
CORPORATE POLICY ON THE WHISTLEBLOWING SYSTEM AND THE PROTECTION OF THE WHISTLEBLOWER

0. Introduction

The 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 whose parent company is Tubos Reunidos, S.A. (hereinafter, “**TRSA**”). 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, evaluating 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, made up, among other rules, of the By-Laws and the Regulations of the General Shareholders' Meeting, of the Board of Directors, and of such Board Committees as may be created, and contain the guidelines governing the actions of the Group, 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.

1. Purpose of the Corporate Policy on the Whistleblowing System and the Protection of the Whistleblower

The Board of Directors of TRSA has assumed a firm ethical commitment, which goes beyond strict compliance with the Law, and has established and implemented a Tubos Reunidos Group Compliance System, which consists of a set of rules, procedures and good practices adopted to identify, classify, control and prevent the risks of unethical and/or unlawful conduct, and to react against such conduct.

Tubos Reunidos recognises that a key element of its Compliance System is to have an Internal Reporting and Whistleblower Protection System that satisfies the requirements of Act 2/2023 regulating the Protection of persons who report regulatory infringements and the fight against corruption, and through this Policy, which forms part of the Tubos Reunidos Group's Compliance System, the Board of Directors determines the essential elements of this Reporting System and the principles of action that govern it.

This Policy therefore demonstrates Tubos Reunidos Group's commitment to ethics and regulatory compliance, fostering a culture of active communication with our stakeholders, both internal and external, and guaranteeing the protection of whistleblowers against possible retaliation.

For the above reasons, the TR Group has a Whistleblowing System in place (hereinafter, the “**Whistleblowing System**” or the “**System**”), which is part of the Compliance System, and which has been set up for reporting ethical breaches and/or breaches of the Law, one of the guiding principles of its operation being the protection of the person who reports in good faith any serious or very serious administrative or criminal breaches.

The Whistleblowing System is reserved for consulting and/or reporting ethical breaches (understood as breaches of the Code of Ethical Conduct) and/or legal breaches (understood as breaches of administrative and/or criminal laws) and is not set up as a means for communicating any conflict within the organisation.

Breaches of labour law in matters of health and safety at work and breaches involving financial loss caused to the Treasury or Social Security are always considered to constitute a serious or very serious criminal or administrative infringement and must therefore be reported and handled through the Whistleblowing System.

2. Scope of application

This Policy applies to 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”).

In addition, the scope of application includes any person, natural or legal, who has had, has or may have a professional relationship, or in the framework of a professional context, with the TR Group, and its shareholders (hereinafter, the “Third Parties”).

3. Definition of the Whistleblowing System and Protection of the Whistleblower

The Whistleblowing System is a set of rules, bodies and procedures established by the Board of Directors of Tubos Reunidos S.A. and comprises three fundamental pillars:

- ✓ A whistleblower channel for receiving information (the “**Whistleblowing Channel**”).
- ✓ A **System Manager**, and
- ✓ An Operating Procedure for the Information System (the “**Regulation on the Whistleblowing Channel**”).

4. Principles and guarantees of the Whistleblowing System.

The basic principles of action on which the System is based are detailed below:

- **Regulatory compliance:** Corporate ethics and respect for the rule of law are integral pillars of the System. Therefore, communications will be handled in an honest and professional manner, and in compliance with current legislation, applicable internal regulations and, in particular, data protection regulations.
- **Independence and impartiality:** The System shall ensure a fair hearing and fair treatment of all persons concerned. All persons involved in the proceedings shall act in good faith in the search for truth and clarification of the facts.
- **Transparency and accessibility:** It shall be ensured that information about the System and its regulation is transmitted in a clear and comprehensible manner, as that the System is duly advertised and accessible.
- **Traceability and security:** The System shall integrate all measures necessary to ensure the integrity, traceability and security of the information communicated.

- **Confidentiality and anonymity:** The System shall guarantee the anonymity and in any case the maximum confidentiality of the identity of the whistleblower, of the information reported and of the actions carried out in the handling and processing of the same. Likewise, the System shall allow the submission of anonymous communications.
- **Secrecy:** The System shall promote that the persons involved in the processing and investigation of communications act with the utmost discretion on the facts known to them by reason of their position or role.
- **Diligence and speed:** The System shall ensure that the investigation and resolution of the reported facts are handled with due professionalism, diligence and without undue delay, respecting due process.
- **Good faith:** The System shall ensure that the information reported is honest, complete and truthful, notwithstanding any inaccuracies or omissions that may be inadvertently made by the whistleblower.
- **Respect and protection of persons:** The System shall ensure that appropriate measures are taken to guarantee the right to protection of the dignity and privacy of the persons concerned.
- **Respect for fundamental rights:** The System guarantees the right to information, the right to defence, the right to contradict, the right to the presumption of innocence and the right to honour of all persons involved in the procedure. Likewise, these persons have the right to be heard in the manner and at the time deemed appropriate to ensure the proper conduct of the investigation.

5. Whistleblowing Channel

The Whistleblowing Channel is a communication system available on the TR Group website for receiving information, which allows anonymous communications, through which any query and/or breach of the Code of Ethical Conduct or the Law must be communicated to the System Manager. This consists of:

- An **e-mail address** which is available on the Group's website,
- A **Whistleblowing Hotline:** A telephone number through which any complaint or query can be communicated via a call, audio or message. The whistleblower will be warned that the communication will be recorded. The telephone number is available on the Group's website; and
- The possibility of a **face-to-face meeting:** The possibility of reporting any infringement verbally is also offered by means of a request by the whistleblower for a face-to-face meeting with the Whistleblowing System Manager. The whistleblower will be advised that the communication will be recorded or transcribed accurately and completely, subject to his/her consent.

The Whistleblowing Channel is set up as the **sole channel for receiving information on breaches of the Code of Ethical Conduct and/or the Law**, and integrates all internal reporting channels that may be established within the Company. All reports of workplace, sexual and/or gender-based harassment shall be received through the Ethics Channel and processed in accordance with the Regulation on the Whistleblowing Channel and the applicable Harassment Protocol.

Likewise, in the event that any of the information referred to in paragraph 1. of this Policy is communicated by means other than those provided for above, care will be taken to ensure that it is handled in accordance with the provisions of this Policy.

6. Whistleblowing System Manager

The Board of Directors of the TR Group shall appoint the Whistleblowing System Manager. This person shall be a Company Officer. In any case, the System Manager shall perform his/her duties independently and autonomously from the rest of the company's bodies, and may not receive instructions of any kind in the performance of his/her duties. Likewise, the System Manager shall perform his or her duties in accordance with the regulations and must avoid possible situations of conflict of interest.

Any member of Staff, individually or collectively, has the duty to collaborate with the Whistleblowing System Manager in accordance with the terms of this Policy, the Regulation on the Whistleblowing Channel, and other implementing rules.

7. Whistleblowing Operating Procedure: Regulation on the Whistleblowing Channel

The Whistleblowing System also has an Operating Procedure for the Whistleblowing System, consisting of the **Regulation on the Whistleblowing Channel**, which establishes how the communications received are to be managed, and which will be available on the corporate website and comply with the requirements of Act 2/2023 regulating the protection of whistleblowers. This procedure must establish that whistleblowers must be informed of the existence, in addition to the internal channel, of the external channels available to them for the purposes of reporting to the competent authorities, warning that they are not mutually exclusive. Likewise, the Regulation on the Whistleblowing Channel ensures due protection for whistleblowers and prohibits possible retaliation.

8. Development, monitoring and control

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

9. Adoption, publication and entry into force.

At its meeting held on 25 May 2023, the Board of Directors of Tubos Reunidos, S.A. approved this Corporate Policy on the Whistleblowing System and the Protection of the Whistleblower, with the aim of making progress in the adoption of the best Compliance practices, thus fulfilling its function of establishing the necessary bases for the appropriate and efficient management of the Whistleblowing System and promoting compliance with the principles and guarantees contained in this Policy.

This Policy will be published on the TR Group's corporate website and intranet. It will also be sent to the TR Group Staff and communicated, insofar as applicable, to the Third Parties with which the TR Group interacts. It will be reviewed, updated, approved and disseminated periodically and whenever it is necessary to make any changes.
