18023690Q OLGA RIVAS (R: B86612140)
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ESTIBADORA ALGEPOSA, S.A.

Pasaia Port

ENVIRONMENTAL STATEMENT

January-December: Year 2022

(Fuente: APP)

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

Average workforce in 2022: 26

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

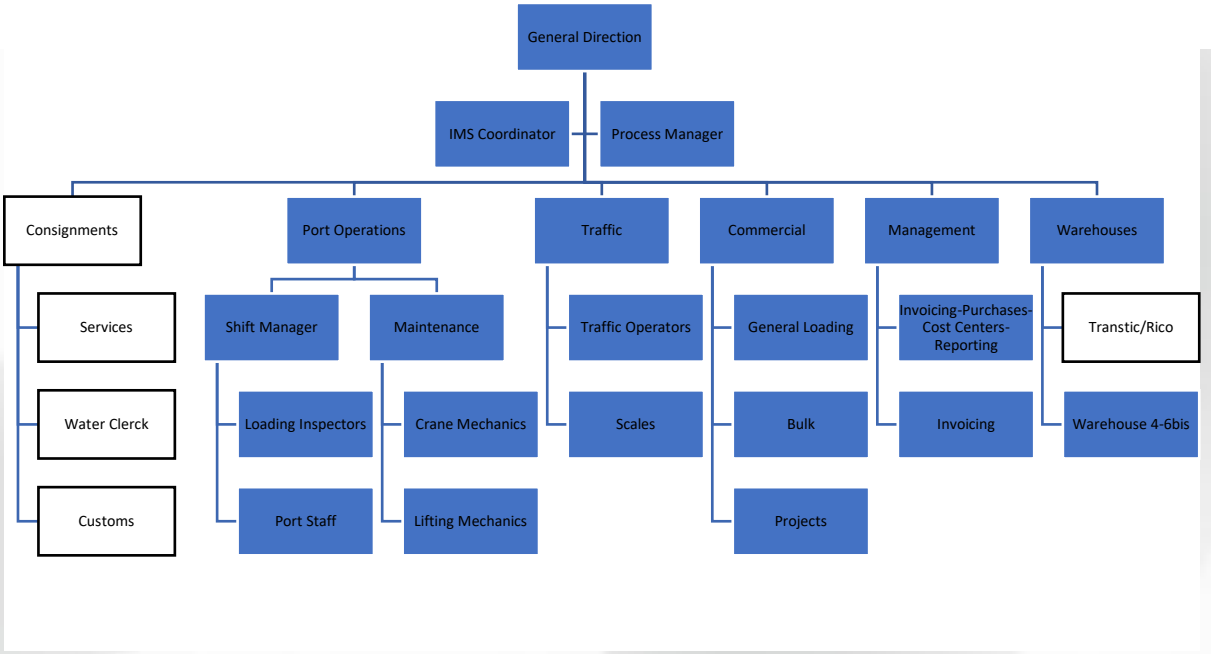
In addition to other complementary facilities such as: changing rooms, a scale, 20 and 40 m^3 diesel fuel tanks and a loading adjustment gangway. Warehouse 4 was joined to 5 in 2021.

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

Copyright 2021 Google Maps

1.4 Organisation Chart

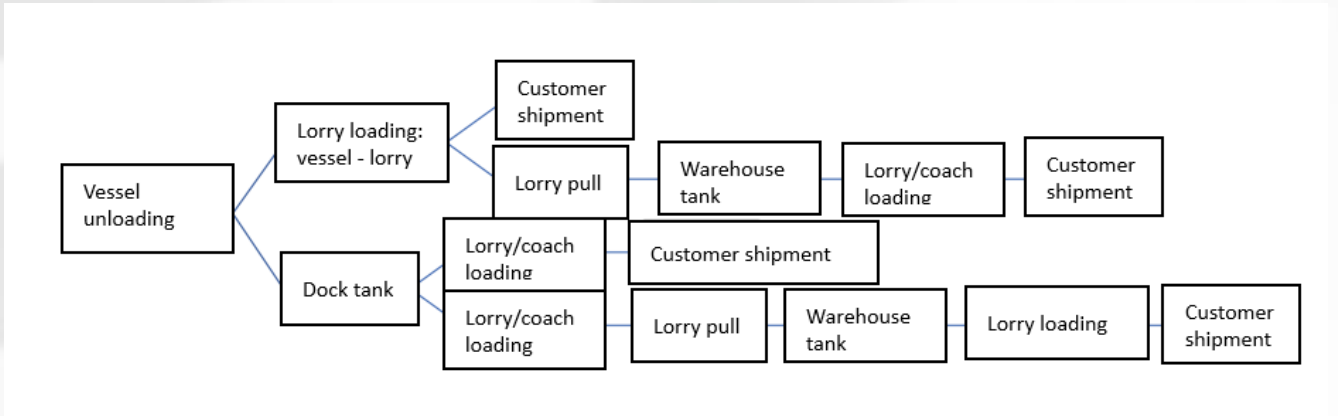
The ESTIBADORA ALGEPOSA, S.A. organisation is reflected in the following organisation chart:



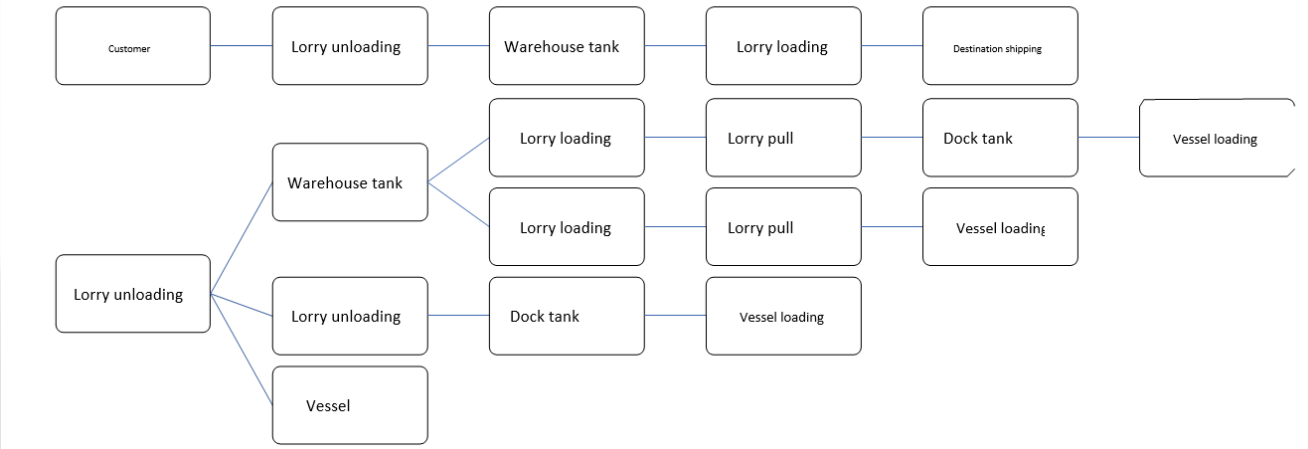
Blue indicates the part of the organisation affected by this Statement.

1.5 Activity Flow Chart

PRODUCT UNLOADING FLOW CHART



PRODUCT LOADING FLOW CHART



1.6 Machinery

(Fuente: Grupo Algeposa)

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

Identification	Machine	No. Units
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

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.

Lloyd's Register

Certificado de Aprobación

Certificamos que el Sistema de Gestión de :

Estibadora Algeposa, S.A.

Edificio Consignatarios, Planta Baja, 20110 Pasajes, Gipuzkoa, España

ha sido aprobado por LRQA de acuerdo con las siguientes normas:

ISO 9001:2015

Gilles Bessiere - Area Technical Manager

Emitido por: Lloyd's Register Quality Assurance España, S.L.U.

en nombre de: Lloyd's Register Quality Assurance Limited

Este certificado forma parte de la aprobación identificada con el número de aprobación: 0034725

Fecha de Emisión Actual: 4 Marzo 2019
Fecha de Caducidad: 1 Marzo 2022
Número de Certificado: 10177348

Aprobaciones Originales:
ISO 9001 – 13 Mayo 1998

Números de Aprobación: ISO 9001 – 0034725-001

El alcance de esta aprobación es aplicable a:
Gestión de operaciones portuarias. Gestión de transporte por carretera. Gestión de transporte por ferrocarril. Almacenaje y distribución de mercancías.

UKAS MANAGEMENT SYSTEMS 001

Lloyd's Register

Fecha de Emisión Actual: 24 Julio 2020
Fecha de Caducidad: 23 Julio 2023
Número de Certificado: 10277809

Aprobaciones Originales:
ISO 14001 - 24 Julio 2017

Certificado de Aprobación

Certificamos que el Sistema de Gestión de:

ESTIBADORA ALGEPOSA, S.A.

Edificio Consignatarios, Planta Baja, 20110 Pasajes, Gipuzkoa, España

ha sido aprobado por Lloyd's Register de acuerdo con las siguientes normas:

ISO 14001:2015

Números de Aprobación: ISO 14001 – 00010462

El alcance de esta aprobación es aplicable a:
Gestión de operaciones portuarias, Gestión de transporte por carretera, Gestión de transporte por ferrocarril, Almacenaje y distribución de mercancías.

Daniel Oliva Marcílio de Souza

Area Operations Manager - South Europe

Emitido por: Lloyd's Register Quality Assurance España, S.L.U.

en nombre de: Lloyd's Register Quality Assurance Limited

UKAS MANAGEMENT SYSTEMS 001

Lloyd's Register

Fecha de Emisión Actual: 21 Septiembre 2020
Fecha de Caducidad: 1 Marzo 2022
Número de Certificado: 10293073

Aprobaciones Originales:
ISO 45001 - 21 Septiembre 2020

Certificado de Aprobación

Certificamos que el Sistema de Gestión de :

Estibadora Algeposa, S.A.

Edificio Consignatarios, Planta Baja, 20110 Pasajes, Gipuzkoa, España

ha sido aprobado por Lloyd's Register de acuerdo con las siguientes normas:

ISO 45001:2018

Números de Aprobación: ISO 45001 – 0041538-001

Este certificado forma parte de la aprobación identificada con el número de aprobación: 0041538

El alcance de esta aprobación es aplicable a:
Gestión de operaciones portuarias, Gestión de transporte por carretera, Gestión de transporte por ferrocarril, Almacenaje y distribución de mercancías.

Daniel Oliva Marcílio de Souza
Area Operations Manager – South Europe
Emitido por: Lloyd's Register Quality Assurance España, S.L.U.
en nombre de: Lloyd's Register Quality Assurance Limited

UKAS 001

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DNV

PROCESS CERTIFICATE

Certificate no.: 10000419756-MSC-GMP+-ESP
Initial certification date: 29 August 2021
Valid: 29 August 2021 – 26 August 2024
GMP+ International registration number: GMP053053

ESTIBADORA ALGEPOSA, S.A.

Edificio de Consignatarios, S7N,20110, Gipuzcoa, Gipuzcoa, Spain

and the sites as mentioned in the appendix accompanying this certificate

DNV Business Assurance B.V. declares that there is justifiable confidence that the processes **storage and transshipment of feed** at the participant ESTIBADORA ALGEPOSA, S.A. comply with the applicable requirements and conditions of the standard GMP+ B3 Trade and Collection and Storage & Transshipment of the GMP+ FC scheme (based on GMP+ C6) of GMP+ International.

Place and date:
Barendrecht, 25 October 2021

For the issuing office:
DNV Business Assurance B.V.
(GMP+ Int. reg. no: C0800027)
Zwolseweg 1, 2994 LB Barendrecht,
Netherlands

Sabrina Bianchini
Management Representative

Lack of fulfilment of conditions as set out in the Certification Agreement may render this Certificate invalid.
DNV Business Assurance B.V., Zwolseweg 1, 2994 LB, Barendrecht, Netherlands - TEL: +31 102922689.

Agencia Tributaria
www.agenciatributaria.es

Departamento de Aduanas e II.EE.

N.I.F: A20540399 Referencia: ES12000058

Certificado OEA	ES AEOF 13000049QM (Número de certificado)
1. Titular del certificado OEA ESTIBADORA ALGEPOSA SA Número(s) de IVA: ESA20540399	2. Autoridad emisora: ES0000DA Mª Pilar Jurado Borrego

El titular mencionado en la casilla 1 es

Operador Económico Autorizado

- ☐ - Simplificación aduanera
- ☐ - Protección y seguridad
- ☒ - Simplificación aduanera/Protección y seguridad

3. Fecha de entrada en vigor del certificado :	31-07-2013

Lloyd's Register

Ref. SGI00001334

Asunto Guía de Buenas Prácticas Ambientales de Puertos del Estado

Fecha: 7 de Julio 2021

Lloyd's Register Quality Assurance España, S.L. (LRQA), declara que una vez realizada la auditoría de evaluación del sistema de gestión ambiental realizada en fechas 17 y 18 de Junio de 2021, se ha comprobado que la empresa,

- ✓ **ESTIBADORA ALGEPOSA, S.A.**

Cumple con:

- Guía de Buenas Prácticas Ambientales publicada en la resolución de 31 de marzo de 2011 de la Dirección de Planificación y Desarrollo de Puertos del Estado.
- Y las condiciones establecidas en:
  Convenio entre la Autoridad Portuaria de Pasajes y la empresa Estibadora Algeposa, S.A. de fecha 3 de Junio de 2019

Aplicable a sus instalaciones de:

Edificio Consignatarios, Planta Baja,

20110, Pasajes, Guipúzcoa

España

Y para que así conste se emite la presente declaración, con validez de un año a partir de la fecha de la auditoría de evaluación,

Firma:

Lloyd's Register Group Limited, its affiliates and subsidiaries, including Lloyd's Register Quality Assurance Limited (LRQA), and their respective officers, employees or agents are, individually and collectively, referred to in this clause as 'Lloyd's Register'. Lloyd's Register assumes no responsibility and shall not be liable to any person for any loss, damage or expense caused by reliance on the information or advice in this document or howsoever provided, unless that person has signed a contract with the relevant Lloyd's Register entity for the provision of this information or advice and in that case any responsibility or liability is exclusively on the terms and conditions set out in that contract.
Emitido por: Lloyd's Register Quality Assurance España, S.L.U., ED.C/ Princesa, 29, 1º 28008 Madrid Spain

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Euskadiko Nekazaritza eta Elikadura Ekologikoaren Kontseilua
Consejo de Agricultura y Alimentación Ecológica de Euskadi

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

El Consejo de Agricultura y Alimentación Ecológica de Euskadi, es la Autoridad de Control de la producción ecológica en Euskadi y se encuentra autorizado en la Unión Europea con código: ES-ECO-026-VAS, en aplicación del régimen de control definido en el Reglamento (UE) N° 2018/848 del Consejo, de 30 de mayo de 2018, sobre producción y etiquetado de los productos ecológicos, posteriores modificaciones y ampliaciones.

El servicio de certificación del Consejo, certifica que:

- ✓ La persona o empresa abajo indicada (operador) se encuentra inscrita en el registro de operadores de Producción Agraria Ecológica de Euskadi con el número: 2148 en la sección/es: comercialización, importación.
- ✓ Tras evaluar el sistema de autocontrol del operador, inspeccionar el proceso productivo y en su caso tomar muestras, se ha concedido la licencia de uso de la marca para utilizar las menciones protegidas de producción ecológica, según lo establecido en el procedimiento de certificación del Consejo.
- ✓ El operador se encuentra al corriente del pago de las tasas establecidas.

Nombre y dirección del operador:

Estibadora Algeposa SA
A20540399
Zona Portuaria.Edif.Consignatario.Planta Baja
20100 PASAIA GIPUZKOA

Actividad principal: comercialización

Actividades y/o productos certificados por el Consejo	*Desde*
Primer destinatario:	09/05/2019
Soja:	
Distribución sin marca:	09/05/2019
Soja:	
Producción simultánea no ecológica (Reg.(UE) 2018/848 art. 9)	
Primer destinatario:	
Otra soja sin calificación ecológica:	
Distribución sin marca:	
Otra soja sin calificación ecológica:	

Periodo de validez desde 30/12/2022 hasta la fecha 31/01/2024

Ultima fecha de control 24/11/2022

Emitido en Amorebieta-Etxano a 30 de Diciembre del 2022
X.Lejarzegi
Consejo AE

Acceda a la página web www.ekolurra.eus/certificados/2148_Certificado_C para visualizar el original

Euskadiko Nekazaritza eta Elikadura Ekologikoaren Kontseilua
Consejo de Agricultura y Alimentación Ecológica de Euskadi
Jauregibarria auzoa 4, 1º solairua
48.340 Amorebieta - Etxano (Bizkaia) - Tel.: 94 627 15 94
IFK/CIF: Q2000531J

El presente certificado de conformidad ha sido expedido sobre la base del artículo 35 del Reg. (UE) nº 2018/848 y está sujeto a posibles modificaciones. El certificado en vigor debe ser consultado en la página web del Consejo ekolurra.eus

NE Kontseilua, Jauregibarria Auzoa, 4 - 1ºsolairua, 48340 Amorebieta-Etxano(Bizkaia). info@ekolurra.eus 946 271 594 ekolurra.eus

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:

ALGEPOSA GRUPO

POLÍTICA INTEGRADA DE CALIDAD, MEDIO AMBIENTE Y SEGURIDAD Y SALUD LABORAL

Dentro del marco de su política general, ALGEPOSA GRUPO, empresa dedicada a la gestión logística, tiene como objetivo prioritario de su gestión la mejora permanente de sus procesos y actividades, garantizando la seguridad y salud de los trabajadores en todos los aspectos relacionados con el trabajo y el compromiso de proteger el medioambiente, para lo cual se ha establecido el Sistema de Gestión Integrado.

Todo esto conlleva:

- Recoger y transmitir eficazmente las especificaciones de los clientes.

- Proteger la seguridad y salud de los trabajadores, subcontratistas, visitas y demás partes interesadas.

- Conocer y cumplir los requisitos legales ó reglamentarios que sean de aplicación, incluyendo la normativa de seguridad y salud en el trabajo aplicable a nuestras actividades, así como los requisitos que voluntariamente se suscriben.

-Desarrollar la mejora de calidad con los proveedores, promoviendo la mutua comprensión de los problemas, para conseguir una mejora continua de la calidad y fiabilidad de los productos y servicios subcontratados.

-Promover la mejora continua en el desempeño del sistema integrado a todos los niveles, y el comportamiento ambiental, involucrando a los empleados en la identificación continua de peligros y evaluación de sus riesgos, con el fin de establecer medidas eficaces para su control, eliminando los peligros y disminuyendo los riesgos.

-Promover y motivar a nuestro personal en la prevención de riesgos del trabajo en todas sus actividades, mediante la comunicación y participación en las medidas de control de los mismos, a través de los cauces establecidos.

-Asegurar que todo el personal en la Empresa conozca perfectamente sus funciones y disponga de los medios necesarios.

-Definir objetivos y establecer las acciones que aseguren su cumplimiento, asignando los recursos necesarios.

-Fomentar y garantizar las condiciones de seguridad, salud e integridad física, mental y social de los trabajadores durante el ejercicio de sus funciones, con el fin de evitar riesgos, incidentes y enfermedades profesionales.

-Promover y potenciar el desarrollo de actividades dirigidas a la mejora de la calidad, de la seguridad y del medio ambiente.

-Analizar los fallos y errores de manera que sirva para determinar y eliminar sus causas, evitando así su repetición en el futuro.

-Mejorar continuamente la propia eficacia del Sistema de Gestión Integrado, mediante su revisión periódica y a través de auditorías, para verificar y evaluar el cumplimiento de los objetivos y metas definidos.

-Prevenir la contaminación de las actividades de ALGEPOSA.

-Proporcionar condiciones de trabajo seguras y saludables para la prevención de lesiones y deterioro del personal de la empresa

Diciembre 2021
Mª Luisa Guibert
Presidente

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 2021 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.

Last year, 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*.

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 2022 are:

- Oil consumption
- Non-hazardous waste-wood
- Hazardous waste-oil
- Hazardous waste-contaminated material
- Hazardous waste-filters
- Hazardous waste-tubes
- Emissions: fluorinated gas
- Noise: unloading of iron ingots
- Electricity consumption: machinery shop
- Electricity consumption: hopper

Aspect	Process	Impact
Oil consumption	Machinery use/maintenance	Decrease in natural resources
Non-hazardous waste: wood	Goods handling/storage	Soil pollution
Hazardous waste: oil	Machinery use/maintenance	Soil pollution
Hazardous waste: contaminated material	Machinery maintenance	Soil pollution
Hazardous waste: filters	Machinery maintenance	Soil pollution
Hazardous waste: tubes	Machinery maintenance	Soil pollution
Emissions: fluorinated gas	Machinery maintenance	Air pollution
Noise: unloading of iron ingots	Goods handling	Noise pollution
Electricity consumption: machinery shop	Machinery maintenance	Decrease in natural resources
Electricity consumption: hopper	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.

2.5 Environmental Management System

2.5.1 Objectives 2022

The following objectives have been defined for 2022:

Objective 1: A reduction of electricity consumption in Warehouses 8, 9 and 10 of 10%

Indicator: kWh/ton handled

Deadline: June 2022

Action: the installation of a LED system and control system for turning on warehouse lights

Assessment: in 2022, warehouse 9 had no activity. The lights were changed to LEDs in warehouse 9, postponing the rest of the changes to 2023. Electricity consumption in these warehouses was reduced by 62%.

Objective 2: A reduction of port sweeping debris waste generation (40%)

Indicator: % (2021 port sweeping debris/2022 port sweeping debris)

Deadline: December 2022

Actions: the acquisition of elements that prevent goods spilling

Assessment: the generation of sweeping debris has decreased by 29%. The use of good operational practices, improvement in the use of equipment results in less waste generation.

Objective 3: The carbon footprint calculation for ESTIBADORA ALGEPOSA services

Indicator: achieved/not achieved

Deadline: December 2022

Actions: determination of the service to be measured, carbon footprint calculation, service certification

Assessment: not completed. Calculation is scheduled for 2023.

2.5.2 Objectives 2023

The following objectives have been defined for 2023:

Objective 1: A reduction of electricity consumption in Warehouses 8, 9 and 10 of 10%

Deadline: December 2023

Action: Change to LEDs

Objective 2: The carbon footprint calculation for ALGEPOSA services

Deadline: December 2023

Action 1: Carbon footprint calculation

Action 2: Definition and implementation of improvement actions

Objective 3: Decrease of noise generation in unloading of iron ingots (-10 dBA)

Deadline: June 2023

Actions: installation of noise dampening equipment, Best Practices, BATs, among others

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.

Of the 650,000 tons of coils that have left our facility, it should be noted that 20% of this transport has been by rail. These "tons of steel moved by rail" means a lower impact of CO2 emissions, by eliminating the transport of goods by road, an initiative aligned with the company's commitment to minimize the Carbon Footprint. The trend for this more sustainable mode of transport is clearly growing.

	2020	2021	2022
Ton handled (tonnes)	1,085,049	1,287,699	1,291,656

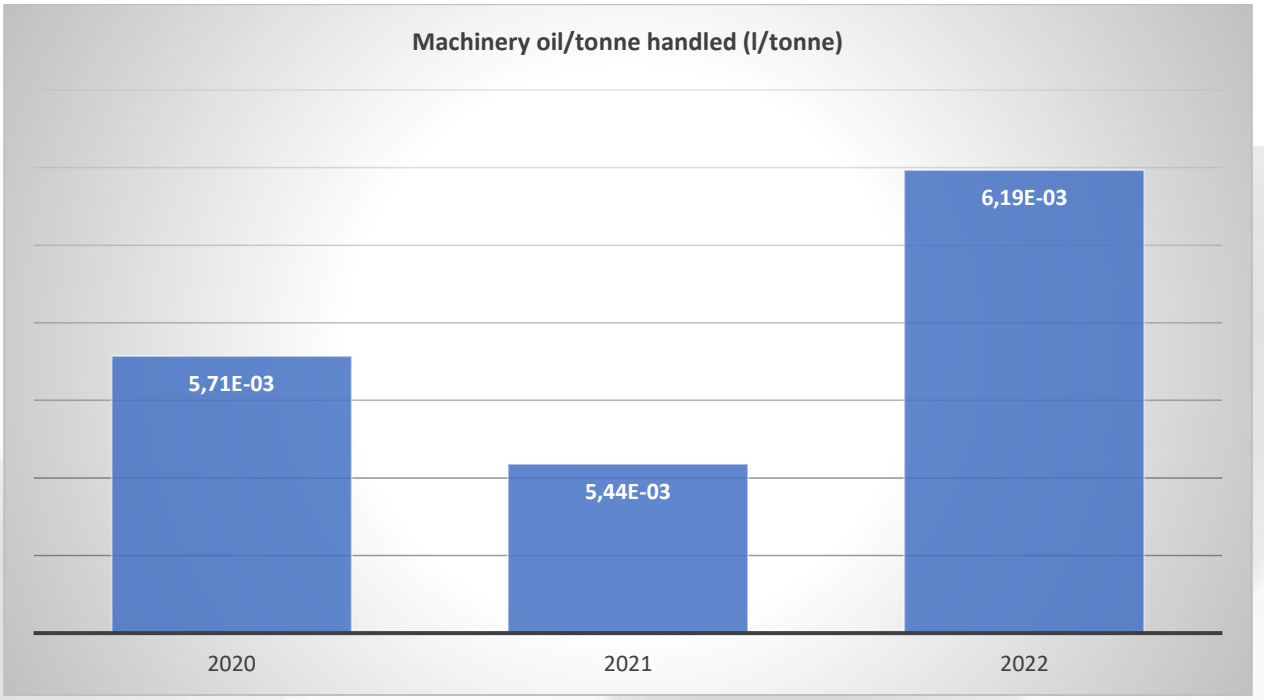
3.1.1 Oil consumption

The consumption of oil for machinery in the last few years is expressed in the following table:

	2020	2021	2022
Machinery oil (litres)	6,200	7,000	8,000

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

	2020	2021	2022
Ton handled (tonnes)	1,085,049	1,287,699	1,291,656



The increase in machinery maintenance requirements due to the increase in grain traffic has resulted in higher oil purchases.

3.1.2 Energy consumption

3.1.2.1 Red diesel consumption for machinery

(Fuente: Garay)

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

	2020	2021	2022
Machinery red diesel (l)	194,305	261,661	253,538
Machinery red diesel (kWh)	2,001,346	2,695,109	2,611,442

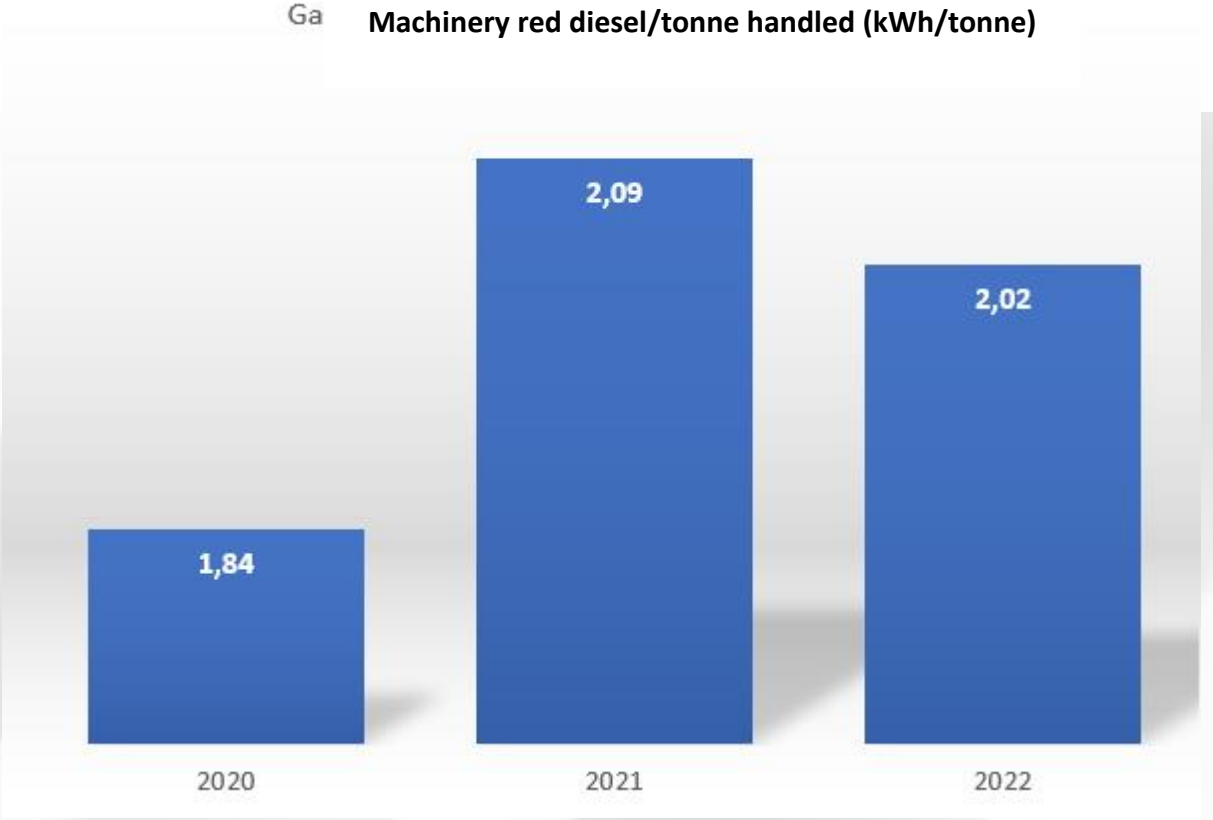
Litres of diesel-kWh conversion factor 10.30.

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

	2020	2021	2022
Ton handled (tonnes)	1,085,049	1,287,699	1,291,656

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

Ga **Machinery red diesel/tonne handled (kWh/tonne)**



3.1.2.2 White Diesel Fuel Consumption for Vehicles

(Fuente: El economista)

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

	2020	2021	2022
Vehicle white diesel (litre)	5,793	6,682	6,293
Vehicle white diesel (kWh)	59,672	68,828	64,816

Litres of diesel-kWh conversion factor 10.30.

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

	2020	2021	2022
Ton handled (tonnes)	1,085,049	1,287,699	1,291,656

Vehicle white diesel/tonne handled (kWh/tonne)

3.1.2.3 *Electricity Consumption*

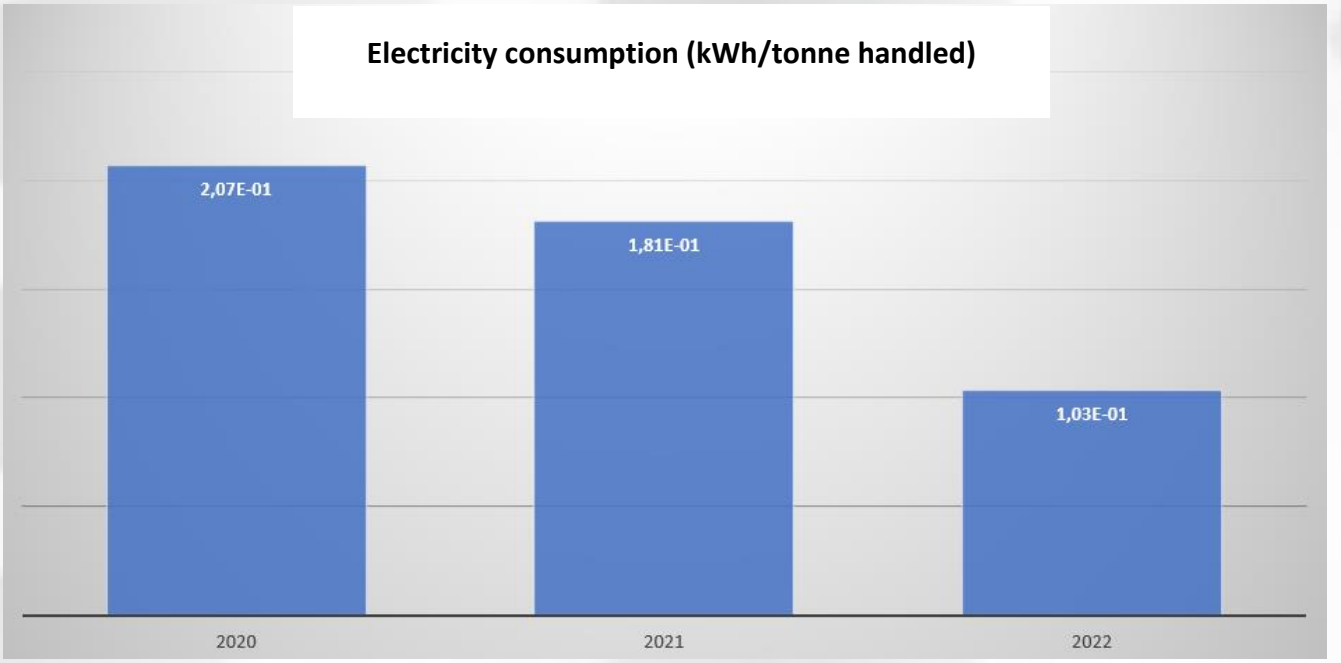
The consumption of electricity comes from:

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

	2020	2021	2022
Electricity (kWh)	224,401.59	233,493.71	133,356.00

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

	2020	2021	2022
Ton handled (tonnes)	1,085,049	1,287,699	1,291,656



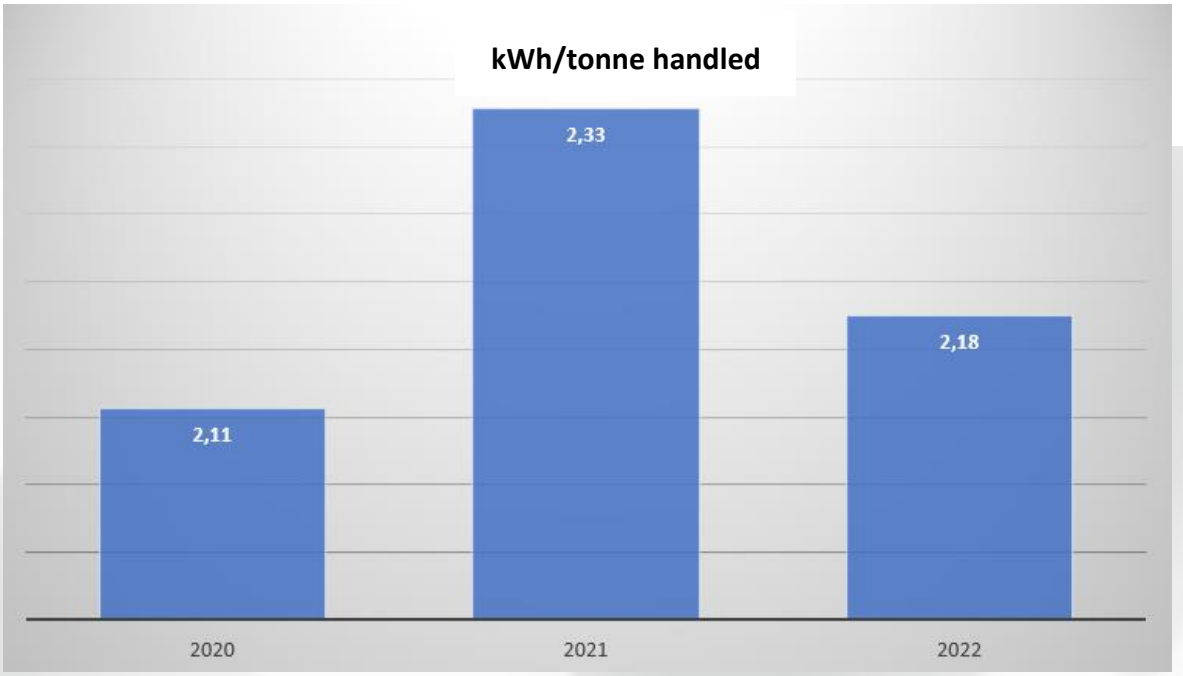
(Fuente: Xataka)

3.1.2.4 Total Energy Consumption

(Fuente: Totalenergía)

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, 2021 and 2022:

	2020	**2021**	**2022**
Total energy (kWh)	2,285,420.16	2,997,431.35	2,809,613.76
Activity (ton. handled)	1,085,049	1,287,699	1,291,656
kWh/ton handled	2.11	2.33	2.18



In conclusion, total energy consumption has decreased as a result of the application of Best Practices and the implementation of other infrastructure improvement initiatives. In the case of the rolling stock, the acquisition of new, more efficient machinery, as well as the monitoring of machine use by port personnel and an increase in mechanical maintenance, have resulted in a decrease in diesel consumption.

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:

	2020	2021	2022
Cleaning sludge (kg)	4,180	5,720	4,580
Residual oil (kg)	3,344	1,507	5,980
Contaminated filters (kg)	610	1,080	1,120

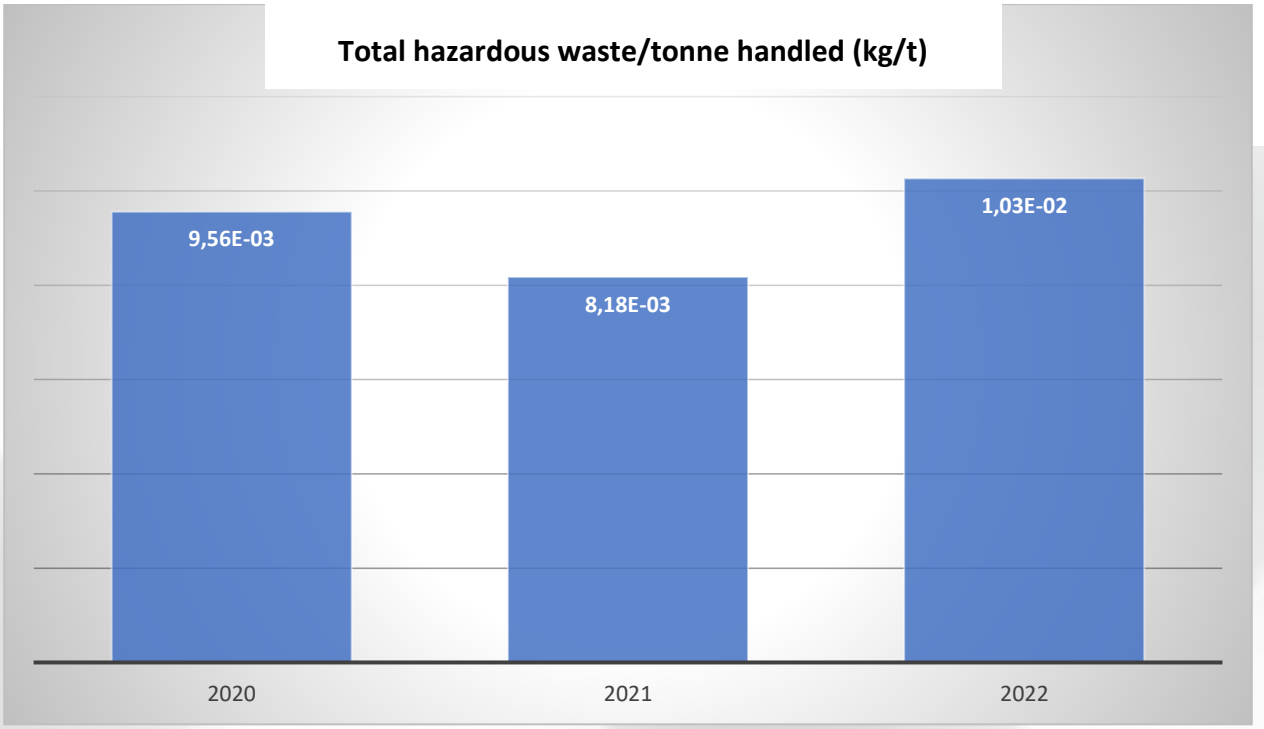
The hazardous waste generated in the last few years is shown in the following table:

	2020	2021	2022
Total hazardous waste (kg)	10,374	10,527	13,258

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

	2020	2021	2022
Ton handled (tonnes)	1,085,049	1,287,699	1,291,656

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



The increase in bulk traffic requires more maintenance of the machinery, which means an increase in the generation of hazardous waste: filters, oil, etc.

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:

	2020	2021	2022
Scrap (kg)	21,480	53,440	48,080
Wood (kg)	355,800	469,120	740,530
Sweeping Debris (kg)	108,190	195,680	188,080

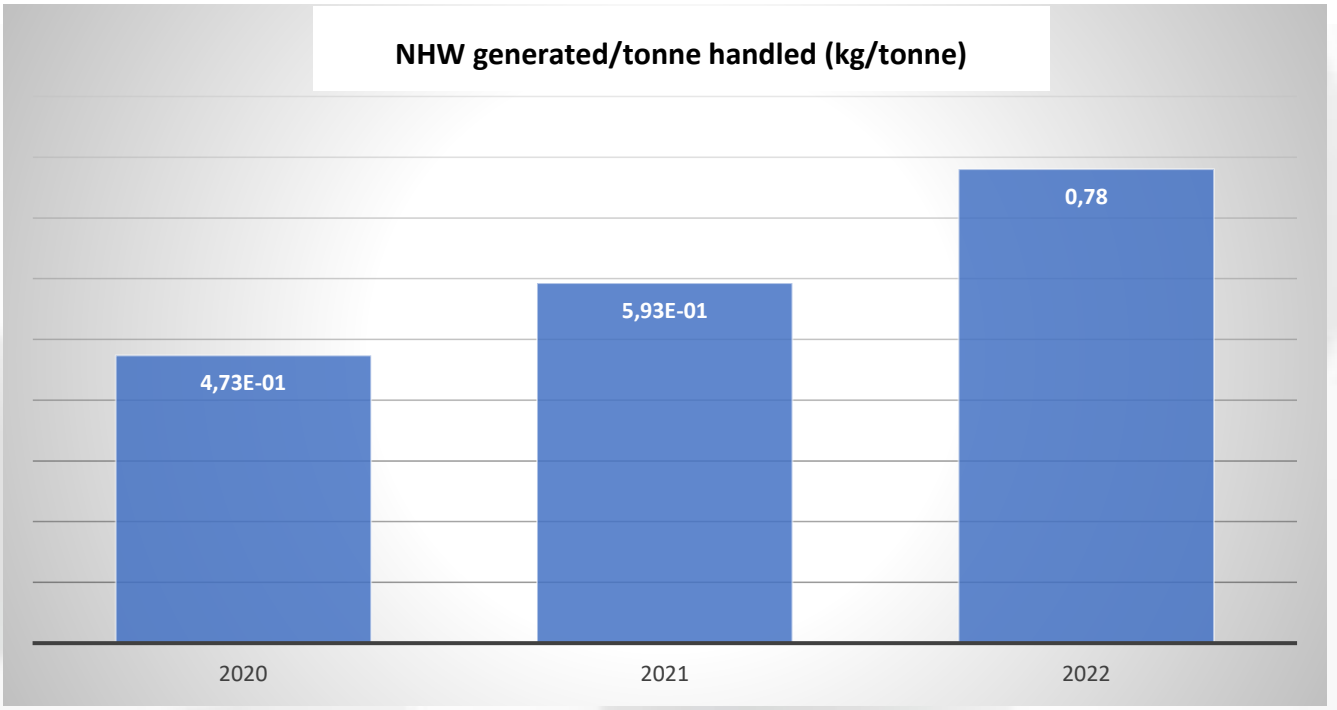
The non-hazardous waste generated in the last few years is shown in the following table:

	2020	2021	2022
Total non-hazardous waste (kg)	513,760.00	763,360.00	1,008,085.00

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

	2020	2021	2022
Ton handled (tonnes)	1,085,049	1,287,699	1,291,656

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



The increase in the generation of non-hazardous waste is due to causes external to ESTIBADORA ALGEPOSA: the growth of steel traffic has led to a greater generation of wood packaging or the traffic of shafts, which generates wood waste from the handling activity.

In 2023, the company is working on an initiative to minimize the amount of wood from the customer's goods (indirect environmental aspect), consisting of the return of its packaging after unloading the ship.

3.1.4 Water consumption

(Fuente: Mancomunidad de la Comarca de Pamplona)

The consumption of water comes from:

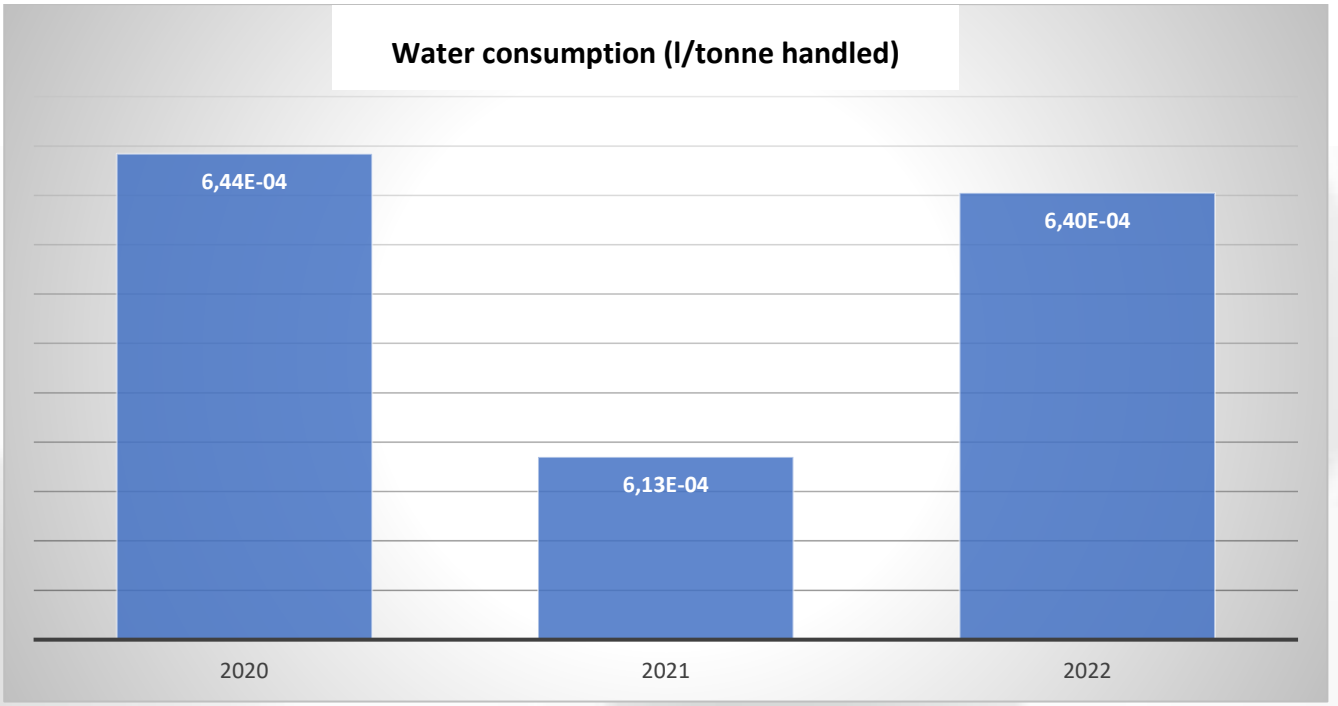
- Sanitary use in changing rooms
- Machinery cleaning

The consumption of water in recent years has been:

	2020	2021	2022
Water consumption (m^3)	699	790	827

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

	2020	2021	2022
Ton handled (tonnes)	1,085,049	1,287,699	1,291,656



The traffic of bulk foodstuffs increases the cleaning needs of the machinery and tools used in the handling of this type of goods, with water being the cleaning element used.

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 periodically analysed. It is discharged into the Pasaia Port sewage system, always maintaining the parameters below the limits established by *Aguas de Añarbe*.

The analytics done by an independent laboratory in June 2020 reflected the following results:

Physical/chemical characteristic	Añarbe limits	Result
pH	5.5-9.5	7.7
Suspended solids	600 mg/l	36 mg/l
COD	1,800 mgO_2/l	39 mgO_2/l
Oil and grease	100 mg/l	<5 mg/l

Ammoniacal nitrogen	40 mg/l	0.6 mg/l
Iron	25 mg/l	0.027 mg/l

There were no changes in maintenance shop activity or in the characterisation of the goods handled by ESTIBADORA ALGEPOSA, S.A. in 2022.

ESTIBADORA ALGEPOSA, S.A., within its Environmental Calendar, has defined a measurement program for monitoring the discharge values. In 2023, it will measure discharges from its maintenance shop. Analyses are planned on a regular basis, or if there is a change in the conditions of the Activity.

3.1.6 Air Emissions

(Fuente: Pikist)

ESTIBADORA ALGEPOSA air emissions come from:

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

No *CH4, N2O, HFCs, PFCs, NF3 or SF6* is emitted. There was a leak in the cooling equipment of a self-propelled crane in 2021, with a recharge of 1.46 kg of *R410A*.

3.1.6.1 Greenhouse Gas Air Emissions

Greenhouse gas air emissions come from:

- Energy consumption

  The use of vehicles, machinery and electricity

- Cooling gas recharges

The Global Warming Potentials indicated in the IPCC Fourth Assessment Report (Regulation 517/2014) were taken into account for fluorinated gas.

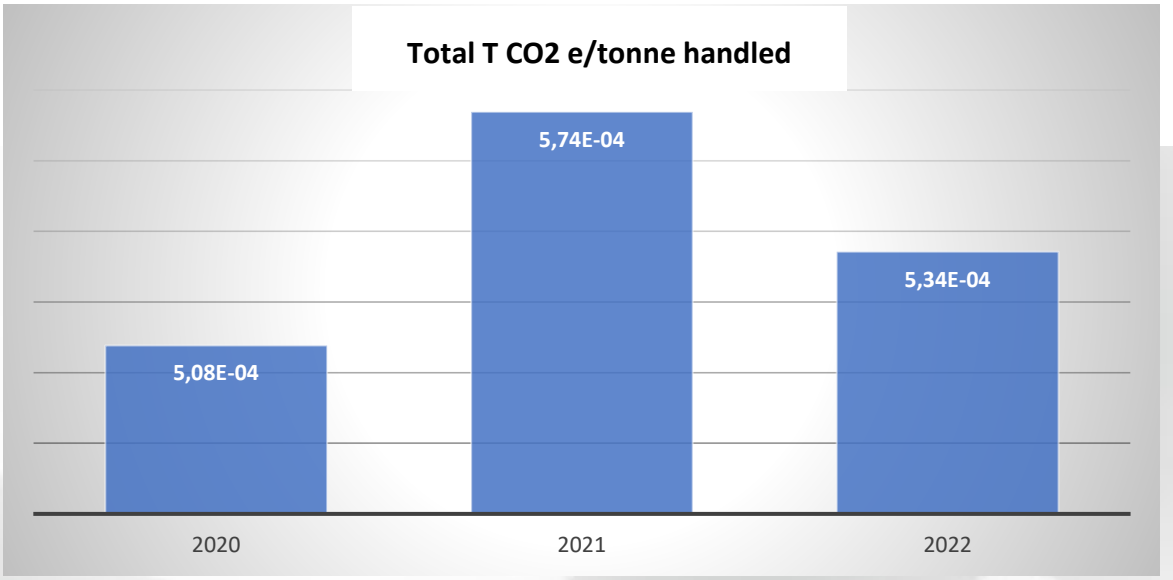
The following table shows the total greenhouse gas emissions for the last three years:

	2020	**2021**	**2022**
T CO2 e	550.8438	738.8880	689.9824

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

	2020	**2021**	**2022**
Ton handled (tonnes)	1,085,049	1,287,699	1,291,656

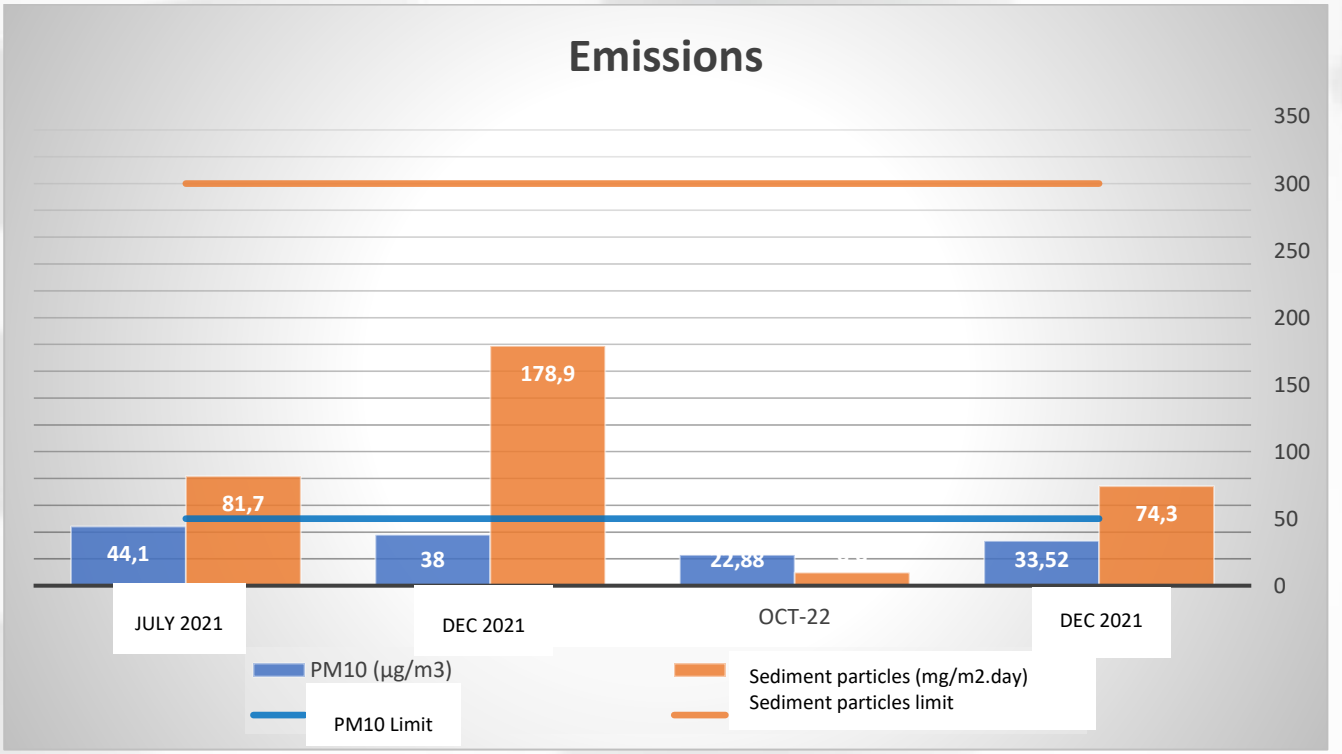
The greenhouse gas emissions based on tonnes handled are shown in the following graph:



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 two 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.

ESTIBADORA ALGEPOSA, S.A. has equipment to prevent the generation of dust, for example: a nebuliser, a wet sweeper or port implements with particle capturing irrigation systems, all as part of the Best Operational Practices defined for the company.

3.1.7 Noise

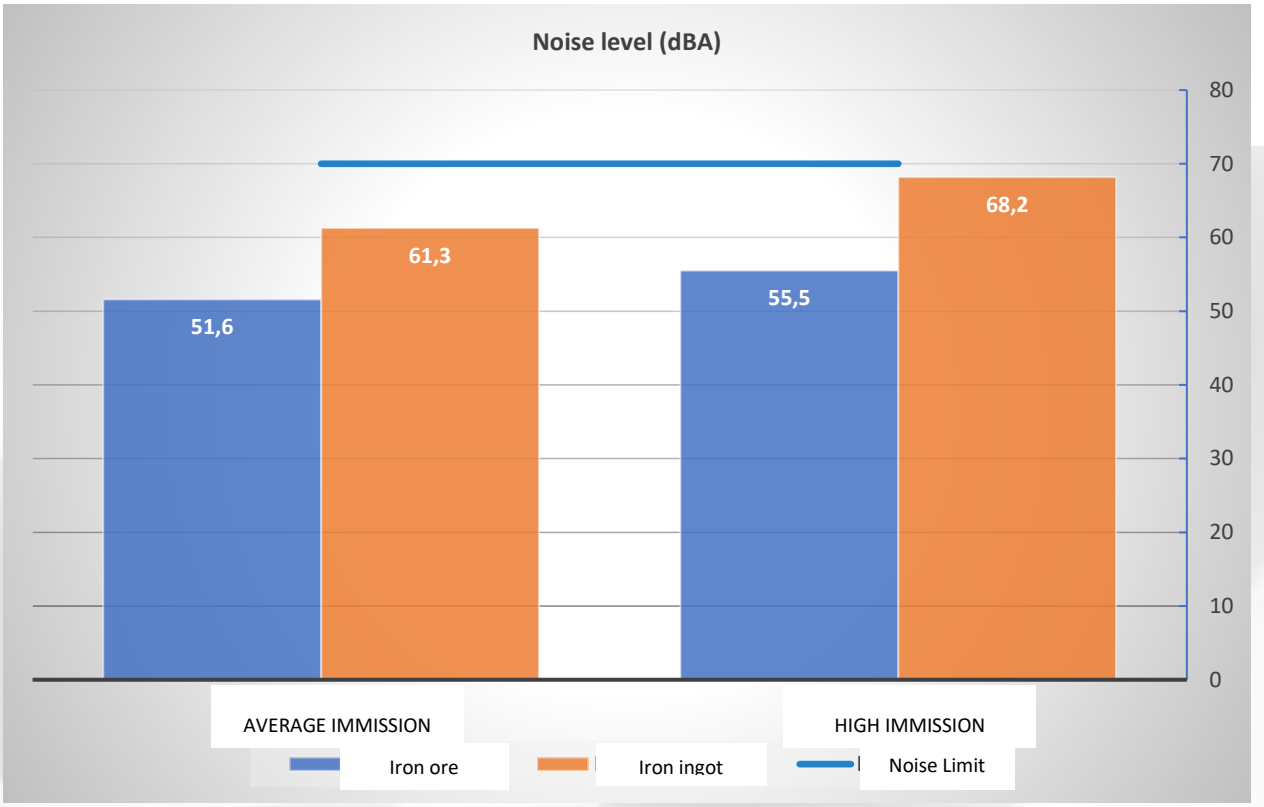
(Fuente: Salud.Mapfre)

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 2022, two noise measurements were taken at two different unloading operations considered to have the greatest acoustic impact on the environment: unloading of iron ingots and unloading of ferrous ore. The two discharges were carried out at the Buenavista dock, taking the measurements in the urban area of Pasai Donibane. 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 2021	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

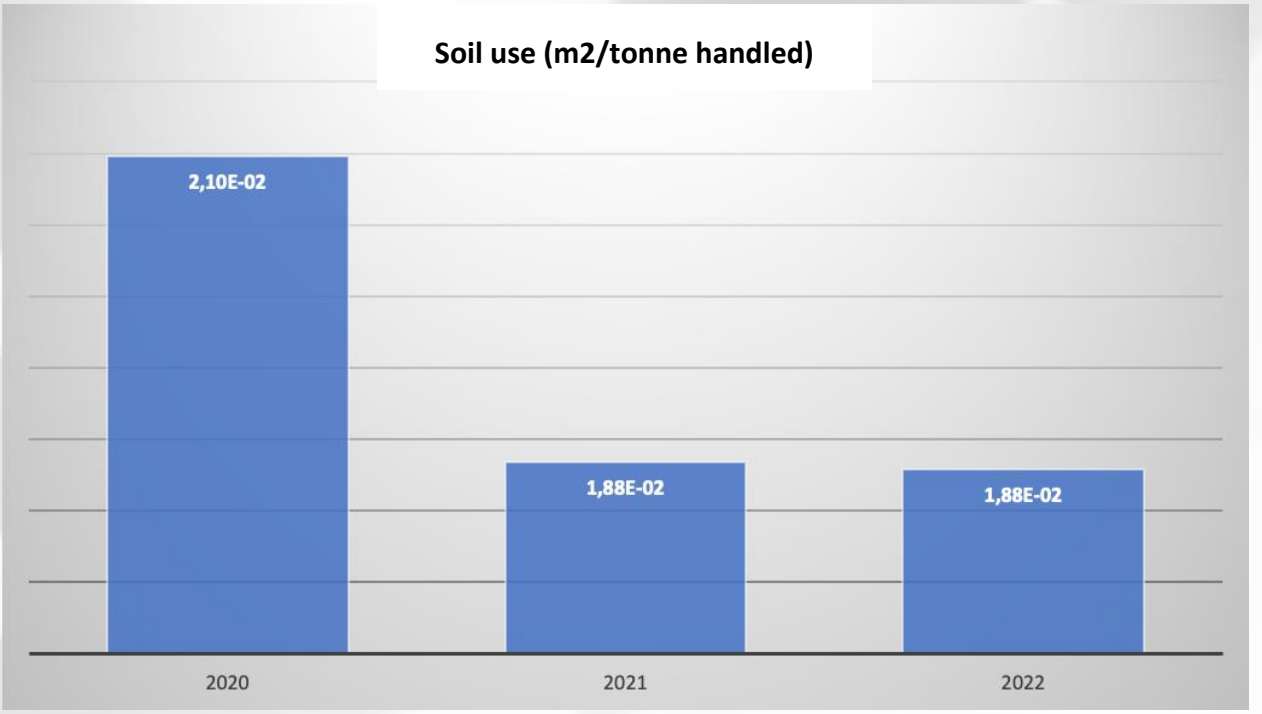
Warehouses 1 and 2 were not included in 2019 as they were added in 2020. Warehouses 4 and 5 were unified in 2021, with warehouse 4 increasing from 6,300 m^2 to 10,500 m^2, and warehouse 5 disappearing.

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

Soil use in relation to biodiversity	2020	2021	2022
Total soil use (m^2)	22,760	24,265	24,265
Total sealed surface area (m^2)	22,760	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:

	2020	2021	2022
Ton handled (tonnes)	1,085,049	1,287,699	1,291,655



4 Degree of Compliance with Environmental Law

(Fuente: Atmosanalytic)

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:

	Laws and Other Requirements
Activity	• Concession Warehouse 1: 19/04/2022 • Concession Warehouse 2: 19/04/2022 • Concession Warehouse 4: 12/02/2004 / Concession Change: 30/07/2020

	Laws and Other Requirements
	• Concession Warehouse 6 bis: 30/12/2010 • Concession Warehouses 8, 9, 10: 22/09/2010 • Machinery shop: 01/04/2018 • Hazardous waste producer authorisation: EU3/5483/2013 • Port Operations Technical Instruction • Self-Protection Plan (rev. 9 April 2020)
Firefighting systems	Spanish Royal Decree 513/2017, of 22 May, which approves the Firefighting System Regulation. (Official Spanish Gazette no. 139, 12/6/17)
Diesel fuel tanks	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 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 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) Decree 29/2015, of 17 March, on the commencement of industrial activities and the Industrial Register 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
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	LAW 4/2015, of 25 June, on the prevention and correction of soil pollution (Official Basque Country Gazette no. 123, 2/7/2015) DECREE 209/2019, of 26 December, implementing Law 4/2015, of 25 June, on the prevention and correction of soil pollution Law 7/2022 of 8 April, on waste and contaminated soils for a circular economy (Official Spanish Gazette No. 85, 9/4/2022)
Noise	Spanish Royal Decree 212/2002, of 22 February, regulating sound emissions in the environment due to certain machines used outdoors 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
Air emissions	Spanish Royal Decree 102/2011, of 28 January, on improving air quality Decree 278/2011, of 27 December, regulating facilities where activities are undertaken which may be air polluting

	Laws and Other Requirements
Discharge	*Aguas del Añarbe* Sewage and Discharge Regulation (Official Basque Country Gazette no. 100, 29/05/2006)
Hazardous waste	Law 22/2011, of 28 July, on waste and polluted soil Spanish Royal Decree 553/2020, of 2 June, regulating the transfer of waste inside the Spanish territory
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
Packaging and packaging waste	Spanish Royal Decree 1055/2022, of 27 December, on packaging and packaging waste
EMAS	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) (UE Official Gazette of 28/08/2017) COMMISION 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) 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

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.

Seven environmental communications were received from the Port Authority in 2022. The communications received were related to particles emissions and the generation of dirt on the slope. A response was given to the Port Authority with regard to these dust emissions and generation of dirt due to the process of handling potentially dusty materials. Best practices for handling dusty materials and improving dock cleanliness conditions are being established.

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.

No accident with environmental repercussions has occurred in the last three years except for the recharging of GHG fluorinated gas in 2021 and 2022. The company has not been fined for this reason.

5.2 Personnel Participation

ESTIBADORA ALGEPOSA, S.A. has implemented an internal blog 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 contribute on environmental or other topics, all pursuant to the procedure E2 50 COMMUNICATION.

The company's management holds periodic meetings with department managers to discuss environmental and other issues.

ALGEPOSA also participates in social events promoted in the environment, creating bridges and improving relations with the Pasaitarra Bay, as is the case of the *Pasaia Itsas Festibala*, held in 2020 and 2022, with the collaboration and sponsorship of ALGEPOSA.

5.3 Environmental Improvement Actions

The following actions were taken in 2022 for environmental improvement:

- Awareness-raising actions among ALGEPOSA personnel on good environmental practices to reduce the environmental impact of the activity
- Inclusion of LED luminaires in warehouse 9
- Electrical energy contracted with a *Guaranteed Source Certificate*

In 2023 the expected environmental improvements are:

- The acquisition of a new scoop: to prevent the leak of dusty material that causes discomfort in the port area due to dust emissions
- The switch to a LED system in warehouses 8 and 10: for the purpose of reducing energy consumption, improving environmental conditions for work

- Study of needs for the introduction or improvement of Best Available Techniques, aimed at greater control of emissions into the environment, in operations likely to cause impact
- With the design 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

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

5.4 Date of the Next Environmental Statement

The 2022 environmental statement (January-December) rev. 1 was verified by LRQA ESPAÑA, S.LU which holds accredited verifying body no. ES-V-0015, by verifier Cristina Domínguez.

The next Statement for year 2023 will be submitted for validation in the first quarter of 2024.

ENVIRONMENTAL VERIFIER'S DECLARATION ON VERIFICATION AND VALIDATION ACTIVITIES

LRQA España, S.L.U, with EMAS environmental verifier registration number EMAS ES-V-0015, accredited for the scope "***Stevedoring and handling services. Road transport management. Railway transport management. Storage, warehousing and logistic services".*** (NACE Code ***52.24***) declares to have verified whether the site(s)

Estibadora Algeposa S.A.
Edificio Consignatarios Planta Baja
20110 Pasajes (Gipuzkoa)
España

as indicated in the Environmental Statement *2022 rev.02*, data *01 January to December 2022*, of the organization with registration number **ES-EU-000133,** meet all requirements of 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), the COMMISSION REGULATION (EU) 2017/1505 of 28 August 2017 amending Annexes I, II and III to Regulation (EC) No 1221/2009 and the 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)

By signing this declaration, I declare that:

- the verification and validation have been carried out in full compliance with the requirements of Regulation (EC) No 1221/2009, 1505/2017 and 2026/2018
- the outcome of the verification and validation confirms that there is no evidence of non-compliance with applicable legal requirements relating to the environment,
- the data and information of the Environmental Statement *2022 rev.02* of the organisation reflect a reliable, credible and correct image of all the organisation/sites activities within the scope mentioned in the environmental statement.

This document is not equivalent to EMAS registration. EMAS registration can only be granted by a Competent Body under Regulation (EC) No 1221/2009 and 1501/2017. This document shall not be used as a stand-alone piece of public communication.

Initial verification Date	05/05/2022
Current Verification	05/05/2022
Expiration of Verification	04/05/2025
Annual Validation date	21/04/2023
Expiration of Validation	04/05/2024

LRQA Ref nº: SGI00000319

Issued by LRQA España, S.L.U. on 21/04/2023

18023690Q
OLGA RIVAS
(R: B86612140)

Digitally signed by
18023690Q OLGA RIVAS
(R: B86612140)
Date: 2023.11.22
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Signed by OLGA RIVAS
On behalf of LRQA España, S.L.U.
C/ Las Mercedes, 31-2º Edif Abra 3. 48930 Las Arenas (Getxo) Vizcaya
ENAC, Nº. ES-V-0015