

## **Human Rights, Modern Slavery and Child Labour Statement.**

### **1. Who We Are. Organization structure.**

Tenaris S.A. (and its subsidiaries, together “Tenaris” or “Company”) is a leading global manufacturer and supplier of steel pipe products and related services for the world's energy industry and other industrial applications. Our customers include most of the world's leading oil and gas companies, and we operate an integrated network of steel pipe manufacturing, research, finishing and service facilities with industrial operations in the Americas, Europe, the Middle East, Asia and Africa.

Although our operations focus on serving the oil and gas industry, we also supply pipes and tubular components for non-energy applications. The develop and supply products and services for low-carbon energy applications such as geothermal wells, waste-to-energy (bioenergy) power plants, hydrogen storage and transportation, and carbon capture and storage.

Through an integrated global network of R&D, manufacturing and service facilities, and a team of 29,000 people worldwide, we work with our customers to meet their needs promptly, observing the highest standards of product performance and reliability.

The Company is a société anonyme organized under the laws of the Grand Duchy of Luxembourg established on December 17, 2001. The Company’s registered office is located at 26 Boulevard Royal, 4th Floor, L-2449, Luxembourg. Its agent for U.S. federal securities law purposes is Tenaris Global Services (U.S.A.) Corporation (“TEUS”), located at 2200 West Loop South, Suite 800, Houston, TX 77027.

Tenaris began with the formation of Siderca, the sole Argentine producer of seamless steel pipe products, by San Faustin’s predecessor in Argentina in 1948. The Company grew organically in Argentina and then, in the early 1990s, began to evolve beyond this initial base into a global business through a series of strategic investments.

Tenaris’s investments include controlling interests in several manufacturing companies, reflected in Exhibit A. For further information on Tenaris’s operations, you can access <https://ir.tenaris.com/financial-and-sustainability-reports/reports>.

Tenaris is a signatory of the United Nations Global Compact, a commitment to translate Ten Principles deriving from the Universal Declaration of Human Rights into daily business activity. Tenaris supports the United Nations Sustainable Development Goals and is a member of the Worldsteel Sustainable Development Charter. For the past six years, the Worldsteel Association has named Tenaris a Sustainability Champion for “*leading the way in creating a truly sustainable steel industry and society.*” Tenaris is committed to building a culture of transparency and integrity, based on ethical behavior and compliance with the law.

In this context, compliance with applicable human rights, forced and child labour and modern slavery regulations, including the UK Modern Slavery Act 2015, the Australian Modern Slavery Act, the German Supply Chain Due Diligence Act, the Dutch Child Labour Due Diligence Law, the Norwegian Transparency Act and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, is an important part of Tenaris’s sustainability program and evidences our everlasting commitment to essential human rights and freedoms.

The information contemplated in this Statement, reflects global standards on human rights’ protection and prevention of forced and child labour and modern slavery, developed and adopted by Tenaris S.A. and its subsidiaries, including without limitation, the companies listed in Exhibit A.

## **2. What We Do. The impact of our activities in the communities in which we operate.**

As a long-term industrial project, Tenaris's values are rooted in sustainable principles. Since we opened our first mill in Campana, Argentina in the 1950s, to the start-up of our state-of-the-art mill in Bay City, Texas, in 2017, and our more recent expansions, our prime objective has been to grow with the communities where we work and live.

To drive inclusive growth and development in the communities where we work and live, promoting a culture that rewards merit and encourages enterprise, as much academically as in terms of personal effort. Tenaris contributes to improving all levels of education in our immediate and broader communities, with a focus on technical education and help preserve our community's identity and heritage.

Tenaris's community program reflects over seven decades of industrial tradition worldwide. The principle guiding our work is that an industrial project like ours can only be sustainable if community and industry grow together. Our belief is that education is the main driver of individual and social progress. Our seven strategic programs are implemented locally to fit with the needs of each community where we operate.

Our global education programs are named after Roberto Rocca, one of our founders, who believed that education plays a vital role in people's development and that there must be synergy between industrial culture and technical education. In 2023, Tenaris invested USD 15.5 million in its Community Relations program, complemented by a donation of USD 1.3 million made by our controlling shareholder group. Of this amount, USD 14.4 million, 86%, was invested in our education programs. Education at all levels. Our educational programs span the entire schooling cycle, from elementary to higher level, helping children to fulfill their potential and become active contributors to society.

As described in Tenaris's Code of Conduct "*the sustainability of Tenaris's project worldwide has a deep connection with the growth and development of the local communities of the countries in which we conduct operations*" and commitment and compliance with human rights principles has been key to reach such sustainability.

## **3. Our Supply Chains**

Tenaris promotes a healthy and respectful workplace environment, with utmost respect for all laws governing human and labour rights, and supports the elimination of all forms of discrimination, illegal, forced or compulsory labour, slavery or servitude, in particular child labour. Tenaris's suppliers and contractors are expected to comply with these principles.

In 2023, Tenaris adopted a Sustainable Sourcing Policy to foster closer dialogue with suppliers and improve their awareness of sustainability concepts so that they can accompany us in meeting the standards required in our operations, providing support and training as needed.

Our vision is to help our supply chain become more competitive by adopting global quality, safety and environmental standards, acquiring the resilience to withstand market changes and sustain a solid value chain. We are currently in the process of implementing the Open-es platform, an open and collaborative ecosystem that seeks to involve all supply chain players in the energy transition. The platform offers sustainability analysis tools to help us work with key suppliers.

Most of our products are manufactured using an electric arc furnace (EAF) in integrated steelmaking operations from steel scrap, direct reduced iron (DRI), hot briquetted iron (HBI), pig iron and ferroalloys. In 2023, annual iron ore consumption, mostly from Brazil and Canada, amounted to approximately 850,000 tons.



Prices and availability of iron ore or other raw materials may be negatively affected by production interruptions, such as accidents or natural disasters. To mitigate risks and reduce dependency, we have been developing alternative suppliers. With our procurement company Exiros, we hold a selection process to ensure suppliers comply with the Company's Code of Conduct and local laws. The Sustainable Sourcing Policy is being integrated into this process as well as regular assessments of our suppliers' sustainability status. Business partners are required to meet internal standards governing ethical behavior, human and labour rights, legal compliance, and HSE responsibilities.

Tenaris purchases most of its supplies through Exiros, whose quality system is certified to ISO 9001 standards. In December 2023, Exiros had nearly 54,000 registered suppliers, of which over 16,000 were active during the year and 9,100 supplied goods or services to Tenaris.

#### **4. We Are Aware of Risks of Modern Slavery, Forced Labour and Child Labour Use in Global Supply Chains.**

Although Tenaris seeks to find business partners and suppliers with common understanding on Tenaris's core values and makes efforts to engage with reputable entities, given the breadth of Tenaris's operations worldwide and the variety of products and services we require, Tenaris cannot fully eliminate the potential for the violation of applicable laws or disregard for our established practices.

In a first attempt to tackle human rights infringements, forced and child labour and modern slavery, Tenaris has implemented due diligence measures (as described below) across third party suppliers, without distinction on their size or activity, due to the need of having minimum due diligence on human rights and modern slavery applied on a general basis. This general and expansive approach allowed the company to get general information on its supply chain and set minimum standards to suppliers in different tiers.

In upcoming years, the Company expects its forced labour risks to be targeted among suppliers from extractive industries. In this regard, when developing this targeted action plan, we will refer to our experience with conflict minerals regulatory regimes to map and define certain subject suppliers and conduct enhanced due diligence reviews, with a risk-based approach.

#### **5. How We Work to Ensure Our Supply Chains Are Free of Forced Labour and Child Labour**

##### **5.1. Our Policies**

Tenaris's Code of Conduct reflects the Company's strong commitment to the respect of human and labour rights as well as our support for the elimination of all forms of discrimination, illegal, forced or compulsory labour, slavery or servitude, in particular child labour. The latest version of the Code of Conduct was approved in 2023 and is effective as from March 2024, maintaining and reinforcing all these standards.

Tenaris's Human Rights Policy is a pledge to align company operations with human rights principles and reflects Tenaris's unwavering commitment to conducting its operations in a manner that is consistent with the Universal Declaration of Human Rights, the principles articulated in the International Labour Organization's Declaration of Fundamental Principles and Rights at Work and the United Nations Global Compact.

These principles include the respect for human freedom and dignity, the prohibition of child labour, forced labour and discriminatory behavior, and the recognition of the rights to freedom of association and collective bargaining.

The Company's Sustainable Sourcing Policy reflects the Company's commitment to develop a sustainable business and to work closely with suppliers to ensure a healthy, transparent, and robust

supply chain. Within such Policy, maintaining a work environment that is respectful of the fundamental rights and dignity of people, free of violence, harassment, abusive treatment, or exploitation has been enshrined as the basis for a sustainable development and set as a core expectation towards suppliers.

The Company has also in place a Policy on Business Conduct and a Code of Conduct for Suppliers, that contemplates a specific chapter on Labour and Human Rights, in which suppliers are required to act in compliance with the principles articulated in the International Labour Organization Declaration of Fundamental Principles and Rights at Work, reflecting in particular the prohibition against child labour, forced labour and discriminatory behavior as well as the recognition of the rights to freedom of association and collective bargaining. Acceptance and consistent compliance with the Code of Conduct for Suppliers is an integral part of Tenaris's management and evaluation procedure for Suppliers. In accordance with Tenaris's a risk-based approach, Suppliers might be eligible to provide specific or further integrity credentials and to comply with additional measures to verify compliance with the requirements of the Code of Conduct for Suppliers.

## **5.2. Our Due Diligence Processes**

Within the framework of our risk assessment of suppliers, commercial intermediaries, representatives and other third-party contractors, Tenaris has:

- i. adopted a due diligence review aimed at verifying that third-party contractors comply with essential human rights regulations and have not infringed any applicable laws in regards of slavery or forced or child labour;
- ii. included in our general terms and conditions for the purchase of goods and services, a commitment by third-party contractors to comply with applicable laws, rules and regulations on human rights, including a prohibition of all forms of slavery, forced labour or child labour; and
- iii. implemented a Code of Conduct for Suppliers based on United Nations recommendations, which contemplates a specific section concerning "Labour and Human Rights."

The Code of Conduct for Suppliers is applicable to Tenaris's suppliers and its acceptance (or where applicable, the acceptance of equivalent standards) is a condition to entering into any contractual agreement for the provision of goods or services with Tenaris.

In addition to current due diligence and assessment procedures, it is expected that during 2024 a growing number of suppliers of the Company will be required to expressly adhere to the standards, commitments and expectations reflected in Tenaris's Sustainable Sourcing Policy.

Tenaris also performs background checks (through specific screening tools) of suppliers prior to including them in Tenaris's Suppliers Masterfile (Tenaris's approved vendor list). Review of background information is part of usual onboarding process and is the opportunity, from time to time, shall request information related to such suppliers' sustainability practices and the analysis of such information, or the failure to provide it, would be considered in suppliers' qualification and selection processes.

## **5.3. Employee Training on Forced and Child Labour, Modern Slavery and Human Rights.**

Tenaris developed a comprehensive training course, which includes a thorough explanation of the scope of the most relevant laws and regulations impacting Tenaris's operations and provides a clear explanation of the risks that Tenaris may face when dealing with suppliers and third parties, as well as the importance of a healthy and sustainable supply chain.

The training sessions are adapted and targeted based on the selected audience and mainly focused on (i) raising awareness within the procurement areas on the key role of accurate due diligence and review of suppliers for purposes of ensuring a healthy and sustainable supply chain, (ii) educating on applicable standards, laws and regulations that have impact on Tenaris's operations; (iii) providing a perspective on the risks to which Tenaris may be exposed if policies and procedures are not complied with consistently and effectively; and (iv) underlining the strategic role that the Human Resources Department plays in compliance with applicable policies and procedures within Tenaris.

These training sessions were held in February 2022 and are expected to be resumed during 2024.

A recording of the sessions is available to all employees and will be included, as necessary, in the immersion process applicable to new employees joining Tenaris.

New e-learning courses on Modern Slavery and Human Rights were developed and are expected to be implemented in 2024. E-learning courses will be primarily available to reinforce training and awareness for buyers within procurement areas. We will keep working to improve our practices, strengthen current controls and procedures, and monitor our supply chain to ensure effective compliance and respect for the principles reflected in Tenaris's Human Rights Policy.

#### **5.4. How We Monitor Ourselves and Our Suppliers. Our Human Resources Annual Review and Certification.**

On a yearly basis, Tenaris's Human Resources Department conducts an internal survey process involving all regional Human Resources Senior Directors to assess specific human resources practices. Each Human Resources Director assessed Tenaris's compliance with key matters that are usually a concern from a human rights and modern slavery perspective, including, without limitation (i) minimum age required for employment, (ii) use of migrant workers; (iii) payment of recruitment fees, and (iv) the right to leave the job.

Through this assessment process, we concluded that no illegal or illegitimate practices were detected that would lead to an infringement of human rights, labour or modern slavery laws and regulations applicable to Tenaris.

Details of this internal review, the certification process and conclusions were shared with the Board of Directors as a condition to approve this Statement.

#### **5.5. How We Have Addressed or Remediated Reported Risks or Use of Forced Labour or Child Labour in our Supply Chains.**

Tenaris has to date not faced situations of forced labour or child labour and has therefore not yet been in a position to remedy and/or rectify such situations.

**We will keep working to improve our practices, strengthen current controls and procedures, and monitor our supply chain to ensure effective compliance and respect for the principles reflected in Tenaris's Human Rights Policy.**

**In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Tenaris. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.**

By: 

Name: Martin Castro

Title: Director



**Exhibit A – List of most relevant Tenaris [operative] companies.**

Consistent with the information reflected in Tenaris S.A.'s latest Annual Report, our investments include controlling interests in several manufacturing companies all of which are subject to the policies, procedures and standards of compliance reflected in this Statement:

1. Siat S.A.
2. Tubos de Acero de Mexico S.A de C.V.
3. Dalmine S.p.A.
4. Confab Industrial S.A.
5. Algoma Tubes Inc.\*
6. Tenaris Global Services UK Ltd.
7. Tenaris Global Services Norway.
8. Tenaris Global Services (Canada) Inc.\*
9. 2543500 Alberta Ltd. (Shawcor Canada)\*
10. S.C. Silcotub S.A.
11. Maverick Tube Corporation
12. Tenaris TuboCaribe Ltda.
13. Hydril Corporation
14. PT Seamless Pipe Indonesia Jaya
15. Tenaris Qingdao Steel Pipes Ltd.
16. Pipe Coaters Nigeria Ltd.
17. Tenaris Bay City Inc.
18. Saudi Steel Pipe Company
19. IPSCO
20. Tenaris Baogang Baotou Steel Pipes, Ltd.
21. Global Pipe Company

\*These entities have reporting obligations in Canada.