



Non-financial information report.

UBE Corporation Europe, S.A.U.
Fiscal year 2024 / 1.4.2024 - 31.3.2025

UBE

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1. LETTER FROM THE PRESIDENT

[2.22 / 2.23 / 2.24]

Castellon, May 31st, 2025.

UBE Corporation Europe is a global company that forms part of the century-old Japanese UBE Group. Operating from within the European Union, we navigate an environment shaped by political, technological, socio-economic, and strategic challenges to which we continuously adapt—guided by our commitment to coexistence and mutual prosperity with society, the founding motto of UBE since 1897.

Within the references set by our activity in the chemical sector, we move forward with the aim of continuing to promote the manufacturing technologies that the UBE Group has cultivated throughout its history, in order to create the value required by society, in a safe and environmentally friendly way, and make it available to people, thereby helping to solve global environmental problems¹.

A year ago, in its April declaration, the European Council called for a resolute defence of competitiveness, prosperity, and strategic sovereignty. In February of this year, the Commission issued a communication entitled "*A Simpler and Faster Europe*", presenting the Omnibus proposal with the aim of strengthening competitiveness, facilitating the implementation of new rules arising from the European Green Deal, simplifying regulations, and reducing the administrative burden on companies. This proposal was endorsed by the European Parliament on April 3rd. UBE Corporation Europe will closely follow the evolution of these regulations and the applicable requirements in order to comply with them responsibly and continue to inform our stakeholders.

In accordance with our company philosophy, we continue to be guided by transparency and dia-



logue in our activities and have therefore prepared the Non-Financial Information Report for the financial year 2024, which covers the period 1 April 2024 - 31 March 2025, where we present in a relevant, comparable and verifiable manner, the policies, activities and progress in the material issues of the environmental, social and governance areas, related to our business management, thus complying with Law 11/2018 of 28 December, in accordance with the GRI Standards (Global Reporting Initiative) methodology for sustainability reports.

(1) <https://www.ube.com/ube/en/corporate/management/vision/>

Commitments and policies

During 2024 we completed the drafting of the **Environmental Sustainability Master Plan**, activating some working groups for its development, and updated the **Environmental Sustainability Policy**, which contains UBE Corporation Europe's commitments to combat and adapt to climate change, promote the transition to a circular economy, protect the water resources of the environment and its value chain, eliminate or minimise emissions into the environment, contribute to the conservation of biodiversity, promote environmental sustainability in its products and value chain and develop a business model based on an investment strategy that takes into account respect for the environment and the criteria of the European green taxonomy. Along these lines, last December saw the renewal of the UBE chair in sustainable plastics at the Univesity Jaume I in Castellon.

In the social area, the start-up of the Market Intelligence unit, within the Business Area, and the integration of the Repol and UCE work teams represent an important step towards an agile management of human resources, focusing on training, knowledge sharing and responsibility, as a basis for personal development, risk minimisation and improvement of the working environment and safety.

Our long-term economic sustainability depends on our ability to continuously meet the needs of our customers by fulfilling their technical and quality requirements and specifications. In addition, we are committed to offering more and more products oriented towards circular economy models.

We are moving forward on this path with a medium-term vision, focusing on identifying raw materials of renewable origin. This includes innovation projects in the new bio-based polymer pilot plant

and the development of proprietary materials incorporating certified recycled content. By March 2025, we have six such references.

Throughout 2024, we have taken a number of strategic positions:

In July, the acquisition of a minority stake in the capital of **Sampo GmbH**, an Austrian company specialising in the production of thermoplastic polyurethane, with which we have entered into a technological and commercial partnership.

In October, **UBE Corporation** announced the agreement for the acquisition of **Lanxess Urethane Systems**², whose activities in Europe will be incorporated into UBE Corporation Europe. The acquisition was executed on 1 April 2025.

Last December we acquired a majority stake in **Manufacturas Paulowsky**³, a Spanish manufacturer of post-consumer recycled plastics located in Riba-roja (Valencia), with whom we had previously collaborated.

Finally, last January, **UBE Corporation** communicated from Japan⁴ the decision to carry out structural reform measures in several countries in the Group's core businesses to promote sustainability and move towards carbon neutrality, including the future cessation of the production of cyclohexanone, 1.6-hexanediol and 1.5-pentanediol at the El Serrallo plant, once the necessary coordination with customers and other affected parties has been completed. Both decisions were previously considered and analysed and will allow us to move forward in line with the expectations of the chemical sector for a more sustainable Europe.

Financially, 2024 has been a year of transition where, despite the great efforts of all the subsidiaries and departments that make up UBE Corporation Europe, results have been penalised by the

(2) [Notice Regarding Acquisition of LANXESS Urethane Systems Business](#)

(3) <https://www.ube.com/ube/en/news/2024/1220.html>

(4) <https://ssl4.eir-parts.net/doc/4208/tdnet/2552088/00.pdf>

geopolitical environment, the weakness of some markets and the costs related to the restructuring mentioned in the previous paragraph. At the time of writing, we believe that the foundations are in place to return to profitability in 2025 and continue to move forward. All this while maintaining the solid levels of labor safety, project execution and investments aimed at guaranteeing the integrity of the assets, achieved in recent years: UCE has gone more than three years without any accident involving a sick leave of its own personnel, and in recent years has maintained a high level of investments, included in the capital budgets of the *Mid Term Plan*, for innovation, improvement and maintenance of the production plant.

You will find in the next chapter of the report a wealth of details about the company, its structure, activities, management policies and strategy. This is followed by the determination of the material issues table, and the sections on environmental, labour, governance and societal

information. Our parent company regularly publishes in English a comprehensive sustainability report and other documents that will allow you to learn about and appreciate the efforts that the UBE Group as a whole, centred around the development and manufacture of specialty chemicals, is making in its quest to be a major player in our society, transforming today the future that we will be facing tomorrow.



José Ignacio Iglesias
President





2. INTRODUCTION

2.1 BUSINESS ENVIRONMENT AND ECONOMIC PERFORMANCE

[2.1 / 2.2 / 2.22 / 201.1 / 413.2]

UBE Corporation Europe S.A. Unipersonal (or UCE hereinafter) is a group of companies dedicated to the production and distribution of value-added chemical products and the creation of technological and sustainable solutions to meet the demands of industry and market trends. It is present in Europe and Latin America through delegations and offices in Castellon and Almazora (Spain), Düsseldorf (Germany), Sao Paulo (Brazil) and Mexico City (Mexico) and is integrated in the Japanese group **UBE Corporation**, which is its sole shareholder. The headquarters are located in the municipality of Castello de la Plana (Spain), in the industrial estate El Serrallo s/n, 4 km from the city centre, 2 km from the Grao and 5 km from the centre of Almassora.

The consolidated group comprises **UBE Corporation Europe S.A. Unipersonal**⁵ as parent company, and the following subsidiaries:

- > UBE Europe GmbH (Germany) (UEG)
- > UBE Latin America Serviços Ltda (Brazil) (ULA)
- > UBE México S.R.L. de C.V. (Mexico) (UMEX)
- > Repol, S.L.U. (Almassora, Spain) (Repol)

This report includes indicators for all the aforementioned companies in the aspects of greatest direct relevance. However, the three subsidiaries located outside Spain operate as commercial delegations without industrial activity, so their environmental impact is not considered to have a significant effect on the report as a whole.

UCE acquired in July a minority and non-controlling stake in the Austrian company **Sampo GmbH**⁶, a producer of thermoplastic polyurethane, and in December a majority stake in **Manufacturas Paulowsky S.L.**⁷, a manufacturer of recycled plastics. Information on these companies will be integrated in the next non-financial reporting statement.

Key figures by country:

INCOME, ECONOMIC VALUE GENERATED, DISTRIBUTED & RETAINED	SPAIN		GERMANY		BRAZIL		MEXICO		
	(thousand €)	2023	2024	2023	2024	2023	2024	2023	2024
Consolidated income		467,007	510,544						
Revenue (turnover)		386,879	419,023	84,702	95,772	1,025	877	1,449	1,111
Economic Value Generated		386,879	419,023	84,702	95,772	1,025	877	1,449	1,111
Economic Value Distributed		379,772	423,744	83,853	93,975	1,002	887	1,431	1,075
Economic Value Retained		7,107	-4,721	849	1,797	23	-10	18	36

⁽⁵⁾ Throughout the report, **UCE** refers to **UBE Corporation Europe, S.A. Unipersonal**, and **UCE Group** to the consolidated group consisting of the five companies (UCE, UEG, ULA, UMEX and Repol).

⁽⁶⁾ **Sampo GmbH** located in Traboch (Austria) employed 15 people in 2024. Its annual production volume represents 1% or less of the consolidated total of the UCE Group.

⁽⁷⁾ **Manufacturas Paulowsky S.L.** located in Riba-roja (Valencia) had 18 employees in 2024. Its annual production volume represents less than 3% of the consolidated total of the UCE Group.



Aerial view of El Serrallo industrial estate and UBE Corporation Europe

UCE occupies a surface area of 300,000 m² and has a 17,000 m² plot in the Port of Castello for unloading and storage of raw materials under an administrative concession.

History

The company was set up in 1967 as Productos Químicos Esso S.A., with capital from the American company Esso Chemical and Banesto, when industrial development policies in Spain led to the construction of a caprolactam production company at the Castello petrochemical complex. After belonging to various industrial groups, it was acquired in 1994 by the Japanese group **UBE Corporation**, founded in 1897 in the city of Ube and currently listed on the *Prime Market* of the Tokyo Stock Exchange under the registration code 4208.



Headquartered in Tokyo, **UBE Group** manufactures a wide range of chemical products, from basic chemistry to advanced high performance materials. The product portfolio includes caprolactam, polyamides, ammonium sulfate, C1-type materials, *composites*, butadiene rubber, polyimides (for integrated circuit boards), gas separation membranes, electrolytes and separators for lithium-ion batteries, special ceramics and other fine chemicals for sustainable industrial applications. It has an active pharmaceutical ingredients (API) development and manufacturing division, and participations in the industrial machinery, cement and building materials sectors.

The business environment of El Serrallo industrial estate

The Association of Industries of El Serrallo, INDES, to which UCE belongs, includes eight companies from the industrial estate and the industrial area of Port Castello with production activities and services considered essential or strategic for society, such as waste management, electricity generation, manufacture of fuels, liquefied gases, chemical products, fertilizers, etc.



The study carried out in 2019 by the Institut Cerdà on these companies identified their relevant socio-economic contribution, as a pole of job creation and revitalisation of economic activity throughout the province and highlighted the high strategic interest of the complex in the economic field, and the desirability of greater information and transparency on the part of companies and public administrations regarding their activities and other aspects of environmental pollution, safety or mobility in the vicinity of the area. INDES as a whole generates more than 2,500 direct and indirect jobs, with a high level of qualification, having a favourable socio-economic impact on the province of Castellon. In order to study ways of improving the environmental impact of the El Serrallo industrial estate in the community, INDES is in regular contact with the Consellería de Medio Ambiente, Infraestructuras y Territorio, and the town councils of Almassora and Castello.

Integrated Environmental Authorization

UCE has an Integrated Environmental Authorization (AAI) in force, which is the legal instrument granted by public administrations to ensure compliance with integrated pollution prevention and control regulations for the operation of activities and facilities. This is in response to the Law on Integrated Pollution Prevention and Control in its revised text of Royal Legislative Decree 1/2016. The authorization includes all environmental aspects, and any other related aspects considered by the competent environmental authorities, in accordance with legislation, establishing the best available techniques applicable; emission limit values for pollutants; parameters and equivalent technical measures; prescriptions for soil and groundwater protection; waste management procedures and methods; systems and procedures for the treatment and control of emissions and waste; measures for operating conditions other than normal; conditions for assessing compliance with emission limit values and other aspects relating to the activity.

Based on the active management of the AAI, UBE Corporation Europe applies strategies and policies in the fields of innovation, investment, market development, management of human assets, contribution to the fight against climate change, etc., the main lines and results of which constitute the basis of communication with society. The company's general management and the Institutional Relations area carry out communication with the local community, based on criteria of transparency, proactivity and responsibility.

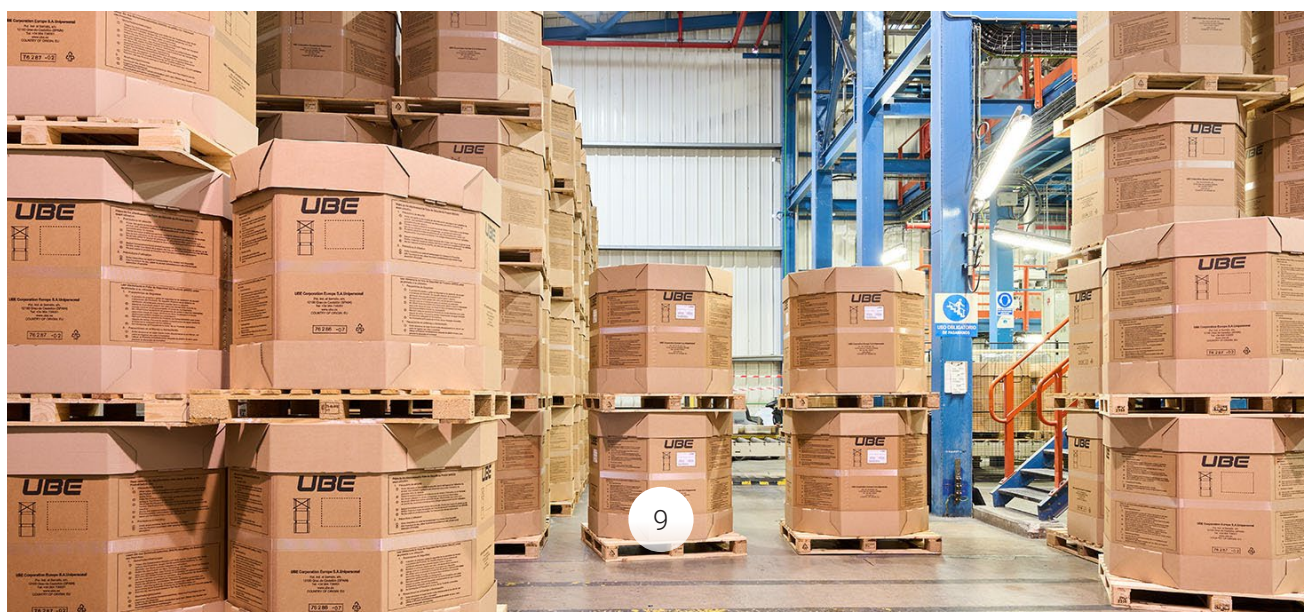
An update of the AAI was received in December 2024 to bring the plant in line with the EU standards contained in the BAT Conclusions on Best Available Techniques (BAT) in the large organic chemical industry (LVOC) and the BAT Conclusions for common systems for the treatment and management of waste water and waste gases in the chemical sector (CWW).

The **economic performance** of UBE Corporation Europe and its subsidiaries has the following positive socio-economic impacts:

- ▶ Growth and economic performance
- ▶ Productive investment in innovation
- ▶ Growth in markets and customers
- ▶ Talent management and retention
- ▶ Information transparency and accountability
- ▶ Supplier policy. Responsible supply chain management.
- ▶ Promoting local socio-economic development
- ▶ Partnerships with society and public administrations
- ▶ Community relations (sport, civic and solidarity organisations)

The following socio-economic impacts are considered potentially negative:

- ▶ Conditions caused by insufficient or inadequate human capital or its inadequate management, including loss of specialised knowledge.
- ▶ Conditions caused by regulatory non-compliance or supply chain problems (non-compliance or non-existence of suppliers of certain raw materials), which could lead to sanctions,



restriction of activities, reputational erosion, decline in sales, etc.

- ▶ Conditions caused by natural disasters or accidents that bring the activity to a standstill, affecting the value chain.
- ▶ Conditions caused by operational and/or business strategy errors that affect the business, including lack of success in technical or innovation projects, delay in investments, reduced competitiveness.
- ▶ Conditions arising from the adaptation of installations to new requirements regarding emissions, waste and water discharges, or from the correction of inadequate management, resulting in high costs or damage to third parties.

In order to respond to and manage the aforementioned aspects, the company has internal policies and **integrated management system** certifications (Management Policy, Carbon Neutrality Policy, Occupational Health Promotion Policy, Environmental Sustainability Policy; Major Accident Prevention Policy, UBE Action Guidelines, etc.).

The company has several communication channels and tools to analyse and incorporate the expectations of its main stakeholders in its plans and operations: customer consultations through the commercial areas; meetings with the workers committees; frequent dialogue with environmental supervisory bodies and local administrations; annual corporate risk assessment including possible impacts on the community and the environment; annual meeting with the local media, etc.

The **Mid Term Plan** is the internal tool that defines the business strategy, projects and investments, the organisation of resources and the main action plans to develop the policies and achieve the desired results. The management system is reviewed annually, analysing the results obtained and other social, environmental and governance aspects of the UCE Group's management.

2.2 ORGANISATION AND STRUCTURE OF THE COMPANY

[2.1 / 2.2 / 2.9 / 2.10 / 2.11 / 2.12 / 2.13 / 2.14 / 2.15 / 2.16 / 2.17 / 2.18 / 2.19 / 405.1]

UBE Corporation is the sole shareholder of UBE Corporation Europe and also acts as **sole director**, through the chairman of **UCE**, who is *the natural person representative* of the parent company. In UCE's subsidiaries, the governance model is adapted to the local jurisdictions and corporate forms of each company, with **UEG** (Germany), **ULA** (Brazil) and **UMEX** (Mexico) following a natural person director model, while **Repol** is a single-member limited liability company, with UBE Corporation Europe S.A.U. as the sole director and its chairman acting as the natural person representative in Repol. Each company grants powers of representation, with the scope of the powers granted corresponding to the list of authorizations in force in each company, in line with the internal control system established.

The President of UCE, who acts as the executive and representative of the legal entity (who is the sole director), establishes the organisation and delegation of functions and informs the sole director of any membership in organizations or companies that may represent a conflict of interest. On a second hierarchical level below the representative person of UBE Corporation are the presidents of the subsidiaries and the heads of the following units and areas:

Staff units under the presidency (3):

- ▶ Industrial Transformation;
- ▶ QHSE (Health, Safety, Environment, Quality and Product Responsibility);
- ▶ Compliance and Internal Audit (including Risk Management)

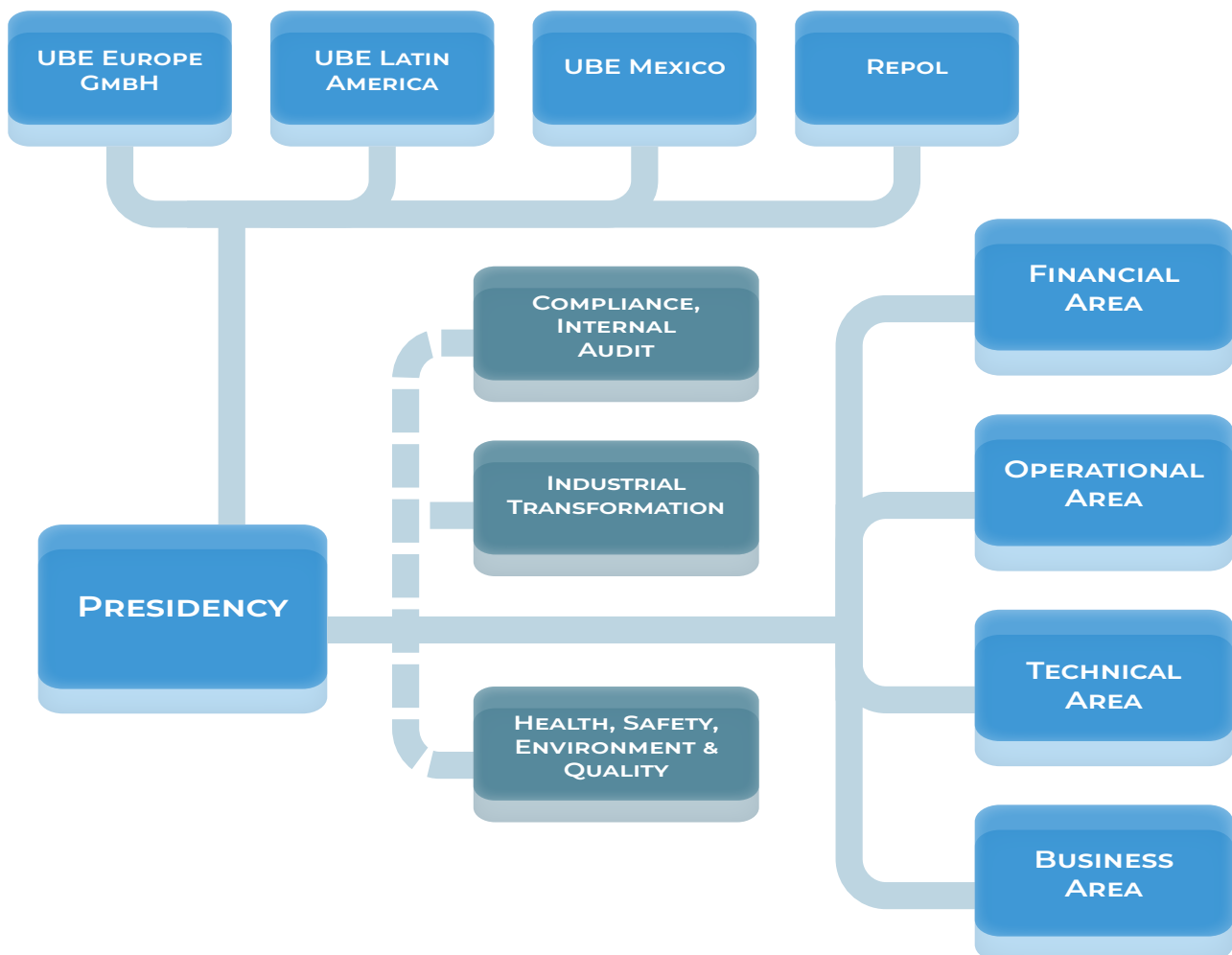
Functional General Sub-Directorates (4):

- ▶ Business Area (CBO) (business units, R&D and Market Intelligence);

- ▶ Financial Area (CFO) (Finance, Controlling, Corporate Planning, Legal, HR, Institutional Relations and IT);
- ▶ Technical Area (CTO) (Project Engineering, Technical Area, Nylon Production Technology, Project Development, Procurement and Contracts)
- ▶ Operations Area (COO) (Production, Maintenance, Reliability and Operations Digitalization)



Figure 1. Organisation of UBE Corporation Europe.



UCE has a number of specialised working committees active in the following areas:

- ▶ Executive Committee (executive representation of the company, strategy and objectives, control of the units and internal co-ordination)
- ▶ Management Committee (monitoring and improvement of the integrated management system)
- ▶ Crisis communication
- ▶ Compliance
- ▶ Ethics and Corporate Responsibility
- ▶ Occupational health and safety
- ▶ Central Safety committee (oversees the strategic security plan)
- ▶ Safe Operations
- ▶ Operational Discipline (recognises good safety practices and detects non-compliance)
- ▶ Asset management
- ▶ Energy management
- ▶ Innovation (prioritisation of developments)
- ▶ Deliberation of inventions (intellectual property policy)
- ▶ Pension Fund (FONDO UBE FP)
- ▶ Treasury and credit risk
- ▶ Sales (production, sales and inventories)
- ▶ Bidding committee
- ▶ Approval of improvements (improvement and change management, resource allocation and prioritisation)
- ▶ Sustainability committee (manages environmental sustainability objectives and plan)

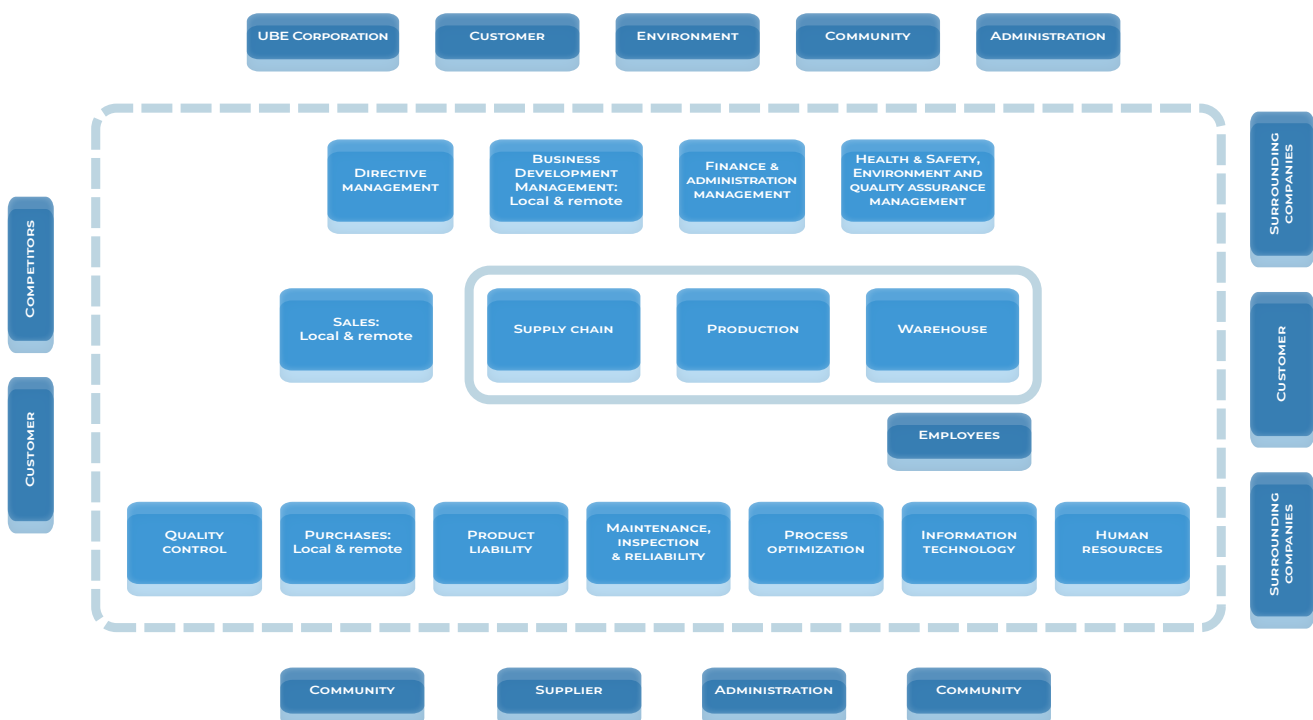
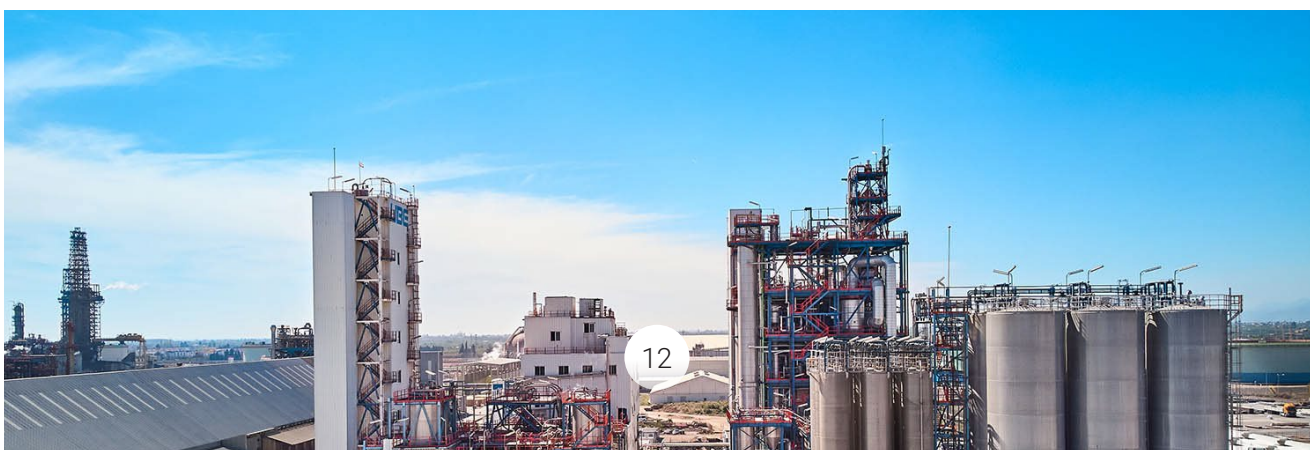


Figura 2. Process map of UBE Corporation Europe.



Role of the governing body

The sole director of the company endorses the group's annual accounts and the management report, which includes the main risks, participating in their analysis and in the preparation of the associated action plans. He is involved in defining the principles and contents of the sustainability report as the person ultimately responsible for the application of UBE Corporation's principles and UCE's Management Policy. Under the supervision of the UCE President, the findings of impact reports, materiality surveys and other sustainability-related information are communicated to the Executive Committee and in application of the Management Policy, the materiality analysis contributes significantly to the risk management procedure, the formulation of the Mid Term Plan and the annual management review of the management system.

The specific objectives established for the UCE Group are defined in the annual budget and other plans, and the results of the activity are monitored on a monthly basis. A quarterly report on the relevant events of the period is drawn up and the economic and financial budget is reviewed every six months. The evaluation of the entire fiscal year is carried out in the first quarter of the following year.

In addition to the formal communication by UCE's chairman of his membership of other organisations and companies, the company has a conflict of interest policy that is applied by the Compliance Body to all staff. UCE's training plan also applies to the top executive and management team of the head office and subsidiaries.

Potential critical concerns regarding negative impacts and other serious contingencies are communicated through the line of supervision up to the management body, or are addressed in specific meetings with various committees, or

with the persons responsible for compliance, ethics, security and legal matters. A number of corporate policies and standards are in place to ensure ethics and compliance within the organisation, along with an Internal Reporting System capable of receiving alerts related to these concerns, which are addressed confidentially.

Both the person representing the sole director and the executive committee have specific training covering different aspects of responsibility and compliance in the exercise of corporate activities. Such training is provided to staff who are promoted or take up management functions for the first time in the UCE Group.

The company has a management by objectives and performance evaluation system, which is described in detail in Chapter 5. The objectives in the UCE Group are set out in the Mid Term Plan, which is in turn aligned with the UBE Corporation's three-year plan. For the three-year period 2022-2024, the UBE Corporation Group has a plan called "UBE Vision 2030 Transformation - 1st Stage", with objectives relating to environmental, social and economic management⁸.

The president's contractual relationship is of an employment nature and he acts as the chief executive and representative of the legal entity, which is the sole director of UCE. He is accountable for his performance to the general management of the Japanese parent company and after evaluation, mid-term targets may be confirmed or revised, in line with the performance of the UBE Corporation group and the surrounding context. Other performance-based adjustment measures may affect the organization of the company or the modification of capital budgets linked to production or R&D projects. There is variable remuneration in the form of a bonus, linked to the achievement of annual targets, and the evolution of the UCE Group's main strategies and their impacts.

⁽⁸⁾ https://ssl4.eir-parts.net/doc/4208/ir_material3/237778/00.pdf

2.3 ACTIVITIES, VALUE CHAIN, BUSINESS MODEL AND PRODUCTS

[2.6 / 301.1]

Activity

According to the Global Industry Classification Standard (GICS), the UBE Corporation Europe Group is classified under the industrial branch, code 15101010 for General Chemical Products, within the Materials sector. **Its main activity is the production of industrial and basic chemical products:**

- ▶ caprolactam (NACE 20.14 - Manufacture of other organic basic chemicals)
- ▶ polyamides, co-polyamides and various engineering plastics and composites (NACE 20.16, manufacture of plastics in primary forms)
- ▶ ammonium sulfate (NACE 20.15, manufacture of fertilisers)
- ▶ fine chemicals (1.6-hexanediol, 1.5-pentanediol, polycarbonatediols) (NACE 20.14)

Other **complementary activities** include research and development, engineering, construction and maintenance services for its own assets, and other proprietary commercial and professional services.

UBE Corporation Europe's central services in Castellon (Spain) direct and coordinate the corporate strategy and operations of the entire group in its various markets, product ranges and activities. It has production lines for caprolactam, fertilisers, fine chemicals (1.6-hexanediol, 1.5-pentanediol, polycarbonatediols), polyamide (or nylon), copolyamides and their compounds. **Repol, S.L.U.** (Almassora, Spain), produces and markets engineering plastics and operates in Spain and several international markets. The other three subsidiaries are responsible for the marketing and promotion of the group's product portfolio in its various geographical areas of influence: the Atlantic area (Europe, Africa, Latin America and

North America) and the Middle East (**UBE Europe GmbH - UEG**); the Latin American market (**UBE Latin America Serviços Ltda. - ULA**); and Central America, North America and the Caribbean (**UBE Mexico S. de R.L. de C.V. - UMEX**).

Value chain

The group has a main production plant in the El Serrallo industrial estate in Castellon, which receives **raw materials** (ammonia, cyclohexane, cyclohexanone, sulphuric acid, sulphur, soda, additives) by road or by sea, via the Port of Castellon, where UBE has an administrative concession for the management of its unloading and temporary storage facilities. Raw materials were purchased on the domestic and international markets from specialised companies of recognised solvency. There were no significant changes in the supply chain in 2024.

2024 PURCHASES OF RAW MATERIALS

KILOTONNES

Organic	102
Inorganic	299

The **production process** is continuous 24 hours a day and is organised into manufacturing units for intermediate materials and final products and auxiliary service units (steam, water, air systems, electrical substations, etc.).

For **environmental management**, it has its own eco-park, which functions as a temporary storage and transfer centre for solid waste, a wastewater treatment plant and various units for the treatment of gaseous emissions.



Finished products in liquid form (caprolactam, liquid fertilisers, fine chemicals) are stored in tanks located in the manufacturing blocks themselves until they are shipped in tankers. The **logistics** areas are complemented by six warehouses where solid products are prepared (caprolactam flakes, ammonium sulfate, fine chemicals in flakes, polyamide pellets) which can be dispatched in bulk, bagged and palletised, in big bags or in octabin. Some fine chemicals are bagged at the end of the production process and stored until shipment. Almost all products are shipped by road, either to the end customer or to the ports of Castellon or Valencia to continue by sea.

Repol, located in Almazora, is dedicated to the formulation, transformation and commercialisation of technical plastics for injection and extrusion and has facilities for the research, production, storage and dispatch of *composites*, which are distributed by road. The main polymers used as raw materials are: polyamide, polypropylene, polycarbonate, POM, ABS, PBT, PET...

The UCE Group's production is sold entirely to companies in the industrial or agricultural sector,

the main customer sectors by type of application being the following:

2024 SALES

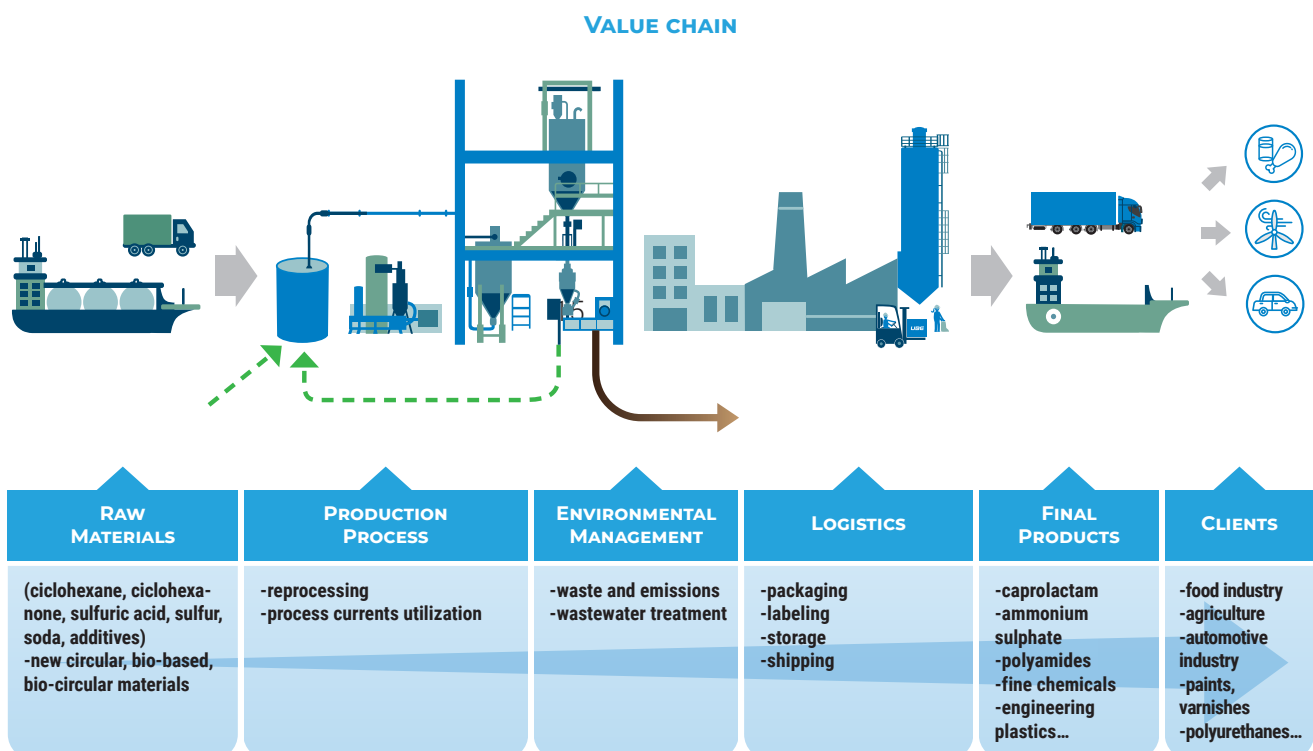
BY APPLICATION SECTOR

%

Agriculture	16
Food industry (packaging)	30
Automotive	24
Paints, varnishes, polyurethane	4
Others	26

Business model

Initially, the business model was based on the sale of caprolactam for transformation into nylon for textile use, and on the commercialisation of ammonium sulfate, a fertiliser widely used for all types of crops and obtained as a co-product of caprolactam. From 1999 onwards, the production of hexanediol, the first fine chemical element resulting from the use of waste process streams, started using UBE Corporation technology. Since 2004, UCE started to manufacture its own nylon for engineering applications, increasing the added



value of the production. In the following years, several capacity expansion, innovation and diversification projects have allowed the development of the product portfolio, offering technological solutions for new applications and uses of polyamides, fine chemicals and their compounds, reaching new customers and markets.

12 RESPONSIBLE CONSUMPTION AND PRODUCTION



Products

► Caprolactam.

It is sold in bulk for use in garments and home textiles, fishing nets and threads, footwear, and other sectors.

► Polyamide.

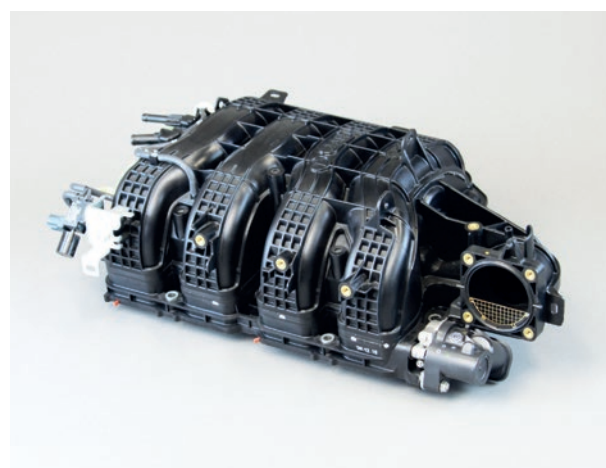
UBE's continuous polymerisation process offers consistently high quality, allowing the widest range of polyamide resins on the market, from homopolymers to copolymers or terpolymers, with multiple applications.

► Polyamide for food protection in the food industry

Many companies strive to design functional and attractive food packaging. UBE Nylon branded polyamide resins help to keep packaged foods fresher for longer and prevent premature spoilage, thanks to packaging that offers mechanical strength, gas barrier and transparency. These high-performance packs, based on multilayer polyamide film, extend the shelf life of perishable products such as meats and cheeses and provide multiple benefits such as ease of storage, safe handling, longer shelf life, aroma and flavour protection, increased export capacity, reduced weight, etc.



► Polyamide for the automotive sector: lighter and high performance solutions.



The range of polyamides, copolyamides and compounds – including UBESTA® branded polyamide-12 – is used in the manufacture of components and lines for fuel, cooling, braking, as well as hydraulic and pneumatic hoses. These



raw materials enable high-performance applications, offering optimal temperature resistance, low permeability, abrasion resistance, flexibility, adhesion, and more. They also contribute to reducing vehicle weight and lowering CO₂ emissions.

► **Engineering plastic compounds.**

Based on various types of polymers (polyamide, polypropylene, polycarbonate, ABS, PBT, PET...), Repol develops and markets materials for technical injection and extrusion applications in industries such as household appliances, automotive, machinery, and electrical and electronic equipment. Its main commercial brands include Dinalon®, Dinablend®, Dinarex®, Dinaplen®, Dinaxan®, Dinatron®, Dinadur® and Dinaform®. For years, the company has carried out post-industrial recovery projects to produce plastics with a renewed useful life based on recycled materials, thereby promoting the circular economy.

► **Fine chemicals: range of high-performance materials applied in the sectors of habitat, mobility, construction and infrastructure, energy, pharmaceutical products, etc.**



Eternacoll® (polycarbonatediol), Eternathane® (urethane prepolymers), Eternalast® (thermoplastic polyurethanes), Eternajet® (aqueous polyurethane dispersions), Ubedisp® (hyperdispersant additives), Heliofresh® (synthetic fragrance), 1,6 hexanediol, 1,5 pentanediol, Daxsol® (glycerol carbonate), dimethylcarbonate, 1,12 dodecanedioic acid, high purity catechol, heliotropin, Methyl 3-Methoxyacrylate (MAME), Methyl ethyl ketoxime (MEKO)... These are value-added products that enhance the durability and technological performance of applications in

the coatings industry, adhesives and sealants, high-performance elastomers, chemical intermediates, ceramic tiles, pharmaceuticals, agrochemicals, solvents, fragrances and flavours, electrical applications, and more.

The polycarbonatediol, hexanediol and pentanediol produced by UBE Corporation Europe are obtained through the use of process streams, avoiding the generation of waste and obtaining added value products for other industries, in a circular economy scheme.

► **Other materials and products of the UBE Corporation group marketed by UCE and its subsidiaries:** polyimides (electronics industry); separators and electrolytes for electric batteries; polybutadiene rubber (vehicle tyres); gas separation membranes (hydrogen recovery, biogas purification...); silicon nitride powder; intermediates and APIs for the pharmaceutical industry; industrial machinery equipment (injection, extrusion, presses, roller mills, dryers etc.)

► **Agricultural fertilisers for all types of crops.** Ammonium sulfate is a fertiliser obtained as a co-product during the caprolactam production process. Through a crystallisation process, UCE produces UBESOL 45®, a fertiliser in granular format that can be applied by precision fertiliser spreaders and centrifuges, with greater precision and economy of resources, allowing a balanced supply of nutrients (sulphur, nitrogen, phosphorus, iron, manganese and other micronutrients) to the crops.



2.4 OBJECTIVES AND STRATEGIES

[2.18 / 2.22 / 2.23 / 2.24 / 2.25 / 3.3 / 413.2]

UCE main principles, philosophy, objectives and strategies are framed and coordinated with those of the parent company UBE Corporation. The medium-term planning unit is called the Mid Term Plan, in periods of three fiscal years. Fiscal year 2024 is the last year of the current plan, called **UBE Vision 2030 Transformation -1st Stage**.

Founding principles of UBE Corporation

Coexistence and mutual prosperity. From finite mining to infinite industry.

Corporate philosophy and vision of UBE Corporation Europe

To focus on technology and embrace innovation to create value for the future and contribute to social progress. Use today's actions to create a better tomorrow, leveraging the Group's strengths in research, development, manufacturing and marketing of environmentally friendly chemicals, polymers and speciality products.

UBE Corporation Europe's **Management Policy**⁹ expresses its commitment to the values of responsibility, integrity, sustainability, equality and diversity. The company is committed to anticipate and meet the requirements of internal and external customers, to comply with legal, ethical, UBE Group requirements and other programmes subscribed to by the company, as well as to preserve health and safety, protect the environment, prevent environmental pollution and other

impacts arising from activities, assessing and mitigating all types of risks and enhancing mutually beneficial relationships with stakeholders.

In 2024, the **Environmental Sustainability Policy** has been reformulated, in line with the spirit of "coexistence and mutual prosperity", expressing its commitment to the creation of value through its products, services and technologies, as well as throughout its entire value chain, promoting the preservation of natural resources, ecosystems and their biodiversity, actively contributing to the fight against climate change and the prevention of pollution, and fostering a healthy environment without compromising the needs of future generations.

The company aims to promote the circular economy by encouraging the use of raw materials of circular origin, seeking the recyclability of the products marketed by the Group, minimising the generation of waste and seeking the recovery of the waste produced.

The **Environmental Sustainability Master Plan** drafted this year acts on four strategic axes that take into account UCE's long-term commitments, the strategic focus of the parent company and the gaps identified in the initial positioning, with an initial horizon until 2030.



⁽⁹⁾ Access to public information on sustainability and human rights objectives, commitments and policies on the company's website. <https://ube.es/es/sostenibilidad/nuestros-objetivos/>

STRATEGIC AXIS	GOAL	STRATEGIC LINE
Climate change	Achieve a low-carbon production model, minimising the environmental impacts of our activity and our vulnerability to the environment.	Climate change mitigation and adaptation
		Energy management
Circular economy	Implement a circular economy model that optimises the use of resources, reduces waste generation and promotes the reuse and recycling of materials, contributing to UCE's environmental and economic sustainability.	Circularity management
		Waste management
Positive nature	To halt the loss of biodiversity and the degradation of ecosystems by minimising pollution and the responsible management of water resources.	Transversal nature line
		Water resources
		Biodiversity and ecosystems
		Pollution
Transversal	Integrate sustainability aspects into UCE's governance and strengthen ESG reputation, establish a sustainable product portfolio and integrate sustainability into the supply chain.	Sustainable products
		Supply chain
		Reporting and communication
		Environmental governance

The UCE Group's strategic management approach also responds to health and safety risks, two aspects that are particularly relevant in its sector.

For its part, UBE Group articulates its global strategy for 2030 around the vision "**A business group focused on speciality chemicals contributing to the global environment, human health and an enriched future society**" and the *Mid Term Plan*, which concluded this year, aimed to leverage manufacturing technologies to create the value required by society, in a safe and environmentally friendly way, and make it available to people, thereby helping to solve global environmental problems. The following key **management strategies** have been applied¹⁰:

- ▶ Overall profit growth, driven by speciality chemicals
- ▶ Structural changes in response to global environmental problems
- ▶ Enhancing human capital through diversity and inclusion
- ▶ Increasing business value and creating customer value by driving digital transformation
- ▶ Improving governance (strengthening decision-making and accountability; promoting the Integrated Management System as a tool to streamline governance and compliance; developing risk management culture and contingency planning; monitoring new regulations and compliance training).

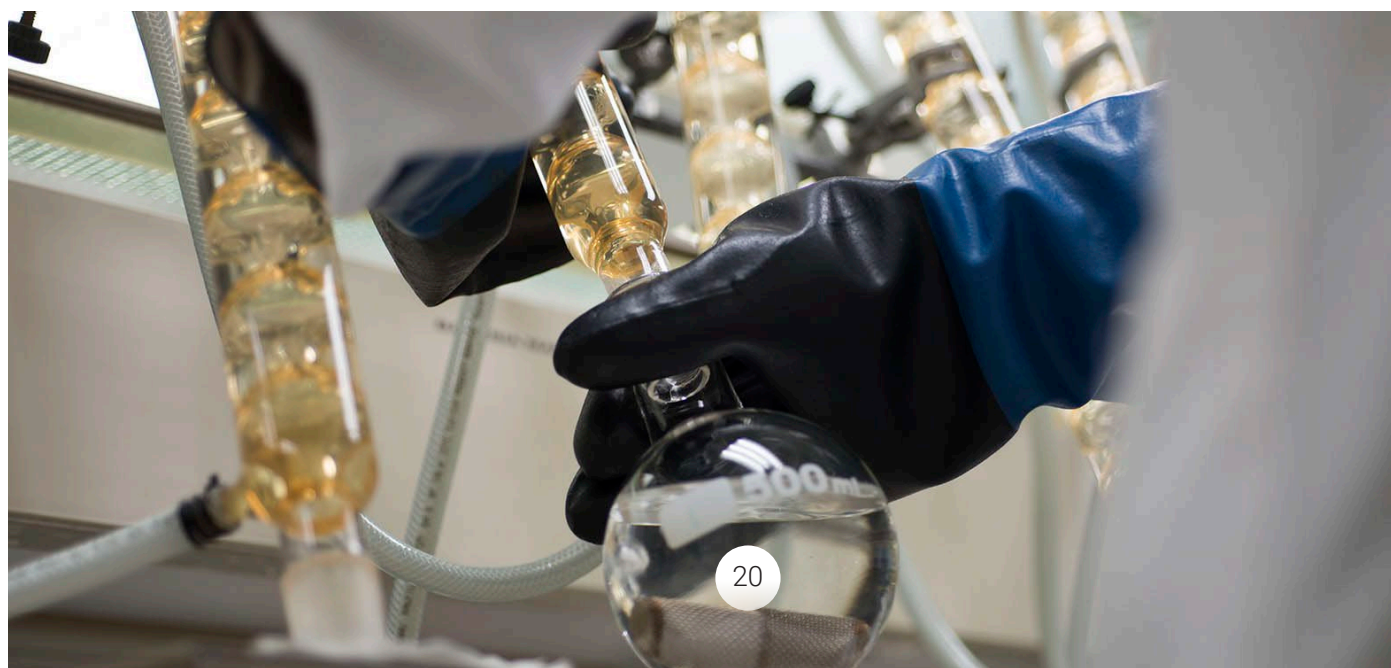
⁽¹⁰⁾ https://ssl4.eir-parts.net/doc/4208/ir_material3/237778/00.pdf

UBE Corporation's main strategies for the chemical business are:

- ▶ Promote structural changes by investing in speciality chemicals (polyimides, gas separation membranes, separators, composites, fine chemicals, high performance coatings, pharmaceuticals etc.) and expand environmentally friendly products.
- ▶ Move towards decarbonisation by increasing energy efficiency and savings, the use of renewable energies, reducing GHG emissions, developing new technologies for the use and utilization of CO₂ etc.
- ▶ Strengthen the growth base of the pharmaceutical sub-sector through new product development bases and production technologies.
- ▶ Strengthen UBE's position in extrusion polyamides by developing environmentally beneficial products and solutions for plastic waste.
- ▶ Expanding global production of fine chemicals, including the use of sustainable raw materials.
- ▶ Diversifying work styles to develop human resources and competitiveness.
- ▶ Incorporating information and communication technologies to create value and efficiency.
- ▶ Strengthen quality management systems in the group, develop compliance and business ethics.

At UBE Corporation Europe and its group, this strategy is implemented through the following activities:

- ▶ Development of nylon production and innovation in new nylon applications and thinner plastic films to reduce waste, reuse and recycle products.
- ▶ Research and development of *know-how* in new grades and applications in fine chemicals.
- ▶ Development of bio-based and recyclable products (caprolactam, polyamides, PCD).
- ▶ Energy integration and efficiency projects to reduce energy consumption and CO₂ or other greenhouse gas emissions.
- ▶ Implementation of the 2030 Environmental Sustainability Master Plan in several strategic sustainability axes: climate change, circular economy, positive nature and sustainable product and value chain.
- ▶ Establishment of Scope 1 and 2 carbon footprint reduction targets according to the Science Based Targets initiative.
- ▶ Development and promotion of high value-added ammonium sulfate.
- ▶ Coordination of sales in the Atlantic area through its subsidiaries.
- ▶ Improving the quality assurance of technology products and services, strengthening the management system and the compliance structure of the UCE Group.
- ▶ Efficient and effective management system for the entire life cycle of assets in order to maximise their value and performance



2.5 MAIN FACTORS AND TRENDS LIKELY TO AFFECT FUTURE DEVELOPMENTS

[2.23 / 2.24 / 2.25 / 2.27 / 2.28 / 3.1 / 3.2]

Integrated management system, precautionary approach and risk analysis

The **Integrated Management System**¹¹ enables the monitoring of compliance with the company's objectives and strategies, as well as the control of risks and impacts associated with the Group's activities. It encompasses the requirements of certified standards and regulations such as ISO 9001, ISO 14001, ISO 45001, IATF 16949 (limited to nylon compound production), ISO 50001, and ISO 55001. It also includes food safety management tools (limited to nylon production at the polymerisation plants) and initiatives such as Responsible Care, Ecovadis, OCS (Operation Clean Sweep), and ISCC PLUS, which cover and assess areas including quality, environment, and occupational health and safety¹². A new Ecovadis assessment is scheduled for 2025¹³.

In application of the precautionary approach, the system includes a change management procedure for the systematic evaluation of any type of change, permanent or temporary, ensuring the communication, control and reduction to an acceptable level, of potential risks to people, facilities, products or the environment. This procedure applies in particular to design changes in the production plant, deviations from limit values or documented safe procedures, changes outside design specification or that may affect

safety, environment, quality or product-specific legislation, and even significant changes in the organisation or personnel.

The UCE Group carries out an **annual risk assessment** in accordance with a corporate standard, with the aim of establishing a harmonised level of protection against those risks that may impact the different stakeholders and the organisation itself, in environmental, social and governance matters, as well as in aspects of growth and development, taking into account its value chain.

This risk analysis is applied systematically to all areas and operations of the group, including finance, health and safety, information systems, compliance, facilities, process design, project execution, sales, among others. In particular, with regard to the safety of production processes, specific studies are carried out to identify hazards, assess risks and implement mitigation measures, using different techniques known as Process Hazard Analysis (PHA).

For each identified risk, a designated area or responsible official is assigned. Depending on the severity of the risk, appropriate contingency or mitigation plans are developed. These may include investment projects, strategic initiatives, the formation of ad-hoc working groups focused on improvement objectives, among other measures. The plans are evaluated annually and reported to senior management in order to ensure adequate risk management. The Risk Matrix resulting from this process allows the risks to be classified into three levels (high, medium or low) and facilitates the adoption of countermeasures, the analysis of their evolution and the identification of **opportunities for improvement in management**.

(¹¹) [Integrated Management System - UBE Corporation Europe](#)

(¹²) [Management - UBE Corporation Europe](#)

(¹³) <https://ecovadis.com/> The Ecovadis assessment is based on international CSR standards such as the UN Global Compact, GRI (Global Reporting Initiative) and ISO 26000.

MAIN CORPORATE RISKS

ENVIRONMENT	GOVERNANCE	GROWTH	SOCIETY
Major accident	Product quality & liability	R&D	Human capital & rights
Natural disaster	Information security	Strategy & operational	
Environmental issues	Regulatory & compliance		

Through the Quality Assurance group and the Business Units, customer requests and concerns regarding environmental, social and governance aspects are channelled and addressed. These inputs play a key role in reviewing and improving the company's commitments and strategies. Likewise, the company continuously monitors **regulations and potential changes** that may affect the marketing of its products, with the aim of integrating legislative updates, improving the process of record maintenance, and identifying risks associated with chemical products. These efforts contribute to protecting the environment, as well as the health of workers and customers. UCE participates in various working groups to update its procedures, analyses, and technical documentation, with the following objectives:

- ▶ REACH compliance and monitoring of latest developments: registration of polymers; nano-materials; mixture assessment factor; concept of "essential use"; restrictions on the use of isocyanates, PFAS - perfluoroalkyl and polyfluoroalkyl substances, restriction of microplastics etc.; awareness of the use of substances of very high concern...

- ▶ Compliance with the CLP Regulation and its latest developments: digitalisation of hazard label information, introduction of new hazard classes in studies (endocrine disruptors; persistent, bioaccumulative and toxic substances...).
- ▶ Compliance with the requirements set out in the drug precursors, explosives and chemical weapons regulations.
- ▶ Awareness of the risks associated with chemicals and the search for alternative sustainable products.
- ▶ Monitoring of possible amendments to the European Fertiliser Regulation.
- ▶ Monitoring and implementation of the necessary actions to ensure the appropriate use of recycled material and its use in food contact application.
- ▶ Monitoring of the necessary actions of the possible new Ecodesign Regulation for sustainable products with its respective digital passport.
- ▶ Positive list of materials authorised to be in contact with drinking water.
- ▶ Monitoring of legislative changes in the United Kingdom (UK- REACH), Turkey (UK-

KKDIK), United States (TSCA), China, Latin America, Mexico...

All these changes and improvements reinforce UCE Group's compliance with the European *REACH* (Registration, Evaluation and Authorization of Chemicals) and *CLP* (Classification, Labeling and Packaging of Substances and Mixtures) regulations as well as any related legislation by application and geographical area.

External initiatives

1. In March 2025, the Spanish Chemical Industry Business Federation (FEIQUE) renewed the **Responsible Care**¹⁴, certification - a voluntary Corporate Social Responsibility (CSR) programme focused on sustainability- to which UCE is affiliated. The companies in the sector represent a production volume of 60% of the sector. It is a global initiative of the chemical industry whose aim is to promote continuous improvements in safety, health and environmental protection and other parameters of social responsibility among companies, implemented and measured against improvement targets, in accordance with the principles of Sustainable Development. It comprehensively covers aspects of CSR through six management codes and their respective progress indicators.

2. In December 2023 **Science Based Targets initiative (SBTi)**¹⁵ validated the near-term GHG emission reduction targets submitted by **UBE Corporation**, (including those of the UCE Group). UBE Group commits to reduce absolute Scope 1 and 2 GHG emissions by 45% by fiscal year 2030 compared to the base year 2021. SBTi confirmed that these targets are in line with its scientific criteria and recommendations, being in line with a 1.5°C trajectory. SBTi is an independent global organisation that emerged from a collaboration between the Carbon Disclosure Project (CDP),



the United Nations Global Compact, the World Resources Institute (WRI) and the World Wildlife Fund (WWF). Its purpose is to guide companies to set and achieve ambitious emissions reduction targets in line with the latest climate science.

3. In 2021 UBE Corporation, parent company of UBE Corporation Europe joined the **United Nations Global Compact**, a corporate sustainability initiative mandated by the United Nations to encourage companies to achieve the Sustainable Development Goals (SDGs). The *Communication on Progress report*¹⁶ consolidates information from all subsidiaries, including UBE Corporation Europe.

⁽¹⁴⁾ <https://www.feique.org/programa-responsible-care/>

⁽¹⁵⁾ <https://sciencebasedtargets.org/>

⁽¹⁶⁾ [UNGC COP Viewer \(unglobalcompact.org\)](https://www.unglobalcompact.org/)

Membership of associations

[2.28]

1. Castellon Chamber of Commerce

2. **Feique** (Spanish Chemical Industry Business Federation)

3. **Quimacova** (Chemical and Environmental Association of the Chemical Sector of the Valencian Community)

4. **Indes** (Association of Industries of El Serrallo de Castellon)

5. **CEV** (Business Confederation of the Valencian Community)

6. **CEJE** (Japan-Spain Business Circle)

7. **Suiyokai** (Japanese Business Association)

8. **Jaume I University-Business Foundation of the Valencian Community**

9. **Castellon CSR Committee**

10. **APD** (Association for the Advancement of Management)

11. **Energy Cluster of the Valencian Community**

12. **Port Castello Foundation**

13. **Plastics Europe Spain**

14. **Anaip** (Spanish Association of the Plastic Industry)

15. **AVEP** (Valencia Plastic Industry Association)

16. **APA** (Advanced Packaging Association)

17. **CEP** (Spanish Plastics and Composites Centre)

18. **RecyClass** (Plastics Recyclers Europe)

19. **Ceflex** (Circular Economy for Flexible Packaging)

20. **Acogen** (Spanish Association of Cogeneration)

21. **Bequinqor** (National Association for the Standardisation of Capital Goods and Industrial Safety)

22. **AEM** (Spanish Maintenance Association)

23. **AeH2** (Spanish Hydrogen Association)

24. **Aimplas** (Technological Institute of Plastics)

25. **Ainia** (Technological Institute of the Agrofood Sector)

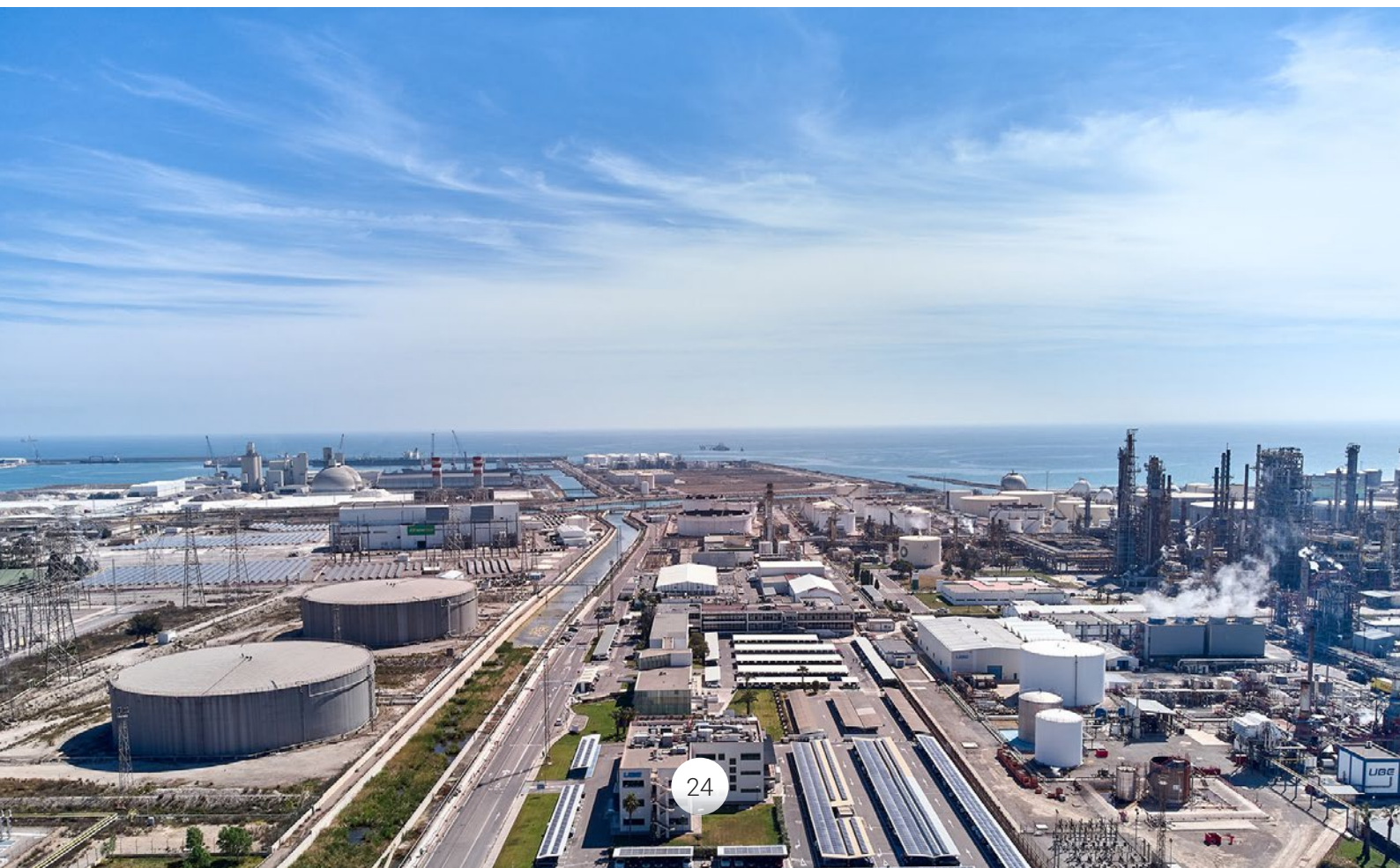
26. **Anffe** (National Association of Fertiliser Manufacturers)

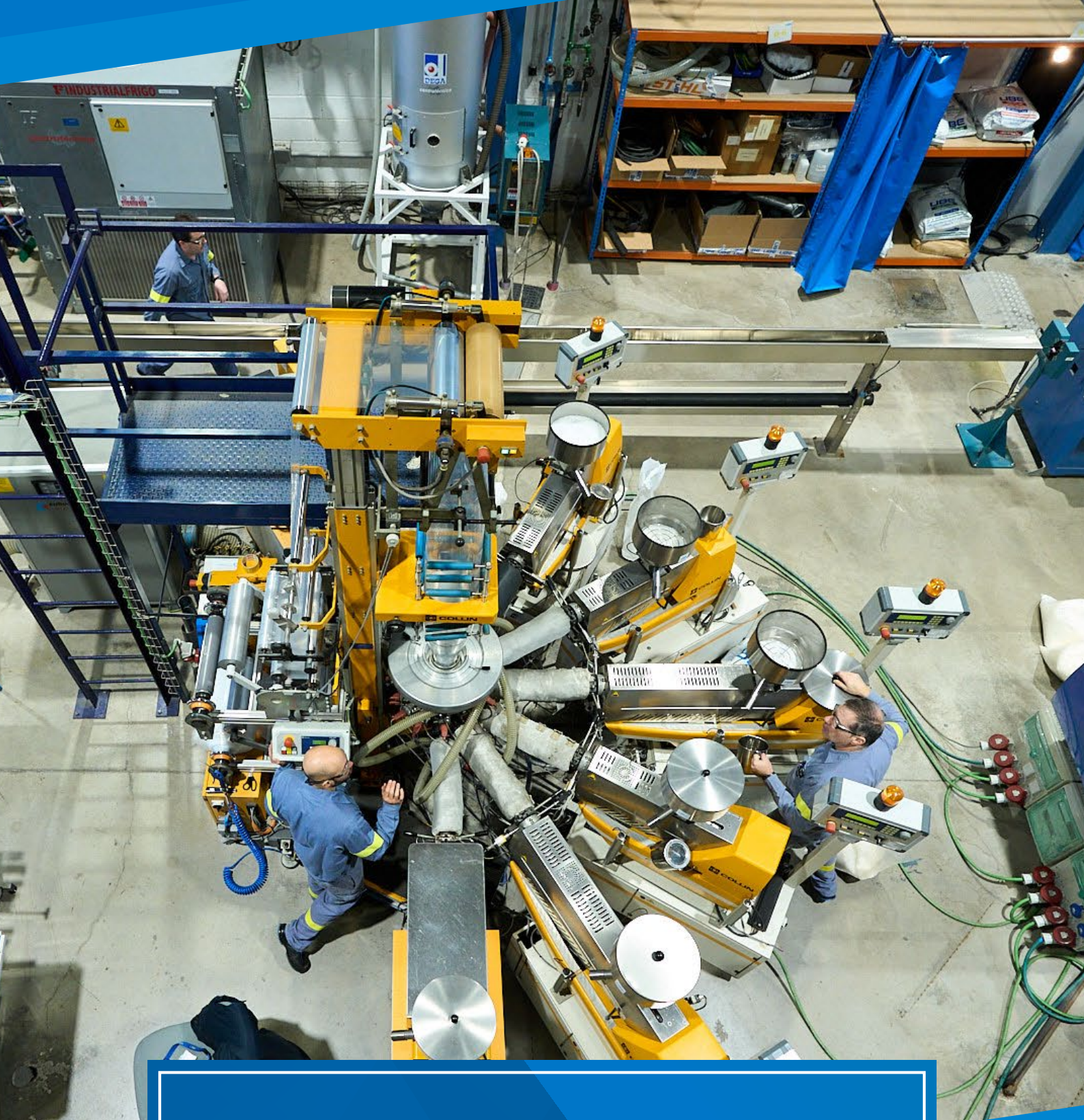
27. **Ifa** (International Fertilizers Association)

28. **EPCA** (European Petrochemical Association)

29. **IPSG** (The International Process Safety Group), IChemE

30. **Joiff** (International Organisation for Industrial Emergency Services Management)





3. MATERIALITY MATRIX

[2.29 / 3.1 / 3.2 / 3.3 / 413.2]

Approach to the determination of material issues

To identify and assess relevant impacts, UCE has followed a comprehensive approach based on the analysis of the following elements:

1. Organisational context: As described in the Integrated Management Manual, the internal and external environment that influences the company's ability to achieve its strategic objectives has been considered.

2. SWOT analysis: An analysis of weaknesses, threats, strengths and opportunities has been carried out, which includes aspects of the business itself as well as those related to quality, safety and the environment.

3. Stakeholder requirements, needs and expectations: these have been identified and linked to the main policies, plans, actions and measures contained in the integrated management system.

4. Identification and assessment of actual and potential impacts: These are set out in the Corporate Risk Matrix. Effective risk management is fundamental to achieving the company's objectives. The sole director, together with the deputy general managers, is responsible for integrating this management in each area in accordance with established corporate policies and standards.

5. Study of material impacts: The list of 27 economic, social and environmental impacts identified and classified according to their relevance for stakeholders was considered in the study carried out in 2019 and updated in 2023 by researchers from the Practical Ethics and Democracy group of the Universitat Jaume I of Castellon. These impacts scored over 3 on a scale of 1 to 5, with no major discrepancies between UBE and its stakeholders (Annex I).

6. Results of audits, evaluations and management indicators: Findings from self-assessments, internal audits, third party reviews,

management indicators, analysis of possible incidents and the Management Review of the Management System have been incorporated, all in accordance with the requirements of ISO 9001, ISO 14001, ISO 50001, ISO 45001, ISO 55001, IATF 16949, ISCC+, OCS (Operation Clean Sweep) and current legislation.

7. Various consensuses and global private initiatives:

- ▶ Operation Clean Sweep (OCS)
- ▶ Science Based Target initiative
- ▶ Responsible Care
- ▶ Sustainable Development Goals
- ▶ Universal Declaration of Human Rights
- ▶ International Sustainability & Carbon Certification ISCC+

The analysis of stakeholder requirements, needs and expectations - aligned with the impacts identified through stakeholder surveys - together with the categorisation of the most relevant corporate risks, allows for the identification of the material issues included in this Non-Financial Information Report.

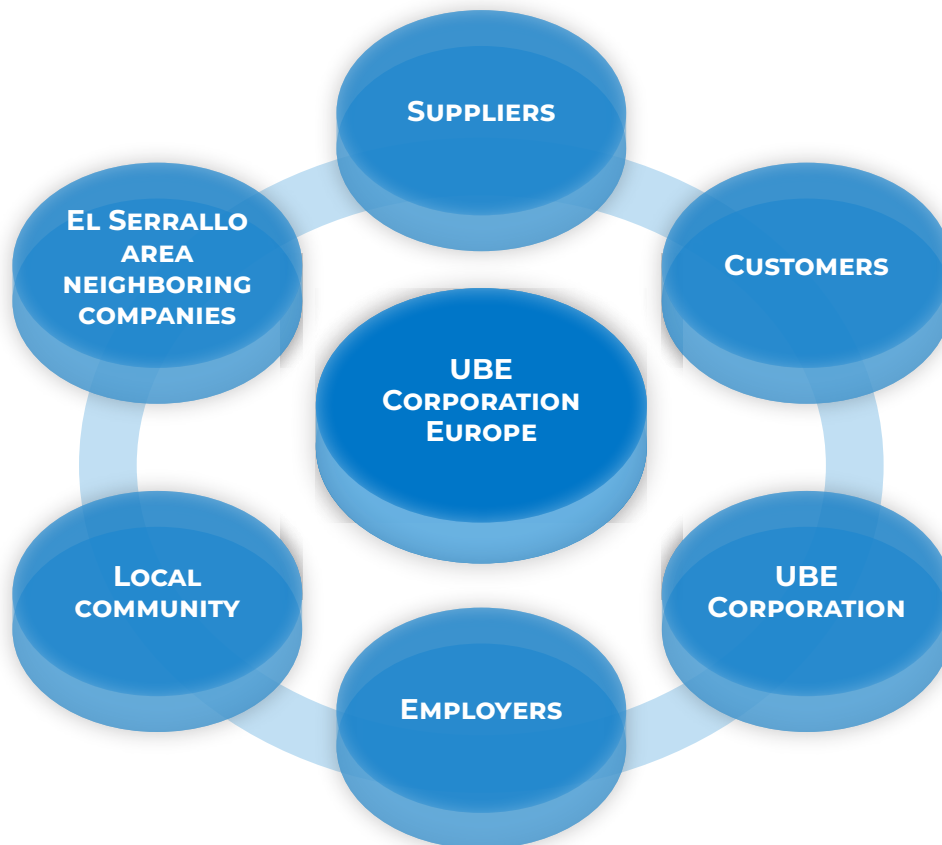
The resulting **Materiality Table** presents these issues grouped in five blocks, together with the main risks, impacts and opportunities related to the company's activities and business exchanges, in the economic, environmental and social spheres, including human rights.

With respect to the table prepared the previous year, three topics corresponding to noise, light and visual pollution have been unified into a single topic called "Continuous minimisation of environmental impact: noise, visual and light pollution in line with SDGs" and the topic "Productive investment in innovation" has been excluded, as it is considered an internal management tool. Furthermore, following the analysis of the requirements, needs and expectations of stakeholders and the management review of the management system, five new material issues have been included, considered relevant and not previously included, but which complement the impacts identified in point 5:

- ▶ Digitalisation as a tool for continuous improvement
- ▶ Ethics and *compliance*
- ▶ Energy efficiency
- ▶ Prevention of pellet contamination
- ▶ Responsible and efficient use of assets

The UCE Group maintains a constant dialogue with its stakeholders through the different areas of the organisation, being receptive to their expectations, legitimate interests, requirements and needs. In addition, regular meetings, consultations and complementary surveys are conducted with stakeholders.

The resulting Materiality Table contains 29 material topics.



Stakeholder map



TABLE OF MATERIALITY

Categories	Risks, impacts, opportunities	Material issues	Objectives and measures
<p>GOVERNANCE</p> <p>Chapters related:</p> <p>2.4 Objectives and strategies</p> <p>6.1 Evaluation of Human rights</p> <p>7. Ethics and compliance</p> <p>7.1 Corruption and bribery</p> <p>8.2 Subcontracting and suppliers</p>	<p>► Non-compliance with laws and regulations (composition, product safety and operations) could lead to sanctions, restriction of activities and reputational erosion.</p> <p>► Quality problems could lead to lower sales or compensation payments.</p> <p>► Supply chain problems, natural disasters or socio-economic and political crises could impact on the prices of raw materials, energy and logistics, affecting the value chain or own operations.</p> <p>► Conditions caused by reputational erosion</p> <p>Opportunity:</p> <p>► Completion of the new unloading terminal at Port Castellon.</p>	<ol style="list-style-type: none"> 1. Good corporate governance and regulatory compliance 2. Continuous improvement and management system (quality consciousness) 3. Digitisation as a tool for continuous improvement 4. Transparent information and accountability 5. Fostering local socio-economic development 6. Community relations (civic and solidarity organisations) 7. Partnerships with society and public administrations 8. Corporate alignment with SDGs 9. Human Rights impact assessment 10. Supplier policy. Responsible management of the supply chain (integration of governance, sustainability and environmental values). 11. Ethics and Compliance 	<p>The company's organisational structure and the delegation of functions allow careful decision-making, governed by internal policies and integrated management system certifications, updated to respond to the various impacts (Management Policies, Promotion of Health at Work, Environmental Sustainability; Prevention of Serious Accidents, Internal Information System, UBE Action Guidelines...).</p> <p>The objective is to take advantage of the accumulated technological potential and know-how to promote stable growth in the field of value-added materials in line with the SDGs.</p> <p>UBE aspires to be a good neighbour that progresses together with its surrounding community and maintains open lines of communication with institutions and organisations.</p> <p>The aim is to boost responsible supply chain management, mitigate risks associated with single suppliers, ensure that they meet quality and safety requirements, and improve the assessment of human rights and sustainability aspects, currently based on monitoring through assessments, audits and contractual measures.</p> <p>2024 Highlights</p> <ul style="list-style-type: none"> ► Update of the Environmental Sustainability Policy. ► Compliance and Ethics Training. New corporate standard for <i>Security Trade Control</i> ► Coordination between Purchasing and Quality Assurance in relation to REACH and CPL compliance of suppliers (UCE and Repol) Improved traceability between orders and production (Repol).



Categories	Risks, impacts, opportunities	Material issues	Objectives and measures
<p>HEALTH AND SAFETY</p> <p>Chapters related: 5.2 Health and safety</p>	<ul style="list-style-type: none"> ▶ Loss of information or a cyber-attack could cause a system crash or other unforeseen event, causing damage or shutting down production. ▶ Lack of security could lead to accidents ▶ Conditions caused by natural disasters <p>Opportunities:</p> <ul style="list-style-type: none"> ▶ Information on incidents and technical maintenance issues shared within the UBE Group ▶ Three-year investment plan including replacement of equipment 	<p>12. Commitment to occupational health and safety.</p> <p>13. Risk and accident management, emergency preparedness (general security, war in the European arena, or cyber-attacks).</p> <p>14. Cybersecurity and data protection</p>	<p>The annual corporate risk review identifies possible scenarios and implements measures, procedures and policies to minimise them.</p> <p>Emergency prevention and response plans have been developed. Staff training in health and safety, including cybersecurity, and investments in industrial and digital security projects complement the management of these material aspects.</p> <p>2024 Highlights</p> <ul style="list-style-type: none"> ▶ Repol has completed the update of the Self-Protection Plan and the risk assessments in the workplaces. ▶ Development of a contingency plan in the event of a cyber-attack. ▶ Within the Cybersecurity Plan, the Data Loss Prevention System has been strengthened, as well as security in the Distributed Control System.
<p>HUMAN RESOURCES DEVELOPMENT</p> <p>Chapters related: 5.3 Social relations</p>	<ul style="list-style-type: none"> ▶ Loss of expertise or difficulty in recruiting experienced relief staff could affect operations and compliance. ▶ Inadequate human capital management could affect performance. 	<p>15. Talent management and retention</p> <p>16. Working conditions and social benefits</p> <p>17. Professional development and specialised training</p> <p>18. Equality and diversity management. Work-life balance.</p>	<p>People are the brains and the engine of sustainable growth in the medium and long term. Through the organisation of functions, training, internal communication and the analysis and improvement of productivity, the company accompanies the process of transformation and continuous improvement.</p> <p>The Global Human Resources Policy guarantees dignity and personal development, through management by objectives, equality plans, Work-life conciliation measures, teleworking, flexibility and other aspects of labour relations.</p> <p>2024 Highlights</p> <ul style="list-style-type: none"> ▶ Development and implementation of a Succession Plan for top management ▶ Integration of UCE and Repol teams in the areas of R&D, safety, quality and product responsibility.



Categories	Risks, impacts, opportunities	Material issues	Objectives and measures
<p>SUSTAINABLE GROWTH</p> <p>Chapters related:</p> <p>1. Letter from the president</p> <p>2.4 Objectives and strategies</p> <p>8.1 Commitments to sustainable development and society</p>	<ul style="list-style-type: none"> ▶ Conditions caused by delays or failures in R&D projects, leaks of technical information or intellectual property disputes ▶ Sales decline due to inability to meet customer demand on time or at competitive cost. ▶ Impact of limited availability or rising costs of raw materials and energy ▶ Variable factors affecting business performance <p>Opportunities:</p> <ul style="list-style-type: none"> ▶ Development of recyclable or biobased materials ▶ UBE INFINITY Global Mark for products assessed according to ISO 14001:2015 criteria. 	<p>19. Growth and economic performance</p> <p>20. Growth in markets and customers (alignment with UBE's global strategy; business continuity plans)</p> <p>21. Responsible and efficient use of assets</p>	<p>In line with UBE Corporation, the focus is on stable growth, building an organisation capable of generating positive results regardless of the economic climate.</p> <p>The disparate evolution of markets in recent years has led to improved flexibility in production plants. The Mid-Term Plan aims to direct innovation resources toward developing a portfolio of high value-added, lower-carbon specialty products and materials, and fostering planning and collaboration across business areas and partners.</p> <p>Measures have been taken to ensure business continuity, including monitoring the financial health of critical suppliers, identification and/or approval of alternative raw material suppliers and maintenance contractors available on demand, stock control of critical components and equipment etc. Other elements are the protection of intellectual property, the optimisation of margins, prices and inventories or the legal formulation of our commitments and contracts.</p> <p>2024 Highlights</p> <ul style="list-style-type: none"> ▶ Action plan of the new Market Intelligence unit to identify new materials, applications and market niches. ▶ Plant integrity based on a medium and long-term equipment renewal plan, in line with UBE's global strategy.





Categories	Risks, impacts, opportunities	Material issues	Objectives and measures
<p>CLIMATE CHANGE AND CIRCULARITY</p> <p>Chapters related:</p> <p>2.4 Objectives and strategies</p> <p>4. Environment</p> <p>4.1 Climate Change</p> <p>4.2 Circular economy</p>	<p>► Adapting the production plant to new emission, discharge and waste requirements or the correction of inadequate waste management practices could result in high costs or impacts on third parties.</p> <p>► Delay in responding to EU strategies on circular economy, positive nature etc. could negatively affect sales or public confidence.</p> <p>Opportunity:</p> <p>► Acquisition of Manufaturas Paulowsky, a producer of post-consumer recycled plastics.</p>	<p>22. Atmospheric pollution (emissions management)</p> <p>23. Waste management</p> <p>24. Life cycle management / circular economy (bio-based products, recyclable products, products with recycled content...)</p> <p>25. Responsible and efficient use of water</p> <p>26. Biodiversity management</p> <p>27. Pellet pollution prevention</p> <p>28. Continuous minimisation of environmental impact: noise, visual and light pollution in line with the SDGs.</p> <p>29. Energy efficiency</p>	<p>To respond to the challenge of Climate Change, the Environmental Sustainability Master Plan and the associated Risk and Opportunity Analysis have been completed. The objective of the Decarbonisation Policy is to achieve carbon neutrality by 2050.</p> <p>To enhance the contribution of our materials and technologies to reducing end-user GHG emissions and waste, we plan to develop circular and bio-based products, while minimizing process energy intensity and the use of non-renewable, exhaustible, and natural resources such as water. We have a solid, certified environmental management system and we study ways of collaboration or new technologies to reduce waste generation and optimise waste management.</p> <p>2024 Highlights</p> <p>► Collaborations: RecyClass (evaluation of the recyclability of nylon contained in flexible polyethylene packaging systems); APA (technical testing of biodegradability and recyclability of nylon on an industrial scale); D4R (design for recycling), through CENELEC (European Committee for Electrotechnical Standardisation).</p> <p>► OCS AENOR certification of the <i>Operation Clean Sweep</i> scheme to reduce potential releases of microplastics into the environment.</p>



4. ENVIRONMENT

[2.22 / 2.23 / 2.24 / 2.25 / 2.27 / 3.3 / 201.2]

Among the **material issues** to which the company pays special attention are those related to climate change and circularity. These two issues include atmospheric pollution, waste management and the responsible and efficient use of water.



The main negative impacts are related to limitations in the management of emissions, noise and waste, as well as possible operational problems caused by extreme natural phenomena or climatic variations. These factors can interfere with the operation of the plant and lead to undesirable consequences for both the environment and people.

During 2024, the company conducted a **climate risk and opportunity analysis** following the recommendations of the Task Force on Climate-Related Financial Disclosure (TCFD), now integrated into the CSRD¹⁷. The potential risks associated with a higher impact in the short term for the company are:

- ▶ Drought: An action plan is in place to reduce water consumption, including reprocessing of waste water, reduction of water consumption in plant and other future projects. An analysis of the risk associated with the fertiliser business has been carried out and a mitigation action plan has been prepared.
- ▶ The most important transition risk identified is that of carbon taxation (CBAM and ETS). A decarbonisation plan is available and is discussed in more detail elsewhere in this report.

In addition, an analysis of impacts, risks and opportunities has been initiated, with the approach indicated in the CSRD regulations, on the remaining environmental aspects such as Water and water resources, Biodiversity and Circular Economy, including those that may arise within the value chain, which is expected to be

completed by the end of 2025.

At UCE, the balance needed to achieve sustainable viability both as a company and as a society, for the benefit of future generations, is based on several strategic axes: Climate Change, Circular Economy, Positive Nature, Sustainable Product and Value Chain.

UCE has updated its **Environmental Sustainability Policy**, in line with that of its parent company, committing itself to the urgent adaptation to climate change, the promotion of the transition to a circular economy, the protection of water resources, the conservation of biodiversity, and



the promotion of sustainability in the value chain. In accordance with this **Policy**, UCE envisages various measures to minimise the energy intensity of products, maximise the purchase of CO₂-free energy, restructure production processes and supply an increasing amount of materials and products that contribute to reducing GHG emissions.

(17) <https://www.boe.es/buscar/doc.php?id=DOUE-L-2022-81871> Directive of the European Parliament and of the Council on sustainability reporting by companies.

Furthermore, the **Code of Ethics and Conduct** and the **Management Policy** include commitments to care for the environment and the fight against climate change by reducing GHG emissions and promoting the sustainable use of resources.



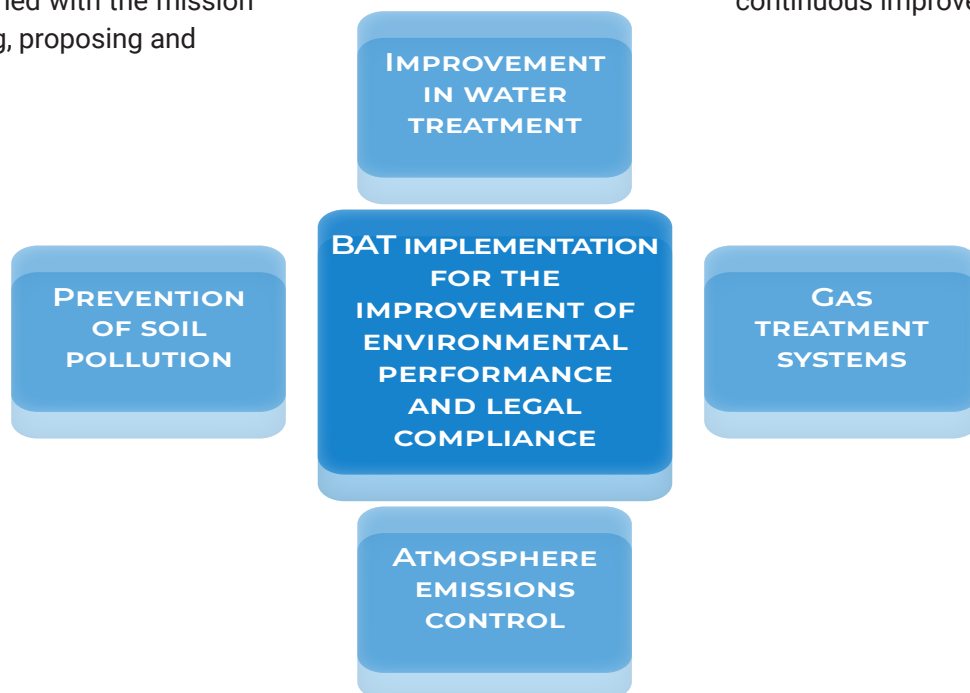
UCE and Repol have environmental management systems certified according to **ISO 14001**, and UCE also has the **ISO 50001** energy certification and the **ISO 55001** asset management certification.

Since 1999, UCE has adhered to the **Responsible Care** Programme, which aims to continuously improve safety, health and environmental protection in all its operations and is carried out in accordance with the principles of Sustainable Development.

Compliance with all these policies and principles is applied by each person in the organisation within their area of action and in the 2023 financial year a department called **Industrial Transformation Unit** was established with the mission of developing, proposing and

implementing the industrial transformation strategy, including the definition and execution of the path towards decarbonisation and circularity, aligning the renewal strategy of existing industrial assets to the new environmental and market demands. The unit works transversally with the rest of the organisation. This department coordinates the implementation of the Environmental Sustainability Master Plan. In addition, other areas of the company are in active contact with administrations and sectoral associations in relation to environmental management.

The main objective of the company's environmental management is to promote sustainability, establishing goals aimed at preventing, reducing or mitigating environmental impacts. To this end, it focuses on the continuous improvement of its processes, the systematic monitoring of key indicators and the application of Best Available Techniques (BAT). Through the **Executive Committee**, the **Management Committee** and the **Sustainability Committee**, management monitors environmental performance, evaluates compliance with established objectives and defines action plans for continuous improvement¹⁸.



⁽¹⁸⁾ The data shown in the different environmental sections include UCE and Repol on an aggregated basis, unless clearly stated otherwise.

Investments and environmental improvement projects in 2024.

UCE's investment programme for improvements during the 2024 financial year has reached 7.8 million euros. Some of the most important projects underway, which will be completed in the coming years, are as follows:

- ▶ Completion of a **pilot research plant** for polymers with recycled and bio-based components (circular economy).
- ▶ Procurement of a mechanical **recycling** plant for the production of polyamides (circular economy).
- ▶ Mechanical recompression in the caprolactam purification unit (energy efficiency)
- ▶ Basic studies for pilot plant for the **recirculation of wastewater treatment plant water** (circular economy: reduction of water consumption by using recycled water).
- ▶ Greenhouse gas emission reductions in the production of hydroxylamine sulfate.



4.1 CLIMATE CHANGE

[2.22 / 2.23 / 2.24 / 2.25 / 3.3 / 201.2 / 302.5 / 305.1 / 305.2 / 305.3 / 305.4 / 305.5]

UCE contributes to the fight against climate change and joins international initiatives in this area. In the company, the future is planned in line with the **European Green Pact**¹⁹ and the **Paris Agreement**²⁰. UCE works through the application of tools for energy efficiency management, Greenhouse Gas (GHG) emission reduction projects and circular economy projects, with the aim of achieving decarbonisation and developing a portfolio of products with a circular base and low carbon footprint, in line with the objectives of the European Union.

UCE is committed to achieving carbon neutrality by 2050, which means reaching zero net greenhouse gas emissions in all production processes carried out at the Castellon plant. As a first milestone, the UCE Group's commitment is to achieve a 55% reduction in Scope 1 and 2 emissions by 2030 (base year 2010) as an intermediate step towards carbon neutrality by 2050. This emissions reduction target is in line with the targets associated with the SBTi (Science Based Targets) initiative undertaken by the parent group, UBE Corporation, which requires the adoption of Scope 1, 2 and 3 emissions reduction plans, and which in the specific case of Scope 1 and 2 emissions requires the UBE Group to achieve a reduction of at least 50% by 2030 (referring to the base year 2021).

In addition, the energy intensity and the intensity of its GHG emissions per product, expressed as CO₂ equivalent, will be reduced. In parallel, the UCE Group aims to become a provider of solutions, products and technologies for an increasingly decarbonised society.

(¹⁹) https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_es

(²⁰) <https://unfccc.int/process-and-meetings/the-paris-agreement>

The main lines of action to achieve these objectives will be based on:

- ▶ minimisation of the energy intensity of processes
- ▶ purchase of CO₂ free energies
- ▶ minimisation of the intensity of consumption of non-renewable or exhaustible resources, especially those of fossil origin, and also of natural resources such as water
- ▶ the reduction of GHG emissions in our customers' supply chain through the reincorporation into the production cycle of products that have reached the end of their life cycle, with special emphasis on the reuse of plastic waste.
- ▶ supplying the market with an increasing number of products and solutions that contribute to the reduction of GHG emissions or waste by their end-users.

In relation to the actions carried out in fiscal year 2024, the following should be highlighted:

- ▶ **Scope 3 GHG emissions** for the base year FY2021 were calculated in accordance with the GHG Protocol²¹ in 2022. In order to monitor their evolution, they have been assessed annually since then, albeit with a slight delay compared to the date of preparation of this report, due to the complexity of the calculation.
- ▶ We calculate the **Carbon Footprint of our products** in accordance with ISO 14040-44 standards and in combination with the Ecoinvent V3.7 database, making it available to our value chain.
- ▶ **Energy efficiency** measures in several units to reduce direct and indirect greenhouse gas emissions (improvement of the plant's steam network, replacement of lighting, replacement of pumps and compressors with more efficient equipment).
- ▶ Innovation projects for **circular economy** products in the pilot study phase.

GHG EMISSIONS (UCE + REPOL)	2010 (BASE YEAR)	FY 2022	FY 2023	FY 2024	Change over base year (%)
SCOPE 1	t CO₂e (Tonnes of CO₂ equivalent)				
Fixed combustion	181,370	93,289	84,885	74,765	-59
Mobile combustion	15	326	239	240	
Refrigerant leaks		380	107	247	
Process emissions - Caprolactam	250,121	171,102	195,391	227,443	-9
Total Scope 1	431,506	265,098	280,622	302,696	-30
SCOPE 2					
ELECTRICITY with a market approach	43,980	9,553	44,432	49,092	12
ELECTRICITY with localization approach	33,340	24,482	20,538	18,767	
STEAM	3,882	2,603	3,584	3,297	-15
Total Scope 2 *	47,862	12,156	48,016	52,389	9
TOTAL SCOPE 1 + 2 * (* (Considering emissions from electricity with market-based approach)	479,368	277,254	328,638	355,085	-25,92
SCOPE 3					
Total Scope 3 Total Scope 3 (Categories 1-12 GHG Protocol)	n.a.	928,970	1,145,006	n.a.	

(²¹) <https://ghgprotocol.org/>

The organisation's GHG emissions for the year 2024 and their comparison with the base year 2010²² (indicators 305.1 / 305.2 / 305.3 / 305.5)²³ are shown in the table on the previous page.

The data takes into account the following greenhouse gases: CO₂, CH₄, N₂O and HFCs (there are no CO₂ emissions of biogenic origin).

Scope 1 and 2 emissions values are compared with those of 2010, which has been considered as the base year, due to the fact that it is a representative year in terms of the composition of the product portfolio and given the significant energy efficiency improvements carried out since then, with the consequent reduction in greenhouse gas

emissions. FY2024 Scope 3 GHG emissions are in the process of being calculated.

The 2024 financial year closed with a **25.9% reduction in net Scope 1 and 2 emissions compared to the base year**. This reduction is lower than in the previous year, but in line with the milestones set to achieve full decarbonisation by 2050.

The following table shows the evolution of the ratio of greenhouse gas emissions per unit of product for sale (indicator 305.4) in relation to the base year 2010. During the year, a reduction of 41.97% has been achieved.

EVOLUTION OF GHG EMISSION INTENSITY RATIO	2010 BASE YEAR	FY 2022	FY 2023	FY 2024	CHANGE OVER BASE YEAR (%)
Production for sale (tons)	500,514	494,728	526,604	638,803	27.62
Tons of CO₂ equivalent (Scope 1+2*) / tons of production for sale (* calculation considering CO ₂ emissions from electricity purchase following a market approach)	0.958	0.560	0.624	0.556	-41.97



⁽²²⁾ Calculations have been made following the standards GHG Protocol- <https://ghgprotocol.org/> with an operational control approach. The emission factors have been obtained from the values published by the Ministry for Ecological Transition and Demographic Challenge (MITECO) and accredited laboratory analyses in the case of own fuels; Red Eléctrica de España, for the emissions of energy location approach; and contract and guarantees of origin, for the emission factor of energy with a market approach. The distribution of gases has been made according to the values given by the International Energy Agency (IEA) 2019 Spain and Regulation 2019/331 for the calculation of emissions from external acquired steam.

⁽²³⁾ These data have not been fully verified against the specific requirements of the GHG Protocol.

4.2 CIRCULAR ECONOMY

[2.22 / 2.23 / 2.24 / 2.25/ 3.3 / 306.1 / 306.2 / 306.3 / 306.4 / 306.5]

UCE is firmly committed to implementing a circular economy model that optimises the use of resources, reduces waste generation and promotes the recycling of materials, contributing to environmental and economic sustainability.

3 GOOD HEALTH AND WELL-BEING



During FY2024, the **Circular Economy Policy** has been drawn up, focused on promoting the transition towards a circular economy, encouraging the use of raw materials of circular origin,

seeking the recyclability of the products marketed by the Group and minimising the generation and seeking the recovery of our own waste.



► In line with the development of new products that contribute to achieving the Circular Economy objectives, UBE has continued with the scale-up and commercialisation of the **UBECycle** product line. UBECycle is a recycled polymer line designed to transform industrial waste PEPA or PA film into high quality recycled materials.

Improvement actions in 2024

► UCE has continued to extend the **ISCC PLUS** certificate²⁴, incorporating a new raw material to the certificate, allowing to obtain copolyamides with a higher percentage of circular and/or bio-based material.



► Repol has increased its portfolio of products with UNE-EN15343 certification, which establishes the procedures for the traceability of plastics recycling and the evaluation of conformity and recycled content. Certification according to UNE-EN15343 is essential to ensure quality and transparency in the use of recycled plastics.



► During FY2024, a new pilot polymerisation plant was commissioned to support research into bio-based polymers. Its main objective is to enable the pre-industrial scale-up of the polyamide polymerisation process developed in the laboratory, in order to produce biopolyamides based on monomers of natural origin.

► In the same line, the development and sampling of **bio-based PCD grades** has continued, specifically with two new grades: ETERNACOLL BIO DH-200SA and DH-200SB. In the last financial year, ETERNACOLL BIO DH-200SB was produced in a pilot plant.

► The UBECycle product line has achieved RecyClass certification in accordance with EN 15343:2007. The audited recycling process and associated management systems have met the requirements of the Recycling Process Audit Scheme in accordance with EN 15343:2007 and have the necessary procedures in place to ensure the traceability of recycled plastics.

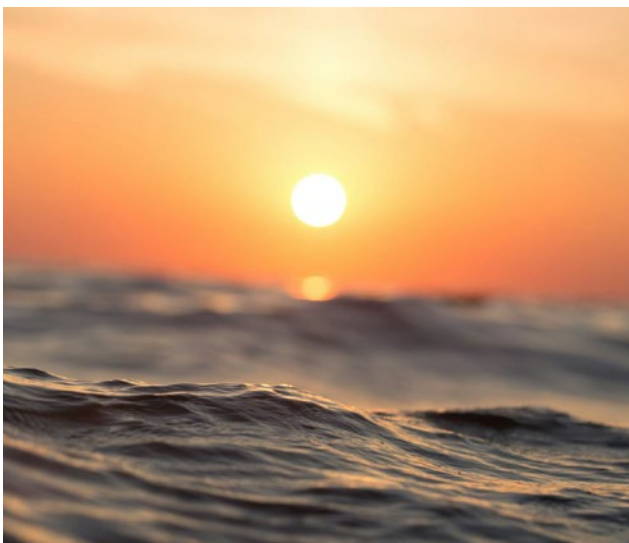
⁽²⁴⁾ <https://www.iscc-system.org/> ISCC PLUS offers a certification that promotes environmentally, socially and economically sustainable production under the mass balance method throughout the supply chain.



U-BE-INFINITY

Blooming a sustainable future

- ▶ During fiscal year 2024, **UBE Corporation** launched a new product brand called U-BE-INFINITY™, which represents UBE's effort to develop products and technologies that help reduce greenhouse gas emissions, conserve resources and contribute to a recycling-oriented society. Products under the **U-BE-INFINITY™²⁵** brand must pass objective and quantitative assessments verifying their environmental impact. During the following year, UBE will carry out internal certification of various products to be categorised as U-BE-INFINITY™.
- ▶ In relation to **solid waste**, UCE is developing a plan to achieve **zero waste to landfill** in the coming years, promoting recovery.



4.2.1 Waste

[306.1 / 306.2 / 306.3 / 306.4 / 306.5]

There are three waste generation production centres: the two industrial production centres of UCE and Repol, and a research laboratory located in the facilities of the University of Valencia.

To carry out the production process of UCE or Repol, the raw materials used can be liquid, received in bulk, or packaged. The production process generates by-products and waste from the process continuously or occasionally, for example, when changing activated carbon or replacing used catalysts. Other waste generated comes from maintenance activities (scrap metal, metal parts, paints, rags, etc.) or urban waste from the canteen, offices, etc. The products dispatched can be sent in bulk or in various types of packaging, such as drums, sacks, large-volume sacks, etc. Waste from this packaging is also collected and processed.

In order to carry out correct waste management, there are clean points for selective collection or specific containers if required. The selective collection is then directed to our own transfer centre, one in each production centre, from where the waste is further segregated, if necessary, prepared and dispensed for dispatch to an authorised waste manager.

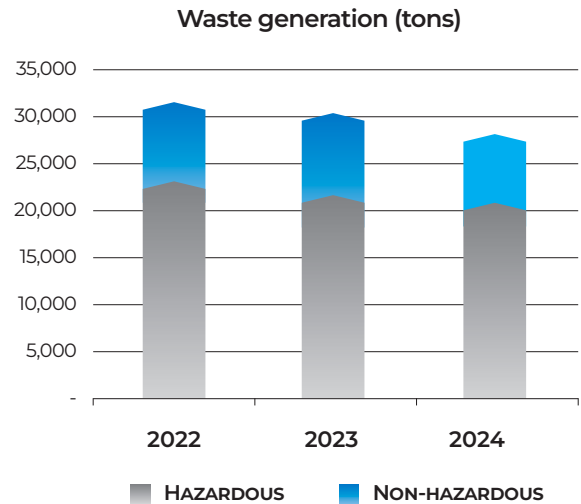
In the case of special waste, the quantity and type of waste to be generated is determined in the work planning and a special collection request is made to the environmental area. This waste is collected in suitable containers or tanks, depending on its nature, and managed externally.

To minimise the impact of waste, internal procedures are in place. A specific plan is in place to minimise the amount of waste going to landfill and increase the amount going to recovery.

⁽²⁵⁾ <https://www.ube.com/lp/u-be-infinity/en/>

WASTE GENERATION (TONS)

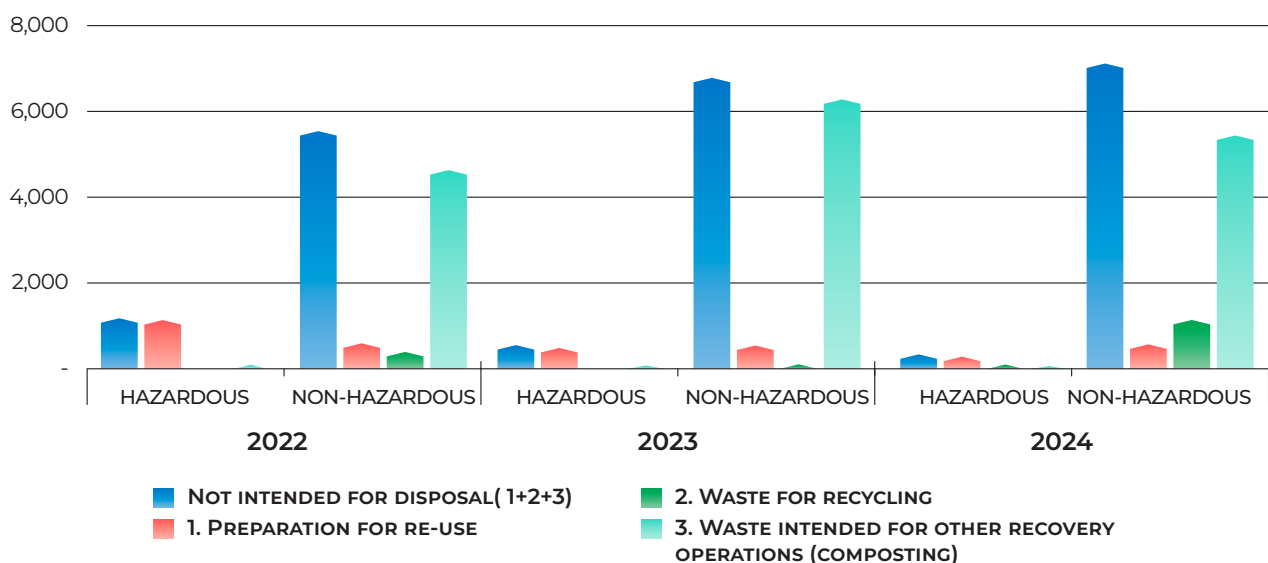
	FY 2022	FY 2023	FY 2024
Total generation	31,489	30,318	28,132
Hazardous	23,064	21,784	20,884
Non-hazardous	8,425	8,534	7,248



WASTE NOT INTENDED FOR DISPOSAL BY RECOVERY OPERATION (TONS)

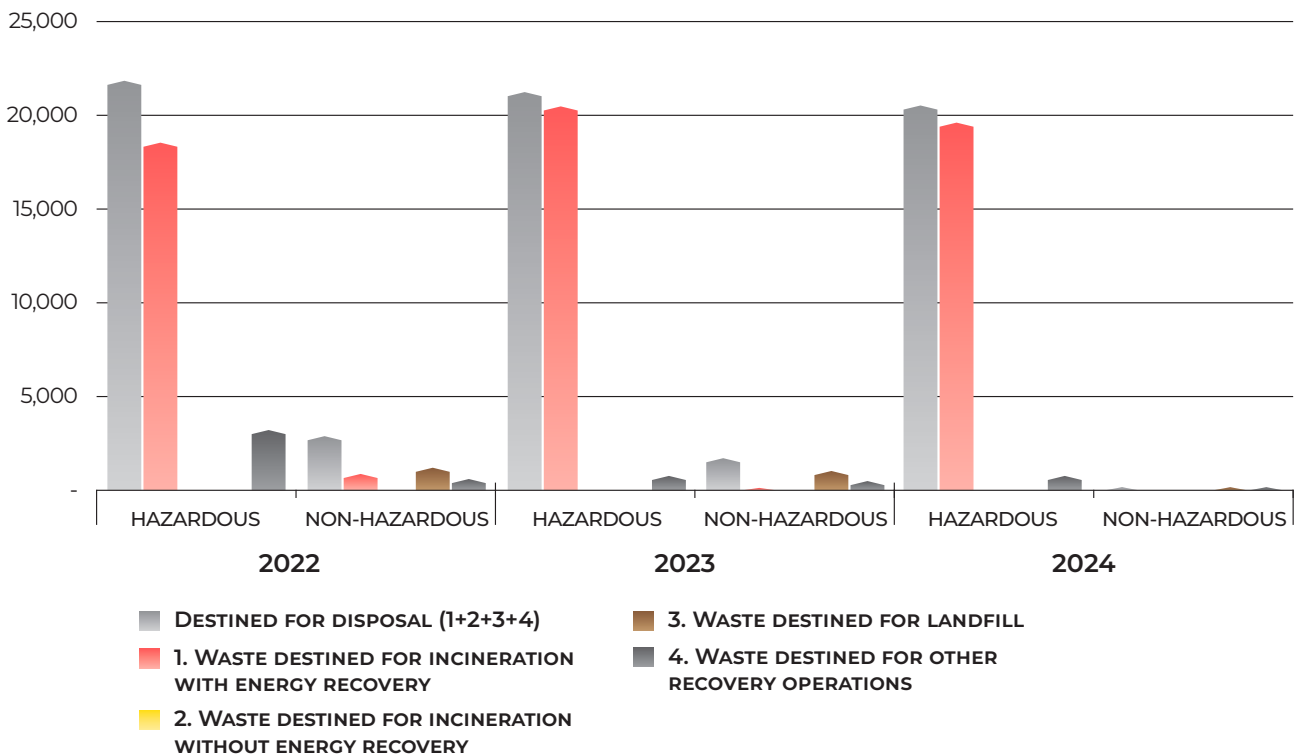
	FY 2022		FY 2023		FY 2024	
	Hazardous	Non-hazardous	Hazardous	Non-hazardous	Hazardous	Non-hazardous
Total	6,663		7,257		7,373	
Not intended for disposal (1+2+3)	1,162	5,501	504	6,753	292	7,081
1. Preparation for re-use	1,103	542	459	502	207	574
2. Waste for recycling	-	339	-	1	50	1,090
3. Waste intended for other recovery operations (composting)	59	4,620	45	6,250	35	5,417

Waste not intended for disposal by recovery operation (tons)



WASTE FOR DISPOSAL BY DISPOSAL OPERATION (TONS)	FY 2022		FY 2023		FY 2024	
	Hazardous	Non-hazardous	Hazardous	Non-hazardous	Hazardous	Non-hazardous
Total	24,826		23,061		20,759	
Destined for disposal (1+2+3+4)	21,902	2,924	21,280	1,781	20,592	167
1. Waste destined for incineration with energy recovery	18,627	972	20,507	128	19,695	-
2. Waste destined for incineration without energy recovery	-	-	-	-	5	-
3. Waste destined for landfill	-	1,309	11	1,055	6	78
4. Waste destined for other recovery operations	3,275	643	762	598	886	89

Waste for disposal by disposal operation (tons)



4.2.2 Food waste

Actions to combat food waste

Companies subcontracted to provide vending machines and canteen services for staff have food waste minimisation programmes in place.



- ▶ Vending service:
 - ▶ Tracking product turnover and units sold
 - ▶ Control of expiry dates at each visit
 - ▶ Review and recall of products with

low consumption or near expiry date

- ▶ Limiting the number of units per lane in slow-moving products
- ▶ Proposal to eliminate products with low turnover in order to avoid waste.

- ▶ Cafeteria service: *Stop Food Waste Program*²⁶, food loss and waste prevention plan in line with Law 1/2025 of 1 April, with the aim of preventing the generation of food waste, applying measures for the appropriate management of surpluses, throughout the production process and under food safety standards ; measurement and recording of the waste generated and its subsequent monitoring and staff training.



4.3 EMISSIONS

4.3.1 Atmospheric emissions

[305.7]

The chemical industry has numerous mandatory or reference documents on Best Available Techniques (BATs), aimed at preventing, controlling, and minimizing atmospheric emissions. Among these documents are the following: the CWW BREF (Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector), the LVOC BREF (Large Volume Organic Chemistry Production), the LVIC BREF (Large Volume Inorganic Chemistry Production), and the WGC BREF (Common Waste Gas Management and Treatment Systems in the Chemical Sector), among others.

The control of atmospheric emissions is carried out by applying Best Available Techniques technologies that minimise the emission of pollutants in the existing sources at the facility and guarantee compliance with the limits set out in the Integrated Environmental Authorization in force and in the regulations applicable in the case of Repol.

Likewise, adapting to BATs implies having the sources of atmospheric emissions well identified and carrying out minimisation within a continuous process and in a way that is integrated into the environmental management system. These actions are carried out in a transversal manner with the collaboration of the different areas involved: production, processes, inspection, maintenance, environment, etc.



(26) [Stop Food Waste Day. We work to reduce food waste.](#)

12 PRODUCCIÓN
Y CONSUMO
RESPONSABLES

ATMOSPHERIC EMISSIONS (TONS)

2022

2023

2024

ATMOSPHERIC EMISSIONS (TONS)	2022	2023	2024
NO _x	442	347	265
SO _x	7.6	9.3	81.6
VOCs (as TVOC)	5.6	5.9	6.9
Particles (PM)	5.6	4.3	13.3

The calculation is made on the basis of the regulatory measurements of the emission sources, except for one of the sources, for which continuous measurements are used, multiplying the emission by the number of operating hours in the fiscal year. When any recorded value is below the laboratory detection limit, that emission is valued as half the detection limit (following the methodology used in the PRTR emissions report).

4.3.2 Noise

UCE shares its perimeter with the company BP Energía España S.A.U., so there is an agreement for the joint assessment of environmental noise. The company has developed a management plan that includes numerous actions aimed at minimising the impact on its surroundings and adapting its facilities to BATs, implementing measures such as:

11 SUSTAINABLE CITIES
AND COMMUNITIES

- ▶ Annual measurements on the external façade of adjacent neighbouring dwellings
- ▶ Annual noise impact study, based on which we identify the sources requiring interventions to reduce noise impact.
- ▶ Equipment acoustic insulation
- ▶ Maintenance plan for equipment and installations to ensure that they operate correctly and with the noise emission levels guaranteed by the suppliers.
- ▶ Implementation of equipment purchase specifications that guarantee maximum noise levels.
- ▶ Soundproofing of air compressor C-032-3
- ▶ Soundproofing of the mechanical vapour recompression compressors of unit U-429
- ▶ Review, together with the occupational risk prevention area, of the existing soundproofing in the plant.

As far as the activity of the Repol production centre is concerned, noise generation does not have a significant impact.



4.3.3 Light pollution

There is no legal requirement to control light pollution at UCE facilities. Actions in this area focus on the maintenance plan for correct operation and replacement with equipment with less environmental impact.

4.3.4 Other environmental vectors

[303.1 / 303.2 / 303.3 / 303.4 / 303.5]

Water

The area of Castellon and Almassora, where the production plants of UCE and Repol are located, are situated in areas of low to medium water stress at present, according to the WRI (Water Risk Atlas) database²⁷. However, the water stress forecast given by WRI for the year 2030 is high and very high for the year 2050.

During the year 2024 the Jucar Hydrographic Confederation declared the "exceptional situation due to extraordinary drought" in the Jucar Hydrographic Demarcation²⁸, including the Territorial Units of Drought of Mijares-Plana de Castellon in a situation of prolonged drought. The City Council

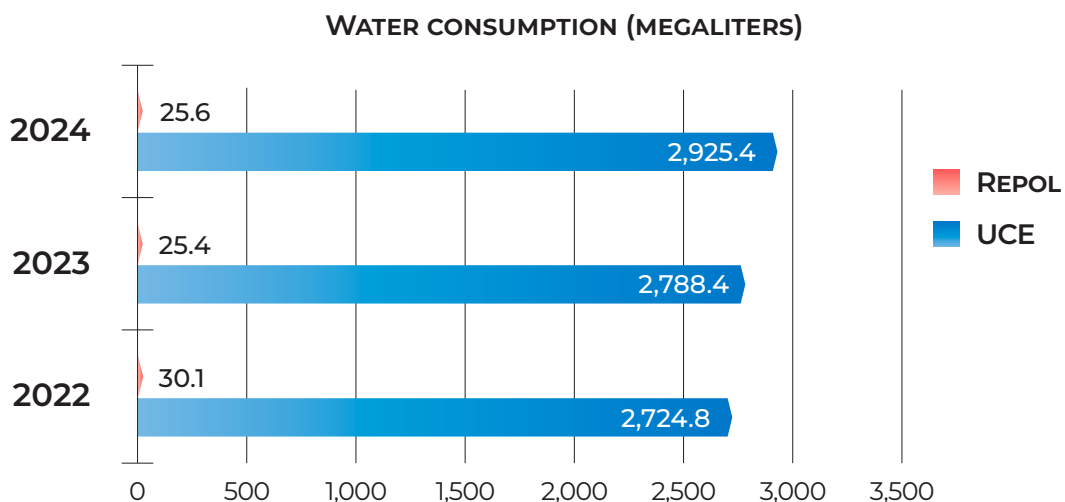
of Castellon de la Plana published the Emergency Plan for drought situations in the urban supply system of Castellon de la Plana in April 2024²⁹, but there were no consequences for industry, as the situation turned back to the pre-emergency status³⁰.

Consumption and emissions to water

UCE and Repol need water for the production process. The main uses are process water, cooling water and water for steam generation. Water is also needed for sanitary use, but to a lesser extent.

UCE receives industrial-quality water from an external supplier, with a high nitrate content, which it treats internally to adapt it to the plant's required uses, as well as chlorinated water for sanitary water uses. Repol, on the other hand, receives chlorinated water, which is used for human consumption and also in the production process. In neither of the two production areas is water abstracted.

Water consumption in FY2024 in UCE and Repol amounted to **2,951 megalitres**.



(²⁷) https://www.wri.org/applications/aqueduct/water-risk-atlas/#/?advanced=false&basemap=hydro&indicator=w_awr...

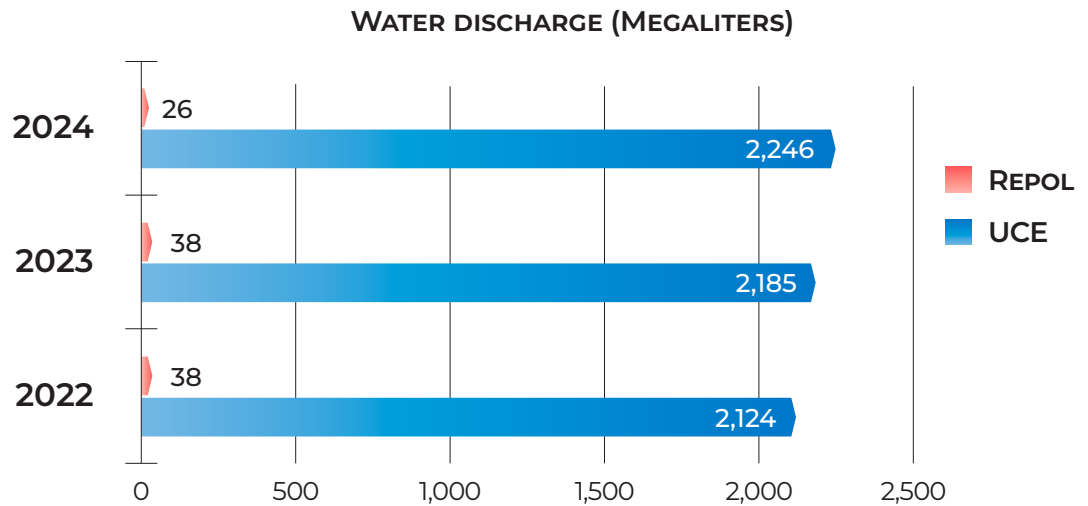
(²⁸) <https://www.chj.es/es-es/medioambiente/gestionsequia/Documents/Informes%20Seguimiento/Declaraci%C3%B3n...>

(²⁹) <https://www.castello.es/documents/35637/3606310/PEM+versi%C3%B3n+definitiva.pdf/7cdeac07-df05-1826-75b...>

(³⁰) <https://castellonplaza.com/castellonplaza/castello-se-situa-en-el-nivel-previo-a-la-emergencia-por-sequia-y-pide-un...>

Once the water is consumed and/or used, wastewater is generated. In the case of UCE, this water is treated in a biological treatment plant and then discharged into the sea, meeting the required discharge quality standards. For Repol,

the water is received chlorinated and discharged into the local sewerage network, complying with the discharge limits set by the municipal ordinance, and is then treated at the Almassora treatment plant.



The management of discharges at UCE focuses on minimising the amount of water consumed and discharged as well as improving its quality to ensure the lowest possible impact on the receiving environment. We consistently work to comply with the requirements established in the Integrated Environmental Authorization and in the Best Available Techniques Reference Document (BREF) for Wastewater in the Chemical Industry, in the case of UCE, and with the criteria of the Almassora Discharge Ordinance, in the case of Repol.

As part of UCE's Environmental Sustainability Plan, a specialized group has been established to manage the complete water cycle. This team, composed of representatives from various plant areas, aims to identify and implement improvements throughout the water management process, including reducing consumption, minimizing discharges, lowering the presence of substances in wastewater, and enhancing the quality of discharged water.

The joint discharge of UCE and Repol in FY2024 was **2,272 megalitres** of water.

4.4 SUSTAINABLE USE OF RESOURCES

4.4.1 Consumption of raw materials

The consumption of raw materials is optimised by continuously monitoring the conversion ratios of the different production units. This monitoring makes it possible to act on the process variables to keep them at their appropriate values and to make adjustments that allow for continuous reduction. This process of continuous improvement is complemented by various projects and investments.

7 AFFORDABLE AND CLEAN ENERGY



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



13 CLIMATE ACTION



Improvement actions in 2024.

Among the actions out in FY2024 related to the improvement of the control of and optimisation of the water process, the following can be highlighted:

6 CLEAN WATER AND SANITATION



- ▶ Replacement of the sludge centrifuge with a screw that consumes less energy and minimises odour emissions.
- ▶ Installation of a pilot plant for the treatment of water generated in the cooling towers, which increases the number of water cycles and minimises discharge.
- ▶ Preliminary studies for the installation of a pilot plant for the recovery of our wastewater.

Odour control

The companies in the El Serrallo Industrial Estate, including UCE, have a protocol for action in the event of odour complaints from local residents, offering a coordinated response to the public and the regulatory bodies.

In relation to the identification, control and minimisation of odours, UCE coordinates this point within the scope of the company's emissions management. This is where the actions to be carried out to minimise possible odour-generating emissions are decided.

Actions for improvement in 2024.

- ▶ Installation of online NIR (*Near-Infrared*) spectrometry technology analysers, with the aim of optimising the purification process through an advanced control system to reduce losses and increase the efficiency of the unit.
- ▶ Installation of a kidney filter in the cooling ponds of the ammonia evaporative condensers to reduce biocide consumption and system make-up water by increasing the concentration cycles.
- ▶ Installation of condenser in organic acid tank vents for vapour recovery.



Caprolactam is the basic product of the UCE plant, on which other outputs such as nylon (obtained by polymerisation of the former) or ammonium sulfate, which is produced as a co-product, depend. In FY2024, total combined production for sales by UCE and Repol amounted to **638,803 tonnes**.

4.4.2 Energy consumption

[302.1 / 302.2 / 302.3 / 302.4]

The UCE Group works continuously, following a strategy aligned with the objectives set by the European Green Deal. Efforts focus on reducing

and optimising energy consumption, which in turn leads to lower emissions. The organisation is committed to responsible energy consumption and to promoting green energy as a starting point on the road to carbon neutrality.

ENERGY CONSUMPTION (MWh)		2010 (CALENDAR YEAR / BASE YEAR)	2022	2023	2024	CHANGE OVER BASE YEAR
a. Consumption of non-renewable fuels*	GN+FO+GO+FG	717,687	346,817	250,708	228,845	-68.11
b. Renewable sources		0	124,832	0	0	
c. Energy consumption						
Electricity (MWh)	Consumption	141,399	163,198	172,955	180,729	27.81
	Renewable origin consumption**	0	124,832	n.a.	4,212	
Heating		n.a.	n.a.	n.a.	n.a.	
Refrigeration		n.a.	n.a.	n.a.	n.a.	
Steam consumption***		17,217	15,244	20,996	19,313	12.17
d. Energy sales						
Electricity		113,232	49,707	9,447	0	
Heating		0	0	0	0	
Refrigeration		0	0	0	0	
Steam		0	0	0	0	
e. Total energy consumption by the organization		763,071	475,553	435,211	428,886	-43.79
Energy intensity		1.525	0.961	0.827	0.671	-56

*For the calculation of the consumption of fuels from non-renewable sources in FY2024, natural gas, fuel oil and diesel have been taken into account, while the base year calculation includes fuel gas (which is not currently used).

**Electricity generated and self-consumed

***External procurement considered.

Since 2010⁽³¹⁾ the energy intensity ratio has decreased by 56% at the plant, as a result of the implementation of process and operational improvements.

4.4.3 Chemical substances

The main chemicals used in the production processes of the UBE plants, with a potential environmental impact are catalysts and organic solvents.

The catalyst is selected taking into account several factors in order to achieve a balance between activity, catalyst selectivity, catalyst lifetime and use of less toxic metals. Organic solvents are recovered by appropriate techniques, purified if necessary and reintroduced into the process or operation, thus improving resource efficiency.

12 RESPONSIBLE CONSUMPTION AND PRODUCTION



(31) From 2010 onwards, numerous projects for the improvement of energy efficiency were undertaken.

4.5 BIODIVERSITY PROTECTION

[304.1 / 304.2 / 304.3 / 304.4]

Repol's activity has no significant impact on biodiversity. UCE's facilities are not located in a protected area or in an area of great value for biodiversity, as they are located in the vicinity of the port of Castellon.

An annual study is carried out by an accredited laboratory to assess the quality of the water and the possible impact of UCE's activity on the area of influence of the outlet of the water treated in the plant's own treatment plant. The **Marine Phytoplankton Analysis, characterisation of benthic communities and bionomic mapping** provides environmental data on the phytoplankton community, marine biocenosis and the state of conservation of the infaunal benthic communities present in the area of discharge and influence of the company's submarine outfall, located to the south of the port of Castellon.

14 LIFE BELOW WATER



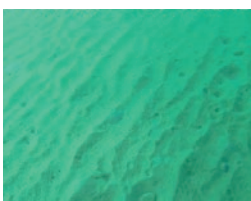
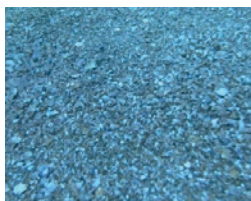
15 LIFE ON LAND



omic mapping provides environmental data on the phytoplankton community, marine biocenosis and the state of conservation of the infaunal benthic communities present in the area of discharge and influence of the company's submarine outfall, located to the south of the port of Castellon.

The following conclusions have been drawn for the 2024 campaign:

- ▶ Absence of Harmful Algal Bloom or "red tide".
- ▶ Potentially toxic or harmful species identified in the samples do not reach cellular concentrations high enough to show negative effects on the environment and/or human health.
- ▶ Absence of high phytoplankton biomass.
- ▶ The marine biocenosis detected in the samples corresponds to the Well-Calibrated Fine Sands Community.
- ▶ The ecological status has been determined to be very good in one of the four sediment samples, good in two of them and moderate in another according to the criteria established for the MEDOCC index.





**5. LABOR AND
SOCIAL ISSUES**

5.1 INTRODUCTION

[2.7 / 2.8 / 3.3]

Human resources management in the UCE Group is based on the **UBE Group's Global Human Resources Policy**, which was formulated in 2015 by UBE Corporation and defines the Group's shared values in human resources management. Although human resources regulations, customs and systems may vary across the different countries where UBE has a presence, this policy establishes the fundamental and long-term approach to management, given that each individual in the workforce is considered the most important and valuable business asset. As a result, the company is committed to:



- ▶ **Valuing diversity** and respecting the individuality of each person
- ▶ **Keep motivation** high, stimulating creativity and autonomy
- ▶ **Provide opportunities** for each person to develop on the basis of their own professionalism
- ▶ Carrying out **fair evaluation and remuneration**
- ▶ Receptiveness to different working styles. Maintenance and improvement **of the working environment**

All staff are expected to meet the following requirements:

- ▶ To be aware of their responsibility in their behaviour as members of the UBE group
- ▶ Communicate proactively inside and outside UBE with a global mindset
- ▶ Drive continuous business improvement, promoting teamwork and innovative thinking.
- ▶ Demonstrate their expertise in each field and work to achieve outstanding results
- ▶ Pursue personal growth through self-transformation and embrace the challenge of exploring infinite possibilities

The company has a track record of **net job creation over the last 10 years** due to the increase in technical and management projects and the expansion of production activity at the Castellon factory, where most of the workforce is concentrated, with a **positive socio-economic impact on the surrounding area**.

In FY2024 UCE outsourced daily factory services in excess of 255³² full-time jobs. In addition, according to estimates by the Spanish Chemical Industry Federation, there is a multiplier factor of 0.67 of induced employment for each direct job in the sector³³, contributing to the additional generation of employment through other services such as engineering, consultancy, legal advice, logistics, transport and storage services, waste management, specialised services, catering, banking, etc. Applying this factor to the workforce of 473 people at the UCE factory would result in 316 induced jobs.

JOB CREATION	TOTAL CONSOLIDATED WORKFORCE	WORKFORCE AT THE PARENT COMPANY (UCE)	WORKFORCE IN SUBSIDIARIES
as of 31.3.2024	621	491	130
as of 31.3.2025	593	473	120

⁽³²⁾ Contractor personnel provided services for a total of 447,528 hours and the annual working time according to the sectoral collective agreement is 1,752 hours.

⁽³³⁾ <https://www.feique.org/radiografia-economica-del-sector-quimico-espanol/>

5.2 HEALTH AND SAFETY

[2.26 / 3.3 / 403.1 / 403.2 / 403.4 / 403.8]

The main **impacts related to occupational health and safety** are the effects of possible accidents or natural disasters affecting the headquarters, mainly the production plant in Castellon, as well as effects on the activity due to a loss of information or a cyber-attack.



UBE Corporation Europe is firmly committed to the health and safety of employees and contractors, as expressed in its **Management Policy**, promoting consultation and participation. It is part of the integrated

management system, certified in accordance with the **ISO 45001** standard and translates into making the necessary efforts to prevent risk situations and, when faced with them, to be prepared and act effectively. There is also an **Occupational Health Promotion Policy**, which commits the company to develop actions in the mental, physical and social spheres of health, facilitating participation in them and the resources for their organisation, prioritising those of a preventive nature. Safety performance is continuously assessed and plans are established to improve results over time.



Ensuring safe working conditions in all areas and activities for employees and contractors is a priority for the UCE Group, in accordance with the following principles:

- ▶ Use of proactive tools to identify hazards, assess and eliminate, or if not possible, mitigate the risks
- ▶ Up-to-date training programmes and use of new technologies, such as virtual reality simulator
- ▶ Consultation of workers and promotion of their participation in safety matters

Improvement actions in 2024.

▶ Repol managed to complete the year with **zero accidents involving** own and contractor personnel and UBE, with zero accidents involving own personnel.

▶ At Repol, 123 preventive safety observations (**PSOs**) and **4 safety meetings** have been carried out as good preventive practices.

- ▶ Incident reporting, analysis and dissemination of lessons learned
- ▶ Leading by example. Recognition for dedication to health and safety at work



The following mechanisms and tools have been established for the consultation and participation of workers in relation to occupational health and safety:

- ▶ Health and Safety Committee (at UCE and Repol)
- ▶ Group safety, health and environment meetings
- ▶ Specific procedures, available to employees and contractors, for communicating risks and reporting incidents and occurrences to line management, safety and environmental engineering staff (ISMA) or prevention delegates.
- ▶ Risk analysis, preventive safety and environmental observations, and safety inspections.
- ▶ Proposal for health and safety improvements according to the internal Change Management procedure.



In order to facilitate the **information and consultation process**, the UCE Group has the following internal communication channels:

- ▶ IntraUbe (intranet)
- ▶ Notice boards (at UCE and Repol)
- ▶ UBConnect (corporate app, available throughout the group)
- ▶ Digital signage system (at UCE and Repol)

The risk assessment of job positions is carried out using the risk matrix of the National Institute for Safety and Health at Work, while also applying other analysis and control tools such as

safety inspections, preventive safety observations, job safety analysis, and work permits. Since 2016, UCE has had its own software to manage these assessments, with the aim of being more agile in their preparation and modification, as well as improving their content. Process safety studies are carried out as mentioned in section 2.5 of this report.

At Repol, new occupational risk assessments were completed in 2024, and as part of the management improvements, safety meetings have been set up. The attached table shows the analysis and prevention tools planned and implemented in both companies.

In the field of **industrial safety**, UCE has carried out the annual inspection with favourable results, in accordance with the Serious Accidents regulation (RD840/2015), in which the Safety Management System (SGS) is evaluated, as well as the regulations applicable to the facilities in accordance with the Industry Act (Law 21/1992).

In terms of process safety, UCE continues to support initiatives endorsed by best practice guides and international standards of recognised prestige in the petrochemical sector. Other elements of the process safety management system (PSM) include the implementation of process hazard identification (PHA) techniques, the implementation of safety instrumented elements (SIL), specific training in process safety at different levels in the organisation, as well as the investigation of process incidents, including those classified as quasi-incidents (Tier 3).

2024	PREVENTIVE SAFETY OBSERVATIONS		SAFETY INSPECTIONS		SAFETY & ENVIRONMENTAL MEETINGS BY DEPARTMENTS	
	Planned	Performed	Planned	Performed	Planned	Performed
UCE	245	268	42	42	235	238
Repol	123	127	N/A	N/A	4	4

5.2.1 Safety and health at work

[403.2 / 403.3 / 403.4 / 403.5 / 403.7]

The company has a **Strategic Safety Plan** and a **Central Safety Committee**, through which continuous improvement activities are promoted and multidisciplinary working groups are organized to enhance the approach to health and safety. Within the safety management system, as a tool for achieving excellence, the **Safety Standards Manual** stands out. It includes guidelines for developing the annual program of preventive safety and environmental observations (OPS) and provides a guide for their implementation.

The result of these actions is the identification of deficiencies that could affect staff health and safety. Another fundamental pillar in the prevention of occupational risks, aimed at providing a safe environment for workers, is **training in occupational health and safety**. Initial and periodic training in this area is defined through the job-specific training matrix for all our own staff. To reach

all workers, not only employees, all contractor personnel must complete an initial safety course covering process-related risks at UCE, emergency measures, and main occupational health and safety regulations. This certification is valid for one and a half years. UCE provides health and safety training for new employees, continuous refresher training for staff, and training for contractors.

UCE has set up a **joint prevention service** with the company BP Energía España S.A.U. The **Medical Service** or Clinic constitutes a Basic Health Unit in accordance with RD 843/2011 on the development of the health activity of prevention services and carries out health monitoring of staff by observing working conditions and the effects of these on the worker. The aim is to provide effective protection against the risks inherent in each job, complying with the legal requirements in terms of Occupational Risk Prevention. Repol has an external prevention service provided by the company Euro-preven SPRL



5.2.2 Work-related accidents

[306.3 / 403.9]

The main occupational health and safety objectives are to achieve zero lost-time injuries and to reduce the number of process safety incidents due to loss of containment.

In 2024, there were no fatal accidents in the Group and no cases of occupational illness or accidents were reported at the German, Mexican and Brazilian sites. The reported accident rate at UCE indicates that approximately 1 in 5 incidents at the plant is likely to cause some kind of personal injury, showing on the one hand that the vast majority of incidents are reported, and on the other hand, that it is necessary to further increase

the safety culture at UCE, extending the model to Repol as well.

The **Process Safety Events Index** is an indicator established voluntarily at UCE, related to the effective safety of production processes. It measures the number of incidents involving leakage or loss of material containment in relation to the hours worked. Incidents are classified as *Tier 1, Tier 2 or Tier 3*, depending on the quantity and hazardousness of the substances, according to the recommendations of the *Center for Chemical Process Safety (CCPS)* based on API 754.³⁴

In **process safety** performance in 2024, the maximum target value was not exceeded, as there was only one loss of containment in which DMC-methanol spilled onto the plant floor and into the manhole network via the discharge vent of a pump associated with one of the process

HEALTH AND SAFETY PERFORMANCE

UBE CORPORATION EUROPE

	FY 2022	FY 2023	FY 2024
Effective Process Safety Index	0.83	1.84	1.7
Process Safety Index Target	8	8	8
Accident ratio (*)	21.4	18	19
Frequency index (**)	18.81	7.34	10.99
Severity index (***)	0	0	0

REPOL

	FY 2022	FY 2023	FY 2024
Process Safety Index	n/a	n/a	n/a
Accident ratio (*)	62	50	58
Frequency index (**)	101.01	50.89	54.61
Severity index (***)	0.85	0	0

(*) Accident Rate Ratio = [(first aid cases + lost-time accidents + non-lost-time accidents) / reported incidents] × 100
 (**) Frequency Index = [(first aid cases + lost-time accidents + non-lost-time accidents) / number of hours worked] × 10⁶
 (***) Severity Index = [man-days lost / number of hours worked] × 10³

⁽³⁴⁾ <https://www.api.org/products-and-services/standards/important-standards-announcements/754>

tanks. The spill did not have any consequences for human health or the environment. This incident was classified as *Tier 1* following the subsequent investigation carried out by the investigation committee, which determined the root causes and the necessary measures to prevent a similar incident from occurring again.

With regard to accidents at work and occupational diseases, the UCE Group investigates all incidents using different techniques to determine the basic causes. Incidents distinguish between own staff and contractors, classifying accidents as first aid, accidents without sick leave and accidents with sick leave.

During 2024, there were no occupational accidents with or without sick leave among UCE's own staff, while contractors accounted for 1 accident with sick leave and none without sick leave. A total of 9 first aid services were provided. At Repol, there were 4 accidents among the company's own staff without sick leave and none with sick leave, while the contractor staff had no accidents with or without sick leave. The company has investigated the root causes of each event and has implemented a series of improvements and reinforcements in training to avoid recurrence.

BREACKDOWN OF ACCIDENTS BY SEX (SPAIN)

FISCAL YEAR	FIRST AID		ACCIDENTS WITHOUT SICK LEAVE		ACCIDENTS WITH SICK LEAVE		FIRST AID CONTRACTORS		ACCIDENTS WITHOUT SICK LEAVE CONTRACTORS		ACCIDENTS WITH SICK LEAVE CONTRACTORS	
	W	M	W	M	W	M	W	M	W	M	W	M
UCE 2022	0	7	0	1	0	0	0	7	0	1	0	1
UCE 2023	0	5	0	0	0	0	0	7	1	0	0	0
UCE 2024	0	8	0	0	0	0	0	4	0	0	0	1
Repol 2022	0	7	0	4	0	2	0	0	0	0	0	0
Repol 2023	0	4	0	2	0	0	0	0	0	0	0	0
Repol 2024	0	2	0	4	0	0	0	0	0	0	0	0



5.2.3 Occupational diseases. Health promotion.

[403.6 / 403.10]

No cases of occupational illness were recorded in 2024. UCE has a joint medical service that provides 24-hour care for all its own and contractor personnel.

The **UBE Healthy** programme, launched at UCE in 2017, was recognised by the National Institute for Safety and Health at Work (INSST) during the 6th Meeting of the Spanish Network of Healthy Companies (REES) held in December 2021. The programme aims to preserve and promote health by encouraging healthy lifestyle habits, focusing on the three areas of health: mental, social, and physical.

In the physical area, four lines of work have been defined: physical activity, healthy eating, smoking cessation and disease prevention. In the social area, volunteer and social participation initiatives are promoted, generating a positive impact on employees, their families and society as a whole. Finally, in the mental area, preventive actions are implemented to provide employees and supervisors with specific tools for better guidance and self-management.

UBE Y SU PLANTILLA
Fundada en 1957, UBE opera en la planta 403.000 m² en el Puerto de Castellón. En UBE producimos y distribuimos productos químicos de alto calidad y tenemos soluciones tecnológicas innovadoras para la industria (agrobiotecnología, química fina, agua y biofarmacia).

Personas de UBE: 487
272 hombres / 115 mujeres
20,33% menores de 30 años / 79,67% mayores de 30 años

MOTIVACIÓN
El futuro de la empresa está ligado al nivel de su equipo humano y su rendimiento.
Actúa en los 3 ámbitos de la salud (física, mental y social), promoviendo la productividad y participación de la empresa.

EL CAMBIO A UNA EMPRESA MÁS SALUDABLE EMPIEZA POR TI
PROGRAMA DE SALUD FÍSICA, MENTAL Y SOCIAL.

EVALUACIÓN DE RESULTADOS
+0,7% Menor riesgo cardiovascular
+100% Uso de beneficios de salud
-14,9% Menos accidentes
+55,25% Uso de los beneficios sociales
-9,5% Menos fumadores
-0,37% Absentismo
+7,4% Plantilla que practica deporte al menos regular

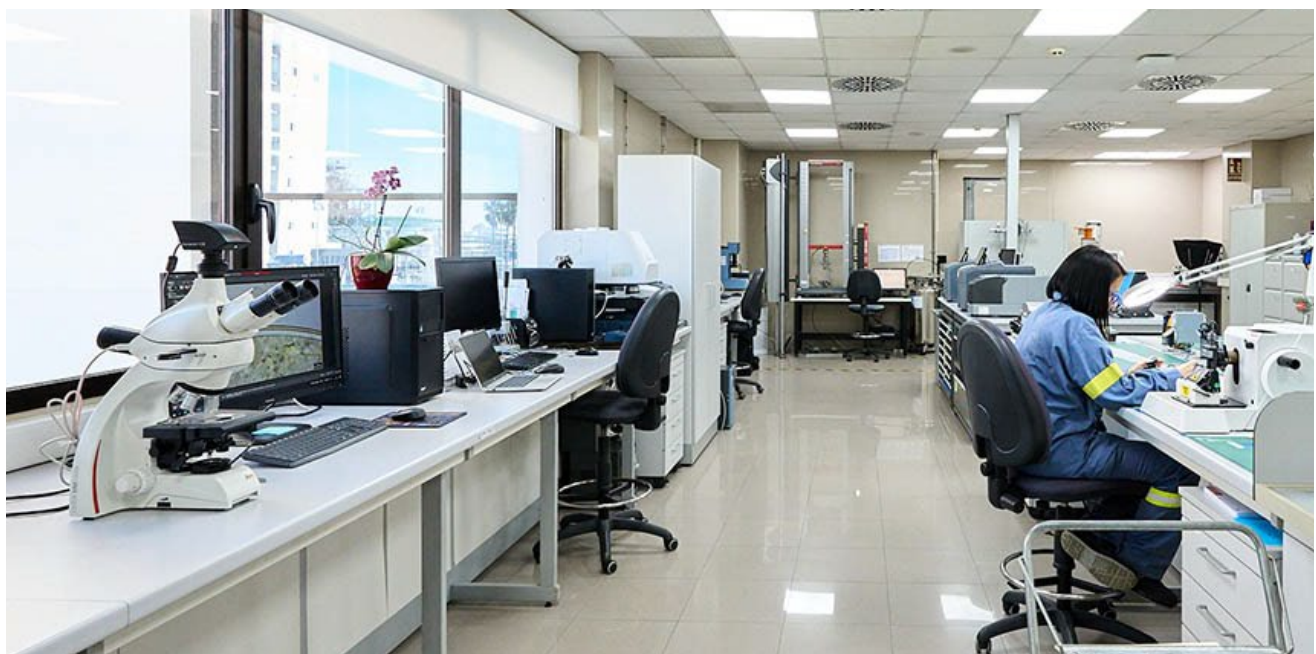
ESTRATEGIAS Y PROGRAMAS
- **Prevención del riesgo cardiovascular**
- **Alimentación saludable**
- **Actividad física**
- **Programa tabaquismo**
- **Prevención de enfermedades de origen no laboral**

PREVENCIÓN DEL RIESGO PSICOSOCIAL
- Programa **WELLNESS** (ACTIVO)
- Programa de apoyo al diagnóstico, servicios de orientación psicológica 24/7 (PSICOACT)
- Programa de evaluación e intervención psicosocial
- Seguimiento del estado físico de bienestar y del nivel de estrés y emociones (ET Linea)
- Evaluación de bienestar emocional en el momento médico anual (Protocolo PSICOVIDE01)
- Encuesta sobre salud de la DT

ACCIONES SOCIALES
- Iniciar a plantilla y familias en los cursos de bienestar que ofrece la empresa.
- Participación en las iniciativas de la plantilla que usa los beneficios sociales.
- Programa de donación de sangre, alimentos y ropas de la compañía.
- Día de salud.
- Política de flexibilidad corporativa.
- Política de flexibilidad horaria y familiar.
- Grupo de empresa.
- Política de flexibilidad horaria.
- Beneficios sociales para empleados y pensiones.

LECCIONES APRENDIDAS
- La mejora en el estado físico de bienestar y el nivel de estrés y emociones (ET Linea) se ha mejorado.
- Se ha mejorado el uso de los beneficios sociales.
- Se ha mejorado el uso de los beneficios sociales.
- Se ha mejorado el uso de los beneficios sociales.

SOSTENIBILIDAD Y TRANSFERIBILIDAD
- Mantener y mejorar los niveles alcanzados.
- Nuevos indicadores para mejorar la evaluación de progreso.
- Acciones específicas por grupos de interés (stakeholders) más.
- **INICIATIVAS TRANSFERIBLES:**
- Implantación de grupo de empresa (deporte, viajes, comida especial, etc.).
- Política de flexibilidad horaria.
- Beneficio de apoyo familia (autorización de licencias salda por día de actividades).
- Beneficio con modalidades flexibles de acceso.
- Desarrollo del código ético y de conducta y del canal de denuncia y denuncia.





UBE Healthy: Good Practices in Health Promotion – Examples from the Mental Area.

To support and improve employees' mental well-being, the company provides several tools within the framework of the occupational risk prevention system and the transversal UBE Healthy programme.

Psicomet is a protocol integrated into the annual health monitoring programme to assess stress levels and detect psychosocial health risks early, whether or not they originate in the workplace. This enables the activation of the necessary measures to mitigate these risks before they develop into health problems.

The Employee Assistance Programme (**PAE**) offers free psychological support to employees through consultations with experts, aimed at helping to redirect situations or relationships that cause emotional discomfort, whether in the work, family, or social environment. Individual consultations with the service continue to be mostly personal in nature, particularly related to family matters. The service received nine consultations in 2024.

Staff participation at **Emotional Health Care** campaign activities remains at the same high levels as in 2024, showing that the company's commit-

ment to providing employees with tools for psychosocial management continues to be well received. In 2024, a series of webinars, educational videos and practical workshops for improving health care in various fields were made available to staff, with the possibility of attending live online or watching a video or presentation afterwards:

- ▶ Anxiety management at work
- ▶ DANA, psychological support in emergency situations
- ▶ How to manage conflict emotionally
- ▶ Emotional Intelligence; Managing Emotions at Work
- ▶ Combating perfectionism and self-demanding
- ▶ In the pause lies the magic: responding vs. reacting
- ▶ Adapting better to change
- ▶ Hand exercises to exercise the creative hemisphere
- ▶ Relaxation techniques; Techniques for managing worries
- ▶ Sleep hygiene; Healthy eating
- ▶ Motivation and its importance in the workplace

5.3 SOCIAL RELATIONS

5.3.1 Social dialogue

[2.26 / 3.3 / 407.1 / 408.1 / 409.1]

The **material issues in the social and industrial relations field** are those related to talent management and retention; working conditions and social benefits; professional development and specialised training; and equality and diversity management. **Potential negative impacts**



would be due to the lack of sufficient and well-trained human capital, or inadequate management of social issues that could lead to conflict.

People are the brains and the engine of sustainable growth in the medium and long term and the **Global Human Resources Policy** is based on guaranteeing dignity and personal development, through management by objectives, equality plans, reconciliation measures, teleworking, flexibility and other aspects of labour relations.

Moreover, the **Management Policy** enshrines the direction of human resources towards building an agile and educated organisation with skilled and knowledgeable teams, and the preservation of the safety and health of staff working in the facilities.

Other measures, such as the organisation of functions, internal and external training, internal communication and the analysis and improvement of productivity, allow the company to accompany the process of transformation and continuous improvement. Some future challenges in the area of human resources include:

- ▶ Progressively aligning personnel policies across the UCE Group's subsidiaries in the areas of training, performance management and career development.
- ▶ Developing staff potential for global leadership within the UCE Group, while preserving accumulated knowledge and expertise, as well as the company's values and identity.

In order to share information and promote meaningful and fluid communication, there are multiple channels with workers and their legal representatives, as mentioned in section 5.1. In these tools, which are accessible to all personnel, information is frequently published on aspects of safety, health, protection, welfare measures, news and activities of the parent company and subsidiaries, training, corporate issues, etc., and there are various sections to encourage participation.

In addition to the Works Council, general **queries and suggestions can be submitted** through the supervisory line or Human Resources staff and escalated to higher decision-making levels or other departments. The working committees for Human Resources and economic monitoring, Equality, Operational discipline, Approval of improvements, Occupational health and safety, Operational safety and security and Safety improvements, among others, allow aspects of business management to be combined with greater transparency and communication flow and enable the participation of personnel related to certain functions or projects.

The group's website is a general communication vehicle that provides the public with information on the company's policies, management principles and certifications, main objectives and achievements, products and their applications, etc.

5.3.2 Collective agreements

[2.19 / 2.20 / 2.30 / 201.3 / 401.2
/ 407.1 / 408.1 / 409.1]

UBE Corporation Europe is subject to **Spain's General Chemical Industry Agreement**. Within this overarching framework, company-specific agreements are established to further improve the conditions set out in the aforementioned agreement. 2024 was the first year of validity of the XXI General Chemical Industry Agreement. Dialogue and consensus have always guided labour relations within the company, forming the basis in recent years for significant progress in areas such as the organisation of work in five shifts, training, social benefits, workforce growth, and the promotion of equality. The most recent agreements reached with the UCE works council covered fiscal years 2021, 2022, and 2023, and an agreement for the next three years is currently being finalised.

The works council is made up of 13 people and its functioning is regulated by article 84 of the current General Chemical Industry Agreement. The role of the trade union delegate at the Castello work centre is also recognised, representing the trade union section of the organisations present at the centre, with the powers and obligations established by law.

Repol has a works council of five people and is also governed by the General Chemical Industry Agreement, with 100% of the UCE Group's staff in Spain being subject to collective company agreements, with improvements over the aforementioned general agreement. The balance of the agreements is positive and their balanced application has allowed for a fluid relationship of social dialogue.

UBE Europe GmbH (UEG) does not belong to any employers' organisation and there is no collective bargaining agreement applicable to it, so that staff are not subject to a collective bargaining agreement, but are subject to the labour laws applicable in each region and at state level, with terms and conditions being agreed between management and staff. The particular

salary conditions are agreed with the new employee at the time of recruitment according to his or her specific circumstances, but always within the range of other comparable hires, and with the advice of external recruitment companies. Annual increases in staffing levels, working hours, etc. are authorised by the company's management committee.

UBE Latin America Serviços (ULA) takes as a reference for the annual wage update the collective agreement of the employers' association *Sindicato dos Empregados de Agentes Autônomos do Comércio e em Empresas de Assessoramento, Perícias, informações e pesquisas e de Empresas de Serviços Contábeis no Estado de São Paulo*.

UBE México S. de R.L. de C.V. (UMEX) does not belong to any employers' organisation and there is no mandatory collective bargaining agreement in its case, the staff being subject to the applicable labour laws and there being an agreement of conditions with the management.

Pension plan.

[201.3]

In accordance with Spanish social security laws and regulations, the UCE Group contributes via payments to the national pension system, the payment of which is the responsibility of the State. In the case of UCE, a **jointly promoted Pension Plan** was set up in 1990 on a complementary and voluntary basis, registered in the Administrative Register of Pension Funds of the Ministry of Economy and Finance under number F0214, with participants being those permanent employees with a minimum length of service of at least one month who voluntarily join. Its purpose is to improve the General Social Security Scheme, in order to provide retirement, disability, widowhood, orphanhood and inheritance benefits to beneficiaries, and it is governed by the Pension Plans and Funds Regulation Act, its Regulations and other applicable legislation. The plan is supervised and controlled by a control committee made up of twelve people. To cover savings bene-

fits (retirement), the promoter's contribution in 2024 was 2.5% of total salary and the participant's contribution was 0.6%. Participants can make voluntary contributions up to the limit set by the legislation in force at any given time.

Group insurance. Study assistance schemes. Social fund. Other aid.

[401.2]

The company has group life and accident insurance policies.

The **study allowance** scheme applies to staff with a length of service of more than 12 months and allows for the reimbursement of up to two thirds of the study expenses of the person employed by UBE, with a maximum of 2,000 euros per year or academic year. In the case of aid for school or university studies for the children of employees, the ceiling is 4,500 euros for the entire course of study.

The main objective of the **Social Fund** is to stimulate collective safety awareness, obtaining, depending on the collective safety results, economic contributions that will constitute a fund for welfare and commemorative purposes. The contributions are conditional on the absence of occupational accidents with sick leave, in accordance with UCE's philosophy. The fund is intended for the granting of financial assistance, not provided for by any other UCE social plan, and for the commemoration of milestones related to

safety at work and characterised by the absence of lost-time accidents. From the Social Fund, employees can apply for loan grants up to an amount of €5,000.

Other existing support for staff includes:

- ▶ **Childcare** assistance scheme for employees' children: payment of a maximum of €70 per month for the costs incurred in enrolling children in nursery schools. Also subsidised is €25 per week for the enrolment of children in nursery schools during non-teaching periods.
- ▶ Compensation of **interest on personal loans** (subject to certain seniority requirements in the company). This consists of the payment of part of the interest paid by the beneficiary employee to a financial institution, derived from the subscription of a personal loan. 100% of the interest is subsidised when the loan is requested for consumer goods related to energy or environmental efficiency.
- ▶ **Loans** for the purchase of cars or housing (subject to certain length of service requirements).
- ▶ **Health insurance** for employees and family members. The company subsidises €10 per month of the employee's health costs.

The **total capital allocated to these social benefits** by UCE for the financial year 2024 was **255,137** euros. Of this, 121,563 euros were allocated to study grants for the children of a total of 245 employees.

SOCIAL BENEFITS UBE CORPORATION EUROPE	Total 2024 (€)	No. of employees benefited	Men	Women
Study aid for employees	17,229	32	19	13
Study aid for children	121,653	245	188	57
Interest compensation	39,178	81	65	16
Childcare assistance	28,359	113	79	34
Health insurance aid (subsidized cost for employees and directors)	48,719	222	167	55
TOTAL	255,138			

**DESCRIPTION OF SOCIAL BENEFITS
IN UCE GROUP COMPANIES**

	UEG	ULA	Repol
Food tickets (when eating at work)	Yes	Yes	Yes
Travel expenses to the office or garage parking cost	Yes		
Travel expenses (partially)		Yes	
Drinks in the office (tea, coffee, water)	Yes		Yes
Accident insurance	Yes		
Luggage insurance	Yes		
Height adjustable table (office)	Yes	Yes	Yes
Work-related courses (with limits)	Yes	Yes	
Financial aid for marriage celebration, child birth	Yes		
Compensation for sickness expenses of children	Yes		
Daycare expenses (with justification)		Yes	
Health and dental insurance		Yes	Yes



5.4 LABOR

5.4.1 Employees

[2.7 / 2.8 / 202.2/ 403.8 / 405.1]

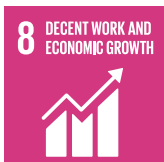
Structure by professional groups and functional levels

The UCE Group has a total of 593 employees with the following distribution.

COMPANY	MEN	WOMEN	TOTAL	% WOMEN
UBE Corporation Europe	369	104	473	22
Repol	57	16	73	22
UBE Europe GmbH (UEG)	22	15	37	40
UBE Mexico (UMEX)	1	1	2	50
UBE Latin America (ULA)	4	4	8	50

UCE, COMPOSITION OF THE EXECUTIVE COMMITTEE

Sex	Men	Women	
n° of persons	10	2	
Age	<30 years	30-50	>50 years
n° of persons	0	3	9
Recruitment area	Spain	Outside Spain	
n° of persons	10	2	



The **Personnel Rules Manual** regulates the working relations between UCE and its employees, with aiming to adapt the company's specific characteristics to current legislation and to formalise in a single document all aspects of UCE's employment framework, conduct guidelines and specific practices that define the rights and obligations of both parties.

The professional structure responds to the demands of the work and production organisation system, ensuring adaptability and optimisation in the use of available resources, as well as

supporting the economic and professional progression of personnel. **Polyvalence and professional training** are promoted to achieve the highest levels of efficiency in human resource allocation and to foster job versatility and professional development so that employee feel integrated and recognised professionally and in terms of remuneration.

UCE has a **professional classification** with nine categories, of which levels 0 and 7 include management levels and levels 1 to 6 include different professional groups, with level 55 reserved

for special situations, such as foreign or expatriate staff temporarily working from Spain. At Repol, the categories range from 1 to 8, with level 0 corresponding to senior management³⁵.

Functional levels are intervals of classification that make it possible to group horizontally different degrees of responsibility and organisational content, determining the degrees of professional promotion and the equivalence of remuneration to the salary scales. Belonging to a professional group qualifies for the performance of a typology of posts, according to the established equivalence between groups and levels. Each level has an associated pay reference.

External personnel

[402.1 / 403.8]

The number of external workers at UCE's facilities is highly variable and depends on the maintenance schedule of the facilities as well as the planning of ongoing projects. The average in FY2024 was more than 255 people. All contractors and subcontractors providing services at UCE's facilities comply with the requirements set out in UCE's general terms and conditions for contracting services, in accordance with established regulations.

The coordination of business activities and work permits in the plant are carried out through the CTAIMA platform, which provides this service to the chemical sector at national level.

Promotion and professional development

[402.1]

Career and pay progression within the designed career structure has two trajectories:

► **Upward or professional promotion.** This involves a rise in functional level as a result of the development of functions or the performance of



posts at a higher level of responsibility.

► **Horizontal or career development.** This consists of professional and economic progression within the same level of responsibility.

Both promotion and career development involve consolidating the professional and remuneration situation that is achieved.

► **Substantial modification of individual working conditions:**

The decision to substantially modify working conditions on an individual basis must be notified by the company to the affected worker and their legal representatives at least fifteen days prior to its effective date.

► **Substantial modification of collective working conditions:**

Without prejudice to the specific procedures that may be established in collective bargaining, the decision to substantially modify collective working conditions must be preceded by a period of consultation with the legal representatives of the workers, lasting no more than fifteen days, which will deal with the reasons for the company's decision and the possibility of avoiding or reducing its effects, as well as the measures necessary to mitigate its consequences for the workers affected. The consultation shall take place in a single special negotiating body, although, if there are several workplaces, it shall be confined to the workplaces affected by the procedure.

⁽³⁵⁾ See the description of the occupational groups in Annex 1.

PROFESSIONAL CLASSIFICATION UBE CORPORATION EUROPE

Professional group	0	1	2	3	4	5	6	7	55	Total
Men	7	109	89	64	43	31	14	9	3	369
Women		15	32	17	21	12	4	3		104
Total	7	124	121	81	63	43	18	12	3	473
% Women		12	26	21	33	28	22	25		22

PROFESSIONAL CLASSIFICATION REPOL

Professional group	1	2	3	4	5	6	7	8	Total
Men		1	19	16	11	3	6	1	57
Women			1	8	6		1		16
Total		1	20	24	17	3	7	1	73
% Women			5	33	35		14		22

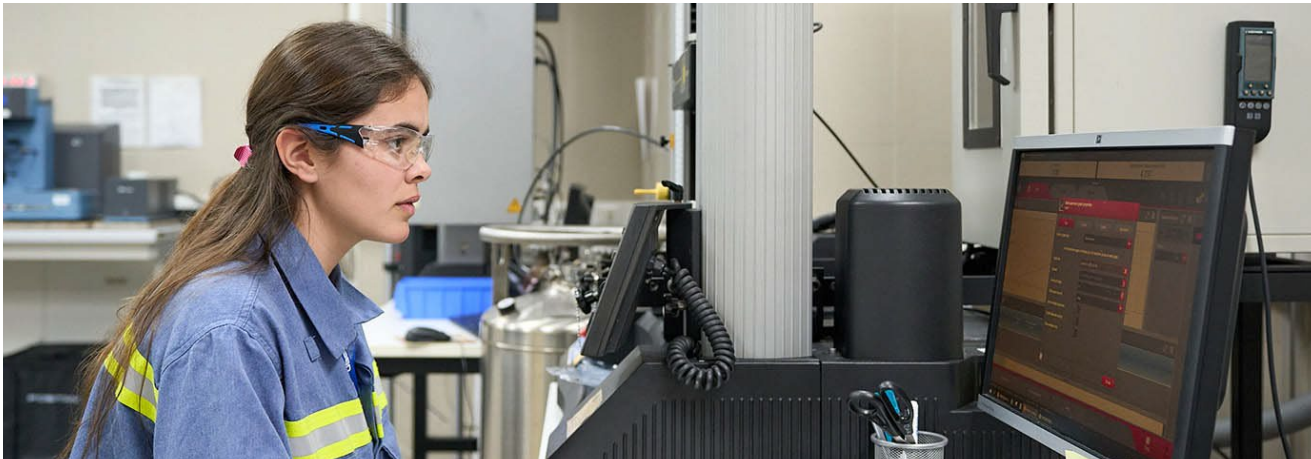
UBE EUROPE GMBH (UEG)

	MEN	WOMEN	TOTAL
Corporate / finance	4	1	5
Machinery	5	1	6
Specialties and products	4	8	12
Performance polymer	9	5	14
Grand total	22	15	37
%	60	40	

UBE LATIN AMERICA SERVIÇOS LTDA. (ULA)

	MEN	WOMEN	TOTAL
Administration	2		2
Director		1	1
Sales	2	3	5
Total	4	4	8
%	50	50	

UBE MÉXICO S DE RL DE CV	MEN	WOMEN	TOTAL
Administration		1	1
Sales	1		1
Total	1	1	2
%	50	50	



5.4.2 Modalities of contracts

[2.7 / 2.8]

By **age range**, UCE shows a higher concentration of staff in the 41-50 age range, and Repol in the 31-40 age range.

UCE: AGE RANGE	N° OF EMPLOYEES	%
20-30	38	8
31-40	130	27
41-50	194	41
51-60	99	21
61-70	12	3
Total	473	100

REPOL: AGE RANGE	N° OF EMPLOYEES	%
20-30	10	14
31-40	29	40
41-50	17	23
51-60	11	15
61-70	6	8
Total	73	100

With regard to the **types of employment**, the high percentage of permanent contracts (99.6% at UCE, 100% at Repol) is noteworthy. At UBE Corporation Europe, by gender, of the total of 471 permanent contracts, 22% are women. In terms

of temporary contracts, out of 2 contracts, 100% are men. The following table includes the annual average of permanent, temporary and part-time contracts by gender, age and professional classification.

UCE TYPE OF CONTRACT

PROFESSIONAL GROUP	0	1	2	3	4	5	6	7	55	Total
Indefinite (type 100)	7	68	79	68	27	32	16	9	3	309
Men	7	56	61	55	17	23	13	7	3	242
Women		12	18	13	10	9	3	2		67
Indefinite (type 189)		55	40	13	37	11	2	3		161
Men		52	26	9	26	8	1	2		124
Women		3	14	4	11	3	1	1		37
Indefinite (139A)		1								1
Men		1								1
Temporary (421)			2							2
Men			2							2
Grand total	7	124	121	81	64	43	18	12	3	473

UCE	MEN	WOMEN	TOTAL
Indefinite	367	104	471
Temporary	2		2
			473

REPOL TYPE OF CONTRACT

PROFESSIONAL GROUP	1	2	3	4	5	6	7	8	Total
Indefinite (type 100)		1	7	16	4	3	7	1	39
Men		1	6	11	3	3	6	1	31
Women			1	5	1		1		8
Indefinite (type 189)			13	8	13				34
Men			13	5	8				26
Women				3	5				8
Grand total		1	20	24	17	3	7	1	73

REPOL	MEN	WOMEN	TOTAL
Indefinite	57	16	73
Temporary	0	0	0
	57	16	73

5.4.3 New recruitments and departures

[401.1]

During FY2024, 14 new recruitments took place in UCE, with 50% of them being women. Of the 32 departures, 44% were women. A total of 12 people were dismissed, all of them men. In Repol there were 7 new hires and 11 departures, of which 6 were dismissals. At UEG (Germany) there were 9 departures and 4 recruitments.

UCE	SPAIN	JAPAN	BELGIUM
Hires	14 (100%)		
Departures	30 (94%)	1 (3%)	1 (3%)

HIRES AND DEPARTURES BY AGE (UCE)

	20-30	31-40	41-50	51-60	61-70	TOTAL
Hires	11	1	1		1	14
Departures	11	5	6	1	9	32

HIRES AND DEPARTURES (REPOL)

	MEN	WOMEN	TOTAL	% WOMEN
Hires	4	3	7	43
Departures	7	4	11	36

HIRES AND DEPARTURES BY NATIONALITY (REPOL)

	SPAIN	TOTAL
Hires	7	7
Departures	11	11

HIRES AND DEPARTURES BY AGE (REPOL)

	20-30	31-40	41-50	51-60	61-65	TOTAL
Hires	2	3	2			7
Departures	2	2	1	2	4	11

HIRES AND DEPARTURES (UEG)

	MEN	WOMEN	TOTAL
Hires	3	1	4
Departures	4	5	9

HIRES AND DEPARTURES (UCE)

	Men	Women	Total	% Women
Hires	7	7	14	50
Departures	18	14	32	44

DISMISSAL BY SEX (UCE)

	AGE RANGE	LEVEL	N° OF PERSONS
Man	20-30	1	1
Man	41-50	2	1
Man	51-60	1	1
Man	61-65	0	3
Man	61-65	3	2
Man	61-65	1	1
Man	61-65	5	2
Man	61-65	1	1

DISMISSALS BY SEX (REPOL)

	AGE RANGE	LEVEL
Man	51-60	7
Man	31-40	1
Man	21-30	1
Man	61-65	2
Man	51-60	2
Woman	61-65	1



5.4.4 Remuneration and wage gap

[2.19 / 2.20 / 2.21 / 202.1 / 405.2]

In the analysis for the 2024 financial year, no significant or systematic pay gap requiring specific attention has been detected, in accordance with the criteria of Spanish legislation for equal treatment and opportunities between women and men in employment and occupation. In the UCE Group, all staff receive a salary above the minimum wage. Below is an analysis of the

annual average by occupational group and by age, for men and women.³⁶

According to the average annual remuneration by level, in UCE the biggest difference in remuneration between women and men is at level 5 with 8.9%, and this difference is not considered to be significant. The table by age and gender shows no significant positive pay gap in favour of men in any group. In none of the classifications is there a pay gap of more than 25%, the average difference in the company being 2.7%.

UCE. ANNUAL REMUNERATION BY LEVEL (€) GAP BETWEEN MEN AND WOMEN

Level	Men	Women	Gap	%
	Annual average	Annual average		
0	150,633	n/a	n/a	n/a
1	34,014	31,409	2,605	7.7%
2	39,366	38,227	1,139	2.9%
3	49,877	48,091	1,786	3.6%
4	43,712	46,658	-2,945	-6.7%
5	61,087	55,623	5,464	8.9%
6	78,123	79,446	-1,323	-1.7%
7	97,218	95,074	2,144	2.2%
55	64,941	n/a	n/a	n/a
Grand total	47,104	45,812	1,292	2.7%

UCE. AVERAGE ANNUAL REMUNERATION BY AGE RANGE (€) GAP BETWEEN MEN AND WOMEN

Age range	Men	Women	Gap	%
	Annual average	Annual average		
22-31	32,164	31,616	548	1.7%
32-41	37,193	40,977	-3,783	-10.2%
42-51	48,939	46,022	2,917	6.0%
52-61	64,104	71,968	-7,864	-12.3%
62-71	103,212	n/a	n/a	n/a
Grand total	47,104	45,812	1,292	2.7%



⁽³⁶⁾ The calculation is based on the basic salary, the assigned allowance and the length of service allowance, leaving out shift or night allowances, which are specific to the job, regardless of the person. The difference between the average remuneration of men and women by age group or range is calculated, divided by the average for men, and expressed as a percentage.



In the case of Repol, the highest average wage gap is in group 3, with a gap for women of 13.7%. The overall average gap is 4.9%. The comparison by age ranges shows a positive gap for men of 26.4% in the 53-62 age range, and a positive gap for women of 23.1%, between 43 and 52 years of age, which softens the differences of previous years.

These differences are due to the statistical effect of the change in the demographic structure of the company from its beginnings fifty years ago to the present, with the progressive incorporation of women in all groups of the classification.

REPOL. ANNUAL REMUNERATION BY LEVEL (€) GAP BETWEEN MEN AND WOMEN

Group	Men	Women	Gap	%
	Annual average	Annual average		
1	n/a	n/a	n/a	n/a
2	22,856	n/a	n/a	n/a
3	26,518	22,875	3,643	13.7%
4	30,568	28,068	2,500	8.2%
5	34,034	34,754	-720	-2.1%
6	45,286	n/a	n/a	n/a
7	59,549	67,814	-8,264	-13.9%
8	78,543	n/a	n/a	n/a
Grand total	34,419	32,735	1,684	4.9%

REPOL. AVERAGE ANNUAL REMUNERATION BY AGE RANGE (€) GAP BETWEEN MEN AND WOMEN

Age range	Men	Women	Gap	%
	Annual average	Annual average		
23-32	27,492	27,534	-43	-0.2%
33-42	31,711	32,409	-697	-2.2%
43-52	34,165	42,047	-7,882	-23.1%
53-62	44,473	32,748	11,725	26.4%
Grand total	34,419	32,735	1,684	4.9%



5.4.5 Employees with disabilities

According to Spanish regulations, UBE Corporation Europe is obliged to guarantee a two percent reserve quota for employees with disabilities. There is currently one male employee with a disability in the workforce, who is classified as level 1.

The company has an exemption certificate, renewed in 2022 by the Regional Ministry of Sustainable Economy, Productive Sectors, Trade and Labour, in accordance with Royal Decree 364/2005, due to the impossibility of the public employment services and placement agencies to meet the job offers presented by UCE, given the lack of job seekers with disabilities registered in the indicated occupation. The alternative measures applied in the case of UCE are as follows:

- ▶ Contract for the provision of business services in the Castellon offices with the *Quality Dual Integra* Special Employment Centre.
- ▶ Financial donations for the development of job placement and job creation activities in the area of Castellon, by the following public utility entities: Adecco Foundation, El CAU School

Association and El Rinconet Farm School Association.

Repol does not employ any disabled personnel and holds an exemption certificate for compliance with alternative measures (donation to the Adecco Foundation), as does UCE. UEG also complies with the applicable provisions of German federal law.

The Human Resources Department continues to actively explore other employment integration opportunities for people with disabilities at UCE. Since 2015, the company has been collaborating with the *Employment Networking* organised by the **Corporate Social Responsibility Board of Castellon** to facilitate connections between companies and unemployed individuals, promote the exchange of experiences and improve the employability of groups facing greater challenges in accessing the labour market. In addition to contributing to the training and preparation of *Networking* participants, UCE has conducted interviews and reviewed CVs of people with disabilities to continue assessing their potential incorporation into the company.



5.5 WORK ORGANISATION

5.5.1 Work organisation

Working days, working hours, overtime and holidays

The annual working time according to the sectoral agreement is 1,752 hours³⁷. The Personnel Rules Manual specifies the company's work organisation.

Normal working hours:

- ▶ **Split shift:** 8.00 a.m. to 5.20 p.m. Monday to Thursday, with a 40-minute lunch break daily, and 8.00 a.m. to 2.00 p.m. on Fridays.
- ▶ **Intensive working hours:** 8.00 a.m. to 2.00 p.m. from Monday to Friday in July and August and from 23 December to 6 January of the following year, as well as the days in June that are necessary to maintain the number of working hours in annual calculation, in accordance with the intensive working hours established in previous agreements.

Overtime. For employees who do not work shifts, weekly rest and rest on public holidays are respected in accordance with the general precepts established in the legislation. Employees working shifts that cover 24 hours a day (long shift), enjoy the breaks defined for each cycle of 35 days according to the agreement for the implementation of the fifth shift, and also enjoy a minimum of 10 additional rest days per year, which increases to a maximum of 21, depending on the age range of the person.

In general, the company's permanent staff are entitled to an annual paid holiday of 22 working days for employees with normal working hours and 23 working days for shift workers. Moreover, in both cases, the days of holiday are increased by 1 additional day for every five years of recog-

nised seniority up to a maximum of 6, on reaching 30 years of seniority in the company.

The fifth shift agreement implemented since 2015 improved conditions by minimising night work and overtime. It favours work-life balance by making weekly breaks coincide more frequently with weekends, ensuring two weekends off in each 35-day cycle. The company understands that organisationally it is more competitive and improves production quality. The agreement applies to jobs that are to be covered 24 hours a day, every day of the year under a shift work organisation. Working time is regulated in three shifts, from 06:00 to 14:00 (morning shift); from 14:00 to 22:00 (afternoon shift) and from 22:00 to 06:00 (night shift).



UCE. PLANNED HOURS FOR THE DIFFERENT WORKING DAYS MODES

Type of shift	Hours
Shift A	68,800
Shift B	67,200
Shift C	68,800
Shift D	67,200
Shift E	67,200
Shift runner	22,400
Short shift	4,800
Split day*	80,632
Shift day*	345,447
Total hours	792,479

(* depending on seniority in the company)

⁽³⁷⁾ https://www.boe.es/diario_boe/txt.php?id=BOE-A-2018-11368

Shift cycle. Each shift of workers switches between work and rest periods in a 35-day cycle of irregular distribution starting on a Monday:

3 days on the morning shift, 4 days on the night shift, 3 days off; 4 days on the morning shift, 3 days on the afternoon shift, 7 days off; 4 days on the afternoon shift, 3 days on the night shift, 4 days off. This 35-day cycle is carried out by each of the five shifts with a one-week lag with respect to one of the other five shifts. Thus, each 35-day cycle has 21 working days and 14 rest days. The weekly rest established in the cycle accumulates

an annual excess of 14 rest days, and therefore a mechanism is established for returning rest days by systematically cutting the first two or the last two rest days of the central group of seven rest days of each two cycles, alternately.

Repol's shift system is Monday to Friday, continuous shift, mornings (6:00 to 14:00), evenings (22:00 to 6:00) and afternoons (14:00 to 22:00) for production staff, and split shifts from 8:00 to 17:00, with 45 minutes for lunch. No work is carried out at weekends.

5.5.2 Absenteeism rate

HOURS OF TEMPORARY INCAPACITY AND CHILDCARE LEAVE / TOTAL HOURS WORKED (%)

	2023	2024
Average UBE Corporation Europe	4.62%	3.39%
Average UEG	2.85%	3.03%
Average Repol	8.69%	2.30%



5.5.3 Work-life balance

[401.3]

In order to allow a balance between work and personal development, UCE uses this formula to adapt the start and end times, maintaining the working day and always attending to the needs of the company. Its application depends on the characteristics of each area and of the specific job and is analysed on a case-by-case basis.

At UCE, Repol and UEG, teleworking is regulated in accordance with the functions and possibilities of each position, and there is a clocking-in

system that ensures sufficient rest time between working days. The possibility of working one day a week without having to be present at the workplace, in accordance with Spanish regulations, contributes to flexibility and work-life balance.

In the area of **digital disconnection**, the UCE Group applies recommendations and best practices, including limiting meetings to working hours, avoiding sending e-mails outside working hours or on weekends, proper management of meetings, especially with participants of different nationalities and cultures, etc.

TYPE OF LICENSE FOR CONCILIATION (2024)	UCE + REPOL			UEG		
	Total	Men	Women	Total	Men	Women
Nº. of maternities / paternities	44	41	3			
Nº of pregnancy and breastfeeding risks	1	0	1			
Leaves of absence	2	1	1			
Reduction of working hours	13	1	12	3	0	3
Flexible working hours cases	62	36	26			
Breastfeeding leaves	21	20	1			

CONCILIATION PERMITS AND LICENSES

%

Percentage of return to work	No. of employees who returned / had to return to work after parental leave	100/100
Percentage of continuity in work	No. of employees who continue to work 12 months after parental leave	100
	No. of employees returning from parental leave	100



The Family Plan: between work-life balance and social benefits

This is a social programme of the Adecco Foundation that offers disabled family members of UBE employees the opportunity to develop skills, attitudes and social, personal and professional competences, with the aim of enhancing their social and occupational integration. In 2024, **ten people with disabilities**, relatives of UCE staff, have received specialised support, contributing to improvements in their quality of life, autonomy and social inclusion.

5.6 TRAINING

[404.1 / 404.2 / 404.3]

The annual training plan targets all staff, aiming to enhance the organisation's potential, foster professional development, improve competitiveness and support change. Training activities are evaluated by both the employee and the supervisor and focus on six main areas:

- ▶ **Technical Expertise Training:** specific to the job position, defined by the supervision of each area and managed as required by the role.
- ▶ **General Expertise Training:** Cross-functional (computer programmes, new work procedures, languages, etc.) Defined by the Human Resources Area in collaboration with the other areas.
- ▶ **Corporate training:** Mandatory to support the organization's overall objectives and defined by management. It may include topics such as ethics and compliance, quality, new corporate procedures, etc.
- ▶ **Safety, prevention and environmental training.** Mandatory and established by the functional department for occupational risk prevention, safety and environment.



- ▶ **Competence training.** Defined by the Human Resources Area as a complement to strengthen the skills needed for career development, facilitate the transition to new positions or support succession plans.
- ▶ **Work-related seminars, conferences and forums**

UBE CORPORATION EUROPE. TRAINING BY KNOWLEDGE AND SEX. 2024.

	Professional skills	Corporate	General expertise	Technical expertise	Seminars, conferences and forums	Safety, risk prevention and environment	Grand total
Men ¹	567.0	1,170.0	648.0	327.0	340.5	5,531.5	8,584.0
Average men ²	1.54	3.17	1.76	0.89	0.92	14.9	23.26
Women ¹	427.0	413.0	192.0	651.0	182.5	535.0	2,400.5
Average women ²	4.11	3.97	1.85	6.26	1.75	5.14	23.08
Grand total ¹	994.0	1,583.0	840.0	978.0	523.0	6,066.5	10,984.5
Average total ³	2.10	3.35	1.78	2.07	1.11	12.83	23.22

(1) Total hours (2) Average total training hours (3) Average total training hours per person

UBE CORPORATION EUROPE. TRAINING BY PROFESSIONAL GROUP AND SEX. 2024.

Total hours/year	Directors	Levels 1-3	Levels 4-6	Grand total
Men	382.0	6,459.5	1,742.5	8,584.0
Women	49.5	893.0	1,458.0	2,400.5
Grand total	431.5	7,352.5	3,200.5	10,984.5
Average hours of training per person	20.6	22.6	25.4	23.2

REPOL. TRAINING BY KNOWLEDGE AND SEX. 2024.

	Professional skills	Corporate	General expertise	Technical expertise	Seminars, conferences and forums	Safety, risk, prevention and environment	Grand total
Men ¹	-	83.0	5.0	12.0	8.0	374.0	482.0
Average men ²	-	1.5	0.1	0.2	0.1	6.6	8.5
Women ¹	51.0	28.0	35.0	16.0	15.0	2.0	147.0
Average women ²	3.2	1.8	2.2	1.0	0.9	0.1	9.2
Grand total ¹	51.0	111.0	40.0	28.0	23.0	376.0	629.0
Average total ³	0.7	1.5	0.6	0.4	0.3	5.2	8.6

(1) Total hours

(2) Average total training hours

(3) Average total training hours per person

The most important training activities during the year included the following:

SAIKO Project

The SAIKO Project aimed to optimise UBE Corporation Europe as a healthy organisation. Its purpose was to promote health and psychological well-being within the company, highlighting positive aspects and improving negative ones.

Methodology

- ▶ Diagnosis and well-being assessment: questionnaires, interviews and focus groups.
- ▶ Design and implementation of Positive Psychological Interventions (PPI).
- ▶ Evaluation and diagnosis after interventions.

Proposed interventions, following the IGLO Multi-level Model (Individual, Group, Leader and Organisational): several initiatives were designed to improve the well-being and performance of UBE staff:

- ▶ Positive Leadership. 23 people trained in two groups, each with three sessions of 2 hours.
- ▶ Healthy Team Development: 17 people trained in two groups, each with 3 sessions of 2 hours.
- ▶ Healthy Emotionality. 47 people trained in two groups, each with 4 sessions of 2 hours.

The expected results of the SAIKO Project are:

1. Enhanced psychological well-being: Increased mental and emotional competence, self-efficacy, resilience, optimism, engagement,

gratitude, hope, compassion, and trust among employees.

2. Reduced psychological distress: Decrease in burnout and other work-related stress factors.
3. Development of healthy organisational practices: Implementation of specific action plans to foster a positive and healthy work environment.
4. Optimised leadership: Adoption of more positive and healthy leadership styles that support employees' personal and professional development.
5. Improved social interaction: Promotion of positive social interactions among work teams to enhance coordination and organisational well-being.
6. Culture of respectful treatment: Establishment of a culture of positive social interaction that promotes well-being and excellence in organisational performance.

Talks on Gender Violence and Workplace Harassment.

Organised by the Equality Committee and delivered by Jordi Abenaza, National Police Inspector at the Provincial Headquarters of Castellon, these sessions addressed crucial issues for our work and social environment, focusing on gender violence and workplace harassment from a police perspective.

- ▶ **Date:** 4 June (2 sessions: 12:00 - 13:00 / 14:30 - 15:30)
- ▶ **Contents:** gender-based violence and workplace harassment
- ▶ **Objectives:** to raise awareness and train staff

on gender-based violence and workplace harassment, providing tools and knowledge to identify and address these issues appropriately in the work environment.

▶ **Results:** 49 people received training on these topics, enhancing their ability to recognise and manage situations involving violence and harassment in the workplace.

Safety training.

The Safety, Health and Environment area has carried out various activities and training to improve safety and well-being in the workplace. The main actions carried out are detailed below:



- ▶ New work permit system
 - ▷ Training and Internships:
 - ▷ FS009 - Self Contained Breathing Apparatus (SCBA)
 - ▷ QUADRANT Training
 - ▷ Fire-fighting practices
 - ▷ FS008 - Use of Fire Fighting Equipment (Shift, Brigade and Standby)
 - ▷ FS001 - Use and operation of forklift trucks and pallet trucks
 - ▷ FS005 - Risks in work at heights and rescue in confined spaces
 - ▷ FS011 - Load Lifting Operations
 - ▷ FS008 - Use of Fire Fighting Equipment (Brigades)

- ▷ Preventive Security Observations (PSOs)
- ▷ FS010 - ISPS
- ▷ Ammonia leakage work and intervention course
- ▷ Advanced Course on Fire Fighting Procedures (Seganosa)
- ▷ Basic PRL 50h
- ▷ CBP_Process Security
- ▷ FS013 - Use and operation of overhead crane
- ▷ FS002 - Loader Use and Operation
- ▶ Work permits
- ▶ Emergency Planning, Organisation, Management and Coordination
- ▶ Specific training:
 - ▷ CMR (Carcinogens, Mutagens and Reprotoxicants)
 - ▷ CBP_Work Permits
 - ▷ CBP_ISO 45001 / PAU
 - ▷ FS015 - LOTO (Virtual Reality)
 - ▷ ADR Safety Advisor Renewal Course
 - ▷ Master in PRL
 - ▷ FS010 -ISPS Port Facility Security Officer Course

Ethics and compliance training: by the end of financial year 2024, 88.4% of the workforce has completed the Ethics and Compliance course on our online platform.



Attitudinal development process

This tool supports the professional development of staff. Each year, nine personal competencies are assessed for every individual (identification with the company; motivation; achievement orientation; acceptance of change; creativity; business orientation; teamwork; management and regulatory and operational discipline), resulting in a final score that helps identify areas for improvement during their individual performance review interview. (This system will be integrated

into Repol in the coming years). The process consists of the following phases:

- ▶ Self-assessment: allows to know oneself better and to discover blind areas in development (those competences where there are major differences).
- ▶ Evaluation by supervision.
- ▶ Evaluation by the internal client.
- ▶ Employee evaluation: this will facilitate the improvement process as a manager.

**UCE. PERFORMANCE EVALUATION BY GROUP AND SEX. 2024
(100% OF EMPLOYEES)**

Professional group	0	1	2	3	4	5	6	7	55	Total
Men	7	109	89	64	43	31	14	9	3	369
Women		15	32	17	21	12	4	3		104
Total	7	124	121	81	64	43	18	12	3	473
% Women	-	12	26	21	33	28	22	25	-	22



5.7 UNIVERSAL ACCESSIBILITY FOR PERSONS WITH DISABILITIES

UBE Corporation Europe's facilities present an intrinsic complexity, similar to other chemical manufacturing plants, due to the design and layout of the production units, which involve physical risks, that are catalogued and assessed for each workstation. In addition, personnel access to production and chemical storage areas

requires special preventive measures depending on the case (personal protective equipment, prior atmospheric analysis, etc.) which must be strictly observed for safety reasons. Consequently, access for people with reduced mobility is limited to the R&D Centre, where general management, administration, human resources, and logistics areas are located, along with the R&D departments. This building is situated in the part of the company's premises furthest from the production units and is equipped with an access ramp, lift, parking, and accessible restroom, where individuals with reduced mobility are received. Repol also provides an accessible entrance to its office building.



5.8 EQUALITY

5.8.1 Equality between men and women

UCE is guided, among other principles, by the value of equity, which ensures fair working conditions, based on non-discrimination and equal opportunities, while recognising and promoting the contribution of its professionals in all circumstances, and upholding equal treatment throughout the organisation.



UBE Corporation Europe's 2nd Equality Plan came into effect on 6 May 2021 and will remain valid until May 2025. In accordance with Royal Decree-Law 6/2019, **Repol** prepared and registered its plan, which is valid from March 2022 to March 2026. Each of these two companies has its own Equality Committee, while the other foreign subsidiaries are not subject to this requirement. The Equality Plans of UCE and Repol include an equality diagnosis in the area of remuneration, covering the analysis of jobs, training, working conditions, selection, and promotion, in accordance with applicable regulations. This remuneration audit was in force for

the 2024 financial year. UCE's Equality Committee held meetings on 24 April and 24 October 2024, while Repol monitors its Equality Plan through a two-person committee, using online meetings and written communications for the adaptation and validation of protocols and other measures.

Highlights in 2024

- ▶ 100% of the offers published during the selection processes were reviewed to ensure the use of non-sexist language, in accordance with the measures of the Equality Plan at UCE.
- ▶ The Marketing function coordinates the participation of UCE staff in initiatives to promote STEM (Science, Technology, Engineering and Mathematics) careers, such as the one held in October at the UJI science park³⁸.
- ▶ The study of the first measures of Repol's 1st Equality Plan (professional development, access to training) has started, and the updating of job positions at UCE to eliminate possible sexist definitions is still in progress.

Other measures planned at UCE for the coming years under the 2nd Equality Plan are as follows:

- ▶ Identification of barriers faced by women in accessing promotion processes and definition of strategies to overcome them.
- ▶ Development of Career Plans to address the under-representation of women in identified positions.
- ▶ Maintenance and analysis of professional development records, as well as the salary audit in accordance with RD 902/2020 (annual activity).
- ▶ Identification and implementation of specific preventive measures for women in roles where required.

⁽³⁸⁾ <https://mapatecnologico.uji.es/femstem/>

- ▶ Implementation of an EFR (Family Responsible Company) system. Training and information on sexual and/or gender-based harassment prevention measures.
- ▶ Encouraging recruitment in under-represented positions (annual activity)

For its part, Repol's 1st Equality Plan will develop the following measures in the coming years:

- ▶ Create a register and conduct a career development survey
- ▶ Create a non-discriminatory professional development protocol governed by the principle of gender equality.
- ▶ Creation of a protocol for access to training based on the concept of gender equality.
- ▶ Development and implementation of women's health programmes
- ▶ Creation of a protocol for the management of sensitive persons
- ▶ Review and modification, if necessary, of the possible sexist image of the company.
- ▶ Updating the communication procedure by integrating a code of good practice in relation to sexist communication.
- ▶ Conduct an annual pay survey to measure the level of equality.
- ▶ Creation of a pay protocol based on the equality concept
- ▶ Modification of the internal communication plan to avoid the invisibilisation of women and their under-representation.

5.8.2 Discrimination

[406.1]

The company favours equal development and opportunities for all people and does not accept any type of personal discrimination for any reason, as reflected in the Code of Ethics and Conduct, the Staff Standards Manual, the list of Prohibited Conduct of the Compliance System and the Protocol for action in situations of harassment based on sex and/or gender, sexual orientation and identity. Possible infringements can be reported through the EC Line hotline. In financial year 2024, there were no complaints in this regard.

A blurred office scene with people working at desks. A glass partition in the foreground has the 'LUBE' logo in blue, italicized, bold letters. The background shows a woman in a green top and a man in a grey suit with a yellow scarf. There are computer monitors, a potted plant with pink flowers, and a desk lamp.

LUBE

6. HUMAN RIGHTS

6.1 EVALUATION OF HUMAN RIGHTS

[2.22 / 2.23 / 2.24 / 2.25 / 2.27 / 3.3 / 410.1]

In the area of human rights, the **material issues** identified relate to Good Corporate Governance and Regulatory Compliance; Promoting Local Socio-Economic Development; Corporate Alignment with the SDGs; Human Rights Impact Assessment and Supplier Policy / Responsible Supply Chain Management. The potential negative impacts would stem from regulatory non-compliance or issues arising if the supply chain fails to adequately integrate principles of governance, environmental sustainability, human rights protection, or occupational safety.

Strengthening mutually beneficial relationships with stakeholders and supporting the procurement and design of safe, sustainable, and energy-efficient products and services are key commitments of the **Management Policy**. Likewise, the **Environmental Sustainability Policy** promotes fostering sustainability throughout the value chain with suppliers, customers, and other stakeholders through communication, dialogue, and collaborative efforts.

The occupational risk prevention and industrial safety measures constitute a first basis for human rights protection and the other practices and indicators described in chapter 5 are in line with the *Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the International Labour Organisation* (ILO) in the different aspects of employment promotion, equal opportunities and treatment, job security, training, working and living conditions (minimum working age; health and safety) and labour relations (freedom of association; bargaining and consultation). In relation to environmental and social responsibility compliance in the supply chain, the company applies a

robust control system through assessments, audits and contractual measures, with other additional management measures under consideration.

The company has a **crime prevention model**, inspired by the principles of good governance, proportionality, transparency and sustainability, and based on the main applicable standards and regulations. This model incorporates various instruments to ensure **integrity and compliance in the field of Human Rights**, such as the Code of Ethics and Conduct; the Catalogue of Prohibited Conduct; the EC Line reporting channel.

The Code of Ethics and Conduct³⁹ establishes **respect for human rights**, as well as the **principle of non-discrimination** against people based on their nationality, ethnic origin, race, gender, sex, sexual orientation, religion, ideology, culture, political opinion, social status, marital status, pregnancy, parental status, age, mental or physical disabilities, membership of a trade union or any other personal, physical or social condition. It also safeguards this principle, both in selection processes and internal promotion and in the day-to-day running of the business. Furthermore, in accordance with the code, **UBE does not directly or indirectly accept child labour or work in precarious, forced or inhumane conditions**, and is committed to creating safe, healthy and motivating workplaces in all production, supply and support activities, both for products and services, in all geographical areas where it is present.

Transparency and dialogue preside over labor relations, and as discussed in 2.2, 5.1 and 5.2.1 above, there are several committees to handle matters related to collective bargaining, working conditions, safety, improvements in work operations, equality issues etc. In addition, the supervisory line or Human Resources staff can channel queries and suggestions, including those relating to human rights if any.

⁽³⁹⁾ https://ube.es/wp-content/uploads/2022/07/2022-Codigo-Etico-y-de-Conducta-Grupo-UCE_es.pdf

Finally, within the **Ethics and Compliance System**, there is the so-called **EC Line**, which is the Internal Information System (SII) or confidential reporting channel for queries or hypothetical breaches, as well as a collegiate body, the **SII Manager**, an **Ethics and Corporate Responsibility Committee**, and a **Compliance body** to provide support to the company and resolve the queries received, as detailed in Chapter 7. The members of these internal bodies have the experience and training required for these functions. **In financial year 2024, no complaints or warnings were received for non-compliance with human rights commitments.**

In relation to companies supplying goods and services, UBE requires their adherence to business codes of conduct or other tools covering ethical, social and environmental aspects similar to its own, through the supplier evaluation system and general contracting conditions. Regarding the need for **security personnel trained in human rights policies or procedures**, UBE's facilities are part of an industrial zone, classified as critical infrastructure by the National Centre for Infra-

structure Protection and Cybersecurity (CNPIC). The external security service is shared with the company BP Energía España S.A.U. and is contracted with an external security company, which is a member of the Spanish Network of the United Nations Global Compact and expresses its commitment to the 10 Principles of the Global Compact in the areas of Human Rights, Labour Standards, Environment and Anti-Corruption through a certificate of adherence, as well as its own Human Rights Policy.⁴⁰

As a company, **UCE does not directly invest in financial assets**, although it does act as promoter of the pension plan FONDOUBE Pensiones, F.P. The fund's supervisory committee has established the inclusion of **ESG** (Environmental, Social and Governance) **criteria** in the management of investments, urging the management company to apply them in its investments, based on the principles of sustainable investment and transparency. To this end, the management company takes the PRI criteria (Principles for Responsible Investment promoted by the United Nations) as its main reference.



⁽⁴⁰⁾ https://www.prosegur.com/dam/jcr:ceffdd58-b77d-432fb986-0641d7dd3340/PCS-Politica%20de%20Derechos%20Humanos%20PCS_v1.pdf



7. ETHICS AND COMPLIANCE

[2.15 / 2.22 / 2.23 / 2.24 / 2.25 / 2.26 / 2.27 / 3.3 / 205.1 / 406.1]

With regard to "Good corporate governance and regulatory compliance", which is one of the most important **material issues** related to Governance, the hypothetical negative **impacts** that could occur would be mainly related to regulatory and legal breaches in the area of the company's criminal liability, carried out maliciously and with very serious effects on aspects relating to the market and competition, the Treasury and Social Security, intellectual property, public health, the environment, employment, etc.

In the case of the UCE Group, the commitments and values established in the **Management Policy**, the **Code of Ethics and Conduct** and the **Compliance Policy** advocate compliance with laws, rules, regulations and agreements with third parties, the promotion of fair and open competition, respect for industrial and intellectual property and company assets, information transparency and responsibility and integrity in the development of activities.

UCE has a robust **governance structure**, and additionally has complementary tools to ensure ethics and compliance, as described in this chapter: **Internal Information System Policy**, **Crime Prevention Manual**, **Anti-Corruption Policy**, **Catalogue of Prohibited Conduct**, etc. The prevention model is supported by a control environment, criminal risk management, control and supervi-

Highlights in 2024

- ▶ Recorded the declaration of gifts received by 32 people in the company and reported the delivery of gifts to 25 client companies.
- ▶ A methodology for monitoring and verifying the controls of the Crime Prevention Models has been implemented, updating and improving its application.
- ▶ A new corporate standard on Security Trade Control has been incorporated into the management system.
- ▶ During FY2024, 88% of the workforce completed the new Ethics and Compliance course on our online platform and personalised and dynamic trainings were conducted, for example with the Executive or in relation to the functioning of the Internal Reporting System.

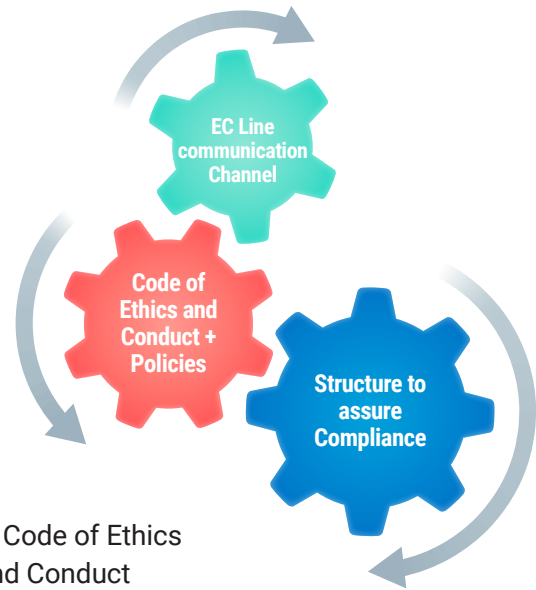
sion activities, financial, human and technological resources, communication and training measures, a warning channel, a disciplinary system and regular verification and updating. All these elements ensure compliance and facilitate supervision while minimising criminal risks.



Control mechanisms

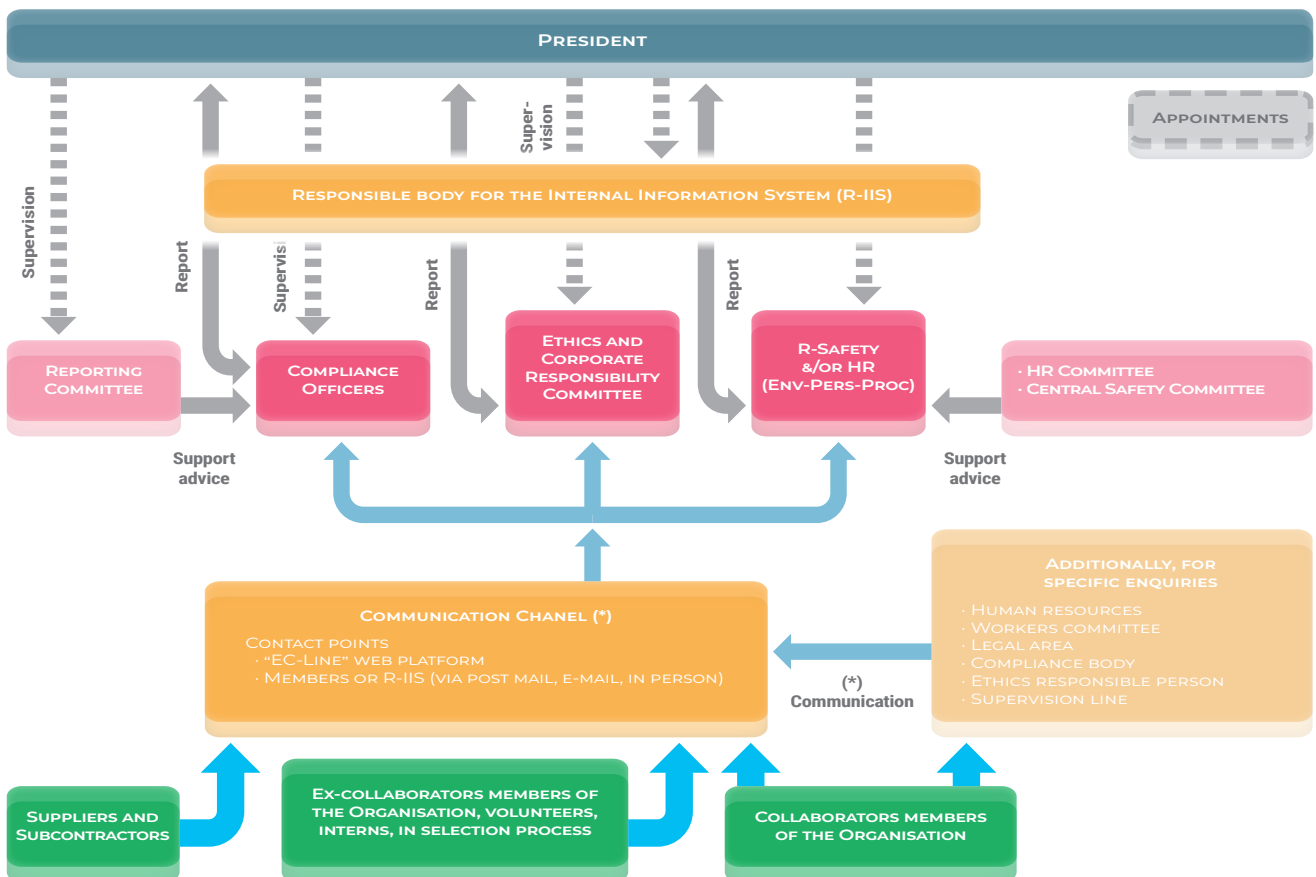
The generation of trust is considered the company's most important asset and its maintenance and development has led to progress in honest and responsible corporate behaviour. The structure of the group's management body is legally configured as a sole director, a position held by UBE Corporation. For decision-making and implementation, the company operated in the 2024 financial year with an executive presidency, an executive committee, the heads of the subsidiaries, and the staff units and functional areas.

The UCE Group is committed to compliance in the execution of its corporate and business activities, in accordance with legislation, regulations and social rules in all its areas of operation. This **Compliance Policy** is based on three fundamental pillars:



- a. Code of Ethics and Conduct
- b. Structure to ensure the establishment and practice of Compliance
- c. "EC Line" communication channel

Compliance structure.



(*) Mandatory for actions or omissions within the scope of Law 2/2023 (Art. 2), regulating the protection of persons who report regulatory violations and the fight against corruption.

The EC Line channel is available to UCE Group employees, including materials and service suppliers, for matters related to their business relations with the Group. It allows the reporting of complaints concerning risk or non-compliance with internal regulations or current legislation, facilitating the identification and appropriate resolution of compliance incidents. The system also enables the submission of queries aimed at resolving doubts about the interpretation of the Code of Ethics and Conduct, other internal regulations or applicable legislation. The channel is intended for communications on matters related to Compliance, Ethics and Corporate Social Responsibility. This confidential and preferential web tool, provided by the UCE Group as part of the Internal Information System, is designed for reporting regulatory breaches and combating corruption, in accordance with Law 2/2023, which governs the protection of individuals who report potential breaches of European Union law and other serious or very serious criminal or administrative violations.



There are also other **tools of the integrated management system** that contribute to governance and compliance assurance: organisation and responsibilities; list of Authorizations, purchases and contracts, disposition of funds, information security, legal Authorizations granted by the company, safety management or environmental management procedures, etc.

The integrated audit management procedure establishes the internal audit process to assess the strengths and weaknesses of the Integrated Management System. Its scope covers all corporate processes and refers to both first party (internal), second party (customers and suppliers) and third party (certification) audits. Finally, the Management System Review procedure ensures compliance and continuous improvement of the system.

During the financial year 2024, an alert was received regarding conduct in interpersonal relations. The Ethics and Corporate Responsibility Committee's investigation confirmed that no legal violations had occurred and the case was closed. *Compliance Officers* handled 22 alerts, relating to compliance queries on gifts, trade compliance, intellectual property, competition, change management situations, conflicts of interest, sanctions and supply chain due diligence. And one alert was received which, after being assessed by the collegiate body responsible for the Internal Information System, was redirected to the appropriate persons responsible for handling it, as it was found that no legal infringement had occurred and that it fell within the scope of Human Resources. All queries were resolved within the year and in no case did they involve serious legal or ethical breaches or harm to third parties.

FY2024	CASES PENDING AT START OF FY	Nº. OF CASES RECEIVED	CASES SOLVED	HIGHER SEVERITY	LOWER SEVERITY AND CONSULTATIONS	TOTAL
Ethics	0	1	1	0	1	1
Compliance	1	21	22	0	22	22
Total	1	22	23	0	23	23

No cases of discrimination as defined by the International Labour Organisation (ILO) have been confirmed, nor have any other such situations been identified. No risk of conflict of interest has materialised and any potential conflict of interest situation has been resolved through prior consultation.

There were no express breaches of social or economic legislation in the fiscal year 2024 in the areas of trade and taxation.

No breaches of environmental legislation and regulations have been recorded, with UCE and Repol complying with all applicable requirements according to their respective integrated environmental authorizations and activity licences in force.



7.1 CORRUPTION AND BRIBERY

[2.27 / 3.3 / 205.2 / 205.3]

The Code of Ethics and Conduct of UBE Corporation Europe includes in point 5.4 the obligation of the company and its staff to comply with applicable laws and regulations, always observing transparency in transactions and opposing antisocial requests from groups, individuals or organised crime, which may seek financial gain through "violence, fraud or coercion". It is also forbidden to ask for, accept, offer or give any kind of bribe, blackmail or other illegal or unethical benefit to employees representing the company or third parties, directly or indirectly. The Group has no business dealings with private individuals or public administrations, thus reducing the scope of risk control of business transactions.

The **protection mechanisms** in this respect include the Ethics and Compliance System and the Crime Prevention Model, with its corresponding elements, including its manual, which is integrated into UCE's governance system in order to provide the company with an organisational and control model that includes the appropriate surveillance and control measures to prevent the commission of crimes within the company, including those related to corruption or bribery.

The **Compliance body** provides advice to management personnel and has an **external legal advisory service** specialising in compliance. No non-compliance has been detected during the year due to cases of corruption, conflict of interest, inadequate relationship with administrations, etc.

UCE adequately fulfils its **customs obligations** and has passed inspections by the Tax and Customs Control Unit of the Tax Agency in recent years without incident. With regard to illicit trade, the prevention measures in place prevent possible malpractices, such as the entry and exit of goods without paying the corresponding customs duties, clearance of goods without documentation etc.

With regard to the **risks arising from illicit trafficking** of prohibited or fraudulently imported or exported **goods**, especially in the case of dual-use goods, UCE applies the corporate standard of **Security Trade Control** and uses digital tools to verify natural and legal persons subject to sanctions. During the 2024 financial year, **81 investigations were conducted on customers and suppliers**. After completing the established controls, all transactions were processed without any incidents, other than the completion of the necessary documentary procedures.

Although UCE is not subject to the Spanish regulatory framework for the prevention of money laundering and terrorist financing, it applies due diligence measures considered reasonable, through procedures known as KYC/AML (*Know Your Customer and Anti-Money Laundering*), via an external information service.

Staff identified as being at risk of exposure to fraud, bribery, or corruption receive collective training and guidance, as well as ad-hoc training

when queries arise, covering the prevention of money laundering, illicit trade, and terrorist financing. Members of the management committee and the commercial teams of the subsidiaries receive collective and ad-hoc training, when needed, on compliance, antitrust, corruption, and bribery issues. During 2024, all UCE Group personnel were reminded of the policies on harassment, gifts and anti-corruption, as well as about the structure of the Ethics and Compliance system. Specific training on the most significant elements of the Compliance System and its tools was also provided to management personnel and reinforced during internal audits conducted by Compliance Officers with UCE Group managers. Since FY2024, newly hired personnel receive new online training on the Ethics and Compliance system and confirm their commitment to the UCE Group's Code of Ethics and Conduct, as well as to the other elements of the Compliance System.



7.2 MONEY LAUNDERING

The UCE Group does not directly make financial investments in securities, stocks or participations that could be considered as financial assets. On the other hand, it applies preventive measures for operations that could be considered money laundering or that go against the limitations on export operations of dual-use technology or weapons (items that do not appear in the product portfolio).

The main preventive measures against money laundering are:

- ▶ The company does not make any cash payments or collections.
- ▶ All collections and payments are made by bank transfer, which ensures traceability within the banking system, excluding entities domiciled in tax havens.

- ▶ Customers and suppliers go through a double filter for registration before UCE can operate with them (business units/finance area and supply chain/finance area, respectively).
- ▶ Collections and payments involve a series of operations and processes documented by the internal administration system, which cannot be carried out without the registration and authorization of the corresponding complete documentation (purchase order/customer order; entry/exit of materials from the warehouse; receipt/issuance of invoice).
- ▶ A customer risk assessment is regularly carried out using specialised commercial tools (economic, regulatory, geographic risk, etc.)

No files were reported during the year to the Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences (SEPBLAC) nor were any complaints submitted to other bodies regarding illicit trading, money laundering or the financing of terrorism.





8. SOCIETY

8.1 COMMITMENTS TO SUSTAINABLE DEVELOPMENT AND SOCIETY

[2.25 / 2.26 / 3.3 / 413.1]

The **Sustainable Development Goals** (SDGs) were adopted in 2015 by the Member States of the United Nations as part of the 2030 Agenda, with the aim of achieving shared prosperity in a sustainable world. For UBE, material issues related to the SDGs include economic growth and performance, growth in markets and customers, and responsible and efficient use of assets. Potential negative impacts relate to failure in innovation and R&D strategy, falling sales due to not meeting customer demands in time or cost, and the availability or cost of raw materials and energy.

Global sustainable development requires that the economic growth of actors is sustainable. In the chemicals and materials sector, this will depend to a large extent on the ability to deliver high value-added products with a low carbon footprint, that are useful for business and meet human needs without compromising the future.

As mentioned in other chapters of this report, the company has taken various actions to develop the circular economy through studies and certifications, innovation projects and collaborations with business partners within and outside its value chain. Other complementary actions include protecting intellectual property, optimising margins, prices and inventories to enable fair and sufficient returns, legally formulating commitments and contracts to protect intangible assets, ensuring the integrity of manufacturing assets through comprehensive maintenance or equipment renewal, as well as training human resources in the environment. Engagement with other companies, institutions, and organisations within the social fabric shapes and supports UBE on its path toward sustainable growth.

The UCE Group actively promotes **responsible citizenship** and, in line with its Code of Ethics, is

committed to addressing social and environmental concerns, responding to stakeholder expectations, and contributing to the development of the region in which it operates.

The range of products and services offered has the potential to deliver benefits to society. Equally important is socially and ethically responsible behaviour, through which UCE demonstrates concern for the people involved in the manufacture and support of its products and services, while improving productivity and minimising environmental impact on the community.

Although UCE is a **global company** and part of a Japanese industrial group with a significant multinational presence, the **socio-economic and environmental impact of its activities** is primarily concentrated in the immediate surroundings of its headquarters and production plant in Castellon (Spain): the city of Castellon and its province, the neighbouring town of Almassora, and the wider Valencian Community region.

This is due to the very nature of the environmental impact (emissions, effluents, and solid waste); the visual impact of the industrial facilities; the impact related to the safety of processes, products, and raw materials; the economic boost to the region through workforce selection and the purchasing and contracting of all types of services (supplies, consultancy, prevention, maintenance, construction, research and development, engineering, etc.); and the positive effect of its social action on the community.

UCE regularly collaborates with various groups representing civil society by developing activities with the educational community, the media, universities, and citizens' and business associations. The company also encourages its entire workforce to participate in individual civic and volunteer activities.

It maintains a permanent dialogue with the local, provincial and regional administrations in order to inform them in a transparent manner about the evolution of employment and business results, new investment projects, technical improvements

and environmental impact, as well as to listen and respond to possible concerns of the public or the legitimate interests of society, which the institutions may channel. The company's initiatives in this regard seek to improve communication with stakeholders, offering answers to the questions they may raise in the pursuit of their legitimate interests.

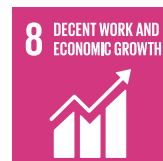
Future Challenges

The challenges ahead to fulfil commitments to the territory and society are as follows:

- ▶ Maintaining a close relationship with the local educational community to foster interest in scientific careers, promote technical training, and strengthen English language skills.
- ▶ Continuing to contribute, together with renowned charitable organisations and local institutions, to alleviating situations of exclusion or vulnerability among the most disadvantaged sectors of society in the Castellon area.
- ▶ Developing cultural, social, and economic exchanges between Yamaguchi and Ube City (Japan) and Castellon and its province, with a particular focus on the university sector.
- ▶ Promoting volunteer activities.

8.1.1 Employment and local development

The group is an active generator of direct and indirect employment in the community, as stated in chapter five of this report, contributing to local development and promoting the labour insertion of different professional profiles in the province. **34 students have carried out their internships in the company during 2024.**



Several groups of school and university visits were received during the year, with more than 140 students and teachers. The Human Resources department actively participated in the **job fairs** of the Universitat Jaume I in Castellon and Valencia and in the **Smartweek**, organised by the Castellon Chamber of Commerce.



8.1.2 Local populations and territory

[203.1/ 203.2]

Investments in infrastructure and services supported, in society.

Collaboration with the Vicent Castell i Domenech Institute (Castellon)

In 2018, the **Department of Education** of the **Generalitat Valenciana**, together with the **Vicent Castell i Domenech Institute of Castellon** and the Association of Industries of El Serrallo, Indes, launched the first higher level training cycle (CFGS) in industrial chemistry in the province, offering 18 places. UCE collaborated in the design of the curriculum and the training of civil servant teachers and has continued to actively collaborate with this programme that trains young professionals for jobs as chemical plant operators and the like. In 2018, it donated a continuous distillation unit worth over €16,000 and during the 2024-2025 academic year, **UCE staff taught 25 hours of classes** to first and second year Industrial Chemistry students. In addition, throughout their training, several of the students carry out their internships at both UCE and Repol, and in recent years a total of 15 graduates have joined their staffs.

Significant indirect economic impacts

The application of UCE's safety policy and prevention measures contributes on a daily basis to the development of a **high-level industrial safety culture** among regular contractors and their staff, although this impact is difficult to quantify. The company carefully monitors the accident rate indicators for contractor personnel.



8.1.3 Local communities

[413.1/ 415.1]

In the development of its communication policy with the community, UBE Corporation Europe maintains an active relationship of communication, exchange and cooperation with various social actors in the immediate environment, which are listed below. The company's principle is not to make any contributions to political parties or representatives.

Actions linked to public administration

Generalitat Valenciana:

- ▶ Permanent dialogue with the DG for Environmental Quality and monitoring of possible environmental episodes in the area surrounding the El Serrallo industrial estate.

Castellon City Council:

- ▶ General dialogue as a foreign capital investment company established in the city.

Almazora Town Council:

- ▶ General dialogue and sponsorship of **€5,200** for the IX Certamen "Foment de l'esperit emprendedor", the entrepreneurship competition for young people in the town, held in February 2025; and the renewal of the fleet of bicycles at the Parque de Educación Vial.

Port of Castellon:

UCE is the concessionaire of a facility in the port for loading, unloading and storage of chemical products. During 2024, progress was made with the project to install unloading arms at the new

liquid bulk terminal in the southern dock of the Port of Castellon, with commissioning scheduled for April 2025.

Participation in conferences and forums during 2024

- ▶ Conference "**Transforming without losing: challenges for industrial competitiveness**", organised by Plastics Europe at Plastics & Rubber⁴¹
- ▶ **5th International Congress on Advances in the Packaging Industry (Milan)**
- ▶ **SOMMa Connect**⁴², for the promotion of collaboration between research centres and companies moving towards an innovative, technological and socially advanced society, organised by the Alliance of Severo Ochoa Centres of Excellence and María de Maeztu Units of Excellence (SOMMa) and the Institute of Molecular Science of the University of Valencia.
- ▶ **Third Meeting of the LAB Mediterráneo Foundation** on entrepreneurship and open innovation to promote collaboration between start-ups and large companies.



with the aim of fostering solidarity awareness and collaboration with the social environment of Castellon. In December, the traditional blood donation campaign was organised, with the support of the **Transfusion Centre of the Valencian Community**, and the group of volunteers collaborated in the delivery of toys to the local **Red Cross**. In June, the Transfusion Centre of the Valencian Community in Castellon recognised the solidarity of 70 companies in the province that actively collaborate in blood donation campaigns. UBE was one of the companies highlighted for its almost **550 donations over fourteen years**.



Voluntary activities

The **Volunteering Promotion Group** is in charge of planning and promoting the collective volunteering activities proposed to the rest of the staff,



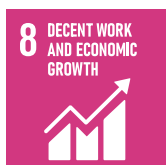
⁽⁴¹⁾ <https://mundoplast.com/jornada-de-plastics-europe-en-plastics-rubber/>

⁽⁴²⁾ <https://somma.es/news/somma-connect/>

8.1.4 Partnerships and sponsorships

Relationship with non-profit organisations

In fiscal year 2024 UBE made donations to social entities in Castellon to help vulnerable groups and people at risk of social exclusion, with a total amount of **83,100** euros. The main beneficiary entities for these purposes were:



- ▶ Castellon Food Bank. It provided assistance to almost 19,000 people with economic difficulties throughout the province, in collaboration with 90 organisations.

- ▶ Red Cross. Maintained various actions for the reception of refugees in the Valencian Community due to the invasion of Ukraine, strengthening the integral itineraries of social support with the people received.

- ▶ Caritas
- ▶ Spanish Association Against Cancer
- ▶ Down Syndrome Foundation
- ▶ Adecco Foundation
- ▶ Centre The CAU
- ▶ El Rinconet Farm School
- ▶ Telephone of Hope

On the occasion of the **tragic floods in the province of Valencia** in October 2024, UBE Corporation Europe and its parent company UBE Corporation donated **€50,000** to humanitarian organisations for urgent assistance to the most vulnerable and poorest people in the affected areas.



Sports clubs and activities.

The company sponsored the following clubs and athletic events in the Castellon area, to promote sporting activities in grassroots clubs and with children and young people: Club L'illa Grau Voleibol, CD Almazora, CD Balomano Castellon, CF San Pedro, C. Fútbol Sala de Castellon, Club Nou Basket Femení Castello, Il Volta al Terme de les Tarongetes, Carrera Trofeo Luis Adsuara. The total amount was **23,900** euros.



Academic entities and activities

Castellon Jaume I University (UJI)

The **UBE Chair in Sustainable Plastics at the Universitat Jaume I**, maintained its commitment to dissemination, education and research to promote a more sustainable use of plastics during the 2024 financial year. The most outstanding activities during the 2024 financial year were the holding of a day on plastic recycling with more than 200 students, including talks and practical workshops, the school competition "Let's make plastic circular" to promote the responsible management of plastic waste among young people and the "Sea without Plastic" event with talks and a beach clean-up day to raise awareness of the impact of plastics in the sea.

The **3rd Plastics Sustainability Awards** granted by the **Chair** went to:

Carlos Lázaro Hernández, first prize, for his thesis "Desarrollo y Caracterización de Formulaciones de Ácido Poliláctico con Citrato de Trietilo para Materiales de Fabricación Aditiva," carried out in the Master's programme in Engineering, Processing and Characterisation of Materials at the Universitat Politècnica de València (UPV).

Alexandra Llidó Barragán, second prize, for her thesis "Revalorización de un Residuo Agrícola, la Alcachofa Cynara Scolymus, para el Desarrollo de una Economía Circular en Aplicaciones Industriales," also carried out in the same UPV programme.

UBE is a collaborating company in the **Master's Degree in Industrial Process Management**, and a trustee of the **Castellon Jaime I University-Enterprise Foundation**. The contributions for all these concepts in 2024 amounted to **42,000** euros.

The UJI also represents a source of knowledge and talent for the company, which represents an important employment and training opportunity. In recent years more than 40 graduates from the UJI have been incorporated in various areas and the company actively participates in the curricular and extracurricular internship programme and in the UJI Job Fair.

Castellon CSR Board

UCE is an active member of the **Mesa de la RSC de Castellon**, a forum made up of around 50 companies and NGOs in the province for the promotion of Corporate Social Responsibility.

8.2 SUBCONTRACTING AND SUPPLIERS

[2.8 / 204.1 / 308.1 / 308.2 / 407.1 / 408.1 / 409.1 / 414.1 / 414.2]

8.2.1 Purchasing, suppliers and contractors

At UCE, the selection of suppliers of goods or services is carried out by authorised personnel and in accordance with objective and defined criteria, assessing the application of social responsibility, sustainability and compliance policies in the broadest sense. Whenever possible, we are committed to contracting local suppliers in order to promote the development of the local community. For certain raw materials or special services, a balance is sought between the competitiveness of supply and quality, the stability of the commercial relationship and the mitigation of risk due to a possible lack of suitable suppliers.

In application of the management system, all suppliers identified as relevant or critical for the activity or that may have a significant impact on compliance with legal and/or regulatory, customer, quality, health and safety and environmental requirements, are evaluated taking into account quality, corporate social responsibility, health and hygiene and environmental criteria.

The **initial evaluation** can be conducted using any of the following three tools:

- ▶ 1. Supplier Evaluation Questionnaire covering Quality, Health and Safety, Environment, and Corporate Social Responsibility;
- ▶ 2. Audit;
- ▶ 3. Specific Technical Evaluation.

To be approved as company suppliers, candidates must achieve at least 70% in each category. Based on the results, suppliers are classified into three categories:

- ▶ A. Eligible to supply, with a score of 85% or higher.
- ▶ B. Eligible to supply, with a score between 70% and 85%.
- ▶ C. Ineligible to supply, with a score below 70%.

Assessments must be renewed at least every five years. In FY2023, 57 suppliers were assessed. During FY2024, 9 suppliers were evaluated (either new or re-evaluated within the specified period), bringing the total to 303 approved suppliers. Of these, 73.6% were classified as **A**, 24.4% as **B**, and 2% as **C**.

UCE is updating the supplier evaluation and approval system with a focus on human rights, social issues and the environment, with the aim of obtaining greater commitment to collaboration in its strategic sustainability objectives, in accordance with its action plans for 2025 under the **Environmental Sustainability Master Plan**.



In addition, other **specific controls or monitoring** are carried out:

- ▶ Supplier **performance control**: this is carried out at the beginning of the following financial year, in accordance with internal procedures, and considers complaints, non-conformities, internal

audits, and IATF indicators (where applicable) for the corresponding period. In FY2024, performance control was completed for 45 suppliers that had been selected at the close of the 2023 financial year. As a conclusion in this area of control, no supplier had its category modified, and no incident with a serious impact on environmental, human, or safety aspects was detected. In general, the review of supplier-related incidents may result in the opening of non-conformities, and in some cases, complaints received from UCE customers can be attributed to supplier responsibilities after the corresponding investigation. Following the close of each financial year, the company monitors these incidents; therefore, as of the preparation date of this NFIR 2024, no conclusions are yet available for the 2024 financial year.

- ▶ **In-plant service contractors**: an annual Health, Safety and Environment monitoring and performance control is carried out for suppliers included in the List of Recommended Manufacturers. They must present the preventive model adopted in accordance with the prevention services regulations and the Occupational Risk Prevention Act. In FY2024 the monitoring and control of the FY2023 performance of **22 suppliers** was completed. During the year there was one incident in this area as a result of an occupational accident involving the sick leave of a person from a contractor company. Additional safety measures were adopted regarding machinery adjustment ranges, withdrawal of non-approved tools and training of warehouse and production personnel to reinforce the safety culture. No work was discontinued with any service provider at the plant.

- ▶ All **suppliers of raw materials, service products or chemical products** must report on compliance with European REACH/CLP regulations, safety data sheet in Spanish, declaration on the non-inclusion of SVHC substances (substances of very high concern) in the products supplied, and the non-existence of any restrictions or prohibitions. Likewise, special services such as transport and waste management, transport of dangerous goods, etc. must be in possession of all types of

registration and specific licences required for their activity.

► As an additional measure of prevention and control of safety, environment and human rights, for all **maritime transport services** for the purchase of raw materials, whichever party is responsible for the contracting of the vessel, UBE has a vetting or due diligence service. The scope includes aspects of crew human rights, training, safety, environmental and legal compliance.

► Repol continues to develop its supplier evaluation and control system, which was launched in the 2021 financial year, applying guidelines to ensure that purchased products comply with specific quality, safety and environmental requirements.

SPENDING ON LOCAL SUPPLIERS (%)	FY2022	FY2023	FY2024
	UBE Corporation Europe		
National	46	45	38
Provincial	5	8	6
	Repol		
National	77	70	72
Provincial	17	31	18

As mentioned in point **5.1 Introduction**, the number of full-time equivalent workers represented by the staff of contracting companies who regularly provide services at UCE is equivalent to an average of 255 persons per day. The work is subject to a service contract and the main functions are warehouse management, maintenance, office cleaning, ecopark management, weighing and control of lorry loads etc.

8.3 CONSUMERS

[2.22 / 2.23 / 2.24 / 2.25 / 2.27 / 416.1 / 416.2 / 417.1 / 417.2 / 417.3 / 418.1]

8.3.1 Health and safety

The company does not sell directly to consumers, although part of its products are incorporated in the manufacturing processes of industrial and professional consumer products. At year-end there were no open cases of non-compliance with consumer protection regulations.



In the hypothetical detection of any product that could pose a risk to the end user and be unsuitable for consumption, the **recall procedure** established in the management system would be activated. Throughout 2024, no product incident related to food or automotive safety has been received at UCE or Repol that would have led to the initiation of this type of process in these two key markets for the company. The company has carried out a mock withdrawal with satisfactory results.

As indicated in point 2.5, UCE **monitors** its products to ensure that they are suitable for their corresponding use, always complying with the necessary requirements to safeguard the safety and health of end consumers and the people involved in their transformation, handling or transport. This protection is carried out through the study, analysis and registration of substances with the ECHA (European Chemicals Agency) and



adaptation to *CLP* regulations (Classification, Labelling and Packaging of Hazardous Substances and Mixtures) as well as other registrations and equivalent regulations for markets outside the European Union and their corresponding application.

Beyond mere legal compliance, the company actively pursues continuous improvement by participating in voluntary initiatives, such as:

- ▶ The project promoted by CEFIC (European Chemical Industry Council) to update REACH registration dossiers with ECHA, which resulted in five re-evaluated registrations during 2024.
- ▶ The voluntary preparation of safety data sheets.
- ▶ The issuance of voluntary product information certificates upon customer request.
- ▶ The annual declaration of non-scheduled drug precursors.

The goods produced are labelled according to their hazard classification and, in the case of fertilisers or other products, according to their application. The company automatically informs each customer of the corresponding Safety Data Sheets for their goods. This information can be provided upon request through the usual contacts in the business units or through the contact mailbox on the website.

No breaches of applicable regulations or standards relating to marketing communications, advertising, promotion or sponsorship have been recorded during the financial year 2024.

8.3.2 Complaints and claims

[418.1]

Customer incidents are collected through the different business units, reaching the Quality Assurance department, which is responsible for coordinating the investigation of the causes with the different departments involved, and the establishment of immediate contingency and/or corrective actions.

All incidents received from customers are analysed in a similar way, if the analysis concludes that the incident is not the responsibility of UBE Corporation Europe, it is classified as a "**complaint**" (or "**not claim**"). When the incident is the responsibility of the company, it is classified as a "**claim**". According to the complaint procedure of the management system, complaints are received, recorded and managed until resolution and closure. By April 2025, one month after year-end 2024, UCE had closed 93.5%. Repol manages complaints and grievances through a claim procedure and by April 2025, 88% of the incidents received had been closed. No complaints related to loss or privacy of customer data have been received.



8.4 TAX INFORMATION TAXATION. MANAGEMENT, GOVERNANCE AND CONTROL APPROACH. EXTERNAL EVALUATION. INFORMATION BY COUNTRY.

[207.1 / 207.2 / 207.3 / 207.4]

The tax policy is based on strict compliance with all tax obligations to which the organisation is subject, without using aggressive tax structures.

The company has a **Policy of Good Fiscal and Tax Practices** in its management system, based on compliance with fiscal and tax regulations, the adoption of tax positions based on economic and business motives following accepted practices, avoiding aggressive tax planning schemes or practices; the prevention and reduction of significant fiscal and tax risks; the fostering of a relationship with the tax authorities based on respect for the law, loyalty, trust, professionalism, collaboration, reciprocity and good faith, without prejudice to legitimate disputes which, while respecting the foregoing principles and in defence of the social interest, may arise with these authorities regarding the interpretation of the applicable rules; the prioritisation of non-litigation channels for the resolution of conflicts; and the establishment of relations with the tax authorities based on the principles of transparency and legal certainty.

All UCE Group companies must comply with the deadlines for filing and paying taxes correctly, and respond appropriately, transparently and fully to the requirements received from the tax authorities. The aim is to contribute to the public budget according to the economic capacity of the company and to consider the administration as a qualified partner in the provision of infrastructure services, public services, health, education, training or protection. **Tax management is the responsibility of the Finance Area** and the tax approach is integrated with the organisation's accounting, the business units and the R&D Area.

R&D projects are documented and certified resulting in a binding motivated report that enables the corresponding tax deductions. The company holds an authorization for the customs regime of inward processing. The organization benefits from the import VAT deferral regime established by the tax authorities, as well as the monthly VAT refund scheme. UCE prepares a transfer pricing report for each closed fiscal year, ensuring proper tax compliance in every country where it operates.

The **tax management approach is assessed by quantifying the number of requests** from the tax administration in an annual period, weighted by the amount in euros claimed. Based on this indicator, the need to review the current management approach is studied. The evaluation results for fiscal year 2023 were satisfactory, and no changes to the approach were required. Likewise,



inspection reports received are analyzed to improve compliance with tax legislation.

Tax risks are identified by analysing each of the taxes to which the organisation is subject, the most important of which are: corporate tax, VAT, IAE, IBI, special taxes on electricity, transfer prices, tariffs and special environmental taxes.

Notifications of any concerns regarding unethical or illegal conduct in relation to taxation can be made through the internal whistleblowing channel EC-Line. No such reports have been received during the year. The external financial audit verifies the organisation's tax compliance.

The individual representative of the sole director

sets the broad lines of tax policy, although this may be influenced by the tax policy and dividend payment strategy of the parent company in Japan.

The Spanish Tax Administration Agency, the Valencian Tax Agency and Castellon City Council manage the application of taxes within their respective jurisdictions, with regulatory changes depending on legislative actions at the state, regional and local levels, and their corresponding system of participation and consultation. The company monitors regulatory changes and the creation of new taxes that may directly affect it, channeling any actions through the business organizations to which it belongs and whose representation is recognized by the authorities.

8.4.1 Profits

[201.1 / 207.4]

INCOME, PROFITS AND DIVIDENDS BY FISCAL YEAR	SPAIN		GERMANY		BRAZIL		MEXICO		
	(thousand €)	2023	2024	2023	2024	2023	2024	2023	2024
Consolidated income		467,007	510,544	0	0	0	0	0	0
Revenue (turnover)		386,879	419,023	84,702	95,772	1,025	877	1,449	1,111
Profits obtained (profit after tax)		7,107	-4,721	849	1,797	23	-10	18	36
Dividends		4,006	679						

8.4.2 Taxes and subsidies

[201.4 / 207.4]

REVENUES, TAXES AND SUBSIDIES BY FISCAL YEAR	SPAIN		GERMANY		BRAZIL		MEXICO		
	(thousand €)	2023	2024	2023	2024	2023	2024	2023	2024
Revenue (turnover)		386,879	419,023	84,702	95,772	1,025	877	1,449	1,111
Tax on profits		-374	-2,716	379	825	20	30	31	13
Capital subsidies charged to results		12,183	7,833	0	0	0	0	0	0
Operating subsidies recognized as income		4,378	325	0	0	0	0	0	0
Credits / tax deductions Applied to results		72	0	0	0	0	0	0	0
Financial incentives Applied to results		4,450	325	0	0	0	0	0	0

8.5. OTHER SIGNIFICANT INFORMATION

8.5.1 Free competition

[206.1]

The Crime Prevention Programme and the Ethics System promote the preservation of free competition. Any meeting with direct competitors must be authorised in advance based on the proposed agenda, and any exchange of information or comments that could lead to market-sharing or price-fixing agreements is strictly prohibited. At the start of meetings organised by business associations, participants are systematically reminded that discussing matters that could enable or suggest a restrictive effect on free competition is forbidden.

The group has not been involved in any legal proceedings related to anti-competitive practices.



9. GRI CONTENTS INDEX

Part I: About this report. Statement of use.

[2.3 / 2.4 / 2.5]

This Statement of Non-Financial Information of UBE Corporation Europe S.A. Unipersonal (UCE) responds to Law 11/2018 of 28 December, which requires companies to submit a report in response to Directive 2014/95/EU, which calls for the disclosure of non-financial information, particularly in social and environmental matters. UBE Corporation Europe, S.A. Unipersonal has presented the information cited in this **GRI contents index** for the period from 1 April 2024 to 31 March 2025, using the **GRI Standards** as a reference. GRI 1: Fundamentals 2021 has been used in order to report detailed and accurate information on its social, environmental and economic impacts, beyond the legislative requirements.

The document presents non-financial reporting data for **fiscal year 2024 (FY2024)**. This reference is used because UCE is part of the Japanese group UBE Corporation, which operates on the basis of fiscal years.

The reporting cycle is annual, and this is the fifth year in which UCE publishes a document of this nature. Since fiscal year 2019, the international Global Reporting Initiative (GRI) methodology has been applied for the preparation of social responsibility reports. This report will be published before 31 October 2025 at **www.ube.es** and, together with previous reports, will be available in the download section of the corporate website⁴³. In this report, Section 4.1 has been updated with Scope 2 emissions data for fiscal years 2022 and 2023, correcting the emission factors attributable to purchased electricity at UCE. The adjustment results in higher CO₂-equivalent emissions for these two years, a temporary increase that remains consistent with the reduction targets set

for 2030. Likewise, in section 4.4.2, the figure for electricity sold by UCE in 2023 has been corrected due to a transcription error, thereby increasing the total energy consumption reported for that year. The tables in section 4.2.1 have been updated for 2022 and 2023 due to the reclassification of some types of waste destined for recovery, from the table of indicator 306-5 to that of 306-4. The 2023 waste data has also been corrected due to a transcription error that had omitted 290 metric tons of various waste, which had been properly recorded and managed in 2023.

The **geographical coverage of this document** includes Europe and Latin America through delegations and offices in Castellon and Almasora (Spain), Düsseldorf (Germany), Sao Paulo (Brazil) and Mexico City (Mexico).

This report has been externally verified by LRQA España S.L.U. according to the corresponding **verification statement**. There is no link between UCE and the verification company. The verification process involved the participation of the company's technical staff, including an interview of the verifiers with the president of UCE, focusing on the strategic aspects and perspectives of the company.

For any questions regarding this document, please contact Pablo Cruz Orozco (p.cruz@ube.com ; UBE Corporation Europe. Phone +34 964738000).

⁽⁴³⁾ <https://ube.es/es/descargas/>

Part 2:
GRI contents index.
Correspondence with the SDGs

Section of the report	GRI 2 General Contents 2021	GRI 3 Material Themes 2021	Economic GRI 201-2016 GRI 202-2016 GRI 203-2016 GRI 204-2016 GRI 205-2016 GRI 206-2016 GRI 207-2019	Environmental GRI 301-2016 GRI 302-2016 GRI 303-2018 GRI 304-2016 GRI 305-2016 GRI 306-2020 GRI 308-2016	Social GRI 401-2016/GRI 402-2016 GRI 403-2018/GRI 404-2016 GRI 405-2016/GRI 406-2016 GRI 407-2016/GRI 408-2016 GRI 409-2016/GRI 410-2016 GRI 411-2016/GRI 413-2016 GRI 414-2016/GRI 415-2016 GRI 416-2016/GRI 417-2016 GRI 418-2016	Sustainable Development Goals
1. Letter from the president	2.22/ 2.23/2.24					
2. Introduction	2.1 / 2.2 /2.22		201.1		413.2	
2.1 Business environment and economic performance	2.1 / 2.2 / 2.22		201.1			SDG 8 SDG 9
2.2 Organisation and structure of the company	2.1 / 2.2 / 2.9 2.10 / 2.11 2.12 / 2.13 2.14 / 2.15 2.16 / 2.17 2.18 / 2.19				405.1	
2.3 Activities, value chain, business model and products	2.6			301.1		SDG 12
2.4 Objectives and strategies	2.18 / 2.22 2.23 / 2.24 2.25	3.3			413.2	SDG 9 SDG 13
2.5 Main factors and trends likely to affect future developments	2.23 / 2.24 2.25 / 2.27 2.28	3.1 / 3.2				
3. Materiality matrix	2.29	3.1 / 3.2 / 3.3			413.2	
4. Environment	2.22 / 2.23 / 2.24 / 2.25 2.27	3.3	201.2			SDG 7 SDG 8 SDG 13
4.1 Climate Change	2.22 / 2.23 / 2.24 / 2.25	3.3	201.2	302.5 / 305.1 305.2 / 305.3 305.4 / 305.5		SDG 12 SDG 13
4.2 Circular economy 4.2.1 Waste 4.2.2 Food waste	2.22 / 2.23 / 2.24 / 2.25	3.3		306.2 / 306.4 306.1 / 306.3 306.5		SDG 3 SDG 11 SDG 12
4.3 Emissions 4.3.1 Atmospheric emissions 4.3.2 Noise 4.3.3 Light pollution 4.3.4 Other environmental vectors, water				305.7 303.1 / 303.2 303.4 / 303.3 303.5		SDG 3 SDG 6 SDG 11 SDG 13 SDG 14

Section of the report	GRI 2 General Contents 2021	GRI 3 Material Themes 2021	Economic GRI 201-2016 GRI 202-2016 GRI 203-2016 GRI 204-2016 GRI 205-2016 GRI 206-2016 GRI 207-2019	Environmental GRI 301-2016 GRI 302-2016 GRI 303-2018 GRI 304-2016 GRI 305-2016 GRI 306-2020 GRI 308-2016	Social GRI 401-2016/GRI 402-2016 GRI 403-2018/GRI 404-2016 GRI 405-2016/GRI 406-2016 GRI 407-2016/GRI 408-2016 GRI 409-2016/GRI 410-2016 GRI 411-2016/GRI 413-2016 GRI 414-2016/GRI 415-2016 GRI 416-2016/GRI 417-2016 GRI 418-2016	Sustainable Development Goals
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5 Labor and social issues						SDG 8
5.1 Introduction 5.2 Health and safety 5.2.1 Safety and health at work 5.2.2 Work-related accidents 5.2.3 Occupational diseases. Health promotion	2.7 / 2.8 2.26	3.3		306.3 derrames	403.1 / 403.2 / 403.4 / 403.8 / 403.3 / 403.5 403.7 403.6 / 403.9 / 403.10	SDG 3 SDG 8
5.3 Social relations 5.3.1 Social dialogue 5.3.2 Collective agreements	2.26 2.19 / 2.20 / 2.30	3.3	201.3		407.1 / 408.1 / 409.1 401.2	SDG 8
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5.5 Work organization 5.5.1 Working time 5.5.2 Absenteeism rate 5.5.3 Work-life balance					401.3	
5.6 Training					404.1 / 404.2 / 404.3	
5.7 Universal accessibility						
5.8 Equality 5.8.1 Equality between men and women 5.8.2 Discrimination					406.1	
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Section of the report	GRI 2 General Contents 2021	GRI 3 Material Themes 2021	Economic GRI 201-2016 GRI 202-2016 GRI 203-2016 GRI 204-2016 GRI 205-2016 GRI 206-2016 GRI 207-2019	Environmental GRI 301-2016 GRI 302-2016 GRI 303-2018 GRI 304-2016 GRI 305-2016 GRI 306-2020 GRI 308-2016	Social GRI 401-2016/GRI 402-2016 GRI 403-2018/GRI 404-2016 GRI 405-2016/GRI 406-2016 GRI 407-2016/GRI 408-2016 GRI 409-2016/GRI 410-2016 GRI 411-2016/GRI 413-2016 GRI 414-2016/GRI 415-2016 GRI 416-2016/GRI 417-2016 GRI 418-2016	Sustainable Development Goals
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Part 3:
GRI contents index

The following standards have been used as a reference for the preparation of this report:

GRI 1 Fundamentals 2021; GRI 2 General Contents 2021; GRI 3 Material Topics 2021; GRI 201: Economic Performance 2016; GRI 202: Market Presence 2016; GRI 203: Indirect Economic Impacts 2016; GRI 204: Sourcing Practices 2016; GRI 205: Anti-corruption 2016; GRI 206: Unfair Competition 2016; GRI 207: Taxation 2019; GRI 301: Materials 2016; GRI 302: Energy 2016; GRI 303: Water and Effluents 2018; GRI 304: Biodiversity 2016; GRI 305: Emissions 2016; GRI 306-3 (2016): Spills; GRI 306: Waste 2020; GRI 308: Supplier Environmental Assessment 2016; GRI 401: Employment 2016;

GRI 402: Worker-Company Relations 2016; GRI 403: Occupational Health and Safety 2018; GRI 404: Training and Education 2016; GRI 405: Diversity and Equal Opportunity 2016; GRI 406: Non-Discrimination 2016; GRI 407: Freedom of Association and Collective Bargaining 2016; GRI 408: Child labour 2016; GRI 409: Forced or compulsory labour 2016; GRI 410: Security practices 2016; GRI 411: Rights of indigenous peoples 2016; GRI 413: Local communities 2016; GRI 414: Social assessment of suppliers 2016; GRI 415: Public policy 2016; GRI 416: Customer health and safety 2016; GRI 417: Marketing and labelling 2016; GRI 418: Customer privacy 2016;

GRI Standard	Section / direct response
GRI 2 General Disclosures 2021	
2.1 Organisational details	2.1 Business environment 2.2 Organisation and structure of the company
2.2 Entities included in the report	
2.3 Period, frequency, contact	9. GRI Contents index. Part 1 About this report Annex 2: Assurance statement
2.4 Updating information	
2.5 External verification	
2.6 Activities, value chain, other business activities	2.3 Business model, markets and products
2.7 Employees	5. Labor and social issues 5.1 Introduction / 5.4.1 Employees / 5.4.2 Modalities of contracts 8.2.1 Purchasing, suppliers and contractors
2.8 Workers who are not employees	
2.9 Governance structure and composition	2.2 Organisation and structure of the company.
2.10 Highest governing body	
2.11 Chair of the highest governance body	
2.12 Role of the highest governance body in overseeing the management of impacts	
2.13 Delegation of responsibility for managing impacts	
2.14 Role of the highest governance body in sustainability reporting	
2.15 Conflicts of interest	2.2 Organisation and structure of the company. 7. Ethics and compliance. The sole shareholder is informed.

2.16 Communication of critical concerns	2.2 Organisation and structure of the company.
2.17 Collective knowledge of the highest governance body	2.2 Organisation and structure of the company. Management training.
2.18 Performance evaluation of the highest governance body	2.2 Organisation and structure of the company. 2.4 Objectives and strategies
2.19 Remuneration policies	2.2 Organisation and structure of the company 5.3.2 Collective agreements
2.20 Process to determine remuneration	5.4.4 Remuneration and wage gap There is a bonus linked to the achievement of objectives, including strategic ones, which include impact management.
2.21 Annual total compensation ratio	6,94 (ratio of annual total compensation of the highest paid person in the organisation to the median annual total compensation of all employees, excluding the highest paid person) 2,05 (ratio of the percentage increase in the annual total compensation of the highest paid person in the organisation to the median percentage increase in the annual total compensation of all employees excluding the highest paid person)
2.22 Statement of Sustainable Development Strategy	1. Letter from the president(statement) 2.1 Business environment and economic performance (communication with stakeholders) 2.4 Objectives and strategies (commitments and policies)
2.23 Policy Commitments	2.5 Main factors and trends likely to affect future developments (risk management, regulatory monitoring)
2.24 Embedding policy commitments	4. Environment / 4.1 Climate change / 4.2 Circular economy
2.25 Processes to remediate negative impacts	6.1 Evaluation of Human rights (commitments and policies) 7. Ethics and compliance 8.1 Commitments to sustainable development and society 8.3 Consumers. Complaints and claims
2.26 Mechanisms for seeking advice and raising concerns	5.2 Health and safety (participation) 5.3.1 Social dialogue (participation and consultation) 7. Ethics and compliance (warning channel) 8.1 Commitments to sustainable development and society
2.27 Compliance with laws and regulations (no. of fines, cases of non-compliance)	2.5 Main factors and trends likely to affect future developments (risk management, regulatory monitoring) 4. Environment 6.1 Evaluation of Human rights 7. Ethics and compliance (System Operation) 7.1 Corruption and bribery 7.2 Money laundering 8.3 Consumers
2.28 Membership associations	2.5 Main factors and trends likely to affect future developments
2.29 Approach to stakeholder engagement	3. Materiality matrix
2.30 Collective bargaining agreements	5.3.2 Collective bargaining agreements (100% of staff in Spain. 80% of total)

GRI 3 Material Topics 2021	
3.1 Process of determining the material issues 3.2 List of material items	2.5 Main factors and trends likely to affect future developments 3. Materiality matrix
3.3 Management of material issues	2.4 Objectives and strategies 3. Materiality matrix 4. Environment (4.1 Climate change / 4.2 Circular economy) 5. Social and personnel issues / 5.2 Health and safety 5.3 Social relations 6.1 Evaluation of Human rights 7. Ethics and Compliance / 7.1 Corruption and Bribery 8.1 Commitments to sustainable development and society
GRI 201: Economic Performance 2016	
INDICATOR	Section / direct response
201.1 Direct economic value generated and distributed	2.1 Business environment and economic performance
201.2 Financial implications and other risks and opportunities due to climate change	4. Environment
201.3 Defined benefit and other pension plan obligations	5.3.2 Collective agreements Pension scheme
201.4 Financial assistance received from the government	8.4.2 Taxes and subsidies
GRI 202: Market presence 2016	
202.1 Ratios of standard entry level wage by gender compared to local minimum wage	5.4.4 Remuneration and wage gap
202.2 Proportion of senior executives recruited from the local community	5.4.1 Employees
GRI 203: Indirect Economic Impacts 2016	
203.1 Infrastructure investments and supported services	8.1.2 Local populations and territory
203.2 Significant indirect economic impacts	
GRI 204: Procurement Practices 2016	
204.1 Proportion of expenditure on local suppliers	8.2.1 Purchasing, suppliers and contractors
GRI 205: Anti-Corruption 2016	
205.1 Operations assessed for corruption-related risks	7. Ethics and compliance
205.2 Communication and Training on Anti-Corruption Policies and Procedures	7.1 Corruption and bribery
205.3 Confirmed cases of corruption and measures taken	
GRI 206: Anti-competitive Behavior 2016	
206.1 Legal actions for anti-competitive behavior, anti-trust, and monopolistic practices	8.5.1 Free competition

GRI 207: Tax 2019	
207.1 Approach to tax	8.4 Tax information
207.2 Task governance. Control and risk management	
207.3 Stakeholder engagement and management of stakeholder concerns related to tax	
207.4 Country-by-country reporting	8.4.1 Profits 8.4.2 Taxes and subsidies
ENVIRONMENT	
GRI 301: Materials 2016	
INDICATOR	Section / direct response
301.1 Materials used by weight or volume	2.3 Business model, markets and products
301.2 Recycled inputs materials used	Percentage not considered significant
301.3 Reclaimed products and their packaging materials	<u>Not available</u> : The production process includes reprocessing cycles if necessary, avoiding rejects. Packaging material is not recovered.
GRI 302: Energy 2016	
302.1 Energy consumption within the organisation	4.4.2 Energy consumption
302.2 Energy consumption outside the organisation	
302.3 Energy intensity	
302.4 Reduction of energy consumption	
302.5 Reduction of energy requirements of products and services	4.1 Climate Change (Carbon footprint of finished products has been calculated to facilitate improvements in the value chain)
GRI 303: Water and Effluents 2018	
303.1 Interaction with water as a shared resource	4.3.4 Other environmental vectors. Emissions to water
303.2 Management of water discharge-related impacts	
303.3 Water withdrawal	
303.4 Water discharge	4.3.4 Other environmental vectors. Emissions to water
303.5 Water consumption	

GRI 304: Biodiversity 2016	
304.1 Operational sites owned, leased or managed land located within or adjacent to protected areas or areas of high biodiversity value outside protected areas	4.5 Biodiversity protection
304.2 Significant impacts of activities, products and services on biodiversity	
304.3 Habitats protected or restored	
304.4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	
GRI 305: Emissions 2016	
305.1 Direct GHG emissions (Scope 1)	4.1 Climate change
305.2 Energy-related indirect GHG emissions (Scope 2)	
305.3 Other indirect GHG emissions (Scope 3)	
305.4 GHG emissions intensity	
305.5 GHG emission reductions	
305.6 Emissions of ozone-depleting substances (ODS)	<u>Not available.</u>
305.7 Nitrogen oxides (NO _x) , sulphur oxides (SO _x) and other significant air emissions	4.3.1 Atmospheric emissions
GRI 306: Waste 2020	
306.1 Generation of waste and significant waste-related impacts	4.2.1 Waste
306.2 Management of significant waste-related impacts	4.2 Circular economy
306.3 Waste generated	4.2.1 Waste
306.4 Wastes diverted from disposal	4.2. Circular economy / 4.2.1 Waste
306.5 Waste directed to disposal	4.2.1 Waste
306.3 Significant spills (GRI 306: Effluents and Waste 2016)	5.2.2 Work-related accidents
GRI 308: Supplier Environmental Assessment 2016	
308.1 New suppliers that were screened using environmental criteria	8.2 Subcontracting and suppliers 8.2.1 Purchasing, suppliers and contractors
308.2 Negative environmental impacts in the supply chain and actions taken	

GRI 401: Employment 2016	
INDICATOR	Section / direct response
401.1 New employee hires and employee turnover	5.4.3 New hires and dismissals
401.2 Benefits provided to full-time employees that are not provided to part-time or temporary employees	5.3.2 Collective agreements
401.3 Parental leave	5.5.3 Work-life balance
GRI 402: Labor-management relations 2016	
402.1 Minimum notice periods regarding operational changes	5.4.1 Employees
GRI 403: Occupational Health and Safety 2018	
403.1 Occupational health and safety management system	5.2 Health and safety 5.2.1 Safety and health at work
403.2 Hazard identification, risk assessment and incident investigation	
403.3 Occupational health services	
403.4 Worker participation, consultation and communication on occupational health and safety	
403.5 Worker training on occupational health and safety	
403.6 Promotion of worker health	5.2.3 Occupational diseases. Health promotion
403.7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	5.2.1 Safety and health at work
403.8 Workers covered by an occupational health and safety management system	5.2 Health and safety 5.4 Labor. External personnel
403.9 Work-related injuries	5.2.2 Accidents at work
403.10 Work-related ill health	5.2.3 Occupational diseases. Health promotion
GRI 404: Training and education 2016	
404.1 Average hours of training per year per employee	5.6 Training
404.2 Programs for upgrading employee skills and transition assistance programs	
404.3 Percentage of employees receiving regular performance and career development reviews	

GRI 405: Diversity and Equal Opportunities 2016	
405.1 Diversity of governing bodies and employees	2.2 Organisation and structure 5.4.1 Employees
405.2 Ratio of basic salary and remuneration of women to men	5.4.4 Remuneration and wage gap
GRI 406: Non-discrimination 2016	
406.1 Cases of discrimination and corrective actions taken	5.8.2 Discrimination 7 Ethics and compliance
GRI 407: Freedom of Association and Collective Bargaining 2016	
407.1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	5.3.1 Social dialogue 5.3.2 Collective agreements 8.2 Subcontracting and suppliers
GRI 408: Child Labor 2016	
408.1 Operations and suppliers at significant risk for incidents of child labour	5.3.1 Social dialogue 5.3.2 Collective agreements 8.2 Subcontracting and suppliers
GRI 409: Forced or Compulsory labour 2016	
409.1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	5.3.1 Social dialogue 5.3.2 Collective agreements 8.2 Subcontracting and suppliers
GRI 410: Security Practices 2016	
410.1 Security personnel trained in human rights policies or procedures	6.1 Evaluation of Human rights
GRI 411: Indigenous Peoples' Rights 2016	
411.1 Incidents of violations involving rights of indigenous peoples	<u>Not applicable</u> as Spanish and EU labour legislation is in force.
GRI 413: Local Communities 2016	
413.1 Operations with local community engagement, impact assessments and development programs	8.1. Commitments to sustainable development and society
413.2 Operations with significant actual and potential negative impacts on local communities	2.1 Business environment and economic performance 2.4 Objectives and strategies 3 Materiality matrix
GRI 414: Supplier Social Assessment 2016	
414.1 New suppliers that were screened using social criteria	8.2.1 Purchasing, suppliers and contractors
414.2 Negative social impacts in the supply chain and actions taken	

GRI 415: Public Policy 2016	
415.1 Political contributions	8.1.3 Local communities
GRI 416: Customer Health and Safety 2016	
416.1 Assessment of the health and safety impacts of product and service categories	8.3 Consumers
416.2 Incidents of non-compliance concerning the health and safety impacts of product and services	8.3.1 Health and safety
GRI 417: Marketing and Labelling 2016	
417.1 Requirements for product and service information and labelling	8.3 Consumers
417.2 Incidents of non-compliance concerning products and service information and labelling	8.3.1 Health and safety
417.3 Incidents of non-compliance concerning marketing communications	
GRI 418: Customer Privacy 2016	
418.1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	8.3.2 Complaints and claims

ANNEX 1: Study by the Castellon Jaime I University to identify the impacts of UCE's activity.

In 2019 and 2023, the **Practical Ethics and Democracy** study group of the Castellon Jaime I University carried out the study for the identification of UCE's impacts and materiality matrix. To this end, online questionnaires were sent and assessment interviews were conducted with a selection of people, companies and institutions, representative of the UCE Group's stakeholders, drawing up the corresponding map and matrix. In accordance with the GRI Standard, a Likert scale

was used, assigning each impact a value between 1 and 5, with 1 being "not relevant at all" and 5 being "very relevant", from the perspective of the person surveyed, appealing to their relationship with UCE. All of the impacts were considered relevant, with a score of more than 3 out of a range of 1 to 5, and no strong discrepancies were detected between UCE and its stakeholders regarding the importance given to each impact.

STAKEHOLDER RESPONSE TO THE IMPACT ASSESSMENT (2023)	QUESTIONNAIRES		Response rate
	Sent to	Received	
Clients	38	11	28.9
Staff	500	173	34.6
UCE executives	29	16	55.2
Suppliers	17	13	76.5
Local community	45	15	33.3
Neighboring companies (INDES)	8	4	50
UBE Corporation (Japan)	9	2	22.2
Total	646	234	36



Impact matrix

In order to compile the matrix, data from customers, staff, suppliers, community, neighbouring companies and UBE Corporation (parent company in Japan) were grouped into a single average to present "importance for stakeholders" on the y-axis, and data from UCE management was taken to represent "importance for UCE" on the x-axis. There are no strategic impacts for either UCE or its stakeholders, i.e. impacts that are only

relevant to one of the parties. All impacts assessed scored 3 or higher for both UCE and its stakeholders.

It should be noted that these results do not imply a positive assessment of UBE's management or performance in terms of these impacts. What it does reflect is the current interest of both UBE and its stakeholders in these impacts.



**IMPACT RANKING LIST ACCORDING
TO THE UPDATED STUDY IN 2023.**

IMPACT	AVERAGE 2023	AVERAGE 2019	POSITION 2023/19	VARIA- TION
Sound corporate governance and regulatory compliance	4,68	4,34	1/1	↔
Occupational health and safety	4,63	4,12	2/10	↑
Growth and financial results	4,55	4,32	3/2	↓
Productive investment in innovation	4,45	4,24	4/5	↑
Risk and accident rate management	4,4	4,11	5/12	↑
Growth in markets and customers	4,33	4,18	6/8	↑
Talent management and retention	4,31		7/	
Working conditions and perquisites	4,23	4,2	8/7	↓
Cybersecurity and data protection	4,16		9/	
Air pollution (emissors management)	4,13	4,00	10/15	↑
Continuous improvement and management system (certifications)	4,05	4,21	11/6	↓
Waste management (reduction, reuse and recycling of raw materials)	4,03	4,11	12/12	↔
Lifecycle management/circular economy	4,01	4,12	13/11	↑
Professional development and specialized training	4	4,09	14/14	↔
Transparency and accountability	3,97	3,92	15/16	↑
Responsible and efficient use of water	3,93	3,88	16/17	↑
Biodiversity impact	3,88		17/	
Noise	3,85	3,63	18/21	↑
Corporate alignment with de Sustainable Development Goals (SDGs)	3,75		19/	
Equality and diversity management	3,75	4,25	20/4	↓
Supplier policy. Responsible supply chain management (integration of Environmental, social and governance (ESG values, transparency, sustainability, etc.)	3,65		21/	
Fomenting local socioeconomic development	3,64	4,15	22/9	↓
Evaluation of human rights impacts	3,63	3,87	23/18	↓
Alliances with society and the public authorities	3,62	3,86	24/19	↓
Light pollution	3,6	3,58	25/22	↓
Relationships with the community (civic and charity organisations)	3,55	3,79	26/20	↓
Visual pollution	3,48		27/	

ANNEX 2: Description of professional groups

Group I Specialists and operators:

Personnel trained to carry out job tasks that may require a greater or lesser degree of autonomy and initiative and may entail, under supervision, responsibility for them. The training required is Secondary Education, Intermediate Level Training Cycle or equivalent knowledge acquired in the performance of the profession.

Level 1 (UCE)
Groups 1-2 (Repol) Posts performing routine technical and/or administrative tasks.

Level 2 (UCE)
Groups 3-4 (Repol) Positions that carry out specific technical and/or highly methodical administrative activities.

Group II Managers and Operating Technicians.

Includes personnel trained to carry out functions that involve the integration, coordination and supervision of tasks of homogeneous content carried out by a group of collaborators and for the performance of tasks that have a medium intellectual activity and/or human interrelation content and that entail autonomy within the process. The training required for this group is an intermediate Technician, Higher Level Training Cycle or equivalent professional experience.

Level 3 (UCE)
Group 5 (Repol) These are posts that perform functions involving the integration and supervision of tasks of homogeneous content carried out by a group of collaborators.

Group III Technicians:

It includes personnel trained to perform functions that involve the integration, coordination and supervision of various tasks in the same functional unit, carried out by a group of collaborators. It also includes personnel trained for functions involving the performance of complex and heterogeneous technical tasks, with defined global objectives and a high degree of demand for autonomy, initiative and responsibility. The training required in this case is a degree or knowledge acquired in the performance of their profession equivalent to higher and/or intermediate university studies with sufficient experience.

Level 4 (UCE)
Group 6 (Repol) These are positions that carry out technical activities within a process, acting autonomously and may have a certain level of supervision over activities carried out by third parties.

Level 5 (UCE)
Group 7 (Repol) These are posts responsible for the programming and management of a partial function with a medium/low level of development, the results of which affect in a contributory way those overall of an area.

Level 6 (UCE)
Group 8 (Repol) These are positions responsible for the programming and management of a highly-developed part-function, the results of which are important to those of a business or support area.

Levels 7 - 0 (UCE)
Group 0 (Repol) It is a management position, covers different functional areas and involves participation in the company's Management Committee and strategy committees.

ANNEX 3: Verification statement

DECLARACIÓN DE VERIFICACIÓN DEL ESTADO DE INFORMACIÓN NO FINANCIERA Y SOCIEDADES DEPENDIENTES 2024

Términos del Contrato

LRQA España S.L.U. (en adelante LRQA) ha sido contratada por UBE Corporation Europe, S.A.U. (en adelante UCE) para verificar su Estado de Información no Financiera 2024 (en adelante el Informe), correspondiente a su ejercicio finalizado el 31 de marzo de 2025, con el objetivo de dar cumplimiento a lo establecido en la Ley 11/2018, de 28 de diciembre, por la que se modifica el Código de Comercio, el texto refundido de la Ley de Sociedades de Capital aprobado por el Real Decreto Legislativo 1/2010, de fecha 2 de julio y la Ley 22/2015, de 20 de julio de Auditoría de Cuentas en materia de información no financiera y diversidad y aplicable a UCE y sociedades participadas que forma parte del Informe consolidado del Grupo. Las sociedades incluidas y sus actividades se describen en el Capítulo 2.1 del Informe.

Esta declaración de verificación ha sido preparada para el grupo de UBE Corporation Europe.

Criterios

Este Informe se ha preparado de acuerdo y teniendo en cuenta:

- Los requisitos incluidos en la Ley 11/2018
- La guía para la elaboración de memorias de sostenibilidad del *Global Reporting Initiative* (estándares GRI)
- Norma ISAE3000 Assurance Engagement other than audits or reviews of Historical Financial Information

Responsabilidades y procedimiento seguido

La formulación del Informe, así como el contenido de éste es responsabilidad del Administrador de UCE, quien también es responsable de definir y mantener los sistemas de gestión y control interno de los que se obtiene la información para asegurar que el Informe esté libre de incorrección material debida a fraude o error. Nuestra responsabilidad es emitir una declaración de verificación independiente basado en los procedimientos aplicados en nuestra revisión.

UCE preparó el Informe que fue verificado en su redacción final de fecha 31 de mayo de 2025; dicho Informe incluye información y datos sobre las cuestiones ambientales, sociales, relativas al personal, incluyendo su seguridad y salud, derechos humanos, incluyendo diversidad e igualdad de oportunidades, lucha contra la corrupción y soborno y desempeño social externo.

Nuestro trabajo de revisión ha consistido en la formulación de preguntas a la Dirección, y responsables de diferentes Áreas que han participado en la elaboración del Informe y en la aplicación de ciertos procedimientos analíticos y pruebas de revisión por muestreo que se describen a continuación:

- Entrevistas con los responsables de la elaboración del Informe con objeto de obtener un conocimiento sobre cómo los objetivos y políticas son considerados, implementados o integrados en la estrategia global de UCE.
- Análisis de los procesos para recopilar y validar la información contenida en el

Informe adjunto.

- Revisión de la adecuación de la estructura y contenido del Informe a la Ley 11/2018 y GRI.
- Comprobación mediante pruebas de revisión en base a selecciones muestrales de la información cualitativa y cuantitativa de los indicadores y sus fuentes de información. Las pruebas se han definido para un nivel de aseguramiento limitado.
- Contraste de que la información financiera incluida en el Informe ha sido validada por un tercero independiente.

Estos procedimientos han sido aplicados para el alcance definido en el punto 2.1 del Informe para los parámetros (información y datos) requeridos para la Ley 11/2018 y teniendo en cuenta los indicadores GRI.

Conclusiones

Como resultado de nuestra revisión no se ha puesto de manifiesto ningún aspecto que nos haga creer que la información incluida en el Informe no haya sido preparada en todos los aspectos significativos de acuerdo con la Ley 11/2018, incluyendo la fiabilidad de los datos, la adecuación de la información presentada y la ausencia de desviaciones y omisiones significativas.

Fecha: 11 Junio 2025

Firmado:

A rectangular stamp containing a handwritten signature in black ink that reads "Olga Rivas" and the LRQA logo in green capital letters to the right.

Olga Rivas Castellón
LRQA España, S.L.U.

This Assurance Statement is subject to the provisions of this legal section:

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