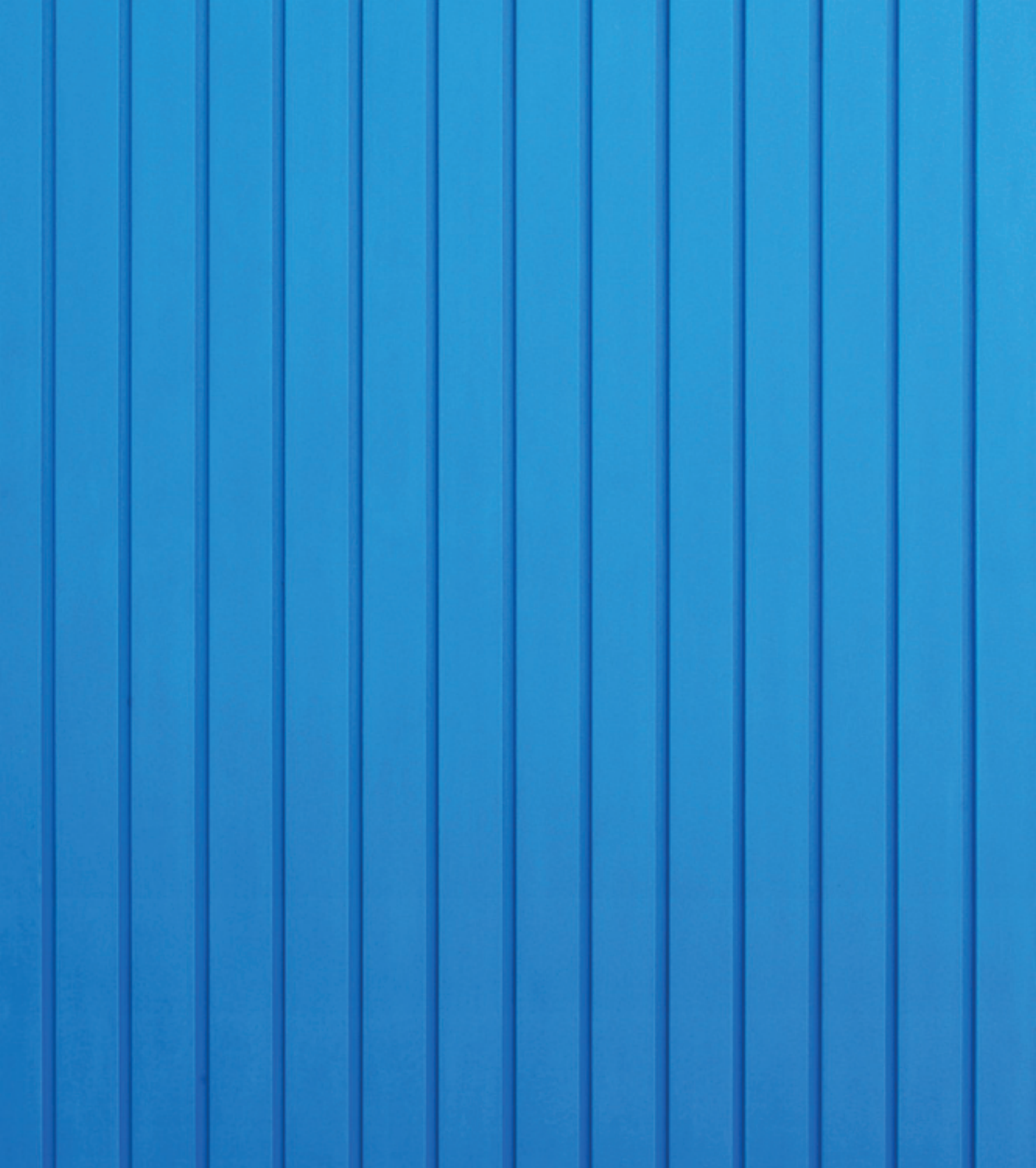


# NON-FINANCIAL INFORMATION STATEMENT

OF CORPORACIÓN FINANCIERA  
ALBA, S.A. AND SUBSIDIARIES  
FOR THE YEAR ENDED  
31 DECEMBER 2022

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# NON-FINANCIAL INFORMATION STATEMENT

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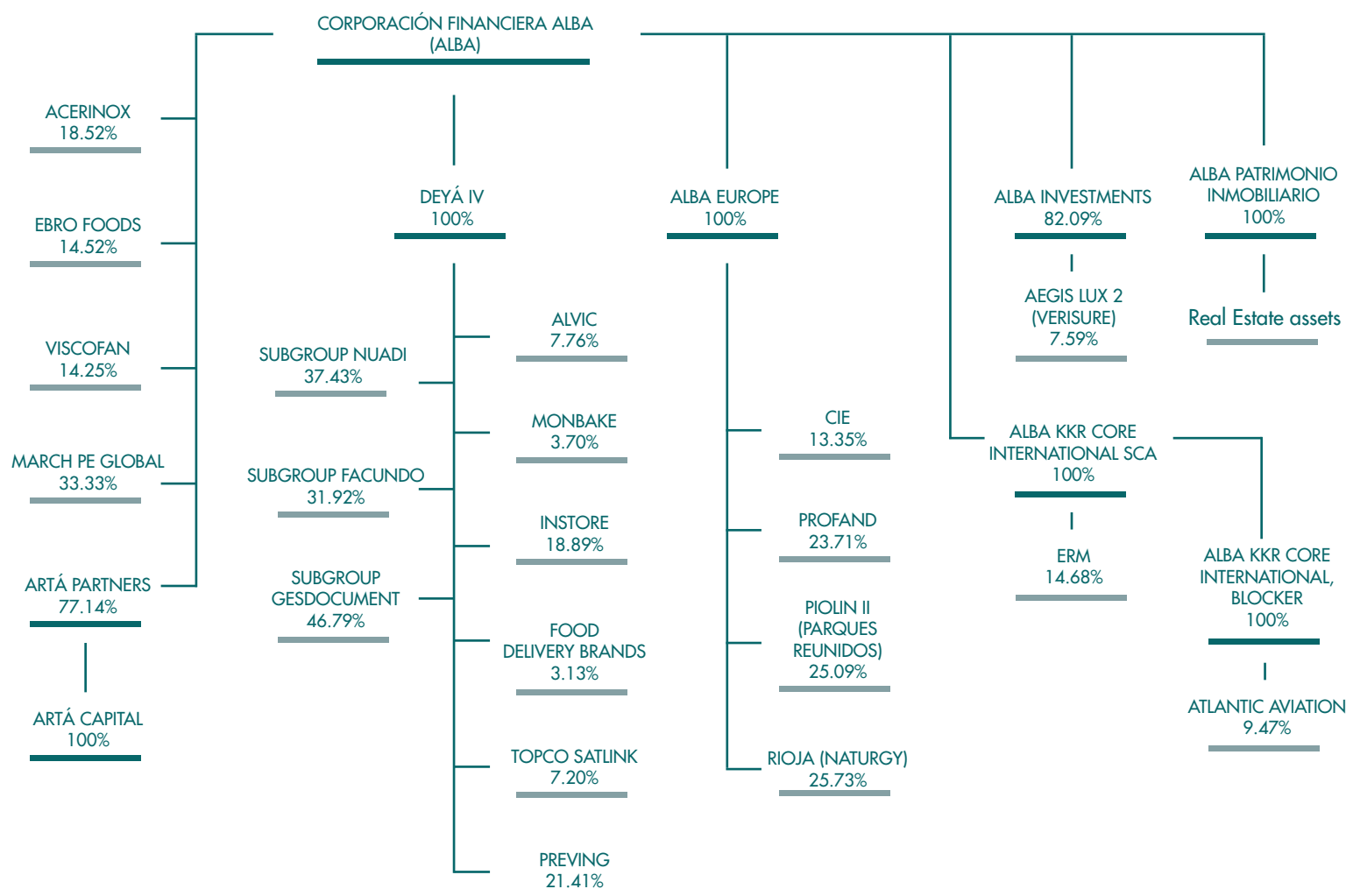
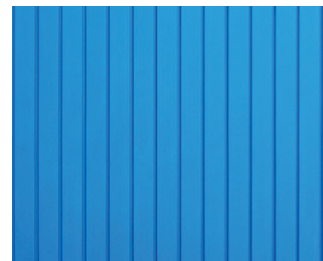
## 1. INTRODUCTION

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This Non-Financial Information Statement, which forms part of the consolidated directors' report of Corporación Financiera Alba, S.A. and its subsidiaries, is published in compliance with Spanish Non-Financial Information and Diversity Law 11/2018, of 28 December, which amended the Spanish Commercial Code, the Consolidated Spanish Limited Liability Companies Law approved by Legislative Royal Decree 1/2010, of 2 July, and Spanish Audit Law 22/2015, of 20 July, in matters concerning non-financial information and diversity.

Corporación Financiera Alba, S.A. together with its Group companies (**Alba**) is an investment company holding significant ownership interests in various listed and unlisted companies with activities in diverse economic sectors, which also owns property assets. It also holds interests in companies through private equity activities.

The following chart details the companies in which Alba had ownership interests at 31 December 2022.



**Alba:** Corporación Financiera Alba, S.A., Deyá Capital IV, SCR, S.A., Alba Europe, S.à.r.l., Alba Investments, S.à.r.l., Alba Patrimonio Inmobiliario, S.A.U., Artá Partners, S.A., Artá Capital SGEIC, S.A.U., Alba KKR Core International, SCA and Alba KKR Core International Blocker, S.à.r.l.

# NON-FINANCIAL INFORMATION STATEMENT

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The scope of this non-financial information statement includes Alba's business activities, and the activities of the Preving<sup>(1)</sup>, Satlink<sup>(1)</sup>, Nuadi, Gesdocument<sup>(2)</sup> and Facundo<sup>(2)</sup> subgroups (its subsidiaries). The quantitative information on non-financial performance relates to Alba and all of its subsidiaries, unless indicated otherwise.

This report was prepared using a selection of indicators from the internationally recognised Global Reporting Initiative (GRI) Sustainability Reporting Guidelines, following the principles and content of the most up-to-date version of the guidelines, i.e., the selected GRI Standards.

Also, the context and regulation of the industries in which the subgroups operate, the industry trends and best practices were taken into account to determine the non-financial matters that are relevant to Alba and its subsidiaries. The main relevant matters identified were, therefore, as follows:

- Compliance and business ethics.
- Occupational health and safety.
- Attraction and retention of talent.
- Company commitment to society.
- Energy efficiency and environmental management.
- Diversity and equality.
- Consumer satisfaction and safety.

This Non-Financial Information Statement describes the main non-financial areas of performance in relation to:

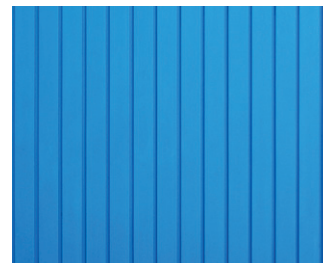
- Personnel and Human Rights matters.
- Environmental and social matters.
- Anti-corruption and bribery matters.

The report on the EU Taxonomy is also included.

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(1) Preving and Satlink ceased to be subsidiaries of Alba in the second quarter of 2022. The data on these companies included in the NFIS relate solely to the first quarter (January to March 2022).

(2) Gesdocument and Facundo became subsidiaries of Alba in the second half of 2022. The data on these companies included in the NFIS relate solely to the second half of the year (July to December 2022).



## 2. BUSINESS MODEL<sup>(3)</sup>

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**Alba** is an investment company, established in 1986 and listed on the Spanish Stock Market Interconnection System, which has significant ownership interests in various listed and unlisted companies with activities in diverse economic sectors. It also engages in the lease of properties and holds interests in companies through private equity.

Alba's objective is to create value for its shareholders and the Company as a whole in the long term by means of investments that promote the development of businesses that are sound, competitive and sustainable in the long term. For this purpose, it has an investment policy that establishes a responsible investment philosophy based on a set of principles and criteria for carrying on its business activity. This policy was approved by the Board of Directors in 2017 and amended in 2022 to incorporate the Company's strategic reflection, resulting in the inclusion of sustainability-related matters.

One of the principles is the requirement to have in-depth knowledge of the investments, both at the initial analysis stage and in the ongoing monitoring of the company in which the investment is made, its industry and the markets in which it operates. Thus, Alba establishes the most appropriate procedures

to gain an understanding of the quantitative and qualitative aspects defining the investees' activities, the latter being of special importance to Alba's long-term decision making. Whenever required, this analysis and monitoring is performed with the aid of external advisers.

As regards the geographical sphere of its operations, the need to diversify risk has led Alba to opt for both Spanish and international investments, the aim being for investments to be made preferably in conjunction with local partners and in companies that are characterised by their stability, reliability and security. Active involvement in the companies and other assets in which the company invests is another key principle of Alba's responsible investment policy and entails the holding of a representative ownership interest within the shareholder structure, as well as responsibility for, engagement with and commitment to the investees.

Alba's credibility and reputation is based on its long-term commitment and adherence to the corporate governance principles and ethical behaviour promoted by the Company. For this reason it encourages its investees to adopt advanced governance, environmental, employment, social and tax policies. Potential conflicts of interest between investees are also avoided, as are investments in potentially

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[3] GRI 2-6.



# NON-FINANCIAL INFORMATION STATEMENT

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conflictive industries from the legal or social standpoint.

The **Preving** subgroup has extensive infrastructure in Spain and carries on its business activity in the following areas: advisory services for occupational risk prevention plans; services in the field of ergonomics; occupational safety plans; industrial hygiene; health surveillance; applied psychosociology and prevention of psychosocial risks; occupational health promotion; and coordination of business activities.

In addition, the Preving subgroup has a fleet of mobile health surveillance units, which allow it to take the service to its customers. Its vehicles have all the requisite healthcare permits and are managed by its professionals in the Occupational Healthcare and Nursing area.

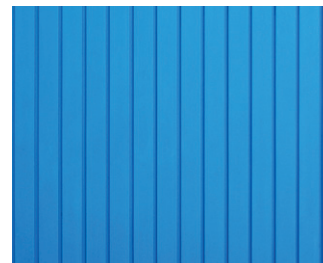
On 31 March 2022, Alba lost control over the Preving subgroup and, therefore, the related information included in this report refers only to the first quarter of 2022.

The **Nuadi** subgroup is engaged mainly in the manufacture and marketing of disc brake pad components for various applications: motorcycles, cars, road freight transport, public works and railways. Its products are aimed principally at the aftermarket, which accounts for 94% of its total production. The remaining 6% relates to the original equipment and original replacement parts market.

Since 2021, Nuadi has added Sadeca Automotive, founded in 1983, to its group. It currently has two divisions engaged in the manufacture of components for the automotive industry such as electronic brake pad wear sensors, diverse metal components for brake pads and other types of wiring for rear-view mirrors, interior lighting, fog lights, etc.

Its industrial activities are located in Sentmenat (Barcelona, Spain), where it centralises the logistics operations and its most operational services such as engineering, quality, marketing, etc., and in Tangier (Morocco), where its main factory is situated.

Its main customers are manufacturers of brake pads and manufacturers of brake systems (brake calipers). Most of its sales are made in the aftermarket industry (secondary parts market), and to a lesser extent in the original equipment (OE) industry (original parts for new vehicles).



The **Satlink** subgroup is a technology-based group and a leader in R&D solutions for sustainable fisheries and satellite communications services, with 98% of revenue generated by proprietary products. It is the world's number one producer of smart buoys for tuna fishing. It is also a leader in solutions for fisheries management and in satellite telecommunications for the maritime and defence industries.

On 31 March 2022, Alba lost control over the Satlink subgroup and, therefore, the related information included in this report refers only to the first quarter of 2022.

The **Gesdocument** subgroup engages in the provision, to individuals and legal entities, of all manner of document management and processing services in relation to the various public authorities, legal, economic, commercial, technical, administrative, employment and accounting advisory services, and recruitment services for third parties.

The business units to which Gesdocument provides its services are as follows: accounting and tax; employment; commerce; global migration services (GMS); and human capital (HC).

Gesdocument has five offices located in Barcelona, Madrid, Valencia, Zaragoza and Bilbao. It operates in the Spanish (93.9%), European (4.3%) and international (1.8%) markets. Its main objective and strategy is to lead the administrative services industry on the Iberian peninsula by means of organic and inorganic (integration of administrative service companies) transactions.

On 1 July 2022, Alba acquired control over the Gesdocument subgroup and, therefore, the related information included in this report refers only to the second half of 2022.

The **Facundo** subgroup is a business group founded in Palencia in 1944, which engages mainly in the manufacture and distribution of dried fruits and nuts and appetisers, of which it sells more than 40 million units a year. The Facundo trademark is clearly associated with quality and has a highly significant market share in north west Spain.

Its star product, marketed under the Facundo trademark, is a range of sunflower seed varieties. Its portfolio is also composed of more than 100 references for other snacks such as crisps, extruded snacks and dried fruits and nuts, in all their varieties, including most notably the "Chaskis" corn ring snacks.



# NON-FINANCIAL INFORMATION STATEMENT

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Facundo has two production plants in the province of Palencia, in Villada and Villamuriel, which distribute its products to the whole of Spain.

The company is highly committed to its contribution to employment in rural areas, where it has achieved growth and been a benchmark company for more than 75 years.

Quality is the cornerstone of Facundo's strategy, which is consistent with its trademark's image in the market. The company starts with a careful selection of raw materials and seeks out those with the best organoleptic properties from a combination of Spanish and international sources. The production process was designed to ensure the quality, freshness and safety of the foodstuffs by following the most demanding standards.

Innovation constitutes another means of development for Facundo. The company is currently focused on launching increasingly healthy products, such as the "Cuori" snacks, in line with market trends.

On 1 July 2022, Alba acquired control over the Facundo subgroup and, therefore, the related information included in this report refers only to the second half of 2022.

## 3. INFORMATION ON LABOUR AND PERSONNEL MATTERS

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### 3.1. Policies <sup>(4)</sup>

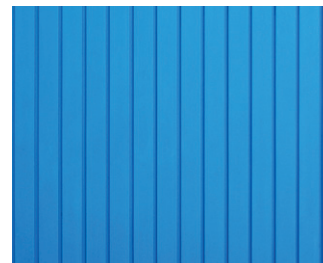
**Alba** promotes, both directly and indirectly through its investees, the values and ethics required to form trustworthy and competent teams capable of working to achieve companies' sustainability. The commitment of Alba and its subsidiaries to equal opportunities for workers ensures that selection, hiring, employment and professional development conditions are based exclusively on merit and the skills required in each case, while excluding discriminatory criteria of any kind and fostering a working environment that promotes dignity and respect.

Alba and the subgroups referred to in this report have protocols and procedures in place that enable them to implement these principles and objectives.

This commitment to people is evidenced by the creation of stable employment, the professional development of workers, and the establishment of healthy working environments in which diversity, equal opportunities and the work-life balance are respected. Alba's commitment to employment is mirrored directly by the number of employees it has, and indirectly by the total number of jobs created, both directly and

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(4) GRI 3-2 y GRI 3-3.



indirectly, at all of its subsidiaries, as well as by the promotion of good human resources practices.

The **Preving** subgroup has implemented policies to reinforce compliance with employment legislation. These policies are structured around two main pillars: occupational health and safety on the one hand, and equal rights and opportunities for all workers on the other. Their effective fulfilment is based on a series of undertakings entered into with its stakeholders.

The **Nuadi** subgroup does not have a policy on hiring, remuneration, training, etc., but does have a human resources procedure that sets forth matters relating to training, job positions, and management of employee performance and motivation.

Nuadi's first Equality Plan is currently in force for the 2022-2025 period.

Sadeca has a process in place for hiring, training and onboarding, although it is currently being updated to adapt it to the company's situation. It also has a Code of Ethics and a Quality and Environment Policy.

In addition to having a Code of Ethics covering all of its employees and other stakeholders (including suppliers, customers, institutions, etc.), the **Satlink** subgroup complies with the legislation combating discrimination of any kind in relation to hiring, remuneration, training, and health and safety.

The **Gesdocument** subgroup has internal policies and procedures in the human resources area: procedures relating to selection, hiring, onboarding, and terminations; remuneration policy, variable remuneration policy; annual leave policy and flexible remuneration plan.

The **Facundo** subgroup has a general annual leave policy that is common to all the group's companies, and the company managing the factories has the following policies: an employee work-life balance policy, a wage policy, a training policy and a general selection policy to ensure the capture and retention of talent.

# NON-FINANCIAL INFORMATION STATEMENT

## 3.2. Corporate management and performance

### 3.2.1. Employment and remuneration <sup>(5)</sup>

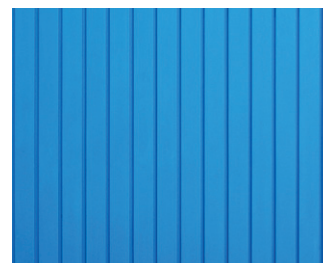
Aware of the value of human capital, **Alba** aims to maintain favourable employment policies that are in line with the needs of its employees and the Company’s specific operating requirements. Talent management and retention, and the provision of dignified employment, adequate professional development, good permanent employment contract conditions and employee benefits make it possible to keep workforce turnover rates low, year after year.

Alba and its subsidiaries had 672 employees in Spain at 2022 year-end. More than 90% of the employees have permanent contracts.

The detail of the workforce at 31 December 2022, including the employees of Alba and its subsidiaries in Spain, is as follows. Employee data are not included for Preving and Satlink as they were no longer subsidiaries at that date:

Breakdown by gender	Men	Women	Total 2022	Total 2021	Total 2020
Permanent contract	376	268	644	1,764	1,483
Temporary contract	26	2	28	190	234
<b>Total</b>	<b>402</b>	<b>270</b>	<b>672</b>	<b>1,954</b>	<b>1,717</b>
Full-Time	382	251	633	1,612	1,324
Part-Time	20	19	39	342	393
<b>Total</b>	<b>402</b>	<b>270</b>	<b>672</b>	<b>1,954</b>	<b>1,717</b>
Average remuneration (2022)	56,735	32,626			
Average remuneration (2021)	57,066	40,206			
Number of dismissals	3	18	21	35	31

(5) GRI 2-7, GRI 405-1 y GRI 405-2.



Breakdown by age	<35 years old	35-50 years old	>50 years old	Total 2022	Total 2021	Total 2020
Permanent contract	184	336	125	645	1,764	1,483
Temporary contract	9	9	9	27	190	234
<b>Total</b>	<b>193</b>	<b>345</b>	<b>134</b>	<b>672</b>	<b>1,954</b>	<b>1,717</b>
Full-Time	177	333	123	633	1,612	1,324
Part-Time	16	12	11	39	342	393
<b>Total</b>	<b>193</b>	<b>345</b>	<b>134</b>	<b>672</b>	<b>1,954</b>	<b>1,717</b>
Average remuneration (2022)	32,069	43,742	76,488			
Average remuneration (2021)	42,500	24,669	39,698			
Number of dismissals	10	11	-	21	35	31

Breakdown by professional category	Factory Workers and Clerical Staff	Middle Management	Executives	Total 2022	Total 2021	Total 2020
Permanent contract	508	100	36	644	1,764	1,483
Temporary contract	27	1	-	28	190	234
<b>Total</b>	<b>535</b>	<b>101</b>	<b>36</b>	<b>672</b>	<b>1,954</b>	<b>1,717</b>
Full-Time	498	99	36	633	1,612	1,324
Part-Time	37	2	-	39	342	393
<b>Total</b>	<b>535</b>	<b>101</b>	<b>36</b>	<b>672</b>	<b>1,954</b>	<b>1,717</b>
Average remuneration (2022)	29,229	71,974	231,035			
Average remuneration (2021)	24,636	68,677	194,704			
Number of dismissals	16	2	3	21	35	31

# NON-FINANCIAL INFORMATION STATEMENT

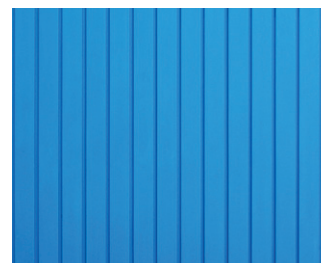
Employees with disabilities	Total 2022	Total 2021	Total 2020
Number of employees with disabilities at year-end	9	21	15

## Employees working abroad

The Nuadi subgroup has workers who perform their activities in other countries, almost all of whom have permanent full-time contracts, the detail being as follows:

Breakdown by gender	Men	Women	Total 2022	Total 2021	Total 2020
China	22	18	40	41	46
Morocco	17	96	113	129	-
<b>Total</b>	<b>39</b>	<b>114</b>	<b>153</b>	<b>170</b>	<b>46</b>
Average remuneration China (CNY)	157,933	90,299			
Average remuneration Morocco (MAD)	66,087	50,111			

Breakdown by age	<35 years old	35-50 years old	>50 years old	Total 2022	Total 2021	Total 2020
China	8	30	2	40	41	46
Morocco	90	23	-	113	129	-
<b>Total</b>	<b>98</b>	<b>53</b>	<b>2</b>	<b>153</b>	<b>170</b>	<b>46</b>
Average remuneration China (CNY)	87,654	146,597	59,329			
Average remuneration Morocco (MAD)	48,554	74,881	-			



Breakdown by professional category	Factory Workers and Clerical Staff	Middle Management	Executives	Total 2022	Total 2021	Total 2020
China	29	10	1	40	41	46
Morocco	97	12	4	113	129	-
<b>Total</b>	<b>126</b>	<b>22</b>	<b>5</b>	<b>153</b>	<b>170</b>	<b>46</b>
Average remuneration China (CNY)	88,742	209,233	Not available on the grounds of confidentiality			
Average remuneration Morocco (MAD)	41,747	73,956	249,332	21	35	31

The data on employees working abroad reported in the foregoing tables are broken down by country, as required by law, and include only the remuneration data for 2022, since the disaggregated information for 2021 is not available.

Both **Alba** and its subsidiaries are committed to maintaining a remuneration model for their employees that guarantees the principle of equal pay for work of equal value is effectively applied, and that there are no salary differences due to gender or on any other discriminatory grounds. The remuneration is distributed on the basis of salary brackets according to the employee's level of responsibility, the type of work, alignment with market remuneration for positions with the same conditions, and taking into account the company's sustainability in this regard.

The pay gap is measured as the difference between the average remuneration received by men and the average remuneration received by women. Alba carried out this exercise by including the data on its subsidiaries in Spain and excluding the average salaries of employees working abroad as they are not comparable with the data for employees working in Spain due to the different salary brackets used in each country and the different currencies in which they are paid, the translation of which to euros would greatly distort the data.

As mentioned above, there were changes in the scope of consolidation in 2022 and, therefore, the gross pay gap figure for 2022 (42%) is not strictly comparable with the figure reported in 2021 (29.5%).

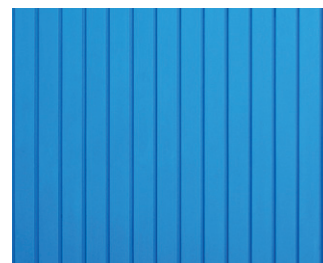
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It should also be noted that this aggregate pay gap figure does not adequately represent the situation in this area since the remuneration of each professional category is very different at each company, and there are very few women in certain professional categories.

The breakdown of men and women in the various professional categories at Alba and its Spanish subsidiaries is as follows.

	Factory Workers and Clerical Staff	Middle Management	Executives
Number of male employees 2022	314	60	28
Number of women employees 2022	222	41	7
Number of male employees 2021	841	80	35
Number of women employees 2021	975	17	6





In order to provide a more representative figure, the pay gap figures are detailed below for each professional category at each of the companies included in this report:

Pay gap	Factory Workers and Clerical Staff	Middle Management	Executives
2022 Alba	(16%)	55%	n.a.
2022 Nuadi	18%	n.a.	22%
2022 Gesdocument	8%	8%	3%
2022 Facundo	9%	36%	n.a.
2021 Alba	14%	18%	n.a.
2021 Nuadi	15%	(16%)	25%
2021 Preving	9%	3%	26%
2021 Satlink	8%	(24%)	n.a.

As mentioned above, the remuneration models applied do not include any criteria that discriminate on the basis of gender. However, work is underway to correct these differences through the effective application of the principle of equality.

Although efforts are made to analyse and monitor the salary figures in order to ensure equal opportunity principles are always applied, changes in the scope of consolidation of Alba and its subsidiaries, and in the nature of the business activities of each subgroup, make it difficult for the data to be comparable and aggregated.

# NON-FINANCIAL INFORMATION STATEMENT

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## 3.2.2. Organisation of the work<sup>(6)</sup>

**Alba's** Code of Ethics and Conduct addresses respect for the personal and family life of its professionals and implements measures aimed at facilitating flexibility and reconciliation to promote the necessary work-life balance of its employees, as well as the possibility of remote working.

In 2022, Alba did not have to adopt any measures in relation to furlough-type arrangements.

Also, in order to promote digital disconnection, at Alba work meetings are not convened outside working hours.

At the **Preving** subgroup, work-life balance measures are promoted to foster the necessary balance between the personal and professional lives of its employees, with specific measures such as 30 to 60 minutes of timetable flexibility for employee arrivals and departures, public holidays and paid leave days, and work-life balance days on Fridays, in holiday or summer periods and on the eve of public holidays. As a result of the implementation of measures of this kind, the companies of the Preving subgroup received

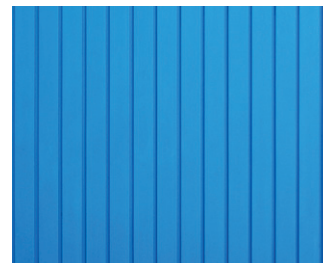
awards from regional governments and city councils alike. A remote working mechanism has been implemented for those job positions in which it is possible to work remotely, which allows 20% of annual working hours to be completed remotely.

In 2021 the **Nuadi** subgroup established shift flexibility measures to facilitate the work-life balance, which remained in force in 2022. A remote working protocol was also established for those employees whose functions allowed it. Sadeca also has various shifts, which helps improve organisation, efficiency and the work-life balance. Also, the intensive summer timetable in August, rotating shifts for factory and warehouse teams and a sports group were established in 2022.

The organisation of working hours at the **Satlink** subgroup is determined on the basis of the applicable collective agreement and, in addition, promotes flexibility in terms of work start and finish times. Measures are also promoted to foster disconnection from work and to enable employees to balance their personal lives with their professional development at the company. As a result of the pandemic, remote working was implemented in 2021 for employees whose functions allowed it, and it was continued in 2022.

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(6) GRI 3-3 y GRI 403-9.



As regards work organisation, the **Gesdocument** subgroup has a flexible timetable in terms of work start and finish times. It has also implemented a “flexiwork” policy, which allows employees to work remotely one day a week and two Fridays a month, at the discretion of the employee, to facilitate the work-life balance.

The Gesdocument annual leave policy establishes 25 working days’ annual leave a year, three days more than in the collective agreement.

At the **Facundo** subgroup, the office staff of the group’s companies benefit from one hour of flexibility for arriving at and leaving the office. From Monday to Thursday the office employees’ working day is split by a lunch break, and on Friday they work a condensed working day in the morning with no lunch break.

Factory staff have the same working hours from Monday to Thursday (working day with a lunch break), and on Friday they have a continuous eight-hour working day, with a fifteen minute break, to facilitate their work-life balance.

Sales representatives, and other commercial and delivery staff organise their timetables in accordance with visits, customers and routes.

Warehouse and delivery staff that work on Saturday can then take a Monday off.

An Equality Plan has been agreed upon with factory staff to incentivise the use of new information technologies (conference calls, video calls, etc.) as a means of facilitating the work-life balance, by reducing, whenever possible, trips and commutes, and by holding internal meetings and training courses during working hours whenever possible.

Other organisational measures implemented are as follows: there is the option to take all holiday periods together to care for a relative of first degree of kinship on sickness leave of at least six months, subject to prior agreement between the parties; a paid reduction of one hour per working day may be requested for a period of one month to care for a child under 12 years of age due to a very serious illness or accident, provided that either case involves hospitalisation; a policy allows employees to relocate to a workplace closer to their homes to care for children under 12 years of age or dependent family members (disability >65%), who are not in paid employment, whenever possible; an extra month on top of the period during which a job position must be reserved when a leave of absence to care for a child is requested, up to a total of 13 months; unpaid leave of one month for people in the process of

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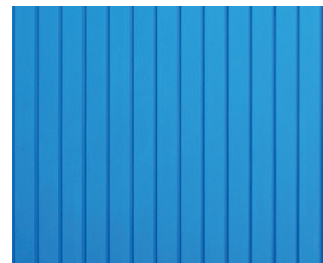
adopting or fostering children, where duly evidenced; unpaid leave of up to five days in a calendar year for employees undergoing assisted reproduction treatment, where duly evidenced.

The detail of absenteeism at Alba and its subsidiaries is as follows:

	Total 2022	Total 2021	Total 2020
Number of hours of absenteeism recorded in the year for all employees <sup>(*)</sup>	36,884	44,740	213,068

(\*) Hours of absenteeism: total hours absent from workplace due to ordinary or professional contingencies.

Following the sharp fall in 2021 with respect to 2020 caused by the end of the Covid-19 pandemic, the downward trend in absenteeism continued in 2022 with respect to the previous year, albeit at a slower rate. However, the consolidated information for 2022 has a different scope to the information reported in previous years as a result of the changes in the scope of consolidation in 2022 and, therefore, this type of information cannot be monitored or compared on a strict like-for-like basis.



### 3.2.3. Health and safety<sup>(7)</sup>

**Alba** sets out its specific health and safety commitments in its Code of Ethics and Conduct and in the procedures and manuals established for this purpose.

Alba and the subgroups have measures in place to monitor and promote health and safety at the workplace, and conduct training activities for employees in this area, as well as health monitoring programmes and external audits to check that the established health and safety procedures, among others, are applied correctly.

The **Preving** subgroup demonstrates its commitment to promoting the health and safety of its employees through training and information activities on healthy lifestyles in and outside working hours, and it promotes the wellbeing of its employees by fostering safe environments and healthy workplaces. This commitment is evidenced by the certification of the Health and Safety Management System implemented in accordance with the OHSAS 18001:2007 standard issued by an external company.

The **Nuadi** subgroup has an Occupational Risk Prevention Management System the goal of which is to comply with its Health and Safety Policy through the integration of preventive activities into all aspects of management and at every hierarchical level, and it has an Occupational Risk Prevention Plan approved by management and adopted by the whole organisational structure, especially on all hierarchical levels, with which all the employees are familiar. Risk assessment and planning of preventive activities are essential tools for the management and application of this Plan.

Employee health is monitored on a regular basis, in accordance with the risks inherent to the work, by healthcare personnel with accredited technical skills, training and capacity.

Sadeca uses an External Prevention Service for the occupational risk prevention area.

The **Gesdocument** subgroup entered into an external prevention service agreement with the Preving group.

The **Facundo** subgroup has an external prevention service, Ibersys, for all of the group's companies.

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<sup>(7)</sup> GRI 3-3, GRI 403-9 y GRI 403-10.

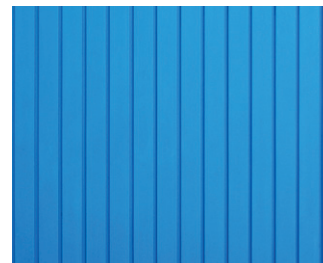
# NON-FINANCIAL INFORMATION STATEMENT

In 2022, the assessments were updated and a portion of the group’s workforce was provided with training.

The following chart shows the 2020, 2021 and 2022 health and safety indicators broken down by gender for the employees of Alba and its subsidiaries in Spain:

Health and safety indicators	2022		2021		2020	
	Men	Women	Men	Women	Men	Women
Frequency rate <sup>(*)</sup>	31.45	2.03	19.52	15.96	11.25	16.54
Severity rate <sup>(**)</sup>	0.32	0.09	0.12	0.21	3.86	10.62
Work-related ill health	8	82	3	7	-	-
Number of fatalities	-	-	-	-	1	-

(\*) Frequency rate: number of work-related injuries with days away from work x 1,000,000 / total number of hours actually worked.  
 (\*\*\*) Severity rate: number of days not worked due to work-related injury with days away from work x 1,000 / total number of hours actually worked.



### 3.2.4. Labour relations <sup>(8)</sup>

At Alba and its subsidiaries, the aim is to manage labour relations with employees effectively and in detail, so as to ensure that the employment rights of all employees are observed. In addition, social dialogue is based on the various collective agreements in force, which guarantees respect for, and adherence to, the principles set forth in each of them.

The applicable collective agreements are as follows:

- For **Alba**, the Madrid Autonomous Community Collective Agreement for Offices.
- For the **Preving** subgroup, the Collective Agreement for Prevention Service Companies.
- For the **Nuadi** subgroup, the Navarre Collective Agreement for the Iron and Steel Industry.
- For the **Satlink** subgroup, the Collective Agreements for the Metal Trade in the Madrid Autonomous Community and Pontevedra, and the National Collective Agreement for Engineering Companies and Technical Survey Offices.

- For the **Gesdocument** subgroup, the Collective Agreements for Offices in Catalonia, Bilbao, the Madrid Autonomous Community, the Valencia Autonomous Community and Zaragoza.
- For the **Facundo** subgroup, the Collective Agreement for the Foodstuffs Trade in Valladolid, the Collective Agreement for Offices in Palencia, the General Trade Collective Agreement in Palencia, the Collective Agreement for the Foodstuffs Trade and a Company Agreement at one of the group's companies.

100% of the employees of Alba and its subsidiaries in Spain are covered by collective agreements.

In companies where they are applicable, there are Works Councils and/or trade union representatives who oversee compliance with the principles established in the applicable collective agreements and ensure fluid lines of communication between all the workers and relevant company bodies.

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(8) GRI 3-3 y GRI 2-30.



# NON-FINANCIAL INFORMATION STATEMENT

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## 3.2.5. Training <sup>(9)</sup>

**Alba's** training procedures are adapted to employees' needs and take into account the characteristics of the functions they perform, their careers and professional development, so that resources are focused on the requirements of each position and the current market. In 2022 employees were able to access the training they required remotely and in person.

The **Preving** subgroup has included an Integration Training Plan, which is a planned process whereby the company provides its new hires with everything they require to develop their capacities and skills, as well as the appropriate attitudes and aptitudes to perform their functions at the company. The Group has a continuous training procedure, which defines the responsibilities of area managers as follows: ensure that the employees under them receive adequate training and have the appropriate skills; detect employees' training requirements and prepare the annual continuous training plan proposal, which must be approved by the General Manager of People.

The **Satlink** subgroup has an Occupational Risk Prevention training policy for work performed onboard ships, and a technical training policy for developers and technical staff. It also has specialised programmes in proprietary technologies for customers to improve efficiency in the use of the solutions and products offered. Also, Satlink's Code of Ethics stresses its commitment to each employee's training, using all the resources the group places at the employees' disposal, as part of its ongoing commitment to employees and the company, in order to update and increase their training so that they can achieve full professional development and reach their personal goals.

The **Gesdocument** subgroup has various training policies for its employees: internal training provided by its specialists; external training for all workers requiring it for their position, to assist in professional development or to develop skills; language policy: the company finances 50% of the English language training for employees, and the other 50% may be included in flexible remuneration, and for employees requiring the language to perform their functions, 75% of the cost is covered.

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(9) GRI 3-3 y GRI 404-1.

The **Facundo** subgroup has a training policy for one of its companies. At the other group companies, when a worker or company detects a training need, an assessment is made of whether it is appropriate. Spanish Government Foundation for Employment Training (FUNDAE) training credits are used.

The detail of the hours of training of the employees of Alba and its subsidiaries is as follows:

Detail, by professional category, of total number of hours' training provided	Factory Workers and Clerical Staff	Middle Management	Executives	Total
Hours of training 2022 <sup>(*)</sup>	2,533	1,754	444	4,731
Hours of training 2021	1,664	607	364	2,635
Hours of training 2020	40,791	484	300	41,574

(\*) Note: information is not included on the hours of training of the Satlink and Preving subgroups as the information for these companies for the first quarter of 2022 is not available. The information reflected is not comparable with prior years because of the changes in the reporting scope.

# NON-FINANCIAL INFORMATION STATEMENT

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## 3.2.6. Accessibility and equality<sup>(10)</sup>

**Alba** 's Code of Ethics and Conduct includes the principles of non-discrimination and equal opportunities with which it aims to fulfil its commitment to create a working environment in which all employees enjoy fair treatment, respect and dignity, and any forms of violence or harassment, abuse of authority or any other conduct that violates people's and workers' rights are rejected. Also, when holding general meetings, Alba facilitates the accessibility of people with disabilities and the elderly, in order to guarantee their right to access prior information and the assistance they require to attend the meeting and cast their vote. The hall in which the meetings are held is universally accessible for people with special needs.

All the buildings owned by Alba have measures in place to enable the universal access of people with disabilities and, therefore, comply with all the applicable legislation. In addition, and despite not being compulsory, accessible toilets have been installed on all their floors.

At the **Preving** subgroup, the additional regulatory compliance measures relating to accessibility and equality include most notably the regular analysis of the equality rates of the

various departments composing the group. As a result of this analysis, specific decision-making criteria have been added to the candidate selection criteria according to the position and department involved, with the aim of reducing the gender disparity in some sections of the company and encouraging positions traditionally filled by persons of one gender to be accessed by persons of the other gender. Also worthy of note is the implementation of the Equality Plan, which has led to greater equality in the overall distribution of the workforce, resulting in an improvement to the percentages in most departments. All trace of sexist language has been eliminated and the candidate selection process has been recalibrated to ensure more women are hired in fields traditionally associated with men.

The **Nuadi** subgroup has entered into a cooperation agreement with Areté Activa for the 2023-2025 period for the execution and rollout of actions relating to the measures agreed upon in Nuadi's first Equality Plan signed in 2021.

The **Satlink** subgroup has also implemented equality measures in line with the principles of non-discrimination and equal opportunities enshrined in its Code of Ethics. The subgroup demonstrates its commitment to equality by creating a fair, respectful and dignified working

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(10) GRI 3-3.

environment, paying particular attention to promoting equal opportunities and treating all employees fairly and without prejudice, while eliminating any kind of discrimination, whatever its grounds or origin.

The **Gesdocument** subgroup has an Equality Plan on the basis of which compulsory gender equality training has been provided to all of its employees: “Promoting equality at Gesdocument”. This training course was included in the initial training plan for new hires as part of their training pathway, which they must complete, together with a final test on their third day at the company. In addition, there is a harassment prevention code and an internal and confidential ethics channel available to all the employees to make complaints. Also, the building housing its offices complies with all the measures required to facilitate access for people with disabilities. The offices are also equipped with adapted doors and toilets for people with disabilities.

The **Facundo** subgroup has an equality plan which describes the measures to be implemented and carried out.

## 4. INFORMATION ON ENVIRONMENTAL MATTERS

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### 4.1. Policies <sup>(11)</sup>

**Alba** has various policies and internal regulations, the Sustainability and Investment Policies and the Code of Ethics and Conduct, approved by the Board of Directors, which set out the Group’s principles of conduct in environmental matters. Thus, Alba’s Code of Ethics and Conduct declares its respect for the environment, in terms of both the conduct resulting from its direct activities and the environmentally responsible behaviour of the companies in which it invests. The Sustainability Policy evidences Alba’s firm commitment to conserve the environment and reduce the negative impact of its activities, and places emphasis on the fight against climate change. On the basis of the commitments defined, Alba’s response focuses on preventing contamination, and on the responsible and sustainable use of resources, together with proper waste management. Furthermore, since 2017 Alba’s Investment Policy has included criteria to assess responsible investment, so that it invests in companies with environmental best practices.

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(11) GRI 3-2 y GRI 3-3.

# NON-FINANCIAL INFORMATION STATEMENT

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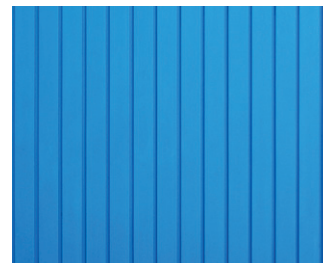
The **Preving** subgroup has a specific ISO 14001-certified environmental management system in place. The framework of this system provides a procedure for the identification and assessment of environmental issues associated with the group's activities, products and services that may affect its environmental behaviour from a life cycle perspective. Responsibility for the Integrated Management System has been assigned to a person who is in charge of identifying and assessing the company's environmental matters and impacts in this regard.

For its part, the **Nuadi** subgroup has an ISO 50001-certified environmental management system in place, which includes an Environmental Policy that fully respects the environment in which it carries on its activity, and an Environmental Management Department which involves the whole organisation in these matters.

Although Nuadi has never suffered any environmental incidents, it also takes out third-party liability insurance providing coverage for any type of incident of this nature.

At Sadeca, its environmental goals form part of the company's general goals, and drills are carried out and environmental incidents are monitored as KPIs.

The **Satlink** subgroup acknowledges its role in the challenge posed by climate change and, for this reason, it has implemented a Quality and Environment Policy focused on ensuring compliance with a series of measures to protect biodiversity, reduce consumption of water, energy and other resources, prevent waste generation and combat climate change. Satlink's policy enshrines its resolve to continue improving its environmental behaviour, not only in terms of the ways in which it works, but also with regard to its internal management processes, the training provided to employees of the companies in the Satlink group and the group's image. Management is committed to communicating, explaining and upholding, with all the means at its disposal, the content of the policy with respect to employees, customers and suppliers, as well as Spanish or international public and private institutions. To put this policy into practice it implements a quality system, in compliance with the UNE-EN-ISO 9001 and UNE- AS 9120B standards, and ISO 14001 certification, with the aim of maintaining best practices designed to prevent and reduce pollution and minimise the most significant environmental issues, as well as possible emissions, discharges and hazardous waste, in order not to cause damage, or minimise the damage, to the environment as a result of its activities. Also, members of staff are assigned to environmental management tasks, who have received training in this connection



and are responsible for the management of industrial waste collection agreements and services.

The **Gesdocument** subgroup does not have a specific department in charge of environmental risk prevention since its activities have almost no impact on the environment; however, environmental criteria are becoming increasingly important to its activities. As a result, there is an increasing awareness of available resources usage, and to that end, eliminating the use of paper, using cleaner sources of energy, as well as progressively reducing the carbon footprint and eliminating any unnecessary travel are being encouraged. In addition, remote working has had an enormous impact on paper consumption and digitalisation.

Gesdocument has also drastically reduced the use of air travel as its most common means of transport, in favour of rail travel.

The **Facundo** subgroup has a standing commitment to improve the energy performance of its facilities and equipment, and takes into account any opportunities for improving the design and acquisition of energy-efficient products and services. In recent years, as part of Facundo's ongoing improvements, conventional lighting has been replaced with LEDs, the installation of stepper motors

and variable speed drive starters has been promoted and improvements have been made in the thermal insulation of production buildings.

## 4.2. Environmental management and performance

### 4.2.1. Energy and climate change<sup>(12)</sup>

One of Corporación Financiera Alba's commitments, as stated in its Sustainability Policy, is linked to climate change mitigation and minimising the impact which its activities might have on the climate. Thus, given the nature of the activities carried on by Alba and its subsidiaries, the impact of those activities is monitored by means of energy consumption and emissions generation indicators. Also, the sustainability indicators required pursuant to Regulation 2020/852 regarding the EU Taxonomy for sustainable investment were calculated for this Non-Financial Information Statement. These express the percentage of turnover, capital expenditure (CapEx) or operating expenditure (OpEx) represented by taxonomy-eligible and taxonomy-aligned activities at Alba and its subsidiaries. The indicators will help Alba and its subsidiaries

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(12) GRI 3-3, GRI 302-1, GRI 302-2, GRI 302-4 y GRI 305-1.

# NON-FINANCIAL INFORMATION STATEMENT

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to ascertain, and ensure optimal management of, the impacts their activities have on climate change and the environment, thereby encouraging reflection with regard to more sustainable and environmentally friendly business models.

Alba and its subsidiaries will continue to identify, assess and manage the risks and opportunities arising from climate change, and measure the financial impacts they may have on its activities, commercial relationships, and products and services.

At **Alba** energy consumption basically relates to the use of the lighting and heating systems and computer hardware in the offices and buildings it owns (Castellana 42, Castellana 44, Castellana 89 and Oasis buildings). To reduce this consumption various energy efficiency measures have been implemented, such as replacing traditional incandescent light bulbs with LEDs, carrying out refurbishment work on buildings to increase energy efficiency or conducting external energy efficiency controls and audits which help Alba reduce its impact on the environment.

The Castellana 89 building has had LEED Gold certification, awarded by the US Green Building Council (USGB), since 2021. In 2022 work started on the process of removing gas boilers and replacing chillers with heat

pumps to continue to improve energy efficiency and reduce the carbon footprint.

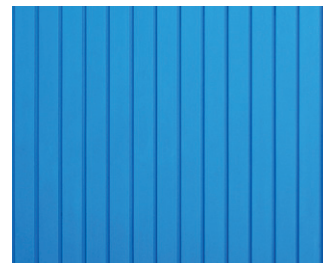
Since January 2021 a solar PV plant has been in operation at the Oasis building, which provides a portion of the energy required for the building's facilities and services with the concomitant reduction in energy consumption. Production in 2022 exceeded 120,000 KWh, which represents a saving in terms of the equivalent amount of CO<sub>2</sub> of 28,768.5 Kg CO<sub>2</sub>eq. (emission factor according to the Spanish National Markets and Competition Commission (CNMC)).

In 2022 an ESG study was carried out on the Castellana 42 building which defined the improvement actions required to obtain environmental certifications. These actions started to be implemented at the end of 2022 and will be completed in the first half of 2023. The building has an agreement that ensures that 100% of the energy supplied is from renewable sources.

The façades of the Castellana 89 and Castellana 42 buildings have vinyl-based sunlight filtering systems which make it possible to reduce solar heat gain, thus reducing HVAC energy consumption.

In 2022 an integral refurbishment project was commissioned for the Castellana 44 building to





increase its energy efficiency and sustainability, and to achieve higher standards of comfort and maintenance.

At Alba, the emissions generated also arise from use of vehicles in the company's own fleet. With a view to reducing the emissions generated and the carbon footprint, Alba replaces its petrol or diesel-run vehicles with electric or hybrid models. The building in which Alba's offices are located has electric vehicle charging points.

Furthermore, since 2021, the Oasis and Castellana 89 buildings have been equipped with electric vehicle charging points for use by the buildings' occupants, after hiring the service from the electricity provider.

The Castellana 42 and Oasis buildings have been installed with parking areas for bicycles, as a measure to foster the use of this mode of transport as an alternative to less environmentally-friendly means.

The **Preving** subgroup treats electricity as a natural resource for carrying on in its activities in its facilities, and accordingly, to optimise its use the subgroup encourages its employees to adopt specific measures to avoid unnecessary power consumption, and conducts energy audits at its centres in Andalusia, Extremadura and Madrid with the aim of achieving greater

energy efficiency. As regards transport, with the goal of reducing the fuel consumption of its vehicles, the subgroup studies the routes used to visit customers in order to maximise efficiency, thereby reducing the number of journeys made in company vehicles.

With respect to the **Nuadi** subgroup, the only atmospheric CO<sub>2</sub> emissions are those produced by the two heating boilers with a combined consumption of 1,948.9 KW. Due to the low level of emissions, control of atmospheric emissions is not deemed necessary. As measures to reduce energy consumption, the subgroup follows a rigorous plan involving legal reviews, boiler and chiller energy inspections and complete energy audits. In line with the target to reduce the electricity consumed in lighting, in 2022 the progressive change to LED systems throughout the entire plant was completed.

At Sadeca its industrial activities only consume electricity which, according to its certification, is largely supplied from renewable sources. A KPI is used to monitor electricity consumption on a monthly basis and a target has been set to reduce the electricity consumed in lighting by means of a progressive change to LED systems.

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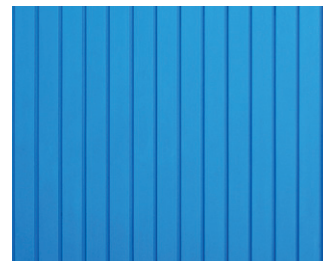
The **Satlink** subgroup’s offices have a zone-by-zone heating and air conditioning system with energy efficient equipment. The company is fully aware that the pressure on the world’s natural resources and the challenge posed by climate change require a rapid response from all concerned, and its energy- and emission-related impacts are controlled by personnel with environmental responsibilities at each facility. Noteworthy in this connection are the actions of the companies in the subgroup to reduce the emissions of their products throughout their entire life cycle, such as sonar-equipped smart buoys for tuna fishing, whose software, developed by Satlink, optimises fleet movements through the detection of optimal shoals of fish, thereby resulting in fuel savings and reductions in CO<sub>2</sub> emissions.

In its efforts to help the environment and optimise the use of the available resources, the **Gesdocument** subgroup uses LED systems to optimise electricity, fosters the elimination of paper, obtains electricity from providers using more environmentally friendly sources and contributes to progressively reducing its carbon footprint by dispensing with any unnecessary travel.

The following tables show the energy consumption and greenhouse gas emission data of Alba and its subsidiaries for the last three years:

Energy consumption <sup>(*)</sup> (amounts in thousands)	Total 2022	Total 2021	Total 2020
Electricity consumption (MWh)	8,320	7,793	6,634
Natural gas consumption (MWh)	4,101	4,710	3,820
Diesel consumption (litres)	266,077	647,475	355,590

(\*) Note: the data for diesel consumption in 2021 has been reviewed having detected that it included the consumptions of buildings owned by Alba that are not specifically attributable to Alba’s activities but to those of third parties.



Greenhouse gas emissions (tCO <sub>2</sub> eq) <sup>(*)</sup>	Total 2022	Total 2021	Total 2020
Scope			
Scope 1	1,566	2,742	1,830
Scope 2	2,163	1,948	1,261
Total	3,730	4,690	3,090

(\*) Note: the data relating to emissions arising from diesel consumption in 2021 has been reviewed having detected that it included the consumptions of buildings owned by Alba that are not specifically attributable to Alba's activities but to those of third parties.

Alba's electricity consumption relates mainly to the use of its buildings. A 42% increase in energy consumption was observed in 2022 in comparison with 2021, as a result of the full recovery of the company's activities to slightly above pre-pandemic levels (3.6 thousand MWh in 2019 as compared to 4 thousand MWh in 2022). Diesel consumption fell sharply following the exclusion of the Preving subgroup, which accounted for 63% of total diesel consumption in 2021.

These changes were also reflected in the emission data, with a decline in the scope 1 emissions arising from fuel consumption and a rise in the scope 2 emissions, which were also affected by a gradual increase in the emission factor associated with electricity consumption, which has been rising since 2020.

However, as indicated in other sections, the change in the scope of consolidation in 2022 does not permit comparison and close monitoring of the data for 2022 with respect to prior years.

#### 4.2.2. Sustainable use of resources and circular economy<sup>(13)</sup>

Alba has adopted a series of measures which, as stated above, aim to improve efficiency, and the sustainable and responsible use of resources. Given that paper is the main material used in the performance of its activities, in order to minimise its consumption, all of Alba's departments have a digital archive enabling files to be consulted, downloaded and shared. Moreover, all the paper used is Forest Stewardship Council (FSC) certified.

(13) GRI 3-3 y GRI 301-1 y GRI 303-3.

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Paper consumption in 2022 reflected similar values to those in 2021.

The main materials used in the **Preving** subgroup relate to the healthcare consumables used to perform medical check-ups, which are subject to the corresponding waste management procedure. In addition, one of the resources used the most in the subgroup's offices is paper; therefore rationalising its use and reducing its consumption are two of the main objectives to be achieved. To this end, Preving carries out internal campaigns to encourage responsible and sustainable use of paper in its offices.

The main incoming raw material used in the **Nuadi** subgroup's manufacturing process are steel coils of varying sizes and the scrap metal resulting from the manufacturing process is sent to a metal waste manager.

With regard to water, this is included in future phases of Nuadi's Waste Reduction Plan.

With respect to Sadeca, water consumption at this entity relates solely to water for human consumption and domestic purposes, as it is not used in the industrial process.

The company uses recycled raw materials, such as polyamide or PVC injection regrind, selling injection moulding waste in both materials as

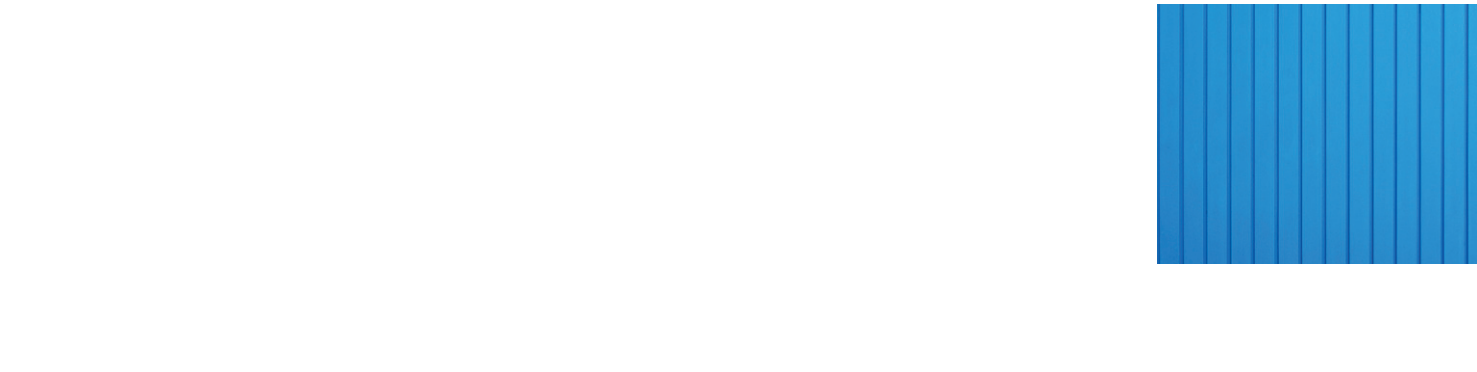
a by-product for production using recycled material.

Waste that is recycled and valorised includes paper and cardboard, film, timber used for pallets, remains of stainless steel parts, cable and non-hazardous waste.

The **Satlink** subgroup is endeavouring to minimise the impact that its product designs and the facilities used in its manufacturing processes might have. Noteworthy in this connection is the design of the solar buoy, which does not require battery replacement during its useful life, thereby avoiding the use of lead batteries in its manufacture; and, in addition, the advances achieved in reducing the amount of materials used in buoy production.

For the **Gesdocument** subgroup, water consumption at its various branches is scanty material and paid by the buildings' lessors.

In its manufacturing processes, the **Facundo** subgroup, always seeks to optimise the natural resources it uses based on the premise of absolute respect for the environment in the performance of all its activities.



To this end, Gesdocument is committed to carrying on its activity sustainably, using the most advanced techniques available and taking the necessary measures to reduce its impact on the environment.

The fundamental principles of its environmental policy include most notably: (i) ensuring compliance with the environmental legislation and regulations applicable to its facilities and operations; (ii) applying the measures required to prevent pollution, minimise waste generation and make responsible use of material and energy resources; and (iii) fostering environmental training and awareness-raising among all its employees. To achieve this special attention is given to improving manufacturing equipment to ensure that there are no breakdowns or leaks resulting in a loss of raw materials and to improving the water supply networks, so that there are no uncontrolled leaks.

The detail of the materials consumed by Alba and its subsidiaries is as follows:

The decrease in office paper consumption was due to the exclusion of the Preving subgroup after the first quarter of 2022, since its contribution to this indicator in 2021 accounted for 93% of total consumption.

The increase in water consumption was caused by the inclusion of the Facundo subgroup. Also, as indicated above, the change in the scope of consolidation in 2022 does not permit comparison and close monitoring of the data for 2022 with respect to prior years.

Given the diversity of Alba’s subsidiaries, material consumption is also diverse although it does not affect all the companies, as is the case with the paper and water consumption indicators. These other materials consumed include notably the cardboard packaging used by the Facundo subgroup (1,500 tonnes of cardboard in the second half of 2022), and the steel consumed by Nuadi (2022: 30,434 tonnes of steel).

Consumption of materials	Total 2022	Total 2021	Total 2020
Water for human consumption (m <sup>3</sup> )	39,883	34,990	31,064
Paper consumption (kg)	6,694	20,510	21,378

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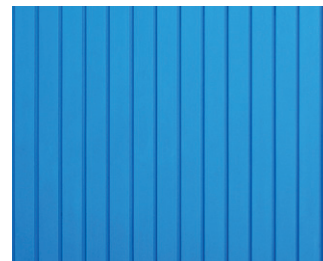
**Alba** continues to implement specific measures to reduce waste generation and ensure proper waste treatment and management. Alba's offices have water fountains, and each employee is provided with a glass bottle to avoid the use of disposable cups. Improvements continue in the management of waste such as coffee capsules, batteries and other office waste, as well in the recycling of pollutant waste such as printer toner cartridges.

The offices used by Alba have been fitted with timed flow taps, dual flush toilets and individual meters for water consumption, thereby enhancing water usage.

The types of waste generated by the **Preving** subgroup as a consequence of its activities are mainly special bio-sanitary, cytostatic and chemical in nature. To ensure proper collection, transportation, storage and management of this waste, collection services are outsourced to certified external waste management providers who operate in accordance with the prevailing legislation.

Roll out of the Waste Reduction Plan in place at the **Nuadi** subgroup commenced in 2020. The subgroup's main source of waste is the scrap metal resulting from the manufacturing process. The small size of the surplus trimmings make them adequate for use in automatic dosers at steel foundries and works, to control the composition of the melt. The waste manager sends most of the surplus metal produced to a foundry located 40 km away, where it is converted into motor blocks and cylinder heads to be recycled in automotive industry manufacturing processes.

The **Satlink** subgroup reuses the components rejected during the production process by repairing them. Any components that cannot be recycled are collected by an authorised waste management company. Satlink has also assisted, by taking part in various projects, in the collection of marine debris and beach litter.



The detail of the waste generated by Alba and its subsidiaries is as follows:

Waste generated	Total 2022	Total 2021	Total 2020
Type of waste			
Hazardous (tonnes)	429	2,907	334
Non hazardous (tonnes)	19,272	37,983	7,135
Total	19,701	40,890	7,469

A marked fall in the amount of waste has been detected following the changes in the scope of consolidation, Preving and Satlink being the subgroups that generated the greatest amount of waste.

## 5. ETHICS, HUMAN RIGHTS AND COMBATING CORRUPTION

### 5.1. Ethical behaviour and respect for human rights<sup>(14)</sup>

Alba's Code of Ethics and Conduct enshrines the values and principles that govern its conduct. The Code is applicable to anyone who has dealings with Alba as a result of discharging their duties or due to an employment, commercial or professional relationship. These values include most notably:

(14) GRI 3-3, GRI 3-2, GRI 2-23, GRI 2-26 y GRI 406-1.



# NON-FINANCIAL INFORMATION STATEMENT

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- Respect for human rights and commitment to the UN Global Compact, with which Alba is actively engaged as a signatory.
- Ethical behaviour in accordance with the law.
- Fair and respectful treatment based on equal opportunities and non-discrimination.
- Respect for the environment.
- Respect for the interests of other persons related to the Company.
- Prudence when performing business activities and assuming risks, and in relationships with customers.
- Rigour, integrity and transparency in data processing.

The Code of Ethics and Conduct sets out mandatory rules of conduct that must be complied with by Alba's employees, the members of its managing bodies and its Board of Directors alike, and by any third parties that have a relationship with Alba.

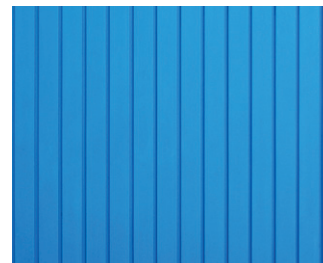
In view of the importance of internal whistleblowing channels, a more detailed procedure for processing reports was established; this procedure facilitates

communication, in a confidential manner and in certain circumstances anonymously, of any acts or conduct that may contravene the applicable legislation or the Code of Ethics and Conduct, either within the company or perpetrated by third parties that enter into contracts with the company or whose actions prove detrimental to it. The whistleblowing channel may be used by all internal personnel and individuals outside the Company, the latter including Alba's customers, suppliers, contractors and cooperating entities.

Each year, Alba's employees are reminded that the Code of Ethics and Conduct remains in force. The communication sent in 2022 contained a reminder of the general rules of conduct to be followed, the functions of the Monitoring Committee, the procedure for controlling compliance with the Code and the Whistleblowing Channel, which guarantees the confidentiality of the whistleblower's identity and sets out those circumstances in which anonymous reports are permissible.

No reports, suggestions or queries relating to the Code of Ethics and Conduct were received in 2022.

In its Code of Conduct the **Previg** subgroup undertakes to create areas of trust with its employees as the cornerstone of long-term relationships and the facilitator of greater



personal and professional development. It also undertakes to defend, observe and protect basic workers' rights through compliance with prevailing employment legislation and the elimination of forced labour, child labour and work carried out under arduous, extreme, inhuman or degrading circumstances. Aware that organisations can be prone to workplace harassment, it should be noted that Preving adopts a stance of zero tolerance with respect to conduct of this kind, attempting to avoid this type of attitude, and offers a procedure for conflict resolution. To this end, the company implements an anti-violence and/or psychological, sexual or gender-based harassment protocol which regulates the action to be taken in suspected cases and how to prevent, identify, evaluate and intervene in these situations.

The **Nuadi** subgroup also has a Code of Ethics in place that lays down the bases for professional conduct and the associated values, both for individuals who form part of the entity and for the third parties related to it, based on ongoing observance of human rights and the regulations established in each case. Nuadi's Code of Ethics was updated in 2022 with full implementation across the subgroup's locations.

The general rules of conduct of the **Satlink** subgroup's Code of Ethics explicitly state Satlink's commitment to human rights, making reference to its adherence to and respect for the United Nations Global Compact and the declarations of the International Labour Organisation. Any information received through formal and informal channels with respect to any practice (or suspected practice) contrary to the company's Code of Ethics shall be dealt with promptly in the event of a complaint against any parties associated with the company that might be involved. This includes personnel, customers and suppliers alike.

For its part, the **Gesdocument** subgroup has the following policies and procedures in place: Code of Conduct and Ethics; Harassment Prevention Code; and an Ethics Channel Communication Protocol. Each employee's onboarding process also includes a compulsory ethics training course, including an assessment of the knowledge acquired, on the second day of employment.

In 2022 Gesdocument's employees in Barcelona and Madrid received training in relation to the Code of Conduct and Ethics and this training will also be provided for employees at the Valencia, Bilbao and Zaragoza offices.

# NON-FINANCIAL INFORMATION STATEMENT

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It should be noted that in 2022 no complaints were received through the company's Ethics Channel.

The **Facundo** subgroup does not have a Code of Ethics and applies the provisions set out in the applicable collective agreements.

Facundo conducted a survey of the countries outside Spain where raw materials are acquired: China, US, Turkey, Argentina and France, which established that there is no actual risk of any infringements of human rights arising in the commercial relationships with companies in those countries.

## 5.2. Anti-corruption and anti-bribery management<sup>(15)</sup>

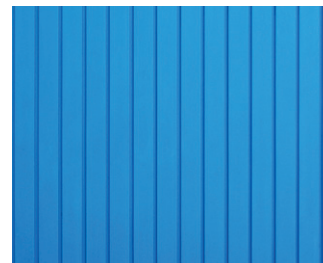
**Alba** adopts the measures required to ensure compliance with its duties of surveillance to prevent the offences envisaged in its Criminal Risk Prevention Model from being committed. Ethical values and responsible behaviour are observed in the day-to-day actions of all the individuals who form part of Alba. To safeguard those values and, in particular, to combat corruption in any of its forms, the Board of Directors approved a Criminal Risk and Fraud Prevention Policy in 2015.

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(15) GRI 3-3, GRI 3-2, GRI 2-23 y GRI 2-26.

This policy resulted in the creation of a Crime Prevention Model and a Crime Prevention Manual, which comprise a series of effective measures aimed at preventing, detecting and responding to criminal behaviours. The Model, which applies to directors, executives and employees, allows Alba to control situations in which irregularities may potentially be committed. It is founded on a series of principles – coordination and involvement of all professionals, transparency and communication, effective action, training, etc. – that ensure the proper implementation, monitoring and improvement of the Model. Agreements with third parties are also subject to clauses whereby the third parties undertake to control any situations in which there is a risk that serious crimes, offences or irregularities may be committed and to reject corruption and fraud, including extortion, bribery or bribery of a public official.

The general rules of conduct laid down in Alba's Code of Ethics and Conduct make a specific mention of bribes, commissions and gifts, and express its opposition to any attempt to sway the decisions of people outside Alba in order to obtain a benefit through unethical practices. The Code also prohibits other persons or entities from using such practices with Alba employees. Corporate hospitality and courtesy to civil servants in public tenders in which Alba participates, facilitation payments and



donations to trade unions and political parties, and donations or sponsorships to secure preferential treatment for Alba are prohibited. Gifts may only be accepted if they are not of significant economic value.

The Code of Ethics and Conduct also envisages compliance with legal provisions for the prevention of money laundering and of terrorist financing.

For its part, the **Preving** subgroup has a Crime Prevention Policy and, in relation to gifts, presents, invitations and other types of remuneration, establishes specific guidelines to limit and, in certain cases, prohibit gifts and invitations made or received by professionals of the subgroup. In addition, Preving's Code of Conduct expressly states that it will ensure and encourage respect for the rule of law and the fight against corruption in all its forms, demonstrating its firm commitment not to undertake practices in the course of its customer, provider, supplier, competitor and public authority relationships, etc. that could be considered improper, including those relating to money laundering.

The **Nuadi** subgroup has various documents, supplementary to the aforementioned Code of Ethics, which regulate and control any conflicts of interest that may arise in the conduct of its operations, or in relation to intellectual property and the confidentiality of information handled by the subgroup, which are applicable both in Spain and China. These documents are the "Confidentiality and Intellectual Property Agreement Non Solicitation Agreement – NUADI Europe", and the "Code of Ethics and Business Conduct – NUADI Europe v.2".

The **Satlink** subgroup applies, without exception, all the ethical and anti-corruption criteria adopted by the European Union in all the countries in which it operates.

The **Gesdocument** subgroup implements various internal anti-corruption codes within the company, such as the 2018 Harassment Prevention Code, the 2020 Anti-Money Laundering Manual, the 2020 Corporate Report and a 2018 Anti-Corruption Policy.

The **Facundo** subgroup does not implement a policy in this connection since, due to the nature of its business activities, the corruption and money laundering risks are considered to be low. However, these risks have been analysed and the greatest risks identified are associated with the misappropriation of small

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amounts of cash in the distribution to stores. In order to ensure control, cash amounts are collected and checked by different people. The risk with regard to bribery is considered to be very low and the policy in this connection is limited to listing good business practices.

## 6. INFORMATION ON THE COMPANY

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### 6.1. The company's sustainable development commitments<sup>(16)</sup>

In its Sustainability Policy **Alba** lays down the principles and areas involved in contributing to people's well-being and fostering the economic and social development of the communities in which the Group has a presence, while creating value for the various internal and external stakeholders. Alba's principal responsibility in terms of sustainability is to ensure the utmost diligence and integrity throughout the investment process. To achieve this, Alba's investments are founded on three principles:

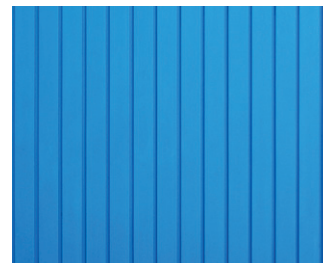
- a long-term view;
- responsible management, selecting assets over which it has the greatest capacity to exercise influence and achieve transformation; and
- mitigation of non-financial risks, which include social, environmental and governance risks.

Other noteworthy general principles and guidelines of conduct at Alba include the quest for excellence and the adoption of corporate governance best practices, respect for and promotion of human rights, a safe and healthy work environment and a firm commitment to environmental conservation.

Alba is also focused on its stakeholders, and has established the communication channels required to be able to respond to all their needs and expectations. The scope of application of Alba's pledges to act responsibly includes both the Company and the companies in its group. In addition, the Company strives to ensure that its representatives extend the adoption of these guidelines and principles of responsible conduct to all of its subsidiaries and investees. Through its investments, its own activities and the activities carried on by its investees, Alba signals its commitment to achieving the Sustainable Development Goals. As part of its commitment to Spain's UN Global Compact

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(16) GRI 3-3, GRI 3-2, GRI 2-6, GRI 2-28 y GRI 2-29.



Initiative, Alba also participates in the training activities organised by this platform and submits the required Communication on Progress report. Thus, in 2022 Alba attended eleven meetings in which sustainable development related issues were addressed.

In 2022 Alba made a monetary contribution of EUR 50,000 to the "I Have a Home" Foundation (Fundación Tengo Hogar) for a project to support Ukrainian refugee families in Spain.

Alba has formed part of Emisores Españoles since its foundation in 2009; this association, which comprises Spanish listed companies representing more than 70% of the Spanish equity market and 75% of the IBEX 35 index, fosters the development of high standards of good governance at listed companies.

In 2020 Alba adhered to the Spanish Tax Agency's Code of Good Tax Practices promoted by the Forum of Large Companies.

In addition, in 2022 Alba made economic contributions to the Foundation of the Institute Juan March of Study and Research (Fundación Instituto Juan March de Estudios e Investigaciones) and the Foundation for the Study of Applied Economics (Fundación de Estudios de Economía Aplicada (FEDEA)) totalling EUR 309,500.

The **Preving** subgroup has entered into cooperation agreements with various Spanish universities and vocational training institutions to receive students on placement as part of their master's degree in occupational risk prevention and vocational training students on occupational risk technician courses, to enable them to acquire practical knowledge in their chosen course of study and relevant work experience to enter the labour market. The company participates in and sponsors forums such as "Talent day", organised by "Teams and Talent", and collaborates with the Ubuntu Foundation which promotes a volunteer programme in which eight employees travel to Sierra Leona each year to cooperate in the projects the Foundation carries out there. Preving has also collaborated with various entities and associations such as the Spanish Association of Privacy Professionals (Asociación Profesional Española De Privacidad), Centre for Human Resources Management (Asociación Centro de Dirección de RRHH (Madrid)), Association of Training Institutions of Extremadura (Empresas de Formación de Extremadura (CECAP Extremadura)), Registry of Government and IT Advisers of the General Council of Economists (Asesores de Gobierno y Sistemas de la Información del Consejo General de Economistas (RASL-CGE)), Training and Company Association (AFORMAE) and Albacete Confederation

# NON-FINANCIAL INFORMATION STATEMENT

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of Business Owners (FEDA), among others. The subgroup also has scheduled investments in various innovation projects for the period spanning 2019 to 2023. The main project involves the creation of an R&D&I department which will be staffed by two highly reputable professionals in the research field.

The **Nuadi** subgroup made an economic contribution to Unicef.

In 2022 the **Satlink** subgroup made economic contributions to various not-for-profit organisations amounting to EUR 22,000.

The **Gesdocument** subgroup collaborates with various universities in the field of job creation, and provides final-year and master's degree students with work experience to help them begin their professional development, and, depending on their progress and the company's hiring needs, they may join Gesdocument's workforce.

Gesdocument also collaborates with a variety of Spanish and international associations and institutions, such as Partners Immigration, Posted Workers Alliance, British Chamber of Commerce, HR Providers, Economía 3, E&J, etc., in order to contribute towards advancing society.

With regard to the **Facundo** subgroup, this company was founded and carries on its business activities in Villada, a town of few inhabitants in the province of Palencia. Facundo collaborates with local authorities in any activities they propose either free of charge or by providing funding.

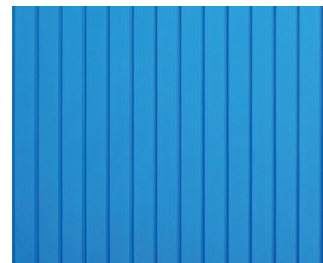
The company has always been firmly committed to local development and the Villada plant is a source of employment for local inhabitants, thereby helping to prevent depopulation, which is extremely important in rural areas.

## 6.2. Subcontracting and suppliers <sup>(17)</sup>

**Alba** applies the principles and values defined in its Code of Ethics and Conduct to its entire value chain, including all the contractors, suppliers and cooperating entities that have a commercial relationship with Alba. Accordingly, in their contracts and collaboration agreements they undertake to observe and respect human rights, the environment, legal compliance and ethical principles.

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(17) GRI 3-3, GRI 308-1 y GRI 414-1.



The **Preving** subgroup regards suppliers and cooperating entities as a strategic interest group, fostering relationships based on trust, information transparency and the sharing of knowledge, experience and skills within the context of the principles of the contracting and supplier relationship policy laid down by the group.

As a result, suppliers are chosen based on objective, impartial, transparent and non-discrimination criteria, by defining supplier selection and contracting processes that comply with the solvency, technical suitability, quality, price and ethical standards laid down by the Preving subgroup.

The **Nuadi** subgroup has an internal procurement procedure in place for the suppliers used in its product and manufacturing process.

Although its suppliers are not required to implement a policy in this connection, Nuadi does welcome those suppliers which adopt a proactive approach to identifying environmental issues in order to be able to assess their impact and implement improvements.

In addition, Nuadi implements an audit system in line with the Automotive Industry Association (VDA) standard for suppliers, in accordance with an annual schedule based on each supplier's level of performance and risk.

Sadeca does not have a procurement policy in place; however, suppliers are furnished with the Suppliers Manual and its Code of Ethics, and when engaging suppliers it takes into account environmental criteria such as certification, proximity, packaging and transport optimisation, among other factors, and criteria relating to compliance with legal and regulatory requirements, as established in the Suppliers Manual.

Sadeca also considers whether the supplier holds ISO 14001 certification and if not it is requested to complete an environmental questionnaire. An annual supplier audit plan is also in place which classifies the company's suppliers based on criteria such as strategic importance, level of certification, standard of quality and service, and responsiveness, among others.

On the basis of its responsible procurement programme, the **Satlink** subgroup carries out an ongoing assessment of its suppliers and contractors with regard to their compliance with environmental, quality and occupational safety requirements; suppliers and contractors are assessed in terms of product and process quality, as well as social and environmental responsibility. Also, the general rules of conduct laid down in Satlink's Code of Ethics declare its commitment to gender equality policies and environmental guidelines, both with regard to



# NON-FINANCIAL INFORMATION STATEMENT

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their definition and the principles of action for its stakeholders, including its suppliers. In the Code of Ethics, Satlink underlines its adherence and commitment to the United Nations Global Compact and to the declarations of the International Labour Organisation.

The **Gesdocument** subgroup's Code of Ethics addresses guidelines and standards that cover all the companies in its value chain.

The **Facundo** subgroup works with Spanish and international suppliers. Its supplier in China has been awarded the BRC Food Safety certification.

## 6.3. Consumers<sup>(18)</sup>

**Alba** and its subsidiaries apply the required consumer health and safety procedures and provide consumers with the appropriate communication mechanisms in each case to lodge complaints and make claims, adapting the mechanism to the type of activity carried on at each entity.

With respect to its real estate business, **Alba** implements all the necessary health and safety measures.

It also provides all the resources required to coordinate business activities in the buildings owned by it through a document platform to allow tenants and other users to access general documentation for the building.

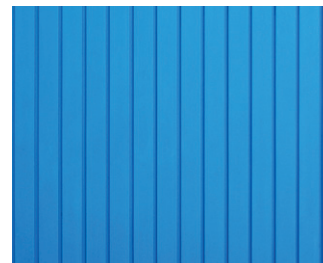
The leases with tenants and the internal regulations of the buildings establish the appropriate channels for processing the various requirements that may arise and an ongoing, seamless relationship is maintained with tenants.

To guarantee the health of those using the buildings it operates, Alba has implemented a range of measures: green spaces have been installed inside the Castellana 42 building, bringing about an improvement in air quality; the Castellana 42 and Castellana 89 buildings have air ionisation system to remove pathogens and detect CO<sub>2</sub> and air quality is monitored.

Alba maintains records of personal data processing activities in relation to its employees, shareholders and electronic forum for shareholders, customers, suppliers, individuals affected in the area of the securities markets, the whistleblowing channel, queries relating to the Code of Ethics and Conduct, building access controls and CCTV surveillance measures.

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[18] GRI 3-3 y GRI 207-4.



Alba implements various layer- or service-based cybersecurity protection measures to safeguard the data stored in its IT systems: firewalls, AV systems, email anti-phishing tools. All customer PCs and servers have EDR systems installed and the services of a SOC (Security Operations Centre) for ongoing surveillance. As part of the contingency plan and the business continuity plan, Alba has two CDP storage systems in place to maintain the infrastructure required to support the business from a technological point of view and a data replication system. Security copies and replications are retained over time based on requirements (daily, weekly, month, annually, etc.). Policies for robust password security, differentiation of permissions by role, etc. are in place for local identity management and two-factor authentication is used for IT critical role identity management.

Alba's employees are also provided with cybersecurity training in the form of emails containing snippets of related information. 18 information snippets were sent in 2022 and may be accessed at any time on the company's intranet.

The **Preving** subgroup has specific measures in place to guarantee the health and safety of the customers of the services it offers; there is a complaint and claim management system on the intranet, where employees can submit all the complaints and claims made by customers. Preving also offers a centralised customer care service that handles complaints and claims over the telephone. Complaints are managed in real time and reported on a monthly basis. Half-yearly customer loyalty reports, detailing the action plans implemented, are prepared and shared with subgroup management. To ensure good service provision, Preving employs an NPS satisfaction survey system through which it conducts regular surveys with customers and stakeholders.

Various channels are available to customers to share incidents, recommendations or thoughts concerning the products or services received: telephone call, email, a complaint form in paper format, the customer extranet, virtual complaint form, etc. Preving undertakes to provide a response within 48 hours and to close the complaint within 72 hours.

Compliance with the occupational risk prevention legislation is also a priority for Preving, and strict monitoring and control is implemented with regard to preventive planning.

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Preving's commitment to customer data protection is evidenced by its compliance with the legislation of the Spanish Data Protection Agency and all other relevant legislation.

The **Nuadi** subgroup has a cybersecurity system in place to protect its customers' data, as well as a firewall, a system to monitor and record access to control undesired connections, and equipment and services installed with antivirus systems. Regular vulnerability controls and software and firmware updates are performed. Nuadi's contingency plan includes solutions involving making daily and weekly security copies and replications. Security policies have been created for the services located on in-house servers and a password complexity factor has been established. Access to information is assigned to users on the basis of their role definition. Roles considered to be critical access information by means of two-factor authentication.

It should also be noted that Nuadi has implemented a certified management system based on the IATF (International Automotive Task Force) standard. This standard is fully customer oriented and the claim management and customer satisfaction monitoring processes are key in order to achieve certification.

Sadeca also implements a claim management system accessed by means of the ISC which gathers quarterly data at global level and with respect to the four or five principal customers. This solution analyses delivery timeliness, urgent transport, quality claims or production line stoppages, etc.

One of the **Satlink** subgroup's distinguishing strengths is its knowledge of customers' needs. This knowledge is achieved through its close relationship with customers and the speed of its response to customers' needs, complaints and claims, which it provides by means of an open communication channel, frequent visits and a professional service, a service that sets up installations all around the world and has a 24/7 call centre service. In addition, Satlink's sales departments systematically conduct customer satisfaction surveys at least once a year.

Satlink also guarantees consumer, customer and user security, ensuring compliance with the General Data Protection Regulation (GDPR) by means of an agreement with Secure IT.

The **Gesdocument** subgroup is currently working on rolling out improvements in its customer management procedures. Accordingly, customer cases, complaints and incidents communicated by customers or

professionals are recorded in the CRM and the actions taken to resolve these issues are monitored.

Implementation of a system to measure customer satisfaction commenced in 2022, and development will continue in 2023, with the performance of quality surveys with all the customers, which will be stored to enable assessment by customer, by service, and in terms of the team/professional assigned to each customer.

The **Facundo** subgroup has a Quality and Food Safety Policy in place to ensure the performance of the operating procedures required to maintain high standards of food safety and to guarantee the well-being of its consumers. It has also implemented a mandatory system for food business operators (Regulation (EC) no. 852/2004), relating to hazard analysis and critical control points (HACCP), which makes it possible to reduce the probability of food poisoning (potential contamination of food by microbial, physical or chemical contaminants) occurring. Implementation of this policy and these procedures guarantees the safety of the foods produced and the health and safety of Facundo's consumers, customers and users.

## 7. EU TAXONOMY FOR SUSTAINABLE INVESTMENT

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The EU Taxonomy reporting of Alba and its subsidiaries is driven by Regulation (EU) 2020/852 of the European Parliament and of the Council published on 22 June 2020. The purpose of this regulation is to facilitate the decarbonisation of the European economic system through the provision of a framework for determining environmentally sustainable economic activities. Substantial contribution to the six environmental objectives laid down in Article 9 of the Regulation will also be determined.

In July 2021, Commission Delegated Regulation (EU) 2021/2139, of 4 June 2021, supplementing Regulation (EU) 2020/852, establishing the technical screening criteria (TSC) for the first two environmental objectives in respect of climate change mitigation or climate change adaptation, was published. The undertakings subject to the obligation to disclose non-financial information, as envisaged by Law 11/2018, of 28 December, which transposes Directive 2014/95/EU, of the European Parliament and of the Council, will be required to disclose to what extent their activities align with the EU taxonomy provisions.

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In addition, Commission Delegated Regulation (EU) 2021/2178, of 6 July 2021, supplementing Regulation (EU) 2020/852, specifies the content and presentation of information to be disclosed by undertakings subject to the EU Non-Financial Reporting Directive ("NFRD"). In this regard, in this chapter, compliance is achieved with the requirements set by Delegated Regulation (EU) 2021/2178 on the basis of the activity data for 2022. Continuing with the taxonomy exercise conducted in 2021, which was completed with the publication of the eligible financial indicators according to the activities of Delegated Regulation (EU) 2021/2139, a review was performed of the activities identified as eligible in accordance with the mitigation and adaptation criteria established in the Regulation.

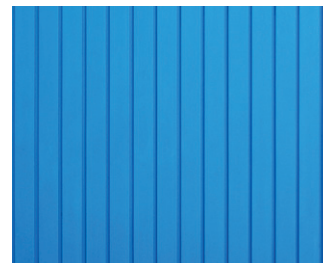
## 7.1. Compliance with the EU taxonomy

Alba is an investment holding company and its object is the acquisition of long-term ownership interests in listed and non-listed companies with activities in various economic sectors. Alba is primarily owned by the shareholders of the March Group, which is one of Spain's principal private family-controlled financial groups in Spain. Currently, Alba's investments are in listed companies, non-listed companies and property assets.

In accordance with the legislation on the disclosure of non-financial and diversity information, the Company must disclose the proportion of eligible and non-eligible, aligned and non-aligned activities in accordance with the EU taxonomy and the KPIs related to turnover, capital expenditure (CapEx) and operating expenditure (OpEx).

Taxonomy-eligible economic activities are those included in the list set out in the EU Taxonomy Regulation which will potentially contribute to the objectives defined in compliance with the technical screening criteria established for the climate change mitigation and adaptation objectives. Taxonomy non-eligible economic activities are, therefore, those which either do not comply with the terms set out in the Regulation and/or are not included in the list of taxonomy-eligible activities defined in the Regulation.

Aligned activities are eligible activities that meet the substantial contribution criteria (SCC) for at least one of the mitigation or adaptation objectives set out in the taxonomy, that do no significant harm (DNSH) to any other environmental objective and are performed in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights (Minimum Social Safeguards). Non-aligned eligible activities



are, therefore, activities that do not meet any of the requirements of the alignment analysis phases described above (SCC, DNSH and Safeguards).

## 7.2. Analysis and calculation procedure

The calculation of the indicators required by the EU taxonomy for sustainable investment was based on the analysis of the eligibility of the activities carried on by Alba and its subsidiaries in accordance with the scope defined for this report.

To this end, the description of the various economic activities performed by Alba and its subsidiaries has been taken into consideration. Moreover, to avoid duplicated accounting, the percentages assigned to just one activity, whether it is a mitigation and adaptation activity, have been accounted for. The various key performance indicators required in accordance with the Taxonomy Regulation have been determined for each of the economic activities and include the denominator for turnover, CapEx and OpEx of Alba and its subsidiaries at 2022 year-end.

- Turnover: the proportion of the turnover referred to in Article 8.2 a) of Regulation (EU) 2020/852 was calculated as the portion of the turnover from products or

services, including immaterial products and services, associated with taxonomy-aligned economic activities (numerator), divided by the turnover (denominator) as defined in Article 2.5 of Directive 2013/34/EU.

- CapEx: the numerator includes the calculation of CapEx associated with the activities determined to be taxonomy-eligible economic activities based on the analysis performed by Alba and its subsidiaries. The numerator will include the part of the capital expenditure included in the denominator that is any of the following:
  - a) related to assets or processes that are associated with taxonomy-aligned economic activities;
  - b) part of a plan to expand taxonomy-aligned economic activities or to allow taxonomy-eligible economic activities to become taxonomy-aligned ("CapEx plan") under the conditions specified in the second subparagraph of this point 1.1.2.2 (relating to the "CapEx plan");
  - c) related to the purchase of output from taxonomy-aligned economic activities and individual measures enabling the target activities to become low-carbon or to lead to greenhouse gas reductions, notably activities listed in points 7.3 to

# NON-FINANCIAL INFORMATION STATEMENT

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7.6 of Annex I to the Climate Delegated Act (CDA), as well as other economic activities listed in the delegated acts adopted pursuant to Article 10(3), Article 11(3), Article 12(2), Article 13(2), Article 14(2) and Article 15(2) of Regulation (EU) 2020/852 and provided that such measures are implemented and operational within 18 months.

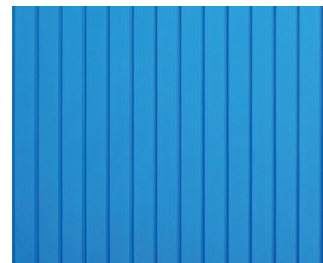
The CapEx denominator includes the additions to tangible and intangible assets during the financial year considered before depreciation, amortisation and any re-measurements, including those resulting from revaluations and impairments, corresponding to 2022 of Alba and its subsidiaries, and excluding fair value changes.

- OpEx: the numerator includes the calculation of eligible OpEx in accordance with the economic activities determined to be taxonomy-eligible economic activities based on the analysis performed. The numerator is equal to the part of the operating expenditure included in the denominator that is any of the following:

a) related to assets or processes associated with taxonomy-aligned economic activities;

b) part of the CapEx plan to expand taxonomy-aligned economic activities or allow taxonomy-eligible economic activities to become taxonomy-aligned within a predefined timeframe as set out in the second paragraph of this point 1.1.2.2;

c) related to the purchase of output from taxonomy-aligned economic activities and individual measures enabling the target activities to become low-carbon or to lead to greenhouse gas reductions, notably activities listed in points 7.3 to 7.6 of Annex I to the Climate Delegated Act (CDA), as well as other economic activities listed in the delegated acts adopted pursuant to Article 10(3), Article 11(3), Article 12(2), Article 13(2), Article 14(2) and Article 15(2) of Regulation (EU) 2020/852 and provided that such measures are implemented and operational within 18 months.



The denominator includes direct non-capitalised costs that relate to research and development, building renovation measures, short-term leases, maintenance and repairs, and any other direct expenditures relating to the day-to-day servicing of items of property, plant and equipment by the undertaking or third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets. Since at the date of this report the IT systems of Alba and its subsidiaries do not provide a breakdown of the specific data relating to the nature of the expenditure required in accordance with the Regulation, and given the nature of the activities carried on, this key performance indicator was prepared based on “Other Operating Expenses” in the consolidated financial statements of Alba and its subsidiaries.

### *Analysis of alignment of eligible activities*

On the basis of the eligible activities, a review and analysis was conducted of the criteria included in Annexes I and II to the Climate Delegated Regulation.

The technical interpretation of the activities identified as eligible and used as the basis for the alignment analysis is set out below:

- Activities contributing to climate change mitigation:

**Activity 7.7 Acquisition and ownership of buildings:** this category includes the acquisition of real estate and exercise of the associated ownership rights, carried on by Alba Patrimonio Inmobiliario, S.A. in relation to five buildings in Madrid. All of these buildings were built before 31 December 2020 and, therefore, according to the TSC, to contribute substantially to climate change mitigation, they should have at least a Class A energy efficiency certificate or, alternatively, form part of the 1.5% of the most energy-efficient buildings in the national or regional building stock in terms of primary energy demand. In addition, since they are large non-residential buildings, they must be managed efficiently through the control and evaluation of their energy efficiency.

At the end of 2022, the analysis performed indicated that the buildings did not possess an energy efficiency certificate similar to that requested in the TSC and there were no plans for the control and evaluation of the energy efficiency of the buildings analysed. As a result, it was concluded that this activity could not be considered to be taxonomy-aligned because it did not meet the TSC. Also, in order to meet the DNSH criteria and, specifically, the climate change adaptation objective, there is no analysis of the physical climate risks or specific climate change adaptation plans



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for the buildings, although Alba does have in place certain mechanisms required by the Minimum Social Safeguards established by the Regulation, at corporate level.

Work will be carried out in the coming years to analyse the progress required in relation to adaptation to these criteria in order to align the Company's business model with the Regulation's requirements, thereby fostering the transition to a more sustainable economy.

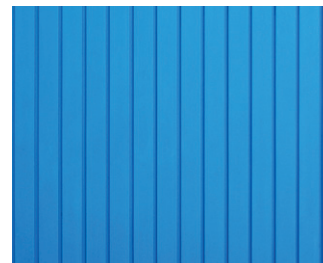
- Activities contributing to climate change adaptation:

**Activity 11 Education:** this category includes the education activities carried on by the entity Formalia, which is part of the Preving subgroup. The object of this entity is to perform training activities in different programmes and at different levels, focusing mainly on health and safety training. According to the TSC, in order to contribute to climate change adaptation, these activities should apply adaptation solutions to reduce the most significant and material physical climate risks for the activity, which should be determined on the basis of an evaluation of the applicable vulnerabilities and climate risks as defined in the Appendix to Annex II to the Delegated Act. Based on this analysis, the TSC also require climate-related projections and impact assessments to be applied in accordance with

the available best practices and guidelines, and the adaptation solutions applied must also meet a series of criteria included in the TSC for the mentioned activity. Given that, in relation to Formalia's education activities during the consolidated period in Alba's financial statements, no climate risk analyses were conducted as described in the Regulation, nor were any adaptation solutions applied to reduce these risks, the activity is not deemed to be a taxonomy-aligned activity with respect to the climate change adaptation objective.

## 7.3. Results in 2022

The analysis conducted showed that 8.2% of the turnover, 2.6% of the CaPex and 0.4% of the OpEx of Alba and its subsidiaries in 2022 are taxonomy-eligible activities, although the analysis did not identify any activities that are actually taxonomy-aligned.



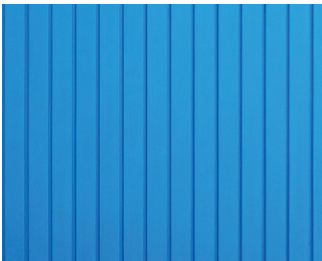
The information contained in this report takes into account the methodology applied by Alba and its subsidiaries, and the results obtained in the second year measured in order to comply with Taxonomy for Sustainable Investment Regulation (EU) 2020/852. However, developments in understanding and sectorial positions, the development of new implementation guidance and publication of the four remaining environmental objectives could give rise to amendments and restatement of the information obtained in this analysis.

The detail of the results obtained from the analysis is as follows:

# NON-FINANCIAL INFORMATION STATEMENT

## TAXONOMY-ALIGNMENT BY ACTIVITY AND ENVIRONMENTAL OBJECTIVE

TURNOVER				Substantial contribution criteria		DNSH	
Codes	Economic activities	Absolute turnover (€)	Proportion of turnover (%)	Climate change mitigation (%)	Climate change adaptation (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)
A. TAXONOMY-ELIGIBLE ACTIVITIES							
A.1. Environmentally sustainable activities (taxonomy-aligned) (eligible and aligned)							
7.7.	Acquisition and ownership of buildings	€ 0.00	0.0%	0.0%	0.0%	Y	n.a.
11.1	Education	€ 0.00	0.0%	0.0%	0.0%	n.a.	Y
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (eligible and non-aligned)							
7.7.	Acquisition and ownership of buildings	€ 12,976,733.04	7.6%				
11.1	Education	€ 945,148.90	0.6%				
Total (A.1 + A.2)		€ 13,921,881.94	8.2%				
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES							
Turnover of taxonomy-non-eligible activities (B)		€ 156,300,465.61	91.8%				
Total (A + B)		€ 170,222,347.55	100.0%				

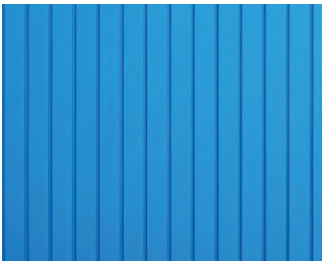


	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum social safeguards (Y/N)	Taxonomy aligned proportion of turnover (%)	Category (enabling activity) (E)	Category (transitional activity) (T)
	n.a.	n.a.	n.a.	n.a.	Y	0.00%		
	n.a.	n.a.	n.a.	n.a.	Y	0.00%	E	
						0.00%		

# NON-FINANCIAL INFORMATION STATEMENT

## TAXONOMY-ALIGNMENT BY ACTIVITY AND ENVIRONMENTAL OBJECTIVE

CapEx				Substantial contribution criteria		DNSH		
Codes	Economic activities	Absolute CapEx (€)	Proportion of CapEx (%)	Climate change mitigation (%)	Climate change adaptation (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	
A. TAXONOMY-ELIGIBLE ACTIVITIES								
A.1. Environmentally sustainable activities (taxonomy-aligned) (eligible and aligned)								
7.7.	Acquisition and ownership of buildings	€ 0.00	0.0%	0.0%	0.0%	Y	n.a.	
11.1	Education	€ 0.00	0.0%	0.0%	0.0%	n.a.	n.a.	
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (eligible and non-aligned)								
7.7.	Acquisition and ownership of buildings	€ 2,240,706.06	2.6%					
11.1	Education	€ 0.00	0.0%					
Total (A.1 + A.2)		€ 2,240,706.06	2.6%					
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES								
Turnover of taxonomy-non-eligible activities (B)		€ 82,396,931.76	97.4%					
Total (A + B)		€ 84,637,637.82	100.0%					

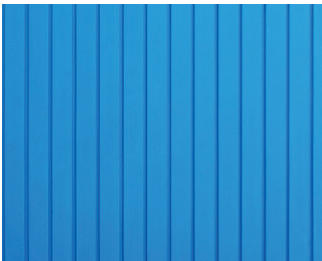


	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum social safeguards (Y/N)	Taxonomy aligned proportion of CapEx (%)	Category (enabling activity) (E)	Category (transitional activity) (T)
	n.a.	n.a.	n.a.	n.a.	Y	0.00%		
	n.a.	n.a.	n.a.	n.a.	Y	0.00%	E	
						0.00%		
						0.00%		

# NON-FINANCIAL INFORMATION STATEMENT

## TAXONOMY-ALIGNMENT BY ACTIVITY AND ENVIRONMENTAL OBJECTIVE

OpEx				Substantial contribution criteria		DNSH		
Codes	Economic activities	Absolute OpEx (€)	Proportion of OpEx (%)	Climate change mitigation (%)	Climate change adaptation (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	
A. TAXONOMY-ELIGIBLE ACTIVITIES								
A.1. Environmentally sustainable activities (taxonomy-aligned) (eligible and aligned)								
7.7.	Acquisition and ownership of buildings	€ 0.00	0.0%	0.0%	0.0%	Y	n.a.	
11.1	Education	€ 0.00	0.0%	0.0%	0.0%	n.a.	n.a.	
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (eligible and non-aligned)								
7.7.	Acquisition and ownership of buildings	€ 172,894.93	0.6%					
11.1	Education	€ (43,907.34)	(0.2%)					
Total (A.1 + A.2)		€ 128,987.59	0.4%					
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES								
Turnover of taxonomy-non-eligible activities (B)		€ 28,845,862.21	99.6%					
Total (A + B)		€ 28,974,849.80	100.0%					



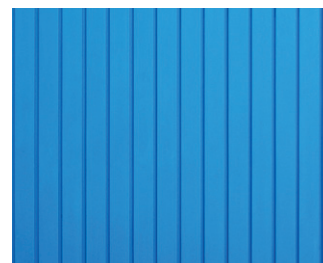
	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum social safeguards (Y/N)	Taxonomy aligned proportion of OpEx (%)	Category (enabling activity) (E)	Category (transitional activity) (T)
	n.a.	n.a.	n.a.	n.a.	Y	0.00%		
	n.a.	n.a.	n.a.	n.a.	Y	0.00%	E	
						0.00%		
						0.00%		



# NON-FINANCIAL INFORMATION STATEMENT

## 8. NON-FINANCIAL INFORMATION STATEMENT TABLE OF CONTENTS

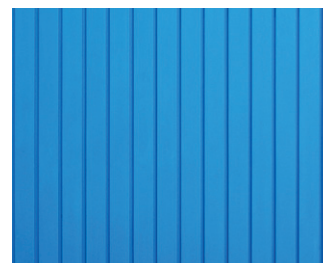
Contents of Spanish Law 11/2018 on Non-Financial Information Statements		Standard used	Section of the report
<b>Business model</b>			
Description of the Group's business model	<ul style="list-style-type: none"> <li>• Description of the business model.</li> <li>• Location of operations.</li> <li>• Objectives and strategies.</li> <li>• Main factors and trends that could affect its future evolution.</li> </ul>	GRI 2-6	2. Business model
Main risks	<ul style="list-style-type: none"> <li>• Main risks and impacts arising from the group's activities and management thereof.</li> </ul>	GRI 2-6	2. Business model
<b>Information on environmental matters</b>			
Policies	<ul style="list-style-type: none"> <li>• Management approach.</li> </ul>	GRI 3-3	4.1 Information on environmental matters – Policies
Risk	<ul style="list-style-type: none"> <li>• Material topics.</li> </ul>	GRI 3-2	4.1 Information on environmental matters – Policies
General	<ul style="list-style-type: none"> <li>• Effects of the company's activities on the environment, health and safety.</li> </ul>	GRI 3-3	4.1 Information on environmental matters – Policies
	<ul style="list-style-type: none"> <li>• Environmental certification or assessment procedures.</li> </ul>	GRI 3-3	4.1 Information on environmental matters – Policies
	<ul style="list-style-type: none"> <li>• Resources used to prevent environmental risks.</li> </ul>	GRI 3-3	4.1 Information on environmental matters – Policies
	<ul style="list-style-type: none"> <li>• Application of the precautionary principle.</li> </ul>	GRI 3-3	4.1 Information on environmental matters – Policies
	<ul style="list-style-type: none"> <li>• Provisions and guarantees for environmental risks.</li> </ul>	GRI 2-27	Note 17 to the consolidated financial statements of Corporación Financiera Alba, S.A. and Subsidiaries for 2022



Contents of Spanish Law 11/2018 on Non-Financial Information Statements		Standard used	Section of the report
Information on environmental matters (cont.)			
Pollution	<ul style="list-style-type: none"> <li>Measures to prevent pollution.</li> </ul>	GRI 3-3	4.2.1 Energy and climate change
Circular economy and waste prevention and management	<ul style="list-style-type: none"> <li>Waste prevention and management measures.</li> </ul>	GRI 3-3	4.2.2 Sustainable use of resources and circular economy
	<ul style="list-style-type: none"> <li>Water use.</li> </ul>	GRI 303-3	4.2.2 Sustainable use of resources and circular economy
Sustainable use of resources	<ul style="list-style-type: none"> <li>Consumption of raw materials.</li> </ul>	GRI 301-1	4.2.2 Sustainable use of resources and circular economy
	<ul style="list-style-type: none"> <li>Direct and indirect energy consumption.</li> <li>Measures to improve energy efficiency.</li> <li>Use of renewable energies.</li> </ul>	GRI 3-3, GRI 302-1, GRI 302-2, GRI 302-4	4.2.1 Energy and climate change
	<ul style="list-style-type: none"> <li>Greenhouse gas (GHG) emissions.</li> </ul>	GRI 305-1	4.2.1 Energy and climate change
Climate change	<ul style="list-style-type: none"> <li>Measures to adapt to climate change.</li> </ul>	GRI 3-3	4.2.1 Energy and climate change
	<ul style="list-style-type: none"> <li>GHG reduction targets.</li> </ul>	GRI 3-3	4.2.1 Energy and climate change
Protection of biodiversity	<ul style="list-style-type: none"> <li>Measures taken to conserve or restore biodiversity.</li> </ul>	GRI 3-3	Not material
	<ul style="list-style-type: none"> <li>Impacts caused by the activity.</li> </ul>	GRI 304-3	Not material

# NON-FINANCIAL INFORMATION STATEMENT

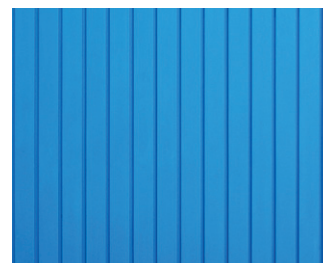
Contents of Spanish Law 11/2018 on Non-Financial Information Statements		Standard used	Section of the report
Information on social and personnel-related matters			
Policies	<ul style="list-style-type: none"> <li>• Management approach.</li> </ul>	GRI 3-3	3.1 Information on social and personnel related matters – Policies
Risk	<ul style="list-style-type: none"> <li>• List of material topics.</li> </ul>	GRI 3-2	3.1 Information on social and personnel related matters – Policies
Employment	<ul style="list-style-type: none"> <li>• Total number of employees and breakdown by gender, age, country and professional category.</li> </ul>	GRI 2-7, GRI 405-1	3.2.1 Employment and remuneration
	<ul style="list-style-type: none"> <li>• Total number and distribution of employment contracts by type.</li> </ul>		3.2.1 Employment and remuneration
	<ul style="list-style-type: none"> <li>• Annual average of indefinite-term, temporary and part-time employment contracts by gender, age and professional category.</li> </ul>		3.2.1 Employment and remuneration
	<ul style="list-style-type: none"> <li>• Number of dismissals by gender, age and professional category.</li> </ul>		3.2.1 Employment and remuneration
	<ul style="list-style-type: none"> <li>• Average remuneration by gender, age and professional category or equal value.</li> </ul>	GRI 405-2	3.2.1 Employment and remuneration
	<ul style="list-style-type: none"> <li>• Gender pay gap.</li> </ul>		3.2.1 Employment and remuneration
	<ul style="list-style-type: none"> <li>• Remuneration of identical job positions or average remuneration at the company.</li> </ul>		3.2.1 Employment and remuneration
	<ul style="list-style-type: none"> <li>• Average remuneration, by gender, of directors and executives.</li> </ul>		Note 27 to the consolidated financial statements of Corporación Financiera Alba, S.A. and Subsidiaries for 2022.  In 2022, 40% of the members of the Board of Directors were women.
	<ul style="list-style-type: none"> <li>• Implementation of disconnection from work measures.</li> </ul>	GRI 3-3	3.2.2 Organisation of working time
	<ul style="list-style-type: none"> <li>• Employees with a disability.</li> </ul>	GRI 405-1	3.2.1 Employment and remuneration



Contents of Spanish Law 11/2018 on Non-Financial Information Statements		Standard used	Section of the report
Information on social and personnel-related matters (cont.)			
Organisation of work	• Organisation of working hours.	GRI 3-3	3.2.2 Organisation of working time
	• Number of hours of absenteeism.	GRI 403-9	3.2.2 Organisation of working time
	• Measures to achieve work-life balance.	GRI 3-3	3.2.2 Organisation of working time
Health and safety	• Occupational health and safety conditions.	GRI 3-3	3.2.3 Health and safety
	• Accident rate by gender.	GRI 403-9	3.2.3 Health and safety
	• Occupational ill-health.	GRI 403-10	3.2.3 Health and safety
Labour/management relationships	• Organisation of labour/management dialogue.	GRI 3-3	3.2.4 Labour/management relationships
	• Percentage of employees covered by collective agreements.	GRI 2-30	3.2.4 Labour/management relationships
	• Assessment of collective agreements in the occupational health and safety area.	GRI 3-3	3.2.4 Labour/management relationships
	• Mechanisms and procedures available to the company to promote employee involvement in the management of the company, in terms of information, consultation and participation.	GRI 3-3	3.2.4 Labour/management relationships
Training	• Training policies.	GRI 3-3	3.2.5 Training
	• Total number of hours of training by employee category.	GRI 404-1	3.2.5 Training
Accessibility	• Universal accessibility for people with disabilities.	GRI 3-3	3.2.6 Accessibility and equal opportunity
Equal opportunity	• Measures for equality between men and women.	GRI 3-3	3.2.6 Accessibility and equal opportunity
	• Equality plans.		3.2.6 Accessibility and equal opportunity
	• Measures to promote employment.		3.2.6 Accessibility and equal opportunity
	• Protocols against sexual and gender-based harassment.		3.2.6 Accessibility and equal opportunity
	• Universal accessibility for people with disabilities.		3.2.6 Accessibility and equal opportunity
	• Anti-discrimination and diversity management policy.		3.2.6 Accessibility and equal opportunity

# NON-FINANCIAL INFORMATION STATEMENT

Contents of Spanish Law 11/2018 on Non-Financial Information Statements		Standard used	Section of the report
<b>Information on respect for Human Rights</b>			
Policies	<ul style="list-style-type: none"> <li>• Management approach.</li> </ul>	GRI 3-3	5.1 Ethical behaviour and respect for Human Rights
Risk	<ul style="list-style-type: none"> <li>• Material topics.</li> </ul>	GRI 3-2	5.1 Ethical behaviour and respect for Human Rights
Human Rights	<ul style="list-style-type: none"> <li>• Performance of due diligence reviews.</li> </ul>	GRI 2-23, GRI 2-26, GRI 406-1	5.1 Ethical behaviour and respect for Human Rights
	<ul style="list-style-type: none"> <li>• Measures to prevent and manage possible instances of abuse.</li> </ul>		5.1 Ethical behaviour and respect for Human Rights
	<ul style="list-style-type: none"> <li>• Complaints of violations of Human Rights.</li> </ul>		5.1 Ethical behaviour and respect for Human Rights
	<ul style="list-style-type: none"> <li>• Promotion and fulfilment of the provisions of the ILO.</li> </ul>		5.1 Ethical behaviour and respect for Human Rights
<b>Information on combating corruption and bribery</b>			
Policies	<ul style="list-style-type: none"> <li>• Management approach.</li> </ul>	GRI 3-3	5.2 Combating corruption and bribery
Risk	<ul style="list-style-type: none"> <li>• Material topics.</li> </ul>	GRI 3-2	5.2 Combating corruption and bribery
Corruption and bribery	<ul style="list-style-type: none"> <li>• Anti-corruption and anti-bribery measures.</li> </ul>	GRI 2-23, GRI 2-26	5.2 Combating corruption and bribery
	<ul style="list-style-type: none"> <li>• Anti-money laundering measures.</li> </ul>		5.2 Combating corruption and bribery
	<ul style="list-style-type: none"> <li>• Contributions to foundations and non-profit entities.</li> </ul>	GRI 3-3	6.1 The company's sustainable development commitments



Contents of Spanish Law 11/2018 on Non-Financial Information Statements		Standard used	Section of the report
Information on the company			
Policies	<ul style="list-style-type: none"> <li>• Management approach.</li> </ul>	GRI 3-3	6.1 The company's sustainable development commitments
Risk	<ul style="list-style-type: none"> <li>• Material topics.</li> </ul>	GRI 3-2	6.1 The company's sustainable development commitments
The company's sustainable development commitments	<ul style="list-style-type: none"> <li>• Impact of the company's activity on employment and local development.</li> </ul>	GRI 2-6, GRI 3-3	6.1 The company's sustainable development commitments
	<ul style="list-style-type: none"> <li>• Impact of the company's activity on local populations and the territory.</li> </ul>		
	<ul style="list-style-type: none"> <li>• Relationships with local communities.</li> </ul>	GRI 2-29	6.1 The company's sustainable development commitments
	<ul style="list-style-type: none"> <li>• Association or sponsorship actions.</li> </ul>	GRI 2-28	6.1 The company's sustainable development commitments
Subcontracting and suppliers	<ul style="list-style-type: none"> <li>• Inclusion of ESG matters in the purchasing policy.</li> </ul>	GRI 3-3, GRI 308-1, GRI 414-1	6.2 Subcontracting and suppliers
	<ul style="list-style-type: none"> <li>• Consideration of social and environmental responsibilities in supplier and subcontractor relationships.</li> </ul>		6.2 Subcontracting and suppliers
	<ul style="list-style-type: none"> <li>• Supervisory systems, audits and audit findings.</li> </ul>		6.2 Subcontracting and suppliers

# NON-FINANCIAL INFORMATION STATEMENT

Contents of Spanish Law 11/2018 on Non-Financial Information Statements		Standard used	Section of the report
Information on the company (cont.)			
Consumers	• Consumer health and safety measures.	GRI 3-3	6.3 Consumers
	• Complaint management system.	GRI 3-3	6.3 Consumers
Tax information	• Profit/loss by country.	GRI 207-4	Note 24 to the consolidated financial statements of Corporación Financiera Alba, S.A. and Subsidiaries for 2022.
	• Income tax paid.		
	• Government grants received.	GRI 201-4	In 2022 grants amounting to EUR 53,574 were received from the authorities.
EU taxonomy	• EU taxonomy key performance indicators for non-financial entities: % of turnover, CapEx and OpEx associated with taxonomy-eligible economic activities.	n.a.	7. EU taxonomy for sustainable investment





# NON-FINANCIAL INFORMATION STATEMENT

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INDEPENDENT LIMITED  
ASSURANCE REPORT ON  
THE CONSOLIDATED  
NON-FINANCIAL  
STATEMENT

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## **Corporación Financiera Alba, S.A. y Sociedades Dependientes**

Independent limited assurance report  
on the Consolidated Non-Financial  
Statement for the fiscal year ended 31  
December 2022.

Translation of a report originally issued in Spanish. In the  
event of a discrepancy, the Spanish-language version  
prevails.



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Translation of a report originally issued in Spanish. In the event of a discrepancy, the Spanish-language version prevails

## INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL STATEMENT FOR THE FISCAL YEAR ENDED 31 DECEMBER 2022.

To the shareholders of Corporación Financiera Alba, S.A.:

In accordance with Article 49 of the Spanish Commercial Code, we have performed the verification, with a scope of limited assurance, of the Non-Financial Information Statement (NFIS) for the fiscal year ended 31 December 2022 of Corporación Financiera Alba, S.A. and subsidiaries ("Corporación Financiera Alba"), which forms part of Consolidated Directors' Report of Corporación Financiera Alba.

The NFIS includes information, additional to that required by current Spanish corporate legislation relating to non-financial, that has not been the subject of our verification work. Accordingly, our work has been limited exclusively to the verification of the information identified in the section 8 "Non-Financial Information Statement Table of contents" on the NFIS.

### Responsibilities of the Shareholders and the Directors

The preparation and content of the NFIS are the responsibility of the Directors of Corporación Financiera Alba. The NFIS was prepared in accordance with the content specified in current Spanish corporate legislation and following the criteria of the Sustainability Reporting Standards de Global Reporting Initiative (GRI standards) selected, as well as other criteria according to the mention for each matter in the section 8 "Non-Financial Information Statement Table of contents" on the NFIS.

This responsibility also includes the design, implementation and maintenance of such internal control as is determined to be necessary to enable the NFIS to be free from material misstatement, whether due to fraud or error.

The Directors of Corporación Financiera Alba are also responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the NFIS is obtained.

### Our Independence and Quality Control

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA), which is based on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior.

Our firm applies International Standard on Quality Control 1 (ISQC 1) and, accordingly, maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our engagement team consisted of professionals who are experts in reviews of non-financial information and, specifically, in information about economic, social and environmental performance.

Deloitte, S.L. inscrita en el Registro Mercantil de Madrid, tomo 13.650, sección 8ª, folio 188, hoja M-54414, inscripción 96ª. C.I.F.: B-79104469.  
Domicilio social: Plaza Pablo Ruiz Picasso, 1, Torre Picasso, 28020, Madrid.

# NON-FINANCIAL INFORMATION STATEMENT

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## Our responsibility

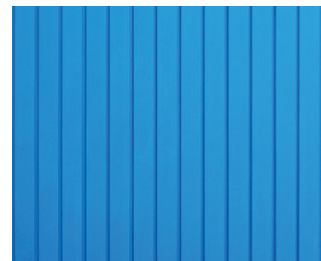
Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed, which relates exclusively to the financial year 2022.

We conducted our review in accordance with the requirements established in International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements other than Audits or Reviews of Historical Financial Information, currently in force, issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the guidelines published by the Spanish Institute of Certified Public Accountants on attestation engagements on regarding non-financial information statements.

The procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement and, consequently, the level of assurance provided is also lower.

Our work consisted in requesting information from management and the various units of Corporación Financiera Alba that participated in the preparation of the NFIS, reviewing the processes used to compile and validate the information presented in the NFIS, and carrying out the following analytical procedures and sample-based review tests:

- Meetings held with Corporación Financiera Alba personnel to ascertain the business model, policies and management approaches applied, and the main risks relating to these matters, and to obtain the information required for the external verification.
- Analysis of the scope, relevance and completeness of the contents included in 2021 NFIS according to the business, sector and nature of Corporación Financiera Alba's operations, considering the contents required by the mercantile regulations in force.
- Analysis of the processes used to compile and validate the data presented in the 2021 NFIS.
- Review of the information relating to risks and the policies and management approaches applied in relation to the material matters described in the NFIS of 2022.
- Verification, by means of sample-based review tests, of the information relating to the contents identified in the NFIS of 2022 and the appropriate compilation thereof based on the data furnished by the information sources.
- Obtainment of a representation letter from the directors and management.



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#### Emphasis Paragraph

Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020 on the establishment of a framework to facilitate sustainable investments establishes the obligation to disclose information on the manner and extent to which the company's activities are associated with economic activities aligned in relation to the objectives of climate change mitigation and adaptation to climate change for the first time for fiscal year 2022, in addition to the information referring to eligible activities required in fiscal year 2021. Consequently, in the attached NFIS comparative alignment information has not been included. On the other hand, to the extent that the information referring to eligible activities in fiscal year 2021 was not required with the same level of detail as in fiscal year 2022, in the attached NFIS the detailed information regarding eligibility is not strictly comparable either. Additionally, it should be noted that the administrators of Corporación Financiera Alba have incorporated information on the criteria that, in their opinion, best allow compliance with the aforementioned obligations and that are defined in section 7. Sustainable Finance Taxonomy of the attached NFIS. Our conclusion has not been modified in relation to this issue.

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#### Conclusion

Based on the procedures performed and the evidence obtained, no aspect has been revealed that makes us believe that the NFIS corresponding to the annual year ended on December 31 of 2022 has not been prepared, in all its significant aspects, in accordance with the contents contained in current commercial regulations and following the criteria of the GRI standards selected, as well as those other criteria described according to what is mentioned for each subject in the section 8 "Non-Financial Information Statement Table of contents" on the NFIS.

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#### Use and distribution

This report has been prepared in response to the requirement established in the commercial regulations in force in Spain, so it may not be suitable for other purposes and jurisdictions.

Ángel García Arauna



DELOITTE, S.L.

April 25<sup>th</sup>, 2023