ence
ENERGÍA & CELULOSA

# SUSTAINABILITY REPORT

# 2025

*(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)*

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# 01 | GENERAL INFORMATION



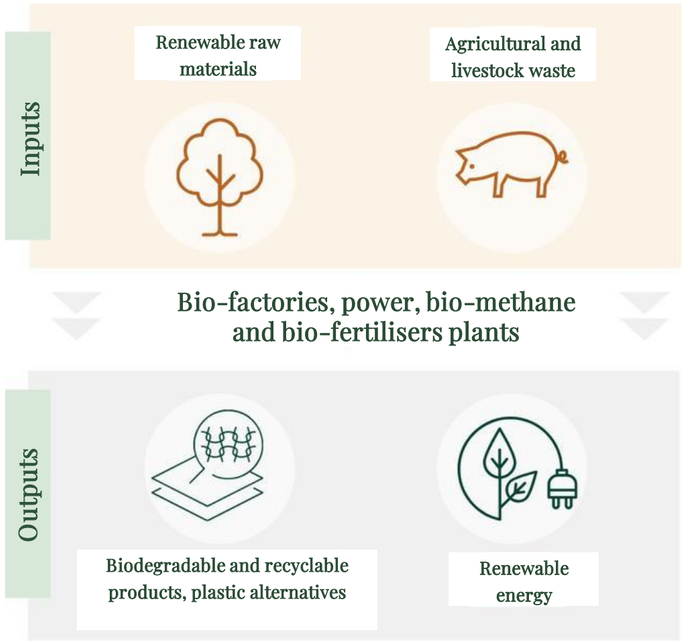
# 01

# GENERAL INFORMATION

## 1.1 Business model

**Bio-economy as a lever for decarbonisation**

Ence's business model is based on the use of renewable and local natural resources to manufacture pulp and high added-value bioproducts and generate green energy. Ence thus offers society renewable alternatives to replace materials from fossil sources and promotes the decarbonisation of the economy, in line with EU environmental objectives.




Ence's business model is circular, since most of the raw materials it uses (such as wood) are renewable, and in many cases, it re-uses by-products from other sectors, such as agricultural, forest and livestock biomass, thereby helping to make other value chains more circular too. This way, Ence not only contributes to closing production cycles in other value chains, but also offers solutions for the management of these by-products, thus avoiding adverse environmental impacts. Furthermore, the majority of the by-products generated in their industrial processes are recovered or reused as secondary raw materials in the same industrial operations or in other industries.

Ence's model is based on local resources, contributing to the generation of value and employment in the rural world and in the communities in which it operates, the company thus playing a very important role in the fight against depopulation and abandonment in rural areas, and in reindustrialisation and the fair transition. Also, most of its products are marketed in Europe, which limits the organisation's carbon footprint, and the company contributes to offering local alternatives, consolidating the European market.

## 1.2 Business lines

Ence applies its circular, proximity business model to four business lines, which all share the same vision: pulp production, sustainable forest management, renewable energy generation from biomass, bio-methane and bio-fertilisers production[1]. These four business lines are in turn grouped under two business units: Pulp and Renewables.

While pulp production is a cyclical business, dependent on the market price of the raw material, renewable energy generation is a business that is regulated or backed by long-term power purchase agreements, which provides greater visibility of revenues..

### 1.2.1 Pulp Business

#### 1.2.1.1 PULP PRODUCTION

With an installed capacity of 1.2 million metric tons per year, Ence is positioned as the European leader in eucalyptus pulp production and a benchmark in special short-fibre pulps. The pulp production activity is carried out in two bio-factories located in Navia (Asturias) and Pontevedra (Galicia), recognised for their excellence, operational flexibility and commitment to sustainability.

The pulp manufacturing process is a clear example of the circular bio-economy, as it is based on the transformation of a renewable resource such as wood into a biodegradable and recyclable raw material. Moreover, the main chemicals used in the process are also recovered and reused in a closed cycle, thus reducing the consumption of resources. As for the waste generated in the process, over 95% is recovered or reclaimed, which has earned Ence the AENOR "Zero Waste" certification at its two bio-factories.

The energy self-sufficiency of the process is achieved by using the non-cellulose fractions of the tree (biomass, bark and lignin) as a source of renewable energy in its generation and cogeneration facilities. This enables the plant's energy needs to be covered and the surplus to be exported to the electricity grid, consolidating Ence as a key player in the production of clean energy and in promoting the bio-economy in the regions where it operates.

On the other hand, Ence applies the best available technologies and focuses on the continuous improvement to move ahead in its environmental performance; this has earned the company sustainability labels with highly prestigious requirements, such as Nordic Swan and Ecolabel.

The pulp production activity also has a positive social impact, since by using local raw materials and promoting collaboration with local suppliers, Ence contributes to the economic and social development of the communities in which it is located. Ence's business thus generates wealth for numerous stakeholders, from the forest owners from whom it buys wood to suppliers, hauliers and silviculture and logging companies, most of which are local SMEs.

Ence's plants are located in areas with a high availability of certified eucalyptus plantations, which facilitates the responsible supply of local wood and represents a competitive advantage over other European producers that depend on imports or species with lower yields such as pine.
In 2025 Ence began manufacturing and marketing pulp for absorbent products, called fluff pulp at the Navia bio-factory. Fluff is a type of pulp that is used in many hygiene and absorbent products such as nappies, feminine hygiene products and incontinence protection products, among others. Ence Navia's fluff pulp is the first in Europe to be manufactured from eucalyptus wood, replacing imported fluff pulp made from long fibre.

1. Materials or products manufactured by Ence are not banned in any market. Furthermore, Ence's activities are not linked to the manufacture of weapons or chemical products, tobacco growing or production or to the fossil fuel sector (coal, oil and gas) in any part of its value chain — upstream (exploration, extraction, processing, refining, etc.), midstream (storage, transport) or downstream (distribution and sales). Ence does produce energy from fossil fuel in the form of natural gas, specifically the co-generation of heat and electricity from natural gas at the Lucena plant in the province of Córdoba, sales deriving from which are reported in chapter 2.1 Taxonomy.

Another key competitive advantage of Ence lies in its range of special products, designed to offer high added value and improve the environmental profile of its applications. These products can replace plastic alternatives and more expensive long-fibre pulp. For more details, see section *3.4 Clients* of this report.

Ence's geographical proximity to its European customers allows it to offer a "just in time" service, with delivery times of less than one week, compared to the more than five weeks required from Latin America. This logistical advantage contributes to reducing the environmental footprint of its clients' products.

#### 1.2.1.2 FOREST MANAGEMENT

To ensure its wood supply, Ence has its own supply team, highly spread around its bio-factories. Direct management of its forest assets reduces dependence on the market and ensures the traceability of these resources.

Ence is the leading private forest manager in Spain, managing over 65,500 hectares of forestland (mainly in the regions of Andalusia — through its subsidiary Silvasur — Galicia, Asturias and Cantabria — through its subsidiary Ence Terra). Although most of the woodlands are owned by Ence, some areas are also managed through agreements with private owners, neighbourhood woodland communities and local councils. The management of Ence's forestry assets provides raw materials for its other business lines (wood and biomass for cellulose production and renewable energy generation) and also provides wood for supply to third parties.

Ence's forestry management is geared towards the efficient and sustainable use of forest resources, positioning itself as a benchmark in good silvicultural practices. The company actively works to improve forest productivity and adapt woodlands to climate change through an integrated forest management system and a firm commitment to R&D&I focused on genetic[2] and silvicultural improvement, as well as pest and disease control. Ence is also committed to producing improved plants in its nurseries, both for its own forests and for sale to woodland owners. These improved plants, the result of years of research, are more productive and better adapted to the effects of climate change. In addition, Ence offers technical advice to forest owners to select the most appropriate species according to location and shares best practices to optimise silviculture and forest management (for more information on the advisory services Ence offers to forest owners, see ***3.3 Affected communities***).

Ence also promotes the conservation of biodiversity and other ecosystem services, encouraging sustainable forest management certification through internationally recognised standards such as FSC® (Forest Stewardship Council®, licence numbers FSC®-C099970 and FSC® -C081854) and PEFC (Programme for the Endorsement of Forest Certification, with licence numbers PEFC/14-22-00010 and PEFC/14-33-00001) in its woodlands and promoting their implementation in third-party woodlands. 21% of the area managed by Ence is devoted to the conservation and diversity of the forest environment.

### 1.2.2 Renewables Business

Ence's Renewables business was created more than 10 years ago as a result of Ence's experience in using biomass to generate renewable energy at its pulp mills and taking advantage of its leading position in the management of agricultural and forest biomass in Spain.

Ence operates in this business through its subsidiary Ence Renovables, which controls 51% of Magnon Green Energy, 75.5% of Magnon Servicios Energéticos (50% directly and 25.5% through Magnon Green Energy) and 100% of Biofertilizantes CH4. The activity of this subsidiary focuses on electricity generation with biomass, the generation of renewable thermal energy for industrial clients, the sale of biomass to third parties and the development of bio-fertiliser and bio-methane plants.

#### 1.2.2.1 ELECTRICITY GENERATION FROM BIOMASS

Since the start-up of its first biomass renewable energy generation plant in Huelva in 2012, Ence has consolidated its leadership in the industry through its subsidiary Magnon Green Energy, which currently has an installed capacity of 266 MW and 2 projects with a combined capacity of 100 MW, positioning itself as the leading company in the industry in Spain.

Biomass plants utilise local agricultural and forestry waste to generate manageable renewable energy, which is why these facilities are concentrated in regions with abundant resources. Magnon has eight independent generation plants: three in Huelva, two in Ciudad Real, one in Córdoba, one in Jaén and one in Mérida. It also has a natural gas cogeneration facility in Lucena (Córdoba). In addition, the Group is completing the administrative processing of two projects, with an aggregate capacity of 100 MW of renewable energy in Castilla la Mancha and Andalusia. Magnon's generation model not only enables for the production of manageable renewable energy without depending on atmospheric conditions such as sun or wind, but also offers a sustainable solution to the problem of agroforestry waste management in the countryside. By putting agricultural pruning residues and biomass from woodland clearing and fire prevention to good use, Magnon provides farmers and forest owners with a sustainable alternative for waste management, reducing the risk of fire from uncontrolled burning and the environmental and public health problems this causes. The biomass used complies with the most demanding sustainability standards, certified under the German SURE scheme.

Energy recovery is carried out using a circular approach, recovering most of the ash generated for use as fertiliser or in other applications such as the manufacture of construction materials. All biomass plants are AENOR Zero Waste certified, which guarantees that at least 90% of the waste generated is recycled or recovered.

As in the pulp business, the biomass energy generation activity generates a positive social impact on the rural environment, generating employment both at the facilities and in the local supply chain (harvesting, suppliers, transporters). This activity contributes to the revitalisation of areas affected by deindustrialisation and depopulation, and is in line with the commitment to just transition. One example is the Puertollano plant, located on the site of a former coal-fired power plant, thus maintaining local employment.

#### 1.2.2.2 GENERATION OF RENEWABLE THERMAL ENERGY

In line with its decarbonisation strategy, Ence has expanded its activity towards the generation of renewable thermal energy using biomass through its company Magnon Servicios Energéticos (MSE). This business line offers integrated solutions for thermal industrial processes that are difficult to electrify, enabling its customers to reduce their dependence on fossil fuels and emission rights, with both environmental and economic benefits.

Ence manages the entire renewable thermal energy value chain, from the supply of certified sustainable biomass, through logistics and processing, and the design and construction of the plant through to its operation and the maintenance of its facilities, including the recovery of ash. Each project is adapted to the specific needs of clients, guaranteeing efficiency and sustainability.

2. Ence does not use genetically modified organisms. Genetic improvement refers to the improvement of plant characteristics through the selection of individual plants and hybridisation techniques.

The company already has one plant in operation and three under construction to be completed by 2026. In addition, in 2025, it was awarded an operation and maintenance contract for a plant that is already built, which is in the commissioning phase and will come on stream in 1T26 The Company is also negotiating 11 other projects, 2 of which are at an advanced stage.

### 1.2.2.3 BIO-FERTILISERS AND BIO-METHANE

Bio-fertilisers CH4 is the Group's subsidiary dedicated to the development and operation of bio-methane and organic fertiliser production plants. Its business model is based on the transformation of agricultural and livestock biomass into biogas which is subsequently purified and injected as bio-methane into the existing gas network. In addition, the digestate generated after the production of biogas production will be used to produce bio-fertilisers by means of composting.

This way, following the same model as in the biomass energy business, Ence's bio-fertiliser and bio-methane model is set as an effective solution for the management of agricultural and livestock waste, mitigating the environmental impacts that its improper handling can generate, such as soil and groundwater pollution. The bio-methane obtained in the process represents a renewable alternative that facilitates the decarbonisation of industries that are difficult to electrify, in line with the European Union's energy transition and decarbonisation objectives. Bio-fertilisers, for their part, make it possible to replace inorganic fertilisers with a high environmental impact, contributing to agricultural sustainability and improving soil quality in the areas where it is applied.

The business incorporates rigorous criteria in the selection of sites and in the design of the plants, prioritising their integration into the social environment and avoiding impacts on population centres through logistics planning that excludes the transit of heavy vehicles through urban areas. The process is another example of circular economy and the plants are designed to be as energy self-sufficient as possible (e.g. through the use of self-consumption photovoltaic plants) and to minimise the use of natural resources, as in the case of water; the process uses the water contained in the input materials (e.g. slurry). In addition, the use of local agricultural and livestock waste as raw material is promoted to avoid generating emissions from transport.

In December 2024, Ence acquired its first bio-methane plant, La Galera, in Tarragona, designed to produce up to 50 GWh per year. In addition to La Galera, at the end of 2025, the company had 25 projects in the environmental pipeline and another 17 initiatives under development. The 2030 target is to have a generation capacity of more than 1 TWh.

### 1.2.2.4 BIOMASS TRADING

Leveraging its leading position in the agricultural and forest biomass value chain in Spain, Magnon also sells biomass from nearby to customers who need this renewable fuel to decarbonise their operations. As in all other biomass-related businesses, the supply of biomass starts with making sure of its sustainability by means of internationally recognised certifications such as that of the SURE System. In addition, PEFC certification (licence number PEFC/14-31-00410) has been achieved in 2025.

The company combines its consolidated experience in the industry with a firm commitment to innovation, aimed at identifying new opportunities for the recovery of biomass resources and expanding its range of products. Ence also works actively with its collaborators to strengthen and professionalise the value chain, facilitating access to specialised machinery and promoting certification among its suppliers as a guarantee of traceability and sustainability.

### 1.2.2.5 BIOGENIC $CO_2$

Finally, the main source of biogenic $CO_2$ comes from agricultural, forestry and livestock biomass, a key raw material in the manufacture of green fuels. The ENCE group generates around 4 million tonnes of biogenic $CO_2$ annually and is making progress both in obtaining permits and in the engineering required for its capture and future use. Environmental management has already begun to install capture systems and authorise the possible production of e-methanol at Ence's industrial complexes, strategically located next to ports or facilities of leading companies in the O&G industry. In addition, agreements have been established with major industry players to develop joint projects.

## 1.3 Strategic framework

In 2025, Ence continued to develop its strategic framework for the 2024-2028 period, which set out the roadmap for the development of its activities in the coming years. This framework is articulated around three fundamental axes: growth, diversification and improved efficiency of its two businesses, all under the vectors of the circular bio-economy and decarbonisation.

For its definition and deployment, Ence incorporates both market and technological trends and the expectations of its stakeholders, integrated in the annual strategic reflection process and in the updating of the SWOT matrices that guide the guidelines and objectives of each financial year. The groups considered include financial institutions (financiers, analysts, etc.), public institutions at all levels (European, national, regional, local, etc.), local communities in the company's areas of operation, customers, suppliers, shareholders and investors, and employees. It also analyses changes and trends related to natural capital, with a particular focus on the effects of climate change on the forestry and agricultural sectors, and the availability of critical resources such as water.

### 1.3.1 Strategic Framework - Pulp business

Ence's strategy in the pulp business involves increasing its cost **competitiveness**, with local wood supply as a key pillar, and diversifying its production towards speciality pulps that replace long fibre, with higher margins, taking advantage of its competitive advantages in the European market.

In 2025, sales of speciality pulp from the ***Ence Advanced*** product range accounted for 30% of sales (+7 percentage points higher than in 2024). This consists of types of pulp with better technical properties and a smaller environmental footprint, capable of replacing long-fibre cellulose, which has a higher price, resulting in a higher margin for these products compared with standard cellulose.

In addition, in the fourth quarter of the year Ence started production of its first fluff line with a capacity of 125,000 tonnes. This makes it the only producer of fluff pulp with eucalyptus fibre in Europe, competing in the local market with long-fibre producers. The company is currently working on eight approval processes. In addition to being more cost competitive, this pulp offers customers a European-made alternative with a lower carbon footprint.

Specialty pulps (Ence Advanced and fluff) are set to account for more than 62% of the group's sales by 2028 with an incremental margin compared to standard BHKP pulp of €36/tn.

On the other hand, Ence has developed a range of **renewable** moulded pulp-based packaging capable of replacing plastic packaging in the food sector, such as trays for fresh and prepared products. The company plans to start production in the second half of 2027, with an expected investment in thermoforming machines of €12 million. This project has an expected return on capital (ROCE) of over 15%.

In terms of **efficiency**, the company is finalising the engineering and processing of the Pontevedra Avanza project, with the aim of reducing the production cost of this bio-factory by €50 per metric ton (€20/t for the Group as a whole), improving its flexibility to use different types of eucalyptus and continuing to shift production towards the *Ence Advanced* cellulose range. The budgeted investment for this project amounts to €120 million, with an expected return (ROCE) of over 12%. The project would be implemented progressively, during the annual maintenance shutdowns.

In addition, the company is finalising the engineering for the project to **decarbonise** its Navia bio-factory by refurbishing the wood yard and replacing natural gas with biomass in the lime kilns. This project will reduce the bio-factory's scope 1 emissions by 60% and improve its production cost by €13 per metric ton (€8/t Group-wide).

Finally, the company continues to make progress in the engineering and processing of an innovative project, located in the A Coruña town of As Pontes, for the production of 100,000 metric tons a year of **recycled and bleached cellulose** from recovered fibres, without increasing the consumption of wood. In August 2025, the project obtained Integrated Environmental Authorisation ("IEA"). Obtaining the IEA not only validates the environmental commitment of the project, but also allows to move firmly towards the implementation of a strategic initiative for the sustainable reindustrialisation of the region. This project is not only an example of circular economy, but also a paradigm of fair transition, as it will be implemented on industrial land used until now as a coal storage park for a thermal power plant which is in the process of being decommissioned. The project thus offers quality employment opportunities in a renewable industry in a traditionally industrial environment, hitherto linked to the use of fossil fuels.

In the area of forest management, Ence continues to make progress in enhancing the value of its **Natural Capital** through the identification, management and promotion of the ecosystem services offered by the company's forest assets. In 2022, Ence launched a project to establish a network of forest carbon sinks that contribute to climate change mitigation and offer other organisations the possibility of offsetting emissions by acquiring carbon credits generated in Ence's woodlands. This new line of value generation for Ence has exceeded 50,000 $tCO_2$ registered with the Spanish Office for Climate Change for commercialisation.

## 1.3.2 Strategic Framework - Renewables Business

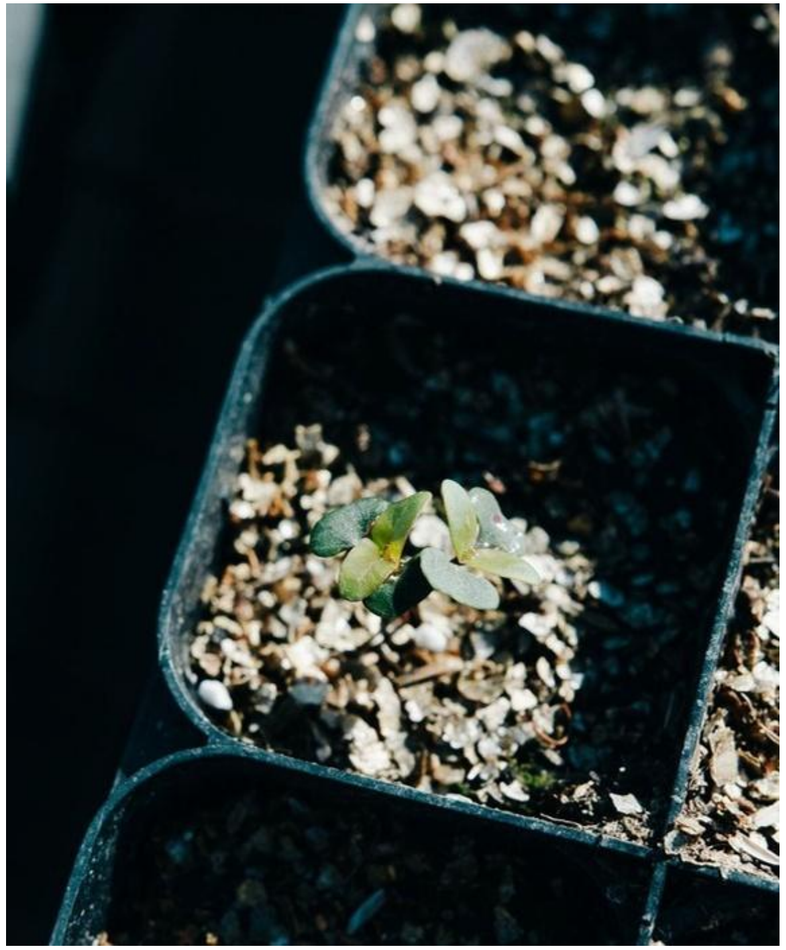
Ence's strategy in the Renewables business involves the growth and **diversification** of its activities towards new renewable energies, taking advantage of its leading position in the biomass value chain in Spain.

Firstly, through its subsidiary **Magnon Servicios Energéticos**, the Group offers comprehensive solutions for the generation of renewable thermal energy from biomass for industrial customers in Spain. The company aims to achieve a production of 2,000 GWh of renewable thermal energy by 2030, with an estimated investment of between €0.1 and €0.2 million per GWh and a return on capital employed (ROCE) of over 11%. At the end of 2024 Magnon signed a contract with Mahou, Spain's leading brewer, for the installation of two biomass boilers of 10 MWt each at its factory in Alovera (Guadalajara) and for the supply of 85 GWht per year of renewable thermal energy for 15 years to decarbonise its operations. The plant is under construction and is expected to be commissioned by mid-2026.

Additionally, during 2025, the construction of another two boilers of 8MWt each was started for an international dairy company with a presence in Spain and an O&M contract was signed with a company in the food sector, currently in the commissioning phase. In addition, the company already has one project in operation with a major food company in Spain and eleven more projects in the negotiation phase.

Secondly, through its subsidiary Ence Biogás, the Group is developing bio-methane and bio-fertiliser production plants using a model based on the sustainable and circular management of agricultural and livestock biomass. The company aims to create a large bio-methane platform in Spain and reach a production of 1,000 GWh in 2030, with an estimated investment of €0.4 million per GWh and an expected return on capital employed (ROCE) of more than 12%. In December 2024, Ence Biogas acquired its first bio-methane plant in Tarragona, designed to produce up to 50 GWh per year, and signed a 15-year agreement with a major gas trader to sell the bio-methane produced at the plant. At year-end, the company had a portfolio of 25 projects in environmental processing, mainly in Castilla y León, Aragón, Catalonia, Castilla-La Mancha, Extremadura and Andalusia, with a further 17 initiatives under development.

Lastly, it is also important to point out that agricultural, forest and livestock biomass is the main source of biogenic $CO_2$, which is a necessary raw material for the **production of green fuels**. The Ence group produces around 4 million metric tons a year of biogenic $CO_2$ and is advancing in the engineering and permits necessary for its potential capture and use in the future.



## 1.3.3 Main financial results

The Group sold 966,558 tonnes in 2025. Ence Advanced special products, substitutes for long fibre products accounted for 30% of total pulp sales in 2025, with a margin per metric ton €37 higher than that of standard pulp.

As mentioned above, in the fourth quarter of the year Ence started production of its first fluff line with a capacity of 125,000 tonnes.

Ence's average selling price in 2025 was €503/tn, 22% lower than the previous financial year, marked by an average gross price in Europe of $1,086/tn (-12% compared to the previous year) and a weak US dollar. However, the average cost per tonne (cash cost) fell by €10/tonne to €483/tonne, the lowest since 2022. Local wood supply and the optimisation of wood processing, together with continuous improvement processes, have been key elements in the savings generated.

The operating margin per metric ton reached €20 in 2025 and EBITDA in the pulp business was €56 million.

Biomass electricity generation activity produced 1,241 GWh, 6% more than in 2024. La Galera, the bio-methane plant acquired in 2027, increased its annual production by 27% in the first year of Ence's management, thanks to operational measures without associated investments. As a result, EBITDA in the renewables business was €27 million, up 4% year-on-year.

Attributable profit for the financial year was a loss of €56 million in 2025, compared to a profit of €32 million in the previous financial year, in a year of high macro uncertainty with a weak US dollar and low pulp prices.

Normalised free cash flow generated before growth investments and sustainability enhancement investments reached €9 million in 2025, compared with €35 million in 2024.

Payments for expansion and sustainability enhancement investments amounted to €59 million in 2025.

- Investments in the pulp business amounted to €41 million. Noteworthy are those related to the first fluff pulp production line, which began operations in the fourth quarter, approving products for customers; the Navia cost reduction and decarbonisation project; and the sustainable packaging project, together with the engineering of the Pontevedra Avanza project and the As Pontes project, which together have involved a cash outflow of €28 million. Investments related to several initiatives to strengthen safety and reduce water consumption, emissions, odours and noise in our bio-factories, which will improve Ence's competitiveness in the long term, resulted in a cash outflow of €13 million.

- In the renewables business, investments in growth, efficiency improvement and sustainability amounted to €18 million and are mainly linked to the development of renewable thermal energy and bio-methane projects.

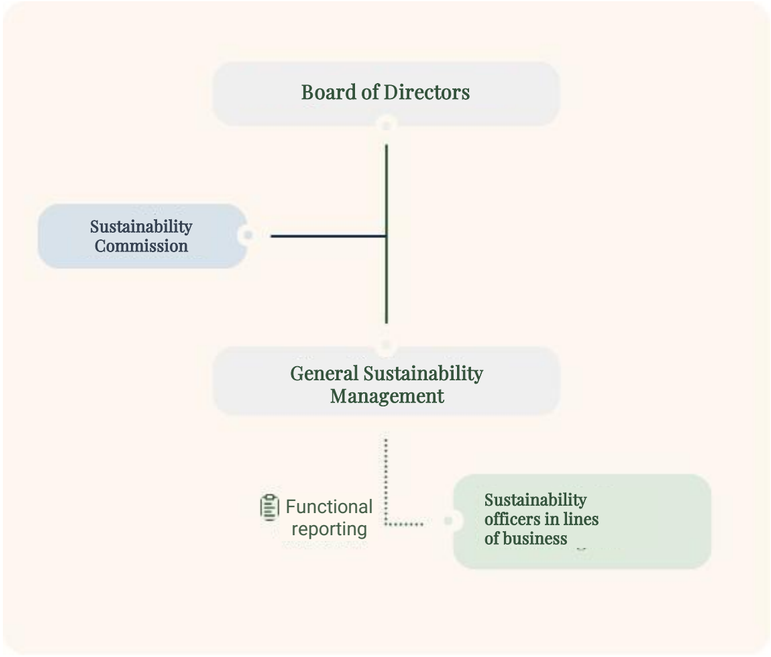
The Group's net financial debt at year-end, including lease liabilities, amounted to €378 million, of which €266 million corresponded to the Pulp business and €112 million to the Renewables business. Cash and cash equivalents amounted to €241 million. The strength of the Group's balance sheet and the expected cash generation provide a solid basis for achieving the planned growth and diversification targets in both businesses.

Ence continues to be the leading company in sustainability. Ence's outstanding environmental, social and corporate governance (ESG) performance has been recognised by prestigious agencies and ESG indices. Thus, in 2025, the rating agency specialising in ESG criteria EthiFinance awarded Ence an "Excellent" rating in its Solicited Sustainability Rating. This ESG rating assesses the company's performance in four pillars: governance, environment, social — in-house staff, and social —, external stakeholders. Ence also belongs to the prestigious *FTSE4Good Index Series*, designed to measure the performance of companies that demonstrate sound practices in ESG criteria, in which the company has participated since 2021. In addition, during 2025, Ence remained an active member of the Global Compact.

## 1.4 Sustainability management

### 1.4.1 Governance bodies as regards sustainability

Ence's Board of Directors has a specific Sustainability Commission. This **Sustainability Commission** is chaired by an independent director with extensive experience in the management of environmental, social and governance (ESG) issues in international industrial companies. The main duty of this Commission is to set and monitor the sustainability strategy, supervise relations with the company's stakeholders and supervise the information that Ence provides to the market in relation to ESG aspects. The commission meets at least once every quarter and in 2025 it has held a total of 5 meetings. This approach demonstrates Ence's active commitment to the effective and transparent management of sustainability-related aspects of its corporate governance model.




The main issues addressed in 2025 were:

- Approval of the 2026 sustainability objectives.
- Update on new regulatory developments in the field of sustainability: European Union Regulation against Deforestation (EUDR), European Renewable Energy Directive (RED III) and CSRD transposition.
- Review of the update of the double materiality analysis.
- Monitoring the implementation of the Biodiversity Plan.
- Quarterly monitoring of sustainability objectives with a main focus on the areas of health and safety.
- Follow-up of the company's social actions and sponsorships.
- Identification and review of climate change and ESG risks.
- Review of the results of sustainable forest management audits (FSC® and PEFC).
- Update of the analysis of climate and ESG risks.

Sustainability forms part of Ence's strategic core and is integrated into the company's main governing bodies. Both the Management Committee and the Board of Directors, especially through the Sustainability Commission, continuously monitor the **indicators** defined in Ence's Sustainability Master Plan, as well as the key projects promoted in this area. On the other hand, the ESG risks included in the corporate risk map are reviewed by the Audit Committee. In addition, the Audit Committee of the Board is responsible for monitoring and assessing the preparation process and the integrity of non-financial information, as well as the effectiveness of the system of internal control and non-financial risk management and the relationship with the auditors.

The full scope of the Sustainability Commission's and the Audit Committee's functions is detailed in the **Ence Board of Directors' Operating Regulations**.

**DOWNLOAD THE REGULATIONS**

OPERATING REGULATIONS OF ENCE'S BOARD OF DIRECTORS.

In addition, the strategic guidelines and objectives for the financial year are established as part of the Strategic Reflection Process carried out annually by the **Management Committee**. This process involves reviewing stakeholder expectations, analysing the ESG aspects included in the SWOT matrices and assessing their integration into Ence's Purpose, Vision, Mission and Values.

At the executive level, the **General Sustainability Management** leads the corporate sustainability team in charge of coordinating cross-cutting projects and sustainability reporting. This management is supported by **sustainability officers** in the business areas, who report functionally to General Management. The Managing Director of Sustainability reports directly to the Chairperson, which reinforces the strategic relevance of this position.

### 1.4.1.1 SUSTAINABILITY OBJECTIVES LINKED TO VARIABLE REMUNERATION

Ence's strategic priorities translate into specific objectives linked to variable remuneration schemes, both short-term and long-term, for management teams. The Long-Term Incentive (ILP) 2023-2027, reported favourably by the Appointments and Remuneration Committee and approved by the General Shareholders' Meeting in 2023, has a duration of five years and is structured in three overlapping annual cycles, each with a duration of three years and independent of each other. Specific objectives are defined at the beginning of each cycle, including economic and financial variables, value creation and ESG. The ESG objectives set for each cycle are detailed below:

**2023-2027 Long-Term Incentive - ESG objectives**

| Cycle | Years | Weight of ESG as % of total ILP | ESG objective (weight as % of total ESG) |
|---|---|---|---|
| I | 2023-2025 | 25% | Reduction of water consumption in bio-factories (8.33%)<br>Reduction of minutes of odour in bio-factories (8.33%)<br>Improvement of the organisational climate (8.33%) |
| II | 2024-2026 | 30% | Water resilience Pontevedra (5%)<br>Water resilience Navia (5%)<br>Decarbonisation Pontevedra (5%) (1)<br>Decarbonisation Navia (5%) (1)<br>Organizational Climate (5%)<br>Security (5%) |
| III | 2025-2027 | 15% | 5% Decarbonisation of lime kiln in Navia (1):<br>Organizational Climate (5%)<br>Security (5%) |

*(1) Targets directly related to achieving the emission reduction targets included in the Decarbonisation Plan*

## 1.4.2 Sustainability policies

In 2018 the Board of Directors approved the Sustainability Policy the purpose of which is to set out Ence's action guidelines to help improve people's well-being, ensure the environmental sustainability of its operations, promote the economic and social development of the communities in which it operates and create value that is sustainable over time for its stakeholders. This Policy, applicable to the entire Ence Group, includes the following **principles of action**:

- Commitment and respect for legality and Ence's ethical principles
- Commitment to Human Rights
- Commitment to people
- Commitment to external and internal clients
- Commitment to institutions
- Commitment to the environment
- Commitment to continuous improvement
- Commitment to results
- Commitment to Ence

The Sustainability Policy also describes the **commitments and** communication channels with stakeholders. Apart from this, in order to guarantee a performance monitoring system, it also establishes the Board of Directors as the highest body responsible for supervising compliance with the policy, through its Sustainability Commission, which monitors its principles and commitments.

In addition to this framework policy, Ence has **Specific policies** in different areas of sustainability, all of which are available on the website. The details of each policy are included in the specific chapters for each material issue it addresses:

**Specific sustainability policies**

- Health and Safety Policy (website)
- Purchasing policy (website)
- Diversity and equality of opportunities policy (website)
- Sustainability Due Diligence Policy (website)
- Environmental Policy (website)
- Biodiversity Policy (website)
- Climate Change Policy (website)
- Stakeholder Relations and Positive Social Impact Policy (website)

These Policies include the guidelines and principles of action for each specific matter, covering the various related impacts, risks and opportunities. They also establish roles and responsibilities to ensure proper implementation and monitoring. During the Policy definition phase, Ence takes into account the current context as well as the interests and opinions of the stakeholders identified at that time.

ACCESS MORE INFORMATION
ENCE'S WEBSITE

## 1.4.3 Stakeholder relations

Ence promotes sustainability through relationships of trust and shared value with its stakeholders. To this end, it maintains an open and structured dialogue that enables it to learn about their most relevant expectations and needs.

The **Stakeholder Relations and Positive Social Impact Policy** establishes a framework for action based on integrity, active listening and transparency, with the objective of fostering relationships of trust and shared value. The company identifies and prioritises stakeholders, encourages their participation, ensures accessible communication channels and implements plans to reduce negative impacts and enhance positive impacts in its areas of influence.

The definition of objectives and plans for stakeholder relations and positive impact is the responsibility of the Management Committee, while the Sustainability Commission monitors these plans, reviews compliance with the established objectives and reports periodically to the Board of Directors on the progress.

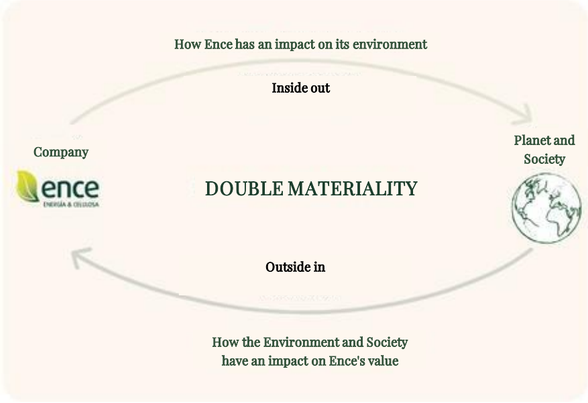
| Stakeholders | Communication channels |
|---|---|
| Shareholders, investors and the financial community | Specific meetings, roadshows, presentations of results, dedicated space on the website. |
| Employees | Intranet, AUNA platform, internal channels and applications, monthly surveys, annual climate survey, breakfasts with the Chairperson, internal presentations of results. |
| Customers | Customer portal, targeted meetings, regular visits, satisfaction surveys, participation in industry events. |
| Suppliers and contractors | ARIBA platform, supplier portal, meetings, training sessions, interviews, focus groups, etc. |
| Local communities | Site visits, meetings with local associations, opinion surveys. |
| Administrations and institutions | Participation in sectoral associations, meetings, participation in industry events, visits. |
| Other influential groups (analysts, civil society organisations, media, etc.) | Meetings, interviews, focus groups. |

Ence complements its ongoing communication channels with public meetings and presentations to engage in dialogue with stakeholders on new projects. This way, it gathers their opinions, which are taken into account by the company when defining its implementation strategy.

Furthermore, Ence provides relevant information through general channels such as its website, annual reports and environmental statements from its facilities. It also makes available to all stakeholders the **Integrity Line**, through which they can report possible breaches of the Code of Conduct and other corporate policies (see the ***Integrity Line*** section).

## 1.4.4 Double materiality analysis

Ence carries out a double materiality analysis to define its material issues. This approach incorporates a dual perspective: on the one hand, **impact materiality**, which analyses how Ence's activities affect the environment, society and human rights; and on the other, **financial materiality**, which assesses how these aspects can influence the company's business model and the generation of value.




Both dimensions make it possible to identify the issues that are truly relevant for Ence, either from the point of view of impact materiality, due to the impact it generates, which may be real or potential, positive or negative, caused directly or linked to its value chain[3] on people, society or the environment or from the point of view of financial materiality, due to the risk or opportunity it represents for the organisation that influence or may influence Ence's value generation model (in the short, medium and long term)[4].

### 1.4.4.1 METHODOLOGY

The methodology followed has been developed in three main phases:

- **Business model and value chain analysis:** A detailed mapping of Ence's operations and its value chain has been carried out, identifying the relevant issues to be assessed, structured in different levels of detail (topics, sub-topics and sub-sub-topics), in accordance with Appendix A of the ESRS 1 standard.

- **Identification of impacts, risks and opportunities (IROs):** Relevant IROs have been identified by reviewing previous studies, sector benchmarks and international standards, considering both internal (sessions with key personnel) and external (consultations with investors, customers and suppliers) perspectives. The current and potential impacts of Ence's activities have been analysed, along with the associated risks and opportunities, in order to understand their possible financial and strategic effects. The result is a detailed list of IROs that serves as the basis for the double materiality matrix.

- **IROs evaluation:** The degree of impact of each issue on the environment and its financial relevance has been assessed and a specific assessment mechanism has been defined (for more information on this assessment, see ***Appendix II***). This assessment has been key in determining the material issues that make up double materiality.

**Main changes in Double Materiality in 2025 vs. 2024:**

In 2025, an update of the double materiality analysis has been carried out, with the objective of strengthening its alignment with the regulatory, strategic and operational context of the company. The main improvements introduced have been:

- Review and justification of non-material sub-topics, in order to focus the analysis on the issues that are really relevant for the company.

- Restructuring of IROs, in a structural reorganisation exercise, grouping impacts, risks and opportunities to facilitate their assessment and understanding.

- Revision of IRO valuations, incorporating the results of the updated climate risk analysis and ESG analysis, ensuring a more accurate and up-to-date view.

3. Ence has taken into account in its double materiality analysis all phases of the value chain of its businesses: pulp, energy, forestry, bio-fertilisers and bio-methane and corporate. These phases correspond to the extraction/manufacturing of raw materials, management of own forests, upstream transport, production, downstream transport and distribution, utilisation and corporate activities.
4. The time intervals defined are short term (one year), medium term (up to five years) and long term (more than five years).

### 1.4.4.2 RESULTS

10 key material issues have been identified for Ence (for definition, see Appendix II).

The following table shows the relationship between the material issues and the topics set out in EFRAG's ESRS.

| Material issue - Ence Group | ESRS |
|---|---|
| Climate change mitigation and adaptation | ESRS E1 - Climate Change |
| Pollution prevention | ESRS E2 - Pollution |
| Water management | ESRS E3 - Water and marine resources |
| Biodiversity | ESRS E4 - Biodiversity and ecosystems |
| Circular economy | ESRS E5 - Resource use & circular economy |
| Human capital management | ESRS S1 - Own workforce |
| Human rights in the value chain | ESRS S2 - Workers in the value chain |
| Relationship with local communities | ESRS S3 - Affected communities |
| Added value for the customer | Entity-specific - Given that the information required for ESRS S4 "consumers and end users" can to some extent be extrapolated to the stakeholder group "customers", Ence has used the ESRS S4 reporting framework to provide the information related to this material issue. |
| Responsible Governance | ESRS G1 - Business conduct |

For the assessment of materiality, and in order to avoid offsetting positive impacts with negative impacts, a consolidation approach has been adopted based on the **highest absolute value** of positive or negative impacts for impact materiality, and the **highest absolute value** of risks or opportunities for financial materiality. The results for financial materiality and impact materiality are presented below:

| Material issue - Ence Group | Financial materiality | Impact materiality |
|---|---|---|
| Climate change mitigation and adaptation | | |
| Added value for the customer | | |
| Water management | | |
| Human capital management | | |
| Biodiversity | | |
| Relationship with local communities | | |
| Pollution prevention | | |
| Responsible Governance | | |
| Circular economy | | |
| Human rights in the value chain | | |


**Main changes in Double Materiality results in 2025 vs. 2024:** The review of double materiality has not resulted in new material issues or the elimination of material issues, but in a simplification of the IROs and adjustment of valuations of material issues:

- Increase in the financial materiality of the material issue Relations with local communities, due to the increase in the criticality of the risk associated with the possible cancellation of bio-fertiliser and bio-methane projects due to social opposition in Ence's business growth model.
- Reduction of the financial materiality of the material issue Water Management, as a result of the implementation of actions to reduce consumption and increase water recovery and recirculation that increase autonomy and reduce the operation's dependence on water resources, thus reducing the potential financial impact.
- Minor adjustments to the rest of the material issues, arising from the update of the ESG risk analysis (see section *1.4.6.6 Process of identification, assessment and management of ESG risks* and *Climate Risks*) and from the technical review of the IRO valuations.

## 1.4.5 2024-2028 Sustainability Master Plan and annual targets

The 2024-2028 Sustainability Master Plan (SMP) consists of **four strategic pillars and one cross-cutting core concept**:

| Safe and eco-efficient operation | Bio-products and ecosystem services | Responsible supply chain | Positive social impact |
|---|---|---|---|
| This strategic pillar includes lines that **pursue operational excellence of industrial and forestry activities** in environmental and safety terms. | This strategic pillar includes lines aimed at **diversifying and boosting Ence's portfolio of value-added products and services**. | This strategic pillar includes lines that seek to **improve the management** of the main ESG issues **throughout the supply chain**. | This strategic pillar groups together those lines aimed at **creating a positive social footprint both internally** (Ence personnel) **and in the local communities** where we operate. |

**Cross-cutting core concept** that includes the **system governance** and the strengthening of the **ethics and compliance** function.

In order to achieve the long-term objectives included in the 2024-2028 Sustainability Master Plan, annual targets are set for each line of action. These objectives are revised on a monthly basis by the Management Committee and reported to the Board of Directors. The Board's Sustainability Commission reviews the progress of the objectives on a quarterly basis. Details of objectives of the 2024-2028 Sustainability Master Plan are set out below, together with the annual objectives and the degree of attainment for 2025:

| | Lines of action | Main measures | 24-28 Objectives | 2025 Objective | 2025 Performance |
|---|---|---|---|---|---|
| **1 - SAFE AND ECO-EFFICIENT OPERATION** | | | | | |
| | Strengthen **health and safety** programmes to reduce impacts on people. | ▪ Frequency Index<br>▪ Severity Index | ▪ Values according to each business line | ▪ Values according to each business line | 🟡 |
| | Maintain the **social licence to operate** (odour, noise and dust) | ▪ Noise reduction | ▪ Values depending on the facility | ▪ Values depending on the facility | 🟢 |
| | | ▪ Reduce minutes of odour | ▪ Pulp: <60 min/year (2028) | ▪ Pontevedra: 60 min<br>▪ Navia: 40 min | 🔴<br>🟢 |
| | | ▪ Reduction of dust and air emissions | ▪ Values depending on the facility | ▪ Preventive plan at all independent power plants<br>▪ Pontevedra: 42 mg/Nm3 Biomass boiler particulate matter<br>▪ Navia: 17 mg/Nm3 particulate matter biomass boiler | 🟢<br>🟢<br>🟢 |
| | | ▪ Number of complaints | ▪ Pulp: 6/year (2028)<br>▪ Energy: 2/year (2028) | ▪ Total group: 7 | 🟢 |
| | Securing water **supply and reducing consumption** | ▪ Monitoring of access to water availability measures | ▪ Navia: Improved capacity for capture and storage, treatment and recirculation of effluent<br>▪ Pontevedra: treatment and recirculation of effluent and recirculation of municipal wastewater treatment plant water | ▪ Monitoring of measures | 🟢 |
| | | ▪ Specific water consumption reduction targets | ▪ Pulp: 24 m3/tAD (2028) | ▪ Pontevedra: 24.5 m3/taD<br>▪ Navia: 26.5 m3/tAD | 🟡<br>🟢 |
| | | | ▪ Energy: Values depending on the facility | ▪ Energy: Compliance with the action plans of each facility | 🟢 |
| | Reducing CO2 emissions | ▪ Development of a Decarbonisation Plan including specific emission reduction measures and reduction targets. | ▪ Decarbonisation Plan and setting reduction targets for the Ence Group (fulfilled in 2024)<br>▪ Reduce the Group's scope 1+2 emissions by 55% in 2030 and 75% in 2035 relative to base year 2018<br>▪ Reduce the Group's Scope 3 emissions by 10% by 2030 and 15% by 2035 relative to 2023 | ▪ Compliance with the execution deadlines foreseen in the Plan (Navia)<br>▪ Analysis of SBTi requirements with regard to the Decarbonisation Plan<br>▪ Carbon footprint segregated for BEKP and UKP pulp (Naturcell) | 🟢<br>🟢<br>🟢 |

🟢 Met 🟡 Partially met: When the target has several milestones and some of them have been met but not all / When the target has not been met but exceeds 95% of the target. 🔴 Unmet

| | Lines of action | Main measures | 24-28 Objectives | 2025 Objective | 2025 Performance |
|---|---|---|---|---|---|
| **1 - SAFE AND ECO-EFFICIENT OPERATION** | | | | | |
| | Managing **climate risks and opportunities** | ▪ Analysis of Climate Risks and Opportunities Analysis are the new IPCC scenarios and CSRD requirements. | ▪ Annual update of the analysis Climate Risks and Opportunities | ▪ Updated Analysis of Climate Risks and Opportunities | 🟢 |
| | Developing a **Biodiversity Strategy** for own forests | ▪ Elaboration of a Strategic Biodiversity Plan | ▪ Plan developed and KPIs established (met objective in 2024) | ▪ Monitoring of the developed Plan and defined KPIs | 🟢 |
| | | | | ▪ 0 ha of actions with negative impacts on biodiversity | 🔴 |
| | | | | ▪ 254 ha of restored area | 🟢 |
| | | | | ▪ 0.3 promotion of connectivity between protection areas | 🟢 |
| | | | | ▪ 9.24 ha transition area between plantations and protected areas (ecotones) | 🔴 |
| | | | | ▪ 11.5 % maintenance Conservation Area Network (CAN) North and 24.4% maintenance CAN South | 🟢 |
| | | ▪ Analysis and potential adoption of the TFND recommendations (*Taskforce on Nature-related Financial Disclosures*). | ▪ TNFD Analysis | ▪ Performed TNFD Analysis | Postponed |
| **2 - BIO-PRODUCTS AND ECOSYSTEM SERVICES** | | | | | |
| | Increase market penetration of the **Ence Advanced** product portfolio. | ▪ Increase market penetration of special products | ▪ 160 product approvals in 2028 | ▪ 135 special product approvals | 🟢 |
| | | ▪ Increased sales of special and *Fluff* products | ▪ >50% on 2028 | ▪ Increase EBITDA of speciality products to a target level by 2025 | 🟢 |
| | | | | ▪ 7 Fluff sustainability certifications | 🟡 |
| | Start production of **moulded cellulose** | ▪ Implement actions for moulded cellulose production | ▪ Degree of progress depending on actions | ▪ N/A | N/A |
| | Launch production of **recovered wood pulp** | ▪ Implement actions for recovered wood pulp production | ▪ Degree of progress depending on actions | ▪ N/A | N/A |

🟢 Met 🟡 Partially met: When the target has several milestones and some of them have been met but not all / When the target has not been met but exceeds 95% of the target. 🔴 Unmet

| | Lines of action | Main measures | 24-28 Objectives | 2025 Objective | 2025 Performance |
|---|---|---|---|---|---|
| **2 - BIO-PRODUCTS AND ECOSYSTEM SERVICES** | | | | | |
| | Boost the **circular economy** by developing **secondary raw materials** | ▪ Circular economy certification | ▪ Obtain circular economy certification for Magnon (obtained in 2024 and 2025) | ▪ Achieving by-product status for HU46 ashes | 🟢 |
| | | ▪ Number of R&D projects on new secondary raw materials | ▪ Pulp: 3 projects (2028)<br>▪ Energy: 2 projects (2028) | ▪ N/A | N/A |
| | | ▪ Increased sales of new secondary raw materials | ▪ Pulp: 4,000 metric tons (industrial waste and lignin) | ▪ N/A | N/A |
| | | ▪ % of waste recovered + by-products for which we receive financial remuneration / total waste produced | ▪ Energy: increase by 2% from 2022, to reach 8%. | ▪ Energy: increase by 2% to reach 8%. | 🟢 |
| | Develop **ecosystem services and CO2** sequestration in own and third-party woodlands | ▪ Promoting the creation of forest sinks | ▪ 6,000 hectares registered as forest sinks (2028) | ▪ 1,000 hectares recorded as forest sinks | 🔴 |
| | | ▪ Promote and increase sales of voluntary carbon credits. | ▪ 150k t CO2eq (2028) | ▪ 37,500 tCO2 sold | 🔴 |
| | | ▪ Develop other ecosystem services beyond carbon credits | ▪ Business plan for new ecosystem services (completed in 2024-2025) | ▪ Developing the Ecosystem Services Plan | 🟢 |
| | Develop **improved plant material** | ▪ Develop and promote new plant material adapted to climate change | ▪ 6 new clones in commercial production (2028) | ▪ 1 new clone in commercial phase | 🟢 |
| | Implement pipeline for **bio-methane plants** | ▪ Implement pipeline for bio-methane plants | ▪ Biogas 1 TWh (2028) | ▪ N/A | N/A |
| | Develop pipeline for renewable thermal energy | ▪ Implement pipeline for renewable thermal energy | ▪ Installed generation of 600GWh (2028) | ▪ N/A | N/A |
| | Define and process permits for **biogenic CO2** capture | ▪ Define and process permits for biogenic CO2 capture | ▪ Start project in 2028 to attain capture of 1,467 kt by 2030 | ▪ N/A | N/A |
| **3 – RESPONSIBLE SUPPLY CHAIN** | | | | | |
| | Ensure the **sustainability of wood through** FSC® and/or PEFC certification | ▪ Pulp: Increase the % of FSC® and/or PEFC certified wood. | ▪ ≥75% of wood certified (2024-2028) | ▪ ≥75% of wood certified | 🟢 |
| | | ▪ Forestry: Increase the area of own forest certified FSC® and/or PEFC® | ▪ 100% of certifiable area (2028) | ▪ 90.76% (2025) | 🟡 |
| | | ▪ Compliance with the % of certified biomass consumption per plant | ▪ 90% certified biomass per plant (100% in Lucena) | ▪ 90% certified biomass per plant (100% in Lucena) | 🟢 |
| | | | | ▪ Achieving PEFC certification to facilitate sales for biomass trading | 🟢 |

🟢 Met 🟡 Partially met: When the target has several milestones and some of them have been met but not all / When the target has not been met but exceeds 95% of the target. 🔴 Unmet

| | Lines of action | Main measures | 24-28 Objectives | 2025 Objective | 2025 Performance |
|---|---|---|---|---|---|
| **3 – RESPONSIBLE SUPPLY CHAIN** | | | | | |
| | Establish a **Due Diligence** process in the value chain | ▪ Implement the Due Diligence Procedure in line with the Sustainability Due Diligence Policy in all supplier groups. | ▪ >90% of purchase volume analysed (2028) | ▪ Implemented tool and >1000 suppliers assessed | 🟢 |
| | | | | ▪ Code of Conduct for third parties drawn up and approved by the Board | 🟢 |
| | | ▪ Implement the customer environmental and human rights assessment system. | ▪ Pulp and forestry: > 90% of customers (2028) | ▪ N/A | N/A |
| | | ▪ % volume of purchases from audited risk suppliers | ▪ > 90% (2028) | ▪ N/A | N/A |
| **4 - POSITIVE SOCIAL IMPACT** | | | | | |
| | Promote **equality, development and retention of talent** | ▪ Increase the % of women in the workforce | ▪ 32% (2028) | ▪ 29% (2025) | 🔴 |
| | | ▪ Increase the % of female executives (directors and managers) | ▪ 32% (2028) | ▪ 30% (2025) | 🟢 |
| | | ▪ Boost internal promotion (no. of vacancies filled by internal promotions / no. of new recruits) | ▪ 30% p.a. (2024-2028) | ▪ 30% (2025) | 🟢 |
| | | ▪ Turnover rate in key positions (no. of voluntary departures of Key Persons / total no. of Key Persons) | ▪ <2% | ▪ <2% | 🟢 |
| | | ▪ Top Employer Certification. | ▪ N/A | ▪ Maintaining certification in 2025 | 🟢 |
| | Foster **professional development** in local communities | Continue the training of logging machine operators | >30 beneficiaries/year (2024-2028) | Forestry: >30 beneficiaries/year | 🟡 |
| | | Advice to owners through the Management Improvement Team | >350 owners/year (2024-2028) | Forestry: >350 owners/year | 🟢 |
| | | | | >60% of improvements introduced | 🔴 |
| | | % of people from local communities hired/total hires | 35% | ▪ N/A | N/A |
| | | Talent Programme | Incorporation of >4 scholarship holders per year (2024-2028) | Launch 4 Talent programmes (bio-factories, Magnon and corporate) | 🟢 |
| | | | | 4 new trainees | 🟢 |
| | Develop a **Social Investment Plan** for Ence to have an impact | Update Socio-Economic Impact Reports | Reports updated (completed in 2024) | ▪ N/A | N/A |

🟢 Met 🟡 Partially met: When the target has several milestones and some of them have been met but not all / When the target has not been met but exceeds 95% of the target. 🔴 Unmet

| | Lines of action | Main measures | 24-28 Objectives | 2025 Objective | 2025 Performance |
|---|---|---|---|---|---|
| **4 - POSITIVE SOCIAL IMPACT** | | | | | |
| | Develop and implement a **Stakeholder Relations Model**. | ▪ Stakeholder relations plan | ▪ Stakeholder relations plan, visits<br>▪ Stakeholder relations plan, meetings with stakeholders | ▪ Stakeholder relations plan, visits: 750 visits | 🟢 |
| | | | | ▪ Stakeholder relations plan, meetings with stakeholders: 50 meetings | 🟢 |
| | | | | ▪ Update Magnon's stakeholder matrix | 🟢 |
| | | | | ▪ Stakeholder engagement plan and at least 1 submitted perception report | Postponed |
| | | ▪ Review the collaboration agreements with local councils and the Pontevedra Social Plan to align them with the stakeholder relations policy. | ▪ Agreements and Pontevedra Social Plan reviewed (2024-2028) | ▪ N/A | N/A |
| | | ▪ Develop social impact KPIs (SROI, etc.) | ▪ KPIs developed (2024-2028) | ▪ N/A | N/A |
| | ⟵ CROSS-CUTTING CORE CONCEPT - SYSTEM GOVERNANCE ⟶ | | | | |
| | Strengthen the ethics and compliance function | ▪ All Ence employees to accept the Code of Conduct | ▪ Code of conduct accepted by 100% of employees (2024-2028) | ▪ Updated Code of Conduct approved by the Board | 🟢 |
| | | ▪ Ethics and compliance training | ▪ >350 owners/year (2024-2028) | ▪ Antitrust policy developed and approved by the Board | 🟢 |
| | | | ▪ ≥90% of employees trained on ethics and compliance issues (2024-2028) | ▪ ≥90% of employees trained on ethics and compliance issues | 🟢 |
| | | ▪ Institute ISO 37001 Anti-Bribery Management System certification | ▪ ISO 37001 certified (2025) | ▪ ISO 37001 Certification | 🟢 |

In defining these objectives the various responsible areas were involved and account was taken, among other things, of the company's strategic priorities, the comparative analysis with companies in the sector, the historical values recorded, and applicable regulations.

🟢 Met 🟡 Partially met: When the target has several milestones and some of them have been met but not all / When the target has not been met but exceeds 95% of the target. 🔴 Unmet

## 1.4.6 Sustainability report

### 1.4.6.1 INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

To guarantee the quality and reliability of the information included in the Sustainability Report, Ence has established **Internal Controls over Sustainability Reporting** (ICSR) The ICSR are defined as the set of processes carried out by the company to ensure the integrity and reliability of the sustainability information.

The ICSR have been defined considering the reporting requirements set out in the CSRD, the principles of the Global Reporting Initiative (GRI) sustainability reporting standards and the internal control principles applicable to non-financial reporting set out by COSO.

For the implementation of the ICSR, Ence has produced an **ICSR Manual** and identified the key processes related to sustainability reporting in order to respond to both mandatory and voluntary reporting requirements. The scope of the ICSR includes all processes and sub-processes and is applicable throughout the Group.

**SCIIS Processes**

- Administration
- Corporate Governance
- Environment
- Energy Management
- Human Capital
- Health and safety
- Supply chain
- Heritage Management
- Sustainability
- RD&I
- Commercial
- Compliance
- Communication

Each process is broken down into sub-processes with KPIs, for which specific files have been created that include their definition and the detailed methodology for obtaining, calculating and reporting them. The indicators integrated into the ICSR are managed through a comprehensive **digital reporting platform** that allows, among other functions, the recording of information, consultation of historical data, provision of evidence to support data in audits, and analysis of deviations. Two roles have been established for each indicator: the reporter, responsible for entering the data into the platform, and the validator, responsible for confirming the information recorded by the reporter. These flows between reporter and validator follow principles of segregation of duties in order to ensure efficient data validation.

In addition, a risk and control matrix has been drawn up for each process to assess the risks that could compromise the integrity and reliability of the information and to define specific actions to mitigate them. For each risk, at least one control has been defined, for which different variables are defined: the scope, the classification of the control (preventive/corrective); the type of execution of the control (manual/automatic); the evidence of execution of the control; the frequency of execution, and the person responsible for its execution.

**Main risks identified and mitigation strategies:**

| Risks | Controls |
|---|---|
| Errors in the calculation or estimation of indicators | • Training for those responsible for obtaining information.<br>• Update of the methodology for calculating the indicators in the ICSR sheets.<br>• Automation of KPIs to avoid errors in calculations.<br>• Protection of spreadsheets. |
| Data dump error between systems | • Review of SAP connections to continuous measurement systems (PI). |
| Error due to manual loading | • Segregation of duties (reporter-validator) for the review of data consistency. |
| Changes in legislation | • Periodic review of applicable legislation. |
| Inappropriate calibration of measuring instruments | • Improve calibration plans to include redundancy in critical equipment.<br>• Periodic calibration by Accredited Certification Bodies (ACBs). |
| Conversion factors and error in units used | • Review of variations between years.<br>• Segregation of duties (reporter-validator) for the review of data consistency.<br>• Protection of spreadsheets. |
| Error or inconsistency between data used internally and data generated by third parties | • Reconcile information obtained from third parties with that used for internal management. |

The ICSR is subject to internal audits to ensure the proper functioning of the system. The results of the ICSR Internal Audits are submitted to the Audit Committee on an annual basis. In 2025, the main milestone in the context of the ICSR has been the inclusion in the different processes of the indicators corresponding to the bio-methane plant La Galera, acquired at the end of 2024.

## 1.4.6.2 ABOUT THIS REPORT

### Scope

The information included in the 2025 Sustainability Report pertains to all the activities carried out by Grupo Ence Energía y Celulosa S.A. from 1 January to 31 December 2025. The scope of this report is the same as that of the Consolidated Annual Accounts of Ence Energía y Celulosa, S.A. and its subsidiary companies. Any exceptions to this scope are detailed in the corresponding sections of this report. The scope of the value chain activities included for each of the material issues identified is detailed in the individual chapters.

The Sustainability Report constitutes the **Consolidated Non-Financial Information Statement (NFIS) and Sustainability Statement of Ence Energía y Celulosa, S.A. and subsidiaries for the 2025 financial year,** and although it is presented separately, forms part of the consolidated Management Report of Ence Energía y Celulosa, S.A. and subsidiaries. The content of the report has been defined in response to Law 11/2018 of 29 December, which amends the Commercial Code, the revised text of the Capital Companies Act approved by Royal Legislative Decree 1/2010 of 2 July, and Act 22/2015 of 20 July, on Accounts Auditing in the area of non-financial information and diversity. The Non-Financial Information Statement contains information additional to that required by relevant current commercial legislation, specifically Sustainability Information in accordance with the provisions of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 on corporate sustainability reporting (CSRD). This sustainability information has also been subject to limited verification. **Appendix III** to this report contains a table specifying the section of the report relating to each specific requirement set out in Law 11/2018 or explaining its omission if applicable. Furthermore, section *1.4.6.3 Table of CSRD* contents of this report contains a table specifying the section of the report relating to each specific requirement indicated or explaining its omission if applicable.

The report also responds to the disclosure requirements set out in **Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council** of 18 June 2020 on establishing a framework to facilitate sustainable investment (Taxonomy) and the delegated regulations implementing it (*2.1 Taxonomy*)**.**

Events subsequent to the end of the reporting period may be found in Note 36 to Ence's Annual Accounts for 2025. Information on the registration of a Sustainability-Linked Bond Programme with the MARF is included.

**Reference standards**

The balanced, reasonable presentation of Ence's performance required the application of the following principles:

- The principles for defining the content of the report, in terms of stakeholder inclusiveness, sustainability context, materiality, and completeness.
- The principles for defining the quality of the report, in terms of accuracy, balance, clarity, comparability, reliability, and timeliness.
- With reference to compliance with the principle of materiality, the guidelines established by CSRD (*1.4.4. Analysis of double materiality*)

With this materiality analysis, Ence ensures that both the priorities set out in its 2024-2028 Sustainability Master Plan and the contents of this report are aligned with the reporting expectations and requirements of its stakeholders. The sections of this report that address the material aspects identified by Ence are detailed below:

| Material issue - Ence Group | Report section |
|---|---|
| Climate change mitigation and adaptation | *2.2 Climate change* |
| Pollution prevention | *2.3 Pollution* |
| Water management | *2.4 Water resources* |
| Biodiversity | *2.5 Biodiversity* |
| Circular economy | *2.6 Circular economy* |
| Human capital management | *3.1 Internal staff* |
| Human rights in the value chain | *3.2 Workers in the value chain* |
| Relationship with local communities | *3.3 Affected communities* |
| Added value for the customer | *3.4 Customers* |
| Responsible Governance | *4.1 Good Corporate Governance* |

### Due Diligence Statement

Ence's due diligence process makes it possible to identify, prevent, mitigate and account for the company's potential or actual impacts on each of the material aspects. Due diligence requires a careful and systematic assessment to ensure that legal and ethical principles are complied with in all operations. This includes identifying the risks and impacts associated with the value chain. This is a continuous process that cuts across all operations. The main elements of the due diligence process and the section of this report where the relevant information is disclosed are set out below:

| Essential elements of due diligence | Report section |
|---|---|
| Integration of due diligence into governance, strategy and business model | Sections *4.2.3 Business conduct policies and business Conduct Policies and Procedures* and *4.4.3 Due diligence* describe Ence's main rules that set out its values and principles of action. These standards establish the governance model and guarantee the integration of due diligence into Ence's strategy and business model. |
| Working together with affected stakeholders at all key stages of due diligence | Sections *1.4.4 Dual materiality analysis* and *1.4.3 Stakeholder engagement* describe the processes of dialogue and stakeholder engagement. |
| Identification and assessment of adverse impacts | Each chapter defines the process for identifying and assessing IROs for material issues. In addition, the mitigation measures and indicators established to monitor material issues are detailed. |
| Taking measures to deal with such adverse events | |
| Monitoring the effectiveness of these efforts and communication | |

### Contact information

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### 1.4.6.3 Table of CSRD contents

| Disclosure requirement | | Reference |
|---|---|---|
| **GENERAL INFORMATION** | | |
| **ESRS 2 - General Information** | | |
| BP-1 | General basis for preparation of the sustainability statement | **1.4.6.2 About this report** |
| BP-2 | Disclosure in relation to specific circumstances | Time horizons:<br>The time intervals defined are short term (one year), medium term (up to five years) and long term (more than five years), in line with ***1.4.4 Double materiality analysis*** and ***Appendix II Double materiality assessment***.<br>In cases where different time horizons have been selected, this has been specified and explained in the specific section, as in the case of Climate Risks.<br>Sources of estimation and uncertainty of outcome<br>When making calculations, Ence adheres to the following quantification hierarchy: (1) direct measurements; (2) calculations from specific activity data; and (3) estimates based on reference literature sources.<br>Specific information on the quantification methodology used to provide specific metrics for each aspect has been incorporated in the environmental and social chapters.<br>Uncertainty derives from the measurement equipment itself or from the calculation methodologies or estimates used. In this regard, uncertainty may be associated with the activity data (primary or secondary) and the conversion and emission factors used. To minimise uncertainty, Ence follows the quantification hierarchy and uses reference standards when making estimates. An example of this is the calculation of Scope 3 greenhouse gas emissions. In this case, some of the categories have limited access to activity data information (e.g. supplier or customer data) and Ence follows the guidelines established by GHG Protocol and ISO 14064 to perform the calculations and estimates, basing the data, for example, on billing amounts and making use of bibliographic emission factors from recognised sources (IPCC, OECC). In addition, to reduce the level of uncertainty, it carries out an annual verification of the Carbon Footprint with a reasonable level of assurance, the maximum level. For more information website. In addition, for other environmental data, in the case of the bio-factories, Ence prepares annual Environmental Declarations, which are also audited by an independent external party. For more information website.<br>Changes in the preparation or presentation of sustainability information<br>If, during the preparation of this report, errors have been detected in the data referring to previous financial years, these have been updated and a note has been included indicating that they have been recalculated.<br>Information derived from other legislation or from other generally accepted sustainability standards<br>This report complies with Law 11/2018 on Non-Financial Information; the content of this law, and the sections that respond to it, are included in ***Appendix IV 11/2018 Law and CSRD Index.*** In addition, information in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) has been included in chapter ***2.2 Climate change.***<br>Apart from this, information is included to meet the requirements of Article 8 of Regulation (EU) 2020/852 on European Taxonomy (see ***section 2.1 Taxonomy***).<br>In addition, ***Appendix VI. Connection of the information with other European standards*** also includes information on the data included in the Sustainability Report included in other European regulations.<br>Incorporation by reference<br>In addition to the ESG risks included in section ***1.4.6.6 Process for identifying, assessing and managing ESG risks,*** information on the other risks of the Corporate Risk Map is included in Section E of the Annual Corporate Governance Report (link).<br>For more information on the information included in section ***4.1 Good Corporate Governance***, please refer to the Annual Corporate Governance Report (ACGR) and the Annual Report on Directors' Remuneration (link).<br>Use of phasing-in arrangements in accordance with Appendix C to ESRS 1<br>In 2025 Ence has not included information on the financial effects of the risks and opportunities of the various environmental and social aspects, specifically those referring to disclosure requirements E1-9, E2-6, E3-5, E4-6 and E5-6. In addition, the information relating to the characteristics of non-employees in own workforce, corresponding to disclosure requirement S1-7, has also not been incorporated. Apart from this, due to the complexity of obtaining all related information on the value chain and in particular on value chain workers (ESRS S2), such information as is available is included in this report and the remainder will be phased in. This is in line with both the use of the phase-in provisions of Appendix C of ESRS 1 and the provisions of the Delegated Regulation "quick fix", implemented in July 2025 and published in November 2025. |
| GOV-1 | The role of administrative, management and supervisory bodies in relation to sustainability issues | ***1.4.1 Governance bodies as regards sustainability*** |
| GOV-2 | Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | ***1.4.1 Governance bodies as regards sustainability*** |

| Disclosure requirement | | Reference |
|---|---|---|
| GOV-3 | Integration of sustainability-related performance in incentive schemes | *1.4.1.1 Sustainability objectives linked to variable remuneration* |
| GOV-4 | Due Diligence Statement | ▪ *Due Diligence Statement* |
| GOV-5 | Risk management and internal controls over sustainability reporting | ▪ *1.4.6.4 Risk management approach*<br>▪ *1.4.6.5 Roles and responsibilities*<br>▪ *1.4.6.6 ESG risk identification, assessment and management process* |
| SBM-1 | Strategy, business model and value chain | ▪ *1.3 Strategic framework*<br>▪ *1.4.5 2024-2028 Sustainability Master Plan and annual targets* |
| SBM-2<br>SBM-3 | Interests and views of stakeholders<br>Material impacts, risks and opportunities and their interaction with strategy and business model | ▪ *General information: 1.4.4 Double materiality analysis*<br>▪ *Climate change (E1): 2.2.2 Impacts, risks and opportunities*<br>▪ *Pollution (E2): 2.3.1 Impacts, risks and opportunities*<br>▪ *Water and marine resources (E3): 2.4.1 Impacts, risks and opportunities*<br>▪ *Biodiversity and ecosystems (E4): 2.5.1 Impacts, risks and opportunities*<br>▪ *Circular economy (E4): 2.6.1 Impacts, risks and opportunities*<br>▪ *Own workforce (S1): 3.1.1 Impacts, risks and opportunities*<br>▪ *Workers in the Value Chain (S2): 3.2.1 Impacts, risks and opportunities*<br>▪ *Affected communities (S3): 3.3.1 Impacts, risks and opportunities*<br>▪ *Customers: 3.4.1 Impacts, risks and opportunities*<br><br>During the preparation of the double materiality analysis, Ence has assessed the current and expected financial effects of the risks and opportunities during the determination of financial materiality (see section *1.4.4 Double materiality analysis*). |
| IRO-1 | Description of the processes for identifying and assessing material impacts, risks and opportunities | *1.4.4 Double materiality analysis* |
| IRO-2 | Disclosure requirements in ESRS covered by the undertaking's sustainability statement | *1.4.6.3 Table of CSRD contents* |

| Disclosure requirement | | Reference |
|---|---|---|
| **INFORMATION ON ENVIRONMENTAL ISSUES** | | |
| **ESRS E1 – Climate Change** | | |
| ESRS 2 GOV-3 | Integration of sustainability-related performance in incentive schemes | *1.4.1.1 Sustainability objectives linked to variable remuneration* |
| E1-1 | Transition plan for climate change mitigation | *2.2.4.2 Decarbonisation Plan: emission reduction targets, actions and resources* |
| ESRS 2 SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | *2.2.4.1 Integrating climate action into the business model* |
| ESRS 2 IRO-1 | Description of the processes for determining and assessing IROs related to climate change | *2.2.2 Impacts, risks and opportunities* |
| E1-2 | Policies related to climate change mitigation and adaptation | *2.2.3 Climate Change Policy* |
| E1-3 | Actions and resources in relation to climate change policies | *2.2.4.2 Decarbonisation Plan: emission reduction targets, actions and resources* |
| E1-4 | Targets related to climate change mitigation and adaptation | *2.2.4.2 Decarbonisation Plan: emission reduction targets, actions and resources* |
| E1-5 | Energy consumption and mix | *2.2.5.1 Energy consumption* |
| E1-6 | Gross scopes 1, 2 and 3 and total GHG emissions | *2.2.5.3 Carbon footprint 2025*<br>*2.2.5.5 EU Emissions Trading* |
| E1-7 | GHG removals and GHG mitigation projects financed through carbon credits | *2.2.5.4 Avoided emissions, forest sinks and offset credits* |
| E1-8 | Internal carbon pricing | *2.2.5.5 Internal carbon price* |
| E1-9 | Anticipated financial effects from material physical and transition risks and potential climate-related opportunities | *(1)* |

| Disclosure requirement | | Reference |
|---|---|---|
| **ESRS E2 - Pollution** | | |
| ESRS 2 IRO-1 | Description of the processes for determining and assessing material IROs relating to pollution | *2.3.1 Impacts, risks and opportunities* |
| E2-1 | Policies related to pollution | *2.3.2 Environmental policy* |
| E2-2 | Actions and resources related to pollution | ▪ *Cross-cutting mitigation measures*<br>▪ *2.3.3 Objectives, actions and resources: Actions and resources* |
| E2-3 | Targets related to pollution | ▪ *2.3.3 Objectives, actions and resources: Strategy and Objectives* |
| E2-4 | Air, water and soil pollution | *2.3.4 Metrics* |
| E2-5 | Substances of concern and substances of very high concern | Ence does not use, nor does it plan to start using, substances of concern or very high concern in its processes in accordance with Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). |
| E2-6 | Anticipated financial effects from pollution-related impacts, risks and opportunities related to pollution | *(1)* |

| | | |
|---|---|---|
| **ESRS E3 Water and marine resources** | | |
| ESRS 2 IRO 1 | Description of the processes for determining and assessing material IROs relating to pollution | *2.4.1 Impacts, risks and opportunities* |
| E3-1 | Policies relating to water and marine resources | *2.4.2 Environmental policy* |
| E3-2 | Actions and resources related to water and marine resources | *2.4.3 Objectives, actions and resources: Actions and resources* |
| E3-3 | Targets related to water and marine resources | *2.4.3 Objectives, actions and resources: Objectives* |
| E3-4 | Water consumption | *2.4.4 Metrics* |
| E3-5 | Anticipated financial effects from water and marine resources-related impacts, risks, and opportunities | *(1)* |

| Disclosure requirement | | Reference |
|---|---|---|
| **ESRS E4 – Biodiversity and ecosystems** | | |
| E4-1 | Transition plan and consideration of biodiversity and ecosystems in strategy and business model | ▪ *2.5.3.1 Biodiversity Plan* |
| ESRS 2 SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | ▪ *2.5.1 Impacts, risks and opportunities* |
| ESRS 2 IRO-1 | Description of processes for determining and assessing biodiversity and ecosystem-related IROs | ▪ *2.5.1 Impacts, risks and opportunities* |
| E4-2 | Policies related to biodiversity and ecosystems | ▪ *2.5.2 Biodiversity Policy* |
| E4-3 | Actions and resources related to biodiversity and ecosystems | ▪ *2.5.3 Objectives, actions and metrics*<br>▪ *Cross-cutting mitigation measures* |
| E4-4 | Targets related to biodiversity and ecosystems | ▪ *2.5.3 Objectives, actions and metrics*<br>▪ *2.5.3.2 Other objectives and metrics* |
| E4-5 | Impact metrics related to changes in biodiversity and ecosystems | ▪ *2.5.3.2 Other objectives and metrics*<br>▪ *Management area in protected natural areas* |
| E4-6 | Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities | ▪ *(1)* |

| | | |
|---|---|---|
| **ESRS E5 - Resource Use and Circular Economy** | | |
| ESRS 2 IRO-1 | Description of the processes for determining and assessing IROs related to resource use and the circular economy | ▪ *2.6.1 Impacts, risks and opportunities* |
| E5-1 | Policies related to resource use and the circular economy | ▪ *2.6.2 Environmental policy* |
| E5-2 | Actions and resources related to resource use and the circular economy | ▪ *2.6.3 Objectives, actions and resources: Actions and resources* |
| E5-3 | Targets related to resource use and the circular economy | ▪ *2.6.3 Objectives, actions and resources: Strategy and Objectives* |
| E5-4: | Resource inflows | ▪ *2.6.4 Metrics: Consumption of raw materials* |
| E5-5 | Resource outflows | ▪ *2.6.5 Metrics: Waste* |
| E5-6 | Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities | ▪ *(1)* |

| Disclosure requirement | | Reference |
|---|---|---|
| **INFORMATION ON SOCIAL ISSUES** | | |
| **ESRS S1 - Own workforce** | | |
| ESRS 2 SBM-2 | Interests and views of stakeholders | *3.1.4 Dialogue and Participation Processes* |
| ESRS 2 SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | ▪ *3.1.1 Impacts, risks and opportunities*<br>▪ *3.1.3 Strategic Plan for People*<br>▪ *3.1.8.3 Risk prevention and management model* |
| S1-1 | Policies relating to own workforce | ▪ *3.1.2 Policies related to in-house employees*<br>▪ *3.1.8.2 Health and Safety Policy and principles of action* |
| S1-2 | Processes for engaging with own workforce and workers' representatives about impacts | *3.1.4 Dialogue and Participation Processes* |
| S1-3 | Processes for remedying negative impacts and channels for own workforce to raise concerns | *3.1.4 Dialogue and Participation Processes*<br>*3.1.4.3 Integrity Line* |
| S1-4 | Taking action on impacts on own workforce, and approaches to mitigating risks and pursuing opportunities | *3.1.4.3 Integrity Line* |
| S1-5 | Targets related to managing negative impacts, advancing positive impacts, and managing risks and opportunities | *3.1.3 Strategic People Plan Structure and objectives 3.1.8.5 Targets and performance* |
| S1-6 | Characteristics of the company's employees | *3.1.5.1 Workforce profile 3.1.5.2 Quality employment* |
| S1-8 | Coverage of collective bargaining and social dialogue | *3.1.7.1 Right to association and collective bargaining and social dialogue* |
| S1-9 | Diversity metrics | *3.1.6.2 Diversity indicators* |
| S1-10 | Adequate wages | *Remuneration* |
| S1-11 | Social protection | *3.1.7.2 Welfare plans* |
| S1-12 | Persons with disabilities | *3.1.6.4 Persons with different abilities* |
| S1-13 | Training and skills development metrics | *3.1.5.3 Managing, attracting and retaining talent* |
| S1-14 | Health and safety metrics | *3.1.8 Safety and health. Accidents. Accident rates* |
| S1-15 | Work-life balance metrics | *3.1.6.3 Work-life balance* |
| S1-16 | Remuneration metrics (pay gap and total remuneration) | ▪ *Remuneration*<br>▪ *Pay gap* |
| S1-17 | Incidents, complaints and serious human rights incidences | *3.1.4.3 Integrity Line* |
| **ESRS S2 - Workers in the Value Chain** | | |
| ESRS 2 SBM-2 | Interests and views of stakeholders | *3.2.2 Supplier dialogue process* |
| ESRS 2 SBM-3 | Material IROs and their interaction with the strategy and business model | *3.2.1 Impacts, risks and opportunities* |
| S2-1 | Policies related to value chain workers | *3.2.3 Policies related to value chain workers* |
| S2-2 | Processes for engaging with value chain workers about impacts | *3.2.2 Supplier dialogue process* |
| S2-3 | Processes for remedying negative impacts and channels for value chain workers to raise concerns | ▪ *3.2.1 Impacts, risks and opportunities*<br>▪ *3.2.5 Channels for reporting concerns and incidents* |
| S2-4 | Taking action on impacts on value chain workers, and approaches to mitigating risks and pursuing opportunities | *3.2.4 Human rights in the value chain* |
| S2-5 | Targets related to managing negative impacts, advancing positive impacts, and managing risks and opportunities | *3.2.4 Human rights in the value chain* |
| **ESRS S3 - Affected communities** | | |
| ESRS 2 SBM-2 | Interests and views of stakeholders | *3.3 Affected communities* |
| ESRS 2 SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | *3.3.1 Impacts, risks and opportunities* |
| S3-1 | Policies related to affected communities | *3.3.3 Policies related to affected communities* |
| S3-2 | Processes for engaging with affected communities about impacts | *3.3.2 Processes and channels for dialogue with local communities* |
| S3-3 | Processes for remedying negative impacts and channels for affected communities to raise concerns | *3.3.4 Listening processes and remediation of negative impacts* |
| S3-4 | Taking action on impacts on affected communities, and approaches to mitigating risks and pursuing opportunities | *3.3.1 Impacts, risks and opportunities*<br>*3.3.5 Adoption of measures for the mitigation of negative impacts* |

| Disclosure requirement | | Reference |
|---|---|---|
| **Entity-Specific (ES) - Customers** | | |
| ES-SBM2 | Interests and views of stakeholders | *3.4 Customers*<br>*3.4.3 Processes and channels for dialogue with customers* |
| ES-SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | *3.4.1 Impacts, risks and opportunities* |
| ES-1 | Policies relating to customers | *3.4.2 Customer-related policies* |
| ES -2 | Processes for engaging with customers about impacts | *3.4.3 Processes and channels for dialogue with customers*<br>*3.4.4 Listening processes and remediation of negative impacts* |
| ES -3 | Processes for remediating negative impacts and channels for customers and end-users to raise concerns | *3.4.4 Listening processes and remediation of negative impacts* |
| ES -4 | Taking action on impacts on customers, and approaches to mitigating risks and pursuing opportunities | ▪ *3.4.5 Adoption of measures and earmarked resources* |
| ES-5 | Targets related to managing material adverse events, driving positive events and managing material risks and opportunities | ▪ *3.4.6 Objectives and metrics* |
| **INFORMATION ON GOVERNANCE** | | |
| **ESRS G1 - Business Conduct** | | |
| ESRS 2 GOV-1 | The role of the administrative, management and supervisory bodies | *4.2.1 Governance bodies as regards business conduct* |
| ESRS 2 IRO-1 | Description of the processes for determining and assessing IROs | *4.2.2 Impacts, risks and opportunities* |
| G1-1 | Business conduct policies and corporate culture | *4.2.3 Business conduct policies and procedures* |
| G1-2 | Management of relations with suppliers | *4.4 Supply chain monitoring* |
| G1-3 | Prevention and detection of corruption or bribery | *4.3 Prevention of corruption and bribery* |
| G1-4 | Incidents of corruption or bribery | *4.3 Prevention of corruption and bribery* |
| G1-5 | Political influence and lobbying activities | *4.6 Relationship with administrations and other stakeholders* |
| G1-6 | Payment practices | *4.4.4 Supplier payment practices* |

(1) In 2025 Ence has not included information on the financial effects of the risks and opportunities of the various environmental and social aspects, specifically those referring to disclosure requirements E1-9, E2-6, E3-5, E4-6 and E5-6. In addition, the information relating to the characteristics of non-employees in own workforce, corresponding to disclosure requirement S1-7, has also not been incorporated. Apart from this, due to the complexity of obtaining all related information on the value chain and in particular on value chain workers (ESRS S2), such information as is available is included in this report and the remainder will be phased in. This is in line with both the use of the phase-in provisions of Appendix C of ESRS 1 and the provisions of the Delegated Regulation "quick fix", implemented in July 2025 and published in November 2025.

## 1.4.6.4 RISK MANAGEMENT APPROACH

Ence manages risks through its Risk Management System (RMS), a comprehensive process aimed at identifying, analysing, prioritising, managing and monitoring circumstances that may pose a threat to the Group's operations and objectives.

The scope of the RMS includes Ence and all Group companies, all of their businesses and the activities of their corporate areas, and is defined and regulated in the Risk Management and Control Policy and the Risk Management Procedure.

In defining its RMS, Ence followed the guidelines of international reference frameworks, in particular COSO's Enterprise Risk Management - Integrated Framework. It is periodically reviewed so as to incorporate the best practices in this area.

Ence continuously identifies and assesses new risks, monitors those that are already detected, registers those that have materialised and finalises those to which it is no longer exposed. The RMS covers risks for strategic, operational, reporting and compliance objectives, and categorises risks according to their nature: operational, financial and ESG, including those related to climate change. ESG risk management is detailed below.

As a result of this process, the **Risk Register** (list of current, materialised and closed risks) and the **Risk Map** (representation of risks according to their probability of occurrence and their impact on the company) are constructed and updated. When assessing the impact, the "owners" of the risks assess the potential seriousness of the risk in gross terms from different perspectives (health and safety, legal consequences, impact on the environment, economic impact, reputational impact and impact on the organisation's objectives). The impact on each of these stakeholders is assessed on a five-level scale from "insignificant" to "very significant". In the case of the probability of occurrence, the risks are assessed on a percentage scale of probability of five levels as well, from "rare" to "almost certain". Once the most relevant risks have been determined, in terms of impact and probability, two additional factors are analysed: speed (time between the occurrence of the risk and its expected impact) and vulnerability (indicative of the effectiveness of the control actions implemented). On the basis of this risk assessment, the area heads establish the appropriate action and control plans to mitigate, reduce or transfer the risk in question. The risk owners then go on to assess the net or residual risk, i.e. the gross risk minus the effect of the mitigating measures once they have been defined.

The Risk Map is regularly updated and submitted to the Management Committee for review and subsequently to the Audit Committee for approval and reporting to the Board of Directors. Depending on the results of the Risk Map, the Internal Audit Department prepares the Internal Audit Plan for the following financial year, which establishes measures to check that risks are properly assessed and that the actions envisaged in the mitigation plans are being carried out.

## 1.4.6.5 ROLES AND RESPONSIBILITIES

The risk management process involves all areas of the company, each with specific responsibilities:
**Board of Directors:** defines risk management policy and oversees internal control and reporting systems. It establishes principles and controls to keep risks within the levels accepted by the company.

**Management Committee**: works with the Board of Directors to define risk management principles and establish internal control systems that keep impact within the accepted level. The Committee reviews the Risk Register and Map before submitting them to the Audit Committee for approval.

**Audit Committee:** assists the Board in supervising the internal control and risk management systems, including the internal control systems for financial reporting (ICFR) and for Sustainability reporting (ICSR).

**Internal Audit Directorate:** directs daily oversight of the RMS, defines criteria and procedures for risk management and periodic reporting of risks to the Board through the Audit Committee. It also verifies the application of control policies and principles and monitors compliance with internal control.

**Ethics and Compliance Department:** defines and updates Ence's criminal risk map, identifying activities susceptible to criminal offences that must be prevented. Reports to the Audit Committee of the Board of Directors.

The business area managers are the "owners" of their risks and play a continuous risk management role at the most operational level, from the review of the assessment to the definition of the corresponding mitigation measures.

Under this general scheme of action, the correct coordination of all the participants in the various phases of execution, monitoring, control, supervision and reporting of the measures adopted for risk management is guaranteed.

### 1.4.6.6 ESG RISK IDENTIFICATION, ASSESSMENT AND MANAGEMENT PROCESS

Risks arising from ESG aspects are part of the company's RMS. In fact, Ence has been analysing risks related to environmental aspects, health and safety of its workers or social licence to operate since the beginning of the formalisation of its RMS. Since then, Ence has gradually strengthened the robustness of the analysis of the ESG risks included in the RMS and the Corporate Risk Map. In this regard, since 2020, there has been a specific working group for the annual analysis of the risks arising from climate change. The group is chaired by the Chairperson and is composed of the General Managers of the pulp, energy and finance areas, as well as the heads of corporate sustainability, planning and control and internal audit. In addition, from 2024, the ESG risk identification process will be informed by the results of the double materiality analysis.

Furthermore, in 2025, the specific working group for climate risks expanded its scope to conduct a detailed review and analysis of all ESG risks. A total of 17 climate risks were identified (detailed in Chapter *2.2 Climate Change*) and 17 ESG risks. Of the 17 ESG risks, 53% are social, 35% are environmental and 12% are governance.

**ESG risks**

* Risk included in the analysis of Climate Risks

| | | |
|---|---|---|
| Environmental | Pollution | Fines/penalties for exceeding the permitted pollution limits |
| | Water and marine resources | Reduced availability of water resources (*) |
| | Biodiversity | Increase of salinity in the Navia bio-factory (*) |
| | | Penalties for non-compliance with forest management. Risk of loss of certification Equity |
| | | Loss of supplier certification |
| | Circular economy | Decrease in biomass availability due to stricter regulation |
| | Climate change | Detailed in chapter 2.2 Climate Change |
| Social | In-house staff | Strikes among in-house staff |
| | | Fines/sanctions for labour law issues |
| | | Fines/sanctions for safety and health issues |
| | Workers in the value chain | Strikes in the value chain |
| | | Suppliers' non-compliance with OHS — joint and several liability |
| | | Supplier environmental non-compliance. |
| | Affected communities | Project cancellation (bio-fertiliser and bio-methane business) due to social opposition. |
| | Customers | Loss of customers due to breach of contractual sustainability clauses |
| | In-house staff / Value chain / Customers | Data privacy breaches |
| Governance | Business conduct | Cases of corruption or bribery |
| | | Fines/sanctions for non-compliance with Integrity Line regulations |

Risks that are not included[5] in the RMS were added to the company's risk register. In addition, this analysis was used to update the double materiality analysis. This ensures that **Ence's global risk register and map are aligned with the double materiality analysis**, ensuring that all risks arising from material aspects are included in the company's RMS.

In the revision of the Risk Map, an owner has been assigned to each of the new risks, which have been assessed. The ESG risks, as well as the mitigation measures defined are detailed in the relevant chapters of this report.

For further information on Ence's management system and risks not related to ESG aspects, please refer to the following section "**E. RISK MANAGEMENT AND CONTROL SYSTEMS**" of the company's Annual Corporate Governance Report at this link.

5. Many of these new risks are different from those previously analysed in the RMS, in that most of them are risks that may materialise in the medium or long term and their analysis requires the development of scenarios, unlike the risks included in the register, which were defined from a fundamentally operational perspective.

# 02 | ENVIRONMENT



# 02

# ENVIRONMENT

## 2.1 Taxonomy

Ence has updated the **eligibility analysis** of its activities, with the goal of identifying those that can substantially contribute to one of the six environmental objectives established by the EU Taxonomy (Regulation 2020/852).

- Climate change mitigation
- Adaptation to climate change
- Transition to a circular economy
- Protection and restoration of biodiversity and ecosystems
- Sustainable use and protection of water and marine resources
- Pollution prevention and control

Specifically, **activities have been identified that have the potential to contribute** to the first four objectives because they comply with one of the definitions in the Delegated Regulations implementing Regulation 2020/852. For each of them, their **degree of alignment** has been assessed by considering the technical criteria of substantial contribution, the principle of no significant harm to other objectives (DNSH) and compliance with minimum social safeguards.

The analysis covered all the Group companies included in the scope of consolidation corresponding to the business lines of pulp production, sustainable forest management, renewable energy generation with biomass and bio-methane production. The objective has been to calculate the proportion of eligible activities aligned with the Taxonomy in terms of turnover (sales), investments in fixed assets (CapEx) and operating expenses (OpEx). The methodological detail for the construction of these KPIs is provided in ***Appendix I Construction of taxonomy KPIs***.

### 2.1.1 Eligibility and alignment analysis

The following Delegated Regulations have been taken into account for the eligibility and alignment analysis:

- Delegated Regulation (EU) 2021/2139 of 4 June 2021, which includes eligibility and alignment criteria for **climate change mitigation and adaptation objectives.**
- Delegated Regulation (EU) 2022/1214 of 9 March 2022, which complements Appendixes 1 and 2 of the aforementioned Delegated Regulation with a series of economic activities related to the use of **gaseous fossil fuels and nuclear energy**.
- Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing **additional technical screening criteria** for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation.
- Delegated Regulation (EU) 2023/2486 of 27 June 2023, which includes the eligibility and alignment criteria for the **four non-climate environmental objectives** (relating to the protection of water and marine resources, the transition to a circular economy, the prevention and control of pollution, and the protection and restoration of biodiversity and ecosystems).
- Delegated Regulation (EU) 2026/73 of 4 July 2025 amending Delegated Regulation (EU) 2021/2178 as regards **simplifying the content** and presentation of information to be disclosed on environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards **simplifying certain technical** selection **criteria** for determining whether economic activities do not cause significant harm to **environmental objectives.**

The following is a list of taxonomic activities applicable to Ence and their analysis of eligibility and alignment with the six environmental objectives:

| Taxonomic activity | Eligibility Analysis \| Ence Application | Alignment analysis (6) |
|---|---|---|
| **Objective 1 Climate change mitigation (7)** | | |
| **CCM 1.3 – Forest management** | Activities related to silviculture and other forestry activities, wood harvesting (including the sale of wood to third parties) and support services for silviculture. Ence Terra and Silvasur are eligible. Other Group forestry companies (Ibersilva Servicios, ENCE I&D, Liptoflor and Casefor) are not considered eligible since their activity does not exactly fit the definition of the economic activity "forest management" or any other of the three activities included in Section "1. Silviculture" as defined in Delegated Regulation 2021/2139. | All Eligible Companies are aligned. |
| **CCM 4.1 – Electricity generation using solar photovoltaic technology** | Generation of electricity by solar photovoltaic technology, in the case of Ence's solar photovoltaic plants. | All Eligible Companies are aligned. |
| **CCM 4.8 – Electricity generation from bioenergy** | Activity linked to the generation of renewable electricity from biomass at the plants in Huelva (HU41, HU46, HU50), Mérida, La Loma, Enemansa, Puertollano, Lucena (the biomass generation facility).<br><br>In the case of Lucena, which comprises a biomass electricity generation plant and a natural gas cogeneration plant, only those projects and items corresponding to the biomass generation plant are considered eligible under this activity (CCM 4.8). Those corresponding to the gas cogeneration plant and those serving both are considered ineligible. Natural gas-fired cogeneration activities are assessed in activity CCM/CCA 4.30. | All Eligible Companies are aligned except Puertollano. In the case of Puertollano, the activity is not aligned because it does not meet one of the criteria of "DNSH 5 on Pollution Prevention and Control". Specifically with regard to the emission values set for the CO parameter. See section ***Action plan for non-aligned activities.*** |
| **CCM 4.13 – Manufacture of biogas and biofuels for use in transport and of manufacture of bioliquids** | Activity linked to the production projects of renewable fuels (e-methanol) at the Mérida, Huelva and Puertollano plants. | All eligible Companies are aligned. |
| **CCM 4.20 – Cogeneration of heat/cool and power from bio-energy** | Activity linked to cogeneration from biomass at the Navia and Pontevedra bio-factories. These facilities are also active in pulp production (non-eligible activity). In the latter case and following a conservative criterion, only those projects unequivocally related to the activity 4.20 Cogeneration of heat/cool and power from bioenergy will be considered eligible and not those that can also serve the cellulose production activity. | All eligible Companies are aligned. |
| **CCM 4.24 – Heat production from bioenergy.** | Through Magnon Servicios Energéticos, Ence produces renewable thermal energy (heat) from biomass by operating boilers at its customers' industrial facilities. | The eligible company is aligned. |
| **CCM 5.9 – Material recovery from non-hazardous waste.** | The As Pontes project, currently in the design phase, includes the construction of a bioplant for the production of recycled fibre bleached from recovered cardboard and paper. | The eligible company is aligned. |
| **CCM 5.1 – Construction, extension and operation of water collection, treatment and supply systems** | Ence is carrying out projects to improve water collection and supply points at both the Navia and Pontevedra bio-factories. | All eligible projects are aligned. |

6. An activity is considered to be aligned when it meets the criteria of substantial contribution, the principles of no significant harm to other objectives (DNSH) and the minimum social safeguards defined in the Taxonomy Regulation and its Delegated Regulations.
7. All the Ence Group's taxonomic activities that are eligible for the climate change mitigation and adaptation objectives are aligned with both the climate change mitigation and adaptation objectives, except for taxonomic activity 4.30, which is aligned only with the adaptation objective. For the rest of the taxonomic activities, to avoid double counting, 100% of their alignment is allocated to the mitigation objective.

| Taxonomic activity | Eligibility Analysis \| Ence Application | Alignment analysis |
|---|---|---|
| CCM 5.3 – Construction, extension and operation of waste water collection and treatment systems | Ence is carrying out wastewater treatment improvement projects at the Pontevedra bio-factory's own water treatment plant. | All eligible projects are aligned. |
| CCM 7.6 – Installation, maintenance and repair of renewable energy technologies | Ence has photovoltaic solar panels for self-consumption at the Huelva and Puertollano plants. | All eligible projects are aligned. |
| CCA 4.30 – High-efficiency co-generation of heat/cool and power from fossil gaseous fuels | Activity related to the operation of the natural gas cogeneration plant at the Lucena facility. | Lucena is not aligned, since it does not comply with the requirements related to CO2 emissions per kWh produced and measures related to methane leakage. See section ***Action plan for non-aligned activities.*** However, this activity is aligned with objective CCA4.30 as detailed below. |
| Objective 2 Adaptation to climate change | | |
| CCA 4.30 – High-efficiency co-generation of heat/cool and power from fossil gaseous fuels | Activity related to the operation of the natural gas cogeneration plant at the Lucena facility (8). | The eligible Lucena company is aligned. |
| Objective 3 Transition to a circular economy | | |
| CE 2.2 – Production of alternative water resources for purposes other than human consumption | Project related to the recirculation of effluent from the Pontevedra bio-factory and regeneration of water from the discharge. | The eligible project is aligned. |
| CE 2.5 - Recovery of bio-waste by anaerobic digestion or composting | Development of bio-methane generation projects using agricultural and livestock waste. | Non-aligned, see section ***Action plan for non-aligned activities.*** |
| Objective 4 Protection and restoration of biodiversity and ecosystems | | |
| BIO 1.1 - Conservation, including restoration of habitats, ecosystems and species | Ecosystem restoration activities carried out by Ence in its forestry assets. | These activities are not aligned because they do not comply with the CTS related to the characterisation of the main species (list of species, size of populations, etc.) throughout the Conservation Area Network. See section ***Action plan for non-aligned activities.*** |

In addition to the assessment of the technical selection criteria and the DNSH criteria, in the process of verification of this report, Ence demonstrated that it complied with the **Minimum Social Safeguards** as regards Human Rights, Corruption, Responsible Taxation, and Defence of Competition. To this end evidence was provided of the policies, systems and procedures that Ence has in place for these safeguards. Evidence has also been provided to demonstrate that the company or its senior management has not been convicted in court cases regarding human rights abuses, corruption or bribery, tax evasion or violation of competition laws.

8. Bioenergía Santamaría (Lucena)'s sales of energy from cogeneration with natural gas are in principle eligible as the activity falls under activity CCM 4.30, but as it is an adaptation activity, these sales are not included in the eligibility report. This criterion is In line with the provisions of point 5 of Commission Notice 2022/C 385/01 on the interpretation of certain legal provisions of the Disclosures Delegated Act under Article 8 of EU Taxonomy Regulation on the reporting of eligible economic activities and assets, to the effect that for adaptation activities only the contribution in terms of Opex and Capex is reported, but not turnover (sales).

## 2.1.2 Results Tables

| Sales 2025 | | | | Substantial contribution criteria | | | | | | DNSH Criteria | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Economic Activities (1) | Codes (2) CCM; CCA; WTR; CE; PPC; BIO + Code activity | Turnover (3) € | Turnover Ratio for 2025 (3) % | Climate change mitigation (5) | Climate change adaptation (6) | Water (7) | Pollution (8) | Circular economy (9) | Biodiversity (10) | Climate change mitigation (11) | Climate change adaptation (12) | Water (13) | Pollution (14) | Circular economy (15) | Biodiversity (16) | Minimum safeguards (17) | Proportion of Taxonomyaligned (A.1.) or eligible (A.2.) Turnover, 2024 (18) | Category enabling activity (19) | Category transitional activity (20) |
| A. TAXONOMY-ELIGIBLE ACTIVITIES | | | | | | | | | | | | | | | | | | | |
| A.1. Environmentally sustainable activities (Taxonomy-aligned) | | | | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| Generation of electricity from bioenergy (Cener, Magnon Green Energy, Ence Energía Huelva, Ence Energía Huelva II, Ence Energía Extremadura, Energía de La Loma, Energía La Mancha Enemansa, Energía Puertollano and Bioenergía Santamaría (the biomass generation facility)) | CCM 4.8 | 147,417,526 | 20% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | **20%** | - | - |
| Cogeneration of heat/cold and power from bioenergy in Navia and Pontevedra | CCM 4.20 | 36,678,286 | 5% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | **4%** | - | - |
| Production of heat/cold and power from bioenergy | CCM 4.24 | 2,317,113 | 0.3% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | **0.3%** | - | - |
| Forest management | CCM1.3 | 17,699,311 | 2% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | **2%** | - | - |
| **Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)** | | **204,112,236** | **27%** | **27%** | **0%** | **0%** | **0%** | **0%** | **0%** | Y | Y | Y | Y | Y | Y | Y | **26%** | | |
| Of which enabling (iii) | | 0 | 0% | 0% | 0% | 0% | 0% | 0% | 0% | Y | Y | Y | Y | Y | Y | Y | **0%** | E | |
| Of which transitional (iii) | | 0 | 0% | 0% | | | | | | Y | Y | Y | Y | Y | Y | Y | **0%** | | T |
| A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) | | | | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | | | | | | | | **0%** | | |
| Electricity generation from bioenergy: Puertollano | CCM 4.8 | 32,702,667 | 4% | EL | N/EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | **0%** | | |
| Valorisation of bio-waste by anaerobic digestion or composting - Bio-methane plants | CE 2.5 | 2,468,082 | 0.3% | N/EL | N/EL | N/EL | N/EL | EL | N/EL | | | | | | | | **0%** | | |
| **Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)** | | **35,170,749** | **5%** | **4%** | **0%** | **0%** | **0%** | **0.30%** | **0%** | | | | | | | | **0%** | | |
| **A. Turnover of Taxonomy-eligible activities (A.1 + A.2)** | | **239,282,985** | **32%** | **32%** | **0%** | **0%** | **0%** | **0.30%** | **0%** | | | | | | | | **26%** | | |
| B. TAXONOMY-NON-ELIGIBLE ACTIVITIES | | | | | | | | | | | | | | | | | | | |
| Turnover of Taxonomy-non eligible activities | | **507,969,493** | **68%** | | | | | | | | | | | | | | | | |
| Total (A + B) | | **747,252,477** | 100% | | | | | | | | | | | | | | | | |

## Turnover/total turnover ratio

| | Taxonomy-aligned per objective | Taxonomy-eligible per objective |
|---|---|---|
| Climate change mitigation (CCM) | 27.3% | 31.7% |
| Climate change adaptation (CCA) | 0% (ii) | 0% |
| Circular economy (CE) | 0% | 0.3% |
| Pollution prevention and control (PPC) | 0% | 0% |
| Water and marine resources (WTR) | 0% | 0% |
| Biodiversity and ecosystems (BIO) | 0% | 0% |

Notes:
(i)
Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective.
N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective.
N/EL – not eligible, Taxonomy-non-eligible activity for the relevant environmental objective. (ii)
(ii)
Activities CCM 4.8 (except for Puertollano), CCM 4.20, CCM 4.24 and CCM 1.3 meet the alignment criteria for both the mitigation and the adaptation objectives. However, to avoid double counting, the percentage calculation is allocated in its entirety to the mitigation objective as it is considered to be the one to which they contribute the most.
(iii)
The determination of enabling/transitional activities has been made considering the descriptions of the activities included in the Delegated Regulation (EU) 2021/2139, Delegated Regulation (EU) 2022/1214 and Delegated Regulation (EU) 2023/2486 in such a way that, only in the case that the description indicates that it is a facilitating or transitional activity, it has been considered as such.
(iv)
EL: the activity is eligible according to the taxonomy for the relevant objective.
N/EL: the activity is not eligible according to the taxonomy for the relevant objective.

The **percentage of eligible sales** has reached 32% of total Group sales by 2025. Compared to 2024 (26%), this figure increases, mainly due to higher energy sales at the biomass power generation plants as the Enemansa plant (not operating in 2024) and sales associated with the La Galera bio-methane plant (no sales in 2024 due to its acquisition in mid-December 2024) come back into operation in 2025. For the same reason, the percentage of **ineligible sales** declines from 74% in 2024 to 68% in 2025. In general terms, pulp sales, which account for the largest share of the Group's total sales, are reported as ineligible as the pulp production activity is considered ineligible.

For its part, the percentage of **sales aligned** with the taxonomy reached 27% of total Group sales in 2025. Compared to 2024 (26%) it increases slightly; however, although in overall terms it has increased, it has not reached 32% mainly because the Puertollano power plant (linked to CCM activity 4.8) is not aligned (see section *Action plan for non-aligned activities*). For the same reason, the percentage of **non-aligned sales** increases from 0% in 2024 to 5% in 2025. The largest contributions to the aligned sales figure come from the renewable biomass power generation activity at Magnon's plants (CCM 4.8).

The sales ratio for the activities covered by Delegated Regulation 2022/1214 is detailed below: In the case of Ence, these are only activities related to the production of energy from gaseous fossil fuels, specifically the co-generation of heat and electricity from natural gas at the Lucena plant (Cordoba). This activity is considered eligible, and in the case of Ence, it is considered aligned with the climate change adaptation objective (CCA 4.30) but not with the mitigation objective (CCM 4.30) because it does not meet all the technical selection criteria and DNSH criteria applicable to the activity Cogeneration of heat/cool and electricity from gaseous fuels, specifically those relating to CO2 emissions per kWh generated and those relating to methane leakage (see section *Action plan for non-aligned activities*).

| Activities related to gaseous fossil fuels | | |
|---|---|---|
| 4 | The company carries out, finances or is exposed to the construction or operation of electricity generation facilities that produce electricity from gaseous fossil fuels | NO |
| 5 | The company carries out, finances or is exposed to the construction, renovation and operation of combined heat/cold and power plants using gaseous fossil fuels | YES |
| 6 | The company carries out, finances or is exposed to the construction, renovation and operation of heat generation facilities producing heat/cold from gaseous fossil fuels | NO |

| Eligible economic activities according to taxonomy (denominator) | Amount and proportion | | | | | |
|---|---|---|---|---|---|---|
| | CCM+CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | Amount | % | Amount | % | Amount | % |
| Amount and proportion of the economic activity that complies with the taxonomy referred to in section 4.30 of Appendixes I and II of Delegated Regulation (EU) 2021/2139 in the denominator | 0 | 0% | 0 | 0% | 0 | 0% |
| Amount and share of other economic activities conforming to the taxonomy not mentioned in rows 1 to 6 in the denominator | 239,282,985 | 32% | | | | |
| **Total Sales** | **747,252,477** | **100%** | | | | |

| Economic activities aligned with the taxonomy (numerator) | Amount and proportion | | | | | |
|---|---|---|---|---|---|---|
| | CCM+CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | Amount | % | Amount | % | Amount | % |
| Amount and proportion of the economic activity that complies with the taxonomy referred to in section 4.30 of Appendixes I and II of the Delegated Regulation (EU) 2021/2139 in the numerator | 0 | 0 | 0 | 0% | 0 | 0% |
| Amount and share of other economic activities conforming to the taxonomy not mentioned in rows 1 to 6 in the numerator | 204,112,236 | 27% | | | | |
| **Total Sales** | **747,252,477** | **100%** | | | | |

| OpEx 2025 | | | | Substantial contribution criteria | | | | | | DNSH Criteria | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Economic Activities (1) | Codes (2) CCM; CCA; WTR; CE; PPC; BIO + Activity code | OpEx (3) € | Opex ratio for 2025 (3) % | Climate change mitigation (5) | Adaptation to climate Change (6) | Water (7) | Pollution (8) | Circular economy (9) | Biodiversity (10) | Climate change mitigation (11) | Adaptation to climate mitigation (12) | Water (13) | Pollution (14) | Circular economy (15) | Biodiversity (16) | Minimum safeguards (17) | Proportion of OpEx that conforms to the taxonomy (A.1) or Is eligible according to taxonomy (A.2), 2024 (18) | Category enabling activity (19) | Transition activity category (20) |
| A. TAXONOMY-ELIGIBLE ACTIVITIES | | | | | | | | | | | | | | | | | | | |
| A.1. Environmentally sustainable activities (Taxonomy-aligned) (v) | | | | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| Electricity generation from bioenergy | CCM 4.8 | 19,486,220 | 51% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 54% | - | - |
| Forest management | CCM1.3 | 268,394 | 0.7% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 0.20% | - | - |
| Production of heat/cold and power from bioenergy | CCM 4.24 | 8,054 | 0.02% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 0.01% | - | - |
| Cogeneration of heat/cold and power from gaseous fuels | CCA 4.30 | 44,929 | 0.1% | N | Y | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 1% | - | - |
| Cogeneration of heat/cold and power from bioenergy in Navia and Pontevedra | MCC 4.20 (v) | 3,423,436 | 9% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 11% | - | - |
| **OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)** | | **23,231,033** | **61%** | **61%** | **0%** | **0%** | **0%** | **0%** | **0%** | Y | Y | Y | Y | Y | Y | Y | **66%** | | |
| Of which enabling (iii) | | 0 | 0% | 0% | 0% | 0% | 0% | 0% | 0% | Y | Y | Y | Y | Y | Y | Y | 0% | E | |
| Of which transitional (iii) | | 0 | 0% | 0% | | | | | | Y | Y | Y | Y | Y | Y | Y | 0% | | T |
| A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) | | | | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | | | | | | | | % | | |
| Electricity generation from bioenergy: Puertollano | CCM 4.8 | 1,683,983 | 4% | EL | N/EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | | | |
| Valorisation of bio-waste by anaerobic digestion or composting - Bio-methane plants | CE2.5 | 425,680 | 1% | N/EL | N/EL | N/EL | N/EL | EL | N/EL | | | | | | | | 0.1% | | |
| **A.2. Taxonomy-eligible but not environmentally sustainable activities** | | 2,109,663 | 6% | 6% | | | | | | | | | | | | | 0.1% | | |
| **A. OpEx of Taxonomy-eligible activities (A.1 + A.2)** | | **25,340,696** | **67%** | **65%** | **0%** | **0%** | **0%** | **1.1%** | **0%** | | | | | | | | **67%** | | |
| B. TAXONOMY-NON-ELIGIBLE ACTIVITIES | | | | | | | | | | | | | | | | | | | |
| CapEx of Taxonomy-non eligible activities | | 12,656,281 | 33% | | | | | | | | | | | | | | | | |
| Total (A + B) | | 37,996,97 | 100% | | | | | | | | | | | | | | | | |

## OpEx/Total OpEx ratio

| | Taxonomy-aligned per objective | Taxonomy-eligible per objective |
|---|---|---|
| Climate change mitigation (CCM) | 61.0% | 65.5% |
| Climate change adaptation (CCA) | 0.1% (ii) | 0.1% |
| Circular economy (CE) | 0% | 1.1% |
| Pollution prevention and control (PPC) | 0% | 0% |
| Water and marine resources (WTR) | 0% | 0% |
| Biodiversity and ecosystems (BIO) | 0% | 0% |

Notes:
(i) Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective.
N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective.
N/EL – not eligible, Taxonomy-non-eligible activity for the relevant environmental objective.

(ii) Activities CCM 4.8, CCM 4.20, CCM 4.24 and CCM 1.3 meet the alignment criteria for both the mitigation and the adaptation objectives. However, to avoid double counting, the percentage calculation is allocated in its entirety to the mitigation objective as it is considered to be the one to which they contribute the most.

(iii) The determination of enabling/transitional activities has been made considering the descriptions of the activities included in the Delegated Regulation (EU) 2021/2139, Delegated Regulation (EU) 2022/1214 and Delegated Regulation (EU) 2023/2486 in such a way that, only in the case that the description indicates that it is a facilitating or transitional activity, it has been considered as such.

(iv) EL: the activity is eligible according to the taxonomy for the relevant objective.
N/EL: the activity is not eligible according to the taxonomy for the relevant objective.

(ii) From 2024, the OPEX relating to the activities of Ence (Pontevedra) and CEASA (Navia) has been split up, a distinction being made between the part corresponding to activity 4.20 (eligible) and the part corresponding to the pulp manufacturing activity (ineligible). For this purpose, the OPEX corresponding to the cogeneration activity unambiguously linked to electricity generation facilities (turbines, boilers, evaporators or biomass processing) was considered.

(iii) Bioenergía Santamaría (the natural gas cogeneration plant) is considered non-aligned with the mitigation objective as it does not meet all the technical selection criteria and DNSH criteria applicable to the activity Cogeneration of heat/cool and electricity from gaseous fuels, in particular those relating to CO2 emissions per kWh generated and those relating to methane leakage.

The percentage of **Eligible OpEx** has reached 67% of total Group sales in 2025, remaining at the same level as in 2024. The largest contributions to the OpEx figure come from the renewable biomass power generation activity at Magnon's plants (CCM 4.8). As for the **non-eligible OpEx,** it remains at the same levels as in 2024 (33%), corresponding mostly to the pulp production activity.

For its part, the percentage of **OpEx aligned** with the taxonomy reached 61% of total Group sales in 2025. Compared to 2024 (67%) it decreases, mainly because the Puertollano power plant (linked to CCM activity 4.8) is not aligned (see section *Action plan for non-aligned activities*). For the same reason, the percentage of **non-aligned OpEx** increases from 0% in 2024 to 6% in 2025.

The OpEx proportion for the activities covered by Delegated Regulation 2022/1214 is detailed below:

| Eligible economic activities according to taxonomy (denominator) | Amount and proportion | | | | | |
|---|---|---|---|---|---|---|
| | CCM+CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | Amount | % | Amount | % | Amount | % |
| Amount and proportion of the economic activity that complies with the taxonomy referred to in section 4.30 of Appendixes I and II of Delegated Regulation (EU) 2021/2139 in the denominator | 0 | 0% | 0 | 0% | 0 | 0.0% |
| Amount and share of other economic activities conforming to the taxonomy not mentioned in rows 1 to 6 in the denominator | 25,340,696 | 67% | | | | |
| **Total OpEx** | **37,996,977** | **100%** | | | | |
| **Economic activities aligned with the taxonomy (numerator)** | **Amount and proportion** | | | | | |
| | CCM+CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | Amount | % | Amount | % | Amount | % |
| Amount and proportion of the economic activity that complies with the taxonomy referred to in section 4.30 of Appendixes I and II of the Delegated Regulation (EU) 2021/2139 in the numerator | 44,929 | 0.1% | 0 | 0% | 44,929 | 0.1% |
| Amount and share of other economic activities conforming to the taxonomy not mentioned in rows 1 to 6 in the numerator | 23,186,104 | 61% | | | | |
| **Total OpEx** | **37,996,977** | **100%** | | | | |

| CapEx 2025 | | | | Substantial contribution criteria | | | | | | DNSH Criteria | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Economic Activities (1) | Codes (2) (CCM; CCA; WTR; CE; PPC; BIO + Activity code | CapEx (3) | 2025 CapEx ratio (3) | Climate change mitigation (5) | Climate change adaptation (6) | Water (7) | Pollution (8) | Circular economy (9) | Biodiversity (10) | Climate change mitigation (11) | Adaptation to climate change (12) | Water (13) | Pollution (14) | Circular economy (15) | Biodiversity (16) | Minimum safeguards (17) | Taxonomy-aligned (A.1) or Taxonomy-eligible (A.2) activity (18) | Category enabling activity (19) | Category transitional activity (20) |
| A. TAXONOMY-ELIGIBLE ACTIVITIES | | | | | | | | | | | | | | | | | | | |
| A.1. Environmentally sustainable activities (Taxonomy-aligned) (v) | | | | Y; N; N/EL(i)(ii) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y; N; N/EL(i) | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N | % | E | T |
| Forest management | CCM1.3 | 13,382,767 | 10% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 17% | - | - |
| Electricity generation using solar photovoltaic technology | CCM 4.1 | 141,933 | 0.1% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 0.2% | - | - |
| Electricity generation from bioenergy (except PU) | CCM 4.8 | 13,254,555 | 10% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 11% | - | - |
| Manufacture of biogas and biofuels for use in transport and of bioliquids | CCM 4.13 | 972,515 | 1% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 1% | - | - |
| Cogeneration of heat/cold and power from bioenergy in Navia and Pontevedra | CCM 4.20 | 16,654,178 | 12% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 3% | - | - |
| Production of heat/cold and power from bioenergy | CCM 4.24 | 7,215,264 | 5% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 3% | - | - |
| Construction, extension and operation of water collection, treatment and supply systems | CCM 5.1 | 4,341,740 | 3% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 1% | - | - |
| Installation, maintenance and repair of renewable energy technologies (PV self-consumption) | CCM 7.6 | 30,201 | 0.02% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 0.4% | E | - |
| Construction, extension and operation of waste water collection and treatment in Pontevedra | CCM 5.3 | 315,052 | 0.2% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 2% | - | - |
| Material recovery from non-hazardous waste: As Pontes Project | CCM 5.9 | 3,446,538 | 3% | Y | N/EL(ii) | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 2% | - | - |
| Cogeneration of heat/cold and power from gaseous fuels | CCA 4.30: | 232,152 | 0.2% | N/EL | Y | N/EL | N/EL | N/EL | N/EL | Y | Y | Y | Y | Y | Y | Y | 0.1% | | |
| Recirculation of reclaimed water Pontevedra | CE2.2 | 1,113,914 | 0.8% | N/EL | N/EL | N/EL | N/EL | Y(vii) | N/EL | Y | Y | Y | Y | Y | Y | Y | 0.2% | - | - |
| **CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)** | | **61,100,811** | **45%** | 44% | 0.2% | 0% | 0% | 0.80% | 0% | Y | Y | Y | Y | Y | Y | Y | **41%** | | |
| Of which enabling (iii) | | 30,201 | 0% | 0% | 0% | 0% | 0% | 0% | 0% | Y | Y | Y | Y | Y | Y | Y | | E | |
| Of which transitional (iii) | | 0 | 0% | 0% | | | | | | Y | Y | Y | Y | Y | Y | Y | | | T |
| A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) | | | | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | EL; N/EL(iv) | | | | | | | | % | | |
| Conservation, including restoration, of habitats, ecosystems and species | BIO 1.1 | 191,606 | 0.10% | N/EL | N/EL | N/EL | N/EL | N/EL | EL | | | | | | | | 0.1% | | |
| Biogas plants | CE2.5 | 5,449,578 | 4% | N/EL | N/EL | N/EL | N/EL | EL | N/EL | | | | | | | | 26% | | |
| Electricity generation from bioenergy - Biollano | CCM 4.8 | 976,719 | 1% | EL | N/EL | N/EL | N/EL | N/EL | N/EL | | | | | | | | - | | |
| **CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)** | | **6,617,902** | **5%** | 1% | 0% | 0% | 0% | 4% | 0.1% | | | | | | | | **26%** | | |
| **A. CapEx of Taxonomy-eligible activities (A.1 + A.2)** | | **67,718,713** | **50%** | 45% | 0.2% | 0% | 0% | 5% | 0.1% | | | | | | | | **67%** | | |
| B. TAXONOMY-NON-ELIGIBLE ACTIVITIES | | | | | | | | | | | | | | | | | | | |
| **CapEx of Taxonomy-non eligible activities** | | **67,146,281** | **50%** | | | | | | | | | | | | | | | | |
| Total (A + B) | | 134,864,994 | 100% | | | | | | | | | | | | | | | | |

## CapEx/Total CapEx ratio

| | Taxonomy-aligned per objective | Taxonomy-eligible per objective |
|---|---|---|
| Climate change mitigation (CCM) | 44% | 45% |
| Climate change adaptation (CCA) | 0.2% (ii) | 0.2% |
| Circular economy (CE) | 0.8% | 5% |
| Pollution prevention and control (PPC) | 0% | 0% |
| Water and marine resources (WTR) | 0% | 0% |
| Biodiversity and ecosystems (BIO) | 0% | 0% |

Notes:
(i) Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective.
N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective.
N/EL – not eligible, Taxonomy-non-eligible activity for the relevant environmental objective.

(ii) Activities CCM1.3, CCM4.8, CCM4.20, CCM4.1, CCM4.13, CCM4.24, CCM5.1, CCM5.3, CCM5.9, and CCM7.6 meet the alignment criteria for both the mitigation and adaptation objectives. However, to avoid double counting, the percentage calculation is allocated in its entirety to the mitigation objective as it is considered to be the one to which they contribute the most.

(iii) The determination of enabling/transitional activities has been made considering the descriptions of the activities included in the Delegated Regulation (EU) 2021/2139, Delegated Regulation (EU) 2022/1214 and Delegated Regulation (EU) 2023/2486 in such a way that, only in the case that the description indicates that it is a facilitating or transitional activity, it has been considered as such.

(iv) EL: the activity is eligible according to the taxonomy for the relevant objective.
N/EL: the activity is not eligible according to the taxonomy for the relevant objective.

(V) In the case of Lucena, where the investment is not specific to biomass electricity production, it has been classified under activity CCM4.30, following a conservative criterion (non-aligned activity).

The **percentage of eligible CapEx** has reached 50% of total Group CapEx by 2025. Compared to 2024 (67%), this figure decreases, mainly due to increased investment in the pulp business (non-eligible activity) related to the decarbonisation projects of the lime kilns at the Navia Bio-factory, which have involved more than €16 million for the replacement of fossil fuels with pulverised biomass (renewable energy), including work on the wood yard. For the same reason, the percentage of **ineligible CapEX** has increased from 33% in 2024 to 50% in 2025.

For its part, the percentage of **CapEx aligned** with the taxonomy reached 45% of total Group CapEx in 2025. Compared to 2024 (41%), this figure increases slightly due to the decrease in total CapEX for CE2.5 activity (-81%) compared to last year, mainly because in 2024, the acquisition of two companies (BioCH4 Developments SL and Biometagas La Galera SL) was incorporated as a change in the scope of consolidation; both related to the purchase at the end of 2024 of the La Galera bio-methane plant (CE2.5 activity considered non-aligned). For the same reason, the percentage of **non-aligned CapEx** increases from 26% in 2024 to 5% in 2025. The largest contributions to the aligned CapEx figure come from investments in forestry management (activity CCM1.3) and the renewable biomass power generation facilities at Magnon's plants (activity CCM4.8).

### Action plan for non-aligned activities

The Ence Group's main activity not eligible under the taxonomy criteria is pulp production, although the TEG (Technical Expert Group) in its report published in 2020 already recognised that the manufacturing industries section of the taxonomy should be extended to cover other activities in the short term, such as pulp and paper manufacturing. Ence believes that this activity should be considered eligible due to its substantial contribution to the circular economy objective and is working hand in hand with Spanish and European sectoral associations to promote its inclusion in the taxonomy framework.

The company's activities that, while eligible, are not aligned with the taxonomy are:

- The high-efficiency cogeneration of heat/cool and electricity from gaseous fossil fuels at the Bioenergía Santa María plant (Lucena), although aligned with the climate change adaptation objective (CCA4.30), does not meet all the criteria for the climate change mitigation objective (CCM4.30). In this case, the activity does not comply mainly because of the criteria $CO_2$ emissions/kWh generated and methane leakage. Given the useful life of the plant and the residual nature of the activity, Ence does not currently have an action plan to achieve the alignment of this facility.

- Bio-methane production. In this case, the taxonomy currently recognises three biogas-related activities (CCM4.13 Production of biogas and biofuels for transport and production of bioliquids; CCM5.7 Anaerobic digestion of biowaste and CE2.5 Valorisation of biowaste by anaerobic digestion or composting). However, the cross restrictions imposed by each of them (e.g. use of biogas for transport or the use of only bio-waste as defined in Directive 2008/98 or a co-digestion limit of other feedstocks of 30%) mean that plants based on the digestion of agro-livestock waste (manure, slurry, etc.) do not fit into any of the three activities if the gas produced is injected into the grid. Ence works hand in hand with Spanish and European associations in the biogas sector to promote the revision of these criteria and make them consistent with European expansion plans for this sector such as Repower EU.

- Protection of ecosystems in Ence’s forests dedicate to conservation (BIO1.1). In this case, this activity is not considered aligned because there is just one technical selection criterion related to the characterisation of the main species (species list, population size, etc.) that it does not meet throughout the Conservation Area Network. In this regard, Ence does currently have studies of the potential distribution of fauna covering all its forests and specific studies of the current status of species will be carried out progressively for all the conservation areas, which will enable the process of implementing the planned conservation actions to be strengthened and improved while complying with the taxonomy alignment requirements.

- Generation of electricity from bio-energy (CCM 4.8) for the Puertollano facility. In this case, this activity is not considered to be aligned in Puertollano because it does not meet one of the criteria of "DNSH 5 on Pollution Prevention and Control". Specifically with regard to the emission values set for the CO parameter. Annual average CO emissions are above the emission level ranges associated with best available techniques. The exceeding of the CO parameter values in 2025 is associated with incidents in the boiler combustion air management equipment and the change of start-up and shut-down schedules ordered by the electricity system operator. In order to control the CO value during 2025, Ence has carried out specific interventions and repairs, especially during plant shutdowns (increasing the capacity of the induced draught fan, increasing the availability of the boiler blowers, focusing on the operating logic) which have resulted in a systematic improvement in the daily CO emission values and thus a slow but ongoing decrease in the projected annual emission value of mandatory compliance. In addition to these improvements, Ence plans to implement a model based on dynamic learning APC (Advanced Process Control) that will reduce operational variability by 40% and thus contain and improve emissions by improving combustion in transient processes (secondary and start-ups). It should be noted that, with the measures implemented during 2025, the annual average, considering the values since the beginning of August 2025, is below the limit value. These actions are expected to bring this activity back into line by 2026.

# 2.2 Climate change (E1)

Climate change is one of the main global challenges and a strategic opportunity for Ence. The company actively contributes to mitigation through the generation of renewable energy (electricity, heat and bio-methane) and the production of bio-products that replace fossil materials, driving decarbonisation and the circular economy. For further details on the Strategic Framework, see section *2.2.4 Strategy*.

Beyond its business model, Ence's climate action is structured around two axes: adaptation, which is developed through a systematic analysis of climate risks and opportunities to integrate them into decision-making processes; and mitigation, which is materialised in the reduction of emissions in its operations through the Decarbonisation Plan; and in its active contribution to the decarbonisation of the energy mix.

## 2.2.1 Governance

Climate issues are managed and supervised by the Group's highest governing bodies.

The **Board of Directors** approves the Strategic Framework and Sustainability Master Plan, which includes targets for decarbonisation and growth in renewable businesses.

The **Audit Committee** monitors risks, including climate risks, in coordination with the Risk Management System (RMS) (more details in *1.4.6.6 ESG risk identification, assessment and management process*).

The **Sustainability Commission** defines and updates the Sustainability strategy aligned with corporate objectives, oversees the Sustainability Master Plan and monitors key indicators such as climate change. It reports on climate risks to the Board prior to review and approval, and meets quarterly to discuss and monitor the Decarbonisation Plan and relevant metrics.

The **Management Committee** reviews decarbonisation targets and projects on a monthly basis.

The **Climate Risk Committee**, chaired by the Chairperson of Ence, reviews the climate risk analysis annually. It is composed of the General Managers of the pulp, energy and finance areas, as well as the heads of corporate sustainability, planning and control and internal audit. It is responsible for identifying and assessing climate risks and assigning risk owners, quantifying the gross financial impact and then the net financial impact after implementing mitigation measures.

The **Directorate-General for Corporate Sustainability** coordinates decarbonisation plans, integrates climate risks into the RMS and reports indicators to the Board and in the Sustainability Report.

As a sign of Ence's strategic commitment to climate action, the company has linked climate change targets to the Long-Term Incentive 2023-2027, which is part of the variable remuneration (see *1.4.1.1 Sustainability objectives linked to variable remuneration*).

## 2.2.2 Impacts, risks and opportunities

### Impacts

Although Ence uses mainly renewable energy, its operations still generate greenhouse gas emissions both directly in its operations and indirectly along its value chain. It therefore calculates its Carbon Footprint annually and defines reduction actions in its Decarbonisation Plan (*see 2.2.5.2 Carbon Footprint 2025* **and** *2.2.4.2 Decarbonisation Plan: emission reduction targets, actions and resources*).

### Risks

Ence updates its climate risk analysis annually. This analysis is **integrated in the corporate RMS** and considers different physical and transitional scenarios over several time horizons, considering both operations of the company[9] and the value chain.

The analysis of risks and opportunities arising from climate change constitutes the company's resilience exercise aimed at identifying specific risks that may affect Ence, assessing the level of organisational preparedness to address them, and defining strategies to maximise the opportunities identified, ensuring the business model's ability to adapt to a changing environment. The methodology for identifying and assessing climate risks and impacts is described below.

### Climate risk identification

Ence has carried out a preliminary analysis of different reference frameworks that include classifications and typologies of climate risks, including those proposed by TCFD, CSRD, the European taxonomy and the draft Royal Decree on climate risk reporting currently being developed within the framework of the 2021 Climate Change Act. A comparative review of the risks reported by other companies in the industry has also been carried out.

9. The climate risk analysis included all Ence's direct operations and those of the value chain. No exclusion was identified. The ordinary income from the pulp business line, which has the greatest climate impact, may be found in note 9 "Ordinary income" of the Consolidated Annual Accounts for 2025.

| UNIVERSE OF IDENTIFIED CLIMATE RISKS | | | | | Probability | Pulp | Energy |
|---|---|---|---|---|---|---|---|
| Physical | Chronic | Changes in precipitation and temperature patterns | R1 | Decreasing wood availability and variability of plantations in Ence's forests. | Moderate | ✓ | |
| | | | R2 | Impact on Ence's assets due to reduced growth of *E. Globulus* in the south of the Iberian Peninsula | Likely | ✓ | |
| | | | R3 | Decrease in biomass availability. | Rare | | ✓ |
| | | | R4 | Reduced equipment performance due to temperature increase. | Rare | ✓ | ✓ |
| | Acute | Increased salinity | R5 | Increased salinity in Navia. | True | ✓ | |
| | | Heat Waves | R6 | Reduced staff performance due to extreme heat episodes. | Unlikely | ✓ | ✓ |
| | | Floods | R7 | Risk to structural integrity of bio-factories due to flooding. | Likely | ✓ | |
| | | Droughts | R8 | Reduced availability of water resources. | True (Pulp)<br>Moderate (Energy) | ✓ | ✓ |
| | | Forest fires | R9 | Increase in fires in Ence's forestry assets | Likely | ✓ | |
| Transition | Current regulations | Competition for water resources | R10 | Increased competition for water resources in bio-factories and power plants. | Moderate/rare (Pulp)<br>Probable (Energy) | ✓ | ✓ |
| | | Carbon price | R11 | Increase in the price of emission rights: Direct risk due to the cost of rights (R11.1) and indirect risk of an increase in the price of olive oil solid waste due to an increase in the price of carbon (R11.2). | True (R11.1)<br>Likely (R11.2) | ✓ | ✓ |
| | Market | Increased cost of raw materials | R12 | Increased costs for gas, chemicals and diesel/petrol linked to the price of CO2. | Unlikely | ✓ | ✓ |
| | | Reduced ability to attract investment/financing | R13 | Increased cost of funding due to lack of alignment with sustainability requirements of current funders. | Moderate | ✓ | ✓ |
| | | Need for transition to low-emission technologies | R14 | Increase in biomass price due to competition for biomass supply with biofuel producers, etc. | Likely | ✓ | ✓ |
| | New Regulations | New regulatory requirements | R15 | Inclusion of the maritime logistics industry in emissions trading with impact on transport costs | True | ✓ | |
| | | | R16 | Regulatory requirements involving restrictions on the use of biomass in bio-factories (R16.1) and power plants (R16.2) | Discarded (R16.1)<br>True (R16.2) | ✓ | ✓ |
| | | | R17 | Increased operational costs due to higher water prices in bio-factories (R17.1) and power plants (R17.2). | Likely | ✓ | ✓ |

The identification of climate risks takes into account new business lines that could be exposed to climate risk factors.

## Assessment of climate risks

### 01 Analysis of impact on operational variables

Managers have been assigned to the different business areas to assess the impact on operational variables of the risks identified in each area.

### 02 Translation of operational impact into financial impact

Once the impact on operational variables has been analysed, the financial impact of risks has been calculated, obtaining the **gross risk** value. Specifically, the impact on consolidated profit and the impact on the balance sheet.

This analysis has been carried out on a financial statement model based on standardised 2024 results.

### 03 Risk assessment

Assessment is carried out in line with the corporate risk map methodology.

**Probability: 5x5 assessment**

- Rare (0%-20%)
- Unlikely (21-40%)
- Moderate (41%-60%)
- Likely (61%-80%)
- Almost certain (81%-100%)

**Magnitude of the financial impact: 5x5 assessment**

- Negligible (<€300k)
- Minor (€300k-€1.5M)
- Moderate (>€1.5M-€3M)
- Major (>€3M-€6M)
- Severe (>€6M)

### 04 Critical risk identification and financial quantification

- Any risks with a financial impact on consolidated profit or on the balance sheet of > €6M are considered severe, in line with the corporate risk map.
- The risk assessment is based on **gross risk** and the final assessment is based on net risk. In other words, for risk assessment it is assumed that all planned mitigation measures have been implemented (both those for which investment is already committed and other measures planned for the short, medium and long term).
- The book value and income of assets at critical net risk are calculated, as well as the percentage they represent in relation to the total book value and total income, respectively.

Different scenarios and time frames have been used for the risk assessment, depending on whether the risks are physical or transitional. The climate risk analysis is in line with the information included in the company's Annual Accounts in the Note **"Climate Change and the Paris Agreement"**.

### Physical risks

For the assessment of the physical risks, two of the **scenarios envisaged in the IPCC's Sixth Assessment Report** have been used:

- Intermediate scenario: scenario **SSP245** has been selected; update of the previous RCP4.5.
- Pessimistic scenario: the **SSP585** scenario was selected; update of the previous RCP8.5.

The IPCC Sixth Assessment Report provides data for 1km x 1km grids.

These scenarios are applied to **three time horizons**: the near future (up to 2040), the medium-term future (up to 2070) and the distant future (up to 2100). When defining the time horizons of the physical risks, official climate projections have been taken into account, such as those of the AdapteCCa climate change scenario viewer developed by the Ministry for Ecological Transition and Demographic Challenge, the Spanish Office for Climate Change (OECC), the State Meteorological Agency (AEMET), the Spanish National Research Centre (CSIC) and the Biodiversity Foundation. In addition, for those installations potentially exposed to physical risks (such as flood risks) their useful lives are taken into account in the defining the time horizons.

The physical risks identified by Ence are classified into two categories: **chronic and acute risks.**

### Transition risks

For transition risks, projections and scenarios developed by the areas responsible for the valuation and by analysts with expertise in the sector for each of the operational variables analysed, such as:

- Network for Greening the Financial System (NGFS) in the NetZero 2050 scenario (scenario aligned with 1.5 ºC increase);
- International Energy Agency in the NetZero 2050 scenario for Advanced Economies;
- Reports from *Bloomberg; Morgan Stanley, Goldman Sachst* and *AFRY*, among others.

These scenarios apply to **three time horizons**: short term (one year), medium term (up to 2030) and long term (up to 2031-2050). In defining these time horizons, account was taken of the time horizon of the Decarbonisation Plan, which sets the first reduction targets for 2030, and also of the Climate Change Policy, which includes a commitment to achieve carbon neutrality by 2050.

The transition risks that Ence has identified fall into three categories: **current regulatory risks, market risks and future regulatory risks**.

### Results of climate risk analysis

As a result of the assessment, the risks have been grouped into three categories:

1. Critical risks: the value of the net risk is > €6M. Of the entire universe of risks analysed, after the implementation of the mitigation measures, none of the risks are critical; there is no need to provide information on the book value and net income from assets at critical risk.
2. Non-critical risks: this category includes two types of risks:
    a. Risks for which insignificant values (<€300k) for the gross risk were obtained during the analysis; such as R1, R11.2, R12 and R16.1; and
    b. Risks whose net risk value is below the criticality threshold (>€6M); such as R2, R5, R7, R8, R9, R10, R11.1, R13, R14, R15, R16.2, R17
3. Excluded risks: risks analysed over several years and for which the possibility of an impact of climate change on operational variables has repeatedly been ruled out. These are risks R3, R4 and R6.

The risks analysed are detailed below:

### Critical risks

Of the 17 potential risks identified, no risk has exceeded the criticality threshold (>€6M) for the net risk value, i.e. after all mitigation measures have been implemented.

In contrast to 2024, risk R11.1 related to the increase in $CO_2$ and its impact on facilities subject to the Emissions Trading Scheme (Navia, Pontevedra and Lucena) is no longer critical. In 2024, this risk was identified as critical due to the upward forecast of the allowance price and the free allocation reduction scenario. Moreover, in 2024, the volume of credits in "stock" available was very low and a larger number of credits had to be purchased; the situation was different in 2025. On the other hand, in 2025, the OECC (Spanish Climate Change Office) has made an upward adjustment to the volume of free allocation granted to Pontevedra, increasing it by 42% with respect to the preliminary allocation. This new situation, together with the actions of the Decarbonisation Plan, decreases the net risk to Moderate (€1.5M - €3M).

**Non-critical risks**

Two types of risks are distinguished in this category:

a. Risks where the gross risk value is negligible (< €300k) and therefore no mitigation planning is considered necessary.

| | | | ID | Risk | Description of the risk | Risk assessment | Pulp | Energy |
|---|---|---|---|---|---|---|---|---|
| Physical | Chronic | Changes in precipitation and temperature patterns | R1 | Decreasing wood availability and variability of plantations in Ence's forests. | Changes in the distribution of temperature and rainfall, especially in the medium and long term, may affect the growth of eucalyptus plantations (*E. globulus and E. nitens*) and their vulnerability to pests and diseases, which may lead to variations in the availability of wood in the Ence estate and supply areas. | The projected growth variations in the different IPCC scenarios in the north (growth of *E. globulus* and decline of *E. nitens*), together with the projected area variation of each species (reduction in *E. globulus* and increase in *E. nitens*) due to non-climatic factors offset the risk, resulting in a negligible risk. | ✓ | |
| Transition | Regulation | Carbon price | R11.2 | Increase in the price of emission allowances | Indirectly, the increase in the price of emission allowances may affect renewable fuels such as orujillo (olive oil solid waste), as it will increase the incentive for companies affected by the emissions trading scheme to replace fossil fuels with these materials with an emission factor of 0 (e.g. cement plants). This increased demand could lead to higher prices for olive oil solid waste and less availability for consumption in power plants. | An internal analysis has been carried out which shows a clear recovery in the volume of available solid waste as a result of a favourable olive harvest in 2025/2026. This recovery is also accompanied by a reduction in the consumption of solid waste by cement factories, which is expected to lead to a regularisation of the price. The plants with exposure to this risk are those that are more dependent on solid olive oil waste and have, in most cases, contracts that stipulate a fixed price over time, reducing their exposure to the risk. | | ✓ |
| | Market | Increased cost of raw materials | R12 | Increased costs for gas, fuel oil, chemicals and diesel/petrol linked to emissions trading. | The regulatory framework developed in the EU to promote decarbonisation may make fossil fuels more expensive (e.g. due to new green taxes affecting them) and may make energy-intensive raw materials more expensive too (as their cost depends to a large extent on the cost of the fuel or electricity needed for their production) and may affect the costs of raw materials used in installations. | The scenarios analysed foresee a reduction in the price of natural gas and Brent, which, together with the reduction in consumption resulting from the Decarbonisation Plan, significantly reduces exposure to cost variations in associated raw materials (such as peroxide and fuel oil). In the case of electricity, NGFS projects increases, while OMIP and AFRY anticipate stable prices similar to 2024. Overall, none of the scenarios involve a higher cost than in 2024, so the risk is considered negligible. | ✓ | ✓ |
| | New Regulations | New regulatory requirements | R16.1 | Regulatory requirements that place restrictions on the use of biomass (bio-factories). | New regulatory requirements related to biomass (especially of forest origin) set by standards such as the Renewable Energy Directive (RED III) may limit the availability of these resources for use in electricity generation in power plants and bio-factories. | In the case of bio-factories, the restriction on the use of certain forest biomasses affected by the directive for energy generation does not affect Navia and Pontevedra, where they are not currently consumed. For power plants, this risk is not ruled out and is analysed independently (R16.2). | ✓ | |

b. Risks whose net risk value is below the criticality threshold (<€6M).

| | | | ID | Risk | Description of the risk | Gross risk rating | Mitigation measures | Probability | Net risk rating | Pulp | Energy |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Chronic | Changes in precipitation and temperature patterns | R2 | Impact on Ence's assets due to reduced growth of *E. globulus* in the south of the Iberian Peninsula | IPCC models predict changes in precipitation and temperature that could affect the growth of *Eucalyptus globulus* and, therefore, the productivity of plantations in Ence's southern estate. | Critical in the short, medium and long term (>€6M) | Ence develops new genetic materials using hybrid eucalyptus species and selects varieties of the *Corymbia* genus that are better adapted to climatic stress. The programmes foresee commercial deployment in 2029-2030, allowing for the progressive replacement of *E. globulus* and ensuring the resilience of plantations by reducing risk. In this respect, a new clone that is better adapted to climatic conditions is expected to enter the commercial phase in 2025. | Likely | Insignificant (<€300k) | ✓ | |

| | | | ID | Risk | Description of the risk | Gross risk classification | Mitigation measures | Probability | Net risk rating | Pulp | Energy |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Physical | Acute | Increased salinity | R5 | Increased salinity in Navia | Changes in the flow of the river Navia, combined with a rise in sea level or tidal phenomena accentuated by meteorological factors, can lead to an increase in salinity at the water intake point, limiting the availability and affecting the plant's production. | Severe (>€6M) | Reducing water consumption, increasing internal storage capacity and improving catchment systems. The planned measures will be implemented progressively until 2030. | True | Insignificant (<€300k) | ✓ | |
| | | Floods | R7 | Risk to structural integrity of bio-factories due to flooding. | Rising sea levels, together with increasingly frequent extreme weather events (torrential rains, storms, etc.), increase the risk of flooding in plants near the coastline, such as Navia and Pontevedra, which could affect their production. | It is ruled out for the short to medium term. Significant (€3M-€6M) in the long term. | Implementation of physical protection measures, such as protective walls or installation of flood gates. | Likely | Significant (€3M-€6M) in the long term. | ✓ | |
| | | Droughts | R8 | Reduced availability of water resources | Pulp mills: The reduction in the flow of the river Lérez due to extreme weather conditions (droughts, heat waves) can cause stoppages at the Pontevedra bio-factory, affecting its production. This risk has already materialised, in 2022. | Thanks to the mitigation measures already implemented, the level of gross risk is lower (€300k-€1.5M) for the short, medium and long term. | Ence has developed a pioneering project in Pontevedra to recirculate its own effluents and regenerate water from the municipal WWTP through reverse osmosis treatment, reducing dependence on the river Lérez during periods of drought. After the pilot started in 2022 and completed in 2023, progress is being made on the engineering and permitting for the final industrial project. In addition, a tertiary treatment plant was installed and in 2025 the strategy was reinforced with improvements to the catchment pipeline. | True | Insignificant (<€300k) | ✓ | |
| | | | | | Power plants: La Loma, Enemansa and Mérida could be affected by ecological flow levels in episodes of extreme drought when water access restrictions are activated, Mérida being the only one with potential impact in the medium to long term. | Moderate (€1.5M-€3M) for the medium to long term. | In the case of Mérida, a water recirculation system for the Effluent Treatment Plant and emergency rainwater ponds was installed in 2024, reducing consumption and guaranteeing operational continuity. | Moderate | Insignificant (<€300k) | | ✓ |
| | | Forest fires | R9 | Increase in fires in Ence's forestry assets. | IPCC climate models predict more favourable conditions for fires in the Iberian Peninsula, due to increased drought and heat waves, especially in the south. This represent a threat to Ence's forest assets and supply areas, reducing the availability of wood and straining the market. It is mainly a medium to long term risk. | Lower (€300k-€1.5M) for the SSP245 and SSP585 climate scenarios. | Increase the frequency of clearing on both the northern and southern estates and incorporate additional fire monitoring measures on the northern estate. | Moderate | Insignificant (<€300k) | ✓ | |

| | | | ID | Risk | Description of the risk | Gross risk classification | Mitigation measures | Probability | Net risk rating | Pulp | Energy |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Transition | Regulation | Competition for water resources | R10 | Increased competition for water resources in areas affected by water scarcity in both bio-factories and Power Plants with increased pressure for water resources from interest groups. | In scenarios of reduced water availability in the rivers that supply our bio-factories and potential competitiveness in the use of this resource, Ence would have to increase the use of reclaimed water with the consequent increase in costs. In the power plants, a risk of competition for water resources has been identified, especially in the Huelva plant. | Moderate €1.5M-€3M) in the medium/long term. | Ence maintains open and fluid communication with the various stakeholders and bodies with competence in water issues in order to identify any action required to respond to stakeholder needs. | Likely | Moderate (€1.5M-€3M). in the medium/long term. | ✓ | ✓ |
| | | Carbon price | R11.1 | Increase in the price of emission allowances | The progressive reduction of free allocations in the Emissions Trading Scheme may impact Ence, given that three facilities (Navia, Pontevedra and Lucena) are included in this system. There is uncertainty about the percentage reduction, so three risk scenarios have been analysed: high (0% free allocation), medium (25%) and low (50%) with respect to 2026-2030 levels. | Moderate (€300k-€1.5M) in the short to medium term.<br>Moderate (from €1.5M-€3M) to significant (from €3M-€6M) in the medium term; depending on the scenarios (high, medium, low).<br>Critical in the long term (<€6M) | Ence's Decarbonisation Plan foresees specific measures to reduce emissions in the main emission sources in Navia and Pontevedra, including the replacement of natural gas and fuel oil, respectively, with carbon-neutral fuels such as bio-methanol or biomass. These measures will reduce the level of emissions and reduce dependence on emission allowance allocations. | True | Moderate (€300k-€1.5M) in the short to medium term. Moderate (€1.5M-€3M) in the medium to long term (for all scenarios analysed). | ✓ | ✓ |
| | Market | Reduced ability to attract investment/ financing | R13 | Increased cost of funding due to lack of alignment with sustainability requirements of current funders | A possible downgrading of Ence's ESG rating, for example as a result of an insufficient level of ambition in its climate targets, may lead to an increase in the cost of financing due to the linking of financial instruments to sustainability KPIs or indices. | Significant (€3M-€6M) in the short, medium and long term. | To mitigate this risk, Ence has defined a Decarbonisation Plan that involves the incorporation of progressive emission reduction measures that enables us to keep in line with the requirements of lenders. In addition, Ence has a corporate sustainability team that responds to ESG indices and ratings and incorporates the priorities of investors and analysts into the company's sustainability master plans. Examples of this include the 'Excellent' rating awarded by the *Ethifinance* rating agency and the recognition as the Most Sustainable Company in the second edition of the Banco Sabadell Awards, both of which were obtained in 2025. Ence also belongs to the prestigious FTSE4 Good Index Series, designed to measure the performance of companies that demonstrate sound practices in ESG criteria, in which the company has participated since 2021. Ence has also received the ESG Rating assessment from MSCI (10), or from the main international ESG rating agencies. In the latest rating received in 2025, Ence is ranked at level "A". Lastly, it should be noted that in 2025, it achieved the sustainability objectives linked to its promissory note programme. | Moderate | Significant (€3M-€6M) in the short, medium and long term. | ✓ | ✓ |
| | | Transition to low-emission technologies by competitors | R14 | Increase in biomass price due to competition for biomass supply with biofuel producers, etc. | The entry into the biomass market of new competitors, such as companies dedicated to the production of biofuels or companies seeking renewable fuels to reduce their emissions, may lead to an increase in the price of biomass or tensions in certain areas of supply affecting Ence. | Power plants: Significant (€3-€6M) in the medium and long term.<br>Bio-factories: Minor (€300k-€1.5M) | Reinforcement of the supply network to increase biomass mobilisation capacity and the definition of a diversification strategy as to be able to use different types of biomass that are not subject to so much market stress. | Likely | Power plants: Moderate (€1.5-€3 million) in the long term.<br>Bio-factories: Insignificant | ✓ | ✓ |

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| | | | ID | Risk | Description of the risk | Gross risk classification | Mitigation measures | Probability | Net risk rating | Pulp | Energy |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Transition | New regulations | New regulatory requirements | R15 | Inclusion of the maritime logistics industry in emissions trading with impact on transport costs | The inclusion of the shipping sector in the EU Emissions Trading Scheme may lead to increased logistical costs as ships could pass on increased costs to counterparties. | Minor (€300k-€1.5M) | The deployment of emission reduction regulations in maritime transport, such as the EU's FuelEU Maritime Regulation, provides for the reduction of emissions (-6% in 2030), which will enable Ence to reduce its level of exposure to risk. | True | Minor (€300k -€1.5M) | ✓ | |
| | | | R16.2 | Regulatory requirements that place restrictions on the use of biomass (power plants). | New regulatory requirements, such as those of the Renewable Energy Directive (RED III), may limit the availability of forest biomass for power generation, particularly affecting stump-fired plants. | Minor (€300k - €1.5M) in the medium/long term | Offsetting the use of stumps with other alternative biomasses. | True | Insignificant (<€300K) | | ✓ |
| | New Regulations | New regulatory requirements | R17 | Increased operational costs due to water price increase | Reduced water availability predicted by climate models may lead to increased fees and costs associated with concessions for industrial use, impacting bio-factories and power plants. Materialisation in the long term. | There is great uncertainty in forecasting how much the water price would rise, so the impact could vary from minor (€300k-€1.5M) to significant (€3M-€6M). | Measures to reduce water consumption including in R5 and R8. | Likely | From minor (€300k-€1.5M) to significant (€3M-€6M) depending on the range of water price increase | ✓ | ✓ |

**Risks ruled out**

These are risks that have been analysed for several years and for which the possibility of an impact of climate change on operational variables has repeatedly been ruled out.

| | | | ID | Risk | Description of the risk | Risk assessment | Pulp | Energy |
|---|---|---|---|---|---|---|---|---|
| | Chronic | Changes in precipitation and temperature patterns | R3 | Decrease in biomass availability. | Changes in precipitation patterns and temperatures could have an impact on the reduction of crop yields, such as olives, which would result in a decrease in biomass availability in Ence's supply areas. | The reduction in olive biomass yields due to climate change, both for rainfed and irrigated crops, is not considered significant enough to affect the availability of biomass for Ence. | | ✓ |
| | | | R4 | Reduced equipment performance due to temperature increase | The increase in temperature means a decrease in the performance of the equipment, which could lead to losses in both pulp production and electricity production. | The reduction of equipment performance as a consequence of temperature increase would lead to negligible amounts of production losses and/or negligible cost for resizing of refrigeration equipment. | ✓ | ✓ |
| | Acute | Heat Waves | R6 | Lower staff performance due to episodes of extreme heat. | As a consequence of increased heat stress mainly in the summer months, it would be necessary to increase the time of rest breaks for workers in areas particularly exposed to heat. This would result in a decrease in supervision work and therefore an increase in the downtime of the broken equipment, increasing the hours of non-production. | The loss of production related to equipment downtime as a result of reduced staff performance in heat stress episodes is considered negligible (<1% of production). | ✓ | ✓ |

### Opportunities

Adaptation to climate change and the transition to a low-carbon economy represent more opportunities than risks for Ence. The main opportunities on which Ence is focusing its growth strategy are:

| Opportunities related to climate change |
|---|
| The **promotion of electrification from renewable sources** in order to achieve the targets set by the European Union is an opportunity for Ence. The Renewable Energy business, especially through its biomass electricity generation activity, promotes the development of emission-free energies and is the **largest generator of biomass-based electricity in Spain**. With this, Ence contributes to decarbonising the national electricity mix. The renewable energy produced by Ence in 2025 has avoided more than **582,000 tCO2e** (including self-consumed and sold electricity). |
| The challenge of **decarbonisation for sectors that cannot easily be electrified**, such as certain industrial activities, and the reinforcement of the circular economy model are also an opportunity for Ence. In this sense, the **bio-methane and bio-fertilisers business line** is positioned as a comprehensive solution for the recovery of agricultural and livestock waste. On the one hand, the transformation of this waste into renewable gas (bio-methane) for injection into the grid contributes to the decarbonisation of these industries. On the other hand, the digestate generated in the process undergoes a treatment allowing its subsequent sale as **bio-fertiliser**, generating added value in rural areas, promoting more sustainable agricultural practices and reducing dependence on fossil-based fertilisers. This initiative not only responds to the climate challenge, but also promotes the circular economy model in rural areas by solving the problem of managing this agricultural and livestock waste. |
| The **demand for low-emission renewable thermal energy** to decarbonise industrial processes is also a great opportunity, as Ence is in a privileged position due to its extensive experience in the management of biomass facilities. Magnon Servicios Energéticos contributes to the decarbonisation of industry through the **sale of renewable thermal energy**. Through this subsidiary, Ence offers comprehensive solutions for the decarbonisation of its customers, developing biomass installations to replace fossil fuel boilers and thus enabling customers to reduce emissions and the costs associated with emission rights. |
| In line with the strategy outlined by the EU, more and more companies are adopting **carbon neutrality commitments** that can only be achieved by offsetting those emissions that they have not been able to reduce. In this context, as Spain's leading private forest manager, Ence has an opportunity to develop carbon sinks and trade **offset credits**. |
| The use of bio-fuels from **biogenic CO2** is another business opportunity for Ence since both its bio-factories and its independent power plants generate large amounts of biogenic $CO_2$. In this regard, Ence is already in contact with several potential partners for the development of projects aimed at using this $CO_2$ in various applications. |
| Low or carbon neutral improved cellulose products contribute to the decarbonisation of customers' end products. Clear examples include ***Naturcell***, with reduced footprint bleached pulp, the carbon neutral ***Naturcell*** **Zero** version or the new project in As Pontes that will generate **bleached recycled pulp** using recovered paper and cardboard with a lower carbon footprint. |
| The pulp business has also identified opportunities to substitute plastic materials with **moulded pulp**. One line of research is the production of moulded fibre for packaging and trays that will replace plastic products based on fossil fuels. |
| Another opportunity arising from climate change is the **better adaptation of the eucalyptus species** ***E. Globulus*** to areas that are currently too cold, thereby increasing productivity and the availability of wood for bio-factories. |
| By **trading biomass**, Ence makes biomass available to its customers to supply the growing demand for renewable heat, bio-fuels and other uses. Given that Ence is one of the largest managers of agroforestry biomass in Spain, its knowledge and capillarity in the territory for acquiring biomass is a competitive advantage. |
| Production of **secondary raw materials** from by-products obtained in the pulp making process such as renewable bio-methanol (fossil fuel substitute) and sulphuric acid for use in the mills or potential commercialisation. |

More information on the integration of these opportunities, and their associated business lines, into Ence's growth strategy is included in section ***2.2.4 - Strategy and objectives***.

## 2.2.3 Climate Change Policy

Ence has a Climate Change Policy approved by the Board of Directors, which defines the framework for achieving carbon neutrality by 2050. The policy provides for the progressive reduction of the carbon footprint in line with the Paris Agreement (1.5 °C scenario) and the offsetting of residual emissions after reaching the maximum reduction level.

The Policy integrates climate change into strategic planning and decision-making, incorporates its risks into corporate management, promotes adaptation to strengthen resilience, drives mitigation through emissions reduction and energy efficiency with renewable sources, encourages the development of products and services that accelerate decarbonisation, and extends this commitment to the entire value chain to reduce indirect emissions.

These policy principles are defined in such a way as to cover the climate change-related impacts, risks and opportunities identified in section ***2.2.2 Impacts, risks and opportunities.***

The Climate Change Policy also establishes the obligation to define Decarbonisation Plans with concrete, measurable and reasonable targets, to continuously monitor performance and to publish regular information on the degree of progress. This **Policy** is available on the website's website.

## 2.2.4 Strategy and objectives

### 2.2.4.1 INTEGRATING CLIMATE ACTION INTO THE BUSINESS MODEL

The analysis of climate risks and opportunities is part of the resilience analysis[11] as it is the basis for establishing measures to mitigate or adapt to risks and improve resilience to the future effects of climate change.

This is why climate risk analysis is a fundamental part of the definition of Ence's strategy to ensure that the opportunities identified are used as a basis for new lines of business, and to ensure that risks are detected, analysed and the necessary control measures are defined. Thus, in the company's 2024-2028 strategic framework, these opportunities have been integrated as vectors for growth and diversification in both the pulp and renewable energy businesses:

**Pulp and forestry business**

- Development of low carbon pulp products (Naturcell, moulded pulp, recycled pulp) – See section ***1.3.1 Strategic Framework - Pulp Business***.

- Development of plant material adapted to climate change: Ence prioritises forest sustainability in the face of climate risks through R&D programmes aimed at resistant and adapted plant material. In 2025, a new commercial clone of *Eucalyptus globulus* was added, expanding the portfolio of clones and seeds improved for growth, adaptation and resistance. For *Eucalyptus nitens,* the production of improved seed in second generation orchards is maintained. In addition, programmes have been initiated with new species such as *Corymbia,* from regions with conditions similar to those expected for the Iberian Peninsula.

- Carbon sinks: The promotion of emission offset credits, through projects registered in voluntary schemes such as air$CO_2$ or the Spanish Climate Change Office (OECC), is another of Ence's business lines based on decarbonisation. These credits represent an opportunity for companies from different sectors to offset their emissions, thus contributing to sustainability and decarbonisation goals. At the end of 2025, Ence already had more than 4,300 hectares registered in these schemes.

**Renewables Business** (See section 1.3.2 Strategic Framework - Renewables Business)

- Biomass power generation
- Renewable thermal generation
- Bio-methane and bio-fertilisers
- Biogenic $CO_2$ for biofuel production

### 2.2.4.2 DECARBONISATION PLAN: EMISSION REDUCTION TARGETS, ACTIONS AND RESOURCES

Ence's commitment to the fight against climate change is reflected in an ambitious **Decarbonisation Plan**[12,13,14]. The reduction goals are summarised below:

**Scope 1 and 2 reduction targets**

- Objective 2030: - 55% in absolute emissions (scope 1 and 2) at group level compared with 2018.

- Objective 2035: - 75% in absolute emissions (scope 1 and 2) at group level compared with 2018.

**Scope 3[15] reduction targets**

- Objective 2030: - 10% in absolute emissions (scope 3) at group level compared with 2023.

- Objective 2035: - 15% in absolute emissions (scope 3) at group level compared with 2023.

The reduction targets included in the Decarbonisation Plan are in line with the targets agreed in the Paris Agreement, as well as the commitments made at EU and national level, and are aligned with the main requirements of the 1.5 ºC temperature increase scenario. In defining the decarbonisation pathway, Ence has incorporated the main recommendations of SBTi (Industry Near-term target). In addition to these long-term objectives, Ence is committed, through its Climate Change Policy, to achieving climate neutrality by 2050 through the use of mechanisms to offset residual emissions once the maximum reduction level has been reached. The Decarbonisation Plan is approved by the Board of Directors.

11. All facilities and business lines are considered in the climate risk analysis, resilience analysis and in the definition of the strategy and business model. Climate analysis involves areas of uncertainty especially linked to the prediction of mostly physical events (e.g. natural disasters that are difficult to predict); to the complexity of interdependencies (e.g. in complex systems, how a disruption in one area will affect others); to data limitations (e.g. incomplete or estimated data can hinder the ability to accurately assess); or to changing conditions (e.g. constant socio-economic changes can alter the risk landscape, making it difficult to keep the climate analysis up to date). To reduce uncertainty, Ence uses reference sources for the construction of climate scenarios and for assumptions such as the International Energy Agency (IEA), Bloomberg reports or IPCC climate scenarios (physical risks) or NGFS (transition risks). In addition, Ence updates the Risk Analysis annually, ensuring that all the variables analysed and the assumptions included are reviewed using the latest available updated data.
12. In drawing up the Decarbonisation Plan, the emissions projections of Ence's current activities have been taken into account, following an operational control approach. In the event that a new operation is initiated, Ence would review the Decarbonisation Plan, and if necessary, recalculate the target year and the reduction targets. However, Ence's growth strategy is based on low carbon-intensive activities that do not represent a risk to the achievement of the Decarbonisation Plan.
13. For the estimation of future GHG emissions that may occur as a result of Ence assets sold during their useful life (locked-in emissions); it has not been considered that assets will be sold before the end of their useful life. In other words, these emissions would occur anyway, regardless of whether or not an asset or product of the company had been sold.
14. Ence is not excluded from the EU Paris-aligned Benchmarks in accordance with Article 12 of **Delegated Regulation (EU) 2020/1818** on minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks. 5. Excluded from the scope of the target are categories 2 (capital goods), 10 (processing products sold); and Well-to-tank emissions from all transport in scope 3.

The concrete measures to achieve the objectives are detailed below.

### Scope 1 and Scope 2 emission reduction measures

| Reduction measure | Scope | | Description | Type of action |
|---|---|---|---|---|
| Replacement of natural gas consumption with bio-methanol | 1 | Cofiring technology using bio-methanol (MeOH) in lime kilns.<br>MeOH is a liquid biofuel from the black liquor evaporation plant.<br>Technology included in the BAT. | • Replacement of 10% of natural gas in Navia lime kiln This measure was already implemented in 2023.<br>• Replacement of 10% of fuel oil in Pontevedra lime kiln. | Fuel switching |
| Substitution of natural gas/fuel oil consumption by pulverised biomass | 1 | Cofiring technology of pulverised biomass in lime kilns. Raw material potential: Sawdust, bark, "microchips", lignin. | • Replacement of 80% of natural gas in Navia lime kiln In 2025, part of the natural gas consumption has already been replaced with sawdust.<br>• Replacement of 50% of fuel oil in Pontevedra lime kiln. | Fuel switching |
| Electricity consumption with GdO | 2 | Increased self-consumption of electricity from renewable electricity generated with Guarantees of Origin (GoO) with an emission factor of 0. | • In bio-factories, there are plans to increase renewable electricity self-consumption, moving from the current scheme of total sale to one of self-consumption with sale of surplus, in line with the purpose of turbine remuneration.<br>• At the Power Plants, redemption of Magnon GdOs is proposed, in order to reduce scope 2 emissions by 100%.<br>• In addition, it considers the increase of renewables in the national electricity mix according to the PNIEC 2023-2030, which sets targets of 67% in 2025 and 81% in 2030. | Use of renewable energy |

It is estimated that these measures will lead to reductions of 59% and 79% in scopes 1 and 2 emissions in 2030 and 2035 respectively, relative to 2018.

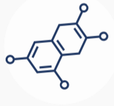
It should be noted that the emission reduction targets are included within the variable remuneration, in the Long Term Incentive (see section 1.4.1.1 Sustainability objectives linked to variable remuneration).

Ence is also committed, through its Climate Change Policy, to achieving neutrality by 2050. For this, the company will update the Decarbonisation Plan by incorporating additional reduction measures beyond 2035 that respond to the evolution of the growth model. Once the maximum level of reduction has been achieved with the available technology, prioritising nature-based solutions, Ence will offset the residual emissions. Ence will use voluntary offset credits from recognised standards such as the Gold Standard or Verra VCS (Verified Carbon Standard) to offset residual emissions.

## Scope 3 emission reduction measures

### EMISSION SOURCES

Main scope 3 **emission sources:**



**Consumption of raw materials**

Emissions related to the consumption of chemical products, mainly in the pulp business, such as soda, oxygen, oxygenated water, sulphuric acid, lime and sodium carbonate.

**Pulp transport**

Emissions related to the transport of pulp from our plants to the customer.

**Wood and biomass transport**

Emissions related to the transport of wood and biomass to our plants.

**Use of fossil fuels**

Indirect emissions related to the extraction and refining of fossil fuels.

## Action plan to reduce emissions

### REDUCTION MEASURES

Main scope 3 emission **reduction measures** identified:

**1. Emission reduction regulation in transport**

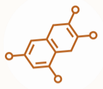
The regulatory context (FuelEU Maritime + RED II[1] and RED III[2]) calls for reduced transport emissions and will act as a lever to decarbonise:

**Wood and biomass transport**

**Pulp transport**

**2. Supplier GHG emission reduction plan**

The specific objectives for reduced emissions of our main raw material suppliers and shipping companies will enable us to decarbonise:



**Consumption of raw materials**

Reduced emission factor (tCO2e/tonne) of each raw material in line with the reduction plans and objectives regarding the main suppliers of the relevant raw material.

**Pulp transport**

Reduced emission factor (tCO2e/tonne*km) in line with the reduction plans and objectives of the main shipping companies and vessels with which Ence works.

**3. Reduced fossil fuel use**

The fossil fuel reduction measures included in A1 will be implemented in order to reduce the associated indirect emissions:

**Use of fossil fuels**

(1) FuelEU Maritime – Maritime transport: The aim of Regulation (EU) 2023/1805, known as "FuelEU Maritime", is to limit greenhouse gas (GHG) emissions from the energy used on board ships arriving, departing and staying in EU ports. The GHG reduction targets are articulated along the following pathway: -2% (2025); -6% (2030); -14,5% (2035); -31% (2040); -62% (2045); y -80% (2050).
(2) RED II and III - Road transport: The minimum share of renewable energy (in relation to final energy consumption) in the transport industry in 2030 should reach 14%; according to RED II. According to RED III, this % increases to 29% or a greenhouse gas reduction of 14.5% by 2030 (incorporation of biofuels).

**Earmarked resources**

Regarding the decarbonisation plan, the budgeted investment for the decarbonisation of the lime kilns in Navia amounts to €35 million in 2025-2026, with an expected return (ROCE) of more than 15%. This amount is net of a grant of €13 million from IDAE, the government's Institute for Energy Diversification and Saving, which will be collected at the end of the project.

In 2025, the total investment (CapEx) related to **Climate Change** has reached more than €32 million, increasing more than 3 times compared to the previous year.

- 52% has been allocated to the **decarbonisation of operations**, with a special focus on the actions contemplated in the Decarbonisation Plan at the Navia bio-factory with the conditioning of the wood yard and the work to enable the replacement of fossil fuels with pulverised biomass in the lime kilns.
- The **development of business opportunities** linked to climate change has concentrated the rest of the investments. 22% for the renewable thermal energy sales business line and 12% for the development of the bio-fertiliser and bio-methane activity. 6% for the development of the moulded pulp line for plastic substitute packaging. This category also includes investments for the development of projects related to the production of renewable bio-fuels, the promotion of new biomass and photovoltaic projects, the development of advanced fuels from by-products of the pulp manufacturing process and investments for the management of $CO_2$.

## 2.2.5 Metrics

### 2.2.5.1 ENERGY CONSUMPTION

**Energy consumption**

Ence generates renewable energy both at its bio-factories and at its independent power plants, with a firm commitment to improving energy efficiency in its production processes. The company aims to move towards self-consumption and progressively reduce its dependence on fossil fuels. In line with this objective, 91% of the energy consumed by Ence comes from renewable sources, with biomass being the predominant resource.

In **bio-factories,** energy consumption is mainly based on biomass derived from wood used in pulp production, such as bark and lignin, together with external biomass inputs. To a lesser extent, non-renewable fuels such as fuel oil or natural gas are also used in lime kilns or as auxiliary fuels in boilers.

At Ence's **power plants**, Ence uses agro-forestry biomass as the main fuel, occasionally supplemented with fuel oil or diesel during start-up and shut-down phases. In the specific case of the Lucena plant, natural gas is included in the cogeneration facility.

**Energy consumption and mix (m MWh) (1)(2)(3)**

| Consumption | 2023 | 2024 | 2025 |
|---|---|---|---|
| (1) Biomass (4) | 4,880.8 | 5,646.9 | 6,120.1 |
| (2) Bio-methanol | 67.8 | 58.8 | 42.3 |
| (3) Black liquor | 4,455.5 | 4,522.6 | 4,246.7 |
| (4) Solar photovoltaic | - | - | 0.6 |
| Renewable (mMWh) (1)+(2)+(3)+(4) | 9,404.1 | 10,228.3 | 10,409.6 |
| % renewable consumption | 91% | 92% | 91% |
| (5) Fuel oil and recovered oil | 369.1 | 312.1 | 341.0 |
| (6) Diesel (5) | 53.2 | 6.4 | 10.2 |
| (7) Natural gas / GNL | 378.2 | 451.3 | 436.2 |
| (8) Propane | 0.5 | 0.4 | 0.8 |
| (9) Electricity mix | 118.9 | 152.5 | 203.8 |
| Non-renewable (mMWh) (5)+(6)+(7)+(8)+(9) | 919.9 | 922.7 | 991.9 |
| % non-renewable consumption | 9% | 8% | 9% |
| **TOTAL (GWh)** | **10,324.0** | **11,151.0** | **11,401.6** |
| Self-consumption of electricity from renewable sources using biomass (mMWh)(2) | 567.4 | 604.3 | 560.6 |
| Self-consumption of electricity from non-renewable sources (mMWh)(2) | 1.1 | 1.2 | 1.3 |

(1) Includes the energy consumption (in thousands of MWh) of the pulp production bio-factories, the biomass electricity generation plants and the renewable heat generation business and the La Galera plant.
(2) Self-consumption of electricity is not included in energy consumption in order to avoid double counting with the consumption of biomass fuel (with which this own electricity is produced). Self-consumption of electricity from non-renewable sources refers to the natural gas cogeneration unit (LU13) at the Lucena plant and self-consumption of electricity from renewable sources refers to the Navia and Pontevedra bio-factories, biomass power plants, with the exception of LU13 at the Lucena plant.
(3) Ence does not consume fuels derived from coal and its by-products. For its part, Ence does not consume nuclear energy directly, only the proportional part corresponding to the generation of electricity from nuclear energy in the national electricity mix.
(4) It includes sawdust consumption. From 2025, the consumption of sawdust in the Navia lime kiln has started in order to reduce dependence on fossil fuels, in line with the Decarbonisation Plan.
(5) Sum of Diesel A+B+C.

Overall, in 2025, the Ence Group's total energy consumption increased by 2% compared to 2025, mainly due to increased energy activity, with electricity generation at power plants increasing by 10% compared to the previous year. The most significant variations compared with 2024 are:

- Increased biomass consumption (+8%) related to increased biomass electricity production in power plants (+10%).
- Increased fuel oil and recovered oil consumption (+9%) linked to higher fuel oil consumption due to the increase in the number of start-ups, mainly in Pontevedra and Huelva. In Pontevedra, the stoppages due to the workers and transport strike have meant an increase in stop-start cycles. In the case of Huelva, there have been isolated incidents that have led to a higher number of restarts. For its part, Navia has increased the use of recovered oil in favour of fuel oil in the lime kiln; this has made it possible to optimise costs while consuming a fossil fuel with a lower emission factor.
- Increase in electricity consumption from the grid (+34%) mainly due to the decrease in electricity generation in Navia, Pontevedra and Huelva resulting in less self-consumption of electricity. The decrease in generation is due to the temporary unavailability in the pulp business of one of the generation turbines, as well as the stoppage periods derived from the strikes in Pontevedra or incidents in Huelva with an increase in stoppages.

In addition, some power plants have photovoltaic installations to cover auxiliary service needs and to support biomass treatment plants. In addition to these existing facilities in Huelva, Mérida, and Biollano, the La Galera plant was added in 2025 to become energy self-sufficient. The commitment to energy efficiency enabled the bio-factories to renew their UNE-EN ISO 50001:2018 certification in 2025.

## Energy intensity

### Energy Intensity (MWh/€M)(1)

| Period | 2023 | 2024 | 2025 |
|---|---|---|---|
| Renewable energy intensity | 11,330.3 | 11,751.3 | 13,930.6 |
| Non-renewable energy intensity | 1,108.3 | 1,060.0 | 1,327.4 |

(1) Energy intensity = (MWh)/ (net income (€M)). The net income figure may be found in the Consolidated Annual Accounts under section "9. Ordinary income and other operating income".

The ratio of energy intensity to turnover is not a representative KPI for Ence's activity. From an operational point of view, energy consumption in the pulp business depends on the volume of pulp produced and, in the renewable electricity generation business, on the volume of energy produced.

### Energy Intensity

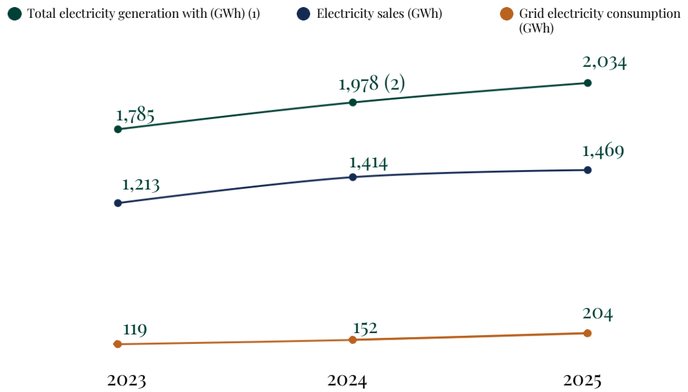
| Period | 2023 | 2024 | 2025 |
|---|---|---|---|
| Pulp business (MWh/tAD) (1) | 0.06 | 0.13 | 0.16 |
| Power Plant Business (GJ biomass/GWh) (2) | 17,914.3 | 17,195.9 | 16,918.9 |

(1) Grid electricity consumption/pulp production. The increase in 2025 was due to the temporary non-availability in the pulp business of one of the generation turbines in Navia, which led to an increase in grid electricity consumption.
(2) This includes electricity generation from biomass. 2023 and 2024 recalculated.

## Electricity generation and consumption

In bio-factories and independent power plants, Ence produces renewable electricity from biomass. This not only contributes to decarbonising the electricity mix, but also brings stability to the grid, as supply is manageable and not subject to weather factors such as solar radiation or wind speed.

### Electricity evolution (GWh)




(1) Excludes generation by photovoltaic panels. (2) Recalculated data to ensure comparability between years, generation by photovoltaic panels is not included.

In 2023, Ence changed the consumption regime of the bio-factories from the usual situation of the electricity market system whereby operators buy all they consume and sell all they generate to a self-consumption regime, with the surplus being fed into the grid. As a result, more than 73% of the electricity consumed is of renewable origin and comes from self-consumption. This measure significantly reduces Scope 2 emissions.

In power plants, although most of the electricity generated is fed into the grid, some is consumed internally. At specific times, such as during annual maintenance stoppages or in order to power auxiliary installations, plants have recourse to grid electricity.

## Heat generation for sale

Magnon Servicios Energéticos (MSE) promotes the development of renewable thermal generation. This enables its customers to replace fossil fuel boilers, such as natural gas, with renewable fuels, such as biomass.

The company already has one plant in operation and three under construction to be completed by 2026. In addition, in 2025, it was awarded an operation and maintenance contract for a plant that is already built, which is in the commissioning phase and will come on stream in 1T26 Ence is also negotiating 10 other projects, 2 of which are at an advanced stage. For its part, the cogeneration plant in Lucena also generates heat, which is used in a nearby facility to dry olive oil waste.

### Heat generation (GWh)

| Period | 2023 | 2024 | 2025 |
|---|---|---|---|
| Magnon Servicios Energéticos (MSE) | 9.8 | 35.4 | 34.3 |
| Lucena | 64.7 | 70.1 | 80.8 |

### Bio-methane generation

Ence has had a bio-methane generation plant, La Galera, since the end of 2024. By generating bio-methane and injecting it into the gas grid, natural gas emissions can be replaced by CO2-neutral bio-methane.

**Bio-methane generation (GWh)**

| Period | 2024 | 2025 |
|---|---|---|
| La Galera | - | 26.74 |

## 2.2.5.2 ENERGY SAVING CERTIFICATES

In 2025, Ence, together with a major company in the energy industry, was involved in the largest energy efficiency operation within the new system of Energy Saving Certificates (CAEs) promoted by the Spanish Ministry for Ecological Transition and the Demographic Challenge.

The project consisted of the implementation by Ence of an advanced technology project to increase the energy efficiency of its boilers as part of its strategic commitment to innovation in its production centres. This initiative will save 191 GWh of energy consumption per year, an amount equivalent to the demand of more than 55,000 households.

A CAE is an electronic document that certifies a specific annual energy saving resulting from an energy efficiency action. One CAE is equivalent to 1 kWh of energy savings, so this measure has resulted in 191 million certificates. The operation has been verified by Aenor. This is the largest volume of CAEs issued to date in Spain.

Ence has carried out this transaction in a hitherto unprecedented scenario which, for the first time, allows energy trading companies to use energy consumers to meet energy efficiency targets through the purchase of CAEs. With this collaboration, Ence reaffirms its participation and commitment to the energy transition towards a circular and decarbonised economy model.

## 2.2.5.3 CARBON FOOTPRINT 2025

The analysis of the company's carbon footprint is the main tool used by Ence to define its emissions reduction strategy, as it reveals the main opportunities for improvement and facilitates monitoring the evolution of emissions from year to year. In 2018, Ence implemented the calculation of the carbon footprint of the organisation and its main products (pulp and energy generated), which served as the base year for setting reduction targets.

This analysis is carried out in accordance with UNE EN ISO 14064-1:2019 (organisational footprint) and UNE EN ISO 14067:2019 (product footprint), in addition to following the recommendations of the Corporate Accounting and Reporting Standard of the GHG Protocol and using the ICFPA's specific Calculation Tools for Estimating Greenhouse Gas Emissions from Pulp and Paper Mills.

In 2025, for the sixth year running, Ence registered its 2024 carbon footprint in the voluntary registry of the Ministry for Ecological Transition and the Demographic Challenge, obtaining the "I calculate and reduce" seal.

Each year, the results of the analysis are subject to independent external verification with a reasonable level of assurance, the highest level.

Ence's carbon footprint is calculated using an operational control approach and covers direct emissions from operations (Scope 1), indirect emissions from the purchase of electricity (Scope 2) and other indirect emissions (Scope 3), taking into account the entire life cycle of its activities and products, from the procurement of raw materials to the distribution and transformation of the final product.

With regard to the definition of the organisational boundary, a facility is defined as each of the sites where the Ence Group carries out its activities related to the processes of wood cultivation, pulp and energy production from biomass, logistics and other areas necessary for the activity, such as offices, as well as activities related to the businesses of renewable thermal energy generation and biomass trading. In contrast to 2024, 2025 includes the bio-methane generation business, in particular the La Galera bio-methane plant acquired at the end of 2024.

In calculating emissions, those considered to have very little influence on the calculation and those on which information was not reliable or easily accessible were excluded, in accordance with UNE EN ISO 14064:2019. Exclusions include emissions from:

- Consumption of office supplies. The corporate business accounts for less than 1% of Ence's total emissions, so excluding office consumables is not considered to have a significant impact on the results.
- Travel by rental car for business trips because we do not have the data of the subcontracted company. The latest available figure was less than 400t$CO_2$ and is therefore considered non-significant.
- Transport of seedlings from southern nurseries, estimated at less than 10 t$CO_2$e.

Once externally verified, Ence publishes detailed reports with the results of the carbon footprint on its website.

ACCESS THE REPORTS
ENCE'S WEBSITE

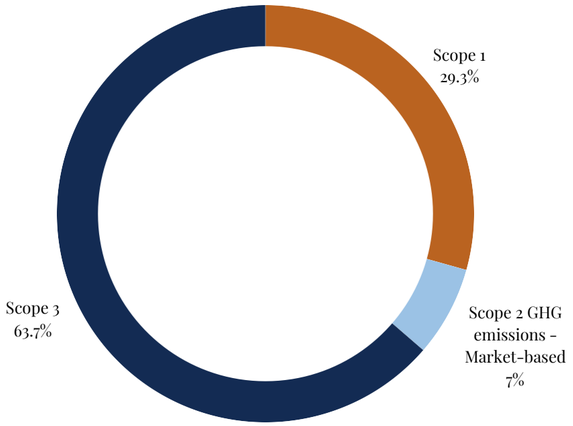
### Emissions by scope

The Group's emissions in 2025 amounted to **758,677.7 t$CO_2$e**[16]. Scope 3 indirect emissions are the largest contributor, accounting for 64% of the total. In this scope the main sources correspond to the purchase of raw materials (GHG Protocol Category 1), upstream and downstream transport (GHG Protocol Categories 4 and 9) and indirect emissions from the processing by customers of the pulp sold (GHG Protocol Category 10).

Direct emissions (Scope 1) account for 29% of the total, with emissions from the consumption of fossil fuels standing out within this scope, while emissions from electricity consumption (Scope 2) account for 7%.

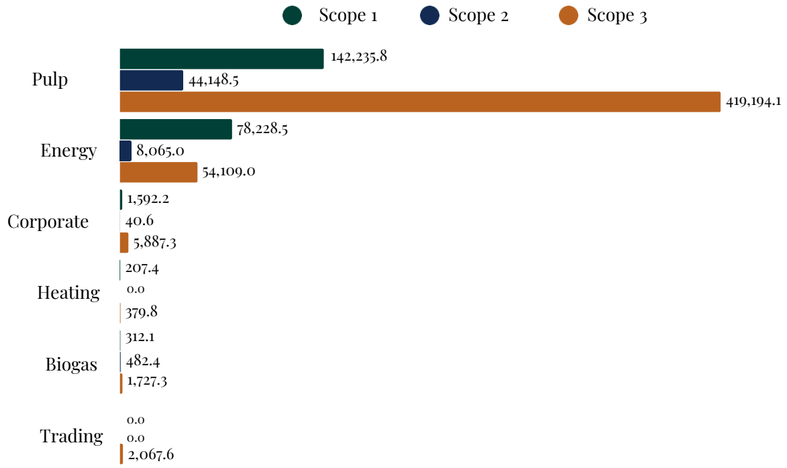
16. The results of the 2025 carbon footprint analysis are based on data available at the closing date of this report. The calculations have used the latest available emission factor values, in many cases for 2024, and should therefore be considered provisional and will need to be updated once the relevant agencies publish updates for 2025. Once the carbon footprint has been recalculated with the emission factors corresponding to 2025, Ence will have the GHG Report verified by an independent external body and publish it on its website.

## GHG emissions by scope (tCo2e) (market-based) [1]




Further information on the breakdown of the carbon footprint is included in *Appendix II - Environmental and social indicators - Carbon Footprint*.

## GHG emissions by business (tCo2e)




By business, the cellulose business line is the largest contributor to the Group's carbon footprint, accounting for around 80% of the total. This is due to the fact that this business accounts for the majority of fossil fuel consumption (especially in the lime kilns of the bio-factories) and to emissions from forest management and wood and cellulose logistics, as well as the processing by customers of the paper pulp sold to them. The power plant business contributes 18.5% of the company's emissions, mainly emissions from the Lucena natural gas cogeneration plant and operations at the Huelva complex, while corporate and the renewable thermal energy generation and biomass trading businesses together account for 1.3%. The new bio-methane plant (La Galera) represents 0.3%.

### Emissions by gas type

The following table shows the contribution of each type of gas to the total Scope 1 and 2 emissions (in $tCO_2e$), with $CO_2$ gas accounting for the majority (85% of Scope 1 and 2 emissions). For this analysis only emissions within Scope 1 and 2 have been considered, as most of the Scope 3 emission streams have been obtained with emission factors represented in $tCO_2e$, which precludes a breakdown by gas type.

## Contribution of each type of GHG to Scopes A1+A2 emissions (t CO2e)[17]

| | CO2 | CH4 | N2O | HFCs | SF6 | CO2e |
|---|---|---|---|---|---|---|
| Total emissions | 233,354.6 | 5,881.4 | 35,576.8 | 497.6 | 2.1 | 275,312.5 |

### Emission intensity

## Emission intensity (Scopes 1, 2 & 3) (tCO2e /€M)(1)

| | 2023 | 2024 | 2025 | % N/ N-1 |
|---|---|---|---|---|
| Total emissions intensity (market-based) | 735.6 | 914.9 | 1,015.3 | 11% |
| Total emissions intensity (location-based) | 888.8 | 1,072.4 | 1,178.8 | 10% |

(1) Emission intensity = (Scope 1, 2 and 3 emissions (tCO2e))/(net revenue (€M)). The net income figure may be found in the Consolidated Annual Accounts under section "9. Ordinary income and other operating income".

The ratio of emissions intensity to turnover is not a representative KPI for Ence's activity. From an operational point of view, the emissions are related, in the case of pulp, to the volume of pulp produced while in the renewable electricity generation business it is related to the volume of electricity produced.

## Emission intensity (Scope 1 and 2)

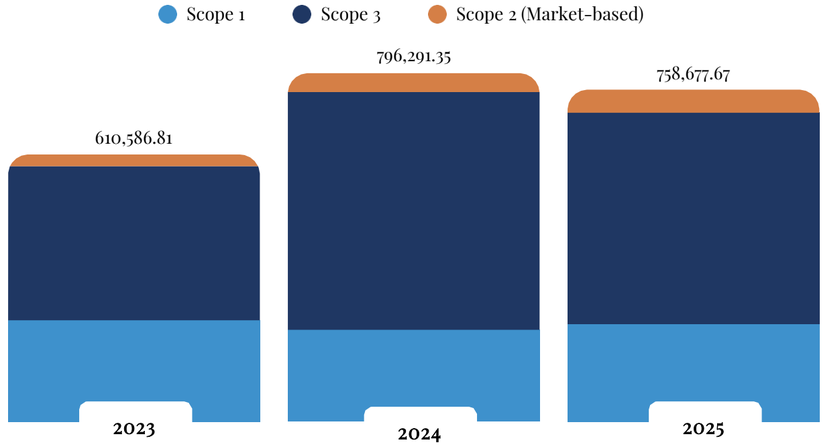
| | 2023 | 2024 | 2025 | % N/ N-1 |
|---|---|---|---|---|
| Pulp business (tCO2e /tAD)(1) | 0.15 | 0.147 | 0.107 | -27% |
| Power Plant Business (tCO2e /GWh) | 71.98 | 60.97 | 66.84 | 10% |

(1) Scope 1 and 2 emissions from the pulp manufacturing process, excluding emissions from the electricity generation process.

### Changes in the carbon footprint

In 2025, the carbon footprint has decreased by 4.7% compared to 2024, due to a reduction in indirect emissions (scope 3) by 11%. Direct emissions (A1) have increased by 6.1% (A1) and indirect emissions (scope 2) have increased by 22.3%. Variations in each scope are due to:

## Evolution in the Carbon footprint (tCO2e)




17. The CH4 emission factor from biomass combustion was obtained through direct measurements at the biomass boilers of the power plants.

- Scope 1 emissions have increased by 6.1% mainly due to higher fuel consumption at Pontevedra as a result of stop-starts due to strikes. However, in Navia, the consumption of fossil fuels has been reduced in favour of the use of bio-methanol and sawdust in line with the Decarbonisation Plan, which has allowed this facility to reduce its A1 emissions by 10%.

- Scope 2 emissions increased by 22.3% due to lower self-consumption and higher consumption of grid electricity linked to the decrease in electricity generation due to the non-availability in the pulp business of one of the generation turbines during the first months of the year.

- Scope 3 emissions decreased by 11%, as a result of:
  - Reduced material logistics due to increased local supply which means fewer kilometres of transport.
  - Decrease due to lower consumption of raw materials purchased in the bio-factories (mainly soda, sodium chlorate and sodium carbonate) in line with the 10% reduction in cellulose pulp production compared to the previous year.

### Biogenic emissions

In the process of burning biomass to generate renewable energy, Ence produces biogenic emissions.

**Biogenic emissions by scope**

| | Description | $tCO_2$ | $tCH_4$ | $tN_2O$ |
|---|---|---|---|---|
| Scope 1 | Emissions from the combustion of renewable biomass in Ence's power plants and bio-factories. | 3,760,612.2 | 187.0 | 124.0 |
| Scope 3 (1) | Emissions from the combustion of renewable biomass that Ence sells to its customers in the trading business | 32,178.1 | 4.9 | 3.2 |

(1) For the calculation of scope 3 biogenic emissions it is assumed that all renewable biomass sold in the trading business is consumed for energy uses as final destination. In addition, there are no doubt other biogenic emissions related to the accumulation of biomass at power plants. However, due to the fact that the emission factor is expressed in $tCO_2e$, it has not been possible to break them down by gas type. In addition, the agricultural biomass EF value is used as a reference for the calculation.

Both bio-factories and stand-alone power plants generate significant volumes of $CO_2$ which is a strategic opportunity for Ence to use in the manufacture of bio-fuels.

### Methodology for quantifying the Carbon Footprint

- **Scope** 1: calculated by multiplying the energy consumption by the emission factor. Energy consumption is obtained mainly from primary data (meters, delivery notes, mass balances) and for the selection of the emission factor, priority is given to official sources as close as possible to Ence's geographical context, such as the Spanish Office for Climate Change (OECC) in the case of CO2 or the IPCC for $CH_4$[8] and $N_2O$ emission factors. For installations in the (Navia, Pontevedra and Lucena), the same emission factors are used as in the greenhouse gas emission reports.

- **Scope 2**: calculated by multiplying the electricity consumption by the emission factor. Electricity consumption is obtained from primary data (meters or invoices) and the emission factor from the OECC.

- **Scope 3**: the methodology for quantifying the various GHG Protocol categories is summarised below:
  - Category 1 (Purchased goods and services): Goods and services purchased, multiplied by the specific emission factors for each category. Among the main goods and services are the consumption of materials, silviculture and the use of wood and biomass. Ecoinvent System Processes and the SimaPro application developed by PRé Sustainability (2022) were used to select emission factors for the consumption of materials.
  - Category 2 (Capital goods): Includes amounts billed for goods acquired in the various energy, cellulose, biogas and forestry businesses in the reporting period multiplied by the emission factors of each CNAE (National Classification of Economic Activities) code calculated according to the data available from the National Statistics Institute.
  - Category 3 (Fuel and energy-related activities (not covered by scope 1 or 2)): Indirect emissions are calculated for fuels not included in scopes 1 and 2 as well as emissions from the extraction, refining and transport of these fuels to the facilities where they are used (WTT - "Well to tank"). The emission factors used are those specific to the WTT category for each of these fossil fuels as published by DEFRA, the UK Department for Environment, Food & Rural Affairs.
  - Category 4 (Upstream transport and distribution): This includes emissions from upstream transport corresponding to the transport of wood and biomass from woodlands or third parties to the bio-factories or power plants. The WTT emissions of the fuels used as published by DEFRA are also included.
  - Category 5 (Wastes generated from operations): It is calculated on the basis of the actual waste data multiplied by the DEFRA emission factors depending on the final management of the waste.
  - Category 6 (Business travel): It is calculated on the basis of the mileage allowances for employee travel on the various modes of transport provided by the travel agency multiplied by the DEFRA emission factors.
  - Category 7 (Employees' commute): It is calculated on the basis of estimates of the distance travelled by employees from their respective homes to the workplace and vice versa, multiplied by the corresponding DEFRA emission factors.
  - Category 9 (Transport and distribution): It is calculated on the basis of the volumes of products destined for downstream customers (nursery seedlings, pulp and biomass shipped), the estimated transport distances and the relevant emission factors for such transport published by DEFRA.
  - Category 10 (Transformation of products sold): It is calculated taking into account the total billings for pulp sold, applying emission factors based on the CNAE code for the particular activity, calculated on data available from the National Statistics Institute, and specific emission factors provided by customers.

Finally, categories 8, 12, 13, 14 and 15 are not relevant for the Ence Group for the following reasons: in the case of categories 8 and 13, related to emissions from upstream and downstream leased assets, Ence manages leased woodlands whose emissions are included in the carbon footprint consolidation scope since it has operational control over these woodlands. Category 12 does not apply, since Ence's business model is B2B, in other words it does not sell products direct to end customers; category 14 does not apply since Ence does not have franchises, and finally, category 15 does not apply because there are no investee companies without operational control in terms that affect the calculation of the carbon footprint.

For global warming potential, we used the standard values provided by the OECC, published in 2025 and corresponding to 2024, which use the IPCC's AR6 values.

## 2.2.5.4 AVOIDED EMISSIONS, FOREST SINKS AND OFFSET CREDITS

Ence not only contributes to mitigating climate change by reducing its own emissions, but also by avoiding their generation through the production of renewable energy in its bio-factories and independent plants. Thanks to this renewable energy, in 2025 Ence avoided the emission of more than **582,000 $tCO_2e$.**

### Energy production (GWh)

| | Production (GWh) | | | Emissions avoided (t $CO_2$)(1) | | |
|---|---|---|---|---|---|---|
| | 2023 | 2024 | 2025 | 2023 | 2024 | 2025 |
| **Renewable** | **1,729.8** | **1,943.2** | **1,988.1** | **465,094.0** | **578,706.5** | **582,229.8** |
| Electricity from biomass in bio-factories and energy plants | 1,720.0 | 1,907.8 | 1,953.2 | 463,111.7 | 571,562.7 | 575,308.2 |
| Heat from biomass | 9.8 | 35.4 | 34.3 | 1,982.3 | 7,143.9 | 6,921.6 |
| **Non-renewable** | **138.4** | **171.7** | **190.3** | **-** | **-** | **-** |
| Electricity from natural gas | 64.7 | 70.1 | 80.8 | - | - | - |
| Heat from natural gas | 73.8 | 101.6 | 109.4 | - | - | - |
| **TOTAL** | **1,868.3** | **2,114.9** | **2,178.4** | **465,094.0** | **578,706.5** | **582,229.8** |

(1) Avoided emissions have been calculated taking into account both self-consumption (including PV) and the sale of electricity and renewable heat generated from biomass. For self-consumption and sale of electricity from renewable sources, we used the latest emission factor (EF) of the national electricity mix at the date of this report. It is published annually by the OECC and in this case is 0.283 kg CO2e/KWh. For the sale of heat from renewable sources, we used the EF for natural gas, 0.202 kgCO2E/KWhPCI as a reference.

Ence also contributes to the goal of climate neutrality through the conservation and promotion of forest areas that act as carbon sinks. In this regard, Ence's forestry plantations (own operations) absorb more than 700,000[18] metric tons of $CO_2e$ from the atmosphere each year. In net terms, Ence's forestry plantations absorb more carbon than is removed by their exploitation; in 2025 there was a positive balance of more than 360,000 $tCO_2e$. This $CO_2$ fixation, through biogenic storage in Ence's forests, is a nature-based solution. The risk of non-permanence due to reversion is related to the extraction of wood itself, for which Ence has a sustainable forest management model, or due to events such as fires, for which Ence has risk reduction measures in place, including, among others, clearing and fire watch measures. Ence is also making progress in research to capture biogenic $CO_2$ from its facilities for the production of renewable fuels.

Ence also promotes the creation and use of emission offset credits through projects registered in voluntary schemes, such as air$CO_2$ and the OECC, which can be used by other companies to offset their emissions. At the end of 2025, Ence had more than 4,300 ha of sinks registered in different voluntary schemes, including more than 2,300 ha within the OECC scheme. The company is currently working towards increasing this figure by adopting additional biodiversity criteria in line with EU guidelines.

18. For the calculation of removals and net carbon balance, we used as a reference the methodology proposed in the 2006 IPCC Guidelines for National Greenhouse Gas Inventories, Volume 4: Agriculture, Forestry and Other Land Use. For the calculation of the removals of Ence's plantations, account was taken of the carbon absorbed by the growth of Ence's forest mass in the reporting period. This carbon is removed from the atmosphere by absorption of carbon dioxide (CO2) particulate matter; this is the equivalent amount of CO2 absorbed by plants to incorporate that amount of carbon into their tissues. For the calculation of the net carbon balance, the carbon removed from the forest stand due to wood and biomass extraction is deducted from the removals. Net balance = Annual carbon gain (carbon absorbed by plantations) - carbon removal (carbon removed by wood and biomass extraction).

### 2.2.5.5 EU EMISSIONS TRADING

Independently of the calculation of Ence's organisational footprint, the Navia, Pontevedra and Lucena facilities are subject to the EU Emissions Trading System (EU-ETS). Emissions from the use of fuels in these plants are therefore subject to annual audits and verifications as part of the reporting. In 2025, 77.2% of the emissions included in Ence's global carbon footprint (Scope 1) are included in the ETS.

### 2.2.5.5 INTERNAL CARBON PRICE

The internal carbon price is a strategic tool that enables Ence to assign a monetary value to the $CO_2$ emissions generated by its operations. This measure facilitates the internalisation of the environmental cost of emissions, promoting business decisions aimed at reducing greenhouse gases. By applying this simulated price in all its business lines, Ence reinforces its commitment to decarbonisation, integrating this variable into investment decision-making and business model development.

The methodology used to define this price, consistent with the financial statements, is based on the evolution of the value of $CO_2$ for direct emissions (Scope 1) in the European market, specifically on the European Union Allowance (EUA) price, a reference unit within the Emissions Trading System (ETS). The EUA is a unit of allowances that allows companies to emit one metric ton of carbon dioxide ($CO_2$) within the ETS. This EU system sets a limit on the GHG emissions that certain sectors can emit, and the companies included must have EUAs equivalent to their annual emissions.

The price of EUAs, which is determined in the carbon market, represents the "$CO_2$ price" within the ETS. This price is set according to the supply and demand for allowances: when demand is high or the emissions cap is tighter because the supply of free allocation is reduced, the price of EUAs tends to increase, making it more expensive to emit $CO_2$. This dynamic encourages companies to reduce their emissions to avoid additional costs, thus promoting the transition to a low-carbon economy. The EUA and its price is a key benchmark for many companies in defining the costs associated with $CO_2$ emissions and providing an objective and up-to-date basis reflecting the value of carbon in the European market.

In this respect, Ence adjusts its internal carbon price in line with $CO_2$ market trends, incorporating updated forecasts that allow a more robust financial planning aligned with long-term climate policies. This adjustment has been key to reinforcing the economic viability of projects that prioritise clean technologies, energy efficiency and fossil fuel substitution.

In addition, the internal carbon price has been consolidated as a central element in Ence's growth strategy, especially in areas such as trading biomass and renewable thermal energy. In these businesses, where customers are often subject to the ETS, the cost of the EUA is a determining factor in assessing the profitability of projects.

Ence therefore incorporates this variable in its financial models and in the design of its offers, ensuring that the proposed solutions respond to both sustainability objectives and the economic demands of the market.

## 2.3 Pollution (E2)

The prevention of air, water and soil pollution, as well as noise, odour and light pollution, is a key core concept of Ence's environmental commitment. As proof of this, one of the strategic pillars of the new 2024-2028 Master Plan focuses on eco-efficient operations, seeking to achieve environmental excellence in all the company's operations and establishing qualitative and quantitative objectives in environmental parameters such as noise, odour and air quality.

### 2.3.1 Impacts, risks and opportunities

Through the update of the double materiality analysis described in section ***1.4.4 Double Materiality Analysis***, a specific analysis was carried out to identify and assess the impacts, risks and opportunities related to pollution. For this purpose, both in-house experts and external stakeholders were consulted.

### 2.3.1.1 IMPACTS

As in any industrial process, the absence of appropriate technologies and proper operational management could lead to negative environmental impacts, such as water, air and soil pollution. To prevent this, Ence applies Best Available Techniques (BAT) in its processes and makes environmental management one of the cornerstones of its corporate policy. In any case, potential impacts have been identified in the different business lines and their value chains which, if not detected, managed and mitigated in a timely manner, could materialise.

| Impact | Description of the impact | Prevention / mitigation measures |
|---|---|---|
| I1: Air pollution (C / OO, VC) | Ence's industrial activities involving combustion processes may generate pollutant emissions such as particulates, SO2, CO or NOx. These emissions also occur in harvesting, forestry and logistics activities, as a result of fossil fuel combustion in machinery. In addition, transport vehicles for delivery or distribution generate dust. | The company has abatement systems that reduce these emissions below the limits established in the plants' integrated environmental authorisations, thus ensuring that there are no negative impacts on the environment. To reduce dust, Ence has specific procedures and measures such as the use of tarpaulins and road watering to reduce this impact. |
| I2: Water pollution (C / OO, VC) | Industrial activities produce wastewater flows that must be treated to avoid possible polluting discharges into the receiving environment. In terms of the value chain, the same is true of the industrial production processes for many of the raw materials (especially chemicals products) that Ence buys. | Ence implements various measures to reduce the pollutant loads in the discharge water (e.g. processes in effluent treatment plants), ensuring water quality levels that are below the limits established by the administration and preventing the generation of environmental damage. |
| I3: Soil pollution (P / OO, VC) | Accidental discharges or spills at Ence's facilities could affect the soil or groundwater. In terms of the value chain, potential impacts on soil can occur in forestry activities, due to oil spills or fuel leaks on unprotected soils, which in any case would be very limited given that the presence of fuels is reduced, linked to the use of fossil fuels in mobile equipment. | Ence's industrial facilities are developed in environments prepared to prevent soil pollution (closed storage facilities; leak detection systems in tanks and reservoirs; paving and waterproofing of surfaces and redirection of water; in the event of emergency spills, to dedicated treatment facilities; retention basins, etc.). Potential pollution in soils and groundwater is monitored periodically by taking samples through piezometers. In the case of future projects with potential impacts in this sense, such as bio-fertiliser and bio-methane plants, which need to store raw materials in the facilities (slurry, agricultural and livestock waste, etc.), this aspect is taken into account in the design to minimise risk. |
| I4: Noise pollution (*Entity-specific*) (1) (C / OO, VC) | Ence's industrial and forestry activities generate noise that must be attenuated so as not to affect the people who work at the facilities or cause nuisance that could affect nearby communities. Acoustic impacts also occur throughout Ence's value chain, both in the industrial facilities of its raw material suppliers and in the transport of materials upstream and downstream of Ence's plants. | Ence manages the potential acoustic impact at its plants by establishing soundproofing measures for equipment and enclosures, installing silencers, screens and acoustic cladding, etc. Ence also carries out regular noise level measurements at different times of the day. |
| I5: Odour pollution (Entity specific) (1) (C / OO, VC) | Some of Ence's industrial processes, such as pulp production and the production of bio-methane and bio-fertilisers, can generate odours which, if not properly managed, can lead to rejection by the local community and the loss of the social licence to operate. With regard to the value chain, the main odour focus would be the agricultural and livestock facilities where the raw materials for the bio-methane plants originate. | At its bio-factories, Ence has implemented the Zero Odour Plan through the installation of systems dedicated to odour abatement, continuous SH2 meters, operational improvements and a predictive model to anticipate and minimise odour events. Ence has also set voluntary targets to ensure that odour levels do not affect local communities. During 2025, as a result of the effort to reduce odour levels, the Navia bio-factory has reached its all-time record with 0 odour minutes recorded. At its bio-methane plants, the facility is designed to prevent odours, and before deciding on its location, odour studies are carried out to avoid locating the facilities in areas where they could affect local communities. |

C: Current; P: Potential / OO: Own Operations; VC: Value Chain

(1) Entity specific refers to positive and/or negative impacts specific to the Ence Group's business model.

Ence's operations also generate **positive impacts** such as the reduction of potential soil and groundwater pollution thanks to the removal of agricultural, forestry and livestock waste for use in the production of renewable energy, bio-methane and bio-fertilisers. In the case of bio-fertilisers, their application provides a solution to the problem of highly nitrified soils contaminated by the intensive use of chemical fertilisers. Chemical fertilisers, rich in ammoniacal and nitric nitrogen, generate nitrate accumulation causing leaching problems with pollution of soils, aquifers and loss of biodiversity. In contrast, bio-fertilisers combine the benefits of organic fertilisers and mineral fertilisers by providing nutrients in a stable and balanced way, offering an immediate release of nutrients for a quick response while promoting soil microbial activity, improving water accumulation and providing more balanced and sustained nutrition without the risks of nitrate pollution while improving soil structure.

## 2.3.1.2 RISKS AND OPPORTUNITIES

### Risks

Proper risk management **minimises the negative impacts** that air, water and soil pollution, as well as noise, odour and light pollution, can have on the environment and nearby communities. The main risk associated with pollution is presented below:

| Impact | Description of the impact | Prevention / mitigation measures |
|---|---|---|
| R1: Penalties for exceeding the permitted pollution limits | Failure to comply with the limits established in the environmental authorisations of Ence's plants, whether in terms of emissions into the air, water or soil, could lead to the imposition of penalties on the company. In addition, the risk of not meeting odour reduction targets in bio-factories, even if these are not directly regulated in environmental authorisations, could compromise the social licence to operate, negatively affecting the relationship with neighbouring communities. | Ence regularly monitors all environmental parameters and sets operating targets, below the limits established in the environmental authorisations, to ensure that the legal limit is never exceeded. With regard to odour, Ence has set voluntary targets to ensure that neighbouring communities are not affected. |

The pollution-related risk management process is integrated into the company's global risk management process described in section *1.4.6.6 ESG risk identification, assessment and management process* and the risks described here are integrated into Ence's Risk Map. Each facility or project addresses the identification and management of its environmental risks in a specific way.

### Opportunities

The main opportunity related to this aspect is the **improvement of its corporate reputation** through the implementation of internal standards that are more restrictive than those established by current legislation. This approach not only reinforces Ence's commitment to sustainability and transparency, but also enhances the trust of its stakeholders, including investors, customers and local communities. In addition, the adoption of more rigorous measures can position Ence as a benchmark in the sector, contributing to the generation of long-term value.

### Cross-cutting mitigation measures

Ence's environmental risk management model is based on going beyond compliance with current legislation, applying the principles of prevention and precaution and following the principle of continuous improvement. In its environmental management, Ence has been applying the TQM (Total Quality Management) model for more than 15 years. This model incorporates not only environmental protection and pollution prevention, but also quality, safety and health. In this sense, the Navia bio-factory was awarded in 2025 with the "Quality Innovation Award" in its international phase, for its application of continuous improvement tools for environmental improvement and to achieve the social licence to operate, it had already been awarded with this prize in the national phase during the year 2024.

Within the framework of this model, a series of Fundamental Improvement Objectives (FIOs) are established annually to ensure the adequate management and mitigation of risks derived from the following environmental vectors:

- Reducing the impact on air quality (emissions)
- Reducing the impact on water quality (effluents)
- Reducing the noise impact of operations
- Reducing the impact of odours
- Reduction of water consumption
- Reduced consumption of raw materials
- Reducing waste generation
- Improved energy efficiency
- Improving the governance of management systems

### Environmental risk prevention tools

Ence complements its TQM model and the OMFs with specific tools aimed at the proactive prevention of environmental risks in its operations:

- **Management of Work with Special Environmental Risks (WSER):** the aim is to anticipate and plan those interventions that may involve environmental risks not covered by internal protocols. These works require prior assessment by the environmental team and approval from the chain of command, ensuring that preventive measures are implemented prior to execution, and that they are efficiently communicated to the parties involved.

- **Risk management through Environmental Preventive Observations (EPO):** the aim is to identify and correct practices or conditions that deviate from the company's environmental principles, through continuous on-site monitoring by the chain of command. This approach encourages ongoing improvement and the active involvement of staff in environmental performance.

Both initiatives seek to consolidate an organisational culture based on environmental responsibility and risk anticipation. They represent **a practical application of the precautionary principle,** by prioritising rigorous assessment of potential risks before taking action, especially in new situations or situations with limited information. Ence establishes as a key criterion that no intervention should be approved without first ensuring that the prevention and containment measures are sufficient to minimise any environmental risk.

### Pollution prevention using Best Available Techniques (BAT)

Another of the pillars of Ence's environmental management model and a tool for managing environmental risks in general and pollution prevention in particular is the application of Best Available Techniques (BAT), as defined in Directive 2010/75/EU on industrial emissions (integrated pollution prevention and control). In conducting its business, Ence adapts its processes to the BATs in accordance with Best Available Techniques in the Pulp and Paper Industry 2014, as well as the BATs established for large combustion plants (LCPs) in 2017.

As part of its process of adaptation to BATs, Ence has focused on the implementation of different types of emission purification systems according to the needs of each plant. Thus, in both bio-factories, with the aim of reducing particulate matter emissions, the electrofilter system of the biomass boiler has been improved.

All Ence's industrial plants have their Integrated Environmental Authorisation (IEA) or Industry Authorisation, which establishes the environmental conditions for the operation of the facilities. These authorisations include, at the discretion of the administration, the maximum emission values based on the BATs as well as the monitoring plans for all relevant environmental aspects. In this respect, Ence sets internal operation targets to not only meet, but improve on the limits defined in its IEAs, regularly reporting to the competent authorities on their evolution. The IEAs of Ence's plants are publicly available in the registers of the administrations of the corresponding Autonomous Communities.

In 2025, the AAI was granted to Ence's new bio-fibre plant in As Pontes, a pioneering project that will produce some 100,000 tonnes per year of bleached pulp from recycled paper and cardboard. This facility stands out for incorporating chlorine-free bleaching technology, operating without fossil fuels and being supplied with locally sourced renewable energy (biomass), which eliminates emissions associated with fossil fuels.

### Environmental risk analysis

Ence also identifies environmental risks through Environmental Risk Analysis ("ARMAS" in the Spanish acronym), in accordance with legislation on environmental responsibility (Law 26/2007), in the periodic assessments of the environmental aspects defined in its Environmental Management System, and in the case of the pulp bio-factories in the context of the analysis of process risks within the PSM (Process Safety Management) strategy. This process makes it possible to identify potential situations that could lead to environmental impacts and to establish preventive measures to avoid this happening.
In addition, Ence carries out regular internal and external audits to assess, among other things, the implementation of prevention measures at the plants. The company also has a Management of Change (MOC) procedure that evaluates the possible consequences of any changes, including changes in the industrial process, affecting health, safety or the environment, before such changes are made, establishing the necessary preventive measures.

### Environmental certifications

Ence's Integrated Management System, which includes environmental management, has been certified in accordance with the following international standards:

| Site | ISO 45001 Health and safety | ISO 14001 Environment | ISO 9001 Quality | ISO 50001 Energy efficiency | EMAS | Zero Waste (1) | Nordic Swan | EU Ecolabel | ISO 22001 Food security | Sure System (2) | ISCC System (3) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Pontevedra Bio-factory | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | |
| Navia Bio-factory | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | |
| Huelva Energy Complex | ✓ | ✓ | ✓ | | | ✓ | N/A | N/A | | ✓ | |
| Mérida Plant | ✓ | ✓ | | | | ✓ | N/A | N/A | | ✓ | |
| Lucena Plant | ✓ | ✓ | | | | ✓ | N/A | N/A | | ✓ | |
| Enemansa Plant | ✓ | ✓ | | | | ✓ | N/A | N/A | | ✓ | |
| La Loma Plant | ✓ | ✓ | | | | ✓ | N/A | N/A | | ✓ | |
| Biollano Plant | ✓ | ✓ | | | | ✓ | N/A | N/A | | ✓ | |
| La Galera Plant | | | | | | | N/A | N/A | | | ✓ |

(1) Aenor Zero Waste certification guarantees that at least 90% of the waste generated is recycled or recovered.
(2) The SURE certification of biomass sustainability ensures compliance with the requirements of the Renewable Energy Directive.
(3) ISCC certification of bio-methane sustainability ensures compliance with the requirements of the Renewable Energy Directive.

This system is certified by accredited bodies that carry out annual audits. In addition to these certifications, in 2025, Magnon has renewed the AENOR "Circular Economy Strategy" certification, which demonstrates the circularity of the business model based on the use of agricultural and forestry waste to generate energy (electricity or heat).

## 2.3.2 Environmental policy

Ence has a Corporate Environmental Policy approved by the Board of Directors, which formalises and develops the company's commitment to environmental protection in its operations. Among other things, the policy establishes as basic principles the protection of the environment and the reduction of Ence's environmental impact in its direct operations and throughout its value chain. To this end, the policy determines that the company will take care to analyse and understand the nature and magnitude of the potential environmental impacts of its activities, products and services and will apply the principle of the mitigation hierarchy (avoid, minimise, restore, and as a last resort, offset impacts).
This policy establishes the **principles of action** including the prevention of environmental impacts, the prior assessment of risks in projects, the planning of operations with potential impact, incident preparedness, ongoing monitoring of environmental performance, choice of technologies that minimise impact and responsible management of hazardous substances in accordance with REACH. These policy principles are defined in such a way as to cover the impacts, risks and opportunities identified in section ***2.3.1 Impacts, risks and opportunities.*** The policy is available to all stakeholders on the company's website.

DOWNLOAD THE POLICY
ENCE'S WEBSITE

## 2.3.3 Objectives, actions and resources

### Strategy and Objectives

The prevention of air, water and soil pollution is a key core concept of the Sustainability Master Plan 2024-2028. Within its strategic pillars, the Eco-efficient Operation approach drives specific initiatives to reduce impacts associated with noise, odour and dust, reinforcing the relationship with local communities (see section 1.4.5 2024-2028 Sustainability Master Plan and annual targets).

| Line of action | IRO | Objective | Type of objective | Business | 2025 Objective | 2025 Performance | 2026 Objective | 2028 Objective |
|---|---|---|---|---|---|---|---|---|
| Maintain social licence to operate (odour and dust) | I1 / I5 / R1 | Reduce minutes of odour | Voluntary | Pulp (Pontevedra) | 60 min | 108 min (1) | 60 min | Pulp: <60 min/year (2028) |
| | | | Voluntary | Pulp (Navia) | 40 min | 0 (all-time high) | 35 min | |
| | | Improvement of air quality - Particulate matter reduction | Voluntary | Pulp (Pontevedra) | 42 mg/Nm3 (Biomass boiler particulate matter) | 31 mg /Nm3 | 40 mg/Nm3 (Biomass boiler particulate matter) | N/A |
| | | | Voluntary | Pulp (Navia) | 17 mg/Nm3 (Biomass boiler particulate matter) | 8 mg /Nm3 | 12 mg/Nm3 (Biomass boiler particulate matter) | |
| | | | Voluntary | Renewable Energy | Implementation and monitoring of the Preventive Air Quality Improvement Plans defined in 2024 | Completed | N/A | |

(1) Isolated episodes with odour emission occurred during 2025. By the end of the year, the incidents detected in the equipment that led to odour episodes had been resolved.

In addition to the specific objectives for the control of atmospheric pollution, Ence has measures in place to ensure compliance with the emission limits established in its environmental authorisations, including discharge parameters (BOD, COD), atmospheric emissions (NOx, $SO_2$, $NH_3$hCl) and noise pollution.

The targets, defined within the framework of the Sustainability Master Plan with the participation of the responsible operating areas, are based on historical data and sectoral trends, and complement current legal requirements.

### Actions and resources

**Pulp:**

During 2025, and within its Strategic Plan 2024-2026 to implement PSM - Process Safety Management, the bio-factories analysed the events that could potentially give rise to an environmental impact and/or security, categorising them in terms of risk. A guide to safeguards to be applied to reduce the risk potential of such events has also been developed.

The improvement of the first phase of the project for the **acoustic attenuation** of the Navia Bio-factory was also finalised and evaluated, and based on the new modelling, actions have been defined for the new phases. The Pontevedra factory successfully managed to maintain production during the worst annual drought periods thanks to the reuse of its effluent discharge. In this regard, **as regards the discharge of** liquid at the Pontevedra bio-factory, in 2025, the results achieved in previous years will be maintained. All the plant's effluent parameters are well below the limits set in the IEA, including COD (Chemical Oxygen Demand), the main measure of effluent quality, which improved by 55% on the limit set in the discharge permit, standing at 3.06 kg/tAD compared to the maximum of 7 kg/tAD. The evolution of this data confirms the progress made by the bio-factory in terms of the quality of its final effluent, with COD improving by 85% above the upper reference range set by the BREF best environmental practices for the pulp sector for this parameter, making it a benchmark plant.

With regard to **improvements in air quality,** in Pontevedra the improvement achieved in particulate matter emissions from the biomass boiler is worth highlighting, which has made it possible to anticipate the new legal requirements applicable in 2025 since 2024, and the level of compliance has been maintained since then.

On the other hand, cellulose bio-factories as a consequence of their robust **Zero Odour Plans** have continued to reduce odour minutes, with Navia the historical record of no odour minutes during 2025.

Actions carried out at Navia included the sealing of the DAF (Dissolved Air Flotation) system and the replacement of the scrubber in the effluent neutralisation chamber. In 2025, Ence has reinforced its environmental commitment through the launch of the Competitiveness Plan, which includes investments aimed at decarbonising bio-factories, improving water and energy efficiency, digitalising processes and promoting special products. Within this framework, the modernisation of the wood yard and the substitution of natural gas consumption by biomass in the lime kilns has begun in Navia, which will reduce direct emissions by 60% and significantly improve operational efficiency.

**Energy**:

Ence, through its subsidiary Magnon, continues to promote the development of projects for the capture and recovery of $CO_2$ to produce green methanol (e-methanol) at its plants in Huelva, Mérida and Puertollano.

In addition, it continues to implement ongoing measures to improve air quality at its power plants. Examples include dust control through irrigation and cleaning of fields, optimisation of biomass unloading and transport processes, and the use of physical barriers such as vegetation screens and truck tarpaulins. These measures are adjusted according to operating conditions to ensure environmental compliance and minimise the impact on the environment.

Finally, the objectives set and actions carried out in relation to pollution are aimed at preventing, mitigating, and where necessary, remedying the actual and potential impacts identified, as well as addressing the risks and opportunities, all of which are analysed in the double materiality analysis (see *2.3.1 Impacts, risks and opportunities*).

### Earmarked resources

In 2025, the total investment (Capex) related to pollution prevention (improvement of the environmental performance of the facilities) amounted to more than €2 million.

- The reduction of **odour** has concentrated more than 45% of the investment, with actions for odour treatment at the La Galera bio-methane plant (≈€1 million) standing out.
- The prevention of **water pollution** accounted for 28% of investment, with particular emphasis on measures in Pontevedra related to process improvements resulting in higher effluent quality, as well as measures to improve discharge measurement systems.
- Actions aimed at reducing atmospheric **pollution** accounted for 24% of the investment, with particulate matter control and pollutant gas purification systems (electrostatic precipitators and scrubber dissolving equipment) or investments aimed at improving combustion conditions that reduce emissions of pollutant gases into the atmosphere.
- With regard to **noise**, the actions carried out at the Navia bio-factory stand out.
- For the prevention of **soil pollution**, investments have been made to improve the storage of chemicals.

During 2025, no investments (CapEx) or operating expenses (OpEx) related to environmental incidents caused by Ence's activities were recorded.

## 2.3.4 Metrics

### Atmospheric emissions and discharges

The following is a list of the air emissions and discharge parameters. This information includes the data of all the facilities over which Ence has operational control, as well as the obligation to notify the emission values in accordance with Appendix II of Regulation (EC) No 166/2006 establishing the European Pollutant Release and Transfer Register (E-PRTR). These data are reported annually by all facilities to the state registry (PRTR-Spain)[19].

19. Facility level data are publicly available from the State Pollutant Release and Source Register (PRTR-Spain). The reporting of data at the facility level in PRTR-Spain is subsequent to the issue of the Sustainability Report, which could therefore be modified if more updated or accurate information becomes available at a later date. In the event of discrepancies between the data published in the Sustainability Report and PRTR-Spain, the latter prevailing as the official source. Ence does not use or generate microplastics in its processes.

| Air Emissions (PRTR España, the State Emissions Register) | Methodology (1) | 2024 (2) | 2025 |
|---|---|---|---|
| | | Kg/year | Kg/year |
| Carbon monoxide (CO) | M / C | 3,467,525 | 4,189,324 |
| Nitrogen oxides (NOX/NO2) | M / C | 3,237,440 | 3,357,666 |
| Non-Methane Volatile Organic Compounds (NMVOCs) | C | 374,207 | 359,441 |
| Sulphur oxides (SOX/SO2) | M / C | 202,780 | 250,784 |
| Particulate matter (PM10) | M / C | 117,817 | 189,883 |
| Total suspended particulate matter (TSP) | M / C | 115,940 | 124,631 |
| Ammonia (NH3) | M / C | 69,385 | 72,815 |
| Chlorine and inorganic compounds (such as HCl) | M / C | 89,326 | 48,423 |
| Other compounds (3) | M / C | 49,999 | 26,592 |

| Discharge parameters (PRTR España) | Methodology (1) | 2024 (2) | 2025 |
|---|---|---|---|
| | | Kg/year | Kg/year |
| Total organic carbon (TOC) | M / C | 1,089,054 | 671,958 |
| COD | M / C | 26,001 | 45,085 |
| Total Nitrogen | F | 33,194 | 28,237 |
| Total phosphorus | M / C | 25,704 | 20,121 |
| Chlorides (as total Cl) | F | 148,164 | 158,308 |
| Halogenated organic compounds (such as AOX) | F | 8,922 | 5,557 |
| Trichloromethane | F | 0 | 5,220 |
| Other compounds (3) | M / C | 1,089 | 2,695 |

(1) Measured (M); Calculated (C); Estimated (E).
(2) Updated data based on official data published in PRTR-España.
(3) The rest of the compounds reported in PRTR-Spain are included in ***Appendix III Environmental and social indicators.***.

The total amount of air emissions and discharge emissions for some parameters have increased in 2025 compared to 2024 due to, among others, the commissioning of the Enemansa plant. In 2025 there were no accidental spills at any of the facilities.

## Volume of effluents (thousands of m³)

| | 2023 | 2024 | 2025 |
|---|---|---|---|
| Total | 26,386.90 | 26,683.20 | 26,218.90 |

Ence continuously monitors environmental parameters, reporting monthly to the Board of Directors on its compliance with the limits established in the industry's Environmental Authorisations and BATs. For this purpose, it uses measuring equipment subject to calibration plans and direct measurements carried out by Authorised Control Bodies (ACOs). Where specific equipment does not exist or units need to be converted, calculation models based on the technical characteristics of the installations are applied, ensuring data reliability and traceability.

## Noise

| Period (1) | 2023 | 2024 | 2025 |
|---|---|---|---|
| **Navia (dBK)** | | | |
| Morning | 62.4 | 61.3 | 59.4 |
| Afternoon | 62.5 | 60.6 | 59.2 |
| Night | 61.5 | 61 | 58.8 |
| **Pontevedra (dBK)** | | | |
| Morning | 65 | 62 | 62 |
| Afternoon | 65 | 61 | 61 |
| Night | 54 | 55 | 53 |
| **Huelva (dBA)** | | | |
| Morning | 67 | 63.7 | 63.7 |
| Afternoon | 67 | 63.7 | 63.7 |
| Night | 66 | 53.4 | 53.4 |

(1) Data from the last regulatory check

**Odour**

In 2025, Navia has an all-time record with no odour minutes recorded during the year.

### Odorous impact index

| Bio-factory | 2023 | 2024 | 2025 |
|---|---|---|---|
| Navia | 0.17 | 0.12 | 0.09 |
| Pontevedra | 0.05 | 0.03 | 0.03 |

### Odour minutes

| Bio-factory | 2023 | 2024 | 2025 |
|---|---|---|---|
| Navia | 35 | 21 | 0 |
| Pontevedra | 133 | 87 | 108 (1) |

(1) By the end of the year, the incidents detected in the equipment that led to odour episodes had been resolved.

## 2.4 Water resources (E3)

Ence integrates efficient water management as an essential part of its industrial activity. In **cellulose production bio-factories,** water is used in key processes such as wood cooking, washing and cooling, so these facilities are located in areas with guaranteed access to fresh water. In **biomass power plants,** water is mainly used to generate steam and as a coolant, using sources such as rivers, reservoirs, groundwater, municipal supplies and reclaimed water from urban wastewater treatment plants (e.g. in Lucena).

Water efficiency is a cross-cutting principle: Ence designs its processes to optimise water consumption, guarantee supply in periods of scarcity through recirculation and improve effluent quality, minimising the impact on aquatic ecosystems.

In **forestry activities,** Ence does not use water, as forestry crops do not require irrigation and the agricultural biomass used comes from non-usable waste, not from crops intended for energy recovery.

In the case of the **bio-fertiliser and bio-methane business,** the design of new plants includes requirements for not requiring external water inputs. The required water is extracted and recirculated from the process itself, even generating surpluses that are stored for agricultural irrigation.

This approach is also applied to **new project developments,** such as the recovered pulp plant in As Pontes, which will use water from an artificial lake and recirculate part of the effluent, as well as reusing clean rainwater.

Ence does not use seawater or other marine resources in its operations or in the value chain; the only interaction is the discharge of treated effluents through submarine outfalls in Navia and Pontevedra, the risks of which are analysed in chapter *2.3 Pollution.*.

**Collection, consumption and discharge**

In terms of collection, consumption and discharge, most of the water collected is used in industrial processes and is returned to the environment, after treatment, at authorised points or evaporated during cooling. In power plants, the difference between collection and discharge is also explained by evaporation in cooling systems.

Thanks to this approach, more than 85% of the water collected by the Group is returned to the receiving environment, always after treatment and at authorised points.

### 2.4.1 Impacts, risks and opportunities

Through the updating of the double materiality analysis described in *1.4.4 Double materiality analysis*, a specific analysis was carried out to identify and evaluate the impacts, risks and opportunities related to the management of water and marine resources. During the process, consultations were undertaken both with the Group's own expert staff and with other external stakeholders.

#### 2.4.1.1 IMPACTS

Ence understands that water is not only a key resource, but also a critical factor in the sustainability of its operations. It is therefore working to optimise its use in every process, aware that its power plants and, above all, bio-factories require significant volumes to operate efficiently. This commitment involves identifying and managing the possible **negative impacts** derived from water consumption, both at its facilities and along the value chain. These include:

| Impact | Description of the impact | Prevention / mitigation measures |
|---|---|---|
| I1: Impact on surface water sources (C / OO) | Water use in the cellulose production process at the Navia and Pontevedra bio-factories, with direct interaction on surface sources. | Ence is planning to reduce water consumption at both plants and initiatives to use alternative water sources, such as water from wastewater treatment plants. In addition, Ence continuously monitors the ecological flows of the rivers that supply it with water, so that the extraction of water for its industrial facilities does not affect minimum flows or jeopardise ecosystems or the availability of resources for other priority uses, such as human consumption. |
| I2: Variation of river flows (C / VC) | Variation in river flows associated with reservoirs supplying some of Ence's facilities. Although Ence is not involved in the construction of these infrastructures, the value chain is included in the analysis due to its dependence on the operation. | Ence ensures that it respects the ecological flow rates established by the competent bodies and draws up plans to reduce water consumption at its facilities in order to minimise the need to draw water from these sources. In addition, in plants such as Lucena, the company has become independent of natural water sources and works with reclaimed water from the municipal WWTP, so that it does not affect natural watercourses, without affecting natural flows. |
| I3: Effluent-related impacts (P/ OO) | The possible effects on the quality of the effluents generated by Ence's facilities that could affect water quality are detailed in chapter ***2.3 Pollution*** of this report. | See I2: Water pollution from section ***2.3.1.1 Impacts***. |
| I4: Eutrophication of groundwater (P/ VC) | Although it does not derive from Ence's direct operations, in the value chain of the bio-fertiliser and bio-methane business, potential inadequate storage practices and uncontrolled dumping of slurry and other livestock waste could generate eutrophication processes in groundwater. | Ence provides a solution for livestock farmers, as its plants not only manage this waste for the production of bio-methane, but the digestate is transformed into bio-fertilisers that are applied in a controlled manner and in a much larger radius, thus avoiding soil and groundwater pollution. |

C: Current; P: Potential / OO: Own Operations; VC: Value Chain

Ence's operations also have **positive impacts** and actively contribute to improving water availability and quality. In the newly designed bio-fertiliser and bio-methane plants, the production process allows irrigation water to be obtained from inputs such as slurry and livestock manure. Thanks to their treatment, these wastes no longer represent a threat to aquifers and are transformed into a useful source for agriculture. The solid organic bio-fertilisers produced will contribute to solving the problems of high nitrification caused by chemical fertilisers that generate nitrate leachates, as they are a more stable and balanced way of avoiding soil and aquifer pollution.

Moreover, water reuse projects at the Pontevedra Bio-factory have a direct positive effect, as they reduce surface water abstraction from the Lérez River through the use of reclaimed water from the industrial waste water treatment plant (IWWTP) or reclaimed water from the waste water treatment plant (UWWTP).

### 2.4.1.2 RISKS AND OPPORTUNITIES

#### Risks

Most of the risks related to the use and management of water resources are described in chapter ***2.2 Climate change***, as they have been included in the Ence Group's global climate risk analysis. This is because climate change directly affects the availability and quality of water, which represents a major challenge for Ence's operations in terms of the stability of supply at its production plants and the growth of the biomass on which the business depends

The impact of climate change, especially physical effects such as increased droughts or variability in precipitation patterns, directly influences the availability of water for operations. As part of this analysis, Ence has identified the following risks, which are detailed in chapter ***2.2 Climate change:*** R1: Availability of water resources; R2: Increase of salinity in the Navia bio-factory; R3: Increased operational costs due to higher water prices; and R4: Competition for water resources.

Furthermore, when analysing all risks related to water resources, Ence takes into account the level of water stress in the basins and regions where its facilities are located. The water stress analysis is undertaken with the Aqueduct tool of WRI (World Resources Institute). According to WRI, water stress measures the ratio between total water demand and available renewable surface and groundwater reserves. Water demand includes domestic, industrial, irrigation and livestock uses. Available renewable water supplies include the upstream impact of consumers and large dams on the availability of the water resource downstream. Aqueduct's analysis offers a localised analysis including risk analysis at the level of river basins. The facilities of the bio-factories with the highest consumption are located in areas at risk of low water stress, according to the WRI (World Resources Institute) Aqueduct model:

| Site | Main source of supply | WRI Risk Level (Water Stress) |
|---|---|---|
| Navia | Surface water: Navia river | Low |
| Pontevedra | Surface water: Bora diversion weir on the Lérez River | Low-Medium |
| Biollano | Surface water: Montoro reservoir | Low |
| Merida | Surface water: Guadiana river | Medium-High |
| Enemansa | Groundwater. Aquifer borehole 23 | High |
| Huelva | Surface water: El Sancho dam on the Tinto river | Very High |
| La Loma | Municipal supply | Very High |
| Lucena | Wastewater. Lucena WWTP | Very High |
| La Galera | Groundwater (well) | Low |

For plants in areas with very high water stress, such as La Loma, responsible solutions have been adopted not to draw water from natural sources, neither from surface water nor groundwater, but only from the municipal supply, ensuring that the water pressure in the environment is not aggravated. In Lucena, following the same principle, reclaimed water from the local WWTP is used. In the Huelva complex, the supply comes from the El Sancho dam, which is intended solely for Ence's industrial use.

Ence undertakes a specific analysis of the water resource situation at its biomass electricity generation plants. This is the **Water Map**, which analyses the following variables for each facility, among others:

- External factors: potential impacts due to ecological flows, changes in supply, competition for water use and history of restrictions.
- Inlet water quality and management: analysis derived from the control of the volume and quality of the inlet water, including previous treatments.
- Outlet water quality and management: monitoring of water volume and quality after use.
- Internal and external pipes: assessing the condition and maintenance management of the plant's external and internal water pipes.
- Reduction measures: initiatives to reduce consumption and promote water reuse.
- Cost: Comparative analysis of price per $m^3$ between plants.

For their part, in accordance with the Water Framework Directive (Directive 2000/60/EC), the Member States, through the competent bodies, grant the terms for environmental authorisations which take into account the pressures to which the water bodies are subject in addition to the characterisation of the status of water bodies (ecological status and chemical status). Moreover, on the occasion of the transposition of the Directive, changes were made to the revised text of the Water Act, which led to the adaptation of the Regulation of the Spanish Hydrological Plan, which, together with the River Basin Hydrological Plans, establishes the criteria for maintaining the ecological flows of rivers and other bodies of water. The terms of the environmental authorisations together with the criteria of the Water Framework Directive are taken into account in the company's water risk assessment. A clear example is the water risk analysis of the Pontevedra bio-factory, which is exposed to a lack of water availability in times of drought to guarantee the maintenance of the ecological flow rate.

In assessing water-related risks, Ence takes into account all the communications and consultations received from the affected communities, as well as the opinions expressed by them through the communication channels with Ence or through external media.

### Opportunities

The efficient management of water resources represents a key opportunity for Ence that can contribute to the stability of its production. In this sense, the implementation of practices such as water reuse and recycling not only reinforces the Group's environmental commitment, but also guarantees the availability of this key resource for its operations, even in water stress scenarios.

### Cross-cutting mitigation measures

Water risks are managed within the Group's risk management system (RMS), assigned to responsible parties and assessed according to the established methodology. The main mitigation measures are:

- **Reduce the dependence** of facilities on natural water resources: Effluents are conditioned to be reincorporated into the production process, reducing water withdrawal from natural sources. In Pontevedra, work is under way to utilise treated waste water from the nearby municipal WWTP.
- **Reduce water consumption** in processes: In both bio-factories and power plants, specific water consumption is optimised by looking for less water-intensive alternatives.
- **Promote business models that are less dependent on water**: For example, the recycled pulp plant in As Pontes will have a 53% lower specific consumption than virgin fibre plants. In addition, a sustainable packaging plant with moulded cellulose is being promoted, which will recirculate almost all the water used, and in the case of the design of the new bio-fertiliser and bio-methane plants, they are designed to consume no water in the process.

## 2.4.2 Environmental policy

Ence has a Corporate Environmental Policy approved by the Board of Directors, which includes the company's commitment to environmental protection in all its operations. This Framework Policy sets out a number of policy principles that guide environmental management, including the application of the mitigation hierarchy principle (avoid, minimise, restore and ultimately compensate for impacts) and the analysis of impacts along the value chain.

Among the priority lines of action, the Policy includes the **protection and responsible use of water resources**. In this line, the following principles of action are established: protect aquatic ecosystems and groundwater through adequate treatment of effluents; reduce consumption in areas of water stress with efficiency and reuse measures; incorporate water recovered from other sources to reduce direct abstraction; design products with a smaller water footprint; and assess the impacts on water in new facilities to prioritise the options with the least impact. All of this is articulated with defined roles and monitoring mechanisms.

## 2.4.3 Objectives, actions and resources

### Objectives

As mentioned above, securing supply, increasing resilience and reducing water consumption are strategic objectives for Ence, which have been included in its 2024-2028 Sustainability Master Plan (see section *1.4 Sustainability management*).

In this line, Ence has defined the following **targets for reducing** specific water consumption, both for its bio-factories (main consumers) and for the power plants in Huelva, Puertollano, Mérida and La Loma. The objectives are detailed below:

| IRO | Objective | Type of objective | Business | 2025 Objective | 2025 Performance | 2026 Objective | 2028 Objective |
|---|---|---|---|---|---|---|---|
| I1 / I2 / I3<br>R1 / R2 / R3 | O1: Reduction of specific water consumption | Voluntary | Cellulose (Pontevedra) | 24.5 m3/tAD | 24.6 m3/tAD | 24.5 m3/tAD | 24 m3/tAD |
| | | Voluntary | Cellulose (Navia) | 26.5 m3/tAD (in the second semester) | 26.4 m3/tAD<br>(in the second semester) | 26.5 m3/tAD | |
| | | Voluntary | Power Plants | N/A | N/A | N/A | HU: -8% m3/MWh vs 2022<br>PU: -4% m3/MWh vs 2022<br>ME: -6% m3/MWh vs 2022<br>LO: -2% m3/MWh vs 2022 |
| | | Voluntary | Power Plants | Compliance with water management measures foreseen in the Water Map Action Plan. | Completed | N/A | N/A |

These objectives are voluntary and have been defined as part of the Sustainability Master Plan in which the different Ence departments responsible for achieving them took part as stakeholders. The definition took into account the historical data of the facilities as well as the analysis of the industry.

### Actions and resources

In order to achieve the proposed objectives and increase the resilience of the facilities and reduce dependence on supplies from natural sources, Ence plans to undertake the following actions:

| Plant | Action | Description of the action |
|---|---|---|
| Pontevedra Bio-factory | Implementation of initiatives to reduce specific consumption by optimising the efficiency of production processes and the recirculation and treatment of effluent from both the facility's waste water treatment plant (IWWTP) and the municipal wastewater treatment plant (UWWTP). | At the Pontevedra bio-factory, a pioneering solution has been developed to reduce dependence on the Lérez River in the face of drought episodes that are increasingly recurring due to climate change. The proposed solution involves subjecting the plant's effluents to reverse osmosis treatment in order to regenerate them and incorporate them into the industrial process. Water is recovered and recirculated from the industrial water treatment plant (IWWTP) and work continues on permitting and engineering for the project to regenerate waste water from the Placeres UWWTP, close to the bio-factory. |
| Navia Bio-factory | Improvement of water collection, storage and conduction facilities to the plant | In Navia, the project consists of improvements to the water collection and conduction facilities from the collection point to the bio-factory, the construction of water storage tanks in the plant (for use in the event of unavailability of the water resource), and improvements in the efficiency of the processes to achieve the specific consumption target of 24 m3/tAD in 2028. Thanks to the consumption reduction measures implemented, by the end of 2025, the Navia bio-factory had achieved its best historical average consumption value (26.8 m3/tAD), with a reduction in specific consumption of 21% in recent years (vs. 2021), reaching monthly consumption values of around 24 m3/tAD at the end of the year. |
| Huelva Complex | Measures for the improvement of efficiency, optimisation and reduction of water consumption | In 2025, several actions have been undertaken to reduce the consumption of water resources and optimise processes. These include the installation of an ultrafiltration project at HU46 to reduce the rejection flow. In addition, improvements have been implemented in flow control, coagulant dosing and pH adjustment in treatment plants, optimising salt precipitation and reducing rejection. |
| La Loma | Reduction of water consumption | A humidification project has been implemented to reduce evaporation losses and, consequently, water consumption. In addition, a reverse osmosis reject recovery system has been installed to reduce dependence on water resources by reducing the initial reject volume by 50%. |
| Puertollano | Improving water quality and reducing consumption | Kidney filters are being used to remove suspended particulate matter from the water to improve water quality and reduce water consumption by increasing the number of cycles in cooling towers. |
| Merida | Reduction of water consumption | Reduced consumption thanks to the use of water from rain/emergency ponds. A backing point pump has also been installed to ensure that the correct volume of water enters the plant. In addition, the possibility of piping water from the effluent treatment plant for filter washing, which is already recirculated to the raw water tank, is still being studied. |

Ence has a **specific Water Cycle Department** which drives the reduction of the water footprint of the pulp business (bio-factories and associated infrastructures) through the continuous improvement of processes, segregation, treatment and recirculation of flows, as well as the development of projects for the regeneration of water from WWTPs, brackish water treatment and storage solutions. It also leads the optimisation of catchment, pumping and transport infrastructures, managing the required engineering, permits and authorisations. This department identifies and applies the best available practices and technologies, integrating TQM dynamics in the management of the water cycle.

### Earmarked resources

In 2025, the total investment (Capex) related to Water Resources has amounted to over €8.5 million.

97% of the investment has been focused on the pulp business, the activity of which is more dependent on water resources. At Nincreasing salinity, as well as measures to reuse/reduce water consumption. Thanks to these measures, in 2025, Navia has broken its historical record by reaching its lowest average specific water consumption (26.8 $m^3$/tAD) reaching, at the end of the year, values close to 24 $m^3$/tAD).. At Pontevedra, the investment made in improvements to the reverse osmosis recirculation system, as well as other investments related to the start-up of the IWWTP tests and the blocking of rejects from the WWTP, are particularly noteworthy.

avia, the most noteworthy investments include actions to improve raw water abstraction as part of the plan to reduce its exposure to climate risk due to The energy business and assets have concentrated the rest of the investment with actions in the Huelva plant as well as the reform of the irrigation water supply network in the nurseries of the same facility.

## 2.4.4 Metrics

### Total water consumption

#### Total water consumption by type of source (m³)

| Period | 2023 | 2024 | 2025 |
|---|---|---|---|
| Surface water | 32,513,300 | 29,748,900 | 28,517,625 |
| Groundwater | 1,200 | 1,551 | 31,262 |
| Reused water | 604,900 | 1,038,300 | 1,238,047 |
| Municipal supply | 85,800 | 66,600 | 37,668 |
| **Total** | **33,204,000** | **30,855,351** | **29,824,602** |

Compared to 2024, Ence's total water consumption has been reduced by 3%. By source, the greatest reduction has been seen in municipal supply, mainly due to the leakage correction plan, which in Huelva has led to a significant reduction in consumption. On the other hand, groundwater consumption rises in 2025 on the one hand, due to the inclusion of the consumption of the new bio-methane plant La Galera; and on the other hand, due to the operation in 2025 of the Enemansa power plant, which had been inoperative during 2024.

Water consumption data is extracted from direct measurements from measuring equipment (e.g. flow meters and water meters) or from water supply bills. Measuring equipment is subject to calibration plans guaranteeing the accuracy and reliability of the data.

#### Water intensity (thousands of m³/€M) (1)

| Period | 2023 | 2024 | 2025 |
|---|---|---|---|
| Water consumption ratio | 40.02 | 35.45 | 39.91 |

(1) Water consumption ratio = Total water consumption (thousands of m³) / revenue (€M). The net income figure may be found in the Consolidated Annual Accounts under section "9. Ordinary income and other operating income".

The ratio of water intensity to turnover is not a representative KPI for Ence's activity, as there is no direct correlation between water consumption and the company's revenue, which is highly dependent on the price of pulp, which varies cyclically, and the price of electricity markets. From an operational point of view, the pulp business is the most water intensive, with a correlation between pulp production volume and water consumption.

#### Water intensity (m³/tAd)

| Period | 2023 | 2024 | 2025 |
|---|---|---|---|
| Navia | 27.6 | 28 | 26.8 |
| Pontevedra | 26 | 23.8 | 24.6 |

In 2025, the Navia bio-factory has achieved its best historical value of average annual consumption (26.8 m³/tad), with a reduction in specific consumption of 21% in recent years (vs 2021), and reaching monthly consumption values of around 24 m³/tAD at the end of the year. This milestone has been achieved thanks to the implementation of an ambitious operational improvement plan to reduce water consumption, the main initiatives being the closure of circuits, the reuse of condensate, the recovery of water from backwashing and the reuse of water from scrubbers, among others.

### Water consumption in water-stressed areas

According to WRI's water stress risk level analysis, only four facilities are in areas classified as having high or very high water stress:

#### Water consumption in areas of high or very high water stress (m³)

| Period | 2023 | 2024 | 2025 |
|---|---|---|---|
| Enemansa (1) | 300 | 1,600 | 23,634 |
| Huelva | 3,550,100 | 3,927,900 | 3,968,749 |
| La Loma | 33,800 | 35,000 | 30,444 |
| Lucena | 320,200 | 400,800 | 453,257 |
| **Total** | **3,904,400** | **4,365,300** | **4,476,084** |

(1) Enemansa had no activity in 2023 or 2024.

### Stored water capacity

The water capacity stored at Ence's facilities is 39,893 m³.[20] This water is stored in tanks and reservoirs to cover or support the water usage needs of the facilities. The process water tanks and reservoirs are fitted with filling level sensors which are filled automatically following a programmed pattern or by the control system and ensure that they are always 100% full, so that stored water is available at all times.

## 2.5 Biodiversity (E4)

Ence's business model depends on natural capital and the **ecosystem services** that underpin the production of wood and biomass, such as biodiversity, habitat conservation, water regulation, pollination and erosion control. This dependence is reflected in the use of forest species (mainly Eucalyptus), agricultural biomass (e.g. olive) and cork in meadows and cork oak forests.

Aware of this relationship, Ence analyses physical and transitional risks affecting agroforestry systems, especially in the medium and long term, given the cycle of forest crops (10-15 years). The main risks are linked to production variability and pests and diseases aggravated by climate change. To strengthen resilience, the company implements measures such as its forestry R&D programme, active for more than ten years, aimed at developing plant material that is better adapted to new climatic conditions, pests and diseases. For more details on the scenarios, horizons and assumptions used for the analysis of these risks, as well as the resilience strategy defined, please refer to section *2.5.1 Impacts, risks and opportunities* of this report.

In addition to the above, Ence understands that sustainability in any action in the natural environment necessarily involves an appropriate approach to the protection and **active management of biodiversity**. The impacts on ecosystems and biodiversity not only jeopardise the ecosystem services that ensure the long-term sustainability of the Group's activity, but also entail other environmental, economic and social risks that make the preservation of ecosystems and biodiversity a strategic priority for Ence. Therefore, the company identifies the related impacts and risks and applies measures to ensure its protection in the development of its activities, having a specific biodiversity plan in its forest assets to manage this aspect and achieve not only to preserve biodiversity, but also to improve it.

20. Waste water storage tanks are excluded, as well as dams or reservoirs from which water is supplied to the facilities.

## 2.5.1 Impacts, risks and opportunities

Through the update of the double materiality analysis described in section *1.4.4 Double materiality analysis* above, a specific analysis of the identification and assessment of biodiversity-related IROs was carried out. Consultations were also carried out both with the Group's in-house staff and with other external stakeholders.

### 2.5.1.1 IMPACTS

Ence is aware that its forestry and industrial activities could have a negative impact on biodiversity if they are not managed properly. In its analysis of the impacts, risks and opportunities related to biodiversity, Ence takes into account that the loss of biodiversity is closely linked to other factors that must be properly managed, such as the presence of invasive species; the negative impacts of climate change, which in many cases exceed the adaptive capacity of ecosystems; the direct exploitation of productive land and its potential direct impact on biodiversity; or pollution from inadequate waste management during forestry activities[21]. The analysis also takes into account the potential impacts of Ence's activity on the status of species and ecosystems, as well as its dependence on ecosystem services. Ence also carries out the impact and risk assessment in line with the first three phases of the LEAP (*Locate, Evaluate, Assess and Prepare*) approach:

- **Phase 1 (Locate):** location of relevant sites in terms of their relationship with biodiversity and ecosystems. To locate the relevant sites, Ence has a detailed list of heritage locations with their respective characteristics, both in the production areas (with species, age and material) and in the protection areas (Conservation Area Network, which identifies the ecosystems that are present and their state of conservation). In the former, activities with potential impacts are covered by the impact and risk management model described in *2.5.1.2. Risks and opportunities*. In the latter, all activities are aimed at the protection, conservation and promotion of the stands. There is also a list of locations of productive areas for standing purchases, even if they are not part of Ence's estate. For each of these locations, Ence has information on their protection level (whether they are located in a Protected Natural Area with some form of regional, national or European protection) and has a list of the silvicultural and forestry operations carried out there (both productive and non-productive).

- ***Phase 2 (Evaluate):*** assessment of potential and actual impacts and dependencies on biodiversity and ecosystems. To assess impacts and dependencies, Ence identifies the processes and activities of its operations that can interfere with biodiversity and ecosystems.

  As detailed below, the main potential impacts are identified in two types of events: physical risks (acute and chronic) and transitional risks. Acute physical risks include extreme weather events and chronic risks include the long-term consequences of climate change and other factors such as declining pollinator populations. Transition risks include regulatory, technological, market, market and reputational risks associated with wood and biomass harvesting and production, and reforestation activities. The evaluation mechanisms are detailed in the section on Cross-cutting mitigation measures. Impacts can also occur in industrial operations, which are analysed in environmental impact assessments prior to the commissioning of facilities.

- Phase 3 (Assess): assessment of material risks and opportunities For risk assessment, Ence identifies two types of events: physical risks (acute and chronic) and transition risks. Acute physical risks include extreme weather events and chronic risks include the long-term consequences of climate change and other factors such as declining pollinator populations. In terms of transition risks, regulatory, technological, market and reputational risks are taken into account.

Taking all of the above into account, at Group level, some potential negative impacts have been identified that require attention and active management to avoid or minimise their negative effects:

| Impact | Description of the risk | Mitigation measures |
|---|---|---|
| **I1: Degradation of ecosystems as a consequence of potentially inappropriate forest management. (P / OW, VC)** | Potential soil degradation, loss of biodiversity and reduced water availability (in quantity and quality) as a result of hypothetical inadequate forest management in the plantations and woodlands managed by Ence, and throughout its value chain, in the woodlands managed by third-party suppliers of the company. | To avoid this impact, Ence applies a management model for biodiversity and other ecosystem services in its forest management, ensuring the protection of the Conservation Area Network (CAN) and other natural values in its woodlands and defining sustainable forest management practices. Specifically, Ence draws up an impact analysis which is included in the corresponding Technical Reforestation Plans (TRPs) and Technical Harvesting Plans (THPs). A guided application is also available that allows the manager to identify on the ground potential impacts of the planned actions. Aspects of potential impact on biodiversity are considered in the course of the silvicultural trajectory and are monitored by means of an inspection plan. Ence also promotes sustainable forest certification (FSC® and PEFC) both in its own assets and in the wood it purchases from third parties to ensure that forest management is carried out responsibly, mitigating these impacts. |
| **I2: Degradation of marine habitats by discharges into seawater. (P / OO)** | Potential degradation of marine habitats caused by effluents from the cellulose production process at Ence's bio-factories. These discharges, if not properly treated and if they exceed the quality limits set by the relevant administrations, could alter water quality and negatively impact marine and coastal ecosystems. | Ence applies BATs in its wastewater treatment and purification systems and monitors effluent quality parameters to ensure that they are below the limits set in its integrated environmental authorisations, thereby ensuring that these habitats are not affected. For more information on effluent treatment, see section *2.3 Pollution*. |
| **I3: Occupation and land use of industrial facilities. (C / OO, VC)** | As with any industrial facility, Ence's plants cause land occupation which, if not properly managed, could lead to land transformation. | Ence applies urban planning and environmental impact assessment regulations before setting up an industrial facility and tries to take advantage of obsolete industrial sites to give them a new life and avoid occupying new land. In this sense, the last biomass plant built by the company in Puertollano was installed on the site of a former gas-fired power station, and the recovered cellulose plant it is developing in As Pontes will occupy part of the site of a former coal-fired power station. |

C: Current; P: Potential / OO: Own Operations; VC: Value Chain

With regard to potential impacts on **indigenous and/or local communities**, which are common in the forestry industry, it should be noted that there are no communities within the perimeter of the operations carried out by Ence's forestry management. In the case of neighbouring communities, the most relevant operation for them is the

21. With regard to land use change, Ence does not undertake forestry activities that involve a change in land use. All operation areas are classified as rustic-forest use and as such managed under the guidelines of the competent forestry administrations. There is also no activity associated with changes in hydrological activity. When operations are carried out beyond the public domain area, they are undertaken in accordance with specific permits that include conditions on actions. In the case of watercourses that are not under public management, Ence does not undertake any action that involves changing the flow or altering their basic conditions. Even though no permits are required from the administration, the company manages them as in the case of publicly managed watercourses and bodies of water. Ence's forestry activity does also not involve surface or underground water abstraction.

execution of reforestation and forest harvesting operations. Every year, Ence posts on its website the list of operations to be carried out (land preparation, new plantations and final felling) in order to learn about its assessment in this respect.

Ence has started to implement an improved stakeholder consultation procedure in 2025, which will be reinforced in 2026 by establishing new communication channels through the website. In the case of standing purchases and supplies, it is the responsibility of the groups representing the ownership to make such communications, however, the new procedure takes this situation into account. In addition, Ence's annual Management Plan summary, which is posted on its website, provides its stakeholders with information on the characteristics of its operations and their systemic risks, as well as the way in which they are addressed. Ence also provides an additional channel for interaction with the community, the Social Plan, which enables individuals, entities and associations in the surrounding area to develop projects of economic, social or environmental interest based on their own knowledge and experience. In cases where it is considered that they can provide Ence with relevant knowledge capital, the promoters of these projects are contacted to analyse the possibility of furthering the developed experiences and incorporating them into Ence's lines of action in terms of biodiversity and sustainable forest management.

The concept of **indigenous peoples** does not apply in Ence's forestry environment, as the company carries out its activities in Spain, where there are no indigenous peoples according to the definitions established by the UN.

Ence's activity can also have positive impacts on biodiversity, such as **reducing forest fires as a result of active forest management** in the company's woodlands and promoting measures to prevent abandonment in other owners' woodlands. Similarly, policies and plans for the restoration of degraded areas and former plantations, the creation of ecotones in the surroundings of Priority Habitats of Community Interest, or the protection of certain specific groups of species, generate positive impacts.

In addition, Ence's sustainable forest management practices and the protection of the Conservation Area Network promote the **conservation of habitats**, the natural regeneration of ecosystems, and in parallel, the improvement of soil conditions and water availability in the watersheds in which its woodlands are located.

Ence believes that another of the benefits of biodiversity conservation is the **protection of genetic resources** that are key to the resilience of ecosystems and a source of resources for society. In the case of natural stands, the promotion of biodiversity conservation and enhancement strategies contributes to conservation and genetic variability. In the case of eucalyptus cultivation, continuous work is being carried out on to improve the genetic base of the populations, leading to more productive and resistant stands, with greater genetic variability (new species, clones of more adapted varieties). This not only conserves productive stands, maintaining soil cover, soil protection, carbon sequestration and water regulation (and thus the ecosystem), but also improves productivity and thus reduces the need for cultivated area and stress on natural ecosystems elsewhere. The knowledge acquired in the field of forest genetics is accessible to forest owners through the company's plant marketing and landowner advice network.

### 2.5.1.2 RISKS AND OPPORTUNITIES

#### Risks

The main potential risks identified in relation to the impact on biodiversity are as follows:

| Risk | Description of the risk | Mitigation measures |
|---|---|---|
| **R1: Forest management non-compliance - loss of certification Equity** | Potential non-compliance with forestry regulations in Ence's harvesting could result in fines or penalties for the company and the potential withdrawal of sustainable forest management certifications, both in the case of managed forest assets and in the case of harvesting of standing wood, where Ence carries out the felling and transport of the wood. Any potential impact on biodiversity caused by the suppliers Ence contracts for forestry and forest harvesting work, both for its own equity and for its standing purchases, could be detrimental to the company's image. | Ence has an Integrated Forest Management System (IFMS), which articulates the general planning of forest management, ensuring compliance with the Management Policy and guaranteeing that the levels of environmental protection defined by legislation and Ence's internal regulations are maintained, ensuring that not only legal obligations are met, but also the requirements of the FSC® and PEFC sustainable forest management standards. Within the framework of the IFMS (currently under review), the main management tools Ence works with are: management projects, ongoing forest inventory, technical plans prior to harvesting or reforestation, which establish measures to mitigate the environmental impact of the actions, inspections to monitor forestry operations in terms of environmental protection measures and annual monitoring of woodlands to control the state of the stands and factors such as erosion, presence of protected species, health status of the stands, etc.<br>Although the scope of the IFMS is the Forest Heritage, the management techniques and environmental requirements applied to harvesting can be extended to those applied to third party areas harvested by the standing purchases area, where the same technical requirements for action and conservation apply and which are also inspected by company personnel. |
| **R2: Loss of supplier certification** | The impacts that could potentially be generated by owner-managers or service companies in areas supplied by the company could become not only commercial damage (due to product non-conformity) but also reputational damage for the company, as well as the potential loss of its certification (in certified suppliers). | To ensure that the wood and by-products used in Ence's production process comes from reliable sources, Ence defines a series of principles of action that comply with Spanish regulations (RD 1088/2015 on wood legality) and international regulations (EUTR Regulation 995/2010 on due diligence and Regulation 2023/1115 on combating deforestation and degradation). Furthermore, in its Purchasing Policy, Ence is committed to prioritising and promoting the consumption of wood from certified forests under the FSC® and PEFC certification schemes, thus guaranteeing that Ence's suppliers comply with sustainable forest management criteria. Ence also has a supply chain supervision system that consists of supplier approval (including a supplier risk analysis) and a procedure of audits (both external and internal) and inspections to identify possible risks and potential non-compliance by suppliers. |

Ence also carries out an ongoing analysis of potential regulatory changes that could lead to changes or additional biodiversity conservation requirements both at its facilities and in forest areas that could pose risks (e.g. classification of new protection areas, inclusion of new species, catalogues or protection lists, EUDR, etc.). The risk management process related to biodiversity is integrated into the company's global risk management process described in section *1.4.6.6 ESG risk identification, assessment and management process* and the risks stated here are included in Ence's Risk Map.

### Opportunities

As well as these risks, for Ence, the management of biodiversity and ecosystem services, especially in its forestry assets, also represents significant opportunities. On the one hand, the management and **certification of ecosystem services**, such as carbon sinks, represent a business opportunity for Ence through the trading of these credits for companies that require them in their emissions offset plans (see section *1.3.1. Strategic Framework – Pulp business).* Ence is already working to take advantage of this opportunity and has set targets for the registration of forest sink projects in several voluntary markets (see section *2.5.3.1 Biodiversity Plan – Core concept 4*).

Social demands and regulatory requirements in terms of biodiversity protection or nature restoration constitute another opportunity for the company, insofar as a series of actions are defined which, once identified, measured and assessed, can be used to certify biodiversity credits and the like, for which there is an incipient market. Ence already has a certified surface area and is working on a plan to develop the certification of ecosystem services in its Forest Heritage.

On the other hand, active management of the biodiversity of eucalyptus species and similar genera can help Ence **diversify clones, species or wood hybrids to increase productivity**, improve resilience to climate change and pests and diseases, and therefore increase efficiency and reduce operating costs. Active management of biodiversity and other ecosystem services both in its own woodlands and throughout its value chain can also improve Ence's reputation, counteracting some of the controversial aspects that damage the image of eucalyptus plantations on the Iberian Peninsula. To take advantage of this opportunity, Ence has been developing its forestry R&D plan for years and has set targets for the marketing of new clones within the framework of the Sustainability Master Plan (see section *1.4.5 2024-2028 Sustainability Master Plan* and annual targets, Core concept 2).

### Cross-cutting mitigation measures

Ence recognises that, if not properly managed, logging activities can have negative impacts on biodiversity, especially in sensitive habitats or in areas that require ecological connectivity between populations. To prevent and manage these risks, the company has developed a set of tools that it systematically applies in its forestry operations, including voluntary principles of sustainable forest management, a manual of good environmental practices, inspection and audit systems, a specific biodiversity plan, and collaboration mechanisms to extend these good practices throughout its supply chain.

The **sustainable forest management principles** that Ence applies in its operations (and promotes among its suppliers and other landowners) aim not only to minimise these potential negative impacts, but also to actively promote the protection of biodiversity by designating conservation areas where no logging takes place and defining areas where logging must be carried out with special precautions. The forest sustainability principles voluntarily defined by the company are:

**Principle 1: Sustainability**
Managed forest resources are an important environmental, social and economic asset that must be passed on to future generations. Its management focuses on maintaining and increasing production capacity and environmental values in the short, medium and long term, through conservation, development, and where appropriate, renewal of managed forest ecosystems.

**Principle 2: Minimising impacts**
Managed ecosystems have production and management constraints that need to be known. All activities are planned with the aim of minimising the environmental impact, compensating for possible negative effects and identifying and implementing environmentally friendly alternatives that contribute to preserving the environment.

**Principle 3: Maintaining diversity**
The forests managed by Ence contain a great diversity of natural, social and cultural elements. The objectives of the actions carried out include the preservation of this diversity, enabling it to evolve naturally and for the Company to harness this knowledge and enhance it.

**Principle 4: Multifunctionality**
The forests managed by Ence contain diverse goods and services that can be used for many purposes. The actions therefore consider active policies for managing the different goods and services of the woodlands, maximising and preserving the environmental, social and cultural benefits of the woodlands, as well as the economic ones.

**Principle 5: Continuous innovation**
Forestry RD&I policies are necessary to promote the Company's continuous adaptation to technical, environmental and social management requirements. Ence constantly searches for innovation in its forest management processes, as a guarantee for continuously improving to achieve social, environmental and economic objectives.

**Principle 6: Forest area**
Ence's forestry activity takes place in the rural environment, in which the Company participates and is involved beyond its activity as owner and manager. Ence applies active forest extension policies aimed at transmitting accumulated knowledge, fostering management agreements, informing its stakeholders and supporting sustainability principles, in the conviction that a technologically managed and trained forest sector is the best way to achieve effective sustainability

**Principle 7: Active participation with stakeholders**
The stakeholders and the community are a necessary and desirable reference for identifying best practices for action. Ence will maintain its efforts to promote, channel and make the most of this relationship, which will result in society having better knowledge of forestry activity and precisely defining its expectations.

**Principle 8: Public commitment**
Ence considers that these Sustainability Principles are only possible with collaboration and effective support from all customers and suppliers. These principles will be disseminated to all stakeholders, and especially to those who have direct responsibility for forest management actions, fostering environmental, social and economic improvements in their actions. Ence particularly values relations with those who incorporate sustainability criteria in their daily activity, in compliance with the company's objectives in this area.

**Principle 9: Forest certification**
Forest certification is an effective tool for promoting sustainability in managing forest areas. Ence works to maintain and extend the certification of its forests and promotes certification of among its suppliers. It also collaborates on initiatives aimed at promoting and developing forest certification, from regulatory and practical perspectives.

Ence complements these principles with **specific commitments**:

- To comply with all the requirements demanded by the FSC® and PEF woodland certification schemes in the managed woodlands that, under its direct or indirect management responsibility, are within the scope of Ence's Forest Certification Group.

- Not to carry out activities contrary to the FSC® Principles and Criteria and PEFC Principles in other managed forest stands outside the scope of the corresponding certifications, ensuring in any case that the management standards are the same in certified and non-certified managed stands.

- Progressively implement FSC® and PEFC Certification in all managed forest stands not included in the initial scope of certification.

- Avoid deforestation: aware of the problem posed by the deforestation of the world's forests and its impact as the main cause of biodiversity loss, Ence is also committed to adopting the necessary measures to prevent it. Thus, as established in its Purchasing Policy, Ence works proactively against deforestation both in stands managed by the company and in those coming from its supplies. Specifically, Ence applies the following principles of action against deforestation:
  - Any supply of wood or forest biomass from private forest areas shall imply the maintenance or increase of the forested area, except in the case of possible restorations of forests coming from non-forested natural states of higher ecological value and previously modified.
  - All Ence's suppliers of wood or forest biomass, whether in the form of standing wood or supplies purchases, must comply with the requirements established by the company to combat deforestation, whether through contractual clauses or approval.
  - Ence undertakes to establish monitoring and control mechanisms to detect practices that promote deforestation throughout its supply chain and, if necessary, to take the appropriate preventive and corrective measures.
  - Ence will not participate in commercial or industrial activities that may involve practices that entail deforestation of natural environments, and undertakes not to consume raw materials obtained through such practices.

Ence also has a manual of **good environmental practices** that sets the basis for training all the company's forestry personnel and its contractors, so as to prevent negative impacts of forestry work. The manual includes good practices for preventing erosion, for the protection of watercourses and natural drainage networks, for the reduction of visual impact and others such as good practices in the prevention of forest fires, the treatment of pests and diseases, the use of phytosanitary products and the correct management of waste. In terms of flora and fauna protection practices, a system for the management of endangered fauna in the company's woodlands is included. Thus, Ence strictly plans forestry activities to avoid or minimise the effect it may have on these species, respecting at all times the regulations in force and the recommendations and/or restrictions established by the competent authorities (for example, the periods in which certain activities cannot be carried out because they coincide with the breeding season of these species, etc.).

In addition, Ence's Integrated Forest Management System (IFMS) establishes a system for monitoring woodlands and operations carried out by operational and sustainability staff through the **assessment of potential environmental impacts** of each action to detect possible negative impacts of forest management on biodiversity and to take the necessary measures to correct them so that they do not recur.

In this sense, for each reforestation and wood harvesting operation (including residual forest biomass), identified as the activities with the greatest potential impact, the technical forestry office and managers assess potential impacts and establishes preventive measures to avoid them. This impact assessment is known to the operations team prior to the start of field work. The impact assessment of operations covers impacts on the main potentially affected ecosystem services: biodiversity, water and soil. The systemic risks of forestry activities considered in the analysis and potential methodology are: on biodiversity (impact on total area, connectivity, specific individuals, quality), soil (possible physical and chemical alterations) and water quantity and quality (through spillage, or physical impact on watercourses or locations). At an ecosystem level, the main formations, categorised by value, have been identified within the CAN.

The forest sustainability team, within the Company's Forest Heritage department, also carries out **internal audits** (every six months) and **inspections** during and after operations (through sampling) to analyse performance and, where necessary, define corrective measures. This procedure is extended to all field operations undertaken by the company according to their scale, intensity and risk, and is implemented in forest harvesting work on third-party land under the standing purchase modality. In the latter case, operations inspections are carried out to verify compliance with the Good Environmental Practices that apply to all the company's forestry operations. There is also collaboration with the certification groups (environmental verifiers of standing purchases) to share inspection information and coordinate them. In the case of supply operations, Ence has no responsibility for them, but it nevertheless undertakes an assessment of each and every one of its suppliers, who are required to guarantee the environmental quality of their operations. Thus, Ence has a list of operations in which there is a potential for negative impacts on biodiversity and ecosystems, both in its own assets (harvesting and reforestation) and in operations on third-party land (harvesting in woodlands of standing wood). With the existing inspection system, an analysis of impacts detected in the undertaken operations is available and all findings are monitored monthly, classified according to their location (list of sites), importance, recurrence, etc. for their management and to identify opportunities for operational improvement. Thus, all the impacts produced within the CAN are identified, as well as the impacts that involve soil degradation, desertification or soil sealing and the operations that may have had an impact on endangered species.

On the other hand, with the implementation of the **Biodiversity Plan** (described in detail in section ***2.5.3.1 Biodiversity Plan***), the risk of being affected by inappropriate forestry practices is reduced, as the implementation of buffers or ecotones in the surroundings of areas with the presence of Priority Habitats of Community Interest and/or threatened/protected species reduces the potential impact. The plan also includes the restoration of degraded areas (marginal eucalyptus groves and areas with invasive exotic species), as well as the riverbanks adjacent to the productive areas.

Regarding the **supply chain**, in a context of growing tension over raw materials in general and wood in particular, Ence's leadership in terms of the management of impacts and risks derived from biodiversity, together with the extension of its own policies throughout the chain, helps its collaborators to align with mandatory directives and strategies that will be demanded of them by administrations and society itself. Thus, Ence manages to make its forestry business model more resilient and competitive, with greater social support, and to strengthen the industry.

Finally, to reduce risks in its activities, and as provided for in the Biodiversity Plan, Ence is working to **train the technical operational team** that supervises forestry and forest harvesting tasks and monitors the environmental performance of the contractors working with the company on these tasks. Moreover, Ence collaborates with the groups managing the certification of the standing areas purchased (which have their own impact prevention plans) to intensify the scope of environmental monitoring of operational work.

This also contributes to reducing the **reputational risk** related to intensive logging, especially of eucalyptus stands, as a proactive and advanced biodiversity performance contributes to changing the image of an area management company focused solely on production, and with respect to environmental stakeholders, the development of specific conservation strategies addresses their main demands. In relation to the Administration, proactivity in the development of actions in line with new European and national policies, as well as scrupulous compliance with the guidelines for the conservation, restoration and promotion of biodiversity, enables a more fluid relationship.

## 2.5.2 Biodiversity Policy

Ence has a Biodiversity Policy approved by the Board in 2024, which reinforces its commitment to the protection and promotion of biodiversity. As the leading private forest manager in Spain, the company establishes in this policy the principles that guide its actions in the management of its forest stands, extending them to its forestry contracts and to the rest of the industry. The Policy defines specific mechanisms for its application in day-to-day operations, as well as the roles and responsibilities of the different governing bodies and areas involved.

The Policy establishes a framework for action that integrates biodiversity conservation into corporate strategy and decision-making, ensuring regulatory compliance and the protection of sensitive areas. It promotes the continuous assessment of impacts (including both environmental impacts and social consequences arising from potential impacts on biodiversity and ecosystems), the application of mitigation measures under a hierarchy of action (avoid, minimise, restore and compensate), and the enhancement of natural environments, especially forest heritage. It also promotes traceability and sustainability in the supply chain, encourages the use of scientific solutions, considers factors such as climate change, land use change or the presence of invasive species in assessments of impacts, risks, dependencies and opportunities related to biodiversity and ecosystems, and reinforces internal awareness to strengthen the organisation's commitment to biodiversity. Furthermore, the Policy includes a firm commitment to avoid deforestation associated with Ence's activities and its supply chain, in line with Ence's commitment to zero net deforestation.

This framework has given rise to the Biodiversity Plan, detailed in section ***2.5.3. Objectives, actions and resources*** of this chapter. The full Policy is available to all Ence stakeholders on the website.

ACCESS MORE INFORMATION
ENCE'S WEBSITE

In addition to the Biodiversity Policy, Ence has other corporate policies approved by the Board of Directors that incorporate commitments linked to the protection of biodiversity and ecosystems. A prime example is the **Purchasing Policy**, which includes a specific section on the principles governing the procurement of wood and biomass.

In it, the company reinforces its commitment to sustainable forest management and establishes clear **traceability criteria** for these materials. This policy also sets out the principles governing relations with suppliers of wood, biomass and agroforestry services, including the mechanisms for controlling, sanctioning and rejecting materials in cases where non-compliance with the law, breaches of Ence's internal regulations or negative impacts on ecosystems by suppliers are detected.

## 2.5.3 Objectives, actions and metrics

To define biodiversity-related actions, Ence follows the following **hierarchy of action**:

1. **Avoid** impacts: impact avoidance in operations with prior impact assessments, with special attention to avoidance of impacts on the Conservation Area Network.

2. **Minimisation**: monitoring of operations to ensure that the criteria established to minimise impacts are met, through the system of inspections and corrective actions.

3. **Restoration**: abandoned exploitation areas, areas with invasive species, recovery of riverbank areas, establishment of buffers.

4. **Compensation:** Ence does not make biodiversity offsets in its own forest stands as it has implemented a policy of not affecting biodiversity. Biodiversity offsets derived from own impacts are not considered, but restoration in case of degradation is. However, Ence values enabling the development of third-party environmental offset projects with instruments such as certified biodiversity credits that may be provided by the company in the future.

To define the actions in this area, Ence has relied on information provided by different sources: public information generated by the Forestry Authorities, expert knowledge from certification bodies and conservation groups, the public position of environmental organisations on eucalyptus plantations, the expert knowledge of the company's technical biodiversity team, support from specialised external consultancies such as Föra and ARCEA and academic institutions such as the University of Huelva (for flora and fauna studies). Moreover, Ence considers the current regulatory context to be very favourable for the development of biodiversity actions (new legislation at different levels - European, state, regional - and a high level of social interest, which act as drivers for the development of business policies in this area).

### 2.5.3.1 BIODIVERSITY PLAN

Ence includes biodiversity protection in its forestry management model, both in the execution of the harvesting work and in the conservation of non-productive stands. In this sense, the approval of the **Biodiversity Plan** in 2024 represented a step forward in terms of conserving the company's natural capital. The Plan constitutes a framework for the protection and promotion of biodiversity within the company's Strategic Plan, and is updated year by year in each of the five core concepts in which it is structured: 4 of them operational, with their respective objectives, actions and monitoring metrics, and a cross-cutting core concept:

| Core concept | Description | Actions | Metrics | 2025 Performance | 2026 Objective |
|---|---|---|---|---|---|
| Core concept 1 - Promoting connectivity | Avoid habitat fragmentation and improve population dynamics by identifying areas of high biodiversity and defining actions to improve connectivity. This makes it possible to combat habitat fragmentation, one of the main risks to biodiversity conservation because it limits the ability of populations to grow, the genetic exchange of individuals and the development of their vital activity. | Conservation actions, restoration of degraded areas between well-preserved habitats, and establishment of ecological corridors. In 2025, Ence has worked on the restoration of degraded areas and the creation of ecotones, as well as on the establishment of a structural and functional connectivity analysis tool to determine the impact of its actions on this concept. The tool establishes the main KPI (structural connectivity index) derived from the actions developed, including restoration. | Integrated Structural Connectivity Index (with a value that can vary between 0 and 1). This is an existing index in the scientific literature and adapted to Ence's woodlands that analyses the level of fragmentation of the habitats that make up the CAN: small and distant areas will give rise to a low index, close to 0, while areas connected to each other and of adequate size will give rise to a high connectivity index, close to 1. | In 2025, the index for Ence's assets as a whole stood at 0.40 (the baseline was 0.28, connectivity level could be improved). | Maintain with the new actions the value reached in 2025, consolidating the surface area with the technical actions, with the focus on reaching a value of 0.33 (medium level of connectivity) in 2028.<br><br>Support on the external (adjacent) surface to develop a functional connectivity system. |
| Core concept 2 - Promoting biodiversity in production areas | Enhance biodiversity in eucalyptus plantations, as they provide significant value in terms of soil protection, food and shelter for fauna, and development of flora in ecotonal areas. | Actions to improve productive forest management and the creation of buffer spaces (ecotones) between productive areas and conservation areas. It has been decided to act in the creation of ecotones and transition areas to reduce the pressure derived from productive activities in the sensitive areas of the CAN, as the establishment of ecotones in transition areas around the most sensitive areas of the CAN aims to prevent forestry operations from directly impacting on the conservation area, as an undesired effect of the operations. Reducing this risk ensures the conservation of the identified natural capital. | Area (ha) of ecotones or buffer spaces, which are setbacks of plantations after felling to create transitional spaces between productive areas and conservation areas. Ecotones will be established by prioritising standard ecotones (5 to 10 metres around HICP and stands with protected and/or threatened species of at least 1 ha), followed by riparian ecotones (5 m from the easement in watercourses of more than 2 metres, or from the watercourse in narrower widths), and finally, complementary ecotones (5 metres in other cases of the CAN of areas of at least 5 ha in the south and 2 in the north) | By 2025, 2.28 ha of ecotones have been created. | The annual target (2024-2028) is to establish at least 9.24 ha of ecotones. |
| Core concept 3 - Promotion of biodiversity in the Conservation Area Network (CAN). | Focused on the management of indigenous formations within Ence's forest estate, this line focuses on the design and application of specific management plans (silvicultural itineraries) for the different levels of conservation: strict protection areas, areas of high conservation value, protected natural areas, etc. | These management plans will include actions to categorise conservation areas and restoration actions to promote the health of the ecosystem. The restoration actions undertaken by Ence include the restoration of areas affected by forest fires (cutting and removal of burnt wood, pruning of burnt trees, protection of regenerated shoots from herbivores and planting and densification of areas where no regrowth has occurred). In areas where fires have not occurred, the main restoration work consists of the control and elimination of invasive species, the restoration of areas affected by diseases and pests, actions to prevent or mitigate erosion problems and loss of soil structure, and the elimination of eucalyptus trees in areas devoted to the protection of ecosystems. | Restored area (ha), considering as restoration the elimination and restoration of marginal eucalyptus trees, actions for the elimination of invasive species (either in productive areas or in CAN), elimination of eucalyptus trees in riverside areas and other areas where their presence is not appropriate and any other area where restoration actions have been carried out. | In 2025, restoration work was undertaken on 349.27 ha. | The annual objective (2024-2028) for this indicator is to restore at least 254 ha. |
| | | | % of CAN surface area in Ence's forestry assets. For the calculation of the CAN area, the current area, the restored areas, the new ecotones and the new conservation area entries are taken into account in the acquisition of new woodlands for estate management. The indicator reflects the conservation of natural capital in absolute terms and is also key to forest certification. | At the end of 2025, the % of surface area devoted to conservation in Ence's assets was 21%. | The annual objective (2024-2028) for this indicator is to maintain at least 24.36% of the CAN in the south estate and at least 11.50% in the north estate<br><br>By the end of 2025 the figures are 24.6% and 12%, respectively. |

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|---|---|---|---|---|---|
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| Core concept 4 - Promoting certification of ecosystem services and analysis of new methodologies | In this line, the certification of Ecosystem Services (carbon, biodiversity, soil or water protection) will be promoted and participation in voluntary schemes that enable providing value through these certifications (e.g. voluntary carbon markets) will be encouraged. New methodologies will also be developed to enhance the natural capital of Ence's estate, in collaboration with research centres, public administrations and other stakeholders, such as NGOs and landowners' associations. | The actions are divided into two blocks: on the one hand, the development of reforestation/improvements in forest management projects in Ence's heritage woodlands for their registration in the different voluntary schemes and obtaining compensation credits for their marketing, and on the other, the analysis and development of new methodologies for the enhancement of the ecosystem services provided by Ence's woodlands, both in terms of biodiversity conservation and other aspects (water, soil, etc.). | Area of carbon sinks registered in voluntary schemes (ha): this includes all projects carried out in Ence's heritage woodlands that have been registered in voluntary carbon credit schemes or markets, such as the scheme promoted by the Spanish Climate Change Office or other international schemes such as VERRA. Ence also has more than 2,100 ha with FSC® certification in the Biodiversity Ecosystem Service (with licence code FSC®-C099970), demonstrating the company's commitment to improving the environment, promoting sustainability and developing the environment through the forests it manages. These are the Conservation Areas located in the Los Rasos (Huelva), Cernadas (A Coruña), Aracena (Huelva) and Santarandel (A Coruña) woodlands. | In 2025, Ence reached 4.315 ha registered in voluntary offset schemes (with a total of 333,926 tCO2ee generated planned for the end of the project duration period). | The target set for 2026 is to add 397 new registered ha and to tackle a new biodiversity certification project. |
| Core concept 5 (Cross-cutting) Internal and external communication | The objective of this core concept is to create a culture of respect for biodiversity, compatible with wood harvesting, to provide the forestry operational areas with the necessary knowledge on biodiversity management, to value the biodiversity present in the company's assets and to make Ence a benchmark in nature protection in the industry, transferring its know-how to other forest owners.<br>In 2025, intensive work has been carried out with the operations departments to transmit the management elements associated with sustainability, and to create new tools to perfect them, such as an application for pre-assessing impacts in the field before undertaking operations, the implementation of a functional connectivity analysis tool (currently in the testing phase), and the preparation of informative videos on the main activities being developed in the area of biodiversity promotion.<br>As part of the external communication and awareness-raising plan, Ence's strategies and objectives have been presented at various events such as working groups of various institutions (MITERD Nature Restoration Plan Working Group), or at specific conferences such as the one organised by AirCO2 and Ence at the Madrid School of Forestry Engineering ("The Value of the Forest, solutions for a new carbon economy"), or the one corresponding to the "Sylvia, the intangible forest of the University of Vigo" project ("Strategy for the certification of ecosystem services in Ence's stands"). Work has also been carried out to completely redesign the forestry sustainability section of the company's website to improve access to the company's forestry sustainability work for the general public. | | | | |

In the framework of the deployment of the biodiversity plan, **other initiatives** have also been developed, such as:

- Improvement of the procedure for environmental impacts in operations (including a field app).
- Improved stakeholder consultation procedure, expected to be approved in early 2026.
- Restoration and afforestation strategy, with a special focus on riverbanks (in line with the European target of restoring at least 25,000 km of riverbanks by 2030).
- Strategy for the reduction of fertiliser use: through a net neutral balance system, based on fertilising what is strictly necessary and can be assimilated by the plant. The methodology involves sampling all the cantons to be planted in both the north and south, coordinating the areas of Heritage and R&D. The latter is responsible for coordinating the analysis of soil samples and analysing them with the support of external experts, making fertilisation recommendations for each canton, both for initial and maintenance fertilisation. Such a strategy is based on nutrient balance, ensuring the plant's needs without compromising soil availability. The goal is to replenish the necessary withdrawals in each canton according to the expected growth in each case.
- General wildlife management strategy with specific developments for pollinators, bats, raptors and insectivores.
- Development of the Ecosystem Services Plan.

## Aspects covered in the preparation of the Biodiversity Plan

**Ecological thresholds**

When establishing these objectives, a qualitative approach has been chosen, based on variables such as the presence or not of characteristic species, the presence of habitats identified in Directive 92/43/EEC, focal species, etc. These are the determining criteria for identifying an area as a conservation area (and integrating it into the RAC) or as a singular element to be conserved (in the case of specific elements within the productive area). This work, already undertaken on flora, which forms the basis of habitat characterisation and biodiversity objectives, will be complemented by additional fauna studies and quantitative indicators based on presence and potential indices.

**Timeframe**

Although the Biodiversity Plan has been established with objectives for the 2024-2028 period (in line with the timeframe of the Sustainability Master Plan), due to the nature of forestry activity, the transition from the current situation to the new model that fully integrates the promotion of biodiversity is expected to be completed over a longer period, marked by conditions such as the cutting cycles of the main species cultivated by Ence in its woodlands and the development of restored ecosystems. With this long-term vision, the following intermediate milestones have been set:

- 2026-2028: Technical analysis of the results of the actions for the creation of ecotones and buffers initiated in 2024 and those developed in 2025 and their ecological monitoring plan.
- 2025-2035: Restoration plan for residual and invasive-affected bodies of water after the elimination phase of harmful species.
- 2028: Definition and development of the new Strategic Plan and the new Sustainability Master Plan.

**Regulatory requirements**

The Biodiversity Plan responds to the requirements derived from:

- The voluntary forest certification standards PEFC and FSC®.
- The reference regulations:
  - State and regional forestry laws.
  - Habitats, Birds and Water Directives (and national development).
  - European Forest and Biodiversity Strategies.
  - Nature Restoration Directive.
  - Deforestation Regulation (EUDR).

**Stakeholder engagement**

This process has taken into account the priorities of stakeholders, especially environmental organisations that define forest certification schemes such as FSC® or PEFC. The external involvement of various stakeholders is also considered necessary for its deployment:

- NGOs: Through specific partnership agreements for the definition of strategies and specific actions. In 2025, the collaboration with the FAPAS organisation has continued, enabling the placement of three nests to be placed on fibreglass poles and several nest boxes for nocturnal birds of prey by 2025, as part of ENCE's bird of prey strategy, and even the implementation of actions to promote populations of emblematic protected species such as the brown bear or families of animals with special relevance for biodiversity, such as bats or birds of prey.
- Collaborators (owners and suppliers): Through agreements for the development of biodiversity protection policies in the supply chain, coordinated with those of Ence.
- Society at large: By opening up more effective channels of communication and participation.

Ence also collaborates with other stakeholders, such as universities and research centres such as the University of Huelva for the development of its flora and fauna studies. Entities such as Arcea Xestión de Recursos Naturais, a consultancy firm specialising in environment and biodiversity management based in Vigo (Pontevedra), also participate in these studies. Ence has made progress in developing its own biodiversity analysis capabilities by incorporating technical staff trained in biology and developing its own species photo-trapping work in areas considered to be of special relevance as ecological corridors.

### 2.5.3.2 OTHER OBJECTIVES AND METRICS

For biodiversity management, as well as the objectives established in the company's Biodiversity Plan, Ence defines additional objectives related to biodiversity conservation; metrics linked to the certification of sustainable agroforestry management and forest estate characterisation metrics.

1. Metrics related to the sustainable forest management certification that Ence applies to its estate and requires in its wood supply and the certification of the sustainability of the biomass that Ence uses in its operations.

| Line of action | Objective | 2025 Objective | 2025 Performance | 2026 Objective |
|---|---|---|---|---|
| Increase the level of certification | Percentage of FSC® and/or PEFC® certified wood | >75% | 76.70% | >78% |
| | Increase the area of FSC® and/or PEFC-certified estate in relation to the total certifiable area | 90.76% | 88.50% | >90% |
| | Percentage of certified biomass per plant | >90% | >90% | >90% |

2. **Metrics related to the characteristics and conservation status** of forest stands, such as the number of protected species of flora and fauna. These indicators enable the company to identify areas that, due to their natural values, will be prioritised for conservation. In these area, an inventory, characterisation and assessment of the conservation status of the different plant communities identified and their correspondence with the Habitats of Community Interest (HIC) has been carried out. These studies have enabled the company to identify High Conservation Values (HCVs) in these areas due to their biological biodiversity, their landscape value, the presence of rare or threatened ecosystems, their capacity to provide basic environmental benefits, and their contribution to satisfying the basic needs of local communities. No specific annual targets are defined for these metrics.

| Line of action | Metric | 2025 Performance |
|---|---|---|
| Improving knowledge of the biodiversity values of Ence's Heritage woodlands | Flora surveys and number of protected flora species | Since the start of the flora surveys in 2011, a cumulative total of 58,419 hectares has been analysed, equivalent to 89.0% of the managed area. This work has made it possible to identify habitats of community interest and other representative formations, assessing their conservation status and making an inventory of the plant species present. The protected species included in the different official catalogues have also been identified. These studies also incorporate information on the potential fauna associated with the habitats and plant communities inventoried. As a result, the presence of 24 species of flora with some kind of protection regime in the woodlands managed by Ence has been confirmed.<br><br>The company also has wildlife studies. There is a study of potential fauna covering all heritage woodlands. In addition to this comprehensive study of potential fauna, a plan was initiated in 2022 to carry out fauna studies in a selection of woodlands which, due to their characteristics, represent a representative sample of the woodlands that make up ENCE's assets. Ence works with the specialised consultancy ARCEA to carry out these studies, which include field inventories that provide data on the real presence of species sighted or identified by photo-trapping. In 2025, fauna surveys have been carried out on 33 Heritage woodlands, covering a total area of 5,258 hectares. This brings the cumulative area analysed for fauna since 2022 with data on the actual presence of vertebrate populations to 13,318 hectares, which represents 20.3% of the total area of the woodlands managed by Ence. Overall, 189 species of fauna have been identified as having some level of protection in the woodlands. |
| | Wildlife surveys and number of protected wildlife species | |

The complete list of protected species present in Ence's woodlands may be consulted in *Appendix III Environmental and social indicators - Protected flora and fauna*

**Management area in protected natural areas**

Ence's forestry assets include woodlands (totally or partially) located in a number of protected natural areas. In these cases, the protection of natural values in general and biodiversity in particular is of special importance, and the company implements forest management in these woodlands accordingly.

Ence has a comprehensive categorisation of its Conservation Area Network, explaining the different categories and highlighting those of greatest relevance, such as Habitats of Community Interest and Priority Habitats of Community Interest, the surface area of which amounted to 9,788 ha in 2025. None of them are subject to productive forestry operations, only conservation. As there are no production activities, the main risks to be addressed in these areas are accidental damage due to operations in nearby production areas. To mitigate these risks, administrative permits regulate the operations undertaken in Protected Natural Spaces, but Ence also implements additional measures to prevent them. In the case of standing purchases, the effect on them will be determined by the risk procedure and coordination with the certification groups, and in the case of operations undertaken by suppliers, environmental control is carried out by means of approval.

In the **north of the Iberian Peninsula**, Ence manages woodlands in the protected areas of Costa da Morte, Serra do Xistral, Río Tea and Río Lérez in Galicia, Cuenca del Esva in Asturias and Parque Natural de Oyambre in Cantabria (Natura 2000 Network sites). The habitats of community interest that Ence manages in these areas range from oak woodlands and riparian forests to wet heaths and peat bogs.

In the **south of the Iberian Peninsula**, Ence manages woodlands in the natural parks of Sierra de Aracena y Picos de Aroche, Peñas de Aroche and Sierra Pelada and Rivera del Aserrador, in the Natura 2000 Network. The ecosystems present in these areas include cork oak groves, alder groves and bramble-oak groves, and the importance of these habitats can be highlighted due to their surface area and favourable conservation.

The comprehensive list of the woodlands managed by Ence located in protected natural areas may be consulted in ***Appendix III - Environmental and social indicators – Protected woodlands***

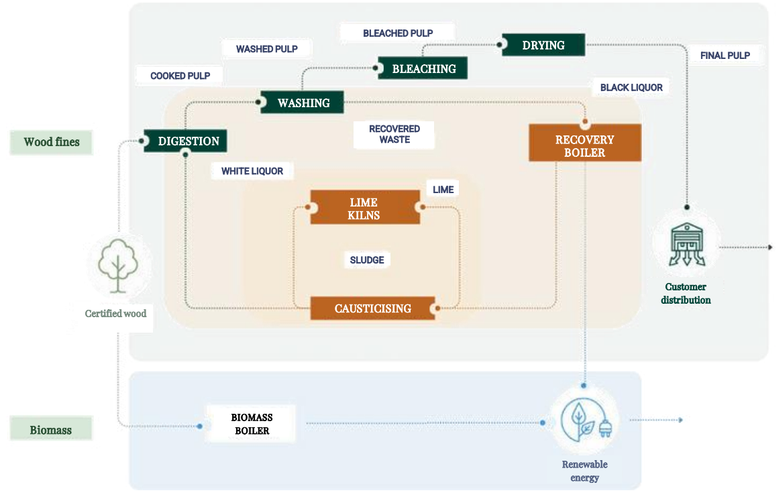
## 2.6 Circular economy (E5)

Ence's business model is based on the principles of the circular economy, making comprehensive use of renewable natural resources such as wood and biomass for the production of paper pulp, a biodegradable and recyclable material, as well as for the generation of renewable energy from agricultural, livestock and forestry waste. This circularity is reflected both in the design of production processes[22] and in the management of resources, where most of the raw materials used are renewable and the waste generated is recovered or reincorporated as secondary raw materials.

### Pulp

The **production of cellulose** at Ence is based on the use of wood as a natural and renewable resource. During the process, by-products such as bark and lignin are used as renewable energy sources, covering the energy needs of the plants and allowing the export of surpluses to the electricity grid, thus contributing to the decarbonisation of Spain's energy mix.

The process operates in a closed cycle, in which the chemicals used are recovered and reused, reducing the consumption of virgin raw materials. The result is a 100% recyclable virgin cellulose pulp for multiple paper and hygiene applications, some of them as a sustainable alternative to single-use plastic products. The durability of the final product will depend on the customers' use. In the case of cellulose packaging paper, like pulp, it is part of the product sold to customers, as it can be directly integrated into their production process. In the case of the bale binding wire, which is 100% recyclable, it can be recovered by customers.




In addition to the production of BHKP pulp, since 2025, the Navia bio-factory has started the production of fluff pulp, a product mainly intended for the absorbent hygiene products industry. The fluff manufacturing process is very similar to the BHKP pulp manufacturing process, as both processes share the same stages of debarking and chipping; chemical digestion; washing; and bleaching. From drying onwards, production processes diverge mainly by technical requirements and final product format. Fluff generally requires more dryness than paste, which means more steam consumption. As for the output format, fluff is not packaged in bales; instead it is presented in a reel format with a cardboard tube in the centre and an outer plastic packaging to protect the fluff reels and ensure dryness requirements. In addition, the sides of the coils are protected with a corrugated disc.

The main equipment involved in the production of BHKP pulp includes:

- Debarking and chipping systems: prepare the wood for firing.
- Digestors: separate the cellulose fibres from the other components (lignin, etc.) by chemical cooking.
- Washing equipment: removes chemicals and residues from the cooking process.
- Bleaches: remove the residual colour of the pulp, improving the visual quality of the pulp.
- Dryers: remove moisture to form sheets of dough.
- Recovery boilers: recover black liquor, a by-product of the cooking process that is rich in lignin, recovering chemical products and generating thermal energy.

22. No rare earths or packaging are used in Ence's production processes

- Lime kilns: heat lime slurry and regenerate calcium oxide from calcium carbonate, reintroducing it into the process and reducing the use of raw materials.

- Biomass boilers: use debarking residues and biomass to produce steam and electricity.

- Turbines and generators: transform steam into electrical energy.

- Auxiliary equipment: gas treatment systems to prevent odorous emissions, waste water treatment plant to purify effluents, electrostatic precipitators to reduce particulate emissions and stripping systems for the treatment of combustion gases and particulate matter, and air condensers and cooling towers to allow water to be returned to the steam circuit.

For the production of fluff pulp, the equipment is the same as for BHKP pulp, incorporating at the end of the process the winding and packaging equipment specific to the fluff process.

### Electrical and thermal energy with biomass

Ence generates **renewable energy** from agroforestry biomass, a natural and renewable resource from agricultural and forestry management activities near its plants. This activity not only contributes to the decarbonisation of the energy mix and industrial processes of its customers, but also offers a sustainable solution for the management of agricultural and forestry waste.

The use of waste such as prunings or biomass from forest clearing reduces uncontrolled burning, preventing potential fires and their associated environmental and public health impacts. The energy recovery from this biomass is carried out in a circular process, in which the ashes generated are recovered for use as fertiliser or in applications such as the manufacture of building materials or techno-soils.

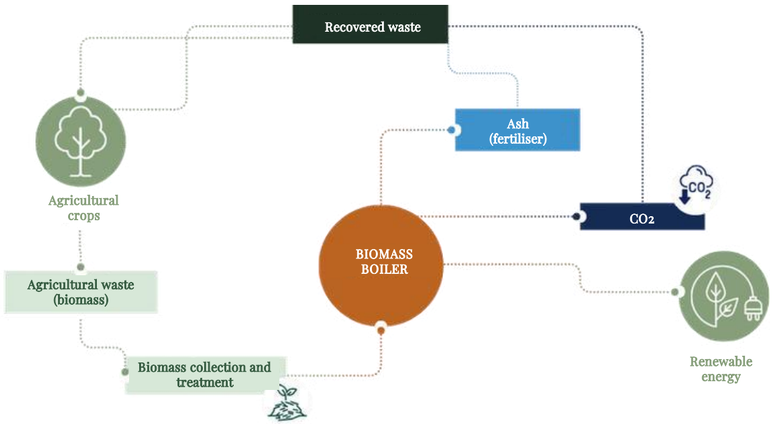
Key equipment in this process includes:

- Biomass treatment plants: they shred and classify plant waste, preparing it for energy recovery.

- Biomass boilers: where combustion takes place to generate steam.

- Turbines and generators: transform steam into electricity.

- Auxiliary equipment: waste water treatment plant, gas cleaning systems (precipitators, bag filters, etc.) and cooling equipment (air condensers and cooling towers).




### Bio-fertilisers and bio-methane

In the production of **bio-fertilisers and bio-methane**, Ence uses advanced technologies that enable the transformation of organic waste from agricultural and livestock farming activities into biogas, which after purification is converted into bio-methane suitable for injection into the national gas grid. At the same time, the digestate generated in this process is used to produce bio-fertilisers through composting, thus closing the cycle of organic waste recovery. These organic bio-fertilisers contribute to solving the problem of high nitrification of the field caused by chemical fertilisers, improving soil quality and reducing nitrate pollution. In addition, priority is given to the use of organic matter from local farming activities, which reduces emissions associated with transport and promotes the local economy. The bio-methane plants are designed to operate without generating odours, guaranteeing a respectful integration with the environment. As in the biomass electricity and thermal generation business, this line of activity offers an effective solution to the challenges posed by waste management in the agricultural and livestock industry, mitigating its environmental impacts and actively contributing to the decarbonisation of the energy system, especially in industries where electrification is more complex.

Key equipment in this process includes:

- Organic matter pre-treatment systems with shredders and mixers, optimising anaerobic digestion.

- Anaerobic digesters that allow matter to decompose in the absence of oxygen, generating biogas.

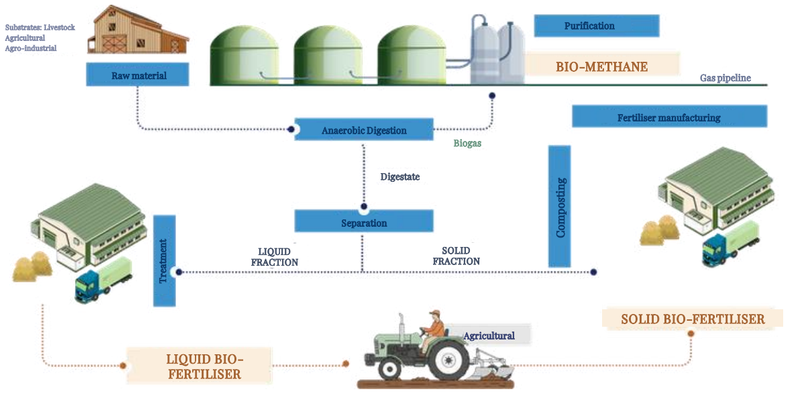
- Upgrading units that purify biogas to obtain quality bio-methane.

- Compressors for injecting bio-methane into the gas transport network.

- Composting tunnels to subject the digestate generated to an aerobic composting process, resulting in compost.

- Pelletisers that transform compost into pellets, facilitating its use as organic fertiliser.

- Air treatment equipment (bio-filters) prevents the mission of odorous compounds.




### Biomass trading

Ence's biomass trading business is fully aligned with the principles of the circular economy, providing its customers with access to biomass as a renewable alternative to fossil fuels. This biomass, from agricultural and forestry waste, enables progress to be made in the decarbonisation of industrial processes, while promoting the recovery of waste that might otherwise end up in landfills or uncontrolled burning.

**Other business lines**

Ence remains committed to diversification and the development of new circular business models that reinforce its leadership in sustainability. An outstanding example is the As Pontes Project, which focuses on the production of **bleached recycled pulp** from recovered paper and cardboard, thus eliminating dependence on wood as a raw material. This new biofibre plant, which in 2025 has received Integrated Environmental Authorisation (IEA), will produce some 100,000 tonnes of bleached cellulose pulp per year through a pioneering process that incorporates chlorine-free technology, will operate without fossil fuels and is powered exclusively by locally sourced renewable energy (biomass). This approach reduces greenhouse gas emissions by more than 45% and water consumption by more than 50% compared to conventional processes, consolidating Ence's commitment to decarbonisation and resource efficiency. The overall industrial project in As Pontes includes three phases: the first will involve the start-up of a recovered fibre plant, which includes a pilot plant for the recovery of textile fibres; the second will involve a cogeneration plant; and the third, a tissue plant. It is worth noting that in 2025 Ence, in collaboration with the Swedish start-up ShareTex, achieved a new breakthrough in the pilot textile recycling plant. In particular, it has obtained, for the first time, recycled cellulose from polycotton, opening up new opportunities for the creation of more circular textile products. In this sense, the extraction of cellulose from multi-component textile waste makes it possible to make progress in the recycling of materials that, until now, were difficult to recover efficiently. This milestone follows the success of the first successful trials of chemical textile recycling using an innovative technology that does not require high pressure, temperature or toxic solvents.

In addition, the development of projects for the generation of **renewable fuels** positions Ence as a key player in this essential area to decarbonise sectors that are difficult to electrify, such as the maritime and aviation industries. Its circular economy model is based on the generation of 100% renewable electricity from biomass, which produces large amounts of biogenic $CO_2$. Biogenic $CO_2$ far from being waste, is captured and converted into raw material for the manufacture of biofuels through processes that integrate the use of renewable green H2, thus helping to close production cycles and reduce dependence on fossil fuels. As part of this strategy, Ence, through its subsidiary Magnon, is promoting the creation of an e-methanol hub, which will transform $CO_2$ into a clean and versatile fuel, positioning Spain as a benchmark in the development of circular energy solutions. This strategy will be deployed from its energy complexes in Huelva, Puertollano and Mérida, consolidating a sustainable industrial ecosystem.

Another example is the development of a new range of sustainable packaging made from moulded cellulose, which can replace plastic packaging in the food industry and thus advance the circularity of its business model.

## 2.6.1 Impacts, risks and opportunities

Through the update of the double materiality analysis described in section ***1.4.4 Double Materiality Analysis***, a specific analysis was carried out to identify and assess the impacts, risks and opportunities related to circular economy. Consultations were also carried out both with the Group's own expert staff and with other external stakeholders.

### 2.6.1.1 IMPACTS

Although Ence promotes a model based on the circular economy, it is aware of the negative impacts that can arise in the event of inefficient use of raw materials or poor waste management. The main potential negative impacts identified include:

| Impact | Description of the impact | Prevention / mitigation measures |
|---|---|---|
| **I1: Consumption of raw materials (wood and biomass) (C / VC)** | In Ence's production processes, the essential raw materials used are renewable natural resources such as wood and biomass. If not produced by means of sustainable management, their production could have negative impacts on biodiversity. | Ence applies and promotes sustainable forest management practices that ensure a responsible supply of wood. In this regard, Ence implements an Integrated Forest Management System certified in accordance with the requirements established in the FSC® Sustainable Forest Management and Chain of Custody standards, with licence numbers FSC®-C099970 and FSC®-C081854 (Forest Stewardship Council®) and PEFC, with licence numbers PEFC/14-22-00010 and PEFC/14-33-00001 (Programme for the Endorsement of Forest Certification). At the end of 2025, 90% of the forest area managed by Ence was certified according to FSC® or PEFC. In terms of its supply chain, around 80% of the wood purchased by Ence in 2025 had one or more PEFC and/or FSC® certifications As for biomass, Ence uses agroforestry waste, such as pruning and biomass from forest clearing, which has a positive impact on waste management and fire prevention by reducing uncontrolled burning. Moreover, the biomass that Ence uses in its plants as an energy source is SURE certified, which guarantees that the biomass complies with the sustainability criteria established in Directive (EU) 2018/2001. By the end of 2025, all of the company's facilities had this certification and over 95% of the biomass consumed was also certified. |
| **I2: Consumption of other raw material (chemicals, fuels, etc.). (C / VC)** | Ence's operations use chemicals and other raw materials the extraction and transformation processes of which (upstream) can have negative impacts on the environment. | Ence seeks to replace the consumption of raw materials with by-products, such as replacing natural gas with biomethanol generated as a by-product in bio-factories. In addition, the Navia bio-factory is already using sawdust to increase the substitution of natural gas in the lime kilns, in line with the Decarbonisation Plan. For more information see section ***2.6.3 Objectives, actions and resources.*** |
| **I3: Generation of waste as a consequence of the production process (C / OO, VC)** | Ence's activities produce waste (mostly non-hazardous) which, if not managed properly, would have a negative impact on the environment. | The main waste generated at Ence's facilities is recovered for reuse in other applications. In the case of bio-factories, ashes and limestone sludge residues can be used to replace chemicals in the neutralisation of acid sludge, and as a by-product in the manufacture of cements, and in the case of power plants and bio-factories, the generated ashes and slags can be used in the manufacture of fertilisers, techno-soils and as raw materials for other products. In the case of the biogas business, the generated digestate can be used as a bio-fertiliser after composting. As for the treatment process of the waste generated at Ence's plants, it is collected and managed by authorised waste managers in accordance with current legislation. Thanks to its efforts in waste management and recovery, Ence has managed to renew its AENOR Zero Waste certification in 2025 for its pulp mills and biomass power plants, certifying that at least 90% of the waste generated is recycled or recovered, with actual ratios above 97%. |

C: Current; P: Potential / OO: Own Operations; VC: Value Chain

### 2.6.1.2 RISKS AND OPPORTUNITIES

**Risks**

Environmental risks are addressed within the framework of the TQM (Total Quality Management) management model, which integrates aspects of environmental protection, quality and health and safety in a cross-cutting manner. Within the scope of this model, the various environmental factors that affect Ence's activity are analysed, including those directly related to the circular economy, such as the consumption of raw materials and the generation of waste. For a detailed description of the environmental risk management approach, please refer to the section Cross-cutting mitigation measures within chapter *2.3 Pollution*.

Additionally, as part of the double materiality analysis process described in section *1.4.4 double materiality analysis*, a specific assessment of the impacts, risks and opportunities associated with the circular economy has been carried out. This analysis involved the active participation of Ence's main stakeholders. The main associated risk is the following:

| Risk | Description of the risk | Mitigation measures |
|---|---|---|
| **R1: Decrease in resource availability due to stricter regulation of biomass / agro-livestock waste** | Regulatory changes related to biomass (especially of forest origin) set by standards such as the new Renewable Energy Directive (RED III) may restrict access to these resources by affecting their use in power generation. | In the case of energy generation using biomass, Ence has defined a strategy to increase the capacity to mobilise biomass and diversify the supply chain in order to be able to use alternative biomasses that are not affected by REDIII restrictions. |

The risk management process related to circular economy is integrated into the company's global risk management process described in section *1.4.6.6 ESG risk identification, assessment and management process* and the risks stated here are included in Ence's Risk Map.

**Opportunities**

Ence's circular economy model generates business opportunities that enable it to optimise waste management, reduce operating costs and create added value through the recovery and marketing of by-products derived from its industrial processes. These opportunities include the reuse of ash and slag from biomass power generation in the manufacture of fertilisers, building materials and other industrial uses; the use of lignin as a feedstock for bio-fuels and other industrial applications; the commercialisation of $CO_2$ and bio-methanol for the production of e-fuels; the generation of bio-fertilisers from digestate in biogas plants; increased resource availability through diversification of the biomass and biogas (straw) supply chain; and the generation of income from the sale of plastic substitutes. For more information on how these opportunities are integrated into the corporate strategy, see section *1.3 Strategic framework.*

## 2.6.2 Environmental policy

The Corporate Environmental Policy approved by the Board of Directors, and available on the website, formalises and develops the company's commitment to protecting the environment in its operations and complying with environmental regulations. This Policy establishes a number of general principles for action that apply to all environmental aspects and then determines the priority lines of action to manage environmental impacts, risks and opportunities, including those related to the circular economy.

Among the priority lines of action, Ence's Environmental Policy promotes the circular economy and the responsible use of resources, prioritising the use of renewable and recycled raw materials, as well as reducing the consumption of fossil resources. The selection of materials with a better environmental profile is encouraged through life cycle analysis, avoiding the use of raw materials associated with deforestation or forest degradation. In addition, the minimisation of waste and its recovery is promoted, aligning processes with Zero Waste certification and exploring new ways of using by-products. The policy also integrates environmental criteria into product design, promotes sustainable forest management and reinforces energy efficiency and the use of renewable energies in all Group activities.

This policy applies to all Ence Group companies and employees, as well as to suppliers and contractors providing services at Ence facilities.

## 2.6.3 Objectives, actions and resources

**Strategy and Objectives**.

The Circular Economy Strategy is fully integrated into both the 2024–2028 Strategic Framework and the Sustainability Master Plan for the same period, which define the main lines of action at the corporate level to continue consolidating the principles of circularity in the business model. The Strategic Framework places special emphasis on advancing the circularity of the pulp business, through initiatives such as the development of sustainable moulded pulp packaging to replace plastic in the food sector, or the start-up of the new paper and cardboard recycling line with the As Pontes Project, focused on the production of recycled pulp bleached from recovered materials, a project recognised as a strategic industrial project by the Xunta de Galicia.

For its part, the Sustainability Master Plan incorporates the circular economy as a specific line of action within the "Bioproducts and ecosystem services" pillar, aimed at developing secondary raw materials derived from production processes, with the aim of expanding the range of products and diversifying the customer portfolio. For more information, see section *1.4.5 2024-2028 Sustainability Master Plan and annual targets.*

| Lines of action | Identification of IROs | Main measures | Objectives[23] | Waste hierarchy[24] | Type of objective[25] |
|---|---|---|---|---|---|
| Boost the circular economy by developing secondary raw materials | I2, I3, R1 | Number of R&D projects on new secondary raw materials | Pulp: 3 projects (2028)<br>Energy: 2 projects (2028) | Prevention | Outputs, increased circular design of processes |
| | I1, I2, I3, R1 | Increased sales of new secondary raw materials | Pulp: 4,000 metric tons (industrial waste and lignin) in 2028 | Prevention | Outputs, increased circular design of processes |
| | I2, I3, R1 | % of waste recovered + by-products for which we receive financial remuneration / total waste produced | Energy: increase by 2% from 2022, to reach 8% in 2028 | Recovery | Outputs, waste management |

Taking into account the objectives of the Sustainability Master Plan in line with the development of secondary raw materials, the following are the annual objectives defined for 2025, the performance achieved in relation to them, and the targets set for 2026, all related to the prevention of waste generation through the increase in circular design of processes:

| Lines of action | Business | 2025 Objective | 2025 Performance | 2026 Objective |
|---|---|---|---|---|
| Circular economy | Energy | Achieving by-product status for HU46 ashes | Achieved | - |
| | Pulp | Use of paper waste to obtain cellulose pulp: Start of OCC trading activities of the Sustainability and Circular Economy Company (SCE) as a waste manager. | Achieved | - |
| | | Develop 2 waste recovery projects that bring economic benefit | Completed | Development of 1 waste recovery project that brings economic benefit |
| | Group | Renew **Zero Waste** certification (>90% of waste generated for recycling or recovery). | Certification obtained | Renew certification |

Regarding the monitoring of objectives, the Management Committee reviews the annual objectives on a monthly basis and reports progress to the Board of Directors. The Board's Sustainability Commission also reviews the progress of the annual objectives on a quarterly basis.

Furthermore, in 2024, Magnon certified its circular business model according to the AENOR Model for the **certification of business strategies aligned with the principles of the Circular Economy**, covering the activities of renewable electrical and thermal energy generation, as well as the trading business. In 2025, the follow-up audit was carried out, confirming the adequacy of the entire Circular Economy model and strategy, which takes into account not only waste management but also different environmental vectors, such as water.

23. *The objectives that have been set go beyond legal compliance, as they are voluntary objectives. They have also been defined as part of the Sustainability Master Plan in which the different Ence departments responsible for achieving them took part as stakeholders. The established objectives refer to Ence's internal management indicators that are applicable to direct operations, so it was not necessary (not applicable) to review scientific evidence in their definition.*
24. *Waste hierarchy: (a) prevention; (b) preparation for re-use; (c) recycling; (d) other recovery, e.g. energy recovery; and (e) disposal.*
25. *The type of objective refers to whether the objective is related to resource inputs or outputs including waste.*

**Actions and resources**

One of the lines of work of Ence's Circular Economy Strategy is to recover its waste, so that it can continue to circulate in the economic cycles, avoiding the generation of waste and the economic and environmental cost of waste management. Examples of projects include:

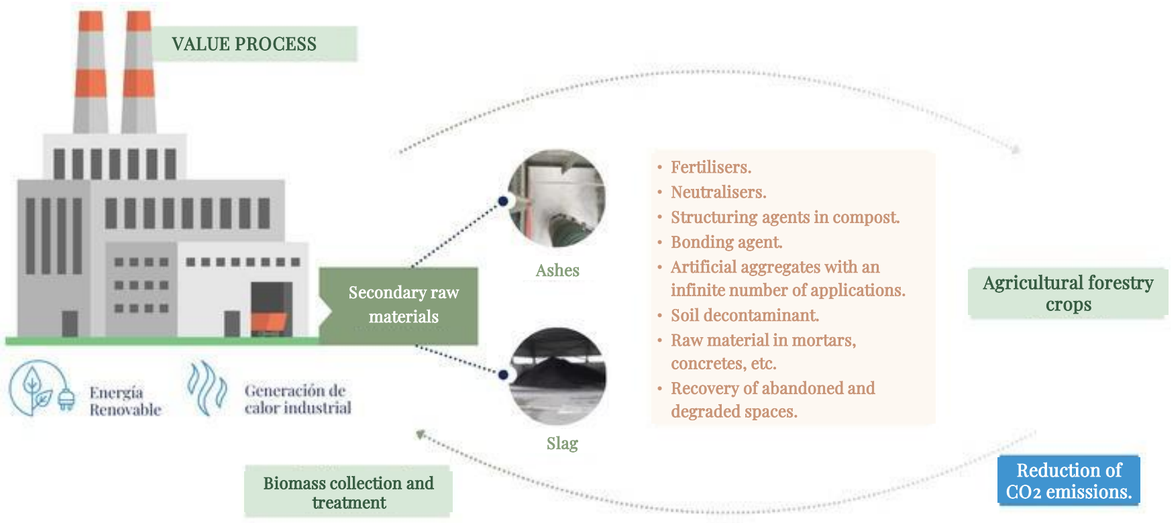
In bio-factories, the main wastes are recoverable and can be used in other applications that enable their recovery; examples include:

| Main waste | Waste recovery actions |
|---|---|
| **Ashes** from the combustion of biomas are mainly inorganic mineral such as oxides of calcium, potassium, magnesium and phosphorus. | Ence is undertaking innovative projects to recover the ashes generated during the energy generation process in the bio-factories. One of these projects is in the testing phase and consists of using the ashes for **landscape restoration** in quarries. This approach seeks to restore degraded areas, enhancing the natural environment and promoting biodiversity.<br>Another, more established project uses ash as a product for the **inertisation of acid sludge**. This process involves neutralising the acid sludge, making it safer and less harmful to the environment. In addition, in 2025, ash will be used as a raw material in the production of **cement**. |
| **Slag** is solid waste formed during the combustion of biomass. They are composed mainly of inorganic minerals and may contain traces of ash and non-combustible materials. | Slag from different plants is currently being reclaimed with different options, including **fertiliser production** and **cement production**, among others. |
| **Lime sludge**, a by-product of the cellulose production process, contains mainly calcium carbonate (CaCO3) and is generated during the regeneration of lime in the lime kiln. | Ence has conducted a pilot trial to use limestone sludge as a raw material in **cement production**. This trial has yielded positive results, demonstrating that limestone sludge can be effectively included in the cement manufacturing process. This approach not only provides a solution for the management of sludge, but also contributes to the reduction of the use of traditional raw materials in the cement industry. |

In addition to the innovative projects described above, the main bio-factory wastes (limestone sludge, dregs, ash and slag) have traditionally been used in recycling and recovery applications, such as the manufacture of techno-soils to improve soil quality and restore degraded areas.

Furthermore, since 2023, Navia has been recovering energy from the sludge produced by the secondary treatment process at its treatment plant (the sludge from the primary treatment process is already being recovered). Thus, by 2025, it will be possible to recover more than 8,000 tonnes of this type of waste.
The use of bio-sludge in the biomass boiler, thus contributing to a significant reduction in the carbon footprint associated with the transport of this waste.

Thanks to these efforts, Ence's bio-factories have had AENOR Zero Waste certification since 2019, which guarantees that more than 90% of the waste generated is recycled or recovered and less than 10% is managed using landfill.



Meanwhile, in **biomass power plants**, the main waste products are also recovered:

| Main waste | Waste recovery actions |
|---|---|
| Ash and slag produced in the biomass boiler. Ash is mainly inorganic mineral such as oxides of calcium, potassium, magnesium and phosphorus. Slag is waste that is coarser than ash and consists of ash residues and non-combustible materials. | The ash produced at the Huelva complex facilities (HU50 and HU46) is administratively recognised as a by-product for the **production of underground mining slurry**.<br>In addition, in 2025, fly ash generated in the process has been progressively incorporated as a cementitious material in the manufacture of the paste to be used to fill chambers and underground galleries. This ash, hitherto considered a waste product, was officially declared a by-product by the government, allowing its specific use at two of Sandfire MATSA's mines: Aguas Teñidas and Magdalena, located in Almonaster la Real.<br>In Puertollano, work is being done along the same lines to make use of ash and slag **for the manufacture of mortar and cement** by providing silicon and calcium oxides.<br>Slag is used in the formulation of technosoils to reclaim degraded soils, such as after mining operations. In this area, Ence participates in RD&I projects, including the Tekura project, which aims to restore a mine in Salamanca. For this project, the Puertollano plant provides slag, which is used to manufacture technosoils to neutralise the effects of mining activity. The same use is given to the slag from the energy plant located in Mérida, as it is destined for a nearby mine in La Garrovilla (Badajoz). The restoration project is based on the creation of technosoils using slag from biomass combustion boilers and municipal solid waste (MSW). On the other hand, when there is a high consumption of pomace in the boiler, the resulting ashes are rich in potash, which makes them suitable for the production of **fertilisers**. |

Ence is also developing other projects linked to the circular economy, such as:

- **Return the fines that arrive with the biomass to the source** in order to avoid soil degradation due to agricultural and forestry exploitation continues. With this initiative that started in 2022, a natural material with value for the fight against desertification and soil degradation is returned.
- Ence is committed to technological development and innovation as levers for a fair and efficient energy transition. Along these lines, Ence is promoting the development of a pioneering industrial platform for the **capture of $CO_2$ capture and production of e-methanol** at the Huelva, Puertollano and Mérida plants, where around three million tonnes of $CO_2$ per year, with the aim of decarbonising sectors such as maritime transport, aviation and the chemical industry.
- An R&D project for the generation of ecological mortar is being carried out in collaboration with a cement plant.

### Earmarked resources

In 2025, the total investment (Capex) related to the Circular Economy was almost €4 million.

- Among the most noteworthy investments is the As Pontes Project for the manufacture of bleached recycled pulp using recovered paper and cardboard as raw material, which has concentrated 90% of the investment.
- Also noteworthy are the projects related to the reduction of waste generation, which have concentrated 6% of investment, including actions to increase the dryness of the sludge generated in Navia, thus reducing the volume of waste to be managed.

This category also includes investments related to **ash recovery** projects, actions for the reduction of fines and aggregates and actions aimed at **reducing the consumption of raw materials** such as chemicals.

## 2.6.4 Metrics

### Consumption of raw materials

Wood and biomass consumption account for 97% of total raw material consumption. For both wood and biomass, Ence applies a sustainable management model through the implementation of wood certifications according to FSC® and PEFC standards and biomass sustainability with SURE certification. For more details, see section **Sustainable timber and biomass management**.

Of the biomass consumption, 83% comes from agricultural and forestry residues that are revalued for energy generation in plants and bio-factories and in industrial heating facilities, representing 32% (1,721,493 t) of the total consumption of raw materials. The other 17% corresponds to internal biomass generated during production processes (e.g. during the debarking of wood) and sewage sludge. These secondary raw materials, generated during the process, represent 6.5% (346,142 t) of the total consumption of raw materials. Moreover, Ence uses biofuels generated during the pulp production process such as black liquor (a by-product of the Kraft process when wood is converted into cellulose pulp by removing lignin and hemicellulose) and biomethanol (a biofuel obtained from the treatment of gases from the digestion process). For more details, see section *2.2.5.1 Energy consumption*.

| Consumption of raw materials (t) | 2023 | 2024 | 2025 | Methodology (1) |
|---|---|---|---|---|
| Wood | 3,334,971.00 | 3,263,701.00 (2) | 3,086,938.60 | M/C |
| **Pulp Business** | **3,334,971.00** | **3,263,701.00** | **3,086,938.60** | **M/C** |
| Biomass | 1,734,124.00 | 1,996,621.00 | 2,067,635.50 | M/C |
| **Pulp Business** | **626,817.00** | **662,858.00** | **620,526.00** | **M/C** |
| **Energy Business (3)** | **1,107,307.00** | **1,333,763.00** | **1,447,109.50** | **M/C** |
| Agro-livestock waste | | | 31,866.40 | M/C |
| **Bio-fertiliser and bio-methanol business** | **-** | **-** | **31,866.40** | **M/C** |
| Agro-livestock waste (4) | - | - | 31,866.40 | M/C |
| Chemical products | 104,724.10 | 114,105.30 | 104,951.60 | M/C |
| **Pulp Business** | **101,652.60** | **110,953.40** | **101,514.30** | **M/C** |
| Soda | 22,523.70 | 22,083.20 | 20,329.20 | M/C |
| Sulphuric acid | 21,747.90 | 22,709.90 | 20,406.50 | M/C |
| Oxygenated water | 10,068.20 | 11,816.30 | 11,119.40 | M/C |
| Chlorate | 13,058.30 | 13,585.70 | 11,788.10 | M/C |
| Sodium carbonate(5) | 383.7 | 2,737.00 | 1,799.60 | M/C |
| Oxygen | 22,555.10 | 23,980.50 | 22,238.00 | M/C |
| Lime | 11,315.70 | 14,040.90 | 13,833.60 | M/C |
| **Energy Business (3)** | **3,071.50** | **3,151.80** | **3,360.00** | **M/C** |
| Soda | 589.1 | 660.9 | 717.8 | M/C |
| Ammonia | 1,654.30 | 1,929.80 | 1,985.50 | M/C |
| Sulphuric acid | 69.3 | 80.9 | 104.8 | M/C |
| Lime | 516 | 133.5 | 201.9 | M/C |
| Hypochlorite | 208.6 | 269.9 | 286.2 | M/C |
| Hydrochloric acid | 34.1 | 76.8 | 63.8 | M/C |

| Consumption of raw materials (t) | 2023 | 2024 | 2025 | Methodology (1) |
|---|---|---|---|---|
| **Bio-fertiliser and bio-methane business** | **-** | **-** | **77.3** | **M/C** |
| Ferric chloride | - | - | 76.8 | M/C |
| Biocide | - | - | 0.5 | M/C |
| Packaging (6) | 4,518.5 | 4,704.3 | 4,535.8 | M/C |
| **Pulp Business** | **4,518.5** | **4,704.3** | **4,535.8** | **M/C** |
| Wrapping paper | 2,231.9 | 2,328.1 | 2,326.1 | M/C |
| Tied and unitised wire | 2,286.6 | 2,376.3 | 2,209.7 | M/C |
| Other | 8,403.60 | 7,452.00 | 13,936.20 | M/C |
| **Pulp Business** | **-** | **-** | **3,096.3** | **M/C** |
| Sawdust for lime kilns (7) | - | - | 3,096.3 | M/C |
| **Energy Business (3)** | **8,403.6** | **7,452.0** | **10,839.9** | **M/C** |
| Sand (8) | 8,403.6 | 7,452.0 | 10,839.9 | M/C |
| **Total** | **5,186,741.2** | **5,386,583.6** | **5,309,864.1** | **M/C** |
| **Pulp Business** | **4,067,959.2** | **4,042,216.8** | **3,816,611.0** | **M/C** |
| **Energy Business (3)** | **1,118,782.1** | **1,344,366.9** | **1,461,309.4** | **M/C** |
| **Bio-fertilisers and bio-methane business** | **-** | **-** | **31,943.7** | **M/C** |

(1) Measured (M); Calculated (C); Estimated (E).

(2) Recalculated data, error in 2024 on the amount of wood consumed.

(3) The energy business includes stand-alone biomass power plants. Also, since 2024, the Energy business will also include the biomass thermal power business.

(4) In mid-December 2024 the Galera is acquired; therefore, from 2025 onwards, the consumption of slurry, sewage sludge, food waste and, to a lesser extent, other waste is included.

(5) From 2024, the increase in the price of soda led to its substitution by sodium carbonate.

(6) Excluding the packaging of fluff paste.

(7) Since 2025, as part of the Decarbonisation Plan, sawdust is used instead of fossil fuels in the Navia lime kilns.

(8) The Huelva plant consumes sand for the fluid bed boiler.

The quantification of wood and biomass consumption is carried out through mass balances (initial stock + inputs - final stock - wastage). In the case of wood, inputs are measured directly at the weighbridge and stored material (e.g. wood chip silos) is also taken into account. In the case of biomass, pulp mills consider both internal biomass (generated on-site, such as wood debarking), external biomass (e.g. from suppliers) and biomass resulting from water treatment (sewage sludge). Data on internal biomass consumption are derived from direct measurements (e.g. dynamic scales) or from calculations based on the consumed volume of wood. External biomass is calculated by stock change (opening stock + receipts - closing stock). In the case of sewage sludge, this information is extracted from the PI system through automatic reading. In the case of power plants, biomass consumption is obtained from direct measurements at the scales or from the incoming conveyor belts. In the case of chemicals and sand, a mass balance (inputs + opening stock - closing stock) is also carried out. Inputs are recorded according to the weighing scales at the entrance to the facilities, in the case of bulk supply, or with the delivery note record. The stock in storage is measured according to the reading of the storage tanks. For packaging materials, they are measured directly on the scale and the information is automatically transferred to PI.

## Waste

| 1. Hazardous waste (t) | | | | 2. Non-hazardous waste (t) | | |
|---|---|---|---|---|---|---|
| | 2024 | 2025 | | | 2024 | 2025 |
| **Recovery operation** | **271** | **181** | | **Recovery operation** | **300,640** | **353,851** |
| Preparation for re-use | 0 | 0 | (a) | Preparation for re-use | 0 | 0 |
| Recycling | 59 | 15 | (b) | Recycling | 56,136 | 95,803 |
| Other recovery operations(1) | 212 | 166 | (c) | Other recovery operations(1) | 244,504 | 258,048 |
| **Disposal operation** | **36** | **40** | | **Disposal operation** | **1,252** | **581** |
| Incineration | 0 | 0 | (d) | Incineration | 0 | 0 |
| Landfill | 0 | 0 | (e) | Landfill | 1,183 | 0 |
| Other disposal operations | 36 | 40 | (f) | Other disposal operations | 69 | 581 |
| **TOTAL HAZARDOUS WASTE** | **307** | **221** | | **TOTAL NON-HAZARDOUS WASTE** | **301,892** | **354,432** |
| | | | | **TOTAL WASTE (1+2)** | **302,199** | **354,652** |
| | | | | **TOTAL RECOVERED WASTE (%)** | **99.60%** | **99.80%** |
| | | | | **TOTAL LANDFILL WASTE (%)** | **<1%** | **<1%** |

(1) According to waste legislation (Act 7/2022 on waste and contaminated land for a circular economy) waste managers must provide the necessary information to disaggregate the waste they manage by type of recovery operation (preparation for reuse, recycling or other recovery operations) or by type of disposal operation (incineration, landfill or other disposal operations). To do so, managers must provide a four-digit code. This requirement is mandatory only if the manager has this coding in the scope of its authorisation. Full implementation of this obligation has a transition period. Currently, most managers are in the process of adaptation and the information provided only includes a two-digit code, differentiating whether it is a recovery or disposal operation, but without being able to detail what type of recovery or disposal. Therefore, most of the recovered waste (72.9%) has been included in the category "other recovery operations". It is expected that as managers adapt their permits, they will be able to provide more information and therefore the % of non-recycled waste, currently at 73.0% (258,834 t), will decrease.

The quantity of hazardous and non-hazardous waste generated is obtained from the information supplied by the waste manager either on the manager's scales or on Ence's scales after reception by the manager.

# 03 | SOCIAL



# 03

# SOCIAL

## 3.1 In-house staff (S1)

Ence's growth and diversification strategy depends on the commitment of its employees, which is key to executing strategic initiatives. The company recognises their essential role at all levels and is committed to their motivation, support, security, well-being and professional development.

Ence has a diverse range of employees who play crucial roles in the operation and success of the company. Below is a (non-exhaustive) breakdown of the main types of company employees:

- **Plant operators**: in charge of the daily operations in pulp production and power generation plants, ensuring the efficient and safe operation of equipment and processes.
- **Forestry technicians and standing procurement teams**: this includes the forestry and forest management specialists who plan and monitor forestry activities to maximise productivity and sustainability, as well as the network of buyers who contact forest and agricultural owners to purchase wood and/or standing biomass (and then manage its harvesting).
- **Technicians**: professionals with specific knowledge in areas such as engineering, maintenance, quality and environment, who support the optimisation and ongoing improvement of processes.
- **Auxiliary and support staff**: employees who manage financial and human resources duties, ensuring the required support for daily operations and regulatory compliance.
- **Sales team**: responsible for the promotion and sale of Ence products, as well as for managing customer relations and identifying new business opportunities.
- **R&D researchers and technicians**: professionals focused on the research and development of new products and technologies, contributing to the company's innovation.
- **Business development teams**: responsible for the start-up of Ence's new business lines, in charge of processes such as land management, relations with potential partners and suppliers, administrative processing of projects and coordination with engineering and technology partners for the design of new plants.
- **Management**: leaders who set the strategic direction of the company, make key decisions, manage teams and oversee the overall performance of the organisation.

The workforce is concentrated in Spain and Portugal, countries with a low risk of human rights violations, with no evidence of forced or child labour. Ence's main work centres (by number of employees) are the cellulose pulp production bio-factories located in Navia (Asturias) and Pontevedra (Galicia), as well as energy generation plants in Huelva (Andalusia); Enemansa (Ciudad Real - Castilla La Mancha); Lucena (Córdoba - Andalusia); La Loma (Jaén - Andalusia); Mérida (Extremadura) and Puertollano (Ciudad Real - Castilla La Mancha) and the corporate offices in Madrid. In addition, since December 2024 it has a bio-methane generation plant in Tarragona (Catalonia). With regard to the group of non-wage-earning employees, Ence only has interns whose duties, and associated economic compensation, is directly related to work experience linked to completing or complementing their academic training.

### 3.1.1 Impacts, risks and opportunities

Through the double materiality analysis described in section *1.4.4 Double materiality analysis*, a specific analysis was carried out to identify and assess the impacts, risks and opportunities related to in-house staff.
Consultations were also carried out both with the Group's in-house staff and with other external stakeholders.

#### 3.1.1.1 IMPACTS

Although Ence places people at the centre, it is aware that there may be negative impacts on its in-house personnel in the event of poor management of operations or the application of inadequate people management policies. In order to identify the negative impacts on different groups of its in-house personnel, Ence has dialogue mechanisms for employees to report any incidents or concerns, thanks to which it is possible to identify whether there is any particular group that could be more exposed to negative impacts (see section *3.1.4 Dialogue and participation processes*). The main negative impacts identified are detailed below:

| Impact | Description of the impact | Prevention / mitigation measures |
|---|---|---|
| I1: Occupational accidents (C) | If employees are not sufficiently aware or the company does not apply preventive measures, there could be negative impacts in terms of accidents at work. | Ence reinforces occupational health and safety through specific training for all employees (see section *3.1.8.4 Training*) and the implementation of a management model certified under ISO 45001 at all its industrial operations centres in the pulp business and biomass power plants (see section *3.1.8.3 Risk prevention and management model*). This integrated approach, described in section *3.1.8 Health and safety* has enabled us to achieve accident rates well below sectoral and national averages. |
| I2: High employee turnover (P) | Low staff loyalty could lead to high employee turnover. | Ence has developed a comprehensive offer for its employees, covering all aspects of their work experience, such as compensation, training and professional development, as well as active work-life balance and equality policies (see section *3.1.5.3. Managing, attracting and retaining talent*). |
| I3: Cases of discrimination or other Human Rights violations (P) | Human Rights violations at work refer to any possible action or inaction that compromises the basic rights of workers. This may include discrimination based on race, gender, religion, sexual orientation or disability, as well as harassment, exploitation at work or unsafe working conditions, among others. | Ence applies zero tolerance policies against discrimination and human rights violations, promoting respect and equality through the Code of Conduct, the Diversity and Equal Opportunities Policy, the Sustainability Policy and the Harassment Prevention Protocol (see section *3.1.4.3 Integrity Line*).<br>To guarantee the effective protection of rights, Ence has secure and confidential reporting mechanisms (see section *3.1.4.3 Integrity Line*) that allows incidents to be reported without risk of reprisals. |

C: Current; P: Potential / In relation to in-house staff, all impacts occur in Own Operations

For mitigation measures, as well as the processes of evaluation, monitoring and resources allocated to them, the different policies and procedures applicable to each of the matters are taken into account. Thus, for example, to mitigate the impacts related to accidents, the provisions of the health and safety management system are considered; or the Policy and Procedure of the Integrity Line regarding the measures to be implemented in the area of human rights violations.

Ence's activity also has a positive impact on its employees, including:

- Increase of the presence of women in a traditionally male-dominated industry through measures to increase the percentage of women in the workforce (see section 3.1.6 Diversity and equal opportunities).
- Improvement of occupational safety by raising awareness through training actions (see section *3.1.8 Health and safety*).
- Improved employee development and performance through training plans (see section *Training and professional development*).
- Employee loyalty through the implementation of employee value creation measures (working from home, attractive salaries, etc.) (see *3.1.5.2 Quality employment; 3.1.7.2 Welfare plans*; and *Remuneration*).

For its part, Ence's growth and diversification strategy focused on business models based on the circular and low-carbon economy is directly reflected in the human team. For the development of new lines of business such as the sale of renewable thermal energy, biomass trading or the development of bio-fertiliser and bio-methane plants, there is a need for professional profiles with the appropriate knowledge to respond to new strategic needs.
Moreover, meeting efficiency, new product development and decarbonisation targets entails the modification and redefinition of industrial processes. In this context of change, business diversification and modifications in production processes, there is a need to adapt the skill set of employees to the new reality of the company. In order to meet this challenge, Ence provides specific training to improve skills and acquire new knowledge. An example of this is the sustainability training that is undertaken through different initiatives aimed at all employees to integrate sustainability principles into the organisational culture. In 2025, more than 15% of the workforce participated in training activities related to sustainability, with 347 hours of training being provided in this area.

### 3.1.1.2 RISKS AND OPPORTUNITIES

**Risks**

Ence's relations with its employees are key to its strategy. Managing occupational risks is key to reducing negative impacts. The main risks identified are described below:

| Impact | Description of the risk | Mitigation measures |
|---|---|---|
| **R1: Non-compliance with labour regulations.** | Possible breaches of labour regulations, including but not limited to hiring, working hours, equality, union representation or social security, can lead to fines and sanctions for the company. | Ence has specific policies that enable it to ensure compliance with the requirements of labour legislation. These policies include the Working Time Policy, the Diversity and Equal Opportunities Policy, the Sustainability Policy, the Code of Conduct and the Harassment Prevention Protocol (see section ***3.1.2 Policies related to in-house employees***).<br>Ence also has an Integrity Line as a whistleblowing mechanism for employees to report rights violations (see section ***3.1.4.3 Integrity Line***). |
| **R2: Non-compliance with health and safety regulations** | Possible non-compliance with labour regulations on Occupational Risk Prevention. | Ence has an ISO 45001 certified model for the prevention and management of health and safety risks, complemented by monthly monitoring of indicators and annual internal and external audits. In addition, resources and procedures for safe environments (e.g. Standard Operating Procedures for specific jobs; Preventive Health and Safety Observations, etc.), business coordination tools (CTAIMA) and advanced methodologies such as PSM (Process Safety Management) are available. |
| **R3: Strikes among in-house staff** | Strikes by in-house staff can affect operational continuity, leading to production losses, delays and breaches of contract with economic and reputational impact. This risk often arises in collective bargaining processes or organisational changes. | ▪ **Social dialogue and negotiation:** effective channels with trade unions and representatives to address concerns and prevent conflict.<br>▪ **Improved working conditions:** welfare policies, competitive wages, flexible working hours, etc.<br>▪ **Contingency plans:** protocols to minimise the impact in case of strike disruptions. |
| **R4: Breaches related to employee data privacy.** | When employees' personal data is not adequately protected, there is a risk that this information is accessible to unauthorised persons, which can result in sanctions and loss of reputation for the company. | Ence has several policies and actions in place to protect the privacy of its employees' data, including the following:<br>▪ Privacy Policy regulating how the personal data of employees, contractors and suppliers is collected, processed and protected.<br>▪ Data protection officer in charge of monitoring compliance with data protection rules.<br>▪ Technical and organisational measures to protect personal data against unauthorised access, loss, destruction or alteration.<br>Furthermore, in addition to these measures, Ence has a Cybersecurity Plan (see section ***4.7 Cybersecurity***). |

The risk management process related to in-house staff is integrated into the company's global risk management process described in section ***1.4.6.6 Risk management approach*** and the risks stated here are included in Ence's Risk Map.

**Opportunities**

Although Ence is exposed to certain risks, the company recognises that proper management of human capital generates significant opportunities. Developing new skills among employees not only boosts their professional growth, but may also open doors to new business opportunities. A committed and well-trained team increases efficiency and productivity, strengthening the organisation's competitiveness. The value proposition for employees and the commitment to a positive working environment reinforce Ence's reputation as an employer and make it easier to attract talent. Less turnover and greater loyalty reduce recruitment and training costs, ensuring stability and continuity.

## 3.1.2 Policies related to in-house employees

Ence has several human capital management policies in place to identify, mitigate, and where appropriate, remedy the potential risks and negative impacts related to employees identified in the section ***3.1.1 Impacts, risks and opportunities***. These policies are the basis of the culture to ensure a healthy, safe, diverse, inclusive, fair, transparent, participatory and equitable work environment.

The Code of Conduct (website) updated in 2025 and approved by the Board of Directors, is the fundamental pillar that recognises labour rights and establishes commitments in terms of health and safety, equal opportunities and prevention of harassment, aligned with international human rights principles.


Under the umbrella of the Code of Conduct, the following **specific policies stand out:**

- **Diversity and equal opportunities policy** (website), approved by the Board of Directors, aims to ensure real equality; avoid discriminatory conduct based on gender, age, race, nationality, ethnic origin, sexual orientation, religion, ideology, marital status, family responsibility or disability; promote conciliation and inclusion; and encourage the balanced representation of women in positions of responsibility. It also ensures the principle of equal treatment in recruitment and hiring processes; promotes diversity on the Board of Directors; ensures work-life balance; and contributes to the inclusion of people with disabilities. This policy extends its commitment to diversity and equality to Ence's value chain.

- **Health and safety policy** (website), approved by the Board of Directors, establishes the principles of action to implement a cross-cutting safety culture throughout the company. It integrates safety into all operations, prevents risks, ensures regulatory compliance and requires consistent standards for employees and suppliers.

- **The Sustainability Policy** (website), reinforces the commitment to internationally recognised human rights and the highest ethical standards, ensuring that all activities are carried out in an accountable and activities are conducted in an accountable and transparent manner (see section ***1.4.2 Sustainability policies***).

These policies are complemented by specific rules such as the Working Time Policy, the Harassment Prevention Protocol and the Recruitment Procedure, together with secure and confidential reporting mechanisms (Integrity Line) and internal training and communication actions.

## 3.1.3 Strategic Plan for People

In 2024, Ence approved the **2024-2028 Strategic Plan for People** in order to support the deployment of the company's growth and diversification strategy, optimise operational efficiency and foster a dynamic working environment that promotes the professional and personal growth of all employees. Within the framework of this plan, Ence has established a number of objectives focused on maximising opportunities and responding to the impacts and risks identified in relation to its own personnel (see section ***3.1.1 Impacts, risks and opportunities***).

The definition of the 2024-2028 Strategic People Plan has been carried out considering both internal factors, linked to Ence's strategic needs and the expectations of its human team, and external factors, related to global trends and challenges in people management:

### Structure and objectives

The 2024-2028 Strategic Plan for People is structured around 4 core concepts:

1. Improve the **employee experience** and align their expectations with Ence's value proposition.
2. Strengthen the **leadership of managers**.
3. Strengthen the **brand image** and position the company as a benchmark employer.
4. Improve the efficiency of **people management processes** and manage through data (People Analytics).

As a cross-cutting objective, the reinforcement of **internal communication** is established, creating new channels and points of interaction between employees.
For each core concept, specific actions and voluntary objectives have been defined for the entire workforce, taking into account both internal and external factors identified in the elaboration process.

### 1 Improve the employee experience and align their expectations with Ence's value proposition.

- **Description:** the Ence employee experience is managed through all the key moments of the employment cycle (personal and professional), from attracting talent to leaving, ensuring that each stage reflects the company's value proposition.

1 EMPLOYER BRAND

2 ONBOARDING

3 TRAINING AND DEVELOPMENT

4 ONGOING (COMPANY LIFE)

5 EMPLOYEE VALUE PROPOSITION

With a special focus on:
- Compensation and benefits
- Work environment Physical
- and emotional wellbeing

6 LEADERSHIP AND COMPANY CULTURE

7 DIVERSITY, EQUITY AND INCLUSION

8 OFFBOARDING

**Actions and initiatives:**

- Employer brand: Ence understands that its image as an employer brand only makes sense if it faithfully reflects the real experience of those who form part of the company. For this reason, the company promotes programmes and campaigns that reinforce the value proposition and corporate culture, such as the Talent Programme for young people, the Benchmark Campaign to recognise excellence, and the Senior Talent Campaign to highlight generational experience and diversity.
- Onboarding: Ence accompanies new recruits to ensure their cultural and operational integration from the outset, through structured processes that include initial training, documentation and the provision of resources. In 2025, faced with the challenge of offshoring derived from new lines of business and remote work, the Onboarding and Monitoring Procedure for Offshore Personnel was approved, which ensures effective reception, continuous communication and comprehensive evaluation of performance, well-being and satisfaction, reinforcing the management-employee connection in hybrid environments.
- Training and Development: initiatives focused on promoting the learning and growth of employees throughout their careers.
- Ongoing (company life): Actions to accompany the employee at key moments, adapting the leadership model to hybrid and remote environments.
- Employee Value Proposition (EVP): Actions to improve the overall employee experience, integrating benefits, well-being and professional development.
- Diversity, equity and inclusion: Programmes to promote an inclusive and equitable environment, encouraging diversity at all levels of the organisation.
- Offboarding: Processes to manage the exit in a positive way by ensuring that the employee retains a favourable perception of the company after leaving.

**Related objectives**

All of the above initiatives aimed at improving the employee experience have two main objectives: improving employee perception (thus increasing employee loyalty) and promoting development and equality.

| IRO | Objective | 2025 Objective | 2025 Performance | 2026 Objective |
|---|---|---|---|---|
| I2, R3 | Improve the eNPS (employee Net Promoter Score). | N/A | - | Improve the base year score by 50% in 2028 (base year score = 19). |
| I2, R3 | Keep a low turnover rate in key positions (no. of voluntary departures of Key Persons / total no. of Key Persons). | <2% | 1.4% | <2% |
| I2, R3 | Boost internal promotion (no. of vacancies filled by internal promotions / no. of new recruits). | 30% | 41% | 30% |
| I3, R1 | Increase the % of women in the workforce. | 29% | 25% | 29% |
| I3, R1 | Increase the % of female executives (directors and managers). | 30% | 30% | ≥30% |

Note: the objectives derived from the 2024-2028 Strategic Plan for People are also part of the 2024-2028 Sustainability Master Plan and have been included in the "Positive Social Impact" pillar. For more information, see section *1.4.5 2024-2028 Sustainability Master Plan and annual objectives*).

**2 Strengthen the leadership of managers**

- **Description:** Team leaders are one of the key drivers for conveying corporate culture and having a direct impact on employee perception. To achieve this, it is key that managers are aligned with Ence's values and exercise a leadership style that reflects the company's identity and purpose. This approach seeks to consolidate leaders capable of inspiring, accompanying and developing cohesive and high-performing teams.
- **Actions and initiatives:** Ence has defined the key competencies of the "Ence Leader" and has translated them into specific behaviours, complementing this framework with training and coaching programmes to reinforce leadership skills consistent with the corporate culture. In 2025, the "Growing as a team" programme was launched, designed to strengthen shared leadership and cohesion among management teams and middle management, articulated around a learning community that fosters the exchange of experiences, reflection and collaborative learning, consolidating leaders capable of accompanying, developing and coordinating high-performance teams.
- **Related objectives:** The initiatives contribute directly to improving employee perception, reinforcing commitment and internal cohesion. These objectives are related to the first two indicators detailed in core concept 1 (improve eNPS and maintain a low turnover rate, see table above).

**3 Strengthen the brand image and position the company as a benchmark employer.**

- **Description:** To attract and retain talent, the employer brand image needs to be strengthened, with certifications that position Ence as a great place to work for potential employees. These certifications are branding, benchmarking, standardisation and networking tools with which to consolidate the position as a benchmark employer.
- **Actions and initiatives:** Assessment of the criteria and requirements of the Top Employer certification.
- **Related objectives**: maintain the Top Employer certification by improving the score obtained and/or implementing new initiatives that identify Top Employers.

| IRO | Objective | 2025 Objective | 2025 Performance | 2026 Objective |
|---|---|---|---|---|
| I2, R3 | Maintain **Top Employer** certification and improve the obtained score. | Maintain certification (Score: 78). | Obtained certification (Score: 80.80) | Maintain certification |

**4 Improve the efficiency of people management processes and manage through data (People Analytics:**

- **Description:** Ence is committed to the digitalisation and automation of key human capital processes to improve efficiency and promote data-driven decision-making.

- **Actions and initiatives:** In 2025, Ence boosted the digitalisation of people management by activating the **People Analytics module in SAP,** which enables performance reports, 360º assessments and dynamic monitoring of objectives, complemented by dashboards in Power BI to facilitate data-based decisions. The objective management system has been redesigned and a continuous performance module has been implemented to encourage permanent feedback and more effective development conversations. In addition, the strategic project **"The AI 100"** was launched, with 58 initiatives underway aimed at optimising processes, increasing security and improving efficiency, accompanied by massive training in artificial intelligence for the entire organisation, consolidating innovation and digitalisation as key levers. In addition, AI training was conducted for the entire company at basic level, 150 professionals at advanced level and 40 experts in the creation and orchestration of complex agents.

- **Related objectives:** Digitalisation of all core human capital processes by 2028.

The objectives of the Strategic People Plan are integrated into the Sustainability Master Plan and the annual sustainability objectives. These objectives are revised on a monthly basis by the Management Committee and reported to the Board of Directors. The Sustainability Commission reviews the progress of the objectives on a quarterly basis.

## 3.1.4 Dialogue and Participation Processes

Ence believes that fostering open, two-way communication is key to generate trust, transparency and commitment within the organisation. This collaborative approach enables employees to feel heard and valued, facilitates the identification of opportunities for improvement, drives innovation and ensures team alignment with strategic objectives. Dialogue processes are carried out both directly by workers and through their representatives.

### 3.1.4.1 DIRECT DIALOGUE PROCESSES WITH EMPLOYEES

Ence promotes multiple initiatives to strengthen direct communication with employees. These include live online meetings with the Chairperson during quarterly presentations of results and meetings with senior management to listen and share views. "Ence Directo" sessions are also held, where managers from different areas share their management's strategy and objectives. The annual management team meeting was held in 2025 to analyse the context, review the strategy and set guidelines for the coming financial year.

In addition, "One to One" meetings between each employee and their line manager have been enhanced, as well as bi-annual performance and annual performance reviews, encouraging more frequent and effective development conversations.

To guarantee ongoing communication, Ence maintains internal communication channels, such as the AUNA platform, the my Ence app, the corporate intranet and other means of communication such as panels and monitors installed in the company's plants and offices. The company also periodically analyses the organisational climate through the **Great Place to Work** survey, which in 2025 enabled it to revalidate this certification for the sixth consecutive year. The results are communicated to all employees and each department draws up specific action plans to be developed during the year.

On the other hand, in 2025, the Ence Energía y Celulosa S.A. Equality Plan was approved.

### 3.1.4.2 DIALOGUE PROCESSES THROUGH WORKERS' REPRESENTATIVES

Ence maintains a fluid dialogue with workers' representatives through the Works Councils, guaranteeing active participation in decision-making and the search for consensual solutions. The company bases these labour relations on principles of transparency, trust and co-responsibility, applying its labour relations protocol to ensure efficient interaction.

Regular monthly meetings are held with workers' representatives. In this sense, in the 2025 financial year, Ence has held numerous meetings with employee representatives to involve them in management decisions, respond to their concerns, request their participation and gather their proposals to integrate them in the company's strategy. An example of this is the meetings held regarding the drafting of the new Equality Plan for Ence, CEASA and Magnon, where a specific committee was set up with representatives of the company and workers' representatives. And the meetings held with Works Councils and trade union representatives as part of the restructuring process *(see section on **Efficiency and Competitiveness Plan**)*.

The Human Capital Directorate is involved in dialogue and negotiation with workers' representatives, whose main duties are:

1. **Collective bargaining:** Participate in the negotiation of collective agreements to agree on fair and equitable working conditions
2. **Consultation and Communication:** Maintain an open communication channel with workers' representatives to discuss relevant issues and make informed decisions.
3. **Conflict Resolution:** Collaborate in the resolution of labour disputes in a proactive and constructive manner.

The General Director of Human Capital who leads the negotiations on behalf of the company, guaranteeing, through her status as a member of the Management Committee, that the issues addressed are passed on to this decision-making body of the company.

To ensure that the dialogue process is efficient, in addition to allocating human resources, Ence uses external tools to analyse the organisational climate, such as the Great Place to Work survey and the Top Employer certification mentioned above.

In terms of **workers' rights**, Ence strictly complies with legislation, and given that it operates in Spain and Portugal where there are robust regulatory frameworks and government control systems, the risk of infringement of worker conditions and human rights is very low.
Moreover, Ence's Code of Conduct expressly recognises the rights of workers Ence's Sustainability Policy includes the company's express commitment to respect human rights and specifically the rights of workers as set out in the ILO Declaration on Fundamental Principles and Rights at Work and its agreements (see section ***3.1.2 Policies related to in-house employees***).

As a result of the social dialogue between Ence and workers' representatives, Ence has several collective bargaining agreements that regulate employee working conditions such as wages, working hours, holidays and other employee rights and obligations. The main agreements in force are:

1. Collective Bargaining Agreement of CEASA Bio-factory in Navia
2. Collective Bargaining Agreement of Ence Energía y Celulosa, S.A. Bio-factory in Pontevedra
3. Collective Bargaining Agreement of Ence Energía y Celulosa, S.A. Madrid Offices
4. Collective Bargaining Agreement of Ence Energía y Celulosa, S.A. Pontevedra Offices
5. Collective Bargaining Agreement of Ence Energía y Celulosa, S.A. Navia Offices

Ence is also represented by several trade unions at its work centres, which actively participate in the dialogue processes.

**Efficiency and Competitiveness Plan**

In the last quarter of 2025, and after four consecutive quarters of losses, Ence announced the implementation of an **Efficiency and Competitiveness Plan**. The Plan will be implemented in the 2025-2027 period and is based on two pillars: on the one hand, the adoption of Artificial Intelligence solutions and process re-engineering and automation, and on the other hand, the rationalisation of its operational processes. The implementation of the projects of which this plan is composed will entail an orderly reduction of its staff structure in the framework of a collective redundancy procedure to be implemented until 2027.

These job amortisations require upfront investments to automate tasks or improve current processes, some of which have been made during 2025.

In this context, in December 2025, Ence reached an agreement with the legal representatives of the workers in the framework of the collective redundancy procedure for the Pontevedra bio-factory work centres, the central offices in Galicia and the central offices in Navia and Madrid. The agreement provides for the termination of employment contracts for up to 57 people, establishing that the execution of the termination measures may be carried out between 1 January 2026 and 31 December 2027.

### 3.1.4.3 Integrity Line

Moreover, in addition to the dialogue mechanisms outlined above, Ence provides its employees with mechanisms whereby they can **confidentially report** practices that do not comply with the principles established in the Code of Conduct and the company's other internal rules, such as the company's ***Integrity Line.***

The Channel is available to all Ence employees or third parties who collaborate with the company. In 2025, there have been no confirmed cases and no fines or sanctions related to discrimination or human rights violations of in-house employees. In 2025, 6 cases related to discrimination/harassment were reported. For more information on the line and the procedure for managing and responding to communications, as well as the monitoring and reporting mechanisms and how Ence ensures that stakeholders are aware of the line, see section ***Integrity Line***.

This channel can help mitigate the negative impacts reported under ***3.1.1.1 Impacts.***

## 3.1.5 Characteristics of the workforce[26]

### 3.1.5.1 WORKFORCE PROFILE

In the 2025 financial year, the average workforce of the Group was 1,305.2 people, ending the financial year with 1,342[27] people in the workforce. The following tables include the breakdown by gender and country.

| Gender | Number of employees | |
|---|---|---|
| | 2024 | 2025 |
| Man | 907 | 1,008 |
| Woman | 338 | 334 |
| Other | - | - |
| Not notified | - | - |
| TOTAL | 1,245 | 1,342 |

| Gender | Number of employees | |
|---|---|---|
| | 2024 | 2025 |
| Spain | 1,241 | 1,338 |
| Portugal | 4 | 4 |
| TOTAL | 1,245 | 1,342 |

In ***Appendix III Environmental and social indicators - Workforce profile*** a breakdown of the workforce by professional group, age, gender, country is included.

26. Note on quantitative information related to the workforce: Ence reports the information at the end of the financial year (31/12/2025) and in number of people, as the difference between the mean workforce data and year-end data is less than 5%, so both data reflect equivalent and very similar information. With the exception of the rotation rate, family leave and performance appraisals which are Calculated on the basis of the average number of staff members in order to take into account staff fluctuations during the reference period.
27. Information on the total number of employees at year-end and the average number of employees is included under section "11.1 Workforce data" in the Consolidated Annual Accounts for 2025.

### 3.1.5.2 QUALITY EMPLOYMENT

By the end of the 2025 financial year, among Ence's employees, 95% have a permanent contract and 97% work full time. The following tables include the breakdown by type of contract, working hours, gender and country.

| Number of employees by type of contract | | | | |
|---|---|---|---|---|
| Woman | Man | Other | Not notified | Total |
| **2025** | | | | |
| **Number of employees** | | | | |
| 334 | 1,008 | - | - | 1,342 |
| **Number of permanent employees** | | | | |
| 312 | 959 | - | - | 1,271 |
| **Number of contractors** | | | | |
| 22 | 49 | - | - | 71 |
| **Number of employees with non-guaranteed hours (1)** | | | | |
| - | - | - | - | - |
| **Number of full-time employees** | | | | |
| 310 | 993 | - | - | 1,303 |
| **Number of part-time employees** | | | | |
| 24 | 15 | - | - | 39 |

| Number of employees by type of contract | | | | |
|---|---|---|---|---|
| Woman | Man | Other | Not notified | Total |
| **2024** | | | | |
| **Number of employees** | | | | |
| 338 | 907 | - | - | 1,245 |
| **Number of permanent employees** | | | | |
| 303 | 866 | - | - | 1,169 |
| **Number of contractors** | | | | |
| 35 | 41 | - | - | 76 |
| **Number of employees with non-guaranteed hours (1)** | | | | |
| - | - | - | - | - |
| **Number of full-time employees** | | | | |
| 320 | 891 | - | - | 1,211 |
| **Number of part-time employees** | | | | |
| 18 | 16 | - | - | 34 |

(1) Ence has no employees with non-guaranteed hours. Non-guaranteed hourly wage earners are company employees without any guarantee of a minimum or fixed number of working hours.

| Number of employees by type of contract and country | | |
|---|---|---|
| Spain | Portugal | Total |
| **2025** | | |
| **Number of employees** | | |
| 1,338 | 4 | 1,342 |
| **Number of permanent employees** | | |
| 1,267 | 4 | 1,271 |
| **Number of contractors** | | |
| 71 | 0 | 71 |
| **Number of employees with non-guaranteed hours (1)** | | |
| - | - | - |
| **Number of full-time employees** | | |
| 1,299 | 4 | 1,303 |
| **Number of part-time employees** | | |
| 39 | 0 | 39 |

| Number of employees by type of contract and country | | |
|---|---|---|
| Spain | Portugal | Total |
| **2024** | | |
| **Number of employees** | | |
| 1,241 | 4 | 1,245 |
| **Number of permanent employees** | | |
| 1,165 | 4 | 1,169 |
| **Number of contractors** | | |
| 76 | 0 | 76 |
| **Number of employees with non-guaranteed hours (1)** | | |
| - | - | - |
| **Number of full-time employees** | | |
| 1,207 | 4 | 1,211 |
| **Number of part-time employees** | | |
| 34 | 0 | 34 |

(1) Ence has no employees with non-guaranteed hours. Non-guaranteed hourly wage earners are company employees without any guarantee of a minimum or fixed number of working hours.

Ence's commitment to generating stable quality employment has translated yet again into low staff turnover with a turnover raten[28] at group level has been 0.5. In 2025, there were a total of 620 terminations[29], of which 21 were dismissals. Most of these absences correspond to temporary hires, which are made to cover maternity/paternity leave, IT, absenteeism, specific situations such as annual technical stoppages, etc. Absenteeism in 2025 was 6.89% (151,732 hours) versus 5.77% in 2024 (124,217 hours), including illness, occupational accidents, maternity/paternity, and paid and trade union leave.

*Appendix III Environmental and social indicators - Quality employment* includes details of the *Workforce by contract type and Workforce by workday type* breakdown by age, gender, country. The *Turnover rate* and *Redundancies* breakdown is also included.

28. Turnover rate = (No. of total departures) / average workforce. The total number of departures includes resignations, dismissals, retirements, and if any, deaths in service.
29. The total number of departures includes resignations, dismissals, retirements, and if any, deaths in service.

## 3.1.5.3 MANAGING, ATTRACTING AND RETAINING TALENT

Talent management is key at Ence, which seeks to attract, develop and retain the professionals necessary for its growth and diversification. To this end, the company has designed a comprehensive value proposition that encompasses all aspects of the employees' work experience: competitive compensation, professional development, active work-life balance and equality policies, and a safe and motivating environment.

### Attracting talent

To manage human capital effectively, Ence starts by attracting the talent needed to foster growth and develop new business lines, which are strategic objectives of the company. It identifies critical profiles according to its strategy and designs value propositions adapted to each one, prioritising the incorporation of local talent as part of its commitment to the development of the communities where it operates.

Among the most outstanding initiatives is the **Talent Programme**, which facilitates access to employment and professional development for young recent graduates through scholarships and internships in different areas of the company. Each participant has a mentor who follows their onboarding, monitors their learning and evaluates their performance. In 2025, 16 interns participated (5 men and 11 women), 14% joined the workforce at the end of their internship.

Once they become employees, they access an Induction Plan that includes initial training, adherence to internal rules of conduct, and where appropriate, an immersion programme and visits to the facilities to familiarise them with operation processes.

Laura Prado, Noemí Abalo, Uxía Barreiro, Alfonso Bea and Patricia Iglesias on the day of the Exhibition of their projects of the X Talent Programme.

### Training and professional development

*Training*

The development of staff competencies is another key pillar of talent management. To this end, Ence draws up annual training plans based on an analysis of the needs of its workforce, also including the training needs identified in the employees' individual development plans and the needs arising from the Strategic Framework for growth and diversification.

These activities are included in policies such as the Management Policy, which actively promotes awareness and ongoing training of each employee, providing the required knowledge, procedures and resources for efficient and quality performance. It also encourages the participation of employees so that their skills, knowledge and experience are shared for the benefit of the whole organisation.

Furthermore, the Sustainability Policy and the Diversity and Equal Opportunities Policy ensure equal access to training without discrimination based on gender or other personal conditions, and promote work-life balance with the training opportunities offered by the company.

In 2025, the Ence Group provided a total of 28,549 hours of training, equivalent to 21.87 hours of training per employee. Although a specific training plan with particular courses is defined each year, the training activities are grouped into 7 large areas, aligned with Ence's strategic priorities:

- ENVIRONMENTAL AWARENESS
- REGULATORY COMPLIANCE
- LEADERSHIP DEVELOPMENT
- HEALTH AND SAFETY
- SUSTAINABILITY
- OPERATION AND MAINTENANCE TECHNIQUE
- DIGITAL TRANSFORMATION

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Training categories 2025

| Training | Participants | Hours |
|---|---|---|
| Operation and maintenance technique | 1,064 | 9,202.0 |
| Occupational health and safety | 861 | 6,880.5 |
| Regulatory compliance | 1,179 | 5,642.5 |
| Digital transformation | 783 | 3,805.0 |
| Leadership development | 279 | 1,999.0 |
| Environmental awareness | 843 | 672.5 |
| Sustainability | 224 | 347.0 |
| **Total** | **5,233** | **28,548.5** |

***Appendix III Environmental and social indicators - Training and professional development*** includes the breakdown of average training hours by gender and professional category.

*Professional development*

After integration into the company, Ence encourages the professional development of its staff so that they can reach their full potential. This strengthens the attractiveness of the project, fosters pride of ownership and promotes talent retention.

Ence applies two complementary tools to manage talent development: the Career Plan, which is defined jointly with the employee and has a long-term focus, and the Individual Development Plan, which is established with an annual horizon. Once a year, the employee has a development interview with their manager, in which career and individual development plans are reviewed, the annual performance evaluation is shared, the achievement of individual objectives is reviewed, alignment with corporate values is analysed and the necessary reinforcements or training actions are proposed. In addition to the evaluation by supervisors, the performance management model is supplemented by feedback from peers and employees (360° Feedback).

In 2025, the performance assessment has been updated to respond to current trends and business needs, incorporating six key competencies around technical excellence, sustainability and innovation. These competences are: technical competence; results orientation and accountability; critical thinking and problem solving; adaptability and change management; digital and technological competence; and effective communication and collaboration.

In 2025, Ence Group carried out a total of 955[30] performance evaluations and Individual Development Plan (IDP) interviews (73% of the total workforce), having evaluated 100% of employees in individual contracts and directors, and 50% of staff covered by the collective agreement.

| % of the average staff who have received performance evaluations and IDP 2025 | Man | Woman | Total |
|---|---|---|---|
| Total % of Average Staff | 72% | 76% | 73% |
| Managers and individual contract (%) | 100% | 100% | 100% |
| Staff covered by collective agreement (%) | 53% | 38% | 50% |

*Appendix III Environmental and social indicators - Training and professional development* includes a breakdown of performance appraisals by gender and job category.

Ence uses other tools to foster talent development, including corporate leadership, coaching, mentoring and management development programmes, as well as external management development and other training.

Another key aspect of career development management is the promotion process. Ence seeks to balance external recruitment with the promotion of internal talent, offering growth opportunities to its employees. This fosters motivation, pride of belonging and commitment to the company. Ence posts internal vacancies in its communication channels with employees, and by 2025, it proposed to cover at least 30% of the number of vacancies filled by internal promotions with respect to the number of new recruits, closing the year with a figure close to 41%. In 2025, there were 57 internal promotions, of which 24 were for women. In addition, Ence informs the entire organisation of internal promotions to highlight its commitment to its human resources.

### Remuneration

Ence includes competitive and attractive remuneration policies for employees with individual contracts in its talent management. In determining the elements of remuneration, the duties of each position and the value that each person brings according to their profile and experience are considered, within a structure of salary levels and bands that is transparently communicated to all staff. The remuneration established by collective agreement serves as a guaranteed minimum for staff on individual contracts. In addition, variable remuneration is linked to the achievement of personal, organisational and business objectives, including sustainability aspects (see section *1.4.1.1 Sustainability objectives linked to variable remuneration*).

Salary reviews for individual contract employees at Ence are carried out with the objective of guaranteeing internal equity and external competitiveness. To this end, Ence relies on the merit matrix, based on the positioning of each employee's salary band and their performance.

For employees subject to collective bargaining agreements, the agreed remuneration and pay structures are set out in the respective agreements in accordance with the legislation in force.

In all cases, for 100% of Ence employees, the starting salary of the lowest professional category is higher than the minimum wage applicable in Spain and Portugal. In 2025, the proportionality has been as follows:

**Proportionality between the IMW and lower-level salary at Ence**

| | 2024 | 2025 |
|---|---|---|
| **Spain** | | |
| **Men** | 1.30 | 1.13 |
| **Women** | 1.28 | 1.42 |
| **Portugal** | | |
| **Men** | 2.83 | 1.74 |
| **Women** | 2.83 | 1.72 |

In 2025, the average effective remuneration, excluding the Management Committee, was €69,082 per year, including fixed and variable remuneration.

| Average remuneration (€) (1) (2) | 2024 | 2025 |
|---|---|---|
| Total average remuneration | 70,251 | 69,082 |

(1)The average remuneration data include all Ence Group employees with an employment contract. The CEO is not included as his relationship with Ence is not governed by an employment contract, but by a commercial contract.
(2)In order to preserve confidentiality, the average remuneration breakdowns by age and professional category included in the Appendix also do not include the average remuneration of employees in Portugal due to their low representativeness (4 employees in 2024 and 2025).

The methodology for calculating average pay and the pay gap adapts to the requirements established by the Sustainability Reporting Directive (CSRD). For more details on the methodology followed, see section *Pay gap.*

*Appendix III Environmental and social indicators - Remuneration* includes a breakdown of remuneration by gender, age and professional category.

### Pay gap

Regarding remuneration, Ence is committed to eliminating the gender pay gap and ensuring that there is no gender bias. In order to comply with this principle, Ence monitors pay differentials between current job groupings according to their professional category and job value in the organisation in order to eliminate them.

The quantification methodology complies with the requirements of the Directive 2022/2464 on corporate sustainability reporting, applying the following formula:

**Pay gap = [(Average gross hourly pay level of male employees – average gross hourly pay level of female employees) / Average gross hourly pay level of male employees] x 1,000**

30. This includes the total number of performance appraisals (615) and Individual Development Plan (IDP) interviews (340) carried out during 2025 for staff, including managers, individual contract staff and contract staff. (

In order to be able to compare remuneration between employees, all wage and salary concepts of all employees registered at the end of the reporting period are considered. To equalise, the salaries of employees who, due to their contractual situation, have not had an employment relationship with Ence throughout the year are extrapolated to annualised totals, employees who had partial working hours or reductions are taken to 100% of the working hours and for those who were on sick leave the salary conditions are taken as if they were no longer on sick leave. In addition, items that are eligible for equalisation are carried at 100% of the salary conditions, and one-off payments are maintained as paid. For the calculation of gross hourly wages, depending on the work centre of each employee, the number of hours worked is assigned to each employee. From this data, the average for men and women is calculated applying the formula described above. For the purposes of the calculation, employees are considered to be all persons whose conditions are covered by any type of employment contract. The Managing Director is not included in the calculation because he is not a salaried employee as he has a commercial contract instead of an employment contract.

In 2025, the total gap calculated according to this methodology has been 4.9% at Group level. The gap results, also broken down by occupational category, are presented below:

| ENCE Group Pay gap (%)(1) | 2024 | 2025 |
|---|---|---|
| Senior Management (2) | 41.0% | 48.9% |
| General management | -3.4% | 5.3% |
| Managers | 1.8% | 2.7% |
| Technicians | 10.6% | 10.0% |
| Team managers | 0.6% | 10.2% |
| Operators | 31.2% | 19.8% |
| Maintenance | 50.7% | 35.0% |
| Support and improvement | 1.4% | 14.3% |
| Clerical workers | 0.7% | 2.6% |
| TOTAL | 10.3% | 4.9% |

(1) In order to preserve confidentiality, the breakdowns do not include the average remuneration of employees in Portugal due to their low representativeness (4 employees in 2024 and in 2025). The Managing Director is not included in the calculation because he is not a salaried employee as he has a commercial contract instead of an employment contract.
(2) Senior Management includes the Management Committee, the Internal Auditing Director and the Ethics and Compliance Director.

In the 2025 financial year, the pay gap at Group level evolved favourably, reflecting progress in the Group's commitments to equality and responsible management of human capital. This improvement is mainly associated with the internalisation of a relevant group for the activity of the power plants, in particular the operating and maintenance personnel, whose incorporation has had a positive effect on the overall structure of the workforce and on the aggregate indicators.

In addition, the Group continues to develop and implement measures aimed at further reducing the pay gap, integrating them into its sustainability strategy and its people policies, in order to ensure pay equity and equal opportunities.

The analysis by organisational level shows that positions of greater responsibility (senior management) show greater variability in the indicators, in line with the complexity and scope of these functions. This aspect is continuously monitored by management as part of the Group's policies of good governance, transparency and talent development.

### Compensation ratio

The ratio of total annual compensation of the highest paid person to the average workforce in 2025 was 19.9 times.

### Remuneration by gender on the Board of Directors

In the case of members of the Board of Directors, remuneration is governed by the principles of Directors' Remuneration Policy, which applies to all Directors without distinction as to gender or other personal circumstances. Variations in annual remuneration are based solely on objective criteria established by this Policy, such as their participation in various Board Committees or their role as Chair of one of them.

**Remuneration of the Board of Directors - Total average(1)**

| Period | 2024 | 2025 |
|---|---|---|
| Men | €100.8M | €101M |
| Women | €106M | €109.8M |

(1) For the calculation of the mean remuneration, fixed remuneration, allowances and indemnities and the payment of long-term savings schemes have been taken into account, but variable remuneration has not been taken into account, as it is only received by the Chairperson for their executive duties and not for their status as a director. It also does not include the Chairperson's remuneration for executive functions. The individual remuneration of each Board member may be consulted in Ence's Annual Remuneration Report.

## 3.1.6 Diversity and equal opportunities

Equal opportunities and the rejection of any type of discrimination in the management of the human team are firm commitments set out in Ence's Code of Conduct. Beyond regulatory compliance, the company sees diversity as a strategic lever for generating value by providing different perspectives that enrich decision-making and foster innovation. Ence's principles in this matter are defined in the **Diversity and Equal Opportunities Policy**, approved by the Board of Directors and publicly available to all the company's stakeholders in its website (see section *3.1.2 Policies related to in-house employees*).

### 3.1.6.1 EQUALITY STRATEGY AND OBJECTIVES

Ence's Equality Policy establishes a number of commitments that are materialised in the equality objectives defined in the 2024-2028 Sustainability Master Plan and in the annual sustainability objectives established each year on the basis of the framework objectives set out in the Plan (see section *1.4.5 2024-2028 Sustainability Master Plan and annual objectives*).

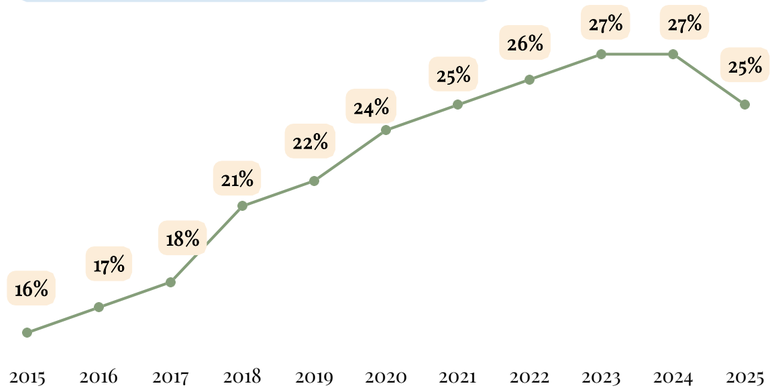
**Equality objectives**

| Line of action | 2025 Objective | 2025 Performance | 2026 Objective |
|---|---|---|---|
| Increase the % of women in the workforce | 29% | 25% | 29% |
| Increase the % of female executives (directors and managers) | ≥30% | 30% | ≥30% |

The annual objectives are reviewed monthly by the Management Committee and the Board of Directors, in addition to a detailed quarterly review by the Board's Sustainability Commission.

The body in charge of defining the objectives and designing complementary measures to promote equality and diversity is the **Technical Commission for Equality**, in which managers from the areas of cellulose, renewable energies, forestry heritage, sustainability and human capital participate. The Commission meets regularly to follow up on measures, plans and objectives.

**Evolution of the presence of women at Ence**




All the initiatives implemented by Ence to promote equality have resulted in a significant increase in the presence of women in the workforce in recent years. By the end of 2025, the percentage of women in the workforce decreased slightly to 25%.

In 2025, the company approved the Ence Energía y Celulosa S.A. Equality Plan, which incorporates specific measures to guarantee fairness in selection, promotion, training and work-life balance processes, as well as actions to promote diversity in positions of responsibility and on the Board of Directors.

Ence also participates in forums and events to give visibility to female talent; an example of this is the participation of the director of the Pontevedra bio-factory in the second edition of the Women's Entrepreneurship Awards, an initiative of the Diario de Pontevedra, held in 2025.

### 3.1.6.2 DIVERSITY INDICATORS

At the end of 2025, the percentage of women in the workforce was 25%. In terms of Senior Management[31], the representation of women was 30%.

| Senior Management | | |
|---|---|---|
| Gender | Number of employees | % |
| Men | 7 | 70% |
| Women | 3 | 30% |
| Total | 10 | 100% |

As for the distribution by age bracket, the data for the last two years are presented below:

| Number of employees | | |
|---|---|---|
| Age: | 2024 | 2025 |
| Up to 30 years old | 110 | 115 |
| From 31 to 50 years old | 863 | 898 |
| Over 50 years old | 272 | 329 |
| Total | 1,245 | 1,342 |

### 3.1.6.3 WORK-LIFE BALANCE

Work-life balance is a key principle in Ence's Diversity and Equal Opportunities Policy. In this sense, Ence implements measures which promote flexible working hours, digital disconnection, optimisation of the meeting schedule and working from home.

Ence also offers its employees benefits in addition to those required by law, such as breastfeeding leave that can be accumulated into full working days, maternity leave cover, part-time maternity leave and the promotion of online meetings to avoid commuting.

31. Senior Management comprises the Management Committee, the Internal Audit Directorate and the Ethics and Compliance Department. The Management Committee is formed by the Managing Director, the General Managers of the business areas, and the General Managers of the related corporate areas.

Ence's value proposition for staff who are not under the collective bargaining agreement also includes a working hours policy that enables greater time flexibility, enabling employees to organise their working hours according to their needs. For certain positions, Ence also offers the possibility of working from home up to two days a week, thus facilitating the work-life balance. Updates to this policy are communicated to employees on Ence's internal communication channels.

As required by Spanish law, 100% of Ence employees are entitled to several types of leave for family reasons, such as maternity leave, paternity leave or leave to care for family members in the event of an accident, serious illness, hospitalisation or surgery. In 2025, 25%[32] of the average workforce took some of these leaves. Among the employees who took leave, 27% were women and 73% were men.

### 3.1.6.4 PERSONS WITH DIFFERENT ABILITIES

The inclusion of people with different abilities in the workplace is another of the commitments included in Equality and Diversity of Opportunities Policy. Ence develops specific plans for their effective integration by eliminating physical barriers and adapting the work. In 2025, Ence had 14 employees with different abilities[33], providing all the necessary resources and conditions to ensure their accessibility and enable them to perform their duties properly.

**Employees with different abilities**

| Gender | 2024 | | 2025 | |
|---|---|---|---|---|
| | Number | % of total staff | Number | % of total staff |
| Man | 8 | 0.64% | 12 | 0.89% |
| Woman | 3 | 0.24% | 2 | 0.15% |
| Total | 11 | 0.88% | 14 | 1.04% |

Ence promotes the employment inclusion of people with disabilities through direct hiring and the generation of indirect employment through agreements with foundations and special employment centres, in compliance with the General Disability Act. It collaborates with the Adecco Foundation in helping families and awareness campaigns, and supports innovative projects such as IN-Down (University of Vigo), which uses immersive technology to improve the skills of people with Down's Syndrome, and Natura XXIII (Fundación Juan XXIII), aimed at training and employment in environmental activities. In addition, it continues to collaborate with ADINORA in social integration, speech therapy and physiotherapy services. These initiatives reflect Ence's commitment to equal opportunities and improving the quality of life of people with disabilities.

## 3.1.7 Workers' rights

### 3.1.7.1 RIGHT TO ASSOCIATION AND COLLECTIVE BARGAINING AND SOCIAL DIALOGUE

At the end of 2025, 58% of the workforce has a contract linked to a particular collective bargaining agreement. However, all Ence employees, regardless of whether they are covered by collective bargaining agreements or individual contracts, are subject to the collective bargaining agreements of the different work centres, and where applicable, the relevant industry or provincial agreements.

Ence is represented by several trade unions at its work centres, which actively participate in the dialogue processes[34].

| Coverage rate | Collective bargaining coverage | | Social Dialogue (Workers' Representation) |
|---|---|---|---|
| | Employees - EEA | Employees - Non EEA | |
| 0%-19% | - | N/A | Portugal |
| 20%-39% | - | N/A | - |
| 40%-59% | - | N/A | - |
| 60%-79% | - | N/A | - |
| 80%-100% | Spain / Portugal | N/A | Spain |

**2025 Workforce percentage by type of group, gender and country**

| Type of group | Spain | | Portugal | |
|---|---|---|---|---|
| | Men | Women | Men | Women |
| Individual contract | 64% | 36% | 75% | 25% |
| Collective bargaining agreement | 83% | 17% | 0% | 0% |
| **Total** | **75%** | **25%** | **75%** | **25%** |

### 3.1.7.2 WELFARE PLANS

All Ence employees are covered by the benefits established in the national legislation on social protection in the countries where it operates (Spain and Portugal), including benefits for leave due to accidents, sick leave, maternity/paternity leave, retirement or unemployment benefit.

In addition to these public programme benefits, Ence completes its value proposition for employees with a number of social benefits designed to adapt to the needs of each person and guarantee social protection that goes beyond the strictly legal requirements. These benefits apply to full-time, part-time and temporary employees and include a pension plan and life and accident insurance, to protect the employee and their family in all circumstances.

Depending on the applicable bargaining agreement and the work centre, Ence also offers other social benefits such as the flexible remuneration plan, medical insurance, the supplementary benefit for situations of temporary incapacity or the factory restaurant/canteen card.

32. *This includes employees who are or have been in the workforce during the reporting period (excluding Interns, Partial Retirees and Directors).*
33. *Persons with different abilities are persons with disabilities according to the definition of the Royal Legislative Decree 1/2013. According to this Act, persons with disabilities are those who have physical, mental, intellectual or sensory impairments, which are expected to be permanent, and which in interaction with various barriers may prevent their full and effective participation in society on an equal basis with others. The Act also establishes that persons with disabilities are those who have been granted a degree of disability equal to or greater than 33%. These definitions have been taken into account in the data collection methodology.*
34. *Ence has no employee representation on European Works Councils, Societas Europaea (SE) Works Councils or European Cooperative Society (ECS) Works Councils.*

## 3.1.8 Health and safety

Ence's main strategic priority is to guarantee the health safety of everyone involved in its operations, whether they are direct employees or contractors. That is why the company is committed to providing all the necessary resources to carry out its activities safely. With the ultimate aim of achieving zero accidents in its operations, Ence has implemented and is working to improve the management systems and the implementation of innovative tools.

For the report on the health and safety management model and its performance, which is linked to the objective of minimising the potential for workplace accidents (see section ***3.1.1. Impacts, risks and opportunities***), Ence structures the information around the key aspects governing the safety culture: Structure and Governing Bodies; Policies and Principles of Action; Occupational Risk Prevention Management Model; Training; Performance; and Welfare.

### 3.1.8.1 GOVERNING BODIES AND STRUCTURE

Health and safety management at Ence is organised through a **Joint Prevention Service (JPS)**, which assumes the preventive specialisation areas of safety at work, ergonomics and applied psycho-sociology; and occupational health; and outsources the health surveillance function. The JPS covers 100% of the workforce.

At the level of **governance bodies**, the **ELSE Committee** (Equipo de Liderazgo en Seguridad, Safety Leadership Team), IS a decision-making body that periodically reviews safety performance and improvement initiatives. It also approves standards regarding security. This committee is made up of: the Chairperson, the General Managers of Cellulose and Magnon, the Internal Auditing Director, and the Security Managers of the different Business Units.

### 3.1.8.2 HEALTH AND SAFETY POLICY AND PRINCIPLES OF ACTION

Ence sets out its principles of action in its **Health and Safety Policy**. It also defines the governance bodies and their respective responsibilities in relation to the definition, implementation and compliance with the principles set out in the policy. This policy is available to all stakeholders on the website (see section ***3.1.2 Policies related to in-house employees***).

Health and safety are key principles in Ence's Code of Conduct. The company considers it a staff right and a way to improve the working environment and competitiveness.

The **cross-cutting approach to safety culture** ensures that all levels of the company adopt safe behaviours as the norm, which fosters operational discipline and leads to excellence. This culture focuses on:

**Culture of safety**

**1 Management leadership and responsibility:** visible commitment of management and the entire chain of command to safety, exemplary in daily management.
**2 Business integration**: integration of security in all processes as a key factor in decision-making.
**3 Accident prevention**: the constructive investigation of all accidents and incidents by implementing measures to prevent recurrence and sharing lessons learned.
**4 Training and education**: ongoing training for all employees to ensure that they are sufficiently trained to work safely.
**5 Audit and ongoing improvement**: application of the PDCA (Plan, Do, Check, Act) ongoing improvement cycle by continuously auditing to monitor if security plans and procedures are understood and executed.
**6 Safety as a right and an obligation**: Safety is not only an employee's right, but also an obligation, as all employees are responsible for their own safety and that of the people around them.

35. The JPS management model is aligned with the requirements of Royal Decree 39/1997, which implements the Prevention Services Regulations and Act 31/1995 on the Prevention of Occupational Risks.

### 3.1.8.3 RISK PREVENTION AND MANAGEMENT MODEL

The health and safety management system applies to 100% of employees and is governed by the ISO 45001:2018 standard; all industrial operations centres within the pulp business and biomass power plants are certified. This management model, which is subject to annual internal and external audits, includes procedures to prevent occupational risks associated with tasks and working conditions, providing tools that ensure safe workplaces. These include the following:

**Standard Operating Procedures (SOPs)**

These describe the tasks to be carried out for routine operations, their sequence, as well as the points of special attention from a safety perspective, the main risks of the operation and the associated preventive measures.

**Work permits**

For non-routine operations, the work permits must be formalised. These permits include an assessment of the risks associated with the task, as well as with the process and facility conditions, and the preventive measures to mitigate them, in addition to the agreement of all parties involved as regards their understanding and acceptance prior to execution.

**Pre-access information**

It is mandatory for all persons entering the facilities to receive information beforehand on the risks of the facilities, how to prevent them and the centre's emergency plan. In addition, contractors follow an approval protocol to ensure that they may carry out the contracted work safely and in compliance with the requirements associated with the Coordination of Business Activities regulations.

**Meetings with contractors**

Ence organises regular meetings with its main contractors to coordinate and work together in order to improve safety. Contractors are also assessed on their safety performance and this assessment is taken into account in contract renewals.

**Particularly Hazardous Work (PHW)**

For any operations which, due to their casuistry, may pose a special safety risk, Ence has established an additional control procedure. This calls for specific and coordinated planning of work by all parties involved, reflected in a step-by-step procedure which describes: work sequence, risks at each stage and preventive measures. In addition, the safety team provides reinforced supervision during operations.

**Preventative Safety Observations (PSO)**

These are exercises to monitor the execution quality of safety work in order to detect unsafe actions and conditions and to correct them in a constructive manner, as well as to recognise and disseminate good practice.

**Second party cross audits**

In addition to certification audits and mandatory regulatory audits, Ence has established a programme of internal second-party audits conducted by specialised safety and operational auditors who are appointed by the organisation, and whose results of which are reported to the Board of Directors. This system is beneficial to audit process as internal auditors can gain a deeper understanding of Ence's culture, management tools, industrial process and work procedures.

### 3.1.8.4 HEALTH AND SAFETY TRAINING

Health and Safety training is a key instrument in preventive action, promoting a culture of safety in the company and thus protecting the worker against possible risks. For this reason, Ence has designed a training itinerary for all the profiles, in which the specific training actions required are defined according to their risk group. A total of 6,880.5 hours of health and safety training were provided in 2025. It also requires initial training in the risks and preventive measures characteristic of our business, as well as in emergency plans, for any contractor who is going to work for Ence.

### 3.1.8.5 OBJECTIVES AND PERFORMANCE

Ence has the goal of achieving zero accidents in all its operations, extending this vision not only to its employees, but also to its contractors. Consequently, the security objectives also apply to all external staff.

In addition, specific voluntary targets have been defined within the 2024-2028 Sustainability Master Plan:

**2024-2028 Health and Safety Targets**

| Business line | Pulp | Forestry | Power Plants |
|---|---|---|---|
| Frequency Index (1) | 2.48 | 9.44 | 2.97 |
| Severity Index (2) | 0.142 | 0.489 | 0.07 |

(1) Frequency index = Accidents involving in-house staff and contractors * 106) / Hours worked by in-house staff and contractors; (2) Severity index = Days lost (working days) due to accidents involving in-house staff and contractors * 103) / Hours worked by in-house staff and contractors

**2025 Performance**

| Business line (1) | Pulp | Forestry | Power Plants |
|---|---|---|---|
| Frequency Index | 3.24 | 4.43 | 8.47 |
| Severity Index | 0.150 | 0.306 | 0.735 |

(1) Pulp: includes cellulose business (bio-factories); Energy: includes energy business (independent power plants); Forestry: includes Forestry procurement, Heritage and Biomass supply; Forestry: includes Forestry procurement, Heritage and Biomass supply

These objectives are aimed at reducing the negative impact of Ence's operations on the health and safety of its in-house staff and external personnel. They are set for 2024-2028 and include the three main business lines (Pulp, Forestry and Power Plants). Ence's historical values and the industry's main reference values have been taken into account in defining the objectives.

Security performance is monitored through two types of indicators:

***Lagging indicators[36]***

Accident-related outcome/retrospective indicators

- Frequency Index (FI)
- Severity Index (SI)
- Number of accidents
- Calendar days lost
- Occupational diseases

***Leading indicators***

Early/prospective indicators assessing proactive prevention activities

- number of OPS and their quality.
- number of audits carried out and progress of action
- plans. number of incidents analysed
- Number of emergency drills

In 2025, the Pulp business has started the execution of its strategic plan (2024-2026) to implement the SPM - Safe Process Management culture in its two bio-factories and avoid serious accidents that could affect people, the environment, reputation and assets of the company.

In the energy segment, an action plan was launched in 2025 focused on improving safety leadership and reinforcing critical procedures through a training plan. A special effort has been made to manage the most important risks: accidents in the plant and fire prevention.

In the forestry area, the implementation of a practical workshop in the woodland, to learn about safe felling and cutting procedures, facilitating access to training for chainsaw operators in safety aspects that help them to avoid one of the main causes of accidents in the forestry area.

The key performance indicators for 2025 are set out below.

**Accidents**

In 2025, the number of accidents with and without sick leave decreased by 15% compared to the previous year, with no fatal accidents among both in-house and external staff. Whenever an accident or incident is recorded, and based on the corresponding corporate procedure, it is investigated, with an exhaustive analysis of causes until the root cause is identified, the definition of corrective actions to mitigate it and preventive actions to avoid its repetition, recorded and communicated, in order to disseminate the main lessons learned. The accident and incident database is one of the main sources of information and analysis for building the annual Safety FMOs. The number of calendar days lost due to accidents with sick leave amounted to 735 for in-house staff and 1,281 for external staff.

*Appendix III Environmental and social indicators - Accidents* includes a breakdown of accidents by gender, in-house staff and contractors.

**Accident rates**

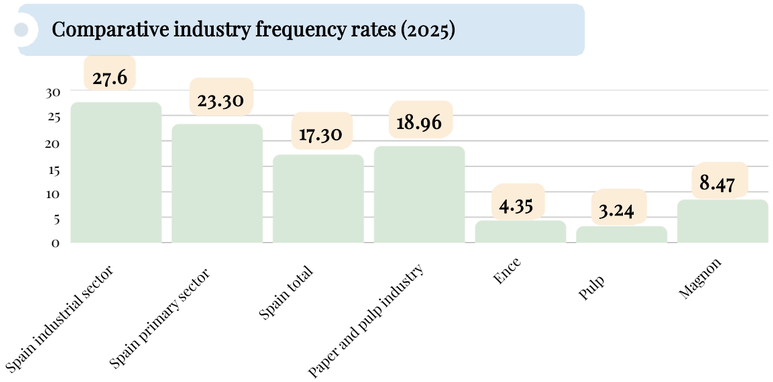
**Accident rates**

| | 2023 | 2024 | 2025 |
|---|---|---|---|
| Frequency Index (FI) | 6.40 | 4.15 | 4.35 |
| Severity Index (SI) | 0.446 | 0.192 | 0.290 |
| Hazard rate or accident rate (1) | 6.40 | 10.88 | 9.54 |

(1) Accident rate: (number of recordable occupational accidents/number of effective hours worked)*1,000,000; the number of recordable occupational accidents are those occurring at the workplace and in itinere with or without sick leave.

36. Deaths as a result of accidents at work are included (except those resulting from non-traumatic pathologies). The following are not included in the calculation of accident rates: "in itinere" accidents, or accidents resulting from non-traumatic pathologies.

In 2025, both the FI and the SI worsen compared to 2024, mainly due to the increase in the number of accidents in the energy business. Despite this, Ence's safety record is well below the benchmark accident rates in Spain. This demonstrates Ence's leadership in this area and the difficulty of maintaining such low levels.




Source: Spanish Ministry of Labour, ASPAPEL (data published in 2024).

In 2025, the pulp business recorded an accident Index (AI) almost 6 times lower than that of the pulp and paper sector. In the energy business, biomass power plants, the FI was 3 times lower than the industrial average in Spain. These low levels are due to the strong safety culture.

*Appendix III Environmental and social indicators - Accident Index* includes a breakdown of accident rates by gender, in-house staff and external staff for the main business lines.

### 3.1.8.6 WORKERS' HEALTH AND WELFARE

As well as ensuring safety in its operations, Ence also makes it a priority to protect health and promote a healthy lifestyle among its employees. In 2025, Ence continued to work on monitoring the health of its employees and promoting healthy lifestyles, with measures such as:

- **Annual medical check-ups** for its employees on a voluntary basis, compulsory for some professional profiles with greater exposure. These examinations include a comprehensive and detailed check-up that goes beyond the usual basic parameters and includes specific tests such as electrocardiogram, mammography, etc. Since November 2025, health surveillance has been outsourced.
- **Influenza vaccination campaign** in workplaces.
- The "Ence for your health" **informative bulletins**, which deal with general health issues and promote healthy habits, have also continued to be published.

Health monitoring service not only monitors health, but also draws up **plans to promote a healthy lifestyle**. They focus on promoting a balanced diet, physical activity, among others.

In addition, as part of its social benefits, Ence provides its employees with medical insurance and life and accident insurance, contributing 50% of the contribution to protect both the employee and his or her family.

Ence is responsible of preparing epidemiological studies and annual reports in the operations sites. No jobs have been identified as being at risk of occupational diseases and therefore in 2024 and 2025 **no occupational diseases have been recorded**.

### 3.1.9 EARMARKED RESOURCES

In terms of resources allocated to its in-house personnel, in 2025, Ence earmarked more than €3 million for voluntary contributions to pension plans and more than €2 million for other social expenses including, among others, voluntary contributions to life insurance, medical care, school aid and scholarships, the contribution of restaurant or canteen tickets. These amounts are reflected in note "11 Personnel" of the Consolidated Annual Accounts.

In addition to these resources, in 2025, the total investment (CapEx) related to Health and Safety has reached nearly €2.6 million.

## 3.2 Workers in the value chain (S2)

Based on the update of the double materiality analysis (*1.4.4 double materiality analysis*), Ence carried out a specific assessment to identify and evaluate the impacts, risks and opportunities related to workers forming part of the value chain. In this sense, both the workers in the value chain and Ence's in-house workers play a fundamental role in the tasks of supply, logistics and maintenance, among others, for the proper functioning of Ence's operations.

Ence's value chain is characterised by the diversity of collaborating companies with which the company works, ranging from large industrial supply companies, small and medium-sized local companies in the areas of operation and a large number of self-employed professionals in the areas of logistics or forestry work. This diversity not only enriches the work environment with a wide range of skills and perspectives, but also strengthens the company's capacity to innovate and adapt to market changes. The main types of workers in the value chain in each of Ence's businesses are described below.

The **pulp production** value chain extends from the supply of raw material to the distribution of pulp. The main groups include:

**Supply of raw materials:** To guarantee the supply of wood and biomass, Ence collaborates with:

- **Forest owners**: owners of wood production land. In these cases, Ence acquires the flight of the woodlands (standing purchases) and is responsible for harvesting and transporting the wood and/or biomass to the factory by means of harvesting companies and transporters. In many cases, especially in the northwest of the Iberian Peninsula, these are small individual landowners, families, town councils or local woodland communities with whom Ence works directly. In 2025, Ence worked with over 1,650 forest owners, around 98% of whom were smallholders.
- **Wood harvesting contracts**: these are responsible for harvesting wood in the woodlands managed by Ence (heritage woodlands or standing purchase woodlands). These are mostly small contracting companies (SMEs) with their own forestry staff (in some cases subcontracting part of their activities) and machine operators using specialised machines to cut and prepare the wood for transport. In 2025, Ence worked with over 70 wood harvesting contractors, of which more than 70% were SEMs.
- **Transporters**: these are transport companies and self-employed persons who are responsible for transporting the wood from the woodland or intermediate parks to the plants. In the vast majority of cases, this involves road transport using lorries. In some cases, these are self-employed people with only one truck or small transport companies, which operate a small number of trucks. In 2025, Ence worked with more than 190 wood transporters, over 87% of which were small transporters.

- **Wood/biomass suppliers**: they deliver wood/biomass directly to plants. They undertake the tasks of landowner relations, harvesting and transport of wood/biomass. In 2025, Ence worked with over 200 wood suppliers and more than 50 biomass suppliers, 86% and 82% of which, respectively, were small suppliers. Ence occasionally works with international suppliers who import wood from third-party countries and transport it by ship, although these are occasional contributions as more than 91% of the wood is of domestic origin.

Distribution of cellulose pulp: for the distribution of cellulose pulp from the bio-factories to the end customers, Ence collaborates with:

- **Port authorities:** Ence maintains a close relationship with port authorities for the distribution of its pulp. This collaboration is key to coordinate the efficient handling of large volumes of pulp, which is essential for Ence's logistics and distribution.

- **Port service companies**: they are responsible for the loading and unloading of vessels, as well as the temporary storage of the pulp. They have their own employees or subcontract their activities.

- **Maritime transport providers**: large companies specialised in the transport of large volumes of pulp from ports of origin to international ports of destination.

- **Transporters**: these include companies that manage land transport from Ence's production plants to the ports of origin and from the ports of destination to the final destination. These companies have their own employees or subcontract part of their activities.

In the case of the **energy business**, the main suppliers are related to the supply of biomass to the power plants and follow a similar pattern to that of wood purchases in the pulp business.

- **Agricultural landowners:** They mainly include agricultural companies and small farmers who provide with agricultural residues as a result of their activities and are key to ensure a constant supply of biomass. As with wood, direct purchases are called standing purchases, and Ence also manages the use and transport of biomass with specialised contractors. Agricultural enterprises rely on directly hired employees who in many cases are migrants with different origins and with temporary or seasonal contracts depending on agricultural needs. In 2025, Ence worked with almost 700 agricultural landowners, all of whom were smallholders.

- **Biomass utilisation contractors:** As in the case of cellulose, these are mostly small companies (SMEs) responsible for the tasks of collecting, preparing and processing the biomass to Ence's facilities. In 2025, Ence worked with 56 contractors, all of them SMEs.

- **Transporters:** They transport biomass from production areas to plants. In the vast majority of cases, road transport is involved and the means of transport used are lorries. In many cases, self-employed professionals or small transport companies load and unload the biomass and take it to Ence's facilities. In 2025, Ence worked with more than 120 biomass transporters, 97% of which were small transporters.

- **Biomass suppliers:** They are responsible for supplying biomass to electricity generation plants. These companies undertake biomass utilisation and transport. In 2025, Ence worked with almost 150 of these suppliers, 98% of which were small suppliers.

In the case of the activity of sale of **renewable thermal energy,** the biomass supply value chain is the same as described above. Ence is also responsible for the operation and maintenance of the boilers, for which it subcontracts specialised operation and maintenance companies.

In the **biomass trading** business, the main players in the value chain are related to the purchase, sale and logistics of biomass to supply different industrial and energy customers.

In the case of the generation of **bio-fertilisers and bio-methane**, Ence is also committed to a sustainable supply chain for the generation of organic bio-fertilisers from the recovery of agricultural and forestry waste, which will reduce dependence on chemical inputs and will also result in the production of bio-methane, a renewable gas that is injected into the gas grid, contributing to decarbonisation. This activity is based on a model of proximity, prioritising local suppliers, which minimises the environmental footprint and boosts socio-economic development in nearby communities. In this case, the main suppliers are related to the supply of organic raw materials for biogas production and follow a similar scheme to that of biomass, although with particularities specific to the sector. This includes smallholder farmers and local livestock farmers, as well as suppliers who provide organic waste (e.g. manure, slurry, vegetable waste, etc.) generated as a result of their activities. These materials are essential to ensure a constant supply of substrates for bio-methane production.

For its part, Ence also works with transporters who are responsible for transporting organic waste from the farms to the biogas plants. Transport is mainly by road using lorries adapted for organic materials.

In the **forest management of the equity**, this activity is a strategic source of raw material for the pulp and renewable energy business lines, providing wood and biomass from the forests managed by Ence. To carry out this management, Ence collaborates with companies specialising in forestry, forest use and transport, as well as with suppliers linked to complementary activities, such as nurseries (supply of seeds, fertilisers, etc.) and R&D entities, including universities and research centres.

In the **industry**, in addition to suppliers related to wood and biomass, Ence works with companies that supply chemicals, materials and equipment needed for pulp production and energy generation. They are usually large specialised companies, with in-house staff and industrial contractors who carry out maintenance, repairs, cleaning and safety tasks, which are especially relevant during annual technical shutdowns and in projects to expand capacity or develop new production lines, such as the manufacture of fluff pulp at the Navia bio-factory. In these projects, the company collaborates with both small local companies and large industrial groups, which sometimes subcontract part of their activities. In addition, in some facilities, operation and maintenance activities are outsourced.

Ence also maintains relations with **consultancy and engineering companies** for the design and execution of strategic projects, such as the recirculation of water in the bio-factories, the engineering of the new recycled cellulose plant in As Pontes, the production of moulded cellulose for sustainable packaging or the new business line of bio-methane plants, such as the expansion of the construction of a bio-fertiliser production plant. These collaborations range from international technologists to small local consultancies that provide support in the permitting and permitting processes.

Finally, Ence works with **corporate service providers** such as law firms, auditors and specialised consultants.

## 3.2.1 Impacts, risks and opportunities

Through the double materiality analysis described in section *1.4.4 Double materiality analysis*, a specific analysis was carried out to identify and assess the impacts, risks and opportunities related to workers in the value chain. Consultations with suppliers and other external stakeholders were also undertaken

### 3.2.1.1 IMPACTS

As explained above, a significant part of the activities carried out by workers in Ence's value chain are linked to agricultural, forestry and livestock work, largely carried out by self-employed and small businesses (SMEs), characterised by high levels of subcontracting and working conditions subject to variability due to seasonality and the hiring of immigrant workers. These tasks are also carried out in environments exposed to adverse weather conditions. In this context, there is a potential risk of negative impacts that may mainly affect the health and safety of contract workers, as well as the violation of their working conditions. The most relevant **negative impacts** include:

| Impact | Description of the impact | Prevention / mitigation measures |
|---|---|---|
| I1: Accident potential. (C / VC) | Contractors' employees may suffer accidents in the course of their employment for the company. | The safety of the employees of suppliers and contractors is a priority for Ence, which is why the company sets targets for improvement that cover both its own personnel and external workers (see section *3.1.8 Health and safety*). In this regard, Ence promotes continuous training in the companies in its value chain and provides them with innovative tools to reinforce health and safety protection. The company has developed pioneering solutions that position it as a benchmark in safety management in forestry operations. Among the main initiatives are the following:<br>◆ Measures to raise awareness and provide preventive training for contractors, through the development of video-based operating procedures and practical awareness-raising workshops aimed at chainsaw operators.<br>◆ Measures to minimise the risk of accidents during forestry operations, such as the use of distance-measuring devices, which help chainsaw operators maintain safe distances when felling trees manually.<br>◆ Development of a predictive algorithm, which integrates meteorological variables, plot characteristics and type of task, anticipating the level of risk and the probability of accident. |
| I2: Violation of working conditions. (P / VC) | Workers in the value chain may be subjected to precarious working conditions and potential violations of their labour rights. | Ence has developed preventive measures to ensure that contractors respect human and labour rights throughout the value chain and the company has due diligence mechanisms in place to detect possible breaches and terminate relationships with companies that do not meet the company's ethical standards; for more information see section *3.2.4 Human rights in the value chain*. The Code of Conduct for Third Parties, adopted in 2025, sets out the principles of conduct to be followed by suppliers incorporating, among others, respect for human rights. |

C: Current; P: Potential / OO: Own Operations; VC: Value Chain

Ence's activity also has a positive impact on the employees in the value chain, improving their working conditions:

- **Job creation:** Ence's activity significantly boosts quality employment and value creation for the communities in the areas where it operates, as the company is clearly committed to hiring local suppliers. Thus, in 2025, Ence worked with over 6,350 suppliers, around 95% of which were local. Purchases from suppliers amounted to some €971 million, with 88% of expenditure going to local suppliers. Furthermore, thanks to its forestry extension policies and the establishment of long-term relationships with suppliers and industrial partners, Ence stimulates and contributes to preventing the deindustrialisation and depopulation of the rural environment. Ence also actively contributes to the growth and development of the contractor companies with which it works, through machinery acquisition programmes and other actions that help micro agricultural and forestry companies grow, generate employment and offer better working conditions to their workers. By strengthening the industrial fabric of the regions in which it operates, Ence generates indirect and induced employment, which is key in rural Spain.

- **Training and skill set development:** Ence offers education and training programmes in its areas of influence in order to improve the skills and abilities of local communities. This provides opportunities for professional development and improved employability, with initiatives such as the forestry machinists' school.

- **Commitment to fair working conditions**: all suppliers must adhere to Ence's Code of Conduct before entering into any business relationship, ensuring that the principles of the Code of Conduct are extended to all employees, including the protection of human rights and the promotion of equality.

### 3.2.1.2 RISKS AND OPPORTUNITIES

**Risks**

Identifying and managing the risks to which Ence is exposed from its value chain in terms of the working conditions of the employees of the companies it contracts with is key to minimising potential negative impacts. The main risks identified are described below:

| Risk | Description of the risk | Prevention / mitigation measures |
|---|---|---|
| R1: Strikes in the value chain. | Strikes in the value chain can disrupt the distribution of products, affecting the production process and customer supply. | • Supplier diversification to expand the portfolio to more than one supplier or just one region.<br>• Development of contingency plans to address potential supply chain disruptions. Storage and safety stock to ensure continuity in the event of potential supply chain disruptions. |
| R2: Non-compliance with labour regulations (OHS) of suppliers. | Failure by Ence's suppliers to comply with OHS labour regulations may give rise to risks linked to the joint and several liability of Ence as the main company, as well as the potential imposition of administrative sanctions, the risk of civil liability and even criminal consequences. | • Ence actively provides health and safety information for contract workers. In addition, contractors must accredit the training and information on occupational hazards of the workers designated by the contractor for the execution of the work.<br>• The main health and safety indicators are monitored on a monthly basis, including both the company's in-house staff and those of contractors. Existence of management tools<br>• for the coordination of business activities such as dedicated software (CTAIMA), Work Permits (general and specific), Coordination Acts, Special Risk Work, Pre-task talks, etc. Monitoring tools to support “on-the-job” supervision, such as Preventive Safety Observations (PSOs).<br>• In addition, Ence has insurance coverage for these contingencies. |
| R3: Environmental or social non-compliance of suppliers. | Non-compliance with environmental and social regulations by suppliers may result in sanctions and loss of reputation for the company. | Undertaking of regular audits and assessments of suppliers to verify compliance with environmental and social regulations. |

Properly managing the potential negative impacts and risks associated with workers in the value chain is key to guaranteeing the stability and continuity of Ence's business model and the deployment of its strategy. Therefore, in the 2024-2028 Sustainability Master Plan, one of the four strategic pillars is the "Responsible Supply Chain", a pillar that aims to improve the management of the main environmental, social and governance aspects of the supply chain (for more details, see section *1.4.5 2024-2028 Sustainability Master Plan and annual objectives*).

The risk management process related to workers in the value chain is integrated into the company's global risk management process described in section *1.4.6.6 ESG risk identification, assessment and management process* and the risks stated here are included in the Risk Map.

**Opportunities**

In addition, there are opportunities related to the workers in the value chain, including the improvement of Ence's reputation driven by better human rights performance of suppliers.

### 3.2.2 Supplier dialogue process

To guarantee a transparent and efficient relationship with suppliers, Ence has various communication channels that facilitate interaction and monitoring of operations:

1. **Supplier Portal**, accessible on the **website** which allows you to consult relevant information, manage data and solve queries on transactions and contracts of industrial suppliers.
2. **ARIBA Platform**, through SAP Ariba, used for the integrated management of processes such as registration, approval, tenders, orders and invoicing, ensuring efficiency and traceability in industrial purchases.
3. **Meetings,** aimed at addressing issues of common interest and planning future collaborations.
4. **Facility visits**, which enable suppliers to learn about Ence's processes and standards.
5. **Individual interviews**, to obtain direct and personalised feedback that contributes to continuous improvement.
6. **Focus Groups,** organised to drill down on specific needs and expectations, tailoring strategies and processes more effectively.

These mechanisms strengthen a collaborative and transparent relationship, aimed at continuous improvement and joint management of potential negative impacts.
The frequency and format of interactions are defined according to the nature of the business relationship, with direct dialogue between the Ence manager and the representative of the contracted company being the norm.

### 3.2.3 Policies related to value chain workers

Ence has a Sustainability Due Diligence Policy, approved by the Board of Directors, which aims to ensure respect for human rights as recognised in international frameworks and the protection of the environment, through the implementation of due diligence processes in both its direct operations and throughout the value chain. This Policy provides for credible grievance and dialogue mechanisms, as well as remediation and redress measures for material negative impacts. This can be found in detail in section *4.6.3.1 Due diligence policy and procedure*.

On the other hand, the Code of Conduct, updated in 2025, is applicable to direct operations and suppliers. It defines the ethical basis and establishes principles and guidelines for conduct to ensure ethical and ethical behaviour.

responsible in all operations, promoting these values throughout the value chain. The Code expressly sets out a commitment to strict compliance with the Universal Declaration of Human Rights as one of the cornerstones guiding our conduct, incorporating this into our supplier recruitment and selection processes. In addition, the first specific Code of Conduct for Third Parties was approved in 2025, which establishes the ethical and compliance standards to be respected by suppliers, contractors, partners and other external collaborators of the company. This code is inspired by the UN Guiding Principles, the OECD Guidelines, the ILO Conventions, the Ten Principles of the Global Compact and international best practices in sustainability, while maintaining consistency with corporate values.

Moreover, Ence's Purchasing Policy extends its commitment to respect human rights to its supply chain. An example of this can be found in the certification process for industrial suppliers requiring a formal statement to be filled in by suppliers. In this statement, they undertake to comply with the highest ethical and behaviour standards, such as the United Nations Guiding Principles on Business and Human Rights, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the OECD Guidelines for Multinational Enterprises and the United Nations Global Compact. These statements are contractual commitments, whereby Ence ensures that its suppliers do not have a negative impact on human rights.

Finally, the Sustainability Policy sets out Ence's guidelines for improving people's well-being, ensuring the environmental sustainability of its operations, promoting the economic and social development of the communities in which it operates, and generating sustainable value. A commitment to human rights is one of the overarching principles, ensuring compliance with the main international agreements in this field.

These policies are defined to cover the main impacts, risks and opportunities related to workers in the value chain identified in section *3.2.1 Impacts, risks and opportunities*.

### 3.2.4 Human rights in the value chain

Although Ence operates mainly in markets with a low risk of human rights violations (primarily Spain and Portugal), it has mechanisms in place to ensure respect for labour rights both in its direct operations and throughout its supply chain.

In line with the Sustainability Due Diligence Policy, in 2023, Ence drew up and approved the Third-Party Due Diligence Procedure, which sets out guidelines for managing all commercial relationships, ensuring compliance with basic principles regarding human rights, the environment, ethics and compliance.

In 2025, this Procedure was updated to adapt to the digital ESG risk assessment and ethics and compliance tool. The implementation and parameterisation of this digital tool has made it possible to automate the supplier ESG assessment process by scaling up the deployment of the due diligence procedure with the analysis of 1,500 third parties. For more information on supply chain management and risk assessment, see section *4.4 Supply chain supervision*.

| Line of action | IROs | Objective | Type of objective | Business | 2025 Objective | 2025 Performance | 2028 Objective |
|---|---|---|---|---|---|---|---|
| Establish a Due Diligence process in the value chain | I1, I2, R2, R3 | Roll-out for supplier due diligence procedure | Voluntary | Ence Group | - Implementing the digital ESG risk assessment tool<br>- Assessment of >1,000 third parties | Tool implemented and 1,500 third parties assessed | >90% of turnover analysed according to the Due Diligence Procedure |

With the implementation of the Due Diligence Policy and Procedure, Ence anticipates the requirements of the Corporate Sustainability Due Diligence Directive (known as CSDDD), reinforcing its commitment to international best practices.

### 3.2.5 Channels for reporting concerns and incidents

Ence has an Integrity Line (**Integrity Line**) that enables suppliers and other interested parties to confidentially report any inappropriate conduct or violation of company policies.

The Integrity Line is the means of communication with Ence, through which employees, managers, administrators and stakeholders can confidentially transmit any information about infractions or well-founded suspicions of non-compliance with acts that contravene the Law, Ence's Code of Conduct, the Criminal Compliance Policy, the Anti-Corruption and Fraud Policy, Ence's Antitrust Compliance Programme or Ence's internal regulations and procedures. For more information, see the Integrity Line section.

In addition to the Integrity Line, Ence's dialogue mechanisms with its suppliers (see section ***3.2.2 Supplier dialogue process***) enable suppliers to express their concerns.

## 3.3 Affected communities (S3)

One of the cornerstones of Ence's sustainability strategy is to make a positive impact and contribute to the development of the communities in which it operates. It therefore prioritises the relationship with neighbouring communities on two levels: ensuring its social licence to operate through respectful behaviour and open dialogue with stakeholders, and promoting the creation of employment, local wealth and social projects that improve the quality of life. To build trusting relationships, Ence listens and responds proactively to stakeholder expectations, maintaining two-way communication channels and procedures to manage possible negative impacts.

The potentially affected communities are mainly those close to its industrial facilities, especially in peri-urban or residential areas (such as the bio-factories in Pontevedra and Navia, or the energy complex in Huelva), as well as rural communities where Ence carries out forestry activities or is supplied with raw materials. Except in Pontevedra, these tend to be small population centres, and Ence pays special attention to those who may be directly impacted by their proximity to the plants[37].

### 3.3.1 Impacts, risks and opportunities

Through the double materiality analysis described in section ***1.4.4 Double materiality analysis***, a specific analysis was carried out to identify and assess the impacts, risks and opportunities related to local communities.

#### 3.3.1.1 IMPACTS

Like any industrial activity, Ence's operations can have a negative impact on the environments in which it operates if they are not properly managed.

| Impact | Description of the impact | Prevention / mitigation measures |
|---|---|---|
| I1: Generation of noise, odours, dust and other nuisances. (C / OO, VC) | Ence's industrial activities, together with the logistics operations associated with its value chain, can generate nuisances for neighbouring communities, mainly in the form of noise, odours and increased lorry traffic. These effects, arising both from the operation of the plants and from the transport of raw materials and products, can affect the quality of life of nearby populations if not properly managed. | Ence has management plans and tools in place to minimise noise, odour and dust emissions at its plants, as well as measures to prevent nuisance from lorry traffic and the plants' impact on the landscape, which are described in greater detail in section ***3.3.5 Adoption of measures for the mitigation of negative impacts.*** |
| I2: Landscape impact. (C / OO) | The company's plants, especially those closest to population centres, can have a negative impact on the landscape and affect the perception of neighbouring communities. | |

C: Current; P: Potential / In relation to in-house staff, all impacts occur in Own Operations

In addition to the possible negative impacts, Ence's activity generates **significant positive effects** in the communities where it operates, acting as a driver of employment and local economic development. The company actively contributes to value creation, both through its direct activity and through its supply chain.

Ence also promotes the professional development of young people in the regions in which it operates, facilitating their access to the labour market through initiatives such as the Talent Programme, agreements with town councils and educational centres, and the setting up of forestry machinist schools, aimed at meeting the demand for professionals in the forestry sector. These positive impacts are explained in more detail in section ***3.3.7 Positive social footprint***.

37. The concept of indigenous peoples does not apply in Ence's forestry environment, as the company carries out its activities in Spain, where there are no indigenous peoples according to the definitions established by the UN.

### 3.3.1.2 RISKS AND OPPORTUNITIES

**Risks**

The main identified risk related to local communities is described below.

| Risk | Description of the risk | Prevention / mitigation measures |
|---|---|---|
| R1: Cancellation of new projects due to social opposition. | Growing social pressure and opposition from certain interest groups can create obstacles to the development of new projects, affecting Ence's growth plans through delays or even cancellations. This risk is mainly identified in the development of the new bio-fertiliser and bio-methane business line. | Ence applies the MISR (Minimising the Impact of Social Response) procedure, which covers everything from institutional relations with local authorities to proactive communication and dialogue with local residents and other stakeholders from the very outset. In addition, it incorporates preventive measures in plant design, such as odour studies to minimise potential negative impacts (see section *3.3.5 Adoption of measures for mitigation of negative impacts*). |

The risk management process related to local communities is integrated into the company's global risk management process described in section *1.4.6.6 ESG risk identification, assessment and management process* and the risks stated here are included in Ence's Risk Map.

**Opportunities**

Proactive management of relations with the environment not only mitigates risks, but also generates significant opportunities for Ence. Among them, the ease of incorporating local talent stands out, especially in those communities where the company promotes training and professionalisation programmes aimed at contractors. Likewise, maintaining a fluid and constructive dialogue with the ecosystem of local stakeholders favours the creation of synergies with suppliers, administrations and other entities in the environment, facilitating the development of new projects or lines of business. These partnerships can translate into logistical and operational advantages, reinforcing the company's efficiency and territorial roots.

## 3.3.2 Processes and channels for dialogue with local communities

Ence considers it essential to maintain a continuous and open dialogue with local communities to guarantee its social licence to operate, integrating their expectations and concerns into the company's strategy. To this end, it uses different processes and communication channels adapted to each stakeholder group and local context, always seeking effective and respectful interaction.

Dialogue channels are grouped into two main categories:

- **Generic channels**: They include the corporate website, social media, general emails (such as comunicacion@ence.es), media publications, participation in events and the internal information channel (https://ence.integrityline.com/).
- **Specific channels and procedures:** Targeted at specific groups, such as surveys, opinion polls, focus groups, interviews, complaint handling, supplier and customer portals, meetings, project presentations and site visits.

A prominent example is the meetings organised to present projects to local communities, such as in As Pontes or in municipalities where bio-methane plants will be developed. These mechanisms allow for the evaluation of key indicators such as the number of visits and meetings (see section *3.3.6 Objectives and metrics*).

The specific communication channels are mainly aimed at communities directly affected by Ence's activities, including municipal representatives, administrations, associations, NGOs and other groups. The company assigns specialised staff to lead the dialogue and keeps these channels open during all phases of the projects, ensuring direct and continuous communication.

In addition, Ence reinforces its commitment to transparency and dialogue by opening its doors through visits to its facilities. In 2025, more than 970 visits to the facilities were received from interest groups such as educational centres, neighbourhood associations, social entities and institutional representatives. These visits bring the company's activities closer to the public, promote knowledge of its sustainable management and strengthen trust and collaboration with the environment.
Each visit is adapted to the characteristics of the groups, promoting relationships based on closeness, active listening and the creation of shared value.

Finally, the Communication Department, together with other areas, develops communication plans tailored to each stakeholder group, including local communities.

## 3.3.3 Policies related to affected communities

The **Stakeholder Relations and Positive Social Impact Policy,** approved by the Board of Directors, defines the commitments and guidelines for interacting with stakeholders and proactively managing social contribution. It serves as a strategic framework to promote respectful, collaborative and constructive relations with all groups that influence or are affected by the company's activity.

Ence considers stakeholders to be all the people, entities and organisations that affect or are affected by its activity, structuring them into key categories for planning its corporate relations. Its operating principles are based on integrity, respect for human rights and sensitivity to local communities, fostering trust and value creation through sustainable models and responsible ESG risk management.

From the outset of each project, Ence involves stakeholders, promoting **their active participation and an open dialogue** adapted to their needs. Transparency, integration of your concerns in the materiality analysis and attention to complaints are pillars of this policy. It also promotes positive social impact initiatives to channel social and environmental actions to improve the quality of life of communities and protect the environment.

The policy also establishes monitoring procedures and assigns clear responsibilities to governance bodies and operational areas to ensure that commitments and objectives are met.

In addition, Ence's Code of Conduct also reflects its commitment to acting responsibly in the communities where it operates. It requires all administrators, directors and employees to consider the social impact of their decisions and the mechanisms for assessing and communicating it. Ence focuses its investments on respect for local communities and support for cultural and social initiatives, basing its principles on the Universal Declaration of Human Rights. In the event of any violation of these rights, Ence makes the Integrity Line available to its stakeholders, with a specific procedure for applying corrective and remedial measures (section

*3.3.4.1 Integrity Line*).


## 3.3.4 Listening processes and remediation of negative impacts

In addition to the usual dialogue channels, Ence has two specific procedures for communicating non-compliances or impacts: the Integrity Line and the community complaints management procedure.

### 3.3.4.1 Integrity Line

Ence offers all its stakeholders an integrity line, publicly accessible at https://enceintegrityline.com/ where anyone can report irregular or illegal conduct related to the company. This channel guarantees confidentiality, anonymity, protection against retaliation and respect for the rights of all parties. In 2025, no reports of human rights violations by local communities were recorded.

### 3.3.4.2 COMPLAINTS MANAGEMENT PROCEDURE

In addition, Ence has a specific mechanism for managing community complaints, which is part of the Environmental Incident Communication and Investigation Procedure. Any communication that results in an environmental impact or nuisance to a nearby community, whether from in-house staff, contractors or neighbours, is considered a complaint. All complaints are recorded and investigated following these steps:

- **Communication:** Initial registration of the complaint and implementation of immediate measures to contain the impact.
- **Investigation:** Analysis of causes, proposal of corrective and preventive measures, and follow-up of actions.
- **Response:** Communication to the persons concerned about the origin of the complaint and the actions taken.

This procedure is complemented by a Standard Operating Procedure to ensure that employees are aware of the steps to be followed. Complaint management is a priority for Ence, which sets annual targets in this area as part of the 2024-2028 Sustainability Master Plan (for more details, see section *3.3.6 Objectives and metrics*).

## 3.3.5 Adoption of measures for the mitigation of negative impacts

The main negative impacts (*3.3.1 Impacts, risks and opportunities*) that Ence's activity may generate in local communities are related to odours, noise, dust, lorry traffic and landscape effects, especially in plants located in peri-urban areas such as Pontevedra. To prevent and reduce these impacts, plans and measures have been implemented which have led to substantial improvements in indicators relating to odours, noise and dust.

With regard to the **odours** from the bio-factories, Ence implemented the Zero Odour Plan more than ten years ago, managing to reduce emissions by more than 95% since 2010. The company maintains annual targets to further reduce these emissions. In this sense, the historical record in Navia stands out, as in 2025 there were no odour minutes at all. In bio-fertiliser and bio-methane plants, industrial design minimises any source of odour through enclosed facilities, hermetic storage and systems such as bio-filters. In addition, preliminary studies are carried out to rule out locations with a risk of affecting the community. For more details on measures implemented, targets and metrics used, please refer to section *2.3 Pollution*.

With regard to the **acoustic impact,** annual noise reduction targets and plans are established, especially in plants close to residential areas such as Huelva, Navia or Pontevedra. For **lorry traffic,** Ence collaborates with logistics companies to minimise inconvenience and prioritises sites that avoid lorries passing through urban centres, maintaining accesses in good condition. For more information on the implemented measures, the objectives and the performance metrics, see section *2.3 Pollution*.

With regard to the **landscape impact** industrial projects include measures such as integrated colours and green screens. In the case of Pontevedra, landscape integration projects are carried out with significant investments. Between 2024 and 2025, the investment in landscape mitigation amounted to €130,000.

In the case of the **bio-fertilisers and bio-methane** line, the business model is based on the circular economy through the reuse of agricultural and livestock waste for the production of bio-fertilisers and bio-methane, contributing not only to decarbonisation, but also avoiding soil and aquifer pollution. In the design of new plants, as well as in the La Galera plant in operation, Ence applies strict design criteria to minimise inconvenience to the communities. For this reason, the facilities are located in areas away from urban centres, access routes are analysed to ensure that they do not generate excessive lorry traffic through urban centres, odour and noise impact studies are carried out, and advanced technologies are incorporated to eliminate odorous emissions and reduce noise. Specific measures include airtight storage of substrates, systems to reduce and neutralise odours and the provision of low-noise equipment or enclosures, reducing noise emission levels.

As a preventive measure, Ence prioritises new projects on land previously occupied by dismantled industrial facilities, favouring a just transition, the use of disused areas and the generation of local employment. An example of this is the biomass plant in Puertollano and the future recovered pulp plant in As Pontes, both of which are located in former industrial facilities.

## 3.3.6 Objectives and metrics

Ence defines lines of action and establishes objectives to prevent, mitigate, and where necessary, remedy any impacts identified that may affect local communities.

| Line of action | IROs | Objective | Type of objective | Business | 2025 Objective | 2025 Performance | 2028 Objective |
|---|---|---|---|---|---|---|---|
| Maintain social licence to operate (Odour, Noise and Dust - OND) | I1, R1 | Reduce minutes of odour (channelled + diffuse) (<60 min/year plan for 2028) | Voluntary | Cellulose (Pontevedra) | 60 min | 108 min | 60 min |
| | | | Voluntary | Pulp (Navia) | 40 min | 0 | 35 min |
| | I1, I2, R1 | Improved air quality. | Voluntary | Pulp (Pontevedra) | 42 mg/Nm3 | 33 mg/Nm3 | 40 mg/Nm3 |
| | | | Voluntary | Pulp (Navia) | 17 mg/Nm3 | 8.3 mg/Nm3 | 12 mg/Nm3 |
| | | | Voluntary | Renewable Energy | Follow-up actions Puertollano and Huelva plan | 100% implementation of planned actions | 100% implementation of planned actions |
| Reduce community complaints | I1, R1 | Reduction in the no. of complaints received | Voluntary | Pulp and Energy | 7 | 6 | 7 |

Ence sets these objectives based both on its experience in managing operations and on the feedback obtained through dialogue and complaint channels with local communities. In addition, Ence also defines objectives aimed at active collaboration with communities, which reflect its performance in its interaction with stakeholders and in key areas of positive social impact, such as the hiring of local personnel or the professionalisation of the forestry sector in Spain. The main objectives in this respect are summarised below:

| Line of action | IROs | Objective | Type of objective | Business | 2025 Objective | 2025 Performance | 2028 Objective |
|---|---|---|---|---|---|---|---|
| Foster professional development in local communities | R1 | Promote the formation of forestry machinists | Voluntary | Forestry | >30 people trained/year | 29 | - |
| | | Advising forest owners through the management improvement team | Voluntary | Forestry | >350 Consultancy services > 60% of improvements introduced | 954 Consultancy services 50.3% of improvements introduced | - |
| | | Promote the training and entering into the job market of young people from local communities (Talent Programme) | Voluntary | Group | Incorporate ≥ 4 trainees/year Launch 4 Talent programmes (Pontevedra, Navia, Magnon and corporate) | 16 new trainees<br>Launch of 4 Talent programmes | Incorporate ≥ 4 interns/year Launch 4 Talent programmes (Pontevedra, Navia, Magnon and corporate) |
| | | Encourage stakeholder visits to the facilities | Voluntary | Group | 750 visits | 972 | - |
| Stakeholder relations plan | | Organise meetings and gatherings for dialogue with stakeholders | Voluntary | Group | 50 meetings | 78 | - |

These objectives form part of the Annual Sustainability Objectives 2025, which are reviewed by the Management Committee on a monthly basis. In addition, the Sustainability Commission reviews them on a quarterly basis.

## 3.3.7 Positive social footprint

As part of its sustainability and social commitment strategy, Ence considers it essential to maintain a solid and responsible relationship with the local communities in which it operates. The company understands that its role goes beyond preserving the social licence to operate or avoiding negative impacts on its immediate environment. Its aim is to become an active agent of local development, making a tangible contribution to improving people's quality of life and the well-being of the territories where it is present.

Ence's positive social footprint is articulated through three main lines of action:

**Employment generation and value creation in local communities**

Ence's activity and its value chain represent an important driver of employment and economic development in the areas in which it operates. Through its direct and indirect contribution, the company drives the generation of wealth, promotes business dynamism and reinforces the economic sustainability of its areas of influence.

It is estimated that Ence's global activity generates more than 18,900 direct and indirect jobs, considering both the company's own employment and that generated through industrial, logistics and transport contracts, as well as in the associated forestry and agricultural sectors. This contribution is reinforced by the local hiring policy, which promotes the incorporation of local professionals and suppliers, helping to maximise the economic return in the communities. By the end of 2025, around 95% of new hires were local staff.

The company also contributes to youth employment through initiatives such as the Talent Programme, which offers scholarships to young graduates from nearby communities to facilitate their entry into the labour market and professional development. This programme provides a first experience in an industrial environment, promoting practical training and attracting talent to the sector (see section *3.1.5.3 Managing, attracting and retaining talent*).

Ence also promotes the development of the rural environment through its forestry extension policy and the establishment of long-term relationships with suppliers and industrial partners. These alliances contribute to revitalising the productive fabric, preventing deindustrialisation and halting rural depopulation by strengthening the territorial roots of their activity.

## Social plans

In addition to generating employment and wealth, Ence channels its commitment to local communities through social plans designed to maximise positive impact and create shared value. These initiatives, aligned with the Sustainability Policy and the principles of stakeholder relations, seek to respond to the social, cultural and environmental needs of each territory.

In this area, the company has collaboration agreements with the town councils of **Navia and San Juan del Puerto**, each with an annual budget of €100,000. Through these agreements, more than 60 cultural, social, sporting and environmental initiatives have been launched, benefiting over 19,100 people. Ence is also considering the possibility of supporting other social actions of special interest outside the framework of these agreements, reinforcing its commitment to the communities.

In Galicia, the company is developing the **Ence Pontevedra Social Plan,** which is part of the Environmental Pact signed with the Galician Regional Government's Department of the Environment in 2016. This plan, with a budget of €3 million per edition, is one of the main private initiatives with a social impact in the autonomous community. The fifth edition of the Social Plan was launched at the end of 2024 and has benefited 272 projects during 2025. This Plan has benefited nearly 1,700 projects over the years. In addition, in 2025, the sixth call of the Ence Pontevedra Social Plan was launched, resulting in 240 projects being awarded as beneficiaries.

The Social Plan is structured into the following areas of action: social inclusion, recovery and care of the environment, entrepreneurship and innovation, grassroots and elite sport, and education and culture. Its aim is to promote projects that foster social cohesion, economic development and environmental sustainability in Pontevedra and its surroundings. All the detailed information is available at the website www.plansocialence.es

In parallel, Ence encourages the active participation of its workforce in corporate volunteering projects, aimed at social inclusion and environmental protection. Of particular note was the collaboration with the Adecco Foundation and Avadi Down Huelva, which made it possible to carry out activities aimed at promoting the inclusion in the workplace of people with different abilities and to raise awareness of sustainability and care for the environment. In addition, the company promotes solidarity campaigns in its centres, such as the collection of gifts during the Christmas period for local children, encouraging participation and social awareness among employees.


## Professionalising the sector

One of the fundamental pillars of Ence's social contribution is the professionalisation of the sectors linked to its value chain, especially forestry. The company promotes various training and support initiatives that strengthen technical training and employability in rural areas.

Within this framework, Ence offers a free technical advice service to forest owners, with the aim of promoting sustainable woodland management, improving productivity and strengthening resilience in the face of climate change. Through this programme, which has already provided more than 2,000 consultancies in Galicia, Asturias and Cantabria, the company offers landowners its expertise in forestry, soil analysis and plantation planning.

In addition, the company offers a comprehensive 360º service for forest owners, which includes the supply of quality plants, accompaniment in cultivation, purchase of timber, processing of permits and complete forest management, also incorporating advice on other ecosystem services, such as the capture of $CO_2$ from forests.

In order to alleviate the shortage of skilled labour in the forestry sector, Ence develops training courses for forestry machinists, aimed at improving the safety and professionalism of operations. In 2025, 29 machinists were trained. In addition, in 2025, the company was visited by the European Forest and Environmental Capability Council, which was interested in learning first-hand about this pioneering training model and its contribution to improving safety in forestry operations.

Ence also supports the growth and professionalisation of the companies in its supply chain through initiatives aimed at improving their efficiency, competitiveness and stability. These include the financing of equipment, the availability of replacement machinery and specialised technical advice, consolidating long-term relationships and strengthening the sustainability of the productive fabric linked to the company.

## 3.4 Customers (S4)

Ence's business model is primarily based on business-to-business (B2B) activities, focusing on commercial relationships with companies that transform its products into finished goods. Pulp is an intermediate product sold to paper companies, the electricity generated is traded on the wholesale market, the renewable thermal energy is supplied to industries, and the bio-methane is injected into the gas grid. The only case in which Ence makes its products available to private customers is the sale of plants in its nurseries, which represents a non-significant fraction of the company's turnover, and these are not general consumers, but forest owners who use the plants for their plantations.

Therefore, Ence's products are not intended for end consumers, but for companies, and consumer-related aspects are not considered material for the company. However, "added value for customers" is relevant as a material entity-specific matter ("entity-specific") (see section ***1.4.4.2 Results***), which encompasses the relationship with industrial customers and the development of differentiated products. Given that the information required by ESRS S4 for "consumers and end users" is, to a certain extent, applicable to the "customers" stakeholder group and the specific material aspect mentioned, Ence incorporates the main guidelines, using the ESRS S4 framework as its reporting structure to provide information relating to customers in this report.

### Description of customer groups

Ence's business model, based on the circular economy and the use of natural and renewable resources, offers its customers products with marked sustainability attributes. Moreover, in a highly competitive and commoditised pulp market, Ence's ability to meet customer expectations and offer innovative solutions is crucial to its long-term growth and profitability.

The main types of Ence customers are described below:

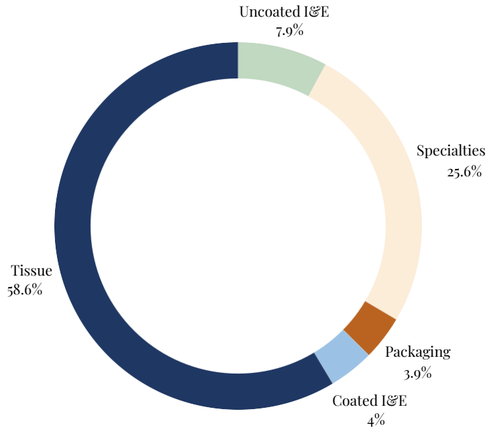
### Pulp customers

Main group by turnover. These are companies that buy pulp for the production of tissue paper, printing and writing paper, packaging, and specialities such as decoration, filters, food contact paper or other specialities. In many cases, these products replace non-renewable materials such as plastics.

In 2025, most of Ence's turnover in the pulp business was focused in the tissue paper segment. After that, the most representative categories are specialities, printing and writing (I&E) and packaging.

Regarding the future production plant for bleached pulp from recovered paper to be located in the municipality of As Pontes, the business will be aimed at a customer profile similar to the current one for conventional pulp, mainly in the tissue paper segment. The as customers of future facilities for the production of sustainable packaging from pulp will be companies in the food and retail industries.

**Pulp: % of turnover by segment 2025**




In 2025, Ence's total sales of pulp products amounted to 967 KtAD. The main destination markets for this production are in Europe, with Germany, Poland and Spain being the geographical areas where the bulk of the turnover is concentrated. For further details on the geographical distribution of revenue, see section "9.2 Geographical distribution of revenue" of the Consolidated Financial Accounts.

### Biomass customers (trading):

The customers in this line of business are mainly companies that buy biomass from Ence to use it in their processes as a greenhouse gas-neutral fuel. Ence's main customers in this line of business belong to the agri-food, food and beverage and wood industries, among others, and include both large companies and SMEs.

### Renewable thermal energy customers (heating)

This line of business is aimed at companies seeking to decarbonise their industrial processes, which are difficult to electrify, by replacing boilers powered by fossil fuels such as natural gas with renewable fuels like biomass. Ence has a contract in operation with a leading company in the food industry since 2023. It also has three other projects under construction and has been awarded an operation and maintenance contract in 2025 for a plant that has already been built. Ence's main customers in this line of business are companies in the food and beverage industry.

### Improved plant customers (nurseries)

Within forestry activity, Ence has nurseries that are mainly earmarked for the production and genetic improvement of eucalyptus plants. These plants are not only used in the heritage woodlands managed by Ence, but they are also sold to third parties. The customers of nurseries are forest owners who benefit from improved plants in terms of productivity, resilience to environmental stress caused by climate change and resistance to pests and diseases.

### Carbon credit customers

In its heritage woodlands, Ence carries out forest sink projects that absorb $CO_2$ from the atmosphere and which can be registered in various voluntary offset credit trading schemes, such as the Spanish Climate Change Office register. Ence trades the credits generated by these projects and its main customers are companies that adopt climate neutrality commitments and need to offset any emissions that they have been unable to reduce. Ence's main customers in this line of business are large listed companies from various industries with advanced climate policies.

## 3.4.1 Impacts, risks and opportunities

Through the update of the double materiality analysis described in section *1.4.4 Double Materiality Analysis*, a specific analysis was carried out to identify and assess the impacts, risks and opportunities related to Customers. Consultations with customers were also carried out.

### 3.4.1.1 IMPACTS

Ence strives for excellence in the quality of its products and seeks to establish trusting, long-term relationships with its customers. However, if not managed properly, **negative consequences** may arise during the course of business dealings that affect customers, primarily in relation to the processing of data and confidential or sensitive information

| Impact | Description of the impact | Prevention / mitigation measures |
|---|---|---|
| I1: Loss of confidential or sensitive customer data. (P / OO). | Potential impact on customers through potential loss or publication of confidential information. | To mitigate this impact, Ence has a Privacy Policy, also applicable to customers, which regulates the use and protection of any data handled by the company. In addition, the Code of Conduct also establishes the principles of confidentiality and the processing of confidential and strictly confidential documents by setting out the rules for archiving, reproduction, distribution and destruction of confidential and strictly confidential information and documentation. Based on these standards, Ence implements systems and procedures to prevent the loss or improper disclosure of its customers' confidential data, including cybersecurity mechanisms to prevent the loss of data due to cyber-attacks (for more information, see section *4.7 Cybersecurity*). |

C: Current; P: Potential / In relation to in-house staff, all impacts occur in Own Operations

The use of Ence's products also has **positive impacts** for its customers (beyond the technical and economic advantages offered by the company's products). These positive impacts namely include improved customer reputation through the use of products with enhanced sustainability features, such as Ence Advanced products; or through the application of decarbonised technologies, such as heating (renewable thermal energy) and trading customers using biomass instead of fossil fuels or the use of emission offset allowances.
To monitor the impact of Ence's activities on its customers, Ence has processes and channels for dialogue, listening and remediation that enable it to obtain information on how its activities and end products affect customers. For more detail see sections *3.4.3 Processes and channels for dialogue with customers* and *3.4.4 Listening processes and remediation of negative impacts*.

### 3.4.1.2 RISKS AND OPPORTUNITIES

**Risks**

| Risk | Description of the risk | Prevention / mitigation measures |
|---|---|---|
| R1: Loss of customers due to non-compliance with sustainability clauses. | In a market where sustainability is becoming a key factor, a lack of robust ESG positioning may put Ence at a disadvantage compared to competitors which are better positioned in this area. | To strengthen Ence's sustainability positioning, Ence has a Sustainability Master Plan that includes the company's strategic sustainability priorities and objectives, managed by specialist staff both at corporate level and within the various business units. This structure facilitates the implementation of sustainable initiatives and compliance with sustainability standards. Ence was also awarded an "Excellent" rating by the *ce* rating agency for ESG this year. In 2025, Ence also joined the Sedex platform, a global platform to promote responsible practices in the supply chain. The Sedex SAQ (social and ethical) and ESQA (environmental) questionnaires enable sustainability performance to be assessed. Ence obtained an "Advanced" rating in both questionnaires, reflecting a high level of compliance and commitment to international ESG standards. |

The risk management process related to customers is integrated into the company's global risk management process described in section *1.4.6.6 ESG risk identification, assessment and management process* and the risks stated here are included in Ence's Risk Map.

**Opportunities**

Ence's portfolio of special products represents a competitive advantage and an opportunity to generate added value thanks to its higher margins. The products of the **Ence Advanced** line stand out, with a strategy aimed at *"decommoditising"* and designing tailor-made solutions together with customers, prioritising sustainability to help them reduce their environmental footprint. Among the most relevant products are Naturcell and Naturcell Zero (certified carbon neutral), as well as Powercell and Closecell. In addition, the Navia bio-factory has started pulp fluff production for absorbent hygiene products, replacing imports and improving margins compared to standard pulp. For more information on how Ence has integrated these opportunities into its strategy, see section *1.3.1 Strategic Framework - Pulp Business*.

## 3.4.2 Customer-related policies

The Code of Conduct (website), approved by the Board of Directors, requires acting with integrity, seeking the highest quality and excellence in service, and maintaining business relationships based on trust and mutual respect. It also states that information and advice to clients must be truthful, complete and timely, and extends respect for human rights to all business relationships. Respect for human rights and strict compliance with the Universal Declaration of Human Rights is one of the ethical pillars of the Code of Conduct, and these principles apply to all commercial relations, including Ence's customers. The Code of Conduct for third parties, approved by the Board of Directors in 2025, includes human rights commitments to be fulfilled by business partners, including customers.

In addition, Ence's Integrated Management System ensures alignment with the **Management Policy** (website) approved by the Board of Directors and compliance with international standards ISO 14001 for environmental management; ISO 45001 for occupational health and safety management; ISO 50001 for energy management; ISO 22000 for food safety; and ISO 9001 for quality management. In addition, both the pulp and biomass energy businesses are Zero Waste certified, and Navia and Pontevedra are certified under the Zero Waste certification.

EMAS scheme. These systems, certified annually, guarantee excellence in processes and products, focusing on customer satisfaction and continuous improvement. Ence is thus committed to complying with the applicable requirements and regulations, strengthening the trust and loyalty of its customers.

MORE INFORMATION

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## 3.4.3 Processes and channels for dialogue with customers

Ence seeks long-term relationships of trust with its customers, based on collaboration and quality of service. To this end, it maintains a proactive and continuous dialogue to understand their expectations and needs, using a variety of communication channels, especially in the pulp area:

- **Reciprocal visits:** Ence teams regularly visit their customers' facilities to learn about their processes and experiences, and in turn, invite customers to their production centres and nurseries to demonstrate the production cycle and innovations.
- **Opinion questionnaires:** Ence launches opinion questionnaires for its customers to find out their perception of the most relevant aspects of their commercial relations, such as delivery time, product quality, certificates and documentation, sales department service and technical service. In 2025, the data for 2024 were analysed, with an average score of 4.3, which is the highest in the last thirteen years. The aspects most valued by the customers include the level of service of the sales team, the ease of contacting the right person and the responsiveness of the team. In the latest questionnaire, the ratings in the section on Deliveries continue to improve, and Food Safety is included as an improvement. On the other hand, the best rated section continues to be Sales.

In all business areas, Ence's commercial and technical team is responsible for establishing and maintaining channels of communication and dialogue to ensure smooth relations and respond promptly to customer requests for information.

## 3.4.4 Listening processes and remediation of negative impacts

In addition to the channels for dialogue described above, Ence has specific mechanisms for customers to register potential negative impacts, breaches of the code of conduct or any other incident, such as the Integrity Line and specific procedures in the lines of business, as in the case of the Registration and Monitoring System for Pulp-related Claims and Complaints.

### 3.4.4.1 Integrity Line

Ence has an Integrity Line through which all stakeholders, including customers, can report irregular or unlawful conduct in the course of the company's activities that is contrary to its Code of Conduct, its corporate policies and standards or the legal framework in force. In this regard, all stakeholders have the **Internal Information System Policy** (available on the website) at their disposal, approved by the Management Committee, which establishes the channel's operating mechanism and Ence's principles of conduct in this area.

In 2025, no customer communications have been received through the integrity line. For more information on the line and the procedure for managing and responding to communications, as well as the monitoring and reporting mechanisms and how Ence ensures that stakeholders are aware of the line, see section *Integrity Line*.

### 3.4.4.2 REGISTRATION AND MONITORING SYSTEMS FOR CLAIMS AND COMPLAINTS

In addition to the Integrity Line, Ence has a Registration and Monitoring System for all claims and complaints from customers in the **pulp business** to make sure that all necessary measures are put in place to resolve any claim or complaint in a timely manner, thus ensuring customer satisfaction and maintenance of a trusting relationship with the company.

The Registration and Monitoring System serves as a basis for managing and responding to these situations and is regulated by the *Internal Customer Non-conformities Procedure for Quality.* In this system, in addition to formal claims, complaints and any comments related to possible customer dissatisfaction with the service or product supplied are also recorded. To differentiate between them, in cases where the incident affects compliance with guarantees or other aspects such as incidents caused by the product or service, additional costs, returns, etc., it is treated as a claim, while in other cases it is considered a complaint or comment.

Through this system, a total of 14 complaints and 20 claims were registered in 2025 on a total of more than 8,000 pulp sales transactions.

In order to manage and resolve the incidents received, Ence draws up a follow-up report known as the 8D Report. This report provides a detailed description of the problem, details the immediate containment actions implemented, performs a root cause analysis and defines corrective and preventive actions to avoid recurrence of the problem. In addition, the report includes a list of the verification actions that Ence carries out to ensure that corrective and preventive actions have been effectively implemented.

In the case of **biomass customers** (trading), for each customer, Ence's CRM (Customer Relationship Management) creates and updates a record of its business activity with them, including dialogue actions with them, such as the record of visits and meetings. The Biomass Business Management Procedure also sets out the actions to be taken in the event of customer claims which are related, for example, to the quality of the material supplied. As regards **renewable thermal energy customers** (heating), Ence has in-house staff at the customer's facilities who are directly responsible to them for any possible incidents.

In the case of **nursery customers** (forest owners), Ence provides them with various channels of contact with the company. In addition, Ence offers owners a Free 360º advisory service, in which the company's technical experts give them information on how to prepare the land beforehand, how to plant and how to carry out subsequent maintenance work. They are also offered advice on the type of species and variety that best adapts to the characteristics of their woodland, as well as the best time to plant in order to obtain maximum profitability, and on the possible pests and diseases that could affect their plantation and how to combat them. Ence also offers them a study of the economic profitability that they will obtain from the sale of their wood, depending on the species, logging and the seasonal quality of the land, as well as legal advice on permits, distances to be respected in plantations, etc. In 2025, nearly
1,000 consultations were carried out, bringing the total to over 2,000 since the launch of this initiative.

## 3.4.5 Adoption of measures and earmarked resources

As mentioned in the section on Impacts, Risks and Opportunities, Ence has taken measures to reduce and mitigate risks and negative impacts and maximise opportunities in relation to the creation of value for its customers. The main actions and resources aimed at meeting the objectives set out in section ***3.4.6 Objectives and metrics*** on the pulp business are stated below:

- To enhance all ***Ence Advanced*** special products in 2025, Ence has carried out a project based on the improvement of current special products, the development of new products and applications and the reinforcement of customer approvals.

- Meanwhile, to promote fluff, an absorbent hygiene product, Ence has invested nearly €7 million in 2025, or €14.5 million if leasing is also taken into account. The equipment will be ready to replace up to 125,000 tonnes of standard pulp with this higher-margin product, progressively from 2025, when pilot production trials for fluff have already begun.

## 3.4.6 Objectives and metrics

| IROs | Objective | Type of objective | Business | 2025 Objective | 2025 Performance | 2026 Objective | 2028 Objective |
|---|---|---|---|---|---|---|---|
| O1 – increase in sales revenue of specialities with added value by Ence Advanced | Increasing penetration in the market of specialities | Voluntary | Pulp | 12 additional approvals | +18 Additional approvals | 12 Additional approvals | Reach 160 product approvals |
| | Increase sales of special products and fluff | Voluntary | Pulp | Increased sales of specialities | Increase to the level set for 2025 | Increase sales of special products | >50% of revenue from sales of special products and fluff |
| | Achieve fluff sustainability certifications | Voluntary | Pulp | Achieve 7 certifications | 3 | - | - |

These objectives form part of the Annual Sustainability Objectives 2025, which are reviewed by the Management Committee on a monthly basis and are reported to the Board of Directors. In addition, the Sustainability Commission reviews the objectives on a quarterly basis.

The objectives relating to advice for forest owners are described in section ***3.3.6 Objectives and metrics*** on local community development.

As regards the negative impact identified in relation to the potential loss of confidential data and risks related to reputational damage due to insufficient positioning on sustainability issues or due to supply disruptions or quality issues, Ence, as part of its continuous improvement, incorporates these aspects into its daily management. Although no specific objectives are set for each of these risks, Ence manages them proactively and continuously through the mitigation measures described in sections ***3.4.1.1 Impacts*** and ***3.4.1.2 Risks y opportunities***.

# 04 | GOVERNANCE



# 04

# GOVERNANCE

## 4.1 Good Corporate Governance (G1)

Ence's Board of Directors is committed to articulating a comprehensive, transparent and effective corporate governance system that allows the company's governance bodies to be structured in such a way as to protect the interests of shareholders and other stakeholders and to generate long-term value.

### 4.1.1 Main lines of action in the area of good governance

In accordance with this commitment to good governance, Ence's Board of Directors has maintained its focus in 2025 on the following four lines of action:

**1. Maintaining an effective and up-to-date internal body of regulations**

In 2025, the Ence Board of Directors approved the Antitrust Policy, the Criminal and Anti-Bribery Compliance Management System Manual and the Code of Conduct for third parties. The update of the Company's Code of Conduct was also approved.

The approved or amended policies have been made available to shareholders and other stakeholders on the website.

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**2. Ensuring that the composition of the governance bodies is adapted to the company's needs**

| | Business | | | | Corporate areas | | | | Other | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Pulp / Forestry | Agri-cultural | Rene-wable Energies | Industrial | Senior Mana-gement | Accoun-ting / Finance / Risks | Legal / Corporate Governance / Compliance | Digiti-sation / IT | Sustain-ability / Environ-ment | Human Capital / Talent Manage-ment / Remune-ration | Inter-national expe-rience | Experience on the boards of listed companies and investor relations |
| Ignacio de Colmenares | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Maria Paz Robina | | | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | ✓ | |
| Javier Arregui | ✓ | ✓ | | | ✓ | | | | | | | ✓ |
| Óscar Arregui | ✓ | ✓ | ✓ | | | | | | | | | |
| Ángel Agudo Valenciano | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| José Ignacio Comenge | ✓ | ✓ | | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Gorka Arregui | | | | ✓ | ✓ | ✓ | ✓ | | | | | ✓ |
| Carmen Aquerreta | | | | ✓ | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | ✓ |
| Rosa Maria Garcia | | | ✓ | | | ✓ | ✓ | | ✓ | | ✓ | ✓ |
| Irene Hernández | | | | ✓ | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ |
| Maria Samoilova | | | | ✓ | ✓ | ✓ | | | ✓ | | ✓ | |
| José Guillermo Zubía Guinea | | | | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | | |
| Fernando Abril-Martorell | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

According to Ence's competency matrix, the company's Board of Directors covers, as a whole, the specialised skills and knowledge necessary for the proper development of the strategic objectives, including skills in the company's core businesses, as well as in other necessary areas such as sustainability, industry, legal, finance, risk management and talent management.

Board members' skills are kept up to date with the help of the **knowledge update programme** made available to them by Ence. In this respect, Ence has a Welcome Programme to introduce new directors joining the company to the internal regulations and general rules of operation of the governing bodies and the securities markets. In addition, Ence holds training sessions for board members every year. In the 2025 financial year, Board members have received in-person training focusing on subjects such as geopolitics, the macroeconomic environment and health and safety.

### 3. Having diverse governance bodies in place

The above measures to identify and update the skills of directors contribute to fostering the presence of diverse profiles in terms of knowledge and experience on Board of Directors, and therefore to the enrichment and breadth of deliberations and the certainty of decisions.

Likewise, the Board of Directors ensures that the selection procedures for its members favour diversity, that they facilitate the selection of female directors in a number that enables a balanced presence of women and men. The presence of women on Ence's Board of Directors has remained at 38.5% in 2025, with all committees, except the executive committee, chaired by independent female directors.

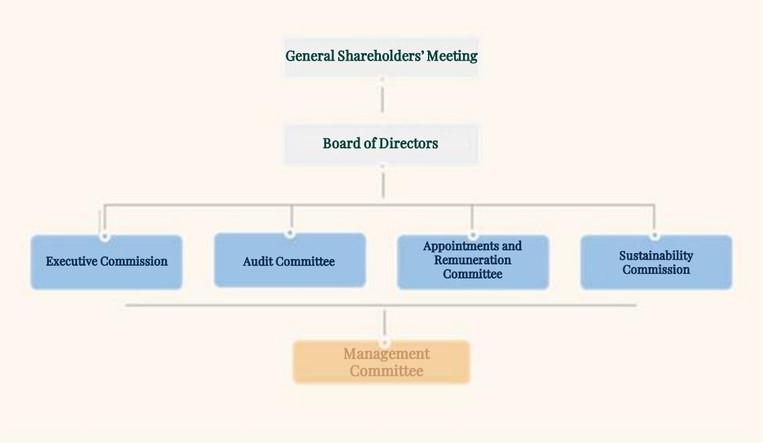
The company remains focused on meeting the diversity objective set out in its Policy for the Selection of Directors and Diversity in the Composition of the Board of Directors, to the extent that the filling of vacancies on the Board makes it possible to move in this direction, as well as the implementation of measures to encourage the company to have a considerable number of female senior managers, all in accordance with the recommendations for good corporate governance of listed companies and the amendment of Article 529 bis of the Capital Companies Act, implemented by Law 2/2024 of 1 August, which will be applicable to Ence as of 30 June 2027.

Ence has also remained a member of the **Ibex Gender Equality** published by BME in 2025. This index is designed to represent listed securities that comply with the presence of women of between 25% and 75% on the Board of Directors, and of between 15% and 85% in Senior Management. This recognises the efforts Ence has been making over the last few years to promote equality.

### 4. Have governing bodies focused on managing ESG aspects

Ence's Board of Directors maintains a proactive approach to integrating environmental, social and governance issues into its strategy, with a clear commitment to the creation of sustainable and shared value with stakeholders. The **Sustainability Commission** is made up of members with expertise in matters related to sustainability and during the financial year, it has dealt with a wide range of issues in depth, including the review of the Annual Sustainability Report for the 2025 financial year, the quarterly monitoring of sustainability objectives with the main focus on areas of health and safety, the analysis of the sustainability information included in the quarterly financial information, the regular update of regulatory developments, the review of the verifier's recommendations, the review of the results of the sustainable forest management audits (FSC® and PEFC), the monitoring of the company's social actions and sponsorships, the update of the double materiality analysis and the identification and review of the risks derived from climate change and ESG risks.

## 4.1.2 Composition and functioning of the governing bodies




**Process for delegating authority:**

The Board of Directors has delegated the powers that are not legally or statutorily non-delegable to the Managing Director and the Executive Commission. The Company also has a structure of managers and employees empowered to implement its strategy and basic management guidelines, whose powers are granted under two operating principles: (i) the principle of association, which governs the exercise of dispositive or organizational nature faculties; and (ii) the principle of solidarity, which governs the exercise of faculties of mere representation before Public Administrations.

The Board of Directors or the Managing Director grants the general and special powers of attorney that may be required, in accordance with the Company's Internal Powers of Attorney Regulations, to carry out certain economic or management actions, subject to the limits and conditions established in said powers of attorney.


### General Shareholders' Meeting

The General Shareholders' Meeting represents all Ence shareholders and has the powers provided for by law, the Articles of Association and the Regulations of the General Shareholders' Meeting (more information available on the website). All of Ence shareholders whose shares are registered under their names, in the corresponding accounting records, five days before the date of the General Shareholders' Meeting, have the right to attend and vote at meetings.

The Ordinary General Shareholders' Meeting was held on 03 April 2025, with the following resolutions:

- Approval of the annual accounts and of the directors' report of the company and of its consolidated group.
- The approval of the consolidated non-financial information statement (2024 Sustainability Report).
- Approval of the proposal for the allocation of the result of the financial year.
- Approval of The Board of Directors Management.
- Re-election and appointment of the following members to the Board of Directors:
  - Re-election of Mr Ángel Agudo Valenciano, as Proprietary Director.
  - Re-election of Mr Fernando Abril-Martorell Hernández as another External Director
  - Re-election of Mr José Guillermo Zubía Guinea as another External Director.
  - Re-election of Ms Irene Hernández Álvarez as an Independent Director.
  - Re-election of Ms Carmen Aquerreta Ferraz as Independent Director.
  - Appointment of Ms Maria Samoilova as Independent Director.

- Re-election of the auditors of the Company and its consolidated group.
- Appointment of an Independent Verifier of the non-financial information of the Company and its consolidated group.
- Delegation of powers to interpret, supplement, rectify, execute and formalise the agreements.
- Advisory vote on the annual report on remuneration for directors for 2024.

The average percentage of votes in favour of the agreements was 97.75%. The Meeting was held in person at the Rafael de Pino Auditorium in Madrid, allowing and enabling the necessary means for the remote attendance of shareholders and the casting of electronic votes. In addition, the **Electronic Shareholders' Forum** was set up on the corporate website, which can be accessed, in accordance with the applicable regulations, by both the shareholders and the voluntary associations constituted and registered in the special register which was set up for this purpose at the National Securities Market Commission.

## Board of Directors

***Functions***

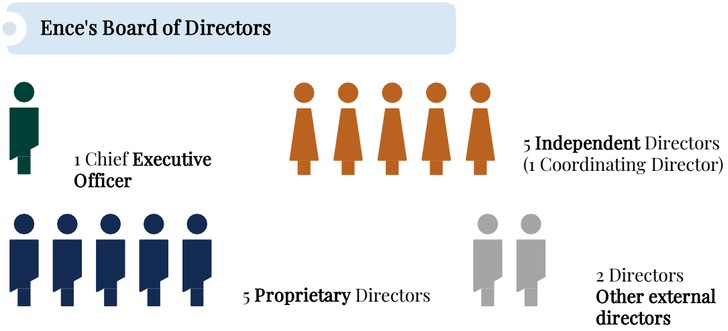
The Board of Directors is the supervisory, management and control body of the Company, with the functions attributed to it by the Law and the Articles of Association, among others:

- Deliberating and approving the Company and Group strategic plan, including the definition and, in that case, the review of its mission and values, as well as the economic, social, and environmental objectives in the short, mid and long-term.
- The approval of sustainability policy, the risk control and management policy and the dividend policy.
- Establishing the corporate governance policy of the Company and the Group.
- The approval of the Crime Prevention and Detection Model.
- The approval and publication of financial and sustainability reporting.

***Composition:***

The Board of Directors has an efficient and diverse composition:

- 38.5% of directors are independent
- One of the independent directors is the coordinating director
- 38.5% of Board members are women
- The average age of the directors is 58.3 years
- The average length of service on the Board is 7 years.




## The Independent Coordinating Director

In accordance with Recommendation 34 of the Unified Code of Good Governance, at Ence, the functions attributed to the Independent Coordinating Director extend to aspects additional to those that legally correspond to him.

It is the Coordinating Director's responsibility: a) to chair the Board of Directors in case of Chairperson and Vice-Chairperson absence; b) to request the Chairperson to convene the Board of Directors and to participate, together with him, in the planning of the annual meeting schedule; c) to voice the proposals and opinions of the non-executive directors; d) to maintain contact with investors and shareholders in order to ascertain their views for the purpose of forming an opinion on their concerns, in particular, in relation to the corporate governance of the Company; and e) to direct the periodic evaluation of the Chairperson and to lead and organize, where appropriate, the Chairperson's succession plan.

Main issues addressed in 2025

- Preparation of the individual and consolidated annual accounts and management report of the Ence Group for the 2024 financial year, and approval of the necessary reports to be made available to the Ordinary General Meeting.

- Call to the General Shareholders' Meeting and formulation of the proposed resolutions to be submitted to it. Approval of the procedure and provision of the means for holding the General Shareholders' Meeting.
- Preparation of the Annual Non-financial Information Statement (Annual Sustainability Report).
- Approval of quarterly financial reports and half-yearly financial statements.
- Review, reporting and, where appropriate, approval of corporate transactions.
- Monitoring of strategic issues and potential business opportunities.
- Strategic reflection and conclusions.
- Approval of the 2025 budget.
- Setting the objectives and metrics of the ILP Cycle II (2023-2027), and updating its beneficiaries.
- Approval of the Antitrust Policy. Approval of the Criminal Compliance and Anti-Bribery Management System Manual.
- Approval of the Code of Conduct for third parties.
- Update the Code of Conduct.
- Update of the Global Risk Map.
- Approval of the renewal of an Ence Sustainable Promissory Note Programme in MARF.
- Review of the organisation and talents of the Management Committee. Review of succession or contingency plans.
- Analysis of the markets in which the company operates and preparation of the necessary forecasts.
- Regular information from the company's top executives on the evolution of the businesses for which they are responsible.

### Selection and assessment

The selection of candidates which will join Ence's Board of Directors follows the procedure and principles established in the Policy for the Selection of Directors and Diversity in the Composition of the Board, approved by the Board, which is available on the website.

Directors shall hold office for a maximum period of three years and may be re-elected once or several times for periods of the same duration. The assessment of the Board follows the mechanism set out in Article 19a of the Board of Directors' Regulations. The results of the annual self-assessment lead to an action plan for the following year.

### Remuneration

The Board of Directors is responsible for determining each director's remuneration, with previous report from the Appointments and Remuneration Commission, within the framework of the **Directors' Remuneration Policy** approved by the General Meeting. A detailed breakdown of all the remuneration items received by the Directors during the financial year is included in the Annual Report on Directors' Remuneration also available on Ence's **website**.

### Committees

The following table contains the most relevant information on the composition of the four committees of Ence's Board of Directors. The powers of each of the committees are detailed in articles 14 to 17 bis of the Regulations of the Board of Directors. Details of these functions can also be found in the Annual Corporate Governance Report 2025, available on Ence's website.

| Council | Legal category Council | Age: | Executive Commis-sion | Audit Committee | Appointments and Remuneration Committee | Sustainability Commission |
|---|---|---|---|---|---|---|
| Mr. Ignacio de Colmenares | Chief Executive Officer | 64 | C | | | |
| Ms Irene Hernández | Independent Coordinating Director | 60 | M | M | M | |
| Mr Javier Arregui | Proprietary Director | 55 | M | | M | |
| D. Óscar Arregui | Proprietary Director | 52 | | M | | M |
| José Ignacio Comenge | Proprietary Director | 74 | M | | | |
| Mr Gorka Arregui | Proprietary Director | 50 | M | | | |
| Angel Agudo | Proprietary Director | 52 | | | | M |
| Ms Maria Samoilova | Independent Director | 41 | M | | | |
| Ms Rosa Maria Garcia | Independent Director | 51 | | M | M | C |
| Ms Carmen Aquerreta | Independent Director | 57 | | C | | M |
| Ms Maria Paz Robina | Independent Director | 61 | | | C | M |
| Mr. Fernando Abril-Martorell | Other External Director | 63 | M | | M | |
| Mr. José Guillermo Zubía | Other External Director | 79 | M | M | | |

M: member; C: chairperson

| Council | | Executive Commission | Audit Committee | Appointments and Remuneration Committee | Sustainability Commission |
|---|---|---|---|---|---|
| Average age | 58.4 | - | - | - | - |
| % of women | 38.50% | 14.30% | 60.00% | 60.00% | 60.00% |
| % of independent ones | 38.50% | 14.30% | 60.00% | 60.00% | 60.00% |
| Independent Chairperson | - | - | ✔ | ✔ | ✔ |
| 2025 Meetings | 11 | 7 | 7 | 6 | 5 |
| % attendance* | 97.90% | 97.96% | 94.29% | 93.33% | 88.00% |

* The breakdown of individualised assistance is included in the IAGC paragraph C.1.25

The main points addressed by the Committees during the 2025 financial year are described in the operating reports drawn up by each of them, which were approved by the Board of Directors.

**Senior Management**

Senior Management comprises the Management Committee, the Internal Audit Directorate and the Ethics and Compliance Department. The Management Committee is composed of the Managing Director, the General Managers of the business areas and the General Managers of the cross-cutting corporate areas, it is responsible for the day-to-day management of the company and jointly makes the main economic, social and environmental decisions which, where appropriate, may be submitted to the Board of Directors within its sphere of competence. The Members of the Management Committee report to the Chairperson and Managing Director and participate in the meetings of the Committees and of the Board of Directors to report on matters within their competence, upon invitation by the respective Chairpersons of these bodies.

| Management Committee | Name | Position |
|---|---|---|
| ✔ | Ignacio de Colmenares Brunet | Managing Director |
| ✔ | Jordi Aguiló Jubierre | Managing Director of Cellulose |
| ✔ | Isabel Vallejo de la Fuente | Managing Director of Human Resources |
| ✔ | Alfredo Avello de la Peña | General Manager of Finance and Corporate Development |
| ✔ | Reyes Cerezo Rodríguez-Sedano | General Secretary and Managing Director of Sustainability and Regulation |
| ✔ | Modesto Saiz Suarez | Sales, Marketing and Logistics Director of Celulosa |
| ✔ | Fernando González-Palacios Carbajo | Director of Planning and Management Control |
| ✔ | Guillermo Negro Maguregui | Managing Director of Magnon Green Energy |
| | Ángel J. Mosquera López-Leyton | Internal Auditing Director |
| | Carla Morenés Basabe | Ethics and Compliance Director |

## 4.2 Ethics and compliance

### 4.2.1 Governance bodies as regards business conduct

Ence is firmly committed to ethics, integrity and transparency at all levels of the organisation, from the Board of Directors to the management teams.

Governance and key roles:

- The **Board of Directors** is the highest body responsible for the approval and supervision of the Crime Prevention Model, promoting "zero tolerance" for unlawful acts.
- The **Audit Committee** oversees the operation of the Crime Prevention Model and ensures compliance with regulations.
- The **Management Committee** is responsible for implementing established policies and procedures, acting with integrity and supporting teams in fulfilling their duties..
- The **Ethics and Compliance Department,** an autonomous area reporting periodically to the Audit Committee, supervises, monitors and reviews the Crime Prevention Model.
- The **Internal Audit Directorate** assesses internal control systems and risks, reporting to the Commission.

In addition, the Ence Board of Directors recognises the strategic relevance of regulatory compliance, incorporating this competence into its knowledge matrix, which includes an understanding of the ethical principles of business conduct (see competence matrix at *4.1.1 Main lines of action in the area of good governance*).

## 4.2.2 Impacts, risks and opportunities

Section *1.4.4 Double materiality analysis* describes the process of identifying and assessing the material impacts, risks and opportunities for the Ence Group in terms of business conduct.

### 4.2.2.1 IMPACTS

| Impact | Description of the impact | Prevention and/or mitigation measures |
|---|---|---|
| **I1: Insufficient whistleblower protection. (P / OW, VC)** | The absence of mechanisms to protect whistleblowers against retaliation for reporting malpractice would give rise to a loss of trust on the part of whistleblowers, and therefore, a weakness in the system for detecting conduct contrary to internal regulations or to the law. | Ence has an ***Integrity Line*** through which the confidentiality and anonymity of whistleblowers is guaranteed, and the absence of retaliation is ensured for anyone who reports breaches or malpractice. In addition, the company has a Policy and Procedure (**website**) for the Internal Information System (**website**) to ensure the correct use and knowledge of this line. Furthermore, training sessions on ethics and compliance are held on a regular basis, highlighting the importance of transparency and the reporting of malpractice. |
| **I2: Corruption and malpractice. (P / OO)** | A lack of robust culture of ethics among employees could result in inappropriate conduct or practices, with consequences for Ence's public image, and where appropriate, possible sanctions for the company. | Ence reinforces its culture of ethics and good governance through policies and procedures such as the **Code of Conduct, the Third Party Code of Conduct, the Criminal Compliance Policy, the Anti-Corruption and Anti-Fraud Policy and the Antitrust Compliance Programme**. To assess risks in the value chain, the company applies due diligence processes to suppliers and partners using digital tools to identify and mitigate risks of corruption, malpractice and other non-compliance. |

C: Current; P: Potential / OO: Own Operations; VC: Value Chain

Responsible business conduct not only prevents negative impacts, but also generates **relevant positive impacts** for Ence and its environment:

- **Extension of sustainability and business conduct criteria to the supply chain:** Ence extends its good practices of sustainability and good business conduct to its supply chain, strengthening its position as a benchmark.
- **Internal awareness of sustainability, ethics and compliance:** Internal training and awareness-raising actions in sustainability, ethics and compliance reinforce Ence's commitment, promoting a corporate culture aligned with the company's strategic objectives and encouraging responsible practices at all levels of the Group.
- **Improving the social licence to operate and sector positioning**: the application of compliance control and supply chain monitoring systems helps to build trust among communities and stakeholders, thereby strengthening the social licence to operate and sectoral standing.

### 4.2.2.2 RISKS AND OPPORTUNITIES

*Risks*

The identified risks concerning business conduct pose potential threats that may have a negative effect on the company's operations, reputation and regulatory compliance.

| Risk | Description of the risk | Mitigation measures |
|---|---|---|
| **R1: Cases of corruption or bribery.** | A lack of effective controls or a sound culture of ethics could result in sanctions for the company. | Ence minimises corruption and bribery risks through the application and updating of conduct policies (Code of Conduct, Criminal Compliance Policy and Anti-Corruption Policy), continuous training in ethics and compliance, and internal audits. The use of digital tools strengthens supply chain management. In 2025, this system was consolidated with external audits by AENOR, which confirmed the effectiveness of the model and made it possible to obtain **ISO 37001** (anti-bribery management) international certification and to revalidate **UNE 19601:2017** (criminal compliance). In addition, a **Criminal and Anti-Bribery Compliance Management System Manual** aligned with international best practices was developed. |
| **R2: Non-compliance with whistleblower protection regulations.** | The absence of appropriate mechanisms to protect whistleblowers against malpractice could result in sanctions for the company and loss of trust among employees and stakeholders. | The ***Integrity Line*** which is governed by the Policy and Procedure (**website**) of the Internal Information System (**website**), guarantees the confidentiality and anonymity of whistleblowers, and the absence of retaliation is ensured for anyone who reports breaches or malpractice. The Procedure has been updated in 2025, incorporating as fundamental principles the timely, independent, complete and confidential analysis of all communications or enquiries received, within a reasonable timeframe. |

*Opportunities*

- **Improved environmental and social performance**: Employee awareness and training in sustainability, ethics and compliance practices boost environmental and social performance, leading to greater acceptance and contributing to maintaining the social licence to operate.

- **Enhanced reputation and access to new customers**: reinforcing the Ence's image through responsible and sustainable practices helps to attract new customers and build relationships with strategic stakeholders.

- **Reduced exposure to regulatory changes**: proactive and early adoption of regulations and standards concerning sustainability and business ethics reduces vulnerability to regulatory changes, ensuring compliance and minimising associated risks.

## Cross-cutting mitigation measures

In addition to the mitigation measures described above, Ence has cross-functional tools in place that reinforce its culture of ethics and compliance and help to prevent risks in this area, such as the Crime Prevention Model, the Criminal Risk Map and the Criminal Compliance and Anti-Bribery Management System.

### Crime Prevention Model

This model establishes the parameters of conduct, and mechanisms that make it possible to detect, prevent, and where appropriate, mitigate potential risks associated with the commission of crimes. Its main performances include:

- Regular identification and assessment of potential criminal risks through an updated matrix. Two new risks (public health offence and misleading advertising arising from the start-up of the moulded fibre business) and 86 new controls were added in 2025.

- Ongoing monitoring and improvement of the model, supported by risk management tools and controls.

- Establishment and maintenance of the Integrity Line, a key tool for reporting conduct or events that potentially constitute a crime or breaches of Ence's Code of Conduct.

The criminal risk management process is ongoing and includes periodic verification of the model and its updating when relevant offences are detected, organisational, structural or legislative changes occur.

In 2025, **criminal risk prevention and compliance mechanisms have been strengthened**. In the annual review of risks and controls, the Ethics and Compliance Department analysed the evidence presented by those responsible for **more than 390 internal controls** across the organisation, verifying their proper implementation.
**Specific risk analyses** were also carried out for new activities and businesses (biomethane and moulded fibre).

### Criminal risk map

In order to ensure effective supervision and control over all the Group's activities, Ence has a criminal risk map that identifies those areas in which criminal actions could lead to criminal liability for the company. This map is drawn up in accordance with a methodology approved by the Board of Directors, which includes both an assessment of the risks of incurring the offences referred to in article 31 bis of the Criminal Code and a review of the controls in place to prevent or mitigate such risks. The map is updated periodically to incorporate legal modifications, new activities or lines of business. In order to optimise the management of risks and their associated controls, the Ethics and Compliance Department has implemented the tool GlobalSuite, which enables integrated, traceable and efficient management of the Criminal Risk Map.

### Criminal compliance and anti-bribery management system

In 2025, Ence submitted its compliance system to internal and external audits, obtaining highly satisfactory results. The Internal Audit Department carried out a specific audit of the Criminal Compliance Management System, while AENOR carried out an external audit of the Anti-Bribery and Criminal Compliance Management System. Prior to the anti-bribery certification, an external consultant audited the management system without detecting any non-conformities.

As a result of this work, Ence successfully passed the certification audit **ISO 37001** in June 2025 (anti-bribery management system), obtaining this international certification. At the same time, **the UNE 19601:2017 certification** for the criminal compliance management system was renewed. Ence thus stands out among the companies in its industry for having **double certification** in compliance (anti-bribery and criminal), which reinforces the confidence of its stakeholders by demonstrating that it has robust and verified anti-corruption controls in place.

### Third-party monitoring

In the area of third-party monitoring and the value chain, Ence reinforced due diligence in 2025: 1,285 companies were registered in the third-party risk assessment tool, of which **34% presented a high level of risk** mainly associated with the country in which they operate or their industry.

## 4.2.3 Business conduct policies and procedures

Ence's commitment to ongoing improvement in regulatory compliance is reflected in new policies and the review of key internal standards in 2025. The Board of Directors approved a new **Competition Policy**, establishing clear principles to prevent anti-competitive behaviour, as well as a new Criminal and Anti-Bribery Compliance Management System Manual, aligned with international best practices in the field. In addition, the Board of Directors also approved the update of the **Ence Code of Conduct** and the new **Third Party Code of Conduct**.

### 4.2.3.1 BUSINESS CONDUCT POLICIES

Ence has a set of policies that establish and regulate the company's principles of business conduct, ethics and compliance. All of these enable the prevention, and where appropriate, mitigation of potential risks and related negative impacts. The Code of Conduct is the document that establishes Ence's general principles and commitments. However, in addition to this Code, which acts as a general framework, Ence has developed specific policies for aspects such as the fight against corruption and fraud, criminal compliance and the prevention of bribery. The main internal rules in this area are described below:

#### Code of Conduct

In 2025, the **company's Code of Conduct** was comprehensively revised and updated. This project has aimed to adapt the Code to the new ethical and regulatory challenges of today's business environment, incorporating emerging best practices in areas such as digitalisation, artificial intelligence, climate change, cybersecurity, diversity and inclusion, among others. The update seeks to explicitly reinforce Ence's commitment to integrity and ensure that the Code faithfully reflects the values and principles that guide the actions of all the company's employees and collaborators.

The Code of Conduct sets out the Group's ethical pillars and establishes the principles of conduct that guide Ence's administrators and professionals in the performance of their activities and people representing Ence. It also reinforces the company's commitment to ethical behaviour and integrity.

The Code of Conduct is binding on all administrators, professionals and third parties acting on behalf of the company or falling within its scope of application. It also establishes the duty to report any known or suspected non-compliance through the Integrity Line. This Code is available to all the company's stakeholders on the group's corporate website.

All Ence professionals must adhere to the Code of Conduct upon joining the company. In addition, all new recruits are required to undergo training in the Code of Conduct.

The Audit Committee of Ence's Board of Directors is the body in charge of monitoring and controlling the implementation of the Code of Conduct, as well as its correct dissemination and compliance.

#### Ence Third-Party Code

In 2025, Ence's Board of Directors approved the first Code of Conduct for third parties. This Code applies to all counterparts that have commercial relationships with Ence, whether suppliers of goods and services, including contractors, subcontractors, consultants, etc., or other commercial partners. It aims to promote responsible conduct in the supply chain, generating long-term value for both Ence and its stakeholders. To this end, it sets out the principles and minimum requirements to guarantee an ethical, responsible and sustainable supply chain, aligned with corporate values and international best practices. It is inspired by the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Conventions, the Ten Principles of the UN Global Compact, as well as international best practices in sustainability. This Code is available on the website.

#### Fighting Against Corruption and Fraud Policy

As part of its commitment to a zero-tolerance approach to corruption, Ence has adopted an Anti-Corruption and Anti-Fraud Policy, which has been approved by Ence's Board of Directors and is available to all the company's stakeholders on the corporate website. This Policy demonstrates the commitment to conducting business with integrity, avoiding all forms of corruption and complying with applicable anti-corruption and fraud prevention regulations.

This Policy is binding on all of Ence's administrators, professionals and subsidiaries or investee companies, as well as third parties acting on behalf of the company or falling within its scope of application.

#### Criminal and Anti-bribery Compliance Policy

Ence's Criminal Compliance and Anti-Bribery Policy is aligned with international standards and best practices in the field of compliance; it sets out the general principles governing the company's actions in the prevention of crime to ensure diligent professional conduct, and condemns any form of unlawful behaviour, whilst seeking to prevent, detect and mitigate all types of misconduct.

This Policy is binding on all administrators and employees of the Ence Group, as well as on third parties acting in Ence's name (employees of subcontractor companies, agents and intermediaries, etc.), and for all those under Ence's control.

The Policy has been approved by the Board of Directors and is available on the company's intranet and website.

#### Internal Information System Policy

The Internal Reporting System Policy, approved by the Board of Directors and available on the website, establishes the general principles governing the operation of the internal communication channel, as well as guarantees of whistleblower protection. In it, Ence is firmly committed to adopting all necessary measures to prevent any type of retaliation against those persons who, acting in good faith, report irregular or unlawful conduct contrary to the Code of Conduct or the legal framework applicable to the Group's activities.

This policy applies to all companies within the Ence group, to all its professionals and to third parties that have dealings with the Group. Within this framework, Ence asks all its professionals to make an annual declaration of compliance with the Code of Conduct, the Anti-Corruption and Anti-Fraud Policy, the Antitrust Programme and the Declaration of Conflict of Interest.

The Code of Conduct, the Criminal and Anti-Bribery Compliance Policy and the Fighting Against Corruption and Fraud Policy require explicit and mandatory acceptance by all Ence professionals.

The company also requires all its suppliers to adhere to the third-party Code of Conduct, the Anti-Corruption and Anti-Fraud Policy and the Criminal and Anti-Bribery Compliance Policy before entering into a business relationship with Ence.

### Integrity Line

Ence has an ***Integrity y Line*** through which both its in-house staff (employees, general managers, administrators, etc.) and workers in the value chain and other stakeholders can confidentially report any misconduct, breach or well-founded suspicion of non-compliance that contravenes current legislation, the Ence Code of Conduct, the Criminal Compliance Policy, the Fighting Against Corruption and Fraud Policy, the Antitrust Compliance Programme or the company's internal regulations and procedures.

All this information is set out in the aforementioned Internal Information System Policy, which also establishes the rights of informants and the principles of action, among which Ence guarantees an environment of transparency and integrity, ensuring the confidentiality and, when requested, the anonymity of the informant. Investigations are conducted in an objective and diligent manner, respecting the rights of all parties involved, such as honour, presumption of innocence and data protection. Technical and organisational measures are taken to preserve identity and retaliation or threats against whistleblowers are expressly prohibited.

The Director of Ethics and Compliance manages the Integrity Line independently and reports quarterly to the Audit Committee on the communications received, the results of the investigations carried out and the measures adopted in each case, ensuring the effectiveness of the system.

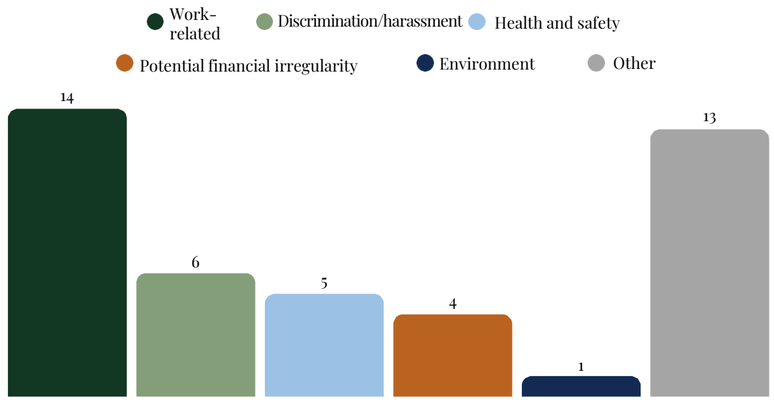
The access routes to the Integrity Line are:

Through the website:
https://enceintegrityline.com/

Postal mail
Ence Energía y Celulosa.
Att. Responsable del Sistema Interno de Información (Internal Information System Officer). C/Estébanez Calderón 3-5, 28020 Madrid

Through the QR code

**Communications received through the Integrity Line**




The use of the Integrity Line **has grown significantly in 2025**. Forty-three communications were recorded in 2025, compared to 31 in 2024 and 22 in 2023. This represents an increase of **39% regarding 2024**. This sustained increase indicates **increased confidence and awareness of the channel** by employees and other whistleblowers for reporting, aligned with the outreach initiatives undertaken by the Ethics and Compliance Directorate.

Of the 43 reports received via the internal reporting channel, Ence has carried out the appropriate investigations, in accordance with the procedure, and implemented the corresponding actions in accordance with the internal regulations in force. Specifically, 14 communications were related to labour issues, 6 to discrimination/harassment, 5 to health and safety, 4 to potential financial irregularities, 1 to environmental issues and the remaining 13 to other matters. In this regard, no complaints of corruption or human rights violations have been received.

Of the total number of communications, 35 have been closed following the relevant investigation (81%) and 8 (19%) are still open. The Web Application is the channel most used by informants, in 80% of the cases, indicating a preference for digital media due to ease of use, good accessibility and successful dissemination within the company.

Nearly three quarters of the communications were resolved within **15 days** from receipt. 10% required more than one month of investigation before being closed (more complex cases). This performance in response times is positive: **100% of communications were handled within the defined procedural deadlines**, demonstrating the channel's commitment to speed and effectiveness.

**The channel is open to both employees and outsiders,** but in 2025 the vast majority of **communications came from in-house staff.** Specifically, 39 of the 43 communications were made by professionals from within the organisation, while 4 came from external sources.

In 2025, there was a clear prevalence of **internal instruction** of the communications received in the Internal Channel, **36 of the 43 cases** were investigated and handled **internally** (84%). Only 7 communications (≈16%) required the appointment of an independent external trainer, usually to ensure objectivity in sensitive situations or potential conflicts of interest. As a result of the 2025 investigations, the following were implemented **2 disciplinary measures** (a sanction of dismissal and a reprimand) for the most serious cases with conclusive findings. The remaining communications prompted corrective measures and operational improvements (e.g. **reinforcement of procedures, trainings, reminders of policies**) in response to the issues raised.

To make the Line known, the Ethics and Compliance Department has launched various initiatives such as the "Coffee and Compliance" meetings held at the facilities, which aim to reinforce Ence's culture of integrity and where the Integrity Line is made known, as well as internal communications through various means (intranet, e-mail, specific Teams channel, physical signs at Ence's premises, etc.).

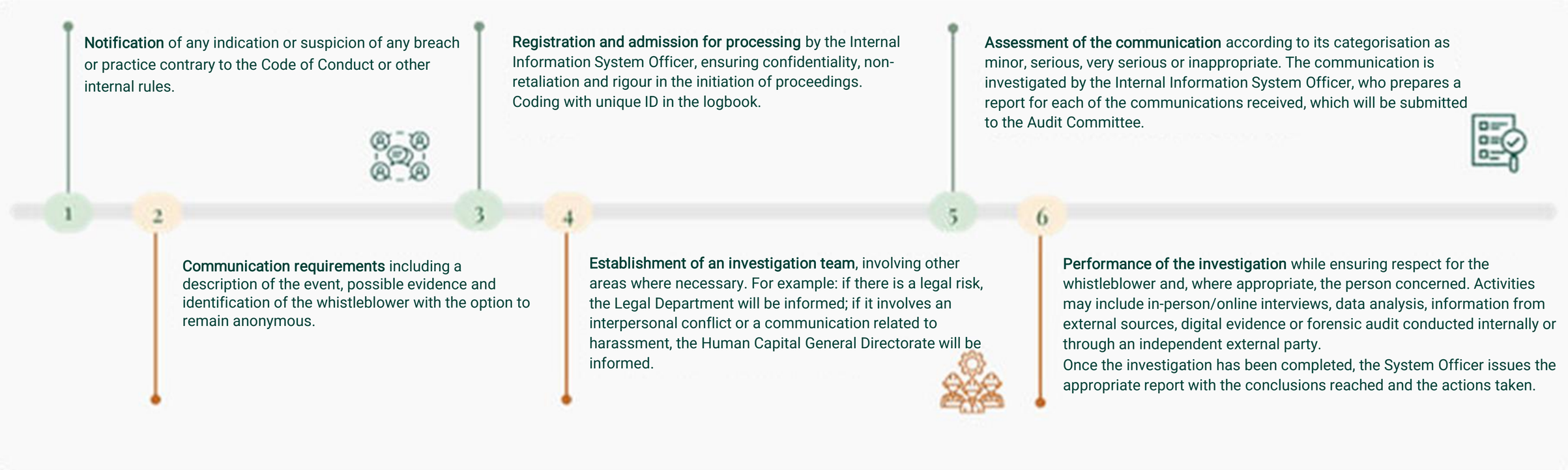
### Integrity Line procedure

Furthermore, this Procedure was updated in 2025; among its core principles is the commitment to ensure, for all communications or enquiries received, a timely, independent, complete and confidential analysis within a reasonable period of time, which shall not exceed three months from the acknowledgement of receipt of the complaint.

Once the communication has been received, an acknowledgement of receipt is sent and it is coded with a unique identifier. Depending on the content of the communication, the internal information system officer will assess the need for involvement of other areas and conduct an investigation of the communication. Once the investigation has been completed, the system officer will issue the appropriate report with the conclusions reached, as well as any actions taken, and notify the whistleblower of the aforementioned.

The management of the Integrity Line is governed by a procedure (website) that sets out the rights and obligations of the whistleblower and the person concerned. These include: the right to confidentiality, non-retaliation and the presumption of innocence; the possibility to choose the means of communication; the duty to act in good faith; and the guarantee of timely analysis of all communications. It also ensures the processing of the disciplinary, sanctioning or judicial processes necessary to proportionally reproach conduct contrary to the regulations.

**Integrity Line procedure**




### 4.2.3.2 BUSINESS CONDUCT PROCEDURES

In addition to the Policies and standards described above, Ence has the following **internal procedures:**

**Corporate Procedure for the prevention and management of conflicts of interest**

The purpose of this procedure is to establish the principles of action for preventing or, as the case may be, dealing with conflicts of interest that any professional may have in the performance of his or her duties.

This procedure is designed to detect any situations in which personal, family, professional or financial interests interfere, or may interfere, with an individual's value judgement in the performance of their duties to the organisation for which they work or provide services.

**Procedure for donations, collaboration agreements and sponsorships**

The Procedure was updated in 2025 to regulate the application, selection, approval and registration process so as to ensure compliance with the Group's ethical principles. The beneficiaries must be suitable for establishing relationships with Ence, and the activities subject to the donation or sponsorship must be compatible with the Group's activities and values, in compliance with the applicable legislation and the company's internal regulations. The Ethics and Compliance Department has been included in the Sponsorship Committee for the assessment and acceptance of sponsorships. This procedure is binding on the whole Ence Group, as well as on third parties acting on its behalf.

**Corporate procedure for giving and receiving gifts and hospitality in the public and private sector**

Ence maintains a policy of transparency in its relationships with the public and private sectors. For this reason, an update of the corporate gift procedure has been approved in 2025. The purpose of this procedure is to establish clear principles of conduct for Ence professionals in all matters related to the giving and receiving of gifts and hospitality resulting from their interaction with customers and suppliers in the public and private sectors, in order to ensure compliance with the Code of Conduct, the Anti-Corruption Policy and other internal regulations. In this update, the gift registry has been strengthened and a threshold amount for accepting gifts from third parties has been set.

**Criminal Compliance and Anti-Bribery Management System Manual.**

In 2025, a new Compliance Management Manual has been approved in line with international best practices.

**Other procedures**

The Ethics and Compliance Department is also responsible for participating in the updating of procedures and internal regulations of the operational areas. This year, with the support of the Ethics and Compliance Department, we have updated the **procedure for In-Person and Online Meetings with External Parties,** reinforcing information security and regulatory compliance in these meetings (including guidelines on data protection and the use of digital tools).

## 4.3 Prevention of corruption and bribery

The prevention of corruption and bribery in Ence is articulated through the internal policies set out in section ***4.2.3 Business conduct policies and procedures***. The **Fighting Against Corruption and Fraud Policy** establishes zero tolerance against any form of corruption and the company's commitment to conduct business with integrity. For its part, the **Criminal and Anti-Bribery Compliance Policy** sets out the principles of conduct for crime prevention and the development of diligent professional conduct.

The Ethics and Compliance Department, in conjunction with the Internal Audit Department, regularly monitors the operation and effectiveness of the internal procedures and controls put in place to prevent, detect and mitigate the risks identified in the risk analysis. This work is complemented by the **Crime Prevention Model** which identifies the risks in each area and establishes internal controls on corruption and bribery.

In accordance with the provisions of the Integrity Line Procedure, in cases where reports received may have criminal implications, the Head of the Internal Reporting System shall issue a proposed resolution, which shall be approved by the Audit Committee and the Board of Directors. In addition, where required by law, information shall be forwarded to the Public Prosecutor's Office. In all cases, the policies and procedures in place ensure independence between those responsible for conducting the investigation and the parties involved.

During the 2025 reporting period, there have been no confirmed cases of corruption or bribery and there have been no convictions or fines related to the violation of anti-corruption or anti-bribery laws.

### 4.3.1 Prevention of money laundering

Although Ence does not consider money laundering to be a priority risk, as its business model is based on direct relations with industrial customers, this aspect is included in the internal audit plans.

Apart from specific audits and the review of the Internal Control over Financial Reporting System (ICFR), Ence carries out extra internal controls to prevent money laundering, such as the analysis and blocking of pulp sales transactions if customers based in sanctioned states or tax havens are detected.

### 4.3.2 Training, communication and other actions to reinforce a culture of ethics and compliance

Ence has a training and communication programme managed by the Ethics and Compliance Department. Its aim is to reinforce the culture of ethics and integrity. Staff receive regular updates on compliance regulations via the intranet, emails, a monthly *newsletter*, and in-person and online meetings.

A new project has been launched in 2025, the creation of the figure of "**Compliance Ambassadors**" in the operational centres as local integrity references: they promote the ethical culture *on site,* disseminating the Code of Conduct and internal regulations among their colleagues, supporting the early detection of risks of non-compliance in day-to-day operations and acting as a two-way communication channel, transferring doubts or ethical concerns from the workforce to the Ethics and Compliance team.

**Training**

The ethics and compliance training programme is mandatory for all employees and includes a course on the Code of Conduct, the Criminal and Anti-Bribery Compliance Policy, the Fighting Against Corruption and Fraud Policy and the Integrity Line.

All employees must undergo training on these policies when joining the company. In addition, the Ethics and Compliance Department holds training sessions throughout the year. In the area of training for the Board of Directors and its Committees, Ence has made the AUNA online platform available to its Directors, facilitating access to courses on ethics and compliance, including the new Code of Conduct, prevention of corruption and other related matters.

In 2025, training activities on ethics and compliance have been carried out, in which 1,176 people have participated, representing **more than 90% of the workforce at year-end**. The objective established in the Sustainability Master Plan was to reach more than 90% of employees during the 2024-2028 period. The main topics covered in these training sessions have been the Code of Conduct, the Criminal Compliance Policy and the Fighting Against Corruption and Fraud Policy, the Corporate Policy on the Internal Information System, the Integrity Line Procedure and the Harassment Protocol. Ence has also made available to all its employees a course on the competition defence programme, a course on environmental crimes and criminal liability, a course for those responsible for controls of the Crime Prevention Model and a course on the fight against corruption developed by the UN via the corporate intranet. The content included training on business ethics and criminal regulatory compliance, the integrity line and the performance of case studies.

As regards staff categories especially exposed to criminal risks, i.e. Ence Group directors, **100% of them** are trained in anti-corruption and bribery. Some of these training activities have included anti-corruption and bribery, resolution of interpersonal conflicts and prevention of harassment.

### Communication

Ence also undertakes communication and ethics and compliance awareness actions for its employees through channels such as the intranet, the AUNA platform, the MiEnce application and other corporate channels.

In 2025, more than 50 internal communications were published on different compliance matters, including reminders on the use of the Integrity Line, updates on procedures and policies and the relevance of their knowledge and application on a daily basis, infographics on key aspects of new procedures, such as the Procedure for Offering and Receiving Gifts and the Procedure for Conflicts of Interest, and leaflets that were handed out at informal talks held with Ence professionals at industrial facilities.

Another of our communication initiatives involves the monthly publication of an ethics and compliance *newsletter* that is e-mailed to all Ence Group employees and is issued on paper at plants and bio-factories in order to facilitate its distribution to those who do not work with e-mail on a daily basis. On a monthly basis, some compliance communications published on the intranet are also included in the publication Green People. This is also sent to all employees by email and printed out so that it is physically available on site. To provide all employees with easier and more organised access to the wide range of documentation and information relating to ethics and compliance, there is also an Ethics and Compliance section on the corporate intranet, as well as a tag on *Teams* for all ethics and compliance publications.

Communication with suppliers has also been strengthened by sending out the new Third Party Code of Conduct.

### Other initiatives

### Compliance surveys

Another indicator of transversal commitment is the **Annual Ethics and Compliance Survey 2025**, launched to collect the perception of employees from all areas and levels on the corporate ethical culture. With the participation of **280 people** from the organisation, the results show a high degree of awareness and commitment:

- 97% of respondents are aware of the Code of Conduct, policies and
- Ence's compliance procedure.
- 90% consider regulatory and ethical compliance to be a priority for Ence.

  The average rating of the ethical example of superiors is 4.4 out of 5, reflecting confidence in ethical leadership.
- 89% say that internal rules are respected in their work environment, an improvement of 2 points compared to 2024.
- Almost 50% of employees perceive a positive change in Ence's ethical culture over the last year.

As for the Integrity Line, 95% of the staff are aware of its existence and 91% know how to use it correctly.

Trust in the Channel has increased by 7 percentage points compared to the 2024 survey, reaching 77% of employees who rely on the Channel for reporting irregularities.

This increase suggests that whistleblower protection measures, dissemination of the Line's policy and training actions have been effective.

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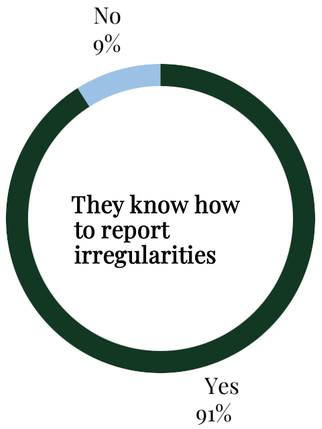
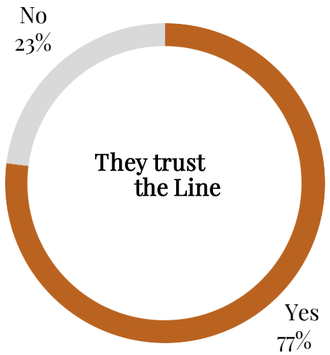
In addition, the training and communication initiatives deployed (courses, newsletters, coffees, etc.) have **received an average score of 4.1 out of 5** by employees, with special emphasis on the "compliance cafés" for their friendly format, the new compliance ambassadors project, as well as the clarity of communication and the accessible presence of the compliance team.

**Knowledge and trust of the Integrity Line**

### Coffee and Compliance

At the start of 2024, the Ethics and Compliance Department began a new awareness-raising project dubbed "Coffee and Compliance" to reinforce Ence's culture of integrity. This initiative has been carried out in all offices, plants and bio-factories throughout the year and consists of holding sessions with small groups in order to bring the ethics and compliance functions closer to all areas, allowing the different projects to be explained and settle any doubts that the professionals who participate in the talks may have. At the end of the meeting, participants are invited to complete a satisfaction survey. A total of 307 people have been trained through this initiative and 100% of participants recommend it to other colleagues.

In 2025, improvements have been implemented with the presentation of case studies, projection of information on screens, delivery of leaflets and infographics, as well as quizzes quiz interactive *quiz* to increase participation.

Actions such as "Coffee with Compliance", with case studies and specific meetings with business areas, have strengthened the link between compliance and the different operational areas, helping to build trust and internalise the compliance culture.

Participants highlight the initiative as innovative, approachable and useful, especially for its informal and participatory format. There was a high level of satisfaction and a good reception of the session, with several participants asking for regular repeat sessions, reminders and updates, and stressing the importance of attendance to reinforce the ethical culture. They point out that it creates a more open and trusting environment.

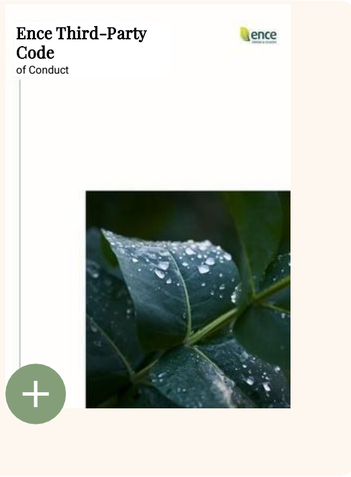

## 4.4 Supply chain monitoring

Ence promotes integrity not only in its operations, but also throughout its value chain. It therefore applies ethical principles and establishes policies, approval processes and evaluation systems for suppliers in order to reduce the risk of conduct contrary to its internal regulations.

### 4.4.1 Responsible supply chain policies

#### Ence Third-Party Code

In 2025, the Board of Directors approved the new Code of Conduct for third parties, available to all stakeholders on the website. This Code applies to all business partners, including suppliers, contractors, subcontractors, consultants and other business partners who must formally accept the commitments contained in this Code. It aims to promote responsible conduct in the supply chain, generating long-term value for both Ence and its stakeholders.



The commitments set out in the Code of Conduct for third parties include:

- **Legal and regulatory compliance:** Suppliers must comply with the applicable laws in the locations where they operate, including labour, tax, environmental, competition, health and safety, and data protection regulations. In addition, they must have internal controls and training to ensure compliance.
- **Respect for human rights and fair working conditions:** Suppliers must respect internationally recognised human rights, such as the ILO conventions. Child labour, forced or involuntary labour, human trafficking and any form of harassment or discrimination are strictly prohibited. Freedom of association, collective bargaining and safe, healthy and decent working conditions must be guaranteed, with salaries and working hours in accordance with current legislation.
- **Business ethics and anti-corruption:** Suppliers must act with integrity, honesty and transparency, complying with applicable regulations (such as *FCPA o UK Bribery Act*). Any form of corruption, bribery, extortion or fraudulent practices is prohibited. They should avoid conflicts of interest and declare any relationships that affect commercial objectivity. Anti-corruption policies and training are required.
- **Protection of the Environment:** Ence's suppliers must operate in an environmentally responsible manner, minimising their impact, managing waste, reducing emissions and optimising the use of energy and resources. They are expected to have environmental management systems in place and to promote sustainability in their supply chain.
- **Diversity, inclusion and non-discrimination:** Ence suppliers must promote an inclusive, diverse working environment free of discrimination for reasons of gender, race, religion, sexual orientation, disability, age or any other personal status.
- **Privacy and protection of data:** Ence's suppliers must protect confidential information and personal data in accordance with applicable regulations, including the GDPR, and establish protocols for notifying incidents or security breaches within reasonable timeframes.
- **Due diligence and traceability:** Ence suppliers must implement due diligence processes to identify, prevent and mitigate risks in the areas of human rights, the environment, ethics and legal compliance in both their operations and supply chain. They must also ensure the traceability of materials and services, particularly those classified as high-risk under the relevant regulations (for example, the EUDR).
- **Reporting mechanisms and informant protection:** Ence suppliers must offer secure and confidential channels for employees and third parties to report irregularities or breaches of the Code, guaranteeing protection against retaliation for good faith reports.

It is inspired by the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Conventions, the Ten Principles of the UN Global Compact, as well as international best practices in sustainability.

### Purchasing policy

The Purchasing Policy, approved by the Board of Directors and available on its **website,** establishes the principles of conduct adopted by the company in the management of its supply chain, in order to ensure that the relationships established with suppliers are developed in line with the company's values and with the guidelines set out in its Code of Conduct. The scope of the Purchasing Policy covers all commercial relations with third parties of the Ence Group and its investee companies, across all its lines of business. The principles stipulated in the Policy are applicable to the Ence's whole supply chain, from its direct suppliers and subcontractors to the supply chains of the aforementioned. Thus, direct suppliers and subcontractors must not only comply with, but also ensure compliance with the principles set out in the Policy throughout their supply chains.

The main principles of action included in this Policy include: regulatory compliance; respect for human rights; and diversity and equal opportunities. In addition, the following purchasing criteria are included in the Purchasing Policy:

- **Integration of environmental criteria in the purchasing process:** When selecting alternatives for the supply of products or services, Ence will integrate environmental criteria, assessing the impact in terms of waste generation, emissions, odour impact, noise, hazardous substances and greenhouse gas emissions and resource consumption (water, raw materials, energy, etc.) throughout their life cycle. In this respect, under equal technical and economic conditions, priority will be given to any suppliers that implement preventive measures to minimise the environmental impact of their activity.
- **Promotion of local purchasing:** Whenever technically and economically feasible, Ence undertakes to prioritise purchasing from local suppliers in the areas in which it operates.

Furthermore, the Group establishes measures to prevent, mitigate and remedy any negative impact related to human rights in its supply chain, which include:

- **Sustainability due diligence policy and procedure:** For further information, see section ***4.4.3 Due diligence***.
- **Complaint mechanisms:** Confidential and secure channels for reporting human rights violations. For further information, see section ***4.2.3 Business conduct policies and procedures.***

- **Internal investigations:** Exhaustive processes for analysing and resolving any incidents reported.

- **Corrective measures:** Specific actions aimed at rectifying and preventing the recurrence of such incidents, including suspension or termination of commercial relations where necessary.

## 4.4.2 Supplier approval and evaluation process

Ence has various approval and evaluation processes depending on the nature of the suppliers. These which enable it to reduce the level of exposure to risks derived from its supply chain by extending its principles of business conduct to its suppliers and contractors.

### Industrial suppliers

The registration and approval process for industrial suppliers is carried out through the SAP ARIBA platform, which is available on the supplier portal (website). Approval is conducted through an questionnaire which includes aspects:

- Sustainability: with information on the existence of sustainability policies and other internal standards of business conduct. A formal statement to be filled in by suppliers is also included. In this statement, they undertake to comply with the ethical and behaviour standards, such as the United Nations Guiding Principles on Business and Human Rights, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the OECD Guidelines for Multinational Enterprises and the United Nations Global Compact.

- Tax and finance: with information on tax and bank details.

- Declaration of Conflicts of Interest.

Ence also analyses any potential compliance risks linked to suppliers by reviewing public sources such as sanctioning files of the National Commission on Markets and Competition (CNMC) or lists of individuals, groups and entities subject to EU sanctions.

With regard to the **evaluation** the Purchasing department, together with other areas, evaluates every year those suppliers whose annual turnover exceeds €100,000 or whose activity is considered critical, even if they do not reach this volume. The evaluation analyses aspects related to quality (compliance with technical specifications), cost, delivery times, service (customer focus, flexibility and adaptability), health and safety, environment and compliance. Ence creates action plans with suppliers that require improvement based on the assessment. If the supplier fails to comply with the plan, the Code of Conduct of third parties, internal policies or quality, environmental and safety standards, it may be de-approved and cease to work for Ence. The process of registration, approval and evaluation is set out in the Supplier Management Procedure.

In addition, any suppliers accessing Ence's industrial facilities must be registered on CTAIMA, a specific platform for the coordination of business activities regarding health and safety matters.

### Agroforestry suppliers

The approval process for Ence's wood and biomass supply and harvesting suppliers consists of two fundamental steps: first, an **initial evaluation** based on the information provided by the supplier through a questionnaire, and second, a **risk analysis** in which a risk level is assigned to each supplier. Depending on this level, in the case of wood and biomass suppliers of pulp bio-factories, it is determined whether the supplier must participate in Origin Verification Programme, which aims to reduce the risks. As regards biomass suppliers of power plants or the *trading* business, an annual inspection plan is drawn up for any suppliers identified as being a risk.

The approval of wood and biomass suppliers is valid for up to two years, although this period may be shorter and suppliers must obtain a new approval if there are changes in the regulations or in the supplier's conditions. The approval questionnaire is part of the contract between Ence and the supplier, and includes social and environmental criteria, as well as supplier identification data; furthermore, a statement of the material's origin is included for material suppliers. In the case of environmental and forestry service providers, an approval process is followed by means of a specific questionnaire and this is valid for five years.

To ensure compliance with these commitments, Ence establishes processes to anticipate and deal with possible breaches by its suppliers in relation to applicable regulations and the company's internal procedures. If a supplier fails to comply and correct any deficiencies, it may be temporarily or permanently de-approved, which would prevent it from continuing to work with Ence.

### Sustainable wood and biomass management

Furthermore, as regards wood and biomass, Ence has established a sustainable management system that includes principles of responsible management for wood biomass; certification requirements and control systems for the traceability of wood and biomass. In addition, for power plants, this system also includes other **voluntary sustainability requirements** related to non-competition such as:

- Do not purchase agricultural biomass derived from energy crops, unless its use for animal or human consumption is not feasible.

- The purchase of agricultural biomass does not lead to a decrease in the quantities earmarked for livestock uses or livestock feed.

- Do not buy roundwood or roundwood chips unless it cannot be used for anything other than energy.

It has implemented an audit and inspection procedure to verify the functioning of the system.

### Responsible wood and biomass

To ensure that wood and forest biomass come from responsible sources and comply with current regulations, Ence has established a series of principles that align its operations with national legislation (Royal Decree 1088/2015 on wood legality) and current European regulations (EUTR Regulation 995/2010 on due diligence). In addition, in 2025, Ence has continued to work on adapting its systems and procedures

to comply with the new Regulation (EU) 2023/1115 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010. Among the measures to adapt to this new Regulation (known as the EUDR), Ence has worked on designing a platform to facilitate the administrative procedures for its forestry suppliers in order to comply with the new requirements, such as sending information and obtaining a Due Diligence Statement (DDS) from the system set up by the EU for this purpose. In 2026, Ence will adapt these measures to the revised EUDR, which incorporates modifications and simplifications in terms of DDD, among others.

In its Purchasing Policy, Ence undertakes to prioritise the use of wood from forests certified under the FSC® and PEFC schemes. It also seeks to promote the use of local wood and biomass to reduce its carbon footprint and generate economic and social benefits in the communities in which it operates.

For standing wood purchases, Ence guarantees compliance with agreements with landowners, acting transparently and responsibly in the management of forest harvesting, including the processing of permits with administrations, when necessary. In the case of biomass purchases at source from power plants, Ence checks that the necessary authorisations and permits are in place.

### Biomass with sustainability certificate

Ence uses waste biomass from industry, mainly from the agri-food industry, and waste agroforestry biomass to generate renewable energy both in its bio-factories and in its independent power plants, and in its renewable thermal energy sales and biomass trading businesses. Ence has three main sources of biomass supply: heritage woodlands, standing purchases and biomass from suppliers. In 2025, Ence consumed more than 1.5 million metric tons of local biomass, with most biomass originating from power plants in Andalusia, Extremadura, Castilla-La Mancha and Portugal, while most forest biomass derives from bio-factories in regions where wood also comes from (mainly Galicia and Asturias).

The Renewable Energy Directive establishes the criteria that biomass used in the bioenergy sector must meet to ensure sustainability, as well as criteria for the reduction of greenhouse gas emissions and energy efficiency. To comply, Ence has certified all its plants — both pulp and power plants — under the biomass sustainability certification scheme, **SURE System.** Certificates are available on the **website**.

MORE INFORMATION

ENCE'S WEBSITE

The certification of Ence companies would be insufficient if it were not accompanied by certification of the biomass consumed. In this regard, Ence works with its suppliers to ensure that the biomass consumed in the plants has this certification. At year-end, more than 99% of the biomass consumed in bio-factories and nearly 97% of that consumed in power plants was certified.

In addition to certifying its own facilities, Ence wanted to support its supply chain for certification to the same standard, taking two lines of action: certification of points of origin; and certification of suppliers.

With regard to points of origin, work is being done to ensure compliance at source with the sustainability requirements established by SURE, both those emanating from the Renewables Directive itself and the additional requirements that the scheme establishes for agricultural and forestry biomasses. Ence includes these points of origin in its own SURE certificate, thus avoiding the need for them to individually opt for their own certificate, which would be technically and economically unfeasible for the points of origin. With regard to biomass from suppliers, work is being carried out to ensure that suppliers have a SURE certificate that enables them to supply Ence with certified material and to ensure that this certificate is maintained in accordance with SURE. To this end, Ence has kept working to provide some suppliers with the necessary technical assistance for the implementation of the certification requirements, and accompanied them through the external audit process.

### Bio-methane with sustainability certificate

As with biomass, in the case of bio-methane production, the La Galera plant is already ISCC certified (*International Sustainability and Carbon Certification*), a voluntary sustainability scheme that allows compliance with the sustainability requirements established by the Renewable Energy Directive (EU) 2018/2001. In 2025, 99% of bio-methane generation met sustainability requirements.

### Traceability of wood and Biomass Monitoring

In addition to ensuring that all stakeholders in its supply chain comply with the sustainability criteria established, Ence focuses on ensuring full traceability of the wood and biomass used in its facilities to guarantee that it comes from responsible sources. To this end, in the case of wood, it has implemented a **wood Traceability Management System**, certified according to the most rigorous international chain of custody standards, such as those of the FSC® and PEFC. This guarantees the traceability of wood from its origin, whether purchased standing or at reception centres, until it is delivered to pulp customers. In addition, in 2025, Ence has continued to work to prepare its systems and procedures to comply with the EUDR Regulation, which requires traceability to the point of origin of all wood and forest biomass items used by the company, as well as the derived materials sold by Ence (such as pulp and biomass delivered to its *trading* customers). During 2026, Ence will continue to adapt its systems to the requirements of the revised EUDR.

As for biomass, Ence uses the Sure System, which is explained above and is also certified by an independent entity. It ensures the traceability of this material from its origin to its final use. Highlight that in 2025, PEFC certification (with licence number PEFC/14-31-00410) has been achieved to facilitate the sale of biomass to third parties (*trading* business). In the case of sales of PEFC certified biomass, customers are provided with accurate and verifiable information on the certified material content of the biomass supplied, and communicate information on its origin and the PEFC material declaration of the biomass sold.

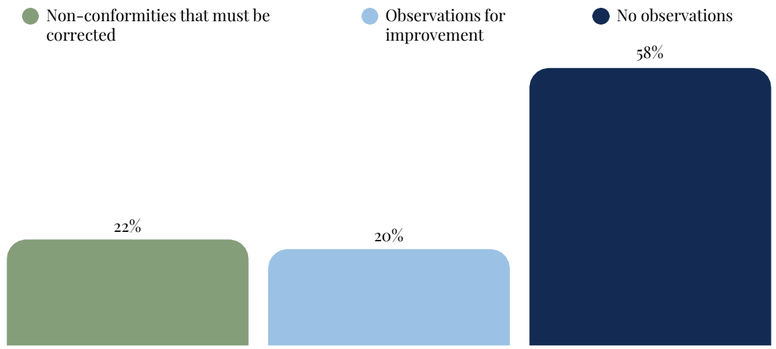
All this information is managed through the SAP platform, which collects details such as volumes, material type, densities, weighing dates and certification numbers, enabling accurate and continuous control. For wood purchased standing or from Ence-owned woodlands, the system ensures the legality of the origin of wood by guaranteeing the validity of the felling permits associated with each cadastral reference and also ensures traceability from the origin of wood to the end customer.

For biomass used in the generation of renewable energy, Ence has developed internal tools that guarantee its traceability to the source. Each item received has associated certified information, including certificate number and country of origin, according to the SURE scheme. In this way, Ence ensures traceability from the moment biomass is received at its facilities to the production of electricity, using a monthly mass balance system that records the inputs of sustainable biomass and the renewable energy produced.

*System of inspections and audits:*
Ence has implemented an audit and inspection procedure to verify the operation of its integrated management system and ensure its compliance with the applicable regulations and standards, such as those of the FSC® and PEFC chains of custody, and the requirements of the Renewable Energy Directive through the SURE scheme. The system includes:

- External audits, carried out by independent third parties.
- Internal audits, conducted by Ence's technical team or contracted suppliers, to review compliance with FSC®, PEFC, SURE, ISCC and other standards. These are carried out annually at Ence's centres.
- Documentary and field inspections, which Ence performs on a monthly basis to assess compliance with both its mandatory and voluntary sustainability requirements.
- Programme for verifying the origins of wood and biomass from pulp plants, which makes it possible to monitor compliance with legality and traceability requirements in order to minimise supply risks. Both this programme and the annual Inspection Plan for biomass supply in power plants define several lines of action, including:
  - **Documentary verification** for low-risk suppliers.
  - ***On-site* verification**, through visits to high-risk suppliers' facilities.
  - **Field verification**, with visits to plots of origin.
  - **Supplier inspections**, carried out by Ence's sustainability team to verify compliance with the SURE scheme.

**Results of the audits (%)**




In 2025, more than 742 audits and inspections were conducted to ensure compliance with sustainability requirements in wood and biomass supply, significantly exceeding the 2024 figures (570 audits).

## 4.4.3 Due diligence

### 4.4.3.1 DUE DILIGENCE POLICY AND PROCEDURE

In addition to its third-party Code of Conduct and Purchasing Policy, Ence has a **Sustainability Due Diligence Policy**, approved by the Board of Directors. This aims to ensure respect for human rights and protection of the environment in accordance with the main internationally recognised standards, guaranteeing that due diligence processes are established in these matters in both Ence's direct operations and its value chain. This Policy, approved in 2023, is one of the key components of the due diligence system that Ence implemented to anticipate the requirements derived from Directive (EU) 2024/1760 on corporate sustainability due diligence (known as CSDDD).

This Policy follows the principles recognised in international human rights frameworks:

- The United Nations (UN) International Bill of Human Rights.
- The UN Guiding Principles on Business and Human Rights.
- The ILO Declaration on Fundamental Principles and Rights at Work and its Conventions, which include forced labour, child labour and human trafficking, as well as other issues.
- The OECD Guidelines for Multinational Enterprises.
- The OECD Due Diligence Guidance for Responsible Business Conduct.
- The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- UN Human Rights Council Resolution 48/13 on the human right to a safe, clean, healthy and sustainable environment.
- The UN Sustainable Development Goals (SDGs).
- The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)

The principles of conduct of this Policy include management commitment to the effective implementation of due diligence; the cross-cutting integration of due diligence into all of the company's processes and systems; the regular assessment of potential risks and adverse impacts of direct operations and the supply chain; the establishment of controls for the prevention, management and mitigation of impacts; the establishment of reliable claim and dialogue mechanisms; and the implementation of remediation measures that respond to materialised and proven adverse impacts.

In addition, this Policy sets out priority areas for due diligence action (where the company could have the greatest impact). These include respect for human rights, minimising environmental impact, fighting against corruption and promoting fair and safe working conditions, as well as other areas. The scope of this Policy includes all employees, covering both those who are direct and in the value chain.

The implementation of this policy ensures proper identification, assessment, management and remediation of potential negative impacts on workers in the value chain. This Policy is available on the **website**.

Derived from the Policy, the **Due Diligence Procedure with third parties**, which establishes the guidelines to be followed to manage all business relationships with a view to ensuring compliance with basic principles in the areas of human rights, the environment, ethics and compliance.

#### 4.4.3.2 DUE DILIGENCE PROCEDURE ESCALATION PLAN

In line with the Due Diligence Procedure with third parties, Ence has established an area-based Escalation Plan to gradually deploy the Procedure in order to analyse the Group's commercial relations (suppliers, partners, collaborators), identifying potential risks and defining mitigation measures.

The objective is to achieve more than 90% of the turnover analysed in accordance with the Due Diligence Procedure by 2028, and this objective is included in the 2024-2028 Sustainability Master Plan. To achieve this, a specialised digital tool was implemented in 2025 to analyse third parties on ESG. This tool analyses the potential risk in environmental, social and governance aspects based on the sector and country where the entities to be analysed are located. In addition, it incorporates a robust adverse news search that identifies any negative ESG events. In 2025, 1,500 third parties were analysed, of which 91% were suppliers and the rest other business partners. Of the total number of suppliers, 0.67% were identified as risky, which, after risk mitigation measures, only 0.1% were considered risky as suppliers had robust ESG risk management systems in place.

In addition, Ence also has a digital tool for analysing ethics and compliance risks in the value chain. This tool makes it possible to obtain information about the company's administrators and executives, review adverse media reports, check their potential presence on national and international sanction lists, the company's existence of potential litigation, their possible links to politically exposed persons (PEPs) and the level of risk of the country in which they are based and the countries where they operate, based on corruption indices, among other factors. In 2025, 1,285 third parties are registered and monitored in the tool, 34% of which are high risk mainly due to the country of operation and industry.

### 4.4.4 Supplier payment practices

**Supplier payment practices (1)**

| Average payment period | Days |
|---|---|
| Average supplier payment period | 57 |
| Ratio of paid transactions | 58 |
| Ratio of outstanding transactions | 43 |
| % of payments | % |
| Payments made within the maximum legal deadline | 66% |
| No. of invoices within the maximum legal deadline | 72% |

(1 ) This information is available in the Consolidated Annual Accounts, section 26. Trade and other payables.

To improve efficiency in payment management, Ence offers its suppliers the use of the confirming financial service, among other payment terms. This system brings many benefits, such as allowing suppliers to collect payment for their invoices in advance, providing immediate liquidity and reducing payment uncertainty. Confirming is especially beneficial for small and medium-sized suppliers that need to improve their liquidity and reduce the risk of non-payment.

The main advantages of confirming for suppliers are:

- **Immediate liquidity**: suppliers can access their money before the invoice is due, improving their cash flow.
- **Reduced uncertainty**: guaranteed payment on or before the agreed date, if an advance payment is chosen.
- **Flexibility** in collections: suppliers can decide whether to collect payment in advance or wait for the set payment date, depending on their financial needs.
- **Access to debt-free financing:** Advance payment is not considered a loan, meaning that the supplier's level of indebtedness does not increase.

In 2025, the % of payments in line with payment terms reached 95%, including current payments (<=60 days) and payments that have been brought into line with payment terms through confirming.

At the end of 2025, Ence has 4 open legal proceedings related to delayed supplier payments. These are legal proceedings in which compliance with the contracts is under review and therefore the execution of the payment is subject to legal ruling.

## 4.5 Responsible taxation

The tax strategy of Ence consists of ensuring compliance with tax regulations applicable in all the territories in which it operates. This commitment is aligned with the desire to contribute to progress and social welfare, as well as to the sustained generation of shareholder value, minimising risks and fiscal inefficiencies in business decision-making.

## 4.5.1 Fiscal governance

Ence's Tax Policy, approved by the Board of Directors and applicable to all of the Ence Group's companies, reflects the commitment to good tax practices based on the principles of legality, prudence, collaboration, informing the Administration and contribution. This Policy is available on Ence's **website**.

**Good tax practices** fall into three main broad areas:

- Tax risk prevention.
- Relations with Tax Authorities.
- Information for the Board of Directors.

The commitments undertaken by Ence to prevent tax risk include the following:

- Encouraging practices aimed at preventing and reducing significant tax risks;
- Minimising conflicts in the interpretation of applicable regulations through the use of legal instruments;
- Avoiding the use of opaque structures, with the aim of reducing their tax burden;
- Not establishing or purchasing companies residing in tax havens or countries included on the list of non-cooperative jurisdictions of the European Union, for the purpose of circumventing tax obligations;
- Ensuring compliance with tax obligations in time and form, presenting its taxes appropriately, with all pertinent information and in accordance with the applicable regulations, and paying in due form and time all taxes enforceable in accordance with applicable laws;
- Undertaking for their normal market value, transactions between affiliated entities and complying with the obligations of documentation on transfer prices established by tax legislation;
- Providing customers and suppliers with clear, transparent and responsible information for the fulfilment of their tax obligations; and
- Making available to potential interested parties the necessary reporting channels allowing communication of conduct which may involve any irregularity or any action contrary to the law or the governance and sustainability System being committed.

Ence maintains a cooperative relationship with the tax authorities, based on transparency, good faith, cooperation and mutual trust.

Regarding **governance bodies** in charge of supervising, Ence's Board of Directors is empowered to formulate the Company's tax strategy, determine its tax risk control and management policy and approve its Corporate Policies. The **Audit Committee** supervises the effectiveness of the Company's internal control of Ence and Ence's internal control and tax risk management systems. This Committee reports to the Board on the tax policies and criteria applied by the Company during the financial year, and in particular, on the degree of compliance with the Corporate Tax Policy. Likewise, in the case of transactions or matters that must be submitted to the Board for approval, it reports on the tax implications of relevant transactions.

The **General Financial Management**, through the Corporate Tax Team, ensures compliance with regulations and the correct application of the general principles and good practices set out in the company's tax Policy, as well as for identifying and managing the possible associated risks. It is supported in this task by a team of external advisors specialised in taxation. The Corporate Tax Team reports at least twice a year to Ence's Audit Committee on the Group's tax performance.

## 4.5.2 Tax governance compliance

The monitoring of compliance with financial governance is organised around two lines of defence: the Compliance and Internal Audit departments, which review the systems for managing financial risks, including the internal control system for financial reporting (ICFR).

### Update on regulatory changes to mitigate tax risks

Given the dynamism of tax regulations, the Corporate Tax Team keeps up to date in collaboration with its external advisors, conveying relevant changes to the organisation in order to mitigate emerging risks. This information is regularly reported to the Audit Committee.

### Mechanisms for reporting potential irregularities

In line with its culture of ethics and compliance, Ence has made an **Integrity Line** available to its stakeholders, through which anyone can report irregular or unlawful conduct occurring in the course of the company's activities that contravenes its Code of Conduct or the legal framework currently in force, including relating to taxation.

For more information see sections ***Integrity Line*** and ***4.2.3 Business Conduct Policies and Procedures.***

ACCESS
INTEGRITY LINE

## 4.5.3 Responsible taxation

Ence has no presence in any territory classed as a tax haven according to the criteria of the Spanish Tax Agency (list Royal Decree 1080/91 updated in 2013 and Royal Decree 116/2003), or in any countries included in the EU list of non-cooperative jurisdictions for tax purposes or which have not fulfilled their commitments.

Likewise, Ence does not operate in any territories considered to be low tax jurisdictions in accordance with Order HFP/115/2023 of 9 February, which determines the countries and territories, as well as the harmful tax regimes, that are considered to be non-cooperative jurisdictions. Furthermore, it does not use opaque or artificial structures with the aim of reducing the tax burden applicable to its activity.

Ence has shareholdings in Uruguay linked to the Punta Pereira project, which was sold in 2009. These companies are totally inactive, have no relevant assets or employees, and are currently in the process of being dissolved.

## 4.5.4 Tax transparency

The tax strategy of Ence consists of ensuring compliance with tax regulations applicable in all the territories in which it operates. This commitment is aligned with the desire to contribute to progress and social welfare, as well as to the sustained generation of shareholder value, minimising risks and fiscal inefficiencies in business decision-making.

**Country-by-Country Report 2025**

| Tax Jurisdictions | Argentina | Spain | Portugal | Uruguay | Total |
|---|---|---|---|---|---|
| Number of resident entities | 1 | 61 | 1 | 2 | 65 |
| Number of Employees (31/12/2025) | - | 1,338 | 4 | - | 1,342 |
| Revenue from sales to third parties (thousands of €) | - | 746,871 | 381 | - | 747,252 |
| Revenue from intra-group transactions between and with other tax jurisdictions (thousands of €) | - | - | 8,567 | - | 8,567 |
| Tangible assets other than cash and cash equivalents (thousands of €) | - | 1,167,312 | 1,169 | 120 | 1,168,601 |
| Corporate income tax settlement | | | | | |
| Accounting result before tax (thousands of €) | - | -82,199 | 281 | -0.3 | -81,918 |
| Net amount (Tax on profit paid) (thousands of €) | - | -3,518 | 0 | 0 | -3,518 |
| Profit tax (expense / (income)) | | | | | |
| Current tax (thousands of €) | - | 540 | 0 | 0 | 540 |
| Deferred tax (thousands of €) | - | -19,956 | 0 | 0 | -19,956 |
| Effective rate (%) | - | 25% | 21% | 25% | - |
| Nominal rate (%) | - | 25% | 21% | 25% | - |

Ence not only adds value to the economy, but also to society contributing through responsible tax action to supporting public duties in those territories in which it operates through the payment of applicable taxes.

Most of Ence's **tax contributions** are carried out in Spain. In 2025, the direct and indirect contribution, broken down by Autonomous Community, was as follows:

**Direct and indirect contribution [1] by Autonomous Community**

| Thousands of Euros | Spain | | | | | | | Portugal | Total |
|---|---|---|---|---|---|---|---|---|---|
| | Andalusia | Asturias | Castile La Mancha | Catalonia | Extremadura | Galicia | Madrid and other | | |
| Property Tax | 572 | 31 | 72 | 16 | 20 | 95 | 0 | 0 | 805 |
| Trade Tax | 693 | 383 | 71 | 0 | 15 | 320 | 20 | 0 | 1,501 |
| Fees | 79 | 281 | 30 | 1 | 15 | 1,674 | 30 | 0 | 2,109 |
| PTT and Stamp duty | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 0 | 3 |
| Environmental levy | 238 | 212 | 57 | 0 | 46 | 1,270 | 0 | 0 | 1,823 |
| Corporate Income Tax | 108 | 0 | -191 | 0 | 0 | -3,184 | -251 | 0 | -3,518 |
| Tax on electricity generation | 8,381 | 2,193 | 2,940 | 0 | 1,562 | 57 | 0 | 0 | 15,134 |
| IH purchase of fuel | 0 | 130 | 0 | 0 | 0 | 284 | 0 | 0 | 414 |
| Special taxes on energy purchasing | 29 | 116 | 2 | 0 | 6 | 37 | 0 | 0 | 189 |
| Social security contribution | 2,974 | 7,889 | 347 | 57 | 833 | 6,896 | 2,652 | 0 | 21,648 |
| Withholdings | 2,554 | 8,051 | 336 | 46 | 589 | 6,315 | 6,164 | 1 | 24,057 |
| VAT | 11,712 | 19,204 | 2,775 | 0 | 1,057 | 1,241 | 174 | 0 | 36,164 |
| Special taxes on energy sales | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Social security - worker | 598 | 1,637 | 67 | 11 | 167 | 1,421 | 524 | 0 | 4,426 |
| **Total** | **27,938** | **40,127** | **6,507** | **130** | **4,310** | **16,425** | **9,316** | **1** | **104,754** |

(1) Direct contribution means those taxes that the company generates directly through its activity. Indirect taxation refers to taxes where society acts as a tax collector.

The data for 2024 can be found in *Appendix III Responsible taxation - Tax contribution - Tax contribution*.

## 4.5.5 Transfer prices

Transactions between affiliated companies are valued at market prices, applying the arm's length principle in accordance with the OECD Guidelines, where prices should be the same as those which would apply to any independent third parties that carry out the same transactions or in similar circumstances. To this end, the most appropriate valuation method is selected for each specific transaction in accordance with the principles set out in internal regulations and in the OECD.

### 4.5.6 Grants

| Project | Company | Site | Agency | Amount of aid |
|---|---|---|---|---|
| Axuda Moveis I (electric mobility programme) | ENCE | Pontevedra | INEGA | 7,246 |
| Energy Saving Certificates (ESCs) | CEASA | Navia | MITECO | 9,891,298 |
| | ENCE | Pontevedra | MITECO | 30,368,505 |
| Indirect costs $CO_2$ | CEASA | Navia | MINECO | 5,649,308 |
| | ENCE | Pontevedra | MINECO | 4,093,698 |
| Electro-intensive | CEASA | Navia | MINECO | 41,410 |
| | ENCE | Pontevedra | MINECO | 39,831 |
| Dual Vocational Training Programme | CEASA | Navia | SEPE | 10,297 |
| Lactalis decarbonisation project (Granada) (2026) | ENCE ENERGIA | Extremadura | MITECO | 4,239,114 |
| Lactalis decarbonisation project (Villarrobledo) (2026) | ENCE ENERGIA | Extremadura | MITECO | 4,034,810 |
| Photovoltaic plants | ENCE ENERGIA | Huelva dos | ANDALUSIAN AGENCY | 110,418 |
| | ENCE ENERGIA | Puertollano | ANDALUSIAN AGENCY | 110,418 |
| Torres Quevedo Programme (R&D) | Ence R&D | Ence R&D | AEI (AGENCESTINV) | 26,396 |
| **Total result** | | | | 58,622,747 |

This includes additions of grants received during the financial year, of both a capital and operating nature, net of expenses.

Details of grants received in 2025 may be found in ***Appendix III Responsible Taxation - Grants.*** In addition, the list of Ence Group companies can be found in ***Appendix III - Responsible taxation - Company name***. No grants have been received in any country other than Spain.

## 4.6 Relationship with administrations and other stakeholders

### 4.6.1 Institutional Relations Procedure

In 2025, Ence approved an **Institutional Relations Operating Procedure** with the aim of reinforcing the strategic role of these relations as a lever to support corporate objectives and consolidate the Group's reputation. This procedure establishes a common framework to ensure that interactions with public administrations, regulators and other bodies are conducted in a coordinated, professional, transparent and traceable manner. The procedure also reinforces integrity and ethical compliance, in line with the company's Code of Conduct and Anti-Corruption Policy. In this way, Ence contributes to maintaining a coherent and rigorous institutional dialogue with the community, in line with the current regulatory framework.

### 4.6.2 Institutional relations in the forestry and paper industry

In 2025, Ence has reinforced its commitment to open and constructive dialogue with key stakeholders in the **forestry sector**, including associations throughout the value chain, academic experts, public administrations, professional associations and civil society organisations. This effort has focused on valuing the role of forest stands both for their direct benefits and their contribution through the processing of forest products.

In this context, Ence Terra integrates a vision of forestry activity aimed at strengthening support to forest owners and collaborating companies through specific services, as well as promoting innovation in sustainable forest management. Ence Terra also seeks to bring the value of the forestry and eucalyptus sector closer to society, promoting lines of research and development that improve the productivity and sustainability of the forest masses. In addition, this initiative generates value in rural areas, promoting new development opportunities and contributing to solving structural challenges such as fragmentation of the territory (smallholdings) and rural abandonment. The aim is to promote active, sustainable and efficient forest management, providing long-term social and environmental value.

In 2025, Ence Terra has participated in **key events in the forestry sector**, such as Asturforesta '25, where it has deepened its 360º relationship with the owner and presented advances in R&D, training projects for forestry professionals and new improved plant materials, adapted to the current environment of its plantations.

Ence has also participated in relevant forums such as "O Encontro de Sober", where Ence once again showed its commitment to Galicia, to continue promoting sustainable forest management in the Galician woodland and in turn, to continue having a very positive socio-economic impact on rural areas. In addition, in 2025, Ence Terra launched a new mobile workshop service for forestry companies serving Galicia, Asturias and Cantabria. The aim of this initiative is to minimise the time that elapses between the occurrence of a machine breakdown and the resolution of the incident, thus favouring the continuity of forestry work and, therefore, increasing its efficiency and competitiveness. The mobile workshop service is provided thanks to agreements reached by the company with leading workshops in the sector. To facilitate operations, Ence Terra has developed a specific mobile application that allows forestry companies to report faults directly from the woodland, quickly and easily. This new service is complemented by another solution already available: the replacement machinery service. This option allows companies to continue business when a repair takes longer than expected. In these cases, Ence Terra provides the company with a machine on a temporary rental basis.

In 2025, the "En Primeira Persona do Rural" forum has continued to be held, making visible and supporting the important work of Galician and Asturian entrepreneurs whose activity is located in rural areas, in areas such as horticulture, beekeeping, training, oenology and social innovation for the recovery of villages.

**At a national level**, through ASPAPEL, whose chair was taken over in 2024 by Ence's Managing Director of Pulp, Jordi Aguiló, the company is actively involved in representing and promoting the interests of the Spanish **paper industry.** Ence, through ASPAPEL, participates in several committees of the European Confederation of Paper Industries (CEPI), such as the Forestry Committee, the Forestry Policy Committee, the Forestry Certification Committee, the committee for the implementation of the EU Deforestation Directive (EUDR) and the working group on the taxonomy of the European Union. It has also participated in normative and regulatory debate with institutions such as the EU on matters such as carbon farming and restoration.

In the field of the **Galician forestry industry**, Ence works with owners' associations, associations of forestry and forestry service companies, auctioneers and sawmills associations and forestry industry associations to advance in the consolidation of the wood value chain in Galicia, improving the value generation capacity of each of its links. Ence is a member of the Galician Wood and Design Cluster, the Galician Forest-Industry Association and the Provincial Association of Businessmen of the 1st Transformation of Wood in Lugo, through which it participates in the Galician Forestry Council. From these associations, it collaborates with the rest of the industry through numerous meetings, working committees, joint arguments, communication actions and other projects. In 2025, the collaboration of the Galician Institute of Occupational Safety and Health (ISSGA), Ence and associations of the Galician wood value chain involved in forestry operations (Fearmaga and LugoMadera) has been extended. The aim is to improve safety rates with shared tools and joint improvement actions.

In the **Asturian forestry industry**, the company works to strengthen the industry and increase the value it generates, maintaining ongoing and systematic contact with the various forestry associations of owners, service companies, auctioneers and industry, especially within the FADE (Asturian Federation of Entrepreneurs) Forestry Board, whose activities it has coordinated until October 2025. This Board is also part of the Asturias Forestry Council. Since 2020, Ence, together with the rest of the industry, has been working to make valuable contributions to the revision of the Asturias Forestry Plan, which is currently being processed.

In 2025, concern about the advance of woodland abandonment and the lack of management, even in eucalyptus plantations in some areas, led Ence to develop actions to share with forest owners how best to care for their plantation and obtain value in a sustainable way and to promote joint work between owners through management groupings. In this context, nearly 40 workshops have been held with landowners and associations, visits to woodlands managed by Ence and the forestry advisory service, extending its scope to the entire territory of Galicia and Asturias.

Ence is also committed to the **technological development** of the industry, having been part of the Board of Trustees of CETEMAS (Asturias Forestry and Wood Technology Centre), one of the leading forestry technology centres at a national level. In addition, through CEASA, the group's Asturian subsidiary, it has taken part in the Nutrigest project, an Innovation Operating Group to improve eucalyptus fertilisation and the circularity of the pulp process by analysing the possible use of externalities of the process to improve the nutrient situation in the soil.

## 4.6.3 Institutional relations in the energy industries

Ence is a member of several associations in the energy sector, including **APPA Renovables** (Association of Renewable Energy Companies), where it participates through its **APPA Biomass section**. In 2025, Guillermo Negro, CEO of Magnon, was elected president of APPA Biomass. His mandate focuses on promoting biomass as a manageable renewable technology that is essential for achieving Spain's energy and decarbonisation objectives.

In addition, the company has joined **ANESE** (National Association of Energy Services Companies), with the aim of strengthening its position as a key player in supporting the decarbonisation of other industries. Through Magnon, Ence acts as an energy services provider.

In addition, Ence is a member of BIOCIRC (Spanish Biocircularity Association), an association created in 2024 within the framework of Bioplat, the Spanish Biocircularity Technology and Innovation Platform, in which has been collaborating for several years. This new business association covers the entire biocircularity industry, from bioenergy, biofuels and synthetics to biogases and bioproducts. Ence is represented on all five committees.

The company is also a member of the Spanish $CO_2$ Technology Platform ($PTCO_2$). This platform promotes the development of technologies to capture, transport, store, use and transform $CO_2$ in Spain. Representatives from the private sector, research centres, universities and ministerial agencies are currently part of this initiative.

At **regional level**, Ence has joined the Catalonia Bioenergy Cluster (CBC), which represents the professional bioenergy sector in this Autonomous Community. The company is also part of the Galician Climate Pole Alliance, an initiative promoted by the Xunta de Galicia that seeks to contribute to improving the environment and curb the effects of climate change in the Galician community.

Ence is a member of the Spanish Gas Association (SEDIGAS), an association that brings together, among others, companies for the development of renewable gases to promote their role as a lever for decarbonisation. Ence is also part of the Spanish Biogas Association (AEBIG), whose scope of action includes all organisations, whether companies, institutions or other entities, that carry out activities in the renewable gas industry. In 2025, it applied for membership of the Andalusian Biogas Alliance A2BIO and is a founding member of the association "Andalusian Bio-methane Cluster", established in 2025.

In addition to its presence in these associations, Ence also participates in the sector's most important events. In 2025, it participated in the Renewable Gas Exhibition in Valladolid.

## 4.6.4 Political neutrality

The Ence Group maintains a strict policy of political neutrality, refraining from making any financial or in-kind donations to political parties, political candidates or related foundations that may be construed as political contributions. This stance reinforces its commitment to transparency, business ethics and respect for the independence of democratic institutions.
Furthermore, no member of the Company's administrative, management or supervisory bodies has previously held any position in the public administration. The Institutional Relations area is responsible for overseeing all relations with the institutions. This area reports directly to the Chairperson and Managing Director.

Nonetheless, Ence is not registered in the European Union Transparency Register or in any equivalent registers in other jurisdictions. This register is intended to ensure transparency in relations between the EU institutions and organisations seeking to influence the legislative or policy-making process. Not registering reflects the fact that Ence does not carry out representative or lobbying activities aimed at directly influencing public policy at a European level, maintaining its focus on operating within the established regulatory framework in line with its ethical and corporate responsibility principles.
Lastly, in 2025, Ence has earmarked more than €530,000 for the payment of association and foundation fees (€410,000 in 2024).

## 4.7 Cybersecurity

Cybersecurity continues to be a strategic priority for Ence, which remains firmly committed to strengthening its capabilities to detect, protect against, respond to and recover from potential IT threats.

### 4.7.1 Governance and Organisation

The **Cybersecurity Committee**[38] is in charge of defining and supervising the corporate strategy in this area, as well as promoting training and raising awareness among the entire workforce. In 2025, progress has been made in the implementation of the Cybersecurity Plan (2024-2025), which covers both IT (information technology) and OT (operational technology) systems. This Plan was developed with a specialised consultancy, following the regulatory framework of NIST (*National Institute of Standards and Technology of the USA*) and the international standard IEC/ISA 62443.

### 4.7.2 Cybersecurity Policies and Procedures

Ence has a **Management and Industrial Information Systems Security Policy**, which sets out the principles for the protection of information. Furthermore, the **Privacy Policy** is aimed at preserving the confidentiality, integrity and availability of data, reducing the associated cybersecurity risks. In 2025, a comprehensive review and update of the operational Contingency Plans and procedures was carried out, with the aim of ensuring the continuity of operations in the event of serious cybersecurity incidents. Among the existing schemes, two stand out above the rest:

- **The Cyber Attack Prevention Plan** aims to establish a comprehensive model of cybersecurity awareness and vigilance for all employees. It is based on four pillars: a cultural shock plan with visible and recurrent actions to keep employees alert to risks; a continuous measurement of behaviour through simulations of *phishing; controlled hacking; quizzes and rankings*; communicating vulnerabilities to those affected and responsible in mandatory meetings; periodic reaction tests with massive drills to evaluate procedures, timing and coordination; and a governance structure with weekly monitoring and fortnightly reports to senior management. The aim is for people, processes and technology to evolve in a coordinated manner, achieving proactive cybersecurity, assumed and practised by 100% of the staff, increasing Ence's protection, resilience and response capacity in the face of cyberattacks.

- **The Contingency Plan for a serious cybersecurity incident** establishes the master plan for dealing with serious cybersecurity incidents at Ence, defining the phases, responsibilities and key actions to ensure an effective and coordinated response. The process is structured in six phases: identification, analysis, containment, eradication, recovery and amelioration. Upon detection of an incident, users and systems notify IT/OT technicians, who assess the severity and activate measures such as isolation of affected areas and urgent communication to the chain of command. A Crisis Committee is convened to lead management, make decisions and coordinate with specialised cybersecurity companies. The plan includes the activation of manual procedures, internal and external communication, and documentation of evidence.

### 4.7.3 Training and Awareness-raising

Aware of the cybersecurity threats, Ence has reinforced its training and awareness-raising actions aimed at the entire workforce. Throughout 2025, training sessions, the implementation of specific protocols and cyber-attack drills have continued, contributing to the consolidation of a culture of security. As a result, there have been no incidents in 2025 that have compromised the security of the company or its employees.

38. The Committee consists of the CEO and Chairperson, the General Manager of Finance, the Managing Director of Cellulose, the Managing Director of Magnon, the Internal Auditing Director, the Technology Director and the Director of the Pulp Centre of Excellence.

## 4.7.4 Protection Technologies

| | OT Cybersecurity | IT Cybersecurity |
|---|---|---|
| 2025 Projects | ABB secure remote access implementation for MES support in Navia | Windows 11 migration |
| | OT Cybersecurity audits | Cybersecurity Scorecard |
| | Expansion of policies and procedures OT Cybersecurity Management Systems | Review and improvement of the Azure *Cloud* |
| | Implementation of an OT risk assessment system | Implementation of *Windows Hello*. Biometric access to computers. |
| | OT Cybersecurity Scorecard | Implementation of *PAM (Privileged Access Management).* |

In addition to awareness-raising initiatives, Ence has focused its efforts on reviewing and optimising the configurations and functionalities of the cybersecurity systems in place to ensure their effectiveness and level of protection. These actions have included evaluating *Trend Micro*'s MDR protection platform, *Microsoft*365 security consoles and updating *Firewall* perimeter and application policies and configurations.

### Agreements with third parties

Ence has strengthened its collaboration with the National Cybersecurity Institute (INCIBE), which provides assistance in the event of incidents, monitoring of IT assets, early warnings, information exchange and access to training resources. In the field of industrial safety, it maintains a partnership with the ISA (*International Society of Automation*), an organisation that sets cybersecurity standards and offers specialist training programmes.

### Audits – Ethical *Hacking*

Ence carries out regular cybersecurity audits and ethical *hacking* tests. The aim is to detect vulnerabilities and establish improvement plans. In 2025, they have focused on the execution of monthly automated tests: detection of vulnerable user keys; Black Box and Grey Box audits, to identify and correct vulnerabilities; simulations of *Ransomware*-type attacks; and identification of vulnerabilities in IT assets exposed to the Internet.

Additionally, in 2025, OT cybersecurity technical audits have been carried out in all industrial facilities. The objective is to analyse the level of maturity and network architecture, assessing security controls according to international standards (IEC/ISA 62443 and NIST 800-82); as well as to detect existing vulnerabilities. As a result of these audits, individual improvement plans have been developed for each facility and the OT Cybersecurity Master Plan has been updated with cybersecurity *best practices.*

# 05 | APPENDIXE



# Appendix I Construction of taxonomy KPIs

The proportion of eligible and aligned sales, OpEx and CapEx is calculated as set out in Article 8(2) of Regulation (EU) 2020/852:

- **Eligibility**: the percentage of Sales, OpEx and CapEx derived from eligible activities in accordance with the criteria set out in Delegated Regulation (EU) 2021/2139, Delegated Regulation (EU) 2022/1214, Delegated Regulation (EU) 2023/2485 and Delegated Regulation (EU) 2023/2486 (numerator) relative to the Group's total Sales, OpEx and CapEx for the financial year (denominator).

- **Alignment**: percentage of Sales, OpEx and CapEx from aligned activities according to the criteria set out in the above-mentioned Delegated Regulations (numerator) in relation to the Group's total Sales, OpEx and CapEx for the financial year (denominator).

In compliance with the provisions of Appendix 1 of Delegated Regulation 2021/2178 of 6 July 2021, the methodology for the calculation of the numerator and denominator of the required indicators is detailed below:

Denominator:

- **Sales**: Consolidated turnover of the Ence Group's various businesses recognised in accordance with International Accounting Standard (IAS) 1, paragraph 82(a), as adopted by Commission Regulation (EC) No 1126/2008. In this respect, the sections of the annual accounts relating to pulp, energy, forestry (including wood sales, biomass sales and other forestry sales) and other sales have been considered.

- **OpEx**: Non-capitalised direct costs that relate to research and development, building renovation measures, short-term leases, maintenance and repairs, as well as other direct expenses related to the day-to-day maintenance of property, plant and equipment assets by the company or a third party to whom activities are outsourced and that are necessary to ensure the continued efficient operation of these assets. In this respect, the sections of the annual accounts relating to research and development, repairs and maintenance and leases have been considered.

- **CapEx**: This includes additions to tangible and intangible assets during the financial year considered before depreciation, amortisation and any possible revaluations, including those resulting from revaluations and impairments, for the relevant financial year, excluding changes in fair value. The denominator also includes additions to tangible and intangible assets resulting from business combinations. In order to analyse the nature of asset additions, the list of 2025 investment projects (analysed according to their eligibility) has been used as a basis and reconciled with accounting after adjustments to avoid double counting.

Numerator:

in the case of the numerator, three calculation criteria are established to report the three indicators stipulated in the Delegated Regulation:

- **Eligible and aligned activity**: the numerator corresponds to the proportion of Turnover (sales), operating expenditure (OpEX) or capital expenditure (CapEx) included in the denominator corresponding to any activities that fit the taxonomy description and meet the criteria of substantial contribution to one or more of the environmental objectives, DNSH and the minimum social safeguards.

- **Eligible and non-aligned activity**: the numerator corresponds to the proportion of Turnover (sales), operating expenditure (OpEX) or capital expenditure (CapEx) included in the denominator corresponding to any activities that fit the taxonomy description, but which, following assessment, are proven to not meet the criteria of substantial contribution, DNSH and/or the minimum social safeguards. For each of the eligible but non-aligned activities, the reasons for which the alignment criteria have not been met are stated.

- **Non-eligible activity**: the numerator corresponds to the proportion of turnover (sales), operating expenditure (OpEX) or capital expenditure (CapEx) of activities that do not meet any of the taxonomy definitions of Delegated Regulations (EU) 2021/2139, 2022/1214, 2023/2485 and 2023/2486 at the date of closure of this report.

When undertaking these calculations, Ence has applied the necessary supervision and control measures to ensure the consistency of the process and the traceability of the information, and to avoid double counting of any item[39]. The currency used throughout has been the Euro (the Group's functional currency) and the information has been reviewed and reconciled with the annual financial statements.

39. Supervision and control measures implemented to avoid double counting and ensure consistency and traceability of the process include the elimination of intercompany balances, disaggregated analysis by company and project in the case of CapEx, reconciliation of the cost accounting with the consolidated information in the Financial Statements and review of calculations by independent areas (planning and control, consolidation and sustainability) in accordance with the Corporate Procedure established for this purpose.

# Appendix II Double materiality assessment

The assessment of double materiality has been based on a scoring system with a quantitative rating on a scale of 0 to 5 for both impacts and risks and opportunities. A materiality threshold has been defined to determine whether an IRO is considered material or not. Thus, the average of grouped IROs (corresponding to a material issue) has been considered as non-material when its valuation is below 1.5.

### Impact materiality analysis

The purpose of this analysis is to assess the impact that Ence's activities may have on the environment, differentiating between positive and negative, real and potential impacts. The score is calculated on the basis of severity (a variable in turn composed of magnitude[40], scope[41] and irremediability[42]) and the probability[43] of occurrence. For current impacts only severity is considered, while for potential impacts both factors are weighted.

### Analysis of financial materiality

In the financial sector, materiality is assessed on the basis of the magnitude[44] and the likelihood of a risk or opportunity materialising, with both factors being weighted equally. This assessment makes it possible to identify the issues that may influence Ence's economic performance in the short, medium and long term, and to guide strategic decision-making.

### Definition of material issues

The 10 material issues relevant to Ence as a result of the grouping of the IROs assessed are summarised below:

- **Climate change mitigation and adaptation:** Climate change is a strategic core concept for Ence, both because of its potential impact on the viability of its operations (such as the effect on forestry plantations) and because of the contribution of its activities to greenhouse gas emissions. In this regard, on the one hand, Ence has mitigation measures included in its Decarbonisation Plan and, on the other hand, it integrates climate adaptation measures in its planning to strengthen operational resilience. Its business model is geared towards facilitating the energy transition, offering renewable solutions that replace fossil-based materials and contribute to the decarbonisation of energy-intensive industrial sectors.
- **Pollution prevention**: Preventing negative environmental impacts on air, water and soil is a priority for Ence, given their effect on the environment and the social acceptance of its operations. The company applies stringent environmental management systems to reduce emissions and improve environmental performance beyond regulatory compliance. In addition, special attention is paid to specific aspects such as odour and noise management (*entity-specific*), which are relevant in Ence's operational context.
- **Water management:** Efficient water management is critical for Ence, especially in its pulp production activity, which is intensive in the use of this resource. The company promotes a responsible approach, aimed at reducing consumption, reusing water and protecting local water resources, with the objective of minimising its water footprint by reducing its dependence on natural water sources and ensuring the sustainability of its operations.
- **Biodiversity**: Biodiversity conservation is a key issue for Ence, given its forestry activity and dependence on ecosystem services. The company manages its natural resources responsibly, promoting practices that minimise impacts on habitats and species, and encouraging the restoration of areas of high ecological value.
- **Circular economy:** Ence integrates circularity as a cross-cutting principle in its business model, optimising the use of renewable resources, recovering by-products and minimising waste generation. This strategy reduces dependence on finite resources and maximises efficiency throughout the value chain.
- **Human capital management**: Human capital is a fundamental pillar for Ence. The company promotes a safe, healthy and motivating work environment by investing in training, professional development and measures to attract, retain and promote the well-being of its team.
- **Human rights in the value chain:** Commitment to human and labour rights is integrated into Ence's corporate culture. The company ensures compliance both in its operations and throughout its supply chain, through control mechanisms, supplier assessment and accessible reporting channels.
- **Relationship with local communities:** The generation of shared value and the maintenance of relationships of trust with the communities where Ence operates are essential to its sustainability. The company promotes open dialogue, identifies local needs and develops positive social impact programmes that contribute to the development of the environment. Within this material issue, the contribution to local communities is an entity-specific aspect of the Ence Group's business model.
- **Added value for the customer:** Ence is committed to offering sustainable, innovative and high added-value products, which is therefore an entity-specific material issue (*entity-specific*) of the Ence Group's business model. Continuous improvement and customer focus are key to maintaining high levels of satisfaction and competitive differentiation.
- **Responsible Governance:** Integrity, transparency and regulatory compliance are fundamental principles in Ence's management. The company has a strong governance framework and compliance policies that ensure ethical and responsible business conduct in all its activities and relationships.

40. *Magnitude means the degree to which the environment or people are affected. Its scale from 0 to 5 corresponds to a qualitative assessment with the following values in increasing order: zero, low, moderate, high, significant and very significant.*
41. *Scope is defined as the extent, size or number of elements affected by the impact. Its scale from 0 to 5 corresponds to the values in increasing order: zero, minimal, local, medium, generalised and global.*
42. *Irremediability is understood as the extent to which it is possible to reverse the negative impact generated. Its scale from 0 to 5 corresponds to the values in increasing order: N/A, relatively easy to remedy, remediable with effort, difficult to remedy (medium term), very difficult to remedy (long term) and irremediable.*
43. *Probability is defined as the likelihood of occurrence. Its scale from 0 to 5 corresponds to the values in increasing order: N/A, very unlikely, unlikely, possible, probable and very probable.*
44. *Magnitude in financial materiality is defined as the significance of the risk/opportunity to the company's objectives, profits, earnings or margin. Its scale from 0 to 5 corresponds to a qualitative assessment with the following values in increasing order: Zero, low, moderate, high, significant and catastrophic.*

# Appendix III - Environmental and social indicators

## Environmental indicators

### Air emissions

The following is a complete breakdown of the compounds emitted to air reported in PRTR included in the "other compounds" category of the table reported in section ***2.3.4 - Metrics - Atmospheric emissions***.

| Air Emissions (PRTR España, the State Emissions Register) | Methodology (1) | 2024 (2) | 2025 |
|---|---|---|---|
| | | Kg/year | Kg/year |
| Carbon monoxide (CO) | C | 24,334 | 24,050 |
| Manganese and its compounds (million) | M / C | 1,028 | 1,060 |
| Zinc and compounds (such as Zn) | M / C | 1,181 | 1,030 |
| Trichloroethylene | C | 175 | 161 |
| Chromium and compounds (such as Cr) | M / C | 63 | 68 |
| Copper and compounds (such as Cu) | M / C | 94 | 65 |
| Lead and compounds (such as Pb) | M / C | 119 | 61 |
| Nickel and compounds (such as Ni) | M / C | 62 | 35 |
| Total PRTR polycyclic aromatic hydrocarbons (total PRTR PAHs) | C | 50 | 23 |
| Cadmium and compounds (such as Cs) | M / C | 48 | 21 |
| Arsenic and compounds (such as As) | M / C | 155 | 6 |
| Cobalt and its compounds (Co) | M / C | 7 | 2 |
| Vanadium and its compounds (V) | M / C | 10 | 1 |
| Mercury and compounds (such as Hg) | M / C | 2 | 1 |
| Nitrous oxide (N2O) | F | 22,516 | 0 |
| Fluorine and inorganic compounds (such as HF) | F | 132 | 0 |
| Thallium and its compounds (Tl) | F | 6 | 0 |

### Waste parameters

The following is a complete breakdown of the discharge parameters reported in PRTR included in the category "other compounds" of the table reported in section ***2.3.4 - Metrics - Discharge parameters***.

| Discharge parameters (PRTR España) | Methodology (1) | 2024 (2) | 2025 |
|---|---|---|---|
| | | Kg/year | Kg/year |
| Zinc and compounds (such as Zn) | M / C | 576 | 1,680 |
| Fluorides (as total F) | M / C | 474 | 568 |
| Copper and compounds (such as Cu) | M / C | 28 | 306 |
| Nickel and compounds (such as Ni) | M / C | 7 | 125 |
| Arsenic and compounds (such as As) | M / C | 0 | 4 |
| Lead and compounds (such as Pb) | M / C | 0 | 4 |
| Mercury and compounds (such as Hg) | M / C | 0 | 4 |
| Cadmium and compounds (such as Cd) | M / C | 2 | 3 |
| Chromium and compounds (such as Cr) | M / C | 1 | 0 |

*(1) Facility level data are publicly available from the State Pollutant Release and Source Register (PRTR-Spain). The reporting of data at the facility level in PRTR-Spain is subsequent to the issue of the Sustainability Report, which could therefore be modified if more updated or accurate information becomes available at a later date. In case of discrepancies between the data published in the Sustainability Report and PRTR-Spain, the latter prevails as the official source.*

*(2) Updated data based on official data published in PRTR-España.*

## Carbon footprint

| Total Ence Group emissions | Units | Retrospective | | | | | | Milestones and target years | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Base year | Comparison | | | | | % Reduction vs 2018. | | % Reduction vs 2023 | |
| | | 2018 | 2023 | 2024 | 2025 | % N/ N-1 | Weight HC 25 | 2030 | 2035 | 2030 | 2035 |
| **Scope 1 gross GHG emissions** | **tCO2eq** | **288,553.5** | **231,764.9** | **209,784.4** | **222,576.1** | **6.1%** | **29%** | | | | |
| Scope 1 gross GHG emissions | tCO2eq | 288,553.5 | 231,764.9 | 209,784.4 | 222,576.1 | 6.1% | - | | | | |
| **Scope 2 GHG emissions** | **tCO2eq** | **223,588.3** | **26,768.7** | **43,112.2** | **52,736.4** | **22.3%** | | -55% | -75% | 230,463.80 | 128,035.40 |
| Market-based scope 2 gross GHG emissions (4) | tCO2eq | 223,588.3 | 26,768.7 | 43,112.2 | 52,736.4 | 22.3% | **7%** | | | | |
| Location-based Scope 2 gross GHG emissions | tCO2eq | (1) | 153,865.4 | 180,257.3 | 174,944.8 | -2.9% | - | | | | |
| **Scope 3 GHG emissions (5)** | **tCO2eq** | **307,116.3** | **352,053.2** | **543,394.7** | **483,365.1** | **-11.0%** | **64%** | | | | |
| Total gross indirect GHG emissions (scope 3) | tCO2eq | 307,116.3 | 352,053.2 | 543,394.7 | 483,365.1 | -11.0% | - | | | | |
| 1. Goods and services purchased | tCO2eq | | 158,831.7 | 173,226.3 | 155,686.4 | -10.1% | 21% | | | | |
| 2. Capital goods (2) | tCO2eq | | - | 3,079.0 | 3,664.4 | 19.0% | 0% | | | | |
| 3. Fuel and energy-related activities (not covered by scope 1 or 2) | tCO2eq | | 37,894.3 | 33,837.0 | 36,214.5 | 7.0% | 5% | | | | |
| 4. Upstream transport and distribution (3) | tCO2eq | | 116,393.1 | 226,242.6 | 187,924.5 | -16.9% | 25% | | | | |
| 5. Waste generated in operations | tCO2eq | | 1,833.3 | 1,179.3 | 2,091.3 | 77.3% | 0% | | | | |
| 6. Business travel | tCO2eq | | 250.5 | 286.2 | 288.3 | 0.7% | 0% | | | | |
| 7. Pendulum shift of employees (3) | tCO2eq | | 3,051.7 | 2,800.5 | 1,280.5 | -54.3% | 0% | -10% | -15% | 316,847.8 Categories 2 and 10 are not included in the target. | 299,245.2 Categories 2 and 10 are not included in the target. |
| 8. Upstream assets leased | tCO2eq | (1) | N/A | N/A | N/A | N/A | N/A | | | | |
| 9. Transport and distribution (3) | tCO2eq | | 33,525.4 | 21,162.7 | 15,245.8 | -28.0% | 2% | | | | |
| 10. Transformation of products sold (2) | tCO2eq | | - | 81,117.1 | 79,953.8 | -1.4% | 11.0% | | | | |
| 11. Use of products sold | tCO2eq | | 273.2 | 464.0 | 1,015.6 | 118.9% | 0% | | | | |
| 12. End-of-useful life treatment of sold products | tCO2eq | | N/A | N/A | N/A | - | N/A | | | | |
| 13. Downstream assets leased | tCO2eq | | N/A | N/A | N/A | - | N/A | | | | |
| 14. Franchises | tCO2eq | | N/A | N/A | N/A | N/A | N/A | | | | |
| 15. Investment | tCO2eq | | N/A | N/A | N/A | N/A | N/A | | | | |
| **TOTAL GHG Emissions (market-based)** | **tCO2eq** | **819,258.1** | **610,586.8** | **796,291.4** | **758,677.7** | **-4.7%** | **100%** | | | | |
| **TOTAL GHG emissions (location-based)** | **tCO2eq** | **(1)** | **737,683.5** | **933,436.5** | **880,886.0** | **-5.6%** | | | | | |

*(1) Figures not available*
*(2) Category of new emissions in the 2024 reporting period*
*(3) Well-to-Tank (hereinafter WTT) activities have been included in the calculation of emissions for these categories. These refer to the extraction of fossil fuels used upstream (category 4), in employee commuting (category 7), business travel (category 6) and upstream and downstream transport (category 9).*
*(4) Ence does not include any disposal, purchase, sale or transfer of carbon credits in the calculation of Scope 2 GHG emissions. Furthermore, Ence has not purchased any renewable electricity certificates, as the pulp and power plants are able to operate on a self-consumption basis depending on supply and demand.*
*(5) The proportion of Scope 3 emissions using a primary emission factor (data obtained directly from a supplier, customer or other business partner) is 4.6% and the proportion of scope 3 emissions using activity data from a primary source is 8%.*

## Biodiversity

### Protected flora and fauna

Listed and/or threatened flora in the woodlands of the north of the peninsula (N) and the woodlands of Andalusia (S)

| Scientific name | Dir. 92/43 | National catalogue | IUCN Red List | Andalusian catalogue | Galician catalogue | Asturias catalogue | Cantabrian catalogue | N/S |
|---|---|---|---|---|---|---|---|---|
| *Armeria velutina* | II, IV | LESRPE | - | LESRPE | - | - | - | Y |
| *Arnica montana* | Appendix V | - | LC | - | - | - | - | N |
| *Asplenium billotii* | - | - | - | LESRPE | - | - | - | Y |
| *Blechnum spicant* | - | - | LC | - | - | - | - | Y |
| *Carex acuta* | - | - | LC | - | - | - | - | Y |
| *Dianthus hinoxianus* | - | - | - | VU | - | - | - | Y |
| *Dryopteris aemula* | - | - | LC | - | VU | - | IE | N |
| *Erica andevalensis* | - | - | NT | LESRPE | - | - | - | Y |
| *Erica lusitanica* | - | - | LC | - | - | - | - | Y |
| *Fuirena pubescens* | - | - | LC | - | - | - | - | Y |
| *Ilex aquifolium* | - | - | LC | - | - | IE | IE | N |
| *Isoetes durieui* | - | - | LC | VU | - | - | - | Y |
| *Loeflingia baetica* | - | - | - | LESRPE | - | - | - | Y |
| *Narcissus bulbocodium* | Appendix V | - | LC | - | - | - | - | N |
| *Narcissus cyclamineus* | Appendix II | LESRPE | LC | - | VU | - | IE | N |
| *Narcissus pseudonarcissus nobilis* | Appendix II | LESRPE | LC | - | VU | IE | IE | N |
| *Narcissus triandrus* | Appendix II | LESRPE | LC | - | - | - | IE | N |
| *Osmunda regalis* | - | - | LC | - | - | - | - | Y |
| *Pinguicula lusitanica* | - | - | NT | - | - | - | - | Y |
| *Quercus canariensis* | - | - | NT | - | - | - | - | Y |
| *Quercus canariensis* | - | - | NT | - | - | - | - | Y |
| *Ruscus aculeatus* | Appendix V | - | LC | - | - | - | - | N |
| *Spiranthes aestivalis* | IV | LESRPE | DD | - | - | - | - | Y |
| *Ulex minor* | - | - | LC | - | - | - | - | Y |
| *Woodwardia radicans* | Appendix II | LESRPE | VU | - | VU | IE | IE | N |
| *Narcissus triandrus* | Appendix II | LESRPE | LC | - | - | - | IE | N |
| *Osmunda regalis* | - | - | LC | - | - | - | - | Y |
| *Pinguicula lusitanica* | - | - | NT | - | - | - | - | N |
| *Quercus canariensis* | - | - | NT | - | - | - | - | Y |
| *Ruscus aculeatus* | Appendix V | - | LC | - | - | - | - | N |
| *Spiranthes aestivalis* | IV | LESRPE | DD | - | - | - | - | Y |
| *Ulex minor* | - | - | LC | - | - | - | - | Y |
| *Woodwardia radicans* | Appendix II | LESRPE | VU | - | VU | IE | IE | N |

Listed and/or threatened fauna in the woodlands of the north of the peninsula(N) and the woodlands of Andalusia (S)

Threatened species of fauna in the mountains managed by Ence of the northern Iberian Peninsula (N) and the woodlands of Andalusia (S)

| Type | Scientific name | Common name | 1 | 2 | 3 | 4 | 5 | 6 | 7 | N/S |
|---|---|---|---|---|---|---|---|---|---|---|
| Amphibians and reptiles | *Alytes cisternasii** | Iberian midwife toad | IV | RPE | NT | LAESPE | - | - | - | Y |
| | *Alytes obstetricans* | Common midwife toad | IV | RPE | NT | - | - | - | - | N |
| | *Anguis fragilis* | Slow worm | - | RPE | LC | - | - | - | - | N |
| | *Bufo spinosus* | Common toad | - | - | LC | - | - | - | - | N/S |
| | *Chalcides bedriagai* | Bedriaga's skink | IV | RPE | NT | LAESPE | - | - | - | Y |
| | *Chalcides striatus* | Western three-toed skink | - | RPE | LC | - | - | - | - | N |
| | *Chioglossa lusitanica** | Long-tailed salamander | II,IV | VU | VU | - | VU | - | - | N |
| | *Discoglossus galganoi** | Iberian painted frog | II,IV | RPE | LC | LAESPE | - | - | - | N/S |
| | *Epidalea calamita* | Natterjack toad | IV | RPE | LC | LAESPE | - | - | - | N/S |
| | *Hyla meridionalis* | Mediterranean tree frog | IV | RPE | NT | LAESPE | - | - | - | Y |
| | *Hyla molleri* | Iberian tree frog | IV | RPE | NT | - | VU | - | VU | N |
| | *Lacerta bilineata* | Green lizard | IV | RPE | LC | - | - | - | - | N |
| | *Lacerta schreiberi** | Iberian emerald lizard | II,IV | RPE | NT | - | - | - | - | N |
| | *Lissotriton boscai** | Iberian newt | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Lissotriton helveticus* | Webbed newt | - | RPE | LC | - | - | - | - | N |
| | *Mauremys Leprosa* | Spanish pond turtle | II,IV | RPE | VU | LAESPE | - | - | - | Y |
| | *Natrix astreptophora* | Collared snake | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Natrix maura* | Viperine snake | - | RPE | LC | LAESPE | - | - | - | Y |
| | *Pelobates cultripes* | Iberian spadefoot toad | IV | RPE | NT | LAESPE | - | - | - | Y |
| | *Pelophylax perezi* | Common frog | M | - | LC | - | - | - | - | N/S |
| | *Pleurodeles walti* | Iberian ribbed newt | - | RPE | NT | LAESPE | - | - | - | Y |
| Amphibians and reptiles | *Podarcis bocagei* | Bocage lizard | - | RPE | LC | - | - | - | - | N |
| | *Podarcis muralis* | Rock Lizard | IV | RPE | LC | - | - | - | - | N |
| | *Podarcis vaucheri** | Andalusian Lizard | - | RPE | - | LAESPE | - | - | - | S |
| | *Psammodromus algirus* | Long-tailed lizard | - | RPE | LC | LAESPE | - | - | - | S |
| | *Iberian frog** | Iberian stream frog | IV | RPE | VU | - | VU | - | - | N |
| | *Grass frog* | European common frog | M | RPE | LC | - | VU | - | - | N |
| | *Salamandra salamandra* | Common Salamander | - | - | NT | LAESPE | - | - | - | N/S |
| | *Tarentola mauretanica* | Common gecko | - | RPE | LC | LAESPE | - | - | - | S |
| | *Timon lepidus* | Ocellated lizard | - | RPE | LC | - | - | - | - | N |
| | *Triturus marmoratus* | Marbled newt | IV | RPE | LC | - | - | - | - | N |
| | *Triturus pygmaeus* | Pygmy newt | - | RPE | VU | LAESPE | - | - | - | S |
| | *Vipera seoanei* | Seoane viper | - | - | LC | - | - | - | - | N |
| Birds | *Accipiter gentilis* | Northern Goshawk | - | RPE | LC | LAESPE | - | IE | - | N/S |
| | *Accipiter nisus* | Eurasian sparrowhawk | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Aeghitalos caudatus* | Myth | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Aegypius monachus* | Black vulture | I | VU | NT | VU | - | - | - | N/S |
| | *Alauda arvensis* | Skylark | - | RPE | VU | - | - | - | - | N |
| | *Alcedo atthis* | Kingfisher | I | RPE | EN | LAESPE | - | - | - | N/S |
| | *Alectoris rufa* | Red-legged Partridge | - | - | VU | - | - | - | - | N/S |
| | *Anas platyrhynchos* | Mallard | - | - | LC | - | - | - | - | N/S |
| | *Anthus pratensis* | Meadow pipit | - | RPE | - | LAESPE | - | - | - | N/S |
| | *Anthus trivialis* | Tree pipit | - | RPE | LC | - | - | - | - | N |
| | *Apus trivialise* | Common swift | - | RPE | VU | LAESPE | - | - | - | N/S |
| | *Apus pallidus* | Pallid swift | - | RPE | LC | LAESPE | - | - | - | S |

Listed and/or threatened fauna in the woodlands of the north of the peninsula(N) and the woodlands of Andalusia (S)

Threatened species of fauna in the mountains managed by Ence of the northern Iberian Peninsula (N) and the woodlands of Andalusia (S)

| Type | Scientific name | Common name | 1 | 2 | 3 | 4 | 5 | 6 | 7 | N/S |
|---|---|---|---|---|---|---|---|---|---|---|
| Birds | *Aquila adalberti* | Iberian imperial eagle | I | EN | EN | EN | - | - | - | Y |
| | *Aquila chrysaetos* | Golden eagle | I | RPE | NT | LAESPE | - | VU | VU | N/S |
| | *Ardea cinerea* | Grey heron | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Bubo Adalbert* | Eurasian eagle-owl | I | RPE | LC | LAESPE | - | - | - | Y |
| | *Buteo Adalbert* | Buzzard | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Caprimulgus europaeus* | Grey nightjar | I | RPE | LC | - | - | - | - | N |
| | *Caprimulgus ruficollis* | Red-necked nightjar | I | RPE | VU | LAESPE | - | - | - | Y |
| | *Carduelis carduelis* | European goldfinch | - | - | LC | - | - | - | - | N/S |
| | *Carduelis citrinella* | Yellow-headed bunting | - | RPE | NT | - | - | - | - | N |
| | *Cecropis daurica* | Daurian swallow | - | RPE | LC | LAESPE | - | - | - | Y |
| | *Cercotrichas galactotes* | Red-tailed warbler | - | RPE | EN | LAESPE | - | - | - | Y |
| | *Certhia brachydactyla* | Common treecreeper | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Cettia cetti* | Cetia nightingale | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Chloris chloris* | Greenfinch | - | - | LC | - | - | - | - | N/S |
| | *Ciconia ciconia* | White stork | I | RPE | LC | LAESPE | - | - | - | Y |
| | *Ciconia nigra* | Black stork | I | VU | VU | EN | - | - | - | Y |
| | *Cinclus cinclus* | European dipper | - | RPE | LC | - | - | - | - | N |
| | *Circaetus gallicus* | Short-toed snake eagle | I | RPE | LC | LAESPE | - | - | - | N/S |
| | *Circus aeruginosus* | Marsh harrier | I | RPE | - | - | - | - | - | N |
| | *Circus pygargus* | Montagu's harrier | I | VU | VU | VU | - | - | - | Y |
| | *Cisticola juncidis* | Zitting cisticola | - | RPE | NT | LAESPE | - | - | - | Y |
| Birds | *Columba palumbu* | Wood pigeon | II,III | - | LC | - | - | - | - | N/S |
| | *Corvus cora* | Large raven | - | - | LC | - | - | - | - | N/S |
| | *Corvus corone* | Black crow | - | - | LC | - | - | - | - | N |
| | *Coturnix corona* | Common quail | - | - | EN | - | - | - | - | N/S |
| | *Cuculus canorus* | Common cuckoo | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Curruca communis* | Common Whitethroat | - | RPE | LC | - | - | - | - | N |
| | *Curruca iberiae* | Western Subalpine Warbler | - | RPE | LC | LAESPE | - | - | - | Y |
| | *Curruca melanocephala* | Sardinian warbler | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Curruca undata* | Black-winged warbler | I | RPE | EN | LAESPE | - | - | - | N/S |
| | *Cyanistes caeruleus* | Blue tit | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Cyanopica cooki* | Iberian azure-winged magpie | - | RPE | LC | LAESPE | - | - | - | Y |
| | *Delichon urbicum* | Common house martin | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Dendrocopos major* | Great spotted woodpecker | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Elanus caeruleus* | Common kestrel | I | RPE | NT | LAESPE | - | - | - | Y |
| | *Emberiza calandra* | Corn bunting | - | RPE | LC | LAESPE | - | - | - | Y |
| | *Emberiza cia* | Rock bunting | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Emberiza cirlus* | Cirlus bunting | - | RPE | NT | LAESPE | - | - | - | Y |
| | *Emberiza citrinella* | Yellowhammer | - | RPE | EN | - | - | - | - | N |
| | *Erithacus rubecula* | European robin | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Falco peregrinus* | Peregrine falcon | I | RPE | LC | - | - | - | - | N |
| | *Falco subbuteo* | Eurasian hobby | - | RPE | EN | LAESPE | - | - | - | N/S |
| | *Falco tinnunculus* | Common kestrel | - | RPE | EN | LAESPE | - | - | - | N/S |
| | *Ficedula hypoleuca* | European Pied Flycatcher | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Fringilla coelebs* | Common chaffinch | - | - | LC | - | - | - | - | N/S |

Listed and/or threatened fauna in the woodlands of the north of the peninsula(N) and the woodlands of Andalusia (S)

Threatened species of fauna in the mountains managed by Ence of the northern Iberian Peninsula (N) and the woodlands of Andalusia (S)

| Type | Scientific name | Common name | 1 | 2 | 3 | 4 | 5 | 6 | 7 | N/S |
|---|---|---|---|---|---|---|---|---|---|---|
| Birds | *Galerida theklae* | Mountain lark | I | RPE | LC | LAESPE | - | - | - | Y |
| | *Gallinulla chloropus* | Redfish | - | - | LC | - | - | - | - | N/S |
| | *Garrulus glandarius* | Eurasian Jay | - | - | LC | - | - | - | - | N/S |
| | *Gyps fulvus* | Griffon vulture | I | RPE | LC | LAESPE | - | - | - | N/S |
| | *Haliaeetus albicilla* | European sea bream | I | - | - | - | - | - | - | N |
| | *Hieraaetus pennatus* | Booted eagle | I | RPE | LC | LAESPE | - | - | - | N/S |
| | *Hippolais polyglotta* | Melodious warbler | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Hirundo rustica* | Barn swallow | - | RPE | VU | LAESPE | - | - | - | N/S |
| | *Lanius meridionalis* | Southern grey shrike | - | RPE | EN | LAESPE | - | - | - | Y |
| | *Lanius senator* | Northern grey shrike | - | RPE | EN | LAESPE | - | - | - | Y |
| | *Larus fuscus* | Black-headed gull | - | - | LC | - | - | - | - | N |
| | *Larus michahellis* | Yellow-legged gull | - | - | NT | - | - | - | - | N |
| | *Linaria cannabina* | Linnet | - | - | LC | - | - | - | - | N/S |
| | *Lophophanes cristatus* | Blue tit | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Lullula arborea* | Woodlark | I | RPE | LC | LAESPE | - | - | - | N/S |
| | *Luscinia megarhynchos* | Common nightingale | - | RPE | LC | LAESPE | - | - | - | Y |
| | *Merops apiaster* | European bee-eater | - | RPE | LC | LAESPE | - | - | - | Y |
| | *Milvus migrans* | Black kite | I | RPE | LC | LAESPE | - | - | - | N/S |
| | *Milvus milvus* | Red kite | I | EN | EN | EN | - | - | EN | N/S |
| | *Monticola solitarius* | Blue rock thrush | - | RPE | LC | LAESPE | - | - | - | Y |
| | *Motacilla alba* | White wagtail | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Motacilla cinerea* | Cascade wagtail | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Muscicapa striata* | Grey flycatcher | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Neophron percnopterus* | Egyptian vulture | I | VU | VU | - | - | IE | VU | N |
| | *Nycticorax nycticorax* | Black-crowned night heron | I | RPE | NT | LAESPE | - | - | - | Y |
| | *Oenanthe hispanica* | Black-eared wheatear | - | RPE | NT | LAESPE | - | - | - | Y |
| | *Oenanthe oenanthe* | Wheatear | - | RPE | - | LAESPE | - | - | - | Y |
| | *Oriolus oriolus* | European golden oriole | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Otus scops* | European scops owl | - | RPE | VU | LAESPE | - | - | - | Y |
| | *Pandion haliaetus* | Osprey | I | VU | EN | - | - | - | - | N |
| | *Parus major* | Great tit | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Passer domesticus* | House sparrow | - | - | LC | - | - | - | - | Y |
| | *Passer hispanoliensis* | Brown sparrow | - | - | LC | - | - | - | - | Y |
| | *Periparus ater* | Coal tit | - | RPE | LC | - | - | - | - | N |
| | *Pernis apivorus* | European honey bee-eater | I | RPE | NT | - | - | - | - | N |
| | *Phalacrocorax carbo* | Great cormorant | - | - | LC | - | - | - | - | Y |
| | *Phoenicurus ochruros* | Black redstart | - | RPE | LC | - | - | - | - | N/S |
| | *Phoenicurus phoenicurus* | Red-tailed redstart | - | VU | LC | LAESPE | - | - | - | Y |
| | *Phylloscopus bonelli* | Western bonelli's warbler | - | RPE | LC | LAESPE | - | - | - | Y |
| | *Phylloscopus collybita* | Common chiffchaff | - | RPE | NT | LAESPE | - | - | - | N/S |
| | *Phylloscopus ibericus* | Iberian chiffchaff | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Phylloscopus trochilus* | Willow warbler | - | RPE | - | - | - | - | - | N |
| | *Pica pica* | Magpie | - | - | LC | - | - | - | - | N |
| | *Picus sharpei* | Iberian cock | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Poecile palustris* | Marsh tit | - | RPE | LC | - | - | - | - | N |
| | *Prunella modularis* | Dunnock | - | RPE | LC | LAESPE | - | - | - | N/S |

Listed and/or threatened fauna in the woodlands of the north of the peninsula(N) and the woodlands of Andalusia (S)

Threatened species of fauna in the mountains managed by Ence of the northern Iberian Peninsula (N) and the woodlands of Andalusia (S)

| Type | Scientific name | Common name | 1 | 2 | 3 | 4 | 5 | 6 | 7 | N/S |
|---|---|---|---|---|---|---|---|---|---|---|
| Birds | *Ptyonoprogne rupestris* | Eurasian crag martin | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Pyrrhocorax pyrrhocorax* | Red-billed chough | I | RPE | NT | - | - | - | - | N |
| | *Pyrrhula pyrrhula* | Eurasian bullfinch | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Regulus ignicapilla* | Striped wren | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Saxicola rubetra* | Whinchat | - | RPE | - | - | - | - | - | N |
| | *Saxicola rubicola* | European stonechat | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Scolopax rusticola* | Eurasian woodcock | II,III | - | DD | - | VU1 | - | - | N |
| | *Serinus serinus* | European serin | - | - | LC | - | - | - | - | N/S |
| | *Sitta europaea* | Eurasian nuthatch | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Spinus spinus* | Goldfinch siskin | - | RPE | NT | LAESPE | - | - | - | N/S |
| | *Steptopelia decaocto* | Turkish turtle dove | II | - | LC | - | - | - | - | Y |
| | *Streptopelia turtur* | European turtle dove | II | - | VU | - | - | - | - | N/S |
| | *Strix aluco* | Tawny Owl | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Sturnus unicolor* | Spotless starling | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Sturnus vulgaris* | Spotless starling | - | - | LC | - | - | - | - | N |
| | *Sylvia atricapilla* | Blackcap | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Sylvia borin* | Garden warbler | - | RPE | LC | - | - | - | - | N |
| | *Tringa ochropus* | Large sandpiper | - | RPE | LC | LAESPE | - | - | - | Y |
| | *Troglodytes troglodytes* | Wren | - | RPE | LC | LAESPE | - | - | - | N/S |
| | *Turdus merula* | Blackbird | - | - | LC | - | - | - | - | N/S |
| | *Turdus philomelos* | Song thrush | II | - | LC | - | - | - | - | N/S |
| | *Turdus viscivorus* | Mistle thrush | II | - | LC | - | - | - | - | N/S |

| Type | Scientific name | Common name | 1 | 2 | 3 | 4 | 5 | 6 | 7 | N/S |
|---|---|---|---|---|---|---|---|---|---|---|
| Birds | *Tyto alba* | Barn owl | - | RPE | NT | - | - | - | - | N |
| | *Upupa epops* | Eurasian hoopoe | - | RPE | LC | - | - | - | - | N/S |
| *Mammals* | *Apodemus sylvaticus* | Field mouse | - | - | LC | - | - | - | - | N/S |
| | *Arvicola sapidus* | Water rat | - | - | VU | - | - | - | - | N |
| | *Canis lupus* | Wolf | - | - | NT | - | - | - | - | N |
| | *Capreolus capreolus* | Roe deer | - | - | LC | - | - | - | - | N |
| | *Cervus elaphus* | Red deer | - | - | LC | - | - | - | - | N/S |
| | *Dama dama* | Fallow deer | - | - | LC | - | - | - | - | Y |
| | *Eliomys quercinus* | Garden dormouse | - | - | LC | - | - | - | - | N |
| | *Erinaceus europaeus* | European hedgehog | IV | - | LC | - | - | - | - | N/S |
| | *Felis silvestris* | Wildcat | - | RPE | NT | - | - | - | - | N |
| | *Genetta genetta* | Genet | M | - | LC | - | - | - | - | N/S |
| | *Herpestes ichneumon* | Egyptian mongoose | - | - | LC | - | - | - | - | Y |
| | *Lepus granatensis* | Iberian hare | - | - | LC | - | - | - | - | N/S |
| | *Lutra lutra* | Eurasian otter | II, IV | RPE | LC | LAESPE | - | - | - | N/S |
| | *Lynx pardinus* | Iberian lynx | II,IV | EN | CR | EN | - | - | - | Y |
| | *Martes foina* | Chamois | - | - | LC | - | - | - | - | N/S |
| | *Martes martes* | Pine marten | M | - | LC | - | - | - | - | N |
| | *Meles meles* | Badger | - | - | LC | - | - | - | - | N/S |
| | *Mustela erminea* | Ermine | - | RPE | DD | - | - | - | - | N |
| | *Mustela nivalis* | Weasel | - | - | LC | - | - | - | - | N/S |
| | *Mustela putorius* | Weasel | M | - | NT | - | - | - | - | N |
| | *Myoedes glareolus* | Bank vole | - | - | LC | - | - | - | - | N |
| | *Neovison vison* | American mink | - | - | NE | - | - | - | - | N |

Listed and/or threatened fauna in the woodlands of the north of the peninsula(N) and the woodlands of Andalusia (S)

Threatened species of fauna in the mountains managed by Ence of the northern Iberian Peninsula (N) and the woodlands of Andalusia (S)

| Type | Scientific name | Common name | 1 | 2 | 3 | 4 | 5 | 6 | 7 | N/S |
|---|---|---|---|---|---|---|---|---|---|---|
| Mammals | *Oryctolagus cuniculus* | Rabbit | - | - | VU | - | - | - | - | N/S |
| | *Sciurus vulgaris* | Red squirrel | - | - | LC | - | - | - | - | N |
| | *Sus scrofa* | Wild boar | - | - | LC | - | - | - | - | N/S |
| | *Talpa occidentalis** | Iberian mole | - | - | LC | - | - | - | - | N |
| | *Vulpes vulpes* | Red fox | - | - | LC | - | - | - | - | N/S |

*1. Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. Appendix II: species for whose conservation it is necessary to designate special areas of conservation. Priority species are indicated with an asterisk. Appendix IV: Species requiring strict protection. Appendix V: Species whose collection from the wild and whose exploitation may be subject to management measures. Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.*
*2. Royal Decree 139/2011, dated 4 February, for the development of the List of Wildlife Species under Special Protection Regime and the Spanish Catalogue of Threatened Species. RPE = included in the List of Wild Species under Special Protection Regime; PE = In danger of extinction and VU = Vulnerable, both in the Spanish Catalogue of Threatened Species.*
*3. Atlas y Libro rojo de los Anfibios y Reptiles de España (Pleguezuelos et al., 2002) and Libro Rojo de los mamíferos terrestres de España (Palomo et al., 2007): CR = Critically Endangered, EN = Endangered, VU = Vulnerable, NT = Near Threatened, DD = Data Deficient.*
*4.Andalusian Catalogue of Threatened Species (LAESPE): Decree 23/2012 of 14 February regulating the conservation and sustainable use of wild flora and fauna and their habitats. VU= Vulnerable. EN = Endangered*
*5. Decree 88/2007, dated 19 April, regulating the Galician Catalogue of endangered species. PE = Endangered, VU = Vulnerable.*
*6. Decree 32/90 of 8 March, creating the Regional Catalogue of endangered vertebrate fauna of the Principality of Asturias. VU = Vulnerable; SHab = Sensitive to habitat alteration; IntEsp = Special concern.*
*7. Decree 120/2008, dated 4 December, regulating the Regional Catalogue of Threatened Species of Cantabria. VU = Vulnerable; SHab = Sensitive to habitat alteration; IntEsp = Special concern. PE = Endangered*

## Protected woodlands

### Woodlands managed by Ence located in protected natural areas (Natura 2000 Network) in the northwest of the Iberian Peninsula

| UGF | PROTECTED AREA NAME | WOODLAND NAME |
|---|---|---|
| La Coruña | Carnota - Monte Pindo | Ferrañas |
| | Costa da Morte | Balares |
| | Serra do Careón | Estivada Santiso |
| | Serra do Careón | Estivada Santiso P |
| | Serra do Xistral | Fraga de Balboa |
| Lugo | Serra do Xistral | Castrillan |
| | Serra do Xistral | Coto Mouro |
| | Serra do Xistral | Lombo Zarrido |
| | Serra do Xistral | Rua |
| Pontevedra | Monte Aloia | Tui Regal |
| | Lérez River | Gargallons |
| | Lérez River | Redonde |
| | Tea River | Barcia de Mera |
| | Tea River | Maceira |
| | Tea River | Santa Marina Castelanes |
| | Serra do Cando | Piccolo Cerdedo |
| Asturias | Cabo Busto-Luanco | Caru (Verdicio) |
| | Penarronda-Barayo | Island |
| | Penarronda-Barayo | Island 2 |
| | Penarronda-Barayo | Valdepares |
| | Nalón River | Godos (Alv) |

## Woodlands managed by Ence located in protected natural areas (Natura 2000 Network) in the northwest of the Iberian Peninsula

| UGF | PROTECTED AREA NAME | WOODLAND NAME |
|---|---|---|
| Asturias | Nalón River | Godos (Alv) |
| | Navia river | Armental |
| | Porcía River | Molios Novos |
| | Sierra Plana De La Borbolla | Cuesta (Alv) |
| Cantabria | Cueva del Rejo | Collovera (J.V. Abanillas) |
| | Cueva del Rejo | Monte Rojo |
| | Cueva del Rejo | Rojo (J.V. Luey) |
| | Rías Occiden and Duna Oyambre | Rubin |

## Woodlands managed by Ence located in protected natural areas (Natura 2000 Network) in the south of the Iberian Peninsula

| Province | Natural Area | Woodland |
|---|---|---|
| Huelva | Western Andévalo | Las Cortecillas |
| | | LOS RUBIALES |
| | Tinto River Ecological Corridor | Carbonera and Others |
| | | Colonos Berrocal and Others |
| | | El Pastillo |
| | | El Rincon |
| | | Fontanar and Others |
| | | Las Arrayadas |
| | | Las Cumbrecillas |
| | | Sierra De Rite |
| | | Sierra De Rite II |
| | | Tabladilla and Others |
| | Doñana North and West | La Cañada |

## Woodlands managed by Ence located in protected natural areas (Natura 2000 Network) in the south of the Iberian Peninsula

| Province | Natural Area | Woodland |
|---|---|---|
| Huelva | Peñas de Aroche | Peñas II |
| | Rivera de Chanza | Pasada del Abad |
| | Sierra Aracena and Picos Aroche | Campillo Alto |
| | | Corte Sonoble and Others |
| | | El Bravo |
| | | El Calamon |
| | | El Palomar |
| | | Helechoso |
| | | La Zarzuela |
| | | Las Aliserillas |
| | | Los Agudos |
| | | Los Agudos II |
| | | Los Barrancos |
| | | Los Benitos |
| | | Los Umbrizos |
| | | Navafresno and Dehesa del Carrizal |
| | | Risco Del Hombre and Others |
| | | Santa Eulalia |
| | | Valdesotella |
| | Sierra Pelada and Rivera del Aserrador | Alcalabocinos III |
| | | Gil Marquez |
| | | La Bajena |
| Seville | Guadiamar River Ecological Corridor | Villa Emilia |

# In-house staff indicators

## Workforce profile

### Workforce at the end of 2025 by professional group, age, gender and country

| Professional group/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **CLERICAL WORKERS** | **16** | **35** | **0** | **0** | **51** |
| Up to 30 years old | 0 | 2 | 0 | 0 | 2 |
| From 31 to 50 years old | 6 | 18 | 0 | 0 | 24 |
| Over 50 years old | 10 | 15 | 0 | 0 | 25 |
| **SUPPORT AND IMPROVEMENT** | **51** | **44** | **0** | **0** | **95** |
| Up to 30 years old | 1 | 3 | 0 | 0 | 4 |
| From 31 to 50 years old | 29 | 23 | 0 | 0 | 52 |
| Over 50 years old | 21 | 18 | 0 | 0 | 39 |
| **GENERAL MANAGEMENT** | **56** | **21** | **0** | **0** | **77** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 20 | 11 | 0 | 0 | 31 |
| Over 50 years old | 36 | 10 | 0 | 0 | 46 |
| **MANAGERS** | **73** | **35** | **0** | **0** | **108** |
| Up to 30 years old | 1 | 3 | 0 | 0 | 4 |
| From 31 to 50 years old | 46 | 27 | 0 | 0 | 73 |
| Over 50 years old | 26 | 5 | 0 | 0 | 31 |
| **MAINTENANCE** | **138** | **1** | **0** | **0** | **139** |
| Up to 30 years old | 8 | 1 | 0 | 0 | 9 |
| From 31 to 50 years old | 98 | 0 | 0 | 0 | 98 |
| Over 50 years old | 32 | 0 | 0 | 0 | 32 |
| **OPERATORS** | **371** | **47** | **0** | **0** | **418** |
| Up to 30 years old | 30 | 15 | 0 | 0 | 45 |
| From 31 to 50 years old | 281 | 31 | 0 | 0 | 312 |
| Over 50 years old | 60 | 1 | 0 | 0 | 61 |
| **TEAM MANAGER** | **73** | **6** | **0** | **0** | **79** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 47 | 5 | 0 | 0 | 52 |
| Over 50 years old | 26 | 1 | 0 | 0 | 27 |
| **TECHNICIANS** | **227** | **144** | **3** | **1** | **375** |
| Up to 30 years old | 31 | 18 | 2 | 0 | 51 |
| From 31 to 50 years old | 142 | 112 | 1 | 1 | 256 |
| Over 50 years old | 54 | 14 | 0 | 0 | 68 |
| **Overall total** | **1,005** | **333** | **3** | **1** | **1,342** |

## Workforce at the end of 2024 by professional group, age, gender and country

| Professional group/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **CLERICAL WORKERS** | **16** | **35** | **0** | **0** | **51** |
| Up to 30 years old | 0 | 3 | 0 | 0 | 3 |
| From 31 to 50 years old | 9 | 19 | 0 | 0 | 28 |
| Over 50 years old | 7 | 13 | 0 | 0 | 20 |
| **SUPPORT AND IMPROVEMENT** | **47** | **35** | **0** | **0** | **82** |
| Up to 30 years old | 2 | 1 | 0 | 0 | 3 |
| From 31 to 50 years old | 26 | 26 | 0 | 0 | 52 |
| Over 50 years old | 19 | 8 | 0 | 0 | 27 |
| **GENERAL MANAGEMENT** | **57** | **19** | **0** | **0** | **76** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 26 | 13 | 0 | 0 | 39 |
| Over 50 years old | 31 | 6 | 0 | 0 | 37 |
| **MANAGERS** | **75** | **34** | **0** | **0** | **109** |
| Up to 30 years old | 0 | 4 | 0 | 0 | 4 |
| From 31 to 50 years old | 49 | 24 | 0 | 0 | 73 |
| Over 50 years old | 26 | 6 | 0 | 0 | 32 |
| **MAINTENANCE** | **136** | **1** | **0** | **0** | **137** |
| Up to 30 years old | 5 | 1 | 0 | 0 | 6 |
| From 31 to 50 years old | 104 | 0 | 0 | 0 | 104 |
| Over 50 years old | 27 | 0 | 0 | 0 | 27 |
| **OPERATORS** | **303** | **60** | **0** | **0** | **363** |
| Up to 30 years old | 25 | 14 | 0 | 0 | 39 |
| From 31 to 50 years old | 235 | 34 | 0 | 0 | 269 |
| Over 50 years old | 43 | 12 | 0 | 0 | 55 |
| **TEAM MANAGER** | **56** | **2** | **0** | **0** | **58** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 44 | 2 | 0 | 0 | 46 |
| Over 50 years old | 12 | 0 | 0 | 0 | 12 |
| **TECHNICIANS** | **215** | **150** | **2** | **2** | **369** |
| Up to 30 years old | 30 | 23 | 1 | 1 | 55 |
| From 31 to 50 years old | 133 | 117 | 1 | 1 | 252 |
| Over 50 years old | 52 | 10 | 0 | 0 | 62 |
| **Overall total** | **905** | **336** | **2** | **2** | **1,245** |

## Quality employment

*Breakdown of workforce by contract type*

**Workforce at the end of 2025 by contract type, age, gender, professional category and country**

| Type of contract/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **PERMANENT** | **956** | **311** | **3** | **1** | **1,271** |
| **CLERICAL WORKERS** | **16** | **30** | **0** | **0** | **46** |
| Up to 30 years old | 0 | 1 | 0 | 0 | 1 |
| From 31 to 50 years old | 6 | 15 | 0 | 0 | 21 |
| Over 50 years old | 10 | 14 | 0 | 0 | 24 |
| **SUPPORT AND IMPROVEMENT** | **47** | **40** | **0** | **0** | **87** |
| Up to 30 years old | 1 | 1 | 0 | 0 | 2 |
| From 31 to 50 years old | 26 | 21 | 0 | 0 | 47 |
| Over 50 years old | 20 | 18 | 0 | 0 | 38 |
| **GENERAL MANAGEMENT** | **56** | **21** | **0** | **0** | **77** |
| From 31 to 50 years old | 20 | 11 | 0 | 0 | 31 |
| Over 50 years old | 36 | 10 | 0 | 0 | 46 |
| **MANAGERS** | **73** | **35** | **0** | **0** | **108** |
| Up to 30 years old | 1 | 3 | 0 | 0 | 4 |
| From 31 to 50 years old | 46 | 27 | 0 | 0 | 73 |
| Over 50 years old | 26 | 5 | 0 | 0 | 31 |

| Type of contract/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **MAINTENANCE** | **128** | **1** | **0** | **0** | **129** |
| Up to 30 years old | 5 | 1 | 0 | 0 | 6 |
| From 31 to 50 years old | 91 | 0 | 0 | 0 | 91 |
| Over 50 years old | 32 | 0 | 0 | 0 | 32 |
| **OPERATORS** | **343** | **38** | **0** | **0** | **381** |
| Up to 30 years old | 16 | 9 | 0 | 0 | 25 |
| From 31 to 50 years old | 269 | 28 | 0 | 0 | 297 |
| Over 50 years old | 58 | 1 | 0 | 0 | 59 |
| **TEAM MANAGER** | **73** | **6** | **0** | **0** | **79** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 43 |
| From 31 to 50 years old | 47 | 5 | 0 | 0 | 52 |
| Over 50 years old | 26 | 1 | 0 | 0 | 27 |
| **TECHNICIANS** | **220** | **140** | **3** | **1** | **364** |
| Up to 30 years old | 27 | 14 | 2 | 0 | 43 |
| From 31 to 50 years old | 139 | 112 | 1 | 1 | 253 |
| Over 50 years old | 54 | 14 | 0 | 0 | 68 |

## Workforce at the end of 2025 by contract type, age, gender, professional category and country

| Type of contract/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **TEMPORARY** | **49** | **22** | **0** | **0** | **71** |
| **CLERICAL WORKERS** | **0** | **5** | **0** | **0** | **5** |
| Up to 30 years old | 0 | 1 | 0 | 0 | 1 |
| From 31 to 50 years old | 0 | 3 | 0 | 0 | 3 |
| Over 50 years old | 0 | 1 | 0 | 0 | 1 |
| **SUPPORT AND IMPROVEMENT** | **4** | **4** | **0** | **0** | **8** |
| Up to 30 years old | 0 | 2 | 0 | 0 | 2 |
| From 31 to 50 years old | 3 | 2 | 0 | 0 | 5 |
| Over 50 years old | 1 | 0 | 0 | 0 | 1 |
| **MAINTENANCE** | **10** | **0** | **0** | **0** | **10** |
| Up to 30 years old | 3 | 0 | 0 | 0 | 3 |
| From 31 to 50 years old | 7 | 0 | 0 | 0 | 7 |
| Over 50 years old | 28 | 9 | 0 | 0 | 37 |
| **OPERATORS** | **14** | **6** | **0** | **0** | **20** |
| Up to 30 years old | 12 | 3 | 0 | 0 | 15 |
| From 31 to 50 years old | 2 | 0 | 0 | 0 | 2 |
| Over 50 years old | | 0 | 0 | 0 | 0 |
| **TECHNICIANS** | **14** | **8** | **0** | **0** | **22** |
| Up to 30 years old | 7 | 4 | 0 | 0 | 11 |
| From 31 to 50 years old | 4 | 4 | 0 | 0 | 8 |
| Over 50 years old | 3 | 0 | 0 | 0 | 3 |
| **Overall total** | **1005** | **333** | **3** | **1** | **1,342** |

## Workforce at the end of 2024 by contract type, age, gender, professional category and country

| Type of contract/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **PERMANENT** | **864** | **301** | **2** | **2** | **1,169** |
| **CLERICAL WORKERS** | **16** | **30** | **0** | **0** | **46** |
| Up to 30 years old | 0 | 1 | 0 | 0 | 1 |
| From 31 to 50 years old | 9 | 16 | 0 | 0 | 25 |
| Over 50 years old | 7 | 13 | 0 | 0 | 20 |
| **SUPPORT AND IMPROVEMENT** | **43** | **29** | **0** | **0** | **72** |
| Up to 30 years old | 1 | 0 | 0 | 0 | 1 |
| From 31 to 50 years old | 24 | 22 | 0 | 0 | 46 |
| Over 50 years old | 18 | 7 | 0 | 0 | 25 |
| **GENERAL MANAGEMENT** | **57** | **19** | **0** | **0** | **76** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 26 | 13 | 0 | 0 | 39 |
| Over 50 years old | 31 | 6 | 0 | 0 | 37 |
| **MANAGERS** | **75** | **34** | **0** | **0** | **109** |
| Up to 30 years old | 0 | 4 | 0 | 0 | 4 |
| From 31 to 50 years old | 49 | 24 | 0 | 0 | 73 |
| Over 50 years old | 26 | 6 | 0 | 0 | 32 |
| **MAINTENANCE** | **123** | **1** | **0** | **0** | **124** |
| Up to 30 years old | 1 | 1 | 0 | 0 | 2 |
| From 31 to 50 years old | 95 | 0 | 0 | 0 | 95 |
| Over 50 years old | 27 | 0 | 0 | 0 | 27 |

**Workforce at the end of 2024 by contract type, age, gender, professional category and country**

| Type of contract/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **OPERATORS** | **285** | **41** | **0** | **0** | **326** |
| Up to 30 years old | 13 | 6 | 0 | 0 | 19 |
| From 31 to 50 years old | 230 | 23 | 0 | 0 | 253 |
| Over 50 years old | 42 | 12 | 0 | 0 | 54 |
| **TEAM MANAGER** | **56** | **2** | **0** | **0** | **58** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 44 | 2 | 0 | 0 | 46 |
| Over 50 years old | 12 | 0 | 0 | 0 | 12 |
| **TECHNICIANS** | **209** | **145** | **2** | **2** | **358** |
| Up to 30 years old | 26 | 19 | 1 | 1 | 47 |
| From 31 to 50 years old | 131 | 116 | 1 | 1 | 249 |
| Over 50 years old | 52 | 10 | 0 | 0 | 62 |

**Workforce at the end of 2024 by contract type, age, gender, professional category and country**

| Type of contract/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **TEMPORARY** | **41** | **35** | **0** | **0** | **76** |
| **CLERICAL WORKERS** | **0** | **0** | **0** | **0** | **0** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 0 | 0 | 0 | 0 | 0 |
| Over 50 years old | 0 | 0 | 0 | 0 | 0 |
| **SUPPORT AND IMPROVEMENT** | **4** | **6** | **0** | **0** | **10** |
| Up to 30 years old | 1 | 1 | 0 | 0 | 2 |
| From 31 to 50 years old | 2 | 4 | 0 | 0 | 6 |
| Over 50 years old | 1 | 1 | 0 | 0 | 2 |
| **MAINTENANCE** | **13** | **0** | **0** | **0** | **13** |
| Up to 30 years old | 4 | 0 | 0 | 0 | 4 |
| From 31 to 50 years old | 9 | 0 | 0 | 0 | 9 |
| Over 50 years old | 0 | 0 | 0 | 0 | 0 |
| **OPERATORS** | **18** | **19** | **0** | **0** | **37** |
| Up to 30 years old | 12 | 8 | 0 | 0 | 20 |
| From 31 to 50 years old | 5 | 11 | 0 | 0 | 16 |
| Over 50 years old | 1 | 0 | 0 | 0 | 1 |
| **TECHNICIANS** | **6** | **5** | **0** | **0** | **11** |
| Up to 30 years old | 4 | 4 | 0 | 0 | 8 |
| From 31 to 50 years old | 2 | 1 | 0 | 0 | 3 |
| Over 50 years old | 6 | 5 | 0 | 0 | 11 |
| **Overall total** | **905** | **336** | **2** | **2** | **1,245** |

## Quality employment

*Workforce by workday type*

**Workforce at the end of 2025 by workday type, age, gender, professional category and country**

| Type of working day/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **FULL TIME** | **990** | **309** | **3** | **1** | **1,303** |
| **CLERICAL WORKERS** | **15** | **33** | **0** | **0** | **48** |
| Up to 30 years old | | 2 | 0 | 0 | 2 |
| From 31 to 50 years old | 6 | 16 | 0 | 0 | 22 |
| Over 50 years old | 9 | 15 | 0 | 0 | 24 |
| **SUPPORT AND IMPROVEMENT** | **49** | **37** | **0** | **0** | **86** |
| Up to 30 years old | 1 | 3 | 0 | 0 | 4 |
| From 31 to 50 years old | 28 | 17 | 0 | 0 | 45 |
| Over 50 years old | 20 | 17 | 0 | 0 | 37 |
| **GENERAL MANAGEMENT** | **56** | **21** | **0** | **0** | **77** |
| From 31 to 50 years old | 20 | 11 | 0 | 0 | 31 |
| Over 50 years old | 36 | 10 | 0 | 0 | 46 |
| **MANAGERS** | **71** | **34** | **0** | **0** | **105** |
| Up to 30 years old | 1 | 3 | 0 | 0 | 4 |
| From 31 to 50 years old | 45 | 26 | 0 | 0 | 71 |
| Over 50 years old | 25 | 5 | 0 | 0 | 30 |
| **MAINTENANCE** | **138** | **1** | **0** | **0** | **139** |
| Up to 30 years old | 8 | 1 | 0 | 0 | 9 |
| From 31 to 50 years old | 98 | 0 | 0 | 0 | 98 |
| Over 50 years old | 32 | 0 | 0 | 0 | 32 |

| Type of working day/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **OPERATORS** | **365** | **45** | **0** | **0** | **410** |
| Up to 30 years old | 29 | 15 | 0 | 0 | 44 |
| From 31 to 50 years old | 278 | 29 | 0 | 0 | 307 |
| Over 50 years old | 58 | 1 | 0 | 0 | 59 |
| **TEAM MANAGER** | **72** | **6** | **0** | **0** | **78** |
| Up to 30 years old | 0 | 0 | 0 | 0 | |
| From 31 to 50 years old | 46 | 5 | 0 | 0 | 51 |
| Over 50 years old | 26 | 1 | 0 | 0 | 27 |
| **TECHNICIANS** | **224** | **132** | **3** | **1** | **360** |
| Up to 30 years old | 31 | 17 | 2 | | 50 |
| From 31 to 50 years old | 139 | 102 | 1 | 1 | 243 |
| Over 50 years old | 54 | 13 | 0 | 0 | 67 |

**Workforce at the end of 2025 by workday type, age, gender, professional category and country**

| Type of working day/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **PART TIME** | **15** | **24** | **0** | **0** | **39** |
| **CLERICAL WORKERS** | **1** | **2** | **0** | **0** | **3** |
| From 31 to 50 years old | 0 | 2 | 0 | 0 | 2 |
| Over 50 years old | 1 | 0 | 0 | 0 | 1 |
| **SUPPORT AND IMPROVEMENT** | **2** | **7** | **0** | **0** | **9** |
| From 31 to 50 years old | 1 | 6 | 0 | 0 | 7 |
| Over 50 years old | 1 | 1 | 0 | 0 | 2 |
| **MANAGERS** | **2** | **1** | **0** | **0** | **3** |
| From 31 to 50 years old | 1 | 1 | 0 | 0 | 2 |
| Over 50 years old | 1 | | 0 | 0 | 1 |
| **OPERATORS** | **6** | **2** | **0** | **0** | **8** |
| Up to 30 years old | 1 | | 0 | 0 | 1 |
| From 31 to 50 years old | 3 | 2 | 0 | 0 | 5 |
| Over 50 years old | 2 | | 0 | 0 | 2 |
| **TEAM MANAGER** | **1** | | **0** | **0** | **1** |
| From 31 to 50 years old | 1 | | 0 | 0 | 1 |
| **TECHNICIANS** | **3** | **12** | **0** | **0** | **15** |
| Up to 30 years old | 0 | 1 | 0 | 0 | 1 |
| From 31 to 50 years old | 3 | 10 | 0 | 0 | 13 |
| Over 50 years old | 0 | 1 | 0 | 0 | 1 |
| **Overall total** | **1,005** | **333** | **3** | **1** | **1,342** |

**Workforce at the end of 2024 by workday type, age, gender, professional category and country**

| Type of working day/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **FULL TIME** | **889** | **318** | **2** | **2** | **1,211** |
| **CLERICAL WORKERS** | **15** | **35** | **0** | **0** | **50** |
| Up to 30 years old | | 3 | 0 | 0 | 3 |
| From 31 to 50 years old | 9 | 19 | 0 | 0 | 28 |
| Over 50 years old | 6 | 13 | 0 | 0 | 19 |
| **SUPPORT AND IMPROVEMENT** | **46** | **30** | **0** | **0** | **76** |
| Up to 30 years old | 2 | 1 | 0 | 0 | 3 |
| From 31 to 50 years old | 26 | 21 | 0 | 0 | 47 |
| Over 50 years old | 18 | 8 | 0 | 0 | 26 |
| **GENERAL MANAGEMENT** | **57** | **19** | **0** | **0** | **76** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 26 | 13 | 0 | 0 | 39 |
| Over 50 years old | 31 | 6 | 0 | 0 | 37 |
| **MANAGERS** | **73** | **33** | **0** | **0** | **106** |
| Up to 30 years old | 0 | 4 | 0 | 0 | 4 |
| From 31 to 50 years old | 48 | 23 | 0 | 0 | 71 |
| Over 50 years old | 25 | 6 | 0 | 0 | 31 |
| **MAINTENANCE** | **135** | **1** | **0** | **0** | **136** |
| Up to 30 years old | 5 | 1 | 0 | 0 | 6 |
| From 31 to 50 years old | 104 | 0 | 0 | 0 | 104 |
| Over 50 years old | 26 | 0 | 0 | 0 | 26 |

**Workforce at the end of 2024 by workday type, age, gender, professional category and country**

| Type of working day/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **TEAM MANAGER** | **55** | **2** | **0** | **0** | **57** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 43 | 2 | 0 | 0 | 45 |
| Over 50 years old | 12 | 0 | 0 | 0 | 12 |
| **TECHNICIANS** | **211** | **142** | **2** | **2** | **357** |
| Up to 30 years old | 30 | 23 | 1 | 1 | 55 |
| From 31 to 50 years old | 129 | 109 | 1 | 1 | 240 |
| Over 50 years old | 52 | 10 | 0 | 0 | 62 |
| | | | | | |

**Workforce at the end of 2024 by workday type, age, gender, professional category and country**

| Type of working day/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **PART TIME** | **16** | **18** | **0** | **0** | **34** |
| **CLERICAL WORKERS** | **1** | **0** | **0** | **0** | **1** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 0 | 0 | 0 | 0 | 0 |
| Over 50 years old | 1 | 0 | 0 | 0 | 1 |
| **SUPPORT AND IMPROVEMENT** | **1** | **5** | **0** | **0** | **6** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 0 | 0 | 0 | 0 | 0 |
| Over 50 years old | 1 | 0 | 0 | 0 | 1 |

**Workforce at the end of 2024 by workday type, age, gender, professional category and country**

| Type of working day/Age | SPAIN | | PORTUGAL | | TOTAL |
|---|---|---|---|---|---|
| | Men | Women | Men | Women | |
| **MANAGERS** | **2** | **1** | **0** | **0** | **3** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 1 | 1 | 0 | 0 | 2 |
| Over 50 years old | 1 | 0 | 0 | 0 | 1 |
| **MAINTENANCE** | **1** | **0** | **0** | **0** | **1** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 0 | 0 | 0 | 0 | 0 |
| Over 50 years old | 1 | 0 | 0 | 0 | 1 |
| **OPERATORS** | **6** | **4** | **0** | **0** | **10** |
| Up to 30 years old | 1 | 0 | 0 | 0 | 1 |
| From 31 to 50 years old | 5 | 3 | 0 | 0 | 8 |
| Over 50 years old | 0 | 1 | 0 | 0 | 1 |
| **TEAM MANAGER** | **1** | **0** | **0** | **0** | **1** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 1 | 0 | 0 | 0 | 1 |
| Over 50 years old | 0 | 0 | 0 | 0 | 0 |
| **TECHNICIANS** | **4** | **8** | **0** | **0** | **12** |
| Up to 30 years old | 0 | 0 | 0 | 0 | 0 |
| From 31 to 50 years old | 4 | 8 | 0 | 0 | 12 |
| Over 50 years old | 0 | 0 | 0 | 0 | 0 |
| **Overall total** | **905** | **336** | **2** | **2** | **1,245** |

*Turnover rate*

| Turnover rate | 2025-Spain | | | 2025-Portugal | | |
|---|---|---|---|---|---|---|
| | Men | Women | Total | Men | Women | Total |
| Up to 30 years old | 2.9 | 2 | 2.6 | 0 | 1.3 | 0.5 |
| From 31 to 50 years old | 0.3 | 0.5 | 0.3 | 0 | 0 | 0 |
| Over 50 years old | 0.1 | 0 | 0.1 | 0 | 0 | 0 |
| **Overall total** | **0.4** | **0.6** | **0.5** | **0.0** | **0.6** | **0.3** |

| Turnover rate | 2024-Spain | | | 2024-Portugal | | |
|---|---|---|---|---|---|---|
| | Men | Women | Total | Men | Women | Total |
| Up to 30 years old | 2.4 | 2.2 | 2.3 | 1 | 1.3 | 1.1 |
| From 31 to 50 years old | 0.3 | 0.7 | 0.4 | 0.6 | 0 | 0.4 |
| Over 50 years old | 0.1 | 0.2 | 0.1 | 0 | 0 | 0 |
| **Overall total** | **0.4** | **0.8** | **0.5** | **0.8** | **0.6** | **0.7** |

Turnover rate = (No. of total departures) / average workforce. The total number of departures includes resignations, dismissals, retirements, and if any, deaths in service.

Redundancies

| 2025 Redundancies | Spain | | | Portugal | | |
|---|---|---|---|---|---|---|
| | Men | Women | Total | Men | Women | Total |
| **Clerical workers** | **1** | **2** | **3** | **0** | **0** | **0** |
| From 31 to 50 years old | 1 | 2 | 3 | 0 | 0 | 0 |
| **General management** | **2** | **0** | **2** | **0** | **0** | **0** |
| From 31 to 50 years old | 1 | 0 | 1 | 0 | 0 | 0 |
| Over 50 years old | 1 | 0 | 1 | 0 | 0 | 0 |
| **Managers** | **1** | **1** | **2** | **0** | **0** | **0** |
| Up to 30 years old | 0 | 1 | 1 | 0 | 0 | 0 |
| From 31 to 50 years old | 1 | 0 | 1 | 0 | 0 | 0 |
| **Maintenance** | **1** | **0** | **1** | **0** | **0** | **0** |
| From 31 to 50 years old | 1 | 0 | 1 | 0 | 0 | 0 |
| **Operators** | **3** | **2** | **5** | **0** | **0** | **0** |
| Up to 30 years old | 1 | 0 | 1 | 0 | 0 | 0 |
| From 31 to 50 years old | 1 | 2 | 3 | 0 | 0 | 0 |
| Over 50 years old | 1 | 0 | 1 | 0 | 0 | 0 |
| **Technicians** | **7** | **1** | **8** | **0** | **0** | **0** |
| From 31 to 50 years old | 1 | 0 | 1 | 0 | 0 | 0 |
| Up to 30 years old | 4 | 1 | 5 | 0 | 0 | 0 |
| Over 50 years old | 2 | 0 | 2 | 0 | 0 | 0 |
| **Total** | **15** | **6** | **21** | **0** | **0** | **0** |

| 2024 Redundancies | Spain | | | Portugal | | |
|---|---|---|---|---|---|---|
| | Men | Women | Total | Men | Women | Total |
| **Clerical workers** | **0** | **3** | **3** | **0** | **0** | **0** |
| From 31 to 50 years old | 0 | 3 | 3 | 0 | 0 | 0 |
| **General management** | **3** | **1** | **4** | **0** | **0** | **0** |
| From 31 to 50 years old | 3 | 1 | 4 | 0 | 0 | 0 |
| **Managers** | **3** | **0** | **3** | **0** | **0** | **0** |
| From 31 to 50 years old | 3 | 0 | 3 | 0 | 0 | 0 |
| **Maintenance** | **1** | **0** | **1** | **0** | **0** | **0** |
| From 31 to 50 years old | 1 | 0 | 1 | 0 | 0 | 0 |
| **Operators** | **3** | **0** | **3** | **0** | **0** | **0** |
| From 31 to 50 years old | 2 | 0 | 2 | 0 | 0 | 0 |
| Over 50 years old | 1 | 0 | 1 | 0 | 0 | 0 |
| **Team managers** | **1** | **0** | **1** | **0** | **0** | **0** |
| Over 50 years old | 1 | 0 | 1 | 0 | 0 | 0 |
| **Technicians** | **10** | **6** | **16** | **1** | **0** | **1** |
| From 31 to 50 years old | 1 | 1 | 2 | 0 | 0 | 0 |
| Up to 30 years old | 7 | 5 | 12 | 1 | 0 | 1 |
| Over 50 years old | 2 | 0 | 2 | 0 | 0 | 0 |
| **Total** | **21** | **10** | **31** | **1** | **0** | **1** |

## Training and professional development

*Training*

**Average hours of training in 2025**

| Professional group | Men | Women | Total |
|---|---|---|---|
| Clerical workers | 9.68 | 10.23 | 10.05 |
| Support and improvement | 28.36 | 21.46 | 24.89 |
| General management | 22.85 | 20.01 | 22.09 |
| Managers | 24.14 | 22.82 | 23.71 |
| Maintenance | 19.94 | 13.49 | 19.89 |
| Operators | 21.74 | 26.32 | 22.37 |
| Team managers | 25.24 | 26.37 | 25.34 |
| Technicians | 19.39 | 25.16 | 21.63 |
| **Total** | **21.53** | **22.82** | **21.87** |

**Average hours of training in 2024**

| Professional group | Men | Women | Total |
|---|---|---|---|
| Clerical workers | 5.09 | 6.53 | 6.08 |
| Support and improvement | 23.73 | 25.82 | 24.78 |
| General management | 11.76 | 14.64 | 12.5 |
| Managers | 17.4 | 17.73 | 17.5 |
| Maintenance | 16.23 | 96.98 | 16.55 |
| Operators | 23.3 | 30.57 | 24.35 |
| Team managers | 21.03 | 8.35 | 20.34 |
| Technicians | 14.67 | 16.36 | 15.36 |
| **Total** | **18.51** | **18.80** | **18.59** |

**Total training hours in 2025**

| Professional group | Men | Women | Total |
|---|---|---|---|
| Clerical workers | 154.5 | 340.5 | 495.0 |
| Support and improvement | 1,359.5 | 1,043.5 | 2,403.0 |
| General management | 1,293.5 | 411.0 | 1,704.5 |
| Managers | 1,684.0 | 775.5 | 2,459.5 |
| Maintenance | 2,733.5 | 15.0 | 2,748.5 |
| Operators | 7,272.0 | 1,395.0 | 8,667.0 |
| Team managers | 1,717.0 | 168.5 | 1,885.5 |
| Technicians | 4,479.5 | 3,706.0 | 8,185.5 |
| **Total** | **20,693.5** | **7,855.0** | **28,548.5** |

**Total training hours in 2024**

| Professional group | Men | Women | Total |
|---|---|---|---|
| Clerical workers | 1,240.5 | 546.5 | 1,787.0 |
| Support and improvement | 3,237.5 | 2,462.0 | 5,699.5 |
| General management | 1,073.0 | 1,173.5 | 2,246.5 |
| Managers | 82.0 | 227.0 | 309.0 |
| Maintenance | 2,167.5 | 52.0 | 2,219.5 |
| Operators | 6,948.0 | 1,526.0 | 8,474.0 |
| Team managers | 674.0 | 288.0 | 962.0 |
| Technicians | 1,411.5 | 32.0 | 1,443.5 |
| **Total** | **16,834.0** | **6,307.0** | **23,141.0** |

*Performance evaluations*

**Performance evaluations conducted in 2025**

| Professional group | Men | Women | Total |
|---|---|---|---|
| Clerical workers | 1 | 3 | 4 |
| Support and improvement Quality Control | 7 | 2 | 9 |
| General management | 53 | 21 | 74 |
| Managers | 72 | 35 | 107 |
| Operators | 3 | | 3 |
| Team Leaders | 56 | 5 | 61 |
| Technicians | 220 | 137 | 357 |
| **Total** | **412** | **203** | **615** |

**Performance evaluations conducted in 2024**

| Professional group | Men | Women | Total |
|---|---|---|---|
| Clerical workers | 1 | 5 | 6 |
| Support and improvement Quality Control | 5 | 2 | 7 |
| General management | 56 | 18 | 74 |
| Managers | 71 | 33 | 104 |
| Operators | 2 | | 2 |
| Team Leaders | 53 | 2 | 55 |
| Technicians | 205 | 137 | 342 |
| **Total** | **393** | **197** | **590** |

Remunerations

## Remunerations [1]

**Average remuneration 2025 (€)**

| Age: | Men | Women | Total |
|---|---|---|---|
| Up to 30 years old | 39,973 | 40,586 | 40,211 |
| From 31 to 50 years old | 65,559 | 65,799 | 65,621 |
| Over 50 years old | 84,286 | 81,006 | 83,641 |
| **Total average remuneration** | **69,908** | **66,584** | **69,082** |

**Average remuneration 2024 (€)**

| Age: | Men | Women | Total |
|---|---|---|---|
| Up to 30 years old | 42,545 | 40,531 | 41,673 |
| From 31 to 50 years old | 68,374 | 64,279 | 67,235 |
| Over 50 years old | 87,277 | 83,629 | 86,554 |
| **Total average remuneration** | **72,189** | **64,997** | **70,251** |

(1) In order to preserve confidentiality in the breakdowns of average remuneration, the average remuneration of employees in Portugal is not included due to its low representation (4 in 2024 and 2025). Furthermore, the Managing Director is not included in the calculation because he is not a salaried employee as he has a commercial contract instead of an employment contract. Senior Management includes the Management Committee, the Internal Auditing Director and the Ethics and Compliance Director.

### Average remuneration 2025 by professional group (€)

| Professional group | Men | Women | Total |
|---|---|---|---|
| Senior Management (1) | 622,094 | 318,146 | 520,778 |
| General management | 195,969 | 185,612 | 193,186 |
| Managers | 107,523 | 104,494 | 106,532 |
| Technicians | 61,733 | 55,344 | 59,286 |
| Team managers | 66,351 | 59,743 | 65,800 |
| Operators | 51,773 | 41,740 | 50,614 |
| Maintenance | 51,975 | 34,396 | 51,729 |
| Support and improvement | 56,275 | 48,543 | 52,973 |
| Clerical workers | 49,944 | 48,619 | 48,993 |
| **Total average remuneration** | **69,908** | **66,584** | **69,082** |

### Average remuneration 2024 by professional group (€)

| Professional group | Men | Women | Total |
|---|---|---|---|
| Senior Management (1) | 520,008 | 309,292 | 449,769 |
| General management | 194,265 | 200,529 | 195,854 |
| Managers | 103,983 | 102,211 | 103,425 |
| Technicians | 59,070 | 52,691 | 56,449 |
| Team managers | 72,049 | 71,572 | 72,033 |
| Operators | 55,883 | 38,897 | 53,075 |
| Maintenance | 56,077 | 28,384 | 55,882 |
| Support and improvement | 56,625 | 55,754 | 56,262 |
| Clerical workers | 49,523 | 49,014 | 49,170 |
| **Total average remuneration** | **72,189** | **64,997** | **70,251** |

1. Senior Management includes the Management Committee, the Internal Auditing Director and the Ethics and Compliance Director.

## Health and safety

*Accidents*

| Accidents 2025 | In-house staff | | External Staff | | TOTAL |
|---|---|---|---|---|---|
| Type | Men | Women | Men | Women | |
| Accidents with leave | 7 | 2 | 12 | 0 | 21 |
| Accidents without leave | 10 | 1 | 12 | 2 | 25 |
| **Total** | **17** | **3** | **24** | **2** | **46** |

| Accidents 2024 | In-house staff | | External Staff | | TOTAL |
|---|---|---|---|---|---|
| Type | Men | Women | Men | Women | |
| Accidents with leave | 5 | 2 | 14 | 0 | 21 |
| Accidents without leave | 14 | 2 | 16 | 1 | 33 |
| **Total** | **19** | **4** | **30** | **1** | **54** |

*Accident indexes*

| Indexes 2025 | In-house staff | | | External Staff | | | Total | | |
|---|---|---|---|---|---|---|---|---|---|
| Type | Men | Women | Total | Men | Women | Total | Men | Women | Total |
| **Frequency Index** | | | | | | | | | |
| Pulp | 2.84 | 0.00 | 2.32 | 5.27 | 0.00 | 4.60 | 3.85 | 0.00 | 3.24 |
| Energy | 17.30 | 0.00 | 12.70 | 5.78 | 0.00 | 5.09 | 10.39 | 0.00 | 8.47 |
| Forestry | 0.00 | 9.00 | 3.91 | 4.90 | 0.00 | 4.64 | 3.96 | 6.85 | 4.43 |
| **TOTAL** | **4.21** | **3.31** | **3.97** | **5.15** | **0.00** | **4.69** | **4.76** | **2.40** | **4.35** |
| **Severity Index** | | | | | | | | | |
| Pulp | 0.228 | 0.000 | 0.187 | 0.109 | 0.000 | 0.095 | 0.178 | 0.000 | 0.150 |
| Energy | 1.146 | 0.000 | 0.841 | 0.740 | 0.000 | 0.651 | 0.902 | 0.000 | 0.735 |
| Forestry | 0.069 | 0.000 | 0.039 | 0.434 | 0.000 | 0.411 | 0.365 | 0.000 | 0.306 |
| **TOTAL** | **0.317** | **0.000** | **0.232** | **0.374** | **0.000** | **0.341** | **0.350** | **0.000** | **0.290** |

| Indexes 2024 | In-house staff | | | External Staff | | | Total | | |
|---|---|---|---|---|---|---|---|---|---|
| Type | Men | Women | Total | Men | Women | Total | Men | Women | Total |
| **Frequency Index** | | | | | | | | | |
| Pulp | 3.63 | 0.00 | 2.98 | 2.77 | 0.00 | 2.42 | 3.29 | 0.00 | 2.76 |
| Energy | 4.36 | 12.03 | 6.40 | 2.72 | 0.00 | 2.39 | 3.35 | 7.50 | 4.10 |
| Forestry | 3.57 | 0.00 | 2.02 | 7.67 | 0.00 | 7.25 | 7.00 | 0.00 | 5.97 |
| **TOTAL** | **3.55** | **1.64** | **3.05** | **5.54** | **0.00** | **5.07** | **4.74** | **1.18** | **4.15** |
| **Severity Index** | | | | | | | | | |
| Pulp | 0.096 | 0.000 | 0.079 | 0.014 | 0.000 | 0.012 | 0.064 | 0.000 | 0.053 |
| Energy | 0.052 | 0.120 | 0.070 | 0.005 | 0.000 | 0.005 | 0.023 | 0.075 | 0.033 |
| Forestry | 0.000 | 0.284 | 0.123 | 0.537 | 0.000 | 0.508 | 0.449 | 0.206 | 0.413 |
| TOTAL | 0.112 | 0.000 | 0.082 | 0.310 | 0.000 | 0.283 | 0.230 | 0.000 | 0.192 |

## Responsible Taxation

*Company name*

**Name of resident entities**

| COMPANY | Tax ID |
|---|---|
| ANCEN SOLAR III, S.L.U. | B88577143 |
| ANCEN SOLAR IV, S.L.U. | B88577192 |
| ANCEN SOLAR V, S.L.U. | B88577168 |
| BIOCH4 DEVELOPMENTS SL | B72651755 |
| BIOENERGIA SANTAMARIA SA | A14595862 |
| BIOFERT. Y BIO. ALMACELLES, S. | B55421507 |
| BIOFERT. Y BIO. BARBASTRO, S.L | B55427645 |
| BIOFERT. Y BIO. CAMARLES, S.L. | B55427652 |
| BIOFERT. Y BIO. CARMONA, S.L.U | B55427678 |
| BIOFERT. Y BIO. CASTELLAR, S.L | B55427686 |

**Name of resident entities**

| COMPANY | Tax ID |
|---|---|
| BIOFERT. Y BIO. LUCILLOS, S.L. | B55433254 |
| BIOFERT. Y BIO. PELEAS DE ABAJ | B55433270 |
| BIOFERT. Y BIO. SANTOVENIA DEL | B55433262 |
| BIOFERT. Y BIO. SERTOGAL XUNQU | B19351873 |
| BIOFERT. Y BIO. XUNQUEIRAS, S. | B55434823 |
| BIOFERT. Y BIO. ZUERA, S.L.U. | B55434831 |
| BIOFIBRAS DE GALICIA SL | B44820769 |
| BIOGAS ALMACELLES, S.L.U. | B44818557 |
| BIOGAS CARMONA, S.L.U. | B44818300 |
| BIOGAS SAN ESTEBAN, S.L.U. | B44818797 |
| BIOMETAGAS LA GALERA SL | B43990449 |
| CELULOSA ENERGIA SA | A21203237 |
| CELULOSAS DE ASTURIAS SA | A78380748 |
| ENCE BIOGAS SL | B10871325 |
| ENCE BIOMASA CORDOBA SL | B88493242 |
| ENCE CO2 SLU | B88168018 |
| ENCE ENERGIA CASTILLA Y LEON | B85749828 |
| ENCE ENERGIA CASTILLA Y LEON D | B85919900 |
| ENCE ENERGIA CELTA SL | B86538444 |
| ENCE ENERGIA ESTE S.L.U. | B86856200 |
| ENCE ENERGIA EXTREMADURA SLU | B85919850 |
| ENCE ENERGIA HUELVA DOS SLU | B85981769 |
| ENCE ENERGIA HUELVA SLU | B85749869 |

**Name of resident entities**

| COMPANY | Tax ID |
|---|---|
| ENCE ENERGIA PAMI S.L.U. | B86856218 |
| ENCE ENERGIA PUERTOLLANO 2, S. | B01629492 |
| ENCE ENERGIA PUERTOLLANO S.L.U | B86856192 |
| ENCE ENERGIA Y CELULOSA SA | A28212264 |
| ENCE ENERGÍA EXTREMADURA DOS S | B85981710 |
| ENCE INVESTIGACIÓN Y DESARROLLO | A36337434 |
| ENCE RENOVABLES, SL | B44816429 |
| ENCE TERRA SA | A33022492 |
| ENERGIA DE LA LOMA SA | A23410152 |
| ENERGIAS DE LA MANCHA ENEMAN S | A13228648 |
| GRANADA 133 SOLAR SL | B88577150 |
| IBERSILVA S A (SUCURSAL URUGUA | 214661260014 |
| IBERSILVA SA | A21294780 |
| INFRAESTRUCTURA BIOMETAGAS SL | B42776252 |
| LAS PLEYADES ARGENTINA S A | # |
| LAS PLEYADES URUGUAY SA | 211448920016 |
| LIPTOFLOR , S.A. | 515393460 |
| MAGNON BIOMASA, S.L.U | B88216478 |
| MAGNON GREEN ENERGY, S.L.U. | B85739209 |
| MAGNON SERVICIOS ENERGETICOS, SL | B88231782 |
| SEVILLA 90 SOLAR SLU | B88577176 |
| SILVASUR AGROFORESTAL SAU | A10008084 |
| SUSTAINABILITY AND CIRCULAR ECONOMY | B85749877 |

## Tax contribution

| Tax Jurisdictions – 2024 | Argentina | Spain | Portugal | Uruguay | Total |
|---|---|---|---|---|---|
| Number of resident entities | 1 | 52 | 1 | 2 | 56 |
| Number of Employees (31/12/2024) | - | 1,241 | 4 | - | 1,245 |
| Revenue from sales to third parties (thousands of €) | - | 689,898 | 540 | - | 870,438 |
| Revenue from intra-group transactions between and with other tax jurisdictions (thousands of €) | - | - | 4,676 | - | 4,676 |
| Tangible assets other than cash and cash equivalents (thousands of €) | - | 1,129,941 | 1,464 | 136 | 1,131,541 |
| **Corporate income tax settlement** | | | | | |
| Accounting result before tax (thousands of €) | - | 32,677 | -328 | 0 | 32,350 |
| Net amount (Tax on profit paid) (thousands of €) | - | -3,108 | 30 | 0 | -3,078 |
| **Profit tax (expense / (income))** | | | | | |
| Current tax (thousands of €) | - | 6,808 | 20 | 0 | 6,827 |
| Deferred tax (thousands of €) | - | 5,403 | 0 | 0 | 5,403 |
| Effective rate (%) | - | 18% | 21% | 25% | - |
| Nominal rate (%) | - | 25% | 21% | 25% | - |

## Grants

| Project title 2024 | Company | Site | Amount of aid (€) | Agency |
|---|---|---|---|---|
| IDI-20131159 | Ence | Pontevedra | 99,120 | CDTI |
| Phoseco Project Revenue | Bioenergy Santamaria | Lucena | 31,269 | Regional Government of Andalusia |
| OXILIN IDE/2020/000011 | Ceasa | Navia | 85,087 | IDEPA |
| Mahou 2026 Decarbonisation Project | Ence Energía Extremadura | Extremadura | 4,361,966 | MITECO |
| **Results** | | | **4,577,440** | |

This includes additions of grants received during the financial year, of both a capital and operating nature.

## Direct (1) and Indirect Tax Contribution by Autonomous Community

| Thousands of Euros – 2024 | Spain | | | | | | | Portugal | Total |
|---|---|---|---|---|---|---|---|---|---|
| | Andalusia | Asturias | Castile La Mancha | Catalonia | Extremadura | Galicia | Madrid and other | | |
| Property Tax | 495 | 36 | 72 | 19 | 94 | 0 | 495 | 0 | 716 |
| Trade Tax | 646 | 385 | 71 | 15 | 319 | 16 | 646 | 0 | 1,452 |
| Fees | 117 | 237 | 268 | 4 | 1,665 | 44 | 117 | 0 | 2,336 |
| PTT and Stamp duty | 0 | 171 | 0 | 4 | 0 | 1 | 0 | 0 | 177 |
| Environmental levy | 140 | 196 | 649 | 39 | 1,145 | 0 | 140 | 0 | 2,169 |
| Corporate Income Tax | -504 | 0 | -92 | 0 | 0 | -2,512 | -504 | 20 | -3,088 |
| Tax on electricity generation | 7,425 | 1,889 | 1,701 | 982 | 77 | 0 | 7,425 | 0 | 12,074 |
| IH purchase of fuel | 0 | 134 | 0 | 0 | 339 | 0 | 0 | 0 | 474 |
| Special taxes on energy purchasing | 59 | 120 | 18 | 14 | 25 | 0 | 59 | 0 | 236 |
| Social security contribution | 3,007 | 7,828 | 102 | 573 | 6,724 | 2,155 | 3,007 | 0 | 20,390 |
| Withholdings | 2,685 | 7,160 | 118 | 508 | 9,233 | 5,766 | 2,685 | 0 | 25,469 |
| VAT | 18,879 | 30,146 | 4,875 | 906 | 0 | 365 | 18,879 | 0 | 55,171 |
| Special taxes on energy sales | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Social security - worker | 589 | 1,610 | 20 | 112 | 1,387 | 649 | 589 | 0 | 4,368 |
| **Total** | **33,538** | **49,913** | **7,802** | **3,175** | **21,009** | **6,485** | **33,538** | **20** | **121,943** |

(1) Direct contribution means those taxes that the company generates directly through its activity. Indirect taxation refers to taxes where society acts as a tax collector.

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| **Description of the group's business model** | | | |
| A brief description of the group's business model, including its business environment, organisation and structure, the markets in which it operates, its objectives and strategies, and the main factors and trends that may affect its future evolution. | ESRS 2 | 1.1 Business model<br>1.3 Strategic framework<br>1.4.2 Sustainability policies<br>1.4.5 2024-2028 Sustainability Master Plan and annual targets | 3<br>5-7<br>9-10<br>11-17 |
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| **Main risks** | | | |
| Main risks related to issues associated with the group's activities, including, where relevant and proportionate, its commercial relations, products or services that may have negative effects in those areas, and how the group manages those risks, explaining the procedures used to identify and evaluate them pursuant to the national, European, or international reference frameworks for each subject. This should include information on the impacts that have been identified, giving a breakdown of these impacts, in particular on the main risks in the short, medium, and long term. | E1 - IRO1 | **Climate change:** Risks | 38-45 |
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| **General** | | | |
| Current and foreseeable effects of the company's activities on the environment | E1 - IRO1 | **Climate change:** Impacts | 38 |
| | E2 - IRO1 | **Pollution:** 2.3.1.1 Impacts | 57-58 |
| | E3 - IRO1 | **Water and marine resources:** 2.4.1.1 Impacts | 63-64 |
| | E4 - IRO-1 | **Biodiversity:** 2.5.1.1 Impacts | 69-70 |
| | E5 - IRO-1 | **Circular economy:** 2.6.1.1 Impacts | 80 |
| Environmental assessment or certification procedures | Ence has environmental certifications in accordance with the UNE-EN-ISO 14001 and UNE-EN-ISO 50001 standards and the European Eco-Management and Audit Scheme (EMAS), as well as the EU Ecolabel, Nordic Swan and AENOR Zero Waste and SURE environmental certifications. | Environmental certifications | 59-60 |
| Resources dedicated to the prevention of environmental risks | E1 - 3 | **Climate change:** 2.2.4.2 Decarbonisation Plan: emission reduction targets, actions and resources | 47-50 |
| | E2 - 2 | **Pollution:** Actions and resources | 61 |

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| Resources dedicated to the prevention of environmental risks | E3 - 2 | **Water and marine resources** Actions and resources | 67 |
| | E4 - 3 | **Biodiversity:** 2.5.3 Objectives, actions and metrics | 73-78 |
| | E5 - IRO-1 | **Circular economy:** 2.6.1.1 Impacts | 80 |
| Application of the precautionary principle | **E2 - IRO1** | Cross-cutting mitigation measures | **58-60** |
| Provisions and guarantees for environmental risks | The Ence facilities to which Act 26/2007 of 23 October, on Environmental Liability applies are exempt from providing financial guarantees in accordance with section a) and b) of article 28 of the aforementioned Act because they are members of the EMAS and/or the environmental management system UNE-EN ISO 14001 or because the assessment of the damage potentially caused is less than €300,000. Ence has also taken out an environmental liability policy with a general limit of €60 million for all the guarantees and coverages of the policy. Provisions regarding probable or certain liabilities, litigation in progress and outstanding indemnities or obligations of an undetermined amount of an environmental nature, not covered by the insurance policies taken out, are established when the liability or obligation giving rise to the indemnity or payment arises. There are no provisions made for this item at the end of 2024. | | - |
| **Pollution** | | | |
| Measures to prevent, reduce, or remedy carbon emissions that seriously affect the environment, taking into account any form of air pollution specific to an activity, including noise and light pollution. | E1 - 3 | **Climate change:** 2.2.4.2 Decarbonisation Plan: emission reduction targets, actions and resources | 47-50 |
| | E2 - 2 | **Pollution:** Actions and resources | 61-63 |
| | Not applicable | In the case of light pollution, although so far not identified as an environmental factor with significant impact, it is included in environmental impact assessments of new projects. Given the non-significance of this environmental aspect, it has not been necessary to implement specific compensatory measures, nor has it been necessary to establish limits for this aspect in the environmental authorisations of any of the facilities. In 2024, as in previous years, Ence has received no complaints related to light pollution from neighbouring communities or administrations. | - |
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| Actions to combat food waste | Not applicable | This is a non-material aspect for Ence, since the company's activity has no impact on the production, consumption or distribution of food. | - |
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| Consumption of raw materials and measures taken to improve the efficiency of their use | E1-4 | 2.6.4 Metrics | 84-86 |
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| Measures taken to improve energy efficiency | E1-3 | 2.2.4.2 Decarbonisation Plan: emission reduction targets, actions and resources | 47-50 |

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| Use of renewable energies | E1-5 | 2.2.5.1 Energy consumption | 50-52 |
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| **Protection of biodiversity** | | | |
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| Impacts caused by activities or operations in protected areas | E4 - SBM 3 | 2.5.1.1 Impacts | 69-70 |
| INFORMATION ON SOCIAL AND PERSONNEL ISSUES | | | |
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| **Main risks** | | | |
| Main risks related to issues associated with the group's activities, including, where relevant and proportionate, its commercial relations, products or services that may have negative effects in those areas, and how the group manages those risks, explaining the procedures used to identify and evaluate them pursuant to the national, European, or international reference frameworks for each subject. This should include information on the impacts that have been identified, giving a breakdown of these impacts, in particular on the main risks in the short, medium, and long term. | S1 - SBM3 | Risks | 90 |
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| Average annual number of permanent, temporary and part-time contracts by gender, age and professional classification | S1-6 Ence reports the information at the end of the financial year, as the difference between the mean workforce data and year-end data is less than 5%, so both data reflect equivalent and very similar information. | 3.1.5.2 Quality employment Workforce by contract type Workforce by workday type | 95-98<br>160-162<br>163-166 |

| Law 11/2018 INF contents | Standard used (selected ESRS) | Reference | Pages |
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| **Main risks** | | | |
| Main risks related to issues associated with the group's activities, including, where relevant and proportionate, its commercial relations, products or services that may have negative effects in those areas, and how the group manages those risks, explaining the procedures used to identify and evaluate them pursuant to the national, European, or international reference frameworks for each subject. This should include information on the impacts that have been identified, giving a breakdown of these impacts, in particular on the main risks in the short, medium, and long term. | G1 – IRO 1 | Business conduct: Risks | 126 |
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| **Main risks** | | | |
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| Consideration in relations with suppliers and subcontractors of their social and environmental responsibility | G1-2 | 4.4 Supply chain monitoring | 133-138 |
| Supervision and audit systems and results thereof | G1-2 | 4.4 Supply chain monitoring | 133-138 |
| **Consumers** | | | |
| Measures for the health and safety of consumers | Not applicable | The cellulose produced by Ence is certified to ensure its safety for customers and end consumers, with both Material Safety Data Sheets (MSDS) and ISEGA certification confirming its suitability for food contact. The bio-factories are ISO 22001 certified for Food Safety. | - |
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# Appendix V Description of alternative performance measures (APMs)

In accordance with the observations published by the CNMV in its circular dated 17 April 2023, Ence details the Alternative Performance Measures (APMs) included in this Sustainability Report (Non-Financial Information Statement), to enable investors and other stakeholders of the company to understand the meaning of these financial magnitudes and facilitate their comparability and reliability.

The financial performance magnitudes included in this report for the 2025 financial year, including their definition, reconciliation, comparison and other characteristics defined in the APM Guidelines published by ESMA in 2015, are listed below:

### Taxonomy OPEX

The percentage of **eligible OPEX** according to the European taxonomy of sustainable finance is a magnitude included in section ***2.1 Taxonomy*** of the company's Sustainability Report (NFIS) that measures the proportion of its operating expenses related to assets or processes associated with activities that are considered environmentally sustainable, as defined in Article 8(2)(b) of Regulation (EU) 2020/852.

Among the activities carried out by Ence, several activities included in Regulation (EU) 2020/852 and the implementing Delegated Regulations (Delegated Regulation (EU) 2021/2139 of 4 June 2021, Delegated Regulation (EU) 2022/1214 of 9 March 2022, Delegated Regulation (EU) 2023/2485 of 27 June 2023 and Delegated Regulation (EU) 2023/2486 of 27 June 2023) are considered eligible. Details of eligible activities may be found in section ***2.1.1 Eligibility and alignment analysis*** of the company's Sustainability Report.

This magnitude is calculated by dividing the part related to eligible activities according to this taxonomy by the total costs related to research and development (R&D expenditure items), maintenance (repairs and maintenance item) and leasing (leasing and rent items). This calculation follows the methodology described in the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 (Appendix I, section 1.1.3). -Key performance indicator relating to OpEx operating expenses). The details of the calculation may be found in ***Appendix I Construction of taxonomy KPIs.***

*The percentage of OPEX aligned with the European taxonomy of sustainable finance is a magnitude included in section **2.1 Taxonomy** of the company's Sustainability Report (NFIS) that measures the proportion of its operating expenditure related to assets or processes associated with activities that meet the criteria set out in Article 3 of Regulation (EU) 2020/852 (substantial contribution to the EU's environmental objectives, technical selection criteria, criteria to ensure that they do not cause significant harm to any of the environmental objectives and criteria to ensure that it is carried out in compliance with the minimum safeguards set out in Art. 18 of the same Regulation).*

*This magnitude is calculated by dividing the part related to aligned activities (as detailed in Appendix I of the NFIS, Appendix I Construction of taxonomy KPIs) by the total costs related to research and development (R&D expenditure items), maintenance (repairs and maintenance item) and leasing (leasing and rent items). This calculation follows the methodology described in the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 (Appendix I, section 1.1.3). -Key performance indicator relating to OpEx operating expenses).*

These magnitudes are considered relevant since, under Regulation (EU) 2020/852, any company obliged to publish non-financial information under the provisions of Directive 2013/34/EU, as is the case of Ence, must include information on how and to what extent its activities are associated with economic activities that are considered environmentally sustainable in its Sustainability Report (NFIS). In this context, the reporting of this magnitude is included in the disclosure requirements for non-financial firms set out in Article 10 (entry into force and application) of Delegated Regulation (EU) 2021/2178. For the disclosure of these magnitudes, the "templates for key performance indicators for non-financial corporations" included in Delegated Regulation (EU) 2023/2486 of the Commission of 27 June 2023, amending Delegated Regulation (EU) 2021/2178 of the Commission as regards the disclosure of specific public information on these economic activities, have been used.

A reconciliation to the financial statements for the 2025 financial year and a comparison with the previous financial year is presented below:

| | Unit | Financial Statement Source (*) | 2025 | 2024 |
|---|---|---|---|---|
| **OPERATING COSTS-** | | | | |
| R&D expenditure | M € | Breakdown in Autonomous Regions | 0 | 0 |
| Leases and royalties | M € | Breakdown in Autonomous Regions | 1 | 1 |
| Repairs and maintenance | M € | Breakdown in Autonomous Regions | 36 | 35 |
| | | | **38** | **35** |
| **ELIGIBLE OPERATING COSTS-** | | | | |
| R&D expenditure | M € | | - | 0 |
| Leases and royalties | M € | | 1 | 0 |
| Repairs and maintenance | M € | | 25 | 23 |
| | | | **25** | **24** |
| **% OF ELIGIBILITY** | % | | **67%** | **67%** |
| **ALIGNED OPERATING COSTS** | | | | |
| R&D expenditure | M € | | - | 0 |
| Leases and royalties | M € | | 0 | 0 |
| Repairs and maintenance | M € | | 23 | 23 |
| | | | **23** | **24** |
| **% OF ALIGNMENT** | % | | **61%** | **66%** |

(*) "Breakdown by Autonomous Communities" will refer to the fact that this magnitude appears broken down in the notes to the consolidated annual accounts of ENCE for the reference financial year

### Taxonomy CAPEX

The percentage of **eligible CAPEX** according to the European taxonomy of sustainable finance is a magnitude included in section ***2.1 Taxonomy*** of the company's Sustainability Report that measures the proportion of additions to tangible and intangible assets related to assets or processes associated with activities that are considered environmentally sustainable, as defined in Article 8(2)(b) of Regulation (EU) 2020/852 (see eligible activities detailed in the indicator above).

This magnitude is calculated by dividing the portion related to eligible activities according to this taxonomy by the total additions of assets for the financial year. This calculation follows the methodology described in the Delegated Regulation (EU) 2021/2178 of the Commission of 6 July 2021 (Appendix I, section 1.1.2). Key performance indicator relating to capital expenditure (CapEx). The details of the calculation may be found in Appendix I Construction of taxonomy KPIs.

The percentage of CAPEX aligned with the European taxonomy of sustainable finance is a magnitude included in section 2.1. Taxonomy of the company's Sustainability Report (NFIS) that measures the proportion of additions to tangible and intangible assets related to assets or processes associated with activities that are considered to be aligned with the taxonomy, i.e. that meet the criteria set out in Article 3 of Regulation (EU) 2020/852 (substantial contribution to EU environmental objectives, technical selection

criteria, criteria to ensure that they do not cause significant harm to any of the environmental objectives and criteria to ensure that it is carried out in accordance with the minimum safeguards set out in Art. 18 of the same Regulation). From 2023, the substantial contribution is no longer limited to climate change mitigation and/or adaptation targets, but extends to all six European environmental targets.

This magnitude is calculated by dividing the part related to activities aligned according to this taxonomy (as detailed in Appendix I of the report – ***Appendix I Construction of taxonomy KPIs***) by the total number of asset additions for the financial year. This calculation follows the methodology described in the Delegated Regulation (EU) 2021/2178 of the Commission of 6 July 2021 (Appendix I, section 1.1.2. Key performance indicator relating to capital expenditure (CapEx).

As in the case of OPEX, these magnitudes are considered relevant since, under Regulation (EU) 2020/852, any company obliged to publish non-financial information under the provisions of Directive 2013/34/EU, as is the case of Ence, must include information on how and to what extent its activities are associated with economic activities that are considered environmentally sustainable in its NFIS. In this context, the reporting of this magnitude is included in the disclosure requirements for non-financial firms set out in Article 10 (entry into force and application) of Delegated Regulation (EU) 2021/2178. For the disclosure of these magnitudes, the "templates for key performance indicators for non-financial corporations" included in Delegated Regulation (EU) 2023/2486 of the Commission of 27 June 2023, amending Delegated Regulation (EU) 2021/2178 of the Commission as regards the disclosure of specific public information on these economic activities, have been used.

A reconciliation to the financial statements for the 2025 financial year and a comparison with the previous financial year is presented below:

| | Unit | Financial Statement Source (*) | 2025 | 2024 |
|---|---|---|---|---|
| **INVESTMENTS IN PRODUCTIVE ASSETS** | | | | |
| Intangible fixed assets, Property, plant and equipment and biological assets | M € | Breakdown in Autonomous Regions | 119 | 99 |
| Rights of use assets | M € | Breakdown in Autonomous Regions | 15 | 12 |
| | M € | | **135** | **112** |
| **INVESTMENTS IN ELIGIBLE PRODUCTIVE ASSETS-** | | | | |
| Intangible fixed assets, Property, plant and equipment and biological assets and | M € | | | |
| Rights of use assets | M € | | 68 | 75 |
| | | | **68** | **75** |
| **% OF ELIGIBILITY** | % | | **50%** | **67%** |
| **INVESTMENTS IN ALIGNED PRODUCTIVE ASSETS-** | | | | |
| Intangible fixed assets, Property, plant and equipment and biological assets and | M € | | 61 | 45 |
| Rights of use assets | M € | | **61** | **45** |
| **% OF ALIGNMENT** | % | | **45%** | **41%** |

(*) "Breakdown by Autonomous Communities" will refer to the fact that this magnitude appears broken down in the notes to the consolidated annual accounts of ENCE for the reference financial year

## CAPEX (earmarked resources)

The **CAPEX** included in the information on resources earmarked for environmental and social actions and objectives is a magnitude included in sections 2.2, 2.3, 2.4, 2.5 and 2.6 (Environmental Aspects) and 3.1, 3.3 and 3.4 (Social Aspects) of the company's Sustainability Report, which measures the additions to tangible and intangible assets earmarked for the execution of actions and the achievement of objectives defined for each of the environmental and social aspects relevant to the company.

This magnitude corresponds to the portion of total asset additions for the financial year that have been earmarked for implementing the actions and objectives established by the company in the following environmental and social areas defined in the European Sustainability Reporting Standards defined in Appendix I of Delegated Regulation (EU) 2023/2772: climate change (ESRS E1), pollution (ESRS E2), water and marine resources (ESRS E3), biodiversity (ESRS E4), circular economy (ESRS E5), own workforce (ESRS S1), affected communities (ESRS S3) and customers (Entity Specific, adapted from ESRS S4).

This magnitude is considered relevant as, under Delegated Regulation (EU) 2023/2772 of the Commission of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards, companies required to present sustainability information under the provisions of said Directive must include information on actions and resources in relation to material sustainability matters in their sustainability report (ESRS 2, section 4.2, Minimum Disclosure Requirement - MDR-A Actions). According to point 69 of this MDR, where the implementation of an action plan requires significant CapEx, the company must describe the type of financial resources allocated to the action plan and provide the amount of said resources.

Below is the list of data points included in cross-cutting standards and topical standards derived from other EU legislation:

| | Unit | Financial Statement Source (*) | 2025 | 2024 |
|---|---|---|---|---|
| **INVESTMENTS IN PRODUCTIVE ASSETS** | | | | |
| Intangible fixed assets, Property, plant and equipment and biological assets | M € | Breakdown in Autonomous Regions | **119** | **73** |
| **INVESTMENTS IN PRODUCTIVE ASSETS CLASSIFIED AS RESOURCES EARMARKED FOR THEIR ENVIRONMENTAL AND SOCIAL NATURE ACCORDING TO ESRS(**)-** | | | | |
| ESRS E1 - Climate Change | M € | | 39 | 9 |
| ESRS E2 - Pollution prevention | M € | | 2 | 4 |
| ESRS E3 - Water and marine resources | M € | | 9 | 7 |
| ESRS E4 - Biodiversity and ecosystems | M € | | 0 | 0 |
| ESRS E5 - Resource use & circular economy | M € | | 4 | 5 |
| ESRS S1 - Own workforce | M € | | 3 | 3 |
| ESRS S3 - Affected communities | M € | | 0 | 0 |
| Customers - Entity Specific- adapted from ESRS S4 | M € | | 7 | 7 |
| | | | **57** | **37** |
| **INVESTMENTS IN PRODUCTIVE ASSETS NOT CLASSIFIED AS RESOURCES EARMARKED FOR THEIR ENVIRONMENTAL AND SOCIAL NATURE ACCORDING TO ESRS(**).** | | | | |
| Intangible fixed assets, Property, plant and equipment and biological assets | M € | | **63** | **37** |

(*) "Breakdown by Autonomous Communities" will refer to the fact that this magnitude appears broken down in the notes to the consolidated annual accounts of ENCE for the reference financial year
(**) European Sustainability Reporting Standards as defined in Appendix I of Delegated Regulation (EU) 2023/2772.

## Other

The sustainability report also includes other financial performance indicators (EBITDA, financial debt, etc.) and other financial indicators whose definition, reconciliation, comparison and other characteristics defined in the APM Guidelines are detailed in Appendix I to the Management Report "Group activity in 2025" accompanying the consolidated annual accounts of Ence Energía y Celulosa for the 2025 financial year.

# Appendix VI Relationship of the information with other European standards

| Disclosure requirement and related data point | Reference to the Regulation on sustainability-related disclosures in the financial services sector | Pillar 3 reference | Benchmark Regulation reference | European Climate Law Reference | Page |
|---|---|---|---|---|---|
| ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d) | Item 13 of Table 1 of Appendix 1 | | Delegated Regulation (EU) 2020/1816 of the Commission (5), Appendix II | | 124 |
| ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e) | | | Delegated Regulation (EU) 2020/1816, Appendix II | | 124 |
| ESRS 2 GOV-4 Statement on due diligence paragraph 30 | Item 10 of Table 3 of Appendix 1 | | | | 18, 137 |
| ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i | Indicator no. 4 of Table 1 of Appendix 1 | Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6), Table 1: Qualitative information on environmental risk and Table 2: Qualitative information on social risk | Delegated Regulation (EU) 2020/1816, Appendix II | | 30-33 |
| ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii | Item 9 of Table 2 of Appendix 1 | | Delegated Regulation (EU) 2020/1816, Appendix I | | N/A |
| ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii | Item 14 of Table 1 of Appendix 1 | | Delegated Regulation (EU) 2020/1818 (7), Article 12(1) Delegated Regulation (EU) 2020/1816, Appendix II | | N/A |
| Disclosure requirement and related data point | | | Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Appendix II | | N/A |
| ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d) | | | | Regulation (EU) 2021/1119, Article 2(1) | 124 |
| ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e) | | Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate change transition risk: credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 12(1) (d) to (g), and Article 12(2) | | N/A |
| ESRS 2 GOV-4 Statement on due diligence paragraph 30 | Item 4 of Table 2 of Appendix 1 | Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 6 | | 18, 137 |
| ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i | Item 5 of Table 1 and Item 5 of table 2 of Appendix 1 | | | | 50-51 |
| ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii | Item 5 of Table 1 of Appendix 1 | | | | 50-51 |
| ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii | Item 6 of Table 1 of Appendix 1 | | | | 50-51 |
| ESRS E1-6 Gross scope 1, 2, 3 and total GHG emissions paragraph 44 | Indicator numbers 1 and 2 of Table 1 of Appendix 1 | Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate change transition risk: credit quality of exposures by sector, emissions and residual maturity | Delegated Regulation (EU) 2020/1818, Article 5(1), and Articles 6 and 8(1) | | 79-83, 150 |

| Disclosure requirement and related data point | Reference to the Regulation on sustainability-related disclosures in the financial services sector | Pillar 3 reference | Benchmark Regulation reference | European Climate Law Reference | Page |
|---|---|---|---|---|---|
| ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55 | Item 3 of Table 1 of Appendix 1 | Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics | Delegated Regulation (EU) 2020/1818, Article 8(1) | | 53 |
| ESRS E1-7 GHG removals and carbon credits paragraph 56 | | | | Regulation (EU) -2021/1119, Article 2(1) | 53 |
| ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66 | | | Delegated Regulation (EU) 2020/1818, Appendix II Delegated Regulation (EU) 2020/1816, Appendix II | | Not included. For this information, according to Appendix C of ESRS 1, a moratorium of one year to incorporate qualitative information and up to 3 years to incorporate quantitative information is established. |
| ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c) | | Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5. Banking book - Climate change physical risk: exposures subject to physical risk. | | | |
| ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c). | | Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral. | | | |
| ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69 | | | Delegated Regulation (EU) 2020/1818, Appendix II | | |
| ESRS E2-4 Amount of each pollutant listed in Appendix II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28. | Item 8 of Table 1 in Appendix 1, Item 2 of Table 2 in Appendix 1, Item 1 of Table 2 in Appendix 1, Item 3 of Table 2 in Appendix 1 | | | | 62 ,149 |
| ESRS E3-1 Water and marine resources paragraph 9 | Item 7 of Table 2 of Appendix 1 | | | | 67 |
| ESRS E3-1 Dedicated policy paragraph 13 | Item 8 of Table 2 of Appendix 1 | | | | 64-65 |
| ESRS E3-1 Sustainable oceans and seas paragraph 14 | Item 12 of Table 2 of Appendix 1 | | | | N/A |
| ESRS E3-4 Total water recycled and reused paragraph 28 (c) | Item 6.2 of Table 2 of Appendix 1 | | | | 68 |
| ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29 | Item 6.1 of Table 2 of Appendix 1 | | | | 68 |
| ESRS 2 - IRO 1 - E4 paragraph 16 (a) i | Item 7 of Table 1 of Appendix 1 | | | | 74-77, 151-157 |
| ESRS 2 - IRO 1 - E4 paragraph 16 (b) | Item 10 of Table 2 of Appendix 1 | | | | 74-77, 151-157 |

| Disclosure requirement and related data point | Reference to the Regulation on sustainability-related disclosures in the financial services sector | Pillar 3 reference | Reference to the Regulation on benchmarks | Reference to European legislation on climate benchmarks | Page |
|---|---|---|---|---|---|
| ESRS 2 - IRO 1 - E4 paragraph 16 (c) | Item 14 of Table 2 of Appendix 1 | | | | 74-77, 151-157 |
| ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b) | Item 11 of Table 2 of Appendix 1 | | | | 74-77 |
| ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c) | Item 12 of Table 2 of Appendix 1 | | | | N/A |
| ESRS E4-2 Policies to address deforestation paragraph 24 (d) | Item 15 of Table 2 of Appendix 1 | | | | 73 |
| ESRS E5-5 Non-recycled waste paragraph 37 (d) | Item 13 of Table 2 of Appendix 1 | | | | 86 |
| ESRS E5-5 Hazardous waste and radioactive waste section 39 | Item 9 of Table 1 of Appendix 1 | | | | 86 |
| ESRS 2 - SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f) | Item 13 of Table 3 of Appendix 1 | | | | 163 |
| ESRS 2 - SBM3 - S1 Risk of incidents of child labour paragraph 14 (g) | Indicator no. 12 of Table 3 of Appendix 1 | | | | 91 |
| ESRS S1-1 Human rights policy commitments paragraph 20 | Item 9 of Table 3 and Item 11 of Table 1 of Appendix 1 | | | | 91 |
| ERSR S1-1 Due diligence policies regarding the matters covered by International Labour Organisation Core Conventions 1 to 8, paragraph 21 | | | Delegated Regulation (EU) 2020/1816, Appendix II | | 137 |
| ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22 | Item 11 of Table 3 of Appendix 1 | | | | N/A |
| lNuEgIaSrSd1e-t1raPboPboalíjtoicaapsadrteapdroe2v3ención or accident management system in the | Item 1 of Table 3 of Appendix 1 | | | | 102-104 |
| lNeTrIaScS)1-3 Mechanisms for handling complaints or grievances paragraph 32, | Item 5 of Table 3 of Appendix 1 | | | | 112 |
| ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c) | Item 2 of Table 3 of Appendix 1 | | Delegated Regulation (EU) 2020/1816, Appendix II | | 104 |
| ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e) | Item 3 of Table 3 of Appendix 1 | | | | 104 |
| ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a) | Item 12 of Table 1 of Appendix 1 | | Delegated Regulation (EU) 2020/1816, Appendix II | | 98-99 |
| ESRS S1-16 Excessive pay gap between Chief Executive Officer and workers paragraph 97 (b) | Item 8 of Table 3 of Appendix 1 | | | | 98-99 |
| ESRS S1-17 Incidents of discrimination paragraph 103 (a) | Item 7 of Table 3 of Appendix 1 | | | | 94 |
| ESRS 2 - SBM3 - S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b) | Items 12 and 13 of Table 3 of Appendix 1 | | | | 109 |

| Disclosure requirement and related data point | Reference to the Regulation on sustainability-related disclosures in the financial services sector | Pillar 3 reference | Reference to the Regulation on benchmarks | Reference to European legislation on climate benchmarks | Page |
|---|---|---|---|---|---|
| ESRS S2-1 Human rights policy commitments paragraph 17 | Item 9 of Table 3 and Item 11 of Table 1 of Appendix 1 | | | | 91 |
| ESRS S2-1 Policies related to value chain workers paragraph 1 | Items 11 and 4 of Table 3 of Appendix 1 | | | | 109 |
| ESRS S1-1. Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines paragraph 19 | Item 10 of Table 1 of Appendix 1 | | Delegated Regulation (EU) 2020/1816, Appendix II Delegated Regulation (EU) 2020/1818, Article 12(1) | | 94.133-134 |
| ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 paragraph 19 | | | Delegated Regulation (EU) 2020/1816, Appendix II | | 137 |
| ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36 | Item 14 of Table 3 of Appendix 1 | | | | 109 |
| ESRS S3-1 Human rights policy commitments paragraph 16 | Item 9 of Table 3 and Item 11 of Table 1 of Appendix 1 | | | | 109 |
| ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17 | Item 10 of Table 1 of Appendix 1 | | Delegated Regulation (EU) 2020/1816, Appendix II Delegated Regulation (EU) 2020/1818, Article 12(1) | | 111-112 |
| ESRS S3-4 Human rights issues and incidents paragraph 3 | Item 14 of Table 3 of Appendix 1 | | | | 112 |
| ESRS S4-1 Policies related to consumers and end-users paragraph 16 | Item 9 of Table 3 and Item 11 of Table 1 of Appendix 1 | | | | 118 |
| ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17 | Item 10 of Table 1 of Appendix 1 | | Delegated Regulation (EU) 2020/1816, Appendix II Delegated Regulation (EU) 2020/1818, Article 12(1) | | 118-120 |
| ESRS S4-4 Human rights issues and incidents paragraph 35 | Item 14 of Table 3 of Appendix 1 | | | | 118-120 |
| ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b) | Item 15 of Table 3 of Appendix 1 | | | | 131-132 |
| ESRS G1-1 Protection of whistleblowers paragraph 10 (d) | Item 6 of Table 3 of Appendix 1 | | | | 129-130 |
| ESRS G1-4 Violation of anti-corruption and anti-bribery laws paragraph 24 (a) | Item 17 of Table 3 of Appendix 1 | | Delegated Regulation (EU) 2020/1816, Appendix II | | 131-132 |
| ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b) | Item 16 of Table 3 of Appendix 1 | | | | 131-132 |

## Appendix VII External verification report

KPMG

# Ence Energía y Celulosa, S.A. and Subsidiaries

**Limited Assurance Report Issued by an Assurance Provider on the Consolidated Non-Financial Information Statement (NFIS) and Sustainability Reporting**

**31 December 2025**

***(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)***

KPMG

KPMG Auditores, S.L.
Paseo de la Castellana, 259C
28046 Madrid

## Limited Assurance Report Issued by an Assurance Provider on the Consolidated Non-Financial Information Statement and Sustainability Reporting of Ence Energía y Celulosa S.A. and subsidiaries for 2025

*(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)*

To the Shareholders of Ence Energía y Celulosa, S.A.

### Limited Assurance Conclusion

Pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the Consolidated Non-Financial Information Statement (hereinafter NFIS) of Ence Energía y Celulosa, S.A. (hereinafter the Entity) and its subsidiaries (hereinafter the Group) for the year ended 31 December 2025, which forms part of the consolidated Directors' Report of the Group.

The content of the NFIS includes additional information to that required by prevailing mercantile legislation concerning non-financial information, specifically including the sustainability reporting prepared by the Group for the year ended 31 December 2025 (hereinafter the sustainability reporting) in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 as regards corporate sustainability reporting (CSRD). This sustainability reporting has also been subject to limited assurance review.

Based on the procedures conducted and the evidence we have obtained, no issues have come to our attention that would lead us to believe that:

a) The Group's Non-Financial Information Statement for the year ended 31 December 2025 has not been prepared, in all material respects, in accordance with the contents included in prevailing mercantile legislation and with the selected European Sustainability Reporting Standards (ESRS) or other criteria described in accordance with each subject matter in the "Annex IV Table of contents Law 11/2018 and CSRD" table of the aforementioned Statement" table of the aforementioned statement.

b) the sustainability reporting as a whole has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in the accompanying note "1.4.6.2 About this report", including:

- That the description provided of the process to identify the sustainability reporting included in note "1.4.4 Double materiality analysis" is consistent with the process in place and that it identifies the material information to be disclosed in accordance with the requirements of the ESRS.
- Compliance with the ESRS.
- Compliance of the disclosure requirements, included in subsection "2.1 Taxonomy" of the environmental section of the sustainability reporting with article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

# Appendix VII External verification report



## Basis for Conclusion

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Revised Guidelines 47 and 56 issued by the Spanish Institute of Registered Auditors on assurance engagements on non-financial information and considering the content of the note published by the ICAC on 18 December 2024 (hereinafter generally accepted professional standards).

The procedures applied in a limited assurance engagement are less extensive compared to those required in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the level of assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those standards are described in more detail in the *Responsibilities of the assurance provider* section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) of the International Ethics Standards Board for Accountants (IESBA Code of Ethics), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1 (ISQM 1), which requires a quality management system to be designed, implemented and operated that includes policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

## Emphasis of Matter

We draw attention to what is stated in note "1.4.6.2 About this report" of the NFIS, where it is mentioned that the Consolidated Statement of Non-Financial Information and Sustainability Information is presented as a separate document from the consolidated Management Report, of which it forms part, as this is one of the options contemplated in Law 11/2018 regarding non-financial information. Our conclusion is not modified in respect of this matter.

## Directors' Responsibilities

The preparation of the NFIS included in the Consolidated Directors' Report of the Group, and the content thereof, is the responsibility of the Directors of Ence Energía y Celulosa, S.A. The NFIS has been prepared in accordance with prevailing mercantile legislation and the selected ESRS and other criteria described in accordance with each subject matter in the "Annex IV Table of contents Law 11/2018 and CSRD" table of the aforementioned statement.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the NFIS is free from material misstatement, whether due to fraud or error.

The Directors of Ence Energía y Celulosa, S.A. are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the NFIS was obtained.



In relation to sustainability reporting, the entity's Directors are responsible for developing and implementing a process to identify the information to be included in sustainability reporting in accordance with the CSRD, the ESRS and article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 and for disclosing information about this process in the sustainability disclosures themselves in note "1.4.4 Double materiality analysis." This responsibility includes:

- understanding the context in which the Group's business activities and relationships are conducted, and its stakeholders, in relation to the Group's impact on people and the environment.
- identifying actual and potential impacts (both negative and positive), and any risks and opportunities that might affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing and the cost of capital in the short, medium or long term.
- evaluating the materiality of the impacts, risks and opportunities identified.
- making assumptions and estimates that are reasonable in the circumstances.

The Directors are also responsible for the preparation of sustainability reporting, including the information identified by the process, in accordance with the sustainability reporting framework applied, including compliance with the CSRD, compliance with the ESRS and compliance with the disclosure requirements included in the subsection "2.1 Taxonomy" of the environmental section of the sustainability reporting with article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- Designing, implementing and maintaining such internal control as the Directors determine is relevant to enable the preparation of sustainability reporting that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for sustainability reporting and making assumptions and estimates that are reasonable in the circumstances for specific disclosures.

## Inherent Limitations in the Preparation of the Information

In accordance with the ESRS, the entity's Directors are required to prepare prospective information based on assumptions, which are to be included in the sustainability reporting, about events that may occur in the future, as well as possible future actions, if any, that the Group may take. The actual outcome may differ significantly from the estimate, as it refers to the future and future events often do not occur as expected.

In determining sustainability disclosures, an entity's management interprets legal and other terms that are not clearly defined and may be interpreted differently by other people, including the legal conformity of such interpretations, and are therefore subject to uncertainty.

## Responsibilities of the Assurance Provider

Our objectives are to plan and perform the assurance engagement in order to obtain limited assurance about whether the NFIS and sustainability reporting is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report containing our conclusions

# Appendix VII External verification report



thereon. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we apply our professional judgement and maintain an attitude of professional scepticism throughout the engagement. We also:

- Design and implement procedures to assess whether the process for identifying the information to be included in both the NFIS and sustainability reporting is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of material information to be disclosed in accordance with the requirements of the ESRS.
- Apply risk-based procedures, including obtaining an understanding of internal controls relevant to the engagement in order to identify the disclosures in which it is most likely that material misstatements arise, whether due to fraud or error, but not for the purpose of providing a conclusion about the effectiveness of the Group's internal control.
- Design and implement procedures that respond to disclosures in both the NFIS and sustainability reporting in which material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

## Summary of the Work Carried Out

A limited assurance engagement includes performing procedures to obtain evidence to support our conclusions. The nature, timing and extent of the procedures selected depend on professional judgement, including an identification of the disclosures in which material misstatements, whether due to fraud or error, are likely to arise in the NFIS and sustainability reporting.

Our work has consisted of making inquiries of management, as well as of the different units and components of the Group that have participated in the preparation of the NFIS, reviewing the processes for compiling and validating the information presented in the NFIS and sustainability reporting and applying certain analytical procedures and sample review tests, which are described below:

In relation to the NFIS assurance review process:

- Meetings with the Group's personnel to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFIS for 2025 based on the materiality analysis performed by the Group and described in the "1.4.4 Double materiality analysis" section, considering the content required by prevailing mercantile legislation.
- Analysis of the processes for compiling and validating the data presented in the NFIS for 2025.
- Review of the information related to the risks, policies and management approaches applied in relation to the material aspects presented in the NFIS for 2025.
- Corroboration, through sample testing, of the information relative to the content of the NFIS for 2025 and whether it has been adequately compiled based on data provided by the information sources.



In relation to the assurance on sustainability reporting process:

- Making inquiries of Group personnel:
  - to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
  - to understand the source of information used by management (e.g. stakeholder interaction, business plans and strategy documents); and the review of the Group's internal documentation on its process.
- Gaining, through inquiries with Group personnel, an understanding of the entity's processes for collecting, validating and presenting information relevant to the preparation of its sustainability reporting.
- Assessing the consistency of the evidence obtained from our procedures on the Group-implemented process to determine the information to be included in sustainability reporting with the description of the process included in such disclosures and assessing whether the Group-implemented process identifies the material information to be disclosed in accordance with the requirements of the ESRS.
- Assessing whether all the information identified in the Group-implemented process to determine the information to be included in sustainability reporting is effectively included.
- Assessing the consistency of the structure and presentation of sustainability reporting with the provisions of the ESRS and the rest of the sustainability reporting framework applied by the Group.
- Conducting inquiries of relevant personnel and analytical procedures on information disclosed in the sustainability reporting, considering information in which material misstatements are likely to arise, whether due to fraud or error.
- Performing, where appropriate, substantive sampling procedures on the information disclosed in the selected sustainability reporting, considering information in which material misstatements are likely to arise, whether due to fraud or error.
- Procuring, where applicable, the reports issued by accredited independent third parties accompanying the consolidated Directors' Report in compliance with EU regulations and, in relation to the information to which they refer and in accordance with generally accepted professional standards, confirming, exclusively, the accreditation of the assurance provider and that the scope of the report issued complies with EU regulations.
- Procuring, where appropriate, the documents containing the information included by reference, the reports issued by auditors or assurance providers of such documents and, in accordance with generally accepted professional standards, confirming, exclusively, that, as regards the document to which the information included by reference, the conditions described in the ESRS for including information by reference in the sustainability reporting are met.
- Procuring a representation letter from the Directors and management regarding the NFIS and sustainability reporting.

## Other Information

The Directors of Ence Energía y Celulosa, S.A. are responsible for the other information. The other information comprises the consolidated annual accounts and other information included in the consolidated Directors' Report but does not include either the auditor's report on the consolidated

# Appendix VII External verification report



annual accounts or the assurance reports issued by accredited independent third parties required by EU law on specific disclosures contained in the sustainability reporting and accompanying the consolidated Directors' Report.

Our assurance report does not cover the other information, and we do not express any assurance conclusions about it.

In connection with our assurance engagement on the sustainability reporting, our responsibility consists of reading the other information identified above and, in doing so, consider whether there is a material inconsistency between the other information and the sustainability reporting or the knowledge we have obtained during the assurance engagement that could be indicative of material misstatements in the sustainability reporting.

KPMG Auditores, S.L.

*(Signed on original in Spanish)*

*Marta Contreras*

*24 February 2026*

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ENERGÍA & CELULOSA