

**TREFINASA's** Management, in accordance with its commitment to the development and continuous improvement of the Integrated Management System implemented based on the international standards ISO 9001, ISO 14000, and ISO 45001, which encompass the areas of QUALITY, HEALTH AND SAFETY, and ENVIRONMENT, and with the objective of ensuring that all individuals associated with the company act with integrity, complying with regulations and corporate values, has developed the following INTEGRATED MANAGEMENT POLICY:

1. **TREFINASA's** Management understands Integrated Policy as the continuous pursuit of customer satisfaction, knowing, understanding and satisfying their needs in terms of quality, price and time, preventing damage and deterioration to the health of all workers and working on continuous improvement with the standards of safety, quality, profitability, social responsibility as well as with the commitment to environmental protection and pollution prevention.
2. **TREFINASA** takes on the challenge of being a leader in its various product sectors, with the goal of generating permanent value for our customers, employees and society, all based on We have extensive knowledge and experience in applying best practices to maintain the quality, safety, and respect for the environment of our processes, these factors being key to the competitiveness and survival of our company.
3. **TREFINASA** is committed to identifying and complying with all legal and regulatory requirements applicable to customer requirements, its own activity, the products it handles and manufactures, the safety and health of people, as well as the protection of the environment, always applying the general principle of prevention.
4. **TREFINASA** has systematically established performance measurement, deploying a set of indicators and a process information system that enables the objective evaluation of the results obtained. Performance measurement includes indicators related to Quality, Environment, and Health and Safety, as well as the management of observed deviations with corrective and preventive intent.
5. **TREFINASA** promotes continuous improvement through systematic actions to reduce and/or eliminate aspects that are evolving negatively or that generate dissatisfaction among customers, suppliers, and/or staff, as well as "unwanted costs" or excessive resource consumption. Furthermore, it is committed to the continuous improvement of working conditions through health prevention and protection activities and by eliminating hazards and reducing risks to safety and health at work.
6. **TREFINASA's** management understands that success will depend decisively on the motivation, qualifications, and commitment of its staff and on teamwork, for which it guarantees and promotes consultation and participation of all workers.

7. **TREFINASA** company has developed a CODE OF ETHICS AND CONDUCT, which it disseminates to all employees and collaborators, also emphasizing the need for its compliance. This code covers issues related to:
- ✓ Integrity and transparency: Act with honesty, avoiding data falsification and illicit practices.
  - ✓ Conflicts of interest: Declare and avoid any situation that compromises independence and loyalty to the company.
  - ✓ Financial information. Transparency: Guarantee truthful and complete records; concealment or manipulation is prohibited.
  - ✓ Anti-corruption: Zero tolerance for bribery, extortion and corruption.
  - ✓ Confidentiality and data protection: Preserving the privacy and security of information.
  - ✓ Social responsibility: Promoting sustainability, transparency and good governance.
  - ✓ Labor rights: Prohibition of child and forced labour; equal opportunities; respect for freedom of association.
  - ✓ Working conditions: Compliance with regulations on wages, working hours and benefits.

**In Uharte-Arakil on 27/11/2025**

**The Managing Director  
Patxi Morentin**

