

Sustainability Report

2021


ACITURRI
CHOOSE THE MEMORY YOU WANT TO READ
ALESTIS
AEROSPACE

LETTER FORM THE CEO

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INTRODUCTION

Aciturri Aeronáutica S.L.U. Is the parent company which owns the others. Below is the organization chart for **Aciturri Aeronáutica, S.L.U.:**

The entities included in Aciturri's consolidated financial statements are Aciturri Aeronáutica, S.L.U.; Aciturri Aerostructures, S.L.U.; Aciturri Engineering, S.L.U.; Aciturri Assembly, S.A.U.; Aciturri Aeroengines, S.L.U.; Aciturri Additive Manufacturing, S.L.U; Aciturri Getafe S.L.U.; and Alestis Aerospace, S.L.

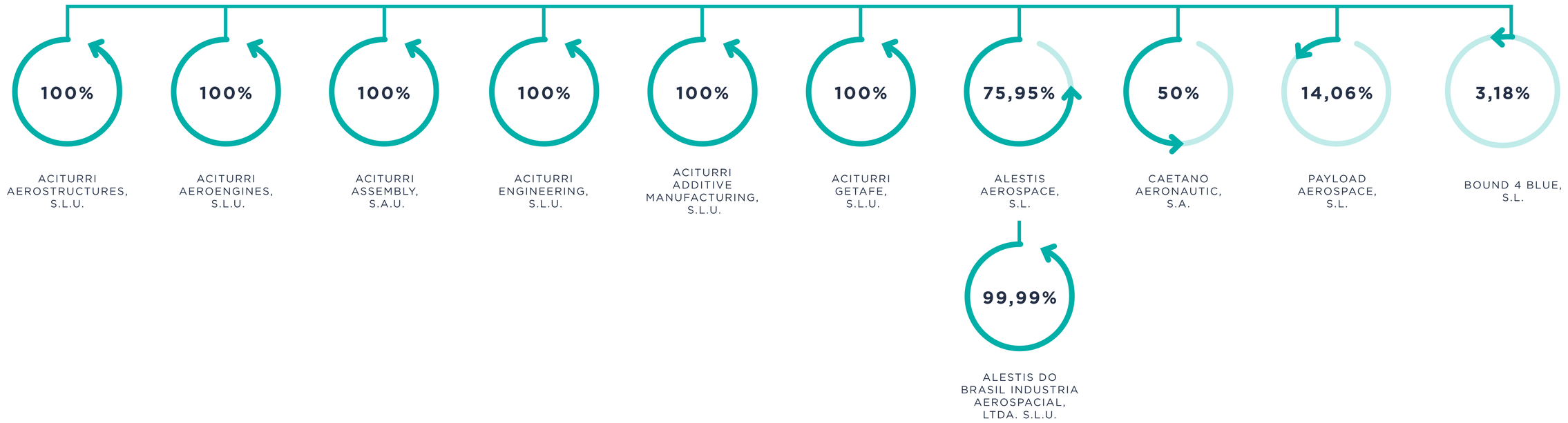
Aciturri Aeronáutica, S.L.U. acquired its stake in Alestis Aerospace, S.L. on July 30, 2019, although at least at the time this report was submitted, the latter had kept its own management and governing bodies.
Therefore, the non-financial information statement of Aciturri Aeronáutica, S.L.U. is presented in two separate blocks:

- The one belonging to **Aciturri Aeronautics, S.L.U.** and the organizations whose management and administration are under its control; namely, Aciturri Aeronáutica, S.L.U.; Aciturri Aerostructures, S.L.U.; Aciturri Engineering, S.L.U.; Aciturri Assembly, S.A.U.; Aciturri Aeroengines, S.L.U.; Aciturri Additive Manufacturing, S.L.U.; and Aciturri Getafe S.L.U.

- The one belonging to **Alestis Aerospace, S.L.,** which includes Alestis Do Brasil, Industria Aeroespacial, Ltda.

The companies Caetano Aeronautic, S.A., owned at 50%, Payload Aerospace, S.L., owned at 15.54%, and Bound 4 Blue, S.L., owned at 3.18%, are independent organizations, so they are not included in any of the above documents.

Aciturri Aeronáutica, S.L.U.'s non-financial information statement (Single-member company) / 2021 Sustainability Report.



“At Aciturri, we apply ethical and responsible management criteria in our day-to-day operations and decision-making to generate positive impact on the environment and stakeholders, and to be an increasingly more sustainable organization, from the economic, environmental, and social points of view.”



Dear friends,

Thank you for taking a few minutes to learn about Aciturri's activities in 2021.

Last year, the cases of COVID-19 were still very high, so I would like to begin by sending my condolences to all those who suffered the loss of family and friends in these bitter circumstances.

This document has been prepared in accordance with Law 11/2018, aimed at amending the requirements regarding non-financial information, and following the guidelines of the Global Reporting Initiative (GRI). The aim is to share with our stakeholders all the information regarding the social, economic, and environmental impact our activity had in 2021, a year in which we renewed one more time the commitment made in 2013 to the United Nations Global Compact as signatory partners.

In 2021, we were forced to cope in an absolutely uncertain context. The drop in the workload due to the pandemic led to a drop in sales when compared to the year before. However, we have a financially robust business project, which allowed us to overcome the situation and face 2022 as the year that will represent the return to the path of growth.

The forecasts for our main customers show a progressive recovery of the market over the coming years. Long-range traffic continues to show no clear signs of recovery, and uncertainty about improving manufacturing rates in this sector is still high. Nonetheless, the signs of recovery are strong in the short- and medium-distance range, and confirm short-term expectations of the progressive increase in manufacturing rates in programs like A320 and B737. They will enable faster recovery in these programs to help reach pre-pandemic delivery rates both in the aerostructures and engine components businesses.

In 2021, we received extremely positive news from a commercial viewpoint. The main one is undoubtedly the contract with Lilium, for whom we will manufacture the structures, wings, and canard of the first electric vertical take-off and landing (eVTOL) aircraft. In addition to the recognition of our technological capability, this contract represents Aciturri's positioning in a sector that will undergo enormous development in the coming years.

At the same time, we kept our commitment to diversification towards non-aeronautical sectors by increasing our shareholding and industrial participation in PLD SPACE (a Spanish company, pioneer in the development of recoverable launchers for small loads and satellites), by developing our own solutions for the storage and transport of hydrogen and in-flight storage solutions, and by promoting the development of clean marine propulsion, for which we took part in Spanish company bound4blue's project for the development of rigid sails.

As the workload started to increase, we canceled the temporary labor force adjustment procedures. Also, we went ahead with the necessary investments in new equipment and facilities, and worked to increase capacities and improve competences, always focusing on maintaining a level of competitiveness that will satisfy new market demands as the recovery occurs.

We took steps forward towards the shared challenge of transforming our capabilities and contributing to the sustainability of the aeronautical industry. We did it by joining Clean Aviation as founders—the reference public-private initiative within the European Union for the development of new aeronautical technologies to support the European Green Deal.

In the same vein, we consolidated the methodology for the exact calculation of our carbon footprint based on the UNE EN ISO 14064-1:2019 standard, which includes an independent third party verification—a step that shows Aciturri's commitment to achieve climate neutrality by 2050.

The potential emergence of new variants of COVID-19, the instability of the energy and raw materials market, and the speed with which borders are opened to restore air traffic, are three variables that will fuel uncertainty globally in 2022. This is the environment we have to work in, but I am sure that, despite all the obstacles along the way, we will find the formula for meeting all these challenges successfully.

We continue to take steps forward around the shared challenge of transforming our capabilities and contributing to the sustainability of the aeronautical industry.

GINÉS CLEMENTE ORTIZ
CEO

Unless otherwise specified, in this document the term “Aciturri” refers to the following companies: Aciturri Aeronáutica, S.L.U.; Aciturri Aerostructures, S.L.U.; Aciturri Engineering, S.L.U.; Aciturri Assembly, S.A.U.; Aciturri Aeroengines, S.L.U.; Aciturri Additive Manufacturing, S.L.U.; and Aciturri Getafe S.L.U.

Aciturri Aeronáutica S.L.U. is the parent company which owns Aciturri Aerostructures, S.L.U., Aciturri Engineering, S.L.U., Aciturri Assembly, S.A.U., Aciturri Aeroengines, S.L.U., Aciturri Additive Manufacturing, S.L.U, Aciturri Getafe S.L.U., and Alestis Aerospace, S.L. All of them are included in the consolidated financial statements of Aciturri Aeronáutica, S.L.U.

Alestis Aerospace, S.L. (owned at 75.95%) has its own management and governing bodies, so it is not included in this report (it has its own non-financial information statement in a separate document).

There are other companies (Caetano Aeronautic, S.A., owned at 50%, Payload Aerospace, S.L., owned at 15.54%, and Bound 4 Blue, S.L., owned at 3.18%), which belong to Aciturri Aeronáutica but are not included in the consolidated financial statements.



Aciturri's management team know that the key to success is making decisions based on ethical and sustainable criteria.

This is the only way to guarantee the business sustainability in economic, environmental and social terms.

REPRESENTATIVE BODIES

BOARD OF DIRECTORS

PRESIDENT

GOVERA INVERSIONES, S.L.U., REPRESENTADA POR **D. GINÉS CLEMENTE ORTIZ**

MEMBERS

D. RAFAEL BARBERO MARTÍN
D. AMADEO TORRENS ROIG
D. ANDRÉS CARRETÓN BUENO
D. JESÚS DE LA VIUDA MARTÍNEZ
D. SEBASTIÁN ARIAS TOBALINA
D. ROBERTO REY PERALES
D. FELIPE GALÁN GARCÍA

SECRETARY NON-COUNSELOR

D. ION PENAS RODRÍGUEZ

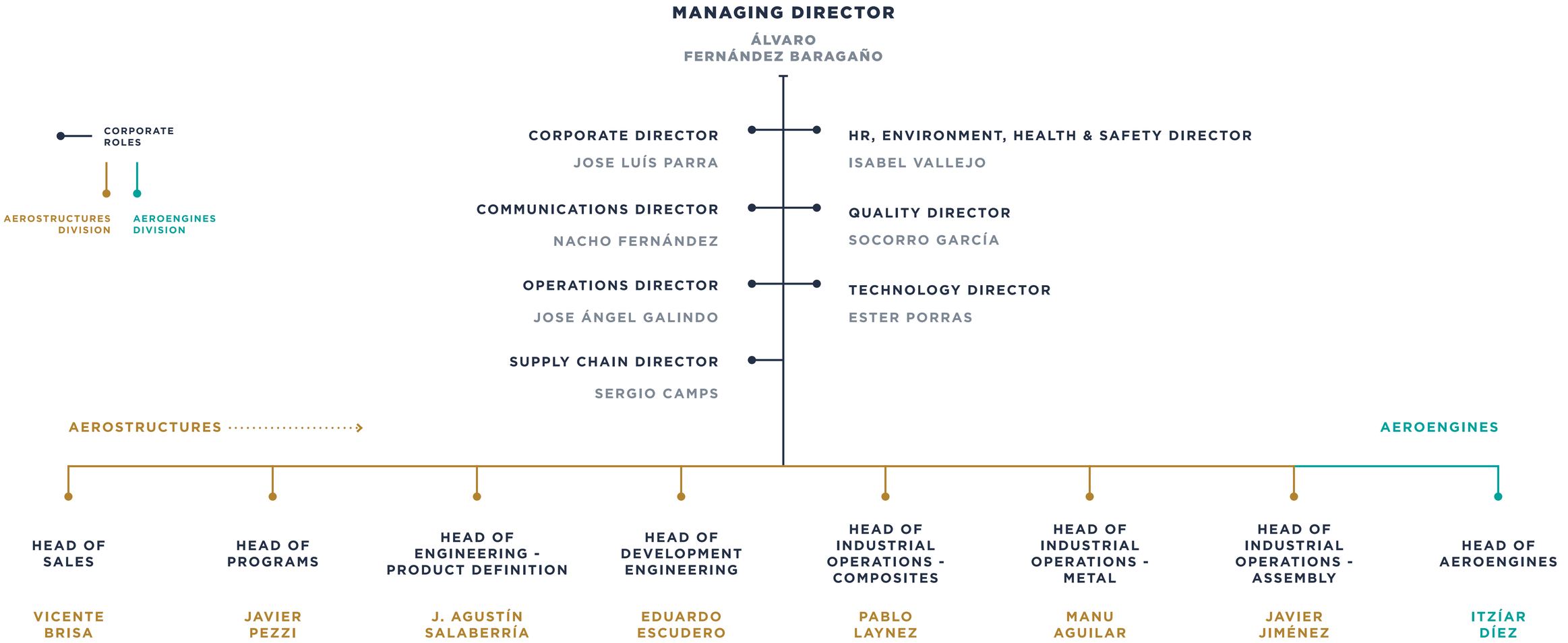
SUB-SECRETARY NON-COUNSELOR

Dª. YOLANDA GÓMEZ MARTÍNEZ



REPRESENTATIVE BODIES

MANAGEMENT TEAM [1]



1. The management team is made up of level 1 employees—people in leadership positions in each of the company's departments who report directly to the chief management. The persons included in this organization chart are the appointees at the moment this report was published.

HISTORY

A sustainable industrial project since 1977.

1977
Establishment of Talleres Ginés.

Kickoff of metallic manufacturing.

1984
First project for the aeronautical sector.

1986
Kickoff of composites manufacturing (Grupo Aries).

1987
AQAP Certification.

1988
A310. Elevator parts and structural repair station.

A320. Elevators.

1989
Kickoff of Aerostructures (Aerosur).

CN235. Central box structural assembly and tip wings integration.

IPTN (Nurtanio): manufacturing of two aircraft per year.

1990
Kickoff of Aeroengines.

ITP // EJ200 Nozzle Mechanisms.

1991
A330 and A340. Leading Edge Ribs.

1994
Components for satellites.

Hispasat Satellite (SENER). Baffle disc.

Integral Satellite (GACE): masks.

1997
Sikorsky. Horizontal stabilizer and ATT parts.

Embraer 145. Flaps.

1999
Dornier 728. Spoilers, elevator, rudder and ailerons.

A320. HTP Detail Parts.

2000
Manufacturing of C295 prototype.

Integration of CN235 aircraft.

2001
NH90. Vertical Tail Plane.

2002
A380 - Zone 2 Belly Fairing, Rudder and Elevator.

A320. Main Landing Gear Doors.

2003
A380. Ribs, wing braces and HTP.

2004
F7X. Elevator.

EFA. Fairings and HTP.

A310 MRTT.

2005
Trent 500. Casings.

A400M. Sponsons, Rudder Spar, Fixed Vane & Flaps.

2006
B737 - Rudder.

Trent 1000 - TBH structural components.

2007
A330 MRTT - Fuel system structural elements.

Sukhoi 30 – Pylon.

2008
A350 XWB VTP.

NH90. Sponsons.

Takeover of Grupo Aries.

2009
A350, XWB- Section 19.

A320. HTP Skins & Spars.

2010
A320. HTP Integration.

A380 - Section 19.1 APU Air Intake.

Aerosur takeover.

2011
KC390 - Wing Fuselage Fairing (WFF).

A380 – Zone 3 Belly Fairing.

2012
B777. Flaperon Skins.

HISTORY

A sustainable industrial project since 1977.

2013

ISO 14001 Certification.

LEAP 1B. TRV Shrouds & Platforms.

A400M. Ras Wedge.

2014

LEAP X. SP5/FHF.

B787. Passenger Door Surround.

A350. Outboard Flaps.

2015

B787. Keel Beams and Keel Shear Ties .

Beluga XL. Ventral Fin, HTP Box Extension & Auxiliary Fins.

2016

VTP Dorsal Fin A320.

LEAP X. Brackets.

2017

OHSAS 18001 Certification.

HTP Auxiliary Fins & Ventral Fins Beluga XL.

First direct delivery to Rolls Royce.

2018

LEAP 1B-SP5.

LEAP 1A-VBV DUCTs.

A330- Outboard Aileron Spars.

2019

Acquisition of Acatec Aeroassembling (Aciturri Getafe).
Acquisition of Alestis Aerospace.

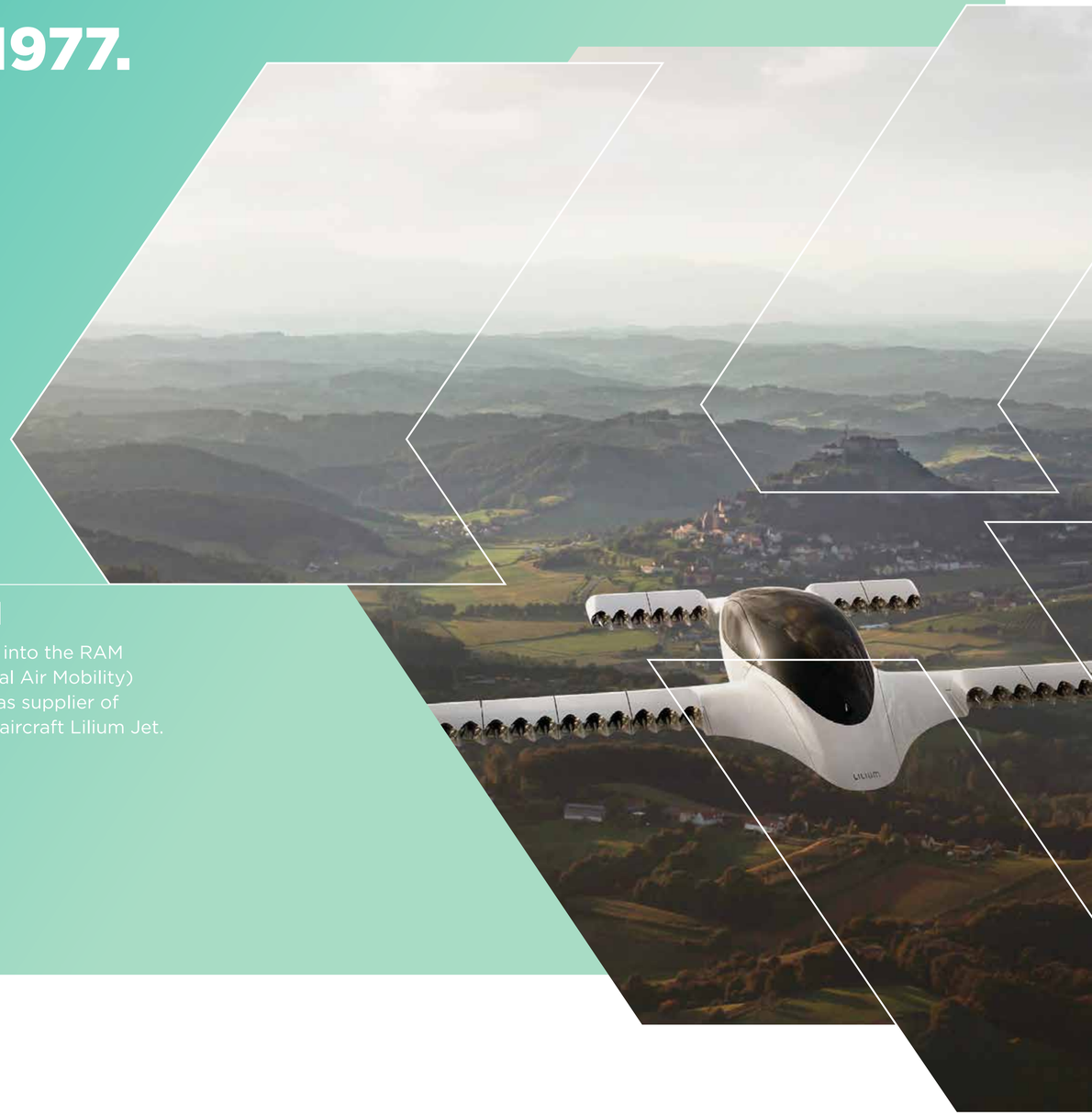
First contract for aircraft parts by additive manufacturing.

2020

Development of the first jobs in the Regional Air Mobility division.

2021

Coming into the RAM (Regional Air Mobility) market as supplier of electric aircraft Lilium Jet.




Design, manufacturing
and assembly of
aeronautical structures and
manufacturing of aircraft
engine components.

GLOBAL FOOTPRINT

WE ARE HERE

We have 84,000 sqm (20 acres) in Spain devoted to the advanced development of aerostructures and engine components

10 production centers.





GIJÓN (ASTURIAS)
Engineering
Innovation
Process Engineering
Additive manufacturing

BERANTEVILLA (ÁLAVA)
Engineering
Metallic manufacturing
Logistics

MIRANDA DE EBRO (BURGOS)
Engineering
Metallic manufacturing
Assembly

IRCIO, MIRANDA DE EBRO (BURGOS)
Engineering
Metallic manufacturing

ORÓN, MIRANDA DE EBRO (BURGOS)
Engineering
Metallic manufacturing

AYUELAS, MIRANDA DE EBRO (BURGOS)
Engineering
Metallic manufacturing
Assembly

VILA NOVA DE GAIA (PORTUGAL)
Engineering
Metallic manufacturing
Composites manufacturing

BOECILLO (VALLADOLID)
Engineering
Composites manufacturing
Assembly

TRES CANTOS (MADRID)
Engineering
Product definition
Composites manufacturing
Assembly

GETAFE (MADRID)
Engineering
Assembly

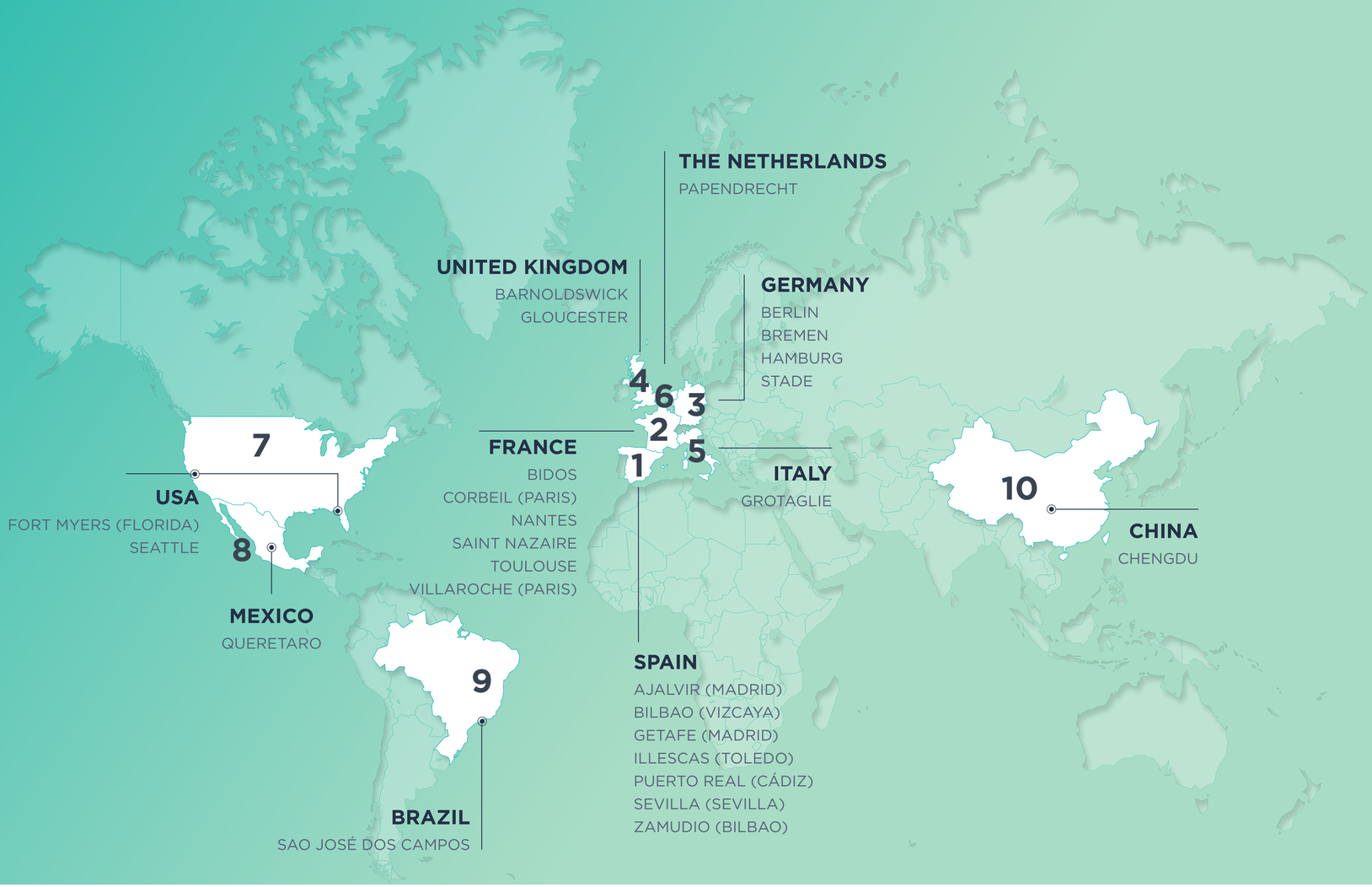
ALCALÁ DE GUADAIRA (SEVILLA)
Engineering
Assembly

LA RINCONADA (SEVILLA)
Engineering
Assembly

GLOBAL FOOTPRINT

PLACES WE SERVE

Aciturri's products are delivered worldwide to companies from the aerospace sector based in Europe, Asia and America, both aircraft engine manufacturers and OEMs (Original Equipment Manufacturer.[2]).



2. Benchmark companies in the aerospace industry such as Airbus, Boeing or Embraer.



Aciturri’s activities cover the entire value chain, from product design and definition to its final integration.

INNOVATION

Manufacturing for the future

PRODUCT DEFINITION

Conceptual design
Structural design
Calculations
Systems installation
MRB
Product support
Functional tests

PROCESS ENGINEERING

Definition of manufacturing processes
Concurrent engineering for materials and processes

TOOLING ENGINEERING

Conceptual and detailed design
Manufacturing
Management and implementation

METALLIC MANUFACTURING

Conventional machining and EDM
Welding
Painting
Heat treatment
Chemical treatments

COMPOSITE MANUFACTURING

Automatic lay-up
Manual lay-up
RTM
Hot forming

ADDITIVE MANUFACTURING

DMLS, metal and polymers
SLS and FDM technologies

ASSEMBLY

Equipped parts and subassemblies
Aerostructures assembly
Final delivery
FAL support
Mechanical and functional tests

CERTIFICATION

Product validation
Verification and compliance tests
Certificate of Airworthiness (CofA)

AFTER-SALES SERVICE

Modifications in airworthiness Spare parts and repairs
Product support


Sustainable solutions for
the aeronautical sector.

BUSINESS OVERVIEW

THE COMPANY, BUSINESS DEVELOPMENT AND MAIN CLIENTS

At every step, Aciturri lays down criteria regarding sustainability, efficiency, profitability, quality, and productivity.



BUSINESS OVERVIEW

THE COMPANY, BUSINESS DEVELOPMENT AND MAIN CLIENTS

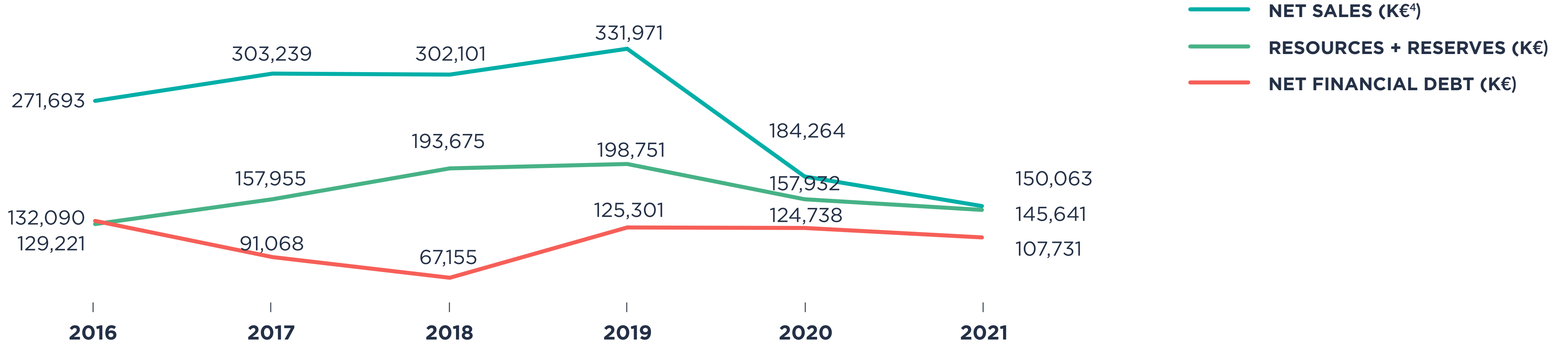
BUSINESS DEVELOPMENT

1977
FAMILY-RUN COMPANY FOUNDED IN 1977

84.000 m²
WORTH OF FACILITIES (20 ACRES)

1.175
EMPLOYEES

€150M[3]
TURNOVER [APPROX. $158M]



MAIN CLIENTS

AIRBUS
BOEING
GKN
SAFRAN AIRCRAFT ENGINES
Rolls-Royce
DAHER
AIRBUS DEFENCE & SPACE
ITP Aero
SAFRAN LANDING SYSTEMS
EMBRAER

3. M stands for “million” here and throughout the document.
4. K stands for “thousand” here and throughout the document.

BUSINESS OVERVIEW

VISION, MISSION AND VALUES

MISSION

"TO OFFER OUR CLIENTS A **COMPREHENSIVE, COST-EFFECTIVE, DIFFERENTIATED AND CUSTOMER-DRIVEN SERVICE** THROUGH THE INNOVATION OF TECHNOLOGIES AND PROCESSES, THE GLOBALIZATION OF ACTIVITIES, AND THE DEVELOPMENT OF OUR PROFESSIONALS."

VISION

"TO BECOME AN **INNOVATIVE** AND WORLD-RENOWNED COMPANY FOR OUR **KNOWLEDGE AND TECHNOLOGICAL EXPERTISE** IN THE **AERONAUTICAL SECTOR."**

VALUES

TRANSPARENCY, RESPECT, DYNAMISM, COMMITMENT, FLEXIBILITY, AND VALUE CREATION.

CORPORATE PRINCIPLES

- VALUE CREATION
- DEDICATION TO SERVICE
- TEAM BUILDING
- SAFE COMPANY
- CARING FOR THE ENVIRONMENT
- RELATIONSHIP WITH OUR SURROUNDINGS
- SOCIAL ACTION

BUSINESS OVERVIEW

BRANDS

ACITURRI

ACITURRI
AEROSTRUCTURES

ACITURRI
AEROENGINES



BUSINESS OVERVIEW

AEROSTRUCTURES

Aciturri has taken the necessary actions to prepare the company for the confirmed rate increases on single-aisle aircraft.



Throughout 2021, Aciturri has continued working to honor all the commitments with our customers. In a scenario where new competitors arise within the industry, it is essential that we find fellow travelers with whom we could collaborate to provide the aerospace market the solutions it will need in the future.

In 2021, we completed most of our industrial footprint reorganization activities to better adapt to the new situation brought about by COVID in the aeronautical sector. We also took the necessary actions to prepare the company for the confirmed rate increases on single-aisle aircraft, without losing sight of the anticipated rate increase on twin-aisle aircraft.

Additionally, in 2021 we implemented several projects related to the strategic diversification plan. We signed an important contract with Lilium for one of the key eVtols (short-distance electric transport) projects. The first stages of the product industrialization began last year and will allow us to obtain relevant turnover quotas in this sector from 2023 onwards.

In order to satisfy the entire value chain of the products we delivered, from the supply chain through Aciturri to the end customers, in 2021, the company implemented the QUALITY FIRST project, of utter importance to ensure that our products meet our clients' requirements. The Programs team provided the necessary support to ensure that both mass-produced and new products are designed, manufactured, and delivered in compliance with current and future quality standards.

In the Airbus programs, we accomplished all the deliveries for the A320 family (single-aisle), and following the client's request, we started the ramp-up for this aircraft by taking important steps towards improving production management and implementing industrial solutions to increase the processes' capacity and robustness.

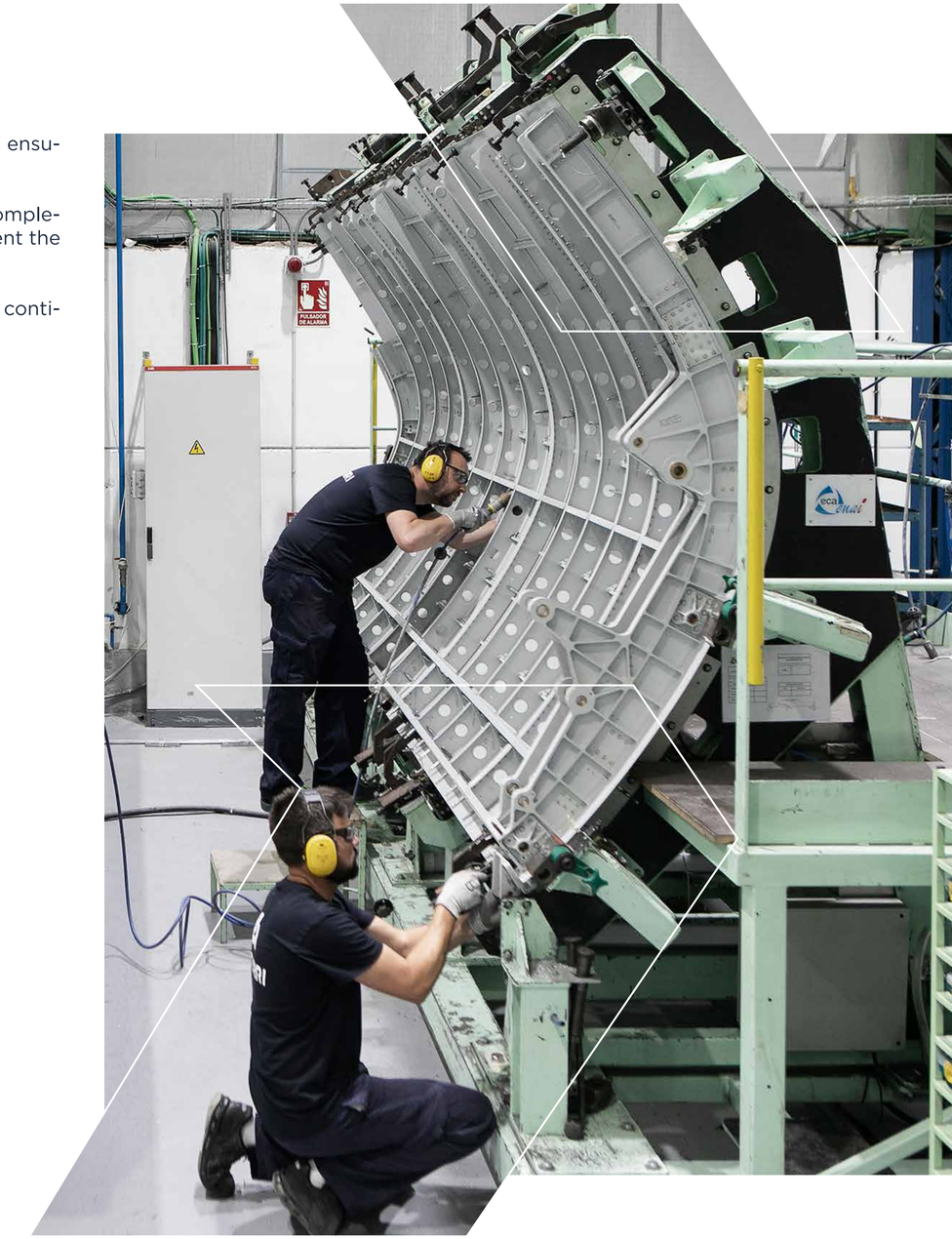
In the other Airbus programs, the demands were confirmed and Aciturri met all clients' needs successfully, including several product changes in the A350 program to improve the competitiveness of the aircraft. As for the Beluga XL, for which Aciturri designs and manufactures the Ventral Fin and Auxiliary Fin & HTP Box Extension packages, we delivered the fifth aircraft and defined the need for parts, as well as the increase in the demands required by this model.

As for the B787 programs, in 2021, Aciturri completed the contracts ensuring deliveries and a smooth transition to the new supplier.

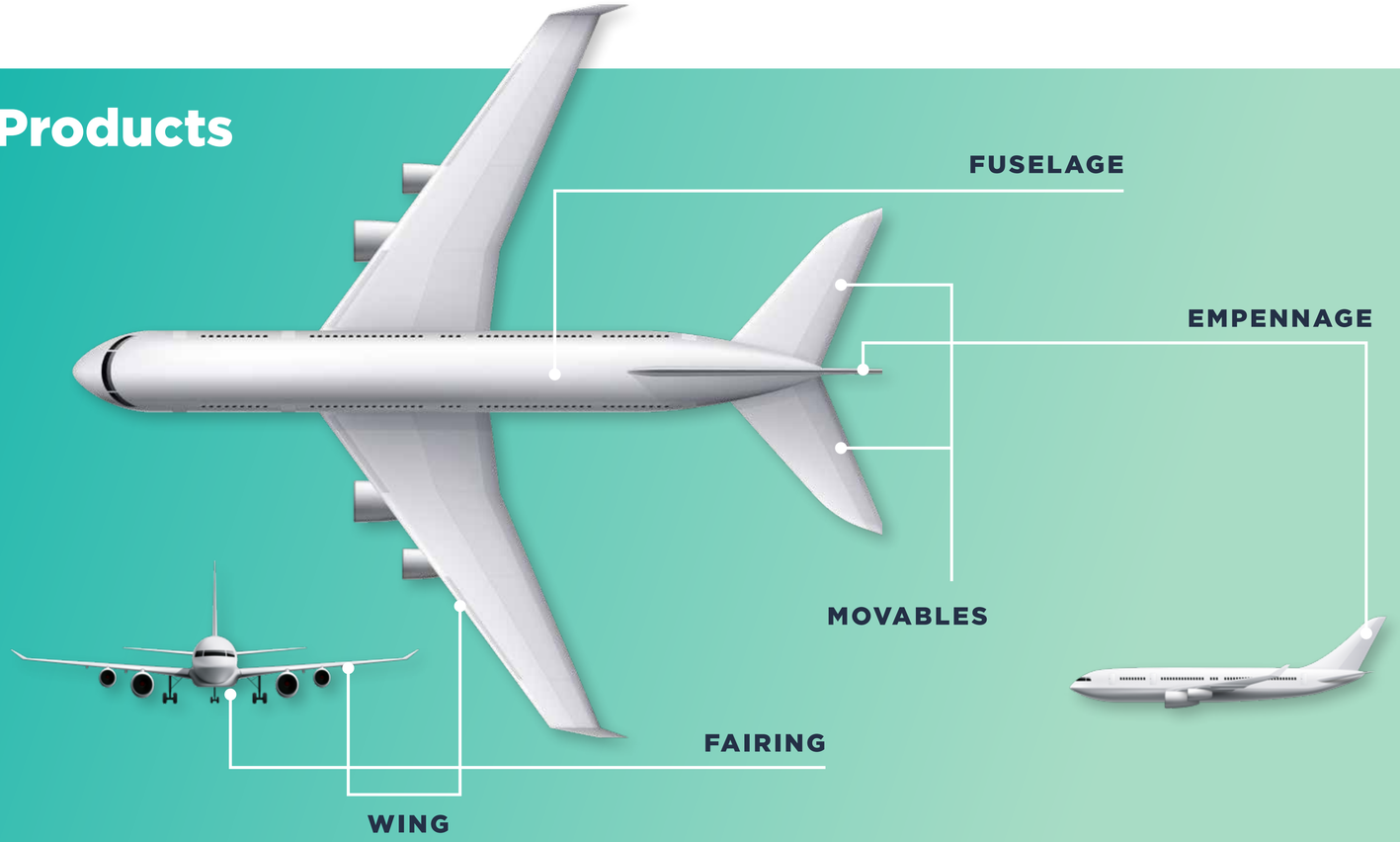
With regard to EMBRAER's C390 Millenium program, the company completed all planned deliveries and collaborated with the client to implement the changes the product requires to improve its performance.

For all other programs, Aciturri successfully did all the deliveries and continues to work with clients to seek improvements.

Benefit from the global nature of the industry to find partners to collaborate with.



Products



THE MOST RELEVANT

PROGRAMS

- A350 XWB
- B787
- B737
- A320
- A330/340
- F7X
- BELUGA XL
- A400M
- KC390
- C295
- NH90
- EUROFIGHTER

MAIN

CLIENTS

AIRBUS DEFENCE & SPACE

AIRBUS

BOEING

DAHER

EMBRAER

GKN

2021 TURNOVER

€130M [APPROX. $137M]

780 AIRCRAFTS

PARTS DELIVERED BY ACITURRI IN 2021

600 AIRCRAFTS
SINGLE-ISLE AIRCRAFT

120 AIRCRAFTS
TWIN-AISLE

25
HELICOPTERS

35 MILITARY
AIRCRAFTS

BUSINESS OVERVIEW

AEROENGINES

Early signs of recovery in the single-aisle aircraft market allowed a significant workload increase in the engine segment and improved expectations for the coming years.



As the year progressed, early signs of recovery in the single-aisle aircraft market allowed a significant workload increase in the engine segment and improved expectations for the coming years.

Against this backdrop, we managed to achieve a number of relevant milestones; namely, the approval of gates (client's validation of industrial and process capabilities) in the compressor rings of the PW800 programs, the first article inspection of the Business Jet rear mount rings or the approval of the rate proving of the casing for the Pearl 700 engine's low-pressure turbine.

Likewise, the team was able to contribute to the company's diversification objectives in the Space sector through the development of the Engineering Model 1 for Miura 1—PLD Space's suborbital launch vehicle—for which we manufactured parts and integrated them through welding processes.

Throughout the year, Aeroengines increased and improved its capabilities through the renewal of the Nadcap certification with excellent audit results in two technology areas: EDM (Electrical Discharge Machining) and NDT (Non-Destructive Test); the launch of investments for new machining equipment such as a Hermle C62 for the production of compressor casings (expected to be received in April 2022) and the reception of the eighth MCM Tank 1300 machine at the Ircio plant in Miranda de Ebro.

The reduction of travel restrictions throughout the year allowed us to welcome more clients into our facilities and go visit theirs, as well as to go to trade shows like the ACM Aerospace Alley in Connecticut, USA.

On a commercial end, Aeroengines strengthened its relationship with its main clients, which led to increased responsibility in several jobs and a few new contracts. In the engine division, LEAP1A increased to 100% its share in small machining components for the transmission structures, incorporated new brackets into its portfolio, and was awarded the development of the modification for the new Service Panel, an oil tank component.

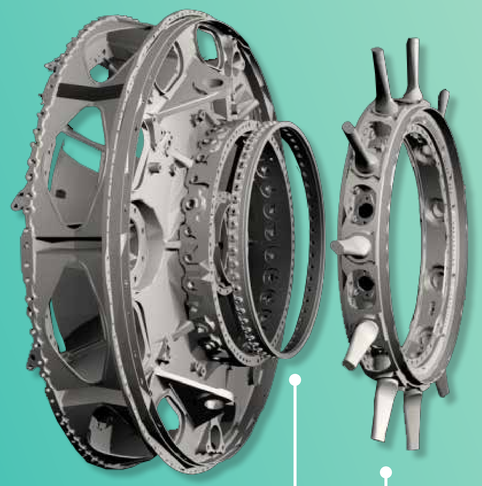
In 2021, we were also awarded the development of the rear mount ring component for 2022 and 2023. This is a titanium structure for the Falcon 10X business aircraft's new engine which will be developed at the Ircio plant.

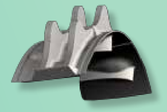
Aeroengines strengthened its relationship with its main clients, which led to increased responsibility in several jobs and a few new contracts.



Products









HPMC
High-Precision Machining Components

MANUFACTURED COMPONENTS

CASINGS AND RINGS

PRIMARY STRUCTURES

THE MOST RELEVANT
PROGRAMS

- LEAP 1B / 1A / 1C
- PW800
- TRENT 1000/7000
- TRENT XWB
- CFM56
- PW1000
- TP400
- EJ200
- TRENT 700
- TRENT 900

MAIN
CLIENTS

SAFRAN AIRCRAFT ENGINES

ITP Aero

Rolls-Royce

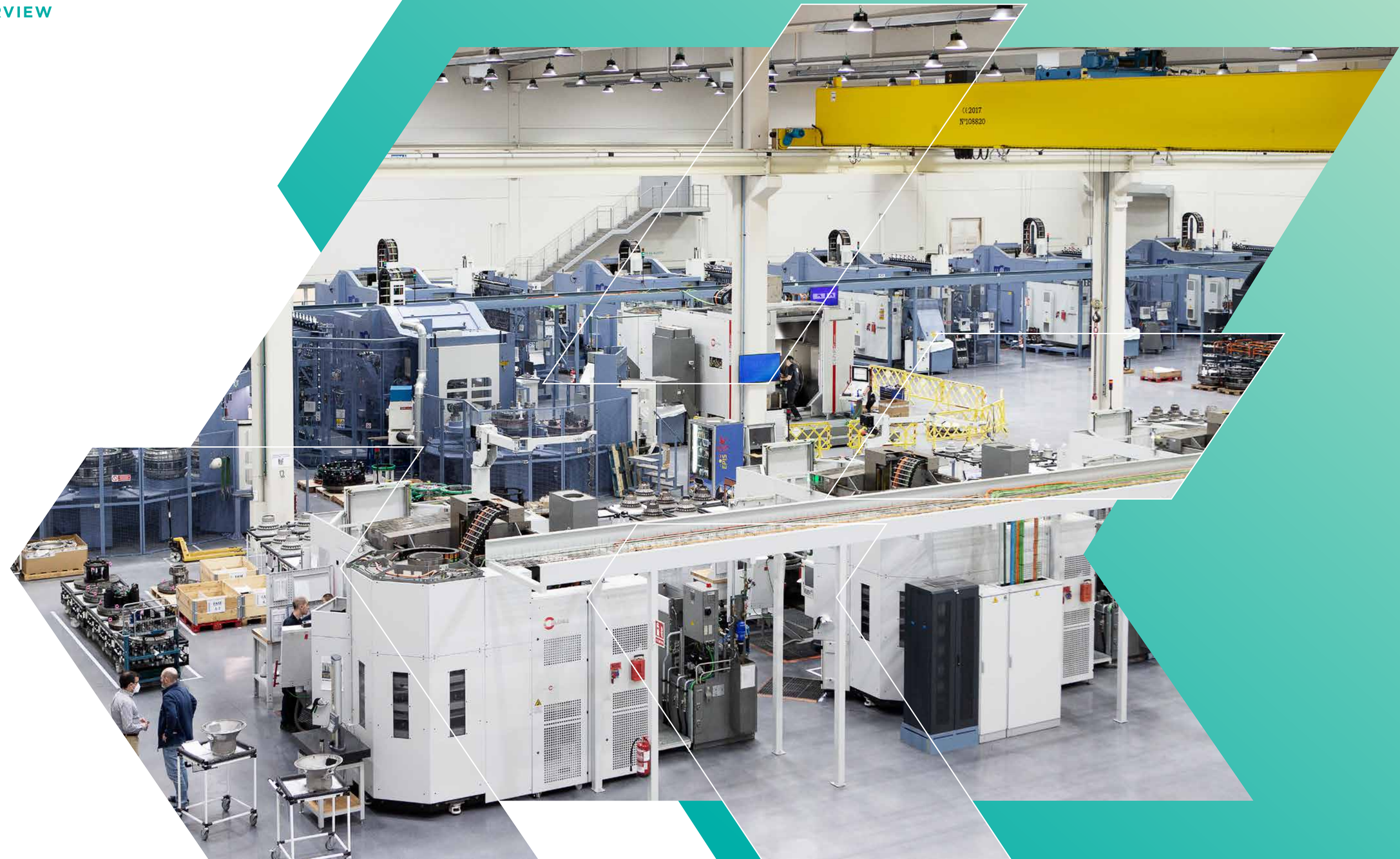
SAFRAN LANDING SYSTEMS

SAFRAN OIL SYSTEMS

2021 TURNOVER
€20M [APPROX. $21.1M]

42,402 ENGINE COMPONENTS
DELIVERED IN 2021

481	936	739	40,246
CASINGS & RINGS	ENGINE STRUCTURES	HUBS O SMALL STRUCTURES	MEDIUM COMPLEX MACHINING COMPONENTS


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N°105820

BUSINESS OVERVIEW

RESULTS

(Data in thousands of euros)	2016	2017	2018	2019	2020	2021
Funds (including capital grants)	148,014	174,217	206,963	205,774	163,683	152,711
Own funds (equity)	129,221	157,955	193,675	198,751	157,932	148,565
Resources	19,537	19,537	19,537	19,537	19,537	19,537
Long-term debt	141,478	108,739	78,071	168,898	183,367	169,374
Debt to companies from the cluster and partners	0	381	3,335	6,877	8,840	0
Short-term debt	45,460	37,591	34,825	20,578	40,334	25,298
Net revenue	271,693	303,239	302,101	331,971	184,264	150,063
Operational result	41,769	58,809	52,310	47,609	-6,203	-6,051
EBIT	34,335	41,635	49,973	42,371	-20,204	-12,204
EAIT [5]	33,866	30,838	37,773	31,076	-19,890	-9,367

5. All these earnings were generated in Spain.

BUSINESS OVERVIEW

ECONOMIC VALUE GENERATED AND DISTRIBUTED

	2016	2017	2018	2019	2020	2021
DIRECT ECONOMIC VALUE GENERATED (k€)[6]	271,964	304,083	302,925	333,101	185,555	150,165
Revenue (k€)	271,964	304,083	302,925	333,101	185,555	150,165
ECONOMIC VALUE DISTRIBUTED (k€)	264,294	287,691	278,672	337,910	246,746	211,217
Gastos operativos (k€)	179,074	198,260	190,437	215,830	138,574	99,791
Employees' wages and benefits (k€)	52,764	58,315	58,308	69,203	61,343	51,332
Payments to capital providers (k€)	5,773	8,106	6,203	26,000	23,525	37,594
Taxes (k€)	26,666	22,967	23,667	26,828	23,311	22,443
Resources for the community (k€)	17	43	57	49	18	57
ECONOMIC VALUE RETAINED (k€)	7,670	16,392	24,253	-4,809	-61,216	-61,052

In 2021, Aciturri received € 406,328 (as opposed to € 1,069,068 in 2020) in the form of grants from different public institutions.

6. The different data between the net revenue (first table) and the revenue is due to the fact that the latter includes financial income.

BUSINESS OVERVIEW

SUSTAINABLE FUNDING

In 2019, Aciturri was granted a syndicated loan by several banks that was labeled as **“sustainable financing”** on the part of the correspondent bank (Banco Santander). This was done based on four sustainability indicators which, according to the bank, show the company’s commitment regarding sustainability.
These indicators are measured by an auditor sent by the bank at the end of each tax year. As long as three out of the four are complied with, the funding will maintain its “sustainable” status for the next 12 months.
In 2021, Aciturri met three out of the four established goals, which ensures continuity of our “sustainable financing” status. The non-compliance with the energy intensity ratio is linked to the reduction in workload brought about by the pandemic, which in turn led to a reduction in sales, without reducing energy consumption due to the need to maintain the facilities operational.

Funding continues to be rated as “sustainable”.

At the end of 2021, the renewal of the syndicated financing contract was signed, which updated the indicators and targets set to consider the financing as sustainable and make it valid from 2022 on. The new indicators and their reference values for 2022 are:

- **Energy intensity ratio < 0.68 GJ/€K**
- **Control of CO2 emissions (scopes 1 and 2) < 0.045 CO2/€K**
- **Accident Frequency Rate < 0.065**

INDICATOR	GOAL	2019	2020	2021	MOTIVATION
% OF PERMANENT CONTRACTS	>80%	83%	93%	96%	It reflects the company’s commitment to the workers and their employment stability.
ENERGY INTENSITY RATIO	<0,75 GJ/K€	0.49	0.66	0.87	It measures the effectiveness of the actions implemented to reduce the environmental impact of the organization.
CONTROL OF CO_2 EMISSIONS (SCOPES 1 AND 2)	<0,05 tCO_2/k€	0.045	0.045	0.047	It enables the company to play an active role in the fight against climate change.
ACCIDENT FREQUENCY RATE	<0,10	0.06	0.052	0.056	It shows Aciturri’s commitment to the safety of its employees.

BUSINESS OVERVIEW

CLIMATE CHANGE MITIGATION

The aerospace industry is tackling an ambitious transformation process with clearly defined challenges in the European Union to achieve **climate neutrality by 2050.**

In 2021, Aciturri ratified its commitment to the development of a sustainable aeronautical industry by promoting **Clean Aviation** as a founding member, the reference public-private initiative within the European Union for the development of new aeronautical technologies with the aim of achieving a net reduction of greenhouse gases (GHG) of no less than 30%. This position allows the company to participate both in the decision-making and in the execution of projects for the development of technological solutions aimed at reducing the emissions of future aircraft on three pillars: hybrid electric aircraft, ultra-fuel-efficient aircraft, and hydrogen propulsion.

As for the development of new products and the improvement and implementation of new processes, the company team is very active and always in close collaboration with clients, research centers, universities, and other companies in the sector. In addition to the seven **R&D&I** projects in which the company was already involved, six more were added in 2021 (see section “R&D&I Initiatives”), in diverse areas such as the development of solutions based on thermoplastics, the improvement of the performance and durability of composite components, or the development of new processes for the manufacture of large integrated structures in composite material for the new generation of zero emissions aircraft.

In the current context of industry transformation, **hydrogen** has become the main alternative to fossil fuel use. Based on that, Aciturri set in motion several projects both for the development of hydrogen storage and transport solutions and for in-flight storage to facilitate the transition to long-range hydrogen-powered flights.

At the same time, the company is helping to accelerate the development of new concepts of **sustainable mobility.** From February 2022, Aciturri is a reference supplier of the structure (fuselage, wings, and canard) for the Lilium Jet, the first vertical take-off and landing aircraft with zero emissions and powered solely by electric energy. Aciturri also joined bound4blue’s capital to support a project to develop and implement rigid sails in the maritime transport industry with the aim of increasing wind propulsion.

We are aware of the impact on the communities in which we operate, that is why since 2016, we have used our **carbon footprint** as the main indicator of our environmental impact (see section “Carbon Footprint & Other Atmospheric Emissions”). Since then, the company has taken steps to develop a comprehensive analysis process that allows the identification and calculation of the full scope of our carbon footprint, including not only direct emissions, but also those which are not directly related to manufacturing, known as indirect emissions from the operations or scope 3. Once the verification process was approved by an independent third party that guaranteed the precision of the methodology used, Aciturri addressed the process of registering its carbon footprint with the Ministry for Ecological Transition and the Demographic Challenge—MITECO in Spanish—(already included in the Register, at the time this report was finished), and continues to work to reduce its emissions through the internal plan of environmental awareness, called “Let’s Talk about Carbon”, the activation of energy efficiency plans, and the design of Aciturri’s future “Decarbonization Plan”.

The company uses carbon footprint as the operational main indicator of its environmental impact.



BUSINESS OVERVIEW

STAKEHOLDERS

[102-42] Establishing a stable and ongoing **dialogue model** with our stakeholders enables Aciturri to maintain a trust-based relationship with all those people, organizations, or institutions that affect or are affected by the company's decisions. This dialogue model establishes that stakeholders must be identified based on the criteria of closeness, influence, responsibility, and dependence, and prioritized according to factors of urgency, power, and legitimacy.

The information gained through dialogue with stakeholders enables us to have a reliable and realistic perception of the environment in which we operate, facilitating business development and identification of opportunities and threats.

In the past year, no changes were identified in the list of stakeholders or in the commitments made to them. Likewise, there are no changes with regard to communication channels and interlocutors.

Stakeholders	Commitment	Channel of communication
BUSINESS PARTNERS	Value creation in the short and long term. Implementation of best management practices. Timely information and equal conditions. Open, real, and close dialogue.	Managing Director Aciturri's Legal Consulting team Interlocutors: Managing Director and Corporate Officer, according to the relationships with partners protocol
EMPLOYEES AND THEIR FAMILIES	Continuity of the business project and employment stability. Recognition based on our commitment, performance and achievement of objectives. Equal opportunity and work-life balance. Continuing professional development (CPD). Guarantee of occupational health and safety. Ethical, responsible, social, and environmental behavior on the part of the company. Receptiveness to freedom of association and direct dialogue with the management. Compliance with the laws and the collective agreement.	E-mail address for general inquiries and complaints. about the Code of Conduct. NEXO, Employee Portal. JAM (internal social network). Escuch&Do. Handbook and protocol for new recruits and employees. Bulletin boards. Meetings with trade union representatives. Communication procedure and e-mail address for the Joint Prevention Service. Employee's day. Christmas party. Management forum. Annual Convention. Interlocutors: HR Officer for each plant, Head of Communications and CSR, and middle management

Stakeholders	Commitment	Channel of communication
CLIENTS	Strict compliance of the agreed requirements. A comprehensive, cost-effective, differentiated and customer-driven service. Implementation of quality processes that meet our clients' needs. Clear and accurate information on the commercial offer. Security guarantee of our products. Respect for the principles of responsible advertising. Customer service, open dialogue and an efficient management of problems and complaints.	Corporate website. Sustainability report. Program Directors. Customer satisfaction questionnaires. Reports of customer complaints. Regular meetings. Annual meetings between clients and major suppliers. Participation in trade fairs and business meetings. Involvement in industry associations. Interlocutors: Focal Point Program, Program Plant Manager, Chief Operations Officer, Quality Assurance Officer, Key Account Managers, Sales Officers, and Managing Director.
SUPPLIERS AND SUBCONTRACTORS	Responsible behavior. Promotion of business sustainability. Transparency and equal opportunity. Confidentiality. Recruitment of local suppliers. Dialogue and communication.	Audits/Assessments. Meetings with the SPACE association. Visits to the facilities. Corporate website. Sustainability report. Regular meetings. Regular electronic communications. Interlocutors: Supply Chain Management, Provisioning teams, and Supply chain Management.

Stakeholders	Commitment	Channel of communication
SOCIAL SETTING [7]	Timely and transparent information of the activities carried out and their environmental and social impact on the setting. Security of the facilities. Sustainability of the business plan. Ethical business practices. Compliance with the law and the Universal Declaration of Human Rights. Participation in training programs and projects that generate knowledge and innovation. Promotion of employment and job opportunities.	Visits to the facilities. Corporate website. Sustainability report. Press releases distributed to the media. Collaboration agreements with educational institutions. Involvement in the governing of educational institutions. Interlocutors: HR Officer for each plant, Head of Communications and CSR, and Head of Environmental Management.
INDUSTRY [8]	Promotion of fair competition and respect for our competitors' property rights. Fostering cooperation and partnerships, and sharing experiences between companies within the sector and other business organizations.	Taking part in industry associations such as PAE (Spanish Aerospace Platform), TEDAE, Hélice or HEGAN. Taking part in business organizations like the Chamber of Commerce, FAE or Empresa Familiar. Participation in meetings with competitors. Interlocutors: Sales Officers, Innovation Manager, Head of Communications and CSR.

7. This includes local governments, NGOs and foundations, educational institutions, the media, the environment, and society in general.
8. This category includes competitors, industry associations and other business associations.

BUSINESS OVERVIEW

SUPPLY CHAIN

The company seeks to develop the business fabric and promote job creation in the communities in which it operates.



BUSINESS OVERVIEW

SUPPLY CHAIN

The company purchases raw and auxiliary materials for our manufacturing process, as well as industrial supplies and tools. We also outsource some activities; namely, transportation, maintenance, testing, inspections and calibrations, ancillary services for the production, and the cleaning and security of our facilities. In 2021, we spent 46% of our supplier budget on materials, 48% on machines and services, and 6% on logistics.

66% of the budget allocated for supplies or outsourcing goes to local suppliers and local external suppliers (the same as in 2020).

57% of the budget allocated for supplies goes to suppliers that belong to national industry clusters (13% more than in 2020).

In accordance with **Aciturri's Purchasing and Subcontracting Policy,** we seek to develop the business fabric and promote job creation in the communities in which we operate. Therefore, whenever possible, we work with national suppliers and subcontractors. What is more, we promote the acquisition of goods between the companies that are part of the different industry clusters, for example TEDAE, Hélice o HEGAN.

Likewise, this Purchasing and Subcontracting Policy, in line with the **company's Code of Conduct** and Moral Management and Socially Responsible Policy, aims to encourage suppliers and subcontractors to comply with the basic standards or criteria concerning human and labor rights, as well as their employees' occupational health and safety; to respect the environment and show an ethical behavior; and to ensure the implementation and general awareness of the principles of the United Nations Global Compact.

At Aciturri, we continuously monitor our suppliers' performance and share a monthly report with each of them based on objective indicators. Also, the company has an assessing procedure in place which establishes the methodology used to perform a standardized evaluation of their industrial processes. It analyzes our suppliers' industrial capacity and identifies opportunities for improvement, with the ultimate goal of internally evaluating Aciturri's ability to meet the needs and expectations of our clients. The main tool in this process is **Aciturri Supplier Assessment (ASA),** which includes the evaluation of four aspects: processes, organization, tools, and indicators. Other tools are IPCA+, PMCA, TDCA, SPCA and SIA.

As a result of the assessment, a report is generated. It lists all participants, the opportunities for improvement that have been identified, the associated plan of action, and an overall assessment with the grades A+, A, B, C or D. The person in charge of this assessment keeps track of all this, paying special attention to the percentage of solved issues within the established time frame. From the first to the second audit, our suppliers' assessment improved by 28%, while from the second to the third, it improved by 20%.

Aciturri observes and overtly supports the **United Nations' Universal Declaration of Human Rights,** the social policy of the **International Labour Organization** and the **Ten Principles of the UN Global Compact.** This commitment leads to strict compliance monitoring of a series of basic criteria that both Aciturri and our suppliers and subcontractors fulfill. These relate, above all, to the fight against all forms of forced and compulsory labor; harsh or inhuman treatment of workers; the effective abolition of child labor; regularized employment; the freedom of association and the recognition of the right to collective bargaining; non-discrimination based on gender, age or any other personal traits; and wages and a work schedule that guarantee a decent life.

As stated in the Purchasing and Subcontracting Policy, Aciturri takes into account human rights when hiring suppliers for any type of work, and discards those that don't meet the company's high standards. Likewise, the company ensures compliance with the basic principles established by law in relation to occupational health and safety.

100% of our suppliers have been assessed and vetted according to ethical and social criteria.

100% of our suppliers and operations guarantee the right to freedom of association and collective bargaining.

100% of our suppliers have been assessed and vetted according to ethical and social criteria.

66% of the budget allocated for supplies or outsourcing goes to local suppliers and local external suppliers.

THE SAME AS IN 2020

57% of the budget allocated for supplies goes to suppliers that belong to national industry clusters.

13% MORE THAN IN 2020

Aciturri expects its suppliers to comply strictly with the labor and environmental legislation applicable in each case, developing unquestionable behaviors and attitudes in terms of respect for human rights and the environment, in accordance with the Company's Code of Conduct and its Purchasing and Subcontracting Policy. Likewise, Aciturri doesn't establish commercial relations with any organization that does not comply with the ethical and social principles set forth in this policy.



of our suppliers have been assessed and vetted according to ethical and social criteria.

of our suppliers and operations guarantee the right to freedom of association and collective bargaining.

100% of our suppliers have been assessed and vetted according to environmental criteria.

STAFF


Being one of the best companies to work for is one of Aciturri’s strategic guidelines.

STAFF [9]

Aciturri has 1,175 staff

964

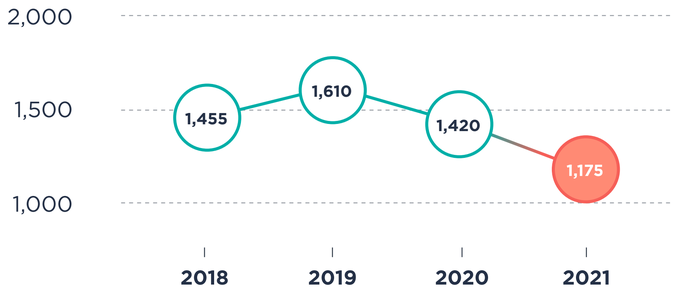
212

WITH AN AVERAGE SENIORITY OF

11.94

YEARS [10]

WORKFORCE BREAKDOWN 2018-2021





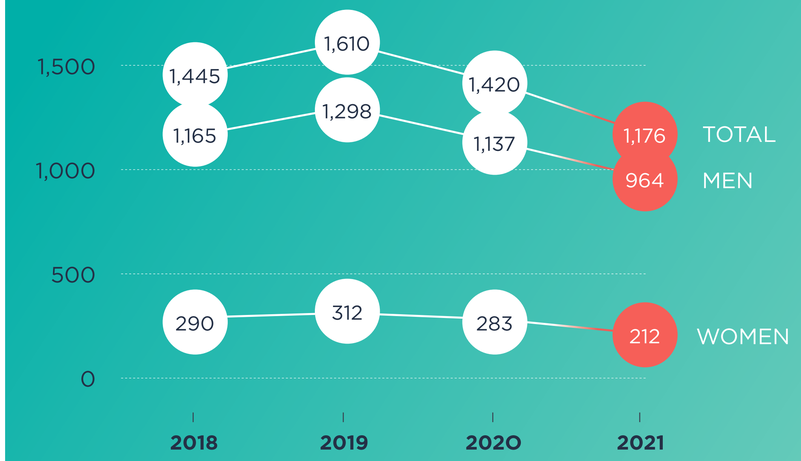
2021 WORKFORCE BREAKDOWN AND LOCATION

2	GIJÓN (ASTURIAS)
40	BERANTEVILLA (ÁLAVA)
61	GETAFE (MADRID)
180	SEVILLA (ANDALUCÍA)
244	BOECILLO (VALLADOLID)
318	TRES CANTOS (MADRID)
331	MIRANDA DE EBRO (BURGOS)

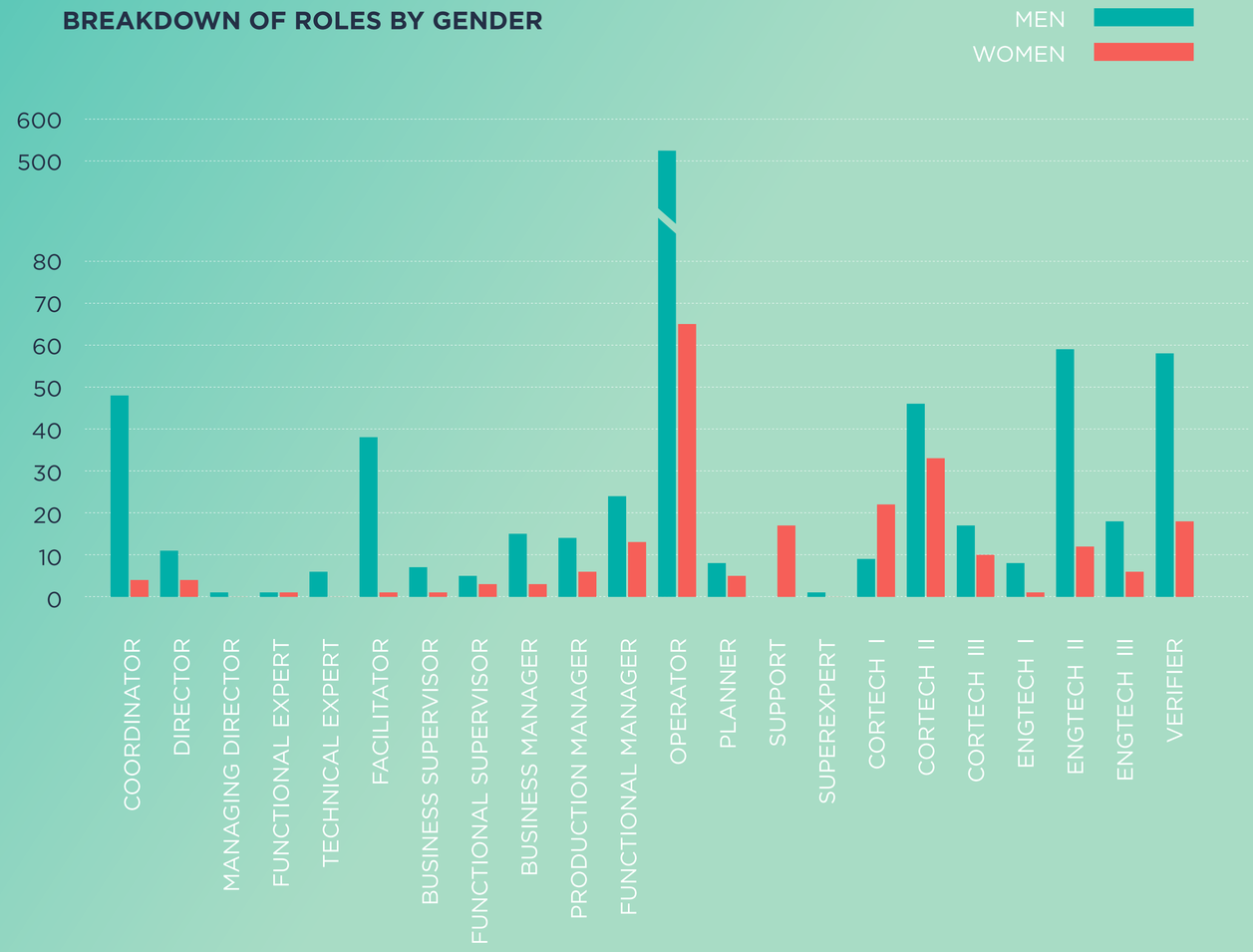
9. These data correspond to the average headcount from January 1 to December 31 of the year in question, unless otherwise specified. To calculate the data on average workforce, we counted the total days of employment for all the staff and divided them by 365.
There is no breakdown by professional category available because the large number of agreements applicable within the company makes it impossible to have data subject to be compared. However, where possible, data is presented by role.

10. Data based on the staff employed on 12/31/2021.

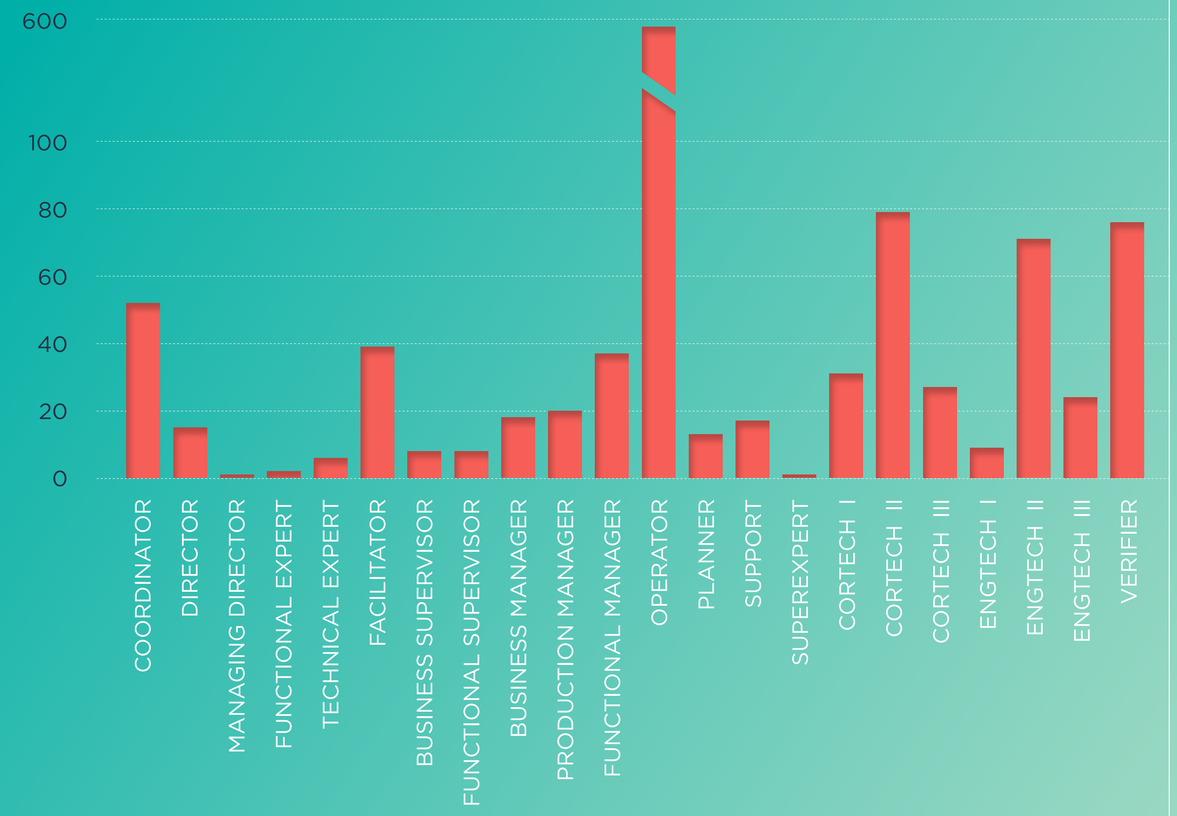
WORKFORCE BREAKDOWN BY GENDER 2018-2021



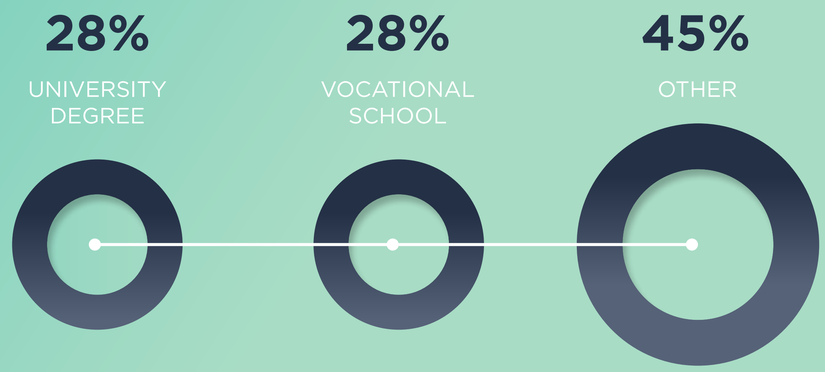
BREAKDOWN OF ROLES BY GENDER



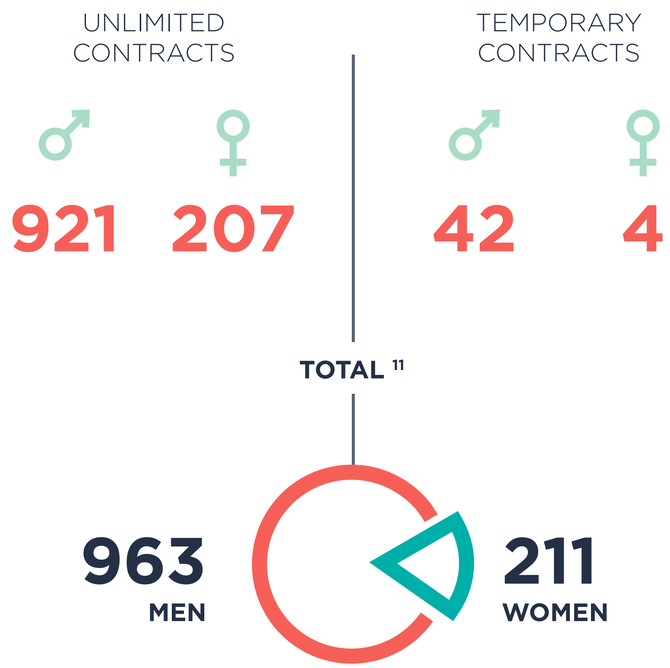
BREAKDOWN OF ROLES ON 12/31/2021



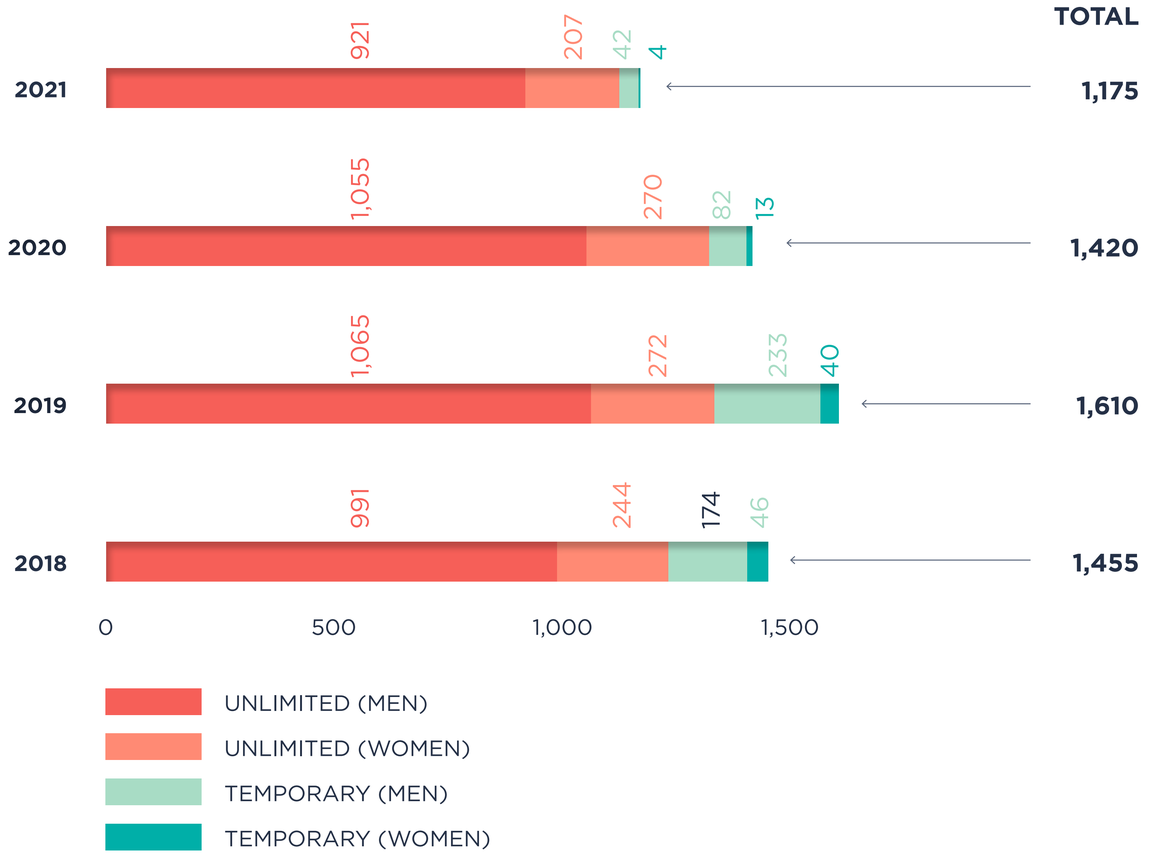
WORKFORCE BREAKDOWN BY LEVEL OF EDUCATION ON 12/31/2021



WORKFORCE BREAKDOWN BY GENDER AND TYPE OF CONTRACT

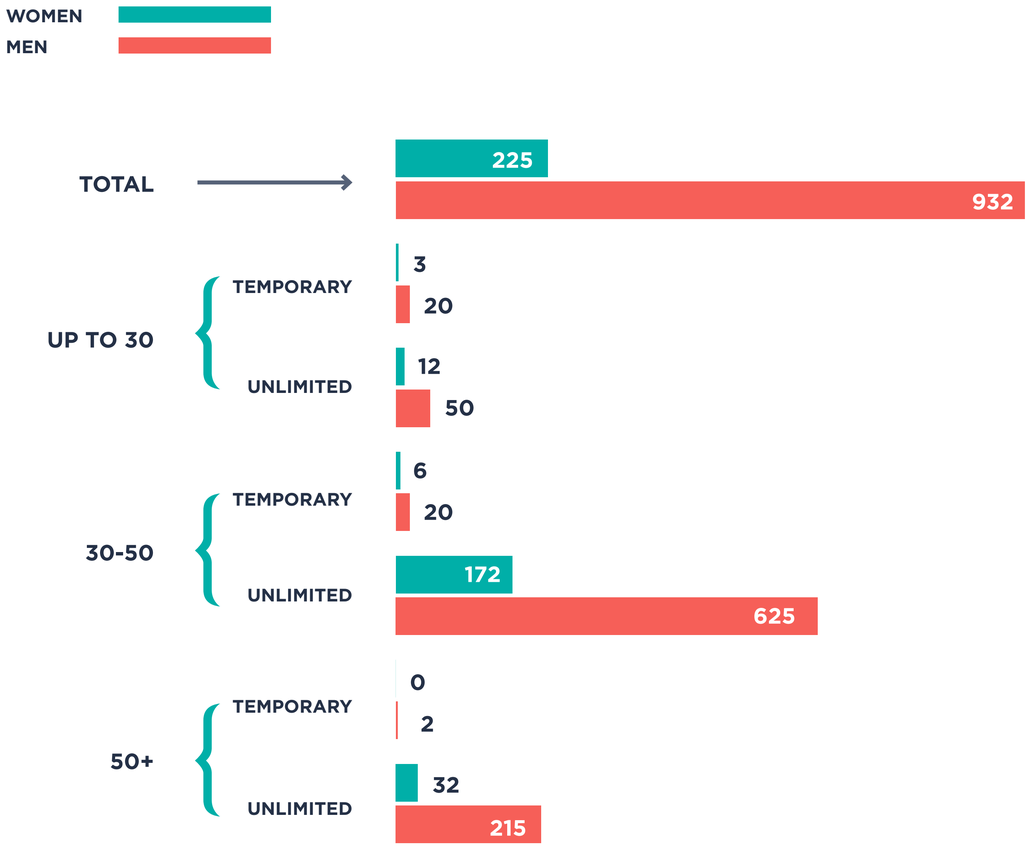


WORKFORCE BREAKDOWN BY GENDER AND TYPE OF CONTRACT 2018-2021

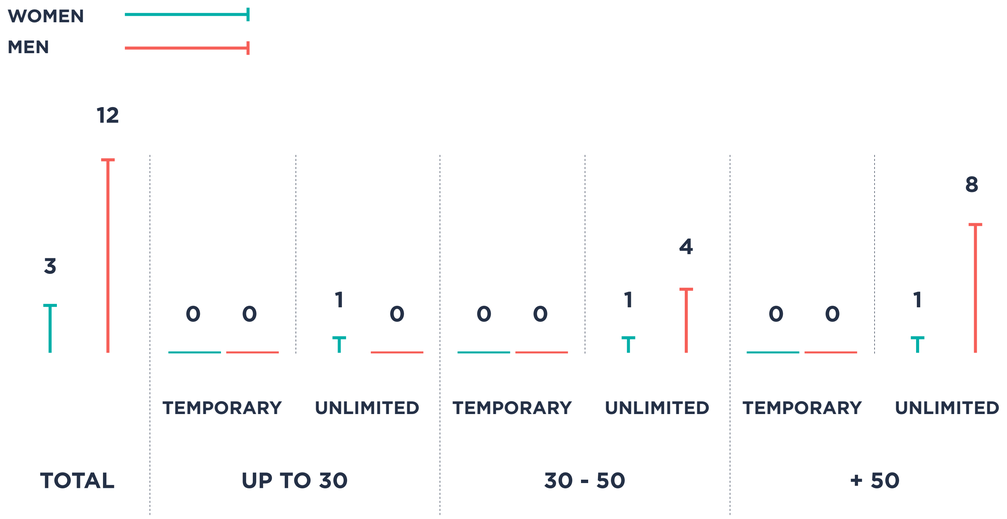


11. Data on average headcount, gender, and contracts have been retrieved from a report template generated by the automatic payroll (A3 Equipo), so they may not exactly match other reported figures obtained by different calculation methods.

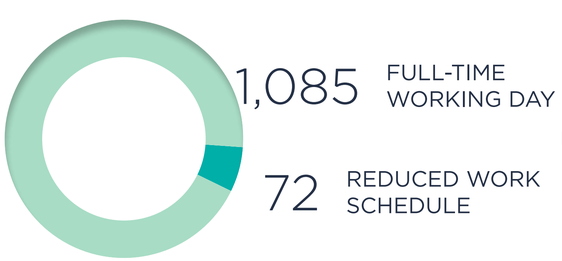
WORKFORCE BREAKDOWN BY AGE AND TYPE OF CONTRACT ON 12/31/2021



2021 PART-TIME CONTRACTS BY AGE AND GENDER



WORKING SCHEDULE ON 12/31/2021





187 FULL-TIME WORKING DAY

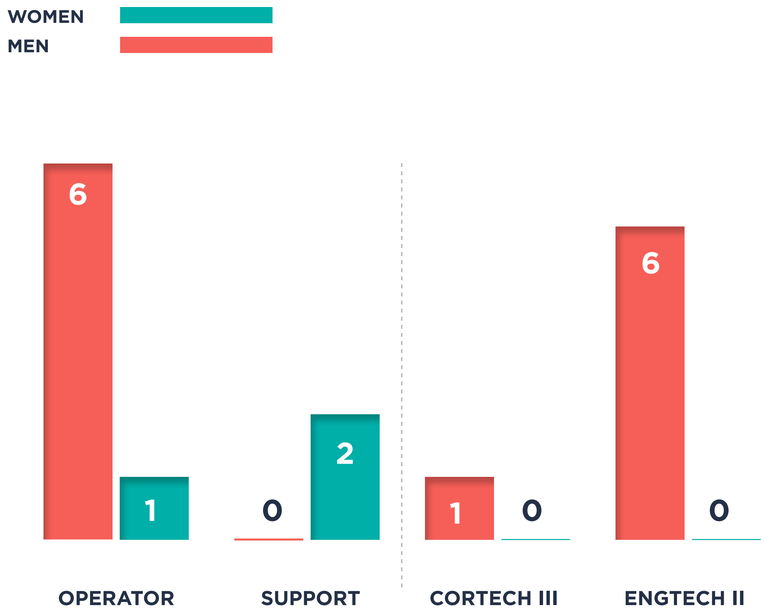
38 REDUCED WORK SCHEDULE



898 FULL-TIME WORKING DAY

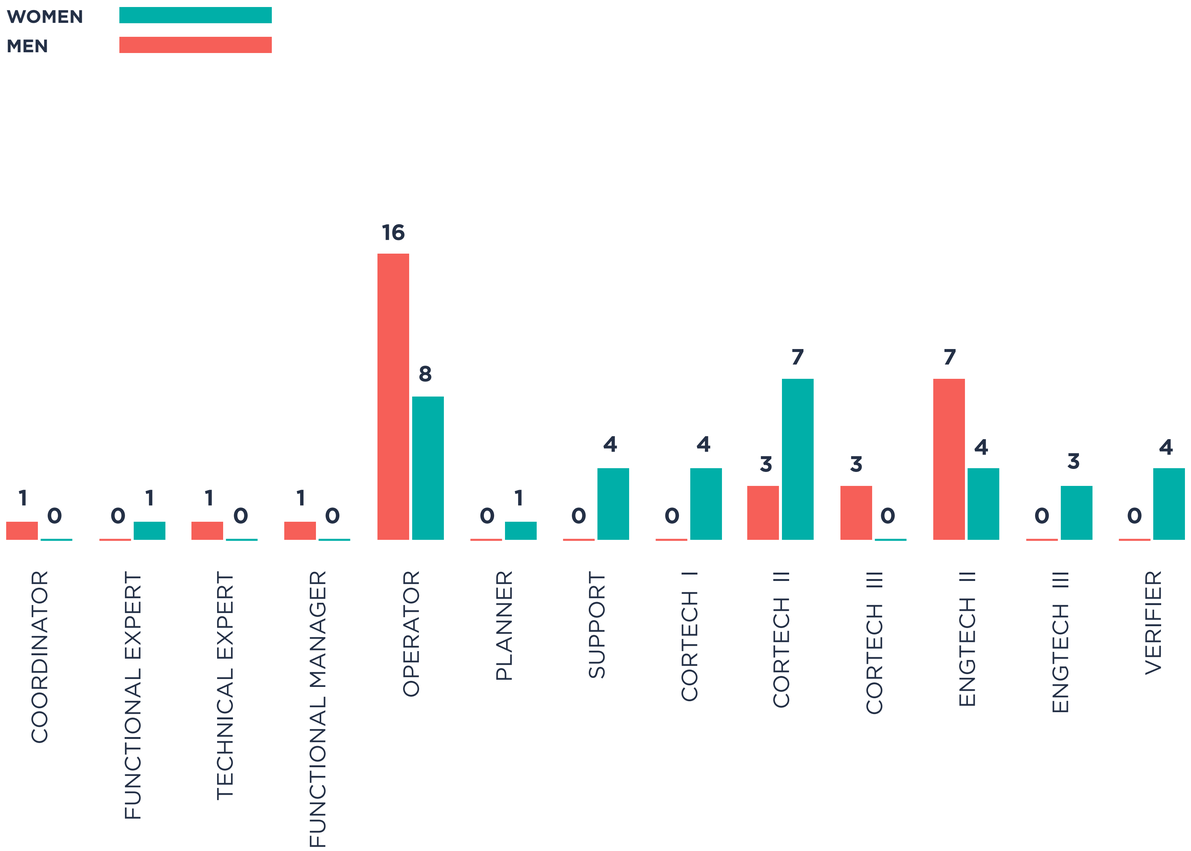
34 REDUCED WORK SCHEDULE

PART-TIME CONTRACTS BY ROLE



Aciturri always awards full-time contracts except in cases where the person requests a reduction of working hours for legal guardianship, partial retirement, or any other reason. The current 15 part-time contracts in the company are unlimited, 9 of them due to partial retirement.

BREAKDOWN OF PART-TIME STAFF BY ROLE

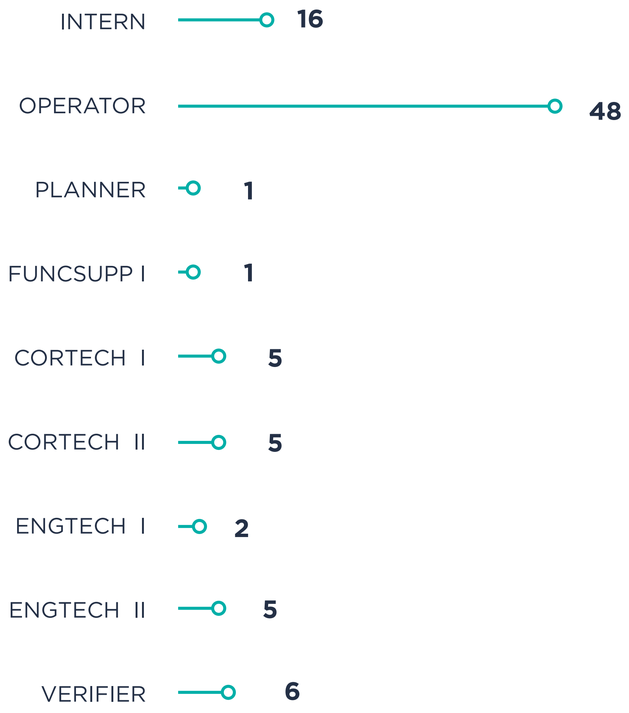


In addition to the staff directly employed by the company through a contract, we rely on outsourcing for ongoing services. A total of 111 people: 57 working on ancillary services for production, 35 on cleaning, 14 on security, and 5 on engineering. It also has operators from subcontracted companies (240), supply companies (281), and other personnel subcontracted for discontinuous services (20 people who take care of the maintenance of all machinery and tooling, four people who take care of the facilities, and one person who takes care of the computer systems).

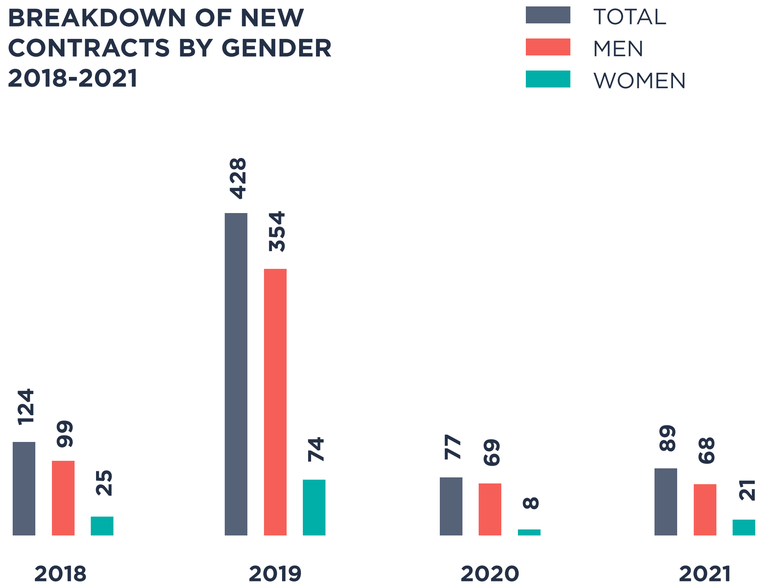
Our recruitment system combines **Aciturri's Employment Portal** with the use of corporate social networks to attract more and better-prepared candidates. Employees can help find new candidates through our **Referral Program.** Historically, Aciturri attends career fairs, presentations at training centers and universities, providing training in job centers and support with Bachelor's theses, involvement in dual training, and training programs that lead to employment within the firm.

However, 2021 was, again, marked by the COVID-19 pandemic. For the second year in a row, the declining workload and sales forced us to adapt our resources to ensure the continuity of the company through a personnel restructuring process. Therefore, no specific measures were taken to promote employment.

2021 BREAKDOWN OF NEW CONTRACTS BY ROLE



BREAKDOWN OF NEW CONTRACTS BY GENDER 2018-2021



Of the 89 new appointments given in 2021, 16 were from participants within integrated training programs through scholarships agreed with different universities.

Of the remaining 73 appointments, 35 were given between September and December to adapt to the production increases foreseen for 2022, a period which coincided with the early completion of the furlough scheme (ERTE in Spanish) in force at the plants in Ircio, Boecillo, Tres Cantos, and Sevilla.

BREAKDOWN OF NEW CONTRACTS BY AGE 2018-2021





As a result of the crisis which began in 2020, it was not necessary to adopt measures to promote employment, as there was no increase in the number of staff. In fact, in 2021, 111 people left. The reasons are as follows:

26 REDUNDANCIES
of which 5 were covered by the mass dismissal processes agreed in 2020.

37 TERMINATIONS OF TEMPORARY CONTRACTS.

1 DUE TO THE DEATH
of a worker.

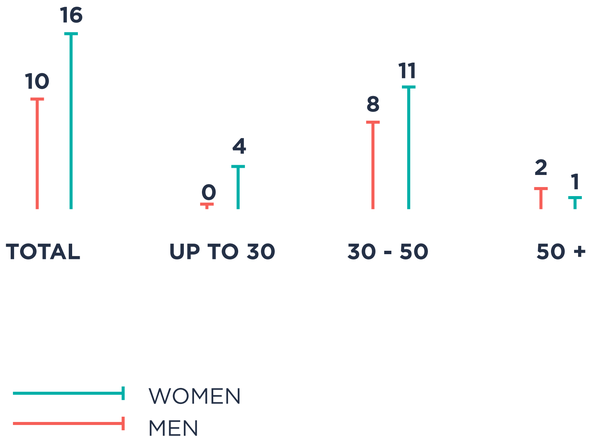
5 DECLARATIONS OF INCAPACITY
and/or completion of temporary incapacity.

12 LEAVES OF ABSENCE.

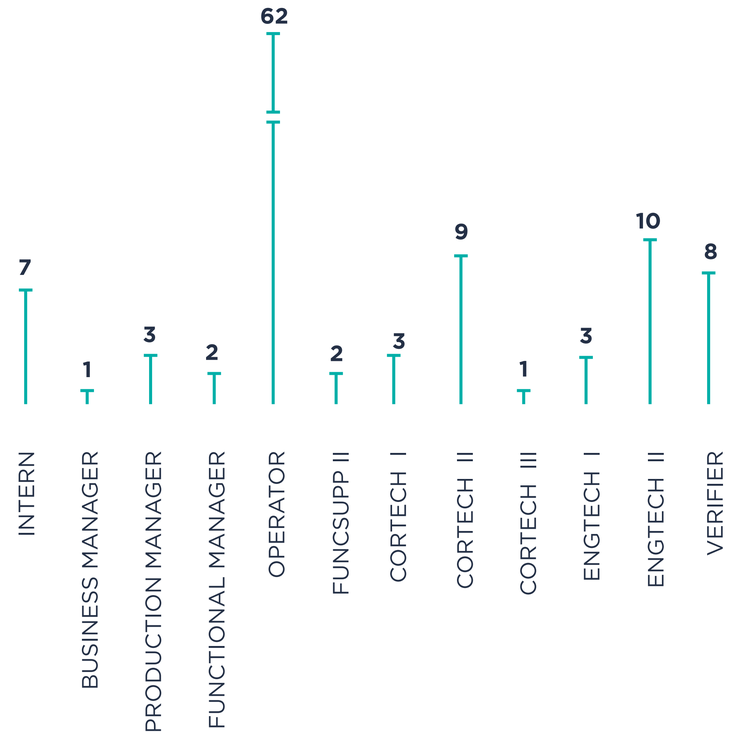
4 RETIREMENTS.

25 VOLUNTARY LEAVES

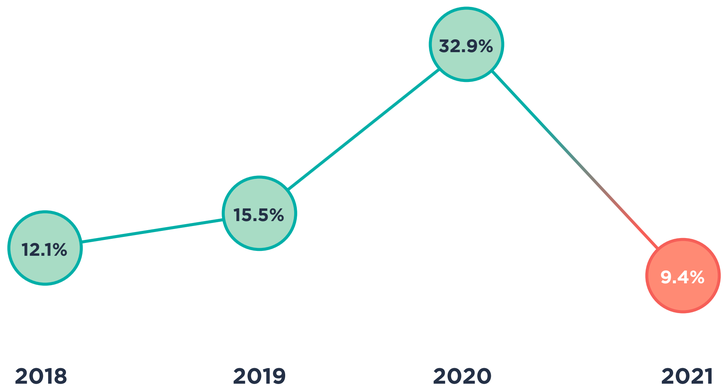
2021 BREAKDOWN OF DISMISSALS BY AGE AND GENDER



BREAKDOWN OF CESSATIONS BY ROLE



TURNOVER RATE 2018-2021



The 2021 turnover rate was

9.45%[12].

At Aciturri, we respect the rights of unionization, association, and collective bargaining within the existing law, as established in the **principle of protection of collective rights** in our Code of Conduct. According to this Code, relations with workers' legal representative organizations are based on mutual respect and call for an open, transparent, and constructive dialogue aiming at consolidating employment stability.

100% of the Aciturri's workers are covered by collective bargaining agreements—national or regional collective agreements that have been negotiated by social actors and employers. Although we don't have our own collective agreement, we have agreed on certain improvements on the provisions in these texts.

In all of Aciturri's companies there are workers' legal representative organizations which function as channels for social dialogue and negotiations.

Whenever operational changes which are likely to significantly affect employees occur, we proceed on the provisions of article 41 in the Estatuto de los Trabajadores (Workers' Rights Act), which deals with substantial changes in labor conditions.

In the event of an individual modification, the person concerned is notified at least 15 days prior to the effective date of the modification. When it is a collective modification, there is a previous period for discussions with the workers' representative body which shall not exceed 15 days. After this period, and depending on the results of the discussions, conversations with the affected workers start.

With regard to the furlough scheme negotiated in 2021, the situation is as follows:

ACITURRI AEROENGINES: furlough scheme valid until 31/12/21. At the Ircio plant, this was concluded earlier than anticipated, on September 2, 2021. At the Orón plant, it ended on December 31, 2021, as planned.

ACITURRI AEROESTRUCTURAS: during the first half of 2021, the furlough scheme agreed to within the labor force adjustment procedures negotiated in 2020 remained active. On May 12, 2021, the process of negotiation with the workers' legal representative organizations for a new furlough scheme started. On June 4, 2021, an agreement was reached for the implementation of a furlough scheme in all workplaces between July 1, 202 and June 30, 2022, with the possibility of extending it until December 31, 2022. This process could be completed early on the following dates [13]:

- **Tres Cantos plant on December 13, 2021.**
- **Boecillo plant on December 31, 2021.**

ACITURRI ASSEMBLY: on July 6, 2021, the process of negotiation with the workers' legal representative organizations for a new furlough scheme started. On July 14, 2021, an agreement was reached for the implementation of a furlough scheme between September 1, 2021 and March 31, 2022, with the possibility of extending it until June 30, 2022. The process was completed early on November 19, 2021.

12. Calculated as ("workforce cessations for the period / average workforce for the period) *100".
13. At the time this report was finished, the furlough scheme at the Ayuelas and Berantevilla plants will end earlier than planned, on February 6, 2022.

It should be noted that all the proceedings initiated in both 2020 and 2021 have been closed in agreement with the workers' legal representative organizations. Among other measures, these agreements included monetary compensations equivalent to those granted for unfair dismissal, with a maximum of €100,000 and a minimum of €6,000; the possibility for employees to join the plan voluntarily; and a nine-month Relocation Plan signed by Aciturri which committed to relocate 75% of the people affected.

80% of the people from Aciturri Aerostructures, Aciturri Aeroengines, and Aciturri Getafe who followed the Relocation Plan have already found employment: 117 out of 146 people who joined the program have gained new employment, mostly in companies in the logistics and distribution, and industry and construction sectors.

Aciturri's Human Resources team collaborated with Manpower, a consultancy firm specialized in this type of processes, to develop this program based on two main activities: workshops and individual sessions. The former were useful to develop skills related to the digital environment, communication, development of recruitment processes, interviews, and different types of tests. In the individual sessions, candidates were given information about their professional alternatives. They benefited from expert advice to analyze their own strengths and weaknesses and received some guidance around their training needs.

Aciturri Aeronáutica's affected workers were offered a relocation plan similar to the previous ones but tailored to their profiles. In this case, the HR team is being supported by the consultancy firm Auren. A total of six members of the Aciturri Aeronáutica's relocation plan have managed to rejoin the labor market and one person is still working on it and expects to do so in the coming months.



STAFF

TRAINING & DEVELOPMENT

Aciturri's employees carry out their professional activity in the most skilled way possible as a means to achieve excellence.



STAFF

TRAINING & DEVELOPMENT

Aciturri's Performance Evaluation System measures the individual annual contribution towards the company's success.

At Aciturri, employees carry out their professional activity in the most skilled way possible as a means to achieve excellence. Professionalism is one of the company's signature traits.

To assess the personal capabilities of each person, the company has a system in place which ensures individual merit is the sole criterion for recruitment. This is how we guarantee the same opportunities for access to employment and career advancement for men and women, as well as for people of all ages, ethnic origin, or any other diversity factor.

The tool we use for managing our staff is **Aciturri's Performance Evaluation System (SEDA in Spanish),** which measures their individual annual contribution towards the company's success. It is based on their level of achievement of the goals previously established and the given responsibilities according to the role they have been assigned. It also factors in their skills (both soft—personal, social, and group skills—and hard— thematic and business), as well as the expertise they've shown while performing their tasks. The evaluation system is a three-step process: agreement, midterm evaluation, and final evaluation. Both the employee and their direct manager are actively involved, and they collaborate with the HR team.

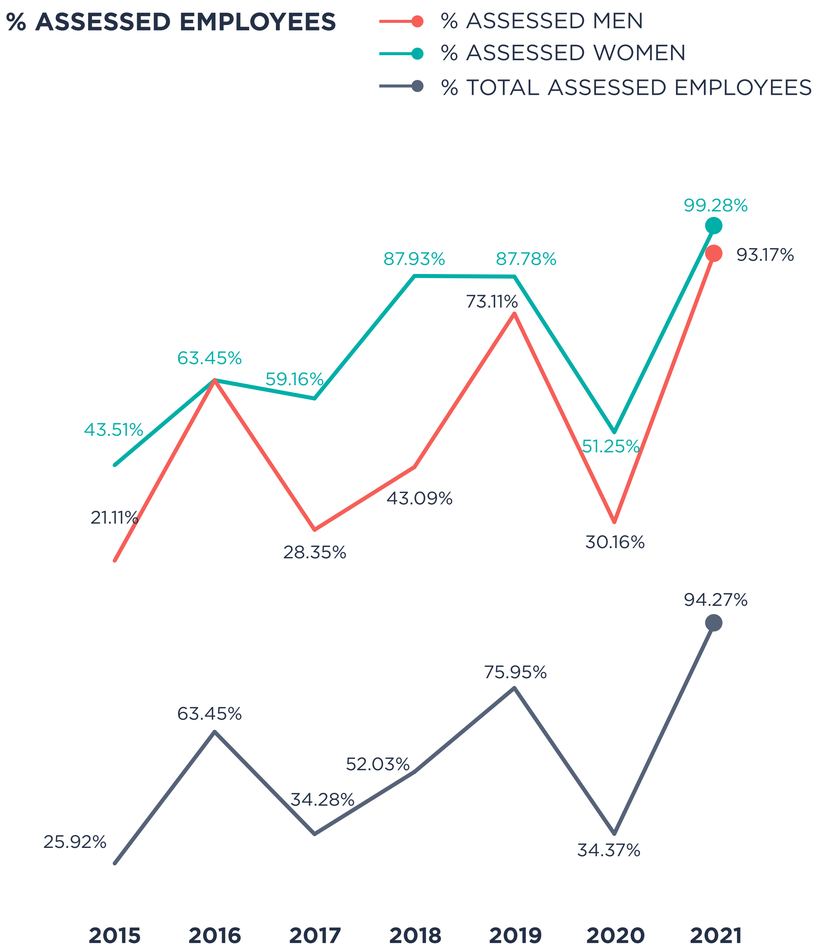
Success Factors is the development module that allows the automation of the performance evaluation process and a better analysis of the information generated by it and of the **Skill Matrices**.

The information obtained from this evaluation, together with other factors such as new investments and/or facilities, regulatory changes, or new projects, is taken as the starting point for designing the **Annual Training Plan.**

In 2021, 210 training activities were carried out, of which 98 were in-person, 12 online, and 100 through the Success Factor learning module.

We continued making progress in the **Kaizen** project at all levels of the organization, as well as in the **Occupational Risk Prevention** training linked to the legal requirement included in the National Metal Agreement.

It's worth mentioning our **English** learning program via two virtual platforms that combine sessions focused on theory with conversational hours with native speakers. In 2021, 140 employees enrolled in the program, and achie-



Training in English through two virtual platforms that combine theoretical classes and conversations with native speakers.

ved a significant improvement in their proficiency. Upon the request of the participants, the program will include new languages in 2022.

In May 2021, a new listening process was launched: **Escuch&do.** In this edition the survey was adapted and linked to the key moments that an employee goes through during their professional life. This methodology aims to understand what the person experiences (objective facts) and feels (subjective perceptions) at each moment and to identify the key aspects to improve the relationship model between the people and the company.

In addition, the Employee NPS was measured for the first time and the workers were asked for their feedback on how the company managed the pandemic.

60% of all employees took part in the survey.

A specific working group was created to analyze the results; it included the following divisions: Operations, Development Engineering, Product Definition Engineering, Supply Chain, Industrial Metal, Communications, and People. The group agreed to have six focus groups with a total of 50 employees to share the results, analyze them together, and define measures that could be included in the Action Plan.

With this information and the recommendations made by the consultancy firm who supported the development of the process, we drew up the Action Plan to be implemented in 2022, which includes measures related to development, working conditions, communication, and leadership.

In 2021, a total of 21,969 training hours were taught to the benefit of 105% of women and 82% of men on our teams.

DURING 2021

A TOTAL OF

21,969 TRAINING HOURS WERE TAUGHT

105% OF WOMEN [14]

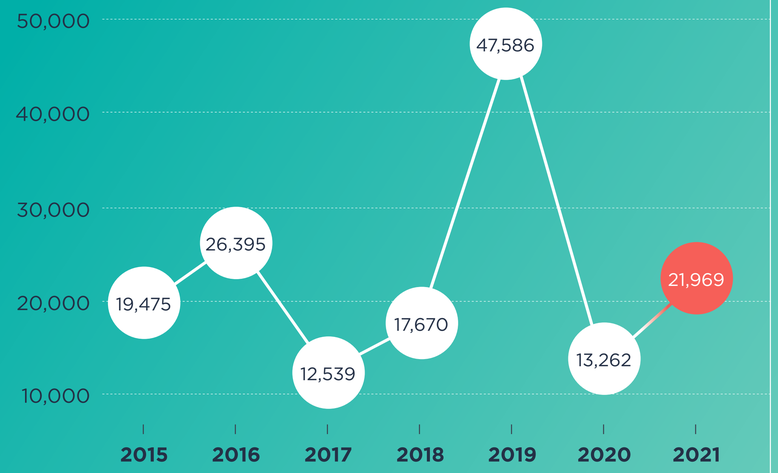


82% FO MEN

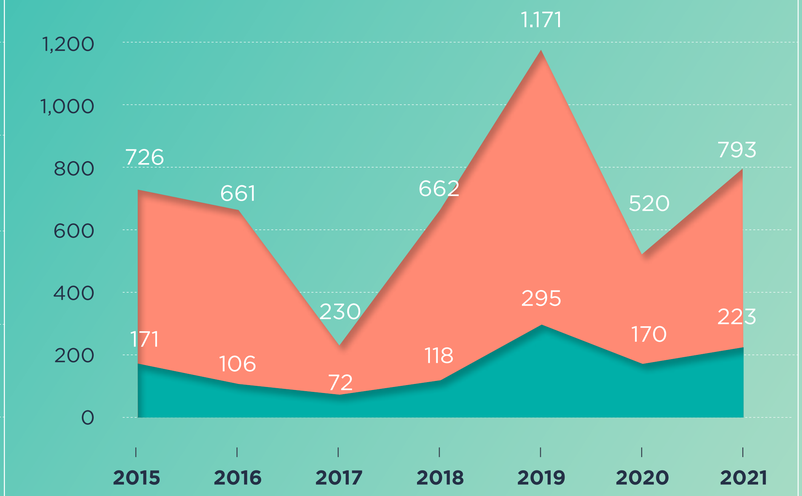


14. The percentage of 105% trained women is due to the fact that the percentage is calculated based on the average annual workforce and the number of people trained, regardless of whether they take a leave during the year.

TOTAL TRAINING HOURS



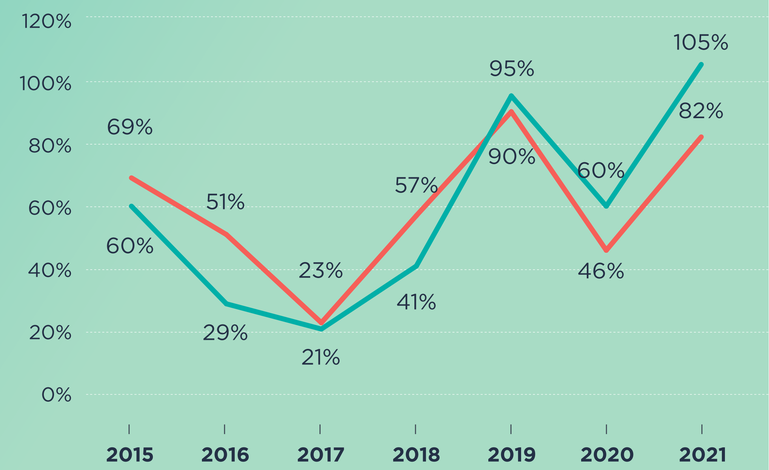
TRAINED MEN/WOMEN



TRAINED MEN

TRAINED WOMEN

% TRAINED MEN & WOMEN



% TRAINED MEN OUT OF ALL MEN EMPLOYED

% TRAINED WOMEN OUT OF ALL WOMEN EMPLOYED

2021 TRAINING HOURS BY ROLE



In 2021, Aciturri continued working with the **Learning Communities.** Specifically, three were developed: Finance team, Tres Cantos management team, and Development Engineering team. Each of them had different objectives and approaches, but without losing the essence of their goal—giving keys pointers for self-development and supporting other people's development.

We also progressed in the use of **PI® (Predictive Index),** an instrument that measures the reaction of individuals to stimuli in the environment. This assessment system provides a quick and accurate understanding of the motivational needs that guide people's behavior. The results show the intensity of the needs that motivate the individual's natural behavior, their effort to change and their adapted behavior in response to their perception of the demands of the work environment.

At Aciturri, this tool is used for recruitment and onboarding processes, management and communication, team building, conflict management, leadership development, coaching for performance excellence, change management, and human capital analytics.

In 2021, the PI® assessment was extended to the whole N2 level. Team feedback was provided to all management teams, while individual feedback was given to the participants to improve their own development. More than 80 people were involved in the process.

In 2021, Aciturri continued working with the Learning Communities.

STAFF

WORK-LIFE BALANCE

Flexibility in terms of remuneration, space and time.



STAFF

WORK-LIFE BALANCE

At Aciturri, we offer our employees a package of measures and benefits, including:

LIFE AND ACCIDENT INSURANCE

As per the various corresponding collective agreements.

TRESDÉ

a program focused on work-life balance

List of unpaid leave: to meet special personal needs such as assistance to sick family members (5 to 60 working days per year), extension of maternity/paternity leave (up to 10 working days per child), international adoptions (up to 30 working days), exam preparation (up to 5 working days per year), etc.

Flexibility workspace: as long as the job permits, employees may either work from home the first or last part of the day and spend the rest of the work day at the workplace, or work from home the entire day. Due to the COVID-19 pandemic, working remotely has become more and more common over the past two years, especially bearing in mind that it was a mandatory or priority measure in some periods.

Compensation in kind: all employees may choose to receive part of their salary in kind. Some of the options available are child care or restaurant vouchers, transport cards, health insurance, and training.

In addition, the indirect staff may benefit from flexible clock-in and clock-out hours and can choose a continuous workday on Friday and every day in the month of August.

The staff employed directly by the company works either split shifts Monday through Friday in one, two or three shifts, (morning, morning and afternoon, or morning, afternoon and night) or Monday through Sunday with a fifth shift in six working day-cycles followed by four days off. In any case, they have the option to request a fixed work shift or modifications in their current shift to tend to personal matters.

All employees can enjoy these benefits, whether their contracts are full- or part-time. Aciturri's Executive Committee also benefits from a company car and life insurance coverage.

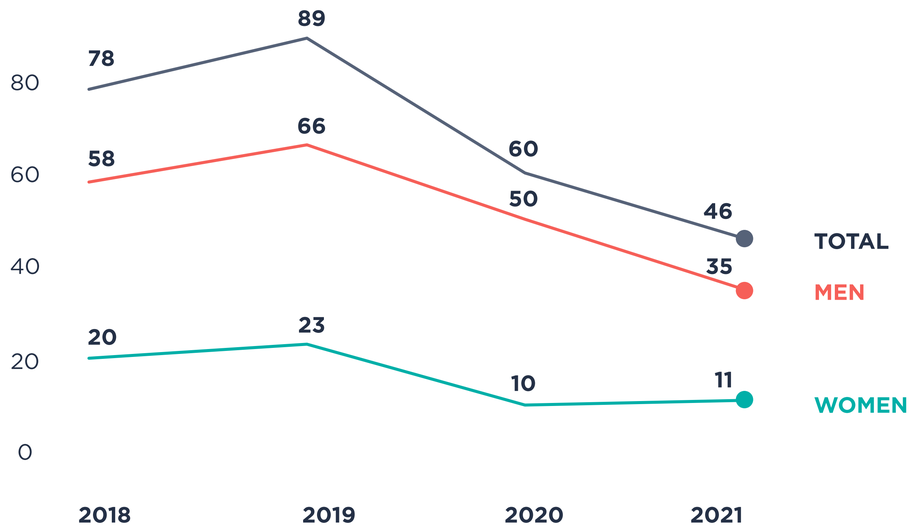
During the negotiation of the furlough scheme (ERTE in Spanish) in May 2020, we agreed with the Monitoring Commissions to draw up and publish **Digital Curfew Guidelines,** which have been in force for furloughed workers. Although compliance with the measure hasn't been audited, the instructions given to the Directors and the people responsible for the workers were clear and precise. There have been no complaints in this respect either from the workers or from their legal representatives.

In 2021, 46 people enjoyed **parental leave:** 35 men and 11 women. Of these, 34 (74%) are now back at work after their leave; 11 will be back once their leave runs out; and one (a man) did not come back because their temporary contract was terminated. Thus, the return rate was 97.14%.

All employees with a pending leave at the end of 2020 came back to work in 2021.

Of the 46 persons whose leave started in 2021, 45 remain with the company at the time this report was being written (one of them, a man, did not come back because their temporary contract was terminated). Of the 56 people whose leave started in 2020, 47 remain with the company after 12 months, 2 have left (a woman was made redundant, and a man was on leave of absence), and 7 of them are still within the 12-month period. Of the 11 leaves from 2019 pending analysis, all of them remain with the company 12 months later.

PARENTAL LEAVES 2018-2021



All persons with a leave pending completion at the end of 2020 have joined their position in 2021.

STAFF

COMPENSATION POLICY

Based on the principles of Equity, Competitiveness, Motivation and Flexibility.



Aciturri's **Compensation Policy** for **staff we hire indirectly** is defined within the firm's **Role System.** The term "role" is defined as "the set of responsibilities, knowledge, and skills required for optimal performance of the tasks they are in charge of." The same role may require different jobs with different technical content, depending on the area or department.

THIS COMPENSATION POLICY CONSISTS OF

FOUR PRINCIPLES

INTERNAL EQUITY



Direct connection between the assigned responsibilities for each role and the compensation received.

COMPETITIVENESS



It analyzes the relevant market with the aim of attracting and building loyalty from Aciturri's professionals.

MOTIVATION



In addition to monetary compensation for a specific role, employees' contribution to the achievement of results is openly acknowledged and, to the extent permitted by the law, to their own personal and/or family needs.

FLEXIBILITY

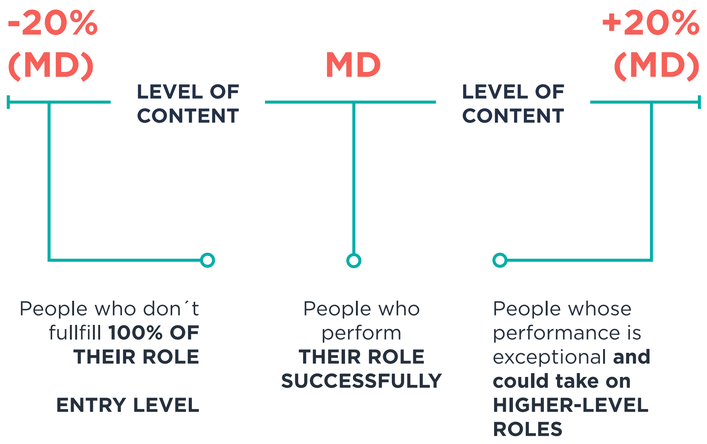


To quickly adapt to the market, the competition, and their own needs. When defining the compensation for each employee, several factors are taken into account: their role, their performance level, their potential, and their personal and family circumstances.

The fixed compensation for each role is defined according to the assessment of roles carried out by CompensaVal—a job rating tool developed by the firm Compensa Capital Humano. It assesses seven factors: required training and experience; complexity of the problems; managerial tasks; leadership and motivation; decision-making; organizational responsibility; and nature of the results.

Assessment determines the combination between internal equity (80%) and market (20%) in order to maintain the internal equity as shown in the analyses carried out and to improve competitiveness within the market.

The graph shows how the overall structure is generated for a specific level of content:



The average for each of the different levels of content is calculated based on the formula for the fixed compensation market Median (MD):

Median (MD)

Y = 90.117 x Points + 3,924.6

Based on this result, there are set limits for each level of content, being -20% the minimum and +20% the maximum. Then, the dispersion is divided by -20% and +20% in 9 different levels so the employees can receive compensation raises without having to change the content of their role according to their experience, performance and potential.

The compensation analysis is conducted based on the 16 roles applicable to our indirect staff which, for the purpose of this analysis, are arranged in 10 groups:

- **FUNCTIONAL SUPPORT: IT COMPRISES LEVELS 1 AND 2 OF FUNCTIONAL SUPPORT ROLES**
- **TECHNICAL SUPPORT**
- **LEVEL-1 ENGINEERING TECHNICIANS**
- **LEVEL-2 ENGINEERING TECHNICIANS**
- **LEVEL-3 ENGINEERING TECHNICIANS**
- **LEVEL-1 CORPORATE TECHNICIANS**
- **LEVEL-2 CORPORATE TECHNICIANS**
- **LEVEL-3 CORPORATE TECHNICIANS**
- **MANAGEMENT: THESE ROLES INCLUDE PRODUCTION MANAGER, FUNCTIONAL MANAGER, BUSINESS SUPERVISOR, AND FUNCTIONAL SUPERVISOR**
- **MANAGERIAL ROLES**

Los datos de retribución fija presentados corresponden a 389 personas con distintas funciones técnicas y diferente ubicación geográfica presentados a continuación corresponden a (las bandas salariales son únicas, con independencia de la ubicación).



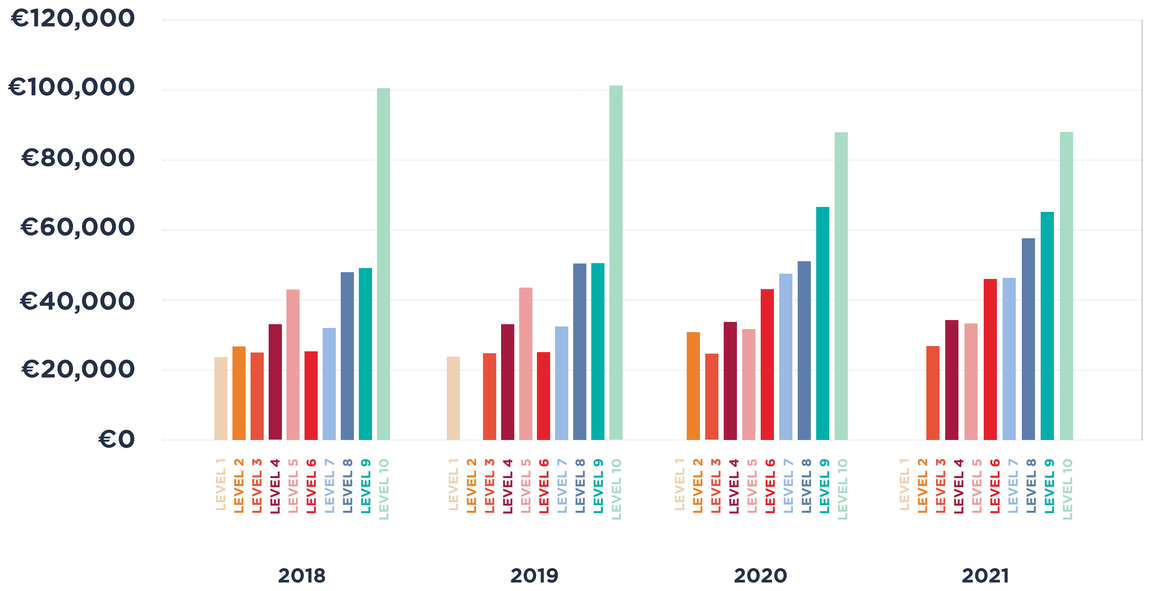
BREAKDOWN

LEVEL	ROLE	MEN ROLE OCCUPANTS	MEN AVERAGE SENIORITY	MEN AVERAGE AGE	MEN AVERAGE FIXED WAGE	WOMEN ROLE OCCUPANTS	WOMEN AVERAGE SENIORITY	WOMEN AVERAGE AGE	WOMEN AVERAGE FIXED WAGE
LEVEL 1	FUNCSUPP 1	-	-	-	-	6	7	41	€21,852
LEVEL 2	FUNCSUPP 2 / TECHSUPP	-	-	-	-	10	12	42	€24,637
LEVEL 3	CORTECH 1 / ENGTECH 1	20	5	33	€26,856	25	12	40	€27,978
LEVEL 4	PLANNER / FACILITATOR	11	12	43	€34,223	6	8	35	€29,069
LEVEL 5	CORTECH 2 / ENGTECH 2	98	9	41	€33,250	49	10	39	€32,015
LEVEL 6	CORTECH 3 / ENGTECH 3	35	15	47	€46,043	13	14	45	€43,401
LEVEL 7	PROMA / FUNCMA / FUNCEXP	40	16	45	€46,385	19	14	43	€50,671
LEVEL 8	BUSMA / FUNCSUP / TECHEXP	29	15	47	€57,691	7	18	46	€62,516
LEVEL 9	BUSSUP / SUPEREXPERT	8	12	45	€65,252	-	-	-	-
LEVEL 10	DIRECTOR	9	17	51	€88,120	4	19	48	€83,848

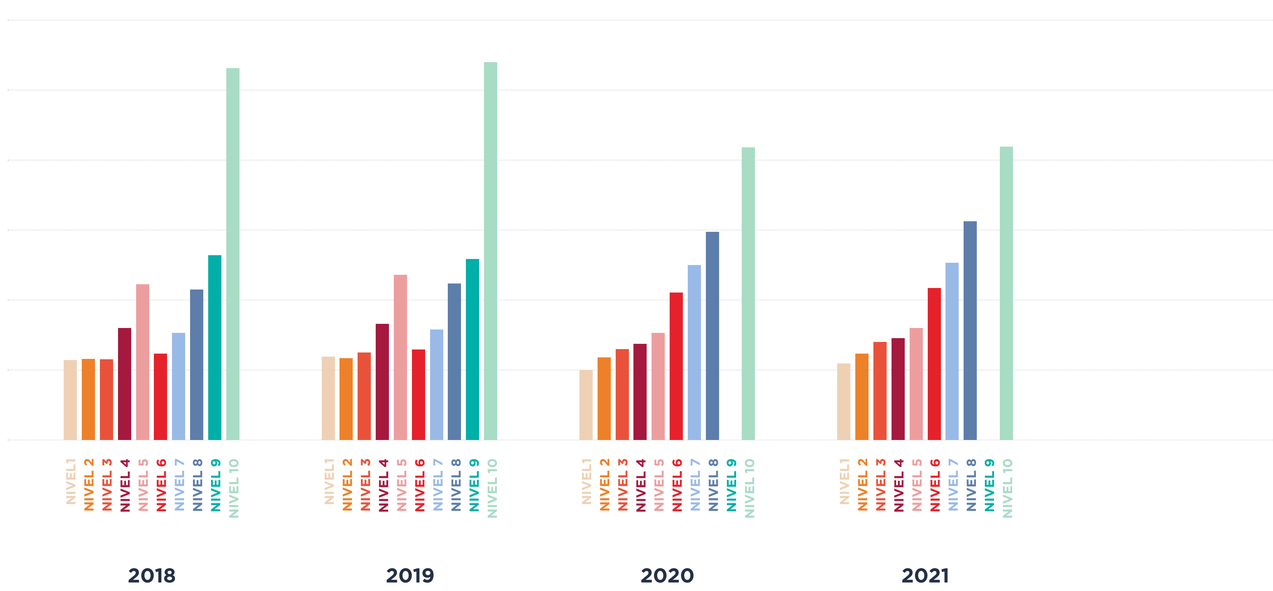
BREAKDOWN LEVEL	ROLE	AVG FIXED WAGE - MEN (EUROS)	AVG FIXED WAGE - WOMEN (EUROS)	GLOBAL AVG WAGE (EUROS)	AVG WAGE – WOMEN VS MEN	WOMEN'S AVG WAGE VS GLOBAL AVG WAGE	MEN'S AVG WAGE VS GLOBAL AVG WAGE
LEVEL 1	FUNCSUPP 1	-	21,852	21,852	0.00 %	0.00 %	0.00 %
LEVEL 2	FUNCSUPP 2 / TECHSUPP	-	24,637	24,637	0.00 %	0.00 %	0.00 %
LEVEL 3	CORTECH 1 / ENGTECH 1	26,856	27,978	27,480	4.01 %	1.78 %	-2.32 %
LEVEL 4	PLANNER / FACILITATOR	34,223	29,069	32,404	-17.73 %	-11.47 %	5.32 %
LEVEL 5	CORTECH 2 / ENGTECH 2	33,250	32,015	32,838	-3.86 %	-2.57%	1.24 %
LEVEL 6	CORTECH 3 / ENGTECH 3	46,043	43,401	45,328	-6.09 %	-4.44 %	1.55 %
LEVEL 7	PROMA / FUNCMA / FUNCEXP	46,385	50,671	47,765	8.46 %	5.73 %	-2.98 %
LEVEL 8	BUSMA / FUNCSUP / TECHEXP	57,691	62,516	58,629	7.72 %	6.22 %	-1.63 %
LEVEL 9	BUSSUP / SUPEREXPERT	65,252	-	65,252	0.00 %	0.00 %	0.00 %
LEVEL 10	DIRECTOR	88,120	83,848	86,806	-5.10 %	-3.53 %	1.49 %

AVERAGE WAGES BY ROLE (MEN) 2018-2021

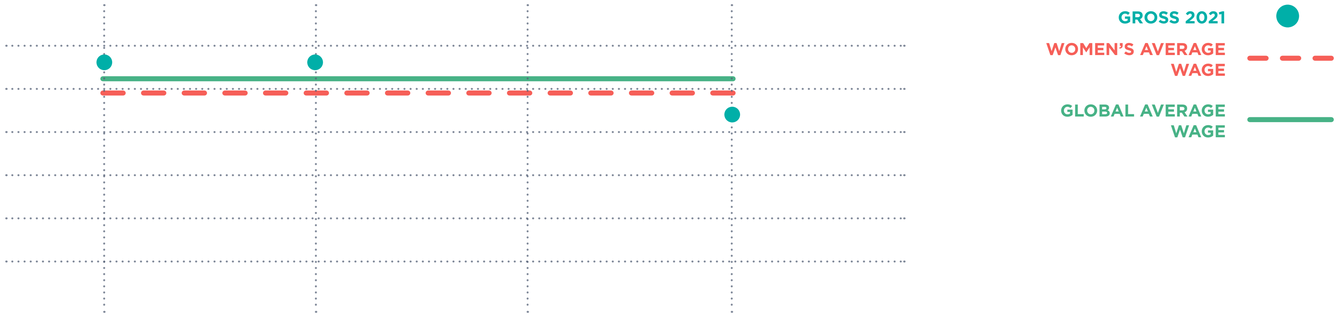
NIVEL1	FUNCSUPP 1
NIVEL 2	FUNCSUPP 2 / TECHSUPP
NIVEL 3	CORTECH 1 / ENGTECH 1
NIVEL 4	PLANNER / FACILITATOR
NIVEL 5	CORTECH 2 / ENGTECH 2
NIVEL 6	CORTECH 3 / ENGTECH 3
NIVEL 7	PROMA / FUNCMA / FUNCEXP
NIVEL 8	BUSMA / FUNCSUP / TECHEXP
NIVEL 9	BUSSUP / SUPEREXPERT
NIVEL 10	DIRECTOR



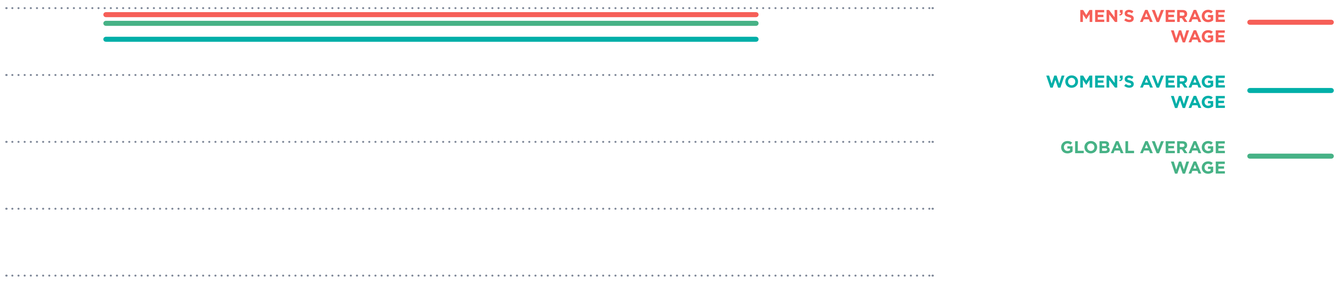
AVERAGE WAGES BY ROLE (WOMEN) 2018-2021



WOMEN IN LEVEL 10 ROLES (MANAGERIAL) VS GLOBAL AVERAGE WAGE FOR LEVEL 10



AVERAGE WAGES FOR LEVEL 10 ROLES (MANAGERIAL) BY SEX AND GLOBAL



In line with Aciturri's Compensation Policy, and after analyzing all individual data within each group, it is safe to state that there are no differences in employees' retribution on the basis of gender, geographic location, or any other discriminatory factor. In fact, the differences in average compensation shown in the previous table are due to the following causes:

- Different levels of seniority.
- Beginning of employment: Aciturri's Role System was implemented in 2012. Since then, employees may change roles based on the increase in the level of responsibilities. When accessing a new role, the entrance compensation level is the one immediately below.
- Role relevance: the same role may be considered more or less relevant depending on the turnover it generates, the responsibility that comes with it, and the number of people that make up the team. This determines the different compensation levels within the same role.

With regard to our **direct employees,** we apply several collective agreements depending on the plant—Collective Agreement for the Chemical Industry, Collective Agreement for the Iron and Steel Industry in Sevilla, Collective Agreement for the Iron and Steel Industry in Valladolid, Collective Agreement for the Iron and Steel Industry in Burgos, Collective Agreement for the Iron and Steel Industry in Álava. In addition to the provisions of the above-mentioned collective agreements, the company has a **Production-based Incentive System** that is equally applied in all of our plants. The only exception is the centers for metal work, where the same variable system as for indirect labor is applied.

Therefore, the compensation of our direct employees is determined by the salary established in the collective agreements, plus incentives and bonuses according to the job or managerial responsibilities.

In the agreements that include professional groups, all jobs are associated with one of them. Hence, the compensation assigned to each group is the one received by anyone with a post within that group, regardless of who they are. In the agreements that include professional categories, these are determined by the evaluation from Skill Matrices and are also independent of the person holding the post.

Therefore, the fixed compensation for similar posts with the same level of experience and seniority is identical, regardless of any other factor (including age or gender). The variable compensation (incentive system) is directly linked to the employee's performance, regardless of any other variables.

With regard to the **Board of Directors,** and following the company's articles of association, trustees do receive compensation. The compensation system and the amount to be received by non-executive board members is a fixed allowance matching their services and responsibilities and determined at the General Meeting for each financial year.

Between January and December of 2021, the gross average earnings in compensation for each of the trustees, all men, were € 45,000 [approx. $47,300]. No in-kind compensations were made last year.

Trustees and Aciturri's board members received no contribution whatsoever in the form of funds or pension plans nor were they promised such benefits. Trustees received no compensation in the form of profit share, life insurance premiums or long-term pension plan systems. Neither were they granted shares or stock, nor outstanding stock options, advances or loans. Finally, they did not receive indemnity either.



STAFF

DIVERSITY

Aciturri respects and promotes the principles of equal opportunities and diversity.



STAFF

DIVERSITY

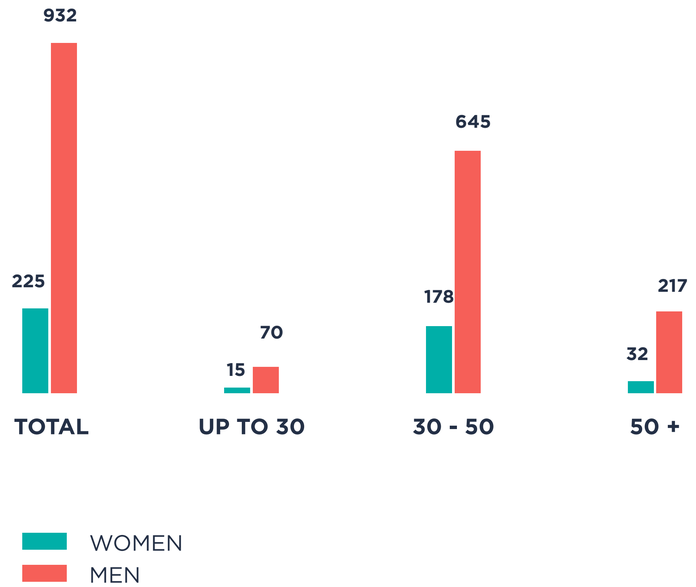
100% of senior executives hired are from the local community.

In our Code of Conduct, respect is a remarkable value. We understand it as the development of interpersonal relationships based on equality and the acknowledgment of the personal and professional dignity of all members of the team, regardless of their status, role, gender, and/or cultural background.

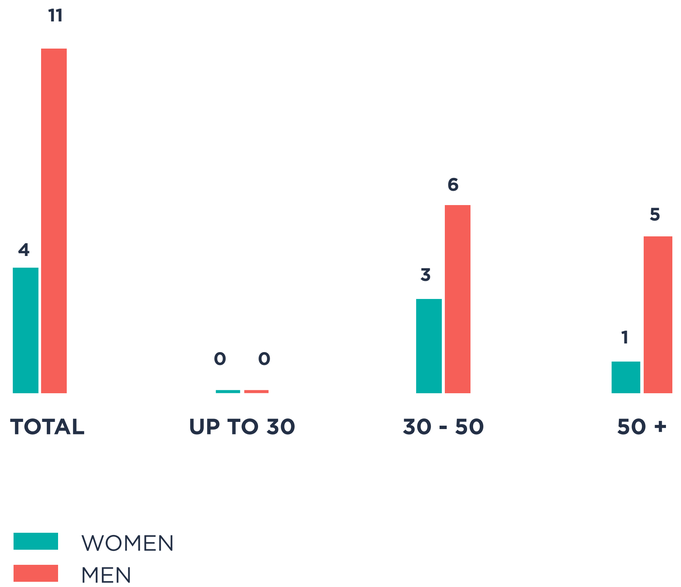
100% of senior executives hired are from the local community [16].

Aciturri hires 1.7% of **people with different abilities** (20 people, of which 18 are men and 2 are women). To comply with the minimum required by law (2%), the company takes alternative measures, which amount to an investment of €541,121.57. (approx. $568,737) (supported employment enclave program at Tres Cantos: with 11 employees; supported employment enclave program at Boecillo: 5 employees; and the purchase of PPE from the Special Center for Employment).

WORKFORCE BREAKDOWN BY AGE ON 12/31/2021



MANAGEMENT [15]



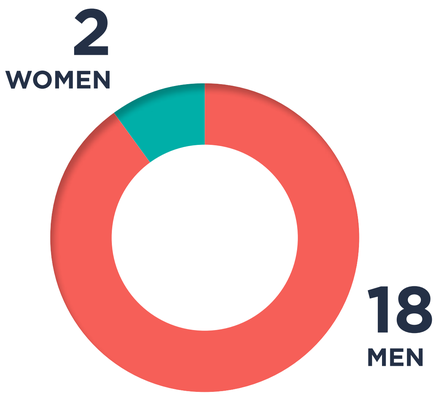
15. The Managing Director is a man between 30 and 50 years old.
16. By “senior executive”, we mean Aciturri’s Managing Director; by “local community”, we mean Spain.

WORKFORCE BREAKDOWN BY NATIONALITY ON 12/31/2021



	Total	225	932
		♀	♂
Brazil		1	0
Colombia		0	1
Ecuador		0	3
El Salvador		1	0
Spain		220	910
France		0	1
Morocco		0	1
Mexico		0	1
Portugal		1	5
Romania		1	7
Uruguay		0	1
Venezuela		1	2

2021 WORKFORCE WITH DIFFERENT ABILITIES



An Enclave Laboral employee has joined the Aciturri workforce.

In 2021, an employee from the supported employment Enclave Laboral program joined Aciturri's team, which achieved the ultimate goal of integration into ordinary companies.

In regard to the accessibility of our facilities, in 2015 we carried out an audit in collaboration with Ilunion, which led to a series of recommendations and actions that had to be prioritized.

As stipulated in our Criminal Compliance Plan (see section "Compliance"), and in line with Aciturri's corporate culture—our set of shared values, beliefs, and customs—it is inherent to the firm to take action against facts, attitudes, and/or behaviors that threaten those values and ethical principles that we deem fundamental rights, regardless of whether or not they are considered a crime.

Aciturri has a **Prevention Protocol and Plan of Action against Harassment and Discrimination** which describes the procedure for reporting and prosecuting any conduct constituting sexual or psychological harassment, and/or discrimination of any kind.

We take pride in the fact that no discrimination cases were reported in 2021.

EQUAL OPPORTUNITIES BETWEEN WOMEN AND MEN

Equal opportunities between women and men is one of Aciturri's areas of work regarding diversity.

In 2021, the company adapted the equality plans of each of the societies to match the new legal requirements. On the one hand, we worked on obtaining the corresponding equality diagnoses, considering all the lines of analysis, quantitative and qualitative data included in Royal Decree 901/2020, of October 13, on the regulation of equality plans and their registration. On the other hand, we made some progress in the development of wage registers and compensation audits, in compliance with Royal Decree 902/2020, of October 13, on equal pay between women and men.

Likewise, the different Special Negotiating Bodies for the equality plans were constituted, again in each of the companies, according to the current regulation.

STAFF

HEALTH & SAFETY

Aciturri is committed to fight any risk related to the safety and health of its staff.



STAFF

HEALTH & SAFETY

94% of the workforce is represented by prevention delegates in the corresponding Health and Safety committees.

Aciturri has an **Occupational Health and Safety Policy** in place, which integrated within our environmental policy, aims to prevent risks that may affect our employees' health and safety, as well as to protect the people associated with our activity or products.

To achieve this, we believe it is key to involve all the workers, especially through their legal representatives. 94% of our staff is represented by prevention delegates from Health & Safety Committees. That figure corresponds to the staff from the following companies and production plants: Assembly, Aerostructures Tres Cantos, Aerostructures Boecillo, Aerostructures Ayuelas, Aerostructures Berantevilla, Aeroengines Orón, Aeroengines Ircio, Getafe, Aeronáutica Tres Cantos, Engineering Tres Cantos, and Aeronáutica Ayuelas (the latter was constituted in 2021).

It is important to note that all the Health & Safety Committees were constituted as Health, Safety, and Environment Committees, which gave workers' representatives the opportunity to take part in environmental objectives, policies, and actions, and not only in preventive ones. This step was taken in the light of the interest shown by prevention delegates to participate in environmental management and improvement.

The remaining locations have not appointed representatives for their workers, so no Health & Safety Committees have been established. However, all employees may communicate with the Department of Occupational Risk Prevention via email or by means of the forms available or the department's ORP technicians at each plant.

All the current agreements regarding health and safety stem from the corresponding collective agreements.

The company uses a system called DELTA for reporting accidents to the labor authorities.

The most significant data on occupational risk prevention are presented below [17,18,19].

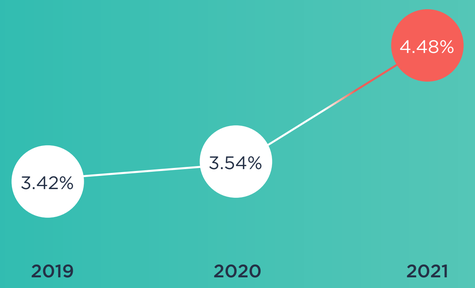


17. The average workforce considered is: 2019—1,580 people (1268 men and 312 women); 2020—1,384 people (1102 men, 283 women); 2021—1,181 people (952 men, 231 women).
18. The number of workers reported in 2020 has been corrected. In 2019, there were 53 accidents that led to medical leave, and 113 which did not. The number reported in the corresponding document had to be corrected, since one of the accidents reported as not leading to medical leave actually led to it. Likewise, in 2020, 48 accidents were initially reported as leading to medical leave, but the actual data reported in this document is 49, determined by certain contingencies.
19. This is based on the number of lost workdays while on medical leave in comparison with the number of accidents that required medical leave as of December 31.

OCCUPATIONAL ACCIDENTS (WITH MEDICAL LEAVE)

		2019	2020	2021
TOTALES	TOTAL	54	49	53
	INCIDENCE (X 100 WORKERS)	3.42%	3.54%	4.48%
	SEVERITY (DAYS)	15.50	19.90	16.70
MEN	TOTAL	47	41	51
	INCIDENCE (X 100 WORKERS)	3.71%	3.72%	5.36%
	SEVERITY (DAYS)	16.66	18.93	15.92
WOMEN	TOTAL	7	8	2
	INCIDENCE (X 100 WORKERS)	2.24%	2.83%	0.87%
	SEVERITY (DAYS)	7.71	24.88	36.5

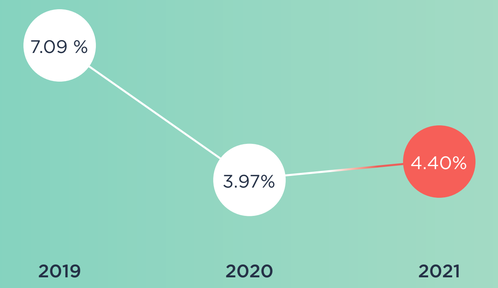
OCCUPATIONAL ACCIDENTS
(WITH MEDICAL LEAVE)
INCIDENCE (X 100 WORKERS)



OCCUPATIONAL ACCIDENTS (WITH NO MEDICAL LEAVE)

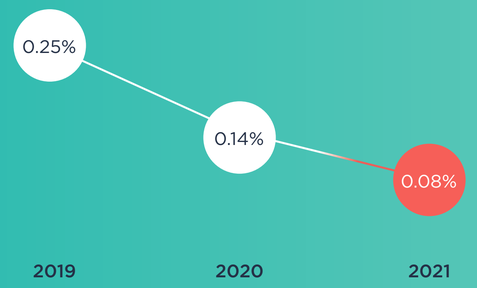
		2019	2020	2021
TOTAL	TOTAL	112	55	52
	INCIDENCE (X 100 WORKERS)	7.09%	3.97%	4.40%
TOTAL	TOTAL	88	50	44
	INCIDENCE (X 100 WORKERS)	6.94%	4.54%	4.62%
TOTAL	TOTAL	24	5	8
	INCIDENCE (X 100 WORKERS)	7.69%	1.77%	3.46%

OCCUPATIONAL ACCIDENTS
(WITH NO MEDICAL LEAVE)
INCIDENCE (X 100 WORKERS)



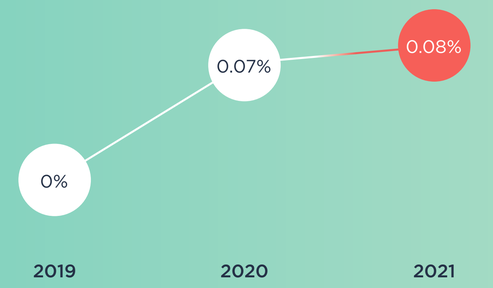
OCCUPATIONAL ILLNESS (WITH MEDICAL LEAVE)		2019	2020	2021
TOTAL	TOTAL	4	2	1
	INCIDENCE (X 100 WORKERS)	0.25%	0.14%	0.08%
TOTAL	TOTAL	3	2	0
	INCIDENCE (X 100 WORKERS)	0.24%	0.18%	0%
TOTAL	TOTAL	1	0	1
	INCIDENCE (X 100 WORKERS)	0.32%	0	0.43%

OCCUPATIONAL ILLNESS (WITH MEDICAL LEAVE) INCIDENCE (X 100 WORKERS)

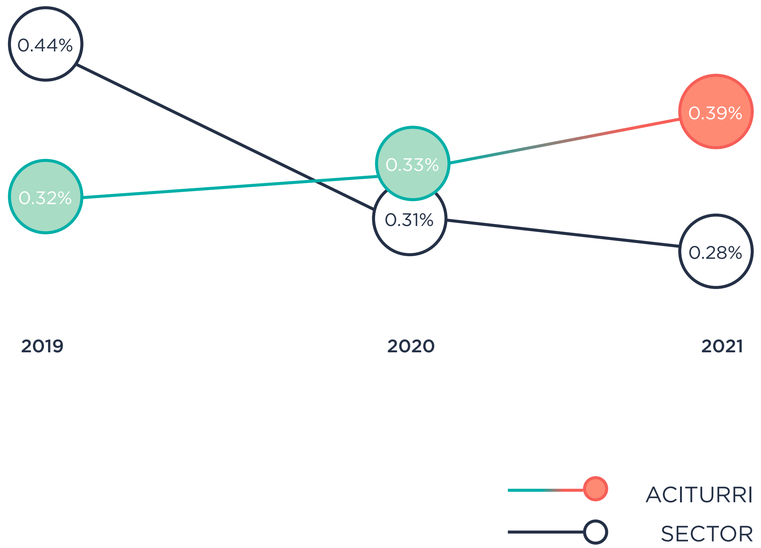


OCCUPATIONAL ILLNESS (WITH NO MEDICAL LEAVE)		2019	2020	2021
TOTAL	TOTAL	0	1	1
	INCIDENCE (X 100 WORKERS)	0%	0.07%	0.08%
TOTAL	TOTAL	0	0	1
	INCIDENCE (X 100 WORKERS)	0%	0%	0.11%
TOTAL	TOTAL	0	1	0
	INCIDENCE (X 100 WORKERS)	0%	0.35%	0%

OCCUPATIONAL ILLNESS (WITH NO MEDICAL LEAVE) INCIDENCE (X 100 WORKERS)



ABSENTEEISM [20]

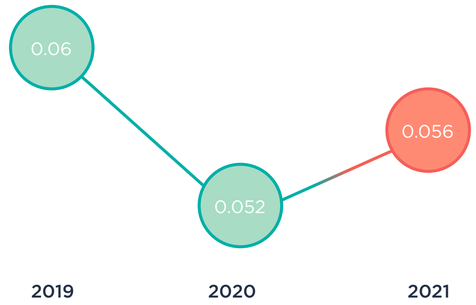


20. Only absenteeism linked to occupational illness and work accidents is reported.

ACCIDENT FREQUENCY RATE (AFR) EVERY 1,000 HOURS [21]

		2019	2020	2021
ACCIDENT RATE	TOTAL	0.060	0.052	0.056
	MEN	0.061	0.056	0.063
	WOMEN	0.057	0.032	0.028
ACCIDENT RATE WITH MEDICAL LEAVE	TOTAL	0.020	0.024	0.029
	MEN	0.021	0.025	0.034
	WOMEN	0.013	0.020	0.006
ACCIDENT RATE WITH NO MEDICAL LEAVE	TOTAL	0.041	0.027	0.028
	MEN	0.040	0.031	0.029
	WOMEN	0.044	0.012	0.023

ACCIDENT FREQUENCY RATE (AFR) EVERY 1,000 HOURS ACCIDENT RATE

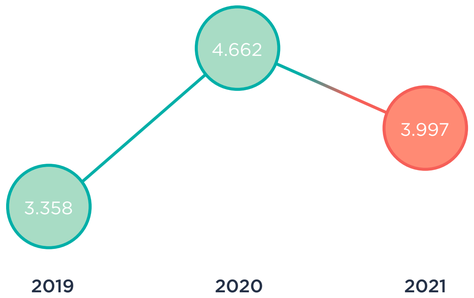


21. Calculated based on workdays lost by occupational accidents and occupational illness, both with medical leave and relapses after an accident, for accidents that happened in this or other years as of January 31.

LOST WORKDAYS RATE EVERY 1,000 DAYS [22]

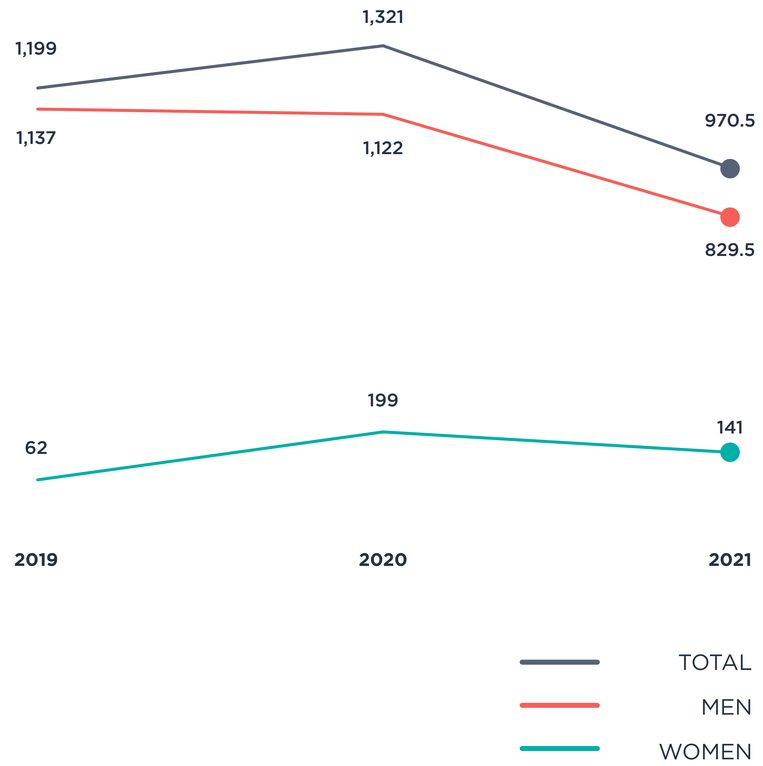
		2019	2020	2021
TOTAL RATE	TOTALES	3.358	4.662	3.997
	HOMBRES	3.945	4.836	4.519
	MUJERES	0.973	3.953	1.753
ACCIDENT RATEWITH MEDICAL LEAVE	TOTALES	3.195	4.553	3.885
	HOMBRES	3.785	4.712	4.403
	MUJERES	0.796	3.904	1.662
ACCIDENT RATE WITH NO MEDICAL LEAVE	TOTALES	0.163	0.109	0.112
	HOMBRES	0.160	0.124	0.117
	MUJERES	0.177	0.049	0.091

LOST WORKDAYS RATE EVERY 1,000 DAYS TOTAL RATE



22. This figure reflects the lost hours due to events that occurred in 2021 and does not include those lost due to events that occurred in previous years and that were not closed as of December 31, 2020.

DAYS LOST DUE TO OCCUPATIONAL ACCIDENTS AND ILLNESS WITH MEDICAL LEAVE [23]



23. Calculated based on workdays lost by occupational accidents and illness, both with medical leave and relapses after an accident. Accidents that occurred in this or other years as of January 31.

The organization has an Occupational Risk Prevention Management System, certified under the ISO 45001 standard and covering all companies and plants, whose objective is to reduce the accident rate by extending a culture of prevention in the face of the risks associated with each job.

All the companies that make up Aciturri, with the exception of those located in the plant at Tres Cantos, are subject to the provisions of the II State Agreement for the Metal Industry. This implies compulsory training of workers according to their jobs, and beyond the legal training requirement established in article 19 of the Law on the Prevention of Occupational Risks, which establishes a minimum of 20 hours of training in the risks inherent to their activity.

In 2021, Aciturri's Prevention Service maintained its accreditation as a training entity with the Metal Labor Foundation. Thanks to this accreditation, in 2021 85% of the workforce was trained in their job under the requirements of the Foundation. This is very relevant, considering the high job turnover experienced last year.

Through the risk assessments carried out, the Prevention Service identified three risks in terms of occupational disease: two hygienic and one ergonomic.

The main hygienic risks are linked to the use of carcinogenic compounds of strontium chromate and to noise exposure. As a way of preventing them, exhaustive technical and work controls are carried out and work conditions are monitored; we have a zero-tolerance policy on deviations.

As for the ergonomic risk, it is derived from musculoskeletal disorders, postural risk, and repetitive strain injuries (RSI). In order to minimize this, in 2021 the project "Zero Injuries", already implemented at the plants in Madrid (Getafe and Tres Cantos), and Valladolid (Boecillo), was extended it to the centers of Sevilla.

Although the accidents due to MSDs (musculoskeletal disorders) increased compared to previous years, the number of lost days was reduced due to the shorter duration of the associated medical leaves. Since the start of the "Zero Injuries" project, ergonomic means have been increased and workplace designs improved in order to reduce damage and limit their extent. We are also trying to diagnose the MSD injury as soon at it appears, so that we can take the necessary actions to repair it before it gets worse.

In 2021, Aciturri kept up its effort to protect workers against the transmission of COVID-19 in the workplace through the strategies and protocols adopted by the Joint Prevention Service and the supervision and monitoring by the senior management.

The "Zero Injuries" project has increased ergonomic resources and improved workplaces design.

Accident rates derived from MSDs	2019 [24]	2020	2021
ACCIDENTS WITH MEDICAL LEAVE	29	22	32
ACCIDENTS WITH NO MEDICAL LEAVE	50	16	15
LOST WORK HOURS DUE TO RSI-DERIVED MEDICAL LEAVE [25]	3.963	4.248	3.836
LOST WORK HOURS (WOMEN)	420	8	880
LOST WORK HOURS (MEN)	3.516	4.240	2.956

24. Following the NSST's (the Spanish National Institute of Health and Safety at Work) resolution determined by certain contingencies, the data corresponding to 2019 has been recalculated in relation to that published in previous sustainability reports, since it included two accidents that were not accounted for, in addition to an accident that went from not leading to medical leave to actually leading to it.

25. This figure reflects the lost hours due to events that occurred in 2021 and does not include those lost due to events that occurred in previous years and that were not closed as of December 31, 2020.

These protocols were designed and enforced with the agreement of the entire team to achieve the least possible exposure to the virus, to ensure the safety of our employees, and the continuity of our activities. In addition, they are constantly reviewed to make sure we are following the recommendations given by the health authorities and taking into account the different levels of severity we went through.

THESE PROTOCOLS ARE BASED ON:

- Ensure a safety distance of 1.5 meters (5 feet) in all fixed work stations and common areas
- Constant disinfection of common areas and work stations, with specific time allocation for this task
- Use of accredited masks as a measure of personal protection during the working day, regardless of social distancing
- Maintain the capacity limitations based on social distancing rules and rooms and offices ventilating capacity
- Visitor and contractor controls, including prohibition or limitations, according to the epidemiological evolution
- Prevalence of remote work or continuous workday for the best part of the year, always based on the epidemiological situation
- Checks to ensure the measures were being complied with

These measures and all updates were shared constantly through the usual channels of internal communication, in addition to specific signs and notices. For the application or relaxation of COVID-19 measures, we worked with the prevention representatives in the companies with constituted Health, Safety, and Environment Committees.



STAFF

INTERNAL COMMUNICATIONS

More than a thousand news were shared on the corporate social network in 2021.



STAFF

INTERNAL COMMUNICATIONS

The areas share their knowledge and experience through the “Internal Knowledge Sharing Sessions” program.

Aciturri’s corporate social network, **JAM,** is the main internal communication channel. Thanks to it, every employee can communicate in real time with everyone else within the company via the web platform and the mobile app. In 2021 alone, it was used to share over 1,000 pieces of information.

The restrictions due to the pandemic made it impossible to carry out some company-based initiatives such as **Family Day** (an event for all employees, their partners, and children to gather which Aciturri has been celebrating biennially since 2008), or the **annual meetings held at the end of each financial year** where employees in each center meet to discuss the current year’s results and present the objectives for the next one. In view of this situation, new channels of communication were enabled, for example, the company’s operations evaluation that the General Manager shares quarterly with the whole team via JAM, meetings of the Managing Director with directors and direct collaborators in each management team, and on-site meetings between facilitators and operations coordinators and the General Management. Also, we implemented a monthly communication space during panel meetings at each plant in which the production teams take part.

In 2021 the company activated the **Internal Knowledge Sharing Sessions** program with the purpose of sharing and spreading internally the experience and knowledge of the different divisions within the organization. Normally, the Communications team organizes video calls through the internal social network twice a month. The dynamic is as follows: two or three people who collaborate in the same project or area share their knowledge and experience around specific issues (e.g. cybersecurity, design change management, business diversification, new technological developments...) for approximately 35 minutes, and then there is a Q&A session with the attendees. The presentations used in these sessions are then shared on Aciturri’s training platform.

On this first year, 34 professionals participated as speakers in a total of 15 sessions, attended by 82 people on average.



STAFF

OTHER INITIATIVES

213 children submitted their drawing to illustrate the Christmas card.

Aciturri fosters a work environment that favors a balanced personal life and promotes initiatives other than the ones specifically related to the job and the professional performance.

DRAWING CONTEST FOR CHILDREN

In 2021, Aciturri held the **annual drawing contest** for employees' children up to the age of 12. The winning drawings are used to illustrate the Christmas cards Aciturri sends to employees, clients, suppliers, and different institutions.

Since 2019, the invitation has been extended to the kids at the San Agustín de las Hijas de la Caridad en Vera children's home, in Almería, a center Aciturri collaborates with through different channels. A total of 213 children took part in the 2021 edition. All of them were thanked for their drawing with a gift.



R&D&I

Aciturri's R&D&I goals are designing and developing new products, processes, and manufacturing technologies.



R&D&I

R&D&I INITIATIVES



R&D&I

R&D&I INITIATIVES

Aciturri's R&D&I goals are designing and developing new products, processes, and manufacturing technologies. We understand this is the only way to attain a sustainable long-term success.

We take up an active role in industrial innovation and work both on our own and in collaboration with suppliers, clients, technological centers, universities, and other research bodies on research and technology alignment programs. The ultimate goal is to improve the industry and increase our own competitiveness.

PROJECTS STARTED IN 2021

NEOTAIL

In June 2021, the CDTI (in English, the Center for Industrial Technological Development) approved the NEOTAIL project (New Optimized Empennage with Advanced Technologies for Laminar Flow Integration) within the CIEN Strategic Program for National Enterprise Research.

This project is led by Airbus and fits within the aircraft of the future scope, specifically the empennage. Aciturri takes part together with four other companies specialized in different aeronautical components and processes. The project will be implemented between 2021 and 2024.

Aciturri invested €3.06M and will focus its research on developing a thermoplastic-based tail rudder solution. The scope of the research includes the design of the component based on these materials and the development of the processes required to turn this solution into a complete efficiency and sustainability proposal, both from the industrial and product standpoints.

COMP COAT

Enhancing composite capabilities through the use of coatings is a great opportunity for increasing the performance and durability of existing components, as well as for creating new solutions. Aciturri collaborates with CTME, CIDAUT, MPB, and IMATEC in a regional R&D&I project organized by Castilla y Leon: "Research of new coatings on composites and technical plastics with specific functionalities for the transport and biomedical sector (COMP COAT)". The goal is to promote the collaboration between technological centers and companies.

The project is scheduled to be completed in December 2022. Aciturri's investment amounts to €0.3M and will focus on the research of coatings that increase the thermal resistance and on weathering and erosion of composite materials. It will also cover aspects such as electrical conductivity and radiation emission/absorption.

AERCOST

In 2021, CDTI's Aeronautical Technology Program (PTA in Spanish) was re-launched with Aciturri at the helm of the project "Aeronautical Components and Systems of the Future" (AERCOST). It aims to obtain disruptive solutions in aerostructure components in order to facilitate their integration with new zero emission propulsion systems. This will focus on the use of new materials and manufacturing technologies that allow lightweight designs with greater fire and impact resistance.

This project, in which Aciturri plans to invest €2.7M, started in 2021 and will run through 2023, in collaboration with Airbus Operations, IDEC, MTorres, and Tromosa.

MULTIGLIDE

Also within CDTI's Aeronautical Technology Program, Aciturri leads the project "Development of new glide forming process for integration of high camber components and parts" (MULTIGLIDE), which will run until 2024 together with LGAI Technological Center and SYNERGIA Racing Group.

MULTIGLIDE aims to investigate processes that allow the manufacture of large structures integrated in composite material for the new generation of zero emissions aircraft with high production rates. Research will be done specifically on glide forming technology applied to advanced torsion wing box structures and complex geometry components such as rib frames, curved spars, and leading edges.

Aciturri's investment in this project amounts to €2.07M.

PROJECTS STARTED IN 2021

FCAS 1A PHASE

The FCAS or Future Combat Air System is a European combat system under development by Airbus, Thales Group, Indra Sistemas, and Dassault Aviación.

In December 2020, the Direction Générale de l'Armament (DGA), on behalf of the Spanish, German, and French governments, formalized the contractual amendment allowing the Spanish industry to fully integrate into the activities of Phase 1A of Technology Demonstrators of the NGWS/FCAS project.

As a result of Spain's joining Phase 1A of the program, in 2021, Aciturri developed the activities within their scope of participation in the NGF and Engine pillars.

FUEL STORAGE TANKS

Following on from the activity already started in 2020 for product diversification in the company, Aciturri finished defining the roadmap for the development of composite solutions for fuel storage and launched three initiatives in 2021:

- Development of type 4 tanks for high pressure hydrogen storage for heavy land transport applications.
- Development of type 5 tanks for cryogenic hydrogen storage for aeronautical applications.
- Development of type 5 tanks for cryogenic fuel storage for space applications.

DOMMINIO

2021 marked the start of this project led by the AIMEN technology center and 100% subsidized by the Horizon 2020 program. Aciturri plays the role of an end user in order to align the technological developments carried out in the project with applications of interest to the industry.

In 2021, Aciturri helped complete a requirements specification and conceptual design of a component demonstrator on which certain technologies can mature, for example,- thermoplastic manufacturing with on-site consolidation, SHM (structural health monitoring) systems for condition monitoring or on-line contactless inspection of stacked material.

Another important aspect developed within DOMMINIO is the progress in the multidisciplinary optimization of aeronautical components during their development phase, supported by digital tools that bring together information from all the disciplines involved: design and calculation, manufacturing processes, production, assembly, in-service maintenance, quality, etc.

ONGOING PROJECTS THAT CONTINUED IN 2021

IMPACT

Aciturri Additive Manufacturing (AAM) is part of a group of organizations led by the Idonial Foundation that develop the IMPACT Project, granted by the Spanish Government's Ministry of Defense. The project aims at "3D printing new materials and auxetic structures to improve the combatant's passive protection systems", and it is part of the call for R&D projects of interest for the Ministry of Defense that are likely to be included in the scope of the Program for Cooperation in Scientific Research and Development in Strategic Technologies (Programa Coincidente).

Auxetic structures and materials are those with a negative Poisson's ratio, which makes their behavior contrary to the usual when subjected to expansion or contraction. This property is ideal for protection systems and, at the same time, it opens up a wide range of opportunities for application in other sectors by combining lightness and strength in structures that had to be solid until now. In 2021, different structures were studied and tested to select the best behavior and a material with the desired properties was characterized.

DAAMAS

During 2021, the second year of this European project within the MANUNET network focused on the research of the industrial implementation of WAAM technology, Aciturri Aeroengines made new progress with its project partners in the two lines of work: development of WAAM solutions based on TIG and MIG/MAG welding technologies and their application to Ti and Al alloys, and Ni superalloys.

The activities carried out in this period resulted in the development of representative test pieces and demonstrators of the problematic parts in installations adapted for industrial use, and tests for the characterization of the materials necessary to analyze the technical feasibility of the processes developed.

FEINA

In 2021, the creation of test specimen by wire deposition of titanium on titanium base plates continued. Narrow wall and wide wall test pieces were built and tested in search for the optimal process for this technology to generate parts with similar properties to those that would be obtained by hand or die forging processes.

Some of the alternatives being analyzed are: using or not using roller press forming after the deposition of the chord, application and search of suitable parameters for thermal treatment, and analysis of the need for HIP (Hot Isostatic Pressing) for porosity removal and grain homogenization. The testing campaign will end in early 2022 and will allow further progress to be made in defining the best possible process.

From an industrial point of view, the cooling systems of the deposition head were improved and the good behavior of the controlled atmosphere storage room was verified; the latter prevents the formation of titanium oxide in the internal structure, which would affect the mechanical properties.

COPERNICO

In 2021, we completed the development activities on the fitting demonstrator, which will serve as the basis for completing the project with the final fittings. Main activities completed:

- Unfolding a set of tests to verify that the new concepts of number of plies in the radius behave according to calculation models
- Adjustments in the forming and roving placement processes
- Development of a preform laser cutting process that guarantees maximum precision at the edge of the part, enabling a good closing of the tool and achieving that, once injected, the part does not require the subsequent CNC cutting process

Finally, several injections using RTM were performed, which made it possible to analyze the dimensional quality of the part, as well as the internal quality, by means of ultrasound inspection and macrographies. All of the above shows a significant level of success, so we passed a CDR (Critical Design Review) that opens the door to new steps in 2022 with improved laser processes. RTM injections on multi-cavity tools, and full-scale destructive test of the entire fitting.

ONGOING PROJECTS THAT CONTINUED IN 2021

EWIRA

In 2021, this project focused on completing the mid-plane and bench demonstrator, and completing the design and assembly process of the external wing demonstrator.

The first demonstrator was completed digitally at the end of the year, validating the application of the jigless assembly philosophy on different types of large components—both structural wing boxes and tubular structures. These assembly technologies reduce the cost of assembly zones and tooling by maintaining or improving the tolerances of the current state-of-the-art options. In 2021, it was also possible to verify that this methodology allows to absorb deviations from previously assembled parts with greater ease and reduces the need for post-processes in these previous assemblies.

With regard to the external wing demonstrator, Aciturri successfully covered the demonstrator CDR in the fall and began releasing the detail parts manufacturing documentation before the end of the year. This demonstrator will validate flexible assembly zone concepts (for different components) and other technologies implemented in it by other Clean Sky 2 participants such as Airbus Defense & Space, and FIDAMC.

PROJECTS COMPLETED IN 2021

CIMA

The first stage of the CIMA project was completed in the first few weeks of 2021, by conducting a functional test.

This project researches the inclusion of deformable elements in aeronautical structures which allow to provide an aerodynamic continuity between control surfaces (e.g. ailerons or rudders) and fixed surfaces (e.g. wings or stabilizers). By removing these gaps, which are now mitigated by installing aerodynamic seals, the effectiveness of the control surfaces would increase and eventually its size and required deflection efforts would be reduced. The test carried out on Aciturri's proposed solution served to validate a TRL3 maturity level for this technology, laying a very solid foundation for further developments.



R&D&I

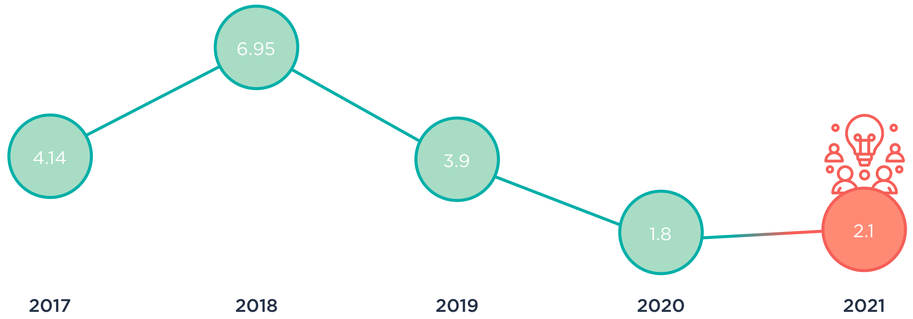
INVESTMENT IN R&D&I



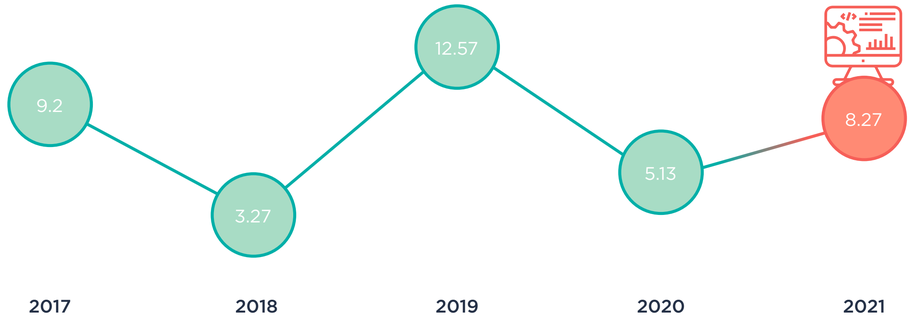
R&D&I

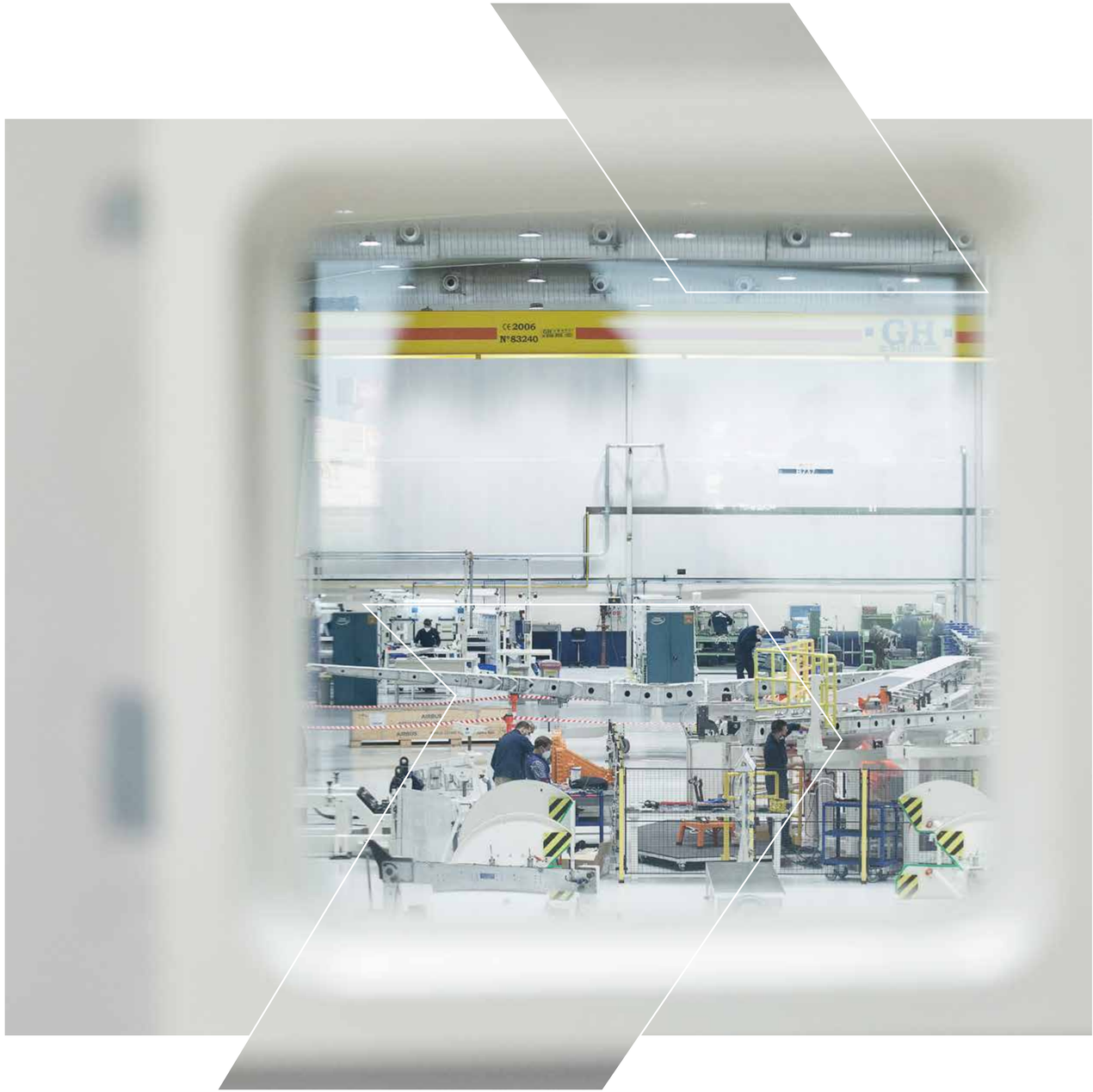
INVESTMENT IN R&D&I

RESEARCH (€M)



DEVELOPMENT OF NEW PRODUCTS (€M)





ENVIRONMENTAL MANAGEMENT



ENVIRONMENTAL MANAGEMENT

Environmental management system certified according to ISO 14001:2015.

The sustainable use of natural resources, thanks to efficient and controlled production processes, is important to minimize Aciturri's environmental impact. It is a matter of commitment to the environment, but also a strategic issue for the company and the aeronautical sector as a whole.

Aciturri has an environmental management system in place designed and certified based on the ISO 14001: 14001: 2015 standard. It allows a systematic management of environmental issues, ensuring we comply with all legal requirements of application and with our commitment to minimizing the impact.

Through our Environmental Policy, we are committed to complying with the applicable environmental legislation, but also to collaborating with the authorities to enact measures to minimize the impact of adverse situations that may affect the environment.

We conduct an annual assessment of environmental impacts and risks and, provided the impact or risk is considered unacceptable, mitigation plans are designed and implemented.

Below are the results of this environmental impact assessment for 2021 at each facility:



	CONSUMPTION	WASTE	DISCHARGE	EMISSIONS
AYUELAS	Electricity Turco Liquid Smut Go NC Tartaric acid Ardrox 9813 Universal solvent	Cutting fluids Flakes from the painting booth Waste (comparable to urban)	Chlorides Fluorides Iron	--
BERANTEVILLA	Electricity Diesel oil Acetone	Cutting fluids Sludge from machining activities	Molybdenum	--
LOGÍSTICA	--	--	--	--
BOECILLO	Drinking water Electricity Gas Isopropyl alcohol Solvent Diestone Thinners Paint	Pre-peg residues	Nitrogen	Noise Diffuse VOC emissions
TRES CANTOS	MEK Acetone Safran Solvent for cleaning paint spray guns	Water with paints and inks	Phosphorus (total)	Diffuse VOC emissions
ALCALÁ DE GUADAIRA	Isopropyl alcohol MEK Diestone Painting Thinners	Painting booth filters	--	--
ADDITIVE	Electricity	--	--	--
ORÓN	Electricity Diesel oil	Sludge Cutting fluids Urban solid waste	Iron	--
IRCIO	Ardrox 9-PR-5 solvent Solvents (Z24531-AMS2644C2/1)	Sandblasting sand	--	--
GETAFE	Diestone	--	--	Diffuse VOC emissions
AERÓPOLIS	Electricity Propane gas MEK Diestone wipes	Painting booth filters Urban solid waste	--	--

The most serious environmental risks were spills in the plants of Berantevilla, Ircio, and Orón, and the risk of non-compliance with the discharge limits in the plant of Ayuelas. Specific measures have been approved for managing these risks.

Our activities have no impact on biodiversity or any protected areas, therefore we have not adopted measures aiming at preserving or restoring them.

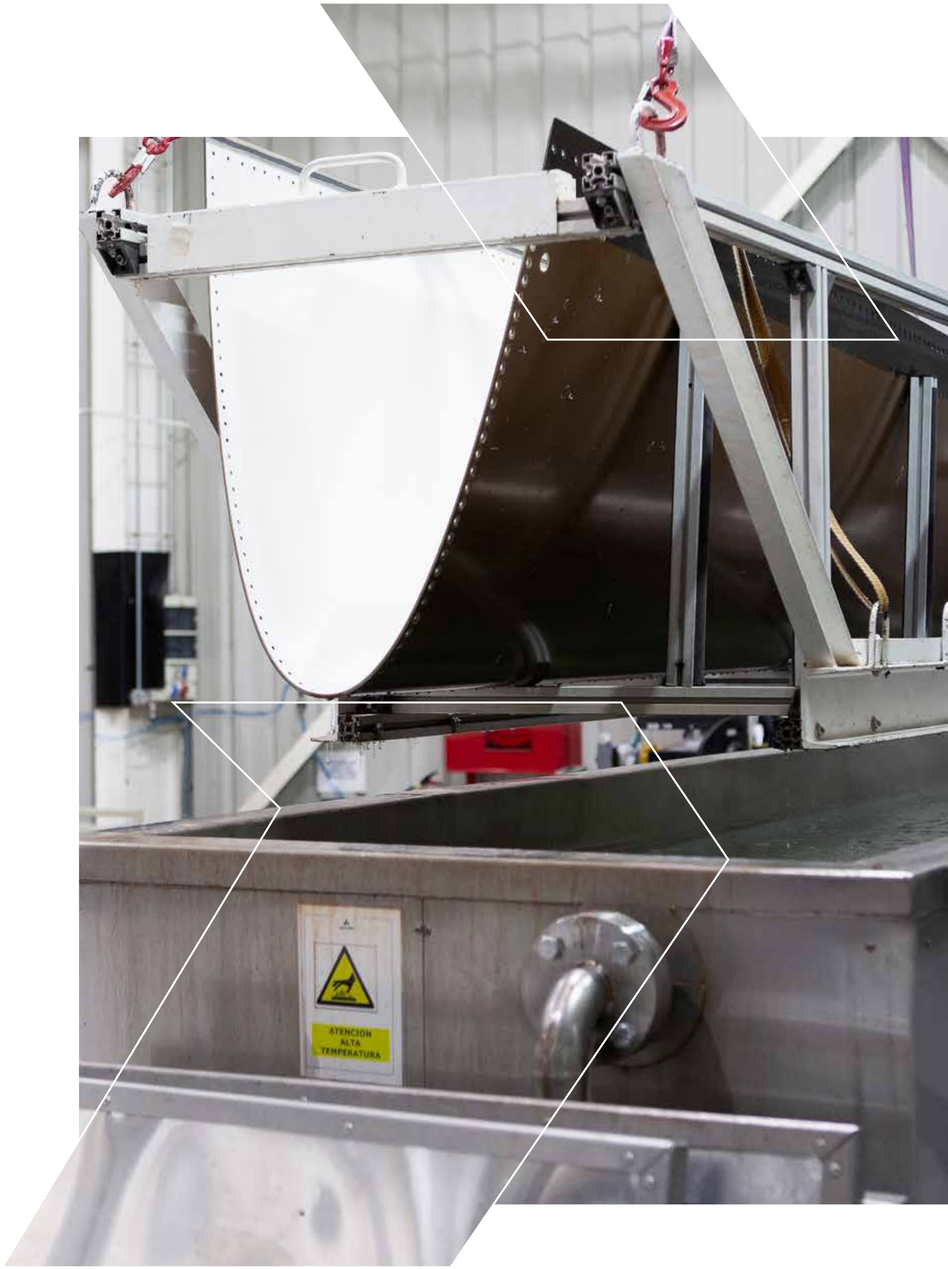
Aciturri's Environment Management Department has the necessary resources to effectively tackle environmental issues. Each of the plants in Castilla y León, Álava, and Madrid has a coordinator and an appointed environmental technician. In Sevilla, there is a technician who devotes 25% of their workday to environmental and KPI (key performance indicator) management. Also, every plant has a contingency plan and all the resources necessary for spill containments or any other potential environmental accidents.

Aciturri's activity is within the scope of Law 26/2007 on Environmental Responsibility. According to Order TEC/1023/2019, of October 10, the Ayuelas plant is within priority group 3. Therefore, we carried out a risk assessment to determine the Environmental Damage Index (IDM in Spanish), using the methodology of the reference regulations and the tools put in place by the Ministry for Ecological Transition and the Demographic Challenge.

This Environmental Damage Index allows to calculate the value of the financial guarantee, €646,122 for the baseline scenario (incident related to the storage of chemical products). Therefore, taking into account the exclusions defined in article 28 of Law 26/2007 on Environmental Responsibility, we didn't need to establish a financial guarantee, given an ISO 14001-certified Environmental Management System is available.

There were no fines or sanctions due to non-compliance with environmental laws and regulations in 2021.

Our activities have no impact on biodiversity or any protected areas.



ENVIRONMENTAL MANAGEMENT

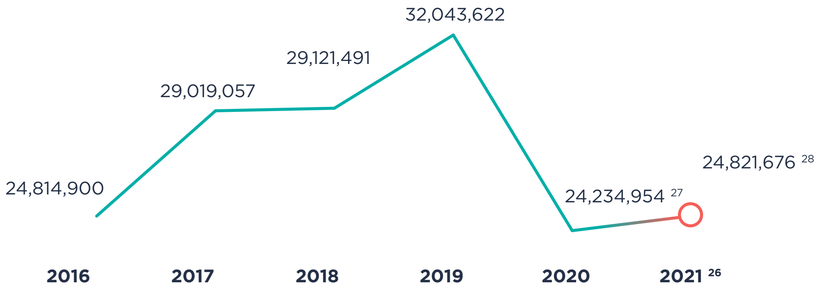
ENERGY CONSUMPTION

Minimize environmental impact and contribute to economic sustainability.

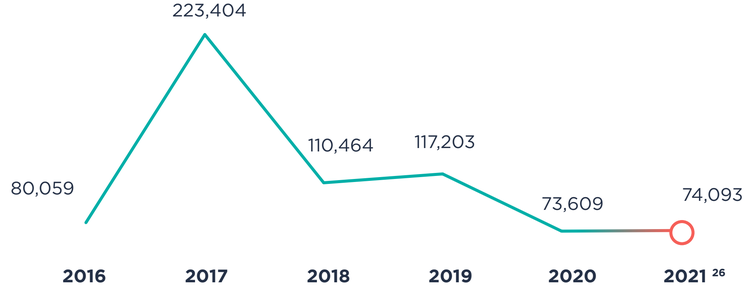


A way of minimizing environmental impact is seeking efficiency in the consumption of energy resources, which also has a positive impact on the company's economic sustainability.

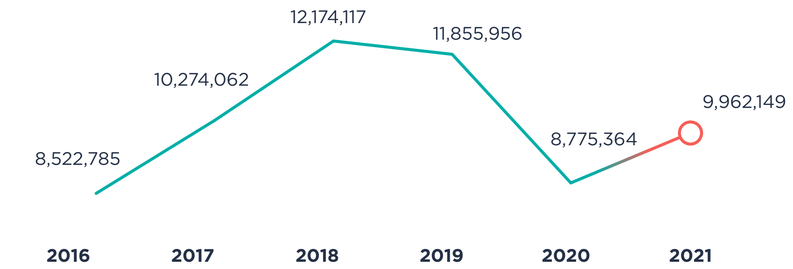
ELECTRICITY (KWH)



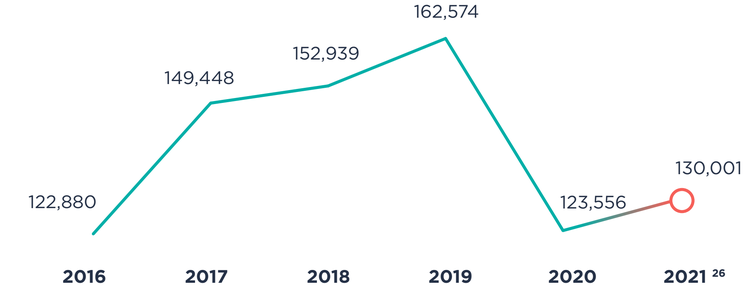
DIESEL OIL (L)



GAS (KWH)

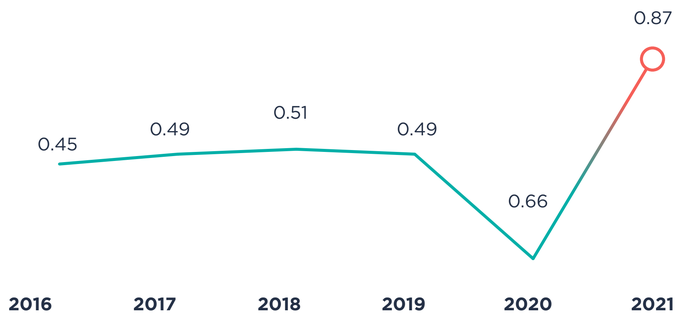


TOTAL (GJ)[29]



26. The share of renewable energy from Endesa, the electricity supplier, is 23.9%, according to the CNMV report published on April 15, 2021 (this is the latest report at the time this document was finished). The rest of energy resources used are non-renewable.
27. The data included in the 2020 report included an estimate of the consumption because we were still waiting for some bills at the time this document was finished. The figure specified in this document corresponds to the actual number.
28. This is an estimate because we were still waiting for some bills at the time this document was finished.
29. The used conversion factors are as follows: 1 kWh = 0.0036 GJ; diesel oil density = 832 kg/m3; diesel oil NCV = 43 GJ/t.

ENERGY INTENSITY RATIO (GJ/€K) [30]



In 2021, energy audits were carried out at the plants with the most significant consumption (see section “Technical Services”). In addition, we removed the outdoor leaking test bath at Tres Cantos to reduce energy consumption. For the same reason, LED luminaires and presence detectors were installed at Aerópolis.



30. The ratio has been calculated based on the total energy consumed within the company against the turnover.

ENVIRONMENTAL MANAGEMENT

USE OF RESOURCES AND MATERIALS



RAW MATERIALS [31]	2016	2017	2018	2019	2020	2021
Steel [32] (m)	27,295	32,760	39,333	42,925	10,130	34,410
Aluminum [33] (m2)	19,123	15,115	8,900	8,910	5,497	1,218
Titanium [34] (m^2)	2,006	19,465	32,189	33,301	12,221	11,725
Prepreg (m^2)	1,296,467	1,543,881	1,469,843	1,663,340	899,435	648,356
Inconel [35] (m)	1,978	1,305	1,473	1,374	756	910
Cutting oil (L)	4,366	7,552	10,836	10,820	5,951	7,515
Cutting fluids (kg)	16,150	16,998	29,518	32,600	14,710	18,233

Optimizing the use of raw materials allows to improve the efficiency of the processes and minimize their environmental impact. It's important to use the strictly necessary quantities of each resource, especially for environmental-sensitive materials such as paints or solvents.

The most outstanding initiatives launched in 2021 to increase efficiency in resource and material consumption were:

- Implementation of **RETURNABLE PACKAGE AND CONTAINER SYSTEMS,** both for transportation between plants and for clients.
- **REUSE OF PACKAGES AND CONTAINERS IN PRODUCTION PLANTS,** establishing a closed cycle of return of standard manufacturing order bags, parts caps, etc.

31. Likewise, we do not have data regarding the percentage of renewable and non-renewable materials.
32. Rods with a diameter between 25.4 and 220 mm. Casts and forgings are excluded.
33. Sheets with a thickness between 30 and 220 mm. Forgings, profiles, and tubes are excluded.
34. Sheets with a thickness between 20 and 101.6 mm.
35. Rods with a diameter between 12.7 and 150 mm. Casts and forgings are excluded.

CONTAINERS AND PACKAGING [36]	2016	2017	2018	2019	2020	2021
Plastic containers (plastic used for packaging) (kg)	269,611	153,502	298,427	215,684	30,623	45,725
Cardboard containers (corrugated cardboard and cardboard packaging) (kg)	19,094	20,437	65,913	76,849	35,975	18,224
Wood packaging and composite containers[37] (wood packaging, pallets and similar platforms for goods handling) (kg)	84,113	62,395	118,529	80,293	64,054	119,577

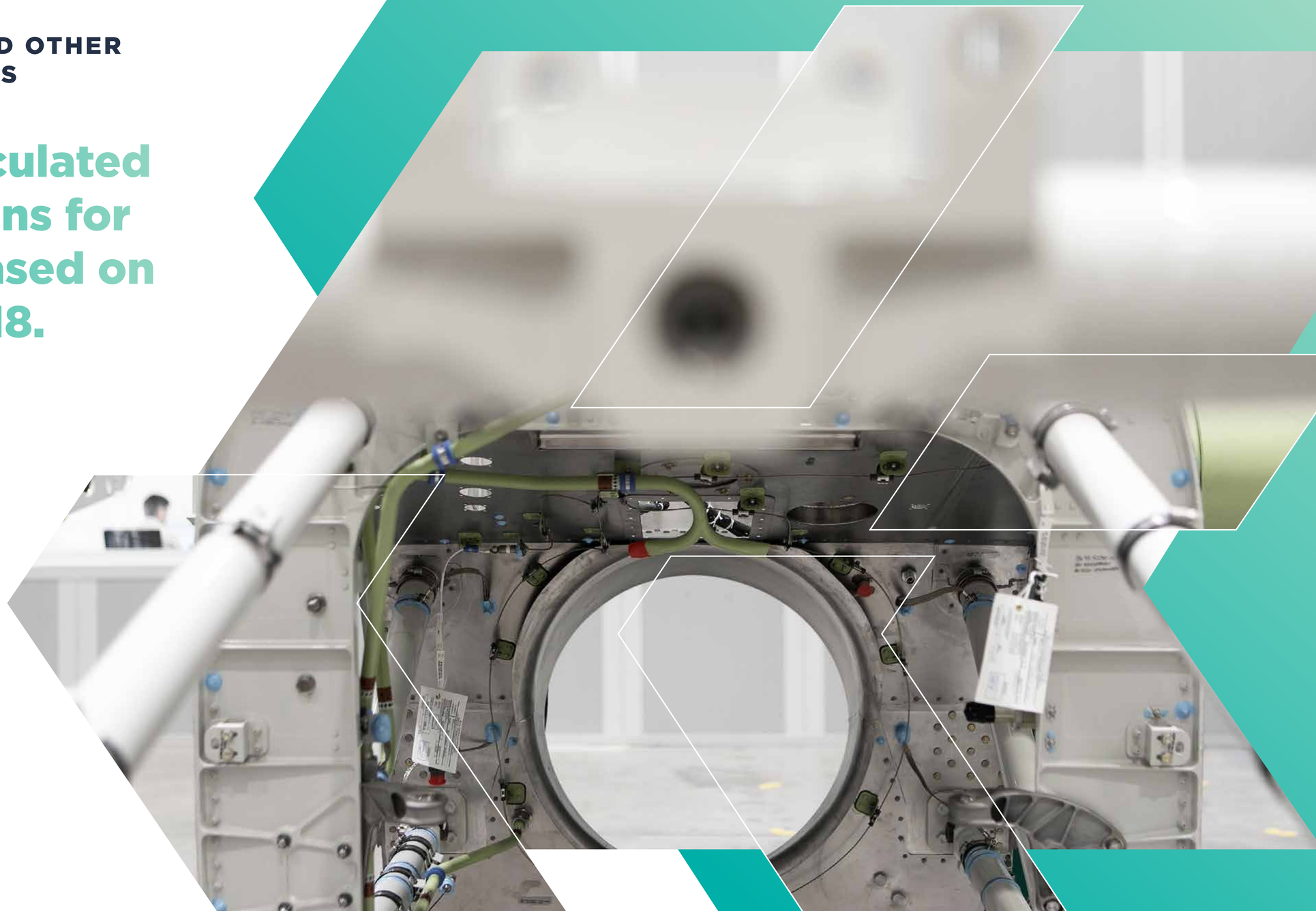
Containers and packaging: returnable in transport and reusable in production.

36. Material recycling is performed in all cases.
37. Although up to 2018, the quantity of composite containers and wood packaging was reported independently, in 2019 we decided to unify them because, in many plants, it is impossible to separate this type of packaging.

ENVIRONMENTAL MANAGEMENT

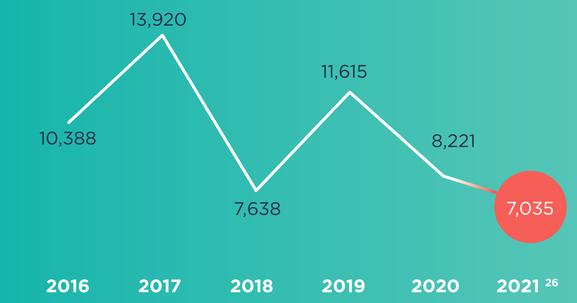
CARBON FOOTPRINT AND OTHER ATMOSPHERIC EMISSIONS

Aciturri has calculated indirect emissions for the first time based on ISO 14064-1:2018.

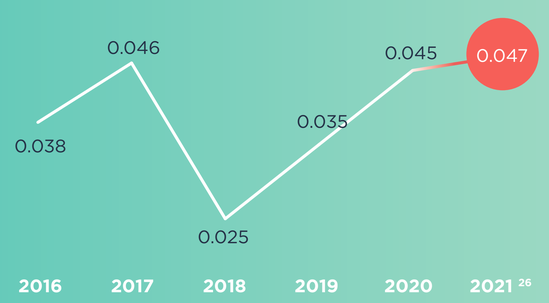


CARBON FOOTPRINT [38]	2016	2017	2018	2019	2020	2021 [39]
Scope 1 impact (tCO_2eq)	1,951	2,731	2,736	2,957	1,876	2,070
Scope 2 impact (tCO_2eq)	8,437	11,189	4,902	8,658	6,345	4,965
Total impact (tCO_2eq)	10,388	13,920	7,638	11,615	8,221	7,035
Ratio (tCO_2eq/K€ from net sales)	0.038	0.046	0.025	0.035	0.045	0.047

Total (tCO_2eq)



Ratio (tCO_2eq/K€ ventas netas)



Calculations of the carbon footprint is Aciturri's main indicator for measuring our impact on climate change. This data allows us to assess the impact of the company regarding greenhouse gases.

38. Our carbon footprint (scopes 1 and 2) is calculated based on the tool and the emission factors proposed by the Spanish Ministry of the Environment. All Aciturri plants have been included in the calculation.

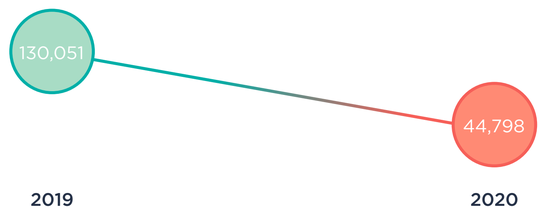
39. The data reported are provisional, as they are based on the 2020 emission factors. The organization does not have the final consumption data yet.

In 2021, Aciturri calculated indirect emissions based on the ISO 14064-1:2018 standard for the first time. The data was then verified by the company DNV-GL. Likewise, the Spanish Climate Change Office (OECC in Spanish), an organ that depends on the Ministry for Ecological Transition and the Demographic Challenge, positively resolved the request made by Aciturri to register its footprint in the Spanish Registry of Carbon Footprint. The information about Aciturri's emissions is available online **(https://www.miteco.gob.es/es/cambio-climatico/temas/mitigacion-politicas-y-medidas/registro-huella.aspx).**

Thanks to this project, we developed an internal methodology to calculate and account for all the organization's greenhouse gases, both direct and indirect. This analysis has given us a thorough knowledge of all its processes and has made it possible for us to measure partial carbon footprints for specific occasions, future projects, etc. This data has also helped improve efficiency in many logistic flows.

Now, we also have information about our 2019 and 2020 scope 3carbon footprint [40]:

CARBON FOOTPRINT
Scope 3 impact (tCO_2eq)



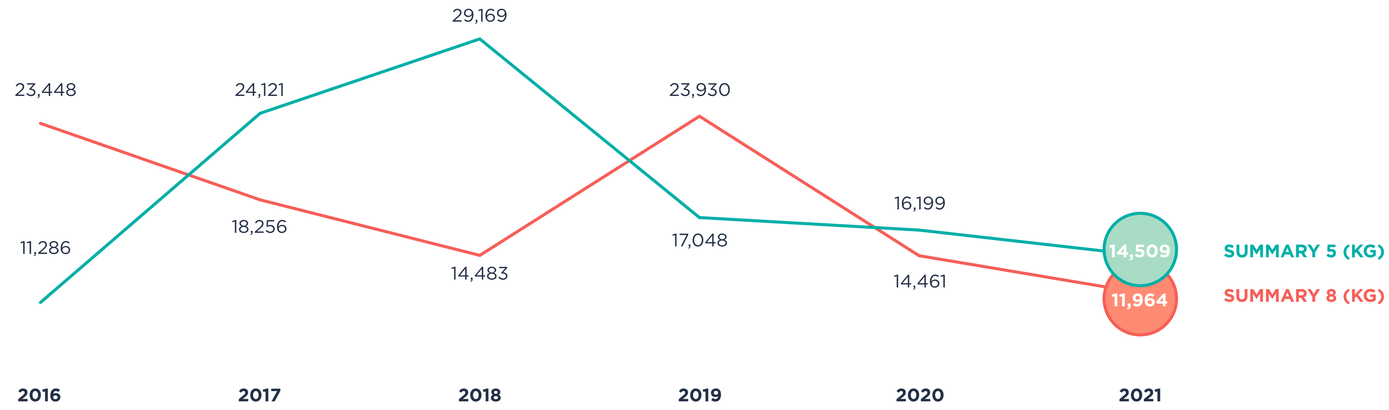
In order to calculate these indirect emissions, transport, airworthy and non-airworthy raw materials, and waste were all considered.

Apart from greenhouse gas emissions, virtually all of Aciturri's plants generate volatile organic compounds (VOCs).

These emissions are particularly significant at the Alcalá de Guadaíra and Tres Cantos plants, although they have been substantially reduced in most plants by replacing certain substances with others that have lower volatility. In order to manage them, we follow the measures proposed by Royal Decree 117/2003 on the limitation of emissions of volatile organic compounds as a by-product of the use of solvents for certain activities.

Automated access to information on REACH substances and sending it to the customer.

VOC EMISSIONS [41]



40. No emission data are available for 2021 at the time this report was being written. This will be reported next year.

41. Data based on solvent management plan. Only the solvents used in the plants whose consumption is reported to the competent authority are counted.

In 2021, we applied for an exemption from the established diffuse emissions limits on account of the availability of better techniques implying solvent changes, control programs and training. The final decision is still pending for the Alcalá and Boecillo plants.

With regard to the control of atmospheric emissions, in 2021, measurements were taken at the Ircio and Orón plants to be given authorization as a potentially atmospheric polluting activity. All measurements complied with the statutory limits.

In addition, substances subject to authorization were measured at the Alcalá and Ayuelas plants in order to comply with the REACH regulation.
In this regard, it should be noted that, in 2021, we managed to automate the process to facilitate access to information on REACH substances in the manufactured part numbers and subsequent shipping to the client in order to comply with Article 66 of the European Regulation. Workflows and responsibilities were clearly established.

Periodically, acoustic measurements are taken at the different plants. In 2021, they were specifically carried out at the Aerópolis plant, and the results showed compliance with the established regulations. However, the know from previous data that the plant at Boecillo has exceeded the legal noise levels before. This is why we devised a plan of action, which we are still working on implementing.

Light pollution in Aciturri's production plants is comparable to the lighting in the surrounding areas: the necessary level to be able to move around safely. Therefore, no specific actions were taken in this respect.



ENVIRONMENTAL MANAGEMENT

WATER CONSUMPTION & DISCHARGES

45% reduction in water consumption compared to 2017.



As with all other resources, Aciturri uses water responsibly.

The water used in our plants comes from the local sewage network—except in the plants of Ayuelas and Ircio, where there are wells—, in both cases authorized by the Ebro Hydrographic Confederation.

All the water returns to the corresponding sewage network in the form of discharge, and every physical facility generally complies with the legal limitations. However, there were some deviations regarding chromium, conductivity, barium, and iron in Ayuelas. In these cases, improvements were made to the treatment plants to increase the quality of the discharge.

The exact amount of the discharge is unknown because the plants do not have meters. However, it is estimated to be almost the same as the water consumed.

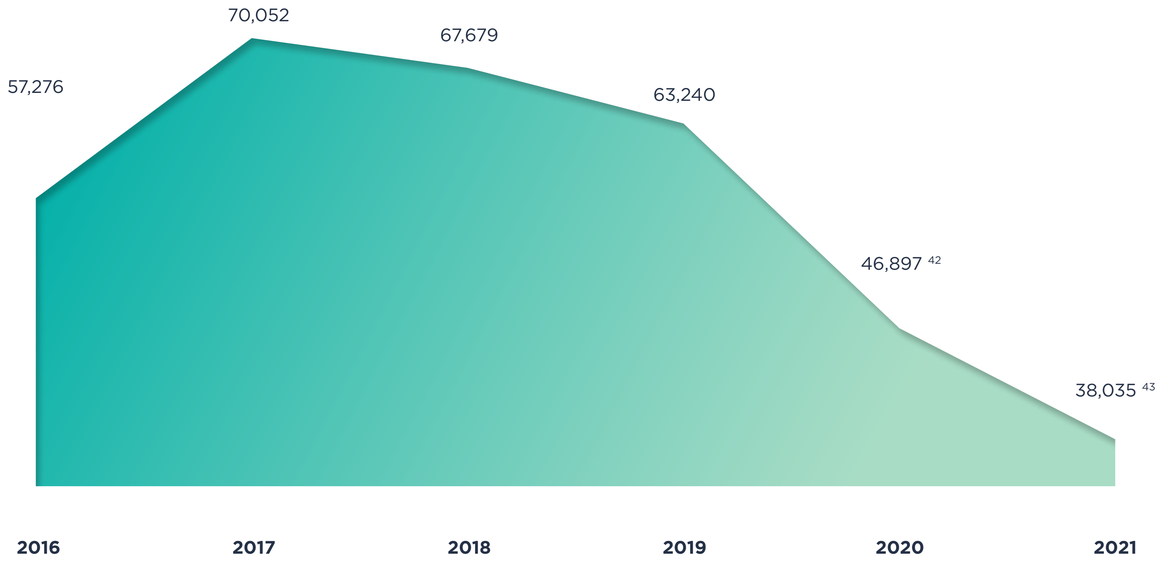
In 2021, we obtained the initial authorization for the Aerópolis plant. We are aware of the lack of permit for discharges at the plant in Alcalá de Guadaíra, this is why we are actively collaborating with the local government to take any measures necessary to address the situation.

There is no water reuse whatsoever.

And neither any evidence of water bodies or habitats having been significantly affected by Aciturri's activity.

Also, in 2021 there were no major spills. Notwithstanding, the employees are trained periodically on how to act in the event of a spill in order to ensure that we comply with all environmental and occupational risk prevention regulations, and the environmental impact is minimized if a spill were to happen in the future.

WATER AND DISCHARGES
Water consumed (m^3)



42. The data reported regarding water consumption in the 2020 Sustainability Report was an estimation and differs from this because, at the time that document was published, the actual data on water consumption for some plants was not available for quarter four of 2020. The figure specified in this document corresponds to the actual number.

43. At the time this report was finished we did not have final water consumption data available for all the plants for the last quarter of 2021, so we have calculated it based on the data from 2020.

ENVIRONMENTAL MANAGEMENT

WASTE

Waste is segregated at source and delivered to authorized waste managers to ensure proper treatment.



The industrial activity carried out in Aciturri's plants generates waste, which is sorted on location and sent to authorized management bodies. These ensure a proper and specific treatment according to their nature. In every case, we choose the option with the lowest environmental impact and try our best to avoid sending it to a landfill.

WASTE	2016	2017	2018	2019	2020	2021
HAZARDOUS WASTE DEPOSITED IN A LANDFILL (KG)	**401,065**	**410,374**	**351,954**	**366,161**	**265,617**	**229,607**
Contaminated absorbents	24,023	23,627	24,219	29,445	22,848	31,058
Adhesives and sealants	1,809	806	0	2,265	2,112	871
Empty aerosol cans	12	0	36	37	25	94.5
Water containing chromium	84,924	44,101	35,833	33,350	39,328	5,624
Batteries	0	0	0	40	16	0
Activated carbon	0	0	0	0	344	0
Painting booth filters	763	939	4,129	4,133	4,440	2,901
Fixative liquid	387	416	119	0	241	89
Developer liquid	404	355	280	0	871	78
Hazardous aqueous liquid waste	0	22,750	136,407	75,835	23,564	37,575 [44]
Sludge from machining activities	3,841	4,455	11,760	9,995	7,527	5,435
Flakes from the painting booth	0	0	77	0	1,348	0
Expired chemicals	1,505	3,433	3,187	10,789	5,985	1,387
Waste containing hydrocarbon	0	0	47	0	0	0
Lab waste	0	12	23	0	314	0
Resin	771	713	723	839	367	774
Industrial X-ray	0	0	0	0	0	0
Cutting fluids	129,303	121,329	151,319	185,102	130,043	127,020
Sludge cakes from treatment plants	29,159	22,765	19,593	14,331	26,244	16,701

44. 34,675 kg come from the evaporator outlet and 2,900 kg from the ultrasound machine at Tres Cantos.

WASTE	2016	2017	2018	2019	2020	2021
RECOVERABLE HAZARDOUS WASTE (KG)	**172,491**	**132,565**	**181,435**	**180,521**	**115,963**	**97,667**
Non-chlorinated hydraulic oil	3,517	735	973	2,157	4,669	2,451
Water with paints and inks	0	0	0	555	1,800	690
Non-halogenated solvent	3,980	8,745	4,567	2,520	5,459	5,768
Contaminated metal containers	7,962	9,578	7,969	10,507	7,962	9,058
Contaminated plastic containers	5,264	6,254	7,335	7,565	8,501	7,898
Electrical and electronic equipment	0	46	280	265	2,482	352.5
Oil filters	3,842	6,126	9,639	10,934	5,192	3,311
Fluorescent tubes	179	80	223	31	70	48.24
Zinc and alkaline batteries	0	0	15	54	40	51
Paint residues	9,151	10,744	7,679	11,341	7,886	7,540
Pre-peg residues	134,260	167,155	142,420	148,179	71,902	60,300
NON-HAZARDOUS WASTE DEPOSITED IN A LANDFILL (KG)	**673,755**	**777,569**	**863,468**	**861,515**	**498,414**	**398,445**
Sandblasting sand	2,900	2,200	1,233	3,341	1,303	1,695
Flow cleaning waste	39,000	63,000	120,000	110,000	79,820	54,120
Inert waste (comparable to urban)	631,855	716,350	742,235	748,174	417,291	342,830

WASTE	2016	2017	2018	2019	2020	2021
RECOVERABLE NON-HAZARDOUS WASTE (KG)	**1,204,701**	**1,112,543**	**2,664,516**	**1,268,684**	**841,209**	**651,968**
Aluminum briquettes	322,558	400,515	1,141,898	475,341	312,000	284,535
Titanium briquettes	12,124	11,883	24,007	31,234	27,500	22,358
Scrap metal	6,140	10,824	71,112	14,483	7,980	46,960
Solid iron	0	0	0	7,695	10	3,434
Wood	216,648	190,261	142,534	210,694	168,682	96,090
Paper and cardboard	105,814	92,596	128,377	148,667	114,442	78,652
Plastic	34,752	28,440	31,297	35,842	25,895	20,256
Stainless steel (solid and chips)	0	0	0	73,449	970	17,786
Toner	379	100	323	250	130	94
Chips[46]	174,192	145,993	186,933	165,270	132,550	36,947
Inconel chips	36,035	13,401	9,453	19,731	18,940	20,295
Titanium chips	24,675	18,883	51,721	66,719	32,110	24,561

45. 600 kg are from other solvent mixtures.
46. It includes all chips generated other than stainless steel, Inconel and titanium.

WASTE FROM CONTAINERS AND PACKAGING [47]	2016	2017	2018	2019	2020	2021
PLASTIC CONTAINERS (PLASTIC PACKAGING WASTE) (KG)	284,062	213,600	20,783	22,985	18,900	12,201
CARDBOARD CONTAINERS (CARDBOARD PACKAGING WASTE) (KG)	25,658	30,529	56,253	95,929	68,665	47,931
METAL CONTAINERS (METAL PACKAGING WASTE) (KG)	8,734	810	5,312	--	--	--
WOODEN AND COMPOSITE CONTAINERS (WOOD AND COMPOSITE CONTAINER WASTE) (KG)	79,750	61,123	140,960	126,890	101,209	98,586
OTHER CONTAINERS (TEXTILE PACKAGING WASTE)	800	1,172	50	--	--	--

47. Material recycling is performed in all cases. The amount of packaging waste generated is calculated based on the fact that 60% of all packaging becomes waste in all plants, except for logistics, where this applies to 100% of the packaging.

In 2021, we defined objectives for reducing waste; the main focus is on the search for new treatment methods such as the reuse of excess carbon fiber in non-aeronautical applications, and the recycling of sludge from EDM machines for metal recovery. In addition, we are looking for less aggressive cleaning solvents to minimize their environmental impact and the waste they generate. We are also working to improve the sorting of non-recoverable waste by using new methods, raising awareness among the staff, etc.

None of the activities carried out at Aciturri involves food waste whatsoever—there are no cafeterias for the workers in our plants either—so we don't need to work in actions aimed at reducing this type of waste.

2021 MILESTONES

In 2021, the corporate areas kept on working to achieve a sustainable growth for Aciturri.



CORPORATE SERVICES

TECHNICAL SERVICES

The team has dedicated a large part of its resources to the conditioning of the infrastructure of Aciturri's work center in Aerópolis (Seville).

The Technical Services team is committed to the company's goal of reducing the environmental impact of its industrial operations. With that in mind, we carried out a detailed analysis of all the supplies we use (electricity, gas, nitrogen...), and identified projects that will contribute to improving the energy efficiency in our facilities. The first of these has already begun to be implemented with the aim of providing mixed pressurization to the autoclaves at the Tres Cantos plant in Madrid. The team also carried out a detailed analysis of the installation options of photovoltaic energy generation systems on the roofs of all the company's work centers.

Technical Services continued to support the production areas by introducing new technologies, process improvements, maintenance, and installation and implementation of new equipment.

In 2021, the department dedicated a large part of its resources to the development of the infrastructure of Aerópolis—Aciturri's plant in the Parque Tecnológico Aeroespacial de Andalucía in Sevilla. The foundation works and buried pipelines for assembly zones are already completed, and so are several improvements to the plant's air conditioning system and the installation of a new bridge crane.

The center has also been fully integrated into Aciturri's global maintenance structure in terms of compliance with legal requirements and inclusion of machinery and installations according to the general plan of preventive maintenance.

The scope of the works at Aerópolis includes the installation and calibration of equipment for the manufacture of different programs and the fitting of the necessary infrastructures for the implementation of programs coming from the plant at Alcalá de Guadaíra in Sevilla.

The space freed up in the latter has promoted the reorganization of the plant layout and the development of a project of new foundations and infrastructures needed for the programs associated with the A400M. A new lateral access to the plant was created to accommodate the assembly of the C295 wings.

Also in Mairena, we carried out a project for compartmentalizing the plant offices, which increases the level of fire protection, significantly reduces the acoustic impact of the assembly work in the office area and cushions the acoustic reverberation in the production area.

As for the engine division, the Technical Services team completed the installation of a third RTM press system (Resin Transfer Molding) and a cooling system used by the three presses in operation that allows to reduce processing times during the cooling cycle. In this same area and within an internal technological development project, another development contributed to significantly reducing processing times; namely, a new system integrated in the preforming ovens that allows heating by conduction, convection, and radiation (or any combination of these methods) of molds and preforms, and even to focus heating on certain areas of the mold.

At the Ircio plant, the team completed a project for the implementation of the fourth Hermle machining center (milling lathe), dedicated to the manufacture of engine parts up to 800 mm in diameter made of titanium and Inconel. At the same plant, a lightweight handling system for loading and unloading elbow heads at the DMG machining center was installed, solving an important ergonomic problem due to the weight (up to 30 kg) and geometry of this type of tool.

Moreover, within the objective of integrating the Kaizen philosophy into the corporate departments, this department achieved the development, integration, and consolidation of Kaizen level 3 in 2021.

CORPORATE SERVICES

QUALITY

We have a context assessment for the company (called “Context Matrix”) which shows the annual evolution of those goals subject to long-term assessment. The result of this assessment is a SWOT Analysis (Strengths, Weaknesses, Opportunities, and Threats) that considers both the internal and external visions of the goals.

There is also a risk procedure in place—PSC-061—to analyze the risks for each department. In 2021, a relevant amendment to this procedure was developed and approved, which led to modifications in the risk assessment templates. This new edition of the procedure will be implemented in 2022.

The Quality team kept on working with the aeronautical industry stakeholders, especially with two: the Spanish Association for Quality (AEC), in which Aciturri is a management member for the Aerospace Committee, and the Working Groups at TEDAE (Spanish Association of Defense, Aerospace and Space Technologies). Here, the team collaborated with other industry companies to develop working guidelines on practical tools for the Defense, Security and Aerospace sector, e.g. industrialization, industry 4.0, and non-conformities in PECAL audits. In 2021, Aciturri participated again in the Joint Committee for the Defense & Arms and Defense Materials Industries (CMDIN in Spanish) as the representative of the defense industry companies.

The Quality team ensured compliance with contractual requirements and with those linked to existing certifications—both standards like ISO or EN, and those imposed by clients, civil aviation and defense authorities. Aciturri is ISO 9001 and EN9100-certified in all plants; POA-certified in all aerostructures plants (except for Getafe) according to EASA21G; EN9110-certified in the assembly plant (which operates in clients’ facilities); ISO 17025 certified for calibrations carried out in the Tres Cantos plant; PECAL 2110 and PECAL



2310-certified in Tres Cantos (manufacturing + design/development Ayuelas, and Orón. We also have the Nadcap certifications as required by manufacturing technology.

In 2021, we earned new certifications which are important for business development and customer requirements. Some of these new certifications have been part of our processes (Nadcap Aero Structure Assembly accreditation in Boecillo and certification of all the processes carried out at Aerópolis, including the Nadcap accreditation for painting). Other certifications were linked to the management system such as the certification under EN9100 in Aerópolis and the EN9120 in Berantevilla Logística, which allows the manufacture and distribution of materials.

These certifications represent strict compliance with the applicable regulations and laws, and the traceability of every product; all materials used and people involved in their manufacturing and assembly are recorded, as well as the certifications of the processes that back them up. Their use and maintainability are contingent to revisions of the design, first article inspections (FAIs), and official certification tests. According to the Context Matrix, these are crucial issues for clients, civil and military aviation authorities, subcontractors, service companies that operate in our facilities and the employees themselves. Proper management allows us to ensure quick response times, adaptability to clients' needs and any legal changes that may occur and monitor subcontractors.

In addition to these process and management systems certifications, the "Quality First" initiative was launched in 2021—an improvement project for the entire company that aims to avoid customer rejections and achieve results that allow us to position ourselves as a benchmark organization in the industry.

Every product launched into the market by Aciturri is monitored and evaluated to ensure its compliance with contractual requirements, the standards behind the applicable certifications and current regulations, as well as its safety, a key aspect in the sector.

In 2021, there were no cases of non-compliance with regulations or voluntary codes associated with the impact of products and services on health and safety.

Labeling of products manufactured by Aciturri does not require component details or handling instructions for safe use of the product. This information is included in the drawings. The certificate of conformity issued and signed by Aciturri for all our products has the sales part number, which includes data to identify the components and people involved in their manufacturing. This certificate also ensures that the parts are newly manufactured, and some of them are audited by EASA to assess this issuance of certificates.

In 2021, we successfully informed one of our main clients about all the MDF substances contained in each of the part numbers Identifying and packaging the components is key to avoid fraudulent or counterfeit materials in the manufacturing process, and to ensure the optimal delivery conditions, which is why this point is included in the new PSC-35 industrialization procedure developed in 2021.

"Quality First" **aims to ensure that Aciturri's products meet customer requirements.**

CORPORATE SERVICES

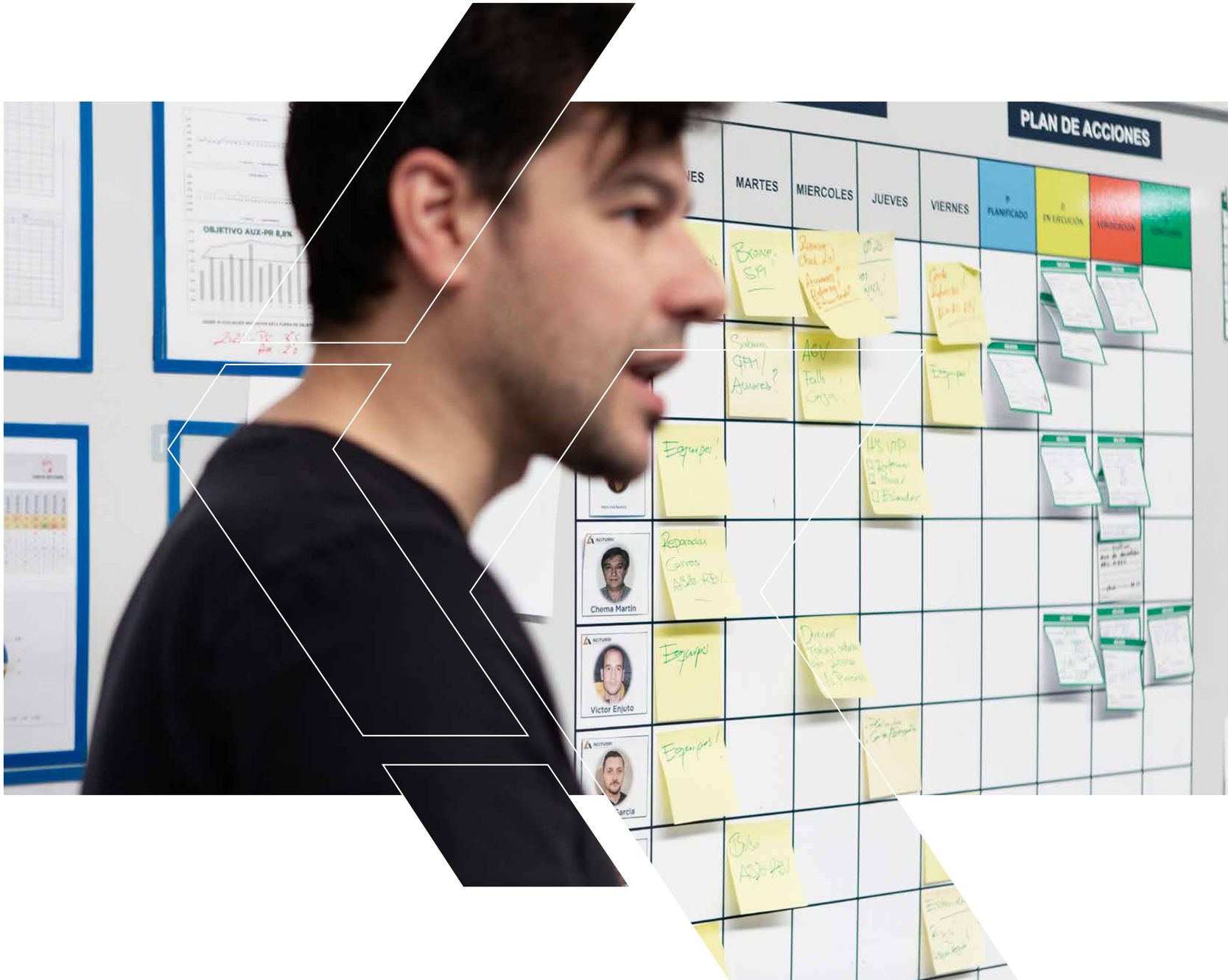
LEAN MANAGEMENT

Despite the uncertainty and restrictions stemmed from the pandemic, we have continued basing our methodology on the lean model and focus on achieving strategic goals and moving ahead with our global business plan.

The staff made progress with the continuous improvement model by adapting the way natural teams worked following the restrictions at any given time; the teams in the production environment recovered face-to-face meetings by applying the necessary prevention measures. Simultaneously, many of the work sessions of the support and multifunctional teams were possible with the support of digital tools. In any case, the lean spirit of improvement and teamwork was always kept intact.

Engineering teams adopted the continuous improvement model already in place in other departments. The Product Definition Engineering and Development Engineering natural teams were defined with the purpose of working on continuous improvement and standardization. As in other areas, 10 standardized weekly meeting dynamics using Kaizen panels were started to

The engineering teams have been incorporated into the continuous improvement model.



improve resource organization and risk detection in projects, measure team performance and evolution by establishing appropriate metrics, and especially, guide people to improvement, ensuring it is extended to all projects and avoiding good practices from vanishing when a project is completed. The overall feeling is very positive, mainly because it meant that the engineering teams speak the same "language of improvement" as the rest of the company.

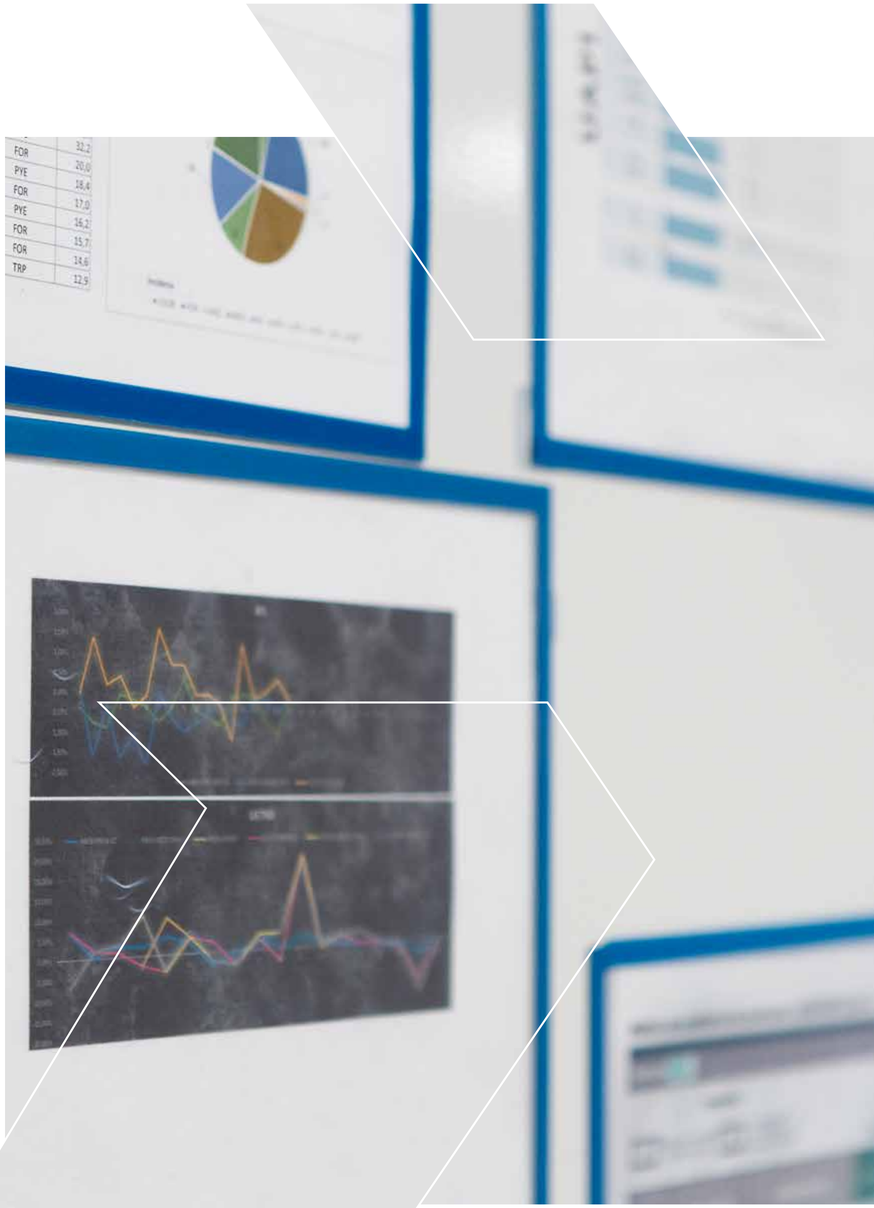
Throughout the year, the teams implemented a total of 5,187 improvements, almost five improvements per person per year. The digital tools for managing these improvements were also improved and 42 of them were considered "success cases" and shared with the organization as a whole so that they can be applied by other teams.

The cultural and tool usage model audits were maintained through a comprehensive questionnaire and an audit with external participation, while the strategy continued to be implemented through the Hoshin Kanrie methodology, which resulted in almost 100 projects by multidisciplinary teams.

In 2021, the team completed the development of an industry 4.0 strategy whose first projects are already defined in the areas of robotization, machine learning, simulation, and paperless, and will bear their first fruit in 2022.

In the field of automation, the Lean Management Department led the implementation of 100 bots—admin processes automation by using the Rocketbot software, based on the Python programming language—that made it possible for us to dedicate to higher added value tasks about 17,000 hours that, until then, were spent on repetitive or purely administrative tasks.

The teams have implemented a total of 5187 improvements, almost five per person per year.



CORPORATE SERVICES

SYSTEMS MANAGEMENT

The Hardware and Communications division continued to support operations, especially by enabling the systems at the company's new facilities in Sevilla, so that the plant can be fully operational during the next year.

The team completed the installation of a new work area in accordance with the strict safety specifications for new projects. It also connected the required systems with the Lilium client and implemented the cloud-based manufacturing flow simulation tools at the plant.

With regard to cybersecurity, the System Management team undertook an important number of actions aimed at identifying (through the performance of external audits and intrusion tests) the risks to which the organization is exposed, and to raise awareness among the staff of how crucial their role is, mainly where prevention is concerned. The information gathered served as a basis for designing the 2022-2024 Cybersecurity Plan, which includes projects aimed at controlling and mitigating the level of risk, as well as minimizing the impact of a hypothetical incident on the company's operations.

The 2022-2024 Cybersecurity Plan incorporates projects aimed at controlling and mitigating the level of risk and minimizing the impact of a hypothetical accident.

The corporate collaboration solution migration project (replacing Skype for Business with Microsoft Teams) focused the team's efforts on management support. This new solution not only incorporated audio and video conferencing functions, it also allowed to generate shared work environments across departments and between companies, which had a positive impact on productivity in the COVID-19 scenario. Likewise, collaboration options with the Alestis team increased significantly through projects such as e-mail system integration, voice and data network unification, building a common printing system, or moving all cloud-based platforms into a single vendor.

Also in 2021, the team continued to take steps to simplify and migrate the company's systems to the cloud, improving the efficiency of direct and indirect costs and improving application performance and availability.

On the Software team, the efforts were directed especially toward supporting operations through three projects: standardization of the production planning model at Tres Cantos; extension of the management of paper-based single administrative documents (SAD) for imports and exports at the plant in Sevilla, and the automation in the REACH substances report preparation.

At the same time, the Software team continued working on the ERP integration project (in collaboration with the Finance Dept.) in order to incorporate investment management. It also assisted other areas such as System Quality Assurance by providing the necessary support in initiatives related to tooling control, the standardization of the different defects catalogs in the quality of the product, and the control of the required certifications in the production process.

Finally, the team consolidated their reporting model, based on Business Intelligence, by implementing various reports that enable advanced analysis and provide KPI on key business points.



CORPORATE SERVICES

LEGAL DEPARTMENT

In 2021, Aciturri wasn't involved in any investigation in relation to anti-competitive behavior or monopolistic practices.

Likewise, to the best of our knowledge, in there were no formal complaints concerning violations of customer privacy—no data leaks, theft or 2021 loss.

In any case, in compliance with the confidentiality obligations with our clients, and also with the intention to protect our own confidential information, at Aciturri we ask suppliers and third parties to sign NDAs before they can access any sensitive or confidential information. In 2021, approximately 140 NDAs were signed. In addition, all employment contracts include specific confidentiality clauses.

Regarding compliance with laws or regulations in the economic or social scopes, in 2021 Aciturri's companies (namely, Aciturri Assembly, Aciturri Aeroengines, and Aciturri Engineering) incurred six penalties amounting to €592.34. Specifically, Aciturri Assembly had to pay a penalty of €40 for the incorrect filing of an import SAD with the Madrid Customs Office, which belongs to the National Agency for Tax Administration. There was also a penalty of €104 caused by a delay in sending data relating to the annual 2020 industrial survey of products, imposed by the National Statistics Institute. For its part, Aciturri Aeroengines paid a penalty of €96 by the National Agency for Tax Administration for late filing of document 349 (declaration of intra-community operations) for period 08 of 2021, as well as a penalty of €210.70 by the Head of Transport Inspection Service of the Council of Álava for a violation concerning the maximum authorized weight for a vehicle. Aciturri Engineering paid two surcharges of €70.82 (a total of €141.64) for non-compliances related to the Central Treasury for Social Security.

Finally, the company has a **Responsible Advertising Policy.** There were no breaches in marketing communications in 2021.



CORPORATE SERVICES

COMPLIANCE

At Aciturri, we take action against facts, attitudes, and/or behaviors that threaten those values and ethical principles that we deem fundamental rights, regardless of whether or not they are considered a crime.

We have a **Regulatory Compliance Program (Corporate Compliance)** whose goal is to ensure compliance with legal requirements, paying special attention to those that may incur criminal responsibility for the organization from actions taken by our employees. This program is based mainly on the adoption and implementation of monitoring and control measures, the periodic review of the **Crime Prevention Model,** the existence of an autonomous and independent body in charge of ensuring everything works (the "Ethics and Compliance Committee"), Aciturri's Code of Conduct, our Channel for Complaints, and a system for ongoing training and information on regulatory compliance.

Specific training on the Crime Prevention Model has been given to 126 people.

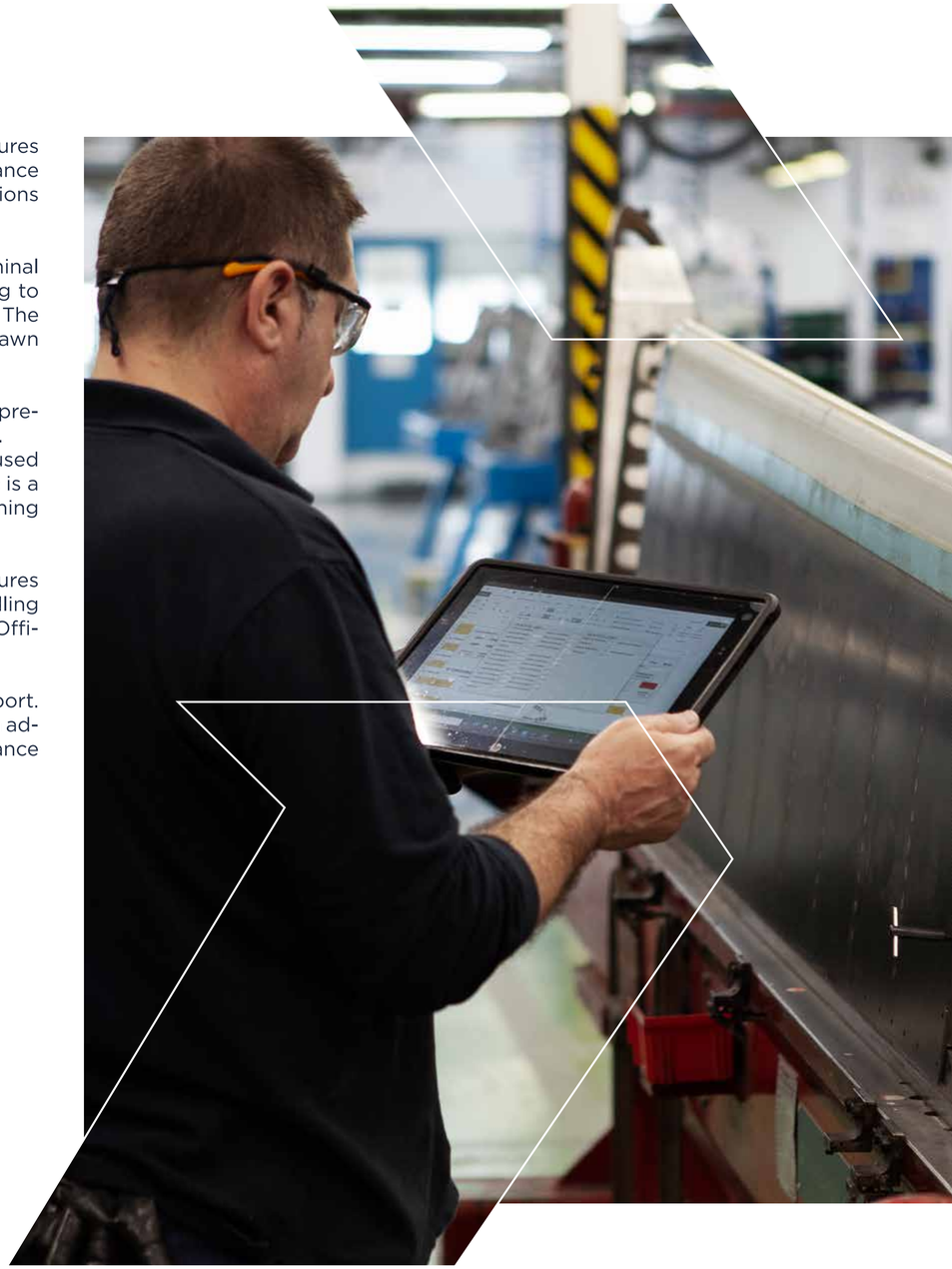
Our **Code of Conduct** and our **Anti-corruption Policy** include the measures we adopted to prevent and combat corruption. The External Compliance Officer shall ensure, together with the different departments and divisions within the company, compliance with such measures.

According to the normative mandate of article 31 bis 5. 6th of the Criminal Code on periodical checks, the company performs constant monitoring to prevent, detect, and take action in the event of potential criminal risks. The conclusions of this process are reflected in the annual review report drawn by the Compliance Officer, who is responsible for detecting new risks.

Aciturri has a proprietary **Electronic Device Use Policy,** a basic tool to prevent criminal behavior through the use of devices and digital resources. **The Channel for Complaints (canaldedenuncias@aciturri.com)** may be used to report social, environmental or any other type of irregularities. There is a form available so anyone may confidentially report irregularities concerning Aciturri. This channel is serviced by the Compliance Officer.

The **Ethics & Compliance Committee** is the autonomous body that ensures regulatory compliance. Among other tasks, they are in charge of handling any submitted complaints previously investigated by the Compliance Officer.

In 2021, 126 people did the specific training on the Crime Prevention Report. Since it was launched, a total of 696 employees have participated in it. In addition, a specific procedure was developed to ensure regulatory compliance for **digital certificates.**



As for preventing money laundering, Aciturri is not required to comply, according to article 2 of Law 10/2010, of April 28, on the prevention of money laundering and the financing of terrorism. Nonetheless, the company adopted measures to combat it. Some of them are as follows:

- **Any person who wants to establish a relationship with Aciturri must show relevant identification.**
- **Cash payments are not accepted.**
- **Special attention is paid to so-called "triangular operations"—when a client or supplier informs that a third party will be receiving the payment for an invoice.**
- **All the company's payments and receipts are carefully recorded on a daily basis. If the finance manager should detect unjustified operations, they will immediately report the incident to the Compliance Officer.**
- **All financial transfers are identified and duly recorded in the accounting books.**
- **In cases where there is evidence that the entity wanting to work with Aciturri is participating in money laundering operations, we conduct diligent checks of the account holder's identity. If such suspicions turn out to be true, the Compliance Officer shall bring it to the attention of SEPBLAC, the Spanish Commission for the Prevention of Money Laundering and Monetary Offenses.**

Aciturri's **Código de Conducta** can be accessed **here.** After its approval in 2017, the code was ratified by all management members and partners, who showed their commitment to ensuring compliance in writing.

In 2021, we received 101 inquiries (as opposed to 78 the previous year) concerning regulatory compliance and the principles within the Code of Conduct, all of which were resolved, and two suspected cases (as opposed to three in 2020), all archived once the likelihood of the crime was ruled out. None of them relate to Human Rights.

Aciturri has had a **Purchasing and Subcontracting Policy** since 2014—a document in which we demand that our suppliers and contractors comply with the principle of Ethical Behavior, referring explicitly to "the development of their business showing a behavior based on integrity and professional ethics, avoiding conflicts of interest, bribery or any other form of corruption, as well as the practice of anti-competitive behavior." Since its approval by our Senior Management, this policy is part of the documentation handed to subcontractors and has also been distributed to Aciturri's supply chain.

All the contracts we signed with our suppliers include an Ethics & Compliance clause which requires all suppliers "to comply with Aciturri's Code of Conduct, as well as with our Supply Chain and Anti-corruption policies and the Protocol for the Prevention of Harassment. They must state that they have read and understood the obligations contained in these documents."

In 2021, Aciturri published its **Conflict Minerals Policy,** which aims to combat child labor, prevent corruption, combat the financing of armed conflict and finance plots for the exploitation of human beings. This policy is available **here**: This policy must be accepted by all suppliers through the appropriate contractual clause.

As a novelty, in 2021 the Board of Directors approved the **Policy on the Granting and Use of Powers of Attorney,** which establishes the rules that apply to Aciturri's proxies in the use of the powers granted to them.

Since we implemented this, no disciplinary proceedings or corruption-related complaints of any type have been filed.

The *Conflict Minerals Policy* outlines the principles of responsible mineral sourcing.

PARTNERS



Social action, local development and collaboration with professional organizations, administration and knowledge centers.

PARTNERS

PROFESSIONAL ORGANIZATIONS

Aciturri is a member of several professional organizations with which we collaborate to develop strategic plans and promote the industry, as well as professional training and exchange of good.

- ADDIMAT (ASOCIACIÓN ESPAÑOLA DE TECNOLOGÍAS DE FABRICACIÓN ADITIVA)
- ASOCIACIÓN DE USUARIOS DE SAP ESPAÑA
- ASOCIACIÓN ESPAÑOLA DE TÉCNICOS EN MÉTODOS Y TIEMPOS
- ASOCIACIÓN ESPAÑOLA ENSAYOS NO DESTRUCTIVOS
- ASOCIACIÓN ESPAÑOLA PARA LA CALIDAD
- ASOCIACIÓN PARA EL PROGRESO DE LA DIRECCIÓN
- CÁMARA DE COMERCIO DE VALLADOLID
- COLEGIO DE INGENIEROS INDUSTRIALES BURGOS
- EMPRESA FAMILIAR DE CASTILLA Y LEÓN
- FEDERACIÓN DE ASOCIACIONES EMPRESARIALES (BURGOS)
- FUNDACIÓN HÉLICE (CLÚSTER AEROESPACIAL DE ANDALUCÍA)
- HEGAN (CLÚSTER AEROESPACIAL DEL PAÍS VASCO)
- MANU-KET (PLATAFORMA TECNOLÓGICA ESPAÑOLA DE FABRICACIÓN AVANZADA)
- MATERPLAT (PLATAFORMA TECNOLÓGICA ESPAÑOLA DE MATERIALES AVANZADOS Y NANOMATERIALES)
- PAE (PLATAFORMA TECNOLÓGICA AEROESPACIAL ESPAÑOLA)
- RED ESPAÑOLA DE DIRECTORES DE RRHH
- RED ESPAÑOLA DEL PACTO MUNDIAL NACIONES UNIDAS
- SPACE (SUPPLY CHAIN PROGRESS TOWARDS AERONAUTICAL COMMUNITY EXCELLENCE)
- TEDAE (ASOCIACIÓN ESPAÑOLA DE TECNOLOGÍAS DE DEFENSA, AERONÁUTICA Y ESPACIO)

PARTNERS

PUBLIC INSTITUTIONS

Aciturri collaborates with public institutions and local governments by offering non-professional internships and training and employment.

- AYUNTAMIENTO DE BOECILLO
- AYUNTAMIENTO DE ALCALÁ DE GUADAIRA
- AYUNTAMIENTO DE MIRANDA DE EBRO
- AYUNTAMIENTO DE TRES CANTOS
- SERVICIO PÚBLICO DE EMPLEO DE CASTILLA Y LEÓN (ECYL)
- GOBIERNO DEL PRINCIPADO DE ASTURIAS
- GOBIERNO VASCO
- JUNTA DE ANDALUCÍA
- JUNTA DE CASTILLA Y LEÓN

PARTNERS

KNOWLEDGE INSTITUTIONS

Aciturri collaborates with various institutions to conduct research projects, offer professional and non-professional internships, and help with Bachelor's theses and case studies.

AIMEN CENTRO TECNOLÓGICO

CARTIF

CEIP SIMÓN DE COLONIA

CIDAUT (FUNDACIÓN PARA LA INVESTIGACIÓN Y DESARROLLO EN TRANSPORTE Y ENERGÍA)

CIFP JUAN DE HERRERA

CIFP MEDINA DEL CAMPO

CTME (CENTRO TECNOLÓGICO DE MIRANDA DE EBRO)

DEUSTO BUSINESS SCHOOL

ENASA

ESCUELA DE NEGOCIOS CÁMARA DE COMERCIO DE VALLADOLID

FIDAMC (FUNDACIÓN PARA LA INVESTIGACIÓN, DESARROLLO Y APLICACIÓN DE MATERIALES COMPUESTOS)

FUNDACIÓN CENTRO TECNOLÓGICO

IK4 RESEARCH ALLIANCE

INSTITUTO TÉCNICO INDUSTRIAL

IDONIAL

TECNALIA RESEARCH & INNOVATION

TECNUN

TWI (THE WELDING INSTITUTE, UK)

UNED

UNIVERSIDAD DE BURGOS

UNIVERSIDAD DE LEÓN

UNIVERSIDAD DE PAÍS VASCO

UNIVERSIDAD DE SEVILLA

UNIVERSIDAD DE VALLADOLID

UNIVERSIDAD POLITÉCNICA DE MADRID

PARTNERS

SOCIAL ACTION

Solidarity, sports, health promotion projects, and projects related to entrepreneurship and training for young people.

At Aciturri, we are totally aware of how our industrial activity impacts society and the potential of our initiatives for the benefit of our surroundings.

For this reason, we support often charity and sports projects that promote a healthy lifestyle, as well as initiatives regarding entrepreneurship and training for young people.

In 2021, the pandemic led to adjustment and expenditure control measures in all areas. This situation made it impossible for us to maintain all the collaborations we had established to promote physical exercise and healthy habits, and cultural activities in local communities, and help the sick and people with different abilities.

Despite this situation, Aciturri continued its collaboration with organizations such as San Agustín de las Hijas de la Caridad en Vera children's home, in Almería, and Asociación Síndrome de Down Burgos (association for Down syndrome patients).

In 2021, Aciturri renewed the agreement with the Hijas de la Caridad de San Vicente de Paul de Vera reception center, in Almería, whereby we committed to providing young people placed in the center with financial support to advance their academic training, including university studies, vocational training and internships with us. Specifically, this year's budget included the financial resources needed to cover the tutoring received by the students who live in the center.



PARTNERS

DEVELOPMENT IN THE LOCAL COMMUNITIES

At Aciturri, we strive to create value and bring stability to the areas where we run our business.



All our industrial facilities remain in the area where they were originally opened or incorporated into the society: Miranda de Ebro, since 1977; Tres Cantos and Boecillo, since 2009; Alcalá de Guadaíra, since 2010; and Aciturri Getafe (previously Acatec) and Alestis, since 2019.

We also promote economic activity and job creation beyond our own business. The initiatives developed in Miranda de Ebro are a blatant example. However, in the last two years, there was a slump in the demand and, as a result, in workload due to the pandemic, which resulted in a lower annual turnover and in an economic impact on the communities.

No significant, negative impacts, whether real or potential, have been identified in local communities.

All industrial facilities remain in the locations in which they were created.

INSTITUTO TÉCNICO INDUSTRIAL FOUNDATION

This is a vocational school located in Miranda de Ebro offering intermediate and advanced training and courses on supply and demand.

The school opened under the sponsorship of the religious order Compañía de Jesús. However, in 1999 the order announced the center's closure, which could have had devastating consequences in a town with such industrial tradition. We couldn't let that happen, for this school was one of the main sources of professional qualification in industrial sectors, and the only one in the field of machining.

For this reason, Ginés Clemente, Aciturri's founder and CEO, promotes a foundation of different enterprises (including Aciturri) which took it upon themselves to ensure the continuity of the school. This allowed to provide further formal education, while boosting training and services to companies.

Today, the Instituto Técnico Industrial trains qualified professionals for the nearby businesses and is one of the educational references in the area. In addition, its staff was able to keep their jobs.

The center has expanded its offer with the creation of a Hospitality Management School, and the incorporation of vocational school intermediate and advanced modules.

MIRANDA DE EBRO TECHNOLOGY CENTER

The CTME is a technology center established in 1992 and funded by the nonprofit organization CTME Foundation.

This privately-managed foundation is made up of 40 companies based in or around Miranda de Ebro. Ginés Clemente, CEO and founder of Aciturri, is the president of the board of trustees. Its goal is to help nearby enterprises by increasing their competitiveness and technological development through R&D&I.

From Aciturri, we have promoted the implementation of one of our lines of business in the center—the aerospace industry. Today, it offers an extensive service portfolio for a sector that sells both in Spain and other European countries.

BEBOT

Since 2018 and together with Fundación Caja de Burgos and Fundación Galletas Coral, Aciturri has supported the Bebot educational project, set in Miranda de Ebro and aimed at promoting scientific and technological interests in children and young people.

It includes different activities; namely, a robotics program for 6-to-16-year-olds involving a project to participate in the First Lego League international competition, and the "Entre Fogones" space, a monthly event that brings together science and cooking, and attracts about 40 people.

The participants have the support of a group of Aciturri employees, who voluntarily dedicate some hours of their weekend to taking part in the robotics workshops and guiding the work of the groups to prepare their project for the different stages of the First Lego League competition.

Unfortunately, in 2021, the restrictions imposed by the pandemic did not allow for the normal development of these activities. Aciturri and the other partners involved in the initiative will resume the activities within the Bebot project when health conditions allow to do so safely.

POLO POSITIVO

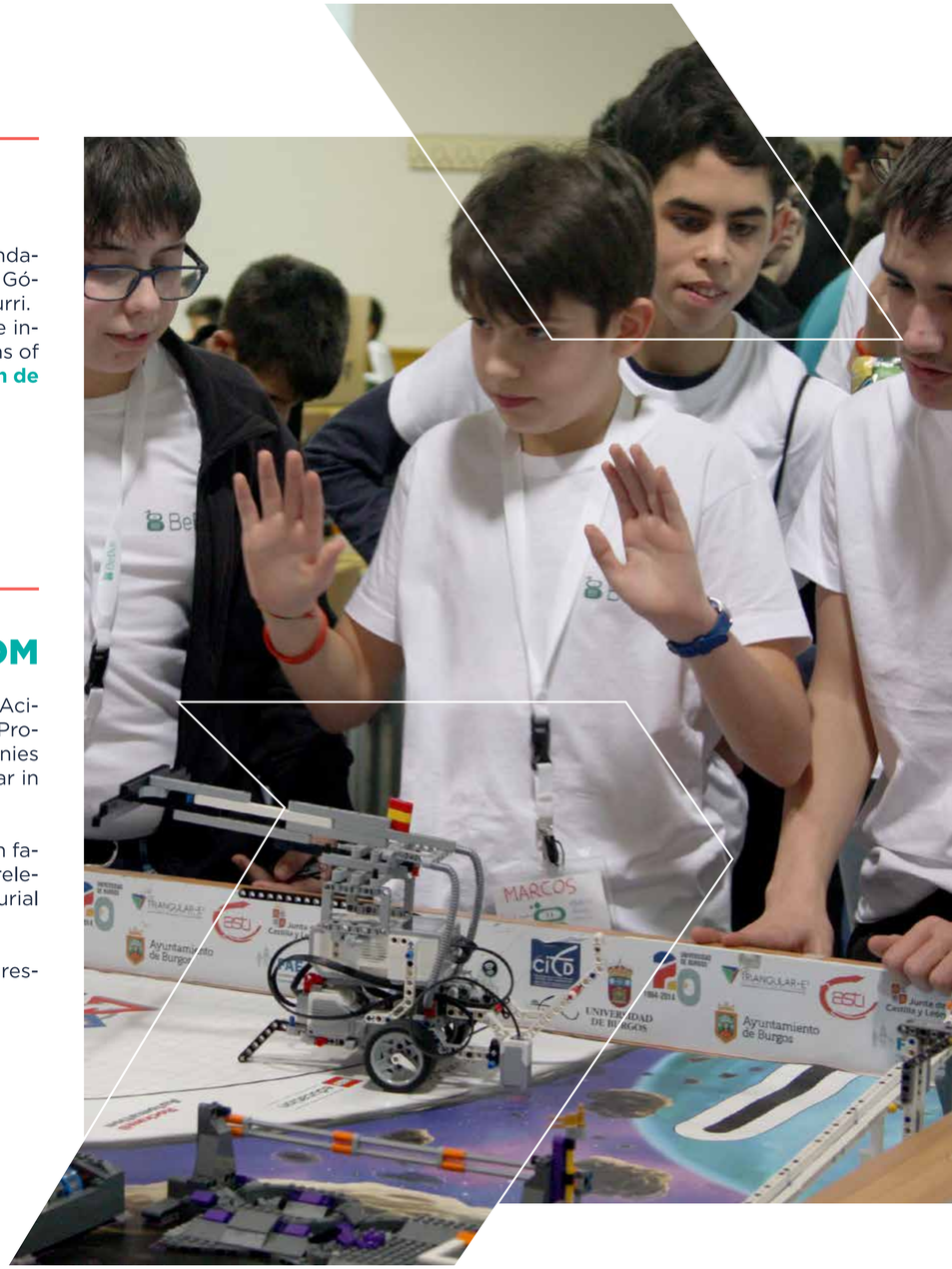
Polo Positivo is an industrial project accelerator launched by two foundations—Fundación Caja de Burgos and Fundación Tomás Pascual y Pilar Gómez-Cuétara—and three companies—Gonvarri, Grupo Antolín and Aciturri. In 2021, the promoting partners renewed their participation to promote industrial entrepreneurship in Burgos. The activities to ensure new editions of the accelerator's main programs were resumed: **Desafío Industrial, Imán de Ideas** and **Impulso PYME.**

FAMILY BUSINESSES IN THE CLASSROOM

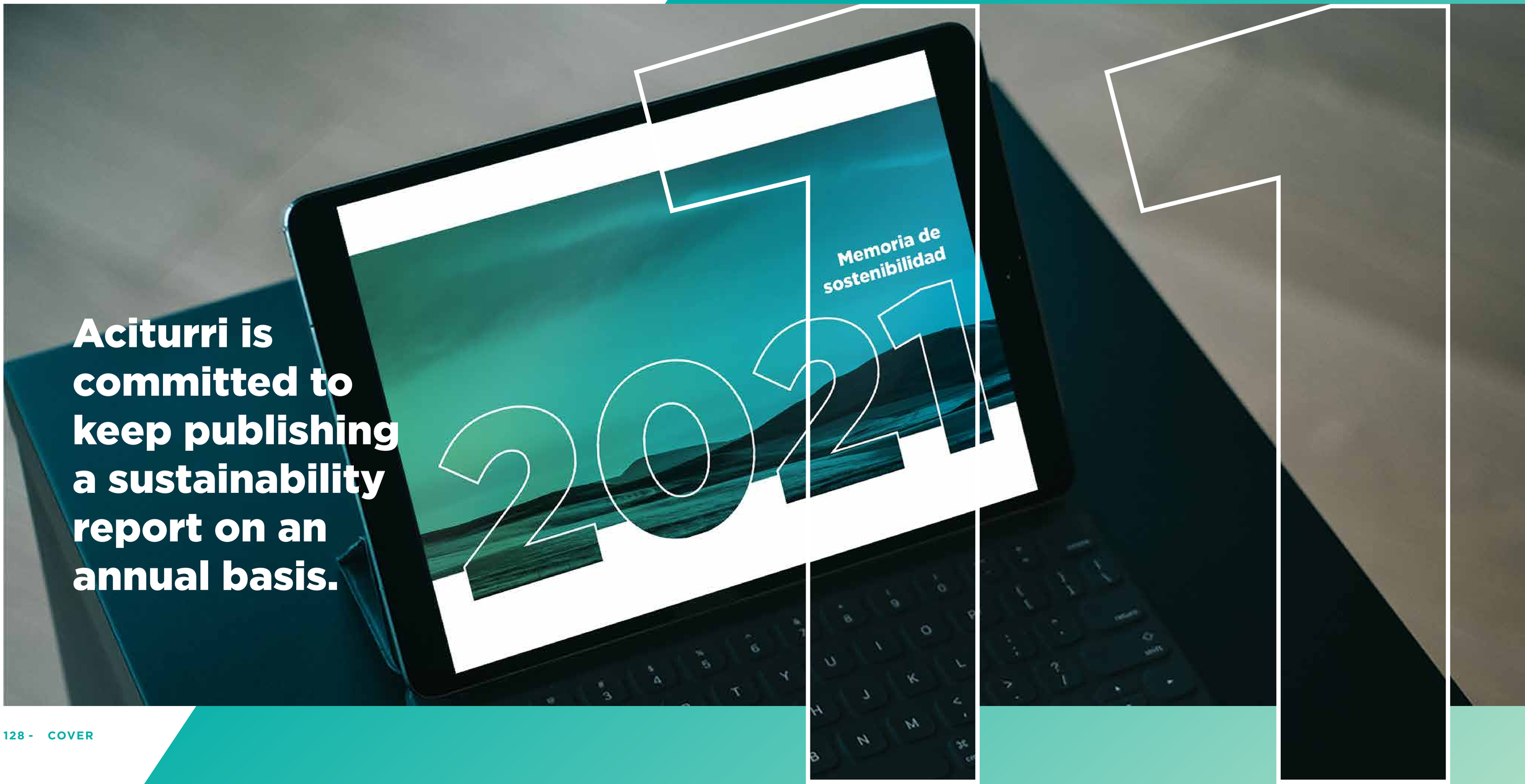
In collaboration with the association Empresa Familiar and since 2018, Aciturri has been participating in the Family Businesses in the Classroom Program, a project aimed at strengthening the content related to companies and entrepreneurship included in the school curricula for the senior year in primary school and three different years in high school.

The program promotes the direct contact of students and teachers with family companies in order to learn about their values and their role and relevance in our economy and society, while also promoting an entrepreneurial spirit among young people.

In 2021, Aciturri's president could not participate because of COVID-19 restrictions, but he has already committed to be there in the 2022 edition.



ABOUT THIS REPORT



Aciturri is committed to keep publishing a sustainability report on an annual basis.

ABOUT THIS REPORT

Aciturri's 2021 Sustainability Report is an account of our economic, environmental and social performance and its results between January 1 and Friday, December 31, 2021. This is the fifth one that has been published, following the ones from 2017, 2018, 2019, and 2020.

This report was drawn up in accordance with the GRI Standards, a key aspect to us. We also took into account at all times the provisions under Law 11/2018, of December 28, an amendment to the Code of Commerce. This revised text of the Capital Corporations Act was approved by Royal Legislative Decree 1/2010, of July 2, and Law 22/2015, of July 20, on accounts auditing regarding non-financial information and diversity. This means that this report is also the company's non-financial information statement. This document on non-financial statements was included as a separate item on the agenda for its approval by the Board of Directors on March 30, 2022.

We are still committed to publishing a Sustainability Report on an annual basis.

There were no significant changes in the reporting year.

The entities included in this Sustainability Report are Aciturri Aeronáutica, S.L.U., Aciturri Aerostructures, S.L.U., Aciturri Engineering, S.L.U., Aciturri Assembly, S.A.U., and Aciturri Aeroengines, S.L.U. Aciturri Additive Manufacturing, S.L.U., and Aciturri Getafe S.L.U. As the parent company, Aciturri Aeronáutica wholly owns the others.

There are other companies linked to Aciturri Aeronautics; namely, Caetano Aeronautic, S.A., owned at 50%; Payload Aerospace, S.L., owned at 15.54%; and Bound 4 S.L., owned at 3.18%. They are both independent organizations, so Aciturri doesn't intervene in their management. This is why this report includes no information about them, unless otherwise specified.

Likewise, this document includes no information about Alestis Aerospace, S.L. because this company and Aciturri Aeronáutica, S.L.U. keep their own management and governing bodies—each company has its own Board of Directors. Therefore, Alestis Aerospace, S.L. has its own independent report.

Nacho Fernandez, Head of Communications and CSR at Aciturri, is the contact person for questions about this document (Nacho.Fernandez@aciturri.com).

The contents of this report (and the previous ones presented by the company) have been selected based on the stakeholders' principles of inclusion, sustainability context, materiality and thoroughness. We started compiling the content with two things in mind—the analyses the company had carried out among stakeholders, as well as their needs and expectations (dialogue model with these interest groups); and the commitments we took on as signatories of the United Nations Global Compact.

On this basis few members of the organization were selected to represent stakeholders in the 2017 report. The specific group was chosen on account of their ongoing dialogue with those same stakeholders. These people individually assessed the relevance of the economic, environmental and social impact of each of the topics proposed by the GRI Standards, and also how much influence these three aspects have on the stakeholders' evaluations and decisions[48].

For the 2020 report, this analysis was completed, and the concept of risk management was introduced. This way, the impact assessment (consequences × probability) is modified, and adds value thanks to the company's risk management on each area.

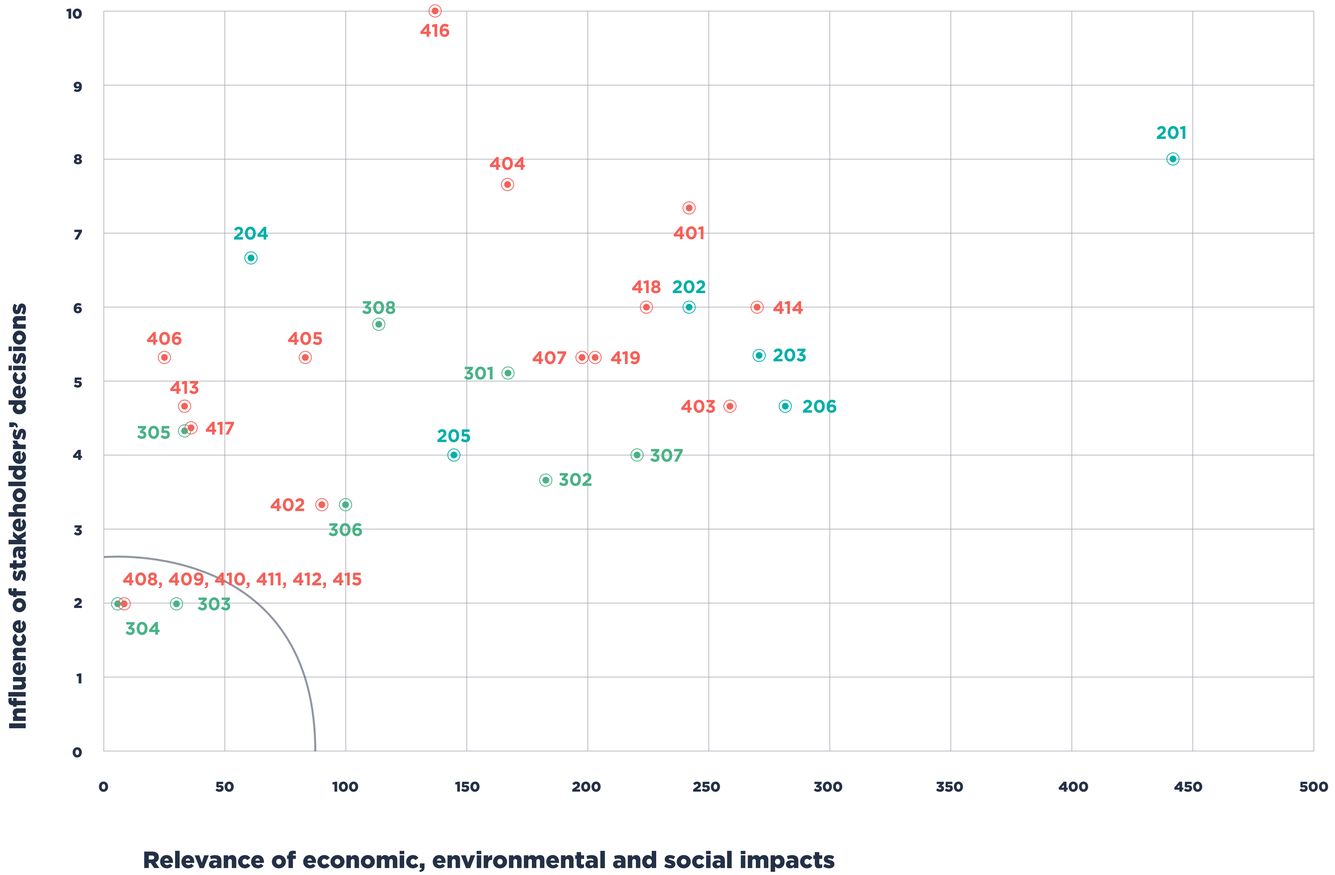
Finally, during the preparation of the 2021 report, we reviewed again the materiality matrix from the perspective of risk management. It resulted in changes in the position of two aspects: energy and employment. However, there are no major changes to the list.

There were no significant changes in the reporting year.

48. Standard 207 (taxation) was not assessed at the time because it had not been published yet, and although its impact on the organization and its influence on stakeholders don't justify its relevance for the organization at the present time, this document reports information on the subject).

ABOUT THIS REPORT

MATERIALITY MATRIX



The updated materiality matrix is as shown in the image:

ECONOMIC STANDARDS

- 201 Economic performance
- 202 Market presence
- 203 Indirect economic impacts
- 204 Procurement practices
- 205 Anti-corruption
- 206 Anti-competitive behavior

ENVIRONMENTAL STANDARDS

- 301 Materials
- 302 Energy
- 303 Water
- 304 Biodiversity
- 305 Emissions
- 306 Effluents and waste
- 307 Environmental compliance
- 308 Supplier environmental assessment

SOCIAL STANDARDS

- 401 Employment
- 402 Labor/Management relationships
- 403 Occupational health and safety
- 404 Training and education
- 405 Diversity and equal opportunities
- 406 Non-discrimination
- 407 Freedom of association and collective bargaining
- 408 Child labor
- 409 Forced or compulsory labor
- 410 Safety practices
- 411 Indigenous peoples' rights
- 412 Human rights assessment
- 413 Local communities
- 414 Supplier social assessment
- 415 Public policy
- 416 Customer health and safety
- 417 Marketing and labeling
- 418 Customer privacy
- 419 Socioeconomic compliance

Material issues are located on the curve. See table.

Economic Standards

ECONOMIC PERFORMANCE
MARKET PRESENCE
INDIRECT ECONOMIC IMPACTS
PROCUREMENT PRACTICES
ANTI-CORRUPTION
ANTI-COMPETITIVE BEHAVIOR

Environmental Standards

MATERIALS
ENERGY
EMISSIONS
EFFLUENTS AND WASTE
ENVIRONMENTAL COMPLIANCE
SUPPLIER ENVIRONMENTAL ASSESSMENT

Social Standards

EMPLOYMENT
LABOR/MANAGEMENT RELATIONSHIPS
OCCUPATIONAL HEALTH AND SAFETY
TRAINING AND EDUCATION
DIVERSITY AND EQUAL OPPORTUNITY
NON-DISCRIMINATION
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING
LOCAL COMMUNITIES
SUPPLIER SOCIAL ASSESSMENT
CUSTOMER HEALTH AND SAFETY
MARKETING AND LABELING
CUSTOMER PRIVACY
SOCIOECONOMIC COMPLIANCE

A third party independent from the company audited all contents required by Law 11/2018, of December 28, included in this sustainability report. However, the company's management decided not to audit the contents related to GRI Standards (Global Reporting Initiative).

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GRI 102: GENERAL DISCLOSURES (2016)

Code	Topic	Page
102-1	Name of the organization	7
102-2	Activities, brands, products, and services	16, 22, 25, 28
102-3	Location of headquarters	14
102-4	Locations of operations	14
102-5	Ownership and legal form	7, 9, 129
102-6	Markets served	15
102-7	Scale of the organization	14 , 16, 20, 25, 28, 41
102-8	Information on employees and other workers	41
102-9	Supply Chain	16, 38
102-10	Significant changes to the organization and its supply chain	130
102-11	Precautionary Principle or approach	92, 113
102-12	External initiatives	113
102-13	Membership of associations	122
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GRI 102: GENERAL DISCLOSURES (2016)

Code	Topic	Page
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102-16	Values, principles, standards and norms of behavior	21, 50, 71, 73, 92, 118, 119
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102-30	Effectiveness of risk management processes	113
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102-46	Defining report content and topic boundaries	129
102-47	List of material topics	131
102-48	Re-statement of information	73, 78, 96, 106
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102-50	Reporting period	129
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GRI 102: GENERAL DISCLOSURES (2016)

Code	Topic	Page
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102-53	Contact point for questions regarding the report	129
102-54	Claims of reporting in accordance with the GRI Standards	129
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GRI 103: APPROACH TO MANAGEMENT (2016)

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103-2	The management approach and its components	See following tables
103-3	Evaluation of the management approach	See following tables

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GRI 203: DIRECT ECONOMIC IMPACT (2016)		
103	Management approach 203	125, 126
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GRI 204: PROCUREMENT PRACTICES (2016)		
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GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT (2016)		
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416-1	Assessment of the health and safety impacts of product and service categories	114
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49. This report includes no information on measures for consumer health and safety or complaint procedures at their disposal based on the fact that Aciturri's clients are not the end consumer.

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Red Española

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WORK-LIFE BALANCE

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WASTE

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APPENDIX I. AUDIT REPORT

ALESTIS



Alestis's business model is responsible, capable of inspiring trust in customers, investors, employees, partners, and society as a whole.

ALESTIS

The entities included in this report are Alestis Aerospace, S.L., based in Spain, and the affiliated company Alestis do Brasil, Industria Aerospacial Ltda., located in Brazil. The term “Alestis” refers to both firms, unless otherwise specified.

Since July 30, 2019, 75.95% of the shares of Alestis Aerospace, S.L. belong to Aciturri Aeronáutica, S.L.U. The Sociedad Estatal de Participaciones Industriales (SEPI) is a Spanish state holding company that owns the remaining 24.05% of the registered capital of Alestis. Thus, Alestis Aerospace, S.L. is part of Aciturri.

Alestis doesn’t issue its own consolidated financial statements, which are included in those of Aciturri Aeronáutica, S.L.U.

Alestis— leader in composite materials engineering and manufacturing technologies—is a Tier 1 supplier for the main OEMs (Original Equipment Manufacturer) worldwide in the aeronautical industry. Its core business focuses on manufacturing composite aerostructures and carrying out engineering, design, developing, manufacturing, and product support projects for complex aerostructures.

Alestis’s business model is responsible, capable of inspiring trust in customers, investors, investors, employees, partners, and society as a whole.

We have annual operational plans, approved and followed by the Board of Directors with a three/five-year period in mind, as well as the firm’s strategic objectives, which constitute our annual priorities and are based on cash generation, economic profitability, and the fulfillment of our mission and vision. For that we rely on our values to continue pursuing excellence, digitization, and the development and commitment of our employees.

Monitored and backed up by the General Management, each member of the Steering Committee is responsible for attaining the strategic objectives in their specific areas of action, focusing especially on the management of the different production plants, which represent the basis of all their operations.

Our effective and stable compliance system, based on the Code of Ethics (aka Alestis Code) and developed through conduct procedures related to issues such as crime prevention, conflicts of interest, giving and receiving gifts, or training, strengthens our business model. The Alestis Code contains the lines of action followed by all the people who make up the company, and that govern their internal and external relations with the different stakeholders. It is the reference and support guide for the daily decision-making. This document is based on the balance between the results and the way they are achieved and gives the same importance to both factors. It applies to all members of the organization, regardless of their location or role.

STRATEGIC GOALS FOR THE 2022- 2026 PERIOD [51]

TO INCREASE THE COMPANY’S TURNOVER

To increase the company’s turnover to €200M [approx. $208M] in the next few years, preferably through full life cycle aerostructures and diversification of customers and activities

EBITDA

To consolidate a sustainable EBITDA around 15% on sales

INVESTMENTS

To make net investments in R&D&I activities worth €18M [approx. $18.7M] between 2022 and 2026

51. These strategic objectives are consistent with the 2020 feasibility plan.

Alestis has a management program certified under the **ISO 9001, EN9100 POA Part-21G and OAM Part-145, as well as the following certified processes:**

NADCAP CHEMICAL PROCESS	Alestis do Brasil, Vitoria, Sevilla, Puerto Real y Tecnobahía.
NADCAP COMPOSITES	Alestis do Brasil, Sevilla y Tecnobahía.
NADCAP NON DESTRUCTIVE	Alestis do Brasil, Vitoria, Sevilla y Tecnobahía.
NADCAP HEAT TREATMENT	Vitoria.
NADCAP WELDING	Vitoria.
NADCAP MEASUREMENT & INSPECTION	Vitoria, Sevilla.
NADCAP AERO STRUCTURE ASSEMBLY ASA	Vitoria, Sevilla, Puerto Real y Tecnobahía.

In addition, there are over 550 certifications for each client's specific processes.

It should be noted that, in 2021, Alestis was the company with the most Nadcap certifications worldwide. By the end of 2021, we held eight 24-month merits and six 18-month merits, out of a total of 21 processes (including the four new Nadcap ASA). These merits are granted by the agency based on the good results accumulated in the regular audits. They allow to decrease the frequency from the fixed 12-month period to 18 or 24, depending on the assessments.

Also in 2021, our operations diversification process within the aeronautical maintenance area began, which is why the certification was managed according to regulation EN9110: Quality Management Systems - Requirements for Aviation Maintenance Organizations, as well as Part-145 as a Maintenance Organization Approval recognized by the Spanish Aviation Safety Authority.

Since 2021, Alestis has been part of the Defense Companies Registry, a necessary requirement to begin the procedures for obtaining the PERAM 145 certification, the military counterpart to the already achieved Part-145, which is expected throughout 2022.

As an example of the company's involvement and concern in air safety issues, in 2021 we worked on the revision of the previous Quality Assurance Policy, whose scope was expanded through a new **Quality and Operational Safety Policy,** already approved when this document was published.

The implementation of the **Safety Management System (SMS)** also began, which is why Alestis, a pioneer company in Spain within the framework of approved Part 21G organizations, has been praised by the Spanish Aviation Safety Agency.

Since December 2019, Alestis adheres to the **Manifiesto por la innovación en España,** a manifesto for innovation promoted by the Asociación para el Progreso de la Dirección (association for the advancement of management). Its goal is to promote innovation urgently within an inclusive and sustainable environment as an engine of competitiveness in Spain.

In 2021 Alestis has begun the process of diversifying its activity within the aeronautical maintenance area.

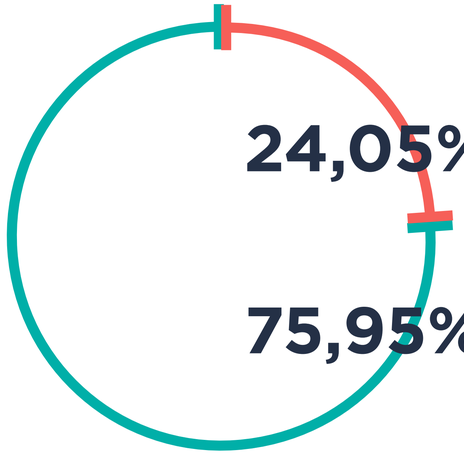
ALESTIS

REPRESENTATIVE BODIES

The Board of Directors of Alestis is firmly committed to strengthening a business activity based on values, principles, criteria and attitudes that favor the creation of value for its partners.



Alestis' Board of Directors is made up of seven members appointed by the partners.



24,05% **SEPI**
SPANISH GOVERNMENT

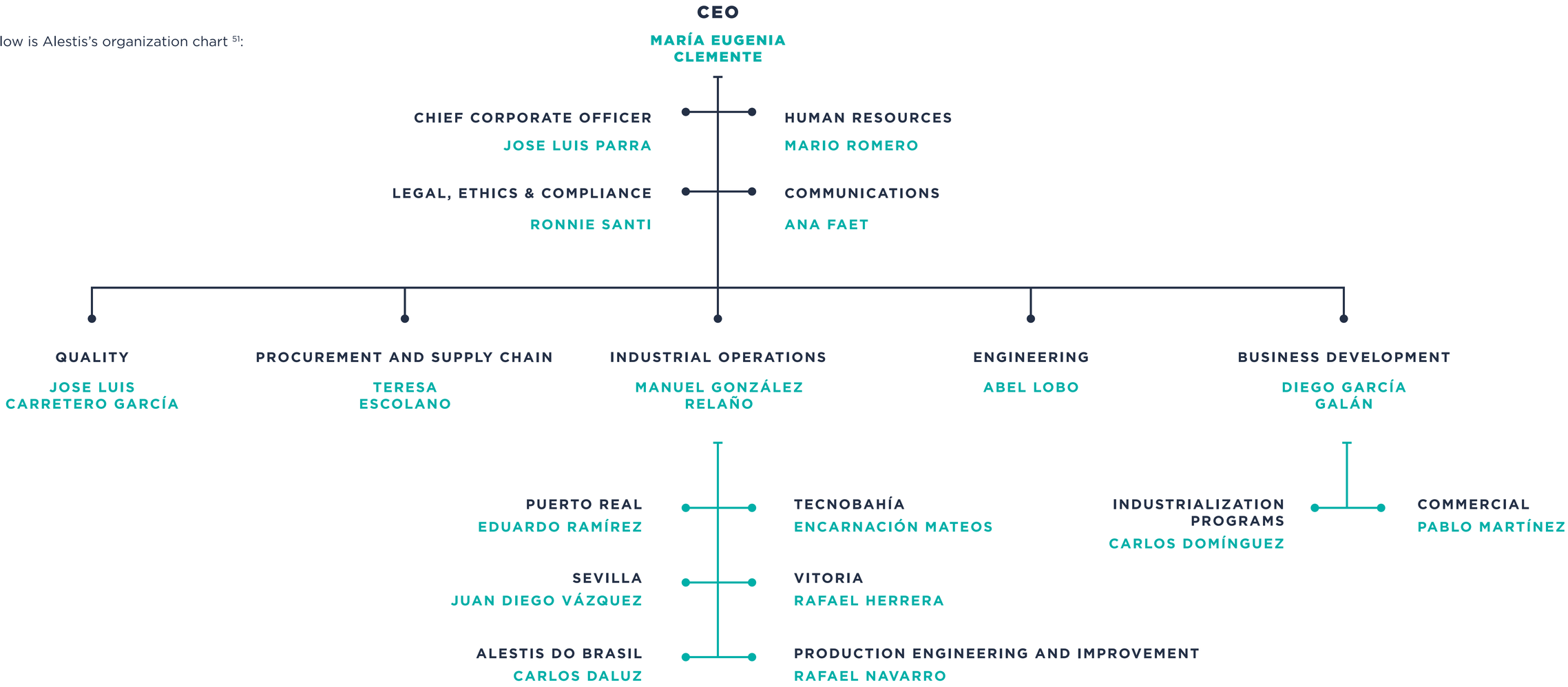
- MANUEL ALVES TORRES
- MERCEDES LIZANA CALVO

75,95% **ACITURRI**

- SEBASTIÁN ARIAS TOBALINA
- ROBERTO REY PERALES
- FELIPE GALÁN GARCÍA
- JAVIER GONZÁLEZ DE LARA Y SARRIA
- RAFAEL BARBERO

Alestis's Governing Body consists of a six-member Board of Directors appointed by the partners and highly committed to strengthening a business activity based on values, principles, criteria, and attitudes that create value for their partners and promote the well-being of their employees, the excellent service provided to their clients, the compliance with the laws, and the ethical commitment to society in general.

Below is Alestis's organization chart [51]:



51. As of the date of completion of this report.

ALESTIS

MISSION, VISION & VALUES

MISSION

"WE PROVIDE COMPREHENSIVE AND INNOVATIVE SOLUTIONS IN THE AEROSTRUCTURES MARKET, GENERATING ADDED VALUE TO OUR CUSTOMERS THROUGH THE TALENT OF OUR TEAM AND THE DOMAIN OF ADVANCED TECHNOLOGIES."

VISION

"TO BE STRATEGIC PARTNERS OF THE MAIN AEROSPACE MANUFACTURERS AND RECOGNIZED AS A SUSTAINABLE AND RESPONSIBLE COMPANY."

VALUES

COMMITMENT

"OUR SUCCESS IS THE RESULT OF OUR COMMITMENT."

We do our best to reach our goals.

ENTHUSIASM

"IT IS THE ATTITUDE WITH WHICH WE FACE CHALLENGES."

We put our heart in what we do, we are a company with its own personality, our motivation and enthusiasm makes us unique.

EXCELLENCE

"EXCELLENCE IS THE ENGINE THAT DRIVES US."

Our ability to overcome drives us to challenge ourselves each day to obtain outstanding results as a team.

VALUE CREATION

"WE FOCUS OUR PERFORMANCE ON THE PROFITABILITY OF THE COMPANY."

We are focused on value creation for our clients, employees and shareholders as a guarantee of sustainability.

INNOVATION

"WE INNOVATE, BUILDING THE FUTURE."

We combine creativity and technological knowledge to generate value, offering remarkable and advanced solutions.

RESPONSIBILITY

"RESPONSIBILITY, OUR WAY OF ACTING."

Aware of the impact of our actions, we develop activities that strengthen the sustainability of the Company and the environment.

ALESTIS

WE ARE HERE

Alestis is headquartered in Spain. The Company has 5 production plants, one of them in Brazil.



ALESTIS

WE ARE HERE

Alestis is a Spanish limited liability company based in Spain, the country where most of its operations take place. However, it also operates in Brasil, through the company Alestis do Brasil, which is included in its consolidated financial statements.





ALESTIS DO BRASIL

Av. Brigadeiro Faria Lima, 1.699 – Jardim da Granja, São José dos Campos
SP,12227-010, Brasil





ÁLAVA

Parque Tecnológico de Álava
C/ Marie Curie 2, 01510 Miñano (Álava)

SEVILLA

Carretera N-339, km 1,5 (C/ Barriada del avión),
41300, La Rinconada (Sevilla)

GETAFE (MADRID)

Pq. Empresarial La Carpetanía, C/ Miguel Faraday, Edificio Charmex
28906 Getafe (Madrid)

TECNOBAHÍA

Parque Tecnológico Tecnobahía,
Avda. Sindicalista Isidoro Gálvez s/n Parcela 39-40-41,
11500 Puerto de Santa María (Cádiz)

PUERTO REAL

Polígono Industrial Trocadero,
C/ Portugal s/n.
11510 Puerto Real (Cádiz)

ALESTIS

KEY CUSTOMERS & PRODUCTS

Alestis provides comprehensive solutions for the aerostructures market, backed by its expertise in advanced composite manufacturing technologies and promoting innovation as a key factor for competitiveness.



ALESTIS

KEY CUSTOMERS & PRODUCTS

Alestis has consolidated its commercial activity with a product strategy that maximizes the value proposition for current and potential customers in the commercial aviation, military and business jet markets.

Alestis is an integrated aerostructures supplier for the different phases of the product life cycle, for OEMs (Airbus, Embraer, Boeing, Dassault Aviation, Calidus), and large Tier 1 companies. We offer capabilities and competencies, design, development, certification, manufacturing, assembly, delivery, final assembly line (FAL), and service support in a competitive and long-term way. Our strategy is based on continuous improvement and investment in research, development and constant innovation, through which we develop optimization projects, improve designs and processes, and reduce costs.

In addition, Alestis can support clients around the world with their offset management.

Our activity focuses mainly on the design, development, manufacturing, and assembly of aerostructures. Alestis specializes in composite manufacturing, providing all the technologies on the market to offer the most competitive solution:

At Alestis, we expanded the business operation we have developed in the last few years by focusing on a product strategy that maximizes the value proposition for current and potential clients in the commercial aviation, military, and business jets markets. We offered them integrated product developments and innovative solutions based on the company's experience and know-how. In 2021, Dassault Aviation became a composite structures partner in the components for the business aviation sector portfolio. Specifically, they were awarded two contracts for the complete cycle (from design to service support) of the rear end and the landing gear doors for the Falcon 10X. Also, Alestis's participation in Airbus programs was completed with the award of the HTP A220 contract, a single-aisle model with a capacity for 100-150 passengers, which currently has a backlog of over 500 aircraft.

In 2021, we signed an agreement with Calidus Aerospace, an OEM from the United Arab Emirates, to supply them with the structure of their B250 counter-insurgency aircraft, which allowed us to start diversifying into the defense market.

The Customer Support & Services division has extensive experience in support activities: at the FAL in Toulouse for the A350 XWB program; at Saint Nazaire for A350 XWB/A330; at the FAL in Sevilla and the Maestranza Aérea de Sevilla for A400M; at the A330MRTT conversion in Getafe; and at the FAL in Embraer in São José dos Campos (Brazil).

In 2021, our activity focused on the commercial development of MRO, Services and Training activities, with both civilian and military clients, which led to the EASA certifications Part-145 as an approved aeronautical maintenance company, and EN9110 as a certified aeronautical maintenance management company.

With regard to international MRO (aeronautical maintenance), in the last quarter of the year we entered into a commercial agreement for the support of major maintenance of the German Air Force A400M aircraft at our client Airbus Defense & Space's operations base in Manching, Germany.

Alestis offers the highest levels of credibility and reliability in the delivery of its products and services. Alestis promotes excellence as a way of working and innovation as a key factor of competitiveness.

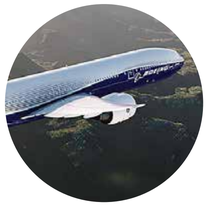
In addition to these, two new programs were added to the Alestis product portfolio in 2021: mass deliveries of the 93 S19-1 A350 XWB rib frames for Aciturri, and the A400M Wing Fuselage Fairing (WFF).

The new contracts signed in 2021 open deliveries of components to Bordeaux (France), Abu Dhabi (UAE), and Foggia (Italy).



AIRBUS

- **BF A350 XWB:** 51 aircrafts.
- **S19.1 A350 XWB:** 52 aircrafts.
- **HTP A320:** 232 aircrafts.
- **PAX DOORS A330:** 20 aircrafts.
- **HTP A330 Parts:** 20 aircrafts.
- **A380:** Belly Fairing 4 aircrafts affected by modifications.



BOEING

- **Flaperon B777 COM:** 22 aircrafts.
- **Flaperon B777 Skin:** 22 aircrafts.
- **Tips & Strakelets B787:** 28 aircrafts.



EMBRAER

- **WING & EMPENNAGE LEGACY 450/500 /PRAETOR:** 44 aircrafts.
- **COMPOSITES PARTS LEGACY 450/500/PRAETOR:** 25 aircrafts.



AIRBUS DEFENCE & SPACE

- **EMPENNAGE C295:** 5 units - transferred to Aciturri in April 2021.
- **FUSELAGE C295:** 9 units.
- **COWLINGS A400M:** 9 units.
- **ELEVATOR A400M:** 6 units.

ALESTIS

PROJECTS

Alestis implements new design concepts and develops new materials and manufacturing technologies that allow us to meet our objectives in both current and future products.



ALESTIS

PROJECTS

PROJECT FOR CONTINUOUS IMPROVEMENT

In 2021, Alestis launched a multi-action long-term Lean Manufacturing project in order to promote the company's culture of continuous improvement, with a special emphasis on production equipment.

During the first phase, developed in 2021, an ambitious training and coaching program was offered to the leaders of the more than 70 natural work teams identified in the organization, to create mature teams capable of performing their duties with complete autonomy and lead the improvement process from the heart of the team.

The methodology used to achieve this personal development toward efficiency relied on the use of two key tools in daily management: the "Kaizen Diario" Panel, and the Gemba Walk Panel.

R&D&I PROJECTS

SOFIA PROJECT

Within the Clean Sky 2 program, we find the SOFIA project ("test methods for analySis OF Infusion Panels"), focused on studying the behavior of thermoset (stiffened) panel manufactured by infusion versus conventional fuselages manufactured with prepeg thermoplastic. Throughout the year, the necessary calculation analyses for the definition of level 2 and 3 tests were completed, which allowed the closure of the L2 test plan for the characterization of the design's key details by means of test pieces. As the leader of the consortium, ALESTIS contributed significantly to the establishment of SOFIA's governing bodies.

DALI PROJECT

As part of the of the aeronautical product diversification strategy, the DALI project, which stands for "development of light aeronautical sections under high energy impact", consists in the development of a composite highly-integrated fuselage section capable of absorbing high-energy impacts. After encouraging tests by the first demonstrators, in 2021, we continued with the analysis of results and characterization of the design.

DOMAIN PROJECT

As part of our strategy for aeronautical sector diversification, we launched DOMAIN: "design and development of complex geometries in aeronautical multifunctional materials integrated into regional segments and business jets". This project focuses on developing a range of highly standardized products which enable us to compete through the creation of scale economies and centers of excellence for manufacturing valid components for all segments.

In 2021, we made good progress in the preliminary design phase to meet the requirements, with intense characterization of the materials to be used, both in sandwich and monolithic structures.

INTEGRATED REAR END

This project is part of our excellence strategy for rear end manufacturing and focuses on the development of an innovative rear end concept based on a structure which integrates all the structural elements through a single one-shot manufacturing process. This concept translates into a significant cost reduction by drastically reducing individual component manufacturing and assembly using the conventional riveting joining processes.

In 2021, technological demonstrators and the launch of integration tools were initiated. Work was also carried out for the continuation of the aeronautical technological plan through the AERCOST project. This project also includes the study of high camber components using membrane and press forming technologies, as well as the fire and temperature resistance of different materials.

INTEGRATED VENTRAL FARING

Within the ventral fairing excellence strategy, we are studying highly integrated designs that allow a significant reduction in weight and assembly time at the final stages of assembly by means of robust and highly automated processes.
In 2021, we also did the necessary work to ensure the continuation of the aeronautical technological plan through the AERCOST project. Following the successes achieved by our development of sandwich panels using automated lay-up to reach TRL6 level maturity, this project aims to explore new sandwich materials and configurations to become more competitive cost- and weight-wise. In addition, modular and high integration design concepts were developed to allow a very high cadence in the subsequent stages of assembly.
This year, all these concepts were developed, establishing a portfolio of potential optimal configurations, as well as technological demonstrators applied to the design of sandwich panels with complex geometries.

HYDROGEN TANKS

As part of the diversification strategy, in 2021 we launched a study of compressed hydrogen storage solutions for use in combination with fuel cells in transport elements or for large-scale storage. During the first phase, we would like to obtain type IV compressed hydrogen tanks at 350 bar of different sizes.

In 2021, we made progress with the conceptual and detail design phases through calculation, design, and simulation with specific tools for this purpose. In addition, we developed and manufactured the necessary accessories and tools. Finally, we completed the manufacturing of the first technological demonstrators using filament winding technology applied to tanks for transportation use.





DIGITIZATION PROJECTS

Improving operational efficiency through process digitization and the potential for proper data management is one of Alestis's strategies to achieve excellence.

In 2021, Alestis completed the implementation of Polaris, a platform that integrates proximity technologies and big data to make operators' daily activity easier, and its paperless system. This involves fully eliminating paper and completely digitizing information in all the products of Tecnobahía and Alestis Sevilla assembly lines; in Puerto Real, the implementation was completed in the A320 HTP assembly.

The implementation of Polaris allows the operator to automatically access the SAP system by means of their Beacon card and tablets at the workstations so they can check the tasks they are expected to perform according to their role. This system allows us to fully understand the line traceability in real time, manage the production flows progress more efficiently, and reduce our paper consumption.

To speed up the preparation of information based on our income statement by program/facility, a suite of tools on financial flows and operations was implemented to facilitate the classification of financial and accounting information by program via the generated reports.

The following digitization projects were also developed in the following areas:

LOGISTIC SCOPE

NO SAP: an application to monitor and communicate with suppliers about order receipt issues that prevent them from entering the SAP system.

Reception: enhancements to the receiving process implemented in SAP to eliminate admin work and errors.

Auxiliares: an application that orders the re-stocking flow of auxiliary material in the workshop and cuts down on journeys. It is connected to SAP to monitor the consumption of materials via bar codes or QR codes.

Product Data Management (PDM): the Design Engineering Department developed an internal software for Product Data Management to guarantee the continuity of the information generated in 3DEXPERIENCE by the Design Department for the rest of the company's divisions, where CATIA v5 is widely used.

Análisis Part History ATL: an application that allows us to obtain a record of activity and errors detected in ATL/AFP (Automated Tape Lay-up/Automated Fiber Placement) through real-time monitoring of machine actions.

Digital Picking: we developed a software internally that connects SAP, Modula and Polaris using the tablet and a bar code scanner. The production order is selected on the tablet and Modula automatically supplies the required parts. The scanner registers the parts removed from stock and their consumption in SAP. Finally, the parts are included in the cart and the work in the warehouse is completed. The full cart goes to production control from where it is sent to Polaris.

Dispatch management: tablet-based application that optimizes the picking process. Connected to SAP, it inputs the bundles to be issued to the customer in their corresponding delivery slips. It also helps verify the dispatch before sending it with a very agile process by means of a bar code scanner.

Chemical management: chemical materials control interface connected to SAP that allows visualization of the materials expiration dates and mixing process. Consumption in SAP is done via bar codes and requires no admin work.

INDUSTRIAL SCOPE

Digiops—Alestis Ops Scanner Tool, v. 2.0.: this project was launched in 2020. In 2021, we released version 2.0, which implemented improvements in terms of security , verification process, and the connection of the application with SAP.

Fiber consumption and adjustment automation: an application which allows us to automate the process of calculation and adjustment of material consumption in the automatic lay-up machines via bar code scanning of the cards associated with each fiber reel. Once scanned, the data is automatically entered into the system and the lay-up process begins.

Fabric cutting management (CT app): it helps sort the elements from the Lectra machine, while offering a simple solution to visually identify missing patterns or unreadable labels.

Part identification:
Two embedded label identification printers were installed in Tecnobahía and Alestis Sevilla. This was previously done by hand, but now, thanks to the data from SAP, a label that cures with the product is printed; it includes a bar code and eliminates any errors caused by the manual process.

White ink identification machine in Tecnobahía: by scanning the ID code for the production command, the code is printed directly on the part using the data from SAP.

Lay Up Digital Book: integration with the 3D model to automatically create the lay-up book with sketches data and anti-FOD (Foreign Object Damage) check.

PNS SAP build from 3D: this project helps automate the creation and update of part numbers in the SAP system from the aerostructures 3D models. This automation makes it possible to eliminate most errors resulting from manual actions.

Sealants: application that generates sealant registration, QR sticker printing and data integration in the product traceability by scanning a QR code.

FUNCTIONAL SCOPE

HOLIDAY AA.PP. APP: 100% of the staff has now access to this web application, from which they can manage their holidays and days off.

CRPP: an analytical report within the SAP system that enables us to visualize the accounts with all logistic movements from an operational point of view.

The Systems Department carried out different projects to improve the remote work environment as well as the information and data management system between the plants. The migration to Office 365 was completed, creating a collaborative Microsoft environment for instant meetings whether on site or at home. This project also involved migrating the internal mail to the cloud, increasing our mailbox space. In collaboration with Aciturri, we launched the project CALOR, creating a single point to manage processes for the two companies.

A Distributed File System (DFS), a server network component, was implemented to facilitate data handling on the network between all plants. Finally, we launched Seguridad IT, an event management system that identifies and minimizes potential security threats and vulnerabilitie.



ALESTIS

RESULTS

Alestis has developed a Corporate Action Plan that includes important measures to save and optimize resources due to the health crisis.



ALESTIS

RESULTS

The proposed modification of the creditors' agreement has been approved by Mercantile Court number 2 of Seville with the agreement of 93.40% of the creditors concerned.

In the years leading up to the COVID-19 pandemic, the aeronautical sector had already been showing a certain slowdown. In December 2018, Airbus started slowing down its activity in the major aeronautical programs. At the same time, it began to lower the rates from its main platforms from a certain number of deliveries.

Subsequently, in March 2020, the outbreak of the pandemic generated a global crisis, with a particular impact on the aeronautical sector, which is largely dependent on the movement of people and goods. For this reason, already in 2020 Alestis's structures were adapted to the new plans for deliveries and prices, as communicated by the main clients. This forced us to approve important measures in an attempt to save and optimize resources. These measures were articulated in a corporate action plan based on four main pillars: internalization of workload, reduction of raw material consumption and costs, reduction of other operating expenses, and early cancellation of debt with the application of substantial discounts. We implemented the following actions:

Improvement plan aimed at reducing the company's operating costs, which has already yielded recurring synergies that have enabled us to cut down on costs significantly in 2021.

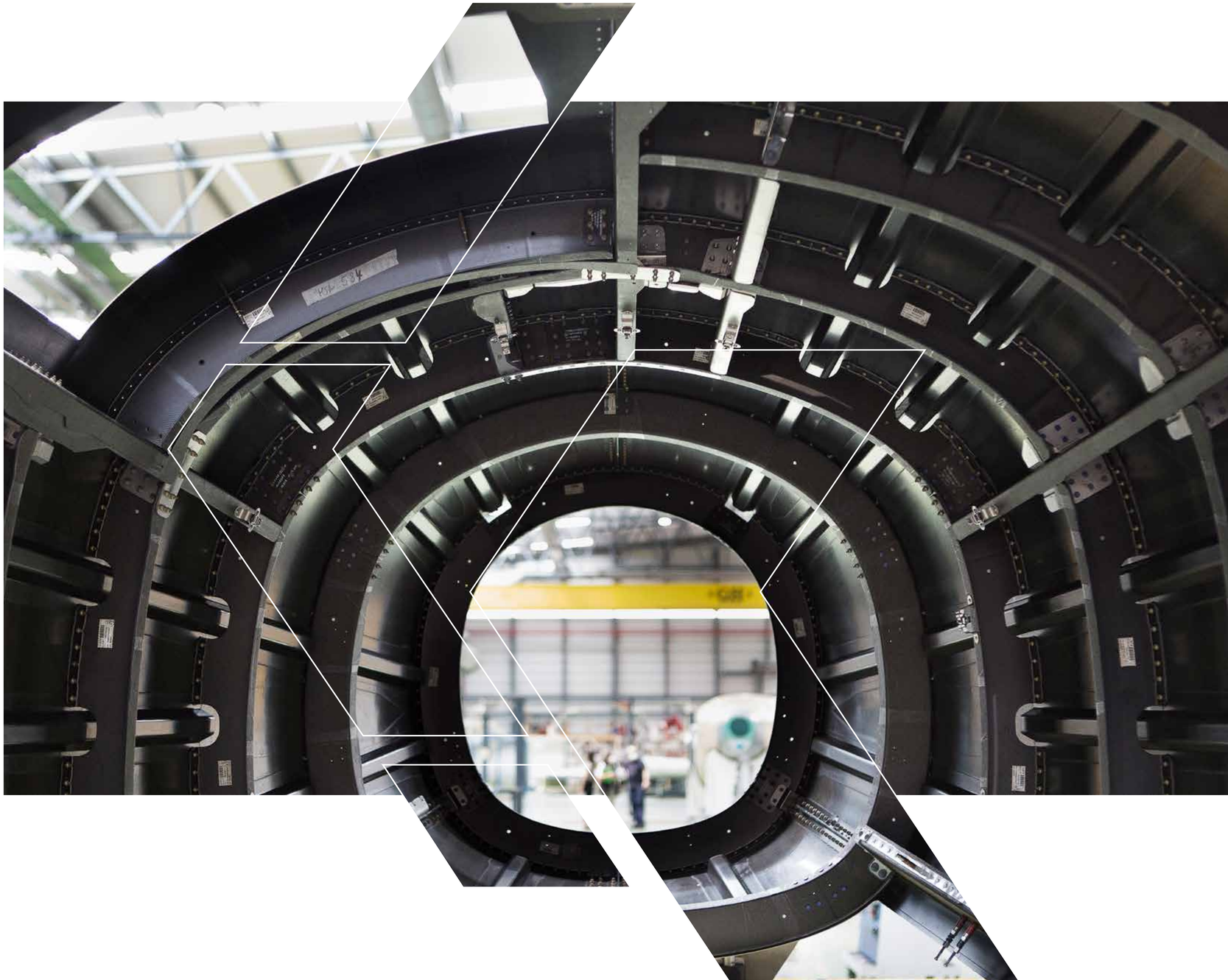
Industrial restructuring to reduce the atomization of our production centers and optimize the use of our own facilities, both for productive activities and office space, instead of resorting to leased buildings. The two plants located in Sevilla were merged into one. The headquarters were moved to the production plant in Sevilla—currently the only one there—, located next to the airport. We also closed the logistics warehouses in Cadiz. Other actions of this nature are expected to be implemented in 2022.

Employment restructuring to adapt our capacity to new medium- and long-term production estimates. A furlough scheme was launched in 2020 for a very significant percentage of our staff, as well as labor force adjustment procedures agreed upon with the union representatives. This also affected a big percentage of the company's staff. This measure has translated in significant savings in personnel operating costs, which have already been obvious in 2021. However, it also had a major negative impact on the 2020 income statement—more than €20M [approx. $20.8M] spent on staff compensation. There is currently a furlough scheme in place until December 31, 2023.

Commercial actions to explore new markets in search of additional workload and to diversify our client and product portfolios.

Agreement to refinance our insolvency debt, in accordance with the legislative authorization provided for in Law 3/2020, of September 18, of procedural and organizational measures to deal with COVID-19 in the field of the Administration of Justice. This law allows us to promote an amendment to the agreement we reached with our suppliers back in 2013, and for that purpose we submitted a proposal to the court at the end of 2020. This proposal to amend the agreement with creditors, which only affects those who were involved in this bankruptcy procedure at the time, was finally approved by Sevilla's Commercial Court number 2, in a ruling from March 25, 2021, with the agreement of 93.40% of the creditors concerned. Based on this modification, the creditors may choose to receive their credit immediately with a 45% haircut, or receive the full amount over the next fifteen years. In other words, this new agreement allowed to reduce the financial debt subject to be scaled down, and rationalized the repayment rate of the deferred debt. It also led to very positive results in 2021—about €39.7M (approx. $41.3M)—2021 thanks to scaling down the debt and extending the time.

The implementation of these plans translated into exceptional costs in 2020 (around €23.4M / approx. $24.6M), but thanks to this, the foundations were laid for a significant improvement in the balance sheet and income statement in 2021, which we expect to maintain and improve in subsequent years. Suffice it to say that net financial debt has been reduced this year by more than €50M and the net result for 2021 amounts to some €34M, which has rebalanced Alestis's financial situation. These results are due not only to the impacts of the new bankruptcy agreement, but also to the operational improvements implemented, which increased the EBITDA by more than 10% on sales for the year despite a 52% reduction in the turnover net revenue when compared to 2019. From a financial standpoint, the balance sheet shows a good performance, with a balance of more than €57M by the end of 2021. We reached a positive cash flow in all operational activities (operating and investment flow) that has been earmarked for payment of financial debt.



In March 2021, we began to roll out the annual objectives, which revealed the major challenge ahead of us—evolving as a company and being competitive, relying on innovation and diversification to grow even more, focusing on the development of our employees' skills, and of course, doing all that while improving profitability. These objectives for 2021 were based on three strategic pillars:



STRONG BOND WITH PEOPLE

To promote the participation and involvement of the staff and to encourage them to hone their skills.



FUTURE GROWTH

To intensify commercial efforts and consolidating the industrial transformation initiated in 2019 and 2020, by relying on advances in innovation, diversification, automation, and digitization of processes.



IMPROVED PROFITABILITY

To boost the company's EBITDA by improving our revolving fund.

The following economic results were achieved in the pursuit of those objectives:

REFERENCE	MILLIONS OF EUROS	
	2021	2020
Net revenue	**138.5**	165.6
EBITDA (EBIT + depreciations/amortizations)	**14.9**	(9.2)
Operational result	**(3.5)**	(27.2)
2021 net results	**33.7**	(31.0)

Despite the fact that the net turnover is 16% lower in 2021 compared to 2020, the economic improvements in 2021 are noticeable through an increased EBITDA and operating income by around €24M when compared to previous year's figures. Also, this year's net result is positive by more than €33M thanks to the financial impacts, e.g. the positive accounting effect of the new bankruptcy agreement, which has generated an estimated profit of €39.7M.

Net income for the year was positive by more than 33 million euros.

Our Brazilian subsidiary, Alestis do Brasil, Industria Aerospacial Ltda., also reached a positive operating result of €1.7M in 2021 (approx. R$11M), although the financial impacts translated into a net negative result of -€0.8M (approx. -R$5.1M). Thanks to the positive evolution of the Brazilian subsidiary, Alestis did not have to show any deterioration in its accounts in 2021 regarding its assets.

In 2021, net sales amounted to €138.5M [approx. $145.8M] (as opposed to €174.3M [approx. $347.5M] in 2020), with the total assets of the company at €277M [approx. $291.7M] (as opposed to €331.2M [approx. $348.8M] in 2020). The total capitalization of the company is €191.28M [approx. $201.4M] (€241.2M [approx. $254M] in 2020): €29.2M [approx. $30.7M] corresponds to net worth, and €162M [approx. $170.6M] to financial debt. In 2020, the breakdown was €1.6M [approx. $1.69M] and €239.5M [approx. $252.2M] for net worth and financial debt respectively.
Below is the turnover by country:

TURNOVER

COUNTRY	TURNOVER (thousands of euros)
GERMANY	2,818
BRAZIL	3,240
CANADA	527
CHINA	169
USA	715
UNITED ARAB EMIRATES	54
SPAIN	61,272
FRANCE	68,553
PORTUGAL	1,141
UNITED KINGDOM	17

Total turnover of 138,506 thousand euros.

Alestis belongs to the Corporate Income Tax group, as it is being of the tax group led by Govera Inversiones, S.L. Due to our negative balance, we didn't pay anything to the Spanish Tax Authorities on account of the Corporate Income Tax in 2021. What is more, we are an estimated €0.3M in credit, which will be repaid to us in 2022. Likewise, our Brazilian affiliated company did not pay anything under income taxes.

In 2021, Alestis received public capital from the European Union for the SOFIA project, included in the European Clean Sky 2 program, amounting to €119,600.

Net financial debt has been reduced in 2021 by **53.9 million** euros.

The main data from a financial point of view is as follows:

REFERENCE	MILLIONS OF EUROS	
	2021	**2020**
Cash	**57.1**	80.8
Financial debt	**162.0**	239.6
Net Financial Debt (Financial Debt-Cash)	**104.9**	158.8

As shown in the previous table, our net financial debt was reduced by €53.9M in 2021, achieving a marked improvement in the extent of the company's debt. On the other hand, financial solvency was considerably strengthened based on the fact that only €6.7M from the financial debt are short-term (as opposed to €97M in 2020).

ALESTIS

SUPPLY CHAIN

Alestis has suppliers from all over the world, mainly China, the United States, Brazil, Japan, and the European Union. We receive both materials and services from the main suppliers in the aeronautical sector.



ALESTIS

SUPPLY CHAIN

43.73% of supplier spending goes to suppliers and subcontractors located in Spain (1.44% more than in 2020).

Alestis has suppliers from all over the world, mainly China, the United States, Brazil, Japan, and the European Union. We receive both materials and services from the main suppliers in the aeronautical sector.

43.73% of supplier spending goes to suppliers and subcontractors located in Spain (1.44% more than in 2020).

To manage our relationships with our suppliers, we use the following processes:

PROCUREMENT POLICY AND STRATEGY

It establishes the framework for our relationships with product and service suppliers. This document reflects Alestis's wish to find suppliers who share our ethical values and can prove it. The goal is to consolidate a stable and long-lasting relationship with suppliers and generate value on a sustained basis.
It also includes social and environmental aspects. With regard to human rights, our Purchasing Policy includes the fight against all forced and compulsory labor, harsh or inhuman treatment of workers, the effective abolition of child labor, regularized employment, and non-discrimination practices. As for occupational safety and health conditions, suppliers are required to have a safe and healthy work environment by minimizing risks and taking appropriate preventive measures, as well as by providing their staff with the right PPE.
In the same vein, suppliers and subcontractors must also comply with environmental regulations and waste management, emission treatment, discharges, handling and disposal of chemicals and hazardous materials, etc.
Last but not least, issues of gender diversity and equality are included in the Ethics & Compliance Policy (paragraph 3.3)[52] .

SUPPLIER SELECTION AND RECRUITMENT PROCEDURE

This procedure establishes the qualifying criteria (respect for human rights and basic labor rights, among others), and aspects related to technical capacity, industrial capacity, and deliveries, as well as trade and quality criteria. It also ensures that all purchases are carried out on fair and equitable criteria.

SUPPLIER EVALUATION, APPROVAL, AND ONBOARDING

Which defines the method to be followed for evaluating, approving, onboarding, and checking the quality of suppliers. This is applied to all suppliers of airworthy materials, raw materials, standard and auxiliary services, and those carrying out subcontracted operations that affect the quality of the product, and establishes the criteria to evaluate suppliers, which can be through documentation or through an in-person visit. The on-boarding consists of several stages, which include the preparation by the supplier of a Quality Plan, a Special Adaptation Plan based on the evaluation, or a Set-up Action Plan if deviations are identified.

CONTROL AND MONITORING OF SUPPLIERS

In this case, the goal is to ensure that all suppliers' deliveries meet all the requirements, and confirm that the suppliers themselves adhere to the company's policy and objectives, their industrial process is robust enough, and orders comply with quality standards and are fulfilled in a timely manner. All this is framed by continuous improvement and development, following the expectations and strategies set by Alestis. We analyze the fulfillment of delivery times, quality, annual turnover, load and capacity, risks, and other issues of interest to Alestis.

SUPPLIER STANDARD CONTRACT, INCLUDING ETHICS & COMPLIANCE CLAUSES

All new contracts entered into by Alestis with suppliers have a "Responsibility and Sustainability" clause (included in Alestis's Ethics & Compliance Policy). Suppliers also have to prove their commitment to firm compliance with applicable regulations on human rights, employment, conflicts of interest, code of ethics, compliance with environmental, health and safety regulations. Additionally, they have to agree to not use any of the materials defined as "conflict minerals" in the manufacture of the elements (with the incorporation of the concept of due diligence in their supply chain to ensure this).

EXPORT COMPLIANCE

This procedure aims at identifying the countries where purchasing or subcontracting is not permitted (countries with international sanctions), as well as at knowing what to do if any risks are indeed detected.

2021, a questionnaire was launched to major suppliers to gather information on their various areas of management, including ethics and compliance. Specifically, it included questions regarding human rights (child labor and people smuggling, among others), employment (harassment, non-dis-

52. The Purchasing Policy is included in the document manager, available to all suppliers. In addition, a related clause is now being added to new contracts.

Alestis applies mechanisms to ensure that suppliers comply with basic standards of ethics and respect for human rights, occupational health and safety, the environment and sustainability.

crimination, pay and benefits, and social dialog), conflict of interest, code of ethics, environmental and health and safety compliance, conflict minerals, and the fight against corruption.

The aim is to produce a study to be presented in 2022 on the supply chain as a whole, identifying inclusion or withdrawal from the supplier map for each supplier.

In a nutshell, at Alestis we implement the necessary mechanisms to ensure that suppliers comply with the legislation in force regarding basic ethical standards and respect for human rights, occupational health and safety, the environment, and sustainability.

Every year, the Procurement and Supply Chain Department draws up a **Supplier Audit Plan** which includes the following suppliers: those with a high impact on customers; those defined by our business strategy; those who are high risk; those who exceed the previously established business impact threshold; and those new and old that have not been audited for three years.

In 2021, 23 audits were carried out, both on site and online, depending on COVID-19 restrictions. The outcome was positive, but we do have a few action plans to bring about improvements in the supply chain. The progression of major (Ma) and minor (Mi) non-conformities is shown in the following chart:

AUDIT PROGRESSION

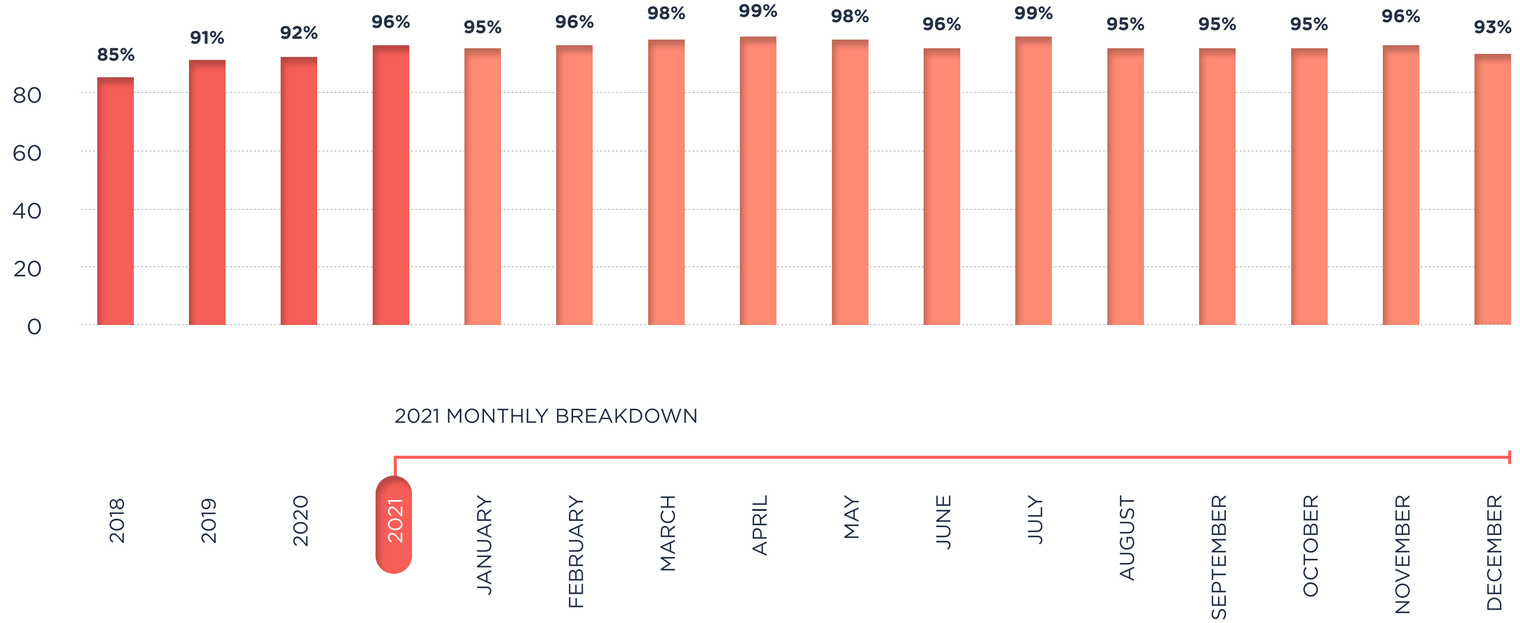


In 2021 there were no industrial audits (IPCA+) in the supply chain given the impossibility of doing them on-site in the suppliers' facilities due to the restrictions derived from the pandemic.

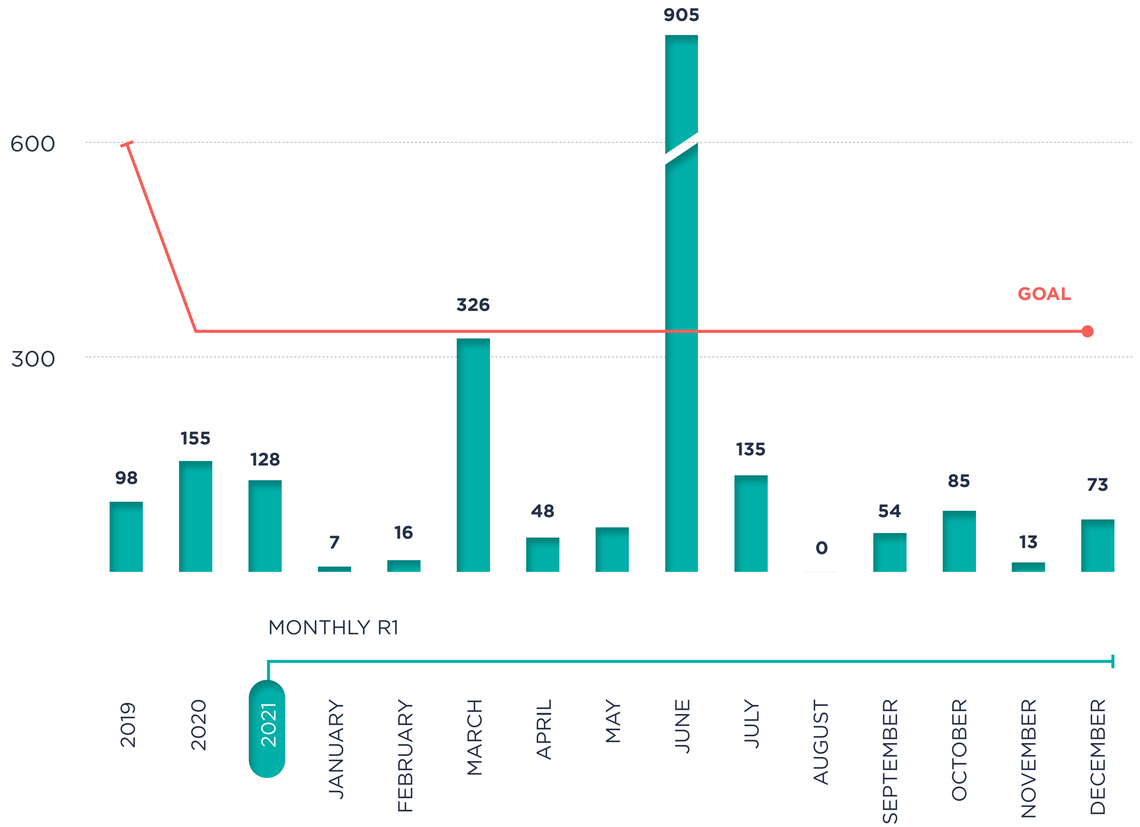
However, we did consolidate the main indicators that demonstrate suppliers' performance: OTD (on-time deliveries) in a one-year period, compared to total deliveries in the same year; and R1, number of non-conformity parts in a one-year period, compared to total deliveries in the same year, per million.

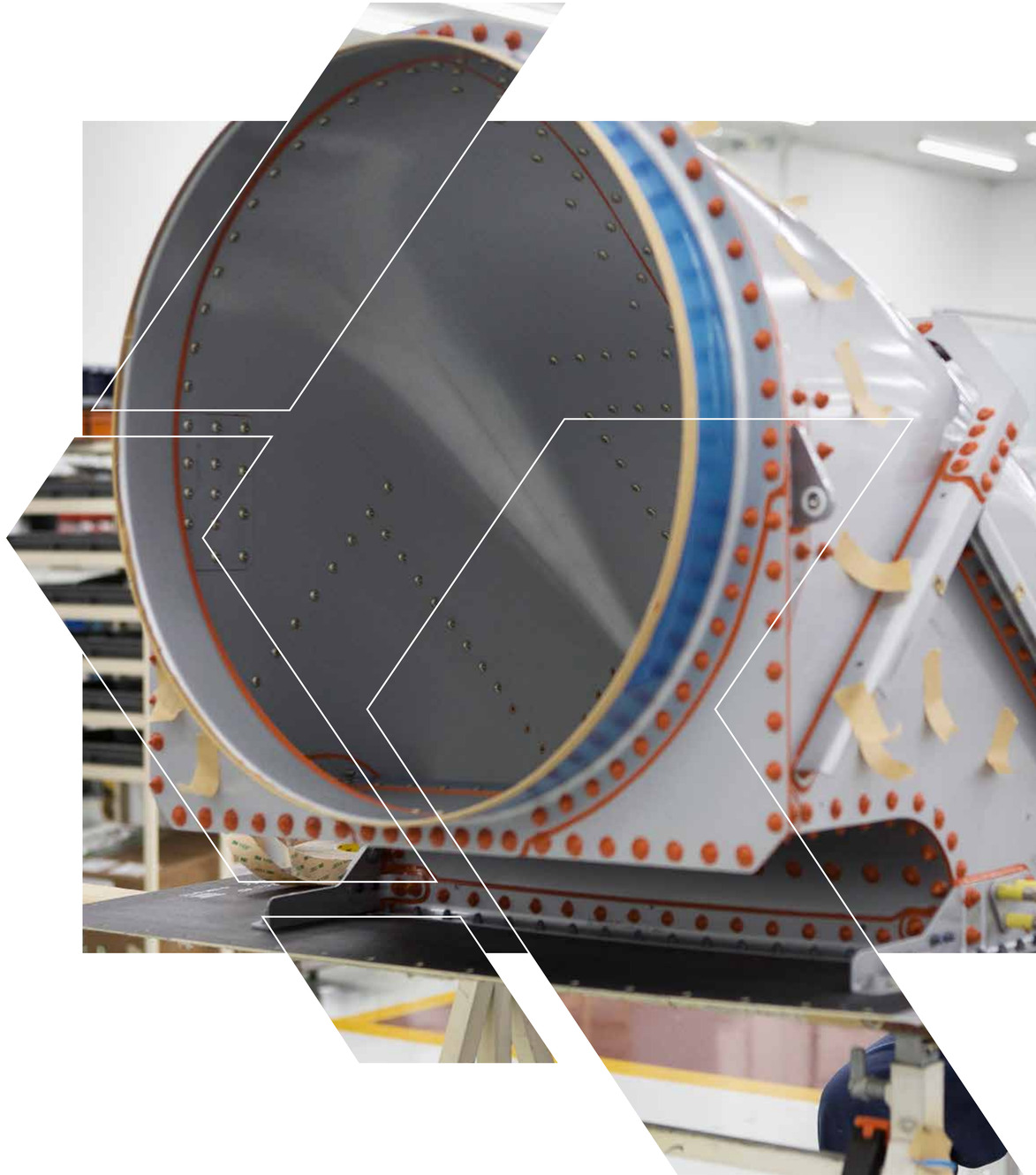
During this year, the main indicators of supplier performance have been consolidated.

ANNUAL DEVELOPMENT OF OTDs



R1 (PPM)


600
300
GOAL
98
155
128
7
16
326
48
905
135
0
54
85
13
73
MONTHLY R1
2019
2020
2021
JANUARY
FEBRUARY
MARCH
APRIL
MAY
JUNE
JULY
AUGUST
SEPTEMBER
OCTOBER
NOVEMBER
DECEMBER



ALESTIS

RISK MANAGEMENT

During 2021, the *Business Continuity Plan* was implemented to extend Alestis' protection against identified risks that may affect business continuity.



ALESTIS

RISK MANAGEMENT

Corporate Management analyzes the factors that could affect the Group's results and adopts the measures it considers necessary at any given time to mitigate them.

Alestis manages its operational risks through the **Advanced Product Quality Planning (APQP) Model,** which has been implemented across the board in the company's operations in accordance with standard EN 9145. Risks during the design phase are identified, assessed and mitigated using the Design Failure Mode and Effect (DFMEA) tool within the Advanced Product Quality Planning (APQP) Mode. Similarly, in the development and mass manufacturing phases, the Failure Mode and Effect Analysis (FMEA) tool is also used.

Corporate Management is responsible for monitoring operational and financial risks on a monthly basis.

Where financial risks are concerned, they are in charge of analyzing the variables that could potentially affect the Group and of taking the necessary measures for its mitigation at any time. More specifically, it adopts the necessary mechanisms to control exposure to changes in interest rates and exchange rates, as well as credit and liquidity risks.



The main financial risks that have an impact on the company are listed below:

CREDIT RISK

Alestis maintains its cash and equivalent liquid assets in financial entities with a high credit rating. Regarding the accounts receivable, it should be noted that the vast majority of the Group's sales are made to companies like the AIRBUS Group, the BOEING Group, and Embraer, all of which have recognized international prestige and solvency.

LIQUIDITY RISK

In order to ensure liquidity and be able to meet all payment commitments, Alestis has sufficient cash. Additionally, for specific cash needs, the company could go obtain non-recourse financing from a financial institution, an operation offered by our main client.

MARKET RISK

(Including interest rate, exchange rate, and other price risks): Alestis's cash and financial debt are exposed to interest rate risk, which could have an adverse effect on financial results and cash flows. However, given the company's sound financial structure, this risk does not seem significant.

EXCHANGE RATE RISK

Alestis operates worldwide and is therefore subject to exchange rate variability; this is true especially for the US dollar, currency in which we make our sales. Exchange rate risk arises from future commercial transactions and recognized assets and liabilities. The company always assesses the need for action in this area by taking into account the net risks, the historical situation of the currencies at issue (usually US dollar), and their foreseeable evolution according to the criteria shared by major financial analysts, among other aspects.

In 2021, we used derivative financial instruments to protect our future activities, operations, and cash flows from the risks they are exposed to. Throughout the year, we signed several FX Forward exchange insurance contracts. At the same time, the safety and compliance, environmental, and occupational risks must be managed, too (see specific sections).

As a result of the high safety and reliability requirements of aeronautical components, quality is part of Alestis's DNA. Because of its impact on our clients' processes, as well as on the safety of the components, the treatment of non-conformities plays a key role in the company's management system.

This non-conformity treatment procedure has two courses of action:

CUSTOMER NON-CONFORMITIES

Which have caused or are causing problems in the assembly lines or during aircraft operation. In these cases, Alestis analyzes and identifies the root cause of the problem, as well as its immediate correction, and implements containment measures to ensure that all products shipped from the moment we are made aware of the incident are compliant. In addition, we put in place prevention plans to ensure that this problem will never happen again either in this component or in similar elements.

In both cases, we analyze the causes with the tools 8D or PPS, and establish containment, corrective, and preventive measures based on the results.

Such non-conformities are monitored until they are resolved. This is part of the usual follow-up with our clients within the contractually agreed deadlines. While the results for 2021 have been higher than in 2020 (30%), they remain below the data for 2019 (13%) and previous years.

In 2021, 100% of claims were resolved, more than 75% of them within the agreed time frame with the client.

In 2021, 100% of claims were resolved, more than 75% of them within the agreed time frame with the client.

INTERNAL NON-CONFORMITIES

Which occur during the productive process and, depending on the type of contract, may or may not require a detailed analysis and description of the repair carried out by the customer or by Alestis. This decision is based on approved and recognized agreements on delegation of responsibility.

The results for 2021 show an improvement of 29% over 2020, with the same downward trend as in previous years.

2021 show an improvement of 29% over 2020.

The company has indicators in place to measure the effectiveness of these processes by controlling and tracking the number of non-conformities. These indicators are part of the industrial management control panel in all our plants and have improvement objectives on a year-by-year basis.

The teams at each center work to improve these indicators by analyzing the problems with management tools that make it easier, sharing experiences, and identifying red flags that may cause problems in the future in order to avoid their recurrence.

Alestis has no direct contact with the end customer; namely, the airlines or the passengers. In the event of any incident, the airline contacts the manufacturer: Alestis's customer.



BUSINESS CONTINUITY PLAN (BCP)

In 2021, a tool was developed and implemented to extend Alestis's protection against risks that may affect business continuity. It is called BCP (Business Continuity Plan) and it is supported by the company's management and clients, who see it as added value and additional security.

The tool allows to identify the condition of different catastrophic phenomena for a given process or program; namely, floods, pandemics, earthquakes, major breakdowns, etc. and analyzes their behavior, which allows to calculate the expected impact in each case.

When applied in general, it allows to identify and categorize the risks according to their level of impact. Then, based on the level of stock in each process, it lets us assess the downtime that would be necessary in each case. From there, we could carry out actions focused on specific weaknesses versus clearly defined risk situations.

The BCP tool is being developed at three levels:



Operations

Production plants: Tecnobahía, Puerto Real, Sevilla y Vitoria[53].



Systems (IT)



Supply chain

53. At the Vitoria plant, the first stage of the tool has already been implemented and managed. The launch and development of the action plan is expected in 2022. The delay in relation to other plants is based on pandemic-related travel restrictions.



Operations

Its progressive implementation has generated multiple actions aimed at minimizing the impact. Specifically:

TECNOBAHÍA

- Ensure availability of qualified personnel.
- Improve fire protection (detection, protection, collaboration agreements, etc.).
- Drain cleaning.
- Protection of water supply.
- Protection of specific programs (software).
- Operating system upgrade.

PUERTO REAL

- Fire hazard for paint equipment and warehouses: installation of water sprinklers and an emergency shut-off valve in the gas supply.
- Fire hazard for offices and shop floor: creation of a sandwich panel firewall
- Increased risk of power failure (transformer): installation of a spare transformer and switchboard.
- Fire hazard for transformers and electrical distribution switchboard: CO_2 gas protection system.

SEVILLA

- Installation of a fourth spare air conditioning unit in each chamber.
- New warehouse.
- Purchase of new spare air conditioning units for each clean room and adaptation of existing installation.
- Acquisition of new machines due to obsolescence.
- Purchase of new spare automated guided vehicle (AGV).
- Individualized installation of control room in autoclaves.
- Acquisition of new CNC machine.
- Purchase of new spare ultrasound machine (ongoing).
- Corporate project to homogenize cyberattacks in plant/company machines.



System Management

TECNOBAHÍA

- Investment in the necessary service infrastructure and contracting.
- Installation of the new platform (the current one is obsolete).



Supply Chain

TECNOBAHÍA

- Specified parts: development of different alternative suppliers.
- CFRP materials + metallic raw material: safety margin extension, monitoring, and client involvement.
- Hardware: development of new contracts with new purchasing/planning parameters Building the “spot” supplier network.
- Cores: fire risk audit update.
- Carbon Fiber parts: feasibility analysis internalization.
- Sheet metal parts: transfer of work and analysis of alternative suppliers.
- Tubes: transfer of work and analysis of alternative suppliers.

These actions are monitored periodically by the associated leader for each management unit and the specific manager for each plant or function.

These actions are monitored periodically (three annual meetings) by the associated leader for each management unit (plants, systems, and supply chain), and the specific manager for each plant or function. In addition, a fortnightly follow-up is carried out in each management unit at operational level, where detailed work is undertaken to make progress with each defined action.

Alestis do Brasil in its role as manufacturer/supplier of composite key parts contributes to a safety operation by complying with the product requirements (standards, drawings, etc.) as well as these procedures:

APQP
ADVANCED PRODUCT QUALITY PLANNING

SE8204
FIRST ARTICLE INSPECTION (FAI)

SE8501
DATA ANALYSIS AND IDENTIFICATION OF IMPROVEMENT MEASURES

STAFF [54]

Alestis is a company that prioritizes talent and is committed to diversity, all in an environment that respects work-life balance.

People are the company's most important asset, this is why, in order to meet our goals, we prioritize our employees' development and make sure they are happy.

We are aware of the importance work-life balance. That's why we promote measures to facilitate it by establishing specific actions in our Family Responsible Company Policy (EFR in Spanish).



54. All data reported are from 12/31/2021, unless otherwise specified.

Alestis's staff is made up of 1,040 employees: 825 men and 215 women, based in the different plants in Spain and Brazil:

1. ALESTIS PUERTO REAL (CÁDIZ)
261 PEOPLE

2. ALESTIS TECNOBAHÍA (CÁDIZ)
96 PEOPLE

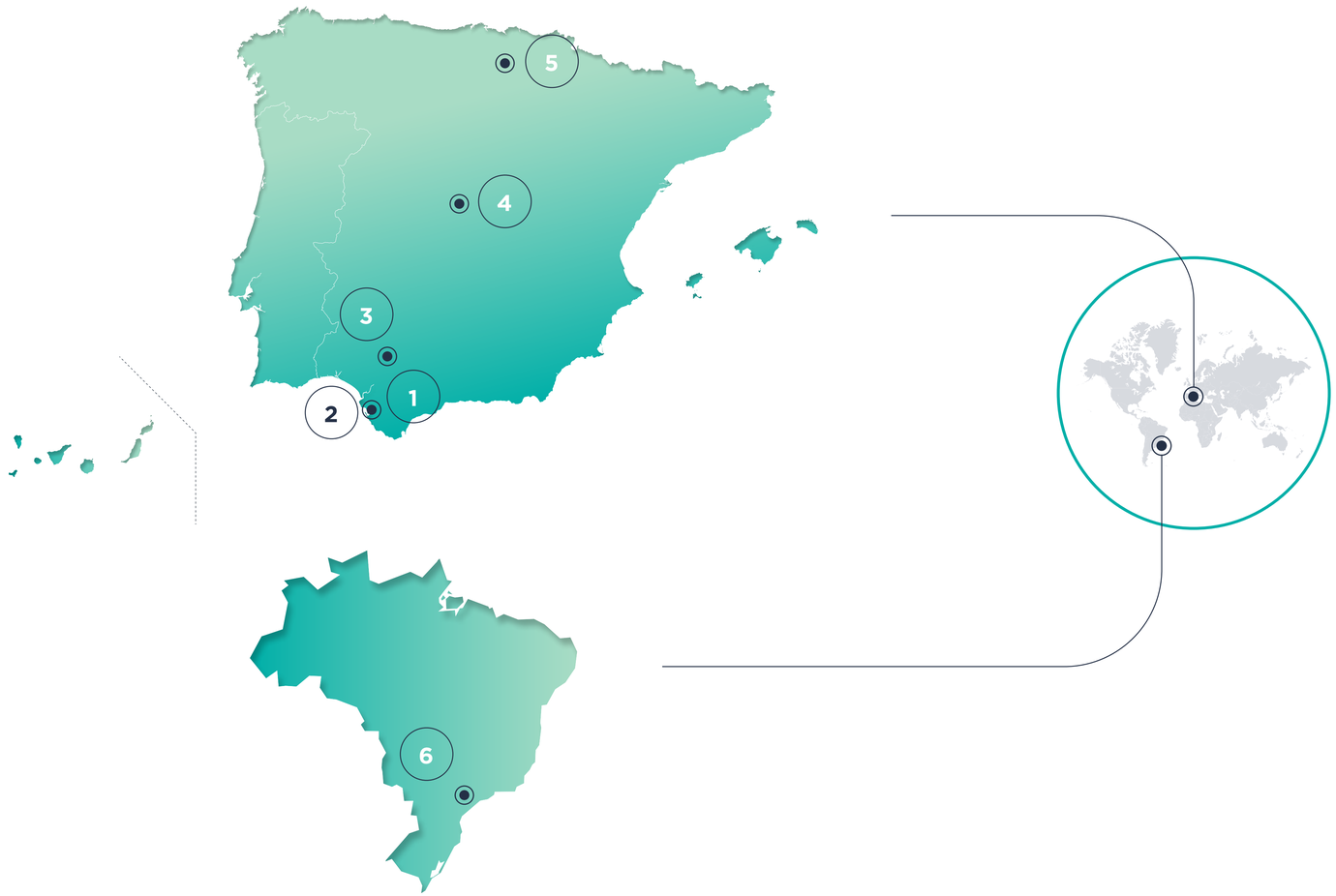
3. ALESTIS SEVILLA
418 PEOPLE

4. GETAFE (MADRID)
21 PEOPLE

5. VITORIA (ÁLAVA)
100 PEOPLE

6. ALESTIS DO BRASIL (BRASIL)
110 PEOPLE

EXTERNAL SERVICES UNIT
34 PEOPLE



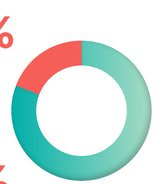
WORKFORCE BREAKDOWN BY COUNTRY AND GENDER

	MEN	WOMEN	TOTAL
SPAIN	753	177	930
	80.97%	19.03%	100.00%
BRAZIL	72	38	110
	65.45%	34.55%	100.00%
TOTAL	825	215	1,040
	79.33%	20.67%	100.00%

TOTAL

♀ 20.67%

♂ 79.33%



SPAIN

♀ 19.03%

♂ 80.97%



BRAZIL

♀ 34.55%

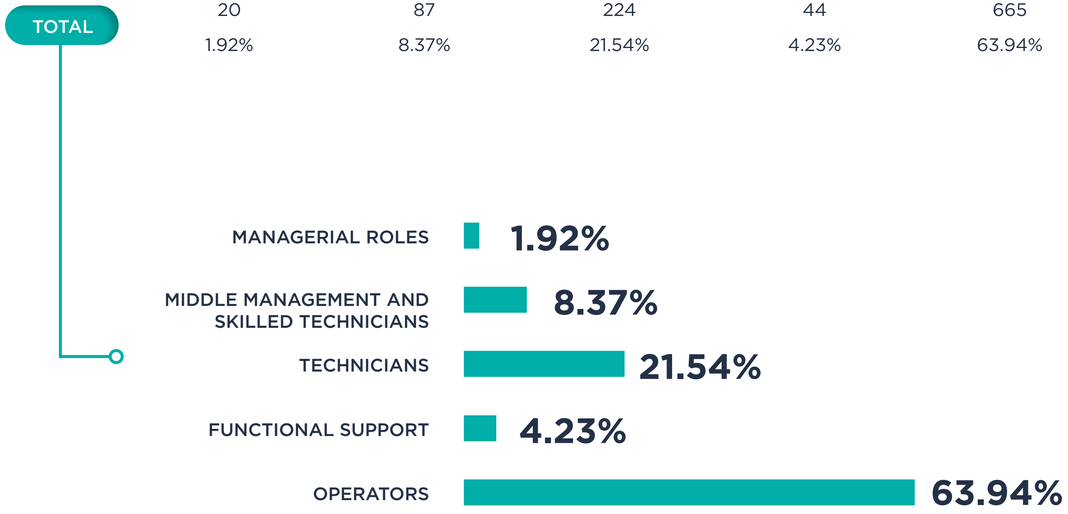
♂ 65.45%





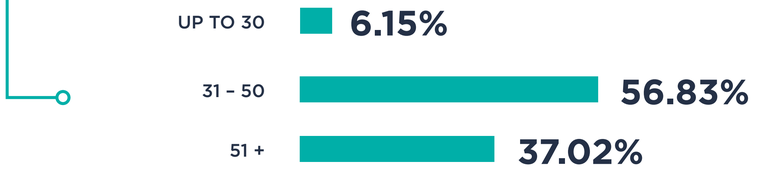
WORKFORCE BREAKDOWN BY COUNTRY AND PROFESSIONAL CATEGORY

	Managerial roles	Middle management and skilled technicians	Technicians	Functional support	Operators
SPAIN	19 1.83%	71 6.83%	223 21.44%	24 2.31%	593 57.02%
BRAZIL	1 0.91%	16 14.55%	1 0.91%	20 18.18%	72 65.45%
TOTAL	20 1.92%	87 8.37%	224 21.54%	44 4.23%	665 63.94%



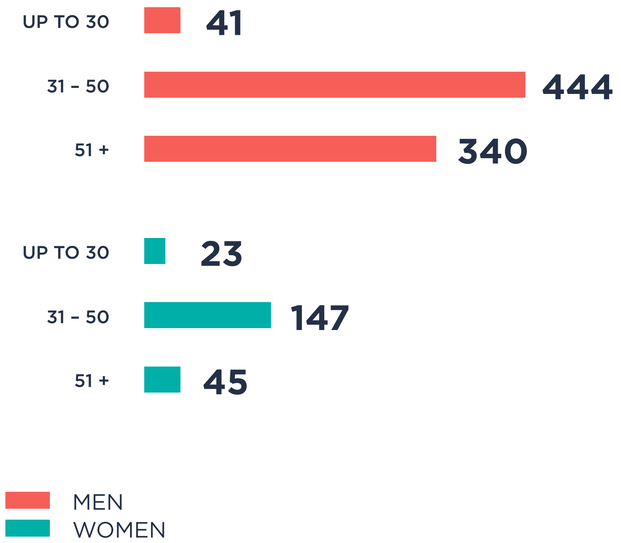
WORKFORCE BREAKDOWN BY COUNTRY AND AGE

	UP TO 30	31 – 50	51 +	Total
SPAIN	17 1.83%	537 57.74%	376 40.43%	930 100.00%
BRAZIL	47 42.73%	54 44.55%	9 8.18%	110 100.00%
TOTAL	64 6.15%	591 56.83%	385 37.02%	1,040 100.00%

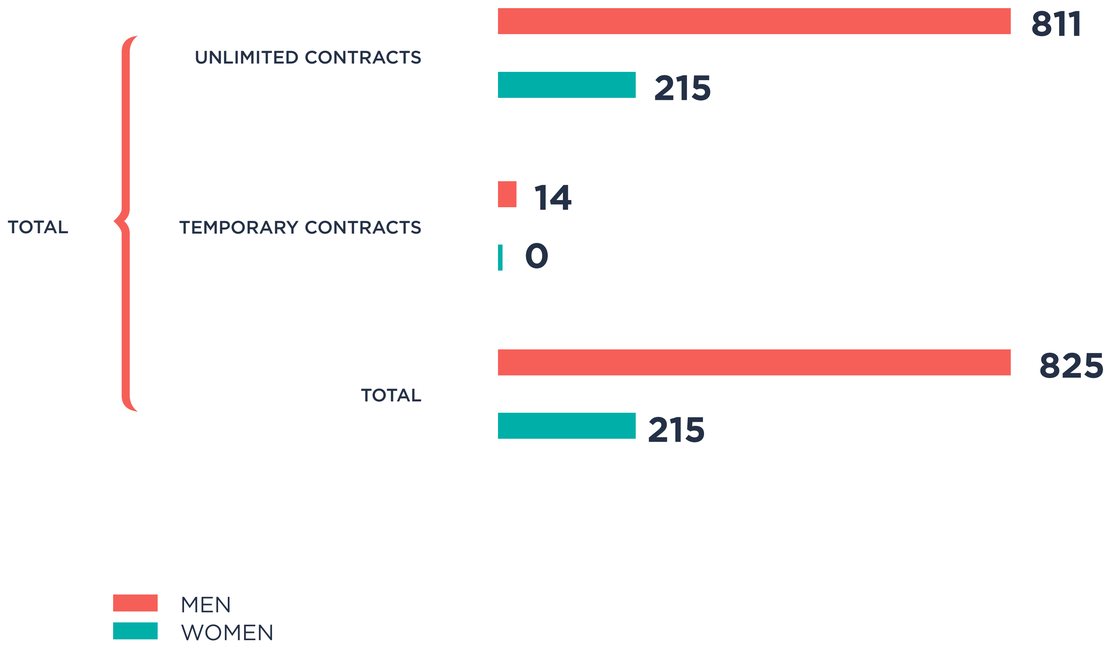


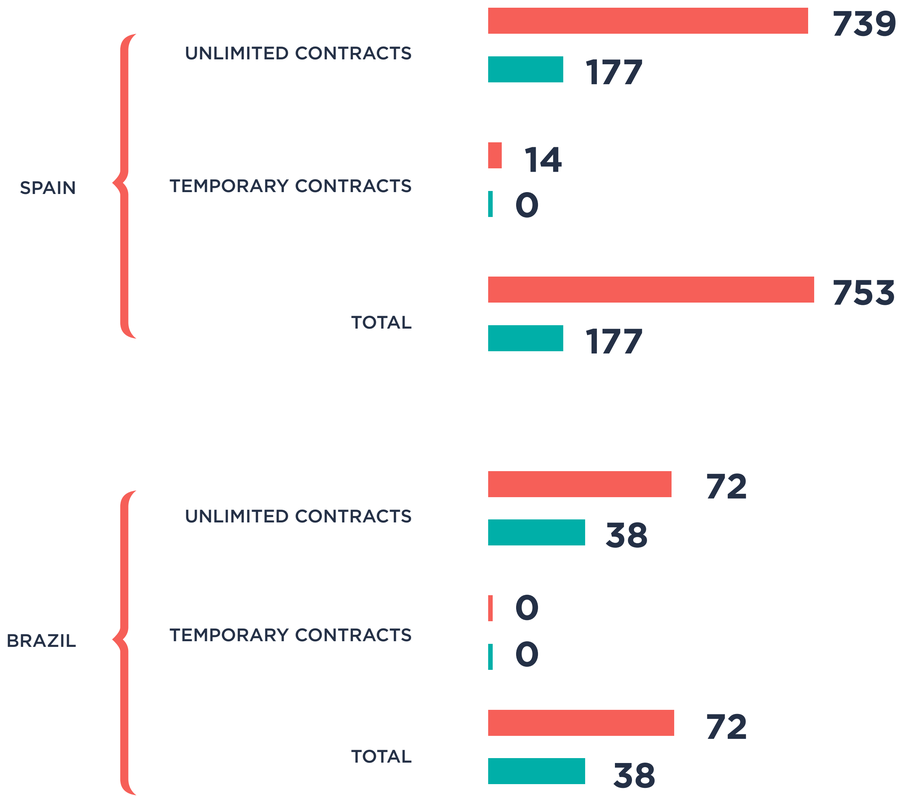
WORKFORCE BREAKDOWN BY COUNTRY, GENDER, AND AGE

		UP TO 30	31 – 50	51 +	Total
SPAIN	Men	13	406	334	753
	Women	4	131	42	177
	Total	17	537	376	930
BRAZIL	Men	28	38	6	72
	Women	19	16	3	38
	Total	47	54	9	100
TOTAL	**Men**	**41**	**444**	**340**	**825**
	Women	**23**	**147**	**45**	**215**
	Total	**64**	**591**	**385**	**1,040**



WORKFORCE BREAKDOWN BY COUNTRY, GENDER, AND TYPE OF CONTRACT





WORKFORCE BREAKDOWN BY COUNTRY, AGE, AND TYPE OF CONTRACT

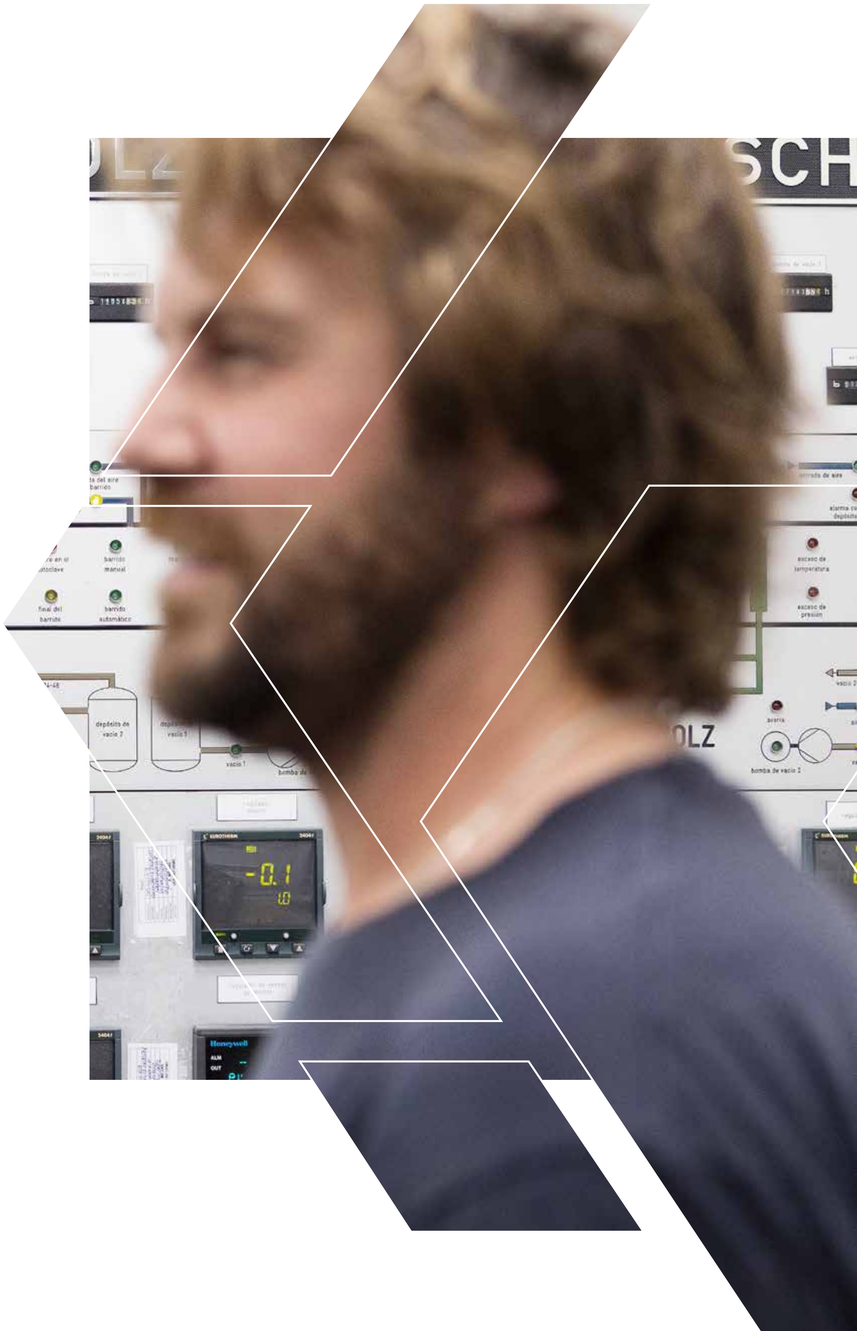
	UNLIMITED CONTRACTS			TEMPORARY CONTRACTS			TOTALES		
	UP TO 30	31-50	50 +	UP TO 30	31-50	50 +	UP TO 30	31-50	50 +
SPAIN	17	537	362	0	0	14	17	537	376
BRAZIL	47	54	9	0	0	0	47	54	9
TOTAL	64	591	371	0	0	14	64	591	385

WORKFORCE BREAKDOWN BY COUNTRY, PROFESSIONAL CATEGORY, AND GENDER

		Managerial roles	Middle management and skilled technicians	Technicians	Functional support	Operators
SPAIN	MEN	17	52	152	13	519
	WOMEN	2	19	71	11	74
	TOTAL	19	71	223	24	593
BRAZIL	MEN	1	11	0	8	52
	WOMEN	0	5	1	12	20
	TOTAL	1	16	1	20	72
TOTAL	MEN	18	63	152	21	571
	WOMEN	2	24	72	23	94
	TOTAL	20	87	224	44	665

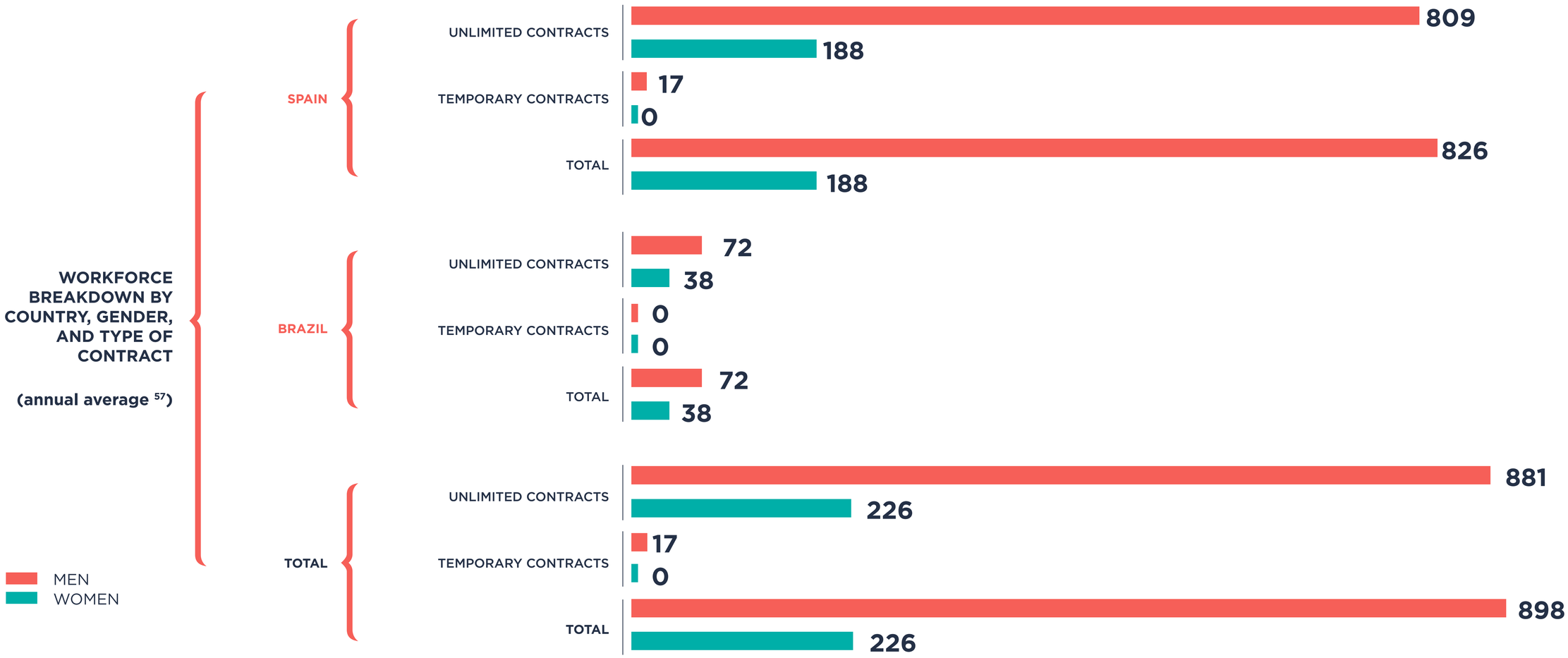
WORKFORCE BREAKDOWN BY COUNTRY, PROFESSIONAL CATEGORY, AND TYPE OF CONTRACT

		Managerial roles	Middle management and skilled technicians	Technicians	Functional support	Operators
SPAIN	UNLIMITED CONTRACTS	19	71	221	23	582
	TEMPORARY CONTRACTS	0	0	2	1	11
	TOTAL	19	71	223	24	593
BRAZIL	UNLIMITED CONTRACTS	1	16	1	20	72
	TEMPORARY CONTRACTS	0	0	0	0	0
	TOTAL	1	16	1	20	72
TOTAL	UNLIMITED CONTRACTS	20	87	222	43	654
	TEMPORARY CONTRACTS	0	0	2	1	11
	TOTAL	20	87	224	44	665



WORKFORCE BREAKDOWN BY COUNTRY, GENDER, AND TYPE OF CONTRACT

(annual average [57])



57. In the case of Brazil, given the low turnover of staff, average headcount is the same as the headcount on December 31, both in this table and in the tables below.

WORKFORCE BREAKDOWN BY COUNTRY, AGE, AND TYPE OF CONTRACT (annual average)

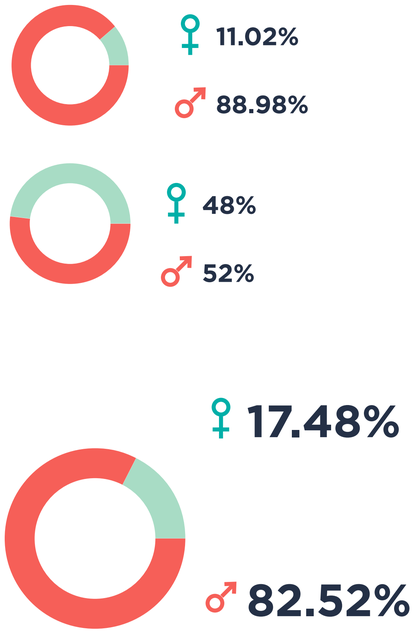
	UNLIMITED CONTRACTS			TEMPORARY CONTRACTS			TOTALES		
	UP TO 30	31-50	50 +	UP TO 30	31-50	50 +	UP TO 30	31-50	50 +
SPAIN	17	591	389	0	1	16	17	592	405
BRAZIL	47	54	9	0	0	0	47	54	9
TOTAL	64	645	398	0	1	16	64	645	414

WORKFORCE BREAKDOWN BY COUNTRY, PROFESSIONAL CATEGORY, AND TYPE OF CONTRACT (annual average)

		Managerial roles	Middle management and skilled technicians	Technicians	Functional support	Operators
SPAIN	UNLIMITED CONTRACTS	20	72	228	28	649
	TEMPORARY CONTRACTS	0	0	3	1	13
	TOTAL	20	72	231	29	662
BRAZIL	UNLIMITED CONTRACTS	1	16	1	20	72
	TEMPORARY CONTRACTS	0	0	0	0	0
	TOTAL	1	16	1	20	72
TOTAL	UNLIMITED CONTRACTS	21	88	229	48	721
	TEMPORARY CONTRACTS	0	0	3	1	13
	TOTAL	21	88	232	49	734

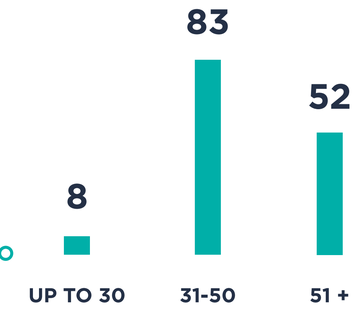
BREAKDOWN OF REDUNDANCIES BY COUNTRY AND GENDER

	MEN	WOMEN	TOTAL
SPAIN	105	13	118
	88.98%	11.02%	100%
BRAZIL	13	12	25
	52.00%	48.00%	100%
TOTAL	**118**	**25**	**143**
	82.52%	**17.48%**	**100%**



REDUNDANCIES BREAKDOWN BY COUNTRY AND AGE

	UP TO 30	31-50	51 +	TOTAL
SPAIN	0	67	51	118
	0.00%	56.78%	43.22%	100%
BRAZIL	8	16	1	25
	32.00%	64.00%	4.00%	100%
TOTAL	**8**	**83**	**52**	**143**
	5.59%	**58.04%**	**36.36%**	**100%**



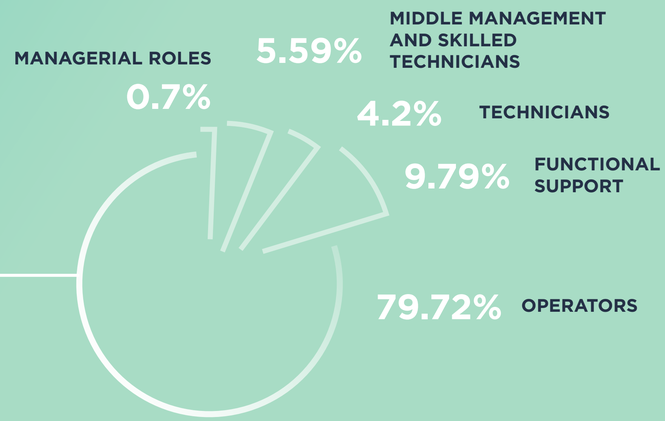
REDUNDANCIES BREAKDOWN BY COUNTRY AND PROFESSIONAL CATEGORY

	Managerial roles	Middle management and skilled technicians	Technicians	Functional support	Operators
SPAIN	1	4	6	7	100
	0.85%	3.39%	5.08%	5.93%	84.75%
BRAZIL	0	4	0	7	14
	0.00%	16.00%	0.00%	28.00%	56.00%
TOTAL	1	8	6	14	114
	0.70%	5.59%	4.20%	9.79%	79.72%

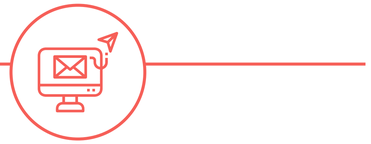
In addition to the staff directly employed by the company, Alestis relies on outsourcing for ongoing services in our plants. These are the ancillary services provided by external suppliers: cleaning, maintenance, surveillance, medical assistance at each plant and IT support.

At Alestis, we have several communication channels to promote an open dialogue with our employees.

In 2021, the flow of communication was higher than in 2020: information on COVID-19 was still being shared in order to strengthen the safety measures of employees against coronavirus.



The most used channels are:



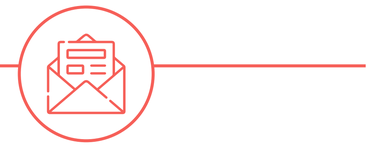
BRIEF NEWS (NEWSLETTERS)

This channel was consolidated as the company's main communication tool. Employees can voluntarily sign up to receive highlights and the most relevant news from each division via corporate and personal email. In 2021, 94 news items were sent, covering aspects such as the development of projects within the Digitalization Department, recommended security measures against COVID-19, the achievement of milestones by the Programs Department or the launch of the Alestis-led vaccination campaign for Andalusian companies.



CORPORATE INTRANET

This in-house web platform compiles all relevant information the employees need to know. Different departments such as HR, Quality Assurance, Communications, or Ethics & Compliance have their own space with all types of information for their users— payslips, a newspaper library with the news published by the company, apps developed for internal use, departmental policies, a repository of internal information, etc.



MANAGEMENT ANNOUNCEMENTS

In 2021, nine communications from management regarding organizational changes within the company.



NEWS

News and videos about Alestis are shown in the screens located in the seating areas and the entrance hall of each of the plants. In 2021, 78 news stories were planned and a special section was created to recall recommended safety measures against coronavirus.

In 2021, we introduced a new space for management and employees to meet and discuss things openly: **Alestis Breakfasts**. It is a program based on informal and voluntary meetings between the employees and the CEO in the different plants. This initiative fosters a relaxed and friendly environment and gives employees the opportunity to ask questions and engage in discussions on specific topics of interest. It's also a way for the CEO to actively listen to the staff and gauge their mood, all of which has a positive impact on team engagement and cohesion.

Alestis has registered representatives for its workers in all plants in Spain and Brazil as representatives through trade unions.

Labor relations are governed by the sectoral collective agreement, the different regional collective agreements applicable by their functional area, and a specific agreement for the plant in Vitoria. Thus, 100% of the workforce is covered by a collective agreement in all the countries where we work.

At Alestis do Brasil, the negotiations and dialogs concerning the company are held directly between leaders and employees. In cases of collective bargaining, negotiations take place between the union, the company, and the workers.

STAFF

TRAINING & CONTINUING PROFESSIONAL DEVELOPMENT (CPD)

Employee development is key to Alestis' strategy. Therefore, it has programs that support people's learning and growth.



STAFF

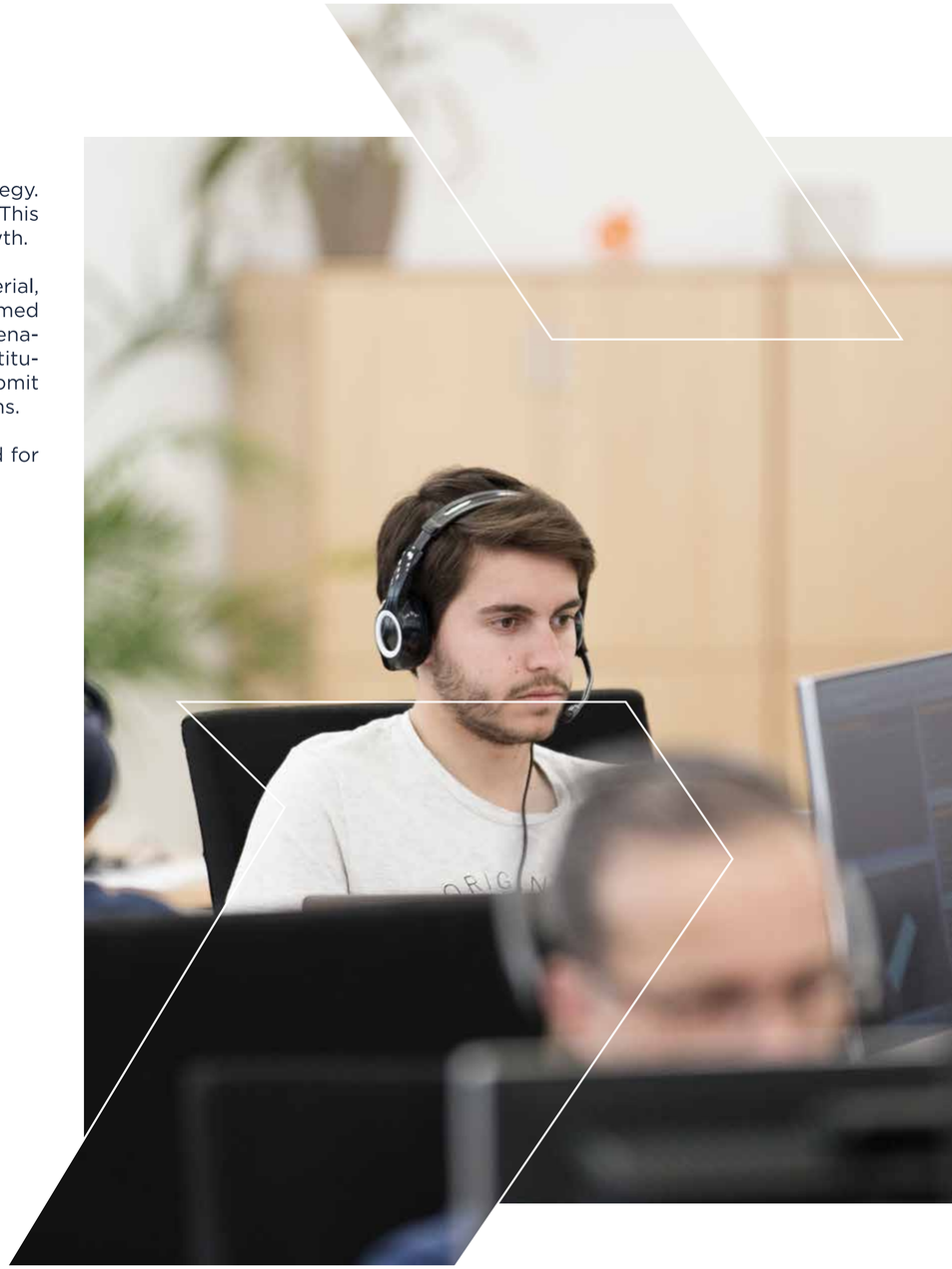
TRAINING & CONTINUING PROFESSIONAL DEVELOPMENT (CPD)

Alestis develops an annual training plan and provides its employees with the tools to improve their knowledge, skills and attitudes.

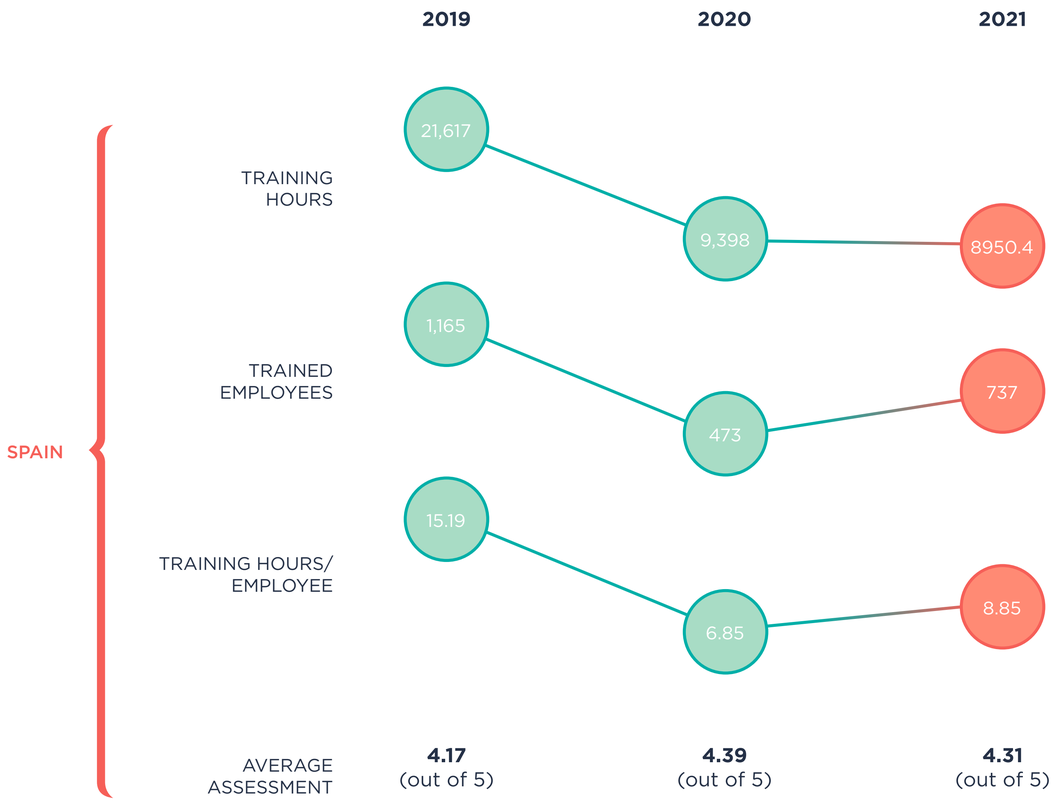
Our employees' professional development is at the heart of Alestis's strategy. We see it as the only way to ensure high motivation and commitment. This is why we implement specific programs that support learning and growth.

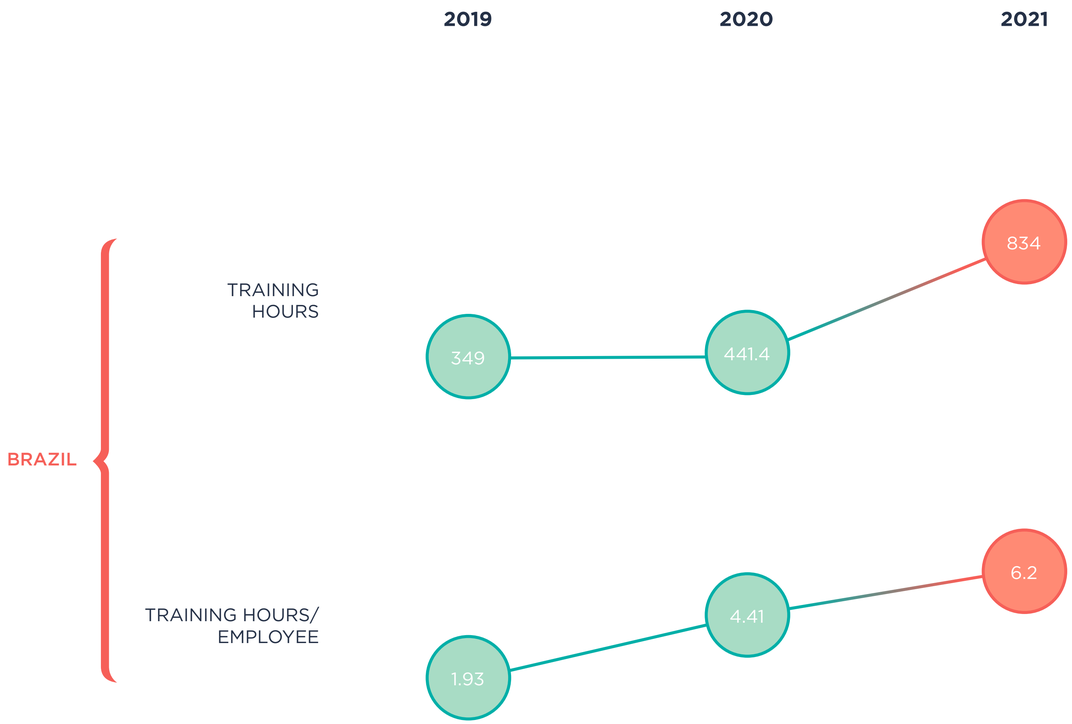
To encourage their professional training and development of managerial, technical, and leadership skills, Alestis devises an annual CPD plan aimed at helping the company achieve the highest quality and efficiency, and enabling our staff to access tools to improve their knowledge, skills, and attitudes. Those in charge of the productive and administrative areas may submit requests for training courses to promote the development of their teams.

The **2021 CPD Plan** included specific training for each department and for professional development.



TRAINING RATES





BREAKDOWN OF TRAINING HOURS BY SEX AND PROFESSIONAL CATEGORY

		MEN	WOMEN	TOTAL
SPAIN	MANAGERIAL ROLES	76.8	27.2	104.0
	MIDDLE MANAGEMENT AND SKILLED TECHNICIANS	589.0	122.5	711.5
	TECHNICIANS	2,855.3	1,169.1	4,024.4
	FUNCTIONAL SUPPORT	6.0	104.0	110.0
	OPERATORS	3,707.5	293.0	4,000.5
	TOTAL	**7,234.6**	**1,715.8**	**8,950.4**
BRAZIL	MANAGERIAL ROLES	0	0	0.0
	MIDDLE MANAGEMENT AND SKILLED TECHNICIANS	92.0	40.0	132.0
	TECHNICIANS	0.0	40.0	40.0
	FUNCTIONAL SUPPORT	38.0	61.5	99.5
	OPERATORS	476.1	86.4	562.5
	TOTAL	**606.1**	**227.9**	**834.0**

In 2021, **Program PI ®** was one of the key projects to foster people's development through coaching. This program uses a profile tool—The Predictive Index— that provides a behavioral assessment to help us understand how a person responds to their work environment, to other people, and how they fit into their role/function, and into the natural work teams. Once this information has been gathered, one session is held with each of them and another with the person in charge of their development and the teams'. In 2021, 45 people (the team in Vitoria and the calculus team) and 11 natural teams had a development session and were evaluated. During the session, an individual development plan is discussed with them.

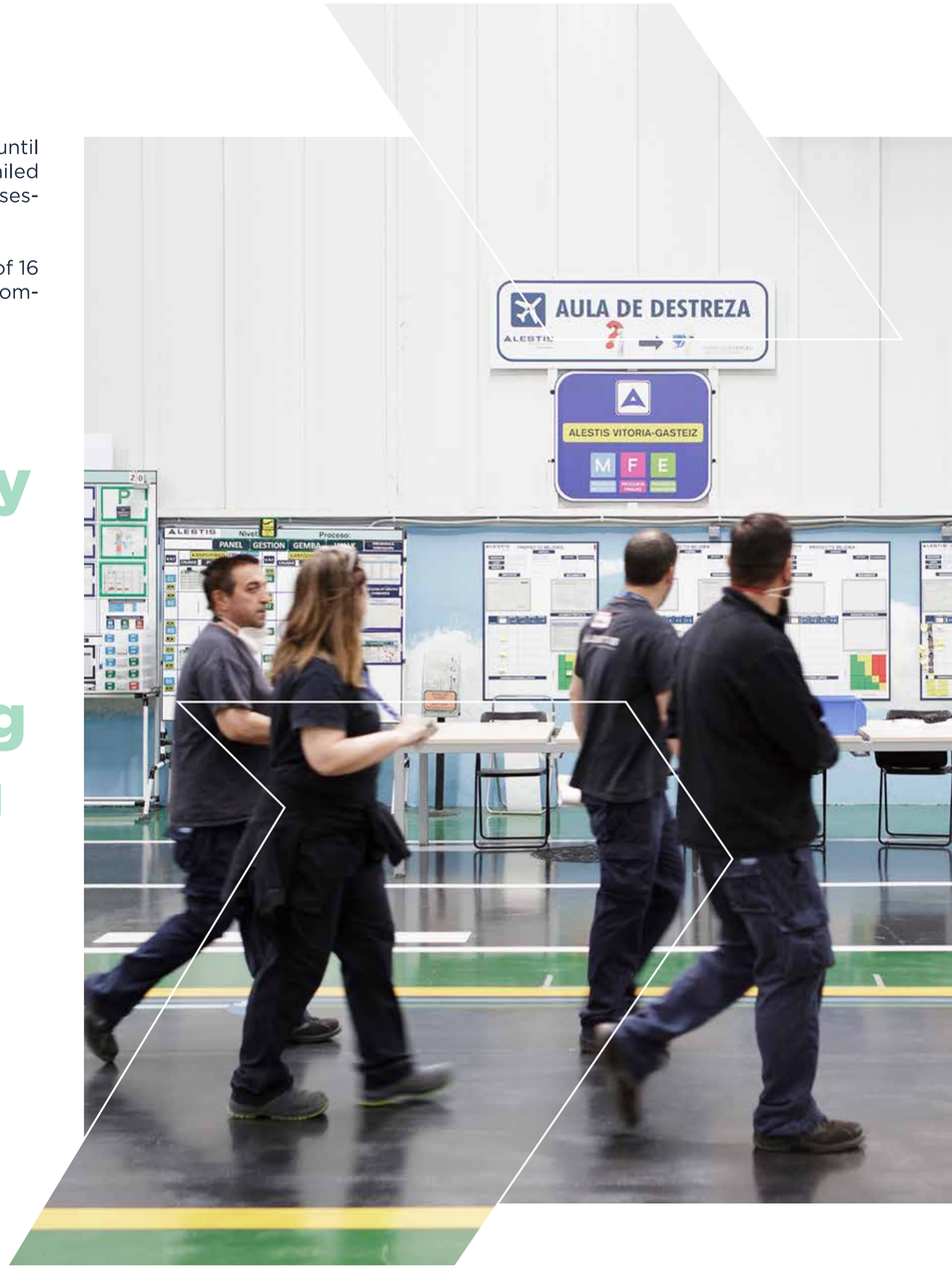
Another key people development project was the launch of **"Learning Communities"** focused on workshop managers. The idea behind it is help participants to strengthen their role and provide them with tools to promote professional growth and improve their skills. They are a series of hands-on workshops where self-development, recognition, distance management, pending conversations, etc. are dealt with. Through experimental exercises, participants' safety, responsibility, and personal confidence can grow. At the end of the workshop series, there is a one-on-one feedback session where the knowledge learned throughout the program is assessed and continuity guidelines to help them in future are shared.

Regarding new recruits, we are still using the program **"Know Your Company".** It's based on the idea that their on-boarding is a process that should be managed jointly by HR and the specific department hiring the person. The purpose is to help them fit into the organization smoothly. When someone joins Alestis, they have a welcome session with HR where they learn about the company, our mission and values, our Family Responsible Company Policy, specific information about what the job entails, and all the legal details. After this, COVID-19 restrictions permitting, they are taken on a tour of the plant for them to get to know the different areas. In addition, we carry out a suitability analysis to find out if the person is a good fit for the job and draw a training plan with any training needs they may have to guarantee their success. In 2021, this program was implemented for one person.

The talent spotting program **Programa Talentos** was postponed again until 2022. It seeks to generate a talent map, where each person has a detailed profile listing their skills and motivations through a development center session. Then, a development path is set up.

In Brazil, there is an initiative to help young orphans between the ages of 16 and 18 access employment by providing them with a career path that combines theoretical training with work experience.

In Brazil, the company has an initiative to promote the employment of young orphans by providing them with a career path.



STAFF

WORK-LIFE BALANCE

Alestis is committed to the employees' work-life balance, equality, development and diversity, and continues to work on the EFR certificate.



STAFF

WORK-LIFE BALANCE

Alestis has a broad catalog of published work-life balance measures, which establishes the package of measures available to the entire organization.

With regard to the working day in Alestis's plants in Spain, we find two models: a split working day for technical staff, and a continuous working day for direct employees. The split working day offers flexible starting times, as specified in the work schedules for each plant, as well as intensive working days to be able to clock out earlier at certain times of the year.

Alestis do Brasil had two work shifts in 2021 (administrative and production). The administrative shift goes from 7:30 AM to 5:30 PM, while the production shift goes from 5:50 AM to 3:40 PM, there were no differences between departments and jobs.

At Alestis, we are still committed to our employees' work-life balance, equality, development and diversity, and we have kept on working on the EFR certificate (Family Responsible Company): a work-life balance management model, which was granted to our plants in Spain in October of 2019, and was renewed the same month of 2020 and 2021.

There is a work-life balance catalog for all employees to see the package of available measures. These focus on employment quality (13), development (3), family support (5), equality (1), leadership (5), and flexibility (5).

In 2021, we conducted a survey to determine the degree of knowledge, use and satisfaction they generate in the workforce.

Last year, a new measure was added to the catalog: a hospitalization allowance (payroll bonus up to 100% of the salary). This measure is new to the Sevilla plant, since other agreements already included such an allowance.

Additionally, due to the pandemic, office staff can continue **working from home.** From April 2021, there is a mixed model whereby employees return to work two days a week (alternate Fridays) according to two assigned groups, A or B, in order to guarantee the social distancing and a 50% capacity. For those jobs that cannot be done from home (operators and other workers needed in the production area), arrival and departure protocols were established in the factories to avoid crowds. In September 2021, all employees returned to the office in the morning and worked from home in the afternoon, while maintaining the flexibility both in the workplace and at home.



In the Spanish plants in 2021, one person (a woman) was on leave of absence to take care of her child, while 40 people (29 women and 11 men) were granted a reduction in working time for the same reason, and two (one women and one man) to take care of a family member. In Brazil, there were no maternity, paternity or nursing leaves in 2021.

At the time this report was being written, Alestis did not have a right to digital disconnect policy, however, we are planning to work on one throughout 2022.



STAFF

EQUALITY & DIVERSITY

Alestis is committed to diversity and equal opportunities, guaranteeing equality between men and women in access to employment, training, promotion and working conditions.



STAFF

EQUALITY & DIVERSITY

Alestis maintains its collaboration with the University of Cadiz, through the Univergem program, to promote the insertion, employability and entrepreneurship of university students through internships in the company.

Alestis is committed to diversity and equal opportunities. The company is aware of how important it is to ensure **equal opportunities for men and women** regarding access to employment, training, promotion and working conditions; as well as the **management of diversity,** showing respect for the individual traits and personal dignity, privacy and personal rights of each employee within our organization.

Therefore, we do not tolerate and actively pursue any action that may result in **discrimination** on the grounds of origin, nationality, ideology, religion, race, gender, age or sexual orientation, or harassment or injury to a person's dignity.

Alestis has a Plan for Equality in place for each plant, in accordance with Organic Law 3/2007, of March 22, for the effective equality of women and men. All these plans have a **protocol for the prevention of harassment** which reinforces what is stated in the Alestis Code regarding diversity. This protocol was not activated in 2021.

HR ensures equal opportunities between men and women during the recruitment processes, whether internal or external. All national and international vacancies and mobility opportunities are published internally.

Due to the pandemic, the adaptation of Alestis's Plan for Equality to meet the requirements specified in Royal Decree 901/2020, of October 13, on the regulation of equality plans and their registration had to be postponed to 2022.

Alestis do Brasil does not have a Plan for Equality in place because there is no such legal requirement in the country. However, we strive to maintain the balance between all employees, regardless of their gender, and follow criteria that promote inclusion, respect, and diversity.

We continued our collaboration with the University of Cadiz in the **UNIVERGEM Program,** aimed at promoting the insertion, employability and entrepreneurship of female university students through internships in Alestis. However, in 2021 we had to cancel the internships again because of the pandemic.

Alestis aims to hire the best professionals for each position, regardless of gender, age, religion, race, sexual orientation, etc. For this reason, all recruitments and promotions are based on the person's potential, performance, talent, and behavior and how they fit within the company.

Likewise, Alestis supports the integration into working life of people with disabilities. In Spain, we currently have eight employees with a 33% disability, and alternative measures have been approved to cover the remaining posts; namely, hiring the services of six special employment centers, which amounted to a total of €345,718.80 for the tax year 2021 (as opposed to €324,783 in 2020). Alestis do Brasil does not employ any people with disabilities.

Alestis did not launch specific initiatives concerning the universal accessibility for handicapped people.

STAFF

COMPENSATION POLICY

In accordance with the Compensation Policy, similar jobs are grouped together to form job families.



STAFF

COMPENSATION POLICY

The Alestis Compensation Policy in Spain covers the workers in leadership, technical, or project management roles.

Alestis's employees are classified according to "roles": groups of positions with similar levels of responsibility and task complexity, to which the company assigns similar salary ranges. These roles are:



Alestis's **Compensation Policy** in Spain covers the workers in leadership, technical, or project management roles. In other words, jobs included in the family ranges from M to T—managers of technical or functional areas (M), managers of technical or functional areas or sub-areas (P), senior team coordinators or technicians (C), and engineers and technicians (T). They are a key group for the company, and as such they are expected to show great engagement and commitment, as well as a special interest in the company's strategic objectives and the results achieved.

According to the Compensation Policy, similar jobs are grouped together to form job families (the above-mentioned M, P, C, and T). These families fall within certain salary ranges, which are used to define wages and benefit levels.

To classify the above-mentioned positions within the roles, we have carried out an assessment based on **key factors** which measure the relative contribution of these jobs to the company. Once each position has been assessed, it is possible to assign them a fair compensation directly proportional to the responsibility they involve.

The total compensation (the monetary amount a person can receive) for ranges M, P, and C, and for all those excluded from the Compensation Policy (senior management and managerial roles) includes a fixed salary and a variable salary based on achieved objectives. The other range (T) only includes a fixed salary.

The **fixed salary** is classified in salary ranges according to the different job levels and the job assessment carried out through key factors (features that are present in every job, to a greater or lesser extent).

Each level is based on points, so it is possible for positions at the same level to receive a different compensation based on the result of the assessment. And, based on individual characteristics, each person may have a different salary from other colleagues in the same range. The criteria considered for individual promotion within a salary range are individual performance, suitability of key behaviors, position within the range, expertise, and assessment by the direct manager. The result from all these criteria makes it possible for an employee to move within the range.

The **variable compensation** is linked to the fulfillment of a series of objectives which are reviewed annually against our "Result-oriented Management" procedure. Depending on which range the person's role is framed in, their variable compensation will have a maximum percentage.

The goal management model includes:

COMPANY OBJECTIVES

Defined by Management and related to the economic, productive, employee, and quality objectives.

INDIVIDUAL GOALS

those that help meet the business goals from each individual role.

The impact an employee who receives variable compensation may have on the company goals changes considerably, this is why the weight of the goals set for each person is based on their salary range and job family.

There is a **Compensation Committee** made up of HR and some members of the Steering Committee. They analyze the following topics in order to determine each year's Compensation Policy:

The **frameworks** within the wage policy (access to it by people in lower ranges).

Calibration and homogenization of performance **assessment results** and salary reviews.

Salary reviews and promotions, according to the available budget and the results given by the different managers.

Promotions by those granted the Technical Specialist diploma.

For annual salary reviews and level upgrades due to promotions or technical diplomas fund is created based on a percentage of the total wage bill of the levels referred to in the Compensation Policy. This fund is distributed among the different departments and used by the Compensation Committee to propose salary changes.

In the case of Alestis do Brasil, the fixed salary is organized and grouped in salary ranges. People move within the ranges and groups based on their individual performance, position within the range/group, their expertise, assessment by their direct manager, and seniority.

Variable compensation for members of the Steering Committee is linked to the fulfillment of individual (and general) objectives, which are reviewed annually against defined criteria (many of them agreed upon with the employee).

Support personnel and direct personnel (operators) are governed by a collective agreement both in Spain and Brazil.

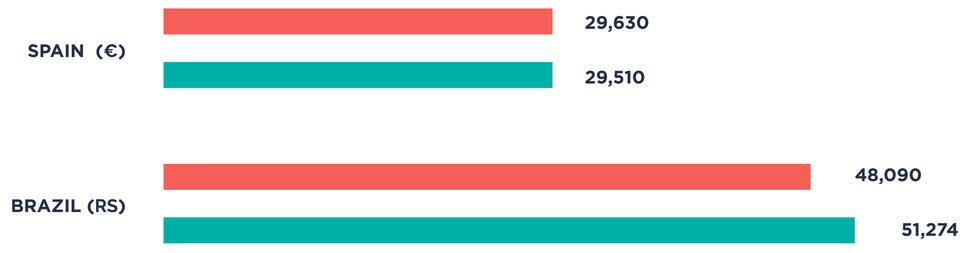
As for the Board of Directors, they all receive compensation; namely, a fixed annual allowance determined at the General Meeting for each financial year. In 2021, the total compensations paid by the company to consultants amounted to €281,250 [approx. $322,000].

All members of the Board of Directors receive the same compensation regardless of their gender: €45,000 [approx. $48,000]. In October 2021, it was agreed to increase the board by one member, who also received their proportional share of the annual salary.

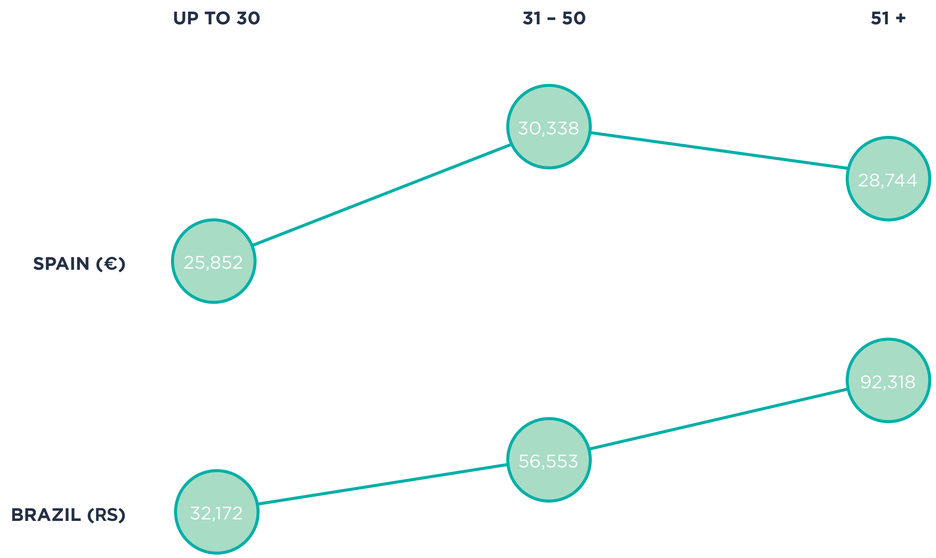
In 2021, trustees received no contribution whatsoever in the form of funds or pension plans nor were they promised such benefits. Trustees received no compensation in the form of profit share, life insurance premiums or long-term pension plan systems. Neither were they granted shares or stock, nor outstanding stock options, advances or loans. Finally, they did not receive subsistence allowance, variable compensation, or indemnity.

AVERAGE ANNUAL COMPENSATION BY GENDER [58]

UNLIMITED CONTRACTS



AVERAGE COMPENSATION BY AGE



58. The data from 2021 was affected by the furlough scheme.

The economic difference in the average annual compensation is not due to discrimination between men and women, but rather to the fact that the overall presence of women among the staff is still significantly smaller, and was even more so in the past, which may affect these data in terms of seniority.

AVERAGE COMPENSATION BY GENDER AND PROFESSIONAL CATEGORY

		Men	Women
SPAIN (€)	MANAGERS	99,892	114,850
	MIDDLE MANAGEMENT AND SKILLED TECHNICIANS	52,203	48,069
	TECHNICIANS	33,746	30,177
	FUNCTIONAL SUPPORT (NOT COVERED BY THE COLLECTIVE AGREEMENT)	23,085	20,444
	OPERATORS AND FUNCTIONAL SUPPORT (COVERED BY THE COLLECTIVE AGREEMENT)	24,018	23,146
BRAZIL (RS)	MANAGERS	15,756 [59]	0
	MIDDLE MANAGEMENT AND SKILLED TECHNICIANS	116,861	114,378
	TECHNICIANS	0	62,371
	FUNCTIONAL SUPPORT (NOT COVERED BY THE COLLECTIVE AGREEMENT)	53,978	48,917
	OPERATORS AND FUNCTIONAL SUPPORT (COVERED BY THE COLLECTIVE AGREEMENT)	34,965	29,857

59. Minimum amount according to Brazilian regulations. The rest of the compensation received by the director of Alestis do Brasil comes from Spain (and has been accounted for as such in the top row).

AVERAGE COMPENSATION BY PROFESSIONAL CATEGORY [60]

	Managerial roles	Middle management and skilled technicians	Technicians	Functional support	Operators
SPAIN (€)	101,467	51,097	32,615	21,874	23,909
BRAZIL (RS)	15,756	115,868	62,371	50,417	33,658

60. By Management, we refer to people on managerial roles, middle management and skilled technicians, leaders of functional and/or technical departments, technicians, qualified personnel with technical skills in different areas, support functions, personnel who perform supportive tasks for the rest of the organization, operators, and workshop specialists who perform manufacturing and/or assembly tasks.

STAFF

HEALTH & SAFETY

Alestis is committed to achieving the highest levels of health and safety in the workplace.



STAFF

HEALTH & SAFETY

Alestis joined the *Aciturri/Alestis Joint Prevention Service*, which covers all three technical specialties: safety, hygiene, and ergonomics.

Alestis's commitment to safety moves us to aim for the highest level of health and safety in the workplace. To this end, we renewed our prevention plan in 2021, which was included into the new **Integrated Management System in Safety, Health and Environment,** based on ISO 45001 and ISO 14001 standards.

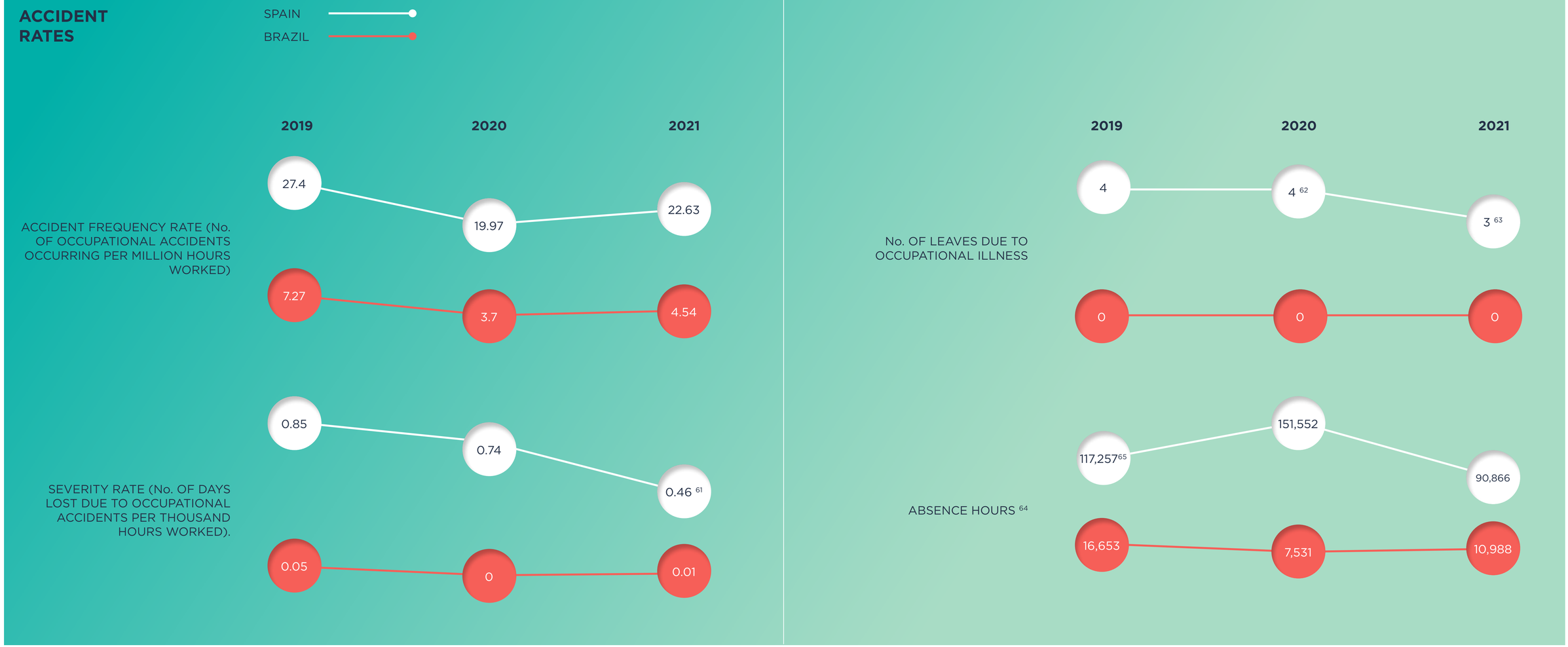
At the cornerstone of this system is our Occupational Risk Prevention and Environmental Policy, which defines the company's commitments in this matter and is approved by the management team:

> *Workers' health and safety, as well as care for the environment, are a key part of the company's operations and will be developed through an Integrated Management System based on ISO 45001 and ISO 14001 standards.*
>
> *It is the commitment of Alestis Aerospace, and the responsibility of all areas of the company, to identify, prevent and avoid the hazards and risks to the health of workers and the environment that may arise from our operations.*
>
> *Likewise, Alestis Aerospace will encourage our subcontractors and supply chain to also follow the principles of this policy by providing our support and knowledge in the preventive and environmental management of those operations derived from their relationship with Alestis Aerospace.*
>
> *Alestis Aerospace shall have the necessary means to identify the applicable legal requirements, and any other requirements that the organization may subscribe to regarding safety, health, and the environment. Alestis Aerospace will provide the staff with the necessary information and training to ensure that they know each other and carry out safe and responsible practices in order to promote a genuine preventive and environmental culture, focused on the continuous improvement of both working and environmental conditions.*
>
> *Alestis Aerospace guarantees the involvement and participation of workers in matters related to safety and health and the protection of the environment.*
>
> *Alestis Aerospace will provide the framework for establishing and reviewing the safety, health and environment objectives.*
>
> *Alestis Aerospace's Health, Safety and Environment Management System guarantees the continuous improvement of its efficiency through the control and monitoring mechanisms of the performance available at the company.*

In 2021, Alestis Spain joined the Aciturri/Alestis Joint Prevention Service, which covers all three technical specialties—safety, hygiene, and ergonomics— covered by its own service before. An external company, Quirón Prevención, monitors health and safety issues and helps coordinate the protocols to be applied for each task on account of the risks it poses.

The management of accident indicators is governed by the INSST's (the Spanish National Institute of Health and Safety at Work) criteria and defines frequency and severity rates.

ACCIDENT RATES



61. Each accident without medical leave counts as a half day lost.
62. All men.
63. A medical leave first taken in 2019 had to be taken again on two different occasions in 2021.
64. The absence hours report lists the sum of non-structural absence hours (common illness or non-occupational accident lasting less than 30 days, occupational accident leading to medical leave for over 30 days, medical leave related to COVID-19, occupational accident not leading to medical leave, unauthorized absences, and work conflicts) and structural absence hours (common illness or non-occupational accident lasting over 30 days and long-term occupational accidents).
65. An error was detected in the data for 2019: only the absence hours for direct labor (99,511) were reported; including the indirect labor, the total amounted to 117,257 hours.

ACCIDENT RATES BY COUNTRY AND GENDER

	SPAIN (€)			BRAZIL (R$)		
	Men	Women	Total	Men	Women	Total
ACCIDENT FREQUENCY RATE (No. OF OCCUPATIONAL ACCIDENTS LEADING TO MEDICAL LEAVE OCCURRING PER MILLION HOURS WORKED)	28.36	0	22.63	4.54	0	4.54
SEVERITY RATE (No. OF DAYS LOST DUE TO OCCUPATIONAL ACCIDENTS PER THOUSAND HOURS WORKED)	0.57	0.01	0.46	0.01	0	0.01
NO. OF LEAVES DUE TO OCCUPATIONAL ILLNESS	2	1	3	0	0	0

To ensure everyone's participation in relation to ORP, the company has Health and Safety Committees that provide coverage to 94% of the workers in Spain. In the Headquarters and the plants at Vitoria and Puerto de Santa María, these health and safety committees have expanded, with the agreement of the social partners, to Safety, Health and Environment Committees, hence including all workers not only in the preventive system, but also in the environmental one. They meet periodically as needed and at least on a quarterly basis, as per the regulations.

In the case of Brazil, they have the Commission for the Prevention of Internal Accidents (CIPA), where trade union representatives play a part. Trade union representation also participates in the Occupational Risk Prevention Management System.

In light of the COVID-19 pandemic, in 2021 Alestis maintained all protocols developed in 2020, and adapted them to the changing epidemiological circumstances throughout the year.

In 2021, Alestis implemented a plan for the safe and progressive return of the staff to the offices called **"RTW Plan"** with the aim to guarantee a safe working environment during the COVID-19 pandemic. This plan established safety, health and flexibility measures such as voluntary online training on COVID-19 (provided by Quirón Salud), a staggered and hybrid return to work model which included working on-site or from-home, an analysis that looked at the development of different safety and cleaning protocols, recommendations regarding COVID-19, etc.

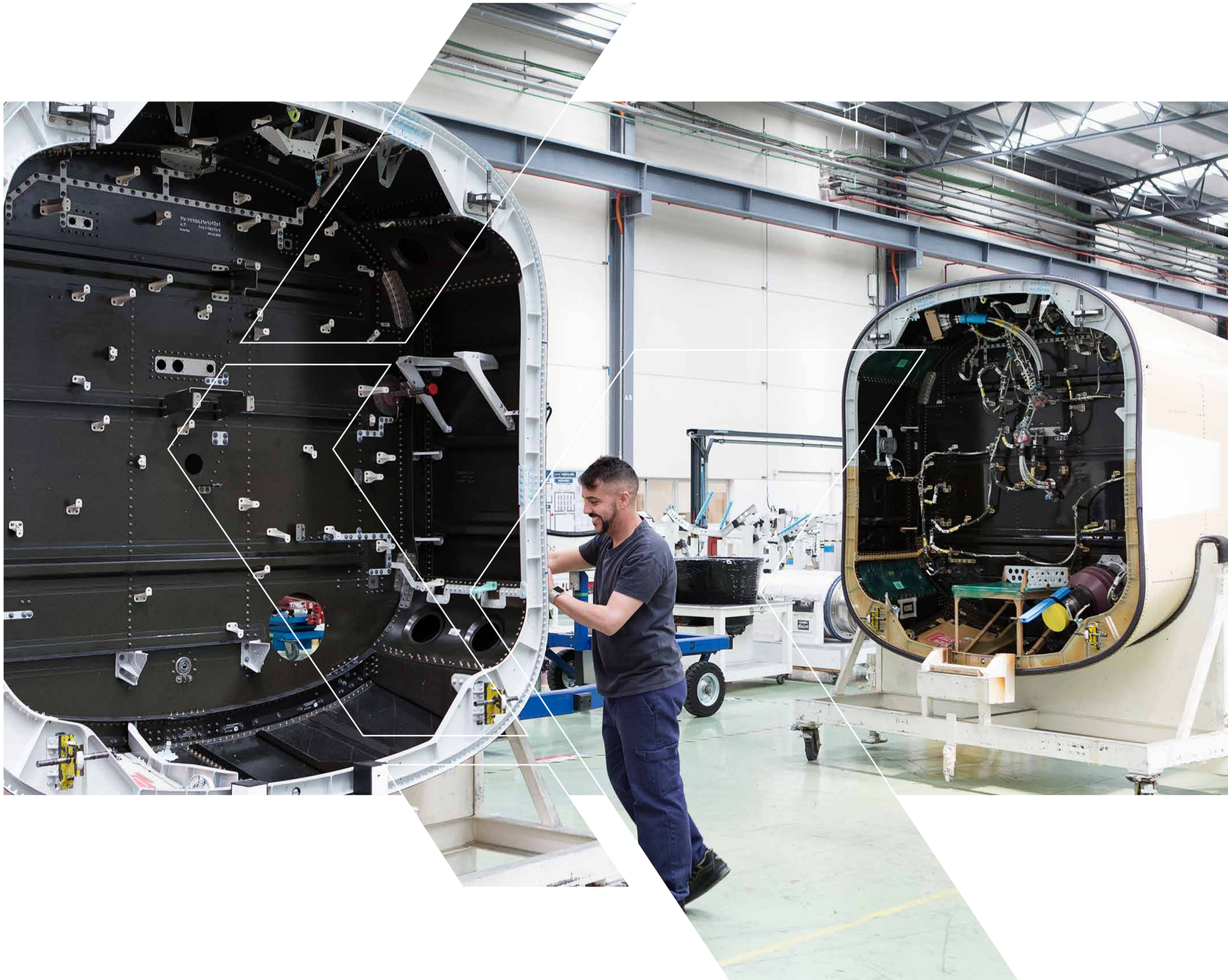
On an annual basis (or more often according to specific protocols, medical advice, or risk levels identified for each job), the workers undergo a medical check-up as part of the company's commitment to keep everyone healthy. The health protocols for each person are determined by the doctor in charge of our health program based on the risks the worker is exposed to.

At Alestis, we are proactive about leading a healthy lifestyle. As a result, we adhere to the **Luxembourg Declaration on Workplace Health Promotion** to continue encouraging healthy habits among our workers inside and outside the workplace.

Alestis do Brasil has an **Occupational Risk Prevention Management System based on the Brazilian standard set by the Ministry of Labor.** All departments receive assistance and are 100% covered against chemical, physical, biological and ergonomic contamination risks by standard NR 9 in the Environmental Risk Prevention Program (PPRA in Portuguese), compliant with Ordinance 33,214 of 1978.

Every year, the company holds an Internal Week for the Prevention of Accidents at Work (SIPAT). The program includes talks and other activities aimed at preventing occupational accidents and diseases like cancer, HIV, STDs, etc.

All workers can use the collective health system, although there is also a private company agreement in place.



ENVIRONMENTAL MANAGEMENT

Alestis is committed to sustainable business practices that respect the environment.



ENVIRONMENTAL MANAGEMENT

Following Alestis Code, we strive to implement sustainable business practices—to respect the environment, **minimize the effects of our actions,** manage waste efficiently, and conserve and save energy and other resources.

To ensure compliance with this commitment, in 2021 Alestis implemented structural changes to the Environment Management Department, which now reports to the Safety and Environment Manager within HR. This change favors the integration of Occupational Risk Prevention and Environmental resources in a built-in management system based on the ISO 14001 standard. It was fully implemented in every plant and certified by a third party in Vitoria.

In 2016, the company started drafting an **Environmental Plan,** a document that describes how we manage environmental matters. Then, the first edition of our **Environmental Policy** was finished, and last revised in July 2021 in order to integrate it within our occupational risk prevention measures (see section "Health and Safety"). This Environmental Plan was also revised in 2021 for integration with ORP.

Each plant has its own regulations issued by the competent administration, which determines the environmental controls to be carried out in each of the locations. Specifically, the level of authorization for each plant is as follows: Integrated Environmental Authorization in Vitoria; Unified Environmental Authorization in Tecnobahía and Sevilla; and Environmental Qualification in Puerto Real.

Alestis do Brasil follows at all times the guidelines defined by the CONAMA Resolution, as well as those of the Environmental Company of the State of São Paulo through the qualification of the facilities and, in turn, by means of analytical reports applied by norm NBR 10.004. It has been certified by the Brazilian Ministry of the Environment, and the Brazilian Institute for the Environment and Renewable Natural Resources; it also has an Operating License issued by the Government of the State of São Paulo.

THE MAIN ENVIRONMENTAL ASPECTS ARE:

IN SPAIN

NON-HAZARDOUS WASTE PRODUCTION [66].

EN BRAZIL

POLLUTION THROUGH ATMOSPHERIC EMISSIONS, CHEMICAL AND FLAMMABLE SOIL POLLUTION, WATER POLLUTION, AND PEST INVASION.

Regular measurements of discharges, noise, or emissions are taken at each plant when necessary. However, Alestis's measures to protect the environment go beyond compliance with mandatory regulations.

Regarding external noise, in those plants where sound measurements are required, these are carried out with the prescribed frequency and, until now, the limits have not been exceeded. Specifically, in 2021 noise measurements were taken in Alestis Sevilla and the values obtained were within the legal limits.

Alestis do Brasil complies with the applicable noise regulation (NBR 10151, Conama Resolution for urban noise and NR 15 from the Ministry of Economy, Annex I: Tolerance limits for continuous or intermittent noise) by performing annual measurements—all of them within the limits so far. In order to reduce noise levels, noise reducers were installed in the autoclaves nitrogen discharge.

With regard to **light pollution,** only the Unified Environmental Authorization of the plant at Sevilla establishes the need to carry out periodic controls, which were not necessary in 2021. In Alestis do Brasil, the legal requirements regarding light pollution—regulation NBR 5313 on occupational risk prevention— only refer to interior lighting, and the measurements are within the limits.

According to Law 26/2007, of October 23, on **Environmental Responsibility,** its amendment of 2014 and Royal Decree 2090/2008, of December 22, by which its Partial Development Regulations are approved, the operators of the activities included in Annex III of the Law must have a financial guarantee that allows them to face the environmental responsibility inherent in the activity or activities they intend to carry out. The minimum amount to be guaranteed shall be determined by the operator according to the depth and extent of the damage their activity may cause; setting the above-mentioned amount shall be based on the environmental risk analysis (ERA, or ARM in Spanish) of their activity.

66. In 2021, work will be done to improve sorting and increase the ways in which we reuse non-hazardous waste.

The activity carried out at the plant in Vitoria is included in point 1 of Annex III of Law 26/2007 and classified as priority level 3 according to summary 24.6 of the Annex of Order ARM/1783/2011 of June 22. Hence, it is mandatory to perform an ERA to establish the need for the establishment of the above-mentioned financial guarantee before October 16, 2021, as specified in Order TEC/1023/2019, of October 10 for activities classified as priority level 3.

In compliance with this requirement, Alestis performed an ERA according to Internal Procedure SA-84.15 for the Identification, Assessment, and Registration of Environmental Aspects. It assimilated the methods of analysis contained in standard UNE150008 and the methodological guides provided by the Ministry for Ecological Transition and the Demographic Challenge into the assessment of environmental aspects associated with emergency conditions. The Ministry for Ecological Transition and the Demographic Challenge offers a tool to calculate the Environmental Damage Index (IDM in Spanish). It helps to determine the accidental baseline scenario associated with a potential release of chromium (Cr-VI) into public channels, an event that would cause damage for a value of €1,375,388.82.

According to Article 28, paragraph b) of Law 26/2007, when the repair for the damage amounts to between €300,000 and €2,000,000, if the plant has a UNE-EN ISO 14001-certified Environmental Management System, then the activity is exempt from constituting a financial guarantee, as is the case with the plant in Vitoria.

In Brazil, measures are taken to reduce the environmental risks of our operations by means of tree pruning for fire prevention, pest control and elimination of rats and other disease-spreading animals, and water tank cleaning to prevent water contamination. Additionally, the filters in the cutting and painting booths are replaced regularly, the well is cleaned routinely, a containment system was made available in the event of chemical and flammable substances leaks, class I and II waste is disposed in accordance with the law, and there is insurance for the transport of waste to the final managing agents.

Alestis has a liability policy that covers any accidental environmental incident up to €15M, including cleaning expenses where appropriate.

Alestis works to minimize the impacts of its activities, efficiently manage waste, and conserve and economize energy and other resources.



ENVIRONMENTAL MANAGEMENT

ENERGY CONSUMPTION

Concerned about climate change, Alestis has continued to implement actions to reduce energy consumption, focusing on its facilities in Seville, with measures related to lighting and air conditioning.



ENVIRONMENTAL MANAGEMENT

ENERGY CONSUMPTION

Alestis has implemented a series of general measures aimed at reducing energy costs, such as programming lighting shutdowns.

The energy consumption is shown in the following table:



67. The data for 2019 does not include office work centers, as consumption levels here are insignificant in comparison to those in the plants. However, the data for 2020 does include the electric power consumption in the offices (36,232 kWh).
68. In 2019, all natural gas consumption data is from the Vitoria plant. In 2020, the data shows the consumption from Vitoria and Tecnobahía, which was switched from propane gas to natural gas.

Given Alestis's concern about climate change, we continued to implement actions to reduce our energy consumption. The most important initiatives launched in this regard focused on the facilities in **Sevilla:**



Lighting

- Installation of energy-saving luminaires to replace inefficient ones in the new offices and the industrial area (clean room 1, storage area, new sealing area, and part of the lighting in the main warehouse.)
- Installation of motorized roller blinds programmed according to the solar orientation to make the most of natural light and effective protection of sunlight.
- Replacement of existing translucent skylights in the main warehouse with honeycomb modular polycarbonate panels, which improve use of natural light and thermal insulation.



Air conditioning

- Installation of central air-conditioning in the admin area using more efficient methods and performances by means of heat recovery systems.
- Replacement of obsolete air treatment units in Lay-up 1 room with new energy-efficient ones; installation of full digital control of the system parameters (air treatment units, cooling systems, and impulse pumps); replacement of the water pumps that manage the system with more modern and energy-efficient models.
- Installation of new windows with thermal break and double glazing featuring solar protection and low emissions to improve the current insulation in the offices.

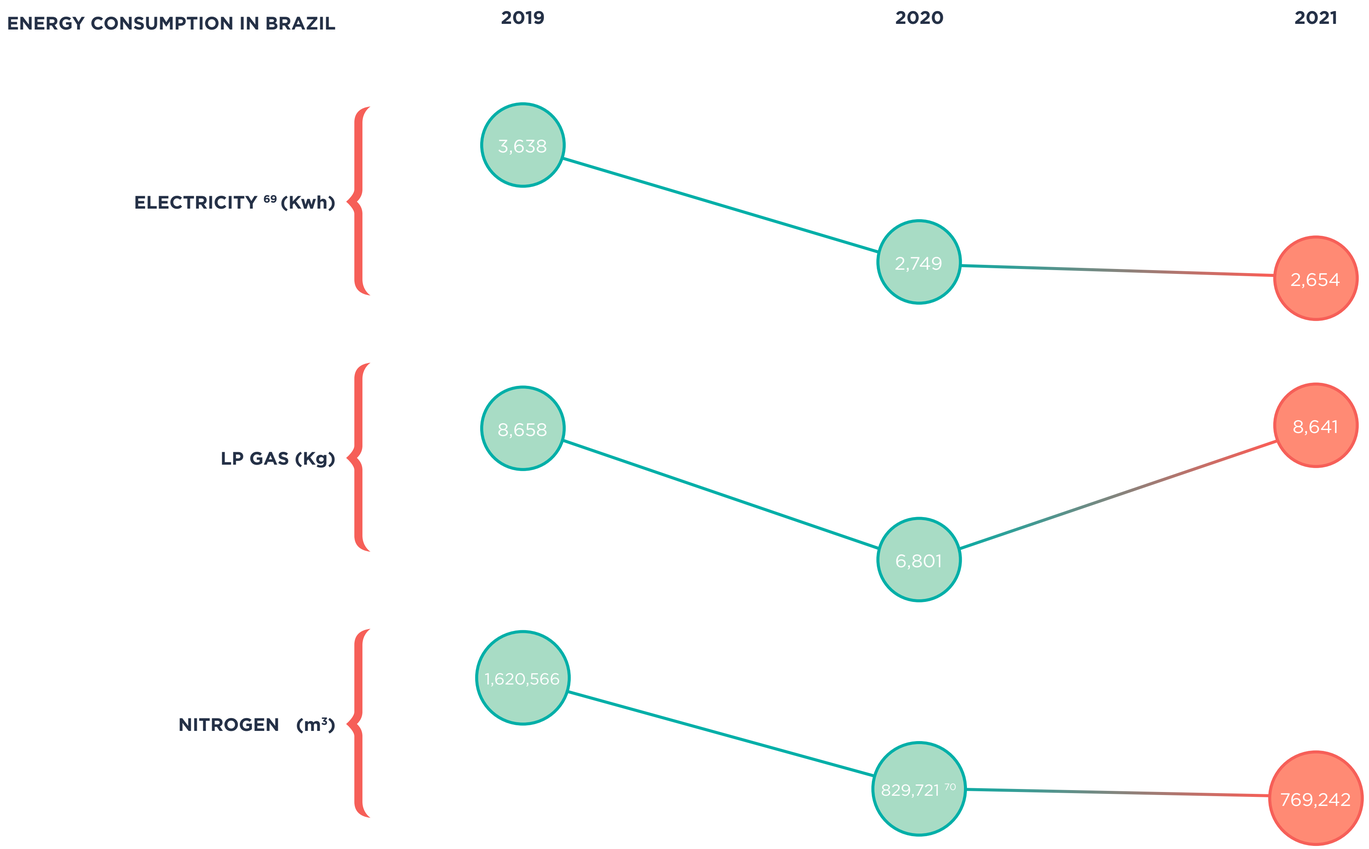
A series of **general measures** aimed at reducing energy consumption were implemented in the remaining plants:



General measures

- Installation of presence sensing devices to manage lighting in common areas.
- Auto-shutoff for lights.
- Modification of the setpoint temperature for heating and air-conditioning in the offices (19 ºC in summer and 26 ºC in winter, 66 F and 79 F, respectively).
- Maintenance of roller doors closing to the workshop to avoid wasting energy.
- Centralized management for shut-down and start-up of compressors and suction machines.
- Management of shut-down for certain machines on weekends.

The energy consumption at the Alestis do Brasil headquarters was as follows:



As it was the case the year before, all measures put in place to reduce energy consumption come down to production optimization (we went from three shifts to one shift in the plant): optimization of autoclave curing process, migration to the free energy market (renewable energy), and reduction of coating cures.

The measures implemented by Alestis to reduce energy consumption are related to production optimization.

69. 100% renewable.
70. The decrease in nitrogen consumption is directly linked to the 40% workload drop, which also led to the optimization of the curing processes by grouping program packages together. To this, we can add a decrease in manufacturing lead time, which in turn helped reduce the works in progress/finished parts.

ENVIRONMENTAL MANAGEMENT

USE OF RESOURCES & MATERIALS

Alestis performs an annual evaluation of its main raw and auxiliary material consumption through the Monitoring and Control Procedures of the Environmental Management System.



ENVIRONMENTAL MANAGEMENT

USE OF RESOURCES & MATERIALS

Alestis works in all its facilities for the reuse of paper, consolidating the use of 100% recycled paper at its facilities in Vitoria.

Thanks to the monitoring procedures for our environmental management system, we carry out annual consumption evaluations of raw and auxiliary materials.



71. The data about titanium and aluminum consumption comes from the Demand Conbid Tool, and includes both Alestis's and our supply chain's. The figures for pre-pregs come from SAP and refers to Alestis only.

Regarding the consumption of particularly hazardous substances such as those containing Cr-VI and their use in surface treatments, we still have the 4.2 m3 treatment bath for chemical conversion in Vitoria because there is no certified alternative process. However, in 2021, the consumption of Cr-VI to this end only amounted to 1 kg.

We have been trying to cut down on the use of solvents. As a result, in March 2021, following client's approval, the A220 tips (fairings) program was included in the water-based painting programs in Vitoria. The total solvent consumption reduction versus manufactured parts compared to 2020 was 28%. Likewise, following the ISO 14001 environmental management system, reducing solvent consumption was a goal for the plant in Vitoria. Although the initial target was a reduction of 5% kg/productive hour, the final result by the end of the year was even better: 9%.

In Vitoria, all the paper they use is now recycled. In the other plants, the staff were encouraged to reuse paper as draft paper. In the Alestis Sevilla plant, a "Zero Paper" initiative was introduced in the High-Performance Line area.

Alestis do Brasil also introduced initiatives to minimize consumption of raw materials in 2021. The most relevant ones were: improving shelf life of newly purchased materials (mainly chemicals), purchasing low-consumption materials (pre-preg) from distributors, and inclusion in the Exhibit-G Agreement to reduce the MOQ (Minimum Order Quantity) of the materials applicable to the Legacy Program.



ENVIRONMENTAL MANAGEMENT

WATER CONSUMPTION & DISCHARGES

Alestis promotes the reduction of the consumption of natural resources such as water, energy, CO_2, VOCs, etc.

In 2021, water consumption amounted to 29,582 m3 in Spain (25,093m3 in 2020), and 3,280 m3 in Alestis do Brasil (3,595 m3 in 2020). All water consumption comes from the water-supply system (none of the plants has a well).

Water consumption is exclusively related to the drainage, so all discharges go to the sewage network, and from there to the corresponding local sewer, except for the Vitoria plant, where there is a line of anodizing baths. When there is concentrated liquid waste that needs to be disposed of, it is removed by authorized waste managers, and never disposed of as discharge. After an internal purification process, all the other water goes to the public water domain. This is monitored by the appropriate authorities and includes regular discharge controls, as established by its Integrated Environmental Authorization.

The initiative to reduce water consumption through the filtering improvement in Tecnatom machine continued throughout 2020 at the Alestis do Brasil plant.



ENVIRONMENTAL MANAGEMENT

CARBON FOOTPRINT & OTHER ATMOSPHERIC EMISSIONS

Alestis is working to reduce greenhouse gas emissions through the efficient use of energy.



ENVIRONMENTAL MANAGEMENT

CARBON FOOTPRINT & OTHER ATMOSPHERIC EMISSIONS

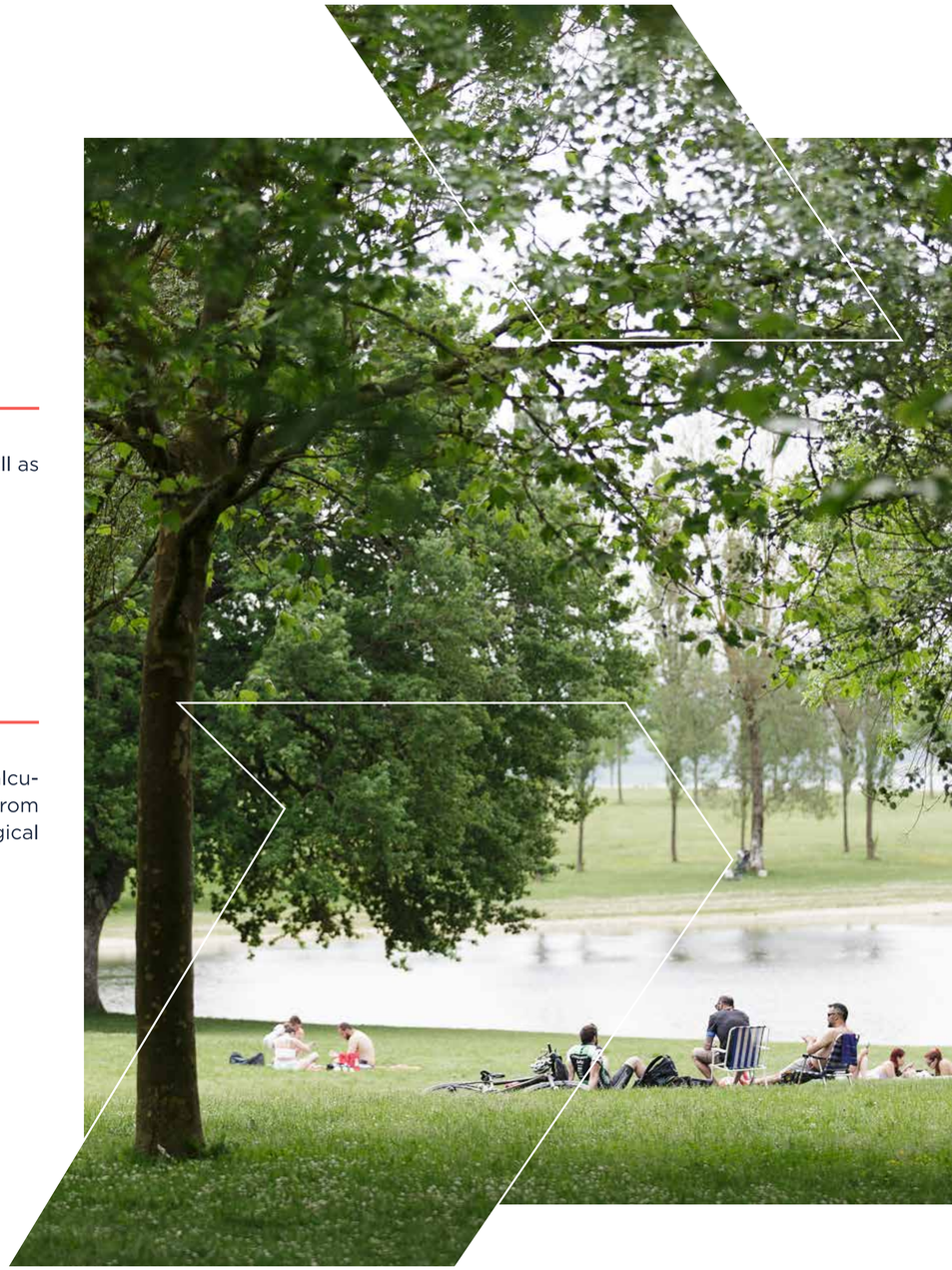
In all facilities located in Spain, Alestis performs the calculation of its carbon footprint for scopes 1 and 2:

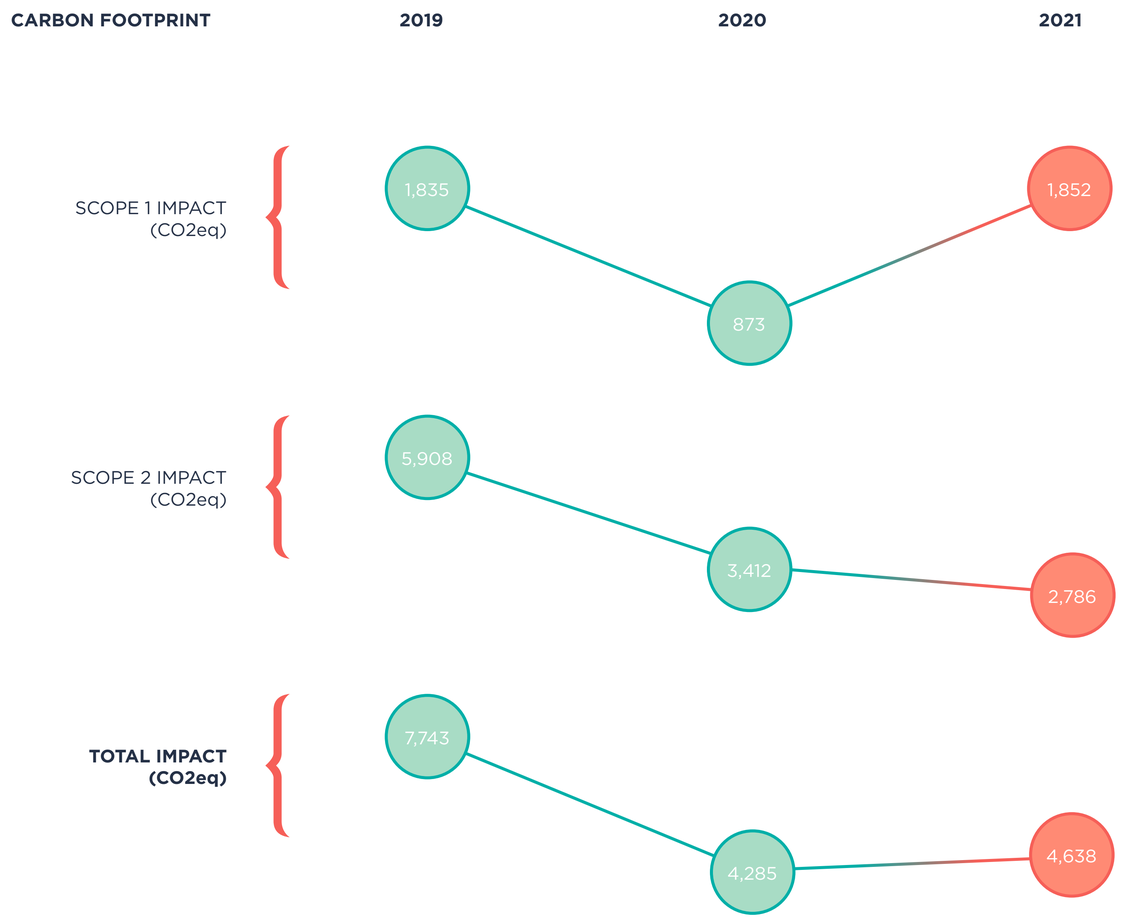
Scope 1

Linked to the consumption of propane and natural gas in boilers, as well as fugitive coolant gas emissions.

Scope 2

Indirect emissions related to electricity consumption in the facilities, calculated from the actual consumption and the emission factor obtained from the carbon footprint calculator provided by the Department for Ecological Transition and the Demographic Challenge.





72. The calculation of the carbon footprint is done using activity data for 2021 but emission factors for 2020, since the 2021 data had not been published yet when this document was being drafted. The calculation for 2021 includes wasted fluorinated gases and company cars journeys for the first time.

The measures put in place to reduce greenhouse gas emissions are the same as those already discussed regarding an efficient energy use.

We also release emissions into the atmosphere linked to painting booths and part cleaning. In order to manage them in our Spain-based plants, we follow the measures proposed by Royal Decree 117/2003 on the limitation of emissions of volatile organic compounds as a by-product of the use of solvents for certain activities.

EMISSION OF VOLATILE ORGANIC COMPOUNDS (Tm.)

PLANT	2019	2020	2021
VITORIA	13.7	6.93	5.04
SEVILLA	-	-	4.65
PUERTO REAL	-	-	12.22
TECNOBAHIA	-	-	2.74
TOTAL	**13.7**	**6.93**	**24.65**

For the calculation of the volatile organic compounds (VOCs) emissions from the plants at Sevilla, Puerto Real, and Tecnobahía, the data reported by Safetykleen regarding solvent to be recovered is taken as the starting point, and understanding that it represents 60%. All the other waste managers could not determine this value.

In Alestis do Brasil, the painting booths comply with the CONAMA Resolution on climate change.

ENVIRONMENTAL MANAGEMENT

WASTE

In 2021, Alestis's plants in Spain generated a total of 112.75 tons of hazardous waste[73] , which was sent to authorized agents for an appropriate treatment.



73. It includes 6.5 tons of carbon fiber, which has been considered hazardous even though it is classified as non-hazardous by the manager (correction made in 2022). In previous years, this type of waste was reported as solid urban waste.

HAZARDOUS WASTE (Tm.)	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
LOW 060106: OTHER ACIDS	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
LOW 070101: GLYCOL WATER	0.000	0.000	0.000	0.000	15.740	13.460	0.000	0.000	0.000	0.000	0.000	0.000	29.200
LOW 070104: OTHER ORGANIC SOLVENTS, WASHING LIQUIDS AND MOTHER LIQUORS	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.942	0.000	0.942
LOW 080111: WASTE PAINT AND VARNISH CONTAINING ORGANIC SOLVENTS OR OTHER HAZARDOUS SUBSTANCES	0.665	0.425	0.975	0.965	0.725	0.559	0.966	1.218	0.554	0.200	0.778	0.687	8.717
LOW 080113: PAINT AND VARNISH SLUDGES CONTAINING ORGANIC SOLVENTS OR OTHER HAZARDOUS SUBSTANCES	0.000	0.000	0.000	0.916	2.020	0.000	0.000	0.000	0.764	0.000	1.365	0.000	5.065
LOW 080119: AQUEOUS SUSPENSIONS CONTAINING PAINT OR VARNISH CONTAINING ORGANIC SOLVENTS OR OTHER HAZARDOUS SUBSTANCES	0.250	0.200	0.300	0.200	0.300	0.200	0.350	0.200	0.250	0.200	0.200	0.300	2.950
LOW 110113: DEGREASING WASTES CONTAINING HAZARDOUS SUBSTANCES	0.000	0.000	0.000	0.000	0.000	0.050	0.000	0.000	0.000	0.000	0.000	0.011	0.061
LOW 080409: SEALANTS AND GLUES	0.000	0.000	0.000	0.000	10.220	0.000	0.000	0.000	0.000	0.000	0.000	0.000	10.220
LOW 120118: CONTAMINATED CHIPS AND SHAVINGS	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.047	0.000	0.000	0.000	0.047
LOW 130205: MINERAL-BASED NON-CHLORINATED ENGINE, GEAR AND LUBRICATING OILS	0.000	0.000	0.000	0.000	0.000	0.000	0.005	0.000	0.000	0.000	0.000	0.000	0.005
LOW 130207: WATER CONTAINING HYDROCARBONS	0.000	0.000	0.000	0.000	0.000	0.000	0.314	0.000	0.000	0.000	0.000	0.000	0.314
LOW 140603: OTHER SOLVENTS AND SOLVENT MIXTURES	0.000	0.000	0.000	0.000	0.005	0.039	0.000	0.130	0.000	0.000	0.080	0.002	0.256
LOW 150110: PACKAGING CONTAINING RESIDUES OF OR CONTAMINATED BY HAZARDOUS SUBSTANCES	1.622	0.840	2.202	0.655	2.315	0.937	1.597	0.905	0.741	1.260	1.534	1.151	15.759
LOW 150111: METALLIC PACKAGING CONTAINING A HAZARDOUS SOLID POROUS MATRIX, INCLUDING EMPTY PRESSURE CONTAINERS	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
LOW 150202: ABSORBENTS, FILTER MATERIALS (INCLUDING OIL FILTERS NOT OTHERWISE SPECIFIED), WIPING CLOTHS, PROTECTIVE CLOTHING CONTAMINATED BY HAZARDOUS SUBSTANCES	2.490	1.040	2.895	2.091	6.667	2.647	2.923	0.785	1.632	2.520	2.837	2.851	31.378
LOW 160107: OIL FILTERS	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
LOW 160507: DISCARDED INORGANIC CHEMICALS CONSISTING OF OR CONTAINING HAZARDOUS SUBSTANCES	0.000	0.000	0.000	0.000	0.030	0.000	0.000	0.000	0.000	0.000	0.283	0.000	0.313
LOW 160603: MERCURY-CONTAINING BATTERIES	0.000	0.000	0.000	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.001
LOW 190813: SLUDGES CONTAINING HAZARDOUS SUBSTANCES FROM OTHER TREATMENT OF INDUSTRIAL WASTE WATER	0.000	0.000	0.000	0.000	0.142	0.000	0.000	0.000	0.000	0.000	0.247	0.000	0.389
LOW 190904: SPENT ACTIVATED CARBON	0.000	0.000	0.000	0.000	0.214	0.000	0.000	0.000	0.000	0.000	0.214	0.000	0.428
LOW 200121: FLUORESCENT TUBES AND OTHER MERCURY-CONTAINING WASTE	0.000	0.000	0.000	0.007	0.000	0.010	0.000	0.000	0.084	0.000	0.000	0.000	0.101
LOW 200135: DISCARDED ELECTRICAL AND ELECTRONIC EQUIPMENT OTHER THAN THOSE MENTIONED IN 20 01 21 AND 20 01 23 CONTAINING HAZARDOUS COMPONENTS	0.000	0.000	0.000	0.000	0.000	0.109	0.000	0.000	0.000	0.000	0.000	0.000	0.109
LOW 070214: CARBON FIBER WASTE	0.000	0.000	2.600	0.000	0.000	1.680	0.000	0.000	0.000	2.220	0.000	0.000	6.500
TOTAL	**5.027**	**2.505**	**6.372**	**4.835**	**38.378**	**18.011**	**6.155**	**3.238**	**4.072**	**4.180**	**8.480**	**5.002**	112.755

In 2021, Alestis's plants in Spain generated a total of 112.75 tons of hazardous waste , which was sent to authorized agents for an appropriate treatment.

This hazardous waste is accompanied by an emergency action plan form. Every year, we provide the Administration with a document that shows the volume managed and the authorized agent who collected it.

The non-hazardous waste generated amounted to 329.02 tons.

We strive to steadily improve the ways we sort and manage hazardous and regular waste in all our plants by implementing a selective collection of waste by both authorized waste managers and cleaning service providers, placing separate ecological collection points, and reorganizing hazardous waste containers. The external storage areas for hazardous and non-hazardous waste are prepared to make waste easier to sort and handle. Also, workers are provided with written and visual information for proper waste sorting.

The sorting is also carried out in the so-called "office rooms", where organic compostable waste from food is separated from the rest (plastics and cardboard). However, food waste production at Alestis's facilities is limited to the food employees bring from home, for there are no cafeterias or dining areas.

In Alestis do Brasil, all industrial waste is conveniently sorted in color-coded bins according to their nature, and sent to the Internal Waste Center, where it is separated and prepared to be compressed and loaded. It is then taken to managing agents who check it, weigh it, and dispose of it following the most appropriate treatment according to the type of waste. In 2021, we continued looking for new managing agents who could improve the final treatment at more competitive rates.

In this case, there is a dining service. In fact, the contract with the company responsible for providing this service includes actions aimed at minimizing food waste.

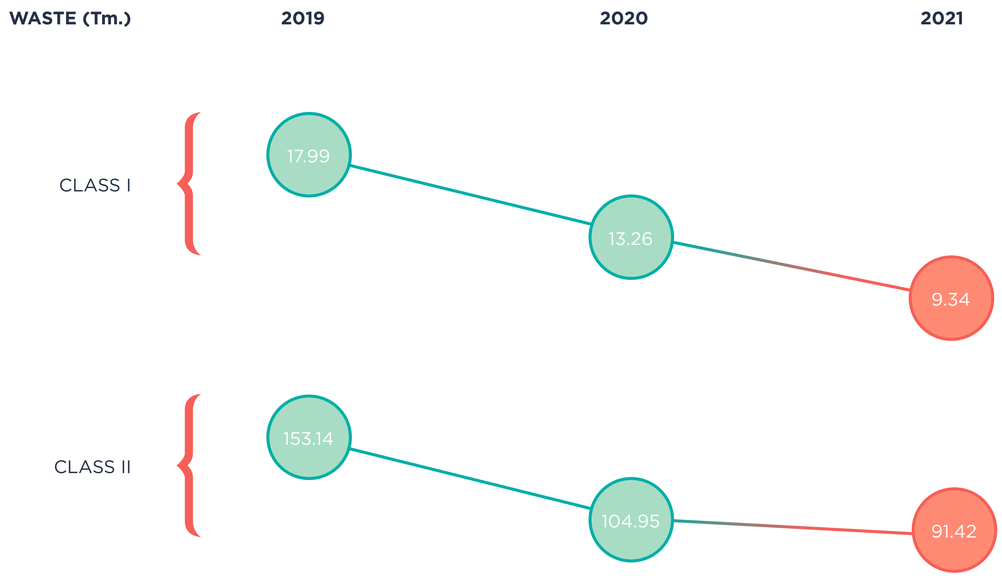
NON-HAZARDOUS WASTE (Kg.)	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
CARDBOARD	0	5,160	5,400	11,800	1,040	1,160	2,781	1,590	2,780	2,740	400	3,440	38,291
SCRAP METAL	2,000	7,060	1,380	2,020	27,815	9,553	1,980	1,140	5,420	1,130	6,060	8,560	74,118
WOOD	2,600	0	1,060	2,020	1,120	5,940	10,170	2,120	4,200	5,740	2,360	1,280	38,610
PLASTIC	5,020	1,580	2,740	0	2,520	0	2,540	2,300	2,260	2,580	0	3,280	24,820
WASTE (SIMILAR TO SOLID URBAN WASTE)	5,840	14,680	10,980	9,300	6,760	8,400	10,000	14,000	8,860	6,620	9,220	6,740	111,400
BULKY WASTE	0	0	6,800	7,660	11,760	0	3,630	0	6,850	0	2,980	2,100	41,780
OTHER	0	0	0	441	0	48	10	0	0	0	0	0	499
TOTAL	**15,460**	**28,480**	**28,360**	**32,800**	**51,015**	**25,053**	**31,101**	**21,150**	**30,370**	**18,810**	**21,020**	**25,400**	329,019

In Alestis do Brasil, all industrial waste is conveniently sorted in color-coded bins according to their nature, and sent to the Internal Waste Center, where it is separated and prepared to be compressed and loaded.

Hazardous waste is shipped with an emergency form, which contains all the details on composition and reactivity, and vehicles set up with containment equipment, emergency treatments, and telephone numbers for contacting environmental emergency centers. They have waste disposal certificates specifying the final destination and treatment of the waste and issued by the managing agents, all licensed by CETESB, a state environmental agency.

Class II non-inert waste is sent to the ENGEP unit (an industrial landfill), while Class I waste is sent to the RECINTEC unit for recycling and/or co-processing. This full process complies with all national environmental regulations in force as per the CONAMA Resolution, as well as with other treaties like the Montreal Protocol.

Alestis has actively participated in the committee for the minimization of waste in the aeronautical industry, launched by the Andalusian Regional Government in 2016.



Since the beginning of 2016, Alestis has actively participated in the committee for the minimization of waste in the aeronautical industry, launched by the Andalusian Regional Government under the provisions of the Plan for the Prevention and Management of Hazardous Waste of Andalusia for the 2012-2020 period.

ENVIRONMENTAL MANAGEMENT

BIODIVERSITY

Alestis takes into account the protection of biodiversity within the context analysis of all plants in Spain, as established in its Environmental Management System ISO 14001:2015.



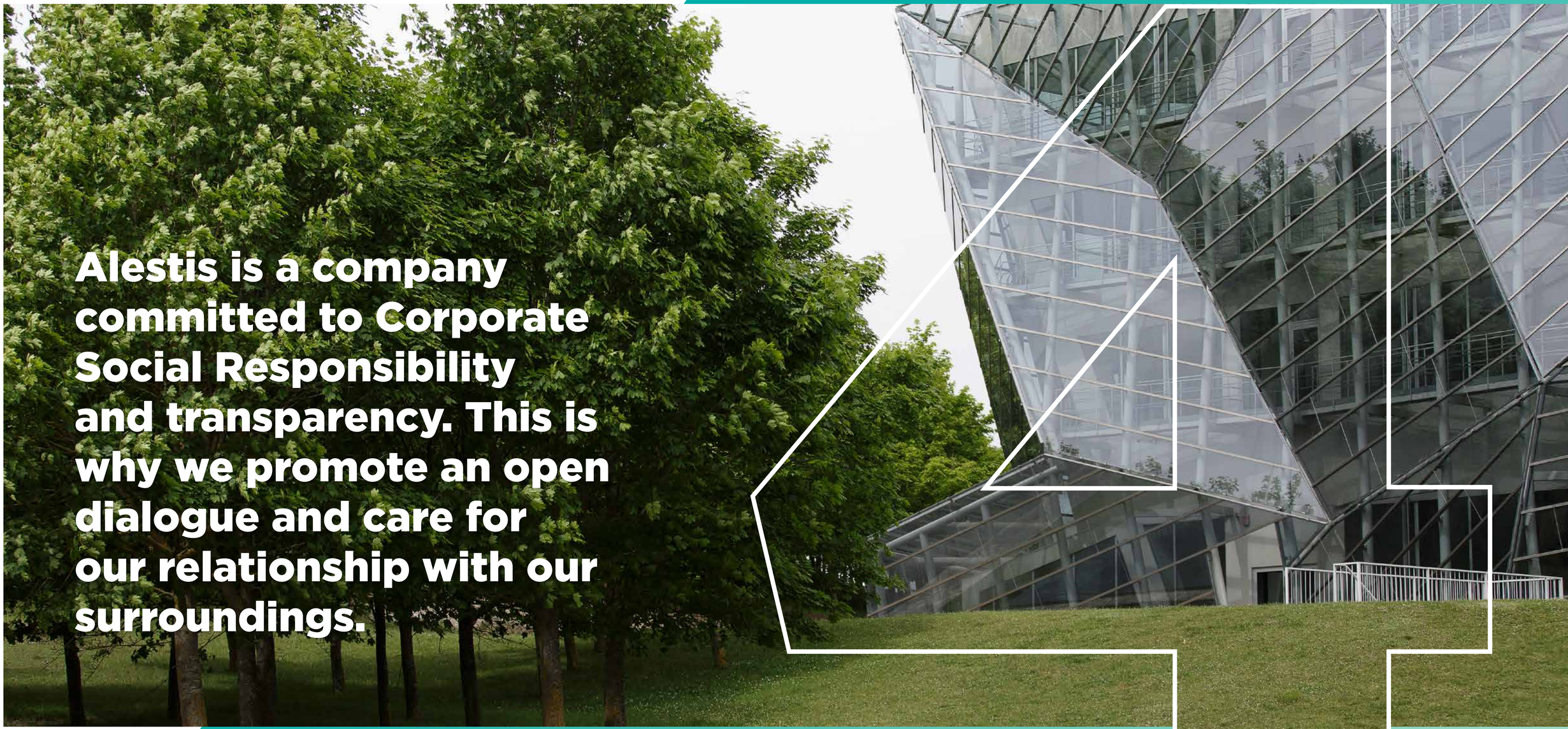
Alestis takes into account the protection of biodiversity within the context analysis of all plants in Spain, as established in its Environmental Management System ISO 14001:2015.

This is particularly relevant in the case of Puerto Real, since this plant is located near the Isla de Trocadero Natural Park. These marshes, which are part of the Bahía de Cádiz Natural Park, are home to communities of crustaceans, mollusks, fish, and birds with a very high ecological and naturalistic value.

Although the activities carried out at the plant in Puerto Real are not among the most potentially polluting, we comply strictly with the regulations to ensure that our industrial activities have no impact on the surrounding biodiversity.

The Alestis do Brasil plant is located within an area classified as “predominantly industrial area”, so there is no risk to biodiversity.

PARTNERS


Alestis is a company committed to Corporate Social Responsibility and transparency. This is why we promote an open dialogue and care for our relationship with our surroundings.

PARTNERS

PROFESSIONAL ORGANIZATIONS

Alestis is a member of several professional organizations in Spain, with which it cooperates in initiatives and activities to promote the sector, develop strategic plans, exchange good practices and the promotion of training.



PARTNERS

PROFESSIONAL ORGANIZATIONS

Alestis is not an isolated entity, it exists in an environment which it depends and which it influences on a daily basis. In the permanent search to create value, it plans and executes actions with a positive impact on the community.

Alestis is a member of several Spanish professional organizations with which we collaborate to launch initiatives and activities to raise awareness about our industry, develop strategic plans, exchange advice on best practices, and promote professional training.

ALESTIS SPAIN	ANDALUCÍA AEROSPACE (ANDALUSIA'S AEROSPACE CLUSTER) ASOCIACIÓN ESPAÑOLA PARA LA CALIDAD (AEC) (SPANISH ASSOCIATION FOR QUALITY) ASOCIACIÓN ESPAÑOLA DE MATERIALES COMPUESTOS (AEMAC) (SPANISH ASSOCIATION OF COMPOSITE MATERIALS) SPACE (SUPPLY CHAIN PROGRESS TOWARD AERONAUTICAL COMMUNITY EXCELLENCE) SEVILLA ES INDUSTRIA FEMCA (FEDERATION OF METAL ENTREPRENEURS OF CÁDIZ)
ALESTIS DO BRASIL	FIESP (FEDERATION OF INDUSTRIES OF THE STATE OF SAO PAULO)

PARTNERS

SOCIAL ACTION

The company bases its social action on the care of its relationships for and with the community, among which are non-governmental organizations, associations and foundations, knowledge institutions.

At Alestis, there are internal stakeholders such as partners, managers or employees, and external stakeholders, e.g. clients, supply chain, community. The company focuses its social action on nurturing its relations with the community: non-governmental organizations, associations and foundations, educational institutions, etc.

In 2021, we launched different actions to improve the living conditions of employees and the social environment in which the company operates; namely:



Plan Sumamos

Alestis is a pioneer company in Andalusia regarding vaccination against COVID-19—together with CEA (Andalusian Entrepreneurs Confederation), CEOE (Spanish Confederation of Business Organizations), the Andalusian Department of Health and Families, and the Andalucía Aerospace cluster, we launched a vaccination campaign for our staff, as well as employees from other companies in the aerospace sector organized in collaboration. This campaign was run in different stages in three vaccination centers: the first day takes place in Alestis Sevilla, the second day at the Business Center of the Parque Aeronáutico Aerópolis, and a third day at Alestis Puerto Real in Cádiz. Through this initiative, Alestis showed its commitment to health and prevention during the pandemic by collaborating with the health authorities.



Blood Donation Campaign

Alestis Sevilla organized a blood donation campaign in collaboration with Centro de Transfusión Sanguínea in Sevilla, which belongs to the Andalusian Health Service (SAS in Spanish). A total of 40 employees got involved. These donations helped save lives and improve the health of people in need.

Communication with stakeholders takes place through the channels and interlocutors shown in the following table:

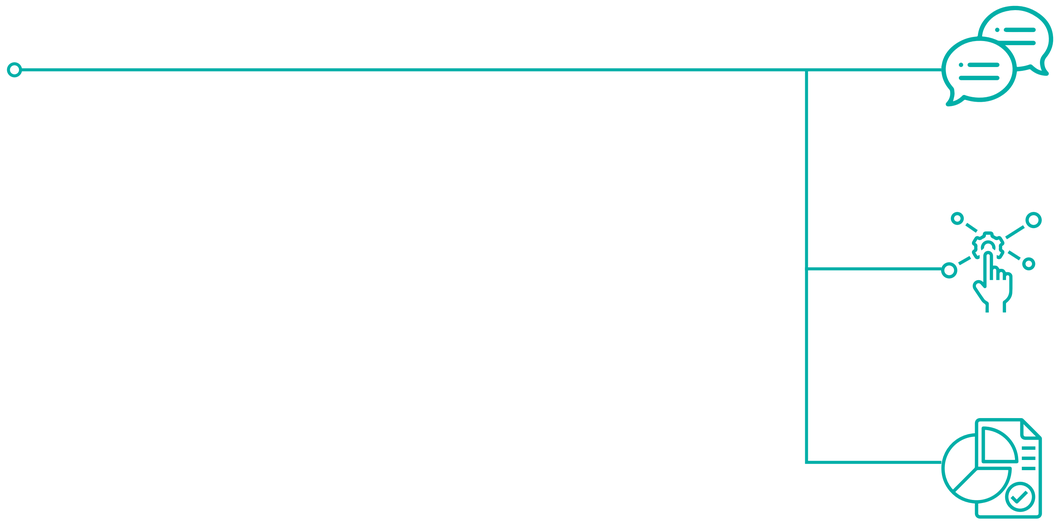
Stakeholders	Communication channels	Interlocutors
SHAREHOLDERS	Digital newsletter (brief news) Internal and management announcements E-mail Follow-up meetings Corporate website Social media Sustainability report	General Management Corporate Management Secretary of the Board of Directors
STAFF	Intranet Digital newsletter (brief news) Internal and management announcements Bulletin boards Screens featuring internal news Handbook Meetings with trade union representatives E-mail Regular meetings Corporate website Social media Sustainability report Pop-ups	HR Management HR at each plant Head of Communications Chain of command General Management
CLIENTS	Communications from the Business Strategy Management Regular meetings and communications Trade fairs and business meet-ups Visits to the facilities Involvement in industry associations Corporate website Social media Sustainability report	Focal Point Program Program Officer and Business Development Sales Industrial Operations Quality Assurance

Stakeholders	Communication channels	Interlocutors
SUPPLY CHAIN	Communications from the Procurement and Supply chain departments Regular meetings and communications Supplier portal Trade fairs and business meet-ups Visits to the facilities Involvement in industry associations Corporate website Social media Sustainability report	Procurement Logistics and General Procurement Supply Chain Management Team Supplier Industrialization Supplier Engineering Supplier Quality Assurance
INDUSTRY ASSOCIATIONS AND OTHER PROFESSIONAL ASSOCIATIONS	Association forums Regular communications Trade fairs and business meet-ups Corporate website Social media Sustainability report	General Management Head of Communications Corporate Management Sales HR Management Procurement Legal
SOCIAL ENVIRONMENT	Digital communications Institutional meetings Press releases in the media Collaboration agreements Visits to the facilities Corporate website Social media Sustainability report	HR Management HR at each plant Head of Communications Legal ORP and Environment

Alestis holds an active dialog and is open to cooperation with its stakeholders, among others, through social actions as the ones described below.

To decide the recipients of our social initiatives, we try to prioritize local entities in the locations where we are present. This aims to improve the quality of life of the people in the communities.

According to Alestis's Code of Ethics, this is done through ethical business practices and relationship management with these stakeholders based on three pillars:



Dialogue

Maintaining an appropriate dialogue with the most relevant stakeholders (foundations and NGOs, local governments and institutions, training centers, etc.) in order to know their expectations, and identify aspects to be improved by mutual agreement.

Social action

Promoting different initiatives to strengthen their positive impact by establishing partnerships with organizations both through economic contributions and dissemination of knowledge in forums, participation in working groups, etc.

Social analysis

The implementation of the projects leads to positive and negative social impact on the environment. The company manages this impact by identifying its potential consequences and defining actions to maximize the positive effects and reduce or eliminate the negative ones.

Alestis maintains an active dialogue and cooperation channels with its stakeholders through social actions.

In 2021, a total of €480 were spent on social action projects. We collaborated with Fundación Pequeño Deseo and the religious congregation Congregación Filipense Hijas de María Dolorosa in the 7th edition of the Draw their Christmas contest. All these activities took place in Spain.



PARTNERS

DEVELOPMENT IN THE LOCAL COMMUNITIES

Alestis' commitment to society is materialized in the development and promotion of initiatives focused on improving the quality of life of the people in the communities where it operates.



PARTNERS

DEVELOPMENT IN THE LOCAL COMMUNITIES

During 2021, specific social actions have been developed, as well as collaborations with institutions, within training, business associations and the aeronautical sector.

Our commitment to society is reflected in the development and promotion of initiatives aimed at improving the quality of life of the communities where we work. We help by means of sponsorships and subsidies, among others.

In 2021, specific social actions took place, as well as collaborations with institutions within the areas of training, business associations, and the aeronautical sector. Below are some of the highlights:

- **Online participation in forums, activities, and meetings** organized by industry associations such as Andalucía Aerospace and SPACE. As for SPACE, we started a partnership in 2021 to develop a training called "5S and Visual Management", provided by Alestis.
- **Dissemination of information to the media** by means of press releases.
- **Collaboration with the town council in Puerto Real** (Cádiz) - we donated candy for the Three Wise Men float parade at Christmas.

Despite the pandemic, in 2021 there were five appointments in Alestis. All five hires were managed in alignment with the company's key strategies, above all, with the constant search for specialized workers.

Except for those materials we purchase abroad for technical reasons, we try to work with suppliers and service providers within the community to help develop the local economies.

In Brazil, based on the requirements of Brazilian labor laws, Alestis do Brasil collaborates with FUNDHAS, local foundation and largest social action in São José dos Campos, to select and hire low-income students from a state school in the city and run continuing education and employability projects to help them. These students have placements in Alestis do Brasil, where they have an opportunity to learn a new job. Likewise, we stay in touch with neighboring companies to mitigate any negative impact derived from our business.

PARTNERS

CULTURAL ACTIVITIES

Alestis has collaboration agreements with educational institutions and takes part in projects and training programs that generate knowledge and innovation.



PARTNERS

CULTURAL ACTIVITIES

Alestis makes donations and sponsorships as part of the CSR exercise.

Alestis has collaboration agreements with educational institutions and takes part in projects and training programs that generate knowledge and innovation.

In 2021, we continued collaborating with the University of Cádiz, which offers an **MA in Nanoscience and Technologies** specialized in materials and their use in advanced manufacturing technologies for the aerospace industry. Alestis participates in specific training modules and as a potential company for students to complete their internship.

As part of its CSR, Alestis makes donations and provides sponsorships, in strict application of the procedure approved by the Alestis Board of Directors on December 10, 2016. These are always intended to align with the strategic pillars we have defined: Community & Education, Aerospace Sector or Science, Innovation & R&T.

In 2021 Alestis continued its collaboration with vulnerable people and donated €10 for each submitted drawing to the religious congregation Congregación Filipense Hijas de María Dolorosa, which among other things, is responsible for the distribution of food to vulnerable families. We received a total of 39 Christmas cards, which translated into €390 donated to the kitchen soups run by the Congregación Religiosas Filipenses de Sevilla.

Additionally, in the 2021 edition, the company also collaborated with the Foundation Pequeño Deseo by purchasing 45 glitter sticks from its solidarity shop—worth €90 (€2 each)—which were given to each of the children who took part in the drawing contest.



Draw their Christmas contest (7th edition)

Since 2015, we have asked employees' children aged 3 through 14 to submit drawings to be shown on Alestis's corporate Christmas cards.

COMPLIANCE


At Alestis, Ethics & Compliance is seen as an opportunity to build a successful and sustainable company.

COMPLIANCE

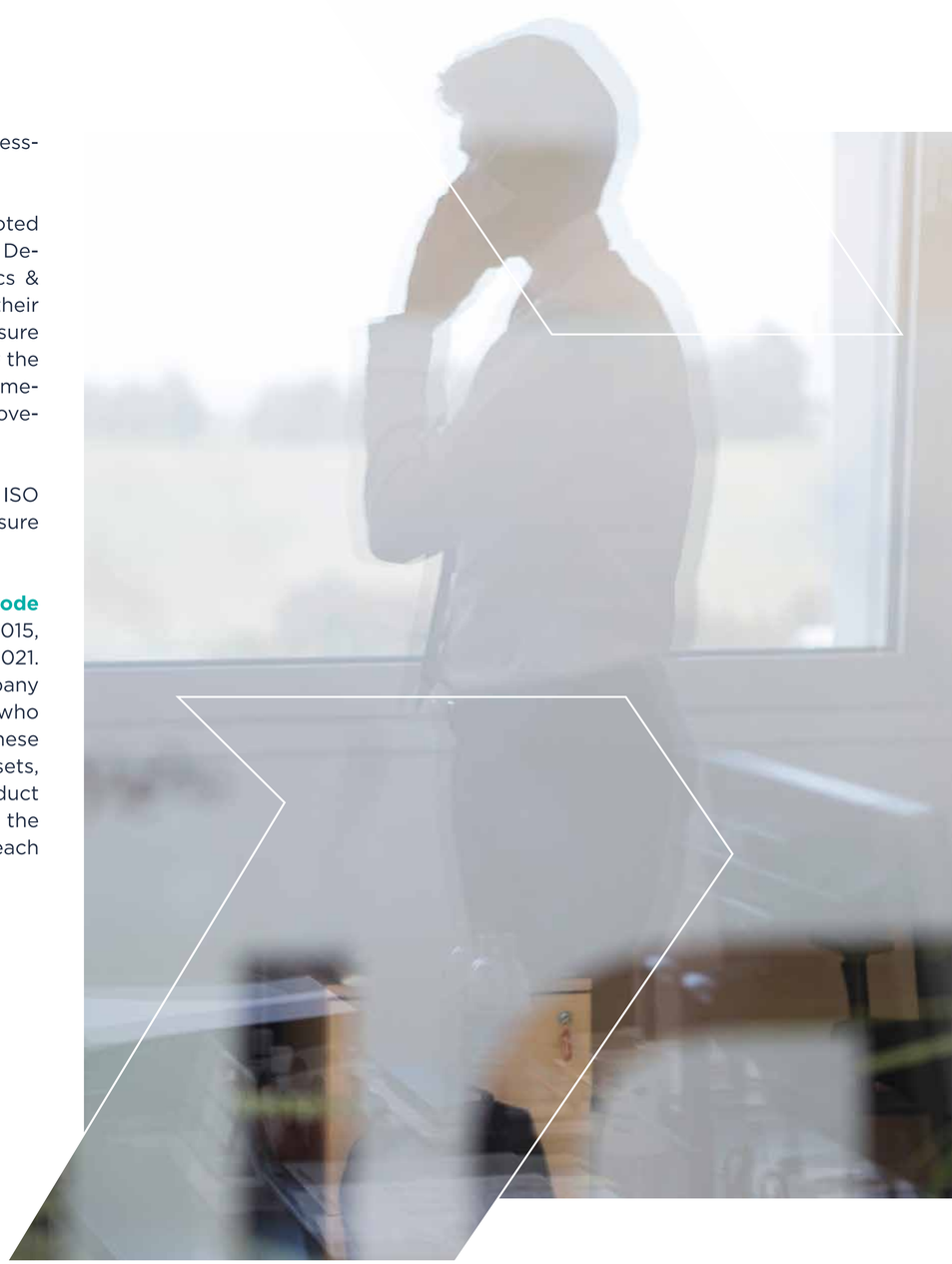
The organization has a Compliance Management System, promoted by its Board of Directors and led by the Ethics and Compliance Area.

At Alestis, Ethics & Compliance is seen as an opportunity to build a successful and sustainable company.

We have a **Compliance Management System** (SGC in Spanish), promoted by our Board of Directors and led by the Legal, Ethics & Compliance Department. By implementing this system, our aim is to integrate Ethics & Compliance into existing management processes and, as a result, into their operational requirements and procedures. The ultimate goal is to ensure compliance with the (legal and voluntary) obligations to be followed by the company, to detect and prevent risks and possible breaches, to adopt measures that help minimize such risks, and to facilitate continuous improvement.

The Compliance Management System was drafted in accordance with ISO 19600 and UNE 19601 standards, as stipulated in the Alestis Code, to ensure they are aligned with the company's values.

The cornerstone of the Compliance Management System is **Alestis's Code of Ethics.** Originally approved by the Board of Directors on June 30, 2015, it was fully revised and approved by the same Board on November 18, 2021. This Code specifies the mission, vision and values that govern the company and that allow to guide the action guidelines and conduct of all those who make up Alestis. It also specifies the principles of conduct that guide these values regarding all areas: people, business, tangible and intangible assets, and the environment. Along with these principles, it describes the conduct expected from all employees, regardless of their role and location, in the event of an incident, as well as the consequences associated with a breach of the Code.



The Compliance Management System is also governed by **the Ethics and Compliance Policy (E&C),** approved by the CEO in 2015 and updated on the same date as the Code: November 18, 2021. The Policy gathers all related essential principles, all key in the development and execution of the processes, procedures, and instructions that make up this management system and that apply to the whole company, as well as the values that the organization has taken as its own.

There is also a **Human Rights Sub-policy,** which formalizes and reflects Alestis's commitment to labor and non-labor human rights, recognized nationally and internationally. This Sub-policy takes the following documents as a reference: the International Bill of Human Rights, the Fundamental Conventions of the International Labour Organization, the United Nations Global Compact, and the European Convention on Human Rights.

Supervision, monitoring, and auditing are also key for assessing how effective the established controls or actions are, mitigating risks, and rectifying potential non-compliance situations.

In order to further develop and explain specific subject areas, the organization created guidelines and procedures aimed at making them easier to understand and assimilate by the stakeholders. These include: Conflict of Interest Guide, In situ Recruitment Guide, Training and Seminar Guide, Gift and Hospitality Guide, Sponsorship and Donation Procedure, and Export Compliance Procedure

Alestis do Brasil is included in the scope of application of the Code of Ethics, the Ethics & Compliance Policy, and the procedure of giving and receiving gifts and hospitality. However, due to the pandemic, all the training had to be canceled again in 2021.

In addition, Alestis has a **Crime Prevention Model** (MPD in Spanish), approved by the Board of Directors in 2016 and integrated in the Crime Prevention Manual. This organizational and management model includes appropriate monitoring and control measures to prevent crime or significantly reduce its likelihood.
To ensure the effectiveness of the Compliance Management System, we have a biennial plan in place to disseminate and offer training in the different subjects. In 2021, we conducted specific data security training to raise awareness among key staff in different departments of the importance of maintaining an adequate level of internal and external data protection. The training provided key concepts to enable each data owner or holder to determine the level of confidentiality of the information and, therefore, the best way to process it. It was offered to 32 people, and 24 ended up doing the training.

Every year, the Steering Committee includes specific objectives for the development, implementation and consolidation of the Compliance Management System as part of the company's essential or strategic goals.

Alestis has a **Channel for Complaints** (https://alestiscd.globalsuitesolutions.com/alestis) available to employees, managers and third parties through a link on the Intranet or through the corporate website. There is also a contacts network available in all plants and published on the Intranet. These can be used to report identified risks and potential breaches, and to propose opportunities for improvement via eyc@alestis.aero.

The system is based on a method that processes all communications; its aim is to ensure timely management and response to every case. The **protocol of non-retaliation** ensures protection for whistle blowers, as well as confidentiality. It also establishes the necessary measures to discourage malicious or abusive complaints and to prevent unjustified reputational harm.

Alestis has a Human Rights Sub-Policy, which formalizes the company's position in relation to its commitment to labor and non-labor Human Rights, recognized nationally and internationally.

According to the Crime Prevention Manual, the complaint is received exclusively by the members of the Ethics & Compliance Department, and it triggers one of two procedures:

1. The "crime-handling procedure", if there is suspicion or news of a crime with possible criminal responsibility for the legal person, or if there is a serious non-compliance event with possible criminal implications in the Compliance Systems.

2. The "concern-handling procedure", used in all the other scenarios.

In 2021, a total of 7 complaints (one of them was anonymous, but it was not processed because it failed to meet the necessary requirements) and 32 inquiries (both ex officio and at the party's request) were processed. In no case did the complaints involve criminal responsibility for the legal person or were they related to human rights.



COMPLIANCE

ANTI-CORRUPTION & ANTI-BRIBERY STRATEGIES

Alestis does not tolerate that any member of the company promises or offers an unjustified benefit or advantage to a third party, regardless of whether the third party is a private individual, civil servant or public authority.



COMPLIANCE

ANTI-CORRUPTION & ANTI-BRIBERY STRATEGIES

Alestis' contributions to foundations and/or non-profit entities, as well as any donation or donation, are governed by the Sponsorship and Donations Procedure.

Alestis is particularly sensitive to corruption, both public and private, and strives to combat it. As a result, the **Alestis Code** has a specific section on this subject, which states that the company will not tolerate any conduct that illegally favors someone who has received or requested any unwarranted benefit or special treatment. Likewise, company members are not allowed to promise or offer an unwarranted benefit or advantage to a third party, regardless of their status: a private individual, an official, or a public authority.

We created a **Gift and Hospitality Guide,** aimed at avoiding courtesies that may appear to be inappropriate. All gifts offered to or accepted by our employees must occur in a normal business context, without influencing or appearing to influence, on any company decision. To support this, there is a €50-cap on any gift, whether given or received, and express approval from the Ethics & Compliance Department is required if the gift exceeds this amount.

Regarding conflicts of interest, we have a **Conflict of Interest Management Procedure,** which aims at identifying and managing any situation in which such conflict may exist, and promotes the mechanisms to resolve it. This procedure is intended to ensure the objectivity and impartiality required to solve these cases, and help identify and communicate potential conflict situations. Any member of the staff who is aware of a possible conflict of interest must communicate it to the Ethics & Compliance Department. A total of 7 statements were compiled in 2021. In addition to all this, Alestis employees have access to a Conflict of Interest Guide so they can find all the key information.

With regard to donations, liberalities, and contributions to foundations and/or nonprofit institutions, they are all subject to the **Donations and Sponsorship Procedure,** which aims to ensure a consistent and transparent approach to these actions, as well as compliance with the law and ethical principles. This document states that Alestis will not make donations or offer sponsorships to political parties. Any action involving donations or sponsorships will have to be approved by the following departments: Communications, Legal, Ethics & Compliance, and General Management.

The risk of bribery or influence peddling in the relationships with public officials or authorities was mitigated by supervising those employees who interact with them and providing specific training. Also, we substantially limited delegation of authority and subjected it to Alestis's **Delegation of Authority Standard,** while also implementing financial control measures included in the Finance Procedure.

As for the **fight against money laundering and financing of terrorism,** the Alestis Code includes the rejection of any property coming from criminal activity. Everyone must inform the Ethics & Compliance Department if they suspect of the origin of a particular good.

In addition, the Crime Prevention Model includes the fight against money laundering, corruption, and bribery, and all the policies available as control mechanisms, and general conduct principles to avoid or minimize the risk of engaging in such behavior. With regard to the criminal risk map currently in force, the residual risk of each of the crimes applicable to the company (including the fight against corruption and money laundering) remains at a score of less than 5 on a scale of 1 to 45. Given the lack of criminal risks, there was no need to update the above-mentioned map.

All contracts entered into by Alestis with suppliers and subcontractors include the following anti-corruption clause, in which the Supplier declares that *"they comply with and shall continue to comply during the term of this Agreement and any other business relationship between the two, with the anti-corruption and anti-money laundering regulations to the extent that they apply to the obligations and activities assumed by each of them."* They also declare *"not having offered or received illegal payments"* and not having engaged in or permitted any fraud or deceptive practices.

In Brazil, guidelines for combating corruption, bribery, and money laundering are included in E&C training and in policies such as SE 8503 (Risk Management).

All Alestis' contracts with its suppliers and subcontractors include an anti-corruption clause.



ABOUT THIS REPORT



Alestis maintains its commitment to publish its Sustainability Report on an annual basis.

ABOUT THIS REPORT

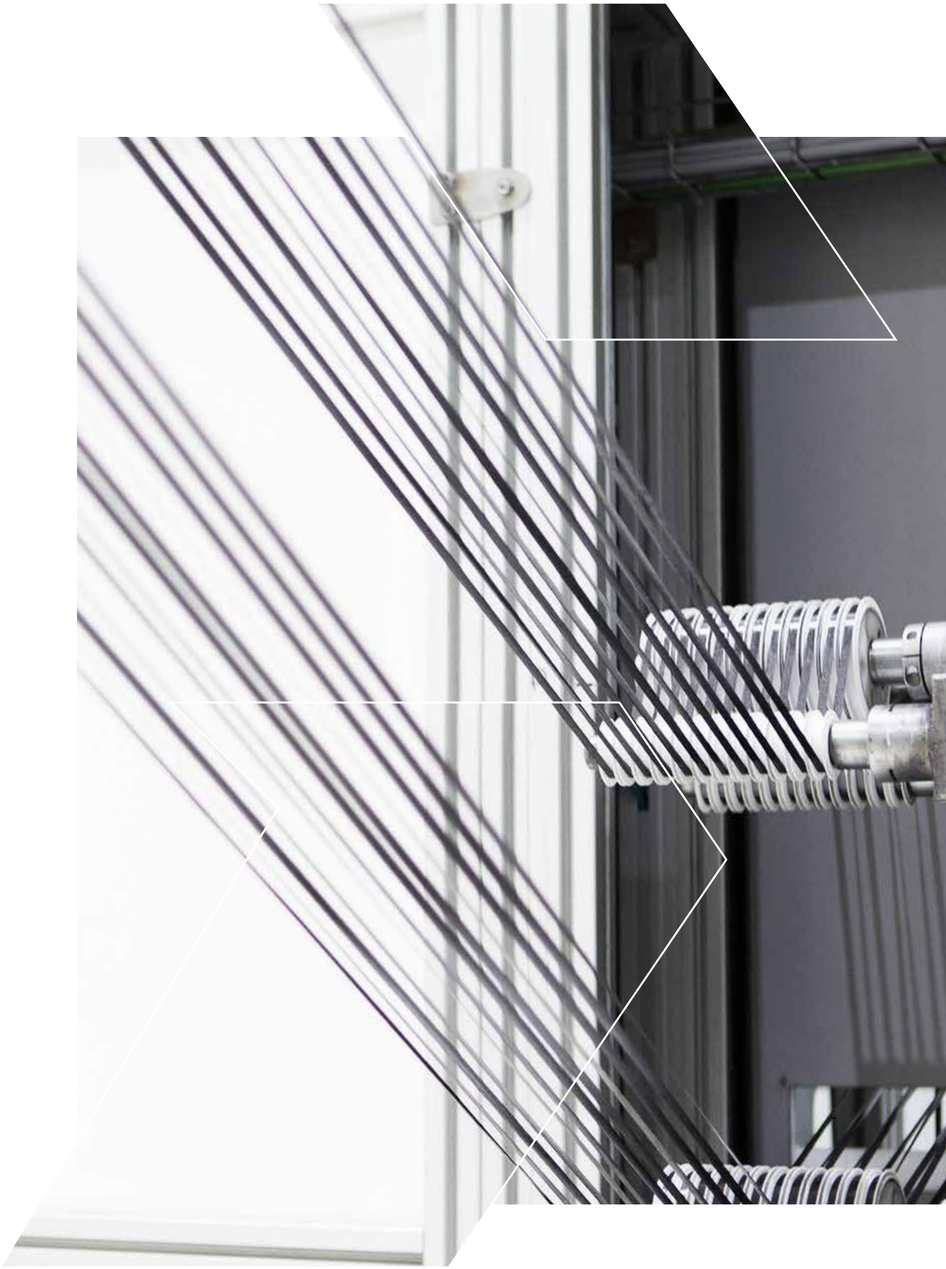
Alestis's 2021 Non-Financial Report includes the organization's economic, environmental, and social performance, as well as its ethical and business commitments, and the results achieved during the period from January 1, 2021 to December 31, 2021.

Alestis is committed to publish its Non-Financial Report annually. It is the fourth one to be published, after the 2018 and 2019 versions.
[102-54] The content is based on the provisions under Law 11/2018, of December 28, an amendment to the Code of Commerce. This revised text of the Capital Corporations Act was approved by Royal Legislative Decree 1/2010, of July 2, and Law 22/2015, of July 20, on accounts auditing regarding non-financial information and diversity. The data presented have been drawn up for accuracy, balance, transparency, comparability, reliability, and timeliness.

The contents of this report have been selected based on the stakeholders' principles of inclusion, sustainability context, materiality and thoroughness. The previous analyses carried out by the company regarding its stakeholders, their needs and expectations are taken as a starting point.

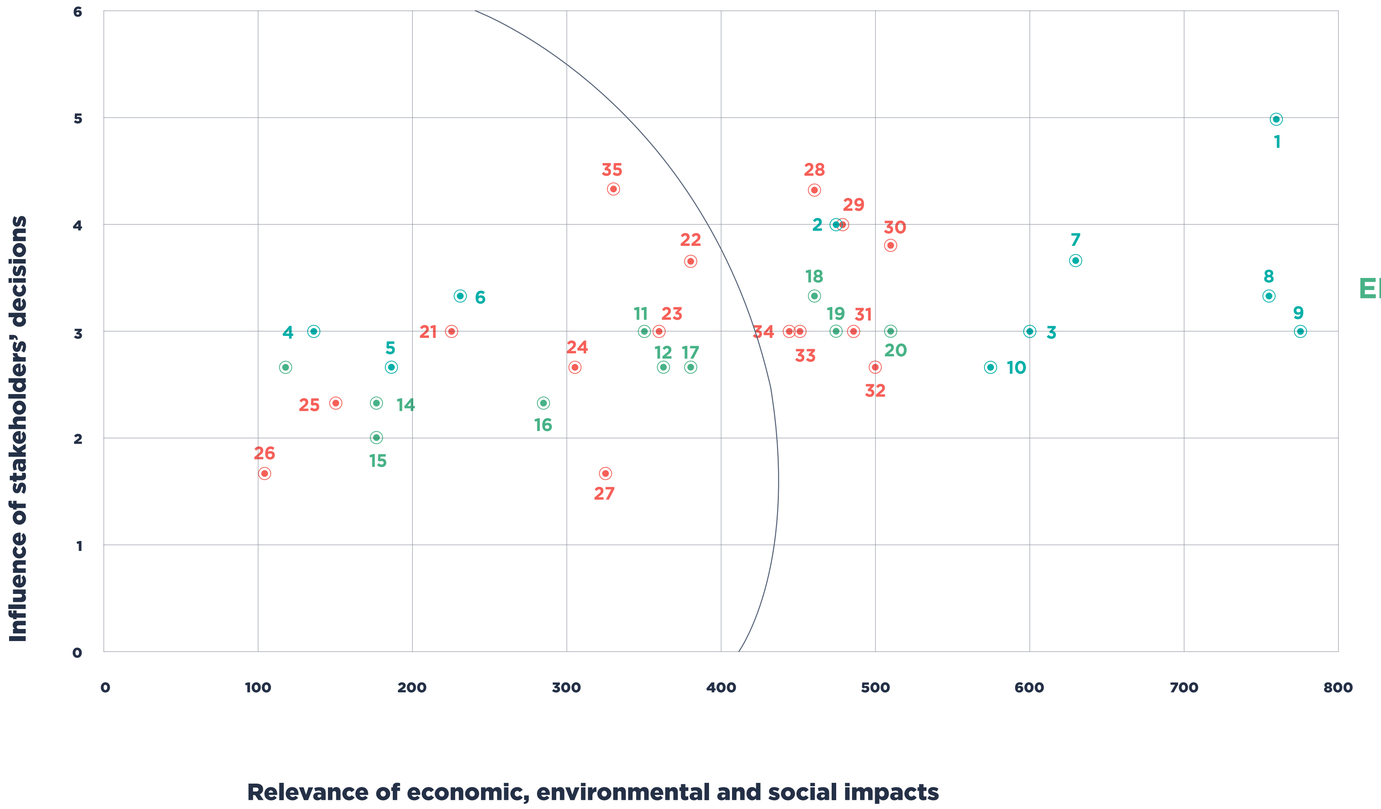
On this basis a few members of the organization were selected to represent stakeholders. The specific group was chosen on account of their ongoing dialogue with those same stakeholders. These people individually assessed the relevance of the economic, environmental and social impact of each of the topics proposed (identified according to an ad hoc context analysis), and also how much influence these three aspects have on the stakeholders' evaluations and decisions. The result of this analysis accounts for Alestis's materiality matrix.

The company's previous analysis of its stakeholders and their needs and expectations is taken as a starting point.



ABOUT THIS REPORT

MATERIALITY MATRIX



Below is a breakdown of the different topics:

ECONOMIC STANDARDS

1. Economic performance.
2. Market presence.
3. Impacts, risks and oportunities.
4. Unfair competition.
5. Taxation.
6. Fight against corruption and conflicts of interest.
7. Behavior, ethics and compliance.
8. Business model, objectives and strategy.
9. Internal and supply chain quality controls.
10. Organization and structure.

ENVIRONMENTAL STANDARDS

11. Circular economy, waste and landfills.
12. Precautionary principles.
13. Biodiversity protection.
14. Environmental assessment of suppliers.
15. Water.
16. Prevention, provisions & guarantees for environmental risks.
17. Emissions and climate change.
18. Compliance with environmental legislation.
19. Raw materials.
20. Energy.

SOCIAL STANDARDS

21. Supplier social assessment.
22. Training and education.
23. Non-discrimination.
24. Respect for human rights.
25. Universal accessibility for people with disabilities.
26. Marketing and labeling of products and services.
27. Customer privacy.
28. Labor/Management relationships.
29. Employment and working conditions.
30. Occupational health and safety.
31. Compliance with socioeconomic legislation.
32. Customer health and safety.
33. Collaboration with governments, tax authorities and the society in which we operate.
34. Diversity and equal opportunities.
35. Freedom of association and collective bargaining.

Thus, the material issues considered have been:

Economic Standards

ECONOMIC PERFORMANCE
BUSINESS MODEL, OBJECTIVES, AND STRATEGY
INTERNAL AND SUPPLY CHAIN QUALITY ASSURANCE
ETHICAL BEHAVIORS AND COMPLIANCE
IMPACTS, RISKS, AND OPPORTUNITIES
ORGANIZATIONAL STRUCTURE
LABOR MARKET PRESENCE

Environmental Standards

ENVIRONMENTAL COMPLIANCE
RAW MATERIALS
ENERGY

Social Standards

LABOR/MANAGEMENT RELATIONSHIPS
EMPLOYMENT AND WORKING CONDITIONS
OCCUPATIONAL HEALTH AND SAFETY
SOCIOECONOMIC COMPLIANCE
CUSTOMER HEALTH AND SAFETY
COLLABORATION WITH ADMINISTRATIONS, TAX AUTHORITIES, AND
COMMUNITIES WHERE WE OPERATE
DIVERSITY AND EQUAL OPPORTUNITY

The most significant changes experienced by the organization during the reporting year have been the approval of the new agreement with creditors, the consolidation of an industrial reorganization based on the integration of processes in the production plants and the launch of a multi-action project for the development of the culture of continuous improvement, with a special focus on the production teams.

The entities considered in the preparation of this report are Alestis Aerospace, S.L. and the affiliated company Alestis do Brasil, Industria Aerospacial Ltda.

This document on non-financial statements was included as a separate item on the agenda for its approval by the Board of Directors of Aciturri on March 30, 2022.

Regarding the contents from Law 11/2018, it has been externally verified by Aenor, an independent verification service provider.

Ana Faet, Head of Communications at Alestis, is the contact person for questions about this document (**ana.faet@alestis.aero**).

ABOUT THIS REPORT

"LAW 11/2018 ON NON-FINANCIAL INFORMATION" CONTENT INDEX

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Environmental risks	Environmental Management	219	--
Carbon emissions	Carbon footprint and other atmospheric emissions	231	201-2, 305
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Circular economy and waste management	Waste	232, 234	306
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Content to report	Section/Subsection	Page	GRI Standards Code (for guidance)
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GRI 102: GENERAL DISCLOSURES (2016)

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APPENDIX I

AUDIT REPORT

GO TO ACITURRI ALESTIS AEROSPACE



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Non-Financial Information
Verification Disclosure

AENOR verification Disclosure for

ACITURRI AERONÁUTICA, S.L.U.

& subsidiaries

concerning the consolidated disclosure of non-financial information

ESTADO DE INFORMACION NO FINANCIERA DE ACITURRI AERONÁUTICA, S.L.U.
MEMORIA DE SOSTENIBILIDAD 2021

according to law 11/2018

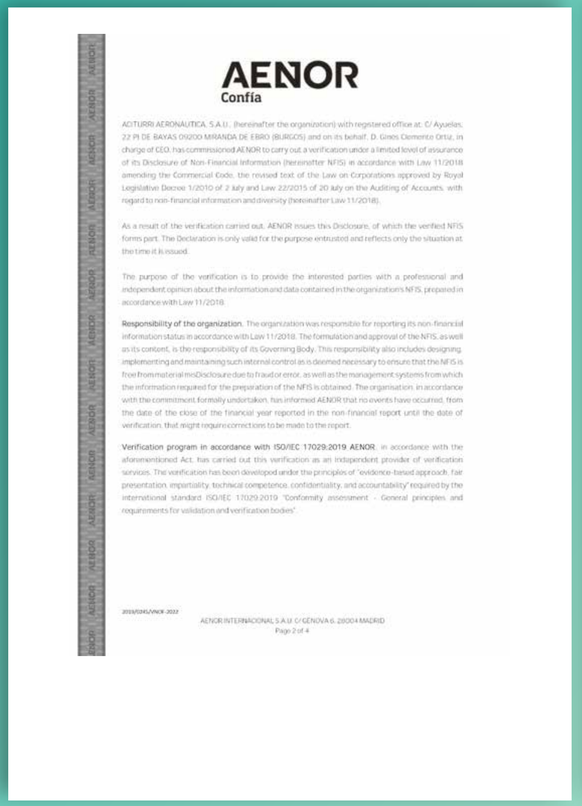
for the period ending on December 31, 2021

In Madrid June 28, 2022

Rafael García Meiro
Chief Executive Officer

2019/0245/ANCE-2022

AENOR INTERNACIONAL S.A.U. C/ GENOVA 6. 28004 MADRID
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ACITURRI AERONÁUTICA, S.A.U. (hereinafter the organization) with registered office at. C/ Ayuelas, 22 PI DE BAYAS 09200 MIRANDA DE EBRO (BURGOS) and on its behalf, D. Gines Clemente Ortiz, in charge of CEO, has commissioned AENOR to carry out a verification under a limited level of assurance of its Disclosure of Non-Financial Information (hereinafter NFIS) in accordance with Law 11/2018 amending the Commercial Code, the revised text of the Law on Corporations approved by Royal Legislative Decree 1/2010 of 2 July and Law 22/2015 of 20 July on the Auditing of Accounts, with regard to non-financial information and diversity (hereinafter Law 11/2018).

As a result of the verification carried out, AENOR issues this Disclosure, of which the verified NFIS forms part. The Declaration is only valid for the purpose entrusted and reflects only the situation at the time it is issued.

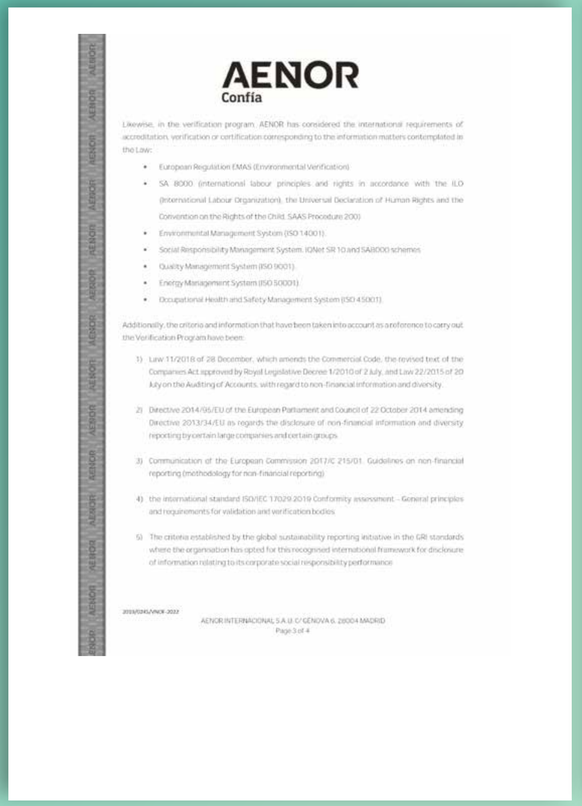
The purpose of the verification is to provide the interested parties with a professional and independent opinion about the information and data contained in the organization's NFIS, prepared in accordance with Law 11/2018.

Responsibility of the organization. The organization was responsible for reporting its non-financial information status in accordance with Law 11/2018. The formulation and approval of the NFIS, as well as its content, is the responsibility of its Governing Body. This responsibility also includes designing, implementing and maintaining such internal control as is deemed necessary to ensure that the NFIS is free from material misDisclosure due to fraud or error, as well as the management systems from which the information required for the preparation of the NFIS is obtained. The organisation, in accordance with the commitment formally undertaken, has informed AENOR that no events have occurred, from the date of the close of the financial year reported in the non-financial report until the date of verification, that might require corrections to be made to the report.

Verification program in accordance with ISO/IEC 17029:2019 AENOR, in accordance with the aforementioned Act, has carried out this verification as an independent provider of verification services. The verification has been developed under the principles of "evidence-based approach, fair presentation impartiality, technical competence, confidentiality, and accountability" required by the international standard ISO/IEC 17029:2019 "Conformity assessment – General principles and requirements for validation and verification bodies".

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Likewise, in the verification program, AENOR has considered the international requirements of accreditation, verification or certification corresponding to the information matters contemplated in the Law:

- European Regulation EMAS (Environmental Verification).
- SA 8000 (international labour principles and rights in accordance with the ILO (International Labour Organization), the Universal Declaration of Human Rights and the Convention on the Rights of the Child. SAAS Procedure 200)
- Environmental Management System (ISO 14001).
- Social Responsibility Management System. IQNet SR 10 and SA8000 schemes
- Quality Management System (ISO 9001).
- Energy Management System (ISO 50001).
- Occupational Health and Safety Management System (ISO 45001).

Additionally, the criteria and information that have been taken into account as a reference to carry out the Verification Program have been:

1) Law 11/2018 of 28 December, which amends the Commercial Code, the revised text of the Companies Act approved by Royal Legislative Decree 1/2010 of 2 July, and Law 22/2015 of 20 July on the Auditing of Accounts, with regard to non-financial information and diversity.

2) Directive 2014/95/EU of the European Parliament and Council of 22 October 2014 amending Directive 2013/34/EU as regards the disclosure of non-financial information and diversity reporting by certain large companies and certain groups.

3) Communication of the European Commission 2017/C 215/01. Guidelines on non-financial reporting (methodology for non-financial reporting)

4) the international standard ISO/IEC 17029:2019 Conformity assessment – General principles and requirements for validation and verification bodies.

5) The criteria established by the global sustainability reporting initiative in the GR standards where the organisation has opted for this recognised international framework for disclosure of information relating to its corporate social responsibility performance.

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AENOR expressly disclaims any liability for decisions, investment or otherwise, based on this Declaration.

During the verification process carried out, under a limited level of assurance, AENOR conducted interviews with the personnel in charge of compiling and preparing the Report and reviewed evidence relating to:

- Activities, products and services provided by the organization.
- Consistency and traceability of the information provided, including the process followed to collect it, sampling information about the reported.
- Completion and content of the disclosure of non-financial information in order to ensure the completeness, accuracy and veracity of its content.
- Letter of Disclosures from the Administrative Body.

The conclusions are therefore based on the results of this sample process, and do not absolve the Organization of its responsibility for compliance with applicable legislation.

The personnel involved in the verification process, the review of findings and the decision to issue this Disclosure have the knowledge, skills, experience, training, supporting infrastructure and capacity to effectively carry out these activities.

CONCLUSION

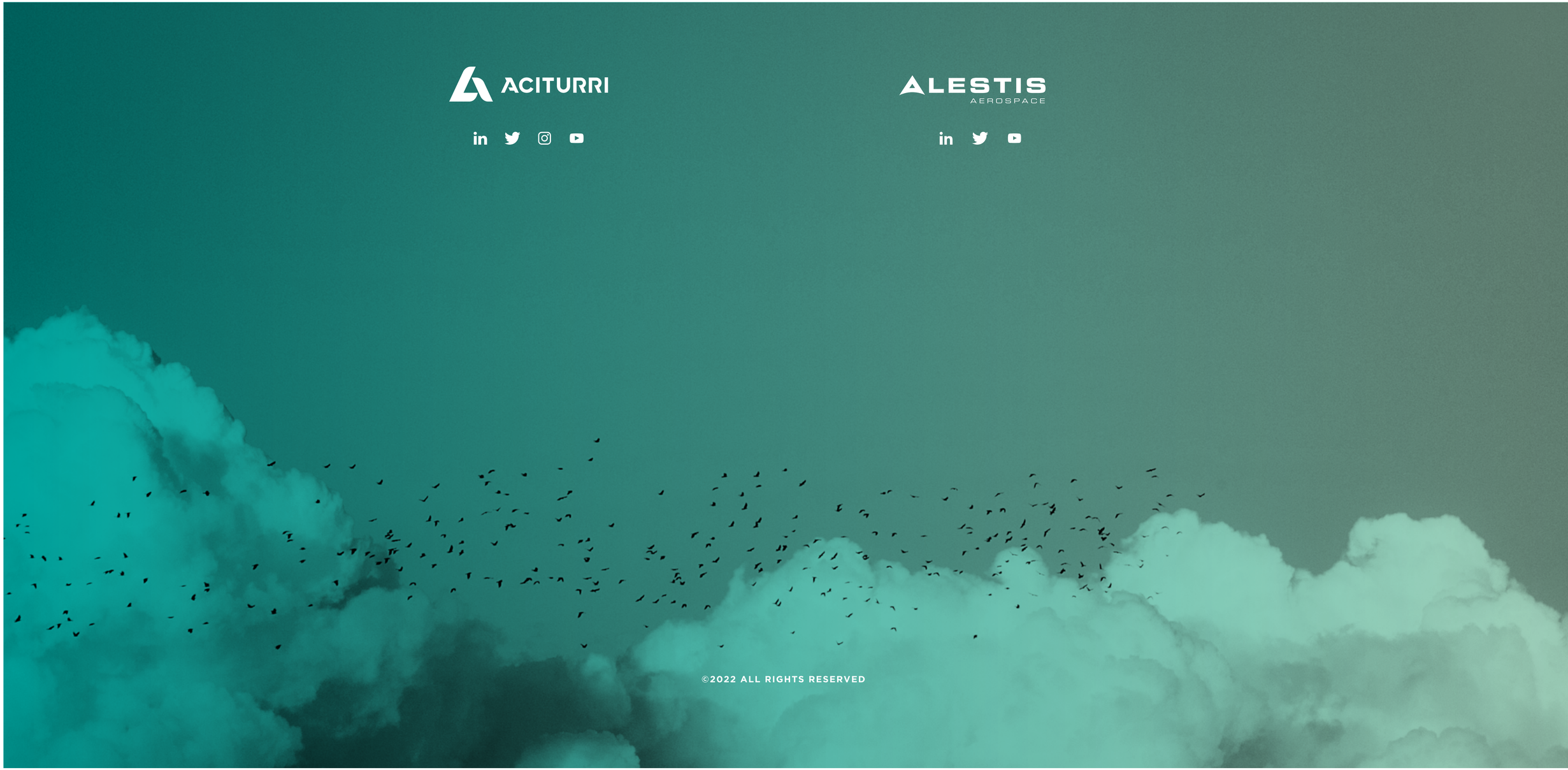
Based on the foregoing, in our opinion, there is no evidence to suggest that the disclosure of non-financial information included in the ESTADO DE INFORMACION NO FINANCIERA ACITURRI AERONÁUTICA, S.L.U.-MEMORIA DE SOSTENIBILIDAD 2021 and for information concerning the reporting period, year ended December 31, 2021, does not provide accurate information on the performance of ACITURRI AERONÁUTICA, S.A.U. and subsidiaries consolidated in the non-financial report, in terms of social responsibility content required by Law 11/2018 regarding environmental, social and personnel issues, including the management of equality, non-discrimination and universal accessibility, human rights, the fight against corruption and bribery, and diversity, except for the average remuneration of directors and managers disaggregated by sex.

2019/0245/ANCE-2022

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