



SUSTAINABILITY
REPORT
2022





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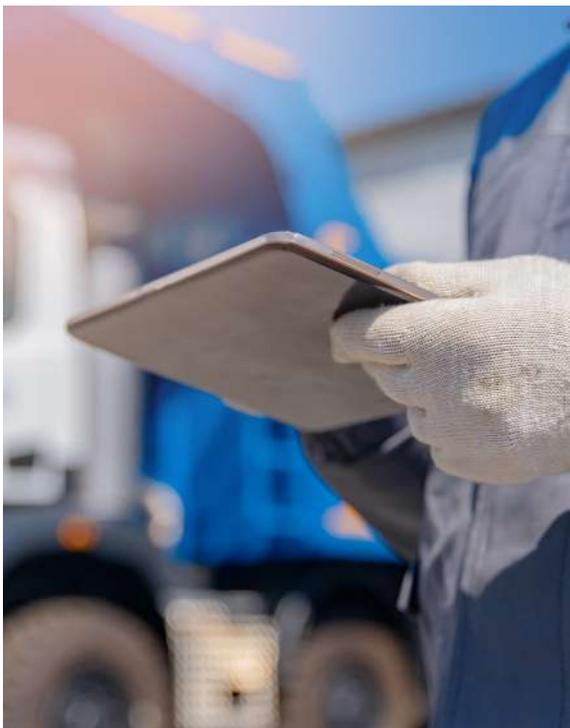


01

**ABOUT
THIS
REPORT**

1.1. INTRODUCTION

Since Tradebe prepared its first Non-Financial Information Statement in 2018, the company has demonstrated its commitment to transparency and its willingness to respond to the growing demand from its stakeholders - and from society in general - for companies to report detailed non-financial information focused on environmental, social and governance issues and the impact of the company's activities on them.



This report (hereinafter, the “**2022 Sustainability Report**”) corresponds to the period from 1 January to 31 December 2022. This report, which has been prepared annually since 2018, includes both individual and consolidated information on all the companies in the Tradebe Group (comprising Grupo Tradebe Medio Ambiente, S.L. and its subsidiaries, as indicated in Appendix I) in all significant aspects in accordance with the requirements of Law 11/2018 of 28 December on non-financial information and diversity. It is part of the consolidated annual accounts and is therefore subject to the same approval and publication criteria as the annual accounts.

It has been prepared in accordance with some GRI (*Global Reporting Initiative*) standards, the international reference framework for sustainability reporting. For those indicators that are not reflected in the aforementioned standard, our own reporting criteria have been followed.

In accordance with the current legal requirements, this 2022 Sustainability Report has been verified by RSM Spain Auditores, S.L.P.

Any questions about the report or its contents can be directed to the company via its website:

www.tradebe.com

1.2 MATERIALITY AND STAKEHOLDER ANALYSIS

Tradebe identifies its **material aspects**¹ through the preparation of its own **Materiality Study**, carried out with the advice of specialised consultants.

Through this analysis, we have identified the most relevant environmental, social and governance aspects (hereinafter, “ESG”²) for the business that generate or may generate a direct or indirect impact on the organisation’s ability to create, preserve or add value, both for the company itself and for its stakeholders. The results of the analysis have provided key information to improve future ESG management, identify areas with greater risk exposure and ensure proper alignment with the concerns of our stakeholders and society in general.

The materiality analysis is an annual procedure that Tradebe carries out in compliance with the requirements of Law 11/2018 on non-financial information. Tradebe has developed the study with a double materiality vision, as proposed by the European Commission in the future Corporate Sustainability Reporting Directive (CSRD).



¹In the context of sustainability reporting, material aspects are those environmental, social and governance issues that are relevant to internal and external stakeholders.

²ESG stands for Environmental, Social and Governance.



This analysis aims to:

- i. identify the most important sustainability aspects for the different activities carried out by the company;
- ii. understand their importance for internal and external stakeholders;
- iii. prioritise the different aspects to be worked on; and
- iv. determine which of these aspects need optimal management.

Tradebe's materiality analysis has been divided into three phases:

1	Starting point and benchmarking	<ul style="list-style-type: none"> i. Review of the results of the materiality analysis carried out and comparison with the ESG issues studied - Benchmarking ii. Preliminary list of ESG factors to be incorporated into the materiality analysis based on Tradebe's business model iii. Definition and identification of external and internal stakeholders
2	Stakeholder consultation	<ul style="list-style-type: none"> iv. Prioritisation and grouping of ESG issues to be added in the study v. Stakeholder consultation on the relevance and impacts of the ESG issues identified
3	Construction of the matrix	<ul style="list-style-type: none"> vi. Data processing and analysis of results vii. Preparation of the materiality matrix

The parties consulted for the construction of the materiality matrix represent the most relevant stakeholders in the company's supply and value chain. They have been chosen based on their strategic knowledge of sustainability and their ability to identify significant impacts for the business and third parties.

Results

The analysis carried out in 2021, which remains applicable for 2022, prioritises the ESG issues identified according to the relevance and impact given to them by internal and external stakeholders. The 15 most material issues have therefore been ranked in order of priority. Each band - in grey - represents the importance of the factors within it, making it easier to visually identify their importance.

Materiality matrix:



 ENVIRONMENTAL ISSUES	 SOCIAL ISSUES	 FINANCIAL OR GOVERNANCE ISSUES
<ul style="list-style-type: none"> 1 Environmental risk management 2 Promotion of the circular economy and efficiency in waste management 3 Promotion of energy efficiency 4 Ability to adapt and mitigate climate damage 5 Respect for biodiversity and conservation of natural capital 	<ul style="list-style-type: none"> 6 Promotion of health and safety at work 7 Diversity and equality of opportunities 8 Attraction, retention of talent and development of human capital 9 Respect for Human Rights 10 Promotion of work-life balance and work disengagement practices 	<ul style="list-style-type: none"> 11 Combatting money laundering, corruption and bribery 12 Relations with the local community 13 Regulatory compliance and responsible practices 14 Cybersecurity, innovation and digitalisation 15 Implementation of good governance practices

Tradebe's materiality analysis identifies six key sustainability issues:

- 1 Environmental risk management (ESG)**
- 2 Health and safety at work (ESG)**
- 3 Attraction, retention of talent and development of human capital (ESG)**
- 4 Promotion of the circular economy and efficiency in waste management (ESG)**
- 5 Regulatory compliance and responsible practices (ESG)**
- 6 Cybersecurity, innovation and digitalisation (ESG)**

These six factors have been recognised as the most relevant and impactful for the company and are those on which Tradebe will focus its sustainability efforts in the short and medium term.

These specific issues have been in focus in recent years to improve our ESG risk profile, but the results of this analysis confirm that they are the most relevant. These have been addressed by establishing specific lines of work in the sustainability committee, internal improvement and obtaining international certificates, improving teams to address specific issues such as cybersecurity, the use of software tools or the hiring of consultants.

However, in the future, we will continue to work on these critical material issues and monitor how the degree of importance of the others is changing in order to make further progress on concrete issues.

A hand is shown holding a puzzle piece against a blue background. There are other puzzle pieces scattered around, some of which are partially obscured by a large white question mark. The overall theme is organization and environment.

ORGANISATION AND ENVIRONMENT

2.1. ORGANISATIONAL PROFILE

Grupo Tradebe Medio Ambiente, S.L., domiciled at Calle Punta Sollana, 12, Ziórbena (Bizcaia), Spain, is the holding company of the group³ (hereinafter, “Tradebe”).

Tradebe is an internationally diversified group in sectors and businesses with a relevant industrial component and, at the same time, committed to sustainable development and the wellbeing of people and society in general. In 2022, the group’s consolidated and Annualised revenue⁴ amounted to €734 million.

Tradebe began operating in 1984 by providing environmental services to industry in Spain, the origin of the current Environmental Services division, which remains the group’s main business. At that time, its founder Mr. Josep Creixell identified the need to offer specialised environmental services to industry, where the complexity of the waste generated

(an environmental liability) was increasing, thus anticipating the subsequent and growing environmental awareness by both society and industry.

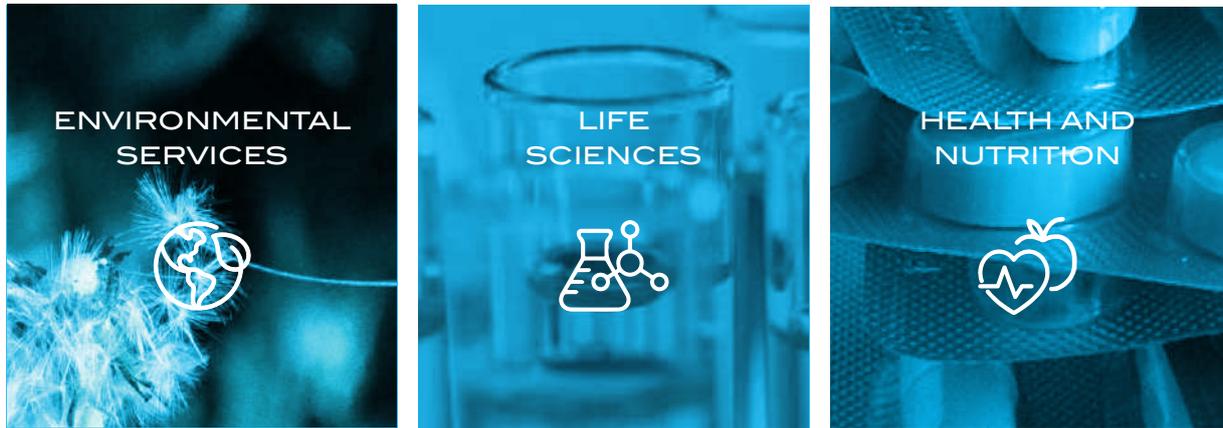
Since then, Tradebe has developed its strategy of sustainable growth through the internationalisation of the Environmental Services division (a leader in the provision of environmental services to industry), diversification into related industrial sectors (Tradebe *Purification*) and, more recently (in 2022), into other sectors (*Flavours & Fragrances and Health & Nutrition*).



³ See Annex I for a list of all the companies that make up the group, by country.

⁴ “Annualised” means that the revenue of those businesses or activities acquired during 2022 from 1 January 2022 to the date of acquisition (as if such businesses had been acquired on 1 January 2022) have been taken into account and are included

At present, and as a result of its diversification strategy, the group carries out its activities in three separate and independently managed business divisions with a permanent presence in Europe (Spain, United Kingdom, Germany, Italy and France) and North America (United States):



	INGRESOS ANUALIZADOS ME	INGRESOS ANUALIZADOS POR PAÍS Y DIVISIÓN					EMPLEADOS Nº	AÑO INICIO
		SP+FR	UK	USA	GER	ITA		
 ENVIRONMENTAL SERVICES % división	621 84%	226 36%	142 23%	252 41%	0 0%	1 0%	2.238 83%	1984
 LIFE SCIENCES % división	76 10%	26 34%	33 43%	-	8 11%	9 12%	244 9%	2003
Purification	65 9%	15	33	-	8	9	198 7%	2003
Flavours & Fragrances	11 1%	11	-	-	-	-	46 2%	2022
 HEALTH & NUTRITION % división	37 6%	37 100%	-	-	-	-	212 8%	2022
TOTAL	734	289	175	252	8	10	2.694	
% total	100%	40%	24%	34%	1%	1%	100%	

As we can see, the Environmental Services and Life Sciences divisions represent 94% of the group's Annualised revenue while the Health and Nutrition division, acquired during 2022, only represents 6% of the group's Annualised revenue this year. Accordingly, given the materiality and recent incorporation of the new divisions into the group, and for the purposes of this Sustainability Report, the information contained in the following sections will focus primarily on or refer exclusively to the Environmental Services and Life Sciences divisions, except where otherwise stated.

2.2. BUSINESS ENVIRONMENT

The activities and business environment of each of Tradebe's current business divisions are described in more detail below:



ENVIRONMENTAL SERVICES (ES)

The Environmental Services business represents 84% of Tradebe's aggregate and Annualised operating revenue in 2022 (93% in 2021).

Tradebe Environmental Services is a leading company used as a benchmark in the provision of environmental services to industry in Europe (Spain and the United Kingdom) and the United States.

These services consist of the **management, mitigation, remediation, collection, treatment, recovery, recycling and/or disposal of industrial waste**, mainly hazardous waste (Hazardous Industrial Waste) and, to a lesser extent, non-hazardous waste (Non-Hazardous Industrial Waste), as well as the marketing and **sale of by-products derived from the recycling of such waste**.

These are **non-discretionary, innovative and high-quality services to industry** and clearly contribute to sustainable development and the circular economy. The non-discretionary nature of its environmental services is due to the fact that Tradebe's activity is closely related to:

a) the existence of environmental legislation, policies and regulations;



b) the implementation and enforcement of and compliance with the legislative, policy and regulatory framework by industry (generators of industrial waste); and

c) the monitoring and control undertaken by the relevant environmental authorities and agencies to ensure compliance with such environmental legislation, policies and regulations (enforcement).

Tradebe’s Environmental Services business is aligned with the concepts of:

- **Circular Economy**

The concept of *Circular Economy*, diametrically opposed to the concept of the Linear Economy/Productive Model (extract, manufacture and dispose), is a production and consumption model that involves renewing, reusing and recycling existing materials and energy in order to extend their life cycle, therefore creating added value.

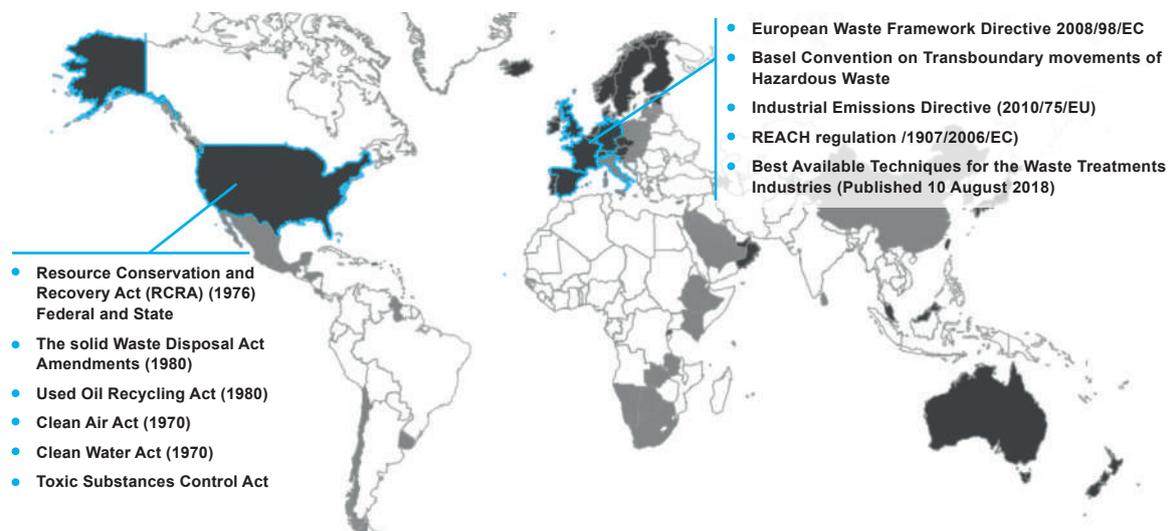
The concept is becoming increasingly relevant and sets the direction and level of demand for environmental and also social regulatory frameworks (Corporate Social Responsibility).

- **Waste Hierarchy**

The regulatory framework of the waste management sector is oriented towards the protection of the environment and human health.

For example, Article 4 of the EU Waste Framework Directive introduces the concept of the Waste Hierarchy, which establishes a basic order of preference when promoting responsible and sustainable waste management. This concept goes beyond the traditional approach of the three Rs (Reduce, Reuse, Recycle) and establishes a more elaborate five-level hierarchy that prioritises from the most favourable to the least favourable action from an environmental perspective (*Prevention, Preparation for Reuse, Recycling, Recovery and Disposal*).

Tradebe is present in countries where the level of environmental legislation and its application is more rigorous and demanding. The map below shows the top 35 countries where the level of stringency and enforcement of environmental regulation is highest and identifies those countries where Tradebe operates with licensed plants or facilities, thus showing the high correlation between the markets in which Tradebe operates and the level of stringency and enforcement of environmental legislation.



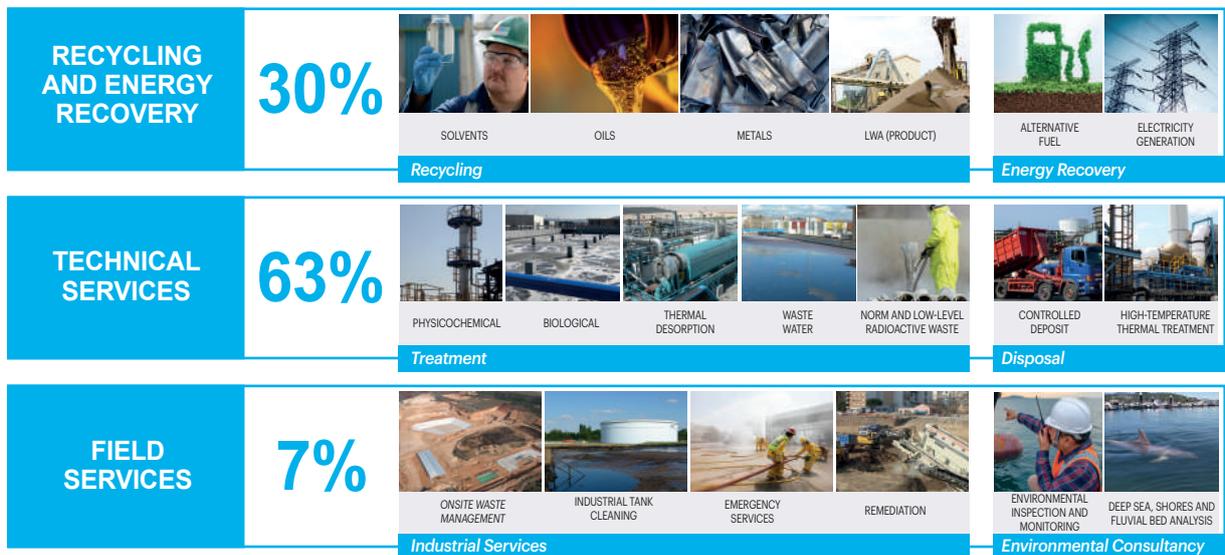
Source: World Economic Forum, Executive Opinion Survey

Stringency and Enforcement of Environmental Regulation
 ■ Top 35 ■ Top 70 □ All others (70+) ○ Tradebe footprint



Tradebe Environmental Services provides its services in a diversified way to different industries and sectors (sectoral diversification), with the main industrial sectors it serves being: *Materials and Chemicals* (pharmaceutical, chemical, petrochemical industries), *Energy (Oil & Gas)* (oil and gas industries, terminals, pipelines), *Industrial* (metallurgy, mining), *Utilities* (electrical industry), *Automotive* (automotive industry), *Healthcare and Government* (Healthcare system, Defence etc).

The environmental services provided by Tradebe are divided into the following lines of business: **Recycling and Energy Recovery, Technical Services and Field Services.**



• RECYCLING AND ENERGY RECOVERY

Recycling and energy recovery services represent 30% of the Environmental Services revenue in 2022 (32% in 2021).

Recycling

The recycling business consists of processing and cleaning the waste (contaminated product) in order to obtain Secondary Raw Materials and to give it the same original use.

The main raw materials or recycled products are petroleum products (fuels and oils), and iron and metals.

a) Hydrocarbon recycling (Fuel/Oil)

Since 1989, Tradebe has been recycling waste with a high hydrocarbon content from tanks, reservoirs, quarries, ponds and especially from ships (MARPOL, Annex I of the Convention). Its facilities obtain a high specification product which is certified for use as a clean fuel (enhanced fuel oil or *Tradebe Green Fuel*).

b) Ferrous and non-ferrous metal recycling (Metals)

Tradebe operates two facilities in Spain (Basque Country and Catalonia) for shredding ELVs (end-of-life vehicles) and motors. These facilities separate the ferrous and non-ferrous fractions (aluminium, copper, zinc, etc.) for their subsequent sale and marketing to the steel industry (i.e., steelworks) and metallurgy.

c) Light Weight Aggregate (LWA) production

Tradebe also produces LWA, an extremely light and very resistant porous ceramic material, which is used in the construction of infrastructure (motorways, airports) and buildings (skyscrapers, hotels, convention centres etc.).

The LWA (*Recycling - LWA (Cement Product)*) production plant is located in Cohoes, New York (NY), USA, next to a shale/slate quarry (*Mining*) and has two rotary kilns, the only ones of this type authorised for the high-temperature thermal treatment of hazardous industrial waste (*Technical Services - Disposal - High-temperature thermal treatment*).

Energy Recovery

Energy recovery consists of processing, preparing and conditioning the waste for a different use, normally to generate electricity or as alternative fuels, taking advantage of the calorific value of the waste (energy recovery or fuel blending). The main recipient of the energy recoverable flows is the cement industry, which is also interested in reducing the consumption of CO2 emission rights, through the use of fuels obtained from waste, with high calorific value (Refuse-Derived Fuel (RDF) or Alternative Fuels (AF)).

• TECHNICAL SERVICES

Technical services represent 63% of the Environmental Services revenue in 2022 (61% in 2021) and are divided into Treatment Services and Disposal Services.

Waste Treatment Services (Treatment)

Waste treatment services account for 85% of the Technical Services revenue in 2022 (84% in 2021) and are carried out at transfer stations and treatment plants.

a) Transfer Stations

The logistics of hazardous industrial waste outside the customer's facilities starts at the transfer stations. Transfer stations are logistics centres where the different types of waste are segregated and classified for their subsequent transport to recycling, energy recovery, treatment, or final disposal plants.

b) Treatment Plants

Hazardous waste is characterised as flammable (*ignitability*), corrosive (*corrosivity*), explosive (*reactivity*), toxic (*toxicity*) and/or contagious. Waste treatment services consist of treating hazardous waste to reduce or neutralise these characteristics, along with weight and volume, by means of physicochemical (solidification, neutralisation, stabilisation, decantation, centrifugation), thermal, biological, etc. treatments that require different technology, facilities and highly specialised knowledge and know-how.

In addition to the more standard treatment services, Tradebe provides specialised waste treatment services such as the treatment of low and intermediate level radioactive waste and the treatment and disposal of clinical waste in the UK.

Waste Disposal Services (Disposal)

The Final Disposal activity consists of the final disposal of the waste by means of controlled tanks and high-temperature thermal treatment (without an *Energy Recovery element*).

a) High-temperature thermal treatment

Tradebe operates one of only two licensed high-temperature thermal treatment plants for hazardous waste in the UK with an annual capacity of approximately 45,000 tonnes, as well as four smaller licensed high-temperature treatment plants for the disposal of hospital waste also in the UK.

b) Controlled deposits

Tradebe operates three controlled deposits of industrial waste in Spain (Catalonia, Madrid and Castilla la Mancha), one of which is the only controlled deposit of hazardous industrial waste authorised in Catalonia, and one controlled deposit of non-hazardous industrial waste in the United States (Baton Rouge, Louisiana).

- **FIELD SERVICES**

Field Services, which represent 7% of Environmental Services' revenue in 2022 (also 7% in 2021), consist of environmental services provided at the customer's premises (as opposed to *Recycling & Energy Recovery* and *Technical Services* which are mainly provided at Tradebe's permitted facilities).

Industrial Services

Industrial services are mainly prevention services, industrial cleaning, emergency response services, remediation and total waste management services.

Environmental and Marine Survey Consultancy and Laboratory

Tecnoambiente, S.L.U., based in Spain, is Tradebe's environmental consultancy business specialising in the marine environment as well as offshore and onshore projects. *Tecnoambiente* has experience in international projects in Europe, Africa, Asia and the Americas for geophysical and hydrographic surveys and seabed impact studies for clients in the oil and gas, renewable energy, subsea cables and ports sectors.

In addition, it has three of its own laboratories, with ISO 17025 accreditation.



LIFE SCIENCES

The Life Sciences business represents 10% of Tradebe's Annualised revenue in 2022 (7% in 2021).

The services provided by this division are divided into the following lines of business: **Tradebe Purification and Tradebe Flavours & Fragrances.**

- **TRADEBE PURIFICATION**

The Tradebe Purification line of business is a 'spin-off' of the solvent recycling business division in Environmental Services which responds to a diversification and strategic orientation towards the provision

of specialised distillation and purification services of high value-added chemicals. These are used, for example, as raw materials and intermediates for the production of Active Pharmaceutical Ingredients (APIs) in the pharmaceutical, agrochemical, food and petrochemical sectors, among others, and the distribution and sale of fine and specialty chemicals of certified or customer-approved quality.

Tradebe Purification is a European leader in solvent purification and has two distillation plants in the UK (Sunderland and Rye), one in Spain (Gualba), one in Germany (Schwarzheide), and one plant in Italy (Fidenza).

Tradebe Purification's business is also characterised by the fact that it operates in a highly environmentally regulated area in which some of the concepts related to the Environmental Services business, sustainability and the circular economy, also apply.



• **TRADEBE FLAVOURS & FRAGRANCES**

In April 2022, Tradebe finalised the acquisition of Cosmos Aromática Internacional, a manufacturer of flavours and fragrances for the food and beverage industry.

This acquisition is part of Tradebe's strategic plan to become a leading specialist in the production of raw materials for different types of industries and represents Tradebe's entry into the Flavours and Fragrances sector, which accounted for 1% of the group's Annualised revenue in 2022.

Some natural ingredients that are used for flavouring or adding fragrances to foods require purification by distillation. Tradebe Purification's experience in distillation activities and handling complex raw materials allows for the distillation and purification of other chemical compounds of a much higher added value with much higher requirements in terms of quality and control processes.

Flavours & Fragrances has a production plant in L'Ametlla del Vallès (Barcelona) with a team of 46 people.

Two out of the six Life Sciences plants are FSSC 22000-accredited, and four of the plants are Kosher and Halal certified. These accreditations are particularly important in the food world.



HEALTH AND NUTRITION

The Health and Nutrition business, incorporated in June 2022 through the acquisition of the Clinical Nutrition group, represents 6% of Tradebe's Annualised revenue in 2022.

This new acquisition is in line with the group's diversification strategy towards sectors with a positive impact on society and people and involved the creation of a new business division for the group, under the name of **Health and Nutrition**, dedicated to the production and marketing of nutritional products (enteral nutrition, sports nutrition, dietary nutrition (weight control) and food supplements, among others) aimed at improving people's quality of life.

Health and Nutrition has a production plant in Argentona (Spain) and a team of 212 people.



2.3

REPORTING IN RELATION TO THE EU TAXONOMY

In June 2020, **Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020** on establishing a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088, known as the “**EU Taxonomy**”, was published.

The EU Taxonomy aims to harmonise the criteria for determining whether an economic activity is considered environmentally sustainable across the EU, in order to eliminate the use of self-serving definitions of sustainability, corporate ‘greenwashing’ and obstacles in attracting funds for truly sustainable projects. By harmonising the criteria set out in the EU Taxonomy, the European Commission seeks to establish common definitions and criteria for sustainability based on independent, science-based indicators.

The **EU Taxonomy Regulation** states that for an economic activity to be classified as sustainable, it must comply with certain points:

1. To make a significant contribution to at least one of the six EU environmental objectives:
 - i. Climate change mitigation (defined activities and criteria).
 - ii. Adaptation to climate change (defined activities and criteria).
 - iii. Sustainable use of hybrid and marine resources⁵.
 - iv. Circular economy⁵.
 - v. Pollution prevention⁵.
 - vi. Ecosystems and biodiversity⁵.
2. To meet the technical selection criteria specific to the activity.
3. Not to cause significant detriment to any of the other environmental objectives.
4. To act in accordance with minimum social guarantees.

⁵ Economic activities and the sustainability criteria and safeguards to be met for the contribution to the climate objectives to be defined in the Taxonomy Regulation.

The EU Taxonomy Regulation ultimately aims to define the economic activities (eligibility) and the sustainability criteria and safeguards to be met for the contribution to each of the six (6) EU environmental objectives (alignment). The activities included in these lists are therefore referred to as eligible activities, while those that also meet the requirements are referred to as aligned activities.

Article 8 of the regulation (2020/852/EU) states that non-financial companies under the application of the Non-Financial Reporting Directive 2014/95/EU must publish how and to what extent their activities are associated with sustainable economic activities of the EU Taxonomy. The same Article 8 (2) specifies that three indicators must be published; the percentage of Revenue, the percentage of CapEx and the percentage of OpEx associated with sustainable economic activities. In 2022, the obligation to publish all three indicators was established for eligible activities, while in 2023, aligned activities must also be published.

As a first step and to date, the EU Taxonomy Regulation - by means of the Climate Delegated Act - has defined only those economic activities and the sustainability criteria and safeguards to be fulfilled for the contribution to the following two EU environmental objectives:

- i. Climate change mitigation
- ii. Adaptation to climate change

In this regard, it should be noted and highlighted that currently, only activities linked to non-hazardous waste have been defined in the EU Taxonomy and it therefore does not yet include or contemplate activities linked to hazardous waste, which correspond to Tradebe's main and core activity in terms of revenue, CapEx and OpEx.

Methodologically, and despite the limitation that the EU Taxonomy does not yet consider Tradebe's core business - more aligned with the other 4 EU environmental objectives and hazardous waste - Tradebe has carried out the following methodological process to extract the required indicators:





According to the EU Taxonomy Regulation, Tradebe's eligible activities identified in the 2022 financial year as having the potential to make a substantial contribution to climate change mitigation and adaptation are as follows, all within the Environmental Services division:

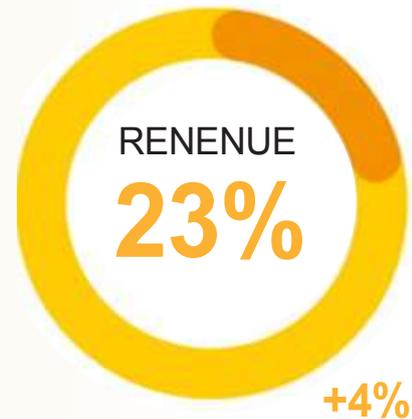
Tradebe's business activity	Activity incorporated into the EU Taxonomy
Recycling (ES)	5.9 Recovery of non-hazardous waste materials
Energy recovery (ES)	5.10 Landfill gas capture and utilisation
Waste treatment services (ES)	5.3 Construction, extension and operation of wastewater collection and treatment systems 5.5 Collection and transport of non-hazardous waste in source segregated fractions 5.8 Bio-waste composting
Environmental consultancy and marine surveys (ES)	8.2 Data-driven solutions to reduce greenhouse gas emissions 9.1 Technical engineering services and other activities related to technical advice on climate change adaptation 9.2/9.1 Near-market research, development and innovation

The financial information for the calculation of the financial indicators has been extracted from the group's accounting and management systems, making use of data at plant, service or process level where necessary.

Out of the activities carried out by Tradebe, it is considered that:

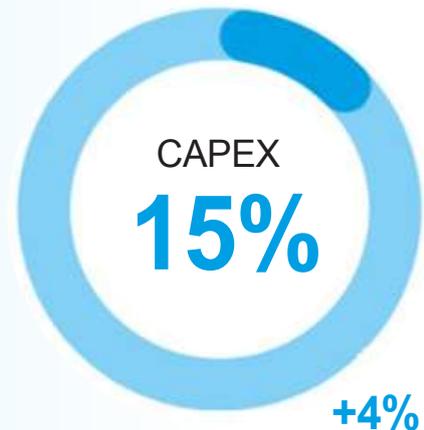
- **Revenue**

From a total of 708,188 thousand euros of consolidated revenue in 2022, 163,844 thousand euros is considered to have come from eligible economic activities based on those set out in the Climate Delegated Act. This corresponds to **23%** of the 2022 revenue and represents an increase of 4% compared with the 2021 revenue.



- **CapEx**

With regards to CapEx, as defined in Article 8 of the Climate Delegated Act, out of the 42,682 thousand euros invested in 2022, 6,265 thousand euros is considered to be eligible investments based on the EU Taxonomy. This corresponds to **15%** of the 2022 CapEx and represents an increase of 4% compared with the 2021 revenue.



- **OpEx**

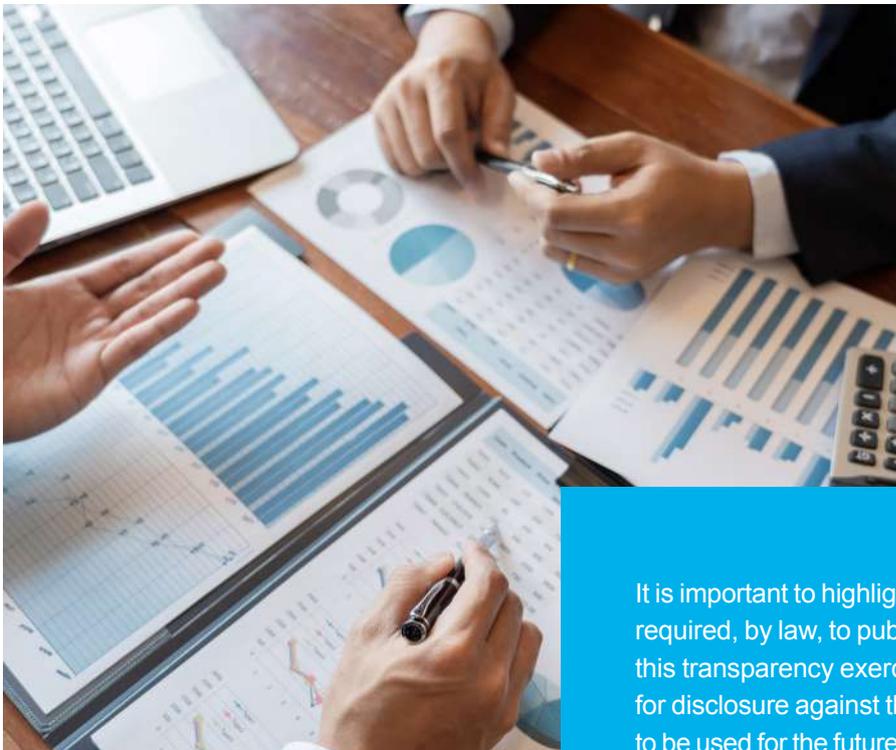
With regards to OpEx, as defined in Article 8 of the Climate Delegated Act, out of 666,714 thousand euros in 2022, 134,298 thousand euros is considered to be eligible OpEx based on the EU Taxonomy. This corresponds to **20%** of the 2022 OpEx and represents an increase of 3% compared with the 2021 revenue.



Despite the current limited scope of the EU Taxonomy Regulation focusing on only two (2) of the six (6) environmental objectives and, consequently, not yet including activities linked to hazardous waste (Tradebe's core activity), part of Tradebe's activities, as a company focused on environmental services, already show remarkable levels of eligibility (revenue (23%), CapEx (15%) and OpEx (20%)).

The most important difference between 2021 and 2022 is the increase in revenue and OpEx of operations linked to waste recovery, especially metals, and those related to wastewater treatment. It should also be noted that this second year has improved the level of analysis of the activities compared to the previous year, which has helped to improve the identification of eligible and ineligible activities, and has consequently increased the eligibility percentages in some cases.

In order to be able to accredit a higher level of eligibility and alignment with the EU Taxonomy in the medium and long term, work will be carried out to include activities linked to hazardous waste in the lists of the Climate and Environmental Delegated Acts. This, along with the future approval of activities linked to the circular economy environmental objective, is expected to considerably and significantly increase the results and reflect the true level of sustainability of Tradebe's business model, currently limited by the current scope defined in the EU Taxonomy Regulation.



It is important to highlight that Tradebe is not currently required, by law, to publish Taxonomy data, however, this transparency exercise aims to prepare the group for disclosure against the new ESRS⁶ and is intended to be used for the future implementation of the CSRD⁷.

⁶ ESRS stands for European Sustainability Reporting Standards.

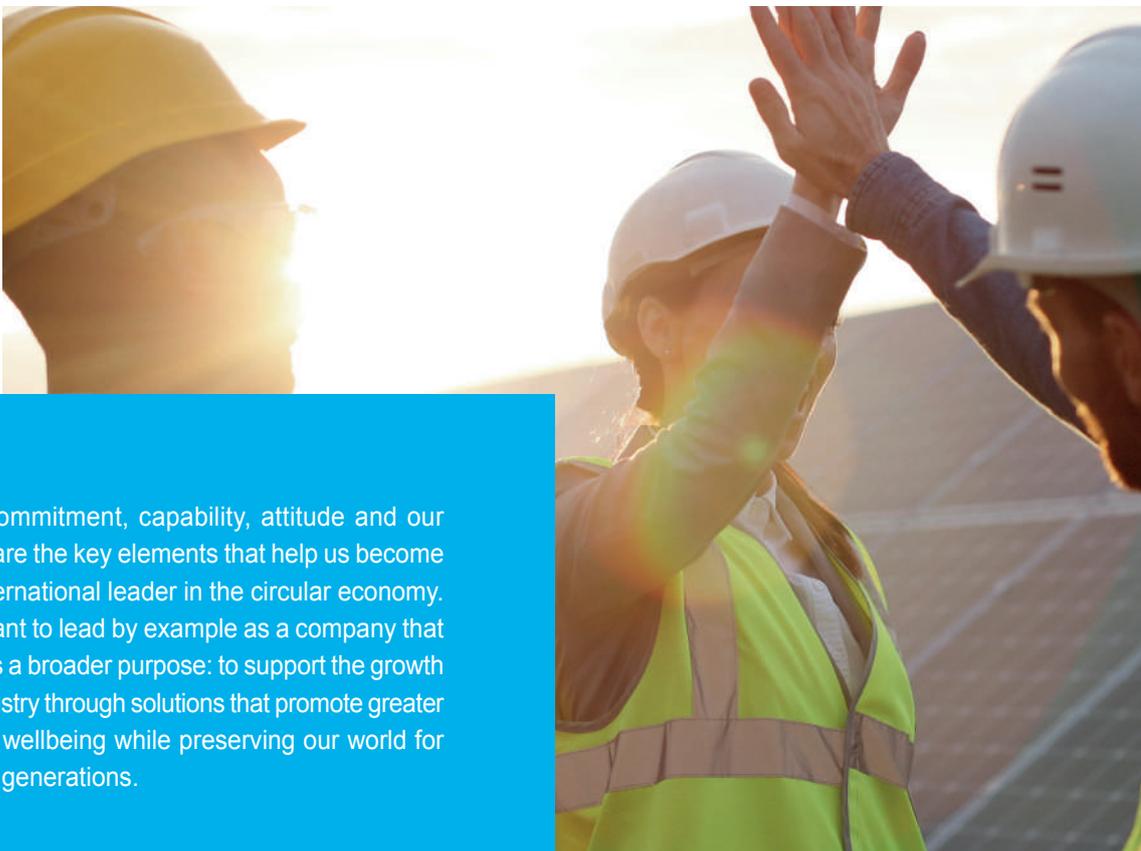
⁷ CSRD stands for Corporate Sustainability Reporting Directive.

2.4 PURPOSE AND VALUES

At Tradebe, we have the drive, capability and commitment to contribute to **sustainable industrial development**. We are firmly committed to minimising the impact of industrial processes to meet the needs of society.

We know that our contribution to industry and society is only possible **thanks to our employees**. This is the reason why we offer a world-class employee experience, attracting people with the right knowledge and attitude, while providing a safe and dynamic environment in which to grow.

From the beginning, our mission as an organisation has been to care for the environment and **promote sustainable growth in our** ever-changing **society**. As a company, we are dedicated to promoting the circular economy and committed to the environment and the communities where we live and work.



Our commitment, capability, attitude and our team are the key elements that help us become an international leader in the circular economy. We want to lead by example as a company that serves a broader purpose: to support the growth of industry through solutions that promote greater social wellbeing while preserving our world for future generations.

OUR COMMITMENTS

To carry out our purpose, among others, we have a sustainability policy, which includes our commitments in matters of Environmental, Social and Good Governance.

- *In Environmental Matters*

Environmental Sustainability is one of Tradebe's values. Our commitment is to work towards a Circular Economy, by reducing the resources (both natural and material) we use in our treatment processes, by reducing the waste we generate and by carrying out a digitalisation process in all areas of the organisation.



We are committed to fight climate change by reducing the carbon footprint of our work centres, through the decarbonisation of the energy consumed, energy efficiency studies and the necessary technological changes; particularly in the Environmental Services division and the Tradebe Purification business, extending the life cycles of our customers' resources (fuels, oils, solvents, iron, metals, etc.). All of this is done to ensure the protection of the environment and biodiversity.

We are committed to continuous improvement, beyond the legal requirements, in the environmental area in all our plants through the maintenance of ISO 14001 certifications in 37 of our plants.

- *In Social Matters*

The Health and Safety of our employees, the Development of their talent and their Growth are among Tradebe's values. We support the United Nations Universal Declaration of Human Rights and want to build a sustainable future for everyone in the communities in which we operate.

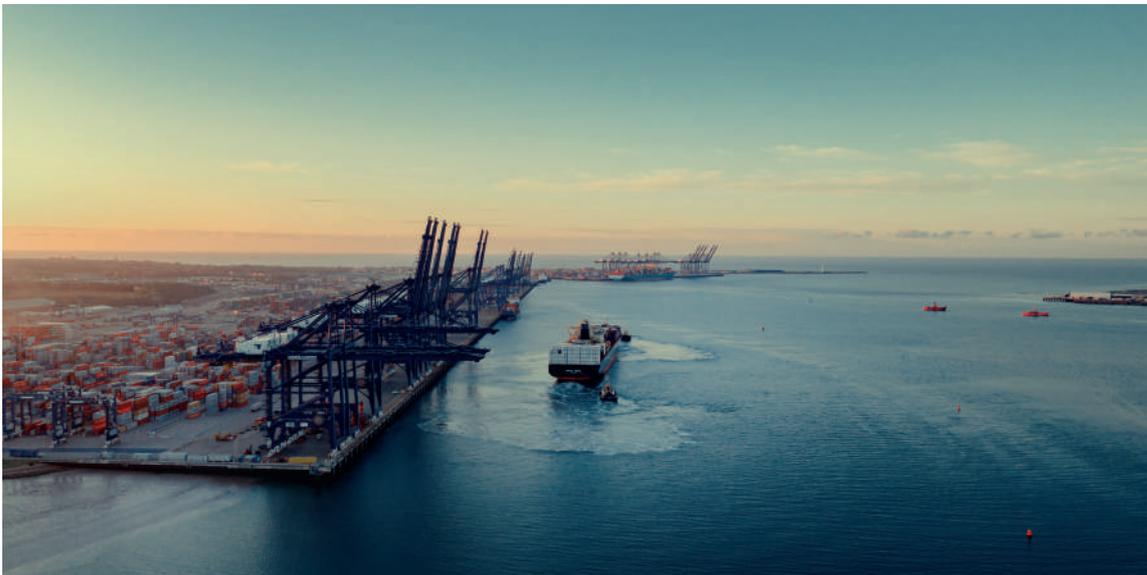
We are committed to continuous training: to develop the skills of all employees and the continuous improvement of the health and safety of all the people in our workplaces, beyond the legal requirements, through the promotion of their health and wellbeing, and the maintenance of ISO 45001 certifications in 27 of our plants.

The company's commitment to equality and diversity in all the countries where it operates is also one of our priorities.



- ***In Good Governance Matters***

It is essential to ensure the management of financial and non-financial risks. We are committed to the ethical management of economic yet sustainable economic growth for the planet, always being respectful and fair with markets and people. For this purpose, we have a **Code of Ethics** that establishes the guidelines for conduct that should guide the actions and behaviour of all our employees in ethical, social and environmental matters, as well as an ethical channel and a **Compliance and Business Ethics Committee (CBEC)** to oversee their performance.



We are committed to complying with current legislation, through a Compliance model and, in the form of adherence, with the authorities and third parties, as well as complying with the responsibilities assumed contractually or on a voluntary basis.

The maintenance of ISO 9001 certifications in 39 of our plants guarantees not only the fulfilment of the requirements agreed with our customers but also the continuous improvement of our services for their benefit.

Cybersecurity is a matter we are actively concerned about in order to ensure the responsible use of information by all parties. We have developed training for our employees and internal control measures to monitor the above commitments.

Sustainability is also a key issue in the evaluation of our suppliers and in Due Diligences for the acquisition of new companies.

We have adhered to the **2030 Agenda** and have sustainability committees to ensure compliance and monitoring, as well as the development of sustainability policies. The company is committed to partnership and is present in several associations in the sector.

VALUES

Tradebe’s values are the basis of its management model and the pillars of the organisation. The group’s lines of action are based on the following values:



2.5 GOVERNANCE

As at 31 December 2022, Tradebe's Board of Directors consisted of five members (one woman and four men), aged between 31 and 73. The members of the Board of Directors meet the criteria of good repute, experience and good governance required by the relevant legislations and cover the range of expertise required by the group's activities.



Josep Creixell
President



Jordi Creixell
Secretary



Maria Creixell
Member



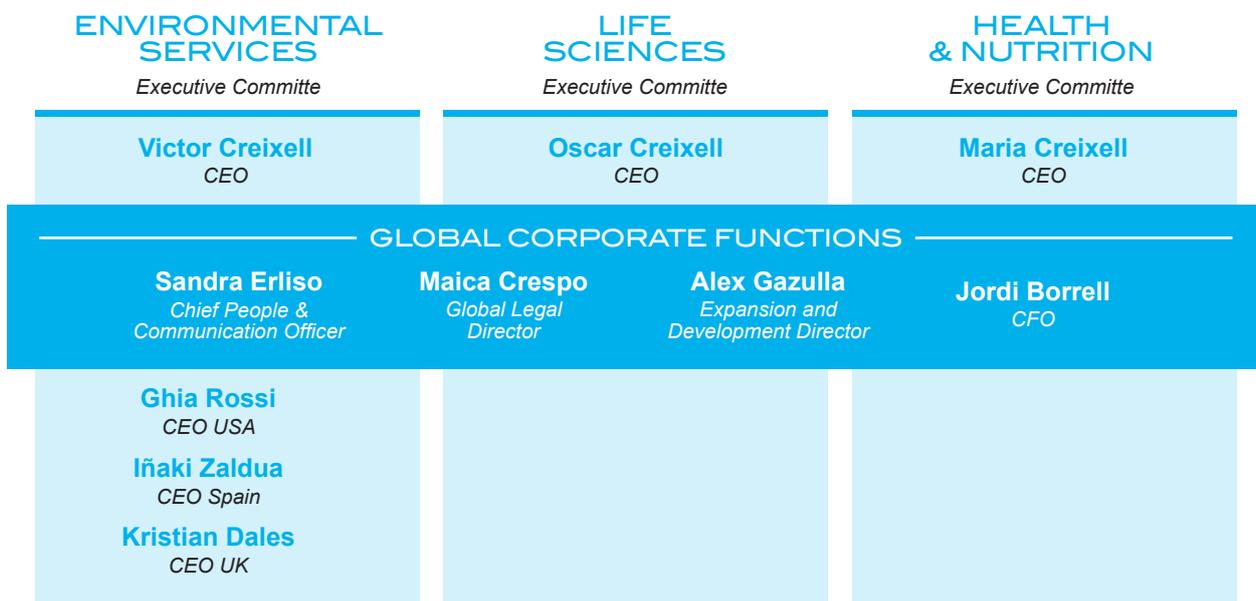
Victor Creixell
Member



Oscar Creixell
Member

During 2022, the Board of Directors met four times to review, be informed on and, if necessary, take decisions on key aspects of the group, including the group results, strategic plan, budget and compliance with regulatory and contractual compliance obligations.

Each of Tradebe's divisions has its own executive committee, consisting of the CEO of the division and the local CEOs (in the case of Environmental Services), with the participation of the global corporate functions.





**OBJECTIVES,
RISKS AND
MITIGATING
FACTORS**

3.1.

INTRODUCTION

Tradebe is an internationally diversified group in sectors and businesses with a relevant industrial component and, at the same time, committed to sustainable development and the wellbeing of people and society in general.

Tradebe's sustainable growth strategy is based on the following **pillars**:

- i. Cost-effective and selective growth (organic and inorganic) by means of :
 - a. Consolidation of the competitive and leadership position in the markets in which Tradebe is already operating.
 - b. Expansion into new markets and sectors.
- ii. Development and focus on the activities most aligned with the *Circular Economy* and the *Waste Hierarchy*.
- iii. Competitive differentiation and improved customer service through the implementation of digitalisation initiatives and improved efficiency of business processes.
- iv. Ensure high levels of execution, service and results through talent attraction, management and retention initiatives.



In addition to all of the above, and with the firm commitment to contributing to sustainable industrial development, Tradebe takes the Sustainable Development Goals into account when defining its strategy.

3.2. COMMITMENT TO THE SUSTAINABLE DEVELOPMENT GOALS

In September 2015, 193 countries adopted the **2030 Agenda** for Sustainable Development and its **17 Sustainable Development Goals (SDGs)**. The SDGs include 169 targets and constitute a universal plan for all countries to eradicate poverty, protect the planet and ensure prosperity for all.

The SDGs are the goal towards which the international community's development efforts are directed until 2030 and are the benchmark against which progress and advancements will be measured.

In its commitment to sustainable development, Tradebe is carrying out actions related to 11 of the 17 SDGs.



The 2022 actions contributing to the SDGs include, among others:

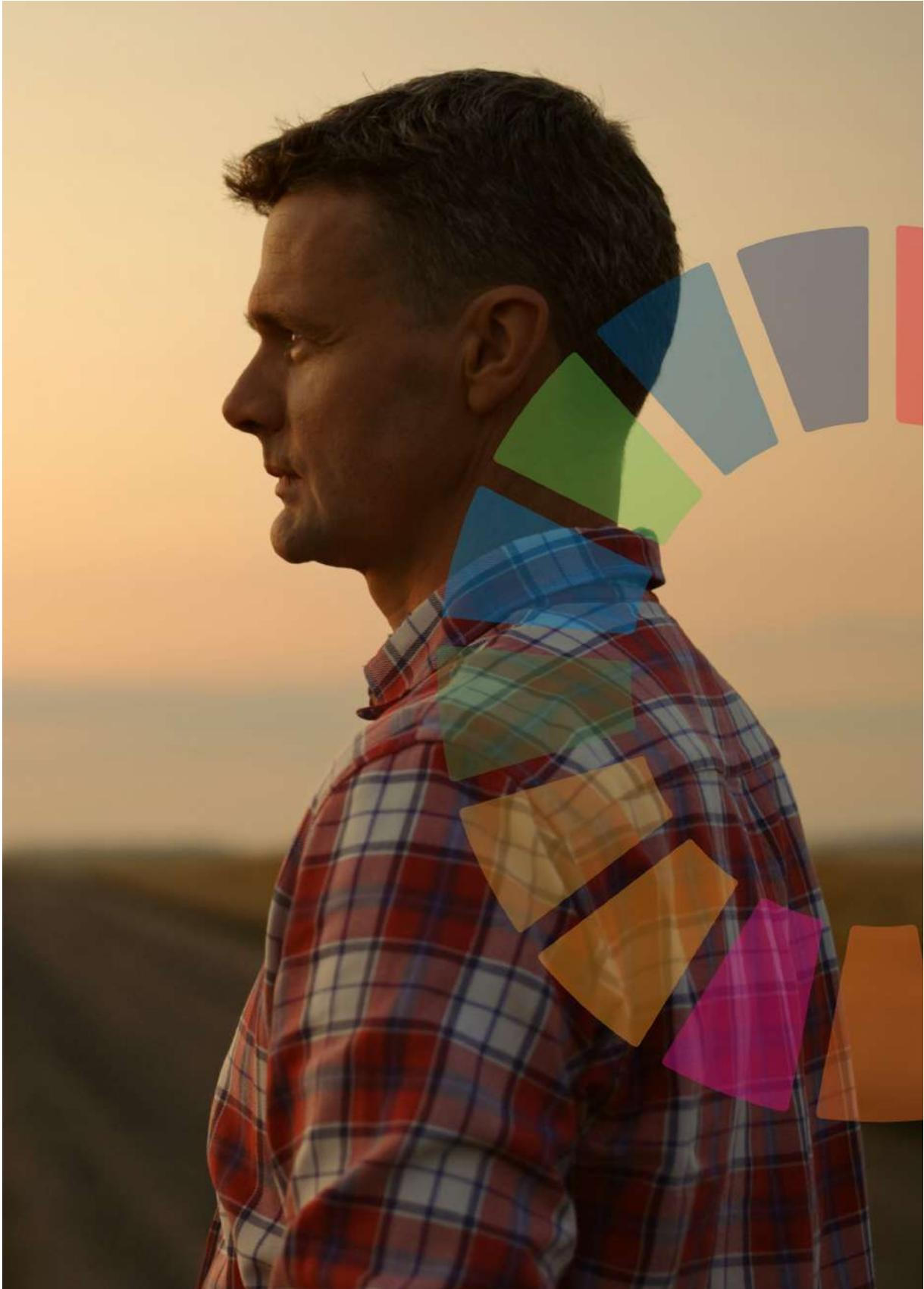
SPAIN

- i. Installation of photovoltaic panels in the Tradebe Igualada office building.
- ii. Improvement of the sanitary water treatment system at the Tradebe Puerto de Bilbao plant.
- iii. ISCC Certification (International Sustainability and Carbon Certification plus) at *Tradebe Puerto de Bilbao*.
- iv. Reduction of electricity consumption through the installation of LED lights at various Tradebe plants in Spain (*Puerto de Bilbao, Puerto de Pasajes*).

UNITED KINGDOM

- v. Obtaining **ISO5001:2018** certification in Energy Management Systems, which contributes to a more sustainable and efficient use of energy.
- vi. Gradual electrification of part of the fleet of lorries used for hospital waste collection.
- vii. The water reuse programme at the Tradebe Gwent plant in the UK has contributed to a 30% reduction in water consumption at the plant compared to the previous year.





3.3.

MAIN RISKS AND MITIGATING FACTORS

Tradebe defines risk as any potential event that impedes the achievement of business objectives, arising from missed opportunities or strengths or the materialisation of threats or potential weaknesses. The company is subject to various risks inherent to the different countries in which it operates and to the different activities it carries out.

Aware of the relevance of this issue, the Board of Directors is committed to developing its abilities to identify, measure, manage and duly control the significant risks that may impact Tradebe's business and its strategy, as well as those generated for third parties as a consequence of the business.

All actions aimed at controlling and mitigating these risks constitute the main pillars of performance:

- Integrate the risk/opportunity perspective into the company's management and include this variable in strategic and operational decisions.
- Segregate functions as far as possible at the operational level and include mitigating controls where this segregation is not possible. Carry out additional control and monitoring activities to ensure the proper functioning of this principle.
- Act at all times in accordance with the law, and in particular with the values and standards of conduct reflected in the Code of Ethics, under the principle of "zero tolerance" for the commission of illegal acts and fraudulent situations.
- Ensure the proper use of hedging instruments and record them in accordance with the applicable requirements for provisions.

The main [non-financial] risk factors to which Tradebe is exposed are related to regulations, cybersecurity and the occurrence of accidents.

CATEGORY	INHERENT RISK	RISK MANAGEMENT
<p>Regulatory</p>	<ul style="list-style-type: none"> • Non-compliance with environmental obligations • Non-compliance with environmental legislation • Non-compliance with Occupational Health and Safety legislation • Litigation and claims 	<p>Tradebe's activities are subject to compliance with strong sector-specific and general regulations in the different jurisdictions in which it operates (accounting, environment, safety, labour, data protection and tax, among others). For example, some of the legislation that clearly affects the organisation is the adaptation of all facilities in Europe to the BREF for Waste Treatment (Best Available Techniques Reference Document for Waste Treatment, 2018), the European Union's Climate Action and Green Pact (COM/2019/640 final) and the European Commission's Action Plan for the Circular Economy, dated 11 March 2020.</p> <p>The multi-jurisdictional regulatory framework to which the group's activities are subject requires efforts to meet all regulatory requirements, since failure to comply with any of the multiple precepts required could result in, among others, the revocation of licences, permits or authorisations or the imposition of fines or penalties that hinder or, eventually, prevent the development of all or part of Tradebe's activities.</p> <p>The management approach is to consider this risk as an opportunity, promoting a culture or way of thinking based on the ethical commitment to do things well, turning strong regulation into an opportunity for constant improvement and as a symbol of excellence. Increasingly stringent environmental legislation means focusing even more efforts on achieving more efficient recycling processes, as well as a greater awareness by customers and society in general.</p> <p>All of Tradebe's businesses operate to a range of best practices and standards, and the integrated management system enables activities to be managed as efficiently as possible while meeting the requirements of a world-class organisation in terms of environmental and safety issues. A team of 77 professionals is responsible for ensuring the correct implementation of the integrated management system and for carrying out activities that guarantee the prevention of environmental and occupational safety risks.</p>

CATEGORY	INHERENT RISK	RISK MANAGEMENT
<p>Cyber risks</p>	<ul style="list-style-type: none"> • Exposure to cyber-attacks 	<p>Tradebe is exposed to cyber risks and attacks that could have a negative impact on results, reputation and image.</p> <p>In addition to the strategy of digitalisation and improving the efficiency of business processes, the group has a clear focus on cybersecurity, which is one of the priorities of its strategy.</p>
<p>Accident rate</p>	<ul style="list-style-type: none"> • Exposure of individuals to accidents • Exposure of facilities to incidents 	<p>Tradebe's activities and its employees are exposed to accidents and incidents. The group has a technical advisory service specialising in the safety of people and facilities, supporting the accident prevention. These services include training, preventative inspections, technical advice on health and safety, and technical consultancy services.</p> <p>The management approach is that nothing justifies an accident: all accidents and hazardous situations are preventable and safety must be actively managed.</p> <p>In addition, the group has a team of 77 professionals who are responsible for carrying out activities that ensure the prevention of environmental and occupational safety risks.</p> <p>Care for the health and safety of employees is above and beyond being a priority and has been included as one of the group's values.</p>



**ENVIRONMENTAL
ISSUES**

4.1. MANAGEMENT APPROACH

Environmental issues are a natural and intrinsic part of Tradebe's core business and have therefore been considered as one of the most relevant material issues for the Sustainability Report.

This section will address the following issues considered to be of great relevance in the organisation and in line with the requirements established by Law 11/2018 on non-financial information and diversity:

- Group policies on environmental issues
- Policy outcomes
- Impact of the group's activity on the environment
- Precautionary principle
- Provisions and guarantees
- Circular economy and waste management
- Sustainable use of resources
- Climate change and other emissions management
- Biodiversity protection

Tradebe carries out its activities applying ethical values and sustainability criteria, seeking innovative and high-quality solutions in each of its processes. It combines constant concern for people's health and safety, environmental protection and customer satisfaction with sustainable, ethical and profitable business growth.

Aware of the importance of the health and safety of all employees, environmental protection and customer satisfaction, Tradebe has an integrated quality, safety and environment policy, according to which it is committed to integrating its management system and to focusing its policy on the following basic principles:

- i. To meet the legal or voluntary and stakeholder requirements** applicable to each workplace on safety (industrial and/or serious accident), occupational health and environmental protection.
- ii. To offer a high-quality service** to its clients, as well as to the main relevant stakeholders (private companies, public bodies, etc.) aimed at satisfying their needs and expectations, ensuring their trust and loyalty.

iii. To strive for continuous improvement, based on a strategic analysis of the context of each business, managing the opportunities and risks identified and influencing behaviour related to the prevention of accidents (particularly serious ones) and damage (to health), protection of the environment (including the best possible energy management) and quality assurance.

Promoting a cultural change in the organisation based on three pillars: increasing the commitment and leadership of all workers, giving greater visibility to directors and managers acting as an example and reference and giving a greater role or training to all workers through greater communication, training and facilitating their participation.

iv. To allocate the necessary and sufficient technical and human resources to maintain a documented integrated management system to ensure compliance with this policy.

v. To monitor health and safety in the workplace, both for employees and third parties, according to the inherent risks of each job or activity, eliminating avoidable risks and assessing those that are not avoidable.

vi. To prepare, check and review self-protection plans and emergency measures, as well as improving, systematising emergency planning and managing crisis situations.

vii. To collaborate with the administration, the competent public bodies and other business associations in the search for solutions to the environmental problems of our society.

viii. To promote pollution prevention and environmental protection, giving priority to the application of technology and processes based on minimisation and recovery criteria, assisting its clients in the European objective of a Circular Economy.

ix. To minimise the impact on the environment and the health and safety of workers and stakeholders and manage change appropriately.

x. To promote the development of the talent of all employees through information, training and awareness in the achievement of the established objectives of continuous improvement.

xi. To ensure the correct coordination of business activity which is necessary to ensure that the existing legal requirements and the applicable internal regulations to the work to be carried out are complied with.

All of Tradebe's businesses operate to a range of best practices and standards, and the integrated management system enables activities to be managed as efficiently as possible while meeting the requirements of a world-class organisation in terms of environmental and safety issues. The integrated management system covers all employees and all workplaces in the organisation.

A team of 77 professionals in the United Kingdom, the United States, Spain, Italy and Germany is responsible for ensuring the correct application of the integrated management system and for carrying out activities that ensure the prevention of environmental and occupational safety risks.

4.2. GROUP POLICIES ON ENVIRONMENTAL ISSUES

Tradebe has developed an **Integrated Management System** which, together with the safety requirements included in the plant permits, provides a framework to ensure that risks and opportunities are **identified, communicated and controlled** in all operations. Safety, Health and Environmental Quality are an integral part of the business and, consequently, optimum performance is expected in this regard.

All activities, processes and services are taken into account for the environmental risk analysis, including those activities that are not directly carried out by Tradebe, but over which the group can exert some influence. Similarly, the time dimension is considered a relevant factor, since not only the impacts of current activities are taken into account, but also those impacts of future actions (i.e., soil decontamination, out-of-use underground tanks, expansion of current facilities, etc.).

In short, the integrated management system considers all the factors associated with the group's activity, based on its knowledge of the activity, as well as any other available information (interviews with operations, checklists, studies, etc.).

The methodology used for risk assessment is based on the identification of actions and working conditions that pose a potential risk. Consequently, following an appropriate assessment, the necessary preventative measures are implemented to eliminate/mitigate and control such risks.



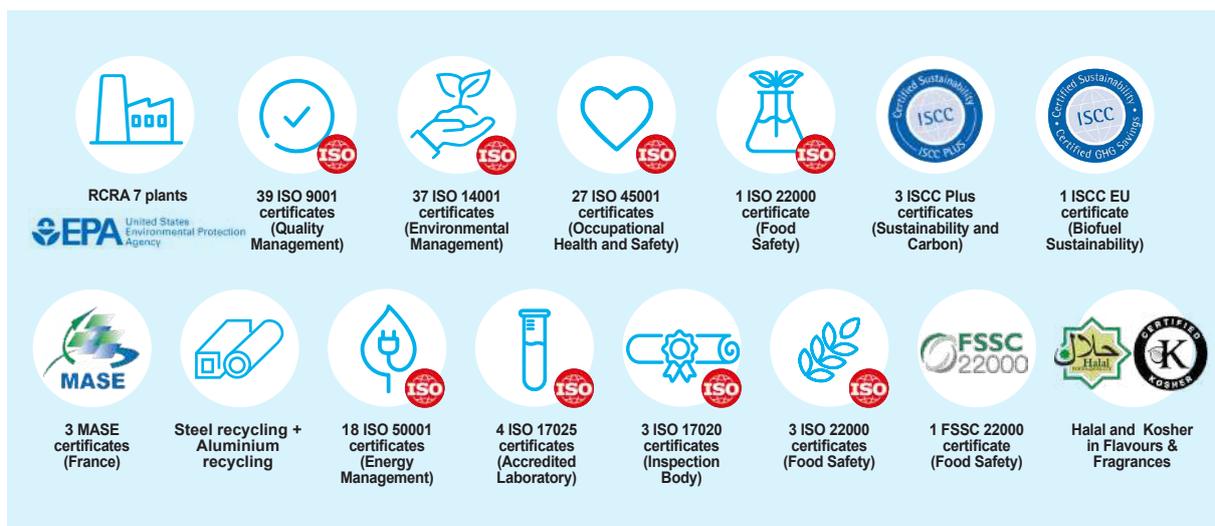
There is a wide range of inherent risks associated with the group’s activity, including both those related to the health and safety of individuals and those related to environmental issues. Following the analysis in section 1.2, the following environmental risks have been identified as material:



These risks are managed and minimised through the:

- Implementation and maintenance of adequate **safety systems** in plants;
- Execution of **regular inspections at the plants on the basis** of specific programmes;
- Spill **prevention** and containment procedures; and
- Preventative **procedures**, e.g., accidental ignition and/or reaction between incompatible materials or wastes.

ISO certifications, integrated environmental authorisations and **Resource Conservation and Recovery Act (RCRA)**⁵, permits provide the framework for the Group’s health, safety and environmental policies. These policies set out both the frequency and the scope of inspections and represent the fundamental basis for preventing the aforementioned environmental risks.



⁵ Applicable in the United States. RCRA permits are issued by the states or by the EPA (United States Environmental Protection Agency). They set out the requirements for the treatment, storage and disposal of hazardous waste, as well as the frequency of inspections and their scope.

Tradebe's environmental permits and international certifications, verified through intensive inspections by the relevant authorities, are proof of the group's ongoing commitment to compliance with legal and environmental requirements.

In addition, external audits carried out at all ISO-certified sites are complemented by environmental performance reports sent periodically to the relevant authorities, as well as by internal audits.

In summary, all of Tradebe's operations are focused on **waste management efficiency**, with controlled consumption of raw materials, natural resources and energy consumption being fundamental parts of achieving this. Each risk is managed and prevented as efficiently as possible, depending on its nature. For example:

 <p>Regular safety inspections</p>	<p>Drum and container storage areas are regularly inspected for structural integrity and proper sealing. In addition, processing, storage, laboratory and office areas are equipped with easily accessible fire extinguishers, first aid kits, eyewash stations and emergency equipment to deal with spills and spillages. Emergency equipment is properly inspected according to the established schedule, even more frequently if necessary, and specific training in the use of emergency equipment is provided to plant personnel.</p>
 <p>Prevention of accidental spills and spillages</p>	<p>In order to prevent the risk of groundwater contamination, the discharge of hazardous waste onto unprotected land is not permitted. The storage areas for tanks and containers are built on a concrete base that has certain characteristics to control and prevent the risk in case of spills. Any accidental spillage that occurs in these areas is collected and analysed. In the event of a spill, the waste, including the absorbent material used to clean it up, is stored, treated or disposed of appropriately.</p>
 <p>Fire prevention measures</p>	<p>With regard to the risk of ignition, there are measures to prevent possible fires and/or chemical reactions, all with the aim of ensuring, among others, that conditions of extreme heat, high pressure, fire, explosions or violent reactions do not occur, as well as to avoid uncontrolled emissions of toxic gases that could be a health hazard.</p>
 <p>Emission control systems</p>	<p>As far as environmental pollution is concerned, the plants have individual emission control systems that are subject to strict regulation (state and/or regional), and always in accordance with international permits and certifications.</p>

4.3. POLICY OUTCOMES

As a result of the implementation of environmental policies required by international permits and certifications, and as an integral part of the integrated quality management system, plant upgrades are carried out every year with the aim of improving efficiency and safety.

For example, the following improvements have been made:

- Continuous review of processes with the aim of seeking improvements to help reduce the carbon footprint
- Improvements to lighting in plants and warehouses
- Improved plant signage and tank identification improvements
- Construction of fixed structures to facilitate the emptying of containers, improving ergonomics for workers
- Renegotiation of electricity contracts to ensure renewable energy supply in as many cases as possible



CASE STUDY | ENERGY EFFICIENCY IMPROVEMENTS AT TRADEBE IGUALADA

Tradebe has a water treatment and recovery plant located in Igualada, Spain. At this location, the collection, treatment and distribution of local and industrial wastewater is carried out by means of different physicochemical and biological treatments.

The challenge: Efficient energy consumption and reduction of CO₂

In such a plant, it is estimated that up to 60% of the energy consumption is related to the aeration system (known as the “blowers”). For this reason, choosing an energy-efficient blower is key to achieving the most efficient energy consumption possible. In this respect, the replacement of the blowers in biological wastewater treatment reactors with state-of-the-art equipment represents an important step forward:



- Improved energy efficiency: the screw-blower component selected by Tradebe is 30-40% more efficient than a traditional lobe blower, which reduces energy costs.
- Innovative oil-free screw component: Teflon-coated rotors provide extremely high energy efficiency compared to traditional lobe blowers.
- Reliability: an integrated oil pump and oil cooler supply cooling oil to bearings and gears.
- Air quality: it has an oil-free compression component (compliant with ISO 8573 Class 0 certification) to ensure air quality.

As a result of the replacement of the aeration system, a **reduction in CO₂ emissions of 59.53 tonnes per year and a saving of 238,000 kWh/year has been achieved.**

In addition to the replacement of the aeration system, 48 photovoltaic panels (26kw) were installed in April 2022 to supply the service building, workshop and offices, and the fleet was upgraded to an electric one.

The benefits obtained in the 12 months following the installation of the panels are as follows:

- 14.180kg of standard carbon saved
- 16,83 tonnes of CO₂ emissions avoided
- The equivalent of planting 23 trees

4.4.

IMPACT OF THE GROUP'S ACTIVITY ON THE ENVIRONMENT

Tradebe's activity has made considerable positive impacts on the environment due to its recycling and waste recovery business. One of the group's objectives is to recycle as much as possible.

With its core business, Tradebe contributes to sustainability through the recovery of raw materials (metals, solvents, oils), as well as through the generation of electricity and alternative fuels from waste, contributing to the reduction of the use of fossil fuels such as coal and fuel oil (in the cement industry, for example).

Anything that cannot be recycled or used as an alternative energy source is treated using a range of technology, with disposal in a controlled deposit being the last option.

With the aim of minimising the impact of waste on the environment Tradebe serves a wide range of industries, including chemical, petrochemical, agrochemical, refineries, oil and gas production and exploration, energy, transport and mining, among others. It also helps us to comply with the relevant environmental regulations.

In addition, the option of providing industrial services at the customer's premises provides a holistic approach to the waste management service.

Due to the high levels of regulation, the emission limits set by the regulator, for which Tradebe's business achieves very good levels of compliance, and the group's high level of commitment to ethical compliance, it can be said that the group's activity does not pose a threat to health and the environment.

With regard to the resources dedicated to the prevention of environmental risks, and taking into account the group's activity, all of Tradebe's employees are undoubtedly dedicated in one way or another to the prevention of environmental risks by providing efficient recycling/recovery of the waste generated by its customers.

In addition to using assets and technology that ensure a minimal environmental impact, such as energy-efficient or low-consumption equipment and emission control systems, Tradebe has a large team of highly qualified technical professionals in the field of the environment. The Quality, Safety and Environment area is integrated into the rest of the organisation, so that also in positions other than these technical profiles there is also a high degree of knowledge, authority and responsibility to act in environmental issues.

4.5. PRECAUTIONARY PRINCIPLE

The precautionary principle is a concept that supports the adoption of protective measures when there are substantiated suspicions that certain products or technology create a serious risk to public health or the environment, but there is not yet definitive scientific proof.

This principle is fully integrated into the operational control processes and is reviewed through the many policies and programmes implemented at Tradebe. In addition, for the Group's activities in Europe, this principle becomes mandatory because the European Union applies it in its legislation when regulating the Environment and Occupational Risks.

4.6. PROVISIONS AND GUARANTEES

The group covers environmental risks through its General Liability and Pollution and Environmental policies, in order to cover possible cases of accidental contamination of the air, soil, flora or fauna (or any other circumstance legally considered harmful to the environment), caused by the activity carried out by Tradebe both at its own facilities and at third-party facilities, and arising from unforeseen circumstances. Specifically, the group has the following coverage related to environmental risks:

- *Environmental Liability Policy*, which covers companies located in Europe. The policy covers up to 8.6 million euros per claim and annual aggregate.
- *Contractor's Pollution Liability and Professional*, which covers the off-site activity of Tradebe's American companies, for an amount of \$15 million per claim and in the annual aggregate.

- *Site Pollution (RCRA - MidWest)*, which covers the activity at the Tradebe facilities of the American companies located in Connecticut, Massachusetts and New York with RCRA permits (to manage hazardous waste), for an amount of \$8 million per claim and \$37 million in the annual aggregate.
- *Site Pollution (RCRA – TN, IN, WI)*, which covers the activity at the Tradebe facilities of the American companies located in Tennessee, Indiana and Wisconsin with RCRA permits (to manage hazardous waste), for an amount of \$4 million per claim and \$18 million in the annual aggregate.
- *Site Pollution (Non-RCRA)*, which covers the activity at the Tradebe facilities of American companies that do not manage hazardous waste, for an amount of \$2 million per claim and in the annual aggregate.
- *Pollution and Remediation Legal Liability (Aaron Oil)*, which covers the activity outside the American company Aaron Oil, the activity in the facilities of this company and transport, for an amount of \$10 million per claim and in the annual aggregate.

As specified in Note 21.1 of the Tradebe Medio Ambiente Group's consolidated annual report, the group has provisions for asset decommissioning and environmental provisions amounting to €48.8 million (€44.2 million in 2021).

4.7. CIRCULAR ECONOMY AND WASTE MANAGEMENT

Tradebe works to provide sustainable, innovative and high-quality solutions that contribute to improving the environment in a responsible way. The group's processes prioritise the recycling and recovery of materials whenever possible, contributing to the circular economy.

The following examples are a sample of Tradebe's activities surrounding the circular economy and improving waste management:

CIRCULAR ECONOMY IN MARITIME TRANSPORT

Since 2015, Tradebe has been researching improvements in the MARPOL⁹ (*Maritime Pollution*) transformation processes for its subsequent reuse as fuel.

Tradebe has a port services division with extensive experience in the environmental management of MARPOL waste, whose business is carried out under the umbrella of a sustainable strategy aligned with the SDGs. In particular, SDG 14 of the United Nations on the conservation and sustainable use of oceans, seas and marine resources for sustainable development.

The results obtained from the process improvements to transform MARPOL have demonstrated that the circular process is possible, converting the waste into a high-quality product, with a performance comparable to that of virgin fuel, while meeting the parameters required by the International Maritime Organization for any other marine fuel.

This process not only makes it possible to produce high-quality marine fuel from MARPOL waste, but also enables the halving of energy consumption compared to traditional recovery processes, while contributing to the reduction of CO2 emissions in terms of exploitation of traditional fossil fuels.



⁹ MARPOL stands for MARine POLLution and refers to the International Convention for the Prevention of Pollution from Ships or MARPOL 73/78. MARPOL 73/78 is a set of international regulations whose main objective is the preservation of the marine environment and the prevention of marine pollution from shipping through the complete elimination of pollution by oil (Annex I of the Convention) and other harmful substances (Annexes II to VI of the Convention), as well as the minimisation of accidental discharges. MARPOL 73/78 was initially developed by the International Maritime Organization (IMO), the UN agency specialised in regulating shipping.

ISCC EU AND ISCC PLUS CERTIFICATIONS

On 5 December 2022, Tradebe obtained two sustainability certificates at its plant in the port of Bilbao:



The **ISCC Plus Certificate** for Tradebe Green Fuel (TGF) produced from MARPOL waste, Annex I.



The **ISCC EU Certificate** for Annex II wastes (X, Y) caused by maritime transport and generated during the pre-flushing of tanks carrying the products contained in Chapter 17 of the IBC Code.

With this certification (ISCC Plus), Tradebe Puerto de Bilbao becomes Tradebe's second ISCC Plus-certified plant. Tradebe Port de Barcelona obtained its ISCC Plus certification for Tradebe Green Fuel (TGF) in June 2019.

The International Sustainability and Carbon Certification (ISCC) is an internationally-recognised, practical and transparent scheme to ensure the circular traceability of the collection, treatment and recycling process of ship-generated waste.

ISCC voluntary scheme reinforces the adoption of sustainable daily practices at work, as well as in each of the elements that make up the custody chain of waste and finished products.

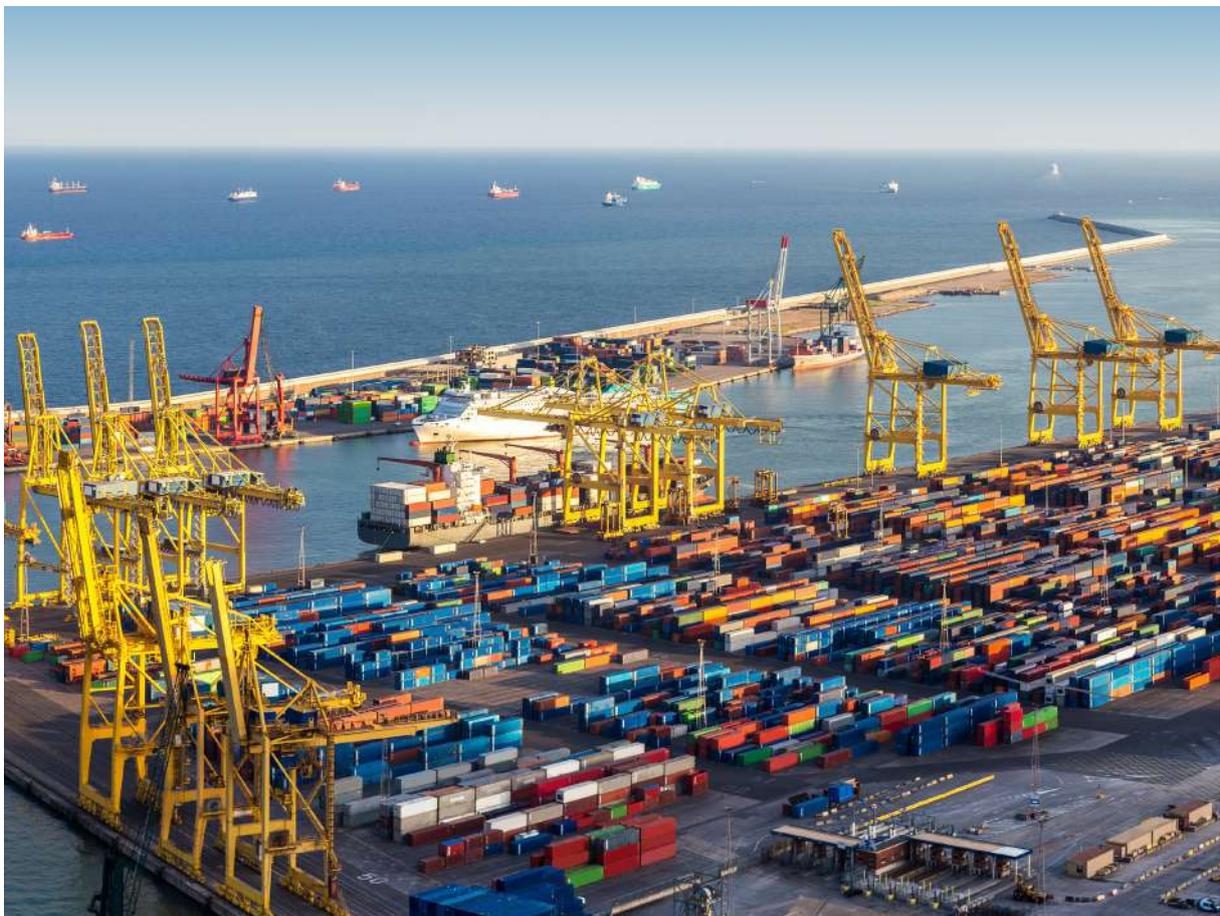
Since obtaining this certification, all products from MARPOL waste are issued with a recognised Declaration of Sustainability.

After a long professional career as a Port Service for the reception of waste from ships and MARPOL cargo waste, Tradebe can reaffirm its commitment reflected in a positive impact on both the environment and our society.

NEW CONCESSION AT THE PORT OF BARCELONA

At the end of 2020, after the end of the concession that Tradebe had held to date in the **Port of Barcelona**, the Barcelona Port Authority awarded the group company, Ecológica Ibérica y Mediterránea, a new 23-year concession for a surface area of 24,204m². This concession is linked to an investment commitment for the construction and operation of a new plant for the treatment of industrial and maritime waste (mainly from ships) in the Port of Barcelona and allows the business to continue in more modern facilities.

The project is aligned with the Circular Economy Objectives of the European Union and considers the best available techniques in environmental matters, anticipating the implementation of Directive 2010/75/EU, which sets out the best available techniques (BAT) in the treatment of waste.



RECOVERY OF COFFEE CAPSULES

Tradebe Valdilecha, an environmental centre located in Madrid, has had different waste management lines in place since its inception in April 2011, focused on prioritising waste recovery over disposal. The constant evolution of technology, both in waste treatment and in the production of consumer goods, as well as the types of waste, requires a permanent review and updating of the treatment processes.

For more than ten years, Tradebe has been leading the capsule recycling service in Spain, first, exclusively with Nespresso®, now for the association of all coffee producers, Arecafé, through the **RECICAP**¹⁰

In 2022, Tradebe invested 183 thousand euros in its Valdilecha plant for the treatment of coffee capsules. This project means that from 2022, the Tradebe Valdilecha centre is capable of recovering 100% of the coffee capsule waste admitted, by integrating the recovered fractions into other existing processes at the plant or by referring them to external facilities that will complete their final material recovery:

Refuse-Derived Fuel (RDF): The bags and other debris, which accompany the capsules and are removed in the previous phase, are diverted to the RDF production line, where they will be converted into solid alternative fuels after the corresponding processes.

Compost: The coffee obtained by sieving is subjected to a different composting process in which, after the corresponding refining, maturation and physicochemical control parameters, it will be converted into compost ready for application as an organic amendment in crops that require it (**Valdi Compost**[®]).

Ferrous metals: Although their presence is less frequent, small fractions of ferrous metals and their alloys are always found and are collected separately for recovery.

Plastics and aluminium: Finally, one of the most important fractions of the process is the recovery of the two main types of capsules present in this waste: plastic and aluminium. The segregation of both types of materials is the key to their reintroduction into the value chain of their corresponding raw materials.

¹⁰ The RECICAP[®] Circle is a non-profit organisation formed by 24 coffee manufacturers with the aim of creating, developing and managing an ambitious collective collection and recycling system for used coffee capsules, based on the one created by NESCAFÉ[®] Dolce Gusto[®] and Nespresso[®] in 2010.

TRADEBE PURIFICATION'S BUSINESS CONTRIBUTION TO CARBON FOOTPRINT REDUCTION

Tradebe Purification's business involves the calculation of carbon footprint savings for its customers as an integral part of its services. This saving is generated for every tonne of recycled chemical used instead of virgin chemicals.

In this regard, Tradebe Purification won the 2020 **Sustainability Award** at the **Chemicals Northwest Awards** in recognition of a project that helped support a customer's shift to a circular economy through an annualised net carbon saving of 30,000 tonnes of CO₂ per year.

The project involved establishing a closed recovery loop for a given waste stream, establishing the carbon footprint of the entire process, implementing improvement initiatives to minimise the carbon footprint and ultimately providing the client with auditable carbon saving results for every tonne of recycled chemical used instead of virgin chemicals.

SUPPORT FOR INITIATIVES IN FAVOUR OF THE CIRCULAR

Tradebe is a member of the Pact for a Circular Economy, promoted by the Spanish Association of Special Waste Managers (ASEGRE).



4.8. SUSTAINABLE USE OF RESOURCES¹¹

This chapter includes data from the Environmental Services and Life Sciences businesses.

Data for the Health & Nutrition business division (a business acquired in June 2022, which accounted for only 6% of group revenue in 2022) are currently being analysed and will be reported, where appropriate, in the 2023 financial year and in line with those of the other parameters.

WASTE MANAGEMENT



In 2022, Tradebe’s plants received 2 million tonnes of waste (compared to 1.95 million tonnes in 2021).

Of the total waste received in 2022, 38% was used as raw materials in the plant’s own production and treatment processes, therefore avoiding the consumption of further raw materials.

28% of the waste received has been returned to the market in the form of a recycled/recovered product or recovered material which, in addition to the actual recycling or recovery of a resource, provides a tangible environmental benefit in terms of tonnes of CO₂ absorbed or avoided by the atmosphere (CO₂ emissions avoidance) (and the so-called carbon (CO₂) credits). These products include, among others, recycled and recovered metals, high-quality marine fuel from MARPOL waste (Tradebe Green Fuel), Secondary Liquid Fuel (SLF), Recycled Fuel Oil, high-quality solvents or compost.

¹¹ During the 2022 financial year, Tradebe has implemented improvements in the environmental indicator reporting system, as part of the maturity process and consistency exercise for this type of information and indicators. The criteria, calculations and sources of information used have been revised, improving the consistency and quality of the data, as well as alignment with GRI standards which provides useful information to the report user. This is why the data for 2021 may be modified with respect to the previous year’s report and, in some cases, the comparison of 2022 with 2021 is misplaced because it does not include the same scope (now improved) in both years.

SLF is an alternative liquid fuel made from a mixture of recycled solvents and sold as a fuel for use in cement kilns. In 2022, 51,572 tonnes of this fuel were produced at the Heysham plant in the United Kingdom.

The East Chicago and Millington plants (both in the United States) have produced between them a total of 42,672 tonnes of alternative liquid fuel for cement kilns, and the Saraland plant (Alabama) has produced 20,891 tonnes of Recycled Fuel Oil, an alternative fuel produced by recycling used oils.

The ratio of recycling/recovery to input of tonnes is particularly relevant in the Purification business (73%) and in the Environmental Services plants in the United Kingdom, where it stands at 50%.

22% of the waste received has been disposed of at Tradebe's own plants, either in controlled deposits or in high-temperature thermal treatment plants, where appropriate, once the options for treatment or transfer to other centres have been exhausted, always offering the appropriate treatment according to the waste being treated and existing regulations.

The following is a breakdown of incoming tonnage management by country:

2022						
Tonnes	Total	Spain	United Kingdom	United States	Italy	Germany
Waste Received						
Hazardous	900.299	505.434	284.125	87.460	13.916	9.364
Non-hazardous	1.094.383	572.827	232.443	289.113	-	-
TOTAL INPUT	1.994.682	1.078.261	516.568	376.573	13.916	9.364
Used as raw material	754.048	320.653	290.088	120.027	13.916	9.364
% of total input	38%	30%	56%	32%	100%	100%
High-temperature thermal treatment	46.652	-	46.652	-	-	-
Controlled Deposit	392.488	330.998	-	61.490	-	-
Total removed at the plant itself	439.140	330.998	46.652	61.490	-	-
% of total input	22%	31%	9%	16%	-	-
OUTPUT						
Recycled/Recovered product/material	565.310	208.057 ¹²	276.037	64.790	9.853	6.573
% of total input	28%	19%	53%	17%	71%	70%
For recovery	71.178	37.938	23.331	8.570	1.327	12
% of total input	4%	4%	5%	2%	10%	0%
For disposal	425.374	238.433	70.635	113.874	2	2.430
% of total input	21%	22%	14%	30%	-	26%
TOTAL OUTPUT	1.061.862	484.428	370.003	187.234	11.182	9.015

¹² Includes outputs which, although they have not been considered waste, have undergone a recovery treatment improving their original characteristics, and the material obtained can be assimilated to a product for the purposes of this report.

The information for 2022 includes improvements in the data quality and control environment compared to previous years. As a result, comparison with the previous year's data is, in some cases, misplaced as it does not include the same scope. However, these changes have been made in order to provide clear and relevant information to both internal and external stakeholders.

2021						
Tonnes	Total	Spain	United Kingdom	United States	Italy	Germany
Wasted Received						
Hazardous	883.359	474.977	304.250	95.815	-	8.317
Non-hazardous	1.163.161	645.920	270.312	246.929	-	-
TOTAL INPUT	2.046.520	1.120.897	574.562	342.744	-	8.317
Used as raw material	348.553	296.073	43.234	9.246	-	-
% of total input	17%	26%	8%	3%	-	-
High-temperature thermal treatment	79.099	1.487	47.879	29.733	-	-
Controlled Deposit	397.915	339.458	-	58.457	-	-
Total removed at the plant itself	477.014	340.945	47.879	88.190	-	-
% of total input	23%	30%	8%	26%	-	-
OUTPUT						
Recycled/Recovered product	267.416	151.835	107.800	1.799	-	5.982
% of total input	13%	14%	19%	1%	-	72%
For non-disposal	465.371	435.973	16.810	12.576	-	12
% of total input	23%	39%	3%	4%	-	0%
For disposal	495.444	239.859	123.633	129.551	-	2.401
% of total input	24%	21%	22%	38%	-	29%
TOTAL OUTPUT	1.228.231	827.667	248.243	143.926	-	8.395

ENERGY CONSUMPTION (AND RECOVERY)

221kWh/t
Energy intensit

24%
Renewable energy
sold

PGD
Used as
alternative fuel

Tradebe sells more than 110,000 MWh of energy, which represents 24% of the total energy consumed.

In 2022, the consumption of Tradebe's plants totalled 470,972 MWh, and the recovery, generation and sale of energy amounted to 110,701 MWh, from the recovery and recycling of waste, resulting in an energy balance of 360,272 MWh and therefore **recovering 24% of the energy consumed**.

On average, Tradebe's plants need 221 kWh per tonne of waste received.

The Environmental Services plants are less energy intensive, with those located in Spain consuming the least (57 kWh per tonne received). While Tradebe Purification's plants require a higher energy consumption (1,078 kWh per tonne received) due to the nature of the solvent recovery process by distillation. However, the carbon footprint associated with the process of distilling recycled solvents is much lower than that associated with the manufacture of virgin solvents (in addition to the savings in new raw materials (the planet's resources) involved).

Part of the energy sold (around 30,000 MWh) is generated from biogas. Tradebe is the concessionaire of two energy recovery contracts in the controlled organic matter deposits located in Montalbán de Córdoba and Valsequillo, Spain. In these controlled deposits, biogas is generated by the accumulation of organic matter in an anaerobic environment and the methane it contains is used as fuel to generate electricity by means of combustion engines. This electricity is certified as **renewable energy** and comes with guarantees of origin issued by the **National Markets and Competition Commission (CNMC)** and is transferred to the plants for consumption.

Approximately 50% of the electricity generated from biogas is sold to Tradebe's plants in Spain, and the other 50% is sold to the regulated market (**NEMO, Nominated Electricity Market Operators**). The remaining energy sold (around 81,000 MWh) corresponds to the sale of SLF in the UK¹².

18% of fuel consumption from non-renewable sources corresponds to the consumption of Product Grade Distillate (PGD), which is a fuel oil that comes mainly from the distillation of fossil fuels received at Tradebe Purification's plants. This recycled fuel is used to operate the boilers at Tradebe Purification's plants in the UK, as a sustainable alternative to the use of traditional fossil fuels.

The origin of the electricity consumed is mostly from renewable sources, and where this is not yet the case, the plan is to take the necessary actions as soon as possible.

Here is a breakdown of the energy balance per country and per year:

¹³ As explained in the Waste Management section, SLF (Secondary Liquid Fuel) is an alternative fuel made from a mixture of recycled solvents and sold as "cemfuel" (fuel) for use in cement kilns.

2022						
MWh	Total	Spain	United Kingdom	United States	Italy	Germany
Gasoil, Diesel and Others	107.469	18.988	29.229	59.209	43	-
Natural Gas	183.214	38.364	9.692	122.284	12.874	-
Product Grade Distillate (PGD)	61.473	-	61.473	-	-	-
ENERGY consumption from non-renewable sources	352.156	57.352	100.394	181.493	12.917	-
Biogas	29.766	29.766	-	-	-	-
Consumption of ENERGY from renewables sources	29.766	29.766	-	-	-	-
Electricity Consumption	79.438	21.610	24.389	31.281	1.519	639
Steam Consumption	9.613	-	-	70	-	9.543
TOTAL ENERGY CONSUMED	470.973	108.728	124.783	212.844	14.436	10.182
Energy sold	110.701	29.766	80.935	-	-	-
total % of energy consumed	24%	27%	65%	0%	0%	0%
Energy Balance	360.272	78.962	43.848	212.844	14.436	10.182
INTENSITY: kWh/t input	221	73	242	565	1.037	1.087

2021						
MWh	Total	Spain	United Kingdom	United States	Italy	Germany
Gasoil, Diesel y Otros	99.414	34.332	25.866	39.216	-	-
Natural Gas	106.117	26.636	5.809	73.672	-	-
Product Grade Distillate (PGD)	79.554	-	79.554	-	-	-
ENERGY consumption from non-renewable sources	285.085	60.968	111.229	112.888	-	-
Biogas	30.141	30.141	-	-	-	-
Consumption of ENERGY from renewables sources	30.141	30.141	-	-	-	-
Electricity Consumption	73.573	20.912	24.891	27.139	-	631
Steam Consumption	1.869	-	-	27	-	1.842
TOTAL ENERGY CONSUMED	390.668	112.021	136.120	140.054	-	2.473
Energy sold	124.807	30.141	94.666	-	-	-
total % of energy consumed	32%	27%	70%	0%	-	0%
Energy Balance	265.861	81.880	41.454	140.054	-	2.473
INTENSITY: kWh/t input	176	73	237	409	-	297

WATER CONSUMPTION

70%

Water consumed
in high-temperature
thermal treatment

59%

Water discharged
from wastewater
treatment plant

0,83 m³

of water used per
tonne of
input

1,264 m³

of water
discharged per
tonne of input

Each site monitors the consumption of natural and man-made resources for proper management and for reporting to the relevant authorities. Whenever possible, waste delivered by customers is used as a supply of water, raw materials or additives in the group's treatment processes, thus avoiding the use of new raw materials (resources).

70% of the water consumed in 2022 corresponds to the high-temperature thermal treatment plants located in the United Kingdom (Tradebe Fawley) and the United States (Norlite), to cool the equipment used in the process itself.

59% of the discharged water (clean water returned to the environment) comes from Tradebe's wastewater treatment plant in Igualada, Spain, as a result of the treatment. Here, the water is filtered, treated and discharged into the appropriate environmental channels so that it can be put back into circulation for use in treatment, thus minimising the use of tap water.



Water use and discharge (clean or recycled, returned to the environment) by country and by year is shown below:

2022 ¹⁴						
m ³	Total	Spain	United Kingdom	United States	Italy	Germany
Water Used	1.654.594	224.802	453.674	960.554	15.331	233
Major contributors:						
Port de Barcelona	8%	56%				
Fawley	18%		66%			
Norlite	52%			89%		
Sunderland	3%		11%			
Rye	2%		7%			
Gualba	2%	12%				
Water Discharged	2.520.800	1.924.435	303.540	284.623	7.059	1.143
Major contributors:						
Igualada	59%	77%				
Port de Barcelona	8%	11%				
Fawley	6%		53%			
Gwent	2%		16%			
Norlite	9%			78%		
Meriden	2%			18%		
Fidenza	0%				28%	
Water used	1.654.594	224.802	453.674	960.554	15.331	233
Waste received	1.994.682	1.078.261	516.568	376.573	13.916	9.364
m3/t input	0,830	0,208	0,878	2,551	1,102	0,025
Water Discharged	2.520.800	1.924.435	303.540	284.623	7.059	1.143
Waste Received	1.994.682	1.078.261	516.568	376.573	13.916	9.364
m3/t input	1,264	1,785	0,588	0,756	0,507	0,122

2021						
m ³	Total	Spain	United Kingdom	United States	Italy	Germany
Water used	470.867	219.346	183.786	67.735	-	-
Water discharged	2.331.451	1.765.395	251.000	313.309	-	1.747

Wherever possible, technological innovations are introduced to reduce water consumption.

¹⁴The % represent the volume of water used or discharged by the plant with respect to the total used or discharged in each territory. The sum of the % is not 100% because only the most significant plants are shown.

4.9.

CLIMATE CHANGE AND MANAGEMENT OF OTHER EMISSIONS

Tradebe is clearly committed to minimising its impact on the environment.

One of the many examples of this commitment is the adherence of several UK plants to a **Climate Change Agreement**. This is a voluntary agreement between industry and the UK Environment Agency to reduce energy use and carbon dioxide emissions, which is formally structured with a system of incentives to promote energy efficiency by setting targets and penalties for non-compliance. This agreement covers the period 2013-2023 and since joining, Tradebe has been above target in every period.

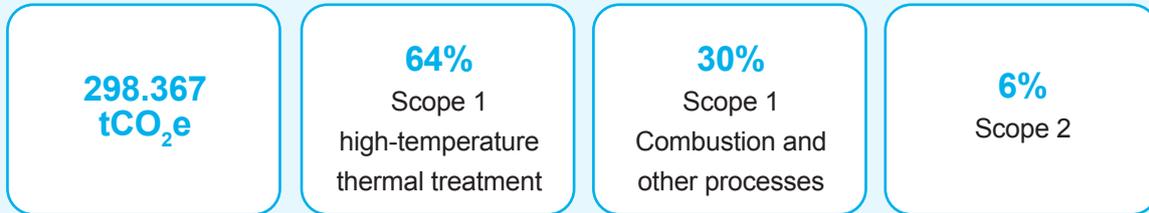
In addition, Tradebe is committed to reducing, through its actions, the pollution that causes climate change on Earth and to forming part of the **#PorElClima (#ForTheClimate)** Community, a pioneering initiative of people, companies, organisations and public administrations that unite with a common goal: to be protagonists in the action against Climate Change in accordance with the guidelines set out in the Paris Agreement, limiting emissions so that the average temperature of the planet does not exceed 1.5°C above pre-industrial levels, and that carbon neutrality is achieved by 2050.

Within the framework of this commitment, Tradebe carries out the following activities, some of which are aimed at reducing resource consumption and, indirectly, the associated emissions:

- Reducing energy consumption in wastewater treatment plants
- Using dual-flush or interruption systems in toilets
- Using water-saving devices
- Perform proper maintenance of energy-consuming systems
- Reduce energy consumption in water treatment plants
- Improving energy efficiency in processes by 10-20%
- Implementing videoconferencing or online meeting systems
- Implementing waste recovery and recovery systems
- Reusing waste in production processes

According to what is stated in all the Integrated Environmental Authorisations granted to the group, the sites have the appropriate work equipment to ensure that the established limits are complied with. This is confirmed in the periodic measurements carried out by third parties (bodies collaborating with the administration).

EMISSIONS MANAGEMENT



The main source of Tradebe’s atmospheric emissions are combustion products (CO₂, CO, NO_x, SO₂, etc.) resulting from steam boilers used in thermal treatment plants which are directly related to the combustion of fuels.

There are strict emission limits and limit values for thermal treatment plants and Tradebe has the necessary permits issued by the relevant environmental authorities to meet these specifications.

Greenhouse Gas (GHG) emissions are classified as follows:

- **Direct Emissions (Scope 1)**, originating from the consumption of fuel from stationary sources, from sources owned or controlled by the company (e.g., combustion in boilers, furnaces and turbines) and from mobile sources, from the transport of materials, products, waste (forklifts and shovels moving on and off site, including barges, ships, tankers and trucks owned by the company).
- **Indirect Emissions (Scope 2)**, derived from the company’s business, but generated by other third parties, including emissions derived from the generation of electricity purchased by the company for consumption.
- **Other emissions** of nitrogen oxides (NO_x), sulphur oxides (SO_x) and particulate matter also originate from the burning of fossil fuels.

In 2022, Tradebe has generated a carbon footprint corresponding to 298,365 tonnes of CO₂ equivalent, as a result of the sum of Scope 1 and Scope 2 emissions.

The majority of Scope 1 emissions (64%) come from the unavoidable CO₂ generation from waste management by high-temperature thermal treatment. This process accounts for 4% of the tonnes of input.

The vast majority of tonnes of input (98%) have an associated carbon footprint that represents only 30% of the total Scope 1 emissions.

Electricity consumption accounts for 6% of the carbon footprint (by Scope 2 emissions). This is partly as a consequence of Tradebe's efforts to procure electricity from renewable sources.

The volume of Scope 1 and Scope 2 emissions by source and country is shown below:

2022						
tCO ₂ e	Total	Spain	United Kingdom	United States	Italy	Germany
Scope 1 - Combustion						
Combustion emissions - transport	16.084	-	6.169	9.915	-	-
Combustion emissions - plant	64.782	12.977	18.392	30.802	2.611	-
TOTAL SCOPE 1 - COMBUSTION	80.866	12.977	24.561	40.717	2.611	-
SCOPE 2 (electricity)	16.991	1.032	5.081	8.094	527	2.257
SCOPE 1 (combustion) + SCOPE 2	97.857	14.009	29.642	48.811	3.138	2.257
Scope 1 - processes						
Composting	7.534	7.534	-	-	-	-
High-temperature thermal treatment	191.397	-	115.644	75.753	-	-
Water treatment	1.054	1.054	-	-	-	-
TOTAL SCOPE 1 - PROCESSES(*)	199.985	8.588	115.644	75.753	-	-
Fugitive emissions of Biogenic Co₂(*)	525	525	-	-	-	-
TOTAL SCOPE 1 + SCOPE 2	298.367	23.122	145.286	124.564	3.138	2.257

(*) Process and fugitive emissions have started to be calculated from 2022 onwards.

Tonnes of entries	1.994.682	1.078.261	516.568	376.573	13.916	9.364
tCO ₂ e	298.367	23.122	145.286	124.564	3.138	2.257
tCO₂e/t input	0,150	0,021	0,281	0,331	0,225	0,241

2021						
tCO ₂ e	Total	Spain	United Kingdom	United States	Italy	Germany
Scope 1 - combustion						
Combustion emissions - transport	14.698	-	6.112	8.586	-	-
Combustion emissions - plant	48.262	19.459	14.017	14.786	-	-
TOTAL SCOPE 1-COMBUSTION	62.960	19.459	20.129	23.372	-	-
SCOPE 2 (electricity)	12.710	1.570	4.430	6.234	-	476
SCOPE 1 (combustion) + SCOPE 2	75.670	21.029	24.559	29.606	-	476

The emissions of nitrogen oxides (NO_x), sulphur oxides (SO_x) and other significant air emissions emitted by the organisation's facilities are detailed below:

2022						
Tonnes	Total	Spain	United Kingdom	United States	Italy	Germany
NO _x	296	10	207	75	4	-
SO _x	151	20	3	128	-	-
Persitent Organic Pollutants (POPs)	-	-	-	-	-	-
Volatile Organic Compounds(VOCs)	52	1	38	13	-	-
Hazardous Air Pollutants (HAPs)	16	0	-	16	-	-
Particule Matter(PM)	20	14	4	2	-	-
Heavy Metals	11	-	-	11	-	-
Others(*)	30	-	-	30	-	-

2021						
Tonnes	Total	Spain	United Kingdom	United States	Italy	Germany
NO _x	12	11	-	1	-	-
SO _x	28	28	-	-	-	-
Persitent Organic Pollutants (POPs)	-	-	-	-	-	-
Volatile Organic Compounds(VOCs)	54	43	6	5	-	-
Hazardous Air Pollutants (HAPs)	3	-	-	3	-	-
Particule Matter(PM)	34	34	-	-	-	-
Heavy Metals	-	-	-	-	-	-
Others(*)	-	-	-	-	-	-

The Volatile Organic Compounds resulting from the organic processes carried out in the chemical treatment plants (production of chemicals and liquid fuel) are regularly monitored by the plant's staff in

order to ensure that they do not exceed the emissions allowed by the relevant environmental authorities.

As part of its commitment to improve emissions management, Tradebe has joined the **HFC (hydrofluorocarbon) Reduction Pact**, promoted by the Spanish Association of Special Waste Managers (ASEGRE).

CONTRIBUTION TO CARBON FOOTPRINT REDUCTION

The use of recycled products contributes to the reduced use of raw materials, which turns processes such as recovery and recycling into key tools in reducing the carbon footprint.

Comparing the emissions generated during the recycling process with those generated in the production process of virgin materials results in what is technically known as emission avoidance.

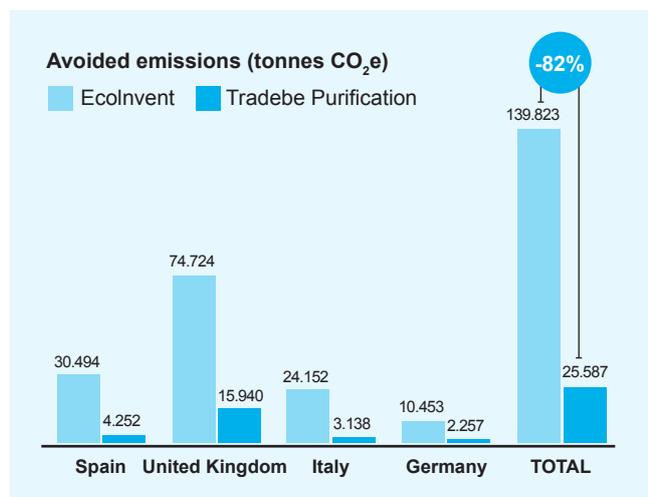
In 2022, Tradebe carried out an emission avoidance study, based on its solvent recovery (Tradebe Purification), composting and iron and aluminium recycling operations. In each case, the conclusions are:

- **Tradebe Purification¹⁵:**

On average, the recycling, recovery and purification of solvents at Tradebe generates greenhouse gas emissions that are **82%** lower than the emissions generated in the production of virgin solvents.

In total, this represents a **saving of 114,236 tonnes of CO₂ equivalent (emission avoidance)** to the atmosphere compared to the production of virgin solvents. In other words: the equivalent of the amount of CO₂ absorbed by 7,140 mature trees in one year¹⁶.

Furthermore, it indicates that, although Tradebe Purification's processes are energy intensive (as explained in the "Energy consumption" section), its recycling activities (circular economy) provide a much more sustainable alternative to virgin solvent production (linear economy).



¹⁵ In order to compare Tradebe Purification's emissions with the industry average, the Ecolnvent database has been used.

¹⁶ Taking into account that, on average, 16 large mature trees absorb 1 tonne CO₂ in a year.

- **Composting:**

Tradebe's plants in Lugo, Valdilecha and Jorba generate compost that can be used as a substitute for chemical fertilisers.

Emissions from the production of chemical fertilisers have been compared (using the Entreprises pour l'Environnement calculation tool as a reference) which led to the conclusion that the production of 1 tonne of compost from Tradebe results in a saving (or emission avoidance) of 14.1kg of CO2 equivalent in the atmosphere. In other words, the **42,574 tonnes of compost produced at Tradebe in 2022 have avoided emissions of 600.3 tonnes of CO2 equivalent (the CO2 absorbed by 37 adult trees in one year).**

- **Iron and aluminium:**

The production of iron and aluminium from original sources is energy intensive, making the recycling of these materials a much more sustainable alternative.

Tradebe's plants in Vallbona and Amorebieta recycled 113,082 tonnes of iron and 23,059 tonnes of aluminium in 2022. Compared to the production of these original materials, **Tradebe's business at these plants has saved the atmosphere 437,920 tonnes of CO2 equivalent (or the CO2 absorbed in a year by 27,370 large mature trees).**

SCOPE 3 EMISSIONS

In order to be able to calculate the carbon footprint in the most representative way possible, to understand where emissions are generated in its value chain and to be able to manage them, Tradebe has started to calculate Scope 3 emissions for the parameter of Environmental Services in Spain.

These are Tradebe's indirect responsibility, as they are accounted for by greenhouse gas emissions from purchased goods and services (classed as "upstream") and indirect emissions related to products or services sold ("downstream").

Specifically, for the calculation of Scope 3 emissions in 2022, those associated with:

- consumption of electricity and fuel production;
- the disposal of waste generated in the company's own operations. Specifically for this first year, and given that the emission factors for all the waste generated are not available, only the indirect emissions associated with the treatment of wastewater from Tradebe's plants have been included;
- emissions from transporting employees for business-related activities and with vehicles outside the organisation (including air travel, train journeys, hotel nights and car rental travel);
- fuel consumption of leased vehicles; and
- the use of recycled fuel (Tradebe Green Fuel) obtained from Tradebe plants.

Taking into account these elements, as well as the requirements of ISO 14064-1:2019 and the recommendations of the GHG Protocol - Scope 3 guidance, it has been calculated that Scope 3 emissions at Tradebe Environmental Services Spain in 2022 amount to 106,041 tonnes of CO₂ equivalent.

Other parameters are expected to be added to this calculation in the coming years.

4.10. BIODIVERSITY PROTECTION

Due to its location and environmental emergency permits and systems, Tradebe's business has no environmental impact on protected areas.

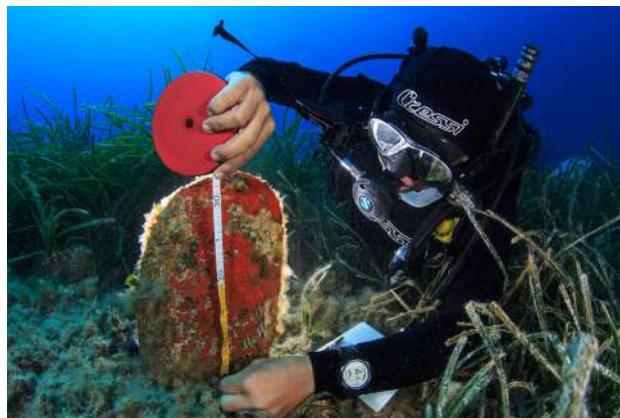
As mentioned in the Code of Ethics, at Tradebe we are aware of the importance of the environment both for society and for our activities.

For this reason, Tradebe has internal regulations on environmental risk management that it will apply meticulously in the development of its activities in order to foresee, avoid and minimise the alteration and damage to the environment.

An example of this is the biodiversity protection study carried out at Tradebe Vallbona, where protected species and species of special interest have been identified in order to ensure their preservation and that Tradebe's activity does not cause any significant impact on them.

Tradebe's Environmental Consultancy business (Tecnoambiente) includes studies related to the environmental assessment process, including environmental impact and incidence studies, for example:

- Wildlife inventories
- Habitat mapping
- Census and status of fish populations
- Determination of ecological flows
- Limnological studies in lakes, marshes and ponds, including issues of environmental restoration
- Natural capital studies and biodiversity strategies

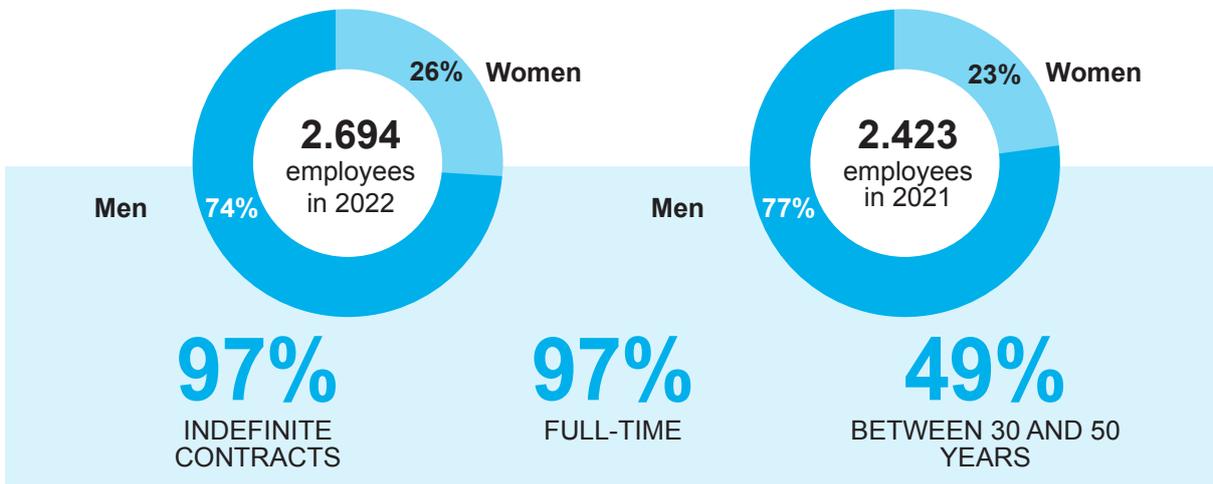




5

**SOCIAL AND
STAFF ISSUES**

This chapter includes data from all of Tradebe’s business divisions. As at 31 December 2022, Tradebe has a team of 2,694 people (2,423 in 2021).



5.1. MANAGEMENT APPROACH

Tradebe has a strong commitment and obligation to create and maintain a working environment where people are treated with dignity and respect. Tradebe’s people are a key asset to the development of the business and it is for this reason that social and staff issues have been considered a material aspect for this Sustainability Report.

Staff issues have a broad scope and impact on the organisation.

In addition to providing quantitative information on the number of employees and different classification criteria, this section will address the following issues considered to be of great relevance in the organisation in line with the requirements established by Law 11/2018 on non-financial information and diversity:

- Policies implemented by the organisation on social and staff issues
- Work organisation
- Health and safety
- Social relations
- Training
- Universal accesibility for people with disabilities
- Equality

5.2.

POLICIES ON SOCIAL STAFF ISSUES

Tradebe's commitment is to attract and hire the right people, involving them in the organisation's project and supporting them in achieving their professional goals.

As a group focused on developing activities in sectors committed to sustainable development and the well-being of people and society in general, Tradebe's employees are a crucial component of the organisation's success; they are the heart of the company and its most important asset.

As a group focused on developing activities in sectors committed to sustainable development and the well-being of people and society in general, Tradebe's employees are a crucial component of the organisation's success; they are the heart of the company and its most important asset.

The development of the human team is one of the pillars on which Tradebe's business model is based. The organisation is committed to attracting, developing and retaining talent. The management and development of human teams are key to achieving the organisation's strategic objectives. The cornerstone of this model is the management of the professional careers of its employees and the organisation's concern to offer them development opportunities, both in terms of education and professional development.

At Tradebe, there is no room for discrimination, harassment, bullying or victimisation, nor the climate of insecurity and loss of productivity that these negative practices cause.

Tradebe's policies on social and staff issues are taken very seriously, and each employee has his or her own area of responsibility in this regard. Any attempt to breach these policies, or any evidence of discrimination, harassment, bullying, or victimisation is unacceptable and sanctionable. Among the policies on social and staff issues, Tradebe has a **Code of Ethics** that includes the organisation's holistic philosophy and values and aims to ensure Tradebe's long-term success around the world through appropriate employee conduct. The Code of Ethics is also part of the onboarding of all new employees so that they are aware of the values of reference in the organisation and what is expected of their behaviour on a day-to-day basis.

In addition to the Code of Ethics, there are other policies and guidelines on social and staff issues in the organisation:

- **Equality Policy**, which states that Tradebe is an equal opportunity employer.
- **Selection Policy**, which provides guidelines to be followed in the selection process and reaffirms the organisation's position on equal opportunities.
- **Whistleblowing policy**, which establishes that Tradebe is committed to managing the organisation in the best possible way and in line with its values. To this end, it seeks the cooperation of employees to report any possible irregularity or malpractice that they detect or suspect.
- **Policy against alcohol and drugs in the workplace**, which states that Tradebe's workplaces must be alcohol and drug free in the interest of the employees, in order to ensure a safe, healthy and efficient workplace.

Tradebe's personnel and staff policies are focused on managing and mitigating a number of risks, including:

- Existence of a wage gape
- Failure to respect the right of equality
- Harassment and/or discrimination of any kind
- Failure to respect collective bargaining agreements
- Working in unsafe conditions

Under the leadership of a strong and mature management with regard to social and staff issues, Tradebe promotes **communication and dialogue** with the aim of continuous improvement of its employees and the organisation as a whole. Any employee has access to any member of the Executive Committee to discuss their ideas or concerns.

Risks associated with staff issues are low due to the control mechanisms in place, including the double approval mechanism required for hiring, discipline, compensation, dismissal and other staff-related actions.

In addition, the Human Resources and Quality, Safety and Environment teams have extensive experience in investigating and managing reports relating to incidents that could jeopardise compliance with the organisation's policies.

5.3. WORK ORGANISATION

The working day and applicable work-life balance measures are regulated by the regulatory framework of each territory in which the Group operates and are defined by the collective bargaining agreement applicable in each case.

In application of this regulatory framework, and while working on the development of comprehensive staff policies, Tradebe promotes measures that encourage work-life balance, digital disconnection, disconnection from work, including flexible working hours, the possibility of reduced working hours and the promotion of joint parental responsibility in the event of maternity/paternity.

Tradebe makes efforts and diligently manages the challenge of having work teams located in multiple locations and time zones, as well as ensuring that employees are able to follow individual work schedules and meet their family care responsibilities (work-life balance).

Absences and leave due to COVID

The absence rate by country, and the hours it represents in each case, are as follows:

ABSENCE RATE BY COUNTRY					
	Germany	United States	Spain	Italy	United Kingdom
TOTAL	4,4%	1,9%	1,9%	4,2%	3,0%



This rate is calculated by considering the absences of workers when they were scheduled to be present (without taking into account permitted absences such as holidays, maternity or paternity leave and days off) over the total hours worked.

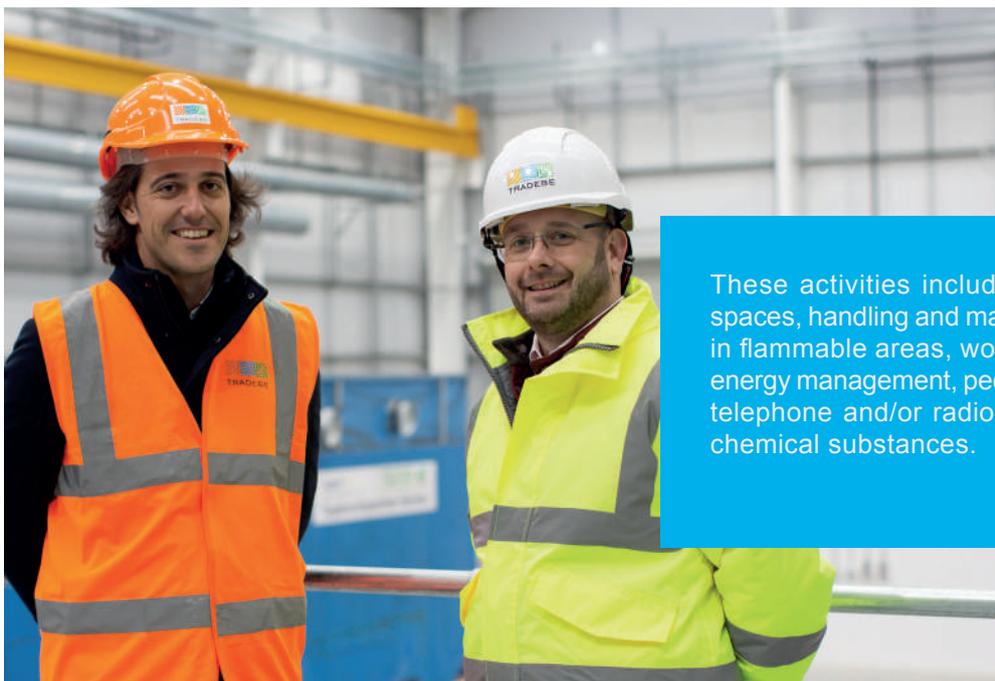
5.4. HEALTH AND SAFETY

The safety of its employees, as well as anyone else who interacts with the group's activities, is considered more than a priority for Tradebe, and as such, health and safety are a fundamental part of corporate strategy.

While workplaces are designed to minimise health and safety risks, accidents and hazardous situations can only be prevented when safety is actively managed and a culture of compliance exists. For this purpose, the organisation has designed, and continues to develop, a philosophy that encourages each and every employee to take responsibility for their own safety, as well as the health and safety of those around them, stipulating that:

- No harm or risk is justified.
- All accidents and potentially dangerous events can be prevented.
- Safety must be actively managed.

To reinforce and extend this culture throughout the organisation, the group has developed safety standards covering the highest risk activities that apply to all workers, subcontracted suppliers and similar professionals.



These activities include working in confined spaces, handling and managing ignition sources in flammable areas, working at heights, waste energy management, pedestrian-vehicle spaces, telephone and/or radio use, and exposure to chemical substances.

EMPLOYEE HEALTH AND SAFETY

Tradebe aims to ensure that its processes are appropriately managed to prevent health problems arising from its activities, and the organisation uses the expertise and knowledge of independent occupational safety consultants to carry out regular health monitoring programmes.

In addition to monitoring the health of its employees, these programmes include advisory services for employees and managers, thus ensuring that the checks to prevent potential negative health impacts are properly identified and implemented.

HEALTH AND SAFETY STATISTICS

Of the 334 incidents reported this year (537 in 2021), 53% correspond to incidents with equipment or in facilities but which have not caused personal injuries (59% in 2021), 35% correspond to personal injuries that have been resolved with first aid (20% in 2021) and the remaining 13% correspond to incidents reported to the relevant authorities and facility inspections. The incidents reported include, among others, accidents resulting in sick leave, low-intensity combustion, splashes or oil spills on land. All of these have been dealt with and remediated appropriately.

With regards to safety, the application of safety standards and as a result of intensive awareness campaigns, 3301 Near Misses were identified and reported internally in 2022¹⁷ (around 3,560 in 2021).

The existence of reporting and monitoring of a significant number of Near Misses is an essential accident prevention and mitigation tool and an excellent indicator of how the organisation “lives” safety on a daily basis and how important employee safety and ensuring a safe working environment are to the Group (the higher the number of Near Misses detected, the lower the number of serious accidents, thanks to early detection and prevention)¹⁸.

In addition, apart from managing incidents that have caused or could have caused harm, Tradebe encourages and incentivises its employees to make risk communications and suggestions for improvement, and Preventative Safety Observations and Inspections of Equipment and Facilities are carried out in order to identify potential hazardous behaviour or conditions.

¹⁷ For the purposes of this report, Near Misses correspond to those abnormal events that occur abruptly and unexpectedly, interrupting the normal course of work, and which, but for simple chance or if they had been identified and managed in time, would foreseeably have caused injuries or damage to the facilities.

¹⁸ Based on “Bird’s Pyramid” or accident theory (Frank E. Bird, 1969).

The table of quantitative indicators for Health and Safety is shown below:

Occupational injuries or illnesses	2022			2021		
	Spain	United Kingdom	United States	Spain	United Kingdom	United States
Number of deaths resulting from an occupational accident injury	0	0	0	0	0	0
Rate of deaths resulting from an occupational accident injury	0	0	0	0	0	0
Number of occupational injuries with major consequences (excluding fatalities)	0	0	0	0	0	2
Rate of occupational injuries with major consequences (excluding fatalities)	0	0	0	0	0	1
Number of occupational injuries	25	4	14	32	4	31
Rate of registered occupational injuries	26*	3	7	33*	3	16

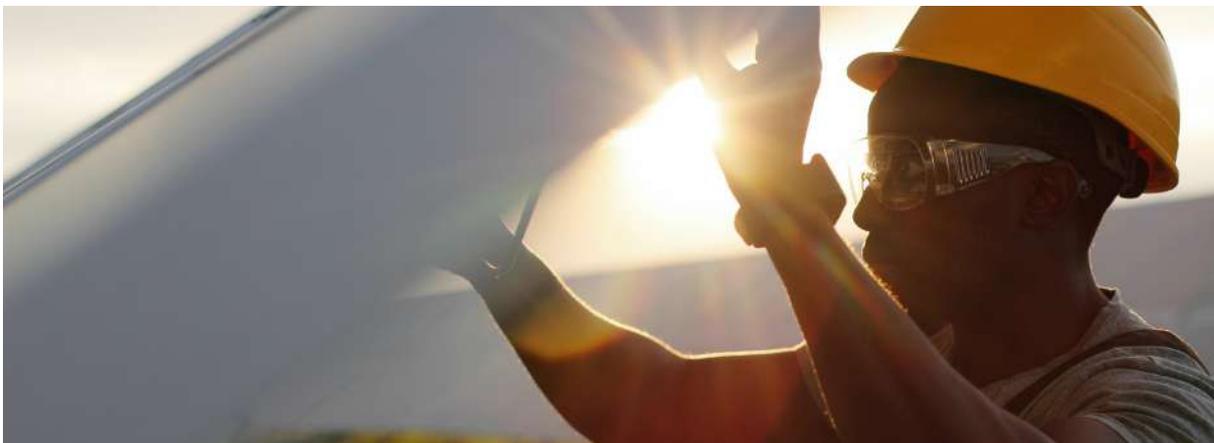
Work-related injury fatality rate = (number of fatalities resulting from work-related injury/number of hours worked) x10⁶.

Major industrial accident injury rate not including fatalities = (Number of major industrial accident injuries not including fatalities/number of hours worked) x10⁶.

Registered occupational injury rate = (Number of registered occupational injuries/number of hours worked) x10⁶. In Spain and the UK, registered accidents are assimilated to lost time accidents.

*In the denominator of the rates, the theoretical hours per contract have been used.

The main occupational injuries include: contusions, cuts, lacerations, muscle injuries, fractures and abrasions.



5.5. SOCIAL RELATIONS

Social dialogue at Tradebe is structured on the basis of local legislation in the different territories in which it operates:

- In Spain, 96% of employees are covered by collective bargaining agreements where social dialogue is carried out through the Legal Representation of Workers in each company, which takes the form of Workers' Delegates or Works Committees.
- In the United States, Tradebe works with the unions under 5 different labour contracts. Tradebe negotiates each labour contract with the different unions, with its own rules and agreements. In general, labour contracts are negotiated for a period of 3 years, but this can change if both parties agree. Additional negotiations can also take place if specific issues need to be covered.

Each labour contract has its own rules regarding the payment of membership fees. Three of them require employees to pay membership fees, while for the remaining two the payment of membership fees is voluntary.

- In Italy, social dialogue takes place at two levels: industrial (the most important) and company level, or district level in some cases. In the case of Tradebe, only the agreement at industry level, called "Contratto Collettivo Nazionale Lavoro", (National Collective Labour Agreement) applies. This agreement is negotiated between the Federchimica employers' association and the national trade unions.

The Federation of Chemical Industry Companies (FEDERCHIMICA, FARMAINDUSTRIA) negotiates with the trade unions on the general conditions of the collective bargaining agreement within 3-4 years. The current agreement applies to 2022 - 2025. These conditions apply to all of Tradebe's employees. Negotiations in the company are carried out by the work councils with the support of a trade union representative.

- The social dialogue in the UK and Germany is slightly different. In Germany, collective bargaining does not apply, whereas in the UK there are no collective bargaining agreements but there is a trade union at the Scotoil plant, and there are employees at other plants (Inutec and Fawley) who are union members.

5.6. TRAINING

Tradebe's culture establishes training as a key element in helping its employees achieve their full potential. In this context, the organisation invests a great deal of resources in the professional development of its employees.

It is considered that the only irreplaceable capital of the organisation is the knowledge and skills of its employees that translate into customer service, results and growth of the group.

Since knowledge grows when it is shared, in addition to training people and improving their skills, Tradebe seeks to develop knowledge creation contexts that seek continuous improvement and innovation through the acquisition of new knowledge and the dissemination of existing knowledge.

Tradebe seeks to develop training aimed at maintaining and improving the skills of its professionals, with the ultimate goal of increasing the quality of services offered, improving results and developing a team committed to the values of the company.

Tradebe needs to maintain and develop its quality and be aware that this can only be achieved in the right learning and knowledge management context. It is essential not only to have the right people, but also to be able to train them and develop the professional skills necessary to respond quickly to the needs that arise.

Training policies are understood as the set of organisational guidelines and procedures that organise and give coherence to the training actions required to meet these needs.

Training contributes substantially to the development of the group and to creating an environment that stimulates innovation, a key factor for the future. In 2022, Tradebe provided 34,792 hours of training to its employees (37,570 hours in 2021) in health and safety, languages and professional skills.

The distribution of training hours by gender, content and professional category is as follows:

HOURS OF TRAINING BY GENDER AND CONTENT

	2022			2021		
	F	M	Total	F	M	Total
EXTERNAL TRAINING	7.528	13.192	20.720	8.424	13.297	21.720
Health and Safety	922	5.662	6.583	215	1.774	1.989
Languages	4.305	3.893	8.198	6.487	4.750	11.237
Professional	489	939	1.428	627	3.108	3.735
Social Skills	720	1.496	2.216	81	1.802	1.883
Technical training	1.093	1.202	2.295	1.014	1.864	2.877
INTERNAL TRAINING	2.354	11.718	14.072	3.064	12.786	15.850
Health and Safety	2.354	11.718	14.072	2.431	11.108	13.539
Professional	0	0	0	10	15	25
Social Skills	0	0	0	607	1.493	2.101
Technical training	0	0	0	15	170	185
Total	9.882	24.909	34.792	11.488	26.083	37.570

HOURS OF TRAINING BY SUBJECT AND PROFESSIONAL CATEGORY

	2022					
	Health and Safety	Languages	Professional	Social Skills	Technical training	Total
Management	85	410	0	10	136	641
Middle management	3.403	3.725	188	1.117	382	8.815
Professionals	1.550	1.965	336	266	691	4.808
Technicians	4.503	868	41	434	349	6.195
Administration	1.260	1.020	56	123	245	2.704
Production	9.854	210	807	266	493	11.629
Total	20.655	8.198	1.428	2.216	2.295	34.792
	2021					
	Health and Safety	Languages	Professional	Social Skills	Technical training	Total
Management	218	632	16	100	189	1.155
Middle management	3.771	4.022	557	1.300	800	10.450
Professionals	762	3.508	214	1.966	346	6.796
Technicians	2.980	1.102	128	197	276	4.683
Administration	1.408	899	45	248	264	2.864
Production	6.389	1.074	2.800	172	1.187	11.623
Total	15.528	11.237	3.760	3.983	3.062	37.570

5.7. UNIVERSAL ACCESSIBILITY FOR PEOPLE WITH DISABILITIES

On the fundamental basis of equal opportunity, Tradebe is committed to ensuring, to the extent required by law, a workplace free from discrimination on the grounds of age, race, nationality, ethnicity, gender, religion or belief, sexual orientation or disability.

There is also a firm commitment to ensure full accessibility for people with disabilities, although in some cases, due to the characteristics of the industry in which it operates, universal accessibility is not always possible.

5.8. EQUALITY

As reflected in its Code of Ethics, Tradebe is committed to establishing an effective policy of equal opportunities for all its members to develop their business based on the principle of merit. Selection and promotion decisions are always based on objective assessments.

Tradebe is strongly committed to promoting a work environment that is free from any type of harassment, whether it is sexual, racial, religious, racial, national origin, gender, sexual orientation or identity, age, disability or any other inappropriate or unlawful action. Harassment of any kind is prohibited in the organisation, whether it is physical, verbal or non-verbal. Any indication of harassment is investigated and results in disciplinary action or dismissal if proven.

Tradebe’s equality policies and plans are designed to implement the organisation’s commitment to equal opportunities. Each employee has a responsibility to ensure that they conduct themselves according to the expected standards and reflect the commitments set out in these plans and policies.

The Code of Ethics and its underlying equality policy has been extended to all of Tradebe’s locations, adapted in each case to local legislation.

Individual talent is the only thing that counts in determining whether a candidate is suitable for a particular position, without exception. It is through equal opportunities and support for all employees that we attract and develop employees with the right characteristics, regardless of gender.

Specific equality and anti-discrimination policies exist within the group, as well as a specific procedure to ensure that the organisation deals with issues related to these matters confidentially and in the shortest possible time.

CASE STUDY | INTERNATIONAL WOMEN’S DAY TRADEBE

International Women’s Day is celebrated around the world on 8 March to fight for the equality, participation, and empowerment of women in all areas of society. Tradebe celebrated this day in a very special way: a symbolic tribute was organised, and a special T-shirt was designed to be worn on 8 March, as a way of recognition and vindication.

In addition, a yoga and meditation session with a coach was organised at the Sant Joan Despí offices, which gave participants the chance to get some fresh air and renew their bodies and minds. The session was open to both women and men.

A special tribute was also paid, through personal interviews, to different women in the company, highlighting their professional experience in the industrial sector.





5.9. EMPLOYEE STATISTICS AS AT 31 DECEMBER 2022¹⁹

DISTRIBUTION OF STAFF BY COUNTRY

	2022	2022 (%)	2021	2021 (%)
United States	860	32%	844	35%
United Kingdom	855	32%	842	35%
Spain and France	923	34%	689	28%
Italy	35	1%	27	1%
Germany	21	1%	21	1%
Total	2.694	100%	2.423	100%

DISTRIBUTION OF STAFF BY AGE

	2022	2022 (%)	2021	2021 (%)
<30	384	14%	325	13%
30-39	613	23%	571	24%
40-50	704	26%	717	30%
>50	993	37%	810	33%
Total	2.694	100%	2.423	100%

¹⁹ Considering all employees as at 31 December 2022, including trainees. No annual average is reported as the variation between the total number of employees at the end of the financial year and the number of employees as an annual average is not significant, and the company's activity is not subject to seasonality and turnover.

DISTRIBUTION OF STAFF BY GENDER AND PROFESSIONAL CATEGORY

	2022				2021			
	F (%)	M (%)	Total		F (%)	M (%)	Total	
Management	25%	75%	56	2%	18%	82%	49	2%
Middle management	28%	72%	478	18%	22%	78%	487	20%
Professionals	45%	55%	224	8%	48%	52%	187	8%
Technicians	30%	70%	473	18%	23%	77%	371	15%
Administration	81%	19%	289	11%	77%	23%	281	12%
Production	7%	93%	1.174	44%	6%	94%	1.048	43%
Total	26%	74%	2.694	100%	23%	77%	2.423	100%

DISTRIBUTION OF STAFF BY AGE AND PROFESSIONAL CATEGORY

	2022					2021				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Management	0%	4%	52%	45%	56	0%	4%	55%	41%	49
Middle management	6%	22%	35%	38%	478	7%	20%	37%	37%	487
Professionals	26%	27%	23%	24%	224	13%	28%	28%	31%	187
Technicians	25%	20%	18%	38%	473	28%	27%	19%	26%	371
Administration	9%	24%	27%	40%	289	10%	24%	31%	35%	281
Production	13%	24%	25%	37%	1.174	13%	24%	29%	34%	1.048
Total	14%	23%	26%	37%	2.694	13%	24%	31%	30%	2.423

NUMBER OF EMPLOYEES BY PROFESSIONAL CATEGORY, TYPE OF WORKING DAY, TYPE OF CONTRACT AND AGE

	2022				2021			
	Indefinite	Temporary	Scholarship / Internship	Total	Indefinite	Temporary	Scholarship / Internship	Total
<30	346	23	15	384	294	22	9	325
Women	93	10	8	111	73	6	3	82
Men	253	13	7	273	221	16	6	243
30-39	604	8	1	613	551	18	2	571
Women	150	2	0	152	143	7	2	152
Men	454	6	1	461	408	11	0	419
40-50	695	9	0	704	702	15	0	717
Women	175	3	0	178	172	5	0	177
Men	520	6	0	526	530	10	0	540
>50	976	16	1	993	795	15	0	810
Women	258	2	0	260	154	2	0	156
Men	718	14	1	733	641	13	0	654
TOTAL	2.621	56	17	2.694	2.342	70	11	2.423
Women	676	17	8	701	542	20	5	567
Men	1.945	39	9	1.993	1.800	50	6	1.856

DISTRIBUTION OF STAFF BY PROFESSIONAL CATEGORY AND TYPE OF WORKING DAY

	2022			2021		
	Full-time	Part-time	Total	Full-time	Part-time	Total
Management	55	1	56	49	0	49
Middle management	471	7	478	480	7	487
Professionals	214	10	224	174	13	187
Technicians	452	21	473	355	16	371
Administration	255	34	289	244	37	281
Production	1.156	18	1.174	1.027	21	1.048
Total	2.603	91	2.694	2.329	94	2.423
Total (%)	97%	3%		96%	4%	

NUMBER OF DISMISSALS BY GENDER AND AGE

	2022					2021				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Women	19	22	17	13	71	22	24	17	10	73
Men	64	52	48	57	221	45	56	49	57	207
Total	83	74	65	70	292	67	80	66	67	280

NUMBER OF DISMISSALS BY COUNTRY AND GENDER

	2022			2021		
	Women	Men	Total	Women	Men	Total
United States	19	86	105	14	99	113
United Kingdom	22	58	80	9	39	48
Europe	30	77	107	50	68	118

NUMBER OF DISMISSALS BY PROFESSIONAL CATEGORY

	2022			2021		
	Women	Men	Total	Women	Men	Total
Management	1	2	3	2	0	2
Middle management	9	28	37	5	39	44
Professionals	9	11	20	11	5	16
Technicians	5	30	35	21	31	52
Administration	33	8	41	16	4	20
Production	14	142	156	18	128	146
Total	71	221	292	73	207	280

AVERAGE REMUNERATION BY PROFESSIONAL CATEGORY AND AGE - EUROPE (GERMANY, FRANCE, SPAIN AND ITALY)(€/year)

	2022					2021				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Middle management	28.158	54.774	58.287	61.414	57.866	20.545	53.505	54.066	62.934	55.287
Women	24.100	50.369	47.994	51.667	48.434	15.000	42.244	49.068	44.894	46.099
Men	34.244	57.197	64.577	65.720	63.002	21.654	60.671	56.565	65.940	58.733
Wage gap(W:M) (*)	70%	88%	74%	79%	77%	69%	70%	87%	68%	78%
Professionals	22.591	38.821	38.572	50.686	35.858	23.343	40.679	42.089	48.463	39.741
Women	21.151	36.618	33.757	56.814	33.123	26.420	38.329	42.961	47.062	38.918
Men	24.301	41.170	40.853	47.387	38.073	15.650	42.668	41.107	51.265	40.695
Wage gap(W:M) (*)	87%	89%	83%	120%	87%	169%	90%	105%	92%	96%
Technicians	18.402	26.489	33.711	43.102	34.973	19.735	25.862	36.115	42.845	30.322
Women	19.246	24.104	31.161	46.965	36.666	18.703	25.265	28.129	30.096	25.273
Men	17.277	28.120	35.445	38.637	33.331	20.767	26.586	41.439	50.813	34.810
Wage gap(W:M) (*)	111%	86%	88%	122%	110%	90%	95%	68%	59%	73%
Administration	25.712	24.185	26.657	27.620	26.408	14.855	22.456	24.808	28.826	23.869
Women	21.010	24.637	26.892	29.319	27.117	18.963	21.586	24.991	28.826	24.812
Men	30.415	22.829	24.600	18.783	22.955	14.170	24.318	22.735	0	20.216
Wage gap(W:M) (*)	69%	108%	109%	n/a	118%	134%	89%	110%	n/a	123%
Production	21.360	24.025	25.791	25.315	25.032	21.255	23.394	25.267	25.911	24.649
Women	8.320	24.617	39.023	22.148	22.315	19.733	22.548	30.023	19.589	22.816
Men	22.128	24.017	25.684	26.003	25.287	21.635	23.475	25.053	26.367	24.795
Wage gap(W:M) (*)	38%	102%	152%	85%	88%	91%	96%	120%	74%	92%

AVERAGE REMUNERATION BY PROFESSIONAL CATEGORY AND AGE - UNITED KINGDOM (£/year)

	2022					2021				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Middle management	35.773	53.249	58.935	63.437	57.842	42.619	51.698	52.446	60.662	55.936
Women	30.763	53.415	58.118	63.604	55.903	0	58.092	56.251	67.514	59.166
Men	37.443	53.155	59.257	63.409	58.464	42.619	47.588	51.139	60.016	55.136
Wage gap(W:M) (*)	82%	100%	98%	100%	96%	0%	122%	110%	112%	107%
Professionals	38.948	43.014	53.315	55.126	49.501	35.523	46.680	52.933	54.065	51.149
Women	40.345	33.075	50.454	47.683	44.323	35.382	43.182	52.001	45.640	45.573
Men	38.150	49.641	54.746	60.278	52.666	35.875	50.178	53.515	59.120	55.246
Wage gap(W:M) (*)	106%	67%	92%	79%	84%	99%	86%	97%	77%	82%
Technicians	29.529	33.783	33.810	34.015	31.934	27.546	32.369	34.969	34.036	31.290
Women	29.245	39.533	31.616	35.370	32.416	27.432	32.347	27.362	32.679	29.460
Men	29.607	33.144	34.541	33.338	31.796	27.580	32.377	37.143	34.178	31.787
Wage gap(W:M) (*)	99%	119%	92%	106%	102%	99%	100%	74%	96%	93%
Administration	24.157	26.133	26.555	25.120	25.522	22.568	25.506	25.000	24.335	24.532
Women	24.183	25.175	27.602	24.818	25.086	22.206	25.294	23.840	23.788	23.932
Men	24.000	27.837	25.509	26.327	26.639	23.110	25.788	26.159	26.125	25.677
Wage gap(W:M) (*)	101%	90%	108%	94%	94%	96%	98%	91%	91%	93%
Production	25.984	26.939	29.375	28.630	27.955	25.013	26.558	27.388	27.333	26.853
Women	26.814	26.904	28.673	24.986	26.849	24.558	24.320	25.456	24.651	24.619
Men	25.882	26.942	29.426	28.768	28.033	25.056	26.760	27.453	27.429	26.976
Wage gap(W:M) (*)	104%	100%	97%	87%	96%	98%	91%	93%	90%	91%

(*) In all cases, the pay gap is calculated as: (average female pay/average male pay) x100.

AVERAGE SALARY BY PROFESSIONAL CATEGORY AND AGE - UNITED STATES (\$/año)

	2022					2021				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Middle management	84.222	95.079	110.913	119.166	108.367	54.663	71.172	97.582	101.306	87.723
Women	87.741	90.649	96.306	104.700	94.983	55.989	64.219	86.628	81.804	74.518
Men	80.703	97.294	114.990	121.521	112.513	54.147	73.490	100.889	104.460	91.224
Wage gap(W:M) (*)	109%	93%	84%	86%	84%	103%	87%	86%	78%	82%
Professionals	60.258	74.768	96.388	98.654	80.258	57.870	78.535	83.142	94.209	78.582
Women	59.598	62.846	99.820	87.254	75.179	62.362	69.697	92.597	84.546	76.352
Men	61.181	82.716	90.668	114.613	85.743	52.480	85.410	75.578	113.535	81.005
Wage gap(W:M) (*)	97%	76%	110%	76%	88%	119%	82%	123%	74%	94%
Technicians	52.445	60.527	63.267	73.064	63.561	44.296	53.445	58.206	70.750	57.655
Women	45.636	56.410	61.073	87.366	56.359	44.075	53.985	56.663	93.737	54.366
Men	54.047	60.972	63.816	72.595	64.462	44.367	53.391	58.398	69.601	58.105
Wage gap(W:M) (*)	84%	93%	96%	120%	87%	99%	101%	97%	135%	94%
Administration	42.263	45.569	46.447	48.815	46.699	36.385	40.943	42.534	45.984	42.877
Women	42.457	43.837	45.762	45.834	44.985	35.344	38.376	41.481	41.816	40.296
Men	41.100	52.494	55.361	65.424	57.085	45.760	51.211	52.709	62.658	56.542
Wage gap(W:M) (*)	103%	84%	83%	70%	79%	77%	75%	79%	67%	71%
Production	42.969	47.407	49.612	51.261	48.077	40.426	46.199	47.620	50.447	46.807
Women	42.905	40.617	46.176	43.618	42.388	45.126	37.529	37.835	0	38.966
Men	42.976	47.997	49.695	51.414	48.409	40.222	47.263	47.904	50.447	47.151
Wage gap(W:M) (*)	100%	85%	93%	85%	88%	112%	79%	79%	0%	83%

(*) In all cases, the pay gap is calculated as: (average female pay/average male pay) x100.

AVERAGE MANAGEMENT REMUNERATION

	2022			2021		
	Women	Men	Total	Women	Men	Total
Europe (€)	117.650	144.181	135.623	125.502	141.621	138.117
United Kingdom (£)	108.750	159.015	154.826	96.250	150.421	145.496
United States (\$)	424.133	282.798	315.414	214.250	298.272	281.467

At the end 2022, there were 53 employees with declared disability (compared to 49 employees at the end of 2021).



**HUMAN
RIGHTS**

Tradebe has a firm commitment and obligation to ensure the respect for human rights in all aspects and in all areas of the organisation. This principle is considered to be of fundamental compliance and has therefore been considered as a material issue of the Sustainability Report.

6.1. MANAGEMENT APPROACH

Tradebe is committed to transparency in the way it obtains and manages information from its employees and stakeholders and complies with all requirements set out by data protection laws.

Tradebe follows the United Nations Global Compact with regard to respect for human rights. As stated in the Code of Ethics, all of Tradebe's activities are conducted with respect for Human Rights and civil liberties, in accordance with internationally accepted laws and practices.

Tradebe adheres to the Universal Declaration of Human Rights, the core labour conventions of the International Labour Organisation (ILO) and the OECD guidelines for multinational companies among others.

Tradebe takes measures to ensure compliance with the labour standards contained in the ILO core conventions, and will not tolerate contrary practices, from those companies that make up the group or those that collaborate with it.

Furthermore, Tradebe will at all times ensure strict compliance with labour regulations and will therefore only hire those persons who are legally authorised.

As a result of the equality policies and the application of the Code of Ethics, Tradebe has an inclusive culture. There is no evidence of non-compliance in relation to respect for human rights, either by its employees or in its supply chain. These policies are aimed at mitigating the following risks:

- Failure to respect human rights, in any form.
- Non-compliance with regulations concerning slavery and respect for human rights.

The organisation ensures that these risks are controlled and mitigated through the described policies and specific training. The policies are regularly reviewed by the Management Committee.

Although the risks associated with slavery and human trafficking are very low or non-existent in Tradebe's business, there is a legal requirement in the UK for suppliers to be assessed in this regard and to comply with the principles set out in the UK's Modern Slavery Act 2015. The latest published report states that Tradebe is fully aware of its responsibilities under the Modern Slavery Act 2015 and is committed to its role in combatting this global problem. For this purpose, robust practices are in place to combat slavery and human trafficking both in the organisation's operations and throughout its supply chain.

6.2. IMPLEMENTATION HUMAN RIGHTS DUE DILIGENCE PROCEDURES

Policies, procedures and measures to prevent and manage potential Human Rights violations are managed and promoted by the Human Resources area in coordination with the Executive Committee and the Compliance and Business Ethics Committee, and in all cases are made up of qualified staff.

The Human Resources team works closely with operations and business managers and provides them with the tools and leadership to manage human rights issues and ensure compliance with local legislation.

As at the date of the current report, no reports of non-compliance with human rights legislation have been received, and no non-compliance has been detected through internal control mechanisms.





COMBATTING CORRUPTION AND BRIBERY

7.1. MANAGEMENT APPROACH

Tradebe has a firm commitment and obligation to fight corruption and bribery in all aspects and in all areas of the organisation. This principle is considered to be of fundamental importance and has therefore been considered as a material issue of the Sustainability Report.

The organisation has a channel for reporting irregularities and legal breaches (whistleblowing channel). There were no known complaints in 2022 (and none were received in 2021).

7.2. GROUP POLICIES ON ANTI-CORRUPTION AND BRIBERY

Within the group, three main areas of action can be distinguished with regard to anti-corruption and anti-bribery policies:

CODE OF ETHICS AND INTERNAL POLICIES

Tradebe's commitment to strict compliance with regulations on the prevention of and fight against corruption, bribery and any other matter adjacent or linked to the above is clear and unequivocal, applying at all times a zero-tolerance criterion with respect to non-compliance. The ultimate goal of the organisation is the development and constant improvement of the guiding principles set out in the group's Code of Ethics in these and other matters.

In this regard, the aforementioned Code of Ethics, which every employee receives on joining any of the group's companies, sets out a system for resolving problems in the event of any legal breach, providing the employee with guidelines for action and indicating how and to whom they should report the incident detected. Emphasis is also placed on the relationship with our business partners, suppliers and customers, trying to involve them in our good practices and setting out a clear policy of not accepting or offering them gifts or items that could be considered a bribe, as well as not using such gifts or items as a means of gaining the acceptance of a vendor, closing a business deal or obtaining any other type of undue advantage.

In addition, there are specific internal policies that have an impact on and further develop the ideas contained in the Code of Ethics and in the United Kingdom online training programmes have been implemented for those employees who, due to their position, are particularly exposed to this type of proceedings.

CRIMINAL COMPLIANCE

The group works on the implementation, review and continuous improvement of the criminal responsibility or compliance programme, which aims to monitor, control, supervise, detect and prevent certain criminal offences, including bribery, influence peddling, scams, fraud and money laundering.

The group has made progress and significant steps have been taken towards the development of the current Compliance system, which includes, among others, the existence of a protocol for managing the whistleblowing and internal investigations channel in order to uncover offences committed by employees, managers and/or partners and, where appropriate, to become aware of and sanction any infractions that may occur, so that any employee can bring such circumstances to the attention of the group's Ethics Committee and they can take the appropriate action.

7.3. POLICY OUTCOMES

The results of the group's policies on bribery and corruption are entirely satisfactory so far, with no reportable incidents detected during 2022.

7.4. RISKS

The range of corruption and bribery risks faced by the group is varied and includes, amongst others, facilitation payments and bribery in all its forms, money laundering, conflicts of interest, distortion of market competition, financing of political parties and/or their candidates or influence peddling. The consequences of engaging in these malpractices are mainly financial (sanctions) and reputational.

Due to the volume of agreements with the public sector in which the different companies of the group participate, relations with the public administration sector present the greatest risk factor for the group in terms of bribery and corruption.

To mitigate this risk, a hierarchical approval chain or workflow is set out for purchases and sales, which is monitored by the legal departments of the respective countries at all times. Cash payments are not accepted or used to make any purchases.

7.5. MEASURES TAKEN TO PREVENT CORRUPTION AND BRIBERY

As indicated in 7.1, the group has worked at three different levels to prevent corruption and bribery in all its forms:

- a) Implementation of a comprehensive corporate criminal responsibility or compliance programme
- b) Creation of a set of guidelines and directives on these matters in the Code of Ethics, developed by specific internal policies and complemented by online training programmes
- c) Appointment of independent advisers to mitigate the potential opportunism of other directors or the controlling partners of the group's parent company

7.6. MEASURES TO COMBAT MONEY LAUNDERING

In addition to strict compliance with the regulations on money laundering in each country where the group is present, prevention focuses mainly on avoiding cash transactions in both purchases and sales, and on rigorous monitoring of suspicious transactions, always with the assistance of the legal departments.

No money laundering cases were detected in 2022.

7.7. CONTRIBUTIONS TO FOUNDATIONS AND NON-PROFIT ORGANITIONS

Tradebe works on and promotes different solidarity initiatives:

- **Charity donation of computer equipment:** Tradebe has donated 67 laptops, 29 tower computers, 11 keyboards and ten screens to the NGO Noves Tecnologies per Àfrica (New Technologies for Africa). This NGO is responsible for sending computers to African countries to provide mainly schools with the equipment children need to avoid exclusion from technological progress. The equipment will go to a project in the Democratic Republic of Congo, specifically to a school built by a Congolese foundation called FODAK with which the organisation has already collaborated on other occasions.
- **Christmas Jumper Day:** in December a charity breakfast is organised at several of the group's headquarters (including the head office in Sant Joan Despí), with the proceeds going to the NGO, Save the Children.
- **Donation to the Spanish Bosquia Foundation:** To celebrate "World Environment Day", which took place on 5 June 2022, Tradebe organised the "I care for the planet" contest, an initiative to collect, share and reward the individual initiatives that Tradebe employees promote to make the planet a more sustainable place. For each idea contributed, Tradebe donated €1 for the reforestation of forests to the Spanish Bosquia Foundation, effectively contributing to

the care and conservation of the environment. Thanks to all the contributions, we managed to plant a tree in the forest of San Bartolomé de la Torre in Huelva.

- **Tradebe Hinckley (UK) joined the '2,000 Squats Challenge' to raise funds for charity:** In September 2022, the Tradebe Hinckley team took part in the 'September 2000 Squats Challenge' in aid of the Great Ormond Street Hospital Children's Charity, a hospital that receives around 600 sick children from all over the UK every day. With a total of 3,000 squats, the team raised £200.
- **Christmas solidarity campaign:** Tradebe joined the initiative to show its commitment to solidarity and doubled each of the donations that were collected with no limit. This year, we collaborated with the Spanish Association Against Cancer, a non-profit organisation that works to help cancer patients and fight the disease on all fronts. As a result of all the donations, €1,430 was raised. In total, €2,860 was donated to the Spanish Cancer Association.

7.8. MEMBERSHIP OF SECTORAL ASSOCIATIONS

Tradebe is a member of the following industry associations:

- Environmental Services Association (2022 membership fee: £12,500)
- Asociación de Empresas Gestoras de Residuos y Recursos Especiales (ASEGRE) (2022 membership fee: €6,867)
- Associació Catalana d'Instal·lacions de Tractament de Residus Especials (ACITRE) (2022 membership fee: €6,000)
- ACLIMA, a benchmark and umbrella organisation for the eco-industry and environmental services and products in the Basque Country (2022 membership fee: €3,758.26).
- National Association of MARPOL Agents (ANAM) (2022 membership fee: €11,536)
- Catalan Chemical Sector Business Federation (FEDEQUIM) (2022 membership fee: €2.734)
- Euroshore (2022 membership fee: €3,000)
- Gremi de Recuperació de Catalunya (2022 membership fee: €1,290)
- Spanish Recovery Federation (2022 membership fee: €3,277)
- Comisión Autónoma de Seguridad e Higiene en el Trabajo de Industrias Químicas y Afines (COASHIQ) (2022 membership fee: €1,068)
- PRL Innovacion (2022 membership fee: €550)
- International Marine Contractors Association (2022 membership fee: €3,850)



8

SOCIETY

8.1. MANAGEMENT APPROACH

Tradebe is strongly committed to sustainable development and takes its own social issues into consideration as well as those of its customers and suppliers. These principles are considered to be of fundamental importance and have therefore been considered as a material issue of the Non-Financial Information Statement.

8.2. COMMITMENT TO SUSTAINABLE DEVELOPMENT

Due to the existing regulatory framework in the sector, the risks of compromising local development are considered low. However, the risk of an environmental incident occurring can never be ruled out and Tradebe invests significant resources to monitor and mitigate these risks, as explained in the section on environmental issues.

At Tradebe Spain, following RD56/2016 on energy audits, audits are carried out every four years, detailing actions to improve the consumption and efficiency of the facilities.

The organisation's commitment to the development of society has been particularly evident during the COVID-19 pandemic, during which Tradebe has continued to provide essential services, ensuring the health of its customers and the business it serves.

8.3. SUBCONTRACTING AND SUPPLIERS

Purchases related to production are made in compliance with legal requirements and good industry practices, including respect for human rights, gender equality and the environment, in accordance with the sector's own regulations.

Our relationship with our suppliers is based on the principles of loyalty, transparency and reciprocal collaboration. In this regard, Tradebe strives to ensure that contractors and suppliers promote and respect ethical values, such as sustainable development, human rights, labour regulations and environmental protection.

It is prohibited to promote or authorise the promotion of one supplier over another in order to obtain an undue advantage. All decisions must be technically and economically substantiated, and must not permit favouritism of any kind. As indicated in the Code of Ethics, quality, price, ethics, integrity, compliance and experience are the only selection criteria applicable to these relationships.

Within the framework of the Integrated Management System and ISO certifications, Tradebe has established supplier selection and evaluation procedures that are regularly audited. In this context, the requirements to be met by suppliers who wish to work with Tradebe and the evaluation criteria, which include quality, price and response time amongst others, are established.

Environmental issues are also part of the organisation's purchasing policy. For example, in the company car policy there is a CO₂ emission limitation which prevents buying or leasing vehicles that exceed 160g of CO₂.

For more than three years, electricity tenders have only been open to providers who guarantee that the energy purchased comes from renewable sources and include certificates of origin.

8.4. COSTUMERS

Although it does not deal with the end consumer, Tradebe's business revolves around protecting the health and safety of its customers and, indirectly, the end consumer.

Customer service is a value of the organisation. All ISO 9001 quality certifications ensure maximum satisfaction, meeting your requirements and expectations.

At Tradebe we are committed to complying with free competition and antitrust regulations, avoiding any practice that limits or restricts them. We are also committed to carrying out our activities in an honest and ethical manner.

We take care to provide truthful information in Tradebe's promotional and advertising activities, and we do not allow misleading false information to be given to our customers.

Tradebe categorically rejects any type of misleading advertising, offering, receiving, soliciting or accepting an unjustified benefit or advantage of any nature in commercial relations and any practice of attempting to alter the prices that would result from the free competition of products, services and goods.

Tradebe is committed to the quality of its services and provides its members with the necessary means to develop the most appropriate quality management systems.

8.5.

IMPACT OF THE BUSINESS ON LOCAL POPULATIONS AND THE TERRITORY

Tradebe's business, through the direct and indirect hiring of people, the services provided and received, promotes the local economies of the territories where we develop our business.

We are committed to promoting local training projects, collaborating with academic training programmes for students and we encourage dialogue with local communities, acting with the utmost respect for the environment and those around us.

We demonstrate maximum respect towards the community of people who live in the territories where we work, and we ensure that we maintain the greatest commitment to the environment wherever we operate. For this reason, Tradebe has internal regulations on environmental risk management that it applies meticulously in the development of its activities in order to foresee, avoid and minimise the alteration of the environment.

The following is an example of Tradebe's collaboration with local entities:

TRADEBE JOINS THE INITIATIVE FOR THE CONSERVATION OF THE LLOBREGAT DELTA NATURAL AREA IN CONJUNCTION WITH THE PORT COMMUNITY OF BARCELONA

To celebrate World Environment Day on 5 June 2022, the Port Community of Barcelona organised a volunteer campaign to carry out the conservation of the Can Camins pine forest. The activity consisted of removing invasive exotic vegetation, thus contributing to the preservation and conservation of the natural space of the Llobregat delta.

A total of 20 port companies, some of which have EMAS certification and others ISO 14001, as well as the Port Authority of Barcelona, joined this initiative, promoted by the Environment working group of the Port Community Governing Council.



Tradebe wanted to actively collaborate in the environmental initiative and provided breakfast for the volunteers so that they could regain their energy and continue with the vegetation removal tasks.

TRADEBE PRESENT AT THE XVI IQS EMPLOYMENT FORUM

IQS University in Barcelona organises an annual Employment Forum, the main objective of which is to facilitate interprofessional relations between all students and different business organisations. This forum gives IQS students access to a wide variety of companies in a wide range of sectors.



Tradebe participated in the XVI IQS Employment Forum held on 9 March. Part of the Human Resources and Communication team from Spain had the opportunity to introduce Tradebe to all those students who came to our stand.

The IQS Career Service is responsible for accompanying its students on this path, from the preparation of their CV, group dynamics to the development of their communication skills, among other activities. The results following the forum indicate that up to 90% of graduates are hired within less than two months.

The day ended with a Tradebe presentation in the auditorium, which highlighted Tradebe's business to more students.

COMMITMENT AND RECOGNITION FOR TRADEBE INUTEC (UK)

As part of our commitment to the next generation of employees, Inutec is proud to have presented the Apprenticeship Award at a recent event at Bridgwater & Taunton College, as a token of appreciation to apprentices for their dedication, achievement and hard work.

In addition, some of our team members attended the recent UK Women in the Nuclear Industry Conference in Manchester. This was a great opportunity to exchange ideas with other professionals, participate in workshops and understand how women can lead positive change in our workplaces. Part of our ambition is to improve gender diversity in the industry.

Finally, Tradebe Inutec has also received the prestigious RoSPA Order of Distinction at its annual awards ceremony. This award recognises 19 consecutive golds, a true recognition of the sustained focus and hard work of the entire Tradebe Inutec team to incorporate health and safety into all aspects of their daily operations.

8.6. TAX INFORMATION

Tradebe upholds its commitment to economic, social and industrial development through rigorous compliance with current tax legislation in each territory in which it operates. Taxes generated by its operations are declared and settled with the relevant authorities.

The group has no operations in territories declared as tax havens. If there were any business operations with third parties domiciled in such territories, they would be carried out as in any other territory and as part of the group's normal operations.

Tradebe's tax policy is guided by the tax legislation in force in each territory, and any doubts in this regard or operations that could have a significant tax impact are previously consulted with independent tax advisers of recognised prestige.

Below is a summary (in thousands of euros) of the tax reporting aspects required by Law 11/2018 on non-financial reporting and diversity.

2022							
(Thousands of euros)	Spain	United States	United Kingdom	Italy	Germany	Consolidation adjustments	Total
Profit from continuing operations	20.403	-2.910	20.499	-311	2.543	-11.278	28.946
Operating subsidies included in profit or loss	184	-	-	-	8	-	192
Allocation of fixed asset subsidies	47	-	-	-	-	-	47

2021							
(Thousands of euros)	Spain	United States	United Kingdom	Italy	Germany	Consolidation adjustments	Total
Profit from continuing operations	12.548	3.954	9.474	-1.223	458	-4.428	20.783
Operating subsidies included in profit or loss	-	-	-	-	-	-	-
Allocation of fixed asset subsidies	-	-	-	-	-	-	-

In 2022, the group paid a total of €6 million (€3,318 million in 2021) in corporate income tax.

²⁰ Includes the settlement for the 2021 financial year and payments on account for the 2022 financial year.

ANNEX I

ENTITIES INCLUDED IN THE CONSOLIDATED FINANCIAL STATEMENTS

GTMA's scope of consolidation comprises the following companies:

EUROPE

SPAIN

- Grupo Tradebe Medio Ambiente, S.L. (Parent Company) (**GTMA**)
- Atlas Gestión Medioambiental, S.A.
- Biocompost de Lugo, S.L.
- Clinical Nutrition, S.A.U.
- Cosmos Aromática Internacional, S.A.
- Ecología Química, S.A.U. (**EQ**)
- Ecológica Ibérica y Mediterránea, S.A. (hereinafter, "Ecoimsa")
- Ecomarpol, S.L.U.
- Ecoproges, S.L.
- Edafo Gm, S.A.
- Enviland Medio Ambiente, S.L.U.
- Fragnor, S.L.
- Fundació Privada Tradebe
- Gestión de Marpol Galicia, S.L.
- Ignea Medioambiente, S.L.
- Ingeniería y Tratamientos de Valorización, S.L.U.
- Lima Farma, S.L.U.
- Limpiezas del Nervión, S.A.U.
- Limpiezas Marítimas y Portuarias, S.L.U.
- Lunagua, S.L.U.
- Magma Tratamientos, S.L.U.
- Marpogal AIE
- Mediaciones Comerciales Ambientales, S.L.
- Multidiet, S.A.U.
- Nutrisport, S.A.U.
- Port Ecorel, A.I.E.
- Prointraval, S.L.
- Radesant 17 Business, S.L.
- Sanemar, S.L.U.
- Tecnoambiente, S.L.U.
- Tradebe, S.A.U.
- Tradebe Chemicals Management, S.L.U. (formerly known as Tradebe Medioambiente Internacional, S.L.)
- Tradebe Gestión España, S.L.U.
- Tradebe Green Fuel Company, S.L.U.
- Tradebe Valdilecha, S.L.
- Tratamiento y Recuperaciones Industriales, S.A.
- Valorización Energética de Gas de Vertedero, S.L.

UNITED KINGDOM

- Avanti Environmental Group Limited
- Avanti Environmental Holding Limited
- Fourway Management Limited

- Hollywell Holdings Limited
- Inutec Limited
- Labwaste Limited
- Polkacrest Midlands Limited (inactive)
- Polkacrest Northwest Limited (inactive)
- Rechem Limited
- Scotoil Realisations Limited
- Scotoil Services Limited
- Scotoil Services (Middle East) Limited
- Tradebe Dinnington Limited
- Tradebe Environmental Services Limited (**TES Ltd**)
- Tradebe Fawley Limited
- Tradebe Fawley Midco Limited
- Tradebe Gwent Limited
- Tradebe Healthcare National Limited
- Tradebe Healthcare South West Limited
- Tradebe Healthcare (Holdings) Limited
- Tradebe Healthcare Limited
- Tradebe Heysham Limited (formerly known as Tradebe Chemicals Limited)
- Tradebe Management Limited
- Tradebe Minerals Recycling Limited
- Tradebe North West Limited
- Tradebe Refinery Services Limited
- Tradebe Solvent Recycling Limited
- Tradebe Uk Limited

FRANCE

- Tradebe Sarl
- Tradebe Solvants Services Sarl

PORTUGAL

- Pspe – Serviços Prestados Às Empresas (Unipessoal), Lda

GERMANY

- Tradebe GmbH

ITALY

- Tradebe Chimica Srl
- Tradebe Adro Srl

THE AMERICAS

UNITED STATES

- Aaron Oil Company, Llc, (formerly known as Aaron Oil Company, Inc.)

- International Hydrocarbon Sevices, Llc
- Norlite, Llc
- Tradebe Capital Corporation
- Tradebe Environmental Services, Llc
- Tradebe Industrial Services, Llc)
- Tradebe Transportation Llc
- Tradebe Treatment and Recycling Llc,
- Tradebe Treatment and Recycling Northeast, Llc
- Tradebe Treatment and Recycling of Baton Rouge, Llc, (formerly known as Redhawk Environmental Services, Llc)
- Tradebe Treatment and Recycling of Bridgeport, Llc
- Tradebe Treatment and Recycling of Nashville, Llc
- Tradebe Treatment and Recycling of Northborough, Llc
- Tradebe Treatment and Recycling of Stoughton, Llc
- Tradebe Treatment and Recycling of Tennessee, Llc
- Tradebe Treatment and Recycling of Wisconsin, Llc

COLOMBIA

- Tecnoambiente de Colombia, S.L. S.A.S.

ASIA

OMAN

- Tradebe Services LLC
- Worlwide Environmental Services LLC

And the joint ventures listed below, which have been included in the financial statements of each individual company:

- Acosta Ingeniería Marítima, S.L. y Tecnoambiente, S.L.U. Ute (Ute Acosta - Tecno)
- Ingeniería Creativa Pita, S.L. - Tecnoambiente, S.L.U. II
- Ingeniería y Tratamientos de Valorización, S.L.U. - M.J. Gruas (Depurpla II)
- Ingeniería y Tratamientos de Valorización, S.L.U. - M.J. Gruas (*Tárrega*)
- Ingeniería y Tratamientos de Valorización, S.L.U. - Disseny I Sostenibilitat - Construcciones Caler (Ute Vilanova)
- Mc Valnera SI – Tecnoambiente, S.L.U. - Sener Ing.y Sist. SI Ute (Ute Valnera-Tecno-Sener)
- Tecnoambiente, S.L.U. - Gisa (Malaga - 2)
- Tecnoambiente, S.L.U. – Aquatica (Ute Tecno-Aquatica)
- Tecnoambiente, S.L.U. – Mc Valnera S.L Ute (Ute Algeciras)
- Tecnoambiente, S.L.U. – Mc Valnera II S.L Ute (Ute Huelva)
- Tecnoambiente, S.L.U. – Mc Valnera III S.L Ute (Ute Tecno-Valnera III)
- Tecnoambiente, S.L.U. – Mc Valnera IV S.L Ute (Ute Tecno-Valnera IV)
- Tecnoambiente, S.L.U. – Mc Valnera V S.L Ute (Ute Tecno-Valnera V)
- Tecnoambiente, S.L.U. – Adc Serv Ambientales (Ute Dc Serv.Amb. -Tecno)
- Tecnoambiente, S.L.U. – Adc Serv Ambientales (Ute Dc Serv.Amb. -Tecno)
- Tradebe, S.A.U. - Botamavi - Urbaser (Marpolgal)
- Ute – Ecotri

ANEX II

TABLE OF CONTENTS OF THE LAW AND TAXONOMY

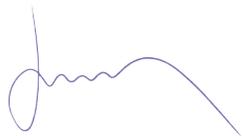
Information requested by Law 11/2018	Materiality	Paragraph of the report where a response is given	Reporting criterion (GRI 2021, unless otherwise stated)	Remarks/ reason for omission
GENERAL INFORMATION				
Description of the business model including its business environment, organisation and structure	Material	2.1. ORGANISATIONAL PROFILE	GRI 2-6 a)	Not applicable
Markets in which it operates	Material	2.1. ORGANISATIONAL PROFILE 2.2 BUSINESS ENVIRONMENT	GRI 2-1 GRI 2.6	Not applicable
Organisational objectives and strategies	Material	2.2 BUSINESS ENVIRONMENT	GRI 2-6	Not applicable
Main factors and trends that may affect its future development	Material	3.3. MAIN RISKS AND MITIGATING FACTORS	GRI 2-6	Not applicable
Reporting framework used	Material	1.1. INTRODUCTION	GRI 1	Not applicable
Principle of materiality	Material	1.2. MATERIALITY AND STAKEHOLDER ANALYSIS	GRI 3-1 GRI 3-2	Not applicable
ENVIRONMENT				
Environmental Management				
Management approach: Policies and risks	Material	4.1. MANAGEMENT APPROACH 4.2. GROUP POLICIES ON ENVIRONMENTAL ISSUES	GRI 3-3 GRI 2-23 a)	Not applicable
Current and foreseeable effects of the company's activities on the environment and, where appropriate, on health and safety.	Material	4.4. IMPACT OF THE GROUP'S ACTIVITY ON THE ENVIRONMENT	GRI 3-3	Not applicable
Environmental assessment or certification procedures	Material	4.2. GROUP POLICIES ON ENVIRONMENTAL ISSUES	GRI 3-3	Not applicable
Resources dedicated to environmental risk prevention	Material	4.1. MANAGEMENT APPROACH	GRI 3-3	Not applicable
Application of the precautionary principle	Material	4.5. PRECAUTIONARY PRINCIPLE	GRI 3-3 GRI 2-23 a)	Not applicable
Amount of provisions and guarantees for environmental risks	Material	4.6. PROVISIONS AND GUARANTEES	GRI 3-3	Not applicable
Pollution				
Measures to prevent, reduce or remedy emissions that seriously affect the environment, taking into account any activity-specific form of air pollution, including noise and light pollution	Material	4.9. CLIMATE CHANGE AND MANAGEMENT OF OTHER EMISSIONS	GRI 3-3	Not applicable
Circular economy and waste prevention				
Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste	Material	4.7. CIRCULAR ECONOMY AND WASTE MANAGEMENT 4.8. SUSTAINABLE USE OF RESOURCES	GRI 306-02 a) (V. GRI 2020) GRI 306-04 a) d) e) (GRI Version 2020) GRI 306-05 a) d) e) (GRI Version 2020)	Not applicable
Actions to combat food waste	Food waste is considered minimal or non-existent in Tradebe's business and is only associated with the personal consumption by the group's employees.	Not applicable	Not applicable	Not applicable
Sustainable use of resources				
Water consumption and water supply according to local limitations	Material	4.8. SUSTAINABLE USE OF RESOURCES	GRI 303-04 e) GRI 303-05 a) (V. GRI 2018)	Not applicable
Consumption of raw materials and measures taken to improve the efficiency of raw material use	Material	4.4. IMPACT OF THE GROUP'S ACTIVITY ON THE ENVIRONMENT 4.7. CIRCULAR ECONOMY AND WASTE MANAGEMENT 4.8. SUSTAINABLE USE OF RESOURCES	GRI 301-2 a) (GRI Version 2016)	Not applicable
Direct and indirect energy consumption	Material	4.8. SUSTAINABLE USE OF RESOURCES	GRI 302-01 a) b) c) i) d) i) e) (GRI Version 2016)	

Information requested by Law 11/2018	Materiality	Paragraph of the report where a response is given	Reporting criterion (GRI 2021, unless otherwise stated)	Remarks/ reason for omission
Measures taken to improve energy efficiency	Material	4.9. CLIMATE CHANGE AND MANAGEMENT OF OTHER EMISSIONS	GRI 3-3	
Use of renewable energies	Material	4.8. SUSTAINABLE USE OF RESOURCES	GRI 302-01 b) (GRI Version 2016)	
Climate change				
Significant elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces	Material	4.9. CLIMATE CHANGE AND MANAGEMENT OF OTHER EMISSIONS	GRI 305-01 a) (GRI Version 2016) GRI 305-02 a) c) (GRI Version 2016)	Not applicable
Measures adopted to adapt to the consequences of climate change	Material	4.9. CLIMATE CHANGE AND MANAGEMENT OF OTHER EMISSIONS	GRI 3-3	Not applicable
Voluntary medium and long-term reduction targets set to reduce greenhouse gas emissions and the means implemented for that purpose	Material	4.9. CLIMATE CHANGE AND MANAGEMENT OF OTHER EMISSIONS	GRI 305-05 a) (GRI Version 2016)	Not applicable
Biodiversity				
Biodiversity protection: Measures taken to preserve or restore biodiversity.	Material	4.10. PROTECTION OF BIODIVERSITY	GRI 3-3	Not applicable
Protection of biodiversity: Impacts caused by activities or operations in protected areas	Based on the materiality analysis performed, it is not considered that the company has a material impact on this issue.	Not applicable	Not applicable	Not applicable
SOCIAL AND STAFF-RELATED ISSUES				
Employment				
Management approach: Policies and risks	Material	5.1. MANAGEMENT APPROACH 5.2. POLICIES ON SOCIAL AND STAFF ISSUES	GRI 3-3 GRI 2-23 a)	Not applicable
Total number and distribution of employees according to representative diversity criteria (gender, age, country, etc.)	Material	5.9. EMPLOYEE STATISTICS AS AT 31 DECEMBER 2022	GRI 2-7 a) GRI 2-7 b) i ii iv v	The average data for the year is not reported as the variation between the average data and the year-end data does not provide relevant material information. The company will assess the relevance of reporting this information in the following years.
Total number and distribution of types of employment contracts, average annual number of permanent contracts, temporary contracts and part-time contracts by sex, age and professional category	Material	5.9. EMPLOYEE STATISTICS AS AT 31 DECEMBER 2022	GRI 2-7 a) GRI 2-7 b) i ii iv v	The average data for the year is not reported as the variation between the average data and the year-end data does not provide relevant material information. The company will assess the relevance of reporting this information in the following years.
Number of dismissals by gender, age and professional category	Material	5.9. EMPLOYEE STATISTICS AS AT 31 DECEMBER 2022	GRI 3-3	Not applicable
Average earnings and their development broken down by gender, age and professional category or equal value.	Material	5.9. EMPLOYEE STATISTICS AS AT 31 DECEMBER 2022	GRI 405-02 a) (GRI Version 2016)	Not applicable
Wage gap, the remuneration for equal or average jobs in society	Material	5.9. EMPLOYEE STATISTICS AS AT 31 DECEMBER 2022	GRI 405-02 a) (GRI Version 2016)	Not applicable

Information requested by Law 11/2018	Materiality	Paragraph of the report where a response is given	Reporting criterion (GRI 2021, unless otherwise stated)	Remarks/ reason for omission
The average remuneration of directors and executives, including variable remuneration, allowances, indemnities and payments to long-term savings schemes and any other payments broken down by gender.	Material	5.9. EMPLOYEE STATISTICS AS AT 31 DECEMBER 2022	GRI 405-02 a) (GRI Version 2016)	Not applicable
Implementation of work disengagement policies	Material	5.3. WORK ORGANISATION	GRI 3-3	Not applicable
Employees with disabilities	Material	5.9. EMPLOYEE STATISTICS AS AT 31 DECEMBER 2022	GRI 405-01 b) iii (GRI Version 2016)	Not applicable
Work organisation				
Organisation of working hours	Material	5.3. WORK ORGANISATION	GRI 3-3	Not applicable
Number of hours of absence	Material	5.3. WORK ORGANISATION	GRI 403-09 a) (GRI Version 2018)	Not applicable
Measures aimed at facilitating the enjoyment of work-life balance and encouraging the co-responsibility of achieving a work-life balance by both parents.	Material	5.3. WORK ORGANISATION	GRI 3-3	Not applicable
Organisation of working time	Material	5.3. WORK ORGANISATION	GRI 3-3	Not applicable
Health and safety				
Occupational health and safety conditions	Material	5.4. HEALTH AND SAFETY	GRI 3-3	Not applicable
Accidents at work, in particular their frequency and severity, as well as occupational injuries; disaggregated by sex.	Material	5.4. HEALTH AND SAFETY	GRI 403-09 a) (V. GRI 2018) with regard to number and rate of accidents) GRI 403-10 a) i (GRI Version 2018)	Not applicable
Social relations				
Organisation of social dialogue, including procedures for informing and consulting with staff and negotiating with them	Material	5.5. SOCIAL RELATIONS	GRI 3-3	Not applicable
Percentage of employees covered by collective bargaining agreements by country	Material	5.5. SOCIAL RELATIONS	GRI 2-30 a)	Not applicable
The balance sheet of collective bargaining agreements, particularly in the field of occupational health and safety	Material	5.5. SOCIAL RELATIONS	GRI 3-3	Not applicable
Training				
The policies implemented in the field of training	Material	5.6. TRAINING	GRI 3-3 GRI 404-02 a) (GRI Version 2016)	Not applicable
The total number of training hours per professional category	Material	5.6. TRAINING	GRI 404-01 (GRI Version 2016)	Not applicable
Universal accessibility				
Universal accessibility for people with disabilities	Material	5.7. UNIVERSAL ACCESSIBILITY FOR PERSONS WITH DISABILITIES	GRI 3-3 GRI 405-01 b) iii (GRI Version 2016)	No aplica
Equality				
Measures taken to promote equal treatment and opportunities for women and men	Material	5.8. EQUALITY	GRI 3-3	Not applicable
Equality plans (Chapter III of Organic Law 3/2007, of 22 March, for the effective equality of Measures taken to promote equal treatment and opportunities for women and men (and men), measures adopted to promote employment, protocols against sexual and gender-based harassment, integration and universal accessibility of people with disabilities.	Material	5.8. EQUALITY	GRI 3-3	Not applicable
(and men), measures adopted to promote employment, protocols against sexual and gender-based harassment, integration and universal accessibility of people with disabilities.	Material	5.8. EQUALITY	GRI 3-3	Not applicable
HUMAN RIGHTS				
Management approach: Policies and risks	Material	6.1. MANAGEMENT APPROACH	GRI 3-3 GRI 2-23 a)	Not applicable

Information requested by Law 11/2018	Materiality	Paragraph of the report where a response is given	Reporting criterion (GRI 2021, unless otherwise stated)	Remarks/ reason for omission
Implementation of human rights due diligence procedures; prevention of risks of human rights violations and, where appropriate, measures to mitigate, manage and remedy possible infringements	Material	6.2. APLICACIÓN DE PROCEDIMIENTOS DE DILIGENCIA DEBIDA EN MATERIA DE DERECHOS HUMANOS	GRI 3-3 GRI 2-26 a) ii	Not applicable
Complaints of human rights violations	Material	6.2. APLICACIÓN DE PROCEDIMIENTOS DE DILIGENCIA DEBIDA EN MATERIA DE DERECHOS HUMANOS	GRI 3-3 GRI 406-01 a) (V. GRI 2016)	Not applicable
Promotion and enforcement of the provisions of the International Labour Organisation's core conventions relating to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in respect of employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour.	Material	6.1. MANAGEMENT APPROACH	GRI 3-3	Not applicable
CORRUPTION AND BRIBERY				
Management approach: Policies and risks	Material	7.1. MANAGEMENT APPROACH	GRI 3-3 GRI 2-23 a)	Not applicable
Measures taken to prevent corruption and bribery	Material	7.5. MEASURES TAKEN TO PREVENT CORRUPTION AND BRIBERY 7.3. POLICY OUTCOMES 7.4. RISKS	GRI 3-3 GRI 205-03 a) (V. GRI 2016) GRI 2-26 a) ii	Not applicable
Measures to combat money laundering	Material	7.3. POLICY OUTCOMES	GRI 3-3	Not applicable
Contributions to foundations and non-profit organisations	Material	7.4. RISKS	GRI 3-3	Not applicable
SOCIETY				
Company commitment to sustainable development				
Management approach: Policies and risks	Material	8.1. MANAGEMENT APPROACH	GRI 3-3 GRI 2-23 a)	Not applicable
The impact of the company's activity on employment and local development	Material	8.2. COMMITMENT TO SUSTAINABLE DEVELOPMENT 8.5. IMPACT OF THE ACTIVITY ON THE LOCAL POPULATIONS AND TERRITORY	GRI 3-3	Not applicable
The impact of the company's activity on local populations and the territory	Material	8.5 IMPACT OF THE ACTIVITY ON LOCAL POPULATIONS AND TERRITORY	GRI 413-01 (V. GRI 2016)	Not applicable
Relations with local community stakeholders and the modalities of dialogue with them.	Material	8.5 IMPACT OF THE ACTIVITY ON LOCAL POPULATIONS AND TERRITORY	GRI 413-01 (V. GRI 2016)	Not applicable
Partnership or sponsorship actions	Material	7.8. MEMBERSHIP OF SECTORAL ASSOCIATIONS	GRI 3-3	Not applicable
Subcontracting and suppliers				
Inclusion of social, gender equality and environmental issues in acquisition policy.	Material	8.3. SUBCONTRACTING AND SUPPLIERS	GRI 3-3	Not applicable
Consideration in relations with suppliers and subcontractors of their social and environmental responsibility	Material	8.3. SUBCONTRACTING AND SUPPLIERS	GRI 2.6 GRI 308-01 (V. GRI 2016) GRI 414-01 (V. GRI 2016)	Not applicable
Monitoring and audit systems and audit results	Material	8.3. SUBCONTRACTING AND SUPPLIERS	GRI 2.6 GRI 308-01 (V. GRI 2016) GRI 414-01 (V. GRI 2016)	Not applicable
Consumers				
Consumer health and safety measures	As the Group does not deal with end-consumers, there is no relevant impact to be considered.	Not applicable	Not applicable	Not applicable
Complaint systems, complaints received and their resolution	Material	Not applicable	Not applicable	Not applicable
Tax information				
Country-by-country benefits	Material	8.6. TAX INFORMATION	GRI 3-3	Not applicable
Taxes on profits paid	Material	8.6. TAX INFORMATION	GRI 3-3	Not applicable
Public subsidies received	Material	8.6. TAX INFORMATION	GRI 201-04 a) (V. GRI 2016)	Not applicable
European Taxonomy				
Report on the EU Taxonomy		2.3 REPORTING IN RELATION TO THE EU TAXONOMY	Regulation (EU) 2020/852	Not applicable

The non-financial information statement of the group in Ziérbena, as at 30 March 2023, is hereby declared:



José Creixell Sureda
President



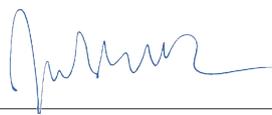
Victor Creixell de Vilallonga
Board Member



Oscar Creixell de Vilallonga
Board Member



Maria Creixell de Vilallonga
Board Member



Jordi Creixell Sureda
Secretary-Board member



TRADEBE

(Translation from the original in Spanish. In case of discrepancy, the Spanish language version prevails)

GRUPO TRADEBE MEDIO AMBIENTE, S.L. AND SUBSIDIARY COMPANIES

Independent assurance report on the Sustainability Report for the financial year closing on 31 December 2022

INDEPENDENT ASSURANCE REPORT ON THE SUSTAINABILITY REPORT OF GRUPO TRADEBE MEDIO AMBIENTE, S.L., AND SUBSIDIARY FOR THE 2022 FINANCIAL YEAR

For the partners of Grupo Tradebe Medio Ambiente, S.L.:

In accordance with Article 49 of the Commercial Code, we have performed a limited assurance review of the Sustainability Report (hereinafter Report) for the financial year closing on 31 December 2022 of Grupo Tradebe Medio Ambiente, S.L. and subsidiary companies (hereinafter, Group), which contains the Consolidated Non-Financial Information Statement (hereinafter CNFIS) and which forms part of the Group's Consolidated Management Report for financial year 2022.

The content of the Report includes additional information to that required by the prevailing mercantile legislation concerning non-financial information which has not been the subject of our assurance work. In this regard, our assurance work was limited exclusively to providing assurance on the information contained in the Annex II- Table of contents of the Law and Taxonomy included in the Report.

Responsibility of the directors

The formulation of the CNFIS included in the Report and which forms part of the Group's Consolidated Management Report for the 2022 financial year, as well as its content, is responsibility of the Management of Grupo Tradebe Medio Ambiente, S.L. The CNFIS has been prepared in accordance with the prevailing mercantile legislation and selected GRI Standards based on each subject area included in the Annex II- Table of contents of the Law and Taxonomy included of the aforementioned Report.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the Report is free of any material misstatements due to fraud or error.

The directors of Grupo Tradebe Medio Ambiente, S.L. are also responsible for defining, implementing, adapting, and maintaining the management systems from which the information required to prepare the Report was obtained.

Our independence and quality control

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professionals Accountants issued by the International Ethics Standards Board for Accountants and based on the

fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies prevailing international quality standards and accordingly maintains a global quality control system including policies and documented procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

The engagement team has been comprised of professionals with expertise in reviewing non-financial information and, specifically, in information on economic, social and environmental performance.

Our responsibility

Our responsibility is to express our conclusions in an independent limited assurance verification report based on the work performed.

We carried out our review engagement in accordance with the requirements established in the Revised International Standard on Assurance Engagements (ISAE) 3000, "Assurance Engagements other than Audits or Review of Historical Financial Information" issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and with the Guidelines of assurance engagements on the Non-Financial Information Statement issued by the Spanish Institute of Registered Auditors (ICJCE).

In accordance with the ISAE 3000 Standard, we have planned and executed our procedures to obtain limited assurance on whether the CNFIS has been prepared, in all significant aspects, in accordance with the prevailing mercantile legislation and selected GRI Standards based on each subject area included in the Annex II- Table of contents of the Law and Taxonomy of the aforementioned Report.

The procedures performed in a limited assurance engagement vary in nature and timing and are less extensive than those carried out in reasonable assurance engagement and, consequently, the level of assurance provided is substantially lower.

Our work has consisted of making inquiries of management, as well as different areas of Grupo Tradebe Medio Ambiente, S.L., that participated in the preparation of the Report, reviewing the processes for compiling and validation the information presented in the Report and applying certain analytical procedures and sample review tests, with are described below:

- Meetings with the staff of Grupo Tradebe Medio Ambiente, S.L. to gain understanding of the business model, policies and management approaches applied, the main risks related to these matters and obtain the necessary information for the external review.
- Analysis of the scope, relevance and integrity of the contents included in the Report for the year 2022 based on the materiality analysis carried out by Grupo Tradebe Medio Ambiente, S.L. and described in 1.2. Analysis of materiality and interest groups bearing in mind the provisions of the commercial regulations in force.

- Analysis of the information collection and validation processes presented in the Report for the financial year 2022.
- Review of information related to the risks, policies and management approaches applied regarding the material topics presented in the Report for the financial year 2022.
- Corroboration through samples testing of the information related to the contents of the Report for the financial year 2022 and if it has been adequately compiled based on data provided by the information sources.
- Review of the information on the Taxonomy of activities in accordance with Regulation (EU) 2020/852 on the establishment of a framework to facilitate .
- Obtaining a letter of representations from the Administrators and the Management.

Conclusion

Based on the procedures carried out and the evidence we have obtained, no additional aspect has been revealed that would lead us to believe that the CNFIS, included in the Report, of Grupo Tradebe Medio Ambiente, S.L. and subsidiary companies for the financial year closing on 31 December 2022 has not been prepared, in all material aspects, in accordance with prevailing mercantile legislation and selected GRI Standards based on each subject area included in the Annex II- Table of contents of the Law and Taxonomy of the aforementioned Report.

Emphasis of Matter

As explained in section 2.3 Reporting in relation to the EU Taxonomy of the Sustainability Report which includes the CNFIS, the administrators have included in the Report, which contains the CNFIS, the requirements of the Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020 on the establishment of a framework to facilitate sustainable investments that establishes the obligation to disclose information on sustainable investment in how and to what extent the company's activities are associated with economic activities that are considered environmentally sustainable or eligible in relation to the objectives of climate change mitigation and adaptation to climate change for the financial year 2021, although the Group by its characteristics is not an entity of public interest and has no legal obligation to do so. For the year 2022, although this obligation is extended and remains applicable only to entities of public interest, it implies disclosing the activities of the company associated with economic activities aligned in relation to the objectives indicated above, the company voluntarily discloses the information associated with eligibility in relation to the two indicated climate objectives. Additionally, it should be noted that the directors of Grupo Tradebe Medio Ambiente, S.L. have incorporated information on the criteria that, in their opinion, best allow to give the information required by Regulation mentioned before and that are defined in section 2.3 Reporting in relation to the EU Taxonomy of the CNFIS, included in the Group's Consolidated Management Report. Our conclusion has not changed on this issue.

Use and distribution

In accordance with the terms and conditions of our letter of engagement, this report has been prepared for Grupo Tradebe Medio Ambiente, S.L. in relation to its 2022 Sustainability Report, and therefore, has no other purpose, nor can it be used in any other context.

Regarding the CNFIS, included in the Sustainability Report, this report has been prepared in response to the requirement established in the prevailing mercantile legislation in Spain, and thus may not be suitable for other purposes and jurisdictions.

RSM SPAIN AUDITORES, S.L.P.
Mario Cepero Randos
Partner

Barcelona, 31 March 2023