# Non-Financial Information Statement (NFIS)

haizea windgroup

Sustainability report

Financial year 2024



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## O. Letter from the Chairman/CEO

SIf I had to define 2024 in one word, I would choose growth. Because we have grown in productive capacity, in people and technological capacity. **Haizea Wind Group** is a leading manufacturer in Europe and a world leader in the manufacture of wind turbine towers. All thanks to the work and effort of those who are part of this project and to the way they face up to the many challenges that we have encountered, which have been many. Below I will summarise in a few lines what has been a year of consolidation for the Group.

From last year, we need to highlight a relevant milestone: the end of the construction and commissioning of our new monopile factory at Haizea Bilbao, which positions us as a major global player. The facility required an investment of more than 250 million euros and production began there in January 2024 manufacturing the first 20 monopiles for East Anglia 3 (Scottish Power) and confirming it as the European benchmark for XXL monopile factories. The foundation factory is a significant expansion of our production capacities in Bilbao, allows us to diversify our customer portfolio and strengthens our position as a flagship group in the global wind industry. In six years, Haizea Wind Group has gone from being a dream to being a wind industry leader.

If we take a tour of the other group plants, we will see that 2024 was particularly challenging for Haizea Tecnoaranda and Haizea Grupo WEC due to the problems that our customers, the wind OEMs, are experiencing, especially in the onshore wind sector (GE, SGRE, Vestas). Delays in processing the paperwork for new wind farms, manufacturer profitability problems and delays in marketing some models, such as the SG5x, have affected us directly. The resilience of our work and the commitment of our team have helped us to navigate these challenges and maintain the Group's profitability and sustainability.

We also experienced the difficulties that Argentina is facing as a country, which will lead to its wind market disappearing by 2025. The situation and governmental decisions have led to the local wind market disappearing since July 2024. That situation has forced us to make the difficult decision to sell our factory there to our partner Sica so that they can use the facilities for their traditional business. At the same time, we have

welcomed more than 40 Haizea Sica employees at the Bilbao factory and they have reinforced our production capacity in the Port of Bilbao.

PElsewhere, we celebrated the return of production to our facility in Breizh, France, to produce the Le Tréport and Noirmoutier projects.

I don't want to end this letter without dedicating a few words to our colleague Raúl, wishing him a fast recovery from the major accident he had at work last June. That accident reminds us that we are in a risky industrial environment and has strengthened our determination to improve the safety of our employees, customers and subcontractors. Safety is and will remain a top priority for **Haizea Wind Group**.

Finally, I would like to note that this year we have been working on strengthening our structure and good corporate governance. We have set up committees (Strategy, Appointments and Compensation, Auditing and Compliance), simplified the corporate structure and improved our financial ratios.

In conclusion, 2024 has been a year of evolution and adaptation for **Haizea Wind Group**. Despite the challenges, we have demonstrated our ability to innovate, expand and remain steadfast in our desire to lead the European wind industry. Therefore, we would like to thank our employees, their families, the customers who trust our work, the Board of Directors and our shareholders.

Eskerrik asko guztioi.

Dámaso Quintana Pradera

Chairman

Borja Zárraga Suárez

CEO



## 1. Introduction

This Non-Financial Information Statement is part of the Consolidated Management Report of Haizea Investments and subsidiaries (hereinafter, Haizea Wind Group, HWG or the Group) and includes information on environmental, social and governance issues as well as personnel, society, respect for human rights and the fight against corruption and bribery. The content to be included in the Non-Financial Information Statement was prepared in accordance with the requirements established by Law 11/2018, of 28 December, amending the Commercial Code, the consolidated text of the Capital Companies Act approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Account Auditing, regarding non-financial information and diversity.

This Non-Financial Information Statement, which refers to the financial year ending 31 December 2024, has been prepared in accordance with the European Commission non-financial reporting guidelines (2017/C215/01) resulting from Directive 2014/95/EU and, to the extent possible, using the Global Reporting Initiative Standards (GRI Standards), in accordance with the information identified in the "Reference table of requirements of Law 11/2018 NFI and contents of the Global Reporting Initiative (GRI indicators)". We have considered a number of variables to identify which topics are important and should be reported. The main ones are:

- The importance of such matters or indicators, both internally for the Group and externally for its stakeholders.
- The business sector to which the Group belongs, taking as the reference the major non-financial aspects contained in the Global Reporting Initiative Standards.

The financial and non-financial data presented in this report are consolidated and refer to the business engaged in by the Group in the period between 1 January and 31 December 2024. The information contained herein referring to financial year 2023 is presented for the purposes of comparison with the information on financial year 2024. In this regard, the Group has not been forced to restate any information from previous years.

The companies included in this report are listed below:

- Haizea Investments, S.L.
- Haizea Wind Group Management, S.L.U.
- Haizea Bilbao, S.L.
- Haizea Breizh, S.A.S.U.
- Haizea Tecnoaranda, S.L.
- Haizea Grupo WEC includes the following companies:
  - Sociedad de Cartera Zestoa, S.A.
  - Haizea WEC Fundición, S.L.
  - · Haizea WEC Mecanizado, S.L.
  - WEC Business and Technology Center, A.I.E.
  - Haizea WEC Tratamiento Superficial, S.A.
  - Conecta Logistics & Engineering, S.L.

The indicators included in section "5. Information on environmental issues" correspond to the following companies, which are the ones engaged in production: Haizea Bilbao, S.L., Haizea Tecnoaranda, S.L. and Haizea Grupo WEC (in this case, only the companies Haizea WEC Fundición, S.L., Haizea WEC Mecanizado, S.L. and Haizea WEC Tratamiento Superficial, S.A.)



## 2. Business model

### 2.1. About us

#### Haizea Wind Group is proactivity and commitment.

We are an industrial group dedicated to the wind power industry, based in Bilbao, Spain. Our activity focuses on the design, manufacture and assembly of large metal structures and cast components for wind turbines.

Wind energy is a global resource that requires global solutions, a demand that we at **Haizea Wind Group** understand and to which we wholeheartedly respond with our products. The Group's different business units allow us to offer our customers value-added solutions.

Powered by a group of experienced professionals and following the needs of our customers, at **HWG** we are creating a global footprint with new facilities around the world. We are continuing our ambitious expansion plan, to become the next global supplier.





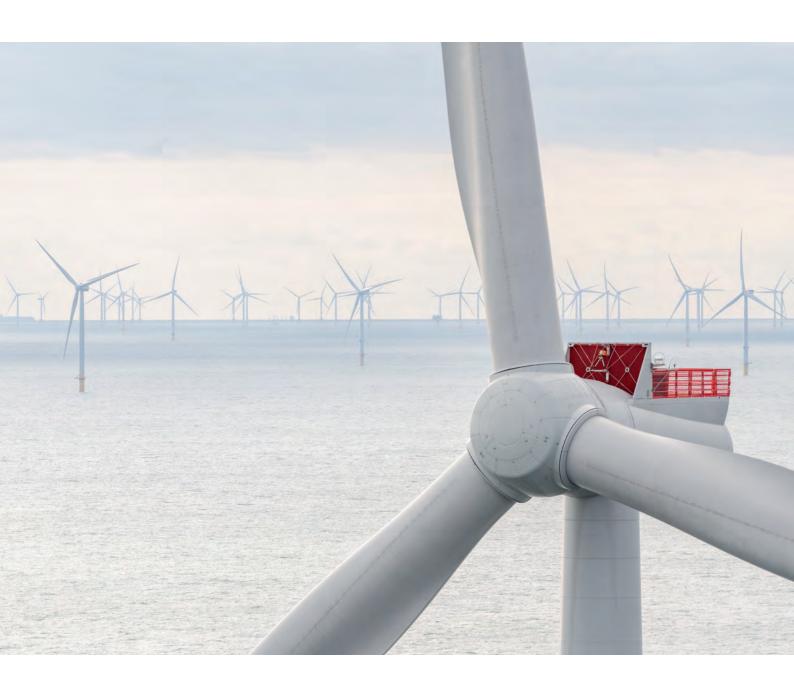
## Mission, vision and values

## **Mission**

To add value to shareholders and society by designing and manufacturing metal structures and to support the fight against climate change by manufacturing and integrating large industrial components for the onshore and offshore wind industry.

## **Vision**

To become the benchmark European manufacturer of large wind turbine components, the leader of the XXL offshore industry. Haizea aspires to be a point of reference for product size, production safety, sustainability and profitability.



#### **Values**



#### Health and safety.

At Haizea, we are committed to the physical and psychological well-being of our people, contractors, suppliers, customers and partners.



#### Caring for people.

We will go as far as our people take us. The people who are part of Haizea are our key asset and the basis of our success. Which is why we are committed to their well-being and personal and professional development, in a safe, sustainable environment. We encourage creativity and idea generation through teamwork, respecting diversity in an environment of trust that allows us to grow as people and as a company.



### Social and environmental commitment.

Haizea is on the front line in action against climate change, demonstrating a firm commitment to our world's sustainability. We assume our responsibility for creating safe, sustainable surroundings that respect society and the environment.



#### **Continuous improvement.**

Every day we strive to anticipate the future needs of the places we operate. Which is why we work to be more efficient in our business, more effective in our performance, more sustainable and profitable.





#### Result oriented.

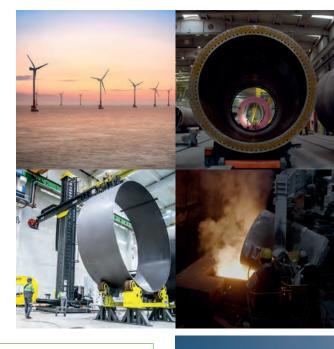
We must fulfil our commitments to our customers, partners, employees and subcontractors.

Therefore, we are committed to safety, deadlines, quality and financial results that bring a positive return to our investors as well as stable, sustainable growth to our industrial business.



## 2. 2. Business lines

In the Group we have three main business activities: wind towers (onshore and offshore), offshore foundations and large castings (onshore and offshore), covering in this way a significant part of the total **wind power supply chain.** 



Castings | haizea grupo wec

2 facilities 40,000 tonnes/year Since 2005

**Onshore towers** 

haizea tecnoaranda

1 facility | 1,900 sections/year | Since 2009

Offshore towers, TP & foundations

haizea bilbao **haizea** oreizh

2 facilities | 193,000 tonnes/year

| Since **2018** 

## Offshore foundations

At **HWG**, with the expansion of our factory in Bilbao, we are extending our industrial know-how into the offshore foundation market while diversifying our products and types of customers (wind farm developers, utilities).

In 2022, after signing the contract with Ørsted, a Danish multinational renewable energy company, an investment of more than 250 million euros was approved, which has allowed us to double the capacity of the Bilbao factory and become the benchmark factory for the monopiles (underwater foundations) that the market will demand in the coming years. The Hornsea 3 wind farm, located off the coast of the United Kingdom, for which we are manufacturing and supplying the foundations,

will have a capacity of 2.9 GW and is expected to be completed by the end of 2027.

In addition, Haizea Wind Group obtained a 35 million euro green loan from the EIB (European Investment Bank) in 2024. This loan will partially finance the project to expand the Haizea plant in the port of Bilbao, which will allow us to implement advanced manufacturing technologies, automate and digitise processes, and progress with research and development as applied to the manufacture and assembly of large metal structures for wind turbines, such as wind towers, monopile foundations and transition pieces for offshore wind farms.

## **Wind towers**

We meet our customers' needs thanks to our stateof-the-art facilities for onshore and offshore wind towers.

The extremely efficient layout of our factories gives our customers the highest quality products in the shortest delivery times. Their production capacities have been increased to cover the current and future dimensions of both offshore and onshore towers.

When it comes to onshore towers, we assist our customers in strategic markets around the world, providing them with comprehensive support while maintaining the highest quality standards.

## Large castings

We manufacture large cast components for wind turbines for both onshore and offshore wind farms. We have integrated a large part of the business chain into our capabilities, from the casting process (foundry unit in Agurain, Spain) to customer delivery logistics (logistics centre in Pamplona, Spain), and even the machining, surface treatment and assembly processes (facility in Itziar-Deba, Spain).

All these capabilities and a committed specialist team are what allow us to develop the following products:

- Hubs for turbines. From 15 Tn to 45 Tn and from 3MW to 8MW, we produce hubs for wind turbines that are up to 5 metres in diameter.
- Main frames. From 11 Tn to 53 Tn and from 3MW to 11MW. We manufacture main frames up to 5.5 m long and 4.5 m wide.



- Main shafts. From 15 Tn to 44 Tn and from 4MW to 15MW, sand or shell casting.
- **Main bearing housing.** From 14 Tn to 49 Tn and from 4 MW to 15 MW.

## Suction sail project at Haizea Tecnoaranda

Haizea Tecnoaranda has an industrial partnership with the technology company Bound4blue in its project to develop suction sails for large ships.

These are rigid sails that play a leading role in the renewable transition of maritime transport, by taking advantage of the strength of the wind.

The International Maritime Organisation has already implemented regulations requiring shipowners and operators to use cleaner fuels and apply energy efficiency measures. These suction sails are therefore expected to revolutionise maritime navigation in the coming years, playing a key role in the decarbonisation of naval logistics, which moves approximately 90% of the world's cargo.

As a result of this partnership with Bound4blue, in 2023 Haizea Tecnoaranda started to manufacture the first prototype rigid sails, becoming the first company in Europe to industrialise the process. The role Haizea Tecnoaranda plays in this process is to manufacture the structure, as well as integrate and assemble the subsystems required for the sails to operate.

The project reinforces the Group's commitment to environmentally sustainable businesses related to wind power.



## 2. 3. Establishment of the Group

Creation of the Group. May The joint venture between Haizea Wind Group and SICA Metalúrgica, S.A. results 2018 in the opening of a manufacturing plant. **February** Location: Santa Fe, Argentina Product: Onshore towers Employees: 85 Total investment: €15 M A new production centre opened in a strategic location. 2018 May Location: Bilbao, Spain Product: Wind towers Employees: 275 Total investment: €65 M Haizea Wind Group acquires 80% of Grupo WEC. 2018 **December** Location: Itziar Deba and Agurain, Spain Product: Hubs, shafts and frames Employees: 270 2019 Haizea Wind Group acquires 92.6% of Tecnoaranda. **November** Location: Aranda de Duero, Spain Product: Onshore towers Employees: 330 Total investment: €74 M 2021 Because of our involvement in the Saint Brieuc, Le Tréport and Noirmoutier offshore wind farms, Haizea Wind Group establishes a new company in Brittany, July France.. Location: Brest, France. Product:offshore Wind towers. 2023 Start of construction of the new offshore foundation plant in the port of Bilbao. **January** Start of production of the first East Anglia 3 XXL monopile project (Scottish 2024 Power). January 2024 In 2024, Haizea Wind Group transferred its stake to its partner Sica Metalúrgica. **December** 



## 2. 4. Key figures and milestones for FY 2024

## Key figures<sup>1</sup>









1,400+
Professionals

82% International sales €371 M+

Turnover Ef

**€46 M+**EBITDA

We continue to grow year after year. In FY 2024 we increased our turnover by 32%, EBITDA by 57% and the number of our professionals by 8%.

## **Key milestones**

Q2	) Commissioning of our new monopile factory in Bilbao.	
July	Haizea Wind Group manufactures the first monopile at its new plant. It will be shipped to the ScottishPower Renewables East Anglia THREE OWF, which will be the second largest wind farm in the world when it comes online in 2026.	
August	<ul> <li>Haizea Grupo WEC becomes the first supplier approved by Vestas for the deliver of the V236 KeyShaft, with a stake in the He Dreiht and Baltic Power projects.</li> <li>Haizea Bilbao signs a 35 million euro green loan with the EIB to boost the European manufacture of wind components.</li> </ul>	у
September	Haizea Wind Group joins the Net Zero Coalition included in the United Nations Global Compact, demonstrating its commitment to the environment and to seeking to reduce greenhouse gas emissions as much as possible.	
November	Haizea Wind Group becomes the sixth member of the Offshore Wind Foundation Alliance (OWFA).	S
December	) In FY 2024, Haizea Wind Group sold its stake to Sica Metalúrgica.	

## 2. 5. Haizea Wind Group around the world



## **Castings**





**Haizea Grupo WEC** (Machining and coating).

Deba (Spain)



Casting. Agurain (Spain)





Logistics. Navarre (Spain)



Machining. Zaragoza (Spain)

## **Towers & Foundations**



tecnoaranda







Haizea Bilbao Bilbao (Spain)



Haizea Tecnoaranda Aranda de Duero (Spain)



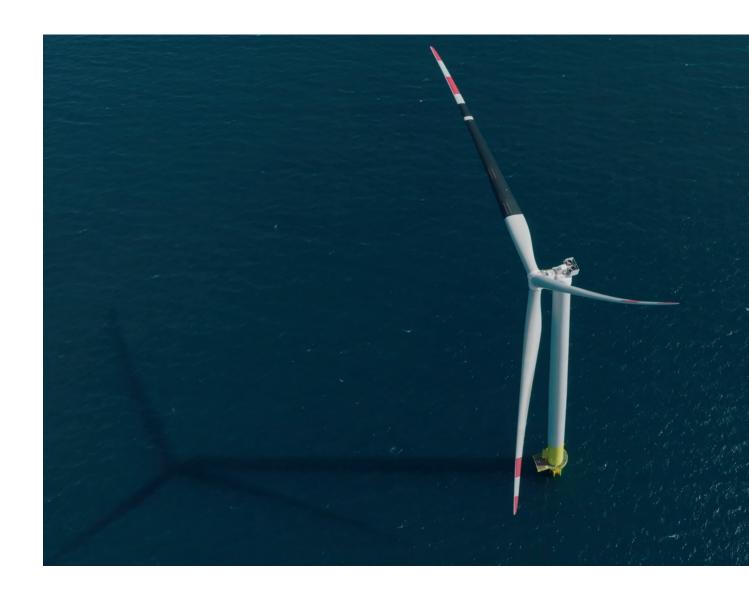
**Haizea Sica** Santa Fé (Argentina)



**Haizea Breizh** Brest (France)



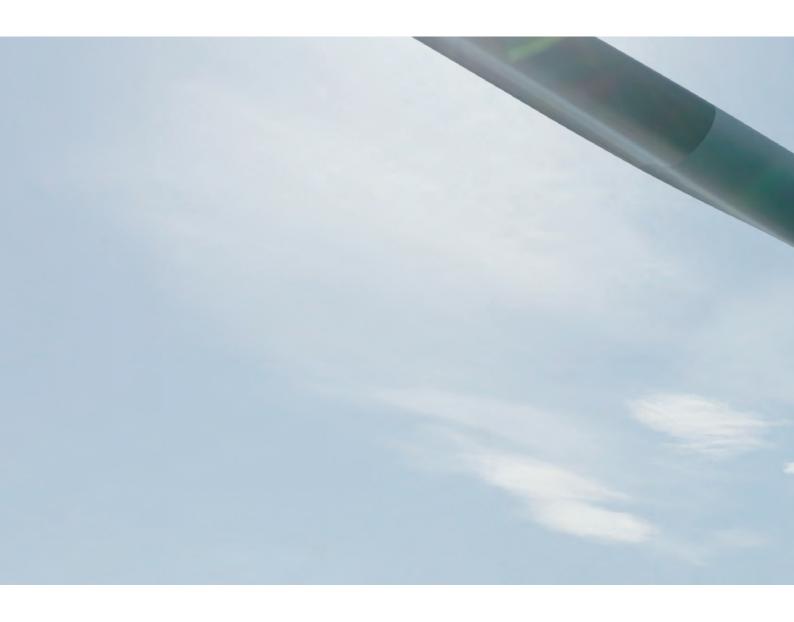
# 3. Identification of key risks and opportunities



The Group's Management regularly identifies the risks and opportunities for a series of different processes: strategy and planning, improvement management, quality management, environmental management, talent management, product engineering, purchasing and logistics management, maintenance, production, information systems, sales, controlling, financial, health and safety management and project management.

In 2024, the risk management policy was approved by the Audit Committee and the Group's Board of Directors. It identifies the people and bodies in the organisation to monitor and follow up on corporate risks. The Board of Directors also approved the corporate risk map, which will be reviewed every six months by the Audit Committee and annually by the Board of Directors.





In relation to the financial risks for FY 2025, an internal financial reporting control system was designed and implemented.

The Group is making progress on its cybersecurity master plan, subcontracting a new Chief Systems Officer (CISO) in 2024. In addition, a consultancy firm was hired to develop the internal audit role and its first conclusions are scheduled for the first half of 2025.

Furthermore, at the monthly meetings of the Executive Committee the operational results achieved and the forecasts for the following month are discussed, as well as any other factor that could impact the budgets for the coming months.

During these meetings, a comprehensive review of the market situation, competitors, suppliers, customers and personnel is conducted.

We periodically undertake a market analysis in which a general review is conducted of the key players in the value chain, investments being made in the business worldwide, the profitability of the key OEMs (original equipment manufacturers) in the market in recent years and the expected market demand in the coming years in each territory. This makes our strategic actions agile and allows us to know how to adapt appropriately to the market.

Along the same lines, we conduct a SWOT analysis (Strengths, Weaknesses, Opportunities and Threats)



in which we examine the Group's situation, analysing both its internal and external characteristics. It should be noted that the main market opportunities we have identified are associated with investment/ growth arising from the industry's reorganisation. In addition to the Group's SWOT, we have specific matrices for the main businesses, which makes it easier for us to respond faster and in a manner more in line with each company's real situation.

In addition, each of the main companies that make up the Group has its own business plan for 2025-2028, which allows us to oversee and monitor the evolution of the KPIs, both financial and non-financial, in all the businesses and establish specific actions if necessary.

The most significant business risks include dependence on key customers, difficulty in attracting and retaining specialist talent, dependence on key personnel and the absence of a succession plan, risk from competitors (new entrants, market aggressiveness) and the influence of macroeconomic and geopolitical factors (wars, pandemics, health crises), especially in the industry in which we operate, forcing us to be very flexible and to adapt to market cycles.

The following sections describe the risks to **Haizea Wind Group** identified in the areas of the environment, social and personnel issues, respect for human rights, the fight against corruption and bribery, and relations with major stakeholders.



## 4. Materiality analysis

The Non-Financial Information Statement allows **Haizea Wind Group** to make data available to its stakeholders relating to FY 2024 on matters that, while not being of a financial nature, are of special significance to the Group.

The most important stakeholders considered are those listed below:

- Shareholders/Senior Management.
- · Employees.
- Customers.
- Subcontractors/Suppliers.
- Financial institutions.
- Government departments.

The Group has set up special communication channels with its stakeholders, through which it can learn about their needs and expectations.

For each stakeholder group, strategic, economic, environmental, social and management system objectives have been set that have been monitored and will be updated in subsequent strategic reflections, which will again be based on an analysis of the Group's internal and external context and will have as the key lever Corporate Social Responsibility and sustainability.

In this regard, to define the most significant sustainability issues for the current period, Management has conducted an analysis including: issues from the previous strategic reflection that are pending or yet to be implemented, our stakeholders' expectations, and benchmarking of competitors and regulatory trends, so as to come to an agreement on the key issues found in the

joint evaluation. As a result of these analyses, 58 material issues have been identified for evaluation, divided into three categories: Environmental, Governance and Social. The most important in terms of external and internal significance are the following:

- Occupational health and safety.
- Ethics and Compliance.
- Customer satisfaction and the relationship of trust with them.
- Attraction and retention of specialist talent.
- Employee well-being (work-life balance, work environment, fair pay).
- Product quality and safety.
- · Climate change.
- · Waste/Circular economy.

Strategic, economic, environmental, social and management system objectives have been set and are being monitored and will be updated in subsequent strategic reflections.





Management has implemented, or is in the process of implementing, measures in all the above-mentioned areas, which are described in this document. Work is also being done on the development of corporate policies regulating the Group's actions in these areas, such as the Environmental and Sustainability Policy and the Corporate Social Responsibility, Ethics and Conduct Policy.

In 2024, numerous compliance milestones were met, mainly stemming from the appointment of the Compliance Committee and the approval of the new Regulatory Compliance System that guides the Group in the transition towards an integrated model. Similarly, a regulatory compliance section has been provided on the corporate website that centralises information, including the Code of Conduct and the complaints channel, and an Internal Information System (IIS) has been

implemented in accordance with legal standards, which allows for:

- Centralised management of complaints.
- Full digitisation with traceability.
- Guaranteeing confidentiality and anonymity.
- Outsourcing management with oversight by the Committee.

In addition, with the aim of continuing to improve in this regard, **Haizea Wind Group** has prepared an Action Plan for the coming year, which includes:

- Training in Regulatory Compliance and the use of the IIS.
- Updating of Risk Matrices and Reports.

- Preparation of specific matrices for Haizea Investments and evaluation of other companies.
- Integration of Haizea Breizh.
- Review of Corporate Policies and associated documentation.

In addition, Haizea Wind Group joined the UN Global Compact, a leading global initiative for the promotion of the Sustainable Development Goals at the business level. We have undertaken to comply with its ten basic principles for ethical management, which stem from international declarations on human rights, labour, the environment and the fight against corruption. As part of this commitment, a list of specific objectives has been drawn up for HWG and, for each of them, an action and a specific sustainable development indicator has been established. The following objectives are noteworthy:

- To improve the production and efficient consumption of resources and uncouple economic growth from environmental degradation.
- To protect labour rights and promote safe and hazard-free workplaces.
- To improve and promote the social, economic and political inclusion of all people.
- To significantly reduce waste generation through prevention, reduction, recycling and reuse.

Lastly, with the aim of accelerating progress towards meeting the 2030 Agenda, HWG has committed to the *Forward Faster* initiative and is working on:

- Gender equality.
- Climate action.
- Sustainable finance and investment.

In conclusion, despite the achievements in 2024, commitment to a culture of compliance, sustainability and social responsibility will remain our priority. At Haizea Wind Group we will continue to work on improving our processes and implementing new policies that strengthen our contribution to sustainable development.





# 5. Information on environmental matters

## 5. 1. Group Policies

At HWG we believe in sustainability as a way of doing things, aligning the Group's strategic development with the concerns and needs of our stakeholders and combining the achievement of profits with a commitment to society and respect for the environment.

As a result of our commitment to respecting the environment, we have incorporated a series of internal policies and procedures into our operations:

Integrated Group Policy encompassing general management and action principles for Human Rights, Occupational Hazard Prevention, Environmental, Energy and Quality Management, which was approved by the CEO and communicated to employees over the Intranet. A commitment to environmental excellence is one of the starting points of this policy, which is deployed in a series of principles for action on Environmental Management, especially the following:

- Continuously improving and preventing pollution, minimising and preventing, as far as possible, the environmental impacts of our activity.
- Involving, training and holding accountable the people who make up the organisation so that they respect, share and apply the Environmental Management System, whether they are employees, suppliers or subcontractors.

All people in the organisation must therefore know and accept this policy and strive to minimise the environmental impact resulting from their activities and the use of the work equipment, installations and resources made available to them.

Likewise, in FY 2022, Haizea Tecnoaranda approved a new environmental policy updating the responsibilities and competencies in this area and strengthening its environmental commitment, which has been in force all of 2024. In addition, in 2023 this company implemented a new energy review procedure that describes the methodology for conducting the energy review, with the following objectives:

- · Identify the current types of energy.
- Evaluate past and current energy use and consumption.
- · Identify significant uses of energy.
- Determine and prioritise opportunities for improvement.
- Estimate future uses and consumption.

The Group's <u>General Code of Ethics and Conduct</u>, which states that the Group will promote the protection of and respect for the environment, will integrate this objective into its activities and promote the implementation of good environmental practices, making efforts to consume resources responsibly and manage waste properly by minimising its generation.

In this sense, with the aim of extending the General Code of Ethics and Conduct not only to the people who make up the Group but also to the suppliers with whom we have signed contractual relationships, we have a <a href="Code of Conduct for Suppliers">Code of Conduct for Suppliers</a>, which is included in the General Terms and Conditions for Purchasing signed by suppliers and contractors.



Instruction on good environmental practices and awareness guidelines, which seeks to raise awareness among all personnel about the problem of waste to encourage the reduction, reuse and recycling of waste and packaging and to take action to reduce energy consumption. Good practices have been established for the management of the following items: water, paper, batteries and ink cartridges, atmospheric emissions, energy consumption, hazardous materials, purchases, inert waste, computer equipment, transport and metal work.

Procedure for identifying and assessing environmental aspects which applies to all Group plants but has special importance for Haizea Grupo WEC's casting activity, the Group company with the greatest potential environmental impact associated with its business (casting).

#### **Certifications**

HWG has continued to implement the Environmental Management System in accordance with the standards and certificates most recognised internationally and the highest compliance standards.

All our plants (Haizea Bilbao, Haizea Tecnoaranda, Haizea Grupo WEC and Haizea Breizh) have ISO 14001 certification, which is the most important and commonly used technical standard to implement and assess environmental management systems. This certificate specifies the requirements for an environmental management system so that organisations control their environmental aspects and impacts and thereby improve their performance and results in that area. By obtaining this certificate, which is completely voluntary, the Group has demonstrated its proactivity in exceeding legal requirements and achieving excellence in environmental matters.

In recent years we have been working on obtaining certification in energy management systems, according to ISO 50001. This certificate helps organisations to implement an energy policy and properly manage the energy-related aspects

of their business, ensuring improvements in consumption and energy efficiency. The Haizea Grupo WEC foundry unit obtained this certificate in 2022 and Haizea Tecnoaranda did so in 2023. In addition, at Haizea Grupo WEC, an energy efficiency course was taught to support its implementation. Haizea Bilbao worked on this certificate throughout 2024 and expects to obtain it in 2025.

Additionally, in 2024 Haizea Tecnoaranda received the gold medal from EcoVadis, the sustainability rating analyst, while Haizea Grupo WEC and Haizea Bilbao received silver medals.

For the first time, in 2024 Haizea Bilbao submitted its assessment through CDP, a global standard for environmental disclosure. In this way, we reported our environmental performance and the environmental impact attributable to our organisation can be evaluated.

# Resources dedicated to environmental risk prevention

In relation to the resources dedicated to the environment, each plant has at least one environmental manager in charge of supervising and carrying out the improvement actions needed to reduce our environmental impact. In the Group there are five people dedicated full time to environmental risk prevention, of whom two are at Haizea Bilbao, one is at WEC and two at Tecnoaranda.

Since 2022, the ongoing improvement area at Haizea Grupo WEC has been working to standardise more streamlined, flexible processes to reduce lead time and eliminate non-value-add processes, which also means environmental impact is reduced through greater efficiency.

The expenses borne by the Group to reduce environmental impact and protect and improve the environment are mainly associated with the management and removal of waste and with certain investments. In 2024, several environment-related investments were made, totalling 592,000 euros. Some examples of such investments are



the construction of a waste facility away from the plant where production takes place, in accordance with current legislation. The Group also expanded its proposal for free sustainable transport to shift workers at the factory, adding a third line, thereby encouraging the use of sustainable collective transport.

In 2024, HWG formed a multidisciplinary team to conduct a new Sustainable Mobility Diagnosis, from which a Mobility Plan will emerge with objectives and actions that will improve our employees' access to their workplace, while minimising negative environmental impact by reducing

greenhouse gases emissions and associated particulate pollution.

These studies are being conducted with the assistance of an expert company, which will include cutting-edge solutions in collective transport for shift workers.

In the last financial year, the sustainable mobility service for employees expanded its frequency and provided transport to an average of more than 200 daily users, with a resulting reduction in emissions from employees using fuel. In addition, the Carshare project is being worked on using a carpooling platform.



## 5. 2. Key risks identified

As a Group we are committed to the environment and awareness in this area has led us to develop policies and implement measures that minimise the environmental impact and risk that we may have from our activities. We have reflected on the potential impacts on the environment related to our business and identified the following key risks:

- · Legislative changes.
- Waste generation.
- Possible environmental damage to the surroundings(emissions, discharges, soils).
- Negative impact on biodiversity.

To mitigate the risks identified, KPIs have been defined and are subject to constant monitoring by the Group's Management.

As of 31 December 2024, there is no provision for risks and expenses arising from environmental actions nor is there any ongoing litigation, compensations or contingencies related to the protection and improvement of the environment. In addition, the Directors of the Parent Company do not expect that significant liabilities of this nature will arise in the event of an inspection.

Lastly, it should be noted that every Group company has liability insurance to cover damage and Haizea Bilbao has Contractors' All Risks insurance (CAR).



## 5. 3. Environmental management and performance

## 5.3.1 Climate change and other types of pollution

Haizea Wind Group has a sustainability and decarbonisation strategy, known as Haizea ZERO, as part of its commitment to becoming carbon neutral by 2040. This strategy establishes the following action lines:

#### 2024:

- 100% electricity from renewable energy
- Calculation of carbon footprint including ranges 1+2+3 in accordance with the GHG protocol.
- Developing a Decarbonisation Plan
- 2025-2027: 2% annual reduction in energy consumed per tonne/billed (base year 2024)
- 2027-2030: 95% of energy consumed must be from renewable sources.
- **2030:** 50% reduction in total emissions
- 2040: Being Carbon Neutral
- 2050: Achieving Net Zero as per SBTi

To meet these objectives, the project is divided into four stages:

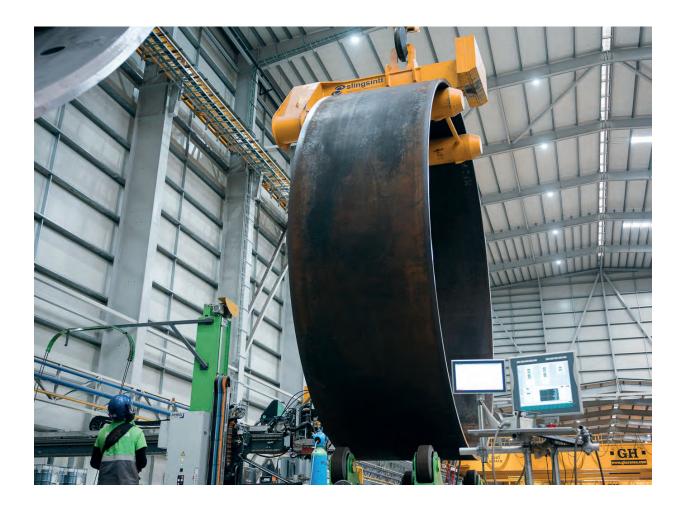
- 1. Carbon Footprint Measurement: we ask all our suppliers to provide us as soon as possible with data on their greenhouse gas (GHG) emissions and greater accuracy in the means of transport used in each category (in accordance with GHG conversion factors - United Kingdom) to ship their products to Haizea. This data must include the direct and indirect emissions (Scope 1, 2 and 3) from producing the materials and services that they supply to Haizea Wind Group companies. In addition, all our suppliers must calculate their footprint under an international standard - ISO 14064 or the GHG Protocol Corporate Accounting and Reporting Standard - in a way that guarantees the consistency and comparability of the information shared.
- Analysis of possible applicable scientific methodologies and definition of emissions reduction targets. Once the data have been

- collected and the most appropriate scientific methodologies selected, a roadmap will be devised for achieving the emission reduction targets so we can minimise the carbon footprint generated by our supply chain. These targets will be based on an analysis of the data collected and industry best practices.
- 3. Support and Collaboration: when necessary, Haizea Wind Group will provide our suppliers with information and technical assistance to help them identify opportunities for emissions reduction and to implement more sustainable practices in their operations. As a first step, we require our suppliers to complete a questionnaire that allows us to group them by stage of development. In addition, we will encourage suppliers to work together to share best practices and lessons learned, creating a support network that drives innovation and continuing improvement along the supply chain.
- 4. Monitoring and Reporting: Haizea will continuously monitor progress in achieving the emissions reduction targets set. With all the information collected, we will publish regular sustainability reports detailing the progress made in reducing the carbon footprint of our supply chain, fostering transparency and accountability.

At HWG, actions were defined after calculating carbon footprint associated with:

- Reducing gas consumption by means of new pipes that prevent leaks and the use of induction for heating.
- Exterior lighting project, minimising the use of generators.
- New facility for solvent recovery.
- Environmental management in the supply chain.
- Reduction of the ratio of waste going to landfill.





In line with our strategy and objective of fighting climate change, and as a necessary step towards reducing CO2 emissions, we are making calculations of and monitoring GHG (greenhouse gas) emissions which quantify, for the time being, emissions in companies whose business has a significant impact. This helps us to be able to set specific targets and promote the economy's decarbonisation.

In addition, the Group has worked to quantify Scope 3 emissions. This calculation began at Haizea Bilbao in 2022 and at Haizea Tecnoaranda it was carried out in 2023. However, in 2023 at Haizea Grupo WEC a project was launched to calculate the organisation's carbon footprint in all its business units for scopes 1, 2 and 3. The aim of this project, promoted by the Association of Foundries of the Basque Country and Navarre, is the coordinated application of the methodology for calculating the European Environmental Footprint

for Basque SMEs in the foundry sector, using a tool specifically developed for this purpose. It is expected to start measuring those of the machining and surface treatment units in the first quarter of 2025. Scopes 1, 2 and 3 were measured at the corporate level in 2024.

To measure the progress of our actions to fight climate change and reduce GHG emissions, we have set a series of objectives at the corporate level, applicable therefore to all our workplaces. They consist of the gradual reduction of:

- Waste generation per tonne of finished product.
- Energy consumption per tonne of finished product.
- CO2 equivalent emissions per tonne of finished product.

All this is being done to reach the group's goal of being carbon neutral by 2040.

The historical series of emissions data from calculating the organisational carbon footprint is as follows:

Haizea Wind Group	Scope 1	Scope 2	НСО
HBIO – 2023	1,140	-	1,140
HBIO – 2024	1,595	-	1,595
H WEC - 2023	557	-	557
H WEC - 2024	607	-	607
H Tecnoaranda – 2023	489	-	489
H Tecnoaranda – 2024	567	-	567

Below, we list emissions relative to production variables. In 2024, we reduced the number of tonnes cast (Haizea WEC Group) and sections manufactured (Haizea Tecnoaranda) but we increased the number of tonnes produced (Haizea Bilbao).

#### Haizea Tecnoaranda

Indicator:	2021	2022	2023	2024
Emission tn carbon (scope 1 and 2) / section	0.53	0.36	0.51	0.69

The variation in emissions in absolute values increased due to the increase in the number of manufactured sections, which entails fixed expenses such as lighting and heating, etc., that do not directly depend on production.

2024 was the fourth consecutive year in which 100% of electricity consumed came from renewable sources.

It should be noted that the company has been registered since 2022 in Miteco, a register that includes the efforts by Spanish companies, government departments and other organisations to calculate, reduce and offset greenhouse gas emissions generated by their activities, specifically scope 1 and 2 emissions. In 2023, the process for measuring Scope 3 emissions began, including emissions generated by waste management, water consumption and the majority of the workforce's travel.





#### Haizea Bilbao

At Haizea Bilbao, to achieve the objectives set, a PPA (power purchase agreement) was signed with Acciona to supply 100% renewable energy starting in 2022. In 2024, emissions were 0.026 tn CO2 eq / tn finished product (0.021 in 2023), all associated with scope 1.

It should be noted that, despite the fact that emissions have increased in absolute values due to the increase in production, we are continuing to focus on the decarbonisation actions carried out in 2024 and previous years.

#### **Haizea Grupo WEC**

At Haizea Grupo WEC, 100% of the electricity used by all the production processes comes from 100% renewable sources. In 2024, the ratio of tonnes of CO2 equivalent per tonne cast was 0.044 (0.022 in 2023), all associated with scope 1.

The Group is not subject to or affected by the emissions allowance rules issued by the European directive and contemplated in the national emissions plan, which is why it is not in a position to provide information on greenhouse gas emissions allowances.

### 5.3.2 Circular economy and waste prevention and management

At HWG we are firmly committed to the implementation of an environmental strategy based on the circular economy, with the aim of minimising the possible negative impacts resulting from our business and with the firm aim of effectively managing the waste generated. Aware of this, in FY 2024 the Group has continued to improve the different recycling and reuse processes that aim to eliminate and reduce waste, highlighting the following initiatives:

- Signage has continued at the plants, improving identification and zoning of waste containers.
- Reduction of the carbon footprint due to plastic compacting and with it a reduction in transport.

Below is a list of the most important circular economy and waste management initiatives implemented at each plant:



#### Haizea Tecnoaranda

- Work is continuing on waste circularity, increasing efforts to reuse pallets, plywood, scrap metal, cardboard and plastics in good condition, zinc dust, etc.
- Improvement of waste management through recycling PPEs, through the supplier collecting used boots for conversion into secondary materials that are reintroduced into the production chain.
- e Efforts to reduce the carbon footprint of waste collection, thanks to compactors for waste similar to those used for urban waste, paper and cardboard and plastics, resulting in 72% fewer trips for collection than in 2023.



#### **Haizea Grupo WEC**

- At Haizea Grupo WEC, twiceyearly meetings are held to monitor environmental aspects, which we call the "MA Forum". These meetings deal with the following main aspects:
  - Monitoring of environmental KPIs.
  - Incidents detected.
  - · Actions taken and planned.
- Waste management continues to improve because of the separation of pallets and reusing or recovering pallets that are in good condition, with very positive results in 2024, when 27.82 tonnes of wood were reused.
- At the foundry, the main waste generator, actions are being carried out to improve the ratio of 'Sand waste managed/Tonnes produced', including the following:
  - Separation of the metal portion from the sand waste.
  - · Recovery of ceramic waste.
  - Development of the project to install a mini screening plant, which was commissioned in the first quarter of 2024. With this installation, sand waste was pretreated internally to obtain differentiated fractions from the waste through sieving and processing. Differentiated fractions are then obtained, some going to landfill and others being reused in the sand circuit.
- At the end of 2022, three cardboard, plastic and big box container waste compactors were commissioned at the foundry, which transform the waste into bales of cardboard and plastic. This initiative has resulted in a reduction in CO2 emissions as it considerably decreases the number of trips associated



- with waste management, with 77 in 2023 and 21 in 2024.
- Similarly, another compactor was installed in the surface treatment unit, which has reduced the number of trips in the last two years.
- In 2024, a project to recover fine smelting waste was launched. This waste, classified as hazardous, which until then had been destined for landfill, will go to a company that will use it as raw material in its production process.

#### Haizea Bilbao

- Best environmental practice in the use
   of aggregates: the Logistics department
   has developed a working framework for
   the materials used for storing monopiles.
   Material from nearby quarries (Mañaria)
   and from our own earth moving due to
   our expansion are used. In addition, the
   reuse and processing guidelines has
   been defined and refined over the years,
   including it as a plant storage CAPEX.
- Improvements in identifying, segregating and managing waste: the ID labels for all waste (hazardous and non-hazardous) have been overhauled; intermediate collection points created in workshop areas; and removal flows optimised. Training in waste management for managers has started. An improvement is expected to be confirmed by reducing the hazardous waste "contaminated material".



It should also be noted that for waste management, the Group companies have contracts with management companies specialising in waste transport and handling. The entire process, from collection to handling and, in some cases, return for

reuse, as well as the liabilities of the two parties, is included in the contracts.

The Group's waste generation for 2022, 2023 and 2024 is listed below, both by type of waste and destination:

Type of Waste (in tonnes)	2022	2023	2024
Hazardous waste	679	688	1,137
Non-hazardous waste	14,914	14.168	14.519
Type of Waste (tonnes)	2022	2023	2024
Hazardous waste	679	688	1.137
Recovery destination	102	160	208
Disposal destination	348	333	691
Valorization destination	228	195	238
Non-hazardous waste*	lous waste* 14,914 14,168 14		14,519
Recovery destination	394	699	6,457
Disposal destination	3,838	3,613	3,188
Valorization destination	10,681	9,856	4,874

<sup>\*</sup> In 2023, an in-depth analysis of the waste considered non-hazardous began at Haizea Bilbao, resulting in the monitoring of waste that can be reclaimed and is recoverable, such as scrap metal, shavings, frames/ferrules and slag.

Hazardous waste is considered to be waste with intrinsic properties that present risks to health or the environment, such as smelting residue, absorbents, paint, sludge, etc. After a detailed laboratory analysis, the waste called flux also was considered hazardous waste in 2024.

The non-hazardous waste generated in 2024 included the following main materials: shot dust, scrap metal, slag, shavings, zinc dust, paper and cardboard, plastics and wood.

The Group has KPIs for monitoring waste generation that help to set specific actions and specific objectives, as well as to monitor whether the measures implemented are having an effect. These KPIs are listed below for each of the Group companies:





#### **KPIs**

#### Haizea Bilbao

Indicator	2022	2023	2024
Kilograms of hazardous waste per ton produced	4.65	4.81	6.50
Kilograms of non-hazardous waste per ton produced	111.73	109.75	65.89

In 2024, the kilograms of non-hazardous waste per ton produced decreased significantly compared to the previous year.

#### Haizea Tecnoaranda

Indicator	2023	2024
Hazardous waste per kg section	205	202
Non-hazardous waste per kg section	159	58
Urban waste per employee kg/person	80	5
Ratio: Waste recycled/waste generated	68%	81%

#### **Haizea Grupo WEC**

Indicator	2021	2022	2023	2024
Waste sand/tonnes cast	5.32%	3.90%	5.59%	2.43%

As mentioned in the actions carried out, one of the Groups' major circular economy projects at the Haizea Grupo WEC foundry is the improvement of waste management. The improvement has been demonstrated directly by monitoring and tracking the sand per tonne cast waste indicator. The lower percentage is due to installing the sand screen, which was done the previous year. During the calibration process, which lasted until June 2024, there were constant improvements made. As of that month, the screen began to operate at 100%, and the positive results were immediate.



#### 5.3.3 Sustainable use of resources

We are working to optimise the use of material resources at all stages of our business. The Group is therefore continuing to promote efficient resource use, focusing on the consumption of raw materials and energy. Using the environmental and energy management systems implemented in the Group, it is possible to measure, assess and act to continue implementing measures that allow us to increase energy efficiency and optimise resource consumption in our operational processes.

The following key measures that were linked to the sustainable use of resources were implemented in 2024:

- A clear commitment to the consumption of renewable energy guides the Group's strategy in this area. Therefore, in 2023, a renewable power purchase agreement (PPA) was signed, which is valid until 2031. This agreement was supplemented by another, valid for five years, which came into effect in January 2024. It will allow the power consumed by the new Bilbao monopile plant to be 100% renewable and consumption to be allocated to other Group plants.
- Installation of solar panels for self-consumption of power at Haizea Tecnoaranda, completed in November 2023, which reduced CO2 emissions by more than 1,310,820 kg, compared to emissions in 2022.
- At Haizea Tecnoaranda the following initiatives were implemented to reduce our carbon footprint:
  - Incorporation of LED lights as part of the renovation of the car park lighting.
  - Incorporation of a refrigeration plant to take advantage of the surplus power from the photovoltaic system, increasing the temperature of the stored water from 75°C to 90°C, which means better performance by the paint booth heating system, in addition to using the cold for the office and changing room air conditioning.
  - Installation of a SCADA system (industrial automation software) to monitor

- compressors, the photovoltaic plant and other energy consumption meters.
- Installation of a 250kw variable air compressor with an ultra-efficient IE5 motor, which replaces the previous compressor.

### **Lean Manufacturing at 100% of Haizea Wind Group plants**

All Group plants operate under the 'lean manufacturing' methodology to make the processes more efficient and improve product quality by incorporating operational improvements such as:

- Daily shop floor meetings.
   Creation of working groups to track continuing improvement initiatives:
  - Maintenance requests.
  - Safety training Minor improvements in the logistics and production process.
  - · Visual, efficient plant management.
  - Introduction of new roles within the teams that focus on safety, quality and delivery.
- · Monthly Management plant visits.

In 2024, the lean manufacturing team at Haizea Bilbao distinguished itself by doing the following:

- 1. Implementing the 5S method in some areas, reducing the duplication of tools and pieces, more open spaces.
- **2.** Analysing process improvement points and tracking productivity and safety improvement actions in weekly meetings.
- Standardising processes, defining tasks by position and creating detailed operations standards that include best practices for safety, quality and productivity.
- **4.** Developing a monitoring system for training needs per person/job.

### **Circularisation of materials after project closure**

At Haizea Bilbao we have a process for collecting, classifying and inventorying surplus materials and tools after project completion. Mainly screws,



bolts, nuts, washers and clamps are collected. All these items are available to Project Managers in the warehouse. Since 2023, ferrules and rings have also been collected and sold as scrap.

responsible use, we have vending machines to issue tools as well as an ID system using employee cards to improve tracking. The project has led to a significant reduction in disc consumption over the years.

#### **Control of welding tools**

To reduce consumption of abrasive discs at the Haizea Bilbao plant and educate the team on



#### 5.3.3.1 Raw materials

The consumption of the main raw materials used by the Group in 2023 and 2024 is shown below. The reason for the evolution in absolute terms lies in the increase in sales volume and its associated orders:

#### **Consumption of raw materials**

Consumption of raw materials	Units	2023	2024
Paint	Litres	785,159	938,536
Flux	Tons	924	913
Sheet	Tons	101,371	48,279
Ingot	Tons	13,441	15,318
Scrap	Tons	6,653	7,563
Sand	Tons	1,372	1,793
Resin	Tons	975	834
Catalyst	Tons	405	247

The consumption of sheet metal raw materials was higher in 2023 mainly because sheet metal was stockpiled to meet Haizea Bilbao's production forecasts, so its purchase fell in 2024.

All other consumption of raw materials increased across the board and is associated with the increase in tonnes cast at Haizea Group WEC and production at Haizea Tecnoaranda.

#### 5.3.3.2. Energy and water

#### **Energy consumption**

Energy consumption (kWh)	2024	2023
Electricity (kWh)	50,532,217	41,690,706
Natural Gas (kWh)	8,264,187	8,045,085
Diesel (litres)	173,351	148,914

The focus of the Haizea Grupo WEC foundry unit in 2024 has been on improving energy management and use through more exhaustive monitoring of the use of the furnaces to minimise downtimes and heating times that are not taken advantage of. This has led to more efficient energy consumption. It should also be noted that, as established by

regulations, all our plants undergo energy efficiency audits every four years. Because of these audits, certain improvement actions have been identified that we are gradually implementing. They also help us to make sustainable use of resources. All electricity consumption, it should be noted, comes from 100% renewable energy.



Haizea Bilbao has increased its electricity consumption in absolute values due to the expansion of the monopile business. There has been a remarkable improvement in energy efficiency due to electricity consumption, the indicator comparing consumption with the tonnes produced:

management system that helps us to monitor consumption in real time and can generate alerts to avoid inefficiencies. In 2024, the network of data capture analysers was expanded, a project that will continue in 2025 to cover 100% of energy consumption.

#### kWh electricity/Tn produced

2022	240
2023	188
2024	129

The Haizea Group, as a group considered a Major Energy Consumer according to the Energy Sustainability Act (Law 4/2019), has an energy



#### **Tons of Oil Equivalent at HWB**

	2023	2024
Electricity	863.94	1.090.11
Natural gas	310.26	291.5
Petrol	0.33	0.06
Diesel A and B	78.55	103.4
	1.253.08	1.485.08

#### Water consumption

Below is the historical water consumption information:

Water Consumption (m³)	2022	2023	2024
Foundry (WEC Group)	14,065	12,890	7,436
Tecnoaranda	697	464	468
Haizea Bilbao	3,600	7,135	4,682

At Haizea Bilbao, water consumption in 2023 and 2024 was affected by the execution of expansion works. In 2025 we will be able to verify real consumption due to the production process.

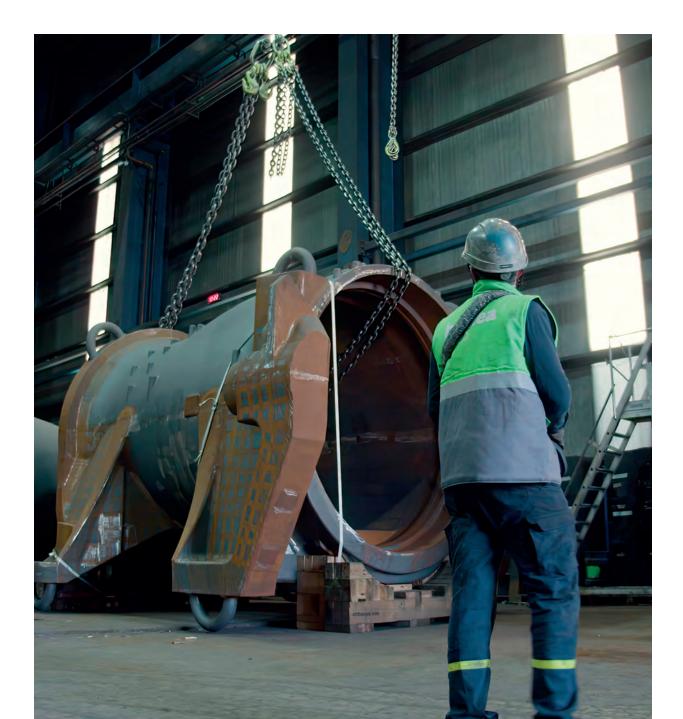
#### 5.3.4 Protection of biodiversity

Most activities and operations of the production plants do not have a direct influence on biodiversity and protected areas since the plant facilities are located on duly authorised industrial estates and as such do not form part of areas considered to be protected. We also comply with all required environmental regulations.

Our goal is to manufacture our product based on the customer's specifications and design. Our customer undertakes to adopt a leadership position in biodiversity conservation and protection and promises to raise the awareness of all stakeholders regarding the magnitude of this challenge and the benefits associated with addressing its solution.

Haizea Bilbao has two wastewater treatment plants to limit discharges into the sea to under the legally permitted parameters.

In 2025, the analysis and assessment of environmental risks is planned to be outsourced in accordance with the Environmental Responsibility Act.





# 6. Social and employee-related matters

#### 6. 1. Group policies

At Haizea we want to improve in all areas of Group management, including its governance, and, more specifically, to avail ourselves of Corporate Policies and Directives that allow us to organise and standardise the way in which Group companies are managed.

Although Haizea already had a number of Corporate Policies and Procedures, we decided in 2024 to launch (and complete in 2025) a process to collect, harmonise, standardise and amend the Corporate Policies and Directives to fit the Group's current situation.

We have focused on the following Policies (in order of priority):

#### Group 1:

- · Safety Policy.
- Legal Compliance and Information Security Policy.
- Corporate Governance and Communication Policy.
- · People Policy.

#### Group 2:

- Quality Policy.
- Risk Policy.
- · Purchasing Policy.
- Social Responsibility, Ethics and Conduct Policy.

#### **Group 3:**

- Environmental and Sustainability Policy.
- Innovation and Development Policy.

**Safety Policy:** The safety of our contributors (employees, customers, suppliers and subcontractors) is absolutely paramount. We implement rigorous safety measures and continuous training, which enable us to prevent accidents and aim for a safe working environment for all.

#### **Legal Compliance and Information Security**

**Policy:** We comply with all applicable laws and regulations, operating with integrity and transparency. Security when processing information (on the business, our customers, our employees and, in general, all stakeholders) is critical and we are committed to managing it properly.

#### **Corporate Governance and Corporate**

**Communication Policy:** We maintain clear and effective communication, both inside and outside the organisation. We are a group with several production centres, and we want to be part of the local universe, taking part in cultural, sports and social action activities in our areas of influence. The policy includes the protection of competition.

**Human Resources Policy:** We will go as far as our people take us. We value our staff and seek their development and well-being, both professional and personal. Our policy focuses on attracting, retaining and developing talent and ensuring diversity and equal opportunities.



**Quality Policy:** Our commitment to quality is clear. Each component that we manufacture must meet the highest market standards, thereby ensuring the trust and return of our customers, which allow us to be a group that is appreciated by its customers and whose business is sustainable.

**Risk Management and Internal Control Policy:** We proactively identify and manage risks to protect our business and ensure its continuity.

**Purchasing Policy:** Our purchasing processes are rigorous. They are aimed at supporting our contractual commitments, the search for corporate synergies and the profitability of our company.

Corporate Social Responsibility, Ethics and Conduct Policy: Our code of conduct guides our

actions, ensuring that we operate ethically and responsibly, both on and off our premises.

**Environmental and Sustainability Policy:** We are a decisive link in the energy transition, but as a manufacturer of capital goods, we are also aware of our impact on the environment and we strive to operate sustainably, minimising our environmental footprint and promoting green practices.

**Innovation and Development Policy:** Innovation must drive our growth. We are a leading company in the manufacture of innovative products, especially in the offshore market, in a demanding market, and our leadership must go hand in hand with the optimisation of our processes and products.



#### 6.2. Key risks identified

The people who make up **Haizea Wind Group** are key to ensuring the success and quality standards that characterise the Group: **we will go as far as our people go**. Therefore, Management has identified the main risks related to personnel:

- Not being able to attract talent and/or retain it.
- Weaknesses in the area of occupational hazards and safety.
- Insufficient measures to enable a satisfactory work-life balance.

The consequences associated with the materialisation of these risks could be a drop in employee productivity and less motivation.

To mitigate the risks detected, KPIs have been defined and are subject to constant monitoring by the Group's Management.

#### 6.3. Management and social performance

#### 6.3.1. Employment

In order to have enough talent to confidently address the challenges faced by the Group, we have worked mainly on two areas: attracting talent and managing talent.

As a result of our commitment to people, 242 people joined the Group in 2024 (266 people in 2023).





#### Workforce at year-end

In 2024 Haizea Bilbao was immersed in a talent recruitment process for the new production plant, with a 550 new hire target. At the end of 2024, approximately 240 people had joined the workforce. Haizea Bilbao adopted a new process called the *Welcome Package*, to streamline new employee onboarding.

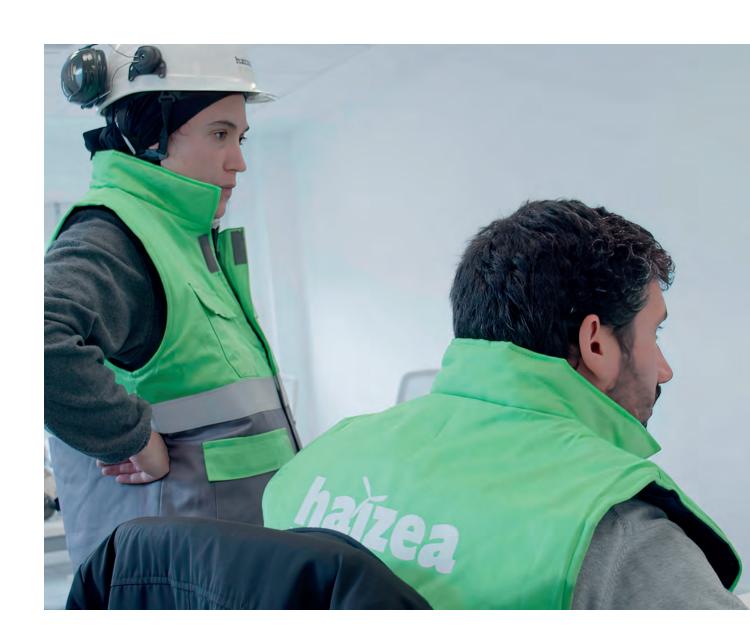
The breakdown of the number of **Haizea Wind Group** employees at the end of 2024 by gender, age, professional category, type of contract and type of working day is as follows:

Total number of employees by gender	31/12/2023	31/12/2024
Men	1,076	1,300
Women	96	114
Total	1,172	1,414
Total number of employees by age	31/12/2023	31/12/2024
Under 30	179	245
Between 30 and 50	801	898
Over 50	192	271
Total	1,172	1,414
Total number of employees by professional category	31/12/2023	31/12/2024
Managers	30	34
Technical staff and middle management	160	231
Administrative staff	19	19
Workers	963	1,130
Total	1,172	1,414
Total number of employees by contract type	31/12/2023	31/12/2024
Permanent	1,031	1,031
Temporary	141	141
Total	1,172	1,414
Total number of employees by type of workday	31/12/2023	31/12/2024
Full time	1,169	1,169
Part time	3	3
Total	1,172	1,414

At **Haizea Wind Group** we are committed to permanent hiring to provide greater stability to the human team that works with us and to retain our talent. However, at year-end 2024, 46% of our employees had permanent contracts (88% in 2023). The decrease in the percentage comes from the number of employees who joined in 2024 with a temporary contract, at Haizea Bilbao in particular. In addition, the work-life balance and flexibility measures we have in place allow employees to make their work and personal lives compatible without having to work part-time. The proof of this is that 99% of our human team consists of full-time contracts (99% in 2023).

Our business is mainly done in production plants, where traditionally there were fewer women. 92% of our employees are therefore men (92% in 2023). However, we are working on attracting and hiring more women in our business.

In response to the objective of increasing the number of women in leadership positions, in 2024 we reached a proportion of 19% women in the total composition of the Management Committees at each of our plants.





#### **Annual average contracts**

The experience and knowledge of the people who are part of the **Haizea Wind Group** are one of the pivot points that have made our competitive position possible. This approach is consistent with the type of contract that we most sign with our workforce, as can be seen from the following breakdowns of the annual averages for permanent and temporary contracts.

		2023		2024
Average no. of employees by gender	Permanent	Temporary	Permanent	Temporary
Men	968	44	1,136	80
Women	77	4	102	10
Total	1,045	49	1,238	90
		2023		2024
Average no. of employees by age	Permanent	Temporary	Permanent	Temporary
Under 30	147	16	194	27
Between 30 and 50	718	27	796	52
Over 50	180	6	248	11
Total	1,045	49	1,238	90
		2023		2024
Average number of employees by professional category	Permanent	Temporary	Permanent	Temporary
Managers	29	-	34	-
Technical staff and middle management	151	1	209	9
Administrative staff	17	2	19	-
Workers	848	46	976	81
Total	1,045	49	1,238	90
Average number of employees by type of working day	2023	2024		
Full time	830	1,233		
Part time	264	5		
Total	1,094	1,238		

#### **Employees with disabilities**

At **Haizea Wind Group** we are strongly committed to non-discrimination, the inclusion of people with disabilities and universal accessibility, and promote the direct hiring of employees with certified disabilities. At the end of 2024, there were 18 people with disabilities on the Group's workforce (14 people in 2023).

At **Haizea Wind Group** we ensure that our recruitment processes do not exclude anyone when the requirements of that specific position permit it. Haizea Tecnoaranda meets the requirement of 2% of employees with disabilities required by the General Disability Act for companies with 50 or more employees. Although the foundry units of Haizea Grupo WEC and Haizea Bilbao have a certificate of exceptionality issued by the local authority, the aim is to contract more services and

products from companies that employ people with disabilities. In 2024, we collaborated with special disability job centres with 1,067,000 euros to help people with disabilities enter the job market.

#### **Average salaries**

The Group's compensation system is assigned based on a collective bargaining agreement. Additionally, there is a system through which we intend to establish a professional classification, compensation and career similar to labour market criteria.

Below is the breakdown of the average fixed annual compensation (not including variable compensation) for FY 2024 of **Haizea Wind Group** by gender, age and professional category:

Average remuneration by gender (€)	2023	2024
Men	28,818	31,462
Women	34,340	35,022
Total average	29,207	31,765
Average remuneration by age (€)	2023	2024
Under 30	24,847	26,322
Between 30 and 50	29,299	27,528
Over 50	33,898	35,196
Total average	29,207	31,765
Average remuneration by professional category (€)	2023	2024
Managers	84,359	97,741
Technical staff and middle management	39,062	40,808
Administrative staff	29,218	30,182
Workers	25,307	27,836
Total average	29,207	31,765





In regard to the category "Managers", the average compensation for men is 110,000 euros (117,000 euros in 2023) and the average compensation for women is 72,000 euros (54,000 euros in 2023).

Despite the increase in material and transport costs in 2024, average salaries have remained stable.

#### Wage gap

The applicable collective bargaining agreements regulate the average pay for employees throughout the Group, establishing criteria of equality for similar jobs regardless of gender. Both the pay of personnel subject to an agreement and that of personnel not under it are established equitably to prevent gender discrimination.

The mathematical calculation of the pay gap, understood as the difference between the average

fixed compensation for men and the average fixed compensation for women over the average fixed compensation for men, stands at -11.3% (-11.4% in 2023), according to which a percentage of less than zero represents the percentage that women earn more than men.

This overall figure, which represents a negative pay gap, is explained by the different distribution of job categories between men and women, with a proportionally higher number of women in technical and administrative positions and a higher proportion of men in worker positions, where the average compensation is lower. If we analyse the pay gap by professional category and hourly rate, the differences found are associated with seniority and the responsibilities of that position. The following are the pay gaps by professional category based on the fixed hourly wage:

Wage gap by professional category	2023	2024
Directors	35%	15%
Technical staff and middle managers	13%	3%
Administrative staff	-20%	-6%
Workers	-1%	3%

In 2024, with the signing of the new Haizea Bilbao agreement, work has been done on including measures that work together to reduce the pay gap and support equal opportunities.

### Remuneration for equal or similar jobs in the company

The **Haizea Wind Group** has compensation policies that aim to offer our employees competitive, homogeneous and fair compensation, so performance can be in line with the duties and responsibilities assigned. Each job has salary ranges established based on objective aspects, independent of gender, such as education, years of professional experience or the responsibilities assigned to that position, thereby guaranteeing equality regardless of who is assigned the position.

In cases in which a collective bargaining agreement applies, the average pay is, at least, as established in that agreement, and there are in some cases company-specific agreements that improve on their working conditions.

In the Group, the minimum starting salary in 2024 (lowest position) was 22,000 euros (21,000 euros in 2023), with the ratio over the minimum wage being 1.66 (1.62 in 2023).

#### **Number of layoffs**

The breakdown of layoffs in 2024 at **Haizea Wind Group** by gender, age and professional category is as follows:

Number of layoffs by gender	2023	2024
Men	30	16
Women	3	2
Total	33	18
Number of layoffs by age	2023	2024
Under 30	10	2
Between 30 and 50	18	16
Over 50	4	0
Total	32	18
Number of layoffs by professional category	2023	2024
Managers	2	1
Technical staff and middle management	4	5
Administrative staff	0	0
Workers	26	12
Total	32	18



In 2024, the voluntary turnover rate was 6% (9% in 2023), with 73 voluntary departures caused by voluntary resignations and leaves of absence (167 in 2023).

In addition to layoffs and the previous voluntary departures, there were 66 other departures, mainly associated with retirements and contract terminations (64 in 2023).

In the new agreement signed in 2024 by Haizea Bilbao, new churn management procedures have been included, such as exit interviews for employees who leave the Group (voluntary resignations, unsuccessful trial periods and leaves of absence).

## Implementation of measures of employees' right to digitally disconnect from work

The Group is aware of the importance of streamlining working hours to seek a balance between professional and personal life. The offices have flexible arrival and leaving times to

allow people to satisfactorily deal with their work, personal and family responsibilities. The Haizea Bilbao agreement recognises the right to digital disconnection outside of working hours, respect for rest time, leave time and holidays, as well as personal and family privacy. In addition, as a result of the addition of working from home as a new work-life balance measure, employees have received training in digital disconnection from work.

#### **Social benefits**

At **Haizea Wind Group**, a number of social benefits are offered to employees to promote their well-being and foster a healthy work environment. These measures include lunch vouchers, transport vouchers and nursery school vouchers.

In addition, the company has medical insurance for all Group staff, which is free of charge for directors and managers and their families. Haizea Tecnoaranda has private health insurance which makes different quality-of-life improvement workshops available to employees on a monthly basis.



#### 6.3.2. Work organisation

#### **Organisation of working time**

At **Haizea Wind Group** we respect the breaks and rest periods established by the applicable agreements. Therefore, the organisation of working hours is different for each business, and each has its own work schedule.

At Haizea Bilbao, the indirect workforce has a split shift while the direct workforce is organised into three rotating shifts: morning, afternoon and night. Flexible entry times are available to encourage staff's work-life balance and in 2024 the Workfrom-Home Policy was included, which offers the possibility of working remotely one day a week. Lastly, Haizea Bilbao is also working on a new overtime management procedure that guarantees compliance with the established working day.

At Haizea Tecnoaranda, the work schedule is negotiated based on the guidelines set by the Workers' Statute and the province of Burgos' steel and metallurgical bargaining agreement. This

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schedule was distributed and published and is accessible to all employees. There is also a clock-in/clock-out system for direct personnel.

It should be noted that Haizea Tecnoaranda has a flexibility model aimed at adapting to the needs created by a three-shift model and the excesses posed by a fourth shift. This model was still being developed in 2024. The main benefits of flexible hours are as follows:

- Increased competitiveness so we can adapt to the needs of our customers.
- Increased flexibility for adjusting productive capacity to real needs based on the workload, both to increase and decrease it.
- Improvement in the planning and organisation of shifts.
- It ensures improved and stable employment, since the internal management of the working day avoids the use of external measures.

The Haizea Tecnoaranda Equality Plan includes the following measures, in addition to those established by law, to help with work-life balance:

 Reduced working hours, schedule flexibility, shift changes, working from home, unpaid leave and the possibility of combining reduced working hours to form full days.

In regard to Haizea Grupo WEC, the work schedule is reported to the Works Council. The indirect workforce has a split shift from Monday to Friday, and flexible arrival and leaving times and most of the direct workforce has an 8-hour workday, in three shifts, with a break in the middle of the day. Any employee can request a shift change. There is also a clock-on/clock-off system for direct staff. For indirect staff, there is also a clock-on/clock-off system, using either a terminal or online (phone or PC).





#### **Absenteeism**

At **Haizea Wind Group** we monitor the absenteeism that occurs in the Group, understanding work absenteeism as non-compliance by employees with the workday due to sick leave, work accidents, maternity, union hours, leaves permitted in the collective bargaining agreement, leaves of absence and absences due to unpaid leave, amounting to 217,000 hours in 2024 (143,000 hours in 2023). The total absenteeism rate for FY 2024 was 13.1% (7.7% in 2023).

In order to improve the absenteeism rate, we hold meetings to learn what causes absenteeism and, each week, based on the information gathered, a series of actions aimed at reducing it is implemented. At Haizea Bilbao they plan to compensate three absences when the absenteeism rate is below 6%.

# Measures aimed at facilitating the enjoyment of personal and professional work life balance and promoting a coresponsible exercise of this by both parents

To encourage work-life balance, at **Haizea Wind Group** we have implemented a series of measures that consist of reducing working hours and adapting schedules based on personal situations that go beyond the assumptions set out in the Workers' Statute or the applicable collective bargaining agreements.

We have family balance policies, which aim to encourage all employees to strike an appropriate balance between work and family life.

The Group is continuing to work on promoting the personal and professional work-life balance of its employees, in addition to incorporating new practices that allow them to disconnect from work. Similarly, pregnancy periods, maternity and paternity leave and breastfeeding leave are respected in excess of the applicable legislation, so they can be applied based on the employee's needs.

The data on parental leave is shown below. A return-to-work rate of 100% after leave ends has been observed in the reporting period:

Parental leave	2023	2024
Total number of employees who were entitled to parental leave	59	52
Total number of employees who have taken parental leave	59	52
Total number of employees who returned to work during the reporting period after the end of parental leave	59	52
Return to work rate	100%	100%
Total number of employees who returned to work after the end of parental leave and were still employees 12 months after returning to work	59	31
Retention rates for employees who took parental leave	100%	53%





#### 6.3.3. Health and Safety

It is important to note that in February 2024 there was a change in the occupational hazard prevention service at Haizea Bilbao, from an outside service to an in-house one. This in-house prevention service is **supervised** by Haizea Bilbao HSE Management, and consists of two senior occupational risk prevention technicians, both working exclusively on occupational risk prevention management.

Since the establishment of the in-house prevention service, a specific department has been created dedicated exclusively to environmental issues.

Likewise, in 2024, there was an evaluation of psychological and social factors.

Significant improvements have been implemented in the accident reporting and investigation system. Using a communication form, accidents are reported directly to the HSE director, who

in turn sends them to a common email address for accidents and incidents, which ensures the information is reported to various members of the organisation. This system has been complemented by the modification of the reporting formats. Different methods of analysis have been included and meetings organised with the departments involved to define and agree on the preventive actions needed to prevent similar incidents from happening again.

In the area of prevention, Safety One Point Lessons (SOPL) have been implemented during shift changes. These talks are given by managers and team leaders to remind employees of the safety rules to follow, as well as prohibited behaviours or errors detected.

In addition, the HSE department has contracted new comprehensive occupational hazard prevention management and health monitoring



software, which allows all relevant information to be centralised in a single platform.

In October 2024, a Health and Safety Committee (HSC) meeting agreed to create a working group to define and implement an addiction prevention plan to address potential problems related to those issues in the work environment.

Throughout 2024, various training courses were given on occupational hazard prevention, both in compliance with the bargaining agreement and in work teams, as well as at the basic level of prevention. These training sessions were made possible by the increase in the number of preventive resources, with a total of 13,622 hours of training.

A medical examination programme was also implemented, which allowed 1,059 check-ups to be done during the year.

A system for reporting observations and defects using a QR code was implemented in SharePoint. This system allows anyone present at the Haizea Bilbao plant to report through a form unsafe behaviours or defects at the facility. The reports are grouped in a list that is monitored weekly, allowing detailed tracking of defects by area until they are resolved. Observations of unsafe behaviours are analysed and, when necessary, reinforced through SOPLs, recalling the safety standards that must be met.

In addition, a foot scan campaign was carried out to improve the well-being of employees with podiatric problems, and special insoles and suitable footwear were provided. To promote the preventive culture among middle managers, weekly meetings were set up to answer any questions about occupational hazard prevention and support training in both existing procedures and new ones implemented.

In order to involve employees in safety issues, a contest about safety standards, called "Haizea Bilbao Safety Week", was organised, based on the game Kahoot. The contest was very well received, with prizes of Amazon gift cards, and the possibility

of holding more contests in the future is being contemplated.

In addition, the Kaizen 5M method for ongoing process improvement was implemented, starting with a thorough review of a position in the submerged arc welding process. The process included hazard assessment, a review of procedures, validation of the training given to employees and an evaluation of the machine, verifying that it complied with safety and quality standards, including the presence of the manufacturer's manual and its CE certificate. The defects found were recorded and are being monitored until they are resolved.

The work environment is also subject to improvement by applying the 5S principles to optimise workplace organisation, such as the correct arrangement of tools and equipment, as well as the signage and paintwork of the storage areas.

Lastly, audits with logs are being run to evaluate compliance with safety and operational standards.

### Occupational health and safety conditions

We as a Group are committed to the occupational health and safety of our employees. The commitments we encourage are aimed at ensuring a safe working environment. The **safety** of our contributors (employees, customers, suppliers and subcontractors) is **absolutely paramount**. We implement rigorous safety measures and continuous training, which enable us to prevent accidents and aim for a safe working environment for all.

The main commitments we have acquired through the Integrated Health and Safety, Quality Management and Environment Policy are:

 Complying with current legislation on occupational hazard prevention and the environment.



 Promoting a culture of occupational health and safety in the activities of all our employees, guaranteeing our commitment to providing proper health and safety conditions, and the exercise of participation and consultation, and therefore complying with the highest health and safety standards, both those that are legislated and the organisation's own.

To ensure the monitoring and achievement of these objectives, Occupational Health and Safety Committees have been established, composed of company representatives and employees.

Within the new projects and studies, a push has begun for the different Group plants to share information on accidents and what has been learned.

In addition, we have External Prevention Services that include activities related to the specialities of occupational medicine, industrial hygiene, ergonomics and applied psycho-sociology, and safety at work.

At HWG we have specialist personnel who have duties that centre around the continuing improvement of our practices and procedures and obtaining and maintaining internationally recognised risk prevention system certificates, such as ISO 45001 certification, which we have at our plants (Haizea Bilbao, Haizea Tecnoaranda and Haizea WEC Group). This is the most important technical specification for implementing and managing occupational hazard prevention systems. It specifies the requirements for an occupational health and safety management system so that organisations can control occupational hazards and improve their performance and results in this area. By obtaining the certificate, which is completely voluntary, the Group has demonstrated its proactivity in exceeding the legal requirements and achieving excellence in occupational health and safety. Obtaining it brings with it improvement in all the aspects that have to do with the health and safety of the people in the organisation.

In addition to all the above, we have other policies, procedures and specific actions, with the objectives listed below, which are in line with the Comprehensive Health and Safety Policy:



#### Haizea Bilbao

We have a **department for the improvement** of production tasks, composed of three people, which has a close relationship with Occupational Hazard Prevention and designs different customised aspects to improve safety and health.

**Observation CAR:** A suggestion box for employees to express any aspects of health and safety that they believe should be improved. This mailbox is checked weekly by the HR manager.

**Toolbox:** Safety talks at shift changes to discuss aspects that are wrong and what the improvement would be.

**Policy** for preserving the health and safety of our people, associated with alcohol and drug use prevention.

In addition, a major effort has been made **to improve the health and safety management and documentation system**, especially the following:

- Critical equipment procedure, which defines the method for evaluating the criticality of equipment, which will be taken into account when drafting specific instructions, among other aspects.
- Procedure for infractions and sanctions, which establishes a system of disciplinary actions in the event of breaches of internal Health, Safety and Environment standards, aimed at reinforcing the importance of respecting those standards and initiating cultural change and a proactive attitude towards these matters in all staff.
- ATEX facilities procedure, which establishes
  the main areas in which explosive atmospheres
  can be found in the plant and defines the key
  measures for avoiding them.
- Lifting plans: they contain the instructions for moving loads using the equipment available at the plant.
- Improvement of PPEs, focusing on ensuring employee comfort in relation to equipment such as welding masks and footwear.

#### Haizea Tecnoaranda

**Own software** for improved management of accident rates, accidents, incidents, periodic controls, assessments and preventive measures to be applied.

**KPIs:** periodic monitoring of the main indicators, conducting the relevant investigations into accidents, improvements, reports, etc.

**Audits:** weekly audits are made of working conditions and the condition of the workshop.

In addition to the above, **meetings are held with employees** whose job is associated with greater danger, and with employees who have been involved in an accident, both with and without sick leave.

**Risk assessment by job:** For each job, an assessment has been conducted to identify the risks associated with it. In addition, training courses in occupational health and safety have been provided, which differ according to the job done. A risk assessment has also been made of all the machinery and sections, plus assessments of certain specific jobs, e.g., changing the roof.

**Hygiene Assessments:** Measurements are taken of exposure to chemicals, noise and electromagnetic fields.

**Training:** In 2024, the recycling training specified in the collective bargaining agreement was conducted with all employees who had completed their initial training four years previously. In addition, we resumed theoretical and practical training in areas such as working at height, working in explosive



atmospheres, ergonomics and postural hygiene, and electrical work.

The **Tecnoaranda Academy**, a new online training platform available to all employees, was also launched. As part of the presentation of the platform to employees, training was given in noise, ergonomics, confined spaces, electromagnetic fields, gas bottles and other subjects.

Psychosocial risk assessment: A psychosocial risk assessment was conducted by contracting a prevention service and administering a survey using the FPSICO method. The purpose of this assessment is to analyse the aspects of work associated with the organisation, the content and performance of tasks that could affect both the well-being and health (physical, mental or social) of employees and job performance. Taking into account the fact that psychosocial factors can affect motivation and job satisfaction and cause stress depending on the employee's perception of these factors and ability to cope with or respond to them, Haizea Tecnoaranda has seen this psychosocial risk assessment as an opportunity to obtain a snapshot of how the company is doing in these areas and devise preventive measures to improve the situation.

Work instructions: To ensure process standardisation and safety, we have specific work instructions known to all employees.

Weekly Safety Meetings: We hold weekly meetings at which the most important safety issues are discussed, such as accidents, non-compliance with OHP, incidents and periodic plant control. In addition, after the meeting, the minutes are made available to all employees.

Visitor safety induction video: Before visitors enter the plant, an explanatory video is made available so that they know the main rules and procedures to follow.

Medical examinations: The organisation encourages and promotes the monitoring of the health and well-being of our employees. Each employee therefore undergoes an annual medical examination that meets the protocols established by the occupational medicine specialist based on the data from the risk assessment for each job.

Information boards: To enhance the company's communication with employees, information boards display accidents and the status of the investigations, the results of hygiene measurements, the members of emergency teams, the training courses to be given, etc. There are also screens in the manufacturing area on which safety information and messages can be displayed and a suggestion box for communication with the safety department. In addition, we have a new human resources platform, META4, which also sends safety information to employees.



#### Haizea Grupo WEC

In the third quarter of 2023, the post of Health and Safety Manager was added to the company, with the resulting promotion of all activities related to the matter. Its aim is to raise awareness among all staff of the importance of these issues and to incorporate them across the board into all areas, from design to the production process, thereby reinforcing the plan for a culture of prevention, to raise awareness and inculcate safety values in the plant's daily routine.

We have different **procedures**, such as the contingency plan, environmental emergency plan, preventive activity planning, occupational hazard assessment, health monitoring, emergency plan, monitoring of new processes, communication and participation.

We should highlight the following initiatives, which either started in 2024 or were continued from previous years:

- In 2023, the foundry unit Health and Safety
  decalogue was reviewed and improved, and
  a schedule drawn up for developing specific
  work instructions for the most critical aspects
  and where it is most difficult to implement
  health and safety measures. The development
  of these instructions continued in 2024, and
  they are being constantly updated based on the
  requirements at any given time.
- "Safety hour": This is an activity at the foundry that aims to enhance the culture of prevention and show that managers are going in a specific direction in this regard. It occurs weekly and mostly involves personnel more related to operations to detect possible risks and identify improvement actions, for which supervisors and implementation schedules are defined. The process consists of a multidisciplinary team of four or five couples taking safety walks around the plant to observe tasks, the facility and behaviours to implement, improve or correct safety aspects.

- "Weekly Safety Dialogue (DDS)": This is an activity every Monday, in all shifts, when a specific safety-related issue is discussed by the middle managers and their staff (e.g., incidents that have occurred or the use of forklifts). The health and safety department monitors the quality of these communications.
- Accident investigation process: In 2023, the accident investigation procedure was amended with the aim of improving the quality of investigations and the solutions provided, focusing particularly on the most serious or potentially serious incidents. Accidents are therefore classified by severity (A, B and C), with each type of accident corresponding to an investigatory method: type A accidents are mandatorily investigated using an Ishikawa diagram or a cause tree, while for B and C the "5 whys" method or an Ishikawa diagram or cause tree can be chosen. This way the accidents that have occurred are evaluated and the necessary safeguards put in place to ensure they do not happen again.
- Monthly Prevention Forum: Health and safety
  KPIs are analysed and the measurements that
  will be done throughout the month are reported.
  In 2024, these forums focused in particular on
  risk detection, action tracking and accident
  investigation.
- Constant communication between the health and safety manager and the section heads and shift supervisors, whom he/she accompanies on weekly plant inspections.
- Safety benchmark: an in-depth search was conducted for the best health and safety practices in the sector to improve processes and measures internally.
- Meetings after returning to work: with the aim
  of lowering the accident rate, the practice of
  holding a meeting led by the Human Resources
  Department with the people who rejoin the



team after sick leave has been established. At these meetings, the employees are informed of any improvements implemented, the result of the investigation is shared and the opportunity is taken to follow up on the absenteeism KPI. The employee also tells his/her section about the incident to raise awareness among the rest of the team.

• **Training sessions:** In 2024, Haizea Grupo WEC focused its efforts on increasing the hours of

training in Health and Safety. This year, not only the training regulated in the agreements took place but also training in other subjects, such as the Group's emergency plan, training in silica, in explosive atmospheres, etc.

• **Suggestion box:** In 2023, the improvement department opened a box to receive proposals for health and safety improvements. It is still in open.



### Safety management with subcontractors

To provide our products with the best quality parameters, at **Haizea Wind Group** we combine the efforts of our team with the support of specialist companies to carry out certain activities.

As with our teams, we focus our efforts on promoting a safe working environment for the staff of subcontractor companies who are working at our plants.

Prior to the start of the work, we ensure that all subcontractors have up-to-date labour and safety certificates and give them our manuals and safety instructions. In most of the Group companies we use digital platforms to send information, ensure the reading of/training in security measures and check personnel on entry.

The incidents that occur with subcontractor companies are included in our procedures for the investigation and continuing improvement of safety measures when accidents occur. Our safety inspection staff also monitor both our teams and external personnel who are working at our plants.

We have a number of channels and contact points for dealing with health and safety issues with our contributors. The most significant subcontractors report to us on the safety talks/trainings they give each week, as well as the periodic checks that they carry out. In addition, prior to the start of the work, meetings are held with the subcontractors, with the Prevention and Maintenance service's participation.

In 2024, the inclusion of subcontractors in all procedures associated with health and safety increased by inviting the regular subcontractors to different information meetings at the company's facilities. As part of this inclusion, it should be noted that subcontractors have been included in the new accident investigation procedure, as well as the other work instructions. All accidents involving subcontractors' employees are therefore considered by the Group to be internal accidents, so the process for their investigation also includes a manager from that subcontractor.

#### **Health and safety monitoring indicators**

At **Haizea Wind Group** we firmly believe that health and safety is an essential priority issue due to the nature of our business. Our goal is always "zero accidents" and the action guidelines come down from the highest levels of the organisation. This objective is applicable to all those involved in the Group's facilities.

**Haizea Wind Group** studies the accident rate and calculates the frequency and severity indices, as shown below:

- Accident rates by gender		2023	202	
	Men	Women	Men	Women
Frequency index	67.47	-	67.47	-
Severity index	2.05	-	2.05	-
Occupational diseases	2	-	2	_
Number of deaths	_	_	_	_



Despite our efforts to reduce accidents, in 2024 our frequency and severity indices increased, mainly due to the increase in accidents with long-term sick leave at Haizea Bilbao and Haizea Grupo WEC.

With regard to subcontractor companies, accident monitoring began in 2023, with the following figures:

	2023			2024
Accidents involving subcontractors/contractors	Men	Women	Men	Women
Number of work- accidents without sick leave	1	0	5	0
Number of work- accidents with sick leave	4	0	7	0



#### 6.3.4. Industrial relations

#### Organisation of industrial dialogue

In accordance with current regulations, the working conditions and rights of **Haizea Wind Group** employees, such as freedom of association and union representation, are included in the standards, collective bargaining agreements and specific agreements signed, where appropriate, with the corresponding employees' representatives.

Dialogue and negotiation are part of the way to address any differences or conflicts with Group employees. The main channels for communication with employees, in addition to trade unions, are physical noticeboards, conversations through the Works Council and Health and Safety Council, internally distributed emails and in-person meetings.

In addition, we have employee portals that allow us to handle different internal procedures, such as issues related to payroll and other human resources issues, in addition to their being used as a document manager so that all employees have access to policies, protocols and work schedules, among other documents.

# Percentage of employees covered by a collective bargaining agreement by country

100% of employees are covered by the applicable collective bargaining agreements. Haizea Bilbao has its own collective bargaining agreement, signed in 2024 and valid for three years. This new agreement has been especially important for the stage of growth the plant is experiencing, and it has focused on digitisation, work-life balance, and talent management and retention.

Similarly, at Tecnoaranda the steel and metallurgical industry collective bargaining agreement is applied. It will be in force until 2026. Lastly, in the case of WEC, each plant has its own agreement. In the machining and treatment plant the applicable agreement will remain in force until



2026, while in the casting plant the agreement is being renegotiated. It expired last December.

# Balance of the collective bargaining agreements (particularly in the field of occupational health and safety)

Haizea Wind Group complies with the conditions established in the applicable collective bargaining agreements, checking and tracking these conditions through the Health and Safety Committee, which meets regularly at least every two months and is made up of equal numbers of employees' representatives and company representatives, and is always attended by the External Prevention Service, as a guest.

The meetings of the Health and Safety Committee address the issues listed in advance on the agenda, all of which relate to employee health and safety. The result of these meetings is recorded in the minutes, which includes all the topics discussed with an indication of the department or person who must enact the security measures and a forecast of the execution dates.



#### 6.3.5. Training

At **Haizea Wind Group** we know that training all our employees is the basis of the Group's growth and success. We recognise, therefore, the strategic value of correctly managing learning by developing initiatives, processes and procedures that permit all our groups real and effective development. Our objective is to share any and all knowledge existing in the Group, as well as to progressively and increasingly generate expertise and training in employees in line with the organisation's strategy. Our commitments regarding training are reflected in the corresponding policies.

To implement these objectives, there are annual Training Plans, which are developed specifically for each role. Training Plans are developed based on the identification of employee training needs. At the end of the year, the existing needs are identified (using interviews by area, competency matrices for jobs, strategic plan, etc.) and then included in the plan for the following year. The objectives for knowledge management that we take into account are the following:

- Defining the knowledge required to perform the job.
- Establishing a system for detecting knowledge within the organisation.

- Implementing models that permit knowledge to be distributed and shared within the organisation.
- Detecting training gaps in the organisation.
- Developing training plans that help to improve knowledge.
- Creating media to store and distribute knowledge.

Based on the scheduling for the training actions in the Training Plans, each manager, with the training technician, monitors and coordinates the execution of the training activity.

In this context, in 2024 we developed training actions suited to the needs of our people, bringing the total number of training hours to 18,751 (16,079 in 2023), with an approximate investment in 2024 of 437,000 euros (242,000 euros in 2023).

The main topics addressed in the training activities offered were the following:

- Occupational Hazard Prevention.
- Specific safety training for jobs with higher accident rates.
- Action guidelines for emergency situations.
- Specific job training at Haizea Tecnoaranda (painting, maintenance).
- Coaching.
- Leadership training and teamwork.
- Advanced Product Quality Planning (APQP).
- Excel.
- Power Bl.
- · Languages.
- Training on the new Equality Plan at Haizea Tecnoaranda.

In addition, having digitalised numerous aspects related to labour relations between the Group and employees (such as the intranet, time management and the holiday request process) and having added work-from-home as a work-life balance measure has resulted in the need to provide a variety of

training courses on digitisation. Various staff trainings have therefore been planned for 2025, taking into consideration the different levels of digitisation in the workforce.

The distribution of hours by professional category for 2023 and 2024 is as follows:

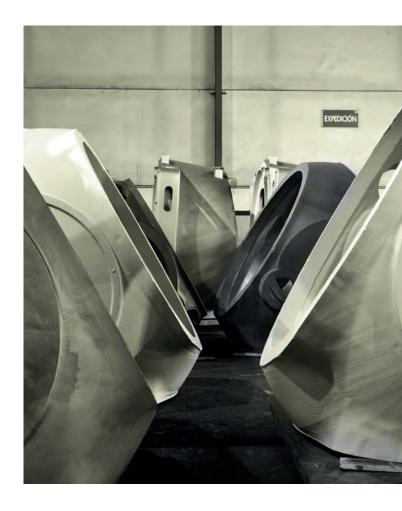
Training hours by professional category	2023	2024
Managers	557	460
Technical staff and middle management	7,341	4,016
Administrative staff	165	61
Workers	8,016	14,213
Total	16,079	18,750
Average number of training hours per employee	13.7	10.05

In the field of training, the *HWind* training programme, developed by Haizea Bilbao with the School of Business Administration at the University of Mondragón is worth mentioning. Seventeen employees took part in it in 2023. This programme, which was extended into 2024, has two main objectives:

- Business objective: to assist people in positions of responsibility to develop business and management skills to gain knowledge and/or take on new responsibilities within the company.
- Learning objective: to provide participants
  with the skills needed to assume greater
  responsibilities for their strategic context and
  the continuing growth of the company.

Lastly, reference should be made to the creation at Haizea Tecnoaranda of the "Tecnoaranda Academy", a new training portal that has been made available to all employees at the plant.

Because of this portal, the training topics have increased significantly. Of note are the training in Compliance, the Equality Plan, Information Security, criminal risks and also other cross-cutting subjects.





#### 6.3.6. Accessibility

Any new investment in industrial and service buildings in the physical settings of Group companies, as well as any adaptation or refurbishment of general service equipment and facilities, is planned in accordance with the regulations and the accessibility standards for that place.

#### **6.3.7. Equality**

At **Haizea Wind Group**, diversity management and support for equal opportunities are intrinsic to our management. The General Code of Ethics and Conduct promotes respect for the principles of equal opportunities, diversity, respect for people and non-discrimination based on race, colour, gender, sexual orientation, language, religion, political or other opinion, national or social origin, economic position, disability or any other condition.

Faithful to the commitment assumed in our Code to guarantee the protection of the fundamental rights of individuals, we have a protocol against sexual and gender-based harassment, which aims to establish the measures required to ensure prevention against and action in the face of any type of harassment at work.

The main management body for complaints or communications regarding harassment is the Ethics



and Compliance Committee, which is responsible for managing and resolving all complaints, grievances, claims, suggestions or queries regarding situations of harassment that have not been resolved with an informal process.

The Group has Equality Plans that are distributed to the entire workforce and are posted on the intranet. The Equality Plans include a diagnosis of each of the human resources issues that affect equality and specific action areas are indicated, such as recruitment, hiring and promotion, training, salaries, mutual responsibility, harassment prevention, and communication and awareness-raising. All this has the aim of establishing measures to achieve real equality between men and women, ensuring full and effective compliance with the principle of equal treatment for women and men and not tolerating conduct or actions that involve or could potentially involve, directly or indirectly, gender-based discrimination.

The actions implemented are tracked and documented in an annual report, which is also distributed to employees. To ensure compliance, there is an Equality Committee, and awareness courses have been held for employees.

These plans are reviewed and updated regularly. A new Equality Plan was agreed at Haizea Tecnoaranda in 2023, which incorporated issues relating to work-life balance and disconnection from work. In 2024, both Haizea Bilbao and Haizea Grupo WEC developed an Equality Plan, which is expected to be approved by 2025.

It should be noted that at Haizea Tecnoaranda we have an Integration Policy in which we are committed to working on the integration into the workforce of the different groups at risk of social and occupational exclusion. The principles on which this Policy is based, which also govern the actions of the other Group companies, are:

 Having no prejudices or stereotypes: professionals are valued for their professional skills and personal attitudes, not for their status, gender or physical abilities, unless these really prevent them from carrying out their tasks. Otherwise, they should not be taken into account.

- Objectivity, the key to labour market integration: establishing a precise job search that focuses on the gaps in the organisation and ignoring other aspects facilitates recruitment based on inclusive criteria.
- Culture of equality: hiring professionals who believe in labour market integration is one of the best policies. People make an impact both with their performance and their ability to influence others regarding labour market integration.

Inclusion and participation: occupational inclusion is fostered and improved when the people hired can contribute and express their ideas. This evaluation improves their commitment and helps them to be recognised within the organisational structure based on their professional skills.

Lastly, it should be noted that at Haizea Grupo WEC a protocol for the prevention of harassment, acts of occupational violence and acts of workplace violence is being developed, which will come into force in 2025.





# 7. Information on respect for human rights

#### 7.1. Group policies

Haizea Wind Group has several policies with ethical, responsible and sustainable parameters to maximise our positive effect and spearhead advances, including:

The General Code of Ethics and Conduct, which encompasses the solid sustainability strategy that allows the Group to voluntarily comply with high social and environmental standards and commitments to transparency and responsibility. This code assumes the commitment to act at all times in accordance with the United Nations

Global Compact, the aim of which is the adoption of universal principles in the areas of human and labour rights. All the Group's actions must scrupulously respect the Human Rights and Public Freedoms included in the Universal Declaration of Human Rights.

As the key milestone for 2024 in this respect, the **Haizea Wind Group** as a whole has joined the **United Nations Global Compact**, demonstrating its aim of adopting the practices contained in it at the corporate level.

#### 7.2. Key risks identified

In relation to human rights, management has identified risks which, while not being considered significant given the fact that our plants are mostly located in Spain, are still subject to periodic review because of the possible impact they would have if such risks did appear. The following key risks have been identified:

- Infringement of the principle of equal treatment and/or discrimination at work.
- Lack of freedom of association or collective bargaining.
- Insufficient integration of people with disabilities.

The measures and plans for their mitigation that have been implemented in these areas are described in the following sections.





#### 7.3. Management and performance related to Human Rights

## 7.3.1. Prevention of the risks of violation of human rights and, where appropriate, measures to mitigate, manage and repair possible abuses committed

At **Haizea Wind Group** we respect and promote human rights, as we consider them to be fundamental and universal in accordance with internationally accepted laws and practices, such as the United Nations Declaration of Human Rights, the International Labour Organisation and the principles of the Global Compact.

Among the rights that we consider fundamental are:

- The right to non-discrimination based on race, creed, colour, nationality, ethnicity, age, religion, sex, sex change, sexual orientation, marital status, connections to a national minority, disability or any other condition.
- The right not to endure arbitrary detention, execution or torture.
- Freedom of peaceful assembly and association.
- Freedom of thought, conscience and religion, and freedom of opinion and expression.

At Haizea Wind Group we are committed to offering fair pay and working hours, and facilitating a healthy balance between work and private life. Furthermore, we declare our commitment to establishing and implementing policies that include equal treatment and opportunities for women and men, without directly or indirectly discriminating on the basis of sex, as well as promoting and fostering measures to bring about real equality within the organisation by establishing equal opportunities for women and men.

In the General Code of Ethics and Conduct, we explain the Group's principles, of which the following are related to human rights:

- Each and every one of the members of the Group is required to scrupulously respect the Fundamental Rights and Public Freedoms contained in the 1948 Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights of 16 December 1966, the International Covenant on Economic, Social and Cultural Rights of 16 December 1966, the Spanish Constitution of 1978 and any regulations aimed at the protection and observance of the fundamental rights and public freedoms recognised in Spanish territory.
- No subcontracts will go to companies that do not respect workers' rights, the provisions relating to occupational health, safety and hygiene, including those relating to the prevention of occupational hazards, or have hired personnel whose employment status does not comply with the provisions of current legislation.
- To the best of its ability, the Group will assist employees, managers and administrators who so request in achieving their career aspirations.

At **Haizea Wind Group** we do not use child or forced labour. We do not tolerate working conditions or treatment that are in conflict with international laws and practices.

We are committed to providing fair remuneration and working hours.

#### 7.3.2. Complaints for cases of human rights violations

Haizea Wind Group has provided Group employees with an Internal Communication and Complaints Channel to promote compliance with the General Code of Ethics and Conduct, through which they can report everything that can be considered a breach of that code.

The channel allows them to report incidents or situations that are or may be contrary to the General Code of Ethics and Conduct and its policies and procedures, contrary to good business practices or against the law.

In order for everyone in the Group to be able to immediately report any actual or potential breach, we have made several methods of communication available to employees:

 By post (or any alternative means that permits an acknowledgement of receipt).

- Using the telephones provided for this purpose at Group facilities.
- By email to the Ethics and Compliance Committee.
- Over the website.

All cases that arise are studied and if any breach of the policies is identified, appropriate action is taken. The Ethics and Compliance Committee therefore has a specific protocol for handling the complaints received.

In 2024, two complaints were received through this channel and the two complaints from 2023 are being processed.

# 7.3.3. Promotion of and compliance with the provisions of the fundamental ILO conventions related to the respect for freedom of association and the right to collective bargaining

As mentioned above, the General Code of Ethics and Conduct contains the principle of eradicating child labour, so no Group company or supplier will resort to child labour and must ensure compliance with the International Labour Organisation (ILO) provisions on child labour.

Another of the principles that the Group has dealt with is "Respecting freedom of association and the right to collective bargaining", since employees, without any distinction, have the right to join or form the trade unions of their choice, as well as to bargain collectively.





# 8. Information on anti-corruption and bribery

#### 8.1. Compliance and Good Corporate Governance

#### 8.1.1. Group Policies

At Haizea Wind Group, we do business by publicly declaring our commitment to acting ethically and transparently as an essential factor for generating value, improving economic efficiency and strengthening our stakeholders' trust. In recent years we have been developing a Compliance System, which is based on the recognition of the fundamental importance of our establishing an ethical culture of compliance and zero tolerance for criminal acts and behaviours.

In June 2023, two independent directors were appointed and an Audit and Compliance, Appointments and Compensation Committee and Strategy and Investment Committee were set up.

We have an **Anti-Corruption Policy**, the purpose of which is to respect the fundamental principles of the United Nations Convention Against Corruption, and we undertake to work against corruption in all its forms, including extortion or incitement to crime, bribery, conflict of interest, influence peddling, documentary forgery, money laundering, the use of privileged information and fraud, resulting from any of the practices mentioned above.

The Group's **Criminal Risk Prevention (CRP) Manual** is intended to formalise this commitment, as well as for its business to be conducted in a socially responsible manner, acting with a philosophy of zero tolerance for acts that contravene its organisational principles. We also have a Criminal Risk Matrix, kept up to date by the management and departments of Haizea Bilbao, Haizea Tecnoaranda and Haizea Grupo WEC, all of which are supplemented by a Criminal Risk Report.

An Action, Training and Reporting Plan has also been created to serve as a guide for the body tasked with monitoring, reviewing and verifying this CRP System.

These principles and behaviours are reinforced by the Group's Code of Conduct, which aims to ensure that day-to-day operations are conducted in an ethical, serious, professional and honest environment in accordance with the principles of good governance, contractual good faith and full respect for the law.

We also have a **Catalogue of Prohibited Conduct** that complements the Code of Conduct. It is applicable to all our human team, administrators, contractor companies that lack internal procedures or codes of conduct equivalent or comparable to





those we have implemented in the Group, and third parties dependent on our organisation.

The above documents define and establish the principles for action and behavioural guidelines that

must govern the actions of the Group's directors and employees in the exercise of their duties in regard to the prevention, detection, investigation and redress of any practice.

#### 8.1.2. Key risks identified

The Criminal Risk Matrices developed served as a starting point for the identification of the key risks that affect the different **Haizea Wind Group** companies in terms of compliance.

Firstly, the hypothetical criminal risks associated with the activities that take place in Group companies which, in accordance with article 31 b of the Spanish Criminal Code, could lead to the criminal liability of the legal person or the ancillary consequences provided for in art. 129 of the Criminal Code were identified and analysed. Secondly, once these risks had been specified, the general and specific control measures implemented by the companies to reduce their exposure to these

risks were listed in the **Haizea Wind Group** Criminal Risk Prevention Manual. Lastly, taking into account the probability of the risk arising, its impact on the activities and reputation of the organisation and the number of existing controls for its prevention, the inherent risk and the residual risk were determined for each of the companies.

The key risks that we considered are those related to activities such as relations with government departments, political or association-related activities, donations and sponsorships, relations with suppliers, relations with customers, and the offering, giving and acceptance of gifts or personal benefits.

#### 8.2. Managing the fight against corruption and bribery

## 8.2.1. Measures adopted to prevent corruption and bribery and against money laundering.

The Criminal Risk Prevention Manual, the Anti-Corruption Policy and the General Code of Ethics and Conduct are key tools for preventing possible corruption, bribery and money laundering activities. In addition, we have an Ethics and Compliance Committee, whose duties include the management of the Internal Communication and Complaints Channel for reporting breaches of the General Code of Ethics and Conduct and Criminal Risk Prevention Manual.

We encourage our human team to act with integrity, diligence and impartiality in decision-making and

in relations with third parties. For this purpose, in addition to the protocols and procedures mentioned, we have internal prevention measures, among which we should highlight the following:

- The use of transfers as the method of payment for amounts due to external suppliers.
- There is a mechanism that ensures the documenting and filing of all income received, as well as the issuing and/or approval of invoices.

- Knowledge, in the form of a public document, of the specific individuals who have been granted the power to make contracts on behalf of the company.
- Limitation of corporate cards to the Sales
   Department and the Management Office.
- Verification procedure for anticipated expenses.

At **Haizea Wind Group** we strictly prohibit bribery and corruption of any kind relating to the Group's professional activities. Individuals who are discovered to have participated in a case of bribery or corruption will face disciplinary action up to and including termination of employment and may face financial penalties and criminal prosecution.

#### 8.2.2. Contributions to foundations and non-profit entities

All our contributions and collaborations in the area of social action are part of our business strategy and are based on responsibility to our local community and the identity of **Haizea Wind Group**. We work with foundations and non-profit organisations that operate in children, health and food-related areas. In 2024 we carried out the following social action initiatives:

- In 2024, the Group made a donation of 10,000 euros through Cáritas Diocesana to support to those affected by the severe weather event in Valencia. In addition, various group plants coordinated the collection of materials and their shipment to the affected areas.
- In 2023, the Group engaged in a charity action consisting of the collection of clothes and

school supplies for an orphanage located in Eswatini (formerly Swaziland). This is a home for 175 children between the ages of 2 and 18. In December, the materials collected (approximately 300 kilos) were shipped and we assumed the logistics costs.

- Collaboration with a special disability job centre to put together Christmas baskets given out to employees at Haizea Bilbao.
- Blood donation campaigns at Haizea Tecnoaranda.
- Haizea Tecnoaranda helped organise the March against Cancer in Aranda de Duero.





### 9. Information on the company

#### 9.1. Commitment to sustainable development

At **Haizea Wind Group** we engage in activities that contribute to the well-being and improvement of the communities in which we operate. We contribute to economic and social development through a plethora of initiatives and programmes. The most significant in 2024 are listed below:

- Haizea Wind Group participated in the
  University of Deusto's 19th Job and
  Entrepreneurship Forum and Javier Martín
  Baniandrés, Commercial Director of the
  Haizea Wind Group Towers division, spoke
  at the "Business Leaders in Environmental
  Technologies" and "Supporting Your Future"
  presentations.
- Haizea Wind Group took part in the "Student Inspirational Panel" during the 2024 WindEurope Fair. At that event, the speakers shared their personal experiences and discussed the key skills demanded by the industry, as well as what it can offer emerging professionals.
- Haizea Grupo WEC was present in November 2023 at a conference organised by the Association of Entrepreneurs of Guipúzcoa (ADEGI), "New Cultures Gunea", which defines itself as a meeting place between companies that are working on new company culture and young people who are studying their last vocational training courses or at university.
- Collaborations with universities and training centres to promote job creation, the development of environmental professionals and dual training. In this area, we are working with the Somorrostro Training Centre, the University of Valladolid, the University of Mondragón, the University of Deusto, the Public

University of the Basque Country, the University of Burgos and vocational training centres in Burgos.

This year saw the approval of the Sponsorship Policy, which aims to contribute to the wellbeing of our community by allocating resources to investment initiatives in the community, sponsorships and donations to non-profits. This document sets out the principles and framework within which these initiatives can be implemented.

- Sponsorships:
  - Batzarre Sports Association
  - Zumaia Triatloia
  - Itziar Trail
  - Anima Deba
  - Ibilaldi 2024
  - Riber Aranda Football Club
- Associations:
  - European Wind Tower Association
  - Wind Business Association
  - Energy Cluster Members
  - Associates and board members of the Biscay Federation of Metal Companies
  - Basque Country and Navarre Association of Founders
  - Álava Business-owners' Association
  - ADEGI
  - Armeria Eskola
  - AERCE
  - Offshore Wind Foundation Alliance

Haizea Wind Group promotes quality jobs by pulling each of the levers that form part of the process of attracting and retaining talent. From attending forums specialising in recruitment and working in conjunction with public institutions to



training and development, people development and performance evaluation programmes.

Through a cooperation agreement with the Somorrostro Training Centre, at the end of 2022 Haizea Bilbao created Soldarte, a welding school managed by the training centre and opened on company premises. Two main objectives are pursued with the creation of this school:

- Launching a school teaching welding to help the unemployed join the labour market, people already working who are seeking better jobs and people who are working and need retraining.
- Offering a response to the needs of companies in Bizkaia to hire backgrounds related to different welding process technologies, such as submerged arc, TIG and semiautomatic welding, as well as the handling and manipulation of heavy components..

This project is aimed at people belonging to groups with fewer possibilities of employability or with low numbers in industrial processes, such as young people at risk of exclusion, women, people over 45 years and the long-term unemployed. Soldarte

opened its doors in early 2023 and trained more than 225 people that year. Soldarte is still operating and the training has been expanded to continue preparing the students from the first year for the needs and skills of each different profile.

Trainees have also joined both Haizea Bilbao, as part of the Provincial Council of Bizkaia Department of Employment, Social Inclusion and Equality 'Gazte On' programme, and the Haizea Grupo WEC casting unit, through an IHOBE (Basque Government Environmental Management Public Company) programme to develop the product footprint calculation project.

As part of the process of attracting and retaining talent, in 2024 three UPV engineering students joined the Haizea Bilbao workforce through the centre's Business Classrooms to work on a joint project. Work is also being done on formalising the scholarship process, with the preparation of guides for scholarship holders, tutors' guides and specific procedures for welcoming scholarship holders.

In relation to the promotion of local jobs, it should be noted that 91% of all employees are local (92% in 2023).

#### 9.2. Subcontracting and suppliers

At **Haizea Wind Group** we choose suppliers that can not only demonstrate the desired combination of quality, commercial competitiveness and innovation, but also, more importantly, those that do so in strict compliance with the applicable laws and foster a positive, safe and ethical workplace. Therefore, in the general terms and conditions for purchasing we include aspects of respect for society and the environment.

In the case of Haizea Bilbao, the general contract terms and conditions require that suppliers and subcontractors comply with our general code of ethics and conduct. At Haizea Tecnoaranda, despite the fact that most of the suppliers we work with are imposed by our customers, the Third-Party Code of Ethics is shared with them at the same time as the customers' own audits and approvals. With respect to environmental criteria, we prepared a certificate to be signed by our suppliers regarding the proper management of their waste and a chemical blacklist. Similarly, information and intellectual property security is handled properly by sending out a confidentiality agreement.

Haizea Grupo WEC has developed its own Third-Party Code of Ethics, which must be signed by



all new suppliers who want to work with us. It has been included in the supplier evaluation and approval loop and it is reviewed annually to ensure that all suppliers have signed it.

In line with our vocation to have two-way communication with our suppliers, Haizea Grupo WEC sends out a biannual supplier survey to find any room for improvement. Once the results have been analysed, meetings are held with the suppliers with the lowest scores.

#### **Monitoring and audit systems**

Each Group business has set up systems for monitoring and auditing suppliers according to their needs and criticality.

At Haizea Bilbao, a supplier approval and certification process is carried out that takes into account both quality and environmental and health and safety criteria. There is a product criticality list that specifies the minimum criteria that must be met, depending on the family to which they belong.

At the end of a project, suppliers are evaluated from different points of view (commercial, logistics, quality, services) by the different departments involved in the project. Based on the assessment, they are assigned a score from 1 to 100. If the supplier is rated below 75, corrective/improvement actions are recommended.

As we mentioned earlier, Haizea Tecnoaranda does not participate in auditing its suppliers directly; instead, they are audited by the customer.



#### 9.3. Clients

At **Haizea Wind Group**, our clients are our priority, which is why we work so that our solutions meet their specific needs, while meeting the highest standards of quality and safety in their uses.

Our products take into consideration all the safety parameters listed in the regulations applicable to each case to provide an acceptable level of protection for the people and goods that they use or are in contact with our equipment. Each component that we manufacture must meet the highest market standards, thereby ensuring the trust and return of our customers, which allow us to

be a group that is appreciated by its customers and whose business is sustainable.

All our production plants have procedures and quality control points throughout the entire production process to ensure compliance with the highest standards. We also conduct non-destructive testing, and collect dimensional data and data on certificates that are delivered as documentation with our product, such as quality dossiers for the customer. We have both external and internal quality inspectors. Due to our commitment to quality, it should be noted that our



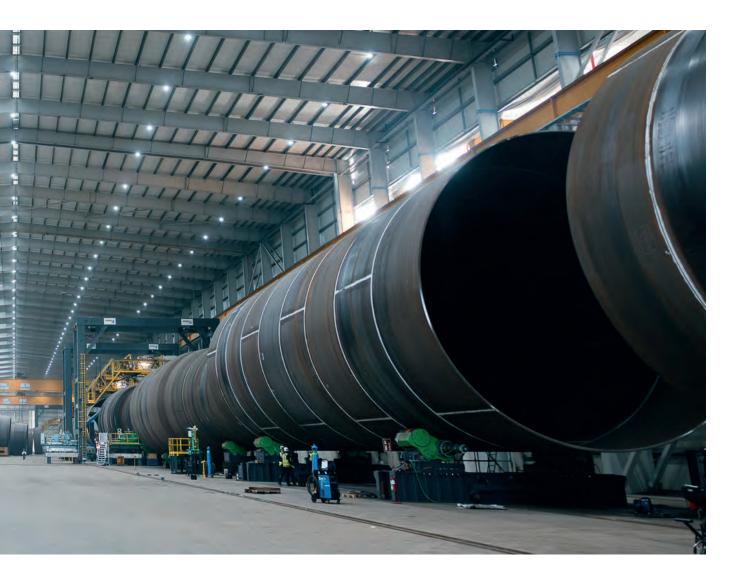
plants (Haizea Bilbao, Haizea Tecnoaranda and Haizea Grupo WEC) are ISO 9001 certified.

In 2023, Haizea Tecnoaranda updated its Quality Policy, and the Group is developing a standardised Quality Policy for all its companies that emphasises our commitment to quality.

The great work of our teams has led us in recent years to meet major approval milestones for important projects and customers, including the following:

 Supply and manufacture of more than 70 transition pieces for the Baltic Power offshore wind farm in the Polish Baltic Sea. Selected Supplier Agreement between Bilbao – Smulders and Haizea Bilbao S.L. Achievement of the award as suppliers to the largest offshore wind farm in the world, with a total capacity of 3,600 MW.

 Construction of 123 8 MW wind turbine towers designed by Siemens Gamesa that will form the Yeu-Noirmoutier and Dieppe Le Tréport wind farms in France, to be constructed between 2024 and 2026. The project will be implemented in conjunction with SPIE Industrie, a French subsidiary of SPIE, which will assemble the internal mechanical and electrical components used in some sections of the towers at its facility in the port of Brest.





 Supply and manufacture of fifty monopiles to support the wind turbines of the East Anglia Three (EA3) offshore wind farm that Iberdrola is building in UK waters. This renewable complex will generate 1.4 GW, enough to cover the energy consumption of almost one million homes on the island.

#### **Complaints and grievances system**

Customer satisfaction is key for the Group, which is why we have a customer satisfaction evaluation process, in which we periodically conduct satisfaction surveys. In the businesses in which satisfaction surveys are not conducted, the sales representative responsible for that customer writes an evaluation report. We also have a KAM (Key Account Manager) for each customer who is responsible for handling all issues relating to that customer.



In addition, we have implemented a complaints and grievances system in the Group that is adapted to the circumstances of each business. Incidents are received using any of the formal and informal means made available to customers and they are managed and processed by our specialist staff. Our team analyses the reason for each incident on an individual basis and takes the appropriate measures to provide a solution to the customer that meets the quality standards required by **Haizea Wind Group**.

With the aim of reducing complaints and increasing product quality, at Haizea Bilbao we have included the customer in the assembly preparation process to respond to the increasingly innovative demands of assembly in offshore projects.

In the businesses where it is necessary due to the complexity or volume of their operations, we have an incident recording tool that allows us to improve the quality of the service and take corrective action to optimise its management. It should be noted that in all the businesses claims are monitored periodically, identifying at least the type of claim, its status (resolved, in process, etc.) and the date of its closure. To do this, the businesses have procedures for handling non-conformities and for handling preventive/corrective actions.

#### 9.4. Information security and cybersecurity management systems

The Group considers it key to promote a culture of cybersecurity and privacy by ensuring that all employees have the necessary information and knowledge to minimise exposure to cybersecurity risks. It should be noted in this regard that Haizea Bilbao and Haizea Tecnoaranda obtained ISO 27001 certification, which establishes the requirements for the implementation, maintenance and continuing improvement of an information security management system.

The Group is continuing to adapt its processes to the other companies so as to achieve these

same objectives in the coming years. We therefore have an Internal Information System Policy, which aims to promote an information culture in those who make up the Group and those who are commercially, contractually or professionally related to the companies that make it up. Lastly, it should be noted that the Group has a series of specific procedures for handling information security that are mandatory for all employees. These include an Internal Information Channel for use by employees, representatives or third parties who require it.

#### 9.5. Tax-related information

#### **Group tax strategy and policy**

We are aware of the impact of good fiscal management on the economic stability of the countries and local populations where we operate. To comply with the applicable laws as well as to act responsibly with our stakeholders, we are governed by the following principles:

- Application of and compliance with tax regulations applicable in all the regions in which we operate.
- Promotion of responsible fiscal action, which prevents fiscal risk through effective and transparent risk management.
- Maintaining a relationship with the tax authorities based on the principles of good faith, collaboration and transparency.
- An assurance that the Board of Directors is aware of the fiscal implications of all its decisions.

The Group's Financial Management is the executive department in charge of ensuring compliance

with fiscal policy and bringing material issues to the attention of the Management Committee. The associated risks are dealt with monthly by the Group's tax team, assisted by external advisors on the most important issues.

#### **Economic results**

As shown in the Consolidated Financial Statements of Haizea Investments, S.L. and subsidiaries, the profit before tax for 2024 amounted to 14,800,000 euros (5,088,000 euros in 2023). Of this result, the foreign profit before tax was positive, 2,553,000 euros (4,632,000 euros in 2023).

In relation to the payment of profit tax in 2024, the result was a payment of 2,910,000 euros (223,000 euros in 2023), as indicated in the Cash Flow Statement of the Consolidated Financial Statements.

In 2024 the Group also received subsidies from public bodies, which are detailed in the financial statements of the Group's consolidated annual accounts.





# 10. Reference table of requirements of Law 11/2018 INF and contents of the Global Reporting Initiative (GRI indicators)

Contents of Law 11/2018 INF		Standard used (GRI)	Section	Notes
0.	Overview			
•	Brief description of the group's business model, which will include its business environment, its organisation and structure, the markets in which it operates, its objectives and strategies, and the main factors and trends that may affect its future evolution.	GRI 2-1, GRI 2-6, GRI 2-12	<ul> <li>00 Letter from the Chairperson</li> <li>02 Business model</li> <li>03 Identification of key risks and opportunities</li> </ul>	• The entities included in the consolidated financial statements (GRI 102-45) are included in the Annexes of the Consolidated Report for the end of FY 2023, so no express mention is included in this document.
•	Policies applied by the group, including the due diligence procedures applied to identify, assess, prevent and mitigate risks and significant impacts, and for verification and control, as well as the measures that have been adopted.	GRI 3-3	<ul> <li>04 Materiality</li></ul>	
•	Key risks relating to issues linked to the group's activities, including where relevant and proportionate, its business relationships, products or services that may have negative effects in those areas, and how the group manages those risks, explaining the procedures used to detect and evaluate them in accordance with the national, European or international frameworks of reference for each topic. Information should be included on the impacts that have been detected, providing their breakdown, in particular on the key risks in the short, medium and long term.	GRI 2-12, GRI 3-3	<ul> <li>04 Materiality Analysis</li> <li>5.2 Key risks identified</li> <li>6.2 Key risks identified</li> <li>7.2 Key risks identified</li> <li>8.2 Key risks identified</li> <li>09 Information on the company</li> </ul>	



Co	ntents of Law 11/2018 INF	Standard used (GRI)	Se	ction	Notes
1. I	nformation on environmental issues				
•	Current and foreseeable effects of the company's business on the environment and, where appropriate, on health and safety	GRI 2-12, GRI 308-2	•	5.2 Key risks identified	
•	Environmental assessment or certification procedures	GRI 2-12, GRI 3-3	•	5.1 Group Policies	
•	Resources dedicated to the prevention of environmental risks	GRI 2-12	•	5.1 Group Policies	
•	Application of the precautionary principle	GRI 3-3	•	5.1 Group Policies	
•	Provisions and guarantees for environmental risks	GRI 307-1	•	5.2 Key risks identified	
•	Measures to prevent, reduce or repair carbon emissions that seriously affect the environment, taking into account any form of business-specific pollution, including air, noise and light pollution	GRI 3-3	•	5.3.1 Climate change and other types of pollution	
•	Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste. Actions to combat food waste.	GRI 306-2	•	5.3.2 Circular economy and waste prevention and management	
•	Water consumption and water supply according to local constraints	GRI 303-5 <sup>a</sup>	•	5.3.3 Sustainable use of resources	
•	Consumption of raw materials and measures taken to improve the efficiency of their use	GRI 3-3	•	5.3.3 Sustainable use of resources	
•	Energy: Consumption; Measures taken to improve energy efficiency, Use of renewable energies	GRI 302-1	•	5.3.3 Sustainable use of resources	
•	Greenhouse gas emissions and measures taken to adapt to the consequences of climate change. Reduction targets voluntarily established in the medium and long term to reduce GHG emissions and means implemented for that purpose.	GRI 305-1	•	5.3.1 Climate change and other types of pollution	
•	Measures taken to preserve or restore biodiversity. Impacts caused by activities or operations in protected areas	GRI 3-3	•	5.3.4 Climate change and other types of pollution	
2.	Information on social and personnel issues				
•	Total number and distribution of employees by sex, age, country and job classification	GRI 2-6, GRI 2-7, GRI 405-1b	•	6.3.1 Jobs	
•	Total number and distribution of types of employment contract	GRI 2-7	•	6.3.1 Jobs	
•	Annual average of permanent, temporary and part- time contracts by sex, age and job classification	GRI 2-7	•	6.3.1 Jobs	
•	Number of dismissals by sex, age and job classification	GRI 401-1b	•	6.3.1 Jobs	
•	Average salaries and their evolution broken down by sex, age and job classification or equal value	GRI 405-2	•	6.3.1 Jobs	
•	Pay gap	GRI 405-2	•	6.3.1 Jobs	
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Со	ntents of Law 11/2018 INF	Standard used (GRI)	Se	ction N	otes
•	Pay for equal or similar jobs in the company	GRI 405-2	•	6.3.1 Jobs	
•	The average compensation of directors and managers, including variable compensation, allowances, indemnities, payment to long-term savings provision systems and any other income broken down by sex	GRI 405-2	•	6.3.1 Jobs	
•	Implementation of measures for disconnecting from work	GRI 3-3	•	6.3.1 Jobs	
•	Employees with disabilities	GRI 405-1	•	6.3.1 Jobs	
•	Organisation of working hours	GRI 3-3	•	6.3.2 Organisation of work	
•	Number of hours of absenteeism	GRI 403-9ª	•	6.3.2 Organisation of work	
•	Measures aimed at improving work-life balance and encouraging the mutually responsible exercise of it by both parents.	GRI 401-3	•	6.3.2 Organisation of work	
•	Occupational health and safety conditions	GRI 403-1, GRI 403-3	•	6.3.3 Health and Safety	
•	Workplace accidents and occupational diseases (frequency and severity) broken down by sex	GRI 403-9,GRI 403-10	•	6.3.3 Health and Safety	
•	Organisation of social dialogue, including procedures for informing, consulting and negotiating with staff	GRI 2-29, GRI 403-1	•	6.3.4 Industrial relations	
•	Percentage of employees covered by a collective bargaining agreement by country	GRI 2-30	•	6.3.4 Industrial relations	
•	Evaluation of the collective bargaining agreements in the area of occupational health and safety	GRI 403-1	•	6.3.4 Industrial relations	
•	Policies implemented in the area of training	GRI 3-3, GRI 404-2	•	6.3.5 Training	
•	Total number of training hours by professional category	GRI 404-1	•	6.3.5 Training	
•	Universal accessibility for people with disabilities	00100	•	6.3.6 Accessibility	
•	Equality	GRI 3-3	•	6.3.7 Equality	
3.1	nformation on respect for human rights				
•	Application of human rights due diligence procedures	GRI 3-3	•	7. Information on respect for human rights	
•	Prevention of the risks of human rights violations and, where appropriate, measures to mitigate, manage and remedy possible abuses committed	GRI 3-3	•	7.3.1 Prevention of human rights risks and, where appropriate, measures to mitigate, manage and remedy possible abuses committed	
•	Complaints of human rights violations	GRI 2-26, GRI 3-3, GRI 406-1, GRI 408-1, GRI 409-1	•	7.3.2 Complaints of human rights violations	



Contents of Law 11/2018 INF		Standard used (GRI)		ection	Notes
•	Promotion of and compliance with the provisions of the fundamental ILO conventions regarding respect for freedom of association and the right to collective bargaining	GRI 3-3	•	7.3.3. Promotion of and compliance with the provisions of the fundamental ILO conventions regarding respect for freedom of association and the right to collective bargaining	
4.	nformation on anti-corruption and bribery				
•	Measures adopted to prevent corruption and bribery and against money laundering	· GRI 3-3	•	9.1 Commitment to sustainable development	
•	Contributions to foundations and non-profit organisations		•	9.2 Subcontracting and suppliers	
5.1	nformation on the Company				
•	Impact of the company's business on jobs and local development and on local populations and the region.	001000100000	•	9.1 Commitment	
•	Relationships maintained with local community actors and the types of dialogue with them.	GRI 203-1, GRI 203-2, GRI 2-28, GRI 2-29		to sustainable development	
•	Partnerships or sponsorship				
•	Inclusion in the purchasing policy of social, gender equality and environmental issues and consideration of suppliers and subcontractors' social and environmental responsibility in relations with them	GRI 3-3	•	9.2 Subcontracting and suppliers	
•	Monitoring systems and audits of suppliers and subcontractors and their conclusions	GRI 308-1, GRI 308-2	•	9.2 Subcontracting and suppliers	
•	Measures for the health and safety of consumers	GRI 3-3	•	9.3. Customers	
•	Complaint systems, complaints received and their resolution	GRI 2-26	•	9.3. Customers	
•	Profits earned by country	GRI 207-4b.vi	•	9.4 Tax-related information	
•	Tax on profit paid	GRI 207-1, GRI 207-4b.viii	•	9.4 Tax-related information	
•	Public grants received	GRI 201-4	•	9.4 Tax-related information	





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