

CORPORACIÓN FINANCIERA ALBA, S.A. and Subsidiaries

NON-FINANCIAL INFORMATION STATEMENT FOR THE YEAR ENDED 31 DECEMBER 2020

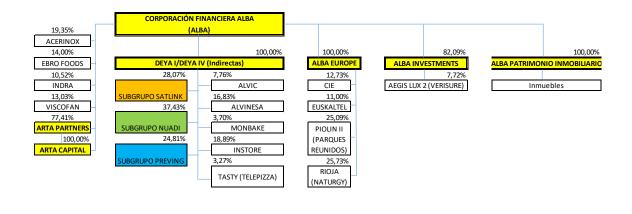


1. Introduction

This non-financial information statement, which forms part of the Alba Group's consolidated directors' report, 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. ("Alba") is an investment company holding significant ownership interests in various listed and unlisted companies with activities in diverse economic sectors. It also holds interests in companies through venture capital activities.

The organisation chart of the Alba Group is as follows:



Alba and its Group: Corporación Financiera Alba, S.A., Deyá Capital SCR, S.A., Deyá Capital IV, SCR, S.A., Alba Europe, Sàrl., Alba Investments, Sàrl., Alba Patrimonio Inmobiliario, S.A., Artá Partners, S.A. and Artá Capital SGEIC, S.A.

The scope of this non-financial information statement includes the Alba Group's activities, and the activities of the Satlink, Nuadi and Preving subgroups (its subsidiaries).

It was prepared using the most up-to-date version of the internationally recognised Global Reporting Initiative (GRI) Sustainability Reporting Guidelines, i.e. the 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 the Alba Group. The main relevant matters identified were, therefore, as follows:

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



• Energy efficiency and environmental management

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.

2. Business model

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 venture capital.

Alba, whose objective is to create value for its shareholders in the long term, has an Investment Policy that establishes a responsible investment philosophy based on a set of principles and criteria for carrying on its business activity.

One of these 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. For this purpose, it engages external advisory services whenever necessary.

As regards the geographical sphere of its operations, the need to diversify risk has led the Group 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.

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

The **Preving** subgroup has an 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 to adapt the working environment to people.
- Occupational safety plans aimed at reducing or eliminating risks that could cause work-related injuries or ill health.



- Industrial Hygiene, an activity that involves the prevention of physical, chemical and biological risks that might arise in the working environment.
- Health Surveillance, which is one of the instruments employed in Occupational Healthcare to monitor the consequences of working conditions on the health of workers.
- Applied psychosociology: prevention of psychosocial risks defined as those resulting from the interactions between the organisational characteristics of the work and the capabilities, needs and expectations of the workers.
- Occupational Health Promotion (OHP): advisory services relating to strategies to prevent occupational risks and increase the ability of workers to maintain their health and quality of life.
- Business Activity Coordination (BAC), through advisory services for fulfilment of obligations in this area.

The main activity of the **Nuadi** subgroup is 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 mainly at the spare parts market, which accounts for 94% of its total production. The remaining 6% relates to the original equipment and original replacement parts market.

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.

3. Information on social- and personnel-related matters

3.1. Policies

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 the sustainability of companies. 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. The Alba Group'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 indirectly, at all of its investees and subsidiaries, as well as by the promotion of good human resources-related practices.

Also, in 2020 the Alba Group's companies adapted to the scenarios resulting from the covid-19 pandemic, with specific measures being taken at each of them to guarantee the



minimisation of the impact of the pandemic on the workforce, both in terms of the levels of employment and in order to maintain the health and safety of their professionals.

Consequently, Alba adopted all the measures required to ensure that employees were able to comply with the health measures and mobility restrictions imposed by the competent authorities, through the preparation of a covid-19 action protocol, which has been regularly updated. The main measure was the implementation of remote working.

In the case of the **Satlink** subgroup, in view of the connection of its business with fisheries, its business activity was deemed to be necessary during the pandemic, which allowed it to continue operating with the compulsory safety measures and the restrictions imposed by the public authorities. The maintenance of this subgroup's level of activity made it possible to avoid furlough-type arrangements and dismissals caused by covid-19.

The **Nuadi and Preving** subgroups, for their part, centred their efforts in 2020 on public health and on the wellbeing of the society and communities in which they operate, through the implementation of specific measures to protect their workers.

3.2. Corporate management and performance

3.2.1. Employment and remuneration

Since it is 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 with 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 1,717 employees in Spain at 2020 year-end. More than 86% of the employees have permanent contracts. The detail of the workforce at year-end, including the employees of Alba and its subsidiaries in Spain (the Alba Group), is as follows.

	Detail of v	gender		
	Men	<u>Women</u>	<u>Total</u> <u>2020</u>	<u>Total</u> <u>2019</u>
Permanent Contract	742	741	1,483	1,402
Temporary Contract	112	122	234	160
Total	854	863	1,717	1,562
Full-Time	739	585	1,324	1,180
Part-Time	115	278	393	382
Total	854	863	1,717	1,562
Average remuneration	36,975	23,844		
Number of dismissals	18	13	31	7



	Detail of workforce by age				
	<u>< 35 years</u> <u>old</u>	<u>35-50 years</u> <u>old</u>	<u>> 50 years old</u>	<u>Total</u> <u>2020</u>	<u>Total 2019</u>
Permanent Contract	154	1,006	323	1,483	1,402
Temporary Contract	68	131	35	234	160
Total	222	1,137	358	1,717	1,562
Full-Time	190	856	278	1,324	1,180
Part-Time	32	281	80	393	382
Total	222	1,137	358	1,717	1,562
Average remuneration	22,330	28,653	40,833		
Number of dismissals	5	22	4	31	7

Detail of workforce by professional category

	<u>Factory</u> <u>Workers and</u> <u>Clerical Staff</u>	<u>Middle</u> <u>Management</u>	<u>Executives</u>	<u>Total</u> <u>2020</u>	<u>Total 2019</u>
Permanent Contract	1,368	84	31	1,483	1,402
Temporary Contract	233	1	-	234	160
Total	1,601	85	31	1,717	1,562
Full-Time	1,215	79	30	1,324	1,180
Part-Time	386	6	1	393	382
Total	1,601	85	31	1,717	1,562
Average remuneration	25,160	81,017	228,642		
Number of dismissals	30	1	0	31	7

Employees with a disability

	<u>Total 2020</u>	<u>Total 2019</u>
Number of employees with disabilities at year- end	15	17



Also, the Satlink and Nuadi subgroups have workers who perform their activities in other countries, all of whom have indefinite-term full-time contracts, the detail being as follows:

	Men	Women	<u>Total 2020</u>
China	23	23	46
Ecuador	4	2	6
Korea	3	3	6
Seychelles	2	0	2
Fiji	2	1	3
Taiwan	3	0	3
Total	37	29	66

	<u>< 35 years</u> <u>old</u>	<u>35-50 years</u> <u>old</u>	<u>> 50 years</u> <u>old</u>	<u>Total 2020</u>
China	11	34	1	46
Ecuador	4	1	1	6
Korea	2	4	0	6
Seychelles	1	1	0	2
Fiji	3	0	0	3
Taiwan	2	0	1	3
Total	23	40	3	66

	<u>Factory</u> <u>Workers and</u> <u>Clerical Staff</u>	<u>Middle</u> <u>Management</u>	<u>Executives</u>	<u>Total 2020</u>
China	36	8	2	46
Ecuador	5	1	0	6
Korea	5	1	0	6
Seychelles	2	0	0	2
Fiji	2	1	0	3
Taiwan	2	1	0	3
Total	52	12	2	66

Both **Alba** and its subsidiaries are committed to maintaining a remuneration model for their employees that guarantees effective application of the principle of equal pay for work of equal value, as well as to the non-existence of salary differences due to gender or on any other discriminatory grounds, and they base the distribution of remuneration on



salary brackets according to the level of responsibility, the type of work, alignment with market remuneration for positions with the same conditions, and taking into account the sustainability of the company 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. In carrying out the pay-gap exercise Alba included the data on its subsidiaries in Spain in order to encompass the remuneration received by all employees at the consolidated Group, and obtained a gross figure of 35.5%. This difference is due to the high percentage of men with long service records at the Parent in senior positions, and to the large number of technical and administrative positions held by women. As mentioned above, the remuneration models applied do not discriminate on the basis of gender; however, Alba is working to correct these differences through the effective application of the principle of equality.

3.2.2. Organisation of the work

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.

In 2020, Alba did not have to adopt any measures in relation to furlough-type arrangements. Throughout the year, and in accordance with the various measures imposed or recommended by the authorities, employees were encouraged to organise their departments in such a way as to favour the work-life balance, with reduced attendance in person and, during lockdown, the performance of activities exclusively through remote working.

Alba's subsidiaries also have specific work-life balance and flexibility measures in place, which are adapted to the characteristics of each company. In 2020, as a result of the circumstances of the pandemic, these measures were strengthened at the subsidiaries, through the implementation of measures such as remote working for those positions and functions where it was possible and the reorganisation of working hours to avoid crowds of employees entering or leaving the workplace, the aim being to safeguard employee health and the health of their families, and to promote the work-life balance.

At the **Preving** subgroup, work-life balance policies 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 this type of policies, the companies of the Preving subgroup received awards such as the *Sello Reconcilia* from the Association of Female Entrepreneurs and Executives of Navarre (AMEDNA) or the *Premio a la Conciliación* from the Alcobendas City Council. Furthermore, the main measure taken in the context of the pandemic was the reorganisation of positions for remote working, where this was possible, through the implementation of the remote working (TAD) mechanism allowing 20% of annual working hours to be completed remotely.

At the **Nuadi** subgroup, a specific working-time reorganisation protocol was established as result of the pandemic, which includes both covid-19-related safety and prevention



measures and shift flexibility measures to facilitate the work-life balance and reduce, for health reasons, the number of employees coinciding at the workplace. A remote working protocol was also established for those employees whose functions allowed it.

The organisation of working hours at the **Satlink** subgroup is determined on the basis of the applicable collective agreement and, in addition, promotes appropriate flexibility in terms of entry and exit times. Measures are also promoted to foster detachment from work and to enable employees to balance their personal lives with their professional development at the company. In this connection, over the course of the pandemic and due to the widespread implementation of remote working for employees whose functions allow it, special emphasis has been placed on the importance of employee rest between working days, through the promotion of flexibility as an element that benefits performance quality.

	Total 2020	Total 2019
Number of hours of absenteeism recorded in	213,068	
the year for all employees*	213,008	124,136

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

The figure for absenteeism in 2020 increased exponentially due to the impact of covid-19 on the employees, and to the absences related to the circumstances surrounding the evolution of the pandemic.

3.2.3. Health and safety

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.

In 2020, as a result of the covid-19 pandemic, this area became especially important to the Alba Group's business activities, and was managed by each subgroup in accordance with the specific requirements and nature of their activities.

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. In 2020, safeguarding the health and safety of employees was of paramount importance. A few days before the declaration of the state of emergency on 14 March 2020, remote working was imposed and the offices were disinfected as a preventive measure. Face-to-face activities did not resume until the end of May and were very limited in scope, with employees coming into the office no more than two days per week, and only in the mornings, with shifts to restrict face-to-face activity still further. Face-to-face activity was only fully resumed in the mornings from September onwards, still in conjunction with flexible timetables and shifts to ensure that employees were not all in the offices at the same time. At year-end, in view of the increase in rates of infection, office attendance was reduced once more. The return to work in May and September took place after all the employees were given PCR and serological tests at the company's expense.

In order to promote remote working, employees were equipped with the devices and applications required to do so. The following measures were adopted at Alba's offices: fitting-out of workstations to comply with the appropriate distances between people, and attendance in shifts; installation of the elements required in common areas and toilets to



avoid touching surfaces; adaptation of windows to ventilate spaces; provision of masks and hand sanitiser to employees and measurement of employees' temperatures; restricting the access of external persons to the offices; holding of internal and external meetings remotely. The covid-19 action protocol is available on the company's Intranet.

The rules prescribed by the building in which Alba's offices are located were also followed. These rules, which affect Alba employees directly, include deactivating the digital fingerprint for lift access and increasing the HVAC levels to improve air renewal throughout the building.

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 ISO 45001. In relation to the pandemic situation beginning in March 2020, the Preving subgroup followed the guidelines for the prevention of infection and the protection of workers set by the health authorities at all times, and sought to safeguard the health of its employees in this regard. 2020 brought the sad news of the death of a Preving subgroup employee in an accident on the way to work.

The **Nuadi** subgroup has an Occupational Risk Prevention Management System the objective of which is to ensure compliance with its Health and Safety policy and the integration of preventive activities in all aspects of management and at every hierarchical level. In the framework of this system, a unified protocol was created for the company in response to the pandemic, which regulates the health and safety measures to be taken into account before, during and after work, including measures to prevent infection at workspace entrances and exits, when travelling or in common areas, and ergonomic and psychosocial measures for the correct adaptation of workers to remote working.

In the case of the **Satlink** subgroup, prevention measures were aligned with the health recommendations made by the Government and adapted to the nature of its activity. Therefore, in addition to the hygiene and infection prevention measures, PCR and antigen tests were conducted and extended to all personnel, both those returning to face-to-face activities, and those on secondment or attending essential meetings in person. In addition, workstations were redistributed by area, department and working hours, and internal measures were taken in line with the evolution of the infection rate in each geographical region.

Health and Safety Indicators	Men	Women
Frequency rate ¹	11.25	16.54
Severity rate ²	3.86	10.62
Occupational ill health	0	0
Number of deaths	1	0

¹ Frequency Rate: Number of work-related injuries with days away from work x 1,000,000/Total number of hours actually worked

²Severity Rate: Number of days not worked due to work-related injury x 1,000/Total number of hours actually worked



3.2.4. Labour Relations

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:

- For Alba, the Madrid 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 **Satlink**, the Collective Agreements for the Metal Trade in the Madrid Autonomous Community and Pontevedra, and the National Collective Agreement for Engineering Companies and Technical Studios.

In those companies in which it is applicable, there are Works Councils and/or trade union representatives who oversee compliance with the principles established in the applicable agreements and ensure the establishment of fluid lines of communication between all the workers and the relevant company bodies. In total, 88% of the employees of Alba and its subsidiaries in Spain (the Alba Group) are covered by collective agreements.

3.2.5. Training

Alba's training procedures are adapted to employees' needs and take into account the characteristics of the functions they perform, their careers and their professional development, so that resources are focused on the requirements of each position and the current market. In 2020, since employees were provided with the appropriate devices, they were able to access the training they required remotely.

The **Satlink** subgroup has a policy relating to Occupational Risk Prevention training for work performed on board ships, and to technical training 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 by the company.

Detail, by professional category, of total number of hours of training provided to employees:

	Factory Workers and Clerical Staff	Middle Management	Executives	Total
Hours of training 2020	40,791	483.8	299.80	41,816
Hours of training 2019	6,241	810	342	7,393

Of note in 2020 was the improvement in the systems for collecting information on training days at the companies making up the Alba Group, which gave rise to an exponential



increase in the number of hours of training recorded, which was also due to the enhanced monitoring of these data given the digital nature of the activities carried on as a consequence of covid-19.

3.2.6. Accessibility and equality

Alba's Code of Ethics and Conduct includes principles of non-discrimination and equal opportunity with which it aims to fulfil the commitment to create a working environment in which all employees enjoy fair treatment, respect and dignity, while rejecting any form of violence or harassment, abuse of authority or any other conduct that violates the rights of workers and people. Also, when holding general meetings, Alba facilitates the accessibility of people with disabilities and the elderly, both in terms of providing access to prior information and in making it easier for them to cast their vote, access the meeting room and follow the meetings.

In addition, pursuant to the regulations governing general meetings, in order to safeguard the general interests and health of shareholders and people involved in the preparation and holding of the general meeting, the meeting was held entirely remotely in 2020.

In addition to the measures ensuring regulatory compliance in the area of accessibility and equality, other measures included most notably those taken at the **Preving** subgroup, where 95% of its facilities have measures in place to improve accessibility for workers (elimination of steps or adapted washroom facilities). In relation to product and service accessibility, Preving has training materials adapted to the needs of workers (audio material for visually impaired workers, graphical documentation for the hearing impaired and training material in sign language).

4. Information on environmental matters

4.1. Policies

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. In 2020, for the purpose of including the amendments introduced in the Code of Good Governance for Listed Companies by a resolution of the Spanish National Securities Market Commission (CNMV) on 26 June 2020, Alba replaced its Corporate Social Responsibility Policy with a new Sustainability Policy. The policy approved continues to evidence 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, the Alba Group'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 from an environmental perspective.

For its part, **Nuadi** has a department dedicated solely to environmental issues and has in place an ISO 14001-certified environmental management system. This subgroup also takes out third-party liability insurance providing warranty coverage for any type of environmental incident.

The **Preving** subgroup also 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.

In addition, the **Satlink** subgroup acknowledges its role in the challenge posed by climate change and, to this end, 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 its modus operandi, but also with regard to its internal management processes, the training provided to employees of the companies in the Satlink subgroup and the subgroup's image. Company 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 has a quality system in place in compliance with the UNE-EN-ISO 9001 and UNE-EN 9100 standards.

4.2. Environmental management and performance

4.2.1. Energy and climate change

At **Alba** energy consumption refers basically to the use of lighting and HVAC systems, and computer hardware in the offices and buildings owned by it. To reduce consumption in this connection, various different energy efficiency measures have been adopted, such as replacing traditional incandescent light bulbs with LEDs, carrying our refurbishment work in buildings to increase energy efficiency and conducting external energy efficiency controls and audits, all of which help the Alba Group to reduce its impact on the environment. In 2020, the company underwent a process to obtain sustainability certification for its building at Castellana 89, which culminated in January 2021 with the award of the LEED Gold Seal by the US Green Building Council (USGB).

At Alba, the emissions generated also arise from use of vehicles in the company's own fleet. With a view to reducing these emissions and its carbon footprint, Alba replaces its petrol or diesel-driven vehicles with electric or hybrid models.

The **Preving** subgroup uses electricity as a natural resource when engaging in its activities at its facilities and, accordingly, in order to optimise its use the subgroup encourages its employees to adopt specific measures to avoid unnecessary power consumption, and it has conducted an energy audit at its centres in Andalusia, Extremadura and Madrid with the aim of achieving greater energy efficiency.

In the case of the industrial installations of the **Nuadi** subgroup, energy consumption reduction measures have been implemented based on the scheduling of statutory servicing and energy inspections of boilers and coolers, and the conduct of energy audits.

As regards the **Satlink** subgroup, following its expansion into new offices in 2020, a zone-by-zone heating and air conditioning system has been installed using 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 assigned with environmental responsibility 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, the latest development in this connection being the 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_2 emissions.

Energy consumption within the organisation

	Total 2019	Total 2020*
Electricity consumption (MWh)	7,986.35	6,634.29
Natural gas consumption (MWh)	3,739.14	3,819.85
Diesel consumption (litres)	136,774.00	355,589.59

*Note: The result for 2020 includes the scope of the figures of the companies in the Satlink subgroup which operate outside Spain.

The increase in diesel consumption is due to an improvement in data gathering and to an increase in the consumption of this type of fuel by the Preving subgroup as a result of the journeys required during the reporting period.

ScopeTotal 2019Total 2020*Scope 11,100.021,829.81Scope 23,274.401,260.52Total4,374.433,090.32

Greenhouse gas emissions (t CO₂ eq.)

*Note: The result for 2020 includes the scope of the figures of the companies in the Satlink subgroup which operate outside Spain.

4.2.2. Sustainable use of resources and circular economy

Alba has adopted a series of measures which, as stated above, aim to improve efficiency and its 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, Alba has a digital archive for all its departments that enables consultation, download and sharing of files with minimum paper consumption. Moreover, all the paper used is Forest Stewardship Council (FSC) certified. The efforts made to maximise the use of remote working solutions and the reduction of the physical presence of employees at offices as a result of the covid-19 pandemic led to a decrease in paper consumption in 2020.

The main materials used in the **Preving** subgroup relate to the healthcare consumables used to perform medical check-ups. However, one of the resources used the most in the subgroup's offices is paper; therefore, rationalising its use and reducing its consumption constitute one of the main objectives pursued. 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 is steel, in coils of varying sizes, and the metal scrap arising as a result of the manufacturing process is sent to a metal waste manager. Steel is the raw material used the most by the subgroup's companies and in 2020 consumption amounted to 18,683 tonnes. The optimisation of water consumption is envisaged in the phases of the established Waste



Reduction plan that include proposals for improvement at the main sources of water discharges. The launch of one of the main phases is scheduled for 2021 and, as a result, the companies will be able to substantially reduce their water consumption and the associated discharges.

Lastly, 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.

Consumption of materials

	Total 2019	Total 2020*
Sanitary water consumption (m^3)	46,415.00	31,064.41
Paper consumption (kg)	31,577.50	21,378.44

*Note: The result for 2020 includes the scope of the figures of the companies in the Satlink subgroup which operate outside Spain.

Alba continues to implement specific measures to reduce waste generation and ensure proper waste treatment and management at each of its subsidiaries. Alba's offices use water fountains, and each employee has a glass bottle to avoid the use of single-use 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. In 2020, due to the pandemic, remote working was prioritised and office attendance was limited, giving rise to a reduction in the waste generated in the offices.

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

Roll-out of the Waste Reduction Plan prepared by the **Nuadi** subgroup commenced in 2020. The subgroup's main source of waste is the scrap metal arising as a result of the manufacturing process. Steel, in coils of varying sizes, is Nuadi's incoming raw material and, following the manufacturing process, the metal scrap is sent to a metal waste manager. 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 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 Corporación Financiera Alba and its subsidiaries is as follows:



Waste generated - Alba Group

Type of waste	Total 2019	Total 2020*
Hazardous (tonnes)	323.66	334.05
Non-hazardous (tonnes)	9,039.43	7,135.00
Total	9,363.09	7,469.00

*Note: The result for 2020 includes the scope of the figures of the companies in the Satlink subgroup which operate outside Spain.

5. Ethics, human rights and combating corruption

5.1. Ethical behaviour and respect for human rights:

Alba's Code of Ethics and Conduct includes the values and principles that must govern its conduct and which are extended to all those individuals who, in the discharge of their duties, or in their labour, professional or commercial relations, have dealings with the Alba Group. These values include most notably:

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

Alba's Code of Ethics and Conduct includes principles of non-discrimination and equal opportunity with which it aims to fulfil the commitment to create a working environment in which all employees enjoy fair treatment, respect and dignity, while rejecting any form of violence or harassment, abuse of authority or any other conduct that violates the rights of workers and people. Also, when holding general meetings, Alba facilitates the accessibility of people with disabilities and the elderly, both in terms of providing access to prior information and in making it easier for them to cast their vote, access the meeting room and follow the meetings.

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

In view of the importance being attached to internal whistleblowing channels, a more detailed procedure for processing reports was established; this procedure facilitates communication, in a confidential manner, 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 suppliers, contractors and cooperating entities.

Each year Alba reminds the persons subject to the Code of Ethics and Conduct that it remains in force. The communication sent in 2020 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. In 2020, in accordance with the recommendations introduced in the Code of Good Governance for Listed Companies by a resolution of the Spanish National Securities Market Commission (CNMV) on 26 June 2020, the circumstances in which anonymous reports are permissible were included in the Whistleblowing Channel regulated by the Code of Ethics and Conduct.

No reports, suggestions or consultations relating to the Code of Ethics and Conduct were received in 2020.

In its Code of Conduct the **Preving** 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.

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 the persons who form part of the entity and for the third parties related to it at any given time, based on ongoing observance of human rights and the regulations established in each case.

The Code of Ethics of the **Satlink** subgroup explicitly states, in its general rules of conduct, 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 with regard to the mitigation of that practice or the denunciation of any parties that might be involved. This includes personnel, customers and suppliers alike.

5.2. Combating corruption and bribery

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 persons 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.

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, handouts, invitations and other types of remuneration, establishes specific guidelines which tend to limit and, in certain cases, prohibit gifts and invitations made or received by professionals of the subgroup.

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.

6. Information on the company

6.1. The company's sustainable development commitments

In 2020, **Alba** replaced its Corporate Social Responsibility Policy with the Sustainability Policy. This policy 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 Sustainability Policy is founded on applying three principles to its investments:

- 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 good governance-related risks.

Other noteworthy general principles and guidelines of conduct at Alba include the quest for excellence and the adoption of best corporate governance 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, establishing 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 subgroups. 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 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 Initiative, Alba also participates in the training activities organised by this platform and submits the required Communication on Progress report. In 2020 Alba attended three meetings at which sustainable development-related issues were addressed.

In addition, with the aim of helping those who are suffering most from the serious economic and social impact of covid-19, Alba has participated, together with other companies, public authorities and social welfare agencies, in the "Súmate, Operación Solidaria" (SOS) initiative, which has made it possible to respond to the basic needs of vulnerable groups. Alba made a cash donation of EUR 50,000 to the Food Bank.

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.

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

In addition to its cash contribution to Emisores Españoles, in 2020 Alba made economic contributions to Fundación Instituto Juan March de Estudios e Investigaciones and to Fundación de Estudios de Economía Aplicada (FEDEA) totalling EUR 356,000.

The **Preving** subgroup participates in social organisations in the areas in which it has a presence, through the sponsorship of sports activities and collaboration with chambers of commerce, associations of labour and social security practitioners, teams and talented individuals, brotherhoods and other societies, business associations, stakeholders and professional associations. The subgroup has entered into agreements with organisations that promote employment of groups with specific needs, and work-experience agreements with the most important educational institutions in the areas in which it operates, such as IESE, various universities and "dual" training centres (combining traditional lessons with training in-situ at companies). Preving also participates regularly in social events that contribute value to society; the most noteworthy in 2020 included the projects with Agora, El Cluster del Conocimiento, the engineers' association, Asociación Aedipe Centro and Fundación Primera Fila. In 2020 Preving made contributions to foundations and non-profit entities totalling EUR 105,000.

The **Satlink** subgroup demonstrates its commitment to Alba's corporate social responsibility principles by actively and voluntarily promoting and contributing to social and economic development. Given the social and economic impact of the subgroup due to the nature of its activities in local communities, one of the main values and principles of Satlink's business project is to ensure the social inclusion of groups with particular difficulties in gaining access to employment, and the integration in the labour market of people with disabilities and groups at risk of social exclusion. To this end, a portion of its initiatives focus on local recruitment in the geographical areas in which its operates, i.e., in Spanish coastal areas (Vigo, Vizcaya), and through its foreign subsidiaries (Manta in Ecuador, Fiji and the Seychelles).

Satlink's participation in associations and sponsorships is also worthy of mention. In 2020, Satlink became involved with the Spanish Fisheries Confederation (CEPESCA),



the Bermeo Tuna World Capital (BTWC) association, the Organisation of Producers of Frozen Tuna (OPAGAC), Infofish and the Bermeo Rowing association. It is also actively involved in the World Wildlife Fund, Tierra Creativa, Atuna, Sociedad Geográfica, Orpagu and Opromar. In 2020 Satlink made contributions totalling EUR 74,791.

In 2020 the **Nuadi** subgroup focused its efforts on public health and the well-being of society and the communities in which it operates. In the course of the covid-19 pandemic, Nuadi has donated a large quantity of masks and protective equipment to various public entities in order to collaborate with the local communities in preventing and minimising the spread of covid-19.

6.2. Subcontracting and suppliers

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, the agreements and the terms and conditions established in the relationships managed with each of these third parties clearly evidence their commitment to observe and comply with Alba's principles of respect for human rights, the environment and regulatory compliance.

The **Preving** subgroup engages local suppliers and has a Compliance Agreement which governs its relationships with suppliers and how they are managed by subgroup personnel, thus ensuring compliance with the principles and values established by the company in its Code of Ethics and Conduct. Preving currently has Corporate Responsibility certification.

The **Nuadi** subgroup has an internal procurement procedure in place for the suppliers affecting its product and manufacturing process. Each supplier's performance and associated risk is assessed annually, through a system of regular audits based on the German Automotive Industry Association (VDA) standard, and suppliers that are proactive in identifying the impacts of environmental issues and in achieving the goals established are viewed positively.

Lastly, 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, Satlink's Code of Ethics explicitly states, in its general rules of conduct, the company's commitment to gender equality policies and environmental guidelines, with regard to both their definition and the principles of action for its stakeholders, including its suppliers. In its Code, Satlink underlines its adherence and commitment to the United Nations Global Compact and to the declarations of the International Labour Organisation.

6.3. Consumers

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 and provides all the resources required to coordinate business activities in the buildings owned by it. 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 and seamless relationship is maintained with tenants.

In 2020, within the context of the covid-19 pandemic, Alba adopted all the measures required in the buildings owned by it to enable it to conduct its activities in those buildings in accordance with the health authority recommendations, and it acted with the utmost prudence in order to safeguard users' health and safety. Thus, a series of action protocols have been put in place, some of which can be accessed using the QR codes in the buildings themselves or can be found on Alba's corporate website. These protocols relate to the movement of people within the buildings, and regulate user access and the use of lifts, as well as implementing temperature checks on access to the buildings. They also consider the hygiene measures adopted: use of a mask and hydroalcoholic hand sanitiser gel, dividing screens at reception, more intense and more frequent cleaning, among others. Lastly, the protocols provide recommendations that are in line with the instructions and prevention measures issued by the public health authorities.

The **Preving** subgroup has specific measures in place to guarantee the health and safety of the customers of the services offered; there is a complaint management system on the intranet that is accessible to all employees and through which they must 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.

Compliance with the occupational risk prevention legislation is also a priority for Preving, and it conducts strict monitoring and control of the related preventive planning. 2020 saw the adaptation of training rooms and furniture in health surveillance offices to meet ergonomic requirements, as well as to ensure appropriate ambient temperature and relative humidity conditions for both external and internal clients. 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 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.

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.



7. Table of Contents of Non-Financial Statements

Contents of the Statements	Law 11/2018 on Non-Financial Information	Standard employed	Section of the Report
Business Model			
Description of the Group's business model	 Description of the business model. Geographical presence. Objectives and strategies. Main factors and trends affecting future development. 	GRI 102-2, GRI 102-4, GRI 102-6, GRI 102-7, GRI 102-15	2. Business Model
Main risks	 Main risks and impacts derived from Group activities, and how they are handled. 	GRI 102-11, GRI 102-15	2. Business Model
Information regar	ding environmental issues		
Policies	 Management focus. 	GRI 103-2, GRI 103-3	4.1 Information on environmental matters - Policies
General	- Effects of company activities on the environment, health and safety.	GRI 102-15, GRI 102-29, GRI 102-31	4.1 Information on environmental matters - Policies
	 Environmental certification or evaluation procedures. 	GRI 102-11, GRI 102-29, GRI 102-30	4.1 Information on environmental matters - Policies
	 Resources dedicated to environmental risk prevention. 	GRI 102-29	4.1 Information on environmental matters - Policies
	 Application of the principle of foresight. 	GRI 102-11	4.1 Information on environmental matters - Policies
	 Provisions and guarantees for environmental risks. 	GRI 307-1	Note 1 on the Consolidated Annual Accounts of Corporación Financiera Alba, S.A. and Subsidiaries for the financial year 2020
Pollution	- Measures to prevent pollution.	GRI 103-2, GRI 302-4, GRI 302-5, GRI 305-5, GRI 305-7	4.2.1 Energy and Climate Change
Circular economy and prevention and management of waste	 Measures to prevent and manage waste. 	GRI 103-2, GRI 301-1, GRI 303-3, GRI 306-2	4.2.2 Sustainable use of resources and circular economy



Contents of the Statements	Law 11/2018 on Non-Financial Information	Standard employed	Section of the Report
Sustainable use of resources	– Water consumption.	GRI 303-3	4.2.2 Sustainable use of resources and circular economy
	- Raw materials consumption.	GRI 301-1	4.2.2 Sustainable use of resources and circular economy
	 Direct and indirect energy consumption. Measures taken to improve energy efficiency. Use of renewable energies. 	GRI 103-2, GRI 302-1, GRI 302-2, GRI 302-4	4.2.1 Energy and Climate Change
	- Greenhouse Gas (GHG) emissions.	GRI 305-1, GRI 305-2	4.2.1 Energy and Climate Change
Climate Change	- Measures to adapt to Climate Change.	GRI 102-15, GRI 103-2, GRI 201-2, GRI 305-5	4.2.1 Energy and Climate Change
	- GHG emissions reduction targets.	GRI 103-2	4.2.1 Energy and Climate Change
Protection of	 Measures to preserve or restore biodiversity. 	GRI 103-2, GRI 304-3	Not material
biodiversity	- Impacts caused by the activity.	GRI 304-2	Not material
Information regar	ding social issues and staff		
Policies	- Management focus.	GRI 103-2, GRI 103-3	3.1 Information on social - and personnel-related matters - Policies
	 Total number and distribution of employees by gender, age, country and professional classification. 	GRI 102-7, GRI 102-8, GRI 401-1, GRI 405-1	3.2.1 Employment and remuneration
Employment	 Total number and distribution of employment contract types. 		3.2.1 Employment and remuneration
	 Average annual number of permanent, temporary and part-time contracts, by gender, age and professional classification. 		3.2.1 Employment and remuneration
	 Number of dismissals by gender, age and professional classification. 		3.2.1 Employment and remuneration
	 Average remuneration by gender, age and professional classification or equal value. 	GRI 102-35, GRI 102-36,	3.2.1 Employment and remuneration
	– Salary Gap.	GRI 201-3, GRI 202-1, GRI 405-2	3.2.1 Employment and remuneration



Contents of the Statements	Law 11/2018 on Non-Financial Information	Standard employed	Section of the Report
	 Remuneration of equal jobs or company average. 		3.2.1 Employment and remuneration
	 Average remuneration of directors and executives, with gender breakdown. 		Note 27 on the Consolidated Annual Accounts of Corporación Financiera Alba, S.A. and Subsidiaries for the financial year 2020. There were four female Board
			members at Alba during the 2020 financial year.
	- Work switch-off measures.	GRI 103-2	3.2.2 Organisation of the work
	– Employees with disability.	GRI 405-1	3.2.1 Employment and remuneration
	- Organisation of working hours.	GRI 102-8, GRI 103-2	3.2.2 Organisation of the work
Organisation of work	- Number of hours of absence.	GRI 403-2	3.2.2 Organisation of the work
	- Work-life balance measures.	GRI 103-2	3.2.2 Organisation of the work
	- Health and safety at work conditions.	GRI 103-2 , 403-1	3.2.3 Health and Safety
Health and Safety	 Accident rate indicators separated by gender. 	GRI 103-2	3.2.3 Health and Safety
	- Occupational illnesses.	GRI 403-10	3.2.3 Health and Safety
Labour Relations	- Organisation of social dialogue.	GRI 102-43, GRI 402-1, GRI 403-4	3.2.4 Labour relations
	 Percentage of employees covered by collective agreement. 	GRI 102-41	3.2.4 Labour relations
	 Overview of collective agreements in the field of health and safety at work. 	GRI 403-4	3.2.4 Labour relations
Training	 Training policies. 	GRI 103-2, GRI 404-2	3.2.5 Training
	 Total training hours by professional category. 	GRI 404-1	3.2.5 Training
Accessibility	 Universal accessibility for people with disability. 	GRI 103-2	3.2.6 Accessibility and equality
Esueli	- Gender equality measures.	GRI 103-2	3.2.6 Accessibility and equality
Equality	– Equality plans.		3.2.6 Accessibility and equality



Contents of the Statements	Law 11/2018 on Non-Financial Information	Standard employed	Section of the Report
	- Employment development measures.		3.2.6 Accessibility and equality
	- Sexual and gender harassment protocols.		3.2.6 Accessibility and equality
	 Universal accessibility of people with disability. 		3.2.6 Accessibility and equality
	- Anti-discrimination and diversity management policy.	GRI 103-2, GRI 406-1	3.2.6 Accessibility and equality
Information regard	ding respect for human rights		
Policies	- Management focus.	GRI 103-2, GRI 103-3 GRI 412-2	5.1 Ethical behaviour and respect for Human Rights
Human Rights	 Application of due diligence procedures. Measures to prevent and handle any possible abuses committed. 	GRI 102-17, 103-2, GRI 419-1	5.1 Ethical behaviour and respect for Human Rights
	 Complaints of cases of human rights violations. 		
	 Promotion and fulfilment of ILO provisions. 		5.1 Ethical behaviour and respect for Human Rights
Information on co	mbating corruption and bribery		
Policies	- Management focus.	GRI 103-2, GRI 103-3, GRI 205-2	5.2 Combating corruption and bribery
Corruption and bribery	- Anti-corruption and anti-bribery measures	- GRI 103-2	5.2 Combating corruption and bribery
	- Measures to combat money laundering.		5.2 Combating corruption and bribery
	 Contributions to foundations and non- profit entities. 	GRI 103-2, GRI 201-1, GRI 203-3, GRI 415-1	6.1 The company's sustainable development commitments
Information about	the company		·
Policies	- Management focus.	GRI 103-2, GRI 103-3	6.1 The company's sustainable development commitments
Company commitments to sustainable	 Impact of the company's activity on employment and local development. Impact of company activities on the local 	GRI 203-1, GRI 203-2, GRI 204-1, GRI 413-1, GRI 413-2	6.1 The company's sustainable development commitments



Contents of the Statements	Law 11/2018 on Non-Financial Information	Standard employed	Section of the Report
	- Ongoing relations with local communities.	GRI 102-43, GRI 413-1	6.1 The company's sustainable development commitments
	 Actions for partnership. 	GRI 102-13, GRI 203-1, GRI 201-1	6.1 The company's sustainable development commitments
	 Inclusion of ESG aspects in the purchasing policy. 	107KI 102-9 07KI 103-3	6.2 Subcontracting and suppliers
Subcontractors and suppliers	 Consideration in the relationship with suppliers and subcontractors of their social and environmental responsibility. 		6.2 Subcontracting and suppliers
	 Systems for supervision and audits, and the corresponding results. 		6.2 Subcontracting and suppliers
Consumers	 Consumer health and safety measures. 	GRI 103-2, GRI 416-1, GRI 416-2, GRI 417-1	6.3 Consumers
	 System for handling complaints and grievances received. 	GRI 102-17, GRI 103-2, GRI 418-1	6.3 Consumers
Tax information	– Profits earned, by country.	GRI 201-1	Note 22 on the Consolidated Annual Accounts of Corporación Financiera Alba, S.A. and Subsidiaries for the financial year 2020
	 Profits taxes paid. 		Note 22 on the Consolidated Annual Accounts of Corporación Financiera Alba, S.A. and Subsidiaries for the financial year 2020
	 Public grants received. 	GRI 201-4	No Public Authority grants were received during 2020.

Corporación Financiera Alba, S.A. and Subsidiaries

Independent limited assurance report on the Consolidated Non-Financial Statement for the fiscal year ended 31 December 2020.

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

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



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INDEPENDENT LIMITED ASSURANCE REPORT

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 2020 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 7 "Table of contents of the Non-Financial Information Statements" 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 7 "Table of contents of the Non-Financial Information Statements" 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.

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 2020.

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 2020 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 2020 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 2020.
- Verification, by means of sample-based review tests, of the information relating to the contents identified in the NFIS of 2020 and the appropriate compilation thereof based on the data furnished by the information sources.
- Obtainment of a representation letter from the directors and management.

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 2020 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 7 "Table of contents of the Non-Financial Information Statements" on the NFIS.

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.

DELOITTE, S.L.

Ignacio Ramirez April 26th, 2021