noatum

Sustainability Report

One Brand, One Team, One Goal

2021

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Introduction

During 2021, which is the subject of this report, we have witnessed global changes and challenges that have also impacted our sector. Our ability to adapt and anticipate has enabled us to achieve a positive balance in such a complex year. We have improved the agility and efficiency of the services we offer, always remaining at our customers' side. All of this is thanks to the knowledge, commitment and experience of our teams and the progress we are making, including the digital transformation process in which we are immersed.

We are aware that everything we do has an impact on our environment. We have taken this reality as a responsibility and also as an opportunity to contribute to the development of society. We are firmly committed to constantly adapting to the demands of the global market in order to offer our customers a service of the highest excellence, while at the same time continuing to focus on the well-being and safety of people, respect for the environment and innovation in the solutions we offer.

As a multinational group, in 2021 we have consolidated our presence and influence in the logistics sector through the provision of maritime services, integrated logistics and port operations. The cross-cutting nature of these three business areas allows us to maximise synergies at global and local levels with a differentiated service in the market that adds value to our customers' logistics chain.

Thinking and acting globally, pluralistically and with integrity has undoubtedly made us better as a Group, more diverse and more committed. Our main competitive advantage lies in people. Placing them at the centre of our decisions has been a priority in this cycle that is now drawing to an end. In 2021 we have promoted a cultural change with the implementation of a series of projects that have enabled a substantial improvement in the employee journey and that will be our foundation for today and tomorrow, with special emphasis on health, safety and well-being, leadership, communication and training.

We want to make our mark in everything we do, while we continue to build a better future for everyone. We are working to ensure that our business processes and activities are developed, throughout their entire life cycle, from a sustainability approach, which is becoming a major challenge for our sector. We are committed to working and growing as a company in a responsible manner in the environment in which we operate. To make this possible, our ESG Committee drives environmental, social and governance objectives and actions within the Group. This Committee is currently working on the definition of a sustainability strategy that will focus, among other things, on a plan that will encompass decarbonisation, circular economy and environmental protection.
We have also made progress in transparency with the disclosure of our environmental footprint and have extended environmental requirements to our suppliers.

Noatum has prepared this report in order to provide information on the main advances in the field of sustainability and make ourselves accountable to our stakeholders. We hope that you will find sufficient and rigorous information throughout this document to enable you to form a solid and reliable opinion on the evolution of our performance, objectives and efforts to continue contributing to society.

2
FIGURES THAT BACK US

26
countries
(+5 partnership countries)

16
terminals

106
companies within the Group

+2300
employees

142
locations

Production figures

+16,300
managed ship calls

+457,000
logistical operations performed

+1,038
million tonnes managed

+13,032
million tonnes of bulk and general cargo handled in our terminals

+613,000
containers freight volumes (TEUs)

+594,000
containers handled at our terminals and depots

+835,000
vehicles at our *ro-ro* terminals

We are making progress in our commitment to society

Main social indicators 2021



41 YEARS
Average age of our workforce

91.32%
permanent contracts

6%
increase in workforce compared to 2020

ADVANCING IN CLOSING THE SALARY GAP

Our weighted salary gap is **4.66%**, a decrease of almost 4 percentage points from the previous year.

100%
OF THE WORKFORCE

in Spain, Portugal and France is covered by collective bargaining agreements

14,354
TRAINING HOURS

3% average increase in training hours compared to 2020

>112,700
EUROS

euros invested in social action

In 2021, the **number of *safety walks* has tripled**, partly due to the global implementation of all functionalities of the SmartOSH software tool.

In addition, there has been an increase in staff participation and consultation through the channels provided for this purpose.

Advancing our environmental commitment

119.10
Tonnes of CO_2 equivalent emitted in our corporate travels from Spain (Scope 3)

>77%
electrical energy consumed by Noatum sourced from renewable energy sources

19.8
less tonnes of hazardous waste at our terminals, representing a 32% decrease compared to 2020

Continuous improvement in environmental management

>537
tonnes of CO_2 equivalent eliminated in 2021,* associated with indirect emissions from the Group's electricity consumption (Scope 2) compared to 2020

7%
less paper consumed by Noatum Terminals compared to 2020

19%
less paper consumed in Noatum Maritime compared to 2020

* Figures obtained using the market-based method in Spain and location-based in the rest of countries.

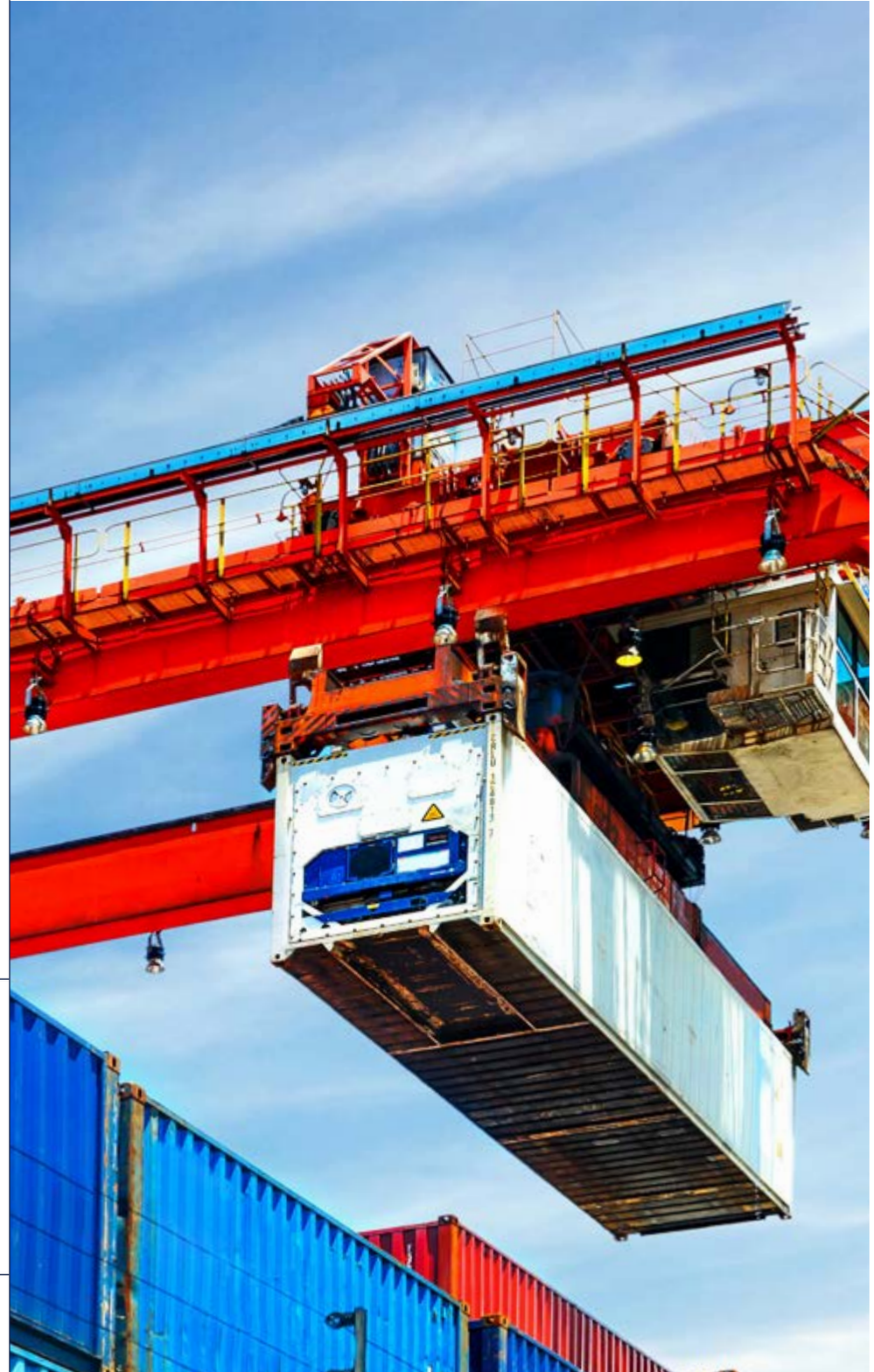


1 2 3 4 5

6 7 8 9 10



3
PROUD TO BE NOATUM



noatum

We are a multinational group offering maritime and logistics services and port operations, with more than 50 years of activity during which we have become renowned for the excellence of our service.

We offer comprehensive solutions to different industrial sectors through three business areas that meet their needs in an agile, flexible and global way, all with a local focus.

3.1. About Noatum

Our trajectory began in 1963 with the creation of the Marítima del Mediterráneo agency in Barcelona. However, the diversification of solutions and international expansion has been and remains a constant element ever since. We are currently developing our business on a global scale, with innovation and sustainability as the fundamental pillars in the development of our activity.

Noatum today

>2300
specialised professionals

142
locations

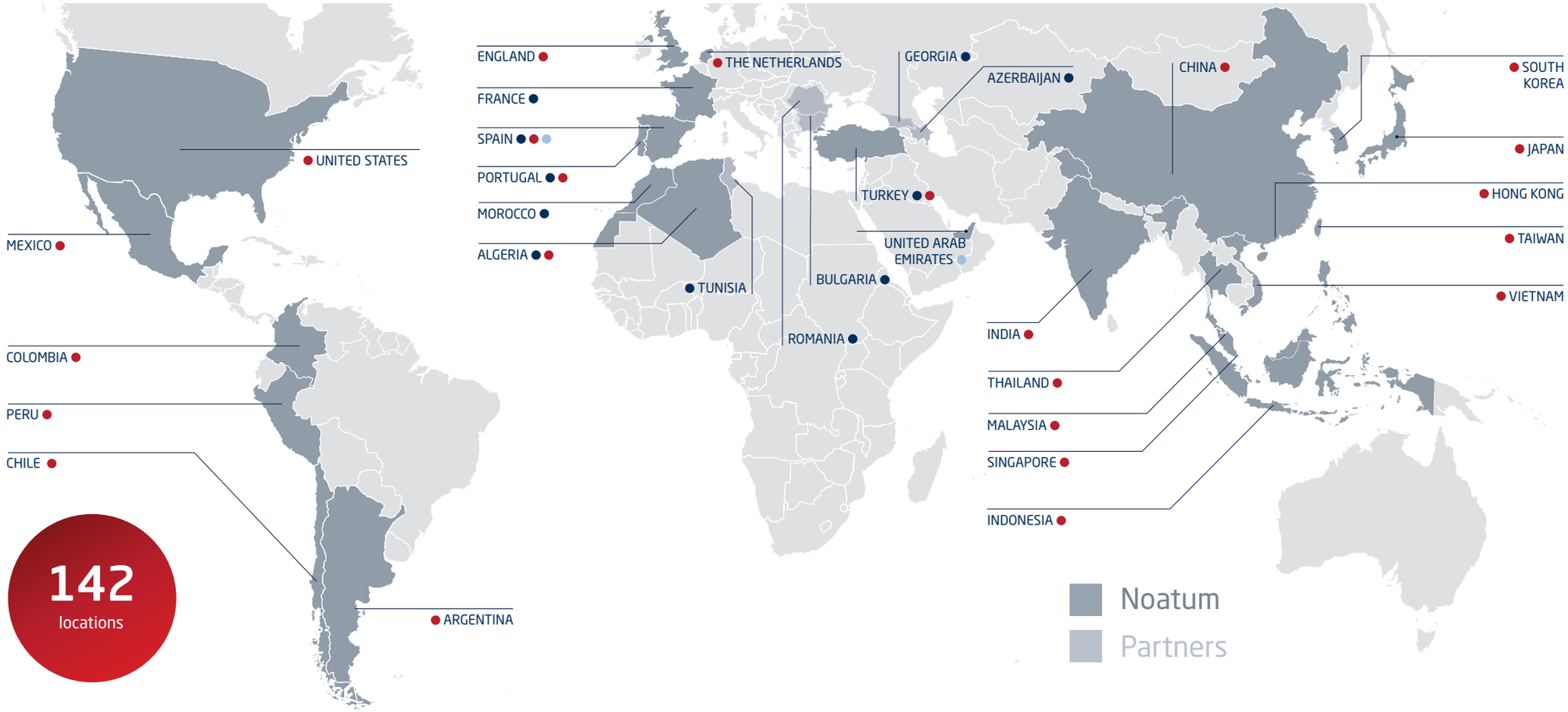
106
Group companies

26
countries
(+5 partnership countries)

We operate from
132
ports



Noatum in the world



noatum maritime

Tramp agency	Outsourcing	Oil & gas
Regular line	Liquid bulk	Maritime services
Reefer cargo	Land transport of containers	Cruise services
Liquid bulk	Automotive logistics	Consultancy

noatum logistics

SERVICES

Freight Management	Integral logistics / Storage and distribution	Global Trade Management / Customs Compliance

SOLUTIONS

Project cargo	International supply chain management (ISC)	e-Solutions
Reefer		

noatum terminals

Bulk terminals	Multi-purpose terminals	Container terminals
Refrigerated terminals	Ro-ro terminals	Depots

3.2. Mission, vision and values

Our very name, Noatum, is in itself a statement of intent. It has its origins in Nordic mythology: *nóatún*, which, translated directly from old Norse, means 'ship-city' or 'city of ships'.

This meaning is embodied in our mission, vision and, above all, our values. In our daily activities we make every effort to ensure that they are always present.

We work every day to ensure that our actions always reflect our brand and our values.

Mission

Providing top quality maritime, integrated logistics and port operations services, reputed for our continuous improvement and in a safe working environment to be the first choice of our customers.

Vision

Being a leading international company, renowned for the talent of our professionals and for our operational excellence in maritime services, logistics services and port operations.

Values

CARE

We care for our employees, customers, suppliers, partners and communities to help them reach their full potential, building strong long-term relationships for the benefit of all.

CONTINUOUS IMPROVEMENT

We always strive to progress and will develop creative solutions and innovations in order to improve our business and the service we provide to our customers.

CUSTOMER SUCCESS

To ensure the success of all our customers we are committed to delivering a first class, competitive and efficient service.

INTEGRITY

As a company we are committed to working with integrity, respect and fairness in everything we do.

EXCELLENCE

We always aim to deliver on what we promise with professionalism and excellence.

TEAMWORK

Teamwork is one of the key drivers to our success and demands strong relationships both internally and in working with our customers.

noatum

NAME:
ITS ORIGIN

NÓATÚN:
city of ships, the location of the
castle of Njöror, Nordic god, ruler of the sea, wind, fire,
wealth and prosperity

SYMBOL:
HOW IT IS BUILT

- The three gear-shaped parts symbolise the logistics process.
- The lower part of the symbol reflects the keel of a ship.

COLOUR SCHEME
MEANING

BLUE:
professionalism

RED:
humanity

3.3.
We are Noatum

With the vision and values of our company as our compass guide, we deploy our mission with the help of these three pillars:



One brand

We are a leading multinational group **in maritime, logistics and port services** with more than 50 years' experience.



One team

We are a **multicultural team made up by more than 2,300 people** around the world committed to providing a competitive and efficient service.



One goal

In our endeavour to help our customers successfully complete their projects, we focus our efforts on providing **cross-cutting, specialised and innovative** solutions.



3.4. Business model



Business areas

Our activity is currently structured into three main business areas:

noatum maritime

Providing shipping agency services for maritime transport and, in particular, regular line, tramp, outsourcing and ship services, as well as cargo services, including liquid bulk, break bulk, refrigerated cargo and dry cargo.

noatum logistics

As a global logistics operator working within its customers' supply chains. Specialising in integrated transport management, project cargo, international supply chain management (ISC), customs, integrated logistics and e-Solutions for e-commerce.

noatum terminals

Port facilities that are able to meet the logistics needs of each port's industrial hinterland. We offer a highly professional management backed by the most technologically advanced resources, as well as a blend of global knowledge and local experience to ensure excellent service.



noatum

BUSINESS AREAS

- noatum maritime
- noatum logistics
- noatum terminals

SPECIALISED DIVISIONS

- noatum automotive & ro-ro
- noatum industrial solutions
- noatum project cargo
- noatum port logistics

COMPREHENSIVE SOLUTIONS

- noatum oil & gas
- marmedsa cruise services
  NOATUM MARITIME
- noatum chartering
- noatum reefer

noatum maritime

Brands we operate with

marmedsa
NOATUM MARITIME

universal marítima
NOATUM MARITIME

marmedsa logística
NOATUM MARITIME

marforwd
NOATUM MARITIME

marmedsa bemarine
NOATUM SHIPPING AGENCY & LOGISTICS

lematrans
AGENCIA DE TRANSPORTES

MARITIMACONSIFLET

ERHARDT MEDITERRANEO

CROSS STAFF
STAY UNIQUE, STAY TOGETHER

Services

We are **focused on meeting the needs of all our customers**, from ship attendance to commercial representation, including specialised transportation solutions, oil&gas, charters, etc.

We also provide ancillary services for the transport of containers and freight by road, as well as storage and distribution services.

Shipping agency services for maritime transport:

- Regular line services
- Tramp
- Outsourcing
- Ancillary services
- Cargo services, including bulk liquids, break bulk, refrigerated cargo and dry cargo.



noatum maritime

Activities

- Regular line
- Tramp agency
- Reefer cargo
- Outsourcing
- Liquid bulk
- Dry cargo chartering
- Ship services
- Inland transport of containers
- Consultancy
- Oil & gas
- Cruises
- Automotive logistics

Countries where we operate

Spain, Portugal, France, Morocco and Algeria.
Partnership countries: Tunisia, Turkey, Georgia, Azerbaijan, Romania and Bulgaria.

+500
EMPLOYEES

PRESENCE IN
70
PORTS



Key figures in 2021

+16,300
SHIP CALLS

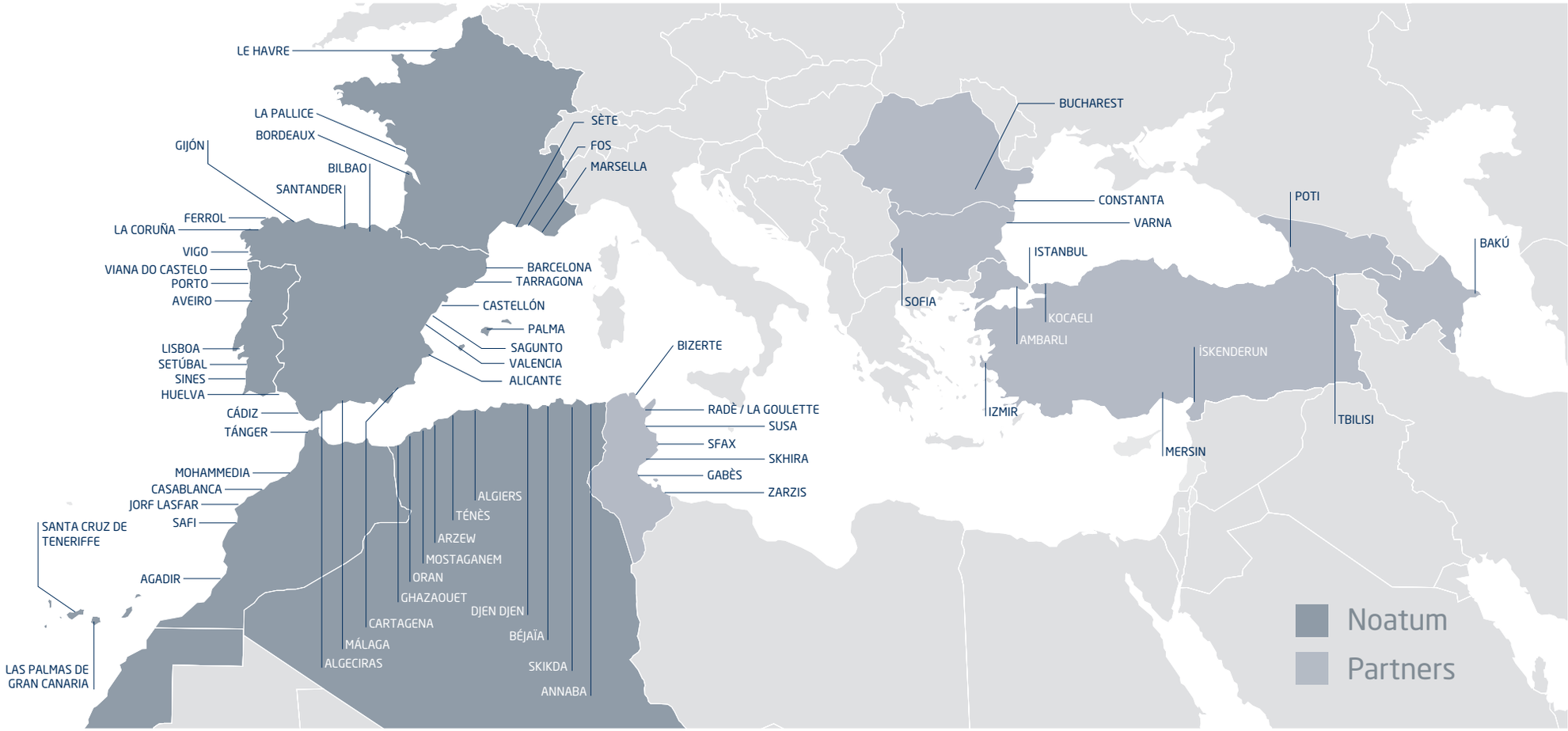
229,000
TEU* (EX/IM)

338,000
TONNES

61,600
MARITIME SERVICES

More information about Noatum Maritime **here**

* TEU: twenty-foot equivalent unit, a unit of measurement of freight capacity equivalent to a standard 20-foot container.



noatum maritime

5 COUNTRIES

6 PARTNERSHIP COUNTRIES

70 PRESENCE IN PORTS

+560 EMPLOYEES

Noatum Maritime offices

SPAIN
22 offices
387 employees

PORTUGAL
6 offices
65 employees

FRANCE
6 offices
41 employees

MOROCCO
6 offices
38 employees

ALGERIA
10 offices
54 employees

Offices in partnership countries

TUNISIA
8 offices

TURKEY
6 offices

GEORGIA
1 office

AZERBAIJAN
1 office

ROMANIA
2 offices

BULGARIA
2 offices

noatum logistics

Brands we operate with

noatum logistics

noatum project cargo

ATLAS Mediterráneo

ATLAS FORWARDING

C. Steinweg Iberia, S.L.

A **global logistics operator that provides specific and value-added solutions to the supply chain** of all its customers.

SERVICES

Freight Management

Integral logistics / Storage and distribution

Global Trade Management / Customs Compliance

SOLUTIONS

Project cargo

International supply chain management (ISC)

e-Solutions

Reefer



noatum logistics

More information about Noatum Logistics **here**

Industrial sectors

- Automotive
- Mining
- Oil & gas
- Renewable energy
- Construction
- Manufacturing industry
- Railway projects
- Chemical industry
- Pharmacy and health care
- Fashion
- Retail
- Consumer electronics
- Food and beverages
- Furniture

Areas of operation

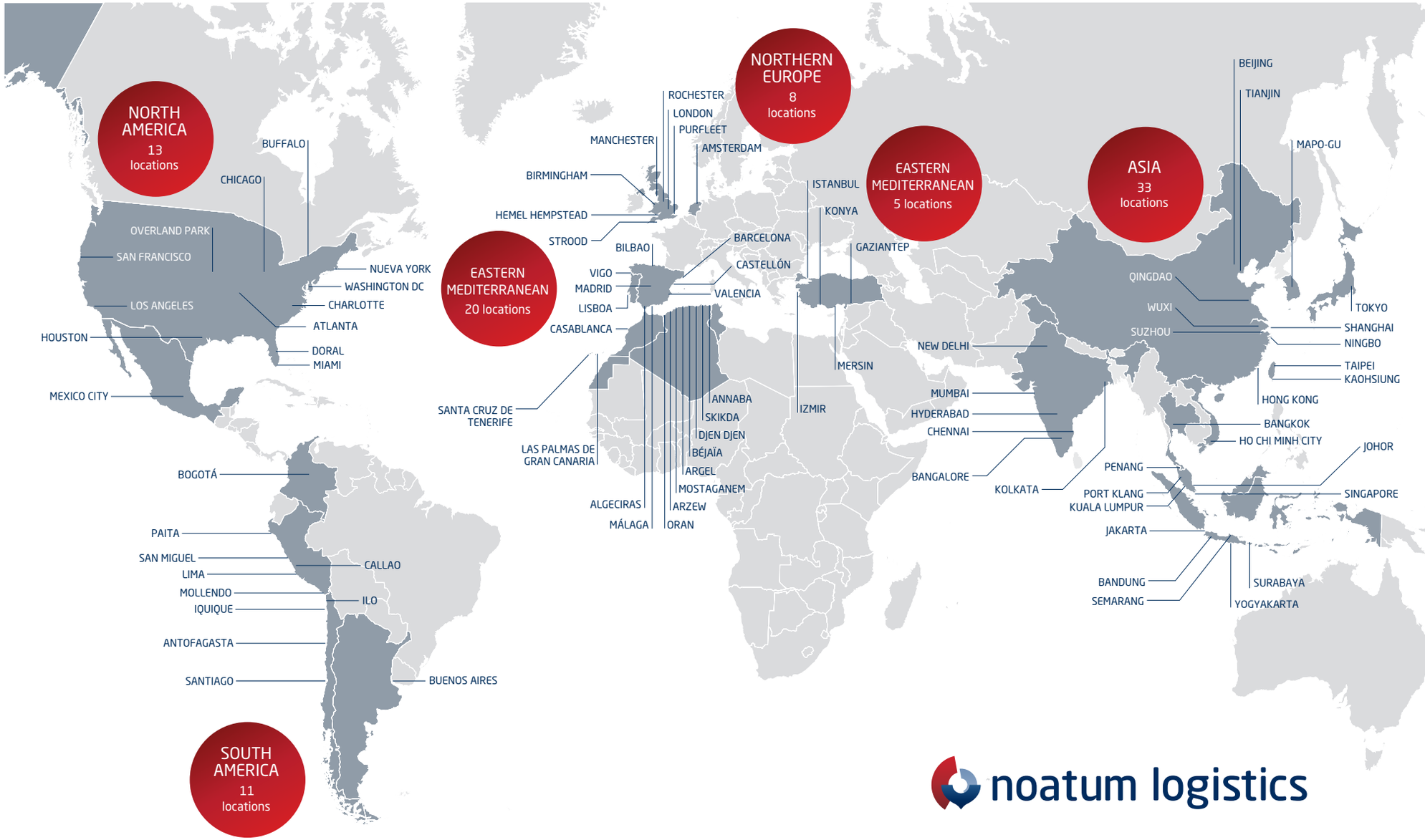
North America, South America, Northern Europe, Western Mediterranean, Eastern Mediterranean and Asia.



Key figures in 2021

42,000 AIRFREIGHT TONNES	497,000 SEAFREIGHT TONNES
384,000 TEUS (EX/IM)	457,000 LOGISTICS OPERATIONS
283,000 CBM LCL*	143,000 CUSTOMS CLEARANCES
161,000 LANDFREIGHT TONNES	175,000 m^2 OF WAREHOUSES

* CBM LCL: cubic metres in minor load of a container.



noatum logistics

24	90	24	+1,700
COUNTRIES	OFFICES	WAREHOUSES	EMPLOYEES

noatum terminals

Brands we operate with

noatum terminal CASTELLÓN

noatum terminal MÁLAGA

noatum terminal SAGUNTO

fricasa NOATUM REEFER TERMINAL CASTELLÓN

noatum terminal SANTANDER

noatum terminal TARRAGONA

ALGEPOSA ASTURIAS

ALGEPOSA HUELVA

G&T PORT CASTELLÓN

PROGECO VIGO

PROGECO BILBAO

progeco BARCELONA

leatransa

S.L.P. BILBAO

Terminal Marítima de Cartagena

TMGA A CORUÑA - FERROL

VIGO FRESH PORT

Services

Port facilities designed to meet the logistics needs of each port's industrial hinterland.

We offer a **highly professional management** backed by the most technologically advanced resources, as well as a blend of global knowledge and local experience to meet every need.



noatum terminals

Solutions

- Multi-purpose terminals
- Container terminals
- Bulk terminals
- Ro-ro terminals
- Reefer terminals
- Container depot and repair
- Storage

Countries where we operate

Spain and the United Arab Emirates

16 TERMINALS

5 DEPOTS

+180 EMPLOYEES



Key figures in 2021

353,000	241,000	15,500	13,032,000	835,000
CONTAINERS MOVED IN DEPOT	CONTAINERS	PALLETS (*REEFER*)	TONNES OF BULK AND GENERAL CARGO	*RO-RO*

More information about Noatum Terminals **here**



noatum terminals

BULK TERMINALS

MULTI-PURPOSE TERMINALS

CONTAINER TERMINALS

REFRIGERATED TERMINALS

RO-RO TERMINALS

DEPOTS

2	16	5	+180
COUNTRIES	TERMINALS	DEPOTS	EMPLOYEES



Solutions

SPECIALISED DIVISIONS

The **synergies created by the interaction of these three business areas** and the extreme diversity of their activities mean that we can provide our customers with a unique experience, with **products and solutions tailored to the complexity of their business: herein lies our strength and our consolidation as market leaders**. Thanks to the global vision of the sector provided by these business areas, we have created sectoral products backed by a comprehensive service.

noatum automotive & ro-ro

Offering a complete global service for Noatum's automotive and *ro-ro*business. Utilising the high level of expertise and synergies of the Group's various business areas and units.

noatum port logistics

Providing tailor-made solutions that meet the needs of our customers with a single management partner. Offering our customers specific solutions for all their logistics and transport needs on a global scale.

noatum project cargo

Specialising in project cargo, we offer comprehensive support for high-volume projects. Dealing with all engineering, planning and supervision services.

COMPREHENSIVE SOLUTIONS

Operational, transport and logistics solutions adapted to the specific needs and characteristics of each industrial sector:

marmedsa cruise services
NOATUM MARITIME

This division is focused on providing specific services to ships in the cruise industry.

noatum chartering

It is our end-to-end solution for specialised dry cargo shipping chartering.

noatum oil & gas

Providing a reliable service to the customer through an infrastructure capable of responding to the industry's complexities.

noatum reefer

This division of the Noatum Group specialises in temperature-controlled cargo. Offering customised and value-added solutions to the entire logistics chain.

3.4. Global trends for a global company

Being a global company means facing potential barriers, but also opportunities for our development, as we are more exposed to the political, economic, technological or environmental trends in the world.



GLOBAL TRENDS THAT HAVE AFFECTED OUR BUSINESS IN 2021

POLITICAL AND ECONOMIC CONTEXT

Apart from recent commotions, starting with Covid-19, **the global economy faced increasing structural challenges in 2021**:

- The room for manoeuvre offered by **traditional economic** policies has diminished. For their part, **fiscal policies** in the **larger economies** were constrained as a result of existing **overindebtedness**. Due to the prevailing exposure, monetary policy options also declined.

- Growth fell by **4.2%** in 2020 before recovering rapidly to **5.2%** in 2021 and stabilising at around **4.0%** in 2022. However, scenario analysis shows that such a recovery is far from guaranteed.

- **Cyber-attacks** and the **geopolitical situation** may eventually influence some operations.

- The **grounding of the *Ever Given* cargo vessel** in the Suez Canal caused an unprecedented bottleneck, resulting in delays that affected the supply chain for many months.

- The spread of Covid-19 and the level of international cooperation in response to it shaped the **global economic trajectory:** multiple quarantines and the prolonged closure of numerous ports and airports, which only worsened existing logistical congestion.

DEMOGRAPHIC ANALYSIS AND MARKET TRENDS

- As the global trading system continued to face headwinds and an uncertain future, companies were forced to **recalibrate** their **global footprint** accordingly. Executives were to **identify markets** that are open to **integration** and capitalise on investment and sales opportunities in those markets in the short term.

- The implementation of new trade agreements, such as the UK's **post-Brexit new trade agreements**, influenced the extent of cross-border flows of people, goods and services.

TECHNOLOGICAL FRAMEWORK

- As technological advances accelerated in the midst of Covid-19, businesses found themselves under pressure to prepare for a digital future. Businesses cannot be passive observers of the ongoing digital revolution and must anticipate the changes of a strategic, cross-cutting digital transformation.

- Levels of R&D investment and developments in **technological competition between the US and China** influenced the development of technological innovation.

- The **microchip crisis** has hit the automotive industry hard, causing numerous factory closures and slowing vehicle production due to lack of parts.





ENVIRONMENTAL FRAMEWORK

- Major **climate events**, such as floods, fires and droughts, raised public awareness and supported new sustainability policies and international agreements to address climate change.

- Companies should be proactive in addressing unforeseen and uncertain risks in the areas where they operate, from Covid-19 outbreaks to **extreme weather events**. In this regard, they should take practical steps (such as developing **disaster mitigation strategies**, establishing rapid response plans, improving the **sustainability of operations**) to increase agility, reduce risk and improve business efficiency.

- The **international trend towards regulation on the management of environmental, social and governance (ESG) criteria** promoted actions to ensure compliance with sustainability in all types of organisations. It is worth noting that in **2021 the new Climate Change and Energy Transition Act was passed**, which obliges companies to report on their climate change risks and opportunities.

- **Sustainable and responsible investment** is progressively becoming an increasingly relevant concept in the field of finance. We are experiencing a continuous **growth in assets under management by national entities**, which translates into an exponential increase in economic policies that include ESG criteria, such as those stemming from the taxonomic regulation of the European Union or the European Green Pact.

3.5. Strategic priorities: cross-cutting efficiency and sustainable growth

Our international vocation has allowed us to have a significant impact in the maritime, logistics and port sectors, which is our ecosystem. Building on the experience gained in these three areas, our aim is to exploit the synergies between our business units worldwide to create a differentiated service in the market that will enable us to offer added value to our customers' logistics chain.



STRATEGIC PRIORITIES AND MANAGEMENT PHILOSOPHY

DIGITAL TRANSFORMATION

We embarked on a major digital transformation project that has had a cross-cutting impact on all business areas.

We work alongside our customers to adapt our technological solutions to their needs.

EFFICIENCY

We increase efficiency across all processes in which we are involved in a cross-cutting and sustainable manner.

GLOBAL SERVICES WITH A LOCAL FOCUS

We are focused on providing global services with a local approach in accordance with the needs and expectations of our customers. We offer value-added products and solutions thanks to the global vision provided by our three business areas.

THE CUSTOMER AT THE CENTRE

We place the customer at the centre of our activity. We know our customers, we analyse their needs and offer them the best suited solution.

CROSS-CUTTING PRODUCTS

The synergies created through the interaction of our three business areas and the extreme diversity of their activities enable us to provide our customers with products and solutions tailored to the complexity of their individual businesses.

Noatum corporate culture: integrating the ESG approach

Our strategic vision in the development of Noatum's activity is to integrate a cross-cutting ESG (environmental, social and good governance) approach in all our operations and business areas. To this end, we are currently working on both strategy and corporate culture to progressively adopt **voluntary commitments to the social, environmental and economic improvement of our context**.

BY INTEGRATING AN ESG APPROACH IN OUR COMPANY, WE ENSURE:



Below are the Group's current lines of work in relation to ESG actions.

E (ENVIRONMENTAL)

Actions related to our influence on the environment and our ability to mitigate the risks associated with our business.

Lines of work:
CARING FOR THE ENVIRONMENT

S (SOCIAL)

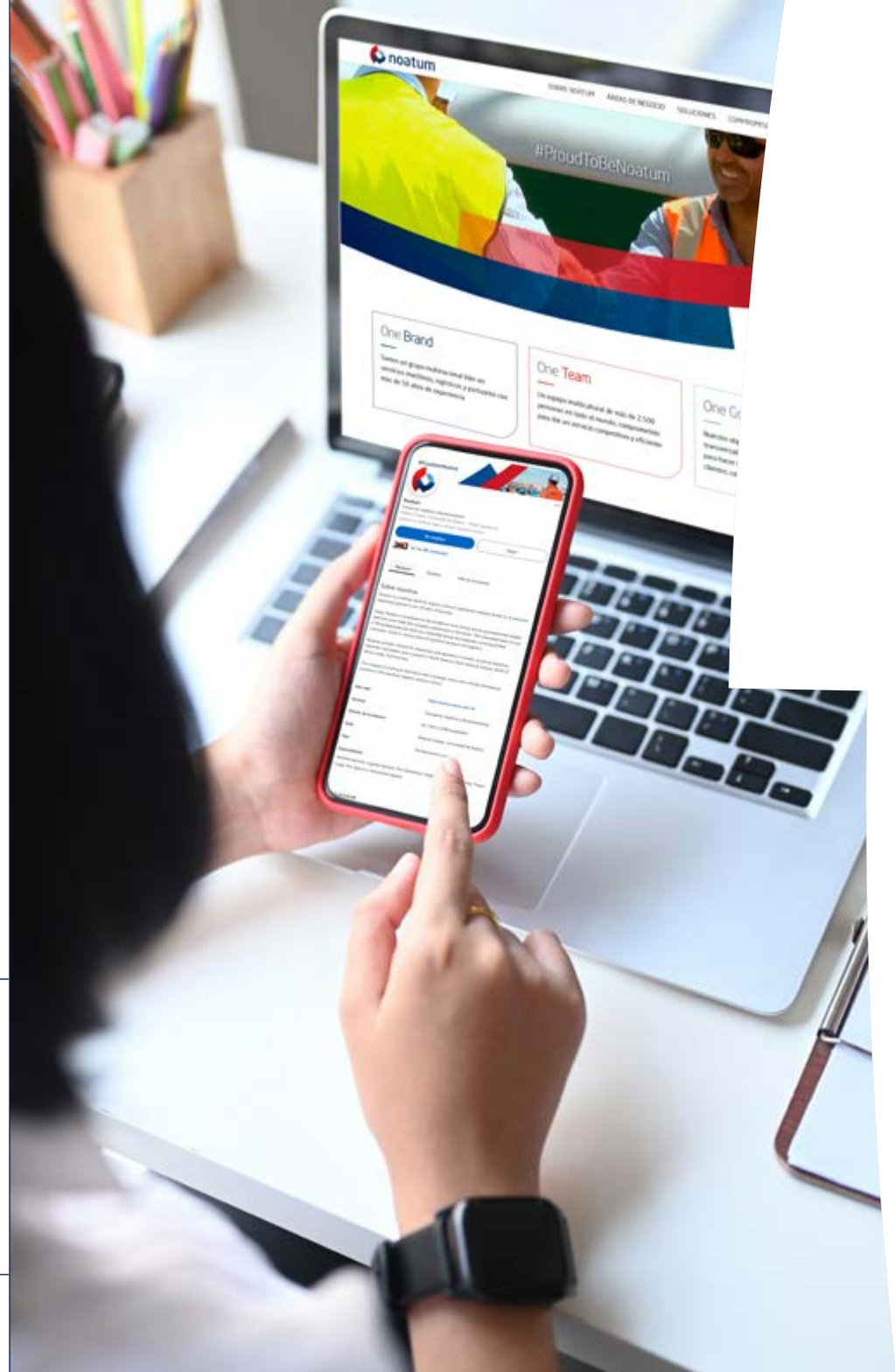
Actions focused on our relationships with other companies, communities and our own employees.

Lines of work:
A SPECIALISED TEAM

G (GOOD GOVERNANCE)

Actions linked to the acquisition of commitments to good governance, ethical behaviour and transparency on our part.

Lines of work:
NOATUM'S CORPORATE GOVERNANCE



3.6.
Our stakeholders, requirements and management channels

Noatum strives to **constantly listening to its stakeholders** with the aim of understanding their expectations and anticipate their needs. We work closely with them to **develop initiatives that contribute to meeting their needs and expectations**. Communication and interaction with our various stakeholders is therefore essential to **ensure the success of our operations**. We take their feedback into consideration as a tool for **continuous improvement** in the delivery of our services.

With this same philosophy of creating shared and transparent value, a necessary element for establishing **productive, trusting and lasting relationships**, we make the most relevant non-financial information available to our stakeholders and to society in general, both in these reports and on our website and social media.

These are our key stakeholders, who are those who are directly or indirectly affected by our business or whose decisions may influence our business and, consequently, the way we do business.

External stakeholders:

- Suppliers
- Customers
- Society and community
- Public administrations and institutions
- Competition
- Trade unions
- Associations and organisations

Internal stakeholders:

- Shareholders
- Corporate management
- Business areas
- Operational head offices
- Corporate areas
- Employees
- Families of employees
- Workers' representatives
- Health and Safety Committee



Within the framework of our Integrated Management System, we analyse the needs, expectations and requirements of our stakeholders and identify the management system process that responds to this requirement, as well as the corresponding specific resource.

Our management processes respond to stakeholder expectations and for this we have different channels and specific resources.

4
DIFFERENTIATING OURSELVES: INNOVATION AT THE SERVICE OF THE CUSTOMER

4.1.
The customer at the centre

Active listening is essential to better know our customers, their demands and the expectations they place on Noatum as a partner or supplier to develop their business activity. That is why we spend a significant amount of our time listening to our customers to better understand their needs. Thanks to this active listening process, we provide **innovative solutions at key moments in their supply chain**, such as the combination of routes and means of transport, the use of interim warehouses or the use of our own containers to make up for the shipping liners' lack of equipment.

We therefore work very closely with them to jointly find the best solution at all times.



Our main asset is our customers, whom we place at the centre of our activity. Noatum's differential value is the **constant search for excellence:** we analyse their specific needs in order to offer them the best suited solution for their logistics requirements, on a global and local scale.

2021 was a year that put our management capacity and our solutions to the test: we faced a context of global supply chain issues that strained the market, exacerbated by the Covid-19 pandemic. In this situation, **our extensive experience and multiple assets in the logistics field allowed us to be proactive and anticipate crisis situations in order to mitigate them in time,** a proactivity for which our customers thanked us. In this respect, the technification of our processes, for example, allowed for a more efficient control of our manoeuvring capacity and the spaces available for sea and air transport.

> We are immersed in a digital transformation process that allows us to optimise our resources and improve the efficiency of our processes, with the aim of offering the best solution amidst a highly complex environment.



Highly specialised professionals

The specialisation of our teams is another of our pillars to be closer to our customers, to build long-term relationships based on mutual trust and to fully meet their business objectives.

We have teams specialised in *p*roject cargo, reefer, chartering services, e-fulfilment and last mile delivery, among others, and we will continue working to be even more proactive and efficient. One of our objectives is to strengthen the connection between our teams to increase synergies and cross-cutting solutions within Noatum. We want flexibility and adaptability to remain part of our value-added proposition.



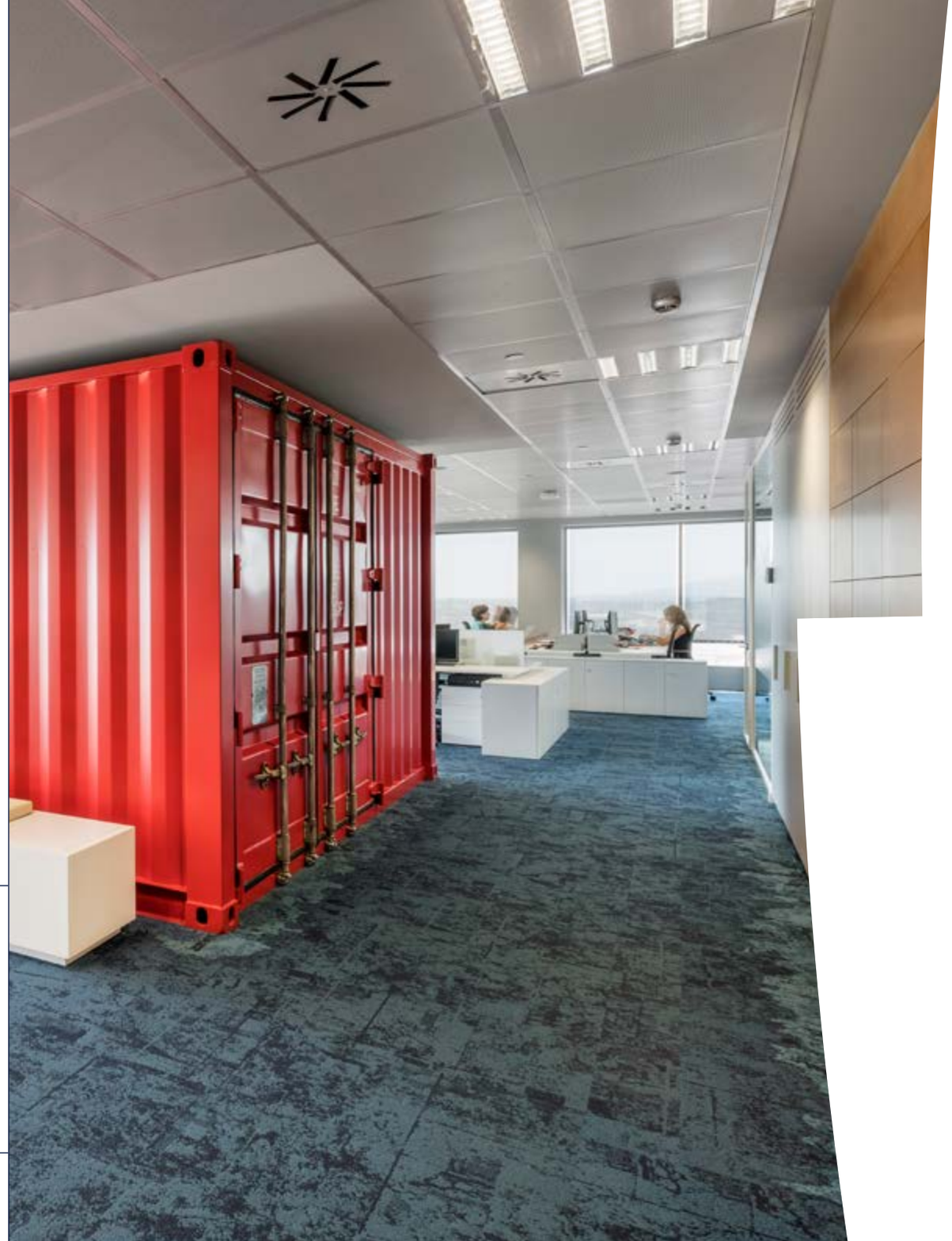
4.2. Innovation and efficiency in our work processes

The pursuit of excellence, continuous improvement and innovation are an essential and distinctive part of Noatum. Our strategic approach also focuses on sustainable innovation, understood as the best way to transform and develop products and solutions that have a positive impact, not only for our customers and suppliers, but for society as a whole. With this philosophy in mind, we incorporate technology in all our activities, always from the perspective of sustainable and integral innovation, as we involve all the relevant actors by actively listening to their needs.

Innovation, as well as being used for the development of new solutions, is a fundamental part of the optimisation and efficiency of our work processes. Noatum understands **efficiency as the simplification and dedication of efforts to what really adds value and differentiates us**.

That is why we work to be **an efficient organisation:**

- We make decisions in an agile way.
- We execute these decisions quickly and effectively.
- We are flexible and continuously adapting to a global context of uncertainty and constant change.
- We optimise our processes in a cross-cutting manner, applying innovation in all our business areas and in all our products and solutions.



4.3. Integrated management system

In the same way that the services and solutions we offer are built in an integral way to optimise and detect needs in a cross-cutting manner, we have also opted for this philosophy in our internal management. To this end, we have an Integrated Management System, implemented within different companies of the Group[1], which guarantees an **effective and efficient management model**. This system adapts to the growth and changes demanded by the market, our stakeholders and our organisation itself.

The leadership and commitment of the management in incorporating the Integrated Management System into the business strategy guarantee good governance practices under this approach, as well as the allocation of the necessary means and resources for its deployment and maintenance. Training and awareness actions have been put in place to ensure that this management system is applied in all our processes and is understood and taken on board by all staff. Proof of this is that a course on the Integrated Management System was planned for 2021 and will be launched in 2022 through the Corporate University. This training action has been designed for all Noatum staff and aims to ensure that the management system is understood and embraced by all employees, emphasising the responsibility of each employee to maintain and improve the system through the performance of their job.

[1] Companies with environmental certification can be found in Appendix 3.1.

Our Integrated Management System undergoes different **review processes** on a regular basis, in which different teams, both external and internal, are involved and collaborate, including the management team when necessary. Thus, we can establish, if necessary, **action plans** that are integrated into the processes themselves, we manage potential deviations and we incorporate **continuous improvement** as a space for growth and detection of business and development opportunities.

Integrated Management System [2]



[2] Although the ISO 9001, ISO 14001, ISO 45001 are the reference certifications for the implementation of an Integrated Management System, not all Group companies are certified under all three standards.

In addition, some of the Group's companies have the following certificates, which ensure the quality and excellence of our services:

- AEO on customs simplification and security
- Customs Trade Partnership Against Terrorism
- CODEX Alimentarius
- Legal Compliance (TRACE)
- State Ports Quality Standards
- Marca de Garantía (Valencia)
- Business Alliance for Secure Commerce
- Efficiency Network (Barcelona)
- Good Manufacturing Practices (GMP+)

Incident measurement, control and management

Measuring and controlling our processes through different performance indicators and other monitoring tools allows us to **optimise the resources we allocated to achieve our objectives**.

With regard to the projects we manage, **we are committed to responding to our customers in relation to any incidents or deviations that may arise** in the management and day-to-day operations, regardless of their origin.

Analysing the cause in order to establish actions that provide an optimal, agile and decisive solution to any situation allows us to manage our services in a comprehensive and reliable manner, as well as to maintain the loyalty of our customers. Communication, collaboration and coordination with all stakeholders is fundamental to our management.

In 2021, the number of incidents recorded at Noatum Maritime was 58, down from 70 in 2020. For Noatum Logistics, the number of incidents recorded was 722, compared to 351 in 2020. In the case of Noatum Terminals[3], 113 incidents have been recorded, 8% less than in 2020 (123).

In terms of management, in 2021, all service incidents recorded have been managed, as they have all been responded to with immediate or remedial action. 66.97% were closed in this financial year. The remaining ones will be closed in the course of 2022, as it has been necessary to analyse the cause, assess possible implementable actions, implement a corrective action to correct the deviation, subsequently evaluate their effectiveness and close them in the relevant system. This whole process requires the investment of time and resources.



[3] With regard to the incidents of Noatum Terminals, all the terminals of the Group are included except for the Group's Less-Than-Load and Lashing facilities, located in Castellón, as it uses its own incident register, different from the one used by the Group.

We also have other processes for detecting incidents and non-compliances in which operational control and our own processes for resolving incidents and complaints are reviewed. These processes are as follows:

- **Periodic internal service inspections** and periodic inspections of equipment and machinery.

- **Internal and external audits** of the following types:

  - **Financial**.

  - **Integrated Management System** (quality, environment and occupational health and safety).

  - **Those relating to certifications and/or schemes**, carried out by independent third parties, mainly, State Ports Quality Standards, Good Environmental Practices Guide, EMAS, Authorised Economic Operator, GMP+ and HACCP/Food Codex for the management of food products, Good Distribution Practices (GDP) for the management of pharmaceutical products, SQAS (Safety & Quality Assessment for Sustainability) for the management of chemical products, among others.

The Integrated Management System includes the implementation of process improvement actions. It therefore incorporates new measures in operational, support and strategic processes, as well as implementing new processes to address risk management and other requirements of our internal and external stakeholders.

In the area of safety, health and well-being, this implementation of complementary actions involves sharing knowledge and information on incidents and lessons learned with both stakeholders and interest groups. Based on the information gathered through the Group's incident reporting software, and after analysing the causes of incidents, Noatum develops corrective measures and shares best practices to promote a preventive culture both internally and externally.

Through all these processes, we ensure continuous improvement and customer and stakeholder satisfaction.

With regard to information security, and privacy and data protection, the Noatum Group, in carrying out its activities, complies with Organic Law 3/2018, of 5 December, on the protection of personal data and guarantee of digital rights, and with Regulation (EU) 2016/679, of 27 April 2016, on the protection of private individuals with regard to the processing of personal data and on the free movement of such data.

It should also be noted that the Noatum Group has not received any complaints in 2021 relating to breaches of privacy or loss of customer data from customers or third parties.

5
NOATUM'S CORPORATE GOVERNANCE

5.1. Governance structure

Our governance and management bodies promote a **high level of excellence** in the fulfilment of our commitments to **continuous improvement**, gaining and maintaining the trust of our stakeholders, and best practices in corporate governance, ensuring **transparency, efficiency and rigour**.



Our management team is made up by:



ANTONIO CAMPOY
CEO Noatum



BONIFACE BERTHELOT
Corporate Managing Director & CFO Noatum



OSCAR RODRÍGUEZ
Chief Commercial Officer Noatum



JAVIER ALONSO
Chief Transformation Officer



JORDI TRIUS
Managing Director Noatum Maritime



RAFAEL TORRES
CEO Noatum Logistics



JOAQUÍN RAMÓN
Managing Director Noatum Terminals



XAVIER VAZQUEZ
CEO Noatum Automotive & Ro-Ro



DANIEL BERASATEGUI
CEO Noatum Project Cargo

Our corporate governance structure consists of a board of directors, three advisory bodies, and a management team responsible for the day-to-day management structure and the various management committees.

The Board of Directors and the management team are responsible for steering Noatum's strategy.

BOARD OF DIRECTORS

Composed of Noatum's CEO, three independent directors and a representative of the sole shareholder. It has a non-executive chairmanship and a chief executive officer.

- Analyse the consolidated results and the work of the Group's management team.
- Approve the Group's strategy and monitor its implementation.
- Supervise and control the Group's budgetary management.
- Making major Group-wide decisions on investments, sale or acquisition of assets and corporate structuring.
- Evaluate and authorise master structure and remuneration policies.
- Evaluate and authorise strategic alliances and promote the implementation of mechanisms to have the most accurate information on all areas of the company.

ADVISORY BODIES

The three Advisory Bodies are composed of Noatum Holdings' directors and permanent guests from the functional areas of the ordinary management structure.

MANAGEMENT TEAM

The members of the management team with responsibilities at Group level, together with the heads of the business areas and various committees, from which they assume the following responsibilities:

- Analyse the results and the work of the area management team.
- Approve the strategy and monitor its implementation.
- Supervise and control budget management.
- Make major decisions at area level on investments, sale or acquisition of assets.
- Evaluate and authorise at area level the remuneration structure and policy.
- Evaluate and authorise strategic alliances at area level.
- Promote implementation mechanisms to have the most accurate information on the evolution of the business.

5.2. Transparency, ethics and integrity

At Noatum we have a **Code of Ethics** that contains the rules that should regulate the behaviour and attitudes of the members of Noatum, as an organisation, and their principles of action. Its purpose is to ensure ethical, transparent and upright management and performance. It is public and **accessible to all our stakeholders** through the corporate website.

Our Code of Ethics **applies at all organisational levels** and throughout all our operations. Both our employees and our partners are required to comply with and adhere to the Code.

Principles of Noatum's Code of Ethics.

- commitment to legislation
- commitment to the working environment and workers
- commitment to the protection of the facilities and the goods entrusted to us by our customers
- commitment to data protection and intellectual property management
- commitment to environment
- commitment to the various stakeholders
- commitment to collaborating with our business partners
- commitment to financial control
- commitment to society

All our staff must report illegal, questionable or immoral situations. In this regard, all chain of command members must be willing to appropriately hear and manage all situations of potential conflict. In addition, we have a **whistleblowing channel** accessible to any employee to report a possible crime affecting the company, workers or any stakeholder.

> All our staff must be aware of our Code of Ethics and ensure that they comply with it and adhere to it, since this is beneficial for everyone.

5.3. Regulatory compliance: **compliance** system management policy

In 2021, the Board of Directors of Noatum Holdings has approved a Compliance System Management Policy, and has revised the Regulations of the Whistleblowing and Case Management Channel and the Crime Prevention Manual.

The Compliance System Management Policy defines the general framework of the Group's compliance management system (objectives, principles and elements) and the risk areas for which responsibilities are defined among Noatum's professionals, and configures compliance risk management as a cross-functional effort.

The whistleblowing channel remains one of the cornerstones of Noatum's compliance management. Its regulation establishes the principles and guarantees to govern its use and management. And the Compliance Committee remains as the body in charge of supervising the operation and functioning of the compliance system.

In 2021, the Board of Directors of Noatum Holdings also approved a Policy and Procedure for Combating Money Laundering and Terrorist Financing, which are implemented as a harmonising, standardising and global exercise that associates a series of prohibitions with the necessary mechanisms to ensure their effectiveness.

5.4. Fighting corruption, bribery and money laundering

Through our Code of Ethics we express our commitment to fair business practices and values. Our policies and procedures implement anti-corruption, anti-bribery and anti-money laundering measures.

WE FIGHT CORRUPTION AND BRIBERY

Corruption, bribery or facilitation payments in all their active and passive forms, whether by acts or omissions or by creating or maintaining favourable or irregular situations, are prohibited.

In addition, since 2020 we have had an **Anti-Corruption and Anti-Bribery Policy and Procedure** in place that set out prohibited conduct and risk-sensitive conduct and scenarios, together with the controls to which they must be subject.

In 2021, Noatum Maritime has maintained its membership with MACN (Maritime Anticorruption Network) and has continued to engage external trainers on anti-corruption and anti-bribery.

WE FIGHT TAX EVASION, FRAUD AND MONEY LAUNDERING

We fight against money laundering and the financing of terrorist organisations; administrative management procedures include protocols against tax evasion, fraud and money laundering, with actions to control their administrative-financial implementation.

In order to standardise controls and procedures across the Group, and to give visibility to our standards, the **Anti-Money Laundering and Terrorist Financing Policy and Procedure** was adopted in 2021.

WE BELIEVE IN FREE COMPETITION

In order to actively ensure that our business practices are in full compliance with the law, an unequivocal message of opposition to anti-competitive behaviour has been conveyed to our employees.

Since 2020, the Noatum Group's **Competition Policy and Manual** have been in force as global standards. The Policy describes Noatum's commitment to this effort and sets out the prohibitions and guidelines to be observed by Noatum members as an organisation.

5.5. Organisation's risk management

At Noatum, we are fully committed to managing the risks associated with our global business.

We regard Risk Management as an integral part of the way we manage the Group's various activities.

To this end, we have appointed risk managers in the different business areas, divisions, geographies and activities of the company. These managers are seen primarily as managers of the risks associated with the activities they manage.

Risk management is also conceived as a tool to support decision-making by providing strategies to manage and control risks.

Risk Management at Noatum is assumed as a cross-cutting exercise led by the Risk Management Department, which coordinates and supports actions to control, reduce, mitigate and avoid risks.

We work to mitigate our risks so that they have the least possible impact on the Organisation, be it on our service to our customers, our employees, the environment or our stakeholders.



Continuing with the exercise that already commenced in 2020, consisting of the definition of a methodology for the identification of risks and opportunities at a local level, during 2021 it has been put into practice in the different business areas of Noatum. As a main result, an **action plan** has been devised **for each operational site analysed, which has led to improved risk management at local level**.

The plan, designed jointly by the corporate Quality and Risk areas, enables to link the identified risk with the stakeholder and the affected area, categorising the bottom-up risk, jointly establishing an action plan, monitoring it and scheduling the subsequent evaluation of the effectiveness of the measures taken.

This line of work has enabled the identification of opportunities for change and improvement associated with risks, providing more specific data on risk registers and controls.

The **identified risks** are dealt with by means of:

Internal management: addressing risks by defining action plans with the objective of minimising the risk of materialisation and the potential impact identified in the analyses.

Outsourcing, using the insurance markets to externalise insurable risks so that there is no impact on the Group's assets or those of our stakeholders.

Preparatory actions have also been carried out for the launch in 2022 of a **Risk Map incorporating the entire perimeter of activities, businesses and geographies**, incorporating the risk categories:



6
A SPECIALISED TEAM

6.1.
Our human capital

As our **People Manifesto** states, the people who work at Noatum act as a single, specialised, business-oriented team, with excellence and continuous improvement to serve our customers.

At Noatum, people are the most important element. That is why we place our teams at the centre of our decisions: we are firmly committed to their well-being and safety.

One Brand

- Being the best ambassadors of our brand
- Ensuring that our actions always reflect our brand and values
- Complying with our Code of Ethics

One Team

- Working together as a team
- Fostering individual potential, while working on our collective strengths
- Striving for excellence and continuous improvement

One Goal

- Committing ourselves to our goal to exceed customer expectations
- Relying on innovation as a driver of transformation
- Caring for our people and protecting the environment



OUR STAFF IN FIGURES

2385
professionals

47%
women

53%
men

60
nationalities

91%
staff with permanent contracts

99%
full-time staff



6.2.
People Strategic Plan 2020-2022

At Noatum, people management has experienced a transformation over the years. In this sense, management has been developed and constructed with care and consideration for the fact that we are a truly global organisation of people.

Our **People Strategic Plan 2020-2022** sets out the roadmap for achieving our human resources objectives. This plan responds to the need to redefine and adapt the Group's culture to new global challenges.



MISSION

We are One Team. Our team is at the heart of our current and future activities and projects. We act as one team in the service of our teams and our companies. Human resource management is a lever for change and transformation.

VISION

Noatum is a place where people can grow personally and professionally with values and an ethical perspective.

CONDUCT

We work as one, focused on the Business (value-added partners), with excellence and continuous improvement to serve our customers.

Among the **main lines of action** of this plan in 2021, the following should be highlighted:

We implement and ensure compliance with human resource **policies and procedures** within business units and across all our locations. We build **a relationship of trust** with colleagues and stakeholders in their area of responsibility.

We anticipate trends and we seek to **increase operational efficiency:** we strive to innovate and drive change.

We lead global projects to exploit synergies.

We work in partnership with directors, managers and staff **in making decisions related to human resources**. We offer professional advice, training and customised solutions that meet our business needs, improve working relationships, increase productivity, talent development and retention, and support and add value to the business.

We implement global policies and tools and use them locally.

We improve the experience of our customers and employees.



Two important initiatives carried out in 2021 as part of our people management strategy should be noted: cultural change and digital transformation.

CULTURAL CHANGE

In 2021, we have launched a number of initiatives across the Group that will be the foundations of the company of today and tomorrow, based on health, safety and well-being, leadership, communication, training and digital transformation.

The *to-be* model aims to implement a new culture change programme on a global scale to redefine the Noatum culture. It is based on our People Manifesto: One Brand, One Team, One Goal.

The cultural change at Noatum is affected by several aspects: the Group is facing new challenges. The current cultural situation is facing new challenges in a changing and highly competitive market, and we want to be leaders in all our activities.

The project approach is divided into six workflows, which aim to evolve the company's health, safety and well-being culture and practices to achieve #ProudToBeNoatum status.

WORKFLOW	DESCRIPTION
Cultural change management (global)	We have strong and distinctive values: care, continuous improvement, customer success, excellence, integrity and teamwork. We also have core competencies: commitment, customer orientation, results orientation, teamwork and change management. We want to create a culture of high performance. We must make progress in four areas: customer focus, innovation and digitalisation, agility, and acting as one team. Our customers and teams will recognise us through our Noatum culture.
Leadership model:	"Proud to be Noatum" is really about working with great people. It is a place where great people work as a great team. Great people encourage, develop and take pride in belonging to such a community. Finding and developing great people is the task of leaders.

WORKFLOW	DESCRIPTION
Communication culture	We define the foundations of the communication culture that enables Noatum to develop the cultural change necessary for its implementation. We increase the efficiency of communication and develop employee engagement. We pass on the knowledge of Noatum to all employees and support the sense of belonging to the Noatum Group through active listening.
Digital training and talent attraction	We define the skills that each profile should have in terms of digital capabilities. We incorporate a digital mindset by launching a digital transition programme and redefine the recruitment strategy. We enable senior management to own digitalisation and expand their digital capabilities.
Health, safety and well-being	We improve workers' health and reduce accident rates, while improving the working environment, motivation, participation and corporate image. We increase productivity, efficiency and business competitiveness by reducing absenteeism and promoting talent retention. We promote continuous improvement in production and increase the quality offered. We ensure that work equipment and facilities are adapted to the ergonomic and safety needs of people.



DIGITAL TRANSFORMATION

In 2021 we have launched new software to help us deliver our strategic people plan.

The aim of this project is to develop a people-centred culture that brings value to the business and to people. We work on five key levers: efficiency, business, talent, culture, and health and safety. To achieve this, we have worked to implement globally consistent human resource policies, procedures and systems.

The implementation of the HR platform initiative improves the management of the employee life cycle from the attraction of new talent, including selection, onboarding, welcome pack, education and training, performance, administration, etc. It is about having the right information, in a timely manner, to make the right decisions to serve people and business.

The approach defined for the implementation of the HR platform is divided into five workflows:

META 4HRIS

Single source of company-wide data with all current employee information.

Connected to payroll systems.

Connected to other systems (Bizneo + GTA) to have all the information available and connected.

Develop the rest of the Employee Life Cycle (performance review, talent, succession, training).

New flexible plan for Spain

New platform available in Spain that allows the management of flexible remuneration products and services in an agile, convenient and efficient way.

GTA for time control in Spain

New platform available in Spain integrated in the Meta4 central system for time and attendance control.

Bizneo job portal

Global recruitment software platform to manage processes on a worldwide scale. Post new positions inside or outside the company and manage the efficiency of CVs.

Bizneo will be integrated with Meta4 to ensure a single source of data and to manage and monitor the information of all employees.

Noatum Corporate University

Evolve the Corporate University platform (already implemented in Spain) and migrate it to the rest of the regions.

Eight apprenticeship schools are available to all employees worldwide.

6.3.
Pay policy and salary gap

A specialised, diverse and global team like ours requires a flexible remuneration policy adapted to the different cultures and conditions of our business.

The main objective of this policy is to **retain, attract and motivate the best professionals,** ensuring internal equality and external competitiveness.

The average remuneration of our team is presented below. Of particular note in 2021 compared to 2020 is the increase in average pay for women by more than 3%, for those under 30 by more than 8%, for middle management by more than 6% and for directors by 1.46%. The decline in average remuneration in the other cases is explained by the entry of Argentina into the scope of the report, the entry of Quellaveco and Miura (Peru) and the exchange rate effect, as currencies in many countries lost value against the euro.

The average remuneration of the members of the Board of Directors and Executive Management of the parent company, including all remuneration items, in 2021 amounted to €289,000[1] (€236,250 in 2020).

[1] No comparison with women is provided because the group is comprised exclusively of men.

Average remuneration (in euros)	**2021**	2020
By gender		
Women	30,971.64	29,983.94
Men	40,236.10	41,502.05
By age group		
Below 30 years	21,386.21	19,719.96
Between 30 and 50 years	35,028.31	35,504.76
Over 50 years	51,738.01	52,521.16
By professional category		
Staff	26,138.42	26,418.89
Middle management	50,314.88	47,257.35
Directors	104,979.39	103,472.00
Top management	228,999.10	229,368.26

We are determined to make further progress on **gender-based pay equality,** in line with our commitment reflected in the equality plans, especially considering that we are in a historically male-dominated sector, where the most senior and, in many cases, positions of responsibility are occupied mostly by men.

However, we are making progress: a comparison of the **salary gap** ratio in 2021 compared to 2020 shows a **decrease of 4.6** percentage points. The same occurs for the **weighted salary gap** ratio, which shows a **decrease of 4 percentage points** compared to the previous year.

Salary gap	2021	2020
By gender		
Annual salary for women	29,496.07	29,079.42
Annual salary for men	37,739.03	39,519.88
Ratio	**21.84%**	**26.42%**

Remuneration data used for the calculation of the salary gap does not include the variable amount.

Weighted salary gap	2021	2020
By gender		
Annual salary for women	29,496.07	29,079.42
Annual salary for men	37,739.03	39,519.88
Ratio	**4.66%**	**8.56%**

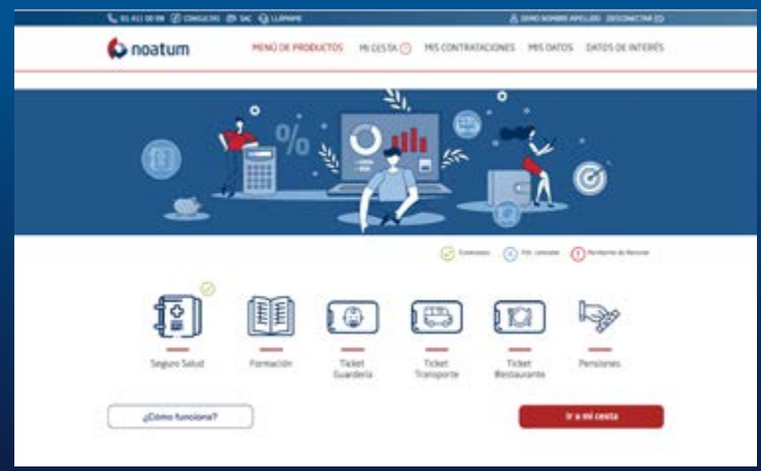
For more details on the formulas for calculating the pay gap, refer to 9.2. Index of contents required by Law 11/2018

FLEXIBLE REMUNERATION

In 2021, we launched a **flexible remuneration plan** in Spain**,** which allows us to maximise our employees' salaries. It is a compensation system whereby each employee decides how to receive part of his or her monetary remuneration to suit his or her personal and family needs at any given time.

THIS PLAN INCLUDES:





6.4.
Our vision of equality and diversity

The progressive increase of women in our workforce, the incorporation of people of other nationalities, the incorporation of younger people to rejuvenate the workforce, the recognition of senior staff, as well as the integration of people with disabilities, are proof of the respect for the different dimensions of society that make up our global commitment to equality and diversity.

That is why one of our main objectives is to promote actions that demonstrate that equality is one of our priorities. To achieve this goal, we are engaged in a continuous learning process and take all necessary measures to achieve the eradication of inequality in the workplace.

Noatum has a global commitment to equality and diversity: we believe in diversity among our employees as a driver of the Group's growth to create an environment of tolerance and mutual respect.



EQUAL OPPORTUNITIES FOR WOMEN AND MEN

We declare our commitment to the establishment and development of policies that integrate equal treatment and opportunities among women and men, without discriminating directly or indirectly on the basis of gender, as well as to the promotion and encouragement of measures to achieve real equality within our organisation. To this end, we establish **equal opportunities as a strategic principle** of our corporate human resources policy.



Business	Progress 2021
Noatum Logistics Spain Marítima del Mediterráneo	We register the **equality plans in force** in the Register and Deposit of Collective Agreements, Collective Labour Agreements and Equality Plans (REGCON). The equality plans were communicated by the chairmanship to the staff and published on the intranet.
Noatum Holding	Qualitative and quantitative information was gathered to initiate the **diagnosis of the situation**.
Autoterminal	We set up the **negotiating committee for the equality plan**.
Companies in Spain	We have **salary records for all companies**.

In 2022 we plan to present the equality plans of Noatum Holding and Autoterminal at REGCON, as well as to continue the adaptation of already registered plans.

Among the measures carried out in 2021, within the framework of the action plan for Noatum's companies in Spain, the following should be highlighted:

Line	Actions
Communication and language	Dissemination of the **management's commitment** to the value of equality and diversity. **Revision of the androcentric language** of internal communication (web, intranet and documentation). Development of an **inclusive language manual**. Include in the onboarding of the new intranet: • Social benefits policy • Work-life balance policy • Sexual and gender-based harassment protocol • Summary of the Equality Plan
Joint responsibility of the rights to personal, family and working life	Create a **work-life balance plan** which includes existing measures.
Selection, recruitment, career development and training	Create a **statistical yearbook** indicating recruitment and promotions by gender, category, type of contract and training levels achieved. **Create the School of Equality and Diversity** in the Corporate University and include the gender awareness course for staff in Spain. Train the Committee on Equality. **Include social benefits in** job advertisements.

Line	Actions
Remuneration policy	Create a **policy on our social bonuses**. Create an **information campaign** to disseminate existing social bonuses.
Prevention of sexual and gender-based harassment	Review and update the protocol on sexual and gender-based harassment. Train staff on **sexual and gender-based harassment and equality**. Train the health and safety committee and other persons in charge of **occupational risk prevention on sexual and gender-based harassment**.
Professional category and under-representation of women	**Promote the under-represented sex in the face of two candidates of equal merit and ability.** Include messages in job offers and partnerships with suppliers explaining the **commitment to the value of equality and zero tolerance of sexual and gender-based harassment**.

In short, we have made a firm **commitment to promoting and fostering measures to achieve effective equality between women and men in our Group**, as the backbone principle of our corporate people management.

PROCEDURE FOR DEALING WITH HARASSMENT AT WORK, SEXUAL HARASSMENT AND RELATED SITUATIONS

Noatum has a procedure for dealing with harassment at work, sexual harassment and related situations, which establishes the commitment of our Senior Management to adopt all necessary measures to **ensure a psychosocially healthy work environment, free of harassment, in which conduct of this nature is not permitted**.

This procedure applies to all our employees, as well as to our stakeholders, and is intended to:

- Establish the principles of action, within the framework of our Code of Ethics, for the prevention and resolution of possible situations of harassment at work, sexual harassment and other related situations.
- Integrate our Code of Ethics in dealing with cases of harassment, sexual harassment and other related situations in the workplace.
- Protect the health of workers by ensuring psychosocially healthy working environments.
- Inform workers about preventive and resolution measures in situations of alleged harassment.
- Offer help to those affected by means of a specific protocol.





INTEGRATION OF PERSONS WITH DISABILITIES

Noatum is committed to the right to work for people with disabilities in conditions that guarantee the application of the principles of equal treatment and non-discrimination.

In order to have a satisfactory relationship with our team, we start from the understanding of respect for people, equal opportunities, dialogue and the non-existence of inequalities, as established in our Code of Ethics.

Within this framework of action, in 2021 we moved forward by adopting the necessary measures to comply with the General Law on the Rights of Persons with Disabilities and their Social Inclusion in Spain. To this end, we promote different initiatives in collaboration with the Adecco Foundation to contribute to the integration of people with disabilities into the labour market and job creation.

Among these initiatives, the following should be noted:

Awareness-raising sessions with Adecco Foundation ambassadors	Aiming to convey our commitment to diversity.
Disability Day	Campaign to publicise the company's commitment to disability.
Family Plan	Financial assistance of between 1,500 and 3,000 euros in a programme to accompany employees with family members with disabilities.
Training	Specific training to eliminate prejudice, mandatory at our Corporate University.

Volunteering in inclusive activities.

6.5. Work-life balance

We are committed to ensuring a work-life balance, and for this reason we facilitate all possible measures that, in each case, improve the quality of life of our professionals.

The balancing measures adopted by the Group include:

- Maternity and paternity leave complemented up to 100% of the salary if the legal framework of the country so indicates.
- Request for a change of working day.
- Application for leave of absence.
- Nursing accumulation. In the specific case of Spain, the company grants 14 working days of leave, regardless of the delegation, unless the applicable agreement provides for an improvement on the established term.
- Flexible working hours (depending on the delegation).
- Teleworking. For the duration of the exceptional situation following COVID-19, teleworking and flexible working hours are facilitated.
- Reduction of working hours due to legal guardianship.
- Other measures provided for in the applicable collective agreement.



These work-life balance measures, such as flexible working hours or the promotion of teleworking, complement the organisation of the working day in accordance with the regulations of each country and the agreements applicable in each specific case.

We continue to make progress in organisational improvements for the well-being of our staff. In this sense, **we acknowledge the right to disconnect from work**, aware of the risk that technology in the workplace and its influence on new forms of flexible work may interfere with people's personal and professional life balance. **We are therefore working on the development of a more detailed digital disconnection policy**.

6.6.
We promote social relations

We promote labour relations based on dialogue, so that communication between our teams and the social partners is constant, transparent and fluid.

In accordance with current labour legislation, we establish formal channels of communication with the **workers' legal representatives**. In particular, meetings with the workers' legal representatives in Spain, attended by our People director, take place every two months.

The **freedom of association** of our employees is guaranteed in all our contractors and suppliers with whom we have a relationship.

100 % of the workforce in Spain, Portugal and France is covered by collective agreements.



SPAIN

Collective agreements vary by province and sector.

PORTUGAL

The collective agreements CCT Transitários and CCT Agentes de Navegaçao apply.

FRANCE

Convention collective des Transports Routiers et acitivités auxiliaires de transport No. 3085 applies.

In the other countries where we operate, our employees are covered by the corresponding labour regulations.

Another mechanism for channelling and articulating the improvement of working conditions are the **health and safety committees** for consultation on the company's actions in the area of occupational risk prevention. Such health and safety committees are in place in the United States, Turkey, Spain, Peru, Chile and Colombia.

6.7. Safety, health and well-being of our team

Caring for people is our top priority. That is why we look after each other and act as one team.

Year 2021 has continued to be marked by the health crisis caused by COVID-19, hence this priority has been further reinforced in this context. We have maintained existing protocols and procedures in order to improve them and adapt them to these new risk scenarios for people.

Our commitment in the area of health and safety involves the **total well-being** (physical, mental and social) of **all staff and our stakeholders**. We strengthen their attitudes towards productive work in a safe environment and a healthy organisation.

In 2020, we published the **Noatum Health and Safety Policy**, communicated and distributed globally, which reflects our vision to improve health and safety behaviours.

Our concern and interest is focused on the individual, always from a comprehensive and integrated approach, and considers health in all the organisation's policies, in addition to strict compliance with legal requirements on health and safety. Some of our companies are certified in accordance with **ISO 45001:2018**, on safety, health and well-being at work, as proof of compliance, added value, effectiveness and efficiency.

KEY PRINCIPLES OF CONDUCT:

1. Active participation of all employees in health and safety management systems.
2. Communication of all projects, improvement measures, risks and incidents affecting both workers and facilities.
3. Compliance with all legal requirements and maintenance of our standards if they are stricter.
4. Identification and assessment of all safety and health hazards.
5. Continuous improvement and updating of global health and safety objectives.
6. Ensure compliance with our health and safety standards with respect to all contractors, visitors and stakeholders.
7. Provision and maintenance of safe protective equipment.
8. Provision of health and safety training activities.
9. Zero tolerance for unsafe behaviour in the workplace.
10. Provision of sufficient resources in accordance with corporate health and safety priorities.
11. Promotion of consultation and participation among all employees.



Based on our Health and Safety Policy, we developed the **HS&W Plan**, on health, safety and well-being, which has a global scope and represents a firm step towards a corporate culture of safety and Vision Zero.

The key objectives of this plan are:

- **Moving towards Vision Zero**
  - Accidents at work and occupational illnesses are not determined by fate, nor are they inevitable; they always have a cause. By building a strong safety culture, these causes and thus occupational accidents, injuries and illnesses can be eliminated.

- **Health, safety and well-being culture**
  - Ethics and values: caring for our people and protecting the environment.
  - Attitudes: proactivity, conviction versus obligation.
  - Beliefs: knowing root causes to predict new events.
  - Behaviours: visible and measurable.

- **Massive transformation**
  - Transform weaknesses (risks) into strengths (safety culture).

- **Leadership**
  - We became leaders in safety.

- **Aligning business units and HS&W**
  - To avoid cost overruns and legal liabilities.

At the beginning of the year, in connection with the promotion of the health, safety and well-being culture, we decided to create a logo that would be easy to identify and that would help all our *safety leaders* feel identified and help them to transmit the values of health and safety to everyone in each region:



OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

The Health and Safety Management System, in accordance with ISO 45001, is part of the Integrated Management System. It enables us to identify and control health and safety risks, reduce accidents, support legal compliance monitoring and improve overall performance, all to promote a safe and healthy environment.

OUR INTEGRATED MANAGEMENT SYSTEM ENSURES THAT:

All our health and safety standards are met in all divisions of the Group.

There are common roles and responsibilities for all divisions, safety leaders and managers.

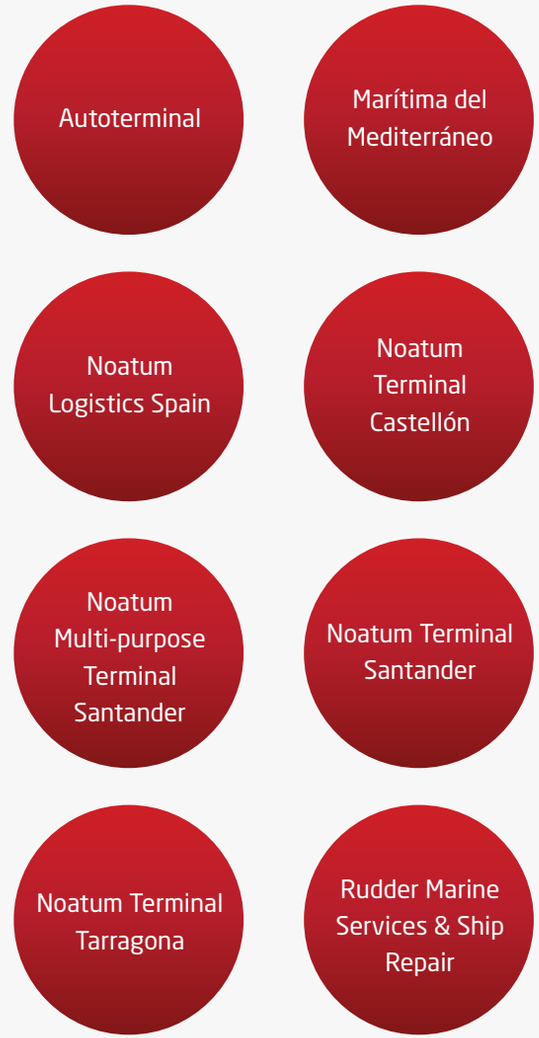
It is a shared proposal in relation to to leadership management.

In this respect, two main procedures should be highlighted:

Leadership & Management	Roadmap aimed at supporting the strategic processes already in place and improving them.
Roles & Responsibilities	Protocol for the promotion of best safety practices in our organisation.

Safety leaders are an essential part of improving health, safety and well-being processes and ensuring the effectiveness of our goals and programmes.

Scope of the ISO 45001 management system



Progressively, more and more Group companies are joining the external audit programme. Regardless of this, we have a strong commitment to ensure that our management system goes further in the application of procedures and processes, and in the definition of goals, programmes and objectives. Likewise, and within this integrated approach, we are firmly committed to collaborating with stakeholders with the aim of ensuring continuous improvement in all work centres where there are other collaborating companies or contractors.

According to **ISO 45001, stakeholders are taken into account within the management system when it comes to**:

- Having access to the Group's Occupational Health and Safety Policy.
- Having access to internal or external communications (e.g. lessons learned in relation to incidents).
- Participating in emergency preparedness and response, such as drills (e.g. stevedoring company participates in emergency drills).
- Being aware of the results and findings of internal and external audits.
- Having access to information regarding incidents, non-conformities and corrective actions.
- Defining needs and expectations.
- Continuous improvement.

IDENTIFICATION OF HAZARDS, RISK ASSESSMENT AND INVESTIGATION OF INCIDENTS

In 2021, we implemented changes to the hazard identification, risk assessment and control determination procedure in order to ensure better control of residual risk and to make further progress in improving preventive planning. These changes include the detection of unassessed risk, risk assessment structure and condition monitoring.

OCCUPATIONAL HEALTH SERVICES

We always seek to exceed legal requirements in relation to the health of our teams. Apart from the promotion of health monitoring and annual programmes aimed at improving well-being, there are channels for consultation and participation so that anyone can send a proposal, a suggestion or a risk communication.

HEALTH AND SAFETY TRAINING

All Noatum employees have received sufficient and appropriate theoretical and practical training in the field of prevention. Not only do we train them at the time they are hired, but training is updated when there are changes in functions or working conditions or when new technologies are introduced that involve new risks or significant changes to existing risks. To this end:

- We identify training needs in health, safety and well-being.
- We determine the content of health, safety and well-being training and its target audience.
- We plan the actions, as well as their frequency and the necessary refresher courses.
- We control both the quality of training and its delivery.

Highlighted actions in 2021

50-hour basic course	It was given to 48 people, including *safety leaders, focal points,* maintenance and operations personnel in the port environment. This campaign involved 2,400 hours of training provided to seven port terminals.
Global in-house training for *safety leaders*, managers and operational managers	It was delivered to 149 people in different countries and amounted to 44.7 hours, emphasising the global incident reporting procedure and the importance of reporting all types of incidents, regardless of importance, through the SmartOSH application.

To raise awareness and educate the general public about the importance of safer workplaces for all, on 28 April 2021 **we commemorated World Day for Safety and Health at Work**, promoted by the United Nations: our **Safety Day**. In this context, we launched the Safety Challenge competition to test our health and safety knowledge at Noatum. More than 500 contestants took part in the competition, 10 of whom received a prize of 250 euros.



PROMOTING HEALTH

The main voluntary health promotion programme we offered in 2021 to our workforce was **health insurance, included in our flexible remuneration system**, with tax, financial and convenience benefits.

RESPONSE TO THE COVID-19 PANDEMIC

For the second year, the ***Coronavirus guidelines*** document is part of the header on our intranet. It is constantly being revised in line with updated health recommendations. The global spread of the virus makes us aware of the different situations of contagion and the corresponding preventive measures to deal with such a situation, in accordance with the predictive model of anti-COVID management. In addition, we have developed a reporting system so that all cases are known immediately.

It should be noted that we have a **comprehensive COVID risk assessment**, which has been revised 17 times not only to include legislative changes but also to include improvements that the Health, Safety and Well-being area proactively decided upon.

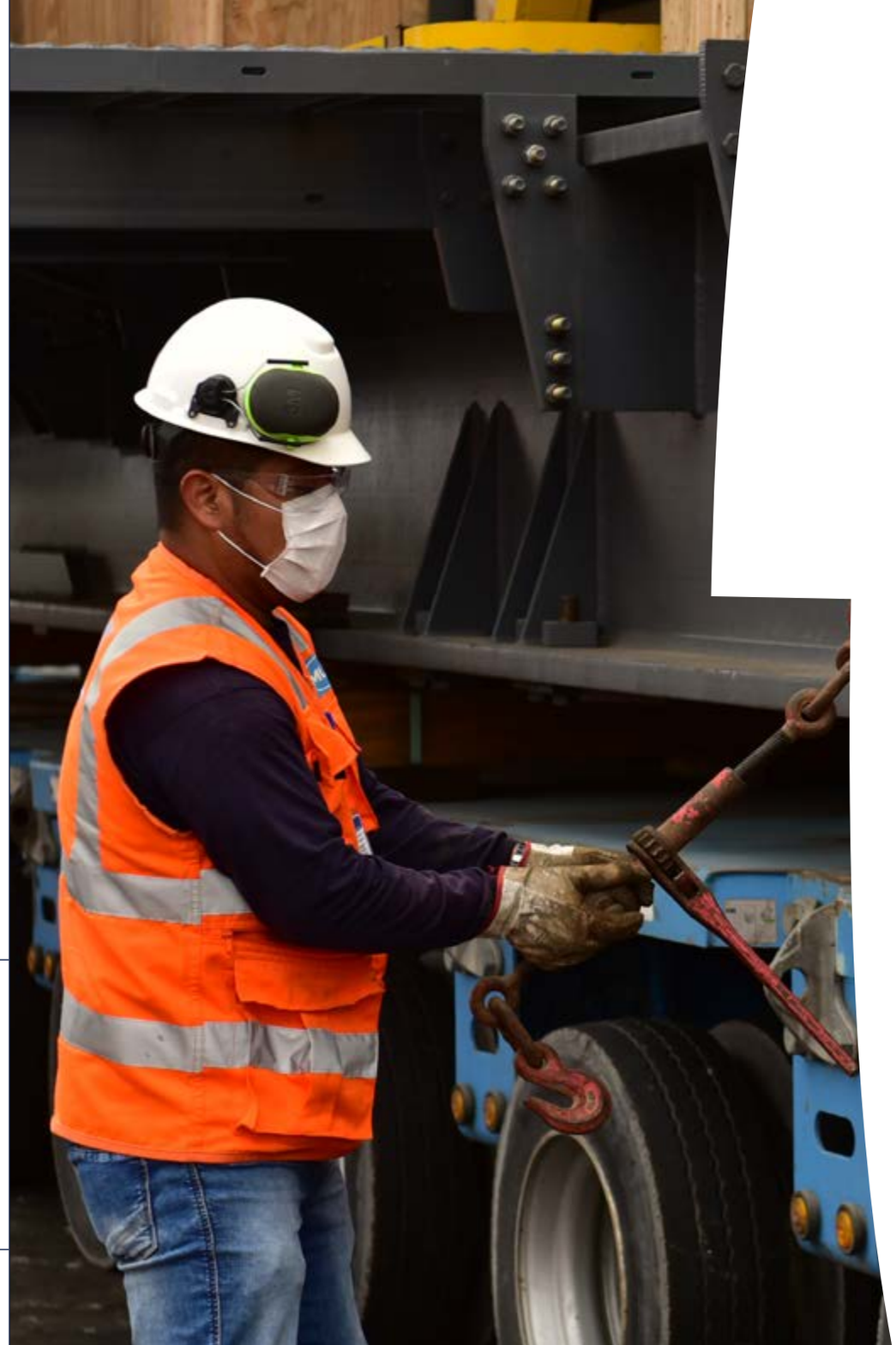
SMARTOSH ADVANCES

Another highlight in 2021 in the area of health and safety was the **global implementation of all functionalities of the SmartOSH software application**. The knowledge gained from years of experience in the use of the software tool on a national scale (Spain) has been of great help in making further progress in proposing improvements with a positive impact on the management of all the Group's *safety leaders*. As proof of commitment and leadership, the Group's application has seen an **increase in participation by all staff**. A well-known **channel for consultation and participation** of the entire workforce has been set up, where all our staff can make any proposal or suggestion regarding safety, health and well-being.

One of the functionalities offered by this IT tool is the **immediate notification of incidents and other events** via a mobile phone application. This allows managers and senior management to be instantly informed of any non-conformities within the organisation.

All our regions and business units can use the same software tool for incident reporting and management. **This allows all incidents to be reported and for control measures to be implemented to prevent their occurrence**. From now on, all Noatum *safety leaders* and *focal points* can report incidents and other occurrences, and then manage this information to control non-conformities, all through a platform that allows the digitalisation of key management processes. On the other hand, the use of this tool allows the reported information to be analysed with a view to defining predictive models. These predictive models are key to ensure that incidents do not reoccur and prevent risks from arising, as well as to ensure that residual risk is controlled.





6.8.
Training and talent development

Fostering talent and lifelong learning so that professionals can consolidate themselves within our organisation.

The values that define our company detail the importance of developing the potential of our people. That is why we strive to make Noatum a place where people learn, develop and have the opportunity to add value to the business, as well as fostering their own personal and professional growth.

One of the key levers of our People 2020-2022 strategic plan is to foster the talent of the people who work in our organisation. In this sense, our objective is to develop a **leadership model** that fosters the attraction, retention and motivation of the best available talent and ensures the sustainability of the company.

We believe that **continuous learning** and **professional training** is a solid basis for successfully developing our business and achieving all our objectives with the level of excellence that defines us.

Our **training and talent development plan** is based on the following pillars:

- **Continuous learning**, directly related to the development of professional skills and potential.
- The commitment to **our talent** with *ad hoc* programmes.
- The **active participation** of our staff in their own professional development, so that they propose the training actions they consider necessary and become an active part of their own itinerary.
- The detection of our knowledge assets and their incorporation into our programmes, so that this knowledge becomes **collective learning**.
- The **Corporate University** as a driving force that facilitates our employees' access to training programmes and favours global standardisation.
- Enhancing the **transfer of knowledge** to the workplace.
- The **annual training plan**, which includes the training needs detected in the annual development interview, the generic training actions proposed for the team and the training actions listed in the catalogue. In addition, we offer the possibility of requesting external courses that are not included in the catalogue, but are considered useful for professional development.

ONBOARDING

An important part of our training effort is in the area of onboarding schemes. In this regard, in 2021 we defined a Group-wide application procedure, including webinars to communicate the content of the new welcome model and the presentation of the new *onboarding* model at the People Meeting.

CORPORATE UNIVERSITY

In 2021, we restructured and expanded the Corporate University, which was only available to our subsidiaries in Spain, and created the new **global Corporate University** which is now available to all our employees. This platform for learning and training in different subjects and skills has been upgraded and transformed into an integrated learning portal, accessible to all.

We aspire for this new platform to be an **interactive tool with growth potential**, guided by the experience and suggestions made by its users. In order to offer our employees a highly efficient and practical tool, we implemented changes to the portal to adapt its services and improve its performance. In addition, it offers the possibility to customise courses by region or country according to specific needs.

As we expect that some training may be targeted to a particular interest group, we are also open to **suggestions and requests** for additional training.

At the same time, **the available content is continuously adapted and updated** according to the needs that arise, as it is an agile and flexible platform.



LEADERSHIP SCHOOL

In 2021, we launched the **Noatum Leadership School** to grow and develop our people in leadership. Our school has three levels, which run consecutively.

The first level aims to:

- Learn and internalise the Noatum leadership model.
- **Develop key behaviours** derived from Noatum **values** and **competencies** associated with team management.
- **Train** in the skills and provide the knowledge necessary to manage teams.

The programme takes place in a virtual format and is comprised of four modules:

- Leadership in Noatum
- Myself as a *manager*
- Listen and *feedback*
- Planning in order to achieve results



6.9. Defence of human rights

Noatum respects all internationally recognised human rights, especially those that are relevant to our business and our stakeholders.

We are aware of the importance of complying with the human rights recognised in national and international law, in accordance with the **principles and guidelines of the United Nations, the International Bill of Human Rights** and the principles set out in the **Declaration of the International Labour Organisation**.

Human rights commitments		Actions for their protection
Noatum as a safe environment	Creating a safe environment that protects all persons from discrimination or harassment on the basis of ethnicity, race, age, religion, gender, nationality or any other defining characteristic of the individual.	We request external audits of health and safety conditions at Group facilities.
Promoting respect	Maintaining a work environment that fosters respect for all employees and establishes their growth based on strict performance criteria.	Our internal regulations prohibit any form of tolerance or permissiveness of practices that could lead to slavery, forced or compulsory labour and human trafficking.
Maintain the highest standards of business ethics, integrity and compliance.		The effective abolition of child labour.
		Banish behaviour in accordance with the UK Modern Slavery Act.

The possibility that Noatum's assets and services could be used in the commission of criminal acts that violate human rights is duly considered in our risk map. For this reason, we work closely with our stakeholders to prevent such risks from materialising and thus contribute to combating such practices.

Risk cases detected in our operations as an organisation are addressed on a case-by-case basis, with specific solutions for each geography and with the aim of elevating any best practices identified to a global culture.

During 2021, there were no reports or complaints of human rights violations in any of the regions where the Group operates. Nor have any significant fines or non-monetary sanctions been imposed on the Group for non-compliance with laws or regulations on social matters.

7
CARING FOR THE ENVIRONMENT

Noatum: an inescapable commitment to the environment

CULTURE OF ENVIRONMENTAL SUSTAINABILITY

- We promote a **sustainability approach**, integrating it into our business activities.
- We make our employees aware of **good environmental habits**.
- We signed agreements on the **Guidelines for Good Environmental Practices** with the corresponding Port Authorities.
- **We approve suppliers and subcontractors**, requesting their commitment to comply with our environmental requirements and their adherence to our Environmental Policy.

ENVIRONMENTAL MANAGEMENT SYSTEM

- We work to ensure continuous improvement of our **Environmental Management System**.
- **We regularly assess** our level of environmental compliance.
- We identify environmental risks, and after an assessment and prioritisation of these, we establish **measures for their mitigation**. From this analysis, we identify possible opportunities for improvement.
- We have Group companies* that are certified in:
  - ISO 14001
  - EMAS
  - ISO 50001
  - Declaration of compliance with the Guidelines for Good Environmental Practices of the different Port Authorities.



FIGHT AGAINST CLIMATE CHANGE

- **Transparency in reporting our environmental footprint:**
  - We use specialised software to record consumption and waste and to calculate the carbon footprint for **Scope 1** (direct GHG emissions associated with fossil fuel consumption) and **Scope 2** (indirect GHG emissions associated with electricity consumption).
  - In 2021, for the first time, we calculated our **Scope 3**** emissions (other indirect emissions)
- **Sustainable purchasing criteria:** We have established that the energy supplier selected in Spain must have a Guarantee of Origin Certificate. In this way we ensure that **100% of the electricity consumed originates from renewable sources**.

RESPONSIBLE AND SUSTAINABLE USE OF RESOURCES

- **Optimising the consumption of natural resources**.
- **Managing our waste sustainably and responsibly.**
- **Gradually phasing out single-use plastics.**
- **Reducing our paper consumption.**
- **Replacing conventional lighting elements** with LED technology lamps.

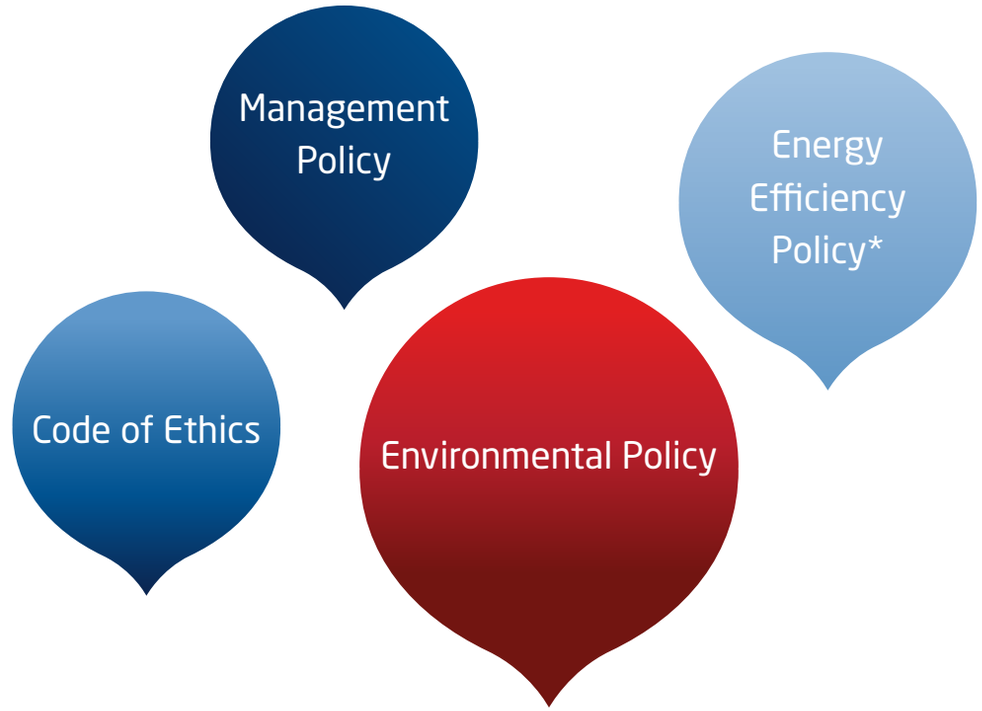
* the list of companies with these certifications can be found in Appendix *3.1 List of companies with environmental certifications.*
** for the activities detailed in section 7.5 Fight against climate change.

7.1.
Our culture of sustainability

In Noatum we are committed to working and growing as a Group in a responsible and sustainable manner in the environment in which we operate.



Our culture of sustainability is promoted from senior management level and is integrated transversally in all operations and business areas. To implement this culture in the Group, the governing bodies promote the deployment and implementation of:



* Policy that applies to Noatum Terminal Sagunto.

COMMITMENT TO THE ENVIRONMENT IN THE CODE OF ETHICS:

COMPLIANCE WITH LEGISLATION	We have a **system for identifying and ensuring compliance** with current environmental legislation.
ENVIRONMENTAL MANAGEMENT SYSTEM	We ensure the maintenance of the Environmental Management System as part of our commitment to sustainable development and environmental protection. We pay special attention to **preventing pollution and minimising the environmental impact** of our activities.
AGREEMENTS RELATING TO GOOD ENVIRONMENTAL PRACTICES	We are committed to the Port Authorities in the **implementation of the Guidelines for Good Environmental Guide**.

To advance this culture of sustainability, we have taken a step forward by establishing an ESG Committee (Environmental, Social, Governance) at the end of 2019, comprising senior management and the corporate areas involved in decision-making in these fields.



The **ESG Committee** has the objective of analysing and approving the sustainability actions defined by the Group, as well as the review and evolution of the objectives established annually.

The environmental objectives and actions promoted by the ESG Committee for the 2021-2022 period are as follows:

	Objectives	Actions
Single-use plastics 	**Phasing out single-use plastics in offices**	Reducing their dependence for coffee, water and kitchenware supplies in canteens and *coffee corners* In 2022, a **corporate bottle** will be launched so that all employees can refill their bottles at the water fountains provided by the organisation, thus avoiding the use of plastic bottles and cups.
Lighting 	**Progressive replacement of conventional lighting elements with LED technology lamps** in workplaces	We are moving forward either by renewing fused or damaged elements or by renovating installations, thus incorporating more LED lamps and floodlights.
Paper 	**Reducing paper and printing consumption** in offices	In order to move towards a paperless culture, we are working on different actions such as the standardisation of processes linked to the management of paper documentation, the sending of information in digital format or the use of *cloud-based* document repositories validated by the Organisation.

It is worth noting that in 2021 our General Management has launched a communiqué to all regions where we operate, recalling the importance of achieving these objectives. In this communiqué, the different regions are asked to **set their own targets** for these objectives, depending on **the context of their location and activity**.

The ESG Committee is currently working on the definition of a **sustainability strategy** that will focus on:

- A DECARBONISATION PLAN
- A PLAN FOR A CIRCULAR ECONOMY AND ENVIRONMENTAL PROTECTION
- A COMMUNICATION, PARTICIPATION AND TRANSPARENCY PLAN



7.2. Environmental Policy and Management System

Respect for the environment must be present in all our operations and is also reflected in our Mission, Vision and Values.

Our Environmental Policy

Published in 2020, our Environmental Policy aims to set out the governing principles that mark and guide the Group on the environmental performance of our business activities. It also provides a common reference framework for the definition of environmental objectives and corporate actions to achieve the results planned by our Environmental Management System.

Thus, at Noatum we assume the following commitments, the fulfilment of which is safeguarded through the implementation and maintenance of our Environmental Management System:

01

Compliance with environmental legislation as well as other voluntary requirements and standards that are assumed as mandatory by the Organisation, and where appropriate, also demand them from contracted companies.

02

Environmental risk management through the adoption of a proactive approach in which preventive measures are taken against the different threats and containment and minimisation measures are adopted for damage that has materialised before the existence of a threat and for the avoidance of new damage in the event that it has already materialised.

03

Continuous improvement of the Environmental Management System based on the philosophy of lifelong improvement, contributes to reducing environmental risks and impacts, considering environmental aspects in all our processes.

04

Environmental protectionto minimise our environmental impact, both in the scope of our activities and in the activities we outsource. We also implement actions such as:

- Adoption of best available techniques whenever and wherever possible.
- The search for efficiency in the use of the resources employed, focusing on energy and water consumption.
- The incorporation of circular economy principles, by means of criteria for the purchase of goods and services and the correct management of productive activities.

05

Actions to address climate change:
we work to reduce the carbon footprint associated with our business activities. To this end, we develop actions such as:

- The promotion of energy efficiency measures in workplaces.
- Plan for the next few years involving self-supply of energy with the installation of photovoltaic systems.
- Improvement in the measurement of the carbon footprint and the medium and long-term planning of actions to reduce and offset the pollutant emissions generated by the company, as well as the services offered to customers.

SCOPE OF APPLICATION AND REACH OF THE POLICY

This Policy has been designed based on standard ISO 14001:2015 and the principles and scope of our Management Policy, within the Integrated Management System. It is also **aligned with the principles set out in our Code of Ethics and responds to the needs and expectations of our stakeholders and the Sustainable Development Goals (SDGs)** adopted in 2015 by the United Nations.

Our policy:

- Applies to all Group companies.
- Is communicated to all persons working for the Organisation and to contracted companies.
- Has been made public through our website and is disseminated internally and externally.

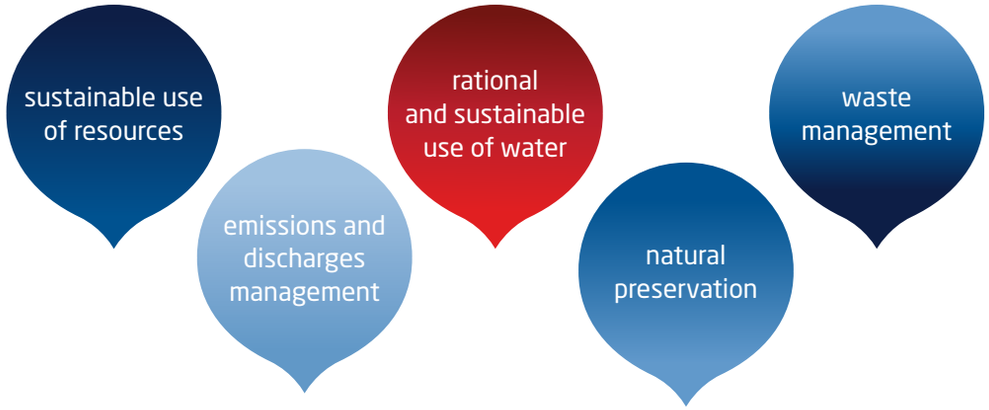


Improvements in our environmental management

Within the framework of our Environmental Management System, we identify all the environmental aspects associated with our activity, both those considered significant and non-significant. For those aspects identified as **significant**, we propose actions to reduce or eliminate environmental impacts.

To further our environmental culture and ensure that the Integrated Management System (which includes our Environmental Management System) is understood and put into practice in our operations, **specific training on the Integrated Management System** was prepared in 2021 for all employees through the new Noatum Corporate University. This training will take place in the first quarter of 2022.

Through our new Corporate University, in 2021 we launched a mandatory **Good Environmental Practices** training course for Spain and other countries where we operate, covering the following topics:



The Guideline for Good Environmental Practices is a support and mentoring document for the Organisation's staff. It shows how to deal with each of the environmental aspects arising from the company's activities, how to reduce, evaluate or eliminate them.

GreeMko

GREEMKO

As an improvement of our Environmental Management System and calculation of our carbon footprint, this year we have **GreeMko, Green Management Technology**, a software that, through digitalisation, automatically captures the information necessary to calculate our environmental indicators and which also allows us to monitor and report the environmental information of all our work centres and companies in an agile and simple way.



Precautionary principle and environmental risk management

As a consequence of the nature of the various activities we carry out, we face a number of potential risks to the environment. This awareness has led us to **implement a procedure within the Environmental Management System that allows us to detect these risks and deal with them appropriately**. Control and monitoring is carried out through a series of indicators.

All Group companies that are certified under the ISO 14001:2015 standard follow the **Procedure for the Identification and Assessment of Environmental Aspects** implemented in the Group. Each work centre has its own identification and assessment of environmental aspects, depending on the activities it carries out, as well as other factors that may condition the presence and relevance of these aspects.

Based on this procedure, environmental aspects are classified according to a number of variables. In this way, we differentiate between:

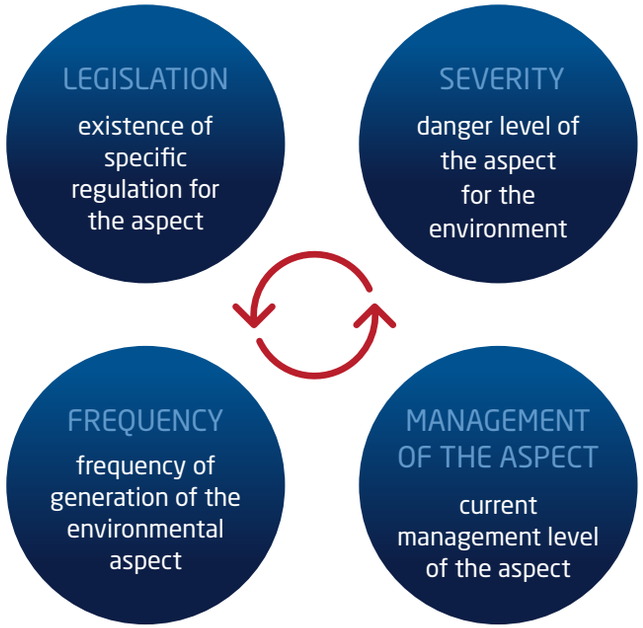
- Direct environmental aspects: linked to the activity itself.
- Indirect environmental aspects: generated by third parties who carry out part of our activity.
- Under normal conditions.
- Under abnormal conditions.
- In emergency situations.

We apply the precautionary principle to situations that may pose a risk to the environment, minimising the negative environmental impact of our operations.



ASSESSMENT

Once the environmental aspects have been identified, their relevance is assessed according to their potential impact on the environment. We have four **valuation criteria** to determine relevance:



Based on the sum of the assessment of each of these criteria, an evaluation of the different environmental aspects is performed. It is drawn up at least once a year.

In addition, the evaluation process takes into account the priority aspect. Through this value we ensure that those aspects that are of particular importance/relevance to our internal and external stakeholders (customers, management, investor group, etc.) are significant in our assessment.

The procedure for the identification and evaluation of environmental aspects allows us to know which aspects have a greater impact on the environment, so that we can establish operational controls to avoid and mitigate said impact.



CONTROL

We implement indicators to monitor those environmental aspects that have been identified as significant in the previous assessment, which allows us to monitor the effectiveness of mitigation actions. The indicators also allow the detection of abnormal values in order to carry out an analysis to determine what might have happened.

In addition, we conduct a **regular assessment of the Organisation's regulatory compliance** including environmental legislation. This procedure prevents us from non-compliance with environmental regulations during the period under evaluation.

Our environmental aspects control system ensures the monitoring, elimination or mitigation of the potential impacts derived from such aspects.

The potential environmental risks identified in 2021 for each business area are set out below:

noatum maritime

Reputational impact of environmental damage.

Generation of an accident, incident or release to the environment with bulk solids.

Risks in tramp and oil&gas inherent to the type of projects developed.

Risks in forwarding/conventional, tramp & oil&gas due to product leakage from a damaged system in isotanks; spills and leaks on oil platforms.

Legal non-compliance.

Environmental risk inherent to the type of loads, in regular line.

noatum logistics

Generation of reputational damage in the event of supplier failure or malpractice and liability towards the customer/ Administration.

Non-compliance with legal requirements associated with the company typology due to the failure to identify and comply with the requirements applicable to the Group companies.

Risk of generating an accident, incident or environmental release

noatum terminals

Generation of releases, spills and uncontrolled discharges.

Consequences of climate change: torrential rains, winds and rising sea levels, which may affect facilities and activity.

Non-compliance with environmental procedures, involving both internal and external staff.

Not having the technical and economic capacity to update processes and machinery to current energy trends and requirements.

Adaptation as an organisation to society's environmental and energy needs and expectations.

Inadequate use of resources (environmental and energy) in operations.

Lack of or low environmental awareness of workers and external staff.

Increased consumption due to incorrect maintenance of facilities and machinery.

More corrective maintenance means greater use of resources. Move towards predictive/ preventive maintenance.

Loss of environmental certifications: ISO 14001, Good Environmental Practices, as well as carrying out the improvements identified in the Quality and Environment system.

Non-compliance with legal requirements entailing risk of sanctions and accidents.

Non-implementation of available technical improvements.

Carrying out investments/projects without taking into account their environmental impact.

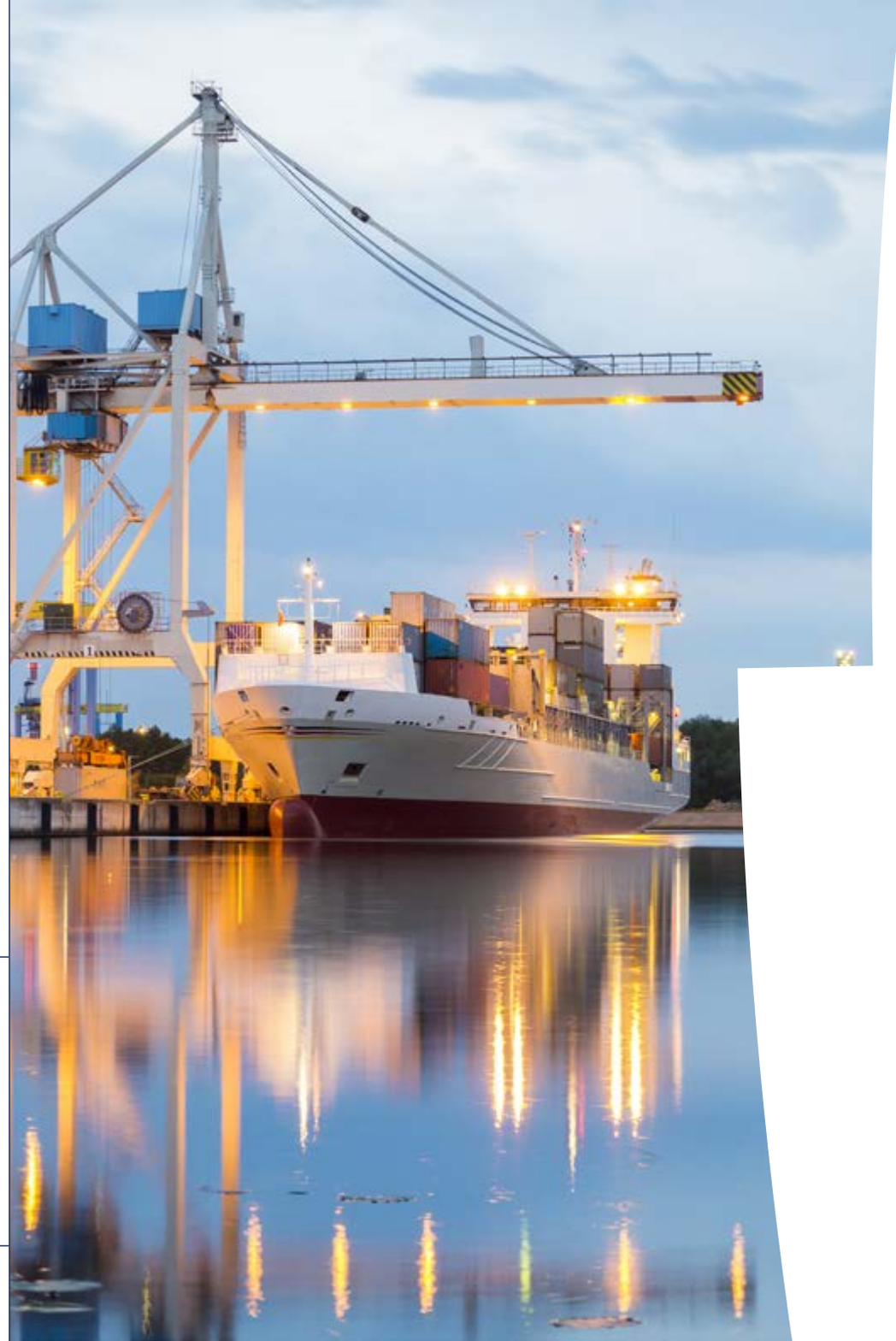
As a complementary measure to the control and mitigation systems, **we insure accidental and environmental pollution risks**, mainly in our port terminals, which are the Group's highest risk activity.

Coverage for **non-accidental pollution** has been insured for a value of **15 million euros per claim per year**. The coverages of these policies include, among other concepts:

- Remediation costs and expenses
- Legal liability
- Liability arising from transport
- Port handling activities
- Agency activities
- Maritime transits
- Warehouse facilities owned by third parties
- Prevention and emergency costs and expenses
- Logistics activities

Our environmental certifications

Standard	Description	Scope
CERTIFIED LR ISO 14001	**Standard ISO 14001:2015** determines the requirements that an Environmental Management System must meet, helping organisations to identify, manage, monitor and control their environmental impacts throughout the organisation and including continuous improvement in the day-to-day Environmental Management System. It is also a fundamental requirement for management to exercise leadership in the performance of the environmental management system.	Our Integrated Management System includes voluntary ISO 14001:2015 certification for the 16 companies located in Spain, France, Chile and Colombia, which represent 38.72% of the Group's sales. For more information, please refer to *Appendix 3.1 List of companies with environmental certifications.*
EMAS	The **European EMAS Regulation (Eco-Management and Audit Scheme)** defines an environmental management scheme based on the ISO 14001 standard. It contains its own requirements that make it a model of excellence for environmental management, obliging the establishment of environmental performance indicators to analyse and measure the efficient use of resources, contribute to minimising risks from a preventive approach, and includes the presentation of Environmental Declarations validated by an independent and accredited verifier.	Our company Autoterminal, S.A. has been EMAS certified since 2004.
CERTIFIED LR ISO 50001	**Standard ISO 50001:2018** aims to maintain and improve an organisation's energy management system, enabling continuous improvement in energy efficiency, energy security, energy use and energy consumption in a systematic approach. This standard enables organisations to continuously improve efficiency, energy-related costs and greenhouse gas emissions.	Noatum Terminal Sagunto, S.L. has had this certification since 2017.



AGREEMENTS RELATING TO GOOD ENVIRONMENTAL PRACTICE WITH PORT AUTHORITIES

In 2021 we have achieved the objective of all our terminals having the agreements relating to the Guidelines for Good Environmental Practices of Puertos del Estado (Spanish State Ports). These agreements provide a common reference framework for all ports, where objectives and investments are set, allowing for the improvement of environmental performance in the port system as a whole.

The terminals of the Group that have signed agreements on Good Environmental Practices with the corresponding Port Authorities are listed below:

- Autoterminal, S.A.
- Noatum Terminal Santander, S.A.U.
- Noatum Terminal Castellón, S.A.
- Noatum Terminal Málaga, S.A.U.
- Noatum Terminal Polivalente Santander, S.L.U.
- Noatum Terminal Sagunto, S.L.
- Noatum Terminal Tarragona, S.A.

7.3. Sustainable use of natural resources



Our commitment to the sustainable use of resources involves encouraging the efficient and responsible use of raw materials, products and energy in all our operations, minimising their consumption as far as possible. This results in improved environmental performance and reduced costs, increasing our competitiveness.

At Noatum, the main consumption linked to our business activity comes from:

- Consumption consumption
- Consumption consumption
- Paper consumption

*electricity and fossil fuels

We monitor these environmental aspects by setting corresponding reduction targets so that each of our delegations can achieve their objectives.

Efficient use of water

Water is an increasingly precious and scarce natural resource. For this reason, we **regularly monitor our water consumption in our workplaces in order to optimise its use**. To this end, in 2021 we acquired software for the monitoring and active management of recorded consumption, making it possible to see the annual evolution of water consumption in the different delegations, as well as a comparison with respect to 2020.

Bearing in mind the responsible use of water, the amount used in our Organisation is limited exclusively to cleaning and sanitary water (ACS/AFS), and **does not intervene in our production processes**, with the exception of the company Autoterminal, which uses this resource for washing vehicles.

The car wash tunnel has a water recirculation system that allows 85% of the total water to be recycled. In addition, this tunnel also has a sludge separator system, as well as a hydrocarbon separator, to pre-treat the water that is discharged into the network.



For its part, the Good Environmental Habits training includes a specific section to raise awareness among our employees regarding the rational and sustainable consumption of water, both in the workplace (offices, warehouses and terminals) and in their domestic environment. This training provides recommendations on good practices in cleaning and hygiene operations, as well as the correct use of sanitary fittings and preventive maintenance of taps and plumbing.

The following table shows the Group's water consumption values according to the type of installation, which largely determines both the volume and uses of the water resource.

Water consumption (m^3)	2021	2020
Water consumption in logistics warehouses	806.45	305.77
Water consumption in offices	29,492.94	12,611.38
Water consumption in port terminals	17,919.87	22,019.00
Total water consumption Group	48,219.26	34,936.15

In 2021, both in offices and warehouses, a significant increase in water consumption can be observed, compared to 2020. This is due to two reasons: a greater presence of employees in the work centres; and, an improvement in the reporting methodology that has allowed for obtaining more accurate consumption data based on the digitalisation of invoices and the use of consumption software.

Responsible paper consumption

Paper is a resource that is consumed every day in the normal course of our administrative activity. Due to the volume used, we consider its use as a significant environmental aspect that we control and strive to minimise.

In this way, we **monitor consumption in all offices** through our environmental management software, analysing variations with respect to previous years and between offices, in order to identify significant deviations and the associated reasons.

We have also implemented sustainable purchasing criteria for this resource:

- **FSC-certified paper** (Forest Stewardship Council) sourced from sustainably managed forests, with management standards that strike a balance between economic, social and environmental friendliness.
- **Totally Chlorine Free (TCF) or Elemental Chlorine Free (ECP) paper**.
- Optionally, other **environmental certifications such as ISO 14001, Ecolabel, etc.**, are available.

In addition, the **paperless project** aims to reduce the use of paper in our offices and to promote the digitalisation of Group information. **Our aim to implement a culture of responsible paper use extends to our stakeholders by including the paperless signature in our emails to raise awareness of responsible paper consumption.** This project, driven by the ESG Committee, applies to all business areas and all organisational levels. In addition, all workstations have dual screens in order to reduce paper consumption associated with day-to-day administrative tasks.

The following table shows the paper consumption by each of the Group's business areas.

	2021			2020		
Paper consumption (1*)	No. Packages (500 Sheets)	No. Sheets	Weight (t)	No. Packages (500 Sheets)	No. Sheets	Weight (t)
Services Corporate (2*)	221	110,500	0.55	Included in business areas	Included in business areas	Included in business areas
Noatum Maritime	2,781	1,390,500	6.94	3,475	1,737,500	8.67
Noatum Logistics (3*)	7,346	3,673,000	18.33	19,989	9,994,250	49.87
Noatum Terminals	1,810	905,000	4.52	1,960	980,000	4.89
Total (t)		**30.34**			**63.43**	

(1*) The paper weight of a DINA4 sheet of paper has been assumed to be 4.99 grams/sheet (Source: DINA4): Soporcel)

(2*) In 2021, it has been decided to report paper consumption by business area and Corporate Services in order to compare the year-on-year variation in consumption of the processes linked to document management carried out there.

(3*) Noatum Logistics' 2020 consumption data does not allow comparability as the consumption measurement methodology used in the UK is not the same as the one used in the 2021 reporting.

In 2021, **paper consumption in all three business areas has decreased** compared to 2020, thanks to the digitalisation processes and paperless measures implemented within the Group.

Efficient use of energy

Noatum's energy consumption comes mainly from fossil fuels and electricity.

The majority of our electricity consumption comes from:

- electricity supply to machinery
- refrigeration equipment
- lighting elements in port terminals
- consumption of air conditioning and lighting equipment in offices and warehouses.

Most of our fuel consumption comes from mobile sources.

We are committed to the consumption of energy from renewable sources, the energy efficiency of our facilities and the progressive reduction in the use of fossil fuels as far as possible.

ENERGY AUDIT

In 2021, we started preparing the Group's **energy audit** for Spain, which will be carried out in the first half of 2022.

This study, in addition to complying with Royal Decree 56/2016, will make it possible to identify **energy saving** and **efficiency measures** for terminals and warehouses, which are the facilities with the highest consumption and the greatest potential for improvement. For this reason, this year we have extended the scope of the audit, above 85% of the total energy consumption of the facilities set by this R.D., including all port terminals and a logistics warehouse.

In addition, this audit will be accompanied by advice from a team of external consultants to **determine emission reduction targets** for the Group over the coming years, based on the results obtained from the audit.

With the definition of these objectives and the conclusions derived from the ESG dual materiality analysis that the Group intends to develop in 2022, Noatum will work to define its decarbonisation strategy. This will allow us to be an active part of the fight against climate change and to adapt to the consequences of climate change, working together with our stakeholders.

OTHER MEASURES

On the other hand, another measure that has been implemented in Noatum Terminal Santander and that will be implemented in the centres with the highest electricity consumption is the **remote metering system** of the meters. This monitoring service makes it possible to identify energy saving opportunities, to have independent consumption information between the distributor and the retailer and, finally, to have centralised control of all consumption points.

In addition, it should be noted that in 2021 Noatum Terminal Sagunto has renewed the certification of its Energy Management System implemented according to the ISO 50001:2018 standard.

These are key measures to collaborate as an Organisation in the global effort to reduce the emission of greenhouse gases responsible for climate change.

A. FOSSIL FUEL CONSUMPTION.

Most of the fuel consumption in our operations comes from the following mobile sources:

- Cranes in port areas (self-propelled cranes, gantry cranes, fixed cranes...).
- Other types of heavy machinery present in terminals (loaders, reachstackers, forklifts, tugmasters...).
- Other auxiliary equipment using fossil fuels (generators, compressors...).
- Passenger cars used for management, commercial staff and port personnel, as well as vans for transporting personnel in port operations.



Some noteworthy measures implemented over the last year:

PLACE - Terminal	Measurement	Achievement
Noatum Terminal Málaga	Use of K-KUBE additivation (NCH Europe).	Injecting this additive into the terminal's tanks reduces diesel consumption by 5% over 100,000 litres of diesel, while also allowing to control contamination, reduce condensation problems and the presence of bacteria in the tanks, and helps prevent engine corrosion.
Autoterminal	Installation of electric chargers for electrified vehicles (pure electric and plug-in hybrids).	Reduction in fossil fuel consumption and emissions in terminal operations.



The following table shows the fuel consumption values by type.

In 2021, fuel consumption is expected to increase compared to 2020 for several reasons. On the one hand, in 2021, new work centres have been identified that use natural gas for the development of their activity, mainly logistics warehouses and the use of propane gas for the propulsion of forklifts inside warehouses. On the other hand, the increase in diesel B consumption is due to an increase in productivity in port terminals using heavy machinery. In addition, the increase in diesel A and petrol consumption is associated with the increase in commercial activity and the number of employee trips compared to 2020, due to mobility restrictions arising from Covid-19.

	2021		2020	
Fuel consumption by type	**kWh***	**litres**	**kWh***	**litres**
Natural gas consumption	73,160.87	-	-	-
Propane gas consumption	1,782.00	-	-	-
Diesel A consumption	4,133,944.64	377,184.73	3,584,595.27	327,061.62
Diesel B consumption	20,796,798.50	1,897,518.11	15,586,928.40	1,422,165.00
Petrol consumption	986,120.15	102,613.96	622,110.16	64,735.73

* The conversion factor of 9.61 kWh/litre has been used for the conversion of litres of petrol and 10.96 kWh/litre for diesel A-B. SOURCE: EAUC (The Environmental Association for Universities and Colleges)

Likewise, the fuel consumption values are presented in detail by business area.

Fuel consumption by business area		**2021**	**2020**
Corporate services	Diesel A consumption (litres)	**2,051.49**	**1,240.3**
	Petrol consumption (litres)	668.52	1,054.39
Noatum Logistics	Natural gas consumption (kwh)	73,160.87	-
	Propane gas consumption (kwh)	1,782	-
	Diesel A consumption (litres)	154,806.63	121,378.82
	Petrol consumption (litres)	80,477.76	33,938.01
Noatum Maritime	Diesel A consumption (litres)	103,878.10	71,164.09
	Petrol consumption (litres)	7,997.92	14,073.48
Noatum Terminals	Diesel A consumption (litres)	116,448.51	118,501.71
	Diesel B consumption (litres)	1,897,518.11	1,422,165.00
	Petrol consumption (litres)	13,469.76	25,370.58

B. ELECTRICITY CONSUMPTION

Efficiency measures in electricity consumption include the following:

> The design of facilities with eco-efficiency criteria, such as our warehouses located in port enclosures and logistics warehouses in Spain.

> The replacement of conventional lighting elements with LED technology lamps. This initiative, promoted by the ESG committee, has led to an investment in 2021 of more than 98,000 euros in our terminals.

In addition, **more than 77% of the electrical energy consumed by Noatum in 2021 comes from renewable energy sources** and, therefore, the CO_2 emissions generated indirectly are zero, thus contributing to reducing our global carbon footprint.

Finally, one of the pillars on which our sustainability strategy will hinge is decarbonisation, which will require us to progressively implement **energy self-consumption** measures. In 2021, work began to develop analyses of the implementation of photovoltaic panels on terminals for self-consumption in offices and equipment and machinery with lower energy demand.

The following table shows the Group's electricity consumption by type of installation.

Electricity consumption by type of installation (kWh)	2021	2020
Logistics warehouses	681,288.26	456,043.59
Offices	3,162,673.74	3,491,802.71
Port terminals	7,633,484.03	6,954,867.36
Total	**11,477,446.03**	**10,902,713.66**

In 2021, electricity consumption has increased compared to 2020, due to increased production activity in terminals and logistics warehouses. Our terminals are the Group's largest centres of energy consumption, and an evolution of their electricity consumption is shown in *Appendix 3.5. Electricity consumption.*







7.4. Our commitment to the circular economy

At Noatum we understand the circular economy as a system for making the most of resources in which the reduction, reuse and recycling of resources is a priority, promoting their optimisation, the sustainable consumption of raw materials and the responsible management of our waste.

Responsible waste management

Our activity generates waste of different types and we ensure that it is managed in a sustainable and responsible manner.

For waste management in offices, warehouses and terminals, we have a number of **waste managers** who are approved by the Group. These suppliers hold all the authorisations required by current legislation, as well as the necessary permits for the management of specific waste, such as hazardous waste or the destruction of confidential documentation.

On the other hand, due to our business activity, food waste is not significant and therefore the prevention of food waste within the Group has not been considered as a material aspect. However, in all our coffee corners and canteens where this type of waste is generated, there are marked containers for its correct separation.

ELIMINATION OF SINGLE-USE PLASTICS IN OUR OFFICES

The most significant waste generated in our offices is paper, cardboard and plastic.

With regard to plastic waste, the exponential increase in plastic waste on the planet, especially single-use plastic waste, is generating growing concern and worry among society. The tangible degradation of aquatic ecosystems, mainly marine ecosystems, linked to the presence of plastics and other petroleum derivatives, causes an affectation and destruction of flora and fauna, as well as an alteration of the physical-chemical characteristics of the water. This progressive degeneration generates irreversible situations such as the disappearance of species and ecosystems of high ecological value.

The elimination of plastics from our offices is one of the objectives set by the ESG Committee, showing its commitment by monitoring the actions taken and allocating the necessary resources to achieve this goal.

We are aware of and sensitive to this issue, especially because of our relationship with maritime activities. For this reason, **since 2019 we have been implementing a series of measures aimed at eliminating plastics from water, coffee and canteen supplies in our offices**.



Actions to be highlighted in 2021:

- The use of water machines for stevedoring personnel is being implemented in different terminals to reduce the presence of plastic in the vicinity of the quay and to prevent this plastic from ending up in the sea.
- At the end of 2021 we approved the purchase of a **corporate reusable bottle** to be distributed in 2022.
- Some of our delegations are asking their office cleaning suppliers for their **products to be labelled ECOLABEL** and/or environmentally friendly.

WASTE MANAGEMENT IN PORT TERMINALS

Industrial and operational activities are carried out in our port terminals, which are associated with a specific generation of waste, in some cases a very significant aspect both in terms of the volume generated and its categorisation as hazardous waste. This is why we make sure that they are properly segregated and stored in designated areas.

At all our terminals there is a **collection point** with the required technical and constructive characteristics, paying special attention to the maintenance, cleaning and signposting of the containers and receptacles used to store waste. These areas are equipped with emergency spill kits and are supervised by the safety advisor, who provides the necessary instructions and training to workers involved in the management and handling of hazardous waste.

This waste is handed over to the **authorised waste manager**, promoting a management focused on its recovery.

On the other hand, with regard to non-hazardous waste, terminal activity mainly generates waste associated with bulk handling, such as sand and clay, and banal waste derived from packaging, such as plastics and wood, among others.



WASTE GENERATED

The 2020-2021 evolution of hazardous and non-hazardous waste generated in our offices, logistics warehouses and port facilities is presented below. It is important to note that the reporting of waste is limited to the Spanish delegations certified under the ISO 14001:2015 scheme and included in the Integrated Management System. For future years, waste from those international delegations that are certified under standard ISO 14001:2015 will be reported.

Waste in offices and logistics warehouses

The following tables show the 2020-2021 evolution of hazardous and non-hazardous waste generated in our offices and logistics warehouses.

HAZARDOUS WASTE GENERATED IN OFFICES AND LOGISTICS WAREHOUSES IN SPAIN* (kg)	2021	2020
Electrical and electronic equipment	45	2
Alkaline batteries	3	6
Toner**	-	9
General total	**48**	**17**

* The figures presented are limited to workplaces located in Spain.
** The toner waste becomes non-hazardous according to the specifications indicated by the supplier.

In 2021, the generation of hazardous waste has increased compared to 2020 mainly due to the removal of obsolete and damaged electrical and electronic equipment.

NON-HAZARDOUS WASTE GENERATED IN OFFICES AND LOGISTICS WAREHOUSES IN SPAIN (kg)	2021			2020		
	Total	Offices	Warehouses	Total	Offices	Warehouses
Paper / Cardboard	7,272	1,792	5,480	121	121	-*
Ink and toner cartridges	7	-	-	-	-	-
Plastic	1,946	306	1,640	111	111	-
Bulky waste	5,500	-	-	-*	-*	-*

* In 2020 only office waste, related to the removal of paper, cardboard and plastic, was reported.

In 2021, 1,946 kg of plastic waste was generated, 15.6% in our offices and 84.4% in our logistics warehouses. Compared to 2020, the generation of plastic in offices (from 111 kg to 306 kg) has increased due to the increased presence of workers. Work will continue with the aim of **reducing dependence on single-use plastics, with the implementation of actions such as the purchase of a reusable corporate bottle as of 2022, training and awareness-raising actions or the establishment of plastic consumption reduction targets in the delegations**.

Similarly, paper and board consumption has increased significantly compared to 2020, an extraordinary year due to the Covid-19 pandemic, but well below the 2018-2019 trend. Paperless measures and staff awareness-raising and training actions are expected to confirm a downward trend in paper consumption over the coming years.

Waste in port facilities*

With reference to the waste generated in this type of facility and represented in the following table, it should be noted that the decrease in the generation of hazardous waste in 2021 is due, on the one hand, to the fact that this year there has been less collection of oily water from oil/water separators (last year 17.4 tonnes of this waste was generated compared to 5.14 tonnes in 2021) and to a lower generation of contaminated absorbents, from 11.16 tonnes in 2020 to 8.15 tonnes in 2021.

On the other hand, the generation of non-hazardous waste, from food and aggregates operations, has doubled compared to those recorded in 2020 but is in line with the figures recorded in 2019.

WASTE GENERATED IN PORT FACILITIES (kg)	2021	2020
Hazardous waste	41,214.31	61,019.00
Non-hazardous waste	2,576,812.11	1,024,275.00

* This includes all the Group's dependent terminals and Marítima del Mediterráneo's aggregates warehouse located in Castellón.

Details of waste quantities by type, category and LER code are given in *Appendix 3.6 Responsible Waste Management.*

7.5. Fight against climate change

We take a number of measures to reduce our carbon footprint in the scope of our activities

Climate change is a global problem that reaches into environmental, political, economic and social perspectives. To minimise its consequences, all organisations must act to progressively and substantially reduce greenhouse gas (GHG) emissions and dependence on fossil fuels.

The electricity consumed at our work centres in Spain comes from retailers with 100% Guarantee of Origin certification, thus guaranteeing that the energy consumed is generated from renewable energy sources, and therefore, its emission factor is zero. We also promote the electrification of transport by installing chargers for electrified vehicles in different branches in Spain, together with the progressive renewal of our vehicle fleet.



The improvements implemented in internal consumption reporting allow us, for the first time, to report our scope 3 carbon footprint.

In addition, in 2021 we improved our internal reporting system for consumption, as well as transparency in the calculation of our carbon footprint through the implementation of Greemko software, which allows for improved environmental management and calculation of the carbon footprint as an element of differentiation compared to competitors.

The measurement and subsequent analysis of our carbon footprint will allow us to take concrete actions to reduce our impact on climate change.

In order to quantify the greenhouse gas emissions generated in our activity, we use our environmental management software to estimate the annual amount of tonnes of CO_2 equivalent emitted and linked to:



SCOPE 1

Direct GHG emissions associated with fossil fuel consumption.

In terminals they originate mainly from heavy machinery and vehicles present in the workplaces: cranes in the port areas (self-propelled cranes, gantry cranes, fixed cranes), loaders, reachstackers, forklifts and, to a lesser extent, mobile sources (leased passenger cars used for management, sales and staff).

In the case of the Noatum Maritime and Noatum Logistics business areas, Scope 1 emissions originate mainly from the use of leased passenger cars.

SCOPE 2

Indirect GHG emissions associated with the electricity consumption of the buildings of the three business areas and of the machinery and work equipment connected to the grid in port terminals.

SCOPE 3

Emissions from business travel, including air, rail, car rental and hotel stays.

We also provide Scope 3 emissions associated with our supply chain for customers who request it, taking into account the multimodality of their shipments and the routes used, as well as the type of goods or vehicle used.

The following **emission factors** have been used to determine the CO_2 equivalent emissions:

SCOPE 1

The emission factors provided by the Spanish Ministry of Ecological Transition (MITECO), updated to 2020, have been used for all regions.

SCOPE 2

In Spain, the calculation has been carried out using both the market-based method (depending on the energy supplier) and the location-based method. For both methods, emission factors provided by the Spanish Ministry of Ecological Transition (MITECO), updated to 2021, have been used.

For the remaining regions, the location-based method has been used, using different sources to determine the emission factor associated with each country's energy mix.

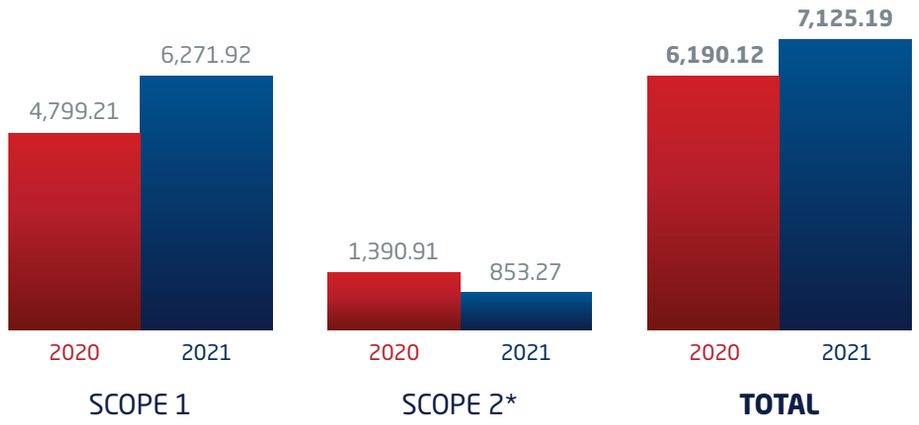
SCOPE 3

The supplier providing the Scope 3 carbon footprint data uses the emission factors provided by DEFRA (Department for Environment, Food & Rural Affairs) as emission factors. GOV. UK)



The following graph shows the 2020-2021 evolution of the Noatum Group's GHG Scope 1 and 2 emissions for the entire Noatum Group.

GHG EMISSIONS (tCO_2eq)



* For the calculation of scope 2 GHG emissions, the market-based method has been used for Spain and the location-based method for the rest of the countries.

The increase in Scope 1 emissions in 2021 is due, on the one hand, to the increase in productivity in port facilities, which is associated with an increase in hydrocarbon consumption by heavy machinery used in port operations.

On the other hand, in 2021 there was greater mobility of passenger cars in the Group's leasing fleet, due to the absence of mobility restrictions due to the Covid-19 pandemic, unlike in 2020.

With regard to the reduction of Scope 2 emissions (electricity consumption), this is due to the fact that all the energy consumed in Spain throughout 2021 comes from renewable energy sources and, therefore, its emission factor is 0. In 2020, until May the emission factor was different from 0, at which time a contract was signed with a retailer with a Guarantee of Origin certificate.

In Appendix 3.7. Greenhouse gas emissions (carbon footprint), the **Scope 2 Carbon Footprint is calculated based on two calculation scenarios**:

SCENARIO 1

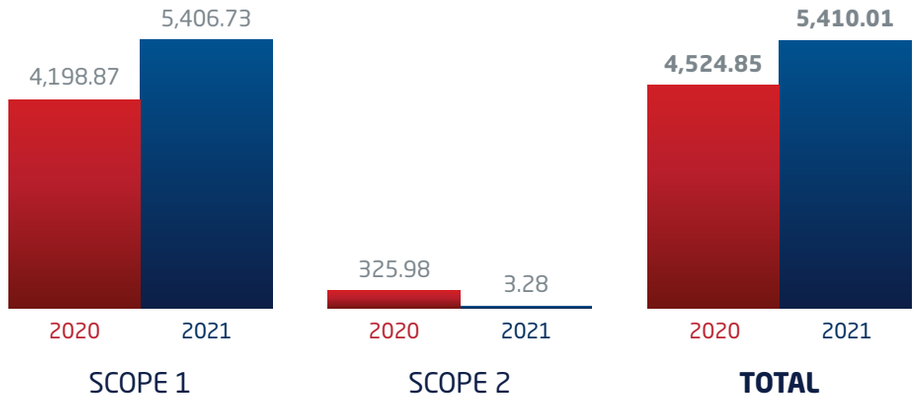
Indicated above, using the market-based method for Spain and the location-based method for the remaining countries).

SCENARIO 2

Applying the location-based method for all countries.

The following graph shows the 2020-2021 evolution of GHG emissions from port terminals, which are the largest centres of energy consumption within the organisation.

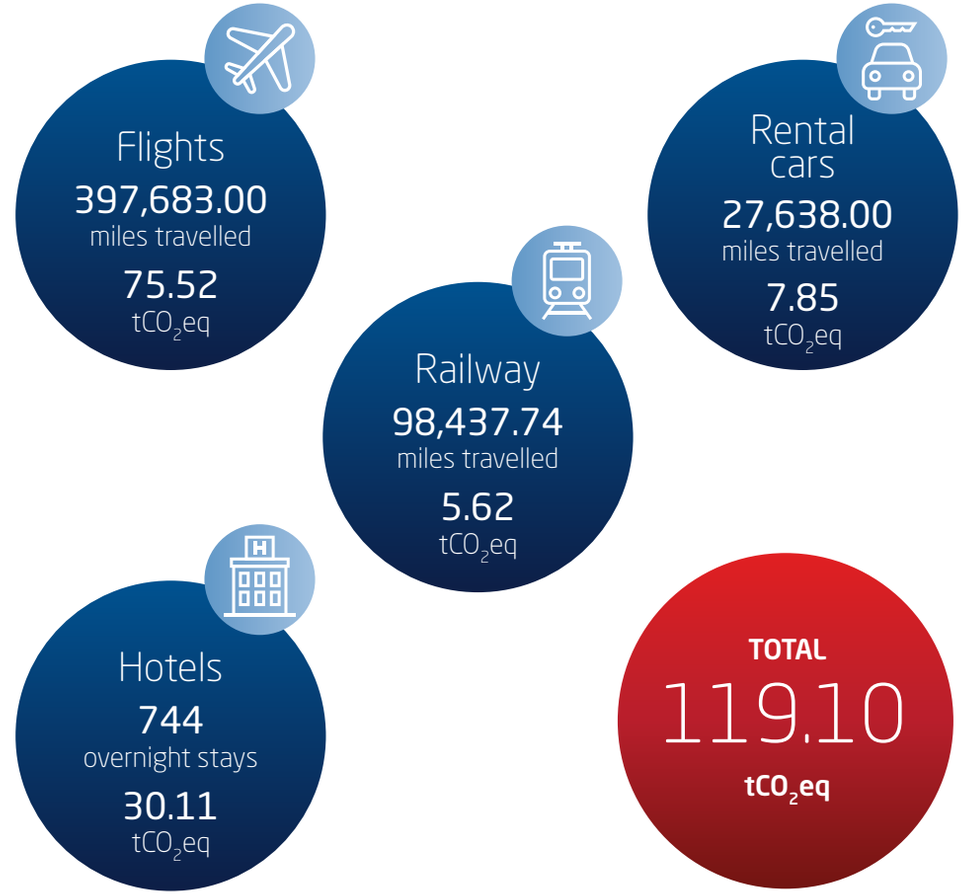
GHG EMISSIONS (tCO_2eq) FROM PORT TERMINALS*



* In Appendix 3.7. Greenhouse gas emissions (carbon footprint) reflects the GHG emissions generated by each of the terminals.

This year, we want to take a step forward in the transparency of our environmental footprint. For this reason, we offer our carbon footprint linked to the Group's business travel of the Spanish delegations during the 2021 financial year. Our scope 3 carbon footprint can be found in the table below:

GHG EMISSIONS - SCOPE 3 (tCO_2eq)



7.6. Minimisation of air pollution

The handling of **powdery material** in bulk solids operations in our warehouses and port terminals can occasionally generate high concentrations of dust in suspension. These operations must be controlled, monitoring their correct execution, in order to prevent possible effects on the health and safety of our workers, as well as on the port community as a whole.

To reduce these emissions, our terminals follow the good practices guidelines for bulk handling published by the port authorities.

Some of the **technical and organisational measures** carried out in these operations are:

Control over vehicles and machinery, which must drive at the established speed, with tarpaulins and other elements installed to prevent the dispersion of the transported material.

Periodic cleaning of roads and machinery is carried out as specified in the terminal cleaning plans, and spilled bulk is collected at the end of operations.

In the loading/unloading processes, **the free fall height of the material** from the bucket to the hold/lorry/hopper **is reduced** and tarpaulins are installed between the ship and the dock to catch the bulk spilled by the bucket, preventing it from falling into the sea. In addition, some terminals have ecological or semi-ecological hoppers.

Actions implemented in 2021 - Hoppers

NOATUM SANTANDER MULTI-PURPOSE TERMINAL

An investment of 15,000 euros was made for the conditioning and modification of the hoppers in order to reduce suspended particles.

NOATUM TERMINAL MÁLAGA

A new hopper with a capacity of 180 tonnes was purchased with a product discharge system between the vehicle and the inner chamber, which greatly reduces the emission of dust to the external environment.

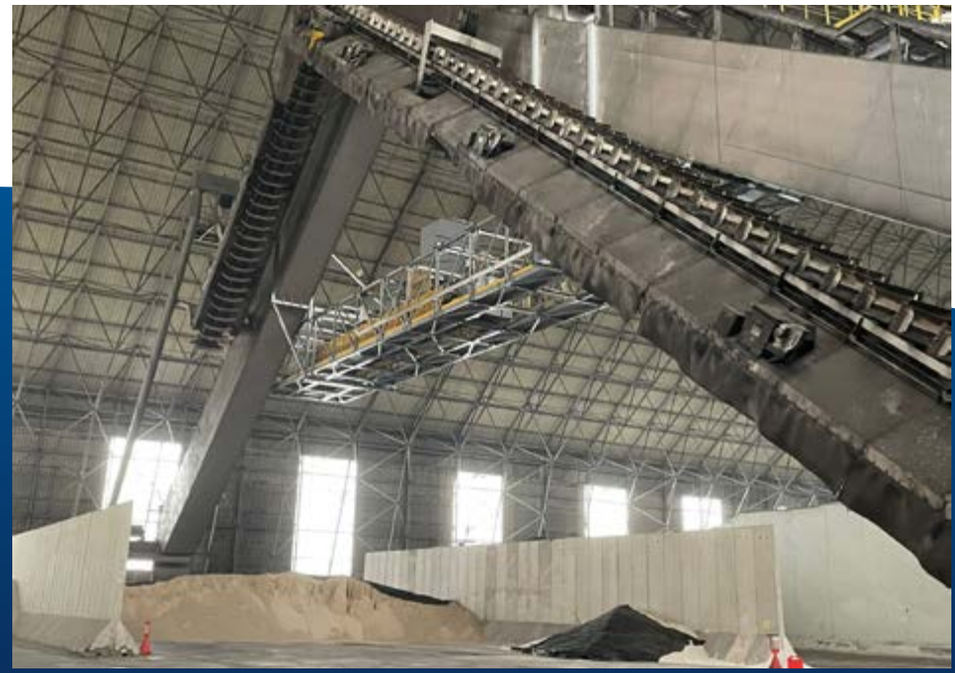
In addition, it has an ecological system called Flex-Flap that avoids emitting the highest percentage of dust in suspension in the process of unloading the product from the ship to the hopper with a port crane.



In the storage phase, as far as possible, **open-air storage is** progressively **avoided** in favour of enclosed sheds with slatted curtains at the gates to prevent emissions to the external environment. In reference to this point, in the course of 2021 Noatum Terminal Málaga has built four concrete warehouses for bulk storage, which results in less dust and dirt generation compared to the use of the previous tents.

On the other hand, **our NOx and SOx emissions are not significant**, which is why they are not included in the report. Furthermore, due to our activity and location, we consider that we do not have a significant impact on **light and noise pollution**.







7.7.
Biodiversity protection

The operations carried out in our port terminals are the ones that can generate the greatest impact in terms of affecting biodiversity, as there is a risk of spills of hazardous chemical products (fuels, lubricants) or spills of goods into the sea. To minimise this risk, **all technical, organisational and operational measures are put in place to ensure that this risk does not materialise**.

In addition, the Port Authorities publish in their Sustainability Reports the actions and protection measures they carry out to preserve protected environments or environments with biosphere value.

In any case, our terminals follow the recommendations and guidelines set by the environmental departments of the Port Authorities who lead the biodiversity protection projects in which we collaborate and participate whenever possible.

8
WE GENERATE SHARED VALUE IN SOCIETY



We have a responsibility to
create shared value:

We want to be agents of change to improve the environment in which we operate.

We promote the development of local communities and society in general.

We strive to minimise our environmental impact.

8.1. Committed to local development

Noatum is **committed to improving its impact on society**.

Our commitment to local development is based on actions that **maximise the value that our activities and services bring** to the environment.

This approach allows us to align our objectives as an organisation with the priorities of our stakeholders and to strengthen our activities and services in the communities where we operate, as we believe that local buy-in is essential for long-term business sustainability. We build a **business model integrated with society by creating sustainable and profitable solutions, solving social needs and generating mutually beneficial solutions, leaving no one behind**.



We integrate our ESG (environmental, social and governance) approach into our supply chain with full transparency, seeking excellence in management and the generation of shared value.

8.2. Responsible management of our supply chain

> We extend our standards to our business partners through the accreditation process and require them, among other things, to adhere to our Code of Ethics.

In 2021 we have integrated our environmental commitments into our supply chain and have required our suppliers to adhere to our environmental policy and meet our environmental requirements.



We take the following actions to manage our suppliers and ensure the quality of the services they provide:

Accreditation of suppliers	The procedure implemented in Spain makes it possible to **determine the suitability and training of the supplier for the provision of the service** in accordance with compliance with the applicable legal regulations and the requirements established by the Organisation. The accreditation procedures applied in the other Noatum geographies and companies are being analysed as part of the Group's integration and consolidation strategy.	In order to minimise risk exposure and ensure compliance with legal and regulatory requirements, as well as other requirements set by the Group for the supply chain, the supplier accreditation process applicable in Spain involves accepting our standards and requesting **adherence to the following Noatum Group's policies and Code of Ethics**: • Health and Safety Policy • Environmental Policy • Privacy Policy • Code of Ethics In addition, they are asked if they have any **quality, environmental or corporate social responsibility certifications**. Since 2021, they are also required to download, sign and attach the **environmental commitment** document on our accreditation platform. In the event of subcontracting, the information and documentation requested, as well as the commitments made, must be passed on throughout the supply chain.
Audits		We reserve the right to carry out service quality audits of our suppliers in order to lay the foundations for an appropriate partnership commitment. No second party audits (external stakeholders) have been carried out in 2021.
Demands on suppliers		Within the framework of corporate social responsibility, we have established the criteria by which we are governed, which we pass on to our suppliers by means of the Code of Ethics and other relevant documentation.

In Spain, the accreditation process is part of the supplier training phase, which is mandatory when suppliers are contracted to provide a service.

PHASES OF THE SUPPLIER TRAINING PROCESS



Based on the internal or external customer's needs, the database of accredited suppliers is searched. In cases where there is no accredited supplier, the accreditation process is used.

In 2021, new companies have been incorporated into the accreditation process, therefore this process is currently applied in 16 companies across Spain. The corporate scope of this process can be found in Appendix 4. *Scope of the supplier accreditation process in Spain in 2021.*

Supplier preparation training

In 2021, a course on the training process, including third party management, supplier accreditation and coordination of business activities, was completed in Spain. This training is the result of the working group formed between the Group's Business and Corporate Services divisions over the past year. In 2022, we plan to include this course into the training package for new employees joining the Group.

Supplier assessment

In order to ensure responsible management of our supply chain, in 2021 a total of 456 suppliers accepted and signed our Code of Ethics and our corporate policies. In this way, we ensure that they work to our environmental and social standards.

To date, **we have not identified any relevant negative environmental impacts** in the supply chain: no suppliers with potential or actual negative environmental impacts have been identified and no suppliers have been terminated as a result of this assessment.

At Noatum, no suppliers have been identified whose right to **collective bargaining** and **freedom of association** may be at risk, nor suppliers with a significant risk of **forced or compulsory labour**.

On the other hand, **we have not identified any relevant negative social impacts in the supply chain**.

8.3. Volunteer collaborations

In addition to contributing economic and strategic development value to the communities in which we operate, it **is a priority forNoatum to generate a sustainable culture that favours and promotes both internal initiatives and collaborative actions with our stakeholders**, with the aim of adding value, reducing inequalities and improving the situation of the most disadvantaged groups.

FINANCIAL DONATIONS MADE IN 2021 BY NOATUM

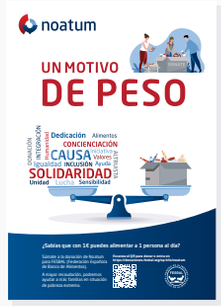
Contribution to foundations and non-profit organisations

(euros)



No sponsorship actions have been carried out during 2021.

In 2021 we carried out the following volunteer collaborations:

International	Region	What we have done
Addeco Foundation	Spain	We have developed various initiatives to contribute to the labour insertion and job creation of people with disabilities. In this way, we comply with the General Law on the Rights of Persons with Disabilities and their Social Inclusion.
Spanish Federation of Food Banks (FESBAL) 	Spain	We joined FESBAL in the fight against poverty and food waste. **"Un motivo de peso" (A compelling reason):** With our campaign, the Group made a financial donation, which enabled: • the purchase of 7,500 kg of basic foodstuffs • to support 3,400 families in one day As in the previous campaign, a virtual space was created on the FESBAL website for employees to make a personal financial donation. We are grateful for the collaboration and support of Noatum employees who have taken part in this initiative, a sign of their solidarity and social awareness.
Médecins Sans Frontières 	Spain	On the occasion of the tenth edition of Noatum's traditional children's Christmas card competition, for each drawing received, the Group made a donation to Médecins Sans Frontières. This NGO dedicates the funds to meet the most basic needs of the people in need in areas such as medical care, as well as ensuring clean water and sanitation infrastructure.
TEMA Foundation	Turkey	Following the devastating forest fires that ravaged Turkey in the summer of 2021, which caused almost complete destruction of the flora and fauna of these sites, our colleagues in Turkey wanted to do their bit to help recover and restore these ecosystems. The contribution took the form of a donation to the Tema Foundation in Turkey, which has enabled the reforestation of 10,000 seedlings.

8.4.
Participation in associations

We proactively participate in different forums and associations. Participation in this type of organisations allows us to interact with the main agents of change to generate shared value between the company and its environment, to learn and share good practices, and to strengthen our relationships with stakeholders. It also provides us with visibility and greater knowledge of the markets and sectors in which we operate and facilitates synergies with operators in the logistics chain.



noatum maritime

International	• Maritime Anti-Corruption Network (MACN) Noatum is a member of this global business network, which works for a corruption-free maritime industry that enables fair trade for the benefit of society. All members are committed to implementing MACN's anti-corruption principles, based on international regulatory reference standards. • International Association of Independent Tanker Owners • Cruise Lines International Association (CLIA) • Baltic International Maritime Council (BIMCO)
Spain	• Asociación Española de Consignatarios de Buques (ASECOB) We are involved with several associations throughout Spain, in which Noatum Maritime is present as a shipping agent. Through ASECOB we also participate in: • European Community Association of Ship Brokers and Agents (ECASBA) • Federation of National Associations of Ship Brokers and Agents (FONASBA)
Portugal	• Agentes de Navegaçao de Portugal (AGEPOR) • Camara de Comercio e Industria Luso Espanhola (CCIL) • Angolan Chamber of Commerce and Industry
France	• Association des Agents Consignataires des Navires (AACN) • Union Maritime Fluvial (UMF) • Union Maritime Port de Sète (UMPS) • Groupement Havrais des Armateurs et Agents Maritime (GHAAM) • Union Maritime de la Rochelle • Syndicat des Armateurs Bordeaux • Association des Agents Consignataires des Ports de La Rochelle (AACPLR)

noatum logistics

Spain	• Federación Española de Transitarios-Expedidores Internacionales y Asimilados (FETEIA) Organisation for logistics, transport and customs representation. Through it, we are also associated with the International Federation of Freight Forwarders Associates (FIATA).
Portugal	• Associaçao dos Transitários de Portugal (APAT) • Luso-British Chamber of Commerce • Luso-Arab Chamber of Commerce
Turkey	• Association of International Forwarding and Logistics Service Providers (UTIKAD) • Deniz Ticaret Odası (Turkish Chamber of Shipping) • Istanbul Ticaret Odası (Istanbul Chamber of Commerce) - Hizmet Ihracatçıları Birligi (Association of Service Exporters)
Peru	• Asociación Peruana de Agentes de Carga Internacional (APACIT)
Hong Kong	• Spanish Chamber of Commerce in Hong Kong

noatum terminals

Spain	• Asociación Estatal de Empresas Operadoras Portuarias (ASOPORT) • Asociación Nacional de Empresas Estibadores y Centro Portuarios de Empleo (ANESCO) • Asociación Española de Almacenistas Portuarias de Granos, Cereales y sus Derivados (UNISTOCK) • Confederación Española de Organizaciones Empresariales (CEOE) • Club EMAS • FERRMED, ASBL
Barcelona	• Asociación de Empresas Estibadoras • Asociación Profesional de Expertos Contables
Tarragona	• Asociación Provincial de Empresas Estibadoras • Confederación Empresarial de la Provincia de Tarragona • Agrupación para la promoción del Port de Tarragona (APPORTT)
Castellón	• Propeller Club Castellón, forum for maritime and logistics promorion
Sagunto	• Asociación Naviera Valenciana (ANV), association of maritime traffic companies in the province of Valencia
Málaga	• Málagaport: Associated Company of the Port Authority of Malaga responsible for the promotion of the port of Malaga • Asociación de Consignatarios de Buques, Estibadoras y Agentes de Aduanas de Málaga
Santander	• Asociación de Consignatarios y Estibadores de Buques en el Puerto de Santander (ASCOESANT) • Asociación Profesional de Representantes Aduaneros de Cantabria (ADUCANT)

8.5. Fiscal transparency

Our commitment to the territories in which we operate is also reflected through our responsible fiscal management, including compliance with the relevant financial and tax obligations.

We comply with tax regulations, in accordance with the principles that inspire the company's corporate responsibility, we apply responsible tax policies and **promote cooperative and transparent relations with the tax authorities**.

TAX INFORMATION BY COUNTRY* (EURO)

	2021		2020	
Countries	**Benefits**	**Income tax**	**Benefits**	**Income tax**
Argentina**	-388,000.00	-	-	-
Chile	1,407,000.00	-	134,060.29	2,894.26
China	5,074,000.00	1,144,000.00	2,158,584.54	-420,407.72
Colombia	706,000.00	45,000.00	394,969.57	438,454.56
Spain	3,892,000.00	2,057,000.00	-11,906,873.80	-451,852.61
United States	-3,178,000.00	46,000.00	-5,164,926.15	-127,030.87
France	924,000.00	-	80,913.83	-
Hong Kong	-273,000.00	244,000.00	577,504.87	-95,719.54
Indonesia	807,000.00	1,000.00	-36,262.74	-293.7
Mexico	50,000.00	-	-18,989.38	-14,222.85
Peru	161,000.00	-283,000.00	-3,252,240.82	-727,955.66
Portugal	1,713,000.00	1,000.00	-261,709.38	-
United Kingdom	-1,904,000.00	-	353,970.90	-62,126.56
Singapore	215,000.00	9,000.00	84,935.98	-
Taiwan	461,000.00	78,000.00	289,996.28	-47,523.55
Turkey	22,489,000.00	8,629,000.00	1,241,222.32	-1,504,994.31
TOTAL	**32,156,000.00**	**11,971,000.00**	**-15,324,843.69**	**-3,010,778.55**

*The profit reporting criteria used takes into account the net profit or loss from transactions in Group companies. With regard to profit, any payment (-) or collection related to corporate income tax that has been made with the tax authority in the different countries is taken into account.

**This company has been included in the scope of 2021 NFIS this year.

Noatum has not received any public subsidies in 2020 or 2021.

9
ABOUT THIS REPORT

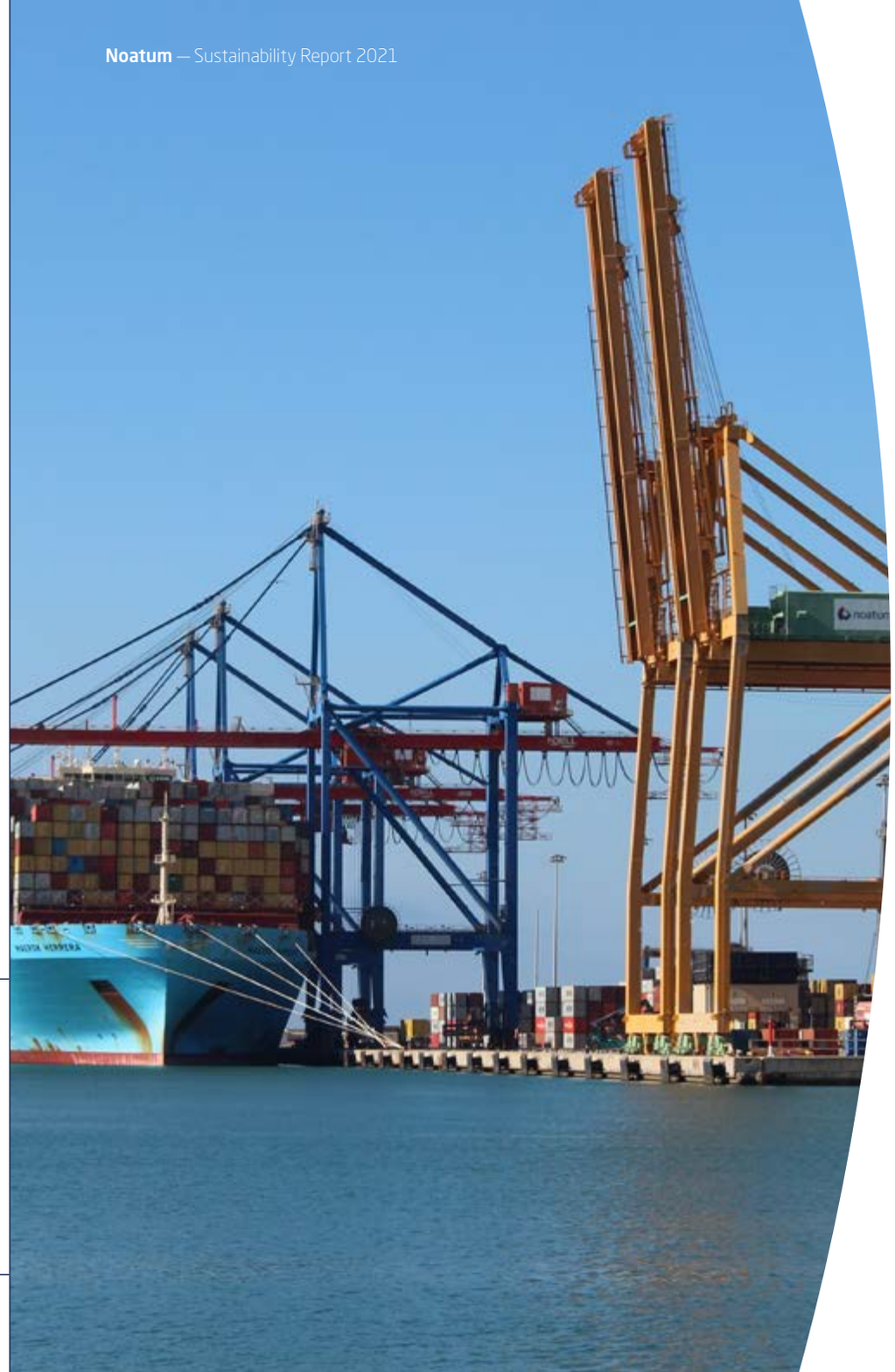
This non-financial information statement has been prepared to comply with the requirements established in Law 11/2018, of 28 December, amending the Code of Commerce, the revised text of the Capital Companies Act approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Account Auditing, in relation to non-financial information and diversity. The report is also presented as the Group's sustainability report.

The report provides the information necessary to understand the development, performance and position of the Noatum Group and the impact of its activities with respect to environmental, social and economic issues from 1 January 2021 to 31 December 2021. In its preparation, consideration has been given to the Guidelines on the presentation of non-financial reports issued by the European Commission (2017/C 215/01) arising from Directive 2014/95/EU and the provisions laid down in the Global Reporting Initiative Standards (GRI Standards). The report is a reflection of the importance Noatum attaches to its stakeholders and its commitment to sustainability, in order to ensure that the Group's economic activity is aligned with the basic principles for sustainable social and environmental development over time.

The preparation of this report is not only a clear exercise in transparency and accountability, but also contributes to improving the Group's own management processes and strategy by identifying new opportunities for improvement that can be realised in the short and medium terms.

The scope of this report coincides with that of the financial statements, with the exception of the non-financial indicators, the perimeter of which represents 92.33% of the workforce and 95.60% of the Group's sales in terms of staff, as can be seen in Appendix 1: "Scope of the report".

All information required by Law 11/2018 and included in the table of contents required by Law 11/2018 has been reviewed by an independent verification service provider.



9.1. Process of defining relevant issues (materiality)

According to the GRI Standards, materiality analysis is a method for identifying the most important aspects for stakeholders and for detecting the issues that determine the capacity to generate value from a social, environmental and economic point of view.

Noatum's materiality is determined by the aspects of the organisation that are considered most relevant. Thus, the defined aspects reflect the sustainability priorities and help to identify the issues on which the organisation should focus its efforts, as well as the actions to generate a positive contribution.

Thus, the analysis of the relevant and priority issues for the organisation allows to:

Know the importance of the issues related to the business strategy and determine the expectations and needs of the stakeholders.

Focus efforts on managing economic, environmental, social and governance issues that maximise our contribution to sustainable development.

The material aspects identified have been structured into six areas: corporate governance, environment, labour, social, customers and economic. The report addresses each of these issues in detail.

Scope	Material aspects	Contribution to the SDGs
Corporate governance	Transparency, ethics and integrity Risk management Corruption and bribery Regulatory compliance Company cohesion in the context of a global pandemic	16 PAZ, JUSTICIA E INSTITUCIONES SÓLIDAS; 8 TRABAJO DECENTE Y CRECIMIENTO ECONÓMICO; 10 REDUCCIÓN DE LAS DESIGUALDADES
Environment	Energy consumption and efficiency Contamination Circular economy Climate change	7 ENERGÍA ASEQUIBLE Y NO CONTAMINANTE; 12 PRODUCCIÓN Y CONSUMO RESPONSABLES; 13 ACCIÓN POR EL CLIMA; 14 VIDA SUBMARINA
Labour	Health and safety of employees Work-life balance Equality and diversity Training and talent retention Human rights	3 SALUD Y BIENESTAR; 5 IGUALDAD DE GÉNERO; 8 TRABAJO DECENTE Y CRECIMIENTO ECONÓMICO; 10 REDUCCIÓN DE LAS DESIGUALDADES
Social	Social commitment	3 SALUD Y BIENESTAR; 5 IGUALDAD DE GÉNERO; 8 TRABAJO DECE Y CRECIMIENTO ECONÓMICO; 10 REDUCCIÓN DE LAS DESIGUALDADES; 11 CIUDADES Y COMUNIDADES SOSTENIBLES; 17 ALIANZAS PARA LOGRAR LOS OBJETIVOS
Customers	Safety and health of customers Relationship with the customers Quality of service	3 SALUD Y BIENESTAR; 11 CIUDADES Y COMUNIDADES SOSTENIBLES
Economic	Supply chain Long-term business sustainability	8 TRABAJO DECENTE Y CRECIMIENTO ECONÓMICO

Noatum constantly reviews and facilitates dialogue and communication with its stakeholders, through the various internal and external communication channels.

Looking ahead to 2022, we intend to develop a dual materiality analysis to identify and update material issues, assess and prioritise these issues from a Group impact and value perspective, including stakeholder perceptions, and monitor and validate internally and externally the outcome of the analysis.



9.2.
Table of contents required by Law 11/ 2018

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
General information				
Business model	**Brief description of the Group's business model**	3.3. Business model	2-6 Activities, brands, products and services	
		2. Figures that back us	2-7 Employees	
		3.4. Global trends for a global company	2-7 Employees	
	Geographical presence		2-1 Organizational details	Torre Auditori- Planta 13 Passeig de la Zona Franca, 111 08038 Barcelona
		3.1. About Noatum	2-1 Organizational details	
		3.1. About Noatum	2-1 Organizational details	
	Objectives and strategies of the organisation	3.5. Strategic priorities: cross-cutting efficiency and sustainable growth	Internal criteria	
	The main factors and trends that may affect its future evolution	3.4. Global trends for a global company	Internal criteria	
General	**Mention in the report of the national, European or international *reporting* framework used for the selection of non-financial key performance indicators included in each of the sections.**	9. About this report	Selection of GRI Standards	
	If the company complies with the non-financial reporting law by issuing a separate report, it should be expressly stated that such information forms part of the management report	9. About this report.		

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on environmental issues				
Management approach	**A description of the policies applied by the Group with regard to these issues, which will include the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts and for the verification and control, including the measures.**	7.2. Environmental policy and management system	3-3 Management of material items	
	The results of these policies, must necessarily included pertinent key non-financial indicators that enable to monitor and assess the progress and which favour comparison between companies and sectors, in accordance with the national, European and international frameworks of reference used.	7.2. Environmental policy and management system	3-3 Management of material items	
		7.2. Environmental policy and management system	3-3 Management of material items	
		3.1. About Noatum	3-3 Management of material items	
	The main risks related to those issues linked to the Group's activities, including, where relevant and proportionate, its trade relations, products or services that may have negative effects in these fields, and how the Group manages those risks, explaining the procedures used to detect and evaluate them in accordance with the national, European and international frameworks of reference used for each area. Information should be included on the impacts detected, providing a breakdown thereof, in particular on the major risks in the short, medium and long terms	5.5. Risk management	Internal criteria	

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on environmental issues				
Environmental management	**Current and predictable effects of the Company's activities on the environment and, where appropriate, on health and safety.**		307-1 Non-compliance with environmental laws and regulations	In 2021, none of the companies that form part of the Noatum Group were penalised for non-compliance with environmental legislation and regulations.
		8.2. Responsible management of our supply chain	308-2 Negative environmental impacts in the supply chain and actions taken.	
	Environmental assessment or certification procedures	7.2.4. Our environmental certifications Appendix 4.1. List of companies with environmental certifications	3-3 Management of material items	
	Resources dedicated to the prevention of environmental risks	7.3.3. Efficient use of energy	Internal criteria	
	Application of the precautionary principle	7.2.3. Precautionary principle and environmental risk management	3-3 Management of material items	
	Amount of provisions and guarantees for environmental risks	7.2.3. Precautionary principle and environmental risk management	Internal criteria	
Contamination	**Measures to prevent, reduce or remedy emissions that seriously affect the environment; taking into account any form of activity-specific air pollution, including noise and light pollution**	7.5. Fight against climate change	3-3 Management of material items	
		7.6. Minimisation of air pollution	3-3 Management of material items	
		7.6. Minimisation of air pollution	3-3 Management of material items	

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on environmental issues				
Circular economy and prevention of waste	**Measures for prevention, recycling, reuse, other forms of recovery and disposal of waste**	7.4.1. Responsible waste management	306- 2 Waste by type and method of disposal (2020)	
	Actions to combat food waste	7.4.1. Responsible waste management	Non-material	
Sustainable use of resources	**Water consumption and water supply in accordance with the local limitations**	7.3.1 Efficient use of water	303- 1 Interactions with water as a shared resource (2018)	
		7.3.1 Efficient use of water	303-2 Management of impacts related to water discharges (2018)	
		7.3.1 Efficient use of water	303-3 Water extraction (2018)	
	Consumption of raw materials and the measures taken to improve the efficiency of its use	7.3.2. Responsible paper consumption	301-1 Materials used by weight or volume	
	Direct and indirect energy consumption	7.3.3. Efficient use of energy	302-1 Energy consumption within the organisation	
	Measures taken to improve energy efficiency	7.3.3. Efficient use of energy	302-4 Reduction of energy consumption	
	Use of renewable energy	7.3.3. Efficient use of energy	302-1 Energy consumption within the organisation	

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on environmental issues				
Climate change	**Important elements of the greenhouse gas emissions (GHG) generated as a result of Company's activities, including the use of goods and services**	7.5. Fight against climate change	201-2 Financial implications and other risks and opportunities due to climate change	
		7.5. Fight against climate change	305-1 Direct (Scope 1) GHG emissions	
		7.5. Fight against climate change	305-2 Indirect GHG emissions when generating energy (Scope 2)	
		7.5. Fight against climate change	305-3 Indirect GHG emissions (Scope 3)	
	Measures taken to adapt to the consequences of climate change	7.5. Fight against climate change	201-2 Financial implications and other risks and opportunities due to climate change	
	Reduction targets established voluntarily in the medium and long term for reducing greenhouse gas emissions and the measures implemented for this purpose	7.5. Fight against climate change	305-5 Reduction of GHG emissions	
Biodiversity protection	**Measures taken to preserve or restore biodiversity**	7.7. Biodiversity protection	3-3 Management of material items	
	Impacts caused by activities or operations in protected areas	7.7. Biodiversity protection	3-3 Management of material items	

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on social and personnel-related issues				
Management approach	**A description of the policies applied by the Group with regard to these issues, which will include the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts and for the verification and control, including the measures.**	6.1. Our human capital	2-23 Policy commitments	
	The results of these policies, necessarily including pertinent key non-financial indicators that enable to monitor and assess the progress and which favour comparability between companies and sectors, in accordance with the national, European and international frameworks of reference used.	6.2. People Strategic Plan 2020-2022	2-24 Incorporation of policy commitments	
	The main risks related to those issues linked to the Group's activities, including, where relevant and proportionate, its trade relations, products or services that may have negative effects in these fields, and how the Group manages those risks, explaining the procedures used to detect and evaluate them in accordance with the national, European and international frameworks of reference used for each area. Information should be included on the impacts detected, providing a breakdown thereof, in particular on the major risks in the short, medium and long terms	5.5. Risk management	Internal criteria	

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on social and personnel-related issues				
Employment	**Total number and distribution of employees according to representative diversity criteria (gender, age, country, etc.)**	6.1. Our human capital	2-7 Employees	
		Appendix 3.1. Our staff in figures	405-1 Diversity of governance bodies and employees	
	Total number and distribution of employees by employment contract modalities, annual average of permanent contracts, temporary contracts and part-time contracts broken down by gender, age and professional category.	Appendix 3.2. Promoting stable and quality employment	2-7 Employees	
	Number of redundancies by gender, age and professional category	Appendix 3.2. Promoting stable and quality employment	Internal criteria	
	Average salaries and their evolution broken down by gender, age and professional category or equivalent value	6.3. Pay policy and salary gap	Internal criteria	

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on social and personnel-related issues				
Employment	**Wage gap, the remuneration for equal jobs or average of the company**	6.3. Pay policy and salary gap	The formulas used for the calculation of the salary gap are: **Salary Gap** (Average salary of men)/ (average salary of women - average salary of men) **Weighted Salary Gap** Step 1. (Average salary of men) / (average salary of women - salary of men in each category) * (the number of employees in each category / total number of employees of both genders) Step 2. Sum of the weightings of step 1	
	Average remuneration of directors and senior management	6.3. Pay policy and salary gap	Internal criteria	
	Payments to long-term savings provision schemes and any other gender-disaggregated payments	6.3. Pay policy and salary gap	201-3 Defined benefit and other pension plan obligations	
	Implementation of work disengagement policies	6.5. Work-life balance	3-3 Management of material items	
	Employees with disabilities	6.4. Our vision of equality and diversity	405-1 Diversity of governance bodies and employees	

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on social and personnel-related issues				
Organisation of work	**Organisation of working time**	6.5. Work-life balance	3-3 Management of material items	
	Number of hours of absenteeism	Appendix 3.5. Plan	Internal criteria	
	Measures destined to facilitate the enjoyment of family reconciliation and encourage joint responsibility of the same by both parents	6.5. Work-life balance	3-3 Management of material items	
Health and Safety	**Health and Safety at work conditions**	6.7. Safety, health and well-being of our people	403-1 Occupational safety and health management systems (2018)	
		6.7. Safety, health and well-being of our people	403-2 Identification of hazards, risk assessment and investigation of incidents (2018)	
		6.7. Safety, health and well-being of our people	403-3 Health services at work (2018)	
		6.7. Safety, health and well-being of our people	403-5 Educating employees on occupational health and safety (2018)	
		6.7. Safety, health and well-being of our people	403-6 Encouraging health among employees (2018)	
		6.7. Safety, health and well-being of our people	403-7 Prevention and mitigation of impacts on health and safety of workers directly linked (2018)	
	Accidents at work, in particular their frequency and severity, occupational diseases, broken down by gender	Appendix 3.6. Accident rates and occupational diseases	403-9 Injuries due to occupational accident (2018)	

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on social and personnel-related issues				
Social relations	**Organisation of social dialogue, including procedures for informing and consulting staff and negotiating with them**	6.6. We promote social relations	2-29 Approach to stakeholder engagement	
		6.6. We promote social relations	2-30 Collective bargaining agreements	
		6.6. We promote social relations	403-1 Workers' representation in formal worker-company health and safety committees	
	Percentage of employees covered by collective bargaining by country	6.6. We promote social relations	2-30 Collective bargaining agreements	
	The balance of the collective bargaining agreements, particularly in the field of health and safety at work	6.6. We promote social relations	403-4 Workers' participation, consultations and communication on health and safety at work	
		6.6. We promote social relations	403-8 Workers covered by an occupational safety and health management system	
Training	**Policies implemented in the field of training**	6.8. Training and talent development	404-2 Programmes to improve employee skills and transition assistance programmes	
	The total number of training hours broken down by professional categories	Appendix 3.7. Training and talent development	404-1 Average annual number of training hours per employee	

Information required by Law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on social and personnel-related issues				
Universal accessibility of persons with disabilities	**Integration and universal accessibility of persons with disabilities**	Appendix 3.3. Integration of persons with disabilities	405-1 Diversity of governance bodies and employees	
Equality	**Measures taken to promote equal treatment and opportunities for women and men**	6.4. Our vision of equality and diversity	Internal criteria	
	Equality plans (Chapter III of Organic Law 3/2007, of 22 March, for the effective equality of women and men), measures taken to promote employment, protocols against sexual and gender-based harassment.	6.4. Our vision of equality and diversity	405-1 Diversity of governance bodies and employees	
	Integration and universal accessibility of persons with disabilities	6.4. Our vision of equality and diversity	Internal criteria	
	Anti-discrimination and, where appropriate, diversity management policy	6.4. Our vision of equality and diversity	Internal criteria	

Information required by law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on respect for human rights				
Management approach	**A description of the policies applied by the Group with regard to these issues, which will include the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts and for the verification and control, including the measures.**	6.9. Defence of human rights	2-23 Policy commitments 2-24 Incorporation of policy commitments	
	The results of these policies, must necessarily included pertinent key non-financial indicators that enable to monitor and assess the progress and which favour comparison between companies and sectors, in accordance with the national, European and international frameworks of reference used	6.9. Defence of human rights	2-24 Incorporation of policy commitments	
	The main risks related to those issues linked to the Group's activities, including, where relevant and proportionate, its trade relations, products or services that may have negative effects in these fields, and how the Group manages those risks, explaining the procedures used to detect and evaluate them in accordance with the national, European and international frameworks of reference used for each area. Information should be included on the impacts detected, providing a breakdown thereof, in particular on the major risks in the short, medium and long terms	5.5. Risk management	Internal criteria	

Information required by law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information on respect for human rights				
Implementation of due diligence procedures	**Implementation of due diligence procedures in the field of human rights; prevention of risks of violation of human rights and, where appropriate, measures to mitigate, manage and repair possible abuses**	6.9. Defence of human rights	2-25 Processes to remediate negative impacts	
		8.2. Responsible management of our supply chain	414-1 New suppliers who have passed the selection process in accordance with social criteria	
	Complaints involving human rights violations. Promotion and enforcement of the provisions of the core conventions of the International Labour Organisation relating to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in respect of employment and occupation; the elimination of forced or compulsory labour; the effective abolition of child labour	6.9. Defence of human rights	406-1 Incidents of discrimination and corrective actions taken	
		8.2. Responsible management of our supply chain	414-1 New suppliers who have passed the selection process in accordance with social criteria	

Information required by law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information relating to the fight against corruption and bribery				
Management approach	**A description of the policies applied by the Group with regard to these issues, which will include the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts and for the verification and control, including the measures adopted**	5.4. Fighting corruption, bribery and money laundering	2-23 Policy commitments	
	The results of these policies, must necessarily included pertinent key non-financial indicators that enable to monitor and assess the progress and which favour comparison between companies and sectors, in accordance with the national, European and international frameworks of reference used	5.4. Fighting corruption, bribery and money laundering	2-24 Incorporation of policy commitments	
	The main risks related to those issues linked to the Group's activities, including, where relevant and proportionate, its trade relations, products or services that may have negative effects in these fields, and how the Group manages those risks, explaining the procedures used to detect and evaluate them in accordance with the national, European and international frameworks of reference used for each area. Information should be included on the impacts detected, providing a breakdown thereof, in particular on the major risks in the short, medium and long terms	5.5. Risk management	Internal criteria	

Information required by law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information relating to the fight against corruption and bribery				
Information relating to the fight against corruption and bribery	**Measures taken to prevent corruption and bribery**	5.4. Fighting corruption, bribery and money laundering	2-25 Processes to remediate negative impacts	
		5.2. Transparency, ethics and integrity	2-26 Mechanisms for seeking advice and raising concerns	
		5.4. Fighting corruption, bribery and money laundering	205-1 Operations assessed for corruption-related risks	
	Measures to combat money laundering	5.4. Fighting corruption, bribery and money laundering	205-2 Communication and training about anti-corruption policies and procedures	
	Contributions made to foundations and non-profit organisations	8.3. Volunteer collaborations	201-1 Direct economic value generated and distributed	

Information required by law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information relating to the company				
Management approach	**Description of the policies applied by the Group with regard to these issues, which will include the due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts and for the verification and control, including the measures adopted**	8.1. Committed to local development	2-23 Policy Commitments	
	The results of these policies, must necessarily included pertinent key non-financial indicators that enable to monitor and assess the progress and which favour comparison between companies and sectors, in accordance with the national, European and international frameworks of reference used	8.1. Committed to local development	2-24 Incorporation of policy commitments	
	The main risks related to those issues linked to the Group's activities, including, where relevant and proportionate, its trade relations, products or services that may have negative effects in these fields, and how the Group manages those risks, explaining the procedures used to detect and evaluate them in accordance with the national, European and international frameworks of reference used for each area. Information should be included on the impacts detected, providing a breakdown thereof, in particular on the major risks in the short, medium and long terms	5.5. Risk management	Internal criteria	

Information required by law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information relating to the company				
The Company's commitments to sustainable development	**Impact of the Company's activity on employment and local development**	8.3. Volunteer collaborations	413-1 Operations with local community engagement, impact assessments, and development programs	
		8.3. Volunteer collaborations	201-1 Direct economic value generated and distributed	
	Impact of the Company's activity on local populations and the territory	8.3. Volunteer collaborations	413-2 Operations with significant negative impacts - actual or potential - on local communities	
	Relations with the actors of local communities and the dialog modalities used with these	8.3. Volunteer collaborations	Internal criteria	
	Sponsorship and partnership actions	8.4. Participation in associations	2-28 Membership in associations	

Information required by law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information relating to the company				
Subcontracting and suppliers	**The inclusion in the purchasing policy of social issues, gender equality and environmental issues**	8.2. Responsible management of our supply chain	308-1 New suppliers who have passed the selection process in accordance with environmental criteria	
		8.2. Responsible management of our supply chain	414-1 New suppliers who have passed the selection process in accordance with social criteria	
	Consideration in relations with suppliers and subcontractors regarding their social and environmental responsibility	8.2. Responsible management of our supply chain	308-1 New suppliers who have passed the selection process in accordance with environmental criteria	
		8.2. Responsible management of our supply chain	414-1 New suppliers who have passed the selection process in accordance with social criteria	
	Monitoring and audit systems and results of the same	8.2. Responsible management of our supply chain	308-2 Negative environmental impacts in the supply chain and actions taken.	
		8.2. Responsible management of our supply chain	414-2 Negative social impacts in the supply chain and actions taken	

Information required by law on non-financial and diversity information		Chapter	Related GRI Standards and other non-GRI indicators	Comments
Information relating to the company				
Consumers	**Consumer health and safety measures**	4.3.1. Measurement, control and incident management	416-1 Assessment of the health and safety impacts of product or service categories	
	Complaints systems, complaints received and their resolution	4.3.1. Measurement, control and incident management	416-2 Cases of non-compliance concerning health and safety impacts of product and service categories	
Tax information	**Profits obtained on a country-by-country basis, income tax paid**	8.5. Fiscal transparency	201-1 Direct economic value generated and distributed	
		8.5. Fiscal transparency	207-1 Taxes paid by country (2019)	
	Information on public subsidies received	8.5. Fiscal transparency	201-4 Financial assistance received from the government	

9.3. GRI table of contents

	GRI STANDARD CONTENT		Chapter /Direct response	Comments
GRI 1 FUNDAMENTALS (2021)	GRI 1 Fundamentals 2021			
GRI 2 GENERAL CONTENTS (2021)	GRI 2 GENERAL CONTENTS (2021)			
	2-1	Organisational details		
	2-2	Entities included in the Organisation's sustainability reports	Appendix 1. Scope	
	2-3	Reporting period, frequency and point of contact	info@noatum.com	
	2-4	Restatements of information	9. About this report	
	2-5	External assurance	9.4. External verification	
	2-6	Activities, value chain and other business relationships	3.3. Business model	
	2-7	Employees	6.1. Our human capital	
	2-8	Non-employee workers	6.1. Our human capital	
	2-9	Structure and composition of the governing bodies	5.1. Governance structure	
	2-10	Appointment and selection of the highest governing body	5.1. Governance structure	
	2-11	Chairman of the highest governing body	5.1. Governance structure	
	2-12	Role of the highest governing body in overseeing impact management	5.1. Governance structure	
	2-13	Delegation of responsibility for impact management	5.1. Governance structure	
	2-14	Role of the highest governing body in drawing up sustainability reports	9. About this report	

	GRI STANDARD CONTENT		Chapter /Direct response	Comments
	2-15	Conflicts of interest	5.2. Transparency, ethics and integrity	
	2-16	Communication of critical concerns	5.2. Transparency, ethics and integrity	
	2-17	Collective knowledge of the highest governing body	5.1. Governance structure	
	2-18	Performance evaluation of the highest governing body	5.1. Governance structure	
	2-19	Remuneration policies	6.3. Pay policy and salary gap	
	2-20	Process for determining remuneration	6.3. Pay policy and salary gap	
	2-21	Total annual compensation ratio	6.3. Pay policy and salary gap	
	2-22	Sustainable development strategy statement	1. Letter from the Chairman	
	2-23	Policy commitments	3.2. Mission, Vision and Values	
	2-24	Incorporating political commitments	3.2. Mission, Vision and Values	
	2-25	Processes to remedy negative impacts	5.5. Risk management	
	2-26	Mechanisms for seeking advice and raising concerns	5.2. Transparency, ethics and integrity	
	2-27	Compliance with laws and regulations	7.2.3. Precautionary principle and environmental risk management	
	2-28	Membership in associations	8.4. Participation in associations	
	2-29	Approach to stakeholder engagement	9.1. Process of defining relevant issues (materiality)	
	2-30	Collective bargaining agreements	6.6. We promote social relations	
GRI 3 MATERIAL ISSUES (2021)	3-1	Process for determining material issues	9.1. Process of defining relevant issues (materiality)	
	3-2	List of material items	9.1. Process of defining relevant issues (materiality)	

	GRI STANDARD CONTENT		Chapter /Direct response	Comments
GRI 201 ECONOMIC PERFORMANCE (2016)	**3-3**	**Management of material items**		
	201-1	Direct economic value generated and distributed	8.5. Fiscal transparency	
	201-2	Financial implications and other risks and opportunities arising from climate change	7.5. Fight against climate change	
	201-3	Defined benefit and other pension plan obligations	6.3. Pay policy and salary gap	
	201-4	Financial assistance received from the government	8.5. Fiscal transparency	
GRI 202 MARKET PRESENCE (2016)	**3-3**	**Management of material items**		
	202-1	Ratio of standard entry level wage by gender against local minimum	6.3. Pay policy and salary gap	
GRI 203 INDIRECT ECONOMIC IMPACTS (2016)	**3-3**	**Management of material items**		
	203-1	Investments in infrastructure and services supported	8.3. Volunteer collaborations	
	203-2	Significant indirect economic impacts	8.1. Committed to local development	
GRI 205 ANTI-CORRUPTION (2016)	**3-3**	**Management of material items**		
	205-1	Operations assessed for corruption-related risks	5.4. Fighting corruption, bribery and money laundering	
	205-2	Communication and training on anti-corruption policies and procedures	5.4. Fighting corruption, bribery and money laundering	
	205-3	Confirmed cases of corruption and measures taken	5.4. Fighting corruption, bribery and money laundering	
GRI 206 UNFAIR COMPETITION (2016)	**3-3**	**Management of material items**		
	206-1	Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	5.4. Fighting corruption, bribery and money laundering	

	GRI STANDARD CONTENT		Chapter /Direct response	Comments
GRI 207 TAXATION (2019)	**3-3**	**Management of material items**		
	207-1	**Fiscal approach**	8.5. Fiscal transparency	
	207-2	**Fiscal governance, control and risk management**	8.5. Fiscal transparency	
	207-3	**Stakeholder engagement and management of tax concerns**	8.5. Fiscal transparency	
	207-4	Country-by-country reporting		
GRI 301 MATERIALS (2016)	3-3	Management of material items		
	301-1	Materials used by weight or volume	7.3.2. Responsible paper consumption	
GRI 302 ENERGY (2016)	3-3	Management of material items		
	302-1	Energy consumption within the organisation	7.3.3. Efficient use of energy	
	302-4	Reduction of energy consumption	7.3.3. Efficient use of energy	
GRI 303 WATER AND EFFLUENTS (2018)	**3-3**	**Management of material items**		
	303-1	**Interactions with water as a shared resource**	7.3.1 Efficient use of water	
	303-2	**Management of the impacts related to water discharges**	7.3.1 Efficient use of water	
	303-3	Water extraction	7.3.1 Efficient use of water	
	303-4	Water discharges	7.3.1 Efficient use of water	
	303-5	Water consumption	7.3.1 Efficient use of water	
GRI 304 BIODIVERSITY (2016)	**3-3**	**Management of material items**		
	304-1	Owned, leased or managed operations sites located within or adjacent to protected areas or areas of high biodiversity value outside protected areas	7.7. Biodiversity protection	
	304-2	Significant impacts of activities, products and services on the biodiversity	7.7. Biodiversity protection	

	GRI STANDARD CONTENT		Chapter /Direct response	Comments
GRI 305 EMISSIONS (2016)	3-3	Management of material items		
	305-1	Direct GHG emissions (scope 1)	7.5. Fight against climate change	
	305-2	Indirect GHG emissions when generating energy (scope 2)	7.5. Fight against climate change	
	305-3	Indirect (Scope 3) GHG emissions	7.5. Fight against climate change	
	305-5	The reduction of GHG emissions	7.5. Fight against climate change	
	305-7	Nitrogen oxides (NOX), sulphur oxides (SOX) and other significant air emissions	7.6. Minimisation of air pollution	
GRI 306 WASTE (2020)	**3-3**	**Management of material items**		
	306-1	**Waste generation and significant waste-related impacts**	7.4. Our commitment to the circular economy	
	306-2	**Management of significant waste-related impacts**	7.4. Our commitment to the circular economy	
	306-3	Waste generated	7.4. Our commitment to the circular economy	
GRI 308 ENVIRONMENTAL ASSESSMENT OF SUPPLIERS (2016)	**3-3**	**Management of material items**		
	308-1	New suppliers who have passed the selection process in accordance with environmental criteria	8.2. Responsible management of our supply chain	
	308-2	Negative environmental impacts in the supply chain and actions taken	8.2. Responsible management of our supply chain	
GRI 401 EMPLOYMENT (2016)	**3-3**	**Management of material items**		
	401-3	Parental leave	Appendix 3.4. Work-life balance	

	GRI STANDARD CONTENT		Chapter /Direct response	Comments
GRI 403 OCCUPATIONAL HEATH AND SAFETY (2018)	**3-3**	**Management of material items**		
	403-1	**Occupational health and safety management systems**	6.7. Safety, health and well-being of our people	
	403-2	**Identification of hazards, risk assessment and investigation of incidents**	6.7. Safety, health and well-being of our people	
	403-3	**Occupational health services**	6.7. Safety, health and well-being of our people	
	403-4	**Workers' participation, consultation and communication on health and safety at work**	6.7. Safety, health and well-being of our people	
	403-5	**Educating employees on occupational health and safety**	6.7. Safety, health and well-being of our people	
	403-6	**Encouraging health among employees**	6.7. Safety, health and well-being of our people	
	403-8	Coverage of the occupational health and safety management system	6.7. Safety, health and well-being of our people	
	403-9	Injuries due to occupational accident	6.7. Safety, health and well-being of our people	
	403-10	Occupational ailments and illnesses	6.7. Safety, health and well-being of our people	
GRI 404 TRAINING AND EDUCATION (2016)	**3-3**	**Management of material items**		
	404-1	Average number of training hours per year per employee	6.8. Training and talent development	
	404-2	Employee skills enhancement and transition assistance programmes	6.8. Training and talent development	

	GRI STANDARD CONTENT		Chapter /Direct response	Comments
GRI 405 DIVERSITY AND EQUAL OPPORTUNITIES (2016)	**3-3**	**Management of material items**		
	405-1	Diversity in governing bodies and workforce	Appendix 3.1. Our staff in figures	
	405-2	Ratio of basic salary and remuneration of women versus men	6.3. Pay policy and salary gap	
GRI 407 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING (2016)	**3-3**	**Management of material items**		
	407-1	Operations and suppliers whose right to freedom of association and collective bargaining may be at risk	8.2. Responsible management of our supply chain	
GRI 408 CHILD LABOUR (2016)	**3-3**	**Management of material items**		
	408-1	Operations and suppliers with significant risk of being involved in child labour	8.2. Responsible management of our supply chain	
GRI 409 FORCED OR COMPULSORY LABOUR (2016)	**3-3**	**Management of material items**		
	409-1	Operations and suppliers with significant risk of being involved in forced or compulsory labour	8.2. Responsible management of our supply chain	
GRI 412 HUMAN RIGHTS ASSESSMENT (2016)	**3-3**	**Management of material items**		
	412-1	Operations subject to reviews or evaluations regarding impact on human rights	6.9. Defence of human rights	

	GRI STANDARD CONTENT		Chapter /Direct response	Comments
GRI 413 LOCAL COMMUNITIES (2016)	**3-3**	**Management of material items**		
	413-1	Operations with local community participation, evaluations	8.1. Committed to local development	
	413-2	of impact and development programmes	8.1. Committed to local development	
GRI 414 ENVIRONMENTAL ASSESSMENT OF SUPPLIERS (2016)	**3-3**	**Management of material items**		
	414-1	Operations subject to human rights impact assessments or reviews	8.2. Responsible management of our supply chain	
	414-2	New suppliers who have passed the selection process in accordance with social criteria	8.2. Responsible management of our supply chain	
GRI 416 CUSTOMERS' HEALTH AND SAFETY (2016)	**3-3**	**Management of material items**		
	416-1	Health and safety impact assessment of product or service categories	4.3.1. Incident measurement, control and management	
	416-2	Non-compliance cases related to health and safety impacts of product and service categories	4.3.1. Incident measurement, control and management	

9.4.
External verification



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

INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED NON-FINANCIAL STATEMENT

To the sole Shareholder of Noatum Holdings, S.L.U.:

Pursuant to article 49 of the Code of Commerce we have performed a verification, with a limited assurance scope, of the accompanying Consolidated Non-Financial Statement (hereinafter NFS) for the year ended December 31, 2021, of Noatum Holdings, S.L.U. and Subsidiaries (hereinafter, the Group), which is part of the Group's Consolidated Management Report.

The content of the NFS includes additional information to that required by prevailing mercantile regulations in relation to non-financial information that has not been subject to our verification. In this regard, our review has been exclusively limited to the verification of the information shown in section 9.2 "Table of contents required by Law 11/ 2018", included in the accompanying NFS.

Directors' Responsibility

The Board of Directors of Noatum Holdings, S.L.U. is responsible for the approval and content of the NFS included in the Consolidated Management Report of the Group. The NFS has been prepared in accordance with the contents established in prevailing mercantile regulations and following Sustainability Reporting Standards selected criteria of the Global Reporting Initiative (GRI standards), as well as other criteria described in accordance with that indicated for each subject in section 9.2 "Table of contents required by Law 11/ 2018", included in the accompanying NFS.

This responsibility also includes the design, implementation and maintenance of such internal control as they determine is necessary to enable the preparation of a NFS that is free from material misstatement, whether due to fraud or error.

The Board of Directors of Noatum Holdings, S.L.U. is further responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the NFS is obtained.

Our independence and quality control

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

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

The engagement team consisted of experts in the review of Non-Financial Information and, specifically, in information about economic, social and environmental performance.

Domicilio Social: C/ Raimundo Fernández Villaverde, 61, 28003 Madrid - Inscrita en el Registro Mercantil de Madrid, tomo 9.267 general, 8.118 de la sección 3ª del Libro de Sociedades, folio 68, hoja M-87.895-1, inscripción 1ª - NIF B-78.970.506 - A member firm of Ernst & Young Global Limited

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Our responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed. Our work has been performed in accordance with the requirements established in prevailing International Standard on Assurance Engagements 3000 "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (ISAE 3000 Revised) issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the Guidelines on assurance engagements on the Non-Financial Information Statement issued by the Spanish Institute of Chartered Accountants.

In a limited assurance engagement, the procedures carried out vary in nature and timing, and are less in extent than those carried out for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is also substantially lower.

Our work consisted in requesting information from Management and the various Group units participating in the preparation of the NFS, reviewing the process for gathering and validating the information included in the NFS, and applying certain analytical procedures and sampling review tests as described below:

- Holding meetings with Group personnel to gain understanding of the business model, policies and management approaches applied, and of the main risks related to these matters, and obtaining the necessary information for our external review.
- Analyzing the scope, relevance and integrity of the content included in the 2021 NFS based on the materiality analysis made by the Group and described in section 9.1 "Process of defining relevant issues (materiality)" of the NFS, considering the content required by prevailing mercantile regulations.
- Analyzing the processes for gathering and validating the data included in the 2021 NFS.
- Reviewing the information on the risks, policies and management approaches applied in relation to the material aspects included in the 2021 NFS.
- Checking, through tests, based on a selected sample, the information related to the content of the 2021 NFS and its correct compilation from the data sources.
- Obtaining a representation letter from the Directors and Management.

Conclusion

Based on the procedures performed in our verification and the evidence obtained, no matter has come to our attention that would lead us to believe that the 2021 NFS of the Group for the year ended December 31, 2021 has not been prepared, in all material respects, in accordance with the contents established in prevailing mercantile regulations and following the criteria of the selected GRI standards, as well as other criteria described in accordance with that indicated for each subject in section 9.2 "Table of contents required by Law 11/ 2018", included in the NFS.

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Use and distribution

This report has been prepared to comply with prevailing mercantile regulations in Spain and may not be suitable for any other purpose or jurisdiction.

ERNST & YOUNG, S.L.

(Signature on the original in Spanish)

Antonio Capella Elizalde

June 17, 2022

A member firm of Ernst & Young Global Limited

Appendix 1
Scope of the report

The scope of this report is as follows:

ARGENTINA:
Noatum Logistics Argentina Inc. S.R.L.

CHILE:
Noatum Logistics Chile Limited

CHINA:
Noatum Logistics (Shanghai) Limited

COLOMBIA:
Noatum Logistics Colombia Inc. (SAS)

SPAIN:
Autoterminal, S.A.
Combalía Agencia Marítima, S.A.U.
Euroship Services Barcelona, S.L.U.
Frigoríficos de Castellón, S.A.
Grupajes y Trincajes Port, S.L.
Lematrans Castellón, S.A.U.
Marítima del Mediterráneo, S.A.U.
Noatum Holdings
Noatum Chartering, S.L.U.
Noatum Logistics
Noatum Logistics Spain, S.A.U.
Noatum Maritime
Noatum Terminal Santander, S.A.U.
Noatum Terminal Castellon, S.A.
Noatum Terminal Malaga, S.A.U.
Noatum Terminal Polivalente Santander, S.L.U.
Noatum Terminal Sagunto, S.L.
Noatum Terminal Tarragona, S.A.
Noatum Terminals
Rudder Marine Services & Ship Repairs, S.L.
Rudder Workshop Algeciras, S.L.
Samskip
Universal Marítima, S.L.U.

UNITED STATES:
Noatum Logistics USA, LLC

FRANCE:
Marmedsa, S.A.R.L.

HONG KONG:
Noatum Logistics Hong Kong Limited

INDIA:
Noatum Logistics India Pte Limited

INDONESIA:
Noatum Logistics Indonesia Pte Limited

MEXICO:
Actanis Mexico, S.A. de C.V.
Meridian IQ Logistics S de R.L. de C.V.

PERU:
Noatum Logistics Peru Inc. S.R.L.

PORTUGAL:
Marmedsa Agência Marítima (Portugal), Lda.
Noatum Portugal
Noatum Logistics Portugal Unipessoal, Lda

UNITED KINGDOM:
Noatum Logistics UK Limited

TURKEY:
Noatum Lojistik, A.S. (USD)

Appendix 2
Staff-related indicators

2.1.
Our staff in figures



As of 31 December 2021, our workforce comprised 2,385 professionals, almost 6% more than in 2020.

Number of employees, by gender	**2021**	2020
Women	**1,119**	**1,059**
% women	46.92%	46.96%
Men	1,266	1,196
% men	53.08%	53.04%
Total	**2,385**	**2,255**

In 2021, the reporting perimeter of our workforce also covered Argentina with six employees, three men and three women.

Number of employees, by country	2021	2020
SPAIN	**947**	**945**
Women	371	379
Men	576	566
PORTUGAL	**95**	**94**
Women	38	37
Men	57	57
UNITED KINGDOM	**339**	**324**
Women	181	183
Men	158	141
TURKEY	**182**	**163**
Women	83	72
Men	99	91
CHINA	**119**	**113**
Women	91	79
Men	28	34
HONG KONG	**93**	**88**
Women	60	55
Men	33	33
INDONESIA	**51**	**47**
Women	24	21
Men	27	26
SINGAPORE	**12**	**12**
Women	5	4
Men	7	8

Number of employees, by country	2021	2020
TAIWAN	**14**	**11**
Women	12	10
Men	2	1
MEXICO	**15**	**12**
Women	9	8
Men	6	4
UNITED STATES	**196**	**189**
Women	113	93
Men	83	96
PERU	**199**	**149**
Women	62	60
Men	137	89
CHILE	**42**	**42**
Women	23	23
Men	19	19
COLOMBIA	**36**	**23**
Women	28	17
Men	8	6
ARGENTINA	**6**	**-**
Women	3	-
Men	3	-
FRANCE	**39**	**43**
Women	16	18
Men	23	25
Total	**2,385**	**2,255**

Number and percentage of employees by professional category and by age groups

	2021		2020	
	No.	**%**	**No.**	**%**
Staff	**1,803**		**1,665**	
Below 30 years	385	21.4%	365	21.9%
Between 30 and 50 years	1,133	62.8%	1,028	61.8%
Over 50 years	285	15.8%	272	16.3%
Middle Management	**448**		**452**	
Below 30 years	23	5.1%	21	4.6%
Between 30 and 50 years	312	69.7%	318	70.4%
Over 50 years	113	25.2%	113	25.0%
Directors	**119**		**124**	
Below 30 years	-	0.0%	-	0.0%
Between 30 and 50 years	68	57.1%	80	64.5%
Over 50 years	51	42.9%	44	35.5%
Top Management	**15**		**14**	
Below 30 years	-	0.0%	-	0.0%
Between 30 and 50 years	8	53.3%	7	50.0%
Over 50 years	7	46.7%	7	50.0%

Number and percentage of employees by professional category and gender

	2021		2020	
	No.	**%**	**No.**	**%**
Staff	**1803**		**1665**	
Women	913	50.6%	859	51.6%
Men	890	49.4%	806	48.4%
Middle Management	**448**		**452**	
Women	182	40.6%	177	39.2%
Men	266	59.4%	275	60.8%
Directors	**119**		**124**	
Women	24	20.2%	23	18.5%
Men	95	79.8%	101	81.5%
Top management	**15**		**14**	
Women	0	0.0%	0	0.0%
Men	15	100.0%	14	100.0%

2.2. Promoting stable and quality employment

Total number and distribution of types of employment contracts (at 31 December)	**2021**	2020
Contracts		
Permanent	2178	2094
Temporary	207	161
Total	**2,385**	**2,255**
Full		
Full-time	2360	2176
Part-time	25	79
Total	**2,385**	**2,255**

Average annual number of permanent contracts	**2021**	2020
By gender		
Women	1,076.1	1,063.6
Men	1,134.2	1,157.9
By age group		
Below 30 years	331.2	360.7
Between 30 and 50 years	1,419.5	1,394.8
Over 50 years	459.6	466.0
By professional category		
Staff	1,714.4	1,632.2
Middle management	367.2	449.7
Directors	113.9	125.0
Top Management	14.8	14.6

Average annual number of temporary contracts	**2021**	2020
By gender		
Women	56.0	50.6
Men	118.7	83.5
By age group		
Below 30 years	50.9	39.2
Between 30 and 50 years	105.7	83.6
Over 50 years	18.1	11.3
By professional category		
Staff	167.0	124.7
Middle management	7.7	9.4
Directors	0.0	0.0
Top Management	0.0	0.0

Average annual number of part-time contracts	2021	2020
By gender		
Women	15.1	75.2
Men	8.4	18.1
By age group		
Below 30 years	1.0	7.2
Between 30 and 50 years	12.6	58.2
Over 50 years	9.9	27.9
By professional category		
Staff	19.3	80.4
Middle management	4.0	11.9
Directors	0.2	1.0
Top Management	0.0	0.0

Number of redundancies	2021	2020
By gender		
Women	91	118
Men	90	125
By age group		
Below 30 years	21	46
Between 30 and 50 years	106	126
Over 50 years	54	71
By professional category		
Staff	162	210
Middle management	9	29
Directors	10	4
Top Management	0	0

2.3. Integrating people with disabilities

Average annual number of part-time contracts	2021	2020
Staff	**12**	**7**
Women	4	2
Men	8	5
Middle management	**2**	**1**
Women	1	1
Men	1	0
Directors	**0**	**0**
Women	0	0
Men	0	0
Top Management	**0**	**0**
Women	0	0
Men	0	0

2.4. Work-life balance

Parental leave	2021
Staff who have been entitled to parental leave	1,910
Women	976
Men	934
Staff who have taken parental leave	**78**
Women	35
Men	43
Of the above, people who have returned to their jobs after parental leave	**73**
Women	34
Men	39
Of the above, persons who after returning to work after parental leave continue to work in the organisation after 12 months	**72**
Women	33
Men	39
Return to work rate	**94%**
Women	97%
Men	91%
Retention rate	**99%**
Women	97%
Men	100%

2.5. Plan

Absenteeism hours by country	2021	2020
Argentinean	63.00	0.00
Chile	2,835.00	2,718.00
China	4,784.00	1,600.00
Colombia	176.00	270.50
France	2,791.00	383.00
Hong Kong	1,320.00	1,056.00
Indonesia	8.00	200.00
Mexico	296.00	0.00
Peru	5,970.00	6,608.00
Portugal	6,464.00	1,239.00
Singapore	28.00	104.00
Spain	88,048.00	60,920.00
Taiwan	388.08	342.65
Turkey	1,360.00	680.00
United Kingdom	16,246.35	17,068.81
United States	3,821.35	2,042.52
Total	**134,599**	**95,232**

2.6. Accident rates and occupational diseases

This report only includes data from those countries in which there have been accidents and/or occupational diseases (Spain, United Kingdom and Peru).

Accidents (Spain)	2021	2020
Actual hours worked	**1,342,783**	**1,536,635**
Women	520,492.91	609,618.93
Men	822,290.25	927,016.3
Accidents without sick leave	**0**	**0**
Women	N/	N/
Men	N/	N/
Accidents with sick leave	**12**	**13**
Women	3	3
Men	9	10
Accidents with *in itinere* sick leave	**3**	**0**
Women	3	0
Men	0	0
Lost days	**391**	**603**
Women	72	66
Men	319	537

Accidents (Spain)	2021	2020
Frequency index	**8.94**	**8.46**
Women	5.76	4.9
Men	10.95	10.79
Severity index	**0.29**	**0.39**
Women	0.14	0.11
Men	0.39	0.58
Professional illnesses	**0**	**0**
Women	0	0.00
Men	0	0.00
Deaths resulting from an occupational accident injury	**0**	**0.00**
Rate of deaths resulting from an occupational accident injury	**0**	**0.00**
Injuries due to accidents at work with major consequences (excluding deaths)	**1**	**0.00**
Injury rate due to occupational accidents with major consequences (excluding fatalities)	**0.75**	**0.00**
Recordable occupational accident injuries	**12**	**13.00**
Main reasons for accidents	**Related to port work operations** (TERMINALS)	**Related to port work operations** (TERMINALS)

In itinere accidents with sick leave are considered as there has been a medical report and road safety is an aspect to be considered as cross-cutting and which affects workers in relation to port facilities and journeys on mission.

Occupational diseases (Spain)	2021	2020
Frequency index	**0.0**	**0.0**
Women	0.0	0.0
Men	0.0	0.0
Severity index	**0.0**	**0.0**
Women	0.0	0.0
Men	0.0	0.0



Accidents (United Kingdom)	2021	2020
Actual hours worked	**532,902**	**775,192**
Women	286,339.42	436,962.125
Men	246,562.7	338,229.5
Accidents without sick leave	**0**	**0**
Women	N/	N/
Men	N/	N/
Accidents with sick leave	**3**	**10**
Women	2	5
Men	1	5
Accidents with *in itinere* sick leave	**0**	**0**
Women	0	0
Men	0	0
Lost days	**17**	**26**
Women	11	11
Men	6	15
Frequency index	**5.63**	**12.90**
Women	6.98	11.44
Men	4.06	14.78
Severity index	**0.03**	**0.03**
Women	0.04	0.02
Men	0.02	0.04
Professional illnesses	**0**	**1**
Women	0	1.00
Men	0	0.00

Accidents (United Kingdom)	2021	2020
Deaths resulting from an occupational accident injury	**0.00**	**1.00**
Rate of deaths resulting from an occupational accident injury	**0.00**	**2.30**
Injuries due to occupational accidents with major consequences (excluding deaths)	**0.00**	**0.00**
Injury rate due to occupational accidents with major consequences (excluding deaths)	**0.00**	**0.00**
Recordable occupational accident injuries	**0.00**	**0.00**
Main reasons for accidents	**Logistics operations**	**Logistics operations**

Occupational diseases (United Kingdom)	2021	2020
Frequency index		
Women	0.00	2.30
Men	0.00	0.00
Severity index		
Women	0.00	0.060
Men	0.00	0.00

Accidents (Peru)	2021	2020
Actual hours worked	**354,740**	**371,360**
Women	136,083.29	220,582.73
Men	218,656.44	150,777.27
Accidents without sick leave	**0**	**0**
Women	N/	N/
Men	N/	N/
Accidents with sick leave	**1**	**0**
Women	0	0
Men	1	0
Accidents with *in itinere* sick leave	**0**	**0**
Women	0	0
Men	0	0
Lost days	**57**	**0**
Women	0	0
Men	57	0
Frequency index	**2.82**	**0**
Women	0.00	0.00
Men	4.57	0.00
Severity index	**0.16**	**0**
Women	0.00	0.00
Men	0.26	0.00
Professional illnesses	**0**	**0**
Women	0	0.00
Men	0	0.00

Accidents (Peru)	2021	2020
Deaths resulting from an occupational accident injury	**0**	**0.00**
Rate of deaths resulting from an occupational accident injury	**0**	**0.00**
Injuries due to occupational accidents with major consequences (excluding deaths)	**0**	**0.00**
Injury rate due to occupational accidents with major consequences (excluding deaths)	**0**	**0.00**
Recordable occupational accident injuries	**Leg due to same level fall**	**0.00**
Main reasons for accidents		**0**

Occupational diseases (Peru)	2021	2020
Frequency index		
Women	0.0	0.0
Men	0.0	0.0
Severity index		
Women	0.0	0.0
Men	0.0	0.0

2.7. Training and talent development

Total training hours by professional category	**2021**	2020
Staff	**9,852.62**	**9,742.75**
Middle management	3,280.68	3,007.75
Directors	1,207.90	1,234.50
Top Management	12.34	12
Total	**14,354**	**13,997**
Average hours of training per employee	**15.16**	**14.81**



Appendix 3
Environmental indicators

Appendix 3.1. List of companies with environmental certifications

Company name	ISO 14001	GPPA	EMAS	ISO 50001
Autoterminal, S.A.	YES	YES	YES	-
Frigoríficos de Castellón, S.A.	YES	-	-	-
Lematrans Castellón, S.A.U.	YES	-	-	-
Marítima del Mediterráneo, S.A.U.	YES	-	-	-
Noatum Logistics Chile Limited	YES	-	-	-
Noatum Logistics Colombia Inc. (SAS)	YES	-	-	-
Noatum Logistics Peru Inc. S.R.L.	YES	-	-	-
Noatum Logistics Spain, S.A.U.	YES	-	-	-
Noatum Terminal Santander, S.A.U.	YES	YES	-	-
Noatum Terminal Castellón, S.A.	YES	YES	-	-
Noatum Terminal Malaga, S.A.U.	YES	YES	-	-
Noatum Terminal Polivalente Santander, S.L.U.	YES	YES	-	-
Noatum Terminal Sagunto, S.L.	YES	YES	-	YES
Noatum Terminal Tarragona, S.A.	YES	YES	-	-
Rudder Marine Services & Ship Repairs, S.L.	YES	-	-	-
Marmedsa, S.A.R.L.	YES	-	-	-

Appendix 3.2. Efficient use of water

The following table presents the water consumption for the different countries reported in the scope of this report.

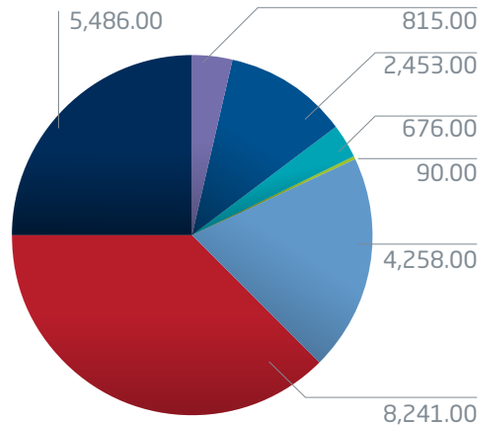
Water consumption (m^3)	2021	2020
Spain	20,153.31	23,796.06
Portugal	197.07	442.05
Argentina*	681.29	-*
Chile	417.02	672.57
China	3,835.00	418.00
France	370.57	137.34
Peru	6,387.29	976.17
Turkey	892.41	786.70
UK	12,086.22	4,843.62
USA	3,199.08	2,863.64

* In 2021, Argentina is included in the scope of the report.

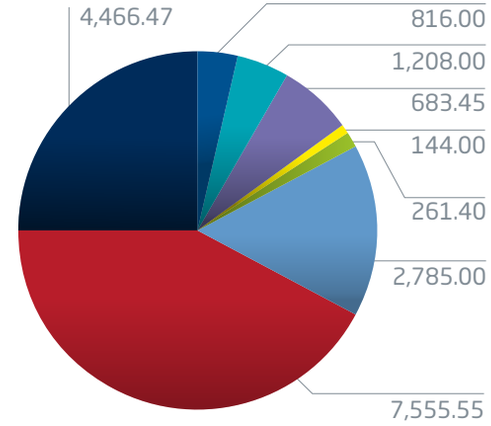
The evolution of water consumption in port terminals for the years 2021-2020 is presented below.

Water consumption (m^3)

2020



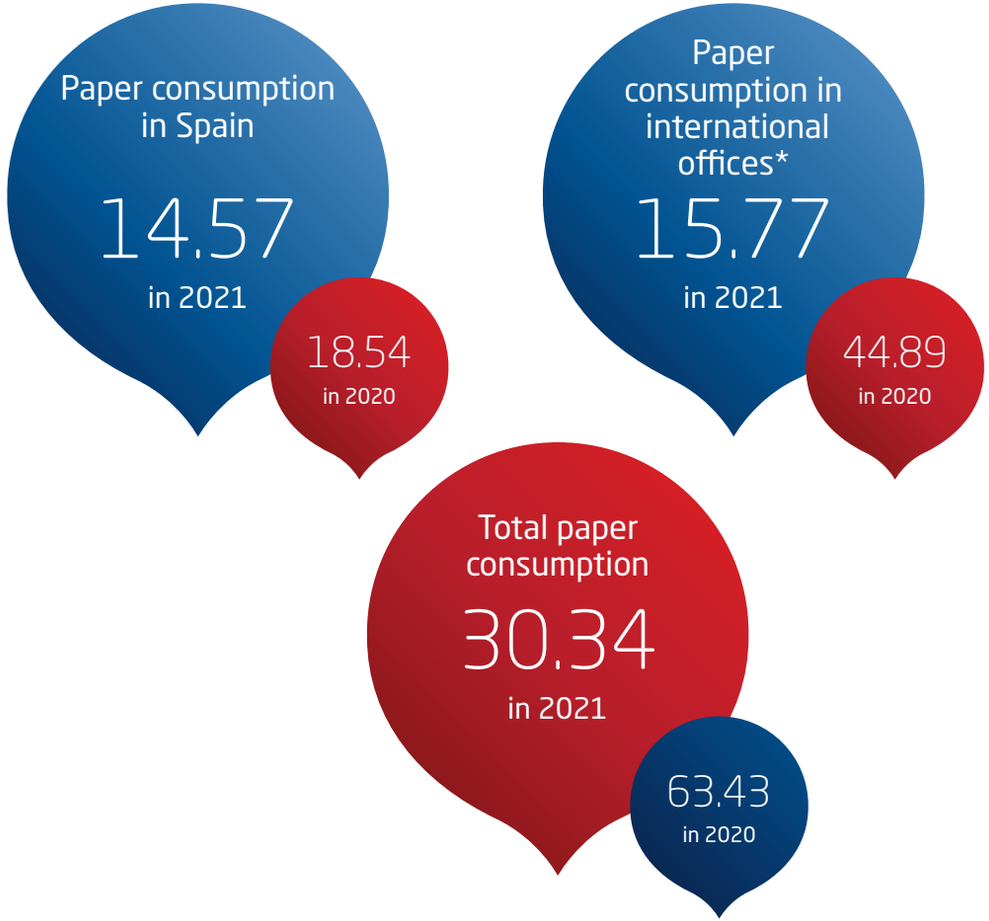
2021



- NOATUM TERMINAL TARRAGONA
- NOATUM TERMINAL MÁLAGA
- NOATUM TEMRINAL CASTELLÓN
- GRUPAJES Y TRINCAJES
- FRICASA
- NOATUM TERMINAL SAGUNTO
- NOATUM TERMINAL SANTANDER
- AUTOTERMINAL

Appendix 3.3.
Responsible paper consumption

Paper consumption (tonnes)



* The UK consumption figure is not comparable, as it uses a different calculation methodology.



Appendix 3.4. Fossil fuel consumption

Fuel consumption by country

		2021	2020
Spain	Diesel A consumption (litres)	209,167.84	188,588.91
	Diesel B consumption (litres)	1,897,518.11	1,422,165.00
	Petrol consumption (litres)	25,219.88	29,808.57
Portugal	Diesel A consumption (litres)	23,999.40	23,960.08
	Petrol consumption (litres)	399.80	1,575.00
Argentina*	Petrol consumption (litres)	422.22	-
France	Diesel A consumption (litres)	13,139.26	13,804.20
Indonesia	Diesel A consumption (litres)	2,727.38	-**
	Petrol consumption (litres)	7,094.282	-**
Mexico	Petrol consumption (litres)	3,078.89	-**
Peru	Diesel A consumption (litres)	66,898.44	36,127.88
	Petrol consumption (litres)	11,921.59	11,555.41
Turkey	Diesel A consumption (litres)	31,144.86	40,969.67
	Petrol consumption (litres)	41,211.12	3,071.08
UK	Natural gas consumption (kwh)	73,160.87	-
	Propane gas consumption (kwh)	1,782	-
	Diesel A consumption (litres)	26,359.44	22,857.68
	Petrol consumption (litres)	13,185.23	18,383.27
USA	Diesel A consumption (litres)	3,748.11	753.19
	Petrol consumption (litres)	80.95	342.4

* Argentina is included in the scope of the report in 2021.
** Data was not available for Indonesia and Mexico last year.

Consumption per terminal*

		2021	2020
NOATUM TERMINAL TARRAGONA	Diesel A consumption (litres)	0	6,594.44
	Diesel B consumption (litres)	124,596	102,728
	Petrol consumption (litres)	0	8,340.84
NOATUM TERMINAL MÁLAGA	Diesel A consumption (litres)	15,110.87	12,376
	Diesel B consumption (litres)	537,268	314,981
	Petrol consumption (litres)	1,706.81	6,317.86
NOATUM TERMINAL CASTELLÓN	Diesel A consumption (litres)	6,182.56	6,066
	Diesel B consumption (litres)	464,934	416,003
	Petrol consumption (litres)	3,819.21	3,836
GRUPAJES Y TRINCAJES	Diesel A consumption (litres)	4,074.76	-
	Diesel B consumption (litres)	1,215.11	-
	Petrol consumption (litres)	11.61	-
FRICASA	Diesel A consumption (litres)	363.07	-
	Petrol consumption (litres)	259.72	-
NOATUM TERMINAL SAGUNTO	Diesel A consumption (litres)	22,607.33	20,050.09
	Diesel B consumption (litres)	581,611	426,007
NOATUM TERMINAL POLIVALENTE SANTANDER	Petrol consumption (litres)	2,220.73	419.02
	Diesel A consumption (litres)	27,092	33,055
	Diesel B consumption (litres)	187,894	162,446
AUTOTERMINAL	Diesel A consumption (litres)	38,481.4	40,360.18
	Petrol consumption (litres)	5,451.68	6,456.86

* fuel consumption of Noatum Terminals SSCC staff is not included.

Appendix 3.5. Electricity consumption

Electricity consumption by country (kWh)	2021	2020
Spain	8,920,344.73	7,984,509.69
Portugal	30,678.52	64,410.11
Argentina*	10,530.43	-
Chile	35,076.66	23,074.65
China	171,532.76	226,179.56
Colombia	5,561.25	5,580.81
France**	36,861.97	-
Hong Kong	73,567.50	76,703.91
Indonesia	29,501.70	46,161.20
Peru	37,529.03	143,793.87
Turkey	77,720.62	71,309.63
UK	1,328,948.99	1,441,672.08
USA	719,591.87	819,318.16
Total	**11,477,446.03**	**10,902,713.67**

Electricity consumption of port terminals (kWh)	2021	2020
NOATUM TERMINAL TARRAGONA	215,934.00	223,111.01
NOATUM TERMINAL MÁLAGA	2,323,271.00	1,872,859.00
NOATUM TERMINAL CASTELLÓN	667,950.87	634,425.93
FRICASA	1,640,075.00	1,588,469.00
NOATUM TERMINAL SAGUNTO	771,937.00	640,854.97
NOATUM TERMINAL POLIVALENTE SANTANDER	6,833.16	6371.28
NOATUM TERMINAL SANTANDER	702,829.00	621,516.51
AUTOTERMINAL	1,304,654.00	1,367,617.81
Total	**7,633,484.03**	**6,954,867.36**

* Argentina is included in the scope of the report in 2021.

** electricity consumption data for France were not available in 2020

Appendix 3.6. Responsible waste management in port facilities

Waste name	CATEGORY	LER CODE	QUANTITY (kg)
Contaminated absorbents	Hazardous	15 02 02*	8,154.40
Used oil	Hazardous	13 02 05*	19,213.40
Antifreeze	Hazardous	16 01 14*	440.00
Batteries and accumulators	Hazardous	16 06 01*	2,160.75
Carbonate	Non-hazardous	16 03 04	93,748.00
Cardboard	Non-hazardous	15 01 01	75.00
Ink and toner cartridges	Non-hazardous	08 03 17*	146.11
Scrap	Non-hazardous	16 01 17	64,669.00
Hazardous components	Hazardous	16 01 21*	103.00
Aerosol containers	Hazardous	16 05 04*	407.64
Contaminated packaging	Hazardous	15 01 10*	1,893.81
Discarded equipment	Hazardous	16 02 11*	116.00
Electrical and electronic equipment	Hazardous	16 02 13*	779.00
Filters	Non-hazardous	15 02 03	655.00
Oil filters	Hazardous	16 01 07*	2,218.78
Concrete	Non-hazardous	17 01 01	1,460.00
Sludge	Non-hazardous	19 08 14	73,140.00
Wood	Non-hazardous	17 02 01	46,820.00

Waste name	CATEGORY	LER CODE	QUANTITY (kg)
Materials unsuitable for consumption	Non-hazardous	02 02 03	176,766.00
Oil and water mixture	Hazardous	13 05 07*	5,140.00
Bituminous mixtures	Non-hazardous	17 03 02	15,880.00
Other waste	Non-hazardous	10 12 01	28,340.00
Paper / Cardboard	Non-hazardous	20 01 01	22,704.00
Alkaline batteries	Hazardous	16 06 03*	17.00
Paints, lacquers and varnishes	Hazardous	08 01 11*	55.77
Plastic	Non-hazardous	20 01 39	14,381.00
Construction and demolition waste	Non-hazardous	17 01 07	212,859.00
Waste sands and clays	Non-hazardous	01 04 09	1,741,300.00
Degreasing waste	Hazardous	11 01 13*	288.76
Municipal waste	Non-hazardous	20 03 01	45,649.00
Organic waste	Non-hazardous	16 03 06	14,800.00
Bulky waste	Non-hazardous	20 03 07	21,440.00
Earth	Non-hazardous	20 02 02	1,980.00
Fluorescent tubes	Hazardous	20 01 21*	226.00

Appendix 3.7. Greenhouse gas emissions (carbon footprint)

The following tables present the greenhouse gas emissions at our port terminals.

		2021	2020
NOATUM TERMINAL TARRAGONA	SCOPE 1	334.66	312.64
	SCOPE 2	0.00	9.18
NOATUM TERMINAL MÁLAGA	SCOPE 1	1,484.04	897.27
	SCOPE 2	0.24	98.70
NOATUM TERMINAL CASTELLÓN	SCOPE 1	1,272.57	1149.86
	SCOPE 2	0.00	34.10
GRUPAJES Y TRINCAJES	SCOPE 1	13.30	0.00
FRICASA	SCOPE 1	1.47	0.00
	SCOPE 2	0.00	51.74
NOATUM TERMINAL SAGUNTO	SCOPE 1	1,622.73	1,204.00
	SCOPE 2	3.04	34.23
NOATUM TERMINAL SANTANDER	SCOPE 1	571.22	521.45
	SCOPE 2	0.00	27.61
AUTOTERMINAL	SCOPE 1	106.74	113.64
	SCOPE 2	0.00	69.52
Total		**5,410.01**	**4,524.86**

The following table presents the greenhouse gas emissions - Scope 2 of the entire Group

			CO_2 equivalent emissions Scenario 1 (market-based in Spain)		**CO_2 equivalent emissions Scenario 2** (location-based only)	
Country	**kWh consumption**	**calculation method**	**t CO_2eq.**	**calculation method***	**t CO_2eq.**
Spain	8,920,344.73	market-based	69.96	location-based	1,338.05
Portugal	30,678.52	location-based	6.18	location-based	6.18
Argentina	10,530.43	location-based	3.18	location-based	3.18
Chile	35,076.66	location-based	13.70	location-based	13.70
China	171,532.76	location-based	92.12	location-based	92.12
Colombia	5,561.24	location-based	2.93	location-based	2.93
France	36,861.97	location-based	1.89	location-based	1.89
Hong Kong	73,567.50	location-based	50.21	location-based	50.21
Indonesia	29,501.70	location-based	21.17	location-based	21.17
Peru	37,529.03	location-based	21.77	location-based	21.77
Turkey	77,720.62	location-based	29.15	location-based	29.15
UK	1,328,948.99	location-based	282.18	location-based	282.18
USA	719,591.87	location-based	258.82	location-based	258.82
		Total	**853.27**	**Total**	**3,013.39**

* For the calculation of the emission factor used in Spain with the location-based method, the 2020 mix factor of 0.15 kg CO_2/kWh has been used.
Source: CNMC (National Commission for Markets and Competition).

Appendix 4
Society indicators

Appendix 4.1. Scope of the accreditation process of suppliers in Spain in 2021

Over the course of 2021, new companies have been added to the general accreditation process and the following companies are currently in scope:

- AUTOTERMINAL, S.A.
- GRUPAJES Y TRINCAJES PORT, S.L.
- MARITIMA DEL MEDITERRÁNEO, S.A.U.
- NOATUM CHARTERING, S.L.
- NOATUM HOLDINGS, S.L.U.
- NOATUM LOGISTICS SPAIN, S.A.U.
- NOATUM LOGISTICS, S.L.U.
- NOATUM MARITIME, S.L.
- NOATUM TERMINAL CASTELLÓN, S.A.
- NOATUM TERMINAL MÁLAGA, S.A.U.
- NOATUM TERMINAL POLIVALENTE SANTANDER
- NOATUM TERMINAL, S.L.U.
- NOATUM TERMINAL SAGUNTO, S.L.U.
- NOATUM TERMINAL SANTANDER, S.A.U.
- NOATUM TERMINAL TARRAGONA, S.A.
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