

SUSTAINABILITY REPORT

EINF 2024

**Grow
with
purpose.**



contents



About
this Report

3

01

Our
Commitments
to Sustainability

5

02

Aspects Y2024
Sustainability
Management
Highlights

7

03

Our Sustainability
Commitments

10

04

Disclosures
ESRS 2 general
information Basis
for preparation

12

05

Governance
of the
Sustainability

14

06

Our Strategy
and Business
Model

24

07

Our
Stakeholders

29

08

Materiality -
Assessment
Process

34

09

Environmental
Reporting
ESRS E1 & E2

42

10

Social Reporting
ESRS S1, S2 Y S3

62

11

Business
Conduct ESRS G1

97

12

Financial
Reporting

107

About this Report

TRUCK AND WHEEL GROUP S.L. and its subsidiaries (hereinafter referred to as **TWG**) present their **Sustainability Report** (EINF) with the aim of informing their Stakeholders about their performance in this area, in accordance with their commitment to transparency.

This report is also prepared in compliance with Law 11/2018 of December 28, which amends the Commercial Code, the revised text of the Capital Companies Act approved by Royal Legislative Decree 1/2010 of July 2, and Law 22/2015 of July 20, on Auditing of Accounts, regarding non-financial information and diversity.

The report includes information regarding **TWG**, the parent company of a group of subsidiaries consolidated in the logistics sector through its division TRUCK & WHEEL LOGISTICS S.L. (**TWL**), and in the automotive components sector through its division TRUCK & WHEEL AUTOMOTIVE S.L. (**TWA**). The document "Consolidated Annual Accounts – Consolidated Management Report" for the fiscal year ending December 31, 2024, provides details of the companies in which **TWG** holds direct or indirect stakes. Notably, **TWG** owns 83.99% of Setland S.L. and acquired 100% of Toldos Araba S.L. in October. Both companies are fully consolidated, and the annual accounts reflect this operation. Therefore, both environmental and social indicators are included for them.

This is **TWG**'s fourth report corresponding to the calendar year and fiscal year from 01/01/2024 to 12/31/2024, and it details its progress in non-financial (environmental, social, and governance) aspects.

For 2024, the report has been restructured to include a sustainability statement in preparation for compliance with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). A full description of the basis for the sustainability statement preparation is provided on page 8.

To also meet the requirements of Law 11/2018, the framework of the Global Reporting Initiative (GRI) standards has been considered, focusing attention and reporting on identified material topics.

This report has been prepared by the Sustainability Director based on information provided by the Sustainability Committee (CSOS), composed of key area representatives of the company, and the Board of Directors approved its contents, affirming the importance of clear and transparent accountability. It has also undergone external verification.

It has been published on our website at www.tw-group.com/sostenibilidad. For any inquiries or additional information, please contact:

sustainability@tw-group.com

Letter from the President

Dear Reader,

The progress achieved in 2024 reaffirms our belief that sustainability is a strategic driver for **TWG**. Our commitment to excellence has enabled us to expand, optimize processes, strengthen our structure, and **consolidate a sustainable and responsible growth model**.

This year, we have continued to professionalize our systems and teams, aware that sustained growth requires the active collaboration of our stakeholders. Decarbonization is one of the major challenges in our industry, and at **TWG** we are fully committed to this transition. That is why we are working hand-in-hand with our supply chain and customers to reduce our carbon footprint and promote innovation in our operations. We have **begun measuring our Scope 3 emissions to design an effective decarbonization plan**.

Our investments continue to focus on improving the customer experience through technology, digitalization, and operational excellence. Innovation and quality are fundamental pillars of our strategy, allowing us to develop more efficient, agile, and personalized services.

Regarding environmental impact and people development, **we have increased training for our team by 26.07% and implemented an e-learning platform to ensure continuous learning and upskilling in an increasingly innovative environment.** We also continue to foster a safe, inclusive, and diverse work environment, reinforcing our compliance

and business ethics policies. In this regard, we have revised and updated our Code of Ethics and Data Protection Policy, and implemented new policies such as the Sustainable Purchasing Policy, the Inclusion, Diversity and Equality Policy, and the Anti-Harassment Protocol.

Our foundation has been a key pillar in our social impact strategy. This year, we supported the development of a platform to help SMEs create their sustainability reports and promote visibility and dynamism in social projects: Espacio 30. We also launched the first storybook in the Indomables collection, aimed at inspiring critical thinking and creativity in new generations. Additionally, we made progress in the production of a film about Queen Toda.

Aware of the regulatory changes in sustainability, we have restructured our Sustainability Report to align with the CSRD and the ESRS, incorporating a double materiality assessment that enables us to identify impacts, risks, and opportunities with greater precision.

As technology continues to transform our sector, **TWG** is doubling down on innovation and digitalization to strengthen our infrastructure and enhance the customer experience. Our focus on excellence allows us to continue **growing with purpose, ensuring a positive impact on society and a service offering that combines efficiency, transparency, and agility.**

Thank you to everyone who is part of **TWG**: employees, clients, partners, and suppliers. Your commitment and trust drive us to continue moving forward with determination toward a high-performance, sustainable future.

Sincerely,

Carlos Llonis
Presidente TW Group



36%

73%

58%

01

Our Sustainability Commitments



About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

1 Our Commitments to Sustainability

During the year 2023, our purpose was to **EVOLVE**, i.e. to **improve our processes** to optimize our social and environmental impacts, guaranteeing at all times the quality of our services and the security of our data and assets for the sustainable **CREATION OF VALUE**.

This evolution served as the starting point for setting our new objectives for 2024. It allowed us to focus on a new strategy: **GROWING WITH PURPOSE**. This strategy involves expanding and developing our operations by aligning our core values with our mission. It's not just about increasing profits or business size, but doing so in a way that has a positive impact on society, our employees, and the environment. This positive impact is our purpose.

Here are some key aspects we consider essential to ensure we are growing with purpose:

1. Sustainability: Implement practices that minimize environmental impact and promote long-term sustainability. Encourage sustainable innovation by developing more sustainable implementing.

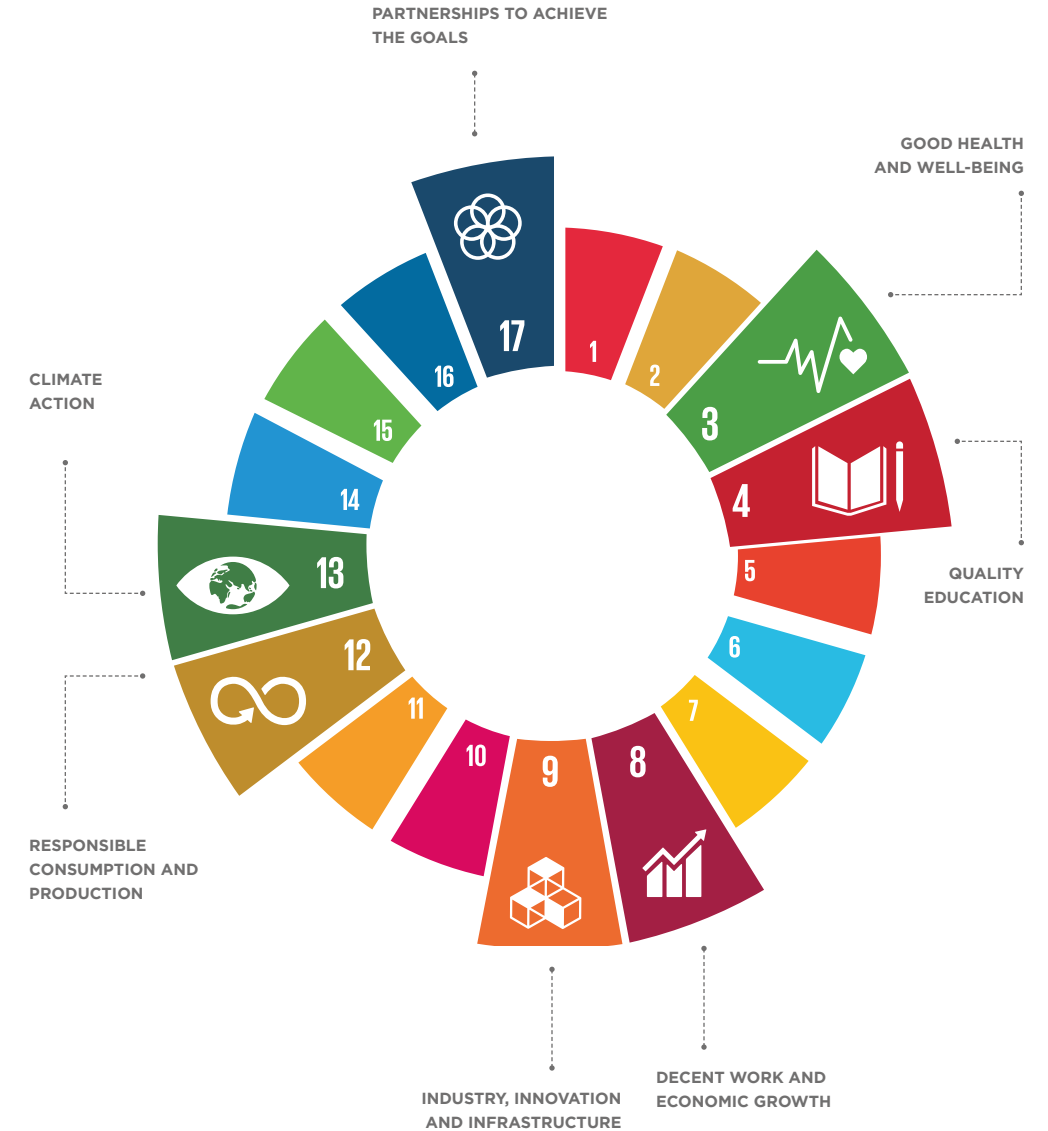
2. Social responsibility: Contribute to the well-being of the community by creating quality employment and contributing social causes through innovative initiatives.

3. Business ethics: Maintaining high ethical standards in all operations and decisions and communicating them reliably to our stakeholders.

4. Innovation: Developing products and services that are not only profitable, but also improve people's lives.

5. Organizational culture: Foster a positive work environment and support the personal and professional fostering of employees through training, wellness and recognition programs.

In order to ensure that we are applying our efforts where we can have the greatest impact, we are focusing on the following SDGs:



A grayscale background image showing a hand holding a globe. The globe has a dotted texture and is surrounded by faint, glowing orbital lines. The hand is positioned at the bottom left, with fingers slightly curled.

02

Sustainability Management Highlights Y2024

About this
Report

- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting

2 Sustainability Management Highlights Y2024

REPORTING ESG

ALIGNMENT WITH CSRD AND ESRS

We renewed our **double materiality** assessment and restructured our sustainability report in preparation for compliance with the EU's CSRD and ESRS regulations.

GHG EMISSIONS ACCOUNTING - SCOPE 1, 2 & 3
MEASUREMENT OF CARBON FOOTPRINT - SCOPE 3

Having already completed our second measurement of Scope 1 and 2 emissions, we proceeded with the accounting of **Scope 3 emissions** according to the GHG Protocol. These include indirect emissions occurring throughout our value chain. This gives us a more complete view of our environmental impact and helps identify critical areas in the supply chain where improvements can reduce greenhouse gas emissions.

DECARBONIZATION OF IN-HOUSE OPERATIONS
USE OF GREEN ENERGY

We now operate with 100% green energy in 9 warehouses across Spain.

REGULATORY COMPLIANCE
UPDATING POLICIES AND PROCEDURES

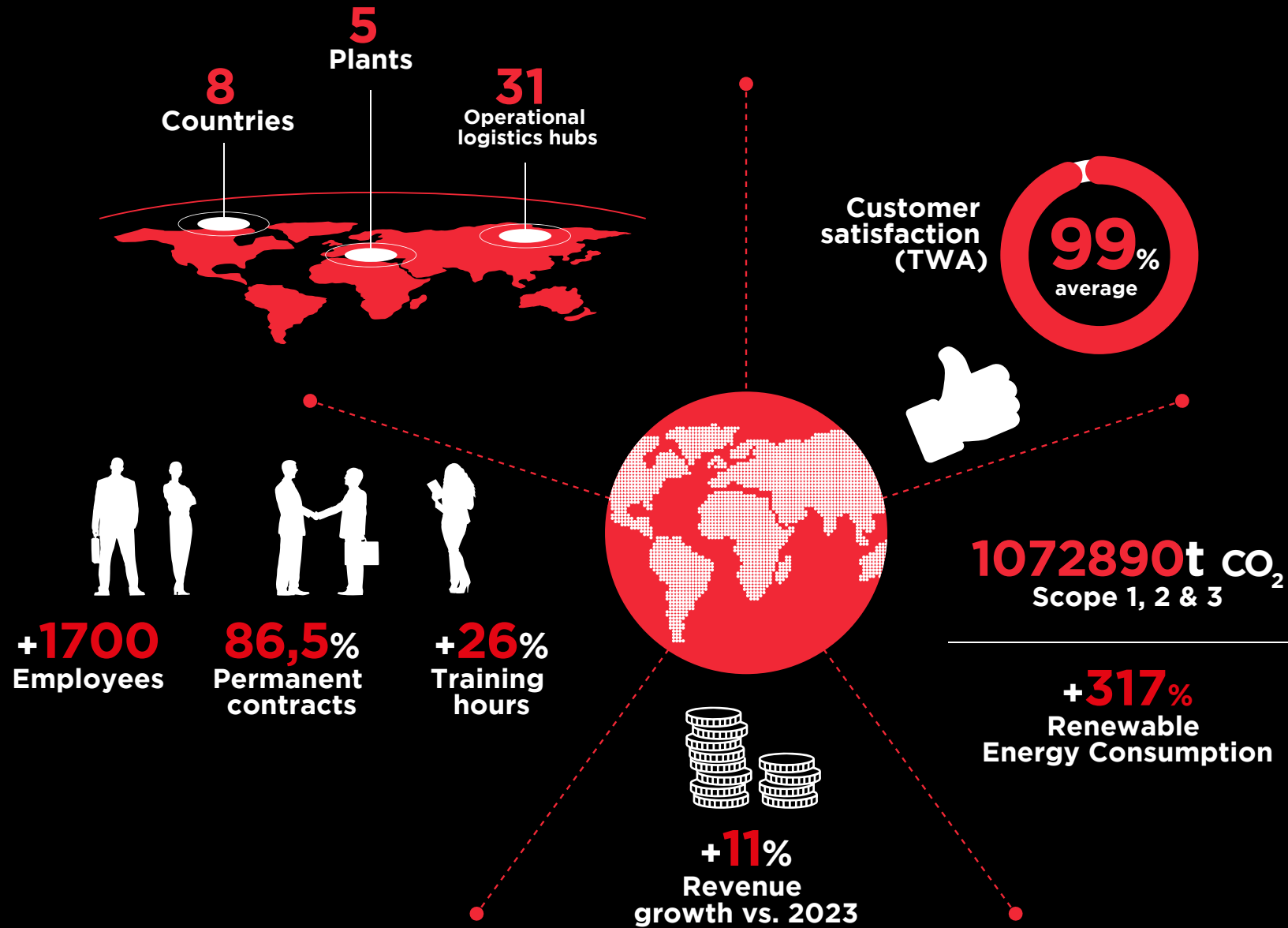
Keeping policies up to date ensures the company remains compliant with current regulations, helps identify and mitigate new risks, and reinforces our commitment to ethics and integrity—promoting a strong culture of compliance among employees. Several key documents were revised and approved by the Sustainability Department, the Compliance Committee (CNN), and the Board of Directors, including: Code of Ethics Supplier Code of Ethics, Anti-Corruption Policy, Sustainable Purchasing Policy, Environment, Quality, and Health & Safety Policy ...among others.

SUSTAINABILITY KPIS SYSTEMATIZATION
NEW SUSTAINABILITY PLATFORM

We renewed our sustainability platform to consolidate ESG quantitative data, allowing us to better measure the impact of our activities.

About this Report

- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting



03

Our **Sustainability** Commitments

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process








09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

SUMMARY OF PROGRESS – Y2024

RESUMEN DE PROGRESO						
ENVIRONMENT		PEOPLE			RESPONSIBLE BUSINESS	
ESG PRIORITY AREAS	E1 D EMISSIONS REDUCTION / ENERGY EFFICIENCY		S1 IN-HOUSE WORKFORCE		G1 BUSINESS CONDUCT	
MATERIAL ESG TOPICS & SDGS	Climate Change Pollution	   	Working Conditions & Labor Rights		Occupational Health Safety	 
KEY AMBITIONS	Decarbonize our logistics solutions through partnerships		Be a diverse, inclusive company that promotes health and safety		Develop an anti-corruption training video and review corporate policies	
2024 KEY OBJECTIVES	Measure Scope 3 carbon footprint per GHG Protocol		Raise women in leadership by 10% and training hours by 10%	Increase inclusion of people with disabilities by 10%	Reduce workplace accidents and illnesses by 10%	Achieve zero complaints related to bribery, fraud, harassment, discrimination, or violations of the Code of Ethics
	Launch a new data capture system for emissions accounting		Increase training by 10%		Sign the Luxembourg Declaration	Renew Information Security and Data Protection policies
	Increase waste recovery by 20					
	Increase renewable energy consumption by 50%					
LONG-TERM OBJECTIVES	Create a 5-year decarbonization plan aligned with SBTi		Reduce employee turnover by 10% annually until 2027		Achieve zero serious injuries or deaths within the next 2 years	Obtain ISO 27001 certification (2025) Train 100% of staff on the Code of Ethics and related policies (Anti-Corruption, Human Rights, Inclusion & Diversity, Cybersecurity, Data Protection) Evaluate sustainability in the supply chain
PROGRESS IN 2024	317% increase in renewable energy consumption	New emissions data capture system	New Human Rights and Anti-Harassment policies	25.74% women in management (vs. 23% in 2023)	Signed Luxembourg "Healthy Company" Declaration	Created SGI Committee, updated Data Protection Policy
	+170.46% increase in waste recovery		+42.86% increase in inclusion of people with disabilities		+16% increase in health and safety training hours vs. 2023	Published Anti-Corruption training video
	Renewed Environment, Quality and Health & Safety Policy	-21.56% reduction in water consumption ratio	+26% increase in overall training hours	Improved recruitment and exit interview processes	Continued rollout of ISO 45001 certification	0 complaints received via the ethics channel
2025 GOALS	Scope 1: 10% reduction in fuel consumption (own vehicles)		+10% increase in: Women in leadership	+10% increase in: Inclusion of people with disabilities	Reduce workplace injuries and illnesses by 10%	Sin reclamaciones sobre casos de soborno y corrupción/fraude/reclamaciones sobre acoso y discriminación o cualquier otra violación al Código Ético y Código Ético de Proveedores
	Scope 2: Renewable energy purchase for German plant					Certificacation ISO 27001
	Scope 3: +10% use of renewable raw materials, -10% in waste, -15% in business travel, HVO fuel in 15% of logistics fleet		+10% increase in: Training hours	Roll out "Healthy Company" initiative to 2 warehouses	+20% in environment and sustainability training	+25% in compliance training

04

ESRS 2 General Disclosures

4 ESRS 2 General Disclosures

BASES FOR PREPARATION

↘ ESRS 2 BP-1

General Basis for Preparing the Sustainability Statement

This Sustainability Report has been prepared with the intention of positioning ourselves for compliance with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). The statement covers our own operations and both upstream and downstream value chains.

We welcome the new standards and believe they will strengthen sustainability efforts to ensure greater transparency, balanced and consistent data reporting, and increased accountability. Even though the Directive is not yet mandatory for reporting purposes—awaiting transposition in Spain, where our headquarters are located—we have decided to implement most requirements in this year's report. It is also our intention to comply with Law 11/2018 as required, which has demanded significant effort and involvement from the Sustainability area, **making us the first company in the sector to undertake this complex exercise and once again demonstrating our management capacity and distinctive approach in Sustainability.** At the end of this Report, you will find a content table with the corresponding application of the relevant regulations.

Sustainability is fully integrated into our business, including strategy development, commercial activities, reporting, risk management, and our policies. Therefore, we believe we are at a maturity level where almost full prior implementation of the Directive and ESRS is possible, making us an example for other companies.

↘ ESRS 2 BP-2

Disclosures Relating to Specific Circumstances

The statement includes our **double materiality assessment** (DMA). The DMA process described in IRO-1 includes impacts, risks, and opportunities that cover our own operations and those of our value chain. Compliance policies extend to our value chain and are described in the relevant sections.

The **TWG** Sustainability Report for the 2024 annual period was prepared with reference to GRI and in accordance with Law 11/2018, as mentioned on sheet 3, and is considered for comparative purposes in this Report.

Greenhouse Gas (GHG) accounting has been updated and expanded in terms of reporting both its corporate scope (including **TWG** affiliates) and the inclusion of Scope 3, which contributed to its recalculation.



05

Sustainability Governance

CO₂

5 Sustainability Governance

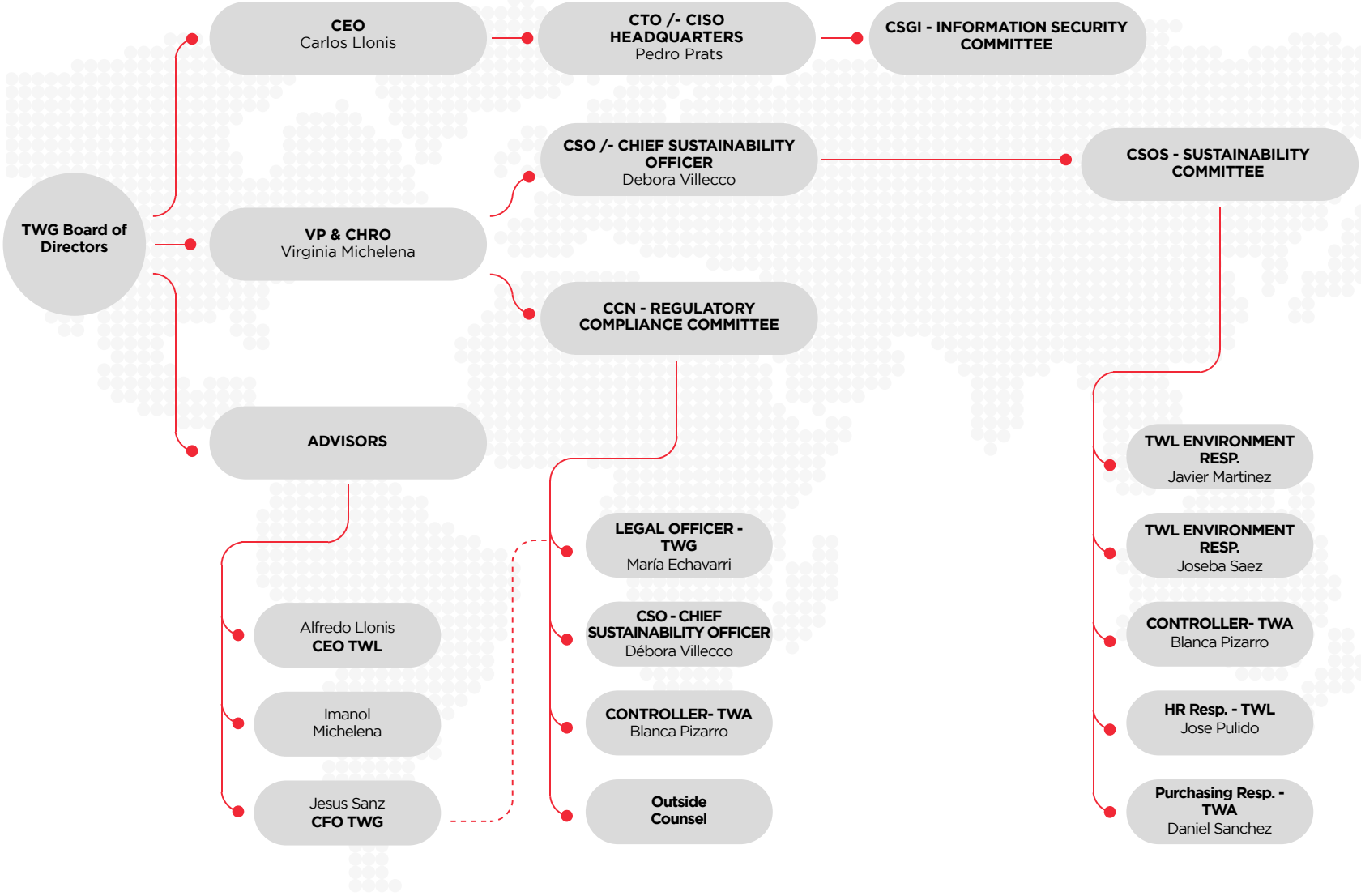
📌 ESRS 2 GOV-1

Role of the Administrative, Management, and Supervisory Bodies

Effective Sustainability governance ensures decisions are based on accurate and relevant information, promoting transparency and accountability. The governing bodies that, in addition to overseeing and ensuring the implementation of **Sustainability** at **TWG**, are detailed in the following chart and explained in more detail below:

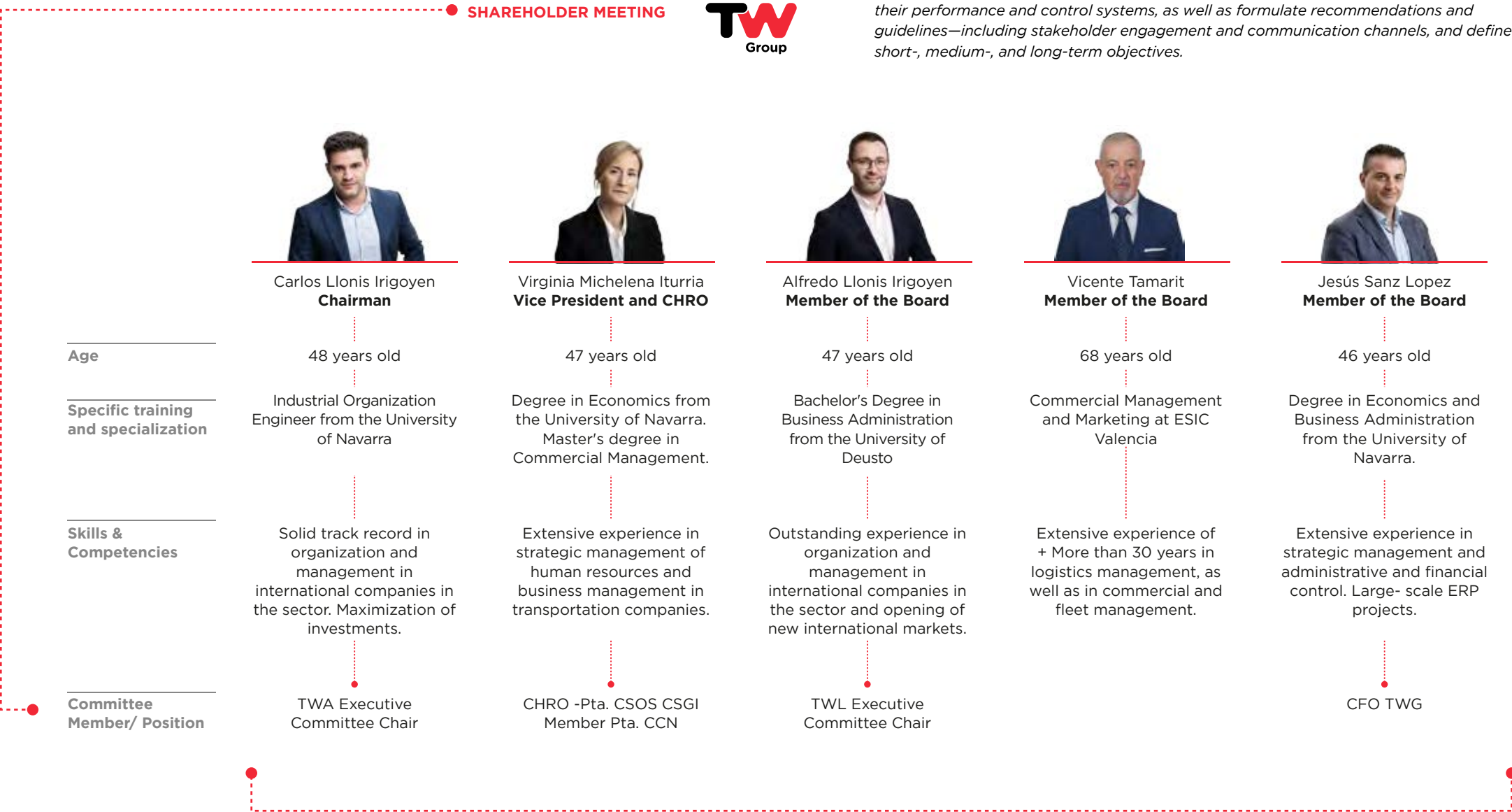


- About this Report
- 01. Our Commitments to Sustainability
 - 02. Aspects Y2024 Sustainability Management Highlights
 - 03. Our Sustainability Commitments
 - 04. Disclosures ESRS 2 general information Basis for preparation
 - 05. Governance of the Sustainability
 - 06. Our Strategy and Business Model
 - 07. Our Stakeholders
 - 08. Materiality - Assessment Process
 - 09. Environmental Reporting ESRS E1 & E2
 - 10. Social Reporting ESRS S1, S2 Y S3
 - 11. Business Conduct ESRS G1
 - 12. Financial Reporting



The Board of Directors (CA) through the intervention and control of the VP and CHRO delegates in the area of Sustainability the management of these issues. She is the one who transfers the strategy to the area through her involvement in the CSOS and finally approves the initiatives and objectives defined in said Committee, thus guaranteeing the required independence, diversity of thought and technical approach.

- About this Report
- 01. Our Commitments to Sustainability
 - 02. Aspects Y2024 Sustainability Management Highlights
 - 03. Our Sustainability Commitments
 - 04. Disclosures ESRS 2 general information Basis for preparation
 - 05. Governance of the Sustainability
 - 06. Our Strategy and Business Model
 - 07. Our Stakeholders
 - 08. Materiality - Assessment Process
 - 09. Environmental Reporting ESRS E1 & E2
 - 10. Social Reporting ESRS S1, S2 Y S3
 - 11. Business Conduct ESRS G1
 - 12. Financial Reporting



About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

ESRS 2 GOV-2

Information Provided to the Administrative, Management, and Supervisory Bodies and Sustainability Aspects Addressed by Them

Board of Directors

The Board of Directors (BoD) consists of the CEO, the VP, and three directors.

The BoD determines and oversees **TWG**'s commercial strategy, control systems, and overall risk management, including sustainability risks.

The vice president of **TWG** participates in the meetings of the Sustainability Committee (CSOS) and holds regular meetings with the CSO—Chief Sustainability Officer, to monitor and fulfill matters specific to this area, such as the performance of initiatives, measurement of impacts, material risks and opportunities, and shares these with the rest of the BoD members.

The Board of Directors also defines the link with our Stakeholders and the communication channels used, and approves **TWG**'s overall sustainability strategy and the content of the Annual Report. Its members have extensive professional experience and a broad background in finance, engineering, and HR.

There is 20% female participation.

The current competence and training profile of the Board of Directors is included in Section **G1**.

In summary, the BoD delegates the management of its sustainability affairs to the Sustainability area, but maintains control through the intervention of the vice president, who transmits the sustainability strategy to the CSO and the Sustainability Committee (CSOS) and finally approves the initiatives and objectives..

Key Activities for Achieving Objectives and Sustainability by the Board of Directors during the Reporting Period:

- Review of strategy and business plan, including a new expansion model to increase production capacity and create more quality jobs.
- Expansion in the USA: The US market has been a priority with the opening of the first headquarters in Alabama in 2017. Later, the California hub in 2023 marked the expansion of an ambitious plan that continued with the opening of a new base in Houston in 2024.
- Creation of the Information Security Committee to review our cybersecurity policy and the ongoing implementation of the group ERP system according to new needs and requirements.
- Creation of an internal legal area for due review of our risk management, including criminal risks.
- Approval of the review of the corporate criminal risk matrix with assistance from Deloitte.
- Approval of the implementation of an internal AI management platform for visualization and review of Sustainability data.
- Approval of Policies developed by the Sustainability Department (Environment, Quality, and Occupational Health and Safety Policy, Human Rights Policy, Sustainable Procurement Policy, Supplier Code of Ethics, Harassment Protocol), reviewed by the Regulatory Compliance Committee (CNN) and the Board of Directors.
- Approval of the new Sustainability content (update) on the **TWG** website for communication to our Stakeholders.
- Approval of the training content for the Anti-Corruption course.

Sustainability Objectives determined by the Board of Directors for the next period, Year 2025:

- Expansion to a new continent: Australia is positioned as our second major focus for internationalization. With the opening of offices in Sydney and Melbourne, we aim to capitalize on opportunities in the growing regional trade.
- ISO 27001 Certification.
- Strengthening of the Compliance system through monitoring all company risks based on proper systematization.
- Having a decarbonization plan based on SBTi for the next 5 years.

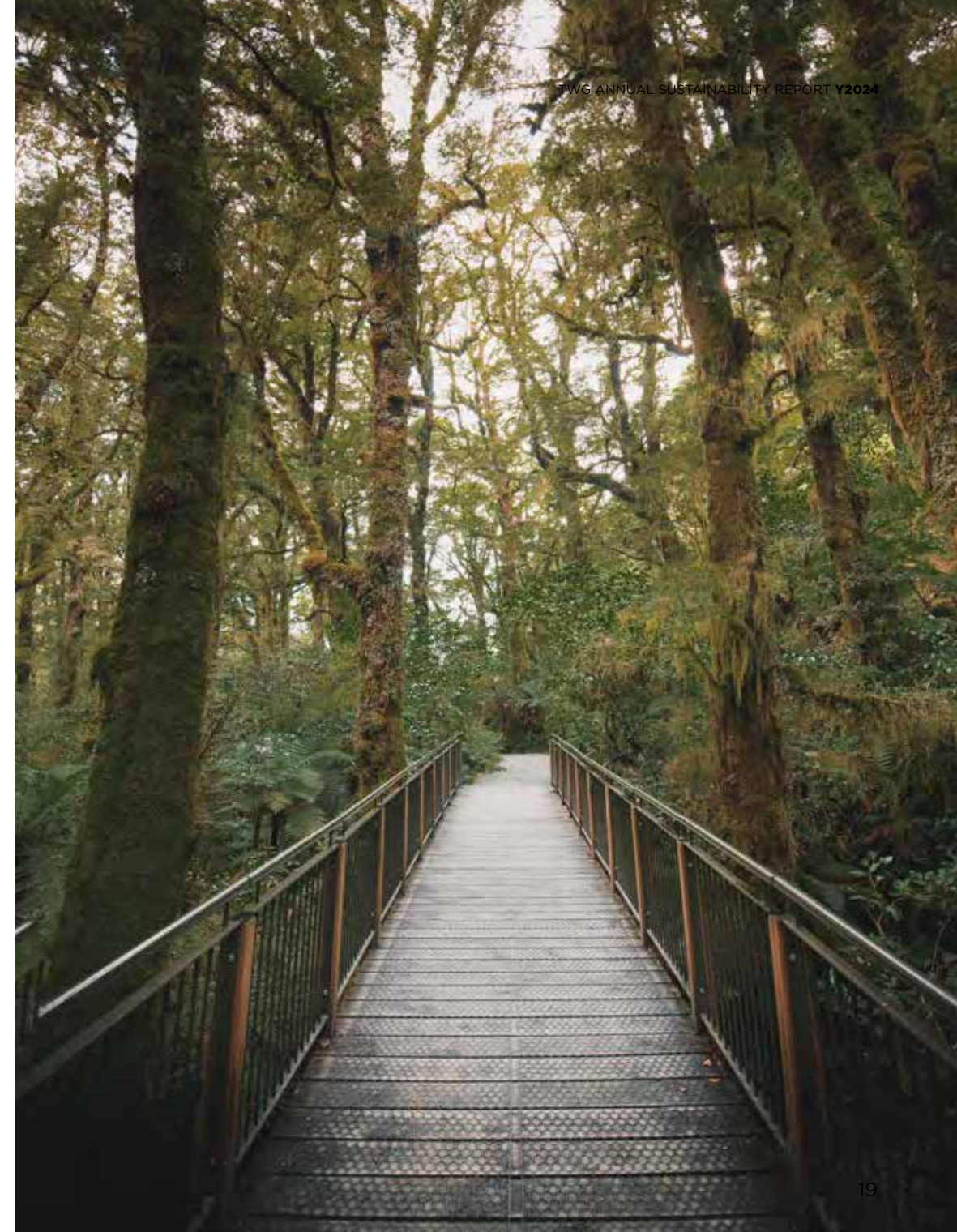
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Chief Sustainability Officer – CSO

Reports to the Vice President of **TWG**.

In line with **TWG**'s new stage, the role of the Chief Sustainability Officer (CSO) ensures that sustainability strategies are aligned with these objectives, integrating sustainability at the core of operations and strategic decisions, helping to generate competitive advantages—which is crucial to differentiate from the competition—ensuring the company complies with all environmental and social regulations—mitigating legal and reputational risks—creating a corporate culture attractive to talent, which is vital for a company like ours in full expansion, thus improving the company's perception among clients, investors, and other stakeholders.

1 CSOS=Sustainability Committee



About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

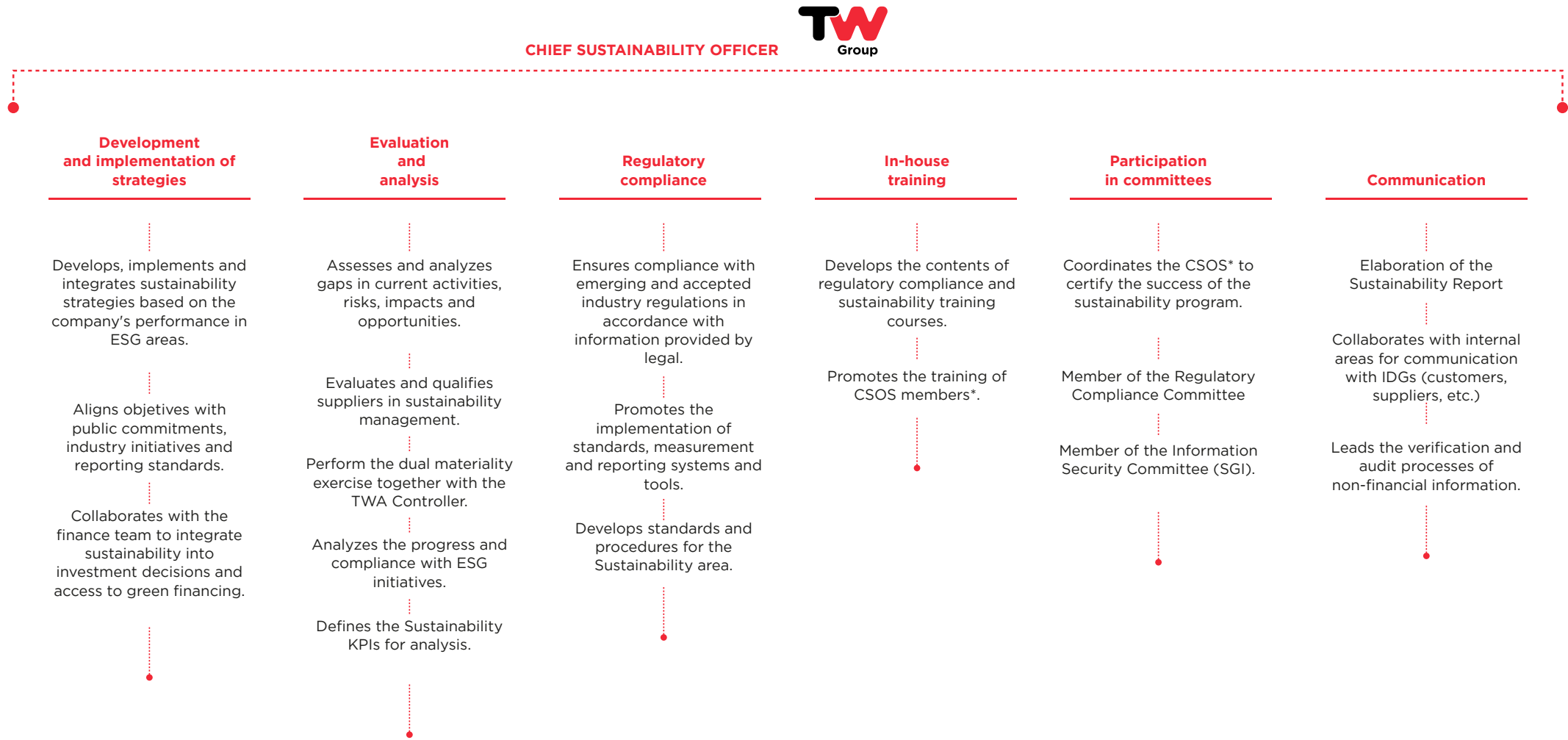
09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Some of their functions are detailed below:



* Sustainability Committee

About this
Report

01.
Our Commitments to
Sustainability

02.
Aspects Y2024
Sustainability
Management
Highlights

03.
Our Sustainability
Commitments

04.
Disclosures ESRS 2
general information
Basis for preparation

05.
Governance
of the Sustainability

06.
Our Strategy and
Business Model

07.
Our
Stakeholders

08.
Materiality -
Assessment Process

09.
Environmental
Reporting
ESRS E1 & E2

10.
Social Reporting
ESRS S1, S2 Y S3

11.
Business Conduct
ESRS G1

12.
Financial Reporting

Sustainability Committee – CSOS

It is made up of a multidisciplinary team (responsible for Environment, Quality, Health and Safety, Procurement, and Finance) whose role is to:

- Support the management and supervision of sustainability in a localized and coordinated manner throughout the company.
- Collect, monitor, and evaluate qualitative and quantitative information from these areas.
- Share the collected information monthly to determine, together with the Chief Sustainability Officer, the best improvement initiatives and annual objectives.
- Once the objectives are agreed upon, the CSOS members are responsible for:
 - Implementing these initiatives.
 - Verifying and ensuring their transparency.
 - Collecting evidence of the Management Indicators (KPIs) gathered.
 - Ensuring the accuracy of these indicators during audits.
- Monitoring and reporting the risks in their respective areas.
- Providing this information to the Chief Sustainability Officer for the preparation of reports and presentations to stakeholders upon request.

Integration of Sustainability into TWG Strategy

Sustainability is a strategic enabler of **TWG’s** growth. The core elements of how we consider impacts, risks, and opportunities are described in each of the main sections of this Sustainability Report. We also take into account material sustainability issues such as health and safety and regulatory compliance, among others, in our due diligence process when undertaking expansions and acquisitions.



“TWG’s Sustainability Committee is a global, multidisciplinary body that deploys actions to meet short- and long-term objectives.”

About this
Report

- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting

HOW SUSTAINABILITY IS INTEGRATED INTO INCENTIVE PLANS

📌 **ESRS 2 GOV-3**
Integration of Sustainability-Related Results in Incentive Plans

TWG includes sustainability-related performance in the incentive plans of CSOS members based on annual progress towards sustainability objectives.

This incentivizes strategic decisions that drive progress towards achieving our goals.

STATEMENT ON DUE DILIGENCE

📌 **ESRS 2 GOV-4**
Statement on Due Dilligence

The table [ESRS 2 SBM-3](#) provides a map of how **TWG** applies the core elements of due diligence for people and the environment and where they are presented in this Sustainability Report.



MANAGEMENT OF SUSTAINABILITY RISKS

📌 ESRS 2 GOV-5

Risk Management and Internal Controls on Sustainability Reporting

Our risk assessment approach follows a systematic risk prioritization methodology, as required by regulations. To minimize errors in report preparation, **TWG** has a Power BI platform where each CSOS member, according to their area, verifies the monthly data input into the platform and identifies and corrects inconsistencies or errors by comparing the evidence with the quantitative information provided. Quantitative data loaded in different ERPs (SAP and SAGE) are also double-checked by Administration and Finance (controllers of TWA and **TWL**). The CTO-CISO of **TWG** oversees software and technological risk controls to ensure optimal performance. Additionally, the external auditor provides limited assurance. For more information, please refer to the Limited Assurance Statement of the Auditor, attached at the end of the Report.



06

Our Strategy and Business Model

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. **Our Strategy and Business Model**

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

GENERAL INFORMATION | GENERAL DISCLOSURES OF ESRS 2



**Tell us where you want to be,
and we will go with you**

6 Our Strategy and Business Model

**SBM-1
Strategy, Business Model, and Value Chain**

Its focus on strength, reliability, and flexibility makes it an indispensable ally for large companies demanding impeccable quality standards. In addition, the ability to adapt to the specific needs of each client and project is one of our main competitive advantages.

TWG is present in key markets for its strategy and also operates in strategic destinations defined by its clients, whom it accompanies in their international growth. It acts as a benchmark partner in the management of industrial, logistics, and production operations. We provide knowledge, technological innovation, and operational capacity to design high value-added solutions, both in the field of mobility and in the supply chain.

With over 25 years of experience, **TWG** has established itself as an international business group with two complementary divisions: TW Logistics (**TWL**), specializing in advanced logistics and comprehensive transport management, and TW Automotive (TWA), a TIER 1 supplier in the production of components for the automotive sector. Both subsidiaries share a goal: to offer comprehensive solutions that boost the competitiveness of our clients' operations.

At **TWL**, we develop customized logistics projects that integrate proprietary technology, automation, and complete traceability. Transport is carried out by capacity providers, who also own the assets used in the process. Our multisectoral experience—which covers automotive, retail, food, large distribution, and chemicals, among others—allows us to adapt our solutions to each client's strategy. We operate internationally with a scalable and flexible model.

On the other hand, TWA plays a key role in the automotive value chain as a Tier 1 for some of the world's leading manufacturers. Our production centers work in sequence with assembly plants, enabling us to offer complete services in logistics, assembly, quality, and management. At TWA, we apply cutting-edge technologies to ensure robust, efficient, and sustainable processes, aligned with the high sector requirements in terms of safety, precision, and emission reduction.

Since its inception, **TWG** has carried out an ambitious growth and internationalization strategy to continue expanding its global presence in relevant markets and industries, thus driving long-term growth. This expansion follows a diversified business model with an integrated structure that combines technical capacity, industrial vision, and commitment to sustainability as the pillars to face future challenges in mobility, production, and logistics.

TWG occupies leading positions worldwide in key industries such as Automotive, where we are an international benchmark in night distribution and JIS/JIT transport; Retail and Fashion, where we stand out for unattended delivery and delivery day flexibility; Food and Beverage, a sector where we are experts in storage and handling tailored to each product and merchandise; Hydrocarbons and Chemicals, whose processes and operations are fully customized; Industry, being able to adapt our facilities to store and manage products with very different characteristics, in addition to offering special services on demand, including manufacturing support.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

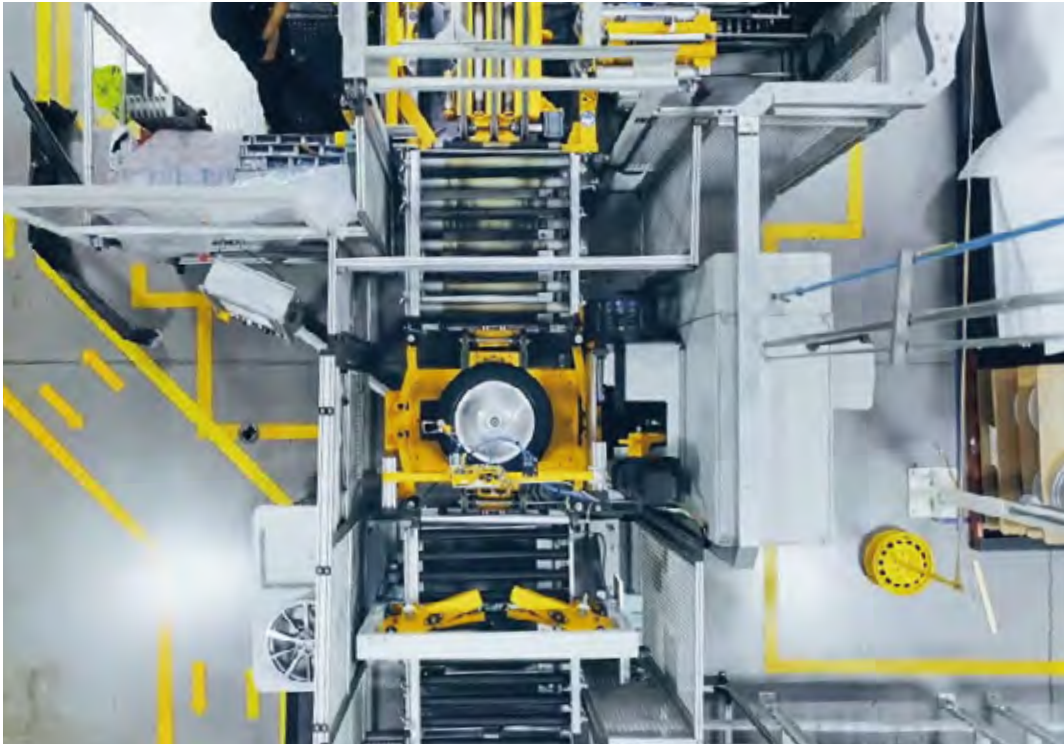
12. Financial Reporting

SBM-1
Strategy, business model and value chain

Our business model



- 3PL
- 4PL
- FTL
- In Night Delivery
- LTL
- eCommerce
- Forwarding
- Multimodal



- Module assembly.
- Sequential assembly of complete wheels.
- MRP- management.
- Sequencing production planning.
- JIS delivery to OEM production lines.
- Full traceability for each component.

About this Report

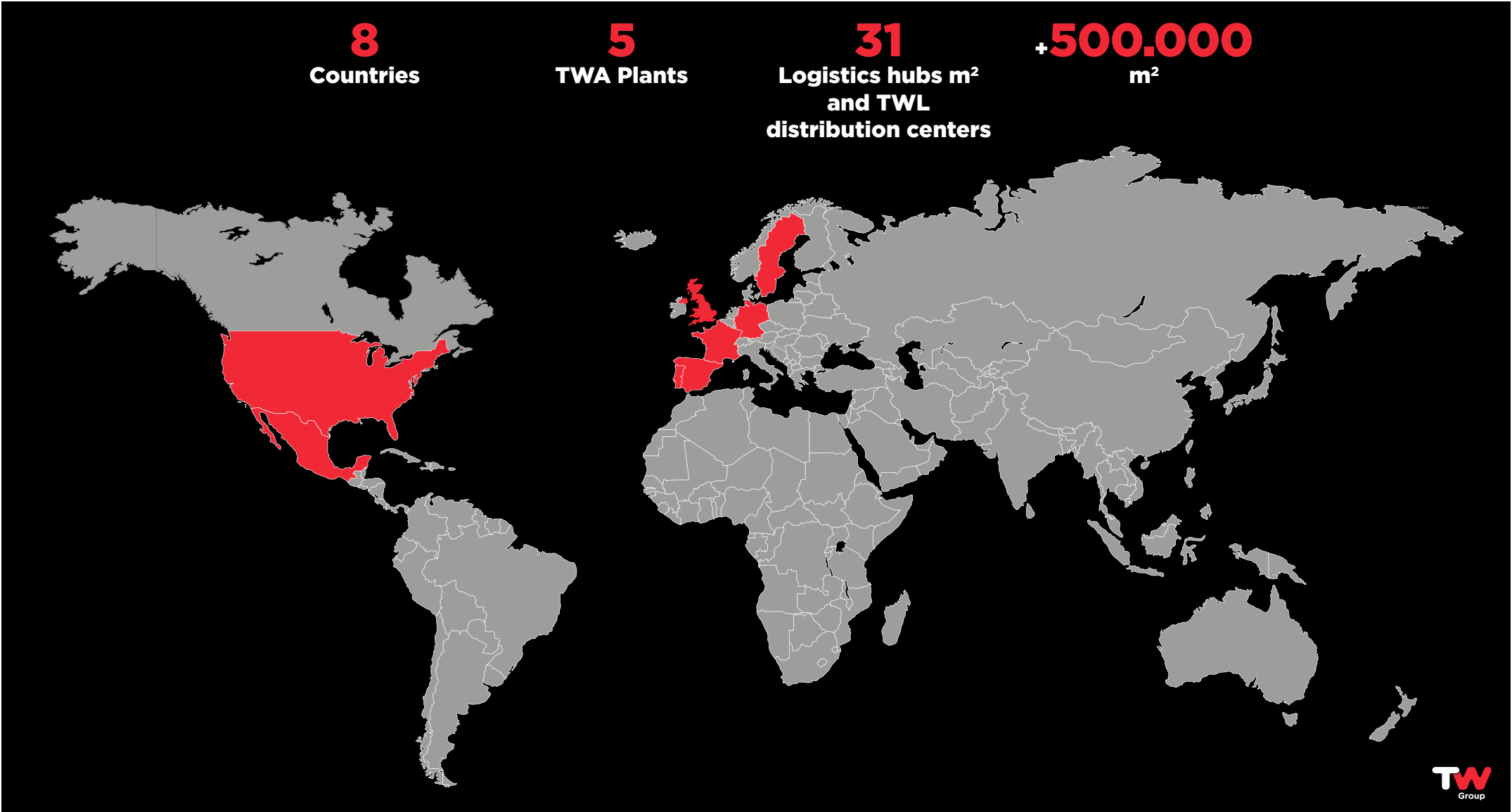
- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting

**No matter how you are,
wherever you go, count on TWG.**



About this Report

- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting



07

Our Stakeholders

TW
Logistics
Official Partner



About this
Report

- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting

7 Our Stakeholders

▾ SBM-2
Stakeholder Interests and Opinions

Engaging with stakeholders is essential for **TWG**'s ability to create value and for our long-term success.

Understanding their views and interests is part of our strategy and business model in various ways, whether by developing low-carbon logistics solutions that reduce the supply chain emissions of our clients, creating a meaningful workplace that supports our growth strategy, or conducting business with integrity in the markets in which we operate.

Engagement on material sustainability matters involves several key players. The Vice President is responsible for communicating the Board of Directors' strategy, while the Chief Sustainability Officer ensures the execution of this strategy. In addition, the Sustainability Committee (CSOS) provides specific information from their respective areas (Environment, Occupational Health and Safety, Human Resources, Quality, Procurement) as needed.

The following table shows how we interact with our main stakeholders, the purpose of these engagements, and their outcomes. Stakeholder opinions inform our due diligence process and materiality assessment, described in more detail in IRO-1.



About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Stakeholders	Communication Channel	Frequency	Relevant topics	Communication strategy- Expectations	Compliance and associated procedures
SHAREHOLDERS	Meetings of the Board of Directors	Monthly	Identification and management of risks and opportunities	Follow-up of the Strategic Plan	Corporate risk matrix (criminal and operational)
	Shareholders' Meeting	Annual	Face-to-face meetings to monitor management and budgetary control, appointment or ratification of Directors, adoption of measures for the development of the corporate purpose.	Review of economic and financial compliance, its evolution in accordance with objectives	Financial Statements - Transfer Pricing Policy - Conflicts of Interest Policy
	Executive Committee meetings	Monthly	Operational performance	Follow-up of results	Executive Committee Reports
	Ethical communication channel	Journal	Regulatory compliance	Regulatory compliance	Code of Ethics - Anti-Corruption Policy - Procedure Ethical Communication Channel - Conflict of Interest Policy
	Corporate financial, sustainability and operational reports	Monthly	Innovation, Cybersecurity, Sustainability	Corporate risk control and transparent reporting	Sustainability Report, Financial Statements, Executive Committee Reports, etc.
CUSTOMERS	Commercial visits	Journal	Quality of Service, corporate sustainability	Compliance with quality agreements and sustainable management	Integrated Quality, Environment and SySL Policy
	Customer Audits	Journal			ISO 9001 - ISO 14001 - ISO 45001 - ISO 22000 Certification -FSR COVER - IATF 16949 -TISAX - VDA
	SAQ Evaluations, RBA	Annual	Sustainable performance	Compliance with sustainable management through certifications	
	Participation in Clusters and Associations	Journal	Opportunities and Risks activity	Innovation monitoring, risk management the activity, expectations and common objectives	Monitoring of innovation, business risks, expectations and common objectives
	Corporate Web	Annual	Sustainable performance - objectives, purpose, mission, management	Transparency	Content update - Sustainability Report
	Ethical communication channel	Journal	Ethics, transparency, Current policies	Transparency - regulatory compliance	TWG Code of Ethics - TWG Anti-Corruption Policy - Ethics Channel Operating Protocol
	Digital channels and telephone	Constante	Complaints and concerns management	Improving customer satisfaction - Data protection - Cybersecurity	ISO 9001 and ISO 14001/Data Protection Policy/Cybersecurity Policy
	Mail Sustainability area: sustainability@tw-group.com	Journal	Sustainable performance - objectives, purpose, mission, management	Transparency	Content update - Sustainability Report
	Satisfaction surveys	Journal	Quality of Service, corporate sustainability	Complaint management and service quality	ISO 9001 and ISO 14001

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

Stakeholders	Communication Channel	Frequency	Relevant topics	Communication strategy- Expectations	Compliance and associated procedures
EMPLOYEES	Direct contact with HR Management	Journal	Work-life balance, Talent attraction and retention, Data protection, Talent development, Remuneration	Management of working conditions and their improvement	Code of Ethics, Anti-Corruption Policy, Human Rights Policy, Inclusion, Diversity and Equal Opportunity Policy, Data Protection Policy and Information Security Policy, Welcome Plan, Equality Plan.
	Works Councils				
	Internal mail				
	Communication boards				
	Equality Commissions		Diversity, Equality and Inclusion		
	Ethical communication channel cce@tw-group.com	Constant	Compliance with the provisions of the EC		Ethical Communication Channel Operating Protocol and CCN Committee Operating Policy
	Occupational Health and Safety Committees	Journal	Occupational health and safety		Integrated Environmental, Quality and Occupational Health and Safety Policy
SUPPLIERS AND SUBCONTRACTORS	Email, Trade fairs, Trade visits, Meetings, Evaluations, Ethical communication channel cce@tw-group. com, Corporate website	Journal	Quality, environmental sustainability (reduction of emissions and circular economy) and social sustainability (respect for human rights).	Ensure line item supply and automation of payments with fair conditions and compliance with agreements - Environmental and social sustainability in the supply chain	Supplier Code of Ethics (CEP), Data Protection Policy, SGI Policy, Sustainable Procurement Policy.
		Journal			
		Annual			
		Eventual			
		Eventual	Cybersecurity, Data Protection, Environmental (emissions reduction) and social (respect for human rights) quality and sustainability.		
		Eventual			
		Journal			
		Journal			
		Eventual			
		Eventual	Data Protection, Quality and Environmental Sustainability		

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

Stakeholders	Communication Channel	Frequency	Relevant topics	Communication strategy- Expectations	Compliance and associated procedures
COMMUNITY	Forums, Conferences, lectures, presentations, meetings	Journal	Social sustainability (human rights) and environmental sustainability (emissions reduction)	Spreading the image of a responsible brand, growth through job creation, attraction of new customers, and talent, promotion of innovation and knowledge, promotion of training.	Code of Ethics, Anti-Corruption Policy, Human Rights Policy, Data Protection Policy and Information Security Policy, Welcome Plan, Equality Plan.
	Linkedin	Eventual	Transparency	Disseminate the responsible brand image and improvement actions and initiatives.	Code of Ethics
	Ethics communication channel: cce@tw-group.com/Web/Linkedin	Constant	Social sustainability (human rights) and environmental sustainability (emissions reduction)		Code of Ethics, Anti-Corruption Policy, Human Rights Policy, Data Protection and Information Security Policy, Sustainable Procurement Policy, etc.
	Forums, Conferences, lectures, presentations, meetings	Eventual	Innovation and Sustainability	Promoting the exchange of knowledge and policy developments	Code of Ethics
		Eventual			
PUBLIC ADMINISTRATIONS	Mail: Sustainability@tw-group.com	Eventual	Environmental sustainability (quantification of emissions)	Compliance with commitments and regulatory frameworks	HCO measurement
	Digital certifications, corresponding websites, Ethical communication channel: cce@tw-group.com		Economic and financial sustainability		Statement of Accounts and NFIs - Sustainability Report
			Data protection		
			Economic and financial, environmental and social sustainability (respect for human rights, creation of quality employment).		
FINANCIAL INSTITUTIONS	Email, Phone, Meetings	Eventual	Economic, financial, environmental and social sustainability	Compliance with commitments and regulatory frameworks	EINF- Sustainability Report, Statement of Accounts, Code of Ethics, CEP, Anti-Corruption Policy, HCO Measurement, etc.

08

Materiality – Assessment Process

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

8 Materiality – Assessment Process

MATERIALITY ASSESSMENT

ESRS 2 IRO-1

Description of the Processes to Identify and Assess Material Impacts, Risks, and Opportunities

During 2023, we carried out our first Double Materiality Assessment, and continued to refine it during this period.

The assessment approach and criteria were established strictly following the requirements set out in ESRS1, focusing on:

- Impact Materiality: Considering the scale, scope, irremediability, and likelihood of impacts that are positive/negative and actual/potential.
- Severity takes precedence over the likelihood of impacts related to human rights under ESRS 1.
- **Financial Materiality:** Assessment of the financial importance of risks/opportunities, their likelihood, and the nature of financial impacts.

Identification of Sustainability Topics

The first step in identifying material topics was to assess the context of TWG’s activities, considering our business activities and relationships, value chain, and affected stakeholder groups. This analysis included sustainability topics and subtopics that were not relevant to our business model, which were omitted from the review.

Stakeholder Engagement

As a key exercise prior to identifying materiality, the Sustainability area mapped all TWG’s Stakeholder Groups, listing them in groups and subgroups (see SBM-2) first, and then prioritizing them as follows:

1. Level of Impact on TWG’s Strategic Sustainability Plan (High/Medium/Low) based on their contribution to the achievement of the Plan’s objectives.
2. Level of Relationship with these stakeholder groups ² (Continuous/Discontinuous).
3. PRIORITIZATION—considering the dialogue channel.

Materiality Scoring Approach

The materiality assessment score was developed based on the methodology and criteria in line with the requirements set out in ESRS 1. All IROs were assessed and scored at a gross level. A sustainability issue was considered material if at least one IRO was above the threshold, indicating materiality of impact, financial materiality, or both. Issues that were not material from a sustainability perspective were those issues for which no IROs³ were identified and/or all IROs ⁴ were found to be below these thresholds. The identification of IROs in relation to business conduct issues involved mapping geographical areas with high potential impacts or risks arising from corruption and bribery (Administration and Finance, Legal and Procurement) through the Corruption Perceptions Index⁵, and human rights violations (Human Resources), for which the Living Wage Analysis tool and the Human Rights Watch World Report⁶ were used. The climate scenarios used are consistent with critical climate-related assumptions in the locations where we operate, based on The Climate Risks in the Transportation Sector⁷. The time horizons and quantitative and qualitative thresholds applied in the IRO scoring were (Short: -1 year/Medium: 1 to 3 years/Long: +3 years). This exercise was approved by the Board of Directors, and on this occasion no surveys were conducted among stakeholders, as those from the previous period were taken into account.

A review was also conducted of internal policies and procedures already systematized and those not yet systematized (increasing their risk level), the criminal risk matrix being developed, insurance policies, and existing contingency plans to minimize risks affecting TWG.

² <https://www.hrw.org/es/world-report/2024>
³ IROs=Impacts, Risks and Opportunities
⁴ <https://www.hrw.org/es/world-report/2024>
⁵ <https://www.transparency.org/en/cpi/2024>
⁶ <https://www.hrw.org/es/world-report/2024>
⁷ UN Environment Sector, May2024

About this
Report

01.
Our Commitments to
Sustainability

02.
Aspects Y2024
Sustainability
Management
Highlights

03.
Our Sustainability
Commitments

04.
Disclosures ESRS 2
general information
Basis for preparation

05.
Governance
of the Sustainability

06.
Our Strategy and
Business Model

07.
Our
Stakeholders

08.
Materiality -
Assessment Process

09.
Environmental
Reporting
ESRS E1 & E2

10.
Social Reporting
ESRS S1, S2 Y S3

11.
Business Conduct
ESRS G1

12.
Financial Reporting

Next steps: Integration, Monitoring, and Review

Currently, there is no systematic process for integrating DMA⁸ results into institutional risk management systems (ERM), but its implementation will be considered in the future. **TWG** is committed to continuing to update our DMA annually and considering the evolution of trends, contextual assumptions and regulatory changes following the incorporation of the Director of the Legal Department, through the work of the Regulatory Compliance Committee (RCC) and its monitoring and approval by the Board of Directors (BoD), although a comprehensive review of the DMA will be carried out periodically by the Sustainability Department to ensure its effectiveness and relevance.

Results of the relative importance assessment (see below)

8 DMA= Double materiality



About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Environmental

E1 Climate

- 1 Climate change adaptation (CCA)
- 2 Climate change mitigation (MCP)

E2 Pollution

- 4 Air
 - Water
 - Soil
 - Living organisms
 - Content

E3 Water and marine resources

- Water extraction
- Marine resources
- Aquatic habitat degradation

E4 Biodiversity and ecosystems

- Direct impact factors on biodiversity loss
- Impact on species status
- Impacts on the extent and condition of ecosystems
- Ecosystem impacts and dependencies

E5 Resource use and circular economy

- Resource inputs and use
- Resource outputs related to products and services
- 7 Waste

Social

S1 Own workforce

- 9 Health and Safety
- 10 Equal treatment and opportunities: Diversity, inclusion of people with disabilities, Gender equality
- 11 Talent development: Training
- 12 Other work-related rights: Data protection

S2 Workers in the value chain

- 13 Working conditions: Health and safety at work, Working hours
- Equal treatment and opportunities
- 14 Other labour rights: Privacy

S3 Affected communities

- 15 Economic, social and cultural rights: Promotion of culture
- Civil and political rights
- Specific rights of indigenous peoples

S4 Consumer and end user

- 16 Customer satisfaction with quality and compliance: Access to information on Quality
- Personal safety of consumers

- Social inclusion of consumers
- Governance

G1 Business conduct

- 18 Corporate culture
- 19 Cybersecurity, Whistleblower protection and Data protection
- Animal welfare
- Political and lobbying activities
- 20 Payment practices with suppliers
- 21 Corruption and bribery

TWG Impact on people and the environment

Impact Materiality	Double Materiality
<div>714151820</div>	<div>2394111213161921</div>
Non material	Financial Materiality
<div>E2: Water, Soil, Living Organisms - E3: Water Resources</div> <div>E4: Biodiversity and Ecosystems / E5: Inputs and Outputs</div> <div>S2: Equal Treatment and Opportunities /S3: Civil Rights, Pol.</div> <div>S4: Security, Social Inclusion and Governance</div> <div>G1: Animal Welfare and Political Activities and Lobbying TWG Financial Impact</div>	<div>1</div>

TWG Financial impact

In total, 175 IROs were identified and evaluated during the DMA, resulting in a total of 10 material issues, as shown in the table below. Of these material topics, the following were determined: for the Environment: 3 negative impacts and 5 risks; for the Social area: 1 negative impact, 6 risks and 2 opportunities; in the Governance area, 2 risks and 1 opportunity were detected.

Report topics excluded from scope

Topics marked with ‘0’ in the list on the left were considered irrelevant from the outset and were therefore not included in the process.

↘ ESRS 2 SBM-3

Material impacts, risks and opportunities and their interaction with the strategy and business model

E1 - E5

MATERIAL RISKS, IMPACTS AND OPPORTUNITIES

CLIMATE CHANGE

Mitigation - GHG emissions from the value chain

Greenhouse gas emissions that contribute to climate change are generated by the transport companies contracted by TWG.

Real negative impact

Mitigation - GHG emissions from the value chain

Inability of the supply chain (transporters) to take action to reduce emissions or inability to reduce emissions, which would lead to higher Scope 3 emissions and, in the event of having to pay fines for emissions, higher costs for the company.

risk

Mitigation - GHG emissions from own operations

TWG owns its own cars and consumes electricity to heat and light its offices and warehouses. These sources generate emissions through the burning of fossil fuels, contributing to climate change.

Real negative impact

Mitigation - GHG emissions from own operations

TWG has its own cars and consumes electricity to heat and light its offices and warehouses. These sources generate emissions through the burning of fossil fuels, contributing to climate change.

risk

Air pollution

The road transport companies contracted by TWG are heavy users of fossil fuel energy sources, which when burned cause greenhouse gas emissions that contribute to climate change. The increase in operations generates more air pollution in the form of pollutants such as NOx, SOx and particulate matter in logistics transport.

Real negative impact and risk

Circular economy - Waste

Waste Suppliers managed by customers of non-recyclable raw materials in assembly causes the impact of not having raw materials of non-renewable and recyclable origin and would imply a risk of financial penalties.

Real negative impact and risk

Position in the value chain

Time horizon

Upstream	Own operations	Downstream	Short term	Medium term	Long term
		●	●	●	●
		●		●	●
	●		●	●	●
	●		●	●	●
●	●	●	●	●	●
		●	●	●	●

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. **Materiality - Assessment Process**

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

E1 - E5		Position in the value chain			Time horizon		
MATERIAL RISKS, IMPACTS AND OPPORTUNITIES		Upstream	Own operations	Downstream	Short term	Medium term	Long term
CLIMATE CHANGE							
Mitigation - GHG emissions							
Loss of strategic customers due to failure to reduce emissions (lack of a decarbonisation plan) poses a risk to the continuity of the company's operations, along with the financial risk that this would entail.	Risk	●	●	●		●	●
Mitigation - GHG emissions							
Impossibility or restrictions on access to different sites due to regulatory pressure that would affect the business.	Risk		●			●	●
Mitigation - GHG emissions							
Inability to meet emissions targets - Slower adoption of low-carbon logistics could put TWG at risk of not meeting its published Scope 3 emissions reduction targets, which would affect the business	Risk		●			●	●
Mitigation - GHG emissions							
The use of AI to optimise logistics and reduce emissions would contribute to improving impact and reducing costs.	Opportunity		●		●	●	●
Mitigation - GHG emissions and air pollution							
Partnerships with transport contractors to ensure that logistics vehicles use biofuel will help to reduce emissions and air pollution.	Opportunity			●	●	●	●
Energy - Energy consumption							
Purchasing more renewable energy would lead to a reduction in emissions and greater competitiveness, as customers are demanding this reduction.	Opportunity		●		●	●	●
Mitigation - GHG emissions							
The development of a Decarbonisation Plan will promote the reduction of emissions, which will lead to a lower environmental impact and greater competitiveness with customers.	Opportunity		●		●	●	

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

S1

MATERIAL RISKS, IMPACTS AND OPPORTUNITIES

OWN WORKFORCE

Working conditions - Occupational health and safety

Employees working in warehouses and assembly activities are at greater risk of physical injury from incidents. Incidents can lead to negative outcomes for those affected, such as pain, reduced well-being and disability, or life-altering loss of life. Safety risks include chemical overheating, leaks, explosions, and the use of complex machinery in assembly

Risk

Working conditions - Occupational health and safety

Pandemics or serious health crises could cause disruption to business productivity

Risk

Equal treatment - Training and development opportunities

TWG's current turnover is high due to the seasonal nature of its logistics activities, but initiatives to retain talent would reduce this.

Actual negative impact and opportunity

Other labour rights - Privacy

The collection and storage of digital data may be vulnerable to cyberattacks, compromising employee privacy and the security of company information

Risk

S2

MATERIAL RISKS, IMPACTS AND OPPORTUNITIES

VALUE CHAIN WORKERS

Working conditions - Occupational health and safety

The risk of reckless driving by transporters could lead to accidents and therefore litigation.

Risk

Working conditions - Working hours

Long working hours by transporters could lead to complaints or litigation.

Risk

Position in the value chain			Time horizon		
Upstream	Own operations	Downstream	Short term	Medium term	Long term
	●		●	●	●
●	●	●		●	●
	●		●	●	●
	●		●	●	●

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

S3

MATERIAL RISKS, IMPACTS AND OPPORTUNITIES

CONSUMERS AND END USERS

Incidents related to information - Access to information (Quality) and data protection and Cybersecurity

Service quality is key to the business. All our warehouses and plants are ISO 9001 certified. At TWL, only 20% of all customers agree to a satisfaction survey, while at TWA, quality conditions are established and monitored directly by customers. Given the amount of customer data we hold, there is a potential risk of a security breach.

Positive Impact, Opportunity, and Risk

Position in the value chain

Upstream Own operations Downstream

Time horizon

Short term Medium term Long term



G1

MATERIAL RISKS, IMPACTS AND OPPORTUNITIES

BUSINESS CONDUCT

Corporate culture - Cybersecurity

Unauthorised access to confidential information or facilities. Theft of data or equipment. Interruption of activities and economic losses. Mandatory compensation for damages caused to users. Damage to the company's reputation. Non-compliance and legal consequences for failing to ensure information security.

Risk

Position in the value chain

Upstream Own operations Downstream

Time horizon

Short term Medium term Long term



Corruption, Bribery and Money Laundering

The risk of money laundering and fraud by the supply chain can lead to litigation. Training and promoting corporate culture, as well as including audits based on the typology and information provided by the risk analysis of the Purchasing and Legal departments, is seen as an opportunity for improvement.

Risk and Opportunity



09

**Environmental
information
ESRS E1 & E2**

About this Report

- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting



⁹ Consumption by subsidiaries is not included.

About this Report

- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting

CLIMATE CHANGE AND CARBON FOOTPRINT

↘ **E1-1**
Strategy and approach

At **TWG**, 99.97% of our emissions are Scope 3 (or indirect) and 0.23% of our emissions are Scope 2 (indirect). For this reason, and since Emissions are a relatively important issue, we are carrying out initiatives to reduce and minimize them.

TWG has quantified greenhouse gas emissions for the years 2022 and 2023, covering scopes 1 and 2, in accordance with the GHG Protocol standard. This reference standard has been applied under the operational control approach.

In addition, we have incorporated these emissions into the Carbon Footprint Registry of the Ministry for Ecological Transition and Demographic Challenge (MITERD) for the Spanish territory in the periods mentioned above.

In order to develop an appropriate Decarbonization Plan, we have included the measurement of Scope 3 in accordance with the GHG Protocol standard for the year 2024. To this end, we adapted our systems and created a platform that allows us to monitor and visualize in one place all quantitative information together with the corresponding evidence.

The results of this measurement are included in this Report and will serve as the basis for developing this Plan during the course of 2025. As a next step, we will validate this Decarbonization Plan through the Science Based Targets Initiative (SBTi). This validation will confirm our roadmap for meeting near-term emission reduction targets.

TWG CLIMATE TRANSITION PLAN

↘ **E1-1**
Transition plan for climate change mitigation

Decarbonization levers

TWG's transition plan will focus during 2025 on decarbonizing transportation emissions and energy consumption in our assembly plants. This will be achieved through the following levers:

- Provide low-carbon logistics solutions based on our flexibility to select carriers that are decarbonizing their assets.
- Partnering with others in the value chain, such as suppliers of biofuel.
- Establishment of short- and long-term objectives for Scopes 1, 2 and 3 supported by science (SBTi Initiative).
- Reducing emissions in our own operations through the purchase of green energy in warehouses and plants and the use of biofuel in our own vehicles.

Integration into TWG strategy

The aforementioned transition plan, which includes the decarbonization levers endorsed by the SBTi initiative, will be integrated into **TWG's** strategy and funded through our annual financial planning process, approved by the Board of Directors (BoD). **TWG's** VP, as a member of the Board of Directors, is responsible for ensuring the implementation and funding of this strategy, which will be deployed from the initiatives. **TWG** is not excluded from the Paris-aligned benchmarks.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

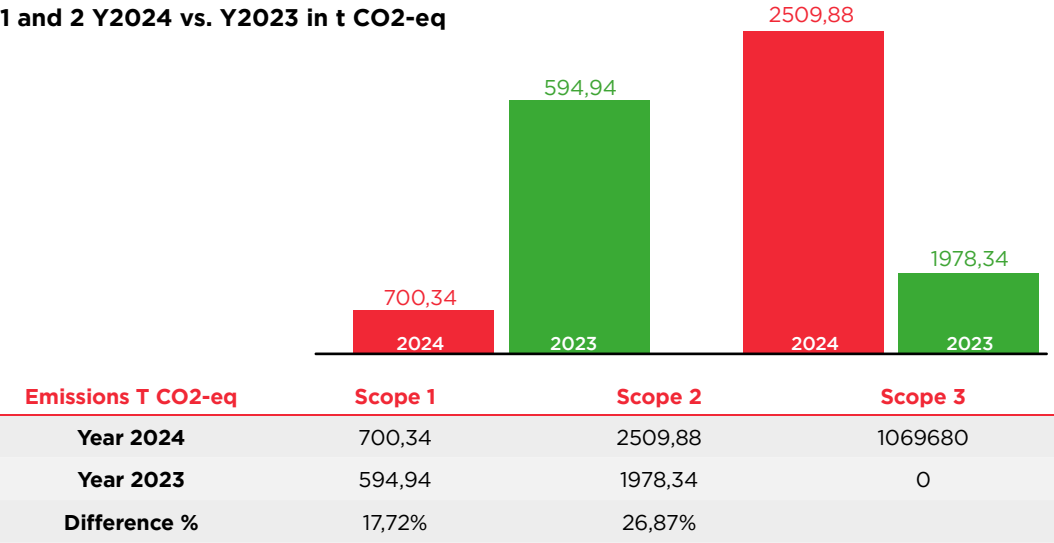
11. Business Conduct ESRS G1

12. Financial Reporting

PRO FORMA EMISSIONS DATA FROM JANUARY 1 TO DECEMBER 31, 2024

The following table includes **TWG** Scope 1, 2 and 3 emissions data:

Comparative Emissions Scope 1 and 2 Y2024 vs. Y2023 in t CO2-eq



The significant increase in renewable energy consumption (316.87%) indicates a positive shift towards more sustainable energy sources. The company is increasing the consumption of renewable energy, although the total increase in energy consumption affects the Scope 1 and 2 emissions ratio (+1.22%) with respect to the previous year. The latter is partly due to the fact that the energy consumption of the Seville, TW Parts and Alicante warehouses (1,127,455 kwh = 147.50 T CO2-eq), which were not included in the previous year, are being included. We attribute the increase in Scope's emissions to 1 to those generated by fixed installations (natural gas consumption in the Swedish warehouse= 91.22 T CO -eq). On the other hand, the increase in fuel consumption vs. the 2 previous year is also due to an increase in the use of company vehicles due to the increase in personnel and activity.

ESRS 2 SBM-3
Impacts of climate change

The materiality assessment described in disclosure requirement IRO-2 identified the following material impacts:

Mitigation - GHG emissions from the value chain

Greenhouse gas (GHG) emissions that contribute to climate change are generated by carriers in logistics activity. This real negative impact occurs downstream in our value chain and is considered systemic to the transportation sector and has short, medium and long term effects on the environment.

Mitigation - Greenhouse gas emissions from our own operations

TWG operates a small fleet of company cars and consumes electricity to power our own operations heating and lighting their offices and warehouses. These sources generate emissions through emissions from the burning of fossil fuels, contributing to climate change. This negative impact occurs in **TWG's** own operations in the short and medium term.

During the reporting year, there have been no environmental emergencies or environmental complaints, sanctions or claims.

ESRS 2 SBM-3
Climate change risks and opportunities

In 2024, **TWG's** environmental managers conducted a climate scenario analysis in collaboration with the insurance company, in addition to reviewing the contingency plans of each of our warehouses and plants. This comprehensive analysis concluded that, due to our business model, we do not face higher costs and technological and investment risks. In addition, physical risks are covered and duly minimized by the corresponding insurance policies, which coincide with the aforementioned contingency plans.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

CLIMATE-RELATED OPPORTUNITIES			HOW TWG'S BUSINESS MODEL AND/OR STRATEGY CAPTURES THE OPPORTUNITY
In the medium term	Technology	<p>Transition to low-emission technology</p> <p>The use of AI will be used for route optimization and real-time monitoring.</p>	<p>Offering low-carbon logistics services</p> <p>✓</p> <p>These solutions will enable us to: Expand our existing offering to meet the needs of existing and new customers. Deliver low-carbon logistics to a greater proportion of customers. detailed analytics and forecasts that help make informed decisions, improving resource planning and management.</p>
	Alliances	<p>Transition to biofuel</p> <p>Alliances with large biofuel suppliers represent an opportunity to offer our carriers competitive prices while contributing to the decarbonization of transportation.</p>	<p>✓</p> <p>By relying less on traditional fossil fuels, the company can mitigate risks associated with oil price volatility and improve energy security and comply with environmental regulations and emission reduction targets set by the authorities.</p>

TWG is taking actions to mitigate climate-related transition risks and take advantage of identified opportunities. These actions are considered part of the strategy determined by the Board of Directors (BoD) in a phased manner to omit the financial risks that could be caused by the necessary investments.

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

CLIMATE TRANSITION AND RISKS- GHG emissions from the value chain

HOW TWG'S BUSINESS MODEL AND/OR STRATEGY MITIGATES RISK

In the medium term	Technology and physical risk	Transition to low-emission technology	✓	TWG's asset-based business model
		Shippers in both the upstream and downstream supply chain will have to decarbonize their assets to meet the emissions requirements of the EU and other countries with the same requirements.		The business model does not have the risk of decarbonizing asset performance, but TWG will promote the use of biofuels in its supply chain either through training and signing commitments or through assessments of future suppliers.
Short-term	Market	Risk of not meeting objectives	✓	Our decarbonization strategy
		Slower adoption of low-carbon logistics may put TWG at risk of not meeting its published emission reduction targets for Scope 1 and 2.		Substitute fossil fuels for cleaner alternatives, such as natural gas, biofuels in its own fleet of vehicles and in the case of acquiring a new vehicle, comply with the provisions of the Sustainable Purchasing Policy.
In the medium term	Reputation and Technology	Failure to meet customer demand may result in a loss of market share.	✓	Reduce fugitive emissions: Identify and repair leaks in equipment and systems that handle gases and fuels, such as pipelines and storage tanks.
		Risk of slow reaction	✓	Our communication strategy
		Failure to act quickly to reduce their emissions can be seen as irresponsible or indifferent to environmental issues.		Maintain open and transparent communication on decarbonization efforts and progress. Publish regular and detailed reports on emissions and actions taken to reduce them.
		Customers may prefer to work with suppliers that demonstrate a strong commitment to sustainability.	✓	Working closely with customers, suppliers and other stakeholders to develop and implement decarbonization strategies
		Slow decarbonization may lead to loss of contracts or business relationships that would affect reputation and operation.	✓	Develop a clear and detailed decarbonization plan with short- and long-term goals. Continually evaluate and adjust strategies to ensure that objectives are being achieved and risks are being mitigated.
			✓	TWG is designing a route optimization system with the objective of providing customers with a service that will allow for optimal planning, enabling faster and more timely deliveries. This will result in improved accuracy and reliability of service, thus positively impacting customer satisfaction and the company's reputation.
			✓	Adhere to internationally recognized initiatives and standards, such as the Science Based Targets Initiative (SBTi), to demonstrate a serious and validated commitment to emissions reduction.

About this Report

- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

E1-2 Policies related to climate change mitigation and adaptation

TWG has an Environmental, Quality and Occupational Safety Policy, which has been reviewed during the year 2023 by the Sustainability Director, aligned to the strategy of the Board of Directors (BoD) and defines and communicates how we work on our environmental performance and sustainability. The policy is binding for all TWG employees. The environmental managers are in charge of communicating this Policy to all TWA plant managers and hub managers at TWL and coordinating the contents and planning trainings in order to make this Policy known to all employees. They also share in the Sustainability Committee (CSOS) the impacts of the procedures and trainings related to this Policy. These trainings are recorded locally and reported on the sustainability platform.

In addition, we have a Sustainable Procurement Policy, drafted by the Sustainability Director and approved by the Regulatory Compliance Committee (RCC) and the Board of Directors (BoD). The purpose of this policy is to require our suppliers to:

- Reduce greenhouse gas emissions and adapt to climate change.
- Improve energy efficiency through renewable energy sourcing and the use of renewable energy sources. efficient use of materials.
- Optimize waste management, prioritizing recycling and circularity.
- Develop technologies that facilitate these improvements.

The legal area verifies that contracts with suppliers include clauses aligned with the requirements of our Sustainable Purchasing Policy and the Purchasing area informs the Sustainability area about the typology so that the latter can carry out the corresponding evaluation of compliance with said requirements.

E1-3 Actions and resources related to climate change policies

TWG has 22 certified warehouses and all plants (except Pilsting, Germany which will be certified by July 2025) to ISO 14001 and is addressing emissions reduction through the following levers and actions:

1. Providing low-carbon logistics solutions

Given that the vast majority of TWL emissions are Scope 3, our decarbonization strategy is focused on helping our customers switch to our portfolio of low-carbon logistics solutions from Innovation. These solutions include the progressive selection of carriers that are decarbonizing their assets.

TWG understands that efficiency and process optimization are essential, so during the course of 2025 it will proceed to:

- Implementation of Online Inventory Tracking Applications which is crucial to maintain an efficient workflow,
- Implementation of warehouse operation tracking systems that optimizes the management of products from receipt to dispatch, streamlining the picking process and resulting in greater operational efficiency.
- Route optimization: through the use of advanced algorithms and data in This will allow us to plan more efficient routes, reducing travel time and fuel consumption.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

2. Partnering with others in the supply chain

Decarbonization of the supply chain is a joint effort. During 2024, **TWG** has carried out the measurement of its Scope 3 and has initiated the evaluation procedure of its suppliers, which will be intensified in 2025. This process begins with the risk assessment of suppliers by the Purchasing area, according to their typology. At the same time, the Sustainability area establishes objectives that are communicated to the Legal, in charge of including them in contracts. The Sustainability area will also carry out evaluations to verify compliance with these objectives during the year 2025.

Given the complexity of the decarbonization challenge, collaboration with our customers and supply chains is essential to move forward. We have therefore held meetings with fuel suppliers to obtain competitive biofuel pricing for our shippers.

TWL promotes 100% electric transport for the distribution of spare parts at Volvo Car France dealerships in Paris.

Through these partnerships, we facilitate zero emissions in central Paris through the Volvo FE Electric, a robust three-axle truck with a gross weight of up to 19 kg. tons. This vehicle will be 100% dedicated to the unattended night distribution of spare parts to Volvo Cars France dealers in Paris. These will be runs of less than 200 km from our headquarters.



As of January 2025, and following an agreement with our customer BMW, we will offer 55 logistics routes in the UK using HVO biofuel. This will result in a 90% reduction in our emissions, which equates to an estimated savings of 3653 tons of CO2 for this operation.



A commitment that is transferred to all logistics services in which we work permanently with specific plans to reduce electricity consumption, waste and emissions, in addition to promoting the reuse of packaging.

3. Establishment of science-based emission reduction targets

During 2024, we have included the measurement of Scope 3 of our Carbon Footprint. In 2025, we will validate our science-based near-term target through the SBTi initiative.

On the other hand, we continue to adhere to the Lean & Green initiative, whose main objective is to motivate companies in the logistics sector to reduce their CO2 emissions and improve the sustainability of their operations, and which promotes the development of a decarbonization plan to reduce emissions by 20% within a maximum period of 5 years. During the year 2025, **TWL** will participate in the Lean & Green Spain Program as part of our continuous improvement and environmental commitment.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

4. Emission reductions in our own operations

During the year 2024, we have proceeded with the acquisition of green energy in 9 warehouses in Spain. This transition supports the development of renewable energy sources. Additional initiatives to r e d u c e energy consumption continue to be carried out, such as having 2 plants and 13 warehouses with LED lighting, sensors and automatic lights off system in 2 plants, air conditioning automation software in the German plant. In addition, we have promoted the use of biofuels on company trips, significantly reducing the use of biofuels.

emissions and encouraged the preferential use of trains instead of airplanes for short-distance travel, contributing to a further reduction of our carbon footprint. During 2025, the Regulatory Compliance Committee (CRC) will develop a Travel Policy containing precepts for reducing emissions from employee travel.

These actions reflect our commitment to protecting the environment and reducing our ecological footprint. We will continue to explore and adopt sustainable practices to contribute to a greener future.

METRICS AND OBJECTIVES

E1-4 Targets related to climate change mitigation and adaptation

During the years 2022 and 2023, we have measured our Scope 1 and 2 Carbon Footprint according to the GHG Protocol which has been verified by an external entity.

In 2024, our objective was to adapt our systems to capture data and include Scope 3 measurement to Scope 1 and 2 emissions, taking into account the reduction initiatives we have undertaken. Based on the results of this recalculation, during 2025 we will proceed with the development of a Decarbonization with targets endorsed by the SBTi initiative, which we expect to complete by the third quarter of 2025. More of our targets can be seen in the graph Table 4) Progress Summary of this Report.

E1-5 Power consumption¹⁰¹¹

Our energy consumption consists mainly of electricity and heating of our warehouses and plants. 9 warehouses already have green energy, generating a total increase of this type of energy of almost 317%. This impact is reflected in the following table, which shows a reduction of 45.10% (54102.33 GJ vs. 78499.87 GJ) compared to the year 2023. By 2025, our plant in Germany will already have 100% green energy, following an agreement reached with the customer.

Energy	Source energy	Year 2024 -GJ	Year 2023 -GJ	Year 2022 - GJ	Difference 2024-2023	Difference 2024-2022	FC Year 2024
Gasoline		1775,12	1101,04	1374,79	674,08	400,33	0.0342
Diesel		3514,26	3571,55	3206,08	-57,29	308,18	0.0386
Natural gas		3.372	1.383	669	1989,27	2702,93	0.038
Diesel		-	200,10	932	-200,1	-931,68	0.038
LPG		2.412	1036,52	1525,41	1375,88	886,99	0.0257
Electricity		39562,79	71.208	110.196	-31645,21	-70633,21	0.0036
Total		50636,5	78499,87	117902,96	-27863,37	-67266,46	

Includes consumption of Natural Gas from the warehouse in Sweden year 2024 that was not included in year 2023.

In 2024 our total energy consumption was 10989.65 Mwh = 2509.88 Tn CO2- eq, corresponding to 1783.86 Mwh of renewable energy and 9205.79 Mwh of non-renewable energy.

10 Consumption of the warehouses in Oporto (Portugal), Illescas, Milton Keynes, Northampton (UK) and Strasbourg (France) is not included as they have not been supplied by the lessors. Natural Gas consumption of the warehouse in Tigery (France) is not available because it was not supplied by the lessor.

11 <https://ingemecanica.com/utilidades/poder-calorifico.html#tabla1>

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

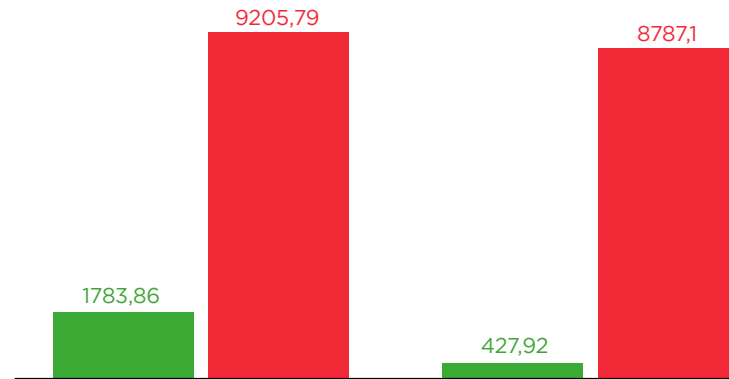
09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

Comparison of Renewable and Non-Renewable Energy Y2024 vs. Y2023 - Mwh



Type of energy	Year 2024	Year 2023
Renewable Energy	1783,86	427,92
Non-Renewable Energy	9205,79	8787,1
Total Energy	10989,65	9215,02

↘ E1-6

Gross Scopes 1, 2, 3 and total GHG emissions

Methodologies, significant assumptions and emission factors used to calculate or measure GHG emissions are provided in the “NEIS E1 Specific Notes” section.

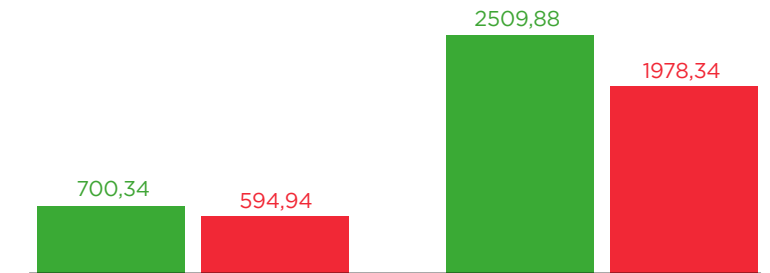
Scope 1+2

The increase in CO2 emissions during the last period is mainly due to the expansion of our operations to new facilities. This expansion has implied an increase in energy consumption.

In addition, during this period we have incorporated energy consumption that we were previously unable to account for due to the lack of supply data. This data was previously unavailable because the supplies were not provided directly by our lessors, which made it difficult to include in our emissions reports.

This situation has resulted in an apparent increase in our emissions, although it actually reflects an improvement in the accuracy and transparency of our energy reporting. We are committed to continuing to optimize our operations and to seek more sustainable solutions to reduce our long-term environmental impact. We will continue to invest in the decarbonization of our vehicles and other CO2e reduction initiatives in our plants, offices and warehouses, such as green power procurement and energy consumption reduction.

Comparison of Emissions Scope 1 and 2 Y2024 vs. Y2023 in t CO2-eq



Emissions T CO2-eq	Scope 1	Scope 2
Year 2024	700,34	2509,88
Year 2023	594,94	1978,34
Difference %	17,72%	26,87%

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Scope 3

During the year 2024, we have measured Scope 3 emissions under the GHG Protocol, including:

Selected Categories

- 1)** Supply of products and services
- 2)** Transportation and Distribution “upstream”
- 3)** General Waste Management
- 4)** Business travel
- 5)** Relocation of employees to jobs
- 6)** Leased assets “upstream
- 7)** Transportation and Distribution “downstream”

Excluded Categories

- 1)** Fixed capital
- 2)** Fuel and energy activities (not included in scope 1/2)
- 3)** Processing of products sold
- 4)** Use of products sold
- 5)** Treatment of products sold at the end of their useful life
- 6)** Downstream leased assets
- 7)** Franchises
- 8)** Investments

Emissions

	Year 2024 -Tn CO2-eq	Year 2023 -Tn CO2-eq	Year 2022 -Tn CO2-eq	Difference 2024-2023	Difference 2024-2022
Scope 1					
Derivatives of fixed equipment	194,05	165	72,05	29,05	122
Derivatives of mobile equipment	506,29	430	405	76,29	101,29
Total direct emissions	700	595	477	105	223
Scope 2					
Indirect emissions from electricity consumption	2509,88	1978	3061	-1083	4144
Total indirect emissions	2.510	1.978	3.061	-1.083	4.144
Total direct and indirect emissions	3.210	2.573	3.538	-978	4.367
Scope 3					
WTT fuel	584				
Raw materials	980.632				
Upstream transport	2.774				
Transport of goods	83.158				
Waste management	549				
Domestic travel	1.389				
External travel	457				
Rentals	138				
Total emissions Scope 3	1.069.680				
Total emissions Scope 1, 2 and 3	1.072.890				

The emission factors used in the calculation of each of these emissions are obtained from official sources (see explanations in the “Specific notes on NEIS E1” section).

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Annuity 2024 (Scope 1+2)		Annuity 2023 (Scope 1+2)		Difference	%
Activity factor (turnover million €)	312	Activity factor (sales)	284	28	9,0%
Emissions ratio (Tn CO2/mill€).	10,28	Emissions ratio (Tn CO2/mill€).	9,06	1,217	11,84%

Annuity 2024 (Scope 1+2+3)	
Activity factor (turnover million €)	312
Emissions ratio (Tn CO2/mill€).	3,44

The ratio of CO2 emissions per million euros invoiced has increased by 1.22% and this is due to a combination of expanding operations, improved accuracy of energy consumption data, and economic growth leading to higher energy consumption.



➤ E1-7
GHG removals and GHG mitigation projects financed through carbon credits

TWG does not have any GHG removals or GHG mitigation projects financed through carbon credits.

➤ E1-8
Internal carbon pricing

TWG does not apply internal carbon pricing schemes in its business.

➤ E1-9
Anticipated financial effects of material, physical and transitional risks and potential climate-related opportunities.

TWG has chosen to exercise the phase-in allowance to omit the financial effects of the material, physical and transitional risks and potential climate-related opportunities required in E1-9.

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

Specific notes on NEIS E1
Reporting period
Our report covers the period from January 1, 2024 to December 31, 2024.
Scope of reporting
The report covers all entities under TWG 's operational control, as mentioned in the 2024 Annual Report. Energy and climate data and CO2e in scopes 1, 2 and 3 cover TWG .
Reporting framework
In reporting CO2e emissions, TWG complies with the Greenhouse Gas Protocol (GHGP).
Recalculations
No recalculations have been performed.
ENERGY AND CLIMATE DATA
The operational control approach applies to all greenhouse gas (CO2e) emissions. Total location-based GHG emissions (tCO2eq)
= Gross Scope 1+ Gross Scope 2 based on location+ Gross Scope 3 total
The total GHG emissions intensity based on net income is calculated using the following formula:
Total GHG emissions (tCO2eq)
Net income (monetary unit)

Scope 1
Data from cars, trucks and forklifts are collected and verified manually by each environmental manager. This year the conversion was performed by an external consulting firm who was in charge of converting the data into CO2e. The emission factors CO2e/liter diesel and CO2e/liter gasoline of the Spanish Office of Climate Change (OECC version 30 of the year 2024) of the year 2024 were applied and for gases the GWP 6 AR was considered. Electricity consumed by electric forklifts is counted in Scope 2 electricity.
Scope 2
Data is calculated following both a location-based and market-based approach. Electricity consumption data is measured in KWh and is manually collected and verified by each responsible for the environment. This year the conversion was performed by an external consulting firm who was in charge of converting the data into CO2e. In the case of missing activity data, electricity consumption has been estimated using an updated average electricity consumption for those Warehouses where data could not be obtained. MITECO and RedEléctrica were used for national sites and the owrworldindata site for international sites.
Scope 3
<i>The data is calculated using both the location-based and market-based approaches. This year the conversion was performed by an external consulting firm who was responsible for converting the data into CO2e. filters its total Scope 3 GHG emissions according to the 15 Scope 3 categories identified by the GHG Protocol Corporate Standard and the GHG Protocol Corporate Value Chain (Scope 3).</i>
<i>3) and that are relevant. For both internal and external trips, the emission factors provided by DEFRA were applied. For internal travel data collection, an internal survey was conducted and external travel data was provided by the travel agency using TWG. For the raw material, the Emission Factor reported by the UK Government (DEFRA) and the Catalan Office for Climate Change (OCCC) was used for each of them, the waste data was obtained from the declarations issued by the external waste management companies. The type of waste managed is available, together with its quantity, and the emission factors used have been obtained from the DEFRA database. The activity data have been extracted from the records provided by the TMS and the Emission Factor reported by the UK government (DEFRA) has been used. In the case of rents, the EF has been calculated using statistical data provided by the INE. in its most updated version.</i>

About this Report

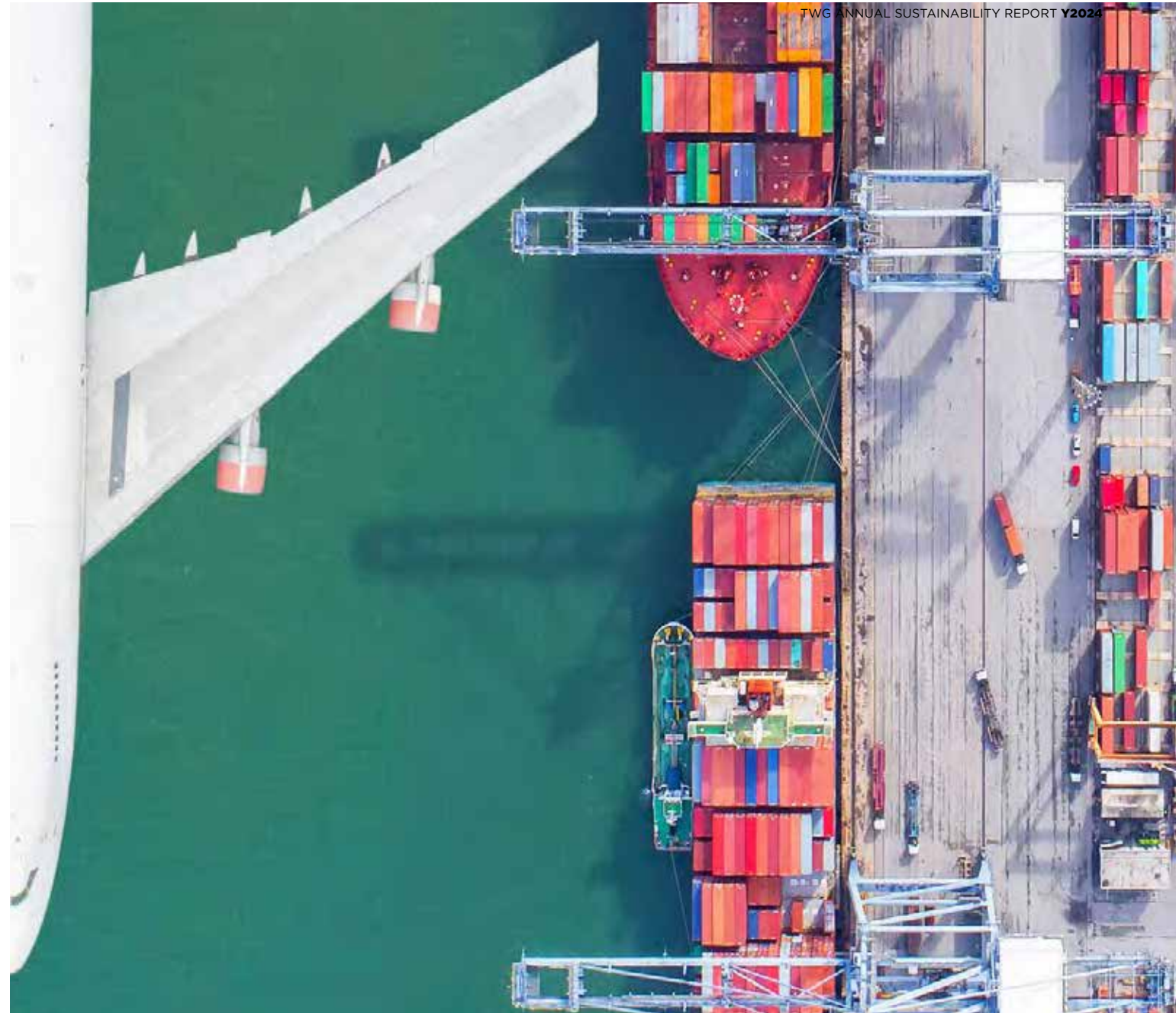
- 01.** Our Commitments to Sustainability
- 02.** Aspects Y2024 Sustainability Management Highlights
- 03.** Our Sustainability Commitments
- 04.** Disclosures ESRS 2 general information Basis for preparation
- 05.** Governance of the Sustainability
- 06.** Our Strategy and Business Model
- 07.** Our Stakeholders
- 08.** Materiality - Assessment Process
- 09.** Environmental Reporting ESRS E1 & E2
- 10.** Social Reporting ESRS S1, S2 Y S3
- 11.** Business Conduct ESRS G1
- 12.** Financial Reporting

DISSEMINATION OF EU TAXONOMY

The EU taxonomy is an essential tool to further the objectives of the European Green Pact, aimed at achieving a carbon neutral and sustainable economy. Through the precise and uniform definition of sustainable economic activities.

TWG Finance will be analyzing its operations and identifying specific sub-activities for inclusion in the taxonomy during the first quarter of 2025 and will continue be adjusted and expanded in line with regulatory and practical developments.

TWG relies on its financial systems, which provide detailed data on divisional, business unit and account activities, as the basis for evaluating taxonomy-related disclosures. These information systems are supplemented by evaluations of the activity of **TWG**'s various business activities and investments to avoid any duplication.



About this Report

01. Our Commitments to Sustainability
02. Aspects Y2024 Sustainability Management Highlights
03. Our Sustainability Commitments
04. Disclosures ESRS 2 general information Basis for preparation
05. Governance of the Sustainability
06. Our Strategy and Business Model
07. Our Stakeholders
08. Materiality - Assessment Process
09. Environmental Reporting ESRS E1 & E2
10. Social Reporting ESRS S1, S2 Y S3
11. Business Conduct ESRS G1
12. Financial Reporting

E2 **POLLUTION**

As a logistics provider, **TWG**'s main pollution-related impact stems from air pollution caused by road transport. By working closely with our customers and our service providers to reduce their transportation-related emissions, we will achieve a corresponding reduction in air pollution within our value chain. This approach is anchored in our environmental policy and addressed in our climate mitigation plans.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

ESRS 2 SBM-3 ***Material impacts, risks and opportunities and their interaction with the strategy and business model.***

Non-GHG pollutants are emitted by our value chain, contributing a real negative impact on the air from gases such as nitrogen oxides (NOx), sulfur oxides (SOx), non-methane volatile organic compounds (NMVOCs) and particulate matter, which are released into the atmosphere from the combustion of fossil fuels by road transport vehicles. When released, these pollutants contribute to the degradation of air quality.

E2-1 ***Pollution-related policies***

The Environment, Quality and Health and Safety Policy commits **TWG** to complying with applicable laws, regulations and legislation covering areas such as air quality, water quality and consumption, responsible handling of chemicals, sustainable resource management and waste reduction. At **TWG**, we are committed to informing our customers about environmental challenges, supporting them in reducing their carbon footprint and influencing suppliers to choose low-carbon solutions wherever possible

(these actions have a corresponding reduction in air pollution in our supply chain). We also have a Sustainable Procurement Policy that promotes the reduction of emissions in our supply chain. The policy is binding for all employees in all countries where we operate. In addition, all employees receive mandatory training on our Environmental Policy to familiarise themselves with the content of the policy, the company's initiatives, objectives and general responsibilities as a global organisation.

E2-2 ***Actions and resources related to pollution***

To address air pollution in the value chain, **TWG** is measuring emissions caused by transporters through the actions described in section E1 Climate Change (Scope 3).

By reducing Scope 3 emissions from fossil fuel combustion in its downstream value chain, **TWG** will also achieve a corresponding reduction in pollutants such as NOx, SOx, NMVOC and particulate matter. More information on **TWG**'s climate mitigation actions is provided in **E1-3**. **TWG** has liability and pollution accident insurance. derived from our activity, as well as the corresponding Contingency Plans.

Strengthening our environmental management system

Most of **TWG**'s organization is covered by our multi-site **ISO 14001** certification, which provides a framework for our environmental management system.

Environmental training and investments

During 2024, environmental training was promoted, reaching a total of 670 hours and corresponding to 2.61 % of total training. Environmental investments were 26,400 in reforestation, new environmental audits, purchase of LED lights and environmental training, vs. 52,043€ of the previous period (-52%).

METRICS AND OBJECTIVES

↘ E2-3

Contamination-related objectives

TWG's science-based targets to reduce Scope 3 emissions will achieve a corresponding reduction in air pollution from its value chain. In view of this, **TWG** has set itself the need during the year 2025 to:

- Transition to HVO: Move 15% of our Scope 3 emissions from downstream and upstream suppliers to HVO. This will help decrease carbon emissions associated with the supply chain.
- Use of Biofuels: Converting own cars and leased vehicles to biofuel. This measure will significantly reduce our Scope 1 emissions, contributing to a smaller carbon footprint.

↘ E2-4

Air pollution

All non-GHG pollutants (NOx, VOCs, PM10 and PM2.5 and SO2) come from **TWG's** value chain. As such, **TWG** does not have data on the amounts of these pollutants or changes over time.

FINANCIAL EFFECTS OF RISKS AND OPPORTUNITIES

CLIMATE-RELATED

↘ E2-6

Anticipated financial impact of risks and opportunities related to material contamination

TWG has elected to exercise the phase-in allowance to omit the financial effects arising from pollution-related impacts and dependencies and how these risks have (or could reasonably be expected to have) a material influence on our position.



About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

ADDITIONAL SUPPLEMENTARY INFORMATION ESRS E3, E4 & E5

E3 WATER AND NATURAL RESOURCES12

Although water consumption is not an issue of relative importance to **TWG**, we are carrying out various improvement initiatives to minimize water consumption.

Water supply is provided by the municipal network in the areas where we operate, so no water source is affected. The wastewater generated is linked to sanitary use and discharged to the sewage system, given that we operate only in areas of industrial parks. As can be seen in the following table, we have consistently decreased the consumption ratio with respect to previous periods. The Legal area is currently working on the inclusion of a contractual requirement to ensure that we are provided with detailed information on water consumption in those warehouses where we currently do not have such information (see footnote).

TWG		Year 2024	Year 2023	Year 2022	Difference 2024 vs 2023	Difference 2024 vs 2022
Water consumption	m³	9.744,96	6.702,49	8.530,47	3.042,47	-1.827,98
Reused water consumption	m³	23,01	21,41	N/D	1,60	
Total	m³	9.767,97	6.723,90	8.530,47	3.044,07	-1.806,57
Ratio vs. turnover	m³/mill	19,56	41,12	59,94	-21,57	-18,82

12 The following are not included: Cabanillas TW1 y TW2 (último semestre), Cabanillas TW3, TW4 y TW5, Cabanillas TW Parts, Larrabetzu, Sevilla, Illescas, Milton Keynes y Northampton (UK) Y Estrasburgo y Surveillers (Francia) due to the lack of invoices from the lessors.

E4 BIODIVERSITY AND ECOSYSTEMS

Our sites are not located in or adjacent to protected areas. Prior to the location of a new warehouse or plant, an EIA is carried out, approved by the competent authorities, and all relevant permits and licences are obtained. In addition, we are ISO 14001 certified, which guarantees regular monitoring and compliance. During the reporting year, there were no environmental emergencies. **TWG** has environmental liability insurance.

E5 CIRCULAR ECONOMY

E5-4 Resource Entry

Our activities do not require a large amount of raw materials. In logistics, we use paper, wood, cardboard and plastic film, which are purchased in bulk. and in accordance with our Sustainable Purchasing Policy, prioritizing the local purchases and recyclable and recycled materials. In the assembly activity, materials such as tires, rims, counterweights and valves are supplied by suppliers selected by our customers. However, we will work in collaboration with them to identify and evaluate suppliers of recycled raw materials.

Currently, our company's purchasing area is conducting a comprehensive evaluation of the costs associated with the acquisition of recycled raw materials. This analysis is crucial to understand and effectively manage operating expenses, thus ensuring the sustainability and profitability of our operations. The increase in demand for recycled raw materials has led to an increase in procurement costs, so the evaluation of these costs will allow us to make informed and strategic decisions to improve our operational efficiency and ensure the economic viability of these sustainability initiatives.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

↘ **E5-5**
Resource outflows

99.9% of **TWG**'s waste is assimilable to urban waste. To facilitate the selective segregation of paper, packaging, organic waste and batteries, our offices are equipped with specific containers. We encourage our employees to use materials appropriately and responsibly, ensuring that paper is only used when strictly necessary. We have procedures associated with the environmental management system to ensure proper waste management and segregation, complying with the regulatory requirements in each country where we operate and delivering waste to authorized waste managers.



Raw Material	Measure- ment	TWA	TWL	Year 2024	Year 2023	Year 2022	Differen- ce 2024 vs 2023	Differen- ce 2024 vs 2023
Soap for ensambling process	Lts	13.362		13.362	37.425	6	-24.063	13.356
Recycled Office Paper	Tons	2,62	4	7	4	0	3	7
Non-Recycled Office Paper	Tons	0,97	349	350	14	23	335	327
Non-Recycled Paper Film	Tons	0,74	53	54	N/A	1		53
Recycled Film Paper	Tons	0	7	7	N/A	N/A		
Non-Recycled Plastic	Tons	0	10	10	N/A	N/A		
Recycled Plastic	Tons	0	4	4	N/A	N/A		
Non-Recycled Wood	Tons	0	56	56	N/A	N/A		
Recycled Wood	Tons	0	158	158	N/A	N/A		
Recycled Cardboard	Tons	0	488	488	N/A	N/A		
Non-Recycled Cardboard	Tons	0	61	61	N/A	N/A		
Non-Recycled Foam	Tons	0	2	2	N/A	N/A		
Recycled Foam	Tons	0	1	1	N/A	N/A		
Counterweights	Tons	223,24		223	N/A	(*)		
Tires	Tons	61,92		62	N/A	N/A		
Tires	Tons	83.550		83.550	N/A	4.562		78.988
Rubber Valves	Tons	35,82		36	N/A	(*)		
TPMS Valves	Tons	61,7		62	N/A	(*)		
N/D= Not Stated								

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting
ESRS E1 & E2

10.
Social Reporting
ESRS S1, S2 Y S3

11.
Business Conduct
ESRS G1

12.
Financial Reporting

In our IT department, we reuse computer equipment and components whenever possible, in order to prolong their useful life. Furthermore, in all our work centers, we have the pertinent authorizations for waste management, in accordance with current legislation.

Each time a waste removal occurs, the responsible personnel ensure that all information is incorporated into the waste management platform.

This makes it possible to obtain and analyze real-time data on the origin and destination of the waste produced. Thanks to this process, environmental managers at warehouses and plants can know the volume of waste removed, prepare reports, analyze the information and keep all the documentary evidence that is needed for the management of the waste ensure compliance with environmental regulations in each country. In addition, better decisions can be made to promote circularity. All data are evaluated by the environmental managers of **TWL** and TWA via the sustainability platform and improvement initiatives are defined in the CSOS together with the sustainability manager.

In summary, we consider that there are four key aspects to take into account:

- Comply with the Sustainable Procurement Policy: Prioritising the purchase of recycled or recyclable materials. The TWA and **TWL** procurement department and the Legal department are responsible for compliance, following an analysis of the associated costs. Comply with the Environmental Policy:
- Complying with the mitigation hierarchy principle (avoid, minimise, restore and ultimately offset) in all activities, promoting the concept of a circular economy in all our processes, promoting the use of materials that are environmentally certified, separable, recyclable and contain recycled materials through management and control by TWA and **TWL**'s environmental managers.
- Promoting waste reduction in offices: Implementing training programmes run by **TWL** and TWA environmental managers.
- Manage WEEE (Waste Electrical and Electronic Equipment): Contacting manufacturers to facilitate reverse logistics. The departments involved are IT and Environment. Create strategic alliances with our customers that can promote and facilitate the transition to the use of recycled materials.

↘ E5-7
Total waste generated

According to the following table 16, non-hazardous waste for disposal has decreased by 28.32% and increased by 86.46% for recovery. With respect to hazardous waste, there has been a 115.65% decrease in disposal and a 95.34% increase in recovery.

Waste generated

Non-hazardous	Year 2024 -Tn	Year 2023 - Tn	Year 2022 - Tn	Year 2021 - Tn	Difference Tn year 2024 vs. 2023	Difference % year 2024 vs 2023
Total to Disposal	541	872,77	2790,83	2064,5	-332,1	-61%
Total to Recovery	5163	1909,87	1370,9	2186,76	3253,13	63%
Total Non-Hazardous Waste	5704	2782,64	4161,73	4251,26	2921,03	51%

Hazardous	Year 2024 -Tn	Year 2023 - Tn	Year 2022 - Tn	Year 2021 - Tn	Difference Tn year 2024 vs. 2023	Difference % year 2024 vs 2023
Total to Disposal	2	18,71	18,93	3,87	-16,239	-657%
Total to Recovery	15	4,67	0,00	10,71	10,029	68%
Total Non-Hazardous Waste	21	23,38	18,93	14,58	2,36	11%

The 86.46% increase in the recovery of non-hazardous waste is a testament to the commitment to sustainability and responsible resource management. This increase reflects a significant effort to reduce environmental impact and promote greener practices, demonstrating a move towards a circular economy.

On the other hand, a 95.34% increase in the recovery of hazardous waste highlights the importance of properly managing hazardous waste and minimizing the associated risks, including those that impact the health and safety of our employees.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

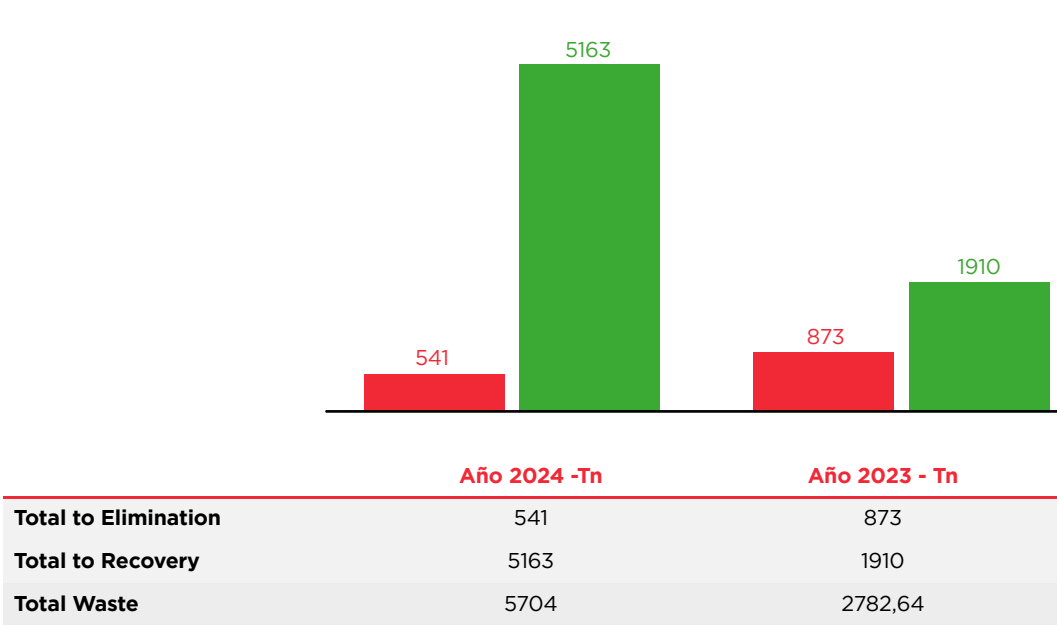
11. Business Conduct ESRS G1

12. Financial Reporting

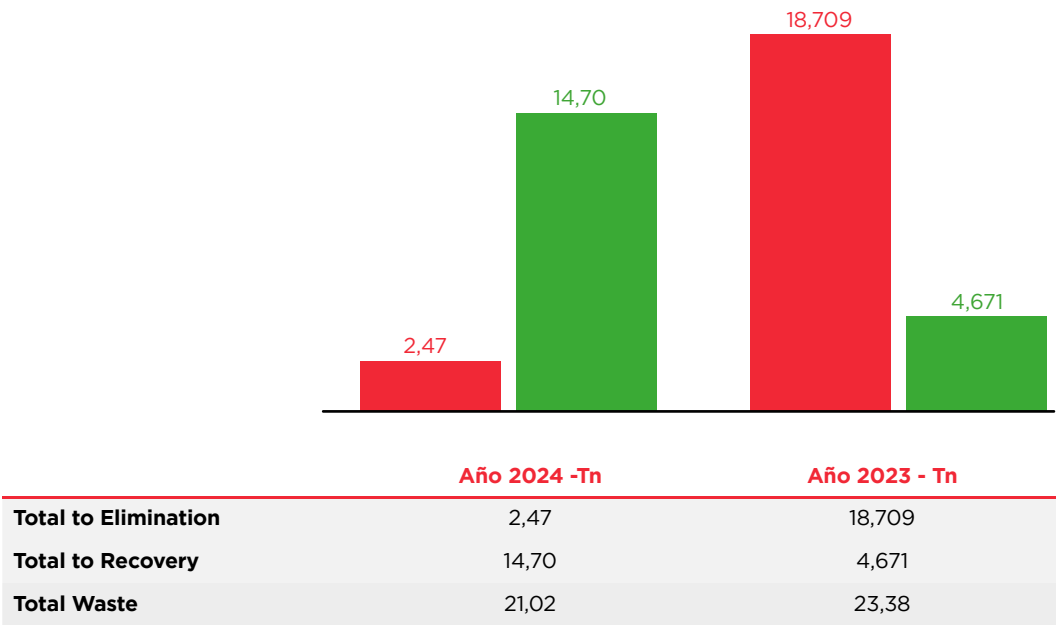
It is important to recognize that, although the amount of waste generated has increased compared to 2023, **TWG** will implement a number of measures to reduce this trend, as mentioned in **E5-5**, can be summarized as follows main:

- Promote the use of reusable products: The purchasing department will encourage the purchase of reusable products in accordance with our Sustainable Purchasing Policy.
- Promote awareness: The Environment department will carry out training on waste reduction.s.

Non-hazardous waste TWG by destination Y2024 vs Y2023 Tn



Hazardous waste TWG by destination Y2024 vs Y2023 Tn



10

Social Reporting ESRS S1, S2 Y S3

A worker in a TW Logistics uniform, seen from the back, standing in a warehouse filled with stacked cardboard boxes. The uniform has 'TW Logistics' printed on the back.

TW
Logistics



About this Report

- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting



10 Social Reporting ESRS S1, S2 y S3¹³

THE PEOPLE

➤ S1

OWN LABOR



13 Includes information on investees

About this Report

01. Our Commitments to Sustainability
02. Aspects Y2024 Sustainability Management Highlights
03. Our Sustainability Commitments
04. Disclosures ESRS 2 general information Basis for preparation
05. Governance of the Sustainability
06. Our Strategy and Business Model
07. Our Stakeholders
08. Materiality - Assessment Process
09. Environmental Reporting ESRS E1 & E2
10. Social Reporting ESRS S1, S2 Y S3
11. Business Conduct ESRS G1
12. Financial Reporting

In line with our objective of **GROWING WITH PURPOSE**, we have defined a roadmap that stands out for carrying out various evaluations, such as:

1. **Market assessment:** Considering factors such as the economic, political and cultural stability of the countries where we operate.
2. **Hiring local talent:** Employing local personnel to take advantage of their knowledge and skills and favor the development of the communities where we operate.
3. **Mapping of local regulations and standards:** Ensure compliance and reduce associated risks by the legal area.
4. **Promoting our diverse and inclusive culture, our policies and procedures** to ensure health and development, encouraging training at all levels and in all areas.

WORKING CONDITIONS AND WORK-RELATED RIGHTS: MANAGING IMPACTS, RISKS AND OPPORTUNITIES

📌 ESRS 2 – SBM-3

📌 S1

Material impacts, risks and opportunities and their interaction with the strategy and business model.

As a fast-growing, expanding company, we operate in a dynamic and target-oriented manner in a constantly changing environment. This enables us to achieve our growth ambitions quickly. However, this growth must be balanced with the capacity and resources of our employees.

To address this situation, we seek to create a positive work environment, with the necessary support systems in place to ensure that our personnel are healthy on the job and have the necessary knowledge to fulfill their assigned tasks..

Our facilities have an external prevention system in Spain and **ISO 45001** certification, safety risks are minimized as much as possible, as explained in I **S1-14**.

The high seasonality of the sector causes a high turnover rate, resulting in higher costs and negative impacts, which we are trying to reduce through intensive training and development opportunities, as reported in **S1-13**.

TWG conducts regular security audits to identify and correct weaknesses in data protection systems and manages incidents to handle any data breaches quickly and effectively, to mitigate risks in this area. More details can be found in **S1-4**.

📌 S1-1

Policies related to own workforce

At **TWG**, we are committed to fostering a thriving workplace based on employee well-being and leadership that promotes health and safety and maintaining a zero tolerance policy towards bullying, harassment, discrimination and offensive behavior. This policy applies to all employees and establishes guidelines for social life, organizational work and the physical environment.

Our approach to working conditions is guided by our Code of Ethics. (EC), to which all employees must adhere and which establishes ethical standards. The EC is complemented by our Human Rights Policy (HRP) and our Inclusion, Diversity and Equality Policy (IDI Policy), as well as our Harassment Protocol (PAC) and our CSR Policy (CSRP). These Policies enshrine our commitment to respect human rights within our sphere of influence and eliminate all forms of modern slavery, forced or compulsory labor, human trafficking and child labor, in line with the ILO Declaration of Fundamental Principles and Rights at Work, comply with laws and regulations regarding working hours, wages and benefits in accordance with industry standards. We do not yet have a Remuneration Policy, which will be developed during 2025.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

TWL's Human Resources Manager and TWA's plant HR managers are responsible for ensuring that all employees receive the necessary induction and training with regard to respect for Human Rights and specifically for the performance of their work. They report to **TWG's** vice president and CHRO, who ensures and leads the mission of attracting and retaining exceptional talent, fostering their success and creating a great place to work, promoting equal opportunities for all employees and job applicants, in line with the **GROW WITH PURPOSE** strategy. Each of the following points will provide more in-depth information on how the HR area ensures compliance with this strategy.

Our Equal Opportunity Policy (EOP) states our commitment to treat all employees and applicants equally, without regard to race, color, religion, sex, national origin, age, sexual orientation, disability or any other protected status.

We prohibit any form of harassment or discrimination and make accommodations for employees with disabilities.

Chief Sustainability Officer will be deepening the Human Rights Due Diligence model during the year 2025 in conjunction with the HR area.

Guidelines for ensuring the physical safety of employees, including emergency procedures and incident investigation, are set out in our Integrated Environment, Quality and Occupational Health and Safety (EHS) Policy. Regional directors and managers are responsible for their implementation in each warehouse and plant and report to the Environment, Quality and Health and Safety at Work managers at TWA and **TWL**. The latter evaluate the performance and relevant KPIs on a monthly basis and endorse or require additional specific training to improve this performance.

All employees in all countries are required to adhere to **TWG's** Code of Ethics (CE), and we ensure that they know and understand their ethical obligations by of mandatory training on the Code of Ethics (CE) either through our e-learning platform or by the local HR area that records these trainings.

All policies are communicated to employees and are visible at each of our locations. Please see more information in section **G-1**.

➤ S1-2

Processes for interacting with own workforce and worker representatives on impacts.

All employees can raise concerns directly with their direct supervisors, and regarding non- compliance with our Code of Ethics (CE) or complementary Policies, they can make use of the ethics communication channel (the operation of which is described in Section 11- G1). During the course of the year 2024, **TWG** has conducted Performance Evaluations to 5.64% of the workforce, which will be increased during the year 2025 by 10% and exit surveys will be conducted to determine the causes and establish appropriate actions. We have a total of 7 Works Councils in Spain, France and Sweden, which account for 12.88% of the total workforce and deal with issues such as working conditions and regularization of supplementary working hours. These committees meet on a quarterly basis. In those countries where there are no Committees, during the year 2025, HR managers led by the **TWG** VP and CHRO will carry out different initiatives such as:

- Regular meetings: Organize regular meetings with employees to discuss important issues, receive feedback and maintain open communication.
- Surveys and questionnaires: Use anonymous surveys to obtain opinions and suggestions from employees on various aspects of the job and the work environment.

➤ S1-3

Processes to remediate negative impacts and channels for the workforce itself to raise concerns

Employees are encouraged to report any concerns or complaints regarding harassment, suspected legal or financial irregularities, or other concerns to their immediate supervisor, the Human Resources department, or through the ethics communication channel managed by the Compliance Committee (CCN), which is described in detail in **G1-1**, Business Conduct and Corporate Culture. Employees may report concerns safely and anonymously in accordance with the Operating Regulations of the ethics communication channel.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

📌 S1-4

Adoption of measures related to double materiality incidences on own personnel during the year 2024.

The health and safety of our own workforce was identified as an issue of relative importance in our double materiality exercise. We are focused on supporting the health and well-being of our employees. In 2024, **TWG** signed the Luxembourg Declaration, which sets out the basic principles and framework for good employee health management, with the aim of improving the well-being and health of our employees across all our operations. In addition, we are certified to ISO 45001:2018, which endorses our management and ensures the consistency of the methodology of the relevant protocols. Our Environment, Quality and Occupational Safety Policy was updated by the sustainability department in 2024 to align it with the company's strategy. The procedures and results are monitored by **TWA** and **TWL**'s Occupational Health and Safety managers to protect the interests of employees in relation to the work environment. All safety incidents are reported in the Health and Safety Management System and are part of **TWG**'s non-financial disclosures. We investigate all incidents and review them with customers and any other interested parties involved. There are currently six Occupational Health and Safety Committees. See additional measures in **S1-14**.

The seasonal nature of **TWG**'s operations involves periods of high and low demand, leading to the temporary hiring of employees who may seek other opportunities when demand declines. To counteract this turnover, **TWG** is committed to increased employee training and development (see more details in S1-13). This makes **TWG** an attractive company, as continuous training allows employees to better adapt to changes in the company or the market, which is crucial in high-turnover environments and helps attract potential candidates. Training is a tangible opportunity that positively impacts our activities, generating a greater social impact in the communities where we operate.e.

TWG has an in-house workforce of over 1700 employees, which involves the management of a large amount of personal data. This situation represents a potential risk of data breaches,

which can result in significant costs, severe fines, lawsuits and other legal proceedings. In addition, loss of employee trust can negatively affect employee morale and retention. Therefore, we only collect information that is essential and necessary for our business operations, thereby reducing the risk of exposure of personal data, and we use encryption technologies to protect sensitive information both in transit and in transit.

As well as at rest, we have an SGI Policy¹⁴ that complies with the RGDP¹⁵ to identify and correct weaknesses in the data protection systems. **TWG** has an outsourced DPO - dpo@tw-group.com - in Spain and in the rest of the countries we have external legal counsel whose control is under **TWG**'s legal area. We have a **Data Protection Policy**, which has been revised during the year 2023 and there has been no processing, nor has any communication associated with data privacy been responded to or remedied.

📌 S1-6

Characteristics of the company's salaried employees

Headquartered in Pamplona, **TWG** is present in 8 countries in Europe and America with more than 1700 employees. The company's own workforce has increased by 30.99% versus the previous year, in which 41% are women and 59% are men, while the previous year 27.63% were women and 72.63% were men. The proportion of women increased by 92% compared to the previous year.

¹⁴ Information Security

¹⁵ General Data Protection Regulation

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Distribution by country and gender	YEAR 2024 (*1)			YEAR 2023	YEAR 2022	YEAR 2021	Difference 2024 vs 2023	Difference 2023 vs 2022	Difference 2023 vs 2021
	Women	Men	Total						
SPAIN	461	508	969	554	479	545	415	75	9
FRANCE	46	119	165	158	157	128	7	1	30
PORTUGAL	12	30	42	36	46	52	6	-10	-16
GERMANY	25	46	71	74	91	35	-3	-17	39
USA	13	46	59	66	68	77	-7	-2	-11
MEXICO	97	270	367	365	339	335	2	26	30
SWEDEN	51	17	68	79	2	-	-11	77	79
UK	5	8	13	7	5	-	6	2	7
Total Employees by gender	710	1.044	1.754	1.339	1.187	1.172	415	152	167
Percentage of employees by gender	40%	60%	100%						

Distribution of types of employment contract and working hours	YEAR 2024	% of total	YEAR 2023	% of total	Difference 2024 vs 2023	Difference Año 2024 vs. Año 2023 %	AÑO 2022	YEAR 2021	Difference 2024 vs 2021
Fixed or Indefinite	1.518	86,5%	1.234	92,2%	284	23,0%	1.103	1.030	488
Temporary	235	13,4%	101	7,5%	134	132,7%	84	142	93
Scholarship or paid internship	1	0,1%	4	0,3%	-3	-75,0%	-	-	1
Total	1.754	100,0%	1.339	100,0%	415	31,0%	1.187	1.172	582
Full-time	1.421	81,0%	1.294	96,6%	127	9,8%	1.154	1.159	262
Part-time	333	19,0%	45	3,4%	288	640,0%	33	13	320
Total	1.754	100,0%	1.339	100,0%	415	31,0%	1.187	1.172	582

86.5% are permanent contracts and 81% are full-time contracts. Seniority average is 4 years and the average number of people promoted is 4.8%.¹⁶

¹⁶ The number of practices carried out has been higher than shown in the table. However, the Power BI system or platform has not captured this data since the beginning of the year, considering it to be temporary.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

The turnover rate takes into consideration the number of new hires, which totaled 966 in 2024, and the number of terminations, which totaled 551, as shown in the tables below:

Unbundling	YEAR 2024	YEAR 2023	YEAR 2022	Difference Year 2024 vs. Year 2023	Difference Year 2024 vs. Year 2023 %	Difference Year 2024 vs. Year 2022
Voluntary Discharge	325	398	284	-73	-18%	471
Dismissal	226	141	192	85	60%	56
Total	551	539	476	12	2%	527

In 2024, the employee turnover rate was 28.09%. (see table in this section), of which 52.27% corresponds to Mexico and 32.85% to Spain, 34.66% women and 65.34% men.

Number of Disengaged by Gender	YEAR 2024	YEAR 2023	Difference
Woman	191	122	69
Man	360	417	-57
Total	551	539	12

Number of Disengaged by Age	YEAR 2024	YEAR 2023	Difference
Up to 30 years	285	249	36
Between 31 and 50 years old	224	252	-28
More than 50 years	42	38	4
Total	551	539	12

Number of Disengaged by Professional Category	YEAR 2024	YEAR 2023	Difference
Executives and Managers	5	8	-3
Middle Management and Qualified Technicians	50	58	-8
Administrative	42	56	-14
Operators	454	417	37
Total	551	539	12

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

The average number of contracts can be seen in the tables broken down by type of contract, gender, age and professional category.

	YEAR 2024		YEAR 2023		YEAR 2022		Difference 2024 vs 2022	
Average number of contracts by gender, type of contract and working day - comparative year 2022	Men	Women	Men	Women	Men	Women	Men	Women
Fixed	952,00	500,00	793,41	295,89	778,26	302,39	173,74	204,11
Temporary	34,00	41,00	51,57	24,05	67,86	22,10	-33,86	16,95
Scholarship or paid internship	2,00	0,00	2,31	0,21	0,00	0,00	2,00	-0,21
Total	988,00	541,00	847,29	320,14	846,12	324,49	141,88	220,86
Part-time	35,00	116,00	15,07	22,37	10,14	23,30	24,86	93,63
Full-time	953,00	425,00	832,21	297,77	835,98	301,19	117,02	127,23
Total	988,00	541,00	847,29	320,14	846,12	324,49	141,88	220,86

	YEAR 2024			YEAR 2023			YEAR 2022			Difference 2024 vs 2022		
Average number of contracts by age, type of contract, and type of day - comparative year 2022	Under 30	Between 30 and 50	Older than 50	Under 30	Between 30 and 50	Older than 50	Under 30	Between 30 and 50	Older than 50	Under 30	Between 30 and 50	Older than 50
Fixed	402,00	799,00	250,00	269,84	652,98	166,49	304,45	648,56	127,64	97,55	150,44	122,36
Temporary	34,00	35,00	8,00	31,37	35,75	8,49	35,93	43,59	10,43	-1,93	-8,59	-2,43
Scholarship or paid internship	1,00	0,00	0,00	0,31	1,21	1,00	0,00	0,00	0,00	1,00	0,00	0,00
Total	437,00	834,00	258,00	301,51	689,93	175,98	340,38	692,15	138,07	96,62	141,85	119,93
Part-time	30,00	82,00	40,00	6,45	23,95	7,06	1,52	27,75	4,17	28,48	54,25	35,83
Full-time	407,00	752,00	218,00	295,07	665,99	168,92	338,87	664,40	133,90	68,13	87,60	84,10
Total	437,00	834,00	258,00	301,51	689,93	175,98	340,39	692,15	138,07	96,61	141,85	119,93

	YEAR 2024				YEAR 2023				YEAR 2022			
Average contracts by professional category, type of contract and working hours - comparison for 2022	Executives and Managers	Middle managers and qualified technicians	Administrative	Operators	Executives and Managers	Middle managers and qualified technicians	Administrative	Operators	Executives and Managers	Middle managers and qualified technicians	Administrative	Operators
Fixed	65,00	229,00	209,00	875,00	75,45	168,00	188,73	657,12	76,27	193,88	184,40	626,10
Temporary		2,00	3,00	146,00	0,00	1,15	4,59	69,88	0,00	0,56	3,55	85,83
Scholarship or paid internship					1,00		0,51	1,00	0,00	0,00	0,00	0,00
Total	65,00	231,00	212,00	1021,00	76,45	169,15	193,83	728,00	76,27	194,44	187,95	711,93
Part-time	0,00	2,00	3,00	146,00	0,00	0,00	3,21	34,24	0,00	0,11	11,38	21,95
Full-time	65,00	229,00	209,00	875,00	76,45	169,15	190,62	693,76	76,27	194,35	176,57	689,98
Total	65,00	231,00	212,00	1021,00	76,45	169,15	193,83	728,00	76,27	194,46	187,95	711,93

↘ S1-7

Characteristics of the company's non-salaried employees

Because demand in the logistics sector can vary significantly depending on the season, hiring temporary staff allows us to quickly adjust our workforce according to current needs. This helps us better manage our operating costs, as the selection processes are more agile, allowing us to fill vacancies quickly and maintain the continuity of our operations. These seasonal fluctuations in labour demand in the logistics sector are evaluated jointly by the HR department and the business areas. Temporary employment agencies give us access to a wide network of skilled and talented workers, which helps reduce local employment. Given that the respective Human Resources departments in each country are responsible for hiring temporary employment agencies that are recognised in the sector, with extensive experience and a solid reputation, optimised procedures for personnel management, knowledge of the local labour market and its

specific regulations, as well as acceptance of the precepts of our Supplier Code of Ethics (CEP), we have so far managed to ensure regulatory compliance, the protection of workers' rights and their better integration into our company. However, during 2025, the HR department, chaired by **TWG's** Vice President and CHRO, will undertake to identify and assess the potential and actual risks to human rights associated with the use of such companies (TEA)*, as indicated in this Report. This objective includes considering the geographical context, the sector and compliance with the various relevant regulations, with the involvement of **TWG's** legal department. In addition, the findings of the risk assessments in the company's processes and policies will be shared with the Regulatory Compliance Committee (RCC), a procedure that will allow for the adjustment of hiring and supervision practices to mitigate the identified risks.

División	Año 2024				Año 2023				Difference % country of Workers who are not Employees Year 2024 vs Year 2023	
	Country	Workers for ETTs that are not employees	Staff Employees	% by country of Workers that are not Employees	Country	Workers for ETTs that are not employees	Staff Employees	% by country of Workers that are not Employees		
TW Logistics & TWG Subsidiaries	Total	395	1248	24,04 %	Total	387	818	32,12 %	8	-8,07 %
	Portugal	55	42	56,70 %	Portugal	40	36	52,63 %	15	4,07 %
	España	216	958	18,40 %	España	263	538	32,83 %	-47	-14,44 %
	Francia	105	165	38,89 %	Francia	70	158	30,70 %	35	8,19 %
	Suecia	19	68	21,84 %	Suecia	14	79	15,05 %	5	6,79 %
	USA	0	2	0,00 %	USA	0	0	0,00 %	0	0,00 %
	UK	0	13	0,00 %	UK	0	7	0,00 %	0	0,00 %
TW Automotive	Total	26	506	4,89 %	Total	155	521	22,93 %	-129	-18,04 %
	México	0	367	0,00 %	México	127	365	25,81 %	-127	-25,81 %
	USA	10	57	14,93 %	USA	14	66	17,50 %	-4	-2,57 %
	Alemania	16	71	18,39 %	Alemania	14	74	15,91 %	2	2,48 %
	España	0	11	0,00 %	España	0	16	0,00 %	0	0,00 %
Totales		421	1754	19,36%		542	1.339	28,81 %	-121	-9,46 %

*TEA:Temporary Employment Agencies

As can be seen, 98% of the personnel of temporary employment agencies collaborate with **TWG** in the category of operators.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

➤ **S1-8**

Coverage of collective bargaining and social dialogue

76% of our total workforce is covered by collective bargaining agreements. However, in countries such as the United States, Germany, and the United Kingdom, local legal frameworks, customary practices, and specific regulatory provisions explicitly exclude certain employee groups from the scope of these agreements.

The working conditions of these employees, who are without a collective agreement, are determined by individual negotiation (for example, salary), although the HR department, led by the VP and CHRO, will carry out a living wage¹⁷ measurement exercise during 2025. We have works councils, with employer and union representatives, in companies with more than 50 employees, which meet bimonthly or quarterly. Additionally, in France, we have had 3 works councils since 2019, and in Sweden, 2 councils. They have addressed employee-related issues in monthly meetings, such as working conditions and the regulation of overtime hours.

Own personnel covered by collective bargaining agreement

Country	No. of employees covered	% covered	No. of employees not covered	% not covered
Spain	969	100,0%	0	0,0%
USA	0	0,0%	59	100,0%
Mexico	85	38,8%	282	61,2%
UK	0	0,0%	13	100,0%
France	165	99,9%	0	0,1%
Germany	0	0,0%	71	100,0%
Portugal	42	100,0%	0	0,0%
Sweden	67	98,6%	1	1,4%
Total	1328	76%	426	24%

➤ **S1-9**

Diversity, Equality and Inclusion Parameters

At **TWG**, diversity, equity and inclusion are viewed as value-creation opportunities. These principles are deeply embedded in our corporate culture and are reflected across all our Policies and Procedures. This includes our recruitment processes, which are designed to ensure transparency and to fill positions with the most qualified individuals—regardless of their personal circumstances. In Spain, we currently have three Equality Plans in place, all of which have been formally registered.

TWG continued to reaffirm its commitment to a more gender-diverse workforce in a traditionally male-dominated industry. The proportion of employees was 59% male and 41% female. The proportion of women in decision-making positions reached 25.74 % in 2024 (2023: 23%) and the proportion of women in our own workforce increased by 92% vs. 2023 (710 vs. 370). 21.4% of our workforce are foreign nationals, demonstrating our commitment to diversity.

17 Metodología Anker

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

Distribution by category professional and gender	YEAR 2024				YEAR 2023					
	Female	Male	Total	Difference 2024 vs. 2023	Total	% of total	YEAR 2022	YEAR 2021	Difference 2023 vs 2022	Difference 2023 vs 2021
Executives and Managers	12	55	67	-11	78	6%	74	67	4	11
Middle Managers and Qualified Technicians	66	170	236	54	182	14%	190	271	-8	-89
Administrative	110	98	208	-6	214	16%	199	196	15	18
Qualified	522	721	1.243	378	865	65%	724	638	141	227
Total	710	1.044	1.754	415	1.339	100%	1.187	1.172	152	167

Number of Employees by Age	YEAR 2024	% del total	YEAR 2023	Difference 2024 vs. 2023	Difference Year 2024 vs. Year 2023 %	YEAR 2022
Up to 30 years	510	29%	385	125	32%	357
Between 31 and 50 years old	950	54%	768	182	24%	700
More than 50 years	294	17%	186	108	58%	130
Total	1.754	100%	1.339	415	31%	1.187

As can be seen in the table below, **TWG** has a 29% share of employees under 30 years of age, 54% between 30 and 50 years of age and 17% over 50 years of age.

Our Code of Ethics and the Policies that complement it, such as the Policy of Inclusion, Diversity and Equal Opportunity and the Harassment Protocol reinforce **TWG's** commitment based on internal HR procedures and the monitoring of performance indicators (KPIs) aligned with the strategy, which are assessed bimonthly by the Sustainability Committee - CSOS.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

📌 S1-10 y S16

Adequate Salaries and Compensation Parameters

All our employees in European countries receive fair remuneration in line with Directive (EU) 2022/2041. Additionally, 100% of our employees in non-European countries are paid appropriately according to the applicable national standards. In 2025, our Human Resources department will carry out the assessment as outlined in the methodology referenced above.

During 2025, the VP and CHRO will carry out a new assessment together with the head of the legal department, based on the new human rights risk matrix on regulatory compliance required in countries outside the EU, which will reinforce our commitment to ensuring that all our employees are subject to fair pay and working conditions. In

addition, a Remuneration Committee will be set up to periodically review that **TWG** employees receive adequate salaries in accordance with applicable benchmarks. This Committee will review salaries to determine whether they are adequate based on the requirements of CSRD AR72, 73 and 74 for employees in the EEA and non-EEA. (EU Directive 2022/2041 of the European Parliament), it will include the requested information on total remuneration in accordance with AR102 and report accordingly in the 2025 Annual Report. The average remuneration of directors, including variable remuneration, allowances, compensation, payments to long-term savings schemes and any other remuneration broken down by gender, is included in the annual financial statements, which are pending closure, and this information will therefore be included in the next EINF.

Average gross salaries by category, gender and age

Gender Age Category	Female				Male				Average Gross Hour
	< 30 years	31 - 50 years	> 51 years	Total Female	< 30 years	31 - 50 years	> 51 years	Total Male	
	Gross hour			Gross hour	Gross hour			Gross hour	
Administrative	14,84 €	14,38 €	18,79 €	14,93 €	15,66 €	15,76 €	11,14 €	15,07 €	14,99 €
Executives and Managers	10,67 €	27,14 €		22,65 €	28,66 €	32,46 €	41,58 €	34,44 €	31,35 €
Middle Management and Qualified Technicians	11,77 €	24,31 €	13,19 €	17,91 €	18,91 €	21,64 €	13,87 €	19,27 €	18,73 €
Operators	13,83 €	12,03 €	11,13 €	12,47 €	13,03 €	14,78 €	13,75 €	13,89 €	13,33 €
Total	13,56 €	17,82 €	13,09 €	15,52 €	16,35 €	21,00 €	18,54 €	19,07 €	17,61 €

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Average gross salary by country and gender

Genre	Woman	Man	Average Gross Hourly
	Bruto hora	Bruto hora	
Country			
Germany	23,62 €	25,57 €	24,60 €
Spain	15,86 €	20,49 €	18,85 €
United States of America	16,29 €	27,61 €	23,44 €
France	23,89 €	22,59 €	23,14 €
Mexico	1,90 €	2,09 €	2,01 €
Portugal	7,45 €	14,71 €	11,08 €
United Kingdom	24,19 €	38,02 €	32,26 €
Sweden	18,82 €	18,99 €	18,90 €
Total	15,52 €	19,07 €	17,61 €

The ratio of annual compensation¹⁸ in **TWG** by country and gender is as follows:

Country	YEAR 2024	Genero	Annual Compensation Ratio of
Spain	2,77	Woman	6,74
USA	3,75	Hombre	5,97
Mexico	1,80	Total	6,37
UK	3,72		
France	2,32		
Germany	2,49		
Portugal	2,81		
Sweden	1,32		

¹⁸ Total annual compensation of the company's highest paid person/median of the total annual compensation of employees, excluding the highest paid person.

The salary gap¹⁹ by country and by category is shown below:

Wage gap by country	YEAR 2024	Wage Gap by Category	YEAR 2024
Spain	22,6	Executives and Managers	34,24%
USA	41,02	Middle Management and Qualified Technicians	7,05%
Mexico	9,21	Administrative	0,92%
UK	36,39	Operators	10,26%
France	-5,74		
Germany	7,63		
Portugal	49,34		
Sweden	0,92		
Total wage gap	18,59		

Therefore, the total wage gap in **TWG** for the year 2024 is 18.59 as shown in the table above.

S1-11
Social Protection

TWG employees are covered by social protection through public programs offered in the countries where we operate against loss of income due to illness, unemployment, work-related accidents, parental leave and retirement. **TWG** does not offer additional protection measures (health insurance or retirement plans) to those established by the regulations of each country.

¹⁹ ((Average gross hourly wage level of salaried employees-Average gross hourly wage level of salaried employees/(Average gross wage level of male employees))*100

About this
Report

01.
Our Commitments to
Sustainability

02.
Aspects Y2024
Sustainability
Management
Highlights

03.
Our Sustainability
Commitments

04.
Disclosures ESRS 2
general information
Basis for preparation

05.
Governance
of the Sustainability

06.
Our Strategy and
Business Model

07.
Our
Stakeholders

08.
Materiality -
Assessment Process

09.
Environmental
Reporting
ESRS E1 & E2

10.
Social Reporting
ESRS S1, S2 Y S3

11.
Business Conduct
ESRS G1

12.
Financial Reporting

📌 **S1-12**

People with disabilities

At **TWG**, inclusion, equity and diversity are driven by our IDI Policy. This year, we have had the inclusion of 10 people with disabilities into our workforce, exceeding our target of a 10% increase over the previous year—with an actual growth of 42.86%. Our Human Resources department continues to identify qualified candidates and is actively working with temporary employment agencies to further promote the desired increase. We also provide workplace adaptations for people with reduced mobility, including stairlifts, access ramps and accessible restroom facilities.

📌 **S1-13**

Training and capacity building

At **TWG**, training is delivered through international workshops, online learning, and external courses, and is regarded as a key in talent development and employee engagement.

This year, we introduced our own e-learning platform, enabling us to develop tailored training programs in the area of regulatory compliance, complete with corresponding assessments. This initiative has brought several notable benefits, such as:

- **Personalised Learning:** We have been able to design specific content tailored to the needs and roles of each employee, ensuring that training is relevant and applicable to their daily work.

- **Efficient Assessments:** The assessments integrated into the platform allow us to measure employee progress and understanding immediately, identifying areas for improvement and ensuring that regulatory compliance standards are met.
- **Greater Reach:** Thanks to technology, we have been able to reach a larger number of employees, regardless of their geographical location, promoting a culture of regulatory compliance throughout the organisation.

The trainings are customized, depending on the position and the objectives of our company. Both the HR department and the managers of each area determine these needs on an annual basis and verify the effectiveness of each training in terms of these objectives. In addition, the HR area registers all training in the platform of Sustainability. By 2025, it is estimated that a capacity building program will be in place based on positions and responsibilities and will be led by **TWG's** VP Y CHRO, as required by the CSRD.

One of the objectives set for the year 2024 was to increase training by 10% with respect to the previous period. We have exceeded this objective, having increased training by 26.07%. **TWG** has invested a total of 152,110.50 during the year 2024, of which 47.98% was subsidized.

Below is a detailed comparison of hours by professional category and the corresponding investment and by subject matter for the company's own staff:

*IDI: Inclusion, Diversity and Equal Opportunity Policy

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

Total number of training hours by Professional Category	YEAR 2024	YEAR 2023	YoY change 2024-2023	% YoY change 2024-2023	YEAR 2022	Difference Year 2024-2022
Executives and Managers	2.984	3.634	-650	-18%	1.453	1.531
Middle Management and Qualified Technicians	3.918	3.687	231	6%	1.777	2.141
Administrative	6.080	5.351	729	14%	2.007	4.073
Operators	15.088	9.594	5.494	57%	2.651	12.438
Total	28.070	22.266	5.804	26%	7.887	20.183
Investment Local Currency	152.111 €	167.896 €	-15.786 €	-9%	142.626 €	9.485 €

Thematic	YEAR 2024			YEAR 2023		Difference Hours Year 2024 vs 2023	Difference Investment Year 2024 vs 2023
	Number of Hours	Investment in Euros	% of total hours	Number of Hours	Investment in Euros		
Quality	1.386	€ 18.386,66	5%			1.386	€ 18.386,66
Cybersecurity	347	€ -	1%			347	€ -
Compliance (Code of Ethics)	207	€ 2.554,54	1%	803	€ 15.960,81	-596	-€ 13.406,27
Culture	55	€ 1.820,97	0%			55	€ 1.820,97
Environment	670	€ 3.622,72	2%	14.668	€ 72.003,81	-13.998	-€ 68.381,09
Health and Safety	4.555	€ 18.505,99	16%	2.619	€ 13.472,74	1.936	€ 5.033,25
Language	4.057	€ 54.358,53	14%	4.176	€ 66.458,91	-120	-€ 12.100,38
Onboarding	401	€ -	1%			401	€ -
Technique	16.394	€ 52.861,09	58%			16.394	€ 52.861,09
Total	28.070	€ 152.110,50	100%	22.266	€ 167.896,27	5.804	-€ 15.785,77

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

As part of **TWG's** ongoing concerns in skills development, we have launched the TW OES (Operational Excellence System) pilot initiative in 2 of our warehouses in Cabanillas and Pamplona that combines HR best practices and operational efficiency. It is our system to operate with precision, efficiency and adaptability, following the purpose of excellence that drives this company organization. Based on four drivers: efficiency, performance and achievement control, standardization and continuous improvement, this system has proven to be innovative. The results obtained are promising, and with a holistic approach involving the areas of HR, Communication, Quality and Warehousing, with the approval and follow-up of the Board of Directors (CA), there are already plans to scale this project to new warehouses.

We also believe it is important to highlight that the temporary personnel have also received intense training during 2024, as shown in the table below, which corresponds to 46.67% of **TWG's** total training. Given that temporary staff is essential to cover the peaks of demand typical of our activity, promoting their training becomes a strategic decision. This training allows them to adapt quickly and to be more versatile in their functions, which increases their satisfaction and reduces turnover. It also facilitates their transition to the permanent workforce, enabling them to take on long-term responsibilities and contributing to cost reduction.

Training Subject	Number of Hours
Code of Ethics	2
Culture	1
Environment	1
Health and Safety	6397
Onboarding	806
Quality	40
Technique	5856
Total	13102

Health and safety of our workforce²⁰

Providing a safe and healthy work environment is a priority as it is a relevant issue, which is valued by our Stakeholders. This is the central objective of our Environmental, Quality and Health and Safety Policy is to **TWG**.

TWL and **TWA's** Health and Safety managers and HR areas ensure that all employees receive appropriate training in health risks, from the moment of incorporation and record this information in the internal sustainability platform.

All employees are covered by the occupational health and safety management system at their respective locations and **TWG** is ISO 45001:2018 Certified.

In both Spain and Portugal, **TWG** has an external prevention service that assesses and detects the exposure to risks inherent to each job position and establishes proposals for continuous improvement. In Spain, Mexico and France, there are Health Committees that review risks and propose improvement measures, which are recorded in the corresponding minutes.

The Health and Safety at Work managers report the management indicators to the Sustainability Director and the Sustainability Committee on a bimonthly basis, updating the improvement initiatives.

Affiliated companies declare that they have had no occupational accidents or illnesses during the year 2024.

No occupational diseases have been reported in **TWG** during the year 2024.

20 Methodology for calculating the indicators: Frequency Index (FI)= (number of accidents with sick leave*1 million)/hours worked (Total number of hours of absenteeism/total number of hours worked) * 100 - Severity Index= (calendar days lost per accident, starting from the first day of sick leave/hours worked) * 1000/absenteeism index - Absenteeism rate: Total days of absenteeism/Total working days*100

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Due to our commitment to provide reliable and verifiable data, and because during 2024 we are dedicated to adjusting our internal systems in the Sustainability platform we developed, the severity and frequency rates, as well as the reported absenteeism rate are only those provided by the Mutual for Spain. This approach allows us to guarantee the accuracy and completeness of the data. To ensure the comparability of these data with those of previous and future years, we will include them in the 2025 EINF.

Occupational accidents	YEAR 2024		YEAR 2023		Difference Year 2024 vs Year 2023	
	Women	Men	Women	Men	Women	Men
Number of occupational accidents WITH SICK LEAVE	9	35	16	54	-7	-19
Number of occupational accidents WITHOUT LEAVE	21	51	30	81	-9	-30
Industrial Accident Severity Rate	0,50	1,49	0,11	0,75	0,39	0,74
Frequency Index of Workplace Accidents	38,46	45,53	13,92	26,70	24,54	18,83

Indice de gravedad Accidentes Laborales e Indice de Frecuencia para España suministrado por la Mutua

El año 2023 no se habían incluidos los datos de Número de Accidentes de TEA.

Enfermedades Profesionales	YEAR 2024		YEAR 2023		YEAR 2022	
	Women	Men	Women	Men	Women	Men
Number of Occupational Diseases	-	-	-	-	2	1
Severity Index Occupational Diseases	-	-	-	-	84	60
Occupational Disease Frequency Rate	-	-	-	-	1	1

Severity Index of Occupational Illnesses and Frequency Index for Spain provided by the Mutual Insurance Company.

Absenteeism TWG²¹: 4.58

21 Data supplied by the Mutual in Spain

During the year 2025, **TWL**'s Health and Safety Manager will carry out actions and initiatives in accordance with the adherence to the Luxembourg Declaration, committing ourselves to implement the basic principles of action in the reference framework of a good management of workers' health in the company established by the European Network for the Promotion of Health at Work. It will be developed in 4 stages: Diagnosis, Design and Development, Verification and Implementation. It will start in one of the warehouses and the model will be replicated to the rest in Spain during the year 2025.



We have 5 Occupational Health and Safety Committees (3 in **TWA** Mexico, 1 in Portugal and 1 in **TWL** Spain), which deal with risk assessments, improvement measures and such actions are duly recorded in the respective minutes.

On the other hand, we have conducted a total of 4554.82 hours of training in this area. While last year 2619 hours were given for a total of 1339 employees (1.96 hour per employee), this rate has improved reaching 2.60 hours. This difference is justified by the implementation of more efficient training methods, which has influenced this reduction in the time required to cover the same content.

Therefore, in addition to counting training hours, we have begun to measure the topics covered in training and the number of employees trained. This new methodology will allow us to further optimize our training efforts, ensuring that they are more effective and aligned with our needs, because by measuring training topics, we can identify areas of knowledge that require greater attention and adjust our training programs accordingly. In addition, knowing the number of employees trained in each subject helps us to assess the impact of our training initiatives and to determine their effectiveness.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

During the year 2024, a total of 973 health examinations were performed, which represents an increase of 156.73% vs. the previous year.

Occupational health and safety is a top priority for **TWG**. In order to continuously improve our practices and ensure a safe work environment, we have implemented three initiatives as detailed below:

- Conducted at our plant in Pilsting, Germany, in conjunction with the health insurance company. Through this collaboration, 64 employees received training on various topics, such as: Health at work to identify critical areas and the importance of exercise during breaks, lower back pain checks, running training, quick measurement of heart rate at rest, determination of maximum oxygen uptake (VO2 max), evaluation, interpretation and personal advice, including specific recommendations and exercises to improve working habits.
- At our logistics hub in Cabanillas (Spain), we have developed our own innovative platform that includes a questionnaire for reporting any type of incident detected by workers on the premises. This questionnaire allows employees to report incidents, specifying who detected them, the location and a brief description. It is also possible to attach photographs or images to provide further details. The platform is designed so that authorised users can access the incidents reported and record the actions taken to resolve them. This initiative not only facilitates communication and problem solving, but also promotes a culture of safety and shared responsibility among all employees.
- At our three plants in **Mexico**²² we have carried out a breast cancer awareness programme among our female employees, which is key to promoting prevention and early diagnosis. Through the workshop, they will receive vital information on self-examination, risk factors and healthy habits. This initiative reinforces our commitment to their well-being and creates a more informed and supportive work environment.



(Germany) on June 6, 2024.



22 High incidence rate= 27.64 per 100 thousand inhabitants.

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

➤ **ESRS 2 – SBM-3**

➤ **S1**

Material impacts, risks and opportunities and their interaction with the strategy and business model.

Our double materiality assessment identified a potential risk in warehouse operations related to physical damage. The safety risk from chemical overheating, leaks, explosions and the use of complex machinery in assembly. Upon detection of these risks, **TWG** implements specific health and safety measures as explained in **S1-4**, minimizing this risk as much as possible..

➤ **S1-5**

Objectives related to managing material negative impacts, promoting positive impacts and managing material risks and opportunities.

In addition to training on hazardous materials, chemical assessments in the workplace, ISO 45001:2018 certification and our goal of zero serious injuries, it is important to mention that we have not had any serious injury incidents in 2024.

➤ **S1-15**

Work-life balance

Our Digital Disconnection Policy will be drawn up and submitted for review to the CCN and CA for approval in 2025. Once approved, the policy will be implemented through the appropriate internal procedures, led by the Human Resources department in collaboration with local management teams. This deployment will include both formal training and integration into existing protocols. We continue to promote digital disconnection through automated email messaging, as well as through our Welcome Manual and Equality Plans.

At present, 20 **TWG** employees across senior management, middle management, technical, and administrative roles benefit from flexible working hours, while seven employees work remotely or online. This measure has been introduced to support a healthier work-life balance, allowing employees to better manage their personal and professional responsibilities while enhancing overall job satisfaction.

The table below shows the number of employees who have taken family leave by country:

Country	Men	Women	Total	% of Total of the staff
Spain	5	2	7	0,40%
USA	0	0	0	0,00%
Mexico	1	1	2	0,11%
UK	0	0	0	0,00%
France	2	1	3	0,17%
Germany	0	0	0	0,00%
Portugal	1	1	2	0,11%
Sweden	0	0	0	0,00%
Total	9	5	14	0,80%

About this Report

01. Our Commitments to Sustainability
02. Aspects Y2024 Sustainability Management Highlights
03. Our Sustainability Commitments
04. Disclosures ESRS 2 general information Basis for preparation
05. Governance of the Sustainability
06. Our Strategy and Business Model
07. Our Stakeholders
08. Materiality - Assessment Process
09. Environmental Reporting ESRS E1 & E2
10. Social Reporting ESRS S1, S2 Y S3
11. Business Conduct ESRS G1
12. Financial Reporting



↘ S1-17

Incidents, complaints and serious incidences related to Human Rights

During 2024, no incidents of discrimination related to work were reported to HR or through the ethics communication channel on the grounds of gender, racial or ethnic origin, nationality, religion or beliefs, disability, age, sexual orientation or other relevant forms of discrimination and/or external stakeholders in all operations during the reporting period.

This includes incidents of harassment as a specific form of discrimination.

During 2024, no human rights incidents (e.g., forced labour, human trafficking or child labour) were identified.

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

ESRS DR	DATA POINT/METRICS	ACCOUNTING POLICY
S1-6	Total number of employees	Employee data are recognized based on the records of the Group's HR system. The data represents the status at year-end (12.31.2024).
S1-6	Number and rate of personnel turnover	The number of employees who left TWG during the year includes employees who left due to voluntary severance or dismissal segregated by gender and age range. The employee turnover rate is calculated as the number of employees who have left the company within the reporting year divided by the total number of employees in the year or on average.
S1-6	Full-time employee	A full-time employee is an employee whose working hours per week, month or year are defined in accordance with national working time legislation and practice.
S1-6	Part-time employee	A part-time employee is an employee whose hours of work per week, month or year are less than "full-time" as defined above.
S1-6	Number of new hires	Number of new employees on staff during 2024
S1-6	Rotation	Number of people promoted with upgrades during the year 2024.
S1-8	Collective bargaining coverage	Corresponds to the number of employees covered by collective bargaining agreements divided by the number of employees x 100.
S1-8	Social dialogue	Corresponds to the number of employees working in locations with workers' representatives divided by the number of employees x 100.
S1-9	Women in senior management	Proportion of women in decision-making positions. This is defined as women in the categories of Board of Directors, Directors and Managers, and qualified middle managers and technicians.
S1-9	Age distribution	Calculations include all employees (full-time and part-time employees) and data are provided on a headcount basis.
S1-16	Wage gap	The wage gap calculation was calculated by taking the average gross salary level of male employees minus the average gross salary level of female employees divided by the average gross salary level of male employees.
S1-11	Social protection	Social protection refers to all measures that provide access to health care and income support in cases of difficult life events, such as loss of a job, illness and need for medical care, childbirth and raising a child, or retirement and need for a pension.
S1-13	Average number of training hours per employee	Total hours of training offered and completed by employees divided by the total number of TWG employees, calculated on a headcount basis.
S1-13	Number of employees who participated in training and number of courses completed	This is extracted from the TWG database, which collects HR information.
S1-14	Accident frequency rate	It was calculated taking into account (number of accidents with sick leave*1million)/hours worked (total number of absenteeism hours/total number of hours worked) x 100
S1-14	Accident severity rate	It has been calculated taking into account (calendar days lost due to accidents, starting from the first day of sick leave/hours worked)*1000/ Absenteeism rate
S1-14	Absenteeism rate	It has been counted taking into account (Total number of hours of absences/total number of hours worked) x 100
S1-15	Family leave	Family-related leave includes maternity, paternity, parental and caregiver leave available to employees under TWG policies, national laws and/or collective bargaining agreements.
S1-16	Annual compensation ratio	Calculated by taking the annual total compensation for the highest paid person in the company divided by the annual total compensation of the median employee excluding the highest paid person.
S1-17	Number of claims	This is the total number of complaints filed through TWG's ethical communication channel. This mechanism is available to all interested parties.

**Specific notes
on NEIS S1**

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

WORKERS IN THE VALUE CHAIN

📌 **ESRS 2 – SBM-3**

📌 **S2**

Material impacts, risks and opportunities and their interaction with the strategy and business model.

TWG relies on business partners and suppliers throughout its value chain to manage and transport goods. This has implications for and affects subcontractors/drivers providing ground transportation services.

The materiality assessment identified **TWG**'s material impacts on workers in its value chain, therefore focusing on safety impacts for workers providing these services. Drivers and workers employed by our transportation partners to transport goods face increased safety risks when operating vehicles. Health and safety incidents can result in a range of negative consequences. To address these impacts and prevent harm to workers in our value chain, **TWG** has policies and procedures in place to ensure that its business partners maintain high safety standards as explained below.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

📌 **S2-1**

Policies related to workers in the value chain

Our Supplier Code of Ethics (SCE) sets **TWG**'s standards for ensuring worker safety throughout our value chain. We expect suppliers to prioritize health and safety in line with applicable regulations and provide employees with safe working environments to prevent accidents, injuries and work-related illnesses. Further details on the Supplier Code of Ethics (SCE), including how it is monitored and implemented, are described in **G1-1**.

📌 **S2-2**

Processes for interacting with value chain workers

At the moment, **TWG** does not have specific processes for communication with suppliers' employees, except that we offer them communication through **TWG**'s ethical communication channel, where we have not received any complaints or denunciations.

📌 **S2-3**

Processes for remediating negative impacts and channels for value chain workers to raise their concerns

All stakeholders, including workers in the value chain, can raise concerns about irregularities through our ethics communication channel detailed in section **G1-1**.

📌 **S2-4**

Measures on material impacts on workers in the value chain, and approaches to manage risks and seek opportunities related to workers in the value chain, and the effectiveness of those actions.

When selecting suppliers, the Purchasing department considers the health and safety measures in place for their own employees, as well as any relevant management certifications or reported claims. Following this review, suppliers are categorized by type and assessed through a purchasing risk matrix. Prior to formal engagement, they are required to adhere to our Supplier Code of Ethics (SCE). In 2025, the CSO (Chief Sustainability Officer) will conduct supplier sustainability compliance assessments, and audits will be initiated accordingly. These results will be reviewed by both the CSOs and the Legal department, and corrective measures will be taken with any suppliers found to be non-compliant with the required standards.

In addition, we have a Driver's Manual that is provided to all transportation contractors. Its main objective is to guarantee the safety, quality and efficiency, as well as the safety and security of our products in the reception, storage, preparation and logistics processes. Aware of the importance of the health and safety of carriers, **TWG** promotes awareness of internal and external hazards and risks, establishing effective and measurable action plans. The manual includes detailed instructions on:

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

- Correct loading and unloading
- Compliance with our Integrated Environmental, Occupational Health and Safety and Quality Policies.
- Safety guidelines, fraud prevention and food safety culture
- Requirements and responsibilities for the good condition of vehicles
- Action in accidents and steps to be taken in the event of accidents
- Specific rules for safe transport
- Identification of hazards, safety measures, fatigue and occupational diseases
- Defensive driving as a technique to prevent accidents and improve safety

S2-5

Goals related to managing material negative impacts, promoting positive impacts, and managing material risks and opportunities.

During 2025 and in light of the results of supplier sustainability compliance assessments, the CSOS will determine goals and objectives for the improvement of health and safety in **TWG's** supply chain.



AFFECTED GROUPS

📌 **ESRS 2 – SBM-3**

During the last year, **TWG** has deepened its strategy of **GROWING WITH PURPOSE**, that is, generating a greater positive impact in the communities where it operates. This includes collaborating in natural disasters, facilitating the transportation of vital resources and equipment, as occurred in Valencia in 2024, as well as through its partnerships with different NGOs in the sites where we operate that contribute to sustainable development and the work of its **TWG** Foundation. Although its relative importance in this exercise has not been determined, **TWG**'s contribution in this area is transcendental and demonstrates once again its commitment to people and the planet.

📌 **S3-1**

Policies related to affected communities

TWG has a CSR Policy (CSRP) to reinforce our commitment to human rights and the environment, as well as to ethical and responsible business conduct. Our Code of Ethics and our Human Rights Policy are the basis on which all other policies and procedures are deployed.

📌 **S3-2**

In 2024, Valencia was severely affected by a Mediterranean weather phenomenon (DANA), impacting approximately 845,000 people. The damage was classified as severe to extreme, due to the tragic loss of life, widespread impact on urban areas, and the serious consequences for housing, infrastructure, and essential services—all of which significantly disrupted the local economy.

TWG responded swiftly and with a strong sense of commitment. We joined the admirable initiative led by the Navarre-based construction company VDR, which mobilized an extraordinary convoy of nine trucks carrying nearly 90 tons of machinery, food, and essential supplies to support the affected areas. As a partner in this effort, we provided our expertise and resources to ensure that this mission reached those most in need.



About this
Report

01.
Our Commitments to
Sustainability

02.
Aspects Y2024
Sustainability
Management
Highlights

03.
Our Sustainability
Commitments

04.
Disclosures ESRS 2
general information
Basis for preparation

05.
Governance
of the Sustainability

06.
Our Strategy and
Business Model

07.
Our
Stakeholders

08.
Materiality -
Assessment Process

09.
Environmental
Reporting
ESRS E1 & E2

10.
Social Reporting
ESRS S1, S2 Y S3

11.
Business Conduct
ESRS G1

12.
Financial Reporting



In addition, **TWG** is part of different initiatives in which our vice-president actively participates, among which we would like to mention:

- **Impulso Emprendedor CEIN²³**: This is a public-private collaboration program with companies in Navarra, now in its 12th edition, which helps entrepreneurs to give them visibility, support and specialized advice.
- **Space 30²⁴**: This is an initiative of companies and business foundations. whose objective is to promote the strategic and cultural transformation of sustainability in organizations through the visibility and exemplification of good practices and which promotes partnerships. It is a reference application for organizations in the field of sustainability that serves as a tool for example to SMEs in this management. **TWG** actively participates in this space to promote sustainability through the communication of its initiatives, with more than 30 participating entities.

²³ <https://impulsoemprendedor.cein.es/>

²⁴ <https://app.espacio30.com/>



In the second consecutive year since its creation, **la Fundación TW Foundation (TWF)²⁵**, to promote culture through different projects, among which we would like to highlight:

- Editorial: Collection “**INDOMABLES**”: Creation of stories for children and adults based on experiences and moments of the biography of reference characters in Navarra throughout history. The objective is to promote the critical spirit and universal values such as respect, loyalty, freedom (associated with knowledge), courage, honor, honesty. This collection is based on inspiring people who had the restlessness to delve deeper into things, the ingenuity to discover treasures in the everyday and the courage to promote critical thinking. Jerónimo de Avanz (our first title): poet, musician, cosmographer and inventor, who patented and used the steam engine 100 years before the industrial revolution.

²⁵ <https://tw-group.com/fundacion/>

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting



• “NAVARRA, TIME AND SPACE”

Sponsorship of the political and sociological essay on the foral community from protohistory to the present day, edited and coordinated by Víctor Manuel Arbeloa and Luis Landa.

With this sponsorship, TWF strengthens its mission to support cultural and educational projects that enrich the intellectual heritage of Navarra, consolidating its role as a reference in the promotion of values that transcend generations. The President of the TWF, Miguel Sanz, emphasized the entity’s continued commitment to projects that promote knowledge: “Sponsoring this type of project reinforces our commitment to culture and knowledge, because we understand that a society with solid roots grows stronger”.



On the other hand, the short film “(R)ojo por (r)ojo” supported by TWF during the past year, with the aim of supporting the emerging talent of the University of Navarra and a narrative that connects with the everyday, has been selected to be part of the catalog of short films of the second edition of ‘Navarra Shortzinema’, an initiative that seeks to give visibility and international projection to Navarre productions and that highlights our commitment to the emerging talent of the University of Navarra.

This initiative highlights the short film’s diversity of genres and themes, as well as the community participation and the feminine approach in the direction. Inclusion in this catalog has facilitated its presentation at festivals, fairs and important markets in the sector, broadening its scope by obtaining the following recognitions:

- Best Short Film from Navarre at the Murchante International Film Festival.
- Best Fiction Short Film in the Torre vieja Audiovisual contest.
- Audience Award and 2nd Best Fiction Short Film at the Socine Festival.
- Audience Award for Best Short Film. Santaella Short Film Contest - Imagenarte.
- Audience Award - Best of the section “La cámara ibérica”. Festival Cuenca del Salado International Short Film Festival.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

- Honorable Mention. International Film Festival Light to the world.
- Special Jury Mention. Arouca Film Festival.
- Best International Fiction Short Film. FENACIES Student Film Festival.
- Award to the Best Short Film from Navarre. Murchante Short Film Competition.

One of TWF’s first outstanding projects has been the publication of the book “**Juan de Palafox**²⁶. **Talent, passion and commitment**”, a work that pays tribute to an essential historical figure that unites two key cultures for **TWG**: Navarre and Puebla de los Ángeles, in Mexico. The book has been awarded the **Third Prize for Best Edited Books in 2023** in the category of Bibliophilia, granted by the Spanish Ministry of Culture.

This recognition values the aesthetic quality and craftsmanship of the edition, especially its parchment binding, made by the Cistercian nuns of the Royal Monastery of Santa Lucía in Zaragoza. The jury highlighted details such as the irregular edges, the hand-made headpieces and the hand-painted spine..²⁶



TWG CEO Carlos Llonis,, Virginia Michelena, our VP together with Ricardo Fernández Gracia who is the writer of the book and Miguel Sanz Sesma, president of TWF.

As part of our commitment, one of the levers for promoting sustainable development in the community is the collaboration with different NGOs such as Fundación Osasuna CF and the Children’s Gala against Cancer and the participation with companies in the sector such as the Navarre Chamber of Commerce, the Automotive Cluster Association, Asociación Clúster de Automoción, Asociación de Desarrollo Logístico, Asociación Progreso Dirección, Club de Marketing de Navarra, AECOC, AENET, ADEGI, FVET, AVIA, ADL, among many others, in which we share knowledge, expertise, innovation, and allow us to have a global vision of the challenges and risks of the activity.

Our CEO, Carlos Llonis, took part as a mentor in the Senior Mentoring Program at the Public University of Navarre (UPNA). In collaboration with the same institution, we are also engaged in a master’s program that is currently evaluating the case study on the implementation of our operations in Australia.

27

The following table shows **TWG**’s ISP²⁸ contributions during the year 2024:

PSI - Social Investment TWG	Amount in €
Donations to NGOs/Entities	7.750
Membership contributions Associations	5.004
Total investment to TWG Foundation	30.000
Total	42.754

This year, we welcomed students from the Auxiliary Warehouse Operations course run by the Spanish Red Cross in Navarre, hosting a presentation on our operations and a guided tour of our warehouse to showcase the day-to-day reality of our activity.

27 Table 18
28 PSI: Private Social Investment

26 https://tw-group.com/wp-content/uploads/2023/07/Palafox_FundacionTW.pdf

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

As part of the Red Cross “Corporate Social Challenge” Program, TWG reinforced our commitment to inclusion and social responsibility. Through this initiative, we support the employability of individuals invulnerable situations, promote a more diverse and inclusive work environment, and strengthen our culture as a company committed to making a positive social impact.

This year we also joined the “La Caixa” Foundation’s **Child Vaccination Program** as “Silver” sponsors, strengthening our commitment to children’s health.

In our commitment to talent and collaboration with educational institutions, it has been productive to participate once again in an event like **EAETalent24**, which brought together more than 125 companies in Madrid.

TWG’s commitment to the community is steadfast, fully aligned with culture, education, and health as strategic pillars of sustainable development.



CUSTOMERS AND END USERS

ESRS 2 – SBM-3

TWG considers its customers as strategic partners essential to mutual success. It deeply values their needs and works tirelessly to provide customized and efficient solutions. The positive impacts generated by this company include optimization of the supply chain, reduction of operating costs, and improvement in the timeliness of deliveries. Our value contribution is enhanced by our proximity to our customers to our customers, leveraged by experience and know-how and the SAFETY and QUALITY, strengthened by value INNOVATION. This real positive impact is in our own operations, affects our customers and their stakeholders and occurs in the short, medium and long term. Our customers trust **TWG** to handle their data and ensuring the confidentiality, integrity and availability of their data is vital to maintain their trust and compliance with relevant regulations. Any breach or incident cybersecurity breach could result in a violation of customer rights, generating reputational damage leading to the loss of current or potential customers, and possible fines or sanctions, and this is a risk that would affect our own operations, in the medium and long term.

S4

Material impacts, risks and opportunities and their interaction with the strategy and business model.

At **TWG**, we work with customers to help them maximize their impact on people and the environment. This real positive impact is in our own operations, affects our customers and their stakeholders and occurs in the short, medium and long term. This value creation is driven by SAFETY and QUALITY.

Safety is ensured in all our operations by subjecting our processes to the highest standards, making a positive impact. The warehouse of Pamplona is ISO 22000 certified (food safety) and IFS (International Featured Standards) is a globally recognized quality standard that guarantees not only quality but also safety in the logistics of food and non-food products.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

SECURITY

Information System	Activity	Advantages
MES (Manufacturing Execution System)	TWA	1. Real-time monitoring: Allows to quickly detect and respond to any safety problem in the plant, minimizing risks and downtime.
		2. Traceability: Facilitates the tracking of each step of the production process, which helps to quickly identify and correct any failure or safety incident.
		3. Quality control: By integrating quality management into the production process, it ensures that defects are detected and corrected early, reducing the risk of defective products that can cause safety problems.
		4. Process automation: Reduces manual intervention, thus reducing the risk of human error that could compromise safety.

These standards require continuous monitoring and are evidence of our highest commitment to safety. **TWL** is also **IFS Logistics** certified for the storage, transportation and distribution, loading and unloading of frozen foods.

SECURITY

Information System	Activity	Advantages
FSR COVER (Facility Security Requirements)	TWL	1. Meeting customer requirements: Helps companies meet the expectations and demands of their customers in terms of security
		2. Business market expansion: Facilitates entry into new markets by demonstrating a high level of security in the supply chain.
		3. Reduced risk of theft or loss: Significantly reduces the risk of theft or loss of goods during storage and transit.
		4. Industry recognition: Enhances the company's reputation and brand image by being recognized for meeting high safety standards.
		5. Increased customer confidence: Increases customer confidence in the company's ability to protect its products.
		6. Quality Assurance: Ensures that safety processes are consistent and of high quality.

About this Report




















- 01. Our Commitments to Sustainability
- 02. Aspects Y2024 Sustainability Management Highlights
- 03. Our Sustainability Commitments
- 04. Disclosures ESRS 2 general information Basis for preparation
- 05. Governance of the Sustainability
- 06. Our Strategy and Business Model
- 07. Our Stakeholders
- 08. Materiality - Assessment Process
- 09. Environmental Reporting ESRS E1 & E2
- 10. Social Reporting ESRS S1, S2 Y S3
- 11. Business Conduct ESRS G1
- 12. Financial Reporting



At **TWL** France (Survilliers), we are taking a step forward in our ability to adapt and customise logistics solutions with the creation of our first cold storage room during the last months of 2024.

QUALITY is our hallmark and is driven by INNOVATION, adding value for our customers. **TWA**'s five plants, as well as the automotive component assembly activity carried out at **TWL**'s Vitoria plant, are certified to the IATF 16949 standard.

At **TWA**, our customers produce monthly reports on their own systems, which they share with us. During 2024, we maintained an A rating with all our customers, demonstrating once again that we are one of their most valuable and reliable suppliers, with a high level of performance.

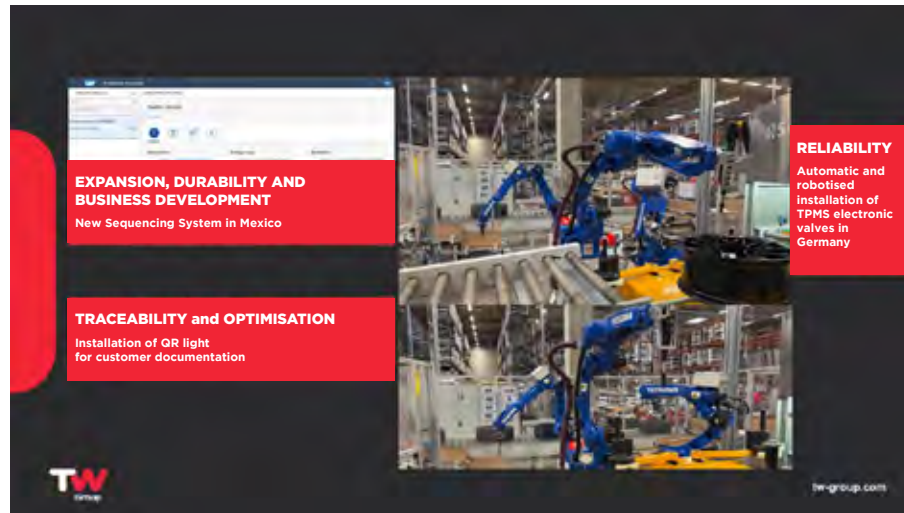
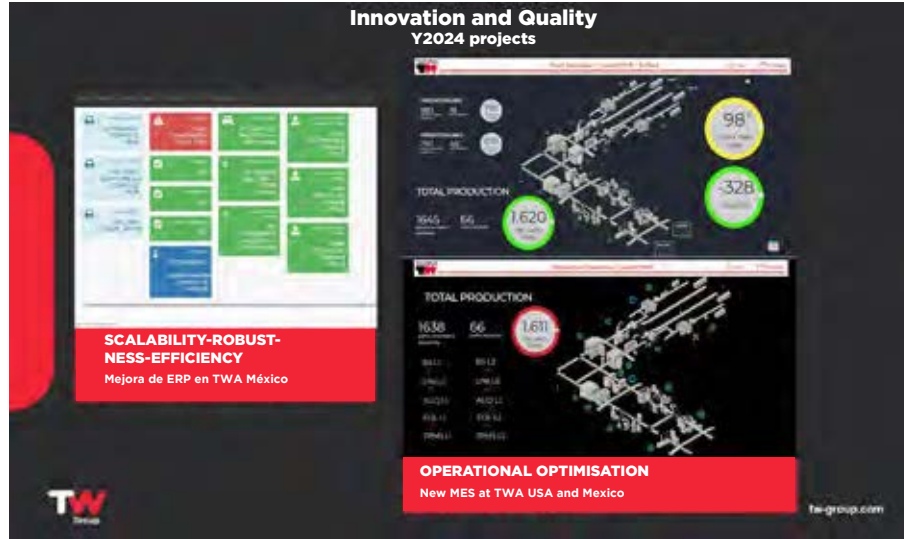
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Área	2024								
General Performance	4,9/5								
Quality performance									

We have achieved an average annual evaluation of 99/100%, an increase of 3.9% over the previous year. We received 5 complaints, all of which were resolved (3 less than the previous year).

Our initiatives underscore a comprehensive approach to the continuous improvement of our processes.

About this Report

01. Our Commitments to Sustainability
02. Aspects Y2024 Sustainability Management Highlights
03. Our Sustainability Commitments
04. Disclosures ESRS 2 general information Basis for preparation
05. Governance of the Sustainability
06. Our Strategy and Business Model
07. Our Stakeholders
08. Materiality - Assessment Process
09. Environmental Reporting ESRS E1 & E2
10. Social Reporting ESRS S1, S2 Y S3
11. Business Conduct ESRS G1
12. Financial Reporting



Each initiative is designed to optimize specific processes, reducing time, improving traceability and increasing the reliability of operations, increasing efficiency and reducing the use of resources, both human and technological, optimizing performance and memory utilization. A common goal is to ensure scalability and business growth, allowing solutions to be used in the most efficient way possible.

The solutions are designed to adapt to future needs and support long-term growth, improve information traceability and reduce the possibility of human error, ensuring more rigorous quality control. These solutions integrate with existing management systems, facilitating their implementation and ongoing use, and ensuring a smooth and efficient transition.

- Implementation of new ERP development in Mexico, replacing the previous system for one of the plants in Mexico.
- Implementation and development of a new sequencing system.

Both initiatives will be replicated in the rest of the plants over the next two years.

- New MES system in Mexico and USA plant
- Automatic and robotized installation of TPMS electronic valves at a plant in Germany.
- Installation of QR light, allowing better traceability of all necessary documentation for the customer.

About this Report

- 01.** Our Commitments to Sustainability
- 02.** Aspects Y2024 Sustainability Management Highlights
- 03.** Our Sustainability Commitments
- 04.** Disclosures ESRS 2 general information Basis for preparation
- 05.** Governance of the Sustainability
- 06.** Our Strategy and Business Model
- 07.** Our Stakeholders
- 08.** Materiality - Assessment Process
- 09.** Environmental Reporting ESRS E1 & E2
- 10.** Social Reporting ESRS S1, S2 Y S3
- 11.** Business Conduct ESRS G1
- 12.** Financial Reporting



At **TWL**, **innovation** is present in our logistics solutions

New Warehouse in Illescas:

Following our commitment to offer customized logistics projects, we inaugurated a new warehouse in Illescas (Toledo). This facility, designed to meet the needs of large supermarkets and the retail sector, is equipped with the latest technology and optimized processes to guarantee efficiency and precision in every operation.



Outstanding features of our new center:

- 15.000 m² of storage space adapted to the needs of our customers.
- Capacity to handle up to 18,000 pallets.
- Advanced technology and **Lean Management** processes, focused on continuous improvement.
- Integral services:
 - Storage
 - Order preparation
 - Customized distribution

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

QUALITY AND INNOVATION - TWO CONCEPTS UNITED - MULTIPLE IMPACTS

At **TWL** we have a comprehensive approach to the modernization and continuous improvement of our operational processes, as all solutions are integrated with existing management systems, facilitating their implementation and continuous use, leveraging advanced technologies such as drones, artificial intelligence, predictive systems and data analysis platforms. Each innovation is designed to optimize specific processes, whether in inventory management, replenishment, operational productivity, transportation documentation or delivery routes. The common goal is to increase efficiency and reduce the use of resources, both human and machine, minimize operating costs, improve information traceability and reduce the possibility of human error, as well as reduce CO₂ emissions.

- Inventory with Drones: Implementation of drones for counting full pallets at height, integrating the information into the Warehouse Management System in real time.
- Warehouse Replenishment Optimization System: Development of a predictive system based on the analysis of consumption by reference and product family. This system innovatively suggests the optimal locations and necessary replenishments, using parameters such as ABC consumption, shelf life, stock level, proximity to the dock area and picking intensity.
- Warehouse Productivity Scorecards: Creating Advanced Qlik Cloud dashboards and scorecards to analyze operator productivity. This innovative tool allows cross-analysis of all PDA reading items, improving operational efficiency in warehouses.
- Implementation of eCMR in the Transportation Management System: digitizing documentation and improving traceability. This innovation reduces errors, increases the efficiency of the signing process, saves time and costs, and optimizes the documentation of the merchandise.

- Route Optimisation / Emissions Reduction: Integration of the Transport Management System with a Route Optimisation System to calculate the best routes. This innovative solution minimises costs by reducing vehicles and kilometres, and contributes to reducing CO₂ emissions.
- Implementation of Artificial Intelligence Tools in the Microsoft 365 Ecosystem: This innovation leverages advanced AI capabilities to improve efficiency and effectiveness in the workplace.

TWL is currently ISO 9001 certified in 25 of its warehouses At **TWL**, as part of our commitment to customer satisfaction, we invite our customers to complete an annual survey via the following link:



<https://forms.office.com/Pages/AnalysisPage.aspx?AnalyzerToken=COpxgXggO2HOluBuPDkU9CmcH4etjk4N&id=Hj-fYfrdNkyt3IA8IldF8Uz2URkOjFtCI9Rcs4-voRVUMVcwUzZCSOpLMzhEQzROUOk4RVg5NU9XRC4u>

During the year 2024, average annual evaluation from customers who responded to this survey was 4.2/5. We will continue to promote its use during 2025. Each **TWL** KAM (Project Manager) verifies that these complaints have been resolved and a weekly general evaluation meeting is held to report on the results of their status. Assessing more customers will enable us to identify areas for improvement and strengthen our practices, which is crucial for customer loyalty and retention. By extending the assessment to a larger percentage of our turnover, we can ensure that our quality practices meet the expectations of a broader customer base.

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

In conclusion, this commitment not only reinforces our dedication to quality, but also strengthens our ability to meet the needs and expectations of our clients—fostering sustainable growth and enhancing customer satisfaction.

Innovation allows us to adapt to the changing needs and expectations of our customers and to offer services that enable us to exceed their quality standards. It translates into the optimization and improvement of our processes, positively impacting our own activity and that of our customers.

Customer Data Protection

In relation to risk and risk management, our clients rely on us to handle their data. Ensuring the confidentiality, integrity and availability of this data is vital to maintain their trust and compliance with relevant regulations.

Our software processes sensitive information, any data leaks, breaches or cyber security incidents could result in a breach of customer rights. Should this materialize, it could have financial repercussions.

This includes reputational damage that could lead to the loss of current or potential customers, and possible fines or penalties.

This risk is in our own operations and to mitigate it one of the most important activities is to ensure that employees are trained in cybersecurity and proper data handling.

📌 S4-2 y S4-3

Processes for remediating negative impacts and channels for customers to raise concerns

Our customers and their stakeholders are encouraged to raise concerns about possible irregularities through our ethical communication channel. The business areas, as well as the sustainability director hold regular meetings with customers to facilitate direct

and open communication, receive constant feedback, strengthen the relationship and communication, and value their opinions and concerns. More information can be found in section **G-1**. As part of this, the DPO maintains a risk register, which includes a mitigation plan..

📌 S4-1

Customer-related policies

TWG's relationships are grounded in a foundation of ethical understanding, as further detailed in section **G1-1**.

Given the material importance of this matter, TWG has implemented a Data Protection Policy approved by the Board of Directors (CA). The purpose of this policy is to safeguard the fundamental rights and freedoms of all individuals who engage with TWG, ensuring that their right to privacy and personal dignity is upheld in the processing of their personal data.

The policy defines the internal procedures required to meet applicable legal requirements in each jurisdiction, in line with the principles of accuracy, storage limitation, security and proactive accountability. In Spain, TWG has appointed an external Data Protection Officer (DPO), who performs the duties defined under Regulation (EU) 2016/679 of the European Parliament and of the Council, and oversees compliance with these guiding principles.

The policy requires the registration of all processing activities and the regular assessment of data-related risks to determine the appropriate safeguards for ensuring full legal compliance. In other jurisdictions, TWG works closely with local law firms and its internal Legal department to ensure adherence to the respective national data protection regulations.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

📌 **S4-4**

Adoption of measures related to material customer impacts

As explained in section **S1-4**, , a specific procedure is in place. We include more detail below:

TWG’s Client Data Protection Procedure

- Contract Review: The Legal area reviews contracts and notifies the IT area in accordance with the Data Protection Policy about the data to be disposed of on behalf of the Client.
- Notification to IT: IT receives the notification and proceeds to inform the IT Delegate. Data Protection (DPO) and the Cybersecurity area.
- Impact Assessment and Logging of Activities: The DPO performs an impact assessment and maintains a log of data processing activities.
- Verification of Control Measures: The Cybersecurity area verifies that **TWG’s** infrastructure has the necessary control measures for data protection.
- Incident Response Protocol: Both the DPO and the Cybersecurity area have an established protocol for managing security incidents.

📌 **S4-5**

Goals related to the management of material adverse events

In 2025, we will continue to improve our risk management approach and determine targets to improve business resilience.

The Regulatory Compliance Committee (CCN) will proceed with the review of the internal procedures and risk matrix, the corresponding impact assessment together with the Activity Log provided by the DPO and will notify the Board of Directors for its control. **TWG’s** legal area will continue to ensure that the notification to the CTO| CISO is complied with in order to provide the CISO with the necessary infrastructure for data security, as well as determine the measures and actions required and necessary together with the IT and Cybersecurity area for the prevention, mitigation and remediation of negative incidents of relative importance in this area, and monitor the effectiveness of the actions for the fulfillment of the objective. There were no incidents of customer privacy data breaches during the year.

11

Governance Information ESRS G1

About this Report

- 01.** Our Commitments to Sustainability
- 02.** Aspects Y2024 Sustainability Management Highlights
- 03.** Our Sustainability Commitments
- 04.** Disclosures ESRS 2 general information Basis for preparation
- 05.** Governance of the Sustainability
- 06.** Our Strategy and Business Model
- 07.** Our Stakeholders
- 08.** Materiality - Assessment Process
- 09.** Environmental Reporting ESRS E1 & E2
- 10.** Social Reporting ESRS S1, S2 Y S3
- 11.** **Business Conduct ESRS G1**
- 12.** Financial Reporting

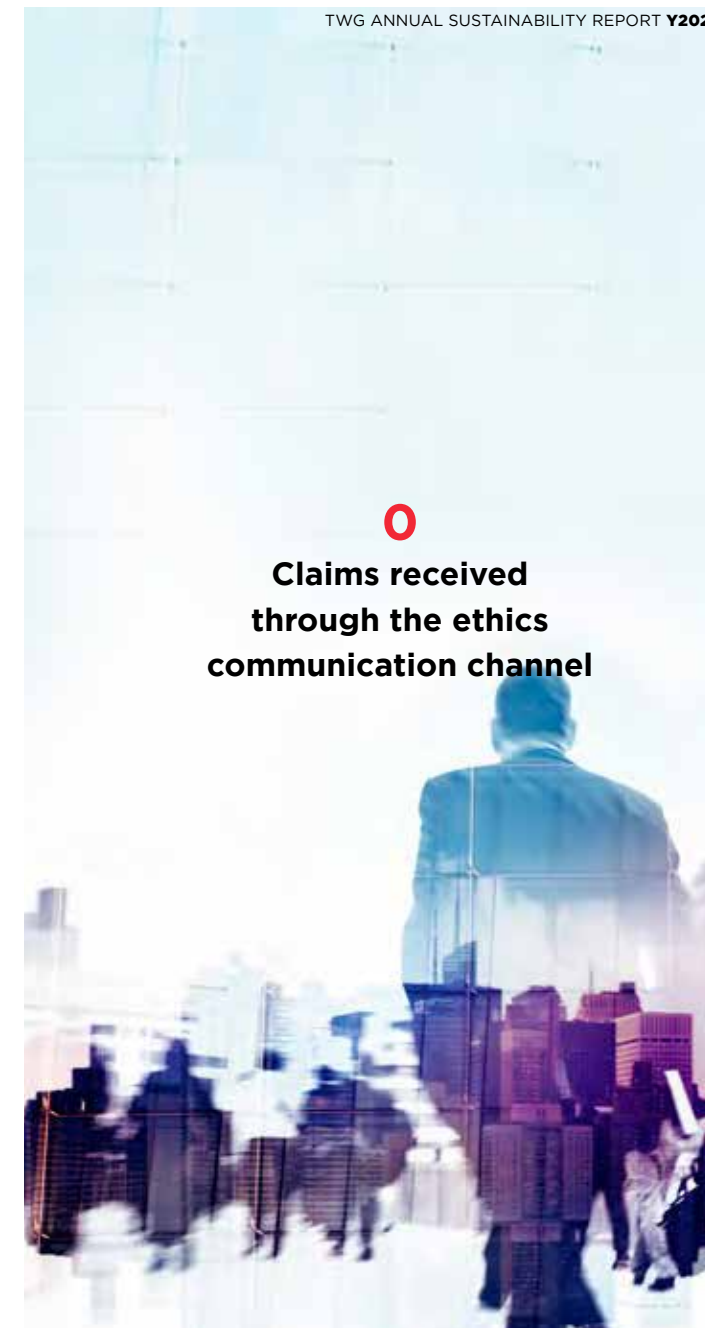


11 GOVERNANCE INFORMATION ESRS G1

7
New Corporate Policies



4
Reviews of existing corporate policies



0
Claims received through the ethics communication channel

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

ESRS 2 SBM-3

Material impacts, risks and opportunities and their interaction with the strategy and business model

At **TWG**, we are committed to conducting business with integrity and complying with the laws and regulations of each country in which we operate.

Logistics companies must comply with a variety of international regulations that vary by country and type of goods being transported. These include security standards, documentation and customs procedures. Failure to comply can result in fines, penalties and damage to a company's reputation.

In a certain way, our activity faces risks that occur in the short, medium and long term associated with bribery, corruption and anti-competitive practices due to the large number of contractors, suppliers and other entities in the value chain, competitive bidding and for operating in high-risk countries according to the Transparency International Report30of the year 2024 that ranks Mexico in 26th place.

As a global industry organization, we are continually improving our compliance program and rely on building and maintaining a common understanding of how we expect business to be conducted with third parties.

The Board of Directors (BoD) is ultimately responsible for overseeing **TWG**'s corporate culture and business conduct.

Our CA not only has extensive experience in the sector, but also training that reinforces their knowledge and improves their competencies, in line with the strategy and business model:

- Carlos Llonis, our CEO, has completed training courses such as PDG at IESE and the Counselors Program at ESADE.
- Virginia Michelena, our VP and CHRO has a Master's degree in Commercial Management, Professional program in people development, General Management Program: PDG at IESE and during the last year she has specifically carried out training in Sustainability and double materialityand in the preparation of Equality Plans.
- Alfredo Llonis, who has also completed IESE's Management Program and the IESE counselor training.
- Vicente Tamarit, who has completed the International Trade course of the Valencia Chamber of Commerce, the O.E.A. (Authorized Economic Operator) given by the Valencia Customs Inspection and different titles of the General Directorate of Transport.
- Jesús Sanz is also the CFO of **TWG**. He has an Advanced Degree in Financial Modeling taught and certified by AFI (Analistas Financieros Internacionales), the Program for Advisors taught and certified by ESADE, the Stock Market Analysis Program taught and certified by the Madrid Stock Exchange, the Business Recovery Program taught and certified by EADA Business School (Escuela de Alta Dirección y Administración), the Cost Analysis and Accounting Program taught and certified by Ernst&Young..

The **Regulatory Compliance Committee (CCN)** promotes a culture of corporate integrity. It is in charge of drafting the Policies, promoting the procedures to ensure compliance with these Policies and, therefore, ensuring compliance with the Code of Ethics and receiving complaints and claims through the ethics communication channel provided. It is chaired by the VP and CHRO and formed by the Legal Director, the Sustainability Director (members) and the **TWA** Controller (secretary), who keep the Board of Directors (CA) informed of its management and progress.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

In the event that the annual compliance objectives are not met, the Board of Directors (BoD) proposes areas of opportunity to achieve them.

TWG does not yet have an RSM (Compliance Risk Matrix), which is essential for identify, evaluate and manage the risks associated with non-compliance with regulations and The company conducted a criminal risk mapping of all its global operations during 2024 with the assistance of Deloitte, which will be finalized during 2025 and which becomes the basis and roadmap for the construction of a **TWG** RSM. This criminal risk map is reviewed by the Regulatory Compliance Committee (RCC), which determines the procedures and actions to improve compliance.

Management of impacts, risks and opportunities

G1-1 Business conduct policies and corporate culture

TWG's compliance framework is anchored in its corporate values, the **TWG** Code of Conduct and the **TWG** Code of Ethics.

Ethical (EC), along with our specific policies.

The CE, CEP, PA, PSGI and PPD are all available on our website.²⁹

The EC, HRP, IDI, IP, PRSE and PAC are translated into all the languages of the countries in which we operate.

The CEP, the PA, the PCS and the PSGI are translated into English. The PCI and PPD are only available in Spanish.

Code of Ethics

TWG's Code of Ethics³⁰ sets out its values and establishes a clear set of ethical standards for the company and covers all aspects of its operations. It includes guidelines for appropriate conduct, such as respect for human rights, and details the company's commitments to practices such as diversity, fair competition, and anti-bribery and anti- corruption measures. It also covers business integrity, including regulations, as well as the company's social responsibilities towards environmental protection and socio-economic development.

Code of Ethics (CE)

Supplier Code of Ethics	Anti-Corruption Policy	Human Rights Policy	Integrated Environmental, Quality and Occupational Health and Safety Policy	Information Security Policy	Data Protection Policy
CEP	PA	PDH	PI	PSGI	PPD
Sustainable Procurement Policy	Conflict of Interest Policy	Inclusion, Diversity and Equal Opportunity Policy			
PCS	PCI	IDI			
	Transfer Pricing Policy	CSR Policy			
	PPT	PRSE			
		Harassment Protocol			
		PAC			

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30 https://tw-group.com/wp-content/uploads/2024/12/2024_TWG_CE.pdf

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

The **Regulatory Compliance Committee (NCC)** is the body in charge of ensuring compliance with the Code of Ethics (CE), promoting the necessary internal procedures in our scope of action and its dissemination through the training of all employees. It manages our ethical communication channel, investigates the communications received and reports to the Board of Directors. Composed of three women and one man (75% female presence), the NCC meets monthly to supervise and ensure compliance with its initiatives. It also prepares an annual report containing the content of the monthly minutes.

All employees receive specific training on our Code of Ethics (CE). The HR area is responsible for training those joining **TWG**, who receive an infographic of the Code of Ethics (CE) together with a presentation of the company's culture, training on cybersecurity and data protection and occupational risks. In addition, once a year, the content is updated for all employees through a training video on our e-learning platform, which includes a comprehension assessment, the result of which is recorded. Mandatory training is therefore included as part of the induction process for new employees and is updated through a training video and an assessment. During 2024, 126 trainings have been conducted through our e-learning platform, reaching a total of 207 hours on this topic.

During 2025, these refresher courses will continue to be expanded to include topics such as Human Rights and Sustainability, Quality and the Environment, and Anti-Corruption.

Ethical Communication Channel

TWG provides a specific tool for reporting financial or legal breaches and irregularities, which can be accessed by individuals such as employees, directors, customers, suppliers, and business partners via our website or by sending an email to

cce@tw-group.com.³¹

³¹ This procedure does not include our operations in Sweden since, according to Swedish regulations, an external company must manage the reception, channeling and classification of complaints, and therefore this contract was established in May 2024 and is still in force.

All communications are reviewed and evaluated by the Regulatory Compliance Committee (NCC), which assesses whether the reported concern is applicable provided that the following violations of our Code of Ethics (CE) are suspected or observed. Whistleblowers are protected from any type of retaliation or discriminatory or disciplinary action as a result of filing a complaint.

During the course of the year 2024, no claims or complaints have been received.

RELATIONSHIP WITH SUPPLIERS

📌 G1-2 y G1-6

Supplier relationship management and payment practices

The success of **TWG's** business model is based on strong relationships with suppliers who share the same ethical principles as the company. Our expectations for suppliers are set out in the Supplier Code of Ethics (SCE), which is disseminated through our website³⁵ and given to each supplier at the beginning of our business relationship.

This code addresses potential risks related to labor practices, human rights, health and safety, the environment, and bribery and corruption in the supply chain. Suppliers must comply with the standards and national laws relating to child and forced labor, working hours, wages and benefits, and non-discrimination.

In line with our commitment to sustainable development, we promote local sourcing. Our **TWG's** total purchasing volume during 2024 has been €226,486 million, as shown in the following table:

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Purchase volume

	Y2024 Mill. €	% del total
TWA	13.246 €	6%
TWL	213.239 €	94%
Investees	0,691 €	0%
Total	226.486 €	100%

Types of suppliers by origin

	Volume Y2024 Mill. €	% of total
Local suppliers less than 200 kms from the place of delivery	47562	21%
Domestic suppliers	135892	60%
International Suppliers	43032	19%
Total	226486	100%

We expect suppliers to prioritize occupational health and safety, as well as the environmental compliance, and that support **TWG**'s goal of reducing Scope 3 emissions. This includes providing GHG emissions data and setting emissions reduction targets for its operations, aligned with the goals and trajectory of the Paris Agreement.

We require our key suppliers to adhere to our Supplier Code of Ethics (SCE) and to share it with their subcontractors and other business partners involved in the supply of goods and services described in the main contract. Suppliers are subject to a checklist system to assess risks and conduct audits. **TWG** may terminate a contract with a supplier who violates the Supplier Code of Ethics (SCE) or refuses to participate in a remediation plan when requested.

The **Supplier Code of Ethics (CEP)** is reinforced through the **Sustainable Procurement Policy (SPP)**, which establishes sustainability requirements in line with our commitment to promote best practices throughout the procurement process. This policy ensures performance aligned with our values, generating value and benefits for society and the environment.

All personnel involved in the procurement of goods and services on behalf of the group, both at **TWL** by warehouse managers and at **TWA** by plant managers, comply with the "Standard Procedure". This procedure describes the method of supplier selection and evaluation **TWG**, considering quality, environmental, risk prevention, safety and other specific aspects of the activity, as well as the certifications recognized in the different areas and management systems according to the supplier's typology. In the event of the financial area verifies the supplier's tax and fiscal compliance and reliability prior to its entry as a supplier, with the approval of the purchasing area.

Throughout this year, the purchasing department has been evaluating the internal procedure for recording supplier assessments in our systems, with the goal of systematizing the process to classify suppliers based on their compliance scores within the corresponding supplier assessment templates.

Based on the ratings obtained, the Purchasing teams at **TWA** and **TWL** not only review and monitor supplier performance and adherence to this policy, but also compare it against **TWG**'s sustainability requirements and established expectations.

In 2025, the Purchasing department will develop a risk matrix based on the typology of active suppliers, taking into account the requirements of other relevant departments such as Cybersecurity and Data Protection.

In 2024, we did not receive any reports or complaints from suppliers or the broader community regarding non-compliance in the areas of human rights, labor or environmental practices, or incidents related to corruption—through either our corporate website or our ethical communication channel.

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

As a 2025 objective, the Sustainability department will assess the ESG performance and compliance of active suppliers, along with their corresponding risk evaluations.

Based on these results, the department will determine which suppliers are to be audited on-site, in accordance with applicable standards. To support this process, the Purchasing department will keep The Sustainability area informed about existing and newly approved suppliers, while the Legal department will provide visibility into ESG commitments made with our clients. This coordinated approach ensures full traceability of information and compliance with client-specific requirements.

These procedures will improve our compliance with supplier management standards.

The usual payment term is 87 days for large suppliers and 74 days for the rest and has no pending legal proceedings due to payment delays. The term is guaranteed by our ERPs.

FIGHT AGAINST CORRUPTION AND BRIBERY

📌 G1-3

Preventing and detecting corruption and bribery

We have a zero-tolerance approach to bribery and corruption, and are committed to behaving ethically and with integrity in all our business dealings and relationships worldwide. We comply with all laws related to anti-bribery and corruption in all jurisdictions in which we operate. We do not engage in or tolerate any form of facilitation payments.

This approach to bribery, fraud and corruption is clearly communicated to employees through the Code of Ethics and Anti-Corruption Policy, which also includes mandatory training. For suppliers, these expectations are established and clarified through our Supplier Code of Ethics (see **G1-2** Supplier Relationship Management).

The offshoring of our activities could raise the possibility of the existence of the risk of double invoicing, which in turn raises the risk of fraud and money laundering. These risks

are of relative importance since, without adequate controls, they could result in fines, litigation and loss of customers. At **TWA**, we follow a comprehensive process in which our ERP (SAP) verifies the consistency between production and amounts charged to customers, which also requires validation by several people, avoiding over-invoicing. In line with the above, supplier invoicing requires validation by several people, preventing the potential risk of fraud. Finally, all payments and collections are made electronically, not using cash.

On the other hand, **TWG** has a Transfer Pricing Policy that ensures that transactions are carried out in accordance with the Arm's Length Principle and provides a clear and consistent framework for pricing, which facilitates auditing and internal control, ensuring that data is accurate and thus avoiding penalties, tax adjustments and litigation.

TWG does not use banking entities in tax havens nor does it provide services to public administrations or companies in any area or geography and our link is only for regulatory compliance through the digital channels provided by the company only by the **TWG** managers who have been specifically designated for this purpose by means of specific procedures and who are monitored by the company's legal department. In case of suspicion of a corruption offense, the Regulatory Compliance Committee (CCN) is separated from the management body.

All of our contracts are procured on a competitive basis and this increases the risk of engaging in anti-competitive behavior. Such conduct could result in litigation, litigation and loss of credibility. **TWG** does not obtain its contracts through direct award. The initial phases are always through the different digital platforms managed only by the clients where bids are published. In addition, confidentiality agreements (NDAs) are signed, essential to ensure that the information shared during the bidding process is handled in a secure and responsible manner.

Our ambition is to always apply best practices and act accordingly with the applicable legislation on tax calculation and tax reporting to ensure that we pay the right amount of tax at the right time in the countries where we operate. In close cooperation with tax advisors, we monitor updates and changes in tax legislation to assess the impact.

About this
Report

01.
Our Commitments to
Sustainability

02.
Aspects Y2024
Sustainability
Management
Highlights

03.
Our Sustainability
Commitments

04.
Disclosures ESRS 2
general information
Basis for preparation

05.
Governance
of the Sustainability

06.
Our Strategy and
Business Model

07.
Our
Stakeholders

08.
Materiality -
Assessment Process

09.
Environmental
Reporting
ESRS E1 & E2

10.
Social Reporting
ESRS S1, S2 Y S3

11.
Business Conduct
ESRS G1

12.
Financial Reporting

Training and awareness

During 2024, the Regulatory Compliance Committee (CCN) developed a training video that will be disseminated during 2025 on our Anti-Corruption Policy through our e-learning platform. This training will be of the Company’s management and those who are part of **TWG**’s Administration and Purchasing departments are obliged to comply with this **Code of Ethics**.

INCIDENTS OF CORRUPTION AND BRIBERY

📌 **G1-4**

Corruption or bribery incidents

TWG has not had any incidents or been subject to any legal action related to corruption or bribery during the 2024 period.

POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

📌 **G1-5**

Political influence and lobbying activities

No member of **TWG**’s Board of Directors has held positions in the public administration or regulatory bodies in the two years prior to the 2024 reporting period.

TWG does not provide funding to political parties of any kind and is not registered in the EU Transparency Register or an equivalent transparency register in a member state.

Information Security, Controls and Awareness Campaigns

TWG has a Corporate Information Security Policy (CSIP) that provides a framework of reference and consistency in this area and applies to all systems, employees and external suppliers with access to our company’s information systems and infrastructure. This area is led by our CTO | CISO reporting to the Board of Directors (BoD).

During the year 2024, the SGI Committee has been formed, which has the characteristic of being multidisciplinary and has set the objectives and commitments for the year 2025. The ability of our employees to identify phishing emails and report them automatically to our security team has been improved.

In this reporting period, we have implemented security policies and procedures based on ISO 27001 to protect our systems and data. We have preventive measures in place such as MFA, access management and network security, threat detection (phishing, ransomware and third- party vulnerabilities) with SIEM and incident response through a structured cybersecurity incident management plan that includes cybersecurity awareness, monitoring with SIEM and risk management with suppliers. In addition, cybersecurity training is being provided to employees, addressing topics such as phishing, secure password management, data protection and incident response. We follow an ongoing awareness plan to strengthen security. Our plants are certified to the VDA Tisax Standard.

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

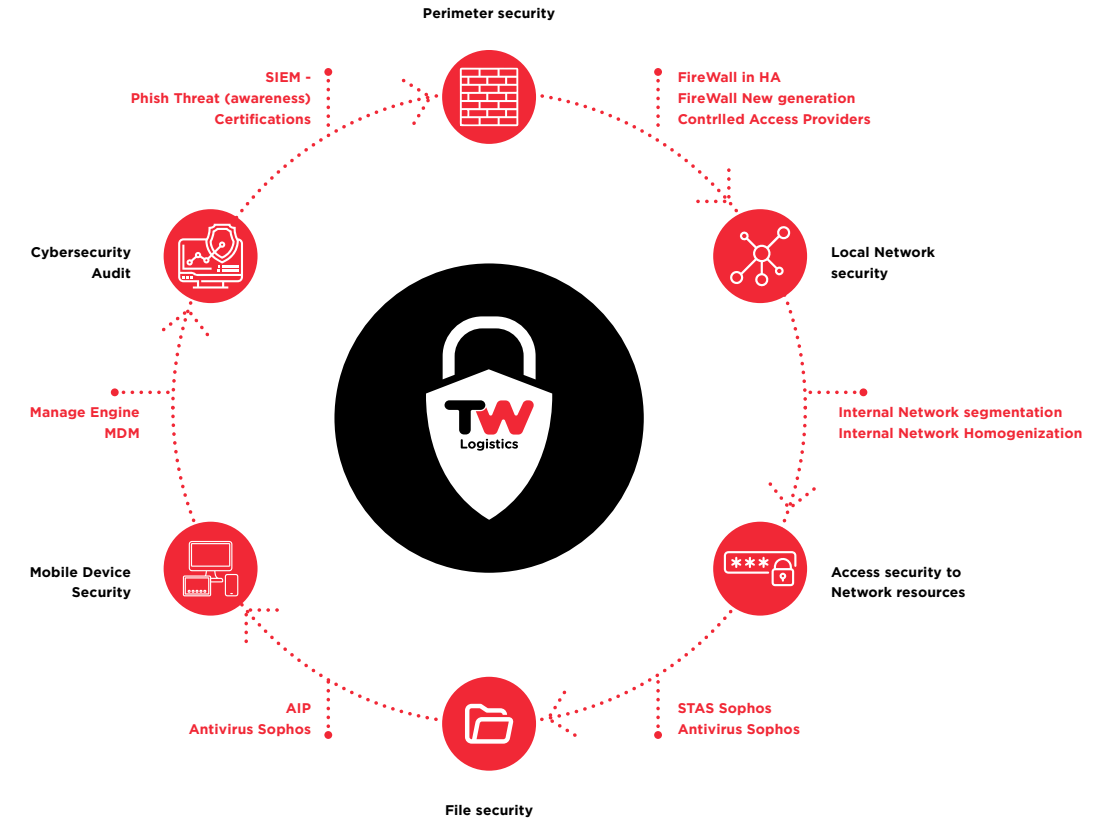
10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

Our objectives for the year 2025 to be achieved are as follows:

- Ensure secure access to critical systems by implementing multi-factor authentication (MFA) and continuously reviewing its effectiveness for critical systems with MFA implemented and operational and for critical users with MFA enabled.
- Ensure the protection of sensitive data by implementing and monitoring encryption on computers and computer storage with BitLocker enabled and operational and on devices with encryption applied (servers, external storage, backups).
- Optimise vulnerability management by efficiently detecting, prioritising and remediating security risks from critical vulnerabilities corrected within the defined timeframe and mean time to remediate (MTTR).
- Validate and continuously improve disaster recovery plans through structured testing and effectiveness analysis of critical recovery scenarios tested and validated from findings identified and corrected after each test and of critical systems and processes with recovery within the defined RTO.
- Mitigate risk in the supply chain by ensuring that at least 80% of critical suppliers comply with minimum security requirements established in the risk management policy and those with security assessments carried out and corrective measures applied following audits.
- Strengthen the cybersecurity culture by ensuring that 100% of staff receive annual training in best practices and that at least two phishing drills per year are conducted to assess and improve awareness of attacks.



About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Specific notes on NEIS G-1

ESRS DR	DATA POINT/METRICS	ACCOUNTING POLICY
G1-1	How TWG protects whistleblowers	All complaints are handled following the guidelines of the Ethical Communication Channel (cce) through the Regulatory Compliance Committee (CCN). Only cases that are concluded within the fiscal year are disclosed.
G1-4	Legal action	The number of legal actions pending or completed during the reporting period regarding anti-competitive behavior and violations of antitrust and monopoly legislation.
G1-4	Amount of monetary losses	Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations.
G1-4	Number of confirmed incidents of corruption or bribery	Determined by the number within the reporting year.
G1-4	Number of confirmed incidents in which workers themselves were dismissed or sanctioned for incidents involving corruption or bribery.	Determined by the number within the reporting year.
G1-4	Number of confirmed incidents related to contracts with business partners that were terminated or not renewed due to corruption or bribery-related violations.	Determined by the number within the reporting year.

12

Financial Reporting

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

12 Financial Reporting

At the time of writing this Report, **TWG**'s annual Financial Statements for the period 2024 are pending closure, so this information will be included in the next FYE, although below we provide a comparison of year 2021 vs. year 2023 as expressed in our annual accounts.

We also include the comparative turnover by country for the year 2023 vs. year 2024

Turnover difference Y2024 vs Y2023 by country	2.024	TWL	TWA	Affiliteted Companies	Setland	Year 2024 vs. Year 2023	Year 2024 vs. Year 2023 en %	2023
Spain	170.467.306	165.945.316		158.239	4.363.751	6.998.306	4,3%	163.469.000
France	56.310.404	56.310.404				8.156.404	16,9%	48.154.000
Portugal	18.265.442	18.265.442				23.442	0,1%	18.242.000
Mexico	18.871.101		18.871.101			3.438.673	22,3%	15.432.428
USA	16.364.840	992.532	15.372.308			2.431.204	17,4%	13.933.636
Germany	11.346.148		11.346.148			187.148	1,7%	11.159.000
Sweden	14.594.388	14.594.388				8.108.388	125,0%	6.486.000
UK	6.146.549	6.146.549				819.549	15,4%	5.327.000
Total	312.366.178	262.254.631	45.589.557	158.239	4.363.751	30.163.114	11%	282.203.064

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

2023		2022		2021		Diferencia	Diferencia %
CONCEPT	Amount (in thousands of euros)	CONCEPT	Amount (in thousands of euros)	CONCEPT	Amount (in thousands of euros)	2023-2021	
Billing	265.889	Facturación	235.979	Facturación	195.004	70.885	36,35%
Profit before taxes by COUNTRY		Profit before taxes by COUNTRY		Profit before taxes by COUNTRY			
Spain	2.626 €	España	8.233 €	España	438 €	2.188	499,54%
France	546 €	Francia	1.881 €	Francia	726 €	-180	-24,79%
USA	1.565 €	USA	1.014 €	USA	1.244 €	321	25,80%
Portugal	-80 €	Portugal	-1.103 €	Portugal	268 €	-348	-129,85%
UK	416 €	UK	253 €	UK	35 €	381	1088,57%
Germany	-957 €	Alemania	1.677 €	Alemania	577 €	-1.534	-265,86%
Mexico	1.316 €	México	1.438 €	México	1.449 €	-133	-9,18%
Sweden	401 €	Suecia	-154	Suecia	0	401	
Taxes on profits paid	1.410 €	Taxes on profits paid	2803	Taxes on profits paid	1158	252	21,76%
Taxes on profits paid	0 €	Taxes on profits paid	0 €	Taxes on profits paid	0 €	0	0,00%
Deuda Pública							
Cofides	7.000 €	Cofides	9.000 €	Cofides	9.000 €	-2.000	-22,22%
ICO	19.493 €	ICO	23.354 €	ICO	22.850 €	-3.357	-14,69%

We have received no environmental, labor, tax/financial penalties during the year 2024.

TABLE OF CONTENTS

IRO-2 Disclosure Requirement - Disclosure requirements in ESRs covered by the company’s sustainability statement.

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

LIST OF MATERIAL DRS	PARAGRAPH OR PAGE REFERENCE	DRS BILL OF MATERIALS	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE
ESRS 2 - General Disclosures		E1 - Climate Change		S1 - Own workforce		S2- Value Chain Workers	
BP-1 General basis for the elaboration of the sustainability statement	13	ESRS 2 GOV-3-E1 Integration of sustainability-related results into incentive plans	22	ESRS 2 SBM-2-S1 - Stakeholder interests and opinions	48	ESRS 2 SBM-2-S2 Stakeholder interests and opinions	67
BP-2 Disclosures in connection with specific circumstances	13	E1-1 Transition plan f o r climate change mitigation	44	ESRS 2 SBM-3-S1 - Material impacts, risks and opportunities and their interaction with the strategy and business model.	49	ESRS 2 SBM-3-S2 Impacts, risks, and opportunities o f materials and their interaction with the strategy and business model	67
GOV-1 The role of the organs of administration, management and supervision	15	31		S1-1 Policies related to own workforce	48	S2-1 Policies related to workers in the value chain	67
GOV-2 Information provided to, and sustainability issues addressed by, the company’s administrative, management and supervisory bodies.	18	Interaction with strategy and business model	30	S1-2 Processes for interacting with own workforce and workers’ representatives on impacts	49	S2-2 Processes for interacting with value chain workers about impacts and material opportunities	67
GOV-3 Integrating sustainability-related performance into incentives	22	ESRS 2 IRO-1-E1 Description of processes for identifying and assessing material climate-related impacts, risks and opportunities.	35	S1-3 Processes for remediation of negative impacts and channels for workforce to raise concerns	50	S2-3 Processes for remediating negative impacts and channels for workers in the value chain to raise concerns	67
GOV-4 Due diligence statement	22	E1-2 Policies related t o climate change mitigation and adaptation	48	S1-4 Adoption of measures on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of such actions.	50	S2-4 Take action on material impacts on workers in the value chain, and approaches to managing material risks and pursuing material opportunities related to workers in the value chain, and the effectiveness of those actions.	67

About this Report
01. Our Commitments to Sustainability
02. Aspects Y2024 Sustainability Management Highlights
03. Our Sustainability Commitments
04. Disclosures ESRS 2 general information Basis for preparation
05. Governance of the Sustainability
06. Our Strategy and Business Model
07. Our Stakeholders
08. Materiality - Assessment Process
09. Environmental Reporting ESRS E1 & E2
10. Social Reporting ESRS S1, S2 Y S3
11. Business Conduct ESRS G1
12. Financial Reporting

LIST OF MATERIAL DRS	PARAGRAPH OR PAGE REFERENCE	DRS BILL OF MATERIALS	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE
ESRS 2 - General Disclosures		E1 - Climate Change		S1 - Own workforce		S2- Value Chain Workers	
GOV-5 Risk management and internal controls over reporting of sustainability reports	23	E1-3 Actions and resources related to climate change policies	48	S1-5 Objectives related to the management of material adverse impacts, the promotion of positive impacts and the management of risks and opportunities	50	S2-5 Targets related to management of material negative impacts, promotion of positive impacts, and management of material risks and opportunities.	68
SBM-1 Strategy, business model and value chain	25, 26, 27	E1-4 Targets related to climate change mitigation and adaptation	50	S1-6 Characteristics of the company's employees	51	S3 - Affected communities	
SBM-2 Stakeholder Interests and Opinions	30	E1-5 Energy consumption and mix	50	S1-9 Diversity metrics	55	ESRS 2 SBM-2-S3 - Stakeholder interests and opinions	69
SBM-3 Material impacts, risks, and opportunities and their interaction with the strategy and business model	38, 45, 56, 99	E1-6 Gross Scopes 1, 2, 3 and total GHG emissions	51	S1-10 Adequate wages	57	ESRS 2 SBM-3-S3 - Material impacts, risks and opportunities and their interaction with the strategy and business model.	69
Strategy and business model	25	E1-9 Anticipated financial impact of material, physical and transitional risks and potential climate- related opportunities	53	S1-11 Social protection	58	S3-1 Policies related to affected communities	69
IRO-1 Description of processes for identifying and assessing material impacts, risks, and opportunities	35	E2 - Pollution		S1-13 Training and skills development metrics	58	S3-2 Processes for involving affected communities on impacts	69
IRO-2 ESRS disclosure requirement s covered by the company's sustainability statement	110	ESRS 2 IRO-1-E2 Description of processes for identifying and assessing impacts, risks and opportunities related to material contamination	35	S1-14 Health and safety metrics	60	S3-3 Processes for remediating negative impacts and channels for affected communities to raise concerns.	201

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

LIST OF MATERIAL DRS	PARAGRAPH OR PAGE REFERENCE	DRS BILL OF MATERIALS	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE
ESRS 2 - General Disclosures		E1 - Climate Change		S1 - Own workforce		S2- Value Chain Workers	
		E2-1 Pollution-related policies	41	S1-15 Work-Life Balance Metrics	64	S3-4 Measures taken on material impacts on affected communities and approaches to risk management and the pursuit of opportunities related to affected communities and the effectiveness of those actions	20
		E2-2 Actions and resources related to contamination	42	S1-16 Compensation metrics (salary gap and total compensation)	57	S3-5 Objectives related to the management of material adverse impacts, the promotion of positive impacts and the management of material risks and opportunities	20
		E2-3 Pollution-related objectives	42	S1-17 Incidents, complaints and serious human rights impacts	64	G1 - Business conduct	
		E2-4 Air, water and soil pollution	42			ESRS 2 GOV-1-G1 EI role of administrative, management and supervisory bodies	15
		E2-6 Expected financial effects of impacts, risks, and opportunities related to materials contamination	42			ESRS 2 IRO-1-G1 Description of processes to identify and assess impacts, risks and opportunities.	35
						G1-1 Business conduct policies and corporate culture	83
						G1-2 Supplier relationship management	101

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

LIST OF MATERIAL DRS	PARAGRAPH OR PAGE REFERENCE	DRS BILL OF MATERIALS	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE	PARAGRAPH OR PAGE REFERENCE
ESRS 2 - General Disclosures		E1 - Climate Change		S1 - Own workforce		S2- Value Chain Workers	
						G1-3 Prevention and detection of corruption and bribery	103
						G1-4 Incidents of corruption or bribery	104
						G1-5 Political influence and lobbying activities	104

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

INDICES

LIST OF DATAPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION

Disclosure requirement: ESRS 2 IRO-2, paragraph 56 and ESRS 2, appendix B

DISCLOSURE REQUIREMENT. DISCLOSURE AND DATA POINT RELATED	SFDR REFERENCE	PILLAR 3 REFERENCE	REFERENCE OF THE REFERENCE REGULATION	REFERENCE TO LEGISLATION EU CLIMATE CHANGE	LAW 11/2018	MATERIAL	PAGE REFERENCE (AND PARAGRAPH)
ESRS 2 Diversity of gender of the Board GOV-1 paragraph 21 (d)	Indicator number 13 of the Table #1 of Annex 1		Delegated Regulations (EU) 2020/1816 of the Commission, Annex II		Section I Section II. Information on social issues and relating to personnel: Employment		15
ESRS 2 GOV-1 Percent of members of the board of directors, which are independent paragraph 21 e)			Delegated Regulations (EU) 2020/1816, Annex II		Section I Section II. Information on social issues and relating to personnel: 21 e) Equality		15
ESRS 2 GOV-4 Statement on due diligence Paragraph	Indicator number 10 Table #3 of Annex 1						22
ESRS 2 SBM-1 Participation in related activities with fuels fossils Paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449 bis Regulation (EU) No. 575/2013: Commission of Execution Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2:Information Risk qualitative Social	Delegated Regulations (EU) 2020/1816, Annex II				31
ESRS 2 SBM-1 Participation in related activities with To production of chemicals paragraph 40 d) II	Indicator number 9 Table #2 of Annex 1		Delegated Regulations (EU) 2020/1816, Annex II				n/a
ESRS 2 SBM-1 Participation in related activities with To arms controversies Paragraph 40 d) III	Indicator number 14 Table #1 of Annex 1		Delegated Regulations (EU) 2020/1818, Annex II 12(1) Delegate Regulation (EU) 2020/1816, annex II				n/a

About this Report

- 01.** Our Commitments to Sustainability
- 02.** Aspects Y2024 Sustainability Management Highlights
- 03.** Our Sustainability Commitments
- 04.** Disclosures ESRS 2 general information Basis for preparation
- 05.** Governance of the Sustainability
- 06.** Our Strategy and Business Model
- 07.** Our Stakeholders
- 08.** Materiality - Assessment Process
- 09.** Environmental Reporting ESRS E1 & E2
- 10.** Social Reporting ESRS S1, S2 Y S3
- 11.** Business Conduct ESRS G1
- 12.** Financial Reporting

DISCLOSURE REQUIREMENT. DISCLOSURE AND DATA POINT RELATED	SFDR REFERENCE	PILLAR 3 REFERENCE	REFERENCE OF THE REFERENCE REGULATION	REFERENCE TO LEGISLATION EU CLIMATE CHANGE	LAW 11/2018	MATERIAL	PAGE REFERENCE (AND PARAGRAPH)
ESRS 2 SBM-1 Participation in activities related to the cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, article 12, paragraph 1, Delegated Regulation (EU) 2020/1816, annex II				n/a
ESRS E1-1 Transition plan to achieve climate neutrality by 2050, paragraph 14.				Regulation (EU) 2021/1119, Article 2(1)	Section I Section I. Information on environmental issues: Climate change		30
ESRS E1-1 Companies excluded from benchmarks aligned with the Paris Agreement paragraph 16(g)		Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking portfolio Climate change transition risk: credit quality of exposures by sector, issues and residual maturity.	Delegated Regulation (EU) 2020/1818, Article 12.1 d) to g), and Article 12.2				30
GHG emission reduction targets ESRS E1-4 para 34	Indicator number 4 Table #2 of Annex 1	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking portfolio - Climate change transition risk: alignment metrics.	Delegated Regulation (EU) 2020/1818, Article 6		Section I Section I. Information on environmental issues: Climate change		36
ESRS E1-5 Energy consumption from fossil fuel sources by source (high climate impact sectors only) para 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				Section I Section I. Information on environmental issues: Sustainable use of resources		36

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

DISCLOSURE REQUIREMENT. DISCLOSURE AND DATA POINT RELATED	SFDR REFERENCE	PILLAR 3 REFERENCE	REFERENCE OF THE REFERENCE REGULATION	REFERENCE TO LEGISLATION EU CLIMATE CHANGE	LAW 11/2018	MATERIAL	PAGE REFERENCE (AND PARAGRAPH)
ESRS E1-5 Energy consumption and mix para. 37	Indicator number 5 Table #1 of Annex 1				Section I Section I. Information on environmental issues: Sustainable use of resources		36
ESRS E1-5 Energy intensity associated with activities in sectors with high climate impact paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Section I Section I. Information on environmental issues: Sustainable use of resources		36
ESRS E1-6 Gross Scope 1, 2, 3 and total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Appendix 1	Article 449a; Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking portfolio - Climate change transition risk: credit quality of exposures by sector, issues and residual maturity.	Delegated Regulation (EU) 2020/1818, Article 5(1), Article 6 and Article 8(1)		Section I Section I. Information on environmental issues: Pollution		37
ESRS E1-7 GHG removals and carbon credits para. 56				Regulation (EU) 2021/1119, Article 2(1)	Section I Section I. Information on environmental issues: Pollution		n/a
ESRS E1-9 Exposure of the reference portfolio to physical risks related to climate, paragraph 66.			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Section I Section I. Information on environmental issues: General		34
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets with significant physical risk paragraph 66 (c).		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5: Banking book - Physical climate change risk: exposures subject to physical risk.					n/a

About this Report

01. Our Commitments to Sustainability
02. Aspects Y2024 Sustainability Management Highlights
03. Our Sustainability Commitments
04. Disclosures ESRS 2 general information Basis for preparation
05. Governance of the Sustainability
06. Our Strategy and Business Model
07. Our Stakeholders
08. Materiality - Assessment Process
09. Environmental Reporting ESRS E1 & E2
10. Social Reporting ESRS S1, S2 Y S3
11. Business Conduct ESRS G1
12. Financial Reporting

DISCLOSURE REQUIREMENT. DISCLOSURE AND DATA POINT RELATED	SFDR REFERENCE	PILLAR 3 REFERENCE	REFERENCE OF THE REFERENCE REGULATION	REFERENCE TO LEGISLATION EU CLIMATE CHANGE	LAW 11/2018	MATERIAL	PAGE REFERENCE (AND PARAGRAPH)
ESRS E1-9 Breakdown of the carrying amount of its real estate assets by energy efficiency class, paragraph 67(c).		Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; Template 2: Banking portfolio - Climate change transition risk: loans secured by real estate - Energy efficiency of collateral.					n/a
ESRS E1-9 Extent of portfolio exposure to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II				26
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR (European Pollutant Release and Transfer Register) Regulation emitted to air, water and soil, item 28.	Indicator number 8				Section I Section I. Information on environmental issues: Pollution		41
	Table #1 of Annex 1						
	Indicator number 2						
	Table #2 of Annex 1						
	Indicator number 1						
	Table #2 of Annex 1						
	Indicator number 3						
	Table #2 of Annex 1						

About this Report

- 01.** Our Commitments to Sustainability
- 02.** Aspects Y2024 Sustainability Management Highlights
- 03.** Our Sustainability Commitments
- 04.** Disclosures ESRS 2 general information Basis for preparation
- 05.** Governance of the Sustainability
- 06.** Our Strategy and Business Model
- 07.** Our Stakeholders
- 08.** Materiality - Assessment Process
- 09.** Environmental Reporting ESRS E1 & E2
- 10.** Social Reporting ESRS S1, S2 Y S3
- 11.** Business Conduct ESRS G1
- 12.** Financial Reporting

DISCLOSURE REQUIREMENT. DISCLOSURE AND DATA POINT RELATED	SFDR REFERENCE	PILLAR 3 REFERENCE	REFERENCE OF THE REFERENCE REGULATION	REFERENCE TO LEGISLATION EU CLIMATE CHANGE	LAW 11/2018	MATERIAL	PAGE REFERENCE (AND PARAGRAPH)
ESRS E3-1 Water and Marine Resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Section I Section I. Information on environmental issues: Sustainable use of resources		n/a
ESRS E3-1 Dedicated Policy Paragraph 13	Indicator number 8 Table 2 of Annex 1						43
ESRS E3-1 Sustainable Oceans and Seas para 14	Indicator number 12 Table #2 of Annex 1						n/a
ESRS E3-4 Total recycled and reused water paragraph 28 c)	Indicator number 6.2 Table #2 in Annex 1				Section I Section I. Information on environmental issues: Sustainable use of resources		43
ESRS E3-4 Total water consumption in m ³ per net income from own operations paragraph 29	Indicator number 6.1 Table #2 of Appendix 1				Section I Section I. Information on environmental issues: Sustainable use of resources		43
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1						n/a
ESRS 2- IRO 1 - E4 paragraph 16 b)	Indicator number 10 Table #2 of Annex 1						n/a
ESRS 2 - IRO 1 - E4 paragraph 16 c)	Indicator number 14 Table #2 of Annex 1						n/a
ESRS E4-2 Sustainable agricultural practices or policies, paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1						n/a
ESRS E4-2 Sustainable oceans and seas, practices or policies, paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1						n/a
ESRS E4-2 Policies to address deforestation paragraph 24(d)	Indicator number 15 Table #2 of Annex 1				Section I Section I. Information on environmental issues: Biodiversity protection		n/a

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

DISCLOSURE REQUIREMENT. DISCLOSURE AND DATA POINT RELATED	SFDR REFERENCE	PILLAR 3 REFERENCE	REFERENCE OF THE REFERENCE REGULATION	REFERENCE TO LEGISLATION EU CLIMATE CHANGE	LAW 11/2018	MATERIAL	PAGE REFERENCE (AND PARAGRAPH)
ESRS E5-5 Non-recycled waste paragraph 37 d)	Indicator number 13 Table #2 of Annex 1				Section I Section I. Information on environmental issues: Biodiversity protection		44
ESRS E5-5 Hazardous wastes and radioactive wastes para 39	Indicator number 9 Table #1 of Annex 1				Section I Section I. Information on environmental issues: Circular economy and waste prevention and management.		44
ESRS 2- SBM3 - S1 Risk of incidents of forced labor paragraph 14 f)	Indicator number 13 Table #3 of Annex I				Section I Section I. Information on environmental issues: Circular economy and waste prevention and management.		48
ESRS 2- SBM3 - S1 Risk of incidents of child labor paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		48
ESRS S1-1 Human Rights Policy Commitments, paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		48
ESRS S1-1 Due diligence policies on issues addressed by fundamental Conventions 1 to 8 of the International Labor Organization, Paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		48

About this Report

01.

Our Commitments to Sustainability

02.

Aspects Y2024 Sustainability Management Highlights

03.

Our Sustainability Commitments

04.

Disclosures ESRS 2 general information Basis for preparation

05.

Governance of the Sustainability

06.

Our Strategy and Business Model

07.

Our Stakeholders

08.

Materiality - Assessment Process

09.

Environmental Reporting ESRS E1 & E2

10.

Social Reporting ESRS S1, S2 Y S3

11.

Business Conduct ESRS G1

12.

Financial Reporting

DISCLOSURE REQUIREMENT. DISCLOSURE AND DATA POINT RELATED	SFDR REFERENCE	PILLAR 3 REFERENCE	REFERENCE OF THE REFERENCE REGULATION	REFERENCE TO LEGISLATION EU CLIMATE CHANGE	LAW 11/2018	MATERIAL	PAGE REFERENCE (AND PARAGRAPH)
ESRS S1-1 Processes and Measures to Prevent Trafficking in Human Beings, paragraph 22	Indicator number 11 Table #3 of Annex I				Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		48
Occupational accident management system or policy ESRS S1-1 paragraph 23	Indicator number 1 Table #3 of Annex I				Section I Section II. Information on Social and Personnel Matters: Health and Safety		48
ESRS S1-3 Complaint/ grievance handling mechanisms, paragraph 32(c)	Indicator number 5 Table #3 of Annex I				Section I Section II. Information on Social and Personnel Matters: Equality		50
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88(b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Section I Section II. Information on Social and Personnel Matters: Health and Safety		60
ESRS S1-14 Number of days lost due to injury, accident, death or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				Section I Section II. Information on Social and Personnel Matters: Health and Safety		61
ESRS S1-16 Unadjusted gender pay gap, paragraph 97(a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Section I Section II. Information on Social and Personnel Matters: Equality		56
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				Section I Section II. Information on Social and Personnel Matters: Equality		n/a

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

DISCLOSURE REQUIREMENT. DISCLOSURE AND DATA POINT RELATED	SFDR REFERENCE	PILLAR 3 REFERENCE	REFERENCE OF THE REFERENCE REGULATION	REFERENCE TO LEGISLATION EU CLIMATE CHANGE	LAW 11/2018	MATERIAL	PAGE REFERENCE (AND PARAGRAPH)
ESRS S1-17 Incidents of Discrimination, paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				Section I Section II. Information on Social and Personnel Matters: Equality		65
ESRS S1-17 Non-compliance with UN Guiding Principles on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Section I Section II. Information on Social and Personnel Matters: Equality		65
ESRS 2- SBM-3 - S2 Significant risk of child labor or forced labor in the value chain, paragraph 11 b)	Indicators number 12 and n. 13 Table #3 of Annex I				Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		48
ESRS S2-1 Human Rights Policy Commitments, paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1 and n. 4 Table #3 of Annex I				Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		67
ESRS S2-1 Policies related to workers in the value chain, paragraph 18	Indicator number 11 and n. 4 Table #3 of Appendix 1						67
ESRS S2-1 Non-compliance with the principles of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, para. 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, art 12 (1)		Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		67

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

DISCLOSURE REQUIREMENT. DISCLOSURE AND DATA POINT RELATED	SFDR REFERENCE	PILLAR 3 REFERENCE	REFERENCE OF THE REFERENCE REGULATION	REFERENCE TO LEGISLATION EU CLIMATE CHANGE	LAW 11/2018	MATERIAL	PAGE REFERENCE (AND PARAGRAPH)
ESRS S2-1 Due diligence policies on issues addressed by the fundamental Conventions 1 to 8 of the International Labor Organization, Paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		67
ESRS S2-4 Human rights issues and incidents related to your upstream and downstream value chain, paragraph 36	Indicator number 14 Table #3 of Annex 1						67
ESRS S3-1 Human Rights Policy Commitments, paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		69
ESRS S3-1 non-compliance with the UN Guiding Principles on Business and Human Rights, ILO principles or OECD guidelines, paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, art 12 (1)				69
ESRS S3-4 Human Rights Issues and Incidents, paragraph 36	Indicator number 14 Table #3 of Annex 1				Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		69
ESRS S4-1 Policies related to consumers and end users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Appendix 1				Section I Section V. Company commitment to sustainable development:Consumers		73

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

DISCLOSURE REQUIREMENT. DISCLOSURE AND DATA POINT RELATED	SFDR REFERENCE	PILLAR 3 REFERENCE	REFERENCE OF THE REFERENCE REGULATION	REFERENCE TO LEGISLATION EU CLIMATE CHANGE	LAW 11/2018	MATERIAL	PAGE REFERENCE (AND PARAGRAPH)
ESRS S4-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and OECD Guidelines, paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, art 12 (1)		Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		73
ESRS S4-4 Human Rights Issues and Incidents, paragraph 35	Indicator number 14 Table #3 of Annex 1				Section I Section II and Section III. Information on Social and Personnel Matters and Information on Respect for Human Rights: Work Organization		73
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 b)	Indicator number 15 Table #3 of Annex 1				Section I Section IV. Information relating to the fight against corruption and bribery		89
ESRS G1-1 Whistleblower protection, paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				Section I Section III. Information on Human Rights		83
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		Section I Section IV. Information relating to the fight against corruption and bribery		89
ESRS G1-4 Anti-bribery and anti-corruption standards, paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				Section I Section IV. Information relating to the fight against corruption and bribery		89

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Article Law 11/2018	Spain Law 11/2018	Linkage with GRI indicators	SASB	Section
44.6a	Brief description of the group's business model (business environment, organization and structure): activities, brands, products and services; size of the organization.	GRI 102-1, GRI 102-2, GRI 102-7, GRI 102-18	6	
44.6a	Markets in which it operates: location of headquarters and location of operations	GRI 102-3, GRI 102-4, 102-6	6	
44.6a	Organizational objectives and strategies	GRI 102-14	6	
44.6a	Main factors and trends that may affect its future development	GRI 102-14, GRI 102-15	8	
	Stakeholder analysis: identification and communication channels	GRI 102-40, GRI 102-42, GRI 102-43, GRI 102-21	7	
	Materiality study: methodology and material aspects.		8	
Environmental Issues				
44.6d	Key environmental risks that affect the organization's business relationships, products or services that could have negative impacts, and how the group manages those risks, explaining the procedures used to identify and assess them. Information on impacts that have been identified, providing a breakdown of these, in particular on the main risks in the short, medium and long term.	GRI 102-15	8	
44.6b - 44.6c	Policies and commitments. due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts and for verification and control, including what measures have been taken.the results of those policies including key performance indicators	GRI 103-2	11	
Detailed general information				
44.6 -I-	Current and foreseeable effects of the company's activities on the environment and, where appropriate, on health and safety.	GRI 102-15	8	

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Article Law 11/2018	Spain Law 11/2018	Linkage with GRI indicators	SASB	Section
44.6 -I-	Environmental assessment or certification procedures		9	
44.6 -I-	Resources dedicated to environmental risk prevention	GRI 103-2	9	
44.6 -I-	Application of the precautionary principle	GRI 102-11	8	
44.6 -I-	Amount of provisions and guarantees for environmental risks		9	
Contamination				
44.6 -I-	Description of measures to prevent, reduce or remediate emissions that seriously affect the environment; taking into account any form of air pollution specific to the activity (Indicate emissions other than CO2eq, i.e. noise pollution, light pollution, odors, vibrations, particulate matter, NOx, SOx, CO, VOC, etc.).	GRI 305-7	8	
Circular economy and waste prevention and management				
44.6 -I-	Description of measures for prevention, recycling, reuse, other forms of recovery and waste disposal	GRI 306-1 al GRI 306-5	8	
44.6 -I-	Actions to combat food waste		n/a	
Sustainable use of resources				
44.6 -I-	Water consumption and water supply according to local constraints	GRI 303-5	8	
44.6 -I-	Consumption of raw materials and measures taken to improve the efficiency of their use	GRI 301-1, GRI 301-2, GRI 301-3	8	
44.6 -I-	Direct and indirect consumption of energy	GRI 302-1	8	
44.6 -I-	Measures taken to improve energy efficiency	GRI 302-4	8	
44.6 -I-	Use of renewable energies	GRI 302-1	8	

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Article Law 11/2018	Spain Law 11/2018	Linkage with GRI indicators	SASB	Section
Climate change				
44.6 -I-	Significant elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services that it produces	GRI 305-1, GRI 305-2, GRI 305-3	8	
44.6 -I-	Measures taken to adapt to the consequences of climate change	GRI 201-2	8	
44.6 -I-	Voluntary reduction targets established in the medium and long term to reduce greenhouse gas emissions and the means implemented to this end.	GRI 305-5	8	
Biodiversity protection				
44.6 -I-	Actions taken to preserve or restore biodiversity	GRI 304-3	8	
44.6 -I-	Impacts caused by activities or operations in protected areas	GRI 304-2	8	
Social and personnel issues				
44.6d	Main risks affecting the organization in terms of labor, equal treatment and opportunities between women and men, discrimination and inclusion of people with disabilities and universal accessibility. Explaining the procedures used to detect and evaluate them. Information on the impacts that have been detected, providing a breakdown of these, in particular on the main risks in the short, medium and long term.	GRI 102-15	10	
44.6b - 44.6c	Policies and commitments. due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and verification and control, including what measures have been adopted. The results of those policies including key performance indicators.	GRI 103-2	10	

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

Article Law 11/2018	Spain Law 11/2018	Linkage with GRI indicators	SASB	Section
Employment				
44.6 -II-	Number of employees by country	GRI 102-8	10	
44.6 -II-	Total number and distribution of employees by gender, age and professional classification	GRI 102-8, GRI 405-1	10	
44.6 -II-	Total number and distribution of types of employment contracts, average annual number of permanent contracts, temporary contracts and part-time contracts by sex, age and professional classification	GRI 102-8, GRI 405-1	10	
44.6 -II-	Number of dismissals by gender, age and occupational classification		10	
44.6 -II-	Average salaries and their evolution broken down by gender, age and professional classification or equal value.	GRI 405-2	10	
44.6 -II-	Wage gap, the remuneration for equal or average jobs in society	GRI 405-2	10	
44.6 -II-	The average remuneration of directors and executives, including variable remuneration, per diems, indemnities, payment of long-term savings systems and any other payment disaggregated by gender.	GRI 405-2	10	
44.6 -II-	Implementation of work disconnection policies	GRI 103-2	10	
44.6 -II-	Employees with disabilities	GRI 405-2	10	
Work organization				
44.6 -II-	Description of the organization of working time (shifts, overtime management, flexible working hours, etc.).	GRI 103-2	10	

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

Article Law 11/2018	Spain Law 11/2018	Linkage with GRI indicators	SASB	Section
44.6 -II-	Description of measures aimed at facilitating the enjoyment of work-life balance and encouraging the co-responsible exercise of work-life balance by both parents.	GRI 103-2	10	
		GRI 401-3		
44.6 -II-	Number of Absenteeism Hours	GRI 403-9	10	
Health and safety				
44.6 -II-	Description of health and safety conditions in the workplace	GRI 403-1 al GRI 403-7	10	
44.6 -II-	Occupational accidents, in particular their frequency and severity, as well as occupational diseases; disaggregated by sex.	GRI 403-9, GRI 403-10	10	
Social Relationships				
44.6 -II-	Description of the organization of social dialogue, including procedures for informing, consulting and negotiating with employees.	GRI 103-2	10	
44.6 -II-	Description of the balance of collective bargaining agreements, particularly in the field of occupational safety and health	GRI 403-4	10	
44.6 -II-	Percentage of employees covered by collective bargaining agreements by country	GRI 102-41	10	
Training				
44.6 -II-	Description of the policies implemented in the training field	GRI 103-2, GRI 404-2	10	

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Article Law 11/2018	Spain Law 11/2018	Linkage with GRI indicators	SASB	Section
44.6 -II-	Total number of training hours by professional category	GRI 404-1	10	
Universal accessibility for people with disabilities				
44.6 -II-	Universal accessibility for people with disabilities	GRI 103-2	10	
Equality				
44.6 -II-	Description of measures taken to promote equal treatment and opportunities for women and men	GRI 103-2	10	
44.6 -II-	Description of equality plans, measures adopted to promote employment, protocols against sexual and gender-based harassment, integration and universal accessibility for people with disabilities.	GRI 103-2	10	
44.6 -II-	Description of the policy against all types of discrimination and, if applicable, of diversity management.	GRI 103-2	10	
Respect for human rights				
44.6d	Key human rights risks faced by the organization, explaining the procedures used to identify and assess them. Information on identified impacts, including a breakdown of impacts, particularly on key short-, medium- and long-term risks.	GRI 102-16,GRI 412-1,GRI 412-2,GRI 412-3	10	
44.6b - 44.6c	Policies and commitments. due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and verification and control, including what measures have been adopted. The results of those policies including key performance indicators.		10	

About this Report

01.
Our Commitments to Sustainability

02.
Aspects Y2024 Sustainability Management Highlights

03.
Our Sustainability Commitments

04.
Disclosures ESRS 2 general information Basis for preparation

05.
Governance of the Sustainability

06.
Our Strategy and Business Model

07.
Our Stakeholders

08.
Materiality - Assessment Process

09.
Environmental Reporting ESRS E1 & E2

10.
Social Reporting ESRS S1, S2 Y S3

11.
Business Conduct ESRS G1

12.
Financial Reporting

Article Law 11/2018	Spain Law 11/2018	Linkage with GRI indicators	SASB	Section
Human rights				
44.6 -III-	Description of the implementation of human rights due diligence procedures; prevention of risks of human rights abuses and, where appropriate, measures to mitigate, manage and remedy possible abuses committed.	GRI 102-16, GRI 412-1, GRI 412-2, GRI 412-3	10	
44.6 -III-	Complaints of human rights violations	GRI 406-1	10	
44.6 -III-	Description of measures implemented to promote and enforce compliance with the provisions of the International Labor Organization's core conventions related to respect for freedom of association and the right to collective bargaining; the elimination of discrimination in respect of employment and occupation; the elimination of forced or compulsory labor; the effective abolition of child labor.	GRI 407-1, GRI 408-1, GRI 409-1	10	
Fighting corruption and bribery				
44.6d	Key risks to the organization regarding corruption and bribery, explaining the procedures used to detect and assess them. Information on identified impacts, including a breakdown of impacts, particularly on key short-, medium- and long-term risks.	GRI 102-15	11	
44.6b - 44.6c	Policies and commitments. due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and verification and control, including what measures have been adopted. The results of those policies including key performance indicators.	GRI 103-2	11	

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Article Law 11/2018	Spain Law 11/2018	Linkage with GRI indicators	SASB	Section
Corruption and bribery				
44.6 -IV-	Measures taken to prevent corruption and bribery	GRI 102-16, GRI 205-2, GRI 205-3	11	
44.6 -IV-	Measures to combat money laundering	GRI 102-16, GRI 205-2	11	
44.6 -IV-	Contributions to foundations and non-profit organizations	GRI 102-13, GRI 201-1, GRI 415-1	11	
Company information				
44.6d	Key risks to the organization’s commitment to sustainable development, subcontractors and suppliers, consumers, and tax information, explaining the procedures used to identify and assess them. Information on the impacts that have been identified, providing a breakdown of these, in particular on the main risks in the short, medium and long term.	GRI 102-15	8	
44.6b - 44.6c	Policies and commitments. due diligence procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts, and verification and control, including what measures have been adopted. The results of those policies including key performance indicators.	GRI 103-2	11	
Company commitments to sustainable development				
44.6 -V-	Description of the impact of the company’s activity on employment and local development (e.g., spending on suppliers, spending on local suppliers).	GRI 203-2, GRI 413-1	8,9,10,11	

About this Report

01. Our Commitments to Sustainability

02. Aspects Y2024 Sustainability Management Highlights

03. Our Sustainability Commitments

04. Disclosures ESRS 2 general information Basis for preparation

05. Governance of the Sustainability

06. Our Strategy and Business Model

07. Our Stakeholders

08. Materiality - Assessment Process

09. Environmental Reporting ESRS E1 & E2

10. Social Reporting ESRS S1, S2 Y S3

11. Business Conduct ESRS G1

12. Financial Reporting

Article Law 11/2018	Spain Law 11/2018	Linkage with GRI indicators	SASB	Section
44.6 -V-	Description of the impact of the company's activities on local populations and the territory.	GRI 413-1	8,9,10,11	
44.6 -V-	Description of the relations maintained with local community stakeholders and the modalities of the dialogue with them	GRI 102-43	6	
44.6 -V-	Information on partnership or sponsorship actions	GRI 413-1, GRI 201-1	10	
Subcontracting and suppliers				
44.6 -V-	Information on the inclusion of social, gender equality and environmental issues in the procurement policy.	GRI 103-2	11	
44.6 -V-	Description of how the social and environmental responsibility of suppliers is considered in their relationships with suppliers.	GRI 308-1, GRI 414-1	9,10,11	
44.6 -V-	Description of monitoring systems and supplier audits and results of these audits	GRI 308-2, GRI 414-2	11	
Consumers				
44.6 -V-	Description of measures for consumer health and safety	GRI 416-1	10	
44.6 -V-	Description of the complaint systems, complaints received and their resolution	GRI 103-2, GRI 418-1	10	
Tax information				
44.6 -V-	Profits obtained by country	GRI 201-1	12	
44.6 -V-	Taxes on profits paid (unearned)	GRI 201-1	12	
44.6 -V-	Public subsidies received	GRI 201-4	12	

About this Report

- 01.** Our Commitments to Sustainability
- 02.** Aspects Y2024 Sustainability Management Highlights
- 03.** Our Sustainability Commitments
- 04.** Disclosures ESRS 2 general information Basis for preparation
- 05.** Governance of the Sustainability
- 06.** Our Strategy and Business Model
- 07.** Our Stakeholders
- 08.** Materiality - Assessment Process
- 09.** Environmental Reporting ESRS E1 & E2
- 10.** Social Reporting ESRS S1, S2 Y S3
- 11.** Business Conduct ESRS G1
- 12.** Financial Reporting



TWG's Board of Directors (BoD) has considered and adopted **TWG's** Sustainability Report for the period from January 1 to December 31, 2024, ensuring quality, transparency and reflecting the importance for our company. The Y2024 Sustainability Report has been prepared by the Sustainability Director using the following data

quantitative and qualitative information provided by the heads of Environment, HR, Quality and Health and Safety, Purchasing and Finance in accordance with the principles set out in the reporting approach described above and provides a true picture of **TWG's** impact on society and the environment. Pamplona, March 20, 2025.

Board of Directors

Carlos Llonis
Virginia Michelena
Alfredo Llonis
Jesús Sanz
Vicente Tamarit

—

CSO - Chief Sustainability Officer:

Débora Villecco

—

Sustainability Committee-CSOS:

Virginia Michelena — VP y CHRO TW Group
Blanca Pizarro — Controller TW Automotive
Joseba Saez — HQSE Manager TW Automotive
Javier Martinez — HQSE Manager TW Logistics
Daniel Sánchez — Purchasing Manager TW Automotive
Jose Pulido — Responsable de RRHH

—

Contact TW Group

Sustainability Committee- CSOS **TWG**

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Verificaciones

DECLARACIÓN DE VERIFICACIÓN



Declaración de Verificación Independiente del Estado de Información No Financiera de TRUCK AND WHEEL GROUP S.L. y sociedades dependientes del ejercicio 2024.

A los socios/órgano de administración de TRUCK AND WHEEL GROUP S.L.

De acuerdo con el artículo 49 del Código de Comercio, hemos realizado la verificación, con el fin de asegurar la fiabilidad del Estado de Información No Financiera (en adelante EINF) correspondiente al ejercicio anual finalizado el 31 de diciembre de 2024, de TRUCK AND WHEEL GROUP S.L., (en adelante "la organización") y sus sociedades dependientes que forme parte de su Informe de Gestión consolidado del mismo ejercicio.

El contenido del Informe de Gestión consolidado incluye información adicional a la requerida por la normativa mercantil vigente en materia de información no financiera que no ha sido objeto de nuestro trabajo de verificación. En este sentido, nuestro trabajo se ha limitado exclusivamente a la verificación de la información identificada en el **ÍNDICE DE CONTENIDO** incluido en el citado Estado de Información No Financiera.

Responsabilidad de la Dirección

La dirección de la organización es responsable de la preparación, del contenido y de la presentación del EINF, según la Ley 11/2018, de 28 de diciembre. Esta responsabilidad incluye el diseño, la implementación y el seguimiento del control interno que se considere necesario para permitir que el EINF esté libre de insuflación material. El EINF se ha preparado de acuerdo con los criterios recogidos en la normativa mercantil vigente, seleccionados de acuerdo con lo mencionado para esta materia en **ÍNDICE DE CONTENIDO**, del citado EINF.

Además, la dirección de la organización es responsable de definir, implementar, aplicar y mantener los sistemas de gestión de los que se obtiene la información necesaria para la preparación del EINF, así como para el seguimiento del grado de cumplimiento de requisitos exigidos en la Ley 11/2018, de 28 de diciembre.

Independencia y Competencia

El equipo auditor ha cumplido los requerimientos de independencia, imparcialidad y demás obligaciones de EISA, basándose sus actuaciones en los principios fundamentales de: integridad, objetividad, competencia y diligencia profesional, confidencialidad y comportamiento profesional.

EQA es un prestador independiente de servicios de verificación tal y como se define en la Ley 11/2018.

Número: 12850

Fecha de Verificación: 14 / 04 / 2025

Página 1 de 3

European Quality Assurance Spain, S.L. (EQA España) - Calle Jacinto Benavente 2 / 1ª Planta (Edificio Severo) (28028 Madrid)
Queda sujeta al "Procedimiento de Certificación y Condiciones Generales" establecido por EISA

DECLARACIÓN DE VERIFICACIÓN



Objetivo de la verificación

El objetivo de la verificación es asegurar que la información reportada por la organización en el Estado de Información No Financiera de TRUCK AND WHEEL GROUP S.L., de 14/04/2025 es precisa, completa, transparente y libre de errores u omisiones.

Nuestra responsabilidad

La responsabilidad de EQA se circunscribe en expresar nuestras conclusiones en una declaración de verificación independiente de seguridad limitada, basada en los procedimientos realizados y en las evidencias que se han obtenido. El encargo se ha realizado de acuerdo con una metodología propia y los requisitos de la Norma Internacional UNE-EN ISO/IEC 17029 "Evaluación de la conformidad. Principios generales y requisitos para los organismos de validación y verificación".

El alcance de un encargo de seguridad limitada es intrínsecamente inferior al de un encargo de seguridad razonable y, por lo tanto, la seguridad proporcionalmente menor.

Los procedimientos realizados se basan en el juicio profesional de los expertos que han intervenido en el proceso e incluyen entrevistas, observación de procesos, evaluación de documentación, procedimientos analíticos, y pruebas de revisión por muestra que, con carácter general, se describen a continuación:

- Reuniones con el personal de los diversos departamentos de la Organización involucrados para conocer el modelo de negocio, las políticas y los enfoques de gestión aplicados, los principales riesgos relacionados con esas cuestiones y obtener información necesaria para la revisión.
- Comprobación de los registros de los que dispone la organización para demostrar su cumplimiento con los aspectos materiales en relación con sus actividades.
- Análisis de los procedimientos utilizados para recopilar y validar los datos e información presentada en el EINF.
- Análisis de la adaptación del EINF a lo señalado en Ley 11/2018.
- Comprobación de datos, en base a la selección del una muestra, y realización de pruebas sustantivas de la información cuantitativa y cualitativa contenida en el EINF.

Número: 12850

Fecha de Verificación: 14 / 04 / 2025

Página 2 de 3

European Quality Assurance Spain, S.L. (EQA España) - Calle Jacinto Benavente 2 / 1ª Planta (Edificio Severo) (28028 Madrid)
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DECLARACIÓN DE VERIFICACIÓN



Conclusiones de la Verificación

Como resultado de los procedimientos que se han realizado y de las evidencias obtenidas, se ha llegado a nuestro conocimiento ninguna cuestión que nos lleve a pensar que la información contenida en el EINF de TRUCK AND WHEEL GROUP S.L. y sus sociedades dependientes correspondiente al ejercicio anual finalizado el 31/12/2024, no está presentada de manera adecuada, ni que existan derivaciones ni omisiones materiales que nos haga pensar que el informe no cumple los requisitos de la Ley 11 del 2018 recogidos en **ÍNDICE DE CONTENIDO**, del citado EINF.

Uso y distribución

La presente Declaración de Verificación se envía a la dirección de TRUCK AND WHEEL GROUP S.L., de acuerdo con los términos del contrato suscrito entre ambas partes.

Esta declaración ha sido preparada en respuesta al requerimiento establecido en la normativa mercantil vigente en España, por lo que podría no ser adecuado para otros propósitos y jurisdicciones.



Roberto Martínez Gómez
Director de Verificación

Número: 12850

Fecha de Verificación: 14 / 04 / 2025

Página 3 de 3

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