

# 2023 SUSTAINABILITY REPORT



**TRADEBE**



**TRADEBE**

**2023**

SUSTAINABILITY REPORT

GRUPO TRADEBE MEDIO AMBIENTE, S.L.  
And its subsidiaries

# INDEX

## 1 ABOUT THIS REPORT 6

- 1.1 INTRODUCTION 7
- 1.2 MATERIALITY AND STAKEHOLDER ANALYSIS 8

## 2 ORGANISATION AND ENVIRONMENT 12

- 2.1 ORGANISATIONAL PROFILE 13
- 2.2 BUSINESS ENVIRONMENT 16
- 2.3 OUR PURPOSE: SUSTAINABLE GROWTH 20
- 2.4 GOVERNANCE 22

## 3 OBJECTIVES, RISKS AND MITIGATING FACTORS 24

- 3.1 MAIN RISKS AND MITIGATING FACTORS 26
- 3.2 COMMITMENT TO THE SUSTAINABLE DEVELOPMENT GOALS 30

## 4 ENVIRONMENTAL ISSUES 32

- 4.1 MANAGEMENT APPROACH 33
- 4.2 GROUP POLICIES ON ENVIRONMENTAL ISSUES 36
- 4.3 POLICY OUTCOMES 38
- 4.4 IMPACT OF THE GROUP'S ACTIVITY ON THE ENVIRONMENT 40
- 4.5 PRECAUTIONARY PRINCIPLE 41
- 4.6 PROVISIONS AND GUARANTEES 42
- 4.7 CIRCULAR ECONOMY AND WASTE MANAGEMENT 44
- 4.8 SUSTAINABLE USE OF RESOURCES 47
- 4.9 CLIMATE CHANGE AND MANAGEMENT OF OTHER EMISSIONS 55
- 4.10 EFFECTS OF CLIMATE CHANGE 63
- 4.11 BIODIVERSITY PROTECTION 65

## 5 SOCIAL AND STAFF ISSUES 66

- 5.1 MANAGEMENT APPROACH 67
- 5.2 POLICIES ON SOCIAL AND STAFF ISSUES 70
- 5.3 WORK ORGANISATION 74
- 5.4 HEALTH AND SAFETY 77
- 5.5 SOCIAL RELATIONS 80
- 5.6 TRAINING 81
- 5.7 UNIVERSAL ACCESSIBILITY FOR PEOPLE WITH DISABILITIES 84
- 5.8 EQUALITY 85
- 5.9 INTERGENERATIONAL DIVERSITY 87
- 5.10 PAY GAP 88

## 6 CYBERSECURITY 92

- 6.1 MANAGEMENT APPROACH 93
- 6.2 CYBERSECURITY POLICIES AND PROCEDURES 94

## 7 HUMAN RIGHTS 96

- 7.1 MANAGEMENT APPROACH 97
- 7.2 IMPLEMENTATION OF HUMAN RIGHTS DUE DILIGENCE PROCEDURES 99



## **8 FIGHT AGAINST CORRUPTION AND BRIBERY 100**

<b>8.1</b>	MANAGEMENT APPROACH	101
<b>8.2</b>	GROUP POLICIES ON ANTI-CORRUPTION AND BRIBERY	102
<b>8.3</b>	POLICY OUTCOMES	104
<b>8.4</b>	RISKS	104
<b>8.5</b>	MEASURES TAKEN TO PREVENT CORRUPTION AND BRIBERY	105
<b>8.6</b>	MEASURES TO COMBAT MONEY LAUNDERING	106
<b>8.7</b>	CONTRIBUTIONS TO FOUNDATIONS AND NON-PROFIT ORGANISATIONS	106
<b>8.8</b>	SECTORAL ASSOCIATIONS	107

## **9 SOCIETY 108**

<b>9.1</b>	MANAGEMENT APPROACH	109
<b>9.2</b>	COMMITMENT TO SUSTAINABLE DEVELOPMENT	109
<b>9.3</b>	SUBCONTRACTING AND SUPPLIERS	111
<b>9.4</b>	CUSTOMERS	112
<b>9.5</b>	IMPACT OF THE ACTIVITY ON LOCAL POPULATIONS AND TERRITORY	113
<b>9.6</b>	TAX INFORMATION	115

<b>ANNEX I - ENTITIES INCLUDED IN THE CONSOLIDATED FINANCIAL STATEMENTS</b>	<b>116</b>
---	------------

<b>ANNEX II - TABLE OF CONTENTS OF THE LAW</b>	<b>120</b>
--	------------





# ABOUT THIS REPORT

# 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 demand from its stakeholders – and 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 “2023 Sustainability Report”), corresponds to the period between 1 January and 31 December 2023.**

It has been prepared annually since 2018 and includes both individual and consolidated information on all the companies belonging to Tradebe (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 GRI (Global Reporting Initiative) standards which is the international reference framework for sustainability reporting. For those indicators that are not reflected in the aforementioned standards, our own reporting criteria have been followed.

In accordance with current legal requirements, this 2023 Sustainability Report has been verified by RSM Spain Auditores, S.L.P.

Any queries about the report or its contents should be addressed to the company via its website: **[www.tradebe.com](http://www.tradebe.com)**



# MATERIALITY AND STAKEHOLDER ANALYSIS

# 1.2

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

### The aim of this analysis is to:

1. Identify the most relevant environmental, social and governance aspects (hereinafter ESG ) for the business that may directly or indirectly impact the organisation's ability to create, preserve or add value, both for the company itself and its stakeholders;
2. Understand the importance of these aspects for internal and external stakeholders;
3. Prioritise the different aspects to be improved;
4. Understand the areas which have the highest risk exposure and ensure proper alignment with the concerns of our stakeholders and society as a whole.

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



<sup>1</sup> Material aspects are, in the context of sustainability reporting, those environmental, social and governance issues that are relevant to internal and external stakeholders.

<sup>2</sup> ESG stands for Environmental, Social and Governance.

The analysis has been divided into three phases:

#### STARTING POINT AND BENCHMARKING

- a) Review the results of the previous materiality analysis.
- b) Preliminary list of ESG factors to be incorporated into the analysis based on Tradebe's business model.
- c) Definition and identification of external and internal stakeholders.



#### STAKEHOLDER CONSULTATION

- a) Prioritisation and clustering of the 30 ESG issues to be included in the study
- b) Stakeholder consultation on the relevance and impact of the ESG issues that have been identified

The consulted parties represent the most relevant stakeholders in the company's supply and value chains and have been chosen based on strategic sustainability knowledge and the ability to identify major impacts on the business and third parties.

#### CONSTRUCTION OF THE MATRIX

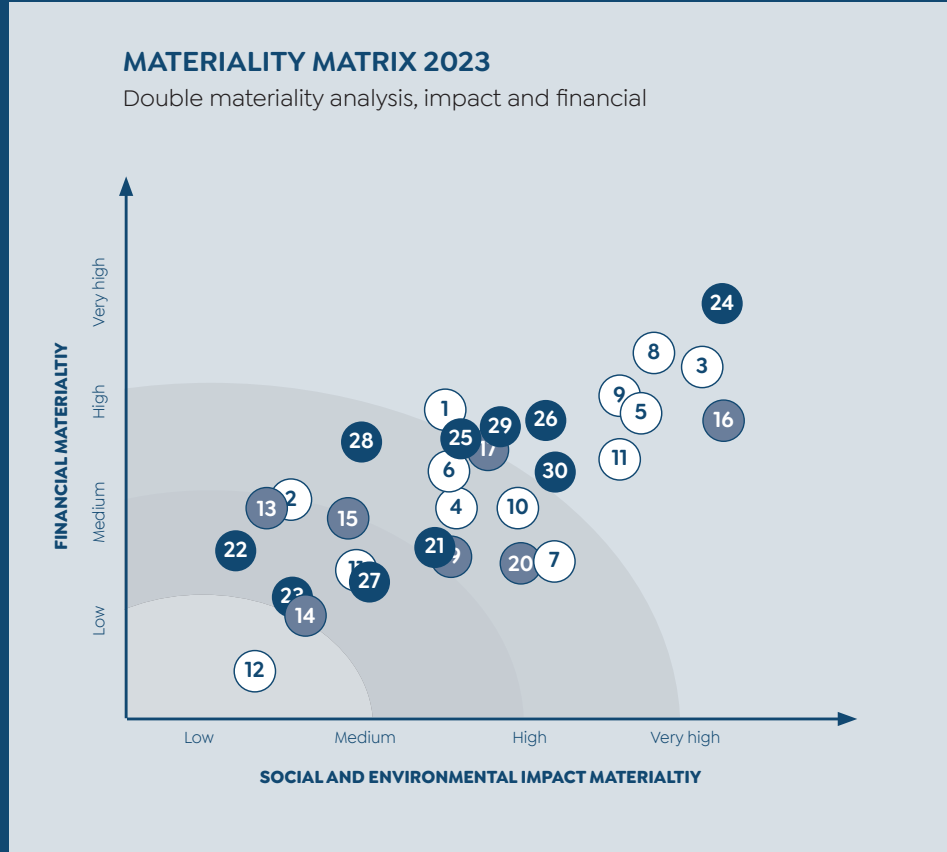
- a) Data processing and analysis of results
- b) Preparation of the materiality matrix

External customers, suppliers, collaborators, environmental associations and financial institutions, among others, have been consulted. Internally, members of the executive and management committees of the different lines of business have been consulted, as well as other members of the company with ESG awareness.

# RESULTS

The analysis carried out in 2023 prioritises the ESG issues identified according to the **relevance** and **impact** given to them by internal and external stakeholders, as well as the **likelihood** of these impacts occurring.

**In this way, the 30 ESG issues initially identified have been ranked in order of priority and are represented in the following graph.**



Following the ESRS<sup>3</sup>, guidelines, Tradebe has defined a materiality threshold to identify the key ESG sustainability issues. As a result, the ten most relevant and impactful issues for the company, and ultimately those on which Tradebe will focus its sustainability efforts in the short and medium term, are as follows:

1. **CYBERSECURITY (G)**
2. **INTEGRATION AND ENERGY EFFICIENCY IN THE PRODUCTION PROCESSES (E)**
3. **ENVIRONMENTAL RISK MANAGEMENT (E)**
4. **PROMOTION OF HEALTH AND SAFETY AT WORK (S)**
5. **USE OF RENEWABLE ENERGY AND ALTERNATIVE FUELS (E)**
6. **PREVENTION AND CONTROL OF AIR POLLUTION AND AIR QUALITY (E)**
7. **MITIGATION OF GHG (GREENHOUSE GAS) EMISSIONS (E)**
8. **RISK MANAGEMENT (G)**
9. **QUALITY OF PRODUCTS AND SERVICES (G)**
10. **COMMERCIAL MANAGEMENT WITH SUPPLIERS (G)**

<sup>3</sup> ESRS stands for European Sustainability Reporting Standards (ESRS). They are the standards that define the regulations of the Corporate Sustainability Reporting Directive (CSRD).



## ENVIRONMENTAL ASPECTS

- 1 Compliance with environmental and sustainability regulations
- 2 Management, maintenance and obtention of environmental certifications
- 3 Management of environmental risks
- 4 Circular economy and waste management efficiency
- 5 Prevention and control of atmospheric and air quality
- 6 Prevention and control of soil and water pollution
- 7 Efficiency in water usage and management
- 8 Integration and energy efficiency in production processes
- 9 Use of renewable energies and alternative fuels
- 10 Climate risks and adaptation
- 11 Mitigation of GHG emissions
- 12 Respecting biodiversity and preserving natural resources

## SOCIAL ASPECTS

- 13 Implementation of socially fair labour practices
- 14 Promotion of practices to reduce the wage gap
- 15 Existence of work-life balance and work disengagement practices
- 16 Promotion of health and safety at the work-place
- 17 Talent attraction and human capital development
- 18 Equal opportunities, diversity and flexibility
- 19 Human Rights in all direct operations and the supply chain
- 20 Fostering community well-being

## ECONOMIC AND GOVERNANCE ASPECTS

- 21 Fight against money laundering, corruption and bribery
- 22 Audits, supervision and certifications
- 23 Transparency and disclosure of information
- 24 Cybersecurity
- 25 Responsible management of commercial relationships
- 26 Risk management
- 27 Code of conduct
- 28 Innovation and digitization
- 29 Quality of products and services
- 30 Management of supplier relations

It is worth noting that, compared to the materiality analysis carried out in 2021, cybersecurity is the priority materiality aspect, and issues related to air pollution and the use of renewable energies have gained importance.

**The results of the materiality analysis justify the work carried out in recent years to closely monitor these issues and progress in the management of the most relevant ESG risks. On a day-to-day basis, these issues are addressed through specific measures taken by the committees of the various lines of business, the promotion of internal improvement, the achievement of international certificates, training and advice from expert consultants in each area.**

In the future, we will continue to work on these critical material aspects and the level of importance of the others will be monitored to anticipate specific problems.





# 2

ORGANISATION AND  
ENVIRONMENT



# 2.1 ORGANISATIONAL PROFILE

Grupo Tradebe Medio Ambiente, S.L., domiciled at Avenida Barcelona, 109, 5ª in Sant Joan Despí (Barcelona), Spain, is the holding company of the group (hereinafter, “Tradebe”).

**Today, Tradebe is a business organisation committed to creating a more sustainable planet and making meaningful contributions to people’s well-being.**

Tradebe is a family-owned company that was founded in 1984. It is dedicated to investing in sustainable businesses with a high growth potential worldwide. It began its operations by offering specialised environmental services to industry in Spain, and has since laid the foundations for one of its main lines of business today: Environmental Services.

Back in 1984, Tradebe’s founder identified the need to offer specialised environmental services to industry, demonstrating a pioneering vision to anticipate growing environmental concerns, and incorporate sustainable and environmental practices long before these became a global priority.

Since its inception, Tradebe has maintained a long-term vision, seeking opportunities that not only promote economic development, but also contribute to the general welfare of society and care for the environment.

In 2008, the company implemented an intense growth strategy through the internationalisation of the Environmental Services line of business to become the sector leader in Europe and America.



<sup>4</sup> See Annex I for all the companies that make up Tradebe, listed by country.

In 2020, Tradebe developed a new strategy to boost sustainable growth through:

■ **The consolidation of the Tradebe Environmental Services line of business**, which currently stands out for its leadership in the provision of environmental services in industry at an international level.

■ The successful **diversification into related industrial sectors** such as:

- **the chemical industry**, which plays a key role in the manufacturing of essential products for various sectors, such as agriculture, medicine, food, construction, electronics, and many others; and

- **the fine chemicals** industry, which refers to a more specific and specialised subdivision within the chemical industry. It focuses on the production of chemical compounds of high purity and precise specification. Fine chemicals are typically used in applications requiring very high-quality standards, such as pharmaceuticals, agrochemicals, electronics, and the manufacturing of speciality chemicals.

■ **Diversification into other sectors**, such as:

- the **Flavours and Fragrances** industry, dedicated to the production and marketing of chemical compounds designed to provide various products with pleasant smells or flavours; and

- caring for people's **health and well-being** through the production and marketing of specialised nutrition products. This includes the research, development and production of ingredients for personal care products and the manufacturing of essential healthcare compounds.



This strategy has given rise to **the three lines of business** that make up Tradebe today:

<b>TRADEBE ENVIRONMENTAL SERVICES</b>	Committed to protecting the planet by recycling and reusing industrial waste, where we strive to contribute to sustainability through responsible waste management practices and maximising the efficient use of natural resources.
<b>TRADEBE LIFE SCIENCES</b>	Where we contribute to a circular economy by purifying and manufacturing essential ingredients.
<b>TRADEBE HEALTH &amp; NUTRITION</b>	Where we work to transform nutritional ingredients into products that promote people's overall health and well-being.

As of December 2023, Tradebe operates in 74 permitted facilities<sup>5</sup> and has a team of 2,831 people in Continental Europe (mainly Spain, France, Italy and Germany), the United Kingdom and North America (mainly in the United States).

The following table shows the aggregate operating revenues and people per line of business as at 31 December 2023:

	ANNUAL REVENUE	ANNUAL REVENUE BY COUNTRY AND BUSINESS LINE					EMPLOYEES	YEAR
	M €	SP+FR	UK	USA	GER	ITA	N°	START
<b>ENVIRONMENTAL SERVICES</b>	<b>671</b>	<b>235</b>	<b>158</b>	<b>276</b>	<b>-</b>	<b>2</b>	<b>2.369</b>	<b>1984</b>
% business line	86%	35%	24%	41%	-	-	84%	
<b>LIFE SCIENCES</b>	<b>67</b>	<b>27</b>	<b>25</b>	<b>-</b>	<b>6</b>	<b>9</b>	<b>248</b>	<b>2003</b>
% business line	9%	40%	37%		10%	13%	9%	
Purification	53	13	25	-	6	9	201	2003
	7%	25%	47%		11%	17%	7%	
Flavours & Fragrances	14	14	-	-	-	-	47	2022
	2%	100%					2%	
<b>HEALTH &amp; NUTRITION</b>	<b>40</b>	<b>40</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>214</b>	<b>2022</b>
% business line	5%	100%					7%	
<b>TOTAL</b>	<b>778</b>	<b>302</b>	<b>183</b>	<b>276</b>	<b>6</b>	<b>11</b>	<b>2.831</b>	
% total	100%	39%	24%	35%	1%	1%	100%	

<sup>5</sup> Permitted facilities include approved treatment and management facilities, as well as certified laboratories.

# BUSINESS ENVIRONMENT

# 2.2

Tradebe currently manages a portfolio organised into three lines of business which are specialised in key sectors; each of which represents an integral part of the company's strategic vision:



## TRADEBE ENVIRONMENTAL SERVICES

Tradebe Environmental Services is the line of business with the highest revenue and most geographic diversity. It is an international leader in the provision of environmental services in Europe and America (USA), and its mission is to transform waste into opportunities and resources.

**86%**  
ANNUAL  
REVENUE  
(84% IN 2022)

**2.369**  
EMPLOYEES  
( $\Delta$  7%)

With a focus on recycling, energy recovery and the circular economy of industrial waste, it sustainably manages all types of environmental liabilities, generating new materials and energy resources. Environmental Services adds value to companies by helping them turn their waste into valuable resources, while caring for the planet. With a visionary approach and unwavering commitment to sustainability, it inspires positive change and drives innovation in the industry.

***Together, we are building a more sustainable future that benefits both the environment and businesses.***

Tradebe Environmental Services provides services to industry with high safety and quality standards. These services are **non-discretionary** (i.e. they are not subject to client choice and cannot be easily avoided which means they can therefore be considered essential) and closely related to:

- a) the existence of environmental legislation, policies and regulations;
- b) the implementation of and compliance with the legislative, policy and regulatory framework by the industry (generators of industrial waste); and
- c) the supervisory and control measures taken by the relevant environmental authorities and agencies to ensure compliance with such environmental legislation, policies and regulations.

It is a business based on building and preserving its proven reputation, know-how/expertise and implementing best operational and safety practices.





The catalogue of services provided by Tradebe Environmental Services is as follows:

<p>INDUSTRIAL WASTE MANAGEMENT</p> 	<p>LAB PACK</p> 	<p>INDUSTRIAL CLEANING</p> 	<p>REFINERY TANK CLEANING</p> 
<p>WASTE OIL PICK UP &amp; RECYCLING</p> 	<p>HYDROCARBON BLENDING &amp; RECYCLING</p> 	<p>SOLVENT BLENDING &amp; RECYCLING</p> 	<p>METAL RECYCLING</p> 
<p>CLINICAL WASTE MANAGEMENT</p> 	<p>MARINE SURVEY &amp; ENVIRONMENTAL CONSULTING</p> 	<p>NUCLEAR DECOMMISSIONING SERVICES</p> 	<p>NORM WASTE SERVICES</p> 
<p>HOUSEHOLD HAZARDOUS WASTE SERVICE</p> 	<p>EMERGENCY RESPONSE</p> 	<p>LABORATORY SERVICES</p> 	<p>TRANSPORTATION PICK UP SERVICES</p> 

## TRADEBE LIFE SCIENCES

# TRADEBE

## Life Sciences

**9%**  
ANNUAL  
REVENUE  
(10% IN 2022)

**248**  
EMPLOYEES  
(Δ 2%)

Tradebe Life Sciences has two specialised divisions:

### TRADEBE PURIFICATION

Founded as a spin-off from Tradebe Environmental Services, the evolution of this division reflects the transition from a business focused on the recovery of solvents from low-value products, to a business offering the production of high-purity, specific chemical compounds that meet the standards of high quality that are approved in the UK, Europe and the rest of the world.

Tradebe Purification offers innovative solutions to the pharmaceutical, agrochemical and agri-food industries. It has specialist know-how in the rectification and chemical synthesis of reagent distillation, expertise and the technology needed to strategically collaborate with businesses looking to purify and reuse materials and components, or innovative solutions for their production processes. Industry by-products are Tradebe Purification's raw materials.

This division operates mainly in Europe and has facilities in Spain (Gualba), Germany (Schwarzheide), Italy (Fidenza) and the UK (Sunderland and Rye).

### TRADEBE FLAVOURS & FRAGRANCES

While discussing this division, it is necessary to focus on the distinctions of the **Flavour and Fragrance** industry, since both have particular approaches to the production and application of chemical compounds.

In **Flavouring**, the sector specialises in creating sweet and savoury flavours and flavour emulsions for various food sectors, including confectionery, beverages, dairy, snacks and preserves. Tradebe entered this sector with the acquisition of **Cosmos Aromática** in 2022, one of the leading Spanish manufacturers of flavourings for the food industry, with over 70 years of experience in the design and creation of flavours.

**Fragrance** manufacturing focuses on the production of chemical compounds designed to be applied to products such as perfumes, colognes, skincare products and soaps, among others, to provide a pleasant olfactory experience. In this division, **Ebedart** is the company that specialises in the design and manufacture of fragrances for personal care (fine fragrances, cosmetics, etc.) and home care (detergents, air fresheners, etc.).



## TRADEBE HEALTH AND NUTRITION

**Tradebe Health & Nutrition** is the name given to the latest line of business to be incorporated (June 2022) into Tradebe's portfolio. It is a major player in the production and marketing of specialised nutrition products, serving both its own brands (Persan, CN Labs and Nutrisport) and third-party brands. The main objective of this business unit is to promote health and human well-being through sustainable and high-quality products, advocating a holistic approach to health.

The main strategic focus for development is the source of the products: proteins. We explore and optimise their potential with our advanced research and development capabilities, transforming them into the final product. By adopting a non-linear thinking approach, we move away from conventional methods, opening the way to new paths and breakthroughs.

Driven by a relentless pursuit of knowledge, **Tradebe Health & Nutrition** proactively anticipates future trends. We strive to inspire end users and companies to explore sustainable, efficient and innovative ways to harness the power of protein, aligned with our commitment to practical and visionary solutions in the industry.

## TRADEBE Health & Nutrition

**5%**  
ANNUAL  
REVENUE  
(6% IN 2022)

**214**  
EMPLOYEES  
(Δ 1%)



# OUR PURPOSE: SUSTAINABLE GROWTH

# 2.3

**Tradebe has 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 because of our employees. That's 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 we are committed to the environment and communities where we live and work.

Our commitment, capability, attitude and our team are key elements that have helped 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 well-being and preserve our world for future generations.





As a company, we are dedicated to promoting the circular economy and are committed to the environment and the communities where we live and work.



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 well-being and preserve our world for future generations.**

Our priority is to create safe, healthy and productive working environments.



We value and support our employees to be able to give the best of themselves in their day-to-day work.





# 2.4 GOVERNANCE

As at 31 December 2023, Tradebe's **Board of Directors** consisted of five members (one woman and four men) aged between 32 and 74.

**The members of the Board of Directors meet the criteria of good reputation, experience and good governance required by the relevant legislations and cover the range of expertise required by the group's activities.**

During 2023, the Board of Directors met formally on four occasions to review, be informed 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 lines of business has its own executive committee, consisting of the key executives in each line of business and the heads of corporate functions.







**VICTOR CREIXELL**  
CEO Environmental Services

Executive



**JOSEP CREIXELL**  
Founder & Chairman

Non-executive



**OSCAR CREIXELL**  
CEO Life Sciences

Executive



**JORDI CREIXELL**  
Legal Counsel

Non-executive



**MARIA CREIXELL**  
CEO Health & Nutrition

Executive





3

OBJECTIVES, RISKS  
AND MITIGATING  
FACTORS



Since it was founded, the search for opportunities that promote economic development, sustainable growth and contribute to the well-being of people and care for the environment has been a fundamental part of Tradebe's long-term strategy. The main focuses of this strategy are:

- **Competitive consolidation of the Environmental Services line of business** in the markets in which Tradebe is already operating. This has been demonstrated by the internationalisation of the Environmental Services line of business since 2008 and its consolidation as a recognised leader in the provision of environmental services to industry since 2020.
- **Diversification into related industrial sectors**, with a distinct innovative character, promoting the circular economy, and focused on the provision of specialised services with high added value for our customers, through the development of the Tradebe Purification line of business.
- **Diversification into other sectors with high growth potential**, as was achieved in 2022 with Flavours & Fragrances (a division belonging to the Life Sciences line of business) and with the Health & Nutrition line of business.

Our strategy is based on the following key principles that reflect our commitment to sustainability and long-term success:

The **CIRCULAR ECONOMY** drives our operations, guiding us towards a model that promotes the reuse and recycling of resources, thereby reducing our environmental footprint.

We seek to differentiate ourselves in the market through **INNOVATION AND QUALITY**, offering unique products and services that meet our customers' needs in an exceptional way.

The **ORGANISATIONAL CULTURE** we develop focuses on collaboration, transparency and adaptability, fostering an environment that encourages creativity and continuous improvement.

We recognise that our **PEOPLE** are the cornerstone of our success, which is why we promote an inclusive work environment, where each member contributes their expertise and commitment, to create a positive impact on all aspects of our business strategy.

# 3.1 MAIN RISKS AND MITIGATING FACTORS

Any strategy must be associated with proper risk management. Due to its geographical and business diversification, Tradebe is subject to various inherent risks in the different countries where it operates and in the different activities it carries out.

The Board of Directors is committed to developing its capabilities to identify, measure, manage and control significant risks that may impact the business and its strategy, and those generated for third parties by our operations.

Our main pillars of action are based on all actions aimed at controlling and mitigating these risks:

**Integrate the risk/opportunity perspective in the management of the company and include this variable in strategic and operational decisions.**

1

**Segregate functions as far as possible at 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.**

2

**Act in accordance with the law at all times, 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.**

3

**Ensure the use of hedging instruments and record them according to the applicable requirements for provisions.**

4

**There are different types of (non-financial) risk factors to which Tradebe is exposed. Some of the most relevant ones are shown below, as well as the risks inherent to each category and Tradebe's management of them:**

## REGULATORY

This category includes the following inherent risks:

### NON-COMPLIANCE WITH ENVIRONMENTAL OBLIGATIONS

### NON-COMPLIANCE WITH ENVIRONMENTAL LEGISLATION

### NON-COMPLIANCE WITH OCCUPATIONAL HEALTH AND SAFETY LEGISLATION

### LITIGATION AND CLAIMS

Tradebe's activities are subject to compliance with strict sector-specific and general regulations in the different jurisdictions in which it operates (accounting, environmental, 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** (Best Available Techniques reference documents) for Waste Treatment, published in 2018), the **EU Climate Pact and Green Deal** (COM/2019/640 final) and the European Commission's **Circular Economy Action Plan**, announced on 11 March 2020.

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 the revocation of licences, permits or authorisations or the imposition of fines or penalties, among others, that hinder or eventually prevent the development of all or part of Tradebe's activities.

The management approach is to consider this risk as an opportunity, promoting a culture or way of thinking based on an ethical commitment to doing things well, turning strict regulation into an opportunity for constant improvement and a symbol of excellence. Increasingly stringent environmental legislation means focusing even more efforts on achieving more efficient operating processes, as well as greater awareness among customers and society in general.

All of Tradebe's businesses operate in line with a range of best practices and standards, and the integrated management systems at each site enable activities to be managed as efficiently as possible while meeting the requirements of a world-class organisation in terms of environmental and safety issues. In the SHEQ department<sup>6</sup>, **a total of 78 professionals** are responsible for ensuring the correct application of the integrated management system and for carrying out activities that guarantee the prevention of environmental and occupational safety risks.

<sup>6</sup>SHEQ, stands for Safety, Health, Environment and Quality.

## HEALTH AND SAFETY

This category includes the following inherent risks:

### EXPOSURE OF INDIVIDUALS TO ACCIDENTS

### EXPOSURE OF FACILITIES TO INCIDENTS

Tradebe's activities and its employees are exposed to accidents and incidents. The company has a technical advisory service specialising in the safety of people and installations, as a support mechanism to prevent accidents from occurring. These services include training, preventive inspections, technical advice on health and safety, and technical consultancy services.

The management approach is that nothing justifies an accident – all accidents and dangerous occurrences are preventable – and safety must be actively managed.

In this case, the team of professionals in the SHEQ department is also responsible for carrying out the activities that guarantee the prevention of health and safety risks in the workplace.

**Care for the health and safety of employees is above and beyond being a priority and has been included among the group's values.**

## CYBERSECURITY

This category includes the following inherent risks:

### EXPOSURE TO CYBERATTACKS

### LOSS OF EFFICIENCY AND COMPETITIVENESS DUE TO A LACK OF DIGITALISATION

In addition to the strategy of digitalisation and improving the efficiency of business processes, Tradebe prioritises **cybersecurity as part of its strategy**.

The importance of managing this risk was reaffirmed by the materiality analysis, where cybersecurity was ranked first according to the assessment carried out by the company's different stakeholders.

To manage this risk, Tradebe has a specialised cybersecurity team (led by the **Global IT Security Manager**) as well as a **Cybersecurity Committee**. In addition, specific policies and procedures have been established for this area, including the **Information Security and Management Policy**. Furthermore, specific courses have been delivered and awareness-raising campaigns have been carried out for employees.

The internal policies established to properly manage systems and information at Tradebe are based on the best practices of the ISO 27002 standards and NIST (National Institute of Standards and Technology) guidelines.



## CLIMATE CHANGE

This category includes the inherent risk of:

### EXPOSURE TO CLIMATE RISKS

During 2023, Tradebe undertook an **analysis of the risks and opportunities arising from climate change**, starting with the Tradebe Environmental Services facilities in Spain. This has enabled us to identify the possible effects on the group's assets in this geographical area in order to determine mitigating actions, if necessary. The plan is to continue with the study in the coming years and extend the scope to other geographical areas and lines of business.

Some of the climatic variables that may affect the group are temperatures, precipitation, wind, floods or fires.

According to the study, some of the potential **risks** faced by Tradebe include increasing obligations to reduce emissions, the volatility of raw material prices, or changes in demand for carbon-intensive services.

However, it also helps to identify **opportunities** such as the emergence of new technologies with a reduced environmental impact or the growth of the circular economy.



# COMMITMENT TO THE SUSTAINABLE DEVELOPMENT GOALS

In addition, and with a firm commitment to contributing to sustainable industrial development, Tradebe takes the Sustainable Development Goals (SDGs) into account in its day-to-day operations.

Collectively, the 17 SDGs include 169 targets set by the United Nations and constitute a universal plan to address challenges such as eradicating poverty, protecting the planet and ensuring people's prosperity.

Many companies are committed to these goals and are directing their efforts to contribute to their achievement until 2030, when progress will be measured.



Below are some examples of actions undertaken by Tradebe in 2023 and the SDGs to which they relate:

A number of innovation projects are currently underway at **Environmental Services facilities in the UK**, the implementation of which will take place over the next five years. These projects mainly contribute to **SDG 9** (Industry, Innovation and Infrastructure), as well as other SDGs:

**HOSPITAL WASTE PLASTIC RECYCLING PROJECT IN QUEENSLIE**  
**RESEARCH INTO THE USE OF HYDROGEN/ELECTRICITY AS A FUEL FOR TRANSPORTATION**  
**ENERGY RECOVERY PROJECT AT THE FAWLEY FACILITY**  
**PROJECT FOR THE USE OF SALMON SLUDGE AS A BIOMASS FUEL**

Specific **energy efficiency** awareness training has been carried out at **Tradebe Environmental Services facilities in the UK**, and environmental and sustainability awareness training is planned for 2024.

**Tradebe Environmental Services facilities in Spain** closely monitor all employee training and facility improvements carried out throughout the year to ensure safe workplaces and to promote efficient operations. In addition, an effort is made to relate all these actions to the SDGs. For example: those that promote health and well-being (**SDG 3**), industrial development (**SDG 9**), a safe working environment (**SDG 8**), and the sustainable management and efficient use of natural resources (**SDG 12**).

At the **Gualba facility (Life Sciences | Purification – Spain)**, carbon filters have been installed to improve the VOC (Volatile Organic Compounds) reduction system, in line with the **BREF for Waste Treatment**.

At the **Rye facility (Life Sciences | Purification – UK)**, **energy efficiency** improvements have been made in the offices by installing a more efficient diesel boiler.

At the **L'Ametlla del Vallès facility (Life Sciences | Flavours & Fragrances – Spain)**, the old air conditioning system has been replaced with more **efficient equipment**.





4

# ENVIRONMENTAL ISSUES



# 4.1 MANAGEMENT APPROACH

Tradebe is firmly committed to creating a more sustainable planet and making significant contributions to people's well-being, by placing environmental issues at the core of its operations and considering them to be one of the most relevant material aspects for its Sustainability Report.

The following issues, relevant to our strategy and in line with the requirements established by Law 11/2018 on non-financial information and diversity, are addressed in more detail below:

- **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 management of other emissions**
- **Biodiversity protection**

## RISK MANAGEMENT: INTEGRATED MANAGEMENT SYSTEMS, LICENSING AND CERTIFICATION

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

***Safety, Health and Environmental Quality are an integral part of the business, consequently, optimum performance is expected in this area.***

Environmental risk analysis and management considers all activities, processes and services, including those activities that are not carried out directly by Tradebe, but over which the company can exert some influence.



As confirmed by the materiality analysis, the following risks are among the most relevant:

1. General environmental risk management
2. Integration and energy efficiency in production processes
3. Prevention and control of air pollution and air quality
4. Use of renewable energy and alternative fuels
5. Mitigation of greenhouse gas (GHG) emissions
6. Compliance with environmental and sustainability regulations
7. Promotion of health and safety at work

Tradebe has **integrated management systems** which, together with the stringent safety requirements set out in the facilities' own **licences**, provide the framework for ensuring that these types of risks are properly identified, communicated and managed. They are also evidence of the company's ongoing commitment to compliance with legal and environmental requirements.

In the UK and Spain, these integrated management systems are also accredited by independent third parties through **ISO certifications**. These certifications, together with strict integrated environmental authorisations and permits such as those of the Resource Conservation and Recovery Act (RCRA)<sup>7</sup> United States, constitute the reference framework for the group's safety, health and environmental policies.

**THE DIFFERENT CERTIFICATIONS HELD BY TRADEBE ARE SHOWN BELOW:**

 7 RCRA sites United States Environmental Protection Agency	 40 certificates ISO 9001 (Quality management)	 38 certificates ISO 14001 (Environmental management)	 27 certificates ISO 45001 (Health and Safety Management)	 2 certificates ISO 22000 (Food Safety Management)	 3 certificates ISCC Plus (Sustainability and Carbon)	 1 certificates ISCC EU (Sustainable Fuels)
 3 certificates MASE (France)	 Certificates for Steel recycling + Aluminium recycling (2 sites)	 18 certificates ISO 50001 (Energy Management)	 4 certificates ISO 17025 (Competent laboratories)	 3 certificates ISO 17020 (Conformity Assessment)	 1 certificates FSSC 22000 (Food Safety)	 Halal and Kosher in Flavours & Fragrances

In short, the environmental performance reports periodically submitted to the relevant authorities, the internal reviews of the integrated management systems, and the external audits to which ISO-certified sites are subject, complement each other to ensure proper environmental risk management.

**All of Tradebe's operations are focused on operational efficiency. This is achieved by controlling three key aspects: consumption of raw materials, natural resources and energy.**

<sup>7</sup> RCRA permits are issued by the states or by the EPA (US Environmental Protection Agency). They establish the requirements for the treatment, storage and disposal of hazardous waste, as well as the frequency of inspections and their scope.

In this context, each risk is managed and prevented as efficiently as possible, depending on its nature. Some examples of specific measures to manage risks are shown below:

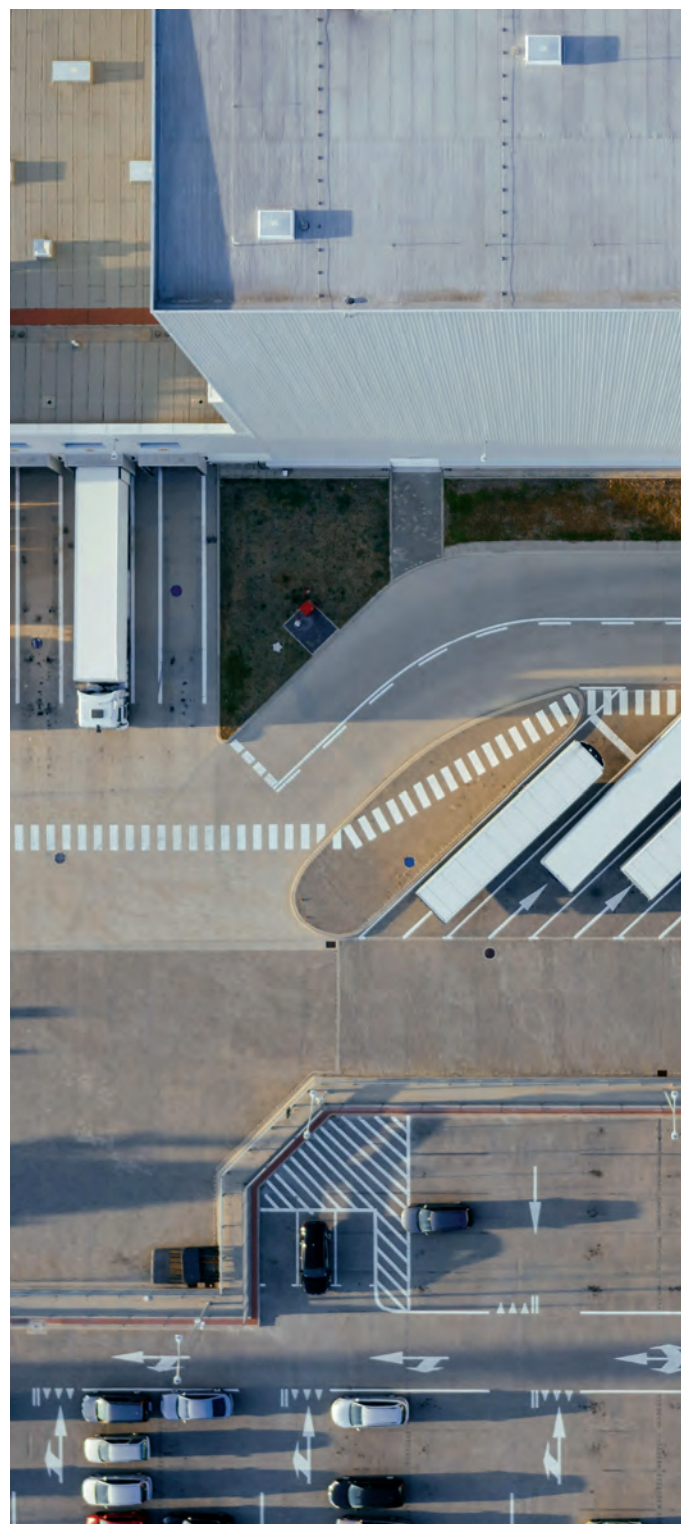
**REGULAR SAFETY INSPECTIONS** of drum and container storage areas to check their structural integrity and proper sealing. In addition, tanks and containers are built on a concrete base with specific characteristics to control and prevent risk in the event of any spillage. Any accidental spillage that occurs in these areas is collected, analysed and managed appropriately.

**IMPLEMENTATION OF PREVENTIVE MEASURES** against possible fires and/or chemical reactions in order to ensure that conditions of extreme heat, high pressure, fire, explosions or violent reactions, among others, do not occur, as well as prevent the emission of toxic gases that could be hazardous to health.

**CONTROL OF DISCHARGE PROCESSES:** in order to prevent the risk of groundwater contamination by accidental spillage, the discharge of hazardous waste into unprotected soils is not permitted.

**PROVISION AND REVIEW OF EMERGENCY EQUIPMENT** in processing, storage, laboratory and office areas, such as easily accessible fire extinguishers, first aid kits, eye wash stations, etc. Emergency equipment is properly inspected in line with the established schedule, even more frequently if necessary, and specific training in the use of this equipment is provided to facility personnel.

**INSTALLATION AND MAINTENANCE OF EMISSION CONTROL SYSTEMS**, subject to strict (state and/or regional) regulation, and always as required by international permits and certifications.





# GROUP POLICIES ON ENVIRONMENTAL ISSUES

In its integrated management system, Tradebe has environmental policies that set the framework to ensure that operations are carried out in a responsible and sustainable manner, in line with Tradebe's objectives.

## QUALITY, SAFETY AND ENVIRONMENT

With this policy<sup>8</sup>, Tradebe expresses its strong commitment to people's health and safety, the protection of the environment, the satisfaction of its customers and the profitable growth of the business.

This firm commitment is demonstrated by integrating fundamental principles concerning safety, health, quality and the environment into day-to-day activities, which includes the following:

### HEALTH AND SAFETY:

- Promoting continuous improvement by carrying out risk analyses of activities to identify, manage and control risks appropriately.
- Maintaining facilities, equipment and work systems that are safe and free of health hazards for its workers.
- Training our employees in health and safety matters by providing them with the necessary training to enable them to carry out their activities safely.
- Ensuring that self-protection plans and emergency measures are effective in preventing damage and injuries in the event of possible accidents, including the existence of a crisis protocol.

### ENVIRONMENT:

- Promoting pollution prevention and environmental protection, including life-cycle and carbon footprint analyses, and taking measures to prevent or reduce greenhouse gas emissions.
- Incorporating climate change adaptation programmes, anticipating possible adverse effects and taking appropriate action to prevent or minimise the impact.
- Ensuring that proper analysis, treatment and management of waste is carried out in line with the European Waste Hierarchy.
- Identifying opportunities to optimise energy consumption.

<sup>8</sup> For the purposes of this report, and by way of example, the integrated safety, quality and environmental policies of Tradebe Environmental Services in Spain and the United Kingdom are presented in a unified way.

**QUALITY:**

- Offering a high-quality service to our customers, aimed at meeting their needs and expectations.
- Ensuring that proper inspection procedures are followed to prevent possible non-conformities.

## ENERGY EFFICIENCY<sup>9</sup>

Tradebe recognises efficient energy management as an integral part of its business and is therefore committed to achieving and maintaining optimum levels of energy consumption, while minimising energy costs without affecting business performance and productivity.

In order to implement these principles, actions will be taken such as:

- Formulating a plan to set, measure and review targets in those areas with relevant energy consumption;
- Promoting the purchase of energy efficient products and services;
- Promoting the reduction of energy consumption through improvements in facilities, equipment and processes; and
- Encouraging the reduction of energy consumption through training and communication to employees, suppliers, customers and other stakeholders.

<sup>9</sup> Extract from Tradebe Environmental Services energy management policy in the UK.

# 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, facility improvements are carried out every year with the aim of improving efficiency and safety.

## THESE INCLUDE THE FOLLOWING:

**Health and safety training for all employees**, and a continuous review of action protocols.

**Provision of the necessary protective equipment** at the facility to carry out operations in complete safety.

**Improvements to signage systems** and facility lighting.

**Replacement of machinery** with more efficient equipment (from an energy and operational perspective).

**Improvements to facilities to provide easier access** and/or make them safer (by installing handrails, etc.).

**Improvements in inventory management** (as has been the case in some US facilities) to keep inventory at sustainable levels that support efficient operations and safety.

**Improvements in signage** inside and outside the facilities (e.g. to better identify the reception and inspection area).

**Improvements in the facilities**, such as the new water treatment facility and the new centralised air conditioning equipment at the Argenton facility (Health & Nutrition), which for an **improved efficiency in water management and energy consumption**.

**Review of electricity contracts** to ensure that renewable energy is supplied in as many cases as possible.





## SUCCESS STORY: TECHNOLOGICAL INNOVATION AT THE GUALBA LABORATORY WITH THE KILO LAB

In line with our commitment to offer high-quality services to our customers, and with innovation as the driving force for progress and advancement, the Gualba R&D team (Life Sciences – Purification), in collaboration with the global engineering team, has recently installed a Kilo Lab – a service that allows greater flexibility and agility to manage projects and productions dynamically by scaling up tests.

The Kilo Lab is a substantial improvement on what is carried out in other laboratories, with all the testing of new products, process optimisation or customer requests. It does not replace the laboratory study, but complements it. This project is used to carry out scaling tests between laboratory and industrial size. It is an intermediate size that enables us to anticipate the behaviour of each process with greater precision than the results obtained in the laboratory, but at a lower cost than industrial-scale testing.

***This is the first facility of its kind in Tradebe's history, and particularly in Life Sciences, which allows us to develop new processes in response to market and customer requirements, as well as optimise resources without the need to outsource this service.***

Life Sciences' activity is intrinsically associated with the circular economy, aiming to recover molecules and minimise waste. **This facility will further optimise the processes, both in terms of recovery percentage (and therefore waste minimisation), as well as the final quality of recovered products, energy efficiency and the resources required** (reagents, additives, etc.).

# IMPACT OF THE GROUP'S ACTIVITY ON THE ENVIRONMENT

With its core activity, Tradebe contributes to sustainability through the recovery of raw materials (metals, solvents, oils, etc.), 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 (e.g. in the cement industry) and preventing the release of emissions into the atmosphere.

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 as a final option.

Due to stringent regulation, the emission limits established by the regulator, and the group's high commitment to ethical compliance, Tradebe's activity, far from being considered a threat to health and the environment, is a key element in caring for the environment.

## AVOIDED EMISSIONS

In addition to using assets and technology that minimise the impact on the environment, such as energy-efficient or energy-saving equipment and emission control systems, **Tradebe plays a key role in preventing and reducing emissions into the atmosphere.**

As well as reducing the consumption of virgin raw materials, the use of purified solvents, recycled fuel, compost and recycled metals prevents the release of a significant volume of emissions into the atmosphere, since the emissions associated with the recycling of these materials are much lower than those from the production of virgin raw materials, as explained in more detail in section 4.9 on climate change and management of other emissions.

**Tradebe serves a wide range of industries, including the chemical, petrochemical, agrochemical, refinery, oil and gas production and exploration, energy, transportation and mining industries, among others, with the aim of minimising the impact of waste on the environment, while helping them to comply with the relevant environmental regulations. In addition, the option of providing industrial services at the customer's premises offers a holistic approach to the waste management service.**

# 4.5 PRECAUTIONARY PRINCIPLE

**The precautionary principle is a concept that supports the adoption of protective measures when there are well-founded suspicions that certain products or technology pose a serious risk to public health or the environment, but no definitive scientific proof is available yet.**

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 is mandatory because the European Union applies it in its legislation, both when regulating the Environment and when regulating Occupational Hazards.





# 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 up to €8.6 million per claim and in the annual aggregate.

#### United States:

**POLLUTION AND PROFESSIONAL** Liability Policy, which covers US companies up to \$15 million per claim and in the annual aggregate (in some cases, up to \$20 million per claim and in the annual aggregate).

**POLLUTION & REMEDIATION LEGAL LIABILITY POLICY (RCRA - IN, TN AND WI)**, which covers the activity of US companies located in Indiana, Tennessee and Wisconsin with RCRA permits up to \$4 million per claim and \$18 million in the annual aggregate.

**POLLUTION & REMEDIATION LEGAL LIABILITY POLICY (RCRA - CT, NY AND MA)** which covers the activity of US companies located in Connecticut, New York and Massachusetts with RCRA permits up to \$8 million per claim and \$37 million in the annual aggregate.

**POLLUTION & REMEDIATION LEGAL LIABILITY POLICY (NON-RCRA)** which covers the activity of US companies located in non-RCRA-permitted countries up to \$10 million per claim and in the annual aggregate.



As specified in Note 21.1 of Grupo Tradebe Medio Ambiente's consolidated annual report, the group has:

- **provisions for asset decommissioning and environmental provisions** of €55 million (€48.8 million in 2022); and
- **guarantees issued by insurance companies** (closure bonds) in the amount of €24.6 million for those cases where US legislation requires the availability of funds to cover potential environmental contingencies related to the decommissioning of the facilities to be guaranteed (€20.8 million in 2022).

# CIRCULAR ECONOMY AND WASTE MANAGEMENT

# 4.7

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



The following examples are a sample of Tradebe's activities with regard to the circular economy and improved waste management:

## CIRCULAR ECONOMY AT TRADEBE PURIFICATION

The recycling of speciality chemicals clearly contributes to the circular economy, while addressing current supply chain challenges in the chemical sector.

Through processes such as distillation, Tradebe Purification recovers solvents and other ingredients that are either returned to the customer who produced them for reuse or sold back onto the market. This business model is a win-win situation for our customers:

On the one hand, components are reused and recycled, thereby reducing the generation of waste and by-products and, consequently, reducing emissions, promoting sustainability and avoiding the overexploitation of natural resources. On the other hand, it reduces tensions in the supply chain of certain materials, as our customers can reuse their own recycled components without having to resort to external suppliers.

One example of these benefits is the solvent recycling facility that Tradebe Purification has built at its customer's site in Schwarzheide. This facility enables the customer to reuse solvents that would otherwise be destined for disposal. However, with Tradebe's help, the customer can integrate circular economy solutions to reuse the solvents, maximising recycling options, reducing emissions from the disposal of these products and the manufacturing of new virgin products.



## CIRCULAR ECONOMY IN MARITIME TRANSPORT

Since 2015, Tradebe has been researching improvements in MARPOL<sup>10</sup> (maritime waste) transformation processes for its subsequent reuse as fuel.

The MARPOL Convention, together with other EU regulations, obliges port administrations to have port facilities that meet the needs of ships, ensuring the proper management of waste generated from their transport activity.

Tradebe has a port services division with extensive experience in the environmental management of MARPOL waste, whose activity is carried out under the umbrella of a sustainable strategy aligned with the SDGs (in particular, SDG 14 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, by converting the waste into a high-quality product with performance comparable to that of virgin fuel, whilst complying with 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 is also capable of halving energy consumption compared to traditional recovery processes, while contributing to the reduction of CO<sub>2</sub> emissions in terms of the exploitation of traditional fossil fuels.

<sup>10</sup> 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 oil pollution (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 that specialises in regulating shipping.



## ISCC EU AND ISCC PLUS CERTIFICATIONS

Tradebe has **three ISCC Plus-certified facilities** (for Tradebe Green Fuel (TGF) produced from MARPOL waste, Annex I) and **one ISCC EU-certified facility** (for Annex II (X, Y) waste originating from maritime transport and generated during the pre-flushing of tanks transporting products contained in Chapter 17 of the IBC Code).

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 processes of waste from ships**.

With this certification, Tradebe guarantees the control and compliance of collection, storage and production procedures, prioritising environmental performance and customer satisfaction. The ISCC voluntary scheme reinforces the adoption of sustainable practices in daily work, as well as in each of the elements that make up the chain of custody of waste and finished products. Since obtaining this certification, all products made from MARPOL waste are shipped with a recognised Declaration of Sustainability.

After long-term professional experience as a Port Service for the reception of waste from ships and MARPOL cargo waste, this is how Tradebe reaffirms its commitment, which is reflected in a positive impact on both the environment and on our society.

## SUPPORT FOR INITIATIVES THAT PROMOTE CIRCULAR ECONOMY

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





# SUSTAINABLE USE OF RESOURCES<sup>11</sup>

# 4.8

## WASTE MANAGEMENT

**2,1**  
MILLION  
TONNES  
SAFELY  
MANAGED

**37%**  
USED AS  
RAW  
MATERIAL

**28%**  
RECYCLED /  
RECOVERED

**22%**  
ELIMINATED  
INHOUSE

**In 2023, Tradebe's facilities received a total of 2.1 million tonnes of waste (2 million tonnes in 2022).**

**Of the total tonnes received in 2023, 37% was used as raw material** in the recycling, recovery and treatment processes in Tradebe's facilities, therefore avoiding the consumption of virgin raw materials.

**28% of the waste received has been returned to the market in the form of recycled/recovered product or recovered material.** This is significant both from the circular economy perspective, due to the capacity to recycle or recover a resource, as well as the saving in virgin materials it represents and, above all, for the tangible environmental benefit derived from the use of these materials due to the prevention of CO2 emissions being released into the atmosphere.

The materials recycled/recovered at Tradebe mainly include:

### ALTERNATIVE FUEL (ENVIRONMENTAL SERVICES):

- **At the Heysham facility in the UK** 46,695 tonnes of Secondary Liquid Fuel (SLF) were produced (51,683 in 2022). This is an alternative liquid fuel made from a mixture of recycled solvents that is used as an alternative fuel for use in cement kilns.

<sup>11</sup> During the 2023 financial year, Tradebe 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 the alignment with GRI standards and providing useful information to the report user. This is why the data for 2022 may be modified with respect to the previous year's report. Furthermore, the 2022 data has been updated to include Health & Nutrition information, to be comparable with the 2023 data.





- In the **United States**, alternative fuels of various types are produced in different facilities:

**East Chicago and Millington:** 49,145 tonnes of low-grade fuel (alternative liquid fuel used in cement kilns (42,672 tonnes in 2022).

**Saraland:** 39,341 tonnes of Recycled Fuel Oil, produced from the recycling of waste oil (20,891 tonnes in 2022).

**Mobile:** 11,495 tonnes of recycled marine oils and fuels.

- A total of 35,109 tonnes of high-quality marine fuel produced from Marpol waste (35,232 tonnes in 2022) were produced at the **Port of Barcelona and Port of Bilbao facilities (Spain)**.

#### **METAL RECYCLING (ENVIRONMENTAL SERVICES):**

- At the **Amorebieta and Vallbona facilities (Spain)**, 138,011 tonnes of recycled metal, heavy metals and coils were produced in 2023 (146,070 in 2022).

#### **COMPOST AND BIOMASS (ENVIRONMENTAL SERVICES):**

- At the **EDAFO and Jorba facilities (Spain)**, a total of 7,651 tonnes of compost were produced in 2023 (9,725 tonnes in 2022).
- At the **Rock Highland facility (UK)**, 178,113 tonnes (4% more than in 2022) of biomass were produced in 2023, which is used to enrich crop soils as a sustainable alternative to using other raw materials.

#### **SOLVENT PURIFICATION (LIFE SCIENCES | PURIFICATION):**

- Purification facilities have produced 66,942 tonnes of product, achieving an average facility recovery rate of 76%. In other words, more than three quarters of the input is returned to the market as high-purity chemical compounds that can be reused in the production processes of its customers.

Finally, **20% of the waste received is disposed of at Tradebe's own facilities**, either in controlled deposits or in high-temperature thermal treatment facilities, as appropriate, once the options of treatment or transfer to other facilities have been exhausted, and always offering the appropriate treatment according to the waste treated and the regulations in force.

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

Tonnes	2023					
	Total	Spain	United Kingdom	United States	Germany	Italy
<b><u>Inbound waste</u></b>						
Hazardous	892.989	501.099	246.035	122.978	7.449	15.428
Non-hazardous	1.229.804	610.714	274.096	344.994	-	-
<b>TOTAL INBOUND</b>	<b>2.122.793</b>	<b>1.111.813</b>	<b>520.131</b>	<b>467.972</b>	<b>7.449</b>	<b>15.428</b>
<b>Inbound waste used as raw material</b>	784.449	304.660	287.849	169.063	7.449	15.428
<b>% total inbound</b>	<b>37%</b>	<b>27%</b>	<b>55%</b>	<b>36%</b>	<b>100%</b>	<b>100%</b>
High-temperature thermal treatment	43.564	-	43.564	-	-	-
Controlled deposit	377.152	297.123	-	80.029	-	-
<b>Inbound waste eliminated inhouse</b>	<b>420.716</b>	<b>297.123</b>	<b>43.564</b>	<b>80.029</b>	<b>-</b>	<b>-</b>
<b>% total inbound</b>	<b>20%</b>	<b>27%</b>	<b>8%</b>	<b>17%</b>	<b>0%</b>	<b>0%</b>
<b><u>Outbound waste</u></b>						
Recycled/recovered product/material	592.175	191.514	269.491	115.605	5.327	10.239
<b>% total inbound</b>	<b>28%</b>	<b>17%</b>	<b>52%</b>	<b>25%</b>	<b>72%</b>	<b>66%</b>
For valorization	102.685	49.420	38.188	15.062	12	3
<b>% total inbound</b>	<b>5%</b>	<b>4%</b>	<b>7%</b>	<b>3%</b>	<b>0%</b>	<b>0%</b>
For disposal	432.112	226.196	85.778	114.411	1.951	3.776
<b>% total inbound</b>	<b>20%</b>	<b>20%</b>	<b>16%</b>	<b>24%</b>	<b>26%</b>	<b>24%</b>
<b>TOTAL OUTBOUND</b>	<b>1.126.972</b>	<b>467.130</b>	<b>393.457</b>	<b>245.078</b>	<b>7.290</b>	<b>14.018</b>

	2022						
	Tonnes	Total	Spain	United Kingdom	United States	Germany	Italy
<b><u>Inbound waste</u></b>							
Hazardous	888,895	494,030	284,125	87,460	9,364	13,916	
Non-hazardous	1,123,264	601,708	232,443	289,113	-	-	
<b>TOTAL INBOUND</b>	<b>2,012,159</b>	<b>1,095,738</b>	<b>516,568</b>	<b>376,573</b>	<b>9,364</b>	<b>13,916</b>	
<b>Inbound waste used as raw material</b>	754,048	320,653	290,088	120,027	9,364	13,916	
<b>% total inbound</b>	<b>37%</b>	<b>29%</b>	<b>56%</b>	<b>32%</b>	<b>100%</b>	<b>100%</b>	
High-temperature thermal treatment	46,652	-	46,652	-	-	-	
Controlled deposit	392,488	330,998	-	61,490	-	-	
<b>Inbound waste eliminated inhouse</b>	<b>439,140</b>	<b>330,998</b>	<b>43,564</b>	<b>61,490</b>	<b>-</b>	<b>-</b>	
<b>% total inbound</b>	<b>22%</b>	<b>30%</b>	<b>9%</b>	<b>16%</b>	<b>0%</b>	<b>0%</b>	
<b><u>Outbound waste</u></b>							
Recycled/recovered product/material	560,665	203,412	276,037	64,790	6,573	9,853	
<b>% total inbound</b>	<b>28%</b>	<b>19%</b>	<b>53%</b>	<b>17%</b>	<b>70%</b>	<b>71%</b>	
For valorization	76,177	37,251	38,188	8,570	12	1,327	
<b>% total inbound</b>	<b>4%</b>	<b>3%</b>	<b>7%</b>	<b>2%</b>	<b>0%</b>	<b>10%</b>	
For disposal	478,440	223,177	29,017	167,894	2,430	4,732	
<b>% total inbound</b>	<b>24%</b>	<b>20%</b>	<b>6%</b>	<b>45%</b>	<b>26%</b>	<b>34%</b>	
<b>TOTAL OUTBOUND</b>	<b>1,115,282</b>	<b>463,840</b>	<b>385,261</b>	<b>241,254</b>	<b>9,015</b>	<b>15,912</b>	





## ENERGY CONSUMPTION (AND RECOVERY)

**235**  
kWh/t  
ENERGY  
INTENSITY

**51%**  
ENERGY  
SOLD

**63%**  
ALTERNATIVE  
FUELS

### ENERGY INTENSITY:

In 2023, Tradebe consumed 845,590 MWh of energy (831,986 in 2022). If this consumption is compared to the total tonnes of waste input (taking into account both waste input and wastewater input for treatment), **Tradebe's facilities have used, on average, 235 kWh for each tonne of waste received (energy intensity).**

Depending on the type of processes they use, facilities are more or less energy intensive. For example, distillation processes, or those involving high-temperature treatments are, by nature, much more intensive than metal recycling, composting or the recovery of oils and marine fuels.

### ENERGY SALES:

In 2023, certain Tradebe facilities were able to generate and sell 434,367 MWh of energy from waste recovery and recycling, which represents 51% of the amount of energy consumed in the entire organisation (54% in 2022). This energy sale is carried out through:

- **Sale of electricity generated from biogas** (29,412 MWh in 2023; 29,766 MWh in 2022).

Tradebe is the concessionaire of two energy recovery contracts at 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 through combustion engines. This electricity is certified as **renewable energy**, comes with guarantees of origin issued by the **National Markets and Competition Commission (CNMC)** and is transferred to the facilities for consumption.

Approximately 50% of the electricity generated from biogas is sold to Tradebe's facilities in Spain, and the other 50% is sold to the regulated market (NEMO, Nominated Electricity Market Operators).

- **Sale of alternative fuel** (404,955 MWh in 2023; 415,529 in 2022) produced from MARPOL waste (in Spain) and produced from a Secondary Liquid Fuel (SLF) (in the UK).

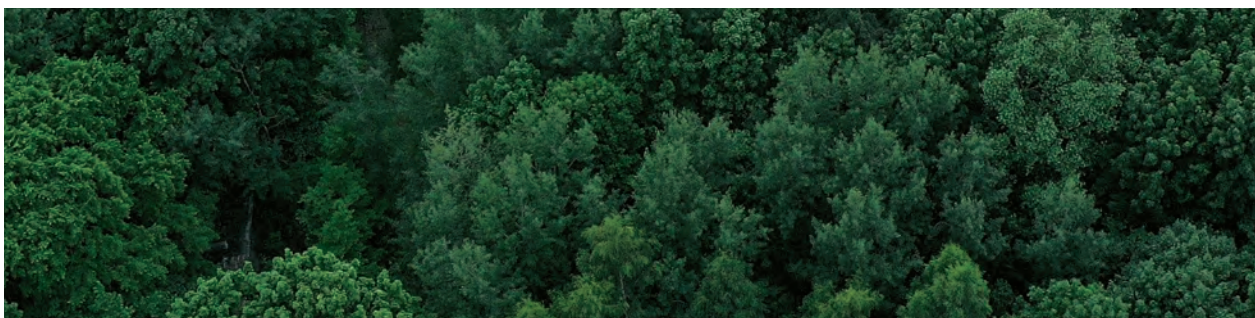
**USE OF ALTERNATIVE FUELS IN FACILITIES:**

In addition to selling alternative fuels to its customers (i.e. cement companies), Tradebe also uses these recycled fuels in its own facilities, wherever possible. In 2023, 63% of fuel consumption from non-renewable sources came from recycled fuels (57% in 2022).

In the case of Norlite (United States), the fuel used to power its rotary kiln is low-grade fuel (LGF), and in the case of Tradebe Purification's facilities in the United Kingdom, they use Product Grade Distillate (PGD), which is a fuel oil that comes from the distillation of fossil fuels to operate their boilers, as a sustainable alternative to the use of traditional fossil fuels.

This is a breakdown of the energy balance by country and by year:

	2023					
	MWh	Total	Spain	United Kingdom	United States	Germany
Gasoil, Diesel and others	106.464	20.084	34.165	52.163	-	52
Natural Gas	161.521	29.994	11.925	108.603	-	10.999
Low-grade fuel	414.405	-	-	414.405	-	-
Product Grade Distillate (PGD)	51.134	-	51.134	-	-	-
<b>Energy from non-renewable sources</b>	<b>733.524</b>	<b>50.078</b>	<b>97.224</b>	<b>575.171</b>	<b>0</b>	<b>11.051</b>
Biogas	29.412	29.412	-	-	-	-
<b>Energy from renewable sources</b>	<b>29.412</b>	<b>29.412</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Electricity	74.446	23.730	22.648	26.006	609	1.453
Steam	7.568	-	-	107	7.461	-
Electricity generated inhouse	640	-	640	-	-	-
<b>Electricity and steam consumption</b>	<b>82.654</b>	<b>23.730</b>	<b>23.288</b>	<b>26.113</b>	<b>8.070</b>	<b>1.453</b>
<b>TOTAL ENERGY CONSUMPTION</b>	<b>845.590</b>	<b>103.220</b>	<b>120.512</b>	<b>601.284</b>	<b>8.070</b>	<b>12.504</b>
Energy sold	434.367	355.774	78.593	-	-	-
<b>% total energy consumption</b>	<b>51%</b>	<b>345%</b>	<b>65%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>
<b>Energy intensity (kWh/t inbound)</b>	<b>235,32</b>	<b>39,97</b>	<b>231,70</b>	<b>1.284,87</b>	<b>1.083,38</b>	<b>810,48</b>



The origin of the electricity consumed is mostly from renewable sources, and in those cases where this is not yet the case, the necessary actions will be taken as soon as possible.

MWh	2022					
	Total	Spain	United Kingdom	United States	Germany	Italy
Gasoil, Diesel and others	121.081	21.941	41.820	57.277	-	43
Natural Gas	180.655	35.149	10.348	122.284	-	12.874
Low-grade fuel	348.462	-	-	348.462	-	-
Product Grade Distillate (PGD)	61.473	-	61.473	-	-	-
<b>Energy from non-renewable sources</b>	<b>711.671</b>	<b>57.090</b>	<b>113.641</b>	<b>528.023</b>	<b>0</b>	<b>12.917</b>
Biogas	29.766	29.766	-	-	-	-
<b>Energy from renewable sources</b>	<b>29.766</b>	<b>29.766</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Electricity	80.538	23.108	23.991	31.281	639	1.519
Steam	9.613	-	-	70	9.543	-
Electricity generated inhouse	398	-	398	-	-	-
<b>Electricity and steam consumption</b>	<b>90.549</b>	<b>23.108</b>	<b>24.389</b>	<b>31.351</b>	<b>10.182</b>	<b>1.519</b>
<b>TOTAL ENERGY CONSUMPTION</b>	<b>831.986</b>	<b>109.964</b>	<b>138.030</b>	<b>559.374</b>	<b>10.182</b>	<b>14.436</b>
Energy sold	445.295	358.423	86.872	-	-	-
<b>% total energy consumption</b>	<b>54%</b>	<b>326%</b>	<b>63%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>
<b>Energy intensity (kWh/t inbound)</b>	<b>233,27</b>	<b>41,79</b>	<b>302,41</b>	<b>1.485.44</b>	<b>1.087.38</b>	<b>1.037.31</b>



## WATER USE AND MANAGEMENT

**0,48m<sup>3</sup>**  
USED PER  
INBOUND TONNE

**53%**  
OF DISCHARGES  
FROM WASTEWATER  
TREATMENT  
FACILITIES

**70%**  
OF WATER  
CONSUMED IN HIGH-  
TEMPERATURE  
THERMAL TREATMENT  
AND DISTILLATION

**Each facility monitors the consumption of natural and artificial resources for proper management, and duly informs the relevant authorities. Whenever possible, the water contained in the waste received from customers is used as raw materials or additives in the group's treatment processes, thus avoiding the use of virgin resources.**

In 2023, 70% of the water used was concentrated in facilities with equipment operating at high temperatures that need water for cooling. This is the case of Fawley (UK), Norlite (US), and Life Sciences' distillation facilities.

53% of the discharged water (clean water returned to the environment) comes from the wastewater treatment facility in Igualada (Spain). 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:

	2023					
	Total	Spain	United Kingdom	United States	Germany	Italy
<b>m<sup>3</sup></b>						
<b>Water consumption</b>	<b>1.011.855</b>	174.247	428.589	395.692	286	13.041
<b>Water received for treatment</b>	<b>1.647.571</b>	1.470.641	100.377	76.553	0	0
<b>Water discharge</b>	<b>2.706.901</b>	1.857.662	374.146	463.967	2.842	8.284
<b>Consumption in m<sup>3</sup>/t inbound</b>	<b>0,48</b>	<b>0,16</b>	<b>0,82</b>	<b>0,85</b>	<b>0,04</b>	<b>0,85</b>

	2022					
	Total	Spain	United Kingdom	United States	Germany	Italy
<b>m<sup>3</sup></b>						
<b>Water consumption</b>	<b>1.064.813</b>	226.607	458.941	363.701	233	15.331
<b>Water received for treatment</b>	<b>1.695.162</b>	1.554.513	113.639	27.010	0	0
<b>Water discharge</b>	<b>2.559.707</b>	1.955.409	308.174	287.922	1.143	7.059
<b>Consumption in m<sup>3</sup>/t inbound</b>	<b>0,53</b>	<b>0,21</b>	<b>0,89</b>	<b>0,97</b>	<b>0,02</b>	<b>1,10</b>

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

# CLIMATE CHANGE AND MANAGEMENT OF OTHER EMISSIONS<sup>12</sup>

**Tradebe is committed to creating a more sustainable planet and making meaningful contributions to people's well-being.**

One of the many examples of this commitment is the commitment of several UK facilities to a **Climate Change Agreement (CCA)**. 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 the pollution that causes climate change on the planet through its actions and is part of the **#PorElClima** Community – a pioneering initiative that brings people, companies, organisations and public administrations together with a common goal. This goal is to become leaders in the fight 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 achieving carbon neutrality by 2050.

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

**USING WATER-SAVING AND EMISSION-CONTROLLING DEVICES**

**PERFORMING PROPER MAINTENANCE OF ENERGY-CONSUMING SYSTEMS**

**MAXIMISING THE EFFICIENCY OF FACILITY ENERGY CONSUMPTION**

**MAXIMISING THE REUSE OF WASTE IN PRODUCTION PROCESSES INSTEAD OF VIRGIN RAW MATERIALS**

In accordance with the provisions of all the Integrated Environmental Authorisations (AAI) granted to the group, the sites have the appropriate work equipment to ensure compliance with the established limits. This is confirmed by the periodic measurements carried out by third parties (bodies collaborating with the Administration).

The emissions resulting from Tradebe's activity, as well as the emissions avoided as a result of this activity, are detailed below.

<sup>12</sup> During the 2023 financial year, Tradebe 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 the alignment with GRI standards and providing useful information to the report user. This is why the data for 2022 may be modified with respect to the previous year's report.

## MANAGEMENT OF EMISSIONS

### GENERATED EMISSIONS

308.905 tCO<sub>2</sub>e  
(Scope 1 & 2)

68%

SCOPE 1 HIGH -  
TEMPERATURE  
THERMAL  
TREATMENT

25%

SCOPE 1  
COMBUSTION

5%

SCOPE 2

### AVOIDED EMISSIONS

467.366 tCO<sub>2</sub>e

### NET EMISSIONS

-158.461 tCO<sub>2</sub>e  
(Generated vs  
avoided)

The main source of Tradebe's emissions are combustion products (CO<sub>2</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, etc.) produced by the steam boilers used in the thermal treatment facilities, which are directly related to the combustion of fuels.

There are strict emission limits and thresholds for thermal treatment facilities and Tradebe has the necessary permits issued by the relevant environmental authorities to comply with these specifications.

**Greenhouse gas (GHG)** emissions are classified as follows:

**DIRECT EMISSIONS (SCOPE 1)**, resulting 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)**, resulting from the company's activities but generated by other third parties, including emissions resulting from the generation of electricity purchased by the company for consumption.

**OTHER EMISSIONS** of nitrogen oxides (NO<sub>x</sub>), sulphur oxides (SO<sub>x</sub>) and particulate matter that also originate from the burning of fossil fuels.

In 2023, Tradebe has generated a carbon footprint equivalent to 308,905 tonnes of CO<sub>2</sub>, as a result of the sum of Scope 1 and Scope 2 emissions.

**The vast majority of input (96%) has an associated carbon footprint, representing only 32% of the total Scope 1 emissions.**

The remaining 68% of Scope 1 emissions come from the unavoidable generation of CO<sub>2</sub> from waste management through high-temperature thermal treatment, which accounts for only 4% of the input.

Electricity consumption accounts for 5% of the carbon footprint (through Scope 2 emissions). This is partly due to Tradebe's efforts to purchase electricity from renewable sources.



The volume of Scope 1 and Scope 2 emissions by source and country, as well as avoided and net emissions, are shown below:

2023						
tCO <sub>2</sub> e	Total	Spain	United Kingdom	United States	Germany	Italy
<b>Scope 1 - Combustion emissions</b>						
Combustion emissions - fleet	16.899	-	6.277	10.622	-	-
Combustion emissions - sites	57.542	18.829	17.421	19.054	-	2.238
<b>TOTAL SCOPE 1 - COMBUSTION</b>	<b>74.441</b>	<b>18.829</b>	<b>23.698</b>	<b>29.676</b>	<b>0</b>	<b>2.238</b>
<b>SCOPE 2 - Electricity</b>	<b>14.104</b>	966	4.705	6.544	1.385	504
<b>SCOPE 1 (Combustion) + SCOPE 2</b>	<b>88.545</b>	<b>19.795</b>	<b>28.403</b>	<b>36.220</b>	<b>1.385</b>	<b>2.742</b>
<b>Scope 1 - Process emissions</b>						
Compost	9.049	9.049	-	-	-	-
High-temperatura treatment	201.285	-	99.701	101.584	-	-
Water treatment	1.191	568	619	4	-	-
Fugitive emissions	8.835	8.835	-	-	-	-
<b>TOTAL PROCESS EMISSIONS</b>	<b>220.360</b>	<b>18.452</b>	<b>100.320</b>	<b>101.588</b>	<b>-</b>	<b>-</b>
<b>TOTAL SCOPE 1 + 2</b>	<b>308.905</b>	<b>38.247</b>	<b>128.723</b>	<b>137.808</b>	<b>1.385</b>	<b>2.742</b>
<b>tCO<sub>2</sub>e/t inbound</b>	<b>0,15</b>	<b>0,03</b>	<b>0,25</b>	<b>0,29</b>	<b>0,19</b>	<b>0,18</b>
<b>Avoided emissions by process</b>						
Metal recycling	301.472	301.472	-	-	-	-
Compost	47.308	47.308	-	-	-	-
Maritime fuel recovery	20.619	20.619	-	-	-	-
Biogas	7.992	7.992	-	-	-	-
Solvent purification	89.975	17.173	41.670	-	7.882	23.250
<b>TOTAL AVOIDED EMISSIONS</b>	<b>467.366</b>	<b>394.564</b>	<b>41.670</b>	<b>0</b>	<b>7.882</b>	<b>23.250</b>
<b>NET EMISSIONS</b>	<b>-158.461</b>	<b>-356.317</b>	<b>87.053</b>	<b>137.808</b>	<b>-6.497</b>	<b>-20.508</b>

		2022				
tCO <sub>2</sub> e	Total	Spain	United Kingdom	United States	Germany	Italy
<b>Scope 1 - Combustion emissions</b>						
Combustion emissions - fleet	16.084	-	6.169	9915	-	-
Combustion emissions - sites	70.249	21.029	21.213	25.393	-	2.614
<b>TOTAL SCOPE 1 - COMBUSTION</b>	<b>86.333</b>	<b>21.029</b>	<b>27.382</b>	<b>35.308</b>	<b>0</b>	<b>2.614</b>
<b>SCOPE 2 - Electricity</b>	<b>17.043</b>	1.084	5.081	8.094	2.257	527
<b>SCOPE 1 (Combustion) + SCOPE 2</b>	<b>103.376</b>	<b>22.113</b>	<b>32.463</b>	<b>43.402</b>	<b>2.257</b>	<b>3.141</b>
<b>Scope 1 - Process emissions</b>						
Compost	8.946	8946	-	-	-	-
High-temperatura treatment	201.607	-	115.644	85.963	-	-
Water treatment	1.053	1.053	-	-	-	-
Fugitive emissions	11.841	11.841	-	-	-	-
<b>TOTAL PROCESS EMISSIONS</b>	<b>223.447</b>	<b>21.840</b>	<b>115.644</b>	<b>85 963</b>	<b>-</b>	<b>-</b>
<b>TOTAL SCOPE 1 + 2</b>	<b>326.823</b>	<b>43.953</b>	<b>148.107</b>	<b>129.365</b>	<b>2.257</b>	<b>3.141</b>
<b>tCO<sub>2</sub>e/t inbound</b>	<b>0,16</b>	<b>0,04</b>	<b>0,25</b>	<b>0,29</b>	<b>0,19</b>	<b>0,18</b>

## SCOPE 3 EMISSIONS

In addition to calculating Scope 1 and 2 emissions, and with the aim of being able to calculate the carbon footprint in the most representative way possible, in order 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 scope of Environmental Services (Spain).

These are Tradebe's indirect responsibility, as they are made up of greenhouse gas emissions from purchased goods and services (classified as upstream) and indirect emissions related to products or services sold (downstream).

Specifically, for the calculation of Scope 3 emissions in 2023, we have considered those emissions associated with:

- the production of electricity and fuel consumption;
- the disposal of waste generated by the company's own operations. Specifically for this first year, and given the lack of emission factors for all the waste generated, only the indirect emissions associated with the treatment of wastewater from Tradebe's facilities have been included;
- emissions from the transportation of employees for business-related activities with vehicles outside the organisation (including air travel, train journeys, hotel stays and car rentals);
- fuel consumption of leased vehicles; and
- the use of recycled marine fuel.

Taking these elements into account, 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 Tradebe Environmental Services' (Spain) Scope 3 emissions amounted to the equivalent of 369,641 tonnes of CO<sub>2</sub> in 2023.

## OTHER EMISSIONS<sup>13</sup>

The emissions of nitrogen oxides (NO<sub>x</sub>), sulphur oxides (SO<sub>x</sub>) and other significant air emissions from the organisation's facilities are detailed below:

		2023					
	TONNES	Total	Spain	United Kingdom	United States	Germany	Italy
	NO <sub>x</sub>	309	4	183	122	-	-
	SO <sub>x</sub>	128	-	2	126	-	-
	Persistent Organic Pollutants (POPs)	0	-	-	-	-	-
	Volatile Organic Compounds (VOCs)	81	-	22	59	-	-
	Hazardous Air Pollutants (HAPs)	2.563	-	-	2.563	-	-
	Particulate Matter (PM)	452	10	3	439	-	-
	Heavy Metals	1	-	1	-	-	-
	Others	1	-	-	-	-	-

<sup>13</sup> The increase in emissions of Hazardous Air Pollutants (HAP) compared to 2022 is due to improvements in the reporting system and data collection during 2023, as explained in the footnote at the beginning of the chapter (footnote 12).



		2022					
	TONNES	Total	Spain	United Kingdom	United States	Germany	Italy
	NOx	296	9	207	75	-	4
	SOx	150	20	3	128	-	-
	Persistent Organic Pollutants (POPs)	0	-	-	0	-	-
	Volatile Organic Compounds (VOCs)	52	1	38	12	-	-
	Hazardous Air Pollutants (HAPs)	16	-	-	16	-	-
	Particulate Matter (PM)	20	14	4	2	-	-
	Heavy Metals	11	-	-	11	-	-
	Others	31	-	-	30	-	-

Volatile Organic Compounds resulting from the organic processes carried out in the chemical treatment facilities (production of chemicals and liquid fuel) are regularly monitored by facility staff to ensure that they do not exceed the emissions permitted by the relevant environmental authorities.

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

## EMISSION AVOIDANCE | CONTRIBUTION TO CARBON FOOTPRINT REDUCTION

The use of recycled products helps to reduce the use of raw materials, making processes such as recovery and recycling key tools in reducing the carbon footprint.

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

In 2023, Tradebe analysed the emission avoidance associated with the tonnes recycled through the solvent recovery activity in the Life Sciences (Purification) business, as well as the marine fuel recycling, composting, metal recovery and biogas-to-energy activities in the Environmental Services business. The conclusion is that:

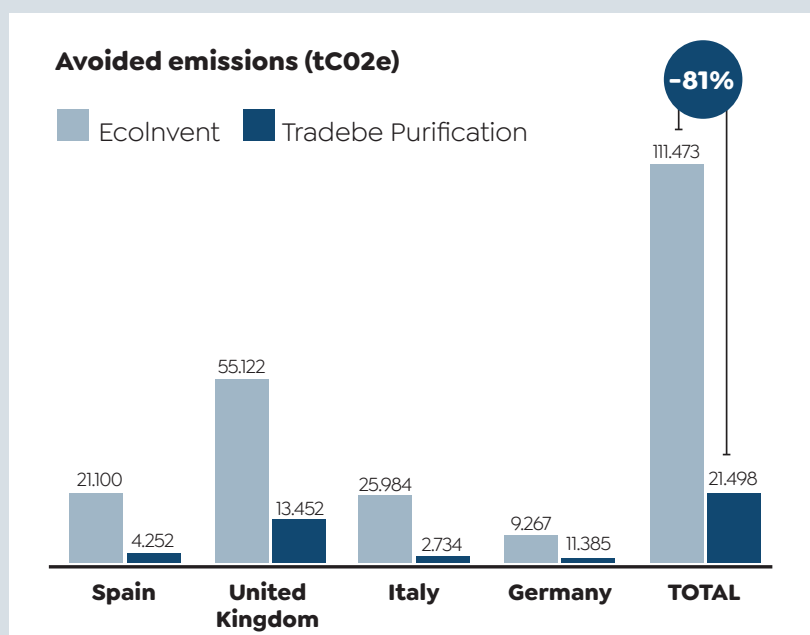
**By 2023, Tradebe's activities have saved 467,366 tonnes of CO<sub>2</sub>, or the CO<sub>2</sub> that would be absorbed by 73,140 hectares of coniferous forest in one year (occupying an area equivalent to 43,797 football fields).**

The emission avoidance from each activity is detailed below:

#### SOLVENT PURIFICATION (LIFE SCIENCES - PURIFICATION):

While solvent purification processes are energy intensive by nature, their recycling (circular economy) provides a much more sustainable alternative to virgin solvent production (linear economy).

On average, solvent recycling, recovery and purification at Tradebe in 2023 **has saved 89,975 tonnes of CO<sub>2</sub> from being released into the atmosphere**. In other words, they have emissions that are **81%** lower than those generated in the production of virgin solvents<sup>16</sup>.



#### IRON AND ALUMINIUM RECYCLING (ENVIRONMENTAL SERVICES):

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

In 2023, Tradebe's facilities in Vallbona and Amorebieta (Spain) recovered a total of 75,356 tonnes of metals (iron, aluminium and stainless steel). Compared to the production of these original materials, Tradebe's activity at these facilities **has saved 300,639 tonnes of CO<sub>2</sub> from being released into the atmosphere** (or the CO<sub>2</sub> absorbed in a year by 47,048 hectares of coniferous forest (about 28,173 football stadiums)).

<sup>14</sup> Data from the project "Economic benefits of the Natura 2000 Network in Spain", promoted and financed by the Ministry of Agriculture, Food and Environment (2015), have been taken as a reference, where it is determined that a coniferous forest (670,190 hectares) captures 6.39 tonnes of CO<sub>2</sub> per year and per hectare.

<sup>15</sup> Taking into account that a football pitch measures 1.67 hectares.

<sup>16</sup> The Ecolinvent database has been used to compare Tradebe Purification's emissions with the industry average.

### COMPOSTING (ENVIRONMENTAL SERVICES):

Tradebe's facilities in Lugo, Valdilecha, Jorba and EDAFO generate compost and sewage sludge that can be used as a substitute for chemical fertilisers. Using the Enterprises pour l'Environnement calculation tool, emissions from compost production and sewage sludge recycling have been found to be 65% and 40% lower, respectively, compared to emissions from the use of chemical fertilisers. In other words, the use of compost and sewage sludge as an alternative to chemical fertilisers **has saved 47,308 tonnes of CO2 from being released into the atmosphere** (or the CO2 absorbed by 7,403 hectares of coniferous forest (about 4,433 football stadiums) in one year).

### MARINE FUEL RECOVERY (ENVIRONMENTAL SERVICES)

If we compare the emissions from the on-site recovery of marine fossil fuels produced at the Port of Barcelona and Bilbao facilities (Spain) with the "Well-to-Tank" (WTT) emissions that would be emitted if fuel extracted by a common process were used, that recovery saves 714.7 kgCO<sub>2</sub>e/tonne. By, applying this factor to the total tonnes of recovered marine fuel produced in 2023, **20,619 tonnes of CO2** (or the CO2 absorbed by 3,227 hectares of coniferous forest (about 1,932 football stadiums) in one year) **emissions were avoided** in 2023.

### BIOGAS USE (ENVIRONMENTAL SERVICES)

Finally, at the facilities in Cordoba and Malaga (Spain), energy recovery is carried out by extracting CH<sub>4</sub> gases. The source of these gases is the controlled deposit, which receive waste with a certain percentage of organic matter. The transformation of the organic fraction of the waste generates biogas which contains methane (50-60%) carbon dioxide (20-30%) and, to a lesser extent, oxygen, VOCs, hydrogen sulphide and water vapour. These gases would naturally go into the atmosphere. However, their extraction to generate electricity with them saved **7,992 tonnes of CO2** (or the CO2 absorbed in a year by 1.25 hectares of coniferous forest (about 749 football stadiums)) **from being released into the atmosphere**.



# 4.10 EFFECTS OF CLIMATE CHANGE

**During 2023, Tradebe carried out an analysis of the risk and opportunities arising from climate change in the company's assets in Spain (facilities, controlled deposits, offices, warehouses and laboratories).**

The following risk categories have been taken into account:

#### PHYSICAL CLIMATE RISKS:

arising from the increasing severity and frequency of extreme weather events or a gradual, long-term change in the global climate. These risks may directly affect the company's assets or alter the viability of its operations.

#### TRANSITION RISKS AND OPPORTUNITIES:

associated with the potential impacts of social, legal and regulatory changes in response to climate change and the transition to a low-carbon economy. These may affect the company's revenues, costs and investments.

## PHYSICAL CLIMATE RISKS

In order to identify the possible climate impacts on the company, the climatic variables that could have the greatest impact on Tradebe's activities were studied: temperature, precipitation, wind, floods, sea level rise, fires and hail.

Once identified, historical data and future projections obtained from official and expert sources, such as the IPCC<sup>17</sup>, were analysed to draw up a scenario known as "business as usual", in which emissions continue to increase as a possible result of inaction to reduce them. In addition, the likelihood of climate impacts and the exposure of Tradebe's assets to them, as well as their vulnerability, were considered.

The results of the study were divided according to the time frame considered in each case: 20 years for the short and medium term, and 50 years for the long term. The following conclusions can be drawn from the study:

**In general, the 39 assets analysed do not present a high criticality to climate risks, with temperature increase being the climate variable with the greatest impact both in the short and medium term (2020-2040) and in the long term (2041-2070). This risk has already been communicated to those responsible for the potentially affected facilities, and the necessary measures are being taken to avoid or reduce its possible adverse effects.**

<sup>17</sup> The IPCC (Intergovernmental Panel on Climate Change) is an intergovernmental panel of climate change experts established in 1988 to facilitate scientific, technical and socio-economic assessments of climate change.

## TRANSITION RISKS AND OPPORTUNITIES

This part of the analysis is based on the current Stated Policies Scenario (STEPS), the Announced Pledges Scenario (APS) and the International Energy Agency's (IEA) Net Zero Emissions by 2050 Scenario. This is important because policies and regulations set by governments can lead to constraints and obligations for companies.



**In terms of current policies, Spain has ratified the Paris Agreement, demonstrating its commitment to reducing emissions, as well as its participation in the EU Emissions Trading System.**

The APS assumes greater obligations for companies to reduce emissions, with increased carbon taxation and increased investment in clean energy, energy efficiency and digitalisation. The Net Zero Emissions by 2050 Scenario also follows this line, albeit in a more restrictive way, with higher emission reduction commitments, a high carbon price and the substitution of the most polluting energies with electricity from renewable sources.

By analysing the implications of these scenarios and their potential financial impact on Tradebe, the following transition risks and opportunities have been identified:

### RISKS:

**Political and legal:** due to increased environmental regulatory requirements for the waste sector and the obligation to reduce emissions and carbon prices

**Resources:** due to the volatility of commodity prices

**Reputational:** due to the risk of litigation in the event of environmental accidents

**Market:** due to changes in demand for carbon-intensive services

### OPPORTUNITIES:

**Market:** due to increased barriers to entry into the sector, the growth of the circular economy and increased demand for services that reduce emissions and improve sustainability

**Technology:** due to the development of technology with a lower environmental impact

**Energy:** due to the energy transition and rising oil prices

In general, the risks and opportunities are expected to be offset, limiting the impact of climate change on the company. Monitoring these issues will be key to identifying those that require the most management attention.

# 4.11

## 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.

In addition, Tradebe's services include environmental consultancy, offered by Tecnoambiente. This activity has its own accredited laboratory and specialises in the provision of marine consultancy services, environmental consultancy (waste characterisation, water inspection, etc.), advice on sustainability and climate change, and studies of natural capital and biodiversity strategies, among others.

Through this activity, Tradebe promotes initiatives that support biodiversity, a specific example of which is the following case.

### THE UNIVERSITY OF BARCELONA AND TECNOAMBIENTE PROMOTE THE CHAIR OF SUSTAINABLE BLUE ECONOMY

More than three billion people depend on marine and coastal biodiversity for their livelihoods, and the market value of marine resources is estimated at 5% of global GDP. At the same time, sectors such as maritime transport, tourism, hydrocarbons, infrastructure, renewable energy and telecommunications are generating significant maritime economic activity, but at a high environmental cost. In turn, the effects of climate change, overfishing, acidification and pollution threaten the conservation of seas and oceans, which are home to vital ecosystems as a source of biodiversity and play a crucial role in climate regulation: they produce oxygen – the true lungs of the planet – absorb carbon dioxide produced by human activity and reduce the impact of global warming.

The University of Barcelona and the environmental consultancy Tecnoambiente have created the **UB Chair in Sustainable Blue Economy** to promote teaching and research in this field and to document economic activity in this sector, with the **aim of promoting the sustainable use of marine and coastal spaces and their natural resources, based on the principles of social justice, the blue economy and ocean equity.**

This new Chair is an excellent opportunity for collaboration between the University of Barcelona and society, and it is hoped that it will facilitate the dissemination of knowledge in society on important issues such as the protection and conservation of marine and coastal ecosystems, the promotion of sustainable economic activities and the responsible use of marine resources.

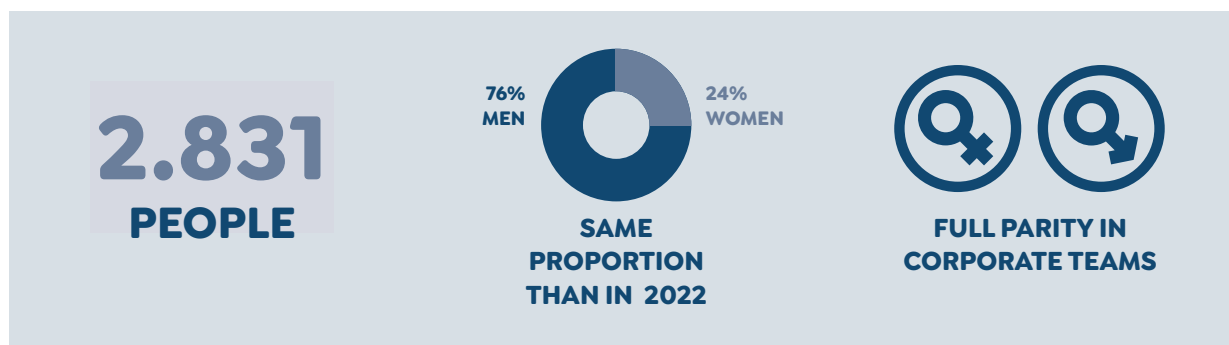




5

SOCIAL  
AND STAFF  
ISSUES

**As at 31 December 2023, Tradebe has a team of 2,831 people (5% more than in 2022), almost a quarter of whom are women.**



# 5.1 MANAGEMENT APPROACH

At Tradebe, we understand that the value of our business lies in our teams so we strive to create and maintain a working environment that fosters dignity and respect throughout our operations. Tradebe's people are a key asset to the development of the business – which is why social and people issues have been considered a material aspect of this Sustainability Report.

We recognise that issues relating to the people who work at Tradebe reach beyond our local boundaries, impacting our organisation as a whole. We are therefore committed to addressing these issues in a comprehensive and sensitive manner, recognising their significant impact on our business and the wider community in which we operate.

In this report, we will take a closer look at the various ways in which Tradebe promotes a fair and inclusive working environment. From the implementation of equal opportunity policies to the creation of career development and wellness programmes.

***We strive to ensure that everyone at Tradebe feels valued, supported and empowered to reach their full potential.***



This internal commitment to people at Tradebe not only reflects our core values, but also aligns with our long-term sustainability vision.

**We are committed to developing a corporate culture that promotes the personal and professional growth of our employees and contributes positively to the sustainable development of our communities and the world at large.**

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 and 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 ACCESSIBILITY FOR PEOPLE WITH DISABILITIES**

**EQUALITY AND DIVERSITY**

The distribution of the workforce by **country, age, gender and professional category** is shown below:

#### DISTRIBUTION OF STAFF BY COUNTRY

	2023		2022	
	Count	%	Count	%
United States	908	32%	860	32%
United Kingdom	862	30%	855	32%
Spain and France	996	35%	923	34%
Oman	0	0%	0	0%
Italy	38	1%	35	1%
Germany	27	1%	21	1%
<b>Total</b>	<b>2.831</b>	<b>100%</b>	<b>2.694</b>	<b>100%</b>

#### DISTRIBUTION OF STAFF BY AGE

	2023		2022	
	Count	%	Count	%
< 30	485	17%	384	14%
>50	926	33%	993	37%
30-39	675	24%	613	23%
40-50	745	26%	704	26%
<b>Total</b>	<b>2.831</b>	<b>100%</b>	<b>2.694</b>	<b>100%</b>

#### DISTRIBUTION OF STAFF BY GENDER AND PROFESSIONAL CATEGORY

	2023											
	Women		Men		Total		Women		Men		Total	
Management	14	2%	46	2%	60	2%	14	2%	42	2%	56	2%
Middle management	121	17%	365	17%	486	17%	132	19%	346	17%	478	18%
Professionals	167	23%	240	11%	407	14%	100	14%	124	6%	224	8%
Technicians	141	19%	270	13%	411	15%	140	20%	333	17%	473	18%
Administration	205	28%	58	3%	263	9%	234	33%	55	3%	289	11%
Production	80	11%	1.124	53%	1.204	43%	81	12%	1.093	55%	1.174	44%
<b>Total</b>	<b>728</b>	<b>100%</b>	<b>2.103</b>	<b>100%</b>	<b>2.831</b>	<b>100%</b>	<b>701</b>	<b>100%</b>	<b>1.993</b>	<b>100%</b>	<b>2.694</b>	<b>100%</b>
<b>Total (%)</b>	<b>26%</b>		<b>74%</b>				<b>26%</b>		<b>74%</b>			



# POLICIES ON SOCIAL AND STAFF ISSUES

# 5.2

With the firm intention of strengthening our corporate identity and further aligning ourselves with our core values, in 2023 we began the transformation exercise of our People & Culture department.

This change is not simply a matter of nomenclature; it is a testament to our unwavering commitment to the well-being and professional development of every individual in our organisation.

We work tirelessly to create an environment where people are not only part of the business but are recognised as our most valuable asset. Through People & Culture, we are driving a more human and people-centred approach in all our initiatives and working practices. This change represents our ongoing commitment to creating a work environment that fosters personal and professional growth, highlighting the fundamental importance of each individual in our business community.

***Our primary commitment is to attract and select the right people, those who can join our collective growth project, and provide them with the necessary support to achieve their professional and personal goals.***

At Tradebe, we are committed to creating a work environment free from discrimination, harassment, bullying and victimisation. We recognise that these undesirable practices are not only unacceptable, but also create a climate of insecurity and underperformance that is detrimental to our working community. In our commitment to integrity and respect, we strive to ensure that all members of our team feel valued, safe and supported in their work environment.

Our **Code of Ethics** reinforces the holistic philosophy and values of our organisation, which are fundamental pillars of our vision and mission. Its main objective is to ensure Tradebe's continued success worldwide by promoting the right behaviour of all our employees.

This code is an integral part of the onboarding process for each new member of our team, providing them with a clear understanding of the core values that guide our company and setting clear expectations for their day-to-day behaviour in the work environment.



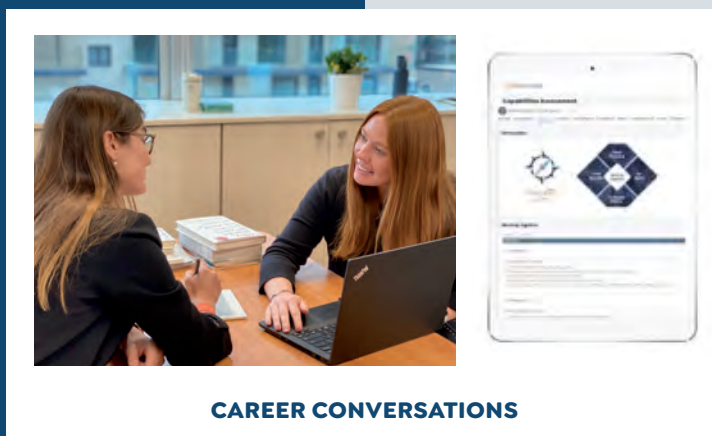
## PERFORMANCE & DEVELOPMENT

**We are fully committed to attracting, developing and retaining talent within our organisation. We recognise that the effective management and continuous development of our teams are fundamental to the successful achievement of the company's strategic objectives. We therefore dedicate resources and efforts to ensuring that each member of our team feels valued, empowered and supported in their growth and development within our organisation.**

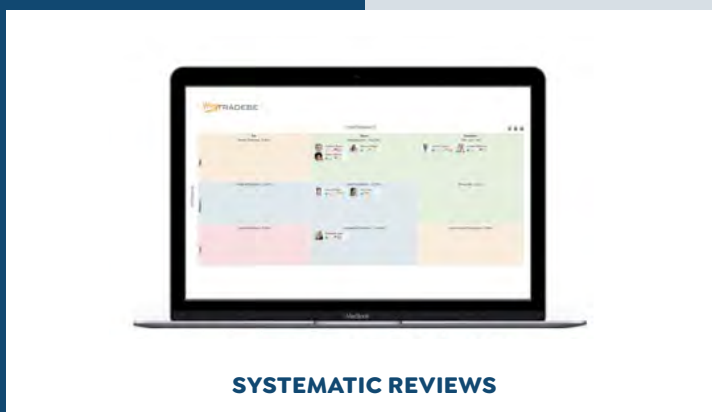
For Tradebe, talent development is much more than a priority: it is our commitment. We are fully committed to our team's professional growth, employability and social awareness.

Our mission is to provide them with the tools and resources they need to expand their knowledge and strengthen their skills, fostering their development and growth, both professionally and personally. At Tradebe, we invest in the future of our team, ensuring a path to success and personal fulfilment.

**CAREER CONVERSATIONS** is the process that helps identify areas of development for Tradebe employees and creates an individualised development plan, not only for the current role, but also with a view to future career growth. In 2023, we consolidated the digitalisation of this process as part of our People digitalisation journey by adding it to our employee portal.



**CAREER CONVERSATIONS**



**SYSTEMATIC REVIEWS**

## PERFORMANCE PROCESS

Our annual process is structured around three key stages:

### GOAL SETTING

We focus on achieving overarching goals that bring us closer to our vision. Each year, we set strategic objectives at corporate, divisional and departmental levels, with the support of managers in setting individual goals. This helps us to prioritise key projects for the year.

### MID-YEAR REVIEW

this is a one-to-one discuss between the manager and the various team members that takes place between July and September. This is where we share progress made towards already established goals, give and receive feedback, and adjust these goals to possible changes that may have occurred since they were first set. We also hold Career Conversations where we analyse the skills of the employees who have been assessed according to their level of responsibility, as well as important aspects such as possible training gaps, geographical mobility, expectations, possible career plans, etc.

### ANNUAL APPRAISAL

this takes place in February of the following year and involves a *one-to-one discussion* between the manager and the employee. This is a crucial time to assess the achievement of individual and company goals, to share feedback and to build confidence in preparation for the new year.

## INTERNAL MOBILITY

We want to encourage cross-disciplinary internal mobility, giving employees the opportunity to better understand the business as a whole.

At the same time, we are increasing our commitment to mobility and professional development, enabling people to work on various projects simultaneously and facilitating temporary moves that contribute to both their personal development and the performance of the organisation.

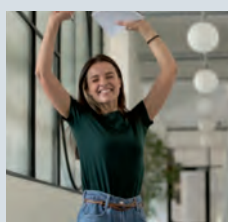
This approach is aligned with our People strategic plan, which commits us to promoting and supporting internal mobility as an integral part of our corporate culture.

Our commitment to internal mobility and growth within the company is reflected through our Job Opportunities Portal and its associated internal mobility process. All vacancies at Tradebe are posted on the portal, giving all Tradebe employees the opportunity to search for vacancies that align with their career path and professional interests.

**In 2023, more than 150 internal moves were made both internationally and functionally across our divisions.**

## CAREER DEVELOPMENT PROGRAMS

We launched this project in 2021 with the aim of identifying and developing promising internal and external talent from the early stages of their careers, offering comprehensive training, mentoring and growth opportunities. It focuses on fostering a strong organisational culture based on values such as teamwork, diversity and continuous learning. The goal is to create leaders in key national and international positions who are committed and have the potential to contribute to the long-term success of the business.



### INTERNSHIP PROGRAM

this programme is key to discovering and nurturing emerging talent, giving young professionals their first foray into the world of work, while building strategic relationships and transformative experiences for the future. During 2023, several local projects were implemented, such as the “Collective adhesion agreement between companies and the UAB”, which allowed us to integrate more than 40 interns into our staff.



### GRADUATE PROGRAM

during 2023, we increased the number of participants in this programme by 50%, of whom 50% were women.



### LEADERSHIP ACCELERATOR PROGRAM

during 2023, we increased the number of participants in this programme by 67%, of whom 40% were women.

## ENGAGEMENT SURVEY – YOU ARE – MAKE TRADEBE

**In 2023, we carried out our first digital Engagement Survey. This initiative aimed to understand our employees and ensure that all voices were heard in order to improve their experience at Tradebe.**

In collaboration with an external company that guaranteed confidentiality, a voluntary and anonymous survey was launched, with a participation rate of 73%. The survey was open to everyone in Environmental Services (Spain, UK, US), Life Sciences and Global.

Once the results were analysed and presented, more than 50 actions were defined and implemented over the course of 2023, both globally and locally, as part of a two-year Action Plan that will continue to be implemented until 2024.

This type of project is an example of our commitment to people as a key driver of our purpose.



# 5.3 WORK ORGANISATION<sup>18</sup>

Working hours and the reconciliation measures in place are regulated by the legal framework of each territory in which the group operates and are defined by the collective bargaining agreements in force.

Caring for our team members in the workplace is of the utmost importance to us. We are firmly committed to fostering a non-discriminatory environment in all aspects of our business. We have mechanisms in place to prevent and address any instances of discrimination, ensuring a safe and inclusive workplace for all. Our working hours are set in accordance with legislation, collective bargaining agreements and individual agreements to best accommodate our valued employees.

The distribution of the workforce by professional category, type of contract, age, gender and type of working day is shown below:

## DISTRIBUTION OF STAFF BY PROFESSIONAL CATEGORY AND TYPE OF CONTRACT

	2023				2022			
	Indef	Temp	Int	Total	Indef	Temp	Int	Total
Management	60	0	0	60	56	0	0	56
Middle management	483	3	0	486	471	6	1	478
Professionals	398	8	1	407	207	11	6	224
Technicians	388	16	7	411	452	14	7	473
Administration	256	5	2	263	283	5	1	289
Production	1.173	29	2	1.204	1.148	24	2	1.174
<b>Total</b>	<b>2.758</b>	<b>61</b>	<b>12</b>	<b>2.831</b>	<b>2.617</b>	<b>60</b>	<b>17</b>	<b>2.694</b>
<b>Total (%)</b>	<b>97%</b>	<b>2%</b>	<b>1%</b>	<b>100%</b>	<b>97%</b>	<b>2%</b>	<b>1%</b>	<b>100%</b>

Indef = Indefinite; Temp = Temporary; Int= Internship and scholarship

<sup>18</sup> During the 2023 financial year, Tradebe implemented improvements in the indicator reporting system, as part of the maturity process and exercise to improve the consistency of this type of information. Whenever possible, the information for 2022 has also been updated (to facilitate comparability) and where this has not been possible, the data has been maintained as reported the previous year.

### DISTRIBUTION OF STAFF BY TYPE OF CONTRACT, AGE AND TYPE OF WORKING DAY

	2023			2022
	F	P	Total	Total
<b>Indefinite</b>	<b>2.679</b>	<b>79</b>	<b>2.758</b>	<b>2.621</b>
< 30	445	4	<b>449</b>	<b>346</b>
30-39	640	20	<b>660</b>	<b>604</b>
40-50	706	28	<b>734</b>	<b>695</b>
>50	888	27	<b>915</b>	<b>976</b>
<b>Temporary</b>	<b>49</b>	<b>12</b>	<b>61</b>	<b>56</b>
< 30	19	5	<b>24</b>	<b>23</b>
30-39	14	1	<b>15</b>	<b>8</b>
40-50	9	2	<b>11</b>	<b>9</b>
>50	7	4	<b>11</b>	<b>16</b>
<b>Internship</b>	<b>3</b>	<b>9</b>	<b>12</b>	<b>17</b>
< 30	3	9	<b>12</b>	<b>15</b>
30-39	0	0	<b>0</b>	<b>1</b>
>50	0	0	<b>0</b>	<b>1</b>
<b>Total</b>	<b>2.731</b>	<b>100</b>	<b>2.831</b>	<b>2.694</b>

### DISTRIBUTION OF STAFF BY TYPE OF CONTRACT AND GENDER

	2023			2022		
	Women	Men	Total	Women	Men	Total
Indef	708	2.050	2.758	676	1.945	2.621
Temp	16	45	61	17	39	56
Int	4	8	12	8	9	17
<b>Total</b>	<b>728</b>	<b>2.103</b>	<b>2.831</b>	<b>701</b>	<b>1.993</b>	<b>2.694</b>

### DISTRIBUTION OF STAFF BY TYPE OF WORKING DAY AND GENDER

	2023			2022		
	Women	Men	Total	Women	Men	Total
Full-time	664	2.067	2.731	640	1.963	2.603
Part-time	64	36	100	61	30	91
<b>Total</b>	<b>728</b>	<b>2.103</b>	<b>2.831</b>	<b>701</b>	<b>1.993</b>	<b>2.694</b>

### DISTRIBUTION OF STAFF BY PROFESSIONAL CATEGORY AND TYPE OF WORKING DAY

	2023			2022		
	Full-time	Part-time	Total	Full-time	Part-time	Total
Management	60	0	60	55	1	56
Middle management	476	10	486	471	7	478
Professionals	382	25	407	214	10	224
Technicians	384	27	411	452	21	473
Administration	244	19	263	255	34	289
Production	1.185	19	1.204	1.156	18	1.174
<b>Total</b>	<b>2.731</b>	<b>100</b>	<b>2.831</b>	<b>2.603</b>	<b>91</b>	<b>2.694</b>

## ABSENCE RATE

The absence rate by country, 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 number of hours worked, is as follows<sup>19</sup>:

### HOURS OF ABSENTISM BY COUNTRY

	Germany	United States	Spain and France	Italy	United Kingdom
<b>2022</b>	2.192	37.664	107.160	1.296	27.440
<b>2023</b>	2.040	34.078	104.984	2.184	46.832

## TERMINATIONS

The number of employee terminations during 2023 and 2022, by age, gender and professional category (all corresponding to permanent contracts), is shown below:

### NUMBER OF TERMINATIONS BY PROFESSIONAL CATEGORY

	2023	2022
Management	1	3
Middle management	33	37
Professionals	18	20
Technicians	37	35
Administration	20	41
Production	161	156
<b>Total</b>	<b>270</b>	<b>292</b>

### NUMBER OF TERMINATIONS BY AGE AND GENDER

	2023			2022		
	Men	Women	Total	Men	Women	Total
< 30	61	1	<b>62</b>	64	19	<b>83</b>
>50	52	6	<b>58</b>	57	13	<b>70</b>
30-39	69	17	<b>86</b>	52	22	<b>74</b>
40-50	49	15	<b>64</b>	48	17	<b>65</b>
<b>Total</b>	<b>231</b>	<b>39</b>	<b>270</b>	<b>221</b>	<b>71</b>	<b>292</b>



<sup>19</sup> The calculation has been made on the basis of absence days, considering eight-hour working days in all cases. The data reported in 2022 has been updated to follow the same criteria as for the year 2023.

# HEALTH AND SAFETY 5.4

***At Tradebe, health and safety is a fundamental part of our corporate strategy and values.***

The **Health & Safety** teams in each business and in each country work every day to ensure safe workplaces, actively manage safety and promote a culture of compliance. All these actions are based on the following philosophy:

**NO HARM OR RISK IS JUSTIFIED**

**ALL ACCIDENTS AND POTENTIALLY HAZARDOUS INCIDENTS ARE PREVENTABLE.**

**SAFETY MUST BE ACTIVELY MANAGED**

In order to reinforce and extend this culture throughout the organisation, Tradebe has various tools at its disposal:

**INTERNAL SAFETY STANDARDS** (policies, procedures, guidelines) that cover higher risk activities and apply to both workers and subcontractors. These activities include, for example, working in confined spaces, handling and managing ignition sources in flammable areas, working at heights, waste energy management, pedestrian/vehicle distances, telephone and/or radio use, exposure to chemicals, etc.

**COLLABORATION WITH INDEPENDENT CONSULTANTS**, experts in occupational safety, to carry out regular health monitoring programmes and activities. In addition to monitoring people's health, these programmes include advice to employees and managers so that controls to prevent possible adverse health effects can be properly identified and implemented.

**OBJECTIVES:** in order to reinforce the value that the company places on people's safety and to foster a culture of responsibility and teamwork, at Tradebe employees have objectives linked to health and safety indicators (including recordable incidents, near misses, number of lost-time accidents, preventive safety observations, etc.).

**TONE AT THE TOP:** Tradebe's management conveys the message that safety is always a priority for both our employees and our partners. Health & Safety is discussed at the beginning of each management meeting and is at the forefront of recurring communications to all employees.



## HEALTH AND SAFETY STATISTICS

In 2023, 320 incidents were reported (**4% less than in 2022**), of which 51% were equipment or facility incidents that did not result in personal injury (53% in 2022), 24% were personal injuries that were resolved with first aid (35% in 2022), and the remaining 25% were incidents reported to the relevant authorities and facility inspections.

Reported incidents include muscle injuries, minor lacerations and falls, among others. **All of them were treated appropriately.**

As a result of the focus on safety, the application of safety standards and as a result of intensive awareness campaigns, 4,291 **Near Misses**<sup>20</sup> were identified and reported internally in 2023 (3,301 in 2022). The existence of reporting and monitoring 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**<sup>21</sup>).

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

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

	2023				
	Germany	United States	Spain and France	Italy	United Kingdom
<b>Total amount of occupational injuries with leave<sup>1</sup></b>	<b>0</b>	<b>7</b>	<b>23</b>	<b>0</b>	<b>3</b>
Women	0	0	0	0	0
Men	0	7	23	0	3
<b>Frecuency rate<sup>2</sup></b>	<b>0</b>	<b>5,20</b>	<b>13,37</b>	<b>0</b>	<b>1,72</b>
Women	0	0	0	0	0
Men	0	6,89	19,89	0	2,13
<b>Gravity rate<sup>3</sup></b>	<b>0</b>	<b>0,18</b>	<b>0,65</b>	<b>0</b>	<b>0,02</b>
Women	0	0	0	0	0
Men	0	0,24	0,97	0	0,02

<sup>1</sup>Excluding fatalities and accidents in itinere

<sup>2</sup>Calculated as: (number of occupational injuries with leave excluding in itinere / number of hours worked) \* 106

<sup>3</sup>Calculated as: (number of lost days due to occupational injuries with leave excluding in itinere / number of hours worked) \* 103

In 2023, there were a total of 33 accidents with sick leave, all of which involved men. On the other hand, there were no occupational illnesses or deaths due to recordable occupational accidents.

<sup>20</sup> For the purposes of this report, ‘Near Misses’ are those abnormal events that occur abruptly and unexpectedly, interrupt the normal course of work, and which, if they had not occurred by chance or been identified and managed in time, would have resulted in foreseeable injury or damage to the facilities.

<sup>21</sup> Based on “Bird’s Pyramid” or accident theory (Frank E. Bird, 1969).

In 2023, the process of reporting accident data has been improved, enabling the breakdown of each variable by gender, and the calculation of the severity index has been added. In order to calculate the frequency and severity rates on the basis of the same data, in 2023 these rates only take into account accidents with sick leave, as these are the most important. These improvements could not be applied retroactively in 2022, so the data are not comparable between years.

	2022				
	Germany	United States	Spain and France	Italy	United Kingdom
Number of fatalities due to occupational injury	0	0	0	0	0
Total amount of occupational injuries with leave <sup>1</sup>	0	14	25	0	4
Frequency rate <sup>2</sup>	0	6,93	26,41	0	3,22

<sup>1</sup> Excluding fatalities and accidents in itinere

<sup>2</sup> Calculated as: (number of occupational injuries with leave excluding in itinere / number of hours worked)\* 10<sup>6</sup>

## WELL-BEING IS ALSO WELL-WORKING – WE CHOOSE TO LIVE BETTER!

At Tradebe we care about people and their well-being, and we promote a culture of well-being that includes physical, mental and emotional aspects.

In 2022, the SHEQ<sup>22</sup> Spain Environmental Services department, together with experts from MAPFRE, launched an online information and training initiative on healthy lifestyles. This initiative was extended with more sessions in 2023, as it has proven to have a significant impact on the general well-being of our staff.

Tradebe plays a key role in providing resources and support, but personal commitment and dedication are key to cultivating and maintaining well-being at work and home.

In addition to the Code of Ethics, several divisions within the group have some of the following welfare policies:

**ALCOHOL AND DRUGS POLICY**

**STRESS MANAGEMENT POLICY**

**HOLIDAY POLICY**

**NON-SMOKING AND ELECTRONIC CIGARETTE POLICY**



<sup>22</sup> The acronym SHEQ stands for Safety, Health, Environment and Quality.

# 5.5 SOCIAL RELATIONS

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

## SPAIN

In Spain, 98% of employees are covered by collective bargaining agreements where social dialogue is carried out through the workers' legal representation in each company, which takes the form of company delegates or committees.

## UNITED STATES

In the United States, Tradebe works with the unions under five different labour contracts. Tradebe negotiates each labour contract with the different unions, each with its own rules and agreements. In general, labour contracts are negotiated for a period of three years, but this can be changed if both parties agree. Additional negotiations can also take place if specific issues need to be addressed.

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 other two the payment of membership fees is voluntary.

## ITALY

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

The Federation of Chemical Industry Companies (FEDERCHIMICA, FARMAINDUSTRIA) negotiates the general conditions of the collective bargaining agreement with the trade unions within three to four years. It is currently in force between 2022 and 2025. These conditions apply to all Tradebe employees. Negotiations within the company are carried out by the works councils with the support of a trade union representative.

## UNITED KINGDOM

Social dialogue in the UK and Germany is slightly different. In the case of Germany, there is no collective bargaining agreement, while in the UK there are no collective bargaining agreements, but there is a trade union at the Scotoil facility, and there are employees at other facilities (Inutec and Fawley) who are union members.

# TRAINING

# 5.6

Tradebe's management believes that training is crucial to improving people's skills and knowledge, which contributes to their professional and personal development. It also fosters innovation, adaptability and team productivity by aligning skills with organisational needs and objectives. Training is also very important for the people who work with us, strengthening their loyalty and commitment and

fostering a positive working environment that contributes to the sustainable growth of the company.

In 2023, we delivered 36,849 hours of training, increasing our skills training by 300%. We also delivered more than 16,000 hours of health and safety training to strengthen one of our core values and priorities: a safe working environment for all.

## HOURS OF TRAINING BY PROFESSIONAL CATEGORY AND CONTENT

2023						
	Health and safety	Languages	Professional	Social skills	Technical training	Total
Management	162	420	0	420	108	<b>1.110</b>
Middle management	2.511	2.360	246	4.888	380	<b>10.386</b>
Professionals	1.603	2.834	144	1.665	1.009	<b>7.255</b>
Technicians	2.930	635	259	72	735	<b>4.631</b>
Administration	1.035	274	0	325	410	<b>2.044</b>
Production	8.572	1.090	952	36	767	<b>11.417</b>
<b>Total</b>	<b>16.813</b>	<b>7.613</b>	<b>1.601</b>	<b>7.407</b>	<b>3.409</b>	<b>36.843</b>

2022						
	Health and safety	Languages	Professional	Social skills	Technical training	Total
Management	85	410	0	10	136	<b>641</b>
Middle management	3.403	3.725	188	1.117	382	<b>8.815</b>
Professionals	1.550	1.965	336	266	691	<b>4.808</b>
Technicians	4.503	868	41	434	349	<b>6.195</b>
Administration	1.260	1.020	56	123	245	<b>2.704</b>
Production	9.854	210	807	266	493	<b>11.630</b>
<b>Total</b>	<b>20.655</b>	<b>8.198</b>	<b>1.428</b>	<b>2.216</b>	<b>2.296</b>	<b>34.793</b>



The significant increase we have experienced is due to our initiative to expand our training offering through the creation of the Tradebe Learning Academy. This effort has led to the addition of new programmes such as the Leadership Development Programme and the launch of our e-learning Academy.

In addition, we have increased the variety of courses offered and optimised our data collection systems through digitalisation, which has improved the efficiency and accuracy of our processes.

The key training initiatives for 2023 are explained in more detail below:

## LEADING THE WAY 2.0 – LEADERSHIP & MANAGEMENT SKILLS

TRADEBE

**LEADING**  
The Way



This Leadership Development Programme is designed to equip our managers with the knowledge, tools and attitudes they need to succeed. Over the next few years, our managers will develop their strategic thinking, communication and collaboration skills, as well as their coaching and feedback skills, to prepare themselves to lead the necessary change and development associated with organisational growth.

In 2023, **more than 175 managers** in different countries started this programme by participating in face-to-face training sessions, complemented by online training using our e-learning Academy.

## ONBOARDING

We recognise the importance of integrating new members into our team. We have therefore continued to invest in improving the onboarding experience for all new employees at Tradebe through the **Onboarding Experience** process.

In 2023, we implemented a global Onboarding e-learning module for all new employees, complemented by localised modules adapted to each country. At the same time, we continue to adapt this process to the various roles within our organisation, ensuring that the experience for new employees is more complete and satisfying. Our goal is to facilitate a smooth and successful transition to encourage the engagement and retention of talent in the organisation.

## KNOWLEDGE TRANSFER

It is vital that we are able to transfer the internal knowledge of our experts and to ensure that this knowledge is retained during transition.

With this in mind, we have initiated our commitment to develop courses and other internal training materials to ensure the successful transfer of knowledge.

In 2023, we started to transfer knowledge of our procedures by launching the **SAP Academy**: internal e-learning training that ensures the transfer of procedures and SAP knowledge between all Tradebe divisions and regions.

## CYBERSECURITY

Rapid advances in information technology and equally rapid innovations by cybercriminals mean that employees and other end users need regular and targeted training to stay safe online and protect their information and that of their employers.

We see cybersecurity training and awareness as a way to ensure that users understand and follow certain practices to help keep our organisation safe. **In 2023, eight training modules were launched that improve users' cybersecurity by learning best practices.**

# UNIVERSAL ACCESSIBILITY FOR PEOPLE WITH DISABILITIES



At Tradebe, we are committed to ensuring equal opportunities and a working environment free from discrimination on the grounds of age, race, nationality, ethnicity, gender, religion, sexual orientation or disability, in accordance with the law.

We monitor accessibility in all our facilities to ensure that we always comply with current regulations. If needs are identified, we take action to remove barriers where the nature of the sector allows.

***Aware of the importance of integrating people with functional diversity, in 2023 our global workforce consisted of 61 people with recognised disabilities in some of the countries where Tradebe operates, an increase of 15% compared to 2022.***

# 5.8 EQUALITY

We are firmly committed to our Code of Ethics and will continue to promote equality at all levels and in all aspects of the professional lives of those at Tradebe. In 2023, we continued to develop our Equality Plan for the different facilities in Spain, with the aim of ensuring compliance with the provisions established in Royal Decree 901/2020.

At Tradebe, we advocate freedom of expression and respect for diversity. We work to create an inclusive environment where individuality is celebrated and mutual respect is encouraged, regardless of age, race, nationality, ethnicity, gender, religion, sexual orientation or disability. We promote a culture of respect and trust and strongly discourage any behaviour that threatens the harmony and diversity we value within our community.

At Tradebe, diversity and inclusion are fundamental to our culture. That's why we ensure an unbiased recruitment process that provides equal opportunities for all, regardless of age, race, nationality, ethnicity, gender, religion, sexual orientation or disability. With more than 39 nationalities represented around the world, we value diversity as an enriching asset to our organisation.

We are committed to continuously improving our selection processes to ensure objectivity and fairness in recruitment, based on the merits and abilities of each individual, always seeking the person's suitability for the position.



## INTERNATIONAL WOMEN'S DAY

On 8 March, International Women's Day is celebrated worldwide to fight for women's equality, participation and empowerment. Once again, we at Tradebe wanted to celebrate this day in a very special way.



We “put on our caps” as a sign of our support for a world with gender equality. A world free from prejudice, stereotypes and discrimination. A world that is diverse, fair and inclusive. A world where differences are valued and celebrated.



# INTERGENERATIONAL DIVERSITY

50% of our workforce is aged under 30 and over 50 years, promoting generational diversity with the aim of enriching our organisational culture and fostering an inclusive environment.

Working groups of different ages provide a variety of perspectives and experiences, encouraging innovation and creativity in problem solving. They also facilitate knowledge transfer between generations, with older employees sharing their invaluable know-how and younger employees contributing new ideas and other innovative skills.

This interaction fosters a positive working environment based on mutual respect and understanding, which improves collaboration and productivity.

In a dynamic business environment such as ours, intergenerational diversity strengthens Tradebe's adaptability and flexibility, enabling it to respond effectively to market changes and customer demands.

**In recognition of our work, Newsweek, a news magazine published in New York and distributed in the United States, included Tradebe on two of its lists in 2023: the best places to work for diversity and the best places to start to work, in the United States.**



# 5.10

## PAY GAP

In determining annual remuneration, the applicable collective bargaining agreements are considered, along with the growth of the company and each employee's individual performance, while always respecting the

minimum wage established by local law and regulations. Disparities in the standard of living in the different countries in which we operate may positively or negatively affect the averages by category.

In 2023, the average remuneration by professional category, taking into account the different geographical areas and their currencies, was as follows:

### AVERAGE REMUNERATION BY PROFESSIONAL CATEGORY, GENDER AND AGE (EUR/year) (Germany, France, Spain and Italy)

	2023					2022				
	< 30	30-39	40-50	>50	Total	< 30	30-39	40-50	>50	Total
<b>Middle management</b>	<b>41.407 €</b>	<b>56.285 €</b>	<b>63.264 €</b>	<b>62.101 €</b>	<b>61.386 €</b>	<b>28.158 €</b>	<b>54.774 €</b>	<b>58.287 €</b>	<b>61.414 €</b>	<b>57.866 €</b>
Women	0 €	51.111 €	55.918 €	57.237 €	<b>55.228 €</b>	24.100 €	53.463 €	48.562 €	51.667 €	<b>48.434 €</b>
Men	41.407 €	59.552 €	67.171 €	63.869 €	<b>64.326 €</b>	34.244 €	56.172 €	65.905 €	68.132 €	<b>63.002 €</b>
<b>Professionals</b>	<b>26.740 €</b>	<b>42.535 €</b>	<b>37.222 €</b>	<b>45.769 €</b>	<b>37.982 €</b>	<b>22.591 €</b>	<b>38.821 €</b>	<b>38.572 €</b>	<b>50.686 €</b>	<b>35.858 €</b>
Women	25.213 €	39.801 €	34.863 €	41.344 €	<b>34.695 €</b>	21.151 €	36.618 €	33.757 €	56.087 €	<b>33.123 €</b>
Men	28.692 €	44.565 €	40.607 €	48.893 €	<b>41.305 €</b>	24.301 €	40.586 €	40.853 €	46.745 €	<b>38.073 €</b>
<b>Technicians</b>	<b>20.754 €</b>	<b>33.615 €</b>	<b>40.211 €</b>	<b>41.524 €</b>	<b>34.063 €</b>	<b>18.402 €</b>	<b>26.489 €</b>	<b>33.711 €</b>	<b>43.102 €</b>	<b>34.973 €</b>
Women	20.784 €	37.801 €	44.049 €	40.680 €	<b>36.780 €</b>	19.246 €	24.104 €	31.161 €	46.965 €	<b>36.666 €</b>
Men	20.731 €	29.230 €	36.258 €	42.421 €	<b>31.431 €</b>	17.277 €	28.120 €	35.928 €	38.637 €	<b>33.331 €</b>
<b>Administration</b>	<b>16.440 €</b>	<b>27.903 €</b>	<b>26.103 €</b>	<b>30.190 €</b>	<b>26.012 €</b>	<b>25.712 €</b>	<b>24.185 €</b>	<b>26.657 €</b>	<b>27.620 €</b>	<b>26.408 €</b>
Women	14.346 €	28.056 €	25.382 €	27.796 €	<b>26.607 €</b>	21.010 €	24.637 €	26.853 €	30.121 €	<b>27.117 €</b>
Men	16.905 €	27.656 €	28.267 €	31.275 €	<b>24.987 €</b>	30.415 €	22.829 €	27.311 €	18.783 €	<b>22.955 €</b>
<b>Production</b>	<b>23.085 €</b>	<b>26.163 €</b>	<b>27.173 €</b>	<b>27.086 €</b>	<b>26.535 €</b>	<b>21.360 €</b>	<b>24.025 €</b>	<b>25.791 €</b>	<b>25.315 €</b>	<b>25.032 €</b>
Women	22.892 €	27.345 €	32.798 €	24.549 €	<b>27.088 €</b>	8.320 €	24.617 €	39.023 €	22.148 €	<b>22.315 €</b>
Men	23.096 €	26.051 €	26.727 €	27.499 €	<b>26.475 €</b>	23.014 €	24.023 €	26.001 €	26.049 €	<b>25.287 €</b>





### AVERAGE REMUNERATION BY PROFESSIONAL CATEGORY, GENDER AND AGE (GBP/year) (United Kingdom)

	2023					2022				
	< 30	30-39	40-50	>50	Total	< 30	30-39	40-50	>50	Total
<b>Middle management</b>	<b>£36.606</b>	<b>£48.347</b>	<b>£54.067</b>	<b>£63.037</b>	<b>£55.509</b>	<b>£35.773</b>	<b>£53.249</b>	<b>£58.935</b>	<b>£63.437</b>	<b>£57.842</b>
Women	£36.924	£51.307	£46.352	£59.280	<b>£48.341</b>	£30.763	£53.415	£58.118	£63.604	<b>£55.903</b>
Men	£36.182	£47.469	£55.781	£63.461	<b>£57.145</b>	£37.443	£53.155	£59.257	£63.409	<b>£58.464</b>
<b>Professionals</b>	<b>£39.638</b>	<b>£48.066</b>	<b>£48.841</b>	<b>£50.333</b>	<b>£47.920</b>	<b>£38.948</b>	<b>£43.014</b>	<b>£53.315</b>	<b>£55.126</b>	<b>£49.501</b>
Women	£36.927	£46.941	£44.990	£45.833	<b>£45.137</b>	£40.345	£33.075	£50.454	£47.683	<b>£44.323</b>
Men	£40.377	£48.840	£52.049	£51.730	<b>£49.270</b>	£38.150	£49.641	£54.746	£60.278	<b>£52.666</b>
<b>Technicians</b>	<b>£29.113</b>	<b>£32.799</b>	<b>£34.391</b>	<b>£33.667</b>	<b>£31.349</b>	<b>£29.529</b>	<b>£33.783</b>	<b>£33.810</b>	<b>£34.015</b>	<b>£31.934</b>
Women	£28.003	£0	£32.164	£39.207	<b>£29.901</b>	£29.245	£39.533	£31.616	£35.370	<b>£32.416</b>
Men	£29.520	£32.799	£34.670	£33.015	<b>£31.643</b>	£29.607	£33.144	£34.541	£33.338	<b>£31.796</b>
<b>Administration</b>	<b>£25.749</b>	<b>£25.377</b>	<b>£27.288</b>	<b>£26.891</b>	<b>£26.402</b>	<b>£24.157</b>	<b>£26.133</b>	<b>£26.555</b>	<b>£25.120</b>	<b>£25.522</b>
Women	£25.833	£24.935	£27.785	£27.093	<b>£26.588</b>	£24.183	£25.175	£27.602	£24.818	<b>£25.086</b>
Men	£25.437	£25.945	£25.963	£25.780	<b>£25.797</b>	£24.000	£27.837	£25.509	£26.327	<b>£26.639</b>
<b>Production</b>	<b>£27.290</b>	<b>£30.589</b>	<b>£28.849</b>	<b>£29.481</b>	<b>£29.176</b>	<b>£25.984</b>	<b>£26.939</b>	<b>£29.375</b>	<b>£28.630</b>	<b>£27.955</b>
Women	£30.333	£32.891	£29.750	£24.584	<b>£29.774</b>	£26.814	£26.904	£28.673	£24.986	<b>£26.849</b>
Men	£27.207	£30.356	£28.802	£29.645	<b>£29.146</b>	£25.882	£26.942	£29.426	£28.768	<b>£28.033</b>



**AVERAGE REMUNERATION BY PROFESSIONAL CATEGORY, GENDER AND AGE  
(USD/year) (United States)**

	2023					2022				
	< 30	30-39	40-50	>50	Total	< 30	30-39	40-50	>50	Total
<b>Middle management</b>	<b>\$94.897</b>	<b>\$101.514</b>	<b>\$117.468</b>	<b>\$128.267</b>	<b>\$116.181</b>	<b>\$84.222</b>	<b>\$95.079</b>	<b>\$110.913</b>	<b>\$119.166</b>	<b>\$108.367</b>
Women	\$94.783	\$101.937	\$100.756	\$105.516	<b>\$101.381</b>	\$87.741	\$90.649	\$96.306	\$104.700	<b>\$94.983</b>
Men	\$94.988	\$101.331	\$124.051	\$131.887	<b>\$120.974</b>	\$80.703	\$97.294	\$114.990	\$121.521	<b>\$112.513</b>
<b>Professionals</b>	<b>\$66.298</b>	<b>\$82.034</b>	<b>\$88.998</b>	<b>\$94.052</b>	<b>\$84.315</b>	<b>\$60.258</b>	<b>\$74.768</b>	<b>\$96.388</b>	<b>\$98.654</b>	<b>\$80.258</b>
Women	\$64.336	\$74.561	\$82.750	\$87.241	<b>\$75.044</b>	\$59.598	\$62.846	\$99.820	\$87.254	<b>\$75.179</b>
Men	\$69.044	\$85.283	\$94.620	\$95.376	<b>\$89.009</b>	\$61.181	\$82.716	\$90.668	\$114.613	<b>\$85.743</b>
<b>Technicians</b>	<b>\$52.289</b>	<b>\$53.021</b>	<b>\$53.678</b>	<b>\$59.449</b>	<b>\$54.291</b>	<b>\$52.445</b>	<b>\$60.527</b>	<b>\$63.267</b>	<b>\$73.064</b>	<b>\$63.561</b>
Women	\$52.311	\$57.095	\$67.960	\$58.511	<b>\$54.924</b>	\$45.636	\$56.410	\$61.073	\$87.366	<b>\$56.359</b>
Men	\$52.277	\$52.293	\$50.107	\$59.616	<b>\$54.091</b>	\$54.047	\$60.972	\$63.816	\$72.595	<b>\$64.462</b>
<b>Administration</b>	<b>\$40.366</b>	<b>\$45.505</b>	<b>\$46.145</b>	<b>\$47.434</b>	<b>\$45.778</b>	<b>\$42.263</b>	<b>\$45.569</b>	<b>\$46.447</b>	<b>\$48.815</b>	<b>\$46.699</b>
Women	\$39.219	\$45.141	\$46.513	\$47.324	<b>\$45.723</b>	\$42.457	\$43.837	\$45.762	\$45.834	<b>\$44.985</b>
Men	\$46.670	\$46.741	\$38.043	\$51.859	<b>\$46.327</b>	\$41.100	\$52.494	\$55.361	\$65.424	<b>\$57.085</b>
<b>Production</b>	<b>\$45.612</b>	<b>\$50.144</b>	<b>\$53.219</b>	<b>\$55.098</b>	<b>\$51.443</b>	<b>\$42.969</b>	<b>\$47.407</b>	<b>\$49.612</b>	<b>\$51.261</b>	<b>\$48.077</b>
Women	\$46.792	\$47.011	\$45.795	\$52.000	<b>\$47.023</b>	\$42.905	\$40.617	\$46.176	\$43.618	<b>\$42.388</b>
Men	\$45.526	\$50.495	\$53.498	\$55.124	<b>\$51.690</b>	\$42.976	\$47.997	\$49.695	\$51.414	<b>\$48.409</b>

The pay gap for the consolidated scope is 5.9%. In other words, taking into account the basic salary and the variable salary of all professional categories, and converting the amounts to euros, men in Tradebe are paid 5.9% more than women.

With regard to management, the average remuneration per territory in local currency is as follows:

#### AVERAGE MANAGEMENT REMUNERATION

	2023			2022		
	Women	Men	Average	Women	Men	Average
Europe (EUR)	133.896 €	150.140 €	146.350 €	117.650 €	144.181 €	135.623 €
United Kingdom (GBP)	£129.750	£147.925	£144.896	£108.750	£159.015	£154.826
United States (USD)	\$357.122	\$298.107	\$314.500	\$424.133	\$282.798	\$315.414





CYBERSECURITY



# 6.1 MANAGEMENT APPROACH

Given the significant growth of digitalisation and, consequently, of cybersecurity threats, Tradebe is committed to the effective management of system and information security, with the aim of protecting the company's information from possible threats, minimising risks and guaranteeing the continuity of business processes by promoting the application of the following pillars:



As stated in the materiality analysis (see section 1.2), this is one of the priority factors to be considered by the company, which works to mitigate the following risks:

- Possibility of a cyberattack
- Loss of efficiency and competitiveness due to a lack of digitalisation





## 6

.2  
CYBERSECURITY  
POLICIES  
AND  
PROCEDURES

In order to make progress in this area, a **Global IT Security Manager** was appointed, as well as a **Cybersecurity Committee**, and a **Security and Information Management Policy** was drawn up. The procedures and standards established to properly manage the company's systems and information are based on ISO 27002 best practices and NIST (National Institute of Standards and Technology) guidelines.

**Given that Tradebe's staff are the first line of defence against any cyberattack, the focus has been on raising awareness and training teams to identify and act on an attempted cyberattack.**

Some of the training modules cover topics such as how to protect against malware, phishing and social engineering. The initiative also includes simulated attacks to test the level of understanding of these concepts. Another layer of protection is provided by an SOC (Security Operations Centre), which is designed to detect, analyse and neutralise any possible threat, thereby increasing security across the company.





**AWARENESS  
TRAINING**

**DETECTION  
PROTECTION**

**SECURE  
ACCESS**

**INFORMATION MANAGEMENT AND SECURITY POLICY**

**SOC (SECURITY OPERATIONS CENTRE)**

**In recent years, the investment of economic and human resources allocated to this area has increased exponentially, a trend that will continue in the coming year, demonstrating Tradebe's commitment to the continuous improvement of information security and the integrity of its IT systems.**



7

HUMAN  
RIGHTS



# 7.1 MANAGEMENT APPROACH

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

**Tradebe follows the United Nations Global Compact with regard to respect for human rights, as well as the Universal Declaration of Human Rights, the core labour conventions of the International Labour Organisation (ILO) and the OECD guidelines for multinational companies.**

As stated in the Code of Ethics, all of Tradebe's activities are carried out with respect for human rights and civil liberties, in accordance with internationally accepted laws and practices. 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 in data protection legislation.

Tradebe implements measures to ensure compliance with the labour standards contained in the ILO Core Conventions and will not tolerate any malpractice, either among the companies that make up the group or among those that collaborate with it.

Furthermore, Tradebe will at all times ensure strict compliance with labour regulations and will only employ people who are legally permitted to work.



As a result of the equality policies and plans and the application of its Code of Ethics, Tradebe has an inclusive culture and there is no evidence of non-compliance with human rights, either by its employees or in its supply chain. These policies aim to mitigate the risks of non-compliance with human rights in any form, as well as with human rights regulations..

**The organisation manages these risks through the policies described above, which are regularly reviewed by the Management Committee, and through specific training.**

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 (UK 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 issue. To this end, robust practices are in place to combat slavery and human trafficking both within the organisation and throughout its supply chain.



# IMPLEMENTATION OF HUMAN RIGHTS DUE DILIGENCE PROCEDURES

# 7.2

Policies, procedures and measures to prevent and manage potential human rights violations are managed and promoted by the People & Culture team in coordination with the Executive Committee and the Compliance and Business Ethics Committee (all involved are qualified personnel).

**The People & Culture team works closely with operations and business managers, providing them with the tools and guidance to manage human rights issues and ensure compliance with local legislation.**

At the time of publication of this report, no reports of human rights violations have been received and no violations have been detected by internal control mechanisms.







# FIGHT AGAINST CORRUPTION AND BRIBERY



# 8.1 MANAGEMENT APPROACH

**Tradebe has a strong commitment and obligation to fight corruption and bribery in all aspects and areas of the organisation. This principle is considered fundamental and has therefore been included as a material aspect of this Sustainability Report.**

The organisation has a channel for reporting potential irregularities and legal breaches (Ethics Channel), which complies with the requirements of Law 2/2023, of 20 February, on the protection of persons reporting breaches of regulations and the fight against corruption.





# 8.2

## GROUP POLICIES ON ANTI-CORRUPTION AND BRIBERY

The group's anti-corruption and anti-bribery policies are divided into three main areas:

### CODE OF ETHICS AND INTERNAL POLICIES

Tradebe's commitment to strict compliance with the regulations on the prevention and fight against corruption, bribery and any other related matter is clear and unequivocal, with a zero-tolerance policy for non-compliance at all times. The ultimate aim of the organisation is to develop and continuously improve the guiding principles set out in the group's Code of Ethics on these and other matters.

In this regard, the aforementioned **Code of Ethics** (which every employee receives upon joining any of the group's companies) establishes 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 detected incident. Emphasis is also placed upon the relationship with our business partners, suppliers and customers, trying to involve them in our good practices and establishing a clear policy against accepting or offering them gifts or items that could be considered a bribe, and against using such gifts or items as a means to gain the acceptance of a supplier, close a business deal or obtain any other type of undue advantage.

In addition, there are specific **internal policies** that impact and further develop the ideas contained in the Code of Ethics and, in the UK, online training programmes have even been implemented for those employees who, by virtue of their position, are particularly exposed to these types of actions.

## CRIMINAL COMPLIANCE

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

The group has made progress and significant steps have been taken in its evolution towards the current **compliance** system, which includes, among others, the existence of a protocol for managing the channel for complaints and internal investigations in order to detect the commission of crimes committed by employees, managers and/or collaborators and, where appropriate, to be aware of and sanction any violations that may occur, so that any employee can bring such circumstances to the attention of the Compliance and Business Ethics Committee so that it can take the appropriate action.

# POLICY OUTCOMES

# 8.3

**The outcomes of the group's policies on bribery and corruption have been satisfactory so far, with no reportable incidents detected during 2023.**

# 8.4 RISKS



The range of corruption and bribery risks faced by the group is diverse and includes, among 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.

In any case, given the volume of public sector contracts in which the group's different companies are involved, it is in the area of relations with public administrations where there is a greater risk for the group in terms of exposure to bribery and corruption.

**To mitigate this risk, a hierarchical approval chain or workflow is established for purchases and sales, and no cash payments or purchases are made in this way.**

# 8.5 MEASURES TAKEN TO PREVENT CORRUPTION AND BRIBERY

As indicated in point 8.1, the group has worked on three different levels to prevent corruption and bribery in all its forms:

Implementation of a comprehensive criminal risk prevention or **compliance** programme.

Establishment of a set of guidelines and instructions on these matters in the **Code of Ethics**, developed through specific internal policies and complemented by online training programmes

Appointment of **independent advisors** to mitigate the potential opportunism of other directors or the controlling partners of the group's parent company.





# 8.6 MEASURES TO COMBAT MONEY LAUNDERING

In addition to strict compliance with the anti-money laundering regulations in force in each country in which the group operates, prevention essentially focuses on avoiding cash transactions for both purchases and sales, and on the rigorous supervision of transactions that could give rise to any doubt, always with the assistance of the legal department.

**No cases of money laundering were reported or detected during the 2023 financial year.**

# 8.7 CONTRIBUTIONS TO FOUNDATIONS AND NON-PROFIT ORGANISATIONS

Tradebe works on and promotes various solidarity initiatives:

**WE COLLABORATE WITH THE “WE ARE ONE” SOLIDARITY GALA**

In February 2023, Tradebe collaborated with the Somos Uno (We Are One) solidarity initiative by donating €2,500. This event is organised by the Alex Foundation and Invest for Children to support the inclusion of people with intellectual disabilities..

**CHRISTMAS JUMPER DAY**

In December, a charity breakfast was organised for employees at several of the group’s offices. At the Sant Joan Despí headquarters, €280.45 was raised and donated to the NGO “Save the Children”.

**WE COLLABORATE WITH “A CHRISTMAS TO REMEMBER”**

Members of the Merrillville, East Chicago and Chicago teams volunteered at the “A Christmas to Remember” event at the Dean and Barbra White Community Center, where they helped distribute gifts to children in Northwest Indiana.

# SECTORAL ASSOCIATIONS

The following table lists the different industry associations of which Tradebe is a member and their corresponding fees, paid in 2023:

Association	Amount paid
CHEMICAL INDUSTRIES ASSOCIATION	17.079,05 GBP
ENVIRONMENTAL SERVICES ASSOCIATION	15.000,00 GBP
ASOCIACIÓN NACIONAL DE AGENTES DE MARPOL (ANAM)	11.536,32 EUR
PACTO MUNDIAL DE LAS NACIONES UNIDAS	7.000,00 EUR
ASOCIACIÓN DE EMPRESAS GESTORAS DE RESIDUOS Y RECURSOS ESPECIALES (ASEGRE)	6.866,80 EUR
ASSOCIACIÓ CATALANA D'INSTAL·LACIONS DE TRACTAMENT DE RESIDUS ESPECIALS (ACITRE)	6.000,00 EUR
ORIGINAL RECYCLING ASSOCIATION	4.924.80 GBP
EUROPEAN UNION FOR RESPONSIBLE INCINERATION AND TREATMENT OF SPECIAL WASTES	4.379,00 EUR
ACLIMA, REFERENTE Y AGLUTINANTE DE LA ECOINDUSTRIA Y LOS SERVICIOS Y PRODUCTOS MEDIOAMBIENTALES DE EUSKADI	3946,17 EUR
INTERNATIONAL MARINE CONTRACTORS ASSOCIATION	3.850,00 GBP
KOSHER LONDON BETH DIN (KLBD)	3.606,00 GBP
FEDERACIÓN ESPAÑOLA DE LA RECUPERACIÓN	3.516,09 EUR
EUROSHORE	3.300,00 EUR
FEDERACIÓN EMPRESARIAL CATALANA DEL SECTOR QUÍMICO (FEDEQUIM)	2.816,00 EUR
CLÚSTER DE RESIDUS DE CATALUNYA	2.500,00 EUR
SOLVENTS INDUSTRY ASSOCIATION	2.220,00 GBP
CHARTERED INSTITUTE OF WASTE MANAGEMENT	1.701.60 GBP
GREMI DE RECUPERACIÓ DE CATALUNYA	1.290,00 EUR
COMISIÓN AUTÓNOMA DE SEGURIDAD E HIGIENE EN EL TRABAJO DE INDUSTRIAS QUÍMICAS Y AFINES (COASHIQ)	1.128,00 EUR
PRL INNOVACIÓN	550,00 EUR
WASTE FACILITIES AUDIT ASSOCIATION	300,00 GBP



SOCIETY

# 9.1 MANAGEMENT APPROACH

**Tradebe is strongly committed to sustainable development and takes into account its own social issues as well as those of its customers and suppliers.** These principles are considered to be of fundamental compliance and have therefore been included as a material aspect of this Sustainability Report.

# 9.2 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.**

On the other hand, energy audits are carried out every four years at Tradebe's facilities in Spain (following RD56/2016 on energy audits), which detail actions to improve the facilities' energy consumption and efficiency.





Below are two specific examples of Tradebe's commitment to sustainable development:

**ECOVADIS GOLD MEDALS**



As part of its commitment to sustainable development, Tradebe undergoes assessment, obtaining good results. For example, the EcoVadis gold medals awarded to Tradebe Port de Barcelona (Environmental Services) and Tradebe Gualba (Life Sciences – Purification) in 2023. These medals are in addition to the one won by Tecnoambiente in 2022.

EcoVadis is the platform responsible for certifying the level of sustainability and best practices of companies in different sectors. This medal recognises good practices in the areas of environment, labour practices and human rights, ethics and sustainable procurement.

**TRADEBE MAKES ITS DEBUT IN ELECTRIC MOBILITY**



In 2023, the first electric vehicle was added to the Tradebe Healthcare fleet, which will be used to collect, process and dispose of medical waste from London's ambulance stations. This van, which will reduce CO2 emissions, is a step forward in Tradebe's commitment to its sustainability goals.

Similarly, a first step into electric mobility was taken in the United States with the addition of an electric van to serve customers in the US Research Triangle Park area in Durham, NC.



# 9.3

## SUBCONTRACTING AND SUPPLIERS

**Purchases related to production are made in accordance with legal requirements and industry best practice, including respect for human rights, gender equality and the environment, in line with industry regulations.**

Our relationship with our suppliers is based on the principles of loyalty, transparency and mutual collaboration. In this regard, Tradebe strives to ensure that its 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 favouring of one supplier over another in order to gain an undue advantage. All decisions must be technically and economically justified, prohibiting favouritism of any kind. With this in mind, as stated in the Code of Ethics, quality, price, ethics, integrity, compliance and experience are the only selection criteria applicable to these relationships. As part of the Integrated Management System and ISO certifications, Tradebe has established supplier selection and evaluation procedures that are regularly audited.

Environmental issues are also part of the criteria applied in the organisation's purchasing. For example, in Spain, Environmental Services carries out the following actions to this end:

At the end of 2023, the sustainable procurement policy was adopted, according to which, from 2024 onwards, procedures will be in place to evaluate suppliers on the basis of their sustainability performance.

In addition, a CO<sub>2</sub> emission limit has been set for company cars, which prohibits the purchase or rental of vehicles that emit more than 160 grams of CO<sub>2</sub>.

In electricity tenders, only suppliers who can guarantee that the energy purchased comes from renewable sources, including certificates of origin, are invited to tender.

# 9.4

## CUSTOMERS

Tradebe's business revolves around protecting the health and safety of its customers and, in particular for the Health & Nutrition business, the end consumer.

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

At Tradebe, we are committed to respecting free competition and anti-trust regulations, avoiding any practice that limits or restricts them, as well as 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 or false information to be given to our customers.

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

## CONSUMER HEALTH AND SAFETY MEASURES

The Health & Nutrition line of business is the one that has the closest relationship with the end consumer, particularly through its sports nutrition products division. Aware of the importance of providing maximum guarantees to the end customer, it has two laboratories (one physio-chemical and one microbiological) that carry out all the necessary analyses on raw materials and finished end products to ensure maximum quality and safety.

Both physio-chemical and microbiological analyses and controls are carried out on each batch of products manufactured, throughout the entire manufacturing process: from the analysis of the raw materials to when the final product is ready for distribution and consumption.

In addition, during 2023, the Health & Nutrition factory in Argenton (Spain) worked to obtain FSSC certification on food safety and quality, which was achieved on 15 January 2024.

## COMMUNICATION SYSTEMS

Tradebe has an Ethics Channel that enables the reporting of non-compliance or other irregularities, both to Tradebe members and to third parties. The communication channel and the Ethics Channel Use Policy are available on the company's website<sup>23</sup>.

<sup>23</sup> The volume of sales to end consumers in Health & Nutrition is less than 1% and is therefore not considered material for the purposes of reporting on complaints received and their resolution. This indicator will be included in the areas for improvement to be implemented in the 2024 reporting.

# IMPACT OF THE ACTIVITY ON LOCAL POPULATIONS AND TERRITORY

**Tradebe's activity**, through the direct and indirect employment of people, the services provided and received, **promotes the local economy of the territories in which we develop our activity.**

We are committed to promoting local training projects, collaborating with academic training programmes

Below is an example of Tradebe's collaboration with local entities.

for students and encouraging dialogue with local communities, acting with the utmost respect for the environment and those around us.

We have the utmost respect for the community of people who live in the areas where we operate, and we ensure that we maintain the highest level of commitment to the environment wherever we operate.

## PARTICIPATION IN THE ULTRA CLEAN MARATHON



**In March 2023, Tradebe entered two teams in the Ultra Clean Marathon**, a sporting and environmental challenge that consists of running while collecting litter in green spaces (plogging). All proceeds from the event were donated to nature conservation and environmental projects. In total, 636kg of waste was collected by the 27 teams that took part.

The two Tradebe teams collected a total of 24kg of waste.

## SUSTAINABLE INITIATIVES ON WORLD ENVIRONMENT DAY



**Teams from different countries supported actions and projects to raise environmental awareness.**

In Barcelona, for example, Tradebe joined more than 15 companies in removing waste from the waters of Barceloneta beach, contributing to the preservation and conservation of the coastline.



And Tradebe Fawley's team built two 'insect hotels', a small initiative that is part of a wider project to protect, restore and promote biodiversity by providing important nectar sources for pollinating insects, attracting wildlife and helping wildflowers to take root.



**TRADEBE YOUTH SUMMIT**

In July, the Tradebe team in the United States organised the first Tradebe Youth Summit in Merrillville and East Chicago. Seven students from the community spent a week at the company, sharing their time with the various Tradebe teams. They were able to familiarise themselves with various areas of our organisation both on site and in the offices with members of the Management, Environmental Health and Safety, Sales, Finance, Human Resources, Laboratory, Maintenance and Transportation, and Operations departments.

The members of each department gave a brief presentation about their personal and professional history, their work and their roles in the company. After explaining why they had decided to link their professional career to Tradebe, they encouraged the students to participate in a simple activity related to their department.

This event is a great opportunity for these young people to learn about the environmental industry and the professional and personal development opportunities it offers.



# 9.6 TAX INFORMATION

**Tradebe maintains its commitment to economic, social and industrial development by strictly complying with the tax legislation in force in each territory in which it operates. Taxes generated by its operations are declared and paid to the relevant authorities.**

The group does not operate in territories declared as tax havens. If there were any commercial transactions 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 based on the tax legislation in force in each territory. Any doubt in this regard, or any transaction that could have a significant tax impact, should first be discussed with reputable independent tax advisors.

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

2023							
	Spain	United States	United Kingdom	Italy	Germany	Consolidation adjustments	Total
<b>Profit from continuing operations</b>	18.537	-525	-608	1.146	-381	-8.151	<b>10.018</b>
<b>Operating subsidies included in profit or loss</b>	747	-	-	-	-	-	<b>747</b>
<b>Allocation of fixed asset subsidies</b>	89	-	-	-	-	-	<b>89</b>

2022							
	Spain	United States	United Kingdom	Italy	Germany	Consolidation adjustments	Total
<b>Profit from continuing operations</b>	20.402	-2.911	20.498	-312	2.542	-11.273	<b>28.946</b>
<b>Operating subsidies included in profit or loss</b>	184	-	-	-	8	-	<b>192</b>
<b>Allocation of fixed asset subsidies</b>	47	-	-	-	-	-	<b>47</b>

In 2023, the group paid a total of €6.613 million (€6 million in 2022) in corporate income tax<sup>24</sup>.

<sup>24</sup> Includes the settlement for the 2022 financial year and payments on account for the 2023 financial year.

# **ANNEX I**

# 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) (hereinafter, "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. (hereinafter, "EQ")
- Ecológica Ibérica y Mediterránea, S.A. (hereinafter, "Ecoimsa")
- Ecoproges, S.L.
- Edafo Gm, S.A.
- Ebedart Fragrances, S.L.U. (formerly Orbe Fragrances, S.L.U.)
- Enviland Medio Ambiente, S.L.U.
- Fragnor, S.L.
- Tradebe Private Foundation
- Management of Marpol Galicia, S.L.
- Ignea Medioambiente, S.L.
- Ingeniería y Tratamientos de Valorización, S.L.U.
- Limpiezas del Nervión, S.A.U.
- Limpiezas Marítimas y Portuarias, S.L.U.
- Lunagua, S.L.U.
- Marpolgal IEA
- Mediaciones Comerciales Ambientales, S.L.
- Multidiet, S.A.U.
- Nutrisport, S.A.U.
- Persan Farma, S.L.U. (formerly Lima Farma, S.L.U.)
- Prointraval, S.L.
- Radesant 17 Business, S.L.
- Sanemar, S.L.U.
- Servicios de Intermediación Medioambiental, S.L.U. (formerly known as Magma Tratamientos, S.L.U.)
- Tecnoambiente, S.L.U.
- Tradebe, S.A.U.
- Tradebe Chemicals Management, S.L.U.
- 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 (dormant)
- Polkacrest Northwest Limited (dormant)
- 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 Limited
- Tradebe Healthcare (Holdings) Limited
- Tradebe Healthcare National Limited
- Tradebe Healthcare South West Limited
- Tradebe Heysham 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,
- Big Blue Tennessee, LLC
- International Hydrocarbon Services, LLC
- Marport, 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
- 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 Port Allen, 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
- Worldwide 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. and Tecnoambiente, S.L.U. Ute (Ute Acosta - Tecno)
- 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. - Geofísica Mar y Tierra, S.A. (UTE Geomytsa Masnou)
- Tecnoambiente, S.L.U. - Geofísica Mar y Tierra, S.A. (UTE Geomytsa Sant Pol de Mar)
- 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 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)
- Ute - Ecotri

# **ANNEX II**

# ANNEX II

## TABLE OF CONTENTS OF THE LAW

Information requested by Law 11/2018	Materiality	Paragraph of the report where a response is given	Reporting criteria <sup>24</sup>	Remarks / reason for omission
<b>GENERAL INFORMATION</b>				
Description of the business model, including its business environment, organisation and structure	Material	2.1 Organisational profile	GRI 2-6 (a), (b) i	Not applicable
Markets in which it operates	Material	2.1 Organisational profile 2.2 Business environment	GRI 2-1 GRI 2-6 b) i	Not applicable
Organisational objectives and strategies	Material	3. Objectives, risks and mitigating factors (introduction)	GRI 2-6	Not applicable
Main factors and trends that may affect its future development	Material	3.1 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	Not applicable
<b>ENVIRONMENT</b>				
<b>Environmental Management</b>				
Management approach: Policies and risks	Material	4.1 Management approach 4.2 Group policies relating to 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	RI 3-3	Not applicable

<sup>25</sup> GRI stands for Global Reporting Initiative. All of them in the latest available version.



Information requested by Law 11/2018	Materiality	Paragraph of the report where a response is given	Reporting criteria <sup>24</sup>	Remarks / reason for omission
<b>Pollution</b>				
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 GRI 305-7 a)	Not applicable
<b>Circular economy and waste prevention</b>				
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) GRI 306-3 GRI 306-04 a) e) GRI 306-05 a) e)	Not applicable
Actions to combat food waste	Non-material	Not applicable	Not applicable	Not applicable
<b>Sustainable use of resources</b>				
Water consumption and water supply according to local constraints	Material	4.8. Sustainable use of resources	GRI 303-04 e) GRI 303-05 a)	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	Not applicable
Direct and indirect energy consumption	Material	4.8. Sustainable use of resources	GRI 302-01 a) b) c) d) e)	Not applicable
Measures taken to improve energy efficiency	Material	4.9. Climate change and management of other emissions	GRI 3-3	Not applicable
Use of renewable energies	Material	4.8. Sustainable use of resources	GRI 302-01 b)	Not applicable
<b>Climate change</b>				
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 305-02 a)	Not applicable
Measures adopted to adapt to the consequences of climate change	Material	4.9 Climate change and management of other emissions 4.10 Effects of climate change	GRI 3-3	Not applicable
Voluntary medium- and long-term reduction targets set to reduce greenhouse gas emissions and the means implemented to this end	Material	4.9. Climate change and management of other emissions	GRI 305-05 a)	Not applicable

Information requested by Law 11/2018	Materiality	Paragraph of the report where a response is given	Reporting criteria <sup>24</sup>	Remarks / reason for omission
<b>Biodiversity</b>				
Biodiversity protection: measures taken to preserve or restore biodiversity.	Material	4.11. Biodiversity protection	GRI 3-3	Not applicable
Biodiversity protection: impacts caused by activities or operations in protected areas	Non-material	Not applicable	Not applicable	Not applicable
<b>SOCIAL AND STAFF ISSUES</b>				
<b>Employment</b>				
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	5.3. Work organisation	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 occupational classification	Material	5.3. Work organisation	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 redundancies by gender, age and occupational classification	Material	5.3. Work organisation	GRI 3-3	Not applicable
Average earnings and their evolution broken down by gender, age and occupational classification or equal value.	Material	5.10. Pay gap	GRI 405-02 a)	Not applicable
Wage gap, the remuneration for equal or average jobs in society	Material	5.10. Pay gap	GRI 405-02 a)	Not applicable
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	5.10. Pay gap	GRI 405-02 a)	Not applicable
Implementation of work disengagement policies	Material	5.3. Work organisation	GRI 3-3	Not applicable
Employees with disabilities	Material	5.7. Universal accessibility for people with disabilities	GRI 405-01 b) iii	Not applicable

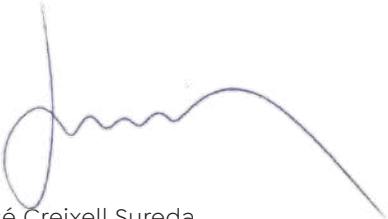
Information requested by Law 11/2018	Materiality	Paragraph of the report where a response is given	Reporting criteria <sup>24</sup>	Remarks / reason for omission
<b>Work organisation</b>				
Organisation of working time	Material	5.3. Work organisation	GRI 3-3	Not applicable
Number of hours of absence	Material	5.3. Work organisation	GRI 403-09 a)	Not applicable
Measures aimed at facilitating the enjoyment of work-life balance and encouraging the co-responsibility of 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
<b>Health and safety</b>				
Health and safety conditions at work	Material	5.4. Health and safety	GRI 3-3	Not applicable
Accidents at work, in particular their frequency and severity, as well as occupational diseases; disaggregated by gender.	Material	5.4. Health and safety	GRI 403-09 a) e) GRI 403-10 a) i	Not applicable
<b>Social relations</b>				
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 agreements, particularly in the field of occupational health and safety at work	Material	5.5. Social relations	GRI 3-3	Not applicable
<b>Training</b>				
The policies implemented in the field of training	Material	5.6. Training	GRI 3-3	Not applicable
The total number of hours of training by professional categories	Material	5.6. Training	GRI 404-01	Not applicable
<b>Universal accessibility</b>				
Universal accessibility for people with disabilities	Material	5.7. Universal accessibility for people with disabilities	GRI 3-3 GRI 405-01 b) iii	Not applicable

Information requested by Law 11/2018	Materiality	Paragraph of the report where a response is given	Reporting criteria <sup>24</sup>	Remarks / reason for omission
<b>Equality</b>				
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 women 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
The policy against all forms of discrimination and, where appropriate, diversity management	Material	5.8. Equality	GRI 3-3	Not applicable
<b>HUMAN RIGHTS</b>				
Management approach: Policies and risks	Material	7.1. Management approach	GRI 3-3 GRI 2-23 a)	Not applicable
Implementation of human rights due diligence procedures; prevention of risks of human rights abuses and, where appropriate, measures to mitigate, manage and remedy possible abuses committed	Material	7.2. Implementation of human rights due diligence procedures	GRI 3-3 GRI 2-26 a) ii	Not applicable
Complaints of human rights abuses	Material	7.2. Implementation of human rights due diligence procedures	GRI 3-3 GRI 406-01 a)	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	7.1. Management approach	GRI 3-3	Not applicable
<b>CORRUPTION AND BRIBERY</b>				
Management approach: policies and risks	Material	8.1. Management approach 8.2. Group policies on anti-corruption and bribery	GRI 3-3 GRI 2-23 a)	Not applicable
Measures taken to prevent corruption and bribery	Material	8.5. Measures taken to prevent corruption and bribery 8.3. Policy outcomes 8.4. Risks	GRI 3-3 GRI 205-03 a) GRI 2-26 a) ii	Not applicable
Measures to combat money laundering	Material	8.6. Measures to combat money laundering	GRI 3-3	Not applicable
Contributions to foundations and non-profit organisations	Material	8.7. Contributions to foundations and non-profit organisations	GRI 3-3	Not applicable



Information requested by Law 11/2018	Materiality	Paragraph of the report where a response is given	Reporting criteria <sup>24</sup>	Remarks / reason for omission
<b>SOCIETY</b>				
<b>Company commitment to sustainable development</b>				
Management approach: policies and risks	Material	9.1. Management approach	GRI 3-3 GRI 2-23 a)	Not applicable
The impact of the company's activity on employment and local development	Material	9.2. Commitment to sustainable development 9.5. Impact of the activity on local populations and territory	GRI 3-3	Not applicable
The impact of the company's activity on local populations and the territory	Material	9.5 Impact of the activity on local populations and territory	GRI 413-1 iv v vii viii	Not applicable
Relations with local community actors and the modalities of dialogue with them.	Material	9.5 Impact of the activity on local populations and territory	GRI 413-1 iv v vii viii	Not applicable
Partnership or sponsorship actions	Material	8.8. Industry associations	GRI 3-3	Not applicable
<b>Subcontracting and suppliers</b>				
Inclusion of social, gender equality and environmental issues in procurement policy.	Material	9.3. Subcontracting and suppliers	GRI 3-3	Not applicable
Consideration in relations with suppliers and subcontractors of their social and environmental responsibility	Material	9.3. Subcontracting and suppliers	GRI 2-6	Not applicable
Monitoring and audit systems and audit results	Material	9.3. Subcontracting and suppliers	GRI 2-6	Not applicable
<b>Consumers</b>				
Consumer health and safety measures	Material	9.4 Customers	GRI 416-1	Not applicable
Complaint systems, complaints received and their resolution	Material	9.4 Customers	GRI 3-3	Not applicable
<b>Tax information</b>				
Country-by-country benefits	Material	9.6. Tax information	GRI 207-4 b) vi	Not applicable
Taxes on profits paid	Material	9.6. Tax information	GRI 207-4 b) ix	Not applicable
Public subsidies received	Material	9.6. Tax information	GRI 201-4 b)	Not applicable

The non-financial information statement of the group in Sant Joan Despí, on 25 March 2024, is hereby declared by:



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)

**2023  
SUSTAINABILITY  
REPORT  
TRADEBE**

**TRADEBE**

