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## CORPORATE POLICY ON RESPECT FOR HUMAN RIGHTS

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### 0. Introduction

Tubos Reunidos Group (hereinafter, indistinctly referred to as the “**Group**” or “**TR Group**” or “**Tubos Reunidos**”,) is the Business Group comprising those Companies which, within the meaning established by the Law, form part of a commercial Group of which Tubos Reunidos, S.A. (hereinafter, “**TRSA**”) is the controlling company. References in this Policy to the Tubos Reunidos Group should be understood to apply to each and every one of the individual Companies that comprise it.

The Board of Directors of TRSA is responsible for designing, assessing, and continuously reviewing the Group's long-term Governance and Sustainability System, and specifically for approving and updating its Corporate Policies. Such Policies develop the principles reflected in the internal set of regulations and contain the guidelines governing the conduct of the Group and that of its directors, officers, and employees, ensuring that decision-making is oriented towards such sustainability and the creation of long-term value, always within a legal and ethical framework.

This Policy, like all Group Policies, both Corporate and detailed, applies to all the Companies that make up the Group.

Respect for human rights, as set out in the United Nations Universal Declaration of Human Rights of 10 December 1948 ([www.un.org/es/about-us/universal-declaration-of-human-rights](http://www.un.org/es/about-us/universal-declaration-of-human-rights)) is a fundamental part of the ethical culture and social responsibility of the Tubos Reunidos Group, which has been fully committed, from the beginning of its activities, to supporting, respecting, and protecting the rights of people in all its areas of activity. All Tubos Reunidos Group companies are firmly committed to the fulfilment and defence of human rights in the development of their activities, in any of the countries in which they operate. Likewise, this Human Rights Policy extends to all Tubos Reunidos stakeholders, with the aim of sharing and demanding such commitment in its relations with them.

This Policy forms part of the Tubos Reunidos Group's Corporate Governance System and is aligned with the Corporate Policy on Sustainability in Environmental, Social and Governance Matters, and with the Code of Ethical Conduct, as well as with the United Nations Universal Declaration of Human Rights, the principles of the United Nations Global Compact - to which Tubos Reunidos has officially adhered since 2024 - (<https://unglobalcompact.org/what-is-gc/mission/principles>) and the Sustainable Development Goals (<https://www.un.org/sustainabledevelopment/sustainable-development-goals>), the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (<https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work>) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct ([https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises\\_9789264033979-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises_9789264033979-en.html)).

### 1. Purpose of the Corporate Policy on Respect for Human Rights

TRSA's Board of Directors promotes and approves this Policy, which has been developed taking into account the highest international standards, aware that respect for human rights is a fundamental part of the purpose and values of TR Group companies, and an aspect inextricably linked to the United Nations (UN) 2030 Agenda for Sustainable Development.

The goal of Tubos Reunidos is to respect, in all its activities and business relations, the human rights internationally recognised in legislation, treaties and international standards. To achieve this goal, Tubos Reunidos has established a series of commitments contained in this Policy. The term “respect” implies that it undertakes to make reasonable efforts to: i) identify any risks that threaten human rights, ii) prevent and avoid any activities causing negative impacts on human rights and iii) if they occur, do everything possible to mitigate them or repair the damage caused.

The purpose of this Policy is therefore to formalise the commitment of the Tubos Reunidos Group companies to the human rights recognised in domestic and international legislation, as well as to define the principles to be applied within the perimeter of the TR Group for due diligence in the area of human rights, in accordance with the United Nations Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the principles underpinning the United Nations Global Compact, the conventions of the International Labour Organisation, the Sustainable Development Goals (SDGs) approved by the United Nations (UN), the Company's Code of Ethical Conduct, as well as such documents and texts that may replace or supplement the aforementioned.

## 2. Scope of Application

This Policy applies to all companies of the TR Group, as well as to all directors, officers, employees, or persons who, directly or indirectly, have a relationship with the TR Group, regardless of their functional or hierarchical position (hereinafter, the “**Staff**”).

The professionals of the Group companies shall show strict respect for the human rights recognised in domestic and international legislation in the performance of their activities in all countries in which they operate, and, in particular, shall ensure compliance with this Policy.

All professionals of the Group's companies are expected to act as a first line of defence of human rights, reporting any possible impact on them or any breach of the Code of Ethical Conduct or of this Policy, through the **Whistleblowing Channel** set up in the Internal Whistleblowing System and Protection of the Whistle-blower.

## 3. Main Principles of Conduct

To achieve the aforementioned goals and commitments, the TR Group has adopted and promotes the following main principles, which must govern the conduct of all its member companies and staff in all areas:

### **3.1. Proceed with human rights due diligence.**

- a) Integrate human rights due diligence in all its activities and business relationships, in all countries where it operates.
- b) Identify and assess potential negative impacts that the operations and activities carried out by TR Group companies may have on human rights, directly or through a third party, in particular situations and activities with the highest risk of violating human rights. Integrate the conclusions of impact assessments into internal processes.
- c) Define and implement mechanisms to prevent and mitigate such risk, as well as to redress impacts should they materialise. Remedy any negative human rights impacts generated by its activity.
- d) Continuously monitor identified risks and impacts, as well as compliance with mitigation and remediation mechanisms and actions.
- e) Promote a culture of respect for human rights by raising awareness of human rights among professionals in all the Group companies.

- f) Have in place reporting and grievance mechanisms, so that potentially affected persons and rights holders may have access to Tubos Reunidos and report any situation with a potential impact on human rights, equipped with sufficient guarantees and appropriate settlement procedures, and duly address potential cases of human rights violations.
- g) Take appropriate measures as soon as possible in the event of detecting a violation of human rights in the business conducted by the Group companies or those of its suppliers and inform the competent public authorities so that they may take appropriate action where such violation may amount to a serious administrative or criminal offence.
- h) Communicate all due diligence progress externally and always act in full transparency with stakeholders.

Likewise, the commitment to due diligence that the Tubos Reunidos Group expressly assumes in terms of respect for human rights implies not participating in actions that compromise the universal human rights recognised in domestic and international legislation and demanding strict respect for human rights from all its professionals and collaborators.

### **3.2. Respect human rights in relations with stakeholders.**

- a) Respect the human rights of all the people who work at Tubos Reunidos; in particular, protect the health and safety of its professionals, making safety a non-negotiable value and acquiring a commitment to zero accidents and damage to people's health.
- b) Respect freedom of affiliation and association of its workers and the right to collective bargaining.
- c) Prevent and combat discrimination on grounds of gender, age, race, disability or any other circumstance or condition susceptible to discrimination, promoting equal opportunities and respect for diversity.
- d) Pay particular attention to ensuring equality between men and women in access to work, working conditions and wages.
- e) Prevent and combat harassment at work on any grounds, as well as violence and sexual harassment.
- f) Reject forced labour in all its forms and any form of modern slavery, manifestation of abuse of authority, as well as the use of child labour, by ensuring and encouraging the elimination of such situations within its supply chain.
- g) Respect the right to freedom of movement within each country.
- h) Respect the rights of local communities with special attention to the most vulnerable groups, such as ethnic minorities, by promoting initiatives and ongoing dialogue.
- i) Reject corruption in all its forms by committing to the highest ethical standards and compliance with the law and applying the principle of zero tolerance for malpractice.
- j) Ensure the confidentiality and right to privacy of all persons with whom it interacts and make proper use of all personal data in its possession.
- k) Respect the right to a clean, healthy, and sustainable environment for all communities in which it operates.
- l) Establish strong relationships with communities and stakeholders in the areas of influence of activities and assets, based on the principles of mutual respect, trust, recognition, cultural sensitivity, integrity, accountability, transparency, good faith, and non-discrimination, through proactive dialogue and responsible and transparent management of impacts and opportunities.
- m) Respect land ownership and use and the right to natural resources, including water, according to international standards.
- n) Respect and not hinder the peaceful leadership of human rights defenders. Show no tolerance or contribution to threats or attacks and, when the situation requires it, create safe environments for dialogue.
- o) Respect the human rights of suppliers and customers. Reject any type of discrimination against suppliers, customers and users of products or services.

### **3.3. Extend these human rights commitments.**

Tubos Reunidos expects its partners, suppliers, contractors, agents, distributors, and other business relations to share responsibility with Tubos Reunidos and strictly respect these commitments and human rights in the conduct of their activities in any part of the world and, consequently, it expects them to address any negative impacts in which they have any involvement. To this end, it undertakes to:

- Raise awareness of and compliance with the commitments in this policy.
- Work with its partners and suppliers in any activity to advance compliance with human rights due diligence and remedy adverse impacts related to its operations, products, or services.
- In the case of suppliers with significant risk, require objective evidence of the integration of human rights due diligence in their activities. Likewise, Tubos Reunidos will expect these suppliers to work with their supply chains to respect human rights.

In particular, supply chain participants shall: (i) take the necessary measures to eliminate any form or form of forced or compulsory labour and any form of modern slavery in their organisation, as well as promote its adoption in their supply chain; (ii) expressly reject the use of child labour in their organisation as well as in their supply chain; (iii) respect the freedom of association and the right to collective bargaining of its professionals, avoiding any discriminatory practice based on any condition or characteristic in terms of employment and occupation; and (iv) set the wages of its professionals in accordance with applicable laws, respecting minimum wages, overtime and social benefits.

## **4. Development, monitoring and control**

TR Group's Independent Monitoring Body (IMB) in matters of compliance is responsible for the development and periodic review of this Policy, overseeing its implementation and submitting to the Board of Directors any observations or proposals for modification and improvement that it deems appropriate.

## **5. Adoption, publication, and entry into force.**

This Policy represents the public commitment of Grupo Tubos Reunidos to human rights and was approved by the Board of Directors of TRSA at its meeting held on 25 July 2024.

The Policy is published on TR Group's corporate website and intranet. It will also be sent to TR Group staff and communicated, insofar as applicable, to third parties with whom the TR Group interacts.

This Policy will be reviewed, updated, approved, and disseminated periodically, and whenever changes are required.

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