
NON- FINANCIAL INFORMATION STATEMENT

Sustainability Report

BATZ Group

2023

Date: 22/03/2024

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Consolidated non-financial information statement
for the annual period ending 31 December
2023, for BATZ. S. COOP. 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 that risk 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.

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I. OUR BUSINESS MODEL

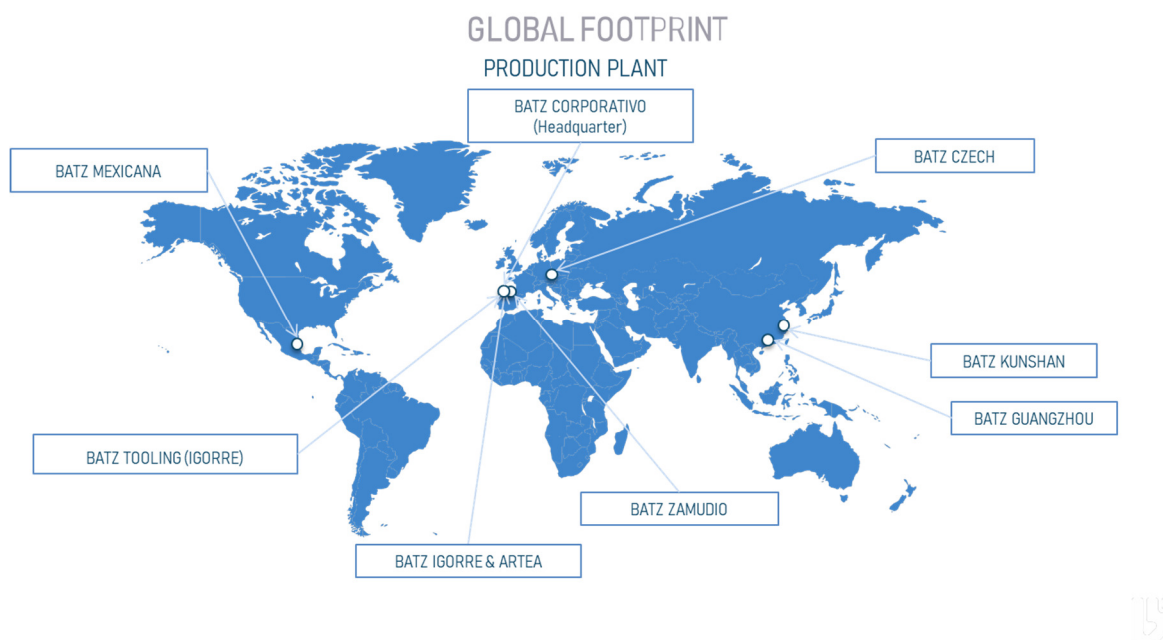
No. 1 - Traceability table in compliance with the Non-Financial Information and Diversity law

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.

The 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 based in the Arratia valley in Biscay with an international outlook that throughout its more than half-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 reviewed the cooperative project in order to align the company bodies in pursuit of the contributions and commitment of all workers so Batz could once again be a cooperative, profitable and sustainable project. That 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 outcome of **committed**, supportive and **entrepreneurial** people. We are defined by:

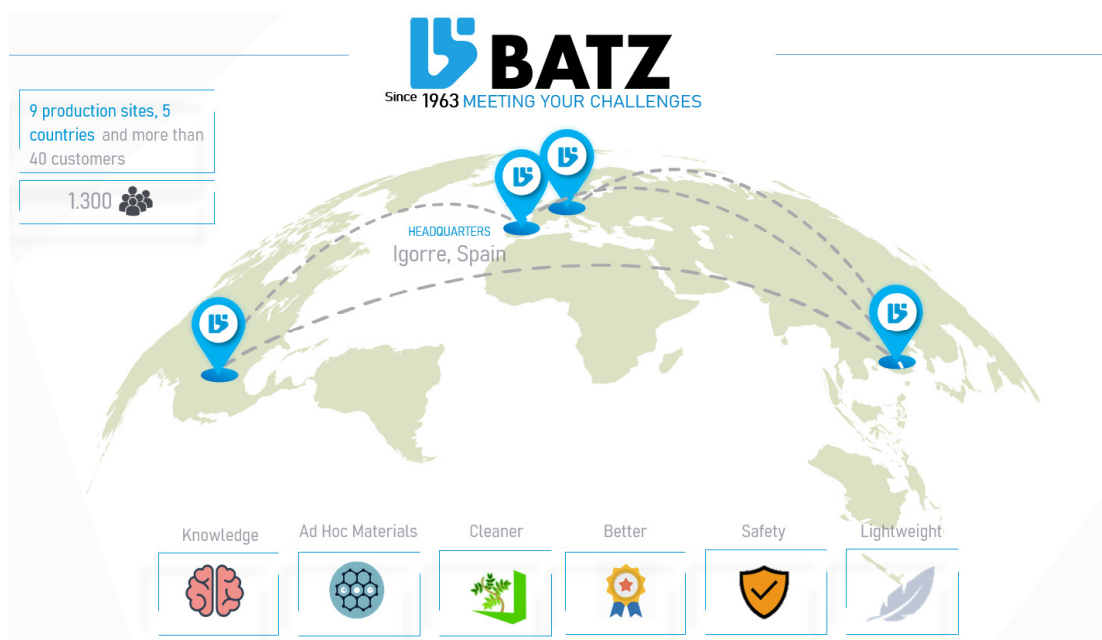
- Our commitment to cooperative principles, which are the fundamental base for developing a different business model that is democratic, supportive, equitable and committed to sustainability and social change
- We believe in the cooperative legacy and, because of that, in addition to a better and more 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 have a presence
- Our origin and roots are in Arratia That is why we have decided to act globally, to keep following up on our initial purpose 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 its 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 2022 and 2023 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.

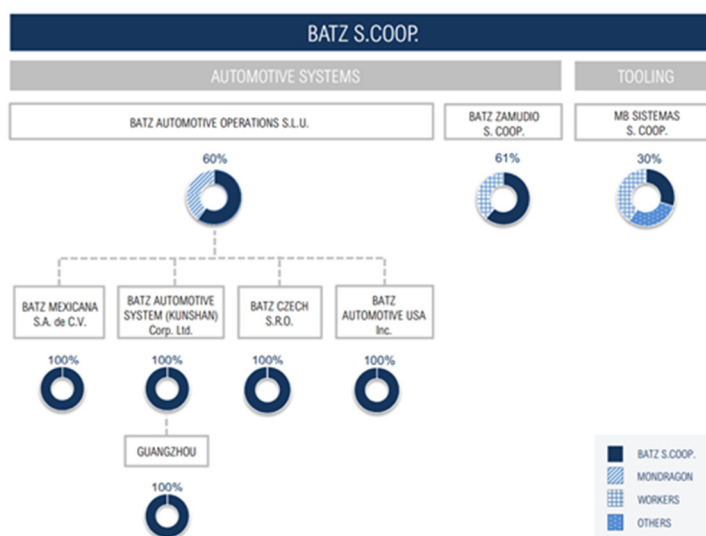
1.2 2023 ORGANISATIONAL STRUCTURE

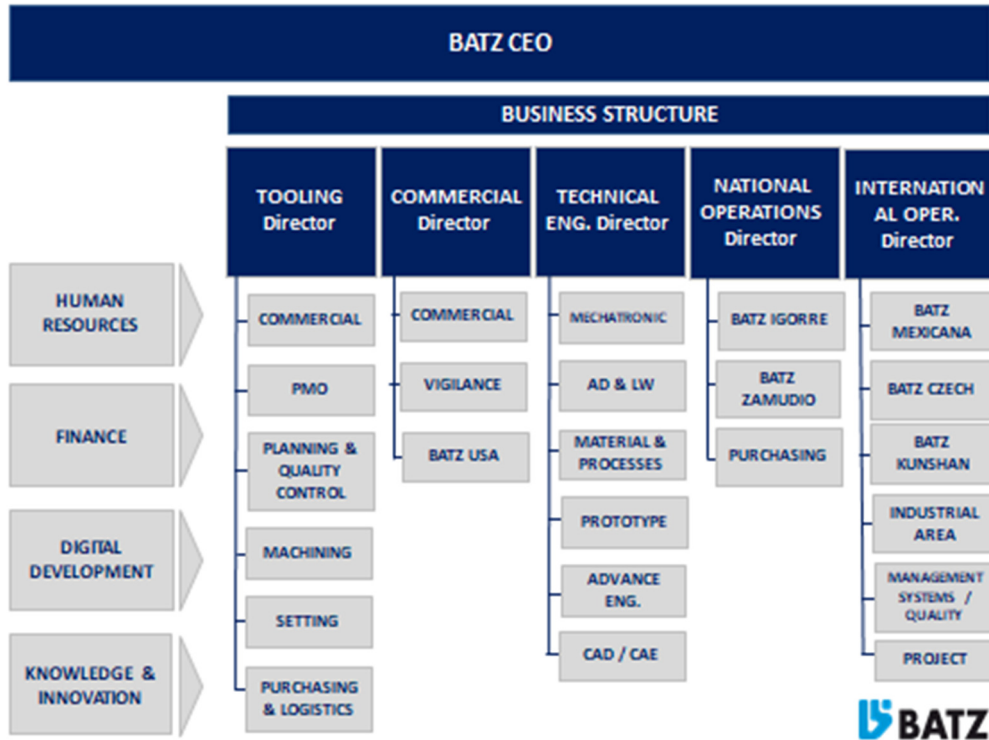
The BATZ Group is committed to a business model that is supported by cooperative values which sets the company apart.

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 outline:

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.

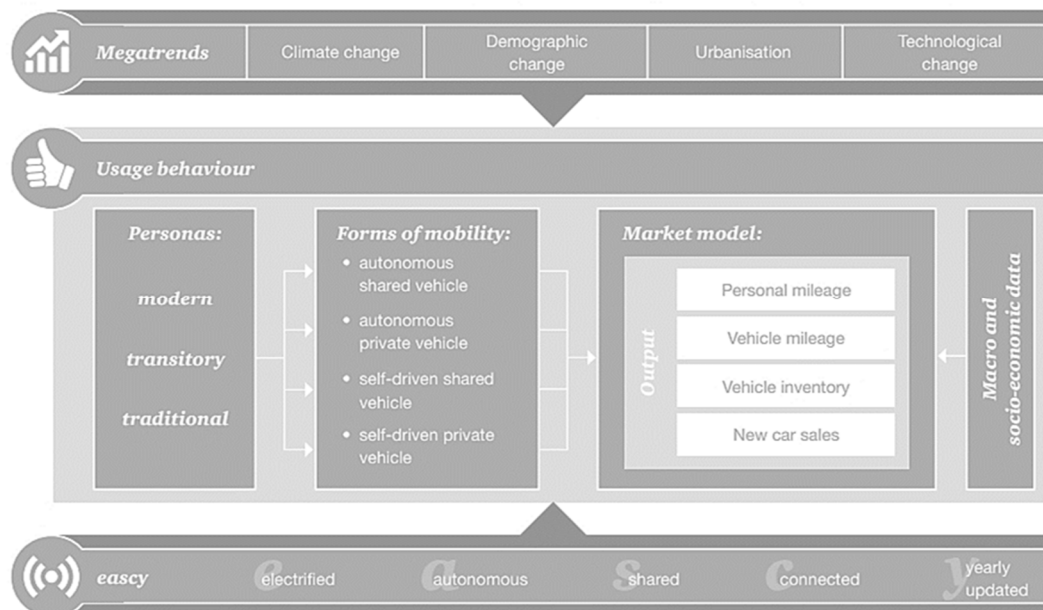




1.3 OUR CHALLENGES

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 coined¹

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



¹ Eascy: 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 our self 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.

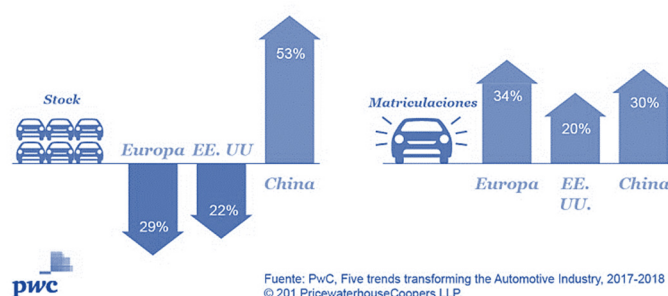
2023, A recovery year for the industry

We can say that 2023 was a year of recovery for the automotive industry. In general, the situation progressively improved in comparison with recent years, which were marked by COVID-19, the war in Ukraine, the semiconductor shortage, and previously unseen price increases for raw materials and energy costs.

Some of the more important facts we could mention are:

- The significant increase in light vehicle production worldwide, bringing fulfilment close to the order portfolio
- The containment of raw material prices and energy costs
- Very good behaviour in the markets, mainly in the United States, China and Europe
- Liquidity problems in companies

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



1.4 HOW WE DO IT

Taking into account the difficulties of the last few years and the situation of the industry described above, the priorities for 2023 were focused on re-dimensioning the activities, financing and profitability of the businesses. These were the challenges taken on:

- Hold out with the TOOLING business at 12 million € of billing and not have it drain resources from Batz as a totality
- Improve the profitability and quality of the AUTO business:
 - Domestic: focused on Biscay, which includes our Igorre and Zamudio plants
 - International, which encompasses our projects in China, Mexico and the Czech Republic
- Improve quality and take a step towards recovering positive profitability in the international subsidiaries, focusing on the plants in Mexico and the Czech Republic
- Strict management of treasury and finances, focusing on liquidity and reporting
- Adapting and consolidating the corporate structure to the new size of the organisation

Responding to a new concept in 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.



It should be noted that in late 2023 we started the process of strategic analysis for the coming four years, which is currently in its final phase but pending approval. Consequently details about it will be included in next year's report.

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 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, and at the same time improve 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

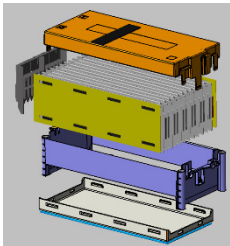
The premise that innovating is taking on challenges in an efficient way is deeply ingrained at BATZ. It is a culture of innovation and entrepreneurship that goes beyond the merely technological sphere and that we deploy throughout our entire value proposition. For many years we have been moving forward 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 Research Programmes

Batteries

SABRE

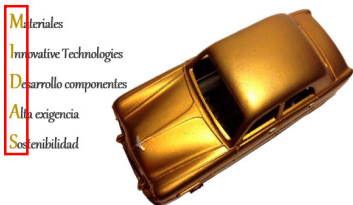


The Hazitek project is to obtain training and develop a battery pack for the eBus market. The goal is to expand knowledge about the internal and external components of batteries for electric vehicles and analyse the possibilities of supplying them in a competitive way. Modules, and a functional battery pack, will be developed and produced in collaboration with the consortium. BATZ's contribution consisted of developing advanced materials for diverse functionalities required: structural, EMI shielding and fireproofing.



Circular economy

MIDAS



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 material demonstrators and different technologies, two of which are already in our portfolio. A third innovative structural demonstrator will be included that evolves from metal to composites.



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 has developed a multi-material modular platform with a combination of advanced high strength steel, hybrid metal laminates and structural composites that were characterised in an experimental and virtual way using multi-scale modelling tools.

The ALMA project ended last January. **BATZ** participated in it alongside an international consortium of companies, laboratories and technology centres and the FORD OEM, with the goal of **redefining the future of more sustainable automotive transport and manufacturing**.



Among other milestones, a **22% reduction in the weight of the structure** of the base vehicles was achieved by using lightweight structural materials and developing a design that suited those materials.

In that regard, BATZ made a contribution with their knowledge of **polymer materials** and the processes involved in transforming them by designing a complete dash panel and a battery cover with several grades of SMC as an optimised alternative to the original metal ones. A **24% reduction of the CO₂ equivalent footprint** over the lifetime of the vehicle was achieved.

The project lasted for three years, and afterwards BATZ was able to prototype the demonstration dash panel so it can be validated.



Mechatronics

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.

This project ended in December 2023.



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

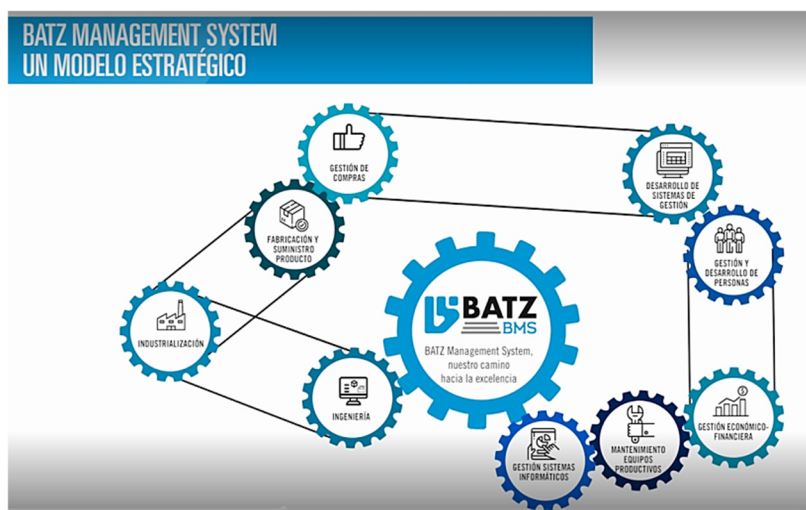
Active protection of the EDR server and BATZ mobile devices will be implemented, in addition to managing and protecting remote access.



You can see all the programmes we participate in in the Innovation section of our website www.batz.com.

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.



- That is the context in which the BATZ Manufacturing System is evolving into the BATZ Management System and becomes a model of excellence based in continuous improvement that provides support for our organisation's entire activity and takes into account the totality of the processes in it to create a standard method for day to day management. In other words, that means the easiest, safest and most effective way to do a task. The process began in 2020 and its deployment continued throughout 2023 at all levels of the organisation.

Along those lines, this year the training activities have focused on the methodologies of the improvement projects, for example the improvement projects focused on the various operations areas. The consolidation of our plants around BMS and operational areas, in addition to the corporate area with **Kaizen Support**, has helped us with BMS consolidation and its goals and, consequently, greater team involvement, should be highlighted.

The continuity of the knowledge block for using real-time data analysis to improve efficiency in the welding process based on lessons learned in previous years in injection technology should be highlighted.

In 2023 the deployment and follow-up of the strategy became consolidated in the area of operations (Igorre, China, Mexico and the Czech Republic) following the **Kaizen leaders** standards.

Likewise, during the year we took steps for improvement in the **daily Kaizen** pillar, and achieved higher efficiency in meetings thanks to analysing the problems due to improving the quality of loss control.

In the area of **excellence at work**, we continued improving the management of our flows through redesigning the line and line edge at the plants in the operations and lay-out review area, like what was done at our CZECH plant. The work done on WIP management should be highlighted. One example is the results obtained at the plants in China and the Czech Republic. We would also like to mention the deployment of the implementation of the TPM methodology to improve the efficiency in the Igorre plant, Mexico and Czech Republic.

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 or the company's 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

2023:

- Obsolete computer equipment was donated to several educational centres.
- We keep extending the useful life of IT devices, replacing parts that with use decrease the performance of the devices (e.g. batteries).
- The BG/IT-8.1-03.01 Equipment and Sustainability for Assets technical proceeding was reviewed to adapt it to the new characteristics of devices.

2024:

- We continued with our donations of obsolete IT material to educational centres to give it another life and prevent it from becoming obsolete.
- We will optimise the temperature of the DPC to save energy.

Cybersecurity

2023:

- The plants in China and Mexico obtained TISAX certification.
- We did group level training in how to act during a ransomware attack with the participation of 425 people who had a 95% successful completion rate.
- The first three phases of the Cybersecurity Management Plan were implemented.
- An OT audit was done throughout Igorre as part of the Cybersecurity Management Plan

2024:

- We will do an internal phishing campaign, in addition to training in information security in prototypes and every-day security best practices.
- We will renew ISO 27001.
- We will do specific training in cybernetic attacks for people in management.
- A robust infrastructure for disaster recovery, which includes the Zamudio DPC being prepared to keep working in case of a disaster at the Igorre DPC, will be designed and it will start to be implemented.
- An analysis of ISO 21434 in relation to OT security will be done.
- We will strengthen the data use area at Batz.
- We are going to audit and proceduralise how to set permissions for folders. We will start with IT and continue with TISAX red zones.
- We are going to change the access and marking system at Zamudio to go from digital to cards to comply with the AEPD (Spanish Data Protection Authority) directives.
- We will implement phases four and five of the Cybersecurity Management Plan.

II. POLICES

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.



From the initial impact of COVID-19 and 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.

After reviewing the different policies, we can say that in 2023 we have only updated the environmental policy and supplier sustainability policy to include much more detailed information, per the requirements of some of our clients.

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 **unique global management system** that ensures compliance with standards, policies and lessons learned throughout the entire organisation.

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 is comprised 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). In that way, the requirements are defined in a coherent order with the organisation's planning and process management. All the requirements for each certified standard: ISO 9001, IATF 16949, ISO 14001, ISO 45001, ISO 9100, ISO 27001; as well as specific client requirements or requirements stemming from legal regulations, are evaluated in the various 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 2023, 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 87%** on the NQC - SAQ 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**. In the last five 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

3.1 GLOBAL RISKS AND TRENDS

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, 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.

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

ETHICS AND GOVERNANCE

- » Decision-making and specific actions related with social and individual values and standards compliance.

PRODUCTS AND SERVICES

- » Building a value proposal that is characterised by being competitive, flexible, versatile and innovative.

PEOPLE AND SOCIETY

- » Talent aligned with and motivated by a common project
- » Strengthen the value chain is a sustainable way combining efficiency and reliability

ENVIRONMENT

- » Excellence and sustainability of processes and products, minimising their environmental impact.

ECONOMIC ISSUES

- » Intelligent growth to reach a suitable size for our market

INITIATIVES

Adapting the ASG policies and code of conduct that contains updated rules and procedures that regulate responsible behaviour for everybody at BATZ, including suppliers, associated people and Clients Likewise, the action framework is included that guarantees effective information protection, providing value added in all processes, ensuring security, reliability and stability for systems. See sections II, VII and VIII of the of the report.

»

Management with a clear multi-product, multi-technology and multi-client orientation, designing and developing products and processes in an efficient way and geared towards the market based on a clear commitment to innovation, like in operational efficiency and data governance, that let us align our solutions with current trends of the sector. See the initiatives in section I of the report.

»

Drive cultural transformation towards a structure agile, efficient and collaborative organisational See the initiatives in section VI of the report

»

Develop a chain of close strategic suppliers, responding to a paradigm change that has been seen accelerated after the COVID-19 crisis, towards de-globalisation of the value chain, less influenced by aspects geopolitical and economic. See the initiatives in section IX of the report.

Foster a rational and sustainable use of resources, including improvements in energy efficiency and lowering our carbon footprint.

»

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.

»

Improve the key financial profile ratios

3.2 ANALYSIS OF THE RISKS AND OPPORTUNITIES ASSOCIATED WITH CLIMATE CHANGE (TCFD)

We should mention that at the start of 2023 we started to identify the list of transitional and physical risks that may affect the BATZ Group's businesses, taking into account their typology, location and situation at the time of the analysis. Based on that risk identification, the risks will be prioritised according to their likelihood and the severity of their impact. Analysis of qualitative scenarios, including a forecast of the impact on financial matters.

TRANSITIONAL RISKS:

The main risks identified for the automotive industry are the new emerging regulations related with the climate, either carbon prices, CBAM, reduction goals, etc., in addition to the associated technological risks associated with the green transition, and from the risk of getting left behind with new technologies.-

PHYSICAL RISKS

The limited availability of water, combined with the high demand for that raw material to be able to maintain industrial activity, makes it the greatest physical risk for the automotive industry. Floods and other severe weather conditions may also affect the supply chain and other activities, also curtailing industrial activity.

OPPORTUNITIES:

The main opportunities for the automotive industry, because it is a more mature industry, are centred on low-emissions products and services and improving sources of energy and resources.

Consequently, we now have to identify the risks and opportunities with the highest priority (moderate or high levels in terms of probability and severity), and their principle variables, so a roadmap can be created that marks the mitigation strategy for risks and the capitalisation strategy for the most important opportunities.

IV. KEY INDICATORS, KPIs

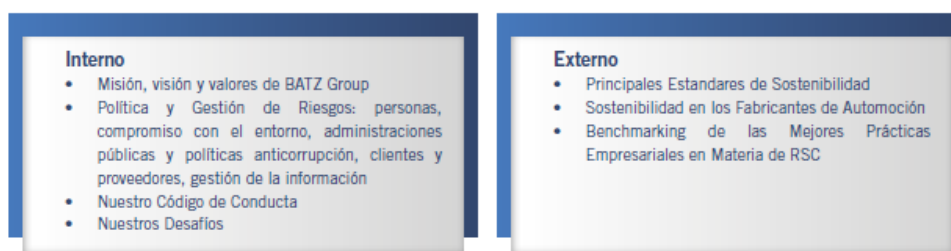
No. 5 - Traceability table in compliance with the Non-Financial Information and Diversity law
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4.1 MATERIALITY ANALYSIS

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.



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

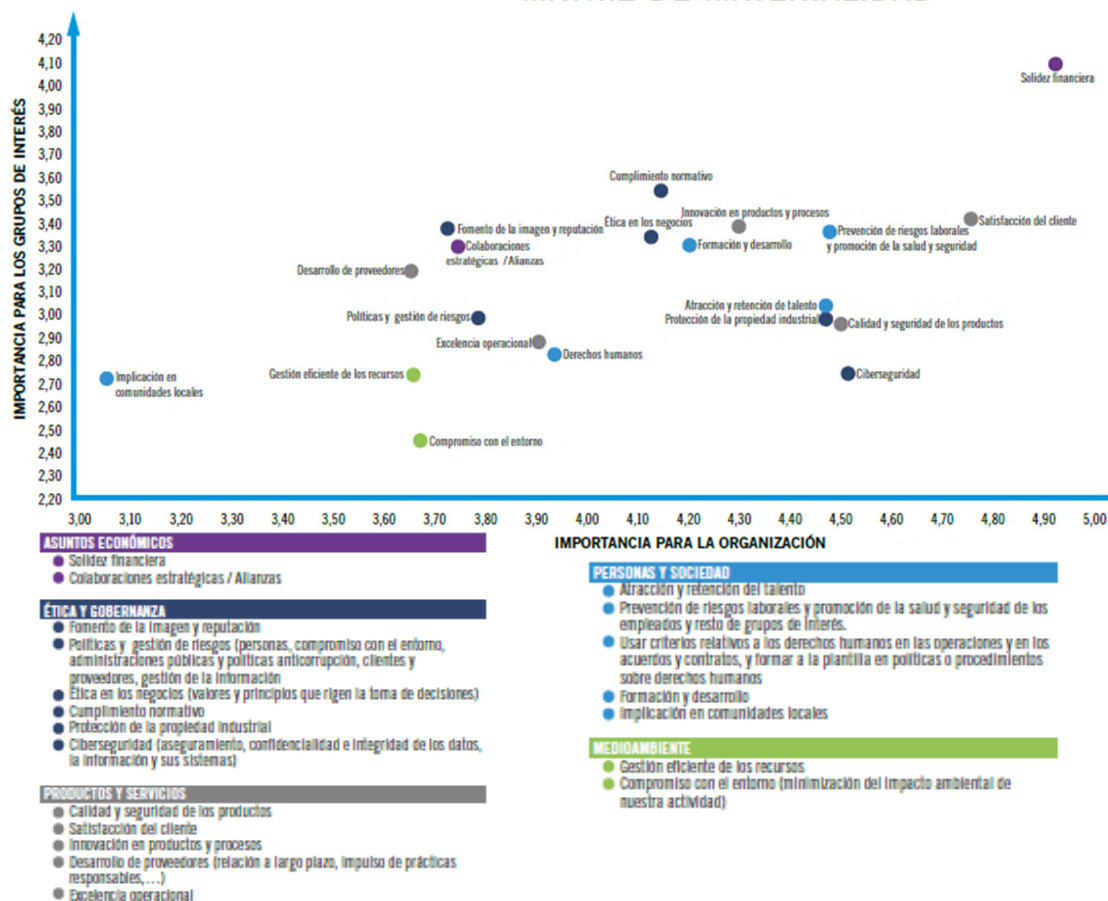


Sustainability in the BATZ Group is based on ensuring that the needs of stakeholders are met, while the business develops and generates value, through the following action framework:

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.

MATRIZ DE MATERIALIDAD



4.2 OUR STAKEHOLDERS

Our mission is clear, we are here to contribute to the success of our clients while also participating in local socio-economic development. And this can only be done through trust, integrity, cooperation 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 guide our **supply chain** and show the importance of reducing the environmental impact it causes.



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



We promote **the rational and sustainable use of natural resources, raw materials** and water, ensuring they are managed sustainably, and the **conservation of water quality and** natural spaces, including biodiversity, land use and deforestation.



Our carbon footprint will be reduced by designing processes with higher **energy efficiency and promoting the use of renewable energies**.



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



We are working on preventing **noise pollution** by including acoustic criteria in project management, in addition to periodically monitoring noise emissions.



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

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, on the front line of 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.

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 100% of our production plants are certified under the ISO-14001 standard.

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.

On the table below, the amount of resources dedicated to preventing environmental risks is shown.

The resources dedicated to preventing environmental risks	2023
TOTAL Amount	€354,103.19
3rd party audits	€24,593.12
External consulting and training	€18,294.25
Environmental inspections and measurement	€29,621.44
Waste management	€215,851.35
Environmental investments	€65,743.01

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

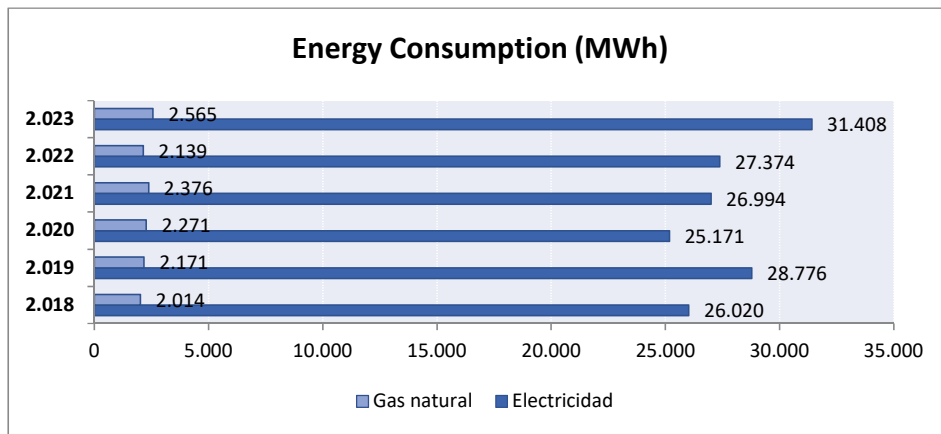
One of the aspects that can most influence industrial organisations is the high energy demand necessary for the development of their productive activities. At the BATZ Group we identify each of our energy sources and report their consumption on a monthly basis.

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.

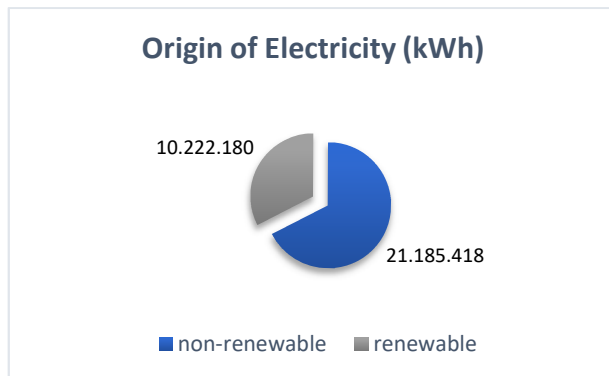
1. The path to consuming electricity from 100% renewable sources.
2. Replacing fossil fuels whenever viable and reducing their use when there is no existing technology that is technically and economically viable

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. An increase in consumption over 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 **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 6,924 L of diesel.



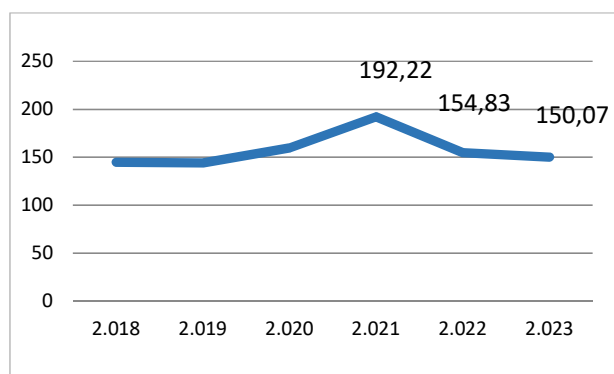
With 31,408 MWh consumed, the main energy source is **electricity**. Analysing the ratio of electricity consumed by hours of direct labour, we have had an increase of 5% from the previous year.

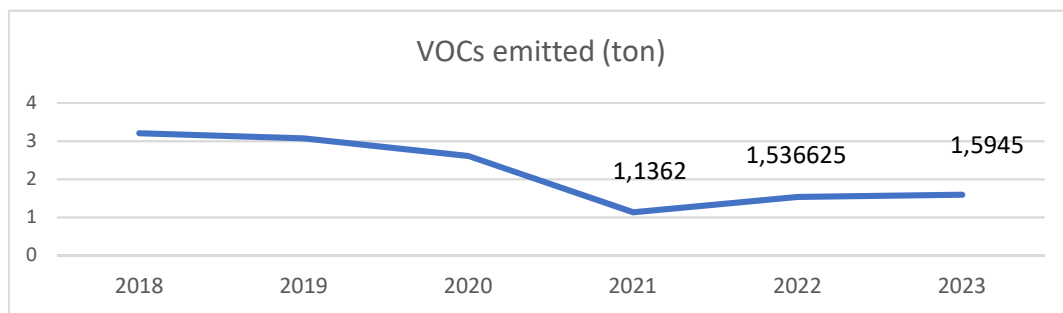
Insofar as the electricity consumed in our plants, we can confirm that at least 10, 222 MWh were produced using renewable energy. Knowing that the real figure is higher, but it is not shown because the data is impossible to verify, we can point out that the trend is positive and aligned with what is 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.

Energy intensity (kWh/m€)	
2,018	144.89
2,019	144.01
2,020	159.68
2,021	192.22
2,022	154.83
2,023	150.07





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 2023 the reports submitted by the plants have been considered satisfactory.

CARBON FOOTPRINT

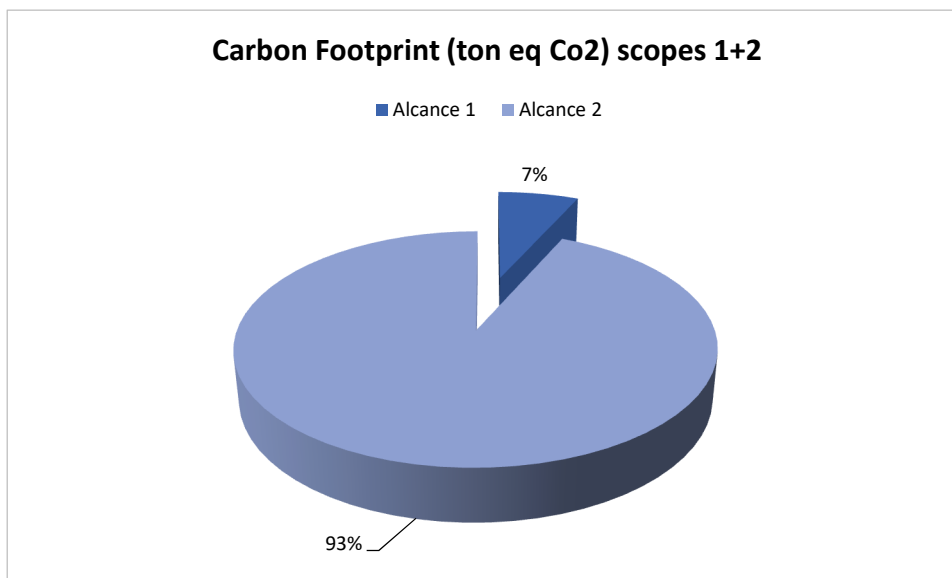
The BATZ Group integrates sustainability into its strategy and remains aligned with the SDGs. It is therefore embarking on the path to increase its understanding of its own carbon footprint, reflecting, among other things, on the impact of its energy consumption. This is the first step towards the future 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	
	2023	2022
Scope 1	852.38	1,572.07
Scope 2	10,530.22	9,350.59

GHG Category	Kg Co2 eq/mil € billing	
	2023	2022
Scope 1	3.64	8.50
Scope 2	44.94	50.54



The amount of emissions was lower than 2022 in regards to scope 1 and higher in regards to scope 2. We have included a new indicator for GHG emissions, which is the amount of Kg CO₂ emitted per €1,000 billed. The indicator was created to relate emissions with production. In that regard, the indicator improved in relation to 2022 for both scope 1 and scope 2.

5.2 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.

After the **circular economy diagnosis** for our serial production business for 2022, the analysis led us to determine 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

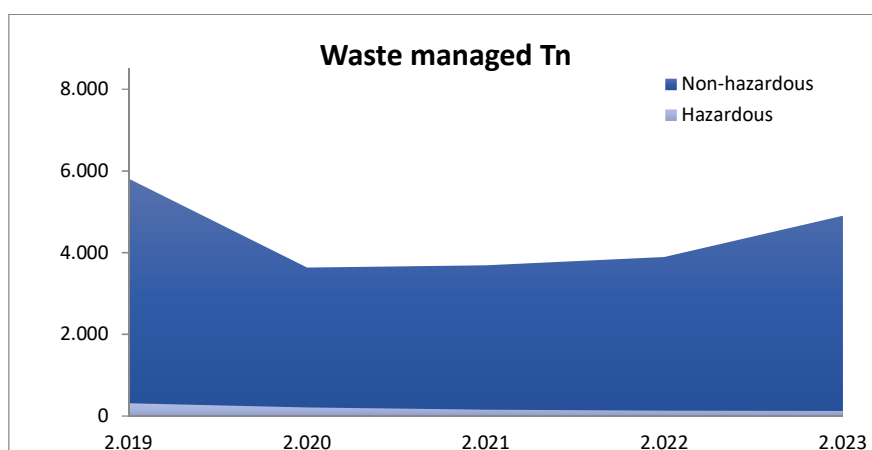
WASTE MANAGEMENT

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	2,020	2,021	2,022	2,023
Non-hazardous	5,183	6,916	5,811	3,630	3,687	3,890	4,901
Hazardous	403	408	311	207	150	128	120
TOTAL	5,586	7,324	6,122	3,838	3,837	4,018	5,021

The data shows a continuous drop in the weight managed since 2018. Its characteristics make hazardous waste notable. It is now 70.59% less than in 2018. Non-hazardous waste remained at around the same values as the previous year, although they were 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.

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

2,018	2,019	2,020	2,021	2,022	2,023
0.11	0.10	0.26	0.06	0.04	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.

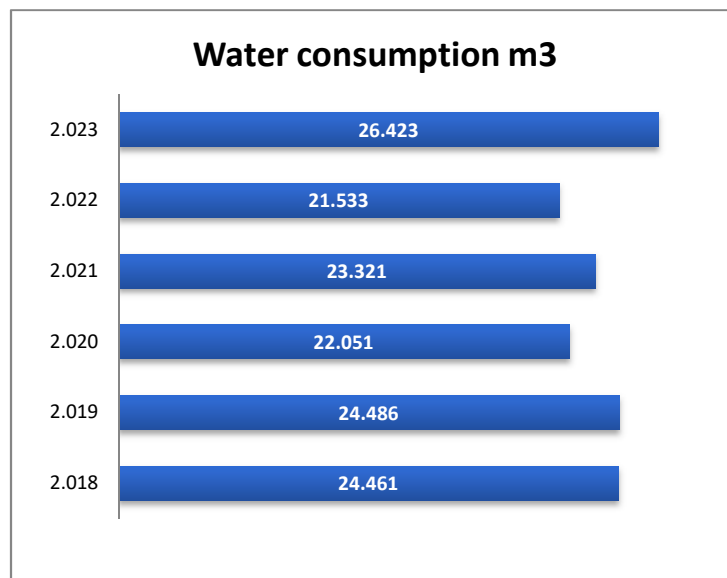
5.3 SUSTAINABLE USE OF RESOURCES

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 2023 was 26,423 m3, which is 23% more 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 2.86, with 1.77 being the value for 2018.

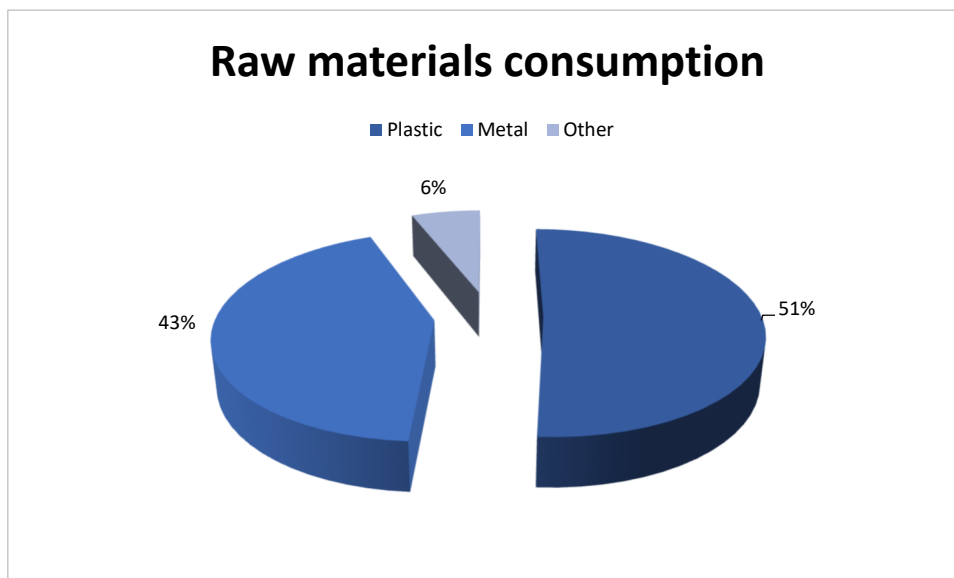
RAW MATERIALS CONSUMPTION

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 defects.

In absolute numbers, we consumed 20,891 tons of raw materials, where 43% is of metal origin (8,909 Tn) and 51% is of plastic origin (10,766 Tn), and the remaining 6% was other materials (1,216 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

In relation to the measures taken in 2023 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 Install new measurement software
- Energy consumption: Viability and savings analysis with installing photovoltaic panels We already have some investments approved for execution in some plants in 2024.
- Energy consumption: Installing software for measurement and actions to improve energy management
- Compressed air, reducing leaks found in audits

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.

This year we have launched our first mobility diagnosis in the Basque plants and we have created the associated sustainable and healthy **mobility plans**.

We have 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.

Actions have already been implemented in several plants, like installing chargers for electric vehicles in the plants in China and Zamudio.



BATZ Kunshan Plant



BATZ Zamudio Plant

5.5 PROTECTING BIODIVERSITY

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 (Bizkaia – Northern Spain), 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 nutreola* (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.



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 kempii, Squatina squatina,	3 Mustela lutreola, anguilla anguilla, hypnum fertile	15 Lepidochelys kempii, squatina squatina, Acipenser sturio	1 Campephilus imperialis	4 Yellow Pond Turtle, Baohua Yulan, Chinese Aligator, Isoetes sinensis	4 Yellow Pond Turtle, Baohua Yulan, Chinese Aligator, Isoetes sinensis
Under threat (No.)	21 Raja undulata, Laccariopsis mediterranea, balaenoptera musculus	14 Fomitopsis officinalis, Limoniscus 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	4 Tiger, Ulmus chenmuoi, changnienia amoena
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 meruloides, Cedrela odorata, Lepus callotis	11 Japanese Seahorse, Tianmu Mulan, Love Apple, Peking Gecko	11 Japanese Seahorse, Tianmu Mulan, Love Apple, Peking Gecko

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 collaborations 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, 2022 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.

- Carrier 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 **vitaly 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.**

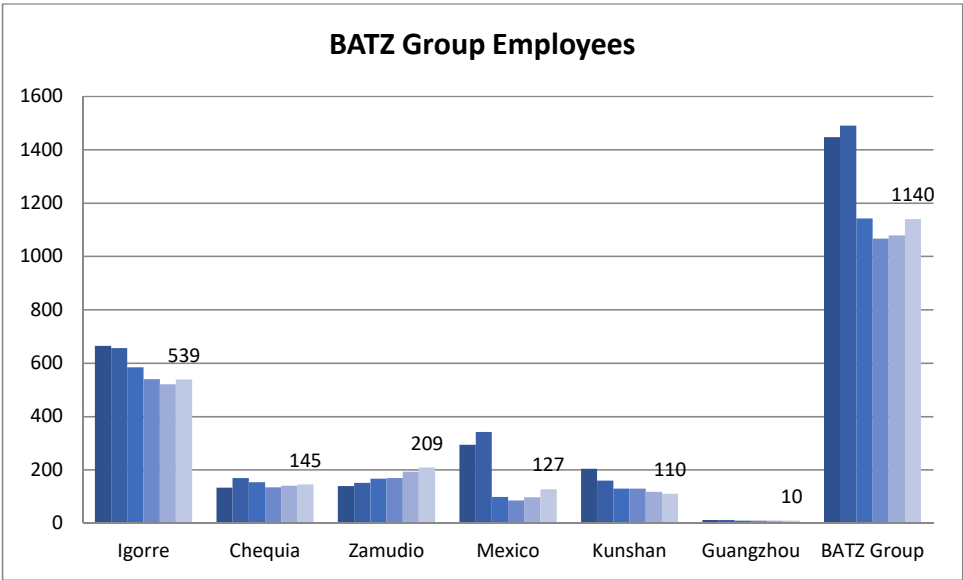
At BATZ we hold events and celebrations aimed at stimulating the feeling of belonging and building professional relationships between all BATZ members.

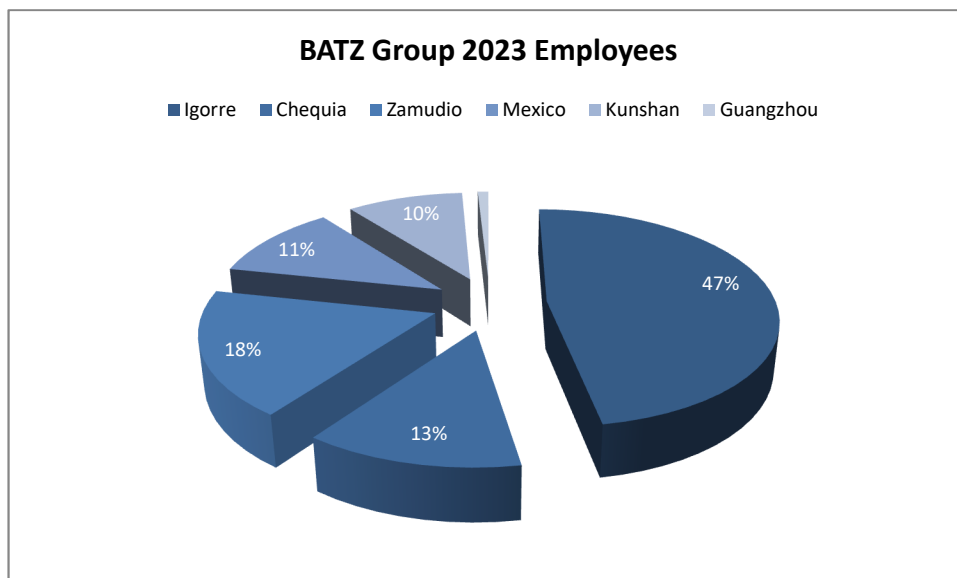
6.1EMPLOYMENT

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 in a scenario that was still a global pandemic, 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 (78% 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 2023 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)	2023	2022
Women	264	242
Men	876	836
Total	1,140	1,078

Number and percentage of employees by professional category and age group (as of 31 December)	2023	2022
Rest MOD		
Under 30	78	57
Between 30 and 50	366	355
Over 50	148	124
Rest MOI		
Under 30	46	36
Between 30 and 50	283	275
Over 50	110	114
Middle Management		
Under 30	4	4
Between 30 and 50	49	50
Over 50	15	15
Managerial Positions		
Under 30	0	0
Between 30 and 50	28	34
Over 50	13	14

Number and percentage of employees by professional category and gender (as of 31 December)		2023	2022
Rest MOD			
Women		124	103
Men		468	433
Rest MOI			
Women		116	112
Men		323	313
Middle Management			
Women		15	15
Men		53	54
Managerial Positions			
Women		8	12
Men		33	36

Total number and distribution of kinds of contracts (yearly average)	2023	2022
Permanent		
Contracts	860	838
Temporary	280	240
Full		
Time	1,112	1,047
Part	28	31

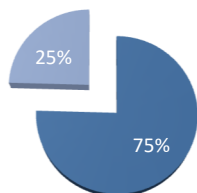
Total number of permanent contracts	2023	2022
By gender		
Women	173	154
Men	687	669
By age group		
Under 30	59	48
Between 30 and 50	548	584
Over 50	253	191
By professional classification		
Rest MOD	424	387
Rest MOI	331	332
Middle Management	65	65
Managerial Positions	40	39

Total number of temporary contracts		2023	2022
By gender			
Women		90	95
Men		190	146
By age group			
Under 30		48	53
Between 30 and 50		193	176
Over 50		39	12
By professional classification			
Rest MOD		168	125
Rest MOI		108	98
Middle Management		3	10
Managerial Positions		1	8

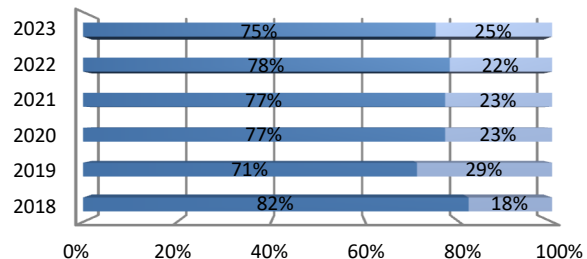
Total number of part-time contracts		2023	2022
By gender			
Women		16	18
Men		12	13
By age group			
Under 30		0	1
Between 30 and 50		24	27
Over 50		4	3
By professional classification			
Rest MOD		5	6
Rest MOI		21	21
Middle Management		2	3
Managerial Positions		0	1

BATZ Group 2023 Hiring

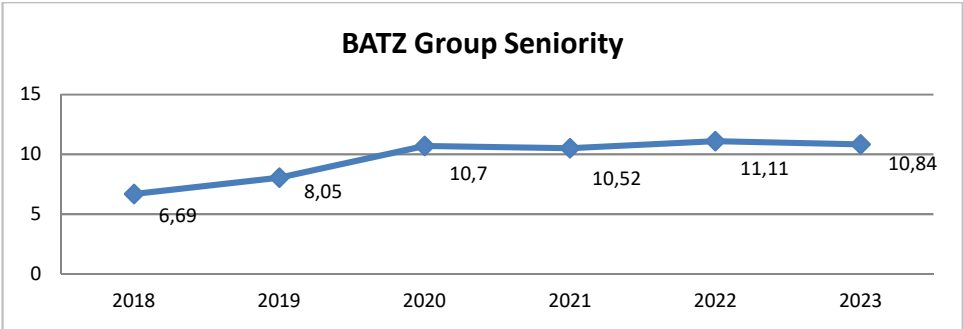
■ Indefinida ■ Temporal



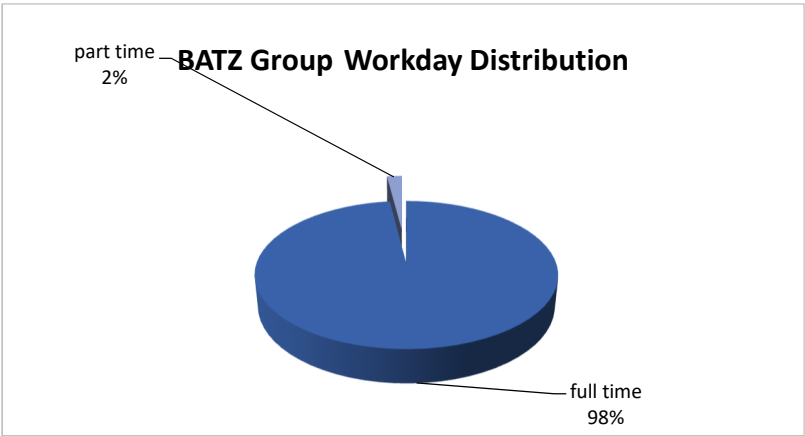
BATZ Group Hiring Typology



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 10.84 years at the close of 2023 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 43.62.



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 2023.

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.

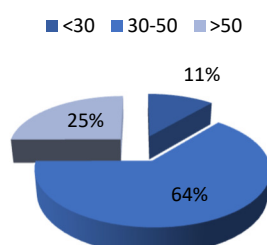
Insofar as turn over, specifically in the scenario we are in where retaining, recruiting and attracting talent has become one of the key levers in the policies and practices regarding managing people and where labour competition for recruiting talent is becoming tougher and tougher, following this indicator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

Consequently, 2023 ended with an indicator of 10.4%. 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.

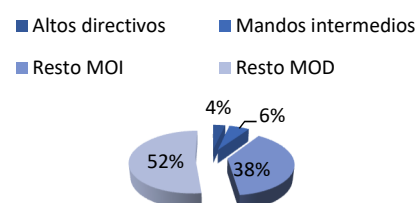
Number of terminations	2023	2022
By gender		
Women	4	72
Men	36	104
By age group		
Under 30	17	23
Between 30 and 50	18	148
Over 50	5	5

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. The table of remuneration itemised by the main variables is shown below:

BATZ Group 2023 Employee Distribution by Age



BATZ Group 2022 Employee Distribution by Professional Category



Remuneration by plant	Igorre	Zamudio	Czech Republic	Mexico	Kunshan	Guangzhou
By gender						
Women	€31,940	€31,600	€17,390	€12,187	€20,847	€17,504
Men	€29,276	€33,800	€13,496	€7,461	€17,216	€10,736
By age group						
Under 30	€29,712	€24,100	€12,415	€6,886	€16,231	€11,476
Between 30 and 50	€30,540	€30,800	€12,392	€13,350	€19,478	€17,120
Over 50	€33,512	€34,800	€15,187	€11,532	*	€4,046
By professional classification						
Managerial Positions	€61,454	€74,000	€37,485	€37,086	*	
Middle Management	€39,249	€46,700	€21,580	€15,713	€51,305	
Rest MOI	€32,532	€37,800	€20,880	€9,720	€19,737	€14,882
Rest MOD	€28,563	€25,100	€10,469	€6,081	€13,316	€12,977

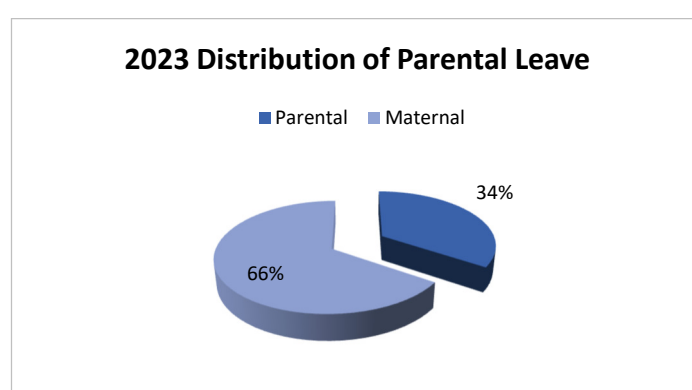
* The Kunshan figures for management positions and employees over 50 are not shown to ensure the protection of personal data

6.2 WORK ORGANISATION

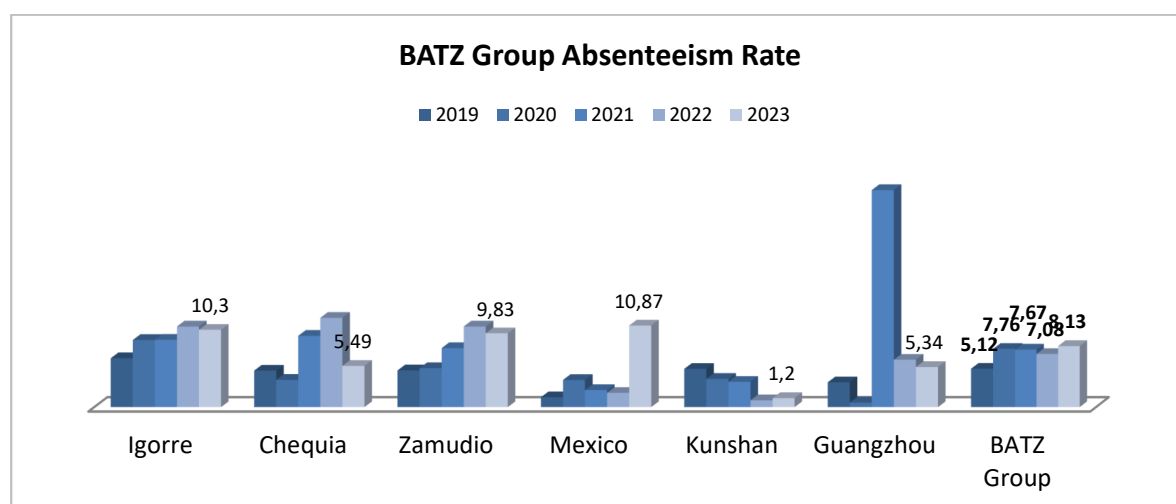
No. 22 - Traceability table in compliance with the Non-Financial Information and Diversity law

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 2023 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 2023 (8.13%) lower than the previous year. There were 167,206 hours of absenteeism (missed hours)



Formula for calculation: % absenteeism * number of NON productive hours / total hours worked (also including leaves of absence, licenses and parental leave...)

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.

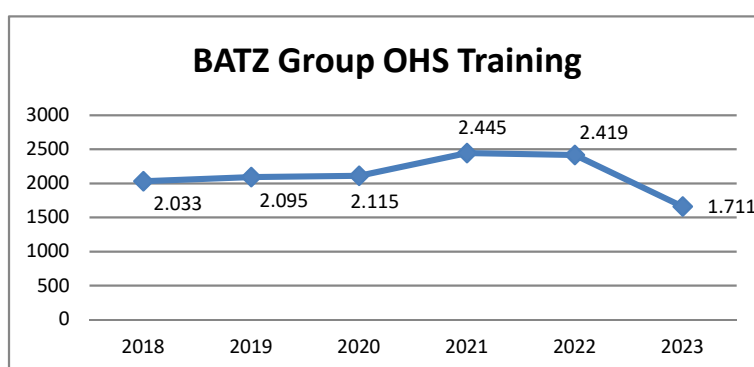
No. 21 - Traceability table in compliance with the Non-Financial Information and Diversity law

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 2023 there were six people with disabilities working in the group. Work is often subcontracted to companies of disable people, like Lantegi Batuak.

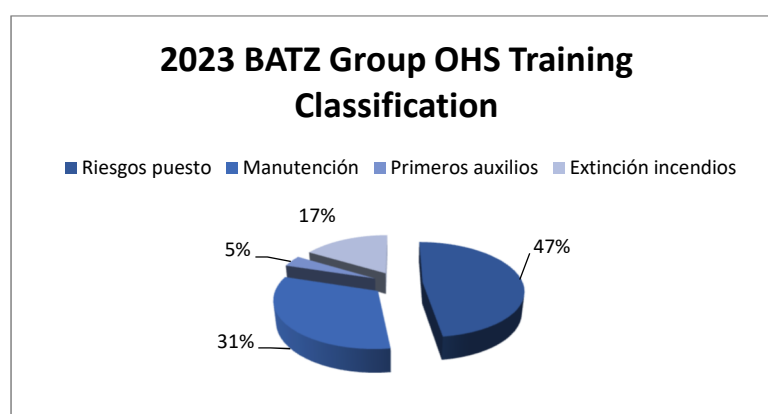
6.3 OCCUPATIONAL HEALTH AND SAFETY

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

In 2023, and despite the dedication, efforts and resources destined to managing COVID-19, 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 2023 we gave a total of 1,711 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.



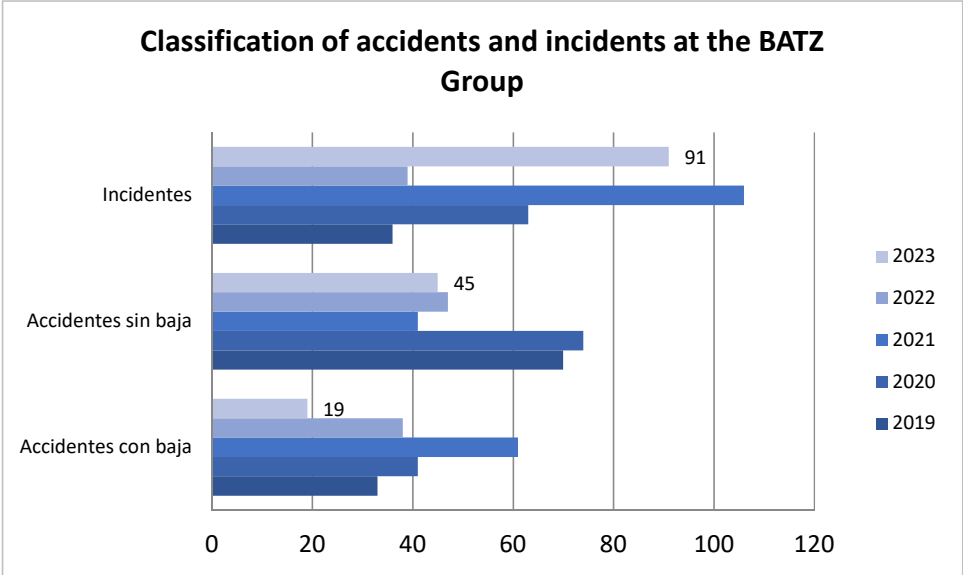
At BATZ we facilitate and ensure the performance of the tasks and activities of all the people who make up the company in a safe environment, verifying that all prevention, safety and ergonomic requirements are met, and offering the necessary training and methodology for the correct performance of our 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

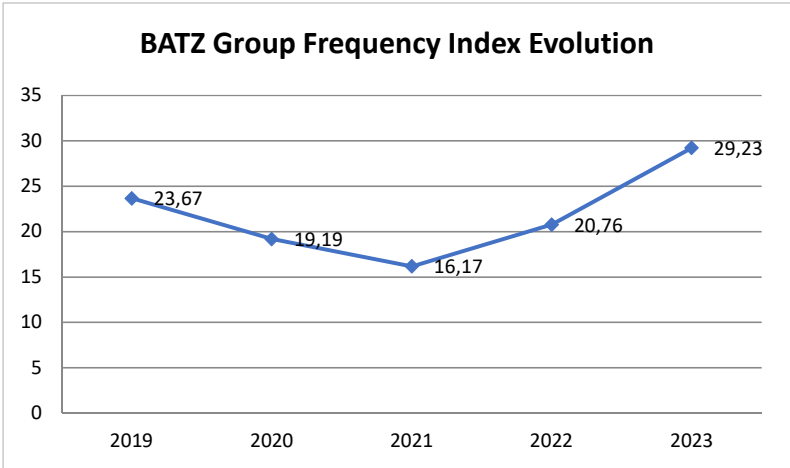
introduction of technologies that generate previously non-existent risks, or that amplify existing ones. The OHSC will report on any other action that may have substantial effects on the safety and health of workers.

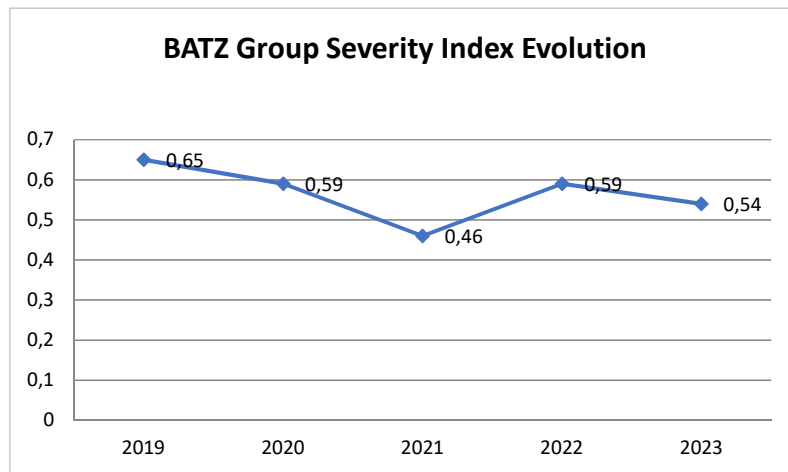
Insofar as the indicators regarding accidentality, a summary chart is included below with the evolution of accidentality by type of event.

Classification of accidents and incidents at the Batz Group



Evolution of the range of indices at the BATZ Group





(*) calculation of indicators

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

Incident index = (No. accidents during working hours with sick leave / No. of 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.

Institutional domain

Corporate Intranet
Newsletter
Audiovisual media in communal areas
BatzZmobile Platform (BATZ Zamudio)
Notice board
Information kiosk (BATZ Mexicana)
Email

Executive and management domain

Collaborators Meeting
Meetings with the chain of command
Induction plan
Satisfaction survey
Command-collaborator office
Performance Assessment
Daily Kaizen meetings
Regular management systems committees

The cooperative's own channels

General Assembly
Informative sessions
Tips

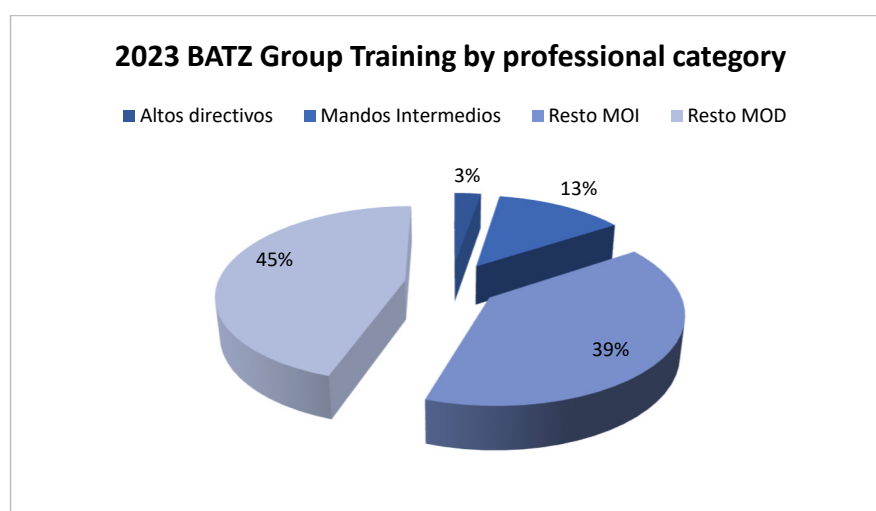
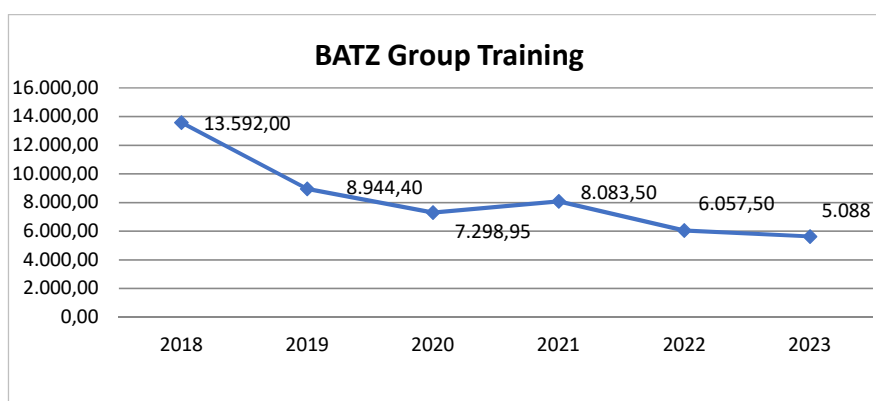
100% of our plants comply with the applicable laws in every country. Insofar as the cooperatives, because of their idiosyncrasies we do not have collective bargaining agreements, instead we have internal statutes and regulations that comply with the laws that apply to us and in many cases we improve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

6.5 EDUCATION

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

In a dynamic environment like the motor 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.



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 aimed at training in this area in the last four years.



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 2023 was 10.7% calculated using the ratio of base the base salary and the remuneration of women compared with men, as indicated in the formula shown below.

$$(M-F) / M \times 100\%$$

M Average hourly pay rate men
F Average hourly pay rate 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 16.7%) and nationwide (also around 18.4%). INE, latest data available 2021).

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

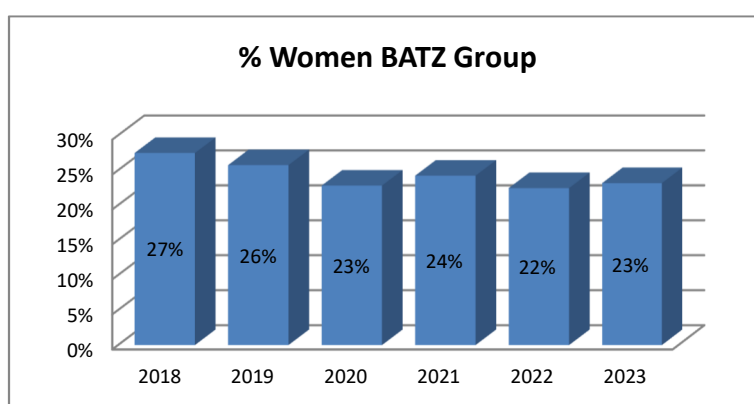
We are a project that was born as a cooperative and currently has a worldwide presence and a multicultural nature. It is a global group, in which there is room for diversity in the people who make up the group. In accordance with the above, and as stated in our Code of Conduct, we expressly undertake 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.

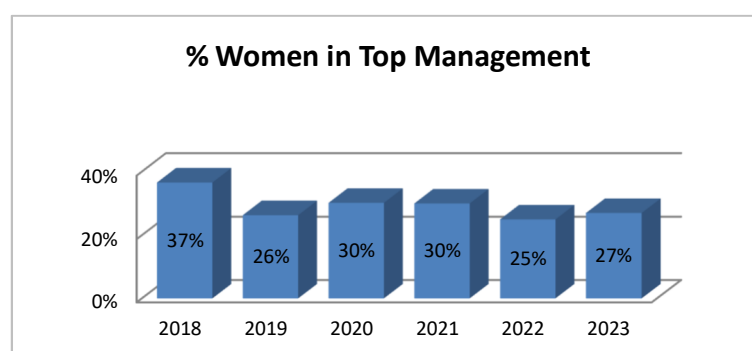
We also have a Protocol against sexual and gender-based harassment, which was renewed in 2022, which includes procedures and resources for the prevention and response, where appropriate, to possible cases of sexual or gender-based harassment that may occur at BATZ.

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 23.16%, a higher percentage than the previous year.



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 27%.



(*) 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

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 2021 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.

In 2023, two notifications of complaints were received, but both were analysed and consequently archived.

Insofar as the ethical channel, for 2024 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 dependents.

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.

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.

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

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.

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 the 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 counterfeit parts

The BATZ Group develops, implements and maintains effective methods and appropriate processes for its products to reduce to a minimum the risk of using counterfeit 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 2023, 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. All of those 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>	<ul style="list-style-type: none"> We support and promote initiatives related with sport and culture through sponsoring and organising sport and cultural activities. Baserri Antzoki - Promoting Basque culture Basque House (Kunshan)
<i>Commitment to a healthy work-life balance</i>	<ul style="list-style-type: none"> 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 Denbora Sarea and the Fundación Novia Salcedo, among others. Ladies Working Day (Kunshan)
<i>Commitment to social and labour integration</i>	<ul style="list-style-type: none"> Mundukide DYA Fórmula Student Fundación Aladina Asociación Desarrollo Comunitario Gazteleku Asociación Dislexia Dislebi Asociación esclerosis múltiple Bizkaia Adembi Fundación Kukumiku ARRAB Pensioner's Association Politeknika Txorierri - Education Centre
<i>Commitment to local development</i>	<ul style="list-style-type: none"> Fundación Errota
<i>Commitment to the Basque language</i>	<ul style="list-style-type: none"> 29 Nov - 1 Dec GAITU Marathon - 84 participants, 540 recordings in Basque Managed by EUSKARA BATZORDE BAI EUSKARARI ELKARTEA INDEUS
<i>Other initiatives</i>	<ul style="list-style-type: none"> We participated in Kilometron 2023 (Mexico), a track and field race organised by several companies to raise funds to donate to an NGO. This year the donation was to the "Ezequiel Hernández Romo" institute for the blind and visually impaired. We participated in the job fair of the technological institute of the state of San Luis Potosi, Mexico, and the cities in it. We organised and participated in the 1st edition of the 2023 Operactiva job fair in collaboration with the national employment service in Mexico. We organised and participated in the reforestation of the Cañada de Lobo, a dam near San Luis Potosi, Mexico. We organised and participated in the 2023 job fair at the Tres Naciones industrial park in Mexico.

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	
	<ul style="list-style-type: none">• IHOBE• BASQUE ECODESIGN CENTER• AIC• APD• CEBEK• CRE100DO• HEGAN (BASQUE AEROSPACE CLUSTER)• ERKIDE• BAI EUSKARARI ELKARTEA• Fundación ERROTA• 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 those lines, in addition to participating in trade shows and employment forums, 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'23	Úřad práce (Labor Authority)
May 23	Arratia Job Fair (Errota Fundazioa)
Sep'23	Vysoká škola báňská TU (university)
Sep'23	EusGara (Errota Fundazioa)
Sep'23	BATZ 60th anniversary social event
Oct' 23	Formula Student - Car presentation
Oct' 23	BATZ 60th anniversary institutional celebration

Contributions to foundations and non-profit entities

CONTRIBUTIONS	
<i>The Walk On Project Foundation</i>	€1,761
<i>Association for People with Mental Illness and their Family Members of Biscay - AVIFES</i>	€6,000
<i>Humanitarian sea rescue association - Aitamari</i>	€6,000
<i>Basque association of disabled people - Bidaideak</i>	€6,000
<i>Segunda Oportunidad homeless animal association</i>	€2,000
<i>Lorreine music association</i>	€2,000
<i>Indautxu Loyola Club</i>	€4,000
<i>Bilbao BSR Fundazioa</i>	€6,000
<i>Salesianos Deusto sports club</i>	€4,000
<i>Plataforma Tirante Teatro y Danza Erandio holistic association</i>	€2,000
<i>Asociación Desarrollo Comunitario "Gazteleku"</i>	€6,000
<i>Norte Elkarte sports promotion for integration equality and future of Bilbao</i>	€4,000
<i>Getxo Rugby Taldea</i>	€4,000
<i>ADEMBI multiple sclerosis association of Biscay</i>	€6,000
<i>S.C.D. DOSA Salesianos</i>	€4,000
<i>Biscay Parkinson's association - Asparbi</i>	€6,000
<i>Dislebi dyslexia association</i>	€6,000
<i>Irutasun Dantzari Taldea association</i>	€2,000
<i>Munguia Saskibaloia Kluba</i>	€4,000
<i>Urdaneta Agustinos sports club</i>	€4,000
<i>Gureak animal association</i>	€2,000
<i>Soinu Haizean association</i>	€2,000
<i>Nuestro Club free-time association</i>	€2,000
<i>Fundación Kukumiku</i>	€6,000
<i>San Miguelekoak Eskaut Taldea</i>	€2,000
<i>Motsukora manga, animé and Japanese culture</i>	€2,000
<i>Bidegintza for promoting personal and community development</i>	€6,000
<i>Pasqual Margall foundation</i>	€6,000
<i>Fundación Aladina</i>	€6,000
<i>Universitario Bilbao Rugby</i>	€4,000
<i>Basque House</i>	€2,240
<i>Juan H Sanchez Hospital</i>	€771

X. OUTSOURCING AND SUPPLIERS

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

Global supplier management is done with the BATZ supplier website, which is a module of the common tool for managing and evaluating suppliers for all the companies in the BATZ Group.

Additionally, and locally, every production plant has a close relationship with the suppliers in their area that is based on trust and commitment.

Furthermore, every plant evaluates the quality performance of their suppliers effectively and consistently using an audit process (annual plan), and guarantees that the supply chain meets the client's requirements and local and international legal and regulatory standards. The results of the audits have generally been satisfactory.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY AND GOOD GOVERNANCE

In 2023 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.

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" (CMRT) 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 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 2023

One of the main lines of activity in 2023 was that we started with the process of evaluating suppliers regarding sustainability requirements. We hired the NQC/SUPPLIER ASSURANCE for those ends, and we gave a higher priority to suppliers with a higher purchasing volume.

Lastly, in 2023, 10 suppliers were evaluated (with the highest purchasing %), and now we are in the process of analysing the data and results.

Along those lines, in 2023 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.

All the BATZ Group production plants have a quality management system, and they have the international certifications required by their clients. The certifications comply with IATF 16949 and every client's specific requirements.

To ensure and evaluate the effectiveness of our quality system, in addition to client audits, the BATZ Group has a continuous auditing programme in which we evaluate the systems, processes, and products with a constant focus on continuous improvement.

Nevertheless, incidents sometimes arise with clients. When that happens, predefined mechanisms and standards for the automotive industry are activated to provide a suitable response and take containment measures and implement systematic actions to eradicate the problems using our various client's platforms.

One of the main indicators with which we measure the number of our client incidents is the Ipb indicator, and we have the following figures for the BATZ Group:

$Ipb = \frac{\Sigma \text{ yearly client complaints (nº)}}{\Sigma \text{ yearly parts sent to clients (nº)}} \times 10^9$	Year	2,022	2,023
	Ipb	4976.10	5048.18

We can say that all the incidents have been analysed, implemented and closed following our clients' standards.

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 853,260 thousand euros in 2023.

PUBLIC SUBSIDIES

The non-refundable grants amounted to 686,291 thousand euros in 2023.

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



CONTACT INFORMATION

HEADQUARTERS

Torrea Auzoa, 2.
48140 Igorre – Bizkaia – Spain
Tel.: +34 94 630 50 00
batz@batz.com

See our other locations [here](#)

XIII. TAXONOMY

After the activity that matches the taxonomy has been identified, the financial information for calculating the key business volume, CapEx and OpEx indicators is identified. The activity deemed eligible under the taxonomy contributes to mitigating climate change.

TAXONOMY	Proportion of eligible and aligned economic activities	Proportion of ineligible and non-aligned economic activities	Proportion of non-eligible economic activities
Business volume	19%	81%	0%
Capital expenses (CapEx)	23%	77%	0%
Operating expenses (OpEx)	19%	81%	0%

The key indicator referred to business volume is specified in (EU) delegated regulation 2021/2178 as the proportion of income derived from activities that match the taxonomy (numerator) over the group's total income (denominator), in accordance with International Accounting Standard (IAS) 1, paragraph 82 (letter a), adopted by (EC) regulation no.1126/2008 of the commission.

The numerator of the indicator for CapEx was obtained by identifying the eligible activities that meet the alignment requirements, to subsequently consolidate the values of the investments in them. Additions to tangible and intangible assets before amortizations and possible new valuations were included in the denominator.

For OpEx, the indicator represents the proportion of operating expenses specified in the regulation for activities that match the taxonomy (numerator) over the total taxonomic OpEx (denominator), understood as direct non-capitalised costs that are related with research and development, building renovations, short-term leases, maintenance and repairs, and other direct expenses related with the daily maintenance of property, plant and equipment.

XIV. NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY				
AREAS	Contents	No.	GRI Standards	GRI description
Global	<p>The consolidated non-financial information statement shall include the information necessary to understand:</p> <ul style="list-style-type: none"> * evolution * results and the group's situation and * the impact of its activities, at least: <ul style="list-style-type: none"> * environmental issues * social issues * respecting human rights * the fight against corruption and bribery * 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 access. 	---		
Business model	<p>Brief description of the business model of the group, including:</p> <ol style="list-style-type: none"> 1.) their business environment, 2.) their organisation and structure, 3.) the markets they operate in, 4.) their goals and strategies, 5.) 5) the main factors and trends that can affect its future evolution 	1	2-1 2-6 2-1 2-1 2-6 2-6 2-7 2-22	Company name Activities, brands, products and services Location of the headquarters Location of the operations Markets served Size of the organisation Statement by senior executive decision-makers
Policies	<p>A description of the policies the group applies regarding those issues, which will include:</p> <ol style="list-style-type: none"> 1) The due diligence procedures used for identifying, evaluating, preventing and attenuating risks and significant impacts 2) Verification and monitoring procedures including what measures have been adopted 	2	3-3	<p>For the management focus <u>in every area, which internal policies they have will need to be highlighted</u></p>

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	No.	GRI Standards	GRI description
Policy outcomes KPIs	<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 evaluating progress and</p> <p>2) that encourages comparability between companies and sectors in accordance with domestic, European and international reference frameworks used for each issue</p>	3	3-3	Management focus in every area
Risks in short, medium and long term	<p>These are 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 the risks</p> <p>* explaining the procedures used to detect them and evaluate them in accordance with domestic, European and international reference frameworks 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	2-12	Main impacts, risks and opportunities
			2-25	
			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
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>* The key non-financial results indicators must be applied to each section of the non-financial information statement.</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	No GRI	Statement of preparation of the report in accordance with the GRI Standards

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	No.	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.) The <u>resources dedicated to preventing environmental risks</u> 3.) Using the <u>precautionary principle</u> , the amount of <u>provisions and guarantees for environmental risks</u>	6	3-3 2-23	Management focus in <u>every area</u>
			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	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	3-3	Effluent and waste management approach// Circular economy

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	No.	GRI Standards	GRI description
	Waste: Measures for prevention, recycling, reuse, other forms of recovering and eliminating waste Actions to combat food waste.		301-2	Recycled supplies
			301-3	Reused products and packaging materials
			3-3	Effluent and waste management approach
			306-2	Waste by type and disposal method
			3-3	Effluent and waste management approach//Food waste
	Sustainable use of the resources			
	Water <u>consumption</u> and water supply in <u>depending on local limitations</u>	9	303-1	Water extraction 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	3-3	Materials Management Approach
			301-1	Materials used by weight or volume.
			301-2	Recycled supplies
	Direct and indirect energy <u>consumption</u> , measures taken to improve <u>energy efficiency and the use of renewable energies</u>	11	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	3-3 2-23	Emissions management approach
			305-1	Direct GHG emissions (Scope 1)

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	No.	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
	3-3 2-23		Emissions management approach		
	201-2		Financial implications and other risks and opportunities arising from climate change		
	3-3 2-23		Emissions management approach		
	305-5		Reduction of GHG emissions		
	The <u>measures adopted to adapt to the consequences of climate change:</u>				
	Voluntary reduction targets set for the medium and long term to reduce greenhouse gas emissions and the measures implemented to achieve them.				
	Protection of biodiversity				
<u>Measures taken to preserve or restore biodiversity:</u>	13	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	
		304-2		Significant impacts of the activities, products and services on biodiversity	
<u>Impacts</u> caused by activities or operation in protected areas					
Social and employee issues	Employment				
	<u>Total number</u> and distribution of <u>employees by gender, age, country and professional classification:</u>	14	3-3 2-23		Employment Management Approach
			2-7		Information on employees and other workers
			405-1		Diversity in governing and employee bodies
	<u>Total number</u> and distribution of <u>kinds of labour contracts</u>	15	2-7		Information on employees and other workers
	<u>Yearly average</u> of <u>permanent contracts, temporary contracts and</u>	16	2-7		Information on employees and other workers

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	No.	GRI Standards	GRI description
	part-time contracts by gender, age and professional classification	17	405-1	Diversity in governing and employee bodies
	Number of worker terminations by gender, age and professional classification		401-1	New employee recruitment and staff turnover
	Average salaries and their variation broken down by gender, age and occupational classification or equal value		405-2	Ratio of basic salary and remuneration of women compared to men
	Salary gap , remuneration for equal job titles or societal averages	18	3-3 2-23	Employment + Diversity and Equal Opportunities
			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	3-3 2-23	Diversity and Equality management approach - giving average remuneration values for Directors by gender
			2-19	Governance: Remuneration policies
			2-20	Governance: Processes for determining remuneration
			2-21	Governance: Ratio of total annual compensation
			2-21	Governance: ratio of percentual increase of total annual compensation
	Implementation of right to disconnect policies	20	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	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 <u>healthy work-life balance and encouraging co-parental practice</u> of it by both parents		3-3	Employment Management Approach
	Occupational health & safety			
	Health and safety conditions at work	23	3-3 2-23	Occupational Health and Safety Management Approach

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	No.	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
	<u>Occupational diseases</u> : itemised by gender		403-3	Workers with a high incidence or high risk of activity-related illnesses
	Labour relations			
	Organisation of the <u>social dialogue</u> , including procedures for notifying and consulting staff and negotiating with them	24	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		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	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	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
	<u>Equality plans</u> (chapter III of Spanish organic law 3/2007 of 22 march for the effective equality of men and women), <u>measures adopted to promote employment, sexual or gender based harassment protocols</u> , and the integration of and universal accessibility for people with disabilities			
	The policy against all kinds of discrimination and, where appropriate, diversity management			

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	No.	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	3-3 2-23 2-27	Evaluation of human rights + Freedom of association and collective bargaining + Child labour + Forced or compulsory labour Management Approach
			2-23	Values, principles, standards and norms of conduct
			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
	<u>Indictments</u> for cases of human rights violations	29	406-1	Cases of discrimination and remedial action taken
	<u>Promoting and complying</u> with the provisions of the fundamental <u>conventions of the International Labour Organisation</u> related with respecting free association and the right to collective bargaining		407-1	Operations and suppliers whose right to freedom of association and collective bargaining may be at risk
	<u>Eliminating employment and job discrimination</u>		3-3 2-23	Non-Discrimination Management Approach
			406-1	Cases of discrimination and remedial action taken
	<u>The elimination of forced or obligatory labour</u>		409-1	Operations and suppliers with a significant risk of cases of forced or compulsory labour
	<u>The effective abolition of child labour</u>		408-1	Operations and suppliers with a significant risk of child labour cases
Corruption and Bribery	<u>Measures</u> adopted to <u>prevent</u> corruption and bribery	30	3-3 2-23 2-27	Anti-Corruption Management Approach
			2-23	Values, principles, standards and norms of conduct
			2-16 2-26	Advisory mechanisms and ethical concerns
			205-1	Operations assessed for corruption-related risks

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	No.	GRI Standards	GRI description
			205-2	Communication and training on anti-corruption policies and procedures
			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	The company's commitments to sustainable development			
	The impact of the company's activities on <u>employment and local development</u>	31	3-3	Local Community + Indirect Economic Impact Management Approach
			2-23	
			203-1	Investments in infrastructure and supported services.
			203-2	Significant indirect economic impacts
	The impact of the company's activities on <u>local populations and the region</u>		413-1	Operations with local community participation, impact assessments and development programmes
			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
	Relationships with local community actors and the modalities of the dialogue with them		413-2	Operations with significant – real or potential – negative impacts on local communities
			2-29	Approaches to stakeholder engagement
	Membership or <u>sponsorship activities</u>		413-1	Operations with local community participation, impact assessments and development programmes
			2-28	Membership in associations

NON-FINANCIAL REPORTING AND DIVERSITY LAW COMPLIANCE TRACEABILITY

AREAS	Contents	No.	GRI Standards	GRI description
	Subcontracting and suppliers			
	* Social, gender equality and environmental issues included in the purchasing policy * Social and environmental responsibility considered in relationships with suppliers and subcontractors	32	2-6	Supply chain
			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		3-3 2-23	Procurement practices management approach
	Consumers			
	Assessment of the health and safety impacts of product and service categories	33	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		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 Tax on profits paid	34	3-3 2-23	Economic performance management focus + quantitative tax and profit data
	Public subsidies received		201-4	Financial assistance received from government

XV. INDEPENDENT VERIFICATION

DECLARATION OF VERIFICATION



Independent Verification Statement on the Non-Financial Information Statement of BATZ, S. COOP. and Subsidiaries for the year 2023

To the Partners/managing board of **BATZ, S.COOP.**

In accordance with Article 49 of the Spanish Commercial Code, we have audited, on a limited assurance basis, the Non-Financial Information Statement (hereinafter "NFIS") of **BATZ, S. COOP.** (hereinafter "the organisation") and its subsidiaries for the year ended **31 December 2023**, which forms part of its **consolidated Directors' Report** for the same year.

The contents of the **consolidated Directors' Report** include additional information to that required by current commercial regulations on non-financial information, which has not been included in our verification work. In this respect, our work has been limited exclusively to verifying the information detailed in **Section XIV "Traceability of compliance with the law on non-financial information and diversity"** of the aforementioned Statement of Non-Financial Information.

Management Responsibility

The organisation's management is responsible for preparing, producing and presenting the NFIS in accordance with Law 11/2018 of 28 December 2018. This responsibility includes designing, implementing and monitoring the internal controls deemed necessary to ensure the NFIS is free from material misstatements. The NFIS has been produced in accordance with the contents set out in the current commercial regulations, selected in accordance with the provisions for each subject in **Section XIV "Traceability of compliance with the law on non-financial information and diversity"** of the aforementioned NFIS.

In addition, the organisation's management is responsible for defining, implementing, adapting and maintaining the management systems used to obtain the necessary information to prepare the NFIS, as well as for monitoring the degree of compliance with the requirements of Law 11/2018 of 28 December 2018.

Independence and Competence

The audit team has complied with the requirements of independence, impartiality and other ethical requirements, basing its actions on the fundamental principles of integrity, objectivity, competence and professional diligence, confidentiality and professional conduct.

EQA is an independent verification service provider in accordance with Law 11/2018.

Number: 12004

Date of Verification: **01 / 04 / 2024**

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Objective of the verification

The objective of the verification is to ensure that the information reported by the organisation in the Non-Financial Information Statement of **BATZ, S. COOP.** of **22/03/2024** is accurate, complete, transparent and free of errors or omissions.

Our responsibility

EQA's responsibility is limited to expressing our conclusions in an independent verification statement with a limited security scope, based on the procedures conducted and the evidence obtained. The assignment has been carried out in accordance with our own methodology and the requirements of the International Standard UNE-EN ISO/IEC 17029 "Conformity assessment. General principles and requirements for validation and verification bodies".

The scope of a limited security assignment is substantially less than that of a reasonable security assignment and therefore less security is provided.

The procedures conducted are based on the professional judgement of the experts involved in the process and include consultations, observation of processes, evaluation of documentation, analytical procedures, and sample review tests, which are described below:

- ✓ Conducting meetings with the staff of the various departments of the Organisation involved to learn about the business model, the policies and management approaches applied, the main risks related to these issues, as well as to obtain information necessary for the review.
- ✓ Checking the processes available to the organisation to determine what the material aspects are in relation to its activities.
- ✓ Analysing the procedures used to collect and validate the data and information presented in the NFIS.
- ✓ Analysing how the NFIS complies with the provisions of Law 11/2018.
- ✓ Verifying data based on the selection of a sample and conducting substantive testing of the quantitative and qualitative information contained in the NFIS.

Number: 12004

Date of Verification: 01 / 04 / 2024

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Conclusions of the Verification

As a result of the procedures conducted and the evidence obtained, no issues have come to our attention that would lead us to believe that the information contained in the NFIS of **BATZ, S. COOP. and its subsidiaries** for the year ended **31/12/2023** is not presented appropriately, nor that there are any material deviations or omissions that would lead us to believe that the report does not comply with the requirements of Law 11 of 2018 set out in **Section XIV "Traceability of compliance with the law on non-financial information and diversity"** of the aforementioned NFIS.

Use and distribution

This Declaration of Verification is issued to the address of **BATZ, S. COOP.** in accordance with the terms of the contract signed between both parties.

This statement has been prepared in response to a requirement under Spanish corporate law and may not be suitable for other purposes and jurisdictions.



Esperanza Martínez Garola
Certification Director

Number: 12004

Date of Verification: 01 / 04 / 2024

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