



Engine Power Components Group Europe

ENVIRONMENTAL STATEMENT FOLLOWING EMAS REGULATIONS EIBAR PLANT, GIPUZKOA, SPAIN

YEAR 2024



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1. Presentation of the Statement

Engine Power Components Group Europe, S.L. (hereinafter EPC GE, S.L.) is a large-scale manufacturer of precision components for engines, more specifically camshafts.

Being aware of the environmental impact caused by its operations, and of the public's increasing awareness of the environment, EPC GE S.L. implemented an Environmental Management System in 2018, based on the UNE-EN-ISO 14001:2015 standards and EMAS regulations.

This Environmental Statement has been drawn up following the regulatory provisions below:

- Commission Regulation (EU) 2018/2026 of 19 December 2018 amending Annex IV to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS).
- Commission Regulation (EU) 2017/1505 of 28 August 2017 amending Annexes I, II and III to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS).
- EC Regulation No 1221/2009 of the European Parliament and the Council on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS).

With this Statement, EPC GE S.L.'s EIBAR plant aims to provide information on all significant aspects and activities associated with its business to stakeholders.



2. Profile of the Organisation

2.1. Presentation

EPC GE S.L. is the operational and production base for the European market of Engine Power Components, Inc. Due to operational reasons and the type of product, EPC GE S.L. also has a production plant, EPC MX, in Torreón in Mexico.

However, this environmental statement applies solely to the EPC GE plant in Eibar.

Products manufactured both in EPC GE S.L. and EPC MX are mainly destined for the industrial and/or agricultural vehicle sector, and to a lesser extent, passenger vehicles - cars and motorcycles.

The market for these products is divided into spare parts and original equipment, mainly the latter.

The general details of the company are as follows:

CNAE: (National Classification of Economic Activities):	29.32 - Manufacture of parts, pieces and non-electric accessories for the automotive industry.
TAX ID:	B-75066902
NIRI (Registration number in the Industrial Register):	20-26409
Company Name:	ENGINE POWER COMPONENTS GROUP EUROPE, S.L.
Address:	Polígono Industrial Azitain nº5 Eibar C.P. 20.600 (Gipuzkoa)
Telephone:	943 820 010
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Contact:	Silvia González de Herrero
Representative of Management:	Quality and Environment Manager
E-mail:	sgonzalez@epcge.com
Registration N°:	ES-EU-000090



2.2. EPC GE, S.L. in numbers

Table 1. Characteristics of EPC GE, S.L.

		2021	2022	2023	2024
Camshaft production	Production <u>Steel</u> (t)	683.3	802.14	829.32	736.86
	Production <u>Casting</u> (t)	1,178.13	1,337.99	1,173.95	1,047.39
	TOTAL PRODUCTION (t)	1,861.43	2,140.13	2,003.27	1,784.25
Resources	Total consumption of electricity (MWh)	3,985.74	4,175.17	3,954.00	3,825.44
	Consumption of natural gas (MWh)	596.67	773.68	725.81	674.76

Source: EPCGE, S.L.

3. Environmental objectives

The environmental objectives of EPC GE S.L. are established and approved by the Steering Committee, which first collects proposals and suggestions and takes into account the environmental and energy aspects that are significant to the company.

Table 2. Environmental Program 2024

Objectives*	Goals and Actions	Supervisor	Deadline	Extent of completion of planned actions
2% reduction in energy consumption	Installation of scrubbers (evaporative units) to reduce the temperature in the workshop and avoid the use of individual industrial fans. This improves comfort and sustainability of machines. Large/small scrubbers depending on the m3. 6 installations in August.	Industrial/ Maintenance	2nd half of 2025	84% (3 scrubbers have been accounted for in addition to those of the previous year, in which 100% compliance was achieved)
10% reduction of contaminated absorbents and consumption of filters Savings on 9 machines of filters, kits and sponges.	Installation of joint suction system for the lines. Connecting machines of the same line to a central ventilation system, thus reducing maintenance time on equipment and consumption of filters. Connected HHP2: 39, 38, 2013, 265, 228 Connected HHP1: 33, 2012, 228 (enclosure), 274 To be connected HHP3+Cam Zone. To be carried out after moving lathe 39. (Connection 10 machines)	Maintenance	December 2024	67% (2/3 of the line connection actions carried out)
Self-generation of energy approx. 10% of total consumption (solar panels)	Study of quotations. Installation of 450 kWh rated power plant	Energy management team	1st semester 2024	25% (Offer accepted, pending signature, planning and installation)

Objectives*	Goals and Actions	Supervisor	Deadline	Extent of completion of planned actions
2% reduction in water consumption	An external tank collects rainwater and water from the evaporator. Possible pre-treatment	Maintenance	Under study	10% The action is cancelled, although monitoring continues
27% reduction in waste from coolant lubricant to prevent grinding burns	KAIA project with sensor technology to analyse layer depth and feasibility of ultrasonic testing (avoiding metallographic cutting and destructive testing)	Technical assistant	December 2024	40% Study with the CEIT carried out, pending project continuation
	2nd Barkhausen machine, more flexible with improved design. Arrival of machine	Technical assistant	December 2024	90% Pending installation
	Machine in production	Technical assistant	December 2024	80% Pending carrying out certain verification programmes

* All the objectives are compared with the previous year, except that relating to the reduction of grinding burn liquid waste, which is compared to financial year 2022.

As far as **fulfilment of the aforementioned objectives** is concerned, we can conclude that:

Objective 1: 2% reduction in energy consumption (MWh/t total production)

After all lighting in the workshop and offices was replaced with LED lighting, in order to further reduce consumption, motion detectors were installed in changing rooms, transit areas and common areas to reduce energy consumption.

Although these actions have contributed to reducing energy consumption in absolute terms by more than 4% with respect to the base year (2021) and by 3% with respect to the previous year (2023), in terms relating to total production, the indicator result has been unfavourable, it has remained constant in relation to the base year (2021) and increased by 8.6% in relation to the previous year (2023).

Despite the implemented actions contributing positively to the energy efficiency of the plant, the impact of these measures has not been sufficient to compensate for the increasing consumption due to other factors. Likewise, the reduction of the production level by 11% means that the indicators relating to the energy performance are more unfavourable as the manufacturing processes are less efficient.

In subsequent years, actions aimed at the optimisation of electrical consumption will continue, including the implementation of measures such as the installation of scrubbers intended to reduce the ambient temperature in the workshop, with the aim of removing the need for individual industrial fans. This action, initially planned, has been rescheduled for implementation during the 2026 financial year. Likewise, the installation of a photovoltaic generation system is being considered, the start-up of which is planned for financial year 2025 and which will also contribute to significantly reducing electrical consumption.

Objective 2: Reduction of contaminated absorbents and filter consumption by 10% (kg waste of contaminated material and oil and coolant filters / t steel production)

During the 2024 financial year, the installation of a joint intake system was completed in workshop section HHP3. This measure has made it possible to optimise the management of diffuse emissions, significantly reduce the use of contaminated absorbents and eliminate individual filters in the HHP production lines, thus improving the efficiency of the environmental control system.

However, as part of the transition process and commissioning of the new system, the generation of contaminated material waste has increased by 5.73% and the generation of filter waste by 80% in absolute terms. Likewise, overall and in relative terms per tn of steel production, the objective compliance indicator has been unfavourable, as generation has increased by 21% with respect to the previous year.

This increase is principally due to more intensive cleaning operations during the implementation phase, as well as the temporary reinforcement of preventive containment measures in critical areas. It is expected that, once the operation of the new system has stabilised, the consumption of sepiolite will go back to normal and reflect the expected improvement in the reduction of absorbent waste and emissions.

Objective 3: Self-generation of energy approx. 10% of total consumption (solar panels)

During this financial year, the analysis of different technical alternatives has continued, including the request and assessment of budgets, as well as the study of technical, economic and operational viability of the proposed measure.

Objective 4: 2% reduction in water consumption

A preliminary study has been carried out for the installation of an external tank for the collection of rainwater and the use of water from the evaporator, including a possible pre-treatment system.

Although the measure has limitations as regards technical and economic viability due to its complexity and associated costs, its future implementation is not ruled out.

Nevertheless, it was decided to temporarily postpone it in order to prioritise other actions with greater environmental impact and better cost benefit ratio in the short term.

Objective 5: 27% reduction in waste from liquid to prevent grinding burn (kg of waste from liquid used to prevent grinding burn/ t steel production)

Products manufactured in steel require the systematic application of grinding burn control in order to ensure the quality of the final product. While it has not been possible to completely eliminate the generation of liquid waste associated with this control during the 2024 financial year, a significant reduction in its volume has been achieved.

In addition, during this period, differentiated management of burn control liquid has been implemented with respect to coolant, which has allowed them to be individually accounted for. Together, the generation of this liquid waste has been reduced by 79% in comparison with the 2021 financial year.

The programme of objectives for **2025** continues to consider significant environmental aspects, including measures that will address those that were not fully completed or reached in 2024, such as:

Objective 1: Self-generation of energy approx. 10% (solar panels)

Continued implementation of solar panels.

Objective 2: 10% reduction in scrap waste (kg scrap waste / t production) for 2027

CAPALEV Project: implementation of a hardness measurement system by means of ultrasounds, which avoids the need for cutting parts and contributes to the reduction of waste.

During 2025 - 2026, a baseline will be established from which the evolution of the scrap generation indicator will be measured.

4. Environmental Management System

4.1 Introduction

EPC GE S.L., well aware of the environmental impact caused by its operations, which includes transport of raw materials and products, decided in 2013 to start a process to develop and implement an environmental management system.

The company started by implementing an environmental management system complying with the ISO 14001 standard, which was subsequently adapted to comply with EMAS regulations, and entered the Community System for Environmental Management and Audit in late 2014. In 2017, the Management System was adapted to the updated ISO 14001:2015 standard, also new EMAS regulations.

In addition, throughout 2016, an energy efficiency system was implemented and certified, according to the framework ISO 50001:2011 standard, which has been integrated into the current environmental management system.

Organisational context analysis.

An analysis of the organisational context is carried out annually, in which internal and external issues of relevance that may have an impact on the organisation's environmental management are analysed.

The annual risk and opportunity analysis was also carried out in 2024. Both analyses have yielded the following action or aspects to be taken into account:

- Carbon footprint calculation with scope 1+2+3
- New heavy-duty vehicle emissions legislation
- Greater need for maintenance of the facilities due to the increase of adverse weather conditions (hail, wind, etc.).
- Increases in applicable legal requirements due to greater awareness of society of climate change.

Analysis of stakeholders.

In the same way as the identification of stakeholders for the organisation is carried out, their needs and expectations are determined. These needs and expectations of stakeholders are taken into account in the planning of the management system, thereby addressing the interests of customers, suppliers, employees, administration, society and others.

4.2 Environmental Management System at EPC GE, S.L.

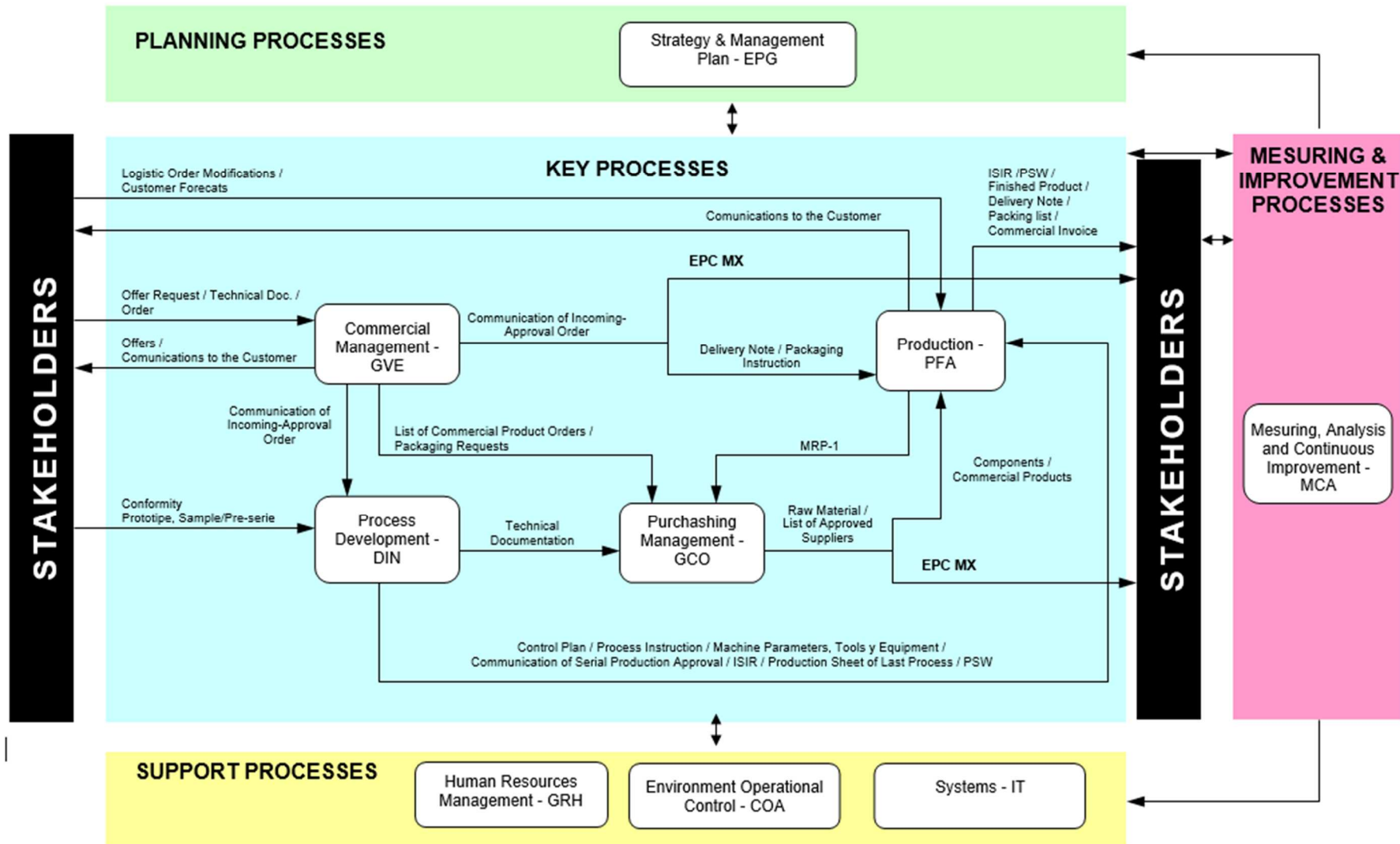
EPC GE S.L.'s environmental management system includes the following tools:

- Organisation: To establish the environmental strategy by the quality and environment department together with the other departments comprising the company's management committee.
- Planning: For the required actions and resources to fulfil environmental objectives approved by the management.
- Environmental Audits: Since the main instrument to manage the company's environmental assessment and monitoring and operating practices is the Environmental Audit Plan.
- Training: Actions on training and environmental awareness at all levels in the company are essential in order to be able to implement a sustainable corporate culture.

The management at EPC GE S.L. is strongly committed to the development and implementation of the EMS through the following activities:

- Informing the rest of the organisation of the importance of meeting the client's, legal and regulatory requirements.
- Informing the rest of the organisation and external stakeholders of the main environmental impacts and aspects, and results of EPC GE S.L.'s environmental performance through the Environmental Statement according to EMAS regulations.
- Establishing the quality and environment policy and objectives.
- Review of the system by the management.
- Guaranteeing the availability of resources and information required.

The processes implemented that guarantee these commitments are documented in the following process map:



4.3 Environmental Policy

EPC GE S.L. expressed its commitment to the environment through its quality and environment and energy efficiency policy in its latest edition in January 2025.

All EPC GE, S.L. personnel have access to this policy, through publication on the document server and on the notice boards and central offices of the plant.

In addition, this policy is accessible and within the reach of all stakeholders at EPC GE S.L. through publication of the Environmental Statement on the web page www.engpwr.com.

QUALITY, ENVIRONMENT AND ENERGY EFFICIENCY POLICY

Engine Power Components Group Europe, S.A. (EPC GE, S.A.) is a large-scale manufacturer of precision components for engines (camshafts and balancer shafts), for the automotive sector and general industry.

Our strategic objectives are the Company's profitability, respect for and commitment to the environment and being leading manufacturers in our sector. To achieve these goals, we recognise that total client satisfaction and minimising our environmental impact, particularly from energy consumption, are essential. Therefore, we are dedicated to purchasing efficient products and services to improve our energy performance.

The products and services, aimed at both the market for OEM parts and spares, must achieve a maximum level of performance, and ensure compliance with all requirements of our customers, as well as with the legal requirements and other applicable requirements.

Our systems, both for quality, the environment and energy management, continuous improvement in our performance, our staff, their development and safety, are the key instruments in reaching our goals.

EPC GE S.L. undertakes to offer equal treatment to all who have a working relationship with the company, and to anybody related to the company (suppliers, customers, users, etc.), and upholds a firm commitment to non-discrimination by promoting action plans and protocols for the prevention, action and handling of situations and behaviours that may constitute violent and/or discriminatory acts or conduct (workplace/sexual harassment based on sex, sexual orientation and identity).

The commitments acquired through this policy provide the framework for the company to establish aims and objectives promoting continuous improvement and are key instruments in achieving our purpose. Therefore, the company has made available all the information and resources required for success.

Engine Power Components Group Europe, S.L., January 27, 2025

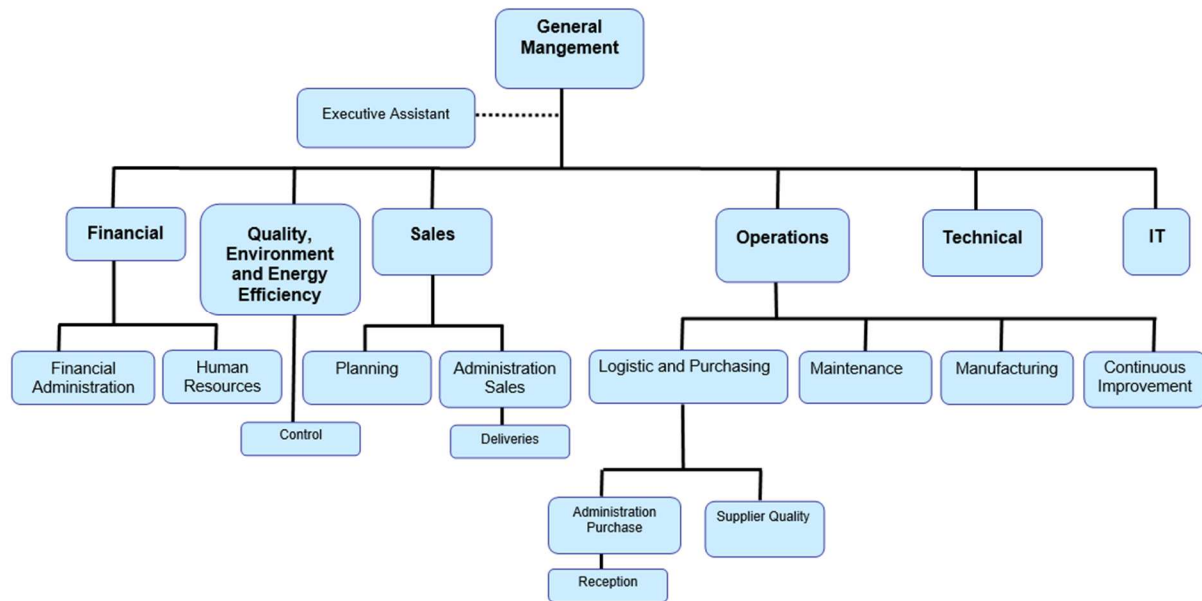


Iñigo Pérez-Arregui // EPC GE General Manager

4.4 Functions and responsibilities

The quality and environment management is responsible for coordinating and monitoring the environmental management system. It depends directly on the General Management, with there being another 6 management departments in the company: Financial, Sales, Operations, Engineering and IT Management.

The organisational chart at EPC GE S.L. is as follows:



The environmental management system at EPC GE S.L. is fully integrated into the daily activity in the company, and therefore all responsibility arising from its implementation is shared among the various managers, and the whole is coordinated by the quality and environment department.

4.5 Environmental aspects

EPC GE, S.L. has implemented an instruction IN EPG-2, subordinate to the strategy process and management plan, to identify, evaluate and record the environmental aspects of its operations, both in normal conditions (i.e. controlled, normal and planned operating conditions) and abnormal conditions (operations during scheduled shutdown for maintenance and similar), as well as in potential emergency situations.

This instruction applies to all operations/facilities that may have an impact on the environment and that are carried out/present in the main office, plant and storage facilities of EPC GE, S.L.

EPC GE, S.L. identifies, quantifies and evaluates the operations/facilities on a yearly basis or whenever modifications take place in order to determine those with the greatest impact during the performance of its operations.

These most significant aspects resulting from the evaluation are taken into account when the environmental objectives of the enterprise are drawn up.

First, the term Environmental Aspect should be defined as "an element in activities, products or services from an organisation that may interact with the environment."

There are two types of environmental aspect:

- Direct environmental aspect: An environmental aspect arising from the company's operations, products or services, and which the company can deal with directly and be in control of the process.
- Indirect environmental aspect: An environmental aspect not arising from the company's operations, products or services, but in others deriving from these and on which the company has no direct influence and process control.

The criteria for evaluating the direct aspects and defining the significant ones are as follows:

- A. **Magnitude**: meaning the amount of environmental aspects
- B. **Toxicity and hazard**: takes the danger and toxicity of each aspect into account.
- C. **Extent**: Interpreted as the area or zone affected by any environmental impact, so that greater importance is given to risks affecting larger areas or zones.
- D. **Probability**: The possibility of a hazardous environmental aspect causing an incident.
- E. **Opinion or complaints** from external interested parties.

To assess each environmental impact identified and decide on which are significant, criteria are applied according to the following table:

Environmental aspects	Criteria applied
Consumption	A, B and E
Waste	A, B and E
Effluents	A, B and E
Emissions	A, B and E
External noise	A, B and E
Contaminated ground	A, B and E
Environmental emergencies (environmental hazards)	B, C and D

The overall rating of the aspect, representing its significance, except for environmental emergencies, is obtained by multiplying the partial ratings for each of the assessment criteria.

Minimum global rating = 1 (1*1*1) and maximum = 27 (3*3*3).

Environmental emergencies (environmental hazards) are evaluated by applying the following:

Hazard = Probability x Severity, taking severity as the mean value of the extent and toxicity, i.e.:

$$\text{Riesgo} = \text{Pr obabilidad} \times \text{Gravedad} = \text{Pr obabilidad} \times \frac{(\text{extensión} + \text{toxicidad})}{2}$$

After obtaining the global assessment of each aspect as a numerical value, significant aspects are 10% of the aspects that receive the highest score. In the event that a sufficient and representative number of significant aspects cannot be achieved, those that score highest on the magnitude criterion will be included as significant.

Indirect environmental aspects will be evaluated depending on whether they are generated internally in EPC GE, S.L. plants or externally.

Those generated internally in EPC GE S.L. plants will be assessed according to the following criteria:

1. **Potential Severity:** possible damage caused by the identified indirect environmental aspect.
2. **Control:** the environmental behaviour shown by the originating source, agent or supervisor of the aspect through non-conformities.
3. **Frequency:** the number of times per year that the environmental aspect occurs.

Indirect aspects generated outside EPC GE S.L. plants will be assessed according to the following criteria:

1. **Degree of environmental impact:** scale of natural resources affected by the environmental aspect.
2. **Level of preoccupation of interested parties:** number of interested parties with complaints, suggestions, needs or expectations relating to the environmental aspect.
3. **Viability of implementing improvement actions:** existence and difficulty in implementing improvement opportunities relating to the environmental aspect.

The global rating of the aspect is obtained by multiplying the partial ratings for each of the assessment criteria.

The company considers significant indirect environmental aspects to be those scoring higher than 9 points.

4.5.1 Direct

The significant direct environmental aspects given below refer to the whole of EPC GE S.L., including all facilities, and result from the identification and evaluation made based on information available from 2024.

Table 3. Significant direct environmental aspects

SIGNIFICANT DIRECT ENVIRONMENTAL ASPECTS	
SOURCE	CONSUMPTION
Production plant	Sepiolite consumption
	Generation of fluorescent tube waste
	Generation of electrical and electronic equipment waste
	Generation of oil filter waste
	Generation of contaminated material waste
	Generation of contaminated empty plastic packaging waste
	Generation of contaminated empty metal packaging waste
	Generation of aerosol waste
	Generation of battery waste
	Generation of laboratory waste

However, there are other relevant environmental aspects with respect to EPC's operations. Therefore, the company is constantly vigilant to identify opportunities that contribute to containment and minimisation, such as:

Direct:

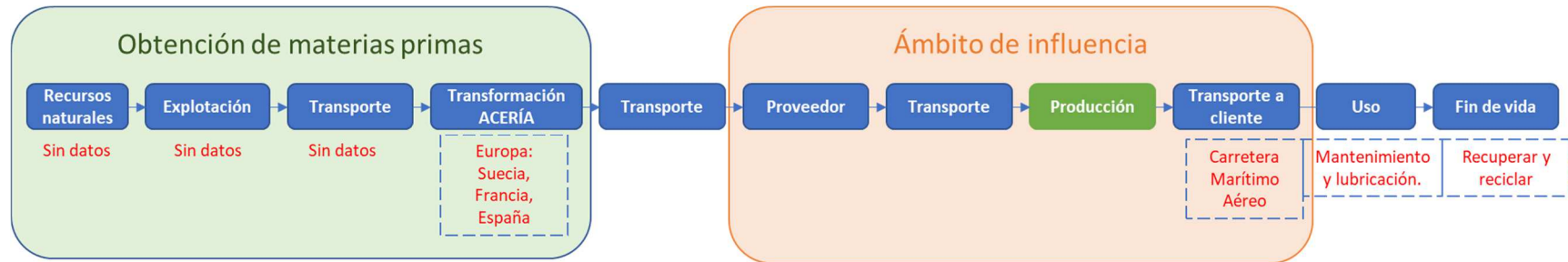
- Electricity consumption
- Water consumption
- Scrap metal waste generation

Indirect:

- Manufacture and transport of raw materials
- Transport of finished products

4.5.2. Indirect

Indirect environmental aspects from a life-cycle perspective are as follows:



The environmental aspects involved in each phase are detailed below:

Table 4. Indirect environmental aspects

A list of all indirect environmental aspects according to the life cycle is presented below. It is worth mentioning that none of them have been considered significant after the last evaluation.

SOURCE	INDIRECT ENVIRONMENTAL ASPECTS GENERATED OUTSIDE EPC PLANT, FROM A LIFE-CYCLE PERSPECTIVE
OBTAINING RAW MATERIALS: manufacture of raw and auxiliary materials.	Consumption of natural resources for the manufacture of raw materials (steel, forging, smelting, etc.)
	Electricity consumption
	Drinking water consumption
	Consumption of natural gas
	Non-hazardous waste generation: scrap metal
	Hazardous waste generation: metal containers, plastics, etc.
TRANSPORT OF RAW MATERIALS	Fuel consumption: diesel
	Generation of emissions from combustion.
PRODUCT USE AND END OF LIFE	Oil consumption
	Generation of used oil
	Generation of scrap metal
TRANSPORT OF PRODUCTS AND WASTE GENERATED IN EPC GE	Fuel consumption: diesel
	Generation of emissions from combustion
MANAGEMENT OF HAZARDOUS WASTE GENERATED IN EPC GE	Hazardous waste incinerated: Emissions to the atmosphere
	Recycled hazardous waste
MANAGEMENT OF NON-HAZARDOUS WASTE GENERATED IN EPC GE	Recycled non-hazardous waste
	Non-hazardous waste sent to the waste disposal site
EFFLUENT MANAGEMENT	Sewage discharge in treatment plants: generation of sludge.
GENERATION OF WASTE FROM USING THE PRODUCT	Scrap metal

INDIRECT ENVIRONMENTAL ASPECTS GENERATED IN EPC PLANTS
Client's own containers: Wood
Transport for products: Fuel consumption a generation of emissions
Spare parts for machinery. Scrap metal and electrical and electronic waste

4.5.3. Environmental aspects and impacts

Impacts on the environment are the direct cause of environmental aspects, and are related as shown in the table below:

Table 5. Environmental aspects and impacts

ENVIRONMENTAL ASPECTS		ENVIRONMENTAL IMPACTS
NATURE OF THE ASPECT	ASPECT LINKED TO EPC GE OPERATION	
USE OF RESOURCES	Water consumption	- Depletion of natural resources - Increased effluent
	Consumption of natural gas	- Depletion of natural resources - Increase in emissions to air
	Electricity consumption	- Increase in indirect atmospheric emissions
	Consumption of raw and auxiliary materials	- Depletion of natural resources
WASTE GENERATION	Hazardous waste generation	- Effect of human health from mishandling - Contamination of ground or water from spills and accidental discharge
	Non-hazardous waste generation	- Overfilled landfill sites
DISCHARGE INTO WATER	Sewage discharge	- Reduction of dissolved O₂ in the aquatic environment. - Contamination of water
ATMOSPHERIC EMISSIONS	Atmospheric emissions (SO ₂ , NO _x , particles)	- Effect of human health - Effects on forests - Acidification and reduction of oxygen in waters
	Emission of greenhouse gases (CO _{2e})	- Greenhouse effect

ENVIRONMENTAL ASPECTS		ENVIRONMENTAL IMPACTS
NATURE OF THE ASPECT	ASPECT LINKED TO EPC GE OPERATION	
NOISE	Environmental noise	- Noise pollution - Harmful effects on human health
LAND OCCUPATION	Usage of land	- Land occupation - Reduction in resources - Effect on flora and fauna

5. Environmental Performance

5.1 Basic indicators

EPC GE, S.L. has a centre with an advanced environmental management system. It uses internal benchmarking to guide its environmental performance. Its facilities have an ISO 50001 certified energy management system in addition to the system forming part of the EMAS. Detailed energy monitoring systems are in place and regularly reviewed.

5.1.1 Consumption

Table 6. Consumption raw materials

		Units	2021	2022	2023	2024
Raw material	Steel	t	994.33	1,172.12	1,139.48	976.94
	Pig-iron	t	1,446.08	1,495.94	1,306.81	1,060.31
	Forging	t	0	0	0	0
	TOTAL	t	2,440.41	2,668.05	2,446.29	2,037.25
Production	Total production	t	1,861.43	2,140.13	2,003.27	1,784.26
	TOTAL consumption of raw material/total production (*)	t/t	1.31	1.25	1.22	1.14
	Trend (Base 1)	-	1.00	0.95	0.93	0.87

**Indicator i1 of Decision 2021/2053*

Source: EPCGE, S.L.

During the period 2022–2024, the consumption of raw materials was maintained relatively stable in absolute terms, with a progressive downward trend. In 2024, the total consumption of raw material was 2037.25 tonnes, which represents a reduction of 16.8% with respect to the base year (2021). This reduction is even more significant when it is analysed against total production, with a raw material consumption ratio achieved per tonne produced of 1.14 t/t against 1.31 t/t recorded in 2021. The positive evolution of this indicator reflects a continuous improvement in efficiency of use of material resources.

The consumption of forging material this year has been nil.

Table 7. Consumption of auxiliary materials

	Units	2021	2022	2023	2024
Oil	t	28.48	32.36	26.38	28.67
Rust Preventive oil	t	10.00	8.80	7.50	7.30
Coolant	t	36.50	36.00	33.00	32.00
Hydrochloric acid	t	1.55	2.05	1.75	1.02
Nitric acid	t	1.35	1.90	1.55	0.75
Methanol	t	1.65	2.53	1.88	1.10

	Units	2021	2022	2023	2024
Cellulose powder	t	3.64	3.38	2.23	3.17
Quenching fluid	t	2.86	4.78	5.05	5.31
TOTAL	t	86.03	91.80	79.34	79.32
TOTAL consumption of auxiliary material/TOTAL production (*)	t / t TOTAL production	0.046	0.043	0.040	0.044
Trend (Base 1)	-	1.00	0.93	0.90	0.96

*Indicator i46 of Decision 2021/2053 and Benchmark of Excellence b17)

Source: EPCGE, S.L.

Auxiliary materials such as oils, coolants, acids and methanol perform an essential role in the proper functioning of manufacturing processes, principally in machining and surface treatment operations.

Oils and cutting fluids are mainly used as lubricants and coolants for machining processes.

Hydrochloric and nitric acids, together with methanol, are only used in the "Burn control" process during the manufacture of steel components.

In recent years, a significant downward trend has been observed in consumption, both in absolute terms and relative terms with respect to steel production:

	Units	2021	2022	2023	2024
Hydrochloric acid	t	1.550	2.05	1.75	1.02
Nitric acid	t	1.350	1.90	1.55	0.75
Methanol	t	1.650	2.53	1.88	1.10
TOTAL	t	4.550	6.478	5.175	2.87
TOTAL acid consumption / TOTAL STEEL production	t acid/ t TOTAL STEEL production	0.007	0.008	0.006	0.004
Trend (Base 1)	-	1.000	1.213	0.937	0.586
Consumption HCl/ t steel production	t HCl/ t TOTAL STEEL production	0.002	0.003	0.002	0.001
Trend (Base 1)	-	1.000	0.127	0.930	0.613
HNO3 consumption/ t Steel production	t HNO3/ t TOTAL STEEL production	0.002	0.002	0.002	0.001
Trend (Base 1)	-	1.000	1.200	0.946	0.515

	Units	2021	2022	2023	2024
Consumption Methanol/ Steel production t	t Methanol/ t TOTAL STEEL production	0.002	0.003	0.002	0.001
Trend (Base 1)	-	1.000	1.304	0.936	0.618

Source: EPCGE, S.L.

In the 2024 financial year, the total consumption of these products was 2.87 tonnes, which is a reduction of 44.5% with respect to 2023 and an accumulated reduction of 57% with respect to 2022.

The total consumption ratio of acids per ton of steel produced has been reduced from 0.008 t/t in 2022 to 0.004 t/t in 2024, which is a 51.4% improvement in usage efficiency.

In particular, hydrochloric acid has recorded a reduction of 41.7% with respect to 2023 and 50.2% with respect to the base year, while nitric acid has dropped 51.6% in the last year.

This positive evolution is principally attributed to the implementation of the **Barkhausen technology** in one of the HHP production lines since 2019. This technology has allowed the use of these products on that line to be completely eliminated, thus improving the sustainability of the process and reducing the risk associated with the use of hazardous substances.

As regards the consumption of coolants and industrial oils, this has remained stable since the installation of a smart automatic dosing system. This equipment, connected to the water mains and coolant supply, ensures a constant and precise mix that optimises the use of the emulsion.

The device includes an automatic dosing unit that regulates the proportion of the mix, which contributes to efficient control of consumption.

Furthermore, monthly quality analyses of the emulsion are carried out, which allows its useful life to be extended and its properties maintained in optimal usage conditions, which minimises waste and reduces the need for replacement.

Table 8. Consumption of containers and packaging

	Units	2021	2022	2023	2024
Plastic	t	6.42	7.41	6.55	6.15
Wood	t	18.62	14.37	11.20	15.59
Cardboard	t	36.93	22.08	38.42	25.85
Paper	t	0.75	0.27	0.11	0.08
Wood and cardboard	t	0.43	0.13	1.00	0.95
TOTAL	t	63.16	44.26	57.28	48.62

	Units	2021	2022	2023	2024
TOTAL containers / t production	t / t total production	0.034	0.021	0.029	0.027
Trend (Base 1)	-	1.00	0.61	0.84	0.80

Source: EPCGE, S.L.

During the 2024 financial year, the total consumption of packaging has reduced both in absolute and relative terms with respect to the production volume. In total, 48.62 tonnes of packaging materials was used, which is a reduction of 15.1% with respect to the previous year (2023). The ratio of consumption per tonne produced has also improved, from 0.029 t/t in 2023 to 0.027 t/t in 2024, which shows an improvement in the efficiency of use of packaging materials.

In specific terms:

- The consumption of **plastic** has continued its downward trend, with a reduction of 6.1% with respect to 2023.
- The consumption of **cardboard**, in spite of its volatility between years, has reduced by 32.7% in 2023.
- The combined **wood and cardboard** category have been stabilised with respect to the previous year.
- The use of **paper** for packaging continues to go down to minimal values (0.08 t), which is a result the progressive change to more sustainable alternatives or to its removal from certain logistical processes.

It should be pointed out that although EPC has actively promoted the reduction and optimisation of the use of packaging, by prioritising the use of reusable wooden boxes and streamlining the consumption of cardboard, the standardisation of requirements by certain customers limits the possibility of applying additional reduction measures in many cases.

The demand for specific packaging formats, as well as specific materials for the transport and delivery of the product, partly restricts the improvement strategy in this aspect.

Nevertheless, the results obtained in 2024 reflect a positive evolution, consistent with the principles of efficiency in the use of resources and prevention of waste established in the EMAS regulation and standard ISO 14001.

A. POWER CONSUMPTION

Table 9. Power consumption

	Units	2021	2022	2023	2024
Electrical energy	MWh	3,985.74	4,175.17	3,954.00	3,825.44
Electricity consumption / t TOTAL production (*)	MWh / t TOTAL production	2.14	1.95	1.97	2.14
Trend (Base 1)	-	1.00	0.91	0.92	1

*Indicator i3 of Decision 2021/2053

Source: EPCGE, S.L.

During the 2024 financial year, the total consumption of electrical energy was 3825.44 MWh, which is a slight reduction with respect to 2023 (-3.25%). However, on analysing the indicator (i3) for specific electrical consumption per tonne produced, an

increase of up to 2.14 MWh/t is observed, the same as the value recorded in the base year (2021). This evolution is explained by the reduction of the production volume, which increases the relative weight of the fixed energy consumption or consumption independent of the production load (lighting, climate control, auxiliary systems, etc.).

Despite this upturn in the specific indicator, the overall electrical consumption is maintained within the historical reference values and under control. A thorough monitoring of the energy performance is continuing to be carried out through the certified Energy Management System in accordance with standard ISO 50001, as well as by means of the process monitoring tool, which allows consumption to be analysed in a disaggregated way (indicator i12 and parameter b6 of the 2021/2053/EU Decision).

It should be pointed out as a positive environmental aspect that, since January 2024, 100% of electrical energy consumed in the facilities comes from renewable sources, which directly contributes to the reduction of indirect emissions of greenhouse gases (scope 2). This aspect is linked to indicator i40 and excellence parameter b14 defined in the EMAS 2021/2053 Decision.

In parallel, the planned actions have been completed for the improvement of efficiency in lighting, through the implementation of zonal lighting and smart lighting control strategies in 100% of the production and office areas, which reinforces a commitment to energy efficiency and operational sustainability.

Table 10. Luminous Efficiency

	Units	2023	2024
Average luminous efficiency in the whole plant (*)	lm/W	100	100

*Indicator i33 of Decision 2021/2053

Source: EPCGE, S.L.

The average luminous efficiency of the light sources in the plant is 100 lm/W; the same model is available throughout the plant.

As regards the compressed air systems, there are 2 variable compressors whose operation is one of the main auxiliary energy consumers of the industrial process.

Although currently there is no real-time data on the generated compressed air volume (m³), the associated electrical consumption is monitored as a direct efficiency indicator.

Table 11. Power Consumption Compressed Air System

	Units	2021	2022	2023	2024
Power consumption of the compressed air system	MWh	638.306	638.522	587.834	585.21

Source: EPCGE, S.L.

During the 2024 financial year, the electrical consumption of the compressed air system was 585.21 MWh, which is a reduction of 8.3% with respect to the base year, 2021, and a slight improvement with respect to the previous year (-0.4 %).

Within the framework of the Energy Management System implemented in accordance with standard ISO 50001, actions are being developed to improve the energy efficiency of the compression system. These include:

- Evaluation of the specific performance of each compressor.
- Analysis of possible losses in the compressed air distribution network.
- Review of the no-load demand or demand during operational inactivity.
- Optimisation of the start-up sequence.

The aim is to reduce the associated energy consumption without compromising the operational reliability of the system, in order to improve the relationship between energy consumed and air generated.

B. CONSUMPTION OF NATURAL GAS

Table 12. Consumption of Natural Gas

	Units	2021	2022	2023	2024
Natural gas	MWh	596.67	773.68	725.81	674.76
Natural gas consumption / t TOTAL production	MWh / t TOTAL production	0.321	0.362	0.362	0.378
Trend (Base 1)	-	1.00	1.13	1.13	1.18

Source: EPCGE, S.L.

Natural gas is solely used for the heating system of the facilities, which means its consumption is seasonal and concentrated in the winter months. During the 2024 financial year, the total consumption was 674.76 MWh, which is a 7% reduction with respect to 2023 and 12.8% when compared with the maximum value recorded in 2022.

However, the specific consumption with respect to total production has slightly increased to 0.378 MWh/t, due to the reduction of production volume during this financial year. This is an increase of 18% with respect to the base value (2021), although it does not indicate a loss of efficiency, given that thermal consumption is principally determined by the annual weather conditions and not by the production load.

It is considered that the consumption has stabilised at efficient values, as a result of the control measures implemented in previous years. In particular, the installation of programmable thermostats in the workshop areas allows smart and zoned control of the temperature, with the adjustment of the heating levels to the actual usage conditions and presence in each space, which contributes to preventing unnecessary consumption.

Within the framework of the Energy Management system in accordance with the ISO 50001 standard, the energy performance of the thermal systems is monitored and the implementation of additional measures is continuously assessed, such as improvement in thermal insulation and incorporation of more efficient or lower environmental impact technologies in future renovations (e.g. air source heat pump, heat recovery or renewable resources).

C. ENERGY CONSUMPTION

Table 13. Energy consumption

	Units	2021	2022	2023	2024
Electrical energy	MWh	3,985.74	4,175.17	3,954.00	3,825.44
Natural gas	MWh	596.70	773.68	725.81	674.76
Total Energy	MWh	4,582.44	4,948.85	4,679.81	4,500.21
Energy consumption / t TOTAL production (*)	MWh / t TOTAL production	2.46	2.31	2.34	2.52
Trend (Base 1)	-	1.00	0.94	0.95	1.02

*Indicator i11 of Decision 2021/2053

Source: EPCGE, S.L.

The total energy consumption in the facility, which includes the consumption of electricity and natural gas, was 4500.21 MWh in 2024, which is a slight reduction 3.8% with respect to 2023. In absolute terms, this value confirms a general stabilisation trend and improvement with respect to the peak recorded in 2022.

Nevertheless, on analysing the specific indicator for energy consumption per tonne of production (i11 of Decision 2021/2053/EU), a slight increase is observed up to 2.52 MWh/t, against 2.34 MWh/t of the previous year. This evolution is explained by the reduction of the total production volume, which increases the relative weight of fixed energy consumption or consumption not highly dependent on production activity (lighting, climate control, compressed air, etc.).

Within the framework of the Energy Management System implemented in accordance with ISO 50001, work will continue on energy efficiency improvement by:

- Disaggregated monitoring of the consumption by process.
- Optimisation of the performance of energy intensive equipment (compressed air, lighting, heating).
- Progressive replacement by more efficient technologies.

It should also be pointed out that 100% of the electrical energy consumed in 2024 came from renewable resources, which reinforces the commitment of the organisation to decarbonisation and energy sustainability (linked to indicator i40 and parameter b14 of Decision 2021/2053/EU).

Table 14. Energy Source

	Units	2023	2024
Power consumption of the centre coming from renewable sources	% consumption	84.5%	85%
Fossil fuel power consumption per functional unit	MWh/t production	0.362	0.378

Source: EPCGE, S.L.

During the 2024 financial year, 85% of the total energy consumed in the centre came from renewable sources, thus consolidating a positive trend with respect to the previous year (84.5 % in 2023). This value reflects that 100% of the electrical energy acquired has the renewable guarantee of origin (GO), thus meeting the energy sustainability and decarbonisation commitments established in the framework of the Energy Management System in accordance with ISO 50001.

The remaining 15% of the energy consumption comes from fossil fuels, which is solely due to the use of natural gas for heating during the cold months, as no liquid fuels or other types of fossil fuels are used in the operations.

In relative terms, the fossil energy consumption per functional unit (total production) was 0.378 MWh/t, against 0.362 MWh/t recorded in 2023, which is a slight increase due to the reduction of production volume, and not to an increase of the absolute consumption.

This section corresponds to the indicators of Decision 2021/2053/EU, notable among which are:

- **i40**: Percentage of renewable energy to total consumption → 85 % in 2024.
- **i39** (if used): Dependence on fossil fuels → solely limited to natural gas for heating.

The organisation maintains its commitment to evaluating more sustainable energy alternatives, such as the possible electrification of thermal systems, the incorporation of air source heat pumps or improvements in the installation of climate-controlled spaces, with the aim of continuing to reduce the proportion of energy consumption from fossil fuels in the coming years.

D. WATER CONSUMPTION

Table 15. Water Consumption

	Units	2021	2022	2023	2024
Water	m ³	3,404	4,605	5,405	3,699
Water consumption / t TOTAL production (*)	m³ / t TOTAL production	1.83	2.15	2.70	2.07
Trend (Base 1)	-	1.00	1.18	1.48	1.13

**Indicator I5) of Decision 2021/2053*

Source: EPCGE, S.L.

During the 2024 financial year, the total water consumption was 3699 m³, which is a reduction of 31.6% with respect to the previous year (5405 m³ in 2023) and a recovery to the average values observed in previous years.

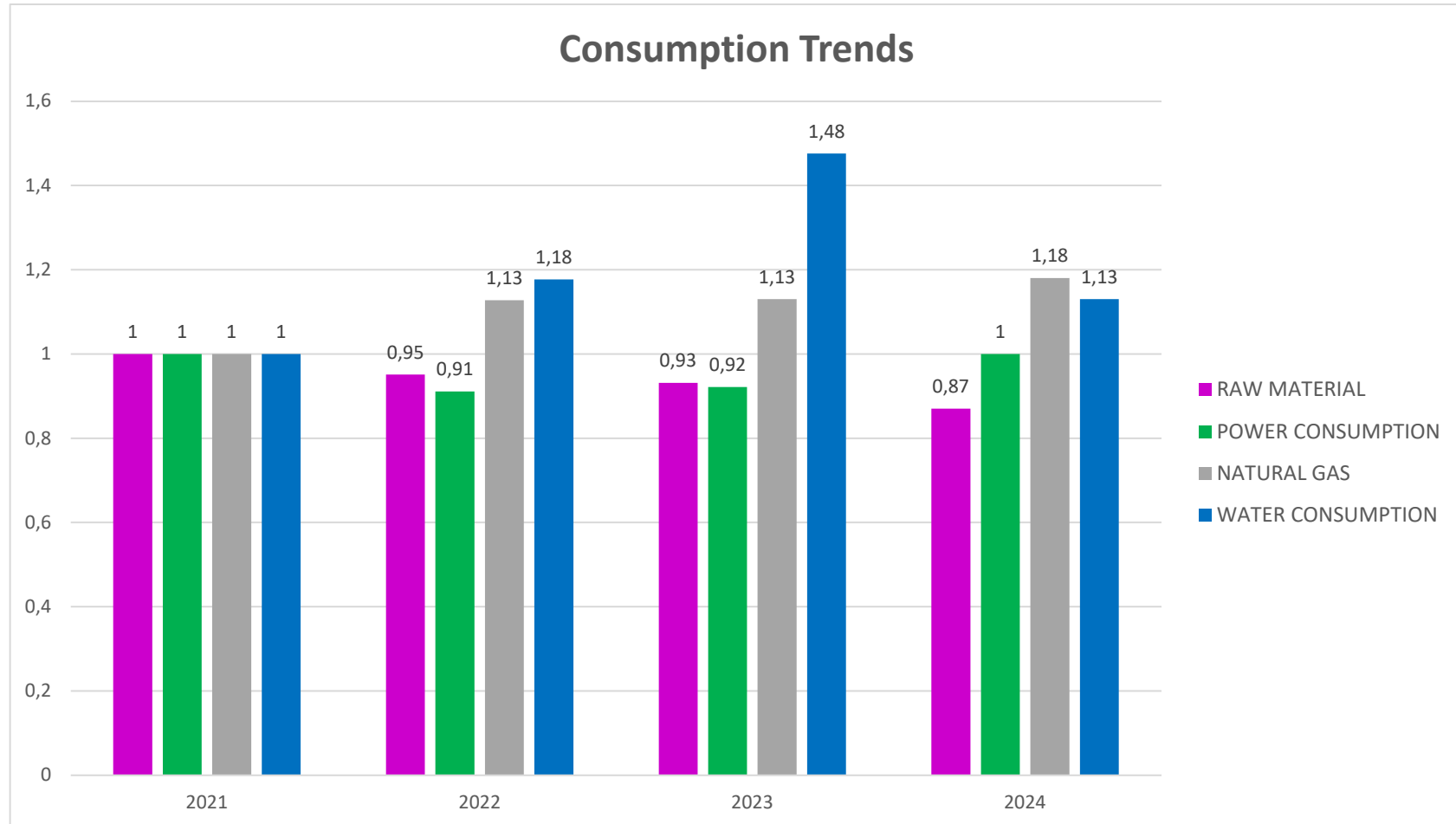
The specific consumption of water per production ton (indicator i5 of Decision 2021/2053/EU) was 2.07 m³/t, which is a significant improvement against the value of 2.70 m³/t recorded in 2023. In terms of trend, this value is a reduction of 13% with respect to the base year (2022). This drop is a result of the measures adopted as a response to abnormally high consumption observed in the final quarters of 2022 in 2023, which were not justified by increases of activity or external conditions.

The actions implemented included:

- Request for verification from the water consortium, which certified the correct calibration and operation of the existing meters.
- Installation of two additional meters in the branching of the main supply, with the aim of breaking down consumption between offices, changing rooms and production areas.
- Monthly monitoring of consumption by areas.

These actions allowed the identification of the progressive normalisation of consumption from the second quarter of 2024, with values that returned to historic levels during the last quarter of the year.





5.1.2 Atmospheric emissions

A. DIRECT EMISSIONS

EPC GE, S.L. has natural gas boilers used for heating. The APCA code (by its Spanish initials that stands for Activities with Air-polluting Potential) for these is 02 01 03 03 and they are currently not included in the Resolution as a potential air pollutant.

The metal cutter (saw using coolant as a refrigerant) and the extractor hood in the laboratory are not included in Annex I of RD 100/2011 for potential air pollutants.

During the 2023 financial year, the latest resolution of the Public Environmental Control Administration (APCA) was received, which legalised the incorporation of the two new atmospheric emission sources, corresponding to the intakes of lines HHP1 and HHP2. This modification has been classified as non-substantial, in compliance with that set out in the applicable environmental regulation.

Both sources were included in the inventory of authorised emissions and are subject to the established environmental monitoring programmes. The first regulatory measurement of these sources was carried out during the 2025 financial year. The IKS platform report closed in 2024 will be transferred to Ingurunet.

The company is maintaining its commitment to continuous improvement in the control of atmospheric emissions, as well as to strict compliance with the conditions established in its current environmental authorisation.

On an annual basis, some refrigerant gas leaks on existing air conditioners are detected during leakage checks carried out as part of preventive and corrective maintenance.

Table 16. Estimated direct emissions from refrigerant gas

	Units	2021	2022	2023	2024
CO₂e	t CO ₂ e	9.09	13.92	41.62	25.29
Total emissions / t production	t / t production	0.005	0.007	0.021	0.014
Trend (Base 1)	-	1.00	1.27	3.76	2.90

Source: EPCGE, S.L.

The direct emissions from refrigerant gas leaks are estimated according to the type of gas used, its quantity and its corresponding Global Warming Potential (GWP), in accordance with that established in Regulation (EU) No 517/2014 on fluorinated gases.

These emissions are subject to control by means of a preventive and corrective maintenance plan for the refrigeration installations, in accordance with the requirements of the Regulations for Thermal Installations in Buildings (RITE) and of the Safety Regulations for Refrigeration Installations (RSIF). Nevertheless, the interannual variability of the indicator is principally due to:

- The nature of the leaked gas (R-410A, R-32, etc.), whose GWP can vary significantly.
- The total amount of refrigerant replaced or recovered during the year.
- The existence of specific incidents in certain climate control equipment.

In the 2024 financial year, the estimated emissions due to this cause were 25.29 t CO₂e, which represents an improvement with respect to the previous year (–39,2%). The relative value has also reduced to 0.014 t CO₂e/t of production, which remains within the historic values and shows a downward trend with respect to 2023, a year in which a significant leak occurred in one of the main pieces of equipment.

The organisation is continuing to reinforce the control and monitoring measures, including the periodic leak-tightness verification and progressive replacement by equipment with gases of lower GWP, in line with the greenhouse gas emission reduction objectives.

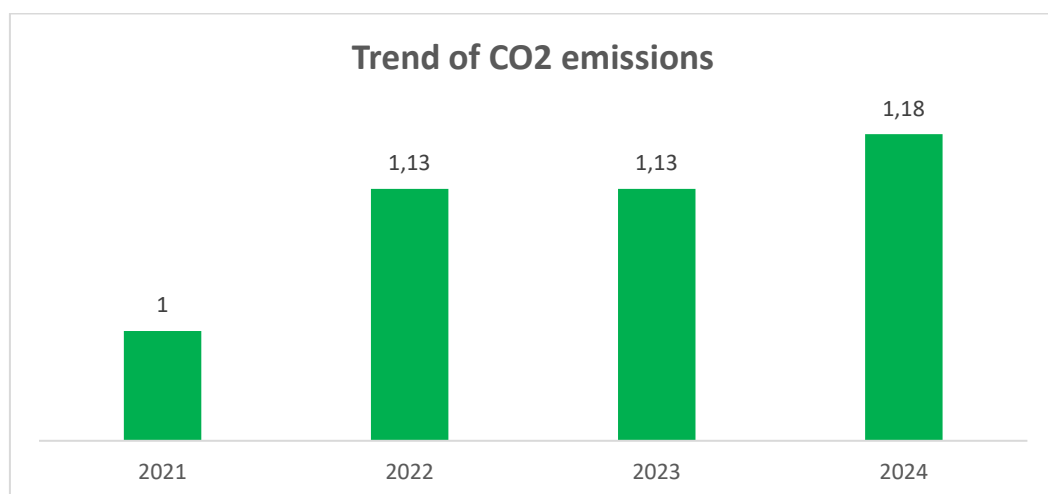
The company annually carries out a systematic leak analysis in all the equipment that contains refrigerant gases. This procedure allows the early detection of possible losses, after which they can be immediately repaired by the internal maintenance team, in compliance with the requirements of the Safety Regulations for Refrigerant Installations (RSIF).

Table 17. Estimated direct emissions from natural gas consumption

	Units	2021	2022	2023	2024
CO₂	t CO ₂ e	108.59	140.81	132.10	122.81
CH₄	t CO ₂ e	0.27	0.35	0.32	0.30
N₂O	t CO ₂ e	0.00	0.00	0.00	0.00
Total	t CO ₂ e	108.86	141.16	132.42	123.11
Total emissions / t production	t / t production	0.058	0.066	0.066	0.069
Trend (Base 1)	-	1.00	1.13	1.13	1.18

Source: In-house compilation based on emission factors according to:

- MITERD Calculator, 2024
- IPCC - AR 6



Within the framework of the "Subsidies for innovation in the circular economy 2022", EPC has actively participated in the regional project "Decarbonisation in the SMEs of Debarrena", promoted by the Debegesa Development Agency, together with other companies in the area.

The grant application was submitted on 18 November 2022, and although the decision was notified after a certain delay, it was finally favourable and the finance was granted for the project on 23 May 2023.

During the 2023 financial year, a calculation was made for the Carbon Footprint of the organisation (scopes 1 and 2), taking financial year 2022 as the base year, in accordance with the principles and requirements included in standard UNE-EN ISO 14064-1:2019 and the GHG Protocol. This initiative comes within the commitment of the organisation to sustainability, environmental transparency and progressive decarbonisation of its activities.

In the financial year 2023, the calculation of the carbon footprint of scope 2 was carried out again, with the corresponding official seal awaiting issue by the Registry of the Ministry for Ecological Transition and Demographic Challenge (MITERD) due to administrative delays caused by a backlog of applications.

EPC is maintaining its commitment to continue making progress in the coming financial years towards a more complete evaluation that includes scope 3 (indirect emissions of the value chain), with the aim of:

- Obtaining an independent external verification,
- Establishing effective reduction and compensation measures,
- And moving towards a low carbon model.

At the same time, work has started on the calculation of the product's carbon footprint, with the analysis structured by product families, as a prior step to its environmental statement and future incorporation into life-cycle analysis (LCA) tools.



5.1.3 Waste

A. HAZARDOUS WASTE

Table 18. Hazardous Waste Generated

	Units	2021	2022	2023	2024
Metal containers (contaminated with hazardous substances)	kg	15	70	0	45
Plastic containers (contaminated with hazardous substances)	kg	6,340	1,060	160	340
Coolant	kg	35,280	61,650	111,000	68,420
Grinding sludge	kg	287,040	299,830	283,560	256,030
Contaminated material	kg	2,100	8,380	1,920	2,030
Oil and coolant filters	kg	115	180	50	90
Office equipment	kg	900	540	0	700
Grinding burn coolant lubricant	kg	107,720	152,080	20,000	22,460
Aerosols	kg	11	40	10	20
Fluorescent tubes and bulbs containing mercury	kg	56	27	0	15
Batteries and used batteries	kg	20	1.49	2.07	30
Laboratory waste	kg	0	5	0	5
TOTAL	kg	439,597	523,863	416,702	350,185
HW GENERATED / t PRODUCTION (*)	kg HW / t production	236.16	244.78	208.01	196.26
Trend (Base 1)	-	1.00	1.04	0.88	0.83

*Indicator i1 of Decision 2021/2053
Source: EPCGE, S.L.

	Units	2021	2022	2023	2024
Coolant	kg	35,280	61,650	111,000	68,420
Grinding burn coolant lubricant	kg	107,720	152,080	20,000	22,460
TOTAL	kg	143,000	213,730	131,000	90,880
Coolant + Burn Control Liquid / t TOTAL PRODUCTION (*)	kg HW / t TOTAL production	209.28	99.87	65.39	50.93
Trend (Base 1)	-	1.00	1.30	0.85	0.66

*Indicator i14 and benchmark of excellence b7) of Decision 2021/2053

Source: EPCGE, S.L.

During the 2024 financial year, EPC has continued with the reduction and optimisation strategy in the management of hazardous waste (HW), with the consolidation of the favourable trend initiated in previous years and has notably reduced the coolant, grinding sludge and burn control liquid.

As an applied technological improvement, it is important to indicate that one of the key advances has been the implementation of a large capacity evaporator, which allows:

- The treatment of hazardous and non-hazardous liquid wastes.
- The generation of reusable distilled water in internal processes such as induction quenching.
- The promotion of waste self-management within the plant.

This system has contributed both to the minimisation of waste sent to an external manager and efficiency in the use of water resources, with the integration of waste and energy management within the circular economy approach.

B. NON-HAZARDOUS WASTE

Table 19. Non-Hazardous Waste Generated

	Units	2021	2022	2023	2024
Scrap metal and tips	t	148.77	160.44	138.80	141.96
Metal chips	t	348.39	391.20	398.16	343.52
Wood	t	52.19	97.11	129.80	85.79
MIXES: Paper, cardboard and plastic	t	13.02	21.34	0.00	0
Plastic	t	0.00	2.84	8.28	10.28
Toner	t	0.008	0	0	0
Wheels and abrasives	t	0	6.12	8.36	5.66
TOTAL	t	562.38	679.05	683.40	587.21
NHW GENERATED / t PRODUCTION (*)	t NHW / t production	0.30	0.32	0.34	0.33
Trend (Base 1)	-	1.00	1.05	1.13	1.09

*Indicator i1 of Decision 2021/2053.

Source: EPCGE, S.L.

During the 2024 financial year, EPC has continued making progress in the improvement of the management of non-hazardous waste (NHW), in line with the efficiency and environmental sustainability objectives established in its management system.

According to Indicator i1 of Decision 2021/2053, the generation of non-hazardous waste per tonne of production is maintained within controlled values, with a slight improvement with respect to the previous year:

- NHW generated put tonne of total production:
 - o 2023: 0.34 t/t
 - o 2024: 0.33 t/t
 - o Accumulated trend: Base 1 → 1.09

This represents a reduction of 3.5% in the generation of non-hazardous waste in absolute terms, the total volume generated in 2024 was 587.21 tonnes, against 683.40 tonnes the previous year.

Evolution by Types of Waste

- Wood: Significant reduction of 34% with respect to 2023 (from 129.80 t to 85.79 t), thanks to improvement in the use of packaging and greater internal re-use.
- Metal chips: Slight drop after two consecutive years of increase.
 - o 2023: 398.16 t
 - o 2024: 343.52 t (↓ 14%)
- Wheels and abrasives: They were also notably reduced, from 8.36 t to 5.66 t in 2024.

- Segregated plastics: The in-plant segregation system, started in 2022, continued, which allows direct traceability and specific quantification of plastic waste generated. In 2024, 10.28 tonnes were segregated, thus improving the management and recovery of the waste against previous years, when it was mixed with other waste at the manager's facilities.

Implemented Improvements

- Segregation and characterisations of waste in the plant, which allowed individual monitoring of each fraction and facilitated continuous improvement in its management.
- Collaboration with authorised managers in order to ensure adequate recovery or final elimination of all the generated waste.
- Promotion of the reuse of materials, especially wooden packaging, in order to reduce generation at origin.

The overall strategy has allowed the volume of generated non-hazardous waste to be contained, in spite of variations in the production processes, while maintaining a focus on continuous improvement, traceability and recovery of waste in accordance with the principles of the circular economy.

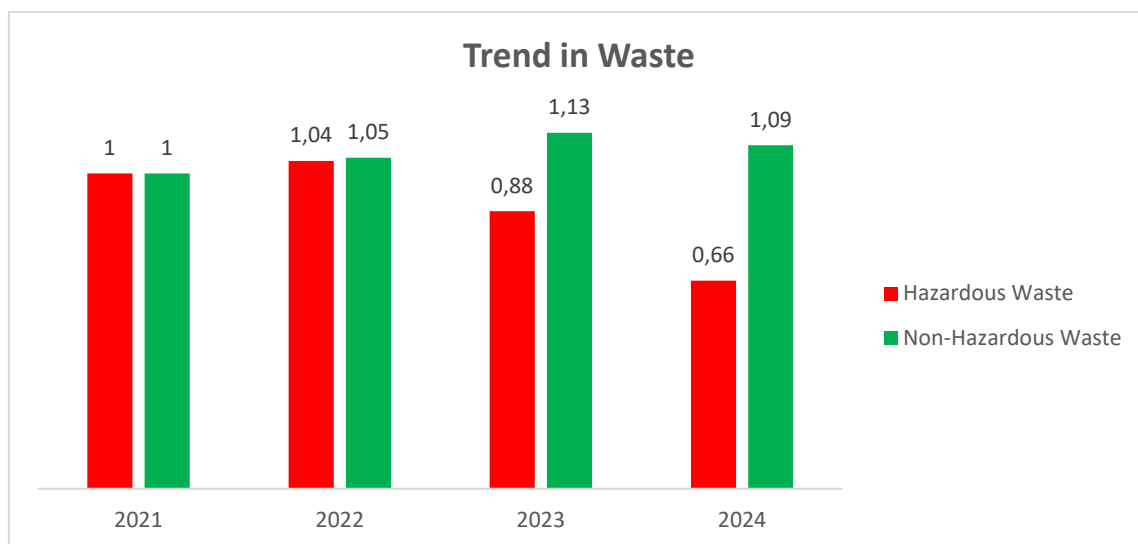


Table 20. Generated Waste Containers

	Units	2023	2024
Generation of packaging waste (plastic and wood)	t	138.08	96.07
Packaging generated / t production (*)	t NHW / t production	0.07	0.05

*Indicator i10 of Decision 2021/2053.

Source: EPCGE, S.L.

5.1.4 Noise

In June 2014, EPC GE S.L. hired APPLUS to take noise measurements in accordance with specifications in the company's business licence; max. 60 dB (A) in adjacent industrial operations, regardless of municipal regulations.

The range of results was between 49 and 53 dB(A), fully meeting requirements, and therefore no action was needed to reduce the level of ambient noise.

Since the last measurement report on outdoor noise, no modifications to facilities and processes have been done that could affect the impact of environmental noise.

5.1.5 Biodiversity

EPC GE S.L does not have facilities or areas dedicated to the conservation or restoration of nature or to promoting biodiversity, either inside or outside the organisation.

The premises are located in an industrial estate and as such it is not considered a sensitive area, and no biodiversity indicators beyond land use are calculated.

The data on land use are given below.

Table 21. Land use

	Units	2021	2022	2023	2024
Constructed area	m ²	6,017.44	6,017.44	6,017.44	6,017.44
Total sealed area	m ²	10,400.00	10,400.00	10,400.00	10,400.00
Total area of the centre (plot)	m ²	10,400.00	10,400.00	10,400.00	10,400.00
Total area outside the centre	m ²	0	0	0	0
Built-up area/ t production	m ² / t production	3.23	2.81	3.00	3.37
Trend (Base 1)	-	1.00	0.87	0.93	1.04

Source: EPCGE, S.L.

5.2 Other indicators of environmental performance

Within its environmental management system, EPC GE S.L. has procedures for measuring and monitoring non-conformities, corrective and preventive actions, implementing environmental audits and training given to several members of the company.

The internal audit for the environmental management system took place in June 2024, with a comprehensive review of the documentation created and implemented including the previous EMAS Statement.

After analysing the sectoral reference document on best environmental management practices, environmental performance indicators and benchmarks of excellence for the metal product manufacturing sector (EU Decision 2021/2053), the company plans to continue improving the monitoring of some indicators, such as those related to the annual control of chemical products (comparative parameter b7) and the indicator of coolant consumption (cooling lubricant according to indicator i47), although it should be noted that EPC has already implemented a system for extending the useful life of coolant through additives and controlled dosage.

Below are some indicators of interest relating to Decision (EU) 2019/62 and Decision (EU) 2021/2053 that have not been reported in the previous sections:

Table 22. Other indicators of environmental performance

	Units	2023	2024
Use of internal or external benchmarking to guide environmental performance	Y/N	YES (Internal)	YES (Internal)
Installations with detailed energy monitoring systems	% facilities	100%	100%
Facilities with an ISO 50001 certified energy management system or integrated in EMAS	% facilities	100%	100%
Carrying out periodic system checks, automation, repair, maintenance and actions	% plants	100%	100%
Fossil fuel power consumption per functional unit	%	16%	15%
Improving the location and energy efficiency of lighting	% of lighting zones in a plant	100%	100%
Implementation of areas with independent, individual lighting	% of lighting zones in a plant	100%	100%
Waste sent to specific waste flows, including recycling, energy recovery and landfilling	% of total waste	100%	100%
Establishment and implementation of a comprehensive waste strategy with improvement and monitoring targets	Y/N	Yes	Yes
Plants with advanced waste management plans in place	No. of plants	1	1
Plants that monitor water use	%	100%	100%

6 Legal environmental requirements and degree of compliance

EPC GE S.L. complies with all applicable legal requirements, among which are the following principal permits:

- Business Licence from the Eibar town council, dated 16/06/1998.
- Permit to discharge sewage and rainwater from the Gipuzkoako Ur Kontsortzioa (Water Board Gipuzkoa), updated on 16/10/2024.
- HW Producer permit of 1/10/2009, updated and extended on 04/07/2014 by the Basque government's Dept. of the Environment and Land Planning.
- Modification of the APCA (Potentially Atmosphere-Polluting Activities) permit of 08/05/2023.

EPC GE S.L. has identified and assessed the legal environmental requirements, enabling the company to know which ones applies to it, and the degree of compliance. In addition, the company uses the ECONET application, which provides users with updated information on new and projected regulations at all levels (EU, national, autonomous community, municipal, etc.).

In 2024, the report on operations for loading, unloading and transporting hazardous goods was submitted to the public administration, in compliance with obligations for environmental communication.

In 2024, registration in the CBAM registry was finalised to report on the purchase of imported steel.

7 Interrelationship with interested parties

EPC GE, S.L. informs all its interest groups on relevant aspects and activities in the environmental field through this report.

The following stakeholders have been identified by EPC GE S.L.:

- Clients
- Company staff
- Suppliers
- Owners and investors
- Institutions
- The public as a whole
- Competitors
- Plants of the group

All employees can take part in improving the company's environmental performance, by contributing suggestions or actions for improvement directly to Quality and Environment Management, or through a supervisor. Suggestions are analysed for possible implementation. In 2024, this survey was conducted in January and September, and no suggestions were received regarding the implementation of good environmental practices and energy consumption.

In other years, suggestions were received such as switching off machines and pumps, as well as the possibility of installing solar panels or joining the industrial estate's energy community.

Furthermore, suggestions and improvement activities are also periodically collected, which are received from the meetings of the energy management committee.

Anyone interested can request information on the environment by writing to the following e-mail address: sgonzalez@epcge.com

No environmental complaints or claims were received in 2024.

In collaboration with some companies, customers, EPC continues to establish good practices to minimise the generation of containers and container waste by using returnable containers.

8 Environmental verification

The EMAS 2024 Environmental Statement, Revision 2, was validated in compliance with article 8 of Regulation 1221/2009 by LRQA España S.L.U., during verification of the Management System.

The validated statement is the Spanish statement, if any doubt, Spanish version is mandatory.