



ENVIRONMENTAL COMPLIANCE POLICY

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GENERAL PRINCIPLES OF ACTION

The environment, preservation, and sustainable development are critical to all companies belonging to the SANDO GROUP and are the basis of their identity and corporate values.

That is why SANDO is committed to carrying out its activity with the utmost respect for the environment, thereby improving people's quality of life.

Likewise, SANDO's vision is to be the benchmark company in the areas of activity it develops, applying excellence, innovation, dialogue and sustainable development.

To this end, the Group develops its corporate purpose under the following principles of action:

- ✓ Ensure the quality of products and services, considering they meet customer commitments and are consistent with local needs.
- ✓ Prioritise and respect biodiversity and improve the organisation's environmental performance by reviewing environmental aspects, improving programmes and raising awareness among its professionals.
- ✓ Promote the efficient and sustainable use of natural energy resources to reduce environmental impacts.
- ✓ Ensure compliance with the legal and regulatory commitments applicable to the products and services managed.
- ✓ Collaborate with authorities, organisations, and public or private entities to promote actions for environmental improvement.

SANDO's commitment to the preservation of the environment, which underpins this policy, is embodied in scrupulous compliance with all environmental regulations applicable to it in the development of its activity, as well as in the establishment of the necessary mechanisms for a rapid and effective reaction to any incident or complaint related to the environment.

KEY POINTS TO KEEP IN MIND

The purpose of this policy is to specify the general principles of action of SANDO in the performance of activities linked to its activity that have a potential impact on the environment, to preserve it and to improve the quality of life of the communities in which the company is present.

SANDO's firm commitment to preserving the environment is based on strict compliance with all administrative regulations on environmental protection that apply to the company's activity at state, regional and local levels.

Spanish law prohibits and punishes the following conduct, whether intentional or the result of gross recklessness or carelessness:

- The performance of any direct or indirect action with an impact on any element that makes up the environment (atmosphere, soil, subsoil or terrestrial, maritime or underground waters) that contravenes the laws or regulatory provisions of a general nature protecting the environment and that may seriously damage the balance of natural systems, without the need to cause damage.
- The operation of facilities where a dangerous activity is carried out or in which hazardous substances are stored or used that contravene the administrative regulations protecting the environment and may harm people, flora, fauna or the elements above the environment.
- The establishment of waste deposits or landfills that are toxic or hazardous and may seriously harm the balance of natural systems or human health without necessarily causing harm.

The above conducts are punishable by severe penalties for the natural person (up to 5 years in prison in some cases and a fine) and the company on behalf of which that natural person eventually acts (fines, suspension of activities, prohibition of public procurement, etc.).

SANDO's commitment to compliance with these laws and the principles that inspire them is absolute in every area of its activity and is an essential part of the development of its activity under the principles of ethics, transparency and excellence.

The rules of action of this policy are mandatory for the professionals of the SANDO Group (administrators, managers and employees) (the "Professionals"), as well as for other collaborators, consultants, agents or contracted third parties, and, primarily, by those persons assigned competences and responsibilities in the management of activities with a potential impact on the environment within the organisation.

In this sense, an essential element for the proper development of its corporate purpose is the designation of people with the appropriate training and knowledge for the management of these areas of activity, providing them with the necessary material and human resources, and establishing adequate supervision and monitoring systems, as well as dynamic flows of information in these matters.

This environmental compliance policy will be communicated to all Professionals.

There is a *Communication Channel* (through the e-mail address **canaldenuncias@sando.com**) available to all SANDO Professionals that will answer and resolve any questions, doubts or uncertainties regarding the application of this policy in each specific case.

Failure to comply with the provisions of this policy or any of the rules of conduct contained therein will lead to disciplinary sanctions that, where appropriate, may lead to the termination of the employment or commercial relationship that the offender maintains with SANDO.

RULES OF ACTION IN THE DEVELOPMENT OF ACTIVITIES WITH AN ENVIRONMENTAL IMPACT

The following describes the rules of action that govern the development of SANDO's activities with an environmental impact. The company complies with these rules and will ensure they are maintained.

1. Environmental Permits: Obtaining, Validity, and Compliance

Single.- SANDO is unconditionally concerned with having, keeping in force, and complying with the required administrative permits (authorisations, concessions, licenses, registrations and communications) under the applicable regulations. Likewise, all these permits and the official documents of the Public Authorities exempt from the obligation to obtain an administrative license are kept.

2. Environmental Vectors

a. Emissions

First.- The corrective and preventive measures provided for in the environmental regulations and permits are adopted, where appropriate, aimed at minimising the impact of gas emissions into the atmosphere, noise

and odours that the Facilities may generate. If this is necessary, the actions are communicated to the competent Authority.

Second.- The applicable limit values for the emission of gases into the atmosphere, odours and noise are complied with, adopting, where appropriate, the necessary control measures to ensure compliance with the above limits.

b. waste

First.- In those facilities where waste is generated, the applicable obligations of production, management, storage, transport, labelling and packaging are complied with.

The guidelines established in the internal documents prepared for this purpose are followed for the correct production, management, identification, packaging, labelling, storage and transport of waste.

Second.- The deposit or dumping of toxic or hazardous waste is prohibited without the corresponding authorisation or in non-compliance with the corrective measures imposed concerning this issue. Toxic and hazardous waste is identified and managed by managers authorised by the competent Authority.

Third.- Waste treatment and storage facilities are maintained in the necessary conditions to guarantee treatment and storage under the applicable regulations and permits.

c. Major Accidents, Chemicals and Hazardous Substances

First.- All preventive and control measures are adopted for severe accidents (spills, fires, explosions, etc.) that may pose serious risks to people, property or the environment. Likewise, measures are adopted to minimise its impact on people, goods and the environment if it occurs.

Second.- The storage area for hazardous substances and chemical products is equipped to prevent and manage any accident or incident that may occur and complies with the applicable supplementary technical instructions.

Third.- Chemical products are identified, stored and handled in safe conditions under the terms defined by the applicable regulations. Likewise, the available means and a maintenance program are determined to avoid the spill. In the event of a chemical spill, the procedure must be under the *Emergency Plan* for each facility.

d. Soil quality

Unique. - The development of SANDO activities is prevented from causing soil contamination. Likewise, if required by the applicable regulations, the corresponding reports on soil quality are prepared and, where appropriate, sent to the authorities.

3. Control mechanisms

Unique. - All Facilities have and comply with the existing control mechanisms to ensure compliance with the rules of action described in this policy, which are applicable because of the type of activity.

4. Action plans in the event of any breach of the rules of action or abnormal operation of the facilities

Unique. - If non-compliance with the rules of action described in this policy is detected, an abnormal operation of the facilities derived from any cause, or an accident linked to any of the aforementioned environmental vectors, action will be taken under the Emergency Plans existing at the company's facilities. If these plans do not foresee the specific circumstance, the necessary measures must be taken to return to normality or compliance with the rules of action.

REPORTING OF NON-COMPLIANCE

Any SANDO employee who becomes aware of an action that violates this policy or constitutes a breach of any of its rules of conduct must report it to the *Compliance Body* by any of the following means:

- Through the Whistleblowing Channel enabled on the SANDO intranet
- By letter addressed to:

Criminal Enforcement Body

Avenida José Ortega y Gasset, 112 – SANDO Building
29006 - Malaga

All reports of violations of this policy and its rules of conduct will be considered and appropriately investigated.

Such notification will be protected by confidentiality as long as it is given in good faith.

COMMUNICATION OF THIS POLICY

This ENVIRONMENTAL COMPLIANCE POLICY will be communicated to all administrators, managers and employees of SANDO, as well as periodic actions to raise awareness and remind them of its existence.

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NOTE: This policy is annexed to the Protocol on the Prevention and Detection of Crimes, approved **by the SANDO Board of Directors at its meeting on April 30, 2021.**