

**Befesa Aluminio, S.L.**

**Les Franqueses del Vallès Plant**

**Befesa Aluminio, S.L.**

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This document constitutes the environmental declaration of Befesa Aluminum, S.L.- Erandio plant corresponding to the year 2021. It has been prepared taking into account the requirements established by regulations (CE) No. 1221/2009, (CE) No. 1505/2017 and (EC) No. 2026/2018 of the European Commission, regarding the voluntary participation of organizations in a community environmental management and audit system (EMAS).

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## **1. Description of the organization's registration in EMAS**

### **1.1 European Union Regulations No. 1221/2009, No. 1505/2017 and No. 2026/2018**

Regulation No. 1221/2009 or eco-audit known by its acronym in English EMAS (Environmental Management Audit Scheme) is a system by which organizations are allowed to adhere voluntarily to a community system of management and environmental audits. In 2017, Regulation No. 1505/2017 was published and entered into force, which partially modifies (Annex I, II and III) the aforementioned Regulation. In 2018, Regulation No. 2026/2018 was published, amending Annex IV.

These regulations have three fundamental commitments:

- Internal control of the environmental impacts of the process and its corresponding registration under the basic assumption of compliance with the applicable environmental legislation.
- Continuous reduction of said impacts, defining and publishing the objectives and actions to achieve them, as well as the control and results through continuous environmental audits.
- Commitment to total transparency towards society and other bodies.

### **1.2 Environmental declaration**

It is the essential element of the system, since it involves making the company's environmental data available to society:

- Consumption of raw materials, water, electricity, fuel, emissions, effluents, waste, etc.
- The company's environmental policy, ensuring compliance with applicable regulations and in turn the commitment to continuous improvement based on quantifiable objectives and pollution prevention.
- Validation of the system audit, as well as compliance with regulations, all through an authorized verifier.

In short, to make our activity known to society, provide key data and ensure the environmental compliance of our company.

### **1.3 Befesa Aluminio, S.L. as a member of the system**

On a voluntary basis Befesa Aluminum, S.L. with code NACE 2453 (light metal foundry) has decided to adhere to the system, for making its environmental commitment clear to society, in the development of its daily activity. This is defined as:

"Manufacture of aluminum alloys in solid state. Aluminum waste treatment. Purchase and sale of by-products of aluminum and other non-ferrous metals".

## **2. Description of the organization's registration in EMAS**

The company Befesa Aluminum, S.L., has 3 work centers of recognized international prestige located in the towns of Erandio (Bizkaia), Les Franqueses del Vallés (Barcelona) and Bernburg (Germany). All of them are classified as aluminum refineries and are located within the so-called eco-industry sector, due to the fact that they are dedicated to the recycling, recovery and recovery of all types of waste from the aluminum industry. The total recycling process operated allows the recovery of the free metal of all the materials it processes, as well as the oxide that inevitably accompanies them, providing an important alternative to primary type aluminum and the high energy consumption required to obtain it and assuming consequently an inexhaustible source of obtaining metals compared to mining extraction, consequently prolonging the rate of depletion of the planet's natural resources.

The activities carried out by Befesa Aluminum, S.L. They constitute an important and fundamental link in the life cycle of aluminum. The activities carried out in the primary aluminum production plants, aluminum transformation and finishing facilities, or aluminum foundries in general, would be totally unviable without the presence of industries such as Befesa Aluminum, S.L., responsible for the treatment, recovery and recycling of the waste they generate. By converting said waste into assimilable raw materials, Befesa Aluminum, S.L. Since its inception, it has focused its activities on the production of aluminum alloys under any type of specification for the molding of injected parts for the automotive, electrical appliance and construction sectors.

The global computation of its activities has placed Befesa Aluminum S.L. as the main company in its activity in Spain and one of the largest in Europe. The relationship that Befesa Aluminum, S.L. has maintained and maintains with world-renowned groups and companies and taking advantage of the knowledge acquired has contributed to Befesa Aluminum, S.L. be an aluminum recycling industry with suppliers and customers around the world such as manufacturers in the automotive sector and supplier foundries.

### 3. Environmental management system

Our environmental management system is made up of the following elements:

- Environmental Policy: formally describes the guidelines and objectives of Befesa Aluminum, S.L. in its relationship with the environment.
  
- Environmental management program, which includes the necessary activities to be carried out to meet the objectives.
  
- Documentation of the environmental management system, which mainly consists of:
  - Context of the organization: describes the external and internal issues that are relevant to the purpose of the company and that affect its ability to achieve the intended results of its environmental management system.
  
  - Scope of the organization: determines the limits and applicability of the environmental management system.
  
  - Procedures: describe the development of the activities carried out by the company.
  
- Internal environmental audits, as management tools to assess the development and effectiveness of the implemented environmental management system and identify opportunities for improvement.
  
- Annual review of the system by management to assess the implementation and effectiveness and establish new goals for continuous improvement.

- Evaluation of environmental aspects.
- Registration of legislation and identification and evaluation of applicable legal requirements.

In addition, it has three main objectives:

- The commitment to comply with the legal and other requirements that apply to this facility.
- Carry out our recycling activity in an environmentally friendly manner, paying special attention to those activities and products that could entail risks for the environment.
- Continuous improvement from the environmental point of view.

These bases come from the guidelines established by our management policy, which has been revised in September 2021 without major changes in its content.

### **Quality, prevention, environment and energy policy**

#### **Values**

We promote the Quality of our products and processes, the defense of the Environment, the Safety and Health of our direct and indirect workers and the Sustainable Development of our environment.

## **Policy**

Befesa Aluminum, S.L. aspires to become a world leader in the aluminum sector in terms of Quality, Prevention, Environment and Efficient Energy Management, convinced that this is the only path to its productive excellence.

## **Principles**

- The company's management and the entire line of command must be the first example of commitment, image and zero tolerance and we assume the final responsibility in the areas of Quality, Safety, the Environment and Energy Management.
- We believe that people are the main basis of our business and for this reason we train them and provide them with the capacity to act in the areas of Quality, Safety, the Environment and Energy Management, treating them with respect and in a fair and providing ongoing support to staff affected by health issues.
- We assume the involvement of all people as a fundamental basis for success, promoting dialogue, consultation and their active and continuous participation to achieve the established objectives and goals that will be reviewed periodically by the Management.
- The Safety and Health of the workers, the conservation of the Environment, the efficient management of energy and the satisfaction of all our clients, are part of the daily work of each one of the workers.
- We never put Production or Economic Benefit before the Safety and Health of people.

- We assume the principle of "Zero Accidents" as the company's objective, promoting the elimination of dangerous ones and the continuous reduction of identified risks.
- We believe that all accidents are preventable and that all accidents and incidents must always be reported and investigated as a basis for continuous improvement.
- We adopt the commitment to provide ourselves with the necessary material and technical resources to promote the continuous improvement of all our production processes, as well as environmental and energy protection and performance and the generation of a safe and accident-free work environment.
- We acquired the commitment to provide safe and healthy working conditions for the prevention of injuries and deterioration of health related to work.
- We ensure that absences due to illness are managed responsibly, consistently and fairly, promoting and developing a positive culture through proper management and control of absenteeism.
- We support the acquisition of energy efficient products and services, as well as responsible design to improve energy performance.
- We ensure compliance with all legal and regulatory requirements, as well as established internal and external standards and requirements.
- We developed an Integrated System that covers the areas of Quality, Prevention. Environment and Energy Management, which is periodically reviewed and audited in accordance with internationally recognized norms and standards.

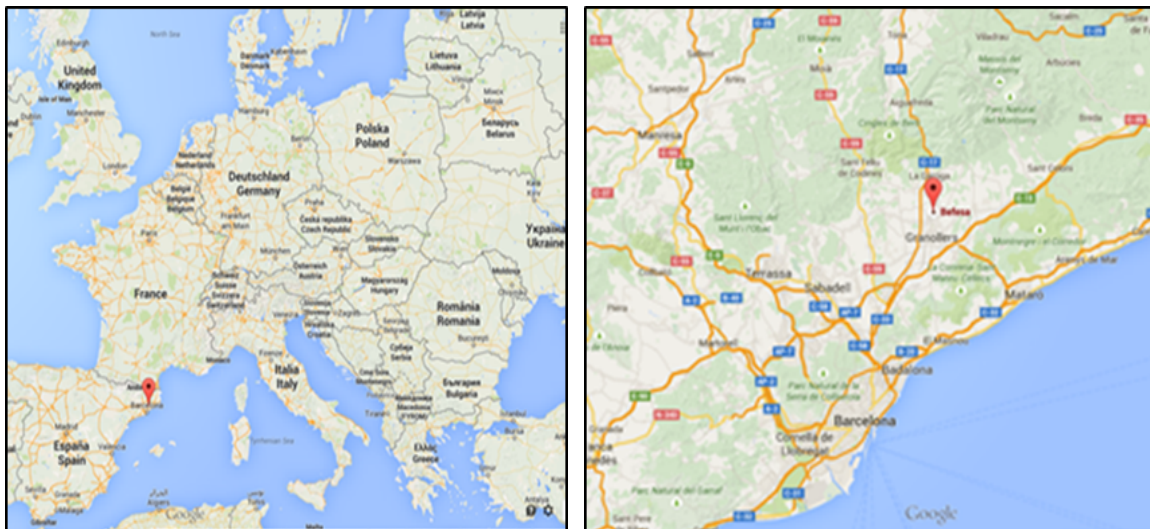
Erandio, september 2021

In accordance with the requirements imposed by the internationally recognized standard ISO 14001:2015, the managing director of Befesa Aluminum, S.L. has appointed the following person to ensure the implementation and maintenance of the established environmental management system:

- **Oskar de Diego Rodríguez**, director of the environment, as delegate of the management to establish, implement and keep up to date the environmental management system and at the same time guarantee compliance with all applicable environmental requirements.

It is worth highlighting the integrated management that is currently being carried out of the quality, prevention, environment and energy systems with the aim of advancing jointly in the four fields, simplifying efforts, but maintaining the rigor and seriousness characteristic of the four individualized concepts that does not compromise the well-being of our future generations.

#### 4. Befesa Aluminio, S.L.- Les Franqueses del Vallés plant



The company Befesa Aluminum, S.L.-Les Franqueses del Vallès plant-, has been located in the municipality of Les Franqueses del Vallès (Barcelona) since 1985. The formats in which it presents its final products are:

- Aluminum ingots and their alloys weighing 7 - 10 kg for molding.

Below is a detailed plan of the facilities of the Les Franqueses del Vallés plant and the organizational chart of Befesa Aluminum, S.L.

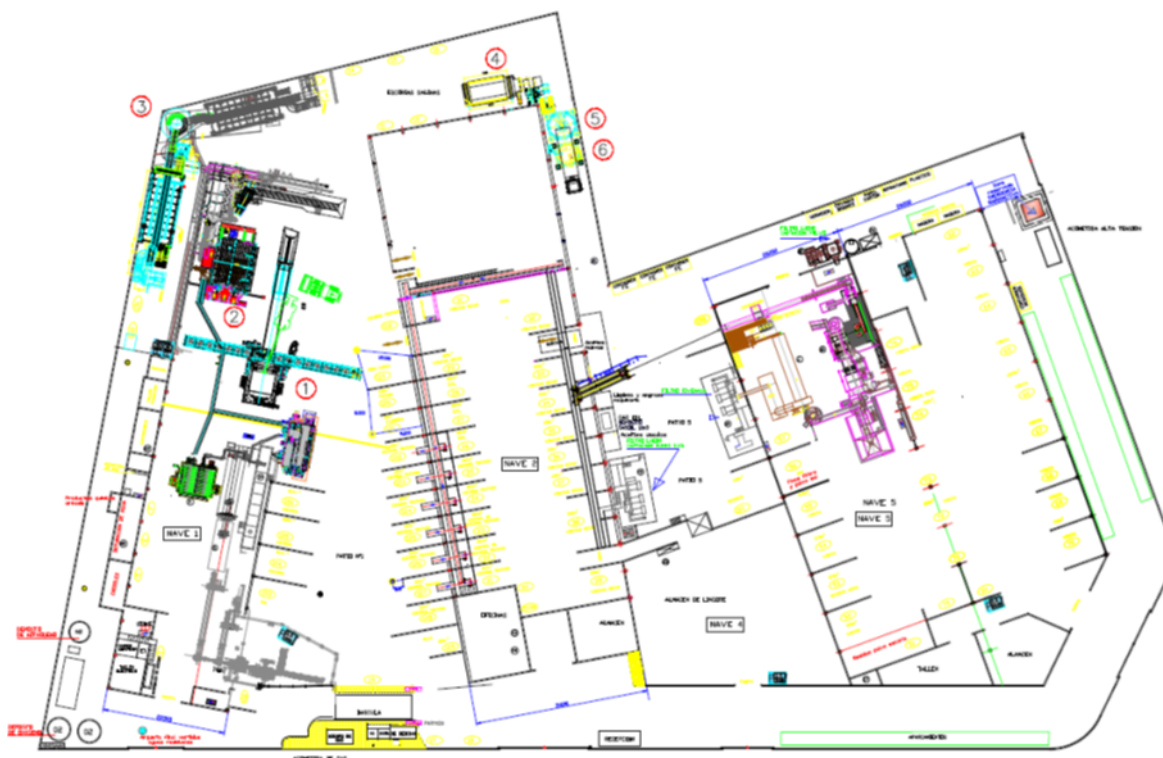


Image 1: Plan off Les Franqueses del Vallés facilities.

Organigrama de Befesa Aluminio, S. L

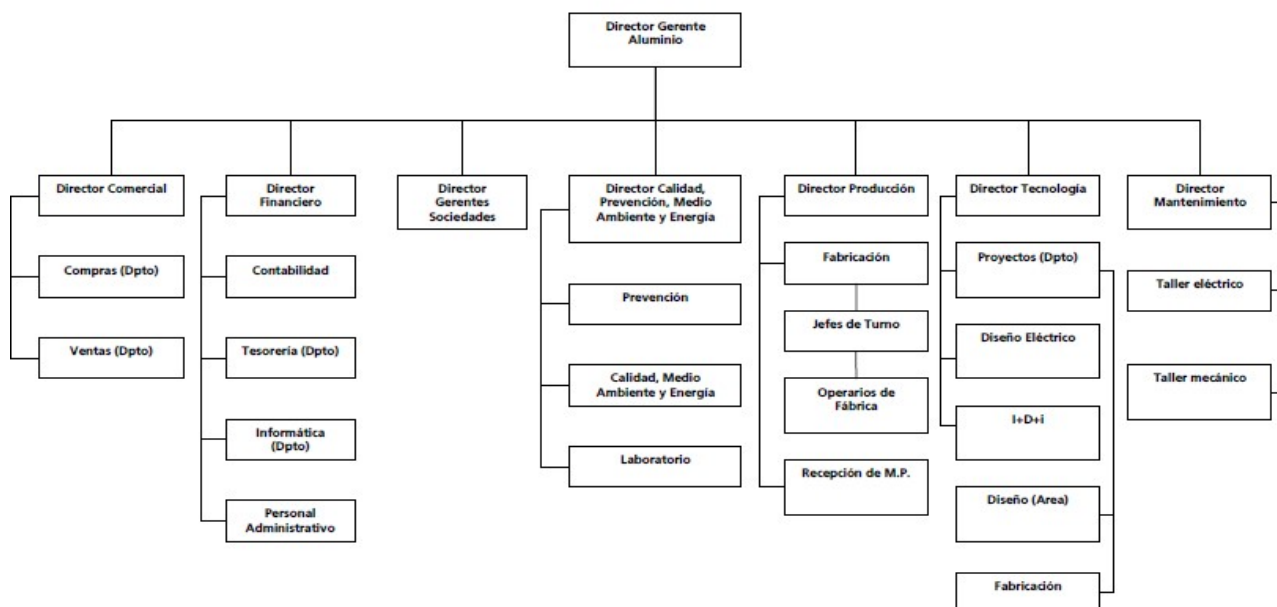


Image 2: Organization chart of the Befesa Aluminum, S.L. plant

The recycling and recovery process carried out at the Les Franqueses del Vallès plant consists of two main processes: one for the initial melting of the materials in rotary and vortex type ovens, and another for refining the final product in reverberatory type ovens. Both processes are associated with installations considered as BAT (Best Available Technique) in the "Reference Document for the Best Available Techniques of non-ferrous metallurgy" prepared at the request of the European Commission.

The production process begins with a correct selection of raw materials, among which we highlight cuttings, cables, casing, pots, cans, lithography, shavings, foams and, in general, all kinds of scrap and waste from the aluminum sector. These raw materials, once selected and, in the case of chips, treated by the two chip dryers, are melted in the appropriate proportion to obtain the approximate specification requested by the end customer, using a vortex-type oven and a rotary type furnace to which quantities of salt are added as a flux and protector of the molten aluminium.

The fusion of these materials, properly understood, is not only to bring the raw material to the liquid state, but also to dissolve the metallic elements in suspension and promote some cleaning reactions of the material, the latter being what differentiates a rotary type furnace from others. types of ovens. Verifying that the furnace temperature is adequate, that the material is molten and that the quality of the supernatant flux is as expected, the furnace is emptied in two stages, first removing the metal and ending with the molten flux salt or salt slag.

The gases produced during this fusion process are evacuated through purification systems, consisting of cooling systems and bag filters, where the solid particles are

retained and where the neutralization treatment of the acid combustion gases is carried out at the same time. generated, through the controlled addition of calcium hydroxide.

For its part, the salt slag obtained as a result of the use of salt during the described melting process is completely recycled and recovered, giving rise in turn to an aluminum oxide (paval) that has various applications in the industrial sector. cement plants, definitively closing the cycle of recovering the aluminum waste described.

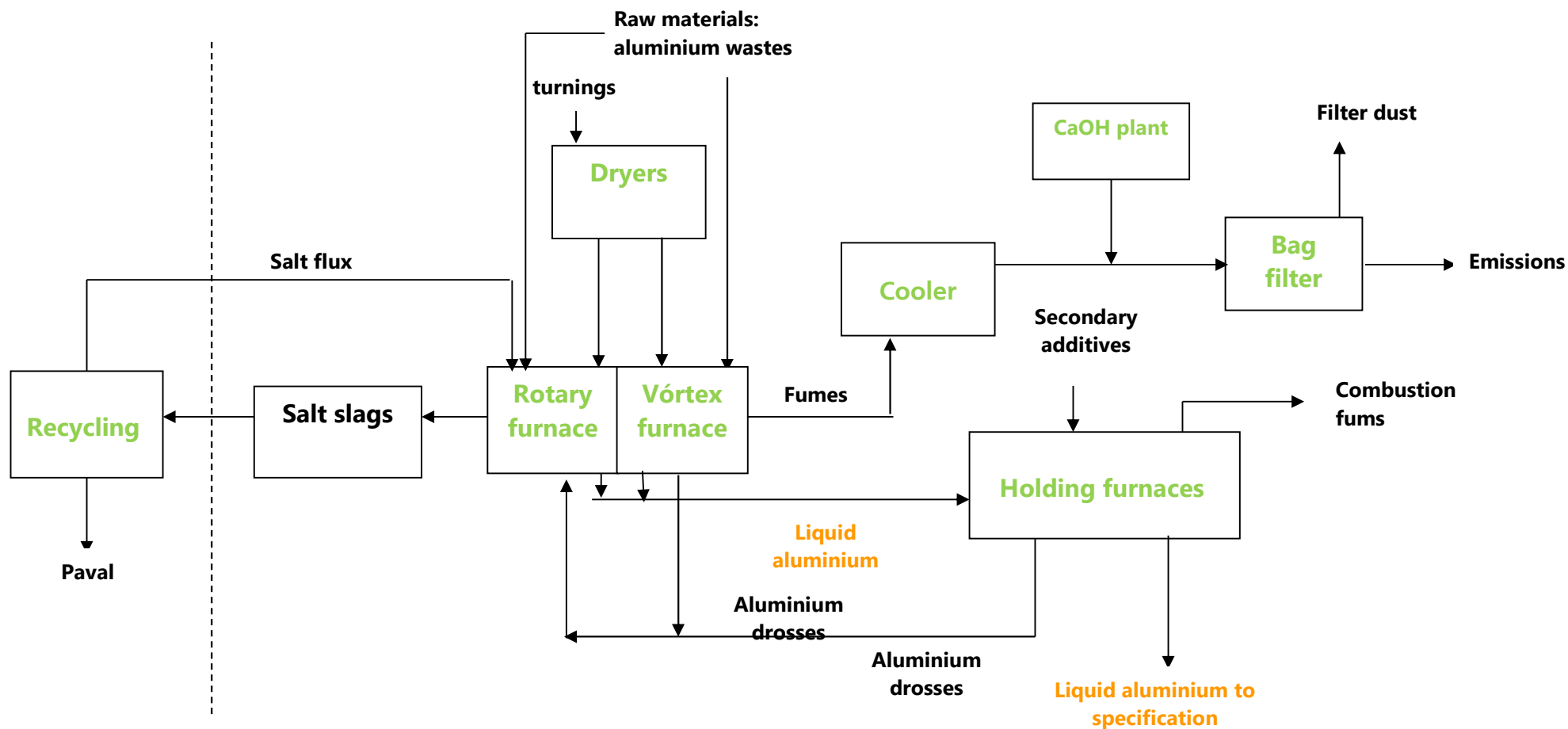


Illustration 3: Flow diagram of the process for obtaining aluminium in liquid form.

Once the raw materials have been melted in the rotary and vortex furnaces, they are transferred in a second phase to the reverberatory-type furnaces with loading wells, where the liquid aluminum is definitively adjusted to the requested specifications by melting secondary addition elements such as the Si, Cu or Mg. Reverberatory furnaces are appropriate for this final phase of production, since they provide a metal at rest and that is adjusted in its quality parameters under controlled thermal conditions.

Once the metal has been deslagging and the temperature has been adjusted, the casting operation is carried out. The liquid aluminum is directed to the casting wheel for the shaping of ingots that allows, with total reliability and a high production sequence, to obtain ingots with high surface quality. The ingots are cooled, turned over and transported to the layer stacking machine, in which the formation of the stacks is completely automatic, through the use of a powerful computer that allows different package formats to be obtained according to customer requirements.

The water used during the cooling process is recirculated through three cooling towers that in turn have the corresponding filtering systems. The water from the cleaning purges of the aforementioned filtering systems is homogenized with the runoff water, generating a single point of discharge to a municipal collector that complies with all the limits imposed in the corresponding integrated environmental authorization.

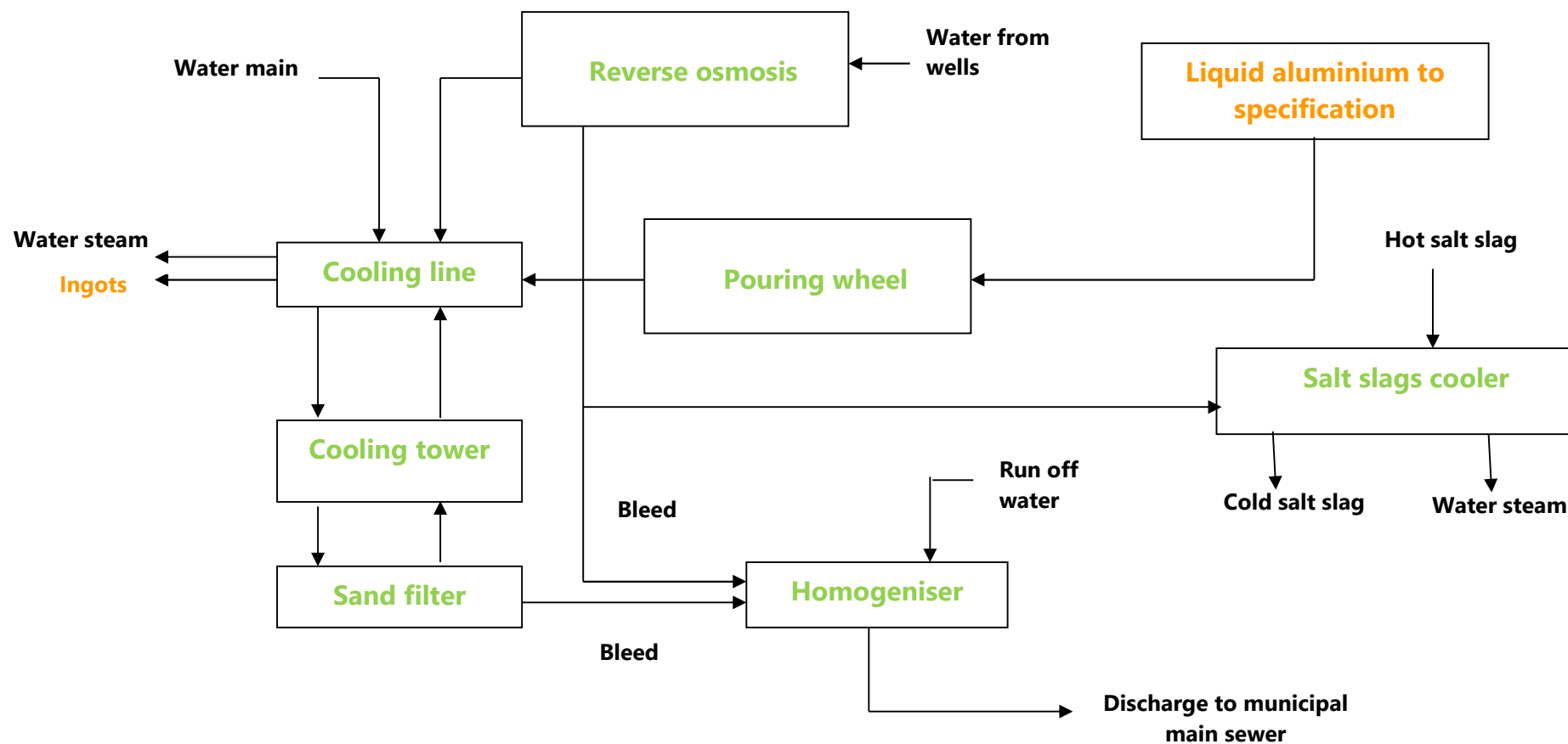


Illustration 4: Flow diagram of the ingot and liquid aluminium manufacturing process.

The global calculation of production has placed the total average production of the Les Franqueses del Vallés plant in recent years (2019-2021) at 61,729.038 t of finished product (See page 33), with approximately 14% of its market being foundries of the national territory and 86% foreign clients.

All the products supplied by the company go through a prior final quality control and are perfectly identified in such a way that it is possible to maintain their total traceability, in relation to the manufacturing process, raw materials used and controls carried out. All this is managed through our quality management system with ISO 9001 certification.

In addition, in accordance with its activities aimed at the conservation of natural resources and the protection of the environment, we consider it necessary to carry out our activity with the least possible local environmental impact. Aware of this need, we decided to implement an ISO 14001 environmental management system in 2003, subsequently verified according to the European EMAS regulation in 2005 with the registration number ES-CAT-000203, which is completed with the ISO 50001 certification of energy management achieved for the first time in 2016.

## **5. Representative environmental aspects of the Les Franqueses del Vallés plant**

The most representative environmental aspects of the plant are the following:

### **A) Atmospheric emissions**

The plant has three foci associated with the facilities that are part of the production process, which correspond to the unified smelting focus (it includes reverberatory furnace 2, reverberatory furnace 3, vortex furnace, tilting rotary furnace and slag cooler). , drying room No. 1 + drying room environment + laboratory oven and drying room No. 2.

Periodically, an officially approved laboratory (OCA) takes samples of the emissions produced in these sources described, subsequently analyzing the compounds that in each case mark the integrated environmental authorization.

In order to ensure the proper functioning of the purification systems associated with the outbreaks, internal action procedures have been developed, which are part of the integrated environmental management system, in which the continuous and periodic controls that must be carried out at the environmental level are defined. plant to detect any anomaly, as well as the establishment of the appropriate corrective actions.

## **B) Waste production**

The company has the corresponding integrated environmental authorization (BA20120011), its substantial change (B1CS160297) and its non-substantial changes (B1CNS180276 and B1CNS200584) which, in turn, contains the authorization for the producer of hazardous and inert waste with the producer code P-03570.1.

- **Hazardous wastes**

The most significant hazardous wastes are the following:

- **Salt Slag:** As a result of the use of salts (NaCl and KCl) as a flux to prevent unwanted oxidation of the liquid aluminum inside the tilting rotary furnace in contact with the atmosphere. Said salt slag is fully recycled in what constitutes a fully integrated aluminum waste treatment process within the Befesa Group, giving rise to a new salt that can be used in new production processes and an inert residue, rich in aluminum oxide called Paval, which has innumerable applications in the world of cement factories.
- **Filter dust:** As a consequence of the treatment of the combustion gases through the purification systems present in the factory, and of the loads and movements of material in the ovens and in the dryers. They are stored in a silo enabled for this and under cover, in big-bags, until their final shipment to an authorized manager.

- Filter sleeves: As constituents of combustion gas purification systems. Damaged or deteriorated sleeves are replaced and sent to an authorized manager.
- Used oils: Coming from the maintenance operations of the installations and machinery, they are stored in duly identified and dated deposits while waiting to be sent to an authorized manager.
- Empty contaminated plastic containers: Containers that have contained chemical products, solvents, oils, etc. They are stored in a perfectly identified warehouse for shipment to an authorized manager.
- Contaminated absorbent, rags and clothing: Coming from maintenance operations, they are stored in correctly identified and dated drums until they are definitively sent to an authorized manager.

The company has the corresponding acceptance documents from each of the authorized managers with whom it manages the aforementioned hazardous waste.

- **Inert wastes**

The inert industrial waste produced at the plant is basically that which comes from the operations of repairs, reforms or improvements that meet the aforementioned definition. Said waste and its management are as follows:

- Metal waste (iron scrap): they are disposed of in a drawer provided for this purpose. When it is at full capacity, a company dedicated to the removal and management of this type of material is notified.
- Refractory, rubble, wood, paper, cardboard and plastics: The used refractory is generated as a result of the maintenance of the lining of the rotary and reverberatory type melting furnaces with loading well. For its part, rubble, wood, paper and cardboard, and plastic arise as a result of civil works carried out in the company and the reception of materials. This type of waste is selectively collected and sent to an authorized manager.
- General waste not selectively collected. These go to landfill.

### **C) Depletion of natural resources**

Taking into account aspects related to the management of natural resources in the plant, the company has within its integrated management system a method of identification, monitoring and control of the resources used.

These resources correspond to the consumption of natural gas, used in the operation of ovens and dryers, electricity consumption, water consumption for sanitary use and for cooling ingots, diesel (mobile machinery and chip dryers), oxygen (tilting rotary furnace) and nitrogen (used in reverberatory furnaces for the homogenization and degassing of liquid metal).

## 6. Significant environmental aspects of the Les Franqueses plant

As a basis for defining the environmental objectives, the direct and indirect environmental aspects are evaluated annually. For this, criteria such as probability and severity are applied, obtaining the individual degree of significance of each of them. This makes it possible to determine the future work areas on which to centralize efforts, in order to minimize the company's global environmental impact.

Based on the aforementioned severity and probability criteria, and after applying the rest of the criteria applied by the company in the internal evaluation process of all its environmental impacts, the impacts defined as significant for the year 2021 are summarized below:

- Confined emission of PST, PCCD/F, Cl<sub>2</sub>, HF, Hg, HCl, TVOC, CO, NO<sub>x</sub>, and SO<sub>2</sub> as a consequence of the routine operation of melting materials in the tilting rotary furnace, vortex furnace, reverberatory furnaces, slag, laboratory furnaces and chip dryers, whose associated aspect is potential atmospheric contamination.
- Diesel consumption as a result of the routine operations of shovels and forklifts and the drying of chips, whose associated aspect is the disappearance of natural resources.

For all impacts classified as significant, Befesa Aluminum, S.L. establishes a strict and periodic control of the same, at the same time associating strategic objectives and environmental indicators of control and improvement, which

allow it to guarantee the present and future environmental performance of the company.

Befesa Aluminum, S.L. It also monitors and evaluates indirect environmental aspects, including those aspects on which it does not have full capacity to act. As main indirect environmental aspects in 2021, we highlight the following:

- Generation of used oils and batteries by subcontracted transport companies.
- Generation of emissions and ammonia odor associated with potentially wet raw materials.
- Potential presence of radioactivity associated with the raw materials received.
- GHG emissions associated with services and supplies.

## **7. Summary of environmental objectives and targets 2021**

On an annual basis, a series of environmental objectives are established, which are included in the annual environmental plan, where the goals associated with each of them are defined, as well as the corresponding allocation of human and material resources. The environmental objectives defined for the year 2021 are described below, making a brief summary of their final degree of implementation:

Aspect	Target	Target value	Result
CO2 emissions	Reducir un 2 % las emisiones de gases de efecto invernadero asociadas a la producción de aluminio secundario.	-2 %	-1.82 %
PST+NOx+COVT+HCl+HF+CO+SO2+PCCD+Cl2+Hg emissions	Reducir un 2 % las emisiones atmosféricas totales en chimenea, controlando además el correcto cumplimiento de los límites legalmente establecidos.	-2 %	-31.55 %
Natural gas consumption	Disminuir un 2 % el consumo total de gas natural empleado en la actividad asociada a los procesos productivos.	-2 %	-8.58 %
Natural gas consumption	Disminuir un 2 % el consumo total de gas natural empleado en la actividad asociada a los procesos de tratamiento de viruta.	-2 %	-5.02 %
Electricity consumption	Reducir un 2 % el consumo eléctrico empleado durante la actividad asociada a los procesos productivos.	-2 %	-10.11 %
Gasoil consumption	Reducir un 2 % el consumo de gasoil empleado en la maquinaria móvil.	-2 %	-15.71 %
Nitrogen consumption	Reducir un 2 % el consumo de nitrógeno empleado durante la actividad asociada a los procesos productivos.	-2 %	+19.05 %
Oxygen consumption	Reducir un 2 % el consumo de oxígeno empleado durante la actividad asociada a los procesos productivos.	-2 %	-6.42 %
Slat flux consumption	Reducir un 2 % el consumo de fundente empleado durante la actividad asociada a los procesos productivos.	-2 %	-14.55 %
Salt slag generation	Disminuir un 2 % la generación de escoria salina generada durante la actividad asociada a los procesos productivos.	-2 %	-8.44 %
Filter dust generation	Reducir 2 % la generación de polvo de filtro.	-2 %	+0.30 %

- **To reduce 2 % for GHG emissions associated to secondary aluminium production.**

At the beginning of 2021, a joint GHG emission minimization objective was defined for the centers that make up Befesa Aluminum, S.L. Said objective was associated with emission sources corresponding to the two types of scope that are

contemplated in the company's inventory and that refer to direct emissions (scope 1) and indirect emissions (scope 2). After computing the emissions from these sources throughout the year 2021, it has been observed that Befesa Aluminum, S.L. it has not exactly met the 2% minimization objective, presenting a relative improvement percentage of 1.82% (0.2593 teq CO<sub>2</sub>/ t in 2021 compared to 0.2641 teq CO<sub>2</sub>/ t in 2020). The reduction was mainly due to the higher production obtained in the plants as a result of the important structural works and installations implemented throughout the year 2021.

- **To reduce 2% total atmospheric emissions in chimney.**

During 2021, the total atmospheric emissions in the stack have been controlled, obtaining as a result 1,187 kg of PST+NO<sub>x</sub>+TVOC+CO+PCCD/F+HCl+HF+Cl<sub>2</sub>+Hg/tn finished product. The value in 2020 was 1.734 kg of PST+NO<sub>x</sub>+TVOC+CO+PCCD/F+HCl+HF+Cl<sub>2</sub>+Hg/tn finished product, which represents a very significant reduction of exactly 31.55%. The reason for this improvement in emissions is directly related to the results obtained in emissions from the different sources of the plant during 2021, with the concentrations of pollutants being lower than the previous ones. Good maintenance of the condition of filter bags and purification systems have contributed to a significant reduction in emissions.

- **To achieve a 2 % decrease in total natural gas consumption associated with the plant's production processes.**

The relative consumption of natural gas associated with production processes has decreased significantly in 2021 (0.927 MWh/ t manufactured product), compared to the values reached in 2020 (1.014 MWh/ t manufactured product). This reduction of

8.58% allows us to achieve the established objective of a 2% reduction. During 2021, the tilting rotary kiln and the vortex kiln have been worked together, which has led to better gas consumption than working only with the vortex kiln, as was done during the last months of 2020.

- **To achieve a 2 % drop in natural gas consumption associated to shavings dryers.**

On the other hand, the consumption associated with the chip treatment process in 2021 was 0.284 MWh/ t chip treated, compared to 0.299 MWh/ t chip treated in 2020. Therefore, a decrease of 5.02% has been obtained, achieving the objective set at the beginning of the year. This decrease is associated with the quality of the processed materials, specifically the chips, with less humidity than the previous year. ad associated with the plant's chip treatment processes.

- **To achieve a 2 % drop in electricity consumption associated with the plant's production processes.**

The relative electricity consumption during the year 2021 has decreased with respect to the values reported in the year 2020. The initially proposed decrease objective has been achieved mainly due to the increase in production in the year 2021 and as a consequence of the structural works that took place during all year. The specific consumption of the year 2021 reaches values of 0.080 MWh/ t, which represents a decrease of 10.11% with respect to the consumption of the year 2020 (0.089 MWh/ t). The objective, therefore, has been achieved.

- **To achieve a 2 % drop in the amount of gasoil used in the plant's production processes.**

The proposed objective of reducing diesel consumption directly associated with mobile machinery and the manufactured product has been achieved, decreasing by 15.71%. The relative value of 2021 has decreased compared to 2020, 0.059 GJ/ t product manufactured in 2021, by 0.070 GJ/ t product manufactured in the previous year. The objective has been achieved due to the higher production compared to the previous year and maintaining the same mobile fleet as the previous year.

- **To achieve a 2 % drop in the amount of nitrogen used in the plant's production processes.**

The relative consumption of nitrogen in the year 2021 has been 0.025 t/ t product manufactured compared to 0.021 t/ t product manufactured in the year 2020. It means that the relative consumption is increased by 19.05%, thus not reaching the initially set target of 2% reduction. The times at the time of alloying in the reverberators have been longer than those of the previous year (alloys with a high Silicon content) and for this reason the reduction has not been achieved.

- **To achieve a 2 % drop in the amount of oxygen used in the plant's production processes.**

The relative consumption of oxygen decreases from 0.109 t/t product manufactured in 2020, to 0.102 t/t product manufactured in 2021, which represents a reduction of 6.42%. The introduction of the vortex oven to the production system, which does not consume this gas, has helped the decline.

- **To achieve a 2 % drop in the amount of flux used in the plant's production processes.**

The relative consumption of flux salt and potash has decreased notably in this year 2021 (0.141 t/ t). A total of 14.55%, compared to the values of the year 2020 (0.165 t/ t). The 2% reduction target has therefore been largely achieved, mainly as a result of the operation of the vortex furnace, an installation that does not use fluxes for melting.

- **To achieve a 2 % drop in the amount of salt slag produced during the plant's production processes.**

The objective of reducing the generation of salt slag has been achieved, mainly due to the nature of the raw materials used to obtain the final product and the quality of the flux, with a higher percentage of KCl and lower humidity. The relative value in 2021 was 0.434 t/t manufactured product, compared to the value of 0.474 t/t manufactured product in 2020, which represents a decrease of 8.44%, thus achieving the objective.

- **To decrease the amount of filter dust produced by 2 %.**

The relative amount of filter dust generated throughout the year 2021 has reached values of 0.0343 t/ t manufactured product, which represents an increase of 0.30% compared to the values of the year 2020 (0.0342 t/ t manufactured product). Said objective has not been met due to the correct optimization of the new unified foundry filter, which sucks in and collects all the emissions from the sources located in the foundry. It should be noted that this fact supposes a very important environmental improvement of the plant.

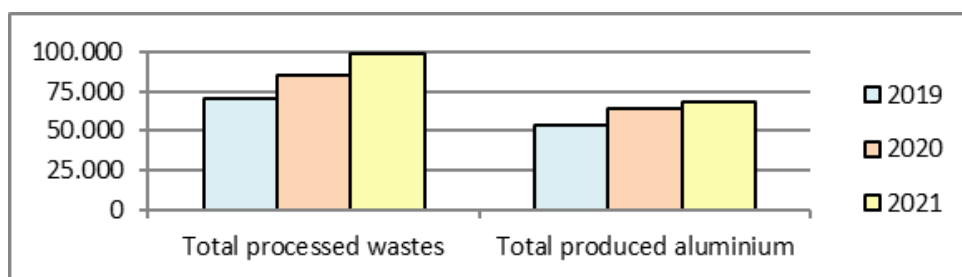
## 8. Environmental performance of the company

The following sections reflect the environmental performance of the company:

### 8.1 Aluminium waste recycling for aluminium recovery

All the materials received, except for the so-called fluxes (NaCl and KCl) and alloying agents, are considered waste according to current national and European regulations. These materials come mainly from other primary and secondary aluminum foundries and from companies that collect aluminum scrap that originate in the market for machining parts, scrapping vehicles and household appliances, and cutting off products. The main function and motivation throughout our production process is the total recovery of said secondary waste as a direct alternative to primary aluminum obtained from the transformation of natural resources.

The total amounts of waste processed in the last 3 years are detailed below, as well as that of secondary aluminum obtained as a result of the recycling operation carried out.



	Total processed wastes	Total processed additives	Total processed material	Total produced aluminium
2019	66,843	3,278	70,121	53,134
2020	80,841	4,380	85,221	64,187
2021	94,451	4,398	98,849	67,866

**Graph 1: Comparison of treated waste and aluminum produced (t) in the last three years**

## 8.2 Energy consumption

The absolute (MWh) and relative (quantity per t of manufactured product) consumption of the main energy resources used in the production process corresponding to the last 3 years are shown below. Throughout 2021 there has been a total direct consumption of renewable electricity amounting to 16.1%, corresponding to the renewable part of the total electricity consumed and a total generation of renewable energy equal to 0 Mwh.

Renewable energy consumed	2019	2020	2021
Consumption (MWh)	1,618.8	917.1	875.6
Relative consumption (MWh/ t)	0.030	0.014	0.013

- **Natural gas**

The fuel used is natural gas, which is used in the melting and refining processes of rotary, vortex and reverberatory furnaces and in the chip drying treatment process. The supply of natural gas is made directly through the network.

Natural gas	2019	2020	2021
Consumption (MWh)	79,338.1	75,774.3	76,767.9
Relative consumption (MWh/ t)	1.50	1.18	1.13

The relative consumption of natural gas has decreased substantially in 2021 (1.13 MWh/ t manufactured product), with respect to the values reached in 2018 (1.18 MWh/ t manufactured product). This reduction refers to the plant's total natural gas consumption. Indicate that during the year the natural gas consumed associated

only with the production process has been monitored, obtaining a value of 0.927 MWh/ t manufactured product (year 2020: 1.014 MWh/t), and on the other hand the consumption associated with the treatment process of chips, with the value obtained in 2021 being 0.284 MWh/t chip treated (year 2020: 0.299 MWh/t). Currently, targets for both indicators are assigned separately, with this decrease in consumption being due to both processes, both chip drying and ingot production.

- **Electricity**

The facilities have two transformation centers located in two booths, one on the façade of warehouse No. 5 and the other on the façade of warehouse No. 1. Both "transformers" have 1,000 kW of power.

As far as lighting is concerned, the use of fluorescent lamps predominates in the offices and LED lights in the production areas and exteriors.

<b>Electricity</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
<b>Consumption (MWh)</b>	5,342.5	5,696.1	5,438.4
<b>Relative consumption (MWh/ t)</b>	0.101	0.089	0.080

Electricity consumption per ton of manufactured product has decreased in 2021, due to the increase in production this year and as a consequence of the structural energy improvements that took place throughout the previous year.

### 8.3 Consumption of auxiliary materials

The absolute (t) and relative (amount per t of manufactured product) consumption of the main auxiliary materials used in the production process corresponding to the last 3 years are shown below.

- **Salt flux**

The fluxing salt is mainly a mixture of NaCl and KCl, which is added to the interior of the tilting rotary kiln, together with the rest of the main raw materials. The mission of the flux salt is to protect the molten aluminum from possible unwanted oxidation, while at the same time being a receptor for the impurities that can potentially accompany the raw materials used. The use of flux salt generates a hazardous waste called salt slag, which is completely recycled within Befesa, giving rise to an aluminum oxide that has various applications in the cement industry sector.

Salt flux	2019	2020	2021
Consumptino (t)	11,027	10,612	9,551
Relative consumption(t/ t)	0.208	0.165	0.141

- The relative consumption of flux salt has been considerably reduced in 2021 with respect to the values reported in 2020, mainly due to the elimination of the fixed rotary kiln, the main consumer of flux due to its working nature and because in the kiln Vortex does not use flux.

- **Oxygen and nitrogen**

The facilities have an external oxygen tank and a nitrogen tank that are the property of the supplier in both cases. Oxygen and nitrogen are used to make the oxy-gas mixture in the rotary furnace and for the degassing of the reverberators, respectively.

Oxygen	2019	2020	2021
Consumption (t)	4,050	7,003	6,954
Relative consumption (t/ t)	0.076	0.109	0.102

The specific oxygen consumption has decreased with respect to the data reported in 2020. During 2021 more work was done with the vortex oven than the previous year. This kiln does not use oxygen, unlike the tilting rotary kiln, and this is where the reduction comes from.

Nitrogen	2019	2020	2021
Consumption (t)	1,291	1,347	1,408
Relative consumption (t/ t)	0.024	0.021	0.025

The specific consumption of nitrogen has increased compared to 2020. The actions carried out at the level of improvement of the fusion processes carried out in 2021 have not been effective, mainly due to the fact that it has not been possible to reduce the homogenization times of aluminum per hour to add the alloys.

- **Gasoil**

In Befesa Aluminum, S.L. Diesel oil is mainly used to moisten the chips prior to drying and naturally as a supply to mobile machinery (forklifts, loaders, etc.). Diesel consumption is variable in relation to the degree of humidity of the raw material when it enters the chip dryer.

<b>Gasoil</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
<b>Consumption (GJ)</b>	5,189	4,489	4,030
<b>Relative Consumption (GJ/ t)</b>	0.098	0.070	0.059

Note: the conversion factor for tons of diesel oil to GJ is 43.00. The density of diesel is 0.84 Kg/L.

As can be seen in the table, the specific consumption of diesel in 2021 has fallen widely compared to 2020. The reported data corresponds only to the consumption of diesel associated with the consumption pertaining to mobile machinery, without taking into account that used for drying the chips. Diesel consumption in the dryers was 11,959 GJ in 2021 (0.176 GJ/T treated shavings) and in 2020 it was 10,586 GJ (0.165 GJ/t treated shavings). It can be seen that here there has been a slight increase in consumption.

#### **8.4 Water Consumption**

The Les Franqueses del Vallés plant is supplied with water from two sources: municipal supply and supply from three duly legalized wells. The main uses to which the water is destined are the following:

- Refrigeration and air conditioning: replacement of losses due to evaporation of the cooling towers of the ingot lines, slag cooler and tilting furnace doors, periodic self-cleaning of the sand filters used to regulate the quality of the water in the cooling circuit, osmosis inverse to reduce the conductivity of the supply water and contributions to boiler circuits.
- Sanitary: toilets and services.
- General and equipment cleaning: cleaning with pressurized water.
- Irrigation and fire systems.

Mostly, well water is used for cooling processes in the aluminum ingot manufacturing line. They are recirculated through a closed circuit, in which the water used is cooled and prepared for reuse, through three cooling towers. The percentage of recirculation is, therefore, practically 100% (except for the backwashing of the sand filters parallel to the cooling towers), with the water consumption referenced in the attached table being equivalent to the amount of water evaporated during the cooling processes described above. It is estimated that 90% of the water used in cooling processes evaporates during these operations.

The slag cooler is also a water consumer. The salt slag generated during the production processes is fed to a trommel that, through an external water bath, generates its cooling process. In this case, 100% of the water used in the process evaporates.

For its part, the use of water from the network supply is focused on consumption for offices, restrooms, staff showers, changing rooms, various cleanings and also for the cooling process.

The company has a general meter, meters for the three wells, as well as partial meters distributed throughout the entire plant, which allow knowing the total consumption of water that enters the factory, as well as the partial consumption destined for each one of facilities or uses.

Water	2019	2020	2021
Consumption (m <sup>3</sup> )	35,841	47,253	43,088
Relative Consumption (m <sup>3</sup> / t)	0.67	0.74	0.64

The relative consumption of water during the year 2021 has been significantly lower than the previous year. The use of reject water from osmosis in the installation of the slag cooler is the main cause of this decrease (before it was discharged). In addition, during this year the production of heavier ingots and larger packaging has increased, reducing ingot times.

## 8.5 Waste management

Throughout the year 2020, a total of 31,783 t of hazardous waste and a total of 1,118 t of non-hazardous waste were generated, which represents a total waste of 32,901 t/year. The evolution of the waste generated and managed that is most representative of the activity carried out over the last 3 years is shown in the following table:

Waste managed	2019	2020	2021
<b>Total generation of waste (t)</b>	23,000	33,708	32,901
<b>Relative generation of waste (t / t)</b>	0.43	0.53	0.48
<b>Total generation of hazardous waste (t)</b>	21,766	32,655	31,783
<b>Relative generation of hazardous waste (t / t)</b>	0.41	0.51	0.47
<b>Salt slag produced (t)</b>	20,861	30,443	29,450
<b>Ratio of salt slag to end product (t/ t)</b>	0.393	0.474	0.434
<b>Filter dust produced (t)</b>	888	2,193	2,327
<b>Ratio of filter dust to end product (t/ t)</b>	0.017	0.034	0.034
<b>Aluminium dross produced (t) (*)</b>	5,275	4,700	4,400
<b>Ratio of aluminium dross to end product (t/ t) (*)</b>	0.099	0.073	0.065
<b>Filter bags produced (t)</b>	2.06	3.38	0
<b>Ratio of filter bags to end product (t/ t)</b>	$3.87 \times 10^{-5}$	$5.27 \times 10^{-5}$	0
<b>Uralite generation (t)</b>	-	13.8	5.460
<b>Relative Uralite generation (t/ t)</b>	-	0.0002	0.0001

(\*) Estimated value. It is managed entirely internally.

The specific amounts of filter dust generated are maintained, due to the optimization of the suction system installed throughout the foundry.

Regarding the salt slag, we can say that there is a decrease with respect to the values of the previous year, as a consequence of the metallic performance of the raw materials used and the quality of the flux.

Regarding filter sleeves, their generation has been reduced to zero. It has not been necessary to change the sleeves in any of the existing filters.

## 8.6 Impact on the biodiversity

The total area of our facilities is 20,275 m<sup>2</sup> (total land use), of which 13,307 m<sup>2</sup> are built. Total sealed area equals total land use. The total area in the center naturally oriented is equal to zero, as is the total area outside the center naturally oriented. However, there is no impact on biodiversity, since the land is not included or close enough to have an environmental impact on any protected area. Bearing in mind that the area occupied has not changed in the last 3 years, the relative occupation of land per ton of manufactured product is represented below:

Land area	2019	2020	2021
Relative land area (m <sup>2</sup> / t)	0.25	0.21	0.20

## 8.7 Emission of pollutants into the atmosphere

### 8.7.1 Greenhouse gases (GHGs)

Befesa Aluminum, S.L. Since 2008, it has implemented a global GHG emissions inventory for all 3 centers that make up the aluminum business line (Erandio, Les Franqueses and Bernburg). In it, both direct and indirect emissions are calculated, following the methodology indicated in the ISO 14064 standard. An independent verification report of said inventory is available.

Direct emissions are defined as those associated with those sources that are under the control of society, such as emissions from the combustion process in furnaces, emissions from machinery or vehicles, emissions from process equipment and fugitive emissions from equipment and facilities. Indirect emissions are those

derived from the consumption of electrical energy. The direct and indirect emissions of the last three years are shown in the following table:

GHG emissions	2019	2020	2021
Annual total for direct emissions (t CO <sub>2</sub> eq)	46,377.7	41,513.5	43,559
Relative annual total for direct emissions (t CO <sub>2</sub> eq/ t)	0.2642	0.2381	0.2348
Annual total for indirect emissions (t CO <sub>2</sub> eq)	5,895.2	4,501.6	4,541
Relative annual total for indirect emissions (t CO <sub>2</sub> eq/ t)	0.034	0.026	0.0245

-Data corresponding to the 3 centers of Befesa Aluminum, SL.

### 8.7.2 Emissions of other pollutants into atmosphere

The total emissions of NO<sub>x</sub> and particles, as well as the total emissions of HCl and PCCD/F, corresponding to the last 3 years in absolute and specific values per ton of product manufactured, are shown in the following table. CH<sub>4</sub>, HFC, NF<sub>3</sub>, PFC and SF<sub>6</sub> are not emitted in any of the bulbs:

Emissions of other pollutants	2019	2020	2021
NO <sub>x</sub> emissions (t)	13.32	56.63	31.31
NO <sub>x</sub> relative emissions (kg/ t)	0.25	0.88	0.46
Solid particles emissions (t)	5.88	1.38	1.31

<b>Solid particles relative emissions (kg/ t)</b>	0.11	0.02	0.02
<b>HCl emissions (t)</b>	33	125	3,168
<b>HCl relative emissions (kg/ t)</b>	0.0006	0.0019	0.0467
<b>PCCD/F emissions (ng)</b>	3.19	19.12	28.87
<b>PCCD/F relative emissions (ng/ t)</b>	0.00006	0.00030	0.00043
<b>Cl<sub>2</sub> emissions (Kg)</b>	-	191	4,934
<b>Cl<sub>2</sub> relative emissions (Kg/t)</b>	-	0.003	0.073
<b>COVT emissions (Kg)</b>	8,917	8,010	19,903
<b>COVT relative emissions (Kg/t)</b>	0.17	0.12	0.29
<b>CO emissions (Kg)</b>	2,315	15,961	14,929
<b>CO relative emissions (Kg/t)</b>	0.04	0.25	0.22
<b>SO<sub>2</sub> emissions(Kg)</b>	-	26,509	497
<b>SO<sub>2</sub> relative emissions (Kg/t)</b>	-	0.41	0.01
<b>HF emissions (Kg)</b>	-	118	207
<b>HF relative emissions (Kg/t)</b>	-	0.002	0.003
<b>Hg emissions (Kg)</b>	-	181	0.199

<b>Hg relative emissions (Kg/t)</b>	-	0.002826	0.000003
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## 8.8 Environmental performance regarding legal provisions

### 8.8.1 Emission smokestacks

En las tablas siguientes se recogen los valores medidos durante los últimos años en todos los focos presentes en las instalaciones según la periodicidad establecida en la Autorización Ambiental Integrada, así como su comparativa con los valores límites máximos permitidos.

- **Unified filter in foundry**

Through this source, the purified gases are eliminated from the following facilities:

- **Tilting rotary oven.** Rotary type furnaces use natural gas and oxygen as fuel for the operations of melting the materials and adjusting the process temperatures. The capture systems are constituted in a first step by a cooling system in charge of reducing the temperature of the gases coming from the combustion process. In a second step, the cooled combustion gases are conducted through a bag filter where, in addition to retaining the solid particles in suspension, the acid gas neutralization treatment is carried out by controlled addition of calcium hydroxide.

- **Vortex furnace.** The vortex type furnace is a static melting furnace for melting aluminum shavings with an electromechanical recirculation pump and heated by regenerative burners. These reduce fuel consumption by preheating the combustion air. The generated combustion gases are sent to the unified foundry filter.

- **Holding furnaces.** Tilting reverberatory furnaces also use a mixture of natural gas and oxygen as fuel. The combustion gases produced in the combustion chambers of the tilting furnaces are conveyed to the unified smelter focus.

- **Salt slag cooler.** The cooler consists of a rotating drum or trommel cooled externally by its central area located between two transit layers. The drive is by chain transmission by means of an electric motor-reducer. Water cooling occurs in two cycles, the charge/cooling cycle and the discharge cycle. Both cycles have the aspiration of the fumes that are conveyed to the unified cast iron filter.

Smokestack identification	Number of registration	Contaminant	Limits established in substantial change B1CS160297 and non-substantial change B1CNS180276).	Results of the latest controls carried out by OCA in 2021
Unified filter	NR-024356-P	PST (mg/ m3N):	5	1
		NOx (mg/ m3N):	450	27
		COVT (mg/ m3N):	30	16   29
		CO (mg / m3N):	100	14
		PCCD/F (ng EQT-I/Nm3):	0.1000	0.01
		HCl (mg/ m3N):	30	0.3   5
		HF (mg/ m3N):	1	0.2
		Hg (mg/ m3N):	0.05	0.0013
		Cl2 (mg/ m3N):	1	0.2

- **Turning's dryers and laboratory furnace**

The installation of the dryers is made up of dryer No. 1 and dryer No. 2. The dryers use natural gas and diesel oil as fuel for the drying operations of the materials and for adjusting the process temperatures. The capture systems are constituted in a first step by a cooling system in charge of reducing the temperature of the gases coming from the combustion process. In a second step, the cooled combustion gases are conducted through a bag filter where, in addition to retaining the solid particles in suspension. Add, that the environmental uptake and chip loads is conveyed to the filter of dryer 1, as well as the laboratory ovens.

Smokestack identification	Number of registration	Limits established in substantial change B1CS160297 and non-substantial change B1CNS180276).	Results of the latest controls carried out by OCA in 2021
Turning dryer 1 + air capture dryers + laboratory furnace	NR-05374-P	PST (mg/ m <sup>3</sup> N): 5	1
		COVT (mg/ m <sup>3</sup> N): 30	10
		PCCD/F (ng EQT-I/Nm3): 0.01	0.02
		NO <sub>x</sub> (mg/ m <sup>3</sup> N): 450	5*
		SO <sub>2</sub> (mg/ m <sup>3</sup> N): 180	1.33*
Turning dryer 2	NR-29351-P	PST (mg/ m <sup>3</sup> N): 5	1
		NO <sub>x</sub> (mg/ m <sup>3</sup> N): 450	4.67*
		PCCD/F (ng EQT-I/Nm3): 0.01	0.06
		COVT (mg/ m <sup>3</sup> N): 30	13
		SO <sub>2</sub> (mg/ m <sup>3</sup> N): 180	1.33*

\*Data from 2019 (triennial control frequency)

### 8.8.2 Emissions discharge into the sewer

The plant's water outlets are divided according to their origin as follows:

- Industrial origin

This is the water that comes from two semi-closed cooling circuits (point purges in countercurrent of the cooling tower filters), together with the runoff water collected inside the plant.

- Domestic origin

These are the sanitary waters coming from the offices and changing rooms.

The company has a single discharge point for more sanitary industrial water, which discharges directly into the municipal collector. The global computation of discharge water during the year 2021 reaches the value of 3,561 m<sup>3</sup>.

Befesa Aluminum, S.L. It has a discharge permit, granted by the Consortium for the defense of the Besòs river basin, dated March 4, 2022 and valid until 08/28/2026.

This permit authorizes general discharge limits in the consortium's regulations.

A continuous control of the conductivity of the water in the cooling circuit is carried out, thus ensuring the characteristics of the water discharged in the periodic purges of the circuit. In addition, a monthly analysis of the circuit water is carried out for the microbiological control of Legionella and aerobes.

The following table details the values obtained in the last three control analyzes of wastewater discharges.

Parameters	Limits		Average values of discharge		
			2019	2021	2022
<b>Conductivity at 20°C</b>	8,000 uS/ cm	5,000*	6,110	6,580	4,340
<b>Chlorides</b>	2,500 mg/ L Cl		1,015	150	784
<b>Solid particles</b>	750 mg/ L		34	<10	13
<b>No decanted DQO</b>	1,500 mg/ L O <sub>2</sub>		355	43	34
<b>Decanted DQO</b>	1,500 mg/ L O <sub>2</sub>		277	41	<30
<b>Inhibiting materials</b>	50 Equitox/ m <sup>3</sup>		<2	<2	<2
<b>Total phosphorus</b>	50 mg/ L P		<4.0	<9.2	<4.0
<b>Ammonia</b>	-		29.5	<10	<10.0

\*Limit applicable from 2022.

The reported data correspond to tests carried out by the Anabiol laboratory, with ENAC accreditation. As can be seen, none of the parameters analyzed exceeds the limit values established by the Consortium.

### 8.8.3 Other environmental performance indicators

The company carries out a management aimed at monitoring and periodic control of the noise emissions of its activity transmitted abroad.

With the entire process of furnace replacement, unification of sources in the foundry and construction of the slag treatment plant completed, a regulatory control has been carried out, specifically in March 2022. The report obtained from said control confirms the compliance with current regulations applicable to noise pollution, that is, that the company does not exceed the quality objectives in daytime or nighttime periods established in the applicable Municipal Ordinance, thus also complying with Decree 176/2009.

Environmental noise measurements 2022		
Inmission limit level db(A)	Daytime	Nighttime
	75	65
Point A AMB. EXT. ZONA (C2)	66	58
Point B AMB. EXT. ZONA (C2)	64	53
Inmission limit level db(A) According to Annex A	Daytime	Nighttime
	65	55
Point 1 AMB. EXT. ZONA (B1)	54	-
Point 2 AMB. EXT. ZONA (B1)	58	51
Inmission limit level db(A) According to Annex 3	Nighttime	Nighttime
	50	55
Point 1 AMB. EXT. ZONA (B1) *	50	-
Point 1 AMB. EXT. ZONA (B1) **	-	48

\* Compliance condition b)

\*\*Compliance condition c)

## 9 Environmental targets 2021

In order to comply with the commitment to continuous improvement in environmental action in accordance with what is established in the environmental policy and based on the environmental aspects identified as significant, some environmental objectives are defined for the period 2022, which are as follows:

- To reduce by 2% the emissions of greenhouse gases associated with the production of secondary aluminium.
- To reduce total atmospheric emissions by 2% in chimney.
- To reduce by 2% the total consumption of natural gas used in the activity associated with the company's production processes.
- To reduce by 2% the total consumption of natural gas used in the activity associated with the company's chip treatment processes.
- To reduce by 2% the electricity consumption used during the activity associated with the production processes of the company.
- To reduce by 2% the consumption of diesel used during the activity associated with the production processes of the company.
- To reduce by 2% the oxygen consumption used during the activity associated with the company's production processes.
- To reduce the consumption of flux used by 2% during the activity associated with the company's production processes.
- To reduce by 2% the generation of salt slag generated during the activity associated with the company's production processes.
- To reduce the generation of filter dust by 2%.

## 10. Applicable environmental legislation

Befesa Aluminum, S.L. It is part of sectoral associations that, on a monthly basis, identify, supply and update legal texts. With this information, the new requirements or their modifications are extracted and the own legislative database is updated, with the particular requirements applicable to the company. Likewise, Befesa Aluminum, S.L. performs a continuous verification of compliance with its legal requirements, verifying the non-existence of any non-compliance of an environmental and/or industrial safety nature.

Below is a list of the most relevant applicable environmental legislation:

- Environmental authorization BA2030044, granted on December 1, 2004, by the Department of the Environment and Habitatge of the Generalitat de Catalunya (DMAH) for its non-ferrous metal melting activity with a capacity > 20 t/day of aluminum. The environmental authorization BA2060085, granted on September 22, 2008, incorporating a non-substantial change, in addition to the specific modification of the annex to the AAI BA2030044 with a resolution of April 29, 2008.
- Renewal of the environmental authorization, with number BA20120011 and date December 11, 2012, as well as non-substantial changes authorized with files B1CNS130394 and B1CNS140191. After the favorable resolution for the incorporation of the activated carbon dispenser in focus number 2 (B1CNS140191 and date of July 21, 2014), and the satisfactory results of PCCD/F emissions in it, the resolution with number B1CNS130394 and date of March 10, 2015, for the expansion of waste treatment capacity.

- Substantial change resolution number B1CS160297 dated October 10, 2017, approving the increase in production capacity.
- Resolution of non-substantial change B1CNC180276 dated November 9, 2020, by which the production of non-hazardous waste is increased, two furnaces are replaced, a slag treatment plant is incorporated and the emission sources of contaminants are unified to the foundry atmosphere.
- Resolution of non-substantial change B1CNC200584 dated April 7, 2021, by which an emitting source is eliminated, the capacity of auxiliary raw materials is increased and the production of non-hazardous waste is increased.
- Regulatory regulation of wastewater discharges (Art. 24,26, 29, 38 and 49) for the granting of a discharge permit.
- Royal Decree 252/2006, of March 3, which reviews the recycling and recovery objectives established in Law 11/1997, of April 24, on packaging and packaging waste, and which modifies the Regulation for its execution, approved by Royal Decree 782/1998, of April 30.
- Law 07/2022 on waste and contaminated soil, among others, in relation to matters applicable to companies that produce and manage waste.
- Industrial Safety Legislation (fire-fighting systems, oil installations, high and low voltage, air conditioning, etc.).

- Control of Legionella associated with cooling towers for the manufacture of aluminum ingot.
- European Agreement on the International Carriage of Dangerous Cargo by Land (ADR). The organization has a security adviser, who issues the annual report to the corresponding Department.

## **11 . Cooperation with environmental organizations**

Befesa Aluminum, S.L. belongs to and actively participates in the following associations related to the environment:

- Basque Country Environmental Industry Cluster ACLIMA subscribing to the commitment to sustainable development (1999) and the Biscay declaration on the right to the environment (1999).
- Spanish Association of aluminum recoverers ASERAL.
- Spanish Confederation of metal business organizations Confemetal being an active member of the environment committee.
- European organization of aluminum recoverers EEA.
- Spanish Association of Special Waste Managers ASEGRE: brings together companies in the Spanish state whose activity is the management of hazardous waste.
- AENOR Technical Committee.

Befesa Aluminum, S.L. It regularly participates in R+D+i programs with different research centers and other European companies, fundamentally aimed at improving the recycling, assessment and full use of waste from the aluminum industry.

## 12. Participation

Befesa Aluminio, S.L. enhances the participation of all its workers in the determination of key environmental processes. To do so, it facilitates ways of communicating problems and suggestions for improvement, while at the same time employing the Company Committee established for participation and direct communication with all the members of the company.

## 13. Availability

This environmental declaration is accessible via the corporate website ([www.befesa.es](http://www.befesa.es)).

## 14. Next environmental declaration

This environmental statement is intended to inform employees, authorities, customers, suppliers, the media and neighbors about our management policy and also to propose a constructive dialogue.

It is a public document validated by Bureau Veritas Iberia, S.L., an environmental verifier accredited by ENAC with number ES-V-0003 and with address at Calle Valportillo Primera 22-24 Edificio Caoba- 28108- Alcobendas (Madrid).

The environmental declaration that is now presented is valid for 12 months, presenting the following validated declaration in June 2023.

If you wish to know more details about Befesa Aluminum, S.L. and its products, consult our page [www.befesa.es](http://www.befesa.es). If you would like additional future information, please do not hesitate to contact Mr. Manel Arco Alcaraz at:

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**Glossary:****kg:** kilogram.**Si:** silicon.**Cu:** cooper.**Mg:** magnesium.

mm: millimeters.

**t:** ton.**t CO<sub>2</sub> eq:** CO<sub>2</sub> equivalent tons.**MWh:** megawatt per hour.**m<sup>3</sup>:** cubic meter.**HCl:** hydrochloric acid.**HF:** hydrofluoric acid.**NO<sub>x</sub>:** nitrogen oxides.**SO<sub>2</sub>:** sulphur dioxide.**SST:** solids in suspension.**NH<sub>3</sub>:** ammonia.**Zn:** zinc.**Fe:** iron.**g:** gram.**NaCl:** sodium chloride.**KCl:** potassium chloride.**cm<sup>2</sup>:** square centimeter.**h:** hour.**kW:** kilowatt.**V:** volt.**R&D:** research and development.**m<sup>2</sup>:** square meter.**GHG:** greenhouse gases.**mg/ Nm<sup>3</sup>:** milligram per normal cubic meter.**Pb:** lead.**Cr:** chromium.**Mn:** manganese.**Ni:** nickel.**As:** arsenic.**Cd:** cadmium.**Hg:** mercury.