

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

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

Independent verification report of the Consolidated non-financial information statement for the financial year closing on 31 December 2020

INDEPENDENT VERIFICATION REPORT OF THE CONSOLIDATED NON-FINANCIAL INFORMATION STATEMENT OF GRUPO TRADEBE MEDIO AMBIENTE, S.L., AND SUBSIDIARY COMPANIES FOR THE 2020 FINANCIAL YEAR

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

In accordance with Article 49 of the Commercial Code, we have conducted an independent limited assurance verification of the attached consolidated non-financial information statement (hereinafter, CNFIS) for the financial year closing on 31 December 2020 of Grupo Tradebe Medio Ambiente, S.L. and subsidiary companies (hereinafter, Tradebe Environmental Services), which forms part of the Group's Management Report.

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

Responsibility of the directors

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

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

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

Our independence and quality control

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

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

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

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

Our responsibility

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

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

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

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

- Meetings with the staff of Tradebe Environmental Services to understand the business model, policies and management approaches applied and the main risks related to these issues and to obtain the information required for the external review.
- Analysis of the scope, relevance, and integrity of the contents of the CNFIS for the 2020 financial year based on the materiality analysis carried out by Tradebe Environmental Services and described in section 1.6, bearing in mind the provisions of the commercial regulations in force.
- Analysis of the information collection and validation processes presented in the CNFIS for the 2020 financial year.
- Review of information related to the risks, policies and management approaches applied regarding the material topics presented in the CNFIS for the 2020 financial year.
- Verification through tests based on the selection of a sample of information related to the contents of the CNFIS for the 2020 financial year and adequate compilation thereof based on the information provided by the sources.
- Procurement of a letter of representation from the directors and management.

Conclusion

Based on the procedures carried out and the evidence we have obtained, no additional aspect has been revealed that would lead us to believe that the CNFS of Grupo Tradebe Medio Ambiente, S.L. and subsidiary companies for the financial year closing on 31 December 2020 was not drawn up, in all significant aspects, in accordance with the provisions of current commercial regulations and following the criteria of the GRI Standards selected in accordance with the description for each matter in the table included in Appendix II-Contents and relation to GRI standards of the CNFIS.

Use and distribution

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

RSM SPAIN AUDITORES, S.L.P.

Mario Cepero Randos

Partner

Barcelona, 26th March 2021

NON-FINANCIAL REPORTING 2020



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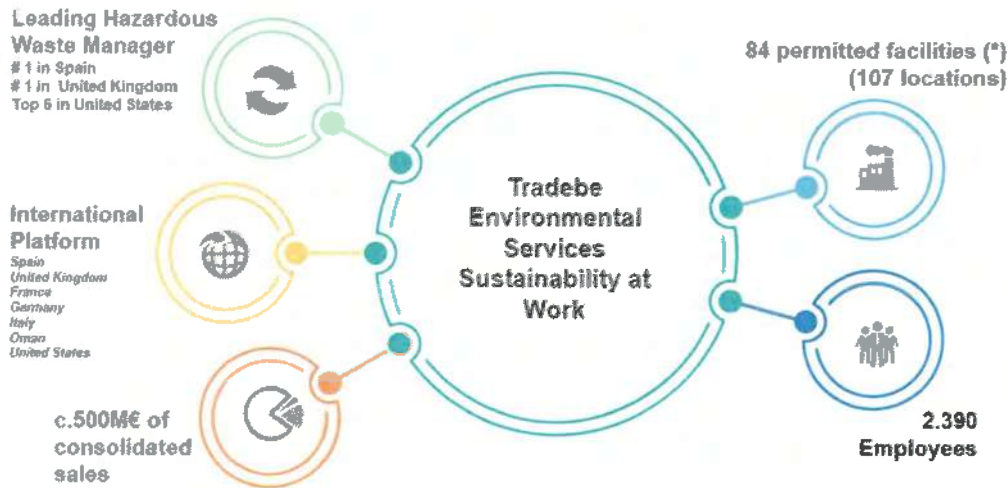


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1. ORGANISATION AND BUSINESS ENVIRONMENT

1.1. Company Profile



(*) The concept permitted facilities includes plants or authorized waste treatment and management sites as well as certified laboratories.

Grupo Tradebe Medio Ambiente, S.L. is the holding company of Tradebe¹, which is domiciled at calle Punta Sollana, 12, in Ziérbena (Bizcaia), Spain.

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

The non-discretionary nature of the services provided by the company is due to the fact that Tradebe's activity (a) is strongly aligned with existing environmental laws, standards and regulations, (b) applies and complies with said legal framework for the industry (industrial waste generators), and (c) is supervised and monitored by the corresponding authorities and environmental agencies to ensure compliance.

Tradebe specialises in the provision of environmental services to industry relating to the **management, reduction, remediation, collection, treatment, recovery, recycling and/or disposal of industrial waste**, mainly industrial hazardous waste and, to a lesser extent, non-hazardous waste. The company also specialises in the commercialisation and **sale of by-products from the recycling of this waste**.

Tradebe was founded in 1984 by Josep Creixell, who identified the need to offer specialised environmental services to industry, with its increasing complexity of generated waste. He foresaw a future of increased environmental awareness within both society and industry.

¹ See Appendix 1 for a list of all the companies which compose the group by country

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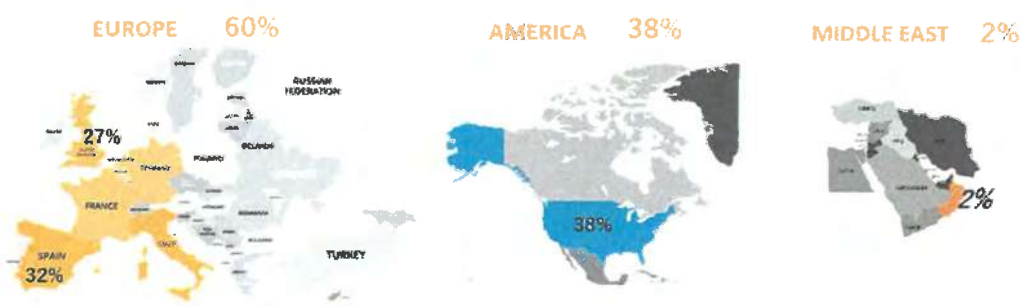
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Since its foundation, Tradebe has combined organic and inorganic growth to adapt and overcome different economic cycles. In terms of its evolution, there are two main periods:

1. **Initial period (1984-2005)** Creation and consolidation of Tradebe as Spanish market leader for the provision of environmental services to industry. Tradebe starts to have an international presence in the United States and the United Kingdom.
2. **Internationalisation period (2005-2020)** Consolidation of Tradebe in the United States and the United Kingdom markets and start of activity in Germany and Italy.

In 2020, nearly two thirds of Tradebe sales are generated in Europe, and the rest in the United States.



1.2. Business Environment

Sector diversification

Tradebe provides its services to several industries and sectors. The main industry sectors it provides services to are: Materials and Chemicals (pharma, chemical, petrochemical industries), Energy (Oil and Gas industries, terminals, pipelines), Industrial (metal and mining industries), Utilities (electrical industry), Automotive, Healthcare and Government (Healthcare system, Defence, etc.).

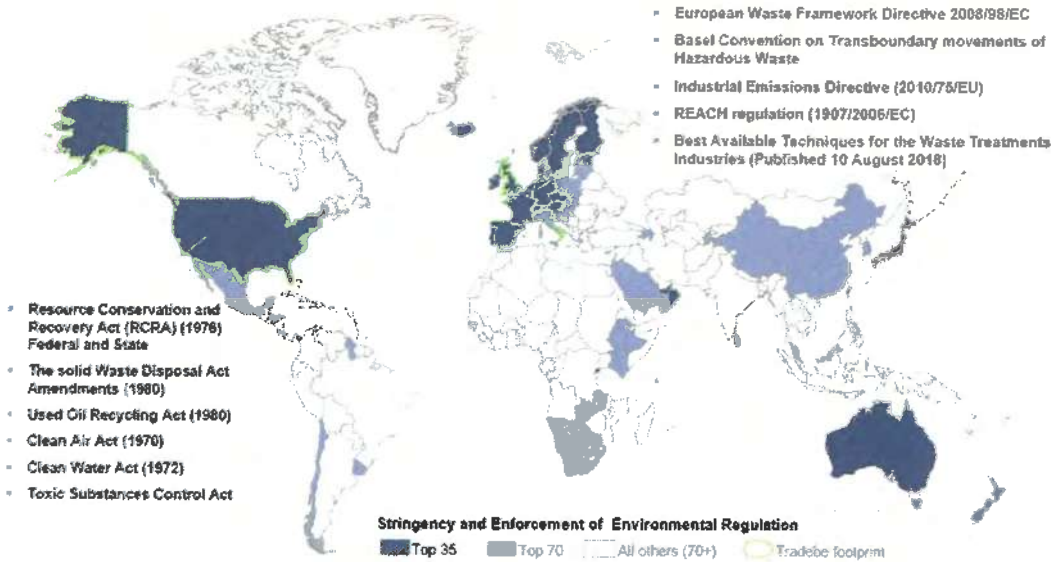
Tradebe is present in countries with some of the strictest and most rigorous environmental laws. The map below details those countries in which Tradebe operates permitted facilities and shows the high correlation between the markets in which Tradebe operates and the level of strictness and application of environmental regulations.

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Source: World Economic Forum, Executive Opinion Survey

Activity diversification

Tradebe's activity is aligned with the concepts of:

- **Circular Economy**

The recently coined concept of the 'Circular Economy' is becoming increasingly relevant and is setting the course and stringent nature of environmental and social regulatory frameworks (Corporate Social Responsibility).

The Circular Economy, which is diametrically opposed to the concept 'Linear Economy' (take, make, dispose), fosters the minimum use of raw materials and energy and maximisation of recycling and reuse.

- **Waste Hierarchy**

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

For example, Article 4 of the EU Waste Framework Directive has recently introduced the concept of 'Waste Hierarchy', which basically establishes an order of preference when promoting responsible and sustainable waste management. This concept goes beyond the traditional 3-R approach (Reduce, Reuse, Recycle) and establishes a more thorough 5-step hierarchy indicating a priority, from the most to the least favourable actions, from an environmental perspective (Prevention, Preparation for Reuse, Recycling, Recovery and Disposal).

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



• **RECYCLING AND ENERGY RECOVERY**

Recycling and energy recovery account for approximately 35% of revenue in 2020.

Recycling

Recycling consists of processing and cleaning waste (contaminated product) to obtain secondary raw materials and give them the same use as the original raw material.

The main raw materials or recycled products are solvents, crude oil by-products (fuel and oil) as well as iron and metals.

- a) **Solvent Recycling**
Tradebe holds a leading position in Europe in the recycling of solvents and has three (3) distillation plants in the UK, one (1) in Spain, one (1) in Germany (Schwarzheide), and one (1) acquired in Italy in 2019 (Fidenza).
- b) **Fuel/Oil Recycling**
Since 1989, Tradebe has been recycling waste with a high hydrocarbon content from tanks, containers, quarries, rafts and in particular vessels (MARPOL, Appendix I of the Convention). Its facilities obtain a high specification product which is certified for use as a clean fuel (enhanced fuel oil or 'Tradebe Green Fuel').
- c) **Metal Recycling**
Tradebe operates two (2) fragmentation plants for out-of-service vehicles and engines in Spain (in the Basque Country and Catalonia). These facilities separate metals (aluminium, copper, zinc) for their subsequent sale and commercialisation to steel mills and the metal industry.
- d) **Production of Light Weight Aggregate (LWA)**
Tradebe also produces LWA, which is an extremely light and very resistant porous ceramic material, and is used in the construction of infrastructures (motorways,

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airports) and buildings (skyscrapers, hotels, convention centres etc.).

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

Energy Recovery

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

- **TECHNICAL SERVICES**

Technical services account for approximately 59% of revenue in 2020 and are divided into Treatment and Final Disposal Services.

Treatment

Waste Treatment Services account for c. 49% of revenue in 2020 and are carried out in transfer stations and treatment plants. VC

Transfer Stations

The logistics for hazardous industrial waste outside of the client's facilities starts at our transfer stations. These are logistics centres where the different types of waste are segregated and classified to be later transported to recycling, energy recovery, treatment, or final disposal plants.

Treatment Plants

Hazardous waste is characterised by its ignitability, corrosivity, reactivity and toxicity. Waste treatment services consist of treating hazardous waste to reduce or neutralise these characteristics, along with weight and volume, through physical-chemical (solidification, neutralisation, stabilisation, decanting, centrifuging), thermal, biological treatments, etc. which require different technologies, facilities and a high level of specialised knowledge and know-how. M

In addition to more standard treatment services, Tradebe provides specialised waste treatment services such as, low- and medium-intensity radioactive waste treatment services and clinical waste final disposal services in the United Kingdom.

Disposal Services

Disposal Services consists of the final disposal of waste through controlled deposits and high-temperature thermal treatment (without an Energy Recovery element). J

a) **High-temperature thermal treatment**

Tradebe operates one of the two high-temperature thermal treatment facilities MC C

authorised for hazardous waste in the United Kingdom with an annual capacity of approximately 45,000 tonnes. It also operates high-temperature thermal treatment facilities authorised for clinical waste in the United Kingdom.

b) Controlled deposits

Tradebe operates three (3) industrial waste controlled deposits in Spain (Catalonia, Madrid and Castilla la Mancha). Tradebe operates the only authorised hazardous industrial waste deposit in Catalonia, and, since 2019, has operated one (1) non-hazardous industrial waste deposit in the United States (Baton Rouge | Louisiana).

• **FIELD SERVICES**

Field Services, which account for 6% of revenue in 2020, consist of environmental services that are provided at the client's facilities (as opposed to Recycling & Energy Recovery and Technical Services, which are mainly carried out at authorised Tradebe facilities).

Industrial services

Industrial services mainly correspond to Prevention, Industrial Cleaning, Emergency Response, Remediation and Total Waste Management services.

Environmental and Marine Survey Consultancy and Laboratory

Tecnoambiente, S.L.U., which is based in Spain, is the environmental consultancy of Tradebe and specialises in the marine environment and both offshore and onshore projects. Tecnoambiente has experience in international projects in Europe, Africa, Asia, and America where it carries out geophysical, hydrographic and baseline campaigns for clients in the oil and gas, renewable energy, submarine cables and ports sectors. Tecnoambiente also has three (3) accredited laboratories.

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1.3. Mission, vision, and values

Our Vision:

At Tradebe we want to be the ever-growing leader in all the markets we operate in.

Our Mission:

We work to provide sustainable, innovative, and quality solutions that contribute to improving our environment and create value for our stakeholders.

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



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1.4. Governance

As at 31st December 2020, the Board of Directors of Tradebe is made up of 5 members (1 woman and 4 men) aged between 29 and 71 years. Board members meet the criteria of honourability, experience and good governance required by the applicable regulations and cover the range of knowledge required by the group's activities.



In 2020, the Board of Directors met 4 times to review, to be informed and, if necessary, to take decisions on key matters, including group results, strategic planning, budget, and compliance with legal and contractual obligations.

The members of the Tradebe's Executive Committee as at 31st December 2020 are:



1.5. Procedures for the preparation of the report

This Non-Financial Information Statement which corresponds to the period ending on 31st December 2020 includes both stand-alone and consolidated information for all the companies in the Tradebe group (which consists of Grupo Tradebe Medio Ambiente, S.L. and its subsidiaries, as detailed in Appendix I) on all significant matters required by Law 11/2018 of December 28 on non-financial information and diversity. It has been prepared taking as a reference the GRI (Global Reporting Initiative) standards, which constitute the international framework for sustainability reporting. For those indicators that are not included in the standards, the group's own reporting criteria have been used.

According to current legal requirements, this Non-Financial Information Statement has been verified by RSM Spain Auditores, S.L.P.

This Non-Financial Information Statement is prepared on an annual basis. The first report was issued in 2018.

Please address any queries regarding this report or its contents via the company's website: www.tradebe.com

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1.6. Materiality analysis and stakeholders

The purpose of Non-Financial Reporting is to respond to the risks and impacts that are of interest to the collectives and individuals that interact with the group, and that are, at the same time, strategic objectives for the group.

In order to identify and prioritise the most pertinent issues for Tradebe and its stakeholders, the organisation has carried out an internal and external assessment taking into account the context of sustainability, the principles of materiality and comprehensiveness, and in particular, the following factors:

- Economic, environmental, and social impacts derived from the organisation's activity that can be reasonably measured.
- Interests and expectations of the stakeholders that are part of the organisation or invest in it, such as employees and shareholders.
- Key issues and future challenges for the sector.
- Law 11/2018 of 28 December regarding non-financial information and diversity and laws and regulations that are strategically important to the organisation and its stakeholders.
- Core values, policies, strategies, operational management systems, objectives, and purposes of the organisation.
- Basic core competencies of the organisation and the ways in which it can contribute to sustainable development.
- Consequences for the organisation regarding its impact on the economy, environment and/or society.

The stakeholder groups that have been included in this assessment are:

- Employees
- Clients and Suppliers
- Public administration and public and regulatory bodies
- Trade associations from the environmental sector
- Media
- Financial entities and investors
- Competition
- Trade unions
- Executive Committee / Shareholders

The material aspects identified in the analysis, and ranked in order of are:

- Industrial Safety
- Occupation Health
- Compliance with environmental regulation
- Environment
- Workplace practices

The materiality approach is global, and aims to respond to all of the needs and impacts of the companies that are included in this Non-Financial Information Statement.

In this respect, the reporting issues required by Law regarding non-financial information and diversity are covered in this chapter.

For the purpose of compliance, details of the matters requested by said Law, and which are relevant for the group based on the materiality analysis, are explained in detail in the following chapters and in the Appendix of contents of the Law.

2. OBJECTIVES, RISKS AND MITIGATING FACTORS

Tradebe's strategy is based on the following pillars:

- (i) Profitable and selective (organic and inorganic) growth through:
 - a. Consolidation in markets in which Tradebe is already positioned (United States, Spain, and the United Kingdom).
 - b. Expansion in new markets (i.e., Continental Europe).
 - c. Exploring market opportunities in the Middle East.
- (ii) Development and focus on activities that are more aligned with the **Circular Economy** and **Waste Hierarchy**.
- (iii) Competitive differentiation and improved service to clients through the implementation of digitalisation initiatives and improved efficiency in business processes.
- (iv) Ensuring a high capacity of execution, service, and results using initiatives to attract, manage and retain talent.



Tradebe business model supports and promotes the Sustainable Development Goals (SDGs) and the United Nations 2030 Agenda to transform the world.

From its position as leaders in waste management, Tradebe embraces its responsibility towards the environment, and is determined to protect the planet through its recycling solutions.

Tradebe's main focus is on the concept of the 4Rs: **Reduce, Reuse, Recycle, Recover**. Based on this, it continues to develop a Total Waste Management approach, providing flexible, innovative, and technologically driven solutions.

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Tradebe has supported numerous actions relating to the SDGs. Here are some examples:

- At the end of July 2020, Tradebe Chemicals division began operations at the facilities it built at the **Schwarzheide** site of a large chemical company. An agreement was signed to recover the material generated on its production cycle, which had previously been eliminated using thermal treatment.
The client has the mission and commitment to produce chemical products for a sustainable future and has therefore committed to applying circular economy solutions to its production processes. This collaboration with Tradebe will allow the client to obtain the maximum value from its solvent waste through the recycling process as well as recover them with a purity of 99.9%, moving them one step closer to sustainability.
- The approach used by the **Environmental Consultancy Services** (provided by Tecnoambiente) to carry out the seabed survey prior to the installation of power cables

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between Mallorca and Menorca meant that seafloor conditions that would otherwise have compromised the cable laying operations and environmental protection could be identified and mitigated.

- At the Tradebe composting site in Jorba, **coffee capsules are transformed into compost which is needed to fertilise rice fields**. Tradebe's collaboration in this humanitarian rice project has led to the donation of 117 tonnes of rice to food banks throughout Spain.
- Tradebe Chemicals received the **"Sustainability Award 2020"** at the Chemicals Northwest Awards in recognition of a project that helped to support a customer's shift towards a circular economy through an annualised net saving of 30,000 tonnes of CO₂.

Tradebe has developed technology which converts **Marpol (maritime waste) into a high-quality product which has a comparable performance to the original fuel**. The results have shown that the circular process is achievable, converting waste into a high-quality product that complies with the parameters required by the International Maritime organisation for maritime fuel.

2.1. Main risks and mitigating factors

The primary risk factors to which Tradebe is exposed are grouped into five main categories: financial, regulatory, cybersecurity, accidents and acquisitions.

Risk	Corporate Risk	Risk management
Regulatory	<ul style="list-style-type: none"> • Breach of environmental duties • Non-compliance with environmental regulation • Litigations and claims 	<p>Tradebe's activities are subject to a strict regulatory compliance in its different areas of activity (accounting standards, environment, safety, labour, data protection and tax, among others). For example, some of the regulations that have a clear impact on the organisation include the adaption of facilities in Europe to the BREF requirements (Best Available Techniques Reference Document for Waste Treatment, from 2018), the EU Climate Action and European Green Deal (COM/2019/640 final) and the Circular economy action plan from the European Commission, dated 11th March 2020.</p> <p>The strict regulatory framework under which the group operates requires Tradebe to make significant efforts to comply with all of the multijurisdictional requirements. Failure to fulfil any of these requirements could result in licence revocation, sanctions and/or fines, which may prevent the group from carrying out part or all of its activities.</p> <p>The management approach is to consider this risk as an opportunity, promoting a culture based on the ethical commitment of doing the right thing, and turning the stringent regulations into a tool for improvement and a sign of excellence. The increasingly stringent nature of environmental legislation has become the focus of efforts</p>

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Risk	Corporate Risk	Risk management
		<p>to obtain more efficient recycling methods, as well as an increased awareness from clients and society on environmental issues.</p> <p>All business operations at Tradebe are based on a range of best practices and standards, and the integrated management system enables activities to be managed as efficiently as possible while fulfilling the requirements of a worldwide organisation in environmental and safety matters. A team of 67 professionals is responsible for ensuring the correct application of the integrated management system and for carrying out activities that guarantee the prevention of environmental and occupational health risks.</p>
Cyber risks	<ul style="list-style-type: none"> • Exposure to cyber-attacks 	<p>Tradebe is exposed to cyber-risks and attacks that could have a negative impact on its results, reputation, and image.</p> <p>In addition to its digitalisation strategy and improving the efficiency of business processes, the group has a strong position with regard to cyber-security, which is one of its strategic priorities.</p>
Accident risk	<ul style="list-style-type: none"> • Human exposure to accidents • Installation exposure to incidents 	<p>Tradebe's activities and its employees are exposed to accidents and incidents. In addition to the corresponding insurance policy (i.e., damages) the group has an external technical advisory service which specialises in the safety of people and facilities in order to prevent the risk of accidents. These services include training, preventive inspections, technical advice on health and safety, and technical consultancy services.</p> <p>The management approach is that nothing is worth getting injured over, all accidents and hazardous situations are preventable, and safety must be actively managed.</p> <p>In addition, the group has a team of 67 professionals who are responsible for carrying out activities to ensure the prevention of environmental and occupational safety risks.</p> <p>Care for the health and safety of employees is above and beyond being a priority and has been included as one of the group's values.</p>
Risks associated to COVID-19	<ul style="list-style-type: none"> • Employee exposure 	<p>In this crisis, there is a risk to employee health as a result of coronavirus transmission in the workplace. Tradebe has developed risk assessments of its employees, especially for those who carry out frontline activities and</p>

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Risk	Corporate Risk	Risk management
		<p>are therefore more exposed. As a result, control measures have been identified and the appropriate protocols and guidelines have been developed. (See list of measures in Note 4.4).</p> <p>In addition, as an essential services provider, Tradebe closely monitors the impact of COVID-19 on the company and the supply chain, working hard to minimise the impact of the pandemic on the organisation. As well as prioritising the health and well-being of its employees, the group has continued to provide essential services, while also protecting the health of its clients and the business it serves.</p>

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3. ENVIRONMENTAL MATTERS

3.1. Management approach

Environmental issues are the *raison d'être* of Tradebe's main business. They have therefore been considered as one of the most relevant material aspects for this Non-Financial Information Statement.

This section deals with the following qualitative areas that have been considered highly relevant by the organisation and are in line with the requirements established by Law 11/2018 on non-financial information and diversity:

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

Tradebe applies ethical values and sustainability criteria while carrying out its activities and searches for innovative and quality solutions in each of its processes, prioritising people's safety and health and safety, environmental protection, and client satisfaction with sustainable, ethical and profitable business growth.

Aware of the importance of the health and safety of all employees, environmental protection and client satisfaction, Tradebe has an **INTEGRATED QUALITY, SAFETY and ENVIRONMENTAL POLICY**, whereby it commits to integrating its management system and focusing its policy on the following core principles:

- Comply with local or voluntary and stakeholder requirements** applicable to every workplace regarding safety (industrial and/or serious accident), occupational health and environmental protection.
- Offer quality services** to its clients and main stakeholders (private companies, public bodies) which aim to meet their needs and expectations, and secure their trust and loyalty.
- Continue to improve**, based on a strategic analysis of the context of each business, managing the risks and opportunities that are identified and influencing behaviour related to the prevention of accidents (particularly serious accidents) and damage (to health), environmental protection (using the best possible energy management and quality assurance).
Promote cultural change in the organisation based on three core concepts: increase the commitment and leadership of all employees, give greater visibility to directors and managers, who lead by example, and give all employees a more important role through improved communication and active participation.
- Allocate the necessary and adequate technical and human resources** to maintain a documented integrated management system that ensures compliance with this policy.

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- v. **Monitor health and safety in the workplace**, both for employees and third-parties based on the risks inherent to each job or activity and eliminate avoidable risks and assess those that are unavoidable.
- vi. **Prepare, verify, and review self-protection plans and emergency measures**, as well as improve and systemise emergency and crisis management planning.
- vii. **Cooperate with the administration, competent public bodies, and other business associations** in the search for solutions to the environmental issues facing our society.
- viii. **Promote pollution prevention and environmental protection**, giving priority to the application of technologies and processes based on minimisation and recovery criteria, and assisting clients in the European objective of a Circular Economy.
- ix. **Minimise the impact** on the environment and the health and safety of employees and stakeholders and manage change effectively.
- x. **Promote the development of employee talent** through information, training, and awareness-raising, to achieve the established objectives of continuous improvement.
- xi. **Ensure the correct coordination of business activity** which is necessary to ensure that the existing legal requirements and applicable internal work regulations are met.

All Tradebe businesses operate based on a range of best practices and standards, and the integrated management system enables activities to be managed as efficiently as possible while fulfilling the environmental and safety requirements of a global organisation. This integrated management system covers all employees and all workplaces in the organisation.

A team of 67 professionals based in the UK, United States and Spain (distributed by one-third at each country), are responsible for ensuring that the integrated management system is implemented correctly and for carrying out the activities that are required in the prevention of environmental and safety risks in the workplace.

3.2. Group policies relating to environmental issues

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

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

In summary, the integrated management system considers all the environmental aspects associated with the group's activities, based on the knowledge it has of the activity, as well as any other available information (interviews with operations, checklists, studies, etc.).

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

There is a wide range of inherent risks associated to the group's activity, which includes those related to the health and safety of individuals as well as environmental aspects. After the analysis in section 1.6, the following risks have been identified as significant:

- (i) Risks associated to industrial security (i.e., accidental spillages, accidental ignition, accidental reactions or incompatible substances)
- (ii) Risks associated with occupational health and safety in the workplace (i.e., accidents, human exposure to hazardous waste)
- (iii) Risk of non-compliance with environmental regulation (i.e., waste management, emissions monitoring)
- (iv) Risk to the environment (i.e., water pollution, consumption of natural resources, raw materials, and energy)

These risks are managed and minimised through:

- Implementation and maintenance of correct **safety devices and systems** in the plants
- **Regular plant inspections** for specific programs
- **Spill prevention** and containment procedures
- **Procedures** to prevent, for example, the accidental ignition and/or reaction of incompatible waste or materials

The **Resource Conservation and Recovery Act (RCRA)² permits**, and the **ISO certifications** constitute the reference framework for the group's safety, health and environmental policies, which set out both the frequency and scope of inspections and represent the fundamental basis for preventing the environmental risks identified above.



Tradebe's environmental permits and international certifications, which are checked via intensive inspections by the competent authority, are proof of the group's ongoing commitment to comply with legal and environmental requirements.

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

In summary, all of Tradebe's operations are focused on **waste management efficiency**, with the controlled consumption of raw materials, natural resources and energy consumption forming a

² Applicable in the United States. RCRA permits are issued by each state or by the EPA (United States Environmental Protection Agency). They establish the requirements regarding the treatment, storage, and disposal of hazardous waste, as well as the frequency of inspections and their scope.

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fundamental part. Each risk is managed and prevented as efficiently as possible, depending on its nature. For example:



Container storage

Drum and container storage areas are regularly inspected for structural integrity and proper sealing. In addition, processing and storage areas, laboratories and office spaces are equipped with easily accessible fire extinguishers, first aid kits, eye wash stations and emergency equipment to handle spills or spillages. The emergency equipment is correctly inspected in accordance with the established schedule, or more frequently if required, and specific training in the use of emergency equipment is provided to employees at the plant.



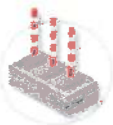
Water contamination

To prevent the risk of groundwater contamination, the discharge of hazardous waste onto unprotected ground is not permitted. The storage areas for tanks and containers are built on a concrete base with specific characteristics to control a spill incident and prevent risks. Any accidental spillage that occurs in these areas is collected and analysed. In the event of a spill, the waste, including the absorbent material used to clean it up, is stored, treated or disposed of appropriately.



Fire prevention

With regard to the risk of ignition, measures are in place to prevent fires and/or chemical reactions, all with the aim of ensuring, among others, that conditions of extreme heat, high pressure, fire, explosion or violent reactions do not occur and the uncontrolled release of toxic gases that could be a health hazard is avoided.



Air pollution

In terms of air pollution control, Tradebe's facilities have individual air pollution control systems which are subject to strict (national and/or regional) regulations and in accordance with international permits and certifications.

3.3. Policy outcomes

As a result of applying the environmental policies required by international permits and certifications, and as an integral part of the integrated quality management system, a series of plant upgrades are carried out every year with the aim of improving efficiency and safety. For example, the following improvements were carried out in 2020:

- Continuous review of processes with the aim of finding improvements that help to reduce the group's carbon footprint.
- Progressive replacement of existing lighting with LED lights, in order to reduce the consumption of electricity.
- Continuous improvements in access areas to reduce the risk of accidents.
- Continuous improvements in hydrocarbon pumps to reduce repairs and the risk of accidental spills.
- Implementation of technical improvements in processes, such as the implementation of an electro-oxidation unit at the Port of Tarragona plant, which treats wastewater that contains high levels of ammoniacal nitrogen, to guarantee the quality of the wastewater output.

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3.4. Impact of the group's activity on the environment

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

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

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

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

In addition, the option of providing industrial services at the client's facilities adds a global dimension to waste management service.

Due to strict standards, the emission limits established by the regulator, for which Tradebe's activities achieve high levels of compliance, and due to the group's commitment to ethical compliance, the group's activity does not pose a threat to health or environment.

In terms of the resources allocated to environmental risk prevention, and considering the group's activity, all Tradebe employees are undoubtedly engaged in one way or another to environmental risk prevention, by providing efficient recycling/recovery of waste generated by its clients.

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

3.5. Precautionary principle

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

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

3.6. Provisions and guarantees

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



- *Environmental Policy*, that covers companies in Europe up to 8.6 million euro per incident and annual aggregate.
- *Contractor's Pollution Liability and Professional*, that covers activity outside of Tradebe facilities in American companies, for an amount of 15 million euro per incident and annual aggregate.
- *Site Pollution (RCRA – Midwest)*, that covers activity in the Tradebe facilities of American companies located in Connecticut, Massachusetts, and New York with an RCRA permit (to manage hazardous waste), for an amount of 8 million euro per incident and 37 million euro in annual aggregate.
- *Site Pollution (RCRA – TN, IN, WI)*, that covers activity in the Tradebe facilities of American companies located in Tennessee, Indiana and Wisconsin with an RCRA permit (to manage hazardous waste), for an amount of 4 million euro per incident and 18 million euro in annual aggregate.
- *Site Pollution (Non-RCRA)*, that covers activity in the Tradebe facilities of American companies that do not manage hazardous waste, for an amount of 4 million euro per incident and 18 million euro in annual aggregate.

As specified in Note 20.1 of the consolidated annual report of Grupo Tradebe Medio Ambiente, the Group has provisions for asset decommissioning and environmental provisions amounting to 41.8 million euro.

3.7. Circular economy and waste management

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

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Sustainability 2020 Award

Tradebe Chemicals has received the 'Sustainability 2020 Award' at this year's Chemicals Northwest Awards in recognition of a project that helped to support a client's move towards a circular economy through an annualised net carbon savings of 30,000 tonnes of CO₂. The project required the setting up of a closed-loop recycling process for a prioritised waste stream, a reporting process for a full lifecycle carbon footprint, the implementation of improvement initiatives to reduce their carbon footprint and finally the provision of auditable carbon saving figures per tonne of recycled chemicals used instead of virgin chemicals.



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Circular economy in maritime transport

Since 2015, Tradebe has been researching improvements in the transformation process of Marpol (maritime waste or pollution) into reusable fuel. Results have been obtained that demonstrate that a circular process is achievable, turning fuel waste into a high-quality product with performance comparable to the original fuel, while complying with the parameters established by the International Maritime Organisation. This high-quality marine fuel reduces the energy consumption of traditional



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recovery processes by 50%, and contributes to the reduction of CO₂ emissions with regards to the exploitation of traditional fossil fuels.

Waste Management: 100% recovery in laboratory clearance | A Success Story



As a result of a laboratory relocation, a client needed to dispose of a number of samples and chemicals (loaded onto 250 pallets). With extensive experience in sustainable laboratory waste management, Tradebe provided fully integrated solutions for the sampling, classification, packaging, labelling and inventory completion as well as transportation and management of laboratory waste. As a result, an effective reuse, recovery, and recycling solution aligned with the client's responsible practices and sustainable development values was provided.

New concession at the Port of Barcelona

The Port Authority of Barcelona has granted the group's company Ecológica Ibérica y Mediterránea a new concession in the **Port of Barcelona** for 23 years and an area of 24.204 m², following the end of Tradebe's concession period at the end of 2020. The new concession is linked to an investment commitment to construct and manage a new plant dedicated to the treatment of industrial and maritime waste (mainly from ships) in the Port of Barcelona, which will provide continuity to the activity in more modern facilities.



The project is aligned with the EU's Circular Economy Objectives and considers the best available techniques in environmental matters, anticipating the application of Directive 2010/75/EU.

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

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Since obtaining the ISCC Plus certificate, all our products originating from this type of waste are shipped under a Sustainability Declaration. While certification cannot be the sole driver of the necessary transition to an environmentally, socially and economically sustainable future, it is an essential element to ensure transparency across the global supply chains and guarantee our commitment to the environment and sustainable production.

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Adherence to initiatives in favour of the circular economy

Tradebe has joined the Pact for a Circular Economy, promoted by the Spanish Association of Special Waste Managers (ASEGRE – *Asociación Española de Gestores de Residuos Especiales*) and the Agreement for the Climate Action, signed with the Catalan government (Generalitat de Catalunya).

Food waste

Regarding food waste, as required by Law 11/2018 on non-financial and diversity, it is considered minimal or non-existent in Tradebe's business and is only associated with employees' own consumption.

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3.8. Sustainable use of resources

- **Water and Energy consumption**

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

Water consumption often comes from wastewater treatment stations. This water is filtered, treated, and directed into the corresponding environmental channels so that it can be reused in treatments, thus minimising the use of tap water. Technological innovation is introduced, wherever possible, to reduce water consumption.

In 2020, the organisation consumed 406 million kWh (10% less than in 2019) and 20,902 mega litres of water (69,034 mega litres in 2019). This reduction in consumption is due to both the implementation of efficiency measures as well as the impact of COVID on ordinary activity.

Energy consumption is detailed below:

FUEL CONSUMPTION (kWh)				
	2020	2020 (%)	2019	2019 (%)
Natural Gas	89.352.978	25%	144.423.349	37%
Gasoil	88.596.937	25%	67.310.844	17%
Recycled Fuel	89.714.378	25%	107.551.080	28%
Biogas	66.004.854	19%	63.673.341	16%
Other fuel	19.319.199	5%	3.139.169	1%
TOTAL	352.988.347	100%	386.097.783	100%

ELECTRICITY and STEAM CONSUMPTION BY COUNTRY (kWh)				
	2020	2020 (%)	2019	2019 (%)
United States	35.977.540	45%	41.522.739	45%
United Kingdom	26.079.941	32%	28.415.842	31%
Spain	18.580.573	23%	23.002.071	25%
TOTAL	80.638.053	100%	92.940.652	100%

ENERGY SOLD (kWh)		
	2020	2019
Electricity	27.332.610	26.407.120
TOTAL	27.332.610	26.407.120

NET ENERGY CONSUMPTION (kWh)			
	2020	2019	Variation
TOTAL	406.293.789	452.631.314	-10%

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• **Waste Management**

In 2020, Tradebe facilities have received 1.7 million tonnes of waste (44% hazardous and 56% non-hazardous).



% of waste received that has been recovered through reuse, recycling and other techniques

From the total number of tonnes received, 47% of the hazardous waste, and 45% of the non-hazardous waste have been managed and recovered by Tradebe for reuse, recycling, or other recovery operations.

For the waste that has been finally taken for disposal (once the options for treatment have been exhausted), the main disposal methods include high-temperature thermal treatment (with or without energy recovery) and controlled deposit.



3.9. Climate change and management of other emissions

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

One of the many examples is the adherence of several UK plants to a Climate Change Agreement (CCA). CCAs are voluntary agreements made between industry and the environment agency to reduce energy use and carbon dioxide emissions. CCAs provide a formal and incentivised structure to improve energy efficiency, by setting targets and penalties for non-compliance. This agreement covers the period 2013-2023 and since joining the scheme, Tradebe has been above target in each period.

Through its actions, Tradebe is committed to reducing the pollution that causes climate change and being part of the #ForTheClimate Community, which is a pioneering initiative of people, companies, organisations and public administrations that unite under a common goal: to be protagonists in the action against climate change, in accordance with the directives set out in the Paris Agreement, limiting emissions so that the planet's average temperature does not exceed 1.5°C compared to pre-industrial levels, and that carbon neutrality is achieved by 2050. Within the framework of this commitment, Tradebe carries out the following activities, some of them related to the consumption of resources and indirectly to associated emissions:

- Reduction of energy consumption in purification plants
- Use of dual-flush or interruption systems in toilets
- Use of water-saving devices
- Correct maintenance of energy-consumption systems
- Reduction of energy consumption in water treatment plants
- Increased energy efficiency in processes of between 10% and 20%
- Implementation of videoconference systems or online meetings
- Implementation of waste recovery and recovery systems
- Reuse of waste in production processes

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In accordance with all of the Integrated Environmental Permits granted to the group, emission sources have the appropriate work equipment to ensure that established limits are observed, which is confirmed in periodical measurements carried out by third parties (collaborating entities of the administration).

Emissions management

- **Air:**

The main source of air emissions are combustion products (CO₂, CO, NO_x, SO₂, etc.) resulting from steam raising boilers at the thermal treatment sites. These emissions are directly related to the combustion of fuels.

There are strict emission limits in place for thermal treatment plants and Tradebe holds the necessary permits issued by the relevant environmental agency to meet these specifications.

In 2020, the group's facilities emitted 68,361 tonnes of CO₂ equivalent from their combustion processes (61,502 tonnes in 2019). Indirect emissions, mainly related to electricity consumption, amounted to 21,164 tonnes of CO₂ equivalent in 2020.

Committed to improving its management of emissions, Tradebe has joined the HFC (hydrofluorocarbon) Reduction Pact, promoted by the Spanish Association of Special Waste Managers (ASEGRE).

- **Volatile Organic Compounds (VOCs):**

VOCs result from the organic processes carried out in the chemical treatment plants (production of chemicals and liquid fuel) and are routinely monitored by plant employees to ensure they do not exceed the emissions permitted by the corresponding environmental agencies.

In 2020, Tradebe's facilities emitted 110 tonnes of VOCs.

3.10. Biodiversity protection

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

In fact, part of Tradebe's Environmental Consultancy includes studies related to the environmental assessment process including environmental impact and incidence studies such as:



- Inventories of Fauna and Flora
- Habitat mapping
- Census and state of fish populations
- Determination of ecological flows
- Limnological studies in lakes, wetlands, and reservoirs, including aspects of environmental recovery.

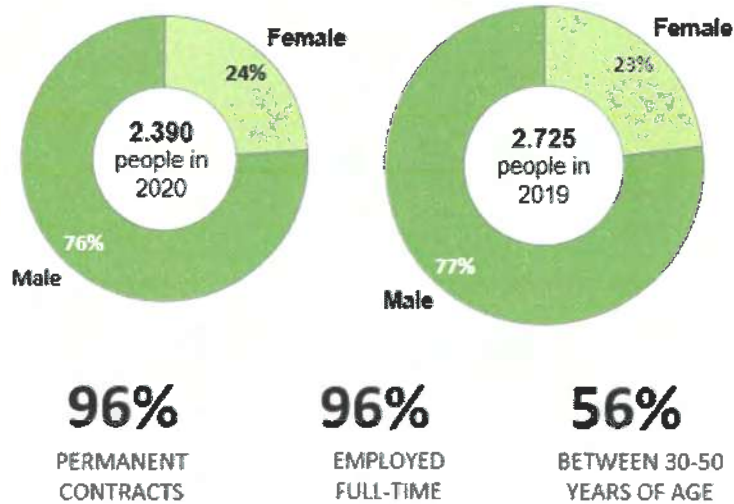
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4. SOCIAL AND EMPLOYEE MATTERS

As at 31st December 2020, Tradebe had 2,390 employees, 12% less compared to the previous year.



4.1. Management Approach

Tradebe has the firm commitment and obligation to create and maintain a working environment in which all people are treated with dignity and respect. Tradebe's employees are a key asset for the development of the business and, consequently, social and employee matters have been considered a material aspect for the Non-Financial Information Statement.

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

In addition to providing quantitative information on the number of employees and different classification criteria, this section will address the following qualitative areas that have been considered highly relevant by the organisation and are in line with the requirements established by Law 11/2018 on non-financial information and diversity:

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

4.2. Policies regarding social and employee matters

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

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As an environmental service provider and a group with a strong entrepreneurial spirit, Tradebe's employees are critical to its success; they are at the heart of the company and its most important asset.

Workforce development is one of the pillars on which Tradebe's business model is based. The organisation is committed to attracting, developing, and retaining talent, and workforce management and development are key to obtaining the organisation's strategic objectives. The cornerstone of Tradebe's business model is the management of the professional careers of its employees and the organisation's concern to offer them development opportunities, both on a training and professional level.

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

Tradebe's policies on social and employee matters are taken very seriously by the company and each employee has the duty to act responsibly. Wilful failure to apply these policies, or any evidence of discrimination, harassment, bullying, or victimisation is unacceptable and sanctionable.

One of Tradebe's policies on social and employee issues is its **Code of Conduct**, which includes the organisation's global philosophy and values, and aims to ensure the sustained long-term success of Tradebe worldwide through the appropriate conduct of its employees. The Code of Conduct is made available to all new employees so that they are aware of the core values of the organisation and provides a framework for employee behaviour in the day-to-day operations of the company.

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

- **Equal Opportunities Policy**, which establishes that Tradebe is an employer that acts in accordance with the principles of equal opportunities.
- **Recruitment policy**, which provides guidelines on the recruitment process and reaffirms the organisation's position regarding equal opportunities.
- **Whistleblowing policy**, which establishes that Tradebe is committed to managing the organisation in the best way possible and in line with its values. For this purpose, it requires employees' cooperation in reporting any possible irregularity or bad practice that they detect or suspect.
- **Policy against alcohol consumption and drug use in the workplace**, which establishes that Tradebe workplaces must be alcohol and drug-free in the employees' own interest in order to ensure a safe, healthy, and efficient workplace.

The policies on social and employee matters at Tradebe focus on managing and mitigating several risks, including:

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

Under strong and experienced leadership regarding social and employee matters, Tradebe promotes communication and dialogue so that employees and the organisation in general can

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continue to improve. All employees have access to any member of the Executive Committee to discuss their ideas and concerns.

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

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

4.3. Work organisation

Working hours and applicable work-life balance measures are regulated by the regulatory framework of each territory in which the group operates, and are defined by the corresponding collective bargaining agreement.

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

Since new lock-down measures related to COVID-19 pandemic came into force in early 2020, the group has provided sufficient resources (i.e., technological) and has created the necessary conditions for employees, whose job allows it, to work remotely, ensuring operational continuity. Similarly, efforts have been made to overcome the challenge of having teams located in multiple locations and time zones, and to ensure that employees are able to follow individual working hours and enjoy a work-life balance.

Absenteeism and sick leave due to COVID

The rate of absenteeism in Spain is 6.56% in Spain, 2.56% in the United Kingdom and 2.29% in the United States. This rate is calculated by considering absence from work when employees are due to be present (excluding permitted absences such as holidays, maternity or paternity leave, and days off) over the total days scheduled to be worked.

In 2020, there was a total of 367 employees who were off sick due to COVID.

4.4. Workplace health and safety

The safety of its employees and any other people who interact with the group's activities is Tradebe's highest priority, and as such, health and safety are embedded at the very core of its corporate strategy.

While workplaces are designed to minimise health and safety risks, accidents and hazardous situations can only be prevented when safety is actively managed and a culture of compliance exists. The organisation has therefore developed, and continues to build upon, a strong ethos that encourages every employee to take responsibility for their own safety as well as the health and safety of those around them, stipulating that:

- Nothing is worth getting injured over
- All accidents and potentially hazardous situations are preventable
- Safety must be actively managed

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To reinforce and extend this culture throughout the organisation, the group has developed the 7 *Life Saving Rules*, that represent its fundamental aspects. These rules cover the highest risk activities and apply to employees and contractors alike. Such activities include working in confined spaces, handling and managing ignition sources in flammable areas, working at height, waste energy management, pedestrian-vehicle distances, phone and/or radio use and exposure to chemicals.

Employee health and safety

Tradebe aims to ensure that its processes are appropriately managed to prevent health problems arising from its activities, and uses the expertise of independent occupational health service providers to conduct regular health monitoring programmes. These programmes also include advisory services to employees and managers, thus ensuring appropriate controls are duly identified and implemented to prevent any detrimental impact to any existing health conditions.

Health and Safety Statistics

Of the 610 incidents reported this year (814 in 2019), 65% correspond to equipment or facility damage with no personal injuries (58% in 2019), 23% correspond to personal injuries that were resolved with first-aid treatment (25% in 2019) and the remaining 11% correspond to incidents reported to the relevant authorities and facility inspections. Among the incidents reported there are lost-time injuries, low intensity combustions, spillages or leaks on the ground. All of the incidents were managed and remediated appropriately.

With the focus on safety, the effect of applying the 7 Life Saving Rules, and the internal awareness campaign, close to 3,000 *Near Misses*³ were reported in 2020 (nearly 4,000 in 2019). The existence of reporting and monitoring a significant number of *Near Misses* is an essential tool for the prevention and mitigation of accidents, and an excellent indicator of how the organisation “lives” safety on a daily basis and how important employee safety and providing a safe working environment are for the group (the higher the number of *Near Misses* detected, the lower the number of major accidents, thanks to early detection and prevention⁴).

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

The table below includes the quantitative indicators in terms of health and safety:

³ For the purpose of this report, *Near Misses* correspond to those unplanned or unusual events that may interrupt normal operation and that, by chance or in case they had not been timely identified and managed, may have foreseeably led to injury or property damage.

⁴ Based on “Bird’s triangle” or accident theory (Frank E. Bird, 1969).

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WORK-RELATED INJURIES

	Spain	United Kingdom	United States
Number of fatalities as a result of a work-related injury	0	0	0
Rate of fatalities as a result of a work-related injury ⁵	0	0	0
Number of work-related injuries with major consequences (excluding fatalities)	0	0	3
Rate of work-related injuries with major consequences (excluding fatalities) ⁶	0	0	1
Number of recordable work-related injuries (incl. fatalities)	19	9	19
Rate of recordable work-related injuries ⁷	17	5	9

(¹) Standardisation rate: 10⁶

The main work-related injuries are contusions, cuts, lacerations, muscle injuries, fractures and abrasions.

Coronavirus (COVID-19) crisis management and risk assessment

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

During this crisis, there is a risk to employee health as a result of coronavirus transmission in the workplace. Risk assessments for frontline workers who undertake activities that may risk greater exposure have been developed. Consequently, control measures have been identified to develop the corresponding protocol and guidelines. These include:

- Personal Protective Equipment (PPE)
- Face coverings / face masks
- Social distancing (including working from home whenever it is possible, and adjustments to the workspace/work patterns/procedures to ensure social distancing). This includes the use of virtual solutions for communications with colleagues and co-workers rather than face-to-face meetings.
- Hand hygiene
- Specific hygiene measures in the workplace, common areas, and shared vehicles.
- Travel restrictions
- Communication (i.e., public health information), support and employee training on specific COVID-19 issues.
- Review of ventilation systems and definition of maximum room capacity
- PCR and/or antigens tests for our employees, upon client's request
- Coordination with third parties visiting Tradebe facilities
- "In itinere" recommendations for all employees

⁵ Rate of fatalities as a result of a work-related injury = (Number of fatalities resulting from work-place injuries / number of hours worked) * 10⁶

⁶ Rate of high-consequence work-related injuries with major consequences (excluding fatalities) = (Number of high-consequence work-related injuries with major consequences (excluding fatalities) / numbers of hours worked) * 10⁶

⁷ Rate of recordable work-related injuries = (Number of recordable work-related injuries / number of hours worked) * 10⁶

In Spain and the United Kingdom, recordable accidents are equated to accidents with sick leave.

* In the denominator of the rates, the theoretical hours as per collective agreement have been used.

- Communication of the criteria for following government measures (official symptoms, definition of close contact, quarantine period, self-declarations to allow mobility during lockdowns, etc.)

4.5. Social relationships

Social dialogue at Tradebe is structured differently based on local legislation:

- In Spain social dialogue is conducted through the Legal Representatives of Workers in each company, which is embodied by the Workers' Committees or Delegates.
- In the United Kingdom, the main forum for social dialogue is the Information & Consultation Group (ICG), which is held on a quarterly basis and includes employees from each department. This is where relevant aspects of each workplace are discussed, changes are proposed and important employee issues are addressed. The Health and Safety results are discussed at each ICG and each representative has the opportunity to comment.
In addition, daily production meetings (every morning) and quarterly Health and Safety sessions are held at the plants. In some UK locations, *Coffee Shop* sessions are held, where members of management and employees meet to comment on relevant issues at the plant.
- In the United States, an employee rights poster must be displayed in a visible place in all facilities. The Employee Rights Poster is promoted by the National Labor Relations Board (NLRB) and provides details regarding employee rights, as well as examples of specific activities that are considered illegal for employers and trade unions. The poster also offers resources for employees to understand their rights, as well as mechanisms to take action against employers that breach the National Labor Relations Act (NLRA).

In 2020, 98% of the employees in Spain and 12% of employees in the United States are governed by collective bargaining agreements.

4.6. Training

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

The only irreplaceable capital of the organisation is the knowledge and skills of its employees, which translates into customer service, and group results and growth.

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

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

The organisation needs to retain and increase its quality, and is aware that this can only be achieved in the appropriate context of learning and knowledge management. It is essential not

only to have the right people, but also to train them and develop in them the necessary professional competencies to be able to respond quickly to any need that may arise. The training policy consists of a set of organisational guidelines and procedures that structure and give coherence to the training actions required to cover these needs.

Training contributes substantially to the development of the group and to creating an environment that fosters innovation, which is key to the group's future. In 2020, Tradebe provided more than 32,000 hours of training to its employees on topics such as health and safety, languages, and professional soft skills. The distribution of training hours by professional category is as follows:

TRAINING HOURS BY TOPIC AND PROFESSIONAL CATEGORY						
	Health & Safety	Languages	On the job	Soft skills	Technical skills	Total
Senior Management	1.434	602	71	627	222	2.956
Middle Management	4.312	1.684	741	2.122	304	9.163
Professionals	7.040	495	2.316	758	2.380	12.988
Technicians	709	1.127	122	140	12	2.109
Administration	3.250	365	232	204	443	4.493
Production	87	266	124	165	0	642
Total	16.831	4.539	3.606	4.016	3.361	32.353

4.7. Universal accessibility for people with disabilities

Based on equal opportunities, Tradebe is committed to ensuring, as required by applicable legislation, a work environment that is free from discrimination on the grounds of a person's age, race, nationality, ethnic group, gender, religion or belief, sexual orientation, or disability.

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

4.8. Equality

The corporate Code of Conduct establishes that the diversity of ethnic groups, languages, races, gender, religions, health conditions and cultures is a reflection of the organisation itself. Diversity is especially encouraged, as it ensures proximity to the communities where the group operates and to clients.

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Tradebe is strongly committed to promoting a workplace environment that is free from harassment based on sexual orientation or identity, race, religion, nationality, gender, age, or disability, and any other inappropriate or unlawful action. The group prohibits harassment in any form, whether physical, verbal, or non-verbal. Any instance of alleged harassment will be investigated and may result in disciplinary action or, if proven, dismissal.

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Tradebe's current equality policy is designed to implement the organisation's commitment to equal opportunities. Employees are responsible for making sure that their conduct is in line with expected standards and reflects the commitments set out in the policy.

The Code of Conduct and its underlying equality policy have been introduced in all Tradebe locations and in each case adapted to the corresponding local regulations.

Individual talent is the sole measure of whether a candidate is correct for a role within the organisation, without exception. Through providing equal opportunities and support for employees, we attract and develop employees with the right skills, regardless of gender.

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The group has specific equality and anti-discrimination policies in place, as well as specific procedures for ensuring that the organisation deals with these issues confidentially and as quickly as possible.

4.9. Employee statistics as at 31st December 2020⁸

WORKFORCE DISTRIBUTION BY COUNTRY				
	2020	2020 (%)	2019	2019 (%)
United States	810	34%	966	35%
United Kingdom	888	37%	953	35%
Spain and France	649	27%	717	26%
Oman	5	0%	62	2%
Italy	17	1%	11	0%
Germany	21	1%	16	1%
Total	2.390	100%	2.725	100%

WORKFORCE DISTRIBUTION BY AGE				
	2020	2020 (%)	2019	2019 (%)
<30	325	14%	429	16%
30-39	575	24%	697	26%
40-50	763	32%	819	30%
>50	727	30%	780	29%
Total	2.390	100%	2.725	100%

WORKFORCE DISTRIBUTION BY GENDER AND PROFESSIONAL CATEGORY								
	2020				2019			
	F (%)	M (%)	Total		F (%)	M (%)	Total	
Senior Management	25%	75%	44	2%	20%	80%	46	2%
Middle Management	19%	81%	495	21%	20%	80%	549	20%
Professionals	48%	52%	185	8%	51%	49%	188	7%
Technicians	25%	75%	382	16%	22%	78%	417	15%
Administration	79%	21%	305	13%	80%	20%	307	11%
Production	4%	96%	979	41%	5%	95%	1.218	45%
Total	24%	76%	2.390	100%	23%	77%	2.725	100%

WORKFORCE DISTRIBUTION BY AGE AND PROFESSIONAL CATEGORY										
	2020					2019				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Senior Management	0%	7%	61%	32%	44	0%	26%	46%	28%	46
Middle Management	6%	21%	40%	33%	495	7%	23%	39%	31%	549
Professionals	8%	34%	30%	28%	185	13%	30%	29%	28%	188
Technicians	31%	26%	20%	22%	382	29%	25%	24%	22%	417
Administration	11%	27%	31%	31%	305	13%	25%	28%	34%	307
Production	13%	23%	32%	32%	979	17%	26%	28%	29%	1.218
Total	14%	24%	32%	30%	2.390	16%	26%	30%	29%	2.725

⁸ Including all employees as at 31st December 2020, as well as internships. Yearly average is not reported because the change between total number of employees at the end of the fiscal year and the number of employees as the average of the year is not significant, and the group's activity is not subject to seasonality.

WORKFORCE BY PROFESSIONAL CATEGORY AND TYPE OF CONTRACT

	2020				2019			
	Permanent	Temporary	Other (*)	Total	Permanent	Temporary	Other (*)	Total
Senior Management	44	0	0	44	46	0	0	46
Middle Management	483	11	1	495	532	11	6	549
Professionals	179	6	0	185	182	6	0	188
Technicians	363	17	2	382	395	17	5	417
Administration	289	15	1	305	294	12	1	307
Production	938	39	2	979	1.149	65	4	1.218
Total	2.296	88	6	2.390	2.598	111	16	2.725
Total (%)	96%	4%	0%		95%	4%	1%	

(*) Other: corresponds to interns

WORKFORCE DISTRIBUTION BY PROFESSIONAL CATEGORY AND WORKING HOURS

	2020			2019		
	Full-time	Part-time	Total	Full-time	Part-time	Total
Senior Management	44	0	44	44	2	46
Middle Management	486	9	495	542	7	549
Professionals	176	9	185	177	11	188
Technicians	362	20	382	400	17	417
Administration	262	43	305	262	45	307
Production	963	16	979	1.187	31	1.218
Total	2.293	97	2.390	2.612	113	2.725
Total (%)	96%	4%		96%	4%	

NUMBER OF DISMISSALS BY GENDER AND AGE

	2020					2019					
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	n.d. (*)	Total
Female	21	25	14	23	83	7	5	6	10	2	30
Male	73	67	102	66	308	45	40	42	20	11	158
Total	94	92	116	89	391	52	45	48	30	13	188

(*) information not available

NUMBER OF DISMISSALS BY COUNTRY AND GENDER

	2020			2019		
	Female	Male	Total	Female	Male	Total
United States	20	75	95	23	133	156
United Kingdom	35	106	141	2	11	13
Spain and France	27	76	103	5	12	17
Oman	1	51	52	0	2	2
Total	83	308	391	30	158	188

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AVERAGE REMUNERATION BY PROFESSIONAL CATEGORY AND AGE – SPAIN AND FRANCE (EUR/year)

	2020					2019				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Middle Management	20.917	49.252	50.699	59.818	50.493	20.795	52.825	51.943	61.997	53.296
Female	24.000	41.789	43.827	55.523	42.655	-	46.626	45.752	63.299	47.532
Male	19.889	56.094	53.331	60.161	53.367	20.795	55.537	54.630	61.841	55.236
Pay Gap (F:M) (*)	121%	74%	82%	92%	80%	n/a	84%	84%	102%	86%
Professionals	39.033	40.602	42.661	54.744	43.458	27.940	39.513	43.499	46.402	40.440
Female	21.050	41.028	40.698	42.767	39.480	27.940	37.177	41.998	44.614	38.395
Male	75.000	40.262	46.567	63.727	48.193	-	42.275	48.000	49.979	44.528
Pay Gap (F:M) (*)		102%	87%	67%	82%	n/a	88%	87%	89%	86%
Technicians	18.897	22.863	26.106	31.791	23.801	21.004	25.475	31.782	48.640	28.398
Female	19.368	20.369	20.613	23.428	20.403	19.597	24.009	28.939	-	24.666
Male	18.224	25.000	30.101	36.809	26.831	22.236	27.088	34.368	48.640	31.471
Pay Gap (F:M) (*)		81%	68%	64%	76%	88%	89%	84%	n/a	78%
Administration	17.576	20.471	23.956	25.503	22.439	19.574	22.519	24.614	25.408	23.316
Female	17.682	19.242	23.621	25.503	22.483	18.957	22.755	24.794	25.408	23.655
Male	17.450	23.338	27.976	-	22.229	20.807	21.928	21.820	-	21.537
Pay Gap (F:M) (*)		82%	84%	n/a	101%	91%	104%	114%	n/a	110%
Production	22.549	22.621	23.722	23.979	23.393	21.558	22.723	23.755	24.031	23.298
Female	20.133	22.425	23.438	15.993	21.182	21.567	25.394	24.655	20.723	23.151
Male	22.970	22.634	23.736	24.342	23.531	21.556	22.470	23.723	24.254	23.309
Pay Gap (F:M) (*)	88%	99%	99%	66%	90%	100%	113%	104%	85%	99%

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

	2020					2019				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Middle Management	35.015	52.732	57.400	61.893	57.657	40.473	45.046	57.659	53.923	53.040
Female	-	62.517	57.315	56.065	58.971	-	56.512	51.490	54.639	53.847
Male	35.015	48.538	57.432	62.236	57.351	40.473	40.460	59.874	53.827	52.835
Pay Gap (F:M) (*)		129%	100%	90%	103%	n/a	140%	86%	102%	102%
Professionals	49.458	39.974	44.246	54.611	47.233	36.736	43.976	48.957	51.492	47.734
Female	45.436	39.960	42.565	49.961	43.785	36.031	41.605	52.099	44.885	44.950
Male	65.550	39.993	45.409	56.724	50.081	38.500	47.364	46.077	54.324	50.054
Pay Gap (F:M) (*)		100%	94%	88%	87%	94%	88%	113%	83%	90%
Technicians	25.663	28.258	32.761	36.271	29.486	25.241	29.071	34.937	33.200	29.551
Female	25.389	26.129	29.343	29.537	26.393	23.915	31.286	36.999	29.450	28.729
Male	25.750	29.636	34.005	36.540	30.438	25.714	28.029	34.318	33.799	29.808
Pay Gap (F:M) (*)		88%	86%	81%	87%	93%	112%	108%	87%	96%
Administration	23.629	24.652	25.196	23.897	24.253	22.144	21.603	22.143	22.760	22.324
Female	21.452	24.145	23.145	23.565	23.392	20.259	20.485	21.435	22.514	21.750
Male	26.532	25.285	29.708	25.555	26.310	23.557	23.840	24.622	23.959	23.907
Pay Gap (F:M) (*)		95%	78%	92%	89%	86%	86%	87%	94%	91%
Production	24.788	25.182	25.161	25.824	25.360	23.001	23.589	25.020	24.172	23.997
Female	26.694	24.029	16.099	24.544	22.841	24.054	21.302	23.730	25.086	23.000
Male	24.667	25.235	25.513	25.856	25.458	22.890	23.825	25.105	24.160	24.058
Pay Gap (F:M) (*)		95%	63%	95%	90%	105%	89%	95%	104%	96%

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

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AVERAGE REMUNERATION BY PROFESSIONAL CATEGORY AND AGE – UNITED STATES (\$/year)

	2020					2019				
	<30	30-39	40-50	>50	Total	<30	30-39	40-50	>50	Total
Middle Management	57.436	72.469	95.905	91.323	85.974	61.950	96.562	107.959	114.888	102.924
Female	51.460	71.523	88.533	76.518	77.979	52.958	95.271	107.255	96.051	95.132
Male	58.183	72.729	97.379	93.200	87.432	64.402	96.856	108.123	117.579	104.538
Pay Gap (F:M) (*)		98%	91%	82%	89%	82%	98%	99%	82%	91%
Professionals	50.114	71.699	92.457	107.762	84.225	65.453	82.601	95.196	100.009	91.401
Female	47.794	67.254	91.750	78.017	72.819	63.325	75.927	86.928	82.858	80.704
Male	55.915	75.032	93.007	129.009	94.316	-	88.162	106.771	115.015	102.633
Pay Gap (F:M) (*)		90%	99%	60%	77%	n/a	86%	81%	72%	79%
Technicians	37.704	49.677	55.283	64.087	51.417	-	65.413	78.861	86.556	78.003
Female	38.280	59.060	58.236	96.269	49.594	-	75.138	63.865	93.379	73.323
Male	37.390	47.702	54.964	62.718	51.793	-	64.116	81.588	85.666	78.783
Pay Gap (F:M) (*)		124%	106%	153%	96%	n/a	117%	78%	109%	93%
Administration	33.021	37.863	42.905	43.172	40.815	-	56.762	51.519	62.877	56.447
Female	32.305	36.067	41.986	38.800	38.465	-	-	45.225	-	45.918
Male	38.750	55.225	47.655	59.023	53.474	-	61.518	-	68.281	63.968
Pay Gap (F:M) (*)		65%	88%	66%	72%	n/a	n/a	n/a	n/a	72%
Production	36.705	42.057	44.114	46.847	43.654					
Female	33.488	35.492	-	-	34.490					
Male	37.049	42.549	44.114	46.847	43.908					
Pay Gap (F:M) (*)		83%	0%	0%	79%					

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

AVERAGE REMUNERATION BY PROFESSIONAL CATEGORY AND AGE – OMAN (OMR/year)

	2020				2019			
	<30	30-39	40-50	>50	<30	30-39	40-50	>50
Senior Management	-	-	-	-	-	-	-	-
Middle Management	-	-	-	38.000	-	28.320	-	-
Professionals	-	-	-	-	-	21.640	-	-
Technicians	-	31.200	22.512	27.824	14.560	16.245	15.300	-
Administration	-	-	-	-	16.900	-	-	-
Production	-	-	-	23.348	7.893	8.994	-	-

Note: The pay gap has not been calculated due to low female representation.

AVERAGE REMUNERATION OF DIRECTORS AND EXECUTIVES (SENIOR MANAGEMENT)⁹

	2020			2019		
	Female	Male	Total	Female	Male	Total
SPAIN (€)	114.606	135.900	131.061	133.812	160.386	156.190
UNITED KINGDOM (£)	110.763	144.142	135.797	124.375	128.754	127.781
UNITED STATES (\$)	275.250	370.427	341.874	249.577	281.237	277.280

At the end of 2020, there are 40 employees with some form of declared disability (73 employees at the end of 2019).

⁹ including members of the Board of Directors and the Executive Committee.

5. HUMAN RIGHTS

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

5.1. Management approach

In general, Tradebe is committed to transparency with regards to how employee and stakeholder information is obtained and managed, and that it fulfils all of the requirements established by data protection laws.

Tradebe follows the human rights principles of the United Nations Global Compact.

As a result of equality policies and the application of the Code of Conduct, Tradebe has an inclusive culture with no evidence of human rights breaches by employees or in the supply chain. These policies aim to mitigate the following risks:

- Any breach of respect for human rights.
- Any breach of regulations against slavery and respect for human rights.

The organisation ensures that these risks are monitored and mitigated through the policies described above and specific training. Policies are periodically revised by the Executive Committee.

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

5.2. Human rights policies, results, and risks

The policies, procedures, and measures for preventing and managing potential human rights violations are managed and promoted by the Human Resources Department in coordination with the Executive Committee, both of which consist of qualified personnel. The Human Resources team works closely with the operations and business directors and provide them with the tools and leadership to manage human rights issues and ensure compliance with local regulations.

As at the date of this report, there has been no report of a breach of human rights regulations nor through internal control mechanisms.

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6. FIGHT AGAINST CORRUPTION AND BRIBERY

6.1. Management approach

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

As a general policy, the organisation has reporting systems in place (whistleblowing channel). No incident has been reported in 2020 (or 2019).

6.2. Policies applied by the group to fight against corruption and bribery

In the group, there are three main areas of action with regards to anti-corruption and bribery policies:

- **Code of Conduct and Internal Policies**

Tradebe's commitment to strict compliance with regulations on the prevention and fight against corruption, bribery or any other related matter is clear and unequivocal, applying a zero tolerance policy for non-compliance. The ultimate goal of the organisation is the development and continuous improvement of the core principles set out in the group's Code of Conduct on these and other matters. There is a generic Code of Conduct that has been adapted specifically for each country.

In this respect, the Code of Conduct, which every new employee receives when they join any of the group's companies, establishes a system for resolving problems in the event of any legal breach, providing the employee with guidelines for action and indicating how and to whom they should report the incident. It also highlights the relationship with our commercial partners, suppliers and clients, trying to involve them in our good practices. It also establishes a clear policy about the acceptance or offering of gifts or articles that could be considered a bribe, and not to use these gifts or articles as a way to accept a supplier, close a commercial deal or obtain any other type of undue advantage.

In addition, there are specific internal policies in place that highlight and examine the ideas contained within the Code of Conduct. In the United Kingdom, online training programs have been implemented for those employees who, because of their position, are particularly exposed to this type of actions.

- **Criminal compliance**

The group has been working on the implementation, review and continuous improvement of a criminal compliance programme that aims to monitor, control, supervise, detect and prevent certain criminal offences, including bribery, trading in influence, scams and fraud or money laundering.

Significant progress has been made towards the implementation of this system, which includes a protocol for managing the whistleblowing and internal investigation channel to uncover offences committed by employees, managers and/or collaborators and, where appropriate, become aware of and sanction any infractions that may occur, so that any employee can report these events to the group's Ethics Committee so that it may take the appropriate measures.

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6.3. Policy outcomes

The results of the group's policies on bribery and corruption are fully satisfactory so far, with no reported incidents detected during 2020.

6.4. Risks

The group faces a wide range of corruption and bribery risks that include, among others, facilitation payments and bribery in all its forms, money laundering, conflicts of interest, distortion of market competition, financing of political parties and/or candidates or trading in influence. The consequences of engaging in these bad practices are mainly financial (fines) and reputational.

Due to the volume of contracts group companies have with the public sector, it is relations with the public administration that entail a higher risk factor for the group in terms of bribery and corruption.

In order to mitigate this risk, there is a hierarchical chain of approval or workflow for purchases and sales, that is supervised at all times by the legal departments of the corresponding countries. No payments or purchases are made in cash.

6.5. Measures adopted to prevent corruption and bribery

As indicated in the section above, the group has been working on several levels to prevent corruption and bribery in all their forms by:

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

6.6. Measures to fight money laundering

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

No cases of money laundering have been detected in 2020.

6.7. Contributions to foundations and non-profit organisations

In 2020, Tradebe has made small financial contributions to food banks to help provide food and emergency relief to local communities suffering from food poverty. Funds have been donated to:

- Trussell Trust food bank, in the United Kingdom.
- Federación Española de Bancos de Alimentos (FESBAL), in Spain.
- Indiana Foodbank and Meriden Foodbank in the United States.

6.8. Membership of trade associations

Tradebe is a member of the following industry associations:

- Environmental Services Association (2020 membership fee: 12,500 GBP)
- CT Environmental Forum (2020 membership fee: 200 USD)
- Air and Waste Management Association (no cost in 2020)
- Asociación de Empresas Gestoras de Residuos y Recursos Especiales (ASEGRE) (2020 fee: 6.867 euro)
- Associació Catalana d'Instal·lacions de Tractament de Residus Especials (ACITRE) (2020 membership fee: 5.000 euro)
- ACLIMA, cluster association for eco-industry companies, environmental services and products in the Basque Country (2020 membership fee: 3.045 euro)
- Federación Empresarial Catalana del Sector Químico (FEDEQUIM) (2020 fee: 268 euro)
- Euroshore (2020 fee: 3.000 euro)

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7. SOCIETY

7.1. Management approach

Tradebe is strongly committed to sustainable development and considers both its own social matters as well as those of its clients and suppliers. This principle is considered to be of fundamental importance and has therefore been considered a material aspect of the Non-Financial Information Statement.

7.2. Commitment to sustainable development

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

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

Tradebe's commitment to sustainable development was particularly evident in the COVID-19 pandemic, during which the group has continued to provide essential services, to ensure the health of its clients and the business it serves.

7.3. Outsourcing and suppliers

All purchases related to production are carried out in compliance with the industry's legal requirements and good practices, including respect for human rights, gender equality and the environment, in accordance with existing regulations in the sector.

Environmental issues are also taken into account in the organisation's purchase policy. For example, the company car policy establishes a limit on CO₂ emissions that prohibits the purchase or rental of vehicles that emit more than 160 grams of CO₂.

For more than three years, the organisation has only invited tenders from suppliers that can guarantee that the energy comes from renewable sources, and includes certificates of origin.

7.4. Clients

Despite not being in contact with the final consumer, Tradebe's business focuses on protecting the health and safety of its clients and, indirectly, that of the end user.

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

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7.5. Tax information

Tradebe maintains its commitment to economic, social, and industrial development through strict compliance with the tax regulations that exist in each territory where it operates. Taxes generated by its operations are declared and liquidated with the corresponding authorities.

The group does not operate in territories classified as tax havens. In the event of any commercial operations with third parties domiciled in such territories, they would be carried out as in any other territory and as part of the regular operations of the group.

Tradebe's tax policy is guided by the tax legislation that is in force in each territory and any doubts regarding this matter or related to operations that may have a significant fiscal impact are previously consulted with recognised independent tax advisors.

The table below summarises (in thousands of euros) the aspects relating to tax information as required by Law 11/2018 on non-financial information and diversity:

<i>(Thousand euro)</i>	2020						Total
	Spain	United States	United Kingdom and Oman	Italy	Germany	Consolidation Adjustments	
Profit (loss) from continuing operations	24.346	-16	3.703	-1.282	-1.836	-8.653	16.262
Operating subsidies related to profit (loss)	195	0	1.047	0	0	0	1.242
Allocation of fixed asset subsidies	34	0	0	0	0	0	34

In 2020, the group paid a total of 2,053 million euro in corporate tax¹⁰.

¹⁰ Including the liquidation of 2019 corporate tax and advance payments of 2020 tax.

APPENDIX I - COMPANIES INCLUDED IN THE CONSOLIDATED FINANCIAL STATEMENTS

The scope of consolidation includes the following companies:

EUROPE

SPAIN

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

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UNITED KINGDOM

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

FRANCE

- TRADEBE SARL

PORTUGAL

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

GERMANY

- TRADEBE GmbH

ITALY

- TRADEBE CHIMICA SRL

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AMERICA

USA

- AARON OIL COMPANY, LLC (AOC), formerly known as AARON OIL COMPANY, INC
- INTERNATIONAL HYDROCARBON SERVICES, LLC
- NORLITE, LLC (NORLITE)
- TRADEBE CAPITAL CORPORATION (TCC)
- TRADEBE ENVIRONMENTAL SERVICES, LLC (TES, LLC)
- TRADEBE INDUSTRIAL SERVICES, LLC (TIS)
- TRADEBE TRANSPORTATION LLC
- TRADEBE TREATMENT AND RECYCLING, LLC (TTR)
- TRADEBE TREATMENT AND RECYCLING NORTHEAST, LLC (TTR NORTHEAST)
- TRADEBE TREATMENT AND RECYCLING OF BATON ROUGE, LLC (TTR BATON ROUGE)
- TRADEBE TREATMENT AND RECYCLING OF BRIDGEPORT, LLC (TTR BRIDGEPORT)
- TRADEBE TREATMENT AND RECYCLING OF NORTHBOROUGH, LLC (TTR NORTHBOROUGH)
- TRADEBE TREATMENT AND RECYCLING OF STOUGHTON, LLC (TTR STOUGHTON)
- TRADEBE TREATMENT AND RECYCLING OF TENNESSEE, LLC (TTR TENNESSEE)
- TRADEBE TREATMENT AND RECYCLING OF WISCONSIN, LLC (TTR WISCONSIN)

COLOMBIA

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

ASIA

OMAN

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

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And the Spanish temporary business associations (UTEs) listed below, which have been included in the Annual Accounts of each individual company:

- INTRAVAL - CGS
- INTRAVAL - M.J. GRUAS (TÁRREGA)
- INTRAVAL - DISSENY I SOSTENIBILITAT - CONSTRUCCIONES CALER
- ECOPROGES - INOCSA (RESIDUS)
- TECNOAMBIENTE - PUERTO DE BARCELONA
- TECNOAMBIENTE - GISA (MALAGA - 2)
- TRADEBE, S.A. - BOTAMAVI - URBASER (MARPOLGAL)
- INGENIERIA CREATIVA PITA, S.L. TECNOAMBIENTE S.L UTE
- INGENIERIA CREATIVA PITA, S.L. - TECNOAMBIENTE, S.L II UNION
- TECNOAMBIENTE- ESTUDIO IMAT IBIZA UNION TEMPORAL DE EMPRESAS
- TECNOAMBIENTE S.L – MC VALNERA S.L UTE

Handwritten signatures and initials in blue ink, including a large stylized signature and the initials 'ML' and 'o'.

APPENDIX II – CONTENTS AND RELATION TO GRI STANDARDS

Information requested by Law 11/2018	Materiality	Page number	Reporting criteria: Selected GRI (2018 version, unless otherwise indicated)
Brief description of the business model including business environment, organisation, and structure	YES	Pg. 3 Pg. 5-8	GRI 102-2 GRI 102-7
Markets served	YES	Pg. 4	GRI 102-3 GRI 102-4 GRI 102-6
Objectives and strategies of the organisation	YES	Pg. 13	GRI 102-14
Main factors and trends that may affect future evolution	YES	Pg. 14-16	GRI 102-14 GRI 102-15
Reporting framework used	YES	Pg. 10	GRI 102-54
Materiality principal	YES	Pg. 11	GRI 102-46 GRI 102-47
Environmental matters			
Management approach: description and outcome of policies, as well as the main risks related to these matters and to the group's activities	YES	Pg. 17	GRI 102-15 GRI 103-2
Detailed information			
Detailed information on current and foreseeable effects of the company's activity on the environment and, if applicable, on health and safety.	YES	Pg. 21	GRI 102-15
Environmental assessment or certification procedures	YES	Pg. 18-20	GRI 103-2
Resources devoted to environmental risks prevention	YES	Pg. 18	GRI 103-2
Precautionary principle	YES	Pg. 22	GRI 102-11
Amount of provisions and guarantees for environmental risks	YES	Pg. 22	GRI 103-2
Pollution			
Measures to prevent, reduce or remedy emissions, taking into account specific atmospheric pollution, including noise and light pollution.	YES	Pg. 26-28	GRI 103-2
Circular economy and waste prevention and management			
Prevention measures, recycling, reuse and other forms of waste recovery and disposal	YES	Pg. 23-25,26	GRI 103-2 GRI 306-2 GRI 306-3 (2020) GRI 306-4 (2020) GRI 306-5 (2020)
Actions to prevent food waste	No relevant impact exists due to the group's activity		GRI 103-2
Sustainable use of resources			
Water consumption and water supply in accordance with local constraints	YES	Pg. 25	GRI 303-5 (2018)
Consumption of raw materials and measures to improve efficiency of their use	YES	Pg. 21 and 26	GRI 301-1 GRI 301-2

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Information requested by Law 11/2018	Materiality	Page number	Reporting criteria: Selected GRI (2018 version, unless otherwise indicated)
Direct and indirect energy consumption	YES	Pg. 25	GRI 302-1
Measures taken to improve energy efficiency	YES	Pg. 21	GRI 103-2
Use of renewable energy	YES	Pg. 25	GRI 302-1
Climate change			
GHG emissions generated as a result of the company's activities, including the use of goods and services it produces	YES	Pg. 27	GRI 305-1 GRI 305-2
Measures adopted to adapt to the consequences of climate change	YES	Pg. 26	GRI 103-2
Voluntary medium and long-term targets to reduce GHG emissions, and the measures implemented to achieve them	YES	Pg. 26	GRI 305-5
Biodiversity protection			
Measures taken to preserve or restore biodiversity	YES	Pg. 28	GRI 304-3
Impact arising from group's activities or operations on protected areas	YES	Pg. 14	GRI 304-2
Social and employee matters			
Management approach: description and outcome of policies, as well as the main risks related to these matters and the group's activities	YES	Pg. 28	GRI 102-15 GRI 103-2
Employment			
Total number and distribution of employees by country, gender, age, and professional category	YES	Pg. 36	GRI 102-8 GRI 405-1
Total number and distribution of contract type and average annual number of permanent, temporary and part-time contracts, by gender, age, and professional category	YES	Pg. 37	GRI 102-8
Dismissals by gender, age, and professional category	YES	Pg. 37	GRI 103-2
Average remuneration and evolution by gender, age, and professional category or equal value	YES	Pg. 38-39	GRI 103-2 GRI 405-2
Gender pay gap, the remuneration of equal jobs, average remuneration in the company	YES	Pg. 38-39	GRI 103-2 GRI 405-2
Average remuneration of directors and executives, including variable remuneration, allowances, indemnities, and contributions to any long-term savings schemes, and any other payments by gender.	YES	Pg. 39	GRI 103-2 GRI 405-2
Implementation of work disconnection policies	YES	Pg. 30	GRI 103-2
Number of employees with disabilities	YES	Pg. 39	GRI 405-1
Work organisation			
Organisation of working hours	YES	Pg. 30	GRI 103-2
Number of hours of absence	YES	Pg. 30	GRI 403-9 (2018)
Measures targeting work-life balance and promoting joint parental responsibility	YES	Pg. 30	GRI 103-2
Health and Safety			

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Information requested by Law 11/2018	Materiality	Page number	Reporting criteria: Selected GRI (2018 version, unless otherwise indicated)
Health and Safety in the workplace	YES	Pg.30-33	GRI 103-2 GRI 403-1 al GRI 403-3 GRI 403-7 (2018)
Work-related injuries, frequency, and severity as well as work-related illnesses, by gender	YES	Pg. 32	GRI 403-9 (2018) GRI 403-10 (2018)
Social relationships			
Social dialogue including procedures for informing, consulting and negotiating with employees	YES	Pg. 33	GRI 103-2
Percentage of employees covered by collective bargaining agreements	YES	Pg. 33	GRI 102-41
Balance of collective bargaining agreements, especially for health and safety in the workplace	YES	Pg. 33	GRI 403-4 (2018)
Training			
Training policies implemented	YES	Pg. 34	GRI 103-2 GRI 404-2
Number of training hours by professional category	YES	Pg. 34	GRI 404-1
Integration and universal accessibility for people with disabilities			
Integration and universal accessibility for people with disabilities	YES	Pg. 34	GRI 103-2
Equality			
Measures to promote equality and opportunities for women and men	YES	Pg. 35	GRI 103-2
Equality plans, measures to promote employment, protocols to prevent sexual and gender harassment	YES	Pg. 35	GRI 103-2
Anti-discrimination policy and, where applicable, diversity management policy	YES	Pg. 35	GRI 103-2
Human Rights			
Management approach: description and outcome of policies, as well as the main risks related to these matters and to the group's activities	YES	Pg. 40	GRI 102-15 GRI 103-2
Measures to protect human rights and prevent the risk of human rights abuses and where applicable, measures to mitigate, manage and redress possible abuses committed	YES	Pg. 40	GRI 102-16 GRI 102-17
Complaints for human rights violations	YES	Pg. 40	GRI 103-2 GRI 406-1
Measures to promote compliance with the International Labour Organisation core conventions related to freedom of association, the right to collective bargaining, the elimination of discrimination in the workplace, the eradication of forced labour and the abolition of child labour.	YES	Pg. 40	GRI 103-2

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Information requested by Law 11/2018	Materiality	Page number	Reporting criteria: Selected GRI (2018 version, unless otherwise indicated)
Fight against corruption and bribery			
Management approach: description and outcome of policies, as well as the main risks related to these matters and to the group's activities	YES	Pg. 41	GRI 102-15 GRI 103-2
Measures to prevent corruption and bribery	YES	Pg. 42	GRI 103-2 GRI 102-16 GRI 102-17
Measures to prevent money-laundering	YES	Pg. 42	GRI 103-2 GRI 102-16 GRI 102-17
Contributions to foundations and non-profit associations	YES	Pg. 43	GRI 102-13 GRI 201-1
Information on society			
Management approach: description and outcome of policies, as well as the main risks related to these matters and to the group's activities	YES	Pg. 44	GRI 102-15 GRI 103-2
Company's commitment to sustainable development			
Impact of the group's activity on local employment and development	YES	Pg. 44	GRI 103-2
Impact of the group's activity on local communities and in the territory	YES	Pg. 44	GRI 413-1 GRI 413-2
Relations with local community and the forms of dialogue	YES	Pg. 44	GRI 102-43 GRI 413-1
Association and sponsorship activities	YES	Pg. 43	GRI 103-2
Subcontractors and suppliers			
Integration of social, gender equality and environmental matters in purchasing policy	YES	Pg. 44	GRI 103-2
Consideration of social and environmental responsibility in the group's relations with subcontractors and suppliers.	YES	Pg. 44	GRI 102-9
Monitoring and audit systems and results	YES	Pg. 44	GRI 102-9
Consumers			
Measures related to the health and safety of consumers	As the group does not deal with the end consumer, there is no relevant impact regarding this matter.		GRI 103-2
Customer complaint systems, complaints received and resolution			GRI 103-2
Tax Information			
Profit (loss) by country	YES	Pg. 45	GRI 207-4 (2019)
Corporate tax paid	YES	Pg. 45	GRI 207-4 (2019)
Public subsidies received	YES	Pg. 45	GRI 201-4

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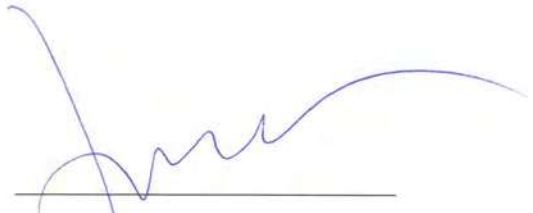
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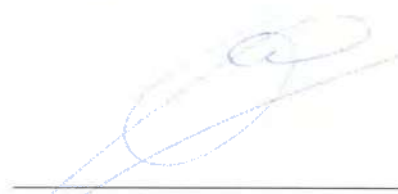
The Group's Non-Financial Information Statement has been approved for issue in Ziórbena on 25th March 2021.




Mr. José Creixell Sureda
(President)



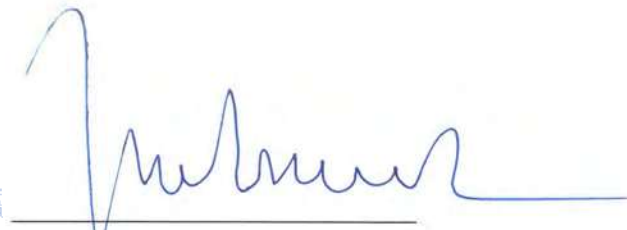
Mr. Victor Creixell de Vilallonga
(Board member)



Mr. Oscar Creixell de Vilallonga
(Board member)



Ms. Maria Creixell de Vilallonga
(Board member)



Mr. Jordi Creixell Sureda
(Secretary and Board member)