

ENVIRONMENTAL STATEMENT

2023

**Integral Recycling of Aluminum Waste, Slags, Salt Slags,
Scrap and Spent Pot Lining (SPL).**

BEFESA

Validation of results 2023 EMAS

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1. Description of the organization and the integrated management system

1.1. Description of Befesa as a group.

Befesa is a service company specialized in the recycling of steel dust, salt slag and aluminum waste, as well as logistics and other related industrial services. It offers environmental services specialized in the integral management of industrial waste from the steel and aluminum industries. Its activity is divided into two business units: Steel Dust Recycling Services and Aluminum Salt Slag Recycling Services.



Servicios de reciclaje de polvo de acería



Servicios de reciclaje de escorias salinas de aluminio

Befesa Servicios de Reciclaje de Escorias Salinas de Aluminio is divided into three services that carry out different but highly complementary activities:

- Recycling services for salt slags, Spent Pot Lining (SPL), used refractories, and other wastes.
- Second-melt aluminum alloy processing services from scrap and metal-containing wastes to produce customized alloys
- Technology and sale of specialized machinery.

ALUMINUM SALT SLAG RECYCLING SERVICES		
Salt slag recycling and SPL services	Secondary aluminum recycling services	Technology and machinery
<ul style="list-style-type: none">•Befesa Aluminum (Valladolid Plant)•Befesa Salzschlacke (Hannover Plant)•Befesa Salzchacke (Lünen Plant)	<ul style="list-style-type: none">•Befesa Aluminio (Erandio Plant)•Befesa Aluminum (Plant Barcelona)•Befesa Aluminium Germany (Bernburg Plant)	

This report will analyze all the environmental information of the Valladolid TC.

1.2. Description of the organization and its activities, products and services.

Our work center, Befesa Aluminio CT Valladolid (CNAE-38.32), has as its scope the "Recycling, recovery and valorization of waste from primary and secondary aluminum production".

From the reception of industrial waste, through storage and subsequent treatment, the minimization of the possible environmental effects or impacts that our process could generate is taken into account at all times.

We are located in the municipality of Valladolid. Specifically, our facility is located about 5 km from the urban center of Valladolid, occupying an approximate area of 106,700 m².

Befesa Aluminio CT Valladolid's recycling and valorization processes have been considered as Best Available Technologies (BAT) within the European Commission's BREF (Best Available Techniques Reference) documents for non-ferrous metallurgy.

Befesa Aluminio CT Valladolid's activities are divided into four processes, which are described below:

Process 1: Obtaining aluminum concentrates by physicochemical treatment.

The recycling process operated by Befesa Aluminio CT Valladolid allows the recovery of free metal and fluxing salts and the formation of inert products, mainly composed of aluminum oxide.

The process consists of a mechanical treatment of crushing and separation of metals, reaction of the hazardous components and aqueous dissolution of the salts, filtering of the inertized material and subsequent crystallization of the salts.

The phases of the production process are:

Milling: The purpose of this treatment is, on the one hand, to extract the metallic aluminum and, on the other hand, to reduce the particle size in order to achieve a perfect reaction of the aluminum with the aluminum.

reactive components, and the dissolution of the salts contained therein.

It consists of breaking, by means of a hydraulic hammer, the large blocks, which are then passed to a mill that allows the entry of a maximum block size of 750 kg. Once the material is crushed, it passes through a screen, where a first product (aluminum concentrate) is obtained. The rest is reduced to powder and sent to the next stage.



Dissolution-Reaction: The material (powder) obtained from grinding or received already ground is mixed with water to dissolve the salts. The dissolution is carried out with a part of the

condensates from crystallization and with the filtrate from the alumina concentrate.

The mixture is pumped to reactors where the aluminous compounds react by maintaining the temperature. The gases produced in the reactors are incinerated in the flare.

The pulp is sent to decanters that will separate the insoluble oxides from the brine by adding a flocculant. The reacted oxides are washed in belt filters. The filtrate water is recirculated for reuse.

The cakes obtained are sent to the final product warehouse, obtaining the product "Paval", which is used in ceramic and refractory products, rock wool, etc.

The brine obtained is purified in a clarifier before passing to the next stage.



Drying: El Paval can be dried using a rotary dryer and/or natural drying. At the end of 2020, a new rotary dryer was installed as a result of the publication in October 2020 of the new integrated environmental authorization, which includes the non-substantial modification No. 17 for adaptation to the best available techniques and whose start-up will take place in 2021.

During 2022, the collection system in the turkey storage shed was expanded and modified by installing two adjacent bells and modifying the existing one (MNS No. 19).



Crystallization: To separate the salts from the water contained in the brine obtained in the previous phase, the vapors are evaporated and then condensed. From this The result is a salt, a mixture of NaCl and KCl, and condensates that are reused in the process.

A natural gas boiler is used for steam production.



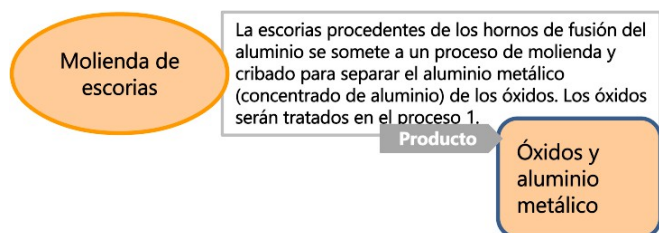
Gas scrubbing: The air with NH_3 , coming from the drying process, as well as that coming from the extraction of the production hall, is conducted to the gas scrubbers in the The latter is purified by washing with H_2SO_4 , obtaining $(\text{NH}_4)_2\text{SO}_4$.



Process 2: Milling and segregation of aluminum slag.

The slag from the aluminum smelting furnaces is subjected to a grinding and screening process to separate the metallic aluminum (aluminum concentrates) from the oxides, which are treated in process 1.

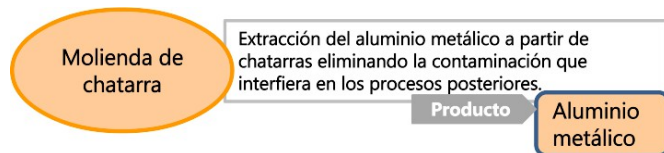
During 2023 this facility has only been used on an ad hoc basis.



Process 3: Milling and segregation of aluminum scrap.

The purpose of this treatment is the separation of the metallic aluminum contained in aluminum scrap.

Installation in disuse.



Process 4: Storage of waste that is not subject to treatment.

The value of 134,080 tons processed of Salt Slag together with the Spent Pot Lining (SPL), will be quoted in the text as **(t processed)**, this will be the data used as **CIFRA B**, for the calculation of factors such as: Waste, Emissions, Consumption and Land Use, therefore, it will be used for all EMAS indicators.

The reason for using this data is its representativeness, since the energy consumption, waste generated and emissions produced will depend on the tons of hazardous waste processed in the plant, since it is directly proportional.

The list of raw materials treated in tons for the last three years is as follows:

Treated material (t)	LER Code	2021	2022	2023
Salt slags (P1)	100.308	133.505	142.209	123.668
SPL (P1)	161.101/161.103	11.103	15.747	10.412
Aluminum dross powder (P1)	100.321	0	0	0
Filter dust (P1)	100.319	0	0	0
Foundry sands (P1)	101.106	0	0	0
Aluminum scrap (P4)	120.103 160.118 191.203	128	506	0
Aluminum slag (P2)	100.304	65	0	0
Totals		144.801	158.462	134.080
Note: P=process				

The list of products obtained in tons for the last three years is as follows:

Product obtained (t and %*)	2021	2022	2023
Salt	41.989 (29%)	43.347 (27%)	40.626 (33%)
Paval	113.048 (78%)	117.756 (74%)	117.876 (88%)
Aluminum concentrate	11.993 (8%)	13.311 (8%)	11.479 (9,28%)
Ammonium sulfate	10.661 (7%)	12.113 (8%)	12.811 (9,5%)
Totals	177.691	186.527	182.793

*Comparison with the total amount of material treated in the corresponding year.

The total sum of percentages is greater than 100% due to humidity and generation of new materials (hydrated oxides, etc.).

1.3. Description of the Integrated Management System.

Befesa Aluminio CT Valladolid has an Integrated Environmental Management System (SIGMA), certified by Bureau Veritas according to the requirements of the UNE-EN ISO 14001:2015 standard and European Regulation No. 1221/2009 (EMAS) updated by Regulation (EU) 2017/1505 and Regulation (EU) 2018/2026, which is the tool used to implement and put the Environmental Policy into practice, and which enables it to internally manage environmental aspects, as well as to define its environmental objectives.

The SIGMA documentation provides an understanding of the organization, roles and responsibilities within Befesa Aluminio CT Valladolid. There is a Management Manual that describes the interrelationships of the SIGMA elements, documents key roles and responsibilities and provides guidance on reference documentation. The manual provides an overview of management and describes the basic requirements of the system. These requirements are developed through procedures, instructions and specifications for all activities that require them.

The company's management defines an integrated policy for Befesa División Escorias Salinas based on health and safety, quality, environment and energy efficiency in which it formally describes the guidelines and commitments adopted by Befesa.

This policy is reviewed periodically based on changes in the organization, legislation, stakeholders, etc.

The last review and modification of the policy was in October 2021.

P-IMS - Befesa División Escorias Salinas Integrated Policy Date**18/10/2021****Rev: 08**

As a leading organization in the recycling and recovery of waste from the primary and secondary aluminum industry, Befesa División Escorias Salinas, which includes its recycling plants in Valladolid (Spain), Lünen and Hannover (Germany), focuses its activity on the pursuit of excellence through safe, efficient and effective management that contributes to sustainable development.

The Management of Befesa División Escorias Salinas is aware that the key factor for the success of its operations is the satisfaction of all relevant stakeholders (customers, direct and indirect employees (contractors and subcontractors), authorities and legislators, social environment, etc.) and in accordance with this, adopts the following policy that establishes the following commitments:

1. Commitment to health and safety, prevention of occupational hazards and

improvement of working conditions: Befesa División Escorias Salinas ensures safety.

and occupational health of all personnel (direct and indirect employees) through compliance with legal and other requirements applicable to the safety and health of workers, implementing improvements to eradicate unsafe acts and conditions and eliminating risks, through a zero accident policy, with employee participation being an essential element in the prevention of occupational risks and the promotion of health. To this end, Befesa has implemented an occupational health and safety management system that complies with the requirements of ISO 45001:2018.

2. Commitment to an appropriate work environment, equal opportunities in the workplace, development of skills and reconciliation of family and work life:

Befesa

The Escorias Salinas Division promotes equal opportunities and training to increase the skills of its workers, and fosters a climate of trust by complying with the rules, analyzing the needs and expectations of workers and establishing the highest standards in labor relations, based on integrity, responsibility and loyalty. Befesa has an internal sick leave management procedure in place to eliminate the causes of non-attendance at work and guarantee the right to active work of all employees.

3. Commitment to the quality of products and services: Befesa División Escorias Salinas is committed to offering its customers products and services with the required quality, focused on continuous improvement, in accordance with the company's strategic objectives, taking into account the context of the organization and the needs and expectations of customers, assessing risks and implementing actions to eliminate or reduce them. For this reason, Befesa has implemented a quality management system certified in accordance with ISO 9001:2015.

4. Commitment to the protection and defense of the environment: Befesa Slag Division Salinas is committed to preventing pollution and preserving the environment, complying with current legislation and other commitments that Befesa may subscribe to, in accordance with the context of the organization and considering its activities, products and services throughout their life cycle. Therefore, it maintains a system of identification, evaluation and reduction of environmental impacts, promoting rational use of natural resources and reduction in waste generation, circular economy, reduction of GHG emissions and continuous improvement. Thus, Befesa has implemented an environmental management system based on ISO 14001:2015 and calculates and evaluates its carbon footprint according to ISO 14064.

5. Commitment to energy efficiency and energy management: Befesa División Escorias Salinas is aware of the importance of efficient energy management, maintaining a maximum efficiency target. Therefore, Befesa maintains an energy efficiency management system that ensures the continuous improvement of energy performance, including energy efficiency, energy use and energy consumption, establishing continuous improvement objectives, ensuring the availability of information and resources necessary to achieve them, integrating energy performance in strategic decisions and complying with legal requirements and other requirements associated with energy and efficiency. Likewise, Befesa Escorias Salinas promotes the acquisition of energy efficient products and services. This behavior is endorsed by the ISO 50001:2018 certification.

6. Commitment to confidentiality and protection and treatment of information

Befesa División Escorias Salinas, on the basis of the confidential nature of the information, promotes the security of the data legally protected.

and the proper use of IT tools, complying with the guidelines established by the Befesa Group, promoting rationalization, optimization and

simplification of IT management, as well as continuous improvement of the effectiveness and efficiency of information systems.

7. Legal commitment, risk reduction and continuous improvement: Befesa División Escorias Salinas is committed to complying with legal and other subscribed requirements, the

identification, evaluation and elimination or reduction of identified risks, prevention of negative effects, continuous improvement, transparency, consideration of the needs and expectations of relevant stakeholders, taking into account the context and nature of the organization in establishing its strategy.

The Management of Befesa División Escorias Salinas will ensure that this policy is maintained and applied and that it is understood and accepted by all interested parties.

This policy will be distributed to all employees and explained directly.

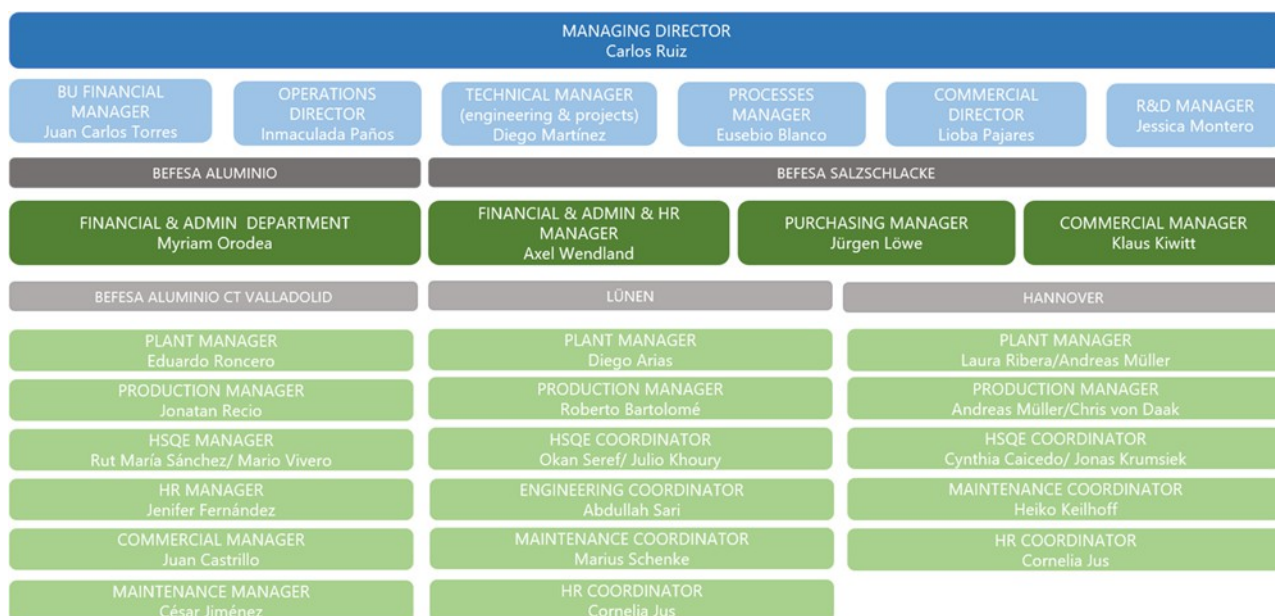
This policy will be made available to any interested party upon request.



Carlos Ruiz de Veye, General Manager

Valladolid/ Hannover/ Lünen, October 2021.

For the development of the activities related to the Integrated Environmental Management System, the Valladolid work center has the necessary human resources, which are expressly defined in the organization chart.



3. Environmental aspects.

3.1. Evaluation methodology:

Befesa determines all direct and indirect environmental aspects that have a positive or negative impact on the environment, as well as which of these aspects are significant based on the established criteria.

Therefore, the identification of environmental aspects has taken into account the direct and indirect aspects of the activities, products and services, taking into account the DNSH Principles and European Taxonomy, the different stages of the life cycle that includes the contracting of treatment services, reception, production, transport and use of the products obtained.

Direct environmental aspects are associated with Befesa's activities, products and services over which the company exercises direct management control.

These aspects include:

- Atmospheric emissions
- Discharges to water, including infiltration to groundwater
- Generation, recycling, reuse, transportation and disposal of hazardous and non-hazardous waste
- Land use and contamination
- Energy use
- Use of additives and auxiliaries
- Local problems (noise, vibrations, odors, dust, visual appearance)

Indirect environmental aspects are the result of the interaction between the company and third parties and which can be influenced to a reasonable degree. These aspects include:

- Life cycle issues that can be influenced by the organization
- Investments
- New markets
- Environmental performance and practices of contractors and suppliers

In assessing the significance of the aspects, the following are taken into account:

- Relevant applicable legislation and internal requirements.
- Damage or benefits to the environment, including biodiversity
- Damages or benefits for the company.
- Environmental situation
- Severity, frequency and reversibility of the aspect or impact
- Stakeholder interest/complaints

On these criteria, in the evaluation of the significance of the aspects, scores are assigned to determine those that are significant. For this purpose, the following are taken into account:

- Existing data on material and energy consumption, discharges, wastes and emissions in terms of risks
- Activities regulated by environmental legislation
- Recruitment activities
- Activities with the most significant environmental costs and benefits.

In addition, consideration is given to normal operating conditions, start-up and shutdown (abnormal) conditions and reasonably foreseeable emergency conditions, past, present and future, as well as investigations of previous incidents or accidents.

3.2. Significant environmental aspects.

Befesa takes into account the direct and indirect environmental aspects of its activities, products and services, including those derived from new projects, emergency situations or abnormal operating conditions that may have an impact on the surrounding environment.

In addition, in accordance with the provisions of the new ISO 14001:2015 standard, European Regulation 2017/1505 amending Annexes I, II and III of European Regulation No. 1221/2009 (EMAS), and Regulation (EU) 2018/2026 amending Annex IV of Regulation (EC) No. 1221/2009, for each of the aspects identified, the changes that may occur in the environment from a life cycle perspective (environmental impacts) are determined.

Befesa considers its significant environmental aspects in the planning of its Integrated Environmental Management System and in the definition of its environmental objectives and targets:

Positive direct and indirect environmental aspects considered **significant** under normal conditions: Derived from:

Aspect Assessment 2023

Process	Activity	Environmental aspects significant	Environmental impact	Remarks
Strategic management	Contracting service of treatment	Dumping of RTPs	Water/soil contamination	Befesa CT Valladolid's activity consists of providing sustainable solutions to the primary and secondary aluminum industry by servicing and recycling the hazardous waste generated.
Strategic management	Recycled product generation: paval	Consumption of raw materials	Resource depletion	Befesa CT Valladolid closes the circle of natural resource protection by collecting hazardous industrial waste, recycling it and then reintroducing valuable materials into the production process (salt, paval, aluminum and ammonium sulfate). Befesa has been part of the circular economy for more than three decades.
Strategic management	Generation of recycled product: salt	Consumption of raw materials	Resource depletion	
Strategic management	Generation of recycled product: aluminum	Consumption of raw materials	Resource depletion	
Strategic management	Generation of recycled product: ammonium sulfate	Consumption of raw materials	Resource depletion	
Financial	Contracting environmental liability insurance and extended liability bonds	Environmental responsibility of company's environmental	Soil/water/atmosphere contamination	Befesa CT Valladolid has an environmental liability insurance policy that covers the liabilities derived from its activity.

Direct negative environmental aspects that are considered **significant** under normal conditions: From:

Environmental Aspect Assessment 2023

Process	Zone from m plant/area	Activity	Environmental aspects significant	Environmental impact	Shares
Production (RTD)	Grinding	Phase 1: Milling	Electricity consumption	Resource depletion, Greenhouse Gas (GHG) emissions	ISO 50001 certification and establishment of energy efficiency measures Target 2023 and 2024.
Production (RTD)	Plant	Phase II: dissolution/reaction/decantation; Phase III: filtration/product storage transport, Phase IV: crystallization, Phase VI: gas scrubbing, Loads in transport medium product 3: salt, Raw material and process control (lab), Offices 2 (with locker rooms), Development of pilot plants, workshops, scheduled shutdowns, projects: execution of works	Water consumption	Resource depletion (drought), Greenhouse Gas (GHG) emissions	Reuse of process water and rainwater Target 2023 and 2024.
Production (RTD)	Dissolution	Phase II: dissolution/reaction/decantation, Phase III: filtration/transport/storage of product	Electricity consumption	Resource depletion, Greenhouse Gas (GHG) emissions	ISO 50001 certification and establishment of energy efficiency measures Target 2023 and 2024.
Production (RTD)	Crystallization	Phase IV: crystallization	Electricity consumption	Resource depletion, Greenhouse Gas (GHG) emissions	ISO 50001 certification and establishment of energy efficiency measures Target 2023 and 2024.
Production (RTD)	Crystallization	Phase IV: crystallization	Gas consumption	Resource depletion	Study of materials to increase the useful life of filter fabrics.
Production (RTD)	Gas scrubbing	Phase VI: gas scrubbing	Electricity consumption	Resource depletion, Greenhouse Gas (GHG) emissions	Certification to ISO 50001 and establishment of energy efficiency measures Target 2023 and 2024

4. Program objectives and goals.

On an annual basis, objectives and goals are established based on the identification and evaluation of environmental aspects and impacts.

The evolution of the actions planned and the degree of compliance with the established objectives are reviewed on a monthly basis.

4.1. Summary of objectives and goals 2022-2023.

The following objectives were established for the 2022 fiscal year, the results of which could be quantified during 2023:

- **Environmental aspect: generation of non-hazardous waste**

5% reduction in filter maintenance waste (press and belt) by extending the life of the belt filter cloths. Internal code: 2023-HSQE/ MAI-Other-1		Associated indicator: t filter fabrics produced	Value: Annual target: 14.38t Base value: 15.40t
Goals	Responsible	Deadline	Media
M1.-Searching for alternative fabrics for band filters M2.-Quarterly monitoring of the indicator	Quality, Environment and Prevention /Maintenance	December 2023	NA

The number of filter fabric suppliers has been expanded, with positive results, expanding the supplier portfolio and the type of filter used.

Only generating **8.96 t** in 2023 compared to **15.40 t** in 2022.

A 40% reduction in waste has been achieved for the materials of the new fabrics.

Objective achieved

- **Environmental aspect: water consumption**

Maintain 2022 water consumption, despite an increase in water-consuming equipment, through new process water reuse systems- Internal Code: 2023-RTD-RO-1		Associated indicator: m ³ /t processed	Value Annual target: 0.96 m ³ /t processed Base value: 0.96 m ³ /t processed baseline: 0,96 m ³ /t processed
Goals	Responsible	Deadline	Media
M1.-Study and monitoring of water collected at the plant. M2.-Action plan for modifications.	Production	December 2023	4.000€

Water consumption has been slightly above the annual target with **1.13 m³ /t processed**, due to the following factors: Low process densities due to the low salt content of the salt slag, sulfate recovery in the gas treatment plant for the generation of a new product.

The generalized drought situation experienced throughout the country has also meant that rainwater cannot be used.

A water consumption target will be worked on again by 2023/2024.

Objective NOT met.

- **Environmental aspect: electricity consumption**

Maintain electricity consumption, despite increasing consumers, by optimizing equipment, processes and plant uses. -Internal code: 2023-RTD-RO-2		Associated indicator: kWh/t processed	Annual target value: 92 Kw/t processed Base value: 92.22 Kw/t processed
Goals	Responsible	Deadline	Media
M.1.- Review of each area of the plant to identify non-optimized points (changes in the process, inadequate habits, etc.). M.2.- Action plan for reduction of electricity consumption and tracking	Production	December 2023	200.000€

We have deviated from the target, remaining at **107 Kw/t processed** since we have not been able to obtain the expected production ratios and these are directly linked to this consumption.

The change in the nature of the salt slag by the secondary aluminum smelters means that the operation of the mills is not as productive as it is when the material introduced is coarser, lowering their productivity and leading to an increase in the plant's energy consumption.

Objective NOT met

- **Environmental aspect: electricity consumption**

Maintain 2022 consumption by optimizing the evaporation plant to work with all crystallizers at the same time. - Internal code: 2023-EE-OTHER-2		Associated indicator: kWh/t processed	Annual target value: 32Kwh/ton processed Baseline value: 32Kwh/ton processed baseline: 32Kwh/t processed
Goals	Responsible	Deadline	Media
Goal 1: Study by a specialized company Goal 2: Modification of first stage working conditions Goal 3: Study and removal, if necessary, of insoluble impurities in the brine (carbonates, etc.).	Energy Efficiency	December 2023	5.000€

Slightly above target, **37.57 kW/h / ton processed**, maintaining the same trend throughout the year. Weighed down by low densities and low yields.

This is due to the change in the nature of the material processed in the plant, which is also being worked on.

A new target for electricity consumption will be set for 2023/2024.

Objective NOT met

- **Environmental aspect: GHG.**

Improve greenhouse gas (GHG) reporting - Internal Code: 2023- GHG-1		Associated indicator: NA	Target value annual: NA
Goals	Responsible	Deadline	Media
M1.- Include indirect emissions in the evaluation of environmental aspects. M2.- Search for new sources of information to reduce the uncertainty of the associated data. M3.- Improve the data collection system. M4.- Modify the materiality assessment procedure to improve the reporting of indirect emissions. M5.- Integrate the inventory with the rest of the slag plants. salinas to conduct joint internal and external audits.	Quality, Environment and Prevention	August 2023	2.000€

Indirect emissions have been included in the EAA, and corporate works periodically to update them so that they are as representative as possible in all the group's plants.

We are working with the Lünen, Hanover and Valladolid plants to use all the bibliography published by the public administrations of Germany and Spain, in addition to all the documentation provided by Befesa Corporativo, so that the Emission Factors used are always the most up to date. The system of

Data collection is simplified as data is reported quarterly to Befesa Corporate and the Integrated Management System is kept up to date with the GHG folder. ISO 14,064 has been integrated with the 3 Salt Slags plants of the Division.

Objective achieved

4.2. Summary of objectives and goals 2024.

After reviewing and analyzing the results of the 2023 fiscal year, taking into account the significant environmental aspects and analyzing our business unit risks and opportunities, the following objectives for 2024 are formulated.

- Environmental aspect: generation of non-hazardous waste**

10% reduction of MSW (Urban Solid Waste) Internal code: HSQE-2024-2023-RO-OBJ-3		Associated indicator: Tons sent to MSW	Value Annual target: 10% reduction in T sent to MSW Base value: 7.3t
Goals	Responsible	Deadline	Media
M1.-Implementation of waste segregation points in Offices 1 and 2 + Lab + canteens. M2.-Decrease in MSW managed and shipped in DS Smith M3.- Collective waste reduction campaigns: Earth Day, Recycling Day, Environment Day, Ecological Week, etc.	Quality, Environment and Prevention	December 2024	NA

- Environmental aspect: water consumption**

Reduce the environmental impact of the process through better management of condensate water consumption in the process to reduce annual raw water consumption. Internal code RTD-2024-2023-RO-OBJ-4		Associated indicator: m³ / ton processed	Annual target value: 2% reduction in water consumption with respect to 2023 Value basis: 1,13 m³ /t³ processed
Goals	Responsible	Deadline	Media
M1.- To carry out the works of adequacy of the zone to be able to collect separately these waters and to be able to reuse them in the same point. The works consist of the installation of a deposit to collect the overflows of the pots, a pump to recirculate the water and a point of addition of new water to compensate the losses of level of the circuit that are had by evaporation.	Production	December 2024	NA

- Environmental aspect: energy consumption

Reduction of compressed air consumption in plant by 2% per ton processed Internal code: EE-2024-RO-OBJ-1		Associated indicator: kWh/t processed	Annual target value: 2% reduction in consumption of AC about 2023 Value Base: 6.39 kW/ t processed
Goals	Responsible	Deadline	Media
M1.- Leakage analysis M2.-Sleeve filter blowing time reduction.	Energy Efficiency	December 2024	1350€

Reduction of natural gas consumption by 2% per ton processed Internal code: EE-2024-RO-OBJ-2		Associated indicator: kWh/t processed	Annual target value: 2% reduction in NG consumption NG about 2023 Value Base: 4.14 kW/ t processed
Goals	Responsible	Deadline	Media
M1.- Energy use of generator plant gases to produce steam: Development of gas recovery and NG replacement projects. M2.- control and monitoring of crystallization consumption per tn processed.	Energy Efficiency	December 2024	NA

Improvement of EE in plant. Internal code EE-2024-2023-SP-2 (2% reduction in consumption with respect to 2023).		Associated indicator: kWh/t processed	Annual target value: Reduction 2% consumption with respect to 2023 Base value: Electricity consumption electricity consumption discounting electricity from contracts (kw/t on processed) 107.92 kW/ t processed.
Goals	Responsible	Deadline	Media
M1.- Change in plant lighting management M2.- Modification of street lighting. M3.- Modification of lighting in offices and common rooms.	Energy Efficiency	December 2024	NA

5. Befesa's environmental performance.

The following section reflects the company's environmental performance.

All indicators presented below are represented in absolute and relative ratios (per ton of total raw material processed).

5.1 Atmospheric emissions.

The designation of the hotspots changes in 2021 after the entry into force of the new integrated environmental authorization. In 2022 a new focus is added, No. 10, as a consequence of MNS No. 19 of the AAI.

There are 10 emission sources, listed below.

- Focus No. 1: boiler A.
- Focus No. 2: Boiler B.
- Focus no. 3-6: Belt filter extraction-Rotary dryer-Scrubber
- Focus no. 4: torch conduit
- Focus No. 5: extraction of salt slag milling baghouse.
- Focus No. 7: extraction filter grinding of aluminum slag
- Focus No. 8: Sampling furnaces.
- Focus No. 9: scrap milling
- Focus #10: Diffuse ammonia emissions

Befesa Aluminio CT Valladolid complies with Royal Decree 100/ 2011, of January 28, which updates the catalog of activities that potentially pollute the atmosphere and establishes the basic provisions for its application. The installation, layout and dimensions of connections and accesses are adequate for measurements and sampling. The results of the last inspection are entirely within the authorized limits of the current regulations.

The following are the results of the emission measurements taken during the year 2023, in addition to the emission limit values of the sources established in our AAI (Integrated Environmental Authorization). As part of Befesa Aluminio, SL CT Valladolid's self-monitoring system, more measurements are taken than strictly required in the AAI. The data presented are the average of the measurements taken in 2023, and none of them exceeded the limits reflected in the AAI in force at that time.

- **Focus No. 1: Boiler A.** This boiler is the one used under normal operating conditions.



Parameter evaluated	2020	2021	2022	2023	VLE
CO mg/ Nm ³	<6,50	3,67	N/A* N/A	5,15	100
CO kg/ t	4,77*10 ⁻⁵	2,53*10 ⁻⁵	N/A* N/A	3,84099*10 ⁻⁵	N/ A
NO _x mg/ Nm ³ expressed as NO ₂	167,50	178,04	N/A* N/A	81	200
NO _x kg/ t expressed in NO ₂	0,001	0,001	N/A* N/A	0,00060	N/ A

*Biennial periodicity according to AAI

- **Focus no. 2: boiler B.** Occasional use (maintenance operations or breakdowns of boiler A).

Parameter evaluated	2020	2021	2022	2023	VLE
CO mg/ Nm ³	<7,5	3,9	N/A* N/A	4,13	100
CO kg/ t	5,51*10 ⁻⁵	2,69*10 ⁻⁵	N/A* N/A	3,08025E-05	N/ A
NOx mg/ Nm ³ (expressed as NO ₂)	68	98,66	N/A* N/A	146,3	200
NOx kg/ t expressed as NO ₂	4,99*10 ⁻⁴	6,81*10 ⁻⁴	N/A* N/A	0,00109114	N/ A

*Biennial periodicity according to AAI

- **Focus no. 3-6: Belt filter extraction-Rotary dryer-Scrubber**

Parameter evaluated	2020	2021	2022	2023	VLE
HCl mg/ Nm ³	<0,1	0,10	0,10	0,19	230
HCl kg/ t	7,34*10 ⁻⁷	7,35*10 ⁻⁷	6,31*10 ⁻⁷	1,44*10 ⁻⁶	N/ A
NH ₃ mg/ Nm ³	9,70	0,4925	0,058	0,227	10
NH ₃ kg/ t	7,12*10 ⁻⁵	3,42*10 ⁻⁶	3,66*10 ⁻⁷	1,69*10 ⁻⁶	N/ A
PH ₃ mg/ Nm ³	N/ A	0,024	0,023	0,024	0,5
PH ₃ kg/ t	N/ A	1,70*10 ⁻⁷	1,45*10 ⁻⁷	1,78*10 ⁻⁷	N/ A
SH ₂ mg/ Nm ³	N/ A	0,21	0,18	0,183	2
SH ₂ kg/ t	N/ A	1,45*10 ⁻⁶	1,13*10 ⁻⁶	1,36*10 ⁻⁶	N/ A
Particles mg/ Nm ³	-	0,97	0,71	0,04	5
Particulates kg/ t	N/A	6,70*10 ⁻⁶	4,48*10 ⁻⁶	3,20*10 ⁻⁷	N/ A

- **Focus no. 4: Torch**

No measurements are taken as this is not a requirement of the integrated environmental authorization.

- **Focus No. 5:** baghouse extraction and salt slag grinding.



Parameter evaluated	2020	2021	2022	2023	VLE
Particulates, (PM ₁₀) mg/ Nm ³	<1	0,66	0,45	0,36	5
Particulates, (PM ₁₀) kg/ t processed	7,34*10 ⁻⁶	4,56*10 ⁻⁶	2,83*10 ⁻⁶	2,68*10 ⁻⁶	N/ A

- **Focus No. 7:** Aluminum slag milling filter extraction.



Parameter evaluated	2020	2021	2022	2023	VLE
Particulate matter, (PM ₁₀) mg/ Nm ³	<1	N/A	1,47	0,50	5
Particulates, (PM ₁₀) kg/ t processed	7,34*10 ⁻⁶	N/A	9,27*10 ⁻⁶	3,72*10 ⁻⁶	N/A

In 2021 the facility has been idle.

- **Focus No. 8:** Sampling furnace.



Parameter evaluated	2020	2021	2022	2023	VLE
Particulate matter, (PM ₁₀) mg/ Nm ³	<1	1,55	<0,59	3,27	5
Particulates, (PM ₁₀) kg/ t processed	7,34*10 ⁻⁶	1,07*10 ⁻⁵	3,723*10 ⁻⁶	2,43*10 ⁻⁵	N/ A

- **Focus No. 9:** extraction and milling of aluminum scrap.

During 2022 and 2023, no measurements were taken of the emissions from focus No. 9 of the scrap grinding extraction due to the fact that the facility has not been used, and this situation has already been communicated.

- **Focus #10:** Diffuse ammonia emissions

Parameter evaluated	2020	2021	2022	2023	VLE
Point average (NH3) mg/ Nm3	-	-	0,091	0,109	10
Average of the points (NH3) kg/ t processed	-	-	5,76*10 ⁻³	8,15*10 ⁻⁷	NA

The air with NH3, coming from the drying process of the Paval, as well as the air coming from the extraction of the production plant, is conducted to the three washing towers where it will be purified by washing with sulfuric acid H2SO4.

Test performed and results obtained for diffuse emissions of pollutants to the atmosphere (NH3) by passive samplers.

The data in the table show the average of the results of the three sampling points of the report, all of them, individually, being within the established limits.

In 2023, measurements have been made on a quarterly basis.



Total channeled emissions in 2023 of CO, NO_x, Cl⁻, NH₃, SO₂ and PM have been as follows.

Parameter evaluated	2020	2021	2022	2023
Particulates, (PM₁₀) kg	402	716	1035	443,76
Particulates, (PM₁₀) kg/ t processed	0,003	0,005	0,007	0,003
NO₂ kg	4.466	4.795	4.576	2.774
NO₂ kg/ t processed	0,033	0,033	0,029	0,020
CO kg	160	99	94	176
CO kg/ t processed	0,001	0,0007	0,0006	0,0013
Cl⁻ kg	22	60	95	141
Cl⁻ kg/ t processed	1,61*10 ⁻⁴	4,14*10 ⁻⁴	5,99*10 ⁻⁴	0,00105
NH₃ kg	2194	261	55	165
NH₃ kg/ t processed	0,016	0,002	0,0003	0,0012
SO₂ kg	498	0	0	133,3
SO₂ kg/ t processed	0,004	0	0	0,00099

In relation to annual greenhouse gas emissions, Befesa Aluminio S.L CT Valladolid's direct emissions (Scope 1) and indirect emissions from energy (Scope 2) totaled

- **16,963.42t CO₂ eq**
- **0.104 t CO₂ eq/t processed**

Annual emissions of each type of greenhouse gas in 2023 are as follows:

Emissions gas effect greenhouse	2020	2021	2022	2023
CO ₂ (t of CO ₂ equiv.)	16.569	16.781	16.409	13.767
CO ₂ (t of CO ₂ equiv./ t processed)	0,114	0,115	0,103	0,127
CH ₄ (t of CO ₂ equiv.)	7,10	7,39	6,25	6,61
CH ₄ (t of CO ₂ equiv./ t processed)	5,21*10 ⁻⁵	5,10*10 ⁻⁵	3,95*10 ⁻⁵	4,93*10 ⁻⁵
N ₂ O (t of CO ₂ equiv.)	9,64	9,59	8,31	9,05
N ₂ O (t of CO ₂ equiv./ t processed)	7,08*10 ⁻⁵	6,62*10 ⁻⁵	5,24*10 ⁻⁵	6,75*10 ⁻⁵
HFCs (t CO ₂ equiv.)	0	0	0	0
HFCs (t CO ₂ equiv./ t processed)	0	0	0	0
SF ₆ (t of CO ₂ equiv.)	0	0	0	0
SF ₆ (t CO ₂ equiv./ t processed)	0	0	0	0

Gas from effect greenhouse	2020	2021	2022	2023
Total emissions	16.585,31	16.798,40	16.424,09	16.963,42
Emissions s/ ton processed	0,122	0,116	0,104	0,104

**No PFCs (perfluorocarbons) or NF₃ (nitrogen trifluoride) were emitted.*

In 2023, the ISO 14,064 Greenhouse Gas (GHG) audit was carried out jointly with the Salt Slag Division plants by a third party (AENOR).

Table: GHG inventory summary for the Salt Slag Division

	TOTAL BES- Valladolid (t CO ₂ eq)	TOTAL BSG- Lünen (t CO ₂ eq)	TOTAL BSG- Hannover (t CO ₂ eq)	TOTAL for all plants (t CO ₂ eq)
SCOPE 1				
TOTAL scope 1	13.048,88	31.056,94	5.404,70	49.510,52
SCOPE 2				
Electric power	3.914,54	6.815,81	1.978,21	12.708,56
Steam	NA	13.274,74	NA	13.274,74
TOTAL Scope 2	3.914,54	20.090,55	1.978,21	25.983,30
TOTAL (SCOPE 1 AND 2)	16.963,42	51.147,49	7.382,91	75.493,82

5.2 Noise.

The noise and vibrations emitted at our facilities are those typical of the industrial treatment plant's activity due to the machines in motion and the movement of trucks transporting raw materials or our products.

For the evaluation of noise emissions to the atmosphere, we have taken as a reference both the legislation in force and the periodicity (biennial) and emission limits established in our AAI (night noise: 55 Laeq dB (A) and daytime noise: 65 Laeq dB (A)).

Law 5/2009 of June 4, 2009, on noise in Castilla y León has also been taken into account, which establishes in Article 13 that, in the case of corrections for the presence of emerging tonal components, low frequency or impulsive noise, the limits will be 5 dB(A) higher than the corresponding value in Annex I.

For this reason, the limits applicable to Befesa Aluminio CT Valladolid are **70 dB (A)** during daytime hours and **60 dB (A)** during nighttime hours.

The results of the 2023 biennial measurements are as follows:

Date 05/15/2023	Point A dB	Point B dB	Point C dB	Point D dB	Point E dB	Point F dB
Daytime	56,4	60,1	56,9	61,3	53,7	52,8
Nocturno	55,7	52,8	58,2	55,4	55,4	54,8

The measurement points are shown in the following map:



5.3 Water

At Befesa Aluminio CT Valladolid, all water generated in the production process and rainwater or runoff water is collected through a system of storage tanks. This recovered water is pumped back into the process to cover part of the water consumption needs. The existence of these tanks allows us a greater margin of maneuver in case of a possible accidental spill that could affect the discharge point.

Outside the process, Befesa Aluminio CT Valladolid has a water discharge authorization granted by the Confederación Hidrográfica del Duero, whose parameters are checked periodically through analytical tests carried out by an accredited laboratory on a quarterly basis. The analytical results are shown below with a comparison of the limit values.

Control point 1: PC-1

- The company discharges its unassimilated rainwater directly into the Pisuerga River through the Duero Canal outfall.

Parameter	2020	2021	2022	2023	AAI limit value
pH	7,42	7,22	7,35	7,37	6-9
Aluminum	0,007	0,1	0,1	0,1	0.5 mg/ L
Suspended solids (MES)	8,75	10	10	10	35 mg O2/ L
COD	39	46,75	54,75	36,5	125 mg O2/ L

Quarterly controls are performed. The data in the table show the average of the 4 analyses carried out during the year. All of them are within the established limits.

With respect to the discharge of rainwater, during 2023 it was **9,873m³** , which is within the **31,500 m³**.

Control point 2: PC-2

- There is a septic tank with seepage of sanitary water into the ground. This discharge is characterized as "urban".

Parameter	2020	2021	2022	2023	AAI limit value
BOD5	<15	34	19,75	21,75	60 mg O ₂ / L
COD	94	80	42,50	72,5	200 mg O ₂ / L
Solids at suspension (MES)	33	28	7,25	23,5	90g/ L
pH	NA	8	7,97	7,72	5.5-9.5 ud pH

Quarterly controls are performed. The data in the table show the average of the 4 annual analyses. All of them are within the established limits.

Taking into account the workers and average water consumption, the estimated discharge from the septic tank is **801.5m³** compared to the **990m³** of the AAI.

- Estimated discharge= Tm*Cm*d (2023) → **73,6 x 33 x 330 = 801504L**
- Tm: average number of workers=**73.6t workers**
- Cm: Average water consumption per person (without shower) =133L (average water consumption according to INE*)-100L (shower)=33 L
 - Data taken from the Water Supply and Sanitation Statistics. of the Year 2020 published by the National Statistics Institute (INE) in 2021.
 - The average water consumption for a shower according to the WHO is 100l for 5 minutes.
- d (2023): Days worked in 2023 at **Valladolid TC=330 days**.

5.4 Waste production.

In accordance with the provisions of Law 7/2022, of April 8, on waste and contaminated soils for a circular economy, Befesa Aluminio CT Valladolid is considered a producer of hazardous waste.

Hazardous waste generated during 2023, are as follows:

Producer No. 07P01094700000009					
Hazardous waste AAI	LER Code	2020	2021	2022	2023
Used oil (t)	130205	1,70	2,86	1,77	1,45
Used oil (t) / t processed		1,35*10 ⁻⁵	1,97*10 ⁻⁵	1,11*10 ⁻⁵	1,08*10 ⁻⁵
Aerosols (t)	160504	0	0	0,055	0,03
Aerosols (t) / t processed		0	0	3,47*10 ⁻⁷	2,23*10 ⁻⁷
Containers leftovers from hazardous substances (t)	150110	14,32	0,6	0,420	0,29
Containers leftovers from substances hazardous (t) / t processed		1,05 *10 ⁻⁴	4,14 *10 ⁻⁶	2,65*10 ⁻⁶	2,16*10 ⁻⁶
Absorbents, filtration materials (t)	150202	3,10	6,97	4,7	2,55
Absorbents, filtration materials (t) / t processed		2,28*10 ⁻⁵	4,81*10 ⁻⁵	2,97*10 ⁻⁵	1,90*10 ⁻⁵
Oil filters (t)	160107	0,07	0,12	0,04	0,12
Oil filters (t) / t processed		5,14*10 ⁻⁷	1,38*10 ⁻⁶	2,52*10 ⁻⁷	8,94*10 ⁻⁷
Chemicals (t)	160506	0,02	0,04	0,015	0,015
Chemicals (t) / t processed		1,47*10 ⁻⁷	8,29*10 ⁻⁷	9,46*10 ⁻⁸	1,11*10 ⁻⁷
Fluorescent tubes (t)	200121	0,13	0	0,01	0,135
Fluorescent tubes (t) / processed t		9,54*10 ⁻⁷	0	6,31*10 ⁻⁸	1,006*10 ⁻⁶
Batteries (t)	200133	0	0,040	0	0
Batteries (t) / t processed		0	2,76*10 ⁻⁴	0	0
Non-halogenated organic solvent (t)	120301	1,2	1,4	1,4	1,2
Non-halogenated organic solvent (t) / t processed		8,81*10 ⁻⁶	9,67*10 ⁻⁶	8,83*10 ⁻⁶	8,94*10 ⁻⁶
Milling dust (t)	100321	427,29	0	0	1,45
Milling dust (t) / t processed		3,14*10 ⁻³	0	0	1,08*10 ⁻⁵
Total (t)		447,83	12,03	8,42	5,79
Total (t) / t processed		0,0031	8,3*10⁻⁴	5,31*10⁻⁵	4,31832E-05

Non-hazardous waste generated during 2023, are as follows:

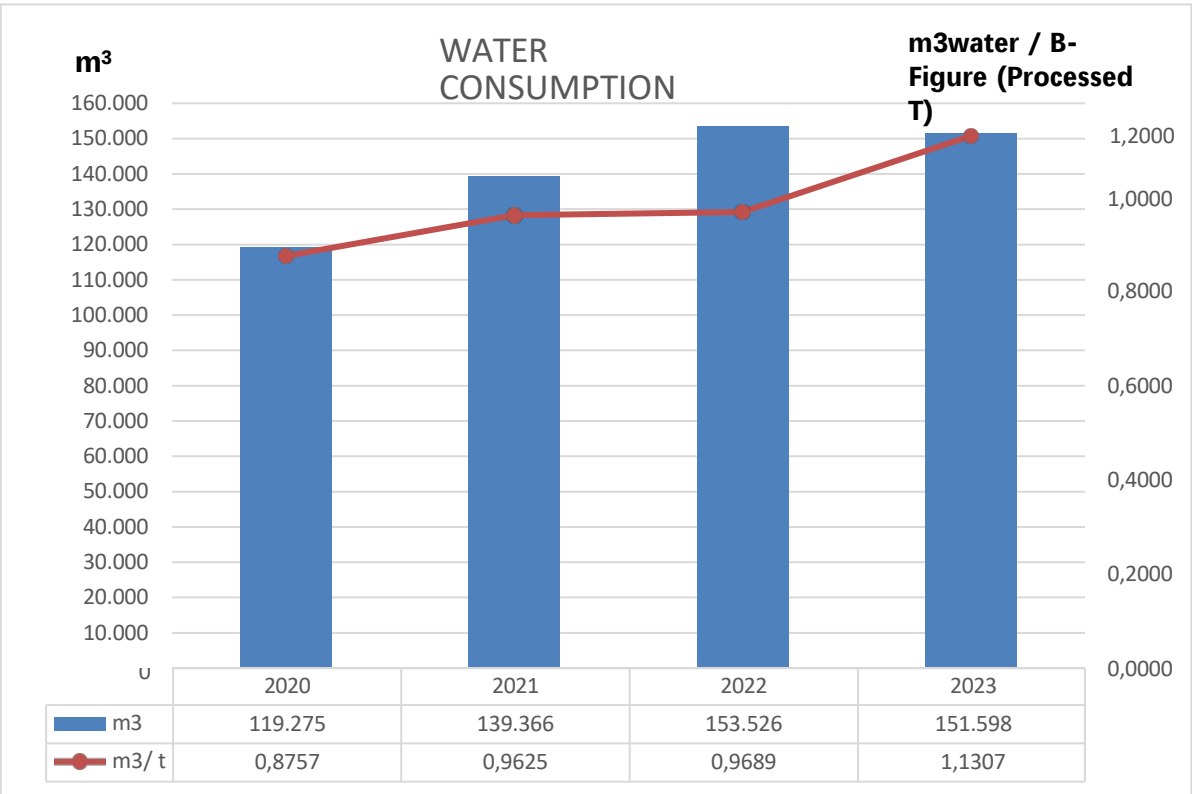
Producer No. 07P03204700000009					
Non-hazardous waste AAI	LER Code	2020	2021	2022	2023
Waste from Construction Waste (CDW) (t)	170107	10,28	8,98	0	0
Waste from Construction (CDWs) (t) / t processed		7,55*10 ⁻⁵	6,20*10 ⁻⁵	0	0
Cardboard and paper (t)	150101	2,760	2,26	2,34	2,54
Cardboard and paper (t) / t processed		2,03 *10 ⁻⁵	1,56*10 ⁻⁵	1,48*10 ⁻⁵	1,86456E-05
Wood (t)	150103	8,10	9,24	8,20	7,08
Wood (t) / t processed		5,95*10 ⁻⁵	6,38*10 ⁻⁵	5,17*10 ⁻⁵	5,28*10 ⁻⁵
Scrap (t)	Various	1.671,98	1.785,56	1.838,00	1.279,64
Scrap (t) / t processed		1,23*10 ⁻³	0,012	0,11	0,009
Septic tank sludge (t)	200304	67,44	66,92	64,3	52,5
Septic tank sludge (t) / t processed		4,95*10 ⁻⁴	4,62*10 ⁻⁴	4,00*10 ⁻⁴	3,91*10 ⁻⁴
Plastic (t)	150105				4,16
Plastic (t) / t processed					3,10*10 ⁻⁵
Total (t)		1.760	1.873	1.913	1.315
Total (t) / t processed		0,011	0,013	0,012	0,0098

All waste produced has been delivered to authorized waste managers for treatment and/or disposal.

6. Basic environmental indicators.

6.1. Water consumption.

The volume of water from the well used in process 1 per unit of total tons processed is shown below.



The amount of water used was **151,598 m3 of water**.³

The request for the extension of the water catchment has been accepted, expanded to **165,600 m3 (165,600 m3)**.³

in the year 2023; it is indicated that there is no inconvenience on the part of the Water Quality Area.

The increase in the volume captured from the well does not imply a modification in the characteristics of the discharge, being justified in the communication to the Duero Hydrographic Confederation.

The increase in water consumption per ton processed is due to the modification of the suction of the turkey warehouse, which has required an increase in the gas scrubbers to be able to capture the ammonia sucked in, in addition to the scarce rainfall during the year, which has prevented the reuse of the rainwater collected.

With respect to the rest of the processes, only water from the Valladolid water network is consumed for sanitary use, so it is not considered significant, being less than 1% with

respect to the consumption of water from the well.

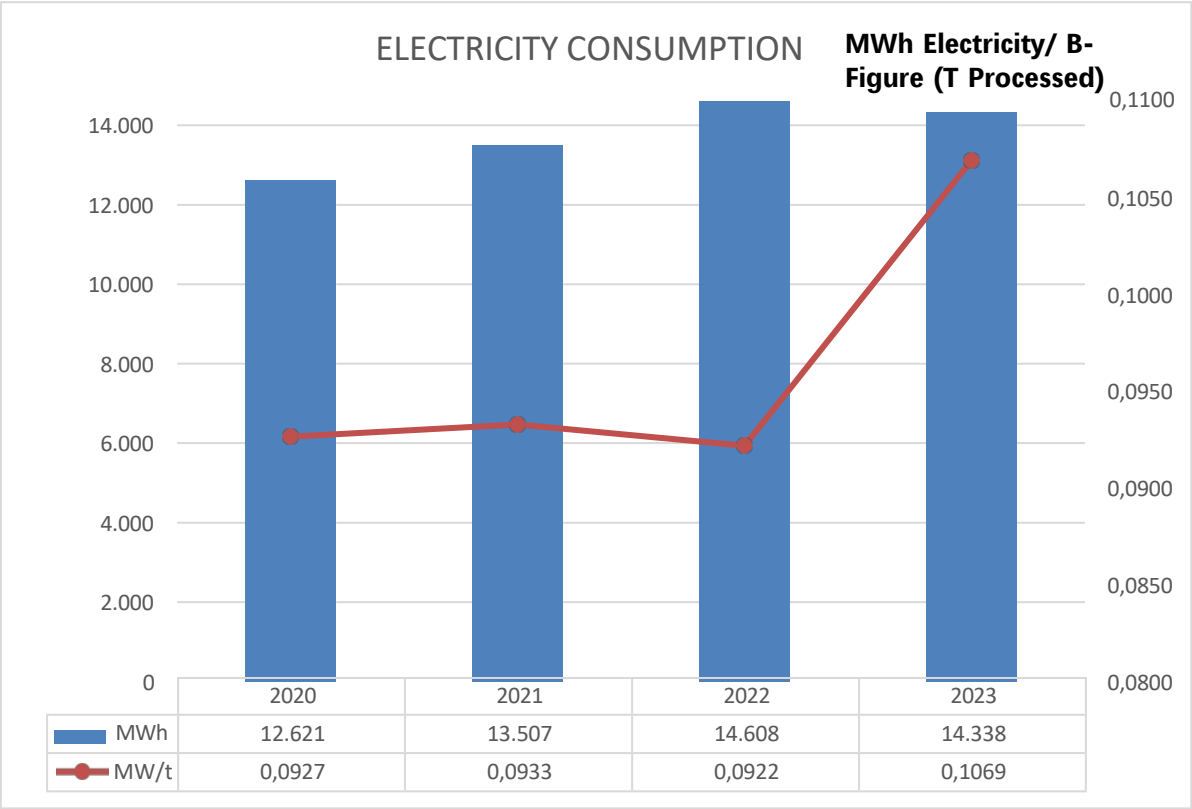
6.2. Energy consumption.

The main fuel at Befesa Aluminio S.L. CT Valladolid is natural gas, which is used in the steam generating boilers, in the rotary dryer and in the torch.

The electrical energy is used to power the motors of pumps, mills, conveyor belts, fans, etc., as well as to control the entire plant.

Diesel fuel is not used in the production process, but is used for internal transportation (loaders and forklifts), heating boiler in one of the buildings and nitrogen for reactor inerting.

Electricity: Total electricity consumption for the last four years per total ton processed is as follows.



Consumption per ton processed remains practically constant, which indicates greater energy efficiency of the process, rising slightly in 2023 due to changes in the nature of the raw material, with milling being more demanding of electrical energy and therefore the rest of the process (reactors-decanters-crystallizers).

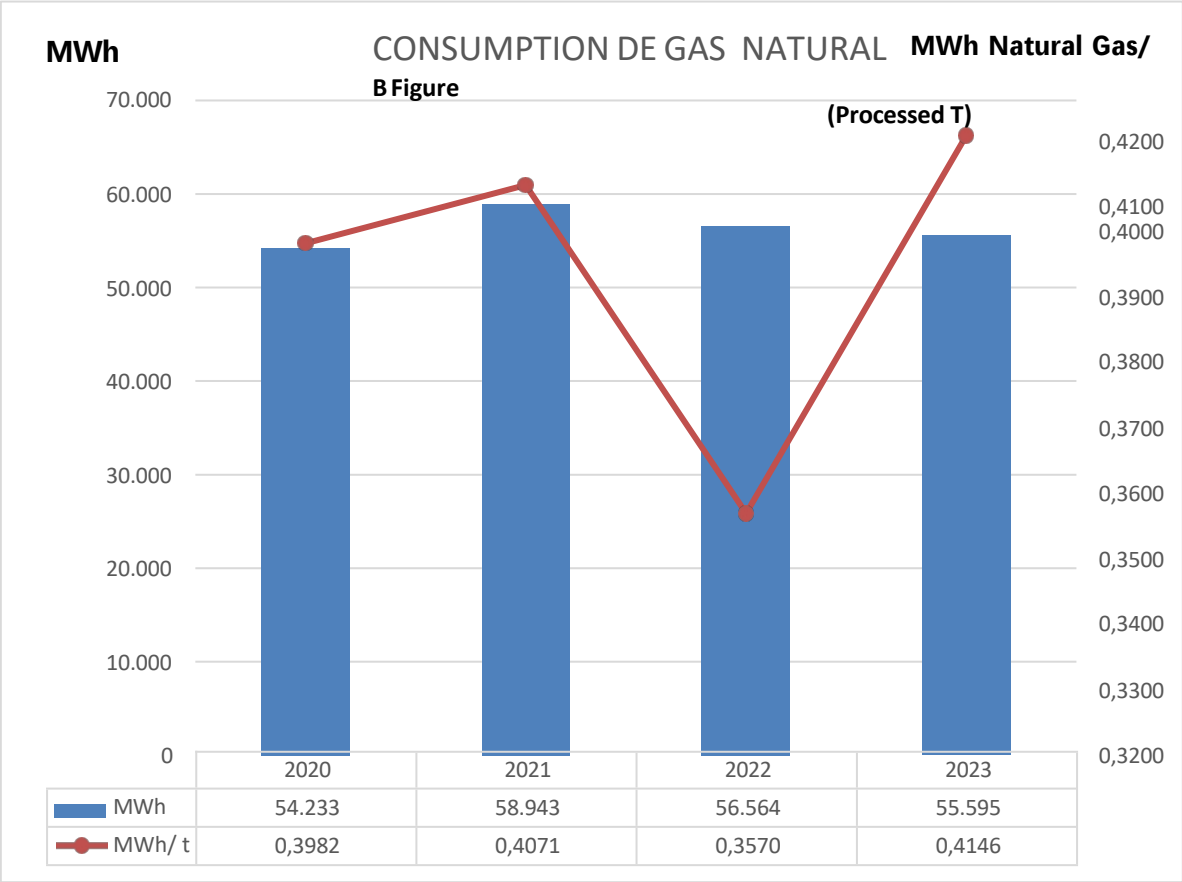
No energy is produced in the facilities of the Valladolid TC, by the organization from renewable energy sources, being the value of 0 Mwh of renewable energy produced. Therefore, the purchase of renewable energy is encouraged.

The energy purchased by the organization from renewable energy sources is **31%** of annual consumption in **2023**.

The origin of the purchase of electric energy is guaranteed by the breakdown of the mix of production technologies corresponding to the energy sold by the commercializing company presented in each invoice.

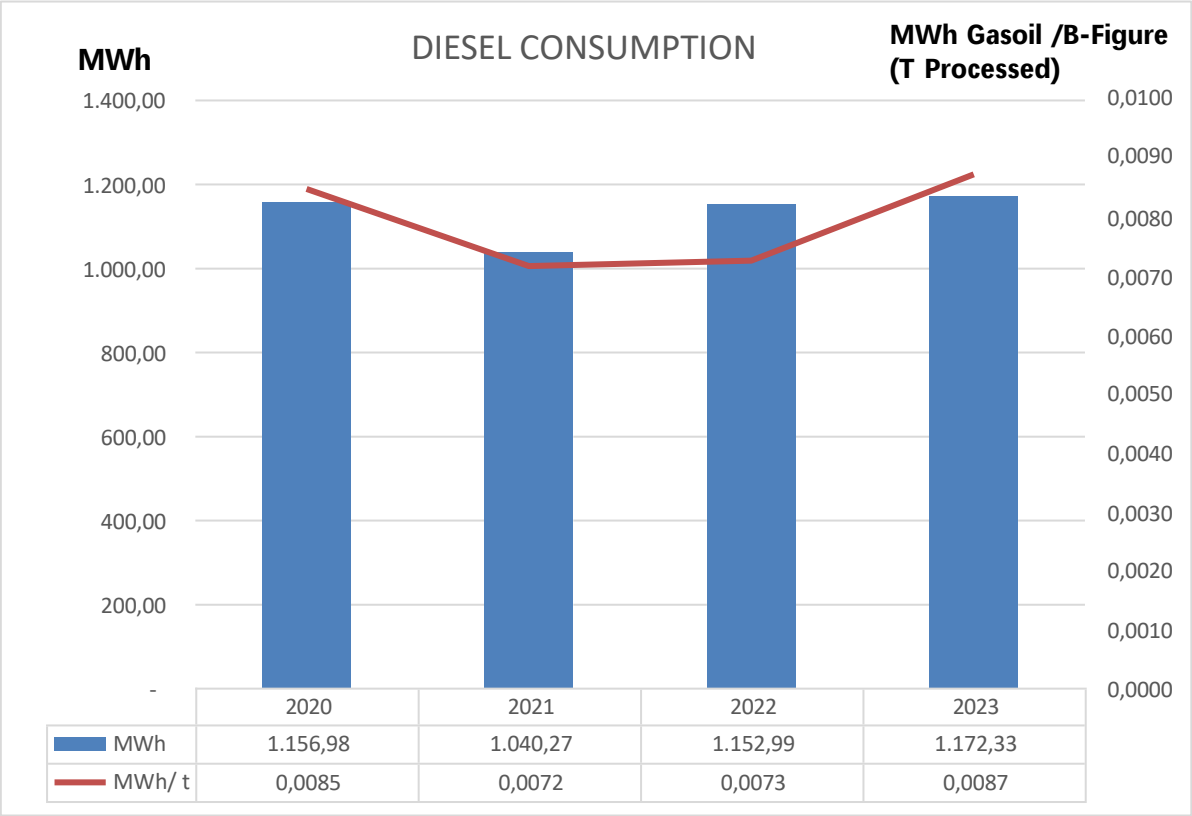
	Renewable energy consumed			
Year	% Energy consumed renewable	Mwh	Mwh / t processed	
2020	14	1.798	0,013	
2021	19	2.613	0,018	
2022	26	3.739	0,024	
2023	31	4.445	0,023	

Natural gas: The consumption of natural gas used to fuel the boilers for the last three years is as follows:



The use of natural drying (hood aspiration system) to the detriment of automated drying in the rotary dryer (natural gas consumption) has made it possible to meet the target value for the year by avoiding the consumption of natural gas in the equipment.

Diesel: Diesel is used for heating the offices and as fuel for the machinery (loaders). The consumption of the last three is shown below.
years.



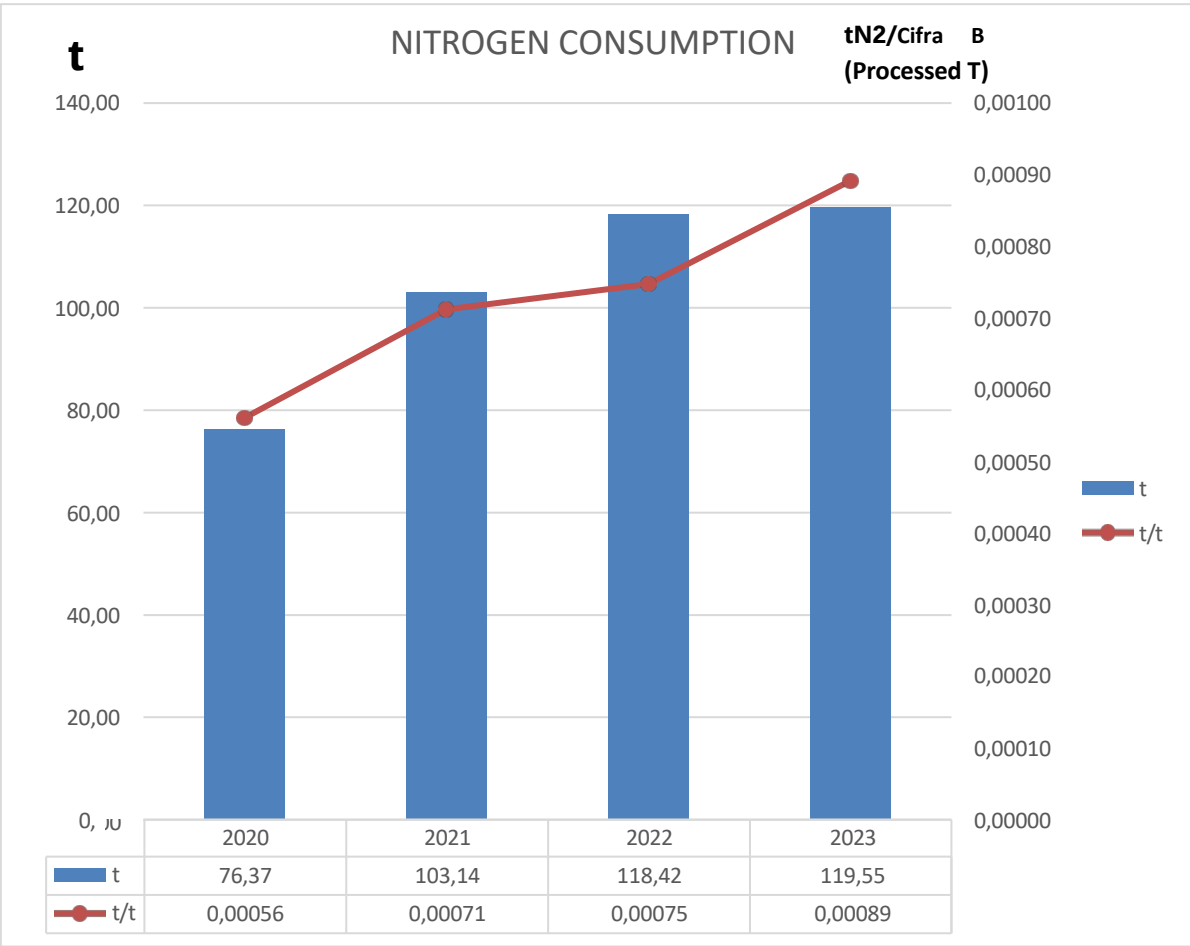
*The conversion of diesel to MWh has been made through the PCI (lower calorific value) of diesel, obtained from the value given by the IDAE 2020 and the density of the safety data sheet, being the value of **10.033 kWh/l**.*

Diesel consumption remains practically stable.

6.3. Nitrogen consumption.

Nitrogen is used for equipment inerting.

Nitrogen consumption varies depending on the number of reactor outages, the consumption for the last four years is shown below.

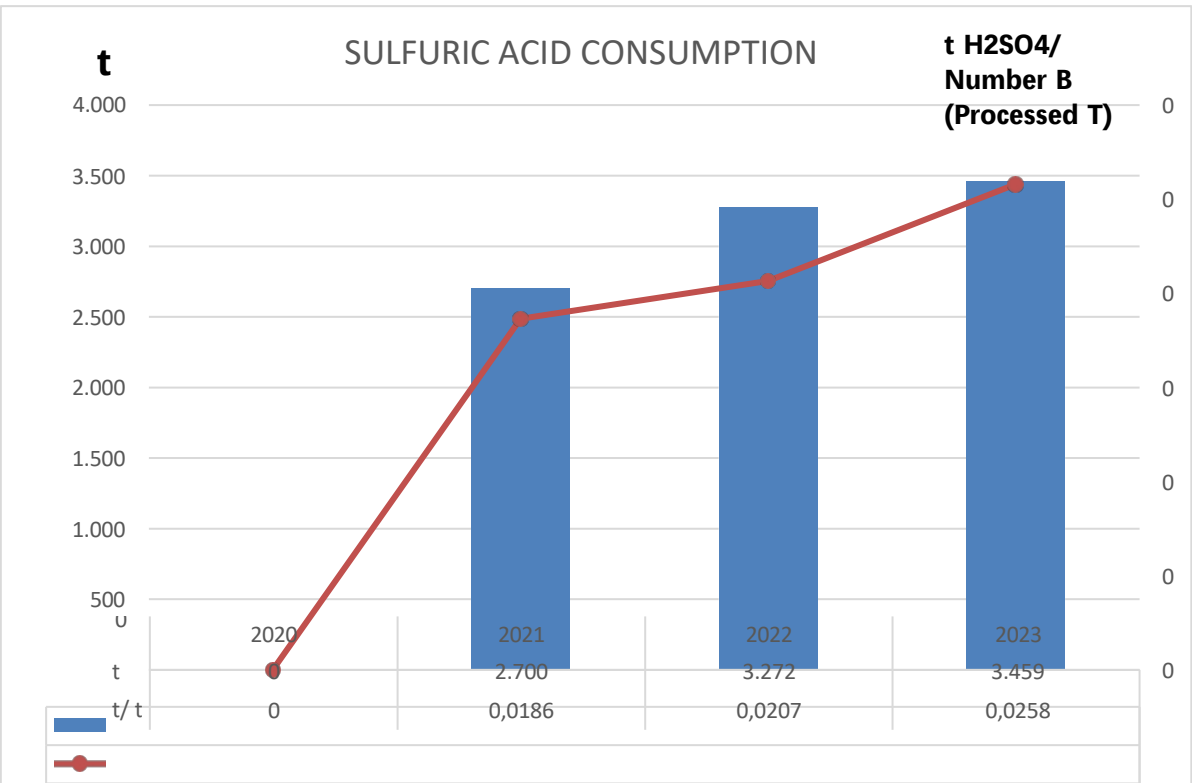


Note: To convert from m³ of nitrogen to tons, the density data indicated in the product safety data sheet is used.

Nitrogen consumption remains practically constant, and the number of shutdowns also remains constant, this is a reactor safety system.

6.4. Sulfuric acid consumption

Sulfuric acid is used for scrubbing the air stream with NH_3 from the drying process as well as from the extraction of the production hall in the scrubbers.



We can observe an increase in the consumption of sulfuric acid with respect to the previous year due to the better use of the gas scrubbers to be able to capture the ammonia generated in the hood installation of the turkey warehouse.

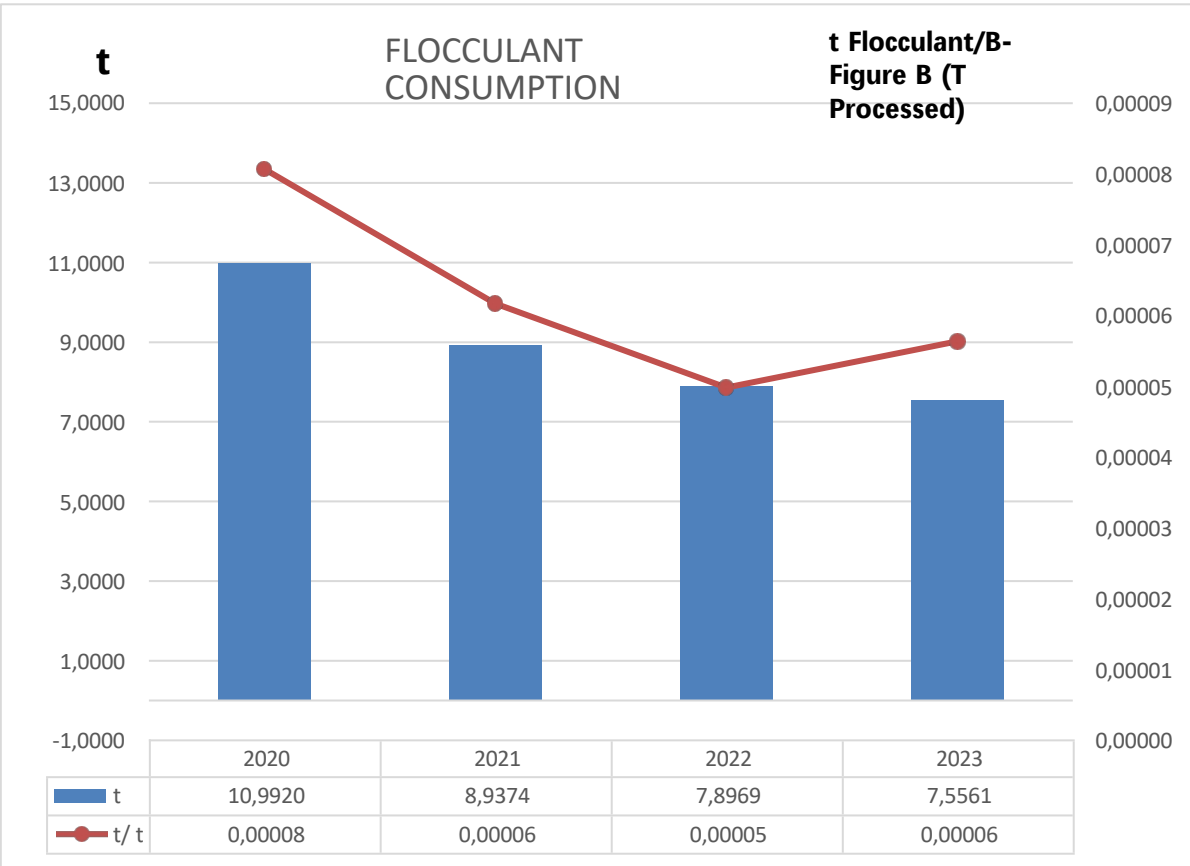
The increase in H_2SO_4 consumption has a direct impact on a greater use of the NH_3 generated in the process and a higher production of ammonium sulfate, which is positive.

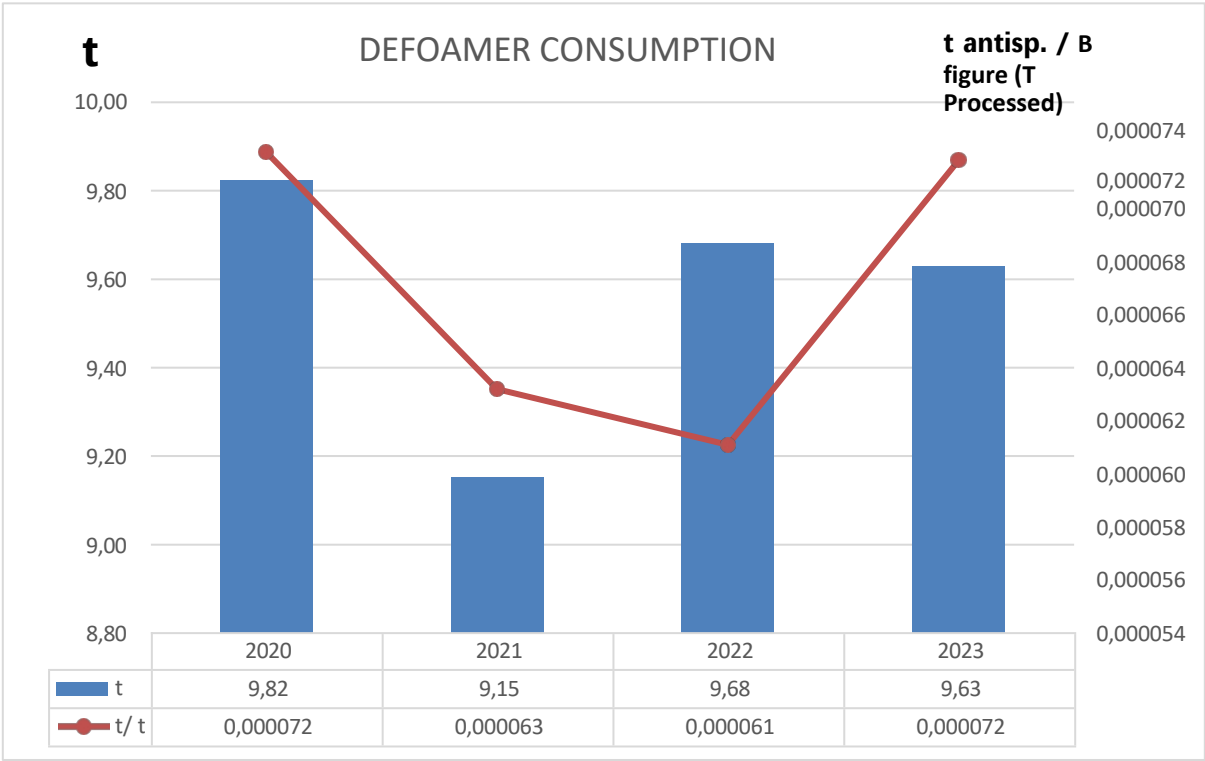
6.5. Consumption of additives

In addition to the raw materials mentioned above, Befesa Aluminio CT Valladolid consumes the following chemical products as additives to the process:

- Flocculant: used in the reaction-decantation process of solids.
- Antifoaming agent: to reduce the formation of foams in reaction and decantation.

The average consumption for the last four years has been:





Both defoamer and flocculant consumption are kept within normal and constant ranges, taking into account that their use varies slightly depending on the nature of the waste received by our customers.

6.6. Biodiversity.

The following is a list of the constructed surface area at Befesa Aluminio CT Valladolid.

Land uses	2021		2022		2023	
	Usable area (m ²)	Usable area (m ² /t processed)	Usable area (m ²)	Usable area (m ² /t processed)	Usable area (m ²)	Usable area (m ² /t processed)
Use total (buildings)	38.757,37	0,268	38.757,37	0,244	38.757,37	0,289
Total sealed surface (waterproof)	97.500,00	0,673	97.500,00	0,615	97.500,00	0,727
Total surface area in the center oriented according to nature	0	0	0	0	0	0
Total area outside the center oriented according to the nature	0	0	0	0	0	0
Total occupancy of facilities	106.700,00	0,737	106.700,00	0,673	106.700,00	1,016

The total occupancy of our facilities is 106,700 m² . However, there is no impact on biodiversity, and neither the land nor the surrounding area is considered a special protection area.

7. Compliance with legal requirements.

At the end of 2020, Order FYM/1088/2020, dated October 13, was published regarding the review for their adaptation to the BATs and waste regulations of the companies "Befesa Aluminio, S.L." and "Befesa Aluminio, S.L.U."; the Non-Substantial Modification 17 (MNS17) of "Befesa Aluminio, S.L.U."; and to the unification of the environmental authorizations of the scrap, aluminum waste and salt slag treatment and recovery plants, in the municipality of Valladolid, of both companies, in "Befesa Aluminio, S.L.U." as the sole owner. The order limits its effects to the revision and adaptation to the best available techniques (BAT) of the integrated environmental authorization (AAI), to the incorporation of the non-substantial modification 17 (MNS17) and to the unification of the environmental authorizations held by Befesa Aluminio, S.L.U. The implementation of the modifications included in this order will take effect during the first four months of 2021.

ORDER FYM/1007/2021, of August 27th, which modifies Order FYM/1088/2020, of October 13th, regarding the review to adapt the BATs and waste regulations of the companies "Befesa Aluminio, S.L." and "Befesa Aluminio, S.L.U." and the Non-Substantial Modification 17 (MNS17) of "Befesa Aluminio, S.L.U." and the unification of the environmental authorizations for the treatment and recovery plants for scrap, aluminum waste and salt slags, in the municipality of Valladolid, of both companies, in "Befesa Aluminio, S.L.U." and the unification of the environmental authorizations of the scrap, aluminum waste and salt slag treatment and recovery plants, in the municipality of Valladolid, of both companies, in "Befesa Aluminio, S.L.U." as the sole owner, as a consequence of Non-Substantial Modification 18 (MNS 18). 043-21-MNSVA

- Installation of a new reactor that will act as a backup to maintain the production rate during the cleaning, shutdown and maintenance operations of the other five reactors.
- Installation of metal separation equipment at the end of the salt slag crushing process, in order to increase the recovery of the metallic aluminum contained in the slag, as well as to increase the quality of the aluminum concentrates obtained in this part of the process.

ORDER MAV/1027/2022, of August 3, which modifies Order FYM/1088/2020, of October 13, regarding the review for their adaptation to the BATs and waste regulations, of the companies "Befesa Aluminio, S.L." and "Befesa Aluminio, S.L.U." and the non-substantial

modification 17 (MNS17) of "Befesa Aluminio, S.L.U." and the unification of the environmental authorizations of the scrap and aluminum waste treatment and recovery plants.

and salt slags, in the municipality of Valladolid, of both companies, in "Befesa Aluminio, S.L.U." as the sole owner, as a consequence of the non-substantial modification 19 (MNS 19). 027-22-MNSVA

- Expansion and modification of the collection system currently installed in the aluminum oxides storage building (Paval), through the replacement and expansion of the current hood together with the new installation of two adjacent hoods, increasing the storage and collection capacity.
- Increased scrubber treatment capacity with the installation of new filling and expansion of the contact/washing surface, which will improve the system's efficiency from 95 to 97.5%.

EMAS:

COMMISSION REGULATION (EU) 2018/2026 of 19 December 2018 amending Annex IV to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organizations in a Community eco-management and audit scheme (EMAS).

COMMISSION REGULATION (EU) 2017/1505 of 28 August 2017 amending Annexes I, II and III to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organizations in a Community eco-management and audit scheme (EMAS).

DECREE 53/2015, of July 30, establishing the procedures for the processing, suspension and cancellation of registration in the Register of organizations adhering to the Community Eco-Management and Audit Scheme in the Community of Castilla y León.

Regulation (EC) No. 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organizations in a Community eco-management and audit scheme (EMAS) and repealing Regulation (EC) No. 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC.

Royal Decree 239/2013 of April 5, 2013, establishing the rules for the implementation of Regulation (EC) No. 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation of organizations in a system

(EMAS), and repealing Regulation (EC) No. 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC.

Emissions:

Royal Legislative Decree 1/2016, of December 16, which approves the revised text of the Law on Integrated Pollution Prevention and Control.

- ✓ Submitting to the Junta de Castilla y León the measurements taken in 2021 with the limits established in the corresponding AAI (Integrated Environmental Authorization).

Royal Decree 508/2007 of April 20, 2007, which regulates the provision of information on emissions of the E-PRTR Regulation and integrated environmental authorizations.

- ✓ Reporting all emissions and waste data in the PRTR Castilla y León Registry by February 2023.

Noise and vibrations:

Regulation for the Protection of the Environment against Noise and Vibration Emissions of the City Council of Valladolid.

Submitting a technical report of biennial measurements accrediting technical compliance with noise levels, the last one submitted in May 2023 and being in compliance at all measurement points.

Waste:

Law 7/2022 of April 8, 2002 on waste and contaminated soils for a circular economy.

- ✓ Complying with this law with all waste generated and processed at the facilities.

Royal Decree 553/2020, of June 2, regulating the transfer of waste within the territory of the State.

✓ Complying with the requirements established for the transfer of waste. Registration in the Registry of Hazardous and Non-Hazardous Waste Manager with number 7G04084700000009 and 07G01964700000009 respectively and registration in the Registry of Hazardous Waste Producer No. 07P01094700000009.

- ✓ Presenting in February 2023 both the annual report of managers and producers for the year 2022.

- ✓ Waste minimization study presented for the period 2019-2022. Royal Decree 646/2020, of July 7, regulating the disposal of waste by landfill.

- ✓ In compliance with the same.

Floors:

Royal Decree 9/2005, of January 14, 2005, which establishes the list of potentially soil contaminating activities and the criteria and standards for the declaration of contaminated soils.

- ✓ Complying with the delivery of the soils report dated 05/10/2016.
- ✓ In June 2019, a detailed analytical characterization of the subsoil at the Befesa Aluminio CT Valladolid facilities was carried out. The subsoil was found to be affected by hydrocarbons not related to any of the site's sources, but to a historical accidental spill prior to the paving of the plot. As there are soils with concentrations higher than the generic reference levels (GRLs) contemplated in said legislation, a Quantitative Risk Analysis (QRA) was carried out. This report determines that, after analyzing the possible current and future scenarios at the site and its surroundings, there is no unacceptable risk to human health derived from the existing condition of the soils at the site.
- ✓ On 16/07/2020, the Junta de Castilla y León received a letter from "Communication on acceptance of the soil status report according to royal decree 9/2005."

Energy efficiency:

Royal Decree 56/2016, of February 12, transposing Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012 on energy efficiency as regards energy audits of service providers and energy auditors and promotion of energy supply efficiency.

- ✓ In compliance with this royal decree, the energy audit is carried out and submitted to the Junta de Castilla y León on 23/09/2016. The communication is received

by the latter on the administrative registration of energy audits dated 04/10/2016.

- ✓ On 06/25/2020 the energy audit communication was made.

Environmental responsibility:

Law 26/2007, of October 23, 2007, on Environmental Responsibility and Order ARM/1783/2011, of June 22, by which, before 10/31/2018, the company must communicate the constitution of the financial guarantee that allows it to face the environmental responsibility inherent to its activity, in case it is enforceable.

Royal Decree 2090/2008, of December 22, 2008, approving the Regulations for the partial development of Law 26/2007.

Law 11/ 2014, of July 3, amending Law 26/ 2007, of October 23, on environmental responsibility.

Royal Decree 183/ 2015, of March 13, amending the Regulations for the partial development of Law 26/2007, of October 23, 2007, on Environmental Responsibility, approved by Royal Decree 2090/2008, of December 22.

- ✓ On 19/07/2018, the responsible statement determining the financial guarantee was delivered to the Junta de Castilla y León.
- ✓ The risk analysis report is carried out by an external company. Following the Environmental Risk Analysis (ARA) carried out, it can be concluded that, given the amount of the costs of repairing the potential environmental damage to be expected, within the framework of the provisions of Law 26/2007, on Environmental Responsibility, there is no obligation to deposit a mandatory financial guarantee.
- ✓ In March 2022, a new report on the analysis and assessment of the environmental risk by an external company, as a consequence of one of the requirements of Annex III of the Environmental Conditions of ORDER FYM/1088/2020. As in the previous report, it is concluded that there is no obligation to deposit a mandatory financial guarantee.

Royal Decree 208/2022, of March 22, on financial guarantees for waste.

- ✓ In compliance with the same.

Chemicals:

Royal Decree 656/2017, of June 23, approving the Regulation on the Storage of Chemical Products and its Complementary Technical Instructions MIE APQ 0 to 10.

- ✓ In compliance with the same.

REGULATION (EU) 2019/1009 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of June 5, 2019, of 2019 laying down provisions on making EU fertilizer products available on the market, amending Regulations (EC) No 1069/2009 and (EC) No 1107/2009 and repealing Regulation (EC) No 2003/2003

- ✓ In compliance with the same.

Legionella:

Royal Decree 865/ 2003, of July, establishing the hygienic-sanitary criteria for the prevention and control of legionellosis.

- ✓ Complying with all operating notifications and maintenance operations. **Standard that will be repealed. See subsequent legislation.**

Royal Decree 487/2022, of June 21, establishing the health requirements for the prevention and control of legionellosis.

- ✓ Complying with all operating notifications and maintenance operations.

Oil installations:

Royal Decree 2085/ 1994, of October 20, 1994, approving the Regulation of Petroleum Installations (Amended by Royal Decree 1523/ 1999, of October 1, 1999).

- ✓ Periodic inspections of the installations are carried out periodically.

Firefighting installations:

Royal Decree 513/2017 on Regulation of fire protection installations.

- ✓ Complying with the conditions for industrial establishments in case of fire.

Electrical installations:

Royal Decree Royal Decree 842/2002, of August 2, 2002, approving the Low Voltage Electrotechnical Regulations.

- ✓ Complying with the established requirements in terms of revisions.

Royal Decree 337/ 2014, of May 9, 2014, approving the regulation on technical conditions and safety guarantees in high voltage electrical installations and its technical instructions.

- ✓ Complying with the established requirements in terms of revisions.

Thermal installations:

Royal Decree 1027/2007 approving the Regulation of Thermal Installations in Buildings. The Royal Decree has been prepared jointly by the Ministry of Industry, Tourism and Trade together with the Ministry of Housing.

Royal Decree 178/2021, of March 23, amending Royal Decree 1027/2007, of July 20, 2007, approving the Regulation on Thermal Installations in Buildings.

- ✓ In January 2017, the thermal installations of several work center facilities were registered.
- ✓ Periodic inspections of the installations are carried out periodically.

Transportation of goods:

European Agreement concerning the International Carriage of Dangerous Goods by Land (ADR)

- ✓ In compliance with its last amendment of 2023.

Water.

Authorization from the Duero Hydrographic Confederation for the discharge of sanitary sewage into the ground.

- ✓ Filing the annual declaration report.
- ✓ Complying with the requirements of Royal Legislative Decree 1/ 2016 approving the revised text of the Law on Integrated Pollution Prevention and Control.

- ✓ Submitting to the Junta de Castilla y León the measurements taken during the year 2021 in compliance with the limits established in the AAI.

Authorization has been granted by the Duero Hydrographic Confederation for direct discharge into the Pisuerga river through the Duero canal drainage.

- ✓ Filing the annual declaration report.

By means of file CP 23302-VA, the Duero Hydrographic Confederation granted Befesa Escorias Salinas S.A. a concession for the exploitation of groundwater, with a maximum annual volume of 119,300 m³.

- ✓ In January 2021, procedures were initiated with the River Basin Authority (Confederación Hidrográfica del Duero for the modification of the characteristics of the groundwater exploitation concession. A maximum annual volume of 165,600 m³ has been requested.

Order FYM/1088/2020 establishes the effluent emission limit value in the following areas 31,500 m³ per year.

- ✓ Complying with the new established limits.

8.-Communication and participation in the field of the environment.

Befes Aluminio CT Valladolid has communication, consultation and participation procedures that define, among other points, the existing ways and means, both for internal communication (from the Befesa Group with the Escorias Salinas Division, from the General Manager of Escorias Salinas with the plant, and communication with workers and/or their representatives) and external communication (customers, suppliers, investors, authorities, etc.). Throughout the year 2023 there have been no sanctions related to environmental issues or complaints from stakeholders.

In order to carry out the consultation and participation of employees and/or their representatives, the Valladolid work center carries out the following activities:

- **Works council:** the works council together with the company's management meets periodically in accordance with current legislation. The minutes of these meetings are posted on the bulletin boards.
- **Accident and environmental incident investigations** with generation of lessons learned documents.
- **Whistle-blower channel**, located on the Befesa website (www.befesa.com) through which anyone can anonymously report breaches of the code of conduct.
- **Suggestion box:** There is a suggestion box available to employees in the cafeteria of the facilities.
- **Toolboxtalks:** a brief presentation to workers on a single aspect of HSQE.
- **Environmental Preventive Observations (OPA):** visits to the plant to review compliance with environmental management procedures, in which discussions are held with workers and possible opportunities for improvement or deficiencies are recorded.
- **5S:** 5S audits (order and cleanliness), regulated by technical instruction IHSQEESP.07.
- **Informal meetings, which may be daily, weekly or monthly**, in which, although workers do not participate directly, they are collected and reviewed.

The demands or suggestions are analyzed by process managers and shift supervisors.

- **Bulletin boards:** employee participation is encouraged through the posting of job openings, new job openings, information for receive suggestions for ongoing or planned projects
- **Psychosocial risk surveys:** every two years, the company conducts a psychosocial risk survey and, based on the results obtained, the following is established a plan of action if necessary.
- **Environmental triptych and documents on good environmental practices with respect to waste management:** this is an informative document to help employees in the correct classification of waste, on the following topics which, if they have any doubts or questions, they can consult the environmental manager. It is provided to workers in the induction training given to them on their first day of work.





- **Format for improvement opportunities and nonconformities:** is managed by through the continuous improvement procedure. Employees can fill out the corresponding form and put it in the mailbox or hand it in to the person responsible for the process.
- **HSQE Newsletter:** published both by e-mail and on **HSQE** bulletin boards. plant announcements. Among other issues, it informs employees about aspects related to environmental objectives, consumption or waste generated.
- **Integrated Environmental Authorization.** Befesa has an Integrated Environmental Authorization published in the Official Gazette of Castilla y León (BOCYL).

9.-Other relevant activities in the environmental field.

In accordance with the ISO 14.001:2015 standard and the European EMAS Regulation, Befesa Aluminio CT Valladolid has undergone the corresponding environmental audits, both internal and external, to verify the correct operation of the environmental management system in place.

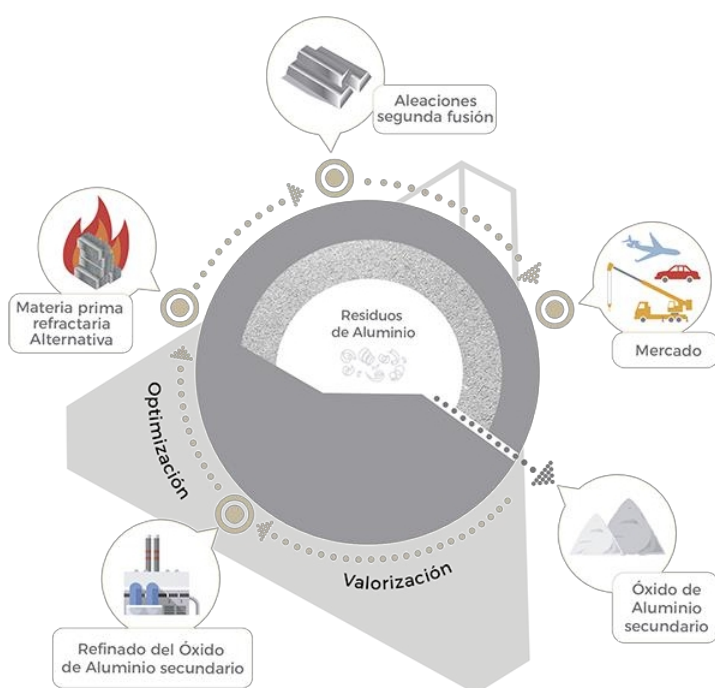
Audits are a key element in verifying the correct performance of each of the management system processes. When non-conformities are detected during the course of the audits, corrective actions are established to eliminate these non-conformities.

The internal and external audit program has been satisfactorily completed during the year covered by this statement.

- Befesa Aluminio CT Valladolid has environmental certification for CO₂; UNE-EN ISO 14064-1:2019. Greenhouse gases, for the quantification and reporting of greenhouse gas emissions and removals. (ISO 14064-1:2018), in addition since November 2016 it was also certified under the ISO 50.001 standard on energy efficiency in order to reduce energy consumption and derived from this, reduce CO₂ emissions to the atmosphere.
- Befesa belongs to and actively participates in the following associations:
 - Spanish Confederation of Metal Business Organizations CONFEMETAL being an active member of the environmental committee.
 - Asociación Española de gestores de residuos especiales ASEGRE (Spanish Association of Special Waste Managers): This association brings together companies in Spain whose activity is the management of hazardous waste.
 - Valladolid Metal Businessmen's Association (VAMETAL)
 - European Aluminium

- Befesa regularly participates in R&D&I programs with different research centers and other European companies, mainly aimed at improving the recycling, valorization and complete utilization of aluminum industry waste.
- Life Bauxal II project that will allow the transformation of a secondary aluminum oxide (paval) into an alternative raw material to bauxites in the manufacture of refractories.

More information can be found on the project website: <http://www.bauxal2.com/>.



- HyInHeat is a European-funded project aimed at integrating hydrogen as a fuel in the high-temperature heating processes of energy-intensive industries, especially in the aluminum and steel sectors. The project aims to reduce carbon dioxide emissions in these sectors by implementing efficient hydrogen combustion systems covering almost their entire process chain.

More information can be found on the project website: <https://hyinheat.eu/>.



10.- Next environmental statement.

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

The next validated environmental statement will be made in June 2025.

The environmental verifier validating this declaration is Bureau Veritas Certification, a certification body accredited by ENAC under No. ES-V-0003, located at Calle Valportillo Primera, 22-24; Edificio Caoba- Polígono Industrial La Granja 28108 Alcobendas, Madrid.

This declaration is valid for a period of one year from the date of validation.



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EMAS verifier number:
ES-V-0003 Validated
Environmental
Statement
according to Regulation
(EC) 1221/2009 as
amended by
Regulations (EU)
2017/1505 and (EU)
2018/2026.
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