
NON- FINANCIAL INFORMA- TION STATEMENT

Sustainability Report

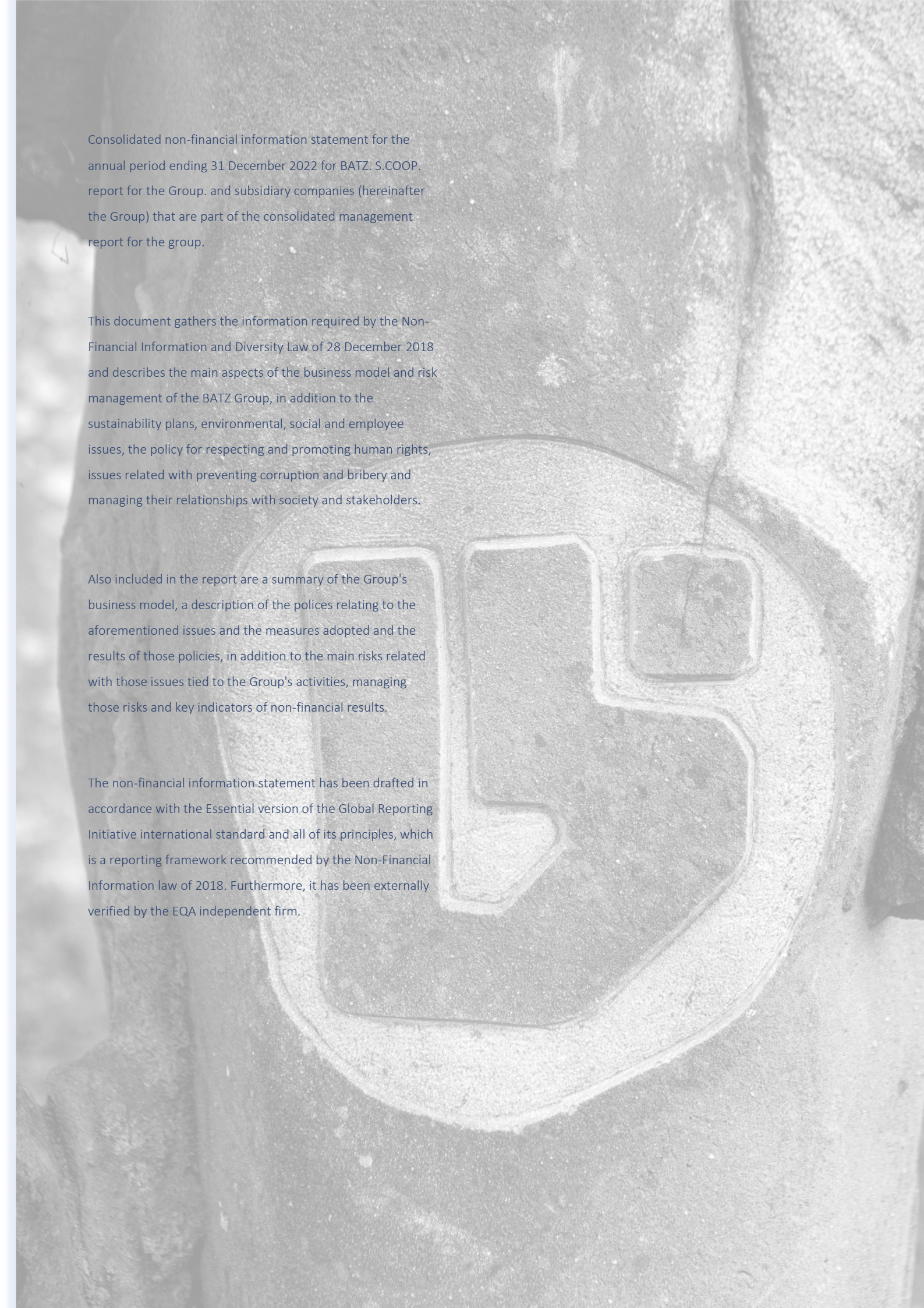
BATZ Group

2022

Date: 29/03/2023

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Consolidated non-financial information statement for the annual period ending 31 December 2022 for BATZ. S.COOP. report for the Group. and subsidiary companies (hereinafter the Group) that are part of the consolidated management report for the group.

This document gathers the information required by the Non-Financial Information and Diversity Law of 28 December 2018 and describes the main aspects of the business model and risk management of the BATZ Group, in addition to the sustainability plans, environmental, social and employee issues, the policy for respecting and promoting human rights, issues related with preventing corruption and bribery and managing their relationships with society and stakeholders.

Also included in the report are a summary of the Group's business model, a description of the policies relating to the aforementioned issues and the measures adopted and the results of those policies, in addition to the main risks related with those issues tied to the Group's activities, managing those risks and key indicators of non-financial results.

The non-financial information statement has been drafted in accordance with the Essential version of the Global Reporting Initiative international standard and all of its principles, which is a reporting framework recommended by the Non-Financial Information law of 2018. Furthermore, it has been externally verified by the EQA independent firm.

I. OUR BUSINESS MODEL

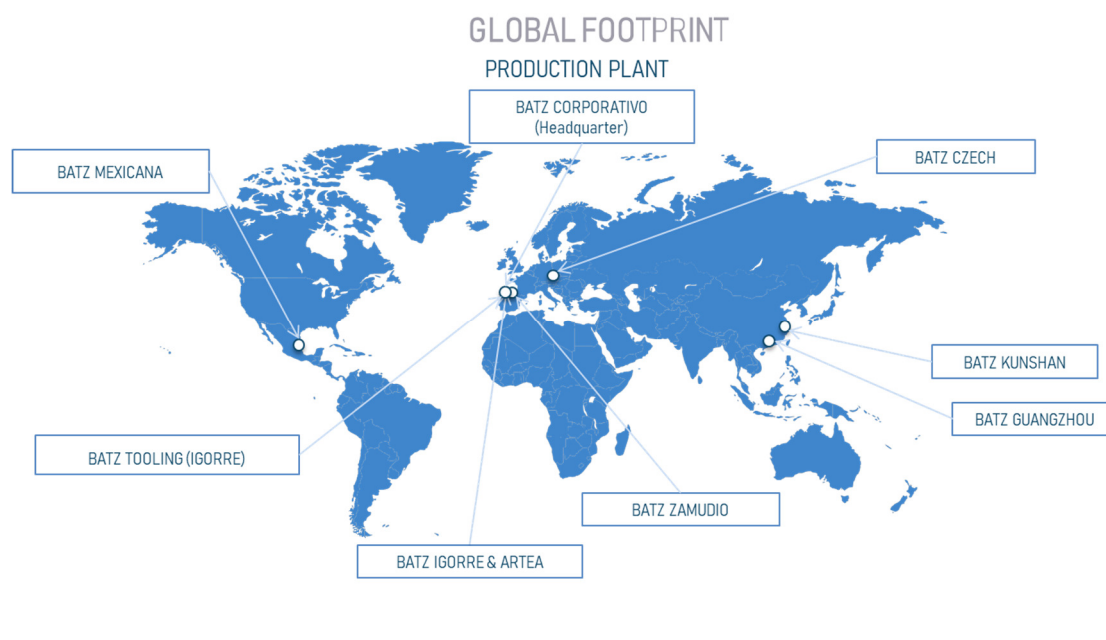
No. 1 - Traceability table in compliance with the Non-Financial Information and Diversity law

1.1 ABOUT US

We are BATZ, a global supplier of products and services for the automotive sector. Founded in 1963 and based in Igorre (Northern Spain), we are currently a solid industrial group thanks to the commitment and customer focus of our professionals.

We evolve and grow with our customers, getting involved from the initial phase in the supply of innovative solutions, focusing on the design and manufacture of products characterised by providing attributes of safety, weight reduction and ergonomics, which promote a more efficient and sustainable mobility, fully aligned with the main trends in the mobility sector.

BATZ Group is made up of around 1300 professionals distributed around the world and we have several production plants and offices, which allows us to accompany our customers in their current and future challenges, wherever they are.



Our identity

BATZ was created as a cooperative located in Northern Spain with an international outlook which, throughout its more than half-a-century existence, has managed to perfectly combine its expansion and global nature with the roots and commitment it maintains in its local environment.

In fact, because it is a Group upheld by the corporate model, we have already covered a lot of ground as a socio-economic transformation project. However, in 2022 we wanted to take another look at the cooperative project in order to align the company bodies in pursuit of the contributions and commitment of all workers so Batz can once again be a cooperative, profitable and sustainable project. That has made it possible for us to make decisions in an agile and definitive way in a complex and uncertain situation.



Transformación Social

Gobernanza

Estrategia de Negocio

Valores

Cultura

Identidad

Visión del Proyecto Socioempresarial de BATZ (lo que aspiramos a ser)



A participative and shared belief

BATZ is a **competitive** and **profitable** cooperative project that is the fruit of the efforts of **committed** people with **solidarity** and an **entrepreneurial spirit**. We are defined by:

- Our commitment to cooperative principles, which are the fundamental basis for developing a different business model that is democratic and shows solidarity and is equitable and committed to sustainability and social transformation
- We believe in the cooperative legacy and, because of that, in addition to a better and more solid business project, we want to leave a model of development that is more sustainable for people and the planet to coming generations
- We are a global company and, loyal to our principles, we are committed to the socio-economic development of the people who work on our project and the places where we are embedded
- Our origin and root are in Arratia. That is why we have decided to act globally, to keep following up on our initial ambition to create opportunities for development in Arratia and Biscay by creating work with added value, distributing wealth and supporting all kinds of initiatives for building a more fair and diverse society that has more solidarity and is open to the world, while strengthening our own Basque identity.

And the participation of all the parts of the cooperative, in addition to the automotive division of MONDRAGON and the Otalora team was vitally important to achieve that. The proposal was presented to the entire collective of people that make up Batz in small groups that were in favour of participation and contribution and it was judged positively.

Our business

We develop our activity in the automotive sector, specifically in the areas of serial production and tooling.

The extensive experience of our professionals in the design and manufacture of lightweight composite structures using new materials and processes, and of active aerodynamic components, together with our qualification and recognition in the design and manufacture of mechanical and mechatronic control systems, make us a first-class supplier for the main car manufacturers. We also develop solutions for the implementation of new advanced materials by improving their forming processes in a wide range of steels and aluminium, both in hot and cold forming, offering a comprehensive service that ranges from the conceptual design of the product to its fine-tuning.



Our presence in the aerospace sector was given a boost in 2002 with specific resources for the activity. The diversification of the current die-making business was promoted with the aim of creating specialised jobs through the commercial exploitation of advanced knowledge of forming and saturation of means in the aerospace industry.

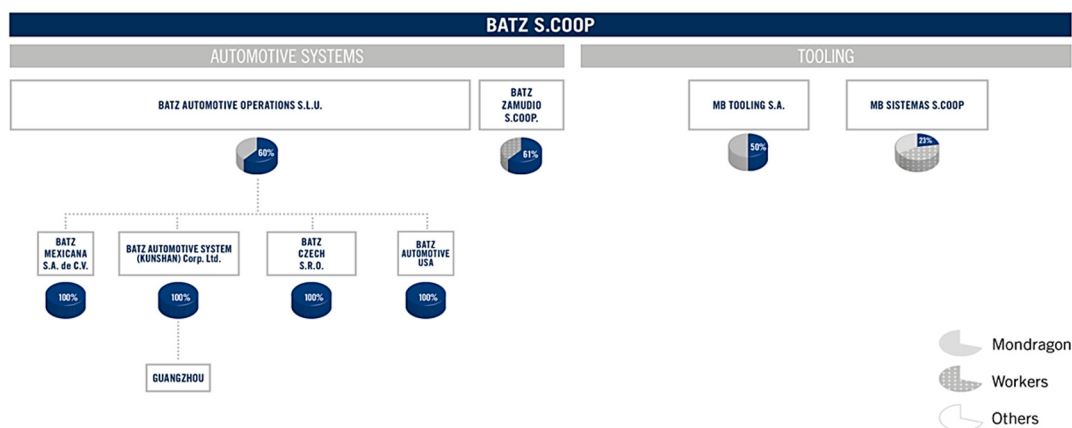
1.2 2022 ORGANISATIONAL STRUCTURE

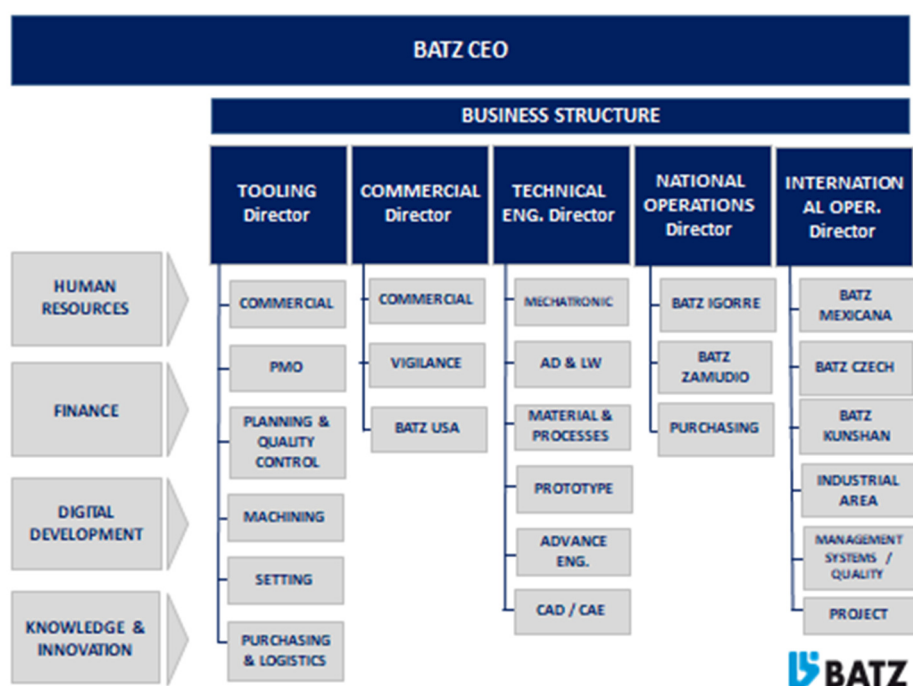
The BATZ Group is committed to a business model that is supported by cooperative values which sets the company apart.

These operating principles are transferred to the corporate level through a series of identifying features in the management of the Group that combine the autonomy and responsibility of each of the businesses with common rules and shared decision-making. Our organisational model is essentially structured into business units, as described, which focus on business development, products, processes and strategic projects, and for which the corporate holdings are shown in the following diagram:

Likewise, BATZ has management bodies adapted to that corporate structure that make it possible to unify the company's key relationships and strategic decisions.

It is an organisation for a global automotive market where the levels of integration and transversality are strengthened. It is a structure that favours proximity and cohesion between the Group Management and business activities and is advantageous to coordination between the areas, with a marked orientation towards clients, as shown in the picture.

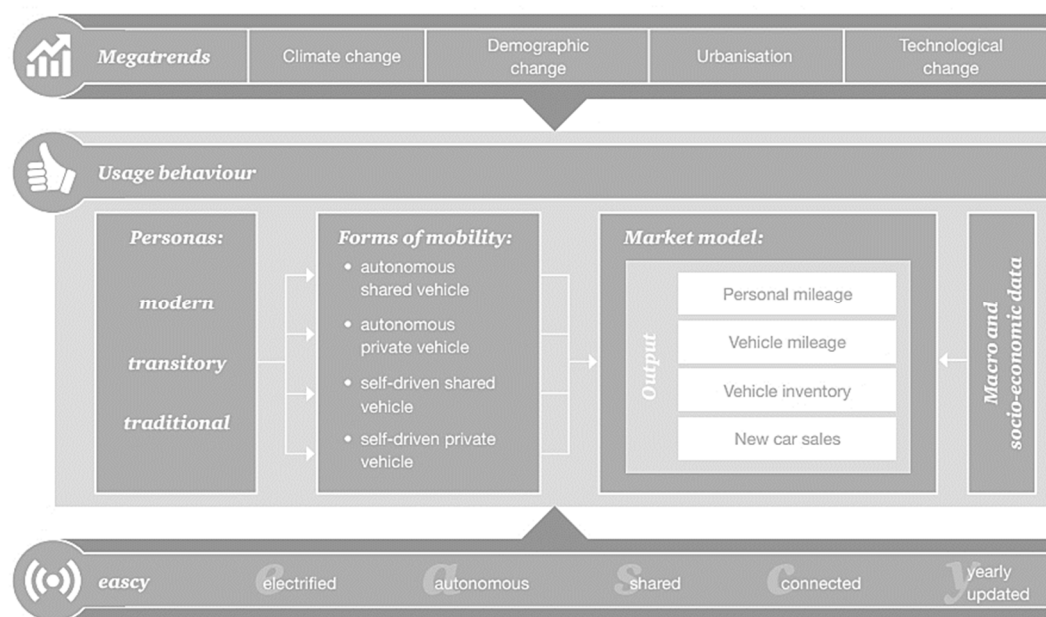




1.3 OUR CHALLENGES

The emergence of new automotive trends, such as digitisation, shared use or vehicle electrification, are defining the current situation in this industry and creating new scenarios that, at first, may seem uncertain. In fact, the acronym EASCY, which stands for electrified, autonomous, shared and connected and includes yearly updates, has already been coined.¹

Fig. 1 Market model of the transformation of the automotive industry



¹ Easzy: the five dimensions that will transform the automotive sector, PwC

Likewise, the global nature of the industry makes us be very attentive to any shifts in the economy and international politics, because they may affect exchange rates, raw materials prices or lead to greater protectionism.

That paradigm shift involves reinventing ourselves so we can respond to smart and sustainable mobility. We need to be capable of adapting to those dynamics and share and find efficiency throughout the entire value chain. All of that means investments must be made, taking into account that the profitability of commodities suppliers is under pressure. Those challenges involve weaving relationships in a larger ecosystem and being attentive, not only to our supply chain, but to any economic or geopolitical shifts that, as we have seen recently, can cause deep disruption.

2022, New Challenges for the Industry

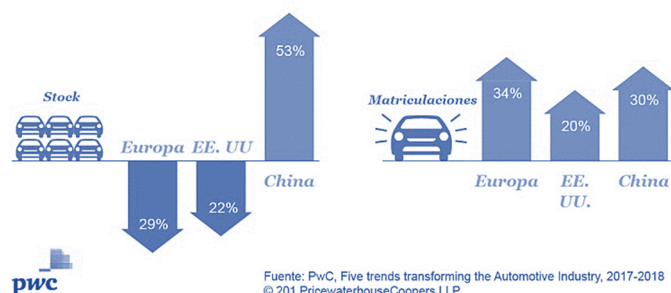
2022 was a turbulent year for the automotive sector; the perfect storm.

- There are previously unseen increases in the prices of raw materials like steel, aluminium, polymers (petroleum products) and others.
- There was a shortage of components, especially microchips, semiconductors and electronic components, which caused a lot of uncertainty and volatility in managing orders, changes and delays in programmes and a fall in vehicle production.
- There was an increase in energy costs, including gas and electricity, that cannot affect prices for OEM clients.
- Logistics costs increased.
- There were problems due to the pandemic and the 0 Covid policy in China.
- The Ukraine conflict made the situation worse.
 - Energy costs increased again
 - Production stoppages in auto manufacturing plants in central Europe because of a lack of components from Ukraine (cables), that affected all the suppliers of those plants

All of that had an impact on the automotive supply chain.

- There was a loss of margins because of the steep increase in costs that could not be passed on and the fall in business volume because of the decline in vehicle production. Not much room to negotiate with clients
- There was a loss of volume because of the contraction of the market and the fall in vehicle production.

En 2030, el stock de vehículos en algunos de los principales mercados se reducirá, mientras crecerá sustancialmente el número de matriculaciones.



- Liquidity issues in companies

1.4 HOW WE DO IT

Taking into account the difficulties of the last few years and the climate of the industry described above, the priorities for 2022 were focused on re-dimensioning the activities, financing and profitability of the businesses. The four challenges taken on were:

- Re-dimensioning the die-making business to 12 million € of billing and not drawing resources from the globality of Batz
- Improving the automotive business with a business recovery of €200 million and a reorganisation of the business in two directions:
 - Domestic, centred in Bizkaia, that includes our plants in Igorre and Zamudio
 - International, that includes our projects in China, Mexico and the Czech Republic
- Improving quality and taking a step in recovering the path of positive profitability for the international subsidiaries
- Strict management of treasury and renegotiating banking commitments
- Adjust the corporate and general structure to the real margin generating capacity
 - Cutting fixed structure costs
 - Reducing investments, with strict control over the approval process
 - Efforts by the collective to lower staff costs

- o Management of people so they contribute to Batz where it is needed most

To achieve that we have focused on four main challenges. A new concept of mobility is the most important issue that needs to be resolved in the automotive sector, the field in which we carry out our business activities. The transformation must include the “palette of colours” of sustainability in its entirety. Investing in human capital, progressing towards emissions neutrality, adopting advanced management models and meeting society's expectations are only a few of the levers that can be pulled to bring about the change and let us stay competitive in our sector.

Because of that, it is more than necessary to have a clear positioning and strategy that lets us adapt products, processes and even our business model to ensure sustainability.

Our goals and strategies

Contribute to a better world by providing global, innovative and sustainable mobility solutions



We are a project with optimal size and positioning to keep progressing in a volatile, ambiguous, uncertain and complex environment.

We will increase our differential value by promoting the sustainability of our products and reinforcing our global offer and “glocal positioning” with a multi-product, multi-technology and multi-client focus.



We will ensure our competitiveness through standardisation, efficiency and lowering the environmental impact of our processes.



We will be an organisation that is inclusive of our group's diversity and promote the integration of BATZ into the communities where it is present. *(See the initiatives in sections 6 and 9 of this report)*

All of that is propelled by drivers of transformation that will make a decisive contribution to achieving BATZ's corporate ambition.



Innovation, a tool for adaptation to uncertainty

Contribute to a better world by providing global, innovative and sustainable mobility solutions That is our corporate ambition and it is the position we take with an eye on the future.

We provide solutions with better features and higher perceived value, like lightened structures, active aerodynamics and mechatronics. We respond to the enormous global challenge facing the automotive industry, a new concept of connected mobility that is more efficient and environmentally friendly. It is on the latter point where BATZ is strengthening our commitment to be a sustainable company, deepening our knowledge of the environmental impact of our products and processes, and identifying new value proposals to improve our competitiveness.

At BATZ we estimate that 88% of our carbon footprint is linked to our supply chains and, along those lines, we have set several challenges and goals for them. We have given a high priority to promoting the decarbonised economy in line with the strategic lines that have been defined by institutions, regulatory bodies and OEMs themselves. To make that trip, we are making progress in calculating our emissions in all scopes and setting up future scenarios where we can plan a NET ZERO roadmap. Furthermore, in June 2021 we joined the network of companies that make up the **Basque Ecodesign Center**, which is an initiative promoted by the Basque Government to pilot the methodologies and development of innovative projects that support preventing environmental impacts at the same time it improves the competitiveness of the member companies and their value chain. That action was framed by another of our strategic lines of work aimed at securing our supply chain in a sustainable way, combining efficiency and reliability at the same time we helped them in defining and implementing strategies and goals that contribute to cutting CO₂ and fighting climate change.



In addition, we keep working in the field of materials. We are adopting circular economy principles and participating in collaboration programmes like MIDAS (Hazitek) for finding new materials with a lower environmental impact and ALMA (EU Horizon) for reducing the weight of electric vehicle structures with its sights set on low-emissions mobility.

We are convinced that the world needs a new sustainability paradigm that takes the entire value cycle into account and lets us continue providing responses to global projects. And companies like us are agents of change in all of that. Because, as our corporate ambition makes explicit, sustainability is a strategic theme for all our stakeholders.

Creating value through co-innovation

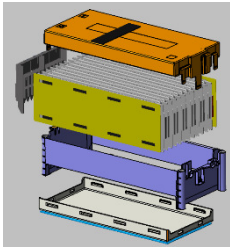
At BATZ we have deep-rooted the premise that to innovate is to face challenges in an efficient way. A culture of innovation and entrepreneurship that goes beyond the merely technological sphere and that we deploy throughout our entire value proposition. For many years we have been moving forward in a collaborative environment aimed at expanding and strategically reinforcing our capabilities, weaving an ecosystem that includes universities, technology centres and startups.

We are an active agent within our innovation and entrepreneurship ecosystem. In permanent relationship with different agents in the environment, our continuous participation in research programmes coordinated by the different public-private bodies stands out.

Progress in E-mobility 2022 Research Programmes

Batteries

SABRE



The Hazitek project is to obtain training and develop a battery pack for the eBus market. The goal is to expand knowledge about the internal and external components of batteries for electric vehicles and analyse the possibilities of supplying them in a competitive way. Modules will be developed and produced in collaboration with the consortium, in addition to a functional battery pack with them.



Circular economy

MIDAS

Materials
Innovative Technologies
Desarrollo componentes
Alta exigencia
Sostenibilidad



This is a Hazitek project for finding sources of recycled materials and evaluating their use in highly demanding structural parts and with non-conventional processes. BATZ leads the project in which we are researching new mixtures that include recycled materials for structural components using innovative technologies that let us increase vehicle sustainability all around. Specifically, at BATZ we will analyse three different material demonstrators and technologies, two of which are already in our portfolio. A third innovative structural demonstrator will be included that evolves a plastic dash panel from metal to composites in collaboration with an OEM.



ALMA (Advanced Light Materials and Processes for the Eco-Design of Electric Vehicles)



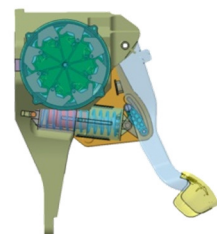
This project seeks to improve the efficiency and range of electric vehicles by reducing the overall weight of the vehicle. To those ends, ALMA will develop a multi-material modular platform with a combination of advanced high strength steel, hybrid metal laminates and structural composites in an experimental and virtual way with multi-scale modelling tools. BATZ will lead the project and development of alternative lightweight plastic components and processes for them in collaboration with the Ford OEM.



Mechatronics

NG-PED

The NG-PED project is a CDTI funded project that investigates the foreseeable requirements for pedals in future electric and autonomous vehicles. It is based primarily on the concept of a brake pedal without mechanical connection to the rest of the braking system, i.e. electronic connection. This implies the need for "feel simulator" systems (brake pedal feel emulator), retractable pedals, etc. In addition, plastic-injected brake pedals with WIT technology will be produced, which will be a world first. In the project, BATZ will develop a completely electronic pedal system with the maximum safety standards for any problem. In addition, they will develop lightened full-plastic pedals that have behaviour similar to the requirements of conventional metal pedals, electronic adjustment systems for the sensation felt by users of the vehicle and ergonomic retraction systems for the pedals, which are needed for autonomous vehicles. This project ended in the first quarter of 2022.



iRel4.0

The goal of this programme is to improve the reliability of the electronic components and systems to reduce error rates through the entire value chain. Batz will be responsible for developing the sensors used in the pedals.



i2LGARBI

Intelligent, connected and sustainable solutions will be developed for vehicle cabins by incorporating electronics and advanced materials. Batz, specifically, will focus on integrating the solutions into the pedals.



Smartlab

FORMULA 4.0

Polymeric material formulations will be developed using artificial intelligence tools. The project aims at optimising the opportunities given to us by artificial intelligence for analysing huge amounts of data and generating predictions that help us increase efficiency in developing new formulations.



Connected Industry 4.0

IC4BATZ

The production operations of BATZ will be computerised to implement management based on reliable, agile and secure information.



Cybersecurity

EDRACTIVA

Active protection of the EDR server and BATZ mobile devices will be implemented.

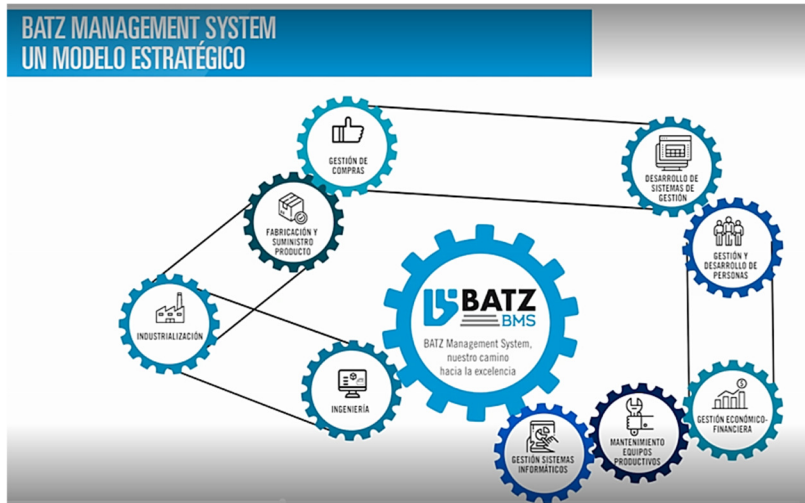


Check all the programmes in the Innovation section of our website www.batz.com.

2022 Lines of work

Evolving towards an organisation-wide model of excellence: from BATZ Manufacturing System to BATZ Management System

Continuously improving the global performance of the organisation is essential for maintaining production levels, reacting to potential internal or external changes and making it possible to create new opportunities. We are talking about **creating a sustainable competitive advantage and reaching profitable growth goals using a management system based in excellence, people and continuous improvement**.



- The BATZ Management System is our model of excellence based in continuous improvement that supports all of our organisation's business activities and takes into account the totality of processes in it and establishes a standard method for day-to-day management. In other words, that means the easiest, safest and most effective way to do a task. It is a process that began in 2020 and that throughout 2022 we consolidated in the levels defined in the organisation.

Along those lines, this year the training activities focused on the methodologies of the improvement projects. An example of that is the training sessions in our ERP management system. The consolidation of the newsletters in our plants within the BMS communications plan under the **Kaizen Support** pillar should be highlighted. It is enabling us to compress and accept the model, as well as its goals, and, consequently, greater involvement of teams.

We can highlight the continuity of the knowledge block in applying real time data analysis to improve the efficiency of the injection process.

In 2022 the deployment and follow-up of the strategy became consolidated in the area of international operations (China, Mexico and the Czech Republic) following the **Kaizen leaders** standards.

Likewise, we took important steps that year towards improving the standards of the **daily Kaizen** pillar, like implementing the multi-disciplinary meeting at the Kunshan plant or the meeting for industrialising new projects at the Artea plant.

In the area of **excellence at work**, we continue improving the management of our flows by redesigning the line and line edge at the plants of the international operations area and re-examining lay out, like what was done at our plant in Mexico. The work done in managing external logistics flows with the pull planning methodology with suppliers should be highlighted. An example of that is the results obtained at the Czech Republic Plant. Lastly, we would like to mention that we expanded the deployment of the implementation of the TPM methodology with the goal of improving the efficiency of the welding process at the Igorre plant.

BMS Advantages



Digital development, crucial in our business management

Sustainability and Cybersecurity Sustainability and cybersecurity are two key issues today. And, even though they may not seem related, they are closely linked. Sustainability means the capacity for keeping a balance between economic, social and environmental development in the long term, while cybersecurity is concerned with protecting IT systems and data against internal and external threats.

In a world that is more and more connected, cybersecurity has become an essential element for ensuring sustainability. Companies and organisations around the world depend on technology for their day-to-day operations, from communication to data management and automating processes. If those systems are compromised, either by a hacker attack or a technical failure, it can cause significant damage to productivity, security and the company reputation.

Furthermore, advances in technology and digitalization have led to higher consumption of energy and resources, which can have a negative impact on the environment. That is why sustainability is key for ensuring the continuity and stability of businesses and society in general. They contain the essence of change in the markets and social-business environment where BATZ plays an active role. They are motors of transformation that in the next decade will contribute decisively to achieving our corporate ambition

Sustainability

Initiatives that were carried out in 2022

- A purchasing manual for IT equipment was created.
- Mobile devices that were obsolete for Batz's business activities but suitable for everyday use were sold.
- IT equipment that was obsolete for Batz's business activities but suitable for educational purposes was donated to education centres.
- Good practices for sharing devices between different plants in the Batz group were established.
- The useful life of IT devices was extended by replacing parts that decrease the performance of the devices through use, like batteries.
- The "New life to avoid E-waste" project was presented at the European Week for Waste Reduction (EWW).

These are initiatives that make it possible for us to base our decisions on unique, accurate and integrated data at every level of management.

- Exploiting big data – IoT in injection technology This initiative is scalable to other technologies / products and makes it possible to monitor and analyse the production process in real time. *See the IC4BATZ Project*
- The management KPIs were optimised at all levels of the organisation based on accurate data management and integrating different data sources that were previously used independently.

Cybersecurity

IT system monitoring and threat detection and response

- An EDR (Endpoint Detection Response) technology system was implemented to protect the company's devices and infrastructure that combines a traditional anti-virus alongside monitoring tools that use artificial intelligence to provide a rapid and efficient response to more complex risks and threats.
- A SOC (Security Operations Center) was implemented that monitors the activities of the Batz network 24x7 and correlates information sent by the anti-virus, firewalls and more.
- An internal phishing campaign was done to raise awareness among users. Training in password security and ransomware attacks were done.
- The IT/OT networks were physically segmented.
- ISO27001 certification was renewed.
- The TISAX certification at Igorre was renewed and its scope was expanded at the Batz Czech and Batz Zamudio plants.

See EDRACTIVA Project

II. POLICIES

No. 2 - Traceability table in compliance with the Non-Financial Information and Diversity law

2.1 DESCRIPTION OF THE POLICIES

The BATZ Group has a set of corporate policies that develop the principles and guidelines that govern our actions; they express the recognition and integration of CSR in our management and governance while shaping our relationship with various stakeholders and helping us to identify, prevent and address any risk of negative impact.



With the vertiginous speed at which new technologies, ways of working and ways of interacting advance, companies today have had to handle significant changes in a short period of time. Those changes have also affected the expectations that stakeholders we have relationships with have for our project.

The firm changed in 2022, because a new director was taken on board in late 2021.

Políticas	Descripción
Código de conducta	Documento que recoge diversas normas y procedimientos que regulan el comportamiento responsable de todas las personas que forman BATZ, extendiéndose, en la medida de lo posible, a Proveedores, Personas Asociadas y Clientes.
Política RSC	Marco base para la integración de la responsabilidad social en el modelo de negocio de BATZ Group
Memoria de sostenibilidad	Documento de divulgación frente a grupos de interés internos y externos en relación al desempeño de la organización con respecto al objetivo de desarrollo sostenible
Política medioambiental	Marco que establece objetivos ambientales alineada con la gestión ambiental estratégica.
Política SLL	Marco donde se establecen los principios generales de actuación en materia de Seguridad y Salud Laboral
Política de calidad	Política en la que se definen las directrices (visión, misión y valores) sobre las que desarrolla su actividad el negocio y en el que adquiere el compromiso de facilitar los medios necesarios para su cumplimiento y revisión periódica, así como de promover una comprensión y difusión de la misma incluyendo a todas las partes pertinentes.
Política para la seguridad de la información	Política orientada a garantizar la protección eficaz de la Información, aportando valor añadido durante todos los procesos, garantizando la seguridad, confiabilidad y estabilidad de los sistemas. Todo ello, trabajando desde la mejora continua.
Política de proveedores	Política que define los requisitos que deben mantener nuestros proveedores en materia de ética empresarial, protección del medio ambiente, conservación de los recursos, derechos humanos y normas sociales. La política se basa en las normas legales e internacionales vigentes y en los principios fundamentales de gobernanza, responsabilidad social y medio ambiente
Protocolo contra el acoso sexual y por razón de sexo	Protocolo donde se recogen procedimientos y recursos para la prevención y atención, en su caso, de los posibles casos de acoso sexual o por razón de sexo que pudieran darse en BATZ.
Plan de igualdad	Documento que recoge un conjunto ordenado de medidas, adoptadas después de realizar un diagnóstico de situación, tendentes a garantizar la igualdad de trato y de oportunidades entre mujeres y hombres y a eliminar la discriminación por razón de sexo
Política de selección y desarrollo	Política que tiene como objetivo concretar los puntos principales que, todas las empresas que conforman BATZ Group debieran aplicar en sus procesos de selección y desarrollo de personas con la finalidad de contar con un equipo de profesionales alineados con la misión, visión y los valores de la empresa.
Política de movilidad internacional	Documento que recoge los puntos que afectan a las diferentes dimensiones que entran en juego en cualquier proceso de expatriación en BATZ Group, como son la dimensión económica, la profesional, la psicológica, la sociocultural y la familiar.
Política de comunicación	Documento que establece y define el marco de referencia para la gestión integral de la comunicación, incluyendo los diferentes públicos objetivo y los correspondientes canales de comunicación.
Manual de gestión de la seguridad de la información	Marco de referencia que establece las directrices para la implantación del Sistema de la Seguridad de la Información en la actividad de BATZ Group, así como las responsabilidades y autoridades del mismo.
Política de conciliación laboral y familiar	Documento que recoge mecanismos en materia de permisos, excedencias o reducciones de jornada permiten
Mapa de profesiones	Marco donde se integran las profesiones, su descripción y el rango retributivo.

2.2 POLICY OUTCOMES

No. 3 - Traceability table in compliance with the Non-Financial Information and Diversity law

Our management system

Excellence and sustainability are two terms that make an indissoluble tandem in any organisation that has made efficiency a goal. That scope of action includes effectively deploying projects that are key to quality and the industrial strategy throughout the Group with a **single and global management system** that ensures compliance with standards, policies and lessons learned throughout the entire organisation. Integrating the management system was done in 2021.

The process involved unifying the tools that help us evaluate the solidity and quality of our policies and management, in addition to certification based on the main international standards that provide guidelines for defining and maintaining those systems.

Our management system consists of the combination of the organisational structure, action procedures, and necessary processes and resources such that its effectiveness constantly improves. Each of its scopes has a common structure defined by ISO to align with international standards, the high level structure (HLS). The requirements are thus defined in an order coherent with the organisation's planning and process management. All the requirements of each standard certified: ISO 9001, IATF 16949, ISO 14001, ISO 45001, ISO 9100, ISO 27001, as well as customer-specific requirements or those derived from legal regulations, are evaluated and included in the different processes that make up our management systems.

On the one hand, we have a system for measuring our performance on the corporate intranet, which is updated monthly by each area, plant or goal manager. A scorecard broken down into indicators, which enables us to monitor them periodically and to detect and correct any deviation in the measures adopted practically in real time.

On the other hand, each management system ensures that its effectiveness and efficiency is maintained through the implementation of continuous improvement and the adoption of a process-based approach. The monitoring and evaluation of these actions is carried out in the operational meetings of each process, as well as in the operational and strategic committees, both at group, business and plant level, with a minimum of monthly monitoring.



Both the management systems applicable to each plant and the certifications obtained are available on the BATZ website: <https://www.batz.com/es>.

Aligned with our clients' sustainable strategy

The effectiveness of our management system, and the progress we make with it, have also been endorsed by our clients. In 2022, we continued to achieve excellent ratings in our sustainability questionnaires for OEMs, which assess key indicators on environmental issues, labour practices, ethical management, human rights, key indicators on environmental issues, labour practices, ethical management, human rights..... We obtained an **average of 88% on the NQC platform** (Volkswagen, BMW, Toyota, Volvo) considering all our plants and **silver acknowledgement in Ecovadis** (Groupe PSA, Renault, GM) at a group level, which puts us in the top 25 companies in the sector as evaluated by the latter platform. Both of them are international leaders in monitoring sustainability in global supply chains and they evaluate the supply chains based on size, sector and country.



That fact backs up the **notable progress of the BATZ Group in terms of corporate social responsibility**. Consequently, in the last four years we have improved our score in ASG **factors thanks to the work done by everyone at our organisation** and we should see that as a reinforcement that encourages us to keep up our efforts for continuous improvement.

Our policy outcomes



Medioambiente: el 100% de nuestras plantas están certificadas según ISO 14001. Así mismo, destacar la nueva política ambiental que incluye la reducción de nuestra huella de carbono, y la preocupación por implementar acciones que mejoren la sostenibilidad energética, como las auditorías energéticas en plantas productivas. Además de verificar la optimización de los procesos productivos, resultando en una reducción de los residuos.



Prácticas laborales y derechos humanos: somos reconocidos como empresa con un sistema de gestión avanzado en relaciones laborales y derecho humanos, destacando nuestras políticas y acciones en estas materias así como la gestión de temas de salud y seguridad laboral.



Ética: señalar nuestro trabajo en cuanto a la garantía de la seguridad y confidencialidad de la información, así como la observación de las diferentes políticas de ética empresarial y puesta en marcha de mecanismos estructurales para hacer frente a las violaciones de las mismas.



Compras sostenibles: acciones realizadas por BATZ para facilitar el desarrollo de nuestros proveedores así como la integración de cláusulas sociales y ambientales en contratos con los mismos, y el análisis de riesgos en estos proveedores.

III. SHORT, MEDIUM AND LONG TERM RISKS

No. 4 - Traceability table in compliance with the Non-Financial Information and Diversity law

The main risks we face at BATZ Group and how to address them in the long term have not changed substantially compared to previous years, and are directly related to the trends in our industry, as described in sections 3 and 4 of this report. There are trends in our market, to which should be added the "struggle for talent", the management approach to which is described in sections 6 (social and personnel issues) and 9 (Society).

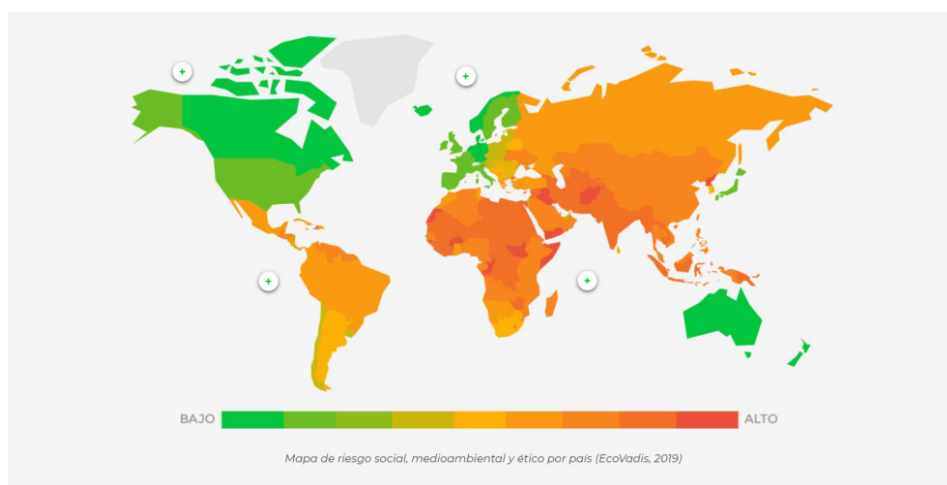
In the organisation, we have tools for identifying risks as well as opportunities for improvement both outside and inside the organisation, such as the SMMS described in the previous section, which is allowing us to give rigour, order and clarity to long, medium and short-term strategies.

ESCENARIO ACTUAL	
MOVILIDAD	Pasar del sector de automoción al de movilidad, siguiendo las tendencias EASCY (Eléctrico, Autónomo, Compartido, Conectado, Actualizado anualmente)
SOSTENIBILIDAD	En su triple dimensión (medioambiental, sociedad, gobernanza)
EFICIENCIA	Excelencia operacional para cumplir con los requisitos de los clientes
TALENTO	Desarrollo de personas para adaptación a un nuevo entorno
CONCENTRACIÓN DE CLIENTES	Menos players, operaciones societarias en OEMs
GEOPOLÍTICA	Guerras comerciales, tensión arancelaria,...
CADENA DE SUMINISTRO	De la "Globalización" a la "Glocalización", crisis de los semiconductores, incremento precio materias primas,...

We are currently facing a VUCA world, where flexibility, dimensioning and technological skills play an important role. During these years, moreover, the relational model with vehicle manufacturers has undergone major changes to which we have had to adapt, and which has led to the adoption of advanced management models. In this sense, and as in our specific case, innovation, deployed in all areas of the organisation, is allowing us to adapt to the new scenarios that are presented to us. Today, it is more necessary than ever to have a defined and shared strategy and positioning that allows us to adapt to this environment and thus ensure our sustainability. And this is undoubtedly about digitalisation, efficiency and competitiveness.

Such a volatile environment leads us to identify the determining factors of the evolution of the market and the companies participating in it, and, subsequently, the BATZ Group in coming years, and integrate them into our management and strategy. The impact of those macro-trends on our businesses also has an effect on the repercussions the BATZ Group has on its entire ecosystem.

The picture below shows the map of social, environmental and ethical risks by country in our sector.



Along those lines, looking at the regions where we have business activities and the degree of relevance of the issues for our companies, on the following table we have itemised the issues that are a high priority for BATZ and how we are responding in the short to medium term.

PRIORITIES	INITIATIVES
<p>ETHICS AND GOVERNANCE</p> <p>» Decision making and specific actions related with social and individual values and standards compliance.</p>	<p>» Adapting ASG policies and the code of conduct that contain updated rules and procedures that regulate responsible behaviour for everyone who is part of BATZ, including suppliers, associated people and clients. Likewise, the framework that guarantees the effective protection of information is included, providing added value in all processes and ensuring the security, reliability and stability of systems. See sections II, VII and VIII of the report.</p>
<p>PRODUCTS AND SERVICES</p> <p>» Strengthen the value proposition characterised by being competitive, flexible, versatile and innovative.</p>	<p>» Management with a clear multi-product, multi-technology and multi-client orientation, designing and developing products and processes in an efficient client oriented way. All of that should be based on a clear commitment to innovation and operational efficiency and data governance that makes it possible for us to align our solutions with current trends in the industry. See the initiatives in section I of the report.</p>
<p>PEOPLE AND SOCIETY</p> <p>» Talent aligned with and motivated by a common project Strengthen the value chain is a sustainable way combining efficiency</p>	<p>Drive cultural transformation towards an agile, efficient and collaborative organisational structure. See the initiatives in section VI of the report.</p> <p>» Develop a chain of strategic suppliers close to us, in response to a paradigm shift that has been accelerated after the COVID-19 crisis, towards a de-globalisation of the value chain, less influenced by geopolitical and economic factors. See the initiatives in section IX of the report.</p>
<p>ENVIRONMENT</p> <p>» Excellence and sustainability of processes and products, minimising their environmental impact.</p>	<p>Promote the rational and sustainable use of resources, including improving energy efficiency and reducing our carbon footprint.</p> <p>» Make plans for lowering greenhouse gas emissions and minimising our waste and make reuse and the circular economy instead of using landfills high priorities. See the initiatives in section V of the report and the description of our commitment to innovation in section I.</p>
<p>ECONOMIC ISSUES</p> <p>» Intelligent growth to reach a suitable size for our market.</p>	<p>» Improve the key financial profile ratios</p>

IV. KEY INDICATORS, KPIs

No. 5 - Traceability table in compliance with the Non-Financial Information and Diversity law

4.1 KPIs

This report has been elaborated in accordance with the GRI Standards and provides a comprehensive and balanced picture of our organisation's material issues and related impacts, as well as the management thereof.

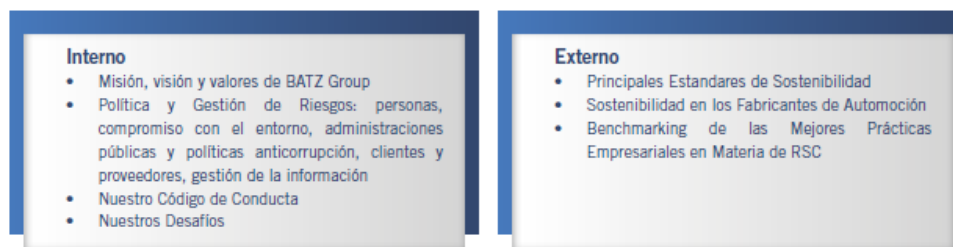
4.2 MATERIALITY ANALYSIS

The BATZ Group is guided by transparent and sustainable management principles, taking into account the factors relevant to achieving an organisation that is sustainable in the long term and the interests of the primary stakeholders and that identifies and main economic, social and environmental impacts.

Sustainability in the BATZ Group is based on ensuring that the needs of stakeholders are met, while the business develops and generates value, through the following action framework:

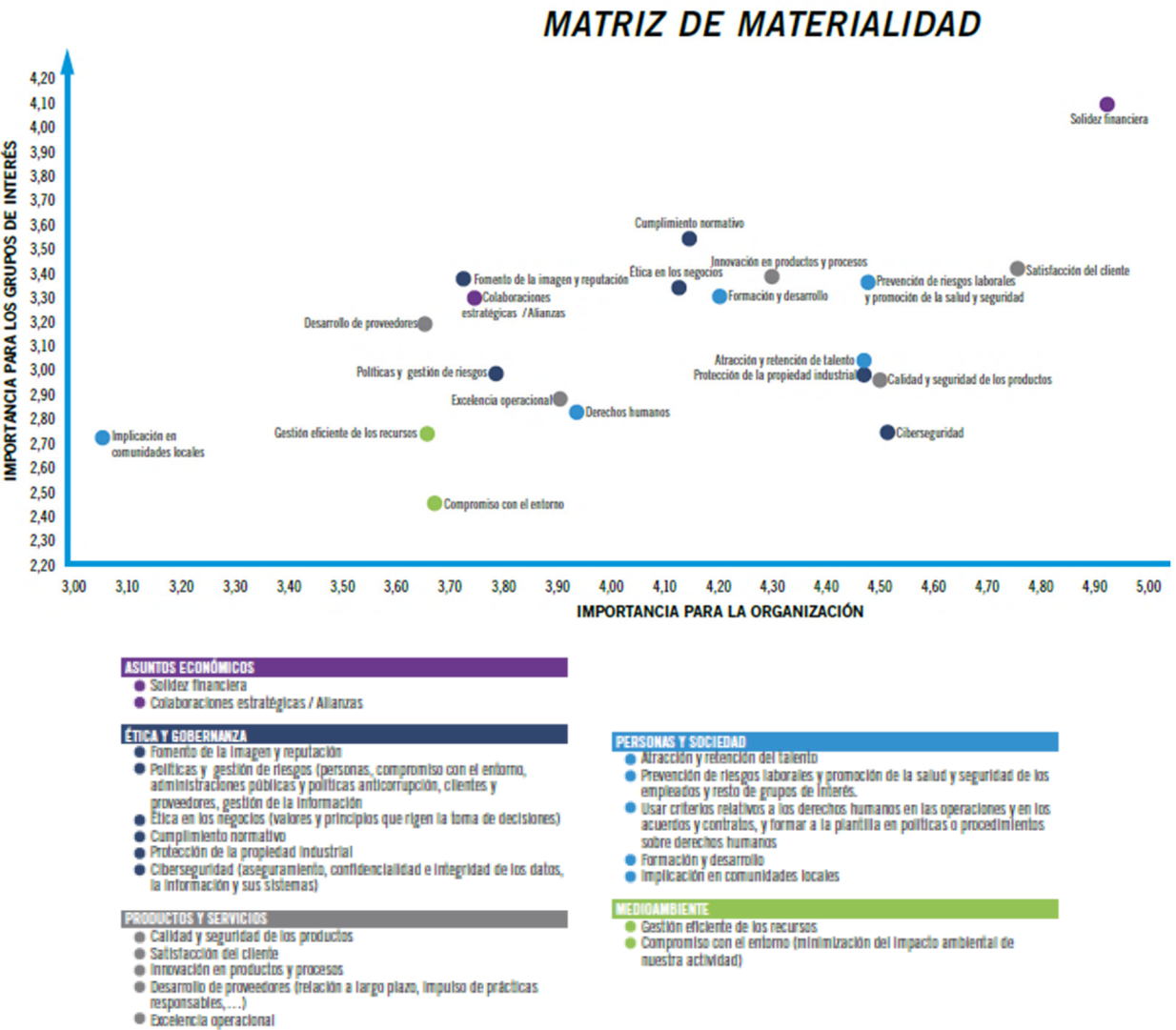


El Marco de actuación de la sostenibilidad de BATZ Group se fundamenta en los siguientes pilares internos y externos:



We at the BATZ Group have identified the most important material issues, based on impact criteria that take into account the concerns of stakeholders, and those areas that are subject to active management, given their significance for the organisation.

In accordance with these criteria, a set of material impacts have been identified which have been evaluated and prioritized according to their importance for stakeholders and the business, as shown below.



4.3 OUR STAKEHOLDERS

Our mission is clear, we are here to contribute to the success of our clients while participating in the socio-economic development of our environment. socio-economic development of our environment. And this can only be done through trust, integrity, cooperation and transparency. and transparency. Therefore, taking care of and strengthening the relationships we maintain with our stakeholders is key for us.

To this end, we have official communication channels through which we can establish a dialogue and thus meet the expectations of our stakeholders.

GRUPOS DE INTERÉS					
INTERNA		EXTERNA			
NUESTRAS PERSONAS	ÓRGANOS SOCIALES	CLIENTES	PROVEEDORES	SOCIEDAD ¹	ADMINISTRACIONES E INSTITUCIONES ²
Cánales de comunicación propios de la Cooperativa	Cánales de comunicación propios de la Cooperativa	Web	Web	Web	Web
Intranet	Intranet	Contacto directo	Extranet	Redes sociales	Redes sociales
Newsletter	Newsletter	Tech days	Reuniones	Entrevistas y artículos en prensa	Entrevistas y artículos en prensa
Reuniones	Reuniones	Ferias y eventos	Redes sociales	Reuniones	Reuniones
Tablones	Tablones	Redes sociales	Visitas a nuestras instalaciones	Jornadas, ferias y eventos	Jornadas, ferias y eventos
Pantallas	Pantallas	Visitas a nuestras instalaciones		Visitas a nuestras instalaciones	Visitas a nuestras instalaciones
Canal ético	Canal ético	Informes		Informes	Informes
Encuestas de satisfacción	Encuestas de satisfacción	Catálogos			
Plan de acogida	Plan de acogida				

¹ Engloba sociedad civil, Mondragon, asociaciones, entidades locales, ONGs, universidades, centros de formación, centros tecnológicos,...

² Engloba Mondragon, administraciones públicas, entidades financieras, organismos reguladores, organismos públicos de financiación...

V. ENVIRONMENTAL ISSUES

No. 6 - Traceability table in compliance with the Non-Financial Information and Diversity law

The BATZ Group declares its **ambition to contribute to a better world and provide global, innovative and sustainable mobility solutions**. To those ends, the management takes on the commitment to provide the means and resources needed to achieve that goal and to motivate and involve all interested parties in the initiatives to achieve the goals.

We are committed to excellence and sustainability in our processes and **minimising their environmental impact**, taking every plant's characteristics into consideration. We would like to mention that we have implemented and certified an environmental management system based on the **ISO-14001** standard at the BATZ Group plants to provide all the human and material resources needed to prevent and minimise environmental risks.

We rely on continuous improvement as a reference framework for setting goals that prevent pollution and improve our environmental performance.

Our Commitments



We will comply with the **legal requirements** and other requirements we set for ourself, correcting any abnormalities that may arise.



We promote the **rational and sustainable use of resources**, including **improvements in energy efficiency and reducing our carbon footprint**.



We evaluate the chemical substances we use and set criteria for using them responsibly and **lowering our emissions of greenhouse gasses**.



We make plans to **minimise waste**, making **reuse** and the **circular economy** instead of landfills a high priority.



We will guide our **supply chain** and show the importance of reducing the environmental impact it causes.

This policy is communicated internally and it is available to all the organisation's interested parties through internal corporate channels, including the intranet, extranet and externally, and on the BATZ Group website.

Our people; primary agents in environmental issues

It is essential to provide environmental education to our employees, with the aim of training and raising awareness in this area, without losing sight of the "amplifying" role that each person plays in his or her environment. The BATZ Group's sphere of influence extends beyond our production plants. Periodic training is carried out, appropriate to the profile of our employees, adapting environmental training to the needs detected. We have resources adapted to the new technological realities, which allow us to better disseminate our environmental campaigns, such as information pills through the intranet, corporate website, RSS, etc.

Likewise, we pay special attention to the management of emergencies, events which, even though they are punctual and of low probability, require specific actions, planning simulations to evaluate our response capacity. For this reason, we carry out a continuous assessment of environmental aspects, in order to avoid negative impacts before they materialise. We act proportionally based on the principle of prevention. The environmental objectives at BATZ are established with two levels of monitoring: Group objectives and objectives specific to each plant. The first ones have been defined on the basis of GRI standards and must be reported monthly, which allows us to act before a significant deviation could occur.

We maintain environmental financial guarantees within the policies covered by our insurances, which ensures sufficient economic resources to face a possible environmental liability derived from our activity.

And this commitment to our environment goes back a long way. The first environmental policy at BATZ was established in 2001, serving as a framework for implementing a management system based on the international ISO 14001 standard. Two years later, certification was obtained for the Igorre plant, the group's headquarters. We adapted the system at the same time as the standard was renewed, adopting the high-level structure, new risk-based approach and including the life cycle perspective.

Management has made it a requirement to maintain an Environmental Management System (EMS), certified by a third party, at every production plant. New processes, products or expanding facilities are included in the scope of the EMS. We are proud to say that none of our plants has lost its certification since it was obtained.

Our actions in this area are aligned with the Sustainable Development Goals (SDGs) of the 2030 Agenda, they are our basis for understanding how we are impacting our environment and society, and for setting the challenges as an organisation. It is our duty to know how to combine sustainability as a business group with the promotion of the circular economy and the transition to an energy model that reduces the consequences of climate change.

5.1 POLLUTION, OUR ENVIRONMENTAL IMPACT

No. 7 - Traceability table in compliance with the Non-Financial Information and Diversity law

Every organisation generates environmental impacts, which, in our case, we quantify and at the same time develop strategies aimed at avoiding or minimising them. BATZ provides human, economic and material resources to each of its plants, in order to achieve full compliance with environmental legislation and any regulations in this area that may be applicable to us as required by our stakeholders. This philosophy leads us to establish plans prioritising the minimisation of waste and emissions, or to improve our energy sustainability.

ENERGY PERFORMANCE

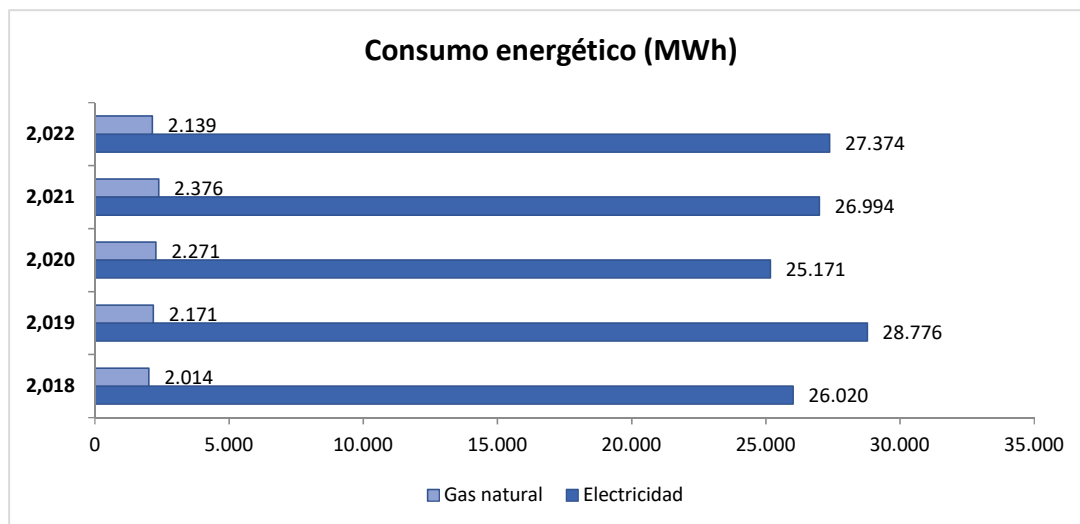
One of the aspects that can most influence industrial organisations is the high energy demand necessary for the development of their productive activities. At the BATZ Group we identify each of our energy sources and report their consumption on a monthly basis.

We have made **energy management** a high priority. Several of our plants have systems that monitor consumption in real time, making it possible to focus on points of high energy demand and take actions that mitigate the derived environmental and economic impacts. All of that data has a high added value.

We use two energy sources: electricity and fossil fuels, primarily natural gas and diesel. We have started to create an energy strategy with every plant based on two premises.

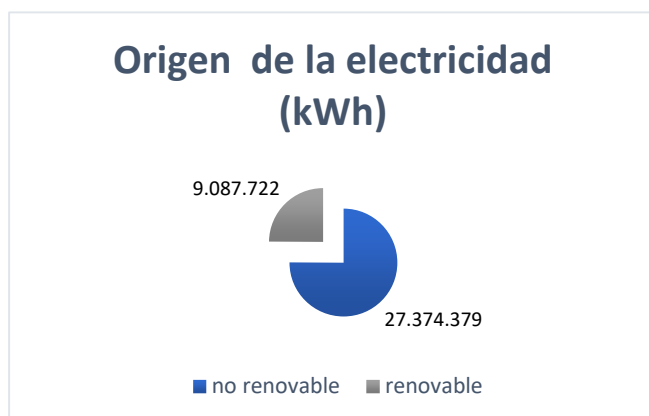
1. The path to consuming electricity from 100% renewable sources
2. Replacing fossil fuels whenever viable and reducing their use when there is no existing technology that is technically and economically viable

The distribution of energy consumed is shown in the following diagram:



Natural gas is used to maintain the thermal comfort of our workers, exclusively for heating, being the energy source of choice in three of our plants. A decrease in consumption relative to previous years can be seen. Nevertheless, actions have been performed to contain consumption, like installing enclosures between the merchandise loading and unloading areas and production areas. The 2139 MWh consumed is a total of 9.97% less than the previous year's consumption.

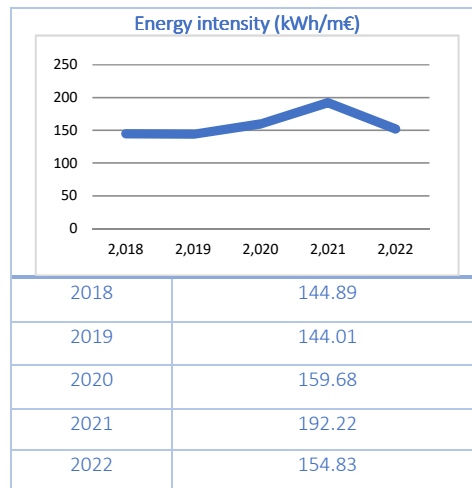
The **rest of the fossil fuels** are primarily for the fleet of vehicles, either to move loads in our plants (forklift trucks) or those provided by the company for personal use. Even though we maintain facilities like generators for electricity for emergencies and pumping systems in fire protection facilities that use fuel, they have not consumed more than the minimum necessary for maintenance. The total consumption was 25,762 L of diesel.



With 27,374 MWh consumed, the main energy source is **electricity**. Analysing the ratio of electricity consumed by hours of direct labour, we have had an increase of 10% from the previous year.

Insofar as the electricity consumed in our plants, we can confirm that at least 9,087 MWh was produced using renewable energy. Knowing that the real figure is higher, but it is not shown because the data is impossible to verify, we can point out that the trend is positive and aligned with what is desirable for our clients and for society.

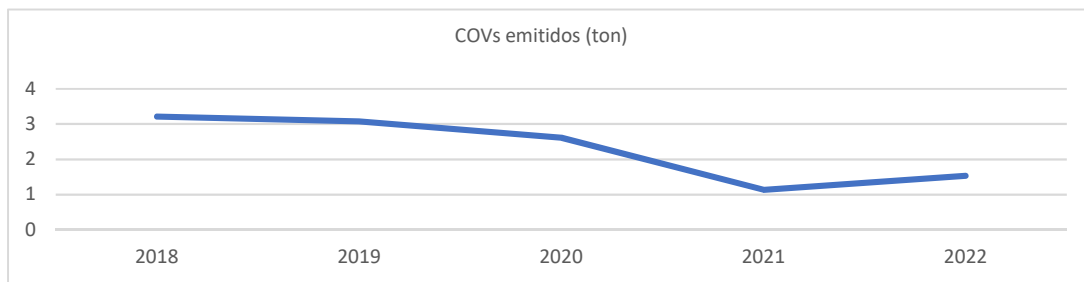
In 2020 **energy intensity** was included in every plant's monthly report for the first time. This indicator provides us with information on energy efficiency based on the economy of each production centre. The improvement of that indicator was brought about through the Energy Efficiency Improvement Plans, maintaining mature lines of work, such as replacing conventional lighting technology with LEDs, audits of compressed air circuits to eliminate leaks, and programming systems to be switched off when they are not needed, etc.



ATMOSPHERIC EMISSIONS

Our primary **atmospheric pollutants** are grouped into two main blocks. They come from processes like welding and machining, associated with pollutants like CO, NOx and particles. And ones deriving from using chemical substances, like volatile organic compounds (VOCs). In our processes, the most significant polluting emissions are VOCs. For that reason several plants have started to include a priority for chemical products with low or null VOC emissions in their purchasing criteria. These substances are not only harmful to human health, but also have adverse effects on natural ecosystems, influencing the photosynthetic activity and metabolism of organisms, and are precursors of photochemical smog.

In recent years we can see how the trend involves a very significant reduction, even though there was an increase this year.



Each plant controls its atmospheric emissions and complies with the emission limits imposed by the legislation in force in each country. All our plants report 100% compliance in this respect.

Furthermore, the levels of **environmental acoustic pressure** are periodically monitored with independent measurements and reports by accredited bodies. We can confirm that in 2022 the reports submitted by the plants have been considered satisfactory.

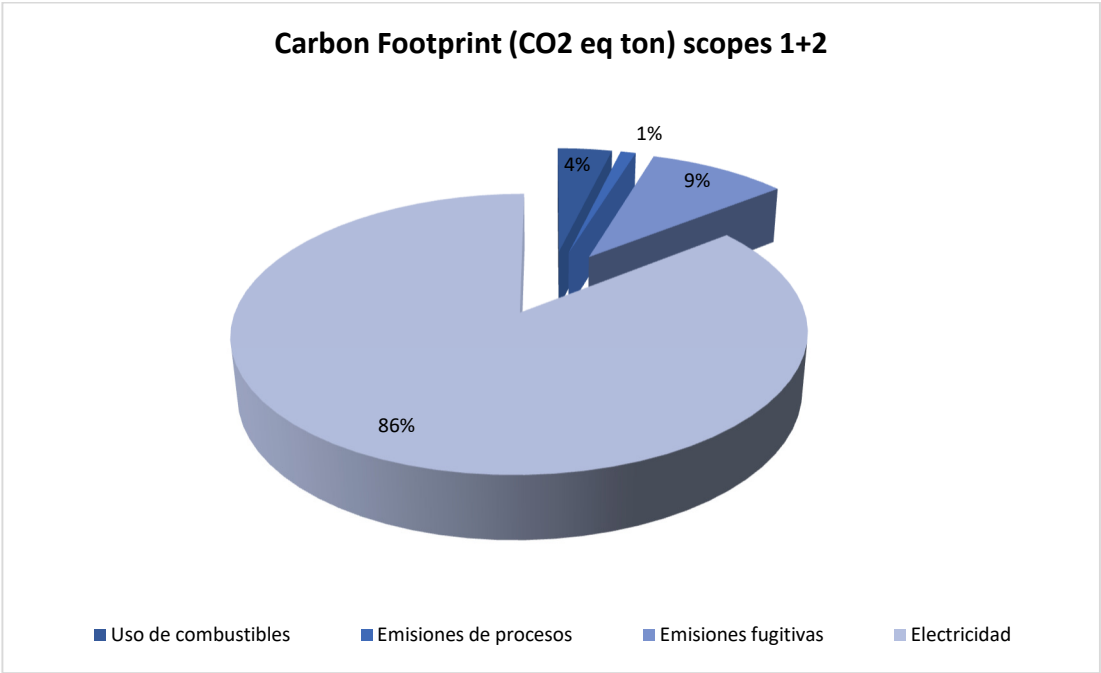
CARBON FOOTPRINT

The BATZ Group integrates sustainability into its strategy and remains aligned with the SDGs. It is therefore embarking on the path to increase its understanding of its own carbon footprint, reflecting, among other things, on the impact of its energy consumption. This is the first step towards the future decarbonisation of the organisation and the successful management of our impact.

To calculate our greenhouse gas emissions, we use the methodology described in the GHG protocol. In 2021, we implemented the calculation of our corporate carbon footprint using an ad hoc tool that made verification by third parties possible. The qualitative leap happens when determining the need to calculate other indirect emissions other than ones caused by electricity consumption.

The data derived from scopes 1 and 2 are presented in this report. Scope one is for fuel use and fugitive emissions or emissions from processes (cooling gases and using extinguishers). And scope two is for electricity.

GHG Category		CO2 eq ton
1.1	stationary combustion	396.17
1.2	mobile combustion	14.56
1.3	Direct emissions from industrial processes	115.32
1.4	Fugitive emissions from releasing GHG	1,046.02
2.1	Indirect emissions caused by electricity	9,350.59



The improvement in the calculation tool revealed that the values presented in previous years were underestimated so, consequently, they will be recalculated. In the future BATZ climate strategy, 2021 will be re-established as the base year.

The analysis of our impact derived from the carbon footprint has been linked with the analysis of our environmental footprint (see chapter 5.2 the circular economy).

5.2 THE CIRCULAR ECONOMY AND WASTE PREVENTION AND MANAGEMENT

No. 8 - Traceability table in compliance with the Non-Financial Information and Diversity law

Sustainability as a strategy involves promoting the circular economy at the BATZ Group. According to this production model, we must reduce the input of virgin materials, minimise the production of waste and extend the life cycle of products.

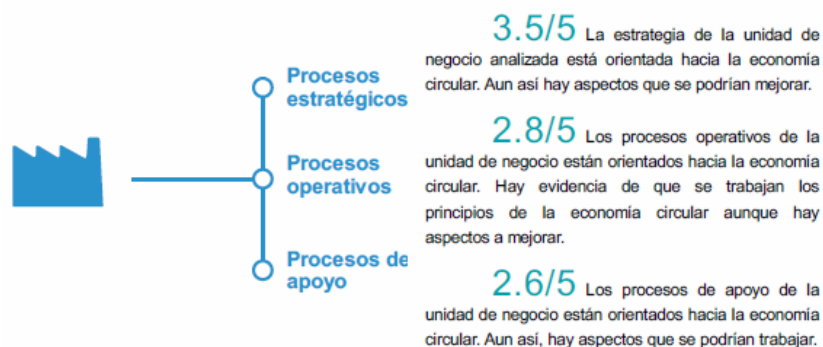
For years, we have been promoting savings in raw materials right from the design phase of our products. We implement technologies that reduce the use of resources, such as WIT or MuCell® injection moulding, and we incorporate recycled plastic materials into our processes and are able to reuse our own plastic.

For the first time we have carried out a **circular economy diagnosis** for our serial production business. It was done using a participative process with representatives from all the affected areas: engineering, logistics, purchasing, environment, innovation, marketing and communication, among others.



CircularTRANS Diagnostic Model, source: Mondragon Unibertsitatea

The evaluation of our context produced the following results.



The analysis led us to identify the following opportunities for improvement.

- To **increase circular inputs** and **lower the impact of materials**
 - Increase % of recycled steel
 - Use recycled plastic
 - Evaluate the use of biopolymers
- To **lower the energy impact**
 - Replace the current electricity with electricity from renewable sources
- To **lower the impact of transport**
 - Alternative propulsion systems

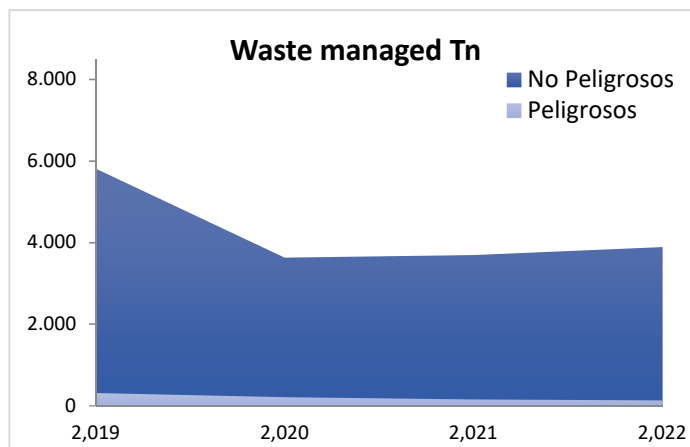
WASTE MANAGEMENT

The metallic materials used are themselves 100% recyclable, once they are considered to be waste in our plants, they are sent to waste managers who melt them down again and put them on the market.

We continued with the composting programme at our centres in the Basque Country, so that the organic material from food waste, cups and vending service containers is used to make compost.

Landfill is the last option, prioritising any form of reuse or recycling.

After years of establishing policies to minimise the generation of different types of waste, you can see how the total volume managed is similar to the previous year despite an increase in production. It can be itemised as follows.



Group Waste Tn	2,017	2,018	2,019	2020	2021	2022
Non-hazardous	5,183	6,916	5,811	3,630	3,687	3,890
Hazardous	403	408	311	207	150	128
TOTAL	5,586	7,324	6,122	3,838	3,837	4,018

The data shows a continuous drop in the weight managed since 2018. Its characteristics make hazardous waste notable. It is now 68.63% less than in 2018. Non-hazardous waste has remained at around the same values as the previous year, however it is a little higher.

An indicator is established with a monthly report for each plant, based on the amount of hazardous waste generated per hours of work carried out by direct labour workers. This data is valuable for quantifying this type of waste more reliably, as it is mainly generated in the workshops.

$$RP = \frac{\Sigma \text{hazardous waste managed kg(kg)}}{\Sigma \text{hours worked MOD(h)}}$$

2,018	2,019	2020	2021	2022
0.11	0.10	0.26	0.06	0.04

Similar to previous years, the highest volume of hazardous waste is oily waste, followed by impregnated solids, dirty washing water from workshop cleaning and, lastly, packaging that has contained chemical products. The Non-hazardous waste is mostly metal, because it is calculated by the weight generated.

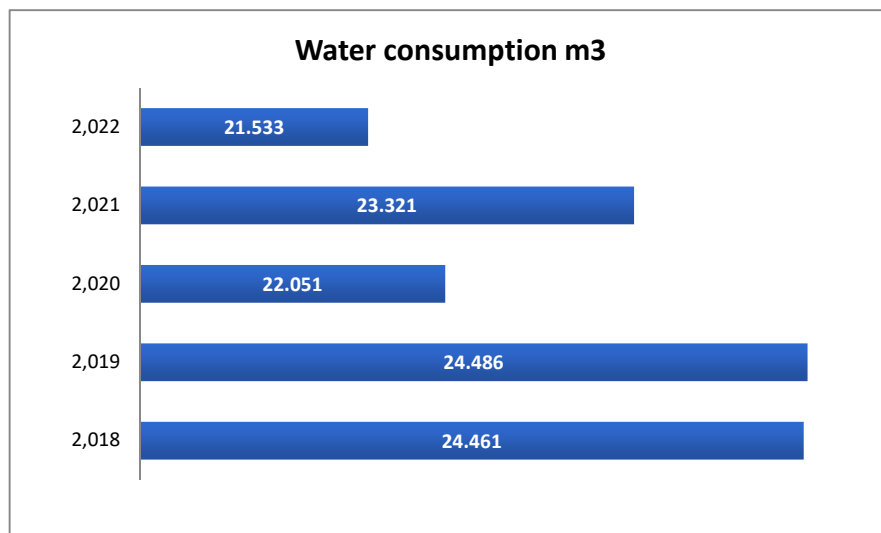
5.3 SUSTAINABLE USE OF RESOURCES

No. 9 - Traceability table in compliance with the Non-Financial Information and Diversity law

WATER CONSUMPTION

At BATZ, there are three processes responsible for the water consumption: the cooling circuits in the production areas, the consumption in the areas dedicated to personal hygiene and drinking fountains, and the consumption for cleaning.

We currently have the most efficient cooling systems in place for each plant, transferring the experience of adiabatic coolers from one to another. Also included are actions to reduce water consumption in the bathrooms, including push-action taps with automatic shut-off, aerators to reduce the flow while maintaining the feeling of pressure, dual-flush toilet cisterns, circuit checks for leaks, etc.



The total water consumption in 2022 was 21,533m3, which is 7.7% less than the previous year. The water is supplied entirely by external networks. We are still committed to responsible water management at the BATZ plants and processes for reuse have been implemented in some cases.

Aware that a significant proportion of water is consumed by our workforce, we do monthly reports on an indicator of consumption in relation to the number of employees. The results show that for the first time since we started reporting, water consumption is a significant issue. It has increased to 2.56, with 1.77 being the value for 2018.

RAW MATERIALS CONSUMPTION

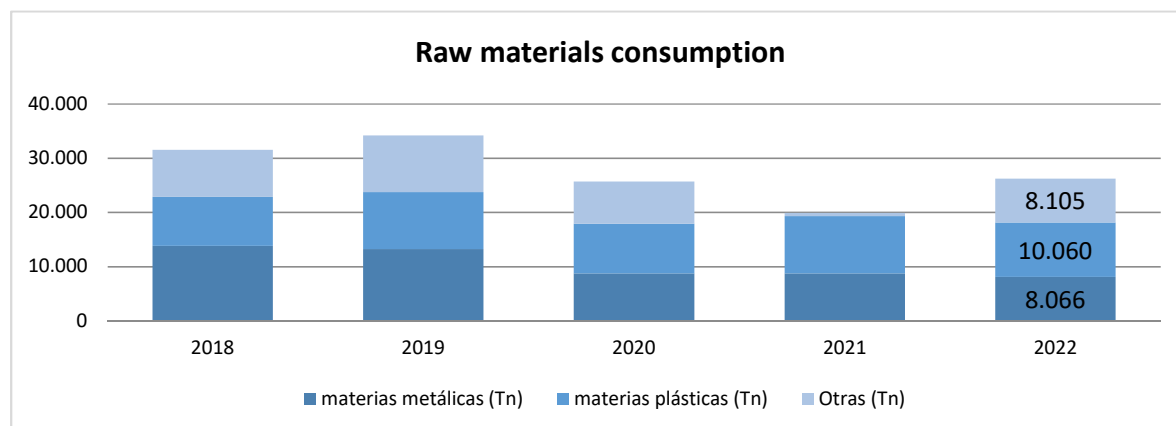
No. 10 - Traceability table in compliance with the Non-Financial Information and Diversity law

At BATZ we have been integrating sustainability into our product portfolio for years. It provides added value to these products in recognising them as being manufactured with a better environmental impact and guaranteeing that they are less harmful to the environment throughout their life cycle. From the sourcing of raw materials, production, marketing and transport to the final management of waste.

Along those lines, reducing raw material consumption at BATZ has been conceived from the concept and design phase of the products that will be manufactured later. In this way, we apply various design concepts focused on achieving the lightening of the various components and we continue to explore and implement alternatives to further improve our processes. In this sense, and as explained in a previous section of this report, our industrial model of operational efficiency is allowing us to optimise resources and, therefore, the consumption of raw materials. This is achieved by increasing production efficiency in all processes through the implementation of the Kaizen management philosophy of continuous improvement in time, space, waste, inventory and faults

Joining forces has represented a reduction of metal materials by .3 % of the weight consumed per hour during production in the plant. In regards to plastic materials, it has not been possible to adjust the processes as much, leading to a growing ratio.

In absolute numbers, we consumed 26,231 tons of raw materials, where 31% is of metal origin (8,066 Tn) and 38% is of plastic origin (10,060 Tn) and the remaining 31% is other materials (8,105 Tn).



Similarly, we have continued to work on improving packaging materials. The implementation of returnable boxes and the standardisation of packaging has managed to minimise the environmental impact.

ENERGY CONSUMPTION

No. 11 - Traceability table in compliance with the Non-Financial Information and Diversity law

See energy performance

In relation to the measures taken in 2022 to improve energy efficiency, it has not been possible to make significant investments. Nevertheless, some actions have been taken in small specific issues. Among the actions taken we can highlight:

- Energy Consumption: Finish completely removing lamps that do not use LED technology
- Energy Consumption: Viability and savings analysis with installing photovoltaic panels. The investment may be made in 2023 in some plants.
- Compressed Air: reduce the working hours of the compressors on weekends and bank holidays and sectioning to block supply to machines that are not running.
- Cooling Water: Filters installed in injectors

5.4. CLIMATE CHANGE

No. 12 - Traceability table in compliance with the Non-Financial Information and Diversity law

Our commitment to more sustainable mobility is reflected in our day-to-day business. From solutions based in weight reduction innovations and active aerodynamics to production processes, we strive for vehicle efficiency. And, consequently, lower energy consumption and emissions, which contribute to improved air quality in cities and minimising the greenhouse effect produced by the vehicle's CO2 emissions.

In 2021, we launched our first mobility diagnosis in the Basque plants and we subsequently created the associated **sustainable and healthy mobility plans**.

We obtained a large response from the collective. They have made it known they would like ride shares and the workers in the area around the plants (less than 15 km) would be willing to use transport like bicycles or electric scooters if we provided the conditions to park them.

It started in our Basque plants. However, actions in other plants have already been implemented, like installing chargers for electric vehicles in the plant in China or distributing checks that can be used in supermarkets in compensation for regularly using a bicycle for travelling in the plant in the Czech Republic.



5.5. BIODIVERSITY PROTECTION

No. 13 - Traceability table in compliance with the Non-Financial Information and Diversity law

The BATZ Group's production plants are located in industrial areas, except for those located near the Gorbea natural park (Biscay), declared a Special Conservation Area by the Basque Government and included in the European Natura 2000 network. Beyond its naturalistic values, this area and its surroundings constitute a reference point with an enormous symbolic and cultural significance for the Basque population in general, and for the population of the surrounding area in particular.

Specifically, the Igorre plant is located in an area of special interest for the protected species *Mustela lutreola* (European mink), as its habitat extends along the banks of the Arratia river and its affluents. For that reason specific requirements have been established that protect the mammal and its habitat. It is complemented by a plan against invasive species, like the *Cortaderia selloana* which has a high presence in the towns in the area.

For the seventh consecutive year, we have collaborated with the environmental education programme AZTERTU, in its IBAIALDE version, in monitoring of the rivers near our locations in Arratia. http://www.euskadi.eus/web01a2inghez/es/contenidos/informacion/ibaialde_anual/es_def/index.shtml



We have analysed the species on the IUCN red list and national conservation lists whose habitats are affected in the area around our plants. Those inventories include plants and animals and they are intended to be used to identify threats to the flora and fauna that need special protection.

	Igorre	Czech Republic	Zamudio	Mexico	Kunshan	Guangzhou
In critical danger	11 Mustela lutreola, Alzoniella onatensis, Lepidochelys kempji, Squatina squatina,	3 Mustela lutreola, anguilla anguilla, hynum fertile	15 Lepidochelys kempji, squatina squatina, Acipenser sturio	1 Campephilus imperialis	4 Yellow Pond Turtle, Baohua Yulan, Chinese Alligator, Isoetes sinensis	25 Chinese Swamp Cypress/ Chinese Three-striped Box Turtle
Under threat (No.)	21 Raja undulata, Laccariopsis mediterranea, balaenoptera musculus	14 Fomitopsis officinalis, Limniscus violaceus, falco cherrug, margaritifera margaritifera	20 Cetorhinus maximus, Austropotamobius pallipes, Neophron pernocterus	7 Xenophorus captivus, Onthophagus aureofuscus, Thamnophis melanogaster	4 Tiger, Ulmus chenmuoi, changnienia amoena	36 Tiger/ Chinese Crocodile Lizard/ Bamboo Leaf Oak
Vulnerable (No.)	65 Pyrgus cirsii, Hygrocybe spadicea, Tricholoma acerbum, Rissa tridactyla	46 Violet coral, Cortinarius odoratus, Tricholoma acerbum, Nehalennia speciosa, Buchwaldoboletus lignicola	71 Pyrgus cirsii, Hygrocybe spadicea, Tricholoma acerbum,	9 Boletinus merulioides, Cedrela odorata, Lepus callotis	11 Japanese Seahorse, Tianmu Mulan, Love Apple, Peking Gecko	57 Japanese Seahorse/ Chinese Agarwood/ Chinese Cobra

Number of species and list of the most relevant

VI. SOCIAL AND EMPLOYEE ISSUES

BATZ is made up of a team of **people committed to the** long-term success of our venture, working each day to achieve this common goal. And in order to do this, we strive to provide a safe and healthy environment where diversity, equal opportunities and the training and development of our people are paramount. In short, a place designed by and for people.

Our people management model

The BATZ Group manages people using a structured model that monitors them from the moment they enter until they leave the organisation, regarding their stay at BATZ as a process of continuous development. We are talking about the Employee Life Cycle (hereinafter ELC).



The ELC model is structured around our strategy and, as a result, around the people management strategies that are established in order to achieve these first strategies which, logically, go hand in hand. The different systems and **processes** for managing people that will be used as a guide throughout their entire professional career are identified and developed based around that nucleus.

Recruitment and selection

One of the pillars of people management at BATZ. But rather than "selection", we like to refer to this process as talent recruitment, basing this process on our competency-based management model. Identifying the profiles needed, or in a more specific way, the technical and transversal skills that are critical for positioning and for the organisation itself, the latter of which are tied to corporate values, will be used to back the recruitment process. Recruitment may be done internally, in the form of internal promotion (mostly described in the next section "*Development*"), or externally by attracting and selecting new candidates.

When it is a matter of attraction and selection, BATZ identifies and manages several channels of communication they can contact their environment through to attract talent.

- We are committed to strengthening relationships with universities or professional centres in a structured and ongoing way. (table of collaborations in the Society section)
- We have relationships with research centres or entities that bring together a lot of knowledge. (table of collaboration in the Society section)
- We participate in several employment fairs (table of collaborations in the Society section)
- We have periodical visits to our facilities by educational centres to promote our organisation and transfer our knowledge to external centres or institutions.
- We make professional opportunities at the BATZ Group visible with online tools like job sites, the corporate website and social networks (Linkedin, MONDRAGON People and others where knowledge is exchanged). (Map of communication defined in the BATZ Group communications policy)

When a person joins the company for the first time, their expectations begin to be met.

This first meeting occurs at the time of the initial reception, which is indispensable as a starting point in the long term relationship that will be nurtured with the person hired. In the greeting, it is necessary to present the project so that the person feels welcome, teaching what BATZ is, the values it works with, how it is committed to developing and managing people, how they can move in the company on a daily basis (administrative aspects) and introducing their position (and the Occupational Risk Prevention topics associated with it) and the main relationship networks in which they will be working every day.

After implementing the new greeting plan model in 2020, 2021 was the year it was consolidated. The modules required for adapting it to the new requirements defined by management systems, like information security, cybersecurity, compliance, environment and the GDPR policy, were updated.

On the other hand, when selection involves moving to another country as part of a professional development and value transfer project, ways of doing things and internal knowledge in the organisation, the company has an international mobility policy that defines the generic framework of the conditions for moving abroad, aspects of coverage in the destination and how the return to the home country should be managed and other issues.

Development

Once a person becomes part of the BATZ dynamic, we take care of his or her development. We give recognition and incentives for effort, commitment and hard work through strengthening internal promotion as the main path for professional development, equal opportunities and using a model of professions. In addition, every year we work on creating training plans for people's personal and professional growth by identifying not just technical actions, but also actions that support and foster development in transversal areas (there is more information about the issue in the "Training" item).

Job descriptions are necessary to complete the process. The project to create them is already consolidated at the group level. And they make it possible to identify the soft skills and technical skills required to best perform every job. They are also an important ally not just in the hiring process, but also for defining development activities for our people.

Commitment and retention

For the success of any project it is fundamental that the person feels appreciated and recognised within the organisation. They must also feel like they are part of the project, that the strategic goals are their own and they must be aware of the impact of their contributions on the project.

To those ends, BATZ has defined several internal practices and policies that intend to work like a positive lever for those purposes. Some of them are shown below.

- Career curves are identified (in the sense of both horizontal and vertical mobility).
- Structured social benefit systems are established.
- Policies are defined that allow the reconciliation of family and professional life.
- Organisational models are improved to favour the development of people's skills and person-job adaptation.
- Internal communication processes are addressed, which are very important to achieving people's commitment.
- In the management of people diversity and gender equality is encouraged and appreciated.
- Work is done continuously to guarantee safety, protection and risk prevention for our people.

All policies and their description are available in item 2, Policies.

Leaving the organisation

As well as being welcomed, at BATZ we consider it vitally important to manage the departure from our organisation. Regardless of the reason for a departure, we are aware of the dedication, time and effort in making our business grow. And to those ends, we understand we should make the transition easier and prepare the organisation for managing the process. Specifically:

- This departure may be due to retirement or early retirement (which may involve specific retirement plans and the management of administrative processes to support their entry into this new situation).
- It might also be a departure from the organisation that involves helping the worker by setting up various outplacement processes.

In any case, whenever a person leaves the organisation sets the corresponding succession plans in motion in an effort to make the transition as agile and trouble free as possible.

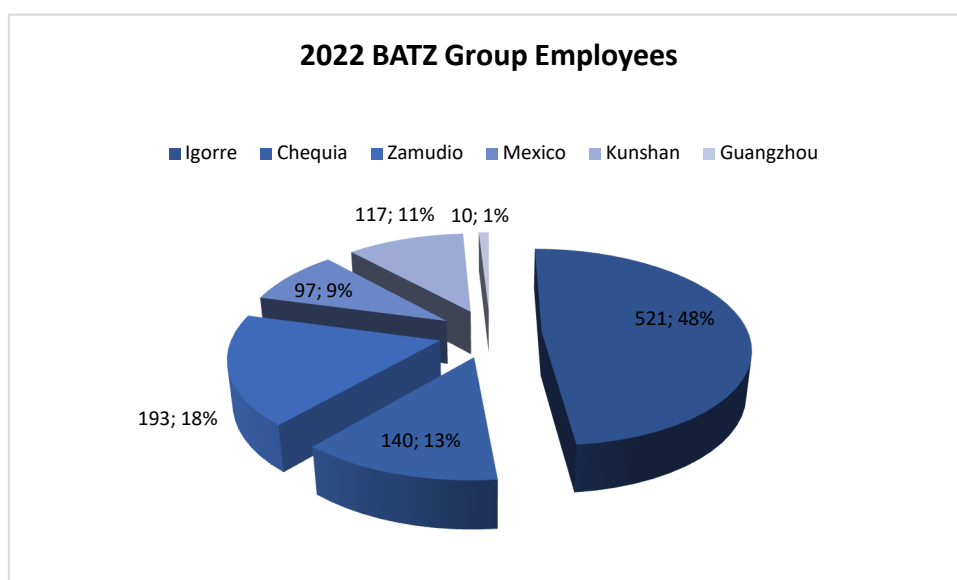
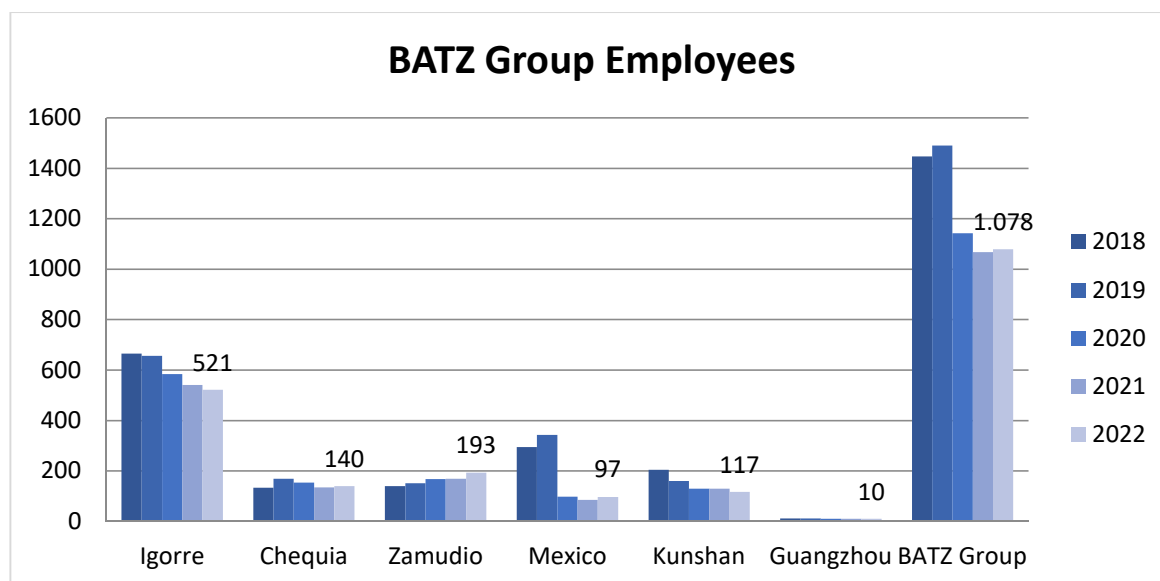
At BATZ we hold events and celebrations aimed at stimulating the feeling of belonging and building professional relationships between all BATZ members.

6.1 EMPLOYMENT

No. 14 - Traceability table in compliance with the Non-Financial Information and Diversity law

The variability of the market and, more specifically our sector, combined with issues like the impact of supply chain limitations and our responsibility to ensure the safety and well-being of our people, has affected employment for us at a group level. In any case, the new paradigm we find ourselves immersed in has not stopped us from maintaining our commitment to employment as one of the key pillars of our business activities (77% of hiring is permanent).

In the charts below, the evolution of the staff mentioned above is described including the percentage of distribution of the staff at the close of 2022 at each plant. And you can see our commitment to employment stability through permanent work contracts in light of the staff variations we have been able to undergo in the volatile scenario the sector is currently going through.



Number of employees by gender (as of 31 December)	2022	2021
Women	242	261
Men	836	808
Total	1,078	1,069

Number and percentage of employees by professional category and age group (as of 31 December)	2022	2021
Rest MOD		
Under 30	57	37
Between 30 and 50	355	367
Over 50	124	91
Rest MOI		
Under 30	36	31
Between 30 and 50	275	343
Over 50	114	78
Middle Management		
Under 30	4	4
Between 30 and 50	50	51
Over 50	15	17
Managerial Positions		
Under 30	0	0
Between 30 and 50	34	38
Over 50	14	12

Number and percentage of employees by professional category and gender (as of 31 December)	2022	2021
Rest MOD		
Women	103	96
Men	433	399
Rest MOI		
Women	112	134
Men	313	318
Middle Management		
Women	15	16
Men	54	56
Managerial Positions		
Women	12	15
Men	36	35

Total number and distribution of contract modalities (as of 31 December)		2022	2021
Permanent			
Contracts		838	823
Temporary		240	246
Full			
Time		1,047	1,040
Part		31	29

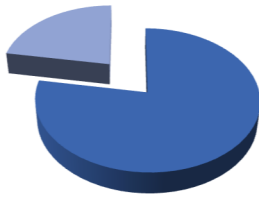
Total number of permanent contracts		2022	2021
By sex			
Women		146	154
Men		690	669
By age group			
Under 30		46	48
Between 30 and 50		538	584
Over 50		255	191
By professional classification			
Rest MOD		411	387
Rest MOI		327	332
Middle Management		59	65
Managerial Positions		40	39

Total number of temporary contracts		2022	2021
By sex			
Women		95	107
Men		146	139
By age group			
Under 30		53	24
Between 30 and 50		176	215
Over 50		12	7
By professional classification			
Rest MOD		125	140
Rest MOI		98	87
Middle Management		10	8
Managerial Positions		8	11

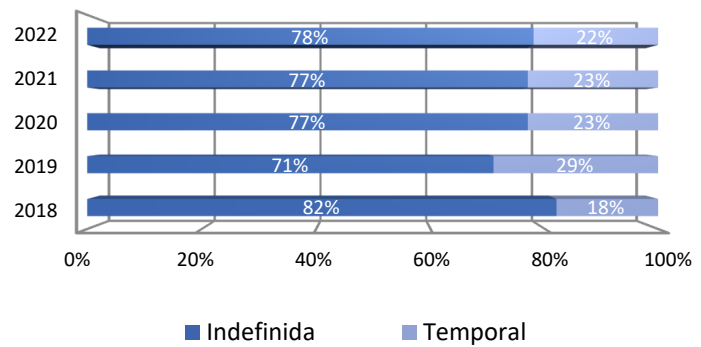
Total number of part-time contracts		2022	2021
By sex			
Women		18	18
Men		13	11
By age group			
Under 30		1	0
Between 30 and 50		27	27
Over 50		3	2
By professional classification			
Rest MOD		6	11
Rest MOI		21	13
Middle Management		3	4
Managerial Positions		1	1

BATZ Group 2022 Hiring

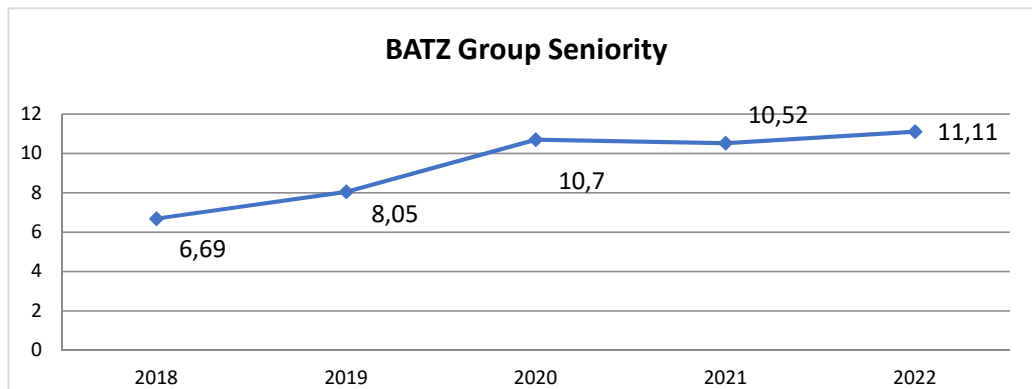
■ Indefinida ■ Temporal



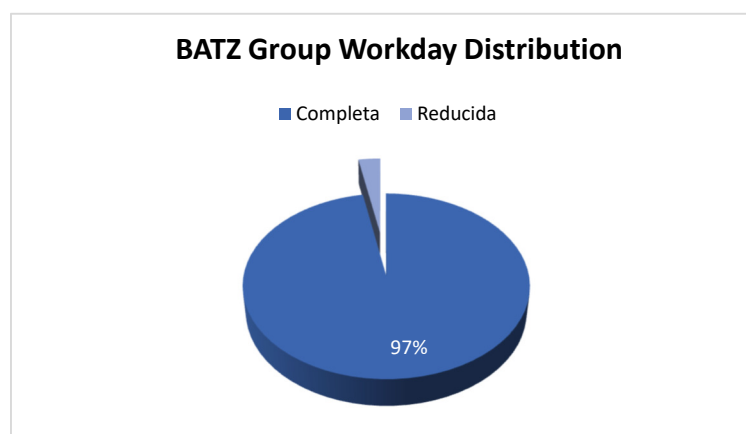
BATZ Group Hiring Typology



Likewise, the positive evolution of indicators like employee seniority in our organisation at a group level should be noted. Seniority indirectly reflects the employment stability mentioned previously and is staying inside the trend of 11.11 years at the close of 2021 and it is in line with the indicator at the close of the previous year.



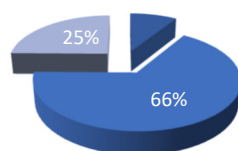
Insofar as the distribution of them collective depending on the kind of workday, 2022 was the first year for which data has been obtained. According to the data 97% of the collective works full time in contrast to 3% who work reduced hours, in a global group level workforce with an average age of 42.89.



Insofar as the distribution of staff by age range and professional category, as indicated in the charts below and following the trend of recent years, the largest percentage of the collective at the group level fluctuates between 30 and 50. And the MOD and MOI collectives account for the largest percentage of the total staff at the close of 2022.

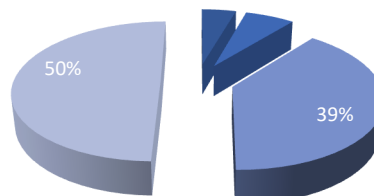
BATZ Group 2022 Employee Distribution by Age

■ <30 ■ 30-50 ■ >50



BATZ Group 2022 Employee Distribution by Professional Category

■ Altos directivos ■ Mandos intermedios ■ Resto MOI ■ Resto MOD



(*) The data analysed for staff are from the close of the year.

No. 17 - Traceability table in compliance with the Non-Financial Information and Diversity law

As indicated above, even though the volatility and situation of the market and the impact of external variables has meant we have had to adapt our organisation to the new scenario we must face, that has not involved backing out of our commitment to issues like keeping up stable hiring, making the average seniority at a group level stay in line with the previous year.

Insofar as turn over, specifically in the scenario we are in where retaining, recruiting and attracting talent has become one of the key levers in the policies and practices regarding managing people and where labour competition for recruiting talent is becoming tougher and tougher, following this indicator becomes key for ensuring a professional environment where our people are committed to continuity.

The 2022 period ended with an indicator of 9%. With the purpose of defining actions and practices that favour creating a favourable environment for the continuity of our workers, which is key to the sustainability of our organisation, that indicator must be monitored continuously.

Number of terminations	2022	2021
By sex		
Women	72	15
Men	104	27
By age group		
Under 30	23	29
Between 30 and 50	148	12
Over 50	5	1
By professional classification		
Rest MOD	38	
Rest MOI	19	
Middle Management	0	
Managerial Positions	2	

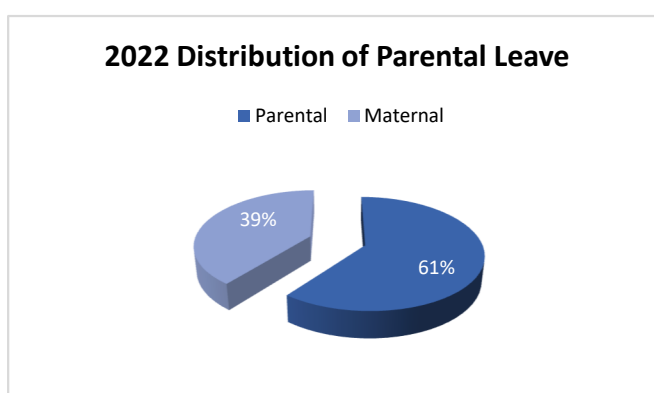
Due to the characteristics of some of the companies in the BATZ Group, two of which are cooperatives, remuneration depends on the cooperative's profits. And because of that, we believe the data that should be used for calculating the aggregate average compensation data is not comparable and does not provide relevant information for the analysis of this item.

6.2 WORK ORGANISATION

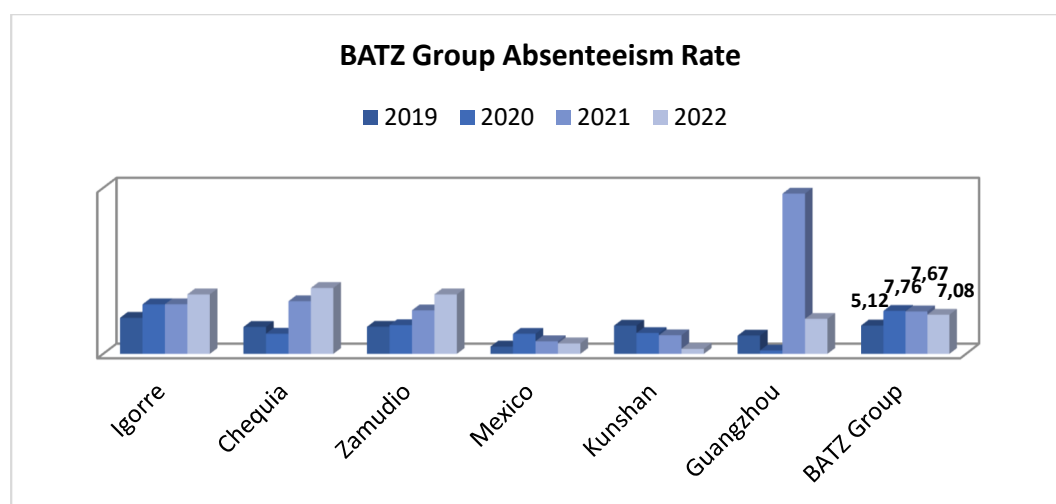
No. 22 - Traceability table in compliance with the Non-Financial Information and Diversity law

Promoting good work-life balance for people is a key milestone to highlight in our organisation's management. Beyond the traditional leaves of absence for maternity or paternity, at BATZ we have tools that promote flexible hours for coming in and leaving work and for meals, management and overtime, holiday pay, reduced schedules in summer and others. All of them are regulated and described in both the overtime policy and the flexible workday policy and the collective bargaining agreements and internal rules for each plant. We would also like to highlight our work-life balance policy, a document that includes mechanisms for leave of absence and reduced working hours. The percentage of employees included in collective bargaining agreements is 100%.

Along those lines, even though it is an indicator about which our capacity of prevalence as an organisation is low, below we will show the group level distribution of parental leave at BATZ, which show that the percentage of people who took that kind of leave in 2022 in our organisation was higher for men.



Likewise, an indispensable part of the analysis of our work organisation starts with monitoring the absenteeism rate. The analysis of the progress of that indicator at a group level shows how the effect of the pandemic is stabilising little by little, with the percentage of absenteeism for 2022 (7.08%) lower than the previous year. There were 1,120 days of lost work from absenteeism.



Formula for the Calculation: % absenteeism = number of NON productive hours / total hours worked (also taking into account leaves of absence, licenses, maternity/paternity leaves...)

No. 20 - Traceability table in compliance with the Non-Financial Information and Diversity law

Although the BATZ Group does not have specific measures regarding the right to disconnect, it is an issue that was especially prevalent during the pandemic period through information pills given the high percentage of people who were working remotely because of the instability and situation that was still present because of COVID-19. The information pills were intended to protect our people's break times in an effort to avoid potential impacts on their work-life balance as much as possible.

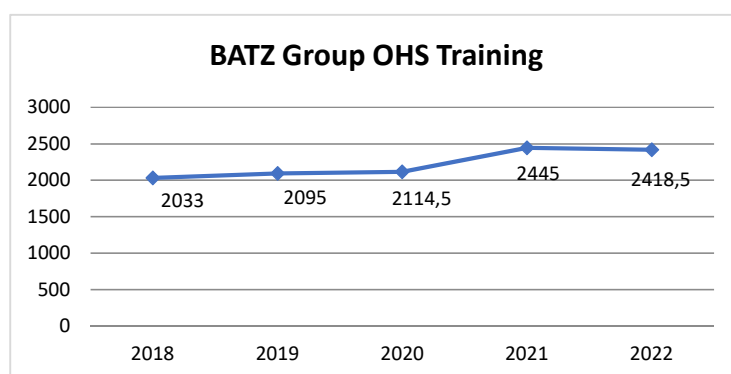
No. 21 - Traceability table in compliance with the Non-Financial Information and Diversity law

The BATZ Group facilitates access to employment for people with disabilities through direct hiring or outsourcing products and services to special employment centres. Our collaboration takes one form or the other depending on the country where we are carrying out our activities. At the end of December 2022 there were two people with disabilities working in the group. Work is often subcontracted to companies of disabled people, like Lantegi Batuak.

6.3 OCCUPATIONAL HEALTH AND SAFETY

No. 23 - Traceability table in compliance with the Non-Financial Information and Diversity law

In 2022, at BATZ we maintained our commitment to training our people in occupational health and safety (hereinafter OHS), because it is seen as a strategic axis for successfully meeting our goals. Consequently, in 2022 we gave a total of 2,418.5 hours of class in the subject, which exceeded the training given in previous years. It was distributed by section in the following way.



In 2018, we made the decision to adapt our OHS certification based on OHSAS 18001 to the new ISO 45001 international standard. At that time, BATZ was one of the first pioneering companies in the Mondragon group to adopt that standard. And in 2021 we renewed the certificate, showing our people and clients that health and safety is a value intrinsic to the DNA of our cooperative.



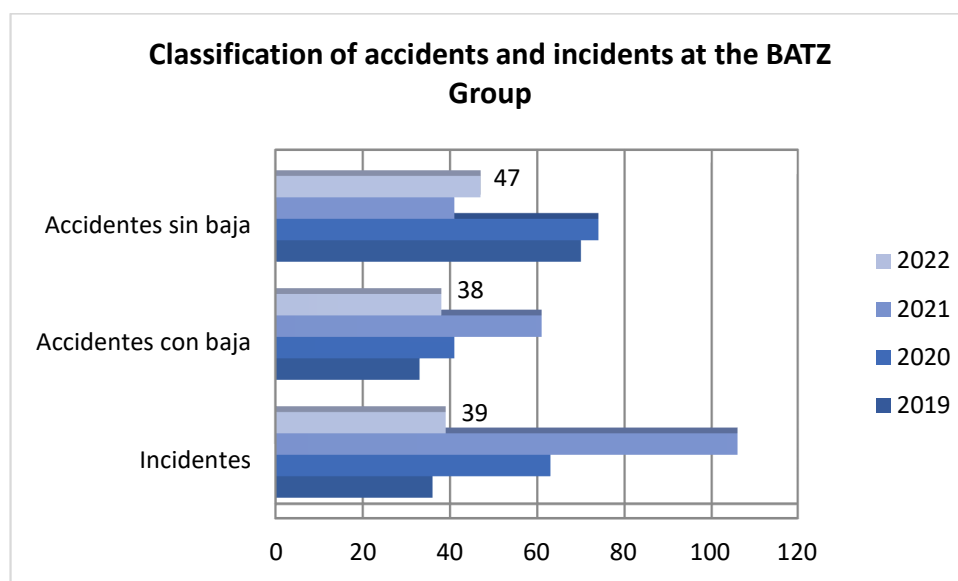
Likewise, as actions to highlight in 2022, we could mention the monitoring of global OHS indicators initiated in 2021 that are common to all the plants. That project was born as an improvement identified in the periodic audits we did alongside other departments and whose goal is to homogenise OHS in all the group's plants, in addition to real integration of OHS into the rest of the areas of the organisation. Consequently, a panel of real time indicators for accidentality was developed.

At BATZ we facilitate and ensure the performance of the tasks and activities of all the people who make up the company in a safe environment, verifying that all prevention, safety and ergonomic requirements are met, and offering the necessary training and methodology for the correct performance of our operations. Along these lines, we have implemented a certified occupational health and safety resource management system and an occupational risk and prevention plan. We also have an occupational health and safety policy that is adapted to each production plant.

We undertake information, consultation and participation actions for workers and their specific representatives in matters of prevention, health and safety. These actions are coordinated through occupational health and safety committees (OHSC) and prevention officers in the plants and, in those where they are not required by law, through external prevention services. Their responsibilities include the planning of preventive activities and the choice of equipment, plant and processes involving the introduction of technologies that generate previously non-existent risks, or that amplify existing ones. The OHSC will report on any other action that may have substantial effects on the safety and health of workers.

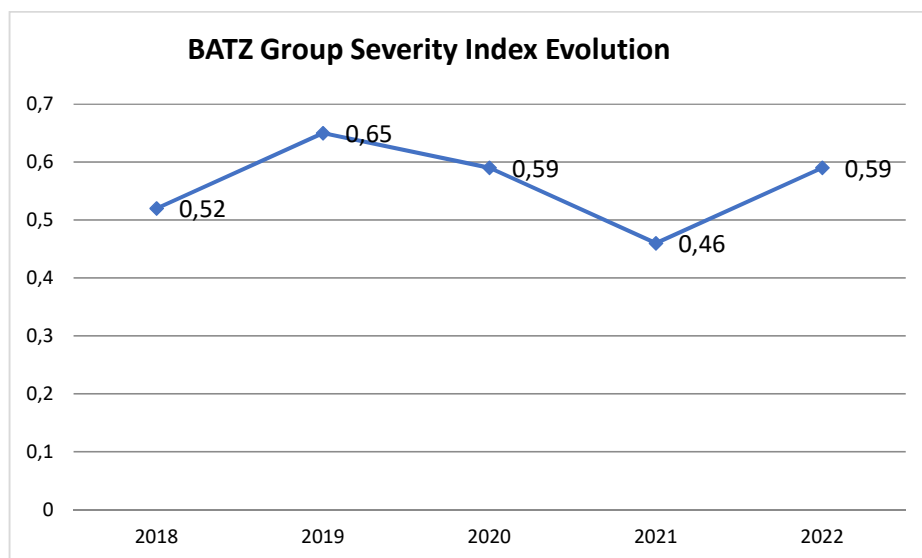
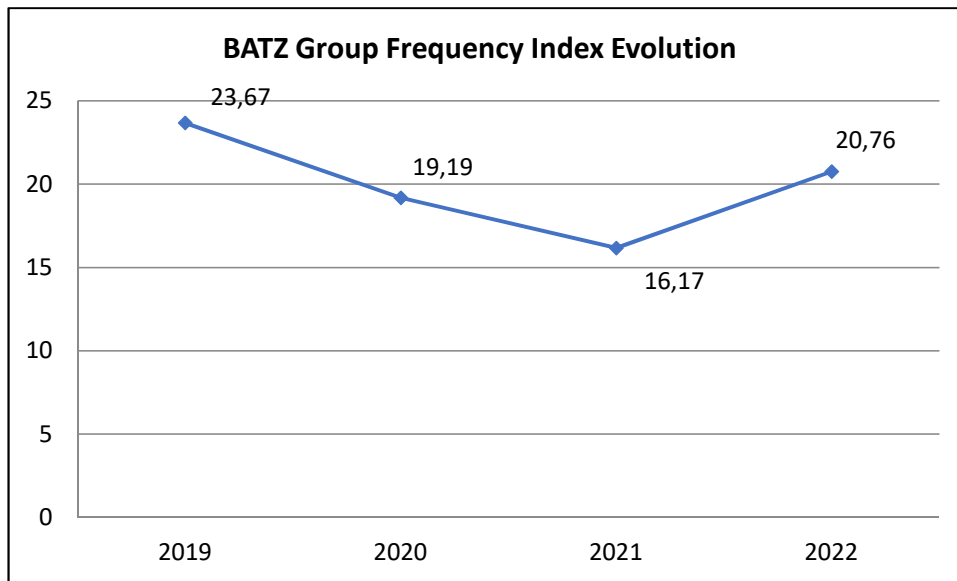
Insofar as the indicators regarding accidentality, a summary chart is included below with the evolution of accidentality by type of event.

Classification of accidents and incidents at the Batz Group



Evolution of the range of indices at the BATZ Group

Below, we show the evolution of the frequency index, in which we can see how there has been a change in the trend in regards to previous years. In regards to days of work lost per accident there has also been a change of trend, with the rate being the same as in 2020.



(*) calculation of indicators

Seriousness index (no. workdays lost/no. hours worked)*10E3

Incident index = (no. accidents en workdays with sick leave / no. employees) x 100,000

Frequency index (no. accidents / no. hours worked)*10E6

We have our own in-house medical and nursing service and agreements with mutual insurance companies and other medical service providers at all our locations. In addition, we periodically promote health campaigns and activities to encourage healthy life-style habits, specifically:

Chronic disease screening campaign, health week, vaccination campaigns (Influenza, TD, hepatitis, reproductive health, first aid), nutrition sessions, anti-smoking campaign, health careers.

6.4 SOCIAL RELATIONS

No. 24 - Traceability table in compliance with the Non-Financial Information and Diversity law

The organisation of social dialogue, including procedures for informing, consulting and negotiating with staff, is defined in accordance with the legislation of each territory. Respect for trade union and labour legislation, non-discrimination policies, compliance with the Code of Conduct, as well as occupational health and safety are all priorities for us.

The channels, objectives and basic contents of internal communication in BATZ, as well as the issuers that must facilitate the galvanisation and effectiveness of BATZ's internal communication processes, are of a global nature for all the Group's companies and subsidiaries. Notwithstanding the above, and given the cultural, organisational and societal differences of the companies in the group, they may choose to approve, in the corresponding bodies, additional channels of communication or locally applied adaptations that, in any case, adhere to the lines defined in the global BATZ Group policy.



100% of our plants comply with the applicable laws in every country. Insofar as the cooperatives, because of their idiosyncrasies we do not have collective bargaining agreements, instead we have internal statutes and regulations that comply with the laws that apply to us and in many cases we improve the law.

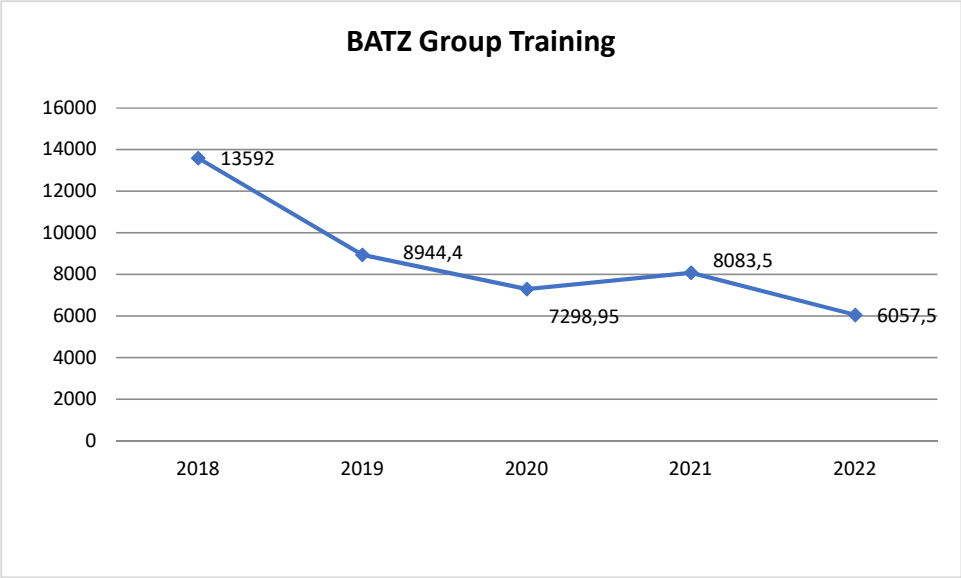
6.5 TRAINING

No. 25 - Traceability table in compliance with the Non-Financial Information and Diversity law

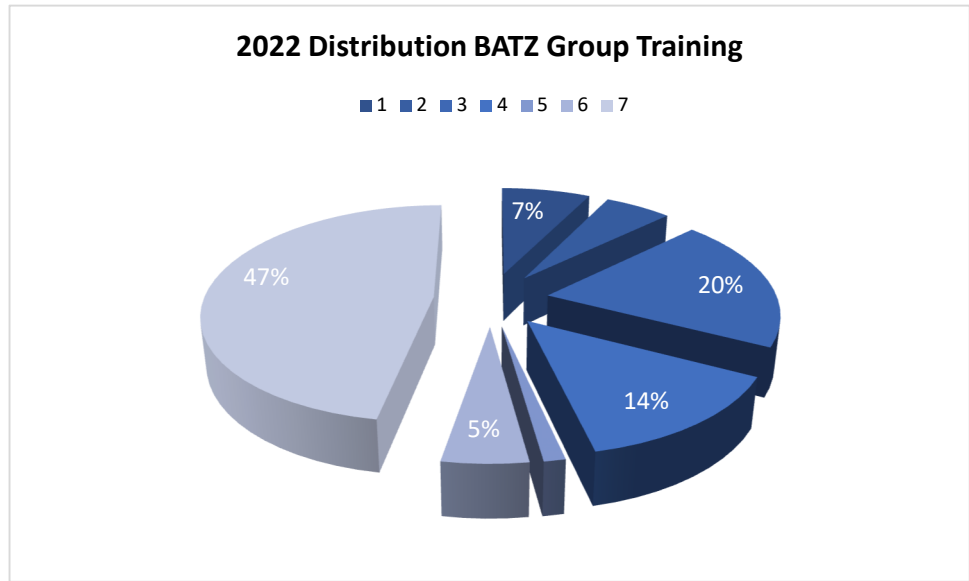
In a dynamic environment like the automotive industry, where management through processes that favour retention has become indispensable, training our professionals is a fundamental axis of our work that lets us adapt to real needs and changes that arise in the market. To those ends, we base ourselves on a system of identifying areas to develop (training and development plans) in the framework of the skills based management model, which spans describing jobs to evaluating people's skills and their subsequent development. Identifying areas to develop that will later be integrated into the training and development plans includes not just actions for developing technical skills, but also transversal ones.

At BATZ we promote training activities that affect the totality of our workforce in languages, corporate and technical skills and management systems, to highlight a few.

On the chart below, you can see that this year the training hours invested saw a significant reduction due to staff adjustments and sales increases and to improve the profit and loss account.



Insofar as the distribution of the training by training areas, below you can find details for the relative weight of each one with, as we mentioned in the occupational health and safety section, accounted for the area with the greatest investment. Likewise, highlighting the increase in training aimed at the area of the environment, it is the period with the most hours used for training in this area in the last four years, despite a decrease in the total number of training hours.



At this time it is not possible to de-aggregate the training information by professional category, but that information will appear in next year's report.

6.6 UNIVERSAL ACCESSIBILITY FOR PEOPLE WITH DISABILITIES

No. 26 - Traceability table in compliance with the Non-Financial Information and Diversity law

There are several lines of work developed by BATZ Group around employability, integration and support for groups with different abilities.

On the one hand, as mentioned above, at BATZ we facilitate access to employment for people with disabilities either through direct hiring or by subcontracting products and services to special employment centres. On the other hand, we collaborate with associations and initiatives to promote social and labour integration, as detailed in the Society section of this report.

6.7 EQUALITY AND DIVERSITY

No. 18 + 19 - Traceability table in compliance with the Non-Financial Information and Diversity law

The BATZ Group is committed to the economic well-being, diversity and development of its employees. For that reason they guarantee compensation transparency between its employees and the absence of gender based salary discrimination. They are working to create effective compensation equality for women and men based on internal promotional policies for hiring and development, as well as applying a model of professions, which is a framework that includes different professions, descriptions of them and their range of compensation.

In that way, the salary gap in 2022 was 4.18% calculated using the ratio of base the base salary and the remuneration of women compared with men, as indicated in the formula shown below.

$$\frac{(M-F)}{M} \times 100\%$$

M Average hourly pay rate male
F Average hourly pay rate male women

If the salary gap is a variable on which we should keep working, not just at an institutional level but at an organisational level, by defining policies and tools that ensure effective equality in this area, it should be highlighted that the BATZ Group indicator is below the current rates in the Basque Autonomous Community (around 17.9%) and nationwide (also around 18.7%).

No. 27 - Traceability table in compliance with the Non-Financial Information and Diversity law

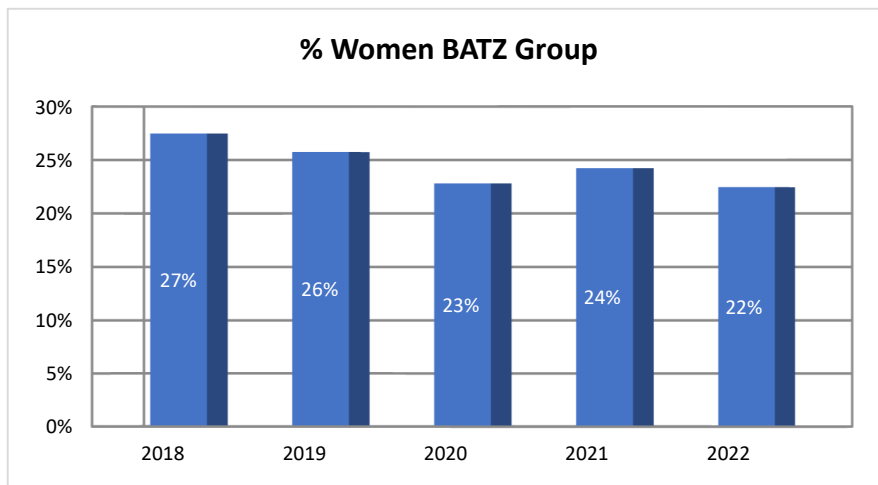
We are a project that was born as a cooperative and currently has a worldwide presence and a multicultural nature. It is a global group, in which there is room for diversity in the people who make up the group. In accordance with the above, and as stated in our Code of Conduct, we expressly undertake not to discriminate on the grounds of race, religion, gender, age, nationality, sexual orientation, gender identity, marital status, disability or any other circumstance that could be a source of discrimination.

We recognise and encourage effort and hard work through internal promotion policies, selection and development policies, work-life balance policies and the application of a career model. We are very aware that promotion is based on merit, ability and individual performance.

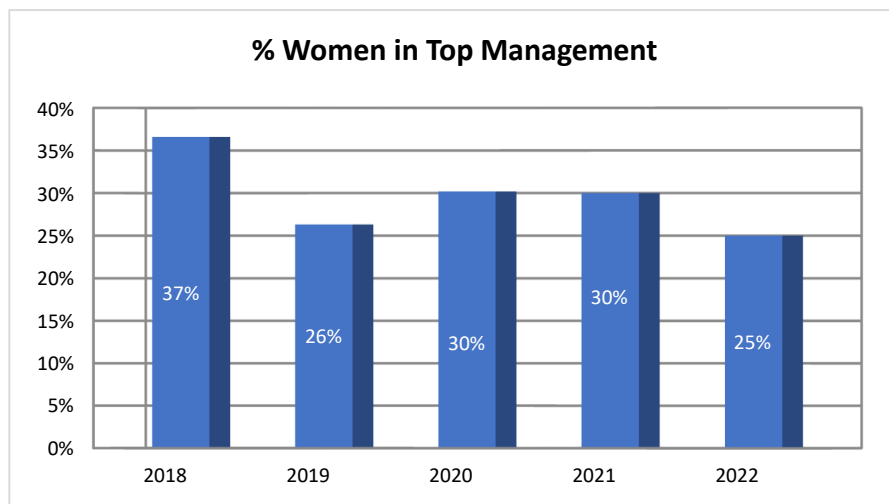
We also have a Protocol against sexual and gender-based harassment, which was renewed in 2022, which includes procedures and resources for the prevention and response, where appropriate, to possible cases of sexual or gender-based harassment that may occur at BATZ.

In the specific case of BATZ Mexicana, we also continue to work closely with the State Government and maintain our status as an Inclusive Company, which we were already awarded for in 2019.

You just need to look at the indicators the BATZ Group monitors for this issue, which can be seen below. Insofar as the female collective in our organisation, the percentage of women at the BATZ Group is 22.45%, which is lower than the data for previous years.



If that analysis is shifted to upper level management for the group (all positions on the management committees at either the group or local level are considered top level management) the percentage of women is 25%.



(*) All policies and their descriptions are available in item 2, Policies.

Equality Plan

In compliance with the current legal framework for the equality between men and women, in 2013 we carried out an external **equality** diagnosis in the group parent with a very satisfactory result in terms of compliance with the requirements. That diagnosis led to the development of a specific action plan and the establishment of an equality committee. This committee is made up of members from different business areas, is appointed every four years and meets annually. The committee was updated in 2022, and the already established lines of work were given continuity.

The activities of the Equality Plan are divided into three areas: values, people management and communication. It is a plan circumscribed to the parent company, but it should be noted that BATZ complies with the legislated principles by having an advanced management plan, a map of professions and because equality (of all kinds) is a very internalised issue **within** the entire group.

These activities are aligned with the Sustainable Development Goals of the United Nations 2030 agenda.



VII. HUMAN RIGHTS

No. 28 - Traceability table in compliance with the Non-Financial Information and Diversity law

Our code of conduct

The BATZ Group has had a code of conduct since 2017. It is more than a document and contains various rules and procedures that regulate the responsible behaviour of all the people who make up BATZ. The code of conduct intends to consolidate a company culture that already exists at the BATZ Group that was built on the values inherent to the company. Compliance with the Code is based on cooperation, trust and respect, as well as on the confidential treatment of all Communications between the people representing the BATZ Group and the third parties with whom it is in contact.

The code of conduct is framed within our compliance programme. **It is a set of procedures and good practices adopted by BATZ to identify and classify the operational and legal risks** we face and to create internal mechanisms for prevention, management, monitoring and reacting to them.

As we have been saying throughout this document, organisations like us have had to face significant changes that have also affected the expectations the stakeholders we have relationships with have of us. For that reason, in 2022 we reviewed our code of conduct, paying close attention to the following.

- Potential changes caused by the law, like criminal, mercantile, fiscal, labour, administrative or sector rules
- The update of the guidelines, policies and other internal rules for the company that we did in 2021

In big headlines, and even though the previous version already included them, in the new document we provide a more detailed explanation of our alignment with and mechanisms of compliance with the Universal Declaration of Human Rights of the United Nations, Fundamental Conventions of the International Labour Organisation (ILO) and OECD guidelines. Both areas are demanded more and more by our stakeholders and, especially, by the OEMs we have relationships with.

Area of application



The Code of Conduct applies throughout the BATZ Group at a global level, without prejudice to the continued respect for any local legislation that may strengthen the minimum and mandatory requirements described here.

People to whom the Code applies



Everyone in the BATZ Group, including the Companies Controlled by BATZ, S. Coop.

Communication of the Code



This Code of Conduct is communicated to all new recruits in the BATZ Group through the Induction Plan established for that purpose. For Personnel already employed on the date of approval of the Code of Conduct, its deployment is foreseen throughout 2022 with meetings, the intranet and corporate newsletters at every plant. Third parties will receive copies of the code of conduct through the website and specific publications, as was done with the previous version. It will be the responsibility of the Management of each Controlled Company to ensure that there is effective dissemination of the Code of Conduct.

The Compliance Committee



The BATZ compliance committee, presided by the Compliance Officer, has jurisdiction over all issues that fall under compliance. In parallel to updating the document, a new committee was also formed.

Non-compliance and communication to the Ethical Channel



Failure to comply with this Code of Conduct constitutes an infringement of the Compliance Programme, and may lead to employment or company sanctions, without prejudice to the relevant administrative or criminal sanctions.

To facilitate compliance with the Code of Conduct, there is a confidential and internal Ethical Channel, through which:

- Any possible questions about the interpretation or practical application of the Code of Conduct are managed.
 - Any possible violations of this Code are reported.
- Everybody who belongs to BATZ who is aware of an improvement area or non-compliance with this code of conduct or the protocols it is carried out through must notify compliance management directly through the ethical channel. The reporter will be informed about the progress of the communication made to the Ethics Channel.

No communication has been received during 2022 that applies to compliance with this code.

Insofar as the ethical channel, for 2023 our goal is to improve the process or complaint channel to comply with the law and make it anonymous (even for the compliance manager).

No. 29 - Traceability table in compliance with the Non-Financial Information and Diversity law

Principles that guide the behaviour of all the people that make up BATZ

Prohibition of forced labour and recruitment policy

The BATZ Group does not tolerate forced or obligatory labour of any kind, in accordance with the ILO basic labour standards.

The BATZ Group does not use nor does it directly or indirectly resort to work obtained against the person's free will through the use of threats, punishments, deprivations, the application of systems of slavery or semi-slavery or through any other human rights violations. The BATZ Group pursues a recruitment policy in accordance with the legislation in force, including, in conformity with this, anything that gives entitlement to social protection, which demonstrates a commitment to stable and quality employment, and establishes a remuneration policy that provides a decent standard of living.

The BATZ Group is opposed to the use of forced or illegal labour of any kind in its commercial activities.

The BATZ Group

- Will not use forced labour²
- It will not obligate its employees to do forced labour or slave labour

The BATZ Group addresses the expectations and needs of the People with the aim of achieving an adequate balance between their private and their professional life, with a view to ensuring that these measures do not detract from the competitiveness of the organisation, paying special attention to the obligations of those people who must care for dependants.

The prohibition of human trafficking and protecting foreign citizens

The BATZ Group takes up the protection of foreign citizens through compliance with the corresponding immigration regulations.

People in the BATZ Group will not collaborate with a person who is not a national of a European Union Country entering, staying or travelling through the country in a way that violates the applicable laws for the entrance and travel of foreigners.

If an event is detected related with this section, the compliance committee will be notified to analyse the causes and determine the pertinent corrective and preventive actions.

Prohibition of child labour and protecting minors

Protecting minors is an ethical principle of the BATZ Group that involves not using child labour, understood as work that deprives minors of their childhood, their potential of their dignity and that is prejudicial for their physical and psychological development.

At the same time, child labour is understood to be the prohibition of employing minors who have not reached legal working age. The BATZ Group guarantees that legally underage workers who have not turned 18 will not work at night or overtime. And that they are protected against working conditions that are damaging to their health, safety or development, in accordance with the Minimum Age Convention, 1973 (no. 138) and the Charter of Fundamental Rights of the European Union 2012/C 326/02.

The BATZ Group will not hire minors³ and will have a registry in which the birth dates of all the workers appear.

If a minor is found in one of our plants the compliance committee will be notified to rescind the corresponding contract and, likewise, the causes will be analysed and the pertinent corrective and preventive actions will be determined.

The BATZ Group will guarantee the tasks assigned to young workers will not interfere with their school attendance and they will observe that the total time for work and school for young workers will not exceed 10 hours.

² Forced labour is considered to be work done under threat of punishment or confiscation of goods or belongings (like a national ID card or passport), and which the person has not voluntarily agreed to do.

³ In accordance with the 1973 International Labour Organisation's (ILO) Minimum Age Convention, any person below the age of 15 is considered a child, except in cases where the local laws apply a greater age or greater age for obligatory education, in which case the greater age will be applied. Local laws may allow the employment of people between 13 and 15 or 12 and 14 for jobs that:

- Do not damage the health or development of the minor, and
- do not obstruct attendance at school or training programmes

Equality and a respectful work environment

The BATZ Group aims to create a work environment in which trust and mutual respect prevail, so that everybody will pursue, at all professional levels, relationships based on mutual respect, integrity, cordiality, trust and collaboration and effort in teamwork, fostering a respectful work environment among colleagues, line managers and people in charge, in order to achieve a positive working atmosphere.

We adhere to a rigorous and objective selection policy, paying attention exclusively to the academic, personal and professional merits of the candidates and to the needs of the BATZ Group.

The BATZ Group training programmes guarantee equal opportunities and career development and contribute actively to the achievement of the Group's objectives. Also, promotion is based on the merit, ability and individual performance of the People.

Accordingly, we expressly undertake not to discriminate on the basis of race, religion, gender, age, nationality, sexual orientation, gender identity, marital status, disability or any other circumstance likely to be a source of discrimination.

Freedom of association, collective bargaining and external activities

The BATZ Group respects engaging in social and public activities by the people who make it up, as long as it does not interfere with their professional activity.

The BATZ Group respects the right to unionise, free association and collective bargaining in the labour sphere. Any personal links with political parties or other kinds of entities, institutions or associations with a public purpose must be done in a way that makes it clear such links are individual and any relationship with the BATZ Group must be avoided.

Privacy, use of personal data and confidentiality

The BATZ Group respects people's right to privacy, in all its forms, as well as the personal communications of people via the Internet and other means of communication. In particular, the privacy and confidentiality of personal data will be respected. Access to personal data is limited to certain, duly authorised company personnel, who will be required to sign a Confidentiality Agreement.

Accordingly, the BATZ Group undertakes not to disclose personal data unless the interested parties consent or in cases of legal obligation or compliance with judicial or administrative rulings. Under no circumstances may personal data be processed for purposes other than those provided for either legally or contractually.

Clients and suppliers

The BATZ Group uses criteria based on sustainability and social responsibility in its supplier selection processes and promotes socially responsible practices through the organisation's supply chain. In selection processes with suppliers and clients everyone must apply the criteria of quality, opportunity, cost and sustainability and always act in defence of the BATZ Group's interests. This obligation particularly affects those who have to make decisions on contracting supplies and services and those who decide the financial conditions of transactions with Clients.

The BATZ Group has a supplier sustainability policy that contains the minimum requirements that suppliers for the BATZ Group must pay attention to, including the corporate ethics, environmental protection, conserving resources, human rights and social standards. And it states that compliance with the code of conduct is obligatory for all suppliers for the BATZ Group.

The anti-corruption policy described in section 5.3 of this code is applicable for relationships with suppliers, associated people and clients.

Consequently, no kind of bribes or commissions can be given or received in relation with suppliers, associated people or clients. And no kind of illicit advantages can be given or received to people from other companies who are responsible for acquiring or hiring goods or services for the purpose that by not fulfilling their duties and violating the law products or services from the BATZ Group are acquired instead.

During 2022, no communication or complaint has been received through the channels established for this purpose.

These activities are aligned with the Sustainable Development Goals of the United Nations 2030 agenda.



VIII. CORRUPTION AND BRIBERY

No. 30 - Traceability table in compliance with the Non-Financial Information and Diversity law

Relations with the Authorities, Regulatory Bodies and Public Administrations shall be based on the principles of cooperation and transparency.

BATZ Group complies with its duties towards the various Public Administrations, in particular with the Tax Authorities, the Social Security and those in respect of which subsidies are received.

Corruption

The BATZ Group is against corruption, in all its forms, as well as unlawfully influencing the will of people outside of the BATZ Group in order to obtain some form of benefit or advantage. Extortion and bribery are expressly prohibited, including the direct or indirect offer or promise of any kind of illicit advantage, as well as influence peddling.

The prohibitions established in this section also extend to persons closely related by family ties or friendship to the private individual, authority or public official concerned.

Gifts policy

Gifts or offerings are intended to promote the image of the BATZ Group brand. Neither the management nor other members of the BATZ Group may offer, give, solicit or accept, directly or indirectly, any gifts, invitations, favours or compensations, in cash or in kind, of whatever nature, for illegal purposes or contrary to this Code of Conduct.

Exports

In the framework of export control, the cross-border exchange of goods is subject to prohibitions, restrictions, government approval or other kinds of supervision.

In its import and export activities the BATZ Group complies with all the regulations regarding importing and exporting goods, services and information that have been established in the applicable laws and the internal regulations of the BATZ Group and the external regulations established by other operators, and all their suppliers are also obligated to comply with them.

It is absolutely forbidden to do business with people or companies that appear on official sanctions lists for sanctioned countries, regardless of the delivery process. Activities that may be related with contraband are expressly forbidden.

When making decisions regarding importing and exporting goods and services, it must be carefully determined whether the decision may be subject to export control. If there is any doubt guidance must be requested from the operations management.

Preventing part falsification

The BATZ Group develops, implements and maintains effective methods and appropriate processes for its products to reduce to a minimum the risk of using falsified parts or materials in the products it delivers.

Subsidies

The request for subsidies by any of the companies of the BATZ Group will always be supervised by the Group's Financial Corporate Area, which will ensure the correct application of the relevant regulations, with external advice for their management and ensuring their correct justification through external audits.

It will ensure that the subsidies requested or received from the Public Administrations receive the appropriate use, avoiding any falsification of the conditions for receiving them or giving them a different use to the one for which they were awarded.

Prevention of money laundering and the financing of terrorism

The BATZ Group complies with all the domestic and international guidelines about money laundering and terrorist financing that are applicable.

Customer identification, information and internal control measures will be applied and maximum cooperation will be given to the competent authorities.

In order to prevent and avoid money laundering or the financing of terrorist operations arising from criminal or illicit activities, employees should pay particular attention to the prevention of conduct that may be related to such illicit behaviour.

Conflicts of Interest

The BATZ Group believes that its relationships with the people who make it up should be based on loyalty that is rooted in their common interests. Consequently, people should avoid any situation which produces a Conflict of Interest.

Political activity

Any Person from the BATZ Group has the right to participate on an individual basis in political matters but their participation in politics will not be related to the Group.

No BATZ Group company may illegally fund candidates or political parties.

It is strictly prohibited to access funds or credits of public origin without the prior authorisation of the Financial Director of the BATZ Group.

During 2022, no communication or complaint has been received through the channels established for this purpose.

These activities are aligned with the Sustainable Development Goals of the United Nations 2030 agenda.



IX. SOCIETY

9.1 THE COMPANY'S COMMITMENTS TO SUSTAINABLE DEVELOPMENT

No. 31 - Traceability table in compliance with the Non-Financial Information and Diversity law

More than half a century has passed since BATZ made the commitment to be a socially responsible company committed to its entire ecosystem. It is an industrial group that addresses the needs of the present without compromising the future. But above all, it is a project that was born as a cooperative and that has been able to combine expansion and a global disposition with roots and commitment to bring about a socio-economic transformation of its environment.

Generating wealth in our environment

We promote initiatives for economic and social development with respect for the communities in which we are integrated. In addition, our presence in various locations around the world promotes, directly and indirectly, the training and qualification of people as well as driving economic activity that is located in our closest environment. We are proud to state that our initiatives are aligned with the objectives defined in the 2030 agenda for sustainable development.

SOME OF THE SOCIAL INITIATIVES AND COLLABORATIONS OF THE BATZ GROUP	
<i>Commitment to culture and sport</i>	We support and promote initiatives related with sport and culture through sponsoring and organising sport and cultural activities.
<i>Commitment with a healthy work-life balance</i>	We promote a healthy work-life balance for people not just part of our internal talent, but also people who participate in external initiatives like Red Denbbora Sarea and the Fundación Novia Salcedo, among others.

<i>Commitment to social and labour integration</i>	Mundukide DYA Fórmula Student Fundación Aladina Asociación Desarrollo Comunitario Gazteleku Asociación Dislexia Dislebi Asociación esclerosis múltiple Bizkaia Adembi Fundación Kukumiku
<i>Commitment to local development</i>	Fundación Errota
<i>Other initiatives</i>	Basque House Association : Batz Mexicana participates in cleaning the outside of the "San Juanico" landfill for storing non-hazardous waste, which is an area with a large environmental impact.

Disclosure as the engine of value generation

At BATZ we are committed to generating value and promoting the development of our environment through the transfer of our knowledge, as we firmly believe that the communication of it is a decisive pillar for creating links with our environment and collaborating in its economic and social development.

PARTICIPATION IN WORKSHOPS AND EVENTS
Fundación ERROTA BASQUE ECODESIGN CENTER AIC APD CEBEK CRE100DO HEGAN (BASQUE AEROSPACE CLUSTER) ERKIDE BAI EUSKARARI ELKARTEA Automobilový klastr MS kraje Klub personalistů MS kraje Ekokom CEARC AVEQ QUÍMICA Spanish Chamber Automotive Group Aderiac HR committee of the Tres Naciones industrial park Aderiac safety committee Aderiac training committee Aderiac labour relations committee Tres Naciones industrial park mutual aid committee

Commitment to the professionals of the future

The continuous transformation of the sector means that the qualification requirements of both current professionals and those who will join the sector in the future are evolving very quickly. Undoubtedly, training and attracting talent is another of the great challenges facing the industry in general.

At BATZ, we perform actions to favour the access of young people to their first job, as well as improving our positioning among young people in order to attract profiles that share our mission, vision, and values. Along these lines,

in addition to participating in trade shows and employment forums or organising visits to our facilities, BATZ carries out an intense work of dissemination and talent development while collaborating with training, innovation and training programmes in all the countries where it is present, ranging from Dual Training to projects such as the Formula Student, in which engineering students develop a single seat car for competing in international circuits. We also regularly welcome visits from training centres and universities.

PARTICIPATION IN WORKSHOPS AND EVENTS	
Mar'22	Úřad práce (Labor Authority)
Apr'2022	20th Anniversary of the Euskera plan
Sep'22	2022Vysoká škola báňská TU (university)
Nov'22	2022 Basque Circular Summit

Contributions to not-for-profit associations

CONTRIBUTIONS	
<i>Basque House</i>	RMB 2,262
<i>Fundación ERROTA</i>	Donation of sensorized photovoltaic installation
<i>Igorreko Eskola</i>	Donation of computer equipment
<i>CLUB DEPORTIVO ELORRIO</i>	€4,000
<i>ASOCIACION DALACANDELA</i>	€6,000
<i>ONGI ETORRI ERREFUXIATUAK BIZKAIA</i>	€6,000
<i>ASOCIACION VASCA DE MINUSVALIDOS BIDAIDEAK</i>	€6,000
<i>ASOCIACION SEGUNDA OPORTUNIDAD ANIMALES SIN HOGAR</i>	€2,000
<i>WOP</i>	€1,418
<i>AZEBARRI KULTURA ELKARTEA</i>	€2,000
<i>CLUB DEPORTIVO SALESIANOS DEUSTO</i>	€4,000
<i>CLUB LUTXANA ARRAUN ELKARTEA</i>	€6,000
<i>ASOCIACION DESARROLLO COMUNITARIO GAZTELEKU</i>	€6,000
<i>NORTE ELKARTEA PROMOCION DEPORTIVA</i>	€2,000
<i>ASOCIACION SUNU GAAL</i>	€6,000
<i>ASOCIACION ADEMBI</i>	€6,000
<i>ASOCIACION MADRES Y PADRES CEP ARANGOITI</i>	€2,000
<i>ASOCIACION PARKINSON ASPARBI</i>	€6,000
<i>ASOCIACION DISLEXIA DISLEBI</i>	€6,000
<i>ASOCIACION NIÑOS CON ENFERMEDADES HEPATICAS</i>	€6,000
<i>CLUB BALONCESTO MUNGIA</i>	€4,000
<i>CLUB DEPORTIVO URDANETA</i>	€4,000
<i>ASOCIACION ANIMALISTA GUREAK</i>	€2,000
<i>ASOCIACION SOINU HAIZEAN</i>	€2,000
<i>ASOCIACION TIEMPO LIBRE NUESTRO CLUB</i>	€2,000
<i>FUNDACION KULUMIKU</i>	€2,000
<i>INTEGRAME DOWN, A.C.</i>	MXN 651.16

X. OUTSOURCING AND SUPPLIERS

No. 32 - Traceability table in compliance with the Non-Financial Information and Diversity law

In 2021, we launched our new supplier policy, which is a document that sets forth the minimum requirements suppliers must meet regarding **corporate ethics, environmental protection, conserving resources, human rights and social standards**. We expect all suppliers to **meet all the applicable legal requirements** in those areas and avoid incidents or conditions whose outcome may result in a violation of the law.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY AND GOOD GOVERNANCE

Suppliers and the entire supply chain must adopt environmental practices that are sustainable, responsible and that promote the **conservation of natural resources** and raw materials. We request an **environmental management system** that is preferably certified by an international standard like ISO 14001 or EMAS.

They must ensure that their products and supply chain minimise the use of natural resources in a responsible way, including water management, reducing waste generation, improving energy efficiency and reducing the carbon footprint of their operations. To those ends suppliers **must implement effective measures to reduce direct and indirect CO₂ emissions**, starting by using clean energy and mitigating greenhouse gas emissions related with transport.

Our suppliers must identify legally restricted substances and **guarantee declarations of substances and materials** are in compliance with the laws regarding those products, e.g. REACH (regulation for registration, evaluation, authorisation and restriction of chemicals), RoHS (restriction of hazardous substances), ODS (ozone depleting substances), WEEE (waste from electrical and electronic equipment), the batteries directive, and the directive about vehicles at the end of their useful life, etc.

Our suppliers will comply with the legal requirements for **transporting hazardous goods**, like ADR, IATA DGR, IMDG code, ADN, RID, etc.

The commitment is to only use raw materials, whose extraction, production, transport, commerce, processing and export does not contribute directly or indirectly to human rights abuse, health and safety problems, environmental pollution or *compliance* infractions, in our products. We have created process in accordance with the **“OECD due diligence guide for responsible supply chains for minerals in areas affected by conflict and high risk areas”**. Complying with this commitment is obligatory in the entire supply chain. All our suppliers, especially foundries and refineries, must provide a “conflict minerals reporting template” (3TG) created by the Responsible Minerals Initiative (RMI) that guarantee their management and provides evidence for the sustainable management of other minerals like cobalt, lithium or copper.

As part of our management and organisational model (*compliance* programme), we have created a **code of conduct** that is available on the BATZ suppliers website. Compliance with the code is obligatory for all suppliers of the BATZ Group. It is based on cooperation, trust and respect and the confidentiality of all communications between people who represent the BATZ Group and the stakeholders they are in contact with.

BATZ is committed to **respecting human rights and working conditions** and also requires it of their supply chain, which is why they demand that suppliers treat their employees with dignity and respect. Of particular importance is the prohibition of child labour, modern slavery, harassment and discrimination, and guaranteeing the right to free association and collective bargaining.

Every supplier must provide **all the employees with a safe and healthy workplace** and follow the regulations and safety and occupational health practices. And they must inform the competent authority of accidents and injuries and any unsafe devices, practices or conditions.

At BATZ we carry out a continuous evaluation that studies performance in terms of sustainability, strengths and possible weaknesses of each of the suppliers that form or will form part of our panel, on the basis of which we proceed to their approval and classification. This continuous evaluation makes it possible to identify possible risks as well as to establish improvement measures and joint action plans.

Main lines of action in 2022

The main lines of action during the period were still focused on optimising the capture, management and analysis of data, which is enabling us to achieve greater standardisation, integration, reliability and agility in the management of our supply chain.

Along those lines, in 2022 we focused on advancing our standardisation project for components and item purchases for different projects, which will simplify management of suppliers and item and stock numbers, among other things, and subsequently, more integral, agile, traceable and reliable administration of our entire chain.

XI. CONSUMERS

No. 33 - Traceability table in compliance with the Non-Financial Information and Diversity law

Due to our activity, the BATZ Group does not have direct contact with end consumers, only with manufacturers in the sector, complying with the standards defined in the IATF 16949 standard, considered the most widely used international quality management system standard in the motor industry. The risks posed by this new environment are minimised and cybersecurity is guaranteed in processes and communications, based on the international reference standard ISO 27001:2014.

Furthermore, and as explained in our Code of Conduct, the BATZ Group respects intellectual and industrial property rights (copyrights, patents, utility models, industrial designs, trademarks, domain names and other rights) as well as the business secrets held by Clients or any other third parties with whom we have a relationship.

Our integral management system and policies like our commitment to developing solutions with higher performance and greater added value is making it possible for us to stand beside the OEMs in this major challenge, which is that of a new concept in connected, more efficient and environmentally friendly mobility. Our progress in weight reduction, active aerodynamics and mechatronics are making it possible to reduce CO2 emissions of our clients' vehicles, make gains in efficiency and, consequently, comply with stricter and stricter regulations and respond to consumer expectations, who are demanding more environmentally friendly vehicles.

Channels of communication

Because we are a direct supplier for OEMs, at BATZ we have a clearly defined process for handling complaints from our clients (*BS/PG-10.2-01-Handling client complaints*), in which the stages, responsibilities, documentation and affected organisations are defined, to the following ends.

- Providing a rapid response to any customer complaint about the established Quality requirements or contracts, minimising the effect of the deviation and guaranteeing its resolution.
- Ensuring a correct analysis, so that we are able to identify the root cause of the deviation, which in turn allows us to establish the most effective corrective actions.
- Properly recording deviations and the appropriate corrective actions, whether temporary or final, and their follow-up and effectiveness.
- Promoting collaboration and communication between the different areas concerned in order to seek and consolidate permanent solutions to the deviations detected.
- Modifying and adapting the documentation, as a result of the corrective actions established.

In addition to the above, the BATZ Group provides all interested parties with a form on the corporate website, which they can use to send us suggestions, complaints and claims.

XII. FISCAL INFORMATION

No. 34 - Traceability table in compliance with the Non-Financial Information and Diversity law

PROFITS OBTAINED COUNTRY BY COUNTRY

No country by country information was provided because that information is sensitive for the Group's commercial activities.

TAX ON PROFITS PAID

The amount of income tax paid was 259 thousand Euros in 2022.

PUBLIC SUBSIDIES

The non-refundable grants amounted to 668 thousand Euros in 2022.

These activities are aligned with the Sustainable Development Goals of the United Nations 2030 agenda.



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XIII. NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY					
AREAS	Contents	N o.	GRI Standards		GRI description
Global	The non-financial information statement will include the information necessary to understand: *the evolution, *the group's profits and situation and *the impact of their business activities in regards to, at least: *environmental issues, *social issues, *respecting human rights *the fight against bribery and corruption, in addition to staff issues, including measures that have been adopted to encourage the principles of equal treatment and opportunities for men and women, non-discrimination and inclusion of people with disabilities and universal accessibility *	---			
Business model	Brief description of the business model of the group, including: 1) Its business environment 2) Its structure and organisation 3) The markets in which it operates 4) Its goals and strategies 5) The primary trends and factors that can affect its future evolution	1	102-1	2-1	Company name
			102-2	2-6	Activities, brands, products and services
			102-3	2-1	Location of the headquarters
			102-4	2-1	Location of the operations
			102-6	2-6	Markets served
			102-7	2-6 2-7	Size of the organisation
			102-14	2-22	Statement by senior executive decision-makers
Policies	A description of the policies the group applies regarding those issues, which will include: 1) The due diligence procedures used for identifying, evaluating, preventing and attenuating risks and significant impacts 2) The verification and monitoring procedures including what measures have been adopted	2	103	3-3	For the management focus <u>in every area, which internal policies they have will need to be highlighted</u>

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	N o.	GRI Standards		GRI description
Results of the KPI policies	<p>The outcome of those policies including key non-financial outcome indicators that make the following possible:</p> <p>1) Monitoring and evaluating progress and</p> <p>2) encouraging comparability between companies and sectors in accordance with domestic, European and international reference frameworks used for each issue</p>	3	103	3-3	Management focus in every area
Risks in short, medium and long term	<p>The primary risks related with these conditions linked with the group's activities, among them when it is pertinent and proportional, is their commercial relationships, products or services that may have negative effects in those areas, and</p> <p>* how the group manages those risks,</p> <p>* explaining the procedures used for detecting and evaluating them in accordance with domestic, European and international frameworks of reference for every issue.</p> <p>* It must include information about the impacts that have been found and provide an itemised list of them, in particular the primary risks in the short, medium and long term.</p>	4	102-15	2-12 2-25	Main impacts, risks and opportunities
			205-1		Operations assessed for corruption-related risks
			413-1		Operations with local community participation, impact assessments and development programmes
			407-1		Operations and suppliers whose right to freedom of association and collective bargaining may be at risk
			408-1		Operations and suppliers with a significant risk of child labour cases
			409-1		Operations and suppliers with a significant risk of cases of forced or compulsory labour
KPIs	<p>Non-financial key performance indicators that are relevant to the specific business activity and meet the criteria of comparability, materiality, relevance and reliability.</p> <p>* With the goal of making it possible to compare information, both in time and between entities, in particular, standards of key non-financial indicators that may be applied generally and that comply with the European Commission directives in the subject and the <u>Global Reporting Initiative standards</u> will be used. And the domestic, European or international framework used for every topic must be stated.</p> <p>* <u>The key non-financial results indicators must be applied to each section of the non-financial information statement.</u></p> <p>* These indicators should be useful, taking into account the specific circumstances, and be consistent with the parameters used in the internal risk assessment and management procedures.</p>	5	102-54	Delete	Statement of preparation of the report in accordance with the GRI Standards

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	N o.	GRI Standards		GRI description
	* In all cases, the information submitted must be accurate, comparable and verifiable.				
Environmental issues	Global Environment				
	1) Detailed information about the <u>current and foreseeable effects of the company's activities in the environment</u> and, as may apply, in health and safety, evaluation procedures and environmental certification 2) <u>The resources dedicated to preventing environmental risks</u> 3) Using the precautionary principle, <u>the amount of provisions and guarantees for environmental risks</u>	6	103	3-3 2-23	Management focus in <u>every area</u>
			102-11	Delete	Precautionary principle or approach
			201-2		Financial implications and other risks and opportunities arising from climate change
			308-1		New suppliers that have passed evaluation and selection filters according to environmental criteria.
			308-2		Negative environmental impacts in the supply chain and measures taken
	Pollution				
	1) <u>Measures for preventing, reducing or repairing carbon emissions that seriously affect the environment</u> 2) Taking into account any form of activity-specific air pollution, including noise and light pollution.	7	103	3-3 2-23	Emissions// Biodiversity management approach
			305-5		Reduction of GHG emissions
			305-6		Emissions of ozone depleting substances (ODS)
			305-7		Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions.
	Circular economy and waste prevention and management				
	<u>Circular economy</u>	8			Effluent and waste management approach// Circular economy

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	N o.	GRI Standards		GRI description
	<u>Waste:</u> Measures for prevention, recycling, reuse, other forms of recovering and eliminating waste		301-2		Recycled supplies
			301-3		Reused products and packaging materials
			103	3-3	Effluent and waste management approach
			306-2		Waste by type and disposal method
			103	3-3	Effluent and waste management approach//Food waste
	<u>Actions to combat food waste.</u>				
	Sustainable use of the resources				
	Water <u>consumption</u> and water supply in <u>depending on local limitations</u>	9	303-1		Extraction of water by source
			303-2		Water sources significantly affected by water extraction
			303-3		Recycled and reused water
	<u>Consumption of raw materials and the measures adopted to improve the efficiency of their use:</u>	10	103	3-3	Materials Management Approach
			301-1		Materials used by weight or volume.
			301-2		Recycled supplies
	Direct and indirect <u>energy consumption, measures taken to improve energy efficiency and the use of renewable energies</u>	11	103	3-3	Energy Management Approach
			302-1		Energy consumption within the organisation
			302-2		Energy consumption outside the organisation
			302-3		Energy intensity
			302-4		Energy consumption reduction
			302-5		Reducing the energy requirements of products and services
	Climate change				
The important elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces:	12	103	3-3 2-23	Emissions management approach	
		305-1		Direct GHG emissions (Scope 1)	

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	N o.	GRI Standards		GRI description
			305-2		Indirect GHG emissions from energy generation (Scope 2).
			305-3		Other indirect GHG emissions (Scope 3)
			305-4		GHG emissions intensity
			305-5		Reduction of GHG emissions
	103		3-3 2-23	Emissions management approach	
	201-2		Financial implications and other risks and opportunities arising from climate change		
	103		3-3 2-23	Emissions management approach	
	305-5		Reduction of GHG emissions		
	Protection of biodiversity				
	<u>Measures taken to preserve or restore biodiversity:</u>	13	103	3-3	Biodiversity Management Approach
			304-1		Owned, leased or managed operation centres located within or adjacent to protected areas or areas of high biodiversity value outside protected areas
			304-3		Protected or restored habitats
			306-5		Bodies of water affected by water discharges and/or run-offs
<u>Impacts</u> caused by activities or operation in protected areas			304-2		Significant impacts of the activities, products and services on biodiversity
Social and employee issues	Employment				
	<u>Total number</u> and distribution of <u>employees by gender, age, country and professional classification:</u>	14	103	3-3 2-23	Employment Management Approach
			102-8	2-7	Information on employees and other workers
			405-1		Diversity in governing and employee bodies
	<u>Total number and</u> distribution of <u>kinds of labour contracts</u>	15	102-8	2-7	Information on employees and other workers
	<u>Yearly average</u> of <u>permanent contracts, temporary contracts and part time contracts by gender, age</u>	16	102-8	2-7	Information on employees and other workers

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	N o.	GRI Standards		GRI description
	and professional classification		405-1		Diversity in governing and employee bodies
	Number of terminations by gender, age and professional classification;	17	401-1		New employee recruitment and staff turnover
	Average salaries and their variation broken down by gender, age and occupational classification or equal value;	18	405-2		Ratio of basic salary and remuneration of women compared to men
			103	3-3 2-23	Employment + Diversity and Equal Opportunities
	Salary gap , remuneration for equal job titles or societal averages		405-2		Ratio of basic salary and remuneration of women compared to men
	The average remuneration of the executive officers and managers , including variable compensation, per diem expenses, payment into long term supplemental savings plans and any other reason itemised by gender	19	103	3-3 2-23	Diversity and Equality management approach - giving average remuneration values for Directors by gender
			102-35	2-19	Governance: remuneration policies
			102-36	2-20	Governance: processes for determining remuneration
			102-38	2-21	Governance: ratio of total annual compensation
			102-39	2-21	Governance: ratio of percentual increase of total annual compensation
	Implementation of right to disconnect policies	20	103	3-3	Employment Management Approach
	Employees with <u>disabilities</u>	21	405-1		Diversity in governing and employee bodies
	Work organisation				
	Organisation of work time	22	103	3-3	Employment Management Approach
	Number of hours of <u>absenteeism</u>		403-2		Accident types and accident frequency rates, occupational diseases, lost days, absenteeism and number of deaths due to accidents at work or occupational diseases
	Measures aimed at facilitating a healthy work-life balance and encouraging co-parental practice of it by both parents		103	3-3	Employment Management Approach
	Occupational health & safety				
	Health and safety conditions at work;	23	103	3-3 2-23	Occupational Health and Safety Management Approach

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	N o.	GRI Standards		GRI description
	Workplace accidents, in particular their frequency and seriousness		403-2		Accident types and accident frequency rates, occupational diseases, lost days, absenteeism and number of deaths due to accidents at work or occupational diseases
	Occupational diseases: itemised by sex		403-3		Workers with a high incidence or high risk of activity-related illnesses
	Labour relations				
	Organisation of the social dialogue , including procedures for notifying and consulting staff and negotiating with them	24	103	3-3	Worker-company relations management approach
	Percentage of employees covered by collective bargaining agreements by country:		407-1		Operations and suppliers whose right to freedom of association and collective bargaining may be at risk
	The balance of collective bargaining agreements, especially in the field of occupational health and safety		102-41	2-30	Collective bargaining agreements
			403-1		Worker representation in formal worker-company health and safety committees
	Training				
	The policies implemented in the field of training:	25	103	3-3	Training and Education Management Approach
	The total amount of training hours by professional category		404-1		Average hours of training per employee per year
	Universal accessibility for people with disabilities	26	103	3-3	Diversity and Equal Opportunities Management Approach + Non-Discrimination
	Equality				
	Measures adopted to promote equal treatment and equal opportunities for men and women	27		3-3 2-23	Diversity and Equal Opportunities Management Approach + Non-Discrimination
	Equality plans (chapter III of Spanish organic law 3/2007 of 22 March for the effective equality of men and women), measures adopted to promote employment, anti-sexual or sex based harassment protocols, and the integration of and universal accessibility for people with disabilities:		103		
	The policy against all kinds of discrimination and, as applicable, diversity management				

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	N o.	GRI Standards		GRI description
Human rights	Following <u>due diligence procedures</u> regarding human rights Preventing the risks of violating human rights and, where applicable, measures for mitigating, managing and repairing possible abuses committed	28	103	3-3 2-23 2-27	Evaluation of human rights + Freedom of association and collective bargaining + Child labour + Forced or compulsory labour Management Approach
			102-16	2-23	Values, principles, standards and norms of conduct
			102-17	2-16 2-26	Advisory mechanisms and ethical concerns
			412-3		Significant investment contracts and agreements with human rights clauses or subject to human rights screening
			412-2		Employee training on human rights policies and procedures
			410-1		Security personnel trained in human rights policies and procedures
			412-1		Operations subject to human rights impact assessments or reviews
			406-1		Cases of discrimination and remedial action taken
	<u>Indictments</u> for cases of human rights violations	29	407-1		Operations and suppliers whose right to freedom of association and collective bargaining may be at risk
	<u>Promoting and complying with</u> the provisions of the <u>fundamental conventions</u> of the <u>International Labour Organisation</u> related with respecting free association and the right to collective bargaining:		103	3-3 2-23	Non-Discrimination Management Approach
	<u>Eliminating employment and job discrimination</u>		406-1		Cases of discrimination and remedial action taken
	The <u>elimination of forced or obligatory labour</u> :		409-1		Operations and suppliers with a significant risk of cases of forced or compulsory labour
	The <u>effective abolition of child labour</u>		408-1		Operations and suppliers with a significant risk of child labour cases
	Measures adopted to <u>prevent</u> corruption and bribery	30	103	3-3 2-23 2-27	Anti-Corruption Management Approach
			102-16	2-23	Values, principles, standards and norms of conduct
			102-17	2-16 2-26	Advisory mechanisms and ethical concerns
			205-1		Operations assessed for corruption-related risks
			205-2		Communication and training on anti-corruption policies and procedures

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	N o.	GRI Standards		GRI description
			205-3		Confirmed cases of corruption and measures taken
	<u>Measures to fight</u> against money laundering		205-2		Communication and training on anti-corruption policies and procedures
	<u>Contributions</u> to foundations and non-profit entities		413-1		Operations with local community participation, impact assessments and development programmes
Society	Commitment with the sustainable development				
	The impact of the company's activities on employment and local development:	31	103	3-3 2-23	Local Communities + Indirect Economic Impacts Management Approach
			203-1		Investments in infrastructure and supported services.
			203-2		Significant indirect economic impacts
			413-1		Operations with local community participation, impact assessments and development programmes
	The impact of the company's activities on local populations and the region:		203-1		Investments in infrastructure and supported services.
			411-1		Cases of violations of indigenous peoples' rights
			413-1		Operations with local community participation, impact assessments and development programmes
			413-2		Operations with significant negative impacts (actual and potential) on local communities
	Relationships with local community actors and the modalities of the dialogue with them:		102-43	2-29	Approaches to stakeholder engagement
			413-1		Operations with local community participation, impact assessments and development programmes
			102-12	Delete	External initiatives
	Membership or sponsorship activities		102-13	2-28	Membership of associations
	Subcontracting and suppliers				
	* Social, gender equality and	32	102-9	2-6	Supply chain

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	N o.	GRI Standards		GRI description
	environmental issues included in the <u>purchasing policy</u> * Social and environmental responsibility considered in <u>relationships with suppliers and subcontractors</u>	33	103	3-3 2-23	Supplier environmental assessment + Supplier social assessment + Procurement practices
			308-1		Environmental assessment of suppliers
			414-1		Social assessment of suppliers
	Supervision and audit systems and their results		103	3-3 2-23	Procurement practices management approach
	Consumers				
	Assessment of the health and safety impacts of product and service categories	33	103	3-3 2-23	Customer Health and Safety + Marketing and Labelling + Customer privacy Management Approach
			416-1		Health and safety impact assessment of the product or service categories
	Claims systems, complaints received and their resolution.		103	3-3 2-23	Customer Health and Safety + Marketing and Labelling + Customer privacy Management Approach
			416-2		Cases of non-compliance concerning health and safety impacts of product and service categories
	Tax information				
	Profits obtained country by country Taxes paid on profits	34	103	3-3 2-23	Economic performance management focus + quantitative tax and profit data
	Public subsidies received		201-4		Financial assistance received from government

XIV. INDEPENDENT VERIFICATION

DECLARACIÓN DE VERIFICACIÓN



EQA

Declaración de Verificación Independiente del Estado de Información No Financiera de BATZ, SOCIEDAD COOPERATIVA y sociedades dependientes del ejercicio 2022

A los socios y al Consejo Rector de **BATZ, S. COOP.**

De acuerdo con el artículo 49 del Código de Comercio, hemos realizado la verificación, con alcance de seguridad limitada del Estado de Información No Financiera (en adelante EINF) correspondientes al ejercicio anual finalizado el 31 de diciembre de 2022, de **BATZ, S. COOP.** y sus sociedades dependientes (en adelante el Grupo) que forma parte del Informe de Gestión consolidado de 2022 adjunto del Grupo.

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 apartado **XIII. TRAZABILIDAD DE CUMPLIMIENTO DE LA LEY DE INFORMACIÓN NO FINANCIERA Y DIVERSIDAD**, incluida en el Informe de Gestión consolidado adjunto.

Responsabilidad de la Dirección

La Dirección de 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 el anexo I, del citado Informe de Gestión consolidado

Asimismo, la Dirección de 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.

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.

Número: 11555-E

Fecha de Verificación: **05 / 04 / 2023**

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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



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 **BATZ, S. COOP.**, del 29/03/2023, 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 basado en los procedimientos realizados y en las evidencias que se han obtenido. El encargo se ha realizado de acuerdo con una metodología propia y los requisitos de la Norma Internacional UNE-EN ISO/IEC 17029 "Evaluación de la conformidad. Principios generales y requisitos para los organismos de validación y verificación".

El alcance de un encargo de seguridad limitada es 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 **BATZ, S. COOP.** 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 el Grupo 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 del ejercicio 2022.

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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 el EINF de **BATZ, S. COOP** y sus sociedades dependientes correspondiente al ejercicio anual finalizado el 31/12/2022, no ha sido preparado, en todos los aspectos materiales, de acuerdo con los contenidos recogidos en la normativa mercantil vigente de acuerdo con lo mencionado para cada materia en la tabla del apartado **XIII. TRAZABILIDAD DE CUMPLIMIENTO DE LA LEY DE INFORMACIÓN NO FINANCIERA Y DIVERSIDAD**, del citado EINF.

Uso y distribución

La presente Declaración de Verificación se emite a la Dirección de **BATZ, S. COOP.**, 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.

Esperanza Martínez Garola
Directora de Certificación

Número: 11555-E

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