aligned with the Tubacex Information Security Policy and are being implemented between 2025 and 2030, covering the needs of the entire Group:

- Implementation of multi-factor authentication using a smartphone or a physical device connected to the computer to prevent credential theft.
- Implementation of a SIEM (Security Information and Event Management) system to centralise the collection of security alerts and events from multiple platforms.
- Deployment of advanced sensors and an intelligent system to identify attack patterns and detect threats across the network.

4.3 Innovation

The organisation's innovation strategy is focused on driving the energy transition and the decarbonisation of industry through the development of new businesses, technologies and solutions aligned with its corporate policies on sustainability, responsible growth and diversification towards low-carbon activities.

4.3.1 Policies adopted to manage material sustainability matters (MDR-P)

(ESRS 2 62)

The Environmental and Climate Action Policy sets out several of the commitments underpinning the innovation strategy, explicitly including the following:

- To continuously improve energy performance by promoting efficiency, the rational use of energy and technological innovation.
- To actively participate in energy transition and industrial decarbonisation initiatives.
- To promote collaboration with universities, technology centres and customers in order to advance circular and low-carbon solutions.
- To foster research and development of clean technologies, sustainable materials and innovative solutions to reduce environmental footprint.

Within this framework, Tubacex is developing a series of projects that drive the advancement of innovative solutions for the energy transition.

4.3.2 MDR-A, MDR-M, MDR-T Actions and resources, parameters and monitoring of the effectiveness of policies and actions in relation to material sustainability matters

(ESRS 2 68a-68b-68c-68d-75-77a-77b-80a-80b-80c-80d-80e-80f-80j)

The most relevant actions carried out in the field of innovation, both implemented and planned for the medium term, are as follows:

- Circular economy: Promotion of new business activities through the development of proprietary technologies and collaboration with start-ups, with the aim of fostering circular and sustainable business models.
- Hydrogen and decarbonised mobility: Development of new businesses linked to the manufacture of components and materials for electrolysers, including integrated services ranging from co-design to logistics, as well as the industrialisation of materials for hydrogen processing and transport.
- Decarbonisation of the steel industry: Implementation of high-impact technological solutions aimed at reducing gas consumption by 60% by 2030, contributing to emissions reduction in key industrial sources.
- CO_2 capture and storage: Development of a specific and differentiated portfolio of products and services for carbon capture and storage technologies, aligned with climate change mitigation policies.
- Green ammonia and urea: Increase in sales of proprietary products to the fertiliser sector.
- Biofuels, synthetic fuels and bioplastics: Growth in sales associated with new projects involving sustainable fuels and materials.
- Nuclear energy: Technical collaboration on small modular reactor (SMR) projects, contributing to the development of low-emission and highly stable energy solutions.
- Participation in regional decarbonisation initiatives, such as the Hard2Zero project, aimed at developing a regional decarbonisation infrastructure that would, in the long term, enable progress towards the full decarbonisation of the Llodio and Amurrio plants. In addition, Tubacex is part of the Basque Hydrogen

Corridor, an initiative designed to promote the deployment of hydrogen in the Basque Country, covering its production, consumption and technological development.

These projects have an impact at Group level and are aligned with the Integrated Environmental and Climate Action Policy (see Annex III).

It should be noted that no actions have been undertaken to establish corrective measures for individuals adversely affected by material actual impacts, as no cases requiring direct intervention of this kind have been identified.

PILLAR 2: Innovative Solutions

Action: Project of innovative solutions for the energy transition

Target to be achieved and relationship with policies*:* To ensure that 80% of R&D is allocated to the energy transition. Support the diversification of the business towards new sectors aligned with the energy transition. The policy of the environment and climate action.

Scope of action*:* The entire Group.

Reference value*:* 62% innovation efforts in energy transition

Base year*:* 2022

Time horizon*:* 2025

Validation*:* Validated by Tubacex

Actions / Initiatives	Parameter to be measured and definition	Significant methodologies and hypotheses	Performance against target
- Circular economy. Promotion of new business activities through the development of proprietary technologies and collaboration with startups, with the aim of promoting circular and sustainable business models - Hydrogen and decarbonised mobility. Development of new businesses linked to the manufacture of components and materials for electrolyzers, including comprehensive services from co-design to logistics, as well as the industrialization of materials for the processing and transport of hydrogen - Decarbonisation of the steel industry. Implementation of high-impact technological solutions aimed at reducing gas consumption by 60% by 2030, contributing to the reduction of emissions in the main industrial centres - CO_2 capture and storage. Development of a specific and differentiated offer of products and services for carbon capture and storage technologies, aligned with climate change mitigation policies - Ammonia and green urea. Increase in sales of own products to the fertiliser sector	% of R&D&I efforts aimed at energy transition	(R&D&I resources allocated to energy transition / Total R&D&I resources)	**2024 result**: 31% of R&D efforts were allocated to the energy transition. The trend is lower than expected and is expected to increase in 2025. **2025 result:** 51% of R&D efforts were allocated to projects linked to the energy transition. Despite the increase from the previous year, the index is below the target.

Actions / Initiatives	Parameter to be measured and definition	Significant methodologies and hypotheses	Performance against target
- Biofuels, synthetic fuels and bioplastics. Sales growth associated with new sustainable fuels and materials projects - Nuclear energy. Technical collaboration with small modular reactor (SMR) projects, contributing to the development of low-emission and high-stability energy solutions - Participation in regional decarbonisation initiatives, such as the Hard2Zero project, aimed at developing a regional decarbonisation infrastructure that would allow, in the long term, progress towards the complete decarbonisation of the Llodio and Amurrio plants. Tubacex is also part of the Basque Hydrogen Corridor, an initiative aimed at promoting the deployment of hydrogen in the Basque Country, covering its areas of production, consumption and technological development.			

Table 10: Innovation-related actions and goals

- During the 2024 financial year, the financial resources deployed amounted to €3,577,973 in CapEx and €683,365 in OpEx, mainly allocated to projects aimed at strengthening the corporate governance model, cybersecurity and innovation, including improvements to systems, processes and internal control mechanisms. In 2025, the resources deployed amount to €5,652,299 in CapEx and €753,913 in OpEx. These items are integrated into the Group's general investment plans and ordinary management activities and do not correspond to extraordinary actions, but rather to the ongoing evolution and progressive strengthening of the corporate governance framework.

SECTION II: Requirements of Law 11/2018 on Non-Finantial Statements (EINF)

1.1 Table of contents

NFIS Requirement		ESRS	DR (DP)
General	Information Reporting Framework	ESRS 2	BP-1
Management approach	Understanding the Policies That Apply	E1 / G1 / S1 / S4	E1-2, S1-1, G1-1, ESRS 2 MDR-P
	Policy outcome	ESRS2 / E1 / G1 / S1 / S4	E1-3, G1-2 a 4, S1-2 a 16, ESRS 2 MDR-A, ESRS 2 MDR-M
	Main risks related to these issues related to the activities of the group	ESRS 2	SBM-3
Business model			
Description of the group's business model	Description of the business model.	ESRS 2	SBM-1
	Geographical presence.	ESRS 2	SBM-1
	Objectives and strategies.	ESRS 2	SBM-1
	Key factors and trends affecting future performance.	ESRS 1	SBM-1
Information on environmental issues			
General	Current and foreseeable effects of the company's activities on the environment and, where applicable, health and safety	ESRS 2	IRO-1
	Environmental assessment or certification procedures.	-	-
	Resources dedicated to the prevention of environmental risks.	ESRS 2	MDR-A
	Application of the precautionary principle.	-	-
	Number of provisions and guarantees for environmental risks	-	-
Pollution	Measures to prevent, reduce or remediate carbon emissions that seriously affect the environment; considering any form of activity-specific air pollution, including noise and light pollution	E1 / ESRS 2	E1-2 / E1-3 / IRO-1
Circular economy and waste prevention and management	Prevention, recycling, reuse, other forms of waste recovery and disposal measures	E5	E5-2
	Actions to combat food waste	NA	NA

NFIS Requirement		ESRS	DR (DP)
Sustainable use of resources	Water consumption and water supply in accordance with local constraints;	E3	E3-4 (28a; 28b)
	Consumption of raw materials and measures taken to improve the efficiency of their use	E5	E5-2 / E5-4 (31a)
	Direct and indirect energy consumption, measures taken to improve energy efficiency and the use of renewable energies	E1	E1-2 / E1-5 (37)
Climate change	Greenhouse gas (GHG) emissions (the significant elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the SDG and services it produces)	E1	E1-6
	Measures taken to adapt to the consequences of climate change	E1	E1-2
	The reduction targets voluntarily established in the medium and long term to reduce greenhouse gas emissions and the means implemented to this end	E1	E1-4
Protecting biodiversity	Measures taken to preserve or restore biodiversity	E4	E4-3
	Impacts caused by activities or operations in protected areas	E4	E4-5
Information on social and personal issues			
Employment	Total number and breakdown of employees by sex, age, country and professional classification.	S1	S1-6, S1-9
	Total number and distribution of employment contract modalities	S1	S1-6
	Annual average of indefinite, temporary and part-time contracts by sex, age and professional classification.	S1	S1-6
	Number of dismissals by sex, age and professional classification.	-	-
	Average remuneration and its evolution disaggregated by sex, age and professional classification or equal value	-	-
	Wage gap	S1	S1-16 (97a)
	Remuneration of equal or average jobs in the company	-	-

NFIS Requirement		ESRS	DR (DP)
	Average remuneration of directors and executives, including variable remuneration, allowances, severance payments, payment to long-term savings pension schemes and any other perception disaggregated by sex	-	-
	Implementation of work disconnection policies	S1	S1-1 (18; 19) / S1-15
	Employees with disabilities	-	-
	Organization of working time	S1	S1-1 (18; 19) / S1-4
	Number of hours of absenteeism	-	-
Organization of work	Measures aimed at facilitating the enjoyment of work-life balance and encouraging the co-responsible exercise of these by both parents	-	-
	Occupational health and safety conditions	S1	S1-1 (DP. 23)
Health and safety	Accidents at work, in particular their frequency and severity, [...] disaggregated by sex	S1	S1-14
	Occupational diseases, disaggregated by sex	S1	S1-14
	Organization of social dialogue, including procedures for informing, consulting and negotiating with staff	S1	S1-2 / S1-3
Social Relationships	Percentage of employees covered by collective agreement by country	S1	S1-8
	Assessment of collective agreements, particularly in the field of health and safety at work	-	-
	Policies implemented in the field of training	-	-
Training	Total number of training hours by professional category	-	-
Accessibility	Universal accessibility for people with disabilities.	-	-
	Measures taken to promote equal treatment and opportunities for women and men	-	-
Equality	Equality plans	-	-
	Measures taken to promote employment	-	-

NFIS Requirement		ESRS	DR (DP)
	Protocols against sexual and gender-based harassment	ESRS 1	S1-1 (24a; 24b)
	Integration and universal accessibility for persons with disabilities	-	-
	Policy against all types of discrimination and, where appropriate, diversity management	ESRS 1	S1-1 (24)
Information on respect for human rights			
Human rights	Implementation of human rights due diligence procedures	ESRS 2	GOV-4
	Prevention of risks of human rights violations and, where appropriate, measures to mitigate, manage and remedy possible abuses committed	ESRS 2 / S1	S1-1 (20 c.)/ S2-1 (17 c.) / S3-1 (17 c.)
	Complaints of human rights violations	S1	S1-17 / S2-4 (36) / S3-4 (36) /
	Promotion of and enforcement of the provisions of the fundamental conventions of the International Labour Organization related to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour	S1	S1-1 (20; 21; 22) / S2-1 (17; 18; 19) / S3-1 (17; 18; 19)
Information on the fight against corruption and bribery			
Corruption and bribery	Measures taken to prevent corruption and bribery	G1	G1-3
	Anti-money laundering measures	-	-
	Contributions to foundations and non-profit entities	-	-
Company Information			
The company's commitments to sustainable development	Impact of the company's activity on employment and local development.	-	-
	Impact of the company's activity on local populations and territory	-	-
	Relations with local community actors and the modalities of dialogue with them	ESRS 2	SBM-2
	Partnership or sponsorship actions.	-	

NFIS Requirement		ESRS	DR (DP)
Subcontracting and suppliers	Inclusion of social, gender equality and environmental issues in procurement policy	G1	G1-2 (15 b.)
	Consideration in relations with suppliers and subcontractors of their social and environmental responsibility	G1	G1-2 (15 a.m.)
	Monitoring and audit systems and their results	-	-
Consumers	Measures for the health and safety of consumers	-	-
	Complaint systems, complaints received and resolution of the same.	-	-
Tax Information	Benefits obtained country by country	-	-
	Taxes on benefits paid	-	-
	Public subsidies received	-	-

1.2 Information on environmental matters

1.2.1 General

Environmental assessment or certification procedures (GRI 3-3)

TUBACEX has implemented an ISO 14001-certified system at its main production plants, with its Abu Dhabi plant being the most recent to obtain this certification. The TTA, Awaji Thailand and certain NTS Group facilities are not included within the scope of certification. Nevertheless, these plants have voluntary systems in place aimed at controlling processes in order to prevent and minimise the environmental impacts of their activities. As a result, the vast majority of the production process is supported by an accredited environmental management system.

During 2025, there were no sanctioning proceedings within the framework of the integrated environmental authorisation, and proactive and fluid communication with the competent authorities has been maintained.

Furthermore, due to the nature of the activities of TTI-ACERALAVA, which fall under the scope of the Integrated Pollution Prevention and Control Directive (IPPC Directive), implemented in Spain through Royal Legislative Decree 1/2016 of 16 December, the company holds Integrated Environmental Authorisations. These authorisations entail the monitoring of all environmental aspects of the activity through surveillance plans and periodic reporting to the authorities within a framework of transparency.

Resources dedicated to the prevention of environmental risks [GRI 2-12] and application of the precautionary principle [GRI 2-23]

All plants certified under ISO 14001 have a Quality and Environment Manager responsible for ensuring the implementation of environmental management processes. These professionals monitor and control the Company's activities from an environmental perspective, ensuring regulatory compliance and identifying opportunities for improvement.

During the financial year ended 31 December 2025, the Group maintained investments with an approximate net value of EUR 2,992 thousand (EUR 1,755 thousand in 2024) and incurred environmental expenditure amounting to EUR 3,301 thousand (EUR 2,909 thousand in 2024).

Provisions and guarantees for environmental risks [GRI 307-1]

In 2025, the Group maintains a provision of EUR 1,327 thousand (EUR 1,424 thousand in 2024) under "Non-current provisions" in the consolidated statement of financial position, corresponding to one of its subsidiaries domiciled in the United States of America.

During 2024 and 2025, the Company did not receive any sanctions or fines for environmental reasons.

Since 2000, TUBACEX has maintained environmental liability insurance covering potential risks associated with the industrial activities of all its plants, with coverage of up to EUR 12 million.

*amount assessed by an independent expert and recognised under "non-current provisions" in the consolidated statement of financial position.

1.3 Information on social and personnel matters

1.3.1 Employment

Total number and distribution of employees by gender, age, country and professional category

	2024			2025		
	Men	Women		Men	Women	
Under 30 years old	255.00	45.00	***Under 30 years old***	255.00	45.00	***Under 30 years old***
Between 30 and 50 years old	1,460.00	236.00	***Between 30 and 50 years old***	1,460.00	236.00	***Between 30 and 50 years old***
Over 50 years old	656.00	114.00	***Over 50 years old***	656.00	114.00	***Over 50 years old***
TOTAL	**2,371.00**	**395.00**	***TOTAL***	**2,371.00**	**395.00**	***TOTAL***

In the current financial year, the organisation has carried out a review of the classification of professional categories with the aim of enhancing the accuracy and transparency of the information presented. In this regard, it has been decided to disaggregate the category of "Technicians and professionals", which in previous years also included administrative and support staff, into two distinct categories: "Technicians and professionals" and "Administration and support".

The new "Administration and support" category includes employees performing operational and administrative support functions, including, among others, roles in security, reception and other support positions. Consequently, throughout this document, whenever reference is made to professional categories, the information will be presented in two tables: one following the classification used in previous years and another in accordance with the new classification, in order to facilitate comparability and the correct interpretation of the data.

	2024			2025		
	Men	Women	Total	Men	Women	Total
Guidance	178.00	47.00	225.00	177.00	48.00	225.00
Middle managers and supervisors	215.00	18.00	233.00	226.00	22.00	248.00
Technicians & Professionals / Administration & Support	302.00	208.00	510.00	327.00	202.00	529.00
Operations Staff	1,676.00	122.00	1,798.00	1,673.00	111.00	1,784.00
TOTAL	**2,371.00**	**395.00**	**2,766.00**	**2,403.00**	**383.00**	**2,786.00**

	2024			2025		
	Men	Women	Total	Men	Women	Total
Guidance	178.00	47.00	225.00	177.00	48.00	225.00
Middle managers and supervisors	215.00	18.00	233.00	226.00	22.00	248.00
Technicians and professionals	274.00	154.00	428.00	288.00	129.00	417.00
Administration and support	28.00	54.00	82.00	39.00	73.00	112.00
Operations Staff	1,676.00	122.00	1,798.00	1,673.00	111.00	1,784.00
TOTAL	**2,371.00**	**395.00**	**2,766.00**	**2,403.00**	**383.00**	**2,786.00**

This table includes, under the category "Management", all individuals performing managerial functions within the Group. In the table of categories presented in the financial information, the category "Senior management" includes members of the Executive Committee, while the category "Middle management and supervisors" includes individuals performing managerial functions who are not members of the Executive Committee, as well as supervisors.

Average annual number of permanent, temporary and part-time contracts by gender and professional category

	2024				2025			
	Under 30 years old	Between 30 and 50 years old	Over 50 years old	Total	Under 30 years old	Between 30 and 50 years old	Over 50 years old	Total
Indefinite contracts	348.77	1,580.63	551.87	2,481.27	298.85	1,578.20	701.85	2,578.90
Temporary contracts	43.69	119.81	21.59	185.09	23.56	105.26	35.06	163.88
TOTAL by contract type	**392.46**	**1,700.44**	**573.46**	**2,666.36**	**322.41**	**1,683.46**	**736.91**	**2,742.78**
Part-time working hours	0.56	5.93	7.32	13.81	0.02	7.95	14.43	22.40

Number of dismissals by gender, age and professional category.

Number of dismissals by gender	*2024*	*2025*
Men	112	133
Women	25	16
TOTAL	**137**	**149**

Number of dismissals by age	2024	*2025*
Under 30 years old	31	30
Between 30 and 50 years old	71	80
Over 50 years old	35	39
TOTAL	**137**	**149**

Number of dismissals by professional classification	2024	*2025*
Guidance	11	10
Middle managers and supervisors	3	10
Technicians & Professionals/ Administration & Support	27	22
Operations Staff	96	107
TOTAL	**137**	**149**

*Includes 100% of the Group's companies.
*This table reflects exclusively involuntary departures. It does not include the expiry of temporary contracts, voluntary resignations, leaves of absence, retirements, etc.

Number of dismissals by professional classification	2024	*2025*
Guidance	11	10
Middle managers and supervisors	3	10
Technicians and professionals	17	17
Administration and support	10	5
Operations Staff	96	107
TOTAL	**137**	**149**

*Includes 100% of the Group's companies.
*This table reflects exclusively involuntary departures. It does not include the expiry of temporary contracts, voluntary resignations, leaves of absence, retirements, etc.

Average remuneration and its evolution, broken down by gender, age and professional category or work of equal value

Average remuneration (euros) by gender	*2024*	*2025*
Men	51,924	49,078
Women	45,962	46,400
TOTAL	**50,921**	48,716

Average remuneration (euros) by age	*2024*	*2025*
Under 30 years old	28,523	31,804
Between 30 and 50 years old	45,895	45,951
Over 50 years old	63,406	64,343

*Includes 100% of the Group's companies.

Average remuneration shows differences compared to the previous year as a result of various dynamics related to growth, the integration of companies and the restructuring of the Group itself.

The average salary of the Management category has increased significantly as a result of the incorporation into this category of intermediate structures required for the integration of the Company and the adaptation of management to an increasingly international environment with greater mobility. The fact that the year's results supported the payment of variable remuneration has also reinforced this increase.

As in the previous year, there has been a continued strong recruitment of specialised profiles in high-remuneration environments in activities that differ significantly from those traditionally carried out. There has also been an increase in the recruitment of supervisory and middle management positions, particularly within companies recently incorporated into the Group. This has resulted in a higher number of employees and, together with growth in certain locations and the rejuvenation of the workforce, has led to a reduction in the average remuneration of this group.

Average remuneration is calculated on the basis of the gross remuneration received by Tubacex Group employees during the financial year, including all components. For the calculation of average remuneration and the gender pay gap for the 2025 financial year, Senior Management has been included, in line with evolving applicable regulations. This criterion differs from the previous financial year, in which this group was not included within the scope of calculation.

Average remuneration (euros) by professional category	*2024*	*2025*
Guidance	101,376	116,648
Middle managers and supervisors	53,443	53,415
Technicians and professionals	49,045	47,064
Operations Staff	39,902	40,177

Average remuneration (euros) by professional category	*2025*
Guidance	116,648
Middle managers and supervisors	53,415
Technicians and professionals	47,496
Administration and support	45,371
Operations Staff	40,177

As can be observed in the workforce growth tables, the greatest increase has taken place in countries where average remuneration is lower. An increase in remuneration can be seen across all categories, with that of operations

personnel being the most moderate, as the growth of this group has occurred predominantly in countries where the average remuneration for this category is lower.

Average remuneration of directors and executives

As at 31 December 2025, the Board of Directors is composed of seven men and four women. The average remuneration of members of the Board of Directors in the 2025 financial year amounted to EUR 266,983 for men and EUR 123,252 for women, compared to EUR 172.9 thousand for men and EUR 89.2 thousand for women in 2024. The difference is due to the fact that the roles of Chairman and Chief Executive Officer, which carry additional or higher remuneration components to compensate for their representative and executive duties, respectively, are held within the male group (1). For further detail on directors' remuneration, the breakdown and individual disclosure are provided in the Annual Report on Directors' Remuneration (available on the CNMV website).

With regard to the average remuneration of the Executive Committee (2), composed of 10 men and 2 women, this amounted to EUR 245.59 thousand for the 2025 financial year, compared to EUR 332.36 thousand in 2024.

(1) Variable remuneration components exclusively associated with executive roles have been excluded from the calculation of average remuneration.

(2) For the calculation of the average remuneration of Senior Management, fixed remuneration and variable remuneration accrued for the 2025 financial year have been considered, excluding other types of long-term incentives that are applied individually depending on the date of appointment.

Employees with disabilities

TUBACEX maintains a firm commitment to the integration of people with diverse talent within the Group. All plants comply with the applicable regulations in each country regarding disability, whether in terms of direct employment, the application of alternative measures and/or accessibility.

In the case of plants located in Spain, compliance with the General Disability Law is currently achieved through alternative measures, mainly through the procurement of goods and services from Special Employment Centres, although active efforts are being made to strengthen the commitment to direct labour integration.

Similarly, plants located in countries such as the United States or Italy are subject to specific legal requirements regarding the employment of persons with disabilities. In other Group companies, such as NTS, although there is no specific legal requirement, a corporate social responsibility programme is in place that gives priority to this group.

Overall, the number of employees with disabilities within the Group as at year-end 2025 amounts to 27, compared to 20 recorded at the end of 2024.

Working time organisation

The Tubacex Group ensures compliance with rest breaks and rest periods as established both by applicable legislation and by the relevant collective bargaining agreements. In cases where employees are not covered by a collective agreement, the Group applies flexible criteria adapted to the characteristics of each role.

Working hours, calculated on an annual basis, are consistent for all employees within each company. Therefore, regardless of the specific nature of each role, all employees work the same annual hours and benefit from equal rest breaks and rest periods.

Number of hours of absenteeism [GRI 403-9]

	2024	*2025*
Hours lost due to accident	13,578	13,296
Hours lost due to illness	202,577	224,637
Hours lost other [1]	51,025	52,812
Total Hours Lost	**267,180**	**290,747**
% Absenteeism [2]	**4.87%**	**5.40%**

[1] Includes mainly paid leave and trade union hours.
[2] Total number of hours lost out of total theoretical working hours.
**Includes 100% of the Group's companies.*

The main causes of absenteeism within the Group are non-occupational illness and paid leave taken by employees. For the calculation of this indicator, the number of hours lost due to occupational accidents, hours not worked due to non-occupational illness, statutory paid leave and hours used by trade union representatives in the performance of their representative duties are taken into account.

1.3.2 Work organization

Measures aimed at facilitating work-life balance and promoting shared responsibility between both parents [GRI 3-3, GRI 403-6]

TUBACEX guarantees access to rights and leave related to the reconciliation of work, personal and family life for all employees, without distinction of gender, and promotes their use in accordance with the context and characteristics of each role.

In production plants, work-life balance measures are primarily implemented through the extension of the maximum age for eligibility for parental leave for childcare, as well as through reduced working hours and flexible working arrangements. In office environments, a system of flexible start and finish times is applied, facilitating an appropriate balance between professional, personal and family responsibilities.

Additionally, some collective bargaining agreements expressly include measures aimed at promoting shared responsibility, and the Group has Equality Plans in place in accordance with current legal requirements (in Spain: TTI and ACERÁLAVA). Beyond the provisions established in the collective agreements applicable at each site, TUBACEX assesses situations on a case-by-case basis, with the aim of providing the necessary flexibility to support work-life balance.

1.3.3 Health and Safety

Occupational accidents (frequency and severity), disaggregated by gender (GRI 403-9)

	2024			2025		
	Men	Women	Total	Men	Women	Total
Lost-time accidents	47	7	54	50	5	55
No-lost-time accidents	84	10	94	88	5	93

	2024			2025		
	Men	Women	Total	Men	Women	Total
Total number of accidents	131	17	148	138	10	148
Occupational diseases	7	1	8	1	1	2
Frequency rate [1]	**9.34**	**9.10**	**9.39**	**10.34**	**7.07**	**9.93**
Severity rate [2]	**0.23**	**0.44**	**0.26**	**0.26**	**0.24**	**0.26**

(1) Number of lost-time accidents per million hours worked.
(2) Number of days lost due to lost-time accidents divided by the number of hours worked, per thousand.
Includes 100% of the Group's companies.

1.3.4 Social relations

Organisation of social dialogue, including procedures for informing, consulting and negotiating with employees

TUBACEX guarantees respect for labour rights recognised under applicable legislation in all the countries in which it operates, including freedom of association and the right to collective bargaining. Trade union representation and the conditions governing union activity are regulated through the applicable collective bargaining agreements, resulting from negotiation processes conducted in good faith and in compliance with current regulations.

The Group not only complies with, but in some cases exceeds, legal standards at its workplaces, adapting working conditions to the different contexts in which it operates. Furthermore, in countries where collective bargaining mechanisms do not exist, such as the United Arab Emirates or Saudi Arabia, TUBACEX ensures respect for labour rights beyond the minimum legal requirements established.

Society	Tipo de convenio
TTI	Company-specific collective agreement
ACERÁLAVA	Company-specific collective agreement
TTA	Company-specific collective agreement
TSS	Metal Industry Agreement of Álava
TX SERVICES	Steel and Metal Industry Agreement of Cantabria
TUBACOAT	General Collective Agreement of the Chemical Industry
Tubacex Management Services	Offices and Commercial Premises Agreement of Bizkaia
Tubacex, S.A.	Offices and Commercial Premises Agreement of Bizkaia

Society	Tipo de convenio
Tubacex Innovation, IAE	General Collective Agreement of the Chemical Industry
TAT (Thailand)	Company-specific collective agreement
IBF (Italy)	Sectoral Agreement (Metalworking industry)
SBER (Austria)	Sectoral Agreement (Industry)
SBT (Austria)	Sectoral Agreement (Industry)
PROMET (Norway)	Sectoral Agreement (Industry)
SALEM TUBE (United States)	Company-specific collective agreement
TBX Newco Spain	Offices and Commercial Premises Agreement of Bizkaia
TBX Spain Assets	Offices and Commercial Premises Agreement of Bizkaia

Percentage of employees covered by collective bargaining agreements by country

	2024	2025
Spain	100%	100%
Austria	100%	100%
United States	38%	23%
United Arab Emirates	0%	0%
India	0%	0%
Italy	100%	100%
Saudi Arabia	0%	0%
Thailand	100%	100%
Norway	96%	100%
Canada	0%	0%
Brazil	100%	79%
Singapore	0%	0%
Guyana	0%	0%
France	100%	100%
China	0%	0%
Netherlands	0%	0%

Germany	100%	100%
Korea	0%	0%
United Kingdom	-	0%
Total	**63%**	**60%**

**Includes 100% of the Group's companies.*

Overview of collective bargaining agreements, particularly in the field of occupational health and safety

With regard to collective bargaining agreements, and particularly in the field of occupational health and safety, each of the Spanish plants has a Health and Safety Committee composed of representatives from the Works Council. Some of these agreements include specific health and safety provisions within their clauses.

For the rest of the Group, there are no Health and Safety Committees in other countries. Collective bargaining agreements (almost entirely local in nature) regulate all aspects of labour relations as a result of local collective bargaining processes. These agreements address all aspects of the employer–employee relationship. In accordance with applicable legislation, Health and Safety Committees provide mechanisms for consultation and participation of TUBACEX employees.

1.3.5 Training

Total number of training hours by professional category

The training hours by professional category for 2025 are detailed below:

Training hours	2024	2025
Guidance	2,401	5,672
Middle managers and supervisors	3,620	5,242
Technicians and professionals	4,218	9,261
Administration and support	715	2,055
Operations Staff	21,882	37,053
Total hours of training	**32,836**	**59,283**
Average number of training hours per employee	**11.87**	**21.28**

**Includes 100% of the Group's companies.*

1.3.6 Accessibility

Universal accessibility for persons with disabilities [GRI 3-3]

TUBACEX complies with accessibility regulations in each of the countries in which it operates. Accordingly, all TUBACEX facilities are fully adapted for persons with disabilities.

1.3.7 Equality

Measures adopted to promote equal treatment and opportunities between men and women [GRI 3-3, GRI 405-1]

With regard to the promotion of equal opportunities, TUBACEX is committed to diverse talent, fostering equal opportunities. The Company, shaped by its industrial origins, has 13.75% women in its workforce. Despite this, with the gradual incorporation of professionals, it has achieved a level of representation of 39.88% in the "Technicians and professionals" category and 21.49% in the Management category.

Within its Equality, non-discrimination and inclusion policy, the organisation has established a specific position on equality matters. Recruitment and selection processes at TUBACEX are carried out based on the alignment of candidates' technical and professional competencies and qualities with the functions to be performed, with the aim at all times of attracting the best talent and retaining it in an objective manner.

Equality plans [GRI 3-3]

TUBACEX has promoted policies to foster and promote equal treatment and opportunities between men and women, through the development of equality plans at its most representative plants, which set out the objectives, strategies and practices to be adopted. The plants in the Basque Country approved their equality plan in 2023. This equality plan includes an Equality Committee composed of Company representatives and employee representatives, which is responsible for the implementation, monitoring and evaluation of the Plan. In other plants where such plans are not in place, there are protocols for action against psychological or sexual harassment or harassment on the grounds of sex and/or physical violence (TSS), specific manuals with dedicated sections focused on non-discrimination (NTS Group), specific non-discrimination policies (Tubacex India), or federal and state laws themselves promote the prevention of discrimination of any kind (USA, Saudi Arabia, Singapore, etc.).

Measures adopted to promote employment [GRI 3-3]

TUBACEX promotes stable and quality employment through responsible people management adapted to the different environments in which it operates. The Group prioritises local recruitment in the countries and communities where it carries out its activities, contributing to the socio-economic development of the environment and to the creation of sustainable employment.

It also promotes employment through talent attraction and retention programmes, training and professional development plans, and equal opportunities policies that ensure recruitment and promotion processes based on merit, capability and non-discrimination.

The Group also fosters the integration of groups with greater difficulties in accessing employment, such as persons with disabilities, through specific measures and corporate social responsibility programmes, in line with applicable legislation and its commitments to diversity and inclusion.

In addition, TUBACEX adapts its working and organisational conditions to promote stability, work-life balance and employee well-being, thereby contributing to the creation of an attractive working environment and the maintenance of employment in the long term.

Protocols against sexual harassment and harassment on the grounds of sex [GRI 3-3]

The TUBACEX Code of Conduct establishes a framework for action aligned with the fundamental principles of the International Labour Organization, expressly rejecting any form of physical, psychological or moral harassment, as well as abuse of authority. All individuals working with the Group must act with respect towards their working environment, regardless of their hierarchical level, promoting a respectful, healthy and safe working climate.

During the 2025 and 2024 financial years, no reports have been received relating to breaches of these principles. In addition to the Code of Conduct, which is mandatory for all Group companies, the different plants apply applicable

local legislation and, where appropriate, have specific protocols and action plans in place to address sexual harassment and harassment on the grounds of gender.

This commitment is reinforced by the Equal Opportunities, Non-Discrimination and Inclusion Policy, approved in its latest revision in December 2025, in which TUBACEX expressly states its commitment to preventing and eradicating any form of harassment —including workplace, sexual or gender-based harassment— as well as any manifestation of gender-based violence, promoting a safe, inclusive and discrimination-free working environment.

Integration and universal accessibility of persons with disabilities [GRI 3-3]

TUBACEX promotes the labour integration and universal accessibility of persons with disabilities as part of its commitment to equal opportunities, diversity and inclusion. The Group ensures compliance with applicable legislation on disability in all the countries in which it operates, adapting its practices and measures to different regulatory frameworks and local contexts.

In countries where specific regulations exist regarding the employment of persons with disabilities, TUBACEX complies with legal requirements relating to recruitment, the application of alternative measures and accessibility in the workplace. In Spain, this compliance is implemented, among other measures, through the procurement of goods and services from Special Employment Centres, without prejudice to ongoing efforts aimed at strengthening direct labour integration.

Furthermore, the Group promotes universal accessibility through the progressive adaptation of its facilities and workplaces, as well as through the adoption of organisational and flexible measures that address the specific needs of persons with disabilities.

1.4 Information on anti-corruption and anti-bribery

1.4.1 Corruption and bribery

Measures to combat money laundering

TUBACEX has in place a comprehensive framework for the prevention of money laundering and corruption, based on its Code of Conduct, which expressly prohibits any actions that may facilitate such practices and requires compliance with applicable legislation, as well as with internal procedures aimed at detecting and rejecting suspicious transactions or forms of payment.

This commitment is reinforced through specific policies regulating key aspects such as the prohibition of gifts, hospitality or compensation to public officials; the responsible management of relationships with business partners, consultants and third parties; and the prohibition of political contributions, ensuring that donations and sponsorships are made exclusively for social, educational, cultural or humanitarian purposes and under criteria of transparency and legality.

In addition, the Group has a Compliance Plan aligned with the regulatory requirements of each country in which it operates, and an independent Compliance Function governed by a Charter approved by the Board of Directors. This system enables the verification and harmonisation of regulatory compliance across all jurisdictions in which TUBACEX operates.

Furthermore, through its general purchasing conditions, TUBACEX requires its suppliers to implement preventive and compliance measures in relation to money laundering and corruption, as well as to guarantee that no improper payments, gifts or commissions have been or will be made, reserving the right to terminate contracts in the event of non-compliance.

Contributions to foundations and non-profit organisations

The contributions made to foundations and non-profit organisations during the 2025 and 2024 financial years are set out below:

Entity / Foundation	2024	2025
Colabora Birmania	€51,000	€51,000
Unicef	€75,000	€75,000
Dale Candela	€10,000	-
Cruz Roja	€42,000	
Cáritas	-	€57,500
Fundación Etorkintza	€15,000	-
Waste Lab Bizkaia	-	€16,940

The Company has allocated EUR 463,511 (EUR 468,661 in 2024) to various initiatives in the areas of training and functional diversity, primarily promoted through the Tubacex Foundation, including the most relevant initiatives mentioned above. This figure includes the amounts managed through the Foundation, as well as those contributed by other Group companies.

1.5 Information on society

1.5.1 Company commitments to sustainable development

TUBACEX has been a signatory of the United Nations Global Compact since 2004, which is the most important voluntary initiative in the areas of human rights, labour, environment and anti-corruption. Through this commitment, TUBACEX supports the promotion of the fundamental pillars required to address the major challenges of sustainable development, advancing the 10 universal principles and reporting annually on its progress in implementing them. Furthermore, it materialises its commitment to addressing the major challenges of sustainable development, channelled through the 2030 Agenda and its Sustainable Development Goals (SDGs), from which the rest of the proposals, policies and strategies of international sustainability frameworks are derived.

The SDGs promoted by the organisation within its sustainability plan are detailed below.

ESG Plan PILLAR	Main focus	Priority SDGs
1. Climate neutrality and circular economy	Reduction the environmental impact of operations through decarbonisation, improved energy efficiency, promotion of the circular economy and integration of sustainability criteria into the supply chain.	**SDG 13** Climate action **SDG 12** Responsible consumption and production **SDG 7** Affordable and clean energy
2. Innovative solutions for the energy transition	Development and industrialization of innovative technological solutions that contribute to the energy transition, supporting the decarbonization of customers and the diversification of the business through R&D, collaboration and open innovation.	**SDG 9** Industry, innovation and infrastructure **SDG 7** Affordable and clean energy **SDG 13** Climate action
3. People and social environment	Creation of a safe, healthy, inclusive and diverse work environment, promoting quality employment, talent development, equal opportunities and contributing to the well-being of communities and respect for human rights.	**SDG 8** Decent work and economic growth **SDG 3** Good health and well-being **SDG 5** Gender equality
4. Transparency and good governance	Reinforcement of a culture of ethics, integrity and transparency through good governance systems, risk management, regulatory compliance, information protection and responsible communication with stakeholders.	**SDG 16** Peace, justice and strong institutions **SDG 17** Partnerships to achieve the goals

1.5.2 Subcontracting and suppliers

Supervision and audit systems and their results

During 2025, a total of 1,055 suppliers were assessed on sustainability matters (913 in 2024), representing, in aggregate, 92.7% of TUBACEX's total expenditure (87.75% in 2024). One hundred per cent of the assessed suppliers completed a specific questionnaire on their environmental management model, which serves as the basis for the development of an internal supplier rating. This tool has enabled the expansion of evaluation criteria, incorporating key sustainability aspects such as environmental performance, respect for human rights, prevention of child labour and occupational health and safety conditions, thereby strengthening supplier engagement in the development of ESG standards aligned with those of the Company.

The questionnaire incorporates an automatic alert system that is triggered when a critical question receives an inadequate response, enabling the identification of potential risks and ensuring that suppliers within the panel comply with the ESG requirements established by TUBACEX.

TUBACEX considers raw material suppliers to have the highest potential environmental impact, given their significant contribution to the Company's overall environmental performance. For this reason, these suppliers are required to provide documentary evidence of their environmental management model and are subject to a specific audit plan.

The model for assessing the environmental impact of supply is primarily based on two variables: the environmental management system implemented by the supplier and the proximity to the sourcing location. According to this model, suppliers with higher scores are considered those generating a lower negative impact in terms of sustainability within the supply chain.

1.5.3 Consumers

Measures relating to consumer health and safety

The increasing specialisation of the Tubacex Group in solutions for the energy sector requires compliance with demanding international quality standards. In this context, the attainment and maintenance of key international certifications (including ASTM, ASME and Norsok, among others) ensure that the Company's products meet the highest standards of quality, safety and reliability.

All Tubacex products are manufactured in accordance with applicable international standards, and production processes are subject to specific monitoring and control, including supervision by external inspectors where required by customers and, increasingly, by end users themselves.

In addition, all Group plants are periodically audited in accordance with the relevant standards and certifications. The Company has not only continuously renewed its existing certifications but has also progressively expanded their scope and volume year after year, thereby reinforcing its commitment to operational excellence and continuous improvement.

Complaint handling systems, complaints received and their resolution

Tubacex has a Master Security Plan, consisting of a set of procedures, policies and projects that address the cybersecurity of its information systems. This plan is reviewed annually and updated with the actions and projects implemented each year. As a result, no complaints have been received regarding breaches of customer privacy or data loss.

1.5.4 Información fiscal [GRI 3-3]

The Group is firmly committed to compliance with the corporate governance policies it has adopted within the framework of its **corporate social responsibility**, with the aim of contributing voluntarily and actively in the environmental, social and economic spheres.

In this context, the Tubacex Group updated its Corporate Tax Policy in December 2023, with the aim of setting out its **tax strategy** and thereby ensuring the control of financial and non-financial risks, as well as compliance with good tax practices by the companies and professionals that form part of the Group.

In particular, the Corporate Tax Policy pursues the following objectives:

- To comply with corporate governance policies.
- To ensure proper compliance with tax regulations.
- To consolidate good tax practices.
- To facilitate risk management.

The actions of the Tubacex Group are guided by the following general **principles:**

• The proper and continuous **fulfilment of tax obligations** as set out in the applicable tax regulations in each jurisdiction.
• The **monitoring of recommendations** set out in codes of good tax practices implemented in the jurisdictions in which it operates, taking into account specific needs and circumstances.
• The **prevention and reduction of significant tax risks**, ensuring that taxation is appropriately aligned with the structure and location of activities, human and material resources and business risks.

The following represent the Tubacex Group's good tax practices:

• **Collaboration with the tax authorities** in all actions aimed at clarifying different interpretations of tax regulations, as well as in providing documentation of tax relevance arising from review or inspection procedures, all with the greatest possible diligence.
• **Refraining from the use of artificial structures** unrelated to its own activities, as well as from carrying out transactions with related entities solely for the purpose of eroding tax bases or shifting profits to low-tax jurisdictions.
• **Avoiding opaque structures** for tax purposes, understood as those designed to prevent the competent tax authorities from identifying the ultimate responsible party for activities or the ultimate beneficial owner of the assets or rights involved.
• **Not establishing or acquiring companies resident in countries or territories considered tax havens** or included in the European Union list of non-cooperative jurisdictions, except where a Group company is required to do so in order to carry out operations in such countries or territories.
• Making whistleblowing channels available to enable the reporting of conduct that may involve irregularities or breaches of risk management systems.

Profit before tax by country [GRI 207-4]

The significant information on profits obtained, grouped by the main locations in which the Group operates (in thousands of euros), is set out below:

	2024	2025
AUSTRIA	*2,157*	*2,515*
BRAZIL	*- 177*	*234*
UNITED ARABIC EMIRATES	*959*	*9,853*
FRANCE	*894*	*- 66*
INDIA	*4,284*	*3,464*
ITALY	*4,673*	*- 9,654*
NORWAY	*7,469*	*1,898*
SPAIN	*6,897*	*- 9,915*
UNITED STATES OF AMERICA	*5,859*	*- 14,480*
Others	*162*	*- 3,794*
Consolidated Adjustments (IFRS 3)	*- 3,177*	*- 3,014*
TOTAL	**30,001**	**- 22,958**

The amount under "Other" corresponds to commercial representation entities and other companies with a lower level of activity relative to the total volume.

Income taxes paid [GRI 207-4]

The amounts paid in respect of corporate income tax for the 2025 and 2024 financial years are included (in thousands of euros).

	2024	*2025*
AUSTRIA	-	683
BRAZIL	-	-
UNITED ARABIC EMIRATES	-	-
FRANCE	-	-
INDIA	1,691	884
ITALY	-	-
NORWAY	970	1,874
SPAIN	1,099	
UNITED STATES OF AMERICA	1,107	333
THAILAND	342	358
CANADA	3,790	
Others	-	27
Consolidated Adjustments (IFRS 3)	-	-
TOTAL	**8,987**	**4,160**

Public grants received [GRI 201-4]

As indicated in the breakdown of the item "Other operating income" in the consolidated income statement, operating grants amounted to EUR 9,004 thousand in the 2025 financial year (EUR 5,046 thousand in 2024).

SECTION III: ANNEXES

ANNEXES	Title	Contents
Annex I	Materiality analysis	Methodology and results
Annex II	Covered disclosure requirements set out in the ESRS	Table 1. Regulatory Reference and Disclosure Requirements. Table 2. Detail of the material impacts, risks and opportunities, grouped by themes of the ESRS, resulting from the materiality assessment process.
Annex III	Corporate Policies	Reporting of your presence in the report Date and approval body. Management framework Commitments
Annex IV	Complementary Sustainability information corresponding to non-material aspects	Biodiversity
Annex VI	European taxonomy of Activities Environmentally Sustainable	Disclosure requirements on the eligibility and alignment of Tubacex's activity with the European Taxonomy of Environmentally Sustainable Activities.

Annex I. Materiality analysis

To address this process, an analysis of the organisation's context, its market and its relationship with sustainability must be carried out, as well as an assessment of its stakeholders and the value chain as a whole, in order to gain perspective and better understand the impact of the various sustainability matters both on its stakeholders and on its business.

To this end, consideration is given to the types of activities, services, products and business relationships of Tubacex, as well as to the economic, environmental and human rights challenges applicable in relation to its activities, sectors and geographical locations.

For the determination of materiality throughout Tubacex's value chain, reference is made to materiality analyses published in the sustainability reports of its main customers and suppliers or comparable companies, as well as to other relevant sources providing sectoral information, such as the standards of the Sustainability Accounting Standards Board (SASB) and materiality analysis tools for different sectors developed by MSCI (Morgan Stanley Capital International).

i. Impact materiality

Impact materiality aims to identify the most significant consequences of the organisation's activities on the environment and on people.

To carry out the materiality analysis from this perspective, the following steps are undertaken:

- **Identification of impacts**

Through an internal reflection process, a list of impacts associated with the different sustainability matters identified based on ESRS, as well as other sources of information, is drawn up.

- **Determination of materiality**

The identified impacts must be assessed and prioritised taking into account the views of Tubacex's stakeholders. Where direct participation is not possible, the views of independent experts or internal representatives of these stakeholder groups are considered, as they are familiar with their needs, expectations and opinions through their direct and ongoing relationship with them.
The criteria used for the assessment and prioritisation of impacts are those proposed by the ESRS and their implementation guidance, and are based on the severity and likelihood of occurrence of such impacts.

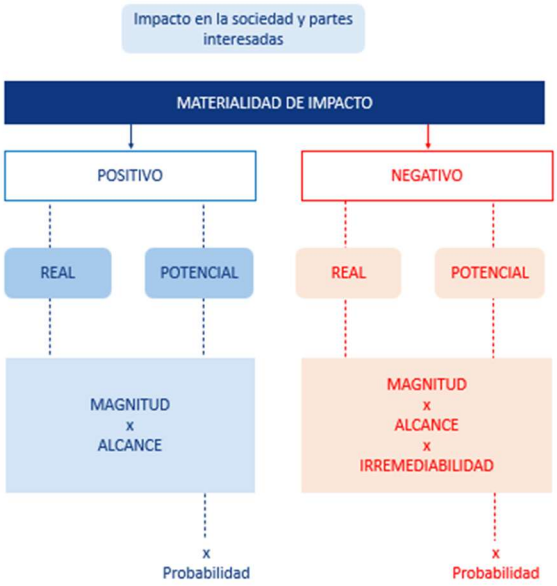
For the determination of severity, the following criteria are considered:

o **Scale**: assesses how serious or beneficial the negative or positive impact is for people or the environment. It is rated on a scale from 0 (None), 1 (Minimal), 2 (Low), 3 (Medium), 4 (High) and 5 (Severe).

o **Scope**: evaluates how widespread the identified negative or positive impacts are. In environmental impacts, scope may be understood as the extent of environmental damage or its geographical reach. In impacts related to people, it may be understood as the number of people adversely affected. It is rated on a scale from 0 (None), 1 (Limited), 2 (Concentrated), 3 (Medium), 4 (Widespread/generalised) and 5 (Global/total).

In the case of negative impacts, the following additional sub-criterion is included:

Remediability: depends on the degree of difficulty involved in restoring or correcting the resulting harm. It is rated on a scale from 0 (Very easy to remedy), 1 (Relatively easy to remedy in the short term), 2 (Remediable with effort (time and cost)), 3 (Difficult to remedy or requiring the medium term), 4 (Very difficult to remedy or requiring the long term) and 5 (Irreversible or not remediable).



Criteria used for impact materiality

MATERIALIDAD DE IMPACTO

Gravedad del impacto	
Escala	
5	Absoluto
4	Alto
3	Medio
2	Bajo
1	Mínimo
0	Ninguno

Gravedad del impacto	
Alcance	
5	Global/Total
4	Generalizado
3	Medio
2	Concentrado
1	Limitado
0	Ninguno

Gravedad del impacto	
Remediabilidad	
5	Irremediable/Irreversible
4	Muy difícil de remediar/Largo plazo
3	Difícil de remediar/Medio plazo
2	Remediable con esfuerzo (tiempo y dinero)
1	Relativamente fácil de remediar
0	Muy difícil de remediar

Probabilidad de ocurrencia	
5	Real
4	Muy alta
3	Alta
2	Media
1	Baja

Scales used for impact materiality

ii. Financial materiality

Financial materiality is carried out through a reflection process aimed at identifying, quantifying and disclosing significant risks and opportunities associated with the different sustainability matters identified under the ESRS, which may affect a company's financial position.

A sustainability matter is considered material from a financial perspective if it generates, or could reasonably be expected to generate, risks and opportunities that influence the development of the financial position, financial performance, cash flows, access to finance or cost of capital in the short, medium or long term.

- **Identification of risks and opportunities**

For each sustainability matter covered by the thematic ESRS, the associated risks and opportunities are identified. As a starting point, AR 16 of ESRS 1 is used, which includes a table of "Sustainability matters covered by the thematic ESRS" providing an inventory of "Topics", "Subtopics" and "Sub-subtopics". In some cases, specific risks or opportunities may arise at the "Subtopic" or "Sub-subtopic" level; however, risks and opportunities are generally identified at the "Topic" level.

The starting point for identifying risks and opportunities is the impacts. For most impacts, it is likely that, over time, they will give rise to either a risk or an opportunity.

However, there may also be risks or opportunities not directly related to identified impacts, typically arising from dependencies on natural and social resources. These may occur in two ways:

- The ability to continue using and obtaining the necessary resources (availability), as well as the quality and price conditions under which such resources can be accessed.

- The ability to rely on the relationships required for business processes under acceptable conditions.

Finally, it must be determined whether these dependencies constitute risks (potential negative deviations in cash flows) or opportunities (potential positive deviations in cash flows).

• Determination of materiality

Once risks and opportunities have been identified, their materiality for disclosure purposes is determined based on a combination of the likelihood of occurrence and the potential magnitude of their financial effects, assessed against appropriate thresholds.

The ESRS do not prescribe a specific methodology or definition for determining financial materiality thresholds; instead, they refer to approaches similar to those used in practice for determining materiality in the preparation of financial statements, both from an accounting and auditing perspective.

In financial audit practice in Spain, recommended methodologies are established with indicative parameters set out in documents known as “guidance notes” issued by different professional auditing bodies (ICJC and REA).

Taking as a starting point paragraph 49 of ESRS 1, which states that a sustainability matter is material from a financial perspective if it generates, or could reasonably be expected to generate, risks and opportunities that influence the financial position, financial performance, cash flows, access to finance or cost of capital in the short, medium or long term, indicators or line items from the various financial statements have been selected to cover all these aspects. The thresholds established by commonly accepted methodologies, as set out in the guidance of financial audit bodies, have also been applied to the financial statement figures of the Tubacex Group corresponding to the first half of the 2025 financial year.

Criteria used for financial materiality

MATERIALIDAD FINANCIERA				
Probabilidad de ocurrencia			Magnitud de los posibles efectos financieros	
5	Real	81-100%	5	> 10.500.000 €
4	Muy alta	61-80%	4	5.000.000 € - 10.500.000 €
3	Alta	31-60%	3	3.000.000 € - 5.000.000 €
2	Media	11-30%	2	1.000.000 € - 3.000.000 €
1	Baja	<10%	1	< 1.000.000 €

Scales used for financial materiality

• **Assessment of risks and opportunities**

The identified risks and opportunities must be assessed and prioritised considering the views of Tubacex's stakeholders. Where direct participation is not possible, the views of independent experts or internal representatives of these stakeholder groups are considered, as they are familiar with their needs, expectations and opinions through their direct and ongoing relationship with them.

The criteria used for the assessment and prioritisation of risks and opportunities are those proposed by the ESRS and their implementation guidance, and are based on the likelihood of occurrence and the potential magnitude of financial effects:

- **Criterion 1**: Magnitude. This refers to the monetary estimation of the impact of the identified risks or opportunities on financial performance, financial position, cash flows, and access to and cost of capital in the short, medium and long term, considering the scale of five categories defined in the materiality thresholds (section 3.3.2).
- **Criterion 2**: Likelihood. This refers to the probability that the risk or opportunity will occur. For its assessment, a scale of five categories is defined: 1 Low (5%–25%), 2 Medium (25%–50%), 3 High (50%–75%), 4 Very high (75%–90%), 5 Almost certain (90%–100%).

iii. Double materiality.

Double materiality considers the two dimensions described above: impact materiality and financial materiality. Both are interrelated and are represented in the form of a two-dimensional matrix.

Annex II. Disclosure requirements covered as set out in the ESRS

Table 1. Disclosure requirements and regulatory reference

As a result of the assessment of the materiality of the different sustainability matters, the inventory of disclosure requirements included in the report is set out below, as well as those that have been omitted as they have not been considered material.

GENERAL ESRS

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
ESRS 2	General	-	-	ESRS 2 GOV-1	1.1	Indicator 13 in Table 1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (5), Annex II Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2	General	-	-	ESRS 2 GOV-4	1.1	Indicator 10 in Table 3 of Annex 1			
ESRS 2	General	-	-	ESRS 2 SBM-1		Indicator 4 in Table 1 of Annex 1	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6), Table 1: Qualitative information on environmental risk and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2	General	-	-	ESRS 2 SBM-1		Indicator 9 in Table 2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2	General	-	-	ESRS 2 SBM-1		Indicator 14 in Table 1 of Annex 1		Delegated Regulation (EU) 2020/1818 (7), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
ESRS 2	General	-	-	ESRS 2 SBM-1				Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	

ENVIRONMENTAL ESRS

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
E1	Climate change	Climate change mitigation	-	ESRS 2.GOV-3	2.1.1				
			-	ESRS 2.SBM3	2.1.3				
			-	ESRS 2.IRO-1	2.1.4				
			-	E1-1	2.1.2		Article 449(a) of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Bank portfolio – Climate change-related transition risk: credit quality of exposures by sector, issuances and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12(1)(d) to (g) and Article 12(2)	Regulation (EU)-2021/1119, Article 2(1)
			-	E1-2	2.1.5				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
			-	E1-3	2.1.6				
			-	E1-4	2.1.7	Indicator No. 4 in Table 2 of Annex 1	Article 449(a) of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 1: Bank portfolio – Climate change-related transition risk: credit quality of exposures by sector, issuances and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12(1)(d) to (g) and Article 12(2)	
			-	E1-5	2.1.8	Indicator 5 in Table 1 and Indicator 5 in Table 2 of Annex 1 Indicator Nos 5 and 6 in Table 1 of Annex 1			
			-	E1-6	2.1.9	Indicators 1 and 2 in Table 1 of Annex 1		Delegated Regulation (EU) 2020/1818, Articles 5(1) and 6 and 8, paragraph 1	
				E1-6	2.1.9	Indicator 3 in Table 1 of Annex 1	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template	Delegated Regulation (EU) 2020/1818, Article 8(1)	

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
							3: Bank portfolio – Climate change-related transition risk: harmonisation parameters		
			-	E1-7	2.1.10				Regulation (EU)-2021/1119, Article 2(1)
			-	E1-8	2.1.11				
			-	E1-9	2.1.12		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5. Bank wallet. Physical risk linked to climate change: exposures subject to physical risk.	Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	
			-	E1-9	2.1.12		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; template 2: Bank portfolio - Climate	Delegated Regulation (EU) 2020/1818, Annex II	

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
							change transition risk: loans secured by collateral in the form of immovable property — Energy efficiency of collateral		
		Adaptation to climate change	-	ESRS 2. SBM3	2.1.3				
			-	ESRS 2.IRO-1	2.1.4				
			-	E1-2	2.1.5				
			-	E1-3	2.1.6				
			-	E1-4	2.1.7	Indicator No. 4 in Table 2 of Annex 1	Article 449(a) of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Bank portfolio – Climate change-related transition risk: harmonisation parameters	Delegated Regulation (EU) 2020/1818, Article 6	
			-	E1-9	2.1.12		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453,	Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
							paragraphs 46 and 47; Template 5. Bank wallet. Physical risk linked to climate change: exposures subject to physical risk.		
			-	E1-9	2.1.12		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; template 2: Bank portfolio - Climate change transition risk: loans secured by collateral in the form of immovable property — Energy efficiency of collateral	Delegated Regulation (EU) 2020/1818, Annex II	
		Energy	-	ESRS 2. SBM3	2.1.3				
			-	ESRS 2.IRO-1	2.1.4				
			-	E1-2	2.1.5				
			-	E1-3	2.1.6				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
			-	E1-4	2.1.7	Indicator No. 4 in Table 2 of Annex 1	Article 449(a) of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Bank portfolio – Climate change-related transition risk: harmonisation parameters	Delegated Regulation (EU) 2020/1818, Article 6	
			-	E1-5	2.1.8	Indicator 5 in Table 1 and Indicator 5 in Table 2 of Annex 1 Indicator Nos 5 and 6 in Table 1 of Annex 1			
			-	E1-9	2.1.12		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5. Bank wallet. Physical risk linked to climate change: exposures subject to physical risk.	Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
			-	E1-9	2.1.12		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; template 2: Bank portfolio - Climate change transition risk: loans secured by collateral in the form of immovable property — Energy efficiency of collateral	Delegated Regulation (EU) 2020/1818, Annex II	
E2	Pollution	Water, air and soil pollution	-	ESRS 2.IRO-1	2.2.1				
				E2-1	2.2.2				
				E2-2	2.2.3				
				E2-3	2.2.4				
				E2-4	2.2.5	Indicator 8 in Table 1 of Table 1, Indicator No 2 of Table 2 of Annex 1, Indicator No 1 of Table 2 of Annex 1, Indicator No 3 of Table 2 of Annex 1			
				E2-6	2.2.6				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
		Contamination of living organisms and food resources	-	ESRS 2.IRO-1	Not covered as it is not material				
			-	E2-1					
			-	E2-2					
			-	E2-3					
			-	E2-6					
		Substances of concern and very concern	-	ESRS 2.IRO-1	Not covered as it is not material				
			-	E2-1					
			-	E2-2					
			-	E2-3					
			-	E2-5					
			-	E2-6					
		Microplastics	-	ESRS 2.IRO-1	Not covered as it is not material				
			-	E2-1					
			-	E2-2					
			-	E2-3					
			-	E2-4		Indicator 8 in Table 1 of Table 1, Indicator No 2 of Table 2 of Annex 1, Indicator No 1 of Table 2 of Annex 1, Indicator No 3 of Table 2 of Annex 1			

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
			-	E2-6					
E3	Water and Marine Resources	Water	Water consumption, water withdrawals and discharges	ESRS 2.IRO-1	2.3.1				
				E3-1	2.3.2	Indicator 7, 8 and 12 in Table 2 of Annex 1			
				E3-2	2.3.3				
				E3-3	2.3.4				
				E3-4	2.3.5				
				E3-5	2.3.6				
		Marine Resources	Discharges into oceans and/or extraction and utilization of marine resources	ESRS 2.IRO-1	Not covered as it is not material				
				E3-1		Indicator 7, 8 and 12 in Table 2 of Annex 1			
				E3-2					
				E3-3					
				E3-5					
E4	Biodiversity	All	-	ESRS 2. SBM3	Not covered as it is not material				
			-	ESRS 2.IRO-1					
			-	E4-1					
			-	E4-2		Indicator 11, 12 and 15 in Table 2 of Annex 1			
			-	E4-3					

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
			-	E4-4					
			-	E4-5					
			-	E4-6					
E5	Circular economy	Resource inputs, including resource utilization	-	ESRS 2.IRO-1	2.5.1				
			-	E5-1	2.5.2				
			-	E5-2	2.5.3				
			-	E5-3	2.5.4				
				E5-4	2.5.5				
			-	E5-6	2.5.7				
		Resource outputs related to products and services	-	ESRS 2.IRO-1	2.5.1				
			-	E5-1	2.5.2				
			-	E5-2	2.5.3				
			-	E5-3	2.5.4				
			-	E5-5	2.5.6	Indicator 13 in Table 2 of Annex 1 Indicator 9 in Table 1 of Annex 1			
			-	E5-6	2.5.7				
		Waste	-	ESRS 2.IRO-1	2.5.1				
			-	E5-1	2.5.2				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure Requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
			-	E5-2	2.5.3				
			-	E5-3	2.5.4				
			-	E5-5	2.5.6	Indicator 13 in Table 2 of Annex 1 Indicator 9 in Table 1 of Annex 1			
			-	E5-6	2.5.7				

SOCIAL ESRS

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
S1	Own staff	Working conditions	Secure Employment	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-6	3.1.7				
				S1-7	3.1.8				
				S1-11	3.1.12				
				S1-17	3.1.18	Indicator 7 in Table 3 of Annex I Indicator 10 in Table 1 and Indicator 14 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
			Working Time	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
						Indicator 1 and 11 in Table 3 of Annex I			
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-6	3.1.7				
				S1-7	3.1.8				
				S1-17	3.1.18	Indicator 7 in Table 3 of Annex I Indicator 10 in Table 1 and Indicator 14 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
			Adequate salaries	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
				S1-5	3.1.6				
				S1-6	3.1.7				
				S1-7	3.1.8				
				S1-10	3.1.11				
				S1-17	3.1.18	Indicator 7 in Table 3 of Annex I Indicator 10 in Table 1 and Indicator 14 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
			Social Dialogue	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-6	3.1.7				
				S1-7	3.1.8				
				S1-8	3.1.9				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
				S1-17	3.1.18	Indicator 7 in Table 3 of Annex I Indicator 10 in Table 1 and Indicator 14 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
			Freedom of association	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-6	3.1.7				
				S1-7	3.1.8				
				S1-8	3.1.9				
				S1-17	3.1.18	Indicator 7 in Table 3 of Annex I Indicator 10 in Table 1 and Indicator 14 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
			Collective bargaining	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-6	3.1.7				
				S1-7	3.1.8				
				S1-8	3.1.9				
				S1-17	3.1.18	Indicator 7 in Table 3 of Annex I Indicator 10 in Table 1 and Indicator 14 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
			Work-life balance	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-6	3.1.7				
				S1-7	3.1.8				
				S1-15	3.1.16				
				S1-17	3.1.18	Indicator 7 in Table 3 of Annex I Indicator 10 in Table 1 and Indicator 14 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
			Work-life balance	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-6	3.1.7				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
				S1-7	3.1.8				
				S1-14	3.1.15	Indicator 2 and 3 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-17	3.1.18	Indicator 7 in Table 3 of Annex I Indicator 10 in Table 1 and Indicator 14 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
		Equal treatment and opportunities for all	Gender equality	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-16	3.1.17	Indicator 12 in Table 1 of Annex I Indicator 8 in Table 3 of Annex I			

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
			Training and development	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-13	3.1.14				
			Employment and inclusion	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-12	3.1.13				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
			Diversity	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
				S1-9	3.1.10				
		Other labor rights	Child labour	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
			Forced labour	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
						Indicator 1 and 11 in Table 3 of Annex I			
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
			Adequate housing	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				
			Privacy	S1-1	3.1.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex I Indicator 1 and 11 in Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
				S1-2	3.1.3				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
				S1-3	3.1.4	Indicator 5 in Table 3 of Annex I			
				S1-4	3.1.5				
				S1-5	3.1.6				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
S2	Staff of the Value chain	All	All, except other labour rights (not covered because it is non-material)	S2-1	3.2.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1 Indicators 11 and 4 in Table 3 of Annex 1 Indicator 10 in Table 1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
				S2-2	3.2.3				
				S2-3	3.2.4				
				S2-4	3.2.5	Indicator 14 in Table 3 of Annex 1			
				S2-5	3.2.6				

ESRS	Theme	Subtheme	Sub-Sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
S3	Affected groups	All	All, except rights of indigenous peoples (not covered because it is not material)	S3-1	3.3.2	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1 Indicator 10 in Table 1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
				S3-2	3.3.3				
				S3-3	3.3.4				
				S3-4	3.3.5	Indicator 14 in Table 3 of Annex 1			
				S3-5	3.3.6				
S4	Consumers and End users	All	All	S4-1	Not covered as it is not material	Indicator 9 in Table 3 and Indicator 10 and 11 in Table 1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	
				S4-2					
				S4-3					
				S4-4		Indicator 14 in Table 3 of Annex 1			
				S4-5					

GOVERNANCE ESRS

ESRS	Theme	Subtheme	Sub-sub-theme	Disclosure requirement	Memory section	Regulation on the disclosure of sustainability-related information in the financial services sector	Pillar 3 Reference	Benchmark Regulation reference	European Climate Law Reference
G1	Business conduct	Corporate culture	-	G1-1	4.1.2	Indicator 6 and 15 in Table 3 of Annex 1			
		Whistleblower protection	-	G1-1	4.1.2	Indicator 6 and 15 in Table 3 of Annex 1			
		Animal welfare	-	G1-1	Not covered as it is not material	Indicator 6 and 15 in Table 3 of Annex 1			
		Political commitment and lobbying activities	-	G1-1	Not covered as it is not material	Indicator 6 and 15 in Table 3 of Annex 1			
			-	G1-5					
		Supplier relationship management, including payment practices	-	G1-1	4.1.2	Indicator 6 and 15 in Table 3 of Annex 1			
			-	G1-2	4.1.3				
			-	G1-6	4.1.7				
		Corruption and bribery	All	G1-1	4.1.2	Indicator 6 and 15 in Table 3 of Annex 1			
				G1-3	4.1.4				
				G1-4	4.1.5	Indicator 16 and 17 in Table 3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	

Topics, subtopics or sub-subtopics that are not material are not covered in the content of this report. This conclusion has been reached on the basis of the materiality analysis carried out in accordance with section 1.1.2 IRO-1 of this document, which sets out the criteria and thresholds used for this determination. Matters that have not been identified as material are those for which no relevant IRO (impact, risk or opportunity) has been identified, either due to their magnitude or severity or due to their likelihood of occurrence.

Table 2. Detail of material impacts, risks and opportunities, grouped by ESRS topics, resulting from the materiality assessment process

ESRS	Theme	Subtheme	Sub-Sub-theme	Material IROs	Relationship with the value chain
E1	Climate change	Climate change mitigation	-	(I) Generation of greenhouse gases (GHG), directly and indirectly	The entire value chain
			-	(I) Reduction of energy and resource consumption through energy efficiency measures	The entire value chain
			-	(I) Reduction of GHG emissions directly or indirectly through specific reduction measures and mechanisms such as CBAM, EU ETS II or internal carbon prices	The entire value chain
			-	(R) Extreme weather events (Storms, extreme droughts, etc.)	The entire value chain
		Adaptation to climate change	-	(I) Contribution to environmental protection through climate change adaptation actions	The entire value chain
			-	(I) Impact on human health (damage, injury, and other adverse effects) due to exposure to conditions arising from climate change, such as heat stress or extreme fires	The entire value chain
		Energy	-	(I) Consumption of energy resources and depletion of fossil fuels and other natural resources	The entire value chain
			-	(I) Contracting of 100% renewable energy, thus avoiding the consumption of fossil energy resources.	The entire value chain
			-	(I) Implementation of renewable energy self-consumption systems	The entire value chain
			-	(R) Rising energy costs	The entire value chain

ESRS	Theme	Subtheme	Sub-Sub-theme	Material IROs	Relationship with the value chain
			-	(R) Energy market volatility	The entire value chain
			-	(R) High dependence on fossil fuel energy	The entire value chain
E2	Pollution	Air Pollution	-	(I) Alteration of air quality with negative effects on human health, ecosystems and other living beings	The entire value chain
				(I) Reduction of air pollution through the implementation of best available technologies (BAT)	The entire value chain
				(I) Noise pollution	The entire value chain
		Water Pollution	-	(I) Deterioration of water quality due to polluting discharges, with negative effects on human health and aquatic ecosystems	The entire value chain
		Soil Contamination	-	(I) Alteration of soil quality without generating risks to human health or ecosystems	The entire value chain
				(I) Soil contamination with negative effects on ecosystems, living beings and workers or local community	The entire value chain
E3	Water and marine resources	Water	General	(O) Improved water management, reuse and recycle water in the process.	The entire value chain
			Water consumption	(I) Depletion of water resources	The entire value chain
				(R) Supply constraints and price increases	The entire value chain
			Water withdrawals	(R) Legal disputes over water rights and access to water resources.	The entire value chain

ESRS	Theme	Subtheme	Sub-Sub-theme	Material IROs	Relationship with the value chain
			Discharges into water	(I) Alteration of the quality of surface or groundwater due to polluting discharges	The entire value chain
				(R) Litigation for environmental damage and fines and penalties for non-compliance with regulations.	The entire value chain
E5	Circular economy	Resource inputs, including resource utilization	-	(I) Depletion of material resources (Intensive use of natural resources that can lead to their scarcity)	The entire value chain
			-	(I) Increased use of recycled materials	The entire value chain
			-	(I) Impact on the supply chain due to efficiency and recyclability requirements	The entire value chain
		Resource Output	-	(I) Loss of valuable materials due to lack of recycling	The entire value chain
				(I) Emissions associated with the use of non-circular materials	The entire value chain
				(I) Energy consumption in inefficient stages of the life cycle	The entire value chain
		Waste	-	(I) Soil contamination due to poor management of hazardous waste	The entire value chain
			-	(I) Land occupation by landfills or other waste facilities	The entire value chain
			-	(I) Reduction of landfill and increase of recycling or recovery of waste	The entire value chain
S1	Own staff	General	-	(R) Union pressure and labour conflicts.	Tubacex

ESRS	Theme	Subtheme	Sub-Sub-theme	Material IROs	Relationship with the value chain
		Working conditions	-	(I) Economic stability and financial security of workers	Tubacex
				(I) Workers' satisfaction with their job	Tubacex
				(I)Health and well-being of workers.	Tubacex
			Occupational Health and Safety	(I) Occupational accidents, injuries and illnesses	Tubacex
				(I) Detriment to physical and mental health	Tubacex
				(R) Absenteeism.	Tubacex
				(R) Increased insurance premiums.	Tubacex
		Equal treatment and opportunities for all	General	(I) Economic inequality	Tubacex
				(I) Discrimination, exclusion and social inequality based on sex, race or other personal condition	Tubacex
			Training and development	(I) Professional development, motivation and personal fulfilment	Tubacex
		Other labor rights	General	(I) Violation of human rights	Tubacex
				(I) Impact on education	Tubacex

ESRS	Theme	Subtheme	Sub-Sub-theme	Material IROs	Relationship with the value chain
				(I) Impact on the dignity and well-being of people	Tubacex
			Privacy	(I)Violation of individual rights	Tubacex
				(I) Loss or leakage of personal data information and its consequences	Tubacex
S2	Value Chain Personnel	Working conditions	Labor Conciliation	(I) Economic stability and financial security of workers	The entire value chain
				(I) Workers' satisfaction with their job	The entire value chain
				(I) Health and well-being of workers (work-life balance, flexibility, feeling of representation and labour protection, appropriate working environment, etc.)	The entire value chain
			Occupational Health and Safety	(I) Occupational accidents, injuries and illnesses	The entire value chain
				(I) Detriment to physical and mental health	The entire value chain
		Equal treatment and opportunities for all	Gender and pay equality	(I) Economic inequality	The entire value chain
				(I) Discrimination, exclusion and social inequality based on sex, race or other personal condition	The entire value chain
			Training and capacity building	(I) Professional development, motivation and personal fulfilment	The entire value chain

ESRS	Theme	Subtheme	Sub-Sub-theme	Material IROs	Relationship with the value chain
			Employment and inclusion of persons with disabilities	(I) Economic inequality	The entire value chain
				(I) Discrimination, exclusion and social inequality based on sex, race or other personal condition	The entire value chain
			Measures against violence and harassment	(I) Economic inequality	The entire value chain
				(I) Discrimination, exclusion and social inequality based on sex, race or other personal condition	The entire value chain
				(I) Existence of cases of violence and harassment	The entire value chain
				(I) Health and well-being of workers	The entire value chain
			Diversity	(I) Economic inequality	The entire value chain
				(I) Discrimination, exclusion and social inequality based on sex, race or other personal condition	The entire value chain
S3	Affected groups	General	General	(R) Risk of loss of investors and shareholders.	The entire value chain
		Economic, social and cultural rights	General	(I) Impact on people's health and well-being	The entire value chain
			Security-related incidents	(I) Injuries and human losses	The entire value chain
		Civil and political rights of groups	Freedom of expression	(I) Abuses or violations of rights	The entire value chain

ESRS	Theme	Subtheme	Sub-Sub-theme	Material IROs	Relationship with the value chain
			Freedom of assembly	(I) Abuses or violations of rights	The entire value chain
G1	Business conduct	General	-	(R) Reputational and brand risk, negatively harming the public perception of the Entity.	Tubacex
				(R) Risk of ability to attract investment and obtain financing on favourable terms.	Tubacex
		Corporate culture	-	(I) Better sustainability performance. Contribution to environmental protection, social development and good governance, ethics and integrity	Tubacex
				(I)Implementation of good governance practices: policies, training, etc.	Tubacex
		Whistleblower protection	-	(I) Professional or personal retaliation	Tubacex
		Supplier relationship management, including payment practices	-	(I) Contribution to the promotion of sustainable development through supply chain traction. Reduction of negative environmental and social impacts derived.	Tubacex

ESRS	Theme	Subtheme	Sub-Sub-theme	Material IROs	Relationship with the value chain
			-	(I) Impact on the supply chain. Supply chain disruption	Tubacex
		Corruption and bribery	Cases	(I) Undue persecution, misunderstandings or unfounded suspicions, unjustified investigations, damage to the individual reputation of innocent people	Tubacex
				(I) Abuse of power	Tubacex

ADDITIONAL GROUP-SPECIFIC INFORMATION

Subtopic	Material IROS	Relationship with the value chain	Disclosure Request
R&D&I	Development of new technologies that reduce environmental impact (reduction of energy consumption and promotion of the circular economy). Diversification to new businesses.	The entire value chain	MDR-P, MDR-A, MDR-M, MDR-T
Cybersecurity	Impact on business continuity, loss of material resources	The entire value chain	MDR-P, MDR-A, MDR-M, MDR-T

Annex III. Corporate policies

Policies	CSRD Section	Approved by:	Last Approved Date
General Sustainability Policy	E1, E2, E3, E5, S3, G1	Board of Directors	December 2025
Occupational health and safety policy	S1	Board of Directors	December 2025
Environment Policy and Climate Action	E1, E2, E3, E5	Board of Directors	December 2025
General Human Rights Policy	S1, S3	Board of Directors	December 2025
Diversity and Inclusion Policy	S1	CEO	December 2025
Training and Development Policy	S1	CEO	December 2025
Social Action Policy	S1, S3, G1	CEO	December 2025
Code of Conduct	G1	Board of Directors	2023
Corporate Policy of the Internal Information System	G1	Board of Directors	December 2023
Privacy Policy	G1	Board of Directors	May 2023
General Risk Control and Management Policy	G1	Board of Directors	December 2023
Supplier Code of Conduct	G1	CPO	December 2025

General Sustainability Policy

Scope of application

- All subsidiaries, production plants, logistics centres and commercial offices of the Group, in all countries in which it operates.
- TUBACEX extends its sustainability expectations to suppliers, contractors, business partners and distributors, promoting the progressive integration of practices aligned with the Group's values and principles.

Framework for action

- United Nations 2030 Agenda and Sustainable Development Goals (SDGs).
- United Nations Guiding Principles on Business and Human Rights (2011).
- OECD Guidelines for Multinational Enterprises (2011).
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998, updated 2022).
- Paris Agreement and United Nations Framework Convention on Climate Change.

Commitments

Governance and business ethics:

- Promote and maintain a responsible governance model that fosters good practices in governance, legal compliance, ethics, and the prevention of corruption and bribery.
- Ensure strict compliance with national and international legislation in all the markets in which it operates.
- Maintain an ongoing commitment to transparency and accountability, taking into account stakeholders' expectations.
- Provide transparent, regular and accessible reporting on identified sustainability impacts, risks and opportunities, as well as on the policies, actions and targets defined to address them effectively..
- Maintain an accessible, confidential and secure whistleblowing channel for all individuals and entities linked to the Company, ensuring protection against retaliation for those who report in good faith potential human rights violations, environmental impacts or ethical breaches..

People and human rights:

- Reaffirm an explicit, strict and public commitment to the respect and promotion of Human Rights, ensuring compliance across all Group activities and promoting the integration of practices consistent with this policy throughout the value chain.
- Implement a structured, appropriate and effective due diligence process within its operations and promote, in a consistent manner and based on identified risks, the adoption of responsible management practices among directly linked business partners.
- Promote professional development, equal opportunities, respect and non-discrimination, strengthening the integration of sustainability within the corporate culture.
- Promote a safe and healthy working environment, eliminating hazards and reducing risks, prioritising human life over other economic considerations.

Environment and energy transition:

- Minimise environmental impacts arising from its activities, aligning with international initiatives on circular economy, climate change and environmental and ecosystem protection.
- Reduce greenhouse gas emissions and ensure the sustainable use of natural resources.
- Support the energy transition through efficient energy use and the promotion of renewable energy sources.
- Promote research, development and innovation, ensuring the appropriate use of new technologies in order to modernise organisational and production processes, contributing to the decarbonisation of the economy and the creation of sustainable value.

Responsible value chain

- Maintain close relationships with all stakeholders linked to the Company's operations — including suppliers, customers, contractors, business partners and distributors.
- Promote responsible and sustainable practices, sharing these commitments throughout the value chain based on proportionality criteria and levels of influence, supported by collaboration with different stakeholders and continuous improvement.
- Strive for customer satisfaction by prioritising innovation, needs analysis and continuous improvement, while assessing and minimising environmental and social impacts.

Communities and environment

- Analyse and manage the Company's impacts on the communities in which it operates, recognising their right to a healthy environment.
- Promote their development through the creation of shared value and the establishment of partnerships.
- Develop consultation and engagement processes with stakeholders to identify sustainability-related impacts, risks and opportunities and to define appropriate prevention and mitigation measures.
- Establish and implement mechanisms to verify compliance with corporate sustainability policies, procedures and controls.

Occupational Health and Safety Policy

Scope of application

- All subsidiaries, production plants, logistics centres and commercial offices of the Group, in all countries in which it operates..
- All individuals carrying out their activities under the direct operational supervision or control of the Group, including its own employees and those of contractors and subcontractors operating at its facilities.
- TUBACEX extends its sustainability expectations to suppliers, contractors, business partners and distributors, promoting the progressive integration of practices aligned with the Group's values and principles.

Framework for action

- United Nations 2030 Agenda and Sustainable Development Goals (SDGs).
- United Nations Guiding Principles on Business and Human Rights (2011).
- OECD Guidelines for Multinational Enterprises (2011).
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998, updated 2022).
- Paris Agreement and United Nations Framework Convention on Climate Change.

Strategic objectives

- Ensure full coverage of health surveillance, guaranteeing comprehensive protection —physical, mental, ergonomic and psychosocial— for all individuals working under the Group's operational control.
- Improve people's well-being by addressing physical, mental and social factors, as well as work-life balance.
- Promote a preventive culture across the value chain, encouraging awareness, the exchange of best practices and the progressive improvement of health and safety management among business partners.
- Define, review and, where appropriate, update leading and lagging performance indicators in health and safety, enabling the evaluation of the effectiveness of the management system, the anticipation of risks before they materialise and the guidance of decision-making. These indicators will be used to establish quantifiable improvement targets in the short, medium and long term, facilitating the monitoring of progress in risk reduction and preventive performance.
- Actively work, throughout the entire lifecycle, to ensure that all products manufactured and marketed are safe and comply with the most stringent product safety regulations.

Commitments

- Leadership and governance. The Board of Directors and Senior Management assume responsibility for occupational health and safety, ensuring sufficient resources and the integration of health and safety into the Group's strategy.
- Participation and consultation. Promote the participation of employees, contractors and business partners in all decisions relating to occupational health and safety. Visible and exemplary leadership by management and middle management will be encouraged, strengthening the preventive culture and collective learning.
  Prevention and operational control. Implement management systems that ensure the elimination or mitigation of risks, continuous training and the competence of all personnel. Guarantee the availability of appropriate human, technical, financial and digital resources to eliminate hazards, control risks and promote well-being.
- Well-being and health surveillance. Develop medical surveillance and comprehensive well-being programmes, promoting inclusion, diversity and work-life balance. Implement continuous health monitoring systems and job–person fit assessments, covering physical, mental, ergonomic and psychosocial dimensions.
- Responsible value chain. The Company will extend its health and safety expectations to suppliers, business partners and other entities within the value chain, encouraging the adoption of practices consistent with the principles set out in this Policy and supporting the progressive development of preventive capabilities and compliance with applicable local regulations. To this end, the Group will promote dialogue and collaboration to share expectations, improve preventive coordination and contribute to strengthening the safety culture across its value chain.
- Emergency preparedness and response. Maintain response plans for industrial, climate-related and health emergencies, which are periodically reviewed and tested.
- Continuous improvement and transparency. Periodically assess performance, analyse root causes of incidents, share lessons learned and review this Policy to ensure its ongoing relevance.

Environmental and Climate Action Policy

Scope of application

- All subsidiaries, production plants, logistics centres and commercial offices of the Group, in all countries in which it operates.
- TUBACEX extends its sustainability expectations to suppliers, contractors, business partners and distributors, promoting the progressive integration of practices aligned with the Group's values and principles.

Framework for action

- Sustainability Policy.
- European Green Deal.
- European Union Green Taxonomy.
- United Nations 2030 Agenda.
- Corporate Sustainability Reporting Directive (CSRD).

Commitments

Energy transition and climate change

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

Responsible management of natural resources

- Protect the environment and prevent pollution of air, water, soil and noise, and manage waste and hazardous substances appropriately.
- Maintain effective water and emissions treatment systems, ensuring compliance with and, where possible, exceeding applicable environmental standards.
- Continuously improve water-use efficiency by 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

- Promote circularity by increasing, where possible, the use of recycled materials and encouraging the reuse, recovery and recycling of waste throughout the value chain.
- Minimise, as far as possible, the generation of all types of waste, preventing waste generation at source.
- Adopt the necessary measures to improve the efficiency of the use of raw and auxiliary materials.
- Promote collaboration with universities, technology centres and customers to advance circular and low-carbon solutions.
- Foster research and development of clean technologies, sustainable materials and innovative solutions to reduce environmental footprint.

Protection of biodiversity and ecosystems

- Protect and preserve biodiversity by implementing measures to avoid or minimise the impact of industrial activities on the ecosystems in which the Group operates, ensuring the prevention of deforestation and the degradation of natural habitats, and promoting responsible land and natural resource management practices.
- Extend these biodiversity protection requirements across the value chain, covering areas of national and international ecological importance.
- Assess potential impacts arising from changes in the Group's activities, applying the mitigation hierarchy: avoid, minimise, restore and offset.

General Human Rights Policy

Scope of application

- All subsidiaries, production plants, logistics centres and commercial offices of the Group, in all countries in which it operates.
- All activities and business functions carried out by TUBACEX and its employees, as well as by governing and supervisory bodies in the exercise of their responsibilities.
- TUBACEX extends its sustainability expectations to suppliers, contractors, business partners and distributors, promoting the progressive integration of practices aligned with the Group's values and principles.

Framework for action

- United Nations Guiding Principles on Business and Human Rights.
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.
- The Ten Principles of the United Nations Global Compact.
- Directive (EU) 2024/1760 on Corporate Sustainability Due Diligence (CSDDD), as well as the applicable national transposing legislation.

Commitments

Freedom and well-being of individuals

- Abolish child labour, ensuring compliance with applicable international and national regulations on minimum working age, applying the most stringent internal standards where these provide greater protection for children and ensure better compliance with this commitment.
- Expressly prohibit all forms of human trafficking, forced labour or modern slavery.
- Prohibit inhumane, degrading or violent treatment, as well as any form of harassment or intimidation in the workplace.
- Ensure dignified treatment and respect for the physical, moral and psychological integrity of all individuals.
  Respect the right to privacy and the protection of personal data, avoiding any arbitrary interference in individuals' private life, correspondence or reputation, and ensuring that information management is carried out in accordance with applicable data protection regulations and the Group's internal policies.

Decent work and fair working conditions

- Promote fair, safe, healthy and equitable working conditions, in line with the TUBACEX Occupational Health and Safety Policy and ILO conventions on workplace safety and well-being.
- Ensure a living wage and equal pay between women and men.
- Respect maximum working hours and rest periods, paid leave, and appropriate consultation processes in the event of significant changes in employment or work organisation.
- Recognise and protect freedom of association, the right to collective bargaining, the right to strike and active participation, without interference or retaliation.
- Promote social dialogue with employees and their representatives, ensuring transparent communication and participation processes.
- Promote social protection for all employees, ensuring access to basic benefits and coverage (health, maternity, disability, old age, unemployment and occupational accidents), contributing to the stability and sustainability of employment.
- Ensure fair and adequate employment and remuneration conditions that provide a decent standard of living for all employees, including effective access to basic resources such as food, housing, education and healthcare.

Equality and non-discrimination

- Eliminate any form of discrimination in employment on the grounds of gender, sexual orientation, origin, nationality, religion, age, disability or any other personal condition, in accordance with the Equality, Equity and Inclusion Policy.
- Ensure equal opportunities and pay equity for work of equal value.
  Promote diversity and inclusion at all stages of the employment lifecycle, in line with the Group's Diversity, Equity and Inclusion Policy.

Communities and indigenous peoples

- Assess actual and potential impacts of operations on the human rights of local communities and indigenous peoples.
- Ensure prior, free and informed consultation processes when projects may affect their territories, resources or ways of life.
- Respect and protect traditional and cultural knowledge as an essential component of social and environmental sustainability.
- Asegurar Ensure the right to a healthy environment, applying the principles of precaution and environmental prevention.

Prevention, mitigation and remediation of impacts

- Avoid causing or contributing to adverse human rights impacts, applying processes of identification, prevention, mitigation and remediation in line with the Human Rights Due Diligence Policy.
- Address actual or potential impacts identified in operations or within the value chain in an appropriate and effective manner, adopting the necessary measures.
- Maintain internal assessment mechanisms and accessible, confidential reporting channels to identify, address and remedy potential breaches.

Equal Opportunities, Non-Discrimination and Inclusion Policy

Scope of application

- Mandatory application to all subsidiaries, investees, production facilities and commercial offices that make up the TUBACEX Group, regardless of their geographical location, from the date of its approval.
- Its principles and commitments are also extended to business relationships, suppliers, contractors and relevant business partners.

Framework for action

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

Commitments

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 salary 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.
- Integrate a gender perspective and intersectional diversity into all management and decision-making processes.
- Identify, prevent and correct potential inequalities or structural barriers, promoting an inclusive and equitable environment that supports the personal and professional development of all employees.

Safe and harassment-free environments

- Promote diversity and eliminate any form of direct or indirect discrimination, 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, fostering inclusive and respectful working environments.
- Provide a universal and global reporting channel —the whistleblowing channel— ensuring accessibility, confidentiality and protection of the reporting individual against retaliation.
- Ensure a defined and confidential escalation process for managing incidents of harassment or discrimination, with different levels of responsibility and clear action protocols.
- Adopt proportionate corrective or disciplinary measures in cases of discriminatory or harassing behaviour, in accordance with the Code of Conduct 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.
- Provide specific training programmes for leaders and middle management to promote inclusive team management and prevent unconscious bias.
- Regularly assess the effectiveness of training programmes and incorporate the results into annual continuous improvement plans.

Diversity, accessibility and work-life balance

- Ensure universal accessibility by removing 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 the reconciliation of personal, family and working life by promoting co-responsibility, flexibility and organisational well-being policies.

Inclusive communication

- Use inclusive language in all corporate communications and institutional materials.
- Reflect the diversity of the Group's workforce in campaigns, training materials and awareness initiatives, avoiding stereotypes or bias

Training and Professional Development Policy

Scope of application

Mandatory application to all subsidiaries, investees, production facilities and commercial offices that make up the TUBACEX Group, regardless of their geographical location, from the date of its approval.

Framework for action

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

Commitments

- Provide employees with the material and intellectual resources necessary to ensure the acquisition of the knowledge and skills required for the proper performance of their roles, as well as to promote their personal and professional development in a safe and inclusive environment.
- Develop training programmes that strengthen technical competencies and raise awareness of human rights, business ethics, and social and environmental sustainability, in line with corporate policies and with the objectives and commitments defined in the Corporate Sustainability Policy.
- Provide an organised structure with a clear and appropriate allocation of functions and responsibilities to facilitate professional development in a transparent and structured manner.
- Ensure that professional development is carried out with full respect for the principles of equality, equity and non-discrimination, in alignment with the Diversity, Equity and Inclusion Policy.
- Maintain open dialogue with employees and/or their representatives to ensure that identified training needs are adequately addressed.
- Ensure strict compliance with regulations related to training in areas such as Occupational Health and Safety and the environment, as well as any other applicable requirements.
- Progressively extend awareness-raising and training actions to suppliers, contractors and relevant business partners, promoting alignment with the Group's values and commitments in human rights, sustainability and responsible business conduct.
- Periodically assess the effectiveness of training and awareness programmes, reviewing their content and methodologies to ensure their alignment with the Company's needs and the areas it seeks to develop in order to achieve its objectives and comply with corporate policies.

Social Action Policy

Scope of application

- This Policy applies to all subsidiaries, facilities and commercial offices that make up the Group, from the date of its approval, regardless of their geographical location, legal nature and/or level of operational dependence.

Framework for action

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

Commitments

Community development

- Develop and maintain social action programmes in the communities where the Group operates, as well as in other priority geographical areas, allocating technical, financial and human resources in line with the principles of sustainability and solidarity.
- Collaborate with local authorities, NGOs, educational institutions and other social stakeholders in the field of social action and the promotion of community development.
- Promote projects that support access to education, employability, health and social inclusion.

Volunteering and internal engagement

- Encourage the active participation of employees in social action programmes, strengthening their sense of belonging and corporate social responsibility.
- Promote internal awareness programmes that reinforce the culture of social action within the Group.

Support for vulnerable groups

- Promote, where possible, collaboration with associations and charitable organisations that support vulnerable groups.
- Allocate resources to initiatives that contribute to improving quality of life and access to development opportunities for the most disadvantaged individuals.

Partnerships and institutional collaboration

- Establish partnerships with local entities and international organisations to develop joint projects aligned with the Sustainable Development Goals (SDGs).
- Align all social action initiatives with the United Nations Guiding Principles on Business and Human Rights, integrating social action within the framework of corporate due diligence.

Transparency, monitoring and evaluation

- Record, assess and report annually on actions and resources allocated to social action, in accordance with the principles of transparency, accountability and continuous improvement.
- Include the results and impact of social initiatives in the Tubacex Group Sustainability Report.
- Establish monitoring and evaluation mechanisms to measure the effectiveness and social impact of the actions undertaken.

Code of Conduct

Scope of application

- Applicable to all directors, executives and employees of TUBACEX, regardless of their contractual relationship, hierarchical or functional position, and the place where they carry out their activities.
- Extended to the entire TUBACEX Group, including the parent company and all its current and future industrial, commercial and service subsidiaries.
- Its principles must also guide relationships with third parties acting on behalf of or in the interest of the Group.

Framework for action

- Applicable legislation in the countries where the Group operates.
- Internal regulations of the Tubacex Group.
- Principles of integrity, legality, transparency and ethical conduct set out in the Code itself.

Commitments

Regulatory compliance and ethical conduct

- Strictly comply with applicable legislation and the Group's internal regulations.
- Act with honesty, integrity and responsibility in all professional activities.
- Reject any conduct contrary to the law or to the Group's ethical principles.

Human rights and respect for individuals

- Ensure equal opportunities and non-discrimination.
- Respect dignity, privacy and individual rights.
- Reject any form of harassment, abuse of authority or intimidating behaviour.

Anti-corruption and conflicts of interest

- Prohibit any form of bribery or corrupt conduct.
- Avoid and disclose situations of conflict of interest.
- Regulate the acceptance and offering of gifts and hospitality in accordance with principles of appropriateness and transparency.

Free competition and business relationships

- Act in accordance with the principles of fair competition.
- Maintain business relationships based on legality, transparency and mutual respect.

Protection of assets and information

- Protect the Group's tangible and intangible assets.
- Ensure the confidentiality of sensitive information.
- Ensure the accuracy and reliability of financial and corporate information.

Safety and working environment

- Promote a safe and respectful working environment.
- Comply with applicable health and safety regulations.

Whistleblowing channel and compliance

- Facilitate the reporting of potential breaches through the Internal Information System.
- Ensure the confidentiality of reports and protection against retaliation for individuals reporting in good faith.
- Monitor compliance with the Code through the competent internal bodies.

Corporate Policy on the Internal Information System

Scope of application

- Applicable to the parent company Tubacex, S.A. and to all its subsidiaries, and therefore applicable across the entire Tubacex Group.
- Mandatory for all directors, executives, professionals or individuals with a hierarchical reporting relationship with Tubacex, regardless of their functional or hierarchical position or the territory in which they operate.
  Its use is also encouraged for any natural or legal person who has had, has or may have an employment or professional relationship or collaboration with Tubacex.

Framework for action

- Law 2/2023 of 20 February on the protection of individuals reporting regulatory infringements and on the fight against corruption.
- Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law.
- Applicable current legislation.
-

Commitments

- Ensure a formal channel for reporting serious or very serious criminal or administrative offences, breaches of the Code of Conduct and other internal regulations, as well as breaches of European Union law falling within the scope of Directive (EU) 2019/1937.
- Allow reports to be submitted in writing or verbally, including the possibility of an in-person meeting with the person responsible for the System or with designated external managers.
- Ensure the confidentiality of the identity of the reporting individual and of any third party mentioned in the report, as well as of all actions taken in its handling.
- Allow the submission of anonymous reports.
- Expressly prohibit any form of direct or indirect retaliation against individuals reporting in good faith.
- Guarantee the rights of defence, the presumption of innocence and the honour of individuals affected by a report.
- Require that reports are made in good faith, expressly prohibiting false or malicious reports.
- Appoint the person responsible for the Internal Information System, designated by the Board of Directors, who shall act with autonomy and independence in the performance of their duties.
- Ensure traceability and security in the management of received reports.

Privacy Policy

Scope of application

- Applicable to Tubacex, S.A., as data controller, and to the companies that make up the Tubacex Group.
- • Addressed to professionals and external collaborators who use the Whistleblowing Channel.
  • Applies to the processing of data relating to the reporting individual, the reported individual and third parties involved (e.g. witnesses).

Framework for action

- Regulation (EU) 2016/679 (GDPR).
- Organic Law 3/2018 on Personal Data Protection and the guarantee of digital rights.
- Law 2/2023 on the protection of individuals reporting regulatory infringements and on the fight against corruption.
  Applicable European and Spanish implementing data protection legislation.

Commitments

Limited and proportionate processing

- Process only the data that are strictly and objectively necessary to handle reports and verify the facts reported.
- Ensure that processed data are adequate, relevant and not excessive.

Purpose and legal basis

- Manage and investigate reports submitted through the Channel.
- Adopt legally established protection measures to prevent potential retaliation in accordance with Law 2/2023.
- Handle and respond to queries submitted through the Channel.
- Prevent, detect and identify potential risks and breaches that may give rise to criminal liability.
- Maintain evidence of the proper functioning of the Criminal Risk Prevention Model.
- Comply with legal obligations when required by regulations or competent authorities.

Data retention

- Retain data for the time strictly necessary to determine whether to initiate an investigation.
- Where applicable, retain data for the duration of the investigation and any related legal actions.
- Delete data three months after receipt if no action has been initiated, except where necessary to demonstrate the functioning of the Channel.
- Retain data in a blocked state to address potential liabilities during statutory limitation periods (up to a maximum of ten years).

Data disclosure

- Restrict access to duly authorised personnel.
- Disclose data only when necessary for the adoption of disciplinary or legal measures.
- Provide data to public authorities where there is a legal obligation.
- Enter into data processing agreements with external providers, imposing strict obligations of confidentiality, security and non-subcontracting without authorisation.

International transfers

- Store and process data, as a general rule, within the European Union.
- In the case of international transfers, base them on adequacy decisions or standard contractual clauses approved by the European Commission.

Data subjects' rights

- Guarantee the exercise of rights of access, rectification, erasure, restriction and objection in accordance with legal provisions.
- Allow withdrawal of consent where the report has been recorded based on express authorisation.
- Ensure that the exercise of rights does not result in disclosure of the reporting individual's identity.

Security and confidentiality

- Apply appropriate technical and organisational measures to ensure an adequate level of security based on risk analysis.
- Carry out data protection impact assessments where necessary.
- Guarantee the confidentiality of the reporting individual's identity.
- Allow anonymous reporting.
- Disclose the identity of the reporting individual only to administrative or judicial authorities where legally required.
- Impose a duty of confidentiality on all individuals who become aware of reports.

Information to involved parties

- Inform the reporting individual, the reported individual and any third parties involved about the processing of their data.
- Inform the reported individual within a maximum of thirty days from the admission of the report for processing, unless this would compromise the investigation, in which case the decision must be duly documented.

Delegado de Protección de Datos

- Appoint a Data Protection Officer responsible for ensuring compliance with data protection regulations and for handling queries in this area.

General Risk Control and Management Policy

Scope of application

- A corporate policy applicable to all companies forming part of the TUBACEX Group.
- Applicable to its directors, executives and professionals involved in risk-related matters.

Framework for action

- Articles 249 bis and 529 ter of the Spanish Companies Act.
- Articles of Association of TUBACEX, S.A.
  Regulations of the Board of Directors and of the Audit and Compliance Committee.

Commitments

Purpose and objective

- Establish the basic principles and the general framework for the control and management of risks of any nature faced by the Company and the Group.
- Approve the risk appetite and develop the necessary capabilities to ensure that relevant risks are properly identified, measured, managed and controlled.
- Manage the risk–opportunity balance at a level of risk that allows:
  - The achievement of strategic objectives with controlled volatility.
  - The provision of the highest level of assurance to shareholders.
  - The guarantee of business stability and sustained financial soundness.
  - The protection of the Group's results and reputation.
  - The reduction of negative impacts on the Company's economic activity

Definition of risk factors

The Policy identifies the following risk factors:

- Business risks.
- Market risks (exchange rate, interest rate, solvency, liquidity, inflation, raw material prices, etc.).
- Operational, technological, environmental, social and legal risks (including cybersecurity, health and safety, regulatory compliance, fraud and corruption, litigation, among others).
- Corporate governance, ethics and compliance risks.
- Credit risks.
- Strategy and innovation risks.
- Regulatory and political risks.
- Reputational risks.

General principles of action

- Integrate the risk–opportunity perspective into strategy and decision-making.
- Create value for stakeholders through effective risk and opportunity management.
- Manage risk in a continuous, dynamic and iterative manner.
- Segregate functions between risk-taking areas and control and supervisory areas.
- Report and quantify risks to regulators and external stakeholders.
- Ensure the appropriate use of hedging instruments.
- Act in accordance with the values set out in the Code of Conduct and the Crime Prevention Policy.
- Ensure compliance with corporate governance standards and their ongoing update.

Integrated risk control and management system

The Policy is implemented through a system that includes:

- Continuous identification of relevant risks.
- Periodic analysis and review of deviations from approved limits.
- Economic assessment of impact and preparation of a corporate risk map, identifying the ultimate owner of each risk.
- Analysis of risks associated with new investments.
- Periodic monitoring and control to limit annual earnings volatility.
- Internal control system and contingency plans.

The system is structured around three lines of defence:

- Audit and Compliance Committee (in coordination with the Sustainability and Good Governance Committee on ESG matters).
- Internal Audit Department.
- Executive Committee.

Supplier Code of Conduct

Scope of application

- Applicable to all manufacturers and suppliers involved in the procurement, manufacturing and finishing processes of products marketed by Tubacex.
- Extended to any third party to whom the supplier subcontracts work, subject to prior written authorisation from Tubacex.
- Also applicable to homeworkers involved in the supply chain.

Framework for action

- Applicable local, national and international legislation.
- Applicable collective bargaining agreements where they provide greater protection for workers.
- Minimum standards defined in this Code.

Commitments

General principles

- Carry out activities in an ethical and responsible manner.
- Treat fairly and with dignity all individuals who maintain a relationship with Tubacex.
- Act with respect for the environment.

Labour rights and working conditions

- Do not permit any form of forced or involuntary labour.
- Do not employ minors (defined as persons under 16 years of age, unless local legislation establishes a higher minimum age).
- Do not apply discriminatory practices in recruitment, compensation, training, promotion or termination of employment.
- Ensure freedom of association, trade union membership and collective bargaining, without retaliation.
- Do not permit harsh or inhumane treatment.
- Provide safe and hygienic working conditions, including adequate lighting, ventilation, hygiene, fire prevention and access to drinking water.
- Provide regular training on health and safety matters.
- Pay wages at least in accordance with the applicable legal minimum wage or collective agreement.
- Do not apply disciplinary wage deductions not provided for by law.
- Ensure that working hours comply with applicable legislation and avoid excessive working hours (not exceeding 48 hours per week as a general rule, ensuring one day of rest per week and limiting overtime to 12 hours per week).
- Ensure that overtime is voluntary and remunerated in accordance with applicable regulations.
- Ensure regular employment in accordance with applicable labour and social security legislation.

Supply chain and traceability

- Do not subcontract without prior written authorisation from Tubacex.
- Assume responsibility for compliance with the Code by subcontracted third parties.
- Apply the principles of the Code to homeworkers.
- Provide transparency regarding locations and working conditions.

Product safety

- Ensure that all products supplied comply with the health and safety standards established by Tubacex.

Environment

- Comply at all times with applicable environmental legislation.
- Comply with the environmental standards established by Tubacex.
- Adopt measures to reduce and, where appropriate, offset environmental impacts.

Confidentiality

- Preserve the integrity and confidentiality of information received within the framework of the business relationship.
- Maintain confidentiality obligations even after the termination of the contractual relationship.
- Return Company materials where appropriate.

Implementation and verification

- Implement and maintain internal programmes to enforce the Code.
- Designate a senior management member responsible for its implementation.
- Communicate the Code to employees and individuals involved in the supply chain.
- Authorise Tubacex and/or designated third parties to verify compliance with the Code.
- Provide access to facilities and documentation for such verification.

Transparency and prevention of corruption

- Act in an honest and transparent manner.
- Maintain appropriate accounting records to ensure traceability of decisions.
- Do not manipulate records or influence employees to alter verification processes.
- Do not offer or accept payments that could affect the impartiality of audits or inspections.

Annex IV. Supplementary sustainability information relating to non-material matters

1.1 Biodiversity

Although biodiversity is not considered a material aspect for the sector or for Tubacex, the Company recognises its importance due to the interconnection between environmental elements and its role in maintaining ecosystem balance. Within this context, it is implementing a decarbonisation plan with direct effects on the natural environment, integrating biodiversity management in a cross-cutting manner within its overall strategy.

One of the projects included within this approach is the assessment of Operational Performance Indicators related to biodiversity, the purpose of which is to analyse and measure the impact of its operations on the ecosystems of the regions in which it operates.

The objective of this project is to carry out a comprehensive analysis of how its activities may influence biodiversity, identifying risks, opportunities and potential effects on local species and ecosystems. To this end, it uses advanced monitoring and analysis tools that enable the collection of accurate information on the state of biodiversity in areas linked to its operations.

1.1.1 Material impacts, risks and opportunities and their interaction with the strategy and business model

Tubacex conducts a general analysis of risks and opportunities related to biodiversity, taking as a reference recognised international frameworks (TNFD, IPCC) and sectoral tools such as ENCORE and WWF Risk Filters, applying internal materiality criteria.

The analysis considers:

- Physical risks, mainly linked to potential impacts on water resources or ecosystems located near certain facilities. In the locations analysed, no significant impacts arising from the activity have been identified, beyond potential risks mitigated through already implemented environmental control and prevention systems.
    - **Inherent risk**: threat × exposure × sensitivity.
    - **Residual risk**: threat × exposure × vulnerability.
- Transition risks, mainly associated with regulatory changes, market expectations or potential reputational impacts related to nature protection. These risks are considered to be of low criticality due to existing environmental management systems.
    - **Transition risk = probability × impact.**
- Opportunities, related to strengthening sustainability positioning, improving resource-use efficiency and the potential application of nature-based solutions at own facilities, where technically and economically feasible.
    - **Opportunity = potential × effectiveness.**

In line with its non-material nature, this aspect is managed through continuous assessment and monitoring mechanisms, applying a progressive improvement approach proportionate to the level of identified risk.

1.1.2 Policies related to biodiversity and ecosystems

Aligned with the commitments set out in its sustainability plan, Tubacex has an Environmental and Climate Action Policy which specifies the commitments associated with the main environmental challenges and opportunities, including biodiversity. In this way, the Company recognises 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 in a manner that respects the ecological balance of the environments in which it operates. More specifically:

- Protect and preserve biodiversity by implementing measures to avoid or minimise the impact of industrial activities 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.
- Extend these biodiversity protection requirements throughout the value chain, covering any areas of national or international ecological importance.
- Assess potential impacts arising from changes in the Group's activities, applying the mitigation hierarchy: avoid, minimise, restore and offset.

This policy was approved in December 2025 by the Board of Directors.

Annex V. European Taxonomy of environmentally sustainable activities

1.2 Eligibility criteria:

Taxonomically Eligible Activities	An economic activity eligible under the aforementioned Taxonomy is defined as an activity that can potentially contribute to one or more of the environmental objectives established therein: - Climate change mitigation. - Climate change adaptation. - The sustainable use and protection of water and marine resources. - The transition to a circular economy, including waste prevention and the promotion of reuse and recycling. - Pollution prevention and control. - The protection and restoration of biodiversity and ecosystems.

After analysing the various delegated regulations referred to above, the eligibility assessment criteria established in 2022 have been maintained. Accordingly, for the climate change mitigation objective, only steel manufacturing activities (ACERÁLAVA and products from this plant marketed through TSS) are considered eligible, while other entities engaged in the production of tubes and other tubular products, machined products or other services complementary to the final product are excluded from this eligibility.

This eligible activity corresponds to item 3.9 “Manufacture of iron and steel” in Annex I of Delegated Regulation 2139/2021 and is considered a transitional activity under Article 10(2) of Regulation (EU) 2020/852.

1.3 Alignment criteria:

Taxonomically Aligned Activities	An economic activity aligned with the Taxonomy is an economic activity that meets all the requirements set out in the Taxonomy Regulation: - To contribute substantially to one of the environmental objectives: climate change mitigation, climate change adaptation, the protection of water and marine resources, the transition to a circular economy; pollution prevention and control; and the protection and restoration of biodiversity and ecosystems. - The “do no significant harm” assessment: This evaluation is intended to ensure that the Taxonomy itself does not include economic activities that undermine any of the other five environmental objectives. - To comply with minimum social safeguards: Compliance is required with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

In line with the criteria defined for the eligibility assessment, the scope of the alignment evaluation focuses on the manufacture of long stainless steel products carried out by the Group’s steel plant, ACERÁLAVA, and the products from this plant marketed through TSS.

Compliance in this case is achieved through the use of scrap in EAF (Electric Arc Furnace) processes, as it represents more than 70% of crude steel[1] production.

1.4 Alignment with the technical screening criteria for climate change mitigation:

Table 1. Alignment

CLIMATE CHANGE MITIGATION	
NACE code of the activity?	24.10
Consumption of scrap[2] in EAF furnaces, is it greater than the following thresholds?	
i) 70% of crude steel production	Yes

1.5 Do no significant harm (DNSH):

Table 2. DNSH

CLIMATE CHANGE ADAPTATION		
The assessment (identification, classification and evaluation) of physical risks related to climate change has been carried out, identifying and materialising vulnerabilities, as well as the solutions for adapting the activities under analysis to them.	Yes	Tubacex has carried out an analysis that determines the climate risks to which the company is exposed and its vulnerability to them. This analysis (detailed in section E1 of this report) has resulted in an impact matrix highlighting: **Climate risks:** • **Physical risks.** The main risk identified under the SSP5-8.5 scenario is water scarcity (hydrological), with an impact on production (reduction in production capacity, high investment costs, impact on orders). • **Transition risks.** The main transition risks affecting the steel plant are determined by current regulations. Thus, the tightening of material import requirements under the CBAM, or carbon pricing mechanisms, were the most significant. Impact on the business: An analysis of the impact on the business was carried out, assessing, on the one hand, the lost revenue in water restriction scenarios (one month or three months of supply cuts), quantifying the volume of production that could be affected. On the other hand, with regard to regulatory risks, an analysis of the impact of carbon prices and their effect on production projections has been carried out.
The risk assessment includes climate projections adapted to the characteristics of the activities under analysis.	Yes	The Tubacex Group has incorporated climate and transition risks into its overall risk model. Since 2024, it has updated its climate risk and opportunity assessment model, considering the recommendations of the IPCC and analysing the impact on its activity under the following Shared Socioeconomic Pathways (SSPs): SSP2-4.5 (baseline scenario); SSP3-7.0 (high greenhouse gas emissions scenario); and SSP5-8.5 (very high greenhouse gas emissions scenario). The assessment has been carried out by evaluating, on the one hand, physical risks (acute and chronic), resulting from the effects of climate change on the activity,

[1] This indicator is calculated as the percentage of internal and external scrap relative to the final product manufactured (ingot).

		and, on the other hand, transition risks, resulting from the impacts of a transition towards a low-carbon economy. Physical risks have been analysed across three different time horizons – short term (2020–2039), medium term (2040–2059) and long term (2080–2099) – identifying their possible sources and assessing the climate threat in accordance with climate projections for the SSP5-8.5 scenario across the different time horizons. For this purpose, material locations with the highest degree of exposure to risk and their vulnerability have been considered, taking into account the sensitivity of the facilities and their activity, as well as their capacity to adapt to climate threats. For transition risks and opportunities, the "Paris Agreement Climate Neutrality Target" scenario has been considered, based on IPCC SSP1-2.6, and the IEA Net Zero Emissions by 2050 scenario in the short term (2024–2030), medium term (2031–2040) and long term (2041–2050), following the classification typology established by the Task Force on Climate-related Financial Disclosures (TCFD) and the Carbon Disclosure Project. Thus, transition risks include the following typologies: current regulation, emerging regulation, technology, market and reputational; and opportunities are defined based on: resource efficiency, energy source, products and services, market, and resilience. This analysis has been complemented by an assessment of the financial impact of those risks and opportunities identified as priorities for Tubacex in the short term, and under the most critical scenarios.
An implementation plan for the proposed solutions has been established.	Yes	At the facilities under analysis, an assessment has been carried out of the impact of these projections, analysing, on the one hand, the risk assessment based on the aforementioned projections and, on the other hand, the impact on the business by assessing the impact on operations. • In the case of the material risks identified (water supply interruptions), the solutions plan involves more efficient resource management and a culture of responsible consumption. In storage centres, water does not represent a material asset as it is not part of the production process.
Water and marine resources:		
A water risk assessment has been carried out (both as a resource and as a receiving environment).	Yes	The facility under analysis has carried out environmental impact assessments that include a water risk assessment. ACERÁLAVA has Environmental Risk Analysis Reports (ARA). The methodology applied corresponds to that established in UNE Standard 150008:2008 on environmental risk analysis and assessment, with regard to conducting risk analyses, in accordance with the provisions of Royal Decree 2090/2008 on Environmental Liability. In addition, a complementary analysis of risks and opportunities relating to water resources has been carried out (further information in section E3). The risks analysed are as follows: • Water quality degradation • Habitat degradation • Loss of species • Risk of water supply shortage • Drought • Reduced availability of water for industrial processes • Pollution generated by discharges into water systems In the case of TSS, water is not considered a material aspect of management, as no production process is carried out.
A management plan for the use and protection of water has been developed.	Yes	The Environmental Risk Analysis Report (ARA) includes management plans for the use and protection of water, among other material aspects.
Integrated pollution prevention and control:		

Justification is provided that the installation does not manufacture, market or use any of the substances listed in points (a)–(g) of Appendix C of Annex I to Delegated Regulation (EU) 2021/2139..	Yes	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 Best Available Techniques (BAT) in steel production pursuant to Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions. Specifically, BAT relating to the management of atmospheric emissions for steel manufacturing processes and casting in basic oxygen converters and/or electric arc furnace processes. Emissions are below the legal emission limits established by Directive (EU) 2015/2193 for the steel industry[1].
Biodiversity and ecosystems		
An Environmental Impact Assessment (Directive 2011/92/EU) has been carried out.	Yes	ACERÁLAVA has carried out environmental impact assessments that include an assessment of biodiversity and ecosystems. The methodology applied in the Environmental Risk Analysis corresponds to that established in UNE Standard 150008:2008 on environmental risk analysis and assessment, with regard to conducting risk analyses, in accordance with the provisions of Royal Decree 2090/2008 on Environmental Liability. In the case of the warehouses forming part of the TSS unit, there is no significant impact on the environment due to the nature of the activities carried out. In terms of biodiversity impact, they are located in industrial areas that carry out their corresponding environmental impact assessments and, therefore, are outside any area considered protected. Although biodiversity was not considered a material aspect in the 2024 and 2025 materiality analyses, Tubacex has incorporated this element into its environmental risk analysis (further information in Annex I). Thus, in line with the GAP analysis carried out for compliance with the new reporting Directive (CSRD), Tubacex has incorporated the impact on biodiversity and ecosystems within the scope of analysis.

(1) Sources

• Commission Implementing Decision 2012/135/EU of 28 February 2012 establishing the best available techniques (BAT) conclusions for iron and steel production under Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions (OJ L 70, 8.3.2012, p. 63).
• Best Available Techniques (BAT) conclusions for the iron and steel industry: https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/medio-ambiente-industrial/isbatconclusions_tcm30-191333.pdf
• Best Available Techniques (BAT) Reference Document for Iron and Steel Production: https://prtr-es.es/Data/images/IronandSteelBREFDEI.pdfDecisión de Ejecución 2012/135/UE de la Comisión, de 28 de febrero de 2012, por la que se establecen las conclusiones sobre las mejores tecnologías disponibles (MTD) en la producción siderúrgica conforme a la Directiva 2010/75/UE del Parlamento Europeo y del Consejo, sobre las emisiones industriales, (DO L 70 de 8.3.2012, p. 63).

1.6 Compliance with minimum social safeguards

Table 3. Social safeguards

Occupational Health and Safety	
Regulatory framework for action	Fundamental principles of the Universal Declaration of Human Rights, the International Labour Organization, the OECD Guidelines for Multinational Enterprises, and the principles of the United Nations Global Compact.
Management framework	• In December 2025, the organisation launched a revision of its Occupational Health and Safety Policy, signed by the Board of Directors, including the commitments undertaken in this area. • It also has a management process focused on Health and Safety and action plans aimed at minimising the impact of its activities on human resources. • The facilities under analysis have an Occupational Risk Prevention Programme certified under ISO 45001.

Reference in this document	Section 3.1.2 Policies related to own workforce, 3.1.15 Health and safety parameters
Human Rights	
Regulatory framework for action	National and international regulatory frameworks. As a participant in the United Nations Global Compact, Tubacex supports the Ten Principles on Human Rights, Labour, Environment and Anti-Corruption; the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the fundamental principles and rights of the International Labour Organization (ILO). The Company strives to adhere to the principles set out in these standards, aligned with those aspects applicable to Tubacex, and to comply with all applicable laws wherever it operates.
Management framework	• In December 2025, the organisation launched a revision of its general Human Rights Policy, signed by the Board of Directors, including the commitments undertaken in this area. • It also has a process for internal analysis (own locations; further information in section S1 of this report) of potential impacts in this area, a governance system with direct responsibilities, a management system focused on prevention, and a whistleblowing channel to report potential breaches and implement mitigation measures. In 2024, Tubacex initiated a specific Human Rights Due Diligence project, involving all Group companies. During 2025, it continued to develop the model. It should also be noted that the company carries out actions with a positive impact on this group through the Tubacex Foundation, as described in the section on affected communities of this report.
Reference in this document	Sections S1, S2 y S3
ANTI-CORRUPTION AND BRIBERY	
Regulatory framework for action	Tubacex conducts its activities in strict compliance with applicable regulations on the prevention of and fight against corruption. Its activities are based on the principles of legality and the fight against corruption in all its forms and, in particular, it rejects any practice that may be considered irregular in the conduct of its business relationships.
Management framework	• The company promotes the principles set out in its Code of Conduct and extends this commitment to all companies within the Group and those with which it maintains business relationships. • As a mechanism for monitoring policies related to the fight against corruption and bribery, the Audit and Compliance Committee is expressly entrusted with ensuring compliance with applicable legislation, as well as internal regulations adopted by the Board of Directors, and with overseeing matters related to business ethics within the Group.
Reference in this document	Section G1
TAXATION	
Regulatory framework for action	The Tubacex Group is firmly committed to complying with the corporate governance policies it has adopted within the framework of its corporate social responsibility, with the aim of contributing voluntarily and actively in the areas of environment, society and the economy.
Management framework	In this context, the Tubacex Group updated its Corporate Tax Policy in December 2023, with the aim of setting out its tax strategy and ensuring control of financial and non-

	financial risks, as well as compliance with good tax practices by the companies and professionals within the Group. In particular, the Corporate Tax Policy pursues the following objectives: • To comply with corporate governance policies. • To ensure proper compliance with tax regulations. • To strengthen good tax practices. The actions of the Tubacex Group are guided by the following general principles: • Proper and ongoing compliance with tax obligations established under applicable tax regulations in each jurisdiction. • Adherence to the recommendations of codes of good tax practices implemented in the jurisdictions in which it operates, taking into account specific needs and circumstances. • Prevention and reduction of significant tax risks, ensuring that taxation is appropriately aligned with the structure and location of activities, human and material resources, and business risks. •
Reference to this document	Anexo I. Estado de información no financiera consolidado
FAIR COMPETITION	
Regulatory framework for action	Tubacex promotes a governance model for responsible business, fostering and promoting mechanisms that ensure good practices in governance, legal compliance, ethics, and the prevention of corruption and bribery, seeking the strictest compliance with national and international legislation in all markets and locations in which it operates. The company operates within the legal framework applicable to the countries in which it carries out its activities, fully complying with both its spirit and purpose.
Management framework	As established in its Code of Conduct, the company is committed to fair competition in the markets. The behaviours to be avoided by employees in this area are shared through this channel, which is publicly available.
Reference in this document	Section G1 Governance Information.

1.7 Key performance indicators

1.7.1 Calculation methodology:

For the calculation of the indicators, the sales of ACERÁLAVA to third parties, as well as the sales of the trading companies (TSS) of steel (eligible activity) in relation to other products (non-eligible activity), are considered eligible and, in accordance with the analysis carried out, aligned. For this purpose, TSS sales have been considered "by origin of material" (ACERÁLAVA).

For CapEx and OpEx, the corresponding items of ACERÁLAVA are taken into account, along with the proportion of TSS used for the related activity. The calculation will be carried out in accordance with the following criteria:

Table 4. Key performance indicators

INDICATORS	DESCRIPTION
Revenue *(Note 6 of the Annual Accounts)*	Proportion of revenue derived from eligible activities (numerator) over the company's total revenue (denominator), excluding intercompany sales.

INDICATORS	DESCRIPTION
OpEx *(Note 23 of the Annual Accounts)*	Proportion of taxonomy-eligible OpEx (numerator) over total taxonomy OpEx (denominator). The latter includes the aggregation of non-capitalised direct costs related to activities and to R&D, maintenance and repair expenses, and environmental management expenses, necessary to ensure the continued and effective functioning of assets, which is why they are considered material, without taking into account their eligibility. Short-term leases are excluded, as they are intercompany transactions.
CapEx *(Notes 7 of the Annual Accounts)*	Proportion of fixed assets invested in eligible economic activities (numerator) over the total assets acquired during the corresponding financial year (denominator). The latter includes the sum of all additions to tangible and intangible assets before depreciation, amortisation and any revaluation, including those additions resulting from business combinations, without considering the eligibility of the activities and excluding leases that do not give rise to the recognition of a right-of-use asset.

The percentages of eligibility and alignment in revenue, OpEx and CapEx for the climate change mitigation objective are detailed below, as no activities have been identified in relation to the remaining environmental objectives.

1.7.2 Results

Table 5. Sales (DP 40 d i)

2025		Revenue (%)	Revenue (Thousands of €)
Eligible	Aligned (1)	8.21	59,055.4
	Not aligned (2)		
Not eligible (3)		91.79	660,201.4
TOTAL		100	719,256.8

2024		Revenue (%)	Revenue (Thousands of €)
Eligible	Aligned (1)	11.0	84,451.5
	Not aligned (2)		
Not eligible (3)		89.00	683,089.3
TOTAL		100	767,540.8

(1) Turnover from environmentally sustainable activities (aligned with the Taxonomy)
(2) Turnover from Taxonomy-eligible activities that are not environmentally sustainable (activities not aligned with the Taxonomy)
(3) Turnover from activities not eligible under the Taxonomy

Table 6. CapEx (DP 16c)

2025		CapEx (%)	CapEx (Thousands of €)
Eligible	Aligned (1)	10.22	6,544
	Not aligned (2)		
Not eligible (3)		89.78	57,491
TOTAL		100	64,035

2024		CapEx (%)	CapEx (Thousands of €)
Eligible	Aligned (1)	4.42	2,790
	Not aligned (2)		
Not elegible (3)		95.58	60,323
TOTAL		100	63,113

(1) CapEx from environmentally sustainable activities (aligned with the Taxonomy)
(2) CapEx from Taxonomy-eligible activities that are not environmentally sustainable (activities not aligned with the

Taxonomy)
(3) CapEx from activities not eligible under the Taxonomy

Table 7. OpEx (DP 16c)

2025		OpEx (%)	OpEx (Thousands of €)
Eligible	Aligned (1)	31.19	9,452
	Not aligned (2)		
Not eligible (3)		68.81	20,856
TOTAL		100	30,308

2024		OpEx (%)	OpEx (Thousands of €)
Eligible	Aligned (1)	55.1	12,587
	Not aligned (2)		
Not eligible (3)		44.90	10,247
TOTAL		100	22,834*

(1) OpEx from environmentally sustainable activities (aligned with the Taxonomy)
(2) OpEx from Taxonomy-eligible activities that are not environmentally sustainable (activities not aligned with the Taxonomy)
(3) OpEx from activities not eligible under the Taxonomy

*The total OpEx figure for the 2024 financial year has been updated, changing from EUR 26,626 thousand reported in 2025 to EUR 22,834 thousand, in line with the published annual accounts, with aligned activities increasing from 24.10% to 55.1%.
In order to comply with Annex III of Delegated Regulation (EU) 2022/1214, the following table of activities related to nuclear energy is presented:

Table 8. Activities related to nuclear energy and fossil gas

ANNEX XII		
Template 1: Activities related to nuclear energy and fossil gas		
	Activities related to nuclear energy	
1	The company carries out, finances or has exposures to the research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal fuel cycle waste.	NO
2.	The company carries out, finances or has exposures to the construction and safe operation of new nuclear facilities to produce electricity or process heat, including for district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using the best available technologies.	NO
3.	The company carries out, finances or has exposures to the safe operation of existing nuclear facilities that produce electricity or process heat, including for district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
	Activities related to fossil gas	
4.	The company carries out, finances or has exposures to the construction or operation of electricity generation facilities that produce electricity from gaseous fossil fuels.	NO
5.	The company carries out, finances or has exposures to the construction, refurbishment and operation of combined heat/cooling and power generation facilities using gaseous fossil fuels.	NO

6.	The company carries out, finances or has exposures to the construction, refurbishment and operation of heat generation facilities that produce heat/cooling from gaseous fossil fuels.	NO

Table 9. Proportion of turnover derived from products or services associated with economic activities aligned with the taxonomy – disclosure for the year 2025

Financial year 2025	Year			Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	Turnover (3)	Proportion of Turnover, year 2025 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.)turnover, year 2024(18)	Category enabling activity (19)	Category transitional activity (20)
Text		M	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Iron and Steel Manufacturing	**CCM 3.9***	59055,4	8,21%	$	N	N/EL	N/EL	N/EL	N/EL	$	$	$	$	$	$	$	11,00%		T
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		59055,4	8,21%	8,21%	0%	0%	0%	0%	0%	$	$	$	$	$	$	$	11,00%		
Of which Enabling		0	0,00%	0,00%	0%	0%	0%	0%	0%	$	$	$	$	$	$	$	0,00%	F	
Of which Transitional		59055	100%	100%						$	$	$	$	$	$	$	100%		T
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Turnover of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0%	0%	0%	0%	0%	0%	0%								0,0%		
A. Turnover of Taxonomy eligible activities (A.1+A.2)		59055	8,21%	8,21%	0%	0%	0%	0%	0%								11,00%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy non-eligible activities		660201	91,79%																
Total		719256,8	100%																

Proportion of turnover/Total turnover		
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	8,21%	8,21%
CCA	0%	8,21%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

*The activity is eligible for climate change mitigation and adaptation objectives because the description of the activity in the two annexes is the same and an adaptation solutions plan derived from our physical climate risk analysis is in place. However, it only contributes to climate change mitigation.

Table 10. Proportion of CapEx derived from products or services associated with economic activities aligned with the taxonomy – disclosure for the year 2025

Financial year 2025	Year			Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	CAPEX (3)	Proportion of CAPEX, year 2025 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11	Climate Change Adaptation (1	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1) or eligible (A.2.)CAPEX, year 2024(18)	Category enabling activity (19)	Category transitional activity (20)
Text		KI	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Iron and Steel Manufacturing	**CCM 3.9***	6544	10,22%	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	4,42%		T
CAPEX of environmentally sustainable activities (Taxonomy-aligned) (A.1)		6544	10,22%	10,22%	0%	0%	0%	0%	0%	S	S	S	S	S	S	S	4,42%		
Of which Enabling		0	0,00%	0,00%	0%	0%	0%	0%	0%	S	S	S	S	S	S	S	0,00%	F	
Of which Transitional		6544	100%	100%						S	S	S	S	S	S	S	100%		T
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
CAPEX of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0%	0%	0%	0%	0%	0%	0%								0,0%		
A. CAPEX of Taxonomy eligible activities (A.1+A.2)		6544	10,22%	10,22%	0%	0%	0%	0%	0%								4,42%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CAPEX of Taxonomy non-eligible activities		57491	89,781%																
Total		64034,6	100%																

Proportion of CAPEX/Total CAPEX		
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	10,22%	10,22%
CCA	0%	10,22%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

*The activity is eligible for climate change mitigation and adaptation objectives because the description of the activity in the two annexes is the same and an adaptation solutions plan derived from our physical climate risk analysis is in place. However, it only contributes to climate change mitigation.

Table 11. Proportion of OpEx derived from products or services associated with economic activities aligned with the taxonomy – disclosure for the year 2025

Financial year 2025	Year			Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	OPEX (3)	Proportion of OPEX, year 2025 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11	Climate Change Adaptation (1	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.)OPEX, year 2024(18)	Category enabling activity (19)	Category transitional activity (20)
Text		KI	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Iron and Steel Manufacturing	**CCM 3.9***	9452	31,19%	S	N	N/EL	N/EL	N/EL	N/EL	S	S	S	S	S	S	S	24,10%		T
OPEX of environmentally sustainable activities (Taxonomy-aligned) (A.1)		9452	31,19%	31,19%	0%	0%	0%	0%	0%	S	S	S	S	S	S	S	24,10%		
Of which Enabling		0	0,00%	0,00%	0%	0%	0%	0%	0%	S	S	S	S	S	S	S	0,00%	F	
Of which Transitional		9452	100%	100%						S	S	S	S	S	S	S	100%		T
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
OPEX of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0%	0%	0%	0%	0%	0%	0%								0,0%		
A. OPEX of Taxonomy eligible activities (A.1+A.2)		9452	31,19%	31,19%	0%	0%	0%	0%	0%								24,10%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OPEX of Taxonomy non-eligible activities		20855,75	68,81%																
Total		30308,00	100%																

Proportion of OPEX/Total OPEX		
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	31,19%	31,19%
CCA	0%	31,19%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

*The activity is eligible for climate change mitigation and adaptation objectives because the description of the activity in the two annexes is the same and an adaptation solutions plan derived from our physical climate risk analysis is in place. However, it only contributes to climate change mitigation.

Annex VI. Glossary of Terms

Term/Acronym	Definition
AAI	Integrated Environmental Authorisation
CAE	Energy Saving Certificates
COSO	Framework for internal control, risk management and corporate governance (Committee of Sponsoring Organizations of the Treadway Commission)
CSRD	Corporate Sustainability Reporting Directive. Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting
CSDDD	Corporate Sustainability Due Diligence Directive. Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859.
DEFRA	UK Department for Environment, Food & Rural Affairs
DP	Datapoint – information data point under the European Sustainability Reporting Standards (ESRS)
ERM	Enterprise Risk Management (Marco de Gestión del Riesgo Empresarial)
ESG	Environmental, Social and Governance
EU ETS	European Union Emissions Trading System
FTE	Full-Time Equivalent
IRO	Impacts, Risks and Opportunities
IPCC	Intergovernmental Panel on Climate Change
LEAP	Locate, Evaluate, Assess and Prepare. An approach that enables organisations to integrate nature into their strategic decision-making and sustainability reporting.
LTIFR	Lost Time Injury Frequency Rate

Term/Acronym	Definition
MITERD	Ministry for Ecological Transition and the Demographic Challenge
MTD	Best Available Techniques
ESRS	European Sustainability Reporting Standards set out in Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards.
OECD	Organisation for Economic Co-operation and Development
SDGs	Sustainable Development Goals
ILO	International Labour Organization
PVA	Environmental Monitoring Programme
SBTi	Science Based Targets initiative
SCIIS	Internal Control System for Sustainability Information
TCFD	Task Force on Climate-related Financial Disclosures
TNFD	Taskforce on Nature-related Financial Disclosures
GVA	Gross Value Added, as defined in Article 8.5.b of the Official State Gazette (BOE) of 4 May 2022
WWF	World Wide Fund for Nature