

ESTIBADORA ALGEPOSA, S.A.
Pasaia Port



ENVIRONMENTAL STATEMENT

January-December: Year 2024



ANA PILAR APARICIO BERMEJO

Traductora-Intérprete Jurada de Inglés

Nº 5300



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1 Presentation of the Organisation

1.1 Introduction

ALGEPOSA began its operations in 1981 as a logistics operator with the creation of its own stevedoring company at the Pasaia Port.

The development and growth of its activities in the maritime sector as well as the inclusion of a railway logistics service division has turned ALGEPOSA into one of the leading Spanish companies in maritime, port and railway logistics with an annual turnover of more than 200 million euros.

The group is present at the most representative ports on the Iberian Peninsula and has railway terminals at the most important strategic points: border zones (Irún – Hendaya, Port Bou, Perpignan), Madrid, Sagunto, Barcelona, etc.

The integration of maritime and railway activities under one management and the closeness between the railway terminals and consumption and production centres make ALGEPOSA a first-class integrated logistics operator. An operator that collaborates with the main European railway networks and maintains a position of leadership in steel product transport.

The ALGEPOSA mission is:

"To be a reference group in the country, offering quality logistics solutions that help enhance our customers' competitiveness and satisfy them with professionalism through our integrated services".

And Vision is:

"We aspire to become a reference integrated logistics group and leader in maritime and railway logistics solutions in Spain".

The values that define us are:

- Honest and professional work.
- Ongoing development and improvement based on commitment and loyalty to the company and our customers' success, paying special attention to their specific requirements.
- The integration of individual goals in the group's overall goals.
- Respect for society and the environment wherever we are.

1.2 Description of the company

Business name: *ESTIBADORA ALGEPOSA, S.A.*

Headquarters: Ed. Consignatarios, Planta Baja, 20110 Pasaia, Gipuzkoa, Spain

Phone number: +34 943 350 000

Web address: www.algeposagrupo.com

E-mail: estibadora@algeposa.com

Spanish Economic Activity Code (CNAE): 52.24 Goods handling

Environmental Management Officer/Management Representative: Imanol Mintegui

E-mail: calidad@algeposa.com

The scope of this Statement is:

Port operation management. Road transport management. Railway transport management. Goods storage and distribution at the Pasaia Port facilities.

1.3 Location and Facilities

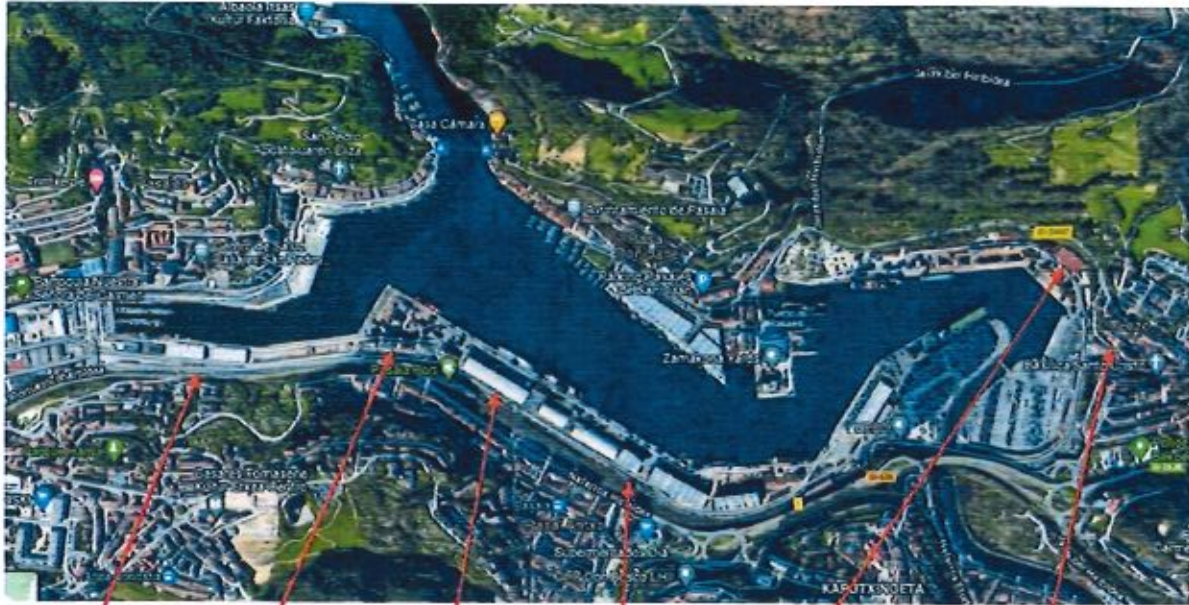
As indicated in the scope of this Statement, the facilities affected are those located at the Pasaia Port.

At this Pasaia Port site, the company has an office, a maintenance shop and the following warehouses:

Facility	Surface area (m ²)	Use
Warehouse 1	2,524	Bulk
Warehouse 2	2,524	Bulk
Warehouse 4	10,500	Steel
Warehouse 6bis	2,603	Steel
Warehouse 8, 9, 10	2,703	General Loading

In addition to other complementary facilities such as: changing rooms, a scale, 20 and 40 m³ diesel fuel tanks and a loading adjustment gangway.

The map shows the most important facilities included in this Statement:

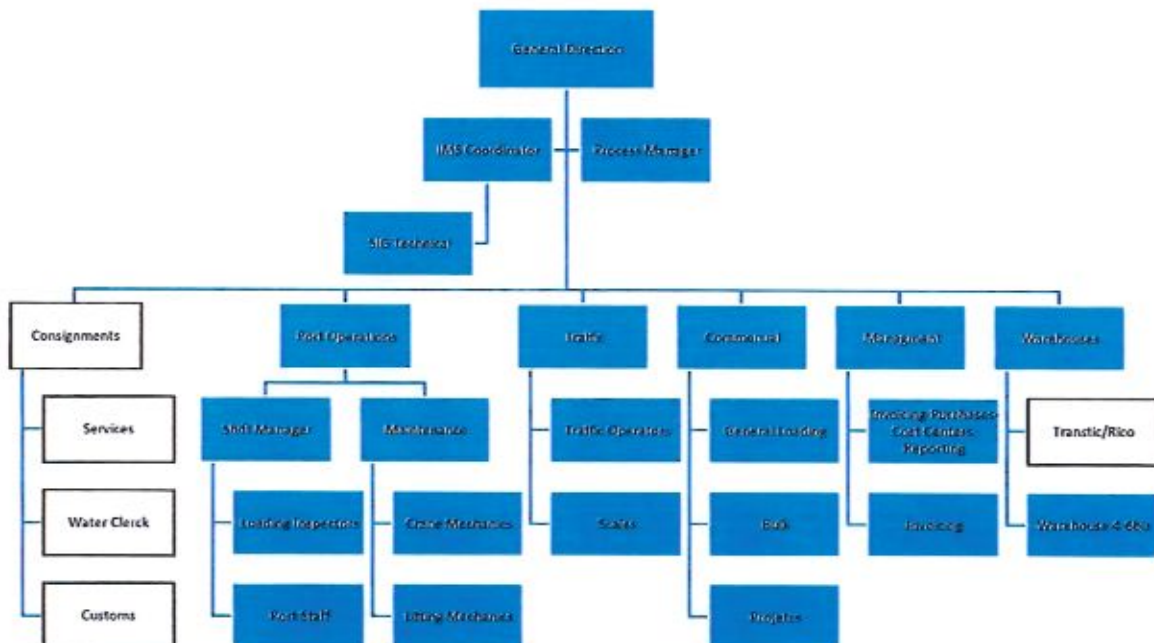


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Warehouses 1 and 2 Offices Warehouse 4 Warehouse 6bis Warehouses 8, 9, 10 Maintenance workshop

1.4 Organisation Chart

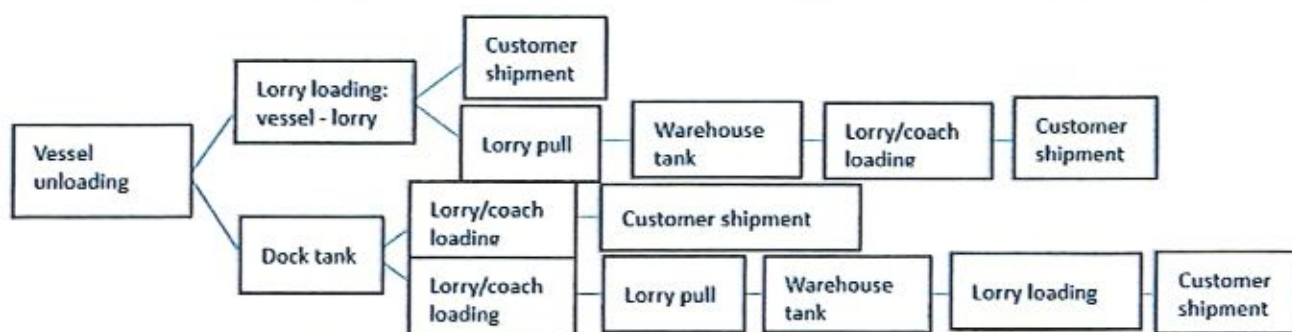
The ESTIBADORA ALGEPOSA, S.A. organisation is reflected in the following organisation chart:



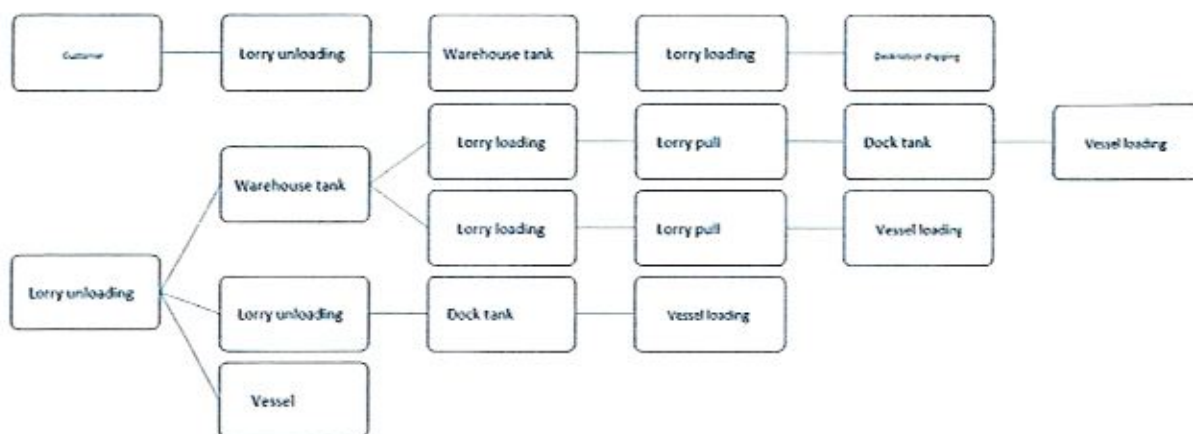
Blue indicates the part of the organisation affected by this Statement.

1.5 Activity Flow Chart

PRODUCT UNLOADING FLOW CHART



PRODUCT LOADING FLOW CHART



1.6 Machinery

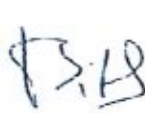
The company has the following main machinery in addition to light vehicles to perform its operations:

Identification	Machine	No. Units
GOTTWALD	Crane	2
MULTIDOCKER	Crane	1
Volvo 90	Front loader	1
Volvo L90	Front loader	1
Volvo L150H	Front loader	1
Volvo L120	Front loader	1
Volvo L70	Front loader	1
Volvo L35	Hydro-sweeper	1
Bobcat S300	Front loader	1
Hyster H400 XLX 3 T	Forklift	1
Kalmar 12 T	Forklift	1
Kalmar 16 T	Forklift	2
Kalmar 33 T	Forklift	2
Kalmar 42 T	Forklift	1
Svetruck 28T	Forklift	1
Sennebogen 835E	Backhoe	1
Lift Platform	Lift Platform	1
Liebherr A924	Excavator	1

1.7 Certifications

The company has different international certificates which prove its commitment to protecting the environment (ISO 14001) and has signed the Port Authority Convention for the Pasaia Port on best environmental practices. It is Occupational Health & Safety certified (ISO 45001), Quality Management System certified (ISO 9001), Food Safety certified to manage feed (GMP+) and *Eko Lurra* certified with the Basque Country Ecological Farming Production operators register.

Certificado OEA

1. Titular del certificado OEA ESTIMADORA ALGEPOSA SA Nómina de IVA: ES1300008	2. Autoridad emisora: ES AECF 1300008QAM (Puntos de certificación)  M. Pilar Jurado Bermejo
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El valor mencionado en el certificado es:

Operador Económico Autorizado

- ☐ - Simplificación aduanera
☐ - Protección y seguridad
☒ - Simplificación aduanera, protección y seguridad

3. Fecha de entrada en vigor del certificado: **21-07-2012**

eko hurra **Subvenciones y ayudas**
 Subvenciones y ayudas
 Normalización
 Consejo de Agricultura y Alimentación Ecológica de España

CERTIFICADO DE CONFORMIDAD Número de documento: **2148/30122022**

El Consejo de Agricultura y Alimentación Ecológica de España es la Autoridad de Control de la producción ecológica en España y se encuentra autorizada en la Unión Europea con código: ES-E-00-026 VAS, en aplicación del reglamento de control definido en el Reglamento (UE) N.º 853/2018 del Consejo, de 30 de mayo de 2018, sobre producción y etiquetado de los productos ecológicos, pendientes modificaciones y ampliaciones.

El proceso de certificación del Consejo certifica que:

- ✓ La persona o empresa etiquetada (operador) se encuentra inscrita en el registro de operadores de Producción Agraria Ecológica de España con el número 2148 en la subvención: comunicación, inscripción.
- ✓ Tras evaluar el sistema de producción del operador, implementar el proceso productivo y en su caso tener muestras, se ha concedido la licencia de uso de la marca para utilizar los mensajes protegidos de producción ecológica, según lo establecido en el procedimiento de certificación del Consejo.
- ✓ El operador se encuentra al corriente del pago de los honorarios establecidos.

Nombre y dirección del operador:

Estimadora Algeposa SA
A20140399
Zona Portuaria EBF Consiguatona Puerto Raja
20100 PASADIA GIPUZKOA

Actividad principal: **comercialización**

Acciones y/o productos certificados por el Consejo	Desde
Primer destinatario	01/01/2019
Segundo	
Distribución sin marca	01/01/2019
Segundo	

Producción simultánea no ecológica (Reg. (UE) 2018/848 art. 9)

Primer destinatario

Otro tipo de calificación ecológica

Otro tipo de calificación ecológica

Fecha de validez desde: **30/12/2012** hasta la fecha: **31/12/2024**

Última fecha de control: **24/11/2022**

Entidad de Auditoría Externa o 30 de diciembre de 2022

K. Legarza
Consejo de Agricultura y Alimentación Ecológica de España

  **Subvenciones y ayudas**
 Subvenciones y ayudas
 Normalización
 Consejo de Agricultura y Alimentación Ecológica de España

Agencia Tributaria
 40.340 Aranzeta - Euzkadi (48900) - Tel: 94 427 16 94
 FAX: 94 427 16 94

El presente certificado de conformidad ha sido expedido, sobre la base del artículo 19 del Reg. (UE) N.º 2018/848 y está sujeto a posibles modificaciones. El certificado en vigor debe ser consultado en la página web del Consejo: www.consejo-eco.es

NE Normalización, Agricultura Ecológica, B. Pedagogía, 40.340 Aranzeta (Euzkadi), info@eco.es, 94 427 16 94, eco.es

Certificado dispuesto en el Artículo 19, Apartado 3, del Reglamento (UE) 2018/848 sobre producción ecológica y etiquetado de productos ecológicos

1. Nombre de la empresa ESTIMADORA ALGEPOSA SA	2. Tipo de operador <input checked="" type="checkbox"/> Operador <input type="checkbox"/> Lugar de producción
3. Operador o grupo de operadores Nombre: ESTIMADORA ALGEPOSA SA Dirección: AVDA. PORTUARIA 104, 20100 PASADIA GIPUZKOA País: España Código postal: 48	4. Autoridad emisora o entidad responsable de control Autoridad: ES AECF 1300008QAM Dirección: Subvenciones y ayudas, Normalización, Consejo de Agricultura y Alimentación Ecológica de España País: España Código postal: 94
5. Fecha de entrada en vigor del certificado y/o de la autorización 21-07-2012	
6. Descripción de la producción o de la actividad de producción, según el artículo 19 del Reglamento (UE) 2018/848 y del presente Reglamento de producción ecológica Producción ecológica de productos de agricultura ecológica	
7. Fecha de vigencia del certificado de conformidad con el Reglamento (UE) 2018/848 para certificar que el operador o grupo de operadores está al día en la subvención de producción ecológica 21-07-2012	
8. Fecha de vigencia del certificado de conformidad con el Reglamento (UE) 2018/848 para certificar que el operador o grupo de operadores está al día en la subvención de producción ecológica 21-07-2012	9. Fecha de vigencia del certificado de conformidad con el Reglamento (UE) 2018/848 para certificar que el operador o grupo de operadores está al día en la subvención de producción ecológica 21-07-2012

2 Presentation of the Environmental Management System

2.1 Description of the Environmental Management System Implemented

The company has been UNE-EN ISO 14001 certified since 2014 for its environmental management system and has fulfilled the requirements of the EMAS Regulation since 2021. This system is integrated with the UNE-EN ISO 9001 quality assurance system, which was initially certified in 1998.

The management system includes documented support based on:

- A management guide: the basic system document which defines the process map, organisation, responsibilities, etc.
- Work procedures: documents that describe the activities, functions and responsibilities of the departments comprising ESTIBADORA ALGEPOSA, S.A.
- Instructions: documents that complement the procedures. Describe in detail the process and aspects of management that ensure efficiency.
- Records: documents which prove the completion of several operations described in the procedures/instructions.

2.2 Management Policy

The ESTIBADORA ALGEPOSA, S.A. management policy is presented below:



INTEGRATED QUALITY, ENVIRONMENT AND OCCUPATIONAL HEALTH AND SAFETY POLICY

Within the framework of its general policy, ALGEPOSA GROUP, a company dedicated to logistics management, has as a priority objective of its management the permanent improvement of its processes and activities, guaranteeing the health and safety of its workers in all aspects related to work and the commitment to protect the environment, for which the Integrated Management System has been established.

All this entails the following:

- To collect and transmit customer specifications effectively.
- To protect the health and safety of workers, subcontractors, visitors and other interested parties.
- To be aware of and comply with applicable legal or regulatory requirements, including occupational health and safety regulations applicable to our activities, as well as voluntary requirements.
- To develop quality improvement with suppliers, promoting mutual understanding of problems, in order to achieve continuous improvement in the quality and reliability of subcontracted products and services.
- To promote continuous improvement in the performance of the integrated system at all levels, and environmental performance, by involving employees in the continuous identification of hazards and assessment of their risks, in order to establish effective measures for their control, eliminating hazards and reducing risks.
- To promote and motivate our personnel in the prevention of occupational risks in all their activities, by means of communication and participation in their control measures, through the established channels.
- To ensure that all personnel in the Company are fully aware of their duties and have the necessary means at their disposal.
- To define objectives and establish the actions to ensure their fulfilment, allocating the necessary resources.
- To promote and guarantee conditions of safety, health and physical, mental and social integrity of workers during the performance of their duties, in order to avoid risks, incidents and occupational diseases.
- To promote and encourage the development of activities aimed at improving quality, safety and the environment.
- To analyse failures and errors in a way that serves to identify and eliminate their causes, thus preventing their repetition in the future.
- To continuously improve the effectiveness of the Integrated Management System itself, through periodic review and audits, to verify and evaluate compliance with the defined objectives and targets.
- To prevent contamination of ALGEPOSA's activities.
- To provide safe and healthy working conditions for the prevention of injury and impairment of the company's personnel.

December 2021
M^a Luisa Guibert
President

2.3 Context and Stakeholders

ESTIBADORA ALGEPOSA, S.A. is aware of the environmental risks and opportunities with its business. This is why ESTIBADORA ALGEPOSA, S.A. conducts an annual assessment allowing it to update these risks and opportunities, evaluating them in order to establish an action plan to manage them.

Actions were taken in 2024 that allowed us to improve productivity and our environmental performance with investments in more environmentally sustainable machinery, an increased storage capacity and maintenance of a constant channel of communication with the Port Authority in order to directly receive complaints from neighbours and the Port Authority itself.

In 2021, ALGEPOSA signed a preliminary collaboration agreement with the Chamber of Commerce and Industry of Gipuzkoa and a well-known environmental consultancy firm, specialized in business sustainability, in order to prepare a Draft of a *Comprehensive Sustainability Strategy 2023-2026*. The plan is defined and approved for the scope of the Algeposa GROUP, so that the different companies that make it up, including ESTIBADORA ALGEPOSA, S.A., can gradually adapt their respective environmental management systems to adhere to and align themselves with this Plan, acquiring the commitment and setting themselves the *Sustainable Development Goals (SDGs)* promulgated by senior management.

The organisation is currently working on the reduction of greenhouse gases.

Both the integration and the development of environmental aspects, related to the minimization of the impact of the carbon footprint, the electrification of resources, infrastructures and the automation and digitalization of processes, are the driving force behind ALGEPOSA's business strategy and its adaptation to the changing environment.

ESTIBADORA ALGEPOSA, S.A. permanently maintains environmental performance indicators (see point 3.1 of this Statement) to understand its evolution.

Sustainable action at ESTIBADORA ALGEPOSA, S.A. is aimed at meeting the needs and expectations of all stakeholders. In doing so, it oversees all activities to minimise their environmental impact in areas such as noise and air emissions while loading/unloading vessels. ESTIBADORA ALGEPOSA has defined a Best Operational Practices guide as a reference for its personnel so they may do their work making the lowest possible environmental impact.

2.4 Description of the Organisation's Significant Environmental Aspects

2.4.1 Direct Significant Environmental Aspects

An Environmental Aspect is any element deriving from the company's activities, products or services that may interact with the environment.

ESTIBADORA ALGEPOSA, S.A. has defined a procedure for identifying and assessing environmental aspects, E03.10, IDENTIFICATION OF ENVIRONMENTAL ASPECTS, considering the *Lifecycle* criteria. It includes the criteria for evaluating the organisation's environmental aspects. The criteria defined for the assessment are:

- Magnitude: assesses the quantity of the aspect against a reference value which may be the prior year or a legal limit.
- Hazardness: the impact of the environmental aspect on the environment and stakeholders.

The direct significant environmental aspects of ESTIBADORA ALGEPOSA, S.A. in 2024 are:

- Consumption: Red diesel
- Consumption: Oil
- Non-hazardous waste: Scrap
- Non-hazardous waste: Plastics
- Hazardous waste: Contaminated packaging
- Hazardous waste: Contaminated material
- Hazardous waste: Aerosols
- Hazardous waste: Sepiolite
- Hazardous waste: Hoses
- Emissions fluorinated gases: R-407 C
- Electricity consumption: scale, hopper and gangway

Aspect	Process	Impact
Consumption: red diesel	Machinery use/maintenance	Decrease in natural resources
Consumption: oil	Machinery use/maintenance	Decrease in natural resources
Non-hazardous waste: scrap	Goods handling	Soil pollution
Non-hazardous waste: plastics	Goods handling	Soil pollution
Hazardous waste: contaminated containers	Machinery maintenance	Soil pollution
Hazardous waste: aerosols	Machinery maintenance	Soil pollution
Hazardous waste: sepiolite	Machinery maintenance	Soil pollution
Hazardous waste: tubes	Machinery maintenance	Soil pollution
Emissions fluorinated gases	Climate control	Air pollution
Electricity consumption: scale, hopper and gangway	Goods handling	Decrease in natural resources

2.4.2 Indirect environmental aspects

The indirect significant environmental aspects are those over which ESTIBADORA ALGEPOSA, S.A. has no direct control yet may have an influence. They are mainly related to air pollution:

Process	Aspect	Impact
Product/goods transport from/to the port facilities	Air emissions: GHG	Air pollution
Transfer of waste	Air emissions: GHG	Air pollution
Subcontracted maintenance tasks*	Generation of waste	Soil pollution
Machinery end of service life	Generation of HW and NHW	Soil pollution

These indirect aspects are controlled with legal documentation and certificates held by our subcontractors in addition to the operational oversight we conduct with the Best Practices such as covering lorries with canvases when transporting bulk products, for example. We monitor our subcontractors to ensure a minimal environmental impact by their activities.

(*) The significant indirect aspects are those linked to the supply of tools for lifting loads and the maintenance of the vehicle fleet itself.

2.5 Environmental Management System

2.5.1 Objectives 2024

The environmental targets defined for 2024 and their degree of compliance are set out below:

Objective 1: A reduction of electricity consumption in the Maintenance workshop of 10%

Deadline: December 2024

- Action: Changing to LED, automated auto switch-off system
- **Assessment:** 10.5% reduction in electricity consumption has been achieved). LED luminaires were installed in addition to monitoring the rational use of electricity.

Objective 2: 25% reduction in cleaning sludge generation

Deadline: December 2024

- Action 1: Improving Good Machine Cleaning Practices (Training)
- Action 2: Change of wet cleaning system and removal of solids before washing.
- **Assessment:** waste generation has been reduced by 33%. Through good practices, dry cleaning of the machinery and collection of the generated dirt, less dirt reaches the settler.

Objective 3: Emission reductions in Steel discharges (25%)

Deadline: June 2025

- Action: Purchase of a Mantsinen 300
- Action: Purchase of mafis and locotractor
- Action: Self-propelled Mobile Crane Training
- Action: Mantsinen 300 Specific Training
- Action: Mafis / locotractor Specific Training
- **Assessment:** the actions have been carried out. Emission reductions due to the new way of handling goods will have to be assessed in 2025.

2.5.2 Objectives 2025

Objective 1: A reduction of electricity consumption in Warehouses 4 of 5%

Deadline: December 2026

- Actions: Development of warehouse optimisation software

Objective 2: Emission reductions in Steel discharges (25%)

Deadline: June 2025

- Action: equipment procured in 2024 will be put into operation. (See objective 3 of 2024)

Objective 3: Decrease of Contaminated material hazardous waste by 5%

Deadline: December 2025

- Actions: Staff awareness-raising
- Carrying out a simulation exercise

The company has set specific actions aimed at the self-consumption of Warehouse No. 4 project and, next year 2026, it will set goals and this objective will be quantified.

3 Description of the Organisation's Environmental Performance

3.1 Indicators

What follows are the most representative indicators of our activities pursuant to the Regulation requirements.

The indicators defined shall be assessed based on the following parameter of activity: tonnes handled.

The tonnes handled at the Pasaia Port in the last three years have been the ones expressed in the following table.

	2022	2023	2024
<i>Ton handled (tonnes)</i>	1,291,656	1,140,243	1,160,391

3.1.1 Oil consumption

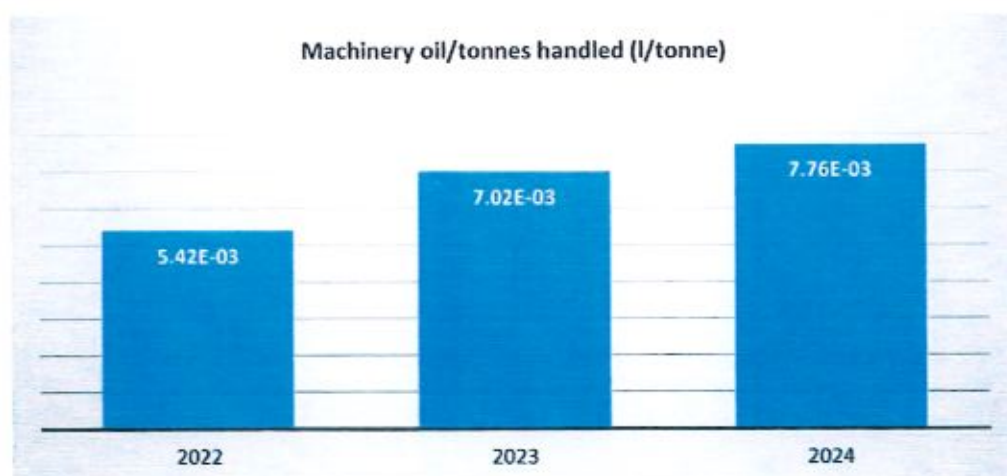
The consumption of oil, hydraulic and motor oil, for machinery is based on the purchase of the oil.

Purchases made in recent years are shown in the following table:

	2022	2023	2024
<i>Machinery oil (litres)</i>	7,000	8,000	9,000

Activity is measured in tons handled, being the values of recent years:

	2022	2023	2024
<i>Ton handled (tonnes)</i>	1,291,656	1,140,243	1,160,391



Although the maintenance of equipment is being improved and oil leaks from machinery are being controlled, the market situation influences the purchase of oil. Sometimes it is necessary to make a larger purchase to ensure the availability of this product.

3.1.2 Energy consumption

3.1.2.1 Red diesel consumption for machinery

The consumption of red diesel for goods handling machinery in the last few years is expressed in the following table:

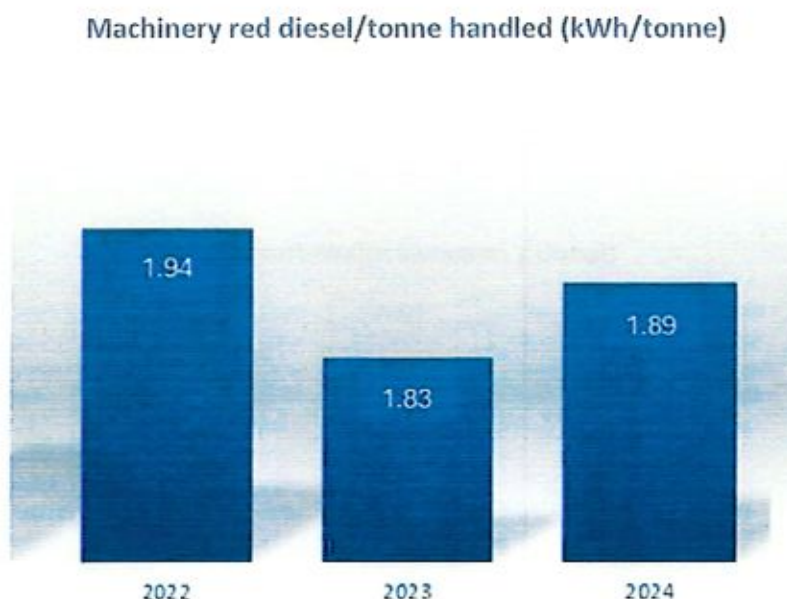
	2022	2023	2024
<i>Machinery red diesel (l)</i>	243,305	202,390	213,461
<i>Machinery red diesel (kWh)</i>	2,506,0436	2,084,620	2,198,651

Litres of diesel-kWh conversion factor 10.30.

Source: MITECO-IDAE. Guide to Compliance with the MENAE Platform Lines of Action (2019)

	2022	2023	2024
<i>Ton handled (tonnes)</i>	1,291,656	1,140,242	1,160,391

The evolution in the consumption of red diesel based on the activity (Ton. handled) is represented in the following graph:



3.1.2.2 White Diesel Fuel Consumption for Vehicles

The consumption of white diesel for vehicles in the last few years is expressed in the following table:

	2022	2023	2024
Vehicle white diesel (litre)	6,293	5,309	4,268
Vehicle white diesel (kWh)	64,816	54,684	43,965

Litres of diesel-kWh conversion factor 10.30.

Source: MITECO-IDAE. Guide to Compliance with the MENAE Platform Lines of Action (2019)

	2022	2023	2024
Ton handled (tonnes)	1,291,656	1,140,242	1,160,391

3.1.2.3 Electricity Consumption

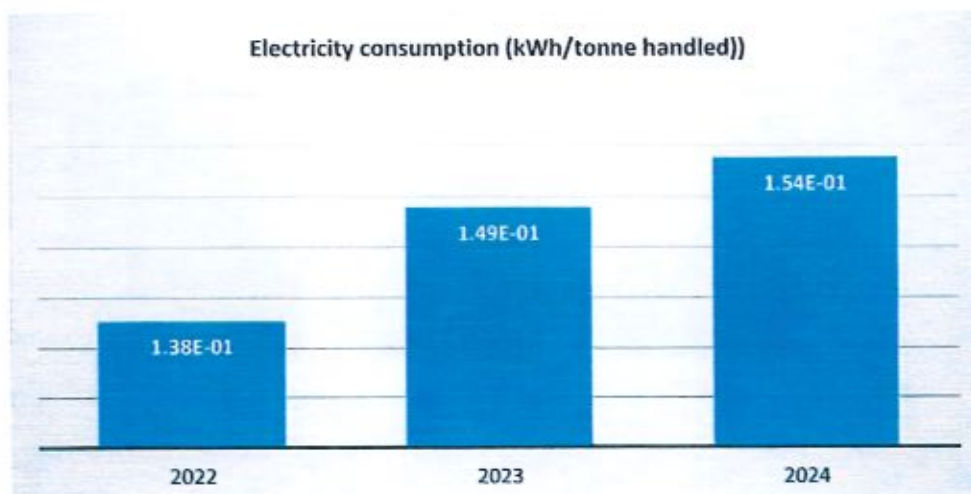
The consumption of electricity comes from:

- Lighting for facilities, offices and warehouses and auxiliary systems
- The use of cranes outside and inside

	2022	2023	2024
Electricity (kWh)	177,916.00	169,870.66	178,541.5

Activity is measured in tons handled, being the values of recent years:

	2022	2023	2024
Ton handled (tonnes)	1,291,656	1,140,243	1,160,391



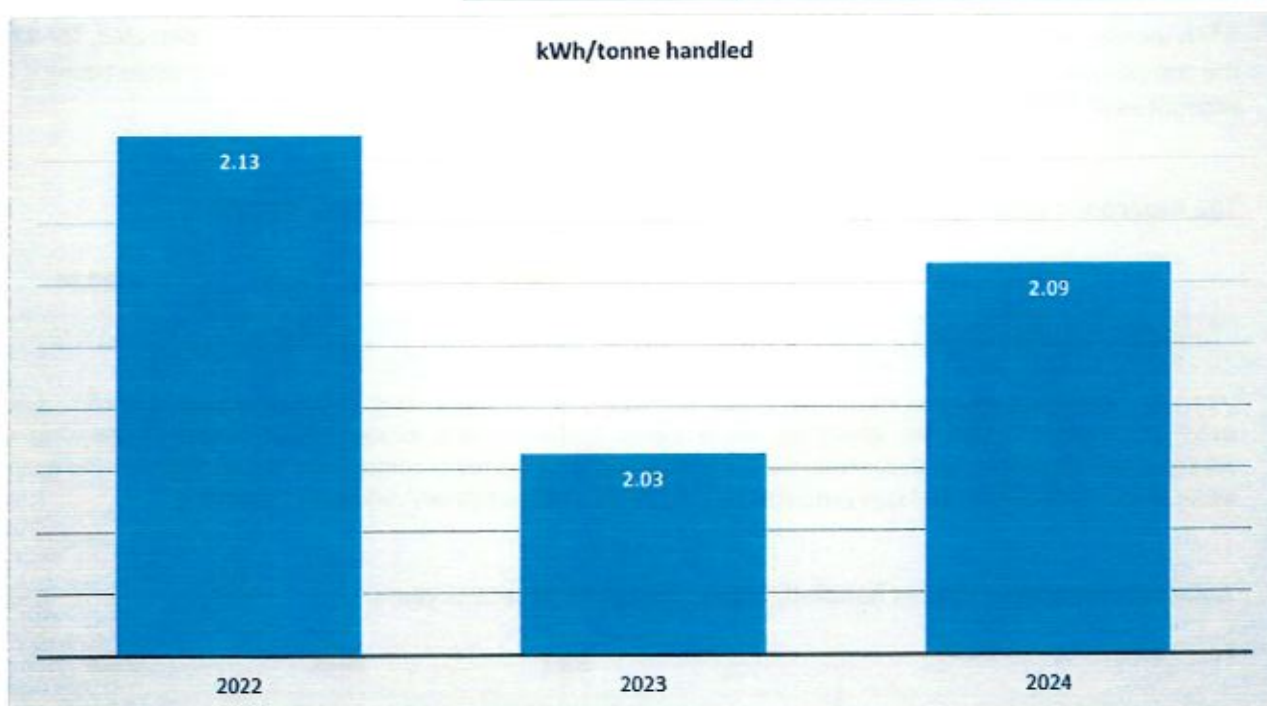
3.1.2.4 Total Energy Consumption

The following table shows the values of the basic EMAS indicator, as per Regulation no. 2018/2026, considering the total kWh of electricity and diesel fuel per tonne of goods handled for the years 2020, 2022, 2023 and 2024:

	2022	2023	2024
Total energy (kWh)	2,748,774	2,309,175.20	2,421,157.46

Activity is measured in tons handled, being the values of recent years:

	2022	2023	2024
Tonnes handled (tonnes)	1,291,656	1,140,243	1,160,391



In conclusion, the total energy consumption has increased mainly due to the increase in red diesel consumption. This increase was due to several reasons: longer use of diesel cranes rather than electric ones, and increased internal movement of some goods for logistical reasons. It is important to note that the company has contracted 100% of its electricity supply in its concessions, with a certificate of guaranteed origin from renewable sources, while the supply it receives directly in offices and workshops, which is supplied by the Port Authority, has a 50% guarantee of renewable origin.

3.1.3 Generation of waste

3.1.3.1 Generation of hazardous waste

Main hazardous waste is generated when doing maintenance on the machinery used for ESTIBADORA ALGEPOSA S.A. activities. This HW is mainly:

	2022	2023	2024
Cleaning sludge (kg)	4,580	28,500 (*)	4,380
Residual oil (kg)	5,980	3,955	3,507
Contaminated material (kg)	577	325	1,175 **
Contaminated filters (kg)	1,120	899	685

**An increase in the managed quantity of Hazardous waste - "contaminated material" is detected, for which the company will carry out a better "operational control", with awareness raising initiatives, while taking it into account as a "*Minimisation objective*".

The hazardous waste generated in the last few years is shown in the following table:

	2022	2023	2024
Total hazardous waste (kg)	13,258	12,833 (*)	11,446

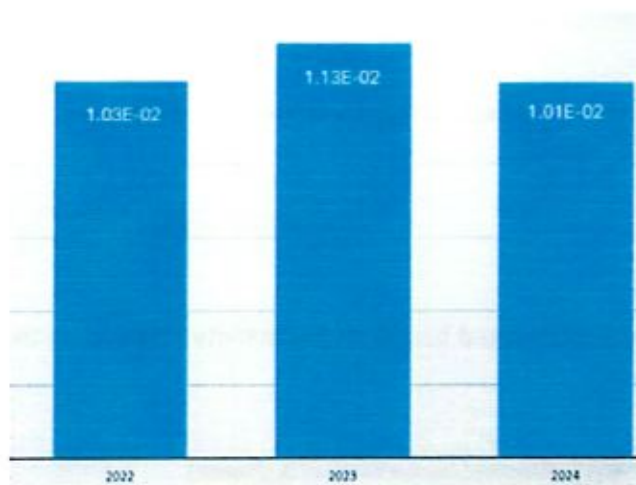
(*) NOTE: "Abnormal" situation outside the company's activity. In 2023, as a result of torrential rains in the first quarter, which accumulated outside the Workshop, where the oil sludge settler is located, 22,020 tonnes of rainwater were collected, contaminated with sludge from the settler that had to be treated as coming from the settler itself. This quantity, added to the 6,480 tonnes of sludge generated by the activity itself, completely distorts this indicator.

Activity is measured in tons handled, being the values of recent years:

	2022	2023	2024
Ton handled (tonnes)	1,291,656	1,140,243	1,160,391

The hazardous waste generated in the last few years based on the activity is shown in the following graph:

Total hazardous waste/tonne handled (kg/t)



In general, filter and waste oil management has improved over the last three years, with downward trends.

Improved cleaning systems, with more dry cleaning, mean that less waste ends up in the settler. As a result, cleaning sludge, the largest amount of hazardous waste generated, has decreased.

3.1.3.2 Generation of non-hazardous waste

The non-hazardous waste generated comes from the activities inherent to goods handling, both loading and unloading as well as storage and handling. The main types are:

	2022	2023	2024
Scrap (kg)	48,080	41,950	61,260
Wood (kg)	740,530	476,940	547,520
Sweeping Debris (kg)	188,080	145,610	142,450

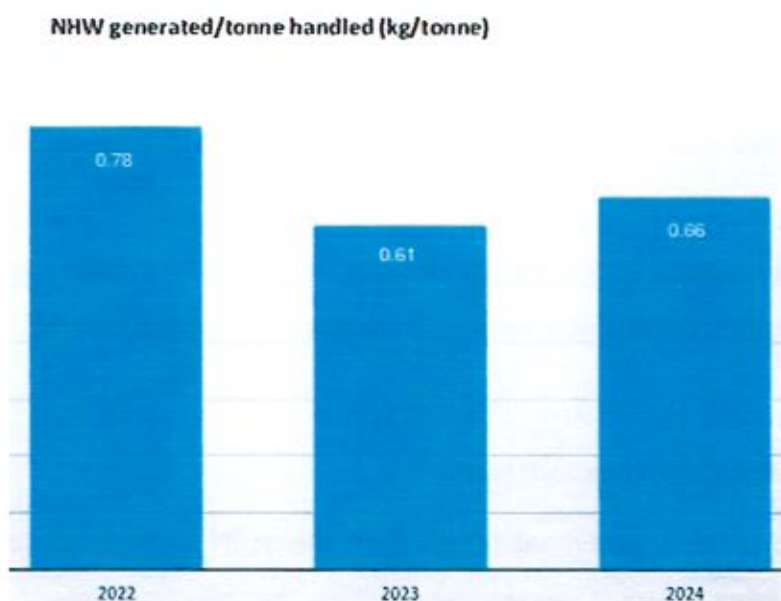
The non-hazardous waste generated in the last few years is shown in the following table:

	2022	2023	2024
Total non-hazardous waste (kg)	1,008,085.00	692,949.00	761,600.00

Activity is measured in tons handled, being the values of recent years:

	2022	2023	2024
Ton handled (tonnes)	1,291,656	1,140,243	1,160,391

The non-hazardous waste generated based on the activity is shown in the following graph:



The start of new steel product traffic, which generates a lot of wood waste, has meant that wood waste has increased considerably.

3.1.4 Water consumption

The consumption of water comes from:

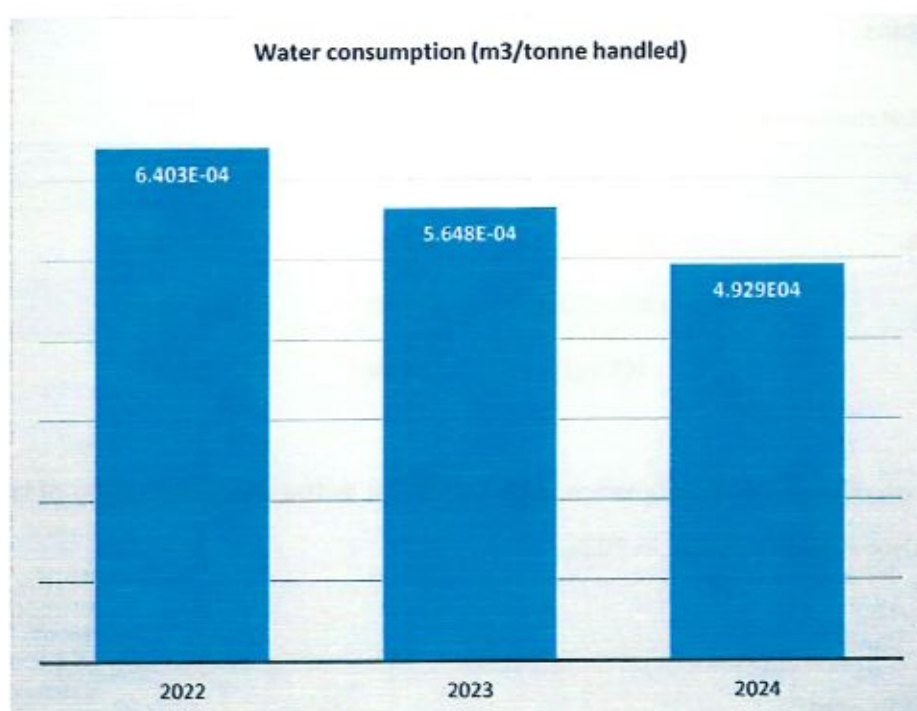
- Sanitary use in changing rooms
- Machinery cleaning

The consumption of water in recent years has been:

	2022	2023	2024
Water consumption (m ³)	827	644	572

Activity is measured in tons handled, being the values of recent years:

	2022	2023	2024
Ton handled (tonnes)	1,291,656	1,140,243	1,160,391



Improved water use in the cleaning of machinery, with more dry cleaning, has meant that water consumption has been significantly reduced. The improvement has been due to the effectiveness of the Good Practices carried out by the staff performing this task in the Workshop.

3.1.5 Discharge

3.1.5.1 Faecal water discharge from changing rooms

Faecal water is discharged into the Pasaia Port Authority sewage system as ESTIBADORA ALGEPOSA has the corresponding authorisation.

3.1.5.2 Water discharge from the maintenance shop

The discharge from the oil separator in the maintenance shop is discharged into the Pasaia Port sewage system, always maintaining the parameters below the limits established by *Aguas de Añarbe*.

ESTIBADORA ALGEPOSA, S.A. has carried out in 2024, according to the environmental calendar it has defined, a measurement of the quality of the water discharged into the sewage system, the result being in accordance with the requirements that apply to it. Other analyses are planned on a regular basis, or if there is a change in the conditions of the Activity.

The analytics done by an independent laboratory, accredited by ENAC, in July 2024 reflected the following results:

Physical/chemical characteristic	Añarbe limits	2020	2023	2024
pH	5.5-9.5	7.7	7.9	5.6
Suspended solids	600 mg/l	36 mg/l	7.1 mg/l	99 mg/l
COD	1,800 mgO ₂ /l	39 mgO ₂ /l	18.9 mgO ₂ /l	315 mgO ₂ /l
Oil and grease	100 mg/l	<5 mg/l	<5 mg/l	3.2 mg/l

There were no changes in maintenance shop activity or in the characterisation of the goods handled by ESTIBADORA ALGEPOSA, S.A. in 2024.

3.1.6 Air Emissions

ESTIBADORA ALGEPOSA air emissions come from:

- Diesel fuel in vehicles and machinery used for the company's activities
- Bulk unloading

Minimum values for CH₄ and N₂O emissions are generated.

No HFCs, PFCs, NF₃ y SF₆ is emitted.

3.1.6.1 Greenhouse Gas Air Emissions

Greenhouse gas air emissions come from:

- Energy consumption
- Use of diesel fuel in vehicles and machinery
- Cooling gas recharges

In 2024, a refilling of the greenhouse gas, R407C, of 0.5 kg has been carried out.

The electricity consumed by ALGEPOSA, supplied by our energy supplier, as well as that supplied by the port authority, both have a Certificate of Guarantee of Origin.

The emission factors used are referenced in the MITECO Calculator 2007-2023:

https://www.miteco.gob.es/content/dam/miteco/es/cambio-climatico/temas/mitigacion-politicas-y-medidas/calculadora_hc_tcm30-485617.xlsx

Using, for 2024, the data declared in this same source, in 2023.

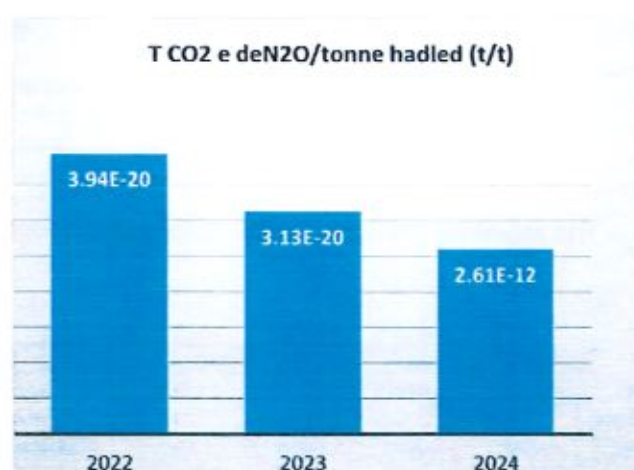
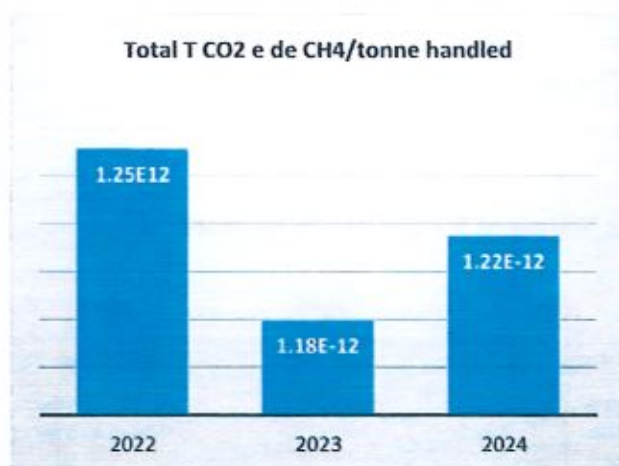
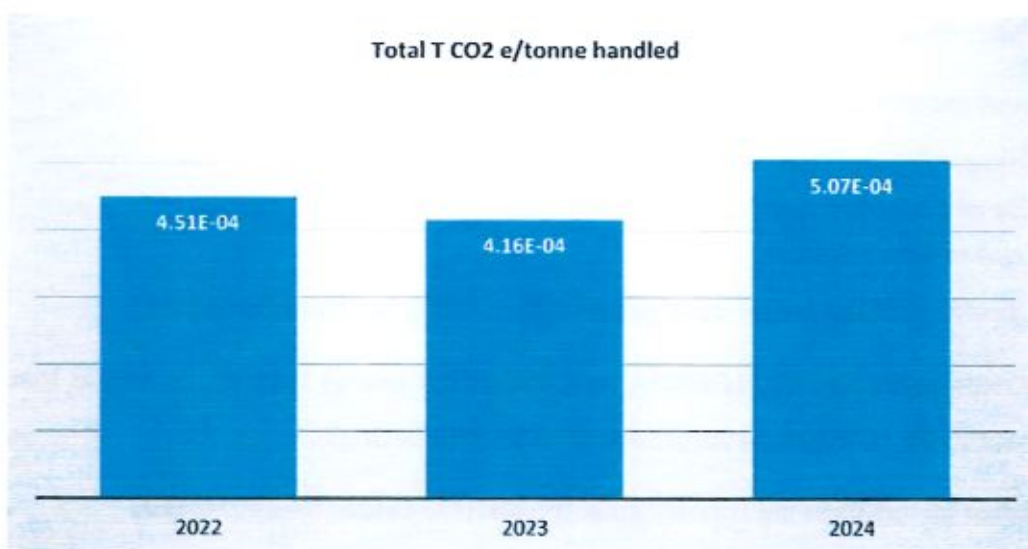
The following table shows the total greenhouse gas emissions for the last three years:

	2022	2023	2024
T CO2 e	582.5510	474.7439	588.0562
T CO2 e de CH4	1.6166E-06	1.3453E-06	1.4102E-06
T CO2 e de N2O	5.0848E-14	3.5686E-14	3.0260E-14

Activity is measured in tons handled, being the values of recent years:

	2022	2023	2024
T Ton handled (tonnes)	1,291,656	1,140,243	1,160,391

The greenhouse gas emissions based on tonnes handled are shown in the following graph:

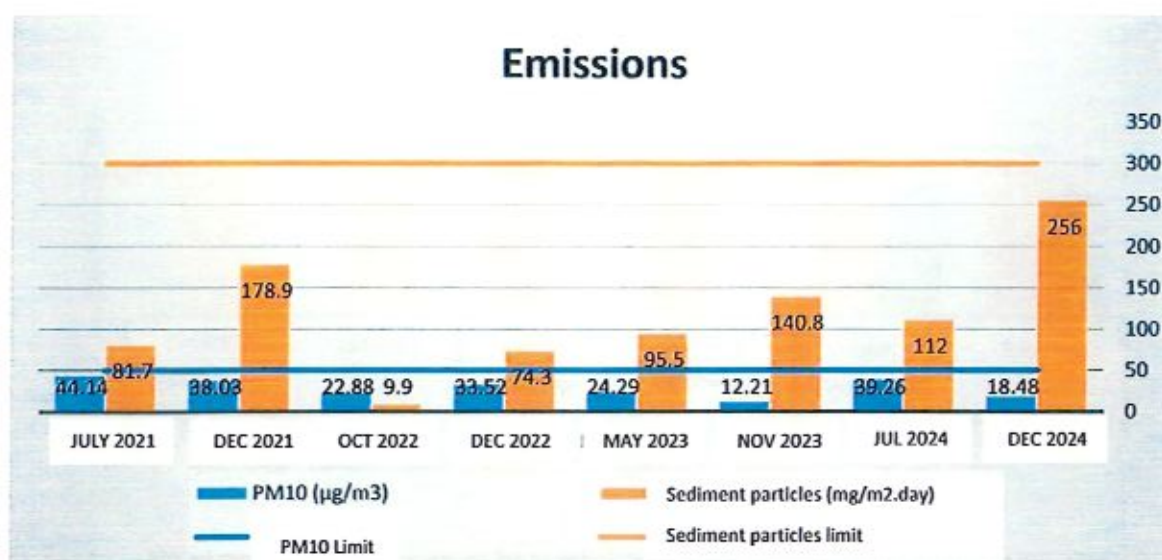


The increase in emissions in the year 2024 has been caused by increased consumption of diesel fuel for machinery and the existence of a small leak of fluorinated gas.

3.1.6.2 Air Emissions due to bulk unloading

ESTIBADORA ALGEPOSA, S.A. has authorisation for Activities that are Potentially Air Polluting.

The measurements by an authorised control agency in the last years are shown in the following graph:



In each of the PM10 particle measurements, 3 samples are taken and averaged, the result being within the established limits. It should be noted that neither of the two measurements for PM10 particulate matter exceeded the limit value of 50 µg/m3.

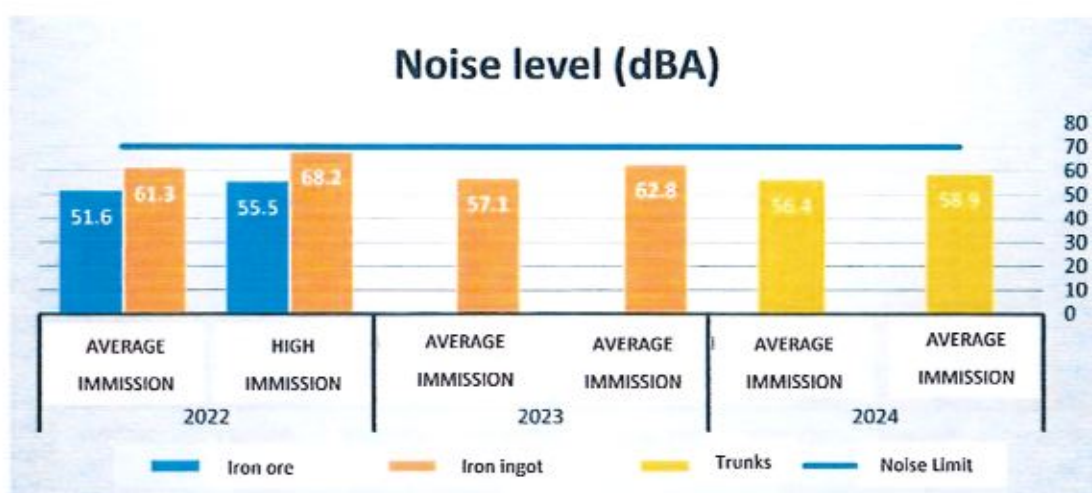
3.1.7 Noise

The ESTIBADORA ALGEPOSA, S.A. activities at Pasaia Port, an urban area, generate noise both when loading and unloading good as well as when transporting them. The activities are performed in accordance with the technical and timetable requirements defined by the Pasaia Port Authority.

ESTIBADORA ALGEPOSA, S.A. has a noise measurement plan based on the type of goods handled.

The new machinery complies with CE marking noise levels and all corresponding laws.

In 2024 a noise measurement has been carried out at the log unloading operations. Previously and as shown in the graph, measurements were taken at two operations that are considered to have a significant acoustic impact on the environment: unloading of iron ingots and unloading of ferrous ore. The measurement was carried out at the Lezo dock operation, and was measured in the urban area Lezo. The results of the measurements did not exceed the limit established by RD 1367/2007 (70 dBA).



Given the relevance of the impact since the Port is located in an urban area and in view of the local population, the company has defined a programme to measure its noise during operations that may generate noise to the outside.

3.1.8 Soil use

The ESTIBADORA ALGEPOSA, S.A. activities are performed at Pasaia Port. The facilities used are on concessions.

100% of the soil is paved or asphalted.

The surface area occupied by the ESTIBADORA ALGEPOSA facilities as of December 2022 are shown in the following table:

Facilities 2024	Surface area (m ²)
Offices	648
Warehouse 1	2.524
Warehouse 2	2.524
Warehouse 4	10.500
Warehouse 6bis	2.603
Warehouse 8, 9, 10	2.703
Machinery maintenance shop	1.693
Changing rooms	358
Scale	440
Diesel fuel tanks	92
Loading adjustment gangway	180

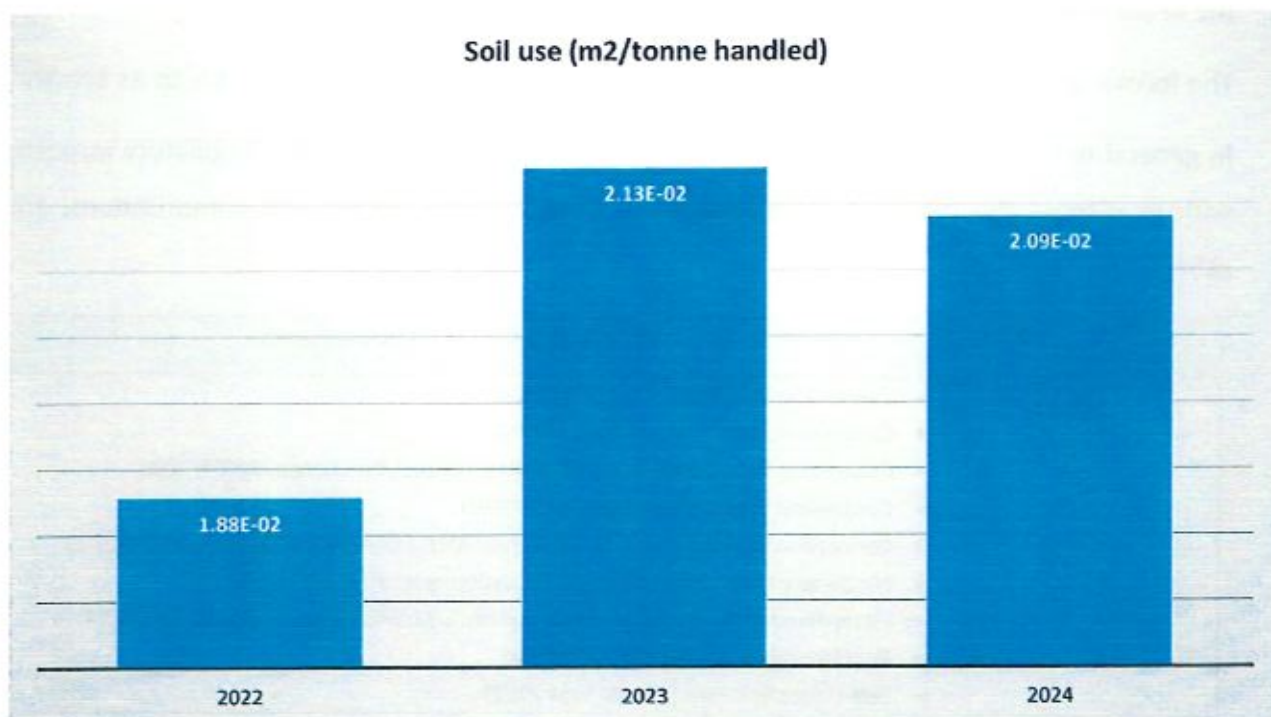
Warehouses 1 and 2 were not included in 2019 as they were added in 2020. Warehouses 4 and 5 were unified in 2021, with warehouse 4 increasing from 6,300 m² to 10,500 m², and warehouse 5 disappearing.

Soil use in relation to biodiversity is expressed in the following table:

Soil use in relation to biodiversity	2022	2023	2024
Total soil use (m ²)	24,265	24,265	24,265
Total sealed surface area (m ²)	24,265	24,265	24,265
Total surface area in the centre oriented by type (m ²)	0	0	0
Total surface area outside the centre oriented by type (m ²)	0	0	0

Activity is measured in tons handled, being the values of recent years:

	2022	2023	2024
<i>Ton handled (tonnes)</i>	1,291,656	1,140,242	1,160,391



4 Degree of Compliance with Environmental Law

In a context of ever more demanding environmental laws, a lack of knowledge or non-compliance with legal requirements may be a risk to ESTIBADORA ALGEPOSA, S.A. and its environment.

The identification and subsequent evaluation of the requirements applicable to ESTIBADORA ALGEPOSA, S.A. makes it possible to establish actions to ensure compliance, which avoids or minimizes the risks that may arise from non-compliance with a given requirement and, on the other hand, improves the performance of the organization by taking advantage of the opportunities that may arise.

In order to keep this risk under control, ESTIBADORA ALGEPOSA, S.A. identifies the laws published every quarter which may apply to the organisation and evaluates compliance annually. It identifies and evaluates local laws as well as regional, national and European laws.

The company has all the environmental permits and authorisations necessary to engage in its operations. The activities carried out by ESTIBADORA ALGEPOSA, S.A. are performed in compliance with the current European, national, regional and local environmental legislation in force, as well as the requirements subscribed voluntarily.

The following is a summary of the results of the analysis of the legislation applicable to its activity:

In general terms, evidence of compliance is provided and verified, including regulatory inspections, with or without the intervention of Authorised control bodies (OCAs) and authorisations, among others.

	Laws and Other Requirements
Activity	<ul style="list-style-type: none"> • Concession Warehouse 1: 31/12/2024 • Concession Warehouse 2: 31/12/2024 • Concession Warehouse 4: 12/02/2004 / Concession Change: 30/07/2020 • Concession Warehouse 6 bis: 14/12/2010 • Concession Warehouses 8, 9, 10: 22/09/2010 / Concession Change: 11/10/2023 • Machinery shop: 01/04/2018 / Concession extension 20/11/2023 • Hazardous waste producer authorisation: EU3/5483/2013 M-01-24: 14/06/24 • Port Operations Technical Instruction • Self-Protection Plan (rev. 10 Sept 2022)
Energy Transition and Climate Change	Law 1/2024, of 8 February, on Energy Transition and Climate Change. (Official Basque Country Gazette No. 38, 21/2/24)
Firefighting systems	Spanish Royal Decree 513/2017, of 22 May, which approves the Firefighting System Regulation. (Official Spanish Gazette No. 139, 12/6/17)

	Laws and Other Requirements
Diesel fuel tanks	<p>Decree 5/1996 which approves the Industrial Establishment Regulator Rules for the Autonomous Region of the Basque Country and the system for installation, expansion and transfer. (Official Basque Country Gazette No. 27, 7/02/1996)</p> <p>ORDER of 9 January 2008, from the Regional Ministry of Industry, Commerce and Tourism, which regulates the electronic procedure for commissioning thermal systems in buildings, gas recipients, the storage of liquified petroleum gases and tower cranes for construction and other uses. (Official Basque Country Gazette No. 24, 4/02/2008)</p> <p>Spanish Royal Decree 1523/1999 of 1 Oct. (amending Spanish Royal Decree 2085/1994 of 20 Oct, Oil Facility Regulation, Spanish Royal Decree 1427/1997 of 15 Sept, Complementary Technical Instruction MI-IP 03 and Spanish Royal Decree 2201/1995 of 28 Dec, Complementary Technical Instruction MI-IP 04). (Official Spanish Gazette No. 253, 22/10/1999)</p> <p>Decree 29/2015, of 17 March, on the commencement of industrial activities and the Industrial Register. (Official Basque Country Gazette No. 80, 4/05/2015)</p> <p>Spanish Royal Decree 706/2017, of 7 July, approving complementary technical instruction MI-IP 04 "Vehicle Supply Facilities" and regulating certain aspects of the oil facility regulation. (Official Spanish Gazette No. 183, 2/08/2017)</p>
Safety Officer	Spanish Royal Decree 97/2014, of 14 February, regulating hazardous goods transport by road in Spanish territory. (Official Spanish Gazette No. 70, 27/2/2014)
Soils	<p>LAW 4/2015, of 25 June, on the prevention and correction of soil pollution (Official Basque Country Gazette no. 123, 2/7/2015)</p> <p>DECREE 209/2019, of 26 December, implementing Law 4/2015, of 25 June, on the prevention and correction of soil pollution</p> <p>Law 7/2022 of 8 April, on waste and contaminated soils for a circular economy (Official Spanish Gazette No. 85, 9/4/2022)</p>
Noise	<p>Spanish Royal Decree 102/2011, of 28 January, on improving air quality. (Official Spanish Gazette No. 52, 01/03/2002)</p> <p>Spanish Royal Decree 1367/2007, of 19 October, implementing Law 37/2003, of 17 November, on Noise, as refers to acoustic zoning, quality goals and acoustic emissions. (Official Spanish Gazette No. 254, 23/10/2020)</p>
Air emissions	<p>Spanish Royal Decree 102/2011, of 28 January, on improving air quality. (Official Spanish Gazette No. 25, 29/01/2011)</p> <p>Decree 278/2011, of 27 December, regulating facilities where activities are undertaken which may be air polluting (Official Basque Country Gazette No. 15, 23/01/2012)</p>
Discharge	<i>Aguas del Añarbe</i> Sewage and Discharge Regulation (Gipuzkoa Official Gazette No. 100, 29/05/2006)
Hazardous waste	Law 7/2022 of 8 April, on waste and contaminated soils for a circular economy. (Official Spanish Gazette No. 85, 9/04/2022)

	Laws and Other Requirements
	Spanish Royal Decree 553/2020, of 2 June, regulating the transfer of waste inside the Spanish territory (Official Spanish Gazette No. 171, 19/06/2020)
Vehicles at the end of their service life	Spanish Royal Decree 265/2021, of 13 April, on vehicles at the end of their service life which amends the General Vehicle Regulation, approved by Spanish Royal Decree 2822/1998, of 23 December. (Official Spanish Gazette No. 89, 14/04/2021)
EMAS	<p>COMMISSION REGULATION (EU) 2017/1505 of 28 August 2017 amending Annexes I, II and III to Regulation (EC) no. 1221/2009 of the European Parliament and of the Council, on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS) (EU Official Gazette 28/08/2017)</p> <p>COMMISSION REGULATION (EU) 2018/2026 of 19 December 2018 amending Annex IV to Regulation (EC) No. 1221/2009 of the European Parliament and of the Council, on the voluntary participation by organisations in a community eco-management and audit scheme (EMAS)</p> <p>REGULATION (EC) No. 1221/2009 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 November 2009 on the voluntary participation by organisations in a community eco-management and audit scheme (EMAS), repealing Regulation (EC) No. 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC</p>

5 Other Environmental Performance-Related Factors

5.1 Communications with External Stakeholders

ESTIBADORA ALGEPOSA, S.A. maintains constant communication with the Pasaia Port Authority through periodic meetings of the Environmental Affairs Work Group.

Stakeholders	Expectations/Needs	Stakeholders	Expectations/Needs
Property	<ul style="list-style-type: none"> Economic profitability Group image Legal compliance Environmental commitment 	Service providers and works	<ul style="list-style-type: none"> Supplier loyalty Installation payments Ease of work and cooperation with the company Activity / Compliance CAE / Safe working conditions Environmental commitment
Address	<ul style="list-style-type: none"> Financial capacity Economic profitability Safe working conditions. No accidents/incidents Environmental commitment 	City Councils in the area/ Provincial Council/ Basque Government	<ul style="list-style-type: none"> Reconciliation with the environment Legislative compliance Wealth generation Decarbonization of activity
Port Authority	<ul style="list-style-type: none"> Respect for the environment and the surroundings New traffic Payment of fees Increased traffic volume Safe working conditions Participation/solutions Environmental commitment 	Shipowners	<ul style="list-style-type: none"> Price: low scale account Correct stowage process
Professional associations (ADE CONJA, GUIPORT, ANEXCO)	<ul style="list-style-type: none"> Participation/solutions Environmental commitment 	Addressee (endemic customer)	<ul style="list-style-type: none"> Goods delivered on time, in the agreed form and conditions
Customers	<ul style="list-style-type: none"> Meeting deadlines No impact on loading/unloading Detailed and up-to-the minute information on the status of the ship and goods Eco / GMP+ certified animal feed customers Commitment to the environment 	Neighbours	<ul style="list-style-type: none"> Working in an environmentally friendly way Clean water sheet
Competition	<ul style="list-style-type: none"> Collaboration on environmental issues and SSL 	EPIC workers	<ul style="list-style-type: none"> Implemented CAE Safe working conditions Participation and communication Change Sopap to CPE (Impact)
Company staff (and their family environment)	<ul style="list-style-type: none"> Appropriate management system Attitude/attitude assessment system Organizational management Environmentally responsible company Safe and healthy working conditions (health, training/information on the risks of the job, provision of PPE) Compliance with Law 31/95 Environmental commitment 	Trade unions	<ul style="list-style-type: none"> Safe working conditions Information
		Other Port users: Guardia Civil, vessel crime, port authority staff, other	<ul style="list-style-type: none"> Safe working conditions
		Prevention Delegations	<ul style="list-style-type: none"> Information and Participation Safe working conditions
		OSALAN/Labour Inspectorate	<ul style="list-style-type: none"> Legal compliance
		CPA / Mutualities	<ul style="list-style-type: none"> Compliance with the Defined Criteria Communication
		Safety Office	<ul style="list-style-type: none"> Compliance with the defined instructions
		No Certifiers	<ul style="list-style-type: none"> Compliance with Standards Maintenance of Certification

Two environmental communications were received from the port authority in 2024. The communications received relate to dust emissions in the unloading operation from ship to lorry, through the hopper (09/09/24), and spillage of bulk solids on the road, due to incorrect closure of the lorry box (03/10/24). The port authority was answered completely, providing solutions to the demands raised, collaborating with the *Port Control Centre* to identify and transfer the perpetrators of these incidents, in order to prevent them from happening again, transferring, if necessary, the costs generated, for example, in the cleaning of roads.

With the definition of Best Operational Practices, ESTIBADORA ALGEPOSA, S.A. has established the way to operate in accordance with the type of goods to be handled, always seeking the lowest possible environmental impact from its activities and best working conditions for its personnel.

It should be noted that there have been no cases of activity stoppages or sanctions by the port authority or other public administrations associated with non-compliance with the Good Operating Practices that the organisation has disseminated and implemented.

5.2 Personnel Participation

ESTIBADORA ALGEPOSA, S.A. has implemented an *internal intranet* for communication and participation. This *blog* talks about areas of the environmental management system in addition to providing news in this field. The *blog* is also used so ESTIBADORA ALGEPOSA, S.A. personnel may actively contribute and/or make contributions on environmental or other topics, all pursuant to the procedure E2 50 COMMUNICATION. There is also a *Suggestions Box*, which employees can use, visibly or anonymously, for the same purpose.

The company's management holds periodic meetings with department managers to discuss environmental and other issues. This forum promotes environmental improvement initiatives that are then developed and implemented in the different processes.

ALGEPOSA also participates in social events promoted by its stakeholders and organised in the surrounding area, creating bridges and improving relations with the Pasaitarra Bay, as is the case of the Pasaia Itsas Festibala, held in May 2024. This is a meeting and participation place for employees, customers and other stakeholders.

In 2024 ALGEPOSA has participated in the publication of *ATLAS DE LA EMPRESA COMPROMETIDAS DE EUSKADI*, La sostenibilidad de las empresas vascas.

In collaboration with the *PV Mobility Cluster*, *Algeposa Pasaia* has participated in a European *AIBC Clusters* project that develops Resilience Plans in companies from different sectors, with *Estibadora Algeposa* occupying the space of the logistics sector.

From the *Algeposa Pasaia Resilience Plan* resulting from the collaborative project, it is possible to analyse the most relevant aspects to be taken into account in our sector related to the adverse effects that climate change generates in our activity.

With this first approach, we aim to raise awareness, promote reflection and offer a seed for the development of tools that will allow us to mitigate this impact and overcome any crisis caused by high-impact atmospheric phenomena.

We hope it will be of interest to participate with proposals to improve our environmental performance. During this year we will implement training, promote initiatives and launch awareness-raising campaigns on Climate Change.

5.3 Environmental Improvement Actions

In 2024 the environmental improvements completed were:

- The switch to a LED system in the machinery shop: for the purpose of reducing energy consumption, improving environmental conditions for work.
- Acquisition of new work equipment, such as a hybrid crane and optimised vehicles, in order to improve operational efficiency and reduce energy consumption in the handling of goods. Strategic investment aligned with the Sustainability and Decarbonisation project (*Eco Terminal*).
- Creation of a new internal communication tool, which opens an agile channel for participation, an increase in employee awareness is expected through the implementation of initiatives, led by the organization, of an environmental nature that promote and establish awareness habits towards the environment. An on-line, physical and anonymous Suggestion Box is available to collect the proposals and/or concerns of Employees regarding the IMS implemented in the company.
- Return to the client of the dunnage used in the handling of their goods, at the initiative/proposal of the Port Operations Department.
- Improvement in machinery cleaning systems to reduce water consumption.
- Installation of removable warehouses, which reduce the carbon footprint by bringing this new storage space closer to the edge of Buenavista Quay.

By 2025 it is planned to:

- Improve the operation of the ship-warehouse trawl movement with the use of *mafis* to reduce air emissions and diesel consumption. Strategic investment aligned with the Sustainability and Decarbonisation project (*Eco Terminal*).
- Promote the use of rail, as opposed to road transport, in the distribution of goods. Strategic investment aligned with the Sustainability and Decarbonisation project (*Eco Terminal*).
- Improve the management of the maintenance of the machinery used.
- Improvement in the truck loading system, avoiding waiting time for trucks and reducing emissions.

Since 2014, when ALGEPOSA implemented an Environmental Management System, in accordance with the UNE EN ISO 14001 Standard, the company has maintained and improved in successive renewals, its Best Operational Practices, an authentic compendium that brings together the ITOP (Technical Instruction of Port Operations) of the Pasaia Port and the Guide of Good Practices in the Handling of Solid Bulks in Port Facilities.

This internal document serves as a *vademecum* for the organization, from the dock quay to the office, including warehouses and workshops, where the knowledge and commitment acquired by its personnel with the environment and the minimization of environmental impact is put into practice in the development of its logistic-port activity.

These *Best Operational Practices* are based on the best available techniques, both organizational and in terms of work teams, and serve as support to guarantee minimum emission levels, which undoubtedly results in the eternal and ambitious port-city conciliation.

From an operational model that controls the most significant environmental aspects, through the correct handling of loads, their containment and arrangement in the fields or during transport, to the use of the best adapted tools for emission control (equipment with particle capturing humidification systems, optimized hoppers, port anti-spill tools), without forgetting the continuous improvement of operational processes, including informing and training in good practices, disseminating and reminding workers of good environmental habits, monitoring all operations likely to have an adverse impact on the ecosystem, while calling for individual and collective participation through sustainability initiatives that promote the good development of the company's environmental performance.

With our sights set on the global challenge of achieving an environmentally viable development, challenges that we share with our customers and suppliers, ALGEPOSA has set concrete objectives through:

- an efficient, viable and responsible natural resource management
- the integration of environmental criteria into the growth strategy and decision making of the organization
- a minimization of negative impacts and the prioritization of positive impacts on the environment, as well as on the economic and social development of the environment where we interact and operate, and to whose wellbeing ALGEPOSA is committed to continue contributing.

5.4 Date of the Next Environmental Statement

The 2024 environmental statement (January-December) revision 2 has been verified by LRQA ESPAÑA, S.L.U. which holds accredited verifying body no. ES-V-0015, by verifier Cristina Dominguez.

LRQA Legal representative signing the Statement: Olga Rivas

The next Statement for year 2025 will be submitted for validation in the first quarter of 2026.

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ANA PILAR
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APARICIO BERMEJO ANA
PILAR - 71435333R
DN: c=ES,
serialNumber=IDCES 71435
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BERMEJO, cn=APARICIO
BERMEJO ANA PILAR -
71435333R
Date: 2025.06.17 13:49:15
+0200

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Doña Ana P. Aparicio Bermejo,
Traductora-Intérprete Jurada de inglés
nombrada por el Ministerio de Asuntos
Exteriores, Unión Europea y Cooperación,
certifica que la que antecede es traducción
fiel y completa al inglés de un documento
redactado en español.
En León (España) a 17/06/2025

Ms Ana P. Aparicio Bermejo,
Sworn Translator-Interpreter of English
appointed by the Ministry of Foreign
Affairs, European Union and Cooperation,
certifies that the foregoing is an accurate,
complete English translation
of a document drafted in Spanish.
In León (Spain) on 17/06/2025



