EINF 2025

SUSTAINABILITY REPORT

TW Group

CREATING POSITIVE IMPACT.

contents

About this Report

TRUCK AND WHEEL GROUP S.L and its subsidiaries (hereinafter TWG) presents its Sustainability Report (EINF) to inform its Stakeholders about its performance in this area, in line with its commitment to transparency. The Report is also prepared in compliance with Law 11/2018 of 28 December, which amends the Commercial Code, the revised text of the Capital Companies Act approved by Royal Legislative Decree 1/2010 of 2 July, and Law 22/2015 of 20 July on Auditing of Accounts, with regard to non-financial information and diversity. This Report includes information on **TWG**, the parent company of a group of subsidiaries, consolidated in the logistics sector through its division **TRUCK & WHEEL LOGISTICS S.L.** (hereinafter **TWL**) and in the automotive components sector through its division **TRUCK & WHEEL AUTOMOTIVE S.L.** (hereinafter **TWA**). The Consolidated Annual Accounts - Consolidated Management Report for the year ended 31 December 2025 details the companies in which TWG holds direct or indirect ownership interests. It should be noted that TWG owns 83.99% of Setland S.L. and 100% of Toldos Araba S.L. Both companies are fully consolidated and the annual accounts reflect these operations. Environmental and social indicators are therefore included for both companies. This is the **5th Report** presented by TWG, covering the calendar year and fiscal year from **01/01/2025 to 31/12/2025** and reports in detail on its progress in non-financial matters (environmental, social and governance). For 2025, 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). To also meet the requirements of Law 11/2018, the Global Reporting Initiative (GRI) Standards have been used as a reference framework, with reporting focused on the topics identified as material. This Report has been prepared by the Sustainability Committee (CSOS), comprising representatives from the company's key areas and the Board.

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

Dear Reader,

2025 was a year of growth and consolidation for Truck & Wheel Group, during which we continued to advance the development of our business model and the integration of sustainability as one of its strategic pillars.

This year, we have also worked around a clear idea that has guided our decisions and priorities: creating positive impact.

During the year, the Group strengthened its international presence by entering a new country, Australia, bringing our operations to nine countries and our workforce to more than 2,200 professionals. This growth has been accompanied by a deliberate effort to expand in an orderly, responsible way aligned with our long-term commitments.

In an increasingly demanding environment, we continued to integrate ESG criteria into the Group's management. Sustainability is embedded in our decision-making processes, risk management and the way we operate across our different markets.

On the environmental front, we continued to develop our decarbonisation roadmap, advancing the measurement of our carbon footprint across all three scopes and improving the energy efficiency of our operations. In this context, the Group now has an audited five-year Decarbonisation Plan that sets out a clear, measurable emissions-reduction pathway and reinforces our commitment to the transition towards a low-carbon model.

From a social perspective, we strengthened our commitment to people, with a particular focus on occupational health and safety and talent development. During the year, we continued to increase our training efforts, consolidating a culture of prevention and continuous improvement throughout the organisation. We also continued to promote inclusive and diverse workplaces, consistent with our values and the Group's international presence.

Our Foundation continued to play an important role in generating social impact, primarily by promoting educational and cultural initiatives.

In governance, we strengthened our regulatory and compliance framework and improved our control and risk-management systems, progressively incorporating ESG considerations.

During the year, the Group continued to align its reporting system with the requirements of the CSRD and the European Sustainability Reporting Standards (ESRS), strengthening the quality, consistency and traceability of the information reported.

All of this reflects a shared vision: to continue growing sustainably, creating positive impact and long-term value for our stakeholders and the communities and environments in which we operate.

I would like to thank everyone who is part of Truck & Wheel Group, as well as our customers, suppliers and partners, for their commitment and trust.

Sincerely,

Carlos Llonis

President, TWG

Our Commitments to Sustainability

01

1. Our Commitments to Sustainability

In 2023, the Group conducted its first double materiality assessment to identify the environmental, social and governance (ESG) matters most relevant to its activities and stakeholders.

The process assessed 175 IROs (Impacts, Risks and Opportunities) associated with the Group's activities, considering both the impact of our operations on the environment and society and the risks and opportunities that ESG factors may represent for the business.

As a result, 10 material topics were identified. Since 2023, these have formed the basis of our sustainability strategy and guide the management and reporting priorities addressed in this Report.

The material topics identified are as follows:

↘ **Environmental:** Our commitment focuses on reducing the environmental impact of our operations and moving towards a more efficient and responsible model.
Material topics: Climate change, energy and waste management.

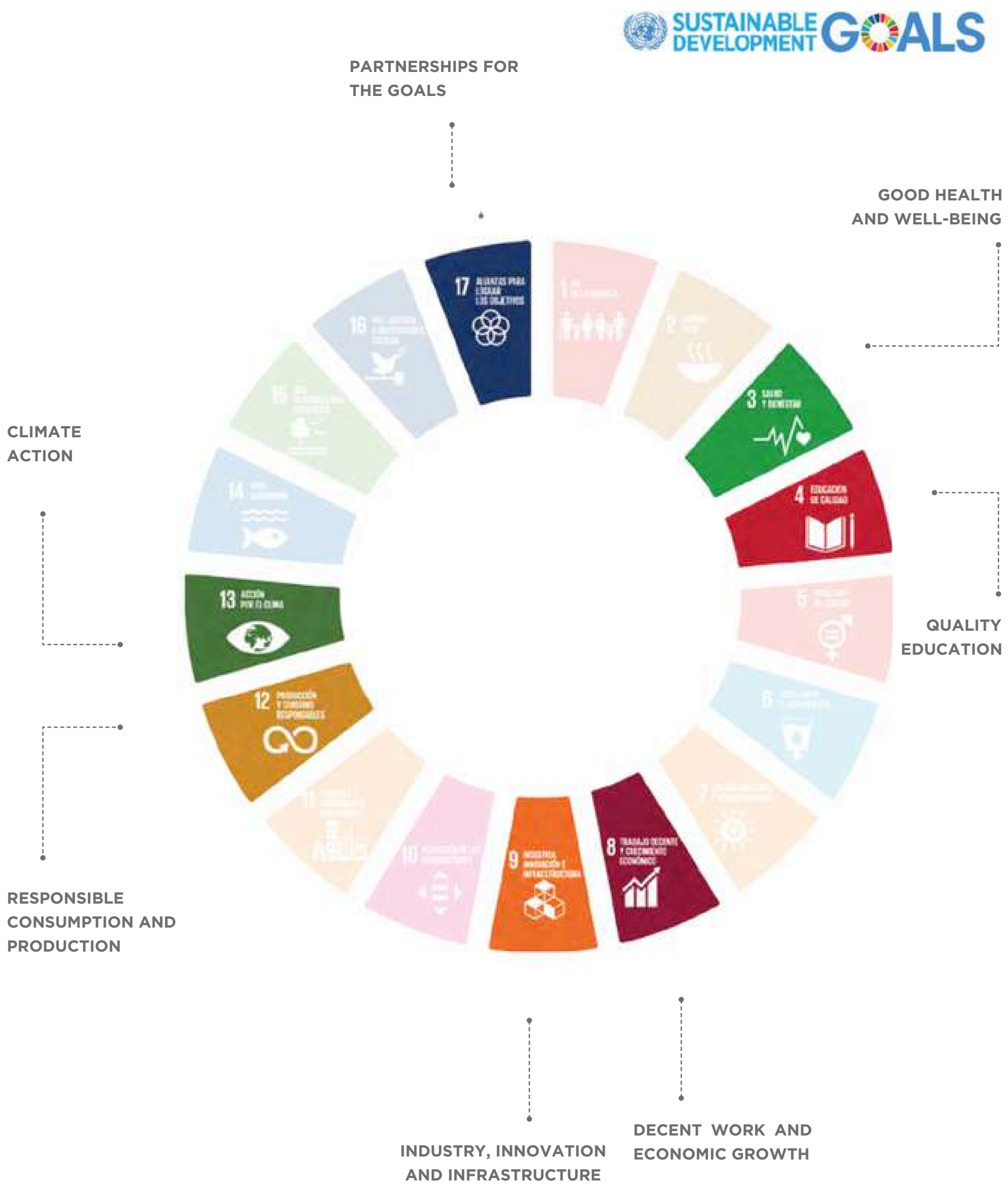
↘ **Social:** The Group places people at the heart of its activities, promoting safe workplaces, talent development and respect for rights throughout the value chain.
Material topics: Occupational health and safety, talent development, data protection, working conditions in the value chain and customer satisfaction.

↘ **Governance:** The Group promotes responsible management based on business ethics, transparency and information protection.
Material topics: Corporate culture and business ethics (anti-corruption and anti-bribery) and cybersecurity.

Since it was developed in 2023, the **double materiality assessment** has served as a **guide for the Group's ESG strategy**, enabling us to:

- guide the management of sustainability risks and opportunities
- define objectives and priority action areas
- structure theinformation includedin this Non-FinancialInformationStatement

The following sections of the Report describe the policies, measures and results associated with each of these areas.



Sustainability Management Highlights Y2025

02

2. Sustainability Management Highlights Y2025

ALIGNMENT WITH CSRD AND ESRS AND STRENGTHENING ESG REPORTING

During 2025, the Group continued to make progress in progressively aligning its reporting system with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), consolidating the approach initiated in the previous year.

In this context, the double materiality assessment was reviewed in greater depth, strengthening its integration into management and decision-making processes. The Sustainability Report also continued to evolve in structure and content, improving the quality, consistency and traceability of the information reported.

During the year, further progress was made in due diligence processes, with a particular focus on the supply chain and the management of human-rights-related risks, thereby strengthening the Group's approach to more robust, integrated management aligned with European best practices.

DRIVING THE DECARBONISATION PLAN AND EXTERNAL RECOGNITION

The Group continued to integrate environmental sustainability into its management, notably through the definition and implementation of its **Decarbonisation Plan**, which sets out a structured roadmap for the progressive reduction of its carbon footprint. In recognition of these efforts, the Group received the **Lean & Green Award from AECOC**, recognising the progress made in reducing emissions and improving logistics efficiency.

PROGRESS IN DECARBONISING OWN OPERATIONS

In line with its energy transition strategy, during 2025 the Group expanded the procurement of electricity from renewable sources across a greater number of operating sites. This measure contributes to reducing indirect emissions (Scope 2) and reinforces the Group's commitment to improving its environmental performance and adopting a more sustainable energy model.

IMPROVEMENTS IN PEOPLE MANAGEMENT AND OCCUPATIONAL SAFETY

In the social sphere, strategic initiatives were implemented to strengthen people management and occupational safety, notably the introduction of a new HR and Occupational Risk Prevention management system and the rollout of the OES (Operational Excellence System) project, aimed at continuously improving operational processes and developing talent.

STRENGTHENING THE COMPLIANCE FRAMEWORK AND CORPORATE GOVERNANCE

During the year, the Group continued to consolidate its regulatory framework by drafting and updating key corporate policies, including the Conflict of Interest Policy, Digital Disconnection Policy, Gifts and Invitations Policy, Sustainable Travel Policy and Data Protection Policy. Progress was also made in analysing and managing the company's criminal risks, strengthening the compliance system.

SYSTEMATISATION AND IMPROVEMENT OF SUSTAINABILITY REPORTING

The Group continued to develop its internal sustainability platform, improving the systematisation, traceability and monitoring of key performance indicators (KPIs), and adapting reporting processes to new regulatory requirements.

EXTERNAL SUSTAINABILITY ASSESSMENT: ECOVADIS

During the year, the Group was assessed by EcoVadis as part of its commitment to transparency, continuous improvement and alignment with international ESG standards. This process enables TWG to identify areas for improvement and strengthen its sustainability positioning with customers and stakeholders.

+2.000
Employees

68%
Permanent Contracts

83%
FullTime

+16%
Training Hours

+20.74%
Revenue vs. Y2024

9
Countries

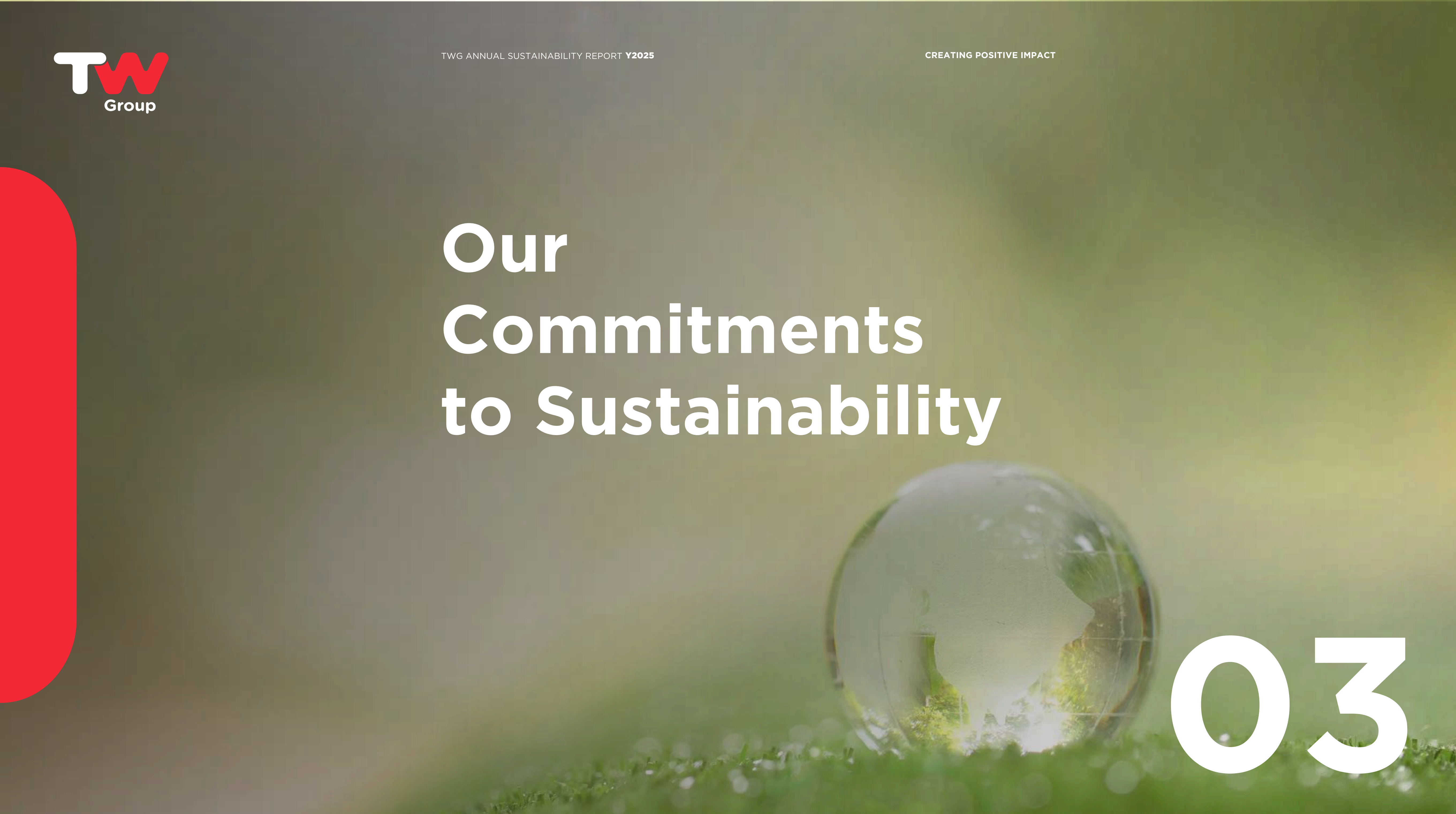
5
Plants

32
Hubs

A rated Supplier
for all TWA customers

212.163,94 t
CO2 Scopes 1, 2 &3

+137 %
Renewable Energy Consumption



Our Commitments to Sustainability

03

TW Group

	ENVIRONMENT	PEOPLE		RESPONSIBLE BUSINESS
ESG PRIORITY	E1 D EMISSIONS REDUCTION / ENERGY EFFICIENCY	S1 OWN WORKFORCE		G1 BUSINESS CONDUCT
MATERIAL ESG TOPICS AND SDGs	9, 12, 13, 17 Climate change Pollution	8 Working conditions and rights related to employment	3 Occupational Health and Safety	17 Culture of ethics and compliance and cybersecurity.
KEY AMBITIONS	• Drive the decarbonisation of logistics and production operations	• Be a diverse, inclusive company that promotes training, talent development and Occupational Health and Safety		• Be a benchmark organisation for compliance culture, ensuring the highest standards of integrity, compliance and cybersecurity in all our decisions and operations
KEY OBJECTIVES	• Scope 1: Reduce fuel consumption of company-owned vehicles by 10% • Scope 2: Purchase renewable electricity for the German plant • Scope 3: Increase renewable raw materials by 10% / Reduce waste by 10% / Reduce business travel by 15% / Use HVO in 15% of logistics vehicles	• Increase the percentage of women in • decision-making positions by 10% • Increase training hours by 10% • Increase the inclusion of people with • special abilities by 10%	by 10% • Reduce workplace accidents and occupational illnesses • Increase training hours in occupational health and safety by 10%	• Zero complaints concerning bribery and corruption/fraud, harassment and discrimination, or any other breach of the Code of Ethics or Supplier Code of Ethics • Begin sustainability assessments of critical suppliers • Train strategic suppliers on the TW Group Supplier Code of Ethics • Design a digitalised supply-chain risk management model • EcoVadis assessment • Creation of TW Connect • Progress the Group criminal risk matrix • ISO 27001 certification (2026). Train 100% of our workforce on the Code of
LONG-TERM GOALS	• Achieve a significant reduction in total GHG emissions over a five-year horizon through implementation of the Decarbonisation Plan and the progressive adoption of low-carbon logistics solutions, renewable energy and circular-economy measures	• A 10% annual decrease in turnover through 2027	• Zero serious injuries and fatalities over the next two years	Ethics and associated policies (Anti-Corruption, Human Rights, Inclusion, Diversity and Equality (IDE), Cybersecurity, Data Protection and Sustainability). Continue assessing sustainability in the supply chain (purchasing). Embed a compliance culture across the Group.
PROGRESS 2025	• Scope 1: the target was not achieved, mainly due to the increase in the fuel-powered fleet (+14.6%), although employee awareness initiatives will continue • Scope 2: the target to procure renewable electricity for the Pilsting plant was achieved, increasing the renewable share from 16.2% (2024) to 41.3% (2025) • Scope 3: • - Total waste generation decreased by 2.1% and waste sent for disposal fell by 12.5% • - The share of recycled raw materials increased to 46.57% (39.38% in 2024), an improvement of +7.19 p.p. and +18.3% in relative terms • - Business travel decreased by 20.8% compared with 2024 (2,150 vs 2,715) • - Progressive rollout of HVO fuel, accounting for 1.20% of kilometres travelled in 2025	• Increase in the percentage of women in decision-making positions to 25.80% Increase in the number of people with disabilities by 30% Increase in training hours by 4%	• Occupational health and safety training hours increased by 16% • The target of reducing accidents by 10% was not achieved due to the first-time inclusion of accidents from investee companies. Comparing the same companies in 2025 and 2024 would have resulted in an 18% reduction in lost-time accidents •Environment and Sustainability training hours increased by 4.9%	• The following policies were developed: Conflict of Interest Policy, Digital Disconnection Policy, Gifts and Invitations Policy, Sustainable Travel Policy, renewed Data Protection Policy, Acceptable and Professional Use of Assets Policy and AI Use Governance Standard. • Purchasing departments were trained on the Sustainable Purchasing Policy • Critical suppliers were assessed on sustainability matters. • We began training our most critical suppliers on the TW Group Supplier Code of Ethics
GOALS Y2026	• Scope 1: reduce the carbon footprint by 3% (tCO2/M€) through: • - Stationary sources: -3% • - Mobile sources: -3% • - Air conditioning (refrigerants): -10% • Scope 2: reduce the electricity-consumption footprint by 8% (kWh/M€), focusing on the Mexico and USA sites • Scope 3: reduce the footprint by 4% (tCO2/M€), with the following targets: • - Cat. 1: -2% in purchased goods/services • - Cat. 3: -3% in production of fossil fuels and electricity • - Cat. 4: -4% in upstream transportation • - Cat. 5: -5% in waste management • - Cat. 6: -10% in business travel • - Cat. 7: -5% in employee commuting	• Increase the percentage of women in decision-making positions by 10% •Increase strategic training hours by 30% •Increase the number of performance evaluations by 50% •Conduct exit interviews with 100% of voluntary departures to understand thereasons for turnover. •Increase the inclusion of people with disabilities by 10% •Reduce turnover by 10% •Complete the implementation of the HR management and OES program	• Reduce workplace accidents and occupational illnesses by 10% • Increase occupational health and safety training hours by 30% • Further develop the Driving Wellness Together (DWT) campaign, expanding its reach and promoting new initiatives	• Zero complaints concerning bribery and corruption/fraud, harassment and discrimination, or any other breach of the Code of Ethics or Supplier Code of Ethics • Increase strategic training in cybersecurity, Human Rights, data protection and sustainability by 30% • Complete the criminal risk map for Australia and USA Logistics • ISO 27001 certification • Increase supply-chain risk assessments of our most critical suppliers by 30% • Increase sustainability assessments of our most critical suppliers by 30% • Increase compliance and sustainability training by 30% • Improve the ECOVADIS score • Join Forética

ESRS 2 General Disclosures

04

4. ESRS 2 General Disclosures.

Basis for preparation.

ESRS 2 BP-1

GENERAL BASIS FOR PREPARING THE SUSTAINABILITY STATEMENT

This Sustainability Report has been prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) adopted by the European Commission. The sustainability statement covers the Group's own operations and its value chain, both upstream and downstream.In line with the approach adopted in the previous year, the Group has continued to progress in the gradual application of CSRD and ESRS requirements, consolidating its commitment to continuously improving the quality, consistency and comparability of the information reported.

Given its size, activities and international presence, TWG remains committed to anticipating the regulatory framework by applying the requirements of the Directive and the ESRS relevant to the 2025 financial year progressively and proportionately.

The preparation of this Report also fulfils the obligations established in Law 11/2018, consistently integrating national and European requirements on non-financial and sustainability information.

During the year, the Group continued to strengthen its internal processes for reporting, control and validation of ESG information, moving towards a more structured and integrated management model aligned with European best practices.

TWG considers that the early, progressive and structured application of the ESRS strengthens the transparency, consistency and comparability of the information reported, improves accountability to stakeholders and consolidates sustainability as a strategic pillar of the business model.

At the end of this Report, a contents table provides details of the degree of application of the corresponding regulatory requirements.

ESRS 2 BP-2

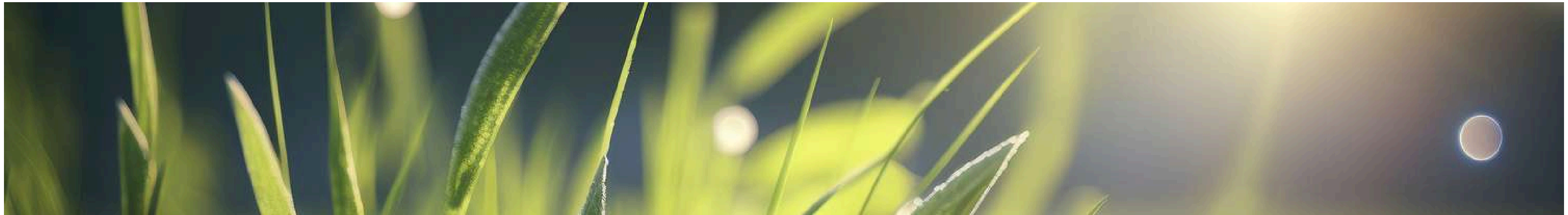
DISCLOSURES RELATING TO SPECIFIC CIRCUMSTANCES

The sustainability statement incorporates the results of the **doublematerialityassessment** (Double Materiality Assessment, DMA), through which the relevant impacts, risks and opportunities associated with the Group's activities have been identified and assessed. This process covers both own operations and the value chain and is described in detail in section IRO-1.

The Group's corporate and compliance policies also extend to its value chain and are described in the corresponding sections of this Report.

For comparative purposes, the 2024 Sustainability Report, prepared in accordance with GRI Standards and Law 11/2018, has been taken into consideration.

Greenhouse Gas (GHG) emissions accounting has been updated and expanded to reflect the Group's current reality.



Sustainability Governance

05

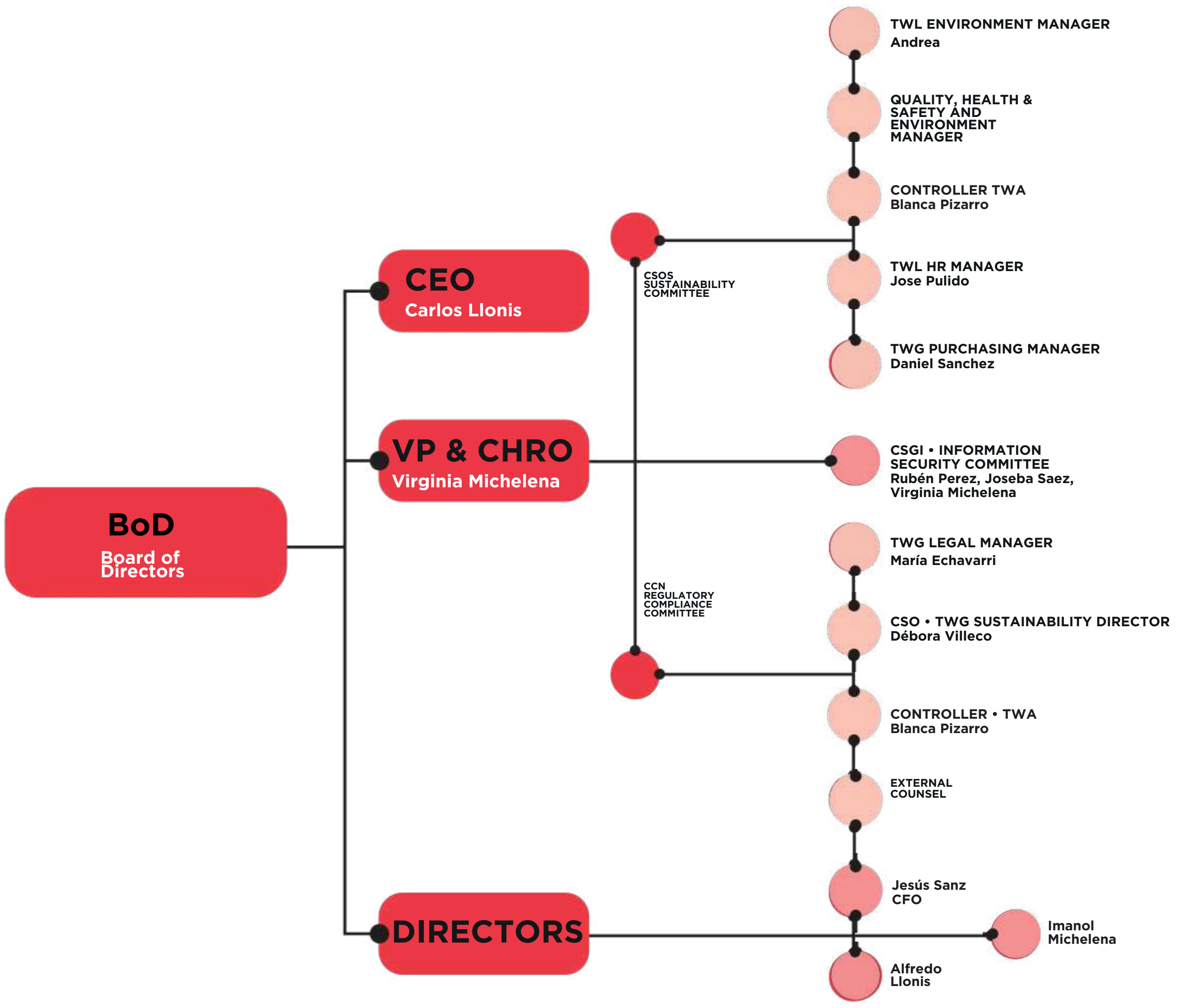
5. Sustainability Governance.

ESRS 2 GOV-1

↘ ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Effective sustainability governance ensures that decisions are based on accurate and relevant information, promoting transparency and accountability. The governing bodies that oversee and ensure the implementation of **Sustainability** at **TWG** are shown in the following chart and explained in greater detail below:

Through the involvement and oversight of the VP & CHRO, the Board of Directors (BoD) delegates the management of these matters to the Sustainability area. She communicates the strategy to the area through her participation in the CSOS and ultimately approves the initiatives and objectives defined by the Committee, thereby ensuring the required independence, diversity of thought and technical approach.



ORGANISATIONAL CHART OF MANAGEMENT AND GOVERNANCE BODIES

The Board of Directors (BoD) is responsible for approving budgets and overseeing the Group's strategy, including the analysis of global business and market trends and the identification and assessment of associated risks.

Based on the periodic information received from the various Committees, the BoD assesses the performance of key areas and the business as a whole, as well as the effectiveness of internal control and risk-management systems. Based on this analysis, it establishes strategic guidelines and recommendations.

The Board also defines short-, medium- and long-term objectives, integrating stakeholder relations and the suitability of the communication channels used into its decision-making.

SHAREHOLDERS' MEETING

					
	Carlos Llonis Irigoyen **President**	Virginia Michelena Iturria **Vice President & CHRO**	Alfredo Llonis Irigoyen **Board Member**	Vicente Tamarit **Board Member**	Jesús Sanz Lopez **Board Member**
Age	49 years old	48 years old	48 years old	69 years old	47 years old
Specific training and specialisation	Industrial Organisation Engineer University of Navarra	Degree in Economics, University of Navarra Master's in Commercial Management	Business Administration University of Deusto	Commercial Management & Marketing ESIC Valencia	Economics & Business Administration University of Navarra
Skills & Competencies	International organisation and management experience. Investment optimisation.	Strategic HR and business management experience in transport companies.	International organisation and management experience, including opening new markets.	30+ years' experience in logistics, commercial and fleet management.	Strategic management and administrative/financial control. Largescale ERP projects.
Committee Member / Position	Chair, TWA Executive Committee	CHRO · Chair, CSOS CSGI Member · Chair, CCN	Chair, TWL Executive Committee		CFO TWG

BoD [Board of Directors]

ESRS 2 GOV-1

↘ INFORMATION PROVIDED TO THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES AND SUSTAINABILITY MATTERS ADDRESSED BY THEM

Board of Directors

The Board of Directors (BoD) comprises the President, the Vice President and three directors.

The BoD is the highest body responsible for defining, overseeing and monitoring the Group's strategy, including its sustainability strategy, control systems and overall risk management, explicitly integrating the risks and opportunities associated with environmental, social and governance (ESG) factors.

TWG's Vice President actively participates in meetings of the Sustainability Committee

(**CSOS)** and the Regulatory Compliance Committee **(CCN)**, monitoring the performance of initiatives, assessing material impacts, risks and opportunities, and reviewing the evolution of key indicators. Relevant information is subsequently reported to the Board of Directors, ensuring appropriate oversight and facilitating informed decision-making.

The Board of Directors receives regular information on sustainability performance through the Vice President, enabling continuous monitoring of the main indicators, risks and strategic initiatives in this area.

The Board also defines stakeholder relations and communication channels and approves both the overall sustainability strategy and the content of the Annual Report.

Board members have extensive professional experience and solid backgrounds in areas such as finance, engineering and human resources, enabling a comprehensive approach to decision-making. The Board has **20% female representation and 20% proprietary or external directors.**

The Board of Directors' skills and training profile is detailed in Section G1.

In summary, the Board of Directors delegates the operational management of sustainability to the Sustainability Committee (CSOS), while at all times retaining its role in overseeing, controlling and approving initiatives, objectives and results in this area.

The Board promotes the integration of sustainability into the Group's strategy, ensuringthat ESGprinciplesareprogressivelyincorporatedintodecision-making andlong-term businessdevelopment . It also oversees the integration of ESG risks and opportunities into the overall risk-management system, ensuring their appropriate identification, assessment and monitoring.

Key sustainability activities of the Board of Directors during the period

During the year, the Board of Directors played an active role in overseeing and advancing the Group's sustainability strategy, with the following key actions:

- **Review** of the **strategy and business plan**, including the definition of a new expansion model aimed at increasing production capacity and creating quality employment.
- **Strengthening cybersecurity governance** through the creation and development of the Information Security Committee, responsible for reviewing the cybersecurity policy, the evolution of the Group ERP system and progress towards new information-security certifications.
- **Strengthening** the risk control and management system through the creation of an **in-house legal function,** with a particular focus on identifying, assessing and mitigating risks, including criminal risks.
- **Approval** of the update to the corporate **criminal risk matrix**, with support from external advisers.
- **Promotion** of improvements to the **internal sustainability management platform**, aimed at strengthening the visualisation, traceability and monitoring of ESG indicators.

- **Approval** of **key corporate policies** on sustainability, prepared by the Sustainability Department and reviewed by the Regulatory Compliance Committee.
- **Approval** of **updated sustainability content on the corporate website**, strengthening communication and transparency with Stakeholders.
- **Approval** of the **Decarbonisation Plan** presented to AECOC, as part of the Group's commitment to reducing emissions and transitioning towards a low-carbon model.
- **Support** for the Sustainability Committee (CSOS) initiative to submit the Group to an external sustainability assessment through **EcoVadis.**

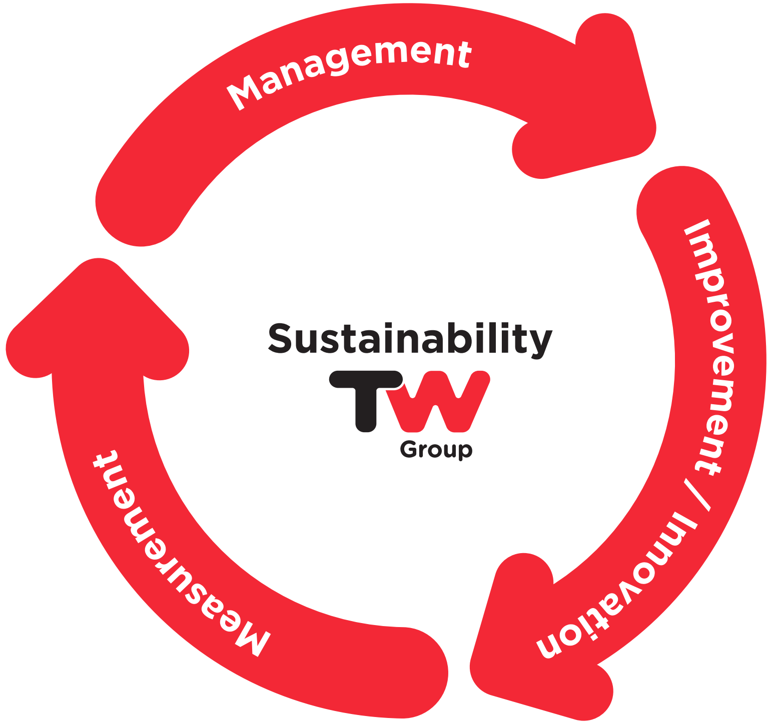
Sustainability objectives established by the Board of Directors for 2026

- **Obtaining ISO 27001 certification** in the first half of 2026, strengthening the information security management system.
- **Strengthening the Compliance system** through comprehensive systematisation and monitoring of company risks.
- **Improving** the result obtained in the **EcoVadis assessment**, as part of the commitment to continuous improvement in ESG performance.
- **Increasing** the number of operating sites supplied with **electricity from renewable sources.**
- **Continue working** towards the objectives established to obtain the **first Lean & Green Star** within the Decarbonisation Plan over the next five years.

Sustainability Committee (CSOS)

The Sustainability Committee (CSOS) is a multidisciplinary team comprising representatives responsible for Environment, Quality, Occupational Health and Safety, Purchasing, Finance and HR, and is led by the Group's Vice President.

Its main role is to support the coordinated management and oversight of sustainability throughout the organisation, ensuring that ESG principles are integrated across the Group's different areas.



"The TWG Sustainability Committee is a global, multidisciplinary body that takes action to meet short- and long-term goals."

its main responsibilities include:

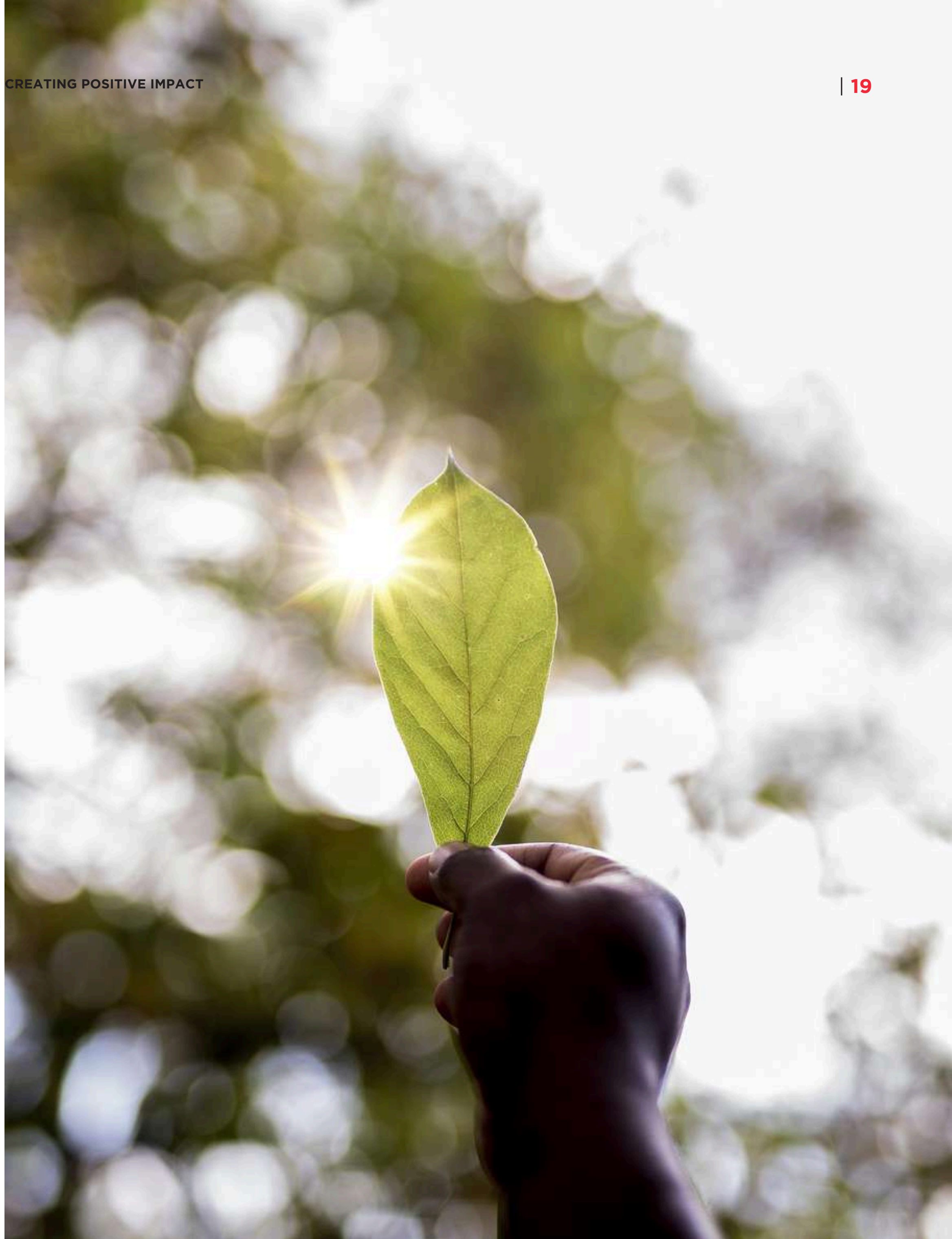
- **Collecting,** monitoring and assessing qualitative and quantitative sustainability information.
- **Periodically** sharing this information to identify opportunities for improvement and define annual objectives.
- **Implementing** agreed initiatives, ensuring their correct execution, monitoring and transparency.
- **Collecting** and validating evidence for key performance indicators (KPIs), ensuring their reliability and traceability for verification and audit processes.
- **Monitoring** and reporting on risks associated with their respective areas of responsibility.
- **Addressing** business needs and the requirements of customers and other stakeholders regarding sustainability.

The integration of sustainability into TWG's strategyi sastrategic enabler of the Group's growthandakey elementincreating long-termvalue . The Group progressively integrates ESG impacts, risks and opportunities into its business model, decision-making processes and strategic planning.

This approach is reinforced by the direct involvement of the Board of Directors, where sustainability is a structural part of the agenda. In particular, the **participation of the Board's Vice President in the Sustainability Committee (CSOS)** ensures the natural and seamless integration of these matters into the Group's overall strategy.

Atthe monthlymeetingsof the BoardofDirectors,theVice Presidentsystematically reports keymattersrelating to sustainabilityandregulatory compliance , including regulatory trends, developments in the regulatory framework, ongoing initiatives, emerging risks and main concerns. This continuous flow of information enables the Board to make informed decisions and consistently steer the company's strategic direction.

This governance model ensures alignment between operational performance and sustainability objectives strengthening business resilience, risk management and the ability to adapt to a constantly evolving regulatory and competitive environment.



HOW SUSTAINABILITY IS INTEGRATED INTO INCENTIVE SCHEMES

ESRS 2 GOV-3

INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE INTO INCENTIVE SCHEMES

TWG integrates sustainability performance into the incentive schemes of Sustainability Committee (CSOS) members, linking part of their assessment to annual progress against the objectives and action plans defined in this area.

This approach strengthens the alignment between decision-making and the Group's ESG commitments, encouraging concrete measures aimed at achieving strategic sustainability objectives.

DUE DILIGENCE STATEMENT

ESRS 2 GOV-4

DUE DILIGENCE STATEMENT FOR THIS SUSTAINABILITY REPORT.

TWG applies a sustainability due diligence process aimed at identifying, preventing and managing the impacts, risks and opportunities associated with its activities and value chain.

This process is based on the identification and prioritisation of material ESG topics, defined through the Group's double materiality assessment, and is progressively integrated into the organisation's management and control systems.

The priority due diligence areas correspond to the Group's main material topics, including climate change and energy, waste management, occupational health and safety, equal opportunities and talent development, data protection and cybersecurity, working conditions in the value chain, as well as business ethics and corruption prevention.

In these areas, the Group develops measures aimed at preventing and mitigating the identified risks and impacts through the implementation of corporate policies, operational procedures, internal controls and specific environmental, social and governance management programmes. Information on the policies, actions and results associated with these areas is provided in detail in the relevant sections of this Sustainability Report.

InThe Group also periodically monitors these risks and impacts using indicators, internal reviews and control mechanisms.

The following table shows how the main material topics identified by the Group are integrated into the due diligence process and the management mechanisms applied.

Material topic	Main impacts or risks identified	Main due diligence measures
Climate change and energy	Emissions associated with logistics operations and energy consumption at facilities	Energy-efficiency programmes, energy-consumption monitoring, emissions-reduction measures and improved operational efficiency
Waste management	Waste generated by operational activities	Waste-management procedures, segregation and waste control at facilities
Occupational health and safety	Risk of workplace accidents in logistics operations and warehouses	Occupational risk prevention system, safety training, incident monitoring and preventive measures
Equal opportu-nities	Risk of discrimination or inequality in the workplace	Equality and non-discrimination policies; recruitment processes based on objective criteria
Talent development	Risk of talent loss or insufficient professional development	Training programmes, professional development and performance assessment
Data protection	Risks related to the processing of personal data	Data-protection policies, information access controls and privacy training
Cybersecurity	Risks of unauthorised access or loss of information	IT security systems, access controls and system-protection measures
Working conditions in the value chain	Risks associated with suppliers' labour practices	Supplier assessment and monitoring; inclusion of ESG criteria in procurement processes
Business ethics and corruption prevention	Risk of practices contrary to business ethics	Code of Conduct, anti-corruption policies and whistleblowing channel

SUSTAINABILITY RISK MANAGEMENT

ESRS 2 GOV-5

RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

TWG has a sustainability risk management system integrated into its overall risk management framework. This system enables the Group to identify, assess and prioritise the main ESG risks associated with its activities, using the material topics identified through the double materiality assessment as a reference.

To ensure the reliability, consistency and quality of the information reported, the Group has established internal controls over the collection, validation and consolidation of sustainability data.

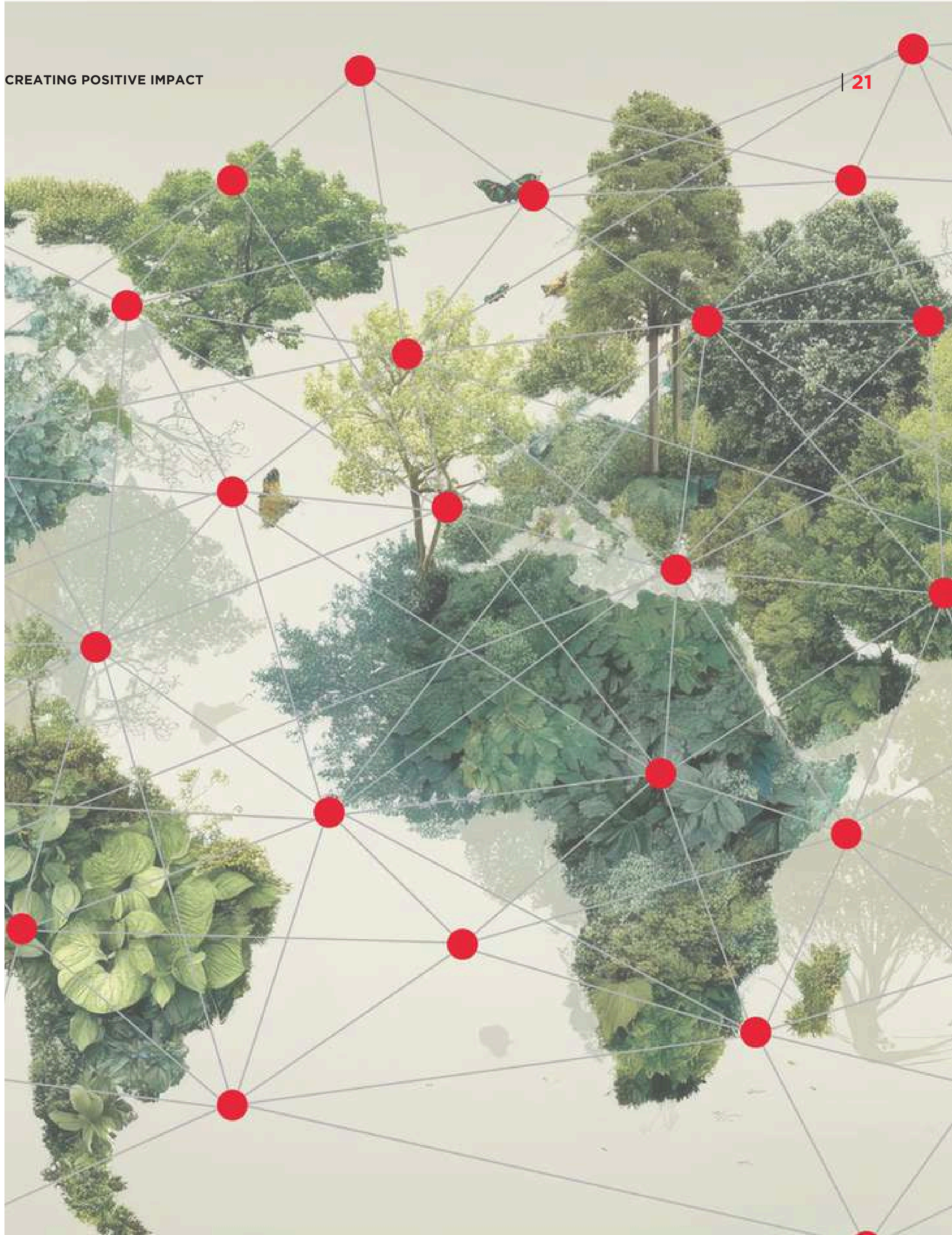
Sustainability information is managed through a Power BI-based reporting platform, which centralises indicators and enables structured periodic monitoring.

Members of the Sustainability Committee (CSOS) review the information relating to their respective areas of responsibility, verify supporting evidence and validate data before consolidation, thereby reinforcing the consistency and reliability of the information reported.

In addition, **quantitative data from corporate systems (SAP and SAGE)** are reviewed by the Administration and Finance area through the controllers of the Group's main companies, in order to ensure consistency with financial and operational information.

Likewise, **the infrastructure area and the CIOs of each business unit establish controls relating to information systems and technology risks associated with sustainability reporting.** establecen los controles relacionados con los sistemas de información y los riesgos tecnológicos asociados al reporting de sostenibilidad.

This set of controls helps ensure the integrity, traceability and quality of the information included in this Sustainability Report.



Our Strategy and Business Model

06

Group

6. Our Strategy and Business Model.

General information / ESRS 2 General Disclosures

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

SBM-1

STRATEGY, BUSINESS MODEL AND VALUE CHAINEGIA, MODELO DE NEGOCIO Y CADENA DE VALOR

TWG bases its strategy on **operational strength, reliability and flexibility** positioning itself as a strategic partner for major companies operating to high standards of quality and performance. Our **value proposition is based on our ability to adapt to each client's specific needs**, integrating into their operations and directly contributing to their efficiency and competitiveness.

The Group operates in key markets defined both by its own strategy and by that of its clients, whom it supports in their growth and international expansion. This approach strengthens our role as a leading industrial and logistics partner, bringing sector expertise, technological innovation and operational capability to design high-value solutions in mobility, production and the supply chain.

With more than 25 years of experience, TWG has become an international business group structured into two complementary divisions:

- **TWLogistics (TWL),** specialising in advanced logistics and end-to-end transport management.
- **TW Automotive (TWA),** a Tier 1 supplier specialising in component sequencing for the automotive sector.

Both divisions share a common objective: **to provide integrated solutions that optimise our clients' operations and contribute to their long-term competitiveness.**

TWG's business model is based on a **flexible, scalable and client-oriented structure,** combining technical, operational and technological capabilities.

At TWL, we develop **tailored logistics solutions** that integrate proprietary technology, automation and end-to-end traceability. Transport activities are carried out by specialised third parties that own the assets used, enabling the Group to maintain an asset-light, flexible and resource-efficient model. Our multisector experience — automotive, retail, food, mass distribution and chemicals, among others — facilitates the adaptation of solutions to different operational and strategic contexts.

At TWA, we play a key role in the automotive value chain **as a Tier 1 supplier to leading global manufacturers**. Our plants operate in direct sequence with vehicle manufacturing plants (JIT/JIS), providing integrated logistics, assembly, quality and management services. We apply **advanced technologies** to ensure robust and efficient processes aligned with sector requirements for safety, quality and emissions reduction.

TWG'svalue chain is characterised by a model that is highly integrated into our clients' operations:

- **Upstream (suppliers):** collaboration with transport, technology and equipment service providers, prioritising long-term relationships and efficiency and quality criteria.
- **Own operations:** design, management and optimisation of logistics, industrial and production processes, incorporating automation, digitalisation and continuous improvement. ño, gestión y optimización de procesos logísticos, industriales y productivos, incorporando automatización, digitalización y mejora continua.
- **Downstream (clients):** direct integration into the supply chains of global clients, contributing to operational efficiency, cost reduction and improved end-service quality.

This positioning enables TWG to act as a key facilitator in the transition towards more efficient, resilient and sustainable supply chains.

Since its beginnings, **TWG** has pursued an **activegrowthandinternationalisation**

strategy, aimed at consolidating its presence in relevant markets and industries. This growth is based on a diversified model combining industrial vision, technical capability and commitment to sustainability.

In 2025, the Group began operations in Australia, opening two operating centres in Sydney and Melbourne and strengthening its global presence and ability to support clients in new markets.

TWG holds leading positions in several key sectors:

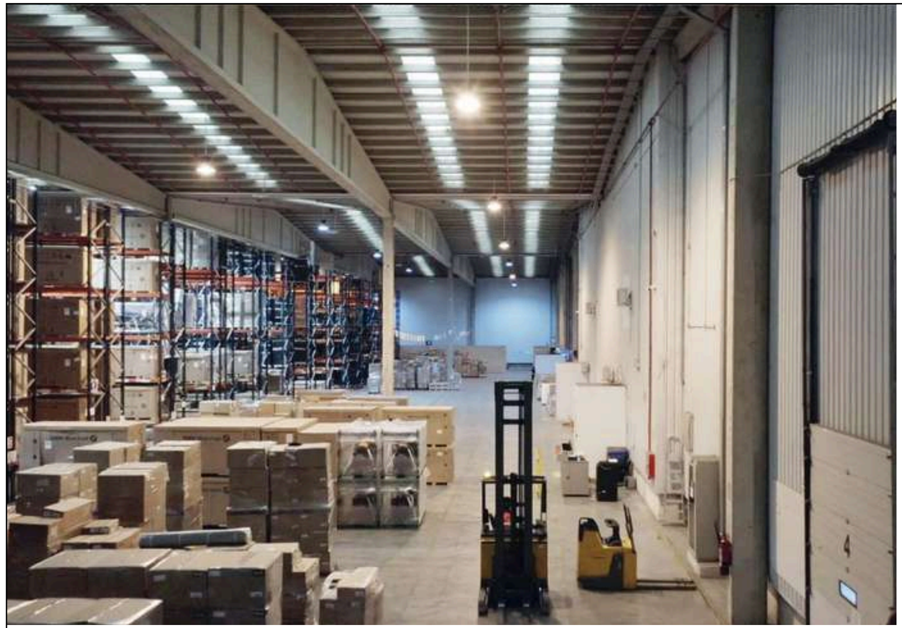
- **Automotive:** leadership in night distribution and JIT/JIS operations.
- **Retail** and fashion: unattended-delivery solutions and high operational flexibility. **Food** and beverages: storage and handling adapted to product characteristics.
- **Hydrocarbons** and chemicals: highly specialised and tailored operations.
- **Industry:** ability to adapt infrastructure and provide bespoke services, including production support.
- **Sustainability is a cross-cutting pillar of TWG's strategy and** is progressively integrated into decision-making and operations management, with particular focus on:
  - **Operational** and energy efficiency
  - **Reducing** emissions across the supply chain
  - **Collaboration** with suppliers and clients on responsible practices

During the year, **the Group began its EcoVadis assessment**, in line with its **commitment to transparency and continuous improvement.** The process responds both to increasing requirements from international clients and to the Group's intention to benchmark its
ESG performance against globally recognised standards.

The results have identified areas for improvement that will be incorporated into sustainability action plans for the coming years.

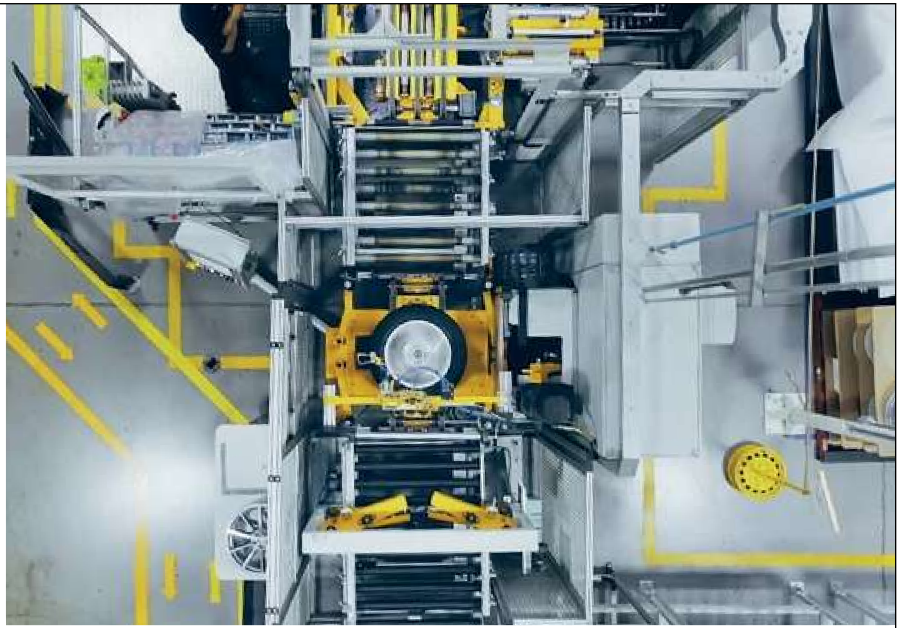
SBM-1 M-1

STRATEGY, BUSINESS MODEL AND VALUE CHAIN. OUR BUSINESS MODEL



TW Logistics

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



TW automotive

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


USA
Logistics Centers
Alabama
California
Houston
South Carolina*
USA
Plant
Alabama
TW automotive
UK
Logistics Center
Glasgow
Manchester
Leeds
Northampton
Bristol
Milton Keynes
SWEDEN
Logistics Center
Malmö
FRANCE
Logistics Centers
Annecy
Arras
Avignon
Bordeaux
Dijon
Limoges
Lyon
Metz
Montauban
Niort
Rennes
Rouen
Strasbourg
Survilliers
Tigery
Tours
GERMANY
Plant
Bavaria
TW automotive
PORTUGAL
Logistics Centers
Guarda
Lisbon
Porto
SPAIN
Logistics Centers
Alicante
Asturias
Barcelona
Cabanillas del Campo
Coruña
Jaén-Guarromán
Larrabetzu
Málaga
Pamplona
Sevilla
Tenerife
Toledo
Valencia
Vigo
Vitoria
Zamora
Zaragoza
MEXICO
Plants
Puebla
San José de Chiapas
San Luis de Potosí
TW automotive
AUSTRALIA
Logistics Centers
Sydney
Melbourne
*Coming soon

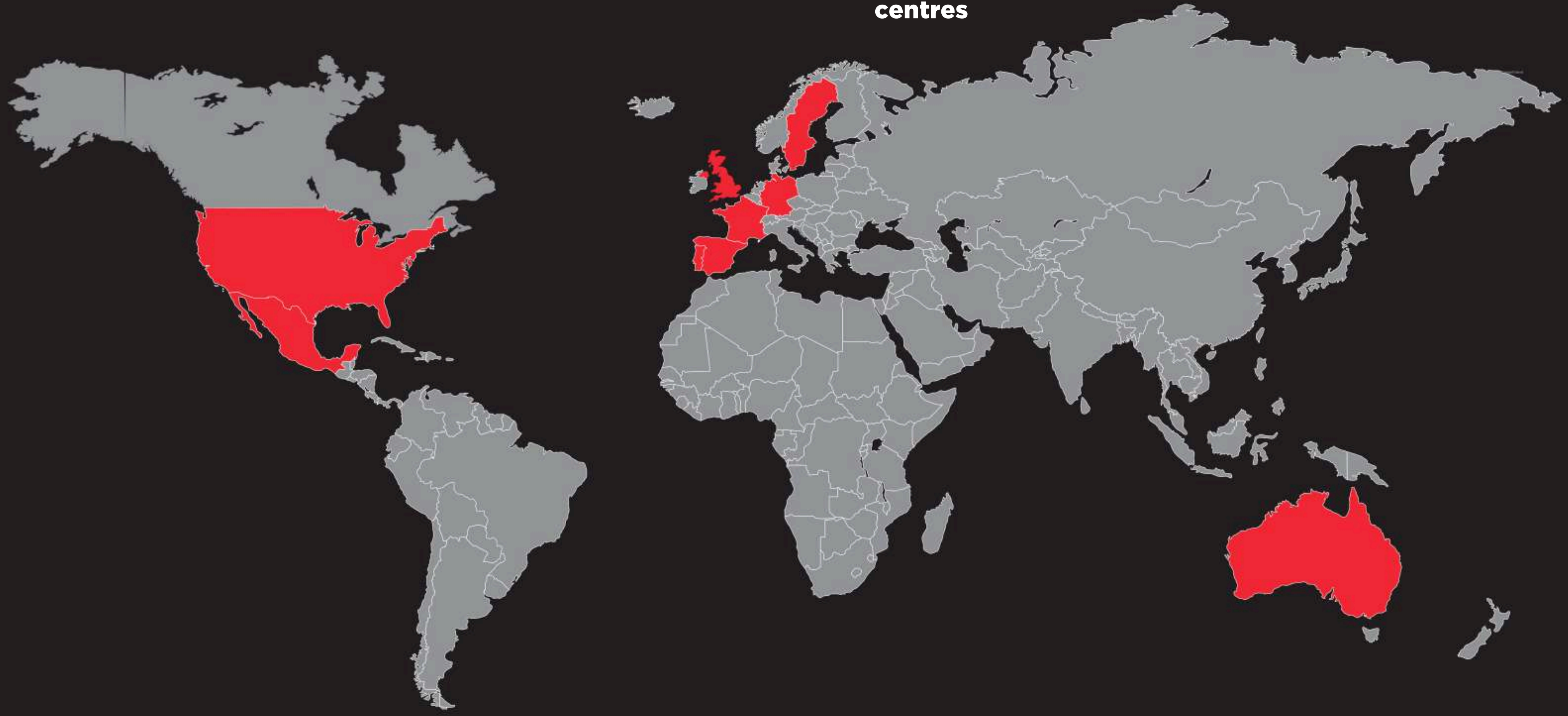
Group

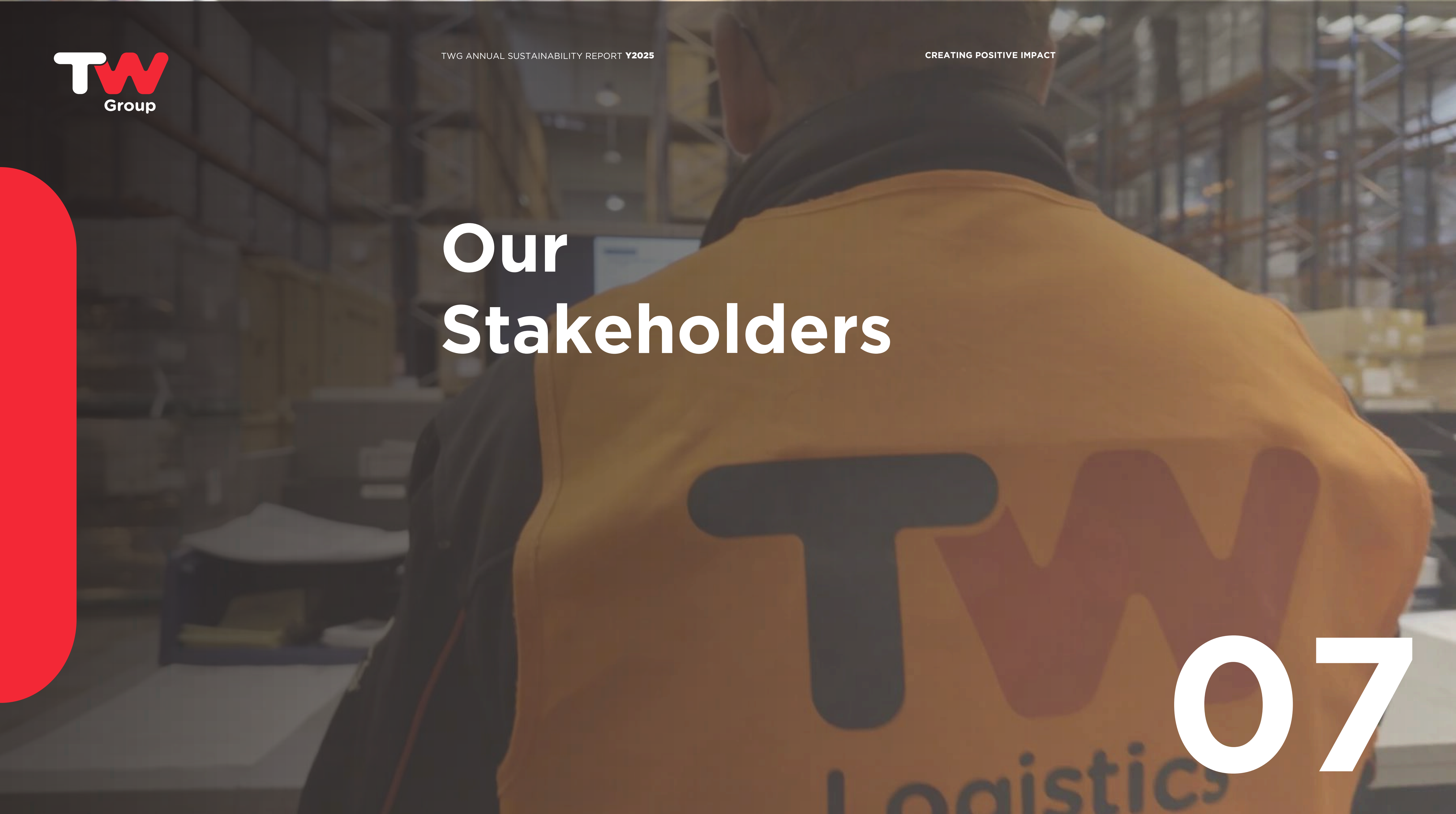
9
Countries

5
TWA Plants

32
TWL logistics hubs and distribution centres

+500.000
m2





Our Stakeholders

07

7. Our Stakeholders

SBM-2

Stakeholder interests and views

Stakeholder engagement is a key element of **TWG's** ability to create sustainable value and ensure long-term success. Understanding stakeholder expectations, needs and perspectives is an integral part of our strategy and business model. This approach takes shape in multiple areas: from developing low-carbon logistics solutions that help reduce emissions in our clients' supply chains, to creating a meaningful working environment that supports our growth strategy, as well as promoting integrity-based business practices in all the markets in which we operate.

Engagement with stakeholders on material sustainability matters involves the coordinated participationofseveral keyactors within the organisation.The **Vice President is responsible for communicating and aligning the strategy defined by the Board of Directors, while CSOS members oversee its effective implementation and compliance.**

TheSustainability Committee (CSOS) also contributes specialist expertise from its different areas: Environment, Occupational Health and Safety, Human Resources, Quality and Purchasing, as required.

The following table describes how we engage with our main stakeholders, the purpose of these engagements and the outcomes achieved. Stakeholder input is a fundamental element of our due diligence process and materiality assessment, which is described in greater detail in **section IRO-1.**

Stakeholders *	Dialogue channel	Frequency	Relevant topics	Communication strategy - Expectations	Compliance and associated procedures
SHAREHOLDERS	Board of Directors meetings	Monthly	Identification and management of risks and opportunities	Strategic Plan monitoring	Corporate risk matrix (criminal and operational)
	Shareholders' Meeting	Annual	In-person meetings to monitor management and budgetary control, appoint or ratify Directors and adopt measures to pursue the corporate purpose.	Review of economic and financial performance and progress against objectives	Financial statements and sustainability information. Transfer Pricing Policy - Conflict of Interest Policy
	Executive Committee meetings	Monthly	Operational performance	Results monitoring	Executive Committee reports
	Ethics communication channel	Periodic	Regulatory compliance	Regulatory compliance	Code of Ethics - Anti-Corruption Policy - Ethics communication channel procedure - 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
CLIENTS	Commercial visits	Periodic	Service quality, corporate sustainability	Compliance with agreed quality and sustainable management requirements	Integrated Quality, Environment and Occupational Health & Safety Policy
	Client audits	Periodic			ISO 9001 - ISO 14001 - ISO 45001 - TAPA FSR - IATF 16949 - TISAX - VDA certification
	SAQ, RBA assessments	Annual	Sustainability performance	Sustainable management compliance through certifications	
	Participation in clusters and associations	Periodic	Activity opportunities and risks	Monitoring innovation, activity risks, shared expectations and objectives	Monitoring innovation, activity risks, shared expectations and objectives
	Corporate website	Annual	Sustainability performance - objectives, purpose, mission, management	Transparency	Content updates - Sustainability Report
	Ethics communication channel	Periodic	Ethics, transparency, current policies	Transparency - regulatory compliance	TWG Code of Ethics - TWG Anti-Corruption Policy - Ethics channel operating procedure
	Digital channels and telephone	Ongoing	Management of complaints and concerns	Improved client satisfaction - Data protection - Cybersecurity	ISO 9001, ISO 14001 and ISO 45001 / Data Protection Policy / Cybersecurity Policy
	Sustainability email: sustainability@tw-group.com	Periodic	Sustainability performance - objectives, purpose, mission, management	Transparency	Content updates - Sustainability Report
	Satisfaction surveys	Periodic	Service quality, corporate sustainability	Complaint management and service quality	ISO 9001, ISO 14001 and ISO 45001

Stakeholders *	Dialogue channel	Frequency	Relevant topics	Communication strategy - Expectations	Compliance and associated procedures
EMPLOYEES	DirectcontactwithHR Management Works Councils Internal email Communication boards	Periodic	Work-life balance, talent attraction and retention, data protection, talent development, remuneration	Management and improvement of working conditions	Code of Ethics, Anti-Corruption Policy, Human Rights Policy, Inclusion, Diversity and Equal Opportunities Policy, Data Protection Policy, Information Security Policy, Onboarding Plan, Equality Plan
	Equality Committees		Diversity, Equality and Inclusion		
	Ethics communication channel cce@tw-group.com	Ongoing	Compliance with the Code of Ethics		Ethics communication channel operating procedure and CCN Committee Operating Policy
	Occupational Health and Safety Committees	Periodic	Occupational health and safety		Integrated Environment, Quality and Occupational Health & Safety Policy
SUPPLIERS AND SUBCONTRACTORS	Email, trade fairs, commercial visits, meetings, assessments, ethics communication channel cce@tw-group.com, corporate website	Periodic Periodic Annual Occasional	Quality, environmental sustainability (emissions reduction and circular economy) and social sustainability (respect for human rights)	Ensure supply and automate payments under fair conditions and in compliance with agreements - environmental and social sustainability in the supply chain	Supplier Code of Ethics (SCE), Data Protection Policy, Integrated Management System Policy, Sustainable Purchasing Policy.
		Occasional Occasional Periodic Periodic Occasional	Cybersecurity, Data Protection, Quality and environmental sustainability (emissions reduction) and social sustainability (respect for human rights)		
		Occasional	Data Protection, Quality and environmental sustainability		

Stakeholders *	Dialogue channel	Frequency	Relevant topics	Communication strategy - Expectations	Compliance and associated procedures
COMMUNITY	Forums, conferences, presentations, meetings	Periodic	Social sustainability (human rights) and environmental sustainability (emissions reduction)	Promote a responsible brand image, growth through job creation, talent attraction, innovation and knowledge, and training.	Code of Ethics, Anti-Corruption Policy, Human Rights Policy, Data Protection Policy, Information Security Policy, Onboarding Plan, Equality Plan
	LinkedIn	Occasional	Transparency	Promote the responsible brand image and improvement actions and initiatives	Code of Ethics
	Ethics communication channel: cce@tw-group.com / Website / LinkedIn	Ongoing	Social sustainability (human rights) and environmental sustainability (emissions reduction)		Code of Ethics, Anti-Corruption Policy, Human Rights Policy, Data Protection Policy, Information Security Policy, Sustainable Purchasing Policy
	Forums, conferences, presentations, meetings	Occasional Occasional	Innovation and Sustainability	Promote exchange of knowledge and regulatory developments	Code of Ethics
PUBLIC AUTHORITIES	Email: Sustainability@tw-group.com	Occasional	Environmental sustainability (emissions measurement)	Compliance with commitments and regulatory frameworks	Carbon footprint measurement
	Digital certifications, corresponding websites, ethics communication channel: cce@tw-group.com		Economic and financial sustainability		Financial Statements and EINF - Sustainability Report
			Data protection		
			Economic, financial, environmental and social sustainability (respect for human rights, creation of quality employment)		
FINANCIAL INSTITUTIONS	Email, telephone, meetings	Occasional	Economic, financial, environmental and social sustainability	Compliance with commitments and regulatory frameworks	EINF - Sustainability Report, Financial Statements, Code of Ethics, SCE, Anti-Corruption Policy, Carbon Footprint Measurement

Materiality: Assessment Process

08

8. Materiality: Assessment Process

Materiality assessment

ESRS 2 IRO-1

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

In 2023, we carried out our first **Double MaterialityAssessment**

The assessment approach and criteria were established in strict accordance with the requirements of **ESRS 1**, focusing on:

- **Impact materiality:** Considering the scale, scope, irremediability and likelihood of impacts, whether positive/negative and actual/potential.

Severity takes precedence over likelihood for human-rights-related impacts under **ESRS 1**.

- **Financial materiality:** Assessment of the financial significance of risks/opportunities, their likelihood and the nature of the financial effects.

Identification of sustainability matters

The first step in identifying material matters was to assess the context of **TWG's** activities, taking into account our activities and business relationships, the value chain and affected stakeholders. This analysis included sustainability topics and subtopics that were not relevant to our business model, which were excluded from the review.

Stakeholder engagement

As a key exercise prior to identifying materiality, the Sustainability area mapped all TWG stakeholder groups and subgroups (see **SBM-2**) and then prioritised them as follows:

1. Level of impact on TWG's Sustainability Strategic Plan**TWG** (High/Medium/Low) based on their contribution to achieving the objectives of this Plan.
2. Level of relationship with those stakeholders[2] (Continuous/Occasional)
3. Prioritisation – taking the dialogue channel into account

Materiality scoring approach

The materiality assessment score was developed using the methodology and criteria required by ESRS 1. All IROs were assessed and scored on a gross basis. A sustainability matter was considered material if at least one IRO exceeded the threshold, indicating impact materiality, financial materiality, or both. Sustainability matters considered non-material were those for which no IROs had been identified and/or all IROs[3] were below these thresholds. Identifying IROs relating to business conduct matters involved mapping geographical areas with elevated potential impacts or risks arising from corruption and bribery (Administration and Finance, Legal and Purchasing) using the "Corruption Perceptions Index"[4], and human rights violations (Human Resources), for which the "Living Wage Analysis"[5] and the "Human Rights World Report"[6]. The climate scenarios used are compatible with the critical climate-related assumptions for the locations where we operate, based on "The Climate Risks in the Transportation Sector"[7]. The time horizons and quantitative and qualitative thresholds applied to IRO scoring were: short term: less than 1 year; medium term: 1 to 3 years; long term: more than 3 years. This exercise was approved by the Board of Directors and stakeholder surveys were not conducted on this occasion, as those from the previous period were taken into account.

Internal policies and procedures, the criminal-risk matrix under development, insurance policies and existing contingency plans were also reviewed to minimise the risks affecting TWG..

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2 Stakeholders = Stakeholder Groups
3 IROs = Impacts, Risks and Opportunities
4 https://www.transparency.org/en/cpi/2024
5 https://livingwagetool.unglobalcompact.org/
6 https://www.hrw.org/es/world-report/2024 UN
7 Environment Sector, May 2024

Internal policies and procedures, including those already systematised and those not yet systematised (which increases their risk level), the criminal risk matrix currently being developed, insurance policies and existing contingency plans were also reviewed in order to minimise the risks affecting **TWG.**

Environmental

E1 Climate

- 1 Climate change adaptation (CCA)
- 2 Climate change mitigation (CCM)
- 3 Energy

E2 Pollution

- 4 Air
- 0 Water
- 0 Soil
- 0 Living organisms
- 0 Substances

E3 Water and marine resources

- 0 Water withdrawals
- 0 Marine resources
- 0 Degradation of aquatic habitats

E4 Biodiversity and ecosystems

- 0 Direct drivers of biodiversity loss
- 0 Impacts on the state of species
- 0 Ecosystem extent and condition
- 0 Ecosystem impacts and dependencies

E5 Resource use and circular economy

- 0 Resource inflows and use
- 0 Resource outflows from products/services
- 7 Waste

Social

S1 Own workforce

- 9 Health and Safety
- 10 Equal treatment/opportunities: diversity, disability inclusion, gender equality
- 11 Talent development: Training
- 12 Other work-related rights: Data protection

S2 Workers in the value chain

- 13 Working conditions: health & safety, workimg time
- 0 Equal treatment and opportunities
- 14 Other labour rights: Privacy

S3 Affected communities

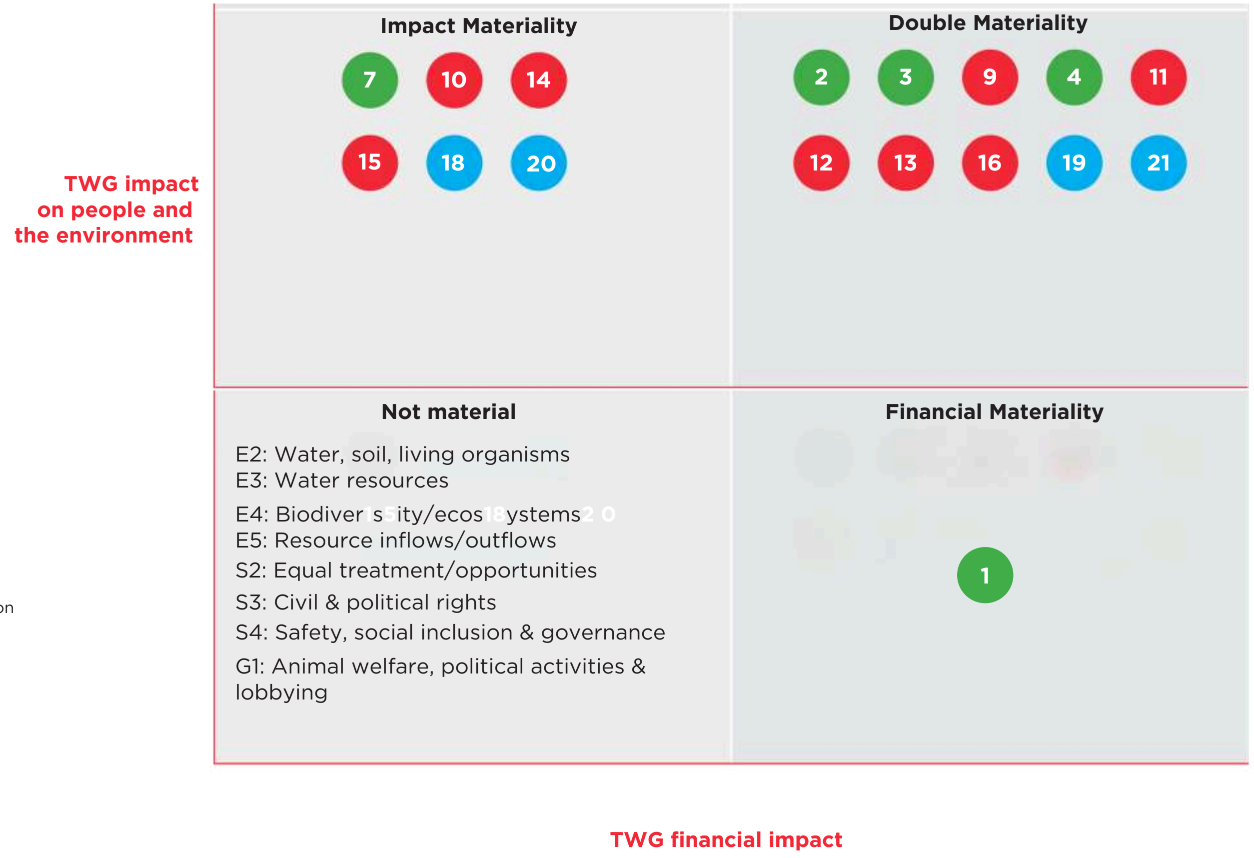
- 15 Economic, social & cultural rights: culture promotion
- 0 Civil and political rights
- 0 Specific rights of Indigenous peoples

S4 Consumers and end-users

- 16 Client satisfaction/quality: access to quality information
- 0 Personal safety of consumers
- 0 Social inclusion of consumers
- 0 Governance

G1 Business conduct

- 18 Corporate culture
- 19 Cybersecurity, whistleblower & data protection
- 0 Animal welfare
- 0 Political activities and lobbying
- 20 Payment practices with suppliers
- 21 Corruption and bribery



Reporting topics included within scope

Topics marked “0” in the list on the right were considered irrelevant from the outset and were therefore not included in the engagement process.

The results of the double materiality assessment are progressively integrated into the Group's risk-management, strategic-planning and indicator-definition processes. **TWG** is committed to periodically updating its DMA and considering evolving trends, contextual assumptions and regulatory changes following the appointment of the Legal Director, through the work of the Regulatory Compliance Committee (CCN) and its monitoring and approval by the Board of Directors. The Sustainability area will also periodically conduct an in-depth review of the DMA to ensure its effectiveness and relevance.

Results of the materiality assessment (see below)

A total of 175 IROs were identified and assessed during the DMA, resulting in 10 material topics as shown in the following table. The environmental area identified 3 negative impacts and 5 risks; the social area identified 1 negative impact, 6 risks and 2 opportunities; and governance identified 2 risks and 1 opportunity.

ESRS 2 SBM-3

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND THE BUSINESS MODEL

E1 - E5

MATERIAL RISKS, IMPACTS AND OPPORTUNITIES		**Location in the value chain**			**Time horizon**		
CLIMATE CHANGE		Upstream	Own operations	Downstream	Short term	Medium term	Long term
Mitigation - Value chain GHG emissions GHG emissions from TWG-contracted carriers contribute to climate change.	Actual negative impact			●	●	●	●
Mitigation - Value chain GHG emissions If carriers cannot reduce emissions, Scope 3 emissions and potential emissions-related costs may rise.	Risk			●		●	●
Mitigation - GHG emissions from own operations TWG-owned vehicles and electricity used in offices and warehouses generate emissions from fossil fuels.	Actual negative impact		●		●	●	●
Mitigation - GHG emissions from own operations Slow low-carbon transition may prevent Scope 1 target achievement and reduce market share if client demand is not met.	Risk		●		●	●	●
Air pollution Contracted road carriers use fossil fuels, generating GHGs, NOx, SOx and particulate matter; higher activity increases air pollution.	Actual negative impact and Risk	●	●	●	●	●	●
Circular economy - Waste Client-specified non-recyclable materials create impacts from non-renewable resource use and may also entail financial penalties.	Actual negative impact and Risk			●	●	●	●

E1 - E5

MATERIAL RISKS, IMPACTS AND OPPORTUNITIES		Location in the value chain			Time horizon		
CLIMATE CHANGE		Upstream	Own operations	Downstream	Short term	Medium term	Long term
Mitigation - GHG emissions Failure to reduce emissions or adopt a decarbonisation plan may threaten strategic-client retention, business continuity and financial performance.	Risk	●	●	●		●	●
Mitigation - GHG emissions Regulatory pressure may restrict access to certain sites and affect operations.	Risk		●			●	●
Mitigation - GHG emissions Slow adoption of low-carbon logistics may prevent achievement of published Scope 3 targets and affect the business.	Risk		●			●	●
Mitigation - GHG emissions Using AI to optimise logistics and reduce emissions could improve environmental performance and lower costs.	Opportunity		●		●	●	●
Mitigation - GHG emissions and air pollution Partnerships with transport contractors to use biofuels can reduce emissions and air pollution.	Opportunity			●	●	●	●
Energy - Energy consumption Purchasing more renewable energy can reduce emissions and strengthen competitiveness in response to client expectations.	Opportunity		●		●	●	●
Mitigation - GHG emissions A Decarbonisation Plan can reduce emissions and environmental impact while improving competitiveness.	Opportunity		●		●	●	

S1

MATERIAL RISKS, IMPACTS AND OPPORTUNITIES		Location in the value chain			Time horizon		
OWN WORKFORCE		Upstream	Own operations	Downstream	Short term	Medium term	Long term
Working conditions - Occupational health and safety Warehouse and assembly employees face higher physical-injury risks, including risks from chemicals, leaks, explosions and complex machinery.	Risk		●		●	●	●
Working conditions - Occupational health and safety A pandemic or serious health crisis could disrupt business productivity.	Risk	●	●	●		●	●
Equal treatment - Training and development opportunities High turnover reflects logistics seasonality; talent-retention initiatives could reduce it.	Actual negative impact and Opportunity		●		●	●	●
Other labour rights - Privacy Digital data may be vulnerable to cyberattacks, putting employee privacy and company information security at risk.	Risk		●		●	●	●

S3

MATERIAL RISKS, IMPACTS & OPPORTUNITIES		Value-chain location			Time horizon		
		Upstream	Own operations	Downstream	Short term	Medium term	Long term
CONSUMERS & END-USERS							
Information-related matters – Access to information (quality), data protection & cybersecurity							
Service quality is critical. All warehouses and plants are ISO 9001 certified. At TWL, 20% of customers complete satisfaction assessments; at TWA, customers set and monitor quality requirements directly. The volume of customer data creates a potential security-breach risk.	Positive impact, opportunity & risk		●			●	●

G1

MATERIAL RISKS, IMPACTS & OPPORTUNITIES		Value-chain location			Time horizon		
		Upstream	Own operations	Downstream	Short term	Medium term	Long term
BUSINESS CONDUCT							
Corporate culture – Cybersecurity							
Unauthorised access to confidential data or facilities; theft of data/equipment; business interruption and financial loss; compensation for harm to users; reputational damage; and legal consequences for information-security failures.	Risk		●		●	●	●
Corruption, bribery & money laundering							
Money-laundering and supply-chain fraud may lead to litigation. Training, a strong corporate culture and risk-based audits by Procurement and Legal provide an opportunity for improvement.	Risk & opportunity	●	●			●	●

Environmental information ESRS E1&E2

09

9. Información ambiental ESRS E1&E2

212.163,94 t

CO_2-eq emissions Scopes 1,2and3

+137%*

in renewable energy consumption

+18,44%*

ofrecycled rawmaterialin total supplied

+4,9%*

in environmental training hours

* Y2025 vs Y2024

CLIMATE CHANGE AND CARBON FOOTPRINT

E1-1

Strategy and Approach

In 2025, 99.6% of the Group's total GHG emissions fall under Scope 3, while Scope 2 accounts for 0.3% and Scope 1 for 0.1%. This breakdown reflects that the main focus of action for reducing emissions lies in the value chain, without prejudice to energy efficiency measures and the transition to renewable energy in our own operations.

TWG has quantified the corresponding greenhouse gas emissions since 2022, covering Scopes 1 and 2, in accordance with the GHG Protocol standard. This benchmark standard has been applied using the operational control approach. In addition, we have reported these emissions to the Carbon Footprint Registry of the Ministry for Ecological Transition and the Demographic Challenge (MITERD) for Spain during the periods mentioned. The year 2024 was the first year of measurement for Scope III.

As a result of strengthening our processes for measuring and consolidating emissions data carried out in 2024—including the expansion to the value chain and the centralization of information and evidence—in 2025 we were able to develop and **implement our Decarbonization Plan**. This Plan is structured around our participation in the **Lean & Green** initiative (coordinated in Spain by AECOC), which promotes the reduction of emissions associated with logistics activities through an action plan, a monitoring system, and external verification of progress. As part of this initiative, TWG is committed to reducing logistics-related GHG emissions by at least **20%** within a maximum of **5** years, thereby strengthening our decarbonization roadmap and collaboration with the value chain.

TWG CLIMATE TRANSITION PLAN

E1-1

Transition plan for climate change mitigation

Decarbonisation levers

TWG's transition plan will focus during 2026 on decarbonising transport emissions and the energy consumption of our assembly plants. This will be achieved through the following levers:

- **Provide** low-carbon logistics solutions, using our flexibility to select carriers that are decarbonising their assets.
- **Partner** with other actors in the value chain, such as biofuel suppliers.
- **Set** short- and long-term science-based targets for Scopes 1, 2 and 3 (SBTi initiative).
- **Reduce** emissions from our own operations by purchasing green energy for warehouses and plants and using biofuels in our own vehicles.

Integration into TWG's strategy

The Transition Plan is integrated into TWG's strategy and will be financed through our annual financial planning process, approved by the Board of Directors. Within this framework, TWG has developed and launched its Decarbonisation Plan in collaboration with the Lean & Green initiative (coordinated in Spain by AECOC), based on an action plan with progress monitoring and verification to reduce emissions associated with logistics activity. As a milestone in this progress, in November 2025 TWG received the Lean & Green Award, recognising the Group's commitment to sustainable and efficient logistics. TWG's Vice-Chair, as a member of the Board, is responsible for ensuring implementation and financing of the strategy and coordinating its deployment across the areas involved. Progress is reviewed periodically: each area collects the data, the Environment team validates it and the Sustainability Committee (CSOS) supervises progress every six months, including status, possible deviations and corrective measures where necessary. TWG is not excluded from Paris-aligned benchmarks.

ESRS 2 SBM-3

Climate change impacts

The materiality assessment described under 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 activities. This actual negative impact occurs downstream in our value chain, is systemic to the transport sector and has short-, medium- and long-term environmental effects.

Mitigation – GHG emissions from our own operations

TWG operates a small fleet of company vehicles and uses electricity to heat and light its offices and warehouses. These sources generate emissions from the combustion of fossil fuels and contribute to climate change. This negative impact occurs in **TWG**'s own operations in the short and medium term. During the reporting year, there were no environmental emergencies and no environmental complaints, sanctions or claims were received.

ESRS 2 SBM-3

Climate change risks and opportunities

In 2025, **TWG**'s environmental managers carried out a climate-scenario analysis with the insurance company and reviewed the contingency plans for each warehouse and plant. The assessment concluded that, given our business model, we do not face significant technology or investment costs or risks. Physical risks are also covered and appropriately mitigated by the relevant insurance policies, which are aligned with the contingency plans described above.

		CLIMATE-RELATED OPPORTUNITIES	HOW TWG'S BUSINESS MODEL AND/OR STRATEGY CAPTURES THE OPPORTUNITY
Medium term	Technology	Transition to low-emission technology AI will support route optimisation and real-time monitoring.	Offer low-carbon logistics services These solutions will expand our existing offer for current and new customers, extend low-carbon logistics to more customers and provide detailed analysis and forecasts to improve planning and resource management.
	Partnerships	Transition to biofuel Partnerships with major biofuel suppliers are an opportunity to offer carriers competitive prices while contributing to transport decarbonisation.	Reducing dependence on conventional fossil fuels can mitigate oil-price volatility risks, improve energy security and support compliance with environmental regulation and emissions-reduction targets.

		CLIMATE TRANSITION AND RISKS – Value-chain GHG emissions	HOW TWG'S BUSINESS MODEL AND/OR STRATEGY MITIGATES THE RISK
Medium term	Technology and physical risk	Transition to low-emission technology Carriers both upstream and downstream will need to decarbonise their assets to comply with EU emissions requirements and equivalent requirements in other countries.	TWG asset-light business model **TWG** The business model avoids direct asset-decarbonisation risk, while TWG will promote biofuels across the supply chain through training, commitments and future supplier assessments.
Short term	Market	Risk of missing targets Slower adoption of low-carbon logistics may put TWG at risk of missing its published Scope 1 and 2 emissions-reduction targets.	Our decarbonisation strategy Replace fossil fuels with cleaner alternatives, including natural gas and biofuels in our own fleet, and ensure any new vehicle purchase complies with the Sustainable Procurement Policy.
		Failure to meet customer demand may result in loss of market share.	Reduce fugitive emissions by identifying and repairing leaks in equipment and systems handling gases and fuels, such as pipes and storage tanks.
Medium term	Reputation and technology	Risk of slow response	Our communication strategy Maintain open and transparent communication on decarbonisation efforts and progress, with regular detailed reporting on emissions and reduction actions.

Management of impacts, risks and opportunities

E1-2

Policies related to climate change mitigation and adaptation

TWG has an Environment, Quality and Occupational Health & Safety Policy, reviewed in 2023 by the Sustainability Director in line with the Board of Directors' strategy. It defines and communicates how we manage environmental performance and sustainability. The policy is binding on all **TWG** employees. Environmental managers communicate it to all TWA plant directors and TWL hub managers and coordinate content and training so that all employees are familiar with it. They also share the impacts of related procedures and training with the Sustainability Committee (CSOS). Training is recorded locally and reported on the sustainability platform. We also have a Sustainable Procurement Policy, prepared by the Sustainability Director and **approved by the Compliance Committee and the Board of Directors.This policy asks suppliers to: Environment, Quality and Occupational Health&Safety Policy** was reviewed in 2023 by the Sustainability Director, aligned with the Board of Directors' strategy, and defines how we manage environmental performance and sustainability. The policy is binding on all **TWG** employees. Environmental managers communicate it to TWA plant directors and TWL hub managers, coordinate content and plan training so all employees understand the policy.They also report to the Sustainability Committee (CSOS) on related procedures and training. Training is recorded locally and reported through the sustainability platform.

We also have a **Sustainable Procurement Policy**, prepared by the Sustainability Director and approved by the Compliance Committee (CCN) and Board of Directors (BoD). It requires suppliers to:

- **Reduce** greenhouse gas emissions and adapt to climate change.
- **Improve** energy efficiency through renewable energy and efficient material use.
- **Optimise** waste management, prioritising recycling and circularity.
- **Develop** technologies that support these improvements.

Legal verifies that supplier contracts include clauses aligned with the Sustainable Procurement Policy; Procurement informs Sustainability of supplier type so compliance can be assessed.

We also have a **Sustainable Travel Policy** approved by the Board of Directors in 2025.It sets common criteria to minimise the environmental impact of business travel while supporting operational efficiency, safety and responsible resource use.The Group prioritises more sustainable transport, rational travel and digital alternatives where possible, helping reduce emissions, meet ESG commitments and foster a corporate culture aligned with sustainable development.

E1-3

Actions and resources related to climate-change policies

All **TWG** sites are **ISO 14001** certified, except the Australian sites, which are due for certification in 2026. Emission reductions are being addressed through the following levers and actions, aligned with the **Lean & Green** Decarbonisation Plan:

1. Providing low-carbon logistics solutions

Because most **TWL** emissions are Scope 3, our decarbonisation strategy helps customers move to our portfolio of low-carbon logistics solutions through **innovation**. This includes progressively selecting carriers that are decarbonising their assets.

TWG considers process efficiency and optimisation essential. In 2026 we will:

- **Implement on line** inventory-tracking applications to maintain efficient workflows.
- **Implementwarehouse-operation** tracking systems to optimise product management from receipt to dispatch and streamline picking.
- **Optimise routes** using advanced algorithms and real-time data to reduce travel time and fuel consumption.

2. Partnering with others in the supply chain

Supply-chain decarbonisation is a joint effort. In 2025,**TWG** measured Scope 3 emissions and began supplier assessments, which will intensify in 2026. Procurement assesses risk by supplier type (10 categories), while Sustainability sets objectives communicated to Legal forinclusion in contracts and continues assessing compliance in 2026.

Given the complexity of decarbonisation, collaboration with customers and suppliers is essential. We therefore met fuel suppliers to seek competitive biofuel prices for our carriers.

A key example is the agreement with Ford: since mid-2025, HVO biofuel has been used on Valencia logistics routes. These routes increased to 18 of 25, cutting associated emissions by up to 90%.

This approach extends across our logistics services through specific plans to reduce electricity use, waste and emissions and increase packaging reuse.

3. Reducing emissions from our own operations

In 2025, four warehouses in Spain, one in Sweden and one in Germany moved to green electricity, joining the 11 reported in 2024. Other measures include sensors and automatic lighting shut-off at two plants, climate-control automation in Germany and prioritising rail over air for short business trips.

These actions reflect our commitment to protecting the environment and reducing our ecological impact.

4. Environmental actions and initiatives at sites:

In 2025, environmental awareness and improvement campaigns included:

- **Reforestation and green-area clean-up** in San José Chiapa (Mexico), recognised for contributing to local environmental improvement.
- **Internal** recycling **campaigns** and **electronic-waste management** in San Luis Potosí (Mexico), with documented delivery of 74.22 kg of electronic waste and 0.9 kg of alkaline batteries.

These actions integrate employee awareness and participation into continuous environmental improvement.

METRICS AND TARGETS

E1-4

Targets related to climate change mitigation and adaptation

In 2022 and 2023, TWG measured its Scope 1 and 2 carbon footprint in accordance with the GHG Protocol, with external verification. In 2024, the focus was on adapting systems to incorporate Scope 3 measurement alongside Scopes 1 and 2. In 2025, the quality and coverage of the Scope 3 inventory were strengthened so that it is as complete and representative as possible, expanding available information and improving traceability. On this basis, the Decarbonisation Plan is underway in 2025, aimed at defining a roadmap and targets aligned with recognised frameworks, including the SBTi framework. The main objectives and progress lines for the year are summarised in the Progress Summary of the report (Table 4).

Voluntary targets and means

As part of its participation in Lean & Green (AECOC), TWG has voluntarily committed to reducing GHG emissions linked to logistics by at least 20% within a maximum of five years, with external progress monitoring and verification. To achieve this, the Group acts mainly on the value chain (transport) and its own operations through levers such as route optimisation (software), renewable energy and energy efficiency. These and other actions and resources are detailed in E1-3.

E1-5

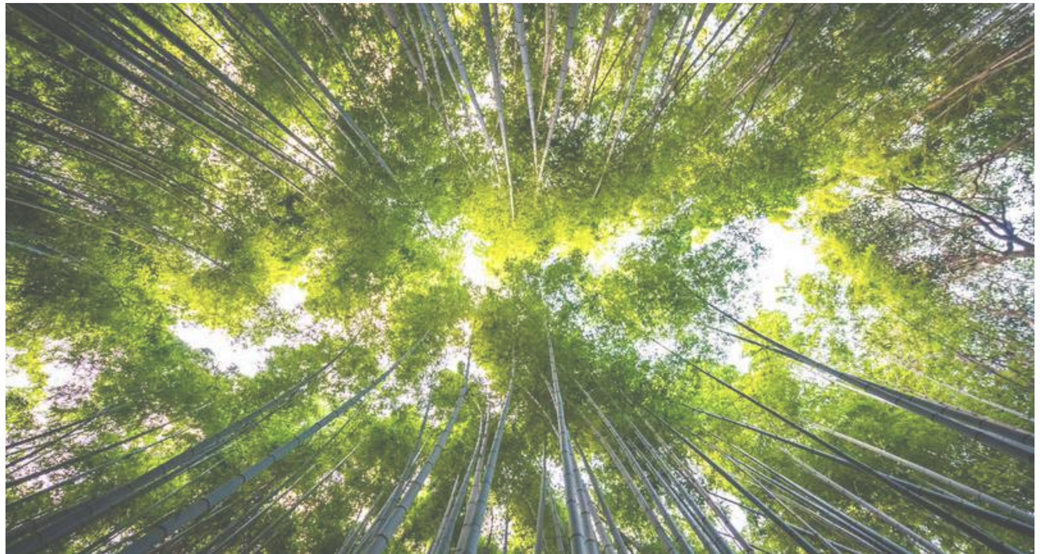
Energy consumption[8,9]

Our energy consumption consists mainly of electricity and fuels (fixed and mobile equipment) used in warehouses and plants. In 2025, total energy consumption was 69,152.54 GJ. Energy-data traceability was strengthened by separating renewable and non-renewable electricity in the GJ calculation, as shown in Table 11:

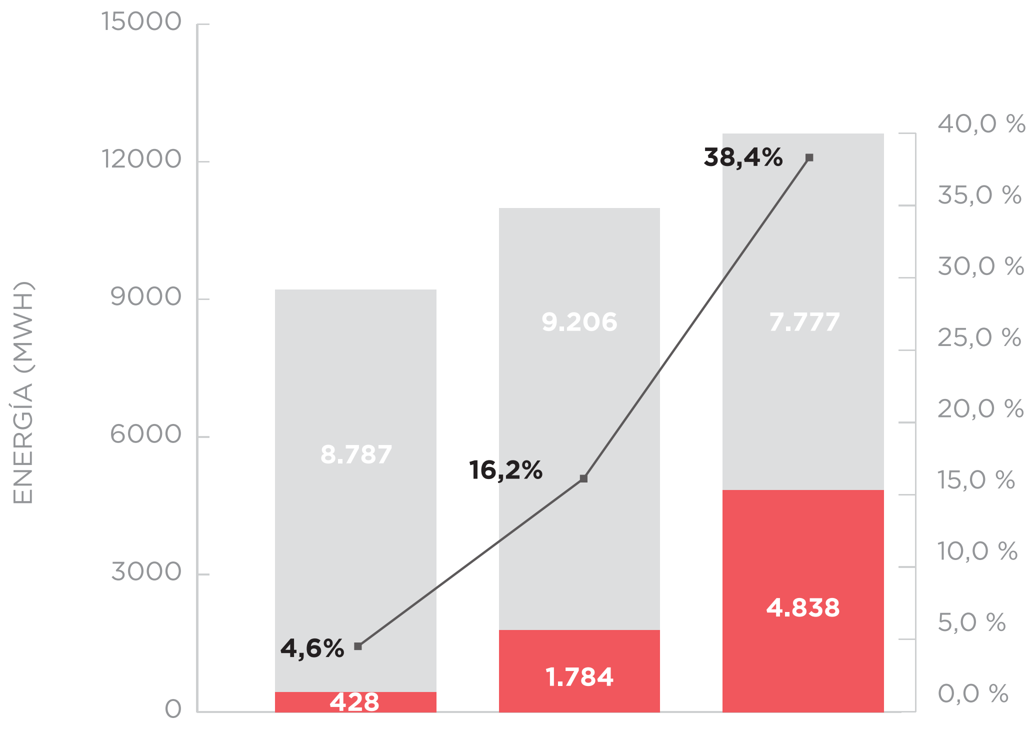
Year	Total energy (GJ)	Renewable electricity (GJ)	Non-renewable electricity (GJ)	Fuels (GJ)	% renewable (electricity only)	Revenue (€m)	Intensity (GJ/€m)
2022	117.902,96	0,00	110.196,00	7.706,96	0,00	252,14	467,61
2023	78.499,87	0,00	71.208,00	7.291,87	0,00	283,60	276,80
2024	50.636,50	0,00	39.562,79	11.073,71	0,00	312,37	162,11
2025	69.152,54	17.417,49	27.996,71	23.738,34	0,25	326,33	211,91

8 Melbourne (Australia) warehouse consumption is not included because the landlords did not provide the data
9 https://www.idae.es/uploads/documentos/documentos_Factores_de_Conversion_E_Primaria_y_CO2_BT%282009%29_fa1d79f3.pdf
.

In 2024, although nine warehouses used certified green electricity, the GJ calculation reported electricity in aggregate. In 2025, 17,417.49 GJ of attributable/certified renewable electricity is reported; the remainder is classified as non-renewable.
In 2025, total energy consumption was12,615.06 MWh = 4,372.09 t CO2e, comprising 4,838.19 MWh of renewable and 7,776.86 MWh of non-renewable energy.
Consumption is based mainly on actual billing and operational records for sites under Group operational control. To widen reporting coverage, 2025 includes estimated electricity consumption for Milton Keynes and Northampton (UK) and Strasbourg (France), where complete prior-year data were unavailable.
Renewable energyrepresented38.4%of total electricity consumption, reflecting progress in the energy transition and improved data traceability. See Table 12 below:



Mix energético (MWh) y % renovable – 2023–2025



	Year 2023	Year 2024	Year 2025
Non-renewable energy (MWh)	8.787	9.206	7.777
Renewable energy (MWh)	428	1.784	4.838
% Renewable	4,6%	16,2%	38,4%

E1-6

Gross Scope 1, 2 and 3 and total GHG emissions

During 2025, we**strengthened data quality and expanded inventory coverage**, incorporating all activity information that could be collected at Group level. Updated, consolidated 2025 values are presented to improve transparency, traceability and representativeness.

Methodologies, significant assumptions and emission factors used to calculate or measure GHG emissions are provided under “Specific notes on ESRS E1”.

Scope1+2

In 2025, Scope 1 and 2 emissions increased versus 2024, mainly because new facilities entered the operational boundary and consumption data became available for sites previously dependent on third-party information. These factors increased reported energy use and affect year-on-year comparability.

Scope 3

Under the GHG Protocol, 2025 Scope 3 measurement includes:

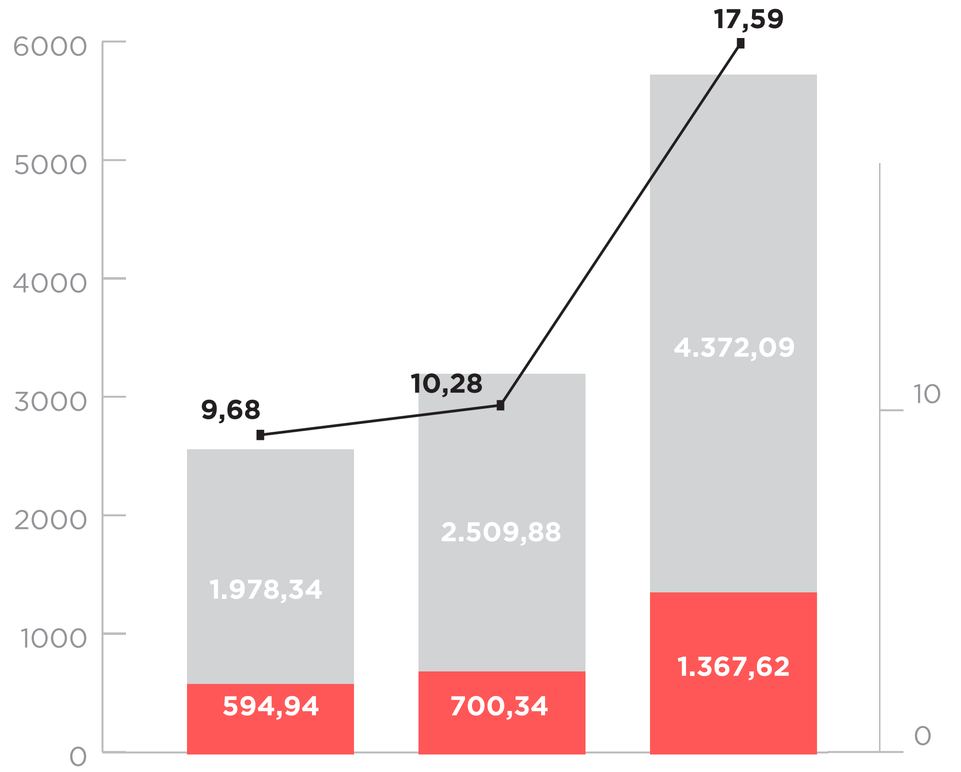
Selected categories

1) Purchased goods and services
2) Fuel- and energy-related activities (transmission and distribution losses)
3) Upstream transport and distribution
4) General waste management
5) Business travel (external)
6) Employee commuting (internal)
7) Downstream transport and distribution

Excluded categories

1) Capital goods
2) Processing of sold products
3) Use of leased products
4) End-of-life treatment of sold products
5) Franchises
6) Investments
7) Upstream leased assets

Evolución emisiones Alcance 1+2



	Year 2023	Year 2024	Year 2025
Scope 2 (t CO-eq)$_2$	1978,34	2509,88	4.372,09
Scope 1 (t CO-eq)$_2$	594,94	700,34	1.367,62
Scope 1+2 ratio (t CO/mill€)$_2$	9,68	10,28	17,59

Scope 1	2025 (t CO2-eq)	2024 (t CO2-eq)	2023 (t CO2-eq)	2022 (t CO2-eq)
From fixed equipment	783,25	194,05	165,00	72,05
From mobile equipment	584,37	506,29	430,00	405,00
Total direct emissions	**1.367,62**	**700,34**	**595,00**	**477,05**
Scope 2				
Indirect emissions from electricity consumption	**4.372,09**	**2.509,88**	**1.978,00**	**3.061,00**
Total indirect emissions	**4.372,09**	**2.509,88**	**1.978,00**	**3.061,00**
Total direct and indirect emissions	5.739,71	3.210,22	2.573,00	3.538,05
Scope 3				
Fuel WTT	819,38	584,00	N/D	N/D
Raw materials	3.728,82	23.782,74	N/D	N/D
Upstream transport	2.320,22	2.774,02	N/D	N/D
Freight transport	191.931,47	83.158,12	N/D	N/D
Waste management	1.088,73	548,89	N/D	N/D
Employee commuting	6.011,69	1.388,83	N/D	N/D
Business travel	523,93	456,58	N/D	N/D
Leases	0,00	137,54	N/D	N/D
Total Scope 3 emissions	**206.424,24**	**112.831,83**	**N/D**	**N/D**
Total Scope 1, 2 and 3 emissions	**212.163,95**	**116.042,05**	**N/D**	**N/D**

In 2025, carbon-footprint-to-revenue ratios increased versus 2024, with the total ratio (Scopes 1+2+3) rising from **371.49 to 650.15 t CO_2e per million euros**. This mainly reflects stronger data quality and broader inventory coverage.

For **Scope 3 – Category 1 (Purchased goods and services)**, an adjustment was made to **TWA** activity data to apply the ownership/control criterion consistently. In 2024, **rims and tyres** were included; in 2025 they were excluded because they are held on consignment and **are not owned by the organisation**. Under GHG Protocol guidance, emissions from materials not owned by TWG are not reported in Category 1. The 2024 comparative figure was therefore updated from 980,632.15 tCO_2e to 23,782.74 tCO_2e. Future reporting will pply this criterion consistently to improve comparability and traceability.

Ratio	2025	2024	Difference 2025-2024	2025-2024 % Diff.
Scope 1 ratio (t CO2-eq/mill€)	4,19	2,24	1,95	86,9%
Scope 2 ratio (t CO2-eq/mill€)	13,40	8,03	5,36	66,7%
Scope 1+2 ratio (t CO2-eq/mill€)	17,59	10,28	7,31	71,1%
Scope 3 ratio (t CO2-eq/mill€)	632,56	361,21	271,35	75,1%

E1-7

↘ GHG removals and mitigation projects financed through carbon credits

TWG has no GHG removals or GHG-mitigation projects financed through carbon credits.

E1-8

↘ Internal carbon pricing

TWG does not apply internal carbon-pricing schemes.

E1-9

↘ Anticipated financial effects of material physical and transition risks and potential climate- related opportunities

TWG has elected the phase-in relief to omit the financial effects required under E1-9.

During 2025, the Group carried out a**comprehensive review of environmental and climate-risk coverage under its insurance policies**to assess protection against physical and transition risks. The review confirmed adequate coverage of the main risks and identified opportunities to improve alignment between operational contingency plans and risk-transfer mechanisms.

Specific notes on ESRS E1

Reporting period

This report covers 1 January to 31 December 2025.

Reporting scope

The report includes all entities under the operational control of **TWG**, as stated in the 2025 Annual Report. Energy and climate data and CO_2e for Scopes 1, 2 and 3 cover **TWG**.

Reporting framework

For CO_2 e reporting, **TWG** follows the Greenhouse Gas Protocol (GHGP).

Recalculations

No recalculations were made

ENERGY AND CLIMATE DATA

The emissions inventory applies the operational-control approach to all greenhouse-gas emissions, expressed in tonnes of CO_2 equivalent (tCO_2e). Quantification follows the GHG Protocol using this general formula for all scopes:

Emissions (CO_2e) = Activity data (AD) × Emission factor (EF)

AD is the activity level generating emissions (e.g. kWh, litres, kg or km); EF is the emission per unit of activity (e.g. kg CO2 e/kWh,kg COe/l).

Factors and global-warming potentials come from official and recognised sources, mainly MITECO 2024, DEFRA 2025 and the GHG Protocol.

Total location-based GHG emissions (tCO_2e) are calculated as:

Total GHG emissions (location-based) = Scope 1 (gross) + Scope 2 (location-based) + Scope 3 (total)

GHG-emissions intensity based on net revenue is calculated as:

GHG-emissions intensity = Total GHG emissions (tCO_2e) / Net revenue (€m)

Scope 1

Data are obtained from fuel consumption associated with:

- Mobile sources (vehicles and combustion forklifts, where applicable)
- Fixed sources at sites (mainly natural gas and diesel for equipment, including generators, fire-system pumps and heating)
- Fugitive emissions from refrigerant top-ups in air-conditioning and refrigeration equipment where data are available.

Activity data (e.g. litres, kWh or kg) are manually collected and verified by site/division environmental managers. Fixed-source data are consolidated from invoices and internal KPI records. Conversion to CO_2e was supported by an external consultancy.

Electricity used by electric forklifts is reported under Scope 2. No proxy estimates were used for Scope 1 in 2025.

Scope 2

Data follow both location-based and market-based approaches. Electricity use is measured in kWh and manually collected and verified by environmental managers from invoices and internal KPI records.

An external consultancy converted the data to CO_2e using the relevant emission factors. In 2025, the market-based approach was used only for Spanish sites, using competent-authority factors and Guarantees of Origin (GoO) where applicable; the location-based approach was used for other international sites except those with GoO. Scope consolidation follows operational control; electricity for which TWG has no control or verifiable data is excluded from Scope 2 and estimated where possible.

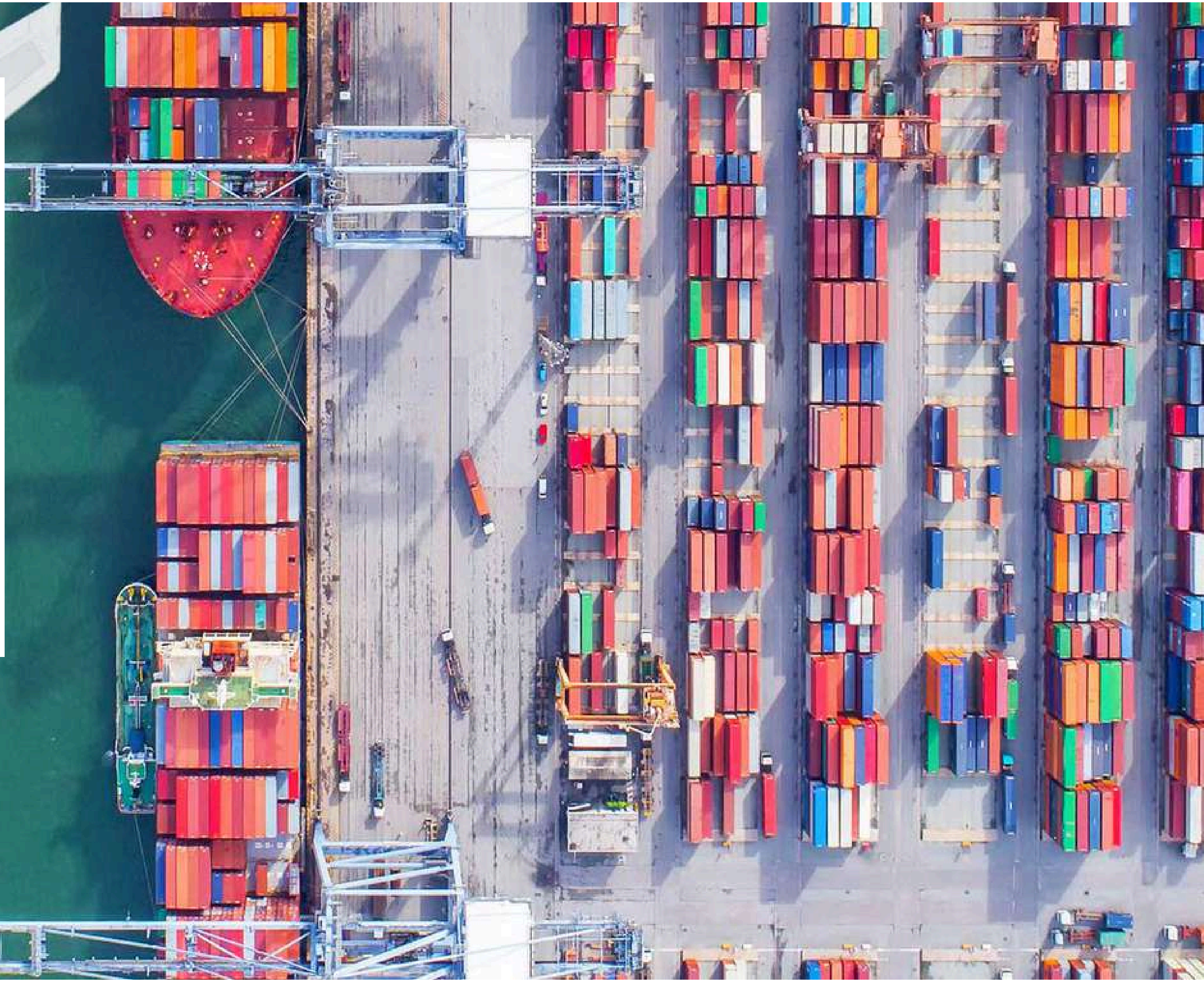
In 2025, electricity consumption was estimated for Milton Keynes, Northampton (UK) and Strasbourg (France).

Scope 3

Scope 3 data were calculated under the GHG Protocol using relevant value-chain categories and the activity-data × emission-factor method, with conversion to CO_2e by an external consultancy. 2025 categories include: (1) purchased goods and services, based on key raw-material consumption by mass and divisional KPIs, with unit-to-mass conversion where needed; (3) fuel- and energy-related activities, based on Scope 1 and 2 fuel/electricity data; (4) upstream transport, based on supplier kilometres/tonnes and TWG TMS/local activity data using a verified methodology; (5) waste management, based on waste-manager certificates and documentation; (6) external travel, based on supplier travel and overnight-stay data; and (7) internal travel, based on a 160-response digital survey extrapolated to the workforce using 250 working days and transport-mode factors.

EU TAXONOMY DISCLOSURE

The EUTaxonomyisanessential tool for advancing the objectives of the European Green Deal towards a carbon-neutral and sustainable economy by defining sustainable economic activities precisely and consistently. **TWG**'s Finance team has analysed our operations and identified specific sub-activities for inclusion in the Taxonomy and continues to monitor EU Taxonomy regulation. Our reporting will be adjusted and expanded in line with regulatory and practical developments. **TWG** relies on its financial systems, which provide detailed data on divisional activities, business units and accounts, as the basis for assessing Taxonomy-related disclosures. These information systems are complemented by assessments of **TWG**'s different economic activities and investments to avoid duplication.



E2

POLLUTION

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

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

ESRS 2 SBM-3

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

Non-GHG pollutants are emitted in our value chain and create an actual negative impact on air quality. These include nitrogen oxides (NOx), sulphur oxides (SOx), non-methane volatile organic compounds (NMVOCs) and particulate matter released from fossil-fuel combustion by road-transport vehicles. Once released, these pollutants contribute to deteriorating air quality.

E2-1

Policies related to pollution

The Environment, Quality and Occupational Health & Safety Policy commits TWG to comply with applicable laws, regulations and legislation covering air quality, water quality and consumption, responsible handling of chemicals, sustainable resource management and waste reduction. TWG is committed to informing customers about environmental challenges, supporting them in reducing their CO2 footprints and influencing suppliers to choose low-CO2 solutions whenever possible, which also reduces air pollution in our supply chain. We also have a Sustainable Procurement Policy that promotes lower emissions in our supply chain. The policy is binding on all employees in every country where we operate. All employees receive mandatory training on our Environmental Policy to familiarise themselves with its content, company initiatives, objectives and general responsibilities as a global organisation. The Group's Sustainable Travel Policy establishes common criteria to minimise the environmental impact of business travel while promoting operational efficiency, safety and responsible use of resources. It prioritises more sustainable modes of transport, rationalises travel and promotes digital alternatives where possible, helping reduce emissions, meet ESG commitments and build a corporate culture aligned with sustainable development.

E2-2

Actions and resources related to pollution

To address air pollution in the value chain, TWG is measuring emissions caused by carriers through the actions described under 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, NMVOCs and particulate matter. Further information on TWG's climate-mitigation actions is provided in E1-3. TWG has civil-liability and accident insurance covering pollution arising from our activities, together with the corresponding Contingency Plans.

Strengthening our environmental management system

Most of the TWG organisation is covered by our multi-site ISO 14001 certification, which provides a framework for our environmental management system.

Environmental training and investment

During 2025, 703 hours of environmental training were delivered, an increase of 33 hours (+4.9%) compared with 2024. This training represented 2.41% of total annual training
hours and had an associated cost of €1,478.80. In addition, €21,692.98 was invested in two dedicated environmental insurance policies for Spain and the United States. Certain Group general-liability policies also include environmental clauses (e.g. accidental/sudden pollution, environmental damage and/or remediation costs), with limits and sub-limits varying by country.

METRICS AND TARGETS

E2-3

Targets related to pollution

TWG's science-based targets for reducing Scope 3 emissions will also reduce air pollution in its value chain. With this in mind, TWG plans to implement the following during 2026:

- **Route-optimisation** software: this will reduce kilometres travelled and is expected to lower emissions by around 17%.
- **Transition** to renewable energy: TWG is progressively moving warehouses under operational control to renewable electricity and is working to reach agreements with landlords at sites where energy management is not directly controlled by the Group, with the aim of maximising green-energy coverage across all operations.

E2-4

Air pollution

All non-GHG pollutants (NOx, VOCs, PM10, PM2.5 and SO2) originate in TWG's value chain. TWG therefore does not hold data on the quantities of these pollutants or changes over time.

FINANCIAL EFFECTS OF POLLUTION-RELATED RISKS AND OPPORTUNITIES

E2-6

Anticipated financial effects of material pollution-related risks and opportunities

TWG has elected to use the phase-in provision 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. **ADDITIONAL COMPLEMENTARY INFORMATION – ESRS E3, E4 & E5**

E3

WATER AND NATURAL RESOURCES[10]

Although water consumption is not a material topic for **TWG**, we carry out improvement initiatives to minimise use of this resource. Water is supplied by the municipal network in the areas where we operate, so no water source is affected. Wastewater is generated by sanitary use and discharged to the sewer network, as we operate only in industrial estates. As shown in the following table, in 2025 the water-consumption-to-revenue ratio increased by 8.22 m^3/€m compared with 2024. Nevertheless, the ratio remains significantly better than in 2023 and 2022. In addition, 2025 data coverage was expanded to include consumption at Cabanillas TW1 and TW2, Seville and Illescas, which had not been included in 2024 because landlord invoices were unavailable. The Legal team continues to work on including a contractual requirement to ensure detailed water-consumption data are available for warehouses where this information is still missing (see footnote).

10 The following consumption is not included because landlord invoices were unavailable: Cabanillas TW3, TW4 and TW5, Cabanillas TW Parts, Larrabetzu, Milton Keynes and Northampton (UK), Strasbourg, Tigery and Survilliers (France), and Melbourne and Sydney (Australia).

	Units	2025	2024	2023	2022
Mains water consumption	m3	9.051,54	9.744,96	6.702,49	8.530,47
Reused water consumption	m3	12,61	23,01	21,41	N/D
Total	m3	9.064,15	9.767,97	6.723,90	8.530,47
Ratio vs. revenue	**m3/mill**	**27,78**	**19,56**	**41,12**	**59,94**

E4

BIODIVERSITY AND ECOSYSTEMS

Our sites are not located in or adjacent to protected areas. Before a new warehouse or plant is established, an Environmental Impact Assessment (EIA) is carried out and approved by the competent authorities, and all relevant permits and licences are obtained. We also hold **ISO 14001** certification, which ensures regular monitoring and compliance. No environmental emergencies occurred during the reporting year. **TWG** has environmental liability insurance.

E5

CIRCULAR ECONOMY

E5-4

Resource inflows

Our activities use limited raw materials for own manufacturing. In logistics, consumption is mainly auxiliary and packaging materials—paper, stretch film, plastic, wood, cardboard and foam—purchased under the Group's Sustainable Procurement Policy, prioritising recyclable and recycled-content materials where possible. Customer technical and operational requirements may determine the final material choice.

In wheel assembly, the main materials (e.g. tyres, rims, counterweights and valves) are supplied by

customer-selected suppliers, so volumes and packaging depend on assemblies performed rather than Group procurement decisions.

In 2025, reported auxiliary and packaging-material consumption was 989.16 t versus 1,198.77 t in 2024, a 17.5% decrease. This reduction is strongly affected by the 2024 "non-recycled office paper" figure, which is not fully comparable with 2025 because of data-capture/conversion adjustments and improved traceability. For a more representative operational comparison, excluding office paper (recycled and non-recycled), consumption of film, plastic, wood, cardboard and foam rose from 842.42 t in 2024 to 955.00 t in 2025, anincrease of 13.36%. This reflects broader 2025 reporting coverage, with information from more suppliers and therefore more representative data.

We also continued incorporating circularity criteria into procurement and monitoring recycled content in packaging materials. In 2025, recycled content increased in plastic, wood and office paper, representing an **aggregate 18.4% increase in recycled material** versus the previous year.

0

Item	Unit	TWA	TWL
Process soap	Lts	14752,00	N/D
Non-recycled office paper	Tons	2,78	0
Recycled office paper	Tons	0,84	30,55
Non-recycled stretch film	Tons	0,8	122,56
Recycled stretch film	Tons	N/D	13,08
Non-recycled plastic	Tons	N/D	16,09
Recycled plastic	Tons	N/D	51,71
Non-recycled wood	Tons	N/D	20,18
Recycled wood	Tons	N/D	218,38
Non-recycled cardboard	Tons	N/D	429,07
Recycled cardboard	Tons	N/D	82,72
Non-recycled foam	Tons	N/D	0,28
Recycled foam	Tons	N/D	0,03
Counterweights	Tons	205,28	N/D
Tyres	Units	4855,62	N/D
Rims	Units	4856,72	N/D
Rubber valves	Units	2164,78	N/D
TPMS valves	Units	2658,28	N/D

N/D = Not disclosed

	2025		2024	
	% Recycled	% Non-recycled	% Recycled	% Non-recycled
Office paper	8,14%	91,86%	1,92%	98,08%
Stretch film	9,59%	90,41%	12,11%	87,89%
Plastic	76,16%	23,84%	29,70%	70,30%
Wood	91,54%	8,46%	73,68%	26,32%
Cardboard	83,84%	16,16%	88,84%	11,16%
Foam	10,61%	89,39%	30,04%	69,96%
% Total	72,29%	27,71%	55,50%	44,50%

Looking ahead, we will continue working with Procurement and the supply chain to favour higher recycled content and strengthen traceability by material type, improving year-on-year comparability.

E5-5

Resource outflows

99.42% of **TWG** waste is comparable to municipal waste. Group facilities therefore use **dedicated containers** for selective segregation of paper, packaging, organic waste and batteries, supporting separation at source and the waste hierarchy. Employees are encouraged to make **responsible use of materials** and use paper only when strictly necessary.

Our IT department reuses equipment and components where possible to extend their useful life. All workplaces also hold the required waste-management authorisations.

Each waste collection is recorded by responsible staff in the **waste register**, including origin, type, quantity and final destination. This enables real-time analysis, environmental-performance monitoring, reporting and documentary evidence for compliance. Site environmental managers use these data to **promote circularity**.

Waste information is consolidated and assessed byTWL and TWAthrough thecorporate sustainability platform, while theSustainability Committee (CSOS)reviews results and defines improvement initiatives.

In summary, Group waste management is based on these **key principles**:

- **Comply** with the **Sustainable Procurement Policy** and the **Environmental Policy**.
- Promotewaste **reduction** in offices through training led by TWL and TWA environmental managers.
- **Ensure** proper management of Group waste,hazardous and non-hazardous, with segregation at source and delivery to authorised managers and systems.
- **Build strategic partnerships** with customers to promote recycled materials and more circular solutions.

As a result, in 2025 TWG generated **5,906.44 tonnes of waste**, of which 5,872.15 t was non- hazardous and 34.29 t hazardous. Of the total, 5,125.51 t went to recovery and 475.38 t to disposal; final-treatment information was unavailable for the remainder. The 92% recovery rate is therefore calculated on waste with identified treatment.

Compared with 2024, total waste increased 3.2%, from 5,720.84 t to 5,906.44 t. The **recovery rate increased from 91% to 92%,**reinforcing the Group's focus on recovery over disposal. Recent work has improved the availability, consistency and traceability of reported data and strengthened documentary support across sites.

In recent years, TWG has progressively improved the availability, consistency and traceability of reported waste data, strengthening documentary support and data quality across its sites.
Looking ahead, despite the reduction observed in 2025, TWG will continue strengthening waste-prevention measures, source segregation and recovery, prioritising reusable products under the Sustainable Procurement Policy and promoting further employee awareness and training.

	NHW Disposal (t)	NHW Recovery (t)	HW Disposal (t)	HW Recovery (t)	Total Waste (t)	% Total Recovery
2021	2.064,50	2.186,76	3,87	10,71	4.265,84	52%
2022	2.790,83	1.370,90	18,93	0,00	4.180,66	33%
2023	872,77	1.909,87	18,71	4,67	2.806,02	68%
2024	540,67	5.163,00	2,47	14,70	5.720,84	91%
2025	471,10	5.146,93	5,65	35,04	5.658,71	92%

Social information ESRS S1, S2 and S3

10

1. 10. Social information ESRS S1, S2 and S3.

People

S1

OWN WORKFORCE

2.255
Employees
(+29% vs. 2024)

34% | 66%
Women | Men

+30%
employees with disabilities

25,80%
women in decision-making positions

+16%
hours of Health& Safety training

Implementation of new people-management system

Implementation of OES project (Operational Excellence System)

In line with our objective to **generate a positive impact**, we have defined a **roadmap** oriented toward responsible people management, which is structured around the following lines of action:

1. Commit to implementing a new **HR and occupational health and safety management program** at the group level.
2. **Develop** and implement the **OES (Operational Excellence System) model** in Logistics.
3. **Local talent recruitment**: Driving local employment to leverage the knowledge and capabilities of our surroundings, contributing to the economic and social development of the communities where we operate.
4. **Mapping of local laws and regulations:** Identifying and monitoring the applicable legal and regulatory frameworks in each country to ensure compliance and mitigate associated risks, in coordination with the legal department.
5. **Promoting a diverse and inclusive culture**: Developing and applying policies and procedures that ensure people's health, well-being, and professional development, while fostering continuous training across all levels and areas of the organization.

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

ESRS 2 – SBM-3

S1

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

As a rapidly expanding company, we operate dynamically in a changing environment. This supports agile growth, but requires an appropriate balance between operating capacity and the resources available to our people.

Our double-materiality analysis identifies physical-injury risks in warehouse and assembly operations, together with risks associated with machinery and chemicals. As a Group response, we deploy Driving Wellness Together (DWT), a corporate programme integrated into our ISO 45001 management system, focused on prevention, healthy habits, operational standardisation through OES and risk-based training. See S1-4, S1-13 and S1-14.

The Group has also begun **digitising Human Resources and occupational health and safety** management through the progressive implementation of a common **management system** integrated across all Group companies. The project provides an **view of the employee lifecycle and strengthens preventive** management and occupational health and safety monitoring.

The new system will **standardise key HR processes**, improve data traceability, reduce operational and administrative risks and reinforce regulatory compliance across countries. It will also support training, document management, job-specific risk prevention, social indicators and data-driven decision-making.

For employees, the project improves clarity, accessibility and consistency, strengthens internal communication and supports fairer management. For the business, it is expected to increase efficiency, reduce administrative burdens and support orderly, sustainable growth.In Spain, our sites also use an **external prevention service** and **hold ISO 45001 certification**, helping to systematically minimise occupational health and safety risks, as described in S1-14.

Sector seasonality also leads to high **employee turnover**, with related operating costs and social impacts.

To mitigate these effects, we focus on i**ntensive training, professional development opportunities and improved work organisation**, as described in S1-13.

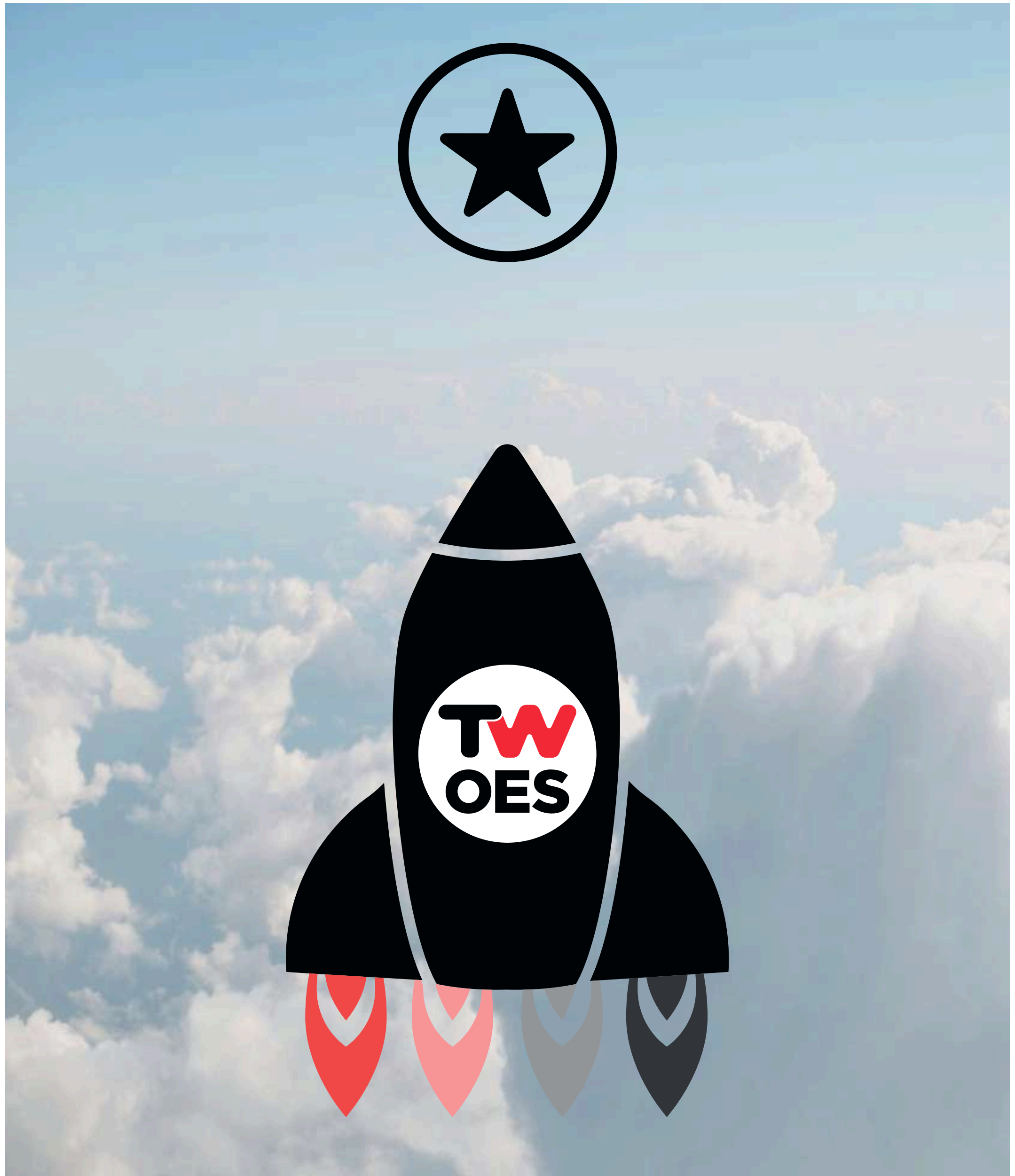
The Group has launched **OES (Operational Excellence System)**, a strategic initiative designed to strengthen operational **efficiency, employee engagement and business sustainability.** The model places people at the centre of continuous improvement through active listening, clear roles, achievable objectives and direct team participation in operational and organisational improvements.

From a social perspective, OES has a **direct positive impact on people,** supports more orderly, safe and predictable workplaces, reduces pressure caused by inefficiencies and strengthens skills through training, coaching and shared responsibility. It also supports motivation, belonging and talent retention in a sector with high seasonality and warehouse turnover.

From a business perspective, OES improves **productivity, service quality and decision-making** by standardising key processes, reducing errors and increasing transparency.

This strengthens organisational resilience and creates a stronger foundation for sustainable long-term growth.

TWG also carries out **periodic security audits** and maintains incident-management procedures to identify weaknesses in data protection and respond quickly to potential data breaches. Further information is provided in S1-4.



S1-1

↘ Policies related to own workforce

At **TWG, we are committed to a workplace based on employee wellbeing and leadership,** promoting health and safety and maintaining zero tolerance for bullying, harassment, discrimination and offensive behaviour. This applies to all employees and covers social life, work organisation and the physical environment.

Our **approach to working conditions is guided by our Code of Ethics,** supported by the **Human Rights Policy, Inclusion, Diversity and Equality Policy, Harassment Protocol and CSR Policy.** These policies commit us to respecting human rights and eliminating modern slavery, forced labour, human trafficking and child labour, in line with ILO principles, while complying with applicable working-time, wage and benefits requirements.

HR managers in TWL and TWA ensure that employees receive the induction and training required for their roles and on Human Rights. They report to TWG's Vice-President & CHRO, who leads the mission to attract and retain talent, create a great place to work and promote equal opportunities in line with the **CREATING POSITIVE IMPACT** strategy.

The following sections explain in greater detail how HR ensures implementation of this strategy.

During 2025 we began redesigning our employee Welcome Manual, with the aim of digitising it in 2026.

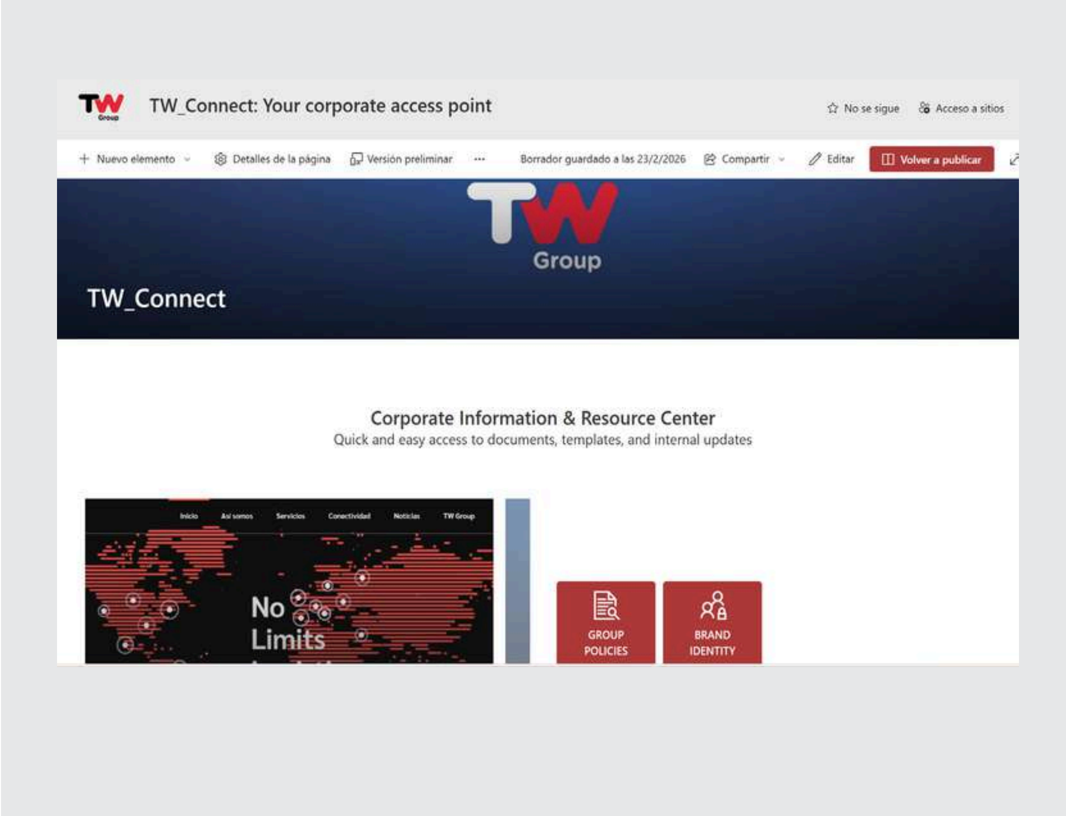
Our Equal Opportunities Policy commits us to treating employees and applicants equally, without discrimination based on race, colour, religion, sex, national origin, age, sexual orientation, disability or other protected status. We prohibit harassment and discrimination and provide reasonable accommodations for employees with disabilities.

We have equality plans in place and are currently developing LGBTI plans.

Physical-safety guidelines, including emergency and incident-investigation procedures, are set out in our Integrated **Environment, Quality and Occupational Health & Safety Policy** and supported by **Driving Wellness Together.**

Regional Directors and Managers are responsible for implementation at warehouses and plants. TWA and TWL Environment, Quality and Occupational Health & Safety managers review performance and relevant KPIs monthly and validate or request additional training where needed.

Policies are communicated to employees and available at hubs and plants. **TW Connect** also provides access to Group policies and procedures, while the **Compliance Committee** remains available for questions. See **G1** for further information.



The IRO analysis has identified the main social-management areas and the key measures designed to strengthen work organisation, employee wellbeing and talent development. The following table summarises these priorities.

S1-2 *Processes for engaging with the workforce and employee representatives regarding impacts.*

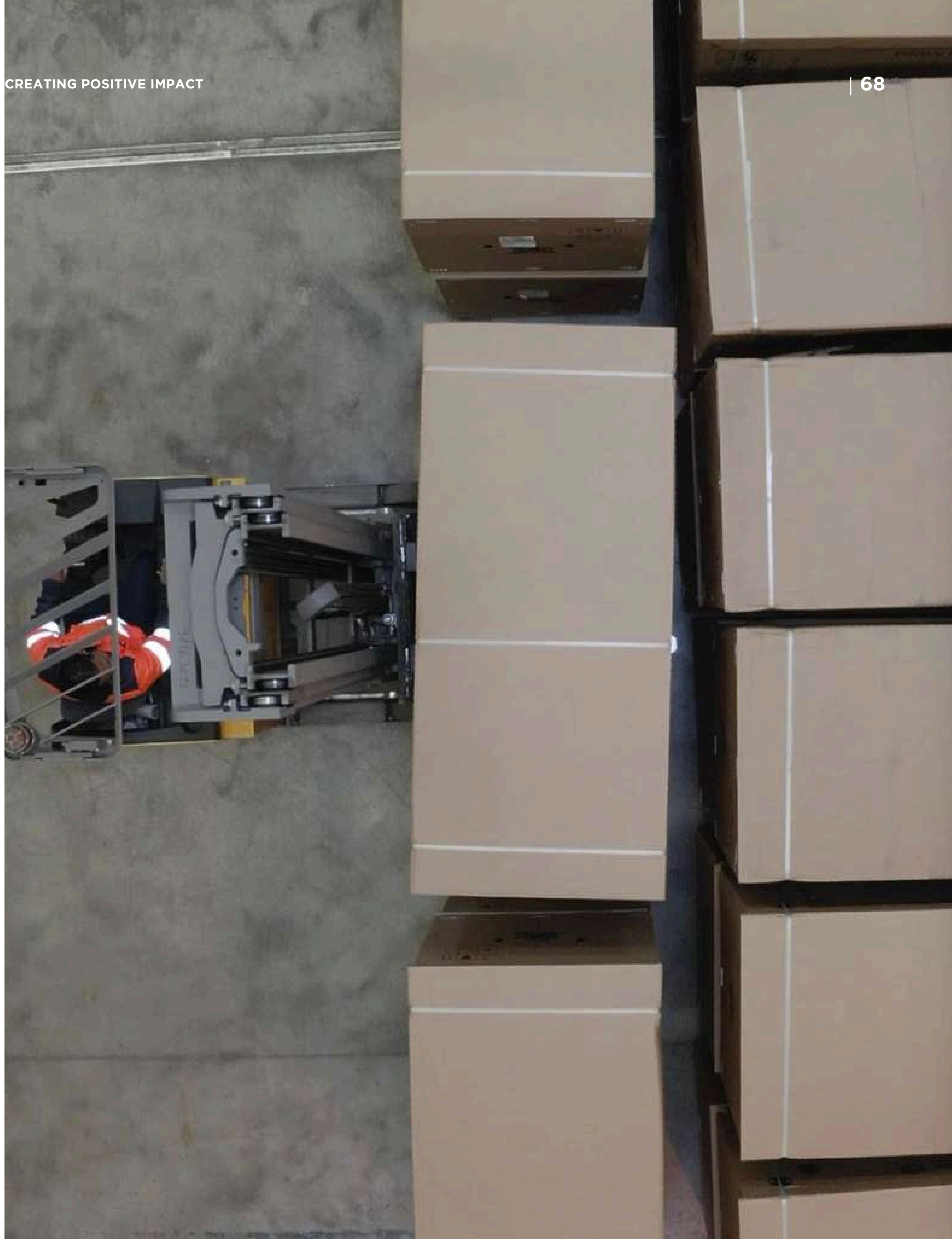
All Group employees may raise their concerns with their **immediate supervisors**. Furthermore, regarding potential violations of the **Code of Ethics (CE)** or related corporate policies, employees and third parties may use the **confidential Ethics Hotline**, the operation of which is described in **Section 11 (G1)**.

During fiscal year **2025**, the Group conducted performance **evaluations for a significant portion of its workforce. We increased the number of performance evaluations conducted by 71% (169)** With the aim of strengthening talent management and professional development, the Group has set a goal for 2026 to increase this percentage by 100% through the gradual implementation of the **corporate people management tool**, which will enable the systematization of this process and improve its monitoring.

Likewise, the Group plans to implement **exit interviews** in order to better understand the causes of voluntary departures and identify potential areas for improvement in people management. During the fiscal year under review, there were **233 voluntary departures**, which underscores the importance of analyzing the causes of these departures and adopting, where appropriate, measures to improve talent management and the work environment. The Group's total **involuntary turnover rate is 25.78% (**excluding investee companies),

With regard to employee representation, the Group currently has **8 Works Councils**, located in **Spain (2), France (4), and Sweden (2)**. These representative bodies address issues related to **working conditions, work organization, equality plans, and other initiatives related to well-being and diversity in the workplace**. The frequency of meetings varies depending on the regulations and practices of each country.I

In countries where there are no formal employee representation bodies, the Group plans to strengthen mechanisms for dialogue with employees in **2026** through various initiatives coordinated by the **Human Resources** department, under the direction of the Group's **VP & CHRO**, including:



- Regular meetings with HR directors, aimed at facilitating direct dialogue and the communication of concerns or suggestions for improvement.
- Anonymous internal surveys, designed to gather employee feedback

These initiatives are designed to **strengthen active listening and promote a workplace based on dialogue, transparency and continuous improvement.**

S1-3

↘ Processes to remediate negative impacts and channels for own workforce to raise concerns

Employees are encouraged to report concerns or complaints related to harassment, suspected legal or financial irregularities or other issues to their immediate supervisor, HR or the Ethics Channel managed by the Compliance Committee, described in **G1-1.** Reports may be made safely and anonymously in accordance with the Ethics Channel rules.

S1-4

↘ Actions and resources – effectiveness of Health & Safety management

Driving Wellness Together (DWT) is TWG's corporate health and wellbeing programme for all employees. It is integrated into ISO 45001 and aligned with the Luxembourg Declaration.

2025 priorities include ergonomics and healthy habits, health surveillance and campaigns, OES-based operational standardisation and participation/reporting channels, including an incident platform with traceable corrective actions.

Coordination is shared by Sustainability, HQSE and HR, supported by local managers and Health & Safety Committees. ISO 45001 and the external prevention service in Spain provide the documentary framework, audits and improvement plans.

DWT is assessed through objective-based indicators and ESRS S1-14 performance indicators. In 2025, TWG delivered 10,113.47 hours of Health & Safety training and carried out 1,490 health examinations.
Within DWT, in Navarra we also promoted participation in "Desafío Empresas", a local sports initiative encouraging physical activity and team cohesion.

Driving
Wellness together.

Our own workforce health and safety was identified as a material topic in the double- materiality assessment. We remain focused on employee health and wellbeing. TWG joined the Luxembourg Declaration in 2024 and maintains ISO **45001:2018** certification, supporting consistent occupational health and safety management.

Our Environment, Quality and Occupational Health & Safety Policy was updated in 2024 to align with company strategy. TWA and TWL Health & Safety managers monitor procedures and results. All incidents are reported through the Health & Safety Management System, investigated and reviewed with clients and other relevant stakeholders. **The Group currently has seven Health & Safety Committees.**

During 2025, measures were launched across Group sites to **strengthen coordination, monitoring and prevention.** The Health & Safety function was **reinforced** and periodic site **meetings** led by the Group Health & Safety manager **review** incidents, improvement areas and outstanding preventive actions.

Throughout 2025, specific **initiatives** have been developed at various Group locations aimed at promoting health, prevention, and awareness:

- **Sydney (Australia):** An occupational health and safety initiative has been implemented consisting of morning stretching sessions. This activity, led by the local team and with the participation of the OES project manager, is designed to encourage healthy habits, improve mobility, and foster connection and well-being among team members at the start of the workday. The session helps keep employees active and reinforces a culture of prevention in the workplace.
- **Pilsting (Germany)**: Individual back and mobility checkups to assess muscle strength and mobility of muscle groups, as a complementary preventive measure.
- **San Luis Potosí (Mexico):**

•Vaccination campaign (influenza, COVID-19, tetanus, and hepatitis B) in coordination with the IMSS, aimed at preventing contagious diseases.

•Visual acuity screening campaign to identify needs for correction or follow-up.

•Awareness campaign on chemical safety, reinforcing the interpretation of hazard pictograms in accordance with NOM-018-STPS-2015.

•Donation of medications to the “Dr. Nicolás Aguilar” Geriatric Institute, contributing to the well-being of older adults in the community.

- **San José Chiapa (Mexico):**

•Flu vaccination campaign, facilitating access to preventive health measures.
•Awareness-raising activities as part of International Breast Cancer Awareness Day, aimed at increasing awareness about prevention and early detection.

Safety signage was improved at warehouses and operating facilities, and occupational-risk prevention is being integrated into the future corporate HR management tool to strengthen training, preventive controls and safety indicators.

Additional **safety-awareness** campaigns are also being prepared to reinforce preventive culture and safe behaviours. These initiatives form part of the Group’s commitment to employee health and safety and continuous improvement of working conditions.

See additional Health & Safety measures in **S1-14.**

The seasonal nature of **TWG** operations creates periods of high and low demand and therefore temporary hiring. To counter turnover, **TWG** invests in employee training and development (see **S1-13**). Continuous learning helps employees adapt to business and market changes and supports attraction and retention.

With **more than 2,000 own employees**, **TWG** manages a significant amount of personal data. A potential data breach could result in costs, fines, litigation and loss of employee trust. We therefore collect only essential information and use encryption technologies to protect sensitive data in transit and at rest.

CERTIFICADO DE ADECUACION AL RGPD Y LOPD GDD

Prodana Consultores

Certificado de Adecuación al RGPD Y A LA LOPD GDD: REGLAMENTO (UE) 2016/679 Y A LA LEY ORGANICA DE PROTECCION DE DATOS Y GARANTIA DE LOS DERECHOS DIGITALES 3/2018, relativo a la protección de las personas físicas en lo que respecta al tratamiento de datos personales y a la libre circulación de estos datos.

PRODANA CONSULTORES S.L. COMO DPO INFORMA QUE LA ENTIDAD

TRUCK AND WHEEL GROUP SL

- Se han incorporado las cláusulas legales informativas en toda la documentación en la que se recogen datos personales.
- Se ha realizado el Registro de Actividades del Tratamiento, tanto como responsable del tratamiento, como encargado del tratamiento, en su caso.
- Se han firmado todos los contratos de acceso a datos por cuenta de terceros con los encargados del tratamiento.
- Se han establecido Protocolos de Atención a los Derechos de los ciudadanos.
- Se han incorporado el Registro de incidencias y el Registro de las notificaciones de las violaciones de la seguridad a la Autoridad de Control, en su caso.
- Todos los trabajadores con acceso a datos personales han sido informados de sus funciones y obligaciones y han firmado el Compromiso de Confidencialidad y Secreto.
- Se han implantado las medidas de seguridad recogidas en el Documento de cumplimiento, en función del análisis de riesgos realizado, que han de aplicarse a los tratamientos de datos personales que se están tratando para asegurar un nivel de seguridad adecuado al riesgo.

Adecuación: 15/06/2025

prodana@prodanaconsultores.com

TWG has both an Information Security Management Policy[11] and a **Data Protection Policy compliant with GDPR**[12]. An **external DPO** - dpo@tw-group.com - supports Spain, Portugal and Mexico, while external legal counsel supports the remaining countries under the oversight of the Spanish data-protection function. No data-privacy communications were received in 2025.

S1-5

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

In 2025, the Group continues to prioritize progress toward a goal of zero accidents (and, in particular, zero serious injuries), given that the double materiality analysis identifies risks of physical harm in warehouse and assembly operations,as well as risks associated with the use of machinery and chemicals, which require enhanced and systematic preventive management.

During the fiscal year, there were **59 work-related accidents resulting in lost time, 83 without lost time,** and 1 occupational illness, reinforcing the need to consolidate a continuous improvement approach aimed at reducing the likelihood and severity of incidents.

To achieve this objective, the Group relies on the framework of its **OHS management system** (including ISO 45001 certification) and on strengthening preventive measures basedon training, health monitoring, operational standardization, and incident reporting.

In 2025, 10,147.47 hours of Health and Safety training were provided, and 1,603 health examinations were conducted, reinforcing the preventive approach and the monitoring of the workforce's health.

Furthermore, as mentioned in previous sections, the Group is developing. and planning the phased rollout of the corporate program **"Driving Wellness Together"** (DWT) as a lever to advance toward the goal of "zero accidents," establishing preventive action plans (ergonomics and healthy habits, health care, operational standardization, and strengthening of participation and reporting channels) and facilitating the standardization of practices across facilities.

In addition, and to strengthen the capacity for control and traceability in preventive management, the Group is promoting the implementation of a new corporate-level HR and occupational health and safety management program, **along with the development of the OES model,** in order to support orderly growth and reduce associated operational risks.

Progress toward this objective is monitored through the performance and occupational health indicators reported in S1-14 (accident rate, occupational diseases, and other related indicators), as well as through the tracking of corrective and preventive actions resulting from incidents and internal inspections.

11 Information Security
12 General Data Protection Regulation

S1-6

Characteristics of the company's employees

Headquartered in Pamplona, TWG operates in nine countries across Europe, the Americas and Oceania. Average headcount increased 28.6% year on year. Women represent 34% and men 66%. Average total headcount was 2,255: 1,675 own employees and 580 temporary-agency workers.

	YEAR 2025			YEAR 2024		
Distribution by country and gender	**Women**	**Men**	**Total**	**Women**	**Men**	**Total**
SPAIN	516	720	1236	461	508	969
FRANCE	63	225	288	46	119	165
PORTUGAL	14	74	88	12	30	42
GERMANY	25	63	88	25	46	71
USA	15	55	69	13	46	59
MEXICO	102	260	362	97	270	367
SWEDEN	15	62	77	51	17	68
UK	5	9	14	5	8	13
AUSTRALIA	11	23	33			
Total employees by gender	**766,00**	**1.491,00**	**2.255,00**	**710,00**	**1.044,00**	**1.754,00**
Percentage of employees by gender	34%	66%	100%	40%	60%	100%

The distribution of employees by professional category is shown below. Operators represent **78.53%** of the workforce, **middle managers 9.44%, administrative employees 9% and executives 3%.**

Women hold 25.80% of decision-making positions (executives and middle managers with teams).

Distribution by professional category and gender	**YEAR 2025**				**YEAR 2024**			
	Women	**Men**	**Total**	**Difference 2025 vs. 2024**	**Women**	**Men**	**Total**	**Difference 2024 vs. 2023**
Executives and Managers	12	54	66	1	12	55	67	67
Middle managers and qualified technicians	60	153	213	23	66	170	236	236
Administrative employees	115	90	205	3	110	98	208	208
Operators	577	1194	1771	-528	522	721	1.243	1.243
Total	**764**	**1491**	**2.255,00**	**-501**	**710**	**1.044**	**1.754**	**1.754**

Group

68% of contracts are permanent and 83% are full-time.

	AÑO 2025	% del total	AÑO 2024	% del total	AÑO 2023	% del total	Diferencia 2024 vs 2023	Diferencia Año 2024 vs. Año 2023 %	AÑO 2022	AÑO 2021	Diferencia 2024 vs 2021
Permanent	1536	68%	1.518	86,5%	1.234	92,2%	284	23,0%	1.103	1.030	488
Temporary	719	39%	235	13,4%	101	7,5%	134	132,7%	84	142	93
Paid internship/traineeship	0	0%	1	0,1%	4	0,3%	-3	-75,0%	-	-	1
Total	**2255**	**100%**	**1.754**	**100,0%**	**1.339**	**100,0%**	**415**	**31,0%**	**1.187**	**1.172**	**582**
Full-time	1865	83%	1.421	81,0%	1.294	96,6%	127	9,8%	1.154	1.159	262
Part-time	390	17%	333	19,0%	45	3,4%	288	640,0%	33	13	320
Total	**2255**	**100%**	**1.754**	**100,0%**	**1.339**	**100,0%**	**415**	**31,0%**	**1.187**	**1.172**	**582**

Average seniority is 4 years and 3 months.

	YEAR 2025		YEAR 2024	
	Years	Months	Years	Months
España	4	4	5	1
USA	4	4	3	4
México	3	8	3	4
UK	3	3	5	11
Francia	5	0	4	9
Alemania	3	6	2	9
Portugal	4	1	3	11
Suecia	4	11	4	3
Australia	0	6		
AVERAGE SENIORITY:	**4**	**3**	**3**	**8**

The following analysis details turnover during the year. The increase is partly affected by the turnover rate of one investee company. Taking this into account, **the Group's unwanted turnover rate** was 39.33% when voluntary departures and dismissals are included.

Departures	**AÑO 2025**	**AÑO 2024**	**AÑO 2023**	**AÑO 2022**
Voluntary departure	613	325	398	284
Dismissal	274	226	141	192

Departures by gender	**YEAR 2025**	**YEAR 2024**	**YEAR 2023**	**Difference 24 vs 23**	**Difference 2025 vs 2024**
Women	589	191	122	69	398
Men	450	360	417	-57	90

Departures by age	**YEAR 2025**	**YEAR 2024**	**YEAR 2023**	**Difference**	**Difference 2025 vs 2024**
Up to 30	449	285	249	36	164
31 to 50	466	224	252	-28	242
Over 50	**124**	**42**	**38**	**4**	**82**

Departures by professional category	**YEAR 2025**	**YEAR 2024**	**YEAR 2023**	**Difference**	**Difference 2025 vs 2024**
Executives and Managers	10	5	8	-3	5
Middle managers and qualified technicians	46	50	58	-8	-4
Administrative employees	**42**	**42**	**56**	**-14**	**0**
Operators	**941**	**454**	**417**	**37**	**487**
Total	**1039**	**551**	**539**	**12**	**488**

TWG's unwanted turnover rate considers dismissals and voluntary departures and stands at **25.78%** excluding investees. Reducing this rate will be a priority in 2026.

The Group uses defined thresholds to assess turnover risk. The current result is considered a concern and absolute departures increased considerably versus 2024 (60.98%), making turnover one of the main risks associated with rapid growth.

TW Group

Average contracts by gender, contract type and working time – comparison	YEAR 2025		YEAR 2024		YEAR 2023		YEAR 2022		Diferencia 2024 vs 2022		Difference 2025 vs 2024	
	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women
Fijos	942,00	594,00	952,00	500,00	793,41	295,89	778,26	302,39	173,74	204,11	-10,00	94,00
Temporales	67,00	72,00	34,00	41,00	51,57	24,05	67,86	22,10	-33,86	16,95	33,00	31,00
Paid internship/traineeship	0,00	0,00	2,00	0,00	2,31	0,21	0,00	0,00	2,00	-0,21	-2,00	0,00
Total	**1.009,00**	**666,00**	**988,00**	**541,00**	**847,29**	**320,14**	**846,12**	**324,49**	**141,88**	**220,86**	**21,00**	**125,00**
Part-time	90,00	262,00	35,00	116,00	15,07	22,37	10,14	23,30	24,86	93,63	55,00	146,00
Full-time	920,00	404,00	953,00	425,00	832,21	297,77	835,98	301,19	117,02	127,23	-33,00	-21,00
Total	**1.009,00**	**666,00**	**988,00**	**541,00**	**847,29**	**320,14**	**846,12**	**324,49**	**141,88**	**220,86**	**21,00**	**125,00**

Average contracts by professionalcategory, contract type and working time–comparison

	YEAR 2025				YEAR 2024				YEAR 2023				YEAR 2022			
	Directivos y Gerentes	Mandos intermedios y Técnicos cualificados	Administra- tive emplo- yees	Operators	Directivos y Gerentes	Mandos intermedios y Técnicos cualificados	Administra- tive emplo- yees	Operators	Directivos y Gerentes	Mandos intermedios y Técnicos cualificados	Administra- tive emplo- yees	Operator	Directivos y Gerentes	Mandos intermedios y Técnicos cualificados	Administra- tive emplo- yees	Operators
Fijos	66,00	204,00	183,00	1083,00	65,00	229,00	209,00	875,00	75,45	168,00	188,73	657,12	76,27	193,88	184,40	626,10
Temporales	0,00	4,00	10,00	124,00		2,00	3,00	146,00	0,00	1,15	4,59	69,88	0,00	0,56	3,55	85,83
Paid internship/ traineeship	0,00	0,00	0,00	0,00					1,00		0,51	1,00	0,00	0,00	0,00	0,00
Total	**66,00**	**208,00**	**193,00**	**1207,00**	**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	2,00	11,00	187,00	333,00	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	64,00	199,00	6,00	874,00	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	**66,00**	**210,00**	**193,00**	**1207,00**	**65,00**	**231,00**	**212,00**	**1021,00**	**76,45**	**169,15**	**193,83**	**728,00**	**76,27**	**194,46**	**187,95**	**711,93**

TW Group

Men represent 60% and women 40% of own employees. By professional category, 4% hold management positions, 12.53% are middle managers, 11.52% work in administration and 72.05% are operators.

The following tables show average own employees by gender, professional category and age range, excluding temporary-agency workers.

Average contracts by professional category, contract				**YEAR 2024**			**YEAR 2023**		
	Under 30	**30 to 50**	**Over 50**	**Under 30**	**30 to 50**	**Over 50**	**Under 30**	**30 to 50**	**Over 50**
Fijos	398,00	842,00	296,00	402,00	799,00	250,00	269,84	652,98	166,49
Temporales	55,00	61,00	23,00	34,00	35,00	8,00	31,37	35,75	8,49
Paid internship/traineeship	0,00	0,00	0,00	1,00	0,00	0,00	0,31	1,21	1,00
Total	**453,00**	**903,00**	**319,00**	**437,00**	**834,00**	**258,00**	**301,51**	**689,93**	**175,98**
Part-time	52,00	63,00	25,00	30,00	82,00	40,00	6,45	23,95	7,06
Full-time	401,00	840,00	294,00	407,00	752,00	218,00	295,07	665,99	168,92
Total	**453,00**	**903,00**	**319,00**	**437,00**	**834,00**	**258,00**	**301,51**	**689,93**	**175,98**

Average contracts by professional category, contract		**YEAR 2022**			**Diferencia 2024 vs 2022**			**Difference 2025 vs 2024**	
	Under 30	**30 to 50**	**Over 50**	**Under 30**	**30 to 50**	**Over 50**	**Under 30**	**30 to 50**	**Over 50**
Fijos	304,45	648,56	127,64	97,55	150,44	122,36	172,29	502,54	-122,36
Temporales	35,93	43,59	10,43	-1,93	-8,59	-2,43	33,30	44,34	2,43
Paid internship/traineeship	0,00	0,00	0,00	1,00	0,00	0,00	-0,69	1,21	0,00
Total	**340,38**	**692,15**	**138,07**	**96,62**	**141,85**	**119,93**	**204,89**	**548,08**	**-119,93**
Part-time	1,52	27,75	4,17	28,48	54,25	35,83	-22,03	-30,30	-35,83
Full-time	338,87	664,40	133,90	68,13	87,60	84,10	226,94	578,39	-84,10
Total	**340,39**	**692,15**	**138,07**	**96,61**	**141,85**	**119,93**	**204,90**	**548,08**	**-119,93**

The largest age group is **31–50**, representing **52% of the workforce**, as shown in the table below.

Employees aged **31–50** represent **52% of the workforce**, **31% are under 30** and **17% are over 50**. **The Group absenteeism rate is 5.74%**, an increase of 3.7% versus 2024.

Total worked hours
3.353.667
PY: 2.824.742
(+528.924 +19%)

Absenteeism
5,74
PY: 5,54%
(+3,7%)

Lost hours
192.503
PY:156.353
(+36.149 +23%)

Worked hours by men
2.184.925
PY: 1.936.531
(+13%)

Worked hours by women
1.168.742
PY: 888.212
(+32%)

Lost hours by men
104.624
PY: 93.418
(+12%)

Lost hours by women
87.878
PY: 62.936
(+40%)

S1-7

Characteristics of non-employee workers in the undertaking

In the logistics sector, operational demand varies significantly due to seasonality, activity peaks and specific client or project needs. To ensure service continuity and maintain operational efficiency, the Group makes planned, occasional use of temporary employment agencies (ETTs) as an organisational flexibility mechanism.
These needs are planned jointly by the Business and Human Resources teams in each country, based on prior analysis of workloads, commercial forecasts and permanent workforce sizing. The use of ETTs responds solely to operational criteria and does not replace permanent structural employment.
The Group currently has 46 approved ETTs across the countries where it operates. Local Human Resources teams are responsible for selecting and contracting these entities, working exclusively with recognised providers with proven experience, technical capability and knowledge of the labour regulations applicable in each jurisdiction.

As **ETTs are considered a supplier group with a higher potential level of social and human-rights risk** within our value chain, the Group strengthened its due-diligence mechanisms during the year, including:

- Mandatoryadherenceto the Supplier Code of Ethics (SCE).
- Specifictrainingon ethical principles and Group standards.
- Sustainability **and** regulatory compliance assessments.
- Review **of** labour practices and safeguards for workers' fundamental rights.

hese controls seek to ensure regulatory compliance, effective protection of labour rights, equal treatment, occupational health and safety, and the proper operational integration of these workers at our sites.
In line with CSRD and ESRS requirements, during 2026 the Group will strengthen the systematic analysis of potential and actual risks associated with the use of ETT workers considering:

- The geographical and regulatory context.
- The nature of the activity performed.
- Sector risk.
- Potential exposure to human-rights violations, particularly matters related to employee health and safety.

This process will involve the Legal department and will be integrated into the global risk- management and compliance system. The results of these assessments will be reported to the Compliance Committee (CCN), enabling corrective measures, adjustments to contracting policies and continuous improvement of oversight mechanisms.

This enables the Group to consolidate a responsible management model for non-employee workers, strengthening transparency and traceability in the supply chain and alignment with European sustainability and governance standards.

As shown, **46% of personnel in the Logistics unit are ETT workers**, while in**Automotive the percentage falls to 7.29%** of all ETT personnel,**97% are hired in the operator category.**

	Year 2025				Year 2024			
Division	**Country**	**ETT workers who are not employees**	**Own employees**	**% non-employee workers by country**	**Country**	**ETT workers who are not employees**	**Own employees**	**% non-employee workers by country**
TW Logistics & TWG participated companies	**Total**	**545**	**1181**	**46,15 %**	**Total**	**395**	**1248**	**24,04 %**
	Portugal	52	36	144,44 %	Portugal	55	42	56,70 %
	Spain	329	907	36,27 %	Spain	216	958	18,40 %
	France	124	163	76,07 %	France	105	165	38,89 %
	Sweden	16	62	25,81 %	Sweden	19	68	21,84 %
	USA	0	2	0,00 %	USA	0	2	0,00 %
	Australia	25 0	9 13	277,78 % 0,00 %				
	UK				UK	0	13	0,00 %
TW Automotive	**Total**	**35**	**494**	**7,09 %**	**Total**	**26**	**506**	**4,89 %**
	Mexico	0	362	0,00 %	Mexico	0	367	0,00 %
	USA	16	52	30,77 %	USA	10	57	14,93 %
	Germany	20	68	29,41 %	Germany	16	71	18,39 %
	Spain	0	12	0,00 %	Spain	0	11	0,00 %
Totals		**580**	**1675**	**34,63 %**		**421**	**1754**	**19,36%**

Group

Distribution by professional category and gender	YEAR 2025			YEAR 2024		
	Women	**Men**	**Total**	**Women**	**Men**	**Total**
Directors and Managers	-	-	-	-	-	-
Middle Managers and Qualified Technicians	1	4	5	-	2	2
Administrative staff	8	4	12	2	3	5
Operators	90	474	564	52	362	414
Total	**99**	**482**	**580**	**54**	**367**	**421**

Distributionbyjob category is shown in the table: male operators represent the largest group (81.72%).

The distribution by age range is shown in the following table.

Number of ETT workers by age	**YEAR 2024**	**YEAR 2025**
Up to 30 years	249	248
From 31 to 50 years	272	271
Over 50 years	60	59
Total	**580**	**578**

Training hours provided to ETT employees: because they represent a high share of our average workforce, particularly in Logistics, training these employees is key for the company.

Topic	**Training hours**
Code of Ethics	56
Culture	136
Environment	
Health and Safety	5.804
Onboarding	1.228
Quality	28
Technical	324
Total	7.576

S1-8 *Collective bargaining coverage and social dialogue*

The **87% of the Group workforce** is covered by **collective agreements**. In certain countries, such as **the United States, Germany, the United Kingdom and Australia**, applicable labour regulations and common labour-market practices mean that certain professional groups fall outside the scope of collective agreements.

	YEAR 2025				YEAR 2024			
Distribution by professional category and gender	**No. of employees covered**	**% covered**	**No. of employees not covered**	**% not covered**	**No. of employees covered**	**% covered**	**No. of employees not covered**	**% not covered**
Spain	907	100%%	0	0,0%	969	100,0%	0	0,0%
USA	0	0,0%	54	100,0%	0	0,0%	59	100,0%
Mexico	304	84,0%	58	16,0%	85	38,8%	282	61,2%
UK	0	0,0%	13	100,0%	0	0,0%	13	100,0%
France	163	100,0%	0	0,0%	165	99,9%	0	0,1%
Germany	0	0,0%	68	100,0%	0	0,0%	71	100,0%
Portugal	36	100,0%	0	0,0%	42	100,0%	0	0,0%
Sweden	62	100,0%	0	0,0%	67	98,6%	1	1,4%
Australia	0	0,0%	9	100,0%				
Total	**1472**	**87%**	**202**	**13%**	**1328**	**76%**	**426**	**24%**

In these cases, **working conditions are established through individual agreements**, including remuneration and other contractual terms. This helps strengthen the analysis of pay conditions and advance good employment practices.

Regarding **social dialogue and worker representation**, the Group has **works councils in companies with more than 50 employees**, made up of employee and company representatives. These representative bodies meet with a **variable** frequency, depending on the regulations and practices of each country.

TW Group

The Group currently has **eight works councils: two in Spain, four in France and two in Sweden**.

	YEAR 2025					YEAR 2024				
Country	**No. of emplo-yees**	**No. of works councils**	**Meeting frequency**	**Topics discussed**	**% employees represented by works councils**	**No. of emplo-yees**	**No. of works councils**	**Meeting frequency**	**Topics discussed**	**% employees represented by works councils**
Spain	907	2	SEMI-ANNUAL	Equality Plan, night-shift and productivity allowances, and Occupational Health and Safety	6%	158	2	Quarterly	Equality Plan, night-shift and productivity allowances, and Occupational Health and Safety	6%
France	163	4	3 monthly, 1 every two months	Occupational health and safety, bonuses, salaries	100%	173	3	Every two months	Occupational health and safety, bonuses, salaries	100%
Sweden	62	2	Every two months	HR and Occupational Health and Safety	100%	68	2	Every two months	HR and Occupational Health and Safety	100%
Total	1132	8				226	7			

At these meetings, matters relevant to employees are discussed, including **working conditions, the organisation of working time and the regularisation of overtime**, thereby maintaining a structured dialogue channel between the company and employees.

S1-9 *Diversity, Equality and Inclusion metrics*

At **TWG**, **diversity, equality and inclusion** are considered **key value-creation levers** and form an integral part of our corporate culture and people-management model. This commitment is reflected in the implementation of **processes and policies that guarantee equal opportunities**, promoting respectful, inclusive and merit-based workplaces. In this regard, our recruitment processes are designed to ensure **transparency and the selection of the most qualified people**, regardless of their personal, social or cultural circumstances.

Distribution by professional category and gender	YEAR 2025			
	Women	Men	Total	Difference 2025 vs. 2024
Directors and Managers	12	54	66	1
Middle Managers and Qualified Technicians	60	153	213	23
Administrative staff	115	90	205	3
Operators	577	1194	1771	-528
Total	**764**	**1491**	**2.255,00**	**-501**

In Spain, we currently have **three registered Equality Plans**, which establish concrete measures to promote equity in access to employment, career development, remuneration and work-life balance. In addition, the Group is currently **negotiating its LGBTI Plan**, further strengthening its commitment to inclusion and diversity in all their dimensions.

During 2025, TWG continued to build a more diverse workforce, particularly in gender terms, in a traditionally male-dominated sector. The workforce was **66% men and 34% women**.

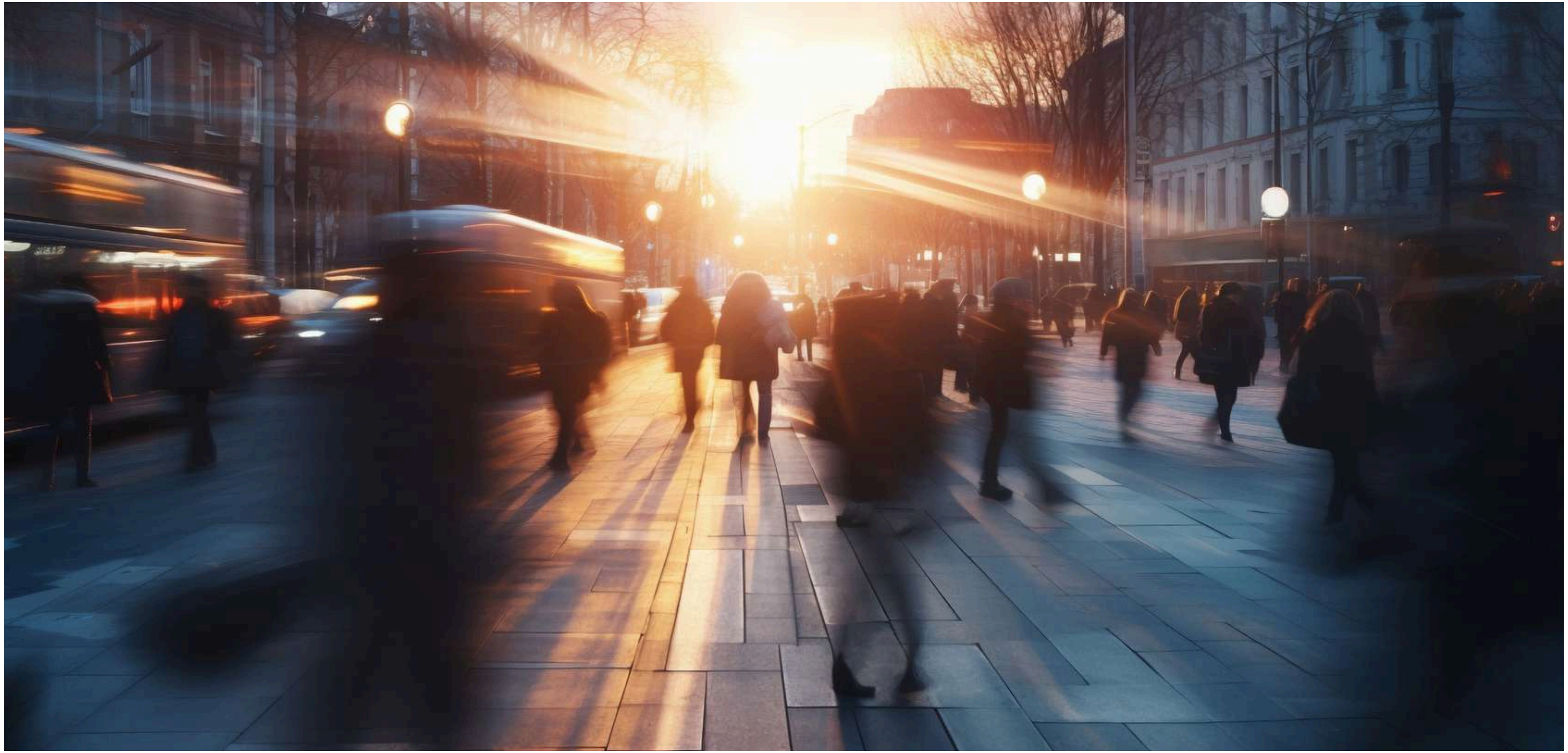
A significant improvement was also recorded in **female representation in positions of responsibility**, reaching **25.80%. Women in senior management:** 12; and in **middle management** positions with teams: 60.

As can also be seen in the table, **TWG** has 31% of employees under 30, **52% between 30 and 50, and** 17% over 50.

The percentage of employees with disabilities increased by 30% compared with 2024.

Our Code of Ethics and the complementary policies, such as the Inclusion, Diversity and Equal Opportunities Policy and the Harassment Protocol, reinforce the commitment

The percentage of employees with disabilities increased by 30% compared with 2024.



Our Code of Ethics and the complementary policies, such as the Inclusion, Diversity and Equal Opportunities Policy and the Harassment Protocol, reinforce the commitment
of **TWG** through internal HR procedures and the monitoring of performance KPIs aligned with the strategy, which are regularly reviewed by the Sustainability Committee (CSOS).

As a preview of the projects discussed in greater detail later in the Foundation section, we carry out important work to i**ncrease visibility and inclusion of people with intellectual disabilities in society and academia** through our INDOMABLES QUE CUENTAN project together with the Navarre social and labour inclusion centre Tasubinsa.

S1-10 y S16

Adequate wages and remuneration metrics

All our employees in European countries receive an adequate wage in accordance with Directive (EU) 2022/2041, and 100% of employees in non-European countries receive an adequate wage in accordance with the applicable national benchmarks.Average directors' remuneration, including variable remuneration, allowances, severance payments, contributions to long-term savings schemes and any other compensation broken down by gender, is included in the annual financial statements.
The following section analyses gross hourly pay **for the Group by category, gender and age range.**

Gender	Female				Male				Total
Age	<30 years	From 31 to 50 years	> 50 años	Total	<30 years	From 31 to 50 years	> 50 años	Total	
Category	€/hour	€/hour	€/hour	€/hour	€/hour	€/hour	€/hour	€/hour	€/hour
Administration	24,12 €	17,36 €	16,32 €	**19,63 €**	24,76 €	15,11 €	13,51 €	18,96 €	**19,36 €**
Management	14,54 €	24,64 €	9,39 €	**20,09 €**	0,00 €	41,93 €	36,93 €	39,28 €	**34,60 €**
Middle Manager / Technician	13,52 €	24,33 €	20,87 €	**20,67 €**	19,11 €	32,50 €	31,18 €	30,07 €	**27,13 €**
Operator	19,28 €	13,44 €	14,45 €	**15,08 €**	33,47 €	32,16 €	20,13 €	29,79 €	**26,33 €**
Total	**19,32 €**	**18,86 €**	**16,24 €**	**18,56 €**	**28,37 €**	**31,88 €**	**24,61 €**	**29,59 €**	**25,96 €**

The gender pay[13] gap by country is shown in the following table**.**

Gender pay gap by country	YEAR 2025	Aver age employees 2025	YEAR 2024
Spain	26,4	907	22,6
USA	12,84	54	41,02
Mexico	26,28	362	9,21
UK	22,89	13	36,39
France	38,36	163	-5,74
Germany	3,15	68	7,63
Portugal	-1,43	36	49,34
Australia	42,7	9	
Sweden	16,95	62	0,92
Total gender pay gap	**37,27%**	**1675**	**18,59**

The gender pay gap by category is shown in the following table.

Gender pay gap by category	YEAR 2025	YEAR 2024
Directors and Managers	48,86%	34,24%
Middle Managers and Qualified Technicians	31,27%	7,05%
Administrative staff	-3,53%	0,92%
Operators	49,37%	10,26%

The gender pay gap varies between countries due to structural factors **such as:**

- the distribution of men and women across different professional levels
- female representation in positions of responsibility
- and the characteristics of the labour market in each region.

The Group monitors the gender pay gap annually in all countries where it operates, with the aim of ensuring pay equity and promoting an organisational culture based on equal opportunities.

For 2025**, the** Group's overall gender pay gap stands at 32.27%

The high Group-wide pay gap is explained by the following factors: more men in countries with higher salaries, more women in lower-paying countries, more men in management positions and more women in administrative roles.The Group remains committed to policies that promoteequal opportunities, professional development and a balanced presence of women and men at all organisational levels.

13 (Average gross hourly remuneration of male employees – average gross hourly remuneration of female employees) / average gross hourly remuneration of male employees) × 100[2]is

Group

The following table shows **the remuneration ratios by country.**[14]

Country	YEAR 2025	YEAR 2024
Spain	5,53	2,77
USA	3,49	3,75
Mexico	9,75	1,80
UK	3,39	3,72
France	3,47	2,32
Germany	2,31	2,49
Portugal	2,93	2,81
Sweden	2,25	1,32
Australia	4,44	

14 $$\frac{\textit{Annual total remuneration for the undertaking's highest paid individual}}{\textit{Median employee annual total remuneration (excluding the highest} - \textit{paid individual)}}$$

S1-11

Social protection

TWG ensures that 100% of its employees are covered by the public social-protection systems in force in the countries where it operates, in accordance with the regulations applicable in each jurisdiction.

These systems provide coverage against loss of income arising from contingencies such as illness or temporary incapacity, occupational accidents and diseases, unemployment, parental and family leave, retirement and other statutory contributory benefits.

The Group strictly complies with its obligations regarding registration, social-security contributions and payments, ensuring the proper registration and protection of all workers under the relevant regulatory framework.

The Group currently has no corporate supplementary social-protection systems—such as private collective medical insurance or additional pension plans—beyond the mandatory mechanisms established by national legislation in each country of operation. This reflects a compensation model aligned with the local legal framework, financial sustainability and internal equity.

Nevertheless, we periodically assess the adequacy and competitiveness of our employee value proposition, considering regulatory developments, labour-market conditions and social expectations, as part of our commitment to responsible and sustainable working conditions.

S1-12

Persons with disabilitie

TWG promotes inclusion, equity and diversity through its Inclusion,Diversity and Equality(IDI) Policy, integrated into people management and recruitment processes. The percentage of employees with disabilities increased by 30%, as noted in the previous section.

Employees with disabilities
13
PY:10(+3 +34%)
(+528.924 +19%)

Employees with disabilities <30 years
2
PY:3 (-0 -9%)

Employees with disabilities (TW & ETT)
0,58%
PY: 0,50% (+0% +16%)

Employees with disabilities, 31–50 years
10
PY: 5(+5+105%)

Men with disabilities
8
PY: 6 (+1 +23%)

Women with disabilities
5
PY:3 (+2 +56%)

Employees with disabilities >50 years
1
PY: 2(-1 -57%)

The HR department continues to identify suitable profiles and collaborate with ETTs to make structured progress in this area.
In adidition, **the company ensures accessibility at its facilities through measures such as ramps, stairlifts and adapted toilets, providing safe and inclusive workplaces** for people with reduced mobility.

S1-13

Training and skills development

TWG is delivered through internal workshops, online learning and external courses, and we consider it essential for developing our talent and retaining employees. We continue to invest in our own e-learning platform and are adapting our new HR and Occupational Health and Safety management programme so that internal training can be delivered within the platform itself.

Total training hours by professional category	YEAR 2025	Difference 2025 vs. 2024	YEAR 2024	YEAR 2023
Directors and Managers	1.900,00		2.984	3.634
Middle Managers and Qualified Technicians	4.023,00		3.918	3.687
Administrative staff	2.183,75		6.080	5.351
Operators	13.490,93		15.088	9.594
Total	**21.598,40**		**28.070**	**22.266**
ETT	**7.577,32**		**-**	
TOTAL OWN STAFF + ETT	**29.208,70**	**4%**	**28.070**	**167.896 €**

Training is tailored to each role and to our company objective**. Both HR and the managers of each area determine these needs** annually and verify the effectiveness of each training activity against those objectives. HR also records all training activities on the Sustainability platform.

A total of 29,208 training hours were delivered, equivalent to **an average of 1 2.95 training hours per person** (own staff and ETT) with an investment of €119,098.55. The areas receiving **the greatest training effort are occupational health and safety (35%) and technical aspects of the job (43%),** as shown in the table below. In 2025 we delivered**1 0,147.47 hours of specific Health and Safety training, equivalent to an average of 4.49 hours per person, prioritised** according to role criticality and linked to Driving Wellness Together to reinforce ergonomics, safe equipment handling and emergency response.

	YEAR 2025			YEAR 2024		
Distribution by professional category and gender	**Training hours**	**Investment in euros**	**% of total hours**	**Training hours**	**Investment in euros**	**% of total hours**
Quality	1.554,95	9.780,86 €	5%	1.386	18.386,66 €	5%
Cybersecurity	66,50	0,00 €	0%	347	0,00 €	1%
Compliance (Code of Ethics)	249,75	1.500,00 €	1%	207	2.554,54 €	1%
Culture	200,25	3.994,75 €	1%	55	1.820,97 €	0%
Environment	702,50	1.478,80 €	2%	670	3.622,72 €	2%
Health and Safety	10.147,47	11.643,95 €	35%	4555	18.505,99 €	16%
Languages	1.967,50	26.771,98 €	7%	4057	54.358,53 €	14%
Onboarding	1.707,75	964,48 €	6%	401		1%
Technical	12.612,33	62.963,73 €	43%	16394	52.851,09 €	58%
	29.209,00	119.098,55 €	100%	28.070	152.100,50 €	100%

As part of the Group Strategic Training Plan, during 2026 training activities will strengthen employee knowledge and awareness of key strategic matters for the Group's activities. A three-year strategic training plan and a specific plan for 2026 will be implemented.The main planned training areas are as follows: Cybersecurity and information security.

Training in good information-security practices for all employees.

Awareness campaigns on threats such as phishing and social engineering through periodic simulations.

Specific training in information-security risk management and business continuity for technical profiles.

Periodic distribution of information bulletins on security alerts and good practices.

Occupational health and safety

Types of training delivered in 2025:

Mandatory occupational-risk-prevention training adapted to each role.

- Mandatory occupational-risk-prevention training adapted to each role.
- Specific training for the safe use of work equipment (forklifts, pallet trucks and work at height).
- Training for emergency teams and first aid.
- Basic occupational-risk-prevention management training for middle managers and site managers.

Human rights and working conditions

Training on the Group Code of Ethics and principles of responsible professional conduct.

Training on human rights, equality and working conditions.

Training on anti-corruption, conflicts of interest and regulatory compliance for departments dealing with third parties.

Sustainability

Corporate training for all employees on the Group sustainability strategy and its main lines of action. These training activities will be delivered in different formats, including structured courses on the digital platform, sessions with ex

ternal providers, awareness campaigns and assessments of acquired knowledge.The comparison of training hours by professional category is shown in detail below.

72% of training hours are directed at operators.

Total training hours by professional category	YEAR 2025	Difference 2025 vs. 2024	YEAR 2024
Directors and Managers	1.900,00		2.984
Middle Managers and Qualified Technicians	4.023,00		3.918
Administrative staff	2.183,75		6.080
Operators	13.490,93		15.088
Total	**21.598,40**		**28.070**
ETT	**7.577,32**		**-**
TOTAL OWN STAFF + ETT	**29.208,70**	**4%**	**28.070**

As mentioned in earlier sections of the report, as part of TWG's ongoing focus on skills development, **TWG** has launched the TW OES (Operational Excellence System) initiative, which combines good HR practices and operational efficiency. It is our system for operating with precision, efficiency and adaptability, in line with the **purpose of excellence** that drives this organisation. Based on four drivers— efficiency, performance and achievement control, standardisation and continuous improvement —the system has proved innovative. The results are promising, with a holistic approach involving HR, occupational health and safety, communication, quality and business,with approval and oversight by the Board of Directors (BoD).

Within the OES (Operational Excellence System) project, the Group considers **employee training and development** to be key elements in improving operational efficiency and service quality at our sites. Implementing OES involves introducing **new ways of organising work, standardising processes and promoting continuous improvement**, which requires training teams and strengthening their operational skills (updated job descriptions and work instructions, one-to-one performance conversations, OES Academy).

For this reason, the Group promotes **training activities for both site managers and operational teams,** aimed at improving operational organisation, incident resolution and the identification of process- improvement opportunities.This approach makes it possible to i**ncrease operational efficiency, reinforce workplace safety and support employees' professional development,** actively involving them in the organisation's continuous improvement. It is also important to highlight that **ETT personnel also received extensive training during 2025** as shown in the table below, accounting for 25.94% of total training at **TWG**. As ETT personnel are essential for covering the demand peaks typical of our activity, promoting their training is a strategic decision. Training allows them to adapt quickly and become more versatile in their roles, increasing satisfaction and reducing turnover. It also facilitates their transition to the permanent workforce, enabling them to take on long-term responsibilities and helping to reduce costs.

Table of training received by ETT employees.

Topic	Training hours
Code of Ethics	56
Culture	136
Environment	
Health and Safety	5.804
Onboarding	1.228
Quality	28
Technical	324
Total	**7.576**

S1-14

Health and safety of our workforce[15]

Providing a safe and healthy workplace is a priority for TWG and a relevant matter for our Stakeholders, as set out in our Integrated Environment, Quality and Occupational Health and Safety Policy. The management system is certified toISO 45001:2018 **and implemented across our operations, ensuring consistent prevention and continuous-improvement criteria.**The Health and Safety managers of TWL and TWA, together with HR, ensure risk training from onboarding, record information on the internal platform and periodically report indicators to the Sustainability Directorate and Sustainability Committee, updating improvement initiatives.
In Spain and Portugal we use external prevention services (SPAs) that assess the risks of each position and propose improvement measures. In other countries, specialist companies support the assessment of role-specific risks and improvement measures where SPAs do not exist.

During 2025, the traceability and monitoring of occupational-accident data were improved by separating indicators by region—Spain, European Union (excluding Spain), outside the EU and global—and by separately reporting ETT accident data. This allows more detailed analysis and more effective preventive management, although direct comparison with previous years is more difficult because of the methodo logical change and the progressive transition from Mutua Universal to Fraternidad.

In addition, in 2025 the Group's consolidated indicator included for the first time accidents recorded

in the participated companies. This expanded consolidation scope provides a more complete and consistent view of accidents across TWG. In 2025, one occupational disease was recorded at the Survilliers site (France) and managed

in accordance with internal procedures.

	SPAIN		EU (excluding Spain)		NON-EU		TOTAL TW	
	SPAIN Women	SPAIN Men	EU (excluding Spain) Women	EU (excluding Spain) Men	NON-EU Women	NON-EU Men	TOTAL TW Women	TOTAL TW Men
Lost-time occupational accidents	19	17	4	6	2	7	25	30
Non-lost-time occupational accidents	8	12	0	18	12	33	20	64
Accident severity rate	0,73	0,83	0,07	0,16	0,00	0,00	0,50	0,42
Accident frequency rate	23,67	20,49	22,68	14,37	9,11	12,31	20,85	16,52

Accidents and Rates (IF/IG) for the company's own workforce.

15 Methodology for calculating the indicators: Frequency Rate (FR) = (Number of accidents resulting in lost time * 1 million) / (Hours worked during the selected period * Average number of workers) – Severity Rate (SR) = (Days of lost time * 1,000) / (Hours worked during the selected period * Average number of workers)

In 2025, the following ETT worker accidents were recorded by scope:

	SPAIN		EU (excluding Spain)		NON-EU		TOTAL TW	
	SPAIN Women	SPAIN Men	EU (excluding Spain) Women	EU (excluding Spain) Men	NON-EU Women	NON-EU Men	TOTAL TW Women	TOTAL TW Men
Lost-time occupational accidents	5	16	2	8	0	1	7	25
Non-lost-time occupational accidents	0	4	1	9	0	0	1	13
Accident frequency rate	39,68	34,32	58,48	23,15	0,00	17,92	39,28	28,82

Accidents and rates (FR/SR) for external workforce.

For comparisons, accident data from participated companies were excluded to preserve methodological consistency with previous years:

	2025		2024	
	Women	Men	Women	Men
Lost-time occupational accidents	8	28	9	35
Non-lost-time occupational accidents	20	62	21	51
Accident severity rate	0,03	0,69	0,50	1,49
Accident frequency rate	7,61	22,71	38,46	45,53

Comparison of accidents 2025 vs. 2024 – own workforce.

In 2025, accident performance for the own workforce shows a **favourable trend** compared with 2024. Lost-time accidents fell by 18.2%, with decreases for both women and men. Non-lost-time accidents increased overall, mainly among men. Normalised indicators reinforce the improvement: the frequency rate decreased significantly and the severity rate alsofell, showing lower relative accident incidence and severity.

	2025		2024	
	Women	Men	Women	Men
Lost-time occupational accidents	7	25	12	7
Non-lost-time occupational accidents	1	13	3	11
Accident frequency rate	39,28	28,82	123,46	10,60

Comparison of accidents 2025 vs. 2024 – external workforce.

In 2025, external-workforce accident data show an uneven trend compared with 2024, with **significant differences by gender**. Lost-time accidents increased overall, mainly because of the increase among men, while they decreased among women. Non-lost-time accidents remained broadly stable overall, with a reduction among women and an increase among men. In terms of relative incidence, the frequency rate decreased among women but increased among men. These results reinforce the importance of strengthening the coordination of business activities, preventive requirements for contractors and supervision of working conditions in areas with greater exposure.

In 2025, **1,603 health examinations** were carried out across the Group, compared with 973 in 2024 (+53.13% year on year).

S1-15

Work-life balance

Organisation of working time

The organisation of working time at TWG **adapts to the operational nature of its activities**, particularly in logistics and industry, where **a high degree of flexibility is required to ensure service continuity**.

The Group therefore structures working time through different shift systems (morning, afternoon and night), according to the needs of each operational site and client and in full compliance with labour regulations in each country.

Shift planning is managed locally, ensuring:

- compliance with statutory rest periods
- balanced worker rotation
- appropriate coverage of operational activity

Regarding **overtime, it is managed in a controlled manner** and in accordance with applicable legislation, and is used only when production needs require it.

Where possible, the Group promotes flexible working models, especially in administrative and management positions, helping employees balancepersonal and professional life.

In line with its commitment to employee well-being, the Group continues to introduce initiatives aimed at improving work organisation, shift predictability and employee satisfaction.

During 2025, the Group **prepared and approved its Digital Disconnection Policy, which was published on the TW Connect internal platform** and communicated through internal Human Resources procedures and local managers.

The organisation also continues to promote respect for rest time through automatic email messages and by including the policy in the Welcome Manual and Equality Plans.Currently at TWG, 44 employees in the categories of Directors and Managers, Middle Managers and Qualified Technicians, and Administrative staff have **flexible working hours** and 42 employees **work remotely**. This measure was introduced to improve employees' work-life balance, allowing them to manage their responsibilities more effectively and increase job satisfaction.
The following tables provide information on employees who benefit from **flexible hours and remote working.**

Gender	Female		Male		Total	
Category	Total	% of Total	Total	% of Total	Total	% of Total
Administration	11	0,246183206	5	0,106870229	15	0,353053435
Management	4	0,083969466	1 5	0,333969466	18	0,417938931
Middle Manager / Technician	4	0,097328244	5	0,118320611	9	0,215648855
Operator			1	0,013358779	1	0,013358779
Total	**19**	**0,427480916**	**25**	**0,572519084**	**44**	**1**

Gender	Female		Male		Total	
Category	Total	% of Total	Total	% of Total	Total	% of Total
Administration	8	0,186	5	0,13	13	0,316
Management	4	0,096	11	0,264	15	0,36
Middle Manager / Technician	5	0,11	6	0,148	11	0,258
Operator			3	0,066	3	0,066
Total	**16**	**0,392**	**25**	**0,608**	**42**	**1**

The following table includes employees who have taken **family-related** leave by country:

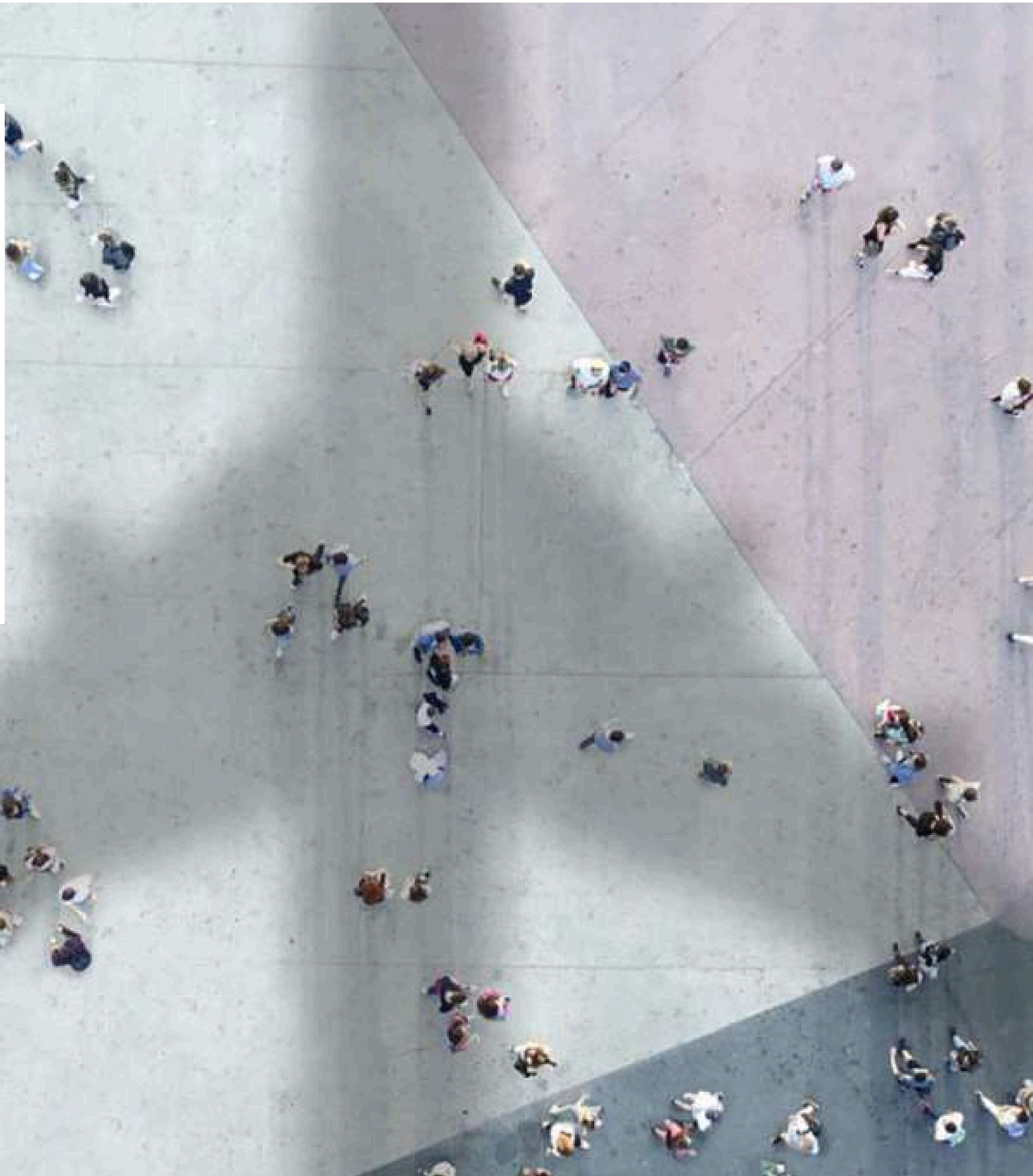
Gender	Female		Male		Total	
Country	Total	% of Total	Total	% of Total	Total	% of Total
Spain	3	19,11 %	8	59,24 %	10	78,34 %
Mexico	1	4,46 %	0	3,18 %	1	7,64 %
Sweden	1	7,64 %	0	0,00 %	1	7,64 %
France	0	0,00 %	1	5,73 %	1	5,73 %
United States	0	0,00 %	0	0,64 %	0	0,64 %
Germany	0	0,00 %	0	0,00 %	0	0,00 %
Australia	0	0,00 %	0	0,00 %	0	0,00 %
Portugal	0	0,00 %	0	0,00 %	0	0,00 %
United Kingdom	0	0,00 %	0	0,00 %	0	0,00 %
Total	**4**	**32,21 %**	**9**	**68,79 %**	**13**	100,00 %

S1-17

Incidents, complaints and serious human-rights matters

During 2025, no incidents of discrimination related to work were reported to the HR department or through the ethics communication channel. Specifically, no cases were reported on grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation or other relevant forms of discrimination, whether involving employees or other external stakeholders in the operations included in the reporting period. This also includes harassment incidents, understood as a specific form of discrimination.

Likewise, during 2025 no cases of human-rights violations such as forced labour, human trafficking or child labour were identified. To provide greater clarity on the interpretation and scope of indicator **ESRS S1-17,** the following **specific reference notes are provided.**



ESRS DR	DATA POINT / METRIC	ACCOUNTING POLICY
S1-6	Total number of employees	Employee data are recognised based on the Group HR system records. Data represent the position at year-end (31 Dec 2024).
S1-6	Number and rate of employee turnover	Employees leaving TWG during the year include voluntary departures and dismissals, broken down by gender and age range. Employee turnover is calculated as the number of employees leaving during the reporting year divided by total or average employees.
S1-6	Full-time employee	A full-time employee is an employee whose weekly/monthly/annual working hours meet the national definition of full-time work.
S1-6	Part-time employee	A part-time employee works fewer hours per week, month or year than the full-time definition above.
S1-6	Number of new hires	Number of new employees joining the workforce during 2024.
S1-6	Turnover	Number of employees promoted to a higher category during 2024.
S1-8	Collective bargaining coverage	Employees covered by collective agreements divided by total employees € 100.
S1-8	Social dialogue	Employees working at locations with worker representatives divided by total employees € 100.
S1-9	Women in decision-making positions	Share of women in decision-making positions, defined as women on the Board of Directors, Directors and Managers, and Middle Managers and Qualified Technicians.
S1-9	Age distribution	Calculations include all employees (full-time and part-time) and are based on the workforce.
S1-16	Gender pay gap	The gender pay gap is calculated as average gross pay for male employees minus average gross pay for female employees, divided by average gross pay for male employees.
S1-11	Social protection	Social protection refers to measures providing access to healthcare and income support in difficult life events such as job loss, illness and medical needs, childbirth and childcare, or retirement and pension needs.
S1-13	Average training hours per employee	Total training hours offered and completed divided by the total number of TWG employees, calculated on a workforce basis.
S1-13	Number of employees participating in training and number of courses completed	Extracted from the TWG database and HR information collection.
S1-14	Accident frequency rate	Calculated as (number of lost-time accidents € 1 million) / hours worked (total absence hours / total hours worked) € 100.
S1-14	Accident severity rate	Calculated as (calendar days lost due to accidents, from the first day of absence / hours worked) € 1,000 / absenteeism rate.
S1-14	Absenteeism rate	Calculated as (total absence hours / total hours worked) € 100.
S1-15	Family-related leave	Family-related leave includes maternity, paternity, parental and caregiver leave available under TWG policies, national laws and/or collective agreements.
S1-16	Annual remuneration ratio	Calculated as annual total remuneration of the highest-paid individual divided by annual total remuneration of the median employee, excluding the highest-paid individual.
S1-17	Number of complaints	Total number of complaints submitted through TWG's ethics communication channel. This mechanism is available to all stakeholders.

Specific notes on ESRS S1

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 conducts its activities with the support of business partners and suppliers throughout its value chain, particularly subcontracted road-haulage companies responsible for managing and transporting goods. As a result, certain operational activities are performed by workers employed by these partners, mainly drivers.

TWG's materiality assessment identified the health and safety risks faced by workers in the value chain as a material impact, particularly those related to driving and operating vehicles in road freight transport.
These workers may be exposed to operational risks associated with traffic, load handling and other conditions inherent to logistics activities. Health and safety incidents may have negative consequences for workers as well as for operational continuity and the organisation's reputation.

To this end, hauliers receive two manuals: the "**Drive with us**" welcome manual and the driver manual, which includes occupational health and safety measures and training, together with good driving practices.

During the reporting period, TWG carried out an analysis and strengthening process for its supplier-management system with the aimofmoving towards more structured and efficient management of risks associated withitsvalue chain. In this context, the company developed tools and procedures to improve theidentification, assessment and monitoring of environmental, social, legal and governancerisksassociated with its business partners.

As a result of this process, **TWG has defined a comprehensive supplier-risk matrix** and designed a structured **supplier-assessment system**, which will classify business partners according to their level of risk and performance in relevant areas, including sustainability, regulatory compliance and occupational risk prevention. This tool is being progressively integrated into purchasing and supplier-management processes.

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

S2-1

↘ Policies related to workers in the value chain

TWG sets out its responsible-business expectations through its **Supplier Code of Ethics (SCE**) which defines the principles and standards business partners must respect regarding labour rights, occupational health and safety and compliance with applicable legislation.

The Supplier Code of Ethics requires suppliers to prioritise workers' health and safety, provide safe working environments and adopt appropriate measures to prevent accidents, injuries and occupational diseases. Suppliers must also comply with labour and occupational risk-prevention legislation in the countries where they operate.

Additional information on the content, oversight and implementation of the Supplier Code of Ethics is provided in section G1-1.

S2-2

↘ Processes for engaging with workers in the value chain

Currently, **TWG** has no direct engagement mechanisms with workers employed by its suppliers. However, these workers may report potential irregularities or concerns regarding compliance with the principles of the Supplier Code of Ethics through **TWG's ethics communication channel**, which is accessible to all stakeholders.

During the reporting period, one complaint concerning workers in the value chain was received through this channel.

S2-3

↘ Processes to remediate negative impacts and channels for raising concerns

TWG's ethics communication channel enables all stakeholders, including workers in the value chain, to report potential irregularities involving breaches of ethical, labour or safety principles.

Communications received are managed in accordance with the company's internal investigation and follow-up procedures, described in section **G1-1.**

S2-4

↘ Actions regarding material impacts on workers in the value chain

TWG integrates sustainability, regulatory compliance and risk-management criteria into its supplier selection, assessment and monitoring processes, with the aim of preventing and mitigating potential negative impacts on workers in its value chain.

To this end, the organisation has developed a comprehensive supplier-risk matrix, which assesses business partners across several risk dimensions relevant to the Group's activities, including:

- environmental, social and governance (ESG) risks
- data-protection risks
- legal and regulatory risks
- cybersecurity risks

Based on this initial assessment, suppliers are classified by criticality, enabling control, supervision and monitoring actions to be prioritised.

Depending on the level of risk identified, **TWG** may request various forms of documentary evidence of compliance from suppliers, including:

contracts containing ESG, legal and data-protection clauses; civil-liability insurance; technical and occupational risk-prevention accreditations; quality, environmental or sustainability certifications; evidence of safety and compliance training; information-security certifications or controls; and signed declarations of responsibility.

In addition, **TWG** has designed a structured supplier-assessment procedure that periodically reviews business-partner performance across areas relevant to the organisation. The assessment includes:

- product or service quality
- on-time performance
- technical capability
- incident management
- environmental impact of the activity
- environmental certifications human-
- rights compliance
- sustainable logistics
- occupational risk-prevention compliance
- safety and accident performance
- contractual and legal compliance
- financial stability
- communication and operational support

The results of these assessments enable suppliers to be classified according to performance and improvement actions to be established where deviations from the standards defined by **TWG** are identified.

For transport services specifically, TWG complements these measures by providing a Driver Manual to transport contractors. It sets out operational and safety guidelines to prevent accidents and promote safe driving practices, including instructions on:

- compliance with integrated environmental, occupational health and safety, and quality policies
- safety and risk-prevention guidelines
- requirements for proper vehicle condition
- actions in the event of accidents or incidents
- rules for the safe transport of goods and loading/unloading methods
- hazard identification and preventive measures
- defensive driving and accident prevention

Through these measures, **TWG** seeks to strengthen responsible supply-chain management and minimise risks affecting workers involved in its logistics operations.

Progress made during 2025

During 2025, **TWG advanced the development and implementation of a more structured supplier-management system** to strengthen due diligence in its value chain. The company developed a comprehensive supplier-risk matrix and a supplier-assessment procedure to improve the identification, evaluation and monitoring of risks associated with its business partners.

During the period, the company also began developing an awareness and training plan for suppliers on the principles of the Supplier Code of Ethics, to strengthen understanding and application of TWG's responsible-conduct standards throughout its supply chain.

A total of **48 suppliers were classified as critical**. All received the **sustainability assessment**, but only 20 responded, achieving an **average score of 62/100.**

A total of 101 suppliers were selected to receive **SCE training** (Supplier Code of Ethics); 49 completed it.

Assessment results allow **suppliers to be classified according to risk level and performance**, with **follow-up and improvement actions** defined where deviations or areas for improvement are identified.

These developments form part of the **progressive strengthening of the Group's supplier-management system** to improve management of social risks in the value chain, particularly those related to the safety of professionals involved in logistics operations.

S2-5

Targets related to the management of material negative impacts

TWG will continue to develop and progressively implement its supplier-assessment and monitoring system to strengthen management of social risks in the supply chain.

Based on the **supplier-assessment results, the Sustainability Committee (CSOS) will review** business-partner performance periodically and define targets **and improvement actions aimedats trengthening safety and compliance across the value chain.**

AFFECTED COMMUNITIES

ESRS 2 – SBM-3

During 2025, **TWG** consolidated its commitment to communities through its "**Creating Positive Impact**" approach, evolving towards a more structured, close and sustainable model of action.

This approach goes beyond one-off interventions to focus on **creating long-term social value in the communities where the company operates, through:**

- direct involvement in local communities
- active collaboration with social organisations
- support for economic-development initiatives
- mobilisation of the company's own capabilities

"Creating Positive Impact" thus becomes a strategic pillar guiding decision-making and reinforcing the integration of sustainability into the business.

S3-1

Policies related to affected communities

TWG has a solid framework supporting its commitment to communities:

- Corporate Social Responsibility (CSR) Policy
- Code of Ethics
- Human Rights Policy
- Inclusion, Diversity and Equality Policy

These policies ensure that all actions are aligned with:

- respect for people
- contribution to sustainable development
- ethical and responsible conduct

This framework enables TWG to progress consistently towards its goal of creating real and sustainable positive impact.

S3-2

Processes for engaging with affected communities about impacts

During 2025, TWG developed various initiatives aimed at **creatingpositiveimpact in its communities**, through a model based on proximity, collaboration and action.

These initiatives are characterised by:

- identification of genuine local needs
- collaboration with local organisations and NGOs
- active employee participation in community events
- contribution of logistics and operational capabilities

The main lines of action have focused on local social initiatives supporting community wellbeing and contributing to projects in areas including social welfare, health and environmental protection.

The following images show examples of initiatives carried out during 2025 in the different countries where we operate**.**

Reforestation work in Mexico carried out with employee volunteers.

Collaboration with Banco de Tapitas in Mexico: a solidarity initiative that collects plastic bottle caps to support children with cancer.

Collaboration in local cancer-awareness campaigns and the charity gala organised by Clínica Universidad de Navarra**.**

Vaccination campaigns.

Visit by TECNUN engineering students to our Pilsting plant (Germany).

Popular races and the Corporate Challenge: TWG promotes a culture focused on sport and healthy lifestyles, contributing to the physical and mental wellbeing of its teams.

- **Talks by our CEO, Carlos Llonis, at universities.** The Group CEO is actively involved in academia through collaboration with several universities, where he gives talks to students. In these sessions, he shares his experience of internationalisation processes and managing multinational companies, offering a practical view of the global business environment.

This initiative helps bring the professional world closer to future graduates, encouraging talent development and understanding of the challenges and opportunities of working in international contexts.

As part of our commitment to society, we promote sustainable development in our community through **collaboration with social organisations** such as Fundación Osasuna CF, the Children Against Cancer Gala initiative and the Association of Foundations of Navarre. We also participate actively in **business and sector associations** including the Navarre Chamber of Commerce, the Navarre Automotive Cluster, the Navarre Marketing Club, AECOC, ADEGI, FVET and AVIA, among others, where we share knowledge, experience and innovation and strengthen a global view of the challenges and risks of our activity.

In addition, **our CEO**, Carlos Llonis, participates as a **mentor** in the Senior Mentoring Programme at the **Public University of Navarre**. We also maintain close collaboration with the university through its master's programme.

TW FOUNDATION

The TW Foundation is one of the main vehicles through which the Group channels its commitment to society, contributing actively to the development of the communities where it operates.

Its work is structured around strategic lines aimed at creating positive and sustainable social impact, with a particular focus on:

- Promoting culture by supporting initiatives that facilitate access to knowledge and skills development.
- Supporting social inclusion and equal opportunities, helping to create fairer and more cohesive environments.
- Collaboration with social and community organisations, contributing to local development and social wellbeing.
- Support for the creation of the collaborative sustainability platform Espacio 30.

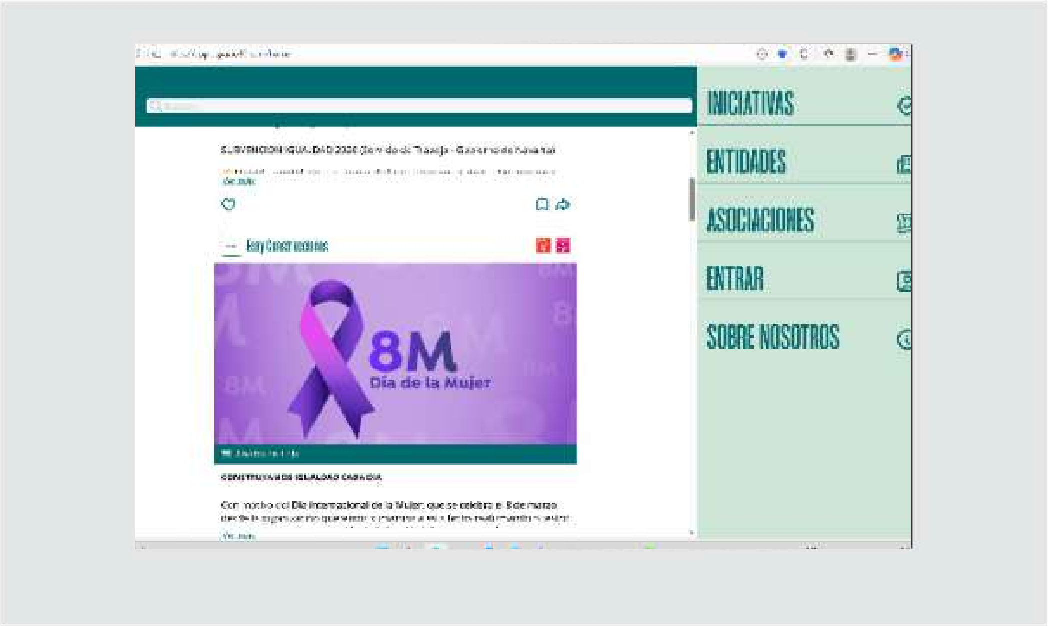
Through these lines of action, the Foundation seeks to create shared value, aligning its activities with the Group's values and today's main social challenges.

TWG also encourages employee involvement in social initiatives, fostering a culture of commitment and active participation that strengthens the link between the organisation and its surroundings.

The Foundation's activity is progressively integrated into the Group's sustainability strategy, contributing to its social objectives and strengthening its position as a responsible company.

Main activities carried out during 2025:

- **Espacio 30**[16]: An initiative involving companies and corporate foundations that seeks to promote the strategic and cultural transformation of sustainability in organisations by showcasing and exemplifying good practices and encouraging partnerships. It is a reference platform for sustainability management and provides practical examples for SMEs. TWG participates actively by communicating its initiatives; the platform has more than 30 participating organisations. The TW Foundation is a founding partner alongside three other Navarre-based companies.



16 https://app.espacio30.com/

- **Publishing:** "**INDOMABLES**" collection: stories for children and adults based on experiences and moments from the lives of notable figures from Navarre throughout history. The aim is to foster critical thinking and universal values such as respect, loyalty, freedom through knowledge, courage, honour and honesty. The collection focuses on inspiring people who had the curiosity to look deeper, the ingenuity to discover extraordinary things in everyday life and the courage to promote critical thinking. **Jerónimo de Ayanz** (our first title): poet, musician, cosmographer and inventor who patented and used a steam engine 100 years before the Industrial Revolution. The collection has been declared of social interest by the Government of Navarre's Department of Culture.

- **Receipt** of the Juan de Palafox award: one of the TW Foundation's first major projects was the publication of "Juan de Palafox[17] Talent, Passion and Commitment", a work paying tribute to an essential historical figure connecting two cultures that are important to TWG: Navarre and Puebla de los Ángeles in Mexico. The book received Third Prize for Best-Edited Books 2023 in the Bibliophilia category, awarded by Spain's Ministry of Culture.

The award recognises the aesthetic and artisanal quality of the edition, especially its parchment binding, produced by the Cistercian nuns of the Royal Monastery of Santa Lucía in Zaragoza. The jury highlighted details such as the deckled edges, handmade headbands and hand-painted spine. The Foundation makes the book available for anyone interested to download and enjoy free of charge.

17 https://tw-group.com/construyendo-futuro-a-traves-del-conocimiento-y-la-cultura-fundacion-tw/

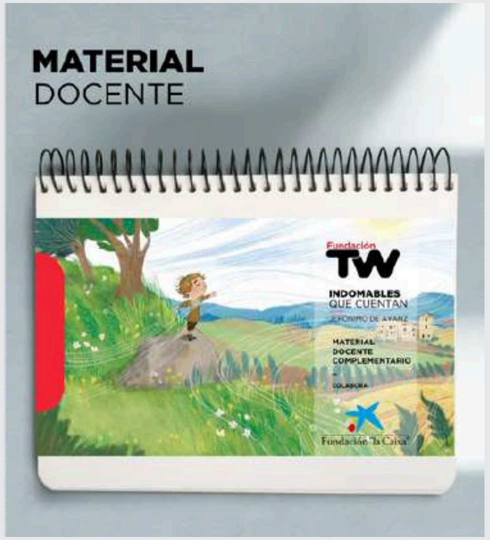
- **Collaboration with Fundación La Caixa and the Indomables Collection.**

With support from CREENA, the TW Foundation identified 30 schools in Navarre that actively work on inclusion.

Thanks to a **€7,000 donation from Fundación La Caixa**, each school received free of charge a pack containing four Spanish copies and one English copy of our first story about Jerónimo de Ayanz.

Each copy includes a QR code with educational activities, interesting facts and teaching resources for educators.

The Fundación "La Caixa" brand appears on all elements of the mailing: envelope, letter and books. Our commitment is to send packs of the subsequent stories in the collection from 2026 to 2029, with one new story launched each year.



- **Project INDOMABLES QUE CUENTAN with TASUBINSA.**

Its aim is to raise the visibility of people with intellectual disabilities through an inclusive educational initiative. **Together, we bring the characters from the Indomables collection into classrooms through adapted, creative and participatory experiences**, fostering empathy, diversity and shared learning from an early age.

- **Sponsorship and presentation of the book Images of Our Lady of Guadalupe in Navarre: Promotion and Identity from Mexico.**

On 12 December, coinciding with the feast of Our Lady of Guadalupe, the book Images of Our Lady of Guadalupe in Navarre: Promotion and Identity from Mexico, by Professor **Ricardo Fernández Gracia**, was presented at the Recoletas church in Pamplona. The book was published by the University of Navarre through its Chair of Navarre Heritage and Art, and sponsored
by the TW Foundation as part of its commitment to research, culture, knowledge and rigour.

- **Battle of the Organs of Fitero**

In August, the TW Foundation collaborated in the organisation and sponsorship of the "Battle of the Organs and a Tenor" event at the Monastery of Fitero, a concert held in honour of Don Juan de Palafox.

- **The Splendour of Spanish America**

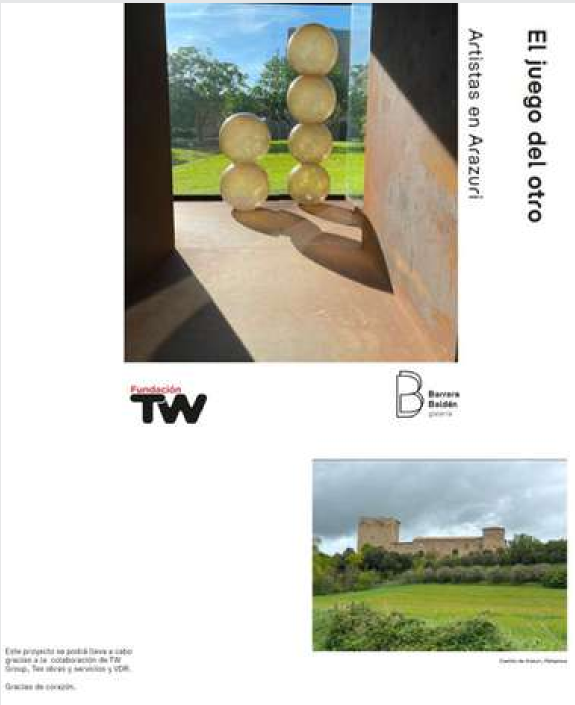
We also supported the promotion and dissemination of the book The Splendour of Spanish America, written by José Manuel Azcona Pastor. At the presentation at the Navarre Chamber of Commerce, our Foundation Chairman, Miguel Sanz, took part in the panel.

- **Tree of Dreams**

Our first collaboration with CaixaBank Social Action on the Tree of Dreams project. A wonderful initiative that helps bring happiness to vulnerable people. Through the participation of Group employees, we were able to provide gifts and fulfil the wishes of children and elderly people in vulnerable situations.

- **Painting** exhibition **at the Palace of Arazuri.**

The Foundation sponsored an art initiative organised with the Barrera Baldan gallery at the Palace of Arazuri. Over six days, eight painters came together to work. The final pieces were exhibited at the Palace of Arazuri. Among the participating artists was Secundino Hernández, whose works have been sold by international auction houses including Phillips, Sotheby's and Christie's.



The following table shows TWG's private social investment (PSI)[18] contributions by TWG during 2025:

PSI - TWG social investment	Amount (€)
Donaciones a ONGs/Entidades	8.160
Association membership contributions	25.506
Total investment in TW Foundation	117.285
Total	150.951

TWG maintains a strong commitment to the community, aligned with the promotion of culture, education and health as strategic pillars of sustainable development.

18 PSI: Private Social Investment

CUSTOMERS AND END USERS

ESRS 2 – SBM-3

TWG considers its **customers strategic partners** for mutual success, continuously working to understand their needs and develop efficient, tailored and sustainable solutions. Customers are also considered a material topic in our double-materiality assessment.

Impact generated:

- Supply-chain optimisation
- Reduction of operating costs
- Improved service punctuality and reliability

Value levers:

- Customer proximity and knowledge
- Service orientation
- Sector experience and know-how
- Commitment to safety and quality
- Innovation focused on continuous improvement

Scope of impact:
The value created extends to our operations, our customers and their stakeholders, withshort-, medium- andlong-term impact.

Responsible information management:
TWG ensures the confidentiality, integrity and availability of customer information as the basisfortrust and regulatory compliance.

S4

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

At **TWG**, we work collaboratively with our customers to maximise the positive impact of our operations on people and the environment, contributing to safer, more efficient and more sustainable supply chains.

This impact is generated both in our own activities and throughout the value chain, reaching our customers and their stakeholders in the short, medium and long term. The Group's value creation rests essentially on two pillars: **safety and quality.**

Safety is embedded across all operations through the application of the highest standards and continuous process control, helping minimise risks and ensure reliable working and service environments.

In this regard, the Pamplona logistics centre holds internationally recognised certifications including:

- ISO 22000, for food safety.
- IFS Logistics (International Featured Standards), a globally recognised standard that guarantees quality and safety in food-product logistics.

These standards require continuous monitoring and ongoing process improvement, reflecting TWG's firm commitment to safety, quality and operational excellence throughout its activities.

In addition, **TWG** holds a **set of international certifications in** quality, environmental, safety and management areas, reinforcing the strength of its operating model and its ability to respond to risks and external requirements. These include ISO 9001 (quality management), ISO 14001 (environmental management) and ISO 45001 (occupational health and safety), implemented across various Group sites and activities.

These certifications enable **TWG to ensure continuous improvement** of its processes, minimise environmental impacts, protect people's safety and ensure service excellence, directly contributing to sustainable value creation for customers and other stakeholders.

These certified management systems are also a key tool for the **identification, prevention and mitigation of operational, environmental and social risks.**

In line with this continuous-improvement approach, the Group is currently **implementing ISO 27001,** to strengthen information-security and cybersecurity systems, increasingly important in a highly digitalised environment and in the management of complex logistics and industrial operations.

Our **QUALITY** is a distinctive feature, driven by **INNOVATION**, creating value for our customers. **All five TWA plants**, together with automotive component assembly at the **TWL Vitoria plant** are certified to **IATF 16949**.

At TWA, our customers issue monthly reports through their own systems and share them with us. During 2025, we maintained an **A rating with all customers**, once again demonstrating that we are one of their most valuable and reliable suppliers, with a high level of performance. Five customer complaints were received in 2025 and were resolved effectively and to the customers' satisfaction.

Safety

Activity	IT System	Benefits
TWA	MES (Manufacturing Execution System)	**1. Real-time monitoring:** Enables rapid detectionofand response toany plant safety issue, minimising risks and downtime.
		2. Traceability: Tracks every step of the production process, helping rapidly identify and correct failures or safety incidents.
		3. Quality control: By integrating quality management into the production process, we ensure that defects are detected and corrected early, reducing the risk of defective products that could cause safety issues
		4. Process automation: Reduces manual intervention and therefore the risk of human error compromising safety.

Our initiatives reflect a comprehensive approach to continuously improving our processes.

Each initiative is designed to optimise specific processes by reducing time, improving traceability and increasing operational reliability, while improving efficiency and reducing the use of human and technological resources, **optimising performance** and memory utilisation. A common objective is to ensure **scalability** and **business growth**, enabling solutions 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, enabling ongoing use and smooth, efficient implementation.

At **TWA** the implementation of SAP S/4HANA in materials management, production and warehousing remains under way, supporting business continuity through process integration, improving operational visibility and strengthening logistics efficiency.

The **Lincs sequencing system** is also being implemented in parallel, providing full traceability and robustness in JIS shipping processes and responding quickly to new customer requirements.

In addition, the **roll-out of the new MES** improves the ergonomics and continuity of production processes.

Key milestones in 2025:

- Lincs system implemented at the Pilsting plant (Germany) – 03/2025
- MES system implemented at the San Luis Potosí plant (Mexico) – 08/2025.
- During 2025, preparations were also made for the SAP roll-out in Germany and carpet sequencing for MBUSI in Alabama.

At **TWL**, we take a comprehensive approach to modernising and continuously improving our operational processes. All solutions integrate with existing management systems, facilitating implementation and ongoing use, and leverage advanced technologies such as drones, artificial intelligence, predictive systems and data-analytics platforms. Each innovation is designed to optimise specific processes, including inventory management, replenishment, operational productivity, transport documentation and delivery routes. The common objective is to increase efficiency, reduce the use of human and machinery resources, minimise operating costs, improve information traceability, reduce human error and reduce CO_2 emissions.

- Drone Inventory: drones are used to count full pallets at height, integrating information with the Warehouse Management System in real time.
- Warehouse Replenishment Optimisation System: a predictive system based on consumption analysis by SKU and product family. It recommends optimal locations and replenishment needs using parameters such as ABC consumption, expiry dates, stock level, proximity to docks and picking intensity.
- Warehouse Productivity Dashboards: advanced dashboards in Qlik Cloud analyse operator productivity and cross-reference all PDA scan items, improving warehouse operating efficiency.
- eCMR implementation in the Transport Management System: digitises documentation and improves traceability. This reduces errors, increases signature-process efficiency, saves time and cost, and optimises shipment documentation.
- Artificial Intelligence tools in the Microsoft 365 ecosystem: advanced AI capabilities improve efficiency and effectiveness in the workplace.
- AMR project for a major food-sector customer.
- The implementation of the new TMS in TWL's Full Load business has improved route planning and optimisation, reduced empty kilometres and enabled better use of synergies between operations. This increases efficiency and delivers a tangible improvement in our carbon footprint, while reinforcing our commitment to more sustainable operations.
- Implementation of an automatic emissions-calculation system in TWL operations.

Currently, **TWL** holds ISO 9001 certification in 25 warehouses. As part of our commitment to customer satisfaction, TWL invites customers to complete an annual survey via the following link:

https://forms.office.com/Pages/AnalysisPage.aspx?

AnalyzerToken=COpxgXggO2HOIuBuP
DkU9CmcH4etjk4N&id=Hj-fYfrdNkyt3lA8IldF8Uz2URkOjFtCl9Rcs4-voRVUMVcwUzZCS0p
LMzhEQzROU0k4RVg5NU9XRC4u

In 2025, customers who responded gave an average rating of 3.96/5. We will continue to promote the survey in 2026 using the same questionnaire design, allowing us to assess whether actions taken to improve satisfaction are effective for each surveyed customer.

For customer complaints, each TWL KAM (Project Manager) verifies that complaints have been resolved, and a general weekly review meeting is held to report their status. Evaluating more customers will help identify areas for improvement and strengthen our practices, which is essential for customer loyalty and retention. By extending the assessment to a greater share of turnover, we can ensure that our quality practices meet the expectations of a broader customer base.

In summary, this commitment reinforces our dedication to quality and positions us to better meet customer needs and expectations, supporting sustainable growth and higher customer satisfaction.

Customer Data Protection

At **TWG**, risk management for **information security and data protection** is critical to business sustainability and customer trust. Our activities involve sensitive information, making the **confidentiality, integrity and availability of data** essential both for regulatory compliance and for protecting the rights of customers and stakeholders.

Our technology systems and solutions process relevant logistics and industrial information, creating growing exposure to **cybersecurity** risks such as unauthorised access, data leaks or technology incidents. If materialised, these risks could have significant **financial, regulatory and reputational consequences**, affecting relationships with existing and potential customers.

This risk arises mainly from our own operations and is managed through a structured approach based on **prevention, control and continuous improvement**. Key measures include ongoing employee training in **cybersecurity and appropriate information handling**, strengthening the first line of defence against potential threats.

In 2025, the Group approved a new **Data Protection Policy**, consolidating its governance model in this area. The framework is supported by the ongoing work of the **Data Protection Committee**, coordinated with the Data Protection Officer (DPO), ensuring proper implementation, oversight and evolution of internal practices.

In line with this commitment and to strengthen customer confidence and operational resilience, **TWG** is in the process of implementing **ISO 27001 within the Logistics division**. This certification will strengthen our information-security management system by providing a structured framework for **identifying, assessing and mitigating technology risks**, and ensuring data protection in an increasingly digital environment.

As part of this commitment, all five Automotive plants are certified to TISAX, the automotive-sector information-security standard.

The adoption of these standards responds not only to increasing regulatory and market requirements but also to the Group's commitment to **ensuring the highest level of security ininformation processing, providing reassurance and confidence to customers and the organisation itself**

S4-2 and S4-3

↘ Processes to remediate negative impacts and channels for customers to raise concerns

Customers and their stakeholders are encouraged to raise concerns about potential irregularities through our ethics communication channel. Business teams hold regular meetings with customers to facilitate direct, open communication, receive continuous feedback and strengthen relationships, taking their views and concerns into account. Further information is available in section G-1. As part of this, the DPO maintains a risk register including a mitigation plan. During 2025 we promoted **customer quality surveys** to understand satisfaction levels, perceptions of our services and the overall customer experience. The information obtained is a key lever for continuous improvement, decision-making and stronger long-term relationships.

S4-1

Policies related to customers

TWG's relationships with **TWG** stakeholders are founded on **principles of integrity, transparency and ethical conduct**, as described in section **G1-1**. In this context, personal-data protection is a key element of responsible business management and the safeguarding of fundamental rights.

TWG has a **Data Protection Policy**, approved by the Board of Directors, whose purpose is to protect the rights and freedoms of all individuals who interact with the Group. The policy safeguards the right to privacy and personal-data protection and establishes the internal procedures required to comply with applicable legislation in each jurisdiction.

The management model is based on the principles of Regulation (EU) 2016/679, including data accuracy, retention limits, security of processing and accountability.

To ensure correct application, TWG has an **external Data Protection Officer (DPO)** in Spain, who performs the functions established under European legislation and oversees compliance with data-protection principles and obligations.

The policy also requires **an up-to-date record of processing activities** and periodic **risk assessments**, to determine and implement measures ensuring appropriate and secure processing of personal data.

Internationally, compliance with local legislation is ensured through cooperation between TWG Legal and **local legal advisers in each country**, enabling the data-protection model to be adapted to each jurisdiction's regulatory requirements.

S4-4

Actions relating to material incidents affecting customers

TWG has a framework designed to ensure **appropriate management of customers' personal data, in compliance with Regulation (EU) 2016/679 (GDPR)** and applicable Spanish legislation, as well as the laws in force in the countries where it operates.

In Spain, the Group Vice-President has been designated as **Head of the Internal Information System**, strengthening the company's commitment to governance, oversight and compliance in data protection.

The company has an approved Data Protection Policy and the support of a Data Protection Officer (DPO), who advises on and oversees regulatory compliance. Personal-data management is based on accountability, minimisation, security and confidentiality, promoting coordination between Legal, IT and operational teams.

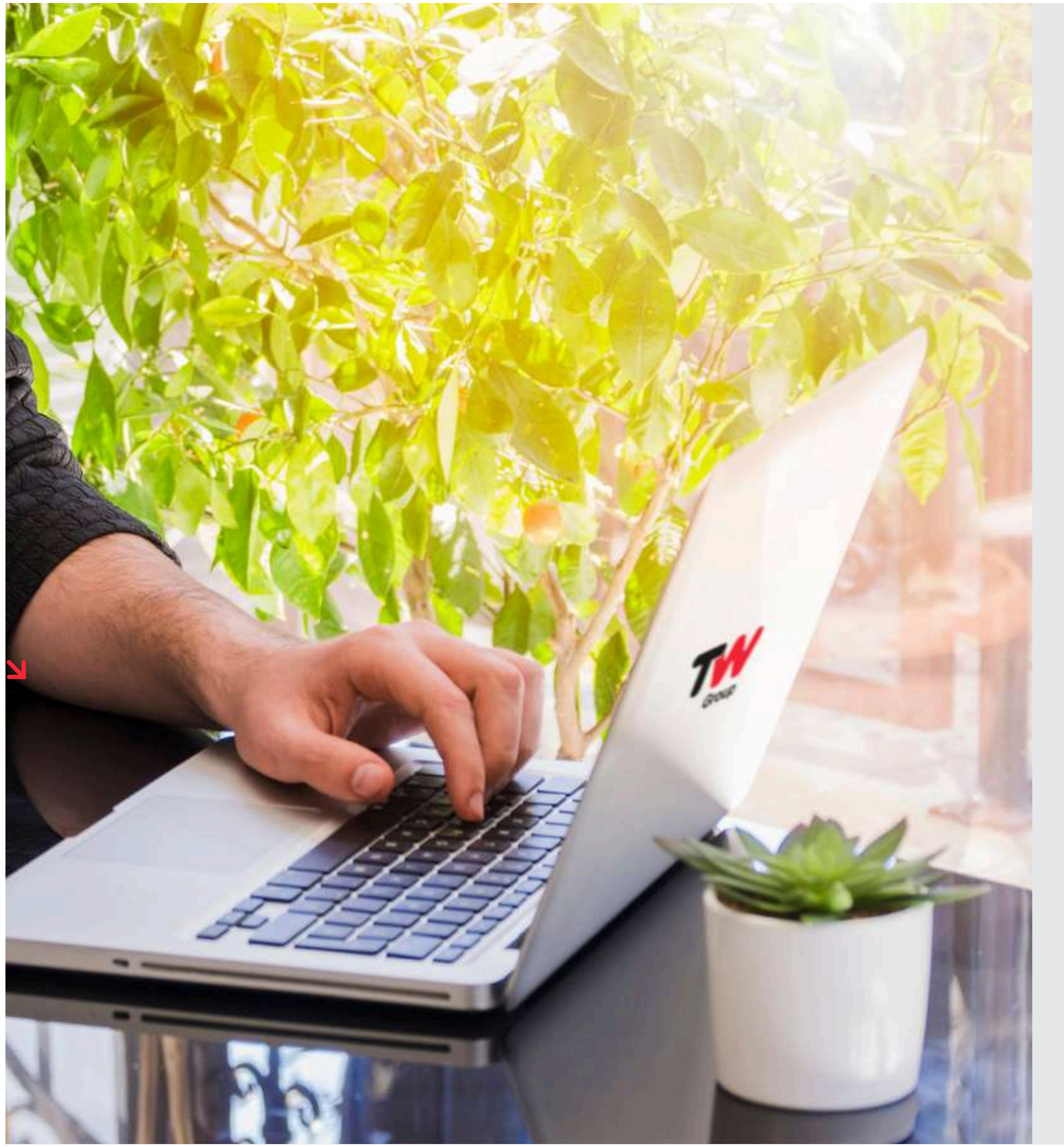
In addition, **TWG adapts its policies and processes to the legislation applicable in each jurisdiction where it operates**. During 2025, the company adapted its procedures to Mexican data-protection requirements, strengthening systems and practices to ensure legal compliance in this area.

S4-5

Targets related to the management of material negative incidents

In 2026, we will continue improving our risk-management approach and will define objectives to strengthen business resilience.

The Regulatory Compliance Committee (RCC) will review internal procedures and the risk matrix, together with the corresponding impact assessments and the Record of Processing Activities provided by the DPO, and will report to the Board of Directors for oversight.



Business Conduct ESRS G1

11

Corporate

11. Business Conduct ESRS G1 ESRS 2 SBM-3

5
New Corporate Policies

1
Report received through the ethics communication channel

250
hours of Code of Ethics training

Group criminal-risk matrix

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

At **TWG**, we are committed to conducting our business in accordance with the highest standards of integrity, business ethics and regulatory compliance, respecting the laws and regulations applicable in every country in which we operate, as set out in our Code of Ethics.

As a logistics company, we are subject to a broad international regulatory framework that varies according to the country and the type of goods transported. This framework includes requirements relating to safety, documentation, transport and customs procedures; non-compliance could result in financial penalties, legal liabilities and reputational damage.

In addition, our activities are exposed to potential risks of bribery, corruption and anti-competitive practices arising from the complexity of the value chain, which involves multiple suppliers and contractors, as well as operations in international environments and competitive tendering processes. These risks may materialise in the short, medium or long term, particularly in markets identified through international indices.

To mitigate these risks, **TWG** continuously strengthens its compliance programme,

promoting a common framework that defines how relationships with third parties must be managed and ensuring ethical principles are embedded throughout the organisation. The **Board of Directors** (BoD) is the **body ultimately responsible** for overseeing the Group's corporate culture, business conduct and compliance system. Its members have extensive professional experience and receive ongoing training aligned with the strategy and business challenges.

During **2025,** the Board strengthened its capabilities through **specific training on cybersecurity and criminal-law risks, improving oversight of emerging risks.**

- For its part, the Regulatory Compliance Committee (RCC) acts as the body driving a culture of integrity throughout the Group. Its main responsibilities include:Drafting and updating corporate policies.
- Promoting procedures for their proper implementation.
- Overseeing compliance with the Code of Ethics.
- Managing the ethics communication channel, including the receipt and assessment of reports

The RCC is chaired by the VP & CHRO and includes the Legal Director, the Environmental Manager and the TWA Controller (Secretary). It reports periodically to the Board of Directors on its activities and progress.

Where annual compliance objectives are not met, the Board of Directors identifies and defines corrective actions and areas for improvement to ensure they are achieved.

TWG is currently developing its **Group criminal-risk matrix** in collaboration with **Deloitte**, as part of its commitment to strengthening the compliance system. At year-end, the analysis was almost complete, with only two jurisdictions (the United States and Australia) still pending assessment.

Preliminarily, the main criminal-law risks identified are concentrated in:

- Environmental ofences
- Violations of people's rights
- Corruption-related offences

This exercise will strengthen the Group's prevention, detection and response mechanisms, consolidating a compliance model aligned with international best practice.Management of impacts, risks and opportunities

G1-1

Business conduct policies and corporate culture

TWG's compliance framework is **TWG** anchored in its corporate values, the Code of Ethics (CE), together with our specific policies.

Both the CE, SCE, Anti-Corruption Policy, Information Security Policy and Data Protection Policy are available on our website.[19]

19 https://tw-group.com/etica-y-transparencia/

They are also published on the TW Connect corporate intranet.

The CE, Human Rights Policy, Inclusion, Diversity & Equal Opportunities Policy, Integrated Policy, CSR Policy and Anti-Corruption Policy are translated into all languages of the countries in which we operate and published on TW Connect.

The SCE, Anti-Corruption Policy, Sustainable Purchasing Policy and Information Security Policy are translated into English. The Conflict-of-Interest Policy and Data Protection Policy are currently available only in Spanish and are also published on TW Connect.

The policies approved this year are also published on our corporate intranet: Conflict-of-Interest Policy, Digital Disconnection Policy, Gifts and Invitations Policy, Sustainable Travel Policy and Data Protection Policy.Code of Ethics and culture of integrity

TWG's Code of Ethics reflects the Group's **corporate values** and establishes **a clear framework of principles and standards** guiding conduct throughout all operations. It defines expected behaviours, including respect for human rights, and sets out the Group's commitments in key areas such as diversity, equal opportunities, fair competition and the prevention of bribery and corruption.

The Code of Ethics also incorporates **principles of business integrity and regulatory compliance**, as well as the company's social responsibilities regarding environmental protection and the socioeconomic development of the communities where it operates.

During 2026, TWG will **update the Code of Ethics, the Human Rights Policy and the Supplier Code of Ethics**, to reflect the Group's evolution and new external challenges. This process reinforces the organisation's commitment to the principles underpinning its conduct and further aligns it with sustainability and governance best practice.

In addition, the Group will promote specific training and awareness initiatives for employees and suppliers to ensure these principles are properly understood, applied and integrated into day-to-day operations.

The Regulatory Compliance Committee (RCC) is responsible for **ensuring compliance with the Code of Ethics**, promoting the necessary internal procedures and ensuring appropriate communication throughout the organisation. Its responsibilities include:

- Overseeing compliance with the Code of Ethics.
- Managing the ethics communication channel.
- Investigating communications received.
- Reporting periodically to the Board of Directors.

The RCC is composed entirely of women (100%) and meets monthly to oversee implementation of its initiatives. It also prepares an annual report covering the activities carried out and the matters monitored.

During 2025 all members of the **RCC receivedspecifictrainingontheUNE-ISO31000 standard** for risk management, delivered by AENOR.

TWG ensures that all employees receive **specific training in ethics and compliance.** Human Resources is responsible for training new employees, who receive information on the Code of Ethics as part of onboarding, together with content on corporate culture, cybersecurity, data protection and occupational risk prevention.

In addition, the Group intends to establish mandatory annual refresher training for all employees through its e-learning platform, using specific training content that includes a comprehension assessment whose results are recorded.

This approach ensures that ethics and compliance training is not limited to onboarding but remains up to date and aligned with evolving risks and the regulatory environment.

The Code of Ethics of TWG[20] reflects its **values and establishes a set of ethical rules** for the company covering all aspects of its operations. It includes guidelines for appropriate conduct, such as respect for human rights, and details the company's commitments to diversity, fair competition

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

and anti-bribery and anti-corruption measures.

It also addresses business integrity, including regulatory compliance, and the company's social responsibilities regarding environmental protection and socioeconomic development.

Ethics Communication Channel

TWG makes available to all stakeholders an **ethics communication channel accessible through its corporate website**, enabling any conduct that may breach the Code of Ethics, applicable legislation or the organisation's principles to be reported confidentially and, where appropriate, anonymously.

This channel is a key tool for **promoting a culture of transparency, integrity and accountability**, facilitating early detection of potential irregularities and supporting their proper management.

The system guarantees the **confidentiality of information**, protection of whistleblowers against retaliation and diligent handling of all communications received. It also ensures compliance with applicable data-protection and internal reporting-system legislation.

Communications are managed by the **Regulatory Compliance Committee**, which is responsible for analysis, investigation and follow-up and reports periodically to the Board of Directors on the channel's operation and results.

Through this channel, TWG reinforces its commitment to ethical and responsible management, encouraging active participation by employees, suppliers, customers and other stakeholders in preventing misconduct.[21] Through our website.

All communications are reviewed and assessed by the Regulatory Compliance Committee (RCC), which determines whether the concern falls within scope whenever the following breaches of our Code of Ethics (CE) are suspected or observed. Whistleblowers are protected against any retaliation or discriminatory or disciplinary action resulting from submitting a report.

During 2025, one anonymous report was received, investigated and successfully closed by the RCC.SUPPLIER RELATIONS

G1-2 and G1-6

↘ Management of supplier relationships, payment terms and supply-chain due diligence

The success of **TWG**'s business model is based on strong relationships with suppliers that share the company's ethical principles. Our expectations for suppliers are set out in the Supplier Code of Ethics for Suppliers (SCE), which is published on our website[22] and provided to each supplier at the start of the business relationship.

This code addresses potential risks related to labour practices,

21 https://tw-group.com/canal-de-comunicacion-etica/

22 https://tw-group.com/etica-y-transparencia/

human rights, health and safety, the environment, bribery and corruption in the supply chain. Suppliers must comply with international human-rights standards and national laws relating to child and forced labour, working hours, wages and benefits, and non-discrimination.

- In line with our commitment to sustainable development, we promote local purchasing. TWG's total purchasing volume in TWG2025, as shown in the following table by business unit, amounted to €243,239,712.47 (€226.486m in 2024)Total **local purchasing (<200 km)**: €62,688,083.57 **(26%)**
- Total **national purchasing:** €77,849,260.12 **(32%)**
- Total **international purchasing:** €103,231,049.30 **(42%)**

TWG made progress during 2025 in consolidating a **structured supplier-management model**, designed to ensure responsible business practices aligned with environmental, social and governance (ESG) criteria **throughout the supply chain.**

This model is based on a risk-based **due-diligence approach** that identifies, assesses and manages potential impacts associated with suppliers, focusing particularly on those considered critical because of operational relevance or ESG-risk exposure.

As a first step, the Group developed a **supplier-risk matrix**, which has enabled the supply chain to be segmented and prioritised according to criteria such as service criticality, contracting volume, geographical location and type of activity

ORIGIN

No. of suppliers <200 km	No. of national suppliers	No. of international suppliers
1.708	**4.456**	**1.335**
PY: 1.74 mil	PY:4.52 mil	PY: 1,51mil
(-1,56%)	(-1,44%)	(- 11,35%)

% Purchases <200 km	% National purchases	% International purchases
18%	**11,6%**	**20,4%**
PY: 21%	PY: 35%	PY: 19%
(-15,56%)	(-66,86%)	(+8,75%)

Purchase volume € TWA	Purchase volume € TWL
20.226.088	**585.585**
PY: 13.000.000	PY: 597.000
(+53%)	(-2%)

Purchase volume € TWL	Purchase volume € Setland
221.889.359	**528.681**
PY: 213.000.000	PY: 94.000
(+4%)	(+460%)

Based on this analysis, **48 critical suppliers** were identified across strategic categories including temporary employment agencies (TEAs), transport, information and communications technology (IT), raw materials and professional services, among others.

To tailor the assessment to each supplier type, the Group **defined 10 supplier categories,** developing for each:

- A specific qualification form
- A risk-assessment questionnaire
- A sustainability-assessment questionnaire

This approach enables a more accurate and relevant assessment of the risks associated with each supplier type.

During the year, a **first sustainability-assessment campaign** was carried out covering all identified critical suppliers.

- Suppliers assessed: 48
- Response rate: 42% (20 suppliers)
- Overall average score: 62.11%

The results show differing levels of sustainability maturity across supplier categories:

- Temporary employment agencies (TEAs): 76.75%
- Supplies: 95.5%
- IT and communications: 61%
- Raw materials: 53.38%
- Professional services: 41%
- Transport: 31.5%

These results have made it possible to identify priority areas for improvement, particularly in those categories with the highest exposure to risk, such as transportation and certain professional services.

The Group has a **Supplier Code of Ethics (SCE**) setting out the minimum principles and standards required in ethics, human rights, working conditions, regulatory compliance and environmental sustainability.

During the year:

- **100% of new suppliers adhered to the SCE**
- **Training on these principles was promoted,** reaching 49 suppliers out of 101 selected

This commitment strengthens the integration of ESG criteria into commercial relationships with third parties and establishes a common basis for responsible conduct.

The Group complements the overall approach with **supplier-type-specific management**:

- **IT suppliers:** formalised responsible declarations covering compliance and security
- **Temporary employment agencies (TEAs):** management and supervision by Human Resources, with particular attention to labour and social matters
- **Transport suppliers:** monitoring and control by the Fleet Department, given their strategic relevance and operational impact

This approach enables closer supervision adapted to the specific risks of each category.

The Group will continue to advance the **maturity of its supply-chain due-diligence system** during 2026, focusing on:

- Increasing supplier participation in assessment processes
- Deepening ESG-risk analysis in critical categories
- Developing specific action plans for suppliers with medium or low performance levels
- Implementing digital tools to automate assessment, monitoring and information traceability
- Progressively integrating supplier management into corporate systems

This process forms part of the Group's commitment to responsible, transparent and sustainable value- chain management, aligned with European regulatory requirements and international best practice.

We expect suppliers to prioritise occupational health and safety and environmental compliance, and to support TWG's Scope 3 emissions-reduction objective. This includes providing GHG-emissions data and setting emission-reduction targets for their operations aligned with the objectives and trajectory of the Paris Agreement.

During 2025, one communication was received through our channels concerning potential non-compliance in human-rights management, labour practices or environmental matters involving one of our suppliers.

The standard payment term is 87 days for large suppliers and 74 days for the remainder. TWG has no pending legal proceedings relating to late payments. Payment terms are supported by our ERP systems.ANTI-CORRUPTION AND ANTI-BRIBERY

G1-3

Prevention and detection of corruption and bribery

At **TWG** we adopt a **zero-tolerance approach to bribery, corruption and any fraudulent conduct**, committing to act with integrity, ethics and transparency in all operations and relationships worldwide. The Group complies with applicable legislation in every jurisdiction where it operates and expressly prohibits facilitation payments.

Within the preliminary analysis of the criminal-risk matrix, **TWG identified corruption in business as one of the relevant risks**, due to the nature of its activities and continuous interaction with third parties. This risk includes potential bribery, offering or accepting improper advantages and unmanaged conflicts of interest

This commitment is articulated through the Code of Ethics and Anti-Corruption Policy

which establish the principles and conduct requirements applicable to all employees and are supported by mandatory training. For suppliers, these standards are conveyed through the Supplier Code of Ethics, reinforcing a culture of integrity throughout the value chain.

The Group's international operations may involve specific risks such as duplicate invoicing, fraud or money laundering. Without adequate controls, these risks could result in financial penalties, litigation and loss of customer trust. To mitigate them, **TWG has robust control systems**. In TW Automotive, the ERP system (SAP) verifies consistency between production and invoicing and requires multiple validations before invoices are issued. Supplier invoices are also subject to additional validation processes, significantly reducing the risk of irregularities.

All payments and receipts are made exclusively through electronic means, eliminating cash and strengthening financial traceability.

TWG has a Transfer Pricing Policy that ensures intragroup transactions comply with the arm's-length principle and establishes a clear, consistent and auditable pricing framework. This helps prevent tax risks, avoid penalties and strengthen transparency.

The Group **does not operate with banks in tax havens and does not maintain commercial relationships with public administrations or state-owned companies beyond those necessary** for regulatory compliance; such relationships are managed through formal channels under Legal Department supervision.

Given that the Group operates in a competitive environment, there is a potential risk of anti-competitive practices. To mitigate this, TWG ensures that **all contracts are awarded through transparent competitive processes**, generally managed through customers' digital platforms.

In addition, **non-disclosure agreements (NDAs)** are formalised to ensure appropriate handling of information and prevent misuse of sensitive data.

Where irregular conduct or potential corruption offences are suspected, the Regulatory Compliance Committee (RCC) acts independently of the governing body, ensuring objective investigation and appropriate follow-up of each case.

The Group complements its control system with **trainingand awarenessinitiatives,** designed to prevent, detect and manage fraud and corruption risks. During the year:

- 38 managers with greater exposure to risk (management, purchasing and administration) received specific training on the Anti-Corruption Policy.
- 60 managers received training on the Code of Ethics.

Purchasing managers received additional training on sustainable procurement. **TWG remains firmly committed to aligning with international best practice**, ensuring compliance with tax and regulatory requirements in all countries where it operates. To this end, it works with external advisers and continuously monitors regulatory changes and assesses their impact on Group activities.

Overall, the Group maintains internal controls, oversight mechanisms and continuous training programmes designed to strengthen a culture of integrity, reduce risk exposure and ensure ethical behaviour throughout the organisation.

CORRUPTION AND BRIBERY INCIDENTS

G1-4

↘ Incidents of corruption or bribery

At **TWG** there were no incidents and the Group was not subject to any legal action relating to corruption or bribery during the 2024 reporting period.

POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

G1-5

↘ Political influence and lobbying activities

No member of the Board of Directors of **TWG** held a position in public administration or a regulatory body during the two years preceding the 2024 reference period.

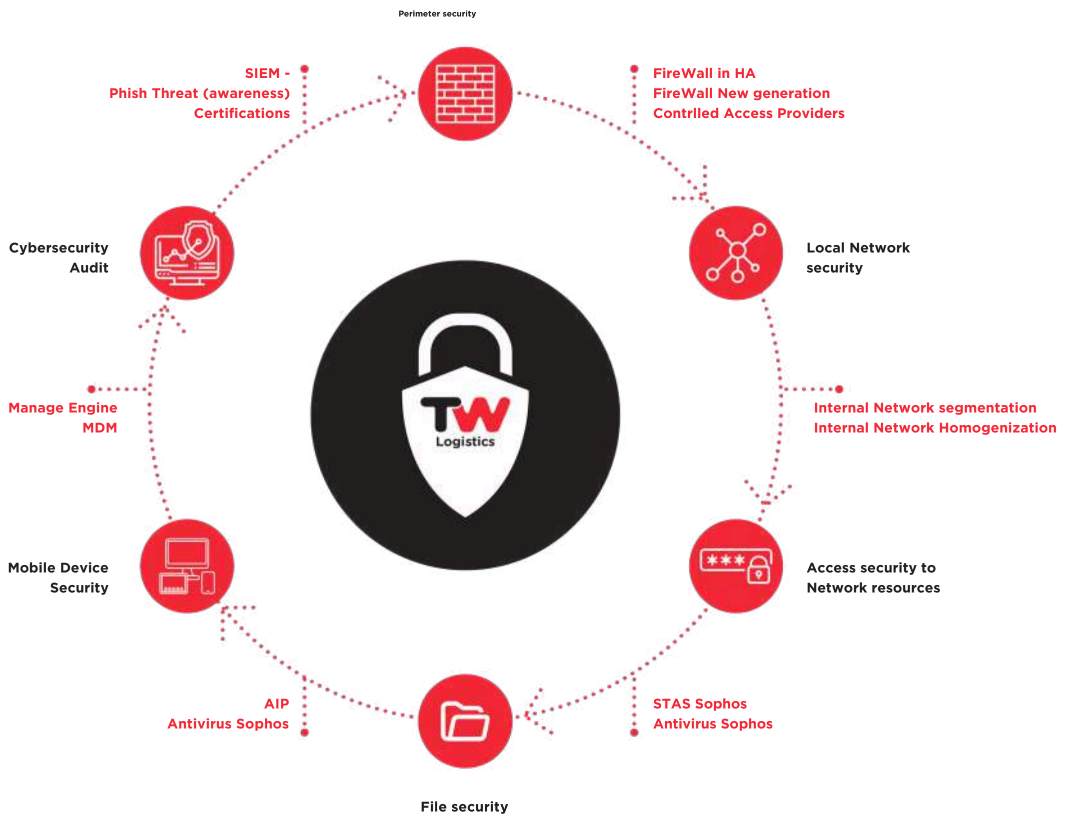
TWG does not provide any form of funding to political parties and is not registered in the EU Transparency Register or an equivalent transparency register in any Member State.

Information Security, Controls and Awareness Campaigns

TWG has a **Corporate Information SecurityPolicy** (IS Policy) establishing a common framework for security management throughout the organisation. It applies to all systems, employees and third parties with access to the Group's information systems and technology infrastructure, ensuring a consistent and uniform approach.

During the reporting period, TWG advanced the implementation of policies and procedures aligned with ISO 27001 to strengthen the protection of its systems and data. Key measures include:

- Multi-factor authentication (MFA) and access management.
- Network-security and infrastructure-protection measures.
- Threat-detection systems, including phishing, ransomware and third-party risks, using SIEM-type monitoring tools.
- A structured cybersecurity-incident management plan enabling an agile, coordinated response to potential events.
- Assessment and management of supplier-related risks.



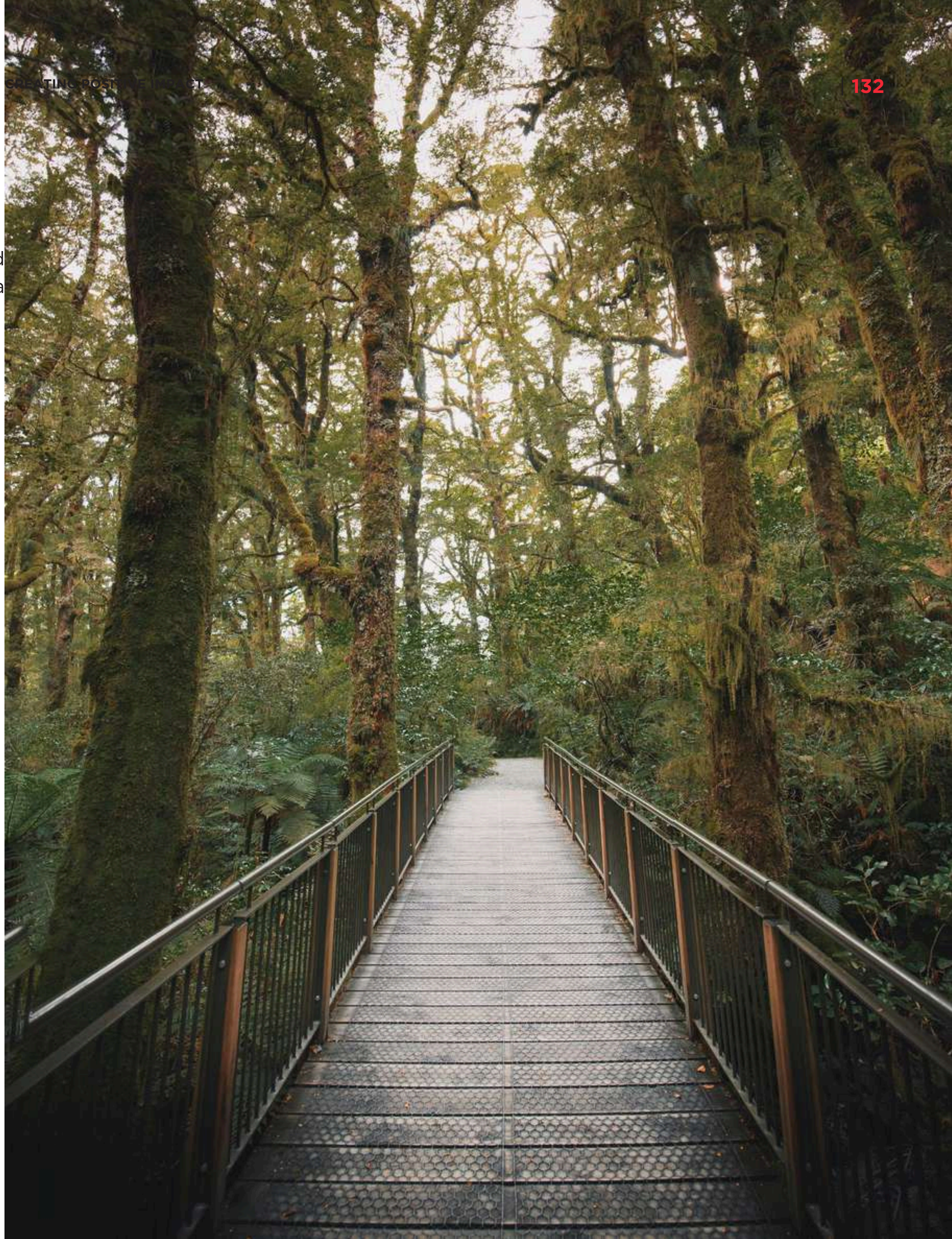
In addition, **TWG** runs an ongoing cybersecurity training and awareness programme for all employees covering threat identification (phishing), secure password management, data protection and incident response. This approach helps reinforce a culture of responsible and secure use of digital assets.

During **2025, TWG placed particular emphasis on these training initiatives**, supported by a dedicated information-security awareness report prepared by a specialist provider to assess and improve maturity in this area.

In addition, **certain Group plants hold TISAX certification** (Trusted Information Security Assessment Exchange), a standard recognised by the automotive industry for assessing information security.

As part of its continuous-improvement strategy, TWG has set an **objective for 2026 to obtain ISO 27001 certification** for a group of key sites (Scope I), including Pamplona and Illescas in Spain, Benavente in Portugal, Survilliers in France and the United Kingdom.

This certification will consolidate a robust management system aligned with international best practice, strengthening customer and partner confidence as well as the resilience and security of Group operations.



Specific notes on ESRS G1

ESRS DR	DATA POINT / METRIC	ACCOUNTING POLICY
G1-1	How TWG protects whistleblowers	All reports are managed in accordance with the Ethics Communication Channel guidelines through the Regulatory Compliance Committee (RCC). Only cases concluded within the financial year are disclosed.
G1-4	Legal action	The number of legal actions pending or completed during the reporting period in relation to anti-competitive behaviour 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 occurring within the reporting year.
G1-4	Number of confirmed incidents in which own workers were dismissedor disciplined for corruption- or bribery-related incidents	Determined by the number occurring within the reporting year.
G1-4	Number of confirmed incidents related to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	Determined by the number occurring within the reporting year.

Financial Reporting

12

12. Financial Reporting.

At the time of preparing this Report, the annual financial statements of **TWG** for the 2025 period are still pending final close. This information will therefore be included in the next Non-Financial Information Statement. The following section nevertheless provides a comparison of 2021 and 2024 in line with our annual accounts.

We also include a country-by-country comparison of turnover for 2025 versus 2024 (+20.74%).

No environmental, labour, tax or financial penalties were received during 2025.

Difference in turnover Y2025 vs Y2024 by country	2025 vs. 2024 (%)	2 .02 5	TWL	TWA	Toldos	Setland
Spain	3,2%	**175.962.907**	168.346.47 3		1.162.576	6.453.858
France	-3,8%	**54.192.750**	54.192.750			
Portugal	0,2%	**18.305.038**	18.305.038			
Mexico	16,2%	**21.927.461**		21.927.461		
USA	14,2%	**18.692.420**	3.117.990	15.574.430		
Germany	-3,5%	**10.950.549**		10.950.549		
Sweden	-6,7%	**5.763.596**	5.763.596			
UK	19,7%	**17.464.198**	17.464.198			
Australia		**3.074.389**	3.074.389			
Total		**326.333.308**	**270.264.434**	**48.452.440**	**1.162.576**	**6.453.858**

TW Group

2024		2023		2022		2021	
ITEM	**Amount (€ thousand)**	**ITEM**	**Amount (€ thousand)**	**ITEM**	**Amount (€ thousand)**	**ITEM**	**Amount (€ thousand)**
Turnover	298.528	Turnover	265.889	Turnover	235.979	Turnover	195.004
Profit before tax by COUNTRY		**Profit before tax by COUNTRY**		**Profit before tax by COUNTRY**		**Profit before tax by COUNTRY**	
Spain	1.534 €	Spain	2.626 €	Spain	8.233 €	Spain	438 €
France	208 €	France	546 €	France	1.881 €	France	726 €
USA	2.552 €	USA	1.565 €	USA	1.014 €	USA	1.244 €
Portugal	197 €	Portugal	-80 €	Portugal	-1.103 €	Portugal	268 €
UK	101 €	UK	416 €	UK	253 €	UK	35 €
Germany	-321 €	Germany	-957 €	Germany	1.677 €	Germany	577 €
Mexico	1.286 €	Mexico	1.316 €	Mexico	1.438 €	Mexico	1.449 €
Sweden	324 €	Sweden	401 €	Sweden	-154	Sweden	0
Income taxes paid	**1.425 €**	**Income taxes paid**	**1.410 €**	**Income taxes paid**	**2803**	**Income taxes paid**	1158
Public grants received	**0 €**	**Public grants received**	**0 €**	**Public grants received**	**0 €**	**Public grants received**	0 €
Public debt							
Cofides	4.000 €	Cofides	7.000 €	Cofides	9.000 €	Cofides	9.000 €
ICO	15.253 €	ICO	19.493 €	ICO	23.354 €	ICO	22.850 €

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LIST OF MATERIAL DRs	PARAGRAPH OR PAGE REFERENCE	LIST OF MATERIAL DRs	PARAGRAPH OR PAGE REFERENCE	LIST OF MATERIAL DRs	PARAGRAPH OR PAGE REFERENCE	LIST OF MATERIAL DRs	PARAGRAPH OR PAGE REFERENCE
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ESRS 2 SBM-1 Involvement in activities related to tobacco cultivation and production paragraph 40 (d) iv			Commission Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1, Commission Delegated Regulation (EU) 2020/1816, Annex II				n/a
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ESRS E1-9 Breakdown of the carrying value of real-estate assets by energy-efficiency class, paragraph 67 c).		Article 449 bis of Regulation (EU) n.o 575/2013; Commission Implementing Regulation (EU) 2022/2453 of the Commission, paragraph 34; Plantilla 2: Banking book - Climate change transition risk: Loans secured by real estate - Energy efficiency of collateral					n/a
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ESRS 2- IRO 1 - E4 paragraph 16 b)	Indicator 10 Table 2 del Annex 1						n/a
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ESRS E4-2 Sustainable agricultural practices or policies, paragraph 24 b)	Indicator 11 Table 2 del Annex 1						n/a
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ESRS S2-1 Policies related to value-chain workers, paragraph 18	Indicator 11 y n. 4 Table 3 of Annex 1						67
ESRS S2-1 Failure to respect the principles set forth in the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 19	Indicator 10 Table 1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II Commission Delegated Regulation (EU) 2020/1818, Art 12 (1)		Section I, Subsections II and III. Social and employee information and respect for human rights: work organisation		67

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Article of Law 11/2018	Information required by the Non-Financial Information Law	Link to GRI indicators	Section
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44.6a	Markets in which it operates: headquarters location and operating locations	GRI 102-3, GRI 102-4, 102-6	6
44.6a	Organisation 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 assessment: methodology and material matters.		8
Environmental matters			
44.6d	Main environmental risks affecting the organisation, including business relationships, products or services that may have negative effects, and how the Group manages such risks, explaining the procedures used to identify and assess them. Information on identified impacts, including a breakdown, particularly the main short-, medium- and long-term risks.	GRI 102-15	8
44.6b - 44.6c	Policies and commitments. Due diligence procedures applied to identify, assess, prevent and mitigate significant risks and impacts, and verification and control procedures, including the measures adopted. 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 applicable, health and safety	GRI 102-15	8
44.6 -I-	Environmental assessment or certification procedures		9

Article of Law 11/2018	Information required by the Non-Financial Information Law	Link to GRI indicators	Section
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
Pollution			
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 (emissions other than CO2eq, i.e. noise, light pollution, odours, vibrations, particulate matter, NOx, SOx, CO, VOCs, 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 energy consumption	GRI 302-1	8
44.6 -I-	Measures taken to improve energy efficiency	GRI 302-4	8
44.6 -I-	Use of renewable energy	GRI 302-1	8
Climate change			

Article of Law 11/2018	Information required by the Non-Financial Information Law	Link to GRI indicators	Section
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 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 medium- and long-term reduction targets established to reduce greenhouse gas emissions and the means implemented to achieve them	GRI 305-5	8
Biodiversity protection			
44.6 -I-	Measures 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 employee matters			
44.6d	Main risks affecting the organisation regarding employment, equal treatment and opportunities for women and men, discrimination and inclusion of people with disabilities and universal accessibility. The procedures used to identify and assess them are explained, together with information on identified impacts and a breakdown of the main short-, medium- and long-term risks.	GRI 102-15	10
44.6b - 44.6c	Policies and commitments. Due diligence procedures applied to identify, assess, prevent and mitigate significant risks and impacts, and verification and control procedures, including the measures adopted. Results of those policies, including key performance indicators.	GRI 103-2	10
Employment			

Article of Law 11/2018	Information required by the Non-Financial Information Law	Link to GRI indicators	Section
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 employment contract types, annual average of permanent, temporary and part-time contracts by gender, age and professional classification	GRI 102-8, GRI 405-1	10
44.6 -II-	Number of dismissals by gender, age and professional classification		10
44.6 -II-	Average remuneration and its evolution, broken down by gender, age and professional classification or work of equal value	GRI 405-2	10
44.6 -II-	Gender pay gap; remuneration for equal jobs or the company average	GRI 405-2	10
44.6 -II-	Average remuneration of directors and executives, including variable remuneration, allowances, severance payments, long-term savings schemes and any other compensation, broken down by gender	GRI 405-2	10
44.6 -II-	Implementation of right-to-disconnect policies	GRI 103-2	10
44.6 -II-	Employees with disabilities	GRI 405-2	10
Work organisation			
44.6 -II-	Description of working-time organisation (shifts, overtime management, flexible working hours, etc.)	GRI 103-2	10
44.6 -II-	Description of measures to facilitate work-life balance and encourage shared responsibility by both parents	GRI 103-2 GRI 401-3	10
44.6 -II-	Number of absenteeism hours	GRI 403-9	10

Article of Law 11/2018	Information required by the Non-Financial Information Law	Link to GRI indicators	Section
Health and safety			
44.6 -II-	Description of occupational health and safety conditions	GRI 403-1 al GRI 403-7	10
44.6 -II-	Occupational accidents, particularly their frequency and severity, and occupational diseases, broken down by gender.	GRI 403-9, GRI 403-10	10
Social relations			
44.6 -II-	Description of the organisation of social dialogue, including procedures for informing and consulting employees and negotiating with them	GRI 103-2	10
44.6 -II-	Description of collective bargaining agreements, particularly regarding occupational health and safety	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 policies implemented in the field of training	GRI 103-2, GRI 404-2	10
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

Article of Law 11/2018	Information required by the Non-Financial Information Law	Link to GRI indicators	Section
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 forms of discrimination and, where applicable, diversity management	GRI 103-2	10
Respect for human rights			
44.6d	Main human-rights risks affecting the organisation, explaining the procedures used to identify and assess them. Information on identified impacts, including a breakdown, particularly the main 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 to identify, assess, prevent and mitigate significant risks and impacts, and verification and control procedures, including the measures adopted. Results of those policies, including key performance indicators.		10
Human rights			
44.6 -III-	Description of the implementation of human-rights due diligence procedures; prevention of human-rights violation risks and, where applicable, measures to mitigate, manage and remedy potential abuses	GRI 102-16, GRI 412-1, GRI 412-2, GRI 412-3	10

Article of Law 11/2018	Information required by the Non-Financial Information Law	Link to GRI indicators	Section
44.6 -III-	Complaints concerning human-rights violations	GRI 406-1	10
44.6 -III-	Description of measures implemented to promote and comply with the ILO core conventions concerning freedom of association and collective bargaining, elimination of discrimination in employment and occupation, elimination of forced or compulsory labour, and effective abolition of child labour.	GRI 407-1, GRI 408-1, GRI 409-1	10
Fighting corruption and bribery			
44.6d	Main risks affecting the organisation regarding corruption and bribery, explaining the procedures used to identify and assess them. Information on identified impacts, including a breakdown, particularly the main short-, medium- and long-term risks	GRI 102-15	11
44.6b - 44.6c	Policies and commitments. Due diligence procedures applied to identify, assess, prevent and mitigate significant risks and impacts, and verification and control procedures, including the measures adopted. Results of those policies, including key performance indicators.	GRI 103-2	11
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 organisations	GRI 102-13, GRI 201-1, GRI 415-1	11

Article of Law 11/2018	Information required by the Non-Financial Information Law	Link to GRI indicators	Section
Company information			
44.6d	Main risks affecting the organisation regarding its commitment to sustainable development, subcontractors and suppliers, consumers and tax information, explaining the procedures used to identify and assess them. Information on identified impacts, including a breakdown, particularly the main short-, medium- and long-term risks	GRI 102-15	8
44.6b - 44.6c	Policies and commitments. Due diligence procedures applied to identify, assess, prevent and mitigate significant risks and impacts, and verification and control procedures, including the measures adopted. 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 activities on employment and local development (e.g. expenditure on suppliers and local suppliers)	GRI 203-2, GRI 413-1	8,9,10,11
44.6 -V-	Description of the impact of the company's activities on local communities and the territory	GRI 413-1	8,9,10,11
44.6 -V-	Description of relationships with local community stakeholders and the forms of dialogue with them	GRI 102-43	6
44.6 -V-	Information on partnership or sponsorship actions	GRI 413-1, GRI 201-1	10

Article of Law 11/2018	Information required by the Non-Financial Information Law	Link to GRI indicators	Section
Subcontracting and suppliers			
44.6 -V-	Information on the inclusion of social, gender-equality and environmental matters in the procurement policy	GRI 103-2	11
44.6 -V-	Description of how suppliers' social and environmental responsibility is considered in business relationships	GRI 308-1, GRI 414-1	9,10,11
44.6 -V-	Description of supplier monitoring systems and audits and their results	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 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-	Corporate income taxes paid (not accrued)	GRI 201-1	12
44.6 -V-	Public subsidies received	GRI 201-4	12

TWG's Board of Directors (BoD) has considered and adopted TWG's Sustainability Report for the period from 1 January to 31 December 2025, ensuring quality and transparency and reflecting its importance to our company. The Y2025 Sustainability Report was prepared by the Sustainability Director using quantitative and qualitative data provided by the heads of Environment, HR, Quality and Health & Safety, Purchasing and Finance, in accordance with the principles set out in the reporting approach described, and provides a true and fair view of the impact of **TWG** on society and the environment. Pamplona, 20 March 2026

Board of Directors:

- Carlos Llonis
- Virginia Michelena
- Alfredo Llonis
- Jesús Sanz
- Vicente Tamarit

Sustainability Committee-CSOS:

- Virginia Michelena – VP & CHRO
- Blanca Pizarro – Controller TWA
- Joseba Saez – HSQE TWL
- Andrea San Segundo – HSQE Department
- Daniel Sanchez – Purchasing Manager TWG
- Jose Pulido – HR Manager TWL

For further information, please contact:
sustainability@tw-group.com

Board of Directors

Carlos Llonis
Virginia Michelena
Alfredo Llonis
Jesús Sanz
Vicente Tamarit

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Sustainability Committee-CSOS

Virginia Michelena — VPyCHROTWGroup
Blanca Pizarro — ControllerTWAutomotive
Joseba Saez — HSQETWLogistics
Andrea San Segundo— HSQEDepartment

Daniel Sánchez — Purchasing Manager TW Group
Jose Pulido — HR Manager TW Logistics

—

For further information, please contact:

Sustainability Committee – CSOS TWG
sustainability@tw-group.com

Verifications

DECLARACIÓN DE VERIFICACIÓN

EQA

Declaración de Verificación Independiente del Estado de Información No Financiera de TRUCK & WHEEL GROUP, S.L. y sociedades dependientes del ejercicio 2025

European Quality Assurance Spain, S.L. (en adelante EQA), con domicilio social en C/Joaquín Bau, nº 2, 1ª Planta, Esc.Dcha. 28036, como organismo de verificación de tercera parte, y en su representación Dª Esperanza Martínez, Directora de Certificación de la entidad y persona responsable de la toma de decisión.

DECLARA QUE:

TRUCK & WHEEL GROUP, S.L., con domicilio social en Pol. Arazuri-Orcoyen, calle E 31.170 Arazuri (Navarra) ha contratado a EQA, a través de su representante legal, D. Carlos Llonis Irigoyen, la realización de la verificación independiente del Estado de Información No Financiera de su organización.

De acuerdo con el artículo 49 del Código de Comercio, EQA ha realizado la verificación, con alcance de seguridad limitada del Estado de Información No Financiera (en adelante EINF) correspondiente al ejercicio anual finalizado el **31 de diciembre de 2025**, de **TRUCK & WHEEL GROUP, S.L.** (en adelante "la organización") y sus sociedades dependientes, que forma 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** incluida en el citado Estado de Información no Financiera, siendo los datos y la información de naturaleza histórica.

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 incorrección material. El EINF se ha preparado de acuerdo con los contenidos recogidos en la normativa mercantil vigente, seleccionados de acuerdo con lo mencionado para cada materia en ÍNDICE DE CONTENIDO, del citado EINF.

Asimismo, la dirección de la organización es responsable de definir, implementar, adaptar 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.

Número: 02.767.956

Fecha de Verificación: 13 / 05 / 2026

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European Quality Assurance Spain, S.L. (EQA España) - Calle Joaquín Bau nº 2 | 1ª Planta | Escalera Derecha | 28036 Madrid
Queda sujeto al "Procedimiento de Certificación y Condiciones Generales" establecido por EQA

DECLARACIÓN DE VERIFICACIÓN

EQA

Independencia y Competencia

El equipo auditor ha cumplido los requerimientos de independencia, imparcialidad y demás exigencias de ética, basando 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 contempla en la Ley 11/2018.

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 & WHEEL GROUP, S.L.**, de 30/04/2026 versión final, 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 el "Programa EQA – Verificación de Informes de Sostenibilidad" 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 sustancialmente inferior al de un encargo de seguridad razonable y, por lo tanto, la seguridad proporcionada es menor.

Los procedimientos realizados se basan en el juicio profesional de los expertos que han intervenido en el proceso e incluyen consultas, observación de procesos, evaluación de documentación, procedimientos analíticos, y pruebas de revisión por muestreo 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 procesos de los que dispone la organización para determinar cuáles son 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 de una muestra, y realización de pruebas sustantivas de la información cuantitativa y cualitativa contenida en el EINF.

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DECLARACIÓN DE VERIFICACIÓN

EQA

Conclusiones de la Verificación

Como resultado de los procedimientos que se han realizado y de las evidencias obtenidas, no ha llegado a nuestro conocimiento ninguna cuestión que nos lleve a pensar que la información contenida en el EINF de **TRUCK & WHEEL GROUP, S.L. y sus sociedades dependientes**.

correspondiente al ejercicio anual finalizado el **31/12/2025**, no está presentada de manera adecuada, ni que existan incorreciones 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 emite a la dirección de **TRUCK & 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.

ENAC

Esperanza Martínez García
Directora de Certificación

Número: 02.767.956

Fecha de Verificación: 13 / 05 / 2026

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European Quality Assurance Spain, S.L. (EQA España) - Calle Joaquín Bau nº 2 | 1ª Planta | Escalera Derecha | 28036 Madrid
Queda sujeto al "Procedimiento de Certificación y Condiciones Generales" establecido por EQA