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CONSOLIDATED NON-FINANCIAL INFORMATION AND SUSTAINABILITY STATEMENT 2024

Atresmedia Corporación de Medios de Comunicación, S.A
and Subsidiaries

ATRESMEDIA

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General information_

ESRS 2

1 General information_

The Non-financial Information and Sustainability Statement (the Sustainability Statement or the Statement) discloses information on environmental, social and governance aspects of Atresmedia Corporación de Medios de Comunicación, S.A. and subsidiaries (Atresmedia, the Company, the Group or Atresmedia Group) to provide information that is understandable, relevant, verifiable, comparable and represented in a faithful manner on how the Group is addressing sustainability matters.

Through this Statement, Atresmedia is complying with the requirements of the Corporate Sustainability Reporting Directive (CSRD[1]) and the European Sustainability Reporting Standards (ESRS) developed by the European Financial Reporting Advisory Group (EFRAG).

BASIS FOR PREPARATION

BP-1 General basis for preparation of the sustainability statement_

The scope of consolidation in the sustainability statement is the same as that of the consolidated financial statements of Atresmedia Corporación de Medios de Comunicación, S.A. and its subsidiaries for the year ended 31 December 2024. The companies included the scope are as follows:

Companies included in the scope of consolidation for reporting in 2024[2]	Owner	% ownership
6&M Producciones y Contenidos Audiovisuales, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Antena 3 Multimedia, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Antena 3 Noticias, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Atres Advertising, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Atresmedia Capital, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Atresmedia Cine, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Atresmedia Música, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Atresmedia Smart Tools, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Atresmedia Studios, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Atresmedia Tech, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Diariomotor Medios Digitales, S.L.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Música Aparte, S.A.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Uniprex, S.A.U.	Atresmedia Corporación de Medios de Comunicación, S.A.	100
Uniprex Televisión Digital Terrestre de Andalucía, S.L.U.	Uniprex, S.A.U.	100

[1] As at the reporting date, the CSRD had yet to be transposed into Spanish law and the period provided for the transposition had elapsed. Therefore, Atresmedia Group's sustainability reporting in accordance with ESRS is voluntary, in line with the recommendations of the Spanish National Securities Market Commission (Comisión Nacional del Mercado de Valores or CNMV) in its notification of 27 November 2024.
[2] Information on Fundación Atresmedia is provided voluntarily in this sustainability statement.

Companies included in the scope of consolidation for reporting in 2024[2]	Owner	% ownership
Uniprex Televisión, S.L.U.	Uniprex, S.A.U.	100
Inversión y Distribución Global de Contenidos, S.L.U.	Uniprex, S.A.U.	100
Antena 3 Televisión Digital Terrestre de Canarias, S.A.U.	Uniprex, S.A.U.	100
Smartclip Hispania, S.L.U.	Atres Advertising, S.L.U.	100
Human to Human Communications, S.L.U.	Atres Advertising, S.L.U.	100
Wayna Aero, S.L.	Atresmedia Capital, S.L.U.	90,35
Pazy Digital Ventures, S.L.	Atresmedia Capital S.L.U.	91,42

Throughout this document, Atresmedia discloses:

- the extent to which its materiality assessment of impacts, risks and opportunities (IROs) extends to its upstream and/or downstream value chain;
- the extent to which its policies, actions and targets extend to its entire value chain; and
- the extent to which it includes value chain data when disclosing on metrics, where required.

When disclosing information on actions related to cybersecurity, Atresmedia has used an option to omit certain information related to intellectual property, know-how and/or results of innovation, given the confidential nature of this information.

Atresmedia cannot use the exception for disclosing information about impending developments or matters in the course of negotiation, as provided in articles 19a(3) and 29a(3) of the Directive.

BP-2 Disclosures in relation to specific circumstances_

Regarding specific disclosures on sustainability, the time horizons used by Atresmedia Group are short-, medium- and long-term as defined in ESRS:

Sources of uncertainty_

The main sources of uncertainty in the calculations made by Atresmedia throughout its value chain are discussed below.

Calculation of the Scope 1 and 2 carbon footprint: Atresmedia's Scope 1 and 2 carbon footprint was calculated in accordance with the GHG Protocol and verified by AENOR in accordance with this standard. The conclusion from the verification is that there is a high level of measurement certainty. Nevertheless, the following main sources of uncertainty were identified.

- Scope 1 emissions with the highest level of uncertainty are from the consumption of natural gas by Smartclip. The data were obtained based on total consumption on the property on which the offices are located and the estimate was made based on the percentage of area occupied. These emissions represent 0.24% of Atresmedia's total Scope 1 and 2 emissions.

- Scope 2 emissions with the highest level of uncertainty are from the consumption of electricity by Onda Cero without renewable Guarantee of Origin (GoO), over which the Group has no control. The breakdown of consumption is obtained starting with the expenditure and based on the average price per kW/h of the reporting year. These emissions represent 6% of Atresmedia Group's total electricity consumption.

Calculation of the Scope 3 carbon footprint: Atresmedia's Scope 3 carbon footprint is calculated by an external provider. Some of the key categories are calculated using secondary data, so they have a higher degree of measurement uncertainty. These categories include emissions from purchased goods and services, capital goods, leased assets, and investments, all calculated using economic values.

Incorporation by reference and information stemming from other legislation_

This Statement includes information by reference to the consolidated financial statements (FS) linked to the following requirements:

- disclosure requirement E1 ESRS 2 IRO-1, the specific datapoint AR 15, regarding the financial implications of climate-related risks.

- disclosure requirement E1-3, the specific datapoint RD 29c, regarding the monetary amounts required to implement the actions in relation to MDR-A and the European Union Taxonomy.

- disclosure requirement E1-6, the specific datapoint RD 55, in relation to net revenue to calculate GHG emissions intensity.

- disclosure requirement S1-4, the specific datapoint RD 37, regarding the monetary amounts required to implement the actions in relation to MDR-A.

- disclosure requirement S1-6, the specific datapoint RD 50f in relation to the number of employees[3].

- disclosure requirement S4-4, the specific datapoint RD 30, regarding the monetary amounts required to implement the actions in relation to MDR-A.

The Company also included information in this Statement from other European Union (EU) regulations (seeList of datapoints in cross-cutting and topical standards that derive from other EU legislation in IRO-2).

Lastly, through the Statement, Atresmedia discloses comparative information for 2023 in accordance with Spanish Law 11/2018 on non-financial and diversity information where required by that law. This Consolidated Non-financial Information and Sustainability Statement forms part of the separate and consolidated Management Reports and is presented as a separate document from the Consolidated Management Report.

[3] Page 66 of the FS. The difference is because the FS do not include employees of Fundación Atresmedia, which are included in this Statement. In addition, the FS include executive directors (3 people) who are excluded from headcount in this Statement.

GOVERNANCE

GOV-1 The role of the administrative, management and supervisory bodies_

Atresmedia system of corporate governance_

Atresmedia Group's corporate governance system and decision-making procedure is rooted in its **Corporate Governance Policy**, as detailed in Chapter G1 Corporate Governance of this Sustainability Statement. Among other things, this policy describes Atresmedia's administrative, management and supervisory bodies and the good practices that should guide their actions.

The administrative, management and supervisory bodies comprise the **General Meeting of Shareholders** and the **Board of Directors** and its committees: the **Executive Committee**, the **Appointments and Remuneration Committee** and the **Audit and Control Committee**. The Audit and Control Committee is supported by two independent collegial bodies: the **Regulatory Compliance Committee (RCN)** and the **Privacy Committee.** Atresmedia's Chief Compliance Officer reports regulatory on issued address at meetings of these two committees to the Audit and Control Committee.

The **General Meeting of Shareholders** is the supreme decision-making body of the Company and the main forum for shareholder participation.

The **Board of Directors** is the highest representative, administrative, supervisory, management and control body of the Company, with the exception of issues that are the exclusive competence of the General Meeting of Shareholders. The Board of Directors is accountable to the General Meeting of Shareholders for fulfilment of its obligations. It must ensure that, in performing its activity and dealing with its stakeholders, the Company:

- respects prevailing legislation at all times,
- acts in accordance with the Corporate By-laws and the internal rules and regulations,
- satisfies its obligations and contracts in good faith,
- respects commonly accepted uses and goods practices in the territories where it operates, and
- applies the principles of social and environmental responsibility it has embraced, endeavouring to reconcile its own corporate interest with the legitimate interests of its employees, suppliers, customers, and other relevant stakeholders, paying attention to the impact it may have on the surrounding environment.

The Board of Directors, with powers to delegate, determines the Group's general policies and strategies and, specifically, its strategic plan, management objectives, annual budget, the Corporate Governance Policy and the Corporate Responsibility Policy.

In performing its duties, the Board of Directors is supported by its three committees and the Group's departments, taking any measures to ensure that the management team, under its supervision, duly implements the Company's overall management strategies.

Oversight is responsibility of the Audit and Control Committee and the Appointments and Remuneration Committee, both composed of a majority of independent directors and with no executive directors. They are supported by Internal Audit and Process Control, in charge of managing the Company's risks; Finance, Corporate General Management the Compliance Officer who, as indicated previously reports to the Board of Directors on the activities of the Regulatory Compliance Committee and the Privacy Committee, as well as all matters related to application of the Compliance and Crime Prevention Model and the Personal Data Privacy Model.

Notably, the Board of Directors protects the interests of all Atresmedia Group employees and the non- employees in its own workforce, as well as of the rest of its stakeholders, as stated in article 7.2 of the Regulations of the Board of Directors, although its members do not include any worker representative.

The **Chief Executive Officer** is the Company's chief management decision maker and is also responsible for implementing the resolutions adopted by the Board of Directors, which it does by delegating functions to the Group's corporate departments and business areas, and subject matter expert committees. These include:

- Television Committee (responsible content, fake news).
- Compliance Officer and Regulatory Compliance Committee (Compliance and Crime Prevention Model).
- Data Protection Officer and Privacy Committee (data protection).
- Security Committee (cybersecurity).
- Advertising Committee (responsible advertising).
- Sustainability Committee, previously called the Corporate Responsibility Committee (diversity, equity and inclusion, and climate change).

Management of material topics and reporting lines to the administrative, management and supervisory bodies_

In line with Atresmedia Group's organisational structure, the topics identified as material are managed by the various corporate departments or specific officers in charge of managing their relevant impacts, risks and opportunities. Examples include:

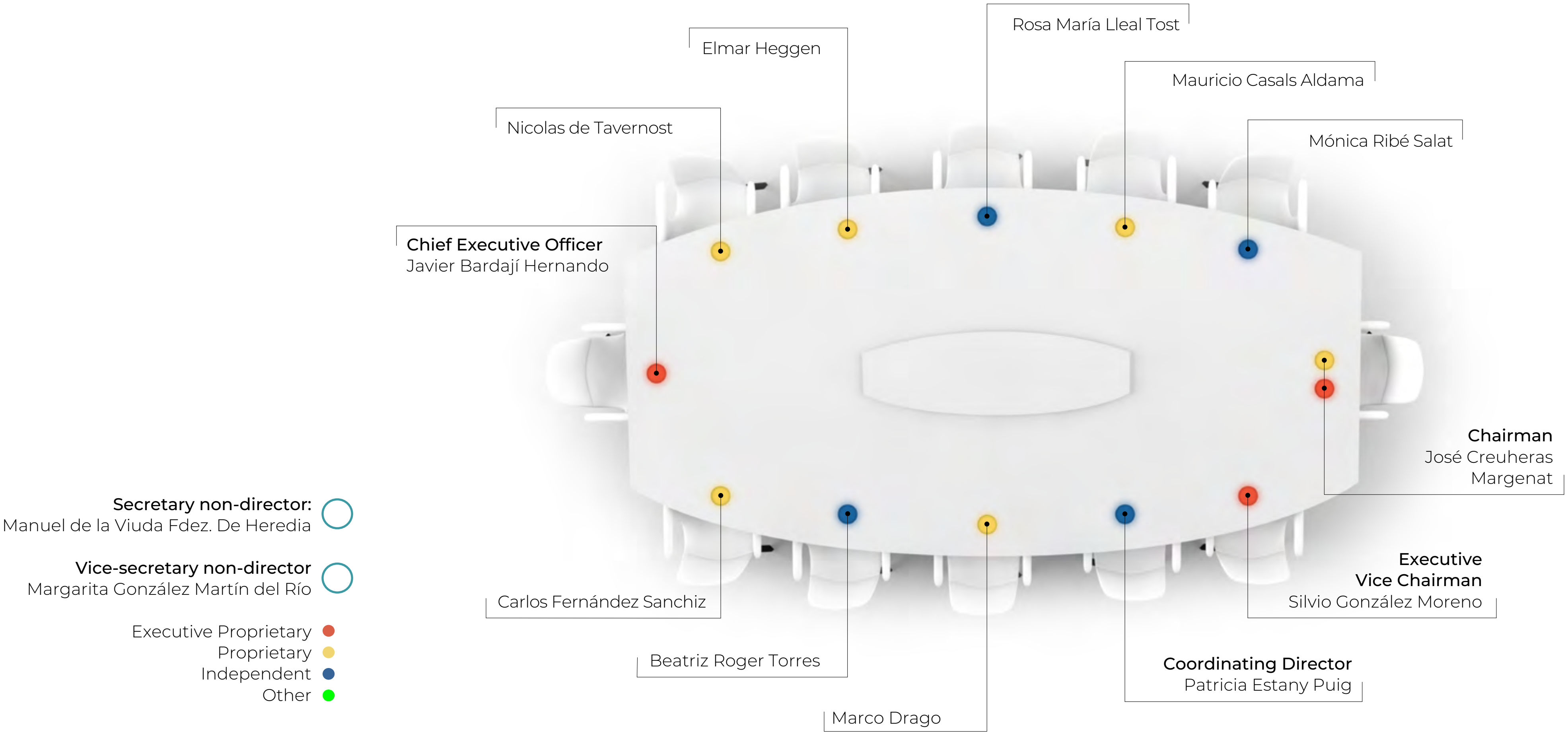
- Corporate General Management, for managing impacts, risks and opportunities (IROs) in relation to human resources, climate strategy, cybersecurity, or diversity, equity and inclusion, among others.
- The Secretary of the Board of Directors, for managing IROs in relation to good corporate governance.
- The Chief Compliance Officer and Head of Legal Affairs, for managing IROs in relation to application of the Compliance and Crime Prevention Model.
- The General Advertising Department, for managing IROs in relation to responsible advertising and the protection of children.

As needed, corporate and business directors attend Board of Directors and Board committee meetings to report on key issues related to their respective areas or activities, including issues related to the material topics identified in the double materiality assessment. The Corporate General Manager is responsible for the Group's sustainability strategy and attends the meetings of the committees she oversees to address the sustainability- related issues under her remit (i.e., human resources, climate strategy, diversity, infrastructure management, or general services). She provides a progress report to the Audit and Control Committee on the Group's sustainability strategy at least annually.

Internal Audit is tasked with managing the sustainability risks identified as material and with defining the specific risk controls. As discussed later, Atresmedia is currently amending its Internal Control over Sustainability Reporting (ICSR) system (until now the ICNFR) and will design specific controls to strengthen and adapt the current Internal Control over Non-Financial Reporting system, aligning them with the new regulatory requirements.

Board and committee composition and selection_

At 31 December 2024, the Board of Directors comprised 12 members, three executive (one proprietary) and nine non-executive. Of the nine non-executive directors, four are independent female directors and five are proprietary directors, with independent directors representing 33% of total seats on the Board. Regarding diversity, there are four female directors, representing over 30% of total Board membership[4].



[4] *Proprietary director Nicolas de Tavernost resigned with effect from 29 January 2025. On that date, the Board appointed David Larramendy as proprietary director through co-option on the nomination by shareholder Ufa Film und Fernseh, Gmbh.*

Diversity in administrative bodies: gender, age and nationality_

In 2024, Atresmedia's Board of Directors was composed of four women (33%) and eight men. The four women are independent directors.

2024	Executive		Proprietary		Independent		Women	
Diversity of gender	Nº	%	Nº	%	Nº	%	Nº	%
Board of Directors	3	25%	5	42%	4	33%	4	33%
Executive Committee	3	50%	2	33%	1	17%	1	17%
Audit and Control Committee	0	0%	2	40%	3	60%	3	60%
Appointments and Remuneration Committee	0	0%	2	40%	3	60%	3	60%

Diversity of age	Nº	%
Under 50	1	8.33%
Between 50 and 60	4	33,.3%
Over 60	7	58.33%
Average age	61.92	

Diversity by nationality	Nº	%
Spanish	9	75%
Foreign	3	25%

Diversity of expertise_

In terms of director expertise, all have solid track records in the media industry and in-depth knowledge of the products, services and regions where the Company operates.

Atresmedia has seven directors with expertise in sustainability matters, including social, environmental and governance (ESG) aspects. Director expertise in ESG, along with the rest of their skills, is presented in the skills matrix. This matrix, along with the Board composition and diversity of skills, as well as type, gender, geographical background and age, are reviewed annually by the Appointments and Remuneration Committee. This analysis considers both the external (Spain's Corporate Enterprises Act and Audit Act) and internal (Corporate By-laws, Regulations of the Board of Directors, and Director Selection and Appointment policy) regulatory framework. In 2024, it also considered Organic Law 2/2024, of 1 August 2024, on equal representation and balanced presence of women and men (the Gender Parity Law). Compliance with this law by Atresmedia Corporación becomes effective 30 June 2027, although it can apply this law before the legal deadline.

Diversity of expertise	Nº of directors
Strategy	11
Business management	9
Sector (media, advertising, etc.)	6
Finance (accounting, auditing, etc.)	8
Risks (financial and non-financial)	8
Sustainability (environment, climate change, social, human resources, remuneration, diversity, talent, social action, corporate governance and compliance)	7
Cybersecurity	2
International experience	4

The **Appointments and Remuneration Committee is responsible for identifying needs in the Board composition** and aligning proposed appointments or re-elections of independent directors to those needs, as well as for reporting to the Board on proprietary and executive director appointments or re-elections.

To this end, the Committee maps the directors' current skills and knowledge, as well as the needs identified, and then incorporates them in the skills matrix, which is regularly updated. This tool is essential for selecting new director candidates and assessing suitability of current board members. Whenever necessary, the Committee may engage independent external advisors for assistance.

The Committee also reports on proposals for the appointment and removal of directors who report directly to the Board of Directors, the Chief Executive Officer or any director with executive duties. The proposals consider especially candidates' expertise and skills for assuming the position. Specifically, positions related to oversight of sustainability issues, as well as the management of material impacts, risks and opportunities, are held by senior executives, who undergo annual performance evaluations.

Lastly, in 2022, a team of external sustainability experts delivered a training course on sustainability to the members of the Audit and Control Committee, which is responsible for this area.

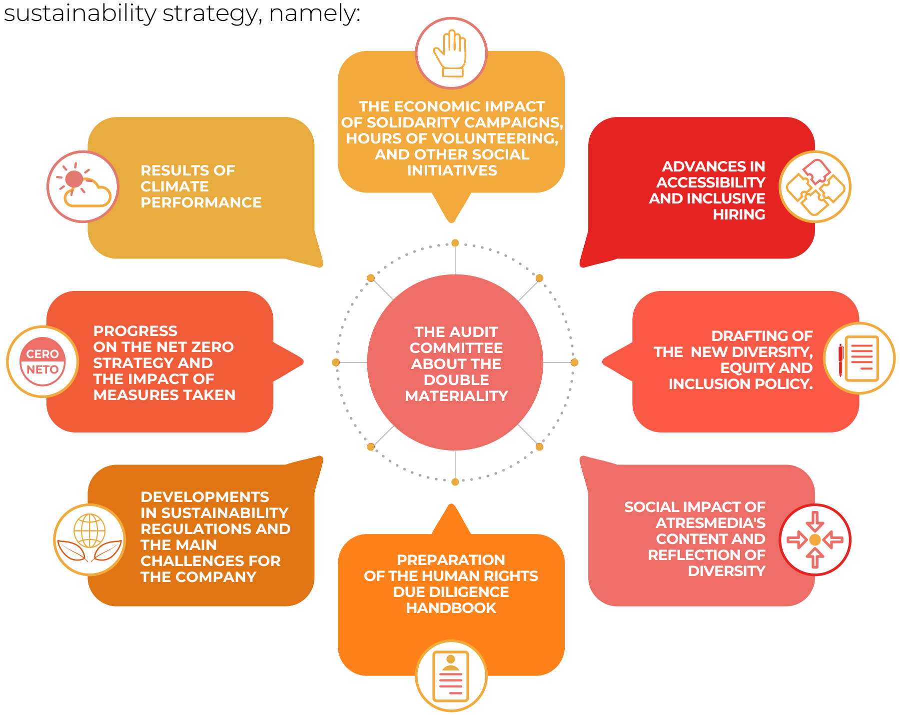
GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies_

Where a matter considered to be material is detected, the Group's various corporate and business areas are responsible for its management. In this process, the material impacts, risks and opportunities related to that matter are identified and presented by the relevant department to the Chief

Executive Officer, directly or through specialised committee meetings. Then, as appropriate, the matter is escalated to the management and supervisory bodies to inform them, propose actions and adopt resolutions to execute those actions, which they will later supervise.

Regarding the sustainability strategy and its key social and environmental impacts, the Corporate Managing Director attends the Audit and Control Committee meeting each year to report on sustainability-related advances and challenges, addressing key issues of the environmental, social and governance dimensions under her management. The committee chair, also in attendance during that presentation, briefs the Board of Directors in a plenary meeting on the issues addressed. All directors receive a copy of the meeting minutes.

In 2024, during her annual report on sustainability issues, the Corporate General Manager informed the Audit Committee about the double materiality assessment process, the key outcomes and other relevant issues of the sustainability strategy, namely:



In addition, the audit firm engaged to assure the 2023 Sustainability Statement (then called the Non-Financial Information Statement) attended the Audit Committee meeting to present the engagement scope and conclusions before approval by the Board of Directors.

Given the cross-cutting nature of the topics identified as material, in addition to the information reported by Corporate General Manager, the administrative bodies receive information on sustainability and other non- financial matters through regular reporting from other officers and committee meetings. For instance, ethics and governance issues are addressed by the Compliance Officer, who reports to the Audit Committee at least three times a year on the activity of the Regulatory Compliance Committee (RCN). Issues include application of the Crime Prevention and Compliance Model, conflicts of interest, whistleblowing and complaint management, in addition to reporting on relevant privacy and cybersecurity-related matters dealt with by the RCN.

Furthermore, the commitments, objectives and lines of action related to material topics are outlined in different corporate policies approved by the administrative, management and supervisory bodies, and are an essential part of business strategy.

General policies, which are approved by the Board of Directors given their content, are disclosed previously by the committees. Occasionally, these policies are developed and complemented by other policies and protocols approved by the Group's managing directors.

Meanwhile, the Chief Sustainability Officer reports regularly on developments in the Group's ESG strategy to the Corporate General Manager who, in turn, reports directly to the CEO on key sustainability matters for the business so he is kept abreast of the main challenges and advances in this field.

Finally, representatives from many areas involved in sustainability matters attend Sustainability Committee meetings. At these, the Chief Sustainability Officer reports on the Group's main advances in the development of the ESG strategy so as to ensure a cross-cutting view of these matters throughout the Company.

GOV-3 Integration of sustainability-related performance in incentive schemes_

Following are disclosures on how sustainability criteria are integrated into the schemes of incentives offered to members of the Group's administrative, management and supervisory bodies[5].

Atresmedia endeavours to align director and executive remuneration with the business strategy, the creation of value for shareholder, and the interests and long-term sustainability of the Company and the consolidated Group. With this purpose in mind, the Director Remuneration Policy for 2024-2026 (available on the corporate website) establishes an appropriate balance between fixed and variable remuneration, promoting long-term sustainability and integrating environmental, social and governance (ESG) objectives.

The current policy includes a multi-year scheme approved by shareholders at the General Meeting in 2021 which runs until 28 April 2025. This scheme contains an objective related to compliance with sustainability targets, which in turn comprise the following four indicators:

- **i** Compliance with, at least 85%, of the recommendations in the Good Governance Code of Listed Companies.
- **ii** Maintenance of a significant reserve of airtime for the broadcasting of free campaigns for NGOs.
- **iii** Maintenance and increase in the percentage of hours of subtitling and close captioning in the television programming grid.
- **iv** Achieving a high score in the Carbon Disclosure Project report.

At the 2024 General Meeting, shareholders approved a modification of the current scheme to include a new multi-year scheme with similar targets to the 2021 scheme, but with an updated climate indicator (CDP score) so it is linked to the Group's decarbonisation strategy. This new indicator is:

> Achievement of 95% renewable electricity consumption by 2026 and above 93% each year until then.

The period for achievement of the sustainability targets is defined by the schemes as 2021-2023 for the 2021 scheme and 2024-2026 for the 2024 scheme. The sustainability target, with its four indicators, has a weighting of 5% of executive directors' total remuneration. Entitlement to this percentage is contingent on meeting at least 50% of the four indicators.

In February each year, the Appointments and Remuneration Committee reviews the indicators linked to executive directors and certain executives based on financial and non-financial information for the year. Before payment of the remuneration, the committee must verify compliance with the established targets, taking as reference the data approved by the Board of Directors and published in reports available at the CNMV and on the corporate website.

[5] *This Disclosure Requirement is consistent with the remuneration report prescribed in articles 9a and 9b of Directive 2007/36/EC on the exercise of certain rights of shareholders in listed companies.*

Monitoring of the sustainability indicators in the 2024-2026 remuneration scheme_

Regarding sustainability-related performance metrics, Atresmedia follows a specific procedure for monitoring the objectives and four indicators:

OBJECTIVE 1 — Compliance with, at least 85%, of the recommendations in the Good Governance Code of Listed Companies.

Performance	Tracking	Outcome
Compliance with, at least, 85% of the 60 recommendations applicable to it.	The Annual Corporate Governance Report (ACGR) includes a section on monitoring by Atresmedia during the reference year of the recommendations in the "Complies" or "Explain" criteria established by the CNMV as the supervisory body of this Statement and application by the issuers of the Good Governance Code (GGC). The Audit and Control Committee reports to the Board of Directors prior to approval of the ACGR.	96.6% (58/60)

OBJECTIVE 2 — Maintenance of a significant reserve of airtime for the broadcasting of free campaigns for NGOs

Performance	Tracking	Outcome
The target associated with performance is related to the number of social campaigns broadcast and their economic value.	Information on these campaigns is included in the Sustainability Statement, approved by the Board of Directors as part of the consolidated management report (public and externally assured). A formal procedure is in place for managing this aid, which outlines the requirements and contains guidelines for computing the campaigns as the grant of advertising spaces. The Sustainability Department manages and monitors these actions, with pre-broadcast control and prior oversight from Legal Affairs and the Advertisin.	40 campaigns EUR 23 M

OBJECTIVE 3 — Maintenance and increase in the percentage of hours of subtitling and close captioning in the television programming grid.

Performance	Tracking	Outcome
Subtitling and closed captioning of at least 92% of content aired on television.	Atresmedia works to maintain and increase the percentage of computable hours of the programming schedule featuring closed captioning and SDH subtitles in accordance with Spain's Audiovisual Media Law. This indicator it monitored using an internal tool, the Broadcasting Register. It provides information on total number of hours subtitled and closed captioned and calculates the percentages out of the 24 hours of eligible programming. The results are reported in the Sustainability Statement.	93.9%

OBJECTIVE 4 — Achievement of 95% renewable electricity consumption by 2026 and above 93% each year until then.

Performance	Tracking	Outcome
Surpass 93% of renewable electricity consumption in 2024 and 2025 and reach 95% in 2026.	Atresmedia measures the organisation's total electricity consumption each year, as well as total share with a renewable energy certificate (GoO). It reports the results in its Sustainability Statement.	93.5%

The Board of Directors has ultimate authority for approving the schemes, based on a report from the Appointments and Remuneration Committee. According to company law in Spain (Article 219 of Royal Legislative Decree 1/2010), remuneration schemes that entail the delivery of shares, share options or payments linked to the share price must be set out in the Corporate By-laws and approved by shareholders at the General Meeting. Additionally, all remuneration policies—share based or not—must be approved every three years at the General Meeting.

GOV-4 Statement on due diligence_

The approach adopted by Atresmedia in relation to the sustainability due diligence process is set out below. The purpose of this ongoing process is to identify, prevent, mitigate, and be accountable for actual and potential negative impacts on the environment and people throughout its value chain.

This framework of action is founded in the UN Guiding Principles on Business and the OECD Guidelines for Multinational Enterprises and serves as a basis for the Group in assessing its sustainability-related impacts, risks and opportunities.

In this context, to uphold the established principles for the due diligence process, the Group took as a starting point the preparation of a double materiality assessment (see section 1.4 Impact, risk and opportunity management) with the aim of identifying the most relevant impacts, risks and opportunities for the Company.

Core elements of due diligence	Sections of the Sustainability Statement
a) Embedding due diligence in governance, strategy and business model.	• ESRS 2 GOV-2 • ESRS 2 GOV-3 • ESRS 2 SBM-3
b) Engaging with affected stakeholders in all key steps of the due diligence.	• ESRS 2 GOV-2 • ESRS 2 SBM-2 • ESRS 2 IRO-1 • ESRS 2 MRD-P • Topical ESRS: reflecting the different stages and purposes of stakeholder engagement throughout the due diligence process.
c) Identifying and assessing adverse impacts.	• ESRS 2 IRO-1 • ESRS 2 SBM-3
d) Taking actions to address those adverse impacts.	• ESRS 2 MDR-A • Topical ESRS: reflecting the range of actions, including transition plans, through which material impacts are addressed.
e) Tracking the effectiveness of these efforts and communicating.	• ESRS 2 MDR-M • ESRS 2 MDR-T • Topical ESRS: regarding metrics and targets

GOV-5 Risk management and internal controls over sustainability reporting_

For Atresmedia Group, as both a media company and a listed company, updating and following the recommendations of regulatory and/or supervisory bodies of its activities is crucial. Atresmedia has an Internal Control over Non-financial Reporting system designed to ensure that its non-financial reporting is compete and reliable.

Considering the recent adoption of the CSRD, the Group spent 2024 immersed in a period of adaptation. It undertook a commitment to transition so it could respond to the new requirements in an orderly and effective fashion.

This commitment translated into planning detailed consultancy work that would enable it to perform an in- depth assessment and analysis of all key aspects of the sustainability reporting process. With this, it could identify potential risks, design and implement specific controls to mitigate their potential materialisation, and establish a robust and effective control system for sustainability reporting. The pproach for the correct implementation of the Internal Control over Sustainability Reporting (ICSR) system entails:

- Identification of the types of risks and environmental, social and governance factors in sustainability reporting which, if they occurred, could have a material negative impact, to ensure suitable integration in the system and compliance with applicable regulations.
- Evaluation of specific sustainability reporting risks using the same approach as for the assessment of other risks: impact, likelihood and criticality.
- Identification and design of mitigation controls, as well as outlining other compensatory measures in place.
- Traceability and control of the model, including it in corporate policies and risk reports.
- Supervision and reporting of results, through the Audit and Control Committee, positioning the model at the same level as the model designed for financial risks.

Moreover, in line with the Company's commitment to the responsible and sustainable management of its business model, Atresmedia kept its ESG risk management model in 2024, framed by the Group's Corporate Risk Management System, which in 2021 was updated to include the categories of environmental, social and governance (ESG) risks.

STRATEGY

SBM-1 Strategy, business model and value chain_

Business model_

Atresmedia, as a leading group within the communication and entertainment sector in Spain and operating in the television, radio, digital, cinema and audiovisual production sectors, is widely known and highly respected for its commitment to viewers, listeners, advertisers, shareholders, employees and other stakeholders. Its main mission is to offer diverse, innovative and genuinely outstanding news and entertainment, tailored to the needs of its audience and society in general, and with the ultimate goal of building trust, achieving leadership and ensuring the Group's sustainability.

Forever true to its corporate purpose and thanks to its content—both news and entertainment—Atresmedia generates knowledge and raises social awareness, thus helping to build a society based on shared values that promote the common good.

In 2024, the Group ended the year with 2,666 employees, all of them located in Spain, and gross revenue of EUR 1,018 million[6].

The Group structures its business model in four main divisions:

- **Atresmedia Audiovisual.** With its six free-to-air television channels: Antena 3, laSexta, Neox, Nova, MEGA and Atreseries; together with its on-demand content platform atresplayer; and film production through Atresmedia Cine and Buendía Estudios.
- **Atresmedia Radio.** It has three main stations: Onda Cero, offering unrivalled news content; and Europa FM and Melodía FM, featuring a superb selection of entertainment and music.
- **Atresmedia Publicidad.** Tasked with the Group's advertising and commercial endeavours, as well as the activities carried out by smartclip and H2H.
- **Atresmedia Diversificación.** Encompasses the activities of other non-advertising businesses through the following business lines: Atresmedia Internacional, Media for Equity, New Businesses and the Music Business, not to mention the activity of companies such as Pazy and Waynabox.

The Group also has various secondary business lines that generate further wealth and value for the Group and society as a whole, such as **Atresmedia Formación.** Through this arm of the business, the Group brings the knowledge of its journalists and communication professionals to bear in training other companies and individuals looking to improve and perfect their communication skills.

Each division pursues its own specific objectives to maximise the Group's outreach, revenue and positive impact, thus ensuring its leadership in the media sector, both in Spain and on the international stage.

ATRESMEDIA AUDIOVISUAL

It is the beating heart of the business and is focused on the creation, production and distribution of high quality news and entertainment content, catering to all audiences. The Group makes this content available to the audience through its linear television channels and its OTT platform, atresplayer, as well as through the film production of Atresmedia Cine and Buendía Estudios, the latter company being 50% owned by the Atresmedia Group.

Its monetisation model brings in revenues from the sale of content rights, international distribution, premium atresplayer subscriptions and digital advertising, relying on cutting-edge technology and innovative content to capture national and international audiences.

Atresmedia Televisión is one of the Atresmedia Group's main lines of activity and sources of revenue. Through its six television channels, it provides the public with a diverse, innovative and quality assortment of news coverage and entertainment, which also provides a safe and attractive environment for the company's main customers: audiences and advertisers. For many

[6] *Atresmedia is not engaged in any activities related to the fossil fuel sector, the production of chemicals, weapons or the cultivation and production of tobacco.*

years, Atresmedia Televisión has been pursuing a socially sustainable television model that promotes a critical spirit, fights disinformation and fake news, gives a voice to minorities and encourages pluralism and diversity. The company is highly adept at creating outstanding, innovative and genuinely interesting content that allows it to reach out to all types of audiences, regardless of the medium or device from which they access the content.

Meanwhile, atresplayer is the leading Spanish OTT platform, offering exclusive entertainment and access to all the content available on the various channels of Atresmedia Televisión.

In its efforts to bring about social change and create a more resilient society, the Group devotes part of its spaces and programmes to issues related to the environment and the fight against climate change. For instance, Antena 3 Noticias has featured a Climate, Society and Culture section since 2023 and laSexta airs climate content as a cross-cutting part of its programming.

This division also includes the film business, led by Atresmedia Cine, the Spanish production company with the highest number of viewers in 2024, and Buendía Estudios.

ATRESMEDIA RADIO

Thanks to the content aired by its three main radio stations, namely Onda Cero, Europa FM and Melodía FM, Atresmedia Radio responds to the concerns and interests of society by offering a range of news and music widely recognised for its reliability, viewpoint diversity and proximity.

This division, which operates under the company name Uniprex, achieves remarkable outreach with its outstanding content. As part of its ongoing commitment to the progress of society, Onda Cero offers a broad range of news coverage, focusing on local news, citizen reflection and the fight against fake news and disinformation. Meanwhile, Europa FM and Melodía FM focus on music content.

Their monetisation model mainly involves obtaining advertising revenues in radio and digital formats, while working to adapt their content to the digital environment in a bid to attract new audiences. As an example of this, **Onda Cero** podcast was launched in 2024 as a new format for broadcasting content in the digital realm with the aim of increasing its audience.

Moreover, under the slogan **'Onda Cero listens to the Climate'**, the channel has embraced the fight against climate change as a core part of its programming, through its Green Light initiative, launched in 2024. Through campaigns, messages, reports and interviews aired on its programmes, Onda Cero aims to get its listeners involved in helping to stop the degradation of our planet.

ATRESMEDIA PUBLICIDAD

Atresmedia Publicidad is the marketing arm of the Group's advertising spaces and its main source of revenue. When running the business, Atresmedia is aware of the power of advertising as a catalyst within society, and is therefore committed to the transformation and sustainability of the advertising industry.

Atresmedia Publicidad works hard to offer its clients— mainly advertisers and agencies—an innovative and efficient service, attractive content to build a connection with, a safe space for their brands, and efficient audience measurement, including the implementation of CPM (cost per million) metrics to measure the impact on television in a similar way to digital media, plus the use of data and analytics to offer more effective and personalised formats.

This division encompasses:

- Traditional advertising models, by selling advertising space on television, radio and digital media.

- Advertising on atresplayer, combining conventional formats with innovative formats such as addressable advertising.

Atresmedia Publicidad also offers its advertisers bespoke solutions through the companies Smartclip and Human to Human (H2H), which provide digital advertising and influencer marketing services respectively.

Last but not least, Atresmedia Publicidad promotes various actions with the aim of championing responsible and sustainable practices among its advertisers. Flagship projects include *Contra el Maltrato Tolerancia Cero* alongside Fundación Mutua Madrileña, or *Constantes y Vitales* and *Ponle Freno* together with Axa (described in more detail in section S4-4 of this Statement). Atresmedia Publicidad also partners up with prestigious brands to stage awareness campaigns targeting a variety of worthy causes, including:

- The bullying awareness campaign alongside the ColaCao Foundation.
- The *La Revolución Senior* study with Shiseido to showcase the value of older women in achieving social progress.
- The *Salud en la Onda* (Health on Air) campaign carried out with Publicis Health Spain to promote good mental health.

ATRESMEDIA DIVERSIFICACIÓN

Atresmedia Diversificación's goal is to find and commit to innovative projects offering high potential and able to make a significant contribution to the Group's earnings, through businesses that do not rely directly on the traditional advertising market.

Its main monetisation model is to generate income by acquiring stakes in start-ups; running television channels outside Spain; undertaking projects that bring the content beyond the screen; and creating musical resources for the various audiovisual productions. All of this while targeting responsible and high quality broadcasting.

This division brings immense strategic value to the Group by diversifying both revenues and investments through its four lines of action:

Atresmedia Internacional:
Its four linear channels (Antena 3, Atrescine, Atreseries and ¡HOLA! TV), three FAST channels (Cine y Series, Única and Zona de Investigación) and the atresplayer platform, are there to make Atresmedia's content transcend national borders to reach the rest of Europe, the United States and Latin America.

New Business and Licensing:
This division seeks to reach agreements for the creation of new products and services focused on entertainment, news and culture that bring in revenue by leveraging the awareness of the Group's various brands and content.

Media For Equity:
Focused on investment in emerging sectors such as the 'silver economy' alongside companies such as Cuideo, Durcal or Saldados. As part of its commitment to sustainability and social responsibility, it has stepped up investments in products and services aimed at senior citizens and vulnerable people.

Music Businesses:
Focused on the music publishing business with the aim of exploiting the Group's audiovisual content. This includes the management of the Atresmúsica record label, which publishes original soundtracks for Atresmedia content.

Strategy_

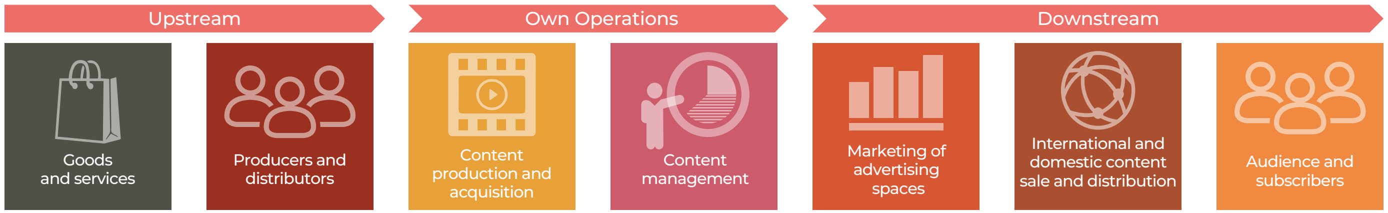
In 2023 the strategic objectives and projects were reviewed in order to accommodate and adjust them to the course of the businesses and the markets and sectors in which the Group operates. All the business areas and many of the Group's employees were involved in this process, and thanks to their hard work we were able to review the main strategic priorities outlined below and which we targeted throughout 2024:

MAXIMISING THE VALUE OF TRADITIONAL BUSINESSES	To optimise and continuously improve linear TV and radio to ensure that they remain relevant to audiences and advertisers alike, with two main objectives: • Optimising available assets and capacities within the Group. • Improving our positioning and profitability in the traditional businesses.
BOOSTING DIGITAL BUSINESSES	Here we focus on distributing more quality content and generating advertising in the digital sphere, targeting both advertising-based digital businesses and subscription-based models. The growth plan envisions the expansion of content distributed through proprietary platforms and technological innovation for greater outreach and revenue generation. We expect to achieve significant growth in existing digital businesses and success in developing new businesses in the coming years.
LEADING THE GENERATION OF AUDIOVISUAL CONTENT	Atresmedia believes that the ability to create outstanding content for all audiences is essential in order to lead the market across all its businesses. Strategies include investing in internal and external skills and talent to create unique content, and forging partnerships and collaborations with independent production companies and social media sites. One of the Group's main priorities is the multi-platform approach, with the aim of connecting with users anywhere and at any time by offering a wide array of multi-channel content across all devices and formats. It is also seeking to adapt the content it generates to traditional, digital and social media channels.
FURTHER DIVERSIFYING THE GROUP	The aim is to broaden revenue diversification beyond traditional advertising by identifying and developing new organic and disruptive businesses, while also expanding internationally as a central growth pillar. The goal is to create a different set of businesses to ensure sustainable and diverse revenue streams, and to consolidate non-advertising dependent revenues.
ACCELERATING THE GROUP'S TRANSFORMATION	The aim is to propel the Group towards greater flexibility and efficiency by embracing technology. This includes implementing transformation projects focused on rapid and deep change, adapting to new industry trends and dynamics, and innovating with artificial intelligence (AI) in content creation processes (text, video and audio) and in transforming and simplifying tasks with AI to generate added value. The expected outcomes include the development and completion of multiple key projects that will have a significant positive impact on the Group's future.

Atresmedia value chain_

Given the nature of its businesses, the Group has identified two distinct value chains, one for its core business (audiovisual content) and one for the diversification business (non-advertising revenues). However, when it comes to identifying impacts, risks and opportunities, the bulk of the analysis concluded that the main IROs could emerge within the core business. Both value chains are split into three main sections: upstream, own operations and downstream, comprising the following activities:

Core business value chain (audiovisual, radio, advertising)



- Upstream: procurement of goods and services and collaboration with production and distribution companies.
- Own operations: the production, purchase and management of content.
- Downstream: the marketing of advertising space, the sale and distribution of domestic and international content, and the transmission of content to audiences and subscribers.

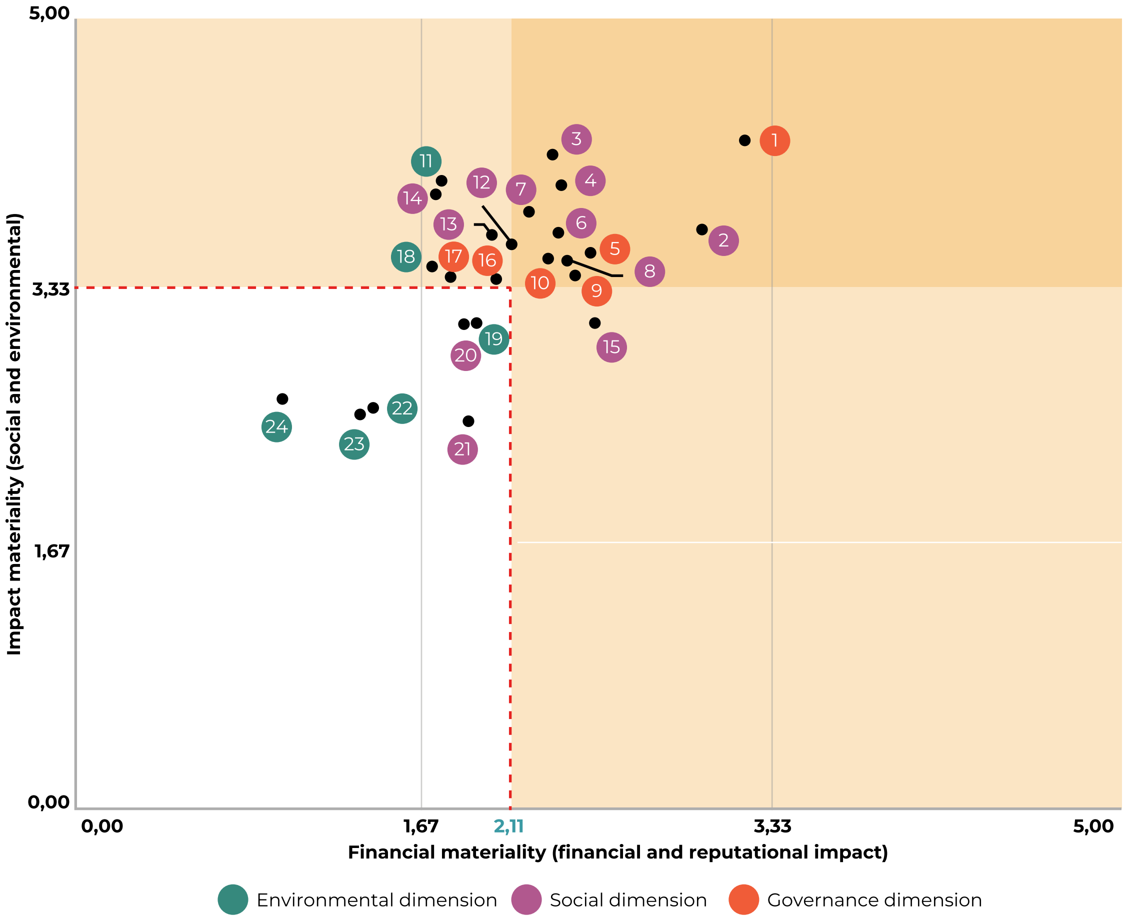
Diversification business value chain:

- Upstream: procurement of goods and services and arranging of professional services.
- Own operations: founding new companies, investing in existing companies, growing new businesses, and selling and distributing content internationally.
- Downstream: the Atresmedia Group.

SBM-2 Interests and views of stakeholders_

In 2023, Atresmedia conducted a double materiality assessment in order to evaluate the environmental, social and governance impacts generated by the Company's activities, and the risks and opportunities that these same factors may carry when it comes to the Group's financial and strategic performance in the short, medium and long term.

The findings of this analysis are shown in the matrix presented below:



	Nº	TOPICS	
CRITICAL	1	Cybersecurity	3,72
	2	Responsible advertising	3,33
	3	Responsible, truthful and quality content	3,22
	4	War against fake news and disinformation	3,13
	5	Regulatory compliance	2,99
HIGH	6	Content accessibility	2,98
	7	Media, information and digital literacy	2,97
	8	Employee health & safety and wellbeing	2,91
	9	Sustainable investment	2,88
	10	Good governance and business ethics	2,87
AVERAGE	11	Sustainable productions	2,86
	12	Engagement with and impact on the community	2,83
	13	Diversity, equity and inclusion	2,81
	14	Loudspeaker for social causes and the climate	2,81
	15	Digital transformation and artificial intelligence	2,78
LOW	16	Data protection and privacy	2,68
	17	Human and labour rights	2,59
	18	Climate change	2,57
NOT MATERIAL	19	Use of resources and the circular economy	2,50
	20	Responsible supply chain	2,46
	21	Workers in the value chain	2,16
	22	Water management	1,98
	23	Biodiversity	1,93
	24	Pollution	1,79

Set out below is information about how Atresmedia factors in the interests and opinions of stakeholders when shaping its strategy and business model. It also describes how the Group endeavours to understand the differing views and perspectives of its stakeholders, and how these perspectives influence the decision-making process. Moreover, in each social standard, the Group reports in further detail on the various channels put in place to collaborate with its own staff, its advertisers and its audiences.

Stakeholder engagement_

Atresmedia appreciates the need for mechanisms to ensure dialogue, transparency and a two-way relationship with stakeholders, due to the importance of listening to the issues and/or concerns raised by them. The Group considers the following as its key stakeholders:

Advertisers and agencies

Audiences

Shareholders and investors

Employees

Suppliers

Regulators

Society

Notably, stakeholder engagement was essential during the double materiality assessment in order to include their expectations and views in the analysis. The ESRS define stakeholders as those who can affect or be affected by the undertaking, differentiating between:

1. affected stakeholders: individuals or groups whose interests are affected or could be affected – positively or negatively – by the undertaking's activities and its direct and indirect business relationships across its value chain ; and

2. users of the sustainability statement: primary users of general-purpose financial reporting (existing and potential investors, lenders and other creditors, including asset managers, credit institutions, insurance undertakings), and other users of sustainability statements, including the undertaking's business partners, trade unions and social partners, civil society and non-governmental organisations, governments, analysts and academics.

Both types of stakeholders were considered and engaged in the assessment carried out. The Group's specific stakeholder groups are shown in the table below, together with the various mechanisms put in place by the Group to engage with its stakeholders:

Stakeholder group	Media	Stakeholder relationship
AFFECTED STAKEHOLDERS		
Suppliers		
Goods and services	• Supplier procurement platform for goods and services. • Direct relationship with the relevant departments (Purchasing, External Production, Own Production).	Management of the relationship with suppliers of goods and services is the responsibility of the Purchasing Department, which ensures compliance with the commitments set out in the Purchasing Policy.
Production companies		The Production Department heads up relations with content production companies.
Distributors		The External Production Department heads up relations with content production companies.
Clients		
Advertisers	• Event (UPFRONT) for the Group's advertisers. • Advertiser's office, customer portal. • Atresmedia Publicidad website. • Social media sites and WhatsApp channel • Direct communication.	The Advertising Department heads up relations with advertisers.
Audience	• atresplayer help center: • Profiles on social media, email support and telephone support. • The speak-up channel is available so that anyone can voice their concerns. • Discussion groups and studies.	Audience relations are managed through various departments, including Radio and Television.
Subscribers		There is a dedicated department tasked with managing relations and providing support to users of the atresplayer platform.
Workforce (own staff)		
Employees	• Corporate Intranet – Atresmil and a3mia • Communications related to Atresmedia's corporate responsibility initiatives in which employees can get involved. • Area mailboxes (HR or Sustainability) • MASDIII internal magazine, where the Group's main news are published. • Programme 3.0 training. • Onboarding process • Works Committees.	Employee relations are largely managed by Human Resources and ORP, which operate under Corporate General Management.
Non-employees		Relations with non-employees are overseen by Occupational Health and Safety and Medical Services and by the various areas in charge of arranging the services.

Stakeholder group	Media	Stakeholder relationship
AFFECTED STAKEHOLDERS AND USERS OF THE STATEMENT		
Society		
NGO	• Press conferences, press releases and website section: https://www.atresmedia.com/prensa/ • Sustainability website: https://www.atresmediacorporacion.com/sostenibilidad/ • Websites of the Group's various divisions and business units. • Atresmedia's own channels (television, radio and digital). • Whistleblowing channel and email inboxes. • Participation in specific clusters and working groups. (Forética, RMF) • Free advertising space to showcase the valuable work of social entities.	Atresmedia interacts with NGOs through different initiatives and in various ways, such as granting them free advertising space, or forging agreements with organisations such as Manos Unidas or UNICEF, which are headed up by the Sustainability Department.
Associations and working groups		Atresmedia has dealings with numerous associations through active participation in their forums and activities, including AUTOCONTROL, Fonética or the RMF.
Vulnerable and minority groups		Atresmedia supports these segments by signing agreements with different entities that work to ensure their inclusion. These efforts are managed jointly by Sustainability and Human Resources, both of which operate under Corporate General Management.
Local communities		The main conduit steering relations with the community is our corporate volunteering programme. Here, we sign partnership agreements with foundations and associations, headed up by the Sustainability department.
USERS OF THE STATEMENT		
Shareholders		
Planeta DeAgostini Group	• Corporate presentations, events. • Direct communication via the Investor Relations area. • Corporate website, shareholder's office	Shareholder relations are mainly handled by Legal Services.
RTL Group		
Non-controlling shareholders		-
Investors		
Potential investors	• Corporate presentations, events. • Direct communication via the Investor Relations area. • Investor Day • Corporate website – investors' office	Investor relations is the purview of the Investor Relations department, which operates under the larger Finance division.
Regulators		
CNMV (Spanish National Securities Market Commission)	• Communications via email or the CNMV/CNMC portal. • Involvement in the Issuers Group.	Relations with the CNMV mainly take place through the exchange of information, though also through the Group's involvement in the Issuers Group.
CNMC (Spanish National Markets and Competition Commission)		The CNMC has an important relationship with the business community through its work on matters of competition regulation, sectoral regulation, supervision of tariffs and conditions, control of business mergers and consumer protection.
Workforce		
Works Committees.	• Regular meetings	Relations with employee representatives take place mainly through HR, which operates under Corporate General Management.

Stakeholder engagement plan_

Before carrying out its double materiality assessment, the Atresmedia Group drew up a **stakeholder engagement plan** in a bid to ensure that all stakeholders were represented and that their input helped to identify the most material topics for the Group. This plan had three main phases:

1. **IRO identification phase.** This phase involved senior and middle managers from all the Group's strategic areas, with the aim of achieving an overview of the entire business (strategy, production, general services, corporate social marketing, finance, consultancy, human resources, diversification, etc.). Thanks to their hard work, Atresmedia identified and validated a preliminary list of impacts, risks and opportunities to be examined during the second phase. Each manager helped to identify the IROs associated with their activity within the Group.

2. **IRO assessment phase.** This phase involved the participation of all stakeholders, both internal and external to the Atresmedia Group. A total of 56 people took part in the process, which is divided into two subphases: internal assessment and external assessment.

   Internal assessment: This process involved:

   - **Atresmedia directors and middle managers,** who identified the initial IROs by completing questionnaires and interviews to gauge the materiality of all impacts, risks and opportunities relating to their work and activities within the Group. A total of 28 responses were collected during this process.

   - **The Internal Audit department,** which is responsible for the Company's risk management, together with the finance department, assessed all the risks and opportunities identified during the previous identification phase.

   - **The Group's employees** from various departments of Atresmedia (Finance, General Services, Programming, Strategy, HR, Marketing, Fundación Atresmedia, Antena 3 and laSexta News, Advertising, External Production, Onda Cero and Diversification) took part in two workshops, where they assessed all the impacts previously identified.

     A total of 13 employees were involved in this process, in which a broad representation of the Group's employees was sought.

   External assessment: through interviews and questionnaires, Atresmedia involved its external stakeholders in the IRO evaluation process. Looking at their relationship with Atresmedia and their role in society, a distinction was drawn between impact assessors and risk and opportunity assessors, as follows:

   - **Impact assessors:** representatives of our suppliers of goods and services, of the production and distribution companies with which Atresmedia works, of its advertisers and agencies, of the audience and of society in general, assessed all the impacts identified. A total of 12 responses were received during this process.

   - **Risk and opportunity assessors:** shareholder and investor representatives assessed all the previously identified risks and opportunities. A total of three people were involved in this process.

Stakeholder group	Nº of participants	Assessment
Internal		
Representatives of the strategic areas	28	IROs specific to their area of expertise
Internal Audit and Finance		All risks and opportunities
Workforce	13	All impacts
External[7]		
Shareholders	1	All risks and opportunities
Investors	2	All risks and opportunities
Suppliers of goods and services	3	All impacts
Production companies	1	All impacts
Distributors	1	All impacts
Advertisers and/or advertising agencies	1	All impacts
Audience representatives[8]	2	All impacts
Representatives of society	4	All impacts

3. **Determination phase:** in this phase all responses from the previous phase were consolidated by applying the parameters described in this Statement (see section ESRS 2 IRO-1). This revealed the most material topics for the Atresmedia Group, from both an impact and a financial perspective (risks and opportunities). This identification of material topics was also made possible by linking all the impacts, risks and opportunities identified and assessed to the Atresmedia Group's own topics. The results were then reflected in the materiality matrix.

Understanding stakeholder priorities_

Thanks to the double materiality process, Atresmedia can gain a better understanding of the interests, concerns and opinions of its stakeholders, while also gauging their views of its business model. Moreover, the methodology used for the assessment process, segmented by stakeholder groups, affords Atresmedia a targeted view of the most material topics for each of the stakeholders, as well as an overview of the most material topics for all of them. This particular aspect, together with the Company's own internal vision, was used to identify the most material topics for the Atresmedia Group.

This process, along with other methods and actions that the Group relies on to collaborate specifically with different stakeholders and which are described in this Statement, allow Atresmedia to respond to the suggestions, concerns and proposals raised by its stakeholders.

Considering the views of stakeholders_

Having identified the most material topics for Atresmedia, and the impacts, risks and opportunities associated with each of them, the Group then analysed how it responds to each of the topics raised, and how it willcontinue to work to cover those topics which are not fully covered through its policies, commitments, actions and objectives.

This commitment stems from the importance that the Atresmedia Group attaches to considering the interests, opinions and concerns of its stakeholders and understanding how they can influence its strategy and business model.

The actions described in this Statement aim to satisfy the needs and concerns of Atresmedia's stakeholders, especially its employees (ESRS S1), and its advertisers and audiences (ESRS S4), while also generating value

[7] *No regulators were involved, due to their status as a public body.*
[8] *Audience representatives such as associations and representatives of society such as associations, NGOs and foundations representing local communities.*

for shareholders and wealth for the Group and society as a whole. Through its policies, mechanisms and actions, the Group seeks to generate positive impacts on society and the environment, mitigate possible negative impacts that may arise from its activity, minimise the emergence of any risks that could affect its business and seize any opportunities that may arise.

Thanks to this regular process and the other collaboration processes carried out with stakeholders, the Group is able to effectively listen to their needs and, as the case may be, make them part of Atresmedia's strategy.

Reporting process to the administrative, management and supervisory bodies_

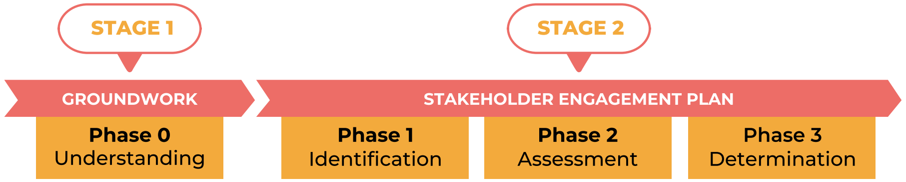
As mentioned earlier, various corporate divisions of Atresmedia submit to the administrative, management and supervisory bodies any material topics that they believe may affect the strategy and business model, including aspects related to sustainability. In 2024, the Corporate General Manager delivered a presentation to the Audit and Control Committee on the process followed when conducting the Group's first double materiality assessment. She also described the main material topics related to the impacts, risks and opportunities addressed during the analysis, as gleaned from the feedback received from the various stakeholders involved.

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model_

Atresmedia seeks to provide a clear and structured view of the material impacts, risks and opportunities identified in its double materiality assessment and show how these affect its strategy and business model.

To gain a proper understanding of those topics considered in the double materiality assessment, prior to the stakeholder engagement plan described in the previous section (SBM- 2), the Group conducted a process to understand the business, its stakeholders and its value chain. The findings served as the inputs for the subsequent identification, assessment and determination of IROs and material topics.

Thus, the complete materiality assessment process was divided into four main stages:



During the identification phase, as mentioned above, Atresmedia linked the impacts, risks and opportunities to be assessed to a series of concrete topics defined by looking at the unique features of the media sector with the aim of reflecting the specific characteristics of its business.

These topics were selected in view of the following aspects:

- Atresmedia's own knowledge of its business model and the environment in which it operates.
- The materiality assessments carried out by the Group in previous years, which revealed the significance of certain topics intrinsic to a media outlet.
- The inputs received by taking part in working groups specialized in media and sustainability on the international scene, such as the Responsible Media Forum. This includes its reports, such as the Media Materiality Report 2022.

To meet ESRS requirements (specifically ESRS 1 AR 16), Atresmedia mapped these topics to the topics, sub- topics and sub-sub-topics set out in the standard, thus ensuring absolute correlation between them and so that all the IROs identified would be covered by the ESRS. More precisely, Atresmedia's own topics were linked to nine of the ten topical ESRS, excluding ESRS S3 — Affected communities, from the process. This, together with a series of sub-sub-topics of other ESRS were excluded from the assessment because they were not directly linked to Atresmedia's business or its value chain (see section IRO-2 for more information).

The following table sets out the relationship between Atresmedia's own topics, reflected in the double materiality matrix, and the topics and sub-sub-topics included in AR16:

Atresmedia topics	Associated ESRS topic	Associated ESRS sub-sub-topic
6 Content accessibility	S4 Consumers and end-users	S4 Non-discrimination
		S4 Access to (quality) information
7 Media, information and digital literacy	S4 Consumers and end-users	S4 Access to (quality) information
14 Mouthpiece for social causes and the climate	S4 Consumers and end-users	S4 Non-discrimination
		S4 Responsible marketing practices
		S4 Access to (quality) information
8 Employee health & safety and wellbeing	S1 Own workforce	S1 Work-life balance
		S1 Health and safety
		S1 Secure employment
		S1 Social dialogue, collective bargaining and freedom of association
		S1 Diversity
		S1 Adequate wages
		S1 Training and development
23 Biodiversity	E4 Biodiversity and ecosystems	E4 Other
9 Good governance and business ethics	G1 Business conduct	G1 Corporate culture
		G1 Protection of whistle-blowers
		G1 Prevention and detection including training
		G1 Management of relationships with suppliers
		G1 Policy Commitment
	S4 Consumers and end-users	S4 Freedom of expression
20 Responsible supply chain	E1 Climate change	E1 Energy
	E5 Resource use and circular economy	E5 Resource inflows
	G1 Business conduct	G1 Management of relationships with suppliers
18 Climate change	E1 Climate change	E1 Climate change adaptation
		E1 Climate change mitigation
		E1 Energy
1 Cybersecurity	S1 Own workforce	S1 Privacy
		S1 Training and development
	S4 Consumers and end-users	S4 Privacy
	G1 Business conduct	G1 Corporate culture
24 Pollution	E2 Pollution	E2 Pollution of air
		E2 Pollution of water
		E2 Substances of concern
3 Responsible, truthful and quality content	S4 Consumers and end-users	S4 Access to (quality) information
		S4 Freedom of expression
		S4 Responsible marketing practices
		S4 Health and safety
5 Regulatory compliance	G1 Business conduct	G1 Corporate culture
	S4 Consumers and end-users	S4 Health and safety

Atresmedia topics	Associated ESRS topic	Associated ESRS sub-sub-topic
17 Human and labour rights	S1 Own workforce	S1 all topics[9]
	S2 Workers in the value chain	S4 Responsible marketing practices[10]
	S4 Consumers and end-users	S4 Freedom of expression
		S4 Libertad de expresión
	G1 Business conduct	G1 Corporate culture
		G1 Protection of whistle-blowers
		G1 Policy Commitment
13 Diversity, equity and inclusion	S1 Own workforce	S1 Diversity
		S1 Measures against violence and harassment
		S1 Employment and inclusion of persons with disabilities
		S1 Gender equality and equal pay
	S4 Consumers and end-users	S4 Non-discrimination
22 Water management	E3 Water and marine resources	E3 Water consumption
		E3 Water discharges
10 Sustainable investment	G1 Business conduct	G1 Corporate culture
4 Fighting fake news and disinformation	S4 Consumers and end-users	S4 Access to (quality) information
		S4 Freedom of expression
11 Sustainable productions	E1 Climate change	E1 Climate change mitigation
16 Data protection and privacy	S1 Own workforce	S1 Training and development
	S4 Consumers and end-users	S4 Privacy
2 Responsible advertising	S4 Consumers and end-users	S4 Responsible marketing practices
		S4 Health and safety
		S4 Access to (quality) information
12 Engagement with and impact on the community	S4 Consumers and end-users	S4 Protection of children
		S4 Non-discrimination
		S4 Responsible marketing practices
		S4 Access to (quality) information
		S4 Non-discrimination
		S4 Health and safety
		S4 Access to products and services
	S1 Own workforce	S1 Employment and inclusion of persons with disabilities
		S1 Training and development
	S2 Workers in the value chain	S2 Employment and inclusion of persons with disabilities
21 Hourly employees	S1 Own workforce	S1 Secure employment
		S1 Health and safety
15 Digital transformation and artificial intelligence	S4 Consumers and end-users	S4 Access to products and services
		S4 Access to (quality) information
		S4 Privacy
19 Resource use and circular economy	E5 Resource use and circular economy	E5 Resource inflows
		E5 Resource outflows
		E5 Waste

[9] *"S1 all topics" covers all the sub-topics and sub-sub-topics of ESRS S1 Own workforce (working conditions, equal treatment and opportunities for all, and other work-related rights, including all the related sub-sub-topics).*
[10] *"S2 all topics" covers all the sub-topics and sub-sub-topics of ESRS S2 Workers in the value chain (working conditions, equal treatment and opportunities for all, and other work-related rights, including all the related sub-sub-topics).*

Results of the identification phase: a total of 252 IROs (129 impacts, 38 opportunities and 85 risks) were detected during the identification phase that could have a direct or indirect influence on the Group's operations and several stages of its value chain and that will be assessed subsequently by stakeholders.

Results from the assessment and determination phase: as a result of the assessment, Atresmedia determined that 18 of its own topics were material as they exceeded the defined threshold (see Disclosure Requirement IRO-1 for more information on the criteria used). These topics were considered material from an impact perspective, a financial perspective, or both. This dual approach ensures that the topics were not only significant for stakeholders, but also essential for the organisation's financial performance and long-term sustainability. T**ranslated to ESRS, this meant that 6 of the 10 ESRS topics were material for Atresmedia Group**. In addition, during this step a total of 218 material IROs were identified; i.e., 104 impacts, 35 opportunities and 79 risks.

Following are the ESRS topics related to the preliminary list of identified impacts, risks and opportunities, with the material topics colour coded in orange and identified with (M).

Topic	Sub-topic	Sub-topic
E1 Climate change (M)	· Climate change adaptation (M) · Climate change mitigation (M) · Energy (M)	
E2 Pollution	· Pollution of air · Pollution of water · Substances of concern	
E3 Water and marine resources	· Water	· Water consumption · Water discharges
E4 Biodiversity and ecosystems	· Direct impact drivers of biodiversity loss	· Other
E5 Resource use and circular economy	· Resources inflows, including resource use · Resource outflows related to products and services · Waste	
S1 Own workforce (M)	· Working conditions (M) · Equal treatment and opportunities for all (M) · Other work-related rights (M)	· All sub-sub-topics
S2 Workers in the value chain (M)	· Working conditions (M) · Equal treatment and opportunities for all (M) · Other work-related rights (M)	· All sub-sub-topics
S4 Consumers and end-users (M)	· Information-related impacts for consumers and/or end-users (M)	· Privacy, freedom of expression, access to (quality) information
	· Personal safety of consumers and/or end-users (M)	· Health and safety, protection of children
	· Social inclusion of consumers and/or end-users (M)	· Non-discrimination, access to products and services, responsible marketing practices
G1 Business conduct (M)	· Corporate culture (M) · Protection of whistle-blowers (M) · Political engagement and lobbying activities (M) · Management of relationships with suppliers including payment practices (M) · Bribery and corruption (M)	· Prevention and detection including training

ESRS E2 (Pollution), E3 (Water and marine resources), E4 (Biodiversity and ecosystems) and E5 (Resource use and circular economy) topics were not considered material, since the associated impacts, risks and opportunities did not exceed the materiality threshold.

The material impacts, risks and opportunities were represented in the previous matrix, which featured two main axes: the X-axis, representing financial materiality, and the Y-axis, representing impact materiality. This matrix shows all the topics identified and assessed, both material and non-material, thus reflecting one of the Group's core values: transparency.

The topics were also classified according to their environmental, social and governance focus. Finally, material topics were sorted into four categories according to their degree of importance: critical, high, medium and low.

For material impacts, risks and opportunities, the Group's disclosures consist of descriptive information of each related ESRS topic, taking into consideration the following:

- a brief description of the material impacts, risks and opportunities resulting from the assessment and where they are in its value chain;
- the time horizons;
- regarding impacts, how the actual negative and positive impacts (or, in the case of potential impacts, how they are expected to) affect people or the environment, and whether the Group is involved with the material impacts through its activities or because of its business relationships, describing the nature of the activities or business relationships concerned.

Notably, all the impacts, risks and opportunities arise from or are related to Atresmedia Group's strategy and business model, since understanding the Company and its sector was the key foundation of the analysis.

Atresmedia Group has not identified any additional significant financial effects other than those identified by the Group prior to conducting the double materiality assessment. Nevertheless, it includes sustainability risks in its corporate risk map to track their development.

The areas that deal with issues that are critical for Atresmedia's activity and significant for the Group's strategic plan have analysis tools for determining the scope of the risks (impact and likelihood). These tools enable them to protect themselves from the occurrence of these risks, conducting tests and risks assessments with the aim of preventing possible impacts that threaten the achievement of the Group's strategic objectives.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

Disclosures on the materiality assessment process_

IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities_

Atresmedia considered the provisions of ESRS and adopted a structure approach in the phases described above to determine key aspects from the double materiality perspective.

a) Understanding phase

The understanding phase focused on comprehensively understanding the Group's business and operations. It several processes:

- **Analysis of the business model:** first, a detailed analysis of Atresmedia's business model was performed to gain an understanding of the various existing business lines and the specific activity carried out by each, and how the Group generates value. This required a comprehensive analysis of several of Atresmedia's key documents and interviews with the Group's strategic areas.

- **Understanding the value chain:** Second was to understand the Group's value chain. This is defined as the set of activities, resources and relationships related to the Company's business model and the external environment in which it operates. Participants in upstream activities (e.g., suppliers of goods or content) provide products or services that the Group uses to carry out its core business. Meanwhile, participants in downstream activities (e.g., customers) are recipients of the products or services Atresmedia offers and include both consumers of content and users of advertising space. The process for understanding the business provided insight into the objectives and functioning of the four business lines: audiovisual, radio, advertising, and diversification. This analysis allowed the Group to categorise its operations into two main blocks: first, content-related activities, which include the audiovisual, radio and advertising lines that make up the core business; and second, diversification activities, which comprise all activities that are not dependent on content creation. Given the differences between the Group's core business (the main revenue producers) and the diversification business, both value chains were detailed since the IROs identified could differ depending on the type of business.

- **Identifying stakeholders:** In the understanding phase, special emphasis was placed on identifying key stakeholders, recognising all parties that influence or are influenced by the Group's activities, from suppliers and regulators, to customers and associations.

- **Working session with strategic areas:** A task force made up of representatives of the Group's strategic areas was set up to conclude the understanding phase and start the identification phase of IROs. The first working session included a brainstorming session. The objective was to understand the key sustainability topics for the Group, including aspects such as environmental, social and governance (ESG) impacts, as well as sector-specific topics, such as accessibility of content, responsible advertising, or the fight against fake news and disinformation.

This analysis provided insight into Atresmedia's priorities and helped to guide future strategies, ensuring that the Group not only responded to its immediate needs, but that it was also aligned with key long-term industry trends and challenges.

b) Identification phase

The identification phase focused on determining the impacts (impact materiality) that Atresmedia generates on the environment and society throughout its value chain, as well as the risks and opportunities (financial materiality) that may affect the Group's performance arising from the material sector-related topics identified during the previous phase. This phase entailed two processes: preliminary analysis and cooperation with areas;

Preliminary analysis process: First, an inquiry and analysis process was carried out to identify impacts, risks and opportunities. The process included the following steps:

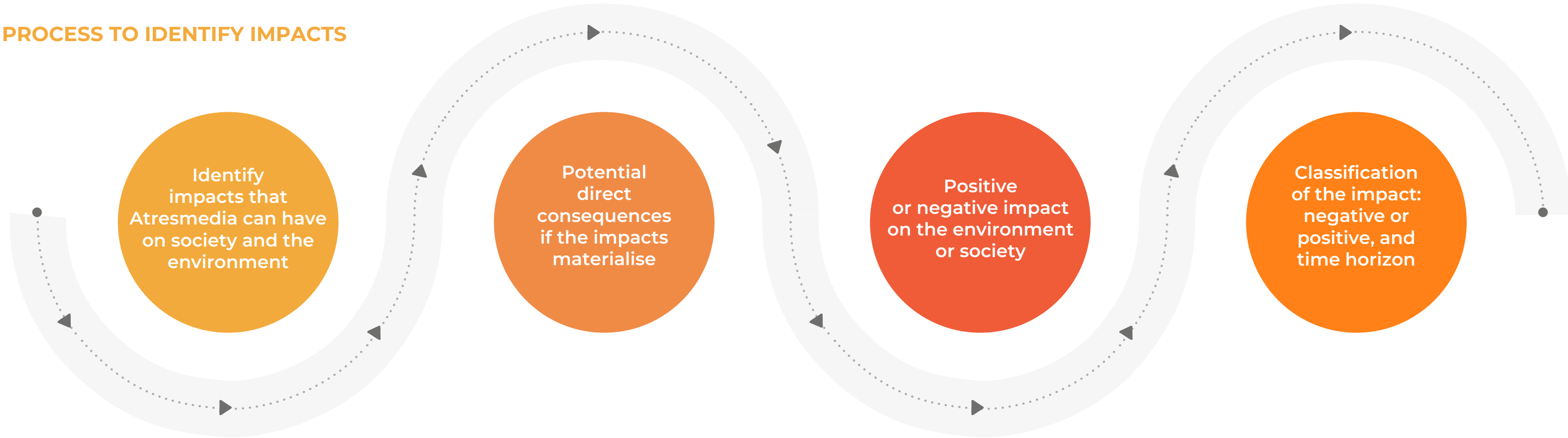
- Understanding the Group and its operations: understanding the Group and its entire value chain enabled the identification of different IROs related to upstream, own operations and downstream activities.
- Sector analysis: through the *Media Materiality Report 2022* issued by Responsible Media Forum, as well as other key documents on the Media & Entertainment sector. This enabled the identification of different sector-level IROs for those Group business lines (audiovisual, radio, advertising, and diversification).
- Analysis of internal sourses: through a variety of sources at the Group (e.g., the 2022 Non-financial Information Statement, codes of ethics, corporate policies, previous materiality assessments), different IROs related to the Group's activity were identified.
- Analysis of external sources: through a variety of external sources—GRI guidelines media sector supplement, Sustainability Accounting Standards Board (SASB), World Business Council for Sustainable Development (WBSCSD), World Economic Forum (WEF), Spain Audiovisual Hub, sector laws—different IROs related to the Group's activity were identified.
- Benchmark: through an analysis of publicly available information from Atresmedia peer companies, different IROs applicable to the Group's activity were identified.
- Sustainability indices: the response to the different sustainability indices in which Atresmedia was a constituent (MSCI, CDP, S&P) was used as input to identify IROs related to different sustainability topics.
- Corporate risk map: sustainability issues included in the corporate risk map were used as input to identify risks in the context of double materiality.

After the analysis carried out to identify IROs, they were classified as follows:

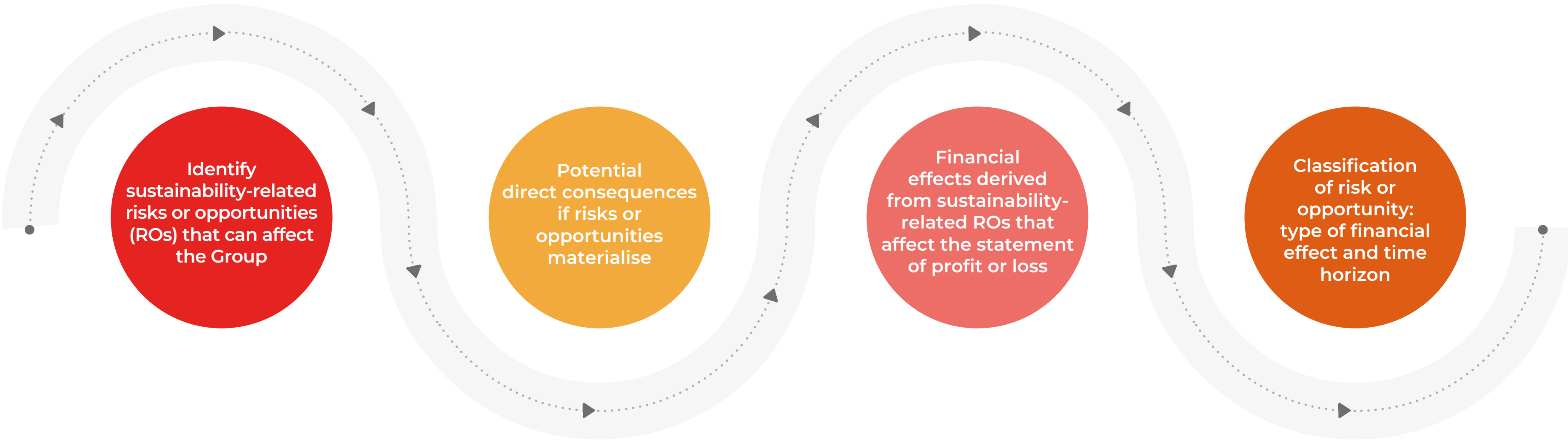
Classification of impacts, risks, opportunities	
Level in the value chain	Upstream, own operations, downstream
Business lines	Corporation, audiovisual, radio, advertising, diversification.
Activities of the business lines	Goods and services, content production and procurement, new businesses, etc.
Specific activities	Production, taping, content broadcasting, audience measurement, etc.
Context	Contextual information for understanding the IROs
Description of IROs	Description of the impact, risk or opportunity
Classification of impacts	
Type	Positive or negative
Likelihood	Actual or potential
Relationship of the impact	Impacts generated directly (own content) Impacts to which the Group contributed (collaborations with third parties) Impacts linked to the Group's operations (value chain)
Time horizons	Short-term: <1 year Medium-term: 1-5 years Long-term: > 5 years
Classification of risks and opportunities	
Type	Risk or opportunity
Likelihood	Potential
Type of financial effect	Business performance (development, performance, position, financial performance) Financial position (assets, liabilities, equity) Cash flows (revenue, expenses) Cost of capital or access to finance
Time horizons	Short-term: <1 year Medium-term: 1-5 years Long-term: > 5 years

The following flowcharts illustrate the approach used, with the first showing the methodology for identifying impacts and the second the methodology for identifying risks and opportunities:

PROCESS TO IDENTIFY IMPACTS



PROCESS TO IDENTIFY RISKS AND OPPORTUNITIES



First, Atresmedia identified the positive and negative impacts of its activities. After obtaining a comprehensive list, it assessed the direct risks and opportunities of the identified impacts, where relevant.

Process to collaborate with strategic areas: as noted previously, internal Group experts from different strategic areas (28 areas, also referred to as workforce representatives) were assigned to each topic considered to validate the initial list and detect possible additional IROs. Once all the impacts, risks and opportunities were classified, they were linked by sustainability-related and media sector-specific topics.

c) Assessment phase

The purpose of the assessment phase was to assess the impacts, risks and opportunities and define the material topics. In carrying out this assessment, the assessment scales in the Group's corporate risk map were considered to align the materiality assessment with both the internal risk assessment processes and the assessment process suggested by ESRS.

Impact assessment

The assessment of impacts considered four variables: scale, scope, and irremediable character, which make up the concept of severity, and likelihood:

- Scale can be defined as the size of the impact for the environment or society. It is measured on a scale of 1 to 5, with 1 being insignificant impact and 5 being extremely relevant impact.
- Scope can be defined as the extension or repercussion of the negative or positive impacts. In the case of environmental impacts, the scope may be understood as the extent of environmental damage or a geographical perimeter. In the case of impacts on society, the scope may be understood as the number of people positively or adversely affected. Scope is measured on a scale of 1 to 5, with 1 being minimal scope and 5 being global scope (Atresmedia company or audience).
- Irremediable character can be defined as the ease or difficulty with which a negative impact could be remediated; i.e., restoring the environment or affected people to their prior state. Irremediable character is measured on a scale of 1 to 5, with 1 being minimal or no need for remediation measures and 5 being maximum difficulty in remediation.
- Likelihood can be defined as the likelihood of the impact materialising or not. It is measured on a scale of 1 to 5, with 1 being unlikely and 5 being certain.

Assessment of risks and opportunities

The assessment of risks and opportunities considered only two variables: financial effect and likelihood:

- Financial effects can be defined as effects arising from environmental, social or governance matters that may negatively (risk) or positively (opportunity) affect the undertaking's financial position, financial performance, cash flows, access to finance or cost of capital in the short, medium or long term.
- Likelihood can be defined as the likelihood of the risk or opportunity materialising or not. It is measured on a scale of 1 to 5, with 1 being unlikely and 5 being certain.

Sustainability risks are managed and assessed at the same level and using the same approach and metrics as the rest of the identified risks in the corporate risk map. They are included in the corporate risk management system and the system of controls to prevent their materialisation when they reach a significant level. Atresmedia will continue to update the corporate risk management system in 2025 to address emerging needs.

Graphical representation of assessment scales_

The assessment of impacts varies depending on whether they are positive or negative, actual or potential, as illustrated in the following chart:

Severity			Likelihood
Positive and negative impacts		Negative impacts	Potential impacts
Scale of the impact	Scope of the impact	Irremediable character of the impact	Possibility of occurrence
Significant impact on the environment and/or society	Minimal impact on the environment and/or society	No corrective measures required to restore the situation to its prior state	Unlikely that the impact will materialise
Minor impact on the environment and/or society	Limited impact on the environment and/or society	Easy to restore the situation to its prior state	Unlikely the impact will materialise
Moderate impact on the environment and/or society	Medium impact on the environment and/or society	Not easy to restore the situation to its prior state	Likely the impact will materialise
Relevant impact on the environment and/or society	Widespread impact on the environment and/or society	Difficult to restore the situation to its prior state	Highly likely the impact will materialise
Extremely relevant impact on the environment and/or society	Global impact on the environment and/or society	Extremely difficult or impossible to restore the situation to its prior state	Certain that the impact will materialise

By contrast, risks and opportunities are assessed using two variables: financial effect and likelihood, represented as follows:

Financial effect		Likelihood
Risks and opportunities		Potential R&O
Potential scale of the financial effect		Possibility of occurrence
< EUR 3.5 million	The risk or opportunity does not generate any significant financial effect.	The risk or opportunity is unlikely to materialise.
EUR 3.5-5.25 million	The financial effect is low.	The risk or opportunity is likely to materialise.
EUR 5.25-7 million	The financial effect is medium.	The risk or opportunity is like to materialise.
EUR 7-8.75 million	The financial effect is high.	The risk or opportunity is highly likely to materialise.
> EUR 8.75 million	The financial effect is extremely high.	The risk or opportunity is certain to materialise.

In the assessment process, Atresmedia's approach to assessing risks and opportunities entailed calculating an average between financial effect and likelihood of occurrence, in alignment with the Internal Audit's approach. Impacts were assessed based on the average between severity and likelihood.

After validation of the assessment scales, the impacts, risks, and opportunities were assessed by stakeholders[11]. The key stakeholder categories involved in this process included workforce, shareholders and investors, suppliers, customers, and society. See section SBM-3 for information on the scope of the interviews held and the questionnaires conducted.

In any event, the double materiality assessment process was unchanged from the previous reporting period.

d) Determination phase

The aim of the determination phase was to identify the Group's material topics. First, both internal and external stakeholder assessments were analysed. Based on that analysis, a weighting of IROs assessed was established, with 60% assigned to the internal stakeholder assessment and 40% to the external stakeholder assessment.

Atresmedia established the threshold for determining material impacts, risks and opportunities at topical level, with a 3.33 threshold defined for impact materiality and a 2.11 threshold for financial materiality. The defined thresholds were used to identify material topics, with the involvement of internal stakeholders to ensure consistency.

IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statements_

The criteria established by Atresmedia to ensure transparency in its Sustainability Statement are described below. The objective of the criteria are to facilitate understanding of the disclosure requirements included in the Statement, as well as to list the topics omitted as they were not considered material in performing the double materiality assessment.

The disclosure requirements presented derive from a comprehensive assessment of all the topics, sub-topics, and sub-sub-topics defined in ESRS 1 AR 16, on the basis of the double materiality principle.

From the start of the assessment, S3 Affected communities was ruled out for identification of IROs since the activity carried out by Atresmedia does not generate impacts for people or groups residing in areas likely to be affected by the Company's operations or its value chain, whether adjacent or remote areas. The Group also has no impact at all on indigenous peoples, either directly or through its business relationships.

Also excluded from the start of the assessment were the following sub-sub-topics for the reasons given:

- E2 Pollution of soil: Atresmedia's activity and its value chain do not contribute to pollution of soil contamination since they do not produce waste or spills that could have an impact in this regard.
- E2 Pollution of living organisms and food resources: Atresmedia's operations and its value chain do not involve processes that discharge chemical pollutants into sensitive ecosystems or affect food production.
- E2 Substances of very high concern: neither Atresmedia's operations nor its value chain includes the treatment and/or generation of substances of very high concern.
- E2 Microplastics: neither Atresmedia nor its value chain uses or generates microplastics, since the use of plastics in operations is minimal and does not represent a key matter.
- E3 Water and marine resources - Water withdrawal: Atresmedia only consumes water from the public network at its sites and throughout its value chain. Therefore, withdrawals are included in the consumption already registered.
- E3 Water and marine resources - Water discharges in the oceans: neither Atresmedia's operations nor its value chain generates waste

[11] *Note that the likelihood of actual impacts has been assessed as the likelihood that materialisation of the impact will have a significant effect.*

discharged directly in to oceans; waste is managed in local public sewerage networks.

- E3 Water and marine resources- Extraction and use of marine resources: neither Atresmedia's operations nor its value chain is related to the extraction and use of marine resources.

- E4 Direct impact drivers of biodiversity loss (climate change; land-use change, fresh water-use change and sea-use change; direct exploitation of organisms and invasive alien species): neither Atresmedia nor its value chain carries out activities is areas of high biodiversity that could be affected by factors such as climate change, land- or water-use change, pollution, or direct exploitation.

- E4 Impacts on the state of species (species population size, species global extinction risk; land degradation; desertification; soil sealing): neither Atresmedia's nor its value chain affects the species population size or contribute to extinction risk, land degradation, desertification or soil sealing, since their activity is not carried out in locations that could cause this impacts.

- E4 Impacts and dependencies on ecosystem services: neither Atresmedia's activity nor its value chain influences the benefits people obtain from ecosystems.

- S4 Personal safety of consumers and/or end-users - Security of a person: neither Atresmedia's operations nor its value chain affects or has control over end-users' physical or mental security. Security of a person is defined as freedom for injury to the body and the mind, or bodily and mental integrity. In this regard, Atresmedia identified the material IROs linked to the "health and safety of consumers and end-users" sub-sub-topic, which is linked to consumers and/or end-users who are dependent on accurate and accessible product- or service-related information to avoid potentially damaging use of a product or service.

- G1 Animal welfare: neither Atresmedia's operations nor its value chain affects or influences animal welfare since those activities are not related to sectors where animal welfare could be compromised.

- G1 Corruption and bribery - Incidents: this sub-sub-topic was ruled out since no related incidents were raised and, therefore, the identified IROs were linked to the "prevention and detection" sub-sub-topic. Nevertheless, the Group will assess incidents of corruption arising during the current year for reporting in the Sustainability Statement.

Of all the impacts, risks and opportunities assessed, the following topics defined by ESRS and related sub-sub- topics were identified as being non-material:

- Topics:
  - E2 Pollution
  - E3 Water and marine resources
  - E4 Biodiversity and ecosystems
  - E5 Resource use and circular economy

All these topics relate to the environmental category of ESRS and were considered non-material as Atresmedia's activity generates minimal environmental impact beyond its contribution to climate change.

A materiality threshold was determined in Atresmedia's process to identify material impacts, risks and opportunities. Both the threshold and the approach used are provided in disclosure requirement IRO-1.

As a result of this process, the table below presents the disclosure requirements addressed in this Sustainability Statement:

General information - ESRS 2		Section with the disclosure	Page
1. Bases for general information	BP-1: General basis for preparation of the sustainability statement	ESRS 2	6-7
	BP-2: Disclosures in relation to specific circumstances	ESRS 2	7-8
2. Governance	GOV-1: The role of the administrative, management and supervisory bodies	ESRS 2	9-13
	GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	ESRS 2	13-14
	GOV-3: Integration of sustainability-related performance in incentive schemes	ESRS 2	15-17
	GOV-4: Statement on due diligence	ESRS 2	17
	GOV-5: Risk management and internal controls over sustainability reporting	ESRS 2	18
3. Strategy	SBM-1: Strategy, business model and value chain	ESRS 2	19-23
	SBM-2: Interests and views of stakeholders	ESRS 2	24-30
	SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS 2	30-34
4. Impact, risk and opportunity management	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	ESRS 2	35-41
	IRO-2: Disclosure Requirements in ESRS covered by the undertaking's sustainability statements	ESRS 2	41-53
	MDR-P: Policies adopted to manage material sustainability matters	ESRS 2	53-54
	MDR-A: Actions and resources in relation to material sustainability matters	ESRS 2	53-54
5. Metrics and targets	MDR-M: Metrics in relation to material sustainability matters	ESRS 2	55
	MDR-T: Tracking effectiveness of policies and actions through targets	ESRS 2	55

Environmental information – Taxonomy, E1		Section with the disclosure	Page
EU Taxonomy			
Background	-	Taxonomy	57
Regulatory context	-	Taxonomy	57-59
Scope of the Taxonomy	-	Taxonomy	59-62
Methodology and results	-	Taxonomy	63-71
E1 - Climate change			
1. Governance	GOV-3: Integration of sustainability-related performance in incentive schemes	ESRS E1	72
2. Strategy	E1-1: Transition plan for climate change mitigation	ESRS E1	72-75
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS E1	75-77
3. Impact, risk and opportunity management	ESRS 2 IRO-1: Description of the processes to identify and assess material climate-related impacts, risks and opportunities	ESRS E1	78-79
	E1-2: Policies related to climate change mitigation and adaptation	ESRS E1	79-80
	E1-3: Actions and resources in relation to climate change policies	ESRS E1	81-87
4. Metrics and targets	E1-4: Targets related to climate change mitigation and adaptation	ESRS E1	88-90
	E1-5: Energy consumption and mix	ESRS E1	90
	E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions	ESRS E1	91-92
	E1-7: GHG removals and GHG mitigation projects financed through carbon credits	ESRS E1	92-93
	E1-8: Internal carbon pricing scheme	ESRS E1	93
	E1-9: Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	ESRS E1	93

Social information - S1, S2, S4		Section with the disclosure	Page
S1 - Own workforce			
1. Strategy	ESRS 2 SBM-2: Interests and views of stakeholders	ESRS S1	95
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS S1	96-99
2. Impact, risk and opportunity management	S1-1: Policies related to own workforce	ESRS S1	99-102
	S1-2: Processes for engaging with own workers and workers' representatives about impacts	ESRS S1	102-104
	S1-3: Processes to remediate negative impacts and channels for own workers to raise concerns	ESRS S1	104-105
	S1-4: Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	ESRS S1	105-111
3. Metrics and targets	S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	ESRS S1	112-113
	S1-6: Characteristics of the undertaking's employees	ESRS S1	113
	S1-7: : Characteristics of non-employee workers in the undertaking's own workforce	ESRS S1	114
	S1-8: Collective bargaining coverage and social dialogue	ESRS S1	114
	S1-9: Diversity metrics	ESRS S1	114
	S1-10: Adequate wages	ESRS S1	114
	S1-11: Social protection	ESRS S1	114
	S1-12: Persons with disabilities	ESRS S1	115
	S1-13: Training and skills development metrics	ESRS S1	115
	S1-14: Health and safety metrics	ESRS S1	115
	S1-15: Work-life balance metrics	ESRS S1	115
	S1-16: Compensation metrics (pay gap and total compensation)	ESRS S1	116
	S1-17: Incidents, complaints and severe human rights impacts	ESRS S1	116

Social information - S1, S2, S4		Section with the disclosure	Page
S² - Workers in the value chain			
1. Strategy	ESRS 2 SBM-2: Interests and views of stakeholders	ESRS S2	117
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS S2	117-119
2. Impact, risk and opportunity management	S2-1: Policies related to value chain workers	ESRS S2	120-121
	S2-2: Processes for engaging with value chain workers about impacts	ESRS S2	121
	S2-3: Processes to remediate negative impacts and channels for value chain workers to raise concerns	ESRS S2	121-122
	S2-4: Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	ESRS S2	122-125
3. Metrics and targets	S2-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	ESRS S2	125
S4 - Consumers and end-users			
1. Strategy	ESRS 2 SBM-2: Interests and views of stakeholders	ESRS S4	126
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS S4	126-132
2. Impact, risk and opportunity management	S4-1: Policies related to consumers and end-users	ESRS S4	132-135
	S4-2: Processes for engaging with consumers and end-users about impacts	ESRS S4	135-137
	S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	ESRS S4	137-138
	S4-4: Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	ESRS S4	138-154
3. Metrics and targets	S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	ESRS S4	155-156

Governance information - G1		Section with the disclosure	Page
G1 - Business conduct			
1. Governance	ESRS 2 GOV-1: The role of the administrative, management and supervisory bodies	ESRS G1	158
2. Impact, risk and opportunity management	ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	ESRS G1	159-160
	G1-1: Corporate culture and business conduct policies and corporate culture	ESRS G1	161-168
	G1-2: Management of relationships with suppliers	ESRS G1	168-170
	G1-3: Prevention and detection of corruption and bribery	ESRS G1	170-171
3. Metrics and targets	G1-5: Political influence and lobbying activities	ESRS G1	172-173
	G1-6: Procurement practices	ESRS G1	173

List of datapoints in cross-cutting and topical standards that derive from other EU legislation

Disclosure Requirement and related datapoint	Benchmark Regulation on sustainability- related disclosures in the financial services sector	Pillar 3 (2) reference	Benchmark regulation on benchmarks (3)	EU Climate Law reference (4)	Page
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator N° 13 in Table I of Annex I		Commission Delegated Regulation (EU) 2020/1816 (5), Annex II		9-13
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		9-13
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator N° 10 in Table III of Annex I				17
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicator N° 4 in Table I of Annex I	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6), Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		19-23
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator N° 9 in Table II of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		19-23
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator N° 14 in Table I of Annex I		Delegated Regulation (EU) 2020/1818 (7), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		19-23

Disclosure Requirement and related datapoint	Benchmark Regulation on sustainability- related disclosures in the financial services sector	Pillar 3 (2) reference	Benchmark regulation on benchmarks (3)	EU Climate Law reference (4)	Page
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		19-23
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) - 2021/1119, Article 2(1)	72-75
ESRS E1-1 Undertakings excluded from Paris- aligned Benchmarks paragraph 16 (g)		Article 449, indent (a) of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2		72-75
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator N° 4 in Table II of Annex I	Article 449, indent (a) of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		88-90
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator N° 5 Table I and Indicator N° 5 in Table II of Annex I				90
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator N° 5 in Table I of Annex I				90
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator N° 6 in Table I of Annex I				90
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicator N° 1 and Indicator #2 in Table I of Annex I	Article 449a, of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		91-92

Disclosure Requirement and related datapoint	Benchmark Regulation on sustainability- related disclosures in the financial services sector	Pillar 3 (2) reference	Benchmark regulation on benchmarks (3)	EU Climate Law reference (4)	Page
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicator N° 3 in Table I of Annex I	Article 449a, of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		91-92
ESRS E1-7 GHG removals and carbon credits paragraph 56			Regulation (EU) - 2021/1119, Article 2(1)		92-93
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Phased-in
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a, of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Phased-in
ESRS E1-9 Breakdown of the carrying value of real estate assets by energy- efficiency classes paragraph 67 (c).		Article 449a, of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral.			Phased-in
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Phased-in
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator N° 8 in Table I of Annex I, indicator N° 2 in Table II of Annex I, indicator N° I in Table II of Annex I, indicator N° 3 in Table II of Annex I				Not material
ESRS E3-1 Water and marine resources paragraph 9	Indicator N° 7 in Table II of Annex I				Not material

Disclosure Requirement and related datapoint	Benchmark Regulation on sustainability- related disclosures in the financial services sector	Pillar 3 (2) reference	Benchmark regulation on benchmarks (3)	EU Climate Law reference (4)	Page
ESRS E3-1 Dedicated policy paragraph 13	Indicator N° 8 in Table II of Annex I				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator N° 12 in Table II of Annex I				Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator N° 6.1 in Table II of Annex I				Not material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator N° 6.1 in Table II of Annex I				Not material
ESRS 2- SBM-3 - E4 paragraph 16 (a) i	Indicator N° 7 in Table I of Annex I				Not material
ESRS 2 - SBM-3 - E4 paragraph 16 (b)	Indicator N° 10 in Table II of Annex I				Not material
ESRS 2 - SBM-3 - E4 paragraph 16 (c)	Indicator N° 14 in Table II of Annex I				Not material
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator N° 11 in Table II of Annex I				Not material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator N° 12 in Table II of Annex I				Not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator N° 15 in Table II of Annex I				Not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator N° 13 in Table II of Annex I				Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator N° 9 in Table I of Annex I				Not material
ESRS 2 - SBM-3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator N° 13 in Table III of Annex I				96-99
ESRS 2 - SBM-3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator N° 12 in Table III of Annex I				96-99
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator N° 9 in Table III and Indicator N° 11 in Table I of Annex I				99-102
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		99-102

Disclosure Requirement and related datapoint	Benchmark Regulation on sustainability- related disclosures in the financial services sector	Pillar 3 (2) reference	Benchmark regulation on benchmarks (3)	EU Climate Law reference (4)	Page
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	Indicator N° 11 in Table III of Annex I				99-102
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	Indicator N° 1 in Table III of Annex I				99-102
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	Indicator N° 5 in Table III of Annex I				104-105
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator N° 2 in Table III of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		115
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator N° 3 in Table III of Annex I				115
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator N° 12 in Table I of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		116
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator N° 8 in Table III of Annex I				116
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator N° 7 in Table III of Annex I				116
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 104 (a)	Indicator N° 10 in Table I and Indicator N° 14 in Table III of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		116
ESRS 2 - SBM-3 - S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicator N° 12 and indicator #13 in Table III of Annex I				117-119
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator N° 9 in Table III and Indicator N° 11 in Table I of Annex I				120-121
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator N° 11 and indicator N° 4 in Table III of Annex I				120-121

Disclosure Requirement and related datapoint	Benchmark Regulation on sustainability- related disclosures in the financial services sector	Pillar 3 (2) reference	Benchmark regulation on benchmarks (3)	EU Climate Law reference (4)	Page
ESRS S1-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator N° 10 in Table I of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		120-121
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		120-121
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator N° 14 in Table III of Annex I				122-125
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator N° 9 in Table III and Indicator N° 11 in Table I of Annex I				Not material
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator N° 10 in Table I of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Not material
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator N° 14 in Table III of Annex I				Not material
ESRS S4-1 Policies related to consumers and end- users paragraph 16	Indicator N° 9 in Table III and Indicator N° 11 in Table I of Annex I				132-135
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 17	Indicator N° 10 in Table I of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		132-135
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator N° 14 in Table III of Annex I				138-154
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator N° 15 in Table III of Annex I				161-168

Disclosure Requirement and related datapoint	Benchmark Regulation on sustainability- related disclosures in the financial services sector	Pillar 3 (2) reference	Benchmark regulation on benchmarks (3)	EU Climate Law reference (4)	Page
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	Indicator N° 6 in Table III of Annex I				161-168
ESRS G1-4 Fines for violation of anti- corruption and anti- bribery laws paragraph 24 (a)	Indicator N° 17 in Table III of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS G1-4 Standards of anti-corruption and anti- bribery paragraph 24 (b)	Indicator N° 16 in Table III of Annex I				Not material

(1) Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (OJ L 317, 9.12.2019, p. 1).

(2) Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation "CRR") (OJ L 176, 27.6.2013, p. 1).

(3) Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

(4) Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9.7.2021, p. 1).

(5) Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published (OJ L 406, 3.12.2020, p. 1).

(6) Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks (OJ L 324,19.12.2022, p.1.).

(7) Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks (OJ L 406, 3.12.2020, p. 17).

Policies and actions_

This disclosure requirement calls for information in relation to specific policies and actions of each topical ESRS, covering environmental, social and governance matters. Therefore, it is detailed in each topical standard. The disclosure requirements are as follows:

- Disclosure requirement - Policies MDR-P: Policies adopted to manage material sustainability matters.
- Disclosure requirement - Actions MDR-A: Actions and resources in relation to material sustainability matters.

Set out below is a summary of the main policies addressed in the Statement, with information on the date of creation, updating and monitoring, as well as how they relate to the topical standards and material topics in this Statement:

POLICIES AND ACTIONS

POLICIES AND ACTIONS	First publication	Latest update	Level of approval	Type of policy	E1 Climate change	S1 Own workforce	S2 Workers in the value chain	S4 Consumers and end-users	G1 Business conduct	Cybersecurity	Responsible advertising	Responsible, truthful and quality	Fighting fake news and disinformation	Regulatory compliance	Content accessibility	Media, information and digital literacy	Employee health & safety and wellbeing	Sustainable investment	Good governance and business ethics	Sustainable productions	Engagement with and impact on the community	Diversity, Equity and Inclusion	Mouthpiece for social causes and the climate	Digital transformation and Artificial Intelligence	Data protection and privacy	Human and labour rights	Climate change
Code of Conduct	2011	2023	Board of Directors	General standard		x	x	x	x					x		x	x		x			x			x	x	x
Corporate Governance Policy	2015	2021	Board of Directors	General standard					x					x					x						x		
General Corporate Responsibility Policy	2010	2021	Board of Directors	General Policy	x	x	x	x	x		x	x	x	x	x	x	x			x	x	x	x		x	x	x
Responsible Advertising Policy	2010	2024	General Advertising Department	Linked to the CR Policy				x			x			x	x						x	x				x	
Environment and Climate Change Policy	2010	2024	Corporate General Manager	Linked to the CR Policy	x			x						x						x			x				x
Human Resources Policy	2010	2024	Corporate General Manager	Linked to the CR Policy		x								x			x		x		x	x			x	x	
Diversity, Equity and Inclusion Policy	2024	N/A	Corporate General Manager	Linked to the CR Policy		x		x			x	x			x							x	x			x	
Policy on the Responsible Use of Artificial Intelligence Tools	2023	N/A	Board of Directors	General standard					x				x						x					x			
Health and Safety Policy	2020	N/A	Chief Executive Officer*	General standard		x	x							x			x									x	
Code of Ethics of Antena 3 Noticias	2012	2024	Antena 3 Newsroom	Code of conduct				x				x	x										x			x	
Code of Ethics of laSexta Noticias	2012	2024	laSexta Newsroom	Code of conduct				x				x	x										x			x	
General Data Protection Policy	2018	N/A	Compliance Committee	General standard		x		x			x			x					x						x	x	
Information Security Policy	2022	2022	Security Committee	General standard					x	x																	

METRICS AND TARGETS

This disclosure requirement calls for information in relation to specific targets of each topical ESRS, covering environmental, social and governance matters. Therefore, it is detailed in each topical standard. The disclosure requirements are as follows:

- Disclosure requirement - Metrics MDR-M: Metrics in relation to material sustainability matters.

- Disclosure requirement - Targets MDR-T: Tracking effectiveness of policies and actions through targets.

2 Environmental information_

2 Environmental information_

2.1 EU TAXONOMY

Background_

In 2018, the European Commission launched an action plan[12] with the objective of financing sustainable growth, directing capital flows towards more sustainable activities. This process sought to strengthen sustainable finance, reorienting investment flows. Against this backdrop, in 2019, it presented the European Green Deal, a package of measures designed to set the European Union (EU) on the path to a green transition, reaching climate neutrality by 2050. As part of this initiative, several key regulations were developed, including the **EU taxonomy**, a system for **classifying economic activities according to their potential impact and contribution to sustainability.**

The **EU Taxonomy** constitutes a unified classification system that outlines harmonised benchmarks for determining whether an economic activity is sustainable based on current practices in the market and the technical expert group's initiatives and advisory assistance. This framework provides the foundations for creating standards and labels for sustainable financial products. With the list of activities and specific technical criteria for each activity, companies, investors and regulators alike can obtain more standard and reliable information on which activities contribute to the achievement environmental objectives and that, therefore, are making a greater contribution to the transition to a green economy.

Regulatory context_

The regulatory framework of the EU Taxonomy was set out in Regulation (EU) 2020/852[13], establishing a framework to facilitate sustainable investment. This regulation defines six key environmental objectives:

- Climate change mitigation.
- Climate change adaptation.
- Sustainable use and protection of water and marine resources.
- Transition to a circular economy.
- Pollution prevention and control.
- The protection and restoration of biodiversity and ecosystems.

This regulation was followed by two complementary Commission **Delegated Regulations, Delegated Regulation (EU) 2021/2139 of 4 June and Delegated Regulations (EU) 2021/2178 of 6 July**[14]. They first detailed economic activities that contributed substantially to climate change mitigation, establishing technical screening criteria by economic activity listed. The second specified the content and presentation of information to be disclosed by undertakings concerning environmentally sustainable economic activities, and specifying the methodology to comply with disclosure obligations, e.g., indicators and calculation methodology.

The Taxonomy's regulatory framework was updated again in 2023. **Delegated Regulation (EU) 2023/2485 of 27 June** included additional economic activities that contribute substantially to climate change mitigation and adaptation and updated some of the technical screening criteria. Meanwhile, **Delegated Regulation (EU) 2023/2486, also of 27 June**, presented the list of economic activities and technical screening criteria for determining the conditions whether an economic activity contributed substantially to other environmental objectives, such as the sustainable use and protection of water and marine resources, the transition to a circular economy, to pollution prevention, or to the protection and restoration of biodiversity and ecosystems.

12 *Action Plan: Financing sustainable growth.*

13 *The taxonomy regulation outlines several reporting requirements for certain financial market participants that make available financial products and undertakings that are subject to the obligation to publish a non-financial statement pursuant to Article 19bis Directive 2013/34/EU of the European Parliament and of the Council or a consolidated non-financial statement pursuant to Article 29 bis of that Directive.*

14 *Amended to introduce economic activities in the nuclear and natural gas sector by Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosure for those economic activities.*

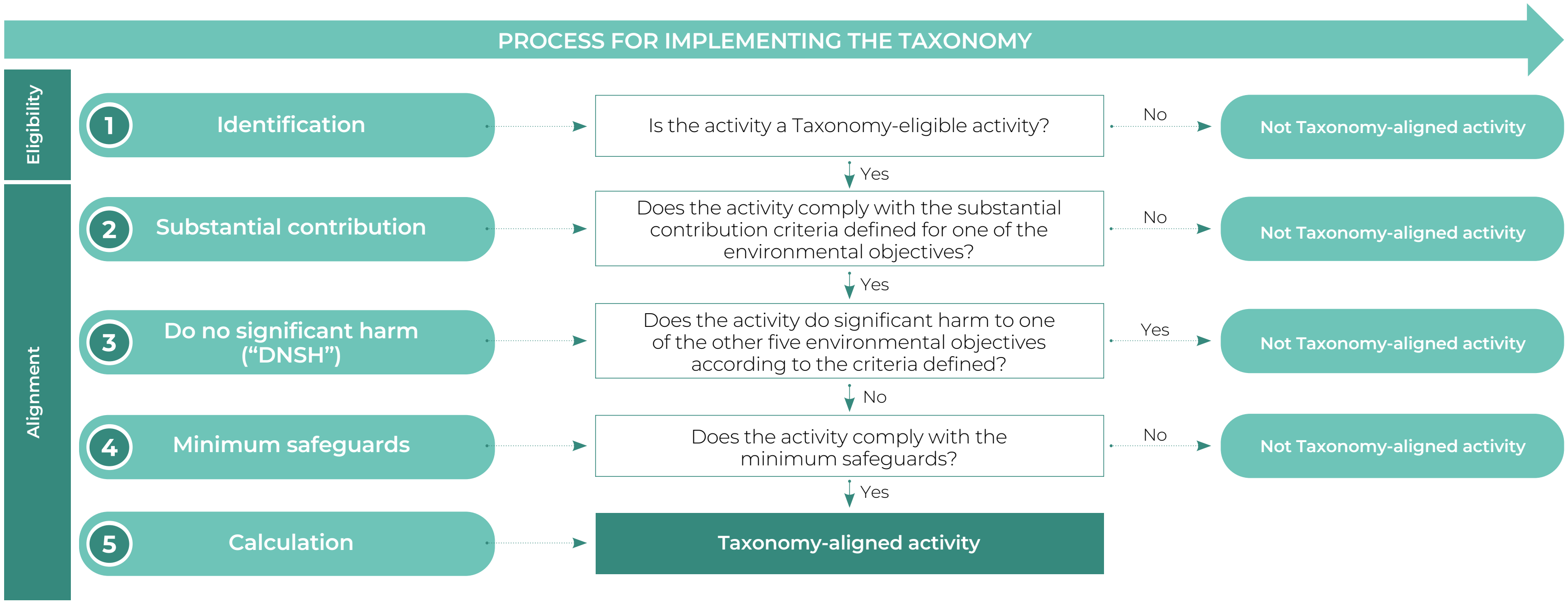
Taxonomy reporting requirements_

Undertakings falling under the Taxonomy must perform annual assessments of compliance using two key criteria, eligibility and alignment, and report the results in their statement:

- **Eligible activities:** an economic activity carried out by an undertaking is eligible if it matches the description of an activity listed in the annexes of Delegated Regulation (EU) 2021/2139 of 4 June 2021 or one listed in the annexes of Delegated Regulation (EU) 2023/2486 of 27 June 2023. Eligibility has a nature of potentiality, i.e., an eligible activity is one that could become sustainable according to the EU Taxonomy.
- **Aligned activities:** alignment of an economic activity indicates that it contributes substantially to one or more of the environmental objectives defined by the European Commission. This level of contribution is measured by compliance, not only with the definitions of the economic activities, but also at least one substantial contribution criteria, the principle of do no significant harm (DNSH) and certain minimum social safeguards.

In addition, **Commission Delegated Regulation (EU) 2021/2178** determined the key performance indicators (KPIs) that must be reported, such as the proportion of Taxonomy-eligible and Taxonomy-aligned economic activities of the undertaking's total **turnover, CapEx** and **OpEx**.

The process for implementing the Taxonomy is as follows:



The requirements for applying the obligations of the Taxonomy have evolved. In 2021, undertakings only had to report on eligibility for the climate change mitigation and adaptation objectives. In the 2022 reporting year, they were required to provide disclosures for both eligibility and alignment with the same objectives and in 2023 the eligibility of all environmental objectives and the alignment of climate change mitigation and climate change adaptation objectives. In 2024, Atresmedia must assess both the eligibility and alignment of all the environmental objectives in the Taxonomy.

Lastly, application of the EU Taxonomy and calculation of KPIs considered, as for the rest of the Statement, the activity of **Atresmedia Corporación de Medios de Comunicación S.A. and subsidiaries** in accordance with the scope of consolidation in the consolidated financial statements.

Scope of the Taxonomy_

As an audiovisual media group, Atresmedia does not have a high potential impact on climate change. However, given its activity and leadership position in Spain, it can raise awareness among and inform viewers about climate change-related issues. Therefore, the Group's activity is considered an enabling economic activity in the EU Taxonomy. However, this assumption does not mean that the Group cannot contribute to climate change mitigation if it performs an economic activity included in that Taxonomy objective.

Before assessing the activities considered eligible for the Group, it should be noted that its activity is mainly based on the **production, distribution and broadcasting of audiovisual content.** This content is distributed through its traditional free-to-air television channels, its radio stations and its digital video-on-demand platform, **atresplayer.**

In the area of advertising, Atresmedia Group commercially operates these distribution channels through its **Atres Advertising** marketing arm, by selling airtime to advertisers. Moreover, through its **SmartClip** (digital marketing agency) subsidiary, the Group sells various forms of Internet advertising on third-party media.

Apart from advertising, Atresmedia is also involved in **other businesses that are not advertising-driven**, such as production of film content for screening in cinemas, monetisation of content on the company's own subscription video-on-demand platform (atresplayer Premium), and sale of content produced by the Group to other television networks or SVOD platforms, both individually and packaged as complete channels.

For the 2024 reporting year, only non-advertising-driven businesses (e.g. content production and distribution through the above-mentioned channels) were included in the Taxonomy assessment. This approach is based on the Group's current business model.

Eligibility assessment_

After assessing the scope of the Taxonomy, Atresmedia performed an in-depth analysis of its potentially Taxonomy-eligible economic activities. It also assessed the Group's environmental investments carried out in 2024. This was to verify whether they were related to the Taxonomy activities listed for any of the six environmental objectives.

As a result of this assessment, taking information provided by Atresmedia's various areas, as was the case the year before, the following were identified as **eligible activities** that comply with **Delegated Regulation (EU) 2021/2139 of 4 June 2021:**

- Activities that can make a substantial contribution to **climate change adaptation:**
  - **8.3** Programming and broadcasting activities.
  - **13.3** Motion picture, video and television programme production, sound recording and music publishing activities.
- Activities that can make a substantial contribution to **climate change mitigation:**
  - **7.3** Installation, maintenance and repair of energy efficiency equipment.
  - **7.4** IInstallation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings).

The **key assumptions** in the process for determining eligibility of those activities were as follows:

- First, as determined in previous years, Atresmedia **core business** (news and entertainment content creation and broadcasting, and distribution through a range of audiovisual channels, including television, cinema or digital platforms, as well as radio) is related to the description of **activities 8.3 and 13.3** in the climate change adaptation annex and, therefore, considered eligible activities. These activities generate turnover for the Group, while it also makes significant investments (CapEx) and incurs maintenance (OpEx) expenses associated with them.

- As in 2023, after reviewing CapEx in 2024, the following activities of the **climate change mitigation** annex were considered Taxonomy-eligible activities:

    - **7.3** as Atresmedia has invested in lighting systems, air conditioners, windows, HVAC equipment and pumps, and refrigeration pipes that enhance the energy efficiency of the Group's offices.

    - **7.4** as Atresmedia has performed OpEx on the electric vehicle (EV) charging stations at its San Sebastián de los Reyes offices.

The following chart provides a summary of eligible activities by KPI based on the assessment conducted by Atresmedia:

	Climate change adaptation		Climate change mitigation	
	8.3	13.3	7.3	7.4
Turnover	Yes	Yes	No	No
CapEx	Yes	Yes	Yes	No
OpEx	Yes	Yes	No	Yes

Alignment assessment_

After the eligibility assessment, Atresmedia then assessed alignment. This is based on compliance with three levels of assessment: substantial contribution criteria of eligible activities, do no significant harm ("DNSH") to the rest of the environmental objectives, and minimum social safeguards.

Following is a discussion of the result, differentiating between the eligible activities in the climate mitigation annex and the eligible activities in the climate adaptation annex.

Assessment of compliance with the substantial contribution criteria_

Activities 8.3 and 13.3 of the climate change adaptation objective:

Activities 8.3 and 13.3 are included in the Taxonomy regulation as **enabling** activities and must meet the technical screening criteria for **substantial contribution** to climate change adaptation to qualify as aligned activities. According to the technical screening criteria, the undertaking must identify the material physical climate risks (for instance, heat stress, forest fires, etc.) with respect to the activity listed in **Annex A** of the Taxonomy[15].

Atresmedia meets these requirements since the Group carried out a climate risk analysis all of its assets in 2022, assessing its exposure to climate risk factors at the asset level. The analysis considered short-term (2030) and long-term (2050) time horizons, analysed scenarios RCP2.6 (in which mitigation efforts lead to a very low level of forcing) and RCP8.5 (with a very high level of GHG emissions) and considered all the risk factors set out in **Annex A** of the Taxonomy.

The conclusion was reached that there were no risks with the potential to significantly affect Atresmedia's operations or financial statements. This was done by:

1. analysing risk factors in the different scenarios and time horizons mentioned above;
2. transposing the implications of climate change physical risk factors into operational and financial risks to the Group; and
3. assessing the criticality of the risks.

This climate physical risk assessment confirmed compliance with the substantial contribution criteria to climate change adaptation of activities 8.3 and 13.3. This is because no material climate-change related corporate risks were identified for the Group (see disclosure requirement IRO-1 of the E1 standard in this Statement for further information on the physical climate risk assessment).

Activities 7.3 and 7.4 of the climate change mitigation objective:

As regards compliance with the substantial contribution to **climate change mitigation** criteria of **activity 7.3**, the assessment showed that CapEx items associated with that activity comply with at least one of those listed in the Taxonomy. The technical specifications of the different equipment were also analysed to ensure they meet the requirements of the technical screening criteria. For **activity 7.4**, the regulation does not require compliance with any substantial contribution criteria.

Assessment of compliance with criteria for 'do no significant harm' (DNSH)_

As part of the process for determining alignment, Atresmedia assessed compliance with the technical screening criteria for 'do no significant harm' (DNSH) of its eligible activities.

[15] Delegated Regulation (EU) 2021/2139 establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives.

For activities **8.3** and **13.3** of the climate change adaptation objective, the Taxonomy considers that they are not likely to cause significant harm to the other objectives. However, for activities 7.3 and 7.4 of the climate change mitigation annex, the Taxonomy lists different requirements, which were assessed by Atresmedia to determine that:

- All eligible items of CapEx of activity **7.3** comply with the requirements set out in **Appendix A** and **Appendix C.**

- All eligible items of OpEx of activity **7.4** comply with the requirements set out in **Appendix A.**

As explained above, **Appendix A** relates to having a climate physical risk assessment, which Atresmedia does. Regarding **Appendix C**, a review was carried out confirming that none of the Group's activities relate to manufacturing, placing on the market or use of the substances (chemicals) listed in that appendix. Therefore, Atresmedia Group complies with the DNSH requirement of all its eligible activities.

Assessment of compliance with minimum safeguards_

Another step in the assessment of Taxonomy alignment is ensuring compliance with the minimum social safeguards.

These safeguards were assessed at corporate level and are set out in **Article 18 of Regulation (EU) 2020/852**[16]. The social minimum safeguards are divided up into four core topics:

- Human rights.

- Fair competition.

- Taxation.

- Bribery/corruption.

Atresmedia has a Code of Conduct that outlines its commitment to conducting its business and professional activities in accordance with applicable legislation and ensuring respect for, protection of and compliance with regulations regarding human rights, anti-corruption, anti-tax evasion and anti-competitive behaviour. The Group also has a Whistleblowing Channel available to all stakeholders to ensure correct compliance with relevant legislation.

Atresmedia also has a series of internal policies reinforcing the commitments outlined in the Code of Conduct, such as the Human Resources Policy, the Corporate Responsibility Policy, and the Responsible Advertising Policy. The Code of Conduct includes a dedicated section on relations with suppliers, highlighting the transparent collaboration and compliance with Atresmedia's social responsibility.

As a socially responsible company, Atresmedia is a signatory of the UN Global Compact, endorses Autocontrol's Code of Conduct, has an Anti-corruption Policy, a Regulatory Compliance Model, a supplier certification process, an Internal Control over Financial Reporting system, and a Protocol for Handling Tax-Significant Transactions. Moreover, Atresmedia continuously implements measures to protect minors, subtitles its content to make it more accessible and carries out fact-checking processes, while it also provides ongoing training to employees on topics related to human rights, competition and corruption, and monitors the related risks.

Atresmedia also has a human rights due diligence process, which it performed in 2023. The result of that process confirmed that Atresmedia Group does not have any adverse impact on human rights. Nevertheless, the analysis helped the Group to understand on which salient issues it needed to reinforce its control mechanisms (see disclosure requirement S2-4 of ESRS S2 Workers in the value chain).

Within its management model, Atresmedia can consider that its procedures are aligned with principles and good practices in human rights, fair competition, taxation, and bribery/corruption.

[16] *"The minimum safeguards shall be procedures implemented by an undertaking that is carrying out an economic activity to ensure the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights".*

Methodology and results_

General considerations_

After the eligibility and alignment assessments, Atresmedia calculated the proportion of its **turnover, CapEx and OpEx** derived from Taxonomy-eligible and Taxonomy-aligned economic activities for the climate change mitigation and climate change adaptation objectives. This was done in accordance with **Delegated Regulation (EU) 2021/2178 of 6 July.**

For the calculation, Atresmedia used the **Group's consolidated information,** including all companies that fall within the consolidation scope, without considering intercompany transactions. The various items used for the three key indicators were identified on the basis of corporate management control criteria.

Notably, to ensure the reliability of the information reported, Atresmedia took proper care to **avoid double counting:**

- The main sources of information are accounting and management information used for the consolidated statement of profit or loss, based on the outward reporting form provided by the National Securities Market Commission.
- To analyse this accounting information, we checked subtotals to ensure that all data is included at all times.
- CapEx and OpEx items related to economic activities 7.3 and 7.4 were identified to exclude them from eligible CapEx and OpEx of economic activities 8.3 and 13.3, ensuring that double counting is avoided.

For activities considered to be climate change enabling activities (8.3 and 13.3), according to the standard they must provide a technology, product, service, information or practice that helps to increase the third parties' level of resilience to climate physical risks. Due to the diversity of the content it broadcasts and produces, as well as the breadth of its audiences, Atresmedia is able to convey messages that inform and raise awareness of the possible impacts of climate change, thus helping to make audiences more resilient.

In this regard, in line with previous years, the following approach was used to meet this criterion:

- The Group identified the content it broadcasts that does help raise awareness within society by finding content that bears some connection with climate change, such as rising sea levels, rising temperatures, water stress, heat waves and floods, among others[17].
- In addition to these terms, all meteorological content broadcast by Atresmedia Group will also be considered aligned, including both the weather sections of the news programmes and weather- related programming (for example, *Mundo Brasero*). As a specific case of 2024, Atresmedia Group broadcast a large volume of content related to the DANA weather event that severely affected parts of Spain in October 2024 on the news and current affairs programmes of Antena 3, laSexta and Onda Cero. *Antena 3 Noticias* and *laSexta Noticias* provided coverage and special programmes, such as *La peor DANA* del siglo (the century's worst DANA) and *Especial DANA* (DANA special), while laSexta aired *La DANA, foco de bulos* (the DANA a source of fake news) as part of its *Conspiranoicos* show.

Lastly, given that Atresmedia's normal activity includes both radio and television programming and broadcasting, as well as the production of audiovisual content for its different platforms, channels and broadcasters, from an accounting standpoint it is hard to discriminate the various items linked to economic activities 8.3 and 13.3. Similarly, according to the description of these activities, the technical screening criteria are identical for both activities, which is why the KPIs are still reported jointly.

[17] *The associated concepts are aligned with the risk factors identified in Annex A of Commission Delegated Regulation (EU) 2021/2139.*

Proportion of taxonomy-eligible and taxonomy-aligned turnover_

Eligibility_

The first indicator in the regulation is turnover. Section 1.1.1 of **Annex I of Commission Delegated Act 2021/2178 of 6 July 2021** states that the numerator is defined as the part of the net turnover derived from products or services, including intangibles, associated with Taxonomy-aligned economic activities and that the denominator is net turnover as defined in IAS 1, paragraph 82(a). Considering these definitions, the calculation was made as follows:

- **Numerator:** For the assessment of **eligibility**, the most restrictive scenario was selected, so it did not consider the sale of advertising spaces; i.e., it only considered accounting items linked to content product and distribution.
- **Denominator:** Atresmedia considered the disclosures in Note 20 to the Group's annual consolidated financial statements for both the assessment of eligibility and the assessment of alignment.

In 2024, Atresmedia Group turnover considered **eligible** relates exclusively to economic activities 8.3 and 13.3 as revenue generators:

	Climate change adaptation
	8.3 / 13.3
Turnover	Revenue from the creation and production of audiovisual content (television, digital, film) and broadcasting over conventional and digital channels.

The proportion of eligibility of 2024 was 9.09%. The year-on-year change was 21.46% due to the increase in revenue from content production and distribution.

Alignment_

To calculate the **numerator** of Taxonomy-aligned activities, an estimate was made of the number of hours of broadcasting of content related to the key concepts associated with climate change adaptation, focusing on own productions that generate revenue not associated with advertising (atresplayer and Canal Internacional). The time of the taxonomy-aligned content was multiplied by the turnover/hour of those platforms, thus giving the total turnover aligned with the taxonomy.

After the assessment of alignment, the conclusion was that the proportion of turnover from environmentally sustainable activities (Taxonomy-aligned) was 0.02% (EUR 233,663.53). The total change in Taxonomy-aligned revenue was 2.80%.

Proportion of CapEx eligibility and alignment_

Eligibility_

This second KPI envisaged in the regulations is the proportion of capital expenditure (CapEx) relating to assets or processes associated with economic activities covered by the Taxonomy.

Therefore, to calculate the eligibility and alignment percentages, the **denominator** will include all additions to property, plant and equipment (in accordance with IAS 16 *Property, Plant and Equipment*, paragraph 73) and intangible assets (in accordance with IAS 38 Intangible Assets, paragraph 118), before depreciation, amortisation and any remeasurements. In this regard, considerations on investment property, agriculture and leases under accounting standards IAS 40, IAS 41 and IFRS 16, respectively, do not apply. Considering these definitions, the calculation was made as follows:

- **Numerator of activities 8.3 and 13.3:**
  - We considered expenditure on property, plant and equipment related to technical material, such as video and audio equipment for television and radio, and other expenditure on other facilities and tools, to be eligible. Additions to intangible assets related to

computer software (directly related to the broadcasting activity), the atresplayer platform, digital systems, radio applications and website development, and audiovisual production were counted as Taxonomy-eligible items.

- As in the previous year, investments in property, plant and equipment consisting of the acquisition of land and buildings, furniture, information processing equipment, or other tangible and intangible fixed assets related to industrial property or other computer applications were considered Taxonomy-non-eligible activities.

- **Numerator of activity 7.3:** This calculation was made using items relating to CapEx that meet the description of those activities. After obtaining the calculations of both numerators, the CapEx of economic activity **7.3** was excluded from the items related to eligible CapEx of economic activities **8.3** and **13.3** to avoid double accounting.

In short, Atresmedia Group's CapEx considered **eligible** in 2024 related to activities 8.3 and 13.3 of the climate change adaptation annex and activity 7.3 of the climate change mitigation annex.

	Climate change adaptation	Climate change mitigation
	8.3 / 13.3	7.3
CapEx	Expenditure relating to the creation and production of audiovisual content (television, radio, film) and broadcasting over conventional and digital channels.	Expenditure related to energy efficiency in buildings and electric vehicle charging stations.

The total proportion of CapEx eligibility of 2024 was 72.51%. The year-on-year change was 86.83% due to the significant increase in CapEx by the Group in audiovisual productions (intangible CapEx).

Alignment_

- **Alignment numerator of activities 8.3 and 13.3:** The calculation started from an estimate of eligible CapEx derived from Atresmedia's own productions (% of own production costs). Own production CapEx was multiplied using an additional proxy to the one used to calculate turnover, estimating the hours of broadcasting of programming labelled under climate change adaptation over the total hours of broadcasting.

- **Alignment numerator of activity 7.3:** The calculation of activity 7.3 considered that the entire amount is aligned after the review of the related technical factsheets and compliance with DNSH criteria.

In 2024, after the assessment of alignment, the conclusion was that the proportion of CapEx of environmentally sustainable activities (Taxonomy-aligned) was 0.51% (EUR 182,892.74). The total change in Taxonomy-aligned CapEx was -54.60%. The decrease in aligned CapEx was partially due to CapEx in 2023 in charging stations, unlike this year.

Proportion of OpEx eligibility and alignment_

Eligibility_

The last KPI to report is OpEx, defined as the proportion of capital or operating expenditure derived from assets or processes associated with economic activities covered by the Taxonomy. Considering this definition, the calculation was made as follows:

- **Denominator:** The calculation for both the eligibility and alignment exercise includes accounting items 621 and 622 in Spain's General Accounting Plan, which cover direct non-capitalised costs that relate to OpEx and repairs and any other direct expenditures relating to the day-to-day servicing of property, plant and equipment that are necessary to ensure the continued and effective functioning of such assets.

- **Eligibility numerator of activities 8.3 and 13.3:** This figure included the repair and maintenance of plant for production systems, software and transport items, the latter mainly associated with radio, as was the case the year before. In addition, as in previous reporting, short-term leases of buildings, offices and production facilities and leases of plant such as video production equipment, sound production, lighting, image capture, mobile units, and scenery leases, were included as eligible. Lastly, the repair and maintenance of furniture and office equipment are not included as Taxonomy-eligible activities. We also excluded other leases, such as vehicle and computer equipment leases.

- **Eligibility numerator of activity 7.4:** This data used items of operating expenditure that meet the description of that activity. After obtaining the calculations of both numerators, the OpEx of activity 7.4 was excluded from the item related to Taxonomy-eligible OpEx of economic activities 8.3 and 13.3 to avoid double counting.

Atresmedia Group's operating expenditure considered **eligible** in 2024 related to activities **8.3** and **13.3** of the climate change adaptation annex and activity **7.4** of the climate change mitigation annex.

	Climate change adaptation	Climate change mitigation
	8.3 / 13.3	7.4
OpEx	Expenditure relating to the creation and production of audiovisual content (television, radio, film) and broadcasting over conventional and digital channels.	Expenditure related to energy efficiency in buildings and electric vehicle charging stations.

The proportion of OpEx eligibility of 2024 was 68.03%. The year-on-year change was 10.64% due to the slight increase in the Group's OpEx related to content production and distribution.

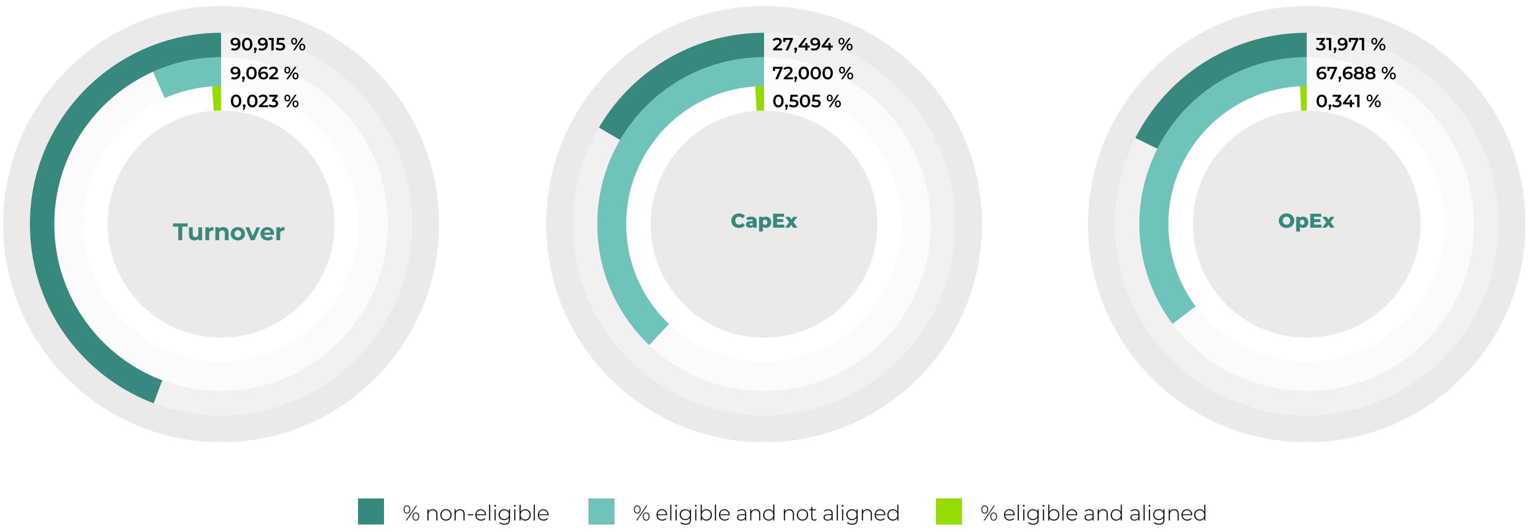
Alignment_

- **Alignment numerator of activities 8.3 and 13.3:** As with the calculation of the CapEx numerator, aligned OpEx of activities **8.3** and **13.3** was calculated by taking the estimated amount of eligible OpEx associated with own productions (% of own production costs) and multiplying it by the proxy associated with content that meets the technical screening criteria.

- **Alignment numerator of activity 7.4:** For the alignment numerator of activity 7.4, the entire amount was considered Taxonomy-aligned since, as noted previously, this activity has no technical screening criteria and meets DNSH.

In 2024, after the assessment of alignment, the conclusion was that the proportion of OpEx of environmentally sustainable activities (Taxonomy-aligned) was 0.34% (EUR 76,366.86). The total change in Taxonomy-aligned OpEx was -73.67%. The difference was due in part to the decrease in OpEx of Taxonomy-aligned energy efficiency assets compared to the year before.

Result of KPIs: Turnover, CapEx and OpEx_



Nuclear and fossil gas related activities according to the Taxonomy_

	Nuclear energy related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
	Actividades relacionadas con el gas fósil	
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Proportion of Taxonomy-eligible and Taxonomy-aligned turnover, CapEx and OpEx_

	Proportion of turnover/Total turnover		Proportion of CapEx/Total CapEx		Proportion of OpEx/Total OpEx	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective	Taxonomy-aligned per objective	Taxonomy- eligible per objective	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	0.00%	0.00%	0.10%	0.87%	0.02%	0.04%
CCA	0.02%	9.09%	0.40%	71.63%	0.32%	67.99%
WTR	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
CE	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
PPC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
BIO	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Proportion of Taxonomy-eligible and Taxonomy-aligned turnover_

Financial year 2024	2024			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")									
Economic activities	Code(s)	Turnover (EUR)	Proportion of Turnover, 2024	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or eligible (A.2.) turnover, 2023	Category enabling activity	Category transitional activity
A. TAXONOMY-ELIGIBLE ECONOMIC ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Programming and broadcasting activities	CCA 8.3	EUR 233,663.53	0.02%	N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.02%	E	
Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3			N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y		E	
Turnover of environmentally sustainable activities (Taxonomy- aligned) (A.1)		**EUR 233,663.53**	**0.02%**	**0.00%**	**0.02%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	Y	Y	Y	Y	Y	Y	Y	**0.02%**		
Of which: Enabling		EUR 233,663.53	0.02%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.02%	E	
Of which: Transitional		EUR 0.00	0.00%	0.00%						Y	Y	Y	Y	Y	Y	Y	0.00%		T
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Programming and broadcasting activities	CCA 8.3	EUR 92,241,139.54	9.06%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								7.81%		
Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3			N/EL	EL	N/EL	N/EL	N/EL	N/EL										
Turnover of Taxonomy-eligible but not environmentally sustainable economic activities (not Taxonomy-aligned activities) (A.2)		**EUR 92,241,139.54**	**9.06%**	**0.00%**	**9.06%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**								7.81%		
A. Turnover of Taxonomy-eligible activities (A.1+A.2)		**EUR 92,474,803.07**	**9.09%**	**0.00%**	**9.09%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**								7.84%		
B. TAXONOMY NON-ELIGIBLE ECONOMIC ACTIVITIES																			
Turnover of Taxonomy-non-eligible activities		EUR 925,403,967.13	90.91%																
TOTAL		EUR 1,017,878,770.20	100%																

Proportion of CapEx eligibility and alignment_

Financial year 2024	2024			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")									
Economic activities	Code(s)	CapEx (EUR)	Proportion of CapEx, 2024	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or eligible (A.2.) CapEx, 2023	Category enabling activity	Category transitional activity
A. TAXONOMY-ELIGIBLE ECONOMIC ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Programming and broadcasting activities	CCA 8.3	EUR 146,476.89	0.40%	N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.47%	E	
Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3			N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y		E	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	EUR 36,415.85	0.10%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.67%	E	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	EUR 0.00	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1.29%	E	
CapEx of environmentally sustainable activities (Taxonomy- aligned) (A.1)		**EUR 182,892.74**	**0.51%**	**0,10%**	**0.40%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**2.43%**		
Of which: Enabling		EUR182,892.74	0.51%	0,10%	0.40%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	2.43%	E	
Of which: Transitional		EUR 0.00	0.00%	0,00%						Y	Y	Y	Y	Y	Y	Y	0.00%		T
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Programming and broadcasting activities	CCA 8.3	EUR 25,772,769.00	71.23%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								82.25%		
Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3			N/EL	EL	N/EL	N/EL	N/EL	N/EL										
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	EUR 279,659.30	0.77%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.00%		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	EUR 0.00	0.00 €	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.00%		
CapEx of Taxonomy-eligible but not environmentally sustainable economic activities (not Taxonomy-aligned activities) (A.2)		**EUR 26,052,428.30**	**72.00%**	**0.77%**	**71.23%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**								**82.25%**		
A. CapEx of Taxonomy-eligible activities (A.1+A.2)		**EUR 26,235,321.04**	**72.51%**	**0.87%**	**71.63%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**								**84.67%**		
B. TAXONOMY NON-ELIGIBLE ECONOMIC ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities		EUR 9,948,481.78	27.49%																
TOTAL		EUR 36,183,802.82	100%																

Proportion of OpEx eligibility and alignment_

Financial year 2024	2024			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")									
Economic activities	Code(s)	OpEx (EUR)	Proportion of OpEx, 2024	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or eligible (A.2.) OpEx, 2023	Category enabling activity	Category transitional activity
A. TAXONOMY-ELIGIBLE ECONOMIC ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Programming and broadcasting activities	CCA 8.3	EUR 72,334.82	0.32%	N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.35%	E	
Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3			N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y		E	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	EUR 532.00	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1.09%	E	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	EUR 3,500.04	0.02%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	E	
OpEx of environmentally sustainable activities (Taxonomy- aligned) (A.1)		**EUR 76,366.86**	**0.34%**	**0.02%**	**0.32%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**1.44%**		
Of which: Enabling		EUR76,366.86	0.34%	0.02%	0.32%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.44%	E	
Of which: Transitional		EUR 0.00	0.00%	0.00%						Y	Y	Y	Y	Y	Y	Y	0.00%		T
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Programming and broadcasting activities	CCA 8.3	EUR 15,163,741.09	67.66%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								67.13%		
Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3			N/EL	EL	N/EL	N/EL	N/EL	N/EL										
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	EUR 5,491.53	0.02%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.00%		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	EUR 0.00	0.00 €	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.00%		
OpEx of Taxonomy-eligible but not environmentally sustainable economic activities (not Taxonomy-aligned activities) (A.2)		**EUR 15,169,232.62**	**67.69%**	**0.02%**	**67.66%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**								**67.13%**		
A. OpEx of Taxonomy eligible activities (A.1+A.2)		**EUR 15,245,599.48**	**68.03%**	**0.04%**	**67.99%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**								**68.57%**		
B. TAXONOMY NON-ELIGIBLE ECONOMIC ACTIVITIES																			
OpEx of Taxonomy-non-eligible economic activities		EUR 7,164,793.30	31.97%																
TOTAL		EUR 22,410,392.78	100%																

2 Environmental information_

ESRS E1

2.2 CLIMATE CHANGE

Atresmedia is well aware of how important it is to protect the environment and address the global environmental challenges it faces, although the environmental impact of the audiovisual industry is small compared to other economic sectors. Therefore, the Company has spent the last few years working on defining an environmental strategy based on best practices to minimise its impact. Matters related to environmental management are built into the Company's decision-making and daily activities, within a framework of action that is supervised by a governance structure involving various areas of Atresmedia and its control bodies. Thanks to this approach and the knowledge of its professionals, Atresmedia is able to tackle environmental challenges from a cross-cutting perspective, paying attention to the environmental risks and impacts of its operations to minimise them, as well as contributing to the fight against climate change and protecting the environment.

In order to formalise and solidify this commitment, in 2022 Atresmedia worked to define its Net Zero strategy and set concrete emission reduction targets with the aim of becoming Net Zero by 2050. In addition, in 2023, the Company's decarbonisation strategy and targets were endorsed and verified by the Science Based Targets initiative (SBTi).

Moreover, as a media company and aligned with its corporate purpose, the Group understands that its greatest contribution to the environment lies in raising awareness in society and to make every citizen aware of their individual role in curbing climate change and building a more climate resilient society.

GOVERNANCE

ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes_

Since 2021, Atresmedia has linked 5% of executive directors' variable remuneration to achievement of four ESG indicators, including a climate indicator. To be eligible for this remuneration, they must deliver at least 50%. As of 2024, this indicator is related to compliance with the Company's Net Zero strategy, specifically to achieving 95% renewable electricity consumption by 2026 and above 93% each year until then. The Group estimates that by increasing its consumption of renewable energy it will reduce its market-based Scope 2 GHG emissions, contributing to the decarbonisation goals and targets described in section E1-4 (see disclosure requirement ESRS 2 GOV-3 for more information on the integration of sustainability-related performance in incentive schemes).

STRATEGY

E1-1 Transition plan for climate change mitigation_

Atresmedia Group has a deep decarbonisation strategy for its operations, with GHG emission-reduction targets for the short term[18] (2030) and long term (2050) for Scopes 1, 2 and 3. The targets are science based and were validated by the SBTi in 2023, so they are compatible with the limiting of global warming to 1.5°C in line with
the Paris Agreement[19].

18 SBTi time horizons.
19 Atresmedia is not excluded from the EU Paris-aligned benchmarks.

Atresmedia's decarbonisation targets, published on the SBTi website, represent absolute emission reduction targets for greenhouse gas for Scope 1 and 2 combined and Scope 3 GHG emissions, compared to its base year (2019). The following table shows Atresmedia's emission reduction targets[20] in percentage relative to the base year of its strategy:

Scope	Base year (2019)	Short term (2030)	Long term (2050)
1+2	10,843.0 t of CO_2	-86.1%	-90%
3[21]	130,548.5 t CO_2	-28%	-90%

In addition, as part of its Zero Net strategy, Atresmedia is committed to investing in GHG emissions absorption and removal projects for the remaining 10%; i.e., its residual emissions.

The decarbonisation levers identified by the Group and included in its transition are as follows:

FOSSIL FUEL CONSUMPTION REDUCTION AND FUEL SWITCHING

ENHANCED ENERGY EFFICIENCY

USE OF RENEWABLE ENERGY

VALUE CHAIN DECARBONISATION

NATURE-BASED SOLUTIONS: REFORESTATION

Atresmedia's transition plan primarily aims to reduce greenhouse gas (GHG) emissions, those produced in its daily operations from energy and fuel consumption, as well as emissions from its value chain. The plan does not involve replacing or changing its product portfolio, since its core business consists of the sale of advertising space, and content production and distribution. Therefore, there are no tangible products linked to its activities representing a significant source of greenhouse GHG emissions. However, the Group is actively working to reduce emissions associated with content production, making its content more sustainable and helping build a low-carbon audiovisual industry.

Investments to execute the transition plan are overseen by several departments within Atresmedia Group and, where necessary, are assessed by the Investment Committee. Most are carried out under Corporate General Management, although occasionally they depend on the actions and budgets of the various companies and divisions composing Atresmedia Group, e.g., such as Sustainability, General Services, and Infrastructure, among others. Atresmedia also has an objective of raising awareness in society about the importance of combating climate change and adapting to its consequences. Therefore, as a facilitator, it broadcasts sustainability-focused content across its television and radio channels, as well as on its Atresplayer platform and Canal Internacional. In alignment with the EU Taxonomy Regulation, Atresmedia considers these sustainability-related content initiatives in quantifying the proportion of its revenue, CapEx, and OpEx that contribute to this objective[22].

Atresmedia has continued to advance its plan by making investments that pursue the following objectives:

- Increasing the use of renewable energy
- Promoting sustainable mobility
- Improving waste management
- Enhancing energy efficiency across its facilities
- Enhancing Scope 3 emissions calculations
- Adapting infrastructure to improve climate resilience
- Assessing and enhancing the sustainability of audiovisual productions
- Raising awareness in society about the importance of combating climate change

[20] E1-3 lists the main climate change mitigation actions and E1-4 the GHG emission reduction targets.
[21] Scope 3 goals include all categories included in Atresmedia's Scope 3 (calculated) except category 11.
[22] Atresmedia does not have any coal, oil or gas-related economic activities.

En 2024, las principales inversiones y gastos llevadas a cabo han sido:

Location/Scope	Transition plan goal	Activity	Investment and expenditure (EUR)
Cero studios, offices and broadcasting stations)	**Enhancing energy efficiency across its facilities**	New transmitters	EUR 71,792.00
		New LED lighting	EUR 9,784.53
		New HVAC equipment	EUR 45,181.61
Actions at the headquarters in San Sebastián de los Reyes	**Enhancing energy efficiency across its facilities**	Renewal of refrigeration pipe insulation	EUR 11,415.25
		Replacement of HVAC systems	EUR 41,557.00
		Replacement of 35% of the audiovisual building's windows	EUR 83,908.49
		Renovation of set 1's hoists and LED lighting infrastructure	EUR 140,858.15
	Adapting infrastructure to improve climate resilience	Waterproofing of coverings	EUR 36,067.53
Cross-cutting actions spearheaded by the Sustainability Department	**Assessing and enhancing the sustainability of audiovisual productions**	Promotion of more sustainable audiovisual productions, measuring their carbon footprint and identifying sustainability measure to reduce their impact	EUR 8,000.00
	Promoting sustainable mobility	Carpooling project	EUR 4,500.00
	Enhancing Scope 3 emissions calculations	Project to identify measurements to enhance Scope 2 emissions calculations	EUR 8,936.5
Inversión total			**EUR 462,001**

Emisiones bloqueadas_

Additionally, Atresmedia conducted an internal assessment of potential locked-in emissions, concluding that emissions from the diesel consumption of the boilers supplying heating and domestic hot water (DHW) to Atresmedia's headquarters could jeopardise the achievement of Scope 1 and 2 decarbonisation targets, particularly over the long term.

The Group weighed the possibility of replacing its boilers with a less polluting alternative. However, it ultimately considered that this project was not viable because of the technical characteristics of the facilities where the boilers are located. Nevertheless, the Group will gear its efforts towards GHG emissions from other energy sources to deliver the targets of its strategy in the short term. It will also monitor developments in the market regarding available technologies to reduce locked-in emissions from its boilers. Furthermore, it will continue to enhance the energy efficiency of its buildings, potentially leading to a decrease in fossil fuel consumption for climate control.

Moreover, Atresmedia's Transition Plan is embedded in the Company's sustainability strategy. The Sustainability Department, overseen by Corporate General Management, allocates an item in the budget for implementation of the Sustainability Plan. Meanwhile, different Atresmedia Group areas (e.g., General Services, Infrastructures), also under the supervision of Corporate General Management, oversee the management and funding of other measures impacting the sustainability strategy.

The Group's Net Zero strategy and decarbonisation targets were approved by Atresmedia's Corporate General Management. The Sustainability Department executes this strategy, reporting on its development to the Corporate General Manager. Additionally, to ensure that Board members are kept informed of progress, the Corporate General Manager reports annually on the progress of the Net Zero strategy and the key actions implemented and planned for the future to the Audit Committee.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model_

Atresmedia has performed a climate physical risk assessment to identify the potential risks it could be facing as the first step of its resilience analysis. This analysis forms part of its operational resilience approach, focused on understanding and managing the identified physical risks. The Group has not yet performed a climate transition risk assessment[23] that incorporates climate scenarios and considers different time horizons. Atresmedia is committed to doing so in 2025.

In 2022, Atresmedia carried out its first climate change physical risk assessment, evaluating the exposure of all its assets to different physical climate risks, e.g., heat stress and extreme precipitation, in three climate scenarios: RCP 2.6, RCP 4.5 and RCP 8.5, and two time horizons: 2030 and 2050, aligned with the time horizons of its Net Zero strategy.

As a result of the assessment, Atresmedia identified four operational and financial risks arising from the physical impacts of climate change that could have consequences for its activity:

- **Negative effects on working conditions due to high temperatures:** high temperatures, heat waves and heat stress can make working conditions more arduous for Atresmedia employees.

- **Increased energy consumption:** an increase in the number of days with high temperatures, as well as temperature variance or heat waves, could lead to heavy energy consumption and push up costs.

- **Signal instability and communication interruptions:** variations in wind patterns and storms away from current typical values could lead to unstable signal conditions and communication outages.

- **Damage to assets:** floods, forest fires, heavy rainfall or storms could damage some of Atresmedia's assets, leading to an increase in repair and maintenance costs.

[23] *Atresmedia held internal workshops to identify climate-related regulatory, reputational and legal risks.*

Out of a total 240 of Atresmedia's assets, it analysed 175 at length with exposure to climate change physical risk factors classified as medium and extremely high. The main findings of the analysis were:

- None of the four identified risks presents high criticality for the Company.

- The likelihood of materialisation of these risks increases over the long term due to greater exposure in more extreme scenarios and longer time horizons.

After assessing these risks under the various scenarios and time horizons, the Group concluded that none represented a significant financial impact for the Company. Therefore, Atresmedia decided that it did not need to perform a strategic resilience analysis, since the identified risks were not material for the business given its low exposure to climate factors.

However, as a preventive measure, Atresmedia included these risks in its corporate risk map to monitor them and develop mitigation measures, including health and safety protocols to ensure the well-being of employees, along with support mechanisms for the broadcasting teams, making the Group less vulnerable to the climate risks identified.

As a result of the double materiality assessment and a preliminary analysis of climate transition risks, Atresmedia identified the following transition risks in addition to those identified in the climate change physical risk assessment:

Policy and legal

- **Climate regulation:** non-compliance with applicable climate change regulation or international agreements, or new environmental requirements for companies operating in Spain, coupled with the added difficulty of having to comply with new disclosure requirements, as well as increased investments to adapt Atresmedia's facilities and train staff, or even to engage the services of climate change experts, could pose a reputational or financial risk is they are not met.

Technology

- **Digital transition:** the digital transition—and the investment in technology to continue adapting to an ever-changing globalised world—could pose a risk to the Group by encouraging increased energy usage. This could have a negative impact on the Group by preventing it from delivering the Net Zero strategy, potentially incurring a reputational cost.

- **Digital carbon footprint:** the digital transformation could pose a risk through increased energy consumption and a higher content production and distribution carbon footprint.

Market

- **Resource availability and cost:** inflationary pressures and reduced energy and resource flows have increased costs and decreased the availability of raw materials, which could pose a risk for the Group.

- **Renewable energy:** purchasing 'green energy' from electric utilities entails an additional cost for the Group.

- **Sustainable audiovisual productions:** the lack of investment in sustainable audiovisual productions could pose reputational and financial risks, hindering achievement of the Net Zero strategy.

Reputation

- **Stakeholder expectations:** failure to meet the growing expectation among investors, customers and shareholders that Atresmedia will act positively and effectively to protect the environment and actively combat climate change through its services and products, while also implementing climate change strategies to minimise the impact, could pose a reputational risk that would likely impact the ability to attract new investments, customers and talent.

- **Net Zero pledge:** failure to deliver the Net Zero targets defined in 2022 would pose a risk for the Group, impacting reputation, investor interest and market share.

Additionally, Atresmedia has identified climate change opportunities for its business, as well as positive impacts for society, including:

- **Net Zero pledge:**

Positive impact: Atresmedia Group has policies and procedures in place to protect the environment and combat climate change.

Positive impact: Atresmedia's Net Zero pledge, coupled with the measures and initiatives developed to promote sustainable mobility, reduce fossil fuel consumption, and enhance energy efficiency, among others, contributes to reducing its environmental impact.

Opportunity: Atresmedia's commitment to decarbonising its operations could afford competitive advantages, for instance derived from savings in consumption through energy saving measures. Moreover, this commitment could improve access to finance.

- **Sustainable productions:**

Opportunity: Promoting the sustainability of its own and third-party audiovisual productions could provide an opportunity for Atresmedia to reduce its own and its value chain emissions and, accordingly, make progress on delivering its Net Zero strategy. Moreover, this type of project can provided added value to its audience.

Positive impact: Driving the sustainability of the audiovisual productions the Group generates and broadcasts would contribute to reducing their environmental impact.

Atresmedia has undertaken to perform a robust climate transition risk assessment, with climate scenarios and time horizons, in 2025. Based on the findings, the Group will assess the need to conduct an analysis on the level of operational and strategic resilience in relation to these risks.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities_

Regarding the process used by Atresmedia to identify material impacts, risks, and opportunities in relation to climate change, see disclosure requirement related to ESRS 2 IRO-1, which lists the four phases of the double materiality assessment: understanding, identification, assessment, and determination.

In the climate change physical risk assessment, in line with the comparative analysis and recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), Atresmedia selected the 2030 and 2050 timehorizons as key references, which are also the time horizons of its Net Zero strategy. The 2030 time horizon allows for the assessment of short-term risks and opportunities, reflecting the immediate impact of current policies and emerging trends. Meanwhile, the 2050 time horizon is aligned with global decarbonisation objectives, providing a strategic long-term perspective on climate change[24].

Moreover, three climate scenarios were analysed: **RCP2.6** (where mitigation efforts lead to a very low level of radiative forcing), **RCP4.5** (where the associated risk factors do not represent a relevant exposure for Atresmedia's assets) and **RCP8.5** (involving a very high level of GHG emissions). The scenarios considered cover all plausible climate threats, providing a robust framework for managing climate-related uncertainties.

The assessment process carried out was as follows:

1. **Asset screening:** out of the total of 240 assets considered for the assessment, 175 assets were selected for their consideration as having a medium, high and very high threshold due to their exposure to high physical risk factors. The tool used to gather location and climate data had global coverage and covered the Group's entire value chain. The spatial location ranged from 11 km to 150 km, depending on the location and the specific climate variable.

2. **Asset exposure:** the exposure of assets to 28 chronic and acute physical risks was assessed and the 11 most relevant risk factors for Atresmedia were selected. These included:

   - **Chronic:**
     - Temperature: changing temperature, heat stress, and temperature variability.
     - Wind: changing wind patterns.
     - Water: changing precipitation patterns and types.
   - **Acute:**
     - Temperature: heat waves and forest fires.
     - Wind: storms.
     - Water: drought, heavy precipitation and floods.

3. **Exposure assessment:** asset exposure to different risk factors in the different time horizons and climate scenarios was assessed.

4. **Effect of risks:** a conclusion was reached on how physical risk factors could give rise to operational and financial risks. The following four risks were considered material:

   - Negative impacts of high temperatures on working conditions
   - Increase in energy consumption
   - Signal instability and communication interruptions.
   - Damage to assets.

[24] *Atresmedia conducted its climate change physical risk assessment before publication of the CSRD. That explains why the Group only uses two time horizons, rather than the three required by the new directive. Considering the Company's climate strategy, the results of its climate physical risk assessment, and its low environmental impact, Atresmedia does not consider that it should extend its assessment to a third scenario.*

5 **Materiality assessment:** the materiality of risks was assessed. A risk was considered material when, given its likelihood of occurrence, it had the potential to significantly affect Atresmedia's operations or financial statements in the time horizons and scenarios assessed. The scales used were from 1 (extremely low) to 5 (extremely high) for likelihood of occurrence and impact on the Company. Atresmedia assessed the potential of each physical risk identified to significantly affect its operations or financial statements, considering:

- A qualitative assessment of risks.
- A quantitative estimate of the level of severity of each risk based on criteria of a specialist consultant, who took into account of different aspects, e.g., ability of the event to interrupt or alter Atresmedia's activity, the potential damage or the increase in maintenance requirements derived from the materialisation of a risk, or the scope of the affected area.

6 **Materiality threshold:** the materiality threshold was determined based on the high criticality level, corresponding to risks with a high or extremely high likelihood or impact and at least a medium value for the other metric. The assessment did not show any material risks, so it was concluded that no adaptation measures were required.

As noted previously, the Group did not conduct a climate transition risk and opportunity assessment considering, at least, a climate scenario in line with limiting global warming to 1.5oC. It also did not assess how its assets and business activities may be exposed to these climate events.

Notably, the climate scenarios used are consistent with the critical climate-related assumptions made in the financial statements. The FS indicate that no repair and maintenance costs were identified for the impairment of assets due to climate change-related issues, both in Note 2 Basis of preparation and consolidation and Note 17 Risk management policies of the consolidated annual financial statements for the year ended 31 December 2024, as well as in the 2024 consolidated management report under the section titled Main risks associated with the activity (see Notes 2, page 7, and Note 17, page 63 of the FS).

E1-2 Policies related to climate change mitigation and adaptation_

Atresmedia's Environment And Climate Change Policy (2024) is an update of the previous Environment Policy (2010) and applies to all Group companies. It outlines the commitments, principles and lines of action governing Atresmedia's activity in relation to respect for the environment, and climate change mitigation and adaptation.

As stated in the policy, Atresmedia's environmental commitment is reflected in its decarbonisation strategy and its climate transition plan, as well as by leveraging its power as a media to raise awareness in society, broadcasting across its communication channels environment-related news programs, reports, and awareness campaigns.

In addition, this policy, approved by the Corporate General Manager and updated in 2024, complements the General Corporate Responsibility Policy approved by the Board of Directors. Corporate General Management is responsible for implementation of the policy, which is led primarily by the Sustainability Department, with the support of other key areas, e.g., Infrastructures, General Services or Finance.

The policy addresses key issues, such as climate change mitigation and adaptation, as well as energy efficiency and the commitment to the use of renewable energy, setting out specific lines of action and commitments. Therefore, the Company is working to identify the climate change-related risks to which its activity is exposed, implementing measures to mitigate their effects on its operations and assets, and adapting to its consequences. Moreover, efficient energy use—one of its environmental objectives—translates into continuous implementation of energy efficiency measures in its operations and facilities, resulting in decreases in fuel and energy consumption.

Specifically, the policy addresses the following issues in relation to climate change adaptation and mitigation, energy efficiency, renewable energy deployment and regulatory compliance:

- Compliance with environmental regulations.
- Identification of climate physical and transition risks.
- Gradual fossil fuel consumption reduction.
- Removal of greenhouse gas emissions through offsetting and/or removal.
- Efficient energy use and commitment to using renewable energy sources.
- Correct management and minimise of waste and polluting substances.
- Responsible and rational use of natural resources.
- Advocacy of a low-carbon audiovisual industry.
- Relationships with suppliers.
- Environmental training and information to employees.
- Broadcasting news, education, and awareness content about climate change and its efforts to generate resilience on Atresmedia's channels.
- Voluntary adherence to initiatives that promote best sustainability practices.
- Reporting of environmental performance.

This document is available to stakeholders on Atresmedia Corporación's corporate website and outlines the following objectives:

E1-3 Actions and resources in relation to climate change policies_

In 2024, Atresmedia carried out a series of actions targeting climate change mitigation, climate change adaptation and the promotion of sustainable audiovisual productions through an initial pilot programme.

Climate change mitigation actions_

The main mitigation actions carried out by Atresmedia, classified by decarbonisation lever, are presented below:

Lever 1. Fossil fuel consumption reduction and fuel switching.

With the aim of making travel, both in its operations and along its value chain, more sustainable and lighter on greenhouse gas emissions, the Atresmedia Group endeavoured to reduce its fossil fuel consumption and switch to more sustainable fuels, as follows:

- Atresmedia's Business Travel Policy prioritises train travel over air travel.
- In 2024, Atresmedia set up a car pooling system so its employees can share a car when travelling to and from the workplace. This pilot initiative is subsidised by Atresmedia and aims to reduce greenhouse gas emissions associated with employee travel. The cost of implementing this scheme came to EUR 4,500.
- Installation of electric vehicle charging stations in employee car parks and company-subsidised charging facilities to champion sustainable mobility. The OpEx associated with these points stations amounted to EUR 3,500.04.
- Under the Company's flexible remuneration plan, Group employees can acquire a transport card offering tax relief. With this measure, the Group is looking to champion sustainable mobility and the use of public transport among its employees.
- The car leasing service available to company executives comprises zero emission vehicles only.
- Meanwhile, the supplier of chauffeur-driven vehicles offers an exclusive range of ECO and ZERO-labelled vehicles, which are either hybrids or plug-in hybrids.

Onda Cero also **carries out regular maintenance on the generator sets present at its broadcasting centres**, thus increasing their performance and reducing diesel consumption.

Last but not least, as a further measure linked to the lever of improving energy efficiency, Atresmedia expects to reduce the consumption of certain fossil fuels such as diesel used for heating at its headquarters. This will ultimately improve the energy efficiency and insulation of its facilities.

Thanks to these actions, Atresmedia succeeded in reducing its Scope 1 emissions from fixed installations and travel by 3.5% in 2024.

Lever 2. Enhanced energy efficiency.

The Atresmedia Group carried out the following actions in a bid to improve the energy efficiency of the equipment and technical installations present at its various locations and sites.

In 2024, Onda Cero's broadcasting centres and offices replaced various items of equipment, thus helping to make the Atresmedia Group more energy efficient while cutting down on greenhouse gases. Efforts are made to improve the day-to-day running of Uniprex, affecting various broadcasting centres and offices of Onda Cero throughout the country. Key actions carried out in 2024:

- **Transmitters replaced** with more efficient models, thus cutting energy consumption. These replacements were carried out at the Alicante, Baza, El Ejido, Granada, Zamora, Valdepeñas, Huéscar, Algeciras, Mérida and Murcia centres. The total investment and expenditure associated with this work came to EUR 71,792.

- **Replacement and preventive maintenance of all air conditioning equipment** at our stations, thus optimizing it and adjusting it to actual production needs, as well as the replacement of air conditioning systems at several stations with more efficient systems to cut down on energy consumption and CO2 emissions. The total CapEx associated with this action amounted to EUR 45,181.61. This CapEx is aligned with the Taxonomy exercise.

- **Replacement of conventional lighting in most of Onda Cero's studios and offices with LED technology,** thus improving energy efficiency at the facilities located in Elche, Pamplona, Lugo, Almería, Murcia, San Sebastián, Lérida, Infiesto, Tarragona, Cádiz, Jerez, Huelva, Córdoba, Alzira, Bilbao and Vitoria. The CapEx and OpEx associated with this action stood at EUR 9,784.53. This CapEx and OpEx is aligned with the Taxonomy exercise.

Meanwhile, the following actions were carried out under the oversight of Infrastructure, all of them taking place at the Group's headquarters:

- **Project to renovate cooling piping insulation (2023–2027).** Over the course of this five-year project, the existing insulation will be gradually replaced in order to reduce energy and heat loss by replacing the existing insulation with more efficient insulation. The CapEx associated with this action comes to EUR 11,415.25. This CapEx is aligned with the Taxonomy exercise.

- **Installation of air conditioning pump insulation.** Project to reduce heat loss from the pump bodies. The project was approved in 2023 and is being undertaken progressively between 2024 and 2025. The CapEx associated with this action comes to EUR 4,151.73. The associated CapEx is aligned with the Taxonomy exercise.

- **Replacement of HVAC systems.** Project approved in 2023 and carried out in 2023 and 2024. The aim was to replace air conditioning equipment that had become obsolete or to reinforce or ensure the redundancy of air conditioning in technical areas. The CapEx associated with this action comes to EUR 41,557.41.

- **Replacement of windows in one of the buildings located at Atresmedia's headquarters.** In 2024, the installation of thermal break windows began in this building in a bid to improve the building's insulation through the use of better quality materials. The project was approved in 2024 and 35% of it was completed over the course of the year. The CapEx associated with this action comes to EUR 69,150. This Capex is aligned with the Taxonomy exercise.

The Engineering department has been working to improve set installations, which sometimes results in extra energy savings. Notable actions in 2024:

- **Renovation of the lighting infrastructure of one of Atresmedia's sets,** specifically hoists and LEDs. This project generated energy savings by replacing the existing incandescent flood lights with LED lights and by making the lighting system more resilient, since uninterruptible power supply systems (UPSs) were incorporated to maintain the power supply in the event of power cuts or other outages. Completion of the project in 2024 resulted in a total CapEx of EUR 140,858.15. This CapEx is aligned with the Taxonomy exercise.

Thanks to the energy efficiency measures put in place at its facilities, Atresmedia expects to reduce the consumption of diesel fuel used to heat rooms and run processes. However, it is not possible to estimate the CO2 savings from these measures, as it will depend on the savings achieved through each of the actions.

Lever 3. Use of renewable energy.

With the aim of ensuring the rational use of natural resources and committing to renewable energy sources, Atresmedia has carried out the following actions:

- **Additional procurement of electricity from renewable sources.** Following successful contract renegotiations in 2024, there was an increase in the number of centres that consumed electricity from renewable sources. With this initiative, Atresmedia aims to reduce its market-based Scope 2 emissions. To drive forward this measure, the variable remuneration of executive directors was pegged to the percentage of electricity consumed from renewable sources, with the aim of having renewable consumption account for 95% or more of the total in 2026.

Thanks to the progressive purchase of electricity from renewable sources and self-consumption, Atresmedia will be able to achieve a sizeable reduction in its Scope 2 emissions. With the measures rolled out in recent years, a reduction of around 100 tonnes of CO_2 is expected in respect of the current figure generated for this scope. Since 2019, Atresmedia has achieved a 94.2% reduction in market-based Scope 2 emissions.

Lever 4. Value chain decarbonisation

With the aim of improving waste management at the San Sebastián de los Reyes headquarters and the Atresmedia and Onda Cero offices, the Group has embarked on its Zero Waste Project.

As part of the Atresmedia Group's waste management programme, during 2024 recycling points were set up at the Onda Cero radio stations and Atresmedia offices in order to improve the sorting of waste and, by having it recycled, to help reduce greenhouse gas emissions. This project includes the following key actions:

- **Management and recycling of the waste generated** at the San Sebastián de los Reyes headquarters and Atresmedia offices, by seeking to reduce the amount of waste destined for landfill and, by extension, the greenhouse gas emissions associated with the treatment of this waste.

- **Donation of surplus food** from the canteen at the San Sebastián de los Reyes headquarters to the Padre Alegre Cottolengo religious association. With this action, Atresmedia has reduced the emissions generated by surplus food waste. The Cottolengo also happens to be located close to Atresmedia's facilities, thus ensuring that the food arrives in optimal condition for consumption, while also doing away with the need for long journeys that would inevitably involve more fuel consumption and therefore more CO_2 emissions.

- **Staging of a charity market** in which employees can purchase clothes from Atresmedia presenters and collaborators at an affordable price, thus helping to reduce textile waste and promote the circular economy. Moreover, the money raised was donated to the Red Cross to support the victims of the flash floods.

- **Collaboration with the catering service:** Atresmedia works directly with its catering service provider in carrying out sustainability actions that directly affect Atresmedia. These include reducing the purchase of processed and frozen products by focusing its strategy on the purchase of fresh and local produce. As a result, fewer trips are made and less distance is travelled, thus cutting down on greenhouse gas emissions along the Group's value chain.

- **Prioritising the use of reusable and compostable materials** in the catering and cafeteria service, thus helping to reduce emissions associated with the recycling and treatment of these products.

Also in 2024, Atresmedia continued to target improvements in the calculation of its Scope 3 emissions, with the aim of reducing the quantity of estimated emissions and increasing the volume of emissions calculated with primary data. This measure is expected to help the Group identify effective measures to reduce the carbon emissions generated by its value chain. The cost of this action came to EUR 8,936.50.

Atresmedia will continue to deploy measures to reduce the carbon footprint of its supply chain in order to meet its Scope 3 emission reduction targets.

Lever 5. Nature-based solutions. Emission offsets.

Since 2023, Atresmedia has been stepping up its Net Zero strategy by investing in reforestation projects to partially offset its emissions. In 2024, the Group offset the fugitive emissions from the use of refrigerant gases for the air conditioning equipment (at a cost of EUR 5,289.5) and changed its supplier of refuelling services for Atresmedia's own vehicles, including a new contract to offset the emissions derived from fuel consumption.

The actions carried out for each decarbonisation lever and the scopes impacted in each case are as follows:

Decarbonisation lever	Action	Scope(s) affected
FOSSIL FUEL CONSUMPTION REDUCTION	Reduction of fossil fuel consumption in Atresmedia's own vehicle fleet.	Scope 1, mobile installations
	Atresmedia Business Travel Policy.	Scope 3, category 6
	Carpooling pilot project to reduce commuting to work.	Scope 3, category 7
	Transport card included as part of an employee's Flexible Remuneration Plan.	Scope 3, category 7
	Installation of charging stations for hybrid and electric vehicles in employee car parks, co-financed by Atresmedia.	Scope 3, category 7
	Improved maintenance of power generators to reduce diesel consumption.	Scope 1, fixed installations
IMPROVED ENERGY EFFICIENCY	Replacing existing HVAC equipment with more efficient technology that uses less polluting gases.	Scope 1, fugitive emissions Scope 2
	Replacement of LED lights and transmitters with more energy-efficient options, thus reducing energy consumption.	Scope 2
	Insulation of HVAC pumps.	Scopes 1 and 2
	Replacement of windows in audiovisual buildings.	Scopes 1 and 2
	Renewal of insulation for cooling pipes.	Scopes 1 and 2
USE OF RENEWABLE ENERGIES	Change of energy supplier contract, increased number of sites consuming electricity from renewable sources.	Scope 2
	Negotiations over the installation of photovoltaic panels at Atresmedia's headquarters.	Scope 2
SUPPLY CHAIN DECARBONISATION	Agreement with the catering service provider to donate leftover food from the canteen at the San Sebastián de los Reyes headquarters to the Padre Alegre Cottolengo religious association.	Scope 3, category 5
	Agreement with the supplier of leasing vehicles and chauffeur-driven vehicles to upgrade the fleet to 100% ZERO and ECO label vehicles.	Scope 3, category 8
	Improved calculation of Scope 3 emissions, to reduce the primary data and to be able to identify reduction measures along the supply chain.	Scope 3, category 1
	Progressive request for the carbon footprint of Atresmedia's suppliers of goods and services to be included in its Scope 3 emissions and to be able to identify improvements.	Scope 3, category 1
	Pilot project to produce more sustainable audiovisual productions with Atresmedia's production partners.	Scope 3, category 1
NATURE-BASED SOLUTIONS	Offsetting of fugitive CO_2 emissions through the purchase of emission allowances in a third-party reforestation project located in Galicia.	Scope 1, fugitive emissions
	Offsetting of CO_2 emissions from the trips made using Atresmedia's own vehicles.	Scope 1, mobile installations

As part of its transition plan, Atresmedia is continuing to identify measures to further reduce its greenhouse gas emissions and meet its decarbonisation targets. Along these lines, it has concluded that:

Climate change adaptation actions_

Actions carried out in relation to climate change adaptation are as follows:

- **Waterproofing of coverings.** Atresmedia embarked on a project in 2024 to make its physical assets more resilient to possible storms and intense weather conditions by improving the waterproofing of the roofs of the buildings and the water evacuation routes of the headquarters. The CapEx associated with this action comes to EUR 36,067.53.

- **Raising social awareness.** With the aim of helping society adapt to climate change, Atresmedia, through its different channels, broadcasts content that raises awareness of climate change and the need to urgently address its consequences. Key initiatives in 2024:

  - **Onda Cero**, through its sustainability initiative, *Luz Verde* (Green Light) Atresmedia's radio station has targeted environmental protection as a theme spanning all of its programming, with the aim of raising the profile of the need to fight climate change. In November 2024, a Committee of Experts for the initiative was set up, comprising leading figures from the world of environmental conservation. The Committee has been tasked with drawing up the roadmap and designing the actions to be carried out within the framework of Green Light.

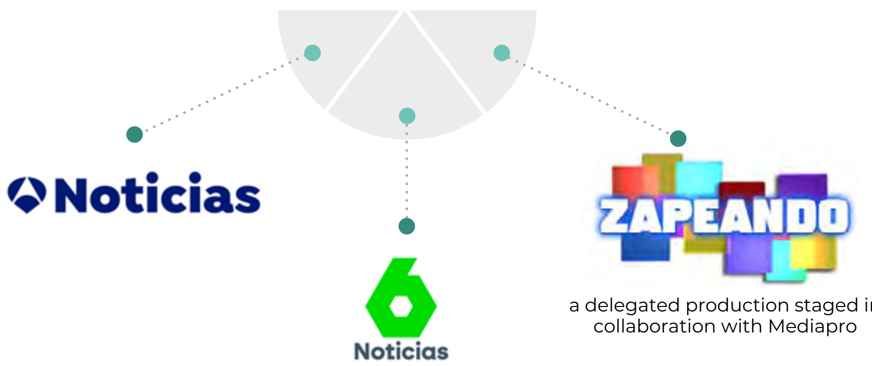
  - **Antena 3 Noticias**, has a specific section on Climate, Society and Culture to strengthen its commitment to outstanding news coverage relating to the planet and society.

  - **laSexta** has continued to broadcast news and special interest content on climate change in shows such as *Al Rojo Vivo, El Objetivo, Zapeando, Más Vale Tarde* and *La Roca*, and has continued to include energy transition and sustainability as one of the key themes in its *Metafuturo* event.

  - **Special coverage of weather events such as the flash floods:** Antena 3, laSexta and Onda Cero gave unprecedented news coverage in the immediate aftermath of the tragic flash floods that struck Valencia in late 2024. Through their television, radio, websites and social media channels, Atresmedia's news and current affairs teams succeeded in offering complete and factual coverage, while overcoming the logistical, technical and emotional obstacles in their path.

Promoting sustainable audiovisual productions_

In a bid to make its productions even more sustainable and to champion a low-carbon economy, in 2024 Atresmedia endeavoured to implement three pilot projects for more sustainable audiovisual productions. During the year, the Group worked to calculate the carbon footprint of three of its most emblematic productions and to diagnose and assess how sustainable each of them actually is. Atresmedia expects to have the final result of these projects in early 2025. The CapEx associated with these three pilot projects came to EUR 8,000, including:



a delegated production staged in collaboration with Mediapro

Actions moving forward[25]

Atresmedia also regularly plans for the future and fully expects to:

- Maintain active maintenance at all its facilities.
- Working alongside its waste manager, in 2025 is busy carrying out a study into the differential treatment of municipal solid waste with the aim of minimising the amount of waste going to landfill and therefore reducing the associated greenhouse gas emissions. This initiative is expected to require an investment by Atresmedia, although the amount has yet to be quantified.
- The **photovoltaic energy project at the headquarters of the Atresmedia Group** is pressing ahead. This project, which was approved in 2023 and remains in progress in 2025, involves the installation of photovoltaic solar panels on the roof of the company's buildings. With a power output of 280 kWp, this measure is expected to have a positive impact by reducing the Group's need to purchase power. The CapEx associated with this action is expected to be EUR 191,498.
- A scenario-based transition climate risk analysis is under way in 2025 to bolster the exercise conducted so far.
- The volume of Scope 3 emissions calculated with primary data is to be increased, meaning fewer estimates and further reductions.
- The Scope 1 emissions generated by Atresmedia's own vehicle fleet are being offset.

Available resources

For Atresmedia to be able to take action, it must have sufficient resources under the budget assigned to each area and department. However, continuous access to external financing is not required to proceed with all of the actions that the company has planned.

The Atresmedia Group is fully aware of the importance of using resources responsibly so as to ensure the sustainability of the environment. It therefore strives to minimise consumption and encourages and promotes reuse and recycling.

The consolidated amounts of CapEx in 2024 can be found in Note 6 "Other intangible assets" and Note 7 "Property, plant and equipment", while those relating to OpEx are set out in Note 18 "Revenue and expenses", specifically section d) "Other operating expenses" of the consolidated financial statements.

[25] *As Atresmedia does not have a significant environmental impact, it does not run the risk of systematically inducing significant negative impacts on the environment. As a result, there is no need to take corrective action.*

METRICS AND TARGETS

E1-4 Targets related to climate change mitigation and adaptation_

Atresmedia, within the framework of its Net Zero strategy, has set five goals[26] with the aim of helping to mitigate climate change, with two time horizons: 2030[27] and 2050. As mentioned earlier, base year (2019) emissions are for Scopes 1 and 2: 10,843.0 tCO_2 y para alcance 3: 130,458.50 tCO_2[28].

The emission reduction targets set by Atresmedia have been reviewed and validated by the SBTi initiative, which has confirmed that they will help to achieve the goal of limiting global warming to 1.5°C.

Notably, these targets also contribute to the effective management of certain material impacts, risks and opportunities:

Target 1: 86.1% reduction in combined Scope 1 and 2 greenhouse gas emissions by 2030 (target year) compared to the base year (2019).

This goal is directly related to Atresmedia's Net Zero objective and to the Group's pledge to reduce the use of fossil fuels and use renewable energy sources instead. As explained previously, this is an absolute emissions reduction target, based on science and validated by SBTi, which has determined that it is in line with a 1.5°C pathway

.

The target is expressed as a percentage reduction in CO_2 equivalent emissions compared to the base year and covers Scope 1 emissions from the use of fossil fuels in the Company's fixed installations, which mainly include gas, diesel and petrol, emissions from the use of refrigerant gases and emissions from the use of fossil fuels by Onda Cero's own vehicles (petrol and diesel), as well as market-based Scope 2 emissions from the use of electricity. This target covers 100% of the Atresmedia Group's Scope 1 and 2 emissions.

The greenhouse gases covered by this target are carbon dioxide (CO_2); methane (CH_4), nitrous oxide (N_2O) and various hydrocarbons.

Target 2: 28% reduction in Scope 3 greenhouse gas emissions expressed in tonnes of CO_2 equivalent to be achieved by 2030 (target year) compared to the base year (2019).

This goal is directly related to Atresmedia's Net Zero objective, to the Group's pledge to reduce the use of fossil fuels, lower its Scope 3 emissions, improve its waste management processes, and to its commitment to sustainable mobility and to the reduction of emissions along its supply chain. As explained earlier, this is an absolute emissions reduction target, based on science and validated by SBTi, which has determined that it is in line with a 1.5°C trajectory.

The target is expressed as a percentage reduction in CO_2 equivalent emissions with respect to the base year and covers emissions from Atresmedia's value chain, mainly emissions from purchased goods and services (category 1); energy use (category 3) and investments (category 15). This target covers 77.7% of the Atresmedia Group's Scope 3 emissions, as Scope 3 category 11 emissions are excluded.

This target extends to the following greenhouse gases: carbon dioxide (CO_2), methane (CH_4) and nitrous oxide (N_2O).

Target 4. 90% reduction in Scope 3 greenhouse gas emissions by 2050 (target year) compared to the base year (2019).

This goal is directly related to Atresmedia's Net Zero objective, to the Group's pledge to reduce the use of fossil fuels, lower its Scope 3 emissions, improve its waste management processes, and to its commitment to sustainable mobility and to the reduction of emissions along its value chain. As explained earlier, this is an absolute emissions reduction target, based on science and validated by SBTi, which has determined that it is in line with a 1.5°C trajectory.

The target is expressed as a percentage reduction in CO_2 equivalent emissions with respect to the base year and covers emissions from the Atresmedia value chain, including emissions from the purchase of goods and services (category 1); from capital goods (category 2) and from energy use (category 3); upstream transportation and distribution (category 4);

[26] Stakeholders have not been involved in setting the target and there have been no changes to the targets or the methodology for calculating Scope 3 emissions.
[27] In 2030 Atresmedia will consider the need to update its base year (2019) for its GHG emission reduction targets after each subsequent five- year period.
[28] The reference value on which the emission reduction targets are set includes all activities carried out by the Atresmedia Group. Those companies that account for less than 5% of the total are excluded. The reference value has the same scope as the complete footprint of the Atresmedia Group, with the exception of category 11, which has been excluded on the understanding that the Group has little c ontrol over the carbon emissions associated with viewing and listening to its content. However, in the interests of transparency, the Group calculates and reports its full footprint.

waste generated in own operations (category 5); business travel (category 6); employee commuting (category 7); leased assets (category 8) and investments (category 15). This target covers 77.8% of the Atresmedia Group's Scope 3 emissions, as Scope 3 category 11 emissions are excluded.

This target extends to the following greenhouse gases: carbon dioxide (CO2), methane (CH4) and nitrous oxide (N_2O).

Below we show Atresmedia's performance in fulfilling its objectives and targets under its Net Zero strategy since the base year.

Target 4. 90% reduction in Scope 3 greenhouse gas emissions by 2050 (target year) compared to the base year (2019)

This goal is directly related to Atresmedia's Net Zero objective, to the Group's pledge to reduce the use of fossil fuels, lower its Scope 3 emissions, improve its waste management processes, and to its commitment to sustainable mobility and to the reduction of emissions along its value chain. As explained earlier, this is an absolute emissions reduction target, based on science and validated by SBTi, which has determined that it is in line with a 1.5°C trajectory.

The target is expressed as a percentage reduction in CO_2 equivalent emissions with respect to the base year and covers emissions from the Atresmedia value chain, including emissions from the purchase of goods and services (category 1); from capital goods (category 2) and from energy use (category 3); upstream transportation and distribution (category 4); waste generated in own operations (category 5); business travel (category 6); employee commuting (category 7); leased assets (category 8) and investments (category 15). This target covers 77.8% of the Atresmedia Group's Scope 3 emissions, as Scope 3 category 11 emissions are excluded.

This target extends to the following greenhouse gases: carbon dioxide (CO_2), methane (CH_4) and nitrous oxide (N_2O).

Below we show Atresmedia's performance in fulfilling its objectives and targets under its Net Zero strategy since the base year.

Targets	Near-term objective (%) 2030	Long-term objective (%) 2050	Performance (%)				
			2020	2021	2022	2023	2024
Scopes 1 and 2	-86.1%	-90%	-70.9%	-99.94%	-72.32%	-79.6%	-80.0%
Scope 3[29]	-23%	-90%	-3.34%	+12.67%	+12.67%	+13.66%	+22.9%

Reference		Near-term objective 2030			Net zero objective 2050		
Scopes	Base year (2019)	Reduction (%)	Reduction (tonnes)	2030 emissions	Reduction (%)	Reduction (tonnes)	2030 emissions
Scopes 1+2	10,843.00	-86.1%	-9,335.82	1,507.18	-90%	-9,758.70	1,084.30
Scope 3	130,458.50	-28%	-36,528.38	93,930.12	-90%	-117,412.65	13,045.85

[29] *Category 11 greenhouse gas emissions are excluded from Atresmedia's Scope 3 objective.*

Target 5. To achieve 95% renewable electricity consumption by 2026 and above 93% each year until then

This target, expressed as a percentage, refers to the annual electricity consumption of the Atresmedia Group in its own operations. It therefore takes the current year as the base year. This commitment relates directly to Atresmedia's pledge to use energy from renewable sources. Within this broad commitment, there are various interim goals. Specifically, Atresmedia has pledged to ensure that at least 93% of its electricity comes from renewable sources in 2024 and 2025.

Year	Objective	Total electricity consumption MWh	Renewable electricity (GdO[30]) MWh	% of renewable electricity
2024	+93%	27,962.19	26,144.79	**93.5%**
2025	+93%	-	-	-
2026	95%	-	-	-

All the targets[31] have been set in-house and are reviewed annually at year-end. The Sustainability department monitors the progress made towards achieving each target.

E1-5 Energy consumption and mix_

Information is provided below on the Company's total energy consumption in its own operations, with a breakdown of consumption by origin: fossil, nuclear and renewable sources. The share of each type of energy in the overall energy mix is also shown.

Energy consumption and mix_

Atresmedia's energy consumption in 2024 stood at 33,742 MWh, of which 80.7% (27,217 MWh) came from renewable sources. This includes the electricity with renewable energy Guarantee of Origin that Atresmedia consumes (26,144.79 Mwh), as well as the share of renewable energy of the remaining electricity without a GoO according to the Spanish energy mix (59%), which amounts to 1,072 MWh.

2024	
Total energy consumption (MWh)[32]	Total (MWh)
Total energy consumption from fossil sources (MWh)	6,141.61
Share (%) of total fossil energy consumption	18.2%
Total energy consumption from nuclear sources (MWh)	383.47
Share (%) of consumption from nuclear sources to total energy consumed	1.1%
Total renewable energy consumption (MWh)	27,217
Fuel consumption for each renewable source, such as biomass, biofuel, biogas, renewable hydrogen (MWh)	N/A
Consumption of electricity, heat, steam and cooling from renewable sources (MWh)	27,217
The consumption of self-generated non-fuel renewable energy (MWh)	N/A
Share (%) of renewable sources (MWh)	80.7%
Total energy consumption (MWh)	**33,742.1**

[30] Renewable Guarantee of Origin.
[31] The reduction targets set by Atresmedia are gross targets and do not take account of the mitigation project financed through the purchase of carbon credits by the Group.
[32] The share of the Spanish energy mix was used to determine the proportion of electricity without a GoO that Atresmedia consumes.

E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions_

Set out below is information on total GHG emissions, including emissions generated directly by the Company's own operations and its upstream and downstream value chain. Additional disclosures are provided for an easier understanding of the data.

Gross GHG emissions in metric tonnes of CO_2[33]:

2024					
GHG emissions ($TnCO_2eq$)	Base year (2019)	2024	Objective 2030	Objective 2050	Annual % target/ Base year
Gross Scope 1 GHG emissions (tCO_2eq)	2,581.85	1,696.90	1,507.18	1,084.30	-80%
Gross market-based Scope 2 GHG emissions (tCO_2eq)	8,261.17	471.7			
Total Scope 1 and 2	**10,843.00**	**2,168.60**			
Gross location-based Scope 2 GHG emissions (tCO_2eq)	7,100.12	7,270.17		N/A	
Scope 3 GHG emissions					
Total gross indirect (Scope 3) GHG emissions (tCO_2eq)	**130,458.50**	**160,424.14**	93,930.12	13045.85	+22.97%
1. Purchased goods and services	78,313.90	92,246.86			
2. Capital goods	4,038.20	6,107.35			
3. Actividades relacionadas con combustibles y con la energía (no incluidas en los alcances 1 o 2)	1,893.80	342.72			
4. Upstream transportation and distribution	298	2,023.11			
5. Waste generated in operations	35.2	221.89			
6. Business travel	3,635.00	2,877.20			
7. Employee commuting	3,823.20	4,065.83			
8. Upstream leased assets	1458.8	2,853.78			
9. Downstream transportation	N/A	N/A			
10. Processing of sold products	N/A	N/A			
11. Use of sold products[34]	N/A	N/A			
12. End-of-life treatment of sold products	N/A	N/A			
13. Downstream leased assets	N/A	N/A			
14. Franchises	N/A	N/A			
15. Investments	36,963.10	49,685.40			
Total GHG emissions					
Total GHG emissions (location-based) (tCO_2eq)	140,140.30	169,391.04	N/A	N/A	
Total GHG emissions (market-based) (tCO_2eq)	141,301.50	162,592.74	N/A	N/A	

[33] *Atresmedia does not report GHG emissions from regulated Emissions Trading Schemes (ETS), as they do not apply to it.*
[34] *Atresmedia calculates carbon emissions from the use of products sold, but does not include them in its Net Zero strategy or related carbon footprint due to its inability to reduce them. These emissions amounted to 19,330 tCO_2eq in 2024 and are broken down in the annex to this Statement.*

Atresmedia's methodology for calculating GHG emissions

Atresmedia calculated its Scope 1 and Scope 2 carbon emissions using the most recent emission factors published by the Ministry for Ecological Transition and the Demographic Challenge as at the date of publication of this Statement. For its Scope 3 emissions, Atresmedia Group used a combination of CEDA and DEFRA emission factors.

Scope 1. Emissions associated with the use of fossil fuels at the Group's fixed installations. These were calculated multiplying natural gas and heating oil consumption by the corresponding emission factors.

Scope 2. Scope 2 emissions were calculated considering the organisation's total electricity consumption. Market-based emissions considered electricity consumed with Guarantee of Origin (GoO). The emission factor provided by MITECO was used for the rest of consumption and location-based emissions.

Scope 3. The methodology varied according to the methodology used to obtain the data and the source and quality of data used.

- Categories 1, 2, 3, 8 and 15 were calculated based on financial data, such as spend or expenditure, multiplied by the available emissions depending on the type of activity, service or good.
- Category 3 was calculated based on energy consumption not included in the previous categories.
- Category 5 was calculated by weight of waste, the treatment received and the corresponding conversion factor according to the type of waste and destination. The share of water consumption was also considered.
- Category 6 was calculated taking into account kilometres of distance travelled, as well as stays at national and international hotels. Each figure was multiplied by the corresponding emission factor in accordance with the mode of transportation (rail, air, car, taxi).
- Category 7 was calculated based on employee mobility data, which considered commuting, the type of commute, vehicle and fuel, and the kilometres of distance travelled.

The GHG emissions intensity related to these activities is as follows:

2024	
GHG emissions intensity (TnCO₂eq/currency used)	Total
GHG emissions intensity (location-based) (TnCO₂eq)	0.166
GHG emissions intensity (market-based) (TnCO₂eq)	0.159

Emissions intensity was calculated using total emissions generated as the numerator and total revenue for 2024 (see Note 18 (a) of the FS) as the denominator.

E1-7 GHG removals and GHG mitigation projects financed through carbon credits_

As part of its decarbonisation strategy, Atresmedia is committed to reducing its Scope 1 and 2 and Scope 3 emissions by 90% and to neutralising the remaining 10% (i.e., its residual emissions) by investing in CO_2 removal projects.

In 2024, as explained in section E1-4, in line with its Net Zero strategy, Atresmedia began offsetting equivalent CO_2 emissions from fugitive emissions. These offsets are not used to achieve the GHG emission reduction targets.

During the year, Atresmedia offset **165 tCO_2eq of 2023 fugitive carbon emissions**. This offset was achieved via investment in the Galicia Rexenera: Lapa Furada reforestation project in the city of Vigo registered in the Carbon Footprint, and the Carbon Dioxide Offset and Removal Projects Registry of the Ministry for Ecological Transition and the Demographic Challenge (MITERD). This gave Atresmedia 165 tCO_2eq worth of emission rights. By signing the agreement, the project owner committed to maintaining the offsets awarded to Atresmedia over a 30-year period.

In 2025, Atresmedia will offset the fugitive emissions of its 2024 carbon footprint. Carbon credits from that tCO_2eq removal project are from biogenic sinks.

Set out below are the total emissions offset through the mitigation project in which Atresmedia participated:

Carbon credits cancelled in 2024	
Total TCO_2eq	165
Share from removal projects (%)	100%
Share from reduction projects (%)	0%
Recognised quality standard: MITERD (%)	100%
Share from projects within the EU (%)	100%
Share from carbon credits that qualify as corresponding adjustments	N/A

E1-8 Internal carbon pricing scheme_

Atresmedia Group does not currently have an internal carbon pricing scheme. Therefore, the additional disclosure related to this requirement is not applicable.

E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities_

According to Annex C of ESRS 1 (i.e., the List of phased-in Disclosure Requirements), for this year Atresmedia will not include the quantification of the anticipated financial effects from physical and transition risks. The Company may omit this information in the first year of preparation of the Sustainability Statement. Moreover, the Group may report only qualitative disclosures for the first three years. Additionally, Atresmedia will not provide details on the effects considered or the critical assumptions used to quantify the anticipated financial effects.

3 Social information_

3 Social information_

ESRS S1

3.1 OWN WORKFORCE

The Atresmedia Group views the proper management of people and their talent as being key to the success of its business, as they are one of its most prized assets. It therefore pays close attention to its workforce and responds to their interests and needs. Within the framework of its Human Resources Policy, Atresmedia endeavours to: provide stable employment and a rewarding work environment; ensure that human and labour rights are respected in the relationship between the Group and its employees; encourage and foster the professional development of its employees, on the understanding that investing in training generates value for both parties; seek out and attract the best talent; promote equality, diversity and work-life balance; and ensure a safe and healthy working environment by creating a safe and respectful working environment for everyone.

STRATEGY

ESRS 2 SBM-2

Interests and views of stakeholders_

Atresmedia knows that people are a company's main asset and value. It knows that excellence in people management can set a company apart from its peers over time and be the key to its success. Atresmedia's Human Resources strategy focuses on people and on attracting and retaining talent, on the clear understanding that proper management is essential for a business to be sustainable and to be able to meet other strategic priorities. At Atresmedia, the executive team proposes lines of action based on their knowledge of the business and on the prevailing trend within the wider sector looking ahead, which is closely considered when pursuing the business strategy.

The **Atresmedia Group also listens to the interests and opinions of its employees** and factors them in when dealing with certain issues related to the business, such as collective bargaining agreements, or when making improvements to working conditions. To succeed, it implements different communication mechanisms, including the following:

1. **Working and co-creation sessions.** For instance, in 2023 the Group held a working session to gather the main concerns of its employees, resulting in the **IRIS** (rapid implementation initiatives). Some of the measures identified in this project were implemented throughout 2024. Similarly, a representative portion of the Group's employees were directly involved in the Company's first **double materiality assessment**, the results of which were relied on when drawing up this Sustainability Statement.

2. **Surveys.** Moreover, **regular surveys are conducted to help understand what our employees think** in relation to various matters. This includes psychosocial interviews about their jobs, mobility surveys about their travel habits, satisfaction surveys about the training provided, or volunteering surveys to learn more about their social concerns. The results of these surveys are used to make decisions on issues that directly affect Atresmedia's employees.

3. **Smooth relations with workers' representatives.** To help Atresmedia genuinely understand the interests and opinions of its employees, it ensures **a fluid, practical and close relationship** with the workers' representatives, aligned with the collective bargaining agreement and seeking to offer a rapid and consensual solution that safeguards the interests of both parties. Lastly, Equality and LGTBI Harassment Prevention Plans have been drawn up in close collaboration with the various works councils. The plans are available on the Company's Intranet and are there to support the interests and opinions of specific stakeholder groups.

Although the Group does not currently have direct consultation mechanisms in place to ascertain the interests and opinions of non-employee workers, it ensures at all times that their human and labour rights are respected by signing contractual clauses with their direct employers. When it comes to occupational health and safety, the Group ensures that all work is suitably coordinated so that they can carry out their activities safely.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model_

The double materiality assessment carried out by the Group in 2023 identified the issues related to Atresmedia's own workforce, along with the most material risks, impacts and opportunities for its business. This analysis took due account of the different types of employees with whom the Group interacts, the different countries and regions in which it operates, and the different activities it carries out.

All the impacts, risks and opportunities flagged derive from Atresmedia's own business model and from recognising the importance of its own personnel as the Company's main asset. Atresmedia, through its human resources management and occupational health and safety strategy, integrates into its business model aspects such as well-being, occupational health and safety, diversity, equity and inclusion, the protection of human and labour rights and the protection of personal data, among other matters.[35]

In relation to the Atresmedia Group's own workforce, the following categories of workers could be broadly[36] affected by the material impacts identified in the assessment:

EMPLOYEES

made up of people hired directly by the different companies of the Atresmedia Group and who are covered by one or other of the collective bargaining agreements in effect

NON-EMPLOYEE WORKERS

which can be further broken down as follows:

Workers hired through a temporary employment agency

who provide a service to the Company and whose working conditions are governed by law, being equal or referenced to the conditions of the Group company at which they provide their services.

Self-employed/freelance workers

who carry out work on an ad-hoc basis for Atresmedia's various companies. In this case, the conditions of each worker depend on their own business circumstances and on the terms of the contract they sign with the Company.

[35] *The above issues relate to the following sub-topics of ESRS S1: working conditions, equal treatment and opportunities for all and other labour rights inherent to the working environment. The relationship between Atresmedia's own topics and the sub-topics of the ESRS can be consulted in the section ESRS 2 SBM-3 of this Statement.*

[36] *All the negative impacts are considered to be Group-wide, as they have the potential to affect a large group of own staff and are not limited to specific individual cases. It has been identified that workers working at heights may be at greater risk of suffering an accident.*

The impacts, risks and opportunities for each material topic related to the Atresmedia Group's own workforce are as follows:

	IROs	DESCRIPTION	POLICIES
	Well-being, occupational health and safety		
POSITIVE IMPACT	Policies and measures targeting working conditions	Atresmedia has various policies and measures in place to create a safe working environment and to improve the well-being and work-life balance of its employees.	· General Corporate Responsibility Policy · Human Resources Policy · Collective bargaining agreements · Equality plans
NEGATIVE IMPACT	Differences in the working conditions of employees.	The employees of the various companies that make up the Atresmedia Group are subject to different collective bargaining agreements, which can lead to significant differences in the wage conditions among employees. However, the Atresmedia Group endeavours to ensure that all employees are able to enjoy the work-life balance measures and employee benefits under similar conditions.	
OPPORTUNITY	Improving upon the minimum conditions of collective agreements	Atresmedia strives to improve upon the minimum terms set out in the collective bargaining agreements of its employees, especially those subject to less beneficial conditions. It also continues to promote measures to improve the work-life balance of its employees.	
POSITIVE IMPACT	Health and Safety Management System	Atresmedia has an Occupational Health and Safety Management System certified under the ISO 45001 standard which, together with its policies and procedures, ensures the sound management of occupational safety. This system also broadens the traditional focus on physical health to include issues such as mental health in order to further enhance the well-being of its employees.	· Health and Safety Policy · General Corporate Responsibility Policy
POTENTIAL RISK	Occupational accidents	The Atresmedia Group has identified certain occupational risks associated with the professional activities carried out by its employees, especially in those jobs exposed to specific risks, such as working at heights, and which are therefore inherently more dangerous.	
POTENTIAL RISK	Non-compliance with OHS legislation or failure of safety measures	The Group has identified that, despite the controls and mechanisms in place, failure to comply with the law governing occupational health and safety or failure to implement health and safety measures and mechanisms could result in fines.	
	Engagement with and impact on the community		
POSITIVE IMPACT	Social initiatives for employees	Atresmedia's corporate volunteering programme and the implementation of other awareness-raising initiatives (talks and workshops) are beneficial for the Group's employees, enabling them to understand first- hand the difficulties faced by different segments of society and build values such as empathy.	· General Corporate Responsibility Policy
POTENTIAL RISK	Non-compliance with the general disability law	The Group has identified that there is a risk of non- compliance with the General Law on Disability (2% of profiles with some form of disability) due to the difficulty in finding suitable professional profiles to fill the openings on offer, especially at some of its companies.	

	IROs	DESCRIPTION	POLICIES
	Diversity, equity and inclusion		
POSITIVE IMPACT	Creating a diverse and inclusive work environment	Through awareness-raising initiatives, diversity training and the commitment to hiring profiles with disabilities, and thanks to mechanisms such as harassment protocols, Atresmedia ensures that it generates a genuinely diverse and inclusive working environment.	· General Corporate Responsibility Policy · Human Resources Policy · Diversity, Equity and Inclusion (DEI) Policy
OPPORTUNITY	Increasing workforce diversity ratios	Atresmedia has the opportunity to further increase the diversity of its workforce, especially among its administrative and management teams.	
POTENTIAL RISK	Non-compliance with labour legislation	Failure to comply with current or future labour laws, such as those relating to diversity on management bodies or building accessibility, could result in financial penalties for the Group.	
	Data protection		
POSITIVE IMPACT	Ensuring the protection of personal data	Atresmedia has a Privacy Model to guarantee the protection of personal data. It also delivers awareness events and specific training to improve the management of the personal data of its employees and protect them from possible attacks or incidents.	· Privacy Policy for Employees
POTENTIAL RISK	Failures in data protection mechanisms	Atresmedia is aware that any failure in its Privacy Model or in the control mechanisms in place could lead to data leaks and fines.	
	Human and labour rights		
POSITIVE IMPACT	Human and labour rights- oriented policies	Atresmedia has various policies that illustrate the Group's firm commitment to protecting the human and labour rights of its workers.	· General Corporate Responsibility Policy · Atresmedia Code of Conduct · Human Resources Policy · Diversity, Equity and Inclusion Policy · Due Diligence Handbook
POTENTIAL RISK	Non-compliance with employment law or failure in the protection measures	Any serious non-compliance with applicable labour regulations and frameworks, such as those of the ILO, could constitute a breach of the labour rights of the company's own staff, such as the right of association.	

Despite being a non-material topic for Atresmedia, the Group discloses that there are risks associated with the relationship with the non- employee workers present among its workforce.

In order to increase the positive impacts, minimise the occurrence of risks and seize opportunities, the Group carries out numerous actions related to the management of its workforce, as described in section S1-4 of this Statement.

Furthermore, despite having a transition plan with ambitious decarbonisation targets, there is no risk that the measures implemented by the Group to comply with its Net Zero strategy will result in job losses or other relatively significant impacts on its own staff.

Broadly speaking, the material risks and opportunities[37] detected affect all Atresmedia employees, regardless of whether they belong to a specific group. However, certain job positions carry additional risks (e.g. different level falls, heat stress or night shift work), meaning that the workers who perform those jobs may be more exposed to occupational risk than other workers.

Lastly, it should be noted that as a result of the Human Rights Due Diligence process carried out in 2023, where the main risks associated with human and labour rights were identified and assessed, Atresmedia did not detect any operations that carry significant risks of forced, compulsory or child labour.

GESTIÓN DE INCIDENCIAS, RIESGOS Y OPORTUNIDADES

S1-1 Policies related to own workforce_

Atresmedia, in line with its commitment to people, has various policies, a corporate code of conduct and other documents governing relations with its workforce, with the Human Resources Policy being the framework document when it comes to people management.

Human Resources Policy_

The **Human Resources Policy** (2010), updated in 2024, sets out the principles and commitments guiding the management of Atresmedia's human capital and enshrines the values on which the Group's Human Resources strategy is based: focus on people, teamwork, communication and pride in belonging. The policy applies to all salaried employees of the Group, including those of its subsidiaries and of Fundación Atresmedia. The document describes the lines of action and principles related to people management, orienting them to help achieve the corporate purpose: *We believe in the power of reflection and emotion to generate a society of shared values:*

Principles and lines of action of the Human Resources Policy

1. Providing stable employment and a rewarding working environment
2. Fostering and promoting the professional development of our workforce.
3. Attracting and retaining talent.
4. Upholding human and labour rights, in accordance with prevailing legislation, the 10 principles of the Global Compact and the provisions of the ILO.
5. Promoting diversity, equity, inclusion and work-life balance, for which it also has a specific **Diversity, Equity and Inclusion Policy.**
6. Ensuring a safe and healthy work environment.

The Human Resources Policy also explicitly states the Group's refusal to tolerate any form of child, compulsory or forced labour, as well as human trafficking, with this commitment extending to all workers who provide services to Atresmedia, whether hired directly or through a third party. The policy likewise sets out the Group's refusal to tolerate any type of discrimination on the grounds of gender, race, sexual orientation, religious beliefs, political opinions, nationality, social origin, disability or any other circumstance that could be a source of discrimination.

Diversity, Equity and Inclusion Policy_

The **Diversity, Equity and Inclusion (DEI) Policy, which applies to all Group employees (2024)**, lays the foundations for ensuring a diverse and inclusive working environment that guarantees equal opportunities and non-discrimination among all the people who form part of Atresmedia now or in the future. It ensures that all of them are able to unlock their full potential and recognises the value and richness that diversity brings to the Group, In terms of human capital, the policy includes commitments and principles aimed at:

[37] *Most of the risks and opportunities derive from previously identified impacts.*

- Building a diverse and inclusive working environment that guarantees diversity, equity and inclusion, and respect for everyone regardless of their condition, gender, race, sexual orientation, religious belief, political opinion, nationality, disability or any other characteristic.

- Ensuring a safe, free and non-judgemental working environment, striking the right balance between personal and professional life.

All these commitments and principles are aligned with prevailing legislation and with the United Nations Principles, as well as with the International Labour Organisation (ILO) mandate on gender equality and its recommendations on diversity, as well as the CNMV recommendations on gender equality and other key reference documents.

Both the **Human Resources Policy** and the **Diversity, Equity and Inclusion Policy** have been approved by the Corporate General Manager with the aim of developing and complementing Atresmedia's **General Corporate Responsibility Policy**, as approved by the Board of Directors. The Human Resources Department, which reports to Corporate General Management, is tasked with enforcing the Human Resources Policy and the Diversity, Equity and Inclusion Policy.

General Corporate Responsibility Policy_

The **General Corporate Responsibility Policy** (2010), approved and updated by the Board of Directors in 2021, sets out Atresmedia's Corporate Responsibility strategy, along with all related commitments and principles of action, including:

- Supporting employees as the Company's most prized asset

- Transmitting the corporate policies and values all along the value chain

- Building transparent relations with stakeholders

The policy also sets out Atresmedia's commitment to the uphold and promote the human rights enshrined in the Universal Declaration of Human Rights and the different national and international conventions and declarations signed by Spain, and its pledge to ensure compliance with the provisions of the International Labour Organization (ILO), especially those related to the privacy of its employees or the work of minors.

The three aforementioned policies are published on the corporate website of the Atresmedia Group and are made available to employees through the Group's intranet.

Health and Safety Policy_

Meanwhile, the **Health and Safety Policy** sets out the basic health and safety principles underpinning the **Occupational Health and Safety System of the Atresmedia Group.** This policy, approved in 2020 by the then CEO of the Company following consultation and participation of the OHS officers, applies to all salaried employees of the companies of the Atresmedia Group, and to any other components of the company's workforce. However, the health and safety obligations are different for each type of own personnel (salaried, self-employed and temporary staff), in accordance with the provisions of Law 31/95 on the occupational health and safety. The Atresmedia Group's policy is widely disseminated so that it is known to all employees. It is also posted on the corporate intranet and is made available to other stakeholders as and when needed.

The Joint Occupational Health Service, which reports to Corporate General Management, is responsible for ensuring that the Occupational Health and Safety Policy is regularly updated and made known across all levels of the organisation.

Privacy Policy for Employees_

When it comes to the privacy of its own employees, Atresmedia has a Privacy Policy for Employees, thus fulfilling its duty to inform stakeholders about the processing of their personal data and the rights to which they are entitled.

Some of the above policies address specific groups of people, such as:

- **People with disabilities: by promoting their recruitment and ensuring their integration into the labour market under similar conditions to other employees.**
- **Women: favouring gender equality, not tolerating any form of harassment and protecting motherhood in particular.**
- **Minors: promoting their protection and rejecting any form of child labour.**
- **People belonging to the LGBTI community: refusing to tolerate discriminatory practices in the workplace and creating specific plans for their integration.**

Aside from its raft of policies, the company has other mechanisms in place to achieve its objectives, especially in relation to the above-mentioned groups of people.

Meanwhile, several Group companies have approved and filed their equality plans, with the aim of achieving effective equality between women and men, while eliminating gender discrimination and creating a healthier work-life balance. The Group's Equality plans also include a **Maternity, Pregnancy and Breastfeeding Protection Guide** and a **Protocol against sexual and gender-based harassment**, both of which are available on the corporate intranet.

Aside from the aforementioned plans, the Group has approved five protocols against LGBTI harassment, aimed at achieving equality for trans people and guaranteeing the rights of LGBTI people, in accordance with the provisions of Spanish Law 4/2023. Both the Equality Plans and the Protocols against sexual and gender-based harassment and LGBTI harassment have been negotiated with the workers' representatives and approved by the respective Negotiating Committees, with part representation from the company and part from the workers' representatives.

Code of Conduct_

Atresmedia's **Code of Conduct** is the bedrock of its Compliance Model and sets out the basic principles regulating conduct within the Group, these being compliance with the law as the basis for ethical conduct and an absolute commitment to respect human rights when running the business. The provisions of the Code are applicable and must be complied with by all Group employees. Moreover, all other workers linked to Atresmedia's activities are expected to respect and act in accordance with the principles described therein. The Board of Directors is responsible for directing and supervising effective compliance with the Code and for adopting and implementing the necessary measures for its coordination with the other regulatory and procedural elements of corporate governance. It also makes sure that it is regularly updated and improved.

Among its basic principles of behaviour, the Code of Conduct includes the Company's express commitment to respect, protect and comply with the UN International Bill of Human Rights and Guiding Principles on Business and Human Rights and with the European Charter of Human Rights, which enshrines the protection of personal data as a fundamental right.

Furthermore, and as explicitly stated in the Code, Atresmedia brings its resources to bear in ensuring compliance with the provisions of the International Labour Organization (ILO), especially those related to the elimination of discrimination and the promotion of freedom of association and the right to collective bargaining. Along these lines, it will not abide any practices that run contrary to Spanish labour legislation or to the principles championed by the ILO. It also refuses to tolerate any form of child or forced labour.

To be able to spot any conduct that runs contrary to the provisions of the Atresmedia Code of Conduct, as well as any breaches of human or labour rights, the Group has a Whistleblowing Channel in place, which can be contacted by any Atresmedia employee. In addition, the Code of Conduct describes the measures in place to provide redress for incidents arising from breaches of the Code of Conduct, as described below.

S1-2 Processes for engaging with own workers and workers' representatives about impacts_

Atresmedia has various channels of communication in place in order to build and maintain a close and collaborative relationship with its employees. Due to the way these channels are configured, they afford it a broad and in-depth vision of the needs and interests of its employees. This collaboration serves as a basis for decisions and actions to manage impacts on its employees.

Atresmedia's main channels of collaboration with its salaried employees are:

- **Leadership-based collaboration: from managers to employees.** The Atresmedia Group is committed to building a close leadership style, predicated on trust and the rapid and effective resolution of problems. To make this happen, there is a continuous and direct relationship between employees and the Company's senior and middle management teams, who are tasked with managing and channelling information bi- directionally between the Company and its workers. These managers transmit the needs and suggestions that arise on a day-to-day basis, resolving them directly or relaying them to the relevant areas of the Group. Moreover, Human Resources continuously monitors the Company's activities, visiting the different sites and dealing directly with managers to gain first-hand knowledge of the status of personnel and spot possible concerns.

- **Collaboration with works councils.** One of the most important processes of collaboration between the Group and its employees takes place with their representatives. Works councils are up and running at each Atresmedia Group company to look after the interests of their respective employees. Atresmedia collaborates with all of them on an ongoing basis, focusing the dialogue on efficiency and proximity when resolving problems. The Atresmedia Group has signed agreements with the works councils of all Group companies the type and size of which warrants the existence of a council. The only exception is Atresmedia Smart Tools, whose employees were hired by the Atresmedia Group in 2024 and with whom negotiations are already at an advanced stage.

  The various agreements provide for meetings between the two parties on a quarterly or half-yearly basis. However, with the aim of maintaining a close, fluid and effective dialogue, Atresmedia takes a highly collaborative approach by meeting with the workers' representatives whenever any relevant issue arises and as often as necessary to resolve problems and reach agreement in an effective manner. Negotiated agreements are passed on to employees by both their representatives and the company itself.

  To ensure also that the interests and opinions of all its employees are listened to, and in accordance with current legislation, Atresmedia negotiates the terms of its collective bargaining agreements with the works councils, as well as the terms of its equality and LGBTIQ plans and, further down the line, those of its mobility plans. It is also quick to engage and liaise with them to resolve any differences that may arise between its own interests and those of its employees, including any material impacts that may affect them. These agreements are aligned with the principles and commitments set out in the Group's corporate policies, as described in section S1-1.

  Under the terms of the agreements signed with the workers' representatives, and as mentioned earlier, Atresmedia conducts regular psychosocial studies of its employees in order to gauge their satisfaction. The results of these assessments are used to build new action plans.

- **Direct collaboration through different tools** Atresmedia has various internal communication channels for interacting with its employees and communicating matters that affect them directly. This includes news relating to the Company's business model and activities, employee perks and benefits, their rights and obligations, and more besides. These tools are there to ensure continuous collaboration with employees and include the following:

- Newsletters such as the Corporate Responsibility or Human Resources newsletter, where information is shared on the Group's main social and environmental actions, including the corporate volunteering programme, donation campaigns and sustainable mobility measures, perks and benefits for employees and other corporate news. These communications take place constantly throughout the year.
- Corporate intranet and a3mia platform. Where employees can find information of interest, including corporate policies, promotions, premières and Group success cases.
- MASDIII internal magazine, published monthly, offering information on various topics of interest.
- Specific communications from different departments containing information of interest to employees, including matters relating to privacy, compliance, etc.

Atresmedia also held quarterly meetings throughout 2024 with the different Health and Safety Committees that the Group has. It also held half-yearly meetings with those companies that do not have OHS Officers. The Corporate General Manager, with the support of the Human Resources Department, is ultimately responsible for overseeing effective collaboration between employee representatives and the Group.

The Group also addresses all points of concern raised by employees through the committee and psychosocial risk surveys (similar to organisational climate studies), by drawing up action plans that are shared with the works councils.

Workforce members who may be particularly vulnerable

Atresmedia, aware that some of its own staff may be particularly vulnerable, establishes measures to ensure that they are able to work in the same conditions and with the same assurances as everyone else within the organisation.

In view of the requirements of Law 39/1999 on work-life balance, and Royal Decree 1251/2001, as well as Organic Law 3 /2007, on effective equality between men and women and in accordance with the Occupational Health and Safety Act (Law 31/1995), and in the psychosocial risk assessment, the Atresmedia Group takes into account the following groups that may be particularly vulnerable:

Particularly sensitive workers (including people with disabilities): the Sustainability, Human Resources and Occupational Health and Safety departments work together to ensure that these people receive the necessary training and that their workplaces are adapted to enable them to carry out their professional activities successfully.

Minors: where minors carry out work for Atresmedia, any modification in their working conditions is reported to the Occupational Health and Safety department so that it can review their risk assessment and adopt the necessary protective measures.

Pregnant workers and maternity leave: when carrying out the occupational risk assessment, Atresmedia considers the risks associated with workers who are pregnant, have recently given birth or are breastfeeding. There is a specific document titled "Risks and preventive measures – Maternity and Breastfeeding" available on the Group's intranet. In addition, and as mentioned earlier, the Group's Equality Plan includes a Maternity and Breastfeeding Guide (approved by the Equality Committee), which sets out the obligations that Atresmedia must honour to ensure the protection of maternity, pregnancy and breastfeeding.

Atresmedia also identifies, by carrying out risk assessments of the jobs (for salaried employees and for non- employee workers arranged with temporary employment agencies), those risks that are inherent to the job itself (such as working at heights or heat stress) in order to establish the necessary protection measures so that these people can carry out their work safely. In the case of self-employed workers, Atresmedia, in accordance with the Occupational Health and Safety Act, only asks them to be aware of the risks of the activities they carry out and requires them to possess the relevant preventive training when there are special risks involved.

S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns_

As mentioned earlier, Atresmedia has the Whistleblowing Channel as the main and priority channel for reporting breaches of the internal regulations of the Group's Compliance Model and any unlawful acts or omissions that might directly affect, or undermine, the public interest or involve a human rights abuse. More precisely, the channel may be used to report instances of harassment at work, sexual harassment, discrimination, matters relating to worker health and safety and other rights, among other matters.

For work-related issues that do not involve breaches of regulations and do not constitute harassment in the workplace, the Group has other channels of communication which its employees may use, including the human resources mailbox, the OHS mailbox and the corporate responsibility mailbox. To improve the management of incidents handled, in 2023 Atresmedia implemented an Internal Reporting System that covers the entire Group and the Atresmedia Foundation, including the management of the Whistleblowing Channel. An Internal System Officer was also appointed to manage communications received through the channel. This task is carried out through a new tool provided by an external supplier, which features all the required functionalities and security safeguards.

Once a communication or report is received, it is sorted accordingly and the Compliance Officer decides whether it should be processed, rejecting those communications that are unfounded or have been made in bad faith (which

may also give rise to sanctions). If the information, while not strictly relevant for the channel, is useful to the Group, the reporting person is notified of the decision and the matter is passed on to the competent area or department. If admitted, an acknowledgement of receipt is sent within seven days and an investigation team is deployed and given 60 days to collect evidence while maintaining due levels of confidentiality.

Following the investigation, an action plan is drawn up to correct, mitigate and prevent any irregularities that may have been identified. The Compliance Officer assesses and draws up a report containing their conclusions and proposals for action, and decides whether the case should be continued or closed. Lastly, once the relevant steps have been taken, the file is closed and all actions and decisions duly documented. The reporting person is notified of this circumstance, while ensuring confidentiality and respect for the rights of all those involved in the case.

Salaried employees of the Atresmedia Group also receive training on the Compliance Model. This training includes specific content on the Whistleblowing Channel, thus ensuring that all Atresmedia employees are aware of the Group's internal regulations and the main channel for reporting breaches. All Atresmedia's own personnel can use this channel confidentially or anonymously through a tool available on the Group's corporate website, along with the related user manual and Privacy Policy. While Atresmedia does not formally assess the extent to which its employees trust these mechanisms, it has found that the number of queries received through the channel has increased, which could well mean that they do indeed place more trust in it.

Group employees are also free to use the Intranet suggestion box and the various active mailboxes managed by human resources in order to voice their concerns and opinions regarding labour issues and their rights as Group employees.

Lastly, the Company does not tolerate any form of retaliation against users of the Whistleblowing Channel. Furthermore, the protocols in place against gender-based harassment approved by the Group include whistleblower protection mechanisms and expressly prohibit any reprisal against whistleblowers, or against any person who participates or collaborates in the investigation into the circumstances reported. For more information see ESRS G1 Disclosure Requirement G1-1.

S1-4 Taking action on material impacts on own workforce, and approaches to managing risks and pursuing material opportunities related to own workforce, and effectiveness of those actions_

In 2024, the Atresmedia Group carried out various actions to prevent negative impacts[38] and risks, to promote positive impacts on its workforce, and to pursue opportunities in this regard.

Atresmedia takes positive action to comply with current legislation on employment matters, generate a positive impact on the people who make up the organisation and ensure decent working conditions, fair and equitable remuneration, as well as equal opportunities and non-discrimination. It also promotes the mental and physical health of its own workforce. Notably, the Group focuses on the following aspects: employee well- being, training, health and safety, data protection and privacy, and personal development and inclusive talent.

Diversity, equity and inclusion_

In 2024 Atresmedia made further efforts to strengthen its commitment to diversity, equity and inclusion among its workforce. To succeed in this task, it took further steps in addition to those taken by the Group in previous years, including:

- **Diversity Plans:** in 2024 the Atresmedia Group negotiated and signed with the workers' representatives the **first six LGBTIQ plans** for the companies of Atresmedia Corporación, Atresmedia Tech, Antena 3 Noticias, Uniprex and Uniprex Televisión. It also registered Uniprex Televisión's equality plan.

- **Raising awareness of diversity, equity and inclusion:** to mark the occasion of Diversity Day, Atresmedia employees were invited to attend a **talk titled "Unconscious biases; making the invisible visible"**, where they reflected on issues such as diversity, the influence of biases in personal interactions, self-recognition and the importance of practising inclusive leadership. The cost of this action came to EUR 1,800.

[38] No steps were taken to mitigate the negative impact of the existence of different collective bargaining agreements, given that each worker must be covered by the collective bargaining agreement that corresponds to their job and line of activity, even this could lead to differences in working conditions among the Group's workers.

- **The corporate volunteering programme:** in a bid to bring its employees closer to the realities faced by different social groups, the Group continued to promote its corporate volunteering programme throughout the year. Atresmedia employees worked alongside organisations such as Mariana Allsopp, Pequeño Deseo, Aldaba or PROCLADE on various initiatives, including international volunteering in Kenya with children in extreme poverty, regular collaboration with a soup kitchen in Madrid or reading clubs for the elderly, along with ad-hoc activities to support an animal shelter and a home for people with intellectual disabilities, This brought them closer to the tough living conditions faced by certain groups such as those living in extreme poverty, women at risk of inclusion, people with disabilities and homeless people. Overall, a total of **444 volunteers spent 2,497 hours on these worthy causes.** In 2024, the Atresmedia Group invested EUR 16,989 in its volunteering programme.

- **Capaz Grants Project:** this project aims to help improve the employability of people with disabilities by offering them financial aid to pursue courses through Atresmedia Formación. Since the project was launched in 2020, a total of 220 grants have been awarded to people with disabilities, enabling them to receive training on Atresmedia courses. In 2024, a new entity, Eurofirms, joined the project, in which Fundación Universia, Randstad, Integra and Capacis are already collaborating. This project also allows Atresmedia to spot professional profiles that might be good fits for job openings within the company.

- **Renewal of the Diversity Charter:** Atresmedia renewed, for yet another year, its commitment to the Diversity Charter by pledging to comply with its ten principles on diversity, equity and fair treatment, as a further show of its desire to continue implementing policies that promote an inclusive, respectful and discrimination-free working environment.

- **Inclusive selection processes and adaptation of job positions:** the Sustainability and Human Resources departments continued to work together to promote inclusion and diversity in recruitment processes. Atresmedia has been busy adapting workplaces for those who need it, thus ensuring that all employees are able to work under equal conditions. Moreover, a total of six job positions were adapted in 2024.

- **Agreements with organisations for social inclusion:** in 2024, the Atresmedia Group signed an agreement with the organisation Confederación Salud Mental España, thanks to which, in 2025, our news journalists will receive specific training on the right way of portraying on television people with mental health problems. In addition, thanks to its collaboration with the Integra programme run by the Fundación Integra, Atresmedia supports the employment of women who are victims of gender-based violence, offering them the opportunity to pursue professional internships at various Group companies. In 2024, two people benefited from this project.

- **Diversity outreach:** in 2024, as part of the communication process of raising awareness of the new A3mia platform, employees were reminded via email that they are free to let the Company know of any disability they may have, with the aim of bringing out disability within the organisation.

- **Renewal of collective bargaining agreements**: Atresmedia renegotiates collective agreements to adapt them to new needs and circumstances.

Worker well-being_

Atresmedia has been working for years to enhance the well-being of its employees by taking positive action to further improve its people management processes, increase employee satisfaction and allow them to achieve a healthy work-life balance, as well as their physical and mental wellness.

- **Creation of the Atresmedia platform:** one of the main projects carried out in 2024 in the realm of people management was the deployment of A3mia, a software solution enabling better management of employees, optimising team management by unifying processes between Atresmedia companies and providing easy access to data for talent management, among other benefits. The recruitment process was also optimised in 2024 and the Group onboarding process was launched. This initiative has streamlined the procurement process through the digitalisation and automation of processes, the creation of databases and alert systems, among other positive outcomes.

Pursuing these actions cost the Group EUR 620,000, including the acquisition of the product, the implementation of the system and the deployment of support staff throughout the process.

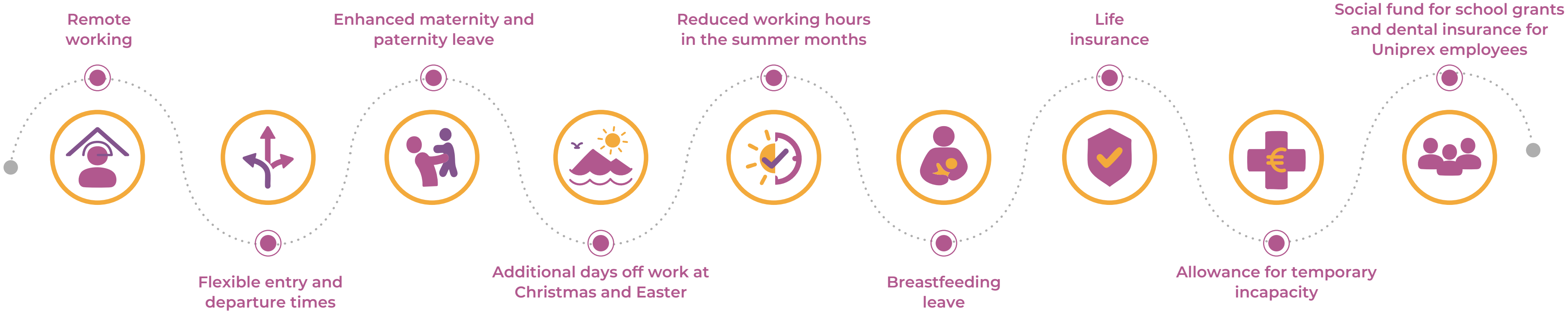
- Another key project in the period was the process of drawing up **job descriptions and assessments**, to provide clear definitions of the responsibilities, duties and skills associated with each position and to identify the key positions at all the Group's companies. A **Skills Dictionary was created** as part of this process, setting out the hierarchical and functional relationships and associating a value with each job position. This helps to ensure the grouping into "jobs of equal value" and compliance with prevailing labour regulations. The budget for this action amounted to EUR 34,970.

In 2024, the Group continued to offer its employees a range of **perks and benefits to improve their well- being:**

- Flexible Remuneration Plan: including medical insurance, transport card and childcare voucher.
- Canteen service, with part of the cost met by the Group.
- Well-being programme: featuring sessions on personal growth, nutrition or mindfulness, among others, aimed at improving the physical and mental wellness of employees.
- Gympass service: co-financed by Atresmedia.

EIn 2024, Atresmedia Group employees[39] continued to enjoy **improvements in their working conditions** under various corporate collective bargaining agreements, notably including:

IMPROVEMENTS IN THEIR WORKING CONDITIONS



[39] *The implementation of these measures sometimes depends on the needs of the job and the terms of the relevant collective agreement.*

Training_

The Group has a lifelong training plan in place to promote the professional development of its employees. The plan is based on a flexible and specialised model targeting both common and specific aspects of the professional activities carried out across the Group. All Atresmedia employees receive training, regardless of their profile or level, and the content of certain subjects may be adjusted to suit the profiles of certain employees or executive positions.

In 2024, the training focused on improving knowledge of artificial intelligence among all Company profiles. This training plan is taking place in phases. Phase I was completed in 2024 and involved training talks with experts to raise awareness among the teams. The general and area-specific training to acquire new skills, or strengthen existing ones, will continue during 2025 with Phase 2 of the plan. Atresmedia, fully invested in the development of its employees, offers a wide array of training programmes tailored to their interests and needs. These include programmes such as "Master The Power" for technical and specialised training, certifications through Udemy courses, and communication skills workshops given by experts from the chain. The Group also promotes learning in cross-cutting areas through platforms offering courses on equality, sustainability, cybersecurity and workplace well-being, as well as webinars focused on mental health.

The Group's annual expenditure on training came to around EUR 500,000. This amount includes the payment of licences, face-to-face training such as in artificial intelligence, and virtual training in English, among other subjects. Atresmedia also provides various spaces for training events, including eight training classrooms and various sets or function rooms for those activities that require them.

In 2024, more than 2,600 employees were asked to complete a broad range of training actions, with a completion rate of more than 60%, representing a follow-up of more than 31,000 hours of training. Notably, these training courses achieved a score of 9.3 out of 10 in terms of quality, according to the evaluation questionnaires handed out by Fundae (State Foundation for Employment Training).

One of the most important processes when it comes to training is supporting the employee by regularly following up on their training. This is done through communications inviting those who have been asked to attend courses to provide feedback or through direct calls to resolve questions or encourage them to complete their training.

At the end of the courses, the follow-up process is completed and the results are recorded in Atresmedia's own employee database and submitted to Fundae, in accordance with applicable requirements. In 2024, subsidised training amounted to EUR 176,319.16.

Each course or programme provides proof of the knowledge obtained through diplomas or certificates issued by leading providers or by the training area for those employees who complete more than 75% of the hours.

Health and safety_

The Atresmedia Group strongly believes that occupational health and safety relating to its business is a key part of people management and that, for this reason, it must endeavour to achieve a safe and healthy working environment for all the people who, in one way or another, provide it with services, focusing on minimising risks.

Atresmedia's Occupational Health and Safety Management System is based on the requirements of the ISO 45001 standard.

Each and every year, the Atresmedia Group's Health Service draws up a preventive activity plan setting out all the health and safety actions to be carried out during the current year. This planning is agreed upon with the employees' representatives and approved by Corporate General Management. On a quarterly basis, the Health Service and Corporate General Management monitor the actions and report to the various Health and Safety Committees.

In 2024, the Occupational Health and Safety and Medical Services department of the Atresmedia Group continued to pursue projects to further improve its work in ensuring health and safety. The main projects planned and implemented in 2024 were as follows:

- **Occupational risk assessment:** AAtresmedia carried out an occupational risk assessment for the two companies that joined the Joint Occupational Heath Service in 2024, namely Atresmedia Smart Tools and Wayna Aero, as well as two new work centres following their relocation. The risk assessment of 63 Group workplaces (TV stations and offices) was also updated, with 397 deficiencies detected and duly resolved. The economic value of this action amounts to EUR 13,600.

- **Audit of the Occupational Health and Safety Management System:** the Group's Management System, which includes various commitments and core principles relating to occupational health and safety, underwent a voluntary external audit during the period. This audit was carried out by Audelco and enabled Atresmedia to successfully renew its ISO 45001 certification, at a cost of EUR 6,350 for the Group.

- **Assessment of psychosocial factors:** the assessment of psychosocial factors was carried out for a total of 950 employees of the Uniprex and Atres Advertising companies using the FPSICO 4.1 method of the National Institute for Safety and Hygiene at Work (Instituto Nacional de Seguridad e Higiene en el Trabajo). The assessment included a voluntary and confidential questionnaire, followed by a series of personal interviews. The findings were used to draw up the new Action Plan, which sets out the corresponding preventive measures and will have a positive impact for the salaried employees of these companies. The cost of this assessment came to EUR 6,000.

- **Training in OHS:** the initial training course in occupational health and safety, featuring updated content, was given to all new employees of the Group's companies belonging to the Joint Occupational Health Service. Meanwhile, the new OHS Officers received the necessary training for their role. Also in 2024, basic training in the prevention of electrical risks was delivered to 80 workers of the company Uniprex, and four workers of Atresmedia Corporación received specific training in working at heights and handling lifting platforms.

- **Monitoring of environmental conditions:** in 2024, environmental conditions were monitored at the San Sebastián de los Reyes headquarters and at the offices and sites of other Group companies.

- **Annual health surveillance campaign:** as is customary, the annual health surveillance campaign for salaried employees was carried out in the last quarter of the year. This campaign, which has a clearly positive impact on employees, cost a total of EUR 132,000.

- **Meetings with the Health and Safety Committees:** in 2024, quarterly meetings were held with the various Health and Safety Committees of the six Group companies that have such a committee. As for those companies without an OHS officer, in 2024 the Joint Occupational Health Service met with all of them every six months to keep them informed of any relevant issues related to the health and safety of their employees.

- **Defibrillator maintenance:** Atresmedia carries out regular preventive maintenance of its defibrillation equipment to ensure its proper functioning in the event of an emergency. This activity entailed a total cost of EUR 4,680 in 2024.

- **Checks of metering equipment:** Atresmedia conducts annual checks of the lux meters and thermo- anenometers present in its installations to check the reliability of the results. These important devices measure lighting levels, temperature, relative humidity and CO2. The cost associated with this action came to EUR 400.

- **OHS consultancy:** Atresmedia arranged the services of companies specialising in OHS in 2024, to receive advice on various matters related to health and safety, at a total cost of EUR 8,490.

- **Medical Care Service:** Atresmedia offers its employees a permanent medical care service, located at its headquarters in San Sebastián de los Reyes. This measure has a clearly positive impact on the Group's employees. This service is outsourced at a total cost of EUR 265,221.

Also in 2024, Atresmedia's Occupational Health and Safety and Medical Services department planned and carried out various projects with the aim of complying with the actions set out annually in the Preventive Activity Plan and honouring its commitments under the Occupational Health and Safety Policy. Meanwhile, to monitor all actions and set goals, the Occupational Health Service relies on a control panel featuring measurable and quantifiable indicators. It is used to control the proper functioning of all health and safety processes.

Last but not least, the Occupational Health and Safety Management System includes a specific incident management procedure for investigating and logging any injury or health concerns affecting the employees of the companies that are adhered to the Joint Occupational Health Service. Self-employed workers are asked to report any accidents/incidents sustained when performing any contracted work. In the case of temporary employment agencies, the subcontracted company is responsible for managing any incidents that occur, including the duty to investigate and bring the matter to the attention of the Atresmedia Group.

As head into 2025, the Occupational Health and Safety and Medical Services department plans to carry out the following actions:

- Conducting a study of psychosocial factors at the companies Antena 3 Multimedia and 6 y M Producciones.

- Delivering a basic life support course on semi-automatic defibrillation.

- Giving a course in first aid.

- Reviewing the Occupational Health and Safety Policy.

- Conducting an ISO 45001 audit and regulatory audit of the companies Atresmedia Corporación de Medios de Comunicación, Uniprex, Antena 3 Noticias, Atres Advertising and Antena 3 Multimedia.

Data protection and employee privacy_

The Group makes regular communications to offer its employees practical tips on how to protect personal data and to explain the penalties that can be incurred due to bad practices. Atresmedia also sends out an annual reminder to its employees about the existence of the Company's Data Protection Model, including a specific mention of the Privacy Policy for employees and the contact details of the Data Protection Officer.

A data protection audit was also conducted for the onboarding and recruiting processes carried out within the Group, at a total cost of EUR 7,500.

The company also gave specific training on how to protect personal data when telling the news, with a total of 254 attendees.

Monitoring and evaluating the effectiveness of the actions taken_

The Group continuously monitors the actions it undertakes in order to gauge the degree of achievement or success. Each area follows up on the actions it pursues. For instance, the Human Resources department monitors collective bargaining and training plans; the Occupational Health and Safety and Medical Services department tracks key health and safety indicators to monitor its actions; and the Sustainability department continuously monitors the volunteering programme, sending satisfaction surveys to participants after each activity and conducting an internal evaluation survey among its own employees once every two years or thereabouts.

Resources available for managing impacts, risks and opportunities_

Atresmedia has specialised staff assigned to various areas, such as Sustainability, Medical Services and Occupational Health and Safety, Internal Audit, Legal Services and Human Resources, all of whom manage those aspects associated with their department's activities. These teams include specialists in occupational health and safety, business ethics, privacy, disability and other issues. Acting on the instructions of the corresponding general department, these areas determine the technical, human and economic resources they wish to allocate to the management of each matter that falls within their remit.

Atresmedia also has several specialised committees (Health and Safety Committee, Sustainability Committee, Compliance Committee) comprising representatives from various corporate areas, thus ensuring that the most pressing issues can be dealt with from a Group-wide perspective.
Moreover, the different corporate divisions responsible for impacts, risks and opportunities in their areas work hard to minimise the occurrence of any negative impacts.

The consolidated amounts of CapEx during 2024 are disclosed in Note 6 "Other intangible assets" and Note 7 "Property, plant and equipment", while relating to OpEx are discussed in Note 18 "Income and expenses", specifically section d) Other operating expenses, of the consolidated financial statements.

METRICS AND TARGETS

S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities_

Atresmedia has a set of targets associated with the broader objectives of its policies and action plans. However, these targets have not been defined in relation to a specific base year, and nor do they have quantitative parameters for compliance, nor a fixed time frame for their achievement. Moreover, no deadline has been set for achieving them, although Atresmedia fully intends to do so in due course.

The actions undertaken by Atresmedia are aimed at:

- Multiplying the positive impact on its employees.
- Managing actual and potential negative impacts on its own employees.
- Managing risks and opportunities related to its own employees.

The main targets related to the different objectives are described below:

Improving work-life balance_

- Making steady progress in implementing remote working arrangements, while complying with the provisions of each collective bargaining agreement.

Employment and inclusion of people with disabilities_

- Increasing the number of people with disabilities within Atresmedia's workforce, with such individuals accounting for at least 2% of the workforce.

Diversity, equity and inclusion_

- Having equality plans and harassment protocols for all Group companies to which they apply.
- Increasing the percentage of women in senior management.
- Increasing the number of young profiles within the company.

Training and development_

The Group will continue to expand its training programmes to develop and hone key skills among its employees. Atresmedia aims to closely monitor and track its training actions and to keep the quality indicators at around 9 out of 10, according to the self-assessment questionnaires handed out by Fundae.

Initial training in occupational health and safety and planning of OHS activities_

Every year, as part of continuous improvement, the Joint Occupational Health Service sets OHS objectives and targets, which undergo quarterly monitoring. More precisely, two annual OHS objectives with associated targets have been set for 2025:

Objective 1. Preliminary training in occupational health and safety. Two main targets have been set to assess the achievement of this broader objective:

Target 1. **Monitor training indicators on a monthly basis.** This target has a deadline of December 2025 and is monitored on a Boolean basis (complete/not complete).

Target 2. **Hold meetings with those departments who have employees/trainees not trained in ORP off work on sick leave.** This target has a deadline of December 2025 and is monitored on a Boolean basis (complete/not complete).

Objective 2. Monitor the planning of preventive activity for radio stations and TV stations. Two main targets have been set to assess the degree of achievement of this objective.

> Target 1. **Review the planning of preventive activity for radio stations and TV stations.** This target has a deadline of February 2025 and is monitored on a Boolean basis (complete/not complete).

> Target 2. **Create a Workflow on the Group's Intranet so that the heads of the work centres can monitor the planning of preventive activity.** This target has a deadline of March 2025 and is monitored on a Boolean basis (complete/not complete).

In addition, the Atresmedia Group remains firmly committed to bringing young people into its workforce through the Group's scholarship programme. The aim is also to offer competitive working and employee conditions in the industry.

S1-6 Characteristics of the undertaking's employees_

The following information shows the key characteristics of the Atresmedia Group's employees, all of whom are located in Spain:[40]

2024	
Gender	**Number of employees (headcount)**
Men	1,266
Women	1,400
Other	0
Not reported	0
Total employees	**2,666**

The following breakdown shows the number of employees by contract type and gender:

	2024				
	Men	Women	Other	No disclosed[41]	Total
Number of employees (headcount)	1,266	1,400	-	-	**2,666**
Number of permanent employees (headcount)	1,164	1,261	-	-	**2,425**
Number of temporary employees (headcount)	102	139	-	-	**241**
Number of employees on non-guaranteed hours (headcount)	0	0	-	-	**0**
Number of full-time employees (headcount)	1,250	1,376	-	-	**2,626**
Number of part-time employees (headcount)	16	24	-	-	**40**

Atresmedia had a total headcount of 2,562 in 2023. In 2023, a total of 2,268 employees were permanent, of whom 2,234 were full-time and 34 part-time, while 189 employees were temporary.

The number of employees who left the company in 2024 includes instances of voluntary redundancy, dismissal, retirement or death.

2024	
	Total
Nº of employees who have left the company	186
Employee turnover rate	6.98%

As for the methodology used, the numerator is the total number of employees who have left the company while the denominator is the total number of employees at the end of the year.

The average number of employees in 2024 is disclosed in Note 18 of the consolidated financial statements.[42]

[40] Note that Atresmedia does not include executive directors as salaried employees.
[41] Hereinafter, the breakdown by gender will only be made between men and women as Atresmedia does not have any employees falling under the categories of "Other" or "Not disclosed".
[42] It should be noted that the average number of employees in 2024 presented in this Statement does not match the figure provided in the consolidated financial statements. This is because the latter count the executive directors as employees but not the employees of Fundación Atresmedia, while this Statement does the opposite.

S1-7 Characteristics of non-employee workers in the undertaking's own workforce_

In accordance with Appendix C of ESRS 1 (list of information requirements introduced gradually), Atresmedia will not disclose information on non-employees in the current financial year, given that the Company may choose not to disclose such information for the first year in which it prepares its Sustainability Statement.

S1-8 Collective bargaining coverage and social dialogue_

In 2024, 89% of employees were covered by collective bargaining agreements, either company-specific or sectoral, with the remaining employees being management personnel. Meanwhile, eight Atresmedia Group companies have Works Councils, representing a total of 1,954 employees at those companies.

2024			
	Collective bargaining coverage		Social dialogue
Coverage Rate	Employees – EEA	Employees – Non- EEA	Employees – EEA
0-19%	-	-	-
20-39%	-	-	-
40-59%	-	-	-
60-79%	-	-	Spain
80-100%	Spain	-	-

En 2023, el 90% de los asalariados estaba cubierto por convenio colectivo.

S1-9 Diversity metrics_

Information on the gender distribution of the Group's senior management and the distribution of its own employees by age group is presented below:

2024					
	Nº			%	
	Women	Men	Total	Women	Men
Gender distribution within senior management	3	11	14	21.4%	78.6%

In 2023, the Company's senior management comprised 12 members, of whom 10 were men and two were women.

2024				
	Under 30	30 - 50	Over 50	Total
Distribution of employees by age group	496	1,374	796	**2,666**

In order to provide comparative information, the data for the year 2023 regarding the distribution of employees have been restated on the basis of the age groups required under the ESRS.

In 2023, the distribution of employees by age group was as follows: 449 employees under 30 age; 1,380 employees between 30 and 50; 733 employees over 50.

S1-10 Adequate wages_

All Atresmedia employees receive adequate wages in accordance with prevailing national legislation.

S1-11 Social protection_

All Atresmedia Group employees are covered by social protection, through public programmes/benefits offered by the Company, against loss of income due to major life events, such as illness, unemployment from the time the employee starts working at the Group, accidents at work and acquired disability, parental leave, and retirement, in accordance with Spanish legislation.

S1-12 Persons with disabilities_

The following tables present information relating to own employees with some form of disability within Atresmedia's workforce

2024	Men	Woman	Total
N° of people with some form of disability among its employees	36	22	58
% of employees with disabilities	2.18%		

In 2023, Atresmedia had 54 people with disabilities among its employees (2.1%).

S1-13 Training and skills development metrics_

In line with its commitment to its own workforce, the Group provides training to its employees to help them develop and hone their skills. Set out below is information on the training and professional performance initiatives that Atresmedia provides to its own employees:

2024	Managers		Technical staff		Administrative staff		Other	
	Mujer	Hombre	Mujer	Hombre	Mujer	Hombre	Mujer	Hombre
Average number of training hours per employee and by gender	12	12	14	11	17	16	8	9

S1-14 Health and safety metrics_

The following table shows the extent to which Atresmedia's own employees are covered by its health and safety management system, while also showing incidents of absenteeism, accidents and illnesses and days lost among the Group's employees.

2024	N°	%	Rate
% of employees covered by the health and safety management system	-	100%	-
Fatalities as a result of work-related injuries and work-related ill health	0	-	-
Fatalities of value chain workers if they are working on the Group's sites.	0	-	-
Accidents suffered by own employees	41	-	8.82%
Cases of work-related ill health (employees)[43]	859	-	-
Days lost among employees	29,504	-	-

In 2024, all accidents reported to the mutual society were included as recordable work-related accidents, including accidents with and without sick leave, while commuting and not while not commuting.

S1-15 Work-life balance metrics_

Atresmedia provides information below on the extent to which its employees are entitled to and make use of family-related leave, including information on the Group's work-life balance metrics for 2024.

2024	Men	Woman	Total
Percentage of employees entitled to take family-related leave	-	-	**100%**
Percentage of entitled employees that took family-related leave	4.7%	3.9%	**4.28%**

In 2023, a total of 84 people exercised their right to take family-related leave (3%), of whom 33 were men and 51 were women, representing 1% and 2% respectively.

[43] *This includes all cases of employees who took sick leave in 2024 (as logged by the mutual society), whether due to a work-related accident or non-work-related contingency (temporary incapacity).*

S1-16 Remuneration metrics (pay gap and total remuneration)_

Below we disclose information on Atresmedia's remuneration metrics, including aspects such as the gap in pay between male and female employees and the difference between the remuneration they receive and that paid to the highest paid individual in the Group.

Percentage pay gap by employee category		
Employee category	2023	2024
Senior management	27.2%	36.92%
Managers	13.6%	21.12%
Middle managers	8.1%	8.02%
Technicians	8.3%	7.88%
Administrative staff	3.5%	0.47%
Other	1.9%	-2.53%
Total	26.2%	24.04%

Ratio between the remuneration of the highest paid individual and the median remuneration of all other employees	
Total	42

The sizeable pay ratio between the highest paid individual and the median of all other employees is due to the fact that the remuneration of several people at the Group has a dual component: as a worker and as a personality with an artistic role.

S1-17 Incidents, complaints and severe human rights impacts_

The following tables disclose information on work-related incidents and/or complaints, as well as severe human rights impacts with regard to Atresmedia's workforce. This includes aspects such as cases of discrimination and human rights incidents.

- N° Total number of incidents of discrimination, including harassment: 0.
- Number of complaints filed through the channel by staff members: 5.
- Total number of severe human rights incidents: 0.

In 2024, four complaints of workplace harassment and one of sexual harassment were received through the Whistleblowing Channel, all of which were handled following proper procedure and protocol, and the appropriate investigations were launched.

3 Social information_

ESRS S2

3.2 WORKERS IN THE VALUE CHAIN

Atresmedia's value chain is defined as the full range of activities, resources and relationships related to the undertaking's business model and the external environment in which it operates. This encompasses the activities, resources and relationships the Group uses and relies on to create its products or services from conception to delivery, consumption and end-of-life.

Workers in the Atresmedia value chain are those who operate upstream and downstream in the value chain, as well as those who carry out their activity at the Group's sites but who do not form part of the Group's own staff (employees and non-employees).

Atresmedia is firmly committed to ensuring respect for and compliance with the human and labour Rights of all workers along the value chain, fostering decent conditions in all its operations.

STRATEGY

ESRS 2 SBM-2 **Interests and views of stakeholders_**

Atresmedia is aware of the role that its business model may play in creating, exacerbating or mitigating significant material impacts on value chain workers.

In its 2023 double materiality assessment, Atresmedia identified and assessed impacts, risks and opportunities that could affect value chain workers and which related to issues such as working conditions, equal opportunities and human and labour rights. In order to listen to the views of its value chain regarding Atresmedia's business model, the Group included in the materiality process a small representation of its suppliers of goods and services, its content suppliers (production and distribution companies) and main clients (agencies and advertisers), all of whom had the opportunity to evaluate, along with the rest of the impacts, those that could potentially affect their workers.

While the Group does not have exclusive communication channels set up for value chain workers to voice their concerns, it continues to actively talk and collaborate with them, especially with those who carry out their activities on Atresmedia's sites. This communication takes place predominantly with the area that relates organically to the workers of the outsourced services. Moreover, like any other stakeholder, value chain workers are free to use the Atresmedia Whistleblowing Channel to report any potential breaches within the Group that come to their attention.

Notably, the human rights due diligence that the Group conducted in 2023 revealed that the mechanisms put in place by Atresmedia were sufficient to ensure respect for the human and labour rights of its employees and those in its value chain. These mechanisms include contractual clauses requiring respect for human and labour rights, which help to minimise the appearance of negative impacts or potential risks for the workers of the subcontracting companies.

However, the Group appreciates that it may have only limited control over such personnel and believes that it is ultimately the employer's responsibility to ensure their protection and to be aware of their interests and views.

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

As a result of the double materiality assessment, Atresmedia has identified potential impacts and risks[44] on value chain workers associated with the following material topics: "Engagement with and impact on the community" and "Human and labour Rights":

[44] *Note that no material opportunities were identified.*

	IROs	DESCRIPTION	POLICIES
	Engagement with and impact on the community		
POSITIVE IMPACT	Social and occupational inclusion initiatives	Collaborating with foundations and associations that provide professional services to third parties has a positive impact on certain workers, as it contributes to the social and occupational inclusion of various vulnerable groups, such as people with disabilities, while simultaneously promoting diversity along the value chain.	· General Corporate Responsibility Policy
	Human and labour rights		
POSITIVE IMPACT	Generating employment in the value chain	The Group, with its strategy of diversification and investing in start-ups, supports small businesses, helps them to generate wealth and contributes to the creation of quality employment, thus generating a positive impact on the employees of these companies.	
POTENTIAL RISK	Non-compliance with human rights and labour legislation	Non-compliance by any Atresmedia employee (such as a production company) with prevailing legislation on human and labour rights, whether due to a failure of the Group's control mechanisms or some other issue beyond Atresmedia's control, could trigger reputational repercussions for Atresmedia.	
POTENTIAL RISK	Failure to implement health and safety measures	If the health and safety measures are not implemented correctly, subcontractor personnel would be at risk of suffering an accident, such as during filming on the Group's sites, which could have financial and reputational repercussions for Atresmedia.	

All of the risks described above are potential risks, none of which derive directly from an actual negative impact on value chain workers. It should also be noted that none of the risks reported exceed the materiality threshold defined by Atresmedia. Even so, these risks have been included in this Statement because Atresmedia reports by topic and the Human and Labour Rights topic as a whole is considered material for the Group.

As mentioned earlier, in 2023 Atresmedia carried out a human rights due diligence, in which it assessed how its business could be exposed to the risks of human rights abuses. This process involved the following phases:

1. **Setting up of a human rights working group:** a specific Human Rights working group was set up, covering all the Group's relevant activities and listening to the views of all right holders that could be affected, including value chain workers, so as to fully understand how Atresmedia's activities could influence human and labour rights.

2. **Identification and assessment of material human rights:** the most material human rights for the Atresmedia Group along its value chain were identified and assessed, including the perspective by country45, by sector and of the company itself. At country level, all the countries in which Atresmedia has a presence through its own operations were considered, as were those with which it maintains commercial ties

[45] *The countries analysed in the Human Rights Due Diligence process were Spain, Austria, Colombia, France, Germany, Ireland, Mexico, the Netherlands, Turkey, the United Kingdom and the United States.*

(both upstream and downstream). At sector level, numerous sources from the media sector were consulted. Lastly, at Company level, it was analysed whether the Group had been involved in any adverse impacts reported through the Whistleblowing Channel or the following contact points: OECD National Contact Point (NCP) and

The Business & Human Rights Resource Centre (BHRRC). The analysis did not reveal significant risks of child, forced or compulsory labour among value chain workers, nor were specific groups of particularly vulnerable workers identified along the value chain.

3. **Identification of protection mechanisms and measures:** the mechanisms put in place by the Group and the steps taken to prevent breaches and ensure the protection of all rights identified as material were properly identified.
4. **Drafting of a Due Diligence Handbook:** the process, material rights and mechanisms put in place were all documented and it was concluded that they were sufficient to ensure respect for human rights and, therefore, that no further steps were required.

Type of workers present in the Atresmedia value chain_

To help people understand Atresmedia's relationship with its value chain, the Company has identified and segmented the main workers in the value chain who could be significantly and broadly[46] affected by its activities:

1. **Employees of subcontracted companies who work at Group sites, or sites managed by Atresmedia**, including:
   - Workers who carry out Group-related activities on the Group's premises, such as production companies involved in airing programmes for laSexta and Antena 3 on Atresmedia premises.
   - Workers of subcontractor companies who carry out Group-related activities at sites managed by Atresmedia. For example, employees of a subcontractor production company who help to shoot an Atresmedia programme at sites that do not belong to the Group.
   - Workers of subcontractor companies who carry out activities not related to those of the Atresmedia Group on its sites, such as workers who provide catering services or cleaning services.
   - Workers of construction subcontractors on Group premises, such as those who carry out maintenance work.
2. **Workers in the upstream value chain,** which mainly includes employees of companies that provide the Group with goods, services and content on other sites, such as the workers of the production companies that Atresmedia subcontracts to produce audiovisual content off the Group's facilities.
3. **Workers in the downstream value chain,** which mainly includes employees of the agencies and advertisers that buy advertising space from Atresmedia.
4. **Workers of companies in which Atresmedia holds a stake,** mainly Buendía Estudios and Hola TV, among others.

As explained above when describing the IROs, Atresmedia has identified certain risks associated with the outsourcing of services. To control these risks, and as part of its Occupational Health and Safety Management System, the Group ensures that its activities comply with the Spanish Occupational Health and Safety Act. In doing so, it adjusts its actions, procedures and requests for information to the specific needs and circumstances of each relationship.[47]

[46] *All the negative impacts are considered to be Group-wide, as they have the potential to affect a large group of value chain workers and are not limited to specific individual cases.*
[47] *Atresmedia has not detected any negative impacts on the workers in the value chain and, therefore, no workers who are particularly vulnerable to the risks.*

INCIDENT, RISK AND OPPORTUNITY MANAGEMENT

S2-1 Policies related to value chain workers_

Owing to Atresmedia's firm commitment to the rights and welfare of workers along its value chain, the Group relies on various reference frameworks, such as the provisions of the ILO, and on its own policies to ensure compliance with applicable labour standards. These key internal policies include:

- The Occupational Health and Safety Management System and the Health and Safety Policy
- The Atresmedia Group's Human Rights Due Diligence Handbook
- Atresmedia's Code of Conduct

Occupational Health and Safety Management System and Health and Safety Policy_

Atresmedia has an **Occupational Health and Safety Management System, certified under ISO 45001**, which sets out the guidelines for action, the organisational structure, the resources and the processes needed to help prevent occupational risks. This system coordinates activities for the subcontracting of work by Group companies adhered to the Joint Occupational Health Service. It also describes the procedures to be followed to ensure that the workers of these companies carry out their work safely.

As part of the system, and as explained at greater length in chapter S1, Atresmedia has a **Health and Safety Policy** which was approved in 2020 by the then CEO. This policy sets out the key health and safety principles that the Group has pledged to observe when running its business and makes them a key part of the business management of the entire Atresmedia Group.

Human Rights Due Diligence Handbook_

The Atresmedia Due Diligence Handbook identifies the most material human rights for the Group and describes the measures and mechanisms in place to prevent possible abuses or adverse impacts. It also reflects Atresmedia's commitment to minimise the impacts any of such abuses should they materialise and to provide redress to those affected. This process considers the rights enshrined in the International Bill of Human Rights and the fundamental rights set out in the Declaration of the International Labour Organization (ILO) and the European Charter of Human Rights.

Atresmedia's commitment to human rights, as described in the Due Diligence Handbook, is also formally included in the Company's Code of Conduct.

Atresmedia Code of Conduct_

To guarantee a positive relationship with all the members of its value chain, Atresmedia endeavours to disseminate and ensure compliance with its **Code of Conduct** among its suppliers and other business partners. This code, approved by the Board of Directors, sets forth the principles that should steer all commercial relations. These include collaboration to achieve common objectives and ensure compliance with Atresmedia's social responsibility standards, the protection of and compliance with the UN International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the European Charter of Human Rights.

The Code of Conduct also sets out Atresmedia's firm commitment to foster the adoption of advanced health and safety practices among its suppliers and collaborators, thus ensuring that their workers carry out their work with the utmost safety assurances.

While Atresmedia does not have a specific Code of Conduct for suppliers, when approving and awarding contracts to suppliers of goods and services, the supplier concerned must sign Atresmedia's general terms of contract and **confirm their acceptance and commitment to act in accordance with the Group's Compliance Model**, which includes matters related to human and labour rights. Atresmedia's Code of Conduct, which all suppliers must sign together with the model, explicitly includes the rejection of forced, compulsory and child labour, in accordance with the provisions of the ILO.

Moreover, contracts for the provision of services, including content production contracts, include a dedicated clause on regulatory compliance and crime prevention in which the contractor declares that it is aware of and understands the Group's Crime Prevention Model and all the documents included therein. There is also a clause on corporate responsibility and, by signing the contract, the supplier or contractor declares that, within the framework of Atresmedia's General Corporate Responsibility Policy, it fosters, among other principles, equality among its employees and respect for human and labour rights, prohibiting any form of discrimination based on gender, race, sexual orientation, religious belief, political opinion, nationality, social origin, disability or any other circumstance that could give rise to discrimination. It also includes a clause on the company's responsibility when it comes to occupational health and safety, whereby the company concerned undertakes, among other matters, to minimise possible risks arising from the work or service in accordance with prevailing occupational health and safety law and regulations.

S2-2 Processes for engaging with value chain workers about impacts_

Atresmedia works to ensure meaningful two-way dialogue with the workers in its value chain to address any labour issues that may arise in the course of their activities (especially with those who work on its sites), despite having no formal process in place to collaborate directly with such workers or their representatives, as it believes that it is up to their employers to have such mechanisms in place.

As mentioned earlier, the Atresmedia Group does not have any specific and exclusive communication channels for value chain workers. However, those individuals who work on Atresmedia's sites on a permanent basis are considered to be an integral part of the Atresmedia team. Therefore, each department or area responsible for arranging and managing the service acts as the main liaison and point of contact between them and the Group. For example, the General Services sub-division oversees the relationship with the company providing catering services, while the Infrastructure sub-division handles relations with the company providing maintenance services.

S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns_

Atresmedia fully understands that it must have mechanisms in place so as to ensure that value chain workers are able to seek and obtain redress if their human or labour rights are breached, or if the prevention measures put in place happen to fail. However, Atresmedia also believes that the worker's own employer is primarily responsible for having mechanisms in place to protect its workers and to ensure that these incidents do not occur and, if they do occur, to remediate them.

To help **detect and prevent possible negative impacts** on value chain workers, Atresmedia endeavours to raise awareness of its Compliance Model, including the Group's Code of Conduct, among its suppliers of goods and services, production companies, distributors and clients, including advertisers and advertising agencies. It also provides both its own staff and the workers in its value chain with the Whistleblowing Channel, as a public and confidential mechanism accessible via the Group's corporate website or Intranet which can be used to submit communications confidentially or anonymously, thus ensuring the privacy of users. Communications are reviewed and managed in accordance with the regulatory procedure for this channel, with due assurances of confidentiality and protection of the reporting person.

In 2023, various improvements were made to bring this channel in line with the stringent new legal obligations under Law 2/2023 of 20 February, on the protection of persons who report regulatory infringements and the fight against corruption:

- A technological solution provided by an external service provider was implemented in order to comply with the functionalities and security safeguards required by the new regulations. This solution is accessible from both the Intranet and the corporate website. An updated internal procedure was also approved to effectively manage channel-related information, ensuring regulatory compliance.

- The Compliance Officer was named the person directly in charge of the internal Whistleblowing Channel.

As a result, the channel was established as the preferred means of communication, providing an integrated and unified response, in accordance with the new law, to all applicable regulatory requirements and recommendations. The following matters should be reported through this channel:

- Infringements of European Union law falling within the scope of the matters listed in the Annex to Directive (EU) 2019/1937.

- Breaches of Spanish criminal, administrative and labour laws;

- Breaches of internal rules and regulations of Atresmedia Group's Compliance Model; and

- Any other unlawful act or omission that affects or undermines the general interest, or that constitutes a human rights abuse and, including any conduct that constitutes harassment in the workplace, sexual harassment, or discrimination, and involves health and safety, workers' rights, market and consumer rights, intellectual and industrial property, financial and non-financial information, data protection, fraud and corruption, money laundering, social security, public finances, or queries regarding the application of the Compliance Model.

The Compliance Officer and his team handle and follow up on all communications received through four main phases: receipt, investigation, decision and closure. More precisely, during the decision phase, an action plan is drawn up and measures proposed to correct, mitigate and prevent the reported irregularity. The Compliance Officer assesses the scope and severity of the facts and circumstances investigated and draws up a report of findings containing the proposed decision and the relevant steps to be taken. In exercising their duties, the Head of Compliance has full autonomy on how best to proceed, reporting exclusively to the Regulatory Compliance Committee and the Audit and Control Committee.

S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action_

For Atresmedia, respect for and protection of human and labour rights is an essential principle and, within its sphere of influence, it takes action to ensure that these rights are respected in all its operations and relations with third parties. Those measures aimed at preventing and mitigating potential adverse impacts on each of the rights flagged as material by the Group are set out in its Human Rights Due Diligence Handbook. Regardless of the groups of people who may be affected, each competent area monitors and controls those measures that fall within its remit to ensure due protection of human rights.

Moreover, in order to ensure respect for the human and labour rights of its value chain workers, Atresmedia has the following measures in place, which are grouped into three main blocks:

1. **Measures for workers of suppliers of goods and services: approval procedure for suppliers of goods and services:** the Group has a digital supplier approval procedure enabling it to control the suppliers of goods and services with which it has relationships. Before any contract is signed, the pertinent documentation is requested on matters relating to human resources and occupational health and safety, among others, so as to ensure that these rights are not breached by any third party. During the approval process, suppliers are also asked to sign a declaration confirming their acceptance of the Atresmedia Group's Compliance and Privacy Model and agreeing to take all necessary steps to ensure that their own actions, and those of their workers, are carried out in strict accordance with the Atresmedia Group's own principles and values. They must likewise state their refusal to tolerate any criminal conduct or any other situation that runs contrary to Atresmedia's model. If they happen to spot any such conduct, they must report it directly to the Group through the whistleblowing channel. By signing the declaration, suppliers of approved goods and services undertake to promote equal opportunities and treatment among their workers and to respect the principle of non-discrimination. Notably, the declaration includes a commitment to comply with European and national regulations on the protection of personal data and the assurance of digital rights.

   Along with the declaration, during the approval process suppliers of goods and services must accept the General Terms of Contract, Article 24 of which sets out the supplier's commitment with regard to workers and any third party.

2. **Measures affecting the workers of content providers: contractual clauses.** When it comes to commercial relations with content providers, and as mentioned earlier, Atresmedia includes, in all its contracts with production companies, a clause in which they state that, among other

principles, they foster equality among their employees and ensure respect for human and labour rights, without tolerating any kind of discrimination on the grounds of gender, race, sexual orientation, religious belief, political opinion, nationality, social origin, disability or any other circumstance that may give rise to discrimination.

Atresmedia promotes and disseminates the contents of its Code of Conduct among suppliers of goods and services, production companies, distributors and clients such as advertisers and advertising agencies.

3 **Health and safety measures for all workers at subcontracted companies; coordination of business activities.** As regards the relationship with subcontractors and the health and safety of value chain workers, Atresmedia looks to build a dynamic and flexible system of continuous improvement for the proper management of occupational health and safety. The Atresmedia Group's Occupational Health and Safety and Medical Services department has mechanisms in place to ensure due respect for the health and safety of workers of Atresmedia's subcontractor companies, thus minimising the risks to which they are exposed when carrying on their activities.

As the main measure and in accordance with the requirements of the Occupational Health and Safety Act, Atresmedia coordinates the business activities of those Group companies adhered to the Joint Occupational Health Service, thus covering employees of subcontractor companies and workers of temporary employment agencies. Further information on the management of health and safety issues at temporary employment agencies can be found in chapter S1. Own workforce.

Health and safety risks affecting value chain workers relate mainly to the prevention of occupational risks for employees of subcontractor companies that carry out their activities on the Group's sites or on sites coordinated by the Group, such as employees of the catering service who work at the headquarters. In these cases, as part of its duty to coordinate business activities, Atresmedia provides the subcontractor company with information on the existing risks inherent to its work

centres, the OHS and protection measures that must be taken, and the emergency measures in place to ensure that employees of these companies are able to carry out their activity safely. The Atresmedia Group also asks every contractor, in accordance with the provisions of the Occupational Health and Safety Act, to provide information on the occupational health and safety measures it implements and which cover the employees assigned to the services provided.

In each case, the Atresmedia Group's Occupational Health and Safety and Medical Services Department requests the relevant information to ensure that the work ultimately carried out is fully compliant with the health and safety measures. The documentation that Atresmedia requests from its subcontractors to ensure compliance with the Occupational Health and Safety Act includes: a certificate of regulatory compliance on matters of ORP, a roster of workers, an assessment of occupational risks and the planning of the preventive activity, as well as certificates showing that health and safety training has been given in respect of the activities that the workers are to carry out. Atresmedia may also appoint a Health and Safety Coordinator, if required under current legislation, to oversee the activity and ensure that it is carried out safely.

If the services of content production companies are arranged, and where the activity is not carried out on Atresmedia's premises or with Atresmedia's own employees, these companies are asked to prove that have duly implemented the necessary measures so that their employees can carry out their activities safely and that they comply with applicable law and regulations in this regard.

Activities with a positive impact on value chain workers_

Aside from the measures in place to prevent negative impacts and respect the rights of value chain workers, the Group takes part in various initiatives that generate positive impacts, including the following:

1. By developing new businesses and investing in startups, Atresmedia helps to generate quality employment and wealth.
2. Atresmedia helps to create a diverse value chain by partnering up with foundations and associations devoted to the labour job market inclusion and employability of vulnerable groups by having them provide professional services to third parties.

Management of material impacts_

Different areas and departments of Atresmedia are tasked with managing the impacts and risks described above. For instance, Occupational Health and Safety and Medical Services coordinates business activities; Purchasing approves suppliers of goods and services; and the Sustainability department was tasked with drawing up the due diligence handbook, with the involvement of various areas including legal services, internal audit, institutional relations and regulatory affairs.

Notably, no serious human rights issues or incidents related to the upstream and downstream segments of the value chain were reported in 2024.

METRICS AND TARGETS_

S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities_

Atresmedia does not currently have any measurable targets associated with the material impacts and risks related to the value chain workers identified in the double materiality assessment, and nor does it expect to set any such targets in the short term, as it believes it has robust measures and mechanisms in place enabling it to prevent and mitigate any adverse impacts and risks in terms of human and labour rights. However, the Group does monitor certain metrics to gauge the impacts and risks related to workers in its value chain.

As mentioned earlier, Atresmedia, as part of its due diligence process, regularly monitors the mechanisms in place to determine their effectiveness in minimising the likelihood of occurrence of those aspects flagged as 'salient issues' (including protection of personal data, intellectual property, privacy, honour and self-image) and, should they occur, in minimising their impact. This control process is carried out by each area responsible for each of the existing controls as part of their remit.

The Group also regularly reviews its internal policies and procedures to ensure that they are capable of identifying and responding to new risks in its operations, supply chain and other business relationships.

3 Información social_

ESRS S4

3.3 CONSUMERS AND END-USERS

The Atresmedia Group recognises the importance of the social ramifications of its activities, not only because of the impact it can have on its consumers and end-users, but also because of the need to adapt to the social context in which it operates and to address pressing social concerns.

The Company's mission is to " broadcast varied, innovative and high quality news and entertainment offerings that respond to our stakeholders' needs ", including its consumers and end-users. To succeed, Atresmedia lays bare its commitment to them through its social responsibility as a media company: offering responsible, truthful and quality content, combating fake news and disinformation, ensuring ethical and responsible advertising, ensuring the accessibility of its content, and promoting media and information literacy, among other pursuits.

STRATEGY

ESRS 2 SBM-2 Interests and views of stakeholders_

Atresmedia recognises the role that its business model can play in creating mitigating or exacerbating significant material impacts on society, particularly in relation to its consumers and end-users, as well as the materiality of these in relation to the Group's activity.

The Atresmedia Group distinguishes between two main types of consumers and users of its products and services.

- **Audience:** majority user of Atresmedia's product (news and entertainment content on online television, cinema, radio, digital and OTT atresplayer platform and atresplayer Premium subscribers).
- **Agencies and advertisers:** Atresmedia's main client and consumer of its advertising space.

According to its corporate purpose "we believe in the power of reflection and emotion" and in line with its vision of "being the reference independent multimedia communication group with a valuable and positive contribution to the society in which we operate", Atresmedia generates and broadcasts content that showcases its commitment to all these agents, catering to their interests and opinions in a differentiated manner and ensuring that their rights are respected.

The bedrock of this commitment is to offer news and entertainment content that is appealing, rigorous, produced under the highest standards of quality and that reflects the diversity of the society in which the Group operates, so that all audiences feel genuinely represented. In parallel, the Group endeavours to protect the most vulnerable groups, especially minors, while offering its advertisers safe and attractive spaces for their brands.

Moreover, to cater to the needs and concerns of its consumers and users and to gauge their perception of the Group, Atresmedia has implemented various active listening processes, as described in the following section of this chapter.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model_

As mentioned above, Atresmedia carried out a double materiality assessment of its own situation, including its strategy and business model, with the aim of detecting those aspects that could influence its stakeholders, including its consumers and end-users.

Gran parte de los impactos, riesgos y oportunidades identificados derivan del A large portion of the impacts, risks and opportunities identified derive from Atresmedia's own business model and its commitment to people, especially its audiences. The results of the assessment revealed that issues such as "Responsible, truthful and quality content"; "Responsible advertising" and "Fight against fake news and disinformation" are among the five most material topics for the Atresmedia Group, thus confirming their importance for the Atresmedia business model.

The Group also ensures that it adequately manages the impacts, risks and opportunities associated with these and other material topics that may influence its relationship with audiences and advertisers, such as **"Accessible content"**, **"Media and information literacy"** and **"Engagement with and impact on the community".**

By generating rigorous, truthful and critical news and current affairs content, along with diverse, innovative and outstanding entertainment, Atresmedia is able to cover the needs and interests of a wide and varied audience, generating positive impacts on all of them. This, together with Atresmedia's ethical commitment, its pledge to provide an outstandingly innovative commercial service and the security of the advertising space it offers brands, makes its channels, radio stations and platforms particularly attractive to brands.

Therefore, the sound management of the impacts, risks and opportunities associated with audiences and advertisers alike is a core part of its business model.

The audience is therefore the main consumer and end-user of Atresmedia's products that could be significantly and broadly[48] affected by the material impacts. Notably, Atresmedia has specific guidelines on how to act and mechanisms to protect audiences. These controls are also enhanced when dealing with particularly vulnerable audiences such as minors. Through these mechanisms, as described in this chapter, the Group protects its audience from possible incidents arising from its activities and matters such as the right to privacy, honour and self image, the protection of personal data, freedom of expression and non-discrimination.

Atresmedia also relies on the power and strength of its channels to build a more critical and well-informed society, though also one that is more sensitive and empathetic to pressing social and environmental concerns. Along these lines, it takes action (see section S4-4) to generate positive impacts on society, minimise possible risks and pursue opportunities related to its business and its relationship with audiences and advertisers.

As regards the material topics identified during the double materiality assessment, the main impacts, risks and opportunities related to both Atresmedia's audiences and its main clients, i.e. advertisers, are described below.

[48] *The negative impact identified is considered general rather than specific, as it has the potential to affect all consumers and end-users and society as a whole, and is not limited to individual cases.*

	IROs	DESCRIPTION	POLICIES
	Responsible, truthful and quality content		
POSITIVE IMPACT	Helping to build a well-informed society	Atresmedia, when carrying on its activities and by disseminating and broadcasting responsible, truthful and high-quality content, helps to build a well-informed, critical and reflective society. Moreover, thanks to the news it broadcasts under the paramount criteria of objectivity, viewpoint diversity, truth and fact-checking, it helps people gain a better understanding of the context in which they live, so that they can form their own opinion and make informed decisions.	· General Corporate Responsibility Policy · Codes of ethics of *laSexta Noticias* and *Antena 3 Noticias*
POSITIVE IMPACT	Investing in technology to further enhance its ability to communicate	Atresmedia invests in state-of-the-art equipment such as high-definition cameras, transmitters, antennas, satellites and other cutting-edge equipment to improve and expand its broadcasting outreach and generate outstanding content for its audiences.	· Codes of ethics of *laSexta Noticias* and *Antena 3 Noticias*
POSITIVE IMPACT	Commitment to truthful news coverage	Atresmedia, through its newsrooms and experienced professionals, partnerships with prestigious news agencies, and by investing in cutting-edge technology to increase its fact-checking prowess, helps to build a truthful and responsible news environment.	· General Corporate Responsibility Policya · Codes of ethics of *laSexta Noticias* and *Antena 3 Noticias*
POTENTIAL RISK	Non-compliance with codes of ethics and failures in fact-checking mechanisms	Were the Group's professionals to repeatedly fail to abide by the Codes of Ethics or were the fact-checking mechanisms to fail, the Group could be implicit in spreading inaccurate information, which in turn could erode the trust that audiences place in Atresmedia.	
POTENTIAL RISK	Broadcasting of sensitive content, including violent images.	Atresmedia recognises that it must take special care when broadcasting content that is particularly sensitive due to its nature (violent images) or could affect specific groups or individuals. It knows full well that disseminating this content carries a risk if it is used for any purpose other than to provide the context needed to properly understand the information also being conveyed.	
OPPORTUNITY	Commitment to truthful news coverage	Atresmedia can remain a leader and benchmark in the media segment and continue to attract audiences to trustworthy media in a scenario where there is an increase in fake news and disinformation. It also has the capacity to set itself apart from other sources of content and its competitors.	
	Fighting fake news and disinformation		
POSITIVE IMPACT	Helping to build a well-informed society	Atresmedia's journalistic efforts to combat hoaxes, fake news and disinformation help to create a well-informed society in which people can make conscious and responsible decisions.	· General Corporate Responsibility Policy · Codes of conduct of Antena 3 and la Sexta
POTENTIAL RISK	Consumption of information that has not been reliably fact-checked	The mass consumption of information on social media and other platforms, where disinformation is rampant, can lead to a loss of trust among audiences in traditional media.	
OPPORTUNITY	Commitment to truthful news coverage	Atresmedia, by bringing its experience to bear in combating fake news on social media, has an immense opportunity to redirect audiences towards the traditional media by pursuing a rigorous approach to news coverage.	

	IROs	DESCRIPTION	POLICIES
	Responsible advertising		
POSITIVE IMPACT	Brand Safe: un espacio seguro para las marcas	Atresmedia Publicidad es miembro activo de Autocontrol, ofrece un espacio seguro para las marcas y cuenta con mecanismos de protección a la audiencia que velan porque su actividad comercial se desarrolle de una forma ética y responsable.	· Política General de Responsabilidad Corporativa · Política de Publicidad Responsable
POTENTIAL RISK	Non-compliance with advertising regulations	Non-compliance with prevailing legislation or voluntarily accepted codes regulating the broadcasting of commercial communication due to the failure of control mechanisms could expose the Group to the risk of fines.	
OPPORTUNITY	Catering to the needs of conscious consumers	Growing demand for sustainable products among consumers and for sustainable solutions among agencies could represent an opportunity for Atresmedia Publicidad in terms of both reputation and revenue.	
	Content accessibility		
POSITIVE IMPACT	Exceeding minimum legal requirements on content accessibility	Atresmedia goes beyond the minimum requirements prescribed by the General Audiovisual Communication Law in terms of sign language, audio description, subtitling and closed captioning on its linear television channels, helping to ensure that everyone can access its content.	· General Corporate Responsibility Policy
POTENTIAL RISK	Non-compliance with accessibility regulations	Atresmedia keeps close control of its accessibility mechanisms to minimise the risk of non-compliance with legal requirements, which could result in requirements and sanctions.	
OPPORTUNITY	Research and development to improve accessibility	Research and development of measures to improve accessibility, including web and cognitive accessibility, as well as use of artificial intelligence tools, give an opportunity to improve existing signing, audio description and subtitling and closed captioning systems, which could lead to time and cost savings.	
	Personal data protection		
POSITIVE IMPACT	Ensuring the protection of personal data	Atresmedia has a Data Protection Compliance Model featuring a series of policies, procedures and tools that define the Group's objectives in this area and specify the principles governing its actions as a company and those of its employees and collaborators. Atresmedia also informs its users and customers about the processing of their personal data by publishing the corresponding privacy policies.	· General Data Protection Policy
POSITIVE IMPACT	Raising awareness of data protection	Atresmedia carries out communication campaigns alongside entities such as the Spanish Data Protection Agency (AEDP) to promote responsible behaviour with regard to personal data among its audiences.	· General Data Protection Policy
POTENTIAL RISK	Failures in data protection mechanisms	Atresmedia is aware that any failure in its Privacy Model or in the control mechanisms in place could lead to data leaks and fines.	

	IROs	DESCRIPTION	POLICIES
	Media and information literacy		
POSITIVE IMPACT	Developing media and information literacy skills.	Fundación Atresmedia, through its various projects (Mentes AMI, Efecto Mil, Amibox, Amibox-Aula and Amiflash) and outreach campaigns, promotes media and information literacy among children and young people and their educational community, working so they can grow up and mature safely within the current media and digital environment.	· General Corporate Responsibility Policy
POTENTIAL RISK	Non-compliance with the General Law on Audiovisual Communication	Were the activity of Fundación Atresmedia to cease for one reason or another, the Group could find itself in breach of the General Law on Audiovisual Media, seeing as though Atresmedia, as an audiovisual media operator, must work to promote the media literacy skills of society.	
	Engagement with and impact on the community		
POSITIVE IMPACT	Creating and broadcasting content that reflects the rich diversity of society	As part of its commitment to the audience, Atresmedia broadcasts genuinely informative and entertaining content that reflects the diversity of society with the aim of making everyone feel represented, including especially vulnerable groups such as people with disabilities, the elderly and the LGBTIQ community.	· General Corporate Responsibility Policy
POSITIVE IMPACT	Development of social responsibility campaigns	Atresmedia, through various corporate initiatives such as *Ponle Freno, Constantes y Vitales, Contra el Maltrato Tolerancia Cero, Hablando en Plata, Levanta la Cabeza* and *Luz Verde*, raises awareness among its audiences and brings them closer to a variety of social concerns, including road safety and the fight against gender-based violence.	· General Corporate Responsibility Policy
OPPORTUNITY	Development of social responsibility campaigns	Continuing to promote social responsibility campaigns is an opportunity to attract brands that want to be linked to the causes promoted by such campaigns, as well as to generate awareness, position itself as a responsible media outlet and attract more audience.	
POSITIVE IMPACT	Mechanisms for the protection of children and broadcasting of children's programming	With the aim of protecting its most vulnerable audience, Atresmedia has various protection mechanisms in place, including mechanisms to control advertisements and the content rating system and parental control features available in atresplayer. It also has specific programming for children with Neox Kidz.	· General Corporate Responsibility Policy · Responsible Advertising Policy
POTENTIAL RISK	Failings in control mechanisms and regulatory breaches	Were the control mechanisms or the rating system for minors to fail, this could result in a breach of regulations, leading to sanctions for the Group.	

	IROs	DESCRIPTION	POLICIES
	Mouthpiece for social causes and the climate		
POSITIVE IMPACT	Broadcasting of social and environmental content	Thanks to initiatives such as the free advertising space for NGOs, support for the Emergency Committee or the broadcasting of climate-related content, Atresmedia raises awareness among its audiences and brings them closer to various social realities, thus calling them to action and championing values such as tolerance, empathy and adaptation to climate change.	· General Corporate Responsibility Policy · Environment and Climate Change Policy
POTENTIAL RISK	Broadcasting of social and environmental content	Ceasing to broadcast content that reflects diversity and calls society to action for the benefit of specific social and climate causes could impact the social value and worth of the Atresmedia brand.	
	Diversity, equity and inclusion		
POSITIVE IMPACT	Creating and broadcasting content that reflects the rich diversity of society	Atresmedia is firmly committed to disseminating the values of diversity, fairness and equality and doubles down on this commitment by adhering to initiatives such as the Diversity Charter or the agreement *'Empresas Libres por una sociedad libre de violencia de género'* (Free Companies for a society free of gender-based violence).	· General Corporate Responsibility Policy · Diversity, Equity and Inclusion Policy
	Good governance and business ethics		
POSITIVE IMPACT	Policies on business conduct	Atresmedia has various policies and measures in place to ensure that its activities are carried out responsibly, while protecting its audience and catering to the interests of its stakeholders.	· General Corporate Responsibility Policy · Responsible Advertising Policy
POTENTIAL RISK	Conflicts of interest in journalism	Atresmedia is aware that its professionals, when going about their work, may encounter conflicts of interest, which could affect the audience's perception of Atresmedia.	

Engagement with the most vulnerable audiences_

When carrying out its activities, Atresmedia pays close attention to two groups of people to whom it is especially committed: minors and the elderly. It is therefore particularly mindful of them when airing its audiovisual programmes.

In the case of minors, and especially child audiences, Atresmedia has specific mechanisms in place to ensure their protection, including the content rating system and monitoring and control of advertising content. Meanwhile, to help generate positive impacts on them, it broadcasts specific content for children through Neox Kidz, and its amibox channel, which is available on atresplayer, featuring specific content on media and information literacy. All these actions are described in section S4-4.

Atresmedia is also heavily committed to senior audiences and broadcasts specific content to showcase their key role within society and to generate positive impacts on them. The flagship initiative here is Hablando en Plata, which fights against ageism and on which more information is provided in section S4-4.

Broadly speaking, the material risks and opportunities[49] identified affect all consumers and end-users, as they relate largely to societal aspects including different audience groups. However, there are child protection risks that directly affect minors.

INCIDENT, RISK AND OPPORTUNITY MANAGEMENT

S4-1 Policies related to consumers and end-users_

Atresmedia has the following policies and codes in place, which set out the commitments and lines of action guiding its relationship with audiences and advertisers alike:

Política General de Responsabilidad Corporativa_

The General Corporate Responsibility Policy (2010), approved by the Board of Directors and last updated in 2021, sets out the Group's sustainability strategy and includes the following commitments related to the activities it carries out:

- **To produce and broadcast responsible news coverage and entertainment content that is accessible to society as a whole**, including the Group's pledge to create truthful content, to uphold and promote human rights, freedom of expression, diversity, viewpoint diversity and non- discrimination across all news and entertainment content, as well as its support for the various national and international conventions and declarations signed in Spain.
- **To promote honest, ethical and outstanding advertising across all its media,** complying with the principles of the Self-Regulation Codes to which it has voluntarily adhered, ensuring that advertising content rigorously respects human rights, rejecting any content that incites violence or discrimination, and being especially wary with advertising products placed next to content aimed at child audiences.
- **To contribute to the progress and development of society,** through social awareness actions via its media outlets; active collaboration with NGOs and the activity of Fundación Atresmedia, among others.
- **To minimise the environmental impact and raise awareness among society about caring for the environment,** thus making it more resilient to the effects of climate change.
- **To build transparent relations with stakeholders,** by establishing fluid and active channels of dialogue with all of them.

[49] *Most risks and opportunities derive from previously identified impacts.*

Responsible Advertising Policy_

The **Responsible Advertising Policy**, updated in 2024 and approved by the General Manager of Atresmedia Publicidad, complements and extends the commitments related to the Group's advertising activity set out in the General Corporate Responsibility Policy. This document, drawn up for the first time in 2010, can be found on the Atresmedia and Atresmedia Publicidad websites and its main objective is to provide clear and transparent information on the approach of Atresmedia Publicidad when it comes to the values guiding its strategy, the aim being to generate trust and provide value to its stakeholders. The main lines of action set out in the policy are as follows:

- **Promoting quality, efficiency and innovation in all advertising content,** offering advertisers and agencies alike an excellent and highly versatile commercial offering, guaranteeing a safe environment for its brands (**Brand Safe**) and fostering a relationship based on the principles of honesty and transparency with them.

- **Promoting self-regulation within the industry in order to build an ethical and truthful framework,** thus complying with current legislation and with the **Self-Regulatory Codes** to which Atresmedia is voluntarily adhered, specifically:

  - Code of Conduct on Data Processing in Advertising (2021)
  - Code on the Use of Influencers in Advertising (2021)
  - Code of Conduct on Commercial Communications of Gambling Activities (2012)
  - Self-Regulatory Code on Food Advertising Targeting Young People, the Prevention of Obesity and Promotion of Health (2010)
  - Self-Regulatory Code on Advertising Toys to Children (modified in 2010)
  - Self-Regulatory Code on Advertising for Spanish Brewers (2009)
  - Self-Regulatory Code on Wine Products (2009)
  - Self-Regulatory Code on SMS Marketing (2009)
  - Self-Regulatory Code of the Spanish Federation of Alcoholic Beverages (FEBE) (2006)

- **Ensuring respect for human rights, with special protection afforded to minors,** paying close attention to ensure that there is no incitement to violence, discrimination in any of its manifestations, or the promotion of conduct that violates human dignity; providing special protection for children and promoting accessible advertising.

- **Promoting a strong social commitment by itself and among its advertisers,** by championing a responsible, low-carbon industry that shows the environmental commitment of advertisers in a responsible way, making the work of NGOs more visible by offering them free advertising space for their campaigns and supporting communications that strengthen the values of diversity, equity and inclusion.

Diversity, Equity and Inclusion Policy (2024)_

The Group's Diversity, Equity and Inclusion policy also includes a commitment to a content model that reflects the diversity of society, raises the profile of minorities and respects all groups and segments. This policy complements the General Corporate Responsibility Policy and has been approved by the Group's Corporate General Manager.

Environment and Climate Change Policy_

As explained in the Environment and Climate Action Policy, approved by the Corporate General Manager, Atresmedia believes that as a media company, the greatest contribution it can make to the environment is by raising awareness among society and making each citizen aware of the importance of doing their bit. It therefore brings the broadcasting power of its communication channels to bear in promoting environmental protection and broadcasts news and documentaries, reports and awareness-raising campaigns on the subject.

Codes of ethics of Antena 3 Noticias and la Sexta Noticias_

Both Antena 3 Noticias and la Sexta Noticias have their own **Codes of Ethics,** which have been approved by the respective news departments. These codes set out the principles, rules and framework of action for news coverage and current affairs programmes and embrace a commitment to ensuring a truthful, diverse and committed news offer. These codes were updated in 2024 and are publicly available on the Atresmedia Corporación website for consultation by stakeholders. The main issues addressed by these codes include:

- Code of Ethics of *La Sexta Noticias*: The code is based on the Universal Declaration of Human Rights, as reflected in the Spanish Constitution, and sets out the commitment of Sexta Noticias to: offering fact-checked information that shows the real situation and respects people's private lives; combating fake news and disinformation; ensuring respect for the rights of freedom of opinion and expression and intellectual property; as well as the protection of minors in broadcasting and disseminating content; using **appropriate language** and **showing violent images sparingly and only when genuinely necessary.**

- Code of Ethics of *Antena 3 Noticias*: the code is predicated on respect for the Spanish Constitution and the legal framework emanating from it. Antena 3's news services operate under the premise of offering audiences outstanding and reliable information, committed to the principles of social responsibility associated with good journalism. The code sets out the commitment of Antena 3 Noticias to fight against disinformation and fake news; to fact check information so as to ensure the rigour and truthfulness of its news coverage, as well as respect for human dignity, freedom of expression, intellectual property, the presumption of innocence, appropriate use of language and the protection of minors when carrying out its activities.

General Data Protection Policy_

Atresmedia's General Data Protection Policy, to which all Group companies are subject, has been approved by the Regulatory Compliance Committee (RCC), with the Group's Data Protection Officer being ultimately responsible for enforcing it and reporting to the Group's management and Compliance Committee on any relevant incidents to have occurred and on the measures in place to prevent or otherwise remediate them. The policy, which is available to all Atresmedia employees, explains the principles of action and objectives when it comes to the processing of personal data and related rights, which include:

- Protecting the confidentiality of personal data entrusted to it by data subjects;

- Providing data subjects with all necessary information on how their personal data are processed;

- Informing data subjects on how to exercise their rights in relation to data protection; and

- Protecting personal data available to it with appropriate security safeguards.

The policy also complies with the European Charter of Human Rights, which enshrines the protection of personal data as a fundamental right, and with the provisions of prevailing Spanish and European legislation governing the protection of personal data.

Atresmedia also informs its users and clients about the processing of their personal data by publishing the corresponding privacy policies, which are available through the relevant service, such as atresplayer or the various corporate websites.

Last but not least, Atresmedia is adhered to the Code of Conduct on Data Processing in Advertising Activities, which has been approved by the Spanish Data Protection Agency (AEPD). The code establishes an out-of-court procedure for resolving disputes between member institutions and stakeholders. Atresmedia is also part of the AEPD's Digital Pact for the Protection of People. This initiative seeks to foster a commitment to privacy in the sustainability policies and business models of organisations. It aims to harmonise the fundamental right to data protection with innovation, ethics and business competitiveness. The pact also includes the ten golden rules on good privacy practices for media and organisations with their own broadcasting channels.

Code of Conduct_

As mentioned at various points throughout this Statement, Atresmedia's Code of Conduct, approved by the Board of Directors, sets out the principles, objectives and values governing the Group's conduct and the guidelines that should steer its relationship with third parties and society. It enshrines Atresmedia's express commitment to respect, protect and comply with the UN International Bill of Human Rights and Guiding Principles on Business and Human Rights and with the European Charter of Human Rights, which enshrines the protection of personal data as a fundamental right.

Atresmedia has also been a member of the Spanish Network of the UN Global Compact since 2008, as a further show of its commitment to its principles.

S4-2 Processes for engaging with consumers and end-users about impacts_

Atresmedia's relations with its stakeholders are based on mutual trust. It has various channels and means of communication in place to collaborate with them and listen carefully to their concerns and needs, while also being able to address any significant impacts—both positive and negative—that may affect them.

This active listening serves as a basis for making decisions about their business model; to meet the news coverage and entertainment needs of audiences while understanding the commercial expectations of the brands, by enabling them to tailor their commercial offer to the target audience and offering them an attractive and safe space to advertise in and be associated with.

The Group has different channels and mechanisms to engage with audiences and advertisers.

1 Engagement with audiences:

To cater to the needs and concerns of its audiences and to gain first-hand knowledge of how they view the Group, Atresmedia carries out continuous active listening processes through various channels. This includes getting audiences directly involved in studies and focus groups and offering guided tours of its sets and facilities, while setting up consultation channels through which Atresmedia provides specific information catering to their interests.

Direct involvement: Atresmedia has various processes of direct interaction and active listening with audiences or their representatives to learn more about their interests and concerns and make them part of the business model. Key processes:

- Audience studies and focus groups: the marketing and audience departments carry out research through qualitative and quantitative studies, providing first-hand knowledge of the tastes and preferences of society, in order to create content tailored to these tastes and preferences. In 2024, a total of 35 focus groups, eight mini-groups and 16 in-depth interviews were conducted to gain insight into the interests of the audience. Meanwhile, two "image studies" are carried out every year to update the Group's knowledge and awareness of the audiovisual ecosystem: audiovisual consumption across different media, platforms, channels, genres and content. This type of action is carried out under the coordination of Atresmedia Televisión.

- Double materiality assessment: Atresmedia regularly conducts materiality assessments, in which audience representatives take part in order to identify those issues of its business model that are most relevant ("material") for its stakeholders. In 2023, the Group carried out its first double materiality assessment, which was used as the main input in drawing up this Statement. This type of collaboration is the responsibility of the Sustainability department.

- Rocial media: due to the nature of its business and its guiding philosophy, the Atresmedia Group always strives to be at the forefront of new trends. It therefore works hard to adapt its content to different platforms and to adapt its content and language to the consumption needs of users. Social media also happens to be useful in assessing consumer tastes and trends when it comes to content.

- Guided tours: in a bid to bring the Group's activity closer to its stakeholders, Atresmedia has for years been giving guided tours of its facilities to schools, universities and other sectors. A total of 123 tours of Atresmedia's premises were given in 2024, involving a total of 2,285 visitors from 98 different organisations.

Queries and requests for information: Atresmedia offers its audiences a series of channels (mailboxes, WhatsApp channels and customer service telephone numbers), enabling anyone to contact the Group to communicate any issues they wish relating to their interests and opinions. It also proactively shares relevant information of interest among its stakeholders. Examples here include:

- **Corporate Responsibility Mailbox:** the sustainability department provides stakeholders with an email address for communicating on matters such as advertising, feedback on content, technical incidents and requests for information, or to make suggestions on other matters. This department then relays the enquiries and communications received through the mailbox to the corresponding area or department. A total of 128 enquiries were addressed in 2024.

- **atresplayer mailbox and Whatsapp channel:** to address issues related to the Group's content platform, including incidents, suggestions, etc.

- **Corporate websites:** all Atresmedia brands have a website containing information on the numerous actions carried out by the Group, as well as the latest news on content, programming, etc.

- **Telephone helpline:** the Atresmedia Group has set up a direct helpline that can be contacted by anyone who wishes to make an enquiry or request information. This telephone service is handled by a central switchboard, which then forwards the call to the relevant department. A total of 23,069 calls were received in 2024.

- **Newsletters and press releases:** Atresmedia offers its audience the opportunity to subscribe to various regular newsletters containing the latest information on the programmes and achievements of the Atresmedia Group.

2 Collaboration with advertisers and agencies

Atresmedia, acting mainly through Atresmedia Publicidad, takes part in various collaboration processes with advertisers and media agencies to gain a better understanding of the needs and concerns of its clients and to offer them the latest news about its commercial offer, content and strategic developments. Highlights here include:

- **UPFront event:** annual event organised by Atresmedia Publicidad in which the Group showcases its wares and presents its latest products and services to media agencies, advertisers and other industry professionals.

- **Advertiser portal and Atresmedia Publicidad website and WhatsApp channel:** offering the latest information on Atresmedia's products and services and where its customers can make queries related to this commercial offering.

- **Monthly meetings with AUTOCONTROL:** Atresmedia Publicidad attends monthly meetings and working groups convened by AUTOCONTROL to address issues related to the regulation and self-regulation of the advertising market.

- **Working committee with the IAB (Interactive Advertising Bureau):** Atresmedia Publicidad holds regular working meetings with the IAB, where it contributes ideas and proposals on various issues affecting the advertising market.

- **Double materiality assessment:** as it does with its other stakeholders, Atresmedia involves advertisers and agencies in its materiality assessment to gauge their views of the business model.

All these mechanisms give Atresmedia a broad overview of the interests and opinions of its audiences and its clients and to take this into account when making decisions that may affect its business model.

S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns_

Atresmedia, in its commitment to advertisers and audiences alike, strives to run its business in an ethical and responsible manner. To succeed in this task, it maintains a preventive approach and relies on various robust monitoring and control mechanisms to help prevent unfortunate incidents affecting its audiences and to offer a safe space for its advertisers.

In the event that these mechanisms fail, the Group has specific communication channels and procedures in place to remediate any incidents that arise. These channels include:

- The Whistleblowing Channel: this is the priority channel for consumers to report possible breaches of the Group's Prevention Model. For more information on the Whistleblowing Channel, see ESRS G1-1 Disclosure Requirement G1-1. This channel is available via the Atresmedia website.

- Advertisers' Office: exclusive and specific channel for Atresmedia agencies and advertisers aimed at attending to and resolving incidents or complaints received from their clients. This channel is available on the website of Atresmedia Publicidad. As part of its commitment to maximising user satisfaction with this service, it involves professionals from all areas of the Company in resolving the incidents, thus ensuring absolute independence from the day-to-day commercial running of the company.

- atresplayer customer service: the atresplayer platform has a specific customer service channel (telephone, Whatsapp and contact form) to deal specifically with incidents related to its service. Atresmedia conducts a customer service satisfaction survey on atresplayer, which received 3,552 responses in 2024.

- **Privacy mailbox:** Atresmedia has an email address for addressing claims and complaints relating to the protection of personal data, including the exercise of rights. More precisely, it is the email address of the Data Protection Officer, who is certified under the AEPD's certification scheme. A total of 1,760 requests to exercise data protection rights were logged and handled through the mailbox in 2024.

- **Corporate Responsibility Mailbox:** whenever any report of an incident reaches this channel, the department in charge of handling it forwards it to the relevant department or area so it can be addressed by the right team. A total of 128 enquiries were received in 2024.

As regards the redress procedures, Atresmedia follows a set of protocols. Upon detecting that a programme or commercial communication has had a negative impact on its audience, it looks into the matter and offers the relevant redress, which usually includes:

THE REDRESS PROCEDURES

TAKING DOWN CONTENT

If the incidents relate to cases of non-compliance with advertising rules or content rating, among other things, the remediation process involves taking down the advertising or the reliably rating the content in question (i.e. directly resolving the problem).

REMEDIATION

If the incident has caused damage that requires remediation, this is carried out in the same format and form as the content to be remediated.

TECHNICAL TROUBLESHOOTING WITH ATRESPLAYER

If the incident concerns some kind of problem with the atresplayer subscription, the cases are handled by the relevant department.

The procedure described in section G1 is followed for serious complaints handled through the Group's Whistleblowing Channel.

S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end- users, and effectiveness of those actions_

Social aspects are a key concern, not only due to the impact that Atresmedia can have on society through its content as a media company, but also the need to adapt to the social context in which it operates and to address the concerns of its stakeholders and maintain a sustainable business model.

As mentioned earlier, the double materiality assessment revealed that for the Group the most material topics relate to the need to provide responsible, truthful and quality content, ensuring responsible advertising, combating fake news and disinformation, ensuring accessible content, and promoting media and information literacy. It therefore works to meet the needs and expectations of its stakeholders by implementing specific actions for each of them.

Actions related to its advertisers and audiences fall into two main blocks:

- **Audience and advertiser protection:** actions aimed at providing a safe space for brands, viewers, listeners and digital users, through control and surveillance mechanisms and by ensuring the protection of the most vulnerable audiences.

- **Commitment to those issues that elicit the greatest social concern:** actions that reflect Atresmedia's key role in informing, raising awareness and contributing to the development and progress of the society in which it operates, while driving positive change among its audiences through the content it creates, broadcasts and disseminates. These include a commitment to truthful and fact-checked content, the fight against fake news, being a social mouthpiece and whistleblower, promoting media and information literacy, and pursuing social responsibility initiatives in support of numerous worthy social causes.

STRUCTURE OF THE REPORT ON ACTIONS RELATED TO INCIDENTS WITH CONSUMERS AND END USERS

a Protecting audiences and advertisers

- Brand Safe and responsible advertising
- Child protection
- Content accessibility
- Personal data protection

b Commitment to issues of major social concern

- The problem with fake news: Fighting fake news
- Corporate social responsibility initiatives: *Ponle Freno, Constantes y Vitales, Levanta la Cabeza, Tolerancia Cero, Crea Cultura, Hablando en Plata* and *Luz Verde*
- Broadcasting on social and environmental concerns: social and climate mouthpiece
- Media, information and digital literacy

a Protecting audiences and advertisers

Atresmedia, in order to carry out its activities responsibly, has a series of audience and advertiser protection mechanisms in place to promote safe and inclusive environments. The General Corporate Responsibility Policy and the Responsible Advertising Policy describe the key mechanisms in place to ensure audience protection, as well as the Group's commitment to fostering ethical and responsible relationships with its advertisers.

Brand Safe and responsible advertising_

Atresmedia Publicidad ensures the proper development of the advertising activity across all of the Group's channels and formats, including its digital platforms. In doing so, it ensures that the advertising broadcast is suitable for all audiences and aligned with the Company's values and mission, while guaranteeing a safe environment for brands (**Brand Safe**). In addition, strict compliance with applicable law and regulations on the identification of advertising activity and its differentiation from editorial activity under the General Law on Audiovisual Media is another of the core principles steering the Group forward. Notably, no commercial content is broadcast as part of the Group's news programmes.

Ad-content control mechanisms

Atresmedia Publicidad operates a model of advertising communication based on quality and responsibility towards advertisers and audiences alike, focusing on two lines of action:

- Making quality controls more effective.
- Lobbying for industry self-regulation to protect the rights of consumers and customers.

The Group ensures that all television advertising content undergoes strict quality control—both in-house and through third parties—prior to broadcasting.

- **In-house control:** the advertising and continuity department, through a rigorous quality control procedure and numerous screening processes, reviews ad campaigns before they are aired to detect possible incompatibilities with the main programme being broadcast and to ensure the quality of the communications. Meanwhile, Legal Services appraises any actions or advertising campaigns that could prove troublesome or have legal repercussions, with the aim of preventing possible risks of sanctions.
- **Third party control:** the Group bolsters its in-house control process by requesting **copy advice** from industry watchdog AUTOCONTROL, which issues reports vouching for the legal and ethical propriety of the ad campaigns, while also clarifying any doubts that Atresmedia Publicidad may have raised. In 2024, Atresmedia made a total of 1,978 copy advice requests from AUTOCONTROL and carried out 118 ethical queries regarding advertising content.

Thanks to this process, Atresmedia is able to make the right decision when it comes to airing ad campaigns, minimising the emergence of the risks identified and ensuring the protection of audiences and advertisers. If these mechanisms happen to fail and the content has a negative impact on the audience, Atresmedia Publicidad looks into the reasons why and, if necessary, cancels the campaign being broadcast. In addition, the control process is thoroughly checked in order to spot possible shortcomings and, if any are detected, to correct them. Lastly, in the event of sanctions arising from breaches of prevailing regulations or self-regulatory codes, Atresmedia Publicidad decides whether to accept or appeal the sanctions. In 2024, Atresmedia received only two sanctions for a total value of EUR 450,973.

Meanwhile, in order to remain a safe and attractive outlet for brands and to uphold its strict quality standards, Atresmedia Publicidad stays constantly up to date with the latest trends, developments and demands within the advertising market. In response to the increasing digitalisation of the market in 2024, Atresmedia endeavoured to offer its customers products that combine linear television with HBBTv and positioning on social media, along with special products to improve brand positioning. Examples here include differentiated sales on programmes such as *El Hormiguero, Las Campanadas, Max Singer* or *LaVoz.*

Child protection_

Atresmedia Group is firmly committed to the protection of minors and therefore has voluntary and regulatory mechanisms in place to ensure that its spaces are safe environments for them. This commitment is enshrined in the Group's General Corporate Responsibility Policy, thus serving as a form of institutional reinforcement of the protection mechanisms that the Company has in place to protect children in two key areas: television content and commercial communication (advertising).

In 2024, Atresmedia continued to improve upon the child protection mechanisms it has in place.

Measures and mechanisms targeting television content:

- **Content rating system:** in 2024, the Atresmedia Group continued to apply the corresponding age rating to all its content, which distinguishes the following categories: suitable for all audiences, +7, +12, +16, 18 and X.
- **Parental control:** the atresplayer platform has a special parental control and subscription system for family users, allowing different profiles to be created with different ranges for accessing content.
- **Entertainment content aimed at children:** through the Neox Kidz channel on atresplayer, the Atresmedia Group offers a wide range of entertainment focused mainly on children. In 2024, the Group broadcast a total of 1,226 hours of children's programming. Through the AMIBOX channel of Fundación Atresmedia (available on atresplayer), children between the ages of six and 15 can learn about media, information and digital literacy, among other concepts.

Measures and mechanisms aimed at commercial communications (advertising):

- **Implementation of the Codes of Ethics** relating to children. In 2024, Atresmedia Publicidad continued to ensure that all advertising was subject to the codes of conduct to which it is adhered. The company also complies with the provisions of the General Law on Audiovisual Media governing the positioning of advertising, which must not be placed next to children's programming.

Content accessibility_

Atresmedia aims to offer news and entertainment content that is accessible to all people, regardless of their visual and hearing capabilities. Leveraging sign language, subtitling, closed captioning and audio description, the Group makes sure that everyone can enjoy the news coverage and entertainment it offers on its six linear television channels, not only meeting but exceeding the requirements of the General Audiovisual Media Law, which insists on a minimum of 80% of subtitled content and five hours a week of sign language and audio description during prime time.

Moreover, the Group works to provide quality accessibility services, covering a broad range of news and on a wide array of formats, while maintaining accessible broadcasts 24 hours a day.

In order to achieve its objectives and offer outstanding content, Atresmedia ensures exhaustive control and monitoring over its internal broadcast control system. Atresmedia's broadcasting department reviews all signed (sign language), audio-described and subtitled content submitted by the service providers in three stages: prior to broadcasting, during broadcasting and after broadcasting. This process entails viewing subtitles and closed captioning, audio descriptions and sign language windows provided by content providers and directly monitoring the broadcasts, thus allowing Atresmedia to respond rapidly and effectively to any unforeseen technical or programme-related event, with only a minimal impact, or no impact at all, on the audience.

To monitor compliance with the requirements of the General Law on Audiovisual Media and UNE standards, Atresmedia also draws up weekly, monthly and annual monitoring reports based on the broadcasting register and the external controls of the service provider. The Group likewise responds to the monthly requirements of the CNMC, Spain's markets and competition commission, regarding compliance with the General Law on Audiovisual Media.

The main content accessibility actions carried out in 2024 were as follows:

- **Audio-description, Spanish signing, subtitling and closed captioning of television content going beyond the minimum requirements set out in the General Law on Audiovisual Media** In 2024, Atresmedia subtitled 93.9% of television content, audio-described a total of 3,263 hours and added sign language to a total of 2,820 hours of programming.

- **Subtitling and closed captioning of all current affairs programmes.** In 2024, Atresmedia subtitled the entire roster of its current affairs programmes.

- **Expansion of the accessibility service for institutional and medicine-related advertising campaigns and brand support,** including subtitling and closed captioning, signing and audio- description. Atresmedia also collaborates with advertisers. In 2024, a total of 909 hours of subtitled commercial content, 259 hours of signed content and 163 hours of audio-described content were broadcast.

- **Use of artificial intelligence (AI) to make content more accessible:** in 2023, the Atresmedia Group embarked on a project whereby it made internal resources available to its accessibility providers to develop new accessible broadcasting tools based on AI. In 2024, the Group continued this collaboration to further research and develop tools applied to signing and audio description.

- **Accessible QR on Antena 3 news programmes for the visually impaired:** in 2024, accessible QR codes were displayed on screen for Antena 3 news programmes. These codes are easy to scan and take the user directly to the news website so that they can access the content in a simple way and use their own translation or audio-description tools.

- **Enhanced accessibility in atresplayer:** in 2024, Atresmedia continued to improve the accessibility of its atresplayer platform, achieving a total of 28,269 hours of subtitled content.

Last but not least, it should be noted that the Group does not receive a significant number of communications concerning failures in the content made accessible on television. This is largely thanks to the controls and measures described above. In any case, if an incident is detected with the subtitling and closed captioning, signing or audio description of the content being broadcast, the relevant protocols are triggered and the relevant department or area is notified so that the matter can be resolved as swiftly as possible.

Personal data protection_

Data protection is a key concern for Atresmedia, as indeed confirmed during its double materiality assessment. Various Group companies, owing to their activities, process personal data that require proper management and protection. The Group therefore considers it necessary to continuously adapt and update its procedures in order to ensure compliance with privacy regulations and to minimise potential risks to the business and impacts on its stakeholders.

To make this happen, and as mentioned earlier, the Atresmedia Group has a Personal Data Protection Model that sets out the main organisational and governance guidelines and parameters on matters relating to privacy and data protection. The Group also carries out regular and specific actions to ensure the proper treatment of all personal data across the organisation. More to the point, the Group has specific policies, procedures and protocols in place to ensure that employees process personal data in accordance with the provisions of the GDPR[50] (for example, protocols for data protection in news content on Antena3, La Sexta, entertainment programmes, radio, etc.). It also has a control management system headed up by the data controllers, whereby the controller, acting alongside the DPO and the business areas, oversee the updating and adequacy of the data processing records.

In 2024, the main actions taken to manage data privacy issues that could affect customers and audiences were as follows:

- **Regular meetings of the Privacy Committee.** The Privacy Committee met regularly throughout 2024 to monitor compliance with prevailing data protection law and regulations by Atresmedia and to organise and establish compliance criteria.

- **Specific training on personal data protection in news content.** In 2024, a total of 254 employees from the Uniprex news service team received a training course on how to treat personal data when producing news content, with the aim of ensuring its proper use and minimising potential incidents. The cost of this training action came to EUR 810.

- **Annual training of the DPO.** In 2024, the DPO completed a refresher course under the certification scheme of the AEPD (Spanish Data Protection Agency). The cost of this course was EUR 1,200.

- **Modification of cookie notifications.** In 2024, the Atresmedia Group updated the notifications prompting users to accept cookies in digital content on several of the Group's corporate websites.

- **Conducting audits.** Atresmedia has drawn up annual sectoral data protection audit plans and operates a control management system headed up by those responsible for each of the processing activities that the personal data undergo. Through these procedures, the Data Protection Officer and the relevant areas ensure that all inventories of processing activities are subjected to regular controls and updates. The total cost of these audits for the Group was EUR 7,500.

- **Raising awareness of data protection through content and campaigns.** Fundación Atresmedia issued, together with the Spanish Data Protection Agency, the campaign No a la barra libre digital (No to the digital free bar), to warn families of the risks of giving their children early access to mobile phones. Through this action, both organisations are conveying a joint message to families to recommend that they hold back in giving their children a mobile phone. The campaign has been broadcast on all the Group's television channels and digital media, and on the social media sites of both entities. Meanwhile, as part of the Tolerancia Cero (Zero Tolerance) initiative, Sandra Golpe reported on the responsible use of devices by children, and a webinar was held alongside Fundación Madrileña on "Young people, mobiles and gender violence".

Atresmedia has formally approved processes and protocols setting out the procedure to be followed in the event of any incident related to personal data, such as the procedure for handling requests to exercise personal data rights, or the protocol on the duty to provide information and lawful basis for processing.

In carrying out these actions, the Data Protection Officer relies on Group-wide resources, with many actions being carried out in collaboration with other departments or areas

[50] *General Data Protection Regulation (GDPR).*

b Commitment to issues of major social concern

With the 21st century now in full swing, the media have a huge impact on society and act as a mouthpiece for transmitting messages to the wider population. Atresmedia treats this as an exercise in responsibility in providing reliable information and raising awareness, as we strive to make a valuable contribution to the growth and progress of the society in which we operate. Atresmedia is convinced that the media not only have a responsibility for reflecting society as it is, but also the capacity to bring about positive change within society, mainly through the content they broadcast.

The Atresmedia Group, as set out in its General Corporate Responsibility Policy, strives to produce and broadcast responsible news and entertainment content that reflects true diversity of society, contributes to its progress and growth, and helps to raise awareness of the need to combat climate change.

The problem with fake news: Fighting fake news_

Atresmedia Group, as a communicator and benchmark for news coverage through the Antena 3 Noticias and laSexta Noticias news programmes and the news aired on Onda Cero, is firmly committed to truthful, fact-checked information. For instance, it has robust mechanisms in place to ensure the truthfulness of the information and images it broadcasts and to provide the appropriate context to ensure that audiences properly understand what they are viewing or listening to. In 2024, both Antena 3 and laSexta continued to develop their news strategies to combat fake news and disinformation.

Noticias

Antena 3 Noticias follows a trusted strategy for fighting fake news, based on its commitment to truthful, fact-checked information. The newsrooms and professionals of Antena 3 combat hoaxes and disinformation on a daily basis by working hard to fact-check all information received, processed and broadcast. To facilitate this work and adapt to the new environment, in which we are seeing a relentless increase in unreliable information, *Antena 3 Noticias* now relies on AI tools to fact-check images, videos, audio and content.

In 2024, *Antena 3 Noticias*, under its brand Verifica A3N, stepped up its efforts to combat fake news on social media sites, especially Instagram and TikTok, both of which are highly vulnerable to fake news and disinformation. In doing so, the Group aims to reach out to the youngest and most sensitive public and to get them thinking critically by providing valuable, dynamic and interactive content.

This initiative complements the work already being carried out on the social media accounts of *Antena 3 Noticias, Espejo Público, Antena 3 Internacional* and on the Facebook and Twitter profiles of A3N Verifica.

Fact-checking is an ongoing activity that never stops. To succeed in these efforts and to ensure that citizens always have access to accurate and fact-checked information, these efforts are stepped up at specific times of huge demand for information, such as during elections, armed conflicts or natural disasters.

laSexta

laSexta also joined in the fight in 2024 by working to spot hoaxes and fake news. The laSexta Noticias newsroom works under the premise that all information broadcast must be fact-checked and provide full context, without omitting relevant versions or sections, striving to verify the information, videos and images shown and to detect and debunk hoaxes, while also ensuring the right to truthful, viewpoint diverse, independent and responsible information.

Through Newtral, a company specialising in content fact-checking, laSexta has a team of journalists specialised in fact-checking, who analyse and debunk hoaxes circulating on social media, apps or traditional media.

In 2024, laSexta began broadcasting Conspiranoicos, a programme focused on providing viewers with truthful information and debunking hoaxes related to current affairs currently circulating on social media. When it comes to the use of AI, laSexta Noticias is acutely aware of the risks and opportunities it presents and therefore uses it responsibly and ethically.

In addition, on both the *Antena 3 Noticias* and *laSexta Noticias* news programmes, violent images are broadcast sparingly and only where the image is genuinely needed to depict the situation. These images are displayed at the discretion of the management team, which assesses at all times whether or not it adds genuine meaning to the news. Similarly, images showing unjust situations or the cruelties of war will not be hidden. In any event, whenever the broadcasting of violent content is considered necessary, the viewer will be informed that they may find the images distressing prior to the broadcast.

Despite all the mechanisms put in place to fact-check the content broadcast, if it is detected that the Group has mistakenly disseminated false or erroneous news, the content is corrected and taken down as soon as possible, thus minimising any possible negative impact on the audience.

Corporate social responsibility initiatives: Ponle Freno, Constantes y Vitales, Levanta la Cabeza, Tolerancia Cero, Crea Cultura, Hablando en Plata and Luz Verde[51]_

Atresmedia launched *Ponle Freno* back in 2008 to help raise awareness of road safety, and since then the Company has promoted various initiatives aimed at channelling, in the most effective way possible, the transformative power and influence of television and radio on the behaviour and habits of our society. Several of these initiatives are carried out alongside Atresmedia's partners, including Fundación Axa and Fundación Mutua Madrileña.

Ponle Freno: the biggest social responsibility action undertaken by the Atresmedia Group alongside Fundación AXA

Ponle Freno is the largest ever social action to have been championed by the Atresmedia Group and indeed the biggest initiative undertaken by any company on the subject of road safety. It came about in 2008 with the aim of saving lives on the road and reducing the accident rate. Sixteen years down the line, it is still working tirelessly with the aim of reducing the number of road victims to zero. It is a cross-cutting initiative, as it is visible on all the Company's media and involves all its professionals and departments.

Ponle Freno was conceived as a call for social action, not only to raise awareness, but also to achieve tangible and meaningful change and as a call to action for citizens, government bodies and society at large. The initiative is coordinated by the Corporate Social Marketing department, which has all the resources it needs to carry out the actions and content plan. It also relies on the support of a commercial team to handle relations with the main partner, Fundación AXA, which, through its advertising investment, contributes the funding needed to carry out the various actions.

Key actions carried out in 2024 under this initiative include:

- ***Ponle Freno* Race:** with the aim of spreading the message of road safety awareness throughout Spain and supporting the victims of road

[51] *Atresmedia does not disclose the investment made in these actions due to reasons of confidentiality, as they are carried out together with other partners.*

accidents, the *Ponle Freno* race circuit was held in 10 different cities during the period, breaking all-time participation records with almost 35,000 registered participants and raising upwards of EUR 380,000, all of which was donated to various projects to support victims of road accidents. Atresmedia relies on digital platforms to measure the success of this initiative.

- ***Ponle Freno*-AXA Centre for Studies and Opinion:** to further broaden the road safety outreach and advocacy work carried out through the *Ponle Freno*-AXA Study and Opinion Centre, a survey was carried out in March 2024 to gauge the existing perception and knowledge of advanced driver- assistance systems, in which approximately 1,200 drivers took part. A new edition of the 3.0 Conference on the compulsory use of helmets on bicycles was also held during the year

- **16th edition of the Ponle Freno Road Safety Awards:** Atresmedia stages the *Ponle Freno* awards ceremony every year to recognise the hard work of all people, institutions and initiatives that have helped to promote road safety.

- **Road safety awareness campaigns:** four different campaigns were broadcast on Atresmedia's television, radio and digital channels in 2024: *¿Y a ti qué te pasó?, Las cincuenta fundamentales, Operación salida verano* and *Uso obligatorio del casco en bicicleta.*

- ***Operación Salida* podcast:** the third edition of its Operación Salida podcast (talking about the perils of everyone taking to the roads at the same time at the start of the holiday period) was launched, attracting almost 20,000 plays on the Group's main platforms.

In addition, *Ponle Freno* has a committee of road safety experts that meets regularly to decide on the topics to be addressed during the campaigns broadcast on radio and television. This ensures that the messages conveyed are rigorous, fact-checked and delivered with sensitivity, given the subject matter involved, always respecting the rights of the victims.

Constantes y Vitales: la Sexta's flagship corporate responsibility initiative alongside Fundación AXA to promote research, science and preventive healthcare

Since Constantes y Vitales was launched ten years ago, the Atresmedia Group and Fundación AXA have worked tirelessly to promote research and science, to showcase the work of researchers, and to bring science closer to society through dissemination, thus helping to provide the community with additional resources and funding and raising awareness of the importance of medical prevention to combat disease.

The initiative is headed up by the relevant department, which has all the resources it needs to carry out the actions and content plan. It also relies on the support of a commercial team to handle relations with the main partner, Fundación AXA, which, through its advertising investment, contributes the funding needed to carry out the various actions.

The main actions undertaken by Constantes y Vitales in 2024 were as follows:

- **Campaign to mark the occasion of World Rare Disease Day:** to help raise awareness of rare diseases by calling for more research and underscoring the need for early diagnosis. The campaign was helmed by journalist Jordi Évole and was broadcast on radio, television and digital channels, reaching out to 18 million viewers.
- **Communication campaign on the 10 years of *Constantes y Vitales:*** to highlight the milestones and successes achieved during this decade of commitment to science, research and OHS. Helmed by Mamen Mendizábal and featuring 11 personalities from the world of science who sit on the Constantes y Vitales committee of experts, the campaign has been aired on television, radio and digital media and reached almost 23 million people during the period.
- **Interviews with renowned experts in the section *Conversaciones Constantes y Vitales* on *La Brújula* radio show aired on Onda Cero:** aspects such as the prevention of various types of cancer and the huge problem of mental health are discussed, are as major scientific breakthroughs and advances in different realms. This programme has an average audience of 450,000 listeners.
- **10th edition of the *Constantes y Vitales* Awards for biomedical research and preventive healthcare:** aimed at recognising, showcasing, supporting and strengthening the invaluable research and preventive healthcare work carried out by Spanish scientists in the last year.

The team behind the actions of Constantes y Vitales is also advised by a committee of experts, made up of Spanish scientists who pick the topics to be addressed and the approach to be taken to ensure that the information is treated with all the rigour it deserves.

Levanta la Cabeza, for the sustainable digitalisation of society

Launched in 2018, *Levanta la Cabeza* seeks to promote the sustainable digitalisation of Spanish society by fostering the rational, responsible, constructive and positive use of technology, focusing on three central pillars: security, responsibility and universality. To make this happen, the Group publishes daily content through its own platform, levantalacabeza.info, and its social media profiles. The aim is to provide rigorous, educational and easy-to-digest information on various issues related to the digital world, including advice on how to ensure the sustainable and safe use of technology. Some of the main topics covered are cybersecurity, the use of AI, the digital divide, the relationship between young people and technology, and the importance of spotting and debunking fake news.

In 2024, *Levanta la Cabeza* continued to spread the word and an analysis was carried out in-house to reflect on the role that the initiative should play in the coming years. More precisely, Atresmedia engaged the services of a specialised consulting firm to update the design and content of the website to include more innovative formats, a weekly newsletter and a more accessible design. This was accompanied by a powerful communication campaign to make this platform the go-to website for anyone interested in understanding the new challenges and opportunities posed by digitalisation. Atresmedia also has a committee of experts who share their different views and advise the platform on the latest technological trends, in order to identify the most relevant issues to be addressed by the initiative.

Tolerancia Cero, taking the fight to gender-based violence

Contra el Maltrato Tolerancia Cero was launched in 2015 as a partnership between Fundación Mutua Madrileña and Antena 3 Noticias with the aim of raising awareness of, and supporting the fight against, gender-based violence, featuring a roster of widely renowned news presenters.

This initiative mainly takes place on the set of *Antena 3 Noticias*, one of the Atresmedia Group's most emblematic sites. There, the news team and its

presenters keep the fight against gender-based violence alive by denouncing this social blight and showcasing the resources and channels that victims can use to report it.

Aside from the efforts made on set to raise awareness and condemn this scourge, *Antena 3 Noticias* and Fundación Mutua Madrileña have launched several other actions under the umbrella of *Tolerancia Cero* to gain the upper hand in the fight against gender-based violence. Key actions along these lines in 2024:

- **Continuation of *Municipios contra el Maltrato*,** in which more than 400 municipalities took part in to promote victim protection schemes, training for citizens, on-the-street information and events against gender-based violence. In 2024, the Group launched a special campaign to raise awareness among young people of the need to be especially wary at big summer parties.
- **Holding of the 1st *Tolerancia Cero* Round Table of Experts,** to discuss the underlying causes of the abuse and to tackle them through the various *Tolerancia Cero* initiatives that are carried out throughout the year.
- **Holding of the 2nd webinar titled 'Youth, mobiles and gender violence'** aimed at students from 13 to 16 years old, which can be viewed for free at *jovenescontracontraelmaltrato.com.*
- **Alliance with the National Police, Guardia Civil and the Spanish Data Protection Agency** to launch specific campaigns featuring messages from these expert opinion leaders, who appeared on screen alongside the Group's own presenters.
- **Staging of the 4th Conference against Abuse,** with the involvement of some big names from the social, political and legal communities, along with representatives of Atresmedia and the Fundación Mutua Madrileña. The participants called for a social pact to stop sexual violence against minors on the Internet.
- **Staging of the 5th Macro-study on the perception of gender-based violence,** the main finding of which is that *"More than 70% of the population supports greater control over minors' access to the Internet and social media."*

Hablando en Plata, committed to the elderly

Hablando en Plata came about in 2022 as a cross-cutting initiative of Atresmedia Televisión to fight against ageism, showcase the value and worth that the elderly bring to society and raise awareness of the problems they face. Atresmedia aims to achieve three main objectives with the aim of improving the lives of senior citizens aged over 55:

- Leading a social movement to raise awareness, which will help to combat the ageism that is taking root in our society.
- Increasing the perceived value of this segment of society.
- Supporting older people by placing their concerns at the centre of the debate.

Hablando en Plata is an integral part of the Group's own content, appearing regularly in news and current affairs programmes and in three prime time specials aired on Antena 3, and featuring the Group's main faces and opinion leaders. It also has its own website and profiles on social media offering useful information for senior citizens.

In 2024, the initiative was awarded the Platform for the Elderly and Pensioners Award in the category of 'Media and Social Image', for *"raising awareness of the reality of this heterogeneous social group by placing the various problems they face squarely on the public and media agenda."*

The following actions were carried out in 2024:

- **Earning AENOR certification** as television committed to the elderly, with Atresmedia Televisión being the only television division in Europe to have earned this accolade.
- **Awareness campaigns:** cas part of this initiative, the Atresmedia Group launched various awareness campaigns in 2024, including: the broadcast of a piece on the ban placed on banks from charging fees to over-65s for withdrawing cash over the counter; various short pieces condemning ageism as a form of exclusion; and two spots highlighting the fact that many scientific, medical and sporting achievements have been made by people aged over 55, and encouraging people to

reflect on what society would now be missing had such individuals not been around. Last but not least, to mark the occasion of World Elder Abuse Awareness Day, *Hablando en Plata* aired a series of bumpers to showcase certain forms of abuse such as social marginalisation, digital exclusion, or the lack of care in old people's homes.

- **Broadcasting of the third special of Hablando en Plata titled ¿Cómo ganar años de vida?,** with Sonsoles Ónega and Alberto Chicote on hand to promote healthy longevity.

- **Continuous broadcasting of content on topics or issues of special interest to the elderly** on news and current affairs programmes.

- **Training event on ageism for different professionals and journalists** of the Group, delivered by the director of the Chair on Ageism at the University of Vigo. The aim was to learn more about the problem and its impacts and to ensure that they receive the attention they deserve by the media.

- **Drafting of an internal document containing various recommendations to avoid ageism** in the Group's communications.

- **Campaign alongside Johnson & Johnson** to raise awareness of multiple myeloma and the importance of getting information from healthcare professionals.

- **Signing of a partnership agreement with digital newspaper *65ymas*,** a publication specialising in the senior public. Both entities have joined forces to double down on their shared commitment to showcase the value of the elderly and the difficulties they face.

Crea Cultura, arousing society's interest in culture and reading

Crea Cultura is an initiative that came about in 2018 to promote and arouse an interest in culture among the population, while also supporting all the professionals who belong to this sector by defending authors' rights.

Within the broader *Crea Cultura* initiative, *Crea Lectura* carries out valuable work within the publishing market to awaken and nurture a love for reading among the public. Through its website, the Group offers valuable information and literary recommendations, along with first readings, new additions, prizes, and news and curiosities from the publishing world. *Crea Lectura* also happens to have a special programme on atresplayer dedicated to literature and books, with the aim of recognising the immense value of intellectual property and supporting creators and their works.

Radio station Onda Cero turns on the *Luz Verde* (Green Light) for sustainability and to combat climate change.

In March 2024, Onda Cero launched its new corporate social responsibility initiative *Luz Verde*. Through campaigns, messages, reports and interviews across all its programmes, *Luz Verde* aims to get listeners involved in combating the degradation of our planet, fighting climate change, becoming more resilient to its effects and making the defence of the environment a cross-cutting issue that permeates all of its programming.

The team behind this initiative relies on the advice of the WWF and is supported by all the channel's communicators. Under the slogan *"Onda Cero listens to the climate"*, they lobby for environmental respect from their respective programmes and shows, focusing on actions that improve the health of the planet and condemning those that damage the natural environment.

The main actions carried out in 2024 under this initiative were as follows:

- **Messages launched across the different shows of Onda Cero** doubling down on the importance of combating climate change on emblematic radio shows such as *Mas de Uno, Julia en la onda* and *Radioestadio Noche*.
- **Setting up of the *Luz Verde* Committee of Experts,** tasked with drawing up a set of guidelines on how to keep the initiative current and up to date. The committee comprises Atresmedia professionals specialised in the environment, meteorology and sustainable tourism.
- **Celebration of World Environment Day.** To mark the occasion, Onda Cero broadcast more than fifty pieces on the importance of environmental protection, including interviews, reports, bulletins and shorts, and practical advice for its listeners, addressing topics such as CO_2 emissions, extreme climate change, energy saving, and proper waste management.

In 2025, Onda Cero, together with WWF, will celebrate the first *Luz Verde* awards to recognise those people or institutions whose initiatives helped to improve sustainability and take the fight to climate change in 2024.

Broadcasting on social and environmental concerns: social and climate mouthpiece_

Atresmedia's objective is not only to inform in an honest and factually-accurate way, but also to raise awareness through all of its programmes, whether through its content or its advertising spaces.

- **Broadcasting of free campaigns for NGOs:** Ethe Atresmedia Group has been offering NGOs free advertising space for more than fifteen years. Thanks to this initiative, the Group achieves a dual purpose: first, it allows NGOs to showcase their causes and benefit from Atresmedia's media outreach; and second, it helps to raise awareness among audiences about these worthy social causes by offering them the opportunity to get involved. In 2024, the Group broadcast a total of 40 social campaigns, with a total value of EUR 22.9 million. Atresmedia also aligns these campaigns with the Sustainable Development Goals so as to measure its contribution to the 2030 Agenda. Examples of these campaigns in 2024:

1 FIN DE LA POBREZA	Campaign of the RAIS Foundation (SDG 1 – No Poverty), highlighting the plight of homeless people and the aspiration for nobody to be homeless by 2030.
2 HAMBRE CERO	Educo campaign (SDG 2 – Zero Hunger), to promote its canteen scholarship programme to ensure that vulnerable children have access to decent food.
8 TRABAJO DECENTE Y CRECIMIENTO ECONÓMICO	Campaign of Fundación Quiero Trabajo (SDG 8 – Decent Work and Economic Growth): helps vulnerable women by providing them with the tools they need to find work.
14 VIDA SUBMARINA	Campaign of Fundación Ecomar (SDG 14 – Life Below Water), focused on raising awareness and care for our seas and oceans.

- **Support for the Emergency Committee:** the Atresmedia Group has been lending its full support to the Emergency Committee since 2015 by broadcasting, via all its communication channels (television, radio and digital platforms), appeals for public support in response to crisis events detected by the Committee. It offers society all the information it needs to help out in each case. In 2024, Atresmedia teamed up with the Committee to support the humanitarian crisis in Lebanon.

- **Support for the Red Cross to assist the victims of the flash floods:** in 2024, the Group supported the Red Cross in its fund-raising endeavours by broadcasting the campaign on its shows, news programmes and advertising spaces, giving the audience valuable information on how to channel their aid and make donations. During the broadcasting time of this campaign, Atresmedia helped to raise more than EUR 38 million in donations.

- **Broadcasting of information on climate change and its effects and special coverage of the flash floods:** in 2024 Atresmedia continued to broadcast content to raise awareness among society about the importance of fighting climate change and taking good of the environment, as well as promoting sustainable habits to make us all more resilient to the negative impacts of climate change. In addition, both laSexta and Antena 3 broadcast special shows covering the flash floods. In 2024, Atresmedia devoted 395 hours of programming to climate content.

- **Broadcasting entertainment and campaigns that reflect the diversity of society:** Atresmedia, by broadcasting content and entertainment, aims to serve as a mouthpiece for different groups and show its audiences the true richness of diversity. Key broadcasts here include: *Drag Race, Las Noches de Tefía* or *Lumelia*. Also in 2024, Atresmedia launched the campaign Donde estamos todos to celebrate Pride month, focusing on the importance of LGBTIQ+ representation in fiction and in the media, as well as the impact that these stories have on viewers when they need role models.

Media, information and digital literacy_

The Atresmedia Group, through the work of its foundation, Fundación Atresmedia, undertakes projects to promote the **media, information and digital literacy of children and young people.** In doing so, it involves families, educators and society as a whole in this task and covers one of the most pressing concerns at present: the exposure of children and young people to the risks of the media and digital environment and their need to acquire essential skills to manage it critically, safely and responsibly.

By carrying out its activities and helping to develop media and information literacy skills across all segments of society, Fundación Atresmedia enables the Atresmedia Group to comply with the requirements set out in the General Audiovisual Media Law.

In 2024, Fundación Atresmedia pressed ahead with its media, information and digital literacy projects for children, young people and their families, while also carrying out awareness campaigns to promote the protection of children's digital rights. The main actions carried out during the period are as follows:

FOR YOUNG PEOPLE:

***Efecto MIL* (3rd edition):** a competition for young people aged 16 to 25 to promote the positive use of social media and get young people involved in raising awareness of the digital risks that exist around them. A total of 661 young people took part with 358 videos, garnering 270,000 views on social media sites.

Amiflash: a social media channel that offers young people short news briefings on media and digital risks, posted weekly by young journalists from Atresmedia.

FOR CHILDREN AND FAMILIES

Amibox: educational audiovisual content for children aged 6–15 and their families, available on atresplayer, YouTube and social media. Amibox attracted 1.73 million views in 2024, with 40 new chapters produced during the period, bringing the total to 162 chapters.

FOR TEACHERS:

Mentes AMI: a project with two components: annual awards to recognise efforts to promote media, information and digital literacy in the classroom (487 schools with 316 projects took part in 2024), and an annual meeting for teachers on media and information literacy. The 3rd Mentes AMI event was attended by 950 people in person and streamed by a further 9,270.

Amibox-Aula: an online guide for teachers, aligned with the LOMLOE education law, enabling teachers to target media, information and digital skills in the classroom. It recorded more than 8,000 teachers and was used by more than 37% of primary and secondary schools in Spain.

SOCIAL AWARENESS CAMPAIGNS:

Menores de edad, no de derechos digitales alongside Unicef Spain, and ***No a la barra libre digital*** with the Spanish Data Protection Agency, both broadcast on Atresmedia media to raise awareness of the need to protect the digital rights of children and adolescents.

In 2024, the Atresmedia Group made a financial contribution of EUR 500,000 to finance the activities carried out by Fundación Atresmedia.

The following section explains how the actions described above are aligned with the objectives set out in the policies, the stakeholders affected in each case, and the targets set to achieve them:

Actions to protect audiences and advertisers				
Domain	**Policies and objectives**	**Actions**	**Affected stakeholders**	**Targets**
Brand Safe and responsible advertising	This action mirrors the objective of providing a safe space for brands and protecting audiences, as set out in the Responsible Advertising Policy and the CR Policy	Internal and external advertising content control mechanisms	Advertisers and audiences	General objective with no specific targets
Protection of minors	These actions are consistent with the broad objective of the General Corporate Responsibility Policy to protect minors	Content rating system	The audience, more precisely minors	General objective with no specific targets
		Parental control		
		Specialised content aimed at children		
Accessible content	These actions are aligned with the objective of the General Corporate Responsibility Policy of offering accessible content for everyone	Audio-description, signing, subtitling and closed captioning of television content and atresplayer	The audience, more precisely people with visual and hearing impairments	See section S4-5
		Using AI to improve accessibility		General objective with no specific targets
		Accessible QR on the news		
Personal data protection	These actions are aligned with the objectives of the General Data Protection Policy	Regular committee meetings and audits	Audiences (including website users)	General objective with no specific targets
		Broadcasting awareness campaigns	Audiences	

Actions related to Atresmedia's commitment to the issues of greatest social concern				
Domain	**Policies and objectives**	**Actions**	**Affected stakeholders**	**Targets**
The problem with fake news: Fighting fake news	These actions are in line with the principles set out in the codes of ethics and the objective of offering truthful and fact-checked information	Daily actions by newsrooms to combat fake news	Audiences	General objective with no specific targets
Corporate social responsibility initiatives	These actions are in line with the objective set out in the General Corporate Responsibility Policy to contribute to the progress and development of society	*Ponle Freno*	Audience and advertisers through joint campaigns	Annual objectives with no associated quantitative targets
		Constantes y Vitales		
		Levanta la Cabeza		
		Tolerancia Cero		
		Hablando en Plata		
		Crea Cultura		
		Luz Verde		
Broadcasting on social and environmental concerns: social and climate mouthpiece	These actions are in line with the objective set out in the General Corporate Responsibility Policy to contribute to the progress and development of society	Broadcasting of free campaigns for NGOs	Audiences and social entities	See section S4-5
		Support for the Emergency Committee	Audiences and social entities	General objective with no specific targets
		Support for the Red Cross	Audiences and social entities	
		Broadcasting of information on climate change and its effects	Audiences	
		Broadcasting of entertainment content and campaigns reflecting diversity	Audiences	
Media and information literacy		Atresmedia Foundation Projects (Mentes AMI, Efecto MIL, Amibox, Amiflash and Amibox-Aula)	Children, young people and the educational community	See section S4-5
		Creation and dissemination of awareness-raising content on MIL and digital rights	Younger audiences S4-5	See section S4-5

The consolidated amounts of CapEx during 2024 are disclosed in Note 6 "Other intangible assets" and Note 7 "Property, plant and equipment", while relating to OpEx are discussed in Note 18 "Income and expenses", specifically section d) Other operating expenses, of the consolidated financial statements.

METRICS AND TARGETS

S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities_

To monitor its objectives, Atresmedia sets quantifiable and measurable goals and indicators for issues such as:

Targets related to the Group's accessibility objectives_

As part of its commitment to accessibility, Atresmedia regularly measures data on sign language for the deaf, subtitling, closed captioning and audio description of the content it broadcasts. Ever since the entry into force in 2023 of the accessibility requirements of the General Audiovisual Media Law, the Group has gone beyond the minimum requirements regarding subtitling and closed captioning, audio description and sign language. Further details of the Group's commitments and monitoring in relation to content accessibility are provided below.

Target 1. Subtitle and close caption at least 92% of the content broadcast on television. This target exceeds the 80% required under the General Audiovisual Media Law. The Atresmedia Group monitors this indicator on a monthly, quarterly and annual basis, which also happens to form part of the variable remuneration plan for the Group's executive directors. With this target, the group aims to ensure that its content is inclusive and accessible to people with hearing difficulties. Atresmedia comfortably meets this goal each and every year and has exceeded 90% of subtitled television content since 2018.

Subtitling and closed captioning on television	N° of hours of subtitled content
Antena 3	6,913.07
laSexta	7,000.55
MEGA	6,896.35
Neox	7,035.21
Nova	6,786.44
Atreseries	7,034.42
Total hours	41,666.04
% of 24 hours	93.90%

Target 2. Exceed the minimum requirements of the General Audiovisual Media Law regarding signed and audio-described content (minimum of five hours per week of signed and audio-described content according to the law). Atresmedia monitors this target on an annual basis..

Accessibility of television content – 2024	Content with sign language		Audio-described content	
	Total number of hours – 2024	Average hours per week – 2024	Total number of hours – 2024	Average hours per week – 2024
Antena 3	403.74	7.76	384.43	7.39
laSexta	521.60	10.03	395.33	7.60
MEGA	513.41	9.87	503.67	9.69
Neox	405.26	7.79	1.003.47	19.30
Nova	427.29	8.22	426.27	8.20
Atreseries	548.36	10.55	549.56	10.57
Total hours	2.819.67	54.22	3.262.73	62.74

Targets related to Atresmedia's impact on the community._

Target 1. Broadcast a minimum of 25 free NGO campaigns per year to raise awareness of their social causes. For more than 15 years, Atresmedia has been granting free advertising space to NGOs for its three media outlets: radio, TV and digital channels. The Group has pledged to broadcast a minimum of 25 free campaigns in 2024, 2025 and 2026, worth at least EUR 18 million per year.

This indicator is also linked to the variable remuneration of the executive directors of the Atresmedia Group, as explained in section G1-1. In 2024, a total of 40 campaigns were broadcast for the benefit of 30 NGOs, worth a total of EUR 22.9 million.

Target 2. For 100% of the campaigns broadcast to be accessible to people with hearing and visual disabilities. Since 2020, all the free campaigns for NGOs broadcast on the Atresmedia Group's channels have been subtitled, as an essential requirement for their broadcasting. Certain spots may also need to be audio- described. In 2024, 100% of the free-to-air campaigns broadcast on the Atresmedia Group's channels were subtitled, thus meeting the target. Atresmedia continuously monitors this target.

Campaign investment	
TV investment (EUR)	EUR 9,924,245
Radio investment (EUR)	EUR 12,904,235
Digital investment	EUR 153,147.36
Total investment	**EUR 22,981,627.36**

Advertising space for NGOs	
N°of campaigns broadcast	**40**
N° of beneficiary NGOs	30
Campaigns subtitled	100%

Targets related to media, information and digital literacy and the work of Fundación Atresmedia_

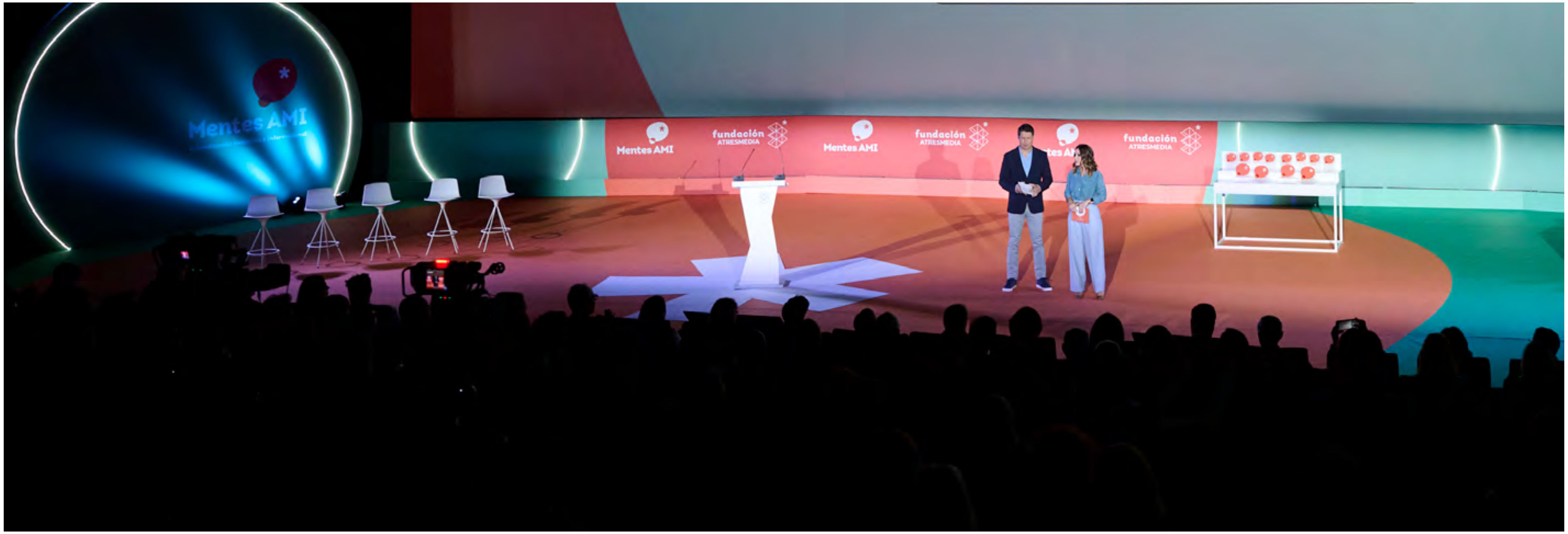
The Company is currently working to establish the targets needed to achieve the objectives set for Fundación Atresmedia through its Action Plan.

Target 1. Increase the outreach of the *Mentes AMI* event and awards. PThe Atresmedia Foundation relies on various indicators, notably: increasing the number of projects entered into the *Mentes AMI* Awards in 2025; the number of teachers signed up to attend the event as a show of interest in the project; and achieving full attendance at the event.

Target 2. Provide teachers with tools to improve their MIL skills. To make this happen, Fundación Atresmedia tracks various indicators, including: achieving a significant percentage of teachers taking part in the Mentes AMI event who claim to have obtained useful MIL tools they can use in the classroom; and a significant percentage of participating teachers who say they will incorporate new MIL concepts into their teaching practices.

Target 3. Increase the outreach and impact of the *EFECTO MIL* project to champion the good use of social media among young people. To achieve this, Fundación Atresmedia watches a series of indicators, such as exceeding the number of videos submitted in 2025 by young people aged between 16 and 25, and reaching 30,000 views.

Target 4. Providing classrooms with useful tools to pass on the MIL skills to learners. To succeed, Fundación Atresmedia tracks various indicators, including: achieving a significant number of educational centres registered as users of the Amibox-Aula educational guide.



4 Governance information_

ESRS G1

4.1 BUSINESS CONDUCT

4 Governance information_

ESRS G1

4.1 BUSINESS CONDUCT

Atresmedia has a firm commitment to upholding high standards of business conduct and corporate culture, adopting practices such as anti-corruption and anti-bribery, responsible supplier management, and transparency in its activities and commitments in relation to political influence.

GOVERNANCE

NEIS 2 GOV-1 **The role of the administrative, management and supervisory bodies_**

Atresmedia Group is firmly committed to good governance, transparency and efficiency in carrying out its operations, following the ethical principles guiding the conduct of all members of the organisation, including the administrative, management and supervisory bodies.

The role of the Board of Directors and the Audit Committee_

In relations with stakeholders, Atresmedia's Board of Directors ensures that the Company respects prevailing legislation and the principles of social responsibility it has voluntarily embraced, endeavouring to reconcile its own corporate interest with the legitimate interests of its employees, suppliers, customers and other relevant stakeholders that could be affected.

For its part, the Audit and Control Committee plays a key role in overseeing compliance with corporate governance rules, internal codes of conduct and the General Corporate Responsibility Policy, which provides guidelines for social and environmental conduct. This committee conveys to the Board of Directors the concerns of stakeholders that come to its attention while exercising its powers, which can cover material topics from the Whistleblowing Channel, as well as matters notified through other communication mechanisms provided by the Group to stakeholders as set out in the various corporate policies. The committee oversees the Whistleblowing Channel, which it does through the activity reports of the Compliance Committee, as well as compliance with internal rules and regulations, including the Policy on the Disclosure of Financial, Non- Financial and Corporate Information, the General Corporate Responsibility Policy, and the Corporate Governance Policy.

Expertise of the Board of Directors in business conduct_

In 2023, the Appointments and Remuneration Committee reviewed the director skills matrix, which is a key tool for identifying needs related to the composition and profiles of the administrative bodies. Based on the findings of this review, new relevant competencies were added to reinforce the quality of the Board's composition, e.g., cybersecurity, separating it from expertise in finance and risk to specifically address non- financial risks. In addition, competencies in sustainability were expanded to cover expertise in areas such as the environment, climate change, human resources, remuneration, diversity, talent, social action, corporate governance and compliance.

In 2024, in the light of developments in regulations occurring during the year—especially Organic Law 2/2024, of 1 August, on equal representation and balanced presence of men and women and the CNMV's Technical Guide on Audit Committees—and changes to the composition of the Board of Directors and Board committees from the previous reporting period, the Appointments and Remuneration Committee conducted a new review of the internal documentation dealing with issues related to administrative bodies' composition and diversity. This included the skills matrix. Individual director competencies were reviewed in 2023 based on the criteria of the new matrix and updated in 2024. Based on the new review, as of 31 December 2024, seven of the 12 members of the Board of Directors had competencies in sustainability according to the new description, which includes competencies in corporate governance and regulatory compliance, and two directors have competencies in cybersecurity.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities_

Regarding the process used by Atresmedia to identify material impacts, risks, and opportunities in relation to business conduct, see disclosure requirement related to ESRS 2 IRO-1, which lists the four phases of the double materiality assessment: understanding, identification, assessment, and determination.

Set out below is a summary of the material impacts, risks and opportunities identified in that process by material topic:

	IROs	DESCRIPTION	POLICIES
	Good governance and business ethics		
POSITIVE IMPACT	Environmental, social and governance policies and commitments	The updating and improvement of good corporate governance by applying the principles set out in Atresmedia's General Corporate Responsibility Policy, applying best market practices, and acting on the recommendations of regulatory bodies, such as ESMA or the CNMV, have a positive impact for the Group, enhancing its reputation and building more confidence among stakeholders.	• General Corporate Governance Policy • General Corporate Responsibility Policy
POTENTIAL RISK	Non-compliance with commitments or failed evaluation and oversight system	Non-compliance with voluntary commitments undertaken or a failed evaluation and oversight system implemented by the Group could expose the Group to reputational risks and a loss of confidence among its stakeholders.	
POTENTIAL RISK	Competitive landscape with increasing regulation	Failure by Atresmedia to adapt its internal processes to its new competitive landscape, which features regulation to a greater extent, could pose risks of non-compliance, with financial implications for the Group.	
OPPORTUNITY	Investment in social entrepreneurship	Atresmedia identified a business opportunity in investments in social startups (e.g., Cuideo, Saldados) and mediapartnerships that embed social and environmental concerns in their business models.	
POTENTIAL RISK	Failed due diligence processes	Investments in startups can pose financial risks derived from the businesses' greater instability and potential failures in the due diligence process.	

	IROs	DESCRIPTION	POLICIES
	Cybersecurity		
POSITIVE IMPACT	Information Security Model (ISM)	Thanks to Atresmedia's robust Information Security Model (ISM), as well as its commitment to security, information, and early warning systems and detection, the Company's stakeholders operate in a secure digital environment, with minimal likelihood of cyber risks materialising.	• Information Security Policy
POTENTIAL RISK	Non-compliance with emerging regulation	Non-compliance with current or future cybersecurity laws and regulations could result in economic sanctions for the Group.	
	Regulatory compliance		
POSITIVE IMPACT	Regulatory Compliance and Crime Prevention Model	Atresmedia's Regulatory Compliance and Crime Prevention Model is a flexible, comprehensive and effective instrument for extending a culture of compliance and a preventive approach to all areas of the Group's companies, helping to reduce the appearance of risks related to regulatory non-compliance and the commission of offences .	• Regulatory Compliance and Crime Prevention Model • Code of Conduct Anti-corruption Protocol
POTENTIAL RISK	Regulatory changes	Significant changes in regulation or in interpretations of existing accounting, tax, criminal, labour, competition and data protection regulations, not to mention the audiovisual and advertising industry's regulations, coupled with the need to adapt to the new environment could pose strategic risks for the Group that affect its business performance.	
POTENTIAL RISK	Failed control mechanisms	Failure in content broadcasting control mechanisms could result in risk of non-compliance with audiovisual regulation.	
	Sustainable investment		
OPPORTUNITY	Access to sustainable finance	Atresmedia understands access to sustainable finance as a financial opportunity, which also contributes to generating positive impact on society. A case in point is the syndicated loan taken out by the Group in 2021 in which it negotiated better financing terms linked to compliance with four ESG indicators.	
OPPORTUNITY	Response to sustainability indices	The Group's response to different sustainability indices (MSCI, S&P, CDP) can provide an opportunity for enhancing the Group's reputation and attracting new investor interest, as well as identifying actions that help improve its performance.	

G1-1 Business conduct policies and corporate culture_

Atresmedia's system of corporate governance ensures that the Group's activities are performed within a stick framework of legal compliance and responsibility. This system is aligned with values, e.g., commitment, quality and accountability, all of which are fundamental pillars of good governance and the Atresmedia's corporate culture. It includes the procedure for decision-making in the Group and is based on Atresmedia's General Corporate Governance Policy, comprising governance and administrative bodies, as well as a series of rules and legal provisions to ensure its proper functioning and control. Moreover, this system strengthens stakeholder engagement, ensuring that their expectations and needs are managed appropriately.

Policies in relation to business conduct_

Our internal orporate governance policies and rules (by-laws, regulations and policies), along with access to the Whistleblowing Channel and its rules of procedure, are available on the Atresmedia website.

1 RULES AND REGULATIONS GOVERNING THE CORPORATE AND COMPLIANCE BODIES:

These govern composition, remit, and rules of operation, among other aspects.

- Corporate By-laws
- General Shareholders' Meeting Regulations
- Regulations of the Board of Directors
- Regulations of the Regulatory Compliance Committee

2 CORPORATE POLICIES:

- General Corporate Governance Policy
- General Corporate Responsibility Policy and supplementary policies (Human Resources, Environment and Climate Change, DEI (diversity, equity and inclusion) and Responsible Advertising
- Director Remuneration Policy
- Policy on the Disclosure of Financial, Non-Financial and Corporate Information and Shareholder and Investor Contact Information
- Corporate Tax Policy
- Risk Policy
- General Policy of the Internal Reporting System
- Policy on the Responsible Use of Artificial Intelligence and Related Technologies
- General Data Protection Policy
- Channel Privacy Policy

3 CODE OF CONDUCT

4 COMPLIANCE AND CONTROL PROTOCOLS AND PROCEDURES INCLUDED IN THE REGULATORY COMPLIANCE MODEL:

- Anti-corruption Protocol[52].
- Disciplinary system of the Regulatory Compliance and Crime Prevention Model
- Protocol for handling situations involving criminal risk
- Protocol for handling breaches of the Compliance Model
- Procedure on handling reports of breaches
- Protocol on the acceptance and giving of gifts
- Internal rules of conduct on stock market-related issues
- Protocol on occupational health and safety
- Protocol on notification management
- Protocol on scrutiny and approval of related party transactions
- Protocol on managing powers of attorney and use of electronic certificates
- Protocol on recruitment of executives, sales staff, and employees
- Corporate information security policy and drafts policies comprising the ISM structure, as well as associated technical and control procedures.
- Protocol on use of ICT resources and cybersecurity
- Protocol on risks on the possible use of audiovisual material without rights
- Protocol for handling tax-significant transactions
- Protocol on brand management
- Protocol on domain management
- Procedure for handling reports of breaches of the Whistleblowing Channel.

[52] *Atresmedia's anti-corruption protocol is consistent with UN Convention against Corruption.*

Of these policies and standards, notably the Code of Conduct provides a general description of the policies, principles, objectives and values considered necessary and crucial by the Group for its overall success, as well as for strengthening its presence in society.

As noted, ultimate responsible with regard to the interpretation and application of the Code of Conduct rests with the Compliance Committee, composed of representatives from Corporate General Management, Finance, Regulatory Affairs and Institutional Relations, Internal Audit and Process Control, and Legal Affairs.

This illustrates the cross-cutting nature of compliance and business conduct issues and the importance Atresmedia Group attaches to matters related to good governance and business ethics.

In line with the results of the double materiality assessment and in the light of market trends, the Group is increasingly focusing on governance of cybersecurity, digital transformation, and artificial intelligence (AI), the business opportunities they present as well as the associated risks (e.g., legislation, competition, violations of digital rights, etc.). The aim is to ensure that managing these areas contributes to a secure, ethical operating environment that is aligned with prevailing regulations.

The is a specific risk category for cybersecurity matters in the corporate risk map. Atresmedia Group is currently studying how to incorporate threats arising from the use of AI into its risk map, since this is a cross-cutting topic that could pose risks to the business model (especially in relation to intellectual property) and non- compliance with AI regulations, as well as failed processes due to incorrect usage.

Cybersecurity

The **Corporate Information Security Policy** lays the foundations underpinning the Group's Information Security Model (ISM). The policy formalises Atresmedia's commitment to ensuring a secure digital environment and outlines the objectives and guiding principles on the Company's operations. Strategically, cybersecurity aims to add value at all levels of the organisation (users, employees, and shareholders) by fostering a secure environment and enhancing brand reputation.

Atresmedia's main cybersecurity objectives are:

- To demonstrate its commitment to protecting the organisation's information assets.
- To establish the information security governance framework.
- To formalise the principles and standards that must be upheld to ensure that this commitment is reflected in all operational, commercial, and business processes, as well as to support the Group's IT strategy.

The objective of the **ISM** is to manage information security across the Group, coordinating actions between the Cybersecurity and Technical areas to ensure a secure environment for information and critical systems. This model is predicated on early incident detection and a cycle of continuous improvement comprising four stages (planning, doing, checking, and acting), allowing for ongoing evaluation and the introduction of new improvements.

The ISM also includes an incident management procedure designed to minimise and detect cyber risks that could affect operations or reputation. Moreover, under the Group's governance, risk, and compliance (GRC) system, the Cybersecurity area and the relevant technical areas have specific controls in place to mitigate these risks. Activities carried out in 2024 focused on consolidating and strengthening cybersecurity support services so that Atresmedia Group has a solution that is fully tailored to its specific needs. This solution comprises orchestrated and connected services covering all IT assets within Atresmedia. The overarching objective is to detect and resolve vulnerabilities and incidents, preventing attacks that could compromise the organisation's services.

Furthermore, Atresmedia implemented a phishing awareness plan to raise awareness among its employees. This plan consisted of 11 campaigns, with a total of 47,021 emails sent to 2,589 subjects. The Group also offers a Cybersecurity Training Programme for 2,500 employees, distributed across 12 modules of three lessons each, and a test of the level of knowledge of the subject taught.

Digital transformation and artificial intelligence

Advances in the field of technology and the expansion of AI tools are driving rapid, constant, and significant changes that affect companies' reality. Atresmedia is working to speed up its adaptation to the new paradigm, as well as prepare itself to seize opportunities and handle the risks associated with the use of AI.

As part of its business strategy, the Company implemented transformation plans and projects enabling it to leverage technology, becoming more flexible and efficient while continuously enhancing its business processes in terms of content generation and at corporate level.

Given AI's evolution and potential, Atresmedia continues to explore ways to integrate different tools into its day-to-day operations, while ensuring at all times that they are used ethically and responsibly.

In this context, the Group drew up its first **Policy on the Responsible Use of Artificial Intelligence and Related Technologies** in 2023. This policy outlines commitments and principles to ensure the secure, responsible, and transparent use of AI tools, particularly large language models (LLMs). The Group has an **Artificial Intelligence Committee,** which meets regularly to address key AI-related issues.

Since 2024, Atresmedia has supported the **Forética Manifesto for a Responsible and Sustainable Artificial Intelligence** and subscribes to its five principles and specifications, which guide companies in their journey towards responsible and sustainable AI.

In 2024, specific AI tool use cases were implemented across several Company areas, seeking competitive advantages and effective results to optimise the business and business processes. A case in point was the use by *Antena 3 Noticias* and *laSexta Noticias* of AI tools to combat misinformation and fake news. Additionally, in the field of inclusion, the Group has been leveraging AI tools since 2023 to make its content more accessible, while it continues explore potential applications of these tools in content audio description and sign language.

In a bid to stay at the technology forefront and use AI tools safely and effectively at work, the Group is also offering employees AI training to help them understand its advantages and risks.

Corporate culture_

Atresmedia has a responsibility to be there for society by communicating and information in a responsible manner and guaranteeing genuinely diverse, truthful and accessible content. Atresmedia Group's corporate culture is underpinned by two key pillars:

Compliance with regulations that apply to the activities of the entire Atresmedia Group, its subsidiaries, directors, executives, and employees.

Compliance with the corporate **"We believe in the power of reflection and emotion"**, purpose, mission, and values, and the voluntary commitments to create a society of shared values as described below.

PURPOSE	**“We believe in the power of reflection and emotion”.**
MISSION	Broadcast of varied, innovative and high quality news and entertainment offerings that respond to our stakeholders' needs in order to win their trust and thereby ensure the leadership position and sustainability of the Group.
VISION	To be the reference independent multimedia communication group with a valuable and positive contribution to the society in which we operate.
VALUES	**Commitment:** We strive to make a valuable contribution to society by creating social awareness campaigns to help overcome problems and generate positive change. **Quality:** We work on the ongoing improvement of our activities, developing excellent products with regard to their form and content, aimed at the needs and expectations of the spectator. **Creativity:** We encourage our employees to be creative and allow them artistic freedom and freedom of thought while respecting the democratic and cultural values of society. **Long-term vision:** We work to make our company a leader within the audiovisual sector by embracing and creating the future. **Innovation:** We promote the creation of new ideas, products, services that contribute value to the Company and society. **Diversity:** We strive to provide a working environment that respects and promotes equality, diversity and inclusion, so that all our employees and partners can work in an environment that is safe, free and non-judgemental, ensuring an appropriate work-life balance. We also endeavour to ensure our content lends visibility to and reflects the diversity that defines the Company. **Leadership:** We motivate and guide our collaborators to encourage their development and that of the organization, transmitting energy and inspiring confidence to help the organization to achieve its business objectives. **Individual and collective responsibility:** We perform our duties with rigour and responsibility, complying with applicable laws and the principles and rules set out in the Code of Conduct, helping in good faith to identify and address possible weaknesses or deficiencies at Atresmedia. **Teamwork:** We encourage a culture based on the establishment of relationships of trust and mutual respect between employees and the Company. We develop their autonomy and participation in decision-making, based on the principles of delegation and responsibility.

To reinforce awareness about its corporate culture and ensure that all employees in the organisation understand the guidelines of conduct and social, environmental, and governance commitments, Atresmedia maintains constant communication with its key stakeholders, particularly its administrative, management, and supervisory bodies, and its employees.

Mechanisms in place to achieve this objective include:

- Regular communications from the Compliance Officer, the Privacy Officer, or the Corporate General Manager.
- Annual questionnaires on conflicts of interest sent to executives and middle managers (approximately 300 across the Group).
- Training on the Compliance and Crime Prevention Model.
- Continuous availability and accessibility of internal rules and regulations, Compliance Model, and other corporate policies aimed at generating a model of ethical and responsible conduct.
- The Group's Whistleblowing channel.
- Various corporate communication channels and mailboxes available to all employees, e.g., the suggestion box, newsletters, and the corporate intranet.

Members of Atresmedia's administrative, management and supervisory bodies promote the Group's corporate culture through approval and enforcement of rules and regulations, acting both collegially and individually in discharging their duties.

In 2024, the corporate culture became more prominent in the administrative, management and supervisory bodies' agendas. The Compliance Officer attended three Audit and Control Committee meetings to discuss the activity of the Regulatory Compliance Committee (RCC) and the Privacy Committee. The chairs of these committees submitted their respective activity reports to the Board of Directors. Additionally, the RCC routinely addresses issues of cybersecurity and data protection, with regular attendance by the Data Protection Officer and the Group's Chief Information Security Officer. In 2024, the Corporate General Manager briefed the Audit and Control Committee on advances and challenges in sustainability for 2024-2025.

Sustainable investment

As part of reporting to stakeholders on its social, environmental, and governance (ESG) performance and commitments, and in an exercise of transparency, Atresmedia fills out the sustainability questionnaires designed by different rating agencies. These questionnaires serve as a self-evaluation tool, as well as a tool for communicating the corporate culture.

The Group's scores from these questionnaires have steadily improved over the past few years, which is a testament to the success of its ESG efforts.

Meanwhile, Atresmedia identified growing interest among shareholders and the investment community in ESG issues, recognising sustainable finance as an opportunity to access investment. As an example of this trend, in 2021 Atresmedia negotiated the refinancing and conversion of its EUR 250 million syndicated corporate loan into a sustainable finance scheme. This agreement provides the Group with more favourable financing terms and conditions linked to the achievement of three ESG indicators: the allocation of free advertising space to non-profit organisations, the accessibility of TV content through subtitling and closed captioning, and a higher score in the Climate Change Report of the Carbon Disclosure Project's (CDP). In addition, the financing deal is aligned with the Sustainability Linked Loan Principles published in 2019.

Lastly, in compliance with the EU Taxonomy Regulation, each year Atresmedia reports the proportion of its revenue, CapEx and OpEx aligned with the activities and criteria defined in the Taxonomy as sustainable finance.

Mechanisms for identifying, reporting and investigation unlawful behaviour and for the protection of whistleblowers_

Atresmedia has a number of mechanisms in place to detect, report, and investigate potential incidents of breaches of its internal rules and regulations, including the Whistleblowing Channel. As noted above, this is a confidential and priority channel for reporting violations of the Compliance Model; e.g., criminal offences, financial or accounting irregularities, discrimination, harassment, human rights violations, as well as legal breaches that could affect the Group's general interest and reputation. Accessible to third parties via the corporate website and internally through the corporate intranet, this channel allows queries or reports of breaches to be submitted anonymously, and requests, where they deem appropriate, for personal interviews with the Compliance Officer.

Additionally, Atresmedia may receive reports of unlawful conduct related to Group companies or employees through other means, e.g., the corporate responsibility mailbox or the accounts of the Group's Compliance Officer, Sustainability Officer, or other executives.

When a report of a beach is received, it is analysed to determine if it qualifies for admission and processing or whether it should be dismissed. Where a report is admitted for processing, both the whistleblower and the accused receive notification, always respecting the accused person's right to the presumption of innocence, honour, defence, access to the case file, and to be heard.

All reports are handled with strict confidentiality and in accordance with applicable regulations, ensuring protection of the whistleblower, safeguarding their identity (except for legal exceptions), and guaranteeing confidentiality of the facts and their source. The Group ensures that no retaliation is taken against whistleblowers and respects their right to be informed of the procedure until the case is resolved or closed, as provided for in the Whistleblowing Channel procedure. Corruption-related queries and reports must also be handled by the Whistleblowing Channel in accordance with Atresmedia's Anti-Corruption Protocol, which was approved by the Board of Directors and applies to the entire Group.

The Compliance Office is responsible for handling queries and has the required independence, training, and professional and managerial competencies to manage this channel.

Training on business conduct_

To ensure the entire Group understands and adheres to its guidelines of conduct and internal rules and regulations, the Regulatory Compliance Committee approved a mandatory training plan (2022-2023) for all employees, including executives and middle managers. Subjects covered include the Compliance Model and the Code of Conduct, along with information about the Whistleblowing Channel as a priority and confidential channel for reporting breaches of the model or code. This mandatory training has been part of Atresmedia's onboarding programme since 2024 to ensure that new recruits are familiar with the Compliance Model and how they are expected to behave. Meanwhile, since 2021, executives and middle managers provide an annual statement confirming their knowledge of the model and the absence of conflicts of interest.

Lastly, the Compliance Officer sends an annual communication to all employees reminding them about their obligation to comply with the Group's internal rules and regulations and informing them about the most important updates. All Group employees also receive specific notifications when issues of particular interest arise.

Functions at risk of corruption and bribery_

En el Grupo, los cargos con mayor exposición a riesgos de corrupción y soborno son aquellos que ostentan responsabilidades directivas, dada su capacidad de toma de decisiones. Esto abarca al Consejero Delegado, a los Directores Generales Corporativos o de Negocio, al Subdirector de Compras y a los Directores de las emisoras de radio (UNIPREX).

G1-2 Management of relationships with suppliers_

Atresmedia is guided by principles of fairness, transparency, objectivity, and independence in its relationships with suppliers. Given its activity, the Group differentiates between two types of suppliers, with which it interacts differently and based on their specific needs. However, it requires all of them act in accordance with the principles outlined in its Code of Conduct and with applicable legislation. These are:

SUPPLIERS OF GOODS AND SERVICES

SUPPLIERS OF CONTENT

The Group engages with suppliers of goods and services, while it also has relationships with content providers, including producers and distributors.

<u>Suppliers of goods and services</u>

Atresmedia Group has a digital supplier approval procedure that gives it control over the suppliers of goods and services with which it has relationships. Depending on their type, suppliers are required to provide certain documentation (e.g., tax, data protection, occupational health and safety) before the Group enters into any agreement to ensure that they operate within the legal framework and in line with Atresmedia's principles of business conduct.

Through this procedure, suppliers also sign a statement regarding Atresmedia Group's Compliance and Privacy Model, in which they commit to adopting the necessary measures to align both their actions and those of their people with the Group's principles and values. Specifically, they commit to zero tolerance of unlawful conduct or situations that are contrary to Atresmedia's Model and, where any are uncovered, to report them directly to the Group through the Whistleblowing Channel. They also pledge to promote equal opportunities and respect the principle of non-discrimination, and to comply with European and national regulations on personal data protection and guarantee of digital rights.

The Procurement Department oversees the process of negotiating with suppliers of goods and services, agreeing upon payment terms and service engagements which, barring specific cases, comply with the organisation's standards.

Meanwhile, the area receiving the goods or services is responsible for verifying that the relationship is carried out as agreed and for reporting any significant incidents to the Procurement Department where its involvement is required.

Moreover, to ensure transparent, ethical, and competitive procurement processes, Atresmedia Group has a Procurement Committee, which meets weekly to evaluate and approve transactions considered especially significant due to their amount and/or impact on the business.

Suppliers of content: producers and distributors

Content producers and distributors are an essential part of Atresmedia's business. Contracts signed with content producers fall within the remit of the Production Department, which manages the contract award and the relationship. To ensure they understand and respect Atresmedia Group's values, contracts include a commitment clause whereby they state that, among other principles, they foster equality among their workers and uphold human and labour rights, without

tolerating any kind of discrimination on the grounds of gender, race, sexual orientation, religious belief, political opinion, nationality, social origin, disability or any other circumstance that could be a source of discrimination. Producers are also asked to confirm that they scrupulously manage the environmental impact of their activity.

Contracts with distributors are managed by the External Production Department, which ensures transparency throughout the contracting process through its internal approval processes, while also safeguarding intellectual property rights. Along these lines, Atresmedia Group's external production content is curated based on the programming needs of the Group's channels, ensuring through the procurement process the assignment of the intellectual property exploitation rights needed for the commercial exploitation of the audiovisual content.

Procurement processes involving foreign companies are carried out within those territories covered by the Financial Action Task Force (FATF). This ensures the absence of dealings with companies resident in tax havens or any ties with money laundering, the financing of terrorist activities or any other type of unlawful activity, thereby minimising potential adverse impacts.

Payment period

In its relationships with suppliers, Atresmedia Group abides by Law 3/2004, of 29 December 2024, establishing measures to combat late payment in commercial transactions, and the transitional provisions set out in Law 15/2010, under which the maximum supplier payment period is 60 days.

Atresmedia Group acknowledges that it may have to tailor its relationships with suppliers and payment management to their specific needs. In relationships with content suppliers, payment periods are generally longer—if agreed upon by both parties and depending on the individual characteristics of the service—due to production and delivery schedules. There is no documented procedure for reducing the statutory deadline for payment with SMEs, although Atresmedia tries, where possible, to speed up payment for these suppliers.

G1-3 Prevention and detection of corruption and bribery_

Committed to strengthening and enhancing the transparency of its corporate governance, Atresmedia Group undertakes—as one of its management objectives—to adopt and implement measures and controls that effectively prevent criminal conduct in the organisation, and to ensure the legality of actions taken by employees, collaborators, and executives, in performing their professional activities. To this end, it has a Compliance and Crime Prevention Model, which helps to prevent, detect and address cases of corruption or bribery. Key elements of this model are the Anti-Corruption Protocol and the Code of Conduct.

Procedure for detecting incidents of corruption and bribery_

Any incidents of corruption or bribery detected are addressed within the framework of the Group's Compliance and Crime Prevention Model, following the procedures outlined in the Protocol for handling breaches of the Model, the Protocol for handling situations involving criminal risk or the Procedure for handling reports of breaches, as appropriate.

At Atresmedia Group, the Compliance Officer is responsible for overseeing the Internal Reporting System and managing the Whistleblowing Channel, as well as for appointing the team of investigators for potential irregularities in accordance with the Procedure for handling reports of breaches. Depending on the relevance of the incident reported, when sufficient evidence is found the Compliance Officer appoints individuals to investigate the potential unlawful conduct or irregularities, ensuring they are not personally involved in the matter.

If the whistleblower believes the Compliance Officer has a conflict of interest, an alternative recipient may be chosen to handle the report independently, assume the responsibilities of the Channel Manager in that case.

In addition, the Channel Manager has the authority to act independently in managing and investigating reports received, reporting exclusively to the Regulatory Compliance Committee (RCC) and the Audit and Control Committee on reports admitted for processing, overseeing their resolution and the corrective measures applied, and always ensuring confidentiality and the rights of those involved.

Communication and stakeholder training on corruption and bribery_

Atresmedia makes sure to communicate its compliance policies to the relevant individuals, guaranteeing that the policies are accessible and that the individuals understand the implications, through publication on the A3Mil intranet and the Atresmedia Corporación corporate website. There are also three recurring communications—sent annually via email to all affected parties—on the Compliance and Crime Prevention Model, Data Protection, and the Protocol on the acceptance and giving of gifts. This also helps raise awareness within the organisation of these issues and policies.

To ensure understanding of the rules, all executives and middle managers at Atresmedia must provide of statement regarding their knowledge and acceptance. As noted previously, employees receive mandatory training on the Compliance Model, which includes specific topics on fraud prevention and detection and conflicts of interest, and other related issues. They must state that they understand the model to complete the training. Specifically, the course covers: the main actions by the Group that could lead to criminal liability or non-compliance with the Model, the supervisory and control bodies, and the prevention and control measures in place.

All functions identified deemed to be at risk of corruption and bribery—namely, the CEO, Corporate General Managers, the Deputy General Manager of Procurement, and the Directors of Radio Stations (UNIPREX), as well as other executive directors and employees—have been included in the Compliance and Crime Prevention Model training plan, which explicitly addresses corruption and bribery.

Additionally, in a bid to promote good practices throughout its value chain, Atresmedia Group requires its suppliers to sign a procurement statement and conditions, stating that they understand and accept the Code of Conduct, the Anti-Corruption Protocol, and the Protocol on the acceptance and giving of gifts, and committing to adopt the necessary measures to ensure that their behaviour and that of their representatives align with the principles and values outlined in these documents, including anti-corruption and bribery.

In 2024, all parties investigated, including Atresmedia, were definitively cleared in Criminal Proceedings No. 53/2016 before the Central Examining Court 2 of Madrid (i.e., the SGAE/La Rueda case).

METRICS AND TARGETS

G1-5 Political influence and lobbying activities_

Atresmedia Group maintains its editorial stance and defends its interests either directly or through membership of various associations, platforms, and self-regulation and co-regulation groups at regional, national, and European levels. These associations address issues related to developments in regulations and public policies in sectors where Atresmedia operates: audiovisual media, audiovisual production, media, intellectual property, and advertising. Atresmedia knows that it needs to maintain an ethical stance in its activities, balancing the defence of freedom of expression and the free development of its communication activities and the guarantee of citizens' rights.

In defending its editorial stance and business interests, the Group is an active member in groups involved in amendments to and consultations on European regulations that affect the audiovisual industry. This way, it can ensure that regulators take its concerns, expertise, and opinions into account. Likewise, through its involvement in these processes, Atresmedia can take actions to minimise the risks associated with potential non-compliance with sector-specific regulations.

Regulatory Affairs and Institutional Relations manage lobbying and institutional relations activities, reporting to executive directors and executives on any material issues in this regard. The Group's primary representatives in these activities are the Chairman of the Board of Directors, the Executive Vice Chairman, and the CEO[53].

Atresmedia Group's lobbying activities_

Associations and platforms in which Atresmedia actively participates to defend its interests as a media company include: the Spanish Union of Commercial Open Television Broadcasters (UTECA); Spain's Open Television Platform; AUTOCONTROL for Advertising; the Catalan Radio Association (ACR); the Spanish Commercial Radio Association (AERC); IAB Spain; the Monitoring Committee of the Code of Conduct for Commercial Communications related to Gambling; the Code of Conduct for the Classification of Audiovisual Programmes and Visual Description Systems; the Association of Commercial Television and Video on Demand Services in Europe (ACT); and EGTA.

Through its lobbying activities, Atresmedia advocates for the application of the same rules for all operators competing in the same market. It wants to avoid and correct discriminatory regulatory asymmetries, while ensuring clear rules that allow for market development, provide legal certainty, protect citizens—particularly minors—and uphold constitutional principles.

In February 2024, Atresmedia joined the Media, Governance, and Informational Transparency Observatory, created by Ethosfera and Fundación HAZ, which seeks to promote and strengthen a culture of governance and transparency in media in Spain and Latin America. The Observatory created a system of indicators to assess media companies' transparency, covering issues related to ownership and independence, governance, institutional advertising, economic ties with advertisers, and the creation and dissemination of editorial content. As an active member of the Observatory, Atresmedia Group contributed its industry expertise in the creation and approval of these indicators.

Lastly, worth noting is that Atresmedia Corporación de Medios de Comunicación S.A. has been registered the EU Transparency Register since 2023[54]. And in 2024, it did not make any economic or in-kind contributions to political parties.

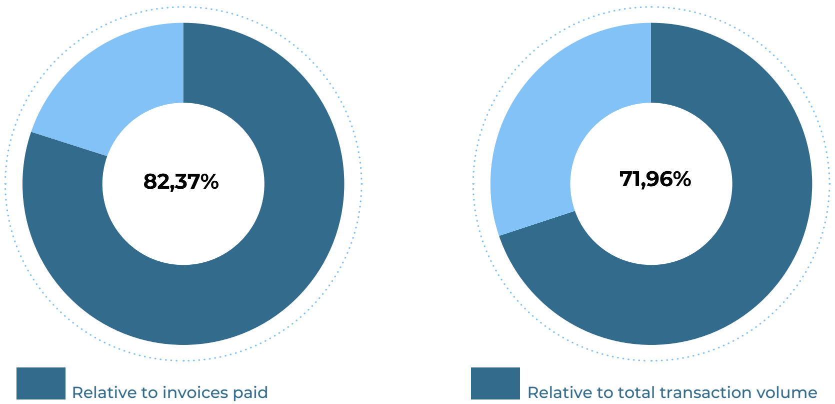
[53] *No current member of Atresmedia Group's administrative, management and supervisory bodies has held a comparable position in the current public administration in the two year preceding their appointment.*
[54] *Atresmedia Corporación de Medios de Comunicación SA is registered in the EU Transparency Register with REG number: 680073051473-25.*

G1-6 Procurement practices_

Atresmedia maintains fluid communication with suppliers regarding its supplier payment practices, thereby guaranteeing the correct management and timely payment of invoices.[55].

In 2024, the average supplier payment period—understood at the time elapsed between the delivery of the goods or the rendering of the services by the supplier and the actual payment of the transaction—was 40 days. Set out below is the monetary volume and number of invoices paid before the statutory deadline.

% OF PAYMENTS ALIGNED WITH STANDARD TERMS



As at year-end 2024, no legal proceedings were recorded for late payments to suppliers.

[55] Atresmedia differentiates between suppliers of content and suppliers of goods and services at business level, while the Group does not make these distinctions in its accounting.

Annex I Content of Law 11/2018_

ANNEX I CONTENT OF LAW 11/2018

Information on social and employee matters

1

Distribution of employees by employee category

	2023		2024			Annual change 2023- 2024 (%)	
	Men	Women	Men	Women	Total	Men	Women
Senior Management	10	2	11	3	14	10%	50%
Executives	154	86	152	91	243	-1%	5.81%
Technicians	878	930	940	993	1,933	7%	7%
Administrative staff	19	123	21	119	140	11%	-3%
Other	136	224	142	194	336	4%	-13%
Total	**1,197**	**1,365**	**1,266**	**1,400**	**2,666**	**6%**	**3%**

Average annual number of permanent, temporary and part-time contracts by gender, age and employee category

Average annual number of permanent, temporary and part-time contracts by gender

	By gender	2023	2024	Annual change 2023- 2024 (%)
Permanent contract	Men	1,100	1,154	4.9%
	Women	1,211	1,245	2.8%
Temporary contract	Men	75	78	4.0%
	Women	108	112	3.7%
Part-time contract	Men	13	16	23.1%
	Women	21	22	4.8%

Average annual number of permanent, temporary and part-time contracts by age

	By age	2023	2024	Annual change 2023- 2024 (%)
Permanent contract	Under 30	284	304	7.0%
	30- 50	1,329	1,327	-0.2%
	Over 50	698	768	10.0%
Temporary contract	Under 30	122	135	10.7%
	30- 50	50	44	-12.0%
	Over 50	10	11	10.0%
Part-time contract	Under 30	6	10	66.7%
	30- 50	22	20	-9.1%
	Over 50	6	8	33.3%

Average annual number of permanent, temporary and part-time contracts by employee category

	By category	2023	2024	Annual change 2023- 2024 (%)
Permanent contract	Executives	253	256	1%
	Technicians	1,683	1,764	5%
	Administrative staff	131	135	3%
	Other	243	243	0%
Temporary contract	Executives	0	0	N/A
	Technicians	84	115	37%
	Administrative staff	11	4	-64%
	Other	88	71	-19%
Part-time contract	Executives	1	1	0%
	Technicians	19	22	16%
	Administrative staff	10	12	20%
	Other	3	4	33%

Average remuneration for categories of workers who perform the same work or work of equal value and trend by gender, age and employee category

Average remuneration by employee category, age and gender

Average remuneration		2023	2024			Annual change 2023- 2024 (%)
			Total	Men	Women	
By category	Executives	151,001	**155,548**	173,435	124,530	3.0%
	Technicians	43,850	**45,250**	47,159	43,444	3.2%
	Administrative staff	34,151	**34,966**	35,105	34,942	2.4%
	Other	30,126	**33,075**	32,600	33,423	9.8%
By age	Under 30	25,665	**27,156**	27,612	26,873	5.8%
	30-50	47,963	**48,611**	50,917	46,559	1.4%
	Over 50	75,480	**79,387**	92,718	63,804	5.2%
By gender	Men	60,360	**61,584**	N/A		2.0%
	Women	44,533	**46,777**			5.0%

Average remuneration of directors and executives, including variable remuneration, per diem allowances, severance pay, long-term retirement plans and any other amounts received, broken down by gender

Average remuneration of senior management by gender

Average remuneration Senior Management	2023	2024	Annual change 2023- 2024 (%)
Men	501,465	552,290	10.1%
Women	365,082	348,385	-4.75%
Average	478,735	508,596	6.23%

Average remuneration of non-executive directors by gender

Average remuneration Non-executive directors	2023	2024	Annual change 2023- 2024 (%)
Men	215,955	228,763	5.93%
Women	83,583	93,125	11.42%
Average	157,123	168,478	7.23%

Average remuneration of executive directors by gender

Average remuneration Executive directors	2023	2024	Annual change 2023- 2024 (%)
Men	1,414,474	1,406,814	-0.54%
Mujer	-		N/A
Average	1,414,474	1,406,814	-0.54%

Work-related injuries, in particular their frequency and severity, and work-related ill health, broken down by gender

Absentee rate due to non-work-related ill health, accident frequency rate, and accident severity rate by gender

		2023	2024	Annual change 2023- 2024 (%)
Absentee rate due to non-worked- related ill health (voluntary)	**Total**	**3.45**	**4.8**	**39%**
	Women	4.05	5.91	46%
	Men	2.77	3.73	35%
Accident frequency rate	**Total**	**0.67**	**0.86**	**28%**
	Women	0.42	0.41	-2%
	Men	0.96	1.36	42%
Serious accident frequency rate	**Total**	**0.06**	**0.12**	**100%**
	Women	0.00	0.00	0%
	Men	0.13	0.25	92%

No. of lost-time accidents, absentee rate, hours lost and work-related ill heath by gender.

Notably, as was the case the year before, no incidents of work-related ill health were recorded in 2024.

		2023	2024	Variación anual 2023- 2024 (%)
Nº of lost-time accidents (excluding communting)	**Total**	**3**	**4**	**33%**
	Women	1	1	0%
	Men	2	3	50%
Employee absentee rate (voluntary)	**Total**	**3,6**	**5,07**	**41%**
	Women	4.07	6.03	51%
	Men	3.07	3.73	24%
Absentee hours	**Total**	**160,824**	**236,032**	**47%**
	Women	96,664	147,296	52%
	Men	64,160	88,736	38%

Number and breakdown of dismissals by gender, age, and employee category

Total number of dismissals by gender

Nº of dismissals by gender	2023	2024	Annual change 2023- 2024 (%)
Men	17	18	6%
Woman	15	25	67%
Total	**32**	**43**	**34%**

Total number of dismissals by age

Nº of dismissals by age	2023	2024	Annual change 2023- 2024 (%)
Under 30	2	9	350%
30-50	18	23	28%
Over 50	11	11	0%
Total	**31**	**43**	**39%**

Total number of dismissals by employee category

Nº of dismissals by employee category	2023	2024	Annual change 2023- 2024 (%)
Executives	3	1	-67%
Technicians	25	34	36%
Administrative staff	3	4	33%
Other	1	4	300%
Total	**32**	**43**	**34%**

Total hours of training by employee category

Total no. of training hours per employee category

Total Nº of training hours	2023	2024	Annual change 2023- 2024 (%)
Managers	6,968	4,299	-38%
Technicians	31,869	21,255	-33%
Administrative staff	2,364	1,786	-24%
Other	4,656	3,915	-16%
Total	**45,857**	**31,253**	**-32%**

Disclosures on anti-corruption and bribery 2

Contributions to foundations and non-profit organisations

Contributions and endowments by Atresmedia (EUR)

Contributions (EUR)	2023[56]	2024	Annual change 2023- 2024 (%)
Endowment by Atresmedia to Fundación Atresmedia (EUR thousand)	521	500	-4.03%
Other types of contributions (EUR thousand)	287	331	14.33%

Financial performance 3

Tax information

Profit before tax

	2023	2024	Annual change 2023- 2024 (%)
Profit before tax	147,663,285	160,329,038	8.9%

Tax indicators (EUR thousand)

	2023	2024	Annual change 2023- 2024 (%)
Income tax expense[57]	6,814	11,204	64.42%
Subvenciones recibidas	168	474	182%
Canon RTVE	19,417	22,569	16%
Deducciones aplicadas	12,341	3,690	-70%

[56] *The 2023 figure has been restated because an error was detected in the figure provided in 2023.*
[57] *The figure for 2023 was restated in accordance with the criteria applied in 2024.*

Environmental information 4

Carbon footprint

GHG emikssions (t CO_2 eq)

GHG emissions (tCO₂eq)	2023	2024	Annual change 2023- 2024 (%)
Scope 1 emissions	1,692.0	1,696.9	0.29%
Market-based Scope 2 GHG emissions	517.2	471.7	-8.8%
Total Scope 1 and 2 emissions*	**2,209.2**	**2,168.6**	**-1.84%**
Total Scope 3 emissions	**168,636.95**	**179,754.31**	**6.59%**
1. Purchased goods and services	88,470.38	92,246.86	4.27%
2. Capital goods	3,450.63	6,107.35	76.99%
3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)	338.82	342.72	1.15%
4. Upstream transportation and distribution	1,960.98	2,023.11	3.17%
5. Waste generated in operations	138.81	221.89	59.85%
6. Business travel	2,368.51	2,877.20	21.5%
7. Employee commuting	5,326.31	4,065.83	23.67%
8. Upstream leased assets	2,527.00	2,853.78	12.93%
11. Use of sold products	20,354.51	19,330.16	-5%
15. Investments	43,700.99	49,685.40	13.7%

** Data for Scope 1 and 2 carbon emissions were recalculated with the 2023 conversion factors. Scope 1 and Scope 2 carbon footprint data were calculated using the most recently published emission factors as of the reporting date (2023) and will be restated when the 2024 factors are published.*

Information related to society 5

Complaints received and their resolution (consumers)

Atresplayer (incidents handled)

Type of incidents handled, %	2023	2024	Annual change 2023- 2024 (%)
Total number of inquiries handled			
Information, suggestions	19%	18%	-5%
Complaints	7%	6%	-14%
Technical incidents	11%	9%	-18%
Payment incidents	8%	3%	-63%
Direct incidents	2%	1%	-50%
Cancellation of subscription	12%	14%	17%
Technical, payment and access assistance	35%	41%	17%
Discount code	2%	3%	50%
Other and not applicable	6%	5%	-17%

Whistleblowing channel

	2023	2024	Annual change 2023- 2024 (%)
Inquiries	1	0	-100%
Reports of breaches	22	9	-59%

Email

	2023	2024	Annual change 2023- 2024 (%)
Communications	80	128	60%
Queries regarding CSR	62.5%	41%	-34%
Queries regarding HR	13%	20%	54%
Requests for information	11%	17%	55%
Complaints about content	10%	12%	20%
Impacts	2.5%	9%	260%
Suggestions	1%	1%	0%

Association and sponsorship actions

Atresmedia Group has partnership and sponsorship relationships with a range of organisations with the aim of maximising its positive impact on society. For more information on association actions, see S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions in ESRS S4 Consumers and end-users, specifically the following:

- Corporate social responsibility initiatives: Ponle Freno, Constantes y Vitales, Levanta la Cabeza, Tolerancia Cero, Crea Cultura, Hablando en Plata and Luz Verde.
- Broadcasting of social and environment content: mouthpiece for social causes and the climate.

Supervision and audit systems and their findings_

Atresmedia has several measures and a supplier approval procedure to, among other aspects, manage its relations with its suppliers. For more information, see section S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions of ESRS S2 Workers in the value chain and section G1-2 Management of relationships with suppliers of ESRS G1 Business conduct.

Annex II Content Index of Law 11/2018 and ESRS

ANNEX II CONTENT INDEX OF LAW 11/2018 AND ESRS

TOPIC	Content	Related reporting framework	Section with the disclosure	Page
Business model	Brief description of the Group's business model, including: 1.) its business environment 2) its organisation and structure 3) the markets where it operates 4) its objectives and strategies 5) the main trends and factors that may affect its future development	ESRS 2 ESRS E1-2 E1- 4 ESRS S1-1 S1-5 ESRS S2-1 S2- 5 ESRS S4-1 S4- 5 ESRS G1-1	ESRS 2 General information ESRS E1 Climate change ESRS S1 Own workforce ESRS S2 Workers in the value chain ESRS S4 Consumers and end-users ESRS G1 Business conduct	5-55 79-80; 88-90 99-102; 112-113 120-121; 125 132-135; 155-156 161-168
Policies	A description of the policies pursued by the Group in relation to those matters, including: 1.) the due diligence procedures undertaken to identify, measure, prevent and mitigate significant risks and impacts 2.) assurance and control procedures, including the actions taken.	ESRS 2 ESRS E1-2 ESRS S1-1 ESRS S2-1 ESRS S4-1 ESRS G1-1	ESRS 2 General information ESRS E1 Climate change ESRS S1 Own workforce ESRS S2 Workers in the value chain ESRS S4 Consumers and end-users ESRS G1 Business conduct	5-55 79-80 99-102 120-121 132-135 161-168
Policy results – KPIs	The results of these policies, including relevant non-financial key performance indicators that enable: 1) monitoring and assessment of progress and 2) comparability across companies and sectors, in accordance with the national, European or international reference frameworks used for each topic	ESRS 2 ESRS E1-2 ESRS S1-1 ESRS S2-1 ESRS S4-1 ESRS G1-1	ESRS 2 General information ESRS E1 Climate change ESRS S1 Own workforce ESRS S2 Workers in the value chain ESRS S4 Consumers and end-users ESRS G1 Business conduct	5-55 79-80 99-102 120-121 132-135 161-168
Short-, medium- and long-term risks	The principal risks related to those matters linked to the group's operations including, where relevant and proportionate, its business relationships, products or services which are likely to cause adverse impacts in those areas, and * how the Group manages those risks * explaining the processes undertaken to detect and assess them in accordance with national, EU-based on international frameworks for each * Should include information and disclosures on the impacts detected, especially regarding short-, medium- and long-term risks	ESRS 2 GOV 5 ESRS 2 SBM-3 ESRS 2 IRO-1	ESRS 2 General information	18 30-34 35-41

TOPIC	Content	Related reporting framework	Section with the disclosure	Page
KPIs	Non-financial key performance indicators (KPIs) relevant to the particular business and that meet comparability, materiality, relevance and reliability criteria. * To facilitate comparison of information, both over time and among undertakings, non-financial KPIs that may be applied generally and that comply with European Commission guidelines and Global Reporting Initiative standards shall be taken. The Group must specify in the report the national, EU-based or international framework used for each matter. * Non-financial KPIs should be applied to each section of the statement of non-financial information. * These indicators should be useful, taking into account the Group's specific circumstances and coherent with the parameters used in the Group's internal risk management and assessment procedures. * In any case, the information presented must be accurate, comparable and verifiable.	-	Disclosed throughout the Statement	Disclosed throughout the Statement
Environmental matters	**Overall environment**			
	1.) Detailed information on the current and foreseeable impacts of the company's operations on the environment including, where appropriate, on health and safety, environmental assessment or certification processes 2.) Resources allocated to preventing environmental risks 3.) Application of the precautionary principle or approach, amount of provisions and guarantees for environmental risks. (e.g. arising from the environmental responsibility law)	ESRS 2 GOV 5 ESRS 2 IRO-1 ESRS 2 SBM-3 ESRS E1-1 ESRS E1-2 ESRS E1-3	ESRS 2 General information ESRS E1 Climate change	18 35-41 30-34 72-75 79-80 81-87

TOPIC	Content	Related reporting framework	Section with the disclosure	Page
Environmental matters	**Pollution**			
	Measures to prevent, reduce or repair carbon emissions that **seriously** affect the environment	ESRS E2-2	Not material	-
	Measures to prevent, reduce or remedy other forms of activity-specific air pollution, including noise and light pollution	ESRS E2-2	Not material	-
	Circular economy and waste prevention and management			
	Circular economy	ESRS E5-2	Not material	-
	Waste: Waste prevention, recycling and reuse measures, and other forms of waste recovery and removal	ESRS E5-2	Not material	-
	Actions to combat food waste	GRI 3-3	Not material	-
	Sustainable use of resources			
	Water consumption and water supply in accordance with local limits	ESRS E3-4	Not material	-
	Consumption of raw materials and measures taken to make more efficient use of them	ESRS E5-4	Not material	-
	Direct and indirect consumption of energy, measures taken to improve energy efficiency and use of renewable energies	ESRS E1-3 ESRS E1-5	ESRS E1 Climate change	81-87 90
	Climate change			
	Key aspects of the greenhouse gas emission caused by the Company's activities, including the use of the goods and services it produces	ESRS E1-4 ESRS E1-6	ESRS E1 Climate change	88-90 91-92

TOPIC	Content	Related reporting framework	Section with the disclosure	Page
Environmental matters	**Climate change**			
	Measures taken to adapt to the consequences of climate change	ESRS E1-4 ESRS E1-6	ESRS E1 Climate change	81-87
	The voluntary medium- and long-term greenhouse gas emission-reduction targets and the measures implemented to achieve them	ESRS E1-4	ESRS E1 Climate change	88-90
	Protection of biodiversity			
	Measures taken to preserve or restore biodiversity	ESRS E4-3	Not material	-
	Impacts caused by activities or operations in protected areas	ESRS 2 - SBM-3	Not material	-
Social and employee-related matters	**Employment**			
	Total number and breakdown of employees by gender, age, country and employee category	ESRS S1-6	ESRS S1 Own workforce	113
	Total number and breakdown of types of employment contracts	ESRS S1-6	ESRS S1 Own workforce	113
	Average annual number of permanent, temporary and part-time contracts by gender, age and employee category	ESRS S1-6	ESRS S1 Own workforce	113
	Number and breakdown of dismissals by gender, age, and employee category	ESRS S1-6	ESRS S1 Own workforce	113
	Average remuneration and trends by gender, age and employee category or equivalent amount; gender pay gap, remuneration for equal positions or average remuneration within the company	ESRS S1-16	ESRS S1 Own workforce	116
	Average remuneration of directors and managers, including variable remuneration, per diem allowances, severance pay, long-term retirement plans and any other amounts received, broken down by gender	ESRS S1-16	ESRS S1 Own workforce	116
	Implementation of right to disconnect policies	ESRS S1-1	ESRS S1 Own workforce	99-102
	Employees with disabilities	ESRS S1-12	ESRS S1 Own workforce	115

TOPIC	Content	Related reporting framework	Section with the disclosure	Page
Social and employee-related matters	**Organisation of work**			
	Organisation of working hours	ESRS S1-1	ESRS S1 Own workforce	99-102
	Number of hours of absenteeism	GRI 403-9	Annex I Content of Law 11/2018	174-183
	Measures aimed a facilitating work- like balance and encouraging the equal enjoyment by both parents	ESRS S1-15	ESRS S1 Own workforce	115
	Health and safety			
	Health and safety conditions in the workplace	ESRS S1-11	ESRS S1 Own workforce	114
	Work-related injuries, in particular their frequency and severity, and work-related ill health, broken down by gender	ESRS S1-14	ESRS S1 Own workforce	115
	Social relations			
	Organisation of social dialogue, including procedures for informing and consulting with staff and negotiating with them	ESRS S1-2	ESRS S1 Own workforce	102-104
	Percentage of employees covered by a collective bargaining agreement, by country	ESRS S1-8	ESRS S1 Own workforce	114
	Status of collective bargaining agreements, particularly in relation to occupational health and safety	ESRS S1-1	ESRS S1 Own workforce	99-102
	Mechanisms and procedures that the company has in place to promote the engagement of workers in the management of the company, in terms of information, consultation and participation	ESRS S1-2	ESRS S1 Own workforce	102-104
	Training			
	Policies implemented in relation to training	ESRS S1-2	ESRS S1 Own workforce	102-104
	Total hours of training by employee category	ESRS S1-13	ESRS S1 Own workforce	115

TOPIC	Content	Related reporting framework	Section with the disclosure	Page
Social and employee-related matters	**Universal accessibility for people with disabilities**			
	Universal accessibility for people with disabilities	ESRS S1-12	ESRS S1 Own workforce	115
	Equality			
	Measures adopted to promote equal treatment and opportunities between men and women	ESRS S1-4 ESRS S1-9	ESRS S1 Own workforce	105-111 114
	Equality plans (Chapter III of Organic Law 3/2007, of 22 March, on effective equality between men and women), measures adopted to promote employment, protocols against sexual abuse and sexual harassment, integration and university accessibility for people with disabilities	ESRS S1-1 ESRS S1-4 ESRS S1-9 ESRS S1-12	ESRS S1 Own workforce	99-102 105-111 114 115
	Policy against all forms of discrimination and, where applicable, diversity management	ESRS S1-1	ESRS S1 Own workforce	99-102
Human rights	Implementation of due diligence processes in relation to human rights Prevention of risks of human rights violations and, where applicable, measures to mitigate, manage and redress any such violations	ESRS 2 GOV 4 ESRS S1-4 ESRS S2-4 ESRS S4-4	ESRS 2 General information ESRS S1 Own workforce ESRS S2 Workers in the value chain ESRS S4 Consumers and end-users	17 105-111 122-125 138-154
	Reported human rights violations	ESRS S1-17	ESRS S1 Own workforce	116
	Advocacy and compliance with the provisions of fundamental conventions of the International Labour Organization related to safeguarding the freedom of association and the right to collective bargaining	ESRS S1-1 ESRS S2-1	ESRS S1 Own workforce ESRS S2 Workers in the value chain	99-102 120-121
	The elimination of workplace discrimination and job discrimination			
	Elimination of forced or compulsory labour			
	Effective abolition of child labour			
Corruption and bribery	Measures adopted to prevent corruption and bribery	ESRS G1-3	ESRS G1 Business conduct	170-171 172-173
	Anti-money laundering measures			
	Contributions to foundations and non- profit organisations	ESRS G1-5		

TOPIC	Content	Related reporting framework	Section with the disclosure	Page
Society	**Company commitments to sustainable development**			
	The impact of the company's operations on local employment and development	ESRS 2 SBM 3	ESRS 2 General information	30-34
	The impact of the company's operations on local communities and in the area			
	The relationships with key members of local communities and the various forms of engaging them	Criteria of the Company	ESRS S4 Consumers and end-users	138-154
	Association and sponsorship activities	Criteria of the Company	Annex I Content of Law 11/2018	174-183
	Outsourcing and providers			
	Inclusion in the procurement policy of social, gender equality and environmental matters. Consideration in relationships with suppliers and subcontractors of their social and environmental responsibilities	ESRS S2-1 ESRS S2-2 ESRS S2-3 ESRS S2-4 ESRS G1-2	ESRS S2 Workers in the value chain ESRS G1 Business conduct	120-121 121 121-122 122-125 168-170
	Supervision and audit systems and their findings			
	Consumers			
	Consumer health and safety measures	ESRS S4-1 ESRS S4-4	ESRS S4 Consumers and end-users	132-135 138-154
	Whistle-blowing systems, complaints received and their resolution	ESRS S4-3 ESRS S4-5	ESRS S4 Consumers and end-users	137-138 155-156
	Tax information			
	Country-by-country earnings obtained Income taxes paid	GRI 207	Annex I Content of Law 11/2018	174-183
	Public subsidies received	GRI 207	Annex I Content of Law 11/2018	174-183
Other content	Eligibility and alignment of business activities with the European Taxonomy	Own methodology based on compliance with Regulation (EU) 2020/852 ESRS E1	EU Taxonomy	56-71

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Atresmedia Corporación de Medios de Comunicación, S.A. y sociedades dependientes

Informe de Verificación limitada emitido por un verificador sobre el Estado de Información no Financiera (EINF) Consolidado e Información sobre Sostenibilidad

31 de diciembre de 2024

KPMG

KPMG Auditores, S.L.
Paseo de la Castellana, 259C
28046 Madrid

Informe de Verificación limitada emitido por un verificador sobre el Estado de Información no Financiera Consolidado e Información sobre Sostenibilidad de Atresmedia Corporación de Medios de Comunicación, S.A. y sociedades dependientes del ejercicio 2024

A los accionistas de Atresmedia Corporación de Medios de Comunicación, S.A.

Conclusión de verificación limitada

De acuerdo con el artículo 49 del Código de Comercio hemos realizado la verificación limitada del Estado de Información No Financiera Consolidado adjunto (en adelante EINF) correspondiente al ejercicio anual finalizado el 31 de diciembre de 2024 de Atresmedia Corporación de Medios de Comunicación, S.A. (en adelante la entidad) y sociedades dependientes (en adelante el Grupo) que forma parte del informe de gestión consolidado del Grupo.

El contenido del EINF incluye información adicional a la requerida por la normativa mercantil vigente en materia de información no financiera, en concreto incluye la Información sobre Sostenibilidad preparada por el Grupo correspondiente al ejercicio anual terminado el 31 de diciembre de 2024 (en adelante, la información sobre sostenibilidad) siguiendo lo establecido en la Directiva (UE) 2022/2464 del Parlamento Europeo y del Consejo, de 14 de diciembre de 2022, sobre Información Corporativa en Materia de Sostenibilidad (CSRD, por sus siglas en inglés). Dicha información sobre sostenibilidad también ha sido objeto de verificación limitada.

Basándonos en los procedimientos realizados y en las evidencias que hemos obtenido, no ha llegado a nuestro conocimiento ninguna cuestión que nos lleve a pensar que:

a) el Estado de Información no Financiera del Grupo correspondiente al ejercicio finalizado el 31 de diciembre de 2024 no ha sido preparado, en todos sus aspectos significativos, de acuerdo con los contenidos recogidos en la normativa mercantil vigente y siguiendo los criterios seleccionados de las Normas Europeas de Información sobre Sostenibilidad (NEIS o ESRS, por sus siglas en inglés), así como aquellos otros criterios descritos de acuerdo a lo mencionado para cada materia en la tabla "Anexo II Índice Contenidos Ley 11/2018 y NEIS" del citado Estado;

b) la información sobre sostenibilidad en su conjunto no ha sido preparada, en todos los aspectos significativos, de conformidad con el marco de información sobre sostenibilidad aplicado por el Grupo y que se identifica en la nota "Base para la elaboración" adjunta, incluyendo:

- Que la descripción proporcionada del proceso para identificar la información sobre sostenibilidad incluida en la nota "1.4.1 Información sobre el proceso de evaluación

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de la importancia relativa" es coherente con el proceso implantado y que permite identificar la información material a ser revelada según las prescripciones de las NEIS.

- El cumplimiento de las NEIS.
- El cumplimiento de los requisitos de divulgación, incluidos en la subsección "2.1 Taxonomía de la Unión Europea" de la sección sobre medio ambiente de la información sobre sostenibilidad con lo establecido en el artículo 8 del Reglamento (UE) 2020/852, del Parlamento Europeo y del Consejo, de 18 de junio de 2020, relativo al establecimiento de un marco para facilitar las inversiones sostenibles.

Fundamento de la conclusión

Hemos realizado nuestro encargo de verificación limitada de conformidad con las normas profesionales de general aceptación aplicables en España y específicamente con las pautas de actuación contenidas en las Guías de Actuación 47 Revisada y 56 emitidas por el Instituto de Censores Jurados de Cuentas de España sobre encargos de verificación de información no financiera y considerando el contenido de la nota publicada por el ICAC en fecha 18 de diciembre de 2024 (en adelante, normas profesionales de general aceptación).

La extensión de los procedimientos aplicados en un encargo de verificación limitada es menor en comparación con los que se requieren en un encargo de verificación razonable. En consecuencia, el grado de seguridad que se obtiene en un encargo de verificación limitada es menor que el grado de seguridad que se hubiera obtenido si se hubiera realizado un encargo de seguridad razonable.

Nuestras responsabilidades de acuerdo con dicha normativa se describen con más detalle en la sección *Responsabilidades del verificador* de nuestro informe.

Hemos cumplido con los requerimientos de independencia y demás requerimientos de ética del Código Internacional de Ética para Profesionales de la Contabilidad (incluidas las normas internacionales de independencia) del Consejo de Normas Internacionales de Ética para Profesionales de la Contabilidad (Código de ética del IESBA por sus siglas en inglés) que está basado en los principios fundamentales de integridad, objetividad, competencia y diligencia profesionales, confidencialidad y comportamiento profesional.

Nuestra firma aplica la Norma Internacional de Gestión de la Calidad (NIGC) 1, que requiere que se diseñe, implante y opere un sistema de gestión de la calidad que incluya políticas y procedimientos relativos al cumplimiento de los requerimientos de ética, normas profesionales y requerimientos legales y reglamentarios aplicables.

Consideramos que la evidencia que hemos obtenido es suficiente y adecuada para proporcionar una base sobre la que sustentar nuestra conclusión.

Párrafo de énfasis

Llamamos la atención respecto de lo señalado en el apartado "BP-2 Información relativa a circunstancias específicas" adjunta, en donde se menciona que el Estado de Información No Financiera Consolidado e Información sobre Sostenibilidad se presenta como un documento separado del Informe de Gestión consolidado, del cual forma parte, por ser esta una de las opciones

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contempladas en la Ley 11/2018 en materia de información no financiera. Nuestra conclusión no ha sido modificada en relación con esta cuestión.

Otras cuestiones

Con fecha 29 de febrero de 2024 otros verificadores emitieron su informe de verificación independiente del Estado de Información no Financiera Consolidado de Atresmedia Corporación de Medios de Comunicación, S.A. y sociedades dependientes del ejercicio 2023 en el que expresaron una conclusión favorable.

Responsabilidades de los administradores

La formulación del EINF incluido en el informe de gestión consolidado del Grupo, así como el contenido del mismo, es responsabilidad de los Administradores de Atresmedia Corporación de Medios de Comunicación, S.A. El EINF se ha preparado de acuerdo con los contenidos recogidos en la normativa mercantil vigente y siguiendo los criterios de las NEIS seleccionados, así como aquellos otros criterios descritos de acuerdo a lo mencionado para cada materia en la tabla "Anexo II índice Contenidos Ley 11/2018 y NEIS" del citado Estado.

Esta responsabilidad incluye asimismo el diseño, la implantación y el mantenimiento del control interno que se considere necesario para permitir que el EINF esté libre de incorrección material, debida a fraude o error.

Los administradores de Atresmedia Corporación de Medios de Comunicación, S.A. son también responsables de definir, implantar, adaptar y mantener los sistemas de gestión de los que se obtiene la información necesaria para la preparación del EINF.

En relación con la información sobre sostenibilidad, los administradores de la entidad son responsables de desarrollar e implantar un proceso para identificar la información que se debe incluir en la información sobre sostenibilidad de conformidad con el contenido de la CSRD, de las NEIS y con lo establecido en el artículo 8 del Reglamento (UE) 2020/852, del Parlamento Europeo y del Consejo, de 18 de junio de 2020 y de divulgar información sobre este proceso en la propia información sobre sostenibilidad en la nota "1.4.1 Información sobre el proceso de evaluación de la importancia relativa". Dicha responsabilidad incluye:

- conocer el contexto en el que se desarrollan las actividades y relaciones de negocio del Grupo, así como sus grupos de interés, en relación con los impactos que tiene el Grupo sobre las personas y el medio ambiente;
- identificar los impactos reales y potenciales (tanto negativos como positivos), así como los riesgos y oportunidades que podrían afectar, o de los que razonablemente se podría esperar que afecten, a la situación financiera, los resultados financieros, los flujos de efectivo, el acceso a la financiación o el coste de capital del Grupo en el corto, medio o largo plazo;
- evaluar la materialidad de los impactos, riesgos y oportunidades identificados;
- realizar hipótesis y estimaciones que sean razonables en función de las circunstancias.

Los administradores son asimismo responsables de la preparación de la información sobre sostenibilidad, que incluya la información identificada por el proceso, de conformidad con el marco

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de información sobre sostenibilidad aplicado, incluyendo el cumplimiento de la CSRD, el cumplimiento de las NEIS y el cumplimiento de los requisitos de divulgación, incluidos en la subsección "2.1 Taxonomía de la Unión Europea" de la sección sobre medio ambiente de la información sobre sostenibilidad con el artículo 8 del Reglamento (UE) 2020/852, del Parlamento Europeo y del Consejo, de 18 de junio de 2020, relativo al establecimiento de un marco para facilitar las inversiones sostenibles.

Esta responsabilidad incluye:

- Diseñar, implantar y mantener el control interno que los administradores consideren relevante para permitir la preparación de la información sobre sostenibilidad que esté libre de incorrecciones materiales, debidas a fraude o error.
- Seleccionar y aplicar métodos apropiados para la presentación de información sobre sostenibilidad y la realización de asunciones y estimaciones que sean razonables, considerando las circunstancias, sobre las divulgaciones específicas.

Limitaciones inherentes en la preparación de la información

De acuerdo con las NEIS, los administradores de la entidad están obligados a preparar información prospectiva sobre la base de asunciones e hipótesis, que han de incluirse en la información sobre sostenibilidad, acerca de hechos que pueden ocurrir en el futuro, así como posibles acciones futuras que, en su caso, podría tomar el Grupo. El resultado real puede diferir de forma significativa del estimado, ya que se refiere al futuro y los acontecimientos futuros frecuentemente no ocurren como se esperaba.

Para determinar las revelaciones de la información sobre sostenibilidad, los administradores de la entidad interpretan términos legales y de otro tipo que no se encuentran claramente definidos que pueden ser interpretados de forma diferente por otras personas, incluyendo la conformidad legal de dichas interpretaciones y, en consecuencia, están sujetas a incertidumbre.

Responsabilidades del verificador

Nuestros objetivos son planificar y realizar el encargo de verificación con el fin de obtener una seguridad limitada sobre si el EINF y la información sobre sostenibilidad están libres de incorrección material, ya sea debida a fraude o error, y emitir un informe de verificación limitada que contiene nuestras conclusiones al respecto. Las incorrecciones pueden deberse a fraude o error y se consideran materiales si, individualmente o de forma agregada, puede preverse razonablemente que influirán en las decisiones que los usuarios toman basándose en esta información.

Como parte de un encargo de verificación limitada, aplicamos nuestro juicio profesional y mantenemos una actitud de escepticismo profesional durante todo el encargo. También:

- Diseñamos y aplicamos procedimientos para evaluar si el proceso para identificar la información que se incluye tanto en el EINF como en la información sobre sostenibilidad es congruente con la descripción del proceso seguido por el Grupo y permite, en su caso, identificar la información material a ser revelada según las prescripciones de las NEIS.

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- Aplicamos procedimientos sobre el riesgo, incluido obtener un conocimiento de los controles internos relevantes para el encargo con el fin de identificar la información a revelar en la que es más probable que surjan incorrecciones materiales, debido a fraude o error, pero no con la finalidad de proporcionar una conclusión acerca de la eficacia del control interno del Grupo.
- Diseñamos y aplicamos procedimientos que responden a las divulgaciones contenidas tanto en el EINF como en la información sobre sostenibilidad en las que es probable que surjan incorrecciones materiales. El riesgo de no detectar una incorrección material debida a fraude es más elevado que en el caso de una incorrección material debida a error, ya que el fraude puede implicar colusión, falsificación, omisiones deliberadas, manifestaciones intencionalmente erróneas o la elusión del control interno.

Resumen del trabajo realizado

Un encargo de verificación limitada incluye la realización de procedimientos para obtener evidencia que sirva de base para nuestras conclusiones. La naturaleza, momento de realización y extensión de los procedimientos seleccionados depende del juicio profesional, incluida la identificación de la información a revelar en que es probable que surjan incorrecciones materiales, debido a fraude o error, en el EINF y en la información sobre sostenibilidad.

Nuestro trabajo ha consistido en indagaciones ante la dirección, así como a las diversas unidades y componentes del Grupo que han participado en la elaboración del EINF e información sobre sostenibilidad, en la revisión de los procesos para recopilar y validar la información presentada en el EINF e información sobre sostenibilidad y en la aplicación de ciertos procedimientos analíticos y pruebas de revisión por muestreo, que se describen a continuación:

En relación con el proceso de verificación del EINF:

- Reuniones con el personal del Grupo para conocer el modelo de negocio, las políticas y los enfoques de gestión aplicados, los principales riesgos relacionados con esas cuestiones y obtener la información necesaria para la revisión externa.
- Análisis del alcance, relevancia e integridad de los contenidos incluidos en el EINF del ejercicio 2024 en función del análisis de materialidad realizado por el Grupo y descrito en la nota "1.4.1 Información sobre el proceso de evaluación de la importancia relativa", considerando contenidos requeridos en la normativa mercantil en vigor.
- Análisis de los procesos para recopilar y validar los datos presentados en el EINF del ejercicio 2024.
- Revisión de la información relativa a los riesgos, las políticas y los enfoques de gestión aplicados en relación con los aspectos materiales presentados en el EINF del ejercicio 2024.
- Comprobación, mediante pruebas, en base a la selección de una muestra, de la información relativa a los contenidos incluidos en el EINF del ejercicio 2024 y su adecuada compilación a partir de los datos suministrados por las fuentes de información.

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En relación con el proceso de verificación de la información sobre sostenibilidad:

- Realización de indagaciones ante el personal del Grupo:
  - para conocer el modelo de negocio, las políticas y los enfoques de gestión aplicados, los principales riesgos relacionados con estas cuestiones y obtener información necesaria para la revisión externa.
  - con el fin de conocer el origen de la información utilizada por la dirección (por ejemplo, la interacción con los grupos de interés, los planes de negocio y los documentos de estrategia); y la revisión de la documentación interna del Grupo sobre su proceso.
- Obtención, a través de indagaciones ante el personal del Grupo, del conocimiento de los procesos de la entidad de recopilación, validación y presentación de información relevantes para la elaboración de su información sobre sostenibilidad.
- Evaluación de la concordancia de la evidencia obtenida de nuestros procedimientos sobre el proceso implantado por el Grupo para la determinación de la información que debe incluirse en la información sobre sostenibilidad con la descripción del proceso incluida en dicha información, así como evaluación de si el citado proceso implantado por el Grupo permite identificar la información material a ser revelada según las prescripciones de las NEIS.
- Evaluación de si toda la información identificada en el proceso implantado por el Grupo para la determinación de la información que debe incluirse en la información sobre sostenibilidad está efectivamente incluida.
- Evaluación de la concordancia de la estructura y la presentación de la información sobre sostenibilidad con lo dispuesto en las NEIS y el resto del marco normativo de información sobre sostenibilidad aplicado por el Grupo.
- Realización de indagaciones al personal pertinente y procedimientos analíticos sobre información divulgada en la información sobre sostenibilidad considerando aquella en la que es probable que surjan incorrecciones materiales, debido a fraude o error.
- Realización, en su caso, de procedimientos sustantivos por muestreo sobre información divulgada en la información sobre sostenibilidad seleccionada considerando aquella en la que es probable que surjan incorrecciones materiales, debido a fraude o error.
- Obtención, en su caso, de los informes emitidos por terceros independientes acreditados anexos al informe de gestión consolidado en respuesta a exigencias de la normativa europea y, en relación con la información a la que se refieren y de acuerdo con las normas profesionales de general aceptación, comprobación, exclusivamente, de la acreditación del verificador y de que el alcance del informe emitido se corresponde con el exigido por la normativa europea.
- Obtención, en su caso, de los documentos que contengan la información incorporada por referencia, los informes emitidos por auditores o verificadores sobre dichos documentos y, de acuerdo con normas profesionales de general aceptación, comprobación, exclusivamente, de que, en el documento al que se refiere la información incorporada por referencia, se cumplen las condiciones descritas en las NEIS para poder incorporar información por referencia en la información sobre sostenibilidad.
- Obtención de una carta de manifestaciones de los Administradores y la Dirección en relación con el EINF y la información sobre sostenibilidad.

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Otra información

La dirección de la entidad es responsable de la otra información. La otra información comprende las cuentas anuales consolidadas y resto de la información incluida en el informe de gestión consolidado, pero no incluye ni el informe de auditoría de las cuentas anuales consolidadas ni los informes de verificación emitidos por terceros independientes acreditados exigidos por el derecho de la Unión Europea sobre divulgaciones concretas contenidas en la información sobre sostenibilidad y que figuran como anexo del informe de gestión consolidado.

Nuestro informe de verificación no cubre la otra información y no expresamos ningún tipo de conclusión de verificación sobre esta.

En relación con nuestro encargo de verificación de la información sobre sostenibilidad, nuestra responsabilidad consiste en leer la otra información identificada anteriormente y, de este modo, considerar si la otra información presenta incongruencias materiales con la información sobre sostenibilidad o con el conocimiento que hemos adquirido durante el encargo de verificación que pudieran ser indicativas de la existencia de incorrecciones materiales en la información sobre sostenibilidad.

KPMG Auditores, S.L.

47033073M Marta Contreras Hernández (R: B78510153)

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Este informe se corresponde con el sello distintivo nº 01/25/00549 emitido por el Instituto de Censores Jurados de Cuentas de España

2024_

Consolidated non-financial information and sustainability statement 2024

Atresmedia Corporación de Medios de Comunicación, S.A and Subsidiaries

This report was approved by the Board of Directors of Atresmedia Corporación de Medios de Comunicación, S.A. on 26th February 2025.
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