

Non-Financial Information Statement (NFIS)

Sustainability report

Financial year 2025

Annex to the Consolidated Management Report of **Haizea Wind Group**

haizea windgroup



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0. Letter from the CEO

Consolidation. This would be the word I would choose to sum up the year 2025. Throughout the year, we have managed to consolidate our industrial growth, we have strengthened our international presence and we have demonstrated that a job well done can transform a company and help it achieve its most ambitious goals. We can affirm that **Haizea Wind Group** is today a benchmark in the European market and one of the most important global players in the manufacture of large wind power components. And we owe this progress to the commitment and effort of all the people who are part of this project.

One of the most significant milestones of 2025 has been the completion of the process of expanding and bringing our XXL monopiles factory in the Port of Bilbao to full capacity. After an investment of more than 250 million euros, this facility has become one of the most advanced plants in Europe in offshore foundations, allowing us to produce the monopiles for the East Anglia 3 and Hornsea 3 wind farms, positioning us as a strategic partner for the main wind power developers on the continent. This expansion not only strengthens our industrial capacity, but also diversifies our customer portfolio, reinforces our future competitiveness and projects the group into a new phase of leadership in the offshore field.

The tour of our plants shows a demanding year, but one full of learning. The situation in the onshore wind sector has remained complex, with our customers - the global OEMs - facing delays in approvals, profitability issues and delays in bringing new models to market. All this has generated particularly notable tensions in the Haizea WEC Group. Despite this, the dedication of our teams, their ability to adapt and operational rigour have enabled us to maintain activity at adequate levels and ensure the sustainability of the business.

Safety is back at the centre of our priorities. Serious accidents during the year remind us of the importance of continuing to build a strong and shared preventive culture. We have strengthened our resources, improved internal systems, developed new reporting tools and expanded training. Safety will remain, without exception, the first condition for any activity in the group.

We would also like to mention that this has also been a year of progress in sustainability, an area that has consolidated Haizea's strategic focus. We have completed the calculation of the carbon footprint in scopes 1, 2 and 3, we consume 100% renewable electricity in all our plants, we are making progress in our Haizea ZERO plan towards climate neutrality and we have reinforced our certifications and recognitions, including improvements in EcoVadis and adherence to the United Nations Global Compact. We have also formalised our commitment to SBTi, which will guide our roadmap towards deep and verifiable decarbonisation.

On the other hand, 2025 has been accompanied by important advances in corporate governance. We have strengthened our internal committees, consolidated a more robust and transparent compliance system, and completed the dual materiality analysis in line with the CSRD. These actions bring the group to a higher standard of governance, in line with international best practices.

In economic terms, the results reflect the success of the collective effort: more than 400 million euros in turnover, an EBITDA of more than 60 million euros and a team of more than 1,500 people. We have grown, we have transformed and we have shown that we are capable of managing complex industrial projects. All this, while meeting the highest standards of sustainability, quality and social responsibility..

In conclusion, for **Haizea Wind Group**, 2025 has been a year of growth, industrial consolidation, progress in sustainability, professionalisation of management and reinforcement of its role in the global energy transition.

Despite the difficulties in the wind market, the group has demonstrated resilience and operational robustness, while driving ambitious environmental policies, high-impact social initiatives and an increasingly robust compliance and governance framework.

Most importantly, thanks to the commitment, effort, attitude and professionalism of all the people who are part of Haizea Wind, we have managed to overcome all the challenges, accompany our customers, and move one step closer to the vision we share: to become one of the leading global manufacturers of large components for the wind industry.

Thank you all, Eskerrik asko guztioi!

Borja Zárraga Suárez
CEO



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1. Introduction

This Non-Financial Information Statement (NFIS) 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 and social issues, as well as those relating to personnel, the company, respect for human rights and the fight against corruption and bribery. The content to be included in the Non-Financial Information Statement has been 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 Law approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Account Audit, on non-financial information and diversity.

This Non-Financial Information Statement, which relates to the year ended 31 December 2025, has been prepared in accordance with the European Commission's non-financial reporting guidelines (2017/C215/01) resulting from Directive 2014/95/EU and, to the extent possible, the Global Reporting Initiative Standards (GRI Standards) have been used, 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)". To identify which of the topics are important and should be reported, we consider a series of variables, including:

- The relevance of such matters or indicators, both internally for the Group and externally for interested parties.
- The sector of activity to which the Group belongs, taking as reference the main non-financial aspects contained in the GRI Standards.

The financial and non-financial data presented in this report is consolidated and refers to the activity conducted by the Group between 1 January and 31 December 2025. The information contained therein referring to fiscal year 2024 is presented for comparative purposes with the information for fiscal year 2025. In this sense, the Group has not been forced to restate any information from previous years.

The companies included in this report are detailed 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.U.
  - Haizea WEC Mecanizados, S.L.U.
  - WEC Business and Technology Center, A.I.E.
  - Haizea WEC Tratamiento Superficial, S.A.
  - Conecta Logistics & Engineering, S.L.
  - Industria Auxiliar Eólica, S.L.U.

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



2. Business model

2. 1. About us

Haizea Wind Group is proactivity and commitment.

We are an industrial group dedicated to the wind energy sector, based in Bilbao, Spain. Specifically, our activity is focused 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 **Haizea Wind Group** understands and to which it responds with its products. The different business units of the Group allow us to provide added-value solutions to our clients.

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



Mission, vision and values

At **Haizea Wind Group** we focus our activity on a clear purpose: to make a decisive contribution to the fight against climate change through the manufacture of large components for the wind industry. This mission guides our decisions, our corporate culture and the way we engage with customers, suppliers, employees and communities.

Our vision is to become the world's most desired and successful manufacturer of large wind components, recognised for the reliability of our solutions, operational excellence and the ability to accompany our customers in the global energy transition.

To realise that vision, we drive a culture based on values that define who we are and how we work:

Excellence through simplicity, gearing processes towards efficiency and quality.

Exemplary behaviour, acting with integrity and responsibility in all our operations.

We care for people, fostering a safe, respectful and talent-oriented environment.

Focus on the customer, anticipating their needs and generating long-lasting relationships based on trust.

These principles are complemented by a Code of Conduct that sets out the ethical and compliance standards that govern day-to-day business: acting fairly and legally, protecting the company's information and assets, separating personal and professional interests, and communicating transparently and responsibly.

Our mission, vision and values are the framework that underpins our growth and our commitment to a responsible, competitive industrial model that



Business lines

In the Group we have three main business activities: wind towers (onshore and offshore), offshore foundations and large castings (onshore and offshore), thus covering an important part of the **total wind supply chain.**



Castings | haizea grupo WEC

2 Facilities | **40,000** tons/year | Since **2005**

Onshore towers | haizea tecnoaranda

1 Facility | **1.500** sections/year | Since **2009**

Offshore towers, TP & foundations | haizea bilbao | haizea breizh

2 Facilities | **193,000** tons/year | Since **2018**





Offshore foundations

At **HWG,** with our factory expansion in Bilbao, we are expanding our industrial know-how to the offshore foundations market, while diversifying in product and client type (wind farm developers, utilities).

In 2022, after signing the contract with Ørsted, a Danish renewable energy multinational, we approved an investment of more than 250 million euros that 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.

In addition, **Haizea Wind Group** secured a EUR 35 million green loan from the EIB (European Investment Bank) in the 2024 financial year. This credit has partially financed the project to extend the Haizea plant in the port of Bilbao, which has enabled us to implement advanced manufacturing technologies, automate and digitalise processes, as well as advance in research and development applied to the manufacture and assembly of large metal structures for wind turbines, such as wind towers, monopile foundations or transition pieces for offshore wind farms.

Wind towers

We satisfy the needs of our clients thanks to our cutting-edge installations for onshore and offshore wind towers.

The highly efficient layout of our factories provides our clients with products of the highest quality and with the shortest delivery times. Their production capacities have been developed to cover the current and future dimensions of both onshore and offshore towers.

In terms of onshore towers, we accompany our clients in strategic markets around the world to provide them with global support while maintaining the highest quality standards.

Large castings

We manufacture large cast components for wind turbines used by onshore and offshore wind farms. We integrate within our capabilities a large part of the operations chain, from the foundry process (casting unit in Agurain, Spain), through the logistics for delivery to the customer (logistics centre in Pamplona, Spain), even including the machining, surface treatment and assembly processes (Itziar-Deba facilities, Spain).

All these capabilities and a committed and specialised team enable us to develop the following products:

- **Turbine hubs.** From 15 Tn to 45 Tn and from 3MW to 8MW, we produce hubs for wind turbines up to 5 meters 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 axes.** From 15 Tn to 44 Tn and from 4MW to 15MW, sand or shell casting.
- **Main Bearing House.** From 14 Tn to 49 Tn and from 4 MW to 15 MW.

Suction sail project in Haizea Tecnoaranda

Haizea Tecnoaranda is part of an industrial alliance with the technologist Bound4blue, in its project to develop suction sails for large ships.

These are rigid sails that lead the renewable transition of maritime transport, taking advantage of the power of the wind.

The International Maritime Organisation has already implemented regulations that obligate 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 alliance with Bound4blue, at Haizea Tecnoaranda we began in 2023 with the manufacturing of the first prototypes of rigid sails, being the first European company to industrialise this process. Haizea Tecnoaranda's role in this process is manufacturing the structure and integrating and assembling the subsystems required for sail operation.

This consolidates the Group's commitment to environmentally sustainable activities, linked to the wind environment.

2. 2. Group constitution



2017 May

Creation of the group.

2018 February

The Joint Venture between **Haizea Wind Group** and SICA Metalúrgica, S.S. results in the opening of a manufacturing plant.

Location: Santa Fe (Argentina)
Product: Onshore towers
Employees: 85
Total investment: €15M

2018 May

A new production centre opened in a strategic location.

Location: Bilbao, Spain
Product: Wind towers
Employees: 275
Total investment: €65 M

2018 December

Haizea Wind Group acquires 80% of Grupo WEC.

Location: Itziar Deba and Agurain, Spain
Product: Hubs, shafts and frames
Employees: 270

2019 November

Haizea Wind Group acquires 92.6% of Tecnoaranda.

Location: Aranda de Duero, Spain
Product: Onshore towers
Employees: 330
Total investment: €74 M



2021 July

Because of our involvement in the Saint Brieuc, Le Tréport and Noirmoutier offshore wind farms, **Haizea Wind Group** establishes a new company in Brittany, France.

Location: Brest, France.
Product:offshore Wind towers.

2023 January

Start of construction of the new offshore foundation plant in the port of Bilbao.

2024 January

Start of production of the first East Anglia 3 XXL monopile project (Scottish Power).

2024 December

In 2024, **Haizea Wind Group** transferred its stake to its partner Sica Metalúrgica.

2025 February

Start of production of the Hornsea 3 project for Orsted.

2025 September

Last shipment of monopiles of the East Anglia Three project for Scottish Power.

2. 3. Key figures and milestones for fiscal year 2025

Key figures

1.500+
professionals

85%
International sales

€416 M+
Turnover

€61 M+
EBITDA

We continue to grow year on year; specifically, in the 2025 financial year, we increased our EBITDA by 31% and our workforce by 7%.

Key milestones

Second quarter

Haizea Wind Group has completed in FY25 the calculation of dual materiality in accordance with the criteria established by the CSRD, including the analysis of risks and its value chain. It is expected that this analysis will be incorporated in future exercises.

June

Haizea Wind Group publishes its active commitment to limit global warming to 1.5ºC by setting emission reduction targets aligned with the criteria of the Science Based Target initiative (SBTi) within 24 months, SBTi ID: 40019394, 26/06/2025.

We set our corporate climate goals with near term and Net Zero targets for 2030 and 2050 respectively.

July

Haizea Wind Group is prepared to develop Environmental Product Declarations (EPD) by product type, and is committed to deliver these documents within six months upon customer request.

October

Haizea Wind Group has been awarded the **Tower Sustainability Award,** a recognition granted by Siemens Gamesa Renewable Energy (SGRE), a leading company in the international wind turbine and wind energy solutions manufacturing sector.

November

HWB: In November 2025, in the framework of the European Week for Waste Reduction, two actions will take place:

1. First annual event "HAZIAK HAIZEAN Small actions, big roots". Aimed at Haizea Bilbao staff, their families and friends, as well as local residents and municipal council staff. A route through the mountains from Zierbena Town Hall to the Punta Lucero Fort, a natural and historical area close to the factory.

   This is a joint action to clean up the forest and footpaths, to keep our environment clean and healthy. The cleaning and care of the existing pond for the conservation of amphibians, supporting local biodiversity. This tour increased our knowledge of the natural and cultural heritage that surrounds us.

2. Collection of mobile devices: in line with the theme set by Europe this year, we developed an action against electronic waste. Promoting the circular economy, 110 devices were recalled, of which 22 were able to return to the market after secure and certified erasure of their data, aligned with ISO 27001 certification. Haizearen indarrarekin ekidin e-zaborra, zikloan jarraitu "With the power of Haizea – reduce e-waste, stay in the cycle" - EWWR

December

HWB: we submitted the Ecovadis questionnaire at the end of 2025 and the result of the evaluation was a gold medal. It should be noted that the most important progress has been made in the area of Sustainable Procurement.



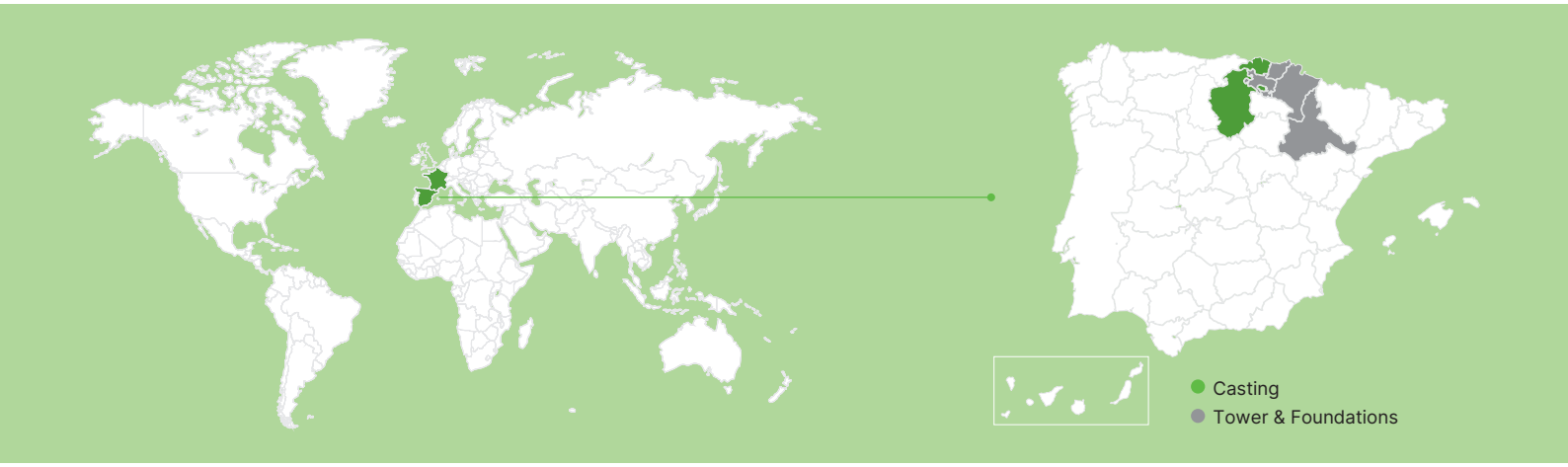
December

HWB: Substitution of fossil fuels for 100% renewable HVO synthetic fuels in Haizea Bilbao's fleet of light vehicles. January 2026 includes replacement in industrial machinery.

The HVO references represent an estimated 90% reduction in the carbon footprint associated with burning these fuels.

HWG: a process that will be extended to the rest of the Haizea Group companies in 2026.

2. 4. Haizea Wind Group around the world



Castings | haizea grupo WEC



Haizea Grupo WEC
Machining and coating
Itziar-Deba (Spain)



Haizea Grupo WEC
Casting
Agurain (Spain)



Conecta
Logistics
Navarre (Spain)

Towers & Foundations | haizea bilbao | haizea tecnoaranda | haizea breizh



Haizea Bilbao
Foundations
Bilbao (Spain)



Haizea Bilbao
Offshore Towers
Bilbao (Spain)



Haizea Tecnoaranda
Onshore Towers
Aranda de Duero (Spain)



Haizea Breizh
Offshore Towers
Brest (France)

3. Identification of key risks and opportunities

The Group's Management carries out a periodic identification of risks and opportunities, divided into different processes: strategy and planning, improvement management, quality management, environmental management, talent management, product engineering, purchasing and logistics management, maintenance, production, information systems, commercial, controlling, financial, health and safety management and project management.

During the financial year 2025, the risk management policy previously approved by the Audit Committee and the Group's Board of Directors has been implemented. This policy establishes, at the organisational level, the persons and bodies responsible for monitoring and following up corporate risks. The corporate risk map, approved by the Board of Directors, has also been implemented and will be reviewed every six months by the Audit Committee and annually by the Board of Directors itself.

In relation to financial risks, the system of internal control over financial information has been designed and implemented during the year 2025.

The Group is also progressing with its cybersecurity master plan, having subcontracted a Chief Information Systems Officer (CISO) during the 2024 and 2025 financial years.

Furthermore, in the Executive Committee's monthly meetings, the achieved operational results and forecasts for the upcoming month are



discussed, along with any other factor that could impact the budgets in the following months. In these meetings, a thorough review of the market situation, competitors, suppliers, clients, and staff is carried out.

We conduct periodic market analyses involving a general review of the key players in the value chain, global business investments, the recent profitability of major OEMs (Original Equipment Manufacturers) in the market, and future market demand expectations by territory. This enables us to be agile in strategic actions and to adapt appropriately to the market.

In addition, we have expanded a national group to a European level, increasing from 3 to 7 manufacturers in the wind energy sector (GRI, Windar, Smulders, EEW Group, Welcon, Seah Wind, and Haizea) to share experiences, incidents, and best practices in environment and safety to prevent risks and enhance sector performance. We also actively engage in collaborative forums with OEMs and developers such as Siemens Energy and Ørsted, participating in key offshore manufacturing initiatives as part of the executive committee.

Of particular note is the participation in the G+ organisation, where partners, manufacturers, and OEMs collaborate to promote transparency and cooperation throughout the value chain. Thanks to these collaborations, we receive information on potential incidents without the need to deal with them directly.

Additionally, we have developed a comprehensive sustainability plan encompassing governance and environmental aspects. In 2025, we have initiated the replacement of fossil fuels with HVO, a synthetic fuel based on vegetable oils that reduces the carbon footprint by 90%. This measure is being implemented in Haizea Bilbao's company vehicles and factories, and will be extended to the rest of the group's companies in 2026.

Along these lines, we conduct a SWOT analysis (Strengths, Weaknesses, Opportunities, and Threats), examining the Group's situation



by analysing both its internal and external characteristics. The main opportunities identified in the market are linked to investment/growth resulting from sector reorganisation. In addition to the Group's SWOT analysis, we have specific matrices for the main businesses, enabling a faster and more tailored response to each company's reality.

Additionally, each of the main companies within the Group has its own 2025-2028 business plan, allowing us to monitor and track the evolution



of key indicators in all businesses, both financial and non-financial, and establish specific actions if necessary.

The most relevant business risks correspond to contractual breaches mainly due to delays in project execution, inadequate contract drafting with potentially damaging clauses, dependence on key clients, difficulty in attracting and retaining specialised talent, dependence on key personnel with no succession plan, competition risks (new entrants, market aggression), and the influence of macroeconomic and geopolitical factors (war conflicts, pandemics, health crises), especially in our sector, requiring us to be very flexible and adapt to market cycles, among others.

The following sections outline the risks identified by **Haizea Wind Group** in environmental, social, personnel-related areas, human rights respect, anti-corruption efforts, and interactions with key stakeholders.


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4. Materiality analysis

The Non-Financial Information Statement allows **Haizea Wind Group** to make available to its stakeholders the data related to the 2025 financial year of those non-financial matters that are of particular relevance to the Group.



The most relevant stakeholders considered are those indicated below:

- Shareholders/Senior Management.
- Employees.
- Clients.
- Subcontractors/suppliers.
- Financial institutions.
- Public administration.

The Group has established specific communication channels with its stakeholders, enabling an understanding of their needs and expectations.

For each stakeholder group, strategic, economic, environmental, social, and management system objectives have been set, monitored, and will be updated in subsequent strategic reflections, starting with an analysis of the Group's internal and external context, focusing on sustainability and Corporate Social Responsibility.

In this sense, in order to define the most relevant issues in terms of sustainability for the current period, Management has conducted an analysis which includes: the pending issues or to be developed from the previous strategic reflection, the expectations of the stakeholders, benchmarking of competitors and regulatory trends, to finally agree on the relevant issues obtained from the joint evaluation. As a result of these analyses, 58 material topics have been identified for evaluation, divided into three categories: Environmental, Governance and Social. The most relevant ones based on internal and external importance are the following:

- Occupational Health & Safety.
- Ethics and compliance.
- Customer satisfaction and relationship of trust with them.
- Attraction and retention of specialised talent.
- Employee well-being (work-life balance, work environment, fair remuneration).
- Product quality and safety
- Climate change.
- Waste/Circular Economy.



The Management has implemented, or is in the process of implementing, measures in this regard in all the aforementioned areas, which are developed throughout this document. Work is also underway on the development of Corporate Policies that regulate the Group's performance in these areas, such as the Environmental and Sustainability Policy and the Corporate Social Responsibility, Ethics and Conduct Policy.

Specifically, numerous compliance milestones were achieved in FY2025, mainly resulting from the appointment of the Compliance Committee and the approval of the new Regulatory Compliance System that guides the Group in the transition to an integrated model. Particularly noteworthy is the performance of the dual materiality analysis in accordance with the CSRD criteria, which includes risk assessment and a comprehensive value chain study.

In addition, a regulatory compliance section has been set up on the corporate website to centralise information, including the Code of Conduct and the whistleblower channel, and an Internal Information System (SII) has been implemented in accordance with legal standards:

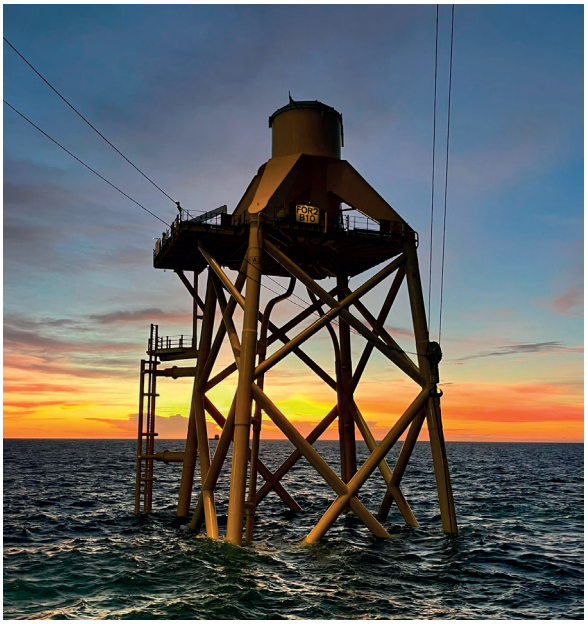
- Centralised management of complaints.
- Full digitisation with traceability.
- Confidentiality and anonymity are guaranteed.
- Outsourcing of management with oversight by the Committee.

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

Furthermore, with the aim of continuing to improve in this area, the **Haizea Wind Group** has drawn up an Action Plan for the coming year, which includes:

- Training in Regulatory Compliance and use of the SII.
- Updating Risk Matrices and Risk Reports.
- Preparation of specific matrices for Haizea Investments and evaluation of other companies.
- Review of Corporate Policies and associated documentation.

In addition, **Haizea Wind Group** presented its adhesion to the **UN Global Compact,** a leading global initiative for the promotion of the Sustainable Development Goals at a corporate level. We have committed ourselves to its ten basic principles for ethical management, which are derived from international declarations on human rights, labour, environment and anti-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, including the following objectives:



- Improving production and resource efficiency and decoupling economic growth from environmental degradation.
- Protecting labour rights and promoting safe and secure workplaces.
- Improving and promoting the social, economic and political inclusion of all people.
- Significantly reduce waste generation through prevention, reduction, recycling and reuse.

Finally, in order to accelerate progress towards the 2030 Agenda, **HWG** is committed to the ***Forward Faster*** initiative, working on:

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

In addition to being a signatory to the Global Compact, in this financial year 2025, they have actively participated in the Global Compact programme: Climate Ambition Accelerator (CAA), being one of the 84 Spanish companies involved. This programme aims to accelerate efforts on climate ambition and decarbonisation. In addition, they participate regularly in the regular activities that take place within this initiative.

In conclusion, the commitment to a culture of compliance, sustainability and social responsibility remains our priority. At **Haizea Wind Group** we will continue to work on improving our processes and implementing new policies that reinforce our contribution to sustainable development.



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5. Information on environmental issues

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, thus combining the achievement of economic benefits with social commitment and respect for the environment.

We have incorporated a number of internal policies and procedures into our operations:

An Integrated Group Policy encompassing general principles of management and action in the areas of Human Rights, Occupational Risk Prevention, Environmental, Energy and Quality Management was approved by the CEO and communicated to employees via the Intranet. The commitment to excellence in environmental management of the Group is the basis for establishing an Environmental Management System whose key commitments are as follows:

- To continuously prevent pollution, minimising and avoiding our environmental impact as far as possible.
- To involve, train and hold 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.

Accordingly, everyone in the organisation must read and accept this Policy and strive to minimise the environmental impact resulting from their activities and the use of the equipment, facilities and work means made available to them.

In fiscal year 2022, Haizea Tecnoaranda approved a new environmental policy updating the responsibilities and competencies in this area and increasing its environmental commitment, which has been in force throughout 2025. This company implemented a new energy review procedure in 2023 that describes the methodology established 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.

General Code of Ethics and Conduct of the Group, which indicates that the Group will promote protection and respect for the environment, will integrate this objective in the development of its activity and will promote the development of good environmental practices, including responsible resource consumption, proper waste management and reduction of waste generation.

In this sense, and 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 formalised contractual relationships, we have a Code of Conduct for suppliers that is included in the



General Purchasing Conditions which all suppliers and contractors must sign.

Instruction on good environmental practices and awareness guidelines, which seeks to raise awareness among all staff about the problem of waste and encourage the reduction, reuse and recycling of waste and packaging, as well as take actions to reduce energy consumption. Specifically, good practices are established in the management of the following elements: water, paper, batteries and ink cartridges, atmospheric emissions, energy consumption, hazardous materials, purchases, inert waste, computer equipment, transportation and metal work.

Procedure for identifying and assessing environmental aspects, in all the Group's plants and with special relevance in the foundry activity of Haizea Grupo WEC, which is the Group company with the greatest potential environmental impact associated with the activity conducted (foundry).

5.2. Certifications

International Organization for Standardization (ISO) 14001:2015

All our plants have Environmental Management Systems certified according to ISO 14001, an internationally recognised standard. This certification specifies the requirements for an environmental management system so that organisations control their environmental aspects and impacts and thus improve their performance and results. By obtaining this certificate, which is completely voluntary, the Group has demonstrated its proactivity in exceeding legal requirements and achieving levels of excellence in environmental matters.



International Organization for Standardization (ISO) 50001:2018

As an energy-intensive company, **HWG** aims to achieve ISO 50001 certification at each of its plants. The purpose of this standard is to help organisations use energy more efficiently, reduce costs, improve energy performance and reduce environmental impact.

Haizea Grupo WEC's foundry unit obtained this certification in 2022 (valid until 2028) and Haizea Tecnoaranda in 2023 (valid until 2026). On the other hand, Haizea Bilbao has energy audits and has begun to implement the standard in 2025, with the aim of obtaining certification in 2026.

Ecovadis

Furthermore, all the group's companies have improved their EcoVadis Global Score with respect to 2024, with Haizea Bilbao, Haizea Tecnoaranda and Haizea Grupo WEC achieving 80, 74 and 67 points out of 100, which has earned us the gold, silver and bronze medals awarded by EcoVadis, respectively.

Carbon Disclosure Project (CDP)

CDP is an international non-profit organisation that operates one of the world's leading global environmental disclosure systems.

Its mission is to help companies, cities, states and regions measure, manage and report their environmental impacts, especially on climate change, water and deforestation.

It should be noted that since the 2024 financial year, Haizea Bilbao has submitted its evaluation through CDP. In this way we report on our environmental performance and the environmental impact attributable to our organisation is assessed. In 2025, the grade obtained, both in the Climate Change and Water Security sections, was C.

Ministry for Ecological Transition and the Demographic Challenge (MITECO)

Several of our plants have calculated, verified and registered their organisational carbon footprints with MITECO, obtaining the seal of approval.

5.3. 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 conducting the necessary improvement actions to reduce environmental impact. Specifically, in the Group there are 5 people dedicated full time to the prevention of environmental risks, of which two people are part of Haizea Bilbao, one of WEC and two of Tecnoaranda.

Since fiscal year 2022, the continuous improvement area of Haizea Grupo WEC has been working with the objective of standardising faster, more flexible processes, reducing the time from order to delivery (Lead Time) and eliminating processes that do not add value, which also means a reduction in environmental impact.

Regarding the expenses borne by the Group in relation to the reduction of environmental impact and the protection and improvement of the environment, these are mainly associated with the management and removal of waste, as well as certain investments. During the financial year 2025, various environmental investments amounting to 1,170 thousand euros (592 thousand euros in the financial year 2024) have been made.

Aware of the large volume of staff who have to travel to our work centres, we have prioritised progress in the area of Sustainable Mobility.

HWB carried out a new mobility diagnosis among its employees, finding that 63% of our employees regularly travel by private vehicle without sharing it, most of them being vehicles with combustion engines. Only 23% are reluctant to share a car with another employee.

As a result, the first Transport to Work Plan was approved in June 2025, with the main lines of action:

1. Use of electric vehicles for internal transport: already partially implemented.

2. Encouraging carpooling through incentives.

3. Improve company bus routes: a third route has been added in 2025 to extend the service to workers. On average we recorded 235 trips per day on weekdays.

HWG has a multidisciplinary team to carry out a new Sustainable Mobility Diagnosis, from which a Mobility Plan will emerge with objectives and actions to improve the accessibility of our employees to the workplace, while minimising



negative environmental impacts by reducing emissions of greenhouse gases and associated particulate pollutants.

In addition, a survey was carried out at the Bilbao centre in 2025 with the aim of finding out the habits and needs of the workers, as well as identifying possible areas for improvement.

In order to encourage participation and to obtain a representative sample, collaboration was encouraged by drawing Amazon gift cards among all employees who completed the survey.

5. 4. Key risks identified

We are committed to the environment, and awareness in this area has led us to develop policies and implement measures that minimise the risk and environmental impact that we may generate as a result of our activity. We have reflected on the potential impacts related to our activity on the environment and have detected the following key risks:

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

To mitigate these risks, we have defined key indicators that are constantly monitored by Group Management.

As at 31 December 2025 it is not recorded in the consolidated balance sheet, as no provision is required for risks and expenses arising from environmental actions, nor are there ongoing litigation, compensation 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.

Finally, each company in the Group has liability insurance to cover damage, and that Haizea Bilbao has Construction All Risk (CAR) Insurance for the entire extension construction.

HWB has carried out an environmental risk analysis in accordance with RD 2090/2008, which approves the regulations for the partial development of Law 26/2007, of 23 October, on Environmental Responsibility, as well as the UNE 150008:2008 standard on environmental risk analysis and assessment.

Given that the primary repair amount is less than €2,000,000 and that we have ISO 14001 certification, the Haizea Bilbao SL installations are exempt from the obligation to subscribe to a financial guarantee.



5. 5. Environmental management and performance

5.5.1. Climate change and carbon footprint

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

- **Year 2025-2027:** 2% annual reduction in energy consumed per tn/ billed (base year 2024). Fulfilled by 2025.
- **Year 2027-2030:** 95% of the energy consumed must be of renewable origin.
- **Year 2030:** 50% reduction of global emissions.
- **Year 2040:** Being Carbon Neutral.
- **Year 2050:** Achieving Net Zero according to SBTi.

By 2025, the planned actions have been achieved, including the use of 100% of electricity from renewable sources, the complete calculation of the carbon footprint covering scopes 1, 2 and 3 according to the GHG protocol, as well as the development of the Decarbonisation Plan.

In order to achieve the above-mentioned objectives, the project is divided into four phases:

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 more precise information on the means of transport used in each category (according to GHG conversion factors - UK) for the shipment of their products to Haizea. These data shall include direct and indirect emissions (Scopes 1, 2 and 3) related to the production of materials and services supplied to Haizea Wind Group companies. Furthermore, all our suppliers shall calculate their footprint under an international standard - ISO 14064 or GHG Protocol Corporate Accounting and Reporting Standard - in order to ensure consistency and comparability of the information shared.
2. **Analysis of possible applicable scientific methodologies and definition of emission reduction targets.** Once the data has been collected and the most appropriate scientific methodologies have been selected, a roadmap for achieving emission reduction targets will be determined, allowing us to minimise the carbon footprint generated by our supply chain. These objectives will be based on an analysis of collected data and industry best practices.
3. **Support and collaboration:** where required, **Haizea Wind Group** will provide information and technical support to our suppliers to help them identify emission reduction opportunities and implement more sustainable practices in their operations.
4. **Monitoring and reporting:** Haizea will continuously monitor progress in achieving the emission reduction targets set.

At **HWG**, following the calculation of the Carbon Footprint, actions have been established associated with:

- Reduction of gas consumption, through new piping to avoid leaks and the use of induction heating.
- Outdoor lighting project, minimising the use of generators.
- New solvent recovery facility.
- Environmental Management in the Supply Chain.
- Reduction of waste to landfill ratio.

In line with our strategy and objectives to fight climate change, and as a necessary step to reduce CO2 emissions, we calculate and monitor GHG emissions (greenhouse gases): emissions are quantified in companies which have a significant impact due to their activity. This helps us set specific objectives and promote the decarbonisation of the economy.



In addition, the Group is working to quantify scope 3 emissions. This calculation began in Haizea Bilbao in 2022, while in Haizea Tecnoaranda it was carried out in 2023 and 2024, and will be in progress during 2025. As a first step, a project started in 2023 at Haizea Grupo WEC to calculate the organisation's carbon footprint, in reference to scopes 1, 2 and 3. The objective of this project, promoted by the Association of Founders of the Basque Country and Navarra, is the coordinated application of the methodology for calculating the European Environmental Footprint to Basque SMEs in the foundry sector, through a tool specifically developed for this purpose.

The company has been registered since 2022 in Miteco, a registry that includes the efforts of Spanish companies, administrations and other organisations in the calculation, reduction and compensation of the greenhouse gas emissions generated by their activity, more specifically for the scope 1 and 2 emissions. In 2023 we began the process for measuring scope 3 emissions, including emissions generated by waste management, water consumption and travel of the majority of the workforce.

To this end, we ask all our suppliers to provide us, as soon as possible, with information on their greenhouse gas (GHG) emissions, as well as greater precision in the means of transport used in each category (in accordance with the GHG Conversion Factors - UK) for shipments made to Haizea.

The data shall include direct and indirect emissions (Scopes 1, 2 and 3) associated with the production of materials and services supplied to Group companies.

To measure the progress of our actions against climate change and the reduction of GHG emissions, we have set a series of objectives at the corporate level, therefore applicable to all our work centres, consisting of the gradual reduction of:

- Waste generation per ton of final product.
- Energy consumption per ton of final product.
- CO2 equivalent emissions per ton of final product.

This is in order to achieve the shared objective of being neutral in carbon emissions by 2040 at group level.

The historical series of emissions data resulting from the Organisational Carbon Footprint calculation is as follows:

Scope 1	2024	2025
Haizea Bilbao	1,595	3,115
Haizea Tecnoaranda	567	374
Haizea Grupo WEC	2,597	2,368
TOTAL	**4,759**	**5,891**

Scope 2	2024	2025
Haizea Bilbao	-	-
Haizea Tecnoaranda	-	-
Haizea Grupo WEC	-	-
TOTAL	**-**	**-**





Below is a description of the emissions relative to production variables. In the 2025 financial year, we have increased the number of tons melted in the WEC Group and the number of tons produced in Haizea Bilbao. However, we have decreased the number of sections manufactured in Haizea TecnoAranda.

Haizea Tecnoaranda

Indicator	2021	2022	2023	2024	2025
Carbon emission tn (scope 1 and 2) / section	0.62	0.44	0.54	0.37	0.35

As a result of the commitment to the environment, there will be a significant reduction in the ratio of emissions in tons of carbon (scope 1 and 2) per section produced in 2024 and 2025.

2025 is the third consecutive year in which 100% of the electrical energy consumed comes from renewable sources.

The company has been registered since 2022 in Miteco, a registry that includes the efforts of Spanish companies, administrations and other organisations in the calculation, reduction and compensation of the greenhouse gas emissions generated by their activity, more specifically for the scope 1 and 2 emissions. In 2023 we began the process for measuring scope 3 emissions, including emissions generated by waste management, water consumption and travel of the majority of the workforce.

In addition, Haizea TecnoAranda has been verifying its carbon footprint at the Applus control body since they began calculating this measurement in 2018 and subsequently registering them in Miteco. In 2018, 2019 and 2020, the calculation seals and the calculation +reduzco seals were achieved for 2021, 2022 and 2023..



Haizea Bilbao

In Haizea Bilbao, to achieve the set objectives, the agreement with Acciona was renewed for the supply of 100% renewable energy from 2022. In fiscal year 2025, emissions are

0.022 tn CO2 eq/tn final product (0.026 in 2024), all of them associated with scope 1.

It should be noted that although emissions in absolute values have increased due to increased production, we continue to focus on decarbonisation actions carried out in 2025 and earlier years.

Haizea Grupo WEC

At Haizea Grupo WEC, 100% of the electrical energy consumed throughout the different production processes comes from 100% renewable sources. In 2025, the ratio of tons of CO2 equivalent per ton of metal produced was 0.082 (0.044 in 2024), all of which were associated with scope 1.

It should be noted that this electricity consumption is linked to the bond that WEC holds with Acciona under a PPA (Power Purchase Agreement).

The Group is not subject to or affected by the regulations on emission rights issued by the European directive and considered in the national emissions plan, which is why it is not in a position to provide information on greenhouse gas emission rights.

5.5.2. Circular economy and waste prevention and management

HWG is firmly committed to implementing an environmental strategy based on the circular economy, with the aim of minimising the possible negative impacts resulting from our activity and with the firm purpose of achieving effective management of the waste generated. Being aware of this, in fiscal year 2025 the Group has continued to improve the various recycling and reuse procedures that promote eliminating and reducing waste, highlighting the following initiatives:

- Signage has continued at the plants, improving the identification and zoning of waste containers.
- Reduction of the carbon footprint due to the compaction of plastics and consequently, the reduction of transportation.

Below is a list of the most relevant initiatives conducted in each plant in terms of circular economy and waste management:



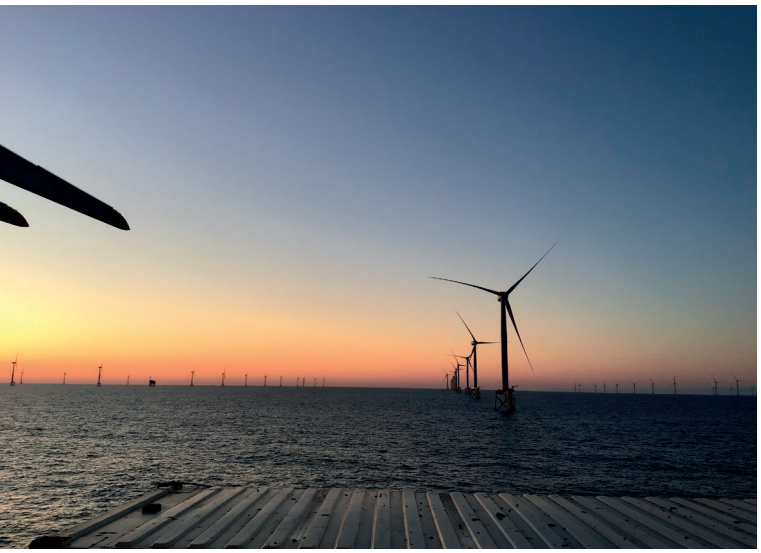
Haizea Tecnoaranda

- Work continues on the circularity of waste, increasing efforts to reuse pallets, wooden cartons, scrap metal, cardboard and plastics in good condition, zinc dust, etc.
- In 2025, 199 tons of wood packaging and 25,000 liters of cleaning solvents were reused.
- Improved waste management through the recycling of PPE, thanks to the collection by the supplier of used boots for conversion into secondary materials that are reintroduced into the production chain. In addition, wherever technically possible, forklift trucks and platforms have been replaced by switching from combustion engines to electric equipment, thus reinforcing the company's commitment to reducing emissions and improving energy efficiency.
- Efforts to reduce the carbon footprint of waste collection, thanks to compactors for urban waste, paper and cardboard and plastics, having reduced the number of collection trips since 2024 by 86%.

Haizea Grupo WEC

- At Haizea Grupo WEC, we hold biannual meetings to monitor environmental aspects, which we call "MA Forum". These meetings mainly deal with the following aspects:
  - Monitoring of environmental indicators.
  - Incidents detected.
  - Actions carried out and planned.
- Waste management is being continuously improved through the separation of pallets, reusing or revaluing pallets in good condition, resulting in very positive outcomes in 2025 which have led to the reuse of 22 tons of wood.
- At the foundry, which is the main waste generator, actions are conducted with the aim of improving the ratio of “Sand waste managed/Tons produced”, highlighting the following:
  - Separation of the metallic part from sand waste.
  - Recovery of ceramic waste.
  - Development of the installation project for a mini screening plant whose start-up is expected in the first quarter of 2024. Through this installation, an internal pretreatment of the sand waste will be carried out to obtain different fractions of said waste through screening and treatment. Differentiated fractions will be obtained, some destined for landfill and others that can be reused in the sand circuit.

- At the end of 2022, three waste compactors for cardboard, plastic and Big Box containers were put into operation at the foundry, which transforms this waste into bales of cardboard and plastic. This initiative results in the reduction of CO2 emissions as it considerably reduces the number of trips related to waste management, with only 2 trips in both 2024 and 2025.
- Similarly, another compactor was installed in the surface treatment unit, which has allowed the number of trips to be reduced in the last 2 years.
- In the last quarter of 2024 we began a project to recover fine melting waste. These hazardous waste items, which were previously destined for landfill, will now be sent to a company that will use them as raw materials in its production process.



Haizea Bilbao

- Good environmental practice on the use of aggregates: the Logistics department has developed a framework on the material used for the stockpiling of monopiles. We use materials supplied from nearby quarries (Mañaria) and from our own earthworks due to the extension works. In addition, the pattern of reuse and transformation over the years has been defined, including it as a CAPEX stockpile for the plant.
- Improvements in the identification, segregation and management of waste: the identification labels for all waste (hazardous and non-hazardous) have been renewed, intermediate collection points have been created in workshop areas, and removal flows have been optimised. Training for managers on waste management has begun. It is expected to consolidate an improvement by decreasing the Hazardous Waste "Contaminated Material".
- Shot management: in the last quarter of 2025 we started cleaning and recovering our own shot, avoiding the purchase of virgin material. In addition, the service provider is local, reducing the potential impact of associated transport.
- Inclusion of new eco-designed chemical products, reducing the environmental impact due to the emission of volatile organic compounds, minimisation of possible risks due to exposure to our workers, and reduction of waste by purchasing larger formats or without the need for transfer.

In addition, for waste management, Group companies have contracts with management companies that specialise in waste transportation and handling. The entire process, from collection to handling and, in some cases, return for reuse, as well as the responsibility of both, is included in these contracts.

The waste generation for the years 2023, 2024, and 2025 is detailed below, both by type of waste and by destination:

Type of Waste (in tons)	2024	2025
Hazardous waste	1,137	2,361
Non-hazardous waste	14,519	19,361

Type of Waste (tons)	2024	2025
Hazardous waste	1,137	2,361
Recovery destination	208	335
Disposal destination	691	1,836
Recovery destination	238	190
Non-hazardous waste*	14,519	19,361
Recovery destination	6,457	10,654
Disposal destination	3,188	3,854
Recovery destination	4,874	4,853

* In financial year 2023 we began a more in-depth analysis of the waste considered non-hazardous in Haizea Bilbao, leading to the monitoring of waste that is returned and that can be recovered, such as scrap metal, shavings, the frames/ferrules and slag.

Hazardous waste is considered to be waste whose intrinsic properties present risks to health or the environment, such as, for example, melting refineries, absorbents, paint, sludge, etc.

The non-hazardous waste generated in fiscal year 2025 mainly includes the following materials: shot grit, scrap metal, slag, shavings, zinc dust, flux, paper and cardboard, plastics and wood.



The Group has key waste generation monitoring indicators that help set specific actions and specific objectives, as well as monitor whether the measures implemented are having an effect. Below we detail the indicators for each of the Group companies.

Key indicators

Haizea Bilbao

Indicator	2024	2025
Kilograms of hazardous waste per ton produced	6.50	13.52
Kilograms of non-hazardous waste per ton produced	65.89	80.71

In fiscal year 2025, the kilograms of waste per ton produced remain similar to those of the previous year. The start-up and implementation of new projects (with an impact on welding and surface treatment) have caused the ratios to increase temporarily. In the last months of 2025, the ratio has improved.

Haizea Tecnoaranda

Indicator	2024	2025
Kilograms of hazardous waste per section	176	215
Kilograms of non-hazardous waste per section	58	353
Urban waste per employee kg/person	5	43
Ratio: Recycled waste/generated waste	81%	82%

Tecnoaranda works continuously to optimise the management of waste, prioritising its minimisation, reuse and recovery, with the aim of prolonging its useful life and reducing its environmental impact. The increase in ratios is justified in this case by the reclassification of some wastes in terms of their hazardousness, and by the reclassification as waste of some materials considered until 2024 as by-products.

Haizea Grupo WEC

Indicator	2024	2025
Sand waste/tons cast	2.43%	1.35%

As we already mentioned in the actions conducted, one of the main projects that we have conducted in the Group in terms of circular economy at the Haizea Grupo WEC foundry is to improve waste management. This has been directly reflected through the monitoring and supervision of the sand waste indicator per ton melted. The decrease in the percentage is due to the installation of the sand screen that we carried out during the 2023 financial year. During this adjustment process, which lasted until June 2024, continuous improvements were made. From that month onwards, the screening began to operate at 100%, and the positive results were immediate.

5.5.3. Sustainable use of resources

We work to optimise the use of material resources in all phases of our activity. For this reason, in the Group we continue to promote the efficient use of resources focused on the consumption of raw materials and energy. Through 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 thus optimise resource consumption in our operational processes.

The main measures implemented in fiscal year 2025 linked to the sustainable use of resources are the following:

- The clear search for renewable energy consumption guides the Group's strategy in this matter. Thus, in 2022, a renewable energy supply agreement (PPA) was signed until 2031 covering the consumption of the Haizea Grupo WEC and Haizea Bilbao factories (tower production). This agreement has been complemented with another that came into force in 2024, with a five-year term covering the consumption of Haizea Tecnoaranda and Haizea Bilbao (production of foundations), allowing the electricity consumed to be 100% renewable.
- Installation of solar panels for energy self-consumption at Haizea Tecnoaranda, completed in November 2023, which has reduced CO2 emissions by more than
- 1.3M kg.
- At Haizea Tecnoaranda the following initiatives have been implemented with the aim of reducing natural gas consumption:
  - Incorporation of LED lights as part of the renovation of car park luminaires.
  - Incorporation of a refrigeration plant to take advantage of the surplus energy of the photovoltaic system, increasing the temperature of the stored water from 75ºC to 90ºC, which means better performance in the painting booth heating system, in addition to taking advantage of the cold for the air conditioning of offices and locker rooms.
  - Installation of SCADA system (industrial automation tool) to monitor compressors, the photovoltaic installation and other energy consumption meters.
  - Installation of a 250kw variable air compressor with ultra-efficient IE5 motor, replacing the previous compressor.
  - Review of the roof panels by means of a thermographic camera, in order to detect possible anomalies or loss of performance. As a result of this inspection, the defective panels were identified and replaced. In addition, 44 panels that were affected by the proximity of chimneys were relocated to areas with better operating conditions.
  - Linking compressed air consumption in shot blasting and metallising machines to the extraction on/off system, avoiding unnecessary consumption when the equipment is not in operation and thus improving operational efficiency.
  - Analysis of the motors with the highest energy consumption in the plant, with the aim of planning their progressive replacement with more energy-efficient motors, reducing electricity consumption and associated emissions.





Lean manufacturing in 100% of HWG plants

All the Group's plants operate under the *'lean manufacturing'* methodology, with the aim of making processes more efficient and improving product quality through the incorporation of operational improvements such as:

- Daily meetings at the plant level. Creation of action tables to monitor continuous improvement initiatives:
  - Maintenance requests.
  - Safety training.
  - Small improvements in the logistics and production process.
  - Visual and efficient plant management.
  - Introduction of new roles within the teams focused on safety, quality and delivery.
- Visits to the Management plant on a monthly basis.

During 2025 the Lean Manufacturing team at Haizea Bilbao stands out for carrying out:

1. Implementation of 5s in some areas, reducing the duplication of tools and elements, more open spaces.
2. Analysis of process improvement points and follow-up of productivity and safety improvement actions in weekly meetings.
3. Standardisation of processes, definition of tasks per job and creation of detailed operational standards including best practices in terms of safety, quality and productivity.
4. Development of a system to control training needs per person/job.

Circularisation of materials after project closure

At Haizea Bilbao we have a process of collecting, classifying and inventorying leftover materials and tools after the completion of projects. We collect mainly screws, bolts, nuts, washers and clamps. All these elements are accessible to Project Managers within the warehouse, in a product shop at zero cost. Since 2023, ferrules and rings have also been collected and sold as scrap.

Welding Tool Control

With the aim of reducing the consumption of abrasive discs at the Haizea Bilbao plant and raising awareness among the team about responsible use, we have vending machines for the issuance of tools, as well as an identification system via employee card to improve tracking. This project has led to a significant reduction in disk consumption year after year.

5.5.3.1. Raw Materials

Consumption of main raw materials used in the Group in 2024 and 2025 is shown below. The reason for the evolution in absolute terms lies in the increase in sales volume and associated orders:

Consumption of Raw Materials

Consumption of Raw Materials	Units	2024	2025
Paint	Litres	938,536	1,022,881
Flux	Tons	913	1,962
Sheet	Tons	92,139	192,798
Ingot	Tons	15,318	12,403
Scrap	Tons	7,563	6,843
Sand	Tons	1,793	1,290
Resin	Tons	834	765
Catalyst	Tons	247	456

Overall, the total consumption of raw materials in 2025 has increased by approximately 10% compared to the previous year, as a direct consequence of the higher level of production at the group's various plants. This increase is mainly due to the increase in industrial activity and the higher manufacturing volume during the year.

5.3.3.2. Energy and water

Energy consumption

Energy consumption (kWh)	2024	2025
Electricity (kWh)	50,532,217	41,948,156
Natural Gas (kWh)	8,264,187	9,258,689
Diesel (litres)	173,351	257,903

In this regard, the Haizea Grupo WEC foundry unit has focused in 2025 on improving the management and use of energy, through a more exhaustive monitoring of the use of furnaces, in order to minimise downtime and heating times that are not taken advantage of. This has resulted in more efficient energy consumption. In addition, it is worth noting that, as established by regulations, all our plants are subjected to energy efficiency audits every four years. From these regulations, certain improvement actions emerge that we are implementing gradually, helping us make sustainable use of resources. It is noteworthy that all electricity consumption comes from 100% renewable energy.

Haizea Bilbao has increased its electricity consumption in absolute terms, due to the expansion of the monopiles business and other industrial activities in the 2025 financial year. The improvement in energy efficiency is very noteworthy, as is the energy consumption indicator in TEP (Ton of Oil Equivalent) compared to the tons produced:

	TEP/Tn produced
2023	0.0235
2024	0.0151
2025	0.0111

The Haizea Group, as a group considered a Large Energy Consumer according to the Energy Sustainability Law (Law 4/2019), has an energy management system that helps us to monitor consumption in real time, and is capable of generating alerts to avoid inefficiencies. During the year 2025, the network of analysers available for data capture has been extended, a project that will continue in 2026 to cover 100% of energy consumption.



Water consumption

Next, the historical water consumption information is presented:

Water Consumption (m^3)	2024	2025
Foundry (Haizea Grupo WEC)	7,436	3,769
Tecnoaranda	468	400
HWB	4,682	19,210

In relation to water consumption, there has been a general decrease in all Haizea plants, as a result of the implementation of environmental measures aimed at reducing water consumption and optimising production processes.

Protection of biodiversity

The activities and operations conducted in the production plants do not have a direct influence on biodiversity and protected areas, since the plant facilities are located within industrial estates authorised for this purpose, and therefore are not part of areas considered as protection areas. In addition, we comply with all the environmental regulations required.

The Port Authority of Bilbao has several environmental monitoring instruments and systems to control and communicate the state of the environment associated with its port activities. These systems are formally published in the online "environmental dashboard". In addition, there is an Environmental Surveillance Plan that includes the monitoring of water quality parameters (physicochemical) and biological surveillance of the marine environment (benthos and phytoplankton).

According to EIDOS, the state database that gathers all official information on protected, endangered and invasive alien species and wild flora and fauna in Spain. The species affected in the Port of Bilbao in zone I-Z14812100 with official environmental relevance are:

Scientific name	Common name
Hippocampus hippocampus	Short-snouted seahorse
Uria aalge	common murre
Sterna hirundo	Common Tern
Stercorarius parasiticus	parasitic jaeger
Rissa tridactyla	black-legged kittiwake
Puffinus mauretanicus	Balearic Shearwater
Morus bassanus	Northern gannet
Larus marinus	great black-backed gull
Larus canus	Common gull
Hydrobates leucorhoa	Leach's storm petrel
Gulosus aristotelis	Common Shag
Gavia stellata	red-throated diver
Gavia immer	Common Loon
Calonectris diomedea	Cory's shearwater
Calidris maritima	Purple sandpiper
Alca torda	Razorbill

Although it is not a protected area and is also a highly anthropized environment, there is a frequent presence of protected seabirds, many of which are pelagic and classified as sensitive. These birds use the area as a feeding or resting area.

Haizea Bilbao has two wastewater treatment plants to prevent discharges into the sea outside the legally permitted parameters. Throughout the year 2025, the works necessary for the future connection of our discharges to the Bilbao Bizkaia Water Consortium network have been carried out, eliminating discharges into the natural environment. The connection is planned for the first half of 2026.

In relation to the product, our objective is to manufacture it based on the client's specifications and design. Our client is committed to assuming a leadership position in the biodiversity conservation and protection sector and to raising awareness among all stakeholders about the magnitude of this challenge and the benefits associated with addressing its solution.

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

In compliance with the Environmental Responsibility Act, Haizea Bilbao carried out an environmental risk analysis in July 2025 to assess the possible economic impact of environmental damage. As a result, they determined that the estimated potential environmental damage is less than 2 million euros and that they are adhering to an environmental management system certified under ISO 14001. By not exceeding this threshold and complying with the certification, it is not necessary to provide the mandatory financial guarantee established in article 26/2007 of the Environmental Responsibility Act.


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6. Social and employee-related matters

6. 1. Group policies

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

Although Haizea already had some Corporate Policies and Procedures, we have decided to launch in 2024 (and finalise in 2025) a process of compiling corporate Policies and Directives, homogenising, standardising and adapting them to the current realities of the Group.

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

Group 1:

- Security 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.

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

Legal Compliance and Information Security Policy: We comply with all applicable laws and regulations, operating with integrity and transparency. Security in the processing of Information (of the business, our customers, our employees and in general of all interested parties) is critical and we are committed to managing it appropriately.

Corporate Governance and Corporate Communication Policy: We maintain clear and effective communication, both inside and outside the organisation. We are a group with different production centres, and we want to be part of the reality of our environment, participating in cultural, sports and social action activities in our areas of influence. Include antitrust.

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

Quality Policy: Our commitment to quality is clear. Every component we manufacture must meet the highest market standards, ensuring the trust and



loyalty of our customers, allowing us to be a valued and sustainable group in our field.

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

Purchasing Policy: Our procurement processes are rigorous, geared towards 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 inside and outside our facilities.

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

Research and Development Expenditure: Innovation must be the engine of our growth. We are a leading manufacturer 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 guaranteeing the success and the quality standards that characterise the Group: **we will go as far as our people go.** For all these reasons, Management has identified the main risks related to personnel

- Not being able to attract talent and/or retain it.
- Deficiencies in the field of health and safety at work.
- Insufficient measures to enable a satisfactory work/life balance.

The consequences associated with the materialisation of such risks could be the reduction of employee productivity and the deterioration of their motivation.

To mitigate these risks, we have defined key indicators that are constantly monitored by Group Management.



6.3. Management and social performance

6.3.1. Employment

With the aim of having sufficient talent to confidently address the challenges we face in the Group, we have worked mainly in two areas: **talent attraction and talent management.**

During the 2024 financial year, Haizea Bilbao was immersed in an intense talent recruitment process linked to the start-up of the new production plant, which culminated in the hiring of more than 500 employees.

This process has been developed in line with the principles of the **UN Global Compact,** in particular with the objective of improving and promoting the social, economic and political inclusion of all people. Within this framework, the company has strengthened and set up various collaborations with programmes for training and job placement for people at risk of social exclusion, including the GazteOn programme and the Soldarte School.

As a result of our commitment to our people, the Group's staff has increased by 7% in the 2025 fiscal year.

Haizea Bilbao has also consolidated collaborations with FVEM, the Biscayan Federation of Metal Companies, participating in the Industria Erronka initiative, and collaboration with universities and vocational training centres, with the aim of strengthening the recruitment of qualified talent and favouring the incorporation of technical and professional profiles aligned with the needs of the organisation.

In line with the modernisation of people management processes, an Application Tracking System (ATS) was implemented during the year, together with the new Haizea Bilbao employment website, as digital tools for the management of selection processes. These initiatives have had a direct impact on process traceability, increased management capacity and improved candidate experience.

In order to facilitate the integration and adaptation of new recruits, the company has implemented a new welcome process called Welcome Package, aimed at improving the onboarding experience and speeding up adaptation to the organisation, the teams and the jobs.

The breakdown of the number of **Haizea Wind Group** employees at the end of the 2025 financial year, distributed by gender, age, professional category, type of contract and type of working day, is as follows:

Total number of employees by gender	31/12/2024	31/12/2025
Men	1,300	1,388
Women	114	133
Total	**1,414**	**1,521**

Total number of employees by age	31/12/2024	31/12/2025
Under 30	245	245
Between 30 and 50	898	799
Over 50	271	477
Total	**1,414**	**1,521**

Total number of employees by professional category	31/12/2024	31/12/2025
Managers	34	33
Technical staff and middle management	231	287
Administrative staff	19	21
Workers	1,130	1,180
Total	**1,414**	**1,521**

Total number of employees by contract type	31/12/2024	31/12/2025
Permanent	1,252	1,386
Temporary	162	135
Total	**1,414**	**1,521**

Total number of employees by type of work day	31/12/2024	31/12/2025
Full-time	1,410	1,504
Part-time	4	17
Total	**1,414**	**1,521**



At **Haizea Wind Group** we are committed to permanent hiring to provide greater stability to the human team that works with us and with the aim of retaining our talent. At the end of fiscal year 2025, 91% of our employees had permanent contracts (89% in 2024). The increase of this benchmark is in line with **HWG**'s objective of not only focusing on training employees on an ad hoc basis, but also on creating a closer and more lasting relationship over time. Proof of this is that 99% of our staff have full-time contracts (99% in 2024).

At Haizea Bilbao we actively promote measures aimed at favouring the reconciliation of the personal, family and working lives of our staff. Within this framework, we prioritise the implementation of working time adjustments whenever the nature of the job and the organisation of the work allow it.

Our activities are focused mainly on productive plants, where women traditionally had less presence. Hence, 91% of employees are men (92% in 2024). However, we are working to attract and incorporate more women into our activities.

Responding to the objective of increasing the presence of women in management positions, in 2025 we will reach a proportion of 18% of women in the total composition of the Management Committees of each of our plants.

Annual average contracts

The experience and knowledge of the people who are part of **Haizea Wind Group** are one of the main points that have facilitated our competitive position, this approach being consistent with the type of majority contract that we formalise with our staff, as can be seen from the following breakdowns of information with the annual average of permanent and temporary contracts.

	2024		2025	
Average number of employees by gender	Permanent	Temporary	Permanent	Temporary
Men	1,136	80	1,277	74
Women	102	10	118	4
Total	**1.238**	**90**	**1,395**	**78**

	2024		2025	
Average number of employees by age	Permanent	Temporary	Permanent	Temporary
Under 30	194	27	195	25
Between 30 and 50	796	52	855	33
Over 50	248	11	345	20
Total	**1.238**	**90**	**1,395**	**78**

	2024		2025	
Average number of employees by professional category	Permanent	Temporary	Permanent	Temporary
Managers	34	-	33	-
Technical staff and middle management	209	9	254	4
Administrative staff	19	-	20	-
Workers	976	81	1,088	74
Total	**1.238**	**90**	**1,395**	**78**

Average number of employees per type of working day	2024	2025
Full-time	1,233	1,381
Part-time	5	14
Total	**1.238**	**1,395**

Employees with disabilities

At **Haizea Wind Group** we are strongly committed to non-discrimination, inclusion of persons with disabilities and universal accessibility, promoting the direct hiring of employees with certified disabilities. As of the end of 2025, there are 20 people with disabilities in the Group's workforce (17 people in 2024).

At **Haizea Wind Group** we guarantee that our selection processes do not exclude anyone when the requirements of the specific position allow it. On the one hand, Haizea Tecnoaranda complies with the requirement of 2% of employees with disabilities demanded by the General Law on Disability for companies with 50 or more employees. Although the foundry unit has a certificate of exceptionality issued by the local authority, the objective is established to increase the contracting of products and services to companies that employ persons with disabilities. Specifically, in 2025, we have collaborated with special employment centres for an amount of 67,372 (1.067 million euros in 2024), facilitating the entry of people with disabilities into the job market.

Haizea Bilbao has established an alliance with centres that employ people with disabilities, resulting in the integration of two employees from this type of centre.

Average salaries

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

Below is the breakdown of the average annual fixed remuneration (not including variable remuneration) corresponding to the 2025 financial year of **Haizea Wind Group,** distributed by gender, age and professional category:

Average remuneration by gender (€)	2024	2025
Men	31,462	36,628
Women	35,022	37,082
Total average	**31,765**	**36,666**

Average remuneration by age (€)	2024	2025
Under 30	26,322	29,872
Between 30 and 50	27,528	37,331
Over 50	35,196	39,351
Total average	**31,765**	**36,666**

Average remuneration by professional category (€)	2024	2025
Managers	97,741	103,948
Technical staff and middle management	40,808	48,816
Administrative staff	30,182	30,581
Workers	27,836	32,153
Total average	**31,765**	**36,666**

In relation to the category "directors" in 2025, the average remuneration for men is 109,000 euros (110,000 euros in 2024) and the average remuneration for women is 81,000 euros (72,000 euros in 2024).

Average remuneration has increased by approximately 15% compared to 2024 due to the update of the Collective Bargaining Agreement tables, category changes, seniority and the good performance of the workforce.

Haizea Bilbao, with the signing of its own agreement (2024-2026), average salaries are higher than the Bizkaia provincial agreement, with this difference being more significant among positions of responsibility or specialists.

Salary gap

The applicable collective bargaining agreements regulate the average remuneration of employees throughout the Group, establishing equity criteria between similar jobs regardless of gender. In this regard, both the remuneration of personnel subject to the agreement and that of personnel outside of it are established equitably, avoiding gender based discrimination.

The mathematical calculation of the gender pay gap, understood as the difference between the average fixed pay of men and the average fixed pay of women over the average fixed pay of men, stands at -1.2% (-11.3% in 2024), where a percentage below zero represents the percentage that women earn more than men.

This global figure, which represents a negative wage gap, is explained by the different distribution of job categories between men and women, with women being proportionally greater in technical and administrative positions compared to a greater proportion of men in blue-collar positions, where the average remuneration is lower. If we look at the salary gap by professional category and based on the hourly ratio, the differences that can be seen are associated with the seniority and responsibilities of the role in question. Below, we detail the wage gaps by professional category based on the fixed hourly salary:

Wage gap by professional category	2024	2025
Managers	15%	36%
Technical staff and middle management	3%	11%
Administrative staff	-6%	-11%
Workers	3%	6%

As a continuation of the work begun in the 2024 financial year with the signing of the new Haizea Bilbao agreement, in 2025 we have worked on the incorporation of measures to help reduce the wage gap and support equal opportunities.



Remuneration of the same or average jobs in the company

At **Haizea Wind Group** we have compensation policies in place, aimed at providing our employees competitive, homogeneous and equitable remuneration, allowing performance to be aligned with the assigned duties and responsibilities. Each job position has established salary ranges based on objective aspects, independent of gender, such as academic background, years of professional experience, and assigned responsibilities for that position, ensuring equity regardless of who fills the role.

Where there is an applicable collective bargaining agreement, the average remunerations are, at least, those established in the collective bargaining agreement, and in some cases there are company agreements that improve their working conditions.

In the Group, the minimum entry salary in 2025 (lowest position) has been 23 thousand euros (22 thousand euros in 2024), with a ratio to the national minimum wage of 1.39 (1.66 in 2024).

Number of layoffs

The breakdown of layoffs in the 2025 financial year of **Haizea Wind Group** distributed by gender, age and professional category is as follows:

Number of layoffs by gender	2024	2025
Men	16	19
Women	2	6
Total	**18**	**25**

Number of layoffs by age	2024	2025
Under 30	2	4
Between 30 and 50	16	17
Over 50	0	4
Total	**18**	**25**

Number of layoffs by professional category	2024	2025
Managers	1	1
Technical person and middle management	5	5
Administrative staff	0	0
Workers	12	19
Total	**18**	**25**

2025, the voluntary turnover rate was 5% (6% in 2024), with 80 voluntary departures due to resignations and sabbaticals (73 in 2024).

In addition to the previous layoffs and voluntary departures, there have been 75 exits mainly associated with retirements and contract terminations (66 in 2024).

In the new agreement signed last year 2024 by Haizea Bilbao, new rotation management procedures were included, such as exit interviews for employees (voluntary resignations, unsuccessful test periods and leaves of absence) who leave the Group.

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

The Group is aware of the importance of rationalising work schedules to seek a balance between personal and professional life. In this regard, flexible start and finish times are available in the office areas, allowing for better management of work, personal and family responsibilities.

The agreement for Haizea Bilbao recognises the right to digital disconnection outside of work time, respect for rest time, permits and holidays, as well as personal and family privacy.

Likewise, in January 2025, the hybrid teleworking model was implemented in Haizea Bilbao as a work-life balance measure, as a result of a joint development process with the legal representatives of the employees. This implementation has been accompanied by specific training actions on work and digital disconnection, with the aim of ensuring responsible use of technological tools and reinforcing a culture of respect for rest times.

Social benefits

At **Haizea Wind Group** there are a number of social benefits offered to employees to promote their well-being and foster a healthy working environment. These measures include flexible



remuneration such as: restaurant vouchers, transport vouchers and childcare vouchers.

In addition, the company has as an optional benefit medical insurance for all Group staff, free of charge for directors and officers and their families. Specifically, Haizea Tecnoaranda has a private medical insurance through which different workshops to improve the quality of life are made available to workers on a monthly basis.



At Haizea Bilbao, medical insurance has been introduced for staff in positions of responsibility, with the possibility of voluntary membership also being extended to the rest of the organisation's employees under preferential conditions. In addition, the company offers a daily menu service, accessible to office staff, thus facilitating work-life balance and well-being during the working day.
In order to reinforce the social benefits policy, a flexible remuneration system was implemented, which includes restaurant vouchers, childcare vouchers and transport vouchers, allowing employees to optimise their remuneration in accordance with their personal and family needs.
In addition, the bus transport service for shift workers was extended, increasing both the routes and the departure and arrival areas, in order to improve accessibility and facilitate commuting to and from work.

6.3.2. Work organisation

Organisation of working time

At **Haizea Wind Group** we respect the breaks established by the applicable agreements. Therefore, the organisation of work time is different in each business, and each one has its own work schedule.

In Haizea Bilbao, the indirect workforce has a split shift while the direct workforce is organised into three rotating shifts: morning, afternoon and night. On the other hand, flexible entry hours are available to facilitate the reconciliation of staff and in 2024 a Telework Policy was included (in force in 2025), which offers the possibility of teleworking one day a week. Finally, Haizea Bilbao is also working on a new overtime management procedure to ensure compliance with the established working day.

At Haizea Tecnoaranda, the work schedule is negotiated based on the guidelines established by the Workers' statute and the steel and metallurgical bargaining agreement of the province of Burgos. This schedule was distributed and published and is available to all employees. In addition, there is a clock in / clock out system for direct personnel.

Haizea Tecnoaranda has a flexibility model whose objective is adapting to the needs generated by a three-shift model and to the excesses posed by a fourth shift. The main benefits resulting from flexible hours are as follows:

- Increased competitiveness, having the ability to adapt to client needs.
- Increased flexibility to adjust its productive capacity to real needs based on the workload, both for increase and reduction.
- Improvement in the planning and organisation of work shifts.
- Improvement and stability in employment, since the internal management of the working day prevents the use of external measures.

The new Haizea Tecnoaranda Equality Plan includes the following measures, in addition to those established legally, to promote balance of work and personal life:

- Reduced hours, flexible schedules, shift changes, teleworking, unpaid leave and the possibility of combining the reduction of working hours into full days.

With regard to Haizea Grupo WEC, the work calendar is reported to the Works Council. On the one hand, indirect labour has a split day from Monday to Friday, and flexibility of entry and exit; on the other hand, most of the direct labour force has an 8-hour day, in three shifts, with a break in the middle of the day. All employees have the possibility of requesting shift changes. In addition, there is a clock in / clock out system for direct personnel. On the other hand, we have a clock in / clock out system for indirect personnel, in addition to a terminal, through our portal (phone or computer).

Absenteeism

In **Haizea Wind Group** we monitor the absenteeism that occurs within the Group, understanding labour absenteeism to be the non-fulfilment by workers of their work day due to sickness absence, work accidents, maternity leave, union hours, leave allowed by the collective agreement, sabbaticals, and absences due to unpaid leave, amounting to 298 thousand hours during the 2025 fiscal year (217 thousand hours in 2024). The total absenteeism rate in 2025 was 12.9% (13.1% in 2024). The increase in lost hours is offset by the increase in total hours worked, due to the higher number of employees during the year.

With the aim of improving the absenteeism rate, we hold meetings to find out the causes of absenteeism and, based on the information obtained, a series of actions are implemented weekly to reduce it.

Measures aimed at facilitating the enjoyment of work-life balance and promoting the co-responsible exercise of these by both parents

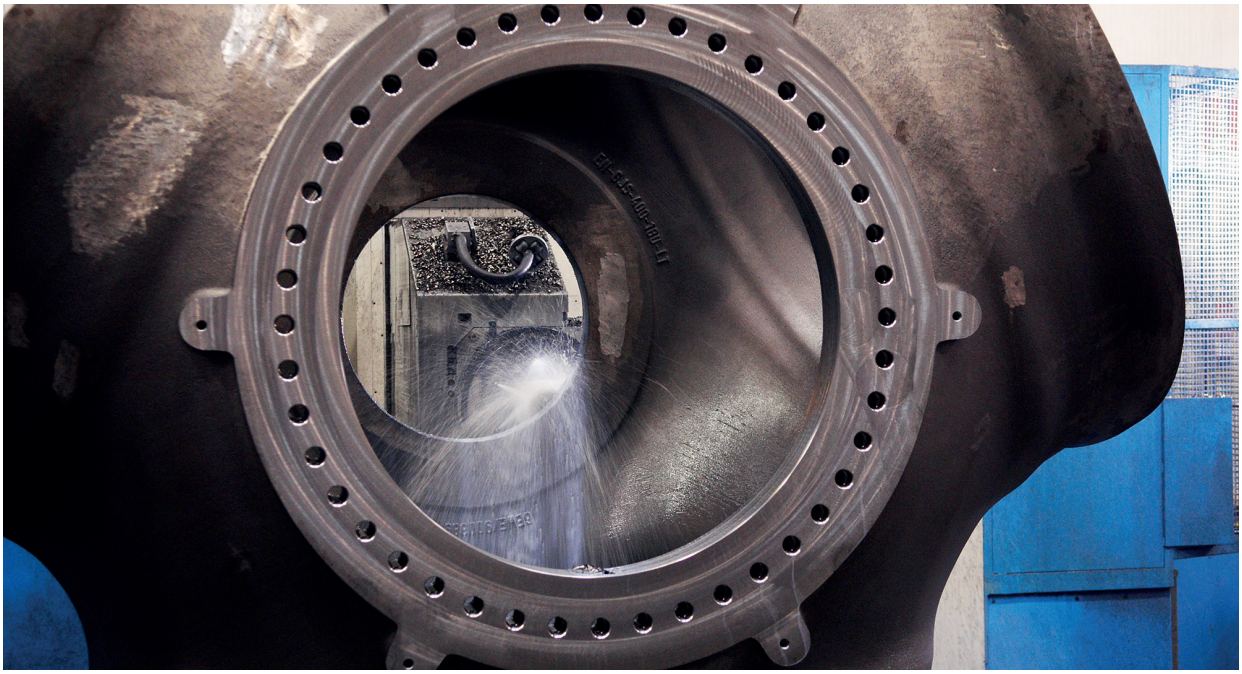
In order to facilitate the work-life balance of staff, at **Haizea Wind Group** we have implemented a series of measures that consist in reducing working hours and adapting schedules based on personal situations that go beyond the assumptions laid down in the Workers' Statute or applicable agreements.

We have family balance policies, the objective of which is to encourage all employees to achieve an appropriate balance of work and family life.

The Group continues to work on promoting the personal and professional work life balance of its employees, in addition to incorporating new practices that allow employees to disconnect from work duties. In the same way, pregnancy periods, maternity and paternity leave and breastfeeding leaves are respected beyond the applicable legislation, facilitating their application based on the employee's needs.

The parental leave data is detailed below. A 100% return to work rate is observed in the period covered by the report after ending the leave:

Parental leave	2024	2025
Total number of employees who have been entitled to parental leave	52	68
Total number of employees who have taken parental leave	52	68
Total number of employees who returned to work in the reporting period after ending parental leave	52	68
Return to work rate	**100%**	**100%**
Total number of employees who have returned to work after ending parental leave and who were still employed 12 months after returning to work	31	65
Retention rates of employees who took parental leave	**57%**	**95%**





6.3.3. Health and Safety

It is important to note that in February 2024 a change took place in the prevention service at Haizea Bilbao, moving from an external prevention service to an in-house one. This in-house prevention service is supervised by the HSE Management, accompanied by two senior occupational risk prevention technicians and two intermediate technicians, all working exclusively on occupational risk prevention management.

Since the establishment of the company's own prevention service, a specific department dedicated exclusively to environmental issues has been set up. A performance report on psychosocial risks was also produced in 2025.

Significant improvements have been implemented in the accident reporting and investigation system. Through a communication form, accidents are reported directly to the HSE manager, who in turn forwards them to a common email address for accidents and incidents, ensuring the dissemination of information to numerous members of the organisation. This system has been complemented by modifying the reporting formats, incorporating various methods of analysis and facilitating meetings with the departments involved to define and agree on the necessary preventive actions, with the aim of avoiding the repetition of similar incidents.

In the area of prevention, Safety One Point Lessons (SOPL) are conducted during shift changes. These talks are given by managers and team leaders to remind workers of the safety rules to be followed, as well as any prohibited behaviour or errors detected.

In addition, the HSE department has contracted new software for the integrated management of occupational risk prevention and health surveillance, allowing all relevant information to be centralised on a single platform.

In October 2024, during a meeting of the Health and Safety Committee (HSC), it was agreed to set up a working group to define and implement an addiction prevention plan to address potential problems related to these issues in the workplace.

Throughout 2025, various training courses were held on occupational risk prevention, both in compliance with the agreement and in work teams, as well as on the basic level of prevention. These trainings have been made possible by the increase in preventive resources, reaching a total of 21,267 hours of training (18,751 hours in 2024).

A system for reporting observations and defects via a QR code has been implemented in SharePoint. This system allows any person present in Haizea Bilbao's facilities to report, through a form, unsafe behaviour or defects in the facilities. The reports are grouped into a list that is tracked on a weekly basis, allowing detailed tracking of defects by area until resolution. Observations of unsafe behaviour are analysed and, where necessary, reinforced through SOPLs, with reminders of the safety rules to be observed. In addition, a foot scanning campaign was carried out during the 2024 financial year to improve the wellbeing of workers with podiatric problems by providing special insoles and appropriate footwear. In order to promote a preventive culture among middle management, weekly meetings were set up to resolve doubts about occupational risk prevention and to reinforce training in both existing procedures and new procedures implemented.

In order to involve workers in safety issues, a competition called "Haizea Bilbao Safety Week" was organised, based on the Kahoot game, on safety rules. The competition was very well received, with prizes consisting of Amazon gift cards, and more competitions are being considered for the future.

In addition, the Kaizen 5M method for continuous process improvement was implemented, starting with a comprehensive review of a workstation in the submerged arc process. The process included risk assessment, review of procedures, validation of worker training and assessment of the machine for compliance with safety and quality standards, including the presence of its manufacturer's manual and CE certificate. The defects found were recorded and are being followed up until they are resolved.

The working environment is also being improved by applying the 5S principles to optimise workplace organisation, such as the correct arrangement of tools and equipment, as well as the marking and painting of storage areas.

Finally, audits are being carried out with registration to assess compliance with safety and operational standards.

Health and safety conditions at work

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



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

- To comply with current legislation regarding Occupational Risk Prevention and the Environment.
- To promote a culture of occupational health and safety in the activities of all our employees, guaranteeing our commitment to providing adequate health and safety conditions, and the exercise of participation and consultation, thus complying with the highest health and safety standards, both in terms of the law and specific to the organisation.

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

Within the new projects and works, the dynamic of sharing information and learning about accidents between the different plants of the Group has begun.

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

Additionally, at **HWG** we have specialised personnel who develop functions focused on the continuous improvement of our practices and procedures and the obtaining and maintenance of internationally recognised certifications for risk prevention systems, such as the ISO 45001 certification that we have in our plants. (Haizea Bilbao, Haizea Tecnoaranda and Haizea Grupo WEC). This is the most important technical specification to proceed with the implementation and management of occupational risk prevention systems. It specifies the requirements for an occupational health and safety management system so that organisations control occupational risks and thus improve their performance and results in this area. By obtaining this certificate, which is completely voluntary, the Group demonstrates its proactivity in exceeding legal requirements and achieving levels of excellence in occupational health and safety. Obtaining the certificate implies improving all aspects related to the health and safety of the people in the organisation.

In addition to the above, we have other policies, procedures and specific actions, whose objectives are aligned with the Comprehensive Health and Safety Policy, detailed below:

Haizea Bilbao

We have a **department for improving production** functions, made up of three people, which has a close relationship with Occupational Risk Prevention, designing different customised aspects to improve health and safety.

Observations Observation CAR: suggestion box for employees to express any health and safety aspects that they believe should be improved. This mailbox is collected weekly by the human resources manager.

Tool Box: safety talks at shift changes, to comment on aspects that are wrong and what the corresponding improvement action would be.

Políticy to preserve the health and safety of our people, associated with alcohol and drug prohibitions.

Physiotherapy and IMQ Services to treat physical and mental health.

Additionally, a great effort has been made to **improve the health and safety management and documentation system,** highlighting the following:

- Critical equipment procedure, which defines the method to evaluate the criticality of the equipment that will be taken into account in the preparation of specific instructions, among other aspects.
- Procedure for infractions and sanctions, which establishes a system of disciplinary actions in the event of non-compliance with internal Health, Safety and Environment standards, aimed at reinforcing the importance of respect for these standards and stimulating cultural change and a proactive attitude towards these matters.
- ATEX installation procedure, which establishes the main areas where explosive atmospheres can be found in the plant and defines the main measures to avoid them.
- Lifting plans: containing instructions for the movement of loads to be conducted with the different equipment that the plant has.
- Improvement of PPE, focusing on guaranteeing the comfort of employees, in relation to equipment such as welding masks or footwear.

Haizea Tecnoaranda

Own **IT tool** for better management of accident rates, accidents, incidents, periodic monitoring, evaluations and preventive measures to be applied.

KPIs: periodic monitoring of the main indicators is carried out, conducting the relevant investigations on accidents, improvements, reports, etc.

Audits: Weekly audits of working conditions and workshop conditions are conducted.

In addition to the above, **meetings are held with employees** whose job is associated with greater danger, and with employees who have suffered accidents, whether with or without sick leave.

Risk assessment by workstation: Risk assessment by job: For each job, a job evaluation has been conducted, detecting the risks associated with it. In addition, depending on the position, different training associated with workplace health and safety has been provided. A risk assessment was also conducted on all machinery and all sections, and evaluations of specific jobs have been conducted, such as changing the roof.

Carrying out hygiene assessments:
Measurements of exposure to chemicals, noise and electromagnetic fields are carried out.

Training: During 2025, retraining has been carried out for all employees who completed their initial

training 4 years ago. In addition, we have taken up theoretical and practical training on issues such as working at heights, working in explosive atmospheres, ergonomics and postural hygiene and electrical work.

Tecnoaranda Academy, a new online training platform available to all employees, was also launched in February 2024. As part of the presentation of the platform to employees, training was given on noise, ergonomics, confined spaces, electromagnetic fields, gas cylinders, among other subjects.

Psychosocial risk assessment: Psychosocial risk assessment: In 2024, a psychosocial risk assessment was conducted by contracting a prevention service and conducting a survey using the FPSICO method. The objective of this evaluation is to analyse those aspects of work related to the organisation, content and performance of tasks that may affect both the well-being and health (physical, mental or social) of employees and the development of the work itself. The results obtained were very positive, since 67% of the issues evaluated concluded that the situation in TecnoAranda was adequate, reflecting a satisfactory level of compliance and management in the matters analysed.

Taking into account that psychosocial factors can affect motivation and satisfaction at work, and generate stress depending on the perception that the worker has of them and their abilities to face or respond to them, at Haizea Tecnoaranda we have understood this evaluation of psychosocial risks as an opportunity to obtain an x-ray of how the company is in these aspects and establish preventive measures in order to improve the situation.

Working instructions: In order to guarantee the standardisation and safety of the processes, we have specific work instructions that are known to all employees.

Weekly security meetings: We hold weekly sessions in which we deal with the most relevant



safety issues, such as accidents, non-compliance in ORP, incidents or periodic plant control. In addition, minutes are taken after the meeting and made available to all workers.

Security induction video for visitors: Before the visitors arrive at the plant, an explanatory video is made available to them so that they are aware of the main rules and procedures to be followed.

Medical examinations: The organisation encourages and promotes the monitoring of the health and wellbeing of workers, and therefore, on an annual basis, a medical check-up is carried out on each worker, in accordance with the protocols established by the occupational medicine specialist according to the data from the risk assessments of each position.

Other information: In order to enhance the company's communication with workers, there are information boards on accidents that have occurred and the status of their investigation, results of hygiene measurements, members of the emergency teams, training to be given, etc. There are also screens in the manufacturing area through which information and safety messages can be sent, and there is a suggestion box and communication with the safety department. In addition, we have a new human resources platform, META4, from which safety information is also provided to employees.

Haizea Grupo WEC

From the third quarter of 2023, the figure of Health and Safety Manager will be incorporated into the company with the consequent promotion of all activities related to this matter, with the aim of raising awareness among all staff of the importance of these issues and incorporating them transversally to all areas, from the design to the production process. This will consolidate the preventive culture project for raising awareness and instilling safety values in the day-to-day life of the plant.

We have different **procedures,** such as the contingency plan, the environmental emergency plan, the planning of preventive activity, the evaluation of occupational risks, health surveillance, the emergency plan, the control of new processes, communication and participation.

We highlight the following initiatives that started in the 2024 financial year or have continued from previous years, and that remain in force for the 2025 financial year:

- In 2023, the **Health and Safety decalogue** in the foundry unit was reviewed and improved, and a calendar was created for the preparation of specific work instructions for the most critical aspects and in which the greatest difficulty in implementing the health and safety measures is detected. In 2024, the development of these instructions continues, and they are constantly updated according to the requirements of the time.

- **"The Safety Hour":** Activity in the foundry, aiming to increase preventive culture and demonstrate that there is a specific direction in this regard from management. It takes place weekly and involves, above all, the personnel that is most involved in operations, to detect possible risks and identify improvement actions for which responsible implementation schedules are defined. The operation consists of a multidisciplinary team of 4-5 pairs conducting safety walks in the plant, with the aim of observing tasks, facilities or behaviours, to implement, improve or correct safety aspects.

- **"Weekly Safety Dialogue (DSS)":** An activity in which a specific safety-related topic is discussed every Monday across all shifts, involving middle managers and their staff (for example, incidents that have occurred or the use of forklifts). The quality of these communications is monitored by the health and safety department.

- **Accident investigation process:** In 2023, the accident investigation procedure was modified to enhance the quality of investigations and the solutions provided, with a particular focus on the most serious or potentially serious incidents. Thus, accidents are classified by severity (A, B and C), with each type of accident corresponding to an investigation method: types A are obligatorily investigated with the Ishikawa diagram or with a tree of causes, while for types B and C you can choose between the "5 whys" method or the Ishikawa diagram or tree of causes. In this way, the accidents that have occurred are evaluated, and the necessary safeguard measures are put in place to prevent their reoccurrence.

- **Monthly Prevention Forum:** Health and safety KPIs are analysed, and the measurements scheduled for the month are reported. In 2024, these forums were especially focused on risk detection, action monitoring, and accident investigation.

- **Constant communication** between the health and safety manager and the section heads, as well as with the shift supervisors, whom he accompanies in weekly plant inspections.

- **Safety benchmark:** An in-depth search has been conducted for the best practices in the sector with regard to health and safety, in order to internally improve processes and measures.



- **Meetings after returning from leave:** With the aim of reducing the rate of accidents, the practice of holding a meeting led by the Human Resources Department with the people who join the team after leaving has been established. In these meetings, employees are informed of the improvements implemented, the results of the investigation are shared, and used to track the absenteeism indicator. In addition, the employee tells their section about the incident to raise awareness among the rest of the team.

- **Operating subsidies:** Haizea Grupo WEC has focused its efforts on increasing the number of hours of training in Health and Safety. During this year, not only have the training courses regulated in the agreements been developed,



but also training courses have been given in other areas such as the Group's emergency plan, training in silica, explosive atmospheres, etc.

- **Suggestion box:** the improvement department launched a suggestion box in 2023 to receive proposals for improvement in health and safety matters, which is still in operation this year.

Safety management with subcontractors

With the aim of providing 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 equipment, we focus our efforts on promoting a safe work environment for outsourced company personnel working within our plants.

Before starting work, we ensure that all subcontractors have up-to-date labour and safety certifications, and we pass on our manuals and safety instructions to them. In most of the Group's companies we use digital platforms to send information, ensure reading/training of security measures, and personnel control at the entrance.

Our procedures for investigation and continuous improvement of safety measures when accidents occur include within their scope incidents that occur with subcontracted companies. In addition, our safety inspection staff monitors both our teams and external people who work in our plants.

We have different channels and points of contact to discuss health and safety issues with our collaborators. The most relevant subcontractors report to us the safety talks/trainings they give each week, as well as the periodic controls they conduct. Furthermore, prior to the start of work, meetings are held with subcontractors with the participation of the Prevention and Maintenance service.

Looking ahead to 2025, the aim is to increase this integration of subcontractors in all procedures that integrate health and safety, by calling regular subcontractors to different information meetings at the company's facilities. At Haizea Grupo WEC, subcontractors have been incorporated into the new accident investigation procedure, as well as the rest of the work instructions. Thus, all accidents involving employees of subcontractors are considered internal Group accidents, and the person responsible for the subcontractor is also included in the investigation procedure.

Health and safety monitoring indicators

At **Haizea Wind Group** we firmly believe that health and safety is an essential and priority issue due to the nature of the activity we perform. Our goal is always “zero accidents” and the guidelines for action are transmitted from the highest levels of the organisation. This objective is applicable to all people involved in the Group's facilities.

Haizea Wind Group carries out a study of the accident rate and calculates the frequency and severity indices shown below:

	2024		2025	
Accident rates by gender	Men	Women	Men	Women
Frequency index	12.16	-	11.84	9.23
Severity index	2.05	-	2.87	0.83
Occupational illnesses	2	-	4	-
Number of deaths	-	-	-	-

Although lost-time accidents have increased somewhat in 2025 (from 14 to 18), the frequency ratio of lost-time accidents per million hours worked has decreased slightly.

With regard to subcontractors, the following figures are shown:

	2024		2025	
Accidents due to subcontractors/contractors	Men	Women	Men	Women
Number of work accidents without sick leave	5	0	7	0
Number of work accidents with sick leave	7	0	6	0



6.3.4. Social relationships

Organisation of social 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, covenants and agreements signed, where applicable, with the corresponding workers' representatives.

Dialogue and negotiation are part of the way to address any difference or conflict with the Group's employees. The main communication channels with employees, in addition to the Unions, are physical notice boards, conversations through the Works Council and the Health and Safety Committee, and internally distributed emails and physical meetings.

Additionally, we have employee portals that allow us to conduct different internal procedures, such as issues related to payroll and other human resources procedures, in addition to being used as a document manager so that all employees have access to policies, protocols or work calendars, among others.

Percentage of employees covered by agreement by country

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

At Tecnoaranda, the applicable agreement is also the agreement for the iron and steel industry, which runs until 2026. Finally, in the case of WEC, each plant has its own agreement. While in the machining and treatment plant the applicable agreement remains in force until 2026, in the foundry plant a new agreement has been signed in 2025 and will remain in force until 2029.



Balance of 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, conducting control and monitoring of these conditions through the Health and Safety Committee that meets periodically at least every two months and is made up of equal parts of employee representatives and company representatives, and which is always attended by the External Prevention Service, as a guest.

In the Health and Safety Committee meetings, the issues that are previously listed in the corresponding agenda are addressed, all related to the health and safety of employees. The result of these meetings is recorded in the minutes in which all the topics discussed are recorded, indicating the department or person who must perform the security measures and with a forecast of the execution dates.



6.3.5. Training

At **Haizea Wind Group** we are aware that the training of all our employees constitutes the basis of the Group's growth and success. Therefore, we recognise the strategic value of correctly managing training, articulating initiatives, processes and procedures that allow real and effective development of all our groups. Our objective is to disseminate and share the existing knowledge in the Group, as well as to progressively and increasingly generate knowledge and training in employees aligned with the organisation's strategy. Our commitments regarding training are reflected in the corresponding policies.

To carry out the above objectives, there are annual Training Plans, which are developed specifically for each type of personnel. Training Plans are prepared based on the detection of employee training needs. At the end of the year, existing needs are detected (through interviews by area, competency matrices for jobs, strategic plan, etc.) and are included in the following year's plan. The objectives that we take into account for knowledge management are the following:

- Defining the knowledge required to perform the job.
- Establishing a system for the detection of knowledge within the organisation.
- Implementing models that allow knowledge to be distributed and shared within the organisation.
- Detecting training deficiencies within the organisation.
- Developing training plans that help improve knowledge.
- Creating support systems to store and distribute knowledge.

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

In this context, in 2025 we have developed training actions appropriate to the needs of our people, increasing the number of total training hours to 21,267 hours (18,751 hours in 2024), with an approximate investment in 2025 of €264,000 (€437,000 in 2024).

The main topics addressed in the training activities developed were as follows:

- Prevention of occupational hazards.
- Specific safety training for jobs with the highest accident rates.
- Guidelines for action in emergency situations.
- Specific training for positions at Haizea Tecnoaranda (painting, maintenance).
- Coaching.
- Training in leadership and teamwork.
- Advanced Quality Planning (APQP).
- Excel.
- Power BI.
- Languages.
- Training on the new Equality Plan at Haizea Tecnoaranda.
- Sustainability for the purchasing team of Haizea Bilbao S.L.

At Haizea Bilbao, part of the technical training given to workers is aimed at obtaining internationally recognised certifications, which enable and qualify them professionally for the performance of specialised functions. These certifications include FROSIO, SPMT, International Welding Technician, Level 2 in Liquid Penetrant Testing (N2 PT), Visual Inspection (VT) and other accreditations in Non Destructive Testing, among others.

In addition, the development of the digitalisation of numerous aspects related to labour relations between the Group and its employees (such as the intranet, time management or the holiday request process), as well as the incorporation of teleworking as a work-life balance measure, have resulted in the need to provide various training courses on digitalisation. In this respect, various staff training programmes are planned for 2026, taking into account the different levels of digitisation in the workforce.

The distribution of training hours by professional category for the years 2024 and 2025 is as follows:

Training hours by professional category	2024	2025
Managers	460	256
Technical staff and middle management	4,016	4,643
Administrative staff	61	331
Workers	14,213	16,037
Total	**18,750**	**21,267**
Average number of training hours per employee	10,05	14,43

In the field of training, it is worth mentioning the training programme *HWind*, which has developed a two-day training course at Deusto, aimed at a group of around 15 people, focusing on Culture, Values and Leadership:

- **Business objective:** support people in management positions in the development of business and management skills to consolidate knowledge and/or assume new responsibilities within the company.
- **Learning objective:** provide participants with the necessary skills to assume greater responsibilities under their strategic context and the continuous growth of the company.

Finally, reference should be made to the establishment of "Tecnoaranda Academy" at Haizea Tecnoaranda, a new training platform provided to all plant employees. Thanks to this platform, there has been a significant increase in the range of training courses, with a focus on Compliance, Equality Plan, Information Security, criminal risks, and other cross-cutting subjects.

6.3.6. Accessibility

Any new investment in industrial and service buildings in the physical environments of the Group's companies, as well as any adaptation or conditioning of general service equipment and facilities, is planned in accordance with the regulations and accessibility standards of the 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, sex, sexual orientation, language, religion, political opinion or any other national or social origin, economic position, disability or any other condition.

Faithful to the commitment assumed in our Code to ensure the protection of individuals' fundamental rights, we have a protocol against sexual and gender-based harassment, aimed at establishing the necessary measures to ensure prevention and action against any form of harassment at work.

The main body responsible for managing complaints or communications regarding harassment is the Ethics and Compliance Committee, tasked with handling and resolving all complaints, grievances, claims, suggestions or queries related to unresolved harassment situations through informal procedures.

The Group has Equality Plans distributed to all staff and accessible on the intranet. In the Equality Plans, a diagnosis is made of each of the human resources issues affecting equality, with specific areas of action indicated in personnel selection, hiring and promotion, training, salary compensation, co-responsibility, harassment prevention, communication, and awareness. All of this aims to establish measures to achieve real equality between men and women, ensuring full and effective compliance with the principle of equal treatment between women and men, and not tolerating behaviours or actions that involve or could potentially involve, directly or indirectly, gender-based discrimination.

A documented follow-up of the implemented actions is carried out in an annual report, which is also distributed to employees. To ensure compliance with this, an Equality Committee is in place, and awareness courses have been provided to employees.

These Plans are periodically reviewed and updated. Specifically, at Haizea Tecnoaranda, a new Equality Plan was agreed in 2023, incorporating issues



related to work-life balance and disconnection. Likewise, in 2024, both Haizea Bilbao and Haizea Grupo WEC developed an Equality Plan being implemented in 2025.

Additionally, at Haizea Tecnoaranda, we have an Integration Policy committed to working on the labour integration of different groups at risk of socio-labour exclusion. The principles on which this Policy is based, governing the actions of the rest of the Group's companies, are as follows:

- **Not having prejudices or stereotypes:** professionals are valued for their professional skills and personal attitudes, not for their condition, gender, or physical abilities, unless these truly hinder them from carrying out their tasks; otherwise, they should not be taken into consideration.

- **Objectivity, key to labour integration:** establishing a precise job search, focused on the shortcomings that the organisation has without considering other aspects, facilitates selection based on inclusive criteria.

- **Culture of equality:** Hiring professionals who believe in work integration is one of the best policies. Each person has an impact both through his/her performance and their ability to influence others in relation to work integration. Inclusion and participation: Workplace inclusion is encouraged and improved when hired people can contribute and express their ideas. This assessment improves their commitment and helps them to be recognised within the organisational structure based on their professional skills.

Finally, it should be noted that Haizea WEC Group has drawn up a Protocol for the Prevention of Harassment, Violence in the Workplace and Acts of Violence in the Workplace and Information on Respect for Human Rights.





7. Information on respect for human rights

7.1. Group Policies

At **Haizea Wind Group** we have several policies aimed at maximising the positive impact and lead progress from ethical, responsible and sustainable parameters, among which the following stand out:

The General Code of Ethics and Conduct, encompassed in the firm sustainability strategy that allows the Group to voluntarily comply with high social and environmental standards, as well as commitments to transparency and responsibility. This Code assumes the commitment to act at all times in accordance with the United Nations Global Compact, whose objective is the adoption of universal principles in the areas of human and labour rights. All actions of the Group must maintain scrupulous respect for the Human Rights and Public Freedoms included in the Universal Declaration of Human Rights.

It should be noted that in 2024 Haizea Wind Group joined the United Nations Global Compact jointly, demonstrating its objective of adopting the practices set out in it at corporate level.

The main milestone for 2025 is, on the one hand, the unification of criteria in integral policies, whose objective is to advance towards the homogenisation of criteria at group level in 2026, although the process has begun in 2025; and, on the other hand, the corporatisation at group level of the new Code of Ethics, managed through Audidat, with the aim of consolidating a common compliance framework for the entire organisation.

In the area of Data Protection, *Audidat* has been registered as Data Protection Officer (DPO) for all Haizea companies during 2025, and has worked on the harmonisation of criteria and the implementation of comprehensive training in all plants. In addition, all companies now have a corresponding DPO.

7.2. Key risks identified

In relation to human rights, the Management has identified risks that, despite not being considered significant given that our plants are located mainly in Spain, are subject to periodic review due to the possible impact they would have if they materialised. In this way, the main risks identified are the following:

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

The mitigating measures and plans implemented in these areas are developed 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, considering them fundamental and universal, according to 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 those rights that we consider fundamental are:

- The right to non-discrimination based on race, creed, colour, nationality, ethnic origin, age, religion, sex, gender reassignment, sexual orientation, marital status, connections with a national minority, disability or other status.
- The right not to suffer 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 providing fair remuneration and working hours, facilitating a healthy balance between work and private life. In addition, we declare our commitment to the establishment and development of policies that integrate equal treatment and opportunities between women and men, without discriminating directly or indirectly on the basis of sex, as well as to the promotion and encouragement of measures to achieve real equality within the organisation, establishing equal opportunities between women and men.

Within the General Code of Ethics and Conduct, we explain the principles that we have in the Group, which include the following related to human rights:

- Each and every one of the members that make up the Group are obligated to maintain scrupulous respect for the Fundamental Rights and Public Freedoms included in the Universal Declaration of Human Rights of 1948, 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 intended for the protection and observance of fundamental rights and public freedoms recognised in Spanish territory.
- No subcontracting will take place with companies that do not respect the rights of employees, the provisions related to health, safety and hygiene at work, including those related to the prevention of occupational risks, or that have hired personnel whose employment situation does not comply with the requirements prescribed in current legislation.
- To the extent of its possibilities, the Group will help employees, managers and directors to achieve their professional aspirations, if they request this.

At **Haizea Wind Group** we do not use child or forced labour. We do not tolerate employment conditions or treatments that 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

At **Haizea Wind Group** we make available to the Group's employees an Internal Communication and Complaints Channel to promote compliance with the General Code of Ethics and Conduct through which they can communicate anything that may be considered a breach of this.

This channel serves to communicate facts or situations that are or may be contrary to the General Code of Ethics and Conduct, its policies and procedures, contrary to good business practices, or contrary to legality.

So that everyone in the Group can immediately report any real or potential violation, we have made available to employees several means of communication.

All cases received are studied, and if any violation of the policies is identified, the relevant measures are adopted. In this regard, the Ethics and Compliance Committee has a specific protocol for handling the complaints received.

During the 2025 financial year, the whistleblowing channel was updated, outsourcing its management to Audidat, which is an important point of improvement in terms of independence and transparency within the compliance system.

This channel is available on all company websites as well as on the corporate intranet.

During the 2025 financial year, 9 complaints were received through this channel, all of which were resolved and reported to the Compliance Committee.

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

As mentioned previously, the General Code of Ethics and Conduct contains a principle of eradication of child labour, so no company or supplier of the Group will resort to child labour, and must ensure compliance with the provisions of the International Labour Organisation. (ILO) in relation to the work of minors.

In addition, one of the principles that we manage in the Group is to “Respect freedom of association and the right to collective bargaining”, with employees, without any distinction, having the right to join or establish unions of their choice, as well as to negotiate collectively.


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8. Information regarding anti-corruption and bribery matters

8.1. Compliance and good corporate governance

8.1.1. Group Policies

At **Haizea Wind Group** we carry out our activity by publicly declaring our commitment to ethical and transparent behaviour as an essential factor to generate value, improve economic efficiency and reinforce the trust of our stakeholders. In recent years we have been developing our Compliance System, which is based on the recognition of the fundamental importance for us of establishing an ethical culture of compliance and zero tolerance towards criminal acts and conduct.

In June 2023, two independent directors were appointed and the Audit and Compliance, Appointments and Remuneration, and Strategy and Investment Committees were established.

We have an **Anti-Corruption Policy** whose objective is respect for the fundamental principles against corruption included in the United Nations Convention, committing to work against corruption in all its forms, including extortion or incitement to crime, bribery, conflict of interest, influence peddling, document falsification, money laundering, use of privileged information and fraud, resulting from any of the aforementioned practices.

The Group's **Criminal Risk Prevention Manual** aims to make this commitment official, as well as conduct its businesses in a socially responsible manner, acting with a philosophy of zero tolerance for acts that contradict its organisational principles. In this area, we also have a Criminal Risk Matrix updated by Haizea Bilbao, Haizea Tecnoaranda and Haizea WEC Group Departments and Divisions, all of which are complemented by a Criminal Risk Report. An Action, Training and Dissemination Plan has also been created to serve as a guide for the body in charge of monitoring, reviewing and verifying this PRP System.

These principles and behaviours are reinforced by the Group's Code of Conduct, which aims to facilitate day-to-day operations 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. These principles and behaviours are reinforced with the Catalogue of Prohibited Conduct that is applicable to our entire 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 to third parties dependent on our organisation.

The previous documents define and establish the principles of action and behavioural guidelines that must govern the actions of the Group's directors and employees in the exercise of their functions with respect to the prevention, detection, investigation and remedy of any practice.

Finally, as reported in last year's EINF, **HWG** has continued to develop the Internal Audit Function by outsourcing this service to an independent consultant. Its purpose, as in any entity, is to strengthen the organisation's ability to create, protect and sustain value by providing independent, risk-based and objective assurance, advice,

insight and foresight to the Board, the Audit and Compliance Committee and Group management. In its first year, the Function has designed a three-year risk-based Internal Audit Plan (2025-2027) which has been approved by the Audit and Compliance Committee, and has carried out the internal audits planned for this year, periodically reporting the findings and recommendations to the Audit and Compliance Committee. In addition, the risk map drawn up the previous year has been updated and reported to the Commission and subsequently to the Board for approval. Finally, management has continued with the implementation and streamlining of the Internal Control over Financial Reporting System (ICFR) by documenting these controls and evidence on a digital platform.

8.1.2. Key risks identified

The Criminal Risk Matrices prepared have served as a starting point for the identification of the main risks affecting the different **Haizea Wind Group** companies in terms of compliance.

Firstly, the hypothetical criminal risks associated with the activities carried out in the Group's companies have been detected and analysed which, in accordance with article 31 bis of the Spanish Criminal Code, could give rise to criminal liability of the legal entity or accessory consequences provided for in article 129 of the Criminal Code. Secondly, once these risks have been specified, the general and specific control measures implemented by the companies to reduce their exposure to the risks detected have been identified in the **Haizea Wind Group**'s Criminal Risk Prevention Manual. Finally, taking into account the likelihood of the risk materialising, its impact on the organisation's business and reputation and the number of controls in place to prevent it, the inherent risk and residual risk of each of the companies were determined.

The main risks that we have considered are those related to activities such as relations with Public Administrations, political or associative activities, donations and sponsorships, relations with suppliers, relations with clients, and the offering, delivery and acceptance of gifts or personal benefits.

8.2. Managing anti-corruption and bribery matters

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 constitute key tools to prevent possible corruption, bribery and money laundering activities. In addition, we have an Ethics and Compliance Committee, whose functions include the management of the Internal Communication Channel and Complaints regarding non-compliance with the General Code of Ethics and Conduct and the Criminal Risk Prevention Manual.

We encourage our human team to act with integrity, diligence and impartiality in decision-making and in relationships with third parties. To this end, in addition to the aforementioned protocols and procedures, we have internal prevention measures, among which we highlight the following:

- Use of transfer and other foreign trade payment mechanisms as a form of payment to meet the amounts owed to external suppliers.

- There is a mechanism in place that guarantees the documentation and filing of all income received, as well as the issuance and/or approval of invoices.
- Knowledge through public document of the specific people who have been granted power to contract on behalf of the company.
- Limitation of corporate cards to the Commercial Department and the Management Secretariat.
- Verification procedure for anticipated expenses.

At **Haizea Wind Group** we strictly prohibit bribery and corruption of any kind related to the Group's professional activity. Individuals caught engaging in bribery or corruption will face disciplinary action up to and including dismissal, or may face financial penalties and criminal prosecution.

8.2.2. Contributions to foundations and non-profit entities

All our contributions and collaborations in social action are part of our business strategy and are based on responsibility with our environment and with the identity of **Haizea Wind Group**. We collaborate with foundations and non-profit entities that operate in environments related to childhood, health and food. Specifically, during the last few years we have carried out the following social action initiatives:

- In 2024, the Group made a financial donation of €10,000 through Caritas Diocesana to support those affected by the DANA. In addition, different plants of the group coordinated the collection and shipment of material to the affected areas.
- Collaboration with a special employment centre in the preparation of Christmas baskets delivered to employees in Haizea Bilbao. In 2025, this initiative has been recognised with the award given by the Urbegui foundry, in recognition of social work and the promotion of inclusion.
- Blood donation campaigns in Haizea Bilbao and Haizea Tecnoaranda.
- Collaboration with centres specialising in people with disabilities to promote their inclusion and offer specific training in the field of metallurgy.
- Haizea Tecnoaranda has collaborated with the organisation of the March against Cancer in Aranda de Duero.




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9. Information about the company

9.1. Commitment to sustainable development

At **Haizea Wind Group** we develop activities that contribute to the well-being and improvement of the communities in which we operate. We contribute to economic and social development through multiple initiatives and programmes. Below are the most significant ones for 2025:

- **Haizea Wind Group** participates in the 19th Employment and Entrepreneurship Forum of the University of Deusto and takes part in the presentations "Business Leaders in Environmental Technologies" and "Supporting Your Future" by Javier Martín Baniandrés, Commercial Director of the Towers Division of **Haizea Wind Group.**

- Haizea Bilbao participates in the Job Fair such as: Employment Fair of the Chamber of Commerce of Bilbao and Merkalan, Employment and Training Fair of Lanbide

- Management on behalf of Haizea Wind Group participates as a guest speaker at the APNABI conference to share good practices in the integration of disabled people into the labour market.

- Participation of Haizea Wind Group in Industria Erronka with the Biscayan Federation of Metal Companies, an initiative that seeks to present the professional opportunities offered by the different metal companies in Bizkaia.

- Haizea Grupo WEC was present in November 2023 at a conference organised by the Guipúzcoa Business Association (ADEGI), "New Cultures Gunea", which is defined as a meeting place between companies that work on the new business culture and young people who are studying the latest Vocational Training or University courses.

- Collaborations with universities and training centres to promote job creation, the development of professionals in the environment and dual training. In this sense, we collaborate with the Somorrostro Training Centre, with the University of Valladolid, with the University of Mondragón, with the University of Deusto, with the Public University of the Basque Country, with the University of Burgos and with Vocational Training centres from Burgos.

Likewise, this year the Sponsorship Policy has been approved, which aims to contribute to the welfare of society, allocating resources to community investment initiatives, sponsorship, or donations to non-profit foundations. This document sets out the principles and framework within which these initiatives can be developed.

- Sponsorships:
  - Batzarre Sports Association.
  - Zumaia Triatloia.
  - Itziar Trail.
  - Anima Deba.
  - Riber Aranda Football Club.
  - Zierbena Arraun Elkartea.
  - II International Congress on Sustainable Port.
  - 1st Blue Forum on a Sustainable Caribbean Sea.

- Associations:
  - European Wind Tower Association.
  - Wind Business Association.
  - Members of the Energy Cluster.
  - Associates and members of the council of the Biscayan Federation of Metal Companies.



- Association of Smelters of the Basque Country and Navarra.
- Álava Business Union.
- ADEGI.
- Armeria Eskola.
- AERCE.
- Offshore Wind Foundation Alliance.

Haizea Wind Group promotes quality employment by promoting each of the levers that are part of the talent attraction and retention process. From presence in specialised forums in recruitment and joint work with public institutions, to training and development, through its people development programs and performance evaluation.

Haizea Bilbao, through a collaboration agreement with the Somorrostro Training Centre, creates Soldarte at the end of 2022, a welding school managed by said training centre and developed at the company's facilities. The creation of this school pursues two main objectives:

- To set up a school in the field of welding in order to promote the integration into the labour market of of unemployed people, people in



active employment who are improving their employment and people in active employment who in need of requalification.

- To provide a solution to the hiring needs of companies in Bizkaia, for profiles related to different welding process technologies such as submerged arc, TIG or semi-automatic welding, as well as the handling and manipulation of heavy elements.

The recipients of this project are people belonging to groups with lower employability possibilities or with low presence in industrial processes, such as young people at risk of exclusion, women, people over 45 years of age, and people who are long-term unemployed. Soldarte began its activity at the beginning of 2023 and trained over 225 people that year. Soldarte is still in operation today and the training has been extended to continue preparing the students of the first promotion according to the needs and aptitudes of each profile.

In addition, internship students have joined Haizea Bilbao, as part of the Gazte On program of the Department of Employment, Social Inclusion and Equality of the Provincial Council of Bizkaia, as well as the foundry unit of Haizea Grupo WEC, through an IHOBE program (Public Society for Environmental Management of the Basque Government) for the development of the Product Footprint Calculation project.

As part of the initiatives aimed at the process of attracting and retaining STEM talent, during the 2025 financial year, collaboration agreements have been established with Euskoiker - Business Classrooms of the UPV/EHU, incorporating three engineering students from this university into the Haizea Bilbao staff for the development of a joint project within the framework of the Business Classrooms.

In a complementary way, Haizea Bilbao has started a collaboration with the University of Deusto through the RIEG programme - Global Innovation and Entrepreneurship Network, an initiative supported by the Provincial Council of Bizkaia and aimed at attracting international STEM talent. In this context, the company has taken on a person with a STEM profile in a dual internship programme.

In order to optimise and standardise the management of scholarships, the organisation has implemented a guide for scholarship holders, a guide for tutors, as well as specific reception and follow-up procedures.

In relation to promoting local employment, it is worth noting that 89% of all workers are local (91% in 2024).

9.2. Subcontracting and suppliers

At **Haizea Wind Group** we select suppliers who not only prove the desired combination of quality, commercial competitiveness and innovation, but also, more importantly, suppliers who do so in strict compliance with applicable laws and foster a positive, safe and ethical workplace. In this sense, in the general purchasing conditions we include aspects relating to respect for social and environmental issues.

In the case of Haizea Bilbao, in the general contracting conditions we require suppliers and subcontractors to comply with our general code of ethics and conduct.

At Haizea Tecnoaranda, although the majority of the suppliers we work with are imposed by the clients themselves, the Code of Ethics of third parties is shared with them, in parallel to the audits and approvals that the clients may conduct. Regarding environmental criteria, we have prepared



a certificate to be signed by our suppliers regarding the proper management of their waste and the non-use of a blacklist of chemical products. In addition, the security of information and intellectual property is appropriately managed by sending a confidentiality agreement. TecnoAranda uses 6 Conecta, an advanced Occupational Risk Prevention management software that constitutes a comprehensive preventive solution and a web application designed for networking.

This tool allows an agile, centralised and efficient management of the Coordination of Business Activities (CAE), also facilitating the exchange and control of documents between the subcontracted companies and TecnoAranda, guaranteeing regulatory compliance and the traceability of the information.



At Haizea Grupo WEC, a third-party Code of Ethics has been developed, which must be signed by all new suppliers who want to work with us. It has been included in the supplier evaluation and approval circuit and it is reviewed annually that all suppliers must have signed it.

In line with our search for having a two-way communication with our suppliers, at Haizea Grupo WEC we have a bi-annual survey procedure for suppliers, with the aim of seeking areas for improvement. Once the results have been analysed, meetings are held with the suppliers whose rating is lowest.

Supervision and audit systems

Each business of the Group has established supervision and audit systems for suppliers based on their needs and criticality.

At Haizea Bilbao, a supplier approval and homologation process is conducted in which quality, environmental and health and safety criteria are taken into account. There is a list of criticality of the products and, depending on the family to which they belong, the minimum criteria that must be met are specified.

In addition, at the end of a project, suppliers are evaluated from different points of view (commercial, logistics, quality, services) for the different areas involved in the project. Depending on the evaluation, a grade is weighted from 1 to 100. If the supplier is evaluated below 75, corrective/improvement actions are recommended.

In relation to Haizea Tecnoaranda, as we mentioned previously, it does not participate in conducting audits of suppliers directly, but rather they are conducted directly by the client itself.

9.3. Clients

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

Our products take into consideration all the safety parameters considered in the regulations applicable in each case and, in order to provide an acceptable level of protection for the people and goods that use or are in contact with our equipment. Every component we manufacture must meet the highest market standards, ensuring the trust and loyalty of our customers, allowing us to be a valued and sustainable group in our field.

All our production plants have procedures and quality control points throughout the entire production process, to ensure compliance with the highest standards. In addition, we carry out non-destructive tests and collect dimensional data and certificates that are delivered as documentation along with our product, such as quality dossiers for the client. To achieve this, we have both external and internal quality inspectors. As a result of our commitment to quality, it is worth highlighting that our plants (Haizea Bilbao, Haizea Tecnoaranda and Haizea Grupo WEC) have achieved ISO 9001 certification.



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

The great work of our teams has led us to achieve great milestones in recent years. approval for relevant projects and clients, among which the following stand out:

- Supply and manufacturing of over 70 transition parts for Baltic Power's offshore wind farm in the Polish Baltic Sea. Achieving an award as suppliers for the largest offshore wind farm in the world, with a total power of 3,600MW.

- Construction of 185 8MW wind turbine towers designed by Siemens Gamesa that will form the Yeu and Noirmoutier and Dieppe Le Tréport wind farms in France, to be built between 2024 and 2026. The project will be carried out in collaboration with SPIE Industrie, SPIE's French subsidiary, which will assemble the internal mechanical and electrical components used in some sections of the towers at its facilities in the port of Brest.

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

Tower Supplier Sustainability Award 2025, being recognised as the most sustainable tower supplier, a recognition awarded by Siemens that highlights the commitment of its entire supply chain and the organisation's continuous effort to promote responsible and sustainable practices in all its processes.



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Claims and complaints system

Client satisfaction is key for the Group, which is why we have a client satisfaction evaluation procedure in which we periodically provide satisfaction surveys. In those businesses where satisfaction surveys are not conducted, the salesperson in charge of that client prepares an assessment report. In addition, we have a KAM (Key Account Manager) figure per client, this person being in charge of managing all issues linked to that client.

Additionally, we have implemented a claims and complaints system in the Group adapted to the reality of each business.Incidents are received using any of the formal and informal means made available to the client and are managed and processed by our specialised staff. Our team analyses the reason for each incident individually and takes the appropriate measures to provide a solution to the client that meets the quality standards required at **Haizea Wind Group.**

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

In this regard, in those businesses where it is necessary due to the complexity or volume of

their operations, we have an incident registration tool that allows us to improve the quality of the service and take corrective actions to optimise its management. In all businesses complaints are periodically monitored, identifying at least the type of complaint, its status (resolved, in process, etc.) and closing date. To achieve this, businesses have non-conformity management procedures and preventive/corrective action management procedures.



9.4. Information security and cybersecurity management systems

The Group considers it essential to promote a culture of cybersecurity and privacy, ensuring that all employees have the necessary information and knowledge to minimise exposure to cybersecurity risks. It is worth mentioning in this regard that Haizea Bilbao and Haizea Tecnoaranda have obtained ISO 27001 certification, which sets out the requirements for the implementation, maintenance, and continuous improvement of an information security management system.

Haizea Bilbao's first ISO 27001 certificate has been officially validated in 2025 after successfully passing the audit carried out by AENOR. Under the supervision of the Chief Information Security Officer and the Chief Financial Officer, the first cybersecurity forums began to be held with the heads of information systems at each plant, and the Group continues to adapt its processes in the other companies in order to achieve these same objectives in the coming years. Thus, we have an

Internal Information System Policy, which aims to foster a culture of information both in those who make up the Group and in those who have commercial, contractual or professional relations with the companies that make up the Group. Finally, it should be noted that the Group has a series of specific procedures for the management of information security that are mandatory for all employees. Among them, there is an Internal Information Channel for use by employees, representatives or third parties who require it.

9.5. Tax 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. In order to comply with applicable legislation, as well as to carry out a responsible exercise with our stakeholders, we are governed by the following principles:

- Application and compliance with applicable tax regulations in all the territories in which we operate.
- Promotion of responsible fiscal action, which prevents fiscal risk through effective and transparent management.
- Maintenance of a relationship with the tax administrations based on the principles of good faith, collaboration and transparency.
- Awareness of the tax implications of all the decisions taken by the Board of Directors.

The Group's Economic Management is the executive department in charge of ensuring compliance with the fiscal policy, raising material issues to the Management Committee. The associated risks are treated monthly by the Group's tax team, relying on external advisors for the most relevant issues.

Economic results

As stated in the Consolidated Financial Statements of Haizea Investments, S.L. and its subsidiaries, the profit before tax for the year 2025 amounts to 21.5 million euros (14.8 million euros in 2024). In light of this outcome, the foreign pre-tax profit amounts to 3 million euros (2.5 million euros in 2024).

In relation to income tax, in the year 2025, as shown in the cash flow statement of the consolidated financial statements, a net income tax collection of 275 thousand euros (a payment of 2,910 thousand euros in 2024) has become apparent.

In addition, in fiscal year 2025 the Group has received subsidies from public organisations, 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	Observations
0. General information			
• 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	• 00 Letter from the President • 02 Business model • 03 Identification of key risks and opportunities	• The entities included in the consolidated financial statements (GRI 102-45) are included in the Annexes to the Consolidated Report at the end of the 2023 financial year, so no express mention is included in this document
• Policies applied by the group, which include the due diligence procedures applied for identification, evaluation, prevention and mitigation of significant risks and impacts, and verification and control, as well as the measures that have been adopted.	GRI 3-3	• 04 Materiality analysis • 5.1 Group Policies • 6.1 Group Policies • 7.1 Group Policies • 8.1 Group Policies • 09 information about the company	
• Main risks related to issues linked to the group's activities, including, where relevant and proportionate, its commercial relationships, products or services that may have a negative impact in those areas, and how the group manages these risks, explaining the procedures used to detect and evaluate them in accordance with the national, European or international reference frameworks for each subject. Information on the impacts that have been detected must be included, providing a breakdown of them, particularly on the main risks in the short, medium and long term.	GRI 2-12, GRI 3-3	• 04 Materiality analysis • 5.2 Key risks identified • 6.2 Key risks identified • 7.2 Key risks identified • 8.2 Key risks identified • 09 information about the company	
1. Information on environmental issues			
• Current and foreseeable impact of the company's activities on the environment and, where applicable, on health and safety	GRI 2-12, GRI 308-2	• 5.2 Key risks identified	

Contents of Law 11/2018 INF	Standard used (GRI)	Section	Observations
• *Environmental evaluation 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 activity-specific air pollution, including noise and light pollution	GRI 3-3	• 5.3.1 Climate change and other types of pollution	
• Prevention measures, recycling, reuse, other forms of recovery and waste disposal. 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 limitations	GRI 303-5[a]	• 5.3.3 Sustainable use of resources	
• Consumption of raw materials and the 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 energy	GRI 302-1	• 5.3.3 Sustainable use of resources	
• Greenhouse Gas Emissions and measures adopted to adapt to the consequences of Climate Change. Reduction goals voluntarily established in the medium and long term to reduce GHG emissions and means implemented to this end	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 employee-related matters			
• Total number and distribution of employees by sex, age, country and professional classification	GRI 2-6, GRI 2-7, GRI 405-1b	• 6.3.1 Employment	
• Total number and distribution of types of employment contracts	GRI 2-7	• 6.3.1 Employment	
• Annual average of permanent, temporary and part-time contracts by sex, age and professional classification	GRI 2-7	• 6.3.1 Employment	
• Number of layoffs by sex, age and professional classification	GRI 401-1b	• 6.3.1 Employment	
• Average salaries and their evolution disaggregated by sex, age and professional classification or equal value		• 6.3.1 Employment	
• Salary gap		• 6.3.1 Employment	
• Remuneration of the same or average jobs in the company		• 6.3.1 Employment	

Contents of Law 11/2018 INF	Standard used (GRI)	Section	Observations
• The average remuneration of directors and executives, including variable remuneration, allowances, compensation, payment to long-term savings pension systems and any other perception disaggregated by sex	GRI 401-1b	• 6.3.1 Employment	
• Implementation of measures of employees' right to digitally disconnect from work		• 6.3.1 Employment	
• Employees with disabilities		• 6.3.1 Employment	
• Organisation of working time	GRI 3-3	• 6.3.2 Work organisation	
• Number of hours of absenteeism	GRI 403-9[a]	• 6.3.2 Work organisation	
• Measures aimed at facilitating the enjoyment of work-life balance and promoting the co-responsible exercise of these by both parents	GRI 401-3	• 6.3.2 Work organisation	
• Health and safety conditions at work		• 6.3.3 Health and Safety	
• Work accidents and occupational diseases (frequency and severity) disaggregated by sex	403.9a-b Occupational injuries	• 6.3.3 Health and Safety	
• Mechanisms and procedures that the company has in place to promote the involvement of employees in the management of the company, in terms of information, consultation and participation	GRI 2-29	• 6.3.4 Social relations	
• Organisation of social dialogue, including procedures for informing, consulting and negotiating with staff	GRI 2-29, GRI 403-1, GRI 201-3	• 6.3.4 Social relations	
• Percentage of employees covered by collective bargaining agreement by country	GRI 2-30	• 6.3.4 Social relations	
• Balance of collective bargaining agreements, particularly in the field of health and safety at work		• 6.3.5 Training	
• Policies implemented in the field 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 persons with disabilities	GRI 3-3	• 6.3.6 Accessibility	
• Equality		• 6.3.7 Equality	
3. Information on respect for human rights			
• Application of due diligence procedures in human rights	GRI 3-3	• 7. Information on respect for human rights	
• Prevention of the risks of violation of human rights and, where appropriate, measures to mitigate, manage and repair possible abuses committed		• 7.3.1 Prevention of human rights risks and, where appropriate, measures to mitigate, manage and repair possible abuses committed	

Contents of Law 11/2018 INF	Standard used (GRI)	Section	Observations
• Complaints for cases of human rights violations	GRI 2-26, GRI 3-3, GRI 406-1, GRI 408-1, GRI 409-1	• 7.3.2 Complaints regarding cases of human rights violations	
• Promotion and compliance with the provisions of the fundamental ILO conventions related to respect for freedom of association and the right to collective bargaining	GRI 3-3	• 7.3.3. Promotion and compliance with the provisions of the fundamental ILO Conventions related to respect for freedom of association and the right to collective bargaining	
4. Information regarding anti-corruption and bribery matters			
• Measures taken to prevent corruption, bribery and the fight against money laundering	GRI 3-3	• 9.1 Commitment to sustainable development	
• Contributions to foundations and non-profit entities		• 9.2 Subcontracting and suppliers	
5. Information about the company			
• Impact of the company's activity on employment and local development and on local populations and the territory. Relationships maintained with the players of the local communities and the types of dialogue with them. Association or sponsorship actions	GRI 2-28	• 9.1 Commitment to sustainable development	
• Inclusion of social, gender equality and environmental issues in the purchasing policy and consideration of their social and environmental responsibility in relationships with suppliers and subcontractors	GRI 3-3	• 9.2 Subcontracting and suppliers	
• Supervision and audit systems of suppliers and subcontractors and their results		• 9.2 Subcontracting and suppliers	
• Measures for the health and safety of consumers		• 9.3. Clients	
• Complaint systems, complaints received and their resolution		• 9.3. Clients	
• Profits obtained by country	GRI 207-4b.vi	• 9.4 Tax information	
• Taxes on profits paid	GRI 207-1, GRI 207-4b.viii	• 9.4 Tax information	
• Public subsidies received	GRI 201-4	• 9.4 Tax information	

