

# AMPER GROUP ENVIRONMENTAL POLICY

# **Corporate Policy**

Approved by the Board of Directors of Amper S.A. at its meeting of 31 January 2025



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## 1. PURPOSE

This Policy stems from the Sustainability Policy, and its primary objective is to implement measures to prevent, and when this is not feasible, reduce, the environmental impact generated by the Amper Group's activities, products and services. The Policy also promotes a culture of environmental awareness among all Amper Group collaborators, encouraging them to identify and implement measures to minimise environmental impact, manage risks and seize opportunities. In this way, it contributes to sustainable development by taking into account environmental and stakeholder analysis, among other factors.

#### 2. SCOPE

This Policy applies to all Amper Group directors, administrators, managers and employees, regardless of their employment contract, as well as to investee companies, partners and key suppliers when carrying out business activities.

For the purposes of this Policy, the "Amper Group" is understood to be all those companies, firms, branches, consortia, etc. in which Amper has a dominant or controlling interest in another company because it: (i) directly or indirectly holds the majority of the voting rights; (ii) has the power to appoint or dismiss the majority of the members of the governing body; (iii) can dispose of, by virtue of agreements entered into with third parties, the majority of the voting rights, and (iv) has appointed the majority of the members of the governing body using its votes.

#### 3. REFERENCE FRAMEWORKS

- Resolutions and agreements on Climate Change, such as the Paris Agreement.
- The United Nations Sustainable Development Goals (SDGs), approved in 2015, which form part of the 2030 Agenda, particularly Goals six, seven, twelve, thirteen, fourteen, fifteen and seventeen.
- The Ten Principles of the United Nations Global Compact, an initiative of which the Amper Group is a member. In particular Principles 7, 8 and 9 related to the environment.
- Environmental Liability Act, Law 11/2014, of 3 July.
- Water Act, Royal Decree 2/2023 of 10 January.
- Waste and Contaminated Soil Act, Law 7/2022 of 8 April.
- Packaging and Waste Act, Royal Decree 1055/2022 of 27 December.
- Noise Act, Royal Decree 1367/2007, of 19 October.
- Environmental Assessment Act, Law 9/2018 of 5 December.
- Air Quality and Atmospheric Protection Act, Law 34/2007 of 15 November; and Royal Decree 818/2018 of 6 July
- Greenhouse Gas Emission Allowances Act, Law 9/2020 of 16 December.



## 4. GENERAL PRINCIPLES

To concretise the Amper Group's commitment to environmental protection and pollution prevention in all its operations, the following principles of action are defined in this Policy:

**Regulatory Compliance:** comply with all local, national and international environmental legislation and regulations applicable to the company's products and services. The company will also voluntarily adopt recognised standards and certifications that reinforce its environmental commitment.

**Environmental Management:** develop and implement Environmental Management Systems in all Amper Group companies to help the organisation detect its main environmental risks and impacts.

**Pollution Prevention:** implement preventive measures to avoid air, soil and water pollution in all operations. Pollution should be avoided or reduced in all its forms by controlling the materials used and the waste generated, preventing incidents and ensuring that established operational procedures are applied.

**Sustainable Resource Management:** optimise the use of natural resources, such as water and raw materials, by implementing practices that encourage the reduction, reuse and recycling of materials, as well as the rational use of natural resources.

**Energy Efficiency:** continuously improve the energy efficiency of the facilities and production processes. Promote the adoption of renewable energy and constantly seek ways to reduce energy consumption in operations.

**Waste Management:** implement waste management strategies that minimise waste generation, promote reuse and recycling, and ensure the proper disposal of hazardous waste. The Group strives to achieve a "zero waste" target for its activities.

**Climate Change:** assess risks related to climate change and incorporate mitigation and adaptation strategies into operations, where these risks are relevant. Strive for reducing emissions of greenhouse gases and other pollutants to actively contribute to the fight against climate change and reduce the environmental footprint of the organisation and its value chain.

**Circular Economy:** integrate circular economy principles into all processes, products and services to maximise the efficient use of resources and raw materials, including water and energy. This includes promoting the use of alternative and renewable resources obtained sustainably, as well as encouraging the development of new products with reduced environmental impact.

**Continuous Improvement:** periodically review our environmental objectives and targets to ensure they are aligned with industry best practice and the latest available technologies. Establish monitoring indicators to measure the organisation's environmental impact. Encourage the continuous improvement of environmental performance by evaluating and updating procedures, processes and technologies.

**Sustainable Sourcing:** incentivise the purchase of environmentally-friendly and energy-efficient products.



**Technological Innovation:** promote research and development of new technologies that can contribute to environmental improvement and the transition towards a sustainable and circular economy.

Awareness-raising and Capacity-building: promote environmental awareness among our employees, partners and clients through training and communication programmes on sustainable practices, disseminate this Policy and promote learning and awareness in this area.

**Stakeholder Engagement:** report our environmental performance transparently and share our environmental protection initiatives with our stakeholders and the general public.

**Value Chain:** extend the Amper Group's commitment to environmental protection and promotion to the entire value chain. This involves identifying and reducing environmental impacts through contractual safeguards and incorporating environmental criteria into supplier approval, selection and evaluation processes, while also establishing mechanisms to detect inadequate practices in this area.

**Ensure Senior Management Leadership and Commitment:** integration of environmental criteria into business decision-making processes, including risk and opportunity assessment, financial resource allocation, investment decisions, M&A, supply chain and supplier management, real estate management, among other procedures that could impact the environment.

#### 5. GOVERNING BODIES AND RESPONSIBILITIES

## **Board of Directors**

Responsible for approving, reviewing and updating this Policy where necessary.

#### The Sustainability Committee of the Board of Directors

It oversees compliance with the principles of the Policy, regularly monitoring and evaluating its progress.

#### **Steering Committee**

Its role is to ensure the dissemination of, and compliance with, the principles of this Policy. It approves objectives, oversees their implementation and ensures the allocation of the resources required to maintain environmental management systems, implement initiatives and achieve objectives.

#### **Corporate Sustainability Division**

It proposes updates to the Policy and sets environmental priorities and objectives that are aligned with the Strategic Sustainability Plan.



# Environmental Management Departments of companies/subsidiaries and business areas

They are responsible for:

- Establishing improvement objectives in their area of responsibility that are aligned with the corporate objectives established in the sustainability area.
- o Implementing and maintaining environmental management systems, including audit plans.
- Defining and implementing environmental management methodologies and tools.
- Monitoring and reporting environmental indicators.
- o Ensuring environmental training and awareness-raising.
- Ensuring that the principles of this Policy are applied to existing operations and each new project and/or process.

#### **Internal Audit Division**

It incorporates into the audit universe those aspects related to environmental performance in the Group's operations.

It reports periodically on the Risk Map those environmental performance risks identified by managers if they exceed the approved risk appetite for the corresponding financial year.

## **Heads of Business Areas / Budgetary Units**

They guarantee the implementation of this Policy by providing the necessary resources and ensuring compliance with the environmental objectives in their respective activities and processes.

#### 6. POLICY REVIEW AND FOLLOW-UP

This Policy will be reviewed periodically to adapt to any emerging needs arising from changes in European, national, regional or local regulations.

To ensure its proper implementation, the entity shall set up a monitoring committee or designate a responsible person to supervise compliance and regularly assess progress against the established objectives.