

**BEFESA****Validation of Results 2025****EMAS Registration No.: ES-CYL-000034****Ctra. de Cabezón s/n, 47011 Valladolid, Spain.****www.befesa.com****Tel. +34 983 250600****Fax: +34 983 630105**

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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 specializing in the recycling of steel dust, salt slag, and aluminum waste, as well as logistics and other related industrial services. It offers specialized environmental services for the comprehensive management of industrial waste from the steel and aluminum industries. Its operations are divided into two business units: Steel Dust Recycling Services and Aluminum Salt Slag Recycling Services.



Befesa Aluminio’s Valladolid Work Center (CT), part of the Aluminum Salt Slag Recycling Business Unit, offers recycling services for waste from the primary and secondary aluminum industries.

ALUMINUM SALINE SLAG RECYCLING SERVICES		
Aluminum salt slag and SPL recycling services	Secondary aluminum recycling services	Technology and Machinery
•Befesa Aluminum (Valladolid Plant) •Befesa Salzschlacke (Hanover Plant) •Befesa Salzschlacke (Lünen Plant)	•Befesa Aluminum (Erandio Plant) •Befesa Aluminum (Barcelona Plant) •Befesa Aluminium Germany (Bernburg Plant)	

This report will analyze all environmental information related to the Valladolid Treatment Center.

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

Our facility, Befesa Aluminum CT Valladolid (CNAE-38.32, updated in 2025 to CNAE 38.21), focuses on the “recycling, recovery, and valorization of waste from primary and secondary aluminum production.”

From the receipt of industrial waste, through storage and subsequent treatment, we are constantly mindful of minimizing any potential environmental effects or impacts that our process might generate.

The facility is located within the municipality of Valladolid and occupies an area of approximately **136,257 m²**, of which **9,981 m²** are used for facilities related to production processes.

The recycling and recovery processes at Befesa Aluminio CT Valladolid have been recognized as Best Available Techniques (BAT) in the European Commission’s BREF (Best Available Techniques Reference) documents for non-ferrous metallurgy.

Befesa Aluminio CT Valladolid’s operations are divided into four processes, described below:

Process 1: Production of aluminum concentrates through physicochemical treatment.

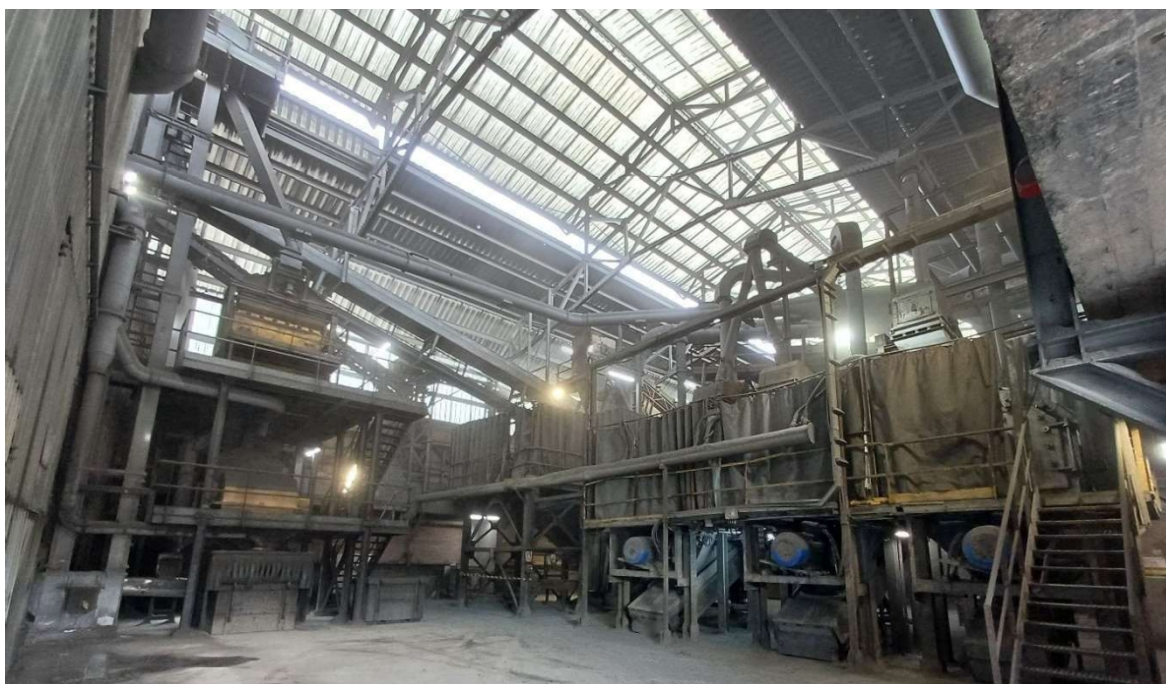
The recycling process operated by Befesa Aluminio CT Valladolid enables the recovery of free metal and flux salts and the formation of inert products, composed mainly of aluminum oxide.

The process consists of mechanical crushing and metal separation, the reaction of hazardous components and aqueous dissolution of the salts, filtration of the inerted material, and subsequent crystallization of the salts.

Specifically, the phases are as follows:

Grinding: The purpose of this treatment is, on the one hand, the extraction of metallic aluminum and, on the other hand, to reduce particle size to ensure a complete reaction of the reactive components and the dissolution of the contained salts.

It involves breaking up large blocks; once the material has been crushed, it is screened to obtain the first product of the recycling process, which is the aluminum concentrate. The remainder is reduced to powder and sent to the next stage.



Dissolution-Reaction: The material (powder) obtained in the previous step is mixed with water to dissolve the salts.

The mixture is treated to render the waste non-hazardous. The gases produced during the dissolution process are incinerated in the flare.

After the reaction process, the settled sludge proceeds to the next stage (filtration), and the brine is sent to the crystallization process, described below.

Filtration-Drying: The sludge obtained is washed and filtered before being transferred to the storage area, where a multi-stage drying process takes place until shipment.

Once the final product is ready, it is called Pavai and has multiple industrial applications, such as: cement manufacturing, the refractory brick industry, rock wool production, etc.



Crystallization: The brine undergoes a process of evaporation and subsequent condensation, yielding salt (a mixture of NaCl and KCl) and water, which is reused in the process.



Gas scrubbing: The ammonia from the previous stages is directed to the gas scrubbers, where, through scrubbing with sulfuric acid, ammonium sulfate is produced; this is used in the fertilizer, rock wool, and panel industries.



Table 1: Summary of Products Obtained and Applications

SUMMARY OF PRODUCTS OBTAINED AND APPLICATIONS	
Paval	• Manufacture of cement clinker. • Manufacture of ceramic and refractory products. • Manufacture of thermal and acoustic insulation. • Manufacture of products for blast furnace deoxidation (steel industry)
Ammonium sulfate	• Fertilizer industry • Thermal and acoustic insulation industry • Wood industry
Salt	• Flux salt in secondary aluminum smelters. • Winter road maintenance
Aluminum	• Secondary aluminum smelters

Process 2: Grinding and separation of aluminum slag.

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

During 2024, this facility was used on an ad hoc basis.

**Process 3: Grinding and separation of aluminum scrap.**

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



Process 4: Storage of waste not subject to treatment. Befesa Aluminio Valladolid

Operations Center is authorized to receive and store authorized waste prior to treatment in enclosed facilities.

1.3. Waste received:

In general, all data reported in this report will be provided as absolute values and referenced to the metric tons of waste processed (considering waste processed from the moment it enters the grinding process).

The activity of Befesa Aluminio Valladolid Work Center is the recycling of received waste; therefore, all environmental indicators will be referenced in metric tons of processed waste.

The breakdown of treated waste in metric tons over the last five years is as follows:

Table 2: Summary of waste treated (t) / year

Material Treated (t)	EWC Code	2021	2022	2023	2024	2025
Salt Slags (P1)	100,308	133,505	142,209	123,668	136,357	134,703
SPL (P1)	161,101/161,103	11,103	15,747	10,412	11,416	9,720
Aluminum slag powder (P1)	100,321	0	0	0	0	0
Filter dust (P1)	100.319	0	0	0	0	0
Foundry Sand (P1)	101.106	0	0	0	0	0
Aluminum (P4)	120,103 160,118 191,203	128	506	0	0	0
Aluminum slag (P2)	100,304	65	0	0	0	0
Totals		144,801	158,462	134,080	147,773	144,423
Note: P = process						

The breakdown of products obtained in metric tons over the last three years is as follows:

Table 3: Products Obtained (t)

Product produced (t and %*)	2021	2022	2023	2024	2025
Salt	41,989 (29%)	43,347 (27%)	40,626 (33%)	47,166 (24%)	44,290 (23%)
Paval	113,048 (78%)	117,756 (74%)	117,876 (88%)	128,234 (67%)	131,975 (67%)
Aluminum concentrate	11,993 (8%)	13,311 (8%)	11,479 (9.28%)	10,114 (5%)	8,269 (6%)
Ammonium sulfate	10,661 (7%)	12,113 (8%)	12,811 (9.5%)	14,141 (7%)	11,548 (4%)
Totals	177,691	186,527	182,793	199,657	196,084

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

**The total sum of percentages exceeds 100% due to moisture and the generation of new materials (hydrated oxides, etc.)

1.4. Description of the Integrated Management System.

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

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

Company management defines an Integrated Policy for Befesa's Escorias Salinas Division based on health and safety, quality, the 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 policy was last revised and amended in May 2026.

P-IMS - Befesa Escorias Salinas Division Integrated Policy

As a leader in the recycling and reuse of primary and secondary aluminum, Befesa Escorias Salinas—with its recycling plants in Valladolid (Spain), Lünen, and Hannover (Germany)—focuses its operations on this core activity, which contributes to sustainable development through safe, efficient, and effective management.

The management of Befesa Escorias Salinas recognizes that the key to the success of its operations is the satisfaction of all stakeholders (customers, direct and indirect employees, subcontractors, authorities and legislators, the local community, etc.), and therefore agrees to implement the following policy, which establishes the following commitments:

- 1. Commitment to occupational safety and health, accident prevention, and the improvement of working conditions: Befesa Escorias Salinas protects the occupational safety and health of all employees (direct and indirect) by complying with legal requirements and other occupational safety and health requirements, and implements improvements to eliminate unsafe behaviors and conditions and mitigate risks. To this end, the company implements a zero-accident policy in which employee participation is an essential element for preventing occupational hazards and promoting safety. Befesa has implemented a framework for integrating its occupational health and safety management system that complies with the requirements of the ISO 45001:2023 standard.*
- 2. Commitment to a supportive work environment, equal treatment in the workplace, skills development, and work-life balance: Befesa Escorias Salinas supports equality in the workplace and training to enhance its employees' skills, and fosters a climate of trust through compliance with regulations, analysis of employees' needs and expectations, and the establishment of standard guidelines for labor relations based on integrity, responsibility, and loyalty. Befesa has an internal procedure for managing absenteeism to address its causes and ensure every employee's right to active*

employment.

3. *Commitment to the Quality of Products and Services: Befesa Escorias Salinas is committed to providing its customers with products and services that meet legal and regulatory requirements, as well as customer-specific quality standards. Befesa Escorias Salinas works toward continuous improvement in accordance with the company's strategic objectives and taking into account the organizational context and the needs and expectations of customers, assessing risks and taking measures to eliminate or mitigate these risks. To this end, Befesa has implemented a quality management system in accordance with the ISO 9001:2015 standard.*

4. *Commitment to Environmental Protection: Befesa Escorias Salinas is committed to preventing pollution and protecting the environment in accordance with applicable legal requirements and other commitments that Befesa may undertake, based on the organization's context and taking into account its activities, products, and services throughout their life cycle. To this end, the company maintains a system for identifying, assessing, and reducing environmental impacts that promotes the rational use of natural resources, waste reduction, the circular economy, and continuous improvement. This includes Befesa's commitment to mitigating climate change by improving energy efficiency and reducing the greenhouse gas footprint of its products and services, moving toward a sustainable economy. To this end, Befesa has implemented an environmental management system in accordance with the ISO 14001:2015 standard.*

5. *Commitment to Energy Efficiency and Energy Management: Befesa Escorias Salinas recognizes the importance of efficient energy management and strives to achieve maximum efficiency. To this end, Befesa maintains an energy efficiency management system that ensures the continuous improvement of energy performance—including energy efficiency, energy use, and consumption—sets continuous improvement objectives, ensures the availability of the information and resources necessary to achieve them, integrates energy performance into strategic decisions, and complies with legal requirements and other energy and efficiency requirements. In addition, Befesa Escorias Salinas applies the Best Available Technology and promotes the procurement of energy-efficient products and services. This commitment is confirmed by ISO 50001:2018 certification.*

6. *Commitment to the confidentiality of sensitive information and to the protection and proper processing of personal data: Befesa Escorias Salinas treats information confidentially as a matter of principle, supports the security of legally protected data and the appropriate use of information technologies in compliance with the established guidelines of the Befesa Group, promotes the rationalization, optimization, and simplification of data processing, and continuously improves the effectiveness and efficiency of IT systems.*

7. *Legal Obligations, Risk Mitigation, and Continuous Improvement: Befesa Escorias Salinas is committed to fulfilling its legal and other obligations to identify, assess, and eliminate or mitigate identified risks; prevent unintended impacts; pursue continuous improvement and transparency; take into account the needs and expectations of relevant stakeholders; and consider the context and characteristics of the organization when developing its strategy.*

The management of Befesa's Salt Slag Division ensures that this policy is maintained and implemented and that it is understood and accepted by all stakeholders.

This policy is available to all interested parties upon request. This policy is distributed to all employees and explained to them directly.



Carlos Ruiz de Veye, General Manager,

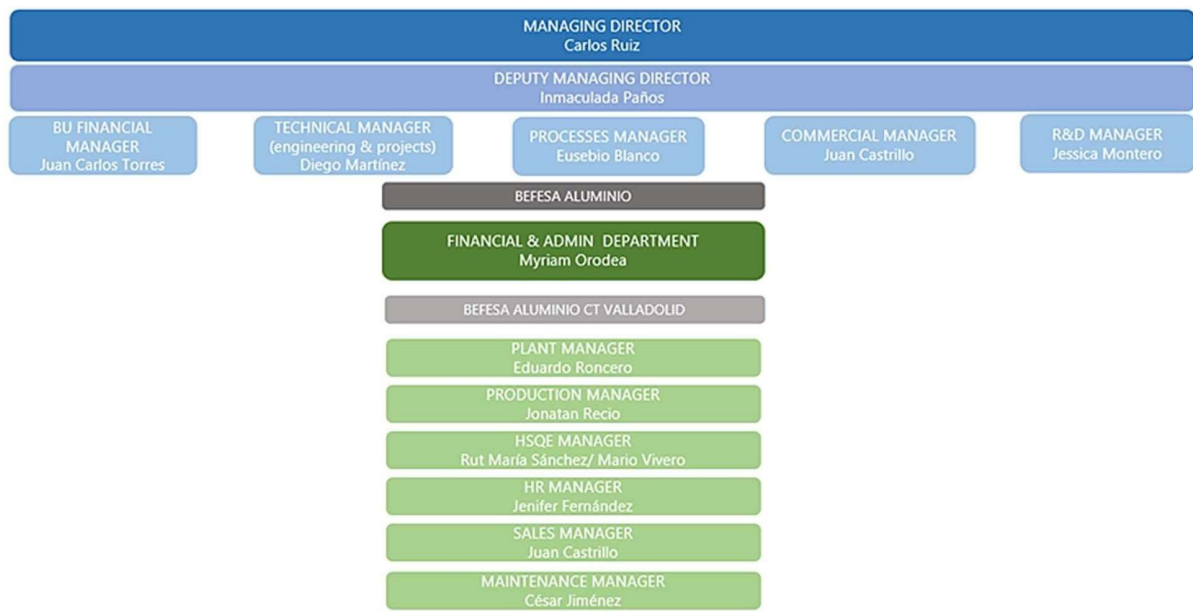
Salt Slag Recycling Division,

Valladolid/Hannover/Lünen, May 2026

2. Organizational Structure

To carry out activities related to the Integrated Environmental Management System, the Valladolid facility has the necessary human resources, as defined in the organization’s chart:

Table 4: Organizational Chart



3. Environmental Aspects.

3.1. Assessment Methodology:

Befesa identifies 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 established criteria.

Therefore, in identifying environmental aspects, both direct and indirect aspects of activities, products, and services have been taken into account, considering the DNSH Principles and the European Taxonomy, as well as the various stages of the life cycle, including the contracting of services for treatment, reception, production, transportation, and use of the resulting products.

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

These aspects include:

- Air emissions
- Discharges to water, including seepage into groundwater
- Generation, recycling, reuse, transport, and disposal of hazardous and non-hazardous waste
- Land use and soil contamination
- Energy use
- Use of additives and auxiliaries
- Local issues (noise, vibrations, odors, dust, visual impact)

Indirect environmental aspects result from the interaction between the company and third parties and are those over which the company can exert a reasonable degree of influence.

These aspects include:

- Life-cycle aspects that the organization can influence
- Investments
- New markets
- Environmental performance and practices of contractors and suppliers

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

- Relevant applicable legislation and internal requirements.
- Harm or benefits to the environment, including biodiversity
- Harm or benefits to the company.
- Environmental conditions
- Severity, frequency, and reversibility of the aspect or impact
- Stakeholder concerns/complaints

Based on these criteria, when assessing the significance of the aspects, scores are assigned to determine which ones are significant. To do so, the following are taken into account:

- Existing data on material and energy consumption, discharges, waste, and emissions in terms of risks
- Activities regulated by environmental legislation
- Procurement 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 into 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 arising from new projects, as well as from emergency situations or abnormal operating conditions—that may impact the surrounding environment.

Furthermore, 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 in Regulation (EU) 2018/2026, which amends Annex IV of Regulation (EC) No. 1221/2009, the changes that each identified aspect may cause to the environment are determined from a life-cycle perspective (environmental impacts).

Befesa takes its significant environmental aspects into account when planning its Integrated Environmental Management System and defining its environmental objectives and targets:

Positive direct and indirect environmental aspects considered **significant** under normal conditions: Assessment of aspects 2025

Table 5: Positive Environmental Aspects

Process	Activity	Significant environmental aspects	Environmental Impact	Remarks	No. Aspect
Strategic Management	Contracting for treatment services	Disposal of RTPs	Water/Soil Pollution	Befesa CT Valladolid's operations consist of providing sustainable solutions to the primary and secondary aluminum industries through the treatment and recycling of the hazardous waste they generate.	1
Strategic Management	Recycled product generation: Pavai	Raw Material Consumption	Resource depletion	Befesa CT Valladolid closes the loop on natural resource conservation by collecting hazardous industrial waste, recycling it, and subsequently reintroducing valuable materials into the production process (salt, pavai, aluminum, and ammonium sulfate). Befesa has been part of the circular economy for more than three decades.	2
Strategic Management	Recycled Product Generation: Salt	Raw Material Consumption	Resource depletion		3
Strategic Management	Recycled product generation: aluminum	Raw Material Consumption	Resource depletion		4
Strategic Management	Recycled product generation: ammonium sulfate	Raw Material Consumption	Resource depletion		5
Financial	Purchasing environmental liability insurance and extended liability bonds	Company environmental liability	Soil/water/air pollution	Befesa CT Valladolid has environmental liability insurance that covers liabilities arising from its operations.	6
Sales and Marketing	New markets, new products, and new applications	Raw Material Consumption	Resource depletion	Befesa CT Valladolid's business consists of providing sustainable solutions to various industries by bringing high-value-added products to market—products derived from a recycling process—thereby avoiding the consumption of raw materials	160

Direct negative environmental impacts considered **significant** under normal conditions: Environmental Impact Assessment 2025

Table 6: Negative environmental aspects

Process	Plant Zone/Area	Activity	Significant environmental aspects Significant	Environmental Impact	Actions	Code
Production (RTD)	Plant	Phase II: dissolution/reaction/decanting; Phase III: filtration/transport/product storage; Phase IV: crystallization; Phase VI: gas scrubbing; Product transport loads 3: salt; Raw material and process control (lab); Offices 2 (with changing rooms); Pilot plant development; Workshops; Scheduled shutdowns; Projects: construction work	Water consumption	Resource depletion (drought), GHG emissions	Reduction of chlorides in the Paval through the use of stormwater for cake washing: Almost all of the water added to the process passes through filters to be reused as much as possible, with the goal of achieving a product with the lowest possible chloride content. One stream of water entering the process that is not currently being used directly for cake washing comes from the rainwater collection system; this water enters the process but goes directly to the decanters rather than passing through the filters first. The goal here is to test whether this water can help us achieve more thorough washing of the material, thereby improving its quality and marketability.	RTD-2026-SP-OBJ-BES/4.3
Production (RTD)	Crystallization	Phase IV: Crystallization	Electricity consumption	Resource depletion, GHG emissions	Modification of the crystallization process to reduce energy consumption per metric ton processed by 5%. The gradual improvement of the crystallization facilities will also reduce safety risks in the salt extraction process by lowering the operating temperature, thereby reducing wear caused by erosion at high temperatures	PM-2026-2025- Others- OBJ-2, PM-2026- ROA- OBJ- 1

4. Program of Objectives and Targets.

Objectives and targets are established annually based on the identification and assessment of environmental aspects and impacts.

The progress of the proposed actions and the degree of compliance with the established objectives are reviewed monthly.

4.1. Summary of Objectives and Targets for 2024–2025.

For the 2024–2025 fiscal year, the following objectives were established to reduce significant environmental aspects, the results of which were quantified during 2025:

Table 7: Objective: Energy Consumption

Improvement in Energy Performance Internal code: EE-2025-SP-OBJ-1, ENG-2025-RO-OBJ-1, ENG-2025-SP-OBJ-2		Associated indicator: • Reports Submitted • Meetings held	Annual target: Preparation and distribution of 12 reports. Holding 4 annual meetings with process managers. Baseline: 100%
Goals	Responsible Party	Deadline	Resources
Goal 1 Distribute monthly energy efficiency (EE) analyses to maintenance, engineering, and production managers at the factory. Goal 2 Hold regular, dedicated meetings of the Energy Efficiency team	Energy Efficiency	December 2025	PowerCloud

To improve energy performance, energy indicators are now distributed monthly to all affected processes.

This information is supplemented by bimonthly meetings to monitor goals, deviations, and consumption levels of the SEUs (major energy consumers).

During 2025, a total of **12** monthly **reports** were sent, and **4** **meetings** were held, as planned at the beginning of the year.

Objective achieved.

Table 8: Objective: Electricity Consumption

Projects to improve facilities, operational performance, and technology Improve process safety technology and increase automation, energy efficiency, and productivity. Meet project objectives Internal code: ENG-2025/2024/2023-RO-, ENG-2025-SP-OBJ-2, ENG-2025-SP-OBJ-2, OBJ-1, PM-2025-Others-OBJ-1 / EE-2025-RO-OBJ-2		Associated indicator: % progress	Baseline Value: progress
Targets	Responsible	Deadline	Resources
Goal 1 Sulfuric acid pump panel Goal 2 Renovation of peristaltic pumps Goal 3 Replacement of dissolution augers with Redler conveyors Goal 4 Renovation of grinding electrical panels Goal 5 Compliance certification for the 4/4 low-voltage installation Goal 6 Upgrade of the grinding plant.	Engineering	December 2025	€2,880,000

Of the 14 improvement projects initially proposed, 8 were ultimately implemented due to a budget cut.

All projects were completed on time and within budget. The objectives outlined for each project were achieved, with the exception of the reaction feed scale, where the selected technology did not yield the expected results and its reliability fell short of requirements.

The degree of compliance was 95%.

Objective met.

Table 9: Natural Gas Consumption Objective

Harness the energy from the reaction gas stream to reduce natural gas consumption Engineering, procurement management, construction, and commissioning of the Hydrogas plant Internal code: ENG-2025-RO-OBJ-1, ENG-2025-SP-OBJ-2, PM-2025-Others-OBJ-4, IDI-2025-2024-2023-SP-OBJ-2; IDI-2025/2024-RO-OBJ1; IDI-2025/2024-RO-OBJ5, IDI-2025-SP-OBJ-1 / IDI-2025-2024-2023-SP-OBJ-2 / EE-2025-RO-OBJ-4		Associated indicator: % Progress	Baseline Value: progress
Targets	Responsible	Deadline	Resources
Goal 1 Basic engineering design Goal 2 Negotiation and contracting of services and purchase of equipment Goal 3 Project planning Goal 4 Budget Control	Engineering	December 2025	N/A

The gas generated during the process is analyzed, and its composition and flow rate are evaluated for subsequent energy recovery.

Basic engineering is carried out, the entire installation and equipment are negotiated with suppliers, and subsequent project milestones are planned.

100% compliance with the plan

Objective achieved.

Table 10: Reduction in Municipal Solid Waste

Reduction of municipal solid waste by improving the separation of recyclable and recoverable fractions This is the only type of waste we generate that is not currently being sorted Internal Code HSQE-2025/2024/2023-RO-OBJ-6		Associated indicator: % reduction in MSW	Baseline: 8.3 metric tons sorted to Magonsa Plastics: 3.78 metric tons of cardboard packaging + 4.58 of plastic
Goals	Person in Charge	Deadline	Resources
Goal 1 Environmental Campaign Goal Goal 2 Food-Contact Plastic Sorting Goal 3 Separation of Food-Grade Paper Packaging	Quality, Environment, and Risk Prevention Occupational	December 2025	NA

Efforts were made to improve waste sorting in the workplace by organizing an awareness campaign in partnership with ECOEMBES, followed by the installation of recycling bins based on the identified needs.

A total of 8.3 metric tons of municipal solid waste was sorted and sent to Plásticos Magonsa, of which 3.78 metric tons consisted of cardboard packaging and 4.58 metric tons consisted of plastic packaging.

Objective achieved.

Table 11: Improvement in Environmental Performance

Improvement in the environmental impact of the products generated Internal code: HSQE-2025/2024-RO-OBJ-1, HSQE-2025/2024-RO-OBJ-3, COM-2025/2024-SP-OBJ-1, COM-2025-SP-OBJ-2, EE-2025-2024-2023-SP-1		Associated indicator: Obtaining certification	Baseline value: Obtaining certification
Targets	Responsible Party	Deadline	Resources
Goal 1 CHC Registration for SAM Goal 2 Registration of DAP ACV carbon for Paval Goal Goal 3 AAI Update - MNS20	Quality, Environment, and Prevention	December 2025	€10,473

Certification is obtained for the Paval DAP and the carbon footprint calculation for ammonium sulfate.

MNS 20 is submitted to the Regional Government of Castile and León for the adaptation of waste codes.

Objective achieved

Table 12: Objective: Knowledge Enhancement

Improve internal knowledge of ISO and EMAS standards to enhance the integration of the management system across all areas and in decision-making. Reduce the risks of non-compliance with requirements, improve understanding of the management system, and recognize the benefits of its proper implementation. Internal code: HSQE-2025-2024-2023-SP-OBJ-3, HSQE-2025/2024-RO-OBJ-1, HSQE-2025-RO-OBJ-4, KHM-2025-RO-OBJ-4		Associated indicator: Training Completed / Training Planned	Baseline: Training ratio: 100%
Targets	Responsible Party	Deadline	Resources
Goal 1 SGI Training Plan on ISO 9, 14, and 45 Standards	Quality, Environment, and Safety	December 2025	NA

Senior management and process managers are trained on the ISO 9001/14001/45001 standards.

The degree of compliance with this objective is 100%.

Objective met

Table 13: Objective: Improvement of the recycling process

Improve the recycling process to make it more environmentally sustainable Project development focused on decarbonizing the smelting process. Study of the potential for energy recovery from the reaction gas stream. Study of different alternatives to reduce fugitive ammonia emissions Internal code: IDi-2025-2024-2023-SP-OBJ-2; IDi-2025-2024-RO-OBJ1; IDi-2025-2024-RO-OBJ5 and IDi-2025-SP-OBJ-1		Associated indicator: Degree of implementation according to the schedule (%)	Baseline value: 100% Compliance
Targets	Responsible Party	Deadline	Media
Goal 1 Development of scheduled milestones for the Hyinheat project Goal 2 Progress on the ECOESC project to meet objectives Goal 3 Conducting laboratory-scale and pre-industrial-scale tests to reduce NH3	IDi	December 2025	NA

All projects have been completed according to schedule.

- Hyinheat Project: In 2025, all planned actions associated with the grant-funded project were carried out. The study of the saline slag obtained has been postponed until the next fiscal year until a gas analyzer or a system capable of determining its composition is available.
- Ecoesc Project: During 2025, the influence of different variables on the recycling process of saline slag and SPL was studied by analyzing various parameters. The influence on gas composition could not be confirmed

because suitable analytical methods were not available to continuously monitor this parameter.

- Reduction of Diffuse Ammonia Emissions: In 2025, a method was developed to neutralize the ammonia odor at Paval, which was validated at the laboratory, pilot, and semi-industrial scales.

Objective achieved

Table 14: Objective: Improvement of Energy Efficiency

Improving energy efficiency Assess and implement measures for plant equipment to reduce electricity consumption Internal code: MAI-2025-BCP-OBJ-2, EE-2025-2024-2023-SP-OBJ-2, MAI-2025-BCP-OBJ-2, ENG-2025-RO-OBJ-1, ENG-2025-SP-OBJ-2		Associated indicator: Measures implemented	Baseline: No. of actions (3)
Targets	Responsible Party	Deadline	Resources
Goal 1 Identify and evaluate measures within plant teams that reduce electricity consumption Goal 2 Implement feasible measures	Maintenance	December 2025	N/A

In 2025, the following potential measures for plant equipment to reduce electricity consumption were identified: pump automation, expansion of lighting control, and expansion of lighting circuits, with all three measures to be implemented throughout the year.

The objective is to continue improving energy efficiency; see Tables 19, 21, 25, 26, 28, and 29.

Objective met

Table 15: Objective to improve natural gas consumption at the plant

Change in crystallization process Gradual improvement of the crystallization facilities to enable operation of all equipment while reducing energy consumption (NG) per metric ton processed, minimizing the risk associated with salt extraction, and increasing Internal code: PM-2025-Others-OBJ-2, ENG-2025/2024/2023-RO-OBJ-1 / RTD-2025-RO-OBJ-2		Associated indicator: Actions carried out	Baseline: No. of actions (3)
Targets	Responsible Party	Deadline	Resources
Goal 1 Identify and evaluate measures within plant teams that reduce electricity consumption Goal 2 Implement feasible measures	Process	December 2025	€245,000

A partial change was made to the crystallization process (brine lines), with inconclusive results; although brine consumption was slightly higher, plant operations did not meet production expectations. The facility was returned to its previous configuration, and the

process was suspended by management decision.

Objective NOT met

Table 16: Objective: Reduction in Water Consumption

Reduction in natural resource consumption through lower use of condensate water in the process. Shared with maintenance. This objective is based on replacing the current level controls in the transfer tanks of the crystallization plant with more efficient ones that do not require a water supply to remain operational. The current controls require a constant water supply of about 0.5 m³/h to keep them clean and functioning properly, and there are three locations in the plant equipped with this system, resulting in a condensate savings of about 1.5 m³/h. All of this water that will not be used in the crystallization plant (approximately 36 m³/day) can be used at other points in the process, thereby reducing the consumption of new raw water. The consumption of treated water will be monitored in the KPIs. Internal code: RTD-2025/2024/2023-RO-OBJ-4 / MAI-2025-SP-OBJ-2		Associated indicator: Water consumption (m³/h)	Baseline value: 1.5 m³/h
Goals	Responsible Party	Deadline	Resources
Goal 1 Installation and commissioning of level sensors in the transfer tanks.	Production	December 2025	€8,000

Although the cubic meters per metric ton ratio has been slightly higher than the previous year, a total of 993 m³ less water was consumed in 2025 than in 2024. Consumption could not be reduced further due to increased water usage resulting from all the pressure washing that had to be performed at the plant on production equipment, as well as a period during which the Paval had to be moistened in order to ship it to a new customer.

Objective Achieved

4.2. Summary of Objectives and Targets for 2026.

After reviewing and analyzing the results for fiscal year 2025, taking into account significant environmental aspects and analyzing the risks and opportunities of the business unit, the following objectives are formulated for the year 2026.

Table 17: Objective: Reduce energy consumption by improving the grinding process

Reduction of secondary grinding cycle times to achieve greater energy efficiency in the area. "The addition of the new screening station has not only increased milling capacity but has also altered the performance of the secondary mills that are part of the milling facility; since they now process a greater volume of material larger than 1 mm, they operate more efficiently. Given this situation, the plan is to review the plant's performance and gradually adjust the operating parameters to reduce grinding cycle times without compromising aluminum quality, while increasing operational availability during these cycles to achieve longer downtime periods in the area, resulting in energy savings." Internal Code: RTD-2026-SP-OBJ-BES/6.3	Associated indicator: Initial cycle time versus final cycle time	Annual Target: 2%		
Targets	Responsible Party	Deadline	Resources	
Goal 1 Adjustment of the aluminum separator after modification. Goal 2 Gradual reduction of grinding cycle times until a 2% reduction is achieved in each cycle on the secondary lines, and monitoring of the plant's operation and concentrate yields.	Production	December 2026	N/A	

Table 18: Water Consumption Reduction Target

Reduction of chlorides at Paval through the use of stormwater for cake washing. Almost all of the water added to the process passes through filters to be reused as much as possible, with the goal of achieving a product with the lowest possible chloride content. One stream of water entering the process that is not currently being used directly for cake washing comes from the rainwater collection system; this water enters the process directly into the decanters rather than passing through the filters first. The goal here is to test whether this water can help us achieve more thorough washing of the material, thereby improving its quality and marketability. Internal code: RTD-2026-SP-OBJ-BES/4.3	Associated indicator: Chlorides in Paval versus Chlorides in Paval without the system	Annual Target Value: ≤0.3%	
Targets	Responsible Party	Deadline	Resources
Goal 1: Industrial trial involving the installation of a small tank and a pump to add this water to the process to assess the effect of this change. Goal 2 If the test is successful, study options for better storing this water and adding it to the process in a controlled manner.	Production	December 2026	N/A

Table 19: Objective: Improvement in energy consumption during crystallization

Modification of the crystallization process to reduce energy consumption per metric ton processed by 5% The gradual improvement of the crystallization facilities will also reduce safety risks in the salt extraction process by lowering the operating temperature, thereby reducing wear caused by erosion at high temperatures Internal code: PM-2026-2025-Others-OBJ-2, PM-2026-ROA-OBJ-1	Associated indicator: Energy consumption in kWh/metric ton of processed salt slag	Annual Target: 100% of the plan	
Targets	Responsible Party	Deadline	Resources
Goal 1: Identify solutions for operating crystallizer 03.C.24 as a last resort through pressure drop studies, literature reviews, external consultations, etc. Goal 2 Reconfiguration to operate with 5 stages: modification of loop 62-56, to be able to feed the centrifuge and achieve the required temperature required	Process	December 2026	CAPEX

Table 20: Energy Consumption Reduction Target (Natural Gas)

1% reduction in steam consumption compared to the previous fiscal year (Natural gas, kW/metric ton) Improvement in the energy performance of the crystallization plant through measures related to the management of condensate, steam, and insulation Internal Code: EE-2026-ROA-OBJ-01 / PM-2026-ROA-OBJ-01	Associated indicator: Monitoring of the action plan		Annual Target: 100% of the plan
Targets	Responsible Party	Deadline	Resources
Goal 1: Identify potential actions directly related to direct steam savings (waste, venting, insulation, controls, literature, etc.). Goal 2: Define an action plan based on the above proposals Objective 3: Monitoring of actions derived from the action plan and monitoring of consumption	Energy Efficiency	December 2026	N/A

Table 21: Goal: Improving the Final Disposal of Generated Waste

Increase the percentage of waste classified as “Recycled at final disposal” (R1-9) relative to waste classified as R12/R13: 5% reduction (2025: 142 metric tons not recovered) “Reducing environmental impact through the recovery of waste generated at the workplace • R1—Recycled or recovered at final disposal • R12 - Waste transfer: Transfer of waste to undergo any of the operations R1 through R11. • R13 - Waste storage: Storage of waste to subject it to any of the operations R1 through R12.” Internal code: HSQE-2026-RO-OBJ-2, HSQE/KHM-2026-ROA-OBJ-2		Associate d indicator: % of Waste Recovered	Value Annual Target: Reduction 7 metric tons (5%)
Targets	Person in Charge	Deadline	Resources
Goal 1 Search for new waste management alternatives or renegotiate the final disposal destination with current waste management providers	Quality, Environment, and Prevention	December 2026	N/A

Table 22: Training Objective

Improve internal knowledge of ISO standards to ensure the proper integration of the management system across all areas and in decision-making. Establish procedures to prevent the loss of key know-how. Reduce the risks of non-compliance with requirements, improve understanding of the management system, and enhance the benefits of its proper implementation Internal Code: HSQE/KHM-2026-ROA-OBJ-2, HSQE-2026/2025/2024/2023-SP-OBJ-3, HSQE-2026/2025/2024-ROA-OBJ-1, HSQE-2026/2025-RO-OBJ-4, HSQE/KHM-2026-MR-OBJ-5		Associated indicator: Number of training sessions provided	Value Annual target: 30 training sessions delivered 70% on the written test
Targets	Person in charge	Deadline	Resources
Goal 1 Internal Auditor Training Goal 2 Specific Training in Energy Efficiency (ISO 50001) Goal 3 Basic Training in Integrated Management Systems for Middle Management Goal 4 Specific training on Integrated Management Systems for process managers Goal 5 Evaluation of Training Effectiveness	Quality, Environment, and Safety	December 2026	N/A

Table 23: Objective: Reduction in Energy Consumption (Compressed Air)

Monitor compressed air consumption to make real-time decisions regarding compressed air usage based on the plant's operating status. Be aware of waste, leaks, etc. Improving the energy efficiency of one of the various energy sources through compressed air flow control Internal code EE-2026-ROA-OBJ-03	Associated indicator: Q/metric ton processed		Annual target value: Q/metric tons processed
Goals	Person in Charge	Deadline	Resources
Goal 1 Installation of a compressed air flow meter on the main line Goal 2 Monitoring of consumption/flow/plant status (via SCADA) Goal 3 Proposals for follow-up actions based on variations in flow rate/plant status	Energy Efficiency	December 2026	Power Cloud

Table 24: Energy Consumption Target

Implementation and analysis of KPIs related to energy performance in projects and modifications By including energy information in new projects and modifications, we expect to improve understanding of and the impact of KPIs on the efficiency of projects and modifications, thereby facilitating the potential for action and, therefore, the potential to improve their energy performance Internal Code: EE-2026-ROA-OBJ-02		Associated : No. of approved changes / No. of changes proposed	Value Annual objective: 100%
Goals	Person in Charge	Deadline	Resources

Goal 1 Inclusion of energy KPIs in the initial proposal for any process change	Energy Efficiency	December 2026	N/A
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Goal 2 Review and approval of the change only if energy efficiency has been taken into account (regardless of other requirements)			
Goal 3 Monitoring of improvements through the process change process changes and energy efficiency committee meetings			

Table 25: Energy Consumption Objective

Implementation of Energy Efficiency in the plant's main processes Improvement of Energy Efficiency in the various activities carried out in maintenance, plant operations, and projects Internal code: EE-2026-SP-OBJ-01	Associated Indicator: Number of meetings	Annual Target: 100% of the plan	
Targets	Person in Charge	Deadline	Resources
Goal 1: Plan and convene meetings to monitor ongoing or future actions that are in some way related to energy efficiency Goal 2: Hold regular meetings and review ongoing or future actions Goal 3: Hold regular meetings and review ongoing or future actions	Energy Efficiency	December 2026	N/A

Table 26: Objective: Operational and Technological Development

Projects for improvements to facilities, operational performance, and technology Improve process safety technology and increase automation, energy efficiency, and productivity. Meet project objectives Internal code: ENG-2026/2025/2024/2023-ROA-, ENG-2026/2025-SP-OBJ-2, ENG-2026/2025-SP-OBJ-2, OBJ-1, PM-2026/2025-Others-OBJ-1 / EE-2026/2025-RO-OBJ-2	Associated indicator: % Progress	Annual Target: 100% of the plan	
Targets	Responsible Party	Deadline	Resources
Goal 1 Replacement of the boiler's PLC (Programmable Logic Controller) Goal 2 Modification of the electrical installation for grinding line A Goal 3 Replacement of the cooling tower Goal 4 Replacement of the boiler room roof Goal 5 Replacement of the grinding B conveyor belt Goal 6 Replacement of the radioactive gantry Goal 7 Access platform between reactors 1, 2, and 3 Goal 8 Modification of the grinding plant in accordance with Strategic Plan 1/3 Goal 9 Automation of the reaction process Goal 10 Renovation of floors and facades Goal 11 Wi-Fi network Goal 12: Legalization of the low-voltage electrical installation	Engineering	December 2026	€3,085,000

Table 27: Objective: Improving Recycling and Environmental Performance

Improve the recycling process for salt slag and SPL to increase the business's competitiveness by achieving the milestones set out in the research lines. Advance knowledge of aluminum recycling processes in line with environmental requirements Internal Code: IDi-2026-2025-SP-OBJ-2; IDI-2026-2025-ROA-OBJ-2; IDI-2025-2024-ROA-OBJ-5; IDi-2026-2025-SP-OBJ-3	Associated indicator: % Progress	Annual Target: 100% of the plan		
Targets	Responsible Party	Deadline	Resources	
Goal 1: Development of scheduled milestones for the Hylnheat project Goal 2: Implementation of the SAL project to meet objectives Goal 3: Development of laboratory-scale and preindustrial-scale tests for the neutralization of NH3 at Paval	IDI	December 2026	55,000 €	

Table 28: Objective: Reduction of energy consumption and decrease in dust concentration during grinding

Adapting the grinding process to the new characteristics of salt slags; modifications to the grinding process to improve the handling of materials to be processed, reduce electricity consumption in secondary grinding by 20%, and keep dust generation below the emission limit value (ELV) Internal code: PM-2026-SP-OBJ-2	Associated indicator: Dust concentration Energy consumption, maintenance savings, maintenance	Annual Target Value: 20% Dust generation < OEL		
Goals	Responsible	Deadline	Resources	
Goal 1 Study to modify the storage system for salt slag from the cooler using the "hopper-to-hopper" concept, eliminating dust Goal 2 Reduction of ambient dust through a new hopper, fairing, and vacuum system for the metal conveyor belt, along with improvements to the vacuum system Goal 3: Replacement of one of the three secondary mills due to end of service life, resulting in energy and maintenance	Process	December 2026	CAPEX	

Table 29: Emissions Reduction Target

Increase the percentage of gas flared to reduce the percentage processed at the ammonium sulfate plant Reduce ammonium sulfate production Internal Code: PM-2026-SP-OBJ-3		Associated indicator:	Annual Target Value: 100% target achievement	
Targets	Responsible Party	Deadline	Resources	
Goal 1: Study the use of odor-capturing products through neutralization in a closed system (scrubber or similar). Goal 2 Installation of flow meters in each reactor and decanters 3 and 4 to monitor gas production by process	Process	December 2026	CAPEX	

5. Befesa's Environmental Performance.

The following section outlines the company's environmental performance.

All the indicators presented below are expressed as absolute and relative ratios (per metric ton of total waste processed).

5.1 Emissions to the atmosphere.

As specified in the Integrated Environmental Permit (AAI), the facility has 10 authorized emission sources, which are listed below:

- Source No. 1: Boiler A.
- Source No. 2: Boiler B.
- Source Nos. 3–6: Belt filter extraction—Rotary dryer—Scrubber (gas scrubber)
- Source No. 4: Flare stack
- Source No. 5: Exhaust from the bag filter of the salt slag grinding process.
- Focus No. 7: Exhaust from the aluminum slag grinding filter
- Focus No. 8: Sampling furnaces
- Focus No. 9: Scrap grinding
- Source No. 10: Diffuse ammonia emissions

Befesa Aluminio CT Valladolid complies with Royal Decree 100/2011, dated January 28, which updates the catalog of activities that may pollute the atmosphere and establishes the basic provisions for its implementation. The installation, layout, and dimensions of connections and access points are adequate for measurements and sampling. The results of the most recent inspection are entirely within the limits authorized by current regulations.

The results of the emissions measurements taken during 2025 are presented below, along with the emission limit values for the authorized sources. As part of Befesa Aluminio, S.L. CT Valladolid's self-monitoring system, more measurements are taken than those strictly required by the Integrated Environmental Authorization (AAI).

The data presented represent the average of the measurements taken in 2025; none of these measurements exceeded the limits specified in the IEA in effect at that time.

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



Table 30, Monitoring Point No. 1:

Parameter Evaluated	2020	2021	2022	2023	2024	2025	VLE
CO mg/Nm ³	<6.50	3.67	N/A*	5.15	N/A*	4.06	100
CO kg/t	4.77×10^{-6}	2.53×10^{-6}	N/A*	3.84×10^{-6}	N/A*	2.81×10^{-6}	N/A
NO _x mg/Nm ³ expressed as NO ₂	167.50	178.04	N/A*	81	N/A*	79.81	200
NO _x kg/t expressed as NO ₂	0.001	0.001	N/A*	0.00060	N/A*	0.00055	N/A

*Biennial frequency according to AAI

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

Table 31, Focus Area No. 2

Evaluated parameter	2020	2021	2022	2023	2024	2025	VLE
CO mg/Nm ³	<7.5	3.9	N/A*	4.13	N/A*	4.16	100
CO kg/t	5.51×10^{-6}	2.69×10^{-6}	N/A*	3.08025×10^{-6}	N/A*	2.88×10^{-6}	N/A
NO _x mg/Nm ³ (expressed as NO ₂)	68	98.66	N/A*	146.3	N/A*	146.51	200
NO _x kg/t expressed as NO ₂	4.99×10^{-4}	6.81×10^{-4}	N/A*	0.00109114	N/A*	0.00101445	N/A

*Biennial frequency according to AAI

- **Focus No. 3-6: Band Filter Extraction—Rotary Dryer—Scrubber**

Table 32, Focus No. 3-6:

Parameter evaluated	2020	2021	2022	2023	2024	2025	VLE
HCl mg/Nm ³	<0.1	0.10	0.10	0.19	0.016	0.029	230
HCl kg/t	7.34×10^{-7}	7.35×10^{-7}	6.31×10^{-7}	1.44×10^{-6}	1.08×10^{-7}	2.00E-07	N/A
NH ₃ mg/Nm ³	9.70	0.4925	0.058	0.227	0.152	0.157	10*
NH ₃ kg/t	7.12×10^{-6}	3.42×10^{-6}	3.66×10^{-7}	1.69×10^{-6}	1.02×10^{-6}	1.08E-06	N/A
pH ³ mg/Nm ³	N/A	0.024	0.023	0.024	0.438	<0.047	0.5
pH ₃ kg/t	N/A	1.70×10^{-7}	1.45×10^{-7}	1.78×10^{-7}	2.96×10^{-6}	<3.25E-07	N/A
SH ₂ mg/Nm ³	N/A	0.21	0.18	0.183	0.109	<0.127	2*
SH ₂ kg/t	N/A	1.45×10^{-6}	1.13×10^{-6}	1.36×10^{-6}	7.37×10^{-7}	<8.79E-07	N/A
Particles mg/Nm ³	-	0.97	0.71	0.04	0.51	0.68	5*
Particles kg/t	N/A	6.70×10^{-6}	4.48×10^{-6}	3.20×10^{-7}	3.45×10^{-6}	4.70×10^{-6}	N/A

* Annual frequency according to AAI

- **Focus No. 4: Torch**

No measurements are taken because it is not a requirement of the integrated environmental permit.

- **Source No. 5: Bag filter extraction for salt slag grinding.**



Table 33, Focus No. 5

Parameter Evaluated	2020	2021	2022	2023	2024	2025	VLE
Particulate Matter (PM ₁₀), mg/Nm ³	<1	0.66	0.45	0.36	0.46	0.25	5
Particulate Matter (PM ₁₀), kg/metric ton processed	7.34×10^{-6}	4.56×10^{-6}	2.83×10^{-6}	2.68×10^{-6}	3.11×10^{-6}	1.73×10^{-6}	N/A

* Annual frequency according to AAI

- **Focus No. 7: Extraction of the aluminum slag grinding filter.**



Table 34, Focus Area No. 7

Parameter evaluated	2020	2021	2022	2023	2024	2025	VLE
Particulate Matter (PM ₁₀), mg/Nm ³	<1	N/A	1.47	0.50	0.58	0.35	5
Particulate Matter (PM ₁₀), kg/metric ton processed	7.34×10^{-6}	N/A	9.27×10^{-6}	3.72×10^{-6}	3.92×10^{-6}	2.42E-06	N/A

* Annual frequency according to AAI

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



Table 35, Focus No. 8

Parameter evaluated	2020	2021	2022	2023	2024	2025	VLE
Particulate Matter (PM ₁₀), mg/Nm ³	<1	1.55	<0.59	3.27	2.4	4.52	5
Particulate Matter (PM ₁₀), kg/metric ton processed	7.34×10^{-6}	1.07×10^{-6}	3.723×10^{-6}	2.43×10^{-6}	1.62×10^{-6}	3.12×10^{-5}	N/A

* Annual frequency according to AAI

- **Source No. 9: Aluminum scrap grinding and extraction.**

Over the past four years (the period from 2022 to 2025), no emissions measurements have been taken for Source No. 9 (scrap aluminum grinding and extraction) because the facility has not been in use; this has been duly reported to the Regional Government of Castile and León.

- **Source No. 10: Diffuse ammonia emissions**

Table 36, Source No. 10

Parameter Evaluated	2020	2021	2022	2023	2024	2025	ELV
Average concentration (NH ₃) mg/Nm ³	-	-	0.091	0.109	0.080	0.223	10
Average points (NH ₃) kg/metric ton processed	-	-	5.76×10^{-3}	8.15×10^{-7}	5.37×10^{-7}	1.54×10^{-6}	NA

* Annual frequency according to AAI

Air containing NH₃, originating from the Paval drying process as well as from the exhaust system of the production facility, is directed to the three scrubbing towers, where it is treated by scrubbing with sulfuric acid (H₂SO₄).

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

In 2025, measurements were taken on a quarterly basis.



In summary, the **total** piped emissions (relating to authorized emission sources and measured in 2025) of CO, NO_x, Cl⁻, NH₃, SO₂, and PM were as follows:

Table 37: Emissions Summary

Parameter Evaluated	2020	2021	2022	2023	2024	2025
Particulate Matter (PM₁₀), kg	402	716	1,035	443.76	476.62	559.46
Particulate Matter (PM₁₀), kg/metric ton processed	0.003	0.005	0.007	0.003	0.003	0.003
NO₂ kg	4,466	4,795	4,576	2,774	2,276.81	2,934.66
NO₂ kg/metric ton processed	0.033	0.033	0.029	0.020	0.015	0.020
CO kg	160	99	94	176	144.63	132.62
CO kg/metric ton processed	0.001	0.0007	0.0006	0.0013	0.0009	0.0009
Cl⁻ kg	22	60	95	141	9.16	19.78
Cl⁻ kg/metric ton processed	1.61×10^{-4}	4.14×10^{-4}	5.99×10^{-4}	0.00105	6.19×10^{-6}	0.00013
NH₃ kg	2194	261	55	165	87.08	107.13
NH₃ kg/metric ton processed	0.016	0.002	0.0003	0.0012	0.0005	0.0007
PH₃ kg	-	12.65	21.76	17.48	250.93	32.07
pH₃ kg/t	-	7.98×10^{-6}	0.0001	0.0001	0.0016	0.0002
SO₂ kg	498	0	0	133.3	62.44	86.65
SO₂ kg/metric ton processed	0.004	0	0	0.00099	0.00042	0.0005

- Greenhouse Gas Emissions**

In 2025, an ISO 14064:2019 audit was conducted regarding the greenhouse gas (GHG) inventory. The verification process consisted of a systematic review of the GHG emissions generated by the organization. Befesa Aluminio's Valladolid facility submitted for verification the emissions falling under Categories 1 through 6, in accordance with the latest revision of the ISO 14064 standard, jointly with the plants of the Salt Slag Division, which also includes the salt slag recycling plants saline slag recycling plants located in Lünen (Germany) and Hannover (Germany). The verification was conducted by an independent verification body (**AENOR**).

With regard to annual greenhouse gas emissions, the total direct (Category 1) and indirect emissions from electricity (Category 2) at Befesa Aluminio's Valladolid facility were as follows:

Table 38: Emissions

Category 1	t of CO₂ eq TOTAL 2023	t of CO₂ eq TOTAL 2024	t of CO₂ eq TOTAL 2025
Mobile combustion	245.76	285.06	315.91
Stationary combustion	9,991.95	9,928.92	10,092.58
Process emissions	2,811.17	2,333.56	2,356.70
Total by Category 1	13,048.88	12,547.53	12,765.19
Category 2	t of CO₂ eq (CO₂)	t of CO₂ eq (CO₂)	t of CO₂ eq (CO₂)
Electrical energy	3,915.54	3,961.74	3,873.25
Thermal energy	-	-	-
Total by Category 2	3,915.54	3,961.74	3,873.25
TOTAL (Categories 1+2)	16,963.42	16,509.27	16,638.49

5.2 Noise.

The noise and vibrations emitted at the facilities are inherent to the operations of the industrial treatment plant, due to moving machinery and the movement of trucks transporting raw materials or products.

To assess noise emissions into the atmosphere, both current legislation and the frequency and emission limits established in the AAI (nighttime noise: 55 Laeq dB(A) and daytime noise: 65 Laeq dB(A)) were used as references.

Law 5/2009 of June 4, 2009, on noise in the Community of Castile and León, has also been taken into account. Article 13 of this law establishes that, in the event of corrections due to the presence of prominent tonal components, low-frequency noise, or impulsive noise, the limits shall be 5 dB(A) higher than the corresponding value in Annex I.

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

The results of the biennial noise measurements are as follows:

Table 39: Noise

Date May 15, 2023	Point A dB	Point B dB	Point C dB	Point D dB	Point E dB	Point F dB	VLE
Daytime	56.4	60.1	56.9	61.3	53.7	52.8	70 dB
Nighttime	55.7	52.8	58.2	55.4	55.4	54.8	60 dB
Date 05/30/2025	Point A dB	Point B dB	Point C dB	Point D dB	Point E dB	Point F dB	VLE
Daytime	69.5	60.2	52.4	66.1	56.2	57.5	70 dB
Nighttime	55.1	59.4	55.7	59.1	59.0	55.9	60 dB

The measurement points are shown on the following map:



5.3 Water

At Befesa Aluminio's Valladolid facility, water management is based on a collection and reuse system. All water generated during the production process, as well as rainwater and runoff, is collected through a system of tanks.

The recovered water is pumped back into the process, helping to meet part of the water consumption needs and reducing the amount of water drawn from the municipal water supply.

Municipal Water Consumption

Municipal water consumption in 2025 totaled 703 m³, used primarily for sanitary purposes and auxiliary services.

Table 40: Municipal Water Consumption

	Water m³ 2023	Water m³ 2024	Water m³ 2025
1st Quarter	155	156	160
2nd Quarter	168	164	167
3rd Quarter	164	164	161
4th Quarter	218	162	215
TOTAL (m³)	705	646	703

Stormwater Discharge

Excess stormwater is discharged into the Duero River drainage system, for which the necessary discharge permit has been granted by the Duero River Basin Authority. Control parameters are analyzed quarterly by an accredited agency.

The analytical results and a comparison with the limit values from recent years are as follows:

- **Monitoring Point 1: MP-1**

Table 41: PC1

Parameter	2020	2021	2022	2023	2024	2025	AAI Limit Value
pH	7.42	7.22	7.35	7.37	7.33	7.3	6–9
Aluminum	0.007	0.1	0.1	0.1	0.1	0.082	0.5 mg/L
Suspended solids (MES)	8.75	10	10	10	10	10	35 mg O ₂ /L
COD	39	46.75	54.75	36.5	30	30	125 mg O ₂ /L

The data in the table show the average of the four analyses conducted throughout the year. All of them fall within the established limits.

Regarding stormwater discharge, the total for 2025 was **15,749 m³**, which is within the limit of **31,500 m³** set forth in our Integrated Environmental Permit.

- **Monitoring Point 2: MP-2**

A septic tank with on-site filtration of sanitary wastewater is in place. This discharge is classified as “urban.”

Table 42: PC2

Parameter	2020	2021	2022	2023	2024	2025	AAI Threshold Value
BOD5	<15	34	19.75	21.75	<15	<15	60 mg O ₂ /L
COD	94	80	42.50	72.5	41.25	37.25	200 mg O ₂ /L
Suspended solids (MES)	33	28	7.25	23.5	9.3	10.15	90 g/L
pH	N/A	8	7.97	7.72	7.77	8	5.5–9.5 pH units

Quarterly checks are conducted. The data in the table show the average of the four annual analyses. All results fall within the established limits.

Taking into account the number of employees and average water consumption, the estimated discharge from the septic tank is **624.75 m³** compared to **990 m³** for the AAI.

$$\text{Estimated discharge} = T_m * C_m * d \text{ (2025)} \square 98 \times 28 \times 227.68 = 624.75 \text{ m}^3$$

- Tm: average number of workers = 98 workers
 - o **82 BEFESA workers**
 - o **16 regular contract workers**
- Cm: Average water consumption per person (excluding shower) = 128 L (Average household water consumption was 128 liters per inhabitant per day in 2022, according to INE, *) – 100 L (Average shower (approx. 5 minutes): Between 50 and 100 liters of water.) = **28 L**
 - o Data taken from the report “Statistics on Water Supply and Sanitation for the Year 2024” published in July 2024 by the National Institute of Statistics (INE) in 2022.
 - o The average water consumption for a shower, according to the WHO, is 100 L for 5 minutes.
- d (2025): Days worked in 2025 at the **Valladolid** Work Center = **227.68 days**
 - o Hours worked by in-house staff: 125,455 hours per year
 - o Hours worked by contractors: 53,048

hours Total: 178,504 / 8 hours (daily workday) =
227.68 days

5.4 Waste generation.

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

- **Hazardous waste generated during the year 2025:**

Table 43: RTP

Producer ID 07P01094700000009							
Hazardous waste AAI	Code LER	2020	2021	2022	2023	2024	2025
Used oil (t) Used oil (t) / t processed	130,205	1.70	2.86	1.77	1.45	1.85	2.83
		1.35×10^{-6}	1.97×10^{-6}	1.11×10^{-6}	1.08×10^{-6}	1.25×10^{-6}	1.95×10^{-6}
Aerosols (t) Aerosols (t) / t processed	160504	0	0	0.055	0.03	0.01	0
		0	0	3.47×10^{-7}	2.23×10^{-7}	6.76×10^{-8}	0
Containers with hazardous substance residues (t) Containers of hazardous substance residues (t) / t processed	150110	14.32	0.6	0.420	0.29	0.31	0.22
		1.05×10^{-6}	4.14×10^{-6}	2.65×10^{-6}	2.16×10^{-6}	2.09×10^{-6}	1.52×10^{-6}

Absorbents, filtration materials (t)	150202	3.10	6.97	4.7	2.55	8.61	2.15
		2.28 × 10 ⁻⁶	4.81 × 10 ⁻⁶	2.97×10 ⁻⁶	1.90 × 10 ⁻⁶	5.82 × 10 ⁻⁶	1.48×10 ⁻⁶

Absorbents, filtration materials (t) / t processed							
Oil filters (t) / t processed	160,107	0.07	0.12	0.04	0.12	0	0.35
Oil filters (t) / t processed		5.14×10^{-7}	1.38×10^{-6}	2.52×10^{-7}	8.94×10^{-7}	0	2.42×10^{-6}
Chemicals (t) / t processed	160,506	0.02	0.04	0.015	0.015	0.39	0.17
Chemicals (t) / t processed		1.47×10^{-7}	8.29×10^{-7}	9.46×10^{-8}	1.11×10^{-7}	2.63×10^{-6}	1.17×10^{-6}
Fluorescent tubes (t) / processed t	200,121	0.13	0	0.01	0.135	0.01	0.01
Fluorescent tubes (t) / processed t		9.54×10^{-7}	0	6.31×10^{-8}	1.006×10^{-6}	6.76×10^{-6}	3.46×10^{-6}
Batteries (t) / t processed	200,133	0	0.040	0	0	0	0.04
Batteries (t) / t processed		0	2.76×10^{-4}	0	0	0	2.76×10^{-7}
Non-halogenated organic solvent (t) / t processed	120,301	1.2	1.4	1.4	1.2	1.35	1.05
Non-halogenated organic solvent (t) / t processed		8.81×10^{-6}	9.67×10^{-6}	8.83×10^{-6}	8.94×10^{-6}	9.13×10^{-6}	7.27×10^{-6}
Grinding dust (t) / metric ton processed	100,321	427.29	0	0	1.45	0	0
Grinding dust (t) / metric ton processed		3.14×10^{-3}	0	0	1.08×10^{-5}	0	0
RAES (t) / processed t	191,202					1.08	0
RAES (t) / processed t						7.30×10^{-6}	0
Acid solutions (t) / processed t	60,106					0.18	0
Acid solutions (t) / processed t						1.21×10^{-6}	0
Piles (t) / t processed	200,133						0.03
Batteries (t) / t processed							1.73×10^{-7}
Total (t)		447.83	12.03	8.42	5.79	13.79	6.84
Total (t) / t processed		0.0031	8.3×10^{-4}	5.31×10^{-6}	4.31×10^{-6}	9.33×10^{-6}	4.74×10^{-6}

- Non-hazardous waste generated in 2025:

Table 44: Non-Hazardous Waste

Producer ID 07P03204700000009							
Non-AAI	Code LER	2020	2021	2022	2023	2024	2025
Construction Waste (CW) (t)	170,107	10.28	8.98	0	0	0	0
Construction Waste (CW) (t) / t processed		7.55×10^{-5}	6.20×10^{-5}	0	0	0	0
Cardboard and paper (t)	150,101	2,760	2.26	2.34	2.54	5.62	3.14
Cardboard and paper (t) / processed t		2.03×10^{-5}	1.56×10^{-5}	1.48×10^{-5}	1.86×10^{-5}	3.80×10^{-5}	2.17×10^{-5}
Wood (t)	150,103	8.10	9.24	8.20	7.08	11.54	12.12

Wood (t) / t processed		5.95×10^{-6}	6.38×10^{-6}	5.17×10^{-6}	5.28×10^{-6}	7.80×10^{-6}	8.39×10^{-6}
Scrap (t)	191,202	1,671.98	1,785.56	1,838.00	1,279.64	1,257.40	1,204.65

Scrap (t) / t processed		1.23×10 ⁻³	0.012	0.11	0.009	0.0085	0.0083
Septic tank sludge (t)	200304	67.44	66.92	64.3	52.5	51.66	63.94
Septic tank sludge (t) / metric ton processed		4.95 × 10 ⁻⁴	4.62 × 10 ⁻⁴	4.00 × 10 ⁻⁴	3.91 × 10 ⁻⁴	3.49 × 10 ⁻⁴	0.0004
Plastic (t)	150,105				4.16	13.88	5.96
Plastic (t) / t processed					3.10 × 10 ⁻⁵	9.39 × 10 ⁻⁵	4.12E-05
Composite packaging (MSW) (t)	150,105					13.32	17.18
Composite packaging (MSW) (t) / t processed						9.013×10 ⁻⁵	0.00011
Textile packaging (t)	150,109					17.28	9.82
Textile packaging (t) / processed t						0.00011	6.79E-05
GOMAS(t) composite containers	150,105					12.80	15.98
GOMAS composite packaging (t) / t processed						8.66 × 10 ⁻⁵	0.00011
Out-of-specification aluminum oxides (t)	100,330					454.66	448.98
Out-of-specification aluminum oxides (t) / t processed						0.0030	0.0031
Plastic-contaminated granular waste (t)	191002					620.88	0
Plastic-contaminated granular waste (t) / t processed						0.0042	0
Triage File	200101						0.24
							1.66×10 ⁻⁶
Mixed Packaging Packaging Recycling (RS) Household	150106						5.08
							3.51×10 ⁻⁵
Paper and cardboard packaging RS from PC	150101						4.20
							2.90 × 10 ⁻⁵
RAE	200136-42						0.92
							6.33×10 ⁻⁶
Total (t)		1,760	1,873	1,913	1,315	2,459.04	1,792.21
Total (t) / processed t		0.011	0.013	0.012	0.0098	0.016	0.0124

All waste generated has been delivered to authorized waste management companies for treatment and/or disposal.

During 2025, the company sought out authorized waste management operators that met the workplace's needs, including one for managing electronic waste as non-hazardous, recoverable waste and another for managing plastic and cardboard packaging as municipal

solid waste, and signed an agreement with a national SCAP.

Table 45: RTP Balance

Hazardous Waste	2023	2024	2025	%
Total (t)	5.79	13.79	6.84	-50
Total (t/t processed)	4.31×10^{-6}	9.33×10^{-6}	4.73×10^{-6}	-49

Table 46: Non-Hazardous Waste Balance

Nonhazardous waste	2023	2024	2025	%
Total (t)	1,341.72	2,459.04	1,792.21	-27
Total (t/t processed)	0.010	0.016	0.012	-25

Both hazardous and non-hazardous waste generation have decreased at the Valladolid Work Center, largely due to the completion of the cleanup of the old, disused facilities in 2024.

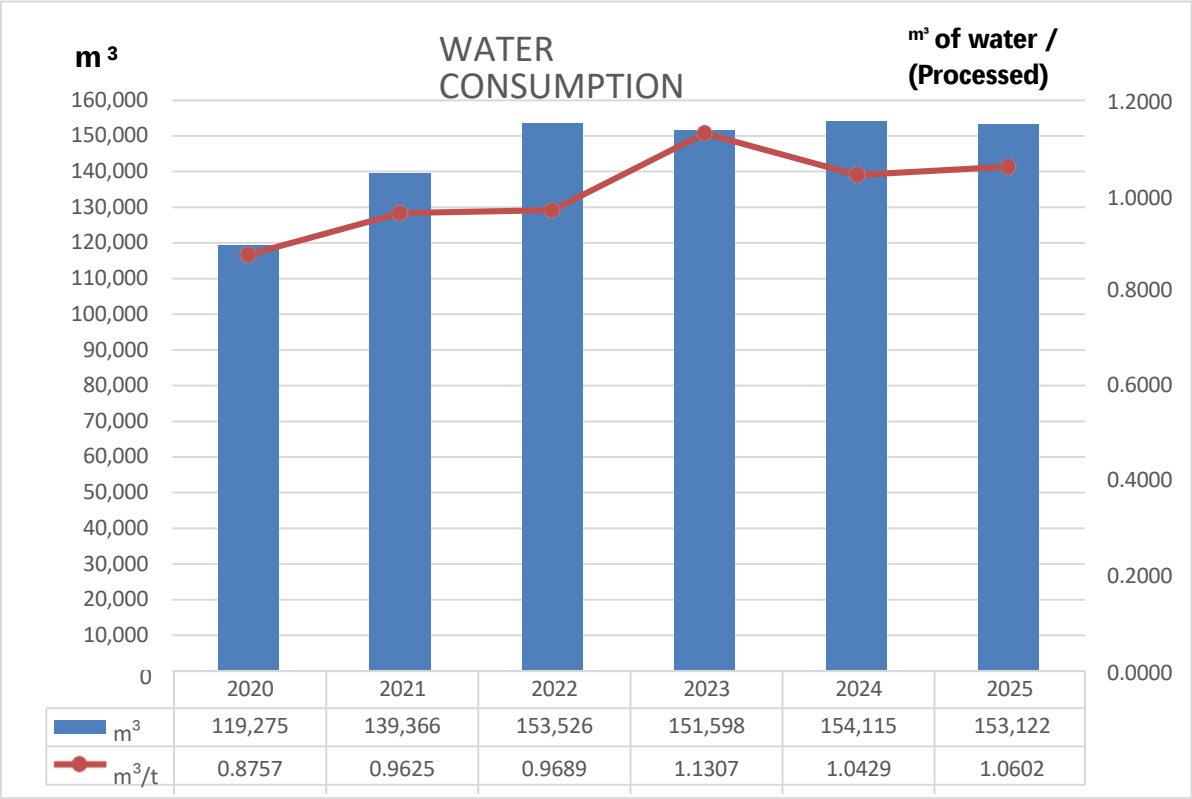
An awareness campaign led by ECOEMBES was carried out, during which an Internal Waste Plan (PIR) was implemented, involving the installation of various containers in the waste-generation area and facilitating recycling in production areas.

Most of the waste has been managed through a “R” recovery or recycling operation, preventing it from ending up in landfills without being recycled.

6. Basic environmental indicators.

6.1. Water consumption.

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



The amount of water used was **153,122 m³**

On October 16, 2023, the Water Quality Department approved the request to increase the water intake flow rate to **165,600 m³**.

In 2025, work continued within the production process to optimize water consumption at the plant, using only well water (raw water) to wash the Paval in the belt filters, and this water is recirculated to fill the reactors in the dissolution process.

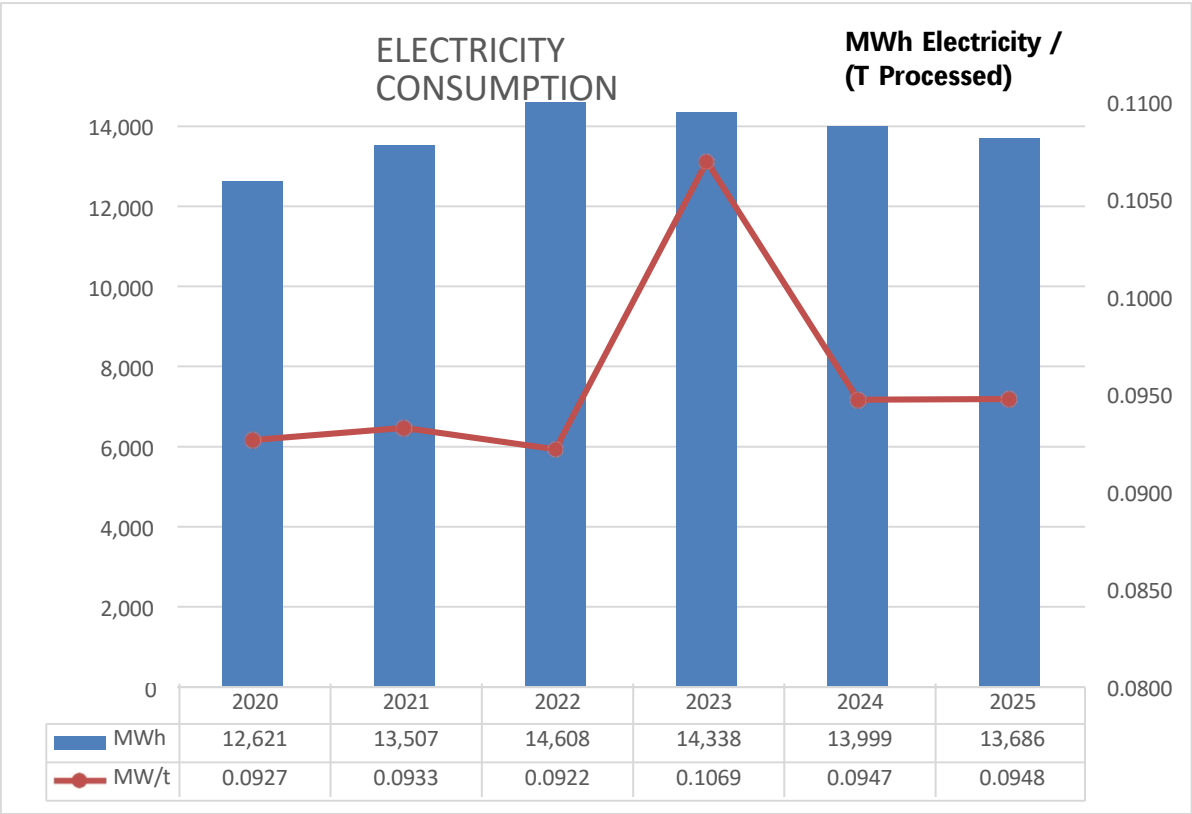
6.2. Energy consumption.

The primary fuel at Befesa Aluminio S.L. CT Valladolid is natural gas, which is used in the steam-generating boilers.

Electricity is used to power the motors for pumps, mills, conveyor belts, fans, etc., as well as to control the entire facility.

Diesel is used as fuel for internal transport vehicles (loaders and forklifts), heating, and nitrogen for reactor inerting.

- **Electricity:** Total electricity consumption in recent years per metric ton processed has been as follows



Electricity consumption decreased in absolute terms in 2025 due to the installation of new equipment in the grinding area, which allows fine material to pass directly into the hoppers, thereby avoiding the need for this material to go through the entire mechanical process of the facility. As a result, it has been possible to operate with only two secondary mills instead of the three originally installed.

This improvement was implemented during the August shutdown, and the system was commissioned in September 2025; therefore, the results were only reflected in the last quarter of 2025.

No energy is generated at the CT Valladolid facility from renewable energy sources; the amount of renewable energy produced by the facility is 0 MWh.

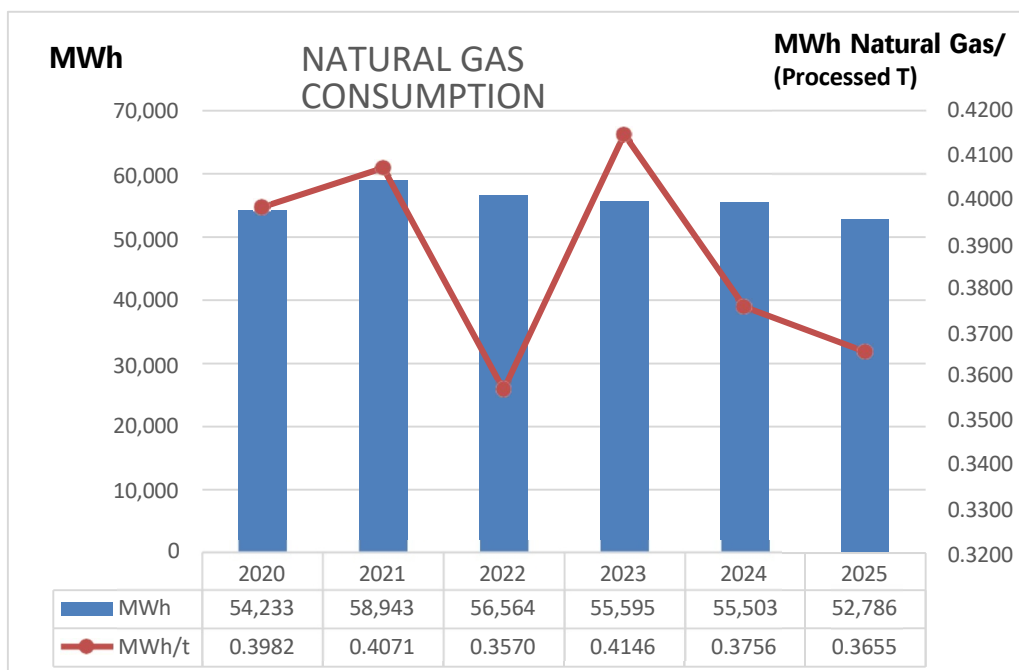
The energy purchased by the organization from renewable energy sources accounts for **12.5%** of its annual consumption in **2025**.

The origin of the purchased electricity is verified by the breakdown of the energy production mix corresponding to the energy sold by the utility company, as presented on each bill.

Table 47: Renewable Energy Consumed

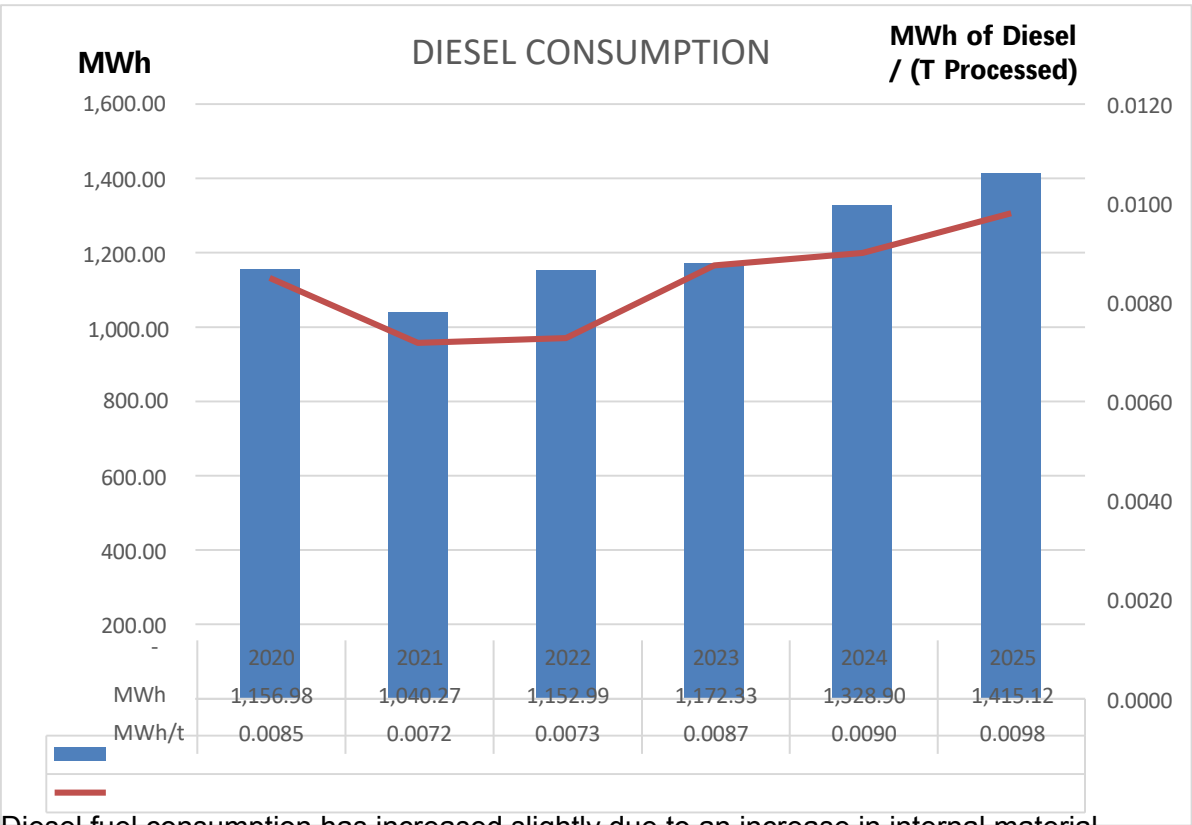
Renewable energy consumed			
Year	% Renewable energy consumed	MWh	MWh / metric ton processed
2020	14	1,798	0.013
2021	19	2,613	0.018
2022	26	3,739	0.024
2023	31	4,445	0.023
2024	6.9	944.75	0.006
2025	12.5	1,697	0.011

- **Natural gas:** Natural gas consumption in MWh per metric ton processed over the last 5 years is as follows:



Gas consumption per metric ton of treated slag has been reduced thanks to preventive maintenance on the boilers, improvements in crystallization control in the evaporators, and more frequent cleaning of the heat exchangers, which improves equipment performance.

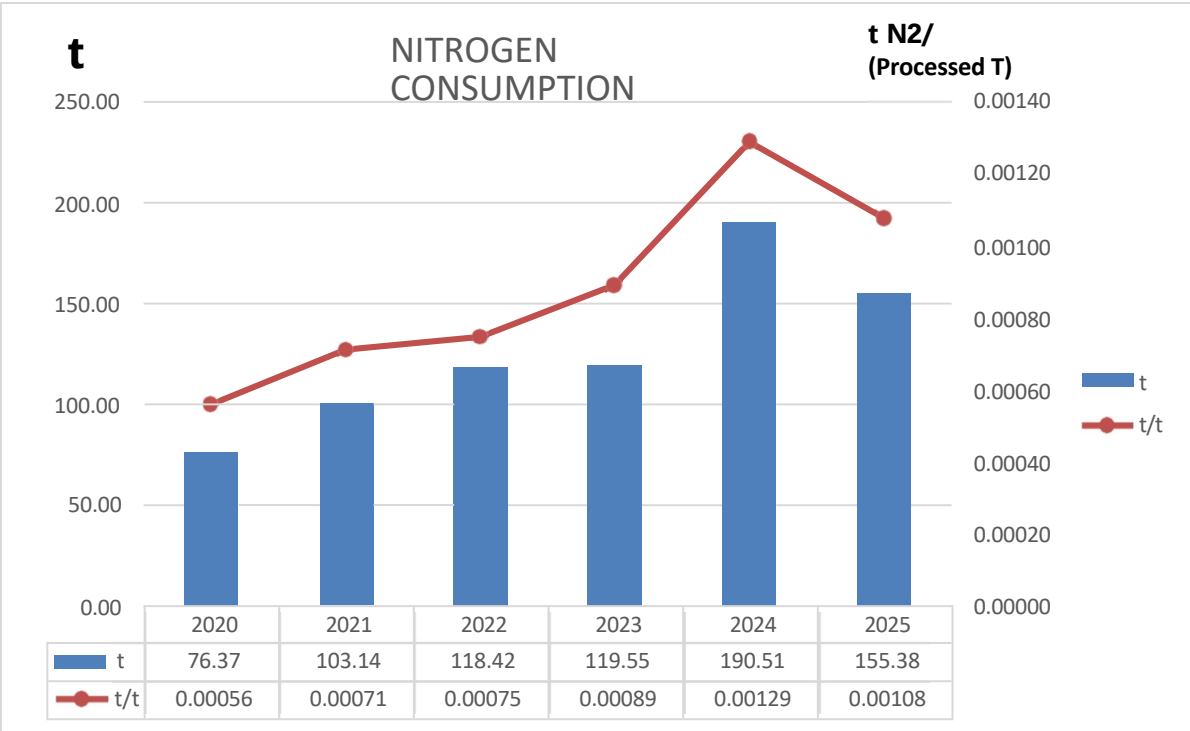
- **Diesel fuel:** As noted above, diesel fuel is used primarily for heating offices and as fuel for mobile equipment (loaders, forklifts, etc.). Consumption figures for the last six years are shown below:



Diesel fuel consumption has increased slightly due to an increase in internal material movements within the facility between the storage warehouses and the production area.

6.3. Nitrogen consumption.

Nitrogen is used for the inerting of equipment.

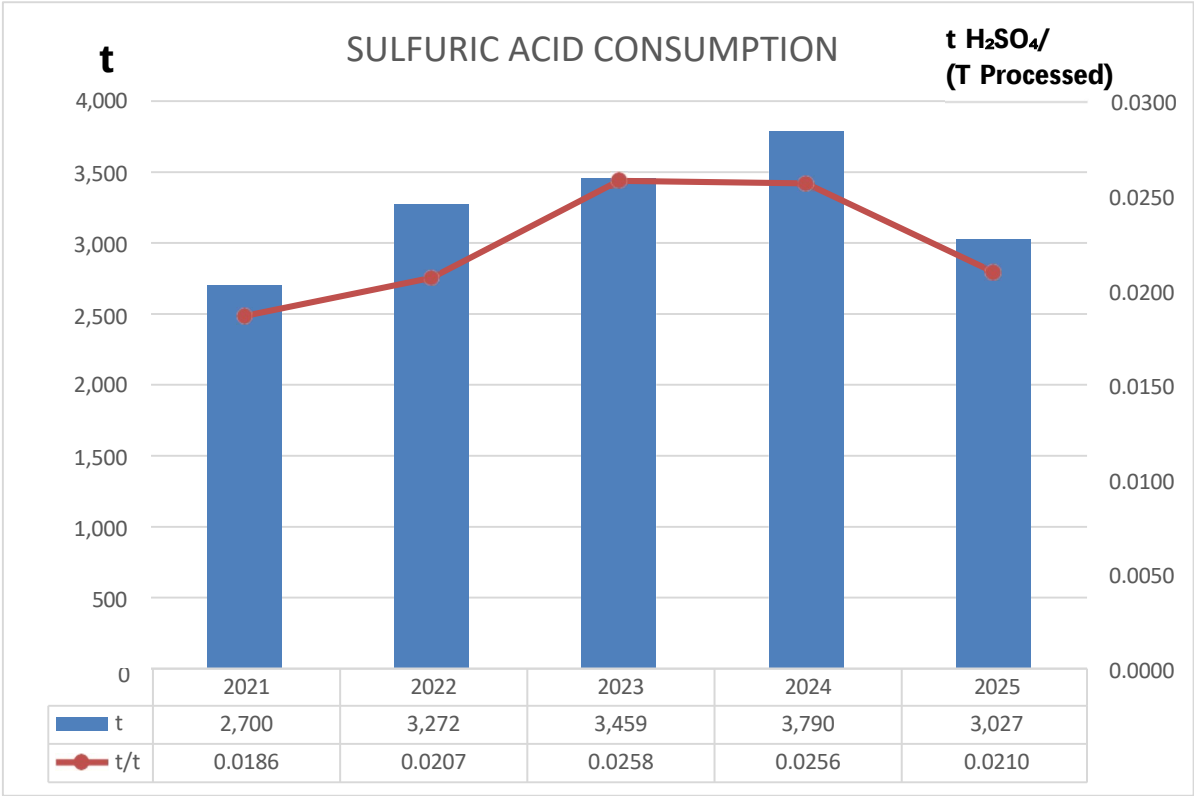


Nitrogen consumption has decreased due to the fact that fewer equipment inerting operations have been required, as well as the identification and repair of leaks in the plant.

6.4. Sulfuric Acid Consumption

Sulfuric acid is used in the gas scrubber area to treat the process gases from ammonium sulfate production.

Sulfuric acid consumption per metric ton of processed salt slag in recent years has been as follows:



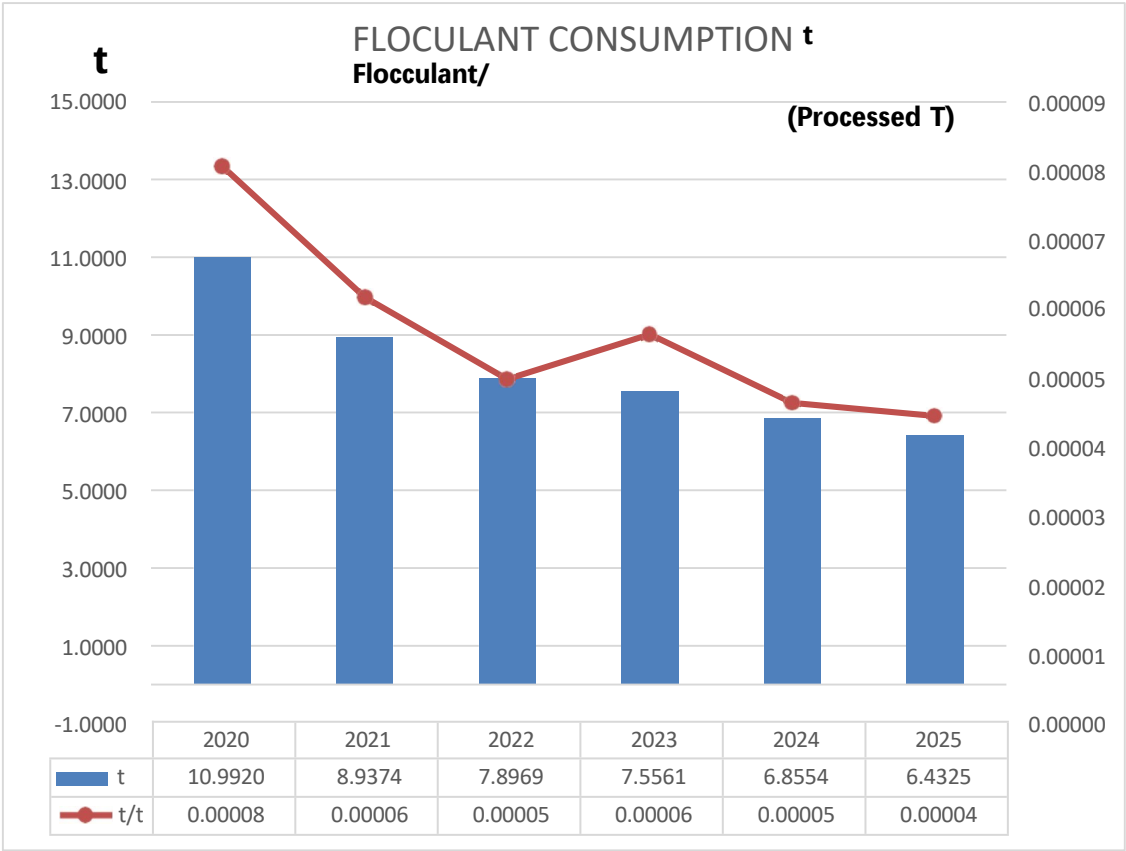
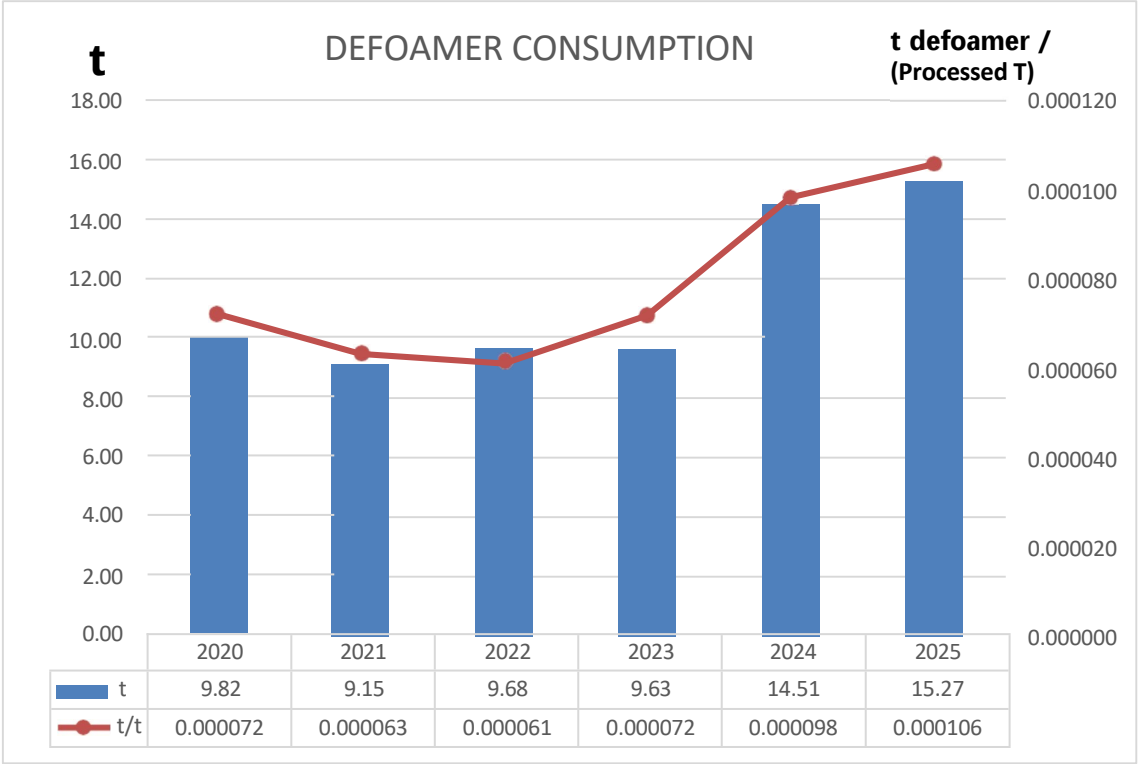
Since there has been a slight decrease in the tonnage of treated waste, less ammonia has been produced, resulting in a significant decrease in sulfuric acid consumption compared to the previous year.

6.5. Additive Consumption

The additives used in the process are:

- Flocculant: used in solution for the settling of solids.
- Defoamer: to reduce foam formation in solution.

The average additive consumption (in metric tons) per metric ton of processed salt slag in recent years has been:



Both defoamer and flocculant consumption remain within normal and consistent ranges, bearing in mind that their use varies slightly depending on the nature of the waste received from customers.

6.6. Biodiversity.

The following table details the breakdown of floor area at the Befesa Aluminio Valladolid Facility.

Table 48: Biodiversity

Land Use	2022		2023		2024		2025	
	Usable area (m ²)	Usable area (m ² /t processed)	Usable area (m ²)	Useful area (m ² /t processed)	Usable area (m ²)	Effective area (m ² /t processed)	Useful area (m ²)	Effective area (m ² /t processed)
Total use (buildings)	38,757.37	0.244	38,757.37	0.289	38,757.37	0.262	38,757.37	0.268360095
Total Sealed (Waterproof) Area	97,500.00	0.615	97,500.00	0.727	97,500.00	0.659	97,500.00	0.675100226
Total area in the center, classified by type	0	0	0	0	0	0	0	0
Total area outside the center oriented according to type	0	0	0	0	0	0	0	0
Total occupancy of the facilities	136,257.37	0.673	136,257.37	1,016	136,257.37	0.92	136,257.37	0.943460321

The total area occupied by the facilities is 106,700 m². There is no impact on biodiversity, and neither the site nor the surrounding area is considered a special protection area.

7. Compliance with Legal Requirements and Other Requirements Undertaken by the Organization

With regard to compliance with applicable legal requirements and other requirements adopted by the organization, the applicable regulations are detailed below:

Integrated Environmental Authorization

Royal Legislative Decree 1/2016, dated December 16, regulates integrated pollution prevention and control by requiring an **Integrated Environmental Permit (IEP)**. This permit consolidates all environmental permits and mandates the application of **Best Available Techniques (BAT)**, ensuring a high level of environmental protection in industrial activities.

At the end of 2020, Order FYM/1088/2020, dated October 13, was published regarding the review—to bring them into compliance with BAT and waste regulations—of the companies “Befesa Aluminio, S.L.” and “Befesa Aluminio, S.L.U.”; to Non-Substantial Modification No. 17 (MNS17) of

“Befesa Aluminio, S.L.U.”; and to the consolidation of the environmental permits for the plants treating and recovering scrap metal, aluminum waste, and salt slag, located within the municipality of Valladolid, belonging to both companies, under “Befesa Aluminio, S.L.U.” as the sole permit holder. The order limits its effects to the review and adaptation of the integrated environmental permit (IEP) to best available techniques (BAT), the incorporation of Non-Substantial Modification 17 (NSM17), and the consolidation of the environmental permits held by Befesa Aluminio, S.L.U. The implementation of the amendments set forth in this order will take effect during the first four months of 2021.

ORDER FYM/1007/2021, dated August 27, amending Order FYM/1088/2020, dated October 13, regarding the review and adaptation to BAT and waste regulations of the companies “Befesa Aluminio, S.L.” and “Befesa Aluminio, S.L.U.”, as well as Non-Substantial Modification 17 (MNS17) of “Befesa Aluminio, S.L.U.”, and the consolidation of the environmental permits for the plants treating and recovering scrap metal, aluminum waste, and salt slag, located within the municipal boundaries of Valladolid, belonging to both companies, under “Befesa Aluminio, S.L.U.” as the sole holder, as a result of Non-Substantial Modification No. 18 (MNS 18). 043-21-MNSVA

- Installation of a new reactor to serve as a backup to maintain production rates during cleaning, shutdowns, and maintenance 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 therein, as well as to improve the quality of the aluminum concentrates obtained in this part of the process.

ORDER MAV/1027/2022, dated August 3, amending Order FYM/1088/2020, dated October 13, regarding the review—for adaptation to BAT and waste regulations—of the companies “Befesa Aluminio, S.L.” and “Befesa Aluminio, S.L.U.”, as well as non-substantial amendment 17 (MNS17) for “Befesa Aluminio, S.L.U.”, and the consolidation of the environmental permits for the plants treating and recovering scrap metal, aluminum waste, and salt slag, located within the municipal boundaries of Valladolid, belonging to both companies, under “Befesa Aluminio, S.L.U.” as the sole holder, as a result of non-substantial modification 19 (MNS 19). 027-22-MNSVA

- Expansion and modification of the collection system currently installed in the aluminum oxide storage facility (Paval), through the replacement and expansion of the existing hood, along with the new installation of two adjacent hoods, thereby increasing storage and collection capacity.
- Increase in the treatment capacity of the gas scrubbers through the installation of new packing material and the expansion of the contact/scrubbing surface area, which will improve the system’s efficiency from 95% to 97.5%.

In 2025, non-substantial modification 20 (MNS20) was submitted to the Regional Government of Castile and León; it is currently pending resolution and publication in the Official Gazette of Castile and León (BOCYL).

Emissions:

Royal Legislative Decree 1/2016, dated December 16, approving the consolidated text of the Law on Integrated Pollution Prevention and Control.

- ✓ Submitting the measurements taken in 2025 to the Regional Government of Castile and León, along with the limits established in the corresponding Integrated Environmental Authorization (AAI).

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

- ✓ Reporting all emissions and waste data to the PRTR Registry of the Ministry for Ecological Transition and the Demographic Challenge during the month of February 2025.

Royal Decree 203/2024, dated February 27, which sets forth provisions regarding the free allocation of emission allowances for the years 2026–2030 and other aspects related to the exclusion regime for facilities effective from 2026.

- ✓ The activity is exempt from reporting and trading of GHG emission allowances.

Noise and Vibrations:

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

Submission of a technical report on biennial measurements certifying technical compliance with noise levels, with the most recent report submitted in May 2025 and found to be in compliance at all measurement points.

Waste:

Law 7/2022, of April 8, on Waste and Contaminated Soil for a Circular Economy

- ✓ Compliance with this Law regarding all waste generated and processed at the facilities.

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

- ✓ Compliance with the established requirements regarding the shipment of waste.

Registration in the Registry of Hazardous and Non-Hazardous Waste Managers under numbers 7G04084700000009 and 07G01964700000009, respectively, and registration in the Registry of Hazardous Waste Producers under number 07P01094700000009

- ✓ Submission in February 2026 of both the annual report for the waste manager and the annual report for the waste generator for the year 2025.
- ✓ The waste minimization study for the 2023–2026 period has been submitted. A new study will be submitted by the end of December 2026 for the 2027–2030 period.

Royal Decree 646/2020, dated July 7, regulating the disposal of waste through landfilling.

- ✓ In compliance with the aforementioned decree.

REGULATION (EU) 2024/1157 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 11, 2024 on shipments of waste

- ✓ Waste generated at the worksite is managed within the national territory; therefore, no cross-border waste shipments take place.
- ✓ The workplace receives cross-border waste in compliance with the provisions of the regulation.

Soil:

Royal Decree 9/2005, dated January 14, establishing the list of activities that may contaminate soil and the criteria and standards for declaring soil contaminated.

- ✓ The soil report is dated December 11, 2025. It is updated whenever there is a change in land use, an expansion, or at the request of a stakeholder, or at least every five years.
- ✓ In June 2019, a detailed analytical characterization of the subsoil was conducted at the Befesa Aluminio CT Valladolid facility. Contamination of the subsoil by hydrocarbons was found that was not related to any source of contamination at the site, but rather to a historical accidental spill that occurred prior to the paving of the lot. Since soil concentrations exceeded the generic reference levels (GRLs) established by said legislation, a Quantitative Risk Assessment (QRA) was conducted. This report concluded that, after analyzing possible current and future scenarios at the site and in the surrounding area, there is no unacceptable risk to human health arising from the existing soil contamination at the site.
- ✓ On July 16, 2020, the Regional Government of Castile and León issued the "Notice of Acceptance of the Soil Status Report pursuant to Royal Decree 9/2005."

Energy Efficiency:

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

- ✓ The energy audit report is submitted on July 11, 2025.

Environmental Liability:

Law 26/2007, of October 23, on Environmental Liability, and Order ARM/1783/2011, of June 22, which requires that, by October 31, 2018, the establishment of a financial guarantee be reported to cover the environmental liability inherent in the company's activity, should such liability become enforceable.

Royal Decree 2090/2008, dated December 22, approving the regulations partially implementing Law 26/2007.

Law 11/2014, dated July 3, amending Law 26/2007, dated October 23, on environmental liability.

Royal Decree 183/2015, dated March 13, amending the regulations partially implementing Law 26/2007, dated October 23, on Environmental Liability, approved by Royal Decree 2090/2008, dated December 22.

- ✓ On July 19, 2018, the affidavit establishing the financial guarantee was submitted to the Regional Government of Castile and León.
- ✓ A risk analysis report was prepared by an external firm. Based on the Environmental Risk Analysis (ERA) conducted, it can be concluded that, given the amount of the costs to repair the potential environmental damage that can be expected, within the framework of Law 26/2007 on Environmental Liability, there is no obligation to post a mandatory financial guarantee.
- ✓ In March 2022, a new environmental risk analysis and assessment report is prepared by an external firm, in accordance with one of the requirements of Annex III of the Environmental Conditions set forth in ORDER FYM/1088/2020. As in the previous report, it was concluded that there is no obligation to post a mandatory financial guarantee. This Risk Assessment will be reviewed upon the entry into force of the new Best Available Techniques (BAT).

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

- ✓ In compliance with the aforementioned decree.

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 through 10.

- ✓ In compliance with the aforementioned regulation.

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

- ✓ In compliance with the aforementioned regulation.

Legionella:

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

- ✓ Compliance with all operational notifications and maintenance procedures, in accordance with the new PPCL plans.

Petroleum facilities:

Royal Decree 2085/1994, dated October 20, approving the Regulations on Oil Facilities, along with subsequent amendments and the corresponding Supplementary Technical Instructions for implementation.

- ✓ The relevant periodic inspections of the facilities are carried out

Fire protection systems:

Royal Decree 164/2025, approving the Fire Safety Regulations for Industrial Establishments.

- ✓ Compliance with the requirements for industrial facilities in the event of a fire, as set forth in the latest update dated May 10, 2025

Electrical installations:

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

- ✓ Compliant with the established requirements regarding inspections.

Royal Decree 337/2014, dated May 9, approving the regulations on technical conditions and safety guarantees for high-voltage electrical installations and their technical instructions.

- ✓ Compliance with the established requirements regarding inspections.

Heating systems:

Royal Decree 1027/2007, which approves the Regulations on Thermal Installations in Buildings. The Royal Decree was drafted jointly by the Ministry of Industry, Tourism, and Trade together with the Ministry of Housing.

Royal Decree 178/2021, dated March 23, amending Royal Decree 1027/2007, dated July 20, which approves the Regulations on Heating Systems in Buildings.

- ✓ The heating systems in several areas of the workplace were registered in January 2017.
- ✓ The relevant periodic inspections of the systems are carried out

Royal Decree 390/2021, dated June 1, approving the basic procedure for certifying the energy efficiency of buildings.

- ✓ Registration in the registry of building energy efficiency certificates on June 3, 2024.

Freight transport:

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

- ✓ In compliance with its latest amendment from 2025, providing training on the subject to employees involved in this area

Water:

Authorization from the Duero River Basin Authority to discharge sanitary wastewater into the ground.

- ✓ Submitting the annual declaration report.
- ✓ Complying with the requirements of Royal Legislative Decree 1/2016, which approves the consolidated text of the Law on Integrated Pollution Prevention and Control.
- ✓ Submitting the measurements taken during 2025 to the Regional Government of Castile and León, in compliance with the limits established in the AAI.

Authorization has been obtained from the Duero River Basin Authority for direct discharge into the Pisuerga River via the Duero Canal outfall.

- ✓ Submitting the annual declaration report.
- ✓ On October 16, 2023, the terms of the groundwater use permit were amended with the Duero River Basin Authority, requesting a maximum annual volume of 165,600 m³.

Order FYM/1088/2020 establishes the effluent discharge limit at 31,500 m³ per year.

- ✓ Compliance with the newly established limits.

EMAS:

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

REGULATION COMMISSION REGULATION (EU) 2017/1505 of August 28, 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 of 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 Registry of organizations

participating in the Community eco-management and audit scheme in the Community of Castile and León.

Regulation (EC) No. 1221/2009 of the European Parliament and of the Council of November 25, 2009, on the voluntary participation of 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, establishing the rules for the implementation of Regulation (EC) No. 1221/2009 of the European Parliament and of the Council of November 25, 2009, on the voluntary participation of 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.

8. Communication and Participation in the Area of the Environment.

Befes Aluminio CT Valladolid has procedures in place for communication, consultation, and participation, which include aspects such as internal and external communication.

Throughout 2025, there were no penalties related to environmental issues nor any complaints from stakeholders.

To facilitate communication, consultation, and participation by employees and/or their representatives, the Valladolid facility carries out the following activities:

- **Works Council:** The works council, together with company management, meets periodically in accordance with current legislation. The minutes of these meetings are posted on the bulletin boards.
- **Investigations of accidents and environmental incidents,** resulting in “lessons learned” documents.
- **Whistleblower channel,** located on the Befesa website (www.befesa.com), through which anyone can anonymously report violations of the code of conduct.
- **Form for improvement opportunities and nonconformities:** managed through the continuous improvement procedure. This is the form used

by employees as a communication channel via the suggestion box.

- **Suggestion box:** A suggestion box is available to employees in the facility's cafeteria.

Throughout 2025, 41 suggestions for improvement were recorded; these are collected, analyzed, evaluated, and responded to by management. Two of them were environmental in nature.

Table 49: Environmental Suggestions

Code	SGI Aspect	Type	Date Identified	Description	Evidence
Suggestion for Improvement – Cold in the locker rooms and shower area	MA	AM	01/05/2025	Install additional radiators, identify where the cold air is entering, and insulate the area.	It was determined that the low temperature in the locker rooms was due to open windows. As an immediate corrective measure, the windows were closed.
Suggestion improvement — Lack of insulation so It's been a long time it's been cold winter and hot in summer in the workshops	MA	AM	11/10/2025	Improve insulation in the workshop and install climate control.	Improvements are planned for 2026 Install climate control in the workshops.

- **Toolbox talks:** a brief presentation to workers on a single aspect of HSQE.
- **5S:** 5S audits (order and cleanliness), governed by the corresponding technical instructions.

- **Informal meetings, which may be daily, weekly, or monthly,** in which, although employees do not participate directly, requests or suggestions are collected and reviewed and analyzed by process managers and shift supervisors.
- **Bulletin boards:** Employee participation is encouraged through the posting of contests and job openings, and information is provided to solicit suggestions for ongoing or planned projects
- **Psychosocial risk surveys:** Every two years, the company conducts a survey on psychosocial risks, and based on the results, an action plan is established if necessary.
- **Environmental brochure and documents on best environmental practices regarding waste management:** This is an informational document to help employees properly sort waste; if they have any doubts or questions, they can consult the environmental officer. It is provided to employees during the orientation training they receive on their first day of work.





- **Business Activities Coordination Document for Contractors:** This document informs contractors of the various environmental requirements that apply to the Valladolid worksite.
- **HSQE Bulletin:** Published both via email and on the plant's bulletin boards. Among other topics, it provides for employees aspects related to environmental objectives, consumption, and waste generated.
- **Integrated Environmental Permit:** Befesa holds an Integrated Environmental Permit published in the Official Gazette of Castile and León (BOCyL).

9. Other Relevant Activities in the Environmental Field.

In accordance with the ISO 14001:2015 standard and the European EMAS Regulation, Befesa Aluminio's Valladolid Work Site has undergone the corresponding environmental audits—both internal and external—to verify the proper functioning of the implemented environmental management system.

Conducting audits is a key element in verifying the proper performance of each of the management system's processes. When nonconformities are detected during the course of the audits, corrective actions are established to eliminate these nonconformities.

The program of internal and external audits was successfully completed throughout the year covered by this statement.

- Befesa Aluminio's Valladolid facility maintains a greenhouse gas inventory that has been externally verified in accordance with UNE-EN ISO 14064-1:2019. Greenhouse Gases—Quantification and Reporting of Greenhouse Gas Emissions and Removals (ISO 14064-1:2018).
- Since November 2016, the company has been certified under the ISO 50.001 standard for energy efficiency.
- In 2025, Befesa Aluminio's Valladolid facility obtained certification for its Environmental Product Declaration (EPD) from EPD International, under ISO 14025, for paval, and for the Life Cycle Assessment (LCA) of ammonium sulfate, under ISO 14067, by Bureau Veritas.
- Befesa belongs to and actively participates in the following associations:
 - Spanish Confederation of Metal Industry Organizations (CONFEMETAL), where it is an active member of the environmental committee.
 - Spanish Association of Special Waste Managers (ASEGRE): Brings together companies in Spain engaged in hazardous waste management.
 - Valladolid Metal Industry Association (VAMETAL)
 - European Aluminium: an association of the leading aluminum producers and recyclers in Europe.

- Befesa Aluminio S.L. regularly participates in regional, national, and European R&D&I programs in collaboration with various research centers, universities, and other prestigious institutions aimed at promoting and improving the recycling, recovery, and full utilization of waste from the aluminum industry.

Among the various projects currently underway, strategic initiatives such as the following stand out:

- **The HyInHeat Project** is advancing toward the decarbonization of smelting processes to produce secondary aluminum alloys by integrating hydrogen as an alternative fuel to fossil fuels.

The reduction of carbon dioxide emissions in the secondary aluminum industry will be achieved through the implementation of efficient hydrogen combustion systems covering nearly the entire process chain.

More information is available on the project's website: <https://hyinheat.eu/>



This project has received funding from the European Union's Horizon Europe research and innovation program under Grant Agreement No 101091456

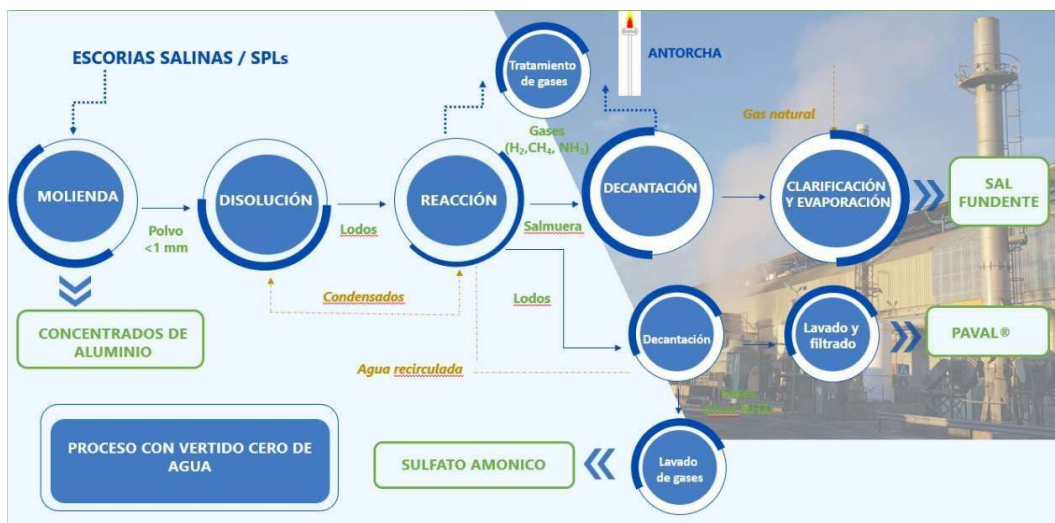
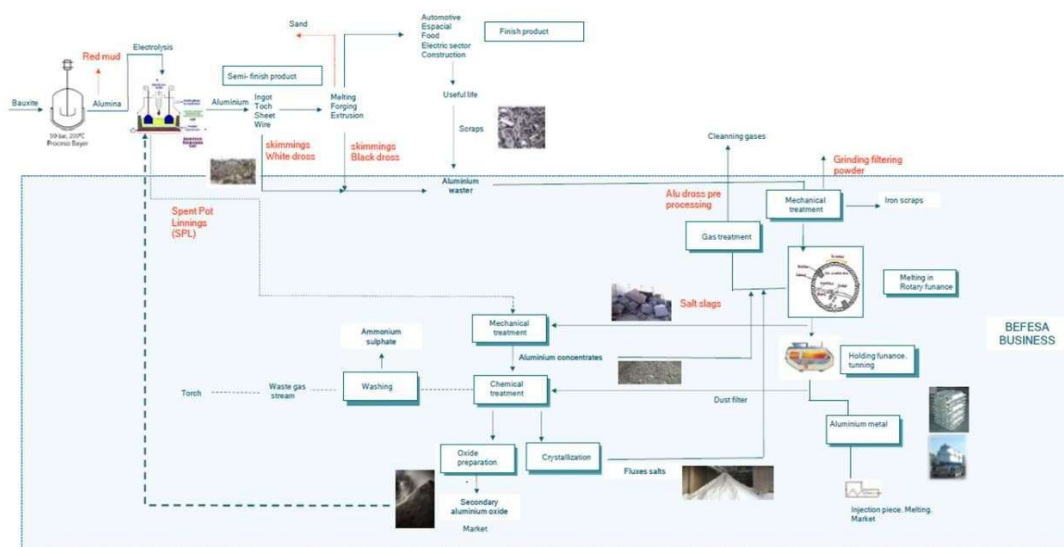
- **The Hydrogas Project** aims to purify, separate, and utilize the hydrogen and methane from the gas stream obtained during the recycling and recovery of saltworks slag. Through self-consumption, we will reduce dependence on natural gas in the steam boilers used in this same process.

This project completes the aluminum waste recycling cycle, making full use of the resources derived from the waste itself, thereby creating an energy-self-sufficient industry.



This project LIFE23-CCM-ES-LIFE-HYDROGAS has been funded by the LIFE 23 program under grant agreement number 101157282

- **The Ecoesc project** focuses on optimizing the recycling and recovery process for salt slag, with an emphasis on adding greater value to its recovered products and minimize their environmental impact. These advances will help reduce Europe's reliance on critical raw materials—such as alumina—and enhance circularity by producing secondary-melt alloys from recovered products, as well as directing flux salt and ammonium sulfate toward high-consumption industrial applications.



10. Upcoming Environmental Statement.

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

The next environmental statement will be issued in June 2027.

The environmental verifier validating this statement is Bureau Veritas Certification, a certification body accredited by ENAC under No. ES-V-0003, with its registered office at Avenida Europa, 1, Building B, Floor B, Parque Empresarial, Avenida Europa, 28108 – Alcobendas (Madrid).

This statement is valid for one year from the date of validation.



Digitally signed document. Bureau Veritas Iberia, S.L. EMAS Verifier No.: ES-V-0003 Environmental statement validated in accordance with Regulation (EC) No. 1221/2009, as amended by Regulations (EU) 2017/1505 and (EU) 2018/2026 2026.09.03 07:16:58 +02'00'