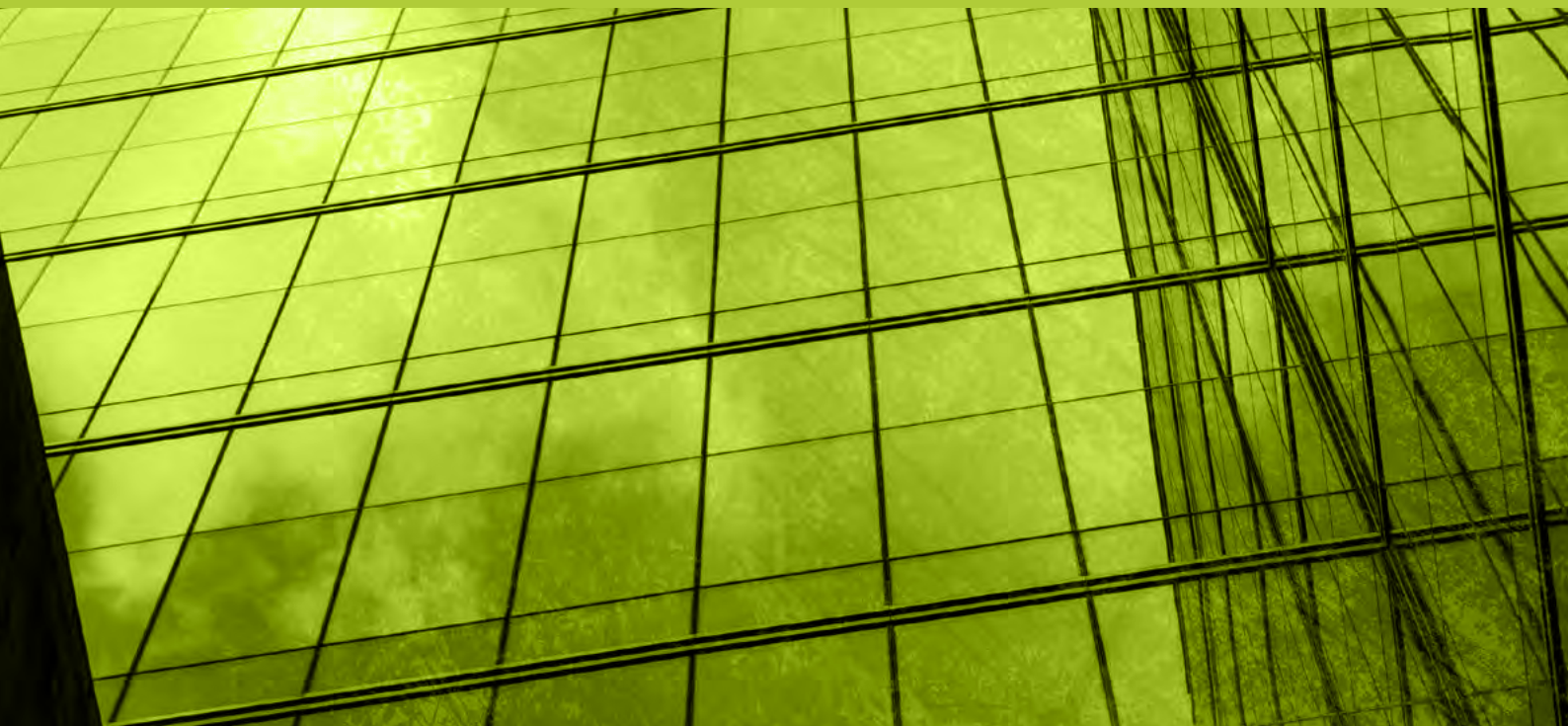




2021

SUSTAINABILITY REPORT





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01

**ABOUT
THIS
REPORT**



1.1.

INTRODUCTION

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

This report, hereinafter referred to as the **2021 Sustainability Report**, corresponds to the period ending 31st December 2021. This report, which has been prepared annually since 2018, includes both individual and consolidated information on all the companies in the Tradebe Group (comprising Grupo Tradebe Medio Ambiente, S.L. and its subsidiaries, as indicated in Appendix I) in all significant aspects as required by Law 11/2018 of 28 December on non-financial information and diversity, and is part of the consolidated annual accounts, being therefore subject to the same approval and publication criteria as the annual accounts.

It has been prepared in accordance with the GRI (*Global Reporting Initiative*) standards, the international reference framework for sustainability reporting. For those indicators



that are not reflected in the aforementioned standard, our own reporting criteria have been followed.

In accordance with the current legal requirements, this 2021 Sustainability Report has been verified by *RSM Spain Auditores, S.L.P.*

Please contact us via the company's website for any queries regarding the report or its contents:

www.tradebe.com

1.2 MATERIALITY AND STAKEHOLDER ANALYSIS

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

Through this analysis, we have identified the most relevant environmental, social and governance aspects (hereinafter ESG²) for the business that generate or may generate a direct or indirect impact on the organisation's ability to create, preserve or add value, both for the company itself and for its stakeholders. The results of the analysis have provided key information to improve future ESG management, identify areas with greater risk exposure and ensure proper alignment with the concerns of our stakeholders and society in general.

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



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

² ESG stands for Environmental, Social and Governance.

The analysis aims to:

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



Tradebe's materiality analysis has been structured in three phases:

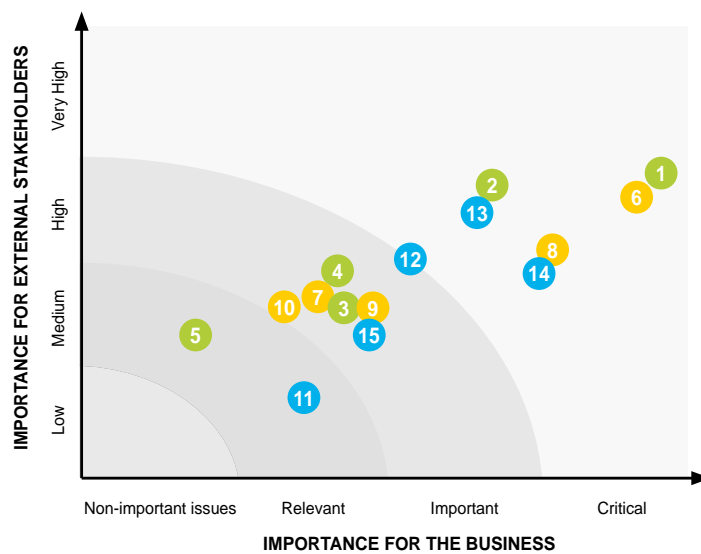
1 Starting point and benchmarking	<ul style="list-style-type: none"> i. Review of past materiality analysis results and comparison with ESG issues studied - Benchmarking ii. Preliminary list of ESG factors to be incorporated in the materiality analysis based on Tradebe's business model. iii. Definition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




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

Results

The 2021 analysis prioritises the ESG issues that were identified according to the relevance and impact given to them by the internal and external stakeholders. This has resulted in 15 top material issues being prioritised. Each grey band represents the importance of the factors within it, making it easier to identify their importance visually.

2021 materiality matrix:



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

Tradebe's 2021 materiality analysis identifies six key sustainability issues:

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

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

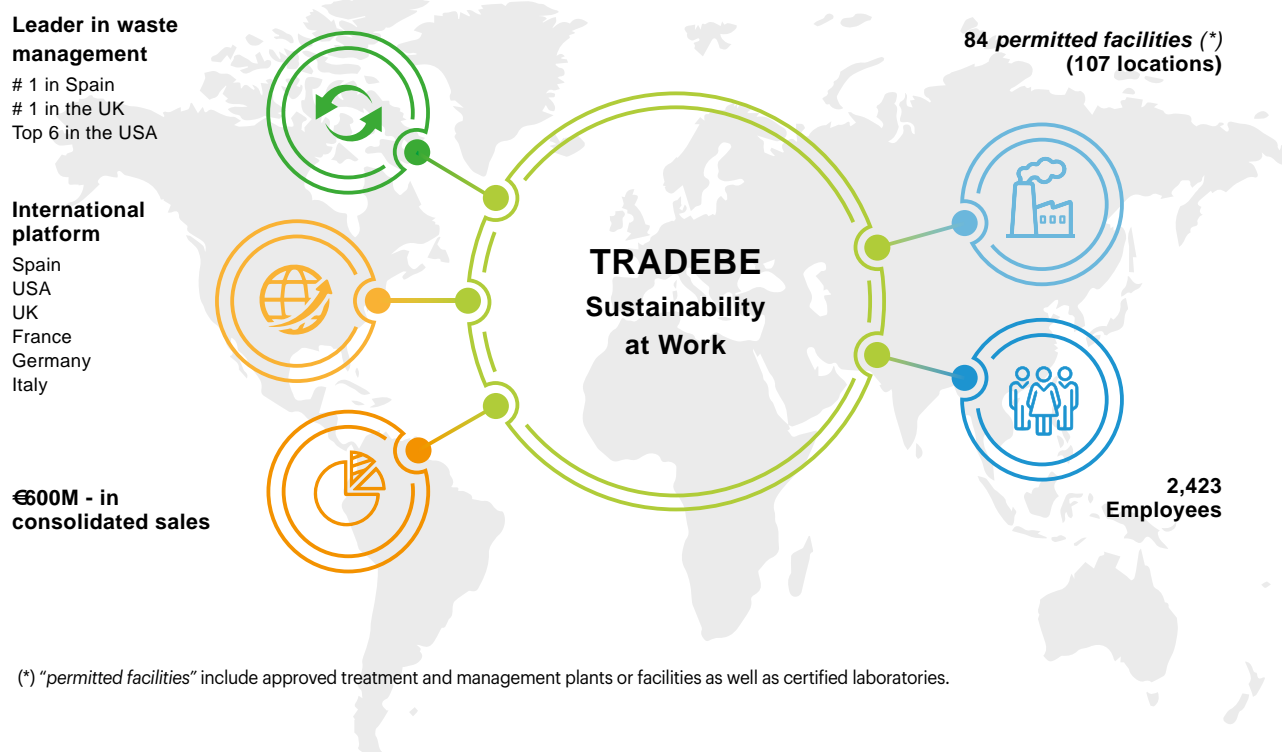
These specific issues have been in focus in recent years to improve our ESG risk profile, but the results of this analysis confirm their relevance. These have been addressed by establishing specific lines of work in the sustainability committee, internal improvement and obtaining international certificates,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

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

A photograph of an offshore oil rig, showing its complex structure of pipes, ladders, and platforms against a clear sky and the ocean. The image is partially covered by a large green rectangle on the left and a large white stylized 'S' shape in the center.

ORGANISATION AND ENVIRONMENT

2.1. ORGANISATIONAL PROFILE



Grupo Tradebe Medio Ambiente, S.L., domiciled at Calle Punta Sollana, 12, Zierbena (Bizcaia), Spain, is the holding company of this group³, hereinafter referred to as Tradebe.

Tradebe is an **internationally diversified operator** that has been offering its services in the waste management sector since 1984. It specialises in the provision of **quality, innovative, and non-discretionary environmental services to industry**, thereby contributing to sustainable development.

The non-discretionary nature of the services provided is due to the fact that Tradebe's activity is closely linked to (a) environmental legislation, standards and regulations, (b) the application and compliance with this legislative, normative and regulatory framework by the industry (industrial waste generators) and (c) the supervision and control by the corresponding environmental authorities and agencies that ensure compliance with said environmental legislation, standards and regulations (enforcement).

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

Tradebe specialises in the provision of environmental services to industry through the **management, mitigation, remediation, collection, treatment, recovery, recycling and/or disposal of industrial waste**, mainly *Industrial Hazardous Waste* and, to a lesser extent, *Industrial Non-Hazardous Waste*. It also in the markets **and sells by-products derived from the recycling of such waste**.

Tradebe was founded in 1984. Its founder, Mr. Josep Creixell, identified the need to offer specialised environmental services to industry, where the complexity of generated waste was increasing, thus anticipating the subsequent and growing environmental awareness by both society and industry.

Since its foundation, Tradebe has combined organic and inorganic growth to adapt and overcome different economic cycles. In terms of its evolution, there are two main periods:

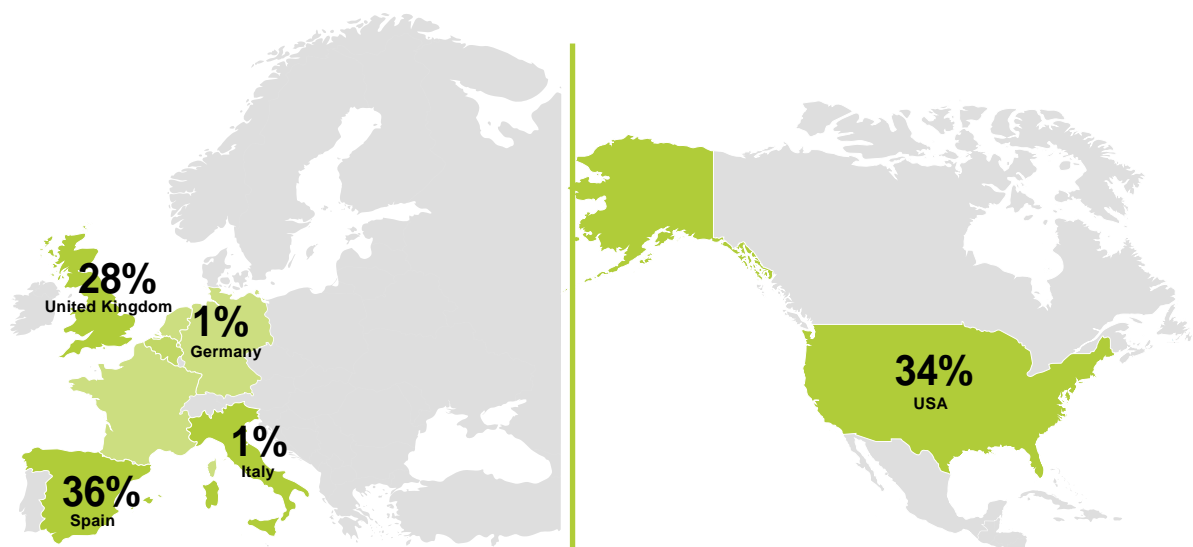
1. Initial period (1984-2005)

Creation and consolidation of Tradebe as Spanish market leader in the provision of environmental services to industry, and the start of an international presence in the United States and the United Kingdom.

2. Internationalisation period (2005-2021)

Consolidation of Tradebe in the United States and the United Kingdom markets and start of activity in Germany and Italy.

A third of Tradebe's sales are generated in Europe, with the rest being split between the United Kingdom and the United States.

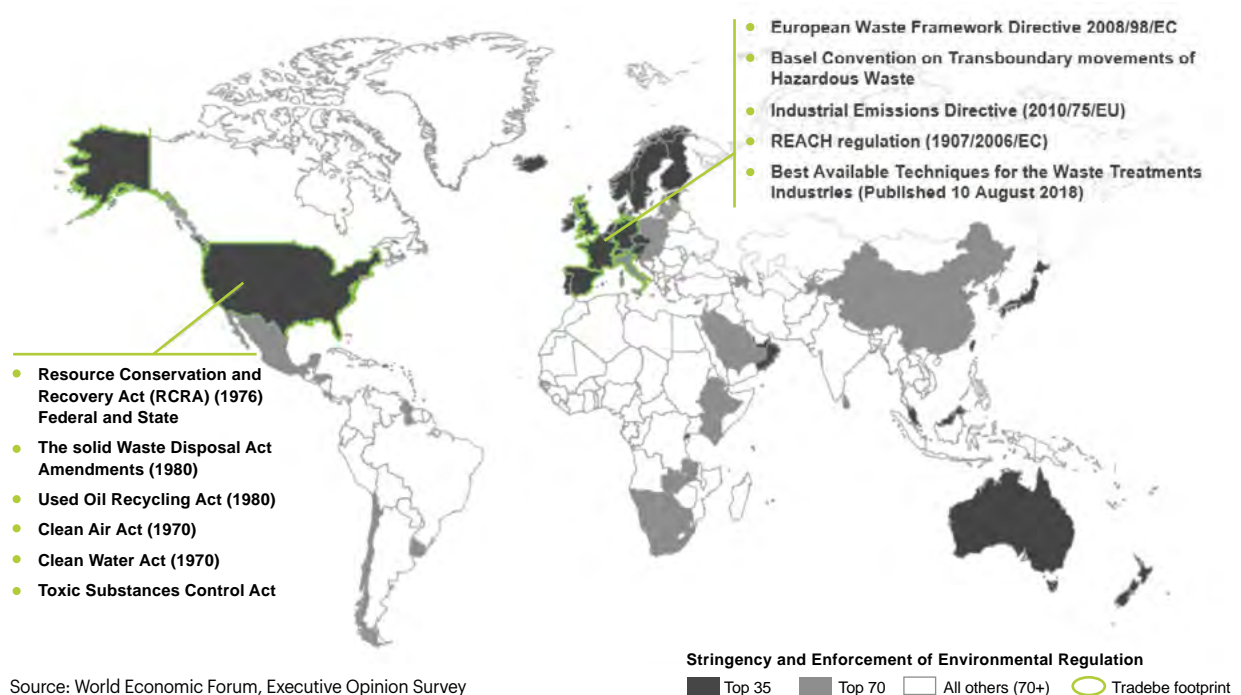


2.2. BUSINESS ENVIRONMENT

SECTOR DIVERSIFICATION

Tradebe provides its services in a diversified way to several industries and sectors (sectoral diversification). The main industrial sectors it provides services to include: *Materials and Chemicals* (pharmaceutical, chemical, petrochemical industries...), *Energy* (Oil and Gas industries, terminals, pipelines...), *Industrial* (metallurgy, mining industries), *Utilities* (electrical industry), *Automotive*, *Healthcare and Government* (Healthcare system, Defence etc.).

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



DIVERSIFICATION OF ACTIVITY

Tradebe's activity is aligned with the concepts of:

- **Circular Economy**

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

The concept of Circular Economy, which is diametrically opposed to the concept of Linear Economy/Productive Model (extract, manufacture, consume and throw away), is a productive model that promotes the minimum use of materials and energy, and the maximum use of recycling and reuse.

- **Waste Hierarchy**

The regulatory framework for the waste management sector aims to protect the environment and human health.

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

Tradebe provides services through its three main business lines: **Recycling and Energy Recovery, Technical Services, and Field Services.**



• RECYCLING AND ENERGY RECOVERY

Recycling and energy recovery services represent 38% of Tradebe's revenue in 2021 (35% in 2020).

Recycling

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

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

a) Solvent recycling (Solvents)

Tradebe has a leading position in solvent recycling in Europe and has three distillation plants in the UK, one in Spain, one in Germany (Schwarzheide), and one plant in Italy (Fidenza).

b) Recycling of hydrocarbons (Fuel/Oil)

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

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

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

d) Light Weight Aggregate (LWA) Production

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

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

Energy Recovery

Energy recovery consists of processing, preparing and conditioning the waste to give it a different use such as generate electricity or produce alternative fuels, by taking advantage of the calorific value of the waste (*energy recovery or fuel blending*). The cement industry is the main recipient of Refuse-Derived Fuel (RDF) or Alternative Fuels (AF) due to its interest in reducing its consumption of CO₂ emission allowances.

• **TECHNICAL SERVICES**

Technical services represent approximately 55% of Tradebe's revenue in 2021 (59% in 2020) and are divided into Treatment Services and Disposal Services.

Waste Treatment Services (*Treatment*)

Waste treatment services account for 46% of revenue in 2021 (49% in 2020) and are carried out at transfer stations and treatment plants.

Transfer Stations

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

Treatment Plants

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

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

Waste Disposal Services (Disposal)

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

a) High-temperature thermal treatment

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

b) Controlled deposits

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

• **FIELD SERVICES**

Field Services, which represent 7% of Tradebe's revenue in 2021 (6% in 2020), consist of environmental services provided at the customer's premises (as opposed to *Recycling & Energy Recovery* and *Technical Services* which are mainly provided at Tradebe's *authorised facilities*).

Industrial Services

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

Environmental and Marine Survey Consultancy and Laboratory

Tecnoambiente, S.L.U., based in Spain, is Tradebe's environmental consultancy specialising in the marine environment and both offshore and onshore projects. *Tecnoambiente* has experience in international projects in Europe, Africa, Asia and America for geophysical, hydrographic and baseline surveys for clients in the oil and gas, renewable energy, submarine cables and ports sectors. In addition, it has three in-house laboratories, two of which are accredited.

2.3

ALIGNMENT WITH TAXONOMY

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

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

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

1. To make a significant contribution to at least one of the 6 EU environmental objectives:
 - i. Climate change mitigation (defined activities and criteria).
 - ii. Adaptation to climate change (defined activities and criteria).
 - iii. Sustainable use of hybrid and marine resources⁴.
 - iv. Circular economy⁴.
 - v. Pollution prevention⁴.
 - vi. Ecosystems and biodiversity⁴.
2. To meet the technical selection criteria specific to the activity.
3. Not to cause significant detriment to any of the other environmental objectives.
4. To act in accordance with minimum social guarantees.

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

Article 8 of the regulation (2020/852/EU) states that non-financial companies under the application of the Non-Financial Reporting Directive 2014/95/EU must disclose how and to what extent their activities are associated with sustainable economic activities of the Taxonomy Regulation. The same Article 8 (2) specifies that three indicators must be published; the percentage of Revenue, the percentage of CapEx and the percentage of OpEx associated with sustainable economic activities. From 2022, it is obligatory to publish all 3 indicators with respect to eligible activities, and in 2023 aligned activities will be published.

⁴ Economic activities and the sustainability criteria and safeguards to be met in order to contribute to the climate objectives defined in the Taxonomy Regulation.

As a first step, the Taxonomy Regulation - through the Climate Delegated Act - has defined only those economic activities and the sustainability criteria and safeguards to be fulfilled so as to contribute to the following two environmental objectives:

- i. mitigation and
- ii. adaptation to climate change

It is also important to note that only non-hazardous waste activities have been defined in the current Taxonomy Regulation. It does not include activities linked to hazardous waste, which is Tradebe's main and core activity in terms of revenue, CapEx and OpEx.

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



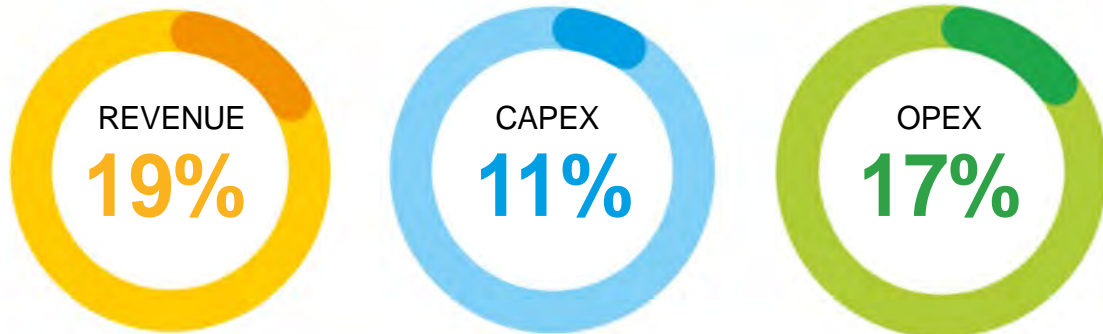
According to the Taxonomy Regulation, Tradebe's eligible activities identified in the 2021 fiscal year as having the potential to make a substantial contribution to climate change mitigation and adaptation are as follows:

Tradebe's business activity	Activity incorporated in the Taxonomy Regulation
Recycling	5.9 Recovery of non-hazardous waste materials
Energy recovery	5.10 Landfill gas capture and utilisation
Waste treatment services	5.5 Collection and transport of non-hazardous waste in source segregated fractions 5.3 Construction, extension and operation of wastewater collection and treatment systems 5.8 Composting of bio-waste
Environmental consultancy and marine surveys	6.16 Maritime and inland waterway transport infrastructure 6.16 Infrastructure enabling low-carbon inland waterway transport 8.2 Data-driven solutions to reduce greenhouse gas emissions 9.1 Technical engineering services and other activities related to technical advice on climate change adaptation 9.2/9.1 Near-market research, development and innovation

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

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

- **Revenue:** Out of a total of 591,411 thousand euros of consolidated revenue in 2021, 110,064 thousand euros are considered to come from eligible economic activities based on those outlined in the Climate Delegated Act. This corresponds to **19%** of revenue in 2021.
- **CapEx:** As for CapEx, as defined in the Article 8 Delegated Act, of the 32,219 thousand euros invested in 2021, 3,521 thousand euros are considered to be eligible investments based on the Taxonomy Regulation. This corresponds to **11%** of the 2021 CapEx.
- **OpEx:** As for OpEx, as defined in the Article 8 Delegated Act, of 565,597 thousand euros in 2021, 93,317 thousand euros are considered to be eligible OpEx based on the Taxonomy Regulation. This corresponds to **17%** of the 2021 OpEx.



Despite the current limited scope of the Taxonomy Regulation focusing on only two (2) of the six (6) environmental objectives and not including activities linked to hazardous waste (Tradebe's core business), part of Tradebe's activities, as a company focused on environmental services, already show remarkable levels of eligibility (revenue (19%), CapEx (11%) and OpEx (17%)).

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

2.4

PURPOSE AND VALUES

As stated in the **Sustainability Policy**, at Tradebe we have the drive, capability and commitment to contribute to **sustainable industrial development**. We are firmly committed to minimising the impact of industrial processes to meet the needs of society.

We know that our contribution to industry and society is only possible **because of our employees**. That is 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 are committed to the environment and the communities where we live and work.



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

OUR COMMITMENTS

To carry out our purpose, the current sustainability policy, among others, sets out our commitments in Environmental, Social and Good Governance matters.

- *In Environmental Matters*

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

We are also committed to fighting climate change by reducing the carbon footprint of our work centres, through the decarbonisation of the energy consumed, energy efficiency studies and the necessary technological changes in order to guarantee the protection of the environment and biodiversity.

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



- ***In Social Matters***

The health and safety of our employees, the development of their talent and their growth are part of Tradebe's values. We support the United Nations Universal Declaration of Human Rights and want to build a sustainable future for all in the communities where we operate.

We are committed to continuous training to develop the skills of all employees as well as the continuous improvement of the health and safety of all people in our workplaces, beyond the legal requirements, through the maintenance of ISO 45001 certifications.

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



- ***In Good Governance Matters***

It is essential to ensure the management of financial and non-financial risks. We are committed to the ethical management of growth in economic benefits but which are sustainable for the planet, and respectful and fair with the markets and people. For this purpose, we have a Code of Ethics that is a reference for all employees.



We are committed to complying with current legislation and the responsibilities acquired contractually or voluntarily, through a Compliance model and, in the form of adherence, with the authorities and third parties. The maintenance of ISO 9001 certifications in all our plants ensures not only compliance with the requirements of our customers, but also the continuous improvement of our services, to their benefit.

Cybersecurity is a matter of active concern to ensure responsible use of information by all parties. We have developed internal controls to monitor the above commitments.

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

Our actions are aligned with the 2030 Agenda, and we have a Sustainability Committee to ensure compliance and monitoring. The company is committed to partnership and is present in many associations, through which it firmly promotes the contents of this Sustainability Policy.

Tradebe's values are the basis of its management model and the reference axis for the organisation. The group's lines of action are based on the following values:



2.5 GOVERNANCE

As at 31 December 2021, Tradebe's Board of Directors consisted of 5 members (1 woman and 4 men) aged between 30 and 72. The members of the Board of Directors meet the criteria of good repute, experience and good governance required by the relevant legislations and cover the range of expertise required by the group's activities.



Josep Creixell
Founder Chairman



Jordi Creixell
*Legal Counsel
Secretary*



Maria Creixell



Victor Creixell
*CEO Environmental
Services Division*



Oscar Creixell
*CEO Tradebe
Chemicals Division*

In 2021 the Board of Directors met 4 times to review, be informed and, if necessary, make decisions on key aspects of the group, including group results, strategic planning, budget and compliance with regulatory and contractual compliance obligations.

The members of Tradebe's Management Committee as at 31st December 2021 were:



Victor Creixell
CEO



Jordi Borrell
*Chief Financial
Officer*



Alex Gazulla
*Development &
Expansion Director*



Sandra Erliso
*Global HR &
Comm Officer*



Iñaki Zaldúa
CEO Spain



Jeff Beswick
CEO US



Kristian Dales
CEO UK



3 OBJECTIVES, RISKS AND MITIGATING FACTORS

3.1. INTRODUCTION

Tradebe's main objective revolves around the concept of the 4Rs: **Reduce, Reuse, Recycle, Recover.**

Based on this main idea, the company works continuously on the basis of the *Total Waste Management* concept, providing flexible, innovative and technologically driven solutions.

With this objective in mind, Tradebe's strategy is based on the following pillars:

- i. Cost-effective and selective growth (organic and inorganic) by means of:
 - a. Consolidation in the markets where Tradebe is already positioned (USA, Spain and UK).
 - b. Expansion into new markets (i.e., Continental Europe).
 - c. Exploring market opportunities in the Middle East.
- ii. Development and focus on the activities most aligned with the *Circular Economy* and *Waste Hierarchy*.
- iii. Competitive differentiation and greater customer service through the implementation of digitalisation initiatives and improved efficiency of business processes.
- iv. Ensure high levels of execution, service and results through talent attraction, management and retention initiatives.



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

3.2. COMMITMENT TO THE SUSTAINABLE DEVELOPMENT GOALS

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

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

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



In 2021, actions which contribute to the SDGs include:

SDG 3 – Good Health and Wellbeing

- 20% reduction of noise emitted in the operation of waste handling in containers, waste pumping and dust washer (Tradebe Santander).
- Improved suction and scrubbing of gases in reactors (Tradebe Santander).
- Reduction of noise exposure of lorry drivers in Ortuella and Valles during the lorry cleaning process.

SDG 4 – Quality education

- Chemical training and waste training, knowledge of hazard characteristics and associated handling.
- More than 37,000 hours of employee training in health and safety, languages, professional and social skills, and technical training.

SDG 6 – Clean water and sanitation

- Improvements to plant processes and updating of procedures to reduce water consumption. (Tradebe Valencia).
- Improved distillation efficiency (Tradebe Disolventes Gualba).

SDG 12 – Responsible consumption and production

- Reduction in the purchase of raw materials through the use of ashes that can replace magnesite or sepiolite. (Tradebe Port de Barcelona).
- Reduction of consumption and emissions associated with production processes (Tradebe Valdilecha).
- Increase in the amount of waste from shredding destined for recovery compared to disposal. (Tradebe Amorebieta).

SDGs AWARENESS CAMPAIGN

Tradebe has carried out actions to raise awareness amongst its employees about the importance of achieving the SDGs and makes them aware of the ability of individuals and companies to contribute to sustainability. Some of the actions carried out by Tradebe include:

- Formalisation of the Sustainability Committee to supervise the company's compliance and monitoring in these matters.
- Formalisation of the 2021 Sustainability Policy.
- Communication and training actions for employees in relation to the 2030 Agenda and the SDGs.



3.3.

MAIN RISKS AND MITIGATING FACTORS

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

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

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

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

The main risk factors to which Tradebe is exposed fall into five broad categories: financial, regulatory, cybersecurity, accident and acquisition-related risks.

CATEGORY	INHERENT RISK	RISK MANAGEMENT
Regulatory	<ul style="list-style-type: none"> • Non-compliance with environmental obligations • Non-compliance with environmental legislation • Non-compliance with Occupational Health and Safety legislation • Litigation and claims 	<p>Tradebe's activities are subject to compliance with strong sector-specific and general regulations in the different jurisdictions in which it operates (accounting, 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 for Waste Treatment (Best Available Techniques Reference Document for Waste Treatment, 2018), the European Union Climate Action and Green Pact (COM/2019/640 final) and the European Commission's Action Plan for the Circular Economy of 11th March 2020.</p> <p>The multi-jurisdictional regulatory framework to which the group's activities are subject requires efforts to meet all regulatory requirements, since failure to comply with any of the multiple required precepts could result in, among others, the revocation of licences or the imposition of fines or penalties that hinder or, eventually, prevent the development of all or part of Tradebe's activities.</p> <p>The management approach is to consider this risk as an opportunity, promoting a culture or way of thinking based on the ethical commitment to do things well, turning strong regulation into an opportunity for constant improvement and as a symbol of excellence. Increasingly rigorous environmental legislation means focusing even more efforts on achieving more efficient recycling processes, as well as fostering greater awareness with customers and society in general.</p> <p>All Tradebe's businesses operate to a range of best practices and standards, and the integrated management system enables activities to be managed as efficiently as possible while meeting the requirements of a world-class organisation in terms of environmental and safety issues. A team of 64 professionals is responsible for ensuring the correct implementation of the integrated management system and for carrying out the activities that guarantee the prevention of environmental and occupational safety risks.</p>

CATEGORÍA	RIESGO INHERENTE	GESTIÓN DEL RIESGO
Cyber risks	<ul style="list-style-type: none"> • Exposure to cyber-attacks 	<p>Tradebe is exposed to cyber risks and attacks that could have a negative impact on results, reputation and image.</p> <p>In addition to the strategy of digitalisation and improving the efficiency of business processes, the group has a strong position with respect to cyber security, which is one of the priorities of its strategy.</p>
Accident rate	<ul style="list-style-type: none"> • Exposure of individuals to accidents • Exposure of facilities to incidents 	<p>Tradebe's activities and its employees are exposed to accidents and incidents. Along with the corresponding insurance policy (i.e., damages), the group has a technical advisory service specialised in the safety of people and facilities, to support and prevent the risk of accidents. These services include training, preventative inspections, technical advice on health and safety, and technical consultancy services.</p> <p>The management approach is that nothing is worth getting injured over: all accidents and hazardous situations are preventable, and safety must be actively managed.</p> <p>In addition, the group has a team of 64 professionals who are responsible for carrying out activities that ensure the prevention of environmental and occupational safety risks.</p> <p>Care for the health and safety of employees is above and beyond being a priority and has been included as one of the group's values.</p>
Risks associated with COVID-19	<ul style="list-style-type: none"> • Employee exposure 	<p>During the crisis, there was a risk to employee health as a result of coronavirus transmission in the workplace. The Tradebe team has developed risk assessments of its employees, especially for those who carry out frontline activities and are therefore more exposed. Accordingly, control measures have been identified and appropriate protocols and guidelines have been developed. (See list of measures in Note 4.4).</p> <p>In addition, as an essential service provider, Tradebe closely monitored the impact of COVID-19 on the business and supply chain, working hard to minimise the impact of the pandemic on the company. In addition to giving higher priority to protecting the health and wellbeing of its employees, the organisation continued to provide essential services, while also looking after the health of the customers it serves.</p>

04

**ENVIRONMENTAL
ISSUES**



4.1.

MANAGEMENT APPROACH

Environmental issues are a natural and intrinsic part of Tradebe's core business and have therefore been considered as one of the most relevant material issues for the Non-financial Information Statement.

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

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

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

Aware of the importance of the health and safety of all employees, the protection of the environment and customer satisfaction, Tradebe has an **INTEGRATED QUALITY, SAFETY AND ENVIRONMENT POLICY**, according to which it is committed to integrating its management system and focusing its policy on the following basic principles:

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

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

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

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

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

vi. Prepare, verify and review self-protection plans and emergency measures, as well as improving, systematising emergency planning and managing action in crisis situations.

vii. Cooperate with the administration, competent public bodies and other business associations in the search for solutions to the environmental issues facing society.

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

ix. Minimise the impact on the environment and the health and safety of workers and stakeholders and manage change effectively.

x. Promote the development of the talent of all employees through information, training and awareness-raising to achieve the established objectives of continuous improvement.

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

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

A team of 64 professionals, a third of whom are based in the United Kingdom, the United States and Spain, is responsible for ensuring the correct application of the integrated management system and for carrying

4.2. GROUP POLICIES ON ENVIRONMENTAL ISSUES

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

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

In summary, the integrated management system considers all the factors associated with the group's activity, based on its knowledge of

the activity, as well as any other available information (interviews with operations, checklists, studies, etc.).

Tradebe's operations are designed to minimise potential human and/or environmental exposure to hazardous waste. The methodology used for risk assessment is based on the identification of actions and working conditions that involve a potential risk. Consequently, and following an appropriate assessment, the necessary preventative measures are implemented to eliminate/mitigate and control such risks.



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

1 Environmental risk management

2 The promotion of the circular economy and waste management efficiency

3 Regulatory compliance and responsible practices

These risks are managed and minimised through:

- Implementation and maintenance of adequate plant **safety systems**
- Carrying out **regular inspections** of plants on the basis of specific programmes
- Spill **prevention** and containment procedures
- Preventative **procedures**, for example, accidental ignition and/or reaction between incompatible materials or wastes

ISO certifications, integrated environmental authorisations and **Resource Conservation and Recovery Act (RCRA)** permits⁵ provide the framework for the Group's health, safety and environmental policies. These policies set out both the frequency and the scope of inspections and represent the fundamental basis for preventing the aforementioned environmental risks.



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

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

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

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

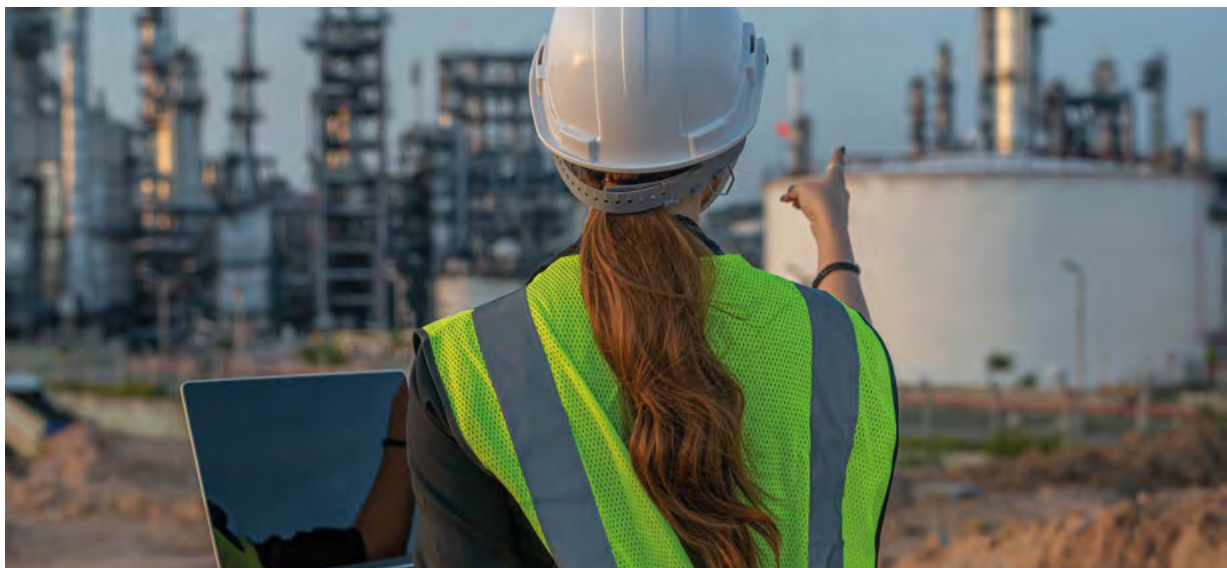
 <p>Regular safety inspections</p>	<p>Drum and container storage areas are regularly inspected for structural integrity and proper sealing. In addition, processing, storage, laboratory and office areas are equipped with easily accessible fire extinguishers, first aid kits, eyewash stations and emergency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

4.3. POLICY OUTCOMES

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

For example, the following improvements have been made:

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



4.4.

IMPACT OF THE GROUP'S ACTIVITY ON THE ENVIRONMENT

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

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

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

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

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

Due to the high levels of regulation, the emission limits set by the regulator, for which Tradebe's business achieves very good levels of compliance, and the group's firm commitment to ethical

compliance, it can be said that the group's activity does not pose a threat to health and the environment.

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

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

4.5. PRECAUTIONARY PRINCIPLE

The precautionary principle is a concept that supports the adoption of protective measures when there is a substantiated suspicion that certain products or technologies pose a serious risk to public health or the environment, despite lacking definitive scientific proof.

This principle is fully integrated into the operational control processes and is reviewed via numerous policies and programmes implemented at Tradebe. This is also a mandatory requirement for the group's activities in Europe, as the European Union applies it in its legislation both when regulating the Environment and when regulating Occupational Risks.

4.6. PROVISIONS AND GUARANTEES

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

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

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

As specified in Note 1.1 of the consolidated annual report of Tradebe Medio Ambiente Group, the group has provisions for asset decommissioning and environmental provisions amounting to 42.7 million euros (41.8 million euros in 2020).

4.7. CIRCULAR ECONOMY AND WASTE MANAGEMENT

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



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

CIRCULAR ECONOMY IN MARITIME TRANSPORT

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

The results obtained have shown that the circular process is possible, converting the waste into a high-quality product, with a performance comparable to that of virgin fuel and at the same time complying with the parameters required by the International Maritime Organisation 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 CO₂ emissions in terms of exploitation of traditional fossil fuels.

NEW CONCESSION AT THE PORT OF BARCELONA

At the end of 2020, following the end of Tradebe's concession period in the **Port of Barcelona**, the Barcelona Port Authority granted the group company *Ecológica Ibérica y Mediterránea* a new 23-year concession for a surface area of 24,204 m². This concession is linked to an investment commitment for the construction and operation of a new plant dedicated to the treatment of industrial and maritime waste (mainly from ships) in the Port of Barcelona and allows for the continuity of the activity in more modern facilities.

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

In line with these objectives, in 2019, Tradebe Port de Barcelona received the ISCC Plus Certificate (International Sustainability and Carbon Certification plus) for Tradebe Green Fuel (TGF), fuel obtained from ship fuel waste (MARPOL, Annex I, type C), becoming the first company in the sector to receive it.

Since obtaining the ISCC Plus certification, all our products originating from this type of waste are shipped under a Sustainability Declaration. And while certification cannot be the sole driver of the necessary transition to an environmentally, socially and economically sustainable future, it is an essential element in

ensuring transparency throughout global supply chains and ensuring our commitment to the environment and sustainable production.

THE CONTRIBUTION OF TRADEBE CHEMICALS TO REDUCING ITS CARBON FOOTPRINT

The solvent recycling business incorporates, as an integral part of its services, the calculation of carbon footprint savings for its customers. These savings are generated for every tonne of recycled chemical used instead of virgin chemical.

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

The project involved establishing a closed recovery loop for a given waste stream, establishing a full life cycle carbon footprint of the process, implementing improvement initiatives to minimise its carbon footprint and finally providing the client with auditable carbon savings results for every tonne of recycled chemical used instead of virgin chemical.

ADHERENCE TO INITIATIVES IN FAVOUR OF THE CIRCULAR ECONOMY

Tradebe has joined:

- The Pact for a Circular Economy, promoted by the Spanish Association of Special Waste Managers (ASEGRE).
- The European Fluorocarbons Technical Committee "Say no to illegal HFCs" Campaign
- Agreement for Climate Action, signed with the *Generalitat of Catalonia*

FOOD WASTE

Food waste, as established in Law 11/2018 on non-financial information and diversity, is considered minimal or non-existent in Tradebe's business and is only concerned with the consumption of food by employees.

4.8.

SUSTAINABLE USE OF RESOURCES

WATER CONSUMPTION

Each centre controls the consumption of natural and artificial resources for their correct management and reporting to the relevant authorities. On many occasions, as explained in the previous point, waste delivered by customers is used as a supply of water, raw materials or additives in the group's treatment processes, thus avoiding the use of original raw materials.

In many cases, water consumption comes from wastewater treatment plants. This water is filtered, treated and discharged into the appropriate environmental channels so that it can be re-circulated for use in treatment, thus minimising the use of clean water. Wherever possible, technological innovations are introduced to reduce water consumption.

Water use and discharge by source and destination is shown below⁶:

WATER USE BASED ON SOURCE (Mgl)	2021	2021 (%)
Surface water	14	2%
Groundwater	59	8%
Third-party water	625	89%
TOTAL	699	100%

WATER DISCHARGE BY DESTINATION (Mgl)	2021	2021 (%)
Surface water	408	17%
Groundwater	156	7%
Third-party water	1,803	76%
TOTAL	2,368	100%

⁶ During the 2021 financial year, Tradebe implemented improvements in the environmental indicator reporting system, as part of the maturity process for this type of information. The criteria, calculations and sources of information used have been reviewed to improve the consistency of the data, improve alignment with GRI standards and provide useful information to the user of the report. In cases where this review has resulted in the impossibility of comparing 2021 data with 2020 data, only the 2021 data is reported.

ENERGY CONSUMPTION

The consumption of fuels from renewable and non-renewable sources in 2021 and 2020 are as follows:

ENERGY CONSUMPTION (MWh)	2021	2021 (%)	2020	2020 (%)
NON-RENEWABLE SOURCES	303,415	91%	286,983	91%
Natural Gas	101,555	30%	89,353	28%
Diesel	100,942	30%	88,597	28%
Recycled fuel	83,264	25%	89,714	29%
Other	17,654	5%	19,319	6%
RENEWABLE SOURCES	30,141	9%	27,391	9%
Biogas	30,141	9%	27,391 ⁷	9%
TOTAL FUEL CONSUMPTION	333,556	100%	314,374	100%

Tradebe is the concession holder for two energy recovery contracts in the controlled organic matter deposits located in Montalbán de Córdoba and Valsequillo. The consumed biogas comes from these sites.

This biogas is generated by the accumulation of organic matter in an anaerobic environment and the methane it contains is used as fuel to obtain electricity through combustion engines. This electricity is certified as renewable energy and generates guarantees at source issued by the CNMC that are transferred to the plants that end up consuming it.

Approximately 50% of the electricity generated from biogas is sold to Tradebe's plants in Spain, and the other 50% is sold to the regulated market (OMIE).

Electricity consumption in Tradebe per country is:

ELECTRICITY CONSUMPTION BY COUNTRY (MWh)	2021	2021 (%)	2020	2020 (%)
Spain	20,669	29%	35,978	45%
United States	26,965	38%	26,080	32%
United Kingdom	24,030	34%	18,581	23%
TOTAL	71,664	100%	80,638	100%
ELECTRICITY SOLD	30,141		27,333	
NET ELECTRICITY CONSUMPTION	41,523		53,305	

⁷ Figure recalculated in 2021 (see footnote 5).

Another factor contributing to the reduction in net energy consumption is the sale of *Secondary Liquid Fuel (SLF)*, which is an alternative fuel produced at the Heysham plant in the UK. This fuel is produced from a blend of recycled solvents and is sold as “*cemfuel*” for use in cement kilns. In 2021, the equivalent of 94,666 MWh of energy was sold.

WASTE MANAGEMENT

In 2021, Tradebe's plants received 2.1 million tonnes of waste (1.7 million tonnes in 2020), an increase of 21% on the previous year:

INPUT OF WASTE BY TYPE (tonnes)

	2021	2021 (%)	2020	2020 (%)	Change
Hazardous	924,119	44%	754,773	44%	22%
Non-hazardous	1,164,624	56%	968,095	56%	20%
TOTAL	2,088,743	100%	1,722,868	100%	21%

Of the total tonnes received in 2021, 24% entered the controlled deposits owned by Tradebe, and the remaining 76% was managed and/or recovered at the treatment plants through reuse, recycling or other recovery techniques.

With regard to output in 2021, 23% of the tonnes left as recycled or recovered product, 44% was taken to other waste management sites, and the remaining 33% was taken to disposal once the options of treatment or transfer to other sites were depleted.

TOTAL OUTPUT BY DESTINATION (tonnes)⁸

Product	269,683	23%
Other management sites - Tradebe	50,042	4%
Other management sites- third parties	143,495	12%
Disposal - Tradebe	63,851	6%
Disposal - third parties	311,997	27%
Other	316,471	27%
TOTAL OUTPUT	1,155,539	100%

⁸ See footnote 5

4.9.

CLIMATE CHANGE AND MANAGEMENT OF OTHER EMISSIONS

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

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

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

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

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

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

EMISSIONS MANAGEMENT

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

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

Greenhouse Gas (GHG) emissions are classified as follows:

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

The summary of emissions in 2021 is shown below⁹:



	2021
Scope 1: Direct emissions	75.116
Scope 2: Indirect emissions	18.140
Other emissions	
NO _x	1.376
SO _x	106
Volatile Organic Compounds (COVs)	69
Hazardous air pollutants (HAPs)	33
Particulate Matter (PM)	44

The Volatile Organic Compounds resulting from the organic processes carried out in the chemical treatment plants (production of chemicals and liquid fuel) are regularly monitored by plant employees in order to ensure that they do not exceed the emissions allowed by the relevant environmental authorities.

⁹ See footnote 5.

The emission factors used for the calculation of the carbon footprint of the indicated scopes are taken from the GHG protocol.

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

4.10. BIODIVERSITY PROTECTION

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

As mentioned in the Code of Ethics, at Tradebe we are aware of the importance of the environment both for society and for our activities. In this regard, we will always respect the legislation applicable in each territory in environmental matters, even when its internal regulations are stricter than the existing legislation in a given country.

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 of the environment.

An example of this is the biodiversity protection study carried out at Tradebe Vallbona, where protected species and species of special interest have been identified in order to ensure their preservation and that Tradebe's activities have the least possible impact on them.

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

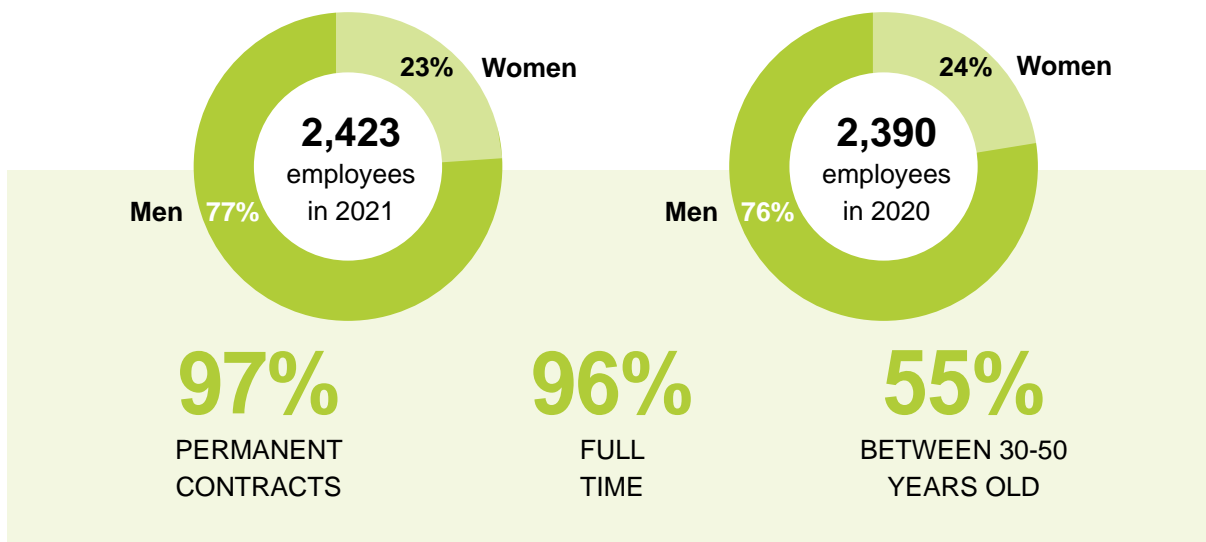
- Wildlife inventories
- Habitat mapping
- Census and status of fish populations
- Determination of ecological flows
- Limnological studies in lakes, reservoirs and ponds, including issues of environmental restoration.





**SOCIAL
AND STAFF
ISSUES**

As at 31st December 2021, Tradebe has 2,423 employees (2,390 in 2020).



5.1. MANAGEMENT APPROACH

Tradebe has a firm commitment and obligation to create and maintain a working environment where people are treated with dignity and respect. Tradebe's employees are a key asset to the development of the business, and it is for this reason that social and employee matters have been considered as a material aspect of the non-Financial Information Statement.

Employee-related matters have a global coverage and impact on the organisation.

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

- Policies implemented by the organisation regarding social and employee matters
- Work organisation
- Health and safety
- Social relations
- Training
- Universal accessibility for people with disabilities
- Equality

5.2. POLICIES ON SOCIAL AND EMPLOYEE MATTERS

Tradebe's is committed to attracting and hiring the right people, involving them in the organisation's project and supporting them to achieve their professional goals.

As a group dedicated to the provision of environmental services and with a strong entrepreneurial character, Tradebe's employees are an essential component of the organisation's success; they are the heart of the company and its most important asset.

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

At Tradebe there is no room for discrimination, harassment, bullying or victimisation, nor a climate of insecurity and poor work performance that these negative practices provoke.

Tradebe's policies on social and employee matters are taken very seriously, and each employee has their own area of responsibility in this regard. Wilful failure to follow these policies, or any evidence of discrimination, harassment, bullying or victimisation is unacceptable and sanctionable.

Among the policies on social and employee issues, Tradebe has a **Code of Ethics** that includes the organisation's holistic philosophy and values and aims to ensure Tradebe's long-term success worldwide through appropriate employee conduct. The Code of Ethics is given to all new employees so that they are aware of the core values of the organisation and provides a framework for employee behaviour in the day-to-day operations of the company.

In addition to the Code of Ethics, there are other policies and guidelines on social and employee matters within the organisation:

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

Tradebe's social and employee matters are focused on managing and mitigating a range of risks, including:

- Existence of a gender wage gap
- Failure to respect the right to equality
- Harassment and/or discrimination of any kind
- Failure to respect collective bargaining agreements
- Unsafe working conditions

Under strong and experienced leadership regarding social and employee matters, Tradebe promotes **communication and dialogue** with the aim of continuous improvement of its employees and the organisation as a whole. All employees have access to any member of the Executive Committee to discuss their ideas and concerns.

Risks associated with employee matters are low due to the control mechanisms in place, including the dual approval mechanism required for recruitment, discipline, compensation, dismissal and other employee-related actions.

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

5.3. WORK ORGANISATION

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

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

As the containment measures resulting from the COVID-19 pandemic came into effect from early 2020, the group has provided sufficient resources (i.e., technology) and created the necessary conditions to enable employees whose roles allow it to work remotely, thereby ensuring business continuity. Similarly, efforts have been made to overcome the challenge of having work teams located in multiple locations and time zones, and to ensure that employees can follow individual working hours and enjoy a work-life balance.

Absenteeism and sick leave due to COVID

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

ABSENCE RATE BY COUNTRY	Germany	United States	Spain	Italy	United Kingdom
TOTAL	2.37%	3.50%	8.97%	1.03%	2.90%
Absence hours	1,592	61,464	98,504	544	42,866

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

In 2021, a total of 409 employees were off sick due to COVID (367 in 2020).

5.4. HEALTH AND SAFETY

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

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

- Nothing is worth getting injured over
- All accidents and potentially hazardous situations can be prevented.
- Safety must be actively managed

To reinforce and extend this culture throughout the organisation, the group has developed the 7 Life-Saving Rules, which represent its fundamental aspects. These rules cover the highest risk activities and apply to both workers and contractors alike.



Such activities include 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, and exposure to chemical substances.

EMPLOYEE HEALTH AND SAFETY

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

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

HEALTH AND SAFETY STATISTICS

Of the 537 incidents reported this year (610 in 2020), 59% correspond to incidents in equipment or facilities that have not caused personal injuries (65% in 2020), 20% correspond to personal injuries that have been resolved with first aid (23% in 2019) and the remaining 21% correspond to incidents reported to the relevant authorities and facility inspections. The incidents reported include, amongst others, accidents involving time off work, low-intensity combustion, hydrocarbon splashes or spillage on the ground. All of these have been dealt with and remediated appropriately.

With a focus on safety, the application of the 7 Life-Saving Rules and as a result of intensive awareness campaigns, 3,560 Near Misses were identified and reported internally in 2021¹⁰ (close to 3,000 in 2020). 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 for the group (the higher the number of Near Misses detected, the lower the number of serious accidents, thanks to early detection and prevention¹¹).

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

¹⁰ For the purposes of this report, Near Misses correspond to those abnormal events that occur abruptly and unexpectedly, interrupting normal operations, and which, if they had not, by chance or otherwise, been identified and managed in time, would foreseeably have caused injury or damage to the facilities.

¹¹ Based on “Bird’s Pyramid” or accident theory (Frank E. Bird, 1969).

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

Occupational injuries or illnesses	2021			2020		
	Spain	United Kingdom	United States	Spain	United Kingdom	United States
Number of deaths resulting from an occupational accident injury	0	0	0	0	0	0
Rate of deaths resulting from an occupational accident injury	0	0	0	0	0	0
Number of occupational injuries with major consequences (excluding fatalities)	0	0	2	0	0	3
Rate of occupational injuries with major consequences (excluding fatalities)	0	0	1	0	0	1
Number of recordable occupational injuries	32	4	31	19	9	19
Recordable occupational injury rate	33*	3	16	17*	5	9

Fatality rate per occupational injury = (number of fatalities resulting from occupational injury/number of hours worked) * 10⁶

Major industrial accident injury rate not including fatalities = (Number of occupational injuries with major consequences not including fatalities/number of hours worked) * 10⁶

Recordable occupational injury rate = (Number of recordable occupational injuries/number of hours worked) * 10⁶ in Spain and the UK, recordable accidents are assimilated to accidents with sick leave.

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

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

CORONAVIRUS CRISIS MANAGEMENT (COVID-19) AND RISK ASSESSMENT

As an essential service provider, Tradebe closely monitors the impact of COVID-19 on the business and supply chain, working hard to minimise the impact of the pandemic on the business. The organisation has continued to provide essential services, with the highest priority being the protection of the health, safety and welfare of its employees, its customers and the business we serve.

During the crisis, there is a risk to employee health as a result of coronavirus transmission in the workplace. The Tradebe team has developed risk assessments of its employees, especially for those who carry out frontline activities and are therefore most exposed. Consequently, control measures have been identified and appropriate protocols and guidelines have been developed. The main measures adopted include:

- Personal Protective Equipment (PPE)
- Face masks
- Social distancing (including remote working where possible and adapting work locations and shifts to ensure social distancing). This includes the use of virtual solutions for communications with colleagues and co-workers, rather than face-to-face meetings.
- Hand hygiene
- Specific hygiene measures in the workplace, common areas and shared vehicles.
- Travel and movement restrictions.
- Communication (i.e., public health information), support and employee training on specific COVID-19 issues.
- Review of ventilation systems and definition of maximum room capacity.
- PCR and/or antigen testing for our employees, upon request of certain customers.
- Coordination with partners who have to visit Tradebe facilities.
- *In itinere* (commuting) recommendations for all employees.
- Communication of the criteria for following the measures established by official bodies (official symptoms, definition of close contact, quarantine period, self-declarations to allow mobility during restrictions, etc.).



5.5.

SOCIAL RELATIONS

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

- In Spain, 95% of employees are covered by collective bargaining agreements where social dialogue is carried out through the Legal Representation of Workers in each company, which takes the form of Workers' Delegates or Committees.
- In the United States, Tradebe works with the unions under 5 different labour contracts. Tradebe negotiates each labour contract with the different unions, with its own rules and agreements. In general, labour contracts are negotiated for a period of 3 years, but this can change if both parties agree. Additional negotiations can also take place if there is a need to cover specific issues.

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

- In Italy, social dialogue takes place at two levels: industrial (the most important) and company level, or district level in some cases. In the case of Tradebe, only the agreement at industry level, called "*Contratto Collettivo Nazionale Lavoro*", applies. This agreement is negotiated between the Federchimica employers' association and the national trade unions.
- The social dialogue in the UK and Germany is slightly different. In the case of Germany, collective bargaining does not apply, whereas in the UK there are no collective bargaining agreements but there is a trade union at the Scotoil plant, and there are employees at other plants (Inutec, Fawley and Knottingley) who are union members.

5.6.

TRAINING

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

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

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

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

Tradebe needs to maintain and develop its quality, and is aware that this can only be achieved in the appropriate context of learning and knowledge management. It is essential not only to have the right people, but also to be able to train them and develop the professional skills necessary to respond quickly to the needs that arise. The training policy consists of a set of organisational guidelines and procedures that organise and give coherence to the training actions required to meet these needs.

Training contributes substantially to the development of the group and to creating an environment that stimulates innovation, a key factor for the future. In 2021, Tradebe provided 37,570 hours of training to its employees (32,353 hours in 2020) in health and safety, languages and professional skills.

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

TRAINING BY GENDER AND CONTENT

	2021			2020		
	F	M	Total	F	M	Total
EXTERNAL TRAINING	8,424	13,297	21,720	5,547	15,119	20,665
Health and Safety	215	1,774	1,989	502	5,837	6,339
Languages	6,485	4,750	11,237	2,520	2,019	4,539
Professional	627	3,108	3,735	359	3,247	3,606
Social skills	81	1,802	1,883	2,068	753	2,821
Technical training	1,014	1,864	2,877	98	3,263	3,361
INTERNAL TRAINING	3,064	12,786	15,850	2,158	9,529	11,687
Health and Safety	2,431	11,108	13,539	1,901	8,590	10,492
Professional	10	15	25	0	0	0
Social skills	607	1,493	2,101	257	939	1,196
Technical training	15	170	185	0	0	0
Total	11,488	26,083	37,570	7,705	24,648	32,353

HOURS OF TRAINING BY SUBJECT AND PROFESSIONAL CATEGORY

2021						
	Health and Safety	Languages	Professional	Social skills	Technical training	Total
Management	218	632	16	100	189	1,155
Middle management	3,771	4,022	557	1,300	800	10,450
Professionals	762	3,508	214	1,966	346	6,796
Technicians	2,980	1,102	128	197	276	4,683
Administration	1,408	899	45	248	264	2,864
Production	6,389	1,074	2,800	172	1,187	11,623
Total	15,528	11,237	3,760	3,983	3,062	37,570

2020						
	Health and Safety	Languages	Professional	Social skills	Technical training	Total
Management	1,434	602	71	627	222	2,956
Middle management	4,312	1,684	741	2,122	304	9,163
Professionals	7,040	495	2,316	758	2,380	12,988
Technicians	709	1,127	122	140	12	2,109
Administration	3,250	365	232	204	443	4,493
Production	87	266	124	165	0	642
Total	16,831	4,539	3,606	4,016	3,361	32,353

5.7.

UNIVERSAL ACCESSIBILITY FOR PEOPLE WITH DISABILITIES

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

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

5.8. EQUALITY

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

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

Tradebe's Equality Policy is designed to implement the organisation's commitment to equal opportunities. Each employee has a responsibility to ensure that their behaviour is conducted in accordance with expected standards and reflects the commitments set out in the policy.

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

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

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



5.9.

EMPLOYEE STATISTICS AS AT 31ST DECEMBER 2021¹²

DISTRIBUTION OF STAFF BY COUNTRY

	2021	2021 (%)	2020	2020 (%)
United States	844	35%	810	33%
United Kingdom	842	35%	888	37%
Spain and France	689	28%	649	27%
Oman	0	0%	5	0%
Italy	27	1%	17	1%
Germany	21	1%	21	1%
Total	2,423	100%	2,390	100%

DISTRIBUTION OF STAFF BY AGE

	2021	2021 (%)	2020	2020 (%)
<30	325	13%	325	14%
30-39	571	24%	575	24%
40-50	717	30%	763	32%
>50	810	33%	727	30%
Total	2,423	100%	2,390	100%

DISTRIBUTION OF STAFF BY GENDER AND PROFESSIONAL CATEGORY

	2021				2020			
	F (%)	M (%)	Total		F (%)	M (%)	Total	
Management	18%	82%	49	2%	25%	75%	44	2%
Middle management	22%	78%	487	20%	19%	81%	495	21%
Professionals	48%	52%	187	8%	48%	52%	185	8%
Technicians	23%	77%	371	15%	25%	75%	382	16%
Administration	77%	23%	281	12%	79%	21%	305	13%
Production	6%	94%	1,048	43%	4%	96%	979	41%
Total	23%	77%	2,423	100%	24%	76%	2,390	100%

¹² Considering all employees as at 31st December 2021, including trainees. No annual average is reported as the variation between the total number of employees at the end of the financial year and the number of employees as an annual average is not significant, and the company's activity is not subject to seasonality and turnover.

DISTRIBUTION OF STAFF BY AGE AND PROFESSIONAL CATEGORY

	2021					2020				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Management	0%	4%	55%	41%	49	0%	7%	61%	32%	44
Middle management	7%	20%	37%	37%	487	6%	21%	40%	33%	495
Professionals	13%	28%	28%	31%	187	8%	34%	30%	28%	185
Technicians	28%	27%	19%	26%	371	31%	26%	20%	22%	382
Administration	10%	24%	31%	35%	281	11%	27%	31%	31%	305
Production	13%	24%	29%	34%	1,048	13%	23%	32%	32%	979
Total	13%	24%	31%	30%	2,423	14%	24%	32%	30%	2,390

DISTRIBUTION OF STAFF BY PROFESSIONAL CATEGORY AND CONTRACT TYPE

	2021				2020			
	Permanent	Temporary	Trainees	Total	Permanent	Temporary	Trainees	Total
Management	49	0	0	49	44	0	0	44
Middle management	478	8	1	487	483	11	1	495
Professionals	181	4	2	187	179	6	0	185
Technicians	355	14	2	371	363	17	2	382
Administration	275	3	3	281	289	15	1	305
Production	1,004	41	3	1,048	938	39	2	979
Total	2,342	70	11	2,423	2,296	88	6	2,390
Total (%)	97%	3%	0%		95%	4%	1%	

DISTRIBUTION OF STAFF BY CONTRACT TYPE, GENDER AND AGE

	2021				2020			
	Permanent	Temporary	Trainee/ intern	Total	Permanent	Temporary	Trainee/ intern	Total
<30	294	22	9	325	296	24	5	325
Women	73	6	3	82	79	10	1	90
Men	221	16	6	243	217	14	4	235
30-39	551	18	2	571	554	20	1	575
Women	143	7	2	152	156	8	1	165
Men	408	11	0	419	398	12	0	410
40-50	702	15	0	717	737	26	0	763
Women	172	5	0	177	180	8	0	188
Men	530	10	0	540	557	18	0	575
>50	795	15	0	810	709	18	0	727
Women	154	2	0	156	124	5	0	129
Men	641	13	0	654	585	13	0	598
TOTAL	2,342	70	11	2,423	2,296	88	6	2,390
Women	542	20	5	567	539	31	2	572
Men	1,800	50	6	1,856	1,757	57	4	1,818

DISTRIBUTION OF STAFF BY PROFESSIONAL CATEGORY AND WORKING HOURS

	2021			2020		
	Full-time	Part-time	Total	Full-time	Part-time	Total
Management	49	0	49	44	0	44
Middle management	480	7	487	486	9	495
Professionals	174	13	187	176	9	185
Technicians	355	16	371	362	20	382
Administration	244	37	281	262	43	305
Production	1,027	21	1,048	963	16	979
Total	2,329	94	2,423	2,293	97	2,390
Total (%)	96%	4%		96%	4%	

NUMBER OF DISMISSALS BY GENDER AND AGE

	2021					2020				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Women	22	24	17	10	73	21	25	14	23	83
Men	45	56	49	57	207	73	67	102	66	308
Total	67	80	66	67	280	94	92	116	89	391

NUMBER OF DISMISSALS BY COUNTRY AND GENDER

	2021			2020		
	Women	Men	Total	Women	Men	Hombres
United States	14	99	113	20	75	95
United Kingdom	9	39	48	35	106	141
Spain and France	49	66	115	27	76	103
Italy	0	1	1	0	0	0
Germany	1	1	2	0	0	0
Oman	0	1	1	1	51	52
Total	73	207	280	83	308	391

NUMBER OF DISMISSALS BY PROFESSIONAL CATEGORY

	2021			2020		
	Women	Men	Total	Women	Men	Total
Management	2	0	2			0
Middle management	5	39	44	12	41	53
Professionals	11	5	16	6	9	15
Technicians	21	31	52	16	59	75
Administration	16	4	20	35	14	49
Production	18	128	146	14	185	199
Total	73	207	280	83	308	391

AVERAGE REMUNERATION¹³ BY PROFESSIONAL CATEGORY AND AGE - EUROPE (GERMANY, FRANCE, SPAIN AND ITALY) (EUR/year)

	2021					2020				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Middle management	20,545	53,505	54,066	62,934	55,287	20,917	49,252	50,699	59,818	50,493
Women	15,000	42,244	49,068	44,894	46,099	24,000	41,789	43,827	55,523	42,655
Men	21,654	60,671	56,565	65,940	58,733	19,889	56,094	53,331	60,161	53,367
Wage gap (F:M) (*)	69%	70%	87%	68%	78%	121%	74%	82%	92%	80%
Professionals	23,343	40,679	42,089	48,463	39,741	39,033	40,602	42,661	54,744	43,458
Women	26,420	38,329	42,961	47,062	38,918	21,050	41,028	40,698	42,767	39,480
Men	15,650	42,668	41,107	51,265	40,695	75,000	40,262	46,587	63,727	48,193
Wage gap (F:M) (*)	169%	90%	105%	92%	96%	28%	102%	87%	67%	82%
Technicians	19,735	25,862	36,115	42,845	30,322	18,897	22,863	26,106	31,791	23,801
Women	18,703	25,265	28,129	30,096	25,273	19,368	20,369	20,613	23,428	20,403
Men	20,767	26,586	41,439	50,813	34,810	18,224	25,000	30,101	36,809	26,831
Wage gap (F:M) (*)	90%	95%	68%	59%	73%	106%	81%	68%	64%	76%
Administration	14,855	22,456	24,808	28,826	23,869	17,576	20,471	23,956	25,503	22,439
Women	18,963	21,586	24,991	28,826	24,812	17,682	19,242	23,621	25,503	22,483
Men	14,170	24,318	22,735	0	20,216	17,450	23,338	27,976	0	22,229
Wage gap (F:M) (*)	134%	89%	110%	n/a	123%	101%	82%	84%	n/a	101%
Production	21,255	23,394	25,267	25,911	24,649	22,549	22,621	23,722	23,979	23,393
Women	19,733	22,548	30,023	19,589	22,816	20,133	22,425	23,438	15,993	21,182
Men	21,635	23,475	25,053	26,367	24,795	22,970	22,634	23,736	24,342	23,531
Wage gap (F:M) (*)	91%	96%	120%	74%	92%	88%	99%	99%	66%	90%

AVERAGE REMUNERATION¹⁴ BY PROFESSIONAL CATEGORY AND AGE - UNITED KINGDOM (£/year)

	2021					2020				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Middle management	42,619	51,698	52,446	60,662	55,936	35,015	52,732	57,400	61,893	57,657
Women	0	58,092	56,251	67,514	59,166	0	62,517	57,315	56,065	58,971
Men	42,619	47,588	51,139	60,016	55,136	35,015	48,538	57,432	62,236	57,351
Wage gap (F:M) (*)	0%	122%	110%	112%	107%	0%	129%	100%	90%	103%
Professionals	35,523	46,680	52,933	54,065	51,149	49,458	39,974	44,246	54,611	47,233
Women	35,382	43,182	52,001	45,640	45,573	45,436	39,960	42,565	49,961	43,785
Men	35,875	50,178	53,515	59,120	55,246	65,550	39,993	45,409	56,724	50,081
Wage gap (F:M) (*)	99%	86%	97%	77%	82%	69%	100%	94%	88%	87%
Technicians	27,546	32,369	34,969	34,036	31,290	25,663	28,258	32,761	36,271	29,486
Women	27,432	32,347	27,362	32,679	29,460	25,389	26,129	29,343	29,537	26,393
Men	27,580	32,377	37,143	34,178	31,787	25,750	29,636	34,005	36,540	30,438
Wage gap (F:M) (*)	99%	100%	74%	96%	93%	99%	88%	86%	81%	87%
Administration	22,568	25,506	25,000	24,335	24,532	23,629	24,652	25,196	23,897	24,253
Women	22,206	25,294	23,840	23,788	23,932	21,452	24,145	23,145	23,565	23,392
Men	23,110	25,788	26,159	26,125	25,677	26,532	25,285	29,708	25,555	26,310
Wage gap (F:M) (*)	96%	98%	91%	91%	93%	81%	95%	78%	92%	89%
Production	25,013	26,558	27,388	27,333	26,853	24,788	25,182	25,161	25,824	25,360
Women	24,558	24,320	25,456	24,651	24,619	26,694	24,029	16,099	24,544	22,841
Men	25,056	26,760	27,453	27,429	26,976	24,667	25,235	25,513	25,856	25,458
Wage gap (F:M) (*)	98%	91%	93%	90%	91%	108%	95%	63%	95%	90%

(*) In all cases, the pay gap is calculated as: (average female pay/average male pay) *100.

¹³ Average remuneration takes into account base salary plus variable remuneration.

¹⁴ See note 12

AVERAGE REMUNERATION¹⁵ BY PROFESSIONAL CATEGORY AND AGE - UNITED STATES (\$/year)

	2021					2020				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Middle management	54,663	71,172	97,582	101,306	87,723	57,436	72,469	95,905	91,323	85,974
Women	55,989	64,219	86,628	81,804	74,518	51,460	71,523	88,533	76,518	77,979
Men	54,147	73,490	100,889	104,460	91,224	58,183	72,729	97,379	93,200	87,432
Wage gap (F:M) (*)	103%	87%	86%	78%	82%	88%	98%	91%	82%	89%
Professionals	57,870	78,535	83,142	94,209	78,582	50,114	71,699	92,457	107,762	84,225
Women	62,362	69,697	92,597	84,546	76,352	47,794	67,254	91,750	78,017	72,819
Men	52,480	85,410	75,578	113,535	81,005	55,915	75,032	93,007	129,009	94,316
Wage gap (F:M) (*)	119%	82%	123%	74%	94%	85%	90%	99%	60%	77%
Technicians	44,296	53,445	58,206	70,750	57,655	37,704	49,677	55,283	64,087	51,417
Women	44,075	53,985	56,663	93,737	54,366	38,280	59,060	58,236	96,269	49,594
Men	44,367	53,391	58,398	69,601	58,105	37,390	47,702	54,964	62,718	51,793
Wage gap (F:M) (*)	99%	101%	97%	135%	94%	102%	124%	106%	153%	96%
Administration	36,385	40,943	42,534	45,984	42,877	33,021	37,863	42,905	43,172	40,815
Women	35,344	38,376	41,481	41,816	40,296	32,305	36,067	41,986	38,800	38,465
Men	45,760	51,211	52,709	62,658	56,542	38,750	55,225	47,655	59,023	53,474
Wage gap (F:M) (*)	77%	75%	79%	67%	71%	83%	65%	88%	66%	72%
Production	40,426	46,199	47,620	50,447	46,807	36,705	42,057	44,114	46,847	43,654
Women	45,126	37,529	37,835	0	38,966	33,488	35,492	0	0	34,490
Men	40,222	47,263	47,904	50,447	47,151	37,049	42,549	44,114	46,847	43,908
Wage gap (F:M) (*)	112%	79%	79%	0%	83%	90%	83%	0%	0%	79%

(*) In all cases, the pay gap is calculated as: (average female pay/average male pay) *100.

AVERAGE MANAGEMENT REMUNERATION¹⁶

	2021			2020		
	Women	Men	Total	Women	Men	Total
España (€)	125,502	141,621	138,117	114,606	135,900	131,061
Reino Unido (£)	96,250	150,421	145,496	124,375	110,763	144,142
Estados Unidos (\$)	214,250	298,272	281,467	249,577	275,250	370,427

At the end of 2021 there were 49 employees with a declared disability (40 employees at the end of 2020).

¹⁵ See note 12

¹⁶ Includes members of the Executive Board of Directors and Management Committee. Considered as basic salary plus variable remuneration.



**HUMAN
RIGHTS**

Tradebe has a firm commitment and obligation to ensure the respect for human rights in all aspects and in all areas of the organisation. This principle is considered to be of fundamental importance and has therefore been considered as a material aspect of the Non-Financial Information Statement.

6.1. MANAGEMENT APPROACH

In general, Tradebe is committed to transparency in the way it obtains and manages employee and stakeholder information and complies with all requirements of data protection laws.

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

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

Tradebe takes measures to ensure compliance with the labour standards contained in the ILO core conventions, and will not tolerate contrary practices, 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 hire those persons who are legally authorised to do so.

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

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

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

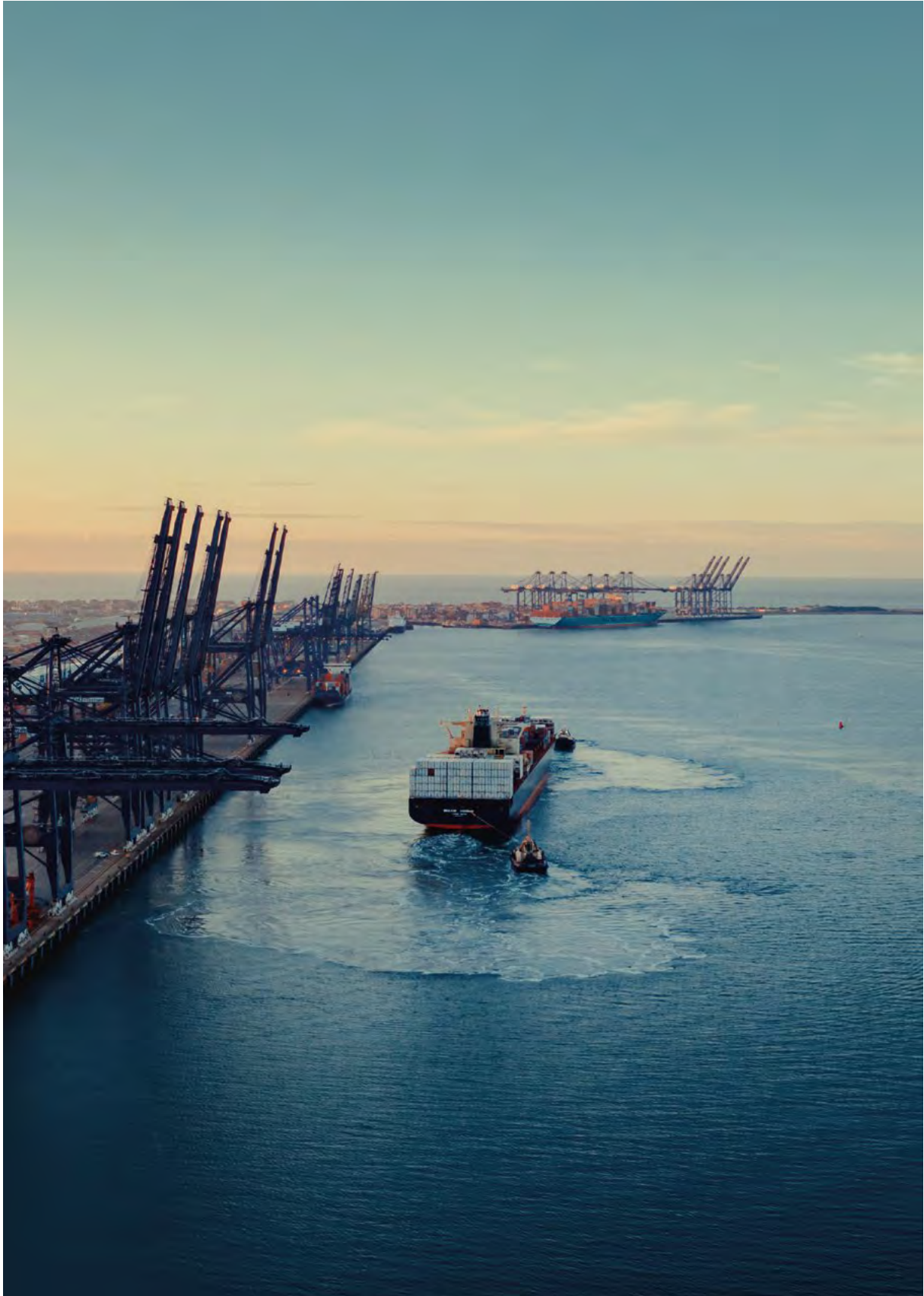
Although the risks associated with slavery and human trafficking are very low or non-existent in Tradebe's business, there is a legal requirement in the UK for suppliers to be assessed in this regard and to comply with the principles set out (*UK Modern Slavery Act 2015*). The latest published report 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. For this purpose, robust practices are in place to combat slavery and human trafficking both in the organisation's operations and throughout the supply chain.


6.2. IMPLEMENTING HUMAN RIGHTS DUE DILIGENCE PROCEDURES

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

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

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



The image features a background of an industrial facility, possibly a refinery or chemical plant, with various pipes, tanks, and structural elements. A large, semi-transparent green rectangle covers the left and central portions of the image. Overlaid on this green area is a large, white, stylized number '7'. The text 'COMBATTING CORRUPTION AND BRIBERY' is written in a bold, black, sans-serif font, positioned below the green area and partially overlapping the white number '7'.

7 COMBATTING CORRUPTION AND BRIBERY

7.1.

MANAGEMENT APPROACH

Tradebe has a firm commitment and obligation to fight corruption and bribery in all aspects and in all areas of the organisation. This principle is considered to be of fundamental importance and has therefore been considered as a material aspect of the Non-Financial Information Statement.

The organisation is developing a *whistleblowing* channel for reporting irregularities and legal breaches. There are no known whistleblowing complaints in 2021 (and none were received in 2020).

7.2.

GROUP POLICIES ON COMBATTING CORRUPTION AND BRIBERY

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

CODE OF ETHICS AND INTERNAL POLICIES

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

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

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

CRIMINAL COMPLIANCE

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

Since then, significant steps have been taken towards a current Compliance system, which includes, among others, the existence of a protocol for managing the channel for complaints and internal investigations in order to uncover offences committed by employees, managers and/or partners and, where appropriate, to become aware of and sanction any infringements that may occur, so that any employee can bring such circumstances to the attention of the Group's Ethics Committee so that it may take the appropriate measures.

7.3. POLICY OUTCOMES

The results of the group's policies on bribery and corruption are entirely satisfactory so far, with no reportable incidents detected during 2021.

7.4. RISKS

The range of corruption and bribery risks faced by the group is varied 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.

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

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

7.5. MEASURES TAKEN TO PREVENT CORRUPTION AND BRIBERY

As indicated in point 1 above, the group has worked at three different levels to prevent corruption and bribery in all its forms, which include:

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

7.6.

MEASURES TO COMBAT MONEY LAUNDERING

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

No money laundering cases were detected in 2021.

7.7.

CONTRIBUTIONS TO FOUNDATIONS AND NON-PROFIT ORGANISATIONS

Tradebe works on and promotes different solidarity initiatives:

- **Donation of solidarity bottle tops:** The caps are made of high-density polyethylene, a type of high-quality plastic which is valuable in the market as it can be reused in packaging, packing, the electrical and automotive industry, as well as other sectors.

15 big-bags (industrial sacks of 1m³ capacity) of recycled bottle tops have been collected thanks to the collaboration of several cruise companies that dock at the Port of Barcelona, who joined the initiative by separating the bottle tops and donate them to a good cause. The bottle tops were taken to a recycling company, which paid market price. The amount obtained from these bottle tops will be donated in full to the solidarity initiative led by the Port of Barcelona “*Contenedor Solidari del Port de Barcelona*” (*Port of Barcelona Solidarity Container*).

- **Solidarity donation of computer equipment:** Tradebe has donated 67 laptops, 29 tower computers, 11 keyboards and 10 screens to the NGO *Noves Tecnologies per Àfrica* (*New Technology for Africa*). This NGO provides mainly schools in African countries with computers so that children are not excluded from technological progress.

- **Christmas Jumper Day:** in December, a charity breakfast was organised among employees, with the proceeds going to the Save the Children charity organisation.
- **Solidarity campaign to donate to the Confederation of Mental Health in Spain**
- **Charitable donations of toys:**
 - At Christmas, the Merrillville office collaborated with the Angel Tree charity to deliver Christmas gifts to less fortunate families in the area.
 - The Hobart Street office in Meriden also led a toy drive where \$1,600 was raised to purchase toys for Operation Homefront.



7.8. MEMBERSHIP OF INDUSTRY ASSOCIATIONS

Tradebe is a member of the following industry associations:

- Environmental Services Association (2021 membership fee: 12,500 GBP)
- CT Environmental Forum (2021 membership fee: 200 USD)
- Asociación de Empresas Gestoras de Residuos y Recursos Especiales (ASEGRE) (2021 fee: 6,867 euros)
- Associació Catalana d'Instal·lacions de Tractament de Residus Especials (ACITRE) (2021 membership fee: 6,050 euros)
- ACLIMA, a benchmark and umbrella organisation for the eco-industry and environmental services and products in the Basque Country. (2021 membership fee: 3,684 euros)
- Catalan Chemical Industry Federation (FEDEQUIM) (2021 fee: 268 euros)
- Euroshore (2021 membership fee: 3,000 euros)
- National Association of Marpol Agents (ANAM) (2021 membership fee: 11,536 euros)

08

SOCIETY



8.1. MANAGEMENT APPROACH

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

8.2. COMMITMENT TO SUSTAINABLE DEVELOPMENT

Due to the existing regulatory framework in the sector, the risks of compromising local development are considered low. However, the risk of an environmental incident occurring is considered high and Tradebe invests significant resources to monitor and mitigate these risks, as explained in the section on environmental matters.

In accordance with RD56/2016 on energy audits are carried out every four years at *Tradebe España*, which detail actions to improve the consumption and efficiency of the facilities.

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

8.3. OUTSOURCING AND SUPPLIERS

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

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

It is prohibited to favour or authorise choosing one supplier over another in order to obtain an undue advantage. All decisions must be technically and economically substantiated, and favouritism of any kind is prohibited. In this regard, as indicated in the Code of Ethics, quality, price, ethics, integrity, compliance and experience are the only selection criteria applicable to these relationships.

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

Environmental issues also have a place in the organisation's purchasing policy. For example, the company car policy establishes a limit on CO₂ emissions so that buying or leasing vehicles that exceed 160 grams of CO₂ is not permitted.

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

8.4. CLIENTS

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

Customer service is a value of the organisation. All ISO 9001 quality certifications guarantee maximum level of satisfaction, in compliance with requirements and expectations.

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

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

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

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

8.5.

IMPACT OF ACTIVITY ON LOCAL POPULATIONS AND THE TERRITORY

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

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

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

8.6.

TAX INFORMATION

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

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

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

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

2021							
(Thousands of euros)	Spain	United States	United Kingdom and Oman	Italy	Germany	Consolidation adjustments	Total
Profit from continuing operations	12,548	3,954	9,474	-1,223	458	-4,428	20,783
Operating subsidies included in profit or loss	-	-	-	-	-	-	-
Allocation of fixed asset subsidies	-	-	-	-	-	-	-

2020							
(Thousands of euros)	Spain	United States	United Kingdom and Oman	Italy	Germany	Consolidation adjustments	Total
Profit from continuing operations	24,346	-16	3,703	-1,282	-1,836	-8,653	16,262
Operating subsidies included in profit or loss	195	-	1,047	-	-	-	1,242
Allocation of fixed asset subsidies	34	-	-	-	-	-	34

In 2021, the group has paid a total of 3,318 thousand euros (2020: 2,053 thousand euros) in corporate income tax¹⁷.

¹⁷ Includes the settlement for the financial year 2020 and payments on account for the financial year 2021.

APPENDIX I

COMPANIES INCLUDED IN THE CONSOLIDATED FINANCIAL STATEMENTS

The scope of consolidation comprises the following companies:

EUROPE

SPAIN

- GRUPO TRADEBE MEDIO AMBIENTE, S.L. Parent Company (**GTMA**)
- ASESORAMIENTO Y SERVICIOS DE EXPLOTACIÓN, S.L. (**ASE**)
- ATLAS GESTIÓN MEDIOAMBIENTAL, S.A. (**ATLAS**)
- BIOCOMPOST DE LUGO, S.L. (**BIOCOMPOST**)
- ECOLOGIA QUIMICA, S.A. (**EQ**)
- ECOLÓGICA IBÉRICA Y MEDITERRANEA, S.A. (**ECOIMSA**)
- ECOMARPOL, S.L.U. (**ECOMARPOL**)
- ECOPROGES, S.L. (**ECOPROGES**)
- EDAFO GM, S.A. (**EDAFO**)
- ENVILAND MEDIO AMBIENTE, S.L. (**ENVILAND**)
- FRAGNOR, S.L. (**FRAGNOR**)
- FUNDACIÓ PRIVADA TRADEBE (**FPT**)
- GESTIÓN DE MARPOL GALICIA, S.L. (**GEMARGA**)
- IGNEA MEDIOAMBIENTE, S.L. (**IGNEA**)
- INGENIERIA Y TRATAMIENTOS DE VALORIZACIÓN, S.L. (**INTRAVAL**)
- LIMPIEZAS DEL NERVIÓN, S.A. (**LINERSA**)
- LUNAGUA, S.L. (**LUNAGUA**)
- MAGMA GESTIÓN MEDIOAMBIENTAL, S.L.U. (**MAGMA GESTIÓN**)
- MAGMA TRATAMIENTOS, S.L.U. (**MAGMA TRATAMIENTOS**)
- MARPOLGAL AIE
- MEDIACIONES COMERCIALES AMBIENTALES, S.L. (**MECOAM**)
- PORT ECOREL, A.I.E. (**PORT ECOREL**)
- PROINTRAVAL, S.L. (**PROINTRAVAL**)
- SANEMAR, S.L. (**SANEMAR**)
- SERVICIOS ECOLÓGICOS DE MONZÓN, S.L. (**SEM**)
- TECNOAMBIENTE, S.L.U. (**TECNOAMBIENTE**)
- TRADEBE, S.A.
- TRADEBE GESTIÓN ESPAÑA, S.L. (**TGE**)
- TRADEBE MEDIOAMBIENTE INTERNACIONAL, S.L. (**TMI**)
- TRADEBE VALDILECHA, S.L. (**TDB VALDILECHA**)
- TRATAMIENTO Y RECUPERACIONES INDUSTRIALES, S.A. (**TRISA**)
- VALORIZACIÓN ENERGÉTICA DE GAS DE VERTEDERO, S.L. (**VEGASVERT**)

UNITED KINGDOM

- AVANTI ENVIRONMENTAL GROUP LIMITED (**AEG**)
- AVANTI ENVIRONMENTAL HOLDING LIMITED (**AEH**)
- FOURWAY MANAGEMENT LIMITED (**FOURWAY**)
- HOLLYWELL HOLDINGS LIMITED (**HOLLYWELL**)
- INUTEC LIMITED (**INUTEC**)
- LABWASTE LIMITED (**LABWASTE**)

- POLKACREST MIDLANS LIMITED (dormant) (**PML**)
- POLKACREST NORTHWEST LIMITED (dormant) (**PNWL**)
- RECHEM LIMITED (**RECHEM**)
- SCOTOIL REALISATIONS LIMITED (**SRL**)
- SCOTOIL SERVICES LIMITED (**SSL**)
- SCOTOIL SERVICES (MIDDLE EAST) LIMITED (**SCOTOIL MIDDLE EAST**)
- SOLVENTS WITH SAFETY LIMITED (**SWS**)
- TRADEBE CHEMICALS LTD
- TRADEBE DINNINGTON LTD (**TDB DINNINGTON**)
- TRADEBE ENVIRONMENTAL SERVICES LIMITED (**TES LTD**)
- TRADEBE FAWLEY LIMITED (**TDB FAWLEY**)
- TRADEBE FAWLEY MIDCO LIMITED (**TDB FAWLEY MIDCO**)
- TRADEBE GWENT LIMITED (**TDB GWENT**)
- TRADEBE HEALTHCARE NATIONAL LIMITED (**THNL**)
- TRADEBE HEALTHCARE SOUTH WEST LIMITED (**TDB HEALTHCARE SOUTH WEST**)
- TRADEBE HEALTHCARE (HOLDINGS) LIMITED (**THHL**)
- TRADEBE HEALTHCARE LIMITED (**TDB HEALTHCARE**)
- TRADEBE MANAGEMENT LIMITED (**TM LTD**)
- TRADEBE MINERALS RECYCLING LIMITED (**TMR**)
- TRADEBE NORTH WEST LIMITED (**TDB NORTH WEST**)
- TRADEBE REFINERY SERVICES LTD (**TRS**)
- TRADEBE SOLVENT RECYCLING LIMITED (**TSR**)
- TRADEBE UK LIMITED

FRANCE

- TRADEBE SARL
- TRADEBE SOLVANTS SERVICES SARL

PORTUGAL

- PSPE – SERVIÇOS PRESTADOS ÀS EMPRESAS (UNIPESSOAL), LDA (**PSPE PORTUGAL**)

GERMANY

- TRADEBE GmbH

ITALY

- TRADEBE CHIMICA SRL

AMERICA

UNITED STATES

- AARON OIL COMPANY, LLC (AOC), anteriormente denominada AARON OIL COMPANY, INC
- INTERNATIONAL HYDROCARBON SERVICES, LLC

- TRADEBE CAPITAL CORPORATION (**TCC**)
- TRADEBE ENVIRONMENTAL SERVICES, LLC (**TES, LLC**)
- TRADEBE INDUSTRIAL SERVICES, LLC (**TIS**)
- TRADEBE TRANSPORTATION LLC
- TRADEBE TREATMENT AND RECYCLING, LLC (**TTR**)
- TRADEBE TREATMENT AND RECYCLING NORTHEAST, LLC (**TTR NORTHEAST**)
- TRADEBE TREATMENT AND RECYCLING OF BATON ROUGE, LLC (**TTR BATON ROUGE**)
- TRADEBE TREATMENT AND RECYCLING OF BRIDGEPORT, LLC (**TTR BRIDGEPORT**)
- TRADEBE TREATMENT AND RECYCLING OF NASHVILLE (**TTR NASHVILLE**)
- TRADEBE TREATMENT AND RECYCLING OF NORTHBOROUGH, LLC (**TTR NORTHBOROUGH**)
- TRADEBE TREATMENT AND RECYCLING OF STOUGHTON, LLC (**TTR STOUGHTON**)
- TRADEBE TREATMENT AND RECYCLING OF TENNESSEE, LLC (**TTR TENNESSEE**)
- TRADEBE TREATMENT AND RECYCLING OF WISCONSIN, LLC (**TTR WISCONSIN**)

COLOMBIA

- TECNOAMBIENTE DE COLOMBIA, S.L. S.A.S.

ASIA

OMAN

- TRADEBE SERVICES LLC (**TRADEBE OMAN**)
- WORLDWIDE ENVIRONMENTAL SERVICES LLC (**WES LLC**)

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

- INTRAVAL - CGS
- INTRAVAL - M.J. GRUAS (**TÁRREGA**)
- INTRAVAL - DISSENY I SOSTENIBILITAT - CONSTRUCCIONES CALER
- ECOPROGES - INOCSA (**RESIDUS**)
- TECNOAMBIENTE - PUERTO DE BARCELONA
- TECNOAMBIENTE - GISA (**MÁLAGA - 2**)
- TRADEBE, S.A. - BOTAMAVI - URBASER (**MARPOLGAL**)
- INGENIERIA CREATIVA PITA, S.L. TECNOAMBIENTE S.L UTE
- INGENIERIA CREATIVA PITA, S.L. - TECNOAMBIENTE, S.L II
- TECNOAMBIENTE- ESTUDIO IMAT IBIZA
- TECNOAMBIENTE S.L – MC VALNERA S.L UTE
- TECNOAMBIENTE S.L – MC VALNERA II S.L UTE
- TECNOAMBIENTE S.L – MC VALNERA III S.L UTE
- TECNOAMBIENTE S.L – AQUATICA
- TECNOAMBIENTE S.L – ADC SERV AMBIENTALES
- UTE – ECOTRI

APPENDIX II

TABLE OF LEGAL REQUIREMENTS AND GRI STANDARDS

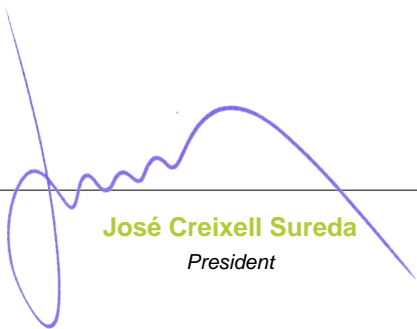
Contents of non-financial reporting law	Materiality	Paragraph of the report where a response is given	Reporting criteria: Selected GRI (2016 version unless otherwise stated).
GENERAL INFORMATION			
Description of the business model including its business environment, organisation and structure	Material	2	GRI 102-2 GRI 102-7
Markets in which it operates	Material	2.1	GRI 102-3 GRI 102-4 GRI 102-6
Organisational objectives and strategies	Material	3	GRI 102-14
Main factors and trends that may affect its future development	Material	3.3	GRI 102-14 GRI 102-15
Reporting framework used	Material	1.1	GRI 102-54
Principle of materiality	Material	1.2	GRI 102-46 GRI 102-47
ENVIRONMENT			
Environmental Management			
Management approach: Policies and risks	Material	4.1, 4.2	GRI 102-15 GRI 103-2
Current and foreseeable effects of the company's activities on the environment and, where appropriate, on health and safety.	Material	4.4	GRI 102-15
Environmental assessment or certification procedures	Material	4.1, 4.2	GRI 103-2
Resources dedicated to environmental risk prevention	Material	4.1	GRI 103-2
Application of the precautionary principle	Material	4.5	GRI 102-11
Amount of provisions and guarantees for environmental risks	Material	4.6	GRI 103-2
Pollution			
Measures to prevent, reduce or remedy emissions that seriously affect the environment; taking into account any form of activity-specific air pollution, including noise and light pollution	Material	4.9	GRI 103-2 GRI 305-7
Circular economy and waste prevention			
Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste	Material	4.7, 4.8	GRI 103-2
Actions to combat food waste	Non-material	4.7	NA
Sustainable use of resources			
Water consumption and water supply according to local constraints	Material	4.8	GRI 303-5 a (GRI Version 2018)
Consumption of raw materials and measures taken to improve the efficiency of raw material use	Material	4.4, 4.7, 4.8	GRI 301-1 GRI 301-2
Direct and indirect energy consumption	Material	4.8	GRI 302-1
Measures taken to improve energy efficiency	Material	4.9	GRI 103-2
Use of renewable energies	Material	4.8	GRI 302-1
Climate change			
Significant elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces	Material	4.9	GRI 305-1a GRI 305-2 b, c and e
Measures adopted to adapt to the consequences of climate change	Material	4.9	GRI 103-2
Voluntary medium- and long-term reduction targets set to reduce greenhouse gas emissions and the means implemented for that purpose	Material	4.9	GRI 103-2

Contents of non-financial reporting law	Materiality	Paragraph of the report where a response is given	Reporting criteria: Selected GRI (2016 version unless otherwise stated).
Biodiversity			
Biodiversity protection: Measures taken to preserve or restore biodiversity.	Material	4.10	GRI 304-3
Biodiversity protection: Impacts caused by activities or operations in protected areas	Non-material	N/A	N/A
SOCIAL AND EMPLOYEE MATTERS			
Employment			
Management approach: Policies and risks	Material	5.1	GRI 102-15 GRI 103-2
Total number and distribution of employees according to representative diversity criteria (gender, age, country, etc.)	Material	5.9	GRI 405-1 b
Total number and distribution of types of employment contracts, average annual number of permanent contracts, temporary contracts and part-time contracts by sex, age and professional category	Material	5.9	GRI 102-8 a and c
Number of dismissals by gender, age and professional category	Material	5.9	GRI 103-2
Average earnings and their development according to gender, age and professional category or equal value.	Material	5.9	GRI 103-2
Wage gap, the pay for equal or average jobs in society	Material	5.9	GRI 103-2 GRI 405-2 a
The average remuneration of directors and executives, including variable remuneration, allowances, indemnities and payments to long-term savings schemes and any other payments according to gender.	Material	5.9	GRI 103-2
Implementation of work disengagement policies	Material	5.3	GRI 103-2
Employees with disabilities	Material	5.9	GRI 405-1 b
Work organisation			
Organisation of working hours	Material	5.3	GRI 103-2
Number of hours of work absence	Material	5.3	GRI 103-2
Measures aimed at facilitating work-life balance and promoting joint parental responsibility	Material	5.3	GRI 103-2
Health and safety			
Health and safety conditions at work	Material	5.4	GRI 103-2 GRI 403-1 to 403-3 GRI 403-7 (GRI Version 2018)
Work-related injuries, frequency, and severity as well as work-related illnesses, by gender	Material	5.4	GRI 403-9 a (2018) with regard to number and rate of accidents GRI 403-10 a (GRI 2018 Version)

Contents of non-financial reporting law	Materiality	Paragraph of the report where a response is given	Reporting criteria: Selected GRI (2016 version unless otherwise stated).
Social relations			
Organisation of social dialogue, including procedures for informing and consulting with staff and negotiating with them	Material	5.5	GRI 103-2
Percentage of employees covered by collective bargaining agreements according to country	Material	5.5	GRI 102-41
The balance sheet of collective bargaining agreements, particularly in the field of health and safety at work	Material	5.5	GRI 103-2
Training			
The policies implemented in the training field	Material	5.6	GRI 103-2 GRI 404-2 a
The total number of hours of training by professional category	Material	5.6	GRI 404-1 in terms of total hours of training by occupational category
Universal accessibility			
Universal accessibility for people with disabilities	Material	5.7	GRI 103-2
Equality			
Measures taken to promote equal treatment and opportunities for women and men	Material	5.8	GRI 103-2
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	GRI 103-2
The policy against discrimination of any kind and, where appropriate, diversity management	Material	5.8	GRI 103-2
HUMAN RIGHTS			
Management approach: Policies and risks	Material	6.1	GRI 102-15 GRI 103-2
Implementation of human rights due diligence procedures; prevention of risks of human rights violations and, where appropriate, measures to mitigate, manage and redress possible infringements	Material	6.2	GRI 102-16 GRI 102-17
Complaints of human rights violations	Material	6.2	GRI 103-2 GRI 406-1
Promotion and enforcement of the provisions of the International Labour Organisation's core conventions relating to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in respect of employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour.	Material	6.1	GRI 103-2

Contents of non-financial reporting law	Materiality	Paragraph of the report where a response is given	Reporting criteria: Selected GRI (2016 version unless otherwise stated).
CORRUPTION AND BRIBERY			
Management approach: Policies and risks	Material	7.1	GRI 102-15 GRI 103-2
Measures taken to prevent corruption and bribery	Material	7.5	GRI 103-2 GRI 102-16 GRI 102-17 GRI 205-3
Measures to combat money laundering	Material	7.6	GRI 103-2 GRI 102-16 GRI 102-17
Contributions to foundations and non-profit organisations	Material	7.7	GRI 102-13
SOCIETY			
Company commitment to sustainable development			
Management approach: Policies and risks	Material	8.1	GRI 103-2
The impact of the company's activity on local employment and development	Material	8.2, 8.5	GRI 103-2
The impact of the company's activity on local populations and the territory	Material	8.5	GRI 103-2
Relations with local community stakeholders and the form of dialogue with them.	Material	8.5	GRI 102-43
Partnership or sponsorship activities	Material	7.8	GRI 103-2
Outsourcing and suppliers			
Inclusion of social, gender equality and environmental issues in purchasing policy.	Material	8.3	GRI 103-2
Consideration in relations with suppliers and subcontractors of their social and environmental responsibility	Material	8.3	GRI 102-9 GRI 103-2
Monitoring and audit systems and audit results	Material	8.3	GRI 102-9
Consumers			
Consumer health and safety measures	Material	8.4	GRI 103-2
Complaint systems, complaints received and their resolution	Material	8.4	GRI 103-2
Tax information			
Profit (loss) by country	Material	8.6	103-2
Corporate tax paid	Material	8.6	103-2
Public subsidies received	Material	8.6	GRI 201-4 a

The Group's Non-Financial Information Statement has been approved for issue in Ziórbena on 30th March 2022.



José Creixell Sureda
President



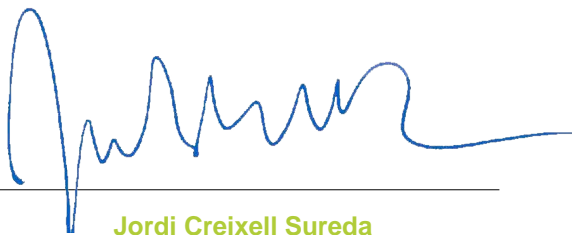
Víctor Creixell de Vilallonga
Board member



Oscar Creixell de Vilallonga
Board member



Maria Creixell de Vilallonga
Board member



Jordi Creixell Sureda
Board Secretary and member



(Translation of a Verification Report of Non-Financial Information Statement issued in Spanish and prepared under the Spanish Laws requirements. In event of a discrepancy, the Spanish language version prevails)

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

Independent verification report of the Consolidated non-financial information statement for the financial year closing on 31 December 2021

INDEPENDENT VERIFICATION REPORT OF THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT OF GRUPO TRADEBE MEDIO AMBIENTE, S.L., AND SUBSIDIARY COMPANIES FOR THE 2021 FINANCIAL YEAR

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

In accordance with Article 49 of the Commercial Code, we have conducted an independent limited assurance verification of the attached consolidated non-financial information statement (hereinafter, CNFIS) for the financial year closing on 31 December 2021 of Grupo Tradebe Medio Ambiente, S.L. and subsidiary companies (hereinafter, Tradebe Environmental Services), which forms part of the Group's Management Report.

The CNFIS includes additional information to that required by prevailing mercantile legislation governing non-financial information that has not been subject of our assurance work. In this regard, our assurance work was limited only to providing assurance on the information contained in table included in the Appendix II-Contents and relation to GRI standards included in the CNFIS.

Responsibility of the directors

It is the responsibility of the directors of Tradebe Environmental Services to prepare the company's CNFIS and Management Report. The CNFIS was prepared in accordance with the provisions set forth in current commercial regulations and following the criteria of the Sustainability Reporting Standards of the Global Reporting Initiative (GRI) selected and described for each matter in the table included in Appendix II-Contents and relation to GRI standards of the CNFIS.

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

The directors of Tradebe Environmental Services are also responsible for defining, implementing, adapting, and maintaining the management systems from which the information required to prepare the CNFIS is extracted.

Our independence and quality control

We have met the requirements of independence as well as all the other requirements of the Code of Ethics for Professionals Accountants issued by the International Ethics Standards Board for Accountants and based on the

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

Our firm applies the International Standard on Quality Control 1 (ISQC 1) and, therefore, maintains a global quality control system that includes policies and documented procedures related to compliance with ethical requirements, professional standards, and applicable legal and regulatory provisions.

The work team was formed by professionals with expertise in reviewing non-financial information and, specifically, information on financial, social, and environmental performance.

Our responsibility

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

We have carried out our work in accordance with the requirements established in the current International Standard on Assurance Engagements (ISAE) 3000 Revised, "Assurance Engagements other than Audits or Review of Historical Financial Information" issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and following the Guidelines for Verifying Non-Financial Information issued by the Spanish Institute of Chartered Accountants.

In limited assurance work, the procedures carried out vary in nature and timing and are less extensive than those carried out in reasonable assurance work and, therefore, the assurance obtained is substantially less.

Our work has consisted of asking questions of the management, as well as various departments of Tradebe Environmental Services that participated in the preparation of the CNFIS, in the review of the information collection and validation processes presented in the CNFIS and in the application of certain analytical procedures and sample review tests described below:

- Meetings with the staff of Tradebe Environmental Services to understand the business model, policies and management approaches applied and the main risks related to these issues and to obtain the information required for the external review.
- Analysis of the scope, relevance, and integrity of the contents of the CNFIS for the 2021 financial year based on the materiality analysis carried out by Tradebe Environmental Services and described in section 1.6, bearing in mind the provisions of the commercial regulations in force.
- Analysis of the information collection and validation processes presented in the CNFIS for the 2021 financial year.
- Review of information related to the risks, policies and management approaches applied regarding the material topics presented in the CNFIS for the 2021 financial year.
- Verification through tests based on the selection of a sample of information related to the contents of the CNFIS for the 2021 financial year and adequate compilation thereof based on the information provided by the sources.
- Procurement of a letter of representation from the directors and management.

Conclusion

Based on the procedures carried out and the evidence we have obtained, no additional aspect has been revealed that would lead us to believe that the CNFS of Grupo Tradebe Medio Ambiente, S.L. and subsidiary companies for the financial year closing on 31 December 2021 was not drawn up, in all significant aspects, in accordance with the provisions of current commercial regulations and following the criteria of the GRI Standards selected in accordance with the description for each matter in the table included in Appendix II-Contents and relation to GRI standards of the CNFIS.

Use and distribution

This report was prepared in response to the requirements of current commercial legislation in Spain so it may not be suitable for other purposes and jurisdictions.

RSM SPAIN AUDITORES, S.L.P.

Mario Cepero Randos

Partner

Barcelona, 31 March 2021