






CODE OF ETHICS AND CONDUCT

INTRODUCTION

Tubacero's philosophy encompasses a set of principles, values and generic guidelines for action, including, in addition, vision and mission of our business organization. The Code of Ethics in Business Conduct is a faithful reflection of those values and standards of personal and business behavior, constituting an essential piece of our organizational culture.

These Principles, Values and Code of Ethics and Conduct are applicable to Tubacero and its subsidiaries, and must be a guide in our daily actions, without distinction for all the people who are part of the organization, regardless of their level or position, their due observation and compliance is mandatory, notwithstanding the duty to always conduct ourselves with ethics and integrity, according to said Principles, even when some action is not contemplated within this Code.

 C.P. SANDRA I RAMIREZ GARZA HR MANAGER	 C.P. SANDRA I RAMIREZ GARZA HR MANAGER	 ING. NAPOLEON CANTU TREVIÑO CEO
Elaboró	Vo. Bo.	Aprobó

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PHILOSOPHY

Rooted in solid labor and ethical principles which lead us as a company, our philosophy allow to consider ourselves as a dynamic organization responsible for social and economic changes, creating progress and well-being. Likewise, through efficiency in its administrative and industrial processes and the encouragement given to the talent of its workers at all levels, we promote a healthy development and ongoing growth of our organization.

The fundamental principles of our industrial and business activity are:

1. To encourage mutual benefit, a permanent development of our workers, regardless of their area of location or hierarchy, under a framework of loyalty and social justice, fully respecting their freedom and dignity as human beings.
2. To manufacture socially useful products which, following standards of excellence in terms of quality, supply and service, prove our presence and participation in the market.
3. To provide a fair treatment and common support to our clients, suppliers and financial institutions, in the exchange of goods and services.
4. To create adequate profits for our shareholders in return on their investments, ensuring the existence and growth of the company.
5. To maintain ethical and friendly relations with business organizations and, in particular, with colleagues who also compete in the market.
6. To contribute with our hard work, products and contributions to the community development we serve, on a local, regional and national level.
7. To protect the environment, being responsible and committed to comply with all laws and regulations in this area, permanently seeking continuous improvement and sustainability of the business and the environment.

Mission

To produce goods and render services that meet standards of excellence, offering comprehensive solutions to the needs of extraction and transportation of fluids, solids and semi-solids, based on sustainability criteria and preservation of the environment. All within a framework of loyalty and social justice for its workers, fair treatment and mutual support to its customers, suppliers and financial institutions, which will enable a proper profitability to ensure the permanence and growth of the company, in accordance with current government regulations.

Vision

To be a leading, dynamic and visionary company, constantly transforming through the search for new solutions that anticipate and exceed the expectations of its customers, unconditionally respecting its business philosophy, its human capital and the environment, thus contributing to sustainability and social development.

Values

- **Responsibility**
To efficiently respond, in time and with quality, to the needs of our clients.
- **Readiness**

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The spirit of service is the motivation to do the job with satisfaction, when and where it should be done. Additional and extraordinary effort are inherent characteristics of our organization.

- **Creativity**
A free spirit and innovation are the basis of our improvement and the development of our company.
- **Work**
We conceive it as a means to dignify the human being and capable of generating prosperity for the individual, the organization and the community.
- **Integrity**
Consistency exists between our ethical principles and the way we act, always governed by loyalty and honesty.
- **Quality**
We always do things right at the first time.
- **Professionalism**
We believe in recognizing the skills, abilities, capacity, commitment and responsibility of each member of the organization and people we interact with.

We are aware that being a socially responsible company means complying with the Law, and for this reason at Tubacero we comply with all applicable Laws in all the countries in which we operate, applying always our Code of Ethics and Conduct.

COMMITMENT WITH OUR INTERNAL COMMUNITY

The main asset of our company is recognized in our collaborators, respecting their freedom and human dignity, within a framework of loyalty and social justice and continually promoting their development.

Health and Safety

We are committed to maintaining a safe and healthy work environment that contributes to the well-being of our employees, providing proper training and coaching, identifying risks to prevent accidents, as well as safeguarding company assets and transportation equipment of those suppliers and customers accessing our facilities.

Likewise, we are concerned about the health of our employees by implementing each year occupational health programs designed to maintain a health status, focusing mainly on the care of:

Visual health
Oral health
Vaccination
Family planning
Deworming
Somatometry

We have a Safety, Occupational Health and Environment Policy to reinforce our commitment.

The responsibility for complying with the Safety, Occupational Health and Environment Policy is shared by all of our stakeholders to safeguard their integrity and all others.

Likewise, we expect all our collaborators to be actively involved in our campaigns implemented within the company and also to share with us those areas of opportunity and/or detected deficiencies that could be addressed in a timely manner.

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Communication

Communication is the fundamental basis for any type of relationship intended to be established with stakeholders, especially with our collaborators who are key to the fulfilment of organizational objectives.

Therefore, at Tubacero we have different communication channels that allow us to keep all our collaborators informed about news, events, projects and important situations that happen inside and outside the company, mainly through our internal magazine, or other printed media, e-mail and official communications.

Communication contributes to building healthy and productive relationships that improve organizational performance, so all stakeholders, and especially our employees, are expected to communicate in a respectful, assertive and constructive manner.

All Directors, Managers, Coordinators, Chiefs and Supervisors have a stronger commitment in this matter, considering they are opinion and area leaders should be an example of a communication that improves the work environment and productive processes.

No discrimination

Tubacero promotes and stimulates a culture of diversity, inclusion and acceptance, reason why we do not tolerate any type of discrimination, such as: ethnic origin, skin color, culture, age, religion, sex, gender, sexual preference, disability, social condition, economic status, physical appearance, genetic characteristics, pregnancy, political identity or affiliation, marital status, family status, family responsibilities, language, legal immigration status, as well as those diseases that could give rise to social stigmas such as HIV/AIDS or mental disorders.

All decisions related to hiring, promotion, training, compensation, and termination of employment will be based exclusively on objective criteria such as performance, competencies, and business needs.

Likewise, the company is committed to preventing, addressing, and sanctioning any discriminatory conduct, ensuring confidential and secure mechanisms for reporting, as well as protection against retaliation for those who make such reports.

Sexual and Workplace Harassment

We at TUBACERO seek to have a healthy and balanced organizational environment that allows our collaborators to personally and professionally develop in an environment free of violence, meaning that we do not tolerate any act of bullying or sexual harassment.

Everyone who collaborates and/or works at Tubacero must respect human dignity and report any situation that threatens their physical or psychological integrity.

Any complaint received for this type of incidence will be taken as a priority and the pertinent investigations will be carried out based on our complaints process implemented by the Integrity Committee.

Training and development

We at Tubacero are aware that the achievement of our objectives and the success of the company depends to a large extent on the capabilities, potential and how well qualified our personnel are. For this reason, we have committed ourselves to developing and implementing training programmes with the purpose of providing workers the necessary knowledge and skills to carry out their current and future functions, keeping up with the challenges in different areas.

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Each year a Training Program is carried out based on the DNC where we strive to provide the training that will allow the employee to enhance their knowledge and development, so each employee has the responsibility to attend these trainings on time and get the best out of them.

Conflict of interest

Tubacero personnel must avoid situations that represent or could imply a conflict between personal interests and those of the company.

Tubacero expects any of its stakeholders at risk of being involved in a conflict of interest to immediately let us know so we can take appropriate action and resolve the situation.

In particular, all employees working at Tubacero are required to act with absolute loyalty and honesty, protecting the interests of the company, avoiding conflicts between personal interests and those of the company, or influencing or favouring interests unrelated to the productivity, efficiency and effectiveness of the business operation in negotiations and decision-making processes.

At Tubacero we seek to avoid situations that give rise to conflicts of interest in labour relations and/or may affect the healthy performance of our collaborators in their work, which means that it is not permitted for people to work in the same workplace of the company who are directly or indirectly supervised by a family member.

At Tubacero, with the objective of avoiding situations that may give rise to conflicts of interest and affect the proper performance of our employees, the company establishes that it is not permitted for individuals with a close family or personal relationship to work within the same workplace when there is a direct or indirect supervisory relationship between them.

Forced Labor and Child Labor

At Tubacero we reject forced labor as we consider it a serious violation of people's human rights. None of our collaborators is forced or threatened to provide their services in our company, any individual who identifies himself violating this right will be reported to the appropriate authorities.

Likewise, we reject child labor, therefore, we do not hire any minor as because we believe all children and young people should be focused on studies to ensure the social and economic development of their community.

In order to support our commitments with all collaborators mentioned herein, Tubacero has a Human Resources Policy (Capital/Human Talent) that is currently effective.

COMMITMENT WITH OUR CLIENTS AND SUPPLIERS

A selective process of our clients and suppliers of goods and services is established to make sure our business operations comply with the applicable international standards on money laundering.

We have a Quality Policy where we establish our commitment to provide a product and service with the highest standards. We also implement a customer service and satisfaction process that helps us identify our strengths and areas of opportunity for continuous improvement.

We treat all our customers and suppliers fairly and honestly, respecting our commitments and obligations, as well as the confidentiality of non-public information provided and intellectual property rights.

Likewise, the company has General Supply Policies, which establish the regulations and procedures to develop, monitor and apply in work-related purchasing process and dealing with our suppliers. We are committed to a relationship with suppliers of goods and services based on honesty and fairness, without discrimination and/or impositions, always seeking to protect the interests of the company in the assignment of contracts, but at the

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same time within the win-win criteria. Selection is impartial, based on criteria of quality, profitability and service, avoiding commercial operations of any kind with individuals, private companies or governments of countries in conflict, which violate these fundamental principles and / or are sanctioned by international authorities or the country.

ANTI-CORRUPTION COMMITMENT

Tubacero rejects and condemns all types of corruption, therefore, no bribes or favors are involved or tolerated to obtain or grant benefits of any kind, respecting the Anti-Bribery and Anti-Corruption Laws and Regulations of all the countries where Tubacero conducts business.

We only participate in authentic business with lawful purpose in accordance with all legal requirements, always conducting ourselves within an open to free competition framework, with fair treatment in business and honesty, responsibility and respect.

Tubacero expects all its stakeholders to adhere to our Code of Ethics and Conduct, acting with professionalism and honesty at all times.

Likewise, our collaborators will not be able to accept gifts or courtesies of any kind, except for promotional items of merely symbolic value.

COMMITMENT WITH THE COMMUNITY

To contribute with our hard work, products and contributions to the community development we serve, on a local, regional and national level.

We collaborate with civil society organizations, educational institutions and government to make social investments that contribute to improving people's quality of life and promote the social development of communities.

At Tubacero we seek to ensure that all the projects we support directly or indirectly meet one of the UN's sustainable development objectives, as we believe that focused cooperation leads to more far-reaching impacts.

We are aware of the impact that our operations generate in the environment, this is why we always seek to maintain an active participation in the community, taking into account their needs and interests before intervention or support.

ENVIRONMENTAL COMPLIANCE

One of Tubacero's main commitments is the conservation of natural resources and the prevention of pollution. Therefore, we have Policies and Procedures for the identification and evaluation of environmental aspects inherent to our processes, with the objective of mitigating adverse impacts on the environment.

We ensure that our activities, as well as those involved in them, such as suppliers, customers and contractors, comply with applicable legislation and other requirements assumed by us.

Likewise, we implemented an environmental education program for all our stakeholders, looking to raise awareness about our shared responsibility to preserve the environment.

Since this is a shared commitment, we expect all our stakeholders to be able to notify us when they identify an environmental risk or area of opportunity in our operations to address it in a timely manner.

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RELATIONSHIP WITH GOVERNMENT

The relationship with the government is primarily based on compliance with applicable legislation of our operations, and also when participating in public bidding to provide our products and services.

Tubacero participates in the bidding process in accordance with the law and fair competition, so when we are selected as suppliers, the only reason is the quality of our products and services.

Our anti-corruption commitment is present in this relationship, we base our action on principles of honesty and transparency, rejecting any dishonest conduct by either party.

CODE MANAGEMENT

This code of ethics and business conduct is governed by the Business Integrity Committee, formed by the highest officials of our organization.

The Business Integrity Committee is responsible for ensuring that all stakeholders are aware of this code, as well as for dealing with, investigating and resolving complaints regarding breaches of the code.

The Business Integrity Committee will handle and keep in strict confidentiality any complaint made and will maintain an objectivity for the resolution of cases.

Any individual intending to report a violation of this code may send a report via mail: denuncia@tubacero.com

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