
CORPORATE ENVIRONMENTAL POLICY

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 of 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 Tubos Reunidos, S.A. (hereinafter, “**TRSA**”) is responsible for designing, assessing and permanently 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 set of internal regulations, and contain 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 and protection of the environment represent a fundamental part of the culture and responsibility in matters of sustainability of the Tubos Reunidos Group, and are fully integrated in all areas of the company’s activities. All Tubos Reunidos Group companies are firmly committed to caring for and respecting the environment. Likewise, this Environmental Policy extends to all Tubos Reunidos stakeholders, with the aim of sharing and promoting this commitment in its relations with them.

Tubos Reunidos makes a major and active contribution to the preservation of the environment and the fight against climate change. Its business strategy promotes sustainable and environmentally friendly solutions, working on the optimization of its processes, implementing circularity starting from the use of the raw material of the steel tubes it produces, to the circularity of the waste generated, the minimization of the consumption of natural resources, energy efficiency, sustainable water management and care for the environment.

TR Group assesses and mitigates all its environmental impacts through a robust environmental management system, integrated in all areas of the business, implemented to ensure the control of the environmental vectors mentioned above.

Respect for the environment is reinforced by placing increasingly sustainable solutions on the market that help our customers support us in our environmental commitment.

This Policy forms part of the Tubos Reunidos Group Corporate Governance System and is aligned with the Corporate Policy on Governance, Social and Environmental Matters, and with the Code of Ethical Conduct, as well as with the principles of the United Nations Global Compact, the Sustainable Development Goals and the OECD Guidelines for Multinational Enterprises.

1. Purpose of the Corporate Environmental Policy

The Board of Directors of TRSA promotes and approves this Policy, which has been drawn up taking into account the most demanding international standards, aware that respect for the environment is a fundamental part of the purpose and values of the TR Group companies, and an aspect inextricably linked to the 2030 Agenda for Sustainable Development of the United Nations (UN).

The goal of Tubos Reunidos is to minimize, in all its activities and relations with stakeholders, the environmental impacts generated by its activities and to comply with all applicable regulatory requirements, as well as with other requirements or commitments acquired by the Group.

In order to achieve this goal, Tubos Reunidos establishes a series of basic principles of action that are contained in this Policy. The term “respect” implies that it undertakes to make reasonable efforts to: i) identify any risk to the environment, ii) prevent and avoid its activities causing negative impacts on the environment and people and iii) if they occur, do everything possible to mitigate them or repair the damage caused.

This Policy also aims to reach out to all members of the value chain so that they jointly commit to observe and supplement the Group's integrated policy for management systems, to reinforce the message of alignment in the establishment of strategies, goals and targets for continuous improvement.

The purpose of this Policy is therefore to formalize the commitment of the Tubos Reunidos Group companies to respect and care for the environment, as well as to adhere to the principles underpinning the United Nations Global Compact, the Sustainable Development Goals (SDGs) approved by the United Nations (UN), the Company's Code of Ethical Conduct, as well as the documents and texts that may replace or supplement the aforementioned.

2. Scope of application

This Policy applies to all companies that make up the TR Group, as well as to all Board members, 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 Staff shall show strict respect for the environment in the conduct of their business in all countries in which they operate and make reasonable efforts to achieve compliance with this Policy throughout the value chain.

The Staff are expected to act as a first line of defense with regard to care and respect for the environment, informing about any potential impact or any breach of this policy, through the **Ethics Channel** provided in the Internal Reporting and Whistleblower Protection System.

Lastly, this policy will be communicated to all stakeholders working with the Group and to the entire value chain, in order to encourage them to join the TR Group in its firm commitment to respect the environment.

3. Main principles of conduct

To achieve the aforementioned goals and commitments, TR Group assumes and promotes the following main principles, which must govern the actions of all companies in its group and of the Staff in all areas:

Compliance:

- Comply with regulatory and other applicable requirements in environmental matters, planning accordingly.

Leadership and culture:

- Strengthen the leadership and visible commitment of Senior Management to environmental protection and to the environmental management system already integrated in the organization, involving the entire organization in the commitment acquired.
- Promote an environmental culture by Senior Management to enhance risk perception, transparency and reliance on reporting, continuous learning and innovation.

Continued improvement

- Systematically define environmental goals and monitor performance as an integral part of business management.
- Develop a global environmental system for the entire Group based on international standards, determining minimum levels and ensuring harmonization of the criteria applied in all Group companies.
- Pursue the sustainable use of resources, and the efficiency and optimization of energy use in the production, storage, transportation, distribution and marketing of its products.
- Make its best efforts to use clean, more efficient technologies with low operating and maintenance costs, promoting renewable energy sources that contribute to the decarbonization of the economy.
- Provide adequate training, information and motivation programs that allow workers to be aware of the environmental risks and impacts derived from their work, their importance and how to prevent them.
- Exchange best practices in the application of global standards, improving them progressively, becoming more demanding and efficient.
- Promote and reinforce the Environmental Management Systems of the plants to help:
 - Identify environmental impacts of the business.
 - Identify associated environmental aspects, designing actions and plans to mitigate their effect.
 - Draw up environmental emergency protocols.
 - Generate synergies with other systems to optimize processes.
 - Supplement the information about the Group's sustainability.
- Progressively reduce the environmental impact of all its activities, which includes:
 - Promote the responsible, rational and sustainable use of energy and water, managing the risks related to their scarcity and ensuring that the water used is returned to the environment in the desired conditions.
 - Preserve and protect biodiversity, generating, whenever possible, a net positive impact in relation to the environment and promoting respect for the natural environment.
 - Improve the circularity of the Group's activity and that of its suppliers, through the sustainable use of natural resources, the implementation of life cycle analysis, the minimization of industrial waste, its recovery and reuse in other processes whenever permitted by current regulations, as well as the use of recycled materials.

- Demonstrate the Group's commitment to respect for the environment in the execution of the projects in which it participates.
- Make its best efforts to use the best available mechanisms and technologies in all its processes and activities.

Communication

- Encourage the participation, involvement and sense of responsibility of workers towards a culture of sustainable development based on respect for and compliance with environmental procedures and on the initiative and contribution to their improvement.
- Maintain communication channels with stakeholders, providing our knowledge and reporting in a reliable and transparent manner with regard to performance and the effect that our activities and products have on the environment.
- Raise awareness, train and inform, and collaborate with all stakeholders with regard to the commitment to the environment.
- Disseminate this policy to the entire value chain.

4. Development, monitoring and control

The Board of Directors is responsible for adopting, reviewing and, if appropriate, updating this Policy.

The Audit Committee, a collegiate and internal body of the Board of Directors, of a permanent and specialized, informative and consultative nature, without executive functions, with powers of surveillance, information, advice and proposal within its scope of action, and with supervisory functions in relation to Sustainability, is responsible for reviewing this Policy if necessary, supervising its application 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 Tubos Reunidos Group to the protection of the environment, and has been approved by the Board of Directors of TRSA at its meeting of 19 December 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 has dealings.

This Policy will be reviewed, updated, approved and disseminated on a regular basis, and whenever any changes are required to be made.
