

Non- Financial Statement Reporting PrimaFrio Group 2022



Applicable Legislation

This Non-Financial Information Statement (hereinafter "NFRS") has been drawn up according to the requirements set forth by Act 11/2018 of 28 December 2018 on Non-Financial Reporting and Diversity, which was passed by the Congress of Deputies on 13 December 2018 and amends the Code of Commerce, the Consolidated Text of the Corporate Enterprises Act approved by Royal Legislative Decree 1/2010 of 2 July and Act 22/2015 of 20 July on the Auditing of Accounts on Non-Financial Reporting and Diversity Matters (resulting from Royal Decree Law 18/2017 of 24 November).

This NFRS covers the requirements arising from the entry into force of said Act in financial year 2018 and forms an integral part of the Primafrío Group's consolidated management report.

Reporting Framework

The standards of the Global Reporting Initiative Sustainability Reporting Guidelines (GRI Standards) have been taken into account in its preparation. Within this context, the Group aims to report through the NFRS on environmental, social and personnel topics, as well as on questions concerning human rights which are relevant for the Group in the performance of its own business activities. That is why this report has been prepared in accordance with the GRI Standards' core option. [GRI 102-45]

Assurance

The Management report's Non-Financial Reporting Statement has undergone an independent external review process. The independent assurance report, which includes the process' goals and scope as well the review procedures used and their conclusions, is attached here to as an appendix to this report. [GRI 102-56]

Scope of the report

The financial and non-financial data of the Primafrío Ibérica Group, S.L. (the parent company) and its subsidiaries (hereinafter the "Primafrío Group") presented in this report have been consolidated and refer to the activities carried out over the course of 2022. As a general rule, the Group publishes its report on an annual basis. [GRI 102-50] [GRI 102-51] [GRI 102-52]

Nonetheless, the information set out below should be taken into account in relation to financial year 2022:

- As stated in Note 1 of Primafrío Ibérica Group, S.L.'s consolidated report, the parent company was incorporated in financial year 2022 and the Primafrío Ibérica Group was created on 7 July 2022 as a result of the acquisition of the subsidiary Primafrío Corporación, S.A.U. In this regard, the Primafrío Ibérica Group then became the parent company of a pre-existing group in the context of a corporate reorganisation and 2022 was the first financial year in which the new Group prepared consolidated annual accounts since it was the year the parent company and therefore the Group were incorporated.
- That is why this report includes annual information of the pre-existing Group with a view to facilitating said information's comparability as well as information referring to the data of the period running from 1 July to 31 December 2022 as a result of the aforementioned corporate transaction and given that this report forms part of the management report of Primafrío Ibérica Group, S.L. and its subsidiaries. Nonetheless and as regards the principal policies, objectives and risks set out in this report, the Group considers that the information is uniform in the second half of 2022 when compared to the complete year. An explicit reference is therefore made in this report to the second half of 2022 to highlight necessary aspects related to said half-year or to identify certain quantitative information referring to said period.


The complete list of companies that comprised the Group at 31 December 2022 can be found in Appendix I of the Consolidated Annual Accounts

(see Note 2 of the consolidated annual accounts).

[GRI 102-45]

A materiality analysis (see Appendix II) was carried out to prepare this report and select its contents, taking into account all the Group's subsidiaries for materiality.

INDEX



Letter from the Executive Chairman
Primafrío Group
<u>History</u>
<u>Business Model</u>
<u>Logistics Centre</u>
<u>Logistics Sector</u>
<u>Corporate Strategy</u>
<u>ESG Policy</u>
Environment
Innovation
Human Team
Primafrío Foundation
Social Commitment

Letter from the Executive Chairman

[GRI 102-14]

We at the **Primafrío Group** —Europe's leading temperature-controlled logistics operator— remain committed to transparency, continuous improvement and integrity through our competitive strategic ESG policy, which encompasses sustainable and responsible management by integrating R&D and Innovation, CSR and efficient management.

We are a group of companies **committed to the environment, society and our employees, as well as to our customers**, to whom we offer the very best logistics solutions by meeting the highest quality, excellence, safety and reliability standards.

We also encourage active consultation and dialogue with our stakeholders in order to provide a response to the challenges society and the environment demand of us, as demonstrated by our endorsement of the United Nations Global Compact, through which we have reaffirmed our responsibility to the Ten Principles that are universally accepted in the areas of human rights, labour and environmental standards.

Over the course of recent years, we have carried out several projects and initiatives at the Primafrío Group geared at reducing our activity's CO₂ emissions and promoting the use of more environmentally-friendly energy sources. A good example of this is the recognition granted to us by ESG Risk Rating (devised by the firm Sustainalytics) as one of the 20 companies in the logistics industry having the best ESG rating anywhere in the world.

We have likewise reaffirmed our fulfilment of one of the most stringent environmental and sustainability standards through the **Ecological Fleet Accreditation** devised by AEGFA (Spanish Association of Automobile Fleet and Mobility Managers), in addition to executing a strict ESG policy.



José Esteban Conesa
CEO

Primafrío Group



We remain very closely **linked to Murcia**, where the fruit and vegetable sector plays a fundamental role and because it is our region of origin. That is why we are proud to contribute to its economic development by offering solutions to our era's social and technological challenges.

We continue to work with the **same enthusiasm as on the very first day**, aware that we have managed to become the **leading road haulage cold logistics company in our country and Europe** only through our own efforts and the trust we have earned from our customers.

The commitments we have made to innovation, our services' improvement and our employees' welfare have come to fruition with the inauguration of the Group's logistics centre and headquarters located in **Alhama de Murcia**.

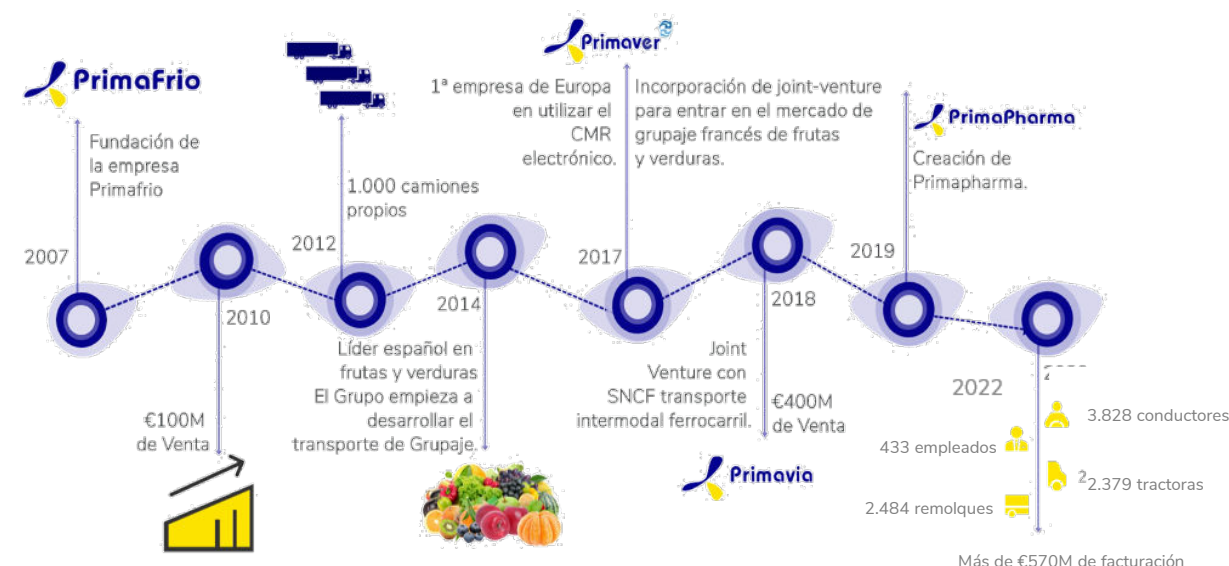
These facilities are equipped with the most modern information and communication systems, workshops, their own service station with 32 pumps, a laundry, a rest area for drivers, a restaurant, a games room and a cafeteria. With a surface area of over 350,000 m² (15,000 m² of which are a cross-docking warehouse) along with 106 loading and unloading bays, we have gained the flexibility and the logistical and operational capability needed to deal with all the current market's challenges and requirements

Primafrío Group

History

The Primafrío Group's history **began 60 years ago** with a very clear vocation in mind; namely, to become a global road haulage cold logistics company offering a comprehensive top-quality service to its customers.

Our **commitment to innovation and quality** has led us to improve on a day-to-day basis over all these years, both technologically and logistically, by establishing **strategic alliances with domestic and European partners** in order to achieve the most complete domestic and international coverage.



Business model

Our goal consists of continuing with our Mission and fully attaining our Vision by using all our strengths, meeting our environmental and social commitments and fulfilling our values in order to do so. [\[GRI 102-16\]](#)

VALUES

- **Commitment to our employees.** They are the Primafrío Group's main asset and the aim is to ensure that they all have equal opportunities in a healthy and motivating work environment.
- **Commitment to our customers.** They are provided a top-quality service through transparent, honest and long-lasting relationships, in which safety in all the processes and their satisfaction are our main priority.
- **Commitment to continuous improvement.** Prioritising innovation, research and the performance of actions which enhance our competitiveness.
- **Commitment to the environment.** Broaching and implementing effective actions and plans that go beyond complying with the legal requirements which apply.
- **Commitment to society.** Carrying out actions aimed at improving social cohesion and cultural strengthening in any places where the Primafrío Group has its facilities.
- **Commitment to transparency and integrity.** We at the Primafrío Group are fully committed to the principle of transparency, which underpins our daily logistics activities.



OUR STRENGTHS	OUR COMMITMENTS Materially Matrix	OUR RESULTS
Innovation - driven Business Strategy as a structuring element	Environment Pollution Circular Economy Climate change	Energy Intensity and energy consumption reduction per km 100% renewable electric power Plans to increase the environmental sustainability of operations
Team Specialised and engaged human team	Human Capital Employment Organisation of work Health and Safety Training Equality	5.963 employees in the year 89% are drivers 58% are permanent employees
Social Commitment Solutions designed to provide sustainable service Priimafrío Foundation	Social Commitment Consumer relation Management	Food Safety Procedures and certificates The overall customer satisfaction level was 9.26 in 2022

External Environment

- Economic Environment
- New Business models
- Regulations
- Environmental Policies
- Climate change

Stakeholders

- Shareholders
- Employees
- Customers
- Sociecity
- Suppliers

The Primafrío Group is a leading logistics operator specialised in cold fruit and vegetable logistics throughout Europe having points of origin in the Iberian Peninsula. The Logistics Group has incorporated new activities and technologies into its value chain that allow it to reduce and neutralise carbon emissions, as set out in our sustainability policy and the Group's decarbonisation plan.

[GRI 102-2] [GRI 102-4] [GRI 102-6]



Fruit, vegetables and food

We can ensure the right constant temperature throughout the journey, ensuring the cold chain and traceability thanks to thermographs and the state-of-the-art monitoring and communications technology installed in our fleet.



Pharmaceutical Products

The GDP certificate ensures that our quality system meets industry requirements in key aspects like training, safety or traceability.



Exports

We are a specialised logistics operator from the Iberian Peninsula and Morocco to any point in Europe. We currently operate in 27 countries and the inclusion of Morocco at the end of 2022 should be highlighted.



Domestic

If logistical needs are within the Iberian Peninsula, our Domestic Logistics professionals will be your allies by offering you a wide range of routes between Spain and Portugal.



Fruit and vegetable groupage

The domestic fruit and vegetable groupage service's consolidation and specialisation within the Iberian Peninsula and internationally in fruit and vegetable exports to Europe allows us to cover the demands of our customers and the current market



ADR

We have included responsible chemical industry product haulage in our activity through SQAS accreditation (Safety and Quality Assessment System).



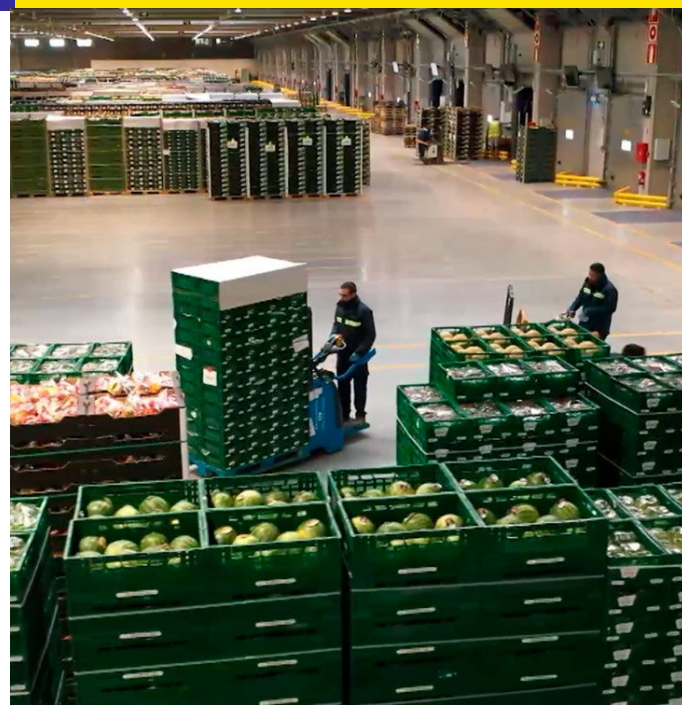
High-Value Products

We are aware of each product's requirements depending on their characteristics and take great care of every tiny detail



Imports

We transport all kinds of merchandise from any country in Europe to Spain or Portugal.



Customs management

In order to provide an overall service that meets the current market's demands, at the Primafrío Group we facilitate the management of the different customs procedures in the United Kingdom for both exports and imports through Primatransit.

Logistics Centres

The Primafrío Group has a total of five centres located throughout the Iberian Peninsula. These platforms are situated at key points and allow us to provide a rapid efficient service to our customers due to their more than 600,000 m², including their own mechanical workshops, cold warehouses, petrol stations and laundries.

[GRI 102-3]



Our Central Headquarters are located in Alhama de Murcia due to its highly strategic value for the fruit and vegetable production market, thereby ensuring a highly efficient logistics service for this kind of products to practically any European destination.

Logistics centres in the rest of Europe

An extensive network of logistics platforms located in strategic European locations allows the Primafrío Group to meet all its customers changing demands in a highly flexible way and offer the Group's services.

The Group has 16 logistics centres in France. It can also count on 36 cross-docking platforms in France as a result of its strategic alliances and five in Germany. Among other things, this allows the Primafrío Group to broaden its groupage services by providing the necessary operational flexibility and increase margins over time.



Logistics Industry

A change has come about in the international road haulage **logistics industry** in recent years which has had a direct effect on its activity. The reduction of haulage times, the inclusion of new routes and new services, and the demand for a top-quality service that ensures the cargo's proper condition at all times have been some of the main reasons that have contributed to the industry's increased professionalisation and thus to a demand for the digitisation of all processes.

According to the World Bank, logistics and haulage are an essential driver of a country's economic and social development since they generate job opportunities and improve its economic competitiveness. For the UN, they are also an essential industry which allows countries to undergo sustainable development. However, one of the most difficult environmental and social challenges of our time is managing the mobility of people and goods.

The haulage industry accounts for 27% of total greenhouse gas emissions in Spain and almost 40% of diffuse sector emissions. By means of transport, road haulage accounts for almost 91% of emissions, while the contribution made by other means of transport is rather minimal.



Presence in 26 European destinations

Corporate Estrategy

At the Primafrío Group we are working to improve our services, contribute to the development of the Region of Murcia and Spain as whole and become environmentally sustainable. We have devised our business strategy and growth plan by placing the onus on **innovation and sustainability** as structuring elements of all our activity.



In order to do so, we set up our own Research and Development Department (R&D) along with a Corporate Social Responsibility (CSR) and Quality Department in order to speed up our progress towards new technological models, enhance security across the entire logistics value chain (from harvest to end consumer) and provide qualified personnel for all processes to meet all quality requirements and reduce our activity's environmental impact.



Primafrío Group, the **leading European temperature controlled logistic** company.

Due to the variety of information sources that currently comprise our technology, we can now make real-time forecasts about the new challenges we have to face. This has led to increased productivity, efficiency and performance.

Aside from being a leading European firm in fruit and vegetable cold logistics, the Primafrío Group is a technology-based company, and proof of this is the close relationships that link us to numerous research centres, universities and technology companies around the world to generate and transfer knowledge. The Primafrío Group is the first company to lead the new calls issued by the European Commission.

Corporate Social Responsibility

Our **CSR Policy** is the key element to properly approach and bring together the circular economy, digitisation and sustainability through new techniques and processes which contribute to full decarbonisation, thus providing a clear response to the energy transition. The commitment we have made to inter-modality through Primavia is proof of this by integrating gas-powered lorries (LNG), adapting our entire fleet to the Euro VI regulation and using new energy sources, to mention but a few.

Moreover, advanced training and new programming tools have allowed us to further optimise resources, thus leading to a constant improvement in our emissions ratio per km travelled or per kW consumed at our facilities, which are self-sufficient in terms of energy and water capacity.

All these actions along with our endorsement of different initiatives like **Lean & Green** and **First Star** —aimed at reducing our emissions by 20% within five years—, the setting up of the new Region of Murcia Sectorial Green Hydrogen Association (**AHMUR**) and the support given to the Biodiversity Partnership Mesoamerica (**BPM**) are linked to our ecological transition. Encouraging the use of more sustainable energy sources, the logistics industry's decarbonisation and the neutralisation of our emissions are activities aligned with the Sustainable Development Goals (**SDGs**).

CIRCULAR ECONOMY

DIGITALIZATION

SUSTAINABILITY

Quality Policy

One of the Primafrío Group's undertakings is to ensure our company is safe, sustainable and can meet the most stringent quality standards. In addition, caring for and protecting the environment is a constant feature of our activity by promoting innovation and good practices to achieve this goal.

In order to do so, we are working on continuous improvement to obtain quality certificates and to implement and develop diverse actions and certifications.

- **ISO 9001:2015** certificate which certifies the development and implementation of a quality management system that can situate us at the forefront of the industry.

ISO 9001



- **ISO 14001:2015** certificate which certifies the development and implementation of an environmental management system in order to reduce pollution, waste and energy consumption at our Central Headquarters in Alhama de Murcia.

ISO 14001



- Good Distribution Practices **Certificate** for medicines for human use (GDP).

GDP

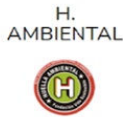


- Road Transport **Certificate** for food products at ambient or controlled temperature (IFS).

IFS



- We have additionally implemented an HACCP System (Hazard Analysis and Critical Control Point), which ensures maximum food logistics quality by controlling and analysing critical hazardous points.



- The company was granted ISO 50001:2011 certification, which certifies an efficient energy management system, and the ISO 27001:2017 information security certification in 2021.

ISO 27001



ISO 50001



- In 2022, SQAS accreditation was granted aimed at integrating into our activity responsible chemical product transport.



ESG Policy

The Primafrío Group's ESG Policy is based on the following principles:

Environmental, social and governance (ESG) principles are at the very heart of the Primafrío Group's strategy and are deemed of utmost importance within its activity and business model. Fulfilling these principles not only benefits our planet and society as a whole, but it also drives forward the Group's innovation and long-term growth.

Environmental

- ✓ Corporate policies related to biodiversity and its impact
- ✓ Monitoring environmental performance in the supply chain
- ✓ Self-sufficient facilities
- ✓ Energy efficiency
- ✓ Risks and opportunities due to climate change
- ✓ Renewable fuels and coolants
- ✓ Recycling processes

Social

- ✓ Personnel
- ✓ Human and labour rights
- ✓ Impacts on the community
- ✓ Data protection
- ✓ Impact of products and services
- ✓ Employee welfare
- ✓ Diversity and inclusion
- ✓ Impact on local and international communities

Corporate Governance

- ✓ Ethical standards
- ✓ Diversity
- ✓ Shareholding structure and commitment
- ✓ Political donations
- ✓ Structure, diversity and independence of the Board
- ✓ Performance-linked remuneration
- ✓ Accounting and auditing quality
- ✓ Combatting bribery and corruption

The Primafrío Group's goal is to become in a net-zero carbon emission organisation by 2030 (ahead of the EU's 2050 climate neutrality strategy) and an industry benchmark in ESG matters and sustainable logistics.

The Group has a track record of ongoing innovation and research dating back over 15 years which has led it to adopt a business model aimed achieving its activities' sustainability by limiting its impact on the environment and providing its customers with the best possible service while at the same time caring for its employees' welfare, its contribution to society's sustainable development and all its activities' transparency and integrity.

The Group aims to provide efficient solutions to the needs of controlled-temperature logistics by offering a high-quality, integrated, tailored and ecological service. At the same time, it intends to offer all its employees the opportunity to grow both personally and professionally within the Primafrío Group.

A clear example of the Group's commitment to ESG principles is its endorsement of the United Nations Global Compact and the alignment of its activities with Sustainable Development Goals (SDGs), as is its approval of an internal Sustainability Policy (see Section 3.3), not to mention other initiatives.

Risk Management model – ESG

Fulfilment of ESG principles is integrated into the Group's risk management system. An ongoing analysis is conducted of any risks arising from the environmental, social and governance issues that most affect the Group's activity (see Section 6), such as, for instance, quality management, food safety, climate change and polluting emissions, energy transition risks and talent drain, to mention but a few.

Fulfilment of these principles is reviewed on the basis of certain qualitative and quantitative metrics that measure the ESG impact of the Group's operations (e. g. on energy consumption, fuel consumption, water use, waste generated, GHG and non-GHG emissions and other environmental metrics). Furthermore, the impact of each project is assessed from an ESG standpoint to ensure it is aligned with the Group's business model.

Day-to-day responsibility for managing these ESG issues resides in the R&D and ESG Department, which is headed by Adrián Valverde and comprised of a team of over 20 professionals. The Group's employees and senior management are additionally given training in ESG principles, including topics like carbon footprint and environmental impact, climate and renewable energies, the circular economy, sustainable infrastructures and digitisation.

Essential Cornerstones

Given the importance of ESG principles in its activity and corporate strategy, the Group has decided to focus its goals on **seven essential cornerstones** through a variety of present and future initiatives, which are summarised below and will be set out throughout the contents this NFRS:

Minimising emissions

Emissions the Group generates are its main impact on the environment. That is why it is committed to reducing its carbon footprint until it becomes a net-zero carbon emission organisation through a variety of different initiatives like:



Membership of the Biodiversity Partnership Mesoamerica (BPM) management board.



Collaboration with the National Hydrogen Centre, along with promoting national and international green hydrogen projects in conjunction with IBEX 35 companies.



Partnerships with several partners like Michelin to reduce the lorry fleet's CO2 emissions.



Driving forward and implementing new transport formulas such as intermodal transport, combining road, rail, sea and air transport, optimising resources and reducing CO2 emissions.



Founder-member of the first Region of Murcia Sectorial Green Hydrogen Association (AHMUR).



First AECOC Lean & Green Star granted.



Ecological Fleet Accreditation granted by the AEGFA in conjunction with the IDAE.



Environmental Management System Optimisation

Development of a comprehensive programme that pursues continuous improvement and optimisation of environmental initiatives, while fulfilling all legal requirements (ISO 9001, 14001, 27001 and 50001 certifications).

Protecting water and reducing electricity demand

The Group aims to reduce its demand for electricity and the GHG emissions arising from it, which is materialised in several initiatives:

Acquisition of electric power supplies from fully renewable sources that have been granted Guarantee of Origin (GO) certificates,

Closed water circuit at the Central Headquarters in Alhama, as well as installation of photovoltaic panels for the company's own consumption.

Installation of solar panels on trailers to generate renewable energy (green cooling).



A world without waste

The company aims to ensure proper waste management through specific initiatives such as:

Tyre recycling programmes, as well as reducing pollution across the entire process, ranging from food handling to lorry and infrastructure management, etc.

Collaboration with the Spanish Queen Sofia Foundation and the CSIC (Advanced Centre for Scientific Research) to reduce the negative impact of plastic waste on our environment and promote the circular economy.

Training given to all the new employees to raise their awareness about the importance of waste management.



Development of human capital

People are the Group's main asset. It intends to ensure social welfare through governance elements to foster the best work environment:

Improving employee's health and safety through specific measures and their monitoring by the Safety and Health Committee.

Code of ethics and harassment and discrimination protocol, along with effective equality policies.

Development of an "Efficient Driving Programme", which includes training in sustainability, customer service quality, efficiency, etc.

Ongoing cross-cutting training plan adapted to existing backgrounds (occupational hazards, environmental topics, foreign languages, food safety, quality standards, etc.).



Fuel consumption and emission reduction policy

The Group is committed to taking measures aimed at mitigating the effects of climate change and reducing fuel consumption and its associated GHG emissions through several initiatives such as:

Incorporation of new elements into the vehicle fleet to reduce air emissions and fuel consumption (new Euro VI engine, Michelin X Line Energy tyres, etc.), along with the fleet's continuous renovation.

Incorporation of gas (LNG) or green hydrogen-powered (H2) lorries into the fleet to reduce polluting emissions (GHG and non-GHG) such as CO2, NOx, NH4, and suspended particles, among others.

Joint collaboration with Simumak to develop the first lorry simulator. This initiative allows us to enhance safer and more efficient driving.

Development of efficient driving programmes for internal personnel and route optimisation by studying predictive models and artificial intelligence to reduce consumption.

Acquisition of carbon credits and fostering CO2 sinks to offset the organisation's total carbon footprint.



Commitment to stakeholders

This is one of the Group's essential values, which promotes active engagement and dialogue. This aspect has a direct impact on our decision-making:

Promotion of ESG principles, sustainability, equality and transparency in line with the ethical principles we stand for (for example, through the Suppliers and Subcontractors' Code of Ethics).

Obtaining international recognition on ESG matters through the ESG Risk Rating (devised by the company Sustainalytics), which recognises Primafrío as one of the 20 companies in the logistics and haulage industry having the best ESG rating anywhere in the world. We scored above the industry average in all the areas subject to assessment.

The essential ESG cornerstones mentioned above are the bases for the **environmental policy** set by the Primafrío Group, as well as for its R&D and **Innovation strategy**, which are set out in more detail in the following sections of this NFRS.

Collaboration with different non-profit organisations and active participation in social R&D and innovation projects with the Region of Murcia's most important universities.

In-house Corporate Social Responsibility (CSR) Department.

Setting up the Primafrío Foundation, a non-profit organisation, to respond to social, economic and environmental challenges, as well as to promote sport and defend the environment and biodiversity.

Ensure customer satisfaction by controlling and analysing hazardous points using HACCP systems and quality audits.



Environment

Environment

Commitment to the Environment

One of the Primafrío Group's undertakings is to ensure our company is sustainable and can meet the most stringent standards for caring for and protecting the environment. We are actively working on reducing our environmental impact and on offering products and services that promote the development of a sustainable economy. In order to do so, we are committed to implementing and carrying out actions like the following: [GRI 305-5]

- **ISO 14001 certification**, the international environmental management system standard, at our Central Headquarters in Alhama de Murcia, along with ISO 50001 certification, which certifies an efficient energy management system.
- Raising all our workforce's awareness about the environment through training activities and environmental policies.
- Calculating our **environmental footprint** to know the impact of our activities.
- **The most advanced technology** to reduce air emissions and consumption through the incorporation of electric and liquid natural gas-powered vehicles into our fleet.
- Inclusion of alternative logistical modalities like **gas (LNG) or green hydrogen-powered (H2) lorries** to reduce polluting emissions.
- Partnerships with our partners **to reduce CO₂ emissions**, like the one we have established with the tyre manufacturer Michelin, which allow us to reduce consumption and ensure a circular economy after the use cycle has come to an end.



Primafrío Group seeks to provide services that meet our customers' needs by meeting specific requirements, making an effort to fulfil any expectations they may have about the services we provide, optimising resources and fully integrating employees by means of capacity building, motivation and training. In 2022, the Primafrío Group did not identify any significant environmental liabilities, expenses, assets, provisions or contingencies.

Commitment to Sustainability

The Primafrío Group is fully **committed to both the environment and our employees**. We foster active engagement and dialogue with our stakeholders by providing a response to the challenges society and the environment demands of us. This report constitutes an exhaustive, balanced and complete presentation of the Primafrío Group's social and environmental performance and a reflection of our commitment to transparency, continuous improvement and integrity.

Our intention has been to set out the evolution the Primafrío Group is undergoing and the way it is adapting to new times. It is a reflection of the commitment this management team has undertaken **to a strategy which includes sustainability-related goals and aspects in our business management by assuming a new management model** in which our stakeholders' opinions and interest take on a leading role in our decision-making.

Our **sustainability plan** is aimed at covering the risks and opportunities that are to be found in our context by integrating solutions to provide a response to the communities in which the Primafrío Group performs its activity, thereby ensuring this organisation's long-term continuity and growth.

Our commitment to sustainability, innovation, transparency and society will allow us to face 2023 with the aim of the Primafrío Group continuing to be a benchmark in the logistics industry.



Sustainability Policy

The Primafrío Group has undertaken the following commitments:

- Review our performance on a periodic basis and drive forward practices which **improve** its impact on the environment.
- **Communicate** actively with our stakeholders to know and analyse their needs and expectations.
- **Implement action guidelines** aligned **with our values**, especially in relation to human rights, environmental protection, health and safety, energy efficiency, combatting climate change, diversity, equal opportunities, fiscal responsibility, crime prevention and combatting corruption.
- Integrate **sustainability** into all our processes and organisational levels, taking into account our stakeholders' opinion.
- **Reduce our greenhouse gas emissions** to mitigate the effects of climate change.
- Implement energy efficiency policies and plans that ensure the use of safe, efficient and green energy.
- Improve the skills of our workforce's professional drivers through **advanced digital training** in efficient driving and road safety.
- Fulfil legal requirements that are in force, as well as any other requirements that we voluntarily endorse.
- Set objectives that contribute to attaining the targets set by the Sustainable Development Goals.
- Systematically review and assess our management systems by establishing continuous improvement mechanisms, assessing life cycle performance and carry out any actions needed to attain the goals



- Convey our **sustainability culture** to all interested parties.
- Respond to stakeholders **transparently** through our reports' economic, environmental and social performance indicators.
- Promote the search for sustainable and **circular economy businesses** by granting them social value and establishing alliances and partnerships with other stakeholders.
- Maintain **labour relations** with our employees that are based on respect, safe and healthy work, equal opportunities and their motivation.
- Earn our stakeholders' **trust and credibility** through responsible governance.
- **Promote socially responsible actions** by making a contribution to improving opportunities in the communities in which Primafrío Group exerts an influence
- **Foster academic excellence** and entrepreneurial talent through grants, scholarships and chairs by means of agreements with the University of Murcia, the UCAM (San Antonio Catholic University of Murcia) and the Cartagena Polytechnic University, as well as with over 30 European universities.

Legal Framework

The conceptual and legal framework upon which the Primafrío Group's sustainability and CSR Policy actions are based is as follows:

Spanish Constitution

Article 45 of the Spanish Constitution: 1. All are entitled to the right to enjoy a suitable environment for personal development, and they have the duty of conserving it.

Climate Change and Energy Transition Act

By means of this act, the principal objective of achieving climate neutrality by 2050 has been incorporated into the Spanish legal system and the following goals for 2030 have been set:

- A final energy consumption penetration rate of at least 35% from renewable energy sources.
- At least 70% of generation in the electricity system is to be from renewable energy sources.
- Reduction of at least 35% in primary energy consumption with regard to the baseline set by EU regulations.

CNMV Code of Good Governance (26/6/2020)

Recommendations 53, 54 and 55: sustainability.

The term "corporate social responsibility" is essentially replaced by the much broader and commonly accepted term "sustainability", which is associated to environmental, social and corporate governance (ESG) aspects, and recommendation 53 is divided into two different recommendations, numbers 53 and 54, so that the previous recommendation 54 becomes recommendation 55.

Decarbonisation Strategy up to 2050

This strategy will allow an emission reduction pathway to be established and sink absorptions to be increased by all economic sectors over a long-term period. Said strategy may be reviewed every five years and will turn out to be essential to meet the goals the European Union has set.

Sustainable and Smart Mobility Strategy of the European Commission

The Group's initiatives are coordinated with this recently introduced strategy, in which one of the principal milestones is to reduce logistics-related greenhouse gas (GHG) emissions by 90 percent by 2030.

This policy states the general guidelines and sets the bases that should govern the Primafrío Group's sustainable development strategy and ensure that all its activities and businesses are carried out by promoting sustainable value creation.

United Nations: Paris Agreement

The Primafrío Group is committed to performing its activity in accordance with the United Nations Sustainable Development Goals (SDGs) in order to attain sustained growth and value for our customers, employees, suppliers and society as a whole. The goals set by the Paris Agreement will be achieved through these 17 SDGs.

Sustainable Development Goals

[GRI 102-43] [GRI 413-1] [GRI 413-2]



The Primafrío Group is committed to performing its activity in accordance with the United Nations Sustainable Development Goals (SDGs) in order to attain sustained growth and value for our customers, employees, suppliers and society as a whole. The goals set by the Paris Agreement will be achieved through these 17 SDGs.

The Sustainable Development Goals we identify with most are the following:



We wish to make a contribution to reducing poverty and enhancing well-being and the economy through social initiatives that support especially relevant events.



Committed to the community, food collection campaigns are organised through the Primafrío Foundation.



The Primafrío Group promotes sport and its values through sponsorship programmes for different teams.



We carry out programmes that foster outreach actions through the Foundation and promote the transfer of knowledge through university chairs.



We promote the creation of a diverse and inclusive workplace free from any discrimination. This policy is reflected in the Equality Plan.



Our logistics centres are designed to be self-sufficient. The energy they consume comes from renewable sources and we participate in projects geared at the industry's decarbonisation.



The company focuses its efforts on attracting and retaining talent by fostering training and the creation of work environments designed to motivate and incentivise employees.



We contribute to the logistics industry's digitisation by implementing innovative processes and technologies in our operations.



We help disadvantaged groups through the Primafrío Foundation by means of aid programmes to cover especial situations and training grants.



We participate in the development of infrastructures and technologies in order to make logistics safer, more accessible and sustainable.



The Quality Department together with the R&D Department constantly review our operational processes to improve and adopt sustainable practices.



As far as the fight against climate change is concerned, we reduce and offset our carbon footprint through innovation and initiatives.



We collaborate in the development of projects aimed at preserving the environment, such as the reforestation of a tropical rain forest in Mesoamerica.



We promote cooperation and alliances involving different companies to deal with sustainable projects and initiatives in which ideas are exchanged and innovation is encouraged in order to give them a broader scope.

2030 Agenda

The European Commission envisages a climate-neutral Europe with a prosperous, modern, competitive and sustainable economy by 2050. This target is in line with the Paris Agreement's objective to keep the rise in global temperatures below 2°C and is therefore leading the fight against climate change at a global level.

In its unwavering commitment to this initiative, the Primafrío Group intends to be 20 years ahead of schedule by meeting the **ZERO-EMISSIONS** target in 2030 thanks to its innovation and development projects, along with its partnerships with entities to offset its activity's impact.

The Group thus seeks to minimise and neutralise its impact caused by polluting air emissions, including both GHG and non-GHG (CO₂, NO_x, NH₄, and suspended particles, to mention but a few).

It is a highly ambitious goal that is already underway through a strategically defined action plan.

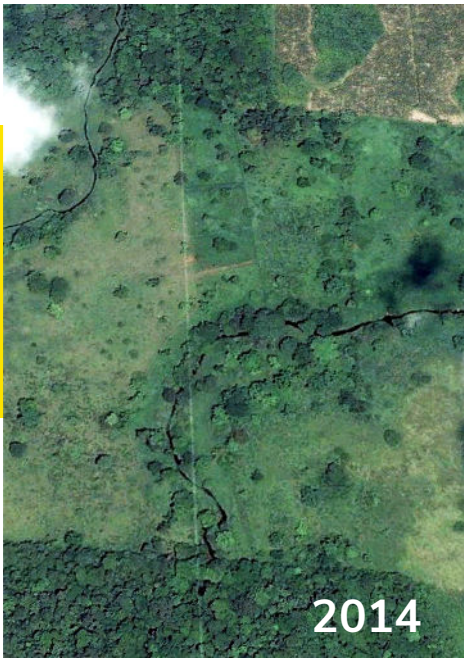


Relevant Initiatives

[GRI 201-2]

Biodiversity Partnership Mesoamerica

This is an environmental initiative devised in San José, Costa Rica which aims to involve the private sector in conservation actions in the Mesoamerican natural environment. Hence, the different members involved in this initiative pool their resources and experiences to achieve a common goal: sustainability. In general terms, the Primafrío Group has demonstrated its commitment to the environment. In this particular initiative, it is taking part in the BPM's management board and our R&D Department Manager, Adrián Valverde, is the project's General Secretary.



Ecological Fleet Accreditation

This is a service developed by the AEGFA (Spanish Association of Automobile Fleet and Mobility Managers) in conjunction with the IDAE (Institute for Energy Diversification and Savings of the Ministry for Ecological Transition and the Demographic Challenge). It is aimed at public and private fleets wishing to differentiate themselves by implementing energy efficiency improvements and reducing polluting and greenhouse emissions.

The programme's aims include corroborating the measures taken by the Primafrío Group and measuring their impact, in addition to helping the company foster new measures by accompanying it throughout their implementation. As a result, the fleets that take part in the initiative receive an Ecological Fleet Accreditation.

In the words of Adrian Valverde, the Primafrío Group's R&D and ESG Manager, "us joining the Ecological Fleet Programme confirms that our actions to combat climate change have a positive impact on our activity by managing to neutralise polluting emissions. We additionally managed to achieve significant energy savings in our operations and contributed to caring for and protecting the environment through facts under the AEGFA's supervision.



Lean & Green

The Primafrío Group has joined the international Lean & Green project run by the AECOC (Manufacturers and Distributors Association), which is geared at reducing greenhouse gas emissions from the supply chain to thus achieve the decarbonisation of logistics.

By endorsing this project, the Primafrío Group has firmly committed itself to sustainable logistics and undertakes to reduce its emissions by 20% within a five-year period at most. We will likewise set new specific sustainability goals through an individual action plan by applying specific protocols like the Carbon Footprint Calculation Guide developed by the AECOC. We also made the undertaking to be assessed by an accredited auditing firm, thereby providing transparency and traceability.

Lean & Green is an international collaboration platform which is aimed at helping companies in all kinds of industries to reduce their greenhouse gas emissions from logistics activities to reach the carbon neutral targets set in the Paris Climate Summit (COP21) by 2050.

Innovation

Innovation

Efficient driving programme

The concept of "efficient driving" takes on special importance in our pursuit of increased logistics efficiency. At the PrimaFrio Group we are committed to driving our vehicles according to this technique with the aim of reducing consumption and polluting air emissions, as well as to improve road safety.

In order to achieve this, we have devised an Efficient Driving Manual, which contains the techniques of how to drive well.



Principal Collaborations

Significant strategic alliances have been established with a variety of technology partners in order to develop research lines for logistics R&D projects and achieve all kinds of technological advances.

- Joining the board of trustees of the **Cotec Foundation** for Innovation as a response to improve the company's efficiency, services and competitiveness, along with training in each of the processes that are being implemented in the logistics industry.
- Joining the board of **trustees of the Isaac Peral** Foundation, an institution dedicated to developing and strengthening the Region of Murcia's technology and industrial ecosystem.
- Cooperation and collaboration with different companies specialising in technological development and research, such as **Nikola and Applus Idiada**, in projects related to green hydrogen and hybrid electric powertrains for the logistics and haulage industry.
- In response to the need to **promote research**, different forms of collaboration have been established with three universities in the Region of Murcia.



Cartagena Polytechnic University

Primafrío joined the Chair Network of the Cartagena Polytechnic University (UPCT), in which it carries out R&D and Innovation actions in the field of 4.0 logistics and road haulage.

The aim of the chair is focused on the practical application of knowledge. It fosters innovation and includes the possibility of making calls for student scholarships in the schools of Industrial Agronomics and Telecommunications Engineering, as well as completing bachelor's and master's end-of-degree projects.

By means of this collaboration agreement, the company has reaffirmed its commitment to innovation and the industry's development through training and professionalisation.

University of Murcia

The University of Murcia (UMU) and Primafrío have signed a collaboration agreement to establish a research, training and outreach environment in the road logistics industry through the Primafrío Chair in which students, professors and industry professionals take part. Research projects and studies are thus carried out and training is promoted through courses and master's degrees.

San Antonio Catholic University

The Primafrío Group collaborates with the San Antonio Catholic University (UCAM) in terms of innovation in logistics. Scientific counselling and interchange actions are carried out in the area of refrigerated road logistics, in which teaching and research play a crucial role, with the aim of becoming a benchmark within the industry.

Tech Joint-Ventures

Significant strategic alliances have been established with a variety of technology partners in order to develop research lines for logistics R&D projects.

PRIMAVIA is a joint venture involving Primafrío and VIIA, a company belonging to SNCF, to promote and offer intermodal services from Spain to Central Europe and the United Kingdom in order to meet our customers' needs and reduce the company's carbon footprint and environmental impact.

PRIMAVER is a joint venture involving Primafrío and Réseau Primever, a company belonging to STEF and Groupe Satar, aimed at breaking into the French market by offering fruit and vegetable groupage services from Spain.

LOGIST CARGO is a logistics agency that specialises in international logistics and haulage with ADR equipment, using both refrigerated and tautliner lorries.

PRIMAPHARMA is a subsidiary of the Primafrío Group which specialises in the international logistics of pharmaceutical products for FTL cargoes.



Decarbonisation

The Primafrío Group is Europe's leading logistics operator and, based on its commitment to the environment, it intends to contribute to and also lead the **industry's decarbonisation and ecological transformation**.

In order to achieve this goal, 25 Memorandums of Interest have been submitted with different companies in which projects are being carried out for a fair and inclusive energy transition, thereby anticipating the obligatory nature of European restrictions and, on the other hand, collaborating on the job and wealth creation brought about by encouraging innovation.

These are geared at projects that are driving forces for a just and inclusive energy transition, including: renewable hydrogen, electric mobility, charging infrastructures, and vehicle fleet innovation and electrification within the framework of the Recovery, Transformation and Resilience Plan. They also include digital connectivity, promotion of cybersecurity and 5G within the framework of the Recovery, Transformation and Resilience Plan.



Emissions – Carbon Footprint

[GRI 305-1] [GRI 305-2] [GRI 305-3]

"Carbon footprint" is construed to mean "all the greenhouse gases emitted either directly or indirectly by an individual, organisation, event or product".

The outcome of carbon footprint analysis is data that can be used as an overall environmental indicator of the activity performed by an organisation. The carbon footprint is therefore a basic benchmark to initiate energy consumption reduction actions and use resources and materials in a more environmentally friendly way.

The aims of calculating the carbon footprint are as follows:

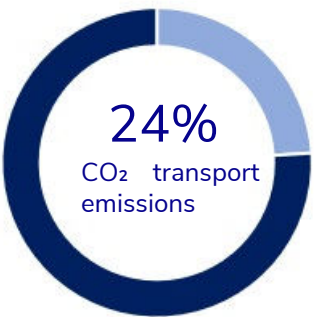
- Social responsibility.
- Detailed knowledge of the organisation's energy consumption.
- Identification of energy cost savings opportunities.
- Anticipating future regulations.
- Competitive advantage as regards customers which value this kind of actions.

The emissions associated to an organisation's operations can be either be classified as direct or indirect emissions.

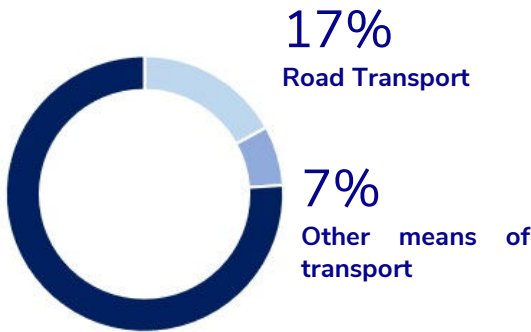
- Direct GHG emissions: These are emissions from sources that are owned or controlled by the organisation.
- Indirect GHG emissions: These are emissions resulting from the organisation's activities, but which are generated by sources that are owned or controlled by another organisation.

Greenhouse Gas Emissions (GHG) in the industry

According to studies conducted in 2021, transport services were responsible for **around 24% of all GHG emissions in the EU**, making them the second most emitting sector (after the energy industry). Moreover, road haulage alone accounted for approximately 17% of the EU's total GHG emissions (Figures 1 and 2).



GHG emissions in the EU from the transport industry (Source: European Commission)



GHG emissions in the EU by means of transport (Source: European Commission)

Carbon Footprint Calculation

[GRI 305-3] [GRI 305-6] [GRI 305-7]

Calculation of the Primafrío Group's carbon footprint has been done according to the UNE-EN ISO 14064-1:2012 standard, along with the help provided by the "Guide for Calculating an Organisation's Carbon Footprint and Preparing its Improvement Plan", which was drawn up by the Spanish Climate Change Office of the Ministry for the Ecological Transition and the Demographic Challenge.

All GHG emission sources are identified through the carbon footprint's calculation and better knowledge about critical points is consequently gained. Consumption reduction and energy efficiency measures can therefore be set more accurately.

The Group's carbon footprint calculation in relation to its main activity is set out in detail below, which mainly comes from the fuel consumption needed to transport goods throughout Europe.

The Group is working on gathering and obtaining the data on Scope 3 emissions, though it is estimated they are barely significant in relation to total emissions.

Atmospheric pollution in the form of noise and light pollution generated by the Group from its activity is not significant.

Decarbonisation – KPIs 21’-22’

Polluting emissions resulting from the Primafrio Group's activity mainly come from the consumption of fuel needed to transport goods throughout Europe. Emissions resulting from energy and water consumption, along with others of lesser relevance, are also monitored.

The company's consumption rises as its activity grows. Hence, annual increases should not be related and are relativised instead in terms of other variables.



Fuel: Litres of fuel are related to kilometres travelled (l/100 km). Consumption of diesel A fuel in 2022 fell by 0.34% as compared to 2021.

Energy: As far as energy consumption is concerned and assuming there is a constant expenditure baseline linked to the offices, a variable part can be identified which is linked to the warehouses, where the flow to temperature-controlled goods takes place. Energy consumption is relativised in relation to goods cargoes (kWh/kg). Consumption in 2022 fell by 10.23% as compared to 2021.

Water: Thanks to the Group's technological innovation, the top priority of which is to reduce operating costs and employ circular economy techniques, the Central Headquarters in Alhama de Murcia is equipped with management processes and tools that have allowed it to reduce drinking water consumption by 70%, taking advantage of several grey water and rainwater cycles.

* Estimates calculated from the SAP platform's internal information (kilometres travelled and our fleet's diesel consumption); energy management platform (consumption); fleet management program (tonnes transported).



Cybersecurity

Technology has become increasingly integrated into the digital side of the business world in recent years. Cyberattacks and cyberthreats are also becoming more frequent. The Primafrío Group is not only the leading company in temperature-controlled logistics, it has also managed to consolidate itself as a technology-based company. Primafrío therefore invests in and conducts research on the latest cybersecurity advances in order to prevent said cyberattacks.

To ensure continuity of our service's provision, we protect all information on customers and trips, including: vehicle positions in real time, temperature monitoring to keep goods in good condition, place and time of delivery, etc.

We are additionally equipped with a DLP (Data Loss Prevention) system to prevent both internal and external data leaks, as well as with the possibility of restricting the use of such data once it is outside the organisation.

This cybersecurity model envisages the following goals:

- ✓ Ensure our customers and employees' privacy.
- ✓ Ensure legal, regulatory and contractual compliance.
- ✓ Confidentiality, ensure that only authorised people have access to certain data.
- ✓ Establish a secure digital environment.
- ✓ Manage any security incident and provide resilience should they occur.



Work was done in 2020 on drilling and training technical IT staff to prepare for ISO 27001 certification, which is focused on assessing business organisations' information security management systems. Said certification was granted in 2021.

Human Team

Human Team

Capital Team

The Primafrío Group's success is primarily based on its professionals. The Primafrío Group considers it essential provide a top-quality work environment that is based on respect, diversity and personal and professional development.

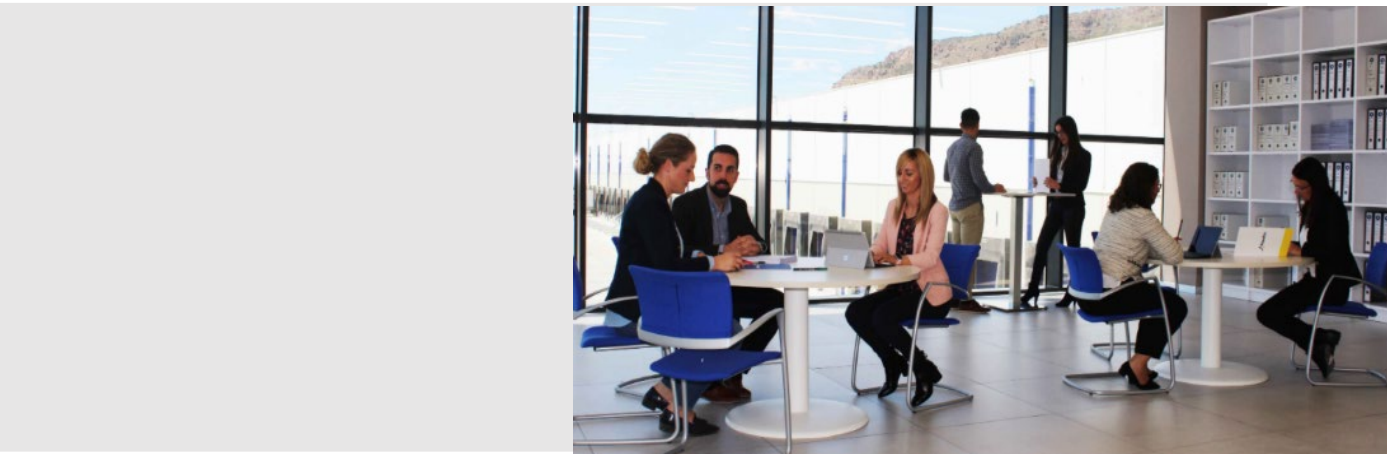
People who suffer any kind of discrimination or who feel they have not been fairly rewarded tend to lose their pride in belonging to the organisation and lower their productivity. Likewise, a rise in wage inequality leads to a reduction in profitability, productivity and business competitiveness.

The logistics industry's profound transformation and digitisation require new knowledge and skills which, if they are not quickly covered, will place the Group at a disadvantage compared to its competitors, leading to the corresponding consequences it may have on the business.

In addition, the Primafrío Group has implemented a Code of Ethics which sets forth the guidelines that must govern all its employees' ethical behaviour in their day-to-day tasks and, more specifically, with regard to the relationships and interactions the Group maintains with all its stakeholders.

We can count on a highly specialised and committed human team that provides service to diverse business and development areas. However, we are still essentially a family-run business which works on a day-to-day basis to continue being a benchmark in road goods haulage logistics having domestic and internal coverage.

On the one hand, our **structural personnel** are charge of monitoring, collecting, sending and supervising goods throughout Europe. On the other, **our drivers, warehouse staff and mechanical staff** are professionals who perform an essential function in each of the services we provide and are the mainstay of our activity.



Employee welfare

Organisation of work

The annual working day is set in accordance with terms envisaged in the collective bargaining agreements which apply.

The Group's management agrees on the need to restrict overtime to the necessary minimum by providing work organisation tools and systems that make it possible to improve the organisation's efficiency on a permanent basis. Should it be needed, the possibility of doing overtime at the Primafrío Group is envisaged and employees can choose from among a variety of compensation schemes.

Most of the personnel who work at the offices of the Primafrío Group's subsidiaries are concentrated in a large room where the routes the company's lorries follow are coordinated. Nearly 300 people distributed into three shifts coordinate the routes each vehicle must take, along with the loading and unloading work. They are responsible for the fleet's circulation, which is comprised of over 2,700 vehicles. This service, which in charge of resolving any setbacks that may arise for each driver, operates seven days a week.

*Organic Act 3/2018 of 5 December on Personal Data Protection and Safeguarding Digital Rights

Work-personal-family balance measures

[GRI 401-2] [GRI 401-3]

The measures for balancing personal, family and working life implemented by the Primafrío Group are those set forth by the Law. The most common include breastfeeding leave, maternity/paternity leave, holiday flexibility and flexible working hours depending on the departments and availability.

Furthermore, the "Prima Concilia" programme was implemented at the beginning of 2019, which provides a games room service at the weekends and holidays for working parents. Camps for younger children are also opened during the summer holidays, where a variety of workshops, sports activities and health and prevention chats are held, to mention but a few.



Occupational prevention, health and safety
[GRI 403-4]

The Group's management considers proper management of occupational hazard prevention as one of its main goals, thereby fulfilling the legislation which applies. It likewise fosters continuous improvement in hazard control, working conditions and the workforce's welfare.

Occupational welfare

- **Medical Coverage Plan** to cover complementary healthcare at very advantageous conditions for all employees.
- **Exclusive discounts** on car/motorcycle or home insurance policies for being an employee of the Group, including next of kin.
- **Gym** with instructors, a laundry, a driver's rest area open 24 hours a day and a supermarket at the new facilities.
- **Personal activities:** Photography contest, etc.
- **Health & Safety Committee** The highest engagement and consultation body on occupational hazard prevention matters. These committees are set up pursuant to the Occupational Hazard Prevention Act and hold the competencies envisaged by the act. They usually meet on a quarterly basis.

The Prevention Service's activities

General activities: Counselling on occupational hazard prevention, checking working conditions, assessing occupational hazards, providing training and information to employees, investigating work accidents, emergency measures, annual activity report (technical prevention), occupation hazard prevention plan, planning preventive activities, scheduling technical prevention and occupational medicine activities.

Ergonomics-Psychosociology | Industrial Hygiene | Occupational Medicine

Importance of road safety
[GRI 403-2]

- Road safety training is crucial for convincing drivers to adopt safe practices and positive driving habits.
- Theoretical and practical training activities (including both efficient driving and road safety) for drivers —the group most prone to suffering this kind of accidents— are launched on an annual basis as part of the Training Plan.
- Road safety tips published in the internal newsletter.

Severity rate =

Number of days lost

Total man-hours of exposure to hazards

x1,000

Social relationships

Social dialogue

[GRI 402-1]

The Primafrío Group guarantees its employees' rights to trade union membership, association and collective bargaining within the framework of the labour legislation that is in force and the collective bargaining agreement that may apply at any given time.

Percentage of employees covered by collective bargaining agreements by country

All of the Primafrío Group's employees in every country where it has a presence were covered in 2021 and 2022 by the collective bargaining agreements which apply. [GRI 102-41]

Training

The Primafrío Group seeks to enhance not only the technical know-how of its workforce but also its skills and competencies by fostering its comprehensive development. This has an impact on talent retention and the ability to continue providing an outstanding service to our customers.

Dual vocational training in our CSR strategy

- The organisation is committed to dual vocational training, a type of training in which the student body is comprised of workers, which therefore speeds up the development of professional competencies in an optimal way. It also favours students' quick adaptation to the organisation.
- The Primafrío Group is collaborating with the Region of Murcia's social development through this dual vocational training project, thus improving the qualifications of its productive resources and helping young people enter the job market

Harmonised dual vocational training

Thanks to this training model, students are able to gain first-hand knowledge of a company's real work dynamics and are provided with experience and new knowledge.

For its part, these programmes allow the company to establish direct contact with young people who will become future members of the haulage and logistics industry, thus making it possible to guide their carriers in keeping with the industry's changing demands. This favours their entry into the job market and, as a training company, ensures they are better prepared and qualified.



Training

The Primafrío Group seeks to enhance not only the technical know-how of its workforce but also its skills and competencies by fostering its comprehensive development. This has an impact on talent retention and the ability to continue providing an outstanding service to our customers.

In order to achieve this, an ongoing training plan adapted to the different backgrounds that comprise the Primafrío Group has been designed. This training contributes to the workforce remaining prepared, competitive and constantly up to date in so far as its competencies and duties are concerned.

The Primafrío Group's employees received over 161,000 hours of training in 2022 (over 169,000 hours of training in 2021), which on average accounted for 30 hours per employee in 2022 (on average 39 hours per employee in 2021).

[GRI 404-2]

Drivers, who account for the majority of the workforce, received more than 145,000 hours of training (167,000 hours of training in 2021).

Training plan

The Training Policy is set on an annual basis by following a procedure which consists of knowing the different departments' training needs based on the organisation's general objectives.

More specifically, courses on cross-cutting areas are given, as are training actions in occupational hazard prevention, the environment, food safety and quality standards, not to mention other topics.

Specific courses on tachographs, thermographs, forklift trucks, transport safety, efficient driving and other topics are given to logistics professionals.



Integration, Equality and Diversity

Equality at work is an unwavering commitment made by the Primafrío Group. The Group acts according to a policy of zero tolerance for any kind of discrimination, regardless of whether it is based on sex, marital status, age, race, social status, religious or political ideas, disability, etc.

Equality Plan

[GRI 405-1] [405-2]

The Group's commitment to equality and work-family balance was endorsed by the approval of the Equality Plan, which highlights equal opportunities and diversity as two of the basic principles of the Group's business culture.

The Equality Plan's general goals are as follows:

- Progress towards equal opportunities and equal treatment for men and women.
- Integrate the gender approach into the organisation's management more effectively.
- Foster the personal, family and work balance of the Primafrío Group's employees.
- Ensure equal pay for work of equal value.

Integrating people with a disability at work

The cleaning of our facilities has been carried out by the Jera Avanza Special Employment Centre since July 2019



An agreement was reached with them by means of which a total of seven people with disabilities are working at Alhama de Murcia in Murcia, San Román in the Basque Country and Vilamalla in Gerona for a five-year period.

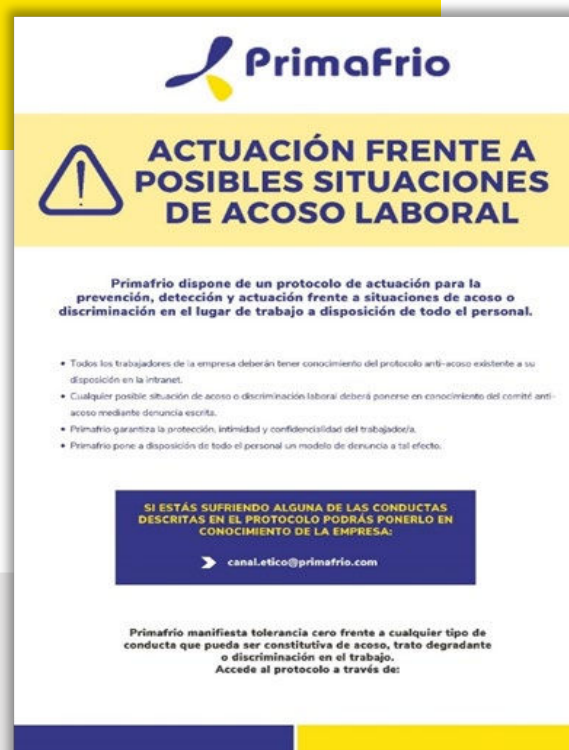
The work these people are doing within the company essentially consists of cleaning common and sensitive areas, disinfection and cleaning of façades, and cleaning glazing at a height. Five of them work at the Alhama de Murcia site, one at the San Román site and another at Vilamalla.

The Jera Avanza Special Employment Centre provides workers suffering from a disability with the possibility entering the job market, thereby making it easier for them to get a remunerated job that is suitable for their personal characteristics.

The Primafrío Group has entrusted cleaning work at its facilities to the SAMSIC IBERIA Special Employment Centre as from September 2022. It is another centre that is committed to helping people with disabilities entering job market.

Its general principles are as follows:

- **Non-discrimination and respect for personal dignity.**
- **Zero tolerance for any behaviour that could be considered as harassment, degrading treatment or discrimination.**
- **Confidentiality and speed.**
- **Effectiveness, coordination and participation.**
- **Prevention and training.**
- **Opportunity and equity.**



Code of Ethics

This Code applies to and must be fulfilled by all members of the Governing Body, senior executives and employees of the Primafrío Group and the companies which comprise it, who must know and expressly accept the values, principles and guidelines for conduct it contains.

Similarly, the Primafrío Group and the companies which comprise it will encourage their suppliers, customers and collaborating companies or entities to adapt their behaviour to similar guidelines for action as those set forth in this Code of Ethics. They may likewise demand such parties' endorsement of its principles and require that a failure to fulfil them be deemed a breach of a contractual obligation.

The Primafrío Group and the companies which comprise it will place all the means at their disposal to ensure the rules contained in the Code of Conduct are fulfilled.

The Prevention Committee has placed at the disposal of executives, employees and any third parties with which the company maintains some kind of relationship (suppliers, contractors, etc.) a postal and e-mail address through which queries may be made regarding the Code of Ethics' interpretation or to report any possible violation or breach thereof.

One report was received from an employee of the Group in 2022. After an investigation conducted by the Anti-Harassment Committee, it was concluded that the necessary elements did not arise to deem this case as a case of workplace harassment.

1 Report since the implementation of Compliance

Respect for the dignity of people in their job

The Primafrío Group rejects any kind of physical, psychological or moral harassment or abuse of authority. Any conduct that may lead to a threatening, intimidating, offensive or hostile environment to the rights of people is forbidden.

The Primafrío Group's employees will be treated fairly and respectfully, thereby fostering a healthy and safe work environment. The Primafrío Group intends to prevent any conduct that violates the dignity, equality and sexual freedom of the company's workers or those of third parties. It also aims to prevent any kind of discrimination based on gender, colour, age, religion, sexual orientation, race, culture, education, marital status or nationality

Promotion and fulfilment of ILO provisions

[GRI 102-16] [GRI 407-1] [GRI 408-1] [GRI 409-1]

The Primafrío Group has made a Query and Whistleblowing Channel available to ensure the Code of Ethics is properly fulfilled. This is a confidential means of communication through which queries may be made (whenever there is a doubt or question about the code) and any irregular conduct reported.

Implementation of due diligence procedures

[GRI 102-16] [GRI 102-17] [GRI 412-2]

This process involves identifying any potential human rights impacts across the entire value chain to subsequently integrate its conclusions into the Group's processes. The Primafrío Group reviews and updates its due diligence processes on a regular basis. In order to do so, it uses the best practices identified both within the Group as well as externally in order to devise a due diligence model.

Over the course of 2022, the Primafrío Group did not receive any reports about cases of human rights violations.



Combatting Corruption

Combatting corruption and money laundering

[GRI 102-16] [GRI 102-17]

The executives and employees of the Primafrío Group must act in accordance with the laws that apply and, under no circumstances, may they influence the will of people outside the Group to obtain any kind of benefit or advantage unlawfully.

Corrupt arrangements with customers, suppliers, civil servants or any other third parties are strictly forbidden. The executives and employees of the Primafrío Group and the companies which comprise it may not receive from or offer to people at the service of public or private companies, political parties or candidates for public office payments in cash, in kind, gifts or any other benefit with the intention of obtaining or maintaining unlawful business dealings or obtaining advantages unfairly.

Within the framework of private business relationships, it is forbidden to offer any kind of unlawful advantage to other companies' executives or employees in order to encourage them to acquire services or products from the Primafrío Group and thereby failing to fulfil their duties.

The Primafrío Group forbids any kind of behaviour by its executives or employees which is aimed at manipulating the outcome of a public tender called by the Public Administration through an agreement with other bidders or bribing them to withdraw from a tender, or by corrupting Spanish and foreign civil servants to provide relevant data or award the tender, or in any other way.

Neither may employees and executives of the Primafrío Group make payments intended speed up formalities with the Administration or a judicial body.

Measures to combat money laundering

[\[GRI 102-16\]](#) [\[GRI 102-17\]](#)

The Primafrío Group will ensure that any irregular payments or money laundering originating in illicit or criminal activities are prevented from taking place in the performance of its activities.

The executives and employees of the Primafrío Group will closely examine any economic transactions which, due to their nature or amount, could be deemed unusual, placing special emphasis on controlling those that are made in cash, through bearer cheques, with destination bank accounts located in tax havens, payments made in currencies other than those set forth in contracts or any billing and payments made by third parties not mentioned in the contract.

Likewise, the Primafrío Group will diligently investigate the professional honesty of the companies or real persons which whom it establishes significant business relationships for the purpose of preventing transactions that may be used for money laundering.

[\[GRI 102-16\]](#) [\[GRI 102-17\]](#)

Donations and partnerships

[\[GRI 201-1\]](#) [\[GRI 413-1\]](#)

Any donations which the Primafrío Group and the companies which comprise it make to social projects must have been duly authorised internally beforehand and will be made to prestigious entities endowed with a suitable organisational structure to ensure the proper administration of resources. Such donations must be faithfully reflected in the Group's accounting records and books and may not be used to cover up an improper payment or bribe.

Donations to political parties or their representatives may not be made. The Primafrío Group must likewise monitor any donations it makes in order to know their use or destination.

The aggregate amount of donations, partnerships and associations for these items amounted to €545,000 in 2022 (€490,000 in 2021).

Social Projects

Companies must contribute to **social progress** through their commitment to the environment and **future generations**. At the Primafrío Group we are particularly aware of the need to protect our environment and the company's corporate social responsibility to make the company a pleasant place to work.

Right from the very start, we have made an effort to offer the very best road logistics services, thereby contributing to the social development of the **Region of Murcia** and Spain as a whole by generating wealth and job opportunities through social initiatives.

At the Primafrío Group, the values of **honesty, equity and integrity** must be the bases for our socially responsible organisation's conduct, which involves being concerned for the environment, people and society at large, in addition to an undertaking to minimise as much as possible the impact of our activities and decisions.

In this regard, we carry out a series of actions every year that foster the consolidation of these values, which are summed up below.

Working Women's Day

On the occasion of International Working Women's Day, we wanted to spread the message of equal opportunities in the workplace by printing a screensaver containing a commemorative image of said day.

"Dissemination among colleagues by printing a commemorative image of the day on their screensavers to remind us all of this day's message: equal opportunities for all."

Games room

The Group considers that the people who work for it are its best asset. We therefore consider it important to carry out actions to foster work-family balance. Over the course of the 2020-2021 school year, education in the region of Murcia largely consisted of blended learning due to the COVID-19 pandemic. In order to provide a response to the work-family balance problems which arose, the Group opened a "conciliation school" in conjunction with the Alhama de Murcia local authority, which granted us use of the "El Berro" school in Sierra Espuña.

Since then, this service has become very popular among our employees and an increasing number of them are using it.



Protected centre certificate

As part of our "Prima-Health" programme, we have been granted a Cardio-Protected Space certificate due to the fact that we are equipped with:

1. Approved defibrillators carrying the CE marking.
2. Properly installed and signposted (ILCOR signage).
3. Personnel have been trained and approved according to the legislation which applies.
4. Having a maintenance service.
5. Registration at the regional authority registry.
6. Having all the elements required by the regional authority.
7. Being equipped with a certain number of defibrillators that allow us to act within a response time of five minutes.



United Nations Global Compact

By means of its endorsement of this initiative, which over 13,000 entities around the world have joined to date, the Group has strengthened its commitment to the Ten Principles that are universally accepted in the areas of human rights, labour standards, the environment and combatting corruption. It has also allowed measures to be adopted that are aligned with the United Nations' goals, which are presently set forth in the Sustainable Development Goals (SDGs).

Joining the United Nations Global Compact is added to the Group's membership of several initiatives that has been consolidated in recent months, such as Lean & Green, which is aimed at reducing the Group's emissions by 20% within five years; becoming the first vehicle fleet to have been granted Ecological Fleet Accreditation by the Spanish Association of Fleet and Mobility Managers (AEGFA); founding the Region of Murcia Sectorial Green Hydrogen Association (AHMUR) in conjunction with other companies and entities; or being a member of the Biodiversity Partnership Mesoamerica (BPM) management board. These are just a few examples aimed at attaining the goal of the Group's total decarbonisation by 2030.

Recognition of the Primafrío Chair at the UMU

Following a business strategy in innovation, the company promotes research and development (R&D) to speed up progress towards new technological models that increase its processes' efficiency, automation and safety in order to offer a service that meets all quality standards while at the same time respecting the environment. In order to achieve this, it has established several strategic alliances like the one it has established with the University of Murcia through the Primafrío Chair.

This chair is focused on research, training and teaching in the field of road logistics. It serves to carry out projects and conduct research studies, promote training actions like Master's degree programmes and courses in Spain and abroad, foster R&D and innovation activities and training, as well as in-company internships which promote equality. Through this chair, Primafrío has positioned itself as a company that is committed to training and innovation in all areas, especially the university area, in order to strengthening the Region of Murcia's technology and industrial ecosystem.



Primafrío Foundation

Primafrío Foundation

We are a Group that is close and committed to society, especially in the communities in which we have a presence. We contribute to their development with our way of doing things and the initiatives we carry out.

In the over fifty years that the Primafrío Group has been transporting goods along the roads of Spain and Europe, a concern for promoting entrepreneurship and the social economy have gradually permeated the company.

As response to this concern, the Group has carried out socially responsible actions throughout its history. These culminated in the setting up of the Primafrío Foundation in 2018, a non-profit organisation set up by the Primafrío Group aimed at providing a response to the social, economic and environmental challenges facing society through innovative proposals.



Social action

Collaboration in our social surroundings



Monetary donation to the **Jesús Abandonado Foundation**



30X15 CHALLENGE involving the donation of medicalised ambulances to Ukraine



Participation in solidairy races by the organisation's team of volunteers



Collaboration with the Paddle Tournament against Cystic Fibrosis



Collaboration with the 8th Race against Pancretic Cancer

Fostering sport in the Region

Agreements with clubs in the region dedicated to different disciplines in order to back sport, its values and its sustainability.

The Primafrío Group seeks to foster physical activity and promote the values represented by sport. In doing so, the principles of equality, inclusion and respect for the environment are upheld, thereby favouring inclusive sport that is respectful to the environment.



Collaboration in the "Levante Cup 2022" football tournament



Sponsorship of the Region of Murcia Cycling Tour



Collaboration with projects that encourage the circular economy



Green points installed along the Murcia Cycling Tour's route



Culture

Primafrío Foundation in figures

Throughout our recent history, we have carried out several projects whose main results have been as follows:

RESEARCH

We have taken part in two scientific research programmes in conjunction with prestigious public and private centres.



SUPPORT TO ENTREPRENEURSHIP AND THE SOCIAL ECONOMY
Collaboration with two entrepreneurship projects which link the circular economy and social insertion.



SPORTING EVENTS

Participation in renowned competitions and congresses, such as the Region of Murcia Cycling Tour, the Levante Cup, the ITF World Tennis Tour and the city of Murcia Eight-a-Side Football Tournament.



ACTIVITIES FOR SENIOR CITIZENS

We promote and participate in activities that improve our senior citizens' quality of life.



PARTNERSHIP WITH SOCIAL ENTITIES

Participation in solidarity events with over ten entities, as well as donations to institutions for their social actions.



COLLABORATION WITH SPORTS CLUB AND ASSOCIATIONS

We collaborate with a variety of entities, giving support to over 1,500 sportsmen of the Region.



Social Commitment

Social Commitment

Responsible supply chain management

[GRI 308-1] [GRI 414-1]

Primafrío Group is firmly committed to the development of the Spanish economy and its area of influence. Proof of this is that Spanish suppliers accounted for 94% of all the suppliers contracted by the company in 2022.

The remaining 6% were suppliers from the European Union.

The Primafrío Group divides its suppliers into direct suppliers (suppliers related to the activity's running costs) and indirect suppliers (suppliers related to the structural costs). Fuel suppliers, vehicle maintenance providers and subcontracted logistics providers offering us reinforcement at certain periods of time due to high demand volumes are included among the direct suppliers.

The Group extends fulfilment of its values to the supply chain through the Suppliers and Subcontractors Code of Ethics, as well as by continuously overseeing and monitoring all its suppliers in matters connected with regulatory compliance and ESG criteria.

Due to its geographical scope and the nature of its activity, the Primafrío Group considers that none of its main suppliers is at significant risk of failing to fulfil these requirements.



Suppliers and Subcontractors Code of Ethics

The purpose of the Suppliers and Subcontractors Code of Ethics is to **promote among all the Primafrío Group's suppliers, contractors, subcontractors and collaborators** knowledge about its Mission, Vision, Values, ethical principles and crime prevention policies in order to create a link and set out some guidelines for action that are in keeping with the principles and values which form an integral part of the Primafrío Group's commitment to social development and environmental sustainability in the communities in which it acts.

The **Primafrío Group's Mission, Vision and Values** are the bases of its ethical principles and are included as part of the document. Furthermore, a catalogue of forbidden conducts and a recommended action protocol to prevent criminal risks are included as appendices to said document.

The Primafrío Group considers that it is of utmost importance to work with suppliers and subcontractors which run their companies according to the same ethical principles as those to which the Primafrío Group is committed, considering that they form an essential part of its corporate culture.

The Primafrío Group sets out the guidelines for conduct, integrity and ethical behaviour, along with the responsibilities involved in working with the Primafrío Group, in the Suppliers and Contractors Code of Ethics. It requires its suppliers and subcontractors to accept and make a commitment to observing the Group's Mission, Vision and Values beyond strict fulfilment of the legislation which is currently in force.

To sum up, the Primafrío Group expects all its suppliers, employees and, where appropriate, its subcontractors to conduct themselves with the highest degree of honesty, equity and personal integrity.

It is essential for all of the Primafrío Group's suppliers and subcontractors to understand and apply the Code of Ethics, along with its appendices, and to observe the highest possible ethical principles, since the success of any business venture that may jointly be done with them resides in this aspect.

Environmental assessment and monitoring of suppliers and subcontractors

In accordance with its commitment to responsible supply chain management and in consonance with the ethical values set out by the Group that are required from its suppliers and subcontractors, the Primafrío Group continuously assesses and monitors them on an internal digital supplier documentation platform.

All the documentation required by the Group from its suppliers and subcontractors to properly fulfil the legislation which is in force and the Group's ESG criteria is managed on the platform. The documentation set out below is also monitored, controlled and assessed on said platform:

- ✓ ISO 9001 Quality Management System Certificate
- ✓ ISO 140001 Environmental Management System Certificate
- ✓ IFS Logistics Quality Certificate.

Consumer health and safety measures
[GRI 416-1] [GRI 417-1]

In keeping with its commitment of offering the best possible service and always respecting the environment and society, quality is always a basic premise for the Primafrío Group.

Quality assurance standards



Good Distribution Practices Certificate for medicines for human use (GDP).



Road Transport Certificate for food products at ambient or controlled temperature (IFS).

The effectiveness of these programmes is assessed by independent experts on a regular basis.

Importance of tractor unit and cooling equipment maintenance

Vehicle maintenance procedure: The aim of this procedure is to set out the system used to detect, identify, carry out, record and monitor vehicle maintenance and control activities.

Other quality measures

- HACCP (Hazard Analysis and Critical Control Point) System, which ensures maximum food logistics quality by controlling and analysing critical hazardous points.
- Cold chain control plan. This plan aims to ensure the cold chain is maintained from the product's introduction into the vehicle until it is started up.
- Transport and storage good practices plan.
- Non-conforming product withdrawal procedure.
- Food defence: Its purpose is to define the system and responsibilities set out by the Group for the management of the company's Food Defence in order to assess the possibilities of internal and external sabotage in the company.
- Trailers fitted with state-of-the-art temperature control devices fitted with an alarm system that make it possible for the cold chain to be maintained as an essential factor for food safety.
- Quality audits conducted by customers.

Customer service

The company's commitment to customer satisfaction is reflected in the sensitivity and attitude of all Primafrío Group employees. Providing an outstanding top-quality service and going one step beyond needs is a key factor for the customer feeling cared for and placing their trust in the Group

A total of 66 customer complaints were received in 2022, all of which were favourably resolved

Complaints management	Immediate solution	High customer satisfaction
<ul style="list-style-type: none">• Complaints procedure: A system has been set up to properly manage, resolve and control customer complaints.• This procedure applies to all complaints made by customers, regardless of whether they are justified or not.	<ul style="list-style-type: none">• The Primafrío Group has a specific Incident Resolution Department.• Incidents are resolved immediately for all customers.	<ul style="list-style-type: none">• Surveys conducted on an annual basis (carried out between 11/05/2022 and 20/05/2022).• The overall satisfaction level obtained a score of 9.26 out of 10.• Said score was obtained from the responses of 240 customers.• Our customers consider that Primafrío kept up its services' quality levels during the pandemic.

Tax and transparency reporting

[GRI 201-1] [GRI 201-4]

The Primafrío Group is committed to fulfilling tax legislation and meeting its tax obligations. It encourages a cooperative relationship with the Tax Agency and considers that the contribution made to economic and social development resulting from the tax payments it makes in all the territories where it operates is relevant.

The Primafrío Group's commitment to fulfilling its tax and social security obligations is set out in its Code of Ethics. All relevant facts as far as taxes are concerned are stated in tax returns. Likewise, any conduct aimed at avoiding tax obligations or obtaining benefits to the detriment of Public, State, Regional or Local Tax Agencies or the Social Security System are forbidden.

The Primafrío Group and the companies which comprise it undertake to ensure the truthfulness of any applications they make for public subsidies and to use such subsidies for the purposes for which they were granted.

Preparation of the Consolidated Non-Financial Reporting Statement

This Consolidated Non-Financial Reporting Statement forms an integral part of the consolidated management report of Primafrío Ibérica Group, SL. and its subsidiaries for the year 2022 and was prepared in Murcia on 31 March 2023.

Said Consolidated Non-Financial Reporting Statement has been signed by the Executive Chairman of the Board of Directors of Primafrío Ibérica Group, S.L., who signed this sheet as proof of identification:

Primafrío, S.L.

Represented by Mr. Jose Esteban Conesa
Alcaraz
Director of the Board



Non-Financial Reporting Statement 2022