

# Statement of Non-Financial Information 2022



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NOUCOR



David Perdigó / CEO

## I. Letter from the CEO

In our commitment to the reporting of non-financial information, which is applicable, for the first year, to the group formed by Noucor Group S.L. and its subsidiaries (hereinafter Noucor), we wish to comply with the requirements of Law 11/2018 on Non-Financial Information and Diversity through this report, which includes our commitment to **sustainability** and information relating to the impact of our activity on environmental, social and labour issues, respect for human rights, and matters related to the prevention of corruption and bribery, among others.

The information disclosed on these material issues, both for Noucor and for our stakeholders, corresponds to the indicators of the Global Reporting Initiative's Sustainability Reporting Standards (GRI standards).

In line with this commitment to **responsible business**, in July 2022 the Board of Directors approved the **Code of Ethics**, which represents the framework where our ethical, environmental and social principles are established, and which in turn is the basis for the development of different corporate policies, procedures and action plans, along with our responsibilities, to ensure their effectiveness and compliance.

As a pharmaceutical company, we focus our work on innovation to develop the highest quality active ingredients, medicines and food additives that can reach the maximum number of people around the world to improve their health and quality of life, while contributing to the challenges of sustainable development and the 2030 agenda.

Globally, 2022 has been a year marked by tremendous challenges, such as climate change, resource scarcity, supply and commodity prices, rising inequality, and social and geopolitical instability.

For us, this has been the first year, as Noucor Group, where we have been able to launch with our own values and culture, combining almost two centuries of experience and knowledge with a clear innovative vocation and a commitment to people, customers, innovation and the environment, and all this with a strong commitment to generate value in the environment in which we operate, integrating ESG criteria in our decisions to ensure the sustainability of our business in the long term.



As a pharmaceutical company, we focus our work on innovation to develop the highest quality active ingredients, medicines and food additives that can reach the maximum number of people around the world to improve their health and quality of life.

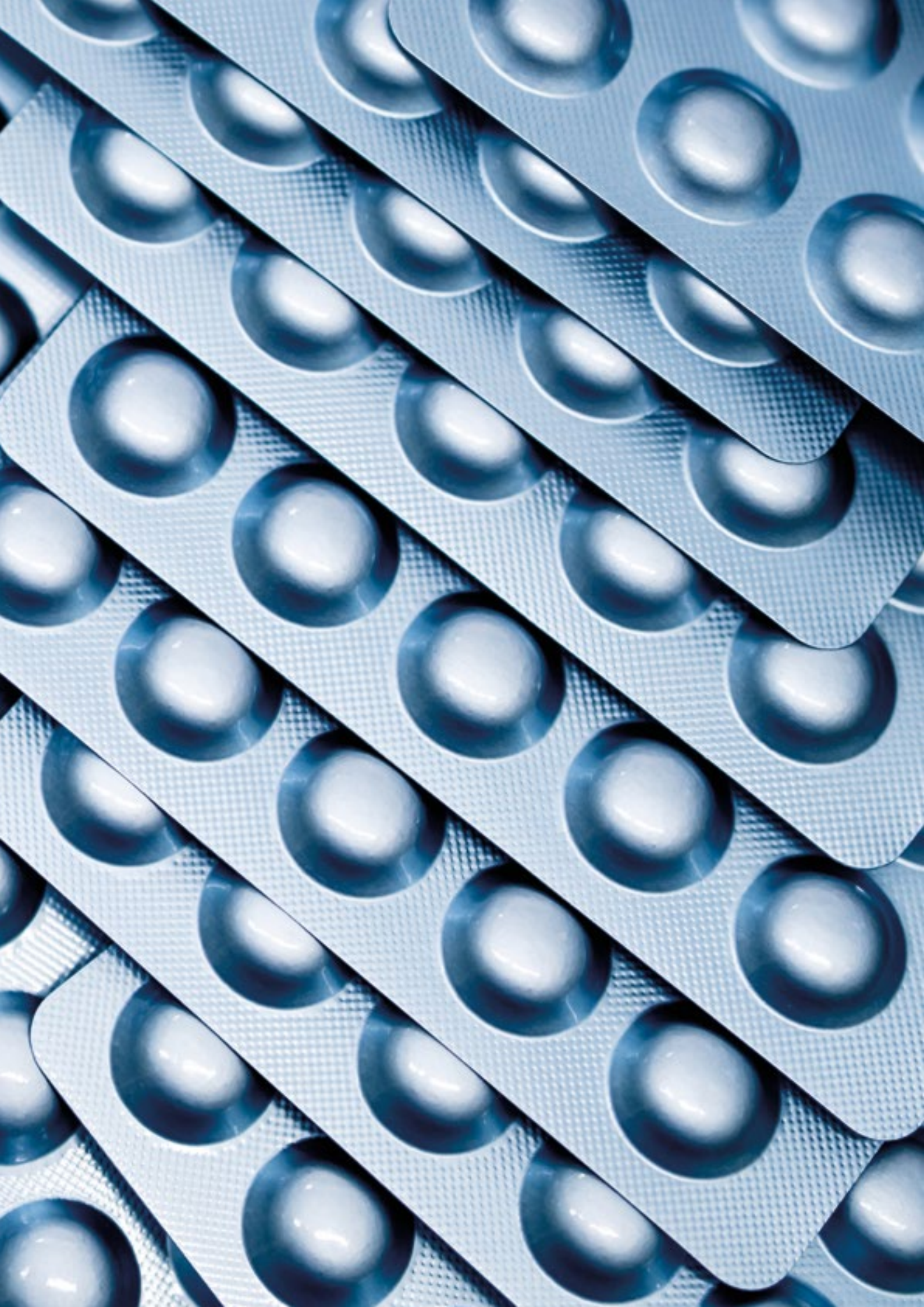
We are very satisfied with the results of this first year of Noucor, which has been marked by **good economic results** that will allow us to continue innovating and to tackle new business and growth opportunities. Rumatadine has reached new **strategic markets such as China**, the second largest potential market for antihistamines in the world, behind only Japan, and a market that is difficult to access and very protectionist, but in which the quality of the drugs is increasingly valued. Moreover, Rumatadine has established itself in key markets such as **Japan** (where it already has the second largest market share in antihistamines), **Canada and Europe**, demonstrating Noucor's strong ability to compete in the international market.

We have made significant investments in **environmental** projects. Thus, in 2022 I would like to highlight the **installation of more than 4,000 solar panels** to reduce our carbon footprint and the 45% reduction in water consumption at the Palau-Solità i Plegamans facilities and the first investments in an ambitious environmental improvement project at Urquima, our chemical plant, which will involve a total investment of EUR 6.2M over the next few years and which has the approval of Next Generation funds.

With regard to **people**, in 2022 we have made a commitment to the physical and emotional wellbeing of people with the Wellness Plan and the BH Wellbeing Programme.

I cannot finish without thanking all the professionals who make up the Noucor Group for their dedication and effort to achieve these results, as well as the support and trust of all the shareholders and investors for backing this project, which brings great value to society with the high quality products we manufacture.

In the context of the transparency in which we operate, I invite you to view the detailing of our initiatives and the results of the projects carried out in 2022 at Noucor, which are set out in this Statement of Non-Financial Information.



## 2. Features of the report

The consolidated Statement of Non-Financial Information forms part of the Management Report of Noucor Group S.L. and its Subsidiaries and has been prepared in line with the requirements of **Law 11/2018, of December 28, on non-financial information and diversity**, which amends the Commercial Code, the revised text of the Capital Companies Act approved by Royal Legislative Decree 1/2010, of July 2, and Law 22/2015, of July 20, on auditing of accounts, with regard to non-financial information and diversity.

The Non-Financial Information Statement presented below shows the information and data for the financial year beginning on January 1, 2022 and ending on December 31, 2022 of **Noucor Group, S.L. and its subsidiaries** (hereinafter referred to as Noucor) and was prepared together with the annual accounts at the ordinary meeting of the Board of Directors held on March 29, 2023.

Within this framework, through this document, Noucor complies with its duty to report on **environmental, social, economic, personnel, human rights and community impact matters** relevant to the organisation in the development of its activity.

For the purposes of the Statement of Non-Financial Information, Noucor Group S.L. and all its subsidiaries are considered as Noucor. In the case of **data relating to the environment**, they are reported at the closing date of 31/12/2021 and correspond solely and exclusively to the Palau-Solità i Plegamans and Sant Fost de Campsentelles production centres, as Noucor's main impacts on these issues are mainly produced at these facilities.

Company	CNAE	NIF	Operational Management
<b>Noucor Group SL</b> (consolidating holding company)	6,920	B06829485	
Noucor Health, S.A.	2,120	A63279152	Avinguda Camí Reial, 51-57 08184 Palau-solità i Plegamans (Barcelona - SPAIN)
Biohorm, S.L.	219	B60403797	
Palau Pharma, S.L.	219	B59730374	
Urquima, S.A.	2,110	A08918369	C/ Arnau de Vilanova, 20 08105 Sant Fost de Campsentelles (Barcelona - SPAIN)

Information on **issues related to social, economic, personnel, human rights and community impact** is provided for all companies, and with reference to the full reporting exercise of this report.

For the preparation of this **Statement of Non-Financial Information**, the guidelines and requirements for the preparation of reports have been followed using as a reference the standards of the **Global Reporting Initiative (GRI Standards)** in their current version:

- To publish a GRI table of contents
- To provide a statement of use
- To notify GRI of the use of the standard as a reference for the preparation of this report, please send an email to the following address: [reportregistration@globalreporting.org](mailto:reportregistration@globalreporting.org)

To determine the **content** and give an overview of the most significant impacts on the economy, the environment and people, the criteria established by GRI have been used as a basis:

- Stakeholder engagement
- Materiality Analysis

In addition, the GRI principles have been applied to ensure the **quality of the information** and the correct presentation of the information covered in this Report:

- Accuracy
- Balance
- Clarity
- Comparability
- Comprehensiveness
- Context of sustainability
- Timeliness
- Truthfulness



## The Non-Financial Information Statement presented below shows the information and data for the financial year beginning on January 1, 2022 and ending on December 31, 2022 of Noucor Group, S.L. and its subsidiaries

This consolidated Non-Financial Information Statement of Noucor is the Group's first Annual Report together with its consolidated annual accounts, which will henceforth be prepared on an annual basis.

The information in this statement of non-financial information has been verified in accordance with ISAE Standard 3000, with limited assurance scope, by EQA as an independent assurance service provider in accordance with the law.

If you have any concerns or questions regarding this report and its contents, please send an e-mail to the following address: [info@noucor.com](mailto:info@noucor.com)





nouCOR

# urquima



**Urquima**

a NOUCOR company

Seguridad & Recepción

Edif. Oficinas

Edif. Producción

Taller Mecánico

Depuradora

Planta Piloto

Taller Eléctrico

Comedor

Almacén Logística

Salida Camiones

**urquima**

a NOUCOR company

Edificio Planta

Edificio Oficinas & S&D

Servicio Mecánico

Depuradora Producción & S&D

Deposito S&D

Almacén & Montacargas



# 3. About Noucor

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## 3.1 Our history

Noucor was established at the end of 2021 when a group of investors, led by the private equity firm MCH, acquired the entire B2B business of the Uriach Group, with the commitment to improve people's health and quality of life by contributing to a more sustainable world.

Noucor is a recently created chemical-pharmaceutical group, but with an extensive track record of almost two centuries in the sector, with a business focused on R&D, licensing, manufacturing and supply of pharmaceutical products. Noucor was created with a clear international vocation, committed to research and alliances as levers for innovation and growth, and with the vision of becoming a trusted strategic partner at the international level for the development of pharmaceutical products with high added value and of the highest quality to meet the health needs of the world's population.

Noucor bases its international development and expansion on a firm commitment to the highest ethical standards and strict compliance with GMP standards and regulations in all countries and markets in which it operates.

Noucor's value proposition is based on innovation, talent and excellence in customer service, promoting the development of products adapted to their needs and accompanying them with close collaboration. Noucor is headquartered in Palau-Solità i Plegamans (province of Barcelona), and currently has two centres of activity:

1. Headquarters, pharmaceutical and food supplements plant and R&D&I centres in Palau-solità i Plegamans (Barcelona, Spain).
2. The chemical plant, Urquima, in Sant Fost de Campsentelles (Barcelona, Spain).

Noucor has an international presence in more than 100 countries, and its activities are therefore subject to a variety of socio-economic environments and regulatory frameworks, as well as to different risks inherent in the operations and the complexity of the products/services it offers.

Noucor focuses on the development and marketing of innovative products and generic products. Throughout 2022, Noucor's flagship product, Rupatadine, has reached target markets such as China, Saudi Arabia and the United Arab Emirates, and has consolidated its position in key markets such as Japan and Canada, where it already has the second largest market share in antihistamines, demonstrating Noucor's strong ability to compete in the international market.

Noucor has more than 20 R&D projects, 8 approved patents, 7 preclinical studies, 60 approved DMFs and 51 approved dossiers. International sales account for approximately 57% of the business, which is endorsed by the most important companies in the international pharmaceutical sector.

Noucor's vision is to continue to grow internationally and to consolidate its position in existing markets.

Thanks to the efforts of its 460 employees and the trust of its customers, Noucor is positioned as a leading company in the chemical-pharmaceutical sector, both in the manufacture and marketing of active pharmaceutical ingredients and in the marketing of medicines and food supplements.



### 3.2 Noucor's activity

Noucor's activity is focused primarily on three areas:

1. Manufacture of Generics (API, Active Pharmaceutical Ingredients) and marketing of generic dossiers.
2. Development and licensing of innovative products (NCEs, New Chemical Entities)
3. Development and manufacturing for other companies (CMO-Contract Manufacturing).

Noucor's vocation as an international company and its firm commitment to R&D&I, as well as the great importance given to the quality of its products, processes, and services, is a constant in the performance of Noucor's activities and an unwavering objective for the future, forming an integral part of the Group's culture and way of operating.

Noucor focuses on new processes that are scalable, efficient, safe and environmentally friendly, from manufacturing grams to hundreds of kilograms, using everything from classical process chemistry technologies to the most advanced technologies and methodologies.

As of December, Noucor companies have more than 70 scientists of their own, in addition to multiple collaborations with external scientific centres, focused on research and development of products and process improvement, for continuous improvement and operational excellence.

Noucor regularly receives visits and audits from different administrations and regulatory agencies, as well as from its partners and customers, in the fields of quality, safety, health and environment.

Noucor works under strict GMP guidelines and is regularly inspected by the world's leading health authorities, earning a favourable rating.

Noucor works with the highest Safety, Health and Environmental standards, obtaining and renewing certifications in all its facilities. In 2022, the first follow-up audit of the Health, Safety and Environment Management System certified in accordance with ISO 45001:2018 and ISO 14001:2015 standards was carried out by TUV Rheinland, with a satisfactory result.

Noucor supports partnerships and has numerous collaborations and ongoing projects with various universities and research organisations both nationally and internationally. Among others, Noucor is a member of DCAT (Drug, Chemical & Associated Technologies Association, an international non-profit organisation that brings together companies involved in the biomedical industry) and the IQS Foundation (an entity that, among other objectives, promotes the development and dissemination of scientific knowledge).

Noucor is also a member of several federations and associations of companies in the sector, such as AFAQUIM, FEDEQUIM, AESEG, FEIQUE, CataloniaBio&HealthTech, CEJE and ANEFP.

#### **Mission, vision and values**

Noucor's **mission** is to turn all its knowledge and expertise into high quality products and reliable solutions for the healthcare ecosystem, working in close collaboration with its customers and suppliers.

Noucor's **vision** is to be the trusted strategic partner in the B2B (business to business) market for the development of pharmaceutical products with high added value, and with the maximum guarantee of quality to meet the health needs of the world's population.

The **values** that define Noucor are as follows:



Noucor's value proposition is based on innovation, talent and excellence in customer service

## Innovation

*"We reinvent ourselves to keep building"*

## Commitment

*"We believe in what we do, and we deliver"*

## Trust

*"We trust in people"*

## Passion for the Customer

*"Passionate about our customers"*

## Unity

*"Together for the same goal"*

### 3.3 Business Strategy and Corporate Governance

Noucor has established its governance framework for the development of its business strategy, focused on the achievement of a strategic plan 2021-2030, which has as its main objective the international growth of Noucor's current business and positioning it at the forefront of the chemical-pharmaceutical sector.

The highest governing body is the **General Meeting of Shareholders**, made up of all persons with a shareholding in Noucor.

The senior management of the group is entrusted to the Board of Directors, which has full authority to administer and represent Noucor in the development of the activities that make up its corporate purpose.

The **Board of Directors** consists of 7 members, one of whom is independent.



The Group's organisation has 462 employees.

The **executive management** of Noucor is entrusted to a Management Committee, led by the Group's **CEO**, David Perdigó, who assumes responsibility for the achievement of the objectives set annually, as well as the implementation of the Strategic Plan, in accordance with the values and global policy of the Company.

The members of the **Steering Committee** are tasked with developing and implementing the Strategic Plan, achieving the approved goals, objectives and budgets, through the leadership of their teams and in accordance with Noucor's values and global policy.

The Steering Committee consists of the CEO and 6 other members, 4 men and 3 women:

- **CEO:** David Perdigó  
*Chief Executive Officer*
- **CCO:** Maria José Rojo  
*Chief Commercial Officer*
- **CFO:** Daniel Gutiérrez  
*Chief Corporate Services Officer*
- **CQ/EHSO:** Isabel Vallès  
*Chief Quality, EHS & Sustainability Officer*
- **CSIO:** Montse Chavalera  
*Chief Strategy & Innovation Officer*
- **CPO:** Josep Pérez de Tudela  
*Chief People & Communication Officer*
- **COO:** Jordi Ravanals  
*Chief Operating Officer*

As of December 31, 2022, the Group's **organisation** has 462 employees. Responsibility for **sustainability** management rests with the CEO, who communicates to the members of the Steering Committee the goals and objectives set, periodically reporting their concerns and results on material issues to the Board of Directors.

### 3.4 Commitment to Sustainability

Noucor has incorporated sustainability into its business strategy as a basic principle in order to contribute, with a long-term vision, to the development of the Group's businesses and sustainable development, integrating environmental, social and ethical criteria into its decision-making process, in addition to economic variables.

Noucor's purpose is aimed at generating shared value for society and the planet and is governed by consistency with its values and based on the ESG (Environmental, Social and Governance) criteria identified in the materiality framework and framed in its four management principles:

- Responsible business
- Commitment to health and wellbeing
- Commitment to people
- Commitment to the environment.



### Dialogue with stakeholders

Noucor identifies its strategic priorities taking into account the concerns and expectations of its stakeholders, obtained through dialogue through different channels, depending on the stakeholder group.

The Principal Stakeholders Identified are:

- Shareholders
- Investors and banks
- Workers
- Partners
- Customers/competitors
- Suppliers and contractors
- Public administration and regulatory agencies
- Business partnerships
- Society
- The media

Noucor reviews, prioritises, discusses, responds to and incorporates the results of the dialogue with these stakeholders in the materiality process. The results of this are documented, reported to the CEO and taken into account for managing the key aspects

for the strategy and for the disclosure of the results in this report, which is approved by the Board of Directors.

During 2022, surveys were conducted among different groups inside and outside the organisation, as well as an exhaustive benchmarking and analysis of sustainability trends, with the aim of identifying and prioritising the most relevant issues related to sustainability.

In addition, sustainability training has been initiated for the entire workforce, which at the time of writing this report is still in progress. The entire organisation is expected to be formed in the first half of 2023.

**Materiality**

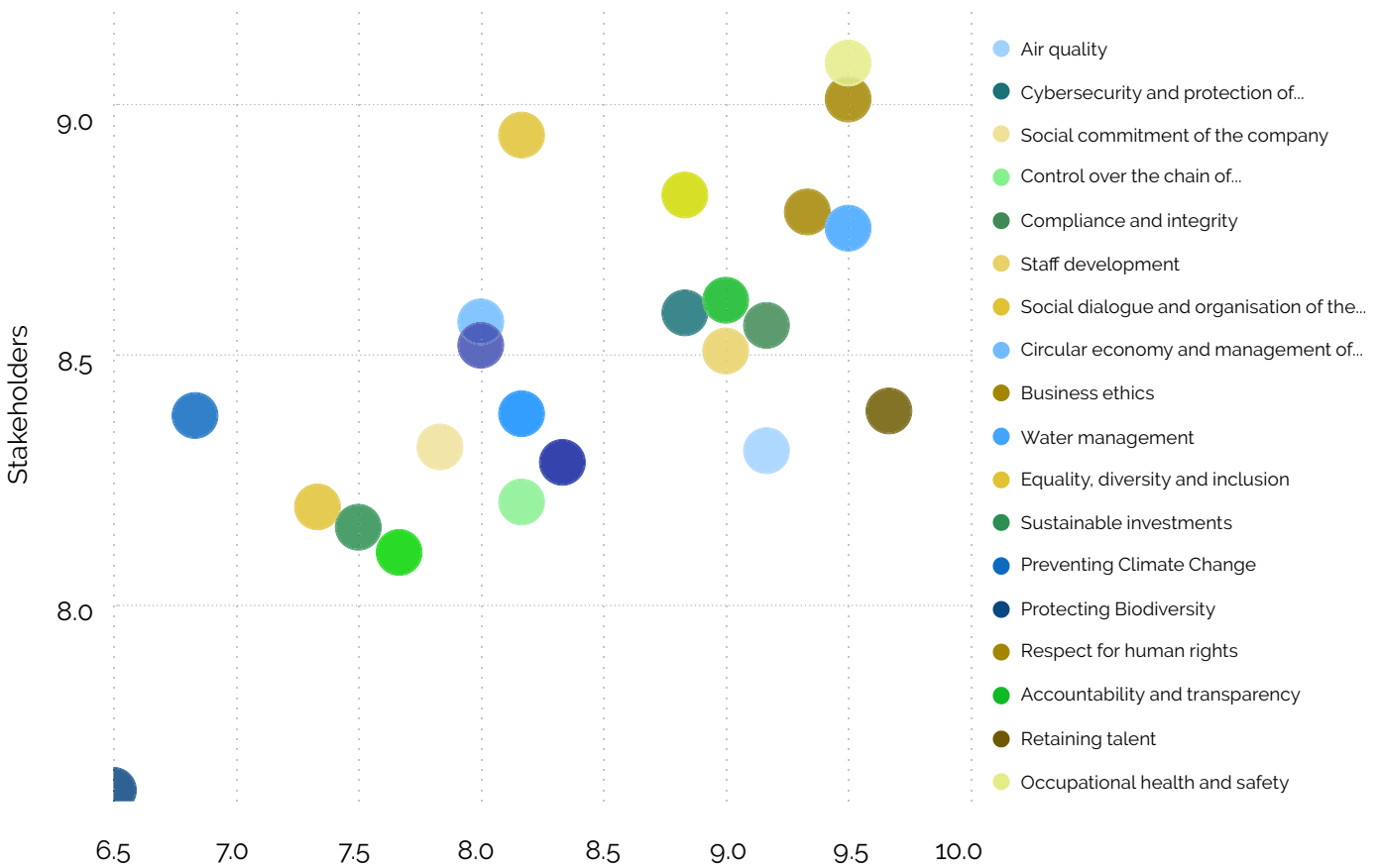
Noucor conducted its first materiality analysis in 2022. **Materiality** is one of the most important requirements for the preparation of the sustainability report following the international accountability standards of the Global Reporting Initiative "GRI", referenced in Law 11/2018 on Non-Financial Reporting and Diversity.

The **Materiality Analysis** carried out has made it possible to identify the sustainability issues with potential economic, social and environmental impacts that are material for Noucor, as well as to ascertain the assessment made both by the Group itself and by the different stakeholders on these identified issues.

The **result of the 2022 Materiality**, based on this internal and external relevance, is a table showing the 23 strategic priorities for the effective integration of sustainability as a lever for competitiveness and value creation for all stakeholders.

The relevant aspects obtained in the materiality framework are presented graphically below.

**List of Noucor 2022 material issues**  
 Materiality Framework







**Contribution to the Sustainable Development Goals (SDGs)**

In the context of sustainability, since the United Nations approved the 17 Sustainable Development Goals (SDGs) in 2015, Noucor has integrated these goals into its commitments as part of its responsibility, contributing to the achievement of these goals and aligning itself with the international sustainability agenda.

The 17 Goals bring together 169 concrete targets and constitute a common sustainable development agenda for governments, civil society and the private sector. Noucor's activities contribute directly to the achievement of the following SDGs that have been identified as priorities and that respond indirectly to the other SDGs:



**SDG 3 (health and well-being)**

We contribute to this goal through our products, bringing them to as many people as possible to meet their health needs.

- Product quality and safety
- Innovation
- Research
- Collaboration
- Internationalisation



**SDG 8 (Dignified work and economic growth)-**

This goal is contributed to by promoting quality employment, developed in a safe, healthy, diverse, inclusive and supportive work environment.

- Career and talent development
- Equality, diversity, inclusion and non-discrimination
- Occupational safety, health and welfare
- Ethics, compliance and Code of Ethics
- Organisational culture



**SDG 12 (Responsible production and consumption)**

We contribute to this goal through our responsible business model, as well as through good management of impacts, risks and opportunities.

- Responsible use of consumables and resources
- Promoting the circular economy
- Value chain collaboration
- Maximum efficiency and minimum negative impact
- Care and protection of the environment
- Transparency



**SDG 16 (peace, justice and strong institutions) and SDG 17 (partnerships to achieve the goals)**

We contribute to these goals through ethical and responsible management, and by fostering collaboration with partnerships that enable us to develop our commitment to sustainability globally. Noucor's code of ethics establishes its principles and commitments for action and relationships, both internally and externally, and includes the interests of the people who work with the Group, its clients, health and labour administrations, as well as the community that encompasses the whole of society.





# 4. Responsible Business

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Noucor is committed to maintaining an ongoing dialogue that builds trust with its stakeholders. Corporate decisions are made within a corporate governance framework incorporating sustainability as a fundamental part of Noucor's long-term vision. The Group acts ethically, responsibly and transparently on the basis of its Code of Ethics and extends this way of working to its entire value chain.

Noucor understands responsible management as ethical, transparent and responsible behaviour towards stakeholders, respect for human rights and the fight against all types of corruption, all of which are essential to ensure the Group's long-term sustainability.

Noucor has:

- Code of Ethics and internal regulations that develop its principles
- Economic, ethical, social and environmental policies
- Due diligence procedures, plans and initiatives
- Control mechanisms

Together, these elements reflect the Group's standards and principles to ensure responsible and effective management.

The Corporate Governance System ensures compliance with all these procedures and policies.

On July 14, 2022, the Board of Directors approved Noucor's Code of Ethics and Compliance Framework Policy, and appointed the Compliance Committee as the body in charge of ensuring good corporate governance.

Subsequently, training in the Code of Ethics was given to all Noucor employees, who signed a document of adherence to the Code of Ethics and all the internal regulations that develop its principles.

The Compliance Committee is currently working on the drafting of internal regulations that will enable the prevention and proper management of all the compliance risks to which Noucor is or could be exposed.

## 4.1 Identifying and managing risks

Noucor proactively manages risks, which enables it to identify, measure and manage them in order to ensure the achievement of business objectives, minimisation of impacts, protection of assets, people and the environment, and thus ensure the Group's long-term sustainability.

All risks that could have a significant impact on the achievement of the Group's objectives are assessed on a regular basis. The risk factors to which Noucor is exposed include:

- **Financial risks**, relating to the exposure of results and equity, to changes in prices and other market variables, such as exchange rates, interest rates, commodity prices and financial asset prices, among others. There is also credit risk, arising from the possibility that a counterparty to Noucor may fail to meet its contractual obligations and result in an economic or financial loss to the company.
- **Strategic risks**, defined as the uncertainty as to the behaviour of inherent business variables, such as the characteristics of demand, the supply of raw materials and the emergence of new competing products.
- **Operational risks**, referring to direct or indirect economic losses caused by inadequate internal processes, technological failures, human error or as a consequence of certain external events. Operational risks also include legal and fraud risks and risks associated with information technology and cybersecurity (cyber-attacks or security incidents that allow access to confidential information or cause a disruption of business activities).
- **Compliance risks**, arising from regulatory changes established by the various regulators or changes in social, environmental or legal regulations. These risks include possible criminal risks due to the potential liability of the company's directors and executives and the company itself, as well as risks arising from the potential negative impact associated with changes in the perception of different stakeholders. Noucor is aware of the

reputational impact that could arise if attitudes or behaviour contrary to existing anti-corruption and anti-bribery regulations were to emerge within the company or among its main business partners, and has sufficient internal mechanisms in place to prevent and mitigate these risks.

Within the framework of the **management systems of the different operational areas**, Noucor reviews the evolution and trends of the legal requirements that apply to it and of the material issues that it identifies in the materiality framework, regarding social, environmental, human rights, anti-corruption and bribery, cybersecurity and those related to society in general. Non-legislated material issues are assessed and managed according to international frameworks.



The Group acts ethically, responsibly and transparently on the basis of its Code of Ethics and extends this way of working to its entire value chain.



The following are the policies and control measures implemented at Noucor to reduce the risks identified:

Scope	Risk	Management and main policies and Management Systems in place
<b>FINANCIAL</b>	Economic performance and solvency	Audit report on the annual accounts issued by an independent auditor. Anti-corruption policy, which is present in all Noucor's actions and is mandatory for all the Group's employees.
	Failure to achieve expected growth and missed business opportunities	Business model based on research, quality and alliances with sustained growth and long-term vision. Organic growth and strategic investments or divestments.
<b>STRATEGIC</b>	Efficiency of the organisational structure	Cross-cutting corporate organisational structure that promotes synergies and leveraging of resources and capabilities.
	Bad practices of workers or other stakeholders	Code of Ethics People Policy Framework Compliance Channel
<b>OPERATIONAL</b>	Health and Safety of employees and business continuity	Occupational Health and Safety Policy and Management Systems ISO 45001 certified by external accredited body, internally and externally audited on an annual basis BCP and its regular reviews.
	Environmental aspects of the activity	Environmental policy and Environmental Management System based on ISO standard 14001 certified by an external accredited body, internally audited and externally on an annual basis.
	Digitalisation, robotisation, cyber security and safety of information	Information Security Policies and Plan. Regulatory compliance, employee training and awareness-raising to ensure detection and management of cyber-attacks and privacy breaches, intellectual property and confidentiality of information.
	Recruitment and retention of talent	HR Framework Policy and Human Resources management model. The talent and development of the workforce is a priority for the development of Noucor's business, therefore policies are being developed that ensure their development: – Recruitment and promotion policy – Welcome plan – Training and development policy – Performance assessment – Organisational climate – Telework policy – Wage policy
	Marketing of defective products	Quality Policy and Quality Management System ISO 9001 certified by external accredited body, internally and externally audited on a regular annual basis. GMP's. Implementation of the requirements of individual authorities and agencies in each country where Noucor operates.
	Bad practices in the supply chain	Code of Ethics. Assessment of supplier sustainability.
	Non-compliance with the current regulations or of the ethical principles Derived from regulatory changes established by the various regulators or changes in ESG regulations. Lack of transparency	Crime Prevention and Compliance Model. Code of Ethics and the Compliance Channel. OSH Management System. Environmental Management System. Quality Management System. Audited Annual Report and Statement of Non-Financial Information. Transparency on the web.
<b>COMPLIANCE</b>		

Noucor studies and analyses in depth its relations with:

- 1) **Public administrations** for any reason related to the Group's activities: Recepción y gestión de inspecciones por parte de distintas autoridades.
  - Reception and management of inspections by different authorities.
  - Obtaining authorisations and licences related to the Group's activities.
  - Underwriting and signing of public contracts.
  - Application for grants and public funds.

Within the framework of the Anti-Corruption Policy, Noucor approved the Protocol of Conduct with Public Administrations, which regulates the relationship between employees and Public Administrations.

- 2) The **management of the processes of contracting works and services with third parties**, mainly related to the activities carried out by the Group, by incorporating these aspects in the framework Purchasing Policy.
- 3) Entering into **donation agreements with public and private entities** through the Donations and Sponsorship Protocol approved by the Compliance Committee.

Noucor periodically updates the evolution of the impacts with the results of the different action plans incorporated in the management systems of the different areas of responsibility.

The Compliance Committee is responsible for the proper management and supervision of the effectiveness of the risk management systems, for identifying and discussing weaknesses and for reporting to the Board of Directors.

The Board of Directors is responsible for approving the risk management model and is informed of the development of its performance by means of risk management indicators.

## 4.2 Ethics, human rights and compliance

commitments and principles to ensure compliance by all employees and third parties through our current **Code of Ethics**, approved in July 2022 by the Board of Directors and mandatory for all Noucor employees, which includes the principles and behaviours expected of all members of the Group.

This code reflects the values and ethical principles by which the Group and its employees must abide, with the aim of respecting human rights and complying with the legal requirements and regulations applicable to each of the activities carried out.

At Noucor, a culture of ethics and compliance is constantly promoted and developed. There is a Crime Prevention Model in continuous review and evolution, which incorporates all the Group's actions and activities, as well as the anti-fraud, anti-corruption, IT crime, environmental crime and Whistleblower Channel control processes.

The Code of Ethics is the guide used to apply Noucor's values to its daily activities, as well as to transmit them to key stakeholders.

All Noucor employees are required to know and apply the Code of Ethics and the policies that develop its principles, and must agree to comply with all its provisions. In addition, all have been trained and are aware of the organisation's policies and practices for responsible conduct and the channel for raising concerns, complaints or allegations of misconduct.

The **Compliance Committee** is the body in charge of ensuring good governance and rigour in the behaviour of all employees, monitoring policies relating to regulatory and compliance issues and reporting periodically to the Board of Directors.

As an internal control tool, Noucor has implemented a **whistleblowing channel** available to all its employees to channel concerns, queries, complaints or reports related to ethics and compliance policies and procedures, which follows the requirements established by **Directive (EU) 2019/1937**, whose purpose is to provide a secure system so that the Group's employees can channel their concerns, queries, complaints and reports related to ethics and compliance procedures and protocols of good practices, through their hierarchical superior, department head, human resources, the legal department or the company's works council.



In 2022, Noucor did not receive any significant fines or sanctions<sup>1</sup> in relation to incidents of non-compliance with voluntary codes, sectoral codes, human rights or legislation, including, among others, in the economic, labour, social and environmental fields.

Also, all Group companies where this is required by law have set up an Equality Committee to handle queries, complaints and reports made through the whistle-blowing channel.

Contractors and third parties who do business with Noucor are obliged to be familiar with and accept Noucor's Code of Ethics.

During the 2022 financial year, the whistle-blowing channel received one complaint, which was dealt with by the Compliance Committee in accordance with Noucor's internal regulations. This complaint has now been resolved and closed.

In 2022, Noucor did not receive any significant fines or sanctions<sup>1</sup> in relation to incidents of non-compliance with voluntary codes, sectoral codes, human rights or legislation, including, among others, in the economic, labour, social and environmental fields.

### 4.3 Sustainable Sourcing

Noucor has a **Global Sustainable Procurement Policy** that establishes the relationship framework and criteria in the supplier selection and evaluation processes. To extend the Group's principles to the entire value chain, Noucor strives to maintain stable business relationships with its suppliers and collaborates with them in continuous improvement to advance on the path to sustainability.

Noucor's commitment to the value chain is embodied in the following actions:

- We proactively participate in **customer-initiated sustainability programmes**.
- We include in the supply contracts signed with suppliers a **clause on responsible business practices** covering ethics, human rights, labour and the environment.
- Evaluation of all suppliers, by means of their own questionnaire including **social, ethical, environmental and economic issues...**

During 2022, 100% of suppliers have completed Noucor's own questionnaire. Audits of raw material suppliers are carried out in accordance with an annual plan established by the Quality area. These audits make it possible to assess the quality and risk of operations and suppliers that may have a significant risk of regulatory and human rights violations. A total of 19 audits were carried out in 2022, all of which led to the implementation of **improvement plans**. No consideration has been given to terminating the business relationship with any of the suppliers assessed.

Noucor firmly believes that local cooperation leads to more sustainable practices, both ethically, environmentally and socially. In line with this commitment to contribute to the generation of value in nearby communities, Noucor favours the hiring of local suppliers, whenever possible. In 2022, local suppliers accounted for 55.12% of the total number of suppliers.

1. Notifications with a final judgement or agreement and with an amount equal to or greater than 50,000 euros paid in the reporting period are considered significant.

**Geographical distribution of suppliers**

<b>Geographical distribution of suppliers</b>	<b>2022</b>
N° of local suppliers <sup>2</sup>	548
N° of other national suppliers	207
N° of international suppliers	225
<b>Total number of suppliers</b>	<b>980</b>

<b>% of supplier expenditure</b>	<b>2022</b>
Local suppliers	55.12%
Other national suppliers	16.79%
International suppliers	28.09%



2. Local suppliers are considered to be those suppliers whose tax identification number belongs to the province of Barcelona.



#### 4.4 Profits and taxes

Noucor fulfils its commitments in terms of tax payment and transparency. Within good corporate governance practices, policies, principles and values are established that govern the ethical behaviour of the company and affect all the people who form part of Noucor.

All of Noucor's policies also seek to maintain the integrity of accounting records and financial statements.

In addition to the Code of Ethics, specific anti-corruption, anti-bribery and anti-money laundering procedures are in place at Noucor as it identifies, depending on the type and value of the financial transaction, which company employee has been assigned responsibility for contracting with third parties or who may be responsible for authorising the expenditure to be made, or who is authorised to order the disbursement of funds on behalf of Noucor. In addition, there is also a purchasing procedure where the different transactions are defined, as well as the levels of authorisation required to make them effective.

All profits<sup>3</sup> earned by Noucor in 2022 correspond entirely to companies located in Spain and amount to a loss of 3,158 thousand euros, mainly due to the impact of the amortisation of intangible assets arising from the acquisition of the Noucor legal entities. The amount paid in taxes at consolidated level in 2022 amounted to EUR 1,034 thousand.

Compliance with the tax strategy is monitored by Noucor's governing bodies and reported in the consolidated annual accounts.



In addition to the Code of Ethics, specific anti-corruption, anti-bribery and anti-money laundering procedures

#### 4.5 Subsidies received

In 2022 Noucor received a soft loan of 4,321 thousand euros and a grant of 617 thousand euros from the Ministry of Industry, Trade and Tourism to finance part of an environmental project being carried out at the Urquima production plant.

<sup>3</sup>. Pre-tax profits



## 5. Commitment to Health and Wellbeing

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Noucor's mission is to turn all its knowledge and expertise into high-quality products and reliable solutions for the healthcare ecosystem, working in close collaboration with its customers and suppliers. Thus, Noucor's health and wellbeing policies are aimed at its employees, its products and society in general. Noucor's business model is based on offering innovative products with the highest quality, collaborating with stakeholders, with whom we share the same objective.

Noucor, as a manufacturer of finished pharmaceutical products, has manufacturing certifications from different health authorities. Among other things, it is registered with the US Food and Drug Administration (FDA) for the purpose of exporting medicines to the United States of America. This project is of great strategic importance to Noucor, and the company has allocated the necessary resources to ensure its success.

### 5.1 Quality and information on our products

#### Policy and management systems

Noucor's quality system covers all business processes that may affect product quality, patient safety or regulatory compliance. Noucor's Quality Policy is promoted by the management, communicated and understood at all levels of the company. In this way, the Group aims to produce products of the highest quality.

To guarantee quality, Noucor has a system that follows the principles and guidelines of the Good Manufacturing Practice (GMP), the Law 29/2006, of July 26, 2006, on Guarantees and Rational Use of Medicines, and equivalent guidelines such as the ICH (International Conference on Harmonisation). Compliance with these regulations is periodically audited by the health authorities of the countries in which Noucor operates and trades, as well as by some customers.



Noucor's quality system covers all business processes that may affect product quality, patient safety or regulatory compliance.

Noucor's quality system is made up of a wide range of procedures and processes, including the **Master Validation Plan**, which includes the actions to be carried out on all the elements linked to the GMP to ensure that they operate reproducibly, correctly and in accordance with their requirements, in order to ensure that the products manufactured meet all the quality and safety requirements. The Validation Master Plan includes manufacturing equipment and methods, services and facilities, analytical instruments and methods, computerised systems and personnel (training and qualification).

Any changes to GMP-validated systems must be validated through the requirements of the Master Validation Plan, thus ensuring product quality. Deviations, if they occur, are corrected through the **corrective and preventive action system (CAPA)**.

Noucor has the following manufacturing certifications from the health authorities at its two production sites:

Palau-Solità i Plegamans	Urquima
Good Manufacturing Practice (EU-GMP) de Catalunya	Departament de Salut de la Generalitat Good Manufacturing Practice (EU-GMP) Departament de Salut de la Generalitat de Catalunya
GMP Compliance of foreign manufacturer Ministry of Industry and Trade Russia	GMP Compliance of foreign manufacturer Ministry of Industry and Trade Russia
GMP Compliance of foreign manufacturer Ministry of Industry and Trade Russia	GMP Compliance of foreign manufacturer Ministry of Industry and Trade Russia
Drugs GMP compliance Pharmaceuticals and Medical Devices Agency (PMDA), Japan ISO 22000:2018	Accreditation certificate of foreign drug manufacturer Minister of Health, Labour and welfare. Japan US Food and Drug Administration (US FDA)
GMP for Food supplements according 21 CFR ISO 22716:2008	

During 2022, the corresponding follow-up audits have been carried out for the ISO standards implemented: ISO 22000:2018 (Food safety management systems) and 22716:2008 (Cosmetic products. Good manufacturing practices).

During 2022, one inspection by health authorities was conducted in Palau. No inspections by health authorities have been received in Urquima.

Noucor's production sites are regularly visited and audited by its partners and customers. In 2022, Urquima had 7 internal audits and received 6 external customer audits and Palau had 7 internal audits and received 3 external customer audits. The results of all audits and inspections have been satisfactory.

## 5.2 Safety

### Product safety

Noucor takes the utmost measures in its processes to ensure the health and safety of consumers:

- Noucor's Quality System ensures that all products are designed and developed in accordance with GMP.

- Production and control operations are clearly specified in written form and GMP requirements are adopted.
- Products are not released for marketing before authorised persons have certified that each production batch has been produced and controlled in accordance with the established requirements.
- Satisfactory arrangements are in place to ensure that the active substances and medicines we manufacture are stored and distributed in such a way that quality is maintained throughout their shelf life.

### Patient safety

At the Palau Solità i Plegamans plant, all measures are taken to guarantee the health and safety of patients, in compliance with sector regulations, including the following measures:

- **Market release authorisation of each manufacturing batch**, with review of each manufactured batch to confirm that the product meets its specifications and conforms to the conditions of authorisation prior to placing the product on the market.

- **Monitoring product stability.**
- **Product quality review** with the implementation of an annual quality monitoring programme for all our products.
- **Pharmacovigilance**, with the implementation of a Pharmacovigilance system for all medicines that are marketed with the aim of detecting any type of adverse reaction and signals that occur during the marketing of the medicine. At Noucor, safety reports are regularly submitted to the health authorities for each of the products marketed.

For reporting adverse reactions, the spontaneous notification method is used, reported by health professionals or users to the authorities. In this respect, information sessions are held throughout the year to raise staff awareness of the importance of channelling this type of information to the people in charge of the organisation.

In this context, **100% of Noucor's products**, whether they are medicines, food supplements, medical devices or cosmetics, are assessed for their impact on the health and safety of their consumers and are developed for improvement.

During 2022, there have been **no cases of non-compliance with regulations relating to the health or safety** of products marketed by Noucor that have resulted in fines, sanctions or warnings from authorities, agencies or administrations.

### 5.3 Commitment to access to health care

Noucor cooperates with different organisations to improve access to health and promote the active health of all people, both its employees and society in general.



In this context, 100% of Noucor's products, whether they are medicines, food supplements, medical devices or cosmetics, are assessed for their impact on the health and safety of their consumers and are developed for improvement.

#### Internal programme

Within the framework of Noucor's healthy company model, training and health campaigns are carried out for the Group's employees aimed, among other things, at acquiring healthy habits, such as nutrition and cardiovascular prevention.

During 2022, activities have focused on:

- consulting on healthy eating habits
- first-aid training.

In addition, we have 1 defibrillator in each work centre, ready to act quickly in case of cardiac arrest of the people who work in these facilities, whether they are staff, subcontractors or suppliers. This equipment has been made available to the public health emergency service, for use by the population in the event of an emergency near our facilities.

#### External programme

Noucor has mechanisms in place to identify the needs of society in order to prioritise its contribution based on principles of need, proximity and value generation.

Following these principles, Noucor's main lines of social action are:

- Access to health and vulnerable people
- Job placement and entrepreneurship
- Support for local development and culture

The following are the donations made in 2022 to organisations with experience and reputation, to social action projects to help cover needs related to Noucor's main lines of action:

Social Action Projects 2022	Foundation /NGO	Destination country	Nº. of beneficiaries	Amount (€)
Access to employment for people with functional diversity	Randstad Foundation	Spain	48,688 people	€11,187
Urtikaria Research Foundation	Urtikaria Network	Germany	25% of the world's population	€10,000
Working with war refugees	UNHCR/ Migranodearena Foundation	Ukraine	3.2 million people	€930
Fostering knowledge and collaboration between academia and business	IQS Foundation	Spain	Society at large	€6,000



During 2022, the total amount of donations made amounted to 28,116.67 euros.

In 2022, a sponsorship of €2,200 was made for the indoor football team of the Can Calet neighbourhood (Sant Fost de Campsentelles Barri Can Calet, C.F.S.).

#### 5.4 Complaints and Customer Service

Noucor has a management and customer service model to speed up the reception and resolution of complaints and other queries about its products and services. The main objective of this service is to resolve customer queries, complaints or claims quickly, clearly and transparently.

The measures adopted to guarantee the health and safety of consumers are those mentioned above, which are included in Noucor's quality system.

#### Claims/complaints received in 2022

##### Palau

The total number of product complaints received in 2022 was 111. All complaints were registered, and 97 were investigated and resolved at year-end. As of December 31, 2022, 14 remained open and as of the date of writing this report, 3 remain to be closed.

##### Urquima

During 2022, 3 complaints were received. All complaints were registered, and at year-end all were investigated and resolved, except for 1 which was opened on December 12, 2022 and which at the date of writing this report is still open. For the rest, actions have been defined and implemented to prevent the recurrence of the causes of the complaints.



Noucor has a management and customer service model to speed up the reception and resolution of complaints and other queries about its products and services.

Total Complaints 2022	
Total nº. received	114
Total nº. closed	110
% requests closed	96.5 %

The main causes of complaints, although diverse in nature, are related to the packaging of products manufactured by third parties, such as loss of product or damaged packaging.





# 6. Commitment to people

Noucor is firmly committed to people and to the creation of quality employment developed in a safe, healthy, diverse, inclusive and supportive work environment, where learning, talent and leadership are promoted in an innovative framework, where digitalisation plays a fundamental role in the transformation towards new forms of organisation and work.

Noucor supports the creation of quality employment through permanent contracts and pays special attention to labour relations. Noucor promotes a healthy, safe and healthy working environment by implementing a Management System based on the international standard ISO 45001, which is audited internally and externally on an annual basis.

The promotion of equality and diversity is part of Noucor's organisational culture, being present in all Human Resources management processes. Equal opportunities and respect for diversity are part of the Group's values and the principles set out in Noucor's Code of Ethics.

The Group fosters a collaborative and entrepreneurial culture, with a global vision focused on agility and the achievement of results, always based on the values and principles of responsible and ethical behaviour, as set out in the Code of Ethics.



The Group fosters a collaborative and entrepreneurial culture, with a global vision focused on agility and the achievement of results.

## 6.1 Staffing structure

Noucor's **workforce as of December 31, 2022** was 462 employees, of which 47.4% are women and 52.6% are men.

The **average number** of employees in 2022 was 433, of which 46.9% were women and 53.1% men. 94% of the workforce has a permanent contract and 100% work full time. The majority of the workforce is between 30 and 50 years of age, representing 61% of the total number of Noucor employees.

All of Noucor's employees work in Spain, at the centres in Catalonia.

Below is detailed information on the total number of employees, counted as the average workforce for the year 2022, by gender, age, professional category and type of employment contract:

2022		
Total number of employees by gender		
Total	Men	Women
433	230	203

2022			
Total number of employees by age			
Total	30	30-50	>50
433	40	264	129

2022				
Total number of employees by professional category				
Total	Directors	Managers	Coordinators	Admin. and operators
433	26	35	27	345

2022		
Total number of employees by type of contract		
Total	Indefinite	Temporary
433	407	26

The annual average number of permanent contracts, temporary contracts and full-time and part-time contracts by gender, age and professional category is detailed below:

Professional category	Indefinite		Temporary	
	Full-time	Part-time	Full-time	Part-time
Men	217	-	13	-
Women	190	-	13	-
<b>Total</b>	<b>407</b>	<b>-</b>	<b>26</b>	<b>-</b>

Professional category	Indefinite		Temporary	
	Full-time	Part-time	Full-time	Part-time
Directors	26	-	-	-
Managers	35	-	-	-
Coordinators	27	-	1	-
Admin. and operators	320	-	25	-
<b>Total</b>	<b>407</b>	<b>-</b>	<b>26</b>	<b>-</b>

	Indefinite	Temporary	Full-time	Part-time
<30	34	6	-	-
30-50	246	18	-	-
>50	127	2	-	-
<b>Total</b>	<b>407</b>	<b>26</b>	<b>-</b>	<b>-</b>

Detailed information on redundancies for the financial year January 1 to December 31, 2022, by gender, age and professional category::

	Directors		Managers		Coordinators		Admin. and operators	
	Man	Woman	Man	Woman	Man	Woman	Man	Woman
<30	-	-	-	-	-	-	-	-
30-50	-	-	1	1	-	-	2	-
>50	-	-	-	-	-	-	-	-
<b>Total</b>	<b>-</b>	<b>-</b>	<b>1</b>	<b>1</b>	<b>-</b>	<b>-</b>	<b>2</b>	<b>-</b>

## 6.2 Diversity, equality and inclusion

Noucor is committed to diversity, the reduction of inequalities, and social inclusion, and rejects any type of discrimination, whether for reasons of race, gender, culture, religion, age, opinion or any other personal or social condition, making decisions on selection, promotion and remuneration based on objective data on qualifications, achievements and performance, promoting these values from the Board of Directors and Management to all employees.

All of Noucor's activity is carried out in Spain, which is why most of the staff are Spanish, although it also has employees of different nationalities and races, with a commitment to cultural diversity as a source of enrichment in the relationships between its professionals.

Noucor fosters a climate of respect, dignity and equal opportunities to create an appropriate working environment that favours the achievement of personal and professional objectives in a balanced manner. The Group fosters a career path based on objective performance and capability data, and maintains a proactive attitude towards training and developing new skills to retain and reinforce talent.

In order to put our policies and principles into practice, Noucor takes care of the leadership style and works every day to have a sustainable organisational culture.

As stated in Noucor's Code of Ethics, respect and non-discrimination are one of its fundamental principles. How the organisation treats its employees and how they treat each other defines and underpins the Group's corporate culture and values. All employees have the same working conditions and welfare standards.

In the same context, all Noucor employees, regardless of their position and responsibility, have the duty to treat each other with dignity and respect, in order to achieve a pleasant and optimal working environment for their personal and professional development. The organisation rejects and prohibits any manifestation of harassment or abuse of authority, as well as any other conduct that may generate an intimidating or offensive environment for people, and therefore, in the event that an attitude not in accordance with these principles is detected, the corresponding corrective and disciplinary measures will be adopted, as well as measures for the protection of the people affected.

Noucor's **Equality Policy** includes a firm commitment to equal treatment and opportunities. In 2022 Noucor drew up an **equality plan** in accordance with Royal Decree 901/2020 for the effective equality of men and women, which applies to all Group entities, as well as meeting the legal requirement for Group companies with more than 50 employees.

This equality plan makes it possible to detect any pay gaps and, if necessary, to take corrective measures, to monitor pay developments and to prevent any deviations in terms of equal pay.

At Noucor we do not tolerate harassment practices of any kind, or actions that may cause discrimination or humiliation. Failure to comply with the Code of Ethics may result in disciplinary action, if applicable.

Noucor has a **protocol for sexual or gender-based harassment** which stipulates that the person affected or whoever becomes aware of situations of harassment must report it in writing to the compliance channel, explaining the incident as clearly and specifically as possible.

The Compliance Committee is the body designated to receive and investigate notifications issued by Noucor in relation to harassment cases.

During 2022 the Compliance Channel received one complaint related to workplace harassment. The complaint was investigated and closed, in accordance with procedure.

### Inclusión y accesibilidad

Noucor is also committed to people with functional diversity. The Group collaborates in their integration into the world of work by contracting services from Special Employment Centres (CEE), which act as suppliers in different services outsourced by the Group. Internally, we are also committed to a diverse team of employees, and as far as possible, we work to incorporate people with disabilities into the workforce.

During 2022 Noucor contracted the services of the Fupar Foundation, which employs people with functional diversity, to carry out gardening work in the work centres.

Furthermore, in 2022, Noucor had 3 people with disabilities hired in its work centres, which represents 0.7% of the average workforce in 2022.

**Procurement of services to a foundation for the employment of people with functional diversity.**



Spain
270 people
€67,218

Noucor's production centres are equipped with **accessibility** measures to facilitate access, mobility and evacuation in case of emergency for people with reduced mobility and for people with disabilities and hearing impairment.

**6.3 Work organisation and social relations**

Noucor respects and guarantees the basic rights of association and collective bargaining of all employees, in accordance with current legislation and the collective bargaining agreement for the chemical industry, a principle that is also enshrined in the Group's Code of Ethics. The trade union elections determine the composition of the works council and the staff delegates. The works council is the interlocutor with the employer's representatives and the agents involved in collective bargaining. Elected representatives are given union time credit to enable them to carry out their duties. **100% of Noucor's employees are covered by the company's collective bargaining agreement** and are covered by labour legislation and the guidelines of the Group's Code of Ethics.

At Noucor, the right to freedom of association and the effective recognition of the right to collective bargaining are respected. We also uphold the right of all workers to freedom of association, to join trade unions, to hold trade union elections to seek representation without fear of intimidation, reprisal or harassment.

The Works Council at the operational sites has 21 members representing the entire workforce (13 at Noucor Health, 5 at Urquima and 3 at Biohorm). Communication between the company and the members of the works council takes place through regular meetings.

As for the **organisation of working time**, it is organised in three shifts (morning, afternoon and evening) for those employees working in the production environment, and in split shifts for the rest. In the case of overtime, it is preferably compensated by time off, provided that it does not disrupt the normal production process. Compensation for time off, or remuneration in its absence, is subject to the company's internal regulations, always under the criteria of voluntariness and the maximum annual number of overtime hours established in the Workers' Statute.

Noucor has an **employment calendar** with the working days and public holidays established by the country's legislation. In addition, measures regulated by collective agreements are available to provide for the organisation of working time and to ensure compliance with labour legislation on social relations.

Noucor tries as far as possible not to make **organisational changes** that could affect employees in their personal lives, but if necessary, the person concerned is always informed well in advance.

Noucor has implemented **measures to reconcile** personal, family and professional life that allow its employees flexibility according to their personal circumstances, such as paternity and maternity, care for family members, childcare, etc. In this context, one of the measures worked on during 2022 was Flex and Work (teleworking), which was approved in February 2023.

Although Noucor does not explicitly have a policy of **disconnection from work**, it promotes a flexible organisational culture that adapts to the needs of each professional and allows a better balance with family and personal life, without the need to be connected or answer emails after the end of the working day.

Other measures such as canteen service, medical service and plan wellness, coach service, all of them aimed at facilitating work-life balance and well-being are also in place.

## 6.4 Training and development

Noucor encourages the continuous development of the skills and competencies of its employees, offering training that improves the technical qualifications required by people in the performance of their duties, as well as contributing to the growth of attitudes and skills for their personal and professional development, promoting employability in order to be more resilient.

Noucor's Code of Ethics includes the promotion of professional development, based on equal opportunities and work-life balance, indicating that the organisation is committed to ensuring equal opportunities and acting without discrimination of any kind on grounds of age, race, colour, sex, religion, political opinion, national background, social origin or disability.

During 2022 all employees of the Noucor Group were trained in the principles and expected behaviours of the Code of Ethics.

Noucor has procedures in place to identify training needs, incorporate them into the training plan each year and establish the necessary resources for their implementation.

The training carried out in 2022 amounted to 8,660 hours.

Hours of training by professional category	Nº Hours
Directors	1,181
Managers	1,491
Coordinators/ Technicians	2,495
Admin. and operators	3,493
<b>Total</b>	<b>8,660</b>

Noucor has a **Talent Management Committee** whose objective is to identify the people with the greatest potential in the Group's companies, through performance evaluations, which are the basis for identifying and managing internal talent and promoting the professional growth of the teams.

## 6.5 Remuneration

Noucor has a remuneration policy defined within the framework of the equality plan, which is also in line with sector-specific criteria. In this way, the Group promotes equal treatment of men and women. Noucor's remuneration model rewards the level of responsibility and professional career of each employee, ensuring internal equity and external competitiveness.

For Noucor, it is essential to establish a competitive and motivating remuneration system for its professionals, with the aim of favouring their consolidation and being a differentiating factor with respect to the competition. To this end, the following basic principles of compensation are established:

- Favour the **attraction, recruitment and retention of the best professionals**, taking into account external remuneration levels.
- Examine **Noucor's position vis-à-vis the competition** in order to respond to market trends.
- **Recognise and reward** the dedication, effort and performance of all professionals through appropriate promotions.
- Promote **internal fairness** by establishing a remuneration system based on responsibilities and performance.

Remuneration includes variable capital stock and social benefits, retirement benefits, among others. Variable capital stock is linked to the achievement of objectives of an individual, a team and Noucor as a whole. Noucor promotes a flexible remuneration system that adapts to the needs of each professional and allows a better work-life balance.

Within the framework of this policy and the remuneration and benefits procedure, each area manager proposes the remuneration of his or her employees to the Personnel Division, taking into account the market, individual capacity, skills and development opportunities.

Below are the average salaries by gender, age and professional category:

Total	Directors <sup>4</sup>			Managers			Coordinators			Admin. and operators		
	<30	30-50	>50	<30	30-50	>50	<30	30-50	>50	<30	30-50	>50
Men	-	93.153.45	79.228.76	45.172.34	64.102.11	68.961.42	34.578.74	46.180.52	47.958.89	30.015.53	4.811.97	40.693.04
Women	-	80.113.49	95.323.71	-	57.172.90	64.521.90	-	42.874.96	47.260.48	30.620.73	34.907.61	36.612.46
Total	-	89.432.97	93.743.72	45.172.34	57.172.90	67.559.68	34.578.74	44.880.14	47.623.77	30.292.05	34.858.40	38.970.40

#### Pay gap by professional category

Directors	Managers	Coordinators	Admin. and Operators
-4.25%	12.11%	-1.05%	3.23%

The differences observed in the average pay of some groups by category, age and gender are mainly due to factors such as seniority and classification in the same occupational groups of different categories.

The average pay reported and used for the calculation of the pay gap corresponds to the theoretical annual gross pay<sup>5</sup> to be received. Standardised remuneration<sup>6</sup> has been taken into account in the calculations.

The average remuneration of the directors, including variable remuneration, allowances, indemnities and payment to long-term savings schemes is 63,643.43 euros. Remuneration is not indicated by gender because all board members are men.

The **pay gap**<sup>7</sup> is 1.73%. It is detailed below by professional category:

## 6.6 Health and safety in the workplace

Noucor carries out its activities considering occupational risks, the minimisation of their impact and regulatory compliance, ensuring a safe and healthy working environment through the **Health and Safety Policy** and the implementation of a **Management System** certified according to the international standard **ISO 45001**. The system has the necessary procedures and controls to carry out the identification and evaluation of hazards and risks, the implementation of preventive measures, training and information, participation, as well as the means for notification, investigation and communication of accidental and emergency situations that may occur.

To carry out these activities, Noucor has a Global Health and Safety Team and the necessary human and material resources. The performance of the Management System is regularly monitored through key indicators, scheduled safety inspections and annual internal and external audits.

#### Accidents at work and occupational illnesses

During 2022, eleven occupational accidents with sick leave were reported, of which 4 were women and 7 were men, none of which were serious. Nor have any occupational illnesses been reported at any of Noucor's workplaces.

All accidents have been recorded, investigated and reported. In all cases, action plans have been established with corrective measures to avoid repetition.

In accordance with current legislation and collective bargaining agreements, Noucor safeguards labour rights. These agreements include, among others, aspects related to occupational safety and health with emphasis on the implementation of preventive measures, promotion of relations and dialogue with workers' representatives. Noucor employees are fully covered by the health and safety system.

All Group workplaces have joint occupational health and safety committees that meet at least once every quarter. During 2022, a total of five meetings were held, four of which were of an ordinary nature and one of an extraordinary nature to deal with issues related to the evaluation of psychosocial risks.

4. The average remuneration of the professional category "Directors" does not include the salary of the CEO.

5. **Average remuneration:** the base salaries of all base salaries (gross annual + actual variable) of the same professional category for the entire financial year 2022, divided by the total number of persons in that category.

6. **Standardised remuneration:** fixed salary + equalised variable, i.e. equalised to full and annualised working days.

7. **Gender pay gap** is the difference between men's gross wages and women's gross wages, divided by men's gross wages, expressed as a percentage of men's gross wages.

Occupational accidents 2022 in employed persons	Noucor Total		Palau		Urquima	
	Man	Woman	Man	Woman	Man	Woman
Number of accidents without sick leave	5	3	3	3	2	0
Number of accidents with sick leave	7	4	4	4	3	0
Number of accidents in itinere <sup>8</sup> with sick leave	3	2	2	0	1	2
Number of accidents in itinere without sick leave	0	0	0	0	0	0
Number of occupational illnesses	0	0	0	0	0	0
Frequency index <sup>9</sup>	18.37	11.22	15.17	13.54	27.88	0
Severity index <sup>10</sup>	0.51	0.88	0.54	1.06	0.48	0

### Total number of hours of Absenteeism

During the year 2022, 40,636 hours of absenteeism were recorded, accounted for by sick leave due to common contingencies.

### Promoting health and wellbeing at work

Noucor has a medical team for the continuous monitoring of the health of its employees. The main objective is to prevent occupational illnesses, to develop specific medical examinations at our facilities, to raise awareness of the importance of health care, and to promote a culture of safety and physical, emotional and mental well-being.

In order to ensure legal compliance with health aspects in the workplace, Noucor takes a holistic approach to health management, incorporating it into all Group policies.

During 2022, a Psychosocial Risk Assessment was carried out at all Noucor centres to identify workers' perceptions of their emotional and psychosocial health.

The medical check-ups established by current legislation are carried out annually, depending on the profiles previously established according to the risk assessment of each job, the annual report of the Medical Service and the associated epidemiological study.

Activities related to healthy habits, nutrition, cardiovascular prevention, training and health campaigns are also carried out on a regular basis.

All Noucor staff have at their disposal the "BH Wellness" programme designed to provide emotional and psychological wellbeing. The programme has a telephone line available 24 hours a day, 365 days a year and has an app and a portal of healthy content, such as:

- Coaching sessions,
- Thematic webinars
- Personalised psychological support
- Healthy living programmes, and
- Relaxation techniques, among others

In addition, there is a defibrillator in each work centre, ready to act quickly in the event of cardiac arrest of the people working in the facilities, whether they are employees, subcontractors or suppliers. This equipment has been made available to the public health emergency service for use by the population in the event of an emergency near the Noucor facilities.

8. In itinere accidents are not included in the calculation of severity and frequency rates.

9. For the frequency index, the theoretical hours worked by gender have been taken into account

$$I.F.= \frac{\text{Num. of accidents}^6}{\text{Num. hours worked}}$$

10. For the severity index, the theoretical hours worked by gender have been taken into account

$$I.F.= \frac{\text{Num. workdays lost} \times 10^3}{\text{Num. hours worked}}$$





# 7. Commitment to the environment

## 7.1 Environmental management

Noucor shows its commitment to the environment, the preservation and care of the natural surroundings, through its **Environmental Policy** and the implementation of the **Environmental Management System** based on the international **ISO 14001** standard, which is audited internally and externally on an annual basis. The Group's activity is carried out in a responsible manner with strict regulatory compliance, considering the management of risks identified by the system's procedures, the minimisation of environmental impacts and using the best available practices and technologies for the optimisation of resources and the prevention of pollution.

Noucor has preventive control and active response processes in case of damage or emergencies. Monthly reports are made to the CSMA (Health, Safety and Environment Committee) to middle management and plant managers, and quarterly to the Management Committee.

Noucor also has procedures for the identification of environmental risks. With regard to the **amount of provisions and guarantees for environmental risks**, we have, in accordance with the environmental liability law, a provision of €3,000,000 covering all the Group's environmental risks.

In 2022, environmental improvements worth €6,172,527 were carried out, mainly focused on improving atmospheric emissions at the Urquima centre and circular economy projects:

- Optimisation of scrubbers
- Installation of a Regenerative Thermal Oxidation unit
- Installation of wastewater evaporation system



Noucor has preventive control and active response processes in case of damage or emergencies.

Noucor, in the fiscal year 2022, has received from the Ministry of Industry, Trade and Tourism, through the call for **'Aid for innovation and sustainability projects in the pharmaceutical sector'** of the **EU's Next Generation funds**, a loan of 4,321 thousand euros and a grant of 617 thousand euros to finance part of these environmental projects being carried out at the Urquima production plant.

## 7.2 Optimising Consumption

The optimisation of resources, their efficient use and their responsible management is one of Noucor's main environmental commitments. Energy and water consumption are managed taking into account the variety of the product portfolio manufactured. 2022 was a year of economic uncertainty marked mainly by the scarcity of certain raw materials and the volatility of energy prices.

For Noucor, the consumption of resources is a key aspect of its management, applying measures for greater control and reduction of these, and committing to the best available technologies, the promotion of renewable energy and the awareness of all the people involved.

Consumption 2022	Total	Palau Centre	Urquima
Principal raw materials (t)	1,532	395	1,137
Electricity (mains) (kWh)	12,550,495	7,594,124	4,956,371
Gasoil (L)	1,309,6	1,000	309,6
Natural gas (kWh)	12,750,052	7,010,852	5,739,240
Water (m³)	57,337	28,829	28,508

The principal raw materials consumed for the development of the activity are active ingredients, natural extracts and excipients for the manufacture of the different health solutions that Noucor offers its customers. The packaging material used in the marketing of our products is also relevant.

The main source of Noucor's consumption is related to the operations carried out in the production processes. With regard to water consumption, it should be noted that there are no local limitations on mains water consumption in the localities where Noucor's production centres are located.

**100% of the electricity** consumed in all the centres **is of renewable origin** and is accredited by the corresponding Guarantee of Origin certificates (GdOs).

During the year 2022, improvements were made in the processes that enabled a 45% reduction in water consumption. The total water intake of the Palau centre was 48% from the municipal network and 52% from wells, while in Urquima the distribution was 81% from the network and 19% from wells.

Managing consumption is an important issue for Noucor, with significant resources being dedicated and regular improvements and investments being made to this end.

### 7.3 Climate Change

Noucor's commitment to reducing greenhouse gas (GHG) emissions to combat climate change is implicit in the way it carries out its operations and industrial activities.

The lines of approach on which Noucor's actions aimed at reducing greenhouse gas emissions are based are as follows:

- Investments aimed at improving energy efficiency in facilities
- Optimising processes to reduce consumption
- Gradual plan to incorporate renewable energy.
- Promoting responsible behaviour related to the use of energy, gas, water and electricity.

The actions carried out in Noucor to adapt to the consequences of climate change and achieve the emission reduction targets are:

- Contract for the purchase of electricity from 100% renewable energy sources.
- Establishment and monitoring of an energy efficiency action plan.
- Generation of 1,572,183 kWh for self-consumption through the installation of 3,911 photovoltaic panels in the Palau centre.

We monitor CO<sub>2</sub> emissions from natural gas and diesel consumption, from electricity production and from the use of our own vehicles. This monitoring allows the company to assess and understand what progress is being made in terms of emissions, as well as to establish the best measures for reducing emissions into the environment.

The overall results of the estimated carbon footprint for the year 2022, calculated according to the calculator of the Climate Change Office of Catalonia (OCCC) with the emission factors of 2021<sup>11</sup>, are detailed below.

GHG EMISSIONS Tn eq of CO <sub>2</sub>	2022
SCOPE 1. GHG emissions associated with the consumption of fossil fuels in installations	2,324.16
SCOPE 1. GHG emissions associated with the consumption of transport-related fuels	0
SCOPE 1. GHG emissions associated with F-Gas refills	13.39
SCOPE 2. GHG emissions associated with electricity consumption	0
SCOPE 3.	162.0213
<b>Total GHG emissions</b>	<b>2,499.57</b>

In 2022, Noucor's carbon footprint was 2,499.57 t<sub>eq</sub> CO<sub>2</sub>.

Noucor, in its commitment to the fight against climate change, during the drafting of this report is defining a project using GHG Protocol for the calculation of its footprint, taking 2022 as the base year, in addition to reviewing the Scope 3 categories that have the greatest impact on its carbon footprint in order to incorporate them into the management and calculation of the 2023 carbon footprint. The results of this study will be used to design a 2024-2030 Decarbonisation Plan to mitigate climate change.

## 7.4 Industrial emissions

Noucor complies with the applicable legal requirements regarding emissions. One of the Group's aims is to reduce atmospheric emissions of all kinds of pollutants, including light and noise pollution, not only on the basis of environmental emission limits, but as a continuous improvement objective in relation to the environmental impact of the organisation itself.

At the fine chemicals production centre, Urquima, solvent balances are carried out annually, in compliance with the legislation on emissions of volatile organic compounds, and the results of the parameters are reported at the European level, in the PRTR Register (**European Pollutants Release and Transfer Register**). All values are within the legal limits and within those established in Urquima's environmental authorisation.

At the fine chemicals production centre, Urquima, solvent balances are carried out annually, in compliance with the legislation on emissions of volatile organic compounds, and the results of the parameters are reported at the European level, in the PRTR Register (**European Pollutants Release and Transfer Register**). All values are within the legal limits and within those established in Urquima's environmental authorisation.

Noucor's production plants are equipped with systems for the treatment of emissions from the production processes, such as condensers, with a cooling mixture for the condensation of volatiles and "scrubbers" for scrubbing gases, as well as filters for solids.

With regard to the **principal emissions of polluting gases** associated with the Palau-Solità i Plegamans and Sant Fost de Campsentelles (Urquima) centres, in 2022 the regulatory controls were carried out with regard to the control of the corresponding environmental licences/authorisations and the self-monitoring established in the environmental management systems. The results in all cases have been satisfactory.

Acoustic measurements are taken regularly, as well as sound measurements in the outdoor environment and light pollution controls. The results in both cases are within the margins established by local regulation

## 7.5 Circular economy

The circular economy is part of Noucor's environmental management. Maximum use is made of available resources by applying the 3R rule, promoting Reduction, Reuse and Recycling.

11. In June 2023, when the new emission factors will be published, the actual carbon footprint calculation for 2022 will be available.

Classification	Urquima	Palau	Total
Hazardous waste (t)	3,802.95	44.52	3,847.47
Non-hazardous waste (t)	50.63	380.37	431
<b>Total</b>	<b>3,853.58</b>	<b>424.89</b>	<b>4,278.47</b>

Regarding the type of treatment:

Treatment of Hazardous Materials	Urquima	Palau	Total
Recovery (t)	2,151.9	28.85	2,180.75
Disposal (t)	1,651.05	15.67	1,666.72
<b>Total</b>	<b>3802.95</b>	<b>44.52</b>	<b>3,847.47</b>

Treatment of Non-Hazardous Materials	Urquima	Palau	Total
Recovery (t)	44.37	304.48	348.85
Disposal (t)	6.26	75.89	82.15
<b>Total</b>	<b>50.63</b>	<b>380.37</b>	<b>431</b>

Wherever possible, we are committed to the reuse of materials, considering as waste only that which can have no other use. Both plants have procedures in place to recondition raw material packaging for reuse in other applications, thereby reducing packaging purchases and packaging waste management.

As a result of this commitment to circularity, the purchase of solvent, either by direct reuse or recycling, was reduced by 60 tonnes in 2022. This action is highly relevant because in Noucor's sector of activity, solvent reuse is very complicated due to regulatory issues in the field of quality.

### Waste management

Noucor uses resources responsibly, generating as little waste as possible. All of this is fundamental to the Group's environmental management.

Minimising the waste generated at source is a priority for Noucor, and the focus is on optimising management, improving segregation, reuse (whenever technically possible) and recycling at source. As a result of the Group's commitment, by 2022, 6% more of the waste generated at the Palau centre and up to 9% at Urquima has been recovered.

With regard to non-special waste, Noucor promotes the selective collection of all recoverable materials generated during the development of its activities, such as: paper, cardboard and plastic mainly.

The waste declaration is made annually, in compliance with the legislation in this area, and is reported to the relevant administration.

The waste generated is managed according to its composition, and the quantities may vary depending on the portfolio of products manufactured.

Below is the summary of the 2022 data on waste classification:

It should be noted that, in 2022, Noucor has allocated **59.12% of its waste to recovery** and the rest to disposal through authorised waste managers. The information for each type of waste and its destination is detailed in the Annual Declaration of Industrial Waste (DARI) that the organisation prepares, for each productive work centre, in each financial year at the request of the legislation in force for the relevant administrations.

Noucor promotes various initiatives to improve the **treatment and management of waste**, through direct contact and collaboration with the various authorised waste managers with which the organisation works.



## Noucor promotes various initiatives to improve the treatment and management of waste,

### Food waste

Noucor acts responsibly on a daily basis in the fight against food waste through the measures adopted in the canteen and through solidarity initiatives.

Actions carried out through our catering service provider:

- System for reservation and selection of dishes by individuals through a webapp enabled by the catering service provider in the Preordering functionality.
- System for choosing menus in advance in take away form.

These two measures help to adjust the production of dishes to the real needs of each day, avoiding **food waste**.

As a solidarity action, Noucor's commitment to the food recycling project "**Recooperem**", an initiative of the Consell Comarcal del Vallès Occidental in the province of Barcelona, focused on preventing the loss and waste of food, has been taken up again this school year by 47 schools in the region and has the support of 12 social entities.

### Effluent management

Noucor's production plants have Industrial Waste Water Treatment Plants (**WWTP**), which are equipped with control systems that guarantee their correct operation, as well as the quality of the water discharged, in accordance with legislation.

In order to analyse the quality of the wastewater, the company has its own laboratory with specific procedures for management and self-monitoring, and the services of an accredited external laboratory that carries out monthly controls.

The amount of water discharged by Noucor in 2022 through the sewerage network was 28,118 m<sup>3</sup> in total, of which 16,463 m<sup>3</sup> corresponds to the Urquima plant and 13,655 m<sup>3</sup> to Palau.

In 2022, a circular economy project related to the improvement of wastewater management at Urquima with an associated budget of €650,000 was initiated, consisting of the installation of an evaporation system that will allow Noucor to reduce the volume of wastewater generated.

## 7.6 Environmental taxonomy

The roadmap of the European Union's Sustainable Growth Financing Action Plan is to promote sustainable finance, the main objective of which is to increase transparency in financial operations by integrating non-financial risks in their valuation, including any environmental, social or governance event or condition which, if it were to occur, could have a significant actual or potential negative effect on the value of the investment. In this line, the European Taxonomy is the tool that allows the classification of economic activities according to their potential impact and contribution to sustainability.

The Taxonomy is structured around six environmental objectives: climate change mitigation, climate change adaptation, pollution prevention and control, transition to a circular economy, protection of water and marine resources, and protection and restoration of biodiversity and ecosystems. The current regulatory framework sets out the selection criteria for determining whether the company's activity is considered an economic activity that makes a substantial contribution to climate change mitigation or adaptation, and whether this economic activity does not cause significant harm to any of the other environmental objectives.

Noucor is working on identifying activities that can fit into the framework of the European environmental taxonomy.

## 7.7 Protection biodiversity

Noucor has no production sites in areas of special interest or protected areas in the field of biodiversity. This aspect has not been found to be material in the material analysis.

# Appendix

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## Appendix I: External verification report

VERIFICATION STATEMENT



**EQA**

Independent Verification Statement concerning the Statement of Non-Financial Reporting of NOUCOR GROUP, S.L. y and its subsidiaries for the year 2022

To the member management body of NOUCOR GROUP, S.L.

According to section 48 of the Commercial Code, we have verified (within the scope of a limited assurance) the Statement of Non-Financial Reporting (hereinafter, SNFR) of NOUCOR GROUP, S.L. (hereinafter, the Organization) and its subsidiaries for the year ended 31 December 2022, which forms part of its consolidated Directors' Report for the same year.

The consolidated Directors' Report includes information other than that required by current commercial regulations governing non-financial information, which has not been subject to our verification. In this sense, our work was limited exclusively to verifying the information identified in ANNEX 2, included in the Statement of Non-Financial Reporting previously mentioned.

**Management responsibility**

The Organization's Management is in charge of preparing the content of and filing the SNFR, as per Law 11/2018, of 28 December. This responsibility includes designing, implementing and following-up on the internal control required to ensure the SNFR to be free of material misstatements. The SNFR has been prepared pursuant to the contents of current commercial regulations, which were selected in view of the reference made to each matter in Annex 1 of the consolidated Directors' Report previously mentioned.

Furthermore, the Organization's Management is in charge of defining, implementing, adapting and keeping the management systems used to obtain the information required to prepare the SNFR, as well as to follow-up on the degree of compliance with the requirements under Law 11/2018, of 28 December.

**Independence and competence**

The auditing team met the independence, impartiality and other ethics requirements and based its actions on the fundamental principles of sufficiency, objectivity, competence and professional diligence, confidentiality and professional behavior.

EQA is an independent provider of verification services, as set forth by Law 11/2018.

**Number: 11535-E**

Verification date: 29 / 03 / 2023 Page 1 of 3

European Quality Assurance System, S.L. (EQA España) - Calle Joseph Beuys 11 - 1º Planta (Espania) - Valencia (Spain) - 46100 Valencia  
 Subject to the "Certification Procedure and General Terms and Conditions" established by EQA.

VERIFICATION STATEMENT



**EQA**

**Purpose of the verification**

The purpose of the verification is to ensure that the information reported by the Organization in the Statement of Non-Financial Reporting of NOUCOR GROUP, S.L. (herein 21 March 2023), is accurate, complete, transparent and free of errors or omissions.

**Our responsibility**

EQA's responsibility is limited to expressing our conclusions in a limited-assurance independent verification statement based on the procedures performed and the evidence obtained. The engagement has been carried out according to our own methodology and pursuant to the requirements under UNE-EN ISO 45001:2019 International Standard "Conformity Assessment - General principles and requirements for verification and verification bodies."

The scope of a limited-assurance engagement is substantially lower than that of a reasonable assurance engagement and, therefore, the assurance provided is lower.

The procedures performed are based on the professional judgement of the experts involved in the process and include inquiries, process observation, documentation assessments, analytical procedures, and review tests through sampling, which are described below on an overall basis:

- ✓ Holding meetings with staff from the various Organization's departments involved, so as to become aware of the business model, the policies and management approaches applied, the main risks related to these matters and to obtain the information required for the review.
- ✓ Verifying the processes that are available to the Organization to determine the material aspects in relation to its activities.
- ✓ Analyzing the procedures used to collect and validate the data and information submitted in the SNFR.
- ✓ Analyzing how the SNFR was adapted to the provisions under Law 11/2018.
- ✓ Verifying data based on the selection of a sample and performing substantive tests on the quantitative and qualitative information contained in the SNFR for the year 2022.
- ✓ Obtaining a representation letter from directors and Management.

**Number: 11535-E**

Verification date: 29 / 03 / 2023 Page 2 of 3

European Quality Assurance System, S.L. (EQA España) - Calle Joseph Beuys 11 - 1º Planta (Espania) - Valencia (Spain) - 46100 Valencia  
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VERIFICATION STATEMENT



**EQA**

**Conclusions of the verification**

As a result of the procedures performed and the evidence obtained, we have not become aware of any matter that may lead us to believe that the information contained in the SNFR of NOUCOR GROUP, S.L. and its subsidiaries, for the year ended 31 December 2022, has not been submitted in a proper manner, or that there are deviations or material omissions causing us to believe that the report does not meet the requirements under Law 11 of 2018, included in the table under ANNEX 2 of the SNFR.

**Use and distribution**

This verification statement is issued to the Management of NOUCOR GROUP, S.L., pursuant to the stipulations under the contract agreed by both parties.

This statement has been prepared in response to the requirement established by commercial regulations effective in Spain; therefore, it may not be appropriate for other purposes and in other jurisdictions.



Responsable Marketing Services  
 Confianza Comercial

**Number: 11535-E**

Verification date: 29 / 03 / 2023 Page 3 of 3

European Quality Assurance System, S.L. (EQA España) - Calle Joseph Beuys 11 - 1º Planta (Espania) - Valencia (Spain) - 46100 Valencia  
 Subject to the "Certification Procedure and General Terms and Conditions" established by EQA.



## Appendix 2: Table of contents Law 11/2018 with reference to GRI

Below are the sections of the Statement of Non-Financial Information where the contents required by Law 11/2018 of December 28th on information with reference to the GRI standards are answered.

Statement of use	Noucor has prepared this sustainability report for the period January 1 to December 31, 2022 using the GRI standards as a reference.	
GRI I	Fundamentals 2021	
Law 11/2018	GRI Indicator	Section EINF
<b>General issues</b>		
(a) a brief description of the group's <b>business model</b> , including its business environment, organisation and structure, the markets in which it operates, its objectives and strategies, and the main factors and trends likely to affect its future development.	2-1 (2021) Organisational details	2.1
	2-2 (2021) Entities included in sustainability reporting	2.1
	2-3 (2021) Reporting period, frequency and point of contact	2.1
	2-4 (2021) Updating information	na
	2-5 (2021) External verification	2.1 / Appendix 1
	2-6 (2021) Activities, value chain and other business relationships	3.1/3.2 /5.1/5.3
	2-7 (2021) Employees	6.1
	2-8 (2021) Non-employee workers	4.3
	2-16 (2021) Communication of critical concerns	3.3/4.1
	2-27 Compliance with legislation and regulations	4.2
(b) a description of the group's <b>policies</b> with respect to such issues, including the <b>due diligence</b> procedures applied for the identification, assessment, prevention and mitigation of significant risks and impacts and for verification and control, including what measures have been taken.	3-3 (2021) Management of material issues	4.1
	2-22 (2021) Sustainable development strategy statement	3.3
	2-23 (2021) Commitments and policies	4.1
	2-24 (2021) Incorporating commitments into policies	3.4/4.1
	2-25 (2021) Processes to remedy negative impacts	4.1/4.2/4.3
	2-26 (2021) Mechanisms for seeking advice and raising concerns	4.1/4.2
	2-9 (2021) Governance structure and composition	3.3
	2-10 (2021) Appointment and selection of the highest governance body	3.3
2-12 (2021) Role of the highest governance body in overseeing the management of impacts	3.3	

Statement of use	Noucor has prepared this sustainability report for the period January 1 to December 31, 2022 using the GRI standards as a reference.	
GRI I	Fundamentals 2021	
Law 11/2018	GRI Indicator	Section EINF
	2-13 (2021) Delegation of responsibilities for impact management	3.3
	2-14 (2021) Role of the highest governance body in sustainability reporting	2.1/3.4
	2-17 (2021) Collective knowledge of the highest governance body	3.3
(c) the main <b>risks</b> related to those issues associated with the group's activities, including, where relevant and commensurate, its business relationships, products or services that may have an adverse impact in those areas, and how the group manages those risks, explaining the <b>procedures used to identify and assess those risks</b> in accordance with the relevant national, European or international frameworks for each matter. Information on the impacts identified should be included, giving a breakdown of the impacts, in particular the main short, medium and long-term risks.	2-15 (2021) Conflicts of interest	4.1
	2-16 (2021) Communication of critical concerns	3.2/4.2/5.4
	3-1 (2021) Process for determining material issues	3.4
	3-2 (2021) List of material issues	3.4
	3-3 (2021) Management of material issues	Throughout the EINF
Information on environmental issues		
Detailed information on <b>current and foreseeable effects of the company's activities</b> on the environment and, where appropriate, health and safety, environmental assessment or certification procedures; resources devoted to the prevention of environmental risks; application of the precautionary principle, amount of provisions and guarantees for environmental risks.	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	7.1
<b>- Pollution:</b> measures to prevent, reduce or remediate carbon emissions that seriously affect the environment; taking into account any form of activity-specific air pollution, including noise and light pollution.	305-7 (2016) Nitrogen oxides, sulphur oxides and other significant emissions to air	7.4
<b>- Circular economy and waste prevention and management:</b> waste prevention measures, recycling, reuse, other forms of recovery and disposal; actions to combat food waste.	3-3-d(2021) Describe the actions taken to manage the	7.5
	issue and the related impacts	7.5
	303-2 (2018) Management of impacts related to water discharges	7.5
	306-1 (2020) Waste generation and significant waste-related impacts	

Statement of use	Noucor has prepared this sustainability report for the period January 1 to December 31, 2022 using the GRI standards as a reference.	
GRI I	Fundamentals 2021	
Law II/2018	GRI Indicator	Section EINF
	306-2 (2020) Management of significant waste-related impacts	75
	306-3 (2020) Waste generated	75
	306-4 (2020) Waste not destined for disposal	75
	306-5 (2020) Waste for disposal	75
	Food waste	6.6/7.5
<p><b>– Sustainable use of resources:</b> water consumption and water supply in accordance with local constraints; consumption of raw materials and measures taken to improve the efficiency of their use; direct and indirect energy consumption, measures taken to improve energy efficiency and the use of renewable energy.</p>	3-3 (2021) Management of material issues	7.2
	301-1 (2016) Materials used by weight or volume	7.2
	302-1 (2016) Energy consumption within the organisation	7.2
	303-5 (2018) Water consumption	7.2
<b>Information on environmental issues</b>		
<p><b>– Climate change:</b> the significant elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces; the measures taken to adapt to the consequences of climate change; the reduction targets voluntarily set in the medium and long term to reduce greenhouse gas emissions and the means implemented to this end.</p>	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	73
	305-1 (2016) Direct GHG emissions (Scope 1)	73
	305-2 (2016) Indirect GHG emissions from energy generation (Scope 2)	73
	305-5 (2016) Reduction of GHG emissions	73
<p><b>– Protecting biodiversity:</b> measures taken to preserve or restore biodiversity; impacts caused by activities or operations in protected areas.</p>	304-2 (2016) Significant impacts of activities, products and services on biodiversity	7.6 Non-material
	304-3 (2016) Protected or restored habitats	7.6 Non-material
<b>Information on social and personnel issues</b>		
<p><b>2– Employment:</b> total number and distribution of employees by sex, age, country and occupational classification; ; total number and distribution of types of employment contracts, average annual number of permanent contracts, temporary contracts and part-time contracts by gender, age and professional classification, number of dismissals by gender, age and professional classification; average remuneration and its evolution.</p>	2-7 (2021) Employees	6.1
	2-19 (2021) Remuneration policies	6.5
	2-20 (2021) Process for determining remuneration	6.5
	405-1 (2016) Diversity of governing bodies and employees	3.3/6.1/6.2

Statement of use	Noucor has prepared this sustainability report for the period January 1 to December 31, 2022 using the GRI standards as a reference.	
GRI I	Fundamentals 2021	
Law 11/2018	GRI Indicator	Section EINF
Broken down by gender, age and professional classification or equal value; pay gap, remuneration for equal or average positions in the company, average remuneration of directors and executives, including variable remuneration, allowances, indemnities, payment to long-term savings schemes and any other perception broken down by gender, implementation of work disengagement policies, employees with disabilities.	405-2 (2016) Ratio between basic salary and remuneration of women and men.	6.5
– <b>Work organisation:</b> organisation of working time; number of hours of absenteeism; measures aimed at facilitating the enjoyment of work-life balance and encouraging the co-responsible exercise of work-life balance by both parents.	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	6.3
	Policies on disconnecting from work	6.3
	Reconciliation measures	6.2
	Absenteeism	6.6
– <b>Health and safety:</b> health and safety conditions at work; accidents at work, in particular their frequency and severity, as well as occupational illnesses; broken down by sex.	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	6.6
	403-1 (2018) Occupational health and safety management system	6.6
	403-2 (2018) Hazard identification, risk assessment and incident investigation	6.6
	403-3 (2018) Occupational health services	6.6
	403-4 (2018) Worker participation, consultation and communication on occupational health and safety at work	6.6
	403-5 (2018) Training of workers on occupational health and safety at work	6.6
	403-6 (2018) Promoting the health of workers	6.6
	403-8 (2018) Workers covered by the occupational health and safety management system	6.6
	403-9 (2018) Injuries due to accidents at work	6.6
	403-10 (2018) Occupational illnesses and disorders	6.6
– <b>Social relations:</b> organisation of social dialogue, including procedures for informing, consulting and negotiating with staff; percentage of employees covered by collective bargaining agreements by country; the balance of collective agreements, in particular in the field of health and safety at work.	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	6.3
	2-30 (2021) Collective bargaining agreements	6.3

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GRI I	Fundamentals 2021	
Law 11/2018	GRI Indicator	Section EINF
El campo de la salud y la seguridad en el trabajo.		
– <b>Training:</b> the policies implemented in the field of training; the total number of training hours per professional category.	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	6.4
	404-1 (2016) hours of training per year per employee	6.4
– <b>Equality and diversity:</b> measures adopted to promote equal treatment and opportunities between women and men; equality plans (Chapter III of Organic Law 3/2007, of March 22, 2007, for the effective equality of women and men), measures adopted to promote employment, protocols against sexual and gender-based harassment, integration and universal accessibility of people with disabilities; the policy against all types of discrimination and, where appropriate, diversity management.	2-7 (2021)-Employees	6.1/6.2
	406-1 (2016) Cases of discrimination and corrective action	4.2

#### Information on respect for human rights

Implementation of human rights due diligence procedures; prevention of risks of human rights abuses and, where appropriate, measures to mitigate, manage and redress possible abuses; reporting of human rights abuses; promotion and enforcement of the provisions of the International Labour Organisation's core conventions related to respect for freedom of association and the right to collective bargaining; elimination of discrimination in respect of employment and occupation; elimination of forced or compulsory labour; effective abolition of child labour.	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	4.2
	2-23 (2021) Commitments and policies	4.1
	406-1 (2016) Cases of discrimination and corrective action taken	4.2
	409-1 (2016) Operations and suppliers with significant risk of cases of forced or compulsory labour	4.3
	407-1 (2016) Operations and suppliers where the right to freedom of association and collective bargaining could be at risk.	4.3
	408-1 (2016) Operations and suppliers with a significant risk of child labour cases	4.2
	412-1 (2016) Operations subject to human rights impact assessment or review	4.2
	412-2 (2016) Employee training on human rights policies or procedures	4.2/5.3
	412-3 (2016) Significant investment agreements and contracts with human rights clauses or subject to human rights screening	4.2

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GRI I	Fundamentals 2021	
Law 11/2018	GRI Indicator	Section EINF
	414-2 (2016) Negative social impacts in the supply chain and measures taken.	4.3
<b>Información relativa a la lucha contra la corrupción y el soborno</b>		
Measures taken to prevent corruption and bribery; measures to combat money laundering, contributions to foundations and non-profit organisations.	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	4.1
	205-1 (2016) Operations assessed for corruption-related risks	4.1
	205-2 (2016) Communication and training on anti-corruption policies and procedures	4.2/5.3
	205-2 (2016) confirmed incidents of corruption and actions taken	4.2
	Contributions to foundations and non-profit organisations	5.3
<b>Information on the company</b>		
– <b>The company's commitment to sustainable development:</b> the impact of the company's activity on employment and local development; the impact of the company's activity on local populations and the territory; the relations maintained with local community stakeholders and the methods of dialogue with them; partnership or sponsorship actions.	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	3.3/3.4/4.1/5.3
	2-28 (2021) Membership in associations	3.2
	2-29 (2021) Approach to stakeholder engagement	3.4
	203-1 (2016) Investments in infrastructure and supported services	5.3
– <b>Subcontracting and suppliers:</b> inclusion of social, gender equality and environmental issues in the procurement policy; consideration in relations with suppliers and subcontractors of their social and environmental responsibility; monitoring and auditing systems and results of audits.	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	4.3
	204-1 (2016) Share of expenditure on local suppliers	4.3
	308-1 (2016) New suppliers that have passed evaluation and selection filters in accordance with environmental criteria.	4.3
	414-1 (2016) New suppliers that have passed selection filters according to the social criteria	4.3
– <b>Consumers:</b> consumer health and safety measures; complaint systems, complaints received and resolution of complaints.	3-3-d(2021) Describe the actions taken to manage the issue and the related impacts	5.1/5.2/5.3/5.4
	416-1 (2016) Assessment of health and safety impacts of product or service categories.	5.1/5.2
	416-2 (2016) Cases of non-compliance concerning health and safety impacts of products and services	5.2

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GRI I	Fundamentals 2021	
Law 11/2018	GRI Indicator	Section EINF
<p>- <b>Fiscal information:</b> profits earned country by country; taxes on profits paid and public subsidies received.</p>	207-2 (2019) Fiscal governance, control and risk management	4.1/4.4
	207-4 (2019) reporting by country	2.1
	Public subsidies received	4.5



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